

Page 1

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK - COMMERCIAL DIVISION
-----x
JEFFREY SIMPSON, individually and
derivatively, as managing member of JJ ARCH
LLC, suing derivatively as managing member
of ARCH REAL ESTATE HOLDINGS LLC, and JJ
ARCH LLC,

Plaintiffs,

-against- Index No.:
158055/2023

JARED CHASSEN and FIRST REPUBLIC BANK,
Defendants.

JARED CHASSEN, individually and derivatively on behalf of JJ ARCH LLC, as member, and as member of JJ ARCH LLC, derivatively on behalf of 225 HPR LLC, JJ NY 550 LLC, 1640 MONTAUK LLC, 1640 MOTORS LLC, 146 E. 89 BORROWER 1 LLC, and ARCH REAL ESTATE HOLDINGS LLC,

Counterclaim Plaintiffs,

-against- Index No.:
158055/2023

JEFFREY SIMPSON and YJ SIMCO LLC,

Counterclaim Defendants

- a n d -

JJ ARCH LLC, 225 HPR LLC, JJ NY 550 LLC,
1640 MONTAUK LLC, 1640 MOTORS LLC, 146 E.
89 BORROWER 1 LLC, and ARCH REAL ESTATE
HOLDINGS LLC.

Nominal Defendants

Page 2

1

2

608941 NJ, INC.,

3

4

-against-

Index No.:

5

158055/2023

6

JEFFREY SIMPSON, JJ ARCH LLC and ARCH REAL
ESTATE HOLDINGS LLC,

7

Defendants.

8

9

-and-

10

ARCH REAL ESTATE HOLDINGS LLC,

Nominal Defendant.

11

-----x
DATE: February 13, 2025
TIME: 10:34 a.m.

12

13

14

15

16

EXAMINATION BEFORE TRIAL of
JEFFREY SIMPSON, held at the offices of
Veritext Legal Solutions, 7 Times Square,
16th Floor, New York, New York 10036,
before Nicole Veltri, RPR, CRR, a Notary
Public of the State of New York.

17

18

19

20

21

Page 3

1
2 A P P E A R A N C E S:
3

4 THE LORENC LAW FIRM
5 Attorneys for JEFFREY SIMPSON
6 62 West 45th Street, Suite 903
7 New York, New York 10036
8 BY: ROBERT C. LORENC, ESQ.
9 robert@lorenclaw.com

10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
LAW OFFICE OF ALLEN SCHWARTZ
Attorneys for JARRED CHASSEN
2635 Nostrand Avenue, 4E
Brooklyn, New York 11210
BY: ALLEN SCHWARTZ, ESQ.

HAYNES & BOONE LLP
Attorneys for 608941 NJ, INC.
30 Rockefeller Plaza, 26th Floor
New York, New York 10112
BY: LESLIE C. THORNE, ESQ.
AISHLINN BOTTINI, ESQ.

OLSHAN FROME WOLOSKY LLP
Attorneys for ARCH REAL ESTATE HOLDINGS LLC
1325 Avenue of the Americas
New York, New York 10019
BY: JEREMY KING, ESQ.
(via videoconference)

ALSO PRESENT:
ROBERT RUDIS, Videographer
KEVIN WIENER (via videoconference)
MICHAEL WIENER (via videoconference)
JARED CHASSEN (via videoconference)

* * *

Page 4

1

221. UNIFORM RULES FOR THE
CONDUCT OF DEPOSITIONS

3

221.1 Objections at Depositions

4

(a) Objections in general. No objections shall be made at a deposition except those which, pursuant to subdivision (b), (c) or (d) of Rule 3115 of the Civil Practice Law and Rules, would be waived if not interposed, and except in compliance with subdivision (e) of such rule. All objections made at a deposition shall be noted by the officer before whom the deposition is taken, and the answer shall be given and the deposition shall proceed subject to the objections and to the right of a person to apply for appropriate relief pursuant to Article 31 of the CPLR.

5

6

(b) Speaking objections restricted. Every objection raised during a deposition shall be stated succinctly and framed so as not to suggest an answer to the deponent and, at the request of the questioning attorney, shall include a clear statement as to any defect in form or other basis of error or irregularity. Except to the extent permitted by CPLR Rule 3115 or by this rule, during the course of the examination persons in attendance shall not make statements or comments that interfere with the questioning.

7

8

9

221.2 Refusal to answer when objection is made. A deponent shall answer all questions at a deposition, except (i) to preserve a privilege or right of confidentiality, (ii) to enforce a limitation set forth in an order of the Court, or (iii) when the question is plainly improper and would, if answered, cause significant prejudice to any person. An attorney shall not direct a deponent not to answer except as provided in CPLR Rule 3115 or this subdivision. Any refusal to answer or direction not to answer shall be accompanied by a succinct and clear statement of the basis therefor. If the deponent does not answer a question, the examining party shall have the right to complete the remainder of the deposition.

Page 5

1

2 **221. UNIFORM RULES FOR THE
CONDUCT OF DEPOSITIONS**

3

4 **221.3 Communication with the deponent**

5

6 An attorney shall not interrupt the
deposition for the purpose of communicating
with the deponent unless all parties
consent or the communication is made for
the purpose of determining whether the
question should not be answered on the
grounds set forth in section 221.2 of these
rules and, in such event, the reason for
the communication shall be stated for the
record succinctly and clearly.

9

10 IT IS FURTHER STIPULATED AND AGREED
11 that the transcript may be signed before
any Notary Public with the same force and
effect as if signed before a clerk or a
12 Judge of the Court.

13

14 IT IS FURTHER STIPULATED AND AGREED
15 that the examination before trial may be
utilized for all purposes as provided by
the CPLR.

16

17 IT IS FURTHER STIPULATED AND AGREED
18 that all rights provided to all parties by
the CPLR cannot be deemed waived and the
appropriate sections of the CPLR shall be
controlling with respect hereto.

19

20 IT IS FURTHER STIPULATED AND AGREED
21 by and between the attorneys for the
respective parties hereto that a copy of
this examination shall be furnished,
22 without charge, to the attorneys
representing the witness testifying herein.

23

24

25

Page 6

1

2 VIDEOGRAPHER: Good morning.

3

We are going on the record at

4

10:32 a.m. February 13th, 2025.

5

Please note the microphones are sensitive and may pick up private conversations and whispering. Please mute your mobile phones at this time. Audio and video recording will continue to take place unless all parties agree to go off the record.

10

This is media unit one of the video-recorded deposition of Jeffrey Simpson taken by counsel for defendant in the matter of Jeffrey Simpson, individually, and derivatively, et al, Plaintiffs, against Jared Chassen and First Republic Bank, Defendants, as well as Jared Chassen, individually and derivatively, et al, Counter Plaintiff, against Jeffrey Simpson and YJ Simco LLC, Counterclaim Defendants, and JJ Arch LLC, et al, as well as 608941 NJ, Inc.,

Page 7

1

2 Plaintiff, against Jeffrey Simpson,
3 JJ Arch LLC, et al, Defendants, and
4 Arch Real Estate Holdings LLC,
5 Nominal Defendant, to be heard in
6 Supreme Court of the State of New
7 York, County of New York Commercial
8 Division, Index Number 158055/2023.

9 The location of the deposition
10 is Veritext New York City, 7 Times
11 Square New York, New York. My name
12 is Robert Rudis. I'm the
13 videographer. The court reporter is
14 Nicole Veltri, and we represent the
15 firm Veritext Legal Solutions. I'm
16 not related to any party in this
17 action nor am I financially
18 interested in the outcome.

19 If there are any objections to
20 proceeding, please state them at the
21 time of your appearance. Counsel and
22 all present including remotely will
23 now state their appearances
24 affiliations for the record beginning
25 with the noticing attorney.

Page 8

1 J. SIMPSON

2 MR. SCHWARTZ: Good morning.

3 My name is Allen Schwartz. I'm
4 appearing on behalf of Jared Chassen.

5 MS. THORNE: Leslie Thorne and
6 Aishlinn Bottini of Haynes & Boone
7 LLP for 608941 NJ, Inc.

8 MR. KING: Jeremy King, Olshan
9 Frome Wolosky, for Arch Real Estate
10 Holdings.

11 VIDEOGRAPHER: Anybody else on
12 Zoom? Did we get your appearance?

13 MR. LORENC: No.

14 VIDEOGRAPHER: Please.

15 MR. LORENC: Robert Lorenc for
16 Plaintiff, Jeffrey Simpson,
17 derivatively JJ Arch.

18 VIDEOGRAPHER: Thank you.

19 Would the court reporter please swear
20 in the witness and then counsel my
21 proceed.

22 J E F F R E Y S I M P S O N, called as a
23 witness, having been first duly sworn by a
24 Notary Public of the State of New York, was
25 examined and testified as follows:

Page 9

1 J. SIMPSON

2 EXAMINATION BY

3 MR. SCHWARTZ:

4 Q. Good morning, Mr. Simpson. My
5 name is Allen Schwartz. I represent Jared
6 Chassen in this action. I'm going to be
7 asking you questions today. You understand
8 you're under oath?

9 A. Yes.

10 Q. You understand that that's the
11 same as if you were in Court?

12 A. Yes.

13 Q. You understand you're required
14 to give truthful accurate and complete
15 testimony today?

16 A. Yes.

17 Q. And you're going to do that?

18 A. Yes.

19 Q. You understand that your
20 testimony is being transcribed and recorded
21 today?

22 A. Yes.

23 Q. You understand that you'll be
24 able to review any transcript after?

25 A. Yes.

Page 10

1 J. SIMPSON

2 Q. And you'll be able to make
3 corrections, yes?

4 A. Yes.

5 Q. But if you change your
6 testimony, the fact finder will be able to
7 see the changes that you make.

8 You understand that?

9 A. Yes.

10 Q. If you don't understand a
11 question today, Mr. Simpson, let me know.

12 A. Okay.

13 Q. Okay?

14 A. Mm-hmm.

15 Q. But if you do answer, that will
16 mean that you do understand the question,
17 okay?

18 A. Correct.

19 Q. If there's anything that you
20 remembered today later after you've
21 answered a question, please be sure to tell
22 me today, okay?

23 A. Mm-hmm.

24 Q. Is that a yes?

25 A. Yes.

Page 11

1 J. SIMPSON

2 Q. Is there any reason, medical or
3 otherwise, that you cannot give complete,
4 truthful and accurate testimony here today?

5 A. No.

6 Q. And if that were to changed to,
7 you will tell me immediately, right?

8 A. Yes.

9 Q. All right. We're going to be
10 breaking around every hour if that's okay.
11 And if you need a break earlier, please let
12 me know. We'll take one earlier.

13 A. Okay.

14 Q. I'm going to ask that you give
15 me only verbal answers. No nodding, okay?

16 A. Yes.

17 Q. And no interrupting each other
18 today. I'll ask a question. Wait for me
19 to ask the question, and then you can
20 answer the question, okay?

21 A. Okay.

22 Q. Mr. Simpson, have you ever been
23 deposed before?

24 A. Yes.

25 Q. When?

Page 12

1 J. SIMPSON

2 A. I believe it was a case -- only
3 once that I recall, and that would be --
4 there was an Arch related case that was --
5 I'm just trying to think of the specifics.
6 It was in relations to Meir Babaev and BH3.

7 (Reporter clarification.)

8 A. Meir, M-E-I-R, and Babaev,
9 B-A-B-A-E-V. And the company is BH3, I
10 believe. Just going off of memory. It was
11 a part of the Myrtle Point project as
12 relates to Arch Real Estate Holdings. It's
13 the only one that I remember off the top of
14 my head. There could be others but that
15 one, I believe, was about two years ago or
16 so plus or minus. It was in conjunction
17 with Judge Ostrager and it was -- yeah.

18 Q. Okay. So other than that
19 deposition, you don't recall any others?

20 A. No. But I will tell you later
21 if I remember others. That's not something
22 I keep off the top of my head to be honest.
23 Definitely nothing recent that I can
24 recall.

25 Q. Okay. How did you prepare for

Page 13

1 J. SIMPSON

2 this deposition today?

3 A. I read through the various
4 documents in the docket. I've looked at
5 communications that has been dialogued.
6 Particularly as this case has developed.

7 Q. And approximately how many --
8 how long did you spend reviewing documents
9 in preparation for today's deposition?

10 A. I would say four hours.

11 Q. And when you say you reviewed
12 emails, what emails in particular did you
13 review?

14 A. I think you all have seen them.
15 I've illustrated them to Mr. Wiener, and
16 those are the emails that I researched for
17 today.

18 Q. And when you say that we've
19 seen them, how did "we" see them?

20 A. They were communicated to
21 everybody here --

22 Q. And how --

23 A. -- to illustrate where this
24 case has gone, and you have a copy of it.

25 Q. So the emails you reviewed were

Page 14

1 J. SIMPSON

2 emails you've provided to the parties in
3 this action; is that correct?

4 A. Correct.

5 Q. Is there any emails that you
6 reviewed that you haven't provided to the
7 parties in this action?

8 VIDEOGRAPHER: Standby. I can
9 help.

10 A. Thank you.

11 Q. Are there any emails that you
12 reviewed in preparation for today's
13 deposition that you haven't provided the
14 parties in this action?

15 A. Not that I'm aware of. Not
16 that I can recall.

17 Q. Did you speak to anyone in
18 preparation for this deposition?

19 A. Yes. My attorney, Mr. Lorenc.

20 Q. And who else?

21 A. That's it.

22 Q. And for how long did you speak
23 to your attorney?

24 A. Unfortunately, not long as you
25 know the events of yesterday. We planned

Page 15

1 J. SIMPSON
2 to spend time yesterday to do that, and
3 unfortunately it became a time frame that
4 was spent on settlement negotiations rather
5 than preparation. So we planned on
6 speaking with Mr. Lorenc for hopefully at
7 least two hours in preparation, but that
8 was not afforded to us given the
9 circumstances.

10 So I would say -- and Mr.
11 Lorenc can answer, I'm going to say
12 30 minutes is probably about the amount of
13 time allocated from my opinion. I may have
14 it wrong that that we've spent -- for
15 various topics, but I believe 30 minutes we
16 spent preparing for this.

17 Q. The Court ordered this
18 deposition on February 5th, 2025, correct?

19 A. I would have to check. I don't
20 recall. I have to check the exact date,
21 but it was -- sounds approximately right.

22 Q. Okay. And other than your
23 counsel, you did not discuss this
24 deposition with anybody else?

25 A. I've told my wife that I'm just

Page 16

1 J. SIMPSON
2 generally uncomfortable about it; but other
3 than that, she doesn't know any facts. I
4 haven't discussed any facts with her about
5 it. She knows that I'm here today, you
6 know, but she knows that I'm, you know,
7 it's not an easy thing for anyone to do.
8 So she knows it's a challenging moment.
9 That's all.

10 Q. But you didn't discuss the
11 substance of the deposition or your
12 testimony with here?

13 A. No.

14 Q. And, Mr. Simpson, I would need
15 you to open up your laptop so that I can
16 show you exhibits here today. So I would
17 ask that you open your laptop that was
18 provided to you.

19 A. I thought you said I was not
20 supposed to do that. This is my laptop,
21 not theirs. Are you suggesting something
22 else? I'm sorry.

23 MR. LORENCE: We can off the
24 record.

25 MR. SCHWARTZ: Let's go off the

Page 17

1 J. SIMPSON

2 record.

3 VIDEOGRAPHER: Off the record

4 at 10:42.

5 (Whereupon, a short recess was
6 taken.)

7 VIDEOGRAPHER: On the record at
8 11:04. Please proceed.

9 Q. Mr. Simpson, the Court has told
10 you not to send substantive emails to it,
11 right?

12 A. Yes.

13 Q. And it's told you that a number
14 of times, right?

15 A. Number is a broad word. I
16 think once or twice. And I would say it
17 wasn't directed to me. It was all parties
18 actually.

19 Q. Including you?

20 A. All parties.

21 Q. And that includes you, correct?

22 A. Correct. In the normal course,
23 it wouldn't include me because I'm not a
24 lawyer; but in this case, yes, for a short
25 period of time, yes.

Page 18

1 J. SIMPSON

2 Q. I would like to show you what
3 is going to be marked Exhibit C1.

4 (Whereupon, Exhibit C1

5 February 9th, 2025, email was marked
6 for identification as of this date.)

7 Q. We're going to start with two
8 actually, so it's going to be marked as C2.

9 (Whereupon, Exhibit C2 Notice
10 of Discovery was marked for
11 identification as of this date.)

12 Q. Exhibit 2. Do you see the
13 document appearing on your screen?

14 A. I do.

15 Q. Can you take a moment to review
16 that document?

17 A. Yes.

18 Q. Okay. Just to be clear, the
19 exhibit is C1. It's been stickered C1, but
20 for whatever reason it's showing up on your
21 screen is C2 so this is the document
22 Exhibit C 1.

23 What do you recognize this
24 document to be?

25 A. This is an email that I sent on

Page 19

1 J. SIMPSON

2 Sunday, February 9th at 11:45 a.m. to a
3 group of folks that some are here, mostly
4 here; and it got to a dialogue where I felt
5 it needed intervention, so I've included
6 other folks in addition to the parties
7 here.

8 Q. And who are those other folks
9 that you included in addition to the
10 parties here?

11 A. Everybody including the FBI,
12 the state police, Alvin Bragg's office from
13 the DA of New York, New York State DA, the
14 administrative judges, the Honorable Joel
15 Cohen presides over this case, and then the
16 parties here and are affiliates because
17 there's a number of affiliates that are
18 here as well. If you'd like, I can list
19 every one of those if it makes you happy.

20 Q. That's okay, Mr. Simpson. I
21 just want to point your attention to the
22 first four words of the email where it
23 says, "Good morning, Judge Cohen."

24 Do you see that?

25 A. Yes, I do.

Page 20

1 J. SIMPSON

2 Q. So this email was directly to
3 Judge Cohen; would that be a fair
4 statement?

5 A. Yes, it was.

6 Q. Okay. And Judge Cohen had told
7 you -- or -- strike that.

8 The Court had told you not to
9 send email, correct?

10 A. The Court says a lot of things.

11 MR. LORENC: Objection. Asked
12 and answered.

13 Q. You can answer. The Court told
14 you not to send emails?

15 MR. LORENC: You can answer.

16 A. Again, I'll answer. The Court
17 says a lot of things that are inconsistent
18 including to all parties, which you've also
19 sent emails and others have sent too. So
20 put that on the record. You have sent
21 emails countless times and others have too;
22 and by the way, to be clear, the Court has
23 made certain suggestions about emails, what
24 it can be used for, what it couldn't be
25 used.

Page 21

1 J. SIMPSON

2 And by the way to also be
3 clear, the Honorable Joel Cohen wrote an
4 email on a Sunday that's not on the record
5 that was just an email. So it is a free
6 for all, but continue as you may.

7 Q. But the Court directed you not
8 to send substantive emails.

9 A. Not to me personally. To all
10 parties including you and me and we all
11 have sent emails.

12 Q. But the Court specifically
13 directed not to the parties not to send
14 substantive emails, correct?

15 MR. LORENC: Objection. Asked
16 and answered.

17 Q. You may answer.

18 MR. LORENC: You have to
19 answer. You have to answer.

20 A. Yes.

21 Q. Okay. Mr. Simpson, I'm going
22 to show you what was going to be marked
23 as -- bear with me.

24 If you can take a look at what
25 is on the screen as labeled Exhibit 3, but

Page 22

1 J. SIMPSON
2 has been marked Exhibit C2 and open that up
3 and let me know when you have?

4 A. Okay. I have it open.

5 Q. Do you recognize this document?

6 A. I'm trying to see who's
7 Jared -- (perusing). Okay. Yes. What's
8 your question?

9 Q. What do you recognize this
10 document to be?

11 A. It looks like it's a document
12 asking for discovery.

13 Q. Have you seen this document
14 before?

15 A. Yes, I have.

16 Q. When did you see it first?

17 A. I don't have the date that I'm
18 aware of, but it's probably within a week
19 plus or minus.

20 Q. Okay. And if I turn your
21 attention to page ten of the document where
22 you see it says "document request."

23 Do you see that?

24 A. I do.

25 Q. And if I can take your

Page 23

1 J. SIMPSON
2 attention specifically to Paragraph 3,
3 where it says: All documents, you or
4 anyone acting on your behalf provided to
5 the accountant purportedly employed by the
6 JJ Arch entities who you asserted via
7 counsel on February 4th, 2025, is, quote,
8 diligently working towards resolving any
9 updated information and/or outstanding tax
10 filings along with the applicable returns
11 for 2024 anticipated to be filed this year,
12 end of quote, as stated in Mr. Robert
13 Lorenc's letter to the Court at NYSCEF
14 number 1087.

15 Do you see that?

16 A. Yes.

17 Q. Who's the accountant that you
18 have retained on behalf of the JJ Arch
19 entities?

20 A. So I reached out to Lear &
21 Pannecker who has been the accounting
22 firm that has been worked on a lot of Arch
23 and JJ Arch since the very beginning to
24 find out which filings they have done,
25 which filings they have not done, because

Page 24

1 J. SIMPSON

2 it appears to me that there's a number of
3 JJ filings that have even been processed by
4 the Wieners somehow. So I asked them for a
5 list status of all of the entities that
6 they're working on and which years and
7 dates they have completed and which years
8 are open, what dollars are open as relates
9 to the various entities.

10 I've made multiple requests to
11 Mr. Kennedy, John Kennedy there, of this
12 effort without response over several
13 months. For obvious reasons like most
14 folks want nothing to do with this
15 litigation, so they avoid it; but after
16 several inquiries, he did finally give us a
17 list and I shared it with Mr. Lorenc. And
18 I asked him what it would take to get these
19 tax paperworks up to date and done.

20 What should also know, if you
21 don't already know, is JJ Arch is the top
22 tier of the entire company. So without
23 having the accounting or the I should say
24 the K1s of all the parts and pieces below a
25 JJ Arch filing is the last filing on the

Page 25

1 J. SIMPSON

2 train. It cannot be done without offering
3 anything else below it.

4 So if there's any Arch
5 properties, Arch MM properties, as in
6 managing manager, Arch MM entities which
7 resulted in Arch or JJ Arch entity, those
8 all have to be processed to get to a JJ
9 Arch tax filing. It's not possible to do
10 without it because it's all encompassing;
11 and if anyone were to look at a JJ Arch tax
12 return from two years ago, one would see
13 this exact issue.

14 And Kennedy has told us this
15 over the years, and it's unfortunate that
16 Chassen and my returns end up suffering to
17 be the very end because we had to get
18 everything else done across the board
19 first.

20 So that's -- so the exercise of
21 asking Mr. Kennedy as I've seen K1s flow in
22 which seems to be under the control of the
23 temporary managing member which is 608941,
24 a/k/a Oak, I have been suggesting to
25 Mr. Kennedy that it would be good to

Page 26

1 J. SIMPSON
2 reconcile the remainder of the tax returns
3 because these four properties as contained
4 in these discussions are the tail wagging
5 the dog. They're itty-bitty compared to
6 larger billion dollar business that we had,
7 and they're relatively not relevant in the
8 scheme of the overall scope.

9 So he would do those in
10 conjunction with those that were prepared
11 by others. He also alerted me to several
12 other accountants that are not -- that he's
13 not in control of over which I'm aware of,
14 which I have no access to at this point,
15 which do some of the tax returns that he
16 didn't have to date. And that would be
17 firms like Citrin Cooperman, et cetera.

18 So on the -- on the front of
19 returns, John Kennedy would be the only
20 person that could possibly do it because
21 he's the only one that has the history
22 which most information that I would need I
23 do not have access to.

24 Q. So let me just be clear,
25 Mr. Simpson, has Mr. Kennedy been retained

Page 27

1 J. SIMPSON

2 to prepare JJ Arch and the JJ Arch
3 controlled entities tax filings?

4 A. He gave me his proposal of what
5 the cost would be, and I am considering how
6 to proceed as to which are done first and
7 which are done second and third tied to
8 cash flow. So he has done -- there's been
9 engagement letters all along. I've never
10 dismissed him from those entities.

11 If you look at the prior
12 returns, he's the only one that did them.
13 I say him, not him, Lear & Pannecker, he
14 may not be the actual accountant that
15 signed the returns, but his firm is the
16 only firm who's ever done these entities
17 since the very beginning. So in my view,
18 he's always been retained. He's never not
19 been retained. I never dismissed him in
20 any way.

21 Again, tried to get in touch
22 with him many times; and it finally got to
23 him. It's been the last, whatever, week or
24 two as Mr. Lorenc reported finally got to
25 him saying this is very important, I need

Page 28

1 J. SIMPSON

2 to know now where we stand.

3 And that's the answer I have
4 for you is, again, I've never not retained
5 him. There are funds that are due which he
6 asked for which are not ready available.
7 JJ Arch doesn't have money. So as soon as
8 I can find the funds available via JJ Arch,
9 he will get paid where I can pay him and
10 come up with a strategy of which ones need
11 to be done first based upon order of
12 priority which have the greatest
13 importance.

14 Q. But he hasn't been paid yet, is
15 that correct, for his past due amounts
16 owed?

17 A. I mean, I was made aware of the
18 amount last week or two weeks ago; so in
19 the last two weeks, no, JJ Arch does not
20 have the funds.

21 Q. And he hasn't agreed to do the
22 tax returns and the tax filings yet; is
23 that --

24 A. He hasn't said that. He has
25 not said that. He said that here is a

Page 29

1 J. SIMPSON

2 list. Here is what's open. He didn't say
3 he's not going to do it. He suggested
4 moneys that were due; and my view of the
5 world is, I don't ask people to do the very
6 next step in a follow up until I have
7 payment.

8 So my suggestion is, I -- in my
9 own mind is I'm going to give him 5,000,
10 \$10,000 as soon as I can and then pick and
11 choose which ones are the highest priority
12 to move it forward.

13 Q. And has he told you that he is
14 going to do it?

15 A. He didn't say he wouldn't.

16 Q. Did he say he would do it?

17 A. I have to look at the email. I
18 can't tell you. I have to look at the
19 email. I didn't see him say any objection
20 to it.

21 Q. Did you speak to him on the
22 telephone?

23 A. No. He didn't take my phone
24 call, again, because of this circumstance
25 that you all put me in here.

Page 30

1 J. SIMPSON

2 MR. SCHWARTZ: We would ask for
3 the production of that email.

4 A. We've given it. I'm pretty
5 sure we have given it as an exhibit.

6 MR. SCHWARTZ: We haven't
7 gotten that email. So we would ask
8 for production of that email.

9 MR. LORENC: I think it was
10 forwarded Mr. Chassen.

11 A. I believe so, but we have no
12 problem delivering it.

13 Q. Besides Mr. Kennedy, is there
14 any other accountant that has been retained
15 by you to prepare any tax filings or has
16 been diligently working towards resolving
17 any outstanding filings?

18 A. On the tax filings, no. As it
19 relates to bookkeeping, I've had various
20 folks who are not accountants, right, by
21 background even when we had the accounting
22 folks who worked for AREH in my office,
23 none of them were actually CPAs by
24 accountants. They were people that did
25 some bookkeeping. Some did, you know,

Page 31

1 J. SIMPSON
2 processing to help accountants. I think we
3 had one CPA on staff and he was not ever
4 utilizing his license on behalf of anything
5 that we did at AREH or JJ Arch.

6 So the answer to your question
7 is, I have, like, at the Rever Motors
8 property there is a person who's been on
9 staff who is working on a 1099 basis who
10 has been working through the books and
11 records to generate, you know, updates as
12 much as possible QuickBooks and that's what
13 she's been tasked to do and she's been
14 doing that for a period of time.

15 Q. And who is that individual at
16 Rever Motors?

17 A. Should I share that?

18 Q. You can't ask your attorney
19 whether you can --

20 A. I have to get the consultant's
21 name.

22 Q. You have to answer my question.

23 A. I don't have the consultant's
24 name in front of me. It's an LLC.

25 Q. You said that there's a 1099

Page 32

1 J. SIMPSON

2 employee --

3 A. They're a consultant.

4 Q. You said there's a 1099

5 employee at Rever Motors who was doing
6 bookkeeping?

7 A. 1099 is the same thing as a --
8 when people work as a 1099 --

9 Q. So --

10 A. -- this person works under an
11 LLC. I can get you the name of the LLC. I
12 can provide that to you today.

13 Q. I need the name of the LLC and
14 the individual.

15 So what's the name of the LLC?

16 A. I don't know. I have to look.

17 Q. What's name of the individual?

18 A. I have to look what her full
19 name is.

20 Q. What's the first name?

21 A. Jessica. I don't remember her
22 last name.

23 Q. And how long has she been a
24 1099 employee of Rever Motors?

25 A. I'm going to correct the

Page 33

1 J. SIMPSON
2 record. She's not an employee. There is a
3 1099. She gets paid for service like an
4 outside vendor, and she's been doing it for
5 a couple of weeks.

6 Q. And she's -- and before --
7 prior to a couple weeks, did she have any
8 interaction with you?

9 A. No.

10 Q. Okay.

11 A. I do not know her other than a
12 few weeks ago.

13 Q. So your testimony is, you don't
14 recall her last name?

15 A. I don't off the top of my head.
16 She's not someone I talk to every day.

17 Q. And what would you need to do
18 to recall her last name?

19 A. I can look for it. I can get
20 it back to you before we're done today.

21 Q. How would you go about finding
22 her last name?

23 MR. LORENC: Objection. If you
24 want to refresh his recollection with
25 something, please do.

Page 34

1 J. SIMPSON

2 MR. SCHWARTZ: I'm asking him
3 how he would go about doing
4 something. He can answer the
5 question.

6 A. I would probably look for an
7 exchange, an email or something to see if I
8 can find something of that sort.

9 Q. And you have access that your
10 email here today, correct?

11 A. Yes.

12 Q. And so would you go look in
13 your email and tell me her name?

14 A. Yeah, sure.

15 Q. Mr. Simpson, if you're having
16 difficulties locating it, I would ask that
17 you can look at it -- look for her last
18 name during a break, and let us know at
19 that time.

20 A. That would be great because I'm
21 trying to find the full name and her LLC,
22 and that's what I'm struggling to find. I
23 just have her in, like, as Jessica G in my
24 thing; and I think she has, like, a two
25 name last name and I'm trying to give you

Page 35

1 J. SIMPSON

2 the full proper name.

3 Q. We'll revisit this after a
4 break?

5 A. That's fine.

6 Q. You also mention there are
7 other people who did bookkeeping. Who are
8 those folks?

9 MR. LORENC: Can we get
10 clarity? Are you talking just about
11 Rever Motors, or are we talking other
12 entities?

13 MR. SCHWARTZ: We are
14 talking -- well, we can talk about
15 bookkeeping at Rever Motors.

16 Q. Who at Rever Motors does
17 bookkeeper?

18 A. There is very limited
19 bookkeeping that has been able to be done.
20 We have been trying to -- when I say we
21 there has been a variety of employees who
22 have been in the office who I've asked to
23 record various, you know, sales and
24 transactions of things. I do as much as I
25 can on my own. Whenever we bring money in,

Page 36

1 J. SIMPSON

2 I record it on my own as far as, like, any
3 income, any expense, I try to do that on my
4 own as much as I can because we're very
5 limited with capital. So I have various
6 staff members who have done, you know, some
7 portions of it. They're not accountants.
8 They're not, like, dedicated bookkeepers.
9 They're people who answer the phone. It
10 could be, you know -- or an intern or
11 receptionist, whatever, that say, hey, can
12 we record \$5,000 that that person has paid
13 and go into, you know, the systems that we
14 have and make sure we record every dollar
15 we receive.

16 Q. And who are those people who
17 have done any kind of bookkeeping at Rever
18 Motors you're referring to?

19 A. The various staff members.

20 Q. Yeah.

21 A. I don't believe to bring them
22 into this makes any sense. I don't see how
23 that's appropriate. I'm sorry.

24 Q. I'm asking you a question,
25 Mr. Simpson. You're obligated to answer

Page 37

1 J. SIMPSON

2 it.

3 A. I'm not sure that I am if we
4 object to it, Robert, right?

5 Q. You are obligated to answer.

6 A. I'm going to ask my attorney.
7 Am I going to give him a list of every
8 employees that ever worked there?

9 MR. LORENC: Limited to
10 employees or consultants or interns
11 who participated in the bookkeeping
12 process; is that correct?

13 MR. SCHWARTZ: Correct.

14 That's --

15 MR. LORENC: That's the
16 question.

17 Q. The -- if the court reporter
18 can repeat the question, if you can repeat
19 that question if you don't mind.

20 (Whereupon, the referred to
21 question was read back by the
22 reporter.)

23 A. So there's several individuals
24 in the office that have been -- as I said,
25 if there's a transaction that comes in,

Page 38

1 J. SIMPSON
2 they would do that amongst other things,
3 there's ordering parts for vehicles, et
4 cetera. But any time we would collect
5 money of any kind, there's a known standard
6 that I have that said everything has to be
7 logged in and we have a system that we use
8 and there's not a lot of people have access
9 to the system. I'm one of them. The
10 system is called Shopmonkey,
11 S-H-O-P-M-O-N-K-E-Y. And that's -- it's
12 not a books and records. It's actually we
13 call it, like, a -- service writers. It's,
14 like, an auto service writers system and
15 that auto service writers system -- are you
16 showing something to Ms. Thorne right now?
17 Is that what you're doing?

18 Q. No. I wasn't showing anything
19 to anybody.

20 A. Okay, okay. That bookkeeper
21 system -- I'm sorry. Service writer
22 system. Anybody who wants to looks it up,
23 you can see it. It's not bookkeeper
24 system, sorry. That system is where we put
25 in a proposal. If Johnny wants to buy a

Page 39

1 J. SIMPSON
2 car for \$5,000, we go into that system and
3 say Johnny Doe was here, he wants this, and
4 if he pays us money when we receive his
5 money if it's a wire transfer or it's
6 through credit card, it will go
7 automatically through there and then it has
8 a link that says send to QuickBooks. And
9 we can click yes.

10 So the folks that had been
11 working there do not know QuickBooks. So
12 the answer to the question specifically,
13 they're not bookkeepers; but if you're
14 asking me for people who have touched
15 money, right, and who have done the process
16 that's just described as we possibly have,
17 99 percent of our money that we take is
18 through wire transfers. We have a standard
19 to wire transfers or if it's through credit
20 card, it would go directly through the
21 system called Shopmonkey it could go to the
22 bank.

23 So the bank records, which I
24 believe you have, would have all the
25 transactions that would occur there. So

Page 40

1 J. SIMPSON
2 individuals in the office there that if
3 you're asking their names of the people
4 that know how to do what I just described
5 which is not going into QuickBooks and
6 doing entries because they're very
7 different role -- I'm just trying to
8 understand your question -- because there
9 is no other person at this time who is
10 doing entries into QuickBooks other than,
11 again, by the nature of the system I
12 described where it says record this in
13 QuickBooks. You click the button yes. I
14 myself have done a lot of that on my own.
15 So is that answering your question?

16 Q. That does not answer my
17 question, Mr. Simpson.

18 A. Do you want a list of people
19 who have touched the system I'm describing?

20 Q. Well, let's --

21 A. I give you the system. That's
22 what it is.

23 Q. Let's just start with, is there
24 any dedicated bookkeeper at Rever Motors?

25 A. No.

Page 41

1 J. SIMPSON

2 Q. Who are the employees of Rever
3 Motors presently?

4 A. A list of every one of them?

5 Q. Yes. Please give me a list of
6 employees of Rever Motors.

7 A. I can't give you their full
8 names. I can give you the names of the
9 people. I have to look up their full
10 names. Payroll report can do that. If you
11 want, I can give you a payroll report.
12 That will be easier than me trying to list
13 their names with the spellings.

14 Q. Mr. Simpson, you're managing
15 this business, right?

16 A. Yeah.

17 Q. And you've been managing this
18 business for quite sometime?

19 A. Yeah.

20 Q. And so are you telling me that
21 you can't tell me the names of the
22 employees of the business?

23 A. I can. But many of them have
24 three and four names. They're not even
25 English speaking, and their name on the

Page 42

1 J. SIMPSON
2 bookkeeping versus the name or the payroll
3 I should say and the name what they go by
4 are different. So I can list them out for
5 you if I want to know to name of people --
6 what I refer to them as and they asked me
7 to be referred to, sure. But I can't give
8 you the last names off the top of my head,
9 I'm sorry.

10 MR. LORENC: Would that be
11 acceptable?

12 A. I can walk you through them if
13 you like.

14 Q. I would like you to give me a
15 list of the people working at Rever Motors
16 presently that you can -- that you know
17 their names?

18 A. Again, I'll give you a payroll
19 report with the full names. I do not know
20 the full names off the top of my head.
21 These are not office workers. These are
22 people that are doing different type of
23 tasks who we don't have email exchanges
24 because there's no email. They don't use
25 any communication other than they come to

Page 43

1 J. SIMPSON
2 work, they're hourly workers, and they
3 punch the clock; and I find it hard to
4 believe even in the Wieners lighting
5 business they would know every person's
6 full name. It's just not how it's done.

7 Let me go through with you the
8 list of people. Let's do that, okay? And
9 I'll tell you the roles, how about that.

10 So I'll tell you, for example,
11 a painter his name is Luis. But he doesn't
12 actually go by Luis. He has a different
13 name he goes by on his payroll statement
14 that has -- I don't remember the two names
15 before, but the last name is Camacho
16 (phonetic) as an example, okay? This is
17 what you're going to see as a trend because
18 they tend to go by different names some of
19 them. Not all of them. There is an
20 individual who does metal work for us. His
21 name is Molik. I don't remember if it's --
22 I think it's M-O-L-I-K. I don't know if
23 there's an E in there. Again, I can give
24 you a payroll report. Everybody we have
25 working there is on the books. It's all

Page 44

1 J. SIMPSON
2 legit. Payroll reports would have the full
3 names. We have -- so that's two people.
4 We have a gentleman named Jose. I do not
5 know his last name who does a variety of
6 miscellaneous work, hourly guy.

7 We have a gentleman named
8 William, has three last names that just are
9 Spanish words that I can't -- off the top
10 of my head I can look for them through the
11 payroll report.

12 We have an individual named
13 Paolo. Again, I don't know his last name
14 off the top of my head and I think his
15 first name is a second first name as well.
16 I'm just giving you the names that when we
17 see them and you can see my hands
18 (indicating), I work with these guys a lot.
19 That's the names they go by. They go by me
20 as Jeff. They don't even know my last
21 name. That's just the hourly workers I've
22 ever worked. Same as construction.

23 And then there's -- let me see,
24 go through everybody. We have Jose. We
25 have William. We have Paolo. We have --

Page 45

1 J. SIMPSON
2 in the office I have a gentleman named
3 Jackson Whitehead (phonetic), again,
4 because I email with him, it's easier. And
5 then just someone started recently part
6 time, her name is Maya -- it starts with a
7 C. I have to find her last name, but she
8 just graduated high school. She's
9 interning for us, you know, four or five
10 hours a day when she can.

11 As far as employees go, that's
12 pretty much it. If I pulled a payroll
13 report for you today, I can give you a
14 payroll for today or last week or last
15 month. I don't care. It's all in the
16 payroll reports.

17 Q. Do any of these people do
18 bookkeeping for you?

19 A. No. I said to you bookkeeping
20 is done through the system as I described,
21 right, which is the Shopmonkey system which
22 I do all the service writing myself; so any
23 new proposals are written by me. I can't
24 say all. Majority of them unless it's an
25 ad hoc thing. We don't do very many

Page 46

1 J. SIMPSON
2 proposals. We only do three or four a
3 week. Sometimes only two a week because we
4 only take out big projects at this point.
5 And I would write the proposals. I
6 circulate them through the system to the
7 clients. The clients generate dialogue
8 through the system; and if we make
9 payments, it would come up either through
10 the bank report. Sometimes it's Zelle or
11 sometimes it's credit card and the credit
12 card goes directly to the system. So the
13 individuals who are there, I can ask them
14 to check and see if a payment came in or
15 not; and that's sort of the extent of it,
16 of people that are on payroll for doing
17 that.

18 Q. Does Yael Simpson work at Rever
19 Motors?

20 A. She does not. She's helped
21 occasionally where if someone left or there
22 was a gap where we need to check that the
23 bank was up to date or things like that,
24 but she's not an employee. She's never
25 gotten a dollar. She's not on the payroll.

Page 47

1 J. SIMPSON

2 She has volunteered to help wherever she
3 can where I need help because look at the
4 hands (indicating). I'm doing the work
5 myself, and that's just where we are.

6 Q. What about David Simpson, does
7 he work at Rever Motors?

8 A. David Simpson did work at Rever
9 Motors. He hasn't -- he got paid for
10 working there -- let me be clear. He got
11 paid for working there in the summer of --
12 let's see, 2025. Not last summer. I would
13 say '23 I think he worked there, maybe 16
14 in the summer. 15 or 16 got paid for being
15 on the payroll. He's helped me
16 occasionally between now and then. He does
17 not get paid. He is not on the books. He
18 has taken phone calls for me, et cetera, to
19 give me a hand. He's in college, full time
20 at college at Lehigh. He's not on the
21 books. He's not working.

22 He's been home for college for
23 three days, like in anyone's family I would
24 think would give a hand to their dad and
25 that's what he does; but it's not in a way

Page 48

1 J. SIMPSON

2 he gets compensated for it.

3 Q. When was the last time he did
4 get compensated?

5 A. I have to look. I have to
6 look. I would say that it would be not
7 this calendar year. It probably would be
8 '23, but there's a possibility if he worked
9 a full week and he did put in a full week
10 we would have to pay him. I have to check,
11 but it's not of any substance; and it's not
12 any regular interval, but he did -- I mean,
13 he basically ran the place when Jared and I
14 had no time for it and we first bought the
15 place and the numbers were amazing. He was
16 15 years old, and he did get paid the
17 minimum wage. Whatever minimum wage was, I
18 literally said that that's what he's going
19 to get paid and that's what he got.

20 Q. Let me just -- I want to just
21 circle back to, you had mentioned
22 Mr. Kennedy before.

23 A. Yes.

24 Q. And you had mentioned he had
25 provided a list?

Page 49

1 J. SIMPSON

2 A. Yes.

3 Q. What was on that list?

4 A. The list of the various JJ
5 entities that he has done the tax returns
6 for in the past and any returns that he
7 knew of because I would like to get my own
8 tax returns done because it has issues for
9 me too and trying to figure out where the
10 gaps, right, part of the issue has been as
11 he even pointed out, he never did my
12 personal tax returns. He got close to it.
13 He did the JJ Arch returns; but he,
14 himself, could not do the JJ Arch returns
15 if, for example, Citrin Cooperman did not
16 do a return that was at another real estate
17 level.

18 So his list was pretty much
19 everything he knew of and I believe there
20 was even a list done by Yechield Lehrfield
21 in the past.

22 (Reporter clarification.)

23 A. Y-E-C-H-I-E-L-D. And
24 L-E-H-R-F-I-E-L-D. And Yechield was our
25 controller. Yechield used to keep even

Page 50

1 J. SIMPSON
2 like a tracker of all of the entities
3 because there are so many entities from the
4 tax returns.

5 Q. But just to be more specific,
6 did he give you a list of the tax returns
7 that had not yet been filed that are
8 outstanding?

9 A. Yes.

10 Q. And what was on that list --

11 A. I can't tell you. I don't know
12 the list. Give you a copy of it. Nothing
13 to hide. We can do it here today.

14 Q. We're going to request and
15 demand that you give us that copy.

16 A. Mr. Lorenc already said he
17 would just like I already said I would.

18 Q. Do any of the other JJ Arch
19 controlled entities have bookkeepers?

20 A. No.

21 MR. LORENC: Can I have a
22 clarity definition of --

23 Q. When I say JJ Arch controlled
24 entities, I'm referring to 225 HPR LLC,
25 1640 Montauk LLC, JJNY 550 LLC, and each of

Page 51

1 J. SIMPSON
2 the three Borrower 1, Borrower 2, Borrower
3 3 LLC, specifically 146 East 89 Borrower 1
4 LLC, 146 East 89 Borrower 2 LLC, and 146
5 East 89 Borrower 3 LLC. That is who I
6 referred to as the JJ Arch controlled
7 entities --

8 A. Yes.

9 Q. -- in addition to 1640 Motors
10 LLC.

11 So with that being said, do any
12 of these entities have a bookkeeper other
13 than the people you mentioned vis-à-vis
14 Rever Motors?

15 A. Rever Motors people do not
16 touch those things. Let's be clear. They
17 do not -- and I keep it segregated on
18 purpose because that's what it's supposed
19 to be. And let's also be clear regardless
20 of Ms. Thorne or Mr. Wiener's opinion on
21 this, the JJ entities under Chassen's
22 direction and mine were handled in-house at
23 Arch. We did handle that stuff because it
24 was my company, so we can all dispute it;
25 but Arch itself handled the books.

Page 52

1 J. SIMPSON

2 Yes, ma'am, it was my company.

3 It is my company. Read the documents.

4 Your client five years ago was ca-poof,
5 right, five years, goodbye, okay. And they
6 admitted they were out. Yes, keep smiling.

7 Let's go. Let's go. You can't actually
8 speak today. I know. So it is my company.
9 Let's look at every document. Let's look
10 at the tax returns where they told me it's
11 80 percent my company. That they issued to
12 me, okay? So yes, it's my company; and
13 yes, we did a lot of stuff for Wiener too
14 in case you're wondering that we didn't
15 charge for, but we're not going there right
16 now. Lots and lots of stuff for the
17 Wieners, lots and lots of stuff, right, but
18 we're not going to go there right now.

19 So to the answer your question
20 is that we did segregate the costs, right.
21 If there were costs that were related to a
22 JJ Arch process, we would not stuff it onto
23 an AREH issue. Everything was separate in
24 our business. We will hopefully depose
25 those people like Yechiel Lehrfield. He

Page 53

1 J. SIMPSON
2 will tell you that we did not co-mingle it.
3 It was kept separately; and if there was a
4 cost allocated for a person at AREH to do
5 JJ work, it would not be stuffed under
6 AREH. But we did have it under the
7 conglomerate for the various reasons which
8 Mr. Chassen suggested years back like the
9 following: We had a member loan from the
10 Oak folks 608941 of \$3 million, and we can
11 draw on this money if we needed it; and we
12 spent five years staying far away from
13 those moneys.

14 So Chassen and I gave hundreds
15 of thousands of dollars to the various
16 businesses, if it was AREH, if it was JJ
17 Arch, and Mr. Lehrfield had full access to
18 our bank accounts. So he just pulled money
19 when we needed it, and we had no issue with
20 Chassen. We all trusted each other.
21 Unlike her client there while you're
22 smiling who I don't trust. Mr. Lehrfield
23 would keep track of the funds, and he kept
24 very good books on everything; and he
25 decided to leave in May of 2023.

Page 54

1 J. SIMPSON

2 But to be very clear, he used
3 the funds that we had personally; and he
4 moved it up and down in accounts. He
5 oftentimes told us. Sometimes he didn't,
6 and the trust was so large where
7 Mr. Lehrfield was directed by me where I
8 said if you need to take my money just
9 leave enough that I have to live from, take
10 whatever you need for Arch so Arch can
11 live.

12 So the \$3 million loan, for
13 example -- and Mr. Chassen could report to
14 this as well -- he'll even tell you at one
15 point his mother gave a loan which I did
16 not approve. I did not ask for of several
17 hundred thousand dollars to make certain
18 costs because we did not want the 608941's
19 moneys because we knew this would happen
20 like her expression over here (indicating)
21 with the way that they acted. So we did --
22 we tried and there's even balances that
23 have been put on the record to show those
24 numbers were low.

25 So to get to your point, the

Page 55

1 J. SIMPSON
2 moneys that were handled for these various
3 entities' requirements in order to have
4 that work in a system, right, someone like
5 Lehrfield who was using my personal money,
6 Jared's personal money to pay bills like
7 AREH overhead, which was segregated and
8 separate, he would need access. So he
9 would also with a staff member of his say,
10 all right -- because the bookkeeping was
11 not a lot. He would say, okay, well, 550
12 needs \$5,000 today. Simpson, Chassen, I'm
13 going to use your money and I'm going to go
14 that; and we would say, okay, it was never
15 AREH money. It was always segregated.

16 So that is how we worked for a
17 business that was run generally by two
18 people where he had direction under me
19 to -- he was really the one responsible for
20 all this just to be clear including the
21 Rever bookkeeping. Chassen was -- one of
22 his roles was to oversee this process.

23 One second, please.

24 So when whenever everything got
25 blown up, thank you to Mr. Thorne and her

Page 56

1 J. SIMPSON
2 client and your client for attacking my
3 business in 2023 and stealing my business,
4 it was abruptly stopped. It was just
5 stopped. It goes from having a team and a
6 system that worked without any defaults,
7 without any problems, to problems galore,
8 right?

9 And if you further the issue,
10 when her client improperly -- I'm sorry.
11 I'll finish when I'm done, okay? You want
12 me to speak so I'm just speaking. You're
13 going to let me finish.

14 Q. Mr. Simpson, my question was,
15 do the JJ Arch controlled entities have a
16 bookkeeper --

17 A. I'm giving you a history. I've
18 giving you the history. Today they do not,
19 no.

20 Q. And have they had one in the
21 last year?

22 A. No.

23 Q. Okay. And --

24 A. There's so few transactions.
25 What's a bookkeeper going to do? What's it

Page 57

1 J. SIMPSON

2 going to do?

3 Q. When was the last time they had
4 a bookkeeper?

5 A. Well, you can ask Mr. Chassen
6 about HPR -- no, no, no. He was
7 controlling it himself.

8 Q. When --

9 A. Excuse me, excuse me. Where
10 does the \$40,000 come from?

11 Q. Mr. Simpson, I ask the
12 questions here today. You're being
13 deposed.

14 A. Yeah. We'll depose you too for
15 your actions. But go ahead. For your
16 illegal activity and you're lying to the
17 Court. Go ahead. You too. You're lying
18 to the Court. We'll depose you too. Can't
19 wait. We'll have the bar association at
20 both of yours.

21 Q. Mr. Simpson --

22 A. Because you've lied. He just
23 did it last night. Go ahead.

24 Q. Mr. Simpson, when was the last
25 time the JJ Arch controlled entities had a

Page 58

1 J. SIMPSON

2 bookkeeper? When was the last time?

3 A. So Chassen had the moneys under
4 control on 225 HPR until -- no, no, no.
5 Don't shake your head -- until February of
6 2024. He controlled the moneys himself in
7 a segregated account. You can ask him that
8 question at 225 HPR.

9 MR. SCHWARTZ: I'm going to
10 move strike his answer as not being
11 nonresponsive.

12 A. No, no. It's not responsive.
13 It's a very specific answer. Jared
14 Chassen, 225 HPR is your answer.

15 Q. When was the last time that JJ
16 Arch controlled entities had a bookkeeper?
17 It is a --

18 A. JJ Arch doesn't have staff.

19 Q. So when was the last time that
20 it did?

21 A. JJ Arch has never had staff.

22 Q. So --

23 A. There has never been a staff
24 member at JJ Arch that existed, not one.

25 Q. So has it ever had a

Page 59

1 J. SIMPSON

2 bookkeeper?

3 A. Yes. The bookkeepers were
4 folks that we had in affiliation with JJ
5 Arch's 80 percent ownership of the AREH
6 that was done in our office. There's no
7 question of that's how it was done. You
8 can keep smiling. It's a fact. It's my
9 business, lady. It's all mine. It always
10 was other than your bullshit to the Court
11 that you lied consistently for in your
12 affidavits. It's all mine, so you can keep
13 playing your game.

14 But go ahead. Keep smiling. I
15 don't even know why you're here. Who
16 invited here? We weren't told she was
17 here. She wasn't invited. No one gave me
18 any guidance other than Mr. Schwartz.

19 Q. Mr. Simpson, would it be fair
20 to say that --

21 A. JJ Arch has no employees ever.
22 Chassen is the closest thing we had to an
23 employee.

24 Q. So would it be --

25 A. My direction.

Page 60

1 J. SIMPSON

2 Q. -- fair to say it hasn't had
3 bookkeeper since at least August of 2023?

4 A. I would say that there had been
5 bookkeeping that has been done when I can
6 do it occasionally throughout the process,
7 again, if you look at the properties, they
8 don't have any books to do, right, for
9 example, Head of Pond, Chassen was doing
10 Airbnb. He did his own keeping of that. I
11 asked for it, never gave it to me --

12 Q. Mr. Simpson, I'm asking -

13 A. I'm giving you a question.
14 Chassen. That's your answer.

15 Q. I didn't --

16 A. Chassen is 550 and 225. When
17 is the last time Chassen stopped keeping
18 track of those two? You would have to ask
19 him, but he was responsible for those two
20 properties and keeping track of the books.
21 You can ask Mr. Chassen on those two.

22 And Rever Motors, as I've told
23 you, right, right, we are catching up on
24 the QuickBooks. It's been sporadic, right.
25 We are working as hard as we can to catch

Page 61

1 J. SIMPSON
2 up those books. We have a lot of problems
3 with QuickBooks logins. Thank you to the
4 various folks at everything related to that
5 lady next to you, which is Oak for messing
6 with our systems and causing problems,
7 yeah, yeah. You destroyed everything.
8 Everything was great before you showed up.
9 Especially you. Everything was wonderful
10 until you showed up. You and your friend
11 Brad, right, your deceit.

12 MR. LORENC: Jeff.

13 A. So to answer your question, we
14 had it under control until the takeover
15 occurred; and since then, Chassen has, I
16 believe, until February of 2024, he had
17 full access to 225 HPR holding hostage,
18 there's emails about it. And he finally
19 relinquished whatever he had in
20 February/March of 2024.

21 Q. But be that as it may --

22 A. You asked me the various
23 properties. JJ Arch has no employees.

24 Q. I asked you about
25 bookkeeping --

Page 62

1 J. SIMPSON

2 A. JJ Arch does not have
3 bookkeepers or employees. Individual
4 entities were bookkeeped by different
5 people, so I'm telling you at Rever it's
6 done in-house, right, by the various people
7 are doing the parts they can. I oversee
8 where I can. I know that we are properly
9 looking at every bank statement checking
10 the expenses; and then as it relates to
11 89th Street, there hasn't been any expenses
12 that haven't been paid out in a number of
13 months, right.

14 There just hasn't been funds
15 for it. And I have countless emails to
16 show that no one wants to put money in
17 including Chassen, including Mr. Peldman,
18 including Ms. Miller. Nobody will put a
19 dollar into it. So what bookkeeping am I
20 going to do when there's no transactions?

21 Q. Mr. Simpson, have you provided
22 any documents to Mr. Kennedy in connection
23 with your request that you made to him
24 about JJ Arch past and present tax returns?

25 A. We're not at the stage. We're

Page 63

1 J. SIMPSON
2 at the stage of, he gave me the
3 reconciliation of all the various entities
4 including all the JJ investment entities;
5 and he gave me what he has done to date,
6 what's completed. And the next stage is
7 when I sent him a check because in my own
8 good will I'm not going to ask him to do
9 much more until I write him another check,
10 right, which I believe we sent him some
11 money.

12 Chassen and I did -- I think
13 even in one of our settlement negotiations,
14 we gave him some money probably about a
15 year ago. I think you were involved in
16 that conversation. I believe he gave some
17 money at the time. I have to check and
18 confirm. We definitely gave one of the
19 parties who was owed money some money at
20 the time.

21 But my view is, I have to catch
22 him with cash, which I have every intention
23 to do as Mr. Lorenc said; and once I do, I
24 will go through dialogue with him on giving
25 him whatever he needs to finish those

Page 64

1 J. SIMPSON

2 processes.

3 Q. So you haven't provided him
4 documents as of today?

5 A. You can't ask people to do
6 documents when you're not in -- at that
7 stage of the game.

8 Q. So you haven't --

9 A. He hasn't asked me for it.

10 Q. You're interrupting my
11 questions.

12 A. He hasn't asked for it. So ask
13 real questions.

14 Q. So you haven't provided him
15 documents as of today?

16 A. He hasn't asked.

17 Q. The answer is yes or no.

18 So you haven't provided him
19 documents as of today?

20 A. There's no documents that have
21 been provided. I don't have any requests.
22 And to be clear, just so we are all on the
23 same page yet again, JP Morgan which
24 continues to be an issue doesn't provide
25 information that we need to do these

Page 65

1 J. SIMPSON

2 things.

3 So as your client has seen and
4 I've seen, they send us stuff that doesn't
5 appropriately go to one another. So that's
6 part of the process, so let's also
7 recognize that.

8 Thank you, Ms. Thorne. Thank
9 you the Wieners for messing with JP Morgan
10 and Mr. Chassen for messing with First
11 Republic because that is still an utter
12 mess causing issues for us to do any
13 reconciliations.

14 Q. All right, Mr. Simpson. I
15 would like to turn your attention to the
16 exhibit on your Screen what was marked C2
17 and take you to request number 8. If you
18 can see that Paragraph No. 8, it says -- it
19 requests all bank statements for the bank
20 accounts belonging to, one, JJ Arch LLC,
21 two, 225 HPR LLC, three, 1640 Montauk LLC,
22 four, 1640 Motors LLC, five, JJNY 550 LLC,
23 six, YJ Simco, LLC, seven, 88 Schwenks LLC,
24 eight, Jeffrey Simpson, and, nine, Rever
25 Motors.

Page 66

1 J. SIMPSON

2 Do you see that?

3 A. I'm looking at the document.

4 Bear with me, please. (Perusing). Can you
5 give me a page number, please?

6 Q. Page 11.

7 A. Okay, yes. I see it.

8 Q. Have you provided all bank
9 statements as requested in this document
10 request to Mr. Chassen?

11 A. It's my understanding that
12 Mr. Lorenc and I were working toward a
13 response as to what we object in your
14 discovery request; and, unfortunately, that
15 response that him and I are working on got
16 off track because of the settlement
17 discussions that it's unclear if they were
18 intentionally good or if they were not
19 good.

20 So we had every intention, and
21 I don't know if Mr. Lorenc can comment or
22 not, but we had every intention of
23 responding to which of these thing we were
24 going to produce and which we are not. So,
25 yes, in the meanwhile we are producing

Page 67

1 J. SIMPSON
2 portions of the list and I don't believe
3 today is the right -- I mean, I believe
4 there's an order that suggests how we
5 respond to your list of requests and if
6 those requests are going to be objected to
7 were provided.

8 Q. Have you ever produced bank
9 records from Citizens Bank that are in the
10 name of 1640 Motors LLC to Mr. Chassen?

11 A. I've offered him login multiple
12 times over the last year.

13 Q. That wasn't the question.

14 The question is, have you ever
15 produced the bank statements for 1640
16 Motors --

17 A. We don't do paper. It's
18 electronic. So he had access to it. So
19 the answer is yes, he had electronic
20 access.

21 Q. So have you ever downloaded the
22 bank statements from 1640 Motors LLC's
23 account at Citizens Bank?

24 A. No. I don't download the bank
25 statements, no.

Page 68

1 J. SIMPSON

2 Q. Are you able to download the
3 bank statements?

4 A. I am. I am. And he has access
5 too --

6 Q. Excuse me.

7 Have you ever downloaded those
8 bank statements and then provided those
9 bank statements to Mr. Chassen?

10 A. No. And I don't need to. I
11 need to give him view access. That is the
12 requirement of the Court is view access and
13 I have given him view access for a year --

14 (Reporter clarification.)

15 A. I've given him view access for
16 a year, and yesterday, again, for the
17 fourth time I gave a screenshot of his view
18 access and the bank woman responded. Her
19 name is Shradha Lama, nice lady. She
20 responded saying that she can't do anything
21 on her side, and Chassen was put on there.
22 You were put on there saying if you have a
23 glitch to call me. He has never called me
24 since the last time I gave him the login
25 access.

Page 69

1 J. SIMPSON

2 Q. We'll get to that later,
3 Mr. Simpson.

4 A. You can as much as you want,
5 but view access is all he is required to
6 have and I have offered him --

7 Q. I asked a very --

8 A. No, I did not give him PDFs.
9 If that's your question, no. I did not
10 give him PDFs. I gave him access to the
11 bank account; and as I answered your
12 question on JP Morgan, my access is touchy
13 at best. I struggle myself to get access.

14 Q. I specifically asked you about
15 the Citizens bank account at 1640 Motors
16 LLC.

17 A. You read to me the list of bank
18 accounts.

19 Q. Yes. But my follow-up question
20 was --

21 A. Yes. He's been --

22 (Reporter clarification.)

23 A. We've granted him access
24 electronically for the entire time the
25 account has been in function, and I haven't

Page 70

1 J. SIMPSON

2 heard a peep about it until these attacks
3 in Court recently yet again.

4 Q. All right. We'll discuss that
5 later, Mr. Simpson.

6 A. Love to. Can't wait.

7 Q. Mr. Simpson, can you tell me
8 what companies JJ Arch LLC presently owns
9 and controls?

10 A. So JJ Arch LLC has -- so it
11 owns a hundred percent membership interest
12 in 1640 Montauk LLC and 1640 Motors LLC.
13 It has a hundred percent interest. It's
14 the sole member of 225 HPR LLC. I don't
15 know if we have taken the 88 Schwenks,
16 S-C-H-W-E-N-K-S, LLC asset that was
17 disposed. I don't recall if we've ever
18 shut down the LLC or not, but there's
19 nothing there anymore. That had another
20 partner to be clear, so it wasn't a hundred
21 percent owned. It had another partner
22 there.

23 Then JJNY 550 LLC is a hundred
24 percent membership interest in JJ Arch; and
25 then from there -- 1640 Montauk -- Motors,

Page 71

1 J. SIMPSON
2 550, 225 -- and then from there there was a
3 variety of JJ investment entities across
4 all of the properties at Arch that are as
5 the term is owned or controlled under JJ
6 Arch LLC, and I can't list them off the top
7 of my head.

8 Q. I specifically asked about the
9 companies that JJ Arch presently owns and
10 controls, presently.

11 A. It presently owns and controls
12 those JJ investments and Arch. Regardless
13 of what she thinks, they do. Read the
14 documents.

15 Q. What about 146 East 89th
16 Borrower 1 LLC?

17 A. It doesn't own it in full.
18 There's -- so 146 East 89th Street is a
19 tenant in common structure that there's two
20 versions that exist, and I can't say for
21 certain which version is the final version
22 because the bank asks for a restructure
23 because of the tenants in common are the
24 guarantee.

25 So in all circumstances,

Page 72

1 J. SIMPSON
2 there's nowhere where JJ Arch owns a
3 hundred percent so meaning, the two Peldman
4 brothers have two separate entities that
5 were part of the tenants in common, TIC;
6 and in addition on the side where JJ Arch
7 had an investment, Michelle Miller and -- I
8 have to look and see who else. I think
9 there may be one or two other people that
10 were employees that invested small dollars.
11 Michelle's investment was significant,
12 invested as well. So JJ Arch itself did
13 not full control -- I'm sorry. Full
14 ownership. Control, yes.

15 JJ Arch LLC has control of that
16 similarly to the JJ investment entities as
17 relates to AREH. It does not own them
18 entirely because it can't because it has
19 other investors, right, family members, et
20 cetera, there's a bucket of investors; but
21 it does control those so called JJ
22 investment entities in theory.

23 Q. Does it control 146 East 89
24 Borrower 1 LLC?

25 A. As I just told you, it has

Page 73

1 J. SIMPSON
2 control; but it's ownership is different
3 from 1, 2, and 3 based upon the tenants in
4 common.

5 Q. But does it also control 146
6 East 89 Borrower 2 LLC?

7 A. I believe so.

8 Q. And what about 146 East 89
9 Borrower 3 --

10 A. I believe so. I believe so.

11 Q. -- LLC?

12 A. As a control, I believe it
13 does. It doesn't own them.

14 Q. So it does control 146 East 89
15 Borrower 3 LLC also?

16 A. I believe so. Again, there's
17 two forms of documents that exist that are
18 both executed, and I'm unclear as to which
19 one is the final version.

20 Q. Where does JJ Arch LLC have
21 bank accounts?

22 A. The only bank accounts that
23 exist are, JJ Arch itself today just JJ
24 Arch, I don't think even has an existing
25 bank account at this time because of what

Page 74

1 J. SIMPSON

2 happened with JP Morgan; and if you recall
3 during the bankruptcy, we even made a
4 motion to have JP Morgan --

5 Q. I'm not interested in them --

6 A. I'm answering your question. I
7 don't know if it's active because we could
8 not get JP Morgan to give us any clarity on
9 that bank account when we had the
10 bankruptcy, so JJ Arch itself today as
11 struggled to get any bank accounts as a
12 result of all this; so there is no active
13 bank account that I have access to for JJ
14 Arch itself unfortunately.

15 Q. Okay. And what about 225 HPR
16 LLC, where does it have bank accounts?

17 A. It would be, again, JP Morgan.

18 Q. And what about 1640 Montauk
19 LLC; where does it have bank accounts?

20 A. That one -- 1640 Montauk one of
21 one at JP Morgan inactive because of
22 various reasons as described, and 1640
23 Motors would have an at JP Morgan I don't
24 believe was ever closed; and it's only
25 active account at the moment is Citizens.

Page 75

1 J. SIMPSON

2 Q. Does 1640 Montauk have any
3 accounts outside of JP Morgan?

4 A. No.

5 Q. What about JJNY 550 LLC, where
6 does it have bank accounts?

7 A. JP Morgan. You know what, I'm
8 sorry, I'm sorry. It's possible, and I
9 have to look, ConnectOne Bank at one
10 point -- ConnectOne Bank and it's not
11 active today when they sold their loans.
12 They just ditched us, again, because it's
13 litigation thank you to all. JJ550 was --
14 it did have a bank account at 550 -- I'm
15 sorry.

16 At ConnectOne Bank, 550 had
17 ConnectOne Bank because in compliance with
18 the loan that they did for us, they
19 required us to have a bank account there.
20 89th Street also had a bank account at one
21 point which I don't believe is active
22 anymore at ConnectOne Bank because against
23 they provide the loan there. So since the
24 loan sales have happened, it has been
25 another mess.

Page 76

1 J. SIMPSON

2 MR. LORENC: Point of clarify,
3 I'm sorry, can you go back two
4 questions, Allen, I believe you had
5 asked 1640 Montauk had no accounts
6 outside of JP Morgan. I just want --
7 or was it Motors had no accounts
8 outside of JP Morgan?

9 MR. SCHWARTZ: I said it was
10 Montauk.

11 MR. LORENC: Montauk, okay.
12 Thank you. I just want to make sure
13 the testimony was accurate before.

14 MR. SCHWARTZ: If you want to
15 take break right now, Mr. Simpson,
16 you can or we can go for another ten
17 minutes.

18 A. Keep it coming. I'm good.

19 Q. Mr. Simpson, where do 146
20 East 89 Borrower 1 LLC have bank accounts?

21 A. I have to look. Again, I know
22 that ConnectOne Bank was where we had our
23 activity, there hasn't been a transaction
24 in months under these accounts. There
25 hasn't been anything. There hasn't been

Page 77

1 J. SIMPSON

2 ins or outs. There's no money, so the last
3 bank account that I recall off the top of
4 my head is ConnectOne Bank which Chassen
5 had access to.

6 Q. But you don't recall today that
7 that account is still active?

8 A. It should be, but we haven't
9 done anything with it in the many months.
10 There hasn't been any transactions.

11 Q. And what about 146 East 89
12 Borrower 2 LLC?

13 A. I don't believe we had bank
14 accounts for those. I don't think it was
15 necessary. I believe it was only number
16 one was the managing member and the other
17 two were not required to have bank accounts
18 if I recall. Nothing ever existed.

19 Q. What about 146 East 89 Borrower
20 3 LLC?

21 A. I don't believe it was
22 necessary. I believe that Borrower 1 was
23 situated where for simplicity that it had
24 the managing member capacity that we didn't
25 need to ever have bank accounts; but it was

Page 78

1 J. SIMPSON

2 done under number one, if I recall.

3 Q. Does Jared Chassen have
4 realtime viewing access to all the accounts
5 for JJ Arch LLC?

6 A. Yes.

7 Q. What about for 1640 Montauk
8 LLC?

9 A. Yes.

10 Q. What --

11 A. Montauk is part of JP Morgan.
12 If you're asking me Motors or Montauk?
13 What are you asking me now?

14 Q. I asked you Montauk.

15 A. Montauk would be, again, would
16 be JP Morgan so, yes.

17 Q. What about for 225 HPR LLC?

18 A. He had the same access I do.
19 JP Morgan, yes.

20 Q. What about JJNY 550 LLC?

21 A. Same access I have.

22 Q. What about 1640 Motors LLC?

23 A. Same, everything. I've never
24 stopped him having access to anything.

25 Q. So -- and that would include --

Page 79

1 J. SIMPSON

2 A. The only bank account -- just
3 to be clear, the only bank account that's
4 ever been created outside of his purview
5 was the one at Citizens which we gave him
6 access immediately. Regardless if you
7 think we did, we did; and I have proof, but
8 okay.

9 Q. So it is your contention that
10 he does have --

11 A. Yes.

12 Q. -- access to the account --
13 (Reporter clarification.)

14 Q. It is your contention that
15 Mr. Chassen does have access to the bank
16 account at Citizens Bank in the name of
17 1640 Motors LLC?

18 A. Yes, it is.

19 Q. Are you familiar with an entity
20 named YJ Simco LLC?

21 A. I am.

22 Q. Who are its members?

23 A. Yael Simpson, my wife and me.

24 Q. And where does it bank?

25 A. I believe only at Chase, JP

Page 80

1 J. SIMPSON

2 Morgan Chase. It was First Republic.

3 Q. So besides for Chase Bank, you
4 are not aware of any other bank accounts
5 for JC Simco LLC?

6 A. No, no.

7 Q. What about JSS Strategies LLC,
8 are you familiar with that company?

9 A. It was a new LLC, but it's
10 inactive. No bank account.

11 Q. And who are the members of JSS
12 Strategies LLC?

13 A. It was going to be me only, but
14 I don't think I ever did an agreement for
15 it. It was just an idea I had of something
16 that hasn't really gone anywhere. I think
17 I filed the LLC, but that's about as far as
18 it intent.

19 Q. Does it have bank accounts?

20 A. No.

21 Q. What about JJ Asset Management
22 LLC, are you familiar with that entity?

23 A. That was -- that's not me. No.
24 It's not me. There's -- it's someone that
25 I -- that I helped do a consulting

Page 81

1 J. SIMPSON
2 assignment for. That's it. It's not
3 Jeffrey Simpson. It's a different person.

4 Q. How much revenue has JJ Arch
5 LLC made since the dismissal of the JJ Arch
6 bankruptcy?

7 A. I don't know off the top of my
8 head. There's not a number I have in my
9 head.

10 Q. Is it less than a thousand
11 dollars?

12 A. In net profit?

13 Q. Revenue.

14 A. Gross revenue?

15 Q. Gross revenue.

16 A. So it would be a culmination of
17 the various entities, so the only one
18 that's producing any income at the moment
19 is 1640 Motors; and I can't say it's at,
20 you know, profit but 1640 Motors does bring
21 in revenue of call it -- if I had to guess
22 between 50 and a hundred thousand dollars a
23 month of revenue, gross revenue. I can't
24 say that's net in any way but, yeah. I
25 mean, there's no revenue at any of the

Page 82

1 J. SIMPSON

2 other assets at the moment.

3 Q. So let's just do a one by one.

4 How much gross revenue has JJ
5 Arch itself made since the dismissal of the
6 JJ Arch bankruptcy?

7 A. There hasn't been a
8 distribution to JJ Arch itself that I'm
9 aware of in quite sometime. The entities
10 below it don't have enough to fulfill their
11 obligations to go up above.

12 Q. So would the answer be zero?

13 A. It would be zero.

14 Q. And how much gross revenue has
15 225 HPR LLC made since the dismissal of the
16 JJ Arch bankruptcy?

17 A. It's unoccupied, so zero.

18 Q. And how much revenue --

19 A. It wasn't occupied before it
20 either, but okay. Other than Chassen's
21 holding hostage, but go ahead.

22 Q. How much revenue has 1640
23 Montauk LLC made since the dismissal of
24 the JJ --

25 A. It's consistent. It hasn't

Page 83

1 J. SIMPSON

2 changed. None of those assets have
3 changed, bankruptcy or no bankruptcy. The
4 numbers have not changed at all.

5 Q. What were those numbers?

6 A. I told you. 1640 Motors, I
7 said to you fifteen hundred thousand
8 dollars a month, the bankruptcy has had no
9 impact on the revenue on any of those
10 assets.

11 Q. Well, I'm not asking about 1640
12 Motors. I'm asking about 1640 Montauk LLC.

13 A. It didn't have enough to cover
14 prior to the bankruptcy or post bankruptcy.
15 So what would happen would be, you have
16 enough income that comes in; and the income
17 pays rent. I mean, you should know this.
18 Your client set this up with me. It's all
19 public in the -- pay rent. 1640 Motors
20 would pay rent to 1640 Montauk. That's
21 what the bank asked us to do. Then when
22 the rent came in for 1640 Montauk, that
23 money would then go to the lender. It was
24 paying -- it's -- it's loan obligations I
25 would say approximately February/March of

Page 84

1 J. SIMPSON

2 2024. And since then the loan's been sold,
3 and it was nearly impossible -- I still
4 don't have invoice from the new lender. We
5 didn't know who the new lender was until
6 October or November of 2024, just a few
7 months ago, when the loan was sold.

8 Q. So 1640 Montauk was paying the
9 lender on the mortgage until February or
10 March of 2024?

11 A. Yeah. I believe right around
12 that time before the loan was sold. It was
13 keeping up. It might be a month or two
14 off. I don't know off the top of my head;
15 but when the loan was sold we asked who the
16 lender was. I have countless emails I
17 think I put on the docket. I didn't know
18 who it was sold to until maybe September,
19 October of 2024. They still have yet to
20 send a bill. We've asked for bills.
21 They're not sending any information, the
22 new lender.

23 Q. So just to step back.

24 Again, how much revenue, gross
25 revenue, has 1640 Montauk LLC made since

Page 85

1 J. SIMPSON

2 the dismissal of the --

3 A. It was zero before. It was
4 zero after.

5 Q. Okay.

6 A. No respective -- bankruptcy has
7 zero to do with any of this. It hasn't
8 changed any of those assets. Zero -- and
9 nothing has changed at those assets as a
10 result of the bank -- to answer your
11 question, that's your answer.

12 Q. So would that be the same
13 answer, the zero would be the same answer
14 for JJNY 550 LLC?

15 A. It's been vacant for other a
16 year, correct.

17 Q. And what about for 146 East 89
18 Borrower 1, 2, and 3 LLC?

19 A. Right. So that in November --
20 way before the bankruptcy, November of
21 2023, the lender sold the loan and it has
22 had no income because it was a project and
23 it had a new loan. Thank you Mr. Chassen
24 and Mr. Peldman for blowing that up, but we
25 had a way to fix it; and we were unable to

Page 86

1 J. SIMPSON
2 fix it. Again, prior to the bankruptcy.
3 Nothing to do with the bankruptcy, zero.
4 Irrespective of it. Nothing's changes in
5 those entities.

6 Q. So how much revenue, gross
7 revenue did JJ Arch make in 2024?

8 A. I just told you. It can't
9 clear its expenses. How is it making
10 revenue?

11 Q. So it was zero?

12 A. Yeah. Didn't make money.

13 Q. What about 1640 Montauk LLC in
14 2024, how much revenue did it make?

15 A. It didn't get to that point,
16 right. Again, as I told you, the 1640
17 Montauk was collecting rent, right, from
18 1640 Motors. Its only source of revenue
19 was rent from 1640 Motors or the department
20 that's owned -- it's part of it. It's not
21 segregated. There's an apartment upstairs,
22 1640 Montauk. If there was rent there,
23 that rent could go there but it all --
24 because they're an owner/operator, op co,
25 prop co company, right, they don't share

Page 87

1 J. SIMPSON

2 everything but the net -- you would have to
3 have enough money to cover payroll, right,
4 and cover the costs and then you have rent
5 to pay. The rent then from Motors to
6 Montauk would then pay debt service and
7 that's how we booked it for years, year and
8 a half, whatever.

9 Q. How much rent did 1640 Motors
10 pay to 1640 Montauk?

11 A. It didn't.

12 Q. Did it have pay rent to 1640
13 Montauk?

14 A. Absolutely.

15 Q. When?

16 A. In 2022, 2023, we started,
17 absolutely.

18 Q. And when did it stop paying?

19 A. Probably end of '23 right when
20 all this mess of litigation started.

21 Q. And why did it stop paying?

22 A. I'm sorry. I want to go
23 backwards. I think -- I want to say that
24 it paid rent. It may have paid rent a
25 little bit later than that. It may be

Page 88

1 J. SIMPSON
2 early 2024. Because it's struggling. It's
3 struggling because we had -- let's reflect
4 for a moment to answer your question.

5 JJ Arch had a guaranteed
6 payment that received Chassen and I for
7 those moneys that would come in. It was
8 basically our salary. That's how we got
9 money to live from. The JJ Arch funding
10 that I did not take for a number of months
11 which was all preapproved in my budget,
12 which there was never a peep about my
13 friends at the Wieners until they ran out
14 of money. Chassen received -- he put in
15 his own affidavits. He got \$600,000 a
16 year.

17 Let me finish the question,
18 please. You asked a question. You're
19 getting an answer, okay?

20 The moneys that we received is
21 our salary just like you or me or anybody
22 else here. You would use the moneys that
23 you make to put in your pocket to pay your
24 bills; and if you have companies and
25 properties you own and it doesn't have

Page 89

1 J. SIMPSON

2 enough to cover your bills, you take money
3 out of your pocket to pay it, which I've
4 always done. Clearly pay off Chassen's
5 \$500,000 debt.

6 So to answer your question,
7 when that was wiped out from me and the
8 Judge even said he was severely concerned
9 about how I pay my bills, right, and this
10 lady next to you, her client, was supposed
11 to paid me the guaranteed maximum, I mean,
12 the guaranteed payment pursuant to the
13 documents the day that the managing member
14 entity was no longer JJ Arch. Her client
15 refused to do it under multiple accounts.
16 Those funds would have been used by Chassen
17 or I to make up any negative carry cost
18 that would existed at the JJ properties.

19 So I would not own these
20 properties. I would never brought those
21 properties if I didn't have the revenue
22 that I had which was hard earned revenue
23 from the work I've done for all the years
24 I've done it, so there isn't funds
25 available for properties that are in

Page 90

1 J. SIMPSON

2 transition. You can shake your head all
3 you want.

4 Q. I'm not asking --

5 A. But I'm giving you the answer
6 to the real question. You're playing games
7 with me. The real question is, there isn't
8 money available.

9 Q. The real question I asked --

10 A. No, no, no. It's the source of
11 this litigation. What has happened here?
12 What's happened here is there's no money
13 available.

14 Q. I asked you a question.

15 A. It's a very gamey question. Go
16 ahead.

17 Q. My question was --

18 A. The question lies to the Court
19 countlessly.

20 Q. -- how much was 1640 Montauk
21 paying --

22 A. Tell me about your motion. Was
23 your motion -- your motion, your motion
24 that was supposedly you never dismissed but
25 it's on the docket. You dismissed it. So

Page 91

1 J. SIMPSON

2 you have no creditability to ask me any
3 questions. Go ahead.

4 Q. How much money in rent was 1640
5 Montauk LLC paying --

6 A. \$17,500 is the contractual rent
7 that it would pay it if it had the money to
8 pay it.

9 Q. Okay. And is that in a written
10 formal contract?

11 A. Yes. The lender asked for it.
12 There's a lease.

13 Q. And can you -- we would ask
14 that you produce that lease?

15 A. You have it. Absolutely.

16 Q. And your testimony is, is that
17 you stopped paying that reasonable
18 certainty or I should say -- strike that.

19 1640 Motors stopped paying that
20 rent in February or March of 2024, or was
21 it early 2023? Which one was it?

22 A. Not early 2023. It was late
23 2023. It would have been after this
24 takeover nonsense. Up until the takeover
25 everything in compliance, everything was

Page 92

1 J. SIMPSON

2 perfect.

3 Q. So it would be either late 2023
4 or early 2024?

5 A. That's right. After these
6 people took things over, everything went
7 bad.

8 Q. Okay.

9 A. So just to be clear, it's not
10 the bankruptcy. It's her and your takeover
11 happened August 2023. That's the
12 trigger -- no, no, no. That's going to be
13 on the record. That's going to be on the
14 record. That's what caused these problems.
15 Everything was beautiful until then.

16 Q. So has 1640 motor -- strike
17 that.

18 Has 1640 Montauk LLC made any
19 revenue this last 2024, this past year?

20 A. As I said to you, unless it did
21 early in the year with collective rent, the
22 answer is no. Now, there are some rents
23 that it would have collected for the
24 apartment. It was small dollars. It was a
25 few thousand dollars a month as I mentioned

Page 93

1 J. SIMPSON

2 in one of the documents, right, and those
3 funds were used to pay for other expenses
4 like electric. So, unfortunately, the
5 electric bill to me is a higher priority
6 than it paying rent that would net
7 effectively go up to JJ Arch.

8 Q. Okay.

9 A. So for \$2,000 bills a month
10 bills electric or at least \$2,000 a month
11 at that property, and it is segregated
12 accounts by the way if someone wants to
13 look. Has separate accounts for the auto
14 shop versus -- it's all separate and none
15 of it is co-mingled. It's all done
16 properly.

17 Q. So 1640 Montauk LLC has not
18 earned gross revenue in 2024 --

19 A. That's not what I said. I said
20 to you the rent for the apartment, which
21 would be small, which would be maybe a few
22 thousand dollars a month, and those funds
23 from a gross perspective would be there;
24 and then on a net basis would be utilized
25 to pay for the expense of the property. If

Page 94

1 J. SIMPSON

2 it's insurance or if it's electric --

3 Q. How much would those rents be
4 that you're referring to, those small rents
5 that it may have --

6 A. I already told you. I'll tell
7 you again. The apartment's rent we got in
8 the maximum at some point was \$3,500,
9 3-5-0-0. And, unfortunately, because it
10 was at least three separate people, one of
11 them stopped paying and disappeared from
12 paying rent because unfortunately that
13 individual had -- we leased it to a person
14 who works at the property; and he had an
15 issue with his daughter unfortunately in
16 New Jersey where she got attacked in an
17 ugly way and the police mandated that he
18 had to be at home with his child, so he
19 couldn't pay the rent.

20 He was staying in this
21 apartment five nights a week and going home
22 to his family on the weekends and when his
23 daughter -- I'm not going to use the
24 word -- let's just say she was attacked by
25 a man in a very uncomfortable way. I don't

Page 95

1 J. SIMPSON
2 know the details. I never asked, but he
3 said to me I can't pay the rent here
4 because I have to go home every day and the
5 police -- I didn't verify this; but I know
6 he does go to Jersey every day. It's a
7 very long drive, a hundred miles. The
8 police told him he has to be home with his
9 family because his daughter got attacked.
10 Or they told him -- the language barrier is
11 tricky, but I didn't ask him to fulfil his
12 obligation so 3,500, whatever it was, round
13 numbers 3,000, 3,500 whatever portion it
14 was --

15 Q. Per month?

16 A. Per month. Whatever portion
17 his was was approximately a thousand to
18 1200, I don't know off the top of my head.
19 He stopped paying in early 2024 because of
20 this family incident, and it was hard to
21 lease the separate room -- because he had
22 the smallest room in the apartment even
23 though I tried -- to a third person, right.
24 So people either want a family or I've been
25 trying to lease it again to bring in

Page 96

1 J. SIMPSON

2 revenue.

3 Q. So it's one apartment --

4 A. Only one apartment.

5 Q. -- at 1640 Montauk property?

6 A. That's it, yes.

7 Q. But there's three rooms?

8 A. Yes.

9 Q. And so you were leasing out all
10 three rooms in early 2024?

11 A. I had at one point three people
12 that all agreed to live with each other,
13 but it all had separate leases for that
14 apartment.

15 Q. And the total rent was 30 --
16 approximately 3500?

17 A. Between 3,000 and 3,500. I
18 don't know the exact number in my head.

19 Q. Okay. And then this one
20 individual could no longer pay that rent?

21 A. Correct.

22 Q. And so now after that
23 individual could no longer pay the rent,
24 what was 1640 Montauk making from these
25 rent payments?

Page 97

1 J. SIMPSON

2 A. So the two remaining
3 individuals leases expired recently. One
4 of them, I believe, was December; and one
5 of them was January, which is the hardest
6 month in the Hamptons to lease anything.
7 And I've put up ads under Facebook
8 Marketplace, which is the best place I've
9 found to find a potential person to live
10 there. I've had several offers for rent
11 candidly with where the landlord/tenant
12 laws are in New York, I'm very cautious of
13 who I would bring in because as Mr. Chassen
14 can attest, the person that was in there
15 when we bought the property was -- what's
16 the legal term when somebody stays in an
17 apartment and doesn't pay, but let's just
18 say they wouldn't leave and they didn't pay
19 and they basically extorted us, which is
20 not so uncommon in landlord/tenant work in
21 New York.

22 So I've been trying to find a
23 qualified tenant. I've had several offers,
24 a qualified tenant that I believe could
25 support the rent with verifiable income and

Page 98

1 J. SIMPSON

2 proper Social Security numbers and
3 everything else; and I've got offers from
4 people that I believe are not fulfilling
5 those obligations. And I don't want to
6 occupy it for small money for the risks
7 that come with it.

8 Q. How is this rent paid to you?

9 A. So there's a variety of
10 sources, these individuals paid it
11 different ways. So, for example, Luis who
12 works for us there who was not there that
13 many months, he paid us in cash. It was
14 like, again, about a thousand dollars; and
15 those moneys were reported. And they were
16 used at, you know, for the various expenses
17 of the property and we reconcile that, that
18 money was there for, you know, it was rent.
19 It was rent collected and due.

20 The other two occasionally
21 would pay by Zelle; and if they paid by
22 Zelle, I could not do that corporately
23 through Citizens Bank. So I believe it did
24 come to one of my accounts personally and
25 then we reconciled it back into place at

Page 99

1 J. SIMPSON

2 Motors.

3 Q. And where would that personal
4 account be?

5 A. I think it was YJ Simco. I'm
6 pretty sure. If we look at the bank
7 statements I could show you, these amounts
8 of less than \$1200, \$1300. Like, it was
9 all sporadic. They gave checks at times,
10 but sometimes it was Zelle; and we don't
11 have Zelle through Citizens at the time.

12 Q. Since March of 2024, how much
13 gross revenue has 1640 Montauk made?

14 A. Gross would just be the rent
15 from the apartment, which I would have to
16 look at; but I would say approximately,
17 let's say, March to the end of the year so
18 let's call it ten months. Let's call it 20
19 to \$30,000.

20 Q. Okay. And since March of 2024,
21 how much has -- how much gross revenue has
22 225 HPR LLC made?

23 A. It hasn't because Chassen --
24 let's be clear -- no, no, no. No, no, no.
25 You're going to ask leading questions,

Page 100

1 J. SIMPSON

2 you're going to get leading answers.

3 Chassen held hostage until
4 March, until February. And if you want to
5 go look at the papers for \$40,000 --

6 Q. Since March of 2024 --

7 A. Yeah, 40,000 he held hostage.
8 That's why you're changing the topics. You
9 don't want to hear the stuff your client
10 does. Illegal. Stole 40 grand.

11 Q. Since March of 2024 --

12 A. Keep smiling, Thorne. You're
13 back at him. You pay for him. Keep going.

14 Q. Since March of 2024, how much
15 gross revenue has 225 HPR LLC made?

16 A. Zero.

17 Q. Okay. That's the answer.

18 A. Zero. It's for sale. It's for
19 sale. I have a contract.

20 Q. Since March of 2024, how much
21 gross revenue has JJNY 550 LLC made?

22 A. It's vacant, zero. Before
23 March it was zero.

24 Q. And since March of 2024 --

25 A. Yeah.

Page 101

1 J. SIMPSON

2 Q. -- how much gross revenue has
3 1640 Motors LLC made?

4 A. I told you an approximate
5 number per month. I don't have those
6 numbers in front of me. It's not the kind
7 of thing I'm going to have on the back of
8 my hand.

9 Q. And what's that --

10 A. I told you 50 to a hundred
11 thousand dollars a month gross, but the
12 expenses are beyond that.

13 Q. So your testimony is that the
14 expenses are higher than the revenue?

15 A. Most of the time, yes. For the
16 most part, yes. But it is not a simple
17 accounting because we oftentimes will sell
18 a car for someone else. It's not our car.
19 If someone were to give us a car that's
20 \$30,000 example and we have to give them
21 \$28,000 of it, so the gross number will
22 reflect the car that they gave us as a
23 consignment or depending on how they did it
24 if they ran it through our books, et
25 cetera. So the gross numbers can be

Page 102

1 J. SIMPSON

2 oftentimes reflect numbers that are much
3 larger than reality.

4 Q. Okay. Now, do you recall the
5 last time you filed a tax return for JJ
6 Arch LLC?

7 A. As I told you earlier, it's not
8 possible because all the things that aren't
9 done. I'm going to say it's 2021 or 2022.

10 Q. And what about the last time a
11 tax return was filed for 1640 Motors --

12 A. It could only be done in
13 conjunction just JJ Arch and all those
14 other things, so it would have been the
15 some time frame. I'm not sure if it
16 actually did a tax return yet because the
17 first year of ownership would have been
18 2022. I think we bought it 2022, so it
19 probably hasn't done a tax return yet.

20 Q. What about 1640 Montauk LLC,
21 has it done --

22 A. Same. It has not.

23 Q. And what about JJNY 550 LLC,
24 has it done tax returns yet?

25 A. It has not. It's all on John's

Page 103

1 J. SIMPSON

2 list.

3 Q. And what about 225 HPR LLC?

4 A. Ah, punch line because your
5 client wants me to change the agreement.
6 Ask your client about that one. Your
7 client wants me to change the agreement to
8 backdate it so he can get a tax saving, so
9 yeah, voila.

10 Q. It's a very simple question,
11 Mr. Simpson.

12 A. No. It's not a simple
13 question. It's a question of no because
14 your client wants me to give his tax
15 advantages for 225 -- it's on the record.
16 It's okay.

17 Q. Has it filed tax returns --

18 A. No. Ask your client why.

19 Q. Has it filed --

20 A. No is your answer, but ask your
21 client why. Ask him what he tried to gauge
22 me for on that one. Ask him. Criminal he
23 is.

24 Q. Has it ever done a tax return,
25 225 HPR LLC?

Page 104

1 J. SIMPSON

2 A. I don't know. I don't know. I
3 have to look. I don't know. I believe we
4 bought it in 2022 so presumably, no.
5 Either bought it 2021 or 2022. We bought
6 that before 1640. I don't remember the
7 exact date off the top of my head. I can
8 look for you if you'd like. I can find out
9 for you the day we bought it and see.

10 Q. Did it file a tax return in
11 2023?

12 A. No. How could it if it didn't
13 do 2022?

14 MR. SCHWARTZ: Okay. Let's
15 take a short break.

16 VIDEOGRAPHER: Off the record
17 at 12:20 ending media unit number
18 one.

19 (Whereupon, a short recess was
20 taken.)

21 VIDEOGRAPHER: On the records
22 at 12:34 beginning media unit number
23 two. Please proceed.

24 Q. So, Mr. Simpson, just to go
25 back to 225 HPR LLC.

Page 105

1 J. SIMPSON

2 When did 225 HPR LLC purchase
3 the real -- a real property at 225 Head of
4 Pond Road in Water Mill?

5 A. I believe in 2022. As I said
6 to you before, I have to check the exact
7 date. I don't remember.

8 Q. And how much gross revenue did
9 225 HPR LLC make from that property in
10 2022?

11 A. Off the top of my head, I don't
12 know; but I can tell you, I can calculate
13 it more or less. Let me just do some math.
14 I'm going to give you a range. I'm going
15 to tell you the revenue is probably about
16 \$75,000 a year gross.

17 Q. What about the gross -- the
18 profit, net profit?

19 A. Mortgage is probably 30, 40,000
20 plus or minus.

21 Q. And then what about 2023, how
22 much gross revenue in 2023?

23 A. Well, let me rephrase. I'm
24 giving you an annualized number, and I
25 can't tell you an exact for the year,

Page 106

1 J. SIMPSON
2 meaning I don't know which month it started
3 and stopped. So if I'm telling you that
4 \$75,000 would be a gross revenue number, it
5 was consistent -- let's assume we -- from
6 the time we bought it to the time we
7 actually put it into service if I recall,
8 I'm going back to memory lane, I believe in
9 2022 it wasn't until I would call October
10 November, I have to check.

11 So it's prime revenue was
12 really only for about a year, and it was
13 all Airbnb; and beyond my knowledge and
14 I've come to learn more recently that
15 Mr. Chassen was something is not even
16 something we're allowed to do. But here
17 nor there, it was Airbnb and it was in
18 conjunction with an individual that
19 Mr. Chassen with at his own home to do
20 Airbnb. And the Airbnb I asked to stop it
21 around -- no, I asked to stop it
22 probably -- you're on the emails,
23 August 2023 I asked to stop it.

24 Q. But that's not my question --

25 A. No, no. Your question is --

Page 107

1 J. SIMPSON

2 MR. LORENCE: Stop, stop.

3 Q. How much revenue did 225 HPR
4 LLC earn in 2023? That's my question.

5 A. I don't know. How would I know
6 off the top of my head? I don't have
7 financials in front of me. I'm giving you
8 an annualized number when it was occupied
9 via Airbnb, which I did not operate.
10 Chassen did, okay, and it was my
11 understanding of what was done versus what
12 it's not. Apparently what was done is not
13 proper, okay.

14 But during the time of the peak
15 of using Airbnb and this is before the
16 expenses from what I recall of, there was
17 an individual that Chassen had an agreement
18 with. I don't remember the exact numbers.
19 Chris Catanni, C-A-T-A-N-N-I, I believe
20 that guy was taking 10, 15 percent. I
21 don't know exact numbers; but I would say
22 the gross revenue annualized, not -- I
23 can't tell you which month it started and
24 stopped because I don't remember. It was
25 approximately I'm going to say 75,000 and

Page 108

1 J. SIMPSON

2 the reason I'm using that number is the
3 summer months because it's Hamptons would
4 produce much more money. So summer months
5 we would receive let's call it anywhere
6 between 15 and \$25,000 a month. The
7 majority of it would be there. The off
8 season months could be as little as 2,000
9 or 7,000 or 8,000.

10 So the summer is where the
11 majority of the money lives in that type of
12 world if it's Airbnb or you lease by the
13 month. Obviously, since the dispute
14 started, not to do with the bankruptcy,
15 since the dispute started in August
16 everything changed in the relationship with
17 Chassen and I and he continued to do
18 Airbnb; so he would know better than I
19 would, right, until such point in time
20 finally by February of 2024 he finally
21 after multiple Court orders decided to
22 actually give me the keys to the property
23 and trade for money -- trade for a car or
24 money in exchange like a hostage maneuver.

25 And then from there, I opted to

Page 109

1 J. SIMPSON
2 stop doing Airbnb, so there's been no
3 revenue; but in exchange if you want to
4 talk about potential gross, I have a buyer
5 right now for the market number and
6 that's --

7 Q. That's not my question.

8 A. That's the right answer to the
9 question. You're asking a stupid question.

10 Q. Mr. Simpson, my question is, --

11 A. It was vacant. It makes no
12 money.

13 Q. -- how much revenue in 2023?

14 A. It would be vacant. 2023 it
15 had money until August or September. I
16 don't remember the exact month where
17 Chassen refused to give it back, but he was
18 holding money hostage in a segregated
19 account. So you should ask him because I
20 don't know. He kept it on his own from
21 August to whatever, 2023.

22 Q. How much revenue did it learn
23 in 2024, Head of Pond property in Water
24 Mill?

25 A. I would say the exact number

Page 110

1 J. SIMPSON
2 would be up until from January -- beginning
3 of the year until February until Chassen
4 finally gave up the property and I asked
5 for Airbnb to stop, which is the worst time
6 of year.

7 Q. So since February it has earned
8 zero in revenue?

9 A. That's correct. Let's be
10 clear -- no, no, no. He stole the "for
11 sale" sign. He said they're brokers. No,
12 no. This is angled and disgusting so stop
13 it, stop it.

14 Q. Mr. Simpson, --

15 A. You can ask questions that are
16 improper.

17 Q. -- I'm asking you the
18 questions.

19 A. Yes. And I'm telling you the
20 answers. The answer is complicated.
21 Schwartz, the answer is complicated. It
22 was vacant because your guy stole the sign.
23 I called the police. Check the police
24 records.

25 MR. LORENC: Jeff --

Page 111

1 J. SIMPSON

2 Q. The question is very straight
3 forward.

4 A. And he threatened the broker.

5 Zero because he stole the sign and he
6 threatened the broker.

7 Q. So --

8 A. So depose the broker and ask
9 him about the threats that Chassen made.
10 Call him. Find out.

11 Q. So the answer to the question,
12 Mr. Simpson, is that it had zero revenue
13 since 2024 --

14 A. Right. Because your guy has
15 been illegally stopping it from bringing
16 revenue in because he can't get his way.
17 He's a child. That's exactly why. Nothing
18 to do with bankruptcy.

19 Q. And you stopped any rentals on
20 Airbnb?

21 A. No, no. Airbnb, yes. Dead no.
22 No Airbnb, zero with me. Not one dollar.

23 Q. What about leasing, did you
24 stop --

25 A. I tried. He threatened the

Page 112

1 J. SIMPSON

2 broker.

3 Q. When did you try to lease the
4 property?

5 A. I would say in 2024, most of
6 the year, most of the year.

7 Q. Who was the broker you tried to
8 lease?

9 A. Compass.

10 Q. Compass, you tried to lease the
11 property through --

12 A. Yes. Leased it for sale,
13 absolutely. It was leased or for sale. It
14 was both. It was both. And they
15 threatened the broker, so I lost several
16 months where the brokers decided they
17 didn't want to do it because he called and
18 threatened. He stole the "for sale" sign,
19 which he says he didn't do; but
20 coincidentally the next day he calls the
21 broker's office and threatens them after he
22 stole the "for sale" sign. I called the
23 police the day before. Yeah. You can't
24 bring revenue when your guy steals the
25 shit. Let's be real here. He's a thief.

Page 113

1 J. SIMPSON

2 Q. Mr. Simpson, this property at
3 225 had a pond --

4 A. Selling for a million five.

5 It's a great number thanks to me. Yes.

6 Q. Mr. Simpson, this property at
7 225 had a pond, is furnished --

8 A. Yes, thanks to me.

9 Q. -- rental property, correct?

10 A. Thanks to me. Absolutely.

11 MR. LORENC: Stop.

12 A. What's your point? Yes?

13 Furnished, yes. What else?

14 Q. And it had been previously been
15 rented on Airbnb?

16 A. Illegally.

17 Q. It had previously been --

18 A. Not by.

19 Q. Mr. Simpson --

20 A. Yes, through Chassen's account.
21 Yes, through Chassen's account.

22 Q. Mr. Simpson, yes or no, it had
23 been previously --

24 A. Yes, through Chassen's account.

25 Q. Let me ask my question.

Page 114

1 J. SIMPSON

2 MR. LORENC: You have to let
3 him pose a question even though it's
4 already been partially answered.

5 A. Four times.

6 Q. It has previously been rented
7 through Airbnb to Airbnb tenants, yes or
8 no?

9 A. Through Jared Chassen's account
10 personally, personally.

11 Q. And --

12 A. Personally.

13 Q. You stopped rentals in early
14 2024, yes or no?

15 A. I stopped rentals when he gave
16 the hostage of a house back after a Court
17 Order in February of 2024. Took a Court
18 Order for him to give the keys back to the
19 property.

20 Q. But you stopped the rentals in
21 early 2024, yes or no?

22 A. No.

23 MR. LORENC: Objection. Asked
24 and answered.

25 A. After I got the keys back to

Page 115

1 J. SIMPSON

2 the back and stopped the rentals, I hired a
3 broker to do it.

4 Q. You stopped the Airbnb rentals
5 in 2024?

6 A. Yes. I couldn't.

7 Q. It's a yes or no question.

8 A. No, it's not. It was under his
9 personal account.

10 Q. You stopped --

11 A. It was your criminal personal
12 account's client. Yes. You got your
13 answer. That's the answer I'm giving you.
14 Court give it to you. Don't give me
15 leading questions. Don't you do that.

16 Q. You can give me your answer.

17 A. Don't give me leading
18 questions. Yes. You're scum. Yeah, scum
19 lying garbage you are. Keep going. Keep
20 going. You lied to the Court literally.
21 You lied to Court two nights ago. Keep
22 lying. Keep going.

23 Q. Those types of --

24 A. I can't believe the bar gives
25 you a license.

Page 116

1 J. SIMPSON

2 MR. LORENCE: All right. Stop.

3 We're taking five.

4 A. This is exactly what I told the
5 Court would happen is this man --

6 Q. Mr. Simpson --

7 MR. LORENCE: Jeff, stop
8 talking. We need five minutes.

9 There's no question posed.

10 VIDEOGRAPHER: Do you agree
11 counsel? Going off the record.

12 MR. LORENCE: We need five
13 minutes.

14 A. You do what you want to do.
15 You run to the Judge. You go for it. Scum
16 of the earth.

17 VIDEOGRAPHER: Off the record
18 at 12:43.

19 (Whereupon, a short recess was
20 taken.)

21 VIDEOGRAPHER: On the record at
22 12:45. Please read.

23 MR. LORENCE: Counsel for
24 Simpson and Mr. Simpson took an
25 approximate two-minute break so that

Page 117

1 J. SIMPSON

2 Mr. Simpson could collect his
3 thoughts and emotions as this is a
4 trying time for him. Nothing of
5 substance was relating to the
6 questions that were posed by
7 Mr. Schwartz were discussed during
8 that break.

9 MR. SCHWARTZ: We're back on
10 the record?

11 VIDEOGRAPHER: Yeah.

12 Q. Mr. Simpson, I had asked you a
13 question, and I'm going to pose it -- let
14 me pose the full question and just, it's a
15 yes or no question. And I just want to yes
16 or no answer to it.

17 You stopped the Airbnb rentals
18 at the Head of Pond property in early 2024,
19 yes or no?

20 A. Yes.

21 Q. Okay. And, Mr. Simpson, you
22 stopped it even during the summer of 2024,
23 correct?

24 A. I didn't have access to it.
25 It's not possible. I'm not going to answer

Page 118

1 J. SIMPSON

2 a question for you that I didn't have
3 access to it. It was not possible. It was
4 on Chassen's personal account. It doesn't
5 work like that. It's just not possible.

6 So during that summer I had
7 signs and I had it for lease; and, again,
8 all the interruptions caused it to be not
9 rentable even though it should have been
10 rented because it hurt me as much as
11 anybody else to not rent it.

12 Q. So you can't use Airbnb?

13 A. His account I could not. Ask
14 him.

15 Q. But you can't use your own
16 account?

17 A. You have to start a new account
18 and as he'll tell you, it's in emails, when
19 you start a new account you have to, like,
20 season it for a month or two or three
21 before it actually gets any revenue. And
22 by the way, I was uncomfortable with it
23 because it didn't feel it was compliant
24 anyway.

25 So I've been in pursuit of

Page 119

1 J. SIMPSON
2 selling it, which is a lot more revenue,
3 which I have a buyer for now. I've had two
4 different brokers. One was scared away. I
5 have another Compass broker. As you know,
6 there's a contract going out for 1.45
7 million, which is the market price today of
8 that house; and that resolves anything else
9 that could have been collected in 20 or
10 \$30,000 of rent.

11 Q. Did you try to rent it on your
12 own Airbnb account at any --

13 A. No. I don't believe in it.

14 Q. You don't believe in it?

15 A. No, I don't.

16 Q. Okay.

17 A. I don't believe it.

18 Q. When was the last time --

19 A. By the way, just to be clear,
20 it is my decision as managing member to
21 decide if I want to do Airbnb or if I want
22 to lease it in traditional ways.

23 Q. And, Mr. Simpson, when was the
24 last time 225 HPR LLC paid its medical
25 mortgage?

Page 120

1 J. SIMPSON

2 A. That I don't know because I
3 don't have access. I don't even have a
4 letter or a notice or anything.

5 Q. Has it paid its mortgage in
6 2024?

7 A. I don't know. I don't know.

8 Q. Is it in default on its
9 mortgages?

10 A. I don't know. I don't have any
11 notices, nothing, zero. I call. They
12 don't give me information. JP Morgan does
13 not give me any information.

14 Q. You can't recall when the last
15 time you made a 225 HPR --

16 A. Again, your client has held it
17 hostage and paid the bills. You can shake
18 your head. I don't have the information.
19 I don't have it. I asked him for it.
20 You're on the emails. I said give me all
21 the expense information; and he said no,
22 I'm not doing it. So I do not have the
23 information to tell you that.

24 Q. So you cannot recall when the
25 last time was that 225 HPR LLC made a

Page 121

1 J. SIMPSON

2 payment on its mortgage?

3 A. I don't know. I don't have
4 that information. I don't know. As your
5 client said, he had a segregated account
6 and he was doing business on his own. He
7 said that to the Court in February 2024.
8 So I can't tell you with the segregated
9 account what he did or didn't do.

10 Q. And you received no notice of
11 default?

12 A. No.

13 Q. -- with respect to the 225 HPR
14 LLC --

15 A. I don't have any notices of
16 default. I do not have that and I've
17 called them --

18 Q. Do you recall making a mortgage
19 payment on the 225 HPR LLC mortgage in
20 2024; do you recall you making a mortgage
21 payment?

22 A. I do not, no, because I've been
23 trying to reach them and they don't take
24 phone calls because of the JP Morgan mess.

25 Q. Fair to say you personally have

Page 122

1 J. SIMPSON

2 not made --

3 A. I have not because I cannot
4 connect with them. I don't have
5 statements.

6 Q. Let me finish my questions.

7 A. Yeah, sure.

8 Q. You have not yourself made a
9 mortgage payment to -- for the 225 HPR LLC
10 mortgage loan in 2024?

11 A. I don't believe so. I don't
12 believe so.

13 Q. You don't believe so; or the
14 answer is no, you haven't?

15 A. It's possible that Chassen
16 did --

17 Q. I didn't ask about Chassen, I
18 asked about you.

19 A. Me personally on my personal
20 bank accounts, no.

21 Q. Not about your personal bank
22 accounts.

23 Did you cause a payment to be
24 made on behalf of 225 HPR LLC towards its
25 mortgage in 2024?

Page 123

1 J. SIMPSON

2 A. No. I called the bank and
3 asked for statements. They don't give them
4 to me.

5 Q. So the answer is no, you
6 didn't, correct?

7 A. Because I know how to -- no it
8 is relevant. It's very relevant. They
9 don't give me access, so I don't know.
10 I've called JP Morgan countless times.
11 There's emails to prove it.

12 Q. So, again, you have not
13 yourself caused --

14 A. No, because I don't have a way
15 to do it.

16 Q. -- a payment to be made to the
17 225 HPR LLC mortgage in 2024?

18 A. I don't have a way to do it.
19 JP Morgan has blocked most of us from it.
20 Jared has issues too with JP Morgan.

21 Q. And if JP Morgan did give you a
22 way to do it, how would you do it?

23 A. It would be hard right now.
24 Thank you to my lack of income. Thank you
25 to everyone who said bad shit about me in

Page 124

1 J. SIMPSON
2 this room. Yeah, it would be very hard.
3 It would very, very hard. Right. Thank
4 you to you all for your allegations because
5 I made a lot of money until you all messed
6 with me improperly.

7 So in normal course, again,
8 back to usual is that these properties were
9 not supposed to make money. They were
10 supposed to be for tax purposes. That's
11 the reason we bought these properties, so
12 let's get the real story here. These
13 properties were bought when Chassen and I
14 had big promotes, the same accounting firm,
15 Lear & Pannepacker, told us you're going to
16 get killed on taxes because we made six to
17 seven times multiples on our money, so did
18 Wiener. And we made those kind of
19 multiples.

20 They said the only way you're
21 going to offset those multiples if you have
22 properties that you own in a more exclusive
23 way one on one, and Chassen wanted to join
24 me when I bought these properties, which I
25 was buying on my own without him.

Page 125

1 J. SIMPSON

2 Q. Mr. Simpson, we're getting off
3 track.

4 A. No. We're right on track.

5 You're just deviating from yourself as
6 being devious as a person, but go ahead.
7 I'm telling you the truth of where this is
8 supposed to be. They're not supposed to
9 make money. You're missing the point.
10 They're that tax shelters.

11 Q. Mr. Simpson, no one is
12 currently representing 225 HPR Head of
13 Pond --

14 A. No. I have a contract to buy
15 it. Sell it.

16 Q. I didn't ask you about a
17 contract to buy it. No one --

18 A. No one is renting it because
19 it's being sold.

20 Q. Okay. Has anybody occupied it
21 since the --

22 A. No.

23 Q. -- JJ Arch bankruptcy?

24 A. No. Intentionally.

25 Q. When was the last time somebody

Page 126

1 J. SIMPSON

2 has occupied 225 Head of Pond?

3 A. Earlier 2024 before Chassen was
4 holding it hostage.

5 Q. Okay. Mr. Simpson, JJNY55 LLC,
6 it owns a property, correct?

7 A. Yes.

8 Q. And that property is a
9 commercial space of 550 Metropolitan
10 Avenue --

11 A. Whine store, 400 square feet.

12 Q. Again, let me finish the
13 question and then answer the question.

14 That property is a commercial
15 space at 550 Metropolitan Avenue in
16 Brooklyn, New York, correct?

17 A. Yes. It's a whine store,
18 400 square feet.

19 Q. Okay. No one is currently
20 renting or occupying that property either,
21 correct?

22 A. It's --

23 Q. I didn't -- no one is renting
24 or occupying --

25 A. No, no, no. We're not doing

Page 127

1 J. SIMPSON
2 this. You're not doing this. It's not
3 occupied. And by the way, Chassen held it
4 hostage again; and just to be clear, I
5 tried to rent it and brokers also by
6 Chassen. You can look at the emails.
7 Chassen stopped that too. So, yes, he
8 messes with that. And you're trying to
9 stop the contract for sale, yourself,
10 Mr. Schwartz. You are.

11 Q. Mr. Simpson --

12 A. No, no, no. We're not doing
13 this with you.

14 MR. LORENC: Jeff.

15 Q. I'm asking questions.

16 A. And I'm giving you answers.

17 Q. I'm asking you very straight
18 forward --

19 A. The answer is on the record if
20 you like them or not. And I give you an
21 answer. It is being sold.

22 Q. No. You didn't even let
23 medical finish the question.

24 A. You can't tell things that are
25 occupied.

Page 128

1 J. SIMPSON

2 Q. Mr. Simpson, no one is
3 currently renting or occupying the
4 property --

5 A. Vacant.

6 Q. Let me finish the question and
7 then you can answer.

8 No one is currently Renting or
9 occupying the 550 Metropolitan Avenue,
10 Brooklyn, New York, property right now; is
11 that correct, yes or no?

12 A. Vacant, vacant. And it's not
13 occupied, and it's being sold.

14 Q. Okay.

15 A. You're trying to stop the
16 contract.

17 Q. When was the last time somebody
18 was occupying the property?

19 A. The whine store that Chassen
20 was in touch with that ended in left in
21 October November of 2023.

22 Q. And since October 2023, has
23 anybody occupied --

24 A. No. It was for rent. It was a
25 brokered hired for rent.

Page 129

1 J. SIMPSON

2 Q. And is JJNY 550 in default on
3 its mortgage?

4 A. Yes. It's paying it off.
5 Paying it off.

6 Q. How long has it been in default
7 on its mortgage?

8 A. Since mortgage was sold.

9 Q. And when was that?

10 A. I believe that we found out the
11 sale of the mortgages -- I didn't even know
12 who the owner of the mortgages were until
13 probably September or -- I would say
14 September/October of 2024. I didn't even
15 know who the lender sold it to, and I have
16 countless emails to the lender so could try
17 to make payments; but they didn't respond
18 to me.

19 Q. When did the default occur in
20 payment on the mortgage?

21 A. The only thing I know about
22 was, again, the first notice I saw, first
23 notice you saw, was late 2024.

24 Q. Late 2024?

25 A. That's the first notice -- I

Page 130

1 J. SIMPSON
2 asked the bank countless times who they
3 sold it to. I called them. They won't
4 return my phone calls. I said I need to
5 know who you sold the loan to so we can
6 make payments, and they just didn't
7 respond.

8 Q. When was the last time you
9 caused JJNY 550 to make a payment on its
10 mortgage?

11 A. It would have been in, I would
12 say, late 2023 when the wine store --
13 afterwards we probably made a payment or
14 two after that and then the bank sold the
15 loan. So the bank sold the loan sometime
16 in early 2024 irrespective of the
17 bankruptcy unrelated again to the same
18 lender that bought the loan for 1640 Motors
19 and your client just told me just like I
20 did. I tried to call the lender multiple
21 times. Doesn't answer phone calls. And
22 even their lawyer barely answers calls,
23 which we shared with you what their lawyer
24 said. And we're selling that asset, so,
25 yes. We're selling it at a good number,

Page 131

1 J. SIMPSON

2 yes.

3 Q. Does JJNY 550 have insurance on
4 the property right now?

5 A. I'm not sure. I have to look.

6 Q. Does 1640 Montauk LLC have
7 property on the insurance right now?

8 A. Yes, definitely.

9 Q. Does 1640 Motors --

10 A. Yes.

11 Q. Wait. Does 146 Motors LLC have
12 insurance on Rever Motors right now?

13 A. Yes.

14 Q. Does 225 HPR LLC have insurance
15 on Head of Pond right now?

16 A. I'm not sure because I've asked
17 Chassen for the bills. He could be paying
18 it. I wouldn't know. I don't know.

19 Q. Have you, yourself, obtained --

20 A. I don't have the information.

21 Q. Have you, yourself, obtained
22 insurance for --

23 A. How could I if he already has
24 insurance? You keep spinning it around,
25 Allen. It's not going to work. It's not

Page 132

1 J. SIMPSON
2 going to work. You're not going to
3 convince me. You're not going to go there
4 with me. I haven't gotten a new policy if
5 there's already one that's there that he
6 put in place. You're smiling because
7 you're devious. The lie in your face is so
8 obvious I don't even know you.

9 MR. LORENC: Jeff.

10 Q. Mr. Simpson, I'm asking you a
11 very straightforward question.

12 A. No. The answer is no. No.

13 Q. Have you, yourself, obtained
14 insurance --

15 A. No.

16 Q. -- obtained insurance for the
17 225 HPR LLC property in 2024 or presently?

18 A. It is my understanding that
19 Chassen had a policy in place; and if he's
20 paying it, I don't know.

21 Q. Are you paying it?

22 A. I don't have a bill to pay it.
23 I don't know.

24 Q. Have you obtained any
25 insurance?

Page 133

1 J. SIMPSON

2 A. It's my understanding he had a
3 policy. He was paying bills he didn't tell
4 me about. I asked him countless times,
5 you're on the email, saying give me a list
6 of all the expenses that you were paying
7 and he ignores me.

8 Q. So you do not know today
9 whether --

10 A. I do not know. I do not know.
11 I do not know. Ask your client.

12 Q. What about the property at 89th
13 Street at 146 East 89th Street --

14 A. Yes.

15 Q. -- does that have insurance?

16 A. Peldman and Chassen are all in
17 a group email. I sent him the email the
18 premiums of the insurance. I asked
19 everybody their views because unlike what
20 people make me out to be, I'm some bad guy,
21 I ask the partners what their views are on
22 and everybody ignores me. There's no funds
23 available in that account and Chassen says
24 he's not funding any money. Miller says
25 she's not funding any money. Peldman said

Page 134

1 J. SIMPSON

2 he wants to give more consent. I said
3 look, I'm not going to do I contractually
4 but I'll help you. I sent him a notice on
5 the insurance that said, please chime in
6 what you want to do. And that was very
7 recently.

8 So the policy that's there or
9 wasn't there, it's in the last maybe month
10 or two that would probably be -- it's
11 possible it's expired in the last two
12 months. It's not like eight months old or
13 a year old.

14 Q. So it's not currently insured?

15 A. I'm not sure. I'm not sure. I
16 sent it to Peldman. I sent the
17 information -- again where is money
18 coming from --

19 Q. That is not the question.

20 A. It is the answer. You're just
21 being devious. Go ahead. You're not -- we
22 can do this all night long. You're not
23 going to win with me. You're not going to
24 ask me devious questions.

25 Q. I'm asking you a very

Page 135

1 J. SIMPSON

2 straightforward question.

3 A. I'm going to clarify on the
4 record all the devious questions you're
5 asking.

6 Q. Does it have insurance or
7 not --

8 A. I don't know. I don't know. I
9 sent it to Peldman. Peldman's expressed
10 interest in taking control of the property.
11 I got the insurance premium. It's not a
12 lot of money. I shared it with Adam
13 Peldman. It was not that long ago. He has
14 not responded. I don't have an answer to
15 your question. I will check into it.

16 Q. But you, yourself, haven't --

17 A. I have not. I sent it to Mr.
18 Peldman who said he wants to control the
19 property. I said put it on the record. If
20 he chose to do something with it, which I
21 would allow him to do, he could have, okay.
22 And he's the majority investor in that
23 deal.

24 Q. But you're the managing member
25 though?

Page 136

1 J. SIMPSON

2 A. Well aware. And Chassen knows
3 and so do you. And he wants to take over
4 the property, and I've been trying to be a
5 Good Samaritan to him. So please stop your
6 nonsense.

7 Q. So you would be responsible for
8 getting insurance on that property?

9 A. I would be responsible if
10 there's money available.

11 Q. And if there wasn't money
12 available, you would have the means to get
13 money through capital call notices --

14 A. How, how?

15 Q. -- under the operating
16 agreements?

17 A. How? How? No, no, no. Also
18 they're not putting money in. I have
19 emails which we shared with you. Everyone
20 said we're not putting any money in,
21 period, the end. So I can keep capital
22 calling until the cows come home. Every
23 partner including Chassen said I'm not
24 putting a dollar in this. So, yeah, sure,
25 keep capital calling. They said we're not

Page 137

1 J. SIMPSON

2 putting a dollar in, so there's no way to
3 find money for it.

4 Q. So just to be clear --

5 A. Do you work for free? Do you
6 work for free? Do you get paid?

7 MR. LORENC: Stop. Stop.

8 Q. Just to be clear, you don't
9 know whether the property at 225 Head of
10 Pond Road in Water Mill is insured right
11 now?

12 A. I'm telling you that Chassen
13 had a policy that he was managing, and I
14 don't have the answer because he's not
15 answering my question. I'm telling you as
16 it relates to 146 that Peldman expressed
17 interest --

18 (Reporter clarification.)

19 A. Let me go back. Head of Pond,
20 Chassen had a policy that he was
21 coordinating and I was aware of it and when
22 he finally released the property to me in
23 February under a Court Order of 2024.
24 After that, I've asked for his records.
25 I've asked for his expenses. He refused to

Page 138

1 J. SIMPSON

2 give it.

3 I'm answering the question.

4 You're not going to like it or not or I'm
5 not continuing this. Okay? So you're not
6 going to interrupt me.

7 Q. Mr. Simpson --

8 A. No, no, no, no. The court
9 reporter asked me to repeat things, and I'm
10 going to repeat for her so you're going to
11 stop and you're going to wait right now.
12 You don't control this. You don't control.
13 Stop. Shut it.

14 Q. It's my deposition.

15 A. No. It doesn't matter. You're
16 being rude. You're being rude.

17 MR. LORENC: Jeff, stop.

18 Q. If I pose you a question, it's
19 not an invitation for you just --
20 Mr. Simpson, it's a yes or no question.

21 It is true you do not know
22 today whether or not the property at 225
23 Head of Pond has insurance right now, yes
24 or no?

25 A. No.

Page 139

1 J. SIMPSON

2 Q. Is it true to say that you do
3 not know sitting here today whether the
4 property at 146 East 89th Street in
5 Manhattan has insurance today, yes or no?

6 A. I don't know.

7 Q. Okay. And is it also true to
8 say that you don't know whether the
9 property at 550 Metropolitan Avenue in
10 Brooklyn, New York, has insurance right
11 now?

12 A. Again, I don't know given the
13 people involved.

14 Q. Okay.

15 A. You act as if I actually
16 coordinate this stuff on a day-to-day
17 basis. I'm the CEO of a company with a
18 hundred people. I didn't do any of this.

19 MR. LORENC: There's no
20 question.

21 MR. SCHWARTZ: Off the record
22 for one second.

23 VIDEOGRAPHER: Off the record
24 at 13:00.

25 (Whereupon, a short recess was

Page 140

1 J. SIMPSON

2 taken.)

3 VIDEOGRAPHER: On the record at
4 13:09. Please proceed.

5 Q. Mr. Simpson, let's talk about
6 YJ Simco for a moment.

7 What does YJ Simco LLC own?

8 A. Do I have to tell him that?

9 Q. You have to answer my question.

10 A. It has nothing to do with JJ
11 Arch.

12 MR. LORENC: You can answer
13 this particular question.

14 A. It has -- it's an LLC. It's an
15 LLC that my wife and I are the only
16 principles of and then there's various sub
17 LLCs that own properties that are
18 properties that we live in, properties that
19 we own in our family. It's not very many,
20 but there's several.

21 Q. What are those properties?

22 MR. LORENC: Objection.

23 Relevance?

24 MR. SCHWARTZ: Well --

25 MR. LORENC: We're here for

Page 141

1 J. SIMPSON

2 Motion 17.

3 MR. SCHWARTZ: Well, as we'll
4 establish in just a few moments,
5 Mr. Simpson has made transfers from
6 1640 Motors to YJ Simco --

7 MR. LORENCE: You can present
8 that evidence.

9 MR. SCHWARTZ: It's relevant.

10 A. It's made loans for small
11 amounts of money to make payroll.

12 MR. LORENCE: There's no
13 question --

14 Q. Let me ask the question.

15 What properties does YJ Simco
16 LLC own?

17 MR. LORENCE: Objection.

18 MR. SCHWARTZ: Are you
19 directing the witness not to answer?

20 MR. LORENCE: Again, relevance.
21 We're here for the scope of Motion
22 17. If you want to present the
23 witness evidence of the purported
24 transfers you're alleging, ask him
25 about it.

Page 142

1 J. SIMPSON

2 MR. SCHWARTZ: Are you
3 directing the witness not to answer,
4 yes or no?

5 MR. LORENCE: I think this is
6 outside the scope of Motion 17.

7 A. How about -- hold on a second,
8 one second.

9 MR. LORENCE: I'm --

10 A. YJ Simco does not have
11 anything --

12 MR. LORENCE: We're not -- stop.
13 Do we need to get a ruling on this?

14 MR. SCHWARTZ: You need to
15 first tell me whether you're
16 directing your client not to answer.

17 MR. LORENCE: This is outside
18 the scope of 17. Do you want to get
19 a ruling on it? That's what I'm
20 telling you.

21 MR. SCHWARTZ: Are you telling
22 your client not to answer?

23 MR. LORENCE: Based on the
24 question in the format it's asked
25 without any foundation whatsoever

Page 143

1 J. SIMPSON

2 based on what you said you had
3 allegations of illegal transfers or
4 transfers in kind, yes. If you want
5 to present him with a line of
6 questioning that demonstrates those
7 transfers, feel free to do so.

8 MR. SCHWARTZ: Okay. Let's
9 proceed. We can revisit this later.

10 Q. Mr. Simpson, what transfers
11 have you done from JJ Arch or the JJ Arch
12 controlled entities as I previously defined
13 it here today to YJ Simco LLC?

14 A. Property transfer? There
15 hasn't been any.

16 Q. What transfers of money have
17 you made from JJ Arch LLC or the entity --
18 and the entities it controls --

19 A. Right.

20 Q. -- to YJ Simco LLC?

21 A. So JJ Arch when it got -- when
22 it did its guaranteed payments, I believe
23 those funds were sent to YJ Simco during
24 the days of Arch when things were proper.
25 I'm pretty sure that's where we sent the

Page 144

1 J. SIMPSON
2 money. I don't think I sent it personally.
3 I think I sent it to YJ Simco, but I have
4 to check. Those would be dollars that
5 would have been in the budget for Arch,
6 for -- I can't say five years because we
7 didn't have that entity for five years, but
8 for a few years probably I believe that JJ
9 Arch would have sent money for the
10 guaranteed payments there.

11 As far as the JJ investment
12 entities, there is a document that Chassen
13 and I did two years ago which reports to
14 move our respective interests from
15 personally ownerships of our investments,
16 mine to YJ Simco and his to 55 Manor Pond
17 LLC. I don't have enough depth to tell you
18 if that is a transfer ever was done other
19 than I know there's a document that exists
20 that says it for both of us. I just don't
21 know -- there's no transactions that
22 related to that that have caused anything
23 to -- other than a piece of paper that we
24 signed, there hasn't been anything that's
25 occurred that's related to it.

Page 145

1 J. SIMPSON

2 But there hasn't been no
3 transfers for me on the JJ investment
4 entities unrelated to these four properties
5 at all other than those transfers that are
6 not born by me that are born by Oak's
7 transactions, which I don't even know. So
8 there's definitely transactions that
9 occurred that I can't control, like, for
10 example, they sold Melrose. There's a JJ
11 Melrose entity. What it did or didn't do,
12 I can't tell you because I just don't know.

13 But as far as these properties,
14 these four properties you're describing,
15 right, the -- any distribution moneys that
16 would have been available from those
17 properties would have been profit. There
18 wasn't profit at these properties, so JJ
19 Arch wouldn't get that money, right. YJ
20 hasn't given those loans not to JJ Arch,
21 but to JJ investment entities. For
22 example, if it had to pay, we put up a
23 \$25,000 loan or 2 -- yeah, 25,000 loan for
24 89th Street for the bank loan --

25 Q. Mr. Simpson, my question was

Page 146

1 J. SIMPSON

2 what transfers of money --

3 A. Yeah.

4 Q. -- have you done --

5 A. I don't know.

6 Q. -- from JJ Arch LLC or the
7 entities it controls --

8 A. Yeah.

9 Q. -- to YJ Simco?

10 A. I can't answer that kind of
11 question here. It's an accounting
12 question. I would have to look for over
13 the years. I don't know.

14 Q. So let's narrow it then.

15 What transfers have you done
16 from JJ Arch LLC or the entities it
17 controls to YJ Simco in 2024 in just that
18 year?

19 A. I would say the only thing that
20 comes to mind would be moneys ins and outs,
21 meaning YJ Simco would have lent 1640
22 Motors 5,000, 10,000, 15,000 dollars
23 because I couldn't make payment for the
24 week and we returned it back to ourselves.
25 That would be the only thing I think of

Page 147

1 J. SIMPSON

2 that it would have been, and I only believe
3 that YJ Simco funded on behalf of 89th
4 Street because, again, these bank accounts
5 are all a mess.

6 It funded for the loan, I
7 believe the loan was in 2024. I think it
8 was early 2024, either late '23 or early
9 '24. \$25,000 deposit for a new loan at
10 89th street that not because of me blew up,
11 and I believe we got back whatever the net
12 was. So YJ sent 25,000 out to this lender;
13 and it got back say 15,000 I think was the
14 net. I think the lender used 10,000 of its
15 expense deposit.

16 And then I'm going to answer a
17 question for you which was the same thing.
18 You asked about legal expenses; and what
19 I'm going to tell you is that what we did
20 with legal expenses, JJ didn't have money
21 to pay legal expenses so YJ or my
22 investment account would fund money for
23 legal that was sent to JJ and then JJ may
24 have paid lawyers. I don't know if it was
25 '24 or '23, but it was always my money

Page 148

1 J. SIMPSON

2 first, not that I wasn't allowed to.

3 Regardless of what you think I'm allowed to
4 do, which I'm allowed to do, but even to
5 follow what -- the moneys would have been
6 sent from YJ to JJ and JJ outbound to law
7 firms.

8 So if you look at bank
9 statements you're going to see 50,000,
10 100,000 dollars for legal bills that were
11 paid. Again, it flowed through -- the only
12 account that I had is a business account
13 that made sense which was YJ, but it wasn't
14 a distribution where we took money for our
15 pocket.

16 Q. Other than money coming out of
17 22 -- strike that.

18 Other than money coming out of
19 1640 Motors LLC, the YJ Simco, did any
20 other JJ Arch entity transfer any money to
21 YJ Simco?

22 A. I believe that in Jared's
23 extortion attempt for the Porsche that was
24 not in his name that he released the
25 \$40,000, I believe, that that \$40,000 went

Page 149

1 J. SIMPSON
2 from whatever segregated account he so
3 called had it in to YJ Simco and would use
4 it to pay bills, yes. Because we are
5 upside down -- the YJ entity is probably
6 given. I'm working on a tally. I don't
7 know the exact number. Probably given
8 between two and \$300,000 of loans to cover
9 shortfalls in payroll and interest over the
10 last 18 months at 1640 Motors.

11 Q. So that 40,000 you just
12 referenced --

13 A. Yes.

14 Q. -- it was transferred -- you're
15 saying it was --

16 A. Chassen transferred it.

17 Q. You're saying that Chassen
18 transferred it from the segregated account
19 to -- directly to YJ Simco?

20 A. I believe so. I believe that's
21 where he sent it.

22 Q. And it didn't go first to 225
23 HPR LLC and then to YJ Simco?

24 A. It may have. I don't know. I
25 have to look. I'm not sure. Again, we've

Page 150

1 J. SIMPSON
2 had a hard time accessing these bank
3 accounts for a long time now with JP
4 Morgan, so we've skipped what I used to do
5 for years was everything in a separate bank
6 account was very simple.

7 Q. But it definitely went to YJ
8 Simco?

9 A. Absolutely. As a net result of
10 all the money I've lent the companies,
11 absolutely.

12 Q. And --

13 A. I get to eat too don't I to
14 return the money I loan to the company?

15 Q. How was that money used?

16 A. I can't tell you I know off the
17 top of my head; but I can tell you this,
18 we've lent money every month more or less
19 to the various entities, mostly 1640.

20 Q. Was that money used for JJ Arch
21 or its controlled entity, that 40,000?

22 A. Probably for payroll expense,
23 for 1640 Motors. I have to check.

24 Q. Did you transfer that money
25 from YJ Simco to 1640 Motors?

Page 151

1 J. SIMPSON

2 A. Not that day, no.

3 Q. Did you ever transfer that for
4 those funds to 1640 Motors?

5 A. We definitely transferred money
6 to 1640 Motors in excess of \$40,000. I
7 can't tell you the exact day or time but
8 definitely way more than that.

9 Q. How much money has 1640 Motors
10 paid to YJ Simco?

11 A. I don't think it's a lot. I
12 would have to look.

13 Q. More than \$40,000?

14 A. I don't know. I would have to
15 look; but, again, again, so, again, I'm
16 going to be practical here, and I don't
17 care what your question is. If there's
18 payroll owed that's required --

19 (Reporter clarification.)

20 A. Her client, Oak, who doesn't
21 understand payroll who insisted I should
22 keep hundreds of workers on staff, and not
23 pay them, I don't break those laws. So if
24 1640 Motors needs payroll, which it's due
25 at the end of week of \$15,000 and there

Page 152

1 J. SIMPSON
2 isn't money available, where is it coming
3 from? It can't just go nowhere. It's a
4 federal law to pay the staff. Otherwise,
5 they don't come back. So the only way to
6 fund it from is personal or through a
7 business that I control. So YJ Simco would
8 fund if it was 5,000, 10,000, it's happened
9 quite a few times where we could not make
10 payroll, and I couldn't let people not make
11 payroll or insurance expense and we would
12 fund it. And we would then return it back
13 to ourselves with no interest without any
14 premium just to cover costs.

15 So those transactions if I had
16 to articulate them and had to work on it,
17 it is something I'm already developing.
18 It's in process. If somebody wants to see
19 it, I have nothing to hide. It's not
20 something I got in my pocket out of it. It
21 was exchanging money to cover shortfalls
22 and short-term loans, which is done all the
23 time in businesses.

24 Q. Okay. We would reiterate our
25 demand that all banking records of the JJ

Page 153

1 J. SIMPSON

2 Arch and JJ Arch controlled entities at
3 Citizens Bank and at JP Morgan Chase bank
4 be produced to us forthwith.

5 A. Well, Robert has a view on that
6 he'll share with you because it's tied to
7 the commentary and your list of requests.

8 MR. LORENCE: Noted. Noted.

9 Q. Okay. So the 1640 Montauk
10 property, it houses a business called Rever
11 Motors, correct?

12 A. The technical name is 1640
13 Motors LLC d/b/a Rever Motors.

14 Q. And who owns that business?

15 A. It appears to be JJ Arch LLC.
16 Doesn't seem to be an operating agreement
17 that I could find or Chassen could find, so
18 we don't have an operating agreement that I
19 could find.

20 Q. But it's been operated through
21 JJ Arch LLC?

22 A. It's been operated through JJ
23 Arch LLC during -- up until 2023, you know,
24 when Jared actually participated funding
25 money and actually participated in doing

Page 154

1 J. SIMPSON
2 things to be helpful and constructive.
3 After the fall out of August of 2023, he's
4 had no involvement. So I can't say that
5 definitively, no. I can't. He hasn't had
6 any involvement. He hasn't offered to do
7 anything other than cause trouble; so, you
8 know --

9 Q. That's about Jared. I'm
10 talking about JJ Arch LLC.

11 A. I understand that, but there is
12 no contractual obligation that I can find
13 that JJ Arch has to 1640 Motors directly,
14 and that's something that is a question
15 mark for all of us or all of us that care.
16 It shouldn't be all of us. It should be me
17 and Robert and you and Chassen, but it
18 appears to me that -- anyway. There's a
19 lease. How about that? We know there's a
20 lease between 1640 Motors LLC and 1640
21 Montauk LLC.

22 Q. So --

23 A. 1640 Montauk LLC is the
24 landlord.

25 Q. When did JJ Arch buy the

Page 155

1 J. SIMPSON

2 property -- the property at 1640 Montauk?

3 A. Again, sometime in 2022. I
4 don't know the exact date.

5 Q. And what about the business,
6 Rever Motors?

7 A. He didn't buy the business. It
8 was created. LLC was created around the
9 same time.

10 Q. So it was created around the
11 same time that JJ Arch bought the property?

12 A. Mm-hmm.

13 Q. Okay.

14 A. Within a month or two.

15 Q. And Jared also invested in it,
16 correct?

17 A. Yeah.

18 Q. Okay. And how many cars has
19 Rever Motors sold in the last year?

20 A. I don't have the tally in front
21 of me; but I would say 40, 50, 30, I don't
22 know, somewhere in that range. I would
23 have look at it and see. Some of which are
24 confinements. Some of which are what I
25 call hybrids. Some of which are property

Page 156

1 J. SIMPSON

2 that were owned by Rever, and there's some
3 that were my personal cars that I did
4 process through Rever because I felt it was
5 my duty to do it through a dealership; and
6 I papered that through proper bills of
7 sales for cost.

8 Q. And how many cars did it sell
9 approximately the year before?

10 A. I don't know. In 2023? A lot
11 less. It did a lot more in 24 than 23. A
12 lot less in 24 -- it's -- business is doing
13 well. It isn't make money yet, but it's
14 improving every month.

15 Q. Did you seek Jared's consent
16 before you made each of these 40 or 50 --

17 A. Absolutely not. Not required
18 whatsoever.

19 Q. Let me ask the question.

20 A. No.

21 Q. Did you seek Jared's consent --

22 A. No. Doesn't have consent for
23 it.

24 Q. Did you seek Jared's consent
25 before you sold these vehicles?

Page 157

1 J. SIMPSON

2 A. Absolutely not. Doesn't
3 deserve it. Doesn't have anywhere does it
4 say that. No document says it. It's not
5 even considered an investment as it relates
6 to the definition.

7 Q. You would agree that a car is
8 property?

9 A. I don't know that it's
10 property, no. I'm not sure that I agree
11 with those terms. No.

12 Q. As a matter of definition,
13 you --

14 A. I'm not sure of that, no. I'm
15 not sure. By the way, lots of times cars
16 weren't even owned by 1640 -- no,
17 definitely not. The intention of JJ Arch,
18 read the document, is for real estate
19 investments. The fact that I wanted to do
20 something on my own, which I'm allowed to
21 do with the documents, it doesn't have any
22 preclusions for it. This was my idea.
23 Chassen wanted to ride my coat tails. I
24 asked him stay far away. And if you want
25 to Subpoena the guy who we sold -- who we

Page 158

1 J. SIMPSON
2 bought it from, he'll tell you. Chassen
3 didn't want nothing to do with this, and he
4 should have stayed far away. I said don't
5 get involved with me with this. And he was
6 my friend for 12 years like a little
7 brother. Shouldn't have gotten near it.
8 All of those assets are -- other than 550
9 which I didn't want were all my purchases
10 that he asked to join, right. I should
11 have said no.

12 Q. But he invested in Rever Motors
13 also?

14 A. He invested in all of them some
15 amount of money which he recognized and
16 told me how much he invested in June 2024.

17 Q. And you didn't seek his consent
18 before you sold these vehicles?

19 A. I didn't seek his consent of
20 anything ever. He never asked for consent.
21 It was never a thing. He sat next to me
22 all day, and he knew what was happening.
23 He would transfer moneys here and there;
24 and as the Judge said to you as you
25 probably heard him, that if there were

Page 159

1 J. SIMPSON

2 things that were done in a certain way --

3 (Reporter clarification.)

4 A. If a Judge said if Simpson woke
5 up one morning and decided that rights to
6 give to Chassen he doesn't want to give it
7 to him anymore, he doesn't have to give it
8 to him. So, no, buying and sells cars was
9 not something -- how could I possibly
10 operate a car business by getting consent
11 from someone that doesn't even want to rent
12 a house that makes money. No chance in
13 this world. You're out of your mind.

14 Q. Was there an auto shop there
15 before Rever Motors --

16 A. Yes.

17 Q. What was the name of that auto
18 shop?

19 A. There's a few names. One of
20 them was called Sunset Motors. There's
21 another one called Rit-Lyn Motors.

22 Q. There were two different stores
23 at that location?

24 A. Well, it was two
25 brother-in-laws. It was originally called

Page 160

1 J. SIMPSON

2 Corrigans. There were two brother-in-laws
3 that were in a fight, in dispute, not a
4 legal dispute, but they hated each other;
5 and they operated the property like two
6 separate properties almost, not different
7 COS and one had the upstairs of it and one
8 had the downstairs of it and they never
9 spoke to each other. And the two guys that
10 owned it and we bought it, they had to
11 consent. It was a very difficult sale and
12 Rit-Lyn was one guy who passed away
13 unfortunately. Richard and the other one
14 was called Sunset, which was Steve, yup.

15 Q. And how long have auto
16 businesses been on that property?

17 A. I would venture to say at least
18 40 years or longer.

19 Q. And have they been successful
20 generally?

21 A. I don't think so. Honestly
22 looked like a junkyard for years before I
23 bought it, and I tend to buy distressed
24 assets; so we put a lot of money into it to
25 make it better. But it was probably not

Page 161

1 J. SIMPSON

2 successful with major problems when we
3 bought it.

4 Q. Did the auto shop from a prior
5 account with Hertz?

6 A. It had a very bad contract with
7 Hertz. It was terrible. Chassen wanted to
8 cancel like I did.

9 Q. How long did it have that
10 contract with Hertz?

11 A. Don't know. We made almost no
12 money. It was -- if you want to know
13 specifics, it was less than ten percent of
14 revenue; so if you rent a car for \$70, it
15 was \$7 to process a car. It made no sense.
16 And Chassen and I had many conversations
17 with Hertz about changing the game and
18 making it better and they never complied in
19 any good way, and he did more of the
20 talking with him than I did; and at some
21 point I just said this is not worth it. We
22 couldn't afford to staff it. It cost more
23 than the revenue.

24 Q. So Hertz left, right?

25 A. No. We asked them to leave.

Page 162

1 J. SIMPSON

2 We asked them to leave.

3 Q. When was that?

4 A. That happened in, I want to say
5 end of 2023, end of 2023.

6 Q. After the events of August --

7 A. Yes.

8 Q. -- 6th, 2023?

9 A. Yes. But it was already headed
10 in that direction anyway.

11 Q. So you're saying that Chassen
12 agreed with you that Hertz should leave --
13 that you should tell Hertz to leave --

14 A. Absolutely.

15 Q. -- Rever Motors?

16 A. Absolutely. He was the one
17 that spoke to them. I didn't talk to them
18 ever. He was the one that spoke to them --
19 if you want to know specifics, they were
20 dropping off -- people were coming from
21 airports, dropping of 20, 30 cars at our
22 property that we had to clean and turn
23 around for zero income. And we were
24 renting cards making three dollars, seven
25 dollars. Didn't make any sense. So what

Page 163

1 J. SIMPSON

2 Chassen did is, I thought it was a good
3 idea, him and I together told them, but he
4 spoke to them, they were only going to do
5 premium cars going forward. That premium
6 car idea, we had to make an investment for
7 electric chargers, for Teslas. We did all
8 those things; and then effectively as a
9 result of it, they're still only charging
10 \$70 a day. And we said to them for \$70 a
11 day for seven dollars, three dollars,
12 there's no way we could possibly cover the
13 cost of staffing, cleaning, and servicing.

14 So we pushed them for premium
15 cars multiple times. Chassen did alongside
16 me, and then it sort of withered out; and
17 they refused to sort of be helpful. I did
18 terminate the prior owner who was helping
19 us there who Chassen had problems with and
20 I had problems with.

21 Q. Who was that?

22 A. His name was Stephen Lobosco
23 and he was definitely syphoning money on
24 the sidelines; and when I terminated him, I
25 asked him to stay with us in the beginning.

Page 164

1 J. SIMPSON

2 We made no money under his watch at all.
3 It was a disaster. We were performing the
4 highest we ever had in the last year or
5 eight, nine months, production of my doing.
6 But Steve just would leave at four o'clock
7 and, you know, Jared -- I have text
8 messages I found over the weekend as I told
9 you preparing for this. He literally was
10 telling us you go fire him. It was very
11 messy. And Steve and Hertz had a very
12 close leadership.

13 So Steve actually on his exit
14 did some funny business with Hertz. It was
15 Hertz in Southampton. They took all the
16 customers there, and Hertz just sort of
17 stopped talking to us. There was never an
18 official cancellation. That's the truth of
19 it. If you depose people, you'll find out.
20 But Hertz was never a source of any good
21 there. It costs it. We didn't make money.

22 Q. Okay. How many employees has
23 Rever had since JJ Arch bought it?

24 A. I don't know.

25 Q. Over a hundred?

Page 165

1 J. SIMPSON

2 A. No. No way. A hundred? No
3 way.

4 Q. What was the highest total it
5 ever had?

6 A. You mean at one time?

7 Q. At one time?

8 A. Less than ten. It's never been
9 more than ten.

10 Q. How many does it have now?

11 A. I made the list with you. I
12 can do it again. I want to say it's less
13 than ten but let me just --

14 MR. LORENC: Point of clarity,
15 are you including -- do you want W2
16 employees or 1099 consultants as well
17 in this?

18 MR. SCHWARTZ: Any, all
19 employees.

20 A. W2, I mean, there's only one
21 1099 we've had in recent times. Steve
22 Lobosco, the former owner, was a 1099 when
23 he was there. We've had other 1099s at
24 times. Sometimes we had part-time people.
25 So I would say with part time, it's still

Page 166

1 J. SIMPSON

2 under ten. I think the number would be
3 eight today that would be on the payroll.

4 VIDEOGRAPHER: Mr. Simpson,
5 just move over.

6 A. Sorry about that. I would say
7 it's eight; but, no, we never had no more
8 than ten that work there at any given time.
9 There wasn't room. I don't know where you
10 get a hundred from.

11 Q. Mr. Simpson, how many people
12 have quit in the past year -- strike that.

13 How many employees have quick
14 in the past year?

15 A. I have to think about it. It's
16 not a whole lot. We haven't had that many.
17 I have to look at the list of current
18 people, so this guy's been there more than
19 a year. He's been there more than a year.
20 He's been there more than a year. I
21 believe he's been there a year. I would
22 say about half of who's there now has been
23 there about a year already to answer that
24 question; and then we've had a really hard
25 time just, like, just like we did at Arch,

Page 167

1 J. SIMPSON
2 would be someone in the office worked
3 there. So we've had several people in the
4 office where there's just one role where
5 they're just answering the phone reception,
6 et cetera, et cetera, and we've probably
7 been four or five people where they don't
8 want to do the work. The commute is very
9 hard.

10 But I would say in the
11 mechanics world, we've been very
12 consistent. I have one person that
13 recently left to go on his own, do his own
14 thing. I trained for over a year. But
15 that's -- the turnover has only been really
16 the role which, again, even at Arch we had
17 a very hard time and others told us to get
18 people to do sort of accounting and do the
19 office work is very hard today and --

20 Q. My question was, how many
21 people quit? That's all.

22 A. I don't know. You think I know
23 off the top of my head? A few people.
24 It's, like, two or three. It's not, like,
25 a hundred. Maybe it's five maximum.

Page 168

1 J. SIMPSON

2 Q. Mr. Simpson, I would like to
3 show you what is going to be marked as
4 Exhibit C3 if you can look on your screen.
5 It's -- if you look on your screen it will
6 show up as Exhibit 4, but it's been marked
7 Exhibit 3 on the document.

8 (Whereupon, Exhibit C3 banking
9 records for YJ Simco LLC were marked
10 for identification as of this date.)

11 Q. And this is a -- banking
12 records for YJ Simco LLC.

13 A. Yeah.

14 Q. Do you recognize these banks
15 records?

16 A. I have to look at them. I'm
17 not there yet. Hold on. Going to
18 disclosures. One second. (Perusing).
19 Yeah.

20 Q. What do you recognize this
21 document to be?

22 A. The bank statements from Chase,
23 JP Morgan.

24 Q. And this is for YJ Simco,
25 right?

Page 169

1 J. SIMPSON

2 A. Yes.

3 Q. And if I could turn your
4 attention to -- if you see on the bottom
5 there's these numbers where it says Chase
6 Simpson, and then it gives a bunch of
7 numbers. Do you see that?

8 A. When you say bottom --

9 Q. Bottom right-hand corner.

10 A. Which page?

11 Q. Just generally, if you look on
12 the page it says Chase_Simpson and then
13 there's a bunch of numbers.

14 A. Yes.

15 Q. If I can take your attention to
16 the one that says Chase_Simpson and ends
17 with 136?

18 A. Mm-hmm.

19 Q. If you see there it says
20 deposits and additions, do you see that?

21 A. Hold on. Yeah.

22 Q. And it seems to say -- there's
23 a date July 19th and it says fed, wire
24 credit via Citizens Bank, 1640 Motors LLC,
25 \$20,000?

Page 170

1 J. SIMPSON

2 A. Yes.

3 Q. Do you see that?

4 A. Yes.

5 Q. Did you make that transfer from
6 1640 Motors LLC to YJ Simco, yes or no?

7 A. Yes. As I told you we paid
8 ourselves member loans.

9 Q. And was that -- did that
10 transfer occur while JJ Arch was in
11 bankruptcy, yes or no?

12 A. Yes.

13 Q. And did you report this
14 transfer to the United States Bankruptcy
15 Court, yes or no?

16 A. I was told from my attorneys
17 that if there were loans that were being
18 repaid, it was not necessary. So that's
19 the answer.

20 Q. No. The question is very
21 simple.

22 Did you report it to --

23 A. I don't know. I don't have
24 that report in front of me.

25 Q. Did you report this to the

Page 171

1 J. SIMPSON

2 bankruptcy --

3 A. I don't know.

4 Q. Let me ask the question.

5 A. I heard your question. Did I
6 report to bankruptcy Court? I don't know.
7 I've already heard it three times.

8 Q. Did you report this transfer to
9 the United States Bankruptcy Court, yes or
10 no?

11 A. I don't know. I would have
12 look into it; but if you're asking me what
13 it is, I'll tell you what it is. If you
14 care to know what it really is, the real
15 question.

16 MR. LORENC: There's no
17 question.

18 Q. Let's turn your attention to
19 the document, the page number ending in
20 144. If you can turn your attention there.
21 You see it says on 8/12, there's a -- it
22 says Fed credit wire via Citizens Bank,
23 1640 Motors LLC, in an amount of \$12,500.

24 Do you see that?

25 A. Sure.

Page 172

1 J. SIMPSON

2 Q. Is that a transfer you made
3 from 1640 Motors LLC to YJ Simco?

4 A. It looks like it -- again, I'm
5 not familiar with it. I would have to -- I
6 mean, it appears so. I don't know these
7 documents like the back of my hand. It's
8 the first time I'm looking at them in
9 substance in a long time. It appears
10 that's the way. Why, I can't tell you --

11 Q. I'm not asking you why.

12 A. Of course. You're just trying
13 to corner me.

14 Q. I'm asking you the questions I
15 ask.

16 Did you make this transfer
17 during the JJ Arch LLC bankruptcy?

18 A. I believe bankruptcy was
19 outstanding during that time.

20 Q. And did you report this
21 transfer to the United States Bankruptcy
22 Court?

23 A. I don't know. I don't have it
24 in front of me. I don't know.

25 Q. Did you report this transfer to

Page 173

1 J. SIMPSON

2 Jared Chassen?

3 A. No. I never reported anything
4 to him. Documents he can look at them. He
5 has copies of all the Chase stuff. Not YJ
6 Simco, but 1640. He can see what I did or
7 didn't do. 1640 he had access, so he was
8 reported to it, yes, 1640.

9 Q. If I can turn your attention to
10 148, if you look there you'll see that
11 there's a transfer on 9/10. It's dated
12 9/10. It says Fedwire credit via Citizens
13 Bank from 1640 Motors in the amount of
14 \$15,000.

15 Was that a transfer you made
16 from 1640 Motors LLC to YJ Simco?

17 A. It appears so. If you look at
18 the moneys on other side, have you done
19 that math? You're never going to bring
20 that up because you're trying to corner me.
21 Go ahead. Of course not. Of course not.
22 So on the record we'll say he goes both
23 ways and he's only doing one. Go ahead,
24 next.

25 Q. Was this transfer made during

Page 174

1 J. SIMPSON

2 the JJ Arch bankruptcy, yes or no?

3 A. I believe so. And I cannot
4 tell you if it was imported. I don't know.

5 Q. I'll ask you that question and
6 you'll answer that question. Has not been
7 posed yet.

8 Did you report this transfer to
9 the United States Bankruptcy Court, yes or
10 no?

11 A. I don't know.

12 Q. If you also look right above
13 there, there's a transfer from an entity
14 called JS -- there's a deposit from JSS at
15 management LLC.

16 A. Yes.

17 Q. Can you tell me about what that
18 transfer was for?

19 A. You already asked me that
20 question, and I told you that it was
21 something I did as a one-off consulting
22 assignment that has nothing to do with
23 Arch. The JS is not Jeffrey Simpson. It's
24 a different company. Nothing to do with
25 me. It's a third-party company.

Page 175

1 J. SIMPSON

2 Q. And if we continue looking
3 through this document --

4 A. Can't wait to --

5 Q. I'm going to take you down to
6 the document page number ending 167 if you
7 take that look at that.

8 A. Yeah.

9 Q. Do you see on 1217 that there
10 is a transfer from Citizens Bank to 1640
11 Motors LLC from -- strike that.

12 Do you see that there's a
13 transfer from --

14 A. Right.

15 Q. -- 1640 Motors LLC Citizens
16 Bank account to YJ Simco in the amount of
17 7500?

18 A. Yup.

19 Q. Was that a transfer you made
20 from --

21 A. Yes.

22 Q. -- from YJ Simco --

23 A. Do you remember the Court Order
24 where the Judge said that a transfer --

25 Q. I asked a very straightforward

Page 176

1 J. SIMPSON

2 question. Was it, yes or no?

3 A. Yes. Next. Keep going with
4 your nonsense.

5 Q. And was this transfer made
6 while the -- there was a foreclosure
7 proceeding pending against the 1640 Montauk
8 property, yes or no?

9 A. I don't know when that -- when
10 I became aware of that. I would have to
11 look and see. I don't know. I'm not sure
12 that I was aware of it at that time. I
13 don't know.

14 Q. And if I could turn your
15 attention further in this document to the
16 ending in Bates stamp 174, if I can point
17 your attention to deposits and additions,
18 we're dated 110 which says that it's a
19 Fedwire credit via Citizens Bank from 1640
20 Motors to YJ Simco in the amount of \$5,000?

21 A. Yup.

22 Q. Do you see that?

23 A. I do.

24 Q. Is that a transfer that you
25 made from --

Page 177

1 J. SIMPSON

2 A. Looks like it.

3 Q. -- 1640 Motors to YJ Simco?

4 A. Looks like it, yeah.

5 Q. And was the mortgage loan if
6 the 1640 Montauk LLC property in default at
7 the time that you made this transfer --

8 A. I still have a bill for a
9 mortgage payment.

10 Q. I asked you a very straight --

11 A. Again, how does one pay the
12 bills? You're in dreamland.

13 Q. Was it in default, yes or no?

14 A. Apparently so. Allegedly.
15 Allegedly.

16 Q. So when this payment was made,
17 the mortgage was in default, correct?

18 A. The mortgage -- I've asked for
19 bills. They refused to give them.

20 Q. The foreclosure was pending
21 when this payment was made, correct?

22 A. A long-term judicial
23 foreclosure was started, regardless of
24 right or wrong. Not a UCC, foreclosure, a
25 long-term judicial foreclosure was started,

Page 178

1 J. SIMPSON

2 allegedly.

3 Q. And if I turn your attention
4 down to the next one, the next lines dated
5 January 14th and this is of 2025, it says
6 Fedwire credit via Citizens Bank 1640
7 Motors LLC to YJ Simco for \$14,000.

8 Do you see that?

9 A. Yes.

10 Q. Did you make a transfer from
11 1640 Motors Citizens Bank account to YJ
12 Simco in this amount on this day?

13 A. Yes.

14 Q. And was a foreclosure pending
15 against the 1640 Montauk LLC property when
16 you made the transfer?

17 A. Same issue.

18 Q. Yes or no? It's a yes or no.

19 A. Yes. Allegedly.

20 Q. And if I can turn your
21 attention to the next line -- two lines
22 down on January 21st, do you see where it
23 says Fedwire credit via Citizens Bank, 1640
24 Motors to YJ Simco in the amount of \$5,000.

25 Do you see that?

Page 179

1 J. SIMPSON

2 A. Yes, sir. Go ahead. What
3 else?

4 Q. Did you, in fact, make a
5 transfer from Citizens Bank 1640 Motors LLC
6 account to YJ Simco on January 21st of
7 2025?

8 A. It looks like it. Mm-hmm.

9 Q. Did you do it?

10 A. Apparently.

11 Q. Okay. And was there a
12 foreclosure proceeding pending against the
13 1640 Montauk LLC property when you made
14 this transfer?

15 A. Again, there's allegations.

16 Q. If I can turn attention down,
17 further down to the next page, this is on
18 page 175. You'll see on January 29th that
19 there is a Fedwire credit, Fed credit wire
20 via Citizens Bank 1640 Motors LLC to YJ
21 Simco in the amount of \$10,000 on
22 January 29th of 2025.

23 Do you see that?

24 A. Mm-hmm.

25 Q. Did you, in fact, make a

Page 180

1 J. SIMPSON
2 transfer of \$10,000 from 1640 Motors LLC
3 Citizens Bank account to YJ Simco on
4 January 25th of 2025?

5 A. Apparently. I would love to
6 also see all the credits we sent the other
7 way. Woh, woh, woh, look at 1/29. Fedwire
8 10,000 in, ha. Yeah, exactly. It's a
9 gaming chip question. Look at the ins and
10 outs. Let's go back to your questionings
11 earlier.

12 Q. Yes or no, Mr. Simpson --

13 A. Yes. But look at the deposits.

14 Q. Yes or no, did you make this
15 transfer of \$10,000?

16 A. Yes, yes, yes. And look
17 upstairs. Look at the deposit. It's net
18 zero. Look upstairs. Look at the nine
19 number --

20 Q. I'm asking you questions.

21 A. Look upstairs. You department
22 ask a loaded question.

23 Q. It's not a loaded question.
24 This is a factual question.

25 A. And the factual answer is

Page 181

1 J. SIMPSON

2 \$10,000 is the other way too.

3 Q. On January --

4 A. Yes, yes. Also us deposited
5 too. Go for it.

6 Q. Did you make this transfer of
7 \$10,000 --

8 A. Yes.

9 Q. -- from 1640 Motors LLC
10 Citizens Bank account --

11 A. Also deposited \$10,000 in there
12 too right above it, same page. Scum.

13 Yeah? What else you got? Next. Keep
14 going. Let's go. The answer was yes.
15 Keep going. Enough. You're wasting my
16 time here.

17 Q. Was the a foreclosure
18 pending on the --

19 A. Yeah. And the money I injected
20 \$10,000, the same time.

21 Q. Yes or no --

22 A. Yes. And money injected 10,000
23 on the record. Yes, I injected 10,000 the
24 same day. Yes. Scum. Next. You're a
25 liar. You shouldn't even be a lawyer

Page 182

1 J. SIMPSON
2 anymore. You've lied to the Judge just two
3 days ago. Go ahead. No, it's true. You
4 lied. We shouldn't even be doing this
5 because you're a liar. Shouldn't have a
6 license. Next.

7 Q. So there was a foreclosure
8 pending, Mr. Simpson?

9 A. Allegedly, yes. And, again, I
10 put money in the same time as money went
11 out. You're just playing the game because
12 you keep playing a game, a dirty game.
13 Next.

14 Q. And Mr. Chassen, Mr. Simpson,
15 is a guarantor on the mortgage --

16 A. Yeah. You know what 4.2D says?
17 It says Chassen when he's wiped out will
18 stay and do what I tell him to do because
19 he works for he. He works for me. Read
20 the documents. He's gone, 4.2D, member
21 loan. Goodbye. You lied to the Judge.
22 You lied to the Judge about the fraudulent
23 loan as you tried to call it about a
24 fraudulent loan. Let's go to the statement
25 of where I've lent 500,000 to Chassen.

Page 183

1 J. SIMPSON

2 Let's role to that. You want to see where
3 that is. Let's go -- disgusting pig he is.

4 MR. LORENCE: Stop.

5 Q. I'm taking the deposition --

6 A. You're making the deposition of
7 a lying guy that shouldn't even be licensed
8 anymore.

9 MR. LORENCE: Jeff, there's no
10 question. Stop talking.

11 A. Scum of the earth. Go ahead.
12 You've lied to the Court every single time.
13 Go ahead. That's okay. We'll have an
14 investigation of you in a different kind of
15 way.

16 Q. Mr. Simpson, are you
17 threatening me?

18 A. No. You'll be investigated. I
19 made a complaint about you for the bar for
20 lying.

21 MR. LORENCE: Stop talking.

22 A. It's all on the record. You
23 lie. And when it hurts me, it's going to
24 be reported. That threat is a promise.

25 Q. All right, Mr. Simpson. I'm

Page 184

1 J. SIMPSON

2 going to be introducing another exhibit for
3 you to look at if you can --

4 A. Great.

5 Q. -- bear with me for a moment.

6 I'm going to do it momentarily, okay?

7 A. I think you should put up 4.2D
8 your last question.

9 Q. Mr. Simpson, I'm the one taking
10 the deposition.

11 A. Yeah, yeah, yeah. You're the
12 one lying, but go ahead. Wasting my time.
13 Wasting my day with this nonsense. Just
14 like she tried to do in another hearing.

15 MR. LORENC: Stop talking,
16 please.

17 Q. All right, Mr. Simpson, I'm
18 going to be producing what is marked on the
19 document as Exhibit C4.

20 (Whereupon, Exhibit C4 loan
21 document for 16 Montauk was marked
22 for identification as of this date.)

23 A. I'm trying to get to the
24 exhibit page. I need a minute. I'm having
25 a hard time with this.

Page 185

1 J. SIMPSON

2 MR. LORENCE: Is it going to be
3 labeled Exhibit 5?

4 MR. SCHWARTZ: It's going to
5 come out C5, but it's C4 on the
6 document.

7 A. Exhibit 5?

8 Q. Yes.

9 A. Keep whispering.

10 MS. THORNE: The food is here.

11 A. Disgusting pigs.

12 MR. LORENCE: Can we go off the
13 record?

14 MR. SCHWARTZ: I'm almost done
15 with this line.

16 A. I can't watch them eat. I'm
17 going to vomit.

18 MR. SCHWARTZ: I have a line of
19 questioning and then we can.

20 A. Lunch for them. Not near me.

21 Q. Mr. Simpson, I've shown what's
22 been marked as Exhibit C4 to you.

23 Have you had a chance to look
24 at this document?

25 A. I'm looking at it now for the

Page 186

1 J. SIMPSON
2 first time. If I've ever seen it before it
3 would be a long time. It's not something
4 I'm familiar with it. It's from 2022. I
5 see I've signed it, but I don't know the
6 details of this document. So what are you
7 asking?

8 Q. Do you recognize the document?

9 A. I see it's one of the many loan
10 documents for 16 Montauk in connection
11 with --

12 Q. Is that your signature on the
13 document?

14 A. Yes.

15 Q. Does that look like your
16 signature?

17 A. Yes. What would you like to
18 know?

19 Q. And do you see that this
20 document is entitled assignment of leases
21 and rents --

22 A. Yeah.

23 Q. And it says by 1640 Montauk LLC
24 to ConnectOne Bank?

25 A. Sure, yeah.

Page 187

1 J. SIMPSON

2 Q. Okay. And do you see that you
3 have?

4 A. All types of transfers in here
5 that your client should have done.

6 MR. LORENC: Everything you're
7 saying right now is being recorded.

8 A. I know. I know.

9 Q. And so does this document --
10 this document, Mr. Simpson, was this
11 entered into in connection with the loan
12 that was made to 1640 Montauk from
13 ConnectOne Bank?

14 A. It appears that way. I can't
15 verify it. I don't know this document off
16 the top of my head, so I would have to look
17 it up; but it appears so. I can't say
18 definitively.

19 Q. Okay. And do you see where it
20 says in the now, therefore -- it says now,
21 therefore, on the -- I think it's the
22 second page of the document -- of the
23 document under -- in the recitals where it
24 says: Now, therefore, in order to better
25 secure the payment of the debt to the

Page 188

1 J. SIMPSON
2 assignee and payment of all taxes
3 assessments, water rates, and meter
4 charges, which may now be due and unpaid or
5 which may hereafter become due in a charge
6 against or a lien upon the mortgage
7 property with interest and penalties hereon
8 the assignor hereby assigns to the assignee
9 all of the rents, issues, and profits due
10 and due to become -- and to become due from
11 the mortgage property including but not
12 limited to the rents together with all
13 contracts and leases affecting the mortgage
14 property.

15 Do you see that?

16 A. It's a standard provision. I
17 see the standard provision. What are you
18 getting at?

19 Q. Does that mean that the lender
20 had entitlement to rents at the property?

21 A. The lender gets paid debt
22 service, and there's a whole bunch of other
23 provisions that I have to look at to answer
24 your question, right? In general, the
25 reason that you do assignments of leases of

Page 189

1 J. SIMPSON
2 rents as documents is in the event of a
3 foreclosure, they want to know that those
4 leases will carry forward. It's not ever
5 looked at in the world you're coming from.
6 I've done tons of commercial loans in my
7 life, and it's not what you're saying at
8 all the. That's just not the purpose of
9 the document.

10 Q. But if the mortgage had been in
11 default --

12 A. I don't have a bill.

13 Q. -- you would agree that the
14 lender had rights --

15 A. I didn't have a bill.

16 Q. -- to certain profits?

17 A. Profits? No.

18 Q. Profits and rents?

19 A. No, no. That's not how it
20 works. Lenders are entitled to a repayment
21 and debt service payments, and they send
22 you a notice that there's a payment that's
23 due and a default that's due and I made a
24 good faith effort as I showed you and I'll
25 show you again to pay every bill I could

Page 190

1 J. SIMPSON

2 with a lender, right, and that's what I
3 did.

4 So this was a lease beyond --
5 assignment leases of rents is the purpose
6 of a foreclosure. You're assigning the
7 leases to a lender in the event they
8 foreclose that they then now have the
9 leases. This is not the purpose -- that's
10 not what it's there for.

11 Q. Is there a foreclosure pending
12 against the 1640 Montauk property?

13 A. There's a lender bought the
14 loan -- thank you, Jared Chassen, the
15 lender himself deposed him told me when
16 Jared did what he did, he sold all our
17 loans. So, yes, so there is because of
18 Jared's actions in August. They sold the
19 loans. The new lender, I don't even know
20 his name.

21 Q. When did that foreclosure
22 start?

23 A. I don't know. I told you I
24 only learned about it, like, three months
25 ago.

Page 191

1 J. SIMPSON

2 Q. But there is a foreclosure?

3 A. There's a ledger foreclosure, a
4 judicial foreclosure with the years and has
5 already been defended. Thank you for
6 supporting against it and we crushed that
7 too. We crushed with your stupidity that
8 you did because if he's a guarantor against
9 his agreement, he went and tried to support
10 a receiver motion for this lender. Who
11 could do that under a JJ agreement? How
12 could you possibly do that? It's against
13 the agreement. You're going to turn colors
14 you never seen. I can't wait. I can't
15 wait. This is reaching beyond. This is
16 stupidity. This is stupidity.

17 Q. Mr. Simpson, I would like to
18 show you another exhibit if --

19 A. Good. Keep going. I wished
20 you learned a little about loans. Keep
21 going. Nothing about it. Next. Nothing
22 about transactions, yup. Next.

23 Q. Okay. Bear with me one second.
24 I would like to show you what has been
25 marked as Exhibit 5, C5. It's coming up as

Page 192

1 J. SIMPSON

2 Exhibit 6 on your screen.

3 (Whereupon, Exhibit C5 Global
4 Notes and Statement of Limitations
5 Methodology and Disclaimer Regarded
6 the Debtor's Schedules and Statement
7 of Financial Affairs in connection
8 with the JJ Arch LLC Bankruptcy was
9 marked for identification as of this
10 date.)

11 A. Yup.

12 Q. It's called Global Notes and
13 Statement of Limitations Methodology and
14 Disclaimer Regarded the Debtor's Schedules
15 and Statement of Financial Affairs in
16 connection with the JJ Arch LLC Bankruptcy.

17 Do you recognize this document?

18 A. I do.

19 Q. Did you review this document
20 before it was filed?

21 A. I believe so.

22 Q. Did you sign this document?

23 A. I believe so.

24 Q. Okay.

25 A. What's your issue?

Page 193

1 J. SIMPSON

2 Q. So if I could turn your
3 attention to what is page, I believe, 8 out
4 of 32. It's page two of the official
5 Form 207.

6 A. Wait a minute.

7 Q. But it's page eight of the --
8 in the document.

9 A. Hold on. I don't have page
10 numbers here on the PDF, so where in the
11 document is it?

12 Q. It's -- you see where it says
13 official Form 207 Statement of Financial
14 Affairs For Non-Individuals Filing For
15 Bankruptcy?

16 A. Yeah.

17 Q. So if you go down to the next
18 page?

19 A. Yup.

20 Q. You'll see that it lists a
21 bunch of -- several creditors?

22 A. Yup.

23 Q. Names and addresses?

24 A. Yeah.

25 Q. Okay. So if I could turn your

Page 194

1 J. SIMPSON

2 attention to 3.1, it lists YJ Simco LLC as
3 a creditor?

4 A. Yes.

5 Q. And then it says that it was
6 paid on February 14th, 2024, the total
7 amount of \$38,000. You see that?

8 A. Yeah, I do.

9 Q. Is that, in fact, what happened
10 that YJ Simco was paid a total of \$38,000
11 from JJ Arch LLC?

12 A. That's not what this says.
13 It's the other way around.

14 Q. What do you think this says?

15 A. I think what it's saying is
16 that it's a creditor. It means that it's
17 owed 38,000. That's what this is. These
18 are moneys owed if I understand it
19 correctly. Let me check.

20 Q. If you look above it on the
21 page before it says three, certain payments
22 or transfers to creditors within 90 days
23 before filing this case.

24 A. Okay. Let me see if I'm mixing
25 up schedules. Okay. It appears that these

Page 195

1 J. SIMPSON
2 are payments -- I think you're right. I'm
3 not sure. But I think these are payments
4 that were made. I'm not familiar with it
5 off the top of my head, but it appears that
6 way.

7 Q. Do you see where it says right
8 next to it where it says reason for payment
9 or transfer and it --

10 A. Yeah.

11 Q. -- it checks one of the box and
12 then puts in the word reimbursement for
13 various loans that YJ Simco has made to the
14 debtors investment entity.

15 Do you see that?

16 A. Yes.

17 Q. So does that refresh your
18 recollection about this \$38,000 payment
19 that you listed here?

20 A. I don't know off the top of my
21 head. I could tell you as I've told you
22 already today, and I'll tell you again, we
23 spent money to help pay for payroll many a
24 times and there was moneys in now because
25 there's no other source of revenue to get

Page 196

1 J. SIMPSON
2 that business to pay payroll; and it's
3 likely possible, without me studying it and
4 not knowing it, that YJ Simco funded money
5 to this entity to cover costs like payroll,
6 insurance, et cetera, and it's our
7 reimbursement. That's likely the case.
8 There's nothing about the documents that
9 would allow me not to do that.

10 Q. Okay. And then if you see
11 below there, it lists payments to Adam
12 Leitman Bailey PC?

13 A. Yes.

14 Q. It has the dates August 9th,
15 October 6th, and October -- I believe that
16 is October 25th of 2023 or August 25th of
17 2023. Excuse me. And then it has the
18 amount of \$165,000.

19 Are those, in fact, payments
20 that were made to Adam Leitman Bailey PC?

21 A. Those are payments that were
22 made via my funds that were transferred
23 from one of my accounts, most likely, I
24 have to check, it's possible it past
25 through JJ or Arch because there's

Page 197

1 J. SIMPSON
2 engagement letters with Arch. But it would
3 have been from my funding. I would have
4 funded the money to make those payments to
5 him. It came from me, started from me, and
6 I could trace it if anybody wants to see
7 it.

8 Q. But if you see the reasons for
9 the payment or transfer, you say other Arch
10 Real Estate Holdings?

11 A. Yeah, yeah, lawsuit.

12 Q. What does that mean?

13 A. It's the lawsuit. It was the
14 lawsuit that these guys attacked my
15 company, yeah. That's what it was. These
16 guys attacked my company including you,
17 yes.

18 Q. But did Adam Leitman Bailey PC
19 represent Arch Real Estate Holdings LLC?

20 A. Yes. His engagement letter was
21 Arch, JJ Arch, and Jeffrey Simpson. He
22 later put on the docket something that's
23 fraudulent and it says there were two
24 engagement letters, the very first
25 engagement letter said Jeffrey Simpson.

Page 198

1 J. SIMPSON
2 And it was for \$15,000 because I lost
3 access to everything thank you to your
4 legal activities. You stole my access to
5 everything lady, everything. Improperly,
6 JP Morgan, you name it. Okay. And we'll
7 depose all those people, and I had no
8 access to any papers. So what we did was,
9 Adam said you got to go to Court right
10 away, I need money. So I sent it to a
11 personal account, and then I amended the
12 engagement letter with him. Looked at the
13 caption and everything. It was on behalf
14 of Arch that we were taking control back of
15 the company, which we did, right. We did
16 until these guys became -- while suing me
17 in Federal Court.

18 Q. So this \$165,000 that was made
19 over these three dates, where did that
20 money come from directly?

21 A. Me.

22 Q. Which bank account --

23 A. I don't know.

24 Q. -- did it come from?

25 A. I would to look. Either

Page 199

1 J. SIMPSON

2 Jeffrey Simpson personal account or YJ
3 Simco or one of my personal accounts.

4 Q. Did it come from a JJ Arch LLC
5 account?

6 A. I think on the -- I think I
7 funded from my personal account to JJ and
8 then to Arch. I would fund it first
9 through that order.

10 Q. So it went through JJ Arch?

11 A. Yes. It should have. It's
12 supposed to. That's what it says. If I'm
13 a managing member, I shouldn't fund that
14 stuff in my pocket. If they ^ tole ^ toll
15 my company --

16 Q. Even though they were
17 representing you personally?

18 A. It was representing three
19 different entities, Arch, JJ, and me. It's
20 all mine anyway. It's all me anyway. It's
21 all mine. It doesn't actually matter. By
22 the way, Adam is a second engagement
23 letter. Even his later papers in Court are
24 dead wrong. He lied. I showed him how he
25 lied. They're not even correct.

Page 200

1 J. SIMPSON

2 So there's a second engagement
3 letter that says representing which is like
4 you hired the guy who was on the phone
5 here, Jeremy, which I don't even know how
6 Olshan should be in this case because they
7 have a lot more ethics than you do
8 generally as a firm. I don't know how --

9 (Reporter clarification.)

10 A. I was a managing member of
11 everything; and if I hired Adam Leitman
12 Bailey, Olshan, whoever I hired, I had a
13 choice to do it.

14 Q. What about the next one, AY
15 Strauss payment?

16 A. Same thing, same thing.

17 Q. Who made that \$10,000 payment?

18 A. Me, personally, my funding was
19 paid for it somehow through me on behalf of
20 the entities that were sued.

21 Q. Did it go through JJ Arch?

22 A. I believe so, again, first with
23 my cash. I funded it. There were not
24 available funds. I funded it.

25 Q. And this representation was, it

Page 201

1 J. SIMPSON

2 says the purpose of it was --

3 A. Because it was you stealing.

4 Q. -- YJ Simco for JJ Arch?

5 A. Yeah. Stole the company.

6 That's right.

7 Q. And this payment is dated
8 August 10th, 2023?

9 A. Yes. It was first letter that
10 sent to you for you stealing my company,
11 yes.

12 Q. Why would YJ Simco be included
13 as a reason for the payment or transfer?

14 A. Because it probably paid for it
15 because I have no access to bank account
16 because you stole my bank account access.
17 I went to the bank. They told me we don't
18 have your name here after I had hundreds of
19 accounts there. Thank you to you guys for
20 what you've done. That's what First
21 Republic told me the next day on
22 August 7th. I can't wait to get to those
23 questions. Let's get to that. That would
24 be fun. Theft.

25 Q. Okay. So --

Page 202

1 J. SIMPSON

2 A. All of this could be sourced if
3 someone wanted to see it of how those
4 moneys came from. It would be my pleasure
5 to show you.

6 Q. We've been making that request
7 for all bank statements. We're still
8 waiting for those things.

9 A. You asked everything in the
10 kitchen sink. He will response to it in
11 due course.

12 Q. Mr. Simpson, if I can turn
13 again -- this was a document that you were
14 able to review before it was filed,
15 correct?

16 A. Yes. What are you getting at?
17 What's your question?

18 Q. And you signed this document,
19 correct?

20 A. What's your question?

21 Q. That's the question I'm asking
22 you.

23 A. I didn't look at it carefully.
24 It's many months old. I will study it to
25 answer you, but it looks like something I

Page 203

1 J. SIMPSON

2 signed. What's your question?

3 Q. Then study it and answer the
4 question?

5 A. What's your question? Get to
6 it.

7 Q. My question is, did you review
8 this document before you sign it was filed?

9 A. I signed it. Is this the
10 accurate document? I don't know.

11 Q. Look it over. Did you sign
12 this document is my question.

13 A. I can't tell you if it's
14 complete. I signed the document. Is this
15 the complete and the right exhibits? I
16 don't know. But I signed the document.
17 That looks correct. And it had a lot of
18 exhibits, and I can't see if they're all
19 here. I have no way off the top of my head
20 without looking to see if it was filed
21 properly or if it's been amended because
22 our friend Ms. Thorne likes to amend stuff
23 and file stuff. She's altered documents.
24 I don't know if this has been altered or
25 not; but in concept, this is a document

Page 204

1 J. SIMPSON

2 that I signed. I can't tell you if this is
3 the final version. I can't tell you if
4 it's complete.

5 Q. Do you have any reason to
6 believe that Ms. Thorne has altered this
7 document?

8 A. I know she's altered other
9 things. You've altered other things, so
10 it's hard to know. You have altered things
11 to the Court officially, so I cannot assess
12 what you have or haven't done here.

13 Q. If I can turn your attention on
14 page 14 on statement of financial affairs,
15 do you see that, page 14, where
16 Paragraph 28, it says list the debtors
17 officers; and it lists Jeffrey Simpson as
18 managing member with a 100 percent
19 interest.

20 Do you see that?

21 A. Page 14. Hold on. 14 in the
22 first section? Where. It's because
23 multiple documents.

24 Q. It's page 14 --

25 A. From the beginning?

Page 205

1 J. SIMPSON

2 Q. Page 14 on the official
3 Form 207 on the bottom left and then
4 page 14 of that.

5 A. Going there now. Going there
6 now. Yeah. Go ahead. Where?

7 Q. Do you see where it lists the
8 debtors officers?

9 A. Yes.

10 Q. And you list Jeffrey Simpson as
11 the 100 percent member?

12 A. Absolutely.

13 Q. And then do you see below that
14 that you list Jared Chassen as he had a
15 position between December 27th and
16 August 2023?

17 A. Yes.

18 Q. You do see that. And that's
19 what you listed, correct?

20 A. It's correct. It's a hundred
21 percent correct.

22 Q. You believe that that is
23 correct today?

24 A. I know it's correct for five
25 reasons you've seen to the Court. 4.2D, we

Page 206

1 J. SIMPSON
2 can go through every part. He's gone and
3 wiped out. He's hanging by a thread to the
4 Court as I told you in the letter you saw.
5 He's hanging by a thread. Other than the
6 Court, he would have been gone. He told me
7 he was gone in August. So he's gone.

8 Q. So if I can take you --

9 A. Only the Court somehow dangling
10 him around. I don't know who's paying you.

11 Q. -- where it says signature and
12 declaration. It says: Warning, bankruptcy
13 fraud is a serious crime making a false
14 statement concerning property -- or
15 obtaining money or property by fraud in
16 connection with the bankruptcy case Can
17 result in fines of up \$500,000 or
18 imprisonment of up to 20 years or both.
19 And then it says: I have examined the
20 information in this --

21 A. Yeah.

22 Q. -- statement and any
23 attachments and have a reasonable belief
24 that the information is true and correct.
25 I declare under penalty of perjury that the

Page 207

1 J. SIMPSON

2 foregoing is true and correct.

3 Do you see that? And then do
4 you see it says that it was executed on
5 March 23rd, 2024, by Jeffrey Simpson. Do
6 you see that?

7 A. I'm trying to find the page. I
8 believe it says that. That's probably
9 right. Yes, that's correct.

10 Q. Did you sign this under penalty
11 of perjury?

12 A. Absolutely because he's gone.
13 Chassen is gone, gone.

14 Q. No long a member --

15 A. He has not been. He lost his
16 interest on August 31st. He lost his
17 interest on August 6th. We can go through
18 it over and over again. He's lost his
19 interest for all the reasons the documents
20 say. Depose David Hayman (phonetic) and he
21 will confirm for you other than the Court
22 for whatever reason as I've said to the
23 Judge, it makes no sense the guys around.
24 Gone. You guys colluded with him. You did
25 bad acts. He stole money. He lied to me.

Page 208

1 J. SIMPSON

2 He broke the rules. He was fired, gone,
3 the end. The Judge fired him for me after
4 he warned to. He said to you, Schwartz, if
5 you go after Simpson for contempt, I'm
6 giving you a warning, if you go after him
7 for contempt, the result for you,
8 Mr. Schwartz, if you aren't successful in
9 the contempt, I want you to think hard and
10 long about what will happen. And you know
11 what? He was fired, gone, done, done.
12 Done. 4.2D, done. You name it, done.
13 He's gone. He did theft. 3.75B
14 resignation. Any lawyer with half a brain
15 looks at this case and says, this guy is
16 gone. How is he still there?

17 So other than you two, which
18 are in cahoots together, no one in their
19 right mind thinks so. So I signed this
20 properly, the man is gone. Why the Court
21 has dangled him with a thread who just
22 doesn't understand the things as the Judge
23 told us, he has 400 cases, he's too busy to
24 pay attention. You two have duped him.
25 Jared's gone. You couldn't do what you did

Page 209

1 J. SIMPSON

2 with him.

3 And by the way, the memo to
4 him, you broke the rules right there
5 because 7.2.2 says you can't do that and
6 you did that. You did that. You're
7 partner did that.

8 Q. Who are you referring to?

9 A. I'm talking to Leslie Thorne
10 next to you when she sent a note and
11 meddled my company after I told her clients
12 that they had to stop doing the bad acts
13 they were doing and she says to Chassen in
14 an email, Chassen, we want you to be
15 managing member of the company going
16 forward. They didn't have the right to do
17 that. It's solicitation.

18 Q. Leslie Thorne is not being
19 deposed here today.

20 A. It doesn't matter. I said to
21 Chassen, you need to respond to the letter
22 that was send to you by Haynes Boone, you
23 need to respond and say you're not going to
24 do this. And he said I will not do that;
25 and at that point forward, that's cause. A

Page 210

1 J. SIMPSON
2 solicitation occurred, and he refused to
3 take my direction and then lied to me; and
4 you'll find out further. Michelle Miller
5 lied to me, his brother-in-law. We can
6 keep going all the people who said we lied.

7 Q. Let's take a break now for
8 lunch.

9 A. You're trying to avoid me
10 telling truth on the record. That's what
11 happened. He's gone. 10 days to Sunday.
12 Dead, gone.

13 Q. Ms. Thorne is not being deposed
14 here today.

15 A. No. Jared Chassen, he's gone.
16 You asked the question about a hundred
17 percent interest. You asked the question;
18 didn't you?

19 MR. LORENC: Are we taking the
20 break for lunch or not?

21 A. I wouldn't. I want to get done
22 with this nonsense.

23 VIDEOGRAPHER: Off the record
24 at 14:07 ending media unit number
25 two.

Page 211

1 J. SIMPSON

2 (Whereupon, a short recess was
3 taken.)

4 VIDEOGRAPHER: On the record at
5 14:47, beginning media unit number
6 three.

7 Q. Okay, Mr. Simpson. I would
8 like to show you what's going to be marked
9 as Exhibit C6. It is going to appear on
10 your screen though under the 7, Exhibit 7,
11 but on the document it will be C6.

12 (Whereupon, Exhibit C6 Order
13 Regarding Interim Operating
14 Procedures was marked for
15 identification as of this date.)

16 Q. If you can take a moment to
17 look at that.

18 Do you recognize this document,
19 Mr. Simpson?

20 A. One minute, please.

21 Yes. Go ahead. What's your
22 question?

23 Q. What do you recognize this
24 document to be?

25 A. This document --

Page 212

1 J. SIMPSON

2 Q. Strike that question. Strike
3 that.

4 A. It's a injunction that I got
5 against Chassen for his bad acts; so if you
6 reference all of the source documents up
7 top and it will show you all the things he
8 did with stealing the bank accounts, with
9 stealing my company, and this was not a
10 restoration as you like to refer to it in
11 Court. This is confirming that I run this
12 company. That's what this is. That's what
13 this is. It's an injunction that is
14 definitive.

15 Q. Is this a document labeled
16 order regarding interim operating
17 procedures; is that what it says there on
18 the top right-hand corner?

19 A. It is.

20 Q. Is this an order that you
21 obtained, yes or no?

22 A. It is.

23 Q. This is an order that you
24 obtained, correct?

25 A. Yes. I believe Motion 1 was

Page 213

1 J. SIMPSON

2 mine.

3 Q. Okay. And if you look at this
4 order, Mr. Simpson, on the second page, do
5 you see where it says in Paragraph 2 it
6 says the August 2023 instruments sent by
7 Simpson and Chassen to the other
8 purportedly resigning or terminating the
9 other as a member or managing member of JJ
10 Arch are hereby void and have no force and
11 effect.

12 Do you see that language?

13 A. I do.

14 Q. Okay. And were you aware of
15 that, Mr. Simpson?

16 A. I was.

17 Q. Okay. And do you see -- do you
18 see the next paragraph it says: JJ Arch
19 shall be managed in accordance with
20 Section 3.1 of the limited liability
21 company operating agreement of JJ Arch
22 LLC specifically -- dated December 11th,
23 2017, as amended by Amendment 1 dated May
24 22nd, 2021.

25 Do you see that?

Page 214

1 J. SIMPSON

2 A. Oh, I do.

3 Q. And you were aware of that too?

4 A. I am. And I'm also aware the
5 Judge said that as of 2021, Chassen had no
6 rights; and he said that in the hearing
7 right before this on the transcript, so
8 this does not do what you think it does.
9 This does not extend Jared's lapse of
10 abilities. He lapsed out in 2021, done,
11 the end, goodbye.

12 Q. The next sentence says:
13 Specifically, the business affairs and
14 assets of JJ Arch shall be managed by
15 Simpson's subject to the limitations set
16 forth in --

17 A. It doesn't have a date.

18 Q. Excuse me, Mr. Simpson. I'm
19 still reading it out loud, and I'll start
20 again.

21 Do you see where it says, Mr.
22 Simpson, the next sentence: Specifically
23 the business affairs and assets of JJ Arch
24 shall be managed by Simpson, subject to the
25 limitations set forth in Section 3.2 of the

Page 215

1 J. SIMPSON

2 JJ Arch operating agreement which provides
3 among other things that any company major
4 decision as defined in the JJ Arch
5 operating agreement shall be undertaken
6 only with the prior written consent of
7 Chassen.

8 Do you see that, Mr. Simpson?

9 A. I do. And I'm going --

10 Q. That's that only question I
11 asked.

12 A. I don't care. The date isn't
13 here. It lapsed. It lapsed. It's not.
14 Specific. Keep going. Lapsed.

15 Q. Do you see you answered yes?

16 A. I do. And it lapsed.

17 Q. Were you aware of this
18 provision?

19 A. I was aware in my --

20 Q. Yes or no?

21 A. Paragraph 39 I mentioned 2021
22 and Judge Cohen said 2021. And he agreed
23 with me the 2021 Chassen had no more
24 rights. This does not grant him rights.
25 So the answer is yes, wholeheartedly, it

Page 216

1 J. SIMPSON

2 does not grant rights.

3 Q. You were aware of this
4 provision though?

5 A. Yes. Again, read the
6 provision, 2021, he's done.

7 Q. Let's go to the next sentence.

8 A. Done.

9 Q. Let's go to the next sentence.

10 Simpson and Chassen shall
11 cooperate with each other in good faith to
12 facilitate the effective exercise of their
13 respective roles and responsibilities under
14 the JJ Arch operating agreements and
15 related --

16 A. Without a date.

17 Q. Do you see that provision?

18 A. Yes, without a date.

19 Q. You were aware -

20 A. I was aware he came to the
21 office as disaster. Horrible.

22 Q. This order, Mr. Simpson --

23 A. Horrible.

24 Q. This order Mr. Simpson is dated
25 August --

Page 217

1 J. SIMPSON

2 A. Yeah. And I fired him again.

3 Q. This order is dated --

4 A. Because he did bad shit. Yeah.

5 Yeah. Bad, bad stuff. I know what it

6 says. Absolutely.

7 Q. This order is dated

8 August 21st, 2023; is that correct?

9 A. Yes.

10 Q. And you were aware of it?

11 A. Yeah. And I'm aware --

12 Q. And you were --

13 A. 2021 doesn't have rights Judge
14 Cohen said it. Let's go to the transcript.

15 MR. LORENC: Jeff, let the

16 question --

17 A. Keep coming from your nonsense.
18 Keep spinning things. Keep going. You
19 can't say it with a straight face because
20 you're lying.

21 Q. You're aware of this document,
22 Mr. Simpson, on August 21st, 2023?

23 A. Yes. I was. And I worked with
24 him in good faith, and he came to his
25 office and locked himself into a room and

Page 218

1 J. SIMPSON
2 wouldn't talk to anyone, then claimed he
3 had COVID, yes, all on the record, yes,
4 yes. And then furthermore you can go to
5 the next document we'll talk about the
6 injection and he had no bond and no appeal.
7 Let's go to those next. No bond and no
8 appeal for his band acts.

9 Q. In fact, you're reading my
10 mind, Mr. Simpson --

11 A. Let's go. I'm ready. Come on.
12 Show me. Let's get it all on the record
13 because this does not have a date. It has
14 no date and Cohen read it wrong and he read
15 it right in his transcript and that's
16 indicta. Go ahead, next. But I reminded
17 him in October, and he heard me and said I
18 agree with you, Mr. Simpson. Three times I
19 have on the record he agreed. 2021.

20 Q. You sought to have Judge Cohen
21 investigated; is that correct?

22 A. Absolutely, a hundred percent.

23 Q. Where have --

24 A. Put on the record, the counsel
25 for judicial conduct. It is fully in

Page 219

1 J. SIMPSON

2 process. I confirmed it by letter and got
3 it two weeks ago.

4 Q. You filed a letter --

5 A. CJC, counsel for judicial
6 conduct, that is what you do when you go
7 for a bad Judge. It's on the record.

8 Q. So you filed a formal complaint
9 against Judge Cohen?

10 A. Yes, yes. For bias, a hundred
11 percent.

12 Q. Two weeks ago?

13 A. No. I filed it in November.
14 It takes time.

15 Q. November 2024?

16 A. Yeah. It's in full process.
17 He knows. He's aware.

18 Q. So what happened -- how do you
19 know he's aware?

20 A. I told him to his face. I'm
21 not scared of anything --

22 Q. When did you tell him?

23 A. I told him on the record.

24 MR. LORENC: Objection. I
25 think we're outside the scope.

Page 220

1 J. SIMPSON

2 A. By the way, I have a letter
3 confirms we're still in process.

4 MR. LORENCE: Jeff, stop
5 talking.

6 Q. Have you made complaints of the
7 FBI about Judge Cohen or anybody else?

8 MR. LORENCE: Objection. We're
9 outside the scope of Motion 17.

10 MR. SCHWARTZ: I don't think
11 that's outside the scope of Motion
12 17.

13 MR. LORENCE: Why so?

14 MR. SCHWARTZ: Because I think
15 that this indicates that Mr. Simpson
16 is a danger to Mr. Chassen and the
17 properties.

18 A. No. Actually bring justice.

19 MR. LORENCE: Jeff, stop
20 talking. By virtue of making a
21 complaint.

22 MR. SCHWARTZ: Erratic
23 behavior.

24 A. Jared stole my car. Jared
25 stole money.

Page 221

1 J. SIMPSON

2 MR. SCHWARTZ: If you're going
3 to direct him to not answer the
4 question --

5 MR. LORENCE: I'm trying to
6 understand the question better. So
7 am I to understand that erratic
8 behavior in your opinion is him
9 pursuing complaints to federal
10 authorities and administrative
11 oversight agencies?

12 MR. SCHWARTZ: Our argument
13 would be that in this case it is,
14 yeah.

15 A. Judge Cohen told him he's
16 wrong --

17 MR. LORENCE: Stop talking.

18 Okay. Go.

19 A. Cohen told him it's not. Cohen
20 told him, he tried to say my hands weren't
21 clean. And Cohen on the record, he said
22 Simpson is allowed to go wherever he wants.
23 He already told him that.

24 MR. LORENCE: Okay.

25 Q. So you have made complaints to

Page 222

1 J. SIMPSON

2 the FBI about Judge Cohen or others in this
3 case?

4 A. I have made complaints to the
5 FBI that Thorne and your client have done.
6 I've told you multiple times, absolutely,
7 theft, collusion, absolutely. Of hundreds
8 of millions of circumventing moneys,
9 hundreds of millions, absolutely, yes.

10 Q. And you sent these in writing,
11 is there written complaints you made?

12 A. You're copied on the emails.
13 Do you not see that?

14 Q. Are those the only
15 communications you've had with the FBI?

16 A. I don't know. I'm not sure,
17 but I don't have to disclose that to you.
18 Ask the FBI for a warrant.

19 Q. Actually, you do because I'm
20 asking the question.

21 A. Ask the FBI for a warrant.

22 Q. Actually, you do have to
23 disclose it to me. I'm asking you the
24 question.

25 A. It's not a free for all.

Page 223

1 J. SIMPSON

2 Q. It's a relevant question.

3 MR. LORENCE: You have to answer
4 his question.

5 A. The answer is, I've had
6 multiple communications with them about the
7 acts that you've done. Absolutely. I
8 don't think you want to see what I'm
9 disclosed to them. I don't care you want
10 to see.

11 Q. No. We actually want to see --
12 Mr. Chassen does want to see --

13 MR. LORENCE: Stop volunteering
14 information, please.

15 Q. Mr. Chassen does want to see
16 what you disclose?

17 A. We'll decide, okay.

18 Q. What other agencies have you
19 made complaints about Judge Cohen or the
20 other litigants?

21 A. It's not Judge Cohen. I did
22 not call the FBI on Judge Cohen. I called
23 the FBI on you, your clients, meaning your
24 collective clients in the collusion of
25 theft they had of Arch, JJ Arch and its

Page 224

1 J. SIMPSON

2 assets, right, and my civil rights, which
3 have been breached. And I've gone to the
4 Department of Justice on these things,
5 absolutely.

6 Q. What have they told you at
7 department of Justin?

8 A. They don't do that. You make
9 complaints. You file it. They don't call
10 you until they're ready to. You're
11 laughing, Ms. Thorne. You think it's
12 funny. Your name is all over it. You've
13 lied to this Court. You've lied and lied
14 and lied, so you think it's funny. It
15 won't be funny. What are you going to say
16 you lied because you did. So did Kevin
17 Wiener.

18 MR. LORENC: Jeff.

19 A. It's not actually funny in your
20 investigated. I have nothing to hide,
21 zero. You do.

22 MR. LORENC: Stop volunteering
23 information when no question is
24 posed, please.

25 A. Anyway.

Page 225

1 J. SIMPSON

2 Q. Mr. Simpson, I'm going to show
3 you another document and bear with me for
4 one second. It's being marked C7. It's
5 going to show up as Exhibit 8 on the
6 screen. If you can take a moment to review
7 it.

8 A. Yup.

9 Q. Is this document a decision and
10 order on Motion Sequence No. 1?

11 A. It says Motion 3. Hold on.
12 I'm reading into it. Hold on. This is
13 Motion 1 at the top and then it says here
14 ordered -- Order to Show Cause, Motion
15 Sequence three. So to be specific, I'm not
16 sure. Looks like one and maybe three. I'm
17 not sure. I would have to look. I don't
18 know.

19 Q. Are you looking what has been
20 marked Exhibit C7 --

21 A. C7. Is this Exhibit 8-7 and
22 the top of it says Motion Sequence 01, and
23 if you read now to the middle of it first
24 page says ordered granted in part and the
25 third part --

Page 226

1 J. SIMPSON

2 (Reporter clarification.)

3 A. In the third paragraph it says
4 an Order to Show Cause --

5 Q. Got it.

6 A. -- entered in Motion Sequence
7 No. 3.

8 Q. You see on the top it says --

9 A. Yes.

10 Q. Motion Sequence No. 001. You
11 see that?

12 A. I do.

13 Q. Okay. And do you see that it
14 refers to -- it refers to plaintiff's
15 motion in the order. It says order that
16 plaintiff's motion; would that be you
17 Mr. Simpson?

18 A. Yes.

19 Q. And do you see that it says it
20 was granted in part.

21 Do you see that?

22 A. I do.

23 Q. And do you see it's granted in
24 part to the extent set forth in the Court's
25 interim order at NYSCEF number 36.

Page 227

1 J. SIMPSON

2 Do you see that?

3 A. Yes, I do.

4 Q. Is that a document I have
5 previously showed you?

6 A. I believe so.

7 Q. So -- and then you see further
8 that it says that it also is -- it's also
9 granted to the extent set forth in the
10 Order to Show Cause entered in Motion
11 Sequence 3. You see that?

12 A. Yes. What's your question?

13 Q. And do you see it says it shall
14 remain in effect until further order of the
15 question.

16 Do you see that?

17 A. Yes. What's your question?

18 Q. Is this an order you obtained,
19 Mr. Simpson --

20 A. Yes.

21 Q. -- this decision on order on
22 motion?

23 A. Yes.

24 Q. You were aware of this order;
25 is that correct?

Page 228

1 J. SIMPSON

2 A. Yes.

3 Q. At all times you were aware of
4 this order?

5 A. Yes. And look at all the
6 exhibits that come with it.

7 Q. And that's all I have --

8 A. All the theft, all the lies,
9 all the cheating, all the stealing and,
10 yes, back and forth. There's no dates that
11 preclude anything. Yes. Yes.

12 Q. Okay. Mr. Simpson. I'm going
13 to show you another document.

14 A. Please do. We're going to get
15 to the one right after this where you show
16 how he asks for a bond for all the --

17 MR. LORENC: Jeff, stop.

18 There's no question posed. Nothing
19 to volunteer, please.

20 Q. I'm going to show you what's
21 been marked Exhibit C8. It's going to show
22 up on your screen as 9 momentarily I hope.

23 (Whereupon, Exhibit C8 Order to
24 Show Cause was marked for
25 identification as of this date.)

Page 229

1 J. SIMPSON

2 A. I'm waiting for it to load. I
3 have 8-7 is that what you're looking at.

4 Q. Exhibit 9-10.

5 A. Not yet. C8, 2/11?

6 Q. It's been marked Exhibit C8,
7 correct.

8 A. What's your question?

9 Q. Do you recognize this document?

10 A. Yeah.

11 Q. And you recognize this document
12 to be an Order to Show Cause?

13 A. Yes.

14 Q. And do you see that this Order
15 to Show Cause appears to be signed by the
16 Honorable Joel M. Cohen.

17 Do you see that?

18 A. Yes. I also see that it
19 says --

20 Q. I just asked --

21 A. Contempt was considered
22 withdrawn. Yes. I know exactly what it
23 says.

24 Q. Do you see the sign by Judge
25 Cohen? Do you see that?

Page 230

1 J. SIMPSON

2 A. I do. It also asked talks
3 about contempt here which you asked him to
4 sign then he withdrew it later, but go
5 ahead.

6 Q. And do you see where it says
7 sufficient cause -- on the second page of
8 the order, it says sufficient cause,
9 therefore, having been alleged it is,
10 quote, it is ordered that pending the
11 hearing of this motion, Simpson shall
12 reinstate Chassen.

13 Do you see that?

14 A. I did.

15 Q. And do you see that it says
16 neither Simpson nor Chassen shall purport
17 to terminate shall purport to terminate or
18 resign the other from membership of the
19 company without core permission.

20 Do you see that?

21 A. Yeah.

22 Q. And do you further see that
23 Simpson shall restore Chassen's full access
24 to all of his company email accounts and to
25 all company information systems.

Page 231

1 J. SIMPSON

2 Do you see that?

3 A. Yeah.

4 Q. And do you see that it says
5 Simpson shall ensure that Chassen has
6 online viewing access of all company bank
7 accounts.

8 Do you see that?

9 A. I do. Do you go the email --
10 you just got an email from the bank. Look
11 at it. Read it.

12 MR. LORENC: Jeff.

13 Q. Do you see it then says neither
14 did Simpson nor Chassen shall review
15 without permission or authorize each
16 other's to review without permission each
17 other's private emails unless they are
18 provided during discovery.

19 Do you see that?

20 A. Mm-hmm.

21 Q. And do you see that it also
22 says Simpson and Chassen shall cooperate in
23 good faith to ensure that each of them have
24 authorization from applicable banks to
25 execute company bank transactions which

Page 232

1 J. SIMPSON
2 transactions remain subject to the terms of
3 the applicable operating agreements.

4 Do you see that, Mr. Simpson?

5 A. Applicable operating
6 agreements, yes.

7 Q. And do you see that it says:
8 The court's order regarding interim
9 operating procedures, NYSCEF 36, remains in
10 full force and effect?

11 A. I do. What's your point?

12 Q. Mr. Simpson, were you aware of
13 this order along with the other orders?

14 A. Yes. What's your point?

15 What's your question? What's your
16 question? Absolutely.

17 Q. Were you aware of this order?

18 A. Absolutely.

19 Q. Were you aware of the
20 provisions in the order?

21 A. Absolutely. And I know what
22 they mean and you don't, clearly. Let's go
23 to the contempt motion. Let's do that next
24 where you can see there was no contempt.
25 Let's look at the second firing which

Page 233

1 J. SIMPSON

2 happened before this, right, and the Judge
3 says he made a mistake. Go ahead. Next.

4 MR. LORENC: Jeff. Don't
5 volunteer information, please.

6 A. I've already said it. They
7 know. It's just a game.

8 Q. Okay. Bear with me one second.

9 I'm going to show you what's
10 going to be marked as Exhibit C9. It
11 should be at the top of your careen as
12 Exhibit 10.

13 (Whereupon, Exhibit C9 Order
14 Regarding Measures During the
15 Pendency of the Order to Show Cause
16 Regarding the Appointment of Receiver
17 for JJ Arch was marked for
18 identification as of this date.)

19 A. Yes.

20 Q. Do you see this document?

21 A. Yeah.

22 Q. Do you recognize this document?

23 A. Yes.

24 Q. Is this document -- is it
25 entitled interim Order Regarding Measures

Page 234

1 J. SIMPSON

2 During the Pendency of the Order to Show
3 Cause Regarding --

4 A. Yes.

5 Q. -- the Appointment of Receiver
6 for JJ Arch, yes?

7 A. Hold on. Hold on. Let's be
8 clear. Let's be clear.

9 MR. LORENC: Before you say
10 anything, I don't have the document.

11 MR. SCHWARTZ: It's at the top.

12 It came out at the top.

13 A. Just to be clear, Robert, the
14 title, it says Exhibit 10-8, dash, Oak TRO,
15 Oak TRO. Claims to be part of this whole
16 shebang, but they're here. Go ahead.

17 Q. If I can point your attention
18 to Footnote 3 of this order.

19 Can you take a look at that?

20 A. Yeah, yes.

21 Q. Do you see where it says:
22 Contrary to the position taken by Simpson
23 and AREH in connection with this motion,
24 the Court finds that the major decision
25 consent rates contained in the AREH LLC

Page 235

1 J. SIMPSON

2 agreement with respect to bankruptcy
3 actions are enforceable.

4 Do you see that?

5 A. Yes. AREH was not put into
6 bankruptcy, next.

7 Q. But do you see that the Court
8 found that the AREH LLC consent rights
9 included bankruptcy in --

10 A. I see it. It's contrary to
11 what Judge Carter said just three days
12 before, which this is nonconstitutional.
13 This is against constitution to do what he
14 did here. States aren't allowed to do
15 this. So it's dead wrong. We had Judge
16 Carter on the right path, but these guys
17 pulled the plug on that. But no, I still
18 didn't file bankruptcy of AREH regardless.

19 Q. But you see Judge Cohen found
20 that the consent rights for decision in the
21 AREH operating in --

22 A. For AREH -- what is your point,
23 I never filed AREH.

24 Q. No, you did not file --

25 A. No, I did not file AREH.

Page 236

1 J. SIMPSON

2 Q. You filed for JJ Arch.

3 A. Oh, bring Oak in.

4 Q. We'll examine the differences
5 between those --

6 A. It's different. It's very
7 different. It's AREH solely.

8 Q. You were aware of this order?

9 A. Yes. And I'm aware of what
10 Carter did and you guys pulled the plug on
11 it days before. We should ask Judge Carter
12 about that. Pull the plug. Because Carter
13 didn't actually agree with this. Do you
14 remember that? Because I do. Carter said
15 anyone can file bankruptcy. The bankruptcy
16 Court will decide. So Cohen's got it
17 wrong. It's a constitutional issue.

18 Q. But you were aware of --

19 A. I'm well aware, and I followed
20 it. I didn't file the AREH. If you think
21 I filed AREH, show me where I did because I
22 didn't. By the way it says the Court will
23 of course --

24 Q. There's no question pending,
25 Mr. Simpson.

Page 237

1 J. SIMPSON

2 A. No. There is a question
3 pending. You wanted a question, but you
4 just tried to shut me off because you don't
5 want to hear what I'm going to say. It
6 says due considerations to any decisions,
7 you said it's all tied to consent; but
8 Judge Cohen the Court will give, of course,
9 give due consideration to any decision
10 rendered on this issue and related pending
11 lawsuit by Oak that was removed to the
12 United States Court for Southern District
13 of New York and it does 608941 NJ Inc.
14 versus Simpson and it says US District
15 Court SDNY --

16 Q. But, Mr. Simpson, there was no
17 subsequent order from Southern District?

18 A. Let me finish so she can write
19 the numbers because you pulled the plug
20 Leslie Thorne, it's really funny. You want
21 to go tell Judge Carter what you did? You
22 think Judge Carter will like you for
23 pulling the plug you did? You lost and
24 that's a sore loser laugh. He told you
25 exactly what was constitutional. No

Page 238

1 J. SIMPSON

2 lawyers would ever do such a thing that
3 I've ever heard. To pull the plug the way
4 you did.

5 23-CV-8966 Carter J2023 which
6 Carter said in a hearing that the parties
7 would agree in good faith and you,
8 Mr. Schwartz and Ms. Thorne both told Judge
9 Carter, the Honorable Carter, that you in
10 good faith negotiate with within a week to
11 come back to his Court. You gave him your
12 word, not you, personally, but a guy who
13 works with you did and guess what you did?
14 You pulled the plug out because discovery
15 would be required because you don't want to
16 give discovery. But we'll deal with that
17 this afternoon with Robert. Next.

18 Q. We'll show you what's going to
19 be marked Exhibit C10. It's going to show
20 up on the screen as 11, but it's C10. It's
21 Exhibit 11 on the screen and marked C10.

22 (Whereupon, Exhibit C10 email
23 to Judge Kaplan was marked for
24 identification as of this date.)

25 Q. Do you see that?

Page 239

1 J. SIMPSON

2 A. I do.

3 Q. Do you recognize this document?

4 A. I do. And I was also told
5 subsequent to this document it should not
6 be made public. Administrative Judge
7 should not have done it.

8 Q. What is this document?

9 A. This is me going to the
10 administrative judge and telling them that
11 Judge Cohen's wrong, which he is wrong.

12 Q. And do you complain in this
13 document that Judge Cohen blocked
14 bankruptcy?

15 A. For AREH, for AREH solely it
16 does not say JJ Arch.

17 Q. But you complain that he
18 blocked bankruptcy; is that a -

19 A. For AREH, correct.

20 Q. Okay.

21 A. Solely AREH. Let's not change
22 it to something different than what it is.

23 Q. And when did you send this
24 document?

25 A. I don't know. Let me look.

Page 240

1 J. SIMPSON

2 February 12th, 2024.

3 Q. And were you already thinking
4 about putting JJ Arch into LLC into
5 bankruptcy --

6 A. Arch was supposed to be in May
7 the year before --

8 Q. Were you already thinking
9 about --

10 A. Arch, Arch. Everything should
11 be in bankruptcy -- when her client shit
12 the bed and didn't fund obligations, we had
13 \$25 million in unpaid balances. Jared
14 didn't like when he hired --

15 (Reporter clarification.)

16 A. Jared didn't like that when we
17 hired Len Breslow, an attorney for JJ Arch,
18 who told us when you're out of money and
19 your company has \$25 million of payables --
20 keep smiling -- your guarantor isn't paying
21 the bills because the guarantor was not
22 willing to pay the bills. We can call
23 about capital calls all day long, Thorne,
24 okay. Yeah, no, you lied to the Court
25 about that too.

Page 241

1 J. SIMPSON

2 When they don't want to pay the
3 bills, right, it was simple. Any lawyer
4 looking at it said to me, you have two
5 choices, three choices. One, dissolution,
6 which we already commenced regardless of
7 what you think. We signed an agreement,
8 which means dissolution, you couldn't do
9 anything else because managing members is
10 me to dissolution and your client agreed.
11 So that was one.

12 Two was filing a bankruptcy,
13 which every lawyer I spoke to said
14 absolutely, you got to do it, because these
15 guys are ruining everything as you have
16 done, right, those are really the two
17 options left or find a new partner, which
18 we were trying to do. But guess what
19 happened? Jared and the Oak folks were
20 going behind my back against the AREH
21 agreement and they ran behind my back and
22 were literally soliciting things in Jared's
23 cousin's office, happened early July,
24 improper. They literally said not tell
25 Jeff. Michael Wiener was at the meeting.

Page 242

1 J. SIMPSON

2 (Reporter clarification.)

3 A. Michael Wiener attended a
4 meeting in early July and circumvented me.
5 They all circumvented me, and they didn't
6 have right to do that. So raising money
7 was hard. So those are the only choices
8 left, Schwartz. That was it, okay.

9 Q. Mr. Simpson, you were already
10 contemplating --

11 A. AREH bankruptcy in May.

12 Q. JJ Arch --

13 A. I was considering AREH in May
14 and June because I was responsible as
15 managing member via JJ Arch, its 80 percent
16 owner, and I considered all options as a
17 fiduciary responsible for all partes.

18 Q. Okay. Let's go on.

19 A. Please. Give me something of
20 relevance here. This is nonsense, and this
21 is not supposed to be public by the way.
22 The fact Judge Kaplan did this, I've been
23 told by the courts she's not supposed to
24 send something publicly.

25 Q. Have you initiated a complaint

Page 243

1 J. SIMPSON

2 against her with the judicial conduct
3 committee?

4 MR. LORENC: Objection.

5 Relevance. Outside the scope. Let's
6 move on.

7 A. Makes complaint against the bar
8 to you. Next.

9 Q. I'm showing you what's been
10 marked as Exhibit C11. It's going to show
11 up on your screen as Exhibit 12.

12 (Whereupon, Exhibit C11
13 Decision and Order on Motion 3 was
14 marked for identification as of this
15 date.)

16 A. Yeah.

17 Q. Do you recognize this document?

18 A. Yeah. Denied for contempt.

19 Q. Yeah.

20 A. What else?

21 Q. So you're aware of this
22 document?

23 A. I have to look at it more
24 carefully. This is Motion 3, (perusing).
25 The Chassen motion for contempt is denied.

Page 244

1 J. SIMPSON

2 What do you want to hear? What are you
3 asking me about?

4 Q. I'm asking you, you're aware of
5 this document, right?

6 A. I'm aware of it.

7 Q. And you were aware when it was
8 entered, correct?

9 A. What's your point?

10 Q. I'm asking you if you were.

11 A. I'm aware of it, yeah, what's
12 your point?

13 Q. You're aware of when it was
14 entered, correct?

15 A. Yeah. I didn't resign him. He
16 did it himself. He worked for Oak.

17 Q. You see where it says ordered
18 that Defendant Chassen's motion for
19 preliminary injunction is granted in the
20 following respects.

21 Do you see that?

22 A. Yeah.

23 Q. And you see that it says, one,
24 Simpson, September 1st, 2023, purported
25 termination letter to Chassen is void?

Page 245

1 J. SIMPSON

2 A. Yeah.

3 Q. And shall take no affect.

4 You see that?

5 A. Yeah.

6 Q. And you were aware of that at
7 that time, right, the Court did that,
8 right?

9 A. Well, no. Actually, I'm not.
10 I have to think about that. That doesn't
11 make sense logically. I have to think
12 about that.

13 Q. So you didn't know about this
14 order?

15 A. You think I remember every word
16 of this? You spent all day yesterday
17 instead of negotiating in good faith with
18 us like you said you would. You spent all
19 day yesterday preparing for this. I didn't
20 spend all day yesterday preparing for it.
21 You did. I did not. This one I don't know
22 off the top of my head. I have to read it
23 nor carefully. So you'll have to wait a
24 minute, and I'll read it carefully.

25 Oh, yeah, look at the date.

Page 246

1 J. SIMPSON

2 This was ordered look at the date. The
3 date was November. This is in November
4 referencing -- go back in rearview mirror.
5 This is not at all what you're suggesting.
6 I don't know what your point is. Keep
7 going.

8 Q. Were you aware of this order at
9 the time it was entered?

10 A. I'm aware of the ordering
11 concept. I have to read every word
12 carefully because I don't remember off the
13 top of my head, but I'm aware that he
14 denied the contempt.

15 Q. And you're also aware he
16 granted Mr. Chassen's preliminary --

17 A. I'm not sure about that.

18 Q. So you did not know that he
19 granted it in part before?

20 A. I have to look at the words.
21 I'm not a lawyer, number one. Number two,
22 I have to read every word --

23 Q. You were represented by counsel
24 at this time, no?

25 A. And they're not here right now,

Page 247

1 J. SIMPSON
2 are they? So why don't you give me five
3 seconds to look at it? Who are you to
4 force my hand and tell me I should
5 understand this is in ten seconds or less.
6 I don't know the answer. I don't know the
7 answer. I don't know. I have to study it.

8 Q. I'm --

9 A. I know a lot. This I don't
10 know.

11 Q. I'm not asking about your
12 understanding. I'm asking about your
13 awareness.

14 A. I'm not sure I'm aware of what
15 it says without reading it; so, no, I can't
16 give you the answer, yes that you want.

17 Q. So take a second to read it,
18 and then answer me if you are aware of this
19 order.

20 A. Yes. What's your question?

21 Q. Were you aware of this order --

22 A. What's your question? I didn't
23 fire him afterwards. What's your question?

24 Q. Were you aware of this order
25 when it was entered by the Court?

Page 248

1 J. SIMPSON

2 A. Yes. What's your question?

3 Q. Answer the --

4 A. I said yes four times. Listen.

5 Q. Do you see that it says Simpson
6 and Chassen are enjoined from unilaterally
7 seeking to force --

8 A. I did not terminate.

9 Q. -- without permission of Court.

10 Do you see that?

11 A. I did not terminate him
12 afterwards. He did it to himself. He went
13 to work for Oak and Leslie Thorne admitted
14 to the Court she paid him. So he did it
15 himself as we told you in the bankruptcy
16 Court.

17 Q. And do you see, Mr. Simpson,
18 where it says --

19 A. At --

20 Q. Simpson and Chassen shall
21 cooperate in good faith to ensure that each
22 of them have authorization --

23 A. Didn't cooperate shit.

24 Q. Do you see, Mr. Simpson, where
25 it says: Simpson and Chassen shall

Page 249

1 J. SIMPSON
2 cooperate in good faith to ensure that each
3 of them have authorizations from applicable
4 banks to execute JJR's bank transactions
5 which transactions remain subject to the
6 terms and restrictions of the applicable
7 operating agreements.

8 A. Reread the last part of the
9 sentence again. Subject to terms of
10 restrictions.

11 Q. Do you see that?

12 A. Do you see the last sentence?

13 Q. Yes. You're not asking the
14 questions. I am.

15 A. Operating agreement. Yeah,
16 okay.

17 Q. Do you see it signed by Judge
18 Joel Cohen?

19 A. I see who signed it; and I see
20 what he signed, yes. And I still feel I
21 haven't broken the order. Go ahead. Next.

22 Q. Do you see the date 11/22/2023?

23 A. Yeah.

24 Q. And you were aware --

25 A. For what, what, what, what

Page 250

1 J. SIMPSON

2 Allen, what? Speak. Speak. Instead of
3 trying to play games. What do you want?

4 Q. Mr. Simpson --

5 A. Are you aware that Ms. Thorne
6 told the Judge that she paid -- her client
7 paid Chassen. Are you aware of that?

8 Yeah. Okay. That's resignation, not by
9 me. By himself.

10 Q. Mr. Simpson, I'm going to show
11 you another document --

12 A. Go ahead.

13 Q. We're going to mark this
14 document as Exhibit C12. It's going to
15 show up on your screen --

16 A. Go ahead.

17 Q. -- as C11.

18 (Whereupon, Exhibit C12 Order
19 signed by Judge Joel M. Cohen was
20 marked for identification as of this
21 date.)

22 A. Isn't it the same thing?

23 Q. Okay.

24 A. This is the same as the last
25 one. This is the same thing. 12-11. 13?

Page 251

1 J. SIMPSON

2 Q. The Exhibit 13, yes.

3 A. What's your question?

4 Q. Do you see this Order is signed
5 by a Judge Joel M. Cohen?

6 A. I do. But I also see -- yeah.

7 A. What's your question?

8 Q. And you see it's dated

9 11/22/2023?

10 A. Yes. What's your question?

11 Q. Were you aware of this order at
12 the time it was entered?

13 A. Yes.

14 Q. And does this order say that
15 Jeffrey Simpson and JJ Arch are enjoined
16 from acting as or holding themselves out to
17 be to third parties to be managing members
18 of Arch Real Estate Holdings LLC?

19 A. I didn't do that. No one
20 else --

21 Q. You were a --

22 A. I'm aware we didn't do that, so
23 I don't know why you think we did. I would
24 love for you to show me where we did.

25 Q. And are you aware in Section 2

Page 252

1 J. SIMPSON

2 where it says you are enjoined from denying
3 prompt consent to any major decision
4 proposed by Oak as managing member --

5 A. Yeah.

6 Q. -- under Section 7.13 of --

7 A. Keep reading. Keep reading.

8 Yeah, keep going. Both JJ Arch, Jeffrey
9 and Jared.

10 Q. -- joined the --

11 A. Which Thorne told the Judge she
12 hasn't given me shit, she hasn't given me
13 anything, single document ever. And the
14 Judge says, why not? Ms. Thorne says well
15 you know, your Honor, Mr. Simpson. So,
16 yeah, you broke the Court Order, yes.

17 Q. You see it also says there,
18 alternatively, either JJ Arch member --

19 A. It doesn't matter. That's
20 breaking the Court Order.

21 Q. You see that, right? You do
22 see that, right?

23 A. Do you see where this is only
24 the operating company and it's not the
25 investment company, because it's only the

Page 253

1 J. SIMPSON
2 operating company. Go ahead, next. This
3 is only for the nonmanaging member, not
4 member manager. It doesn't give him the
5 right to give me anything. But go ahead.

6 Q. You were aware of this order
7 when it was --

8 A. I'm aware of it, but it doesn't
9 deal with the investment members, not
10 managing member. Go ahead. I don't see
11 Arch Property Holdings 1.

12 MR. LORENC: Are you going to
13 another exhibit because I just got
14 frozen out.

15 Q. I'll show you what's been
16 marked as Exhibit C13 and it's showing up
17 as Exhibit 14 on the document.

18 (Whereupon, Exhibit C13 Order
19 to Show Cause was marked for
20 identification as of this date.)

21 A. What's your question?

22 Q. So have you been able to look
23 at this document?

24 A. Yeah. This is you asking for
25 the temporary receiver, but where is your

Page 254

1 J. SIMPSON

2 withdrawal that came right after this?

3 You're not going to show that today, would
4 you? Why would you?

5 MR. LORENCE: Stop volunteering
6 information, please.

7 Q. Mr. Simpson, you were aware of
8 this document when it was entered by --

9 A. I'm aware.

10 Q. And do you see that it says
11 ordered that pending the hearing -- in the
12 second part of the order it says: Order,
13 pending the hearing of this motion, Simpson
14 shall ensure and continue to ensure that
15 Chassen is provided with online viewing
16 access for all bank accounts of JJ Arch and
17 the JJ Arch controlled entities.

18 Do you see that?

19 A. Yes. And I've done that.

20 Q. And you were aware of that?

21 A. And I've done that.

22 Q. Okay. And do you see where it
23 says in Section 2 and continue to
24 provide --

25 A. No, no. You skipped a section.

Page 255

1 J. SIMPSON

2 Q. I doesn't --

3 A. No. It says -- of JJ Arch
4 operating agreement as amended --
5 unreasonably withheld which you have done.
6 Yes. Yes. No, because you're trying to
7 accuse me.

8 MR. SCHWARTZ: Move to strike
9 as non-responsive.

10 A. Next. Next. Gamey.

11 Q. Two, provide and continue to
12 provide Chassen with a JJ Arch and JJ Arch
13 controlled entities books and records under
14 the process detailed in articles --

15 A. He has what I have --

16 Q. -- operating agreement?

17 You were aware of that you
18 saw --

19 A. He has what I have, next.

20 Q. But you were aware of this?

21 A. Yes. He has what I have.

22 Q. You were aware of this order?

23 A. He doesn't have anything
24 different than what I have. Yes. I've
25 told you ten times. He has what I have. I

Page 256

1 J. SIMPSON
2 have nothing he doesn't have. Citizens
3 just told you. Read your email. Citizens
4 just told you it was an error on their side
5 and they're the ones who didn't provide him
6 access. You just got an email on it five
7 seconds ago. Go look.

8 Q. I'm showing you what's been --

9 A. It also says making
10 distributions I'm allowed to do
11 something --

12 Q. I'm going to show what's been
13 marked as Exhibit C14.

14 (Whereupon, Exhibit C14 email
15 with letter dated February 29th,
16 2024, was marked for identification
17 as of this date.)

18 A. Go ahead. Keep going.
19 Everything piecemeal with you. To be cute.

20 Q. And it's showing up as
21 Exhibit 15.

22 A. And, again, I give him whatever
23 I have, next.

24 Q. You see this document, this
25 email, and then there's a letter attached

Page 257

1 J. SIMPSON

2 to it?

3 A. Exhibit 15?

4 Q. C14. And it's Exhibit 15 --

5 A. C14 where it says here Steve
6 attached, yeah.

7 Q. And you see this letter?

8 A. Yeah.

9 Q. You see it is dated
10 February 29th, 2024?

11 A. What's your question?

12 Q. Have you ever seen this letter
13 before?

14 A. I have to read it. I don't
15 remember.

16 Q. Take a minute to look at it.

17 A. What do you want to know?

18 Q. Take a minute to look at it.

19 A. Steve Altman responded to you
20 here, half baked responded to you in a
21 separate letter. He responded to you that
22 I gave you access which you're ignoring
23 here.

24 Q. Mr. Simpson -- that's not the
25 question posed to you.

Page 258

1 J. SIMPSON

2 A. It's all leading and
3 disgusting. The question is, yes, this was
4 here and there's a follow-up letter --

5 Q. Did you see this letter before?

6 A. I see the letter. I don't
7 remember it, but I do remember there was a
8 response to the letter that said that we
9 gave you access. So move on, next.

10 Q. Let's go to the books and
11 records under page two where it discusses
12 books and records?

13 A. He has what I have.

14 Q. Do you see where it says number
15 one, it requests all books and --

16 A. Again, I have all this stuff.
17 Whatever I have he has.

18 Q. Mr. Simpson, you're not being
19 responsive to my questions, okay?

20 A. I am being responsive. This is
21 your time. Go for it.

22 MR. LORENC: Jeff, you have to
23 let him pose a question, please.

24 A. Keep spewing.

25 Q. You see where it says: All

Page 259

1 J. SIMPSON
2 books of accounts for JJ Arch and each of
3 the JJ Arch controlled entities that you
4 see where it makes that request in number
5 one?

6 A. I do.

7 Q. Did you provide all books of
8 account for JJ Arch in each of the--

9 A. Yes. Everything I have.

10 Q. When did you do that?

11 A. He has continued access through
12 our Dropbox. He has the same access that
13 I've had since the very beginning. He has.
14 Nothing's changed. Other than what Oak
15 took away from us, he has what I have.
16 Nothings changed. You can ask questions
17 any time specifically. Your generalities
18 don't work.

19 Q. He has the same access to
20 payroll accounts that Rever Motors that you
21 have?

22 A. That's not specifically here.
23 Doesn't say payroll accounts.

24 Q. You said he has access to
25 everything you have.

Page 260

1 J. SIMPSON

2 A. He has access to the things
3 that are related here that I have. The
4 things here are by books and records that
5 are asked for. He's not entitled to more
6 than that. He's entitled to pursuant to
7 this he was given the things that he asked
8 for. That's it.

9 Q. What about copies of all
10 QuickBook accounting logs for --

11 A. He had access the same access I
12 got. Oak gave me the QuickBook logs. They
13 didn't work.

14 Q. So does he have the QuickBooks
15 for Rever Motors? Did you provide that for
16 him?

17 A. When I got it, he got it. It
18 was given to us same time. The access was
19 given by an electronic thing by someone
20 over at Oak, and I said it didn't work; and
21 I raised my hand with him about issues I
22 had with QuickBooks and they could care
23 less. It's not my problem; so yeah, you
24 can talk to your friends with Oak over
25 there. I'm not a QuickBooks expert.

Page 261

1 J. SIMPSON

2 Q. Did you give him a copy of all
3 documents from the AREH software --

4 A. He had access to it. He had
5 access from the beginning I've never taken
6 him off of it. I've never taken him off of
7 it. If he had an issue with it -- I've
8 never gotten an email saying he doesn't
9 have it.

10 Q. Did you provide any specific
11 books and records after he received this
12 letter from --

13 A. Yes, I did. Pursuant to the
14 bankruptcy when we were asked for discovery
15 and you were asked for discovery and you
16 agreed, again, to doing something on the
17 11th hour, you pulled the plug and we gave
18 full discovery through Andrew Ritter and
19 through Jason Avi, I think Steve Altman was
20 involved too. And you guys all pulled the
21 plug and you withdrew the motions through
22 the bankruptcy because you have to give
23 discovery. Why would you guys ever tell
24 the truth? So we gave discovery. You
25 didn't.

Page 262

1 J. SIMPSON

2 This is -- Robert, I showed
3 this to you. This was I would say sometime
4 in March or April where Judge "Wis-tan-doh"
5 ordered discovery of Jared Chassen and
6 potentially Wiener and we agreed on a
7 schedule and on the 11th hour, you pulled
8 the plus. You didn't provide anything, and
9 I provided full discovery to you guys. I
10 think Mr. Lorenc has a copy of it, but it's
11 public. Yes, I did give you books and
12 records. And I gave you full discovery on
13 it. You didn't give me any discovery. Go
14 to the bankruptcy and you'll see it.

15 Q. Mr. Simpson, I'm going to show
16 you what's going to be marked as Exhibit
17 C16. It will show up on your screen as 17.

18 (Whereupon, Exhibit C16 March
19 4, 2024, email was marked for
20 identification as of this date.)

21 Q. Have you been able to open this
22 document?

23 A. I'm trying. I'm trying to get
24 to the list. What number is it?

25 Q. It's C16 and it comes up as

Page 263

1 J. SIMPSON

2 Exhibit 17 on the screen.

3 A. Exhibit 17 that's 16.

4 Q. Yeah.

5 A. Okay. I just found it. Okay.

6 Go ahead.

7 Q. Do you recognize this email?

8 A. Yeah. Exactly. This is me
9 giving access to him.

10 Q. You wrote this email?

11 A. Absolutely. I gave him access.

12 Q. So you wrote to him --

13 A. I told him he had access.

14 Q. So you wrote to him that all
15 amazing, Jared, while crafted by attorney
16 if what I sent you was fictitious, call the
17 bank for yourself --

18 A. Yes.

19 Q. Let me ask the question.

20 A. If you feel you need to read it
21 out loud because it makes you feel good, go
22 for it.

23 Q. All amazing Jared, while
24 crafted by attorney if I sent you was
25 fictitious called the bank yourself because

Page 264

1 J. SIMPSON

2 you never --

3 A. Correct.

4 Q. -- I'm sure everybody will
5 testify to that --

6 A. Yes, yes.

7 Q. -- when we put them on the
8 stand. You are lazy and incompetent?

9 A. Yes. All true. A hundred
10 percent, amen. It's who he is. Wait until
11 you see. No one knows what he did for AREH
12 for years. Go ahead. Other than smoke pot
13 with Michael Wiener and have prostitutes.
14 Go ahead.

15 Q. You also wrote so have what
16 you're going to get. If you think you need
17 more go to Court and cry because you are
18 nothing short of useless other than being
19 a --

20 A. He is. And the Judge said he
21 could be a proxy for Oak.

22 Q. You wrote that, right?

23 A. Go ahead. Absolutely. He is
24 that.

25 Q. And then you also wrote I am

Page 265

1 J. SIMPSON

2 done conversing with you. Do not call me.

3 A. Yes.

4 Q. Do not engage with me. I fired
5 you twice for good reasons, and you have
6 resigned multiple times by default by your
7 actions?

8 A. Yeah.

9 Q. You wrote that too?

10 A. Yes, he did. The moment that
11 he was paid for any Oak, he was resigned.
12 That's what it says. It says the on the
13 event it happens, when he works for
14 somebody else, he's done. Why did he go to
15 bankruptcy court? Just three weeks later
16 saying your Honor, I want to work. But I'm
17 scared I'll be fired for working and he
18 says discovery and he says just kidding
19 pull it back.

20 Q. Mr. Simpson, go if you go back
21 to the email before from Mr. Chassen --

22 A. The one you wrote for him?

23 Q. He wrote the Court ordered you,
24 quote, to ensure I have access to these
25 newly opened accounts sending me an email

Page 266

1 J. SIMPSON

2 with possibly fake --

3 A. It's not fake. It's not fake.

4 It's not fake.

5 Q. -- obligation.

6 A. It's not fake. I'll tell you
7 until the cows come home. It's not fake.

8 It was not fake.

9 Q. So in response to that email,
10 you wrote him if you want more, go to Court
11 and cry?

12 A. Yeah. Because he got what I
13 have. There isn't more to give. There
14 isn't more to give. It doesn't exist.
15 Those folks, they stole our whole company.
16 He participated and gave it to them. And
17 what did they do, they made everything
18 impossible. They stole my personal stuff.
19 He helped them do it. It is illegal just
20 to be clear. And by the way, if you keep
21 going down here, this is where Jared
22 actually missed what he's doing with
23 Airbnb. Go ahead.

24 MR. LORENC: Jeff.

25 Q. I'm going to be showing you

Page 267

1 J. SIMPSON

2 what's been marked as Exhibit C17. If you
3 can take a minute --

4 A. Latest I have is Exhibit 17-16.

5 Q. It will be there momentarily.

6 I'm just trying to move the exhibit sicker
7 a little bit. Okay. If you can open it,
8 it's Exhibit 18.

9 (Whereupon, Exhibit C17 March
10 7th, 2024, email was marked for
11 identification as of this date.)

12 A. Yes.

13 Q. It's marked as C17?

14 A. Yes.

15 Q. You see this email it's dated
16 March 7th, 2024?

17 A. Mm-hmm.

18 Q. And you see that it's from an
19 email -- it says from Shradha Lama at
20 Citizens Bank?

21 A. Mm-hmm.

22 Q. And it's addressed to you and
23 to Jared Chassen?

24 A. Yeah.

25 Q. You received this email, right?

Page 268

1 J. SIMPSON

2 A. I don't know. It looks like
3 it. I don't remember it.

4 Q. This is your email address,
5 right?

6 A. It is. I have to look at it.
7 I don't remember it. I'm not sure, like,
8 this doesn't -- doesn't ring a bell to me.
9 This one's not what I remember, so I have
10 to check and see I actually got this email.
11 I have to look.

12 Q. But this is your email address?

13 A. It doesn't matter. I may not
14 have gotten it.

15 Q. Your email address
16 Jeff@RNHamptons.com is an email address
17 you --

18 A. Yes. But I don't remember
19 getting this email. I don't remember this
20 email. Others I do. This one I don't. I
21 have to look.

22 Q. You see where it says: Hi,
23 Jeff. I hope you're doing well. Jeff
24 reached out to me and was inquiring --

25 A. Yes.

Page 269

1 J. SIMPSON

2 Q. Jared reached out to me and was
3 inquiring -- excuse me. Jared reached out
4 to me and was inquiring regarding access
5 for 1640 Motors LLC.

6 A. Yeah.

7 Q. Please approve at this email if
8 you want to add him as a signor or want to
9 give him online access?

10 A. There could be. I don't know.

11 Q. There's a question pending.

12 Please don't interrupt.

13 Please approve this email if
14 you would like to add him as a signor or if
15 you want to give him online access. You
16 can use the guidance attached in the
17 previous email to add Jared as a user.
18 Feel free to call me if I have any
19 questions. Best regards, Shradha Lama--

20 A. Excuse me. It says added as a
21 signor. That was never the deal. And he
22 said if you want to give him online access,
23 you can use the guidance, which I did. I
24 gave you a screenshot of it.

25 Q. Mr. Simpson, did you respond

Page 270

1 J. SIMPSON

2 to --

3 A. I don't know if I responded to
4 the email but --

5 Q. She asked you to call. Did you
6 call her?

7 A. I don't remember. We can ask
8 her and I can check my notes if I can find
9 it but I would tell you this. I've shown
10 you countless times I've added him and they
11 wrote you an email today. Read it. The
12 reason he couldn't get access was bank
13 restriction. Just go read it now.

14 Q. Mr. Simpson --

15 A. No, Mr. Simpson. Go read it.
16 It just came in. It just came in.

17 Q. It's not for you to ask me
18 questions --

19 A. If you were a legit person, I
20 would respect you but you're not. You're
21 illegitimate, and you lie about everything.
22 You won't look at the facts. The bank just
23 told you today. The bank told you today
24 with your email but go ahead, next. It's
25 on the record.

Page 271

1 J. SIMPSON

2 Q. This email is from Shradha
3 Lama?

4 A. I responded to it.

5 Q. She asked you to reach out to
6 her. Did you --

7 A. I don't remember. I told you.
8 I don't know. I have to look.

9 Q. This email you see it's dated
10 March 7th?

11 A. I don't remember March 7th.

12 Q. What happened on March th?

13 A. I don't remember.

14 Q. Did anything significant happen
15 on March 7th?

16 A. I don't remember.

17 Q. Was JJ Arch bankruptcy filed on
18 March 7th?

19 A. I don't remember the date.

20 Q. Do you recall talking to Ms.
21 Shradha Lama after March 7th and dismissal
22 of the bankruptcy to try to give Jared
23 access to the bank accounts.

24 Do you recall that?

25 A. What I do recall is not

Page 272

1 J. SIMPSON
2 March 7th, but I do recall I gave him
3 unfettered access that I sent it to him
4 several times. I gave him a username, a
5 password screenshots to you, to every
6 lawyer involved, to show I followed her
7 guidance. And I told I don't have to
8 respond to her. I may have responded to
9 her. I have to check. I don't know.

10 Q. After Mr. Chassen reached out
11 to the bank, did you follow up when she
12 asked --

13 A. I don't remember. I have to
14 look. If I find something, trust me, you
15 will know tonight. I will look for you. I
16 will see if I responded to her. I may
17 have. I don't know.

18 Q. I'm going to go show you what's
19 going to be marked as Exhibit C18. If you
20 can take a look at it, it will show up on
21 your screen as Exhibit 19 even though it's
22 been marked with a sticker as C18.

23 (Whereupon, Exhibit C18 Order
24 to Show Cause for Motion 13 was
25 marked for identification as of this

Page 273

1 J. SIMPSON
2 date.)
3 A. C18, 2/11/25?
4 Q. It is C18 --
5 A. Bottom right corner, 2/11.
6 Q. 2/11/2025, yellow sticker.
7 A. What's your question?
8 Q. Do you recognize this document?
9 A. Order to Show Cause. Hold on.
10 Yeah. Motion 13, yeah. What's your
11 question?
12 Q. So do you see that this is a
13 document that was signed by Judge Joel M.
14 Cohen? Do you see that?
15 A. Bear with me (perusing). Yes
16 but I believe this has been modified since.
17 Q. Do you see --
18 A. I think it's been modified.
19 Q. Do you see it's dated November
20 18th, 2024. Do you see that?
21 A. Something's not right. Yes. I
22 believe this has been amended though.
23 Q. I'm not asking whether it's
24 been amended.
25 A. What's your question?

Page 274

1 J. SIMPSON

2 Q. Do you see that it says in this
3 document that it is an Order to Show
4 Cause --

5 A. Yes. What's your question?

6 Q. Do you see where it says
7 ordered --

8 A. What's your question?

9 Q. I'm asking you do you see where
10 it says ordered --

11 A. What's your question?

12 Q. I'm asking you the question.

13 Do you see where it says
14 ordered that Simpson immediately provide
15 and continue to provide Chassen with, one,
16 complete access to the bank accounts of JJ
17 Arch and its investment entities as defined
18 in the JJ Arch operating agreement.

19 A. He has. Nothings changed.

20 Q. Do you see that?

21 A. Nothings changed. He has what
22 I have. Ask Oak where the stuff is, okay.

23 Q. Why would Oak have --

24 A. Because Oak took over my whole
25 company. They took my Dropbox. They took

Page 275

1 J. SIMPSON

2 everything.

3 Q. Oak runs 1640 Montauk LLC?

4 A. They took over the entire
5 Dropbox. It had it in there.

6 Q. Oak runs 1640 Motors LLC?

7 A. No. But 1640 Motors LLC was by
8 Shradha and Citizens countless times I
9 showed you and read the email from the
10 bank. It was an error on there part this
11 whole time even though I had countless
12 inquiries with them. You read the email.
13 It wasn't solicited by me.

14 Q. You also see in Section 2 of
15 this paragraph, it says: Order that JJ
16 Arch and its -- that Simpson -- strike
17 that.

18 Order that Simpson immediately
19 provided, continue to provide Chassen with
20 JJ Arch and its investment entities books
21 and records as --

22 A. I told you he has what I have.

23 Q. And you also see that it says
24 in three that Simpson immediately provide
25 and continue to provide Chassen with a

Page 276

1 J. SIMPSON
2 complete listing of all transactions at JJ
3 Arch and its investment entities during the
4 pendency of the bankruptcy proceeding?

5 A. He hasn't done any transactions
6 I keep telling you that. Does not qualify.
7 It's not part of this. Rever Motors has
8 nothing to do with it. It doesn't. It's
9 not a real estate transaction. It's not a
10 JJ Arch transaction.

11 Q. It's a transaction?

12 A. It's not. It's not.

13 Q. It's a transaction?

14 A. There's no world in which I
15 would've gotten consent or signed an
16 agreement that says that. I don't agree
17 with you. You show me where it says that.
18 Absolutely not. The business could never
19 have lived and be successful. He already
20 kiboshes everything thanks to you. You
21 think if I had to ask him to go to the
22 bathroom. No chance in this world. No
23 chance. Good luck in that one.

24 Q. But the Court orders --

25 A. It does not say that. We

Page 277

1 J. SIMPSON
2 brought up car transfers many times in
3 front of the Judge and he never said I'm
4 supposed to tell him every time a car is
5 sold. He never said that. Any order
6 doesn't say that and I've told the Judge
7 and the Court that I couldn't as a business
8 operate by asking some of the permission
9 every time I sold the car and he didn't
10 actually say yes or no, there's a problem
11 with it. So show me an order where it says
12 that explicitly. So move on. So far you
13 have got nothing good. I would love to see
14 something good. How much time does he have
15 left?

16 VIDEOGRAPHER: We've been on
17 the record for three hours
18 44 minutes.

19 MR. LORENC: For the record,
20 are you referring that a car is an
21 asset of the company or is a
22 merchandise?

23 MR. SCHWARTZ: A car, a vehicle
24 is an asset of the business.

25 A. And by the way those cars never

Page 278

1 J. SIMPSON
2 actually entered 1640s hands. That's not
3 how it's done. We don't own the cars.
4 It's a process and Jared knows that and has
5 access to it clearly so --

6 Q. I'm showing you what's been
7 marked Exhibit C19, I believe. And it's
8 comes up as 20 on the document.

9 (Whereupon, Exhibit C19
10 November 19th, 2024, email was marked
11 for identification as of this date.)

12 Q. Do you see that?

13 A. I do.

14 Q. You see on the bottom on
15 November 19th, 2024, there's an email from
16 Allen Schwartz. It appears to be directed
17 to you where it says: Please find attached
18 a PDF copy of the Order to Show Cause and
19 supporting affidavits and then it goes on
20 to quote what the Order to Show Cause
21 ordered.

22 Do you see that?

23 A. I see your opinion here, yes.

24 What do you want to know?

25 Q. And so the remaining emails on

Page 279

1 J. SIMPSON

2 this chain, were these emails that were
3 authored by you?

4 A. It appears so. What's your
5 question?

6 Q. So you wrote --

7 A. I did. I said tell me about
8 the member loan. Tell me about the
9 default. Yes. I wrote all those things.

10 Q. You wrote back at 11:54 and
11 added the Honorable Joel M. Cohen's email
12 address to this email. Honorable Joel M.
13 Cohen I see on --

14 A. I did, yes.

15 Q. And what about SFC-part
16 20-clerk?

17 A. That's the administrative
18 Judge. That's right.

19 Q. And what about Eric Szkarlat
20 you added him too?

21 A. He works for Judge, yeah.
22 Thanks to you meeting pro se as a
23 nonlawyer, yes, I did. Because of his
24 attacks and I was pro se.

25 Q. And so do you see where you

Page 280

1 J. SIMPSON

2 say, I say at 1:06 p.m. that I have removed
3 the Court from this email chain and as it
4 is inappropriate --

5 A. I have no respect for you. I
6 don't agree with you. I think you're a
7 lying cheating thief. So, no, you don't
8 tell me what to do and I don't work for you
9 in any way whatsoever. Zero. Earth never
10 worked for you. Just because you tell me
11 you think I'm going to listen to what you
12 say? Come on. Get out of here.

13 Q. The email says Mr. Chassen
14 still does not have access --

15 A. Yeah. And he could call me
16 directly, and he could've asked the bank
17 directly; and I didn't get any follow up
18 from the bank. You love to complain and
19 whine. Yes. That's right. That's right.
20 You like to whine.

21 Q. Did you do anything to get him
22 bank access after this email chain?

23 A. He did not connect with me. He
24 never once asked me directly. You just
25 complain and whine, so it's not something a

Page 281

1 J. SIMPSON

2 Judge -- an attorney would do, right, I
3 gave him access. I connected the person,
4 which you don't have here. Who's the
5 Shradha person. Where is that email?

6 Q. On November 19th, 2024, at
7 9:24 p.m., I write --

8 A. What's your point? For six
9 months you disappeared on this issue. For
10 six months, nine months.

11 Q. I moved the Court D --

12 A. And I put them back.

13 Q. Please do not --

14 A. Again, I don't listen to you.
15 I don't work for you.

16 MR. LORENC: You have to let
17 him pose a question.

18 A. I don't work for you.

19 Q. Do you see where it says
20 Mr. Chassen still --

21 A. I see. And Mr. Chassen was
22 granted by me several times the person to
23 call and if he had an issue, it is of his
24 interest --

25 Q. So at the top of this email

Page 282

1 J. SIMPSON
2 chain here at 10:36 email, this is your
3 email writing back, correct, at 10:36 p.m.
4 on November 19th where you then now we can
5 see again that Eric Szkarlat is back on the
6 email chain?

7 A. Yes. Absolutely.

8 Q. Everybody is --

9 A. Show them how you lied. Yes.

10 Q. You say you have no authority
11 to make any commentary about anything?

12 A. Correct. You don't.

13 Q. He was fired for cause over a
14 year ago?

15 A. It's true.

16 Q. You don't say anywhere here
17 that you're going to try to get Mr. Chassen
18 the bank accounts --

19 A. I gave him a screenshot, I
20 showed you countless times. You can ask
21 the bank if there's ever a time where
22 Jared's name is not shown in the system. I
23 guarantee they tell you no. Go ask them.
24 I dare you to because I never took him off.
25 Not once. Please do it. Ms. Thorne, you

Page 283

1 J. SIMPSON
2 write it down. You can go do it for him
3 since you're working the case. This guy
4 works for you. Chassen can't afford him.
5 Can't wait to see the indemnity.

6 Q. Let's look at another email
7 Mr. Simpson.

8 A. Go ahead. What do you got?

9 Q. I'm showing you what's been
10 marked Exhibit C21 and it will show up as
11 22 on the screen.

12 (Whereupon, Exhibit C21
13 November 19th, 2024, email was marked
14 for identification as of this date.)

15 A. 22-20. What's your question?

16 Q. Do you see here there's an
17 email chain between -- you're on this email
18 chain going back and forth.

19 Do you see that?

20 A. Yeah.

21 Q. And you see on November 19th at
22 5:04 the Court writes from SFC-Part 3 at
23 from NewYorkCourts.gov it writes as
24 follows: The Court should not be copied on
25 this type of correspondence between the

Page 284

1 J. SIMPSON
2 parties, and emails to the Court are under
3 the course rules for logistics and
4 scheduling purposes only. Any substantive
5 correspondence seeking relief from the
6 Court must be filed on NYSCEF.

7 Do you see that?

8 A. Again, I'm not an attorney and
9 the same person that writes it is the same
10 person that writes emails. What do you
11 want me to tell you? Yes, I owe the email
12 what do you want.

13 Q. Does this come --

14 A. Yes, yes. I wrote the email.
15 Yes. Yes. Keep going.

16 Q. You write shortly thereafter I
17 think it's approximately --

18 A. Yeah. And I wrote the Court
19 wasn't biased, so all bets are off when the
20 Courts been biased or paid off by you. One
21 or the other or both.

22 Q. So you were not going to listen
23 to what the Court just said here?

24 A. There's no merits here.
25 There's no merits. My life's been ruined

Page 285

1 J. SIMPSON
2 because of you guy. It's a free for all.
3 I think Kevin is behind all of it or his
4 mother. Jared is not smart enough. You're
5 definitely not smart enough. The term we
6 all call you is the nebbish. Go ahead.

7 Q. Okay.

8 MR. SCHWARTZ: How much time do
9 we have?

10 VIDEOGRAPHER: We've been on
11 the record for three hours and 50
12 minutes.

13 MR. SCHWARTZ: Let's take a
14 five-minute break.

15 VIDEOGRAPHER: Off the record
16 at 15:48. Mark the end of media
17 number three.

18 (Whereupon, a short recess was
19 taken.)

20 VIDEOGRAPHER: On the record at
21 15:59, beginning media unit number
22 four.

23 Q. Mr. Simpson, you sent a
24 termination -- strike that.

25 You sent an email to

Page 286

1 J. SIMPSON

2 Mr. Simpson purporting to terminate him on
3 August 5th, 2023, correct?

4 A. Are you asking me to look at an
5 exhibit?

6 Q. I'm asking you a question.

7 A. Okay. The answer is yes.

8 Absolutely.

9 Q. And you filed that, that's the
10 email that you filed in the case on NYSCEF,
11 New York State Court's electronic filing?

12 A. I did not. An attorney did.

13 Q. An attorney did that on your
14 behalf?

15 A. Yes.

16 Q. Let me see if this is the
17 document you're referring to. I just
18 introduced what's been marked as Exhibit
19 C22. It's Exhibit 23 on the document. On
20 your computer.

21 (Whereupon, Exhibit C22
22 August 5th, 2023, email was marked
23 for identification as of this date.)

24 A. What's blacked out at the top?
25 Go ahead. What's your question?

Page 287

1 J. SIMPSON

2 Q. Is this the email that you sent
3 to Mr. Chassen on August 5th, 2023, in
4 which you purported to terminate him?

5 A. I didn't purport. I had rights
6 to do it. It was done in a bow.

7 Q. So this is the email --

8 A. Yes.

9 Q. -- in which you believe --

10 A. Not I believe. It was done.
11 The problem was that Chassen actually stole
12 any bank account access and actually stole
13 my Internet access and everything that
14 related to Arch. So it became ineffective
15 since he just stole it all. It was in the
16 injunction that you referenced prior, but I
17 didn't know any of it. Go ahead. Oh, I
18 should say Oaks did it with him from what I
19 found later, yes.

20 Q. All right. I want to show you
21 what's going to be marked as Exhibit C23.
22 And, again, this will show up on you're
23 computer as 24.

24 (Whereupon, Exhibit C23
25 Voluntary Petition For

Page 288

1 J. SIMPSON

2 Non-Individual's Filing For
3 Bankruptcy was marked for
4 identification as of this date.)

5 A. I'm waiting for it to load. Go
6 ahead. What's your question?

7 Q. Do you see this document?

8 A. Mm-hmm.

9 Q. Is this the Voluntary Petition
10 For Non-Individual's Filing For Bankruptcy?
11 Is that what the document is entitled at
12 the very top?

13 A. Yes.

14 Q. And is it for -- is the
15 debtor's name JJ Arch LLC?

16 A. Yes.

17 Q. And if you scroll to the bottom
18 of the document, do you see where it says
19 official Form 202 declaration under penalty
20 of perjury for non individual debtors? You
21 see that?

22 A. Not yet. I'm on 201. There's
23 202. Where are you in the document?

24 Q. The very end of the document.

25 A. Very end of this form. Are you

Page 289

1 J. SIMPSON

2 in the form? Where are you?

3 Q. Let me strike that question.

4 Do you recognize this document?

5 A. What's this document? The
6 entire attachment or just the first form.

7 Q. The entire document, do you
8 recognize it Exhibit C23?

9 A. Yes.

10 Q. What do you recognize this
11 document to be?

12 A. JJ Arch filing a bankruptcy.

13 Q. Okay. And so if you go to the
14 end of the document, the end, do you see
15 where it says executed on March 7th, 2024,
16 and then it says slash Jeffrey Simpson?

17 A. I'm seeing where -- okay.

18 Bottom 201, okay, yeah, I see it, yes.

19 Q. So did you authorize or assign
20 this document?

21 A. Yes.

22 Q. Can on March 7th, 2024?

23 A. Absolutely.

24 Q. Okay. And if I can point your
25 attention two pages prior to there in

Page 290

1 J. SIMPSON

2 Footnote No. 2. Well, let me strike that.

3 If I can point your attention
4 two pages prior where it -- there's a
5 document that says: Corporate ownership
6 statement of JJ Arch.

7 Do you see that?

8 A. I'm looking here for it. What
9 number is it in the document?

10 MR. LORENCE: 1315.

11 A. Page number or --

12 MR. LORENCE: If you look at the
13 scroll count in the middle of the
14 bottom --

15 A. I don't have a control count,
16 sorry.

17 Q. We're going three pages
18 backwards from where you signed it at the
19 end of the document.

20 A. So we're 201 and we're, like,
21 near the beginning?

22 Q. So it's a document entitled
23 Corporate Ownership Statement of JJ Arch
24 LLC Pursuant to Federal Rule of Bankruptcy
25 Procedure 1007 A1 and 7000.1 and Local Rule

Page 291

1 J. SIMPSON

2 of Bankruptcy Procedure 1007-3.

3 Do you see that?

4 A. I'm on the wrong document. Let
5 me see.

6 MR. LORENC: This one
7 (indicating).

8 A. Oh. I was in the wrong
9 section. Okay. Yeah.

10 Q. You see where it says: A,
11 ownership of the debtor's equity interest.
12 It says Jeffrey Simpson owns 100 percent of
13 the equity interest in the debtor?

14 A. Yes. As of 4.2D, yes. He was
15 gone. He wiped. Look at it. Pledged.
16 Read it. 4.2D, dead.

17 Q. You see there's a Footnote 2
18 there, right?

19 A. Yeah.

20 Q. And if you go to Footnote 2 it
21 says: As follows, Jared Chassen of 55
22 Manor Pond Lane, Irvington, New York, 10533
23 previously owned a 49.9 percent membership
24 interest in the debtor. Mr. Chassen,
25 however, was deemed to have resigned as a

Page 292

1 J. SIMPSON
2 member of the debtor as of August 5th,
3 2023, pursuant to the definition of
4 resignation as set forth in the limited
5 liability operating agreement of JJ Arch
6 dated December 11, 2017, as amended and
7 restated on May 22nd, 2021, and Section 7.5
8 of the operating agreement. Accordingly,
9 Mr. Simpson currently owns 100 percent of
10 the equity interest in the debtor.

11 Do you see that?

12 A. I do. I'm missing something
13 that I'm trying to find here and that
14 something refers to -- I'm sorry. Stop for
15 a second. There's something here where it
16 describes how when Chassen worked for
17 somebody in addition to cause which he did,
18 that is here somewhere. I'm looking for
19 that question.

20 Q. I have a question posed to you.
21 Answer the question that was posed.

22 A. Your question -- again, your
23 question is leading but sure.

24 Q. Answer the question.

25 A. Yes. What else do you want to

Page 293

1 J. SIMPSON

2 know?

3 Q. You see that, right?

4 A. Yeah.

5 Q. It says that he resigned as a
6 member as of August 5th, 2023. Is that the
7 same -- correct, is that correct?

8 A. He did.

9 Q. And is that the same day that
10 you sent this termination email that you
11 just referred to before?

12 A. I did.

13 Q. So this August 5th date --
14 this -- strike that.

15 This August 5th, 2023, date is
16 the date that you sent the termination
17 email?

18 A. That was one of the termination
19 emails. That was one. That was one.

20 Q. You sent more than one on
21 August 5th, 2023?

22 A. No. So there was only on
23 August 5th. Only one August 5th, but if
24 you read what the document says how it
25 works --

Page 294

1 J. SIMPSON

2 Q. I'm not asking you --

3 A. I'm telling you.

4 Q. It doesn't matter?

5 A. You can't make up the
6 narrative.

7 Q. I'm asking you questions,
8 Mr. Simpson.

9 A. You can ask questions that are
10 yes or no. When you lie, it doesn't work
11 either. You constantly lie.

12 MR. LORENC: Jeff. You have --

13 Q. You have to answer the
14 questions I ask.

15 A. If you had merit. If you
16 followed the laws and rules, which you
17 don't, yes. To answer your question, yes.

18 Q. As of August 5th, 2023, date,
19 is that referring to the resignation
20 letter that --

21 A. I don't know.

22 Q. -- the resignation email --

23 A. I don't know. I'm not sure
24 that it is. I'm not sure it is. If you
25 read the definition of the document, it

Page 295

1 J. SIMPSON

2 doesn't require such a thing. The document
3 has another revision.

4 Q. So why would you say as of
5 August 5th, 2023?

6 A. Because it also says in the
7 document that the resignation happens on
8 the event of three events. One is death,
9 which didn't happen. Two is working for
10 somebody else, and three is on a cause
11 event. So this may not be referring to the
12 August 5th letter. It could be referring
13 he worked for your friend next to you and
14 the Oak folks August 5th because the joint
15 defense agreement is dated August 4th where
16 he got paid \$200,000 according to his own
17 words to me. So this probably is not
18 referring to the August 5th letter. It's
19 probably referring to the event that
20 occurred as of August 5th, which is
21 different. There's three provisions.

22 Q. You don't know, Mr. Simpson?

23 A. I don't remember off the top of
24 my head. If you want me to study the
25 mission on it, I will. But I'm telling you

Page 296

1 J. SIMPSON
2 from what I read here, this does not
3 explicitly say pursuant to the email. What
4 it says in the event of what occurred on
5 August 5th; and if you read the resignation
6 section of the provision of the document,
7 it says on one of the following events.
8 And it says that the moment that someone
9 works on behalf of someone else, which he
10 did, Oak, you're gone on the event. It
11 doesn't require a letter. And if you go to
12 the bankruptcy --

13 Q. So --

14 A. If you go into the bankruptcy
15 documents and clearly you'll see Andrew
16 Ritter briefed this fully.

17 Q. So it's your contention he
18 started working for Oak on August 5th,
19 2023?

20 A. Yes.

21 Q. And not before this ten?

22 A. You know, I don't know the
23 exact date. At that point, at that point
24 my instinct was August 5th that he did. It
25 seems --

Page 297

1 J. SIMPSON

2 Q. You swore under penalty of
3 perjury to this.

4 A. At the time I knew that. This
5 is many months ago. This is nine months
6 ago. It's a long time ago now. Things
7 change. We learn more information. At the
8 time, my belief was as of August 5th that
9 he was no longer working for JJ Arch. He
10 was working for Oak. And by the way, you
11 look at the bankruptcy. He came and said
12 he can't get a job because he's worried
13 about the resignation clause. You know
14 what you guys did? Let's see if you
15 withdraw this time. Let's see if this
16 actually goes all the way.

17 Q. It's your testimony here that
18 the August 5th --

19 A. The events of August 5th.

20 Q. -- the resignation that
21 occurred on August 5th that's referred --
22 excuse me, excuse me. I'm in the middle?

23 A. I believe so.

24 Q. Excuse me. I'm in the middle
25 of asking a question?

Page 298

1 J. SIMPSON

2 A. You're excused.

3 Q. Your testimony here today is
4 that this August 5th resignation date
5 that's referenced in the email is not
6 referring to the resignation email that you
7 sent him that day. Is that what you're
8 saying?

9 A. I would have to check my notes.
10 It's possible. It's also possible equally
11 that there's three possibilities. One
12 doesn't exist, right? One is that he
13 didn't pass, right? Absolutely not. Two
14 is that the day he starts working for
15 someone else, the resignation then occurs
16 on the factor of the event occurring, which
17 happened most likely on that date. So I
18 believe, I believe, and I have to look at
19 it more carefully if you follow the greater
20 briefing that we did in the bankruptcy case
21 from Andrew Ritter, you're going to see
22 quite a bit of dialogue where he refers to
23 this very issue and he says since Chassen
24 was working for someone else effective that
25 time, that's when it occurred.

Page 299

1 J. SIMPSON

2 So I have to check and confirm
3 it, but I believe -- I believe that is
4 referring to I'm not going to say
5 definitively because I have not looked at
6 this in a very long time.

7 Q. In bankruptcy your counsel said
8 that that happened as of August 5th, 2023?

9 A. I don't know the date, but he
10 definitely said it happened. I have to
11 check. He definitely said in the
12 bankruptcy briefings. He definitely said
13 that because Jared worked for Oak
14 officially that that was not caused and
15 cause was not -- my letter was for cause.
16 This was not for cause. This was
17 resignation on the act. And if you look at
18 the resignation clause in the agreement it
19 says that if you work for someone else, you
20 resign that day.

21 Q. Mr. Simpson, the declaration
22 here says I have reviewed the information
23 in the document --

24 A. But I don't remember.

25 Q. -- and you signed it under

Page 300

1 J. SIMPSON

2 potentially of perjury so --

3 A. It's possible it was right. I
4 just don't remember. I have to look.

5 Q. You would know what the
6 contents --

7 A. Do you know how many documents
8 I've signed in my career? More than you
9 ever have. Look at all the Arch documents.
10 Guess who's signature is on all of them?
11 Me, on every one of them. Why? Because
12 I'm the only one that was credible there,
13 okay? I don't know every single document
14 off the top of any head if this was that
15 reason or not. I'll look at the lawyer's
16 briefs and I will get back to you if you
17 would like, but it will not be today. I
18 have to study the documents to tell you but
19 if that's something you like as a follow up
20 , I'm happy to do it. I'll put it on my
21 list. Fair enough?

22 Q. Mr. Simpson, I'm showing you
23 what's been marked as Exhibit C24 and I
24 think you'll see at 25 on your screen. One
25 second, please. I'm making my note.

Page 301

1 J. SIMPSON

2 (Whereupon, Exhibit C24

3 Affirmation in Opposition to Motion

4 Sequence 13 and 17 was marked for

5 identification as of this date.)

6 A. Okay. What's your question?

7 Q. Do you recognize this document?

8 A. Affirmation 13, 17, I lost it.

9 Yeah.

10 Q. Is this your Affirmation in
11 Opposition to Motion Sequence 13 and 17?

12 A. It appears to be. I haven't
13 read the whole thing yet. Appears to be.
14 What's your question?

15 Q. Is this your signature at
16 the -- on page 21?

17 A. I can look, but I can't verify
18 that this is the accurate document without
19 studying it.

20 Q. But --

21 A. I will check the signature see
22 if the signature page is right. That I'll
23 give you in a moment.

24 Q. Do you agree this is file
25 stamped New York County clerk at the top of

Page 302

1 J. SIMPSON

2 each page?

3 A. That I do. I don't know if
4 it's the complete document.

5 Q. Do you have any reason to
6 believe --

7 A. I have reason to believe you
8 both altered things. You and Thorne
9 altered things. I have reason to believe
10 to be skeptical of everything you guys do.

11 Q. Did you review the testimony
12 before you signed it?

13 A. Of course.

14 Q. Was this your testimony? Was
15 this document your testimony?

16 A. This document is something that
17 was put together more recently and I
18 believe it is testimony, yes. What is your
19 question?

20 Q. Okay. So I want to point your
21 attention to Paragraph 28 of this
22 affirmation in which you say as follows,
23 further, defendant on more than one
24 occasion prior to the litigation commenced
25 and even subsequent to such civil actions

Page 303

1 J. SIMPSON

2 advised that he would be in favor of
3 bankruptcy if the liabilities outweighed
4 the assets. Do you see that?

5 A. Yes.

6 Q. Is that your testimony?

7 A. So this is referring to Chassen
8 writing me letters saying that with regards
9 to JJ Arch that its liabilities outweigh
10 its assets. He absolutely has said that to
11 me in writing which was submitted as part
12 of the bankruptcy. That's what this is
13 saying.

14 Q. This says he advised he would
15 be in favor of bankruptcy. Do you have
16 anything -- you know, saying --

17 A. He didn't say those words
18 explicitly; but our interpretation, me and
19 counsel's interpretation is, multiple
20 counsel's interpretation when someone says
21 the words that you believe that your
22 liabilities outweigh your assets. It is a
23 favorable bankruptcy perspective. Also
24 just by seeking of receivers also
25 definition of bankruptcy, every document.

Page 304

1 J. SIMPSON

2 Q. Mr. Simpson, how can you -- it
3 would not be accurate to say then that he
4 advised you that he was in favor of
5 bankruptcy?

6 A. He signed receiver motions.
7 Receiver motions are definition of
8 bankruptcy of JJ Arch.

9 Q. But he never told you he would
10 be in favor --

11 A. He signed the document. Isn't
12 it the same. He signed the document. Read
13 the receiver motion?

14 Q. Did he ever tell you that he
15 was in favor of bankruptcy, yes or no?

16 A. He signed the receiver motion.
17 It was the definition of bankruptcy. We're
18 not picking words. Read definition of
19 bankruptcy. Does it say seek acquiesce or
20 consent? Ms. Thorne also seek acquiesce
21 and consent to a bankruptcy. That's in the
22 definition in all the documents under the
23 term bankruptcy. The bankruptcy definition
24 has that in every document of real estate
25 including all of ours, so when you saw the

Page 305

1 J. SIMPSON

2 receiver, you would have put the thing in
3 full resource. So do you.

4 By the way, just so you know,
5 also in your most recent document where you
6 asked for relief of the Court, it actually
7 says at the bottom you even suggest Chapter
8 7 bankruptcy, your own document for
9 receives says Chapter 7 as a suggestion.
10 So, yes, you did suggest it multiple times
11 via our client or your client did.

12 Q. That motion was filed after the
13 JJ Arch bankruptcy or after the JJ Arch
14 bankruptcy?

15 A. No. Your first receiver
16 motion, which you withdrew was over a year
17 ago, your first receiver motion.

18 Q. And you're contending that that
19 mentioned -- any mention of bankruptcy?

20 A. It doesn't need to. Look at
21 the definition of bankruptcy. Why don't
22 you read the definition of bankruptcy to
23 me? No, no, no. Why don't you read the
24 definition of bankruptcy to me? You just
25 don't have any knowledge of this stuff. If

Page 306

1 J. SIMPSON

2 you did, you would realize that that's what
3 it means. Full recourse that's happened on
4 a receiver request.

5 Q. Look at Paragraph 29, Mr.
6 Simpson. You testify as such, I relied on
7 Mr. Chassen prior sense thereto taking them
8 to mean that he was in favor of filing
9 bankruptcy.

10 A. He wrote me an email again
11 where he said that the assets are
12 outweighed by the liabilities.

13 Q. But he never told you he was in
14 favor of filing bankruptcy, did he --

15 A. Their belief was that those
16 words were in favor of. That's what
17 counsel advised me of. And also what
18 counsel advised me of seeking acquiescing
19 and consent of a --

20 Q. Which counsel advised you to
21 that?

22 A. I don't have to disclose that.

23 Q. You do have to disclose that.

24 A. I'm not sure. Robert, what's
25 your view on that?

Page 307

1 J. SIMPSON

2 MR. LORENCE: I don't think you
3 have to disclose it, Jeff.

4 A. What do you think?

5 MR. LORENCE: He's indicating a
6 conversation that he had with
7 counsel. You're asking him to reveal
8 attorney/client privilege.

9 MR. SCHWARTZ: But I mean,
10 let's point out in the affidavit
11 where he does rely on the advice of
12 counsel as a defense and if you rely
13 on the advice of counsel as a
14 defense, you waive privilege. So he
15 does have to answer those questions.
16 If you want to seek clarification
17 from the Court about that, I'm more
18 than happy to do so; but he does have
19 to answer those questions.

20 MR. LORENCE: I don't think we
21 have to do that right now. I think
22 that's something we can do
23 housekeeping after the deposition.

24 MR. SCHWARTZ: Well, if we
25 don't do that now, then we are going

Page 308

1 J. SIMPSON

2 to reserve our right to have to, you
3 know, continue the deposition to get
4 that line of questioning because if
5 the Judge does allow those questions,
6 we want to ask him those questions;
7 and if we're going to hold off and
8 not address it with the Judge right
9 now, we would then want to -- we
10 would be reserving our right to ask
11 those questions --

12 MR. LORENC: At a later date.

13 MR. SCHWARTZ: -- to reconvene
14 the deposition before this
15 evidentiary hearing to answer those
16 questions.

17 MR. LORENC: In person or
18 remotely? Because it seems to me
19 there's a -- this is a one question,
20 one answer response.

21 MR. SCHWARTZ: It's not
22 necessarily. Meaning, you know, he
23 has asserted in his affidavit that he
24 relied on the advice of counsel. He
25 has just asserted it again here at

Page 309

1 J. SIMPSON

2 the deposition.

3 MR. LORENCE: I believe he said
4 in his affidavit that he was
5 represented by counsel regarding the
6 bankruptcy. I don't believe he ever
7 used the words relied on the advice
8 of counsel. The two are not the
9 same.

10 MR. SCHWARTZ: So 34 is --

11 A. Excuse me, is Ms. Thorne
12 helping you? That's what I just saw
13 happen.

14 MR. LORENCE: Jeff.

15 A. That's not allowed. I know she
16 ghostwrites you. We've told that a bunch
17 of times. She's smarter than you. Go
18 ahead.

19 MR. SCHWARTZ: Do you see in 34
20 it says: This is why as well as my
21 attorneys representing me at the time
22 the JJ listed I have a 100 percent
23 member interest.

24 MR. LORENCE: Yes. That's not
25 the same.

Page 310

1 J. SIMPSON

2 MR. SCHWARTZ: You see because
3 on the advice of counsel he
4 repeatedly represents --

5 MR. LORENC: Where are you
6 reading from? I saw 38.

7 MR. SCHWARTZ: We can go off
8 the record right now if you want to
9 deal with this?

10 MR. LORENC: I mean, 28 is
11 referring to -- where is it?

12 MR. SCHWARTZ: Let me put it
13 this way, Mr. Simpson, if you're
14 going to rely on counsel as a defense
15 to any of these allegations, you are
16 going to have to disclose the
17 communications with your counsel.

18 A. That's your opinion.

19 Q. That's not my opinion. That's
20 the law.

21 A. No. You've been pretty bad
22 about law so far. The fact you do -- your
23 word is irrelevant. It will be decided
24 amongst a party. It won't be you so if Mr.
25 Lorenc agrees you, great. If he doesn't

Page 311

1 J. SIMPSON

2 agree with you, we take it to the Court.

3 MR. LORENCE: Do we need to do
4 this on the record?

5 MR. SCHWARTZ: Let's go off the
6 record.

7 VIDEOGRAPHER: Off the record.

8 It's 16:21. Ending media unit number
9 four.

10 (Whereupon, an off-the-record
11 discussion was held.)

12 VIDEOGRAPHER: On the record at
13 16:27. Beginning of media unit
14 number five.

15 Q. Hi, Mr. Simpson. I'm going to
16 show you what's been marked as Exhibit C25.
17 It's going to show up here as 26.

18 (Whereupon, Exhibit C25
19 November 14th, 2024, email was marked
20 for identification as of this date.)

21 Q. And it's an email addressed
22 JSimpson001@icloud.com. It forwards an
23 email between you, Mr. Griffin, and
24 Mr. Altman.

25 Do you see this email?

Page 312

1 J. SIMPSON

2 A. Mm-hmm.

3 Q. And do you see that it's
4 subject priv -- it says priv and
5 confidential.

6 Do you see that?

7 A. I do.

8 Q. And what does that mean to you,
9 priv and confidential?

10 A. Usually means that there's a
11 privilege and the messaging is
12 confidential.

13 Q. And did you file this document
14 on the New York state Court electronic
15 filing system?

16 A. I don't recall. It's possible.
17 I don't recall.

18 Q. Did you produce this document
19 to us?

20 A. I don't recall.

21 Q. Have you produced documents to
22 us in this state -- in the state
23 litigation?

24 A. I told you earlier Mr. Lorenc
25 is getting you objections to what those

Page 313

1 J. SIMPSON
2 document productions will be. That's what
3 I told you, and I told you what the prior
4 was. This was not produced by me to you
5 now.

6 Q. Correct.

7 A. I didn't give this to you now
8 in discovery.

9 Q. And you see in this email
10 communication is with Scott Griffin and
11 Stephen Altman.

12 Who is Scott Griffin?

13 A. You know who Scott Griffin is.
14 Scott Griffin is an attorney.

15 Q. Who did he represent?

16 A. He had two different
17 representations. More recently it was JJ
18 Arch LLC.

19 Q. And --

20 A. Together with another attorney.

21 Q. And who is Steve Altman?

22 A. Steve Altman was an attorney
23 who was representing, I believe, me
24 personally. I believe. Can't confirm.

25 Q. Is this an email you sent on

Page 314

1 J. SIMPSON

2 January 25th, 2024, to Mr. Griffin and
3 Mr. Altman?

4 A. Looks like it.

5 Q. And is this email directed to
6 Scott Griffin. It starts Scott. So is it
7 directed to Scott Griffin?

8 A. Appears to be. Again, I don't
9 remember.

10 Q. If you look at the last
11 sentence, it says: If there's an
12 opportunity for you to help JJ Arch LLC at
13 that point, I will introduce you to him and
14 you will be able to dialogue directly on
15 your initiative and compensation
16 requirements. Thank you, Jeff.

17 Do you see that?

18 A. I do. What's your question?

19 Q. What did you mean by your
20 initiative there?

21 A. I don't recall.

22 Q. Was this referring to the
23 bankruptcy?

24 A. I don't recall. We had a lot
25 of different dialogues. A lot of different

Page 315

1 J. SIMPSON
2 things. I don't recall. As you'll see if
3 you keep going down here, this was, you
4 know, insurance company had to approve
5 anything we did and the insurance company
6 was -- we had a lot of spitballs
7 conversations about different strategy so I
8 do not recall what the intentions were of
9 those words. They're pretty vague. I do
10 not recall.

11 Q. I'm going to show you what is
12 going to be marked as Exhibit 26.

13 (Whereupon, Exhibit C26 March
14 6th, 2024, email chain was marked for
15 identification as of this date.)

16 Q. It will show up on your screen
17 as 27.

18 A. Okay. Yup.

19 Q. Do you see this email chain?

20 A. I do.

21 Q. Do you recognize it?

22 A. I do.

23 Q. What do you recognize it to be?

24 A. I recognize it to be me telling
25 Kevin Wiener to stop giving properties

Page 316

1 J. SIMPSON

2 without proper consent and him saying I
3 don't care. That's what it says. That's
4 what it says.

5 Q. And do you see where it says
6 from JSimpson001@iCloud?

7 A. What's your question.

8 Q. On the 6th of March 2024?

9 A. What's your question?

10 Q. Do you see that?

11 A. What's your question?

12 Q. And that was the day?

13 A. Yeah. The days --

14 Q. But that was the day before
15 bankruptcy, right?

16 A. What's the difference? He gave
17 away as sets of mine. He's not allowed too
18 to do without consent. Yes, he gave assets
19 away. I've been clear with you since the
20 beginning the bankruptcy was filed so stop
21 giving away assets of JJ Arch without
22 consent. That's what he asked for Nunc pro
23 tunc settlement discussions. Yeah, that's
24 what you asked for.

25 Q. So you wrote to him you don't

Page 317

1 J. SIMPSON

2 know anything --

3 A. He doesn't. He doesn't know
4 anything. He has no idea what he's doing.
5 That's right. He knows nothing, zero. He
6 is guilty. This is all true. I affirm
7 everything I say here. He did dupe the
8 Judge. Duped, yes.

9 Q. You wrote him, good that you
10 duped one Judge; you won't dupe others?

11 A. Yeah.

12 Q. What others were you referring
13 to? You're in front of Judge Cohen. What
14 others would he be referring to on --

15 A. We talked about the appeal.
16 Look below. It says nothing else until an
17 appeal is filed. I don't know. I don't
18 remember what happened on March 6th. That
19 was a year ago. I can tell you this,
20 everything I said here is damn right. It's
21 damn right. He was a coward with Carter
22 and it's damn right. You didn't like what
23 he said so you withdrew. It's not making
24 fun of him. It's true.

25 Q. And do you see below the email

Page 318

1 J. SIMPSON

2 you sent him at 12:19 p.m. earlier that
3 day, you said: You are a lying, cheating
4 crook --

5 A. He is. He gave away my
6 properties. He lied to the Judge to get
7 control of the company. You all lied to
8 the Judge. You got depositions -- or you
9 got affidavits of people that are just
10 false lies. You weren't allowed to do it,
11 and you colluded together. So, yes, all
12 true. Collusion. True.

13 Q. And then you said the grown ups
14 figure out the real estate --

15 A. Yeah. He's a child. He's a
16 child. Have you met him? He's a child.
17 He has no idea what he's talking about,
18 zero, zero experience, zero, zero.

19 Q. And you called his brother
20 disgusting?

21 A. He is. Have you seen him put
22 his feet on the table in my office? Have
23 you seen what he's done in Cartagena in
24 Bolivia? Have you watched it? I can show
25 you. If he put his dirty feet on the

Page 319

1 J. SIMPSON
2 table, people said to me in HR what's that
3 guy doing with his dirty feet on the table?
4 Who does that? Do you guys do that? What
5 would happen at Haynes Boone if a lawyer
6 came in and put his bare feet on the table.
7 It wouldn't go well in this office or any
8 office that I know of. What he describes
9 to Jared Chassen as sexual activities and
10 what Jared tells me, pretty gross, man,
11 yes, pretty gross.

12 When he hurt Jared's breast
13 friend, Michael Wiener, I'm sorry. Michael
14 Kaplan over his restaurant, when he sues
15 Jared Chassen's brother, that's bad stuff.
16 Bad, bad stuff. And what he's doing here,
17 terrible, the worth.

18 MR. LORENC: No question is
19 posed.

20 A. Next.

21 Q. Let me show you what is going
22 to be marked as Exhibit C27?

23 (Whereupon, Exhibit C27 March
24 5th, 2024, email was marked for
25 identification as of this date.)

Page 320

1 J. SIMPSON

2 Q. This should show up as 28 on
3 your screen if you can take a look at it.

4 A. Yes.

5 Q. Do you recognize this email?
6 Have you ever seen this email before?

7 A. I don't know. But this is not
8 something that comes to me.

9 Q. But you see that --

10 A. It says Allen Schwartz and
11 Steve Altman. I don't even see my name on
12 it.

13 Q. Have you ever seen this before?

14 A. I don't think I have. I don't
15 see my name on here. I'm not sure I've
16 seen this before.

17 Q. Do you see it's dated two days
18 before you put JP Morgan enter
19 bankruptcy --

20 A. What's your point?

21 Q. I'm asking a question.

22 Do you see that this email is
23 dated--

24 A. I do, but this is not a
25 letter -- I'm not on this letter and I'm

Page 321

1 J. SIMPSON

2 not sure I've ever seen it before. I'm not
3 copied here, so I can't tell you that I've
4 seen this.

5 Q. Did Mr. Altman forward you this
6 letter?

7 A. I can look. I don't know.

8 Q. Do you see that this letter
9 says Steve, whether voluntarily or by
10 Judicial coersion, your client will comply
11 with the court's order. The Court ordered
12 your client to ensure that my client has
13 viewing access to the newly open bank
14 accounts. Your client has not done so
15 instead doing nothing for weeks and then
16 after my demand letter sending him a
17 username and password that is inactive and
18 saying he will do nothing further.

19 A. It's not inaccurate. I would
20 bet Steve responded to this. I will look.

21 Q. I'm not sure how you think that
22 this complies with the Court's order.

23 A. How are you asking me? I'm not
24 on this.

25 Q. Have you seen this before?

Page 322

1 J. SIMPSON

2 A. I don't recall it. How are you
3 asking me? I'm not on this. How would I
4 know?

5 Q. Have you --

6 A. This doesn't look familiar.

7 Q. Have you seen the end of the
8 email where it says: Chassen will not be
9 deterring from enforcing his rights in the
10 court's order. Your client will comply
11 will the court's order.

12 Do you see that?

13 A. I do; but, again, I don't know
14 if I've ever seen this before.

15 Q. Two days later did you file
16 bankruptcy for JJ Arch LLC?

17 A. Again, I haven't seen this
18 document that I recall.

19 Q. But two days after March 5th --

20 A. What's the difference? Just
21 because you said so doesn't mean anything.
22 You don't own the company. You're nobody.
23 You're just a disgusting lawyer. I
24 understand you lie to everybody everything.
25 Your guy was gone in August. You knew it.

Page 323

1 J. SIMPSON
2 Leventhol said it to us after that hearing
3 with Bailey, so I don't know. I can't
4 defend what Steve Altman did or didn't do
5 and I can't tell you. The bankruptcy was
6 filed, yes, for good reason. And it should
7 have been bankruptcy year before as counsel
8 advised me to do. And Chassen just didn't
9 like it. He doesn't understand Miller knew
10 it. Everyone else knew it.

11 Q. Mr. Simpson, have you ever
12 taken money in your own personal Zelle from
13 Rever Motors customers?

14 A. So I believe it happened twice
15 and we pushed the money from our account
16 back to it not on purpose because using my
17 phone number for Zelle it came up -- my
18 phone number is tied to two accounts, my
19 personal account, which I don't use for
20 Zelle. And I believe it happened with,
21 like, one, like, the person's name, I
22 remember. It comes up as Joyce something
23 and the manager we got we shifted right
24 back because it shouldn't have come to me;
25 but, again, even so we reconcile it and --

Page 324

1 J. SIMPSON

2 Q. What about more Peter
3 Nicolardi?

4 A. I don't think he gave you money
5 from Zelle.

6 Q. You don't think --

7 A. I don't believe so. I could
8 check. I could check; but, again, if I
9 reconcile everything together, does it
10 change the fact of all my member loans I
11 have to look back and see. If he did give
12 me \$2,000, if 2,000 was owed to me for
13 funding payroll the week before, it
14 wouldn't matter; would it? No, it
15 wouldn't. So I would have to check.

16 Q. Have you ever worked on your
17 own personal investment vehicles with Rever
18 Motors resources?

19 A. My personal --

20 MR. LORENC: What's the
21 definition of personal investment
22 vehicles?

23 MR. SCHWARTZ: A vehicle that
24 Mr. Simpson owns in his own name.

25 Q. Mr. Simpson, have you ever

Page 325

1 J. SIMPSON

2 worked on a vehicle that you owned in your
3 own name at Rever Motors -- or strike that.

4 A. First of all --

5 MR. LORENC: Don't answer.

6 Q. Have you ever used Rever Motors
7 to work on a vehicle that was titled in
8 your name?

9 MR. LORENC: Stop. What do you
10 mean by use Rever Motors?

11 MR. SCHWARTZ: Use Rever Motors
12 employees and resources.

13 MR. LORENC: What do you mean
14 by resources? I'm trying to not
15 object to the question.

16 MR. SCHWARTZ: This is what's
17 called a speaking objection.

18 MR. LORENC: No. I'm asking
19 for clarification to preserve the
20 record so he answers the question
21 correctly.

22 MR. SCHWARTZ: Rever Motors
23 resources. I said employees and
24 resources. It's tools, everything.

25 MR. LORENC: Okay.

Page 326

1 J. SIMPSON

2 A. The tools that are mine, which
3 I provided. The hands that are mine,
4 which --

5 Q. It's a very simple question.

6 A. No. It's a stupid question.
7 It's a stupid question.

8 MR. LORENC: You have to answer
9 the question.

10 A. The answer is, that if I have
11 the profits were then given to Rever Motors
12 solely. So, for example, I sold to Rever
13 Motors a car that was mine at a severe
14 discount and it was sold by Rever Motors
15 for a profit, so Rever Motors made 10 to
16 \$12,000 on it. So if I ever moved a car
17 that was mine, it was at cost or below
18 cost. So it is no --

19 Q. I asked you a very simple
20 question, Mr. Simpson.

21 A. Yeah.

22 Q. My question is, have you ever
23 done that --

24 A. Yes, of course I have. Chassen
25 too. Chassen has a Land Rover Discovery

Page 327

1 J. SIMPSON

2 from there. Chassen has a Porsche from
3 there.

4 Q. How many cars in your own name
5 have you used Rever Motors employees or
6 resources --

7 A. No, no, no. You're
8 misconstruing. There's a big difference.
9 If I take a car that's mine that I bought
10 at a discount and I sold it to Rever Motors
11 for below market, there's a big difference
12 than what you're asking for. That's what I
13 did. If I bought it for \$10,000 and it was
14 below market and I sold it for \$10,000
15 instead of buying the equivalent, that's
16 what I did. Very different.

17 Now, if it's sold after that
18 from \$22,000, \$20,000, Rever benefitted
19 from every dollar. So, no, that is exactly
20 what I've done. Nothing else.

21 Q. Have you ever switched VIN
22 numbers --

23 A. No. We restore cars all the
24 time. We restore cars. If there's a car
25 and we take it off to repaint it, but we

Page 328

1 J. SIMPSON
2 don't chop shop if that's what you're
3 asking me. Absolutely not. We do
4 restoration work every day, which
5 oftentimes means you have to remove plates
6 to put things back together.

7 Q. When you get a deposit from a
8 customer on a car, what's the first thing
9 you do with it?

10 A. A deposit?

11 Q. Yeah, a deposit.

12 A. Usually it depends on what's
13 happening. So, for example, if a car is
14 on-site and we're closing it immediately,
15 that car would get, you know, it would just
16 give us the green light. Always have to do
17 some work on the car. They give us the
18 green light that they're serious. We do
19 the work; and then when they're done with
20 the car, we pay them -- we -- they pay the
21 rest of it. It's gone. The car goes away.
22 Now, if it's a project, sometimes projects
23 are six months, eight months, nine months.
24 Usually deposit is to used to buy a
25 vehicle. It depends. Sometimes we would

Page 329

1 J. SIMPSON

2 start with a project of a thousand dollar
3 car. Sometimes we start with a project
4 that's a \$50,000 car. It just depends.

5 Q. How many customer complaints
6 have you received in the past year with
7 respect to Rever Motors?

8 A. A handful, like, maybe six.

9 Q. And who were those customers?

10 A. I can tell you off the top of
11 my head I only know of two or three.

12 Q. And who are those two or three?

13 A. One of them put on Google,
14 which is horrible this guy Adam Katz who --
15 he actually bought my personal car from me.
16 It wasn't even through Rever Motors. I
17 literally went to this guy's house to help
18 him with the car multiple times. He was
19 just clueless about cars, and he blames me
20 for everything; and it was a no warranty
21 car. He bought two years before; and he
22 made this complaint, like, last month,
23 which makes no sense. And it was literally
24 him wanting something for, like, 200 bucks
25 and people just lose patience; and they do

Page 330

1 J. SIMPSON

2 stupid reviews. I'm trying to think.

3 There was a police --

4 Q. So who else?

5 A. There was a police officer, or
6 former police officer. I don't know what
7 you call him. It's hard to describe what
8 this man is. But he bullied my people. He
9 had a frame that was cracked. It was fully
10 risked. It was his daughter's car. We
11 gave him a full proposal for work. We did
12 every possible imaginable thing in his car.
13 We lost a fortune of money. He asked for
14 more work. He approved the work, and then
15 the last thousand dollars was owed; and,
16 unfortunately, one of the guys at the shop
17 had a small accident where his bumper got
18 damaged. And we got a replacement bumper
19 that he approved. He said he didn't like
20 it and then he said he wants \$5,0000 from
21 us. He extorted us.

22 Q. What's his name?

23 A. I don't know. I have to look
24 it up.

25 Q. What's the third one?

Page 331

1 J. SIMPSON

2 A. So second one, we called the
3 police.

4 (Reporter clarification.)

5 A. We called the police. This
6 person actually took the car off premise
7 without paying the bill, and he
8 literally -- which is against the rules.
9 And the police even said it that you don't
10 take cars off premises without paying. And
11 he bullied my staff in a bullet proof vest
12 and a gun. And my staff was, you know,
13 very shaken by it; and then after the car
14 without paying, he made complaints. So
15 that's two. And then I would have to think
16 about maybe one or two others. It's not
17 something off the top of my head.

18 Q. Do you know where Adam Katz
19 lives?

20 A. East Hampton.

21 Q. Do you know where in East
22 Hampton he lives?

23 A. North 6th, North 8th, something
24 like that. I don't know the exact street.
25 He's not one of the people you guys

Page 332

1 J. SIMPSON
2 Subpoenaed from. I mean, he's -- I went to
3 his house to help him with the car. I
4 offered multiple times, and he brought a
5 car that was actually my car. I don't
6 think he ever passed Rever Motors, and we
7 did some service for him. What's your
8 point? What's your question? People
9 complain in retail. It happens all the
10 time.

11 Q. I'm going to show you what's
12 going to be marked Exhibit C29 if you can
13 take a look at it. It's going to show up
14 on your screen as Exhibit C30. It's 30-31
15 I should say, 30 to 31.

16 (Whereupon, Exhibit C29 letter
17 from Peter Nicolardi was marked for
18 identification as of this date.)

19 A. Yup.

20 Q. You see this is a letter --

21 A. Yes, I do.

22 Q. Peter Nicolardi?

23 A. I do. He's ridiculous.

24 Q. Do you know --

25 A. I do. He's insane.

Page 333

1 J. SIMPSON

2 Q. Do you know Peter Nicolardi
3 writes here that he had problems with his
4 vehicle that he purchased from you?

5 A. I'm well aware. I know
6 everything about his vehicle. I built it
7 with my own two hands, and he got an insane
8 deal and he literally -- I could probably
9 show you in writing. He calls me when the
10 car is done that he doesn't want it because
11 his dog died and cried about his dog dying
12 to me as a grown man for two weeks saying I
13 don't want my car anymore. You should buy
14 it back from me. I said I feel terrible.
15 I have a dog too. Why am I buying your car
16 back from you? Well, I'm so upset. I'm so
17 distraught about my dog dying. The guy
18 went nuts on us.

19 Q. Have you responded to
20 Mr. Nicolardi's complaint here?

21 A. I asked for someone in the
22 office there to do that. It wasn't that
23 long ago. It was more recent. It's
24 possible someone did. I have not myself.
25 I've been dealing with this nonsense, but

Page 334

1 J. SIMPSON

2 we do plan an responding.

3 Q. Do you see here that he says
4 that he had a runaway incident because of
5 an --

6 A. This guy is full of drama, and
7 I don't even know what this even means. I
8 can show you his car was quality. I can
9 show you pictures right now. It was
10 beautiful. It was gorgeous. People loved
11 this car and asked me if they could buy it.
12 This is not a band new car. This was a
13 custom built truck for less than 40 grand,
14 which is a very difficult sell; and his
15 reference was to the engine and stuff. The
16 proposal doesn't reference that at all and
17 his description about years and these cars
18 that are shipped from Europe because
19 they're not in America. There's always
20 miscalculations on VINs and years. It
21 happens on every one of these vehicles that
22 we do, and we do a lot of Land Rovers.

23 Q. I want to show you what's been
24 marked as Exhibit C31. It's going to come
25 up momentarily.

Page 335

1 J. SIMPSON

2 (Whereupon, Exhibit C31 text
3 messages were marked for
4 identification as of this date.)

5 A. This is another Peter
6 Nicolardi, same thing? Jonah.

7 Q. You're familiar with a person
8 named Jonah Ball?

9 A. Yeah. He's 20 years old. He's
10 a child.

11 Q. You see these texts?

12 A. I do.

13 Q. Are these your text
14 exchanges -- are these some of your text
15 Exchanges that you had with Mr. Ball?

16 A. I'll take a look.

17 Q. Take a look.

18 A. I'm looking. What's your
19 question?

20 Q. I'm asking --

21 A. Do you really think you're
22 going to sit here and discern about a child
23 who's 20 years old who tried to fraud us?
24 Do you see about fraud in here? I read
25 what you found. His mother called us and

Page 336

1 J. SIMPSON
2 screamed at us and realized her own son
3 tried to fraud over insurance. He's a kid.
4 He literally tried to fraud us with giving
5 us false insurance, okay? He caused a lot
6 of drama for us.

7 Q. Do you see where Mr. Ball
8 writes, Jeff, I'm a little bummed out. It
9 seems nothing as changed with the car
10 besides AC and he makes out various other
11 complaints --

12 A. Yes. He's a child. Yes.

13 Q. Is this you writing him back,
14 you have not spent more than what it's
15 worth as I've sold three others for more
16 than what you paid for it; and I will not
17 be accepting the car.

18 A. What is your point, Allen?
19 What's your point? The company is doing
20 better than ever. You know what Chassen
21 did? He put one of these on my desk and
22 said you need to watch the cameras while I
23 try to run Arch. Ask my boys. We want to
24 ask them to find out how he tried to
25 distract me. What do you care? He's 20

Page 337

1 J. SIMPSON
2 year old. He's a kid. He paid in full.
3 The car has been there. We fixed anything
4 he wanted, and he tried to dupe the
5 insurance company with his own mother, so
6 depose his mother and ask her about the
7 insurance fraud that he tried to commit.
8 So, yes, I was frustrated that I spent a
9 lot of my own time on this thing and I'm
10 being exposed to insurance fraud because he
11 tried to dupe his own mother.

12 Q. How are you being exposed to
13 insurance fraud?

14 A. He gave us insurance
15 information that was fraudulent, and the
16 insurance broker knew his mother.
17 Insurance broker called -- because he's
18 20 years old. Insurance broker called his
19 mother and asked her and she said it was
20 falsified. Broker calls us and says this
21 is a real problem for us and I said what do
22 you mean? Well, this person is purporting
23 to buy this car. His mother is not
24 allowing him to do what he's doing. I
25 said, how is it on me? She said I here

Page 338

1 J. SIMPSON

2 you. We have to resolve this, and then he
3 called him out on it. This is what happens
4 when you sell \$12,000 cars. It's painful.

5 Q. So you wrote to him that -- he
6 wrote to you this last message that he
7 wrote to you, Hi, Jeff. Hope all is well.
8 Wish you a happy new year. I was wondering
9 if there was a good time for my brother to
10 come pick up the original steering wheel.
11 Sphere.

12 Did you ever respond to that
13 text, message?

14 A. I don't know. What do you
15 care? What is this about? Get out of
16 here. Give me something serious, Allen.
17 You have yet to show me anything today
18 that's of merit. Let's go. It's my
19 business. Again, what has he done,
20 nothing, zero. All he did was whine.

21 Q. So it's your position that it's
22 your business only?

23 A. He's gone. 4.2D, read it, the
24 member loan. You didn't even fight back on
25 it until four months over.

Page 339

1 J. SIMPSON

2 Q. And he has no rights on this
3 business?

4 A. He's gone, gone. Do you want
5 me to read 4.2 to you? Should we read 4.2?
6 He pledged his interest according to 4.2
7 when he took distributions according to the
8 Judge's Order in August. Regardless the
9 Judge wanted to give him temporary rights,
10 which I tried to honor and I believe I
11 have. Other than that, he's gone. As I
12 said to the Court, he's hanging by a thread
13 which makes no sense. And I don't know how
14 the Judge gives him rights after for
15 collusion. So, yes, it's all screwed up.

16 Q. In your mind he has in rights
17 whatever.

18 A. No. Gone. 4.2D. And the 2021
19 he had no rights because you had been a
20 nudnik, and I wanted to get rid of him
21 then. And he cried to me and said can you
22 stick with me. Under duress? 2021.
23 Rights were gone. David Hayman will tell
24 you when we depose him. Next.

25 MR. SCHWARTZ: We're going to

Page 340

1 J. SIMPSON

2 take a five-minute break if that's
3 okay.

4 A. No. I'm done. We've been here
5 all day. Unless the court reporter needs
6 it.

7 MR. LORENC: How much time do
8 we have left?

9 VIDEOGRAPHER: 26 minutes.

10 Q. Mr. Simpson, can you tell me
11 all the law firms that have represented you
12 in this case?

13 A. Am I looking at an exhibit or
14 no?

15 Q. No.

16 A. Sure.

17 Q. Tell me the names of the law
18 firms?

19 A. I have to think about it as I
20 write it out, okay? So Adam Leitman Bailey
21 was involved initially. And it got
22 conflicted with JP Morgan. And don't think
23 I'm not going to tell you why they're not
24 involved because I'm going to. You're not
25 going to do this count on me without me of

Page 341

1 J. SIMPSON

2 how many law firms without me explaining.

3 Q. You're going to just answer the
4 question as asked.

5 A. No. I'm going to defend myself
6 because you tried to stuff me. You know on
7 the docket. It's in the docket. It's on
8 the docket.

9 MR. LORENC: Just --

10 A. Adam Leitman Bailey, Steven
11 Altman.

12 Q. Okay.

13 A. So he's asking me personally.

14 Q. I'm asking you to list me the
15 law firms that have represented you in this
16 case?

17 A. Me, personally, or LLCs?

18 Q. You, personally.

19 A. Is it me, personally?

20 Q. You personally is my question.

21 A. Me, personally, is Steve
22 Altman. And Offit Kurman was under Jason
23 Nagi, that was I believe he was hired
24 personally. Who else was personal? Bailey
25 was on -- as I mentioned earlier was on

Page 342

1 J. SIMPSON
2 three JJ Arch and Arch, and I believe, I
3 believe -- I have to check, but it's
4 definitely JJ Arch and Arch. I don't know
5 if it was personal with Adam Leitman
6 Bailey. I'm not sure.

7 Q. Who paid these law firms?

8 A. So in all the initial firms
9 were paid for by me and, again, as I said
10 to you earlier, if I funded it through JJ
11 Arch or Arch, it came from my personal
12 account through the channels of the company
13 to go outbound so I can get reimbursed,
14 which is what I was supposed to be able to
15 do under indemnities. Then I did get
16 insurance help with the claim I made
17 starting in -- I think I made the claim in
18 October and the claim has been disclosed.
19 I haven't seen your claim yet, which we'll
20 get. In October, I made a claim to the
21 insurance company and the insurance company
22 awarded coverage to me.

23 Q. So JJ Arch has paid for some of
24 your own lawyers that have represented to
25 you, correct?

Page 343

1 J. SIMPSON

2 A. Only, again, no, no, no. Let's
3 be clear. If it was a lawyer representing
4 me personally, I would fund it personally.
5 If it was a lawyer through JJ Arch, I only
6 did it in the bucket it belonged. I would
7 fund it from my money. It was never JJ
8 Arch's money used for any of this. It
9 would go from my money, from my personal
10 account or YJ Simco or one of those
11 accounts, it would stop at JJ Arch and from
12 JJ Arch to the attorney.

13 Q. So you paid Sam Israel from JJ
14 Arch, no?

15 A. It's possible, but it would
16 have come from me first. It would not have
17 been from JJ Arch's money. Didn't have any
18 money.

19 Q. So why would you pay Sam Israel
20 through JJ Arch. Why would you just not
21 pay Sam Israel directly through YJ Simco?

22 A. I have to ask if it's a JJ Arch
23 representation or personal representation.
24 But either way I'm entitled to
25 reimbursement of these legal expenses.

Page 344

1 J. SIMPSON
2 Kevin Wiener even admitted it. I'm
3 entitled to legal expenses for what you
4 guys did to me. You guys ousted me out of
5 the company.

6 Q. And you believe there's no
7 undertaking requirement --

8 A. Hell no. The Judge said there
9 wasn't any. Jared begged for one.

10 Q. You don't think that --

11 A. It says there is no undertaking
12 read it. 7.5B says if someone does a bad
13 act, they're gone forevermore and they're
14 entitled to damages, which is me.

15 Q. How many law firms have
16 represented JJ Arch in this proceeding or
17 in the bankruptcy?

18 A. I have to look. I can't give
19 you a number. I have to look at the
20 individual representations one by one. I
21 would have to check. The bankruptcy, it
22 was a -- so Scott Griffin and Wiggin & Dana
23 actually merged. That firm merged, so it
24 was two but those actually merged into one;
25 and I believe they represented JJ Arch, and

Page 345

1 J. SIMPSON
2 then I believe that -- I believe Offit
3 Kurman representing me personally,
4 O-F-F-I-T. Second one is K-U-R-M-A-N. So
5 that was bankruptcy.

6 Ms. Lorenc has been
7 representing me whatever it is, month, I
8 guess, plus or minus, a month. I do have
9 other attorneys helping JJ Arch in other
10 matters as I've illustrated to you. Ala
11 cart matters like 550, like 1640. Does the
12 name Dan Khan (phonetic) ring a bell to
13 you. Dan Khan reached out to you several
14 names on those -- not litigation matters
15 here, as it relates to those properties.
16 So there's been a lot of attorneys in other
17 places.

18 Q. That answers my question.
19 Thank you.

20 A. What else?

21 Q. Mr. Simpson, the property owned
22 by JJNY 550 LLC is in foreclosure, correct?

23 A. It's being sold, sure. It's in
24 early stages of a judicial foreclosure,
25 yes. That's being sold.

Page 346

1 J. SIMPSON

2 Q. Has JJNY 550 appeared in that
3 action?

4 A. I'm not sure. I don't think
5 so, but it doesn't matter because the
6 lender knows we're paying them.

7 Q. My question is simply --

8 A. It doesn't matter, Allen.
9 We're paying it off. Enough. Bullshit.
10 It's stupidity. Yes. Yes, I don't know if
11 it did. I don't know if it did. I'm
12 assuming it didn't, but it's being paid
13 off --

14 Q. What about 146 East 89th
15 Street --

16 A. Jared decided to do it on his
17 own without talking to me, which he's not
18 allowed to do by the documents. Jared ran
19 off without me.

20 Q. But Borrower 1, Borrower 2, and
21 Borrower 3 have not appeared in that
22 action, correct?

23 A. Somehow Jared has done it
24 without my permission.

25 Q. Jared has appeared on their

Page 347

1 J. SIMPSON

2 behalf?

3 A. Somehow ran off and did it.

4 Q. Is he sued there in that suit
5 as a guarantor?

6 A. I'm sure he is. Doesn't give
7 him the authority to do it.

8 Q. So he's not allowed to appear
9 on his behalf?

10 A. No. As the Judge said, the
11 managing member decides Jared's rights
12 only -- told you that. Same with Oak.

13 Q. So he's being sued as a
14 guarantor; in your mind he's not allowed to
15 appear?

16 A. Look what he did. He destroyed
17 the company by giving the keys to these
18 guys through you with collusion agreement.
19 Did they give us the discovery yet? Can't
20 wait to see the joint defense agreement.
21 Let's see the collusion, yes, everything
22 Chassen has done is screw everything up.

23 Q. Mr. Simpson, let's go take a
24 look at another document if you don't mind.

25 A. I don't mind. Let's go.

Page 348

1 J. SIMPSON

2 Q. I'm going to show you what is
3 going to be marked as Exhibit 32?

4 (Whereupon, Exhibit C32 NYC
5 Department of Buildings Complaint was
6 marked for identification as of this
7 date.)

8 A. It already says 32, different
9 one? Why are you asking them? They swear
10 they're not involved in this. Were they
11 part of your preparation? You're not going
12 to answer me. Why would you?

13 Q. I'm the one asking you the
14 questions today.

15 A. We'll get it from Kevin Wiener,
16 Michael Wiener, we'll get it from
17 everybody. This is going to be a walk in
18 the park compared to those.

19 Q. This is marked as C33. Please
20 take a look at it.

21 (Whereupon, Exhibit C33
22 Department of Buildings violation
23 dated February 7th, 2025, was marked
24 for identification as of this date.)

25 A. Yup.

Page 349

1 J. SIMPSON

2 | P a g e . You see this document --

3 A. Yeah.

4 Q. -- from the Department of
5 Buildings?

6 A. Yup.

7 Q. Do you see that it says here
8 there's a violation for work without a
9 permit?

10 A. This is dated 2/7/25. This is
11 dated, like, how many days ago? I haven't
12 seen this before. 2/7/25. Look at the
13 date on this. First time I've seen this.
14 I have not seen this before.

15 Q. So you're not aware there was a
16 stop work order issued on 7 --

17 A. That stop work order issued
18 which is like anybody --

19 (Reporter clarification.)

20 A. When stop work order is issued
21 like they are in every building department
22 project in every New York City building,
23 but you guys wouldn't know anything about
24 this including Chassen. Building
25 department comes for any call. They give

Page 350

1 J. SIMPSON
2 out stop work orders like candy. In this
3 case stop work order was issued. There
4 were two issues for compliance. We had
5 someone that was teed up to resolve this
6 compliance issues, and then the person was
7 promised for payment; and then that person
8 went dark. And I can even name the
9 consultant that was working on this. All
10 that required was about a thousand dollars
11 of work from a plumber and electrician, do
12 two things; and then the stop work order
13 was going to be lifted. This is over a
14 year ago.

15 Q. Has any work been done on the
16 property --

17 A. No.

18 Q. -- since these stop work orders
19 and violations were issued?

20 A. Nothing. Zero.

21 Q. Okay. I'm marking what is
22 going to be Exhibit C34, if we can take a
23 look at that one.

24 (Whereupon, Exhibit C34 DOB
25 complaint dated December 17th, 2024,

Page 351

1 J. SIMPSON

2 was marked for identification as of
3 this date.)

4 A. 34-51.

5 Q. Yes.

6 A. Isn't that what we just looked
7 at, something different. Same date.

8 Q. I'll turn your attention to the
9 final page of this document.

10 A. Yeah. This is NYC intranet
11 one?

12 Q. Yeah.

13 A. What does it say? What are you
14 asking me?

15 Q. Do you see that this document
16 it says that DOB received a complaint on
17 December 17th, 2024, about the property at
18 146 East 89th Street.

19 A. If that complaint was received,
20 I'm unaware. This is the first I'm seeing
21 this.

22 Q. Do you see this document is
23 certified by the Department of Buildings as
24 a correct record of the Department of
25 Buildings?

Page 352

1 J. SIMPSON

2 A. I don't have a copy of it.

3 I've never seen this before.

4 Q. So you haven't done anything --

5 A. I didn't know.

6 Q. -- to remedy the complaint that
7 was made?

8 A. I didn't know.

9 Q. Why wouldn't you know? You're
10 the managing member, no?

11 A. You want to why. Let's see.
12 Jackasses of there locked me out of my
13 office improperly. Took me off my email
14 improperly. Told me I can't go to the
15 building department improperly. So that's
16 why I wouldn't know because my life is on
17 the line but somehow they convinced the
18 Judge who again duped I shouldn't go to the
19 building department where I have licenses
20 personally on my own project.

21 So, yeah, most likely I don't
22 know because they probably sent an Arch
23 email, probably sent a letter to my proper
24 information, not where I live.

25 Q. So everyone else is to blame

Page 353

1 J. SIMPSON

2 other than yourself?

3 A. Yeah. You ruined the whole
4 damn company. You stole it improperly,
5 illegally. You stole it. Do you not
6 realize you stole it? The Judge told you
7 you stole it. Read the injunction. Yes,
8 you and Thorne stole it. Yes. Kevin
9 Wiener stole it. Two other things.

10 Q. They're not the owners of 146
11 East 89th Street, are they?

12 A. They put the lien on the
13 property. They caused problems in our
14 whole company. They caused the whole
15 company -- look at the numbers. Look at
16 it.

17 Q. But that prevents you from
18 responding to the neighbor's complaint?

19 A. I don't have the information.
20 They robbed my company, robbed everything
21 from me. These people have taken from me.
22 It is illegal and every government agency
23 will investigate them hopefully one day.
24 They can Chase me in Canada. I hope your
25 listening. I can't wait for the day we

Page 354

1 J. SIMPSON

2 depose you for that for the destruction
3 you've caused.

4 Q. Are there unpaid violations at
5 the 146 East 89th Street property?

6 A. I told you already what I know
7 about. I told you that for the violation
8 that I was aware of to cure it was about
9 \$15,000 with a plumber and electrician.
10 That was some months back.

11 Q. So you're not aware --

12 A. This news to me.

13 Q. -- of a \$1200 fine --

14 A. How would I know? Is this
15 addressed to me, personally?

16 Q. But, again, as I said, you're
17 the managing member.

18 A. And, again, as I said the
19 Wieners went to Judge Cohen and said I
20 can't go to the building department. I
21 don't have a license. Do you want to see
22 that? After a went to the building
23 department to clarify what my license was,
24 these idiots went and tried to convince the
25 judge how I couldn't go for my own license,

Page 355

1 J. SIMPSON

2 which is not even allowed. So, no, I don't
3 have any access to building department
4 following a Court Order which made no
5 sense.

6 Q. I would like to show you what's
7 going to be marked as Exhibit C35.

8 A. Show me something good, please.
9 So far it's all bullshit. Garbage, yeah.
10 Laugh because it's all bullshit. It's all
11 made up.

12 MR. LORENC: Jeff, there's no
13 question. Please.

14 A. Yeah, he's full of shit.

15 Q. Let me withdraw that exhibit.
16 I accidentally put the hearing schedule in
17 there. So let me pull that back.

18 A. How much time is on the clock?

19 VIDEOGRAPHER: Another
20 13 minutes.

21 Q. Mr. Simpson, I would like to
22 show use what's going to be marked Exhibit
23 C36. If you can take a moment to look at
24 it.

25 (Whereupon, Exhibit C36

Page 356

1 J. SIMPSON

2 September 4th, 2024, email was marked
3 for identification as of this date.)

4 A. Mm-hmm. What's your question?

5 Q. Is this an email you sent?

6 A. It appears to be. What's your
7 question?

8 Q. Is this an email that you
9 sent --

10 A. I said appears to be. What's
11 your question?

12 Q. Did you send this email just
13 after you had received service of Jared's
14 answer in the 89th Street property
15 foreclosure, yes or no?

16 A. When you say received service,
17 I don't know. I'm not sure that will say
18 attached filing.

19 Q. When you say received service,
20 I'm not sure --

21 A. I don't see attached here.

22 Q. What are you referring?

23 A. I don't know. I would have to
24 look. I would to look at the attachment.
25 Let me see. It looks like it, yeah. It

Page 357

1 J. SIMPSON

2 looks like he decided to go to Court on his
3 own without talking to me first, which he
4 has to do.

5 Q. So you wrote him the attached
6 filing that was made was done in an
7 unauthorized manner--

8 A. Correct, yes.

9 Q. -- and he had absolutely no
10 ability --

11 A. Zero, zero.

12 Q. -- to make such a filing --

13 A. Do you want to read the
14 documents? He's not allowed too that.
15 Absolutely not. Everything I do is by the
16 documents. He's gone.

17 Q. And, Mr. Simpson, have you ever
18 appeared either individually, personally,
19 or on behalf of any of the entities in this
20 foreclosure?

21 A. I've discussed with counsel and
22 I've explored the circumstance. I've also
23 talked to the lender a half a dozen times
24 maybe, sorry, three times, four times.
25 Business lender and other lenders trying to

Page 358

1 J. SIMPSON
2 find a path of resolution. It is a slow
3 moving process that will take years. It's
4 already taken many, many, many months. And
5 Mr. Peldman asked if he could handle it --
6 and, again, let's remember. I had a new
7 loan to take it out. No one else did and
8 Chassen and fought over a hundred grand and
9 it fell apart. So depose them both and
10 ask. A hundred grand. Ask the other
11 partners in it. It was shocking. Ask Ben
12 Ari who negotiated. Last word is A-R-I.
13 Who negotiated that agreement on behalf of
14 JJ Arch who never got paid unfortunately.
15 On the loan that I had I had equity lined
16 up and Jared and Peldman fought over a
17 hundred thousand dollars.

18 Q. Let me ask you --

19 A. It was a solution that got us
20 home.

21 Q. Mr. Simpson, have you ever
22 issued a report under Section 10.5 of the
23 146 East 89 Borrower 1 LLC operating
24 agreement?

25 A. I've issued reports. There's

Page 359

1 J. SIMPSON
2 an email chain which you have a copy of
3 which talks about updates and to-do list
4 and all the partners where we stood on how
5 to do the move the project forward --

6 Q. Do you have evidence that you
7 issued reports --

8 A. I just told you that email is
9 public. Jared has it. You probably have
10 it. It's a public email.

11 Q. Are you going to forward that
12 to me?

13 A. Jared has it. Absolutely.
14 I've already put it on the docket.

15 Q. You've issued reports to the
16 investors pursuant --

17 A. Absolutely. I told the
18 investors where we were with loans, with
19 progress of loans. I've reached out
20 individually and I've reached out to them
21 as a group. Dear 89th Street investors.
22 Go check it out.

23 Q. I had asked you earlier today
24 to locate the name of Jessica who works at
25 Rever Motors?

Page 360

1 J. SIMPSON

2 A. She doesn't work at Rever
3 Motors.

4 Q. She's a 1099 --

5 A. I told you she's a consultant,
6 and she works at the third-party company;
7 and I did get the name for you.

8 Q. And what's her name?

9 A. I just have to look at my
10 phone. The last name is J-A-R-C-I-A.

11 Q. Do you have her telephone
12 number?

13 A. No. I don't believe that's
14 appropriate. Robert, is that appropriate?
15 It's called Harmony Homes Management LLC.
16 I'm not giving you her phone number right
17 now. If Robert decides later. No.

18 MR. LORENC: Put the request
19 in, Allen.

20 Q. So you're refusing to answer
21 that question?

22 A. I'm giving you her name, and
23 I'm giving you LLC. I'm not giving out
24 phone numbers of people that are working
25 for the firm unless --

Page 361

1 J. SIMPSON

2 Q. Mr. Chassen is a co-owner of
3 this business.

4 A. He's not. He lost it, 4.2D.
5 Gone. Just because the Court gave you a
6 string, it doesn't say he gets to call
7 employees just because I don't call
8 employees to solicit them to try to oust me
9 out of the company improperly. This is
10 what you guys do. Just like when you went
11 to my shop clients and you went and
12 subpoenaed those people to cause
13 destruction of the company.

14 MR. LORENC: Jeff.

15 A. You have to cause --

16 Q. So you're not going to give us
17 her phone number?

18 A. No. If Mr. Lorenc decides it's
19 appropriate, then I'll do it.

20 Q. I also asked earlier for the
21 properties that are owned by YJ Simco LLC.
22 Are you --

23 A. Right. And that was something
24 we discussed.

25 Q. Are you going to be --

Page 362

1 J. SIMPSON

2 A. That's up to Mr. Lorenc.

3 MR. SCHWARTZ: Are you going to
4 be allowing him to identify the
5 properties owned by YJ Simco LLC?

6 MR. LORENC: No. I think it's
7 completely outside the scope.

8 MR. SCHWARTZ: So you're going
9 to direct him not to answer.

10 MR. LORENC: Based on the
11 scheduling letter, yes.

12 MR. SCHWARTZ: I believe I --
13 with respect to the attorney/client
14 privilege issue, we will reserve our
15 right to raise that with the Judge
16 and for further questioning as to the
17 communications Mr. Simpson had with
18 counsel as to the bankruptcy.

19 MR. LORENC: So as long as that
20 can be established --

21 MR. SCHWARTZ: How much time is
22 left here?

23 MR. LORENC: Six minutes.

24 MR. SCHWARTZ: Ms. Thorne is
25 going to ask Mr. Simpson a few

Page 363

1 J. SIMPSON

2 questions.

3 A. No, not happening.

4 MR. LORENC: Stop, stop, stop.

5 On January 14th during that
6 scheduling hearing, it was made very
7 clear that the scope of the
8 examination is going to be defendant
9 Chassen examination of Simpson
10 concerning Motion 17. In fact,
11 Ms. Thorne wanted to make sure that
12 by not seeking to take his deposition
13 for this particular motion -- excuse
14 me. Let me finish -- that she was
15 not waiving her right to do so at a
16 later time and, in fact, Judge Cohen
17 confirmed that.

18 MS. THORNE: Judge Cohen also
19 allows us to take our own testimony
20 today, and there's nothing in the
21 rules that would prohibit us from
22 doing so.

23 EXAMINATION BY

24 MS. THORNE:

25 Q. Mr. Simpson, you've taken the

Page 364

1 J. SIMPSON

2 position --

3 A. No, no, no.

4 Q. Excuse me, let me finish the
5 question.

6 A. No. She's not doing this.

7 Q. You've taken the position that
8 you can't provide accounting records for JJ
9 Arch and the --

10 A. I'm not answering your question
11 today.

12 Q. -- JJ properties because Oak
13 controls those records, correct?

14 A. Unless you feel I should answer
15 your question.

16 MR. LORENC: Ms. Thorne, if you
17 can point me to where in the
18 transcript Judge Cohen --

19 MS. THORNE: I am not going to
20 do that. I'm not wasting the five
21 minutes I have. Are you instructing
22 him not to answer my questions?

23 MR. LORENC: If you can just
24 point me --

25 MS. THORNE: Are you

Page 365

1 J. SIMPSON

2 instructing him not to answer my
3 questions?

4 Q. Mr. --

5 MR. LORENC: I'm asking you to
6 point me to the transcript.

7 MS. THORNE: No. All you are
8 doing is eating the time so your
9 client doesn't have a fit on the
10 record as he's been doing all day,
11 and so I will tell you --

12 MR. LORENC: Let's pull up the
13 order and take a look.

14 MS. THORNE: There is
15 absolutely nothing prohibiting my
16 right to ask questions here when your
17 client has made allegations that he
18 can not provide Mr. Chassen with
19 information -- listen to me and let
20 me finish my question.

21 A. Shut up.

22 MS. THORNE: You have asked me
23 a question, and I am answering it.

24 MR. LORENC: Please do.

25 MS. THORNE: Mr. Simpson has

Page 366

1 J. SIMPSON

2 alleged that he cannot provide
3 information to his partner at JJ Arch
4 because my client controls those
5 records. I am entitled to ask
6 questions on that. Your client has
7 spent all day casting aspersions on
8 my client.

9 A. Yeah, garbage. Garbage.

10 MS. THORNE: The idea that I
11 cannot ask any questions about that
12 that is patently absurd and Judge
13 Cohen has said nothing that would
14 prohibit me from doing that.

15 MR. LORENC: I'm not saying
16 that you can't call him for a
17 deposition. I need to consult the --

18 MS. THORNE: Once there is a
19 notice provided, any of the parties
20 can ask questions. This is black
21 letter law. If you are telling him
22 not to answer my questions, that's
23 fine.

24 MR. LORENC: I'm just asking
25 you to give me a minute to look at

Page 367

1 J. SIMPSON

2 the transcript, and we can stop the
3 clock.

4 MS. THORNE: I will consider
5 the clock stopped as of five minutes
6 ago because you've eaten up the time
7 with this baseless objection.

8 MR. LORENC: That's fair
9 enough. Give me a minute to check
10 the transcript.

11 MS. THORNE: Okay.

12 MR. LORENC: So this is where
13 I'm reading from. Okay. Starting
14 from your statement to the Court,
15 Your Honor, this, again, is Leslie
16 Thorne for -- that's right. I'm
17 unfortunately unavailable from the
18 10th through the 20th in February,
19 but I think it sounds like this is a
20 fairly limited question that may not
21 need our involvement at the hearing,
22 okay? Then moving on to on page 41
23 right at the top, again, Ms. Thorne,
24 you state briefly with respect to
25 Oaks, since Oak is not involved in

Page 368

1 J. SIMPSON

2 the issues that will be heard on the
3 25th, I just want to confirm that Oak
4 will have another opportunity at a
5 later date to, you know, take the
6 deposition of Mr. Simpson or
7 Mr. Schwartz who I assume will likely
8 be deposed prior to the hearing.

9 MS. THORNE: Yes? You can keep
10 going. I don't see anything in there
11 that would prohibit us from asking
12 questions.

13 MR. LORENC: The Court responds
14 yes, there are not -- excuse me.
15 These are not the only -- these are
16 not the one and only depositions for
17 the purposes of these cases. There
18 are going to be, you know, narrow
19 ones. These are depositions for this
20 preliminary hearing. I would hope
21 that we would not be taking
22 duplicated ones later on and wasting
23 people's time, but I would agree it's
24 a fair point. So it's not your one
25 and only time. Thank you, your

Page 369

1 J. SIMPSON

2 Honor.

3 MS. THORNE: Are you committing
4 today that Mr. Simpson will offer
5 zero testimony involving Oak or Oak's
6 principals during the hearing on the
7 25th?

8 MR. LORENCE: Say that again?

9 MS. THORNE: Your basis for him
10 not being able to answer my questions
11 is that Oak is totally uninvolved.
12 And I generally agree with you. Oak
13 should not be involved --

14 MR. LORENCE: Based on your
15 representations here.

16 MS. THORNE: Are you telling me
17 today, are you committing that your
18 client will not offer any testimony
19 on the 25th about Oak or its
20 principles?

21 MR. LORENCE: No. I can't
22 commit to that.

23 MS. THORNE: Well, then I think
24 that that's a little bit difficult a
25 position for you to maintain to say

Page 370

1 J. SIMPSON

2 that he's going to testify about Oak
3 and yet you won't allow him to answer
4 any questions from Oak's attorneys
5 today.

6 MR. LORENC: Can you give me
7 two minutes to speak to the client?

8 MS. THORNE: Yes.

9 VIDEOGRAPHER: Off the record
10 at 17:15.

11 (Whereupon, a short recess was
12 taken.)

13 VIDEOGRAPHER: On the record at
14 1720. Please proceed.

15 Q. Mr. Simpson, as you know I'm
16 lessee Thorne. I represent Oak. I have a
17 few questions for you today. You've taken
18 the position that you can't provide
19 accounting records for JJ Arch and the JJ
20 Arch controlled entities because Oak
21 controls those records.

22 Is that right?

23 A. What I said was that Oak has
24 taken over the Dropbox, has taken over
25 pretty much everything, from his email all

Page 371

1 J. SIMPSON
2 the systems I had in the company which we
3 did use JJ Arch as well. So the issues are
4 multiple. One, Oak sends out JJ Arch
5 investment reports to JJ Arch investors.
6 I've told Kevin this many times improperly;
7 so for the JJ Arch investment entities,
8 he's giving those reports out to my
9 investors. He sends the tax returns to
10 those people, K1s to those people without
11 my authority. That is not appropriate. If
12 he has those materials, he should be
13 sending them to me. He should not be
14 issuing them to those people, so that is
15 definitely a problem number one.

16 Number two, this whole shebang
17 with JP Morgan and First Republic is
18 absolutely caused by you and him. If you
19 guys didn't go steal the bank accounts,
20 this would never be a place in the first
21 place. I have a good relationship with
22 First Republic. If Jared didn't go to
23 Kristy Santoro on Kevin Wiener's demand,
24 which I've seen the emails and ask to go
25 take the bank accounts, none of this would

Page 372

1 J. SIMPSON

2 have happened in the first place.

3 So since that bank account
4 confusion, I just got an email right now
5 with Kevin and Michael on it from the bank
6 still a year and a half later. The bank,
7 if you didn't pay attention to all your
8 times in Court about the bank being there
9 and Honorable Judge Cohen feeling bad for
10 the bank, the bank has still not given
11 proper access. So you can tell me I'm
12 wrong, make those facial expressions, but
13 I'm right.

14 JP Morgan is still an issue.
15 Jared has told me to my face it's still an
16 issue. So JP Morgan reporting is very
17 difficult and acts very difficult. Thank
18 you to your client and to Jared. If you
19 didn't go to First Republic, just cause and
20 effect, if you didn't do First Republic and
21 say hey, take Simpson off all the bank
22 accounts, which you did, when I say you,
23 collectively you guys did. We have emails
24 to prove it. None of the bank stuff would
25 be a problem, so that's a real issue that

Page 373

1 J. SIMPSON

2 continues to be a problem.

3 With regards to Dropbox and
4 regards to files, et cetera, the Court
5 email, I got emails at times through JJ
6 Arch. You guys just took me off the system
7 with no regard in the world as you thought
8 you could, and you can't but you did it and
9 the Judge allowed it and, again, also due
10 to interpretation, and I just don't agree
11 with him and I'm allowed to. You did a lot
12 of things you're not supposed to do and you
13 did it. Those are the facts of life.

14 Same goes for QuickBooks.

15 Quickbooks were a collective use -- had all
16 the account access for everything in the
17 company. Go to your 719 memo. You want to
18 put in your own accountant to run all the
19 stuff. Well, look at all the signature
20 cards when JP Morgan switched things over.
21 My personal accounts were on there. JP
22 Morgan accounts were on there. Bill
23 Wieners account was on there. It was a
24 cluster mess. Still not resolved to this
25 day, so I can't give information when I

Page 374

1 J. SIMPSON

2 don't have it. So what further question do
3 you have for me?

4 MS. THORNE: Well, I'm going to
5 move to strike as nonresponsive.

6 A. No. It's not nonresponsive. I
7 gave you a very clear answer.

8 MR. LORENC: Stop, stop.

9 Q. I notice all day today you've
10 been taking note?

11 A. Yeah.

12 Q. Is that just to refresh your
13 recollection?

14 A. My notes, if you want to show
15 it to him, it's literally me jotting down,
16 like, things that are said. So when I'm
17 talking to you to answer you guys. There's
18 nothing here. I'm happy to show them to
19 you. You can look at them there's nothing
20 here. I gave you the list of the workers.
21 I'm not sure why you would --

22 Q. Let's mark them as an exhibit.

23 A. I'm not giving my notes out.

24 Q. You just said you can look at
25 them. Now you're refusing?

Page 375

1 J. SIMPSON

2 A. I'm saying you can look at them
3 here if you'd like, but I don't think any
4 notes should be put as exhibit. Why would
5 my notes be relevant --

6 Q. Well, have you been jotting
7 down things so you can remember them?

8 A. I was jotting down things to
9 answer your questions here today.

10 Q. Okay. So it's just to refresh
11 your recollection?

12 A. No. It's to when I hear
13 someone speak, right, like anyone taking
14 notes, so when I answer them, I would write
15 a keyword to myself. Like, it says here --
16 I said here verify exhibit, right, like, I
17 heard someone say something about exhibit
18 and I would verify the exhibit as I'm
19 seeing it. I wrote C2 when he said to me
20 C2. There's nothing here.

21 Q. Right. We would ask you to
22 preserve those notes and we will ask for
23 them to be --

24 A. You can see them before you
25 leave. I'm not making photocopies of them,

Page 376

1 J. SIMPSON

2 but there's nothing of substance mere.

3 Q. -- produced later. Thank you.

4 Also are you on any medication
5 or other drugs today?

6 MR. LORENC: Objection, basis.

7 MS. THORNE: I'm looking for
8 something to explain the erratic
9 behavior today.

10 A. Erratic behavior.

11 Q. Yes.

12 MR. LORENC: Objection.

13 A. Sure, sure. You're lying.

14 MS. THORNE: Are you
15 instructing him not to answer?

16 MR. LORENC: Are you asking him
17 if he is on medication that would
18 cause him to exhibit signs of a
19 particular mental disorder?

20 MS. THORNE: Yes. That is what
21 I'm asking.

22 MR. LORENC: Okay.

23 A. I don't understand the
24 question. She's not entitled to know what
25 medications I take or don't take.

Page 377

1 J. SIMPSON

2 MR. LORENC: Can you rephrase?

3 Q. Are you on any medications that
4 are psychological in nature?

5 A. Whatever medications I'm on or
6 I'm not on I don't believe I have to tell
7 you. I don't believe I do. Do I have to
8 tell her what medications I'm on? Why is
9 it their business what my medical --

10 MR. LORENC: Stop, stop, stop.

11 Can you repeat the question, please?

12 MS. THORNE: Yes.

13 Q. Are you on any medications
14 today that could affect your psychological
15 functioning?

16 A. There's nothing -- whatever
17 medication I do or don't take today is no
18 different than any other day. So whatever
19 medications I have, I'm not taking anything
20 special for this if that's what you're
21 asking me. I'm not taking some sort of
22 narcotic or something for today, absolutely
23 not. Whatever medications I've been
24 prescribed to by doctors, whatever my
25 issues are, I don't feel comfortable

Page 378

1 J. SIMPSON

2 sharing that is, like, whatever that is
3 that is; and that's between me and my
4 doctor. I don't believe that's your
5 business at all.

6 MR. LORENC: All right. Times
7 up.

8 Q. Have you ever been diagnosed
9 with any mental health issue?

10 A. I don't know what that means.

11 Q. Okay.

12 A. And I'm not sure I'm going to
13 ask whatever I am or I'm not. What
14 relevance do you have here.

15 MR. LORENC: Times up. Stop
16 talking.

17 MS. THORNE: We reserve the
18 right to seek to reopen the
19 deposition to obtain answers to those
20 questions.

21 A. Which questions? I'm not
22 answering --

23 MR. LORENC: Just stop talking.
24 Thank you.

25 VIDEOGRAPHER: This concludes

Page 379

1 J. SIMPSON
2 today's testimony given by Jeffrey
3 Simpson as stipulated by all parties.
4 Total number of units used was five
5 and will be retained by Veritext
6 Legal Solutions. We are off the
7 record at 17:27.

8 MS. THORNE: I'm ordering a
9 copy. Daily expedite.

10 MR. SCHWARTZ: And I'll take
11 the rough and the daily expedite.

12 (Whereupon, at 5:27 p.m. the
13 Examination of this witness was
14 concluded.)

15

16 ◦ ◦ ◦ ◦

17

18

19

20

21

22

23

24

25

Page 380

1 J. SIMPSON

2 D E C L A R A T I O N

3

4 I hereby certify that having been
5 first duly sworn to testify to the truth, I
6 gave the above testimony.

7

8 I FURTHER CERTIFY that the foregoing
9 transcript is a true and correct transcript
10 of the testimony given by me at the time
11 and place specified hereinbefore.

12

13

14

15 -----
16 JEFFREY SIMPSON

17

18 Subscribed and sworn to before me
19 this _____ day of _____ 20_____.
20

21

22 -----
23 NOTARY PUBLIC

24

25

Page 381

1

2 EXHIBITS

3

4 EXHIBITS

5

	EXHIBIT EXHIBIT	PAGE
	NUMBER DESCRIPTION	
8	Exh C1 February 9th, 2025, email	18
9	Exh C2 Notice of Discovery	18
10	Exh C3 Banking records for YJ	168
11	Simco LLC	
12	Exh C4 Loan document for 16	184
13	Montauk	
14	Exh C5 Global Notes and Statement	192
15	of Limitations Methodology	
16	and Disclaimer Regarded	
17	the Debtor's Schedules and	
18	Statement of Financial	
19	Affairs in connection with	
20	the JJ Arch LLC Bankruptcy	
21	Exh C6 Order Regarding Interim	211
22	Operating Procedures	
23	Exh C8 Order to Show Cause	228
24	Exh C9 Order Regarding Measures	233
25	During the Pendency of the	

381

Page 382

1

2 **Order to Show Cause**

3

Regarding the Appointment

4

of Receiver for JJ Arch

5

Exh C10 Email to Judge Kaplan **238**

6

Exh C11 Decision and Order on **243**
 Motion 3

7

Exh C12 Order signed by Judge Joel **250**
 M. Cohen

8

Exh C13 Order to Show Cause **253**

9

Exh C14 Email with letter dated **256**
 February 29th, 2024

10

Exh C16 March 4, 2024, email **262**

11

Exh C17 March 7th, 2024, email **267**

12

Exh C18 Order to Show Cause for **272**
 Motion 13

13

Exh C19 November 19th, 2024, email **278**

14

Exh C21 November 19th, 2024, email **283**

15

Exh C22 August 5th, 2023, email **286**

16

Exh C23 Voluntary Petition For **287**
 Non-Individual's Filing
 For Bankruptcy

17

Exh C24 Affirmation in Opposition **301**
 to Motion Sequence 13 and
 17

382

Page 383

1			
2	Exh C25	November 14th, 2024, email	311
3	Exh C26	March 6th, 2024, email	315
4		chain	
5	Exh C27	March 5th, 2024, email	319
6	Exh C29	Letter from Peter Nicolardi	332
7			
8	Exh C31	Text messages	335
9	Exh C32	NYC Department of Buildings Complaint	348
10			
11	Exh C33	Department of Buildings violation dated February 7th, 2025	348
12			
13			
14	Exh C34	DOB complaint dated December 17th, 2024	350
15			
16	Exh C36	September 4th, 2024, email	356
17			
18			
19		I N D E X	
20			
21	EXAMINATION BY	PAGE	
22	MR. SCHWARTZ	9	
23	MS. THORNE	363	
24			
25			

383

Page 384

1

2 INFORMATION AND/OR DOCUMENTS REQUESTED

3

	INFORMATION AND/OR DOCUMENTS	PAGE
5	Email with Mr. Kennedy testified	29
6	to	
7	List of the tax returns that had	50
8	not yet been filed that are	
9	outstanding	
10	All banking records of the JJ	152
11	Arch and JJ Arch controlled	
12	entities at Citizens Bank and at	
13	JP Morgan Chase bank be produced	
14	to us forthwith	
15	Preserve and produce notes the	375
16	witness took during deposition	

17

18 QUESTIONS MARKED FOR RULINGS

QUESTION	PAGE	LINE
Which counsel advised	306	19
You to that?		

22

23

24

25

384

Page 385

1

2 C E R T I F I C A T E

3

4 STATE OF NEW YORK)

: SS.:

5 COUNTY OF SUFFOLK)

6

7

8 I, NICOLE VELTRI, RPR, CRR, a Notary
9 Public for and within the State of New
10 York, do hereby certify:

11 That the witness whose examination is
12 hereinbefore set forth was duly sworn and
13 that such examination is a true record of
14 the testimony given by that witness.

15 I further certify that I am not
16 related to any of the parties to this
17 action by blood or by marriage and that I
18 am in no way interested in the outcome of
19 this matter.

20 IN WITNESS WHEREOF, I have hereunto
21 set my hand this 14th day of February 2025.

22

23



24 NICOLE VELTRI, RPR, CRR

25

Page 386

1 ERRATA SHEET

2 VERITEXT/NEW YORK REPORTING, LLC

3 CASE NAME: Simpson, Jeffrey v. Chassen, Jared

4 DATE OF DEPOSITION: 2/13/2025

5 WITNESSES' NAME: Jeffrey Simpson

PAGE	LINE (S)	CHANGE	REASON
6			
7			
8			
9			
10			
11			
12			
13			
14			
15			
16			
17			
18			
19			
20			
21			

22 _____
SUBSCRIBED AND SWORN TO BEFORE ME
23 THIS ____ DAY OF _____, 20 _____.
2425 _____
(NOTARY PUBLIC)_____
MY COMMISSION EXPIRES:

[& - 1640]

Page 1

&	100 204:18 205:11 291:12 292:9 309:22 100,000 148:10	12 158:6 243:11 12,000 326:16 338:4	71:18 72:23 73:5,8,14 76:19 77:11,19 85:17 131:11
0	10019 3:18 10036 2:19 3:5 1007 290:25 1007-3 291:2	12,500 171:23 12-11 250:25 1200 95:18 99:8 354:13	133:13 137:16 139:4 346:14 351:18 353:10 354:5 358:23
1	10112 3:14 10533 291:22 1087 23:14 1099 31:9,25 32:4,7,8,24 33:3 165:16,21 165:22 360:4	1217 175:9 12:19 318:2 12:20 104:17 12:34 104:22 12:43 116:18 12:45 116:22 12th 240:2	148 173:10 14:07 210:24 14:47 211:5 14th 178:5 194:6 311:19 363:5 383:2 385:21
1	1099s 165:23 10:32 6:4 10:34 2:13 10:36 282:2,3 10:42 17:4 10th 201:8 367:18	13 2:12 250:25 251:2 272:24 273:10 301:4,8 301:11 355:20 382:16,24 1300 99:8 1315 290:10	15 47:14 48:16 107:20 108:6 256:21 257:3,4 15,000 146:22 147:13 151:25 173:14 198:2 354:9
1.45	119:6	1325 3:18	152 384:10
1/29	180:7	136 169:17	158055/2023
10	107:20 210:11 233:12 326:15	11/22/2023 249:22 251:9	1:8,16 2:5 7:8 15:48 285:16
10,000	29:10 146:22 147:14 152:8 179:21 180:2,8,15 181:2,7,11,20 181:22,23 200:17 327:13 327:14	110 176:18 11210 3:10 11:04 17:8 11:45 19:2 11:54 279:10 11th 213:22 261:17 262:7	15:59 285:21 16 47:13,14 204:21,24 205:2,4 253:17 14,000 178:7 144 171:20 146 1:13,21 51:3,4,4 71:15
10-8	234:14		184:21 186:10 263:3 381:12
10.5	358:22		1640 1:13,13,21 1:21 50:25 51:9 65:21,22 67:10,15,22

[1640 - 2023]

Page 2

69:15 70:12,12	190:12 269:5	19900 385:23	380:19 386:22
70:25 74:18,20	275:3,6,7	19th 169:23	20,000 169:25
74:22 75:2	345:11	278:10,15	327:18
76:5 78:7,22	1640s 278:2	281:6 282:4	200 329:24
79:17 81:19,20	165,000 196:18	283:13,21	200,000 295:16
82:22 83:6,11	198:18	382:17,18	201 288:22
83:12,19,20,22	167 175:6	1:06 280:2	289:18 290:20
84:8,25 86:13	168 381:10	1st 244:24	2017 213:23
86:16,18,19,22	16:21 311:8	2	292:6
87:9,10,12	16:27 311:13	2 18:12 51:2,4	202 288:19,23
90:20 91:4,19	16th 2:19	73:3,6 77:12	2021 102:9
92:16,18 93:17	17 141:2,22	85:18 145:23	104:5 213:24
96:5,24 99:13	142:6,18 220:9	213:5 251:25	214:5,10
101:3 102:11	220:12 262:17	254:23 275:14	215:21,22,23
102:20 104:6	263:2,3 301:4	290:2 291:17	216:6 217:13
130:18 131:6,9	301:8,11	291:20 346:20	218:19 292:7
141:6 146:21	363:10 382:25	2,000 93:9,10	339:18,22
148:19 149:10	17,500 91:6	108:8 324:12	2022 87:16
150:19,23,25	17-16 267:4	324:12	102:9,18,18
151:4,6,9,24	1720 370:14	2/11 229:5	104:4,5,13
153:9,12	174 176:16	273:5	105:5,10 106:9
154:13,20,20	175 179:18	2/11/2025	155:3 186:4
154:23 155:2	17:15 370:10	273:6	2023 53:25
157:16 169:24	17:27 379:7	2/11/25 273:3	56:3 60:3
170:6 171:23	17th 350:25	2/13/2025	85:21 87:16
172:3 173:6,7	351:17 383:15	386:3	91:21,22,23
173:8,13,16	18 149:10	2/7/25 349:10	92:3,11 104:11
175:10,15	267:8 381:8,9	349:12	105:21,22
176:7,19 177:3	184 381:12	20 99:18 119:9	106:23 107:4
177:6 178:6,11	18th 273:20	162:21 206:18	109:13,14,21
178:15,23	19 272:21	278:8 279:16	128:21,22
179:5,13,20	384:20	335:9,23	130:12 153:23
180:2 181:9	192 381:14	336:25 337:18	154:3 156:10
186:23 187:12			162:5,5,8

[2023 - 29th]

Page 3

196:16,17	267:16 273:20	225 1:12,20	25 240:13,19
201:8 205:16	278:10,15	50:24 58:4,8	300:24
213:6 217:8,22	281:6 283:13	58:14 60:16	25,000 108:6
244:24 286:3	289:15,22	61:17 65:21	145:23,23
286:22 287:3	311:19 314:2	70:14 71:2	147:9,12
292:3 293:6,15	315:14 316:8	74:15 78:17	250 382:8
293:21 294:18	319:24 350:25	82:15 99:22	253 382:10
295:5 296:19	351:17 356:2	100:15 103:3	256 382:11
299:8 382:19	382:12,13,14	103:15,25	25th 180:4
2024 23:11	382:17,18	104:25 105:2,3	196:16,16
58:6 61:16,20	383:2,3,5,15,16	105:9 107:3	314:2 368:3
84:2,6,10,19	2025 2:12 6:4	113:3,7 119:24	369:7,19
86:7,14 88:2	15:18 18:5	120:15,25	26 311:17
91:20 92:4,19	23:7 47:12	121:13,19	315:12 340:9
93:18 95:19	178:5 179:7,22	122:9,24	262 382:13
96:10 99:12,20	180:4 348:23	123:17 125:12	2635 3:9
100:6,11,14,20	381:8 383:13	126:2 131:14	267 382:14
100:24 108:20	385:21	132:17 137:9	26th 3:13
109:23 111:13	207 193:5,13	138:22 149:22	27 315:17
112:5 114:14	205:3	228 381:23	272 382:15
114:17,21	20th 367:18	22nd 213:24	278 382:17
115:5 117:18	21 301:16	292:7	27th 205:15
117:22 120:6	211 381:21	23 47:13 48:8	28 204:16
121:7,20	21st 178:22	87:19 147:8,25	302:21 310:10
122:10,25	179:6 217:8,22	156:11 238:5	320:2
123:17 126:3	22 148:17	286:19	28,000 101:21
129:14,23,24	283:11	233 381:24	283 382:18
130:16 132:17	22,000 327:18	238 382:5	286 382:19
137:23 146:17	22-20 283:15	23rd 207:5	287 382:20
147:7,8 158:16	221 4:2 5:2	24 147:9,25	29 306:5 384:5
194:6 207:5	221.1 4:3	156:11,12	29th 179:18,22
219:15 240:2	221.2 4:17 5:7	287:23	256:15 257:10
256:16 257:10	221.3 5:3	243 382:6	382:12
262:19 267:10			

[3 - 5th]

Page 4

3	3115 4:5,14,22 315 383:3 319 383:5 31st 207:16 32 193:4 348:3 348:8 332 383:6 335 383:8 34 309:10,19 34-51 351:4 348 383:9,11 350 383:14 3500 96:16 356 383:16 36 226:25 232:9 363 383:23 375 384:15 38 310:6 38,000 194:7,10 194:17 195:18 381 381:25 382 382:25 383 383:25 384 384:25 39 215:21	291:16 338:23 4.2d. 339:18 361:4 40 100:10 155:21 156:16 160:18 334:13 40,000 57:10 100:5,7 105:19 148:25,25 149:11 150:21 151:6,13 400 126:11,18 208:23 41 367:22 44 277:18 45th 3:5 49.9 291:23 4e 3:9 4th 23:7 295:15 356:2 383:16 5	50,000 148:9 329:4 500,000 89:5 182:25 206:17 55 144:16 291:21 550 1:13,20 50:25 55:11 60:16 65:22 70:23 71:2 75:5,14,16 78:20 85:14 100:21 102:23 126:9,15 128:9 129:2 130:9 131:3 139:9 158:8 345:11 345:22 346:2 5:04 283:22 5:27 379:12 5th 15:18 286:3 286:22 287:3 292:2 293:6,13 293:15,21,23 293:23 294:18 295:5,12,14,18 295:20 296:5 296:18,24 297:8,18,19,21 298:4 299:8 319:24 322:19 382:19 383:5
30 3:13 15:12 15:15 96:15 105:19 155:21 162:21 332:15 30,000 99:19 101:20 119:10 30-31 332:14 300,000 149:8 301 382:23 306 384:20 31 4:10 332:15 311 383:2	4 4 168:6 262:19 382:13 4.2 339:5,5,6 4.2d 182:16,20 184:7 205:25 208:12 291:14	178:24 5,0000 330:20 50 81:22 101:10 155:21 156:16 285:11 384:7	

[6 - access]

Page 5

6	271:10,11,15	9	205:12 207:12
6 192:2	271:18,21	9 228:22	217:6 218:22
600,000 88:15	272:2 289:15	383:22	222:6,7,9
608941 2:2	289:22 348:23	9-10 229:4	223:7 224:5
3:13 6:25 8:7	382:14 383:13	9/10 173:11,12	232:16,18,21
25:23 53:10		90 194:22	241:14 263:11
237:13		903 3:5	264:23 276:18
608941's 54:18		99 39:17	282:7 286:8
62 3:5		9:24 281:7	289:23 298:13
6th 162:8		9th 18:5 19:2	303:10 328:3
196:15 207:17		196:14 381:8	357:9,15
315:14 316:8			359:13,17
317:18 331:23			365:15 371:18
383:3			377:22
7		a	
7 2:18 7:10		a.m. 2:13 6:4	absurd 366:12
161:15 211:10		19:2	ac 336:10
211:10 305:8,9		a1 290:25	acceptable
349:16		abilities 214:10	42:11
7,000 108:9		ability 357:10	accepting
7.13 252:6		able 9:24 10:2	336:17
7.2.2 209:5		10:6 35:19	access 26:14,23
7.5 292:7		68:2 202:14	34:9 38:8
7.5b 344:12		253:22 262:21	53:17 55:8
70 161:14		314:14 342:14	61:17 67:18,20
163:10,10		369:10	68:4,11,12,13
7000.1 290:25		above 82:11	68:15,18,25
719 373:17		174:12 181:12	69:5,10,12,13
75,000 105:16		194:20 380:6	69:23 74:13
106:4 107:25		abruptly 56:4	77:5 78:4,18
7500 175:17		absolutely	78:21,24 79:6
7th 201:22		87:14,17 91:15	79:12,15
267:10,16		112:13 113:10	117:24 118:3
		150:9,11	120:3 123:9
		156:17 157:2	173:7 198:3,4
		162:14,16	

[access - actually]

Page 6

198:8 201:15	99:4 109:19	accounts 53:18	acted 54:21
201:16 230:23	113:20,21,24	54:4 65:20	acting 23:4
231:6 254:16	114:9 115:9	69:18 73:21,22	251:16
256:6 257:22	118:4,13,16,17	74:11,16,19	action 7:17 9:6
258:9 259:11	118:19 119:12	75:3,6 76:5,7	14:3,7,14
259:12,19,24	121:5,9 133:23	76:20,24 77:14	346:3,22
260:2,11,11,18	147:22 148:12	77:17,25 78:4	385:17
261:4,5 263:9	148:12 149:2	80:4,19 89:15	actions 57:15
263:11,13	149:18 150:6	93:12,13 98:24	190:18 235:3
265:24 269:4,9	161:5 175:16	122:20,22	265:7 302:25
269:15,22	178:11 179:6	147:4 150:3	active 74:7,12
270:12 271:23	180:3 181:10	196:23 199:3	74:25 75:11,21
272:3 274:16	198:11,22	201:19 212:8	77:7
278:5 280:14	199:2,5,7	230:24 231:7	activities 198:4
280:22 281:3	201:15,16	254:16 259:2	319:9
287:12,13	259:8 287:12	259:20,23	activity 57:16
321:13 355:3	323:15,19	265:25 271:23	76:23
372:11 373:16	342:12 343:10	274:16 282:18	acts 207:25
accessing 150:2	372:3 373:16	321:14 323:18	209:12 212:5
accident	373:23	343:11 371:19	218:8 223:7
330:17	account's	371:25 372:22	372:17
accidentally	115:12	373:21,22	actual 27:14
355:16	accountant	accurate 9:14	actually 17:18
accompañed	23:5,17 27:14	11:4 76:13	18:8 30:23
4:23	30:14 373:18	203:10 301:18	38:12 43:12
acordance	accountants	304:3	52:7 102:16
213:19	26:12 30:20,24	accuse 255:7	106:7 108:22
account 58:7	31:2 36:7	acquiesce	118:21 139:15
67:23 69:11,15	accounting	304:19,20	153:24,25
69:25 73:25	23:21 24:23	acquiescing	164:13 199:21
74:9,13,25	30:21 101:17	306:18	220:18 222:19
75:14,19,20	124:14 146:11	act 139:15	222:22 223:11
77:3,7 79:2,3	167:18 260:10	299:17 344:13	224:19 236:13
79:12,16 80:10	364:8 370:19		245:9 266:22

[actually - ahead]

Page 7

268:10 277:10	239:6,10	affirm 317:6	agreed 5:10,13
278:2 287:11	279:17	affirmation	5:16,20 28:21
287:12 297:16	admitted 52:6	301:3,8,10	96:12 162:12
305:6 329:15	248:13 344:2	302:22 382:23	215:22 218:19
331:6 332:5	ads 97:7	afford 161:22	241:10 261:16
344:23,24	advantages	283:4	262:6
ad 45:25	103:15	afforded 15:8	agreement
adam 135:12	advice 307:11	afternoon	80:14 103:5,7
196:11,20	307:13 308:24	238:17	107:17 153:16
197:18 198:9	309:7 310:3	agencies	153:18 191:9
199:22 200:11	advised 303:2	221:11 223:18	191:11,13
329:14 331:18	303:14 304:4	agency 353:22	213:21 215:2,5
340:20 341:10	306:17,18,20	ago 12:15	235:2 241:7,21
342:5	323:8 384:20	25:12 28:18	249:15 255:4
add 269:8,14	affairs 192:7	33:12 52:4	255:16 274:18
269:17	192:15 193:14	63:15 84:7	276:16 292:5,8
added 269:20	204:14 214:13	115:21 135:13	295:15 299:18
270:10 279:11	214:23 381:19	144:13 182:3	347:18,20
279:20	affect 245:3	190:25 219:3	358:13,24
addition 19:6,9	377:14	219:12 256:7	agreements
51:9 72:6	affecting	282:14 297:5,6	136:16 216:14
292:17	188:13	297:6 305:17	232:3,6 249:7
additions	affidavit	317:19 333:23	agrees 310:25
169:20 176:17	307:10 308:23	349:11 350:14	ah 103:4
address 268:4	309:4	367:6	ahead 57:15,17
268:12,15,16	affidavits 59:12	agree 6:11	57:23 59:14
279:12 308:8	88:15 278:19	116:10 157:7	82:21 90:16
addressed	318:9	157:10 189:13	91:3 125:6
267:22 311:21	affiliates 19:16	218:18 236:13	134:21 173:21
354:15	19:17	238:7 276:16	173:23 179:2
addresses	affiliation 59:4	280:6 301:24	182:3 183:11
193:23	affiliations	311:2 368:23	183:13 184:12
administrative	7:24	369:12 373:10	205:6 211:21
19:14 221:10			218:16 230:5

[ahead - answer]

Page 8

233:3 234:16	allegedly	alternatively	angled 110:12
249:21 250:12	177:14,15	252:18	annualized
250:16 253:2,5	178:2,19 182:9	altman 257:19	105:24 107:8
253:10 256:18	alleging 141:24	261:19 311:24	107:22
263:6 264:12	allen 3:8,10 8:3	313:11,21,22	answer 4:8,12
264:14,23	9:5 76:4	314:3 320:11	4:17,17,21,22
266:23 270:24	131:25 250:2	321:5 323:4	4:23,24 10:15
283:8 285:6	278:16 320:10	341:11,22	11:20 15:11
286:25 287:17	336:18 338:16	alvin 19:12	20:13,15,16
288:6 309:18	346:8 360:19	amazing 48:15	21:17,19,19
airbnb 60:10	allocated 15:13	263:15,23	28:3 31:6,22
106:13,17,20	53:4	amen 264:10	34:4 36:9,25
106:20 107:9	allow 135:21	amend 203:22	37:5 39:12
107:15 108:12	196:9 308:5	amended	40:16 52:19
108:18 109:2	370:3	198:11 203:21	58:10,13,14
110:5 111:20	allowed 106:16	213:23 255:4	60:14 61:13
111:21,22	148:2,3,4	273:22,24	64:17 67:19
113:15 114:7,7	157:20 221:22	292:6	82:12 85:10,11
115:4 117:17	235:14 256:10	amendment	85:13,13 88:4
118:12 119:12	309:15 316:17	213:23	88:19 89:6
119:21 266:23	318:10 346:18	america 334:19	90:5 92:22
airports 162:21	347:8,14 355:2	americas 3:18	100:17 103:20
aishlinn 3:15	357:14 373:9	amount 15:12	109:8 110:20
8:6	373:11	28:18 158:15	110:21 111:11
al 6:17,21,24	allowing	171:23 173:13	115:13,13,16
7:3	337:24 362:4	175:16 176:20	117:16,25
ala 345:10	allows 363:19	178:12,24	122:14 123:5
alerted 26:11	alongside	179:21 194:7	126:13 127:19
allegations	163:15	196:18	127:21 128:7
124:4 143:3	altered 203:23	amounts 28:15	130:21 132:12
179:15 310:15	203:24 204:6,8	99:7 141:11	134:20 135:14
365:17	204:9,10 302:8	andrew 261:18	137:14 140:9
alleged 230:9	302:9	296:15 298:21	140:12 141:19
366:2			142:3,16,22

[answer - arch]

Page 9

146:10 147:16	127:16 130:22	appear 211:9 347:8,15	approve 54:16 269:7,13 315:4
166:23 170:19	325:20 345:18	appearance 7:21 8:12	approved 330:14,19
174:6 180:25	378:19	appearances 7:23	approximate 101:4 116:25
181:14 188:23	anticipated 23:11	appeared 346:2	approximately 13:7 15:21
202:25 203:3	anybody 8:11	346:21,25	83:25 95:17
215:25 221:3	15:24 38:19,22	357:18	96:16 99:16
223:3,5 247:6	88:21 118:11	appearing 8:4	107:25 156:9
247:7,16,18	125:20 128:23	18:13	284:17
248:3 286:7	197:6 220:7	appears 24:2	april 262:4
292:21,24	349:18	153:15 154:18	arch 1:4,5,5,11
294:13,17	anymore 70:19	172:6,9 173:17	1:12,13,20,21
307:15,19	75:22 159:7	187:14,17	2:6,6,9 3:17
308:15,20	182:2 183:8	194:25 195:5	6:24 7:3,4 8:9
325:5 326:8,10	333:13	229:15 278:16	8:17 12:4,12
341:3 348:12	anyone's 47:23	279:4 301:12	23:6,18,22,23
356:14 360:20	anyway 118:24	301:13 314:8	24:21,25 25:4
362:9 364:14	154:18 162:10	356:6,10	25:5,6,7,7,9,11
364:22 365:2	199:20,20	applicable 23:10 231:24	27:2,2 28:7,8
366:22 369:10	224:25	232:3,5 249:3	28:19 31:5
370:3 374:7,17	apart 358:9	249:6	49:13,14 50:18
375:9,14	apartment 86:21 92:24	apply 4:9	50:23 51:6,23
376:15	93:20 94:21	appointment 51:25 52:22	51:25 52:22
answered 4:20	95:22 96:3,4	233:16 234:5	53:17 54:10,10
5:6 10:21	96:14 97:17	382:3	56:15 57:25
20:12 21:16	99:15	appropriate 58:16,18,21,24	58:16,18,21,24
69:11 114:4,24	apartment's 94:7	4:9 5:18 36:23	59:21 61:23
215:15	apparently 107:12 177:14	360:14,14	62:2,24 65:20
answering 40:15 74:6	179:10 180:5	361:19 371:11	70:8,10,24
137:15 138:3	appeal 218:6,8	appropriately 71:4,6,9,12	71:4,6,9,12
167:5 364:10	317:15,17	65:5	72:2,6,12,15
365:23 378:22			
answers 11:15			
100:2 110:20			

[arch - asking]

Page 10

73:20,23,24	242:15 251:15	53:16 55:7,15	137:24,25
74:10,14 78:5	251:18 252:8	59:5 72:17	138:9 142:24
81:4,5 82:5,6,8	252:18 253:11	234:23,25	147:18 157:24
82:16 86:7	254:16,17	235:5,8,18,21	158:10,20
88:5,9 89:14	255:3,12,12	235:22,23,25	161:25 162:2
93:7 102:6,13	259:2,3,8	236:7,20,21	163:25 174:19
125:23 140:11	271:17 274:17	239:15,15,19	175:25 177:10
143:11,11,17	274:18 275:16	239:21 241:20	177:18 202:9
143:21,24	275:20 276:3	242:11,13	210:16,17
144:5,9 145:19	276:10 287:14	261:3 264:11	215:11 229:20
145:20 146:6	288:15 289:12	argument	230:2,3 260:5
146:16 148:20	290:6,23 292:5	221:12	260:7 261:14
150:20 153:2,2	297:9 300:9	ari 358:12	261:15 270:5
153:15,21,23	303:9 304:8	article 4:10	271:5 272:12
154:10,13,25	305:13,13	articles 255:14	280:16,24
155:11 157:17	313:18 314:12	articulate	305:6 316:22
164:23 166:25	316:21 322:16	152:16	316:24 326:19
167:16 170:10	336:23 342:2,2	asked 20:11	330:13 333:21
172:17 174:2	342:4,4,11,11	21:15 24:4,18	334:11 337:19
174:23 192:8	342:23 343:5	28:6 35:22	341:4 358:5
192:16 194:11	343:11,12,14	42:6 60:11	359:23 361:20
196:25 197:2,9	343:20,22	61:22,24 64:9	365:22
197:19,21,21	344:16,25	64:12,16 69:7	asking 9:7
198:14 199:4,8	345:9 352:22	69:14 71:8	22:12 25:21
199:10,19	358:14 364:9	76:5 78:14	34:2 36:24
200:21 201:4	366:3 370:19	83:21 84:15,20	39:14 40:3
213:10,18,21	370:20 371:3,4	88:18 90:9,14	60:12 78:12,13
214:14,23	371:5,7 373:6	91:11 95:2	83:11,12 90:4
215:2,4 216:14	381:20 382:4	106:20,21,23	109:9 110:17
223:25,25	384:11,11	110:4 114:23	127:15,17
233:17 234:6	arch's 59:5	117:12 120:19	132:10 134:25
236:2 239:16	343:8,17	122:18 123:3	135:5 171:12
240:4,6,10,10	areh 30:22 31:5	130:2 131:16	172:11,14
240:17 242:12	52:23 53:4,6	133:4,18	180:20 186:7

[asking - authorizations]

Page 11

202:21 222:20	224:2 303:4,10	attacks 70:2 279:24	audio 6:9 august 60:3 92:11 106:23
222:23 244:3,4	303:22 306:11	attempt 148:23	108:15 109:15
244:10 247:11	316:18,21	attendance	109:21 154:3
247:12 249:13	assign 289:19	4:15	162:6 190:18
253:24 273:23	assignee 188:2	attended 242:3	196:14,16
274:9,12 277:8	188:8	attention 19:21	201:8,22
286:4,6 294:2	assigning 190:6	22:21 23:2	205:16 206:7
294:7 297:25	assignment	65:15 169:4,15	207:16,17
307:7 320:21	81:2 174:22	171:18,20	213:6 216:25
321:23 322:3	186:20 190:5	173:9 176:15	217:8,22 286:3
325:18 327:12	assignments	176:17 178:3	286:22 287:3
328:3 335:20	188:25	178:21 179:16	292:2 293:6,13
341:13,14	assignor 188:8	193:3 194:2	293:15,21,23
348:9,13	assigns 188:8	204:13 208:24	293:23 294:18
351:14 365:5	association	234:17 289:25	295:5,12,14,15
366:24 368:11	57:19	290:3 302:21	295:18,20
376:16,21	assume 106:5	351:8 372:7	296:5,18,24
377:21	368:7	attest 97:14	297:8,18,19,21
asks 71:22	assuming	attorney 4:12	298:4 299:8
228:16	346:12	4:21 5:4 7:25	322:25 339:8
aspersions	attached	14:19,23 31:18	382:19
366:7	256:25 257:6	37:6 240:17	authored 279:3
asserted 23:6	269:16 278:17	263:15,24	authorities
308:23,25	356:18,21	281:2 284:8	221:10
assess 204:11	357:5	286:12,13	authority
assessments	attachment	307:8 313:14	282:10 347:7
188:3	289:6 356:24	313:20,22	371:11
asset 70:16	attachments	343:12 362:13	authorization
80:21 130:24	206:23	attorneys 3:4,9	231:24 248:22
277:21,24	attacked 94:16	3:13,17 5:20	authorizations
assets 82:2 83:2	94:24 95:9	5:22 170:16	249:3
83:10 85:8,9	197:14,16	309:21 345:9	
158:8 160:24	attacking 56:2	345:16 370:4	
214:14,23			

[authorize - bank]

Page 12

authorize	232:12,17,19 231:15 289:19	146:24 147:11 147:13 152:5	baked 257:20 balances 54:22 240:13
auto	38:14,15 93:13 159:14 159:17 160:15 161:4	243:21 244:4,6 244:7,11,13 245:6 246:8,10 246:13,15	ball 335:8,15 336:7
automatically	39:7	247:14,18,21 247:24 249:24	band 218:8 334:12
available	28:6 28:8 89:25 90:8,13 133:23 136:10,12 145:16 152:2 200:24	250:5,7 251:11 251:22,25 253:6,8 254:7 254:9,20 255:17,20,22 333:5 349:15 354:8,11	bank 1:9 6:19 39:22,23 46:10 46:23 53:18 62:9 65:19,19 66:8 67:8,9,15 67:22,23,24 68:3,8,9,18 69:11,15,17
avenue	3:9,18 126:10,15 128:9 139:9	awareness 247:13	backdate 103:8
avi	261:19	ay 200:14	background 30:21
avoid	24:15 210:9		backwards 87:23 290:18
awarded	342:22		bad 92:7
aware	14:15 22:18 26:13 28:17 80:4 82:9 136:2 137:21 176:10 176:12 213:14 214:3,4 215:17 215:19 216:3 216:19,20 217:10,11,21 219:17,19 227:24 228:3	b b 4:4,10 12:9,9 153:13 381:2 babaev 12:6 babeav 12:8 back 33:20 37:21 48:21 53:8 76:3 84:23 98:25 100:13 101:7 104:25 106:8 109:17 114:16 114:18,25 115:2 117:9 124:8 137:19	backwards 87:23 290:18 bad 92:7 123:25 133:20 161:6 207:25 209:12 212:5 217:4,5,5 219:7 310:21 319:15,16,16 344:12 372:9 bailey 196:12 196:20 197:18 200:12 323:3 340:20 341:10 341:24 342:6

[bank - believe]

Page 13

175:16 176:19	172:18,21	bar 57:19 115:24 183:19 243:7	290:21 311:13 316:20
178:6,11,23	174:2,9 192:8	bare 319:6	behalf 1:11,12 8:4 23:4,18
179:5,20 180:3	192:16 193:15	barely 130:22	31:4 122:24
181:10 186:24	206:12,16	barrier 95:10	147:3 198:13
187:13 198:22	235:2,6,9,18	based 28:11 73:3 142:23 143:2 362:10	200:19 286:14 296:9 347:2,9 357:19 358:13
201:15,16,17	236:15,15	basis 4:13,23	behavior 220:23 221:8 376:9,10
202:7 212:8	239:14,18	baseless 367:7	belief 206:23 297:8 306:15
231:6,10,25	240:5,11	basically 48:13	believe 12:2,10 12:15 15:15
249:4 254:16	241:12 242:11	88:8 97:19	30:11 36:21
263:17,25	248:15 261:14	bates 176:16	39:24 43:4
267:20 270:12	261:22 262:14	bathroom	49:19 61:16
270:22,23	265:15 271:17	276:22	63:10,16 67:2
271:23 272:11	271:22 276:4	bear 21:23 66:4	67:3 73:7,10
274:16 275:10	288:3,10	184:5 191:23	73:10,12,16
280:16,18,22	289:12 290:24	225:3 233:8	74:24 75:21
282:18,21	291:2 296:12	273:15	76:4 77:13,15
287:12 321:13	296:14 297:11	beautiful 92:15	77:21,22 79:25
371:19,25	298:20 299:7	334:10	84:11 97:4,24
372:3,5,6,8,10	299:12 303:3	bed 240:12	98:4,23 104:3
372:10,21,24	303:12,15,23	begged 344:9	105:5 106:8
384:12,13	303:25 304:5,8	beginning 7:24	107:19 115:24
banking 152:25	304:15,17,19	23:23 27:17	119:13,14,17
168:8,11	304:21,23,23	104:22 110:2	122:11,12,13
381:10 384:10	305:8,13,14,19	163:25 204:25	129:10 143:22
bankruptcy	305:21,22,24	banks 168:14	144:8 147:2,7
74:3,10 81:6	306:9,14 309:6	211:5 259:13	147:11 148:22
82:6,16 83:3,3	314:23 316:15	231:24 249:4	
83:8,14,14	316:20 320:19		
85:6,20 86:2,3	322:16 323:5,7		
92:10 108:14	344:17,21		
111:18 125:23	345:5 362:18		
130:17 170:11	381:20 382:22		
170:14 171:2,6			
171:9 172:17			

[believe - bought]

Page 14

148:25 149:20	bet 321:20	blame 352:25	47:17,21 51:25
149:20 166:21	bets 284:19	blames 329:19	53:24 60:8,20
172:18 174:3	better 108:18	blew 147:10	61:2 101:24
192:21,23	160:25 161:18	blocked 123:19	255:13 258:10
193:3 196:15	187:24 221:6	239:13,18	258:12,15
204:6 205:22	336:20	blood 385:17	259:2,7 260:4
207:8 212:25	beyond 101:12	blowing 85:24	261:11 262:11
227:6 273:16	106:13 190:4	blown 55:25	275:20
273:22 278:7	191:15	board 25:18	boone 3:12 8:6
287:9,10	bh3 12:6,9	bolivia 318:24	209:22 319:5
297:23 298:18	bias 219:10	bond 218:6,7	born 145:6,6
298:18 299:3,3	biased 284:19	228:16	borrower 1:13
302:6,7,9,18	284:20	booked 87:7	1:21 51:2,2,2,3
303:21 309:3,6	big 46:4 124:14	bookkeeped	51:4,5 71:16
313:23,24	327:8,11	62:4	72:24 73:6,9
323:14,20	bill 84:20 93:5	bookkeeper	73:15 76:20
324:7 339:10	132:22 177:8	35:17 38:20,23	77:12,19,22
341:23 342:2,3	189:15,25	40:24 51:12	85:18 346:20
344:6,25 345:2	331:7 373:22	56:16,25 57:4	346:20,21
345:2 360:13	billion 26:6	58:2,16 59:2	358:23
362:12 377:6,7	bills 55:6 84:20	60:3	bottini 3:15 8:6
378:4	88:24 89:2,9	bookkeepers	bottom 169:4,8
belive 200:22	93:9,10 120:17	36:8 39:13	169:9 205:3
bell 268:8	131:17 133:3	50:19 59:3	273:5 278:14
345:12	148:10 149:4	62:3	288:17 289:18
belonged 343:6	156:6 177:12	bookkeeping	290:14 305:7
belonging	177:19 240:21	30:19,25 32:6	bought 48:14
65:20	240:22 241:3	35:7,15,19	97:15 102:18
ben 358:11	bit 87:25 267:7	36:17 37:11	104:4,5,5,9
benefitted	298:22 369:24	42:2 45:18,19	106:6 124:11
327:18	bitty 26:5	55:10,21 60:5	124:13,24
best 69:13 97:8	black 366:20	61:25 62:19	130:18 155:11
269:19	blacked 286:24	books 31:10	158:2 160:10
		38:12 43:25	160:23 161:3

[bought - c12]

Page 15

164:23 190:13 327:9,13 329:15,21 bow 287:6 box 195:11 boys 336:23 brad 61:11 bragg's 19:12 brain 208:14 breached 224:3 break 11:11 34:18 35:4 76:15 104:15 116:25 117:8 151:23 210:7 210:20 285:14 340:2 breaking 11:10 252:20 breast 319:12 breslow 240:17 briefed 296:16 briefing 298:20 briefings 299:12 briefly 367:24 briefs 300:16 bring 35:25 36:21 81:20 95:25 97:13 112:24 173:19 220:18 236:3 bringing 111:15	broad 17:15 broke 208:2 209:4 252:16 broken 249:21 broker 111:4,6 111:8 112:2,7 112:15 115:3 119:5 337:16 337:17,18,20 broker's 112:21 brokered 128:25 brokers 110:11 112:16 119:4 127:5 brooklyn 3:10 126:16 128:10 139:10 brother 158:7 159:25 160:2 210:5 318:19 319:15 338:9 brothers 72:4 brought 89:20 277:2 332:4 bucket 72:20 343:6 bucks 329:24 budget 88:11 144:5 building 349:21,22,24 352:15,19	354:20,22 355:3 buildings 348:5 348:22 349:5 351:23,25 383:10,11 built 333:6 334:13 bull 189:12 bullet 331:11 bullied 330:8 331:11 bullshit 59:10 346:9 355:9,10 bummed 336:8 bumper 330:17 330:18 bunch 169:6,13 188:22 193:21 309:16 business 26:6 41:15,18,22 43:5 52:24 55:17 56:3,3 59:9 121:6 148:12 152:7 153:10,14 155:5,7 156:12 159:10 164:14 196:2 214:13 214:23 276:18 277:7,24 338:19,22 339:3 357:25	361:3 377:9 378:5 businesses 53:16 152:23 160:16 busy 208:23 button 40:13 buy 38:25 125:14,17 154:25 155:7 160:23 328:24 333:13 334:11 337:23 buyer 109:4 119:3 buying 124:25 159:8 327:15 333:15 c c 3:2,6,14 4:4 18:22 45:7 49:23 70:16 107:19 360:10 380:2 385:2,2 c1 18:3,4,19,19 381:8 c10 238:19,20 238:21,22 382:5 c11 243:10,12 250:17 382:6 c12 250:14,18 382:8
--	---	---	--

[c13 - card]

Page 16

c13 253:16,18 382:10	c3 168:4,8 381:10	111:10 120:11 130:20 136:13	cameras 336:22 canada 353:24 cancel 161:8 cancellation 164:18
c14 256:13,14 257:4,5 382:11	c30 332:14 c31 334:24	155:25 182:23 223:22 224:9	candidly 97:11 candy 350:2 capacity 77:24 capital 36:5 136:13,21,25
c16 262:17,18 262:25 382:13	335:2 383:8 c32 348:4 383:9	240:22 263:16 265:2 269:18	240:23
c17 267:2,9,13 382:14	c33 348:19,21 383:11	270:5,6 280:15 281:23 285:6	caption 198:13 car 39:2 101:18
c18 272:19,22 272:23 273:3,4 382:15	c34 350:22,24 383:14 c35 355:7	330:7 349:25 361:6,7 366:16	101:18,19,22 108:23 157:7 159:10 161:14 161:15 163:6 220:24 277:2,4
c19 278:7,9 382:17	c36 355:23,25 383:16	38:10 39:21 68:23 72:21	277:9,20,23
c2 18:8,9,21 22:2 65:16 375:19,20 381:9	c4 184:19,20 185:5,22 381:12	110:23 112:17 112:22 121:17 123:2,10 130:3	326:13,16
c21 283:10,12 382:18	c5 185:5 191:25 192:3 381:14	149:3 153:10 159:20,21,25	328:13,15,17
c22 286:19,21 382:19	c6 211:9,11,12 381:21	160:14 174:14 192:12 223:22	328:20,21
c23 287:21,24 289:8 382:20	c7 225:4,20,21 c8 228:21,23	263:25 318:19 325:17 331:2,5	329:3,4,15,18
c24 300:23 301:2 382:23	c9 233:10,13 381:24	335:25 337:17 337:18 338:3	329:21 330:10
c25 311:16,18 383:2	ca 52:4 cahoots 208:18	360:15 calling 136:22	330:12 331:6
c26 315:13 383:3	calculate 105:12	136:25 calls 47:18	331:13 332:3,5
c27 319:22,23 383:5	calendar 48:7 call 29:24	112:20 121:24 130:4,21,22	332:5 333:10
c29 332:12,16 383:6	38:13 68:23 81:21 99:18,18 106:9 108:5	240:23 333:9 337:20 camacho 43:15	333:13,15 334:8,11,12 336:9,17 337:3 337:23
			card 39:6,20 46:11,12

[cards - chassen]

Page 17

cards 162:24 373:20 care 45:15 151:17 154:15 171:14 215:12 223:9 260:22 316:3 336:25 338:15 careen 233:11 career 300:8 carefully 202:23 243:24 245:23,24 246:12 298:19 carry 89:17 189:4 cars 155:18 156:3,8 157:15 159:8 162:21 163:5,15 277:25 278:3 327:4,23,24 329:19 331:10 334:17 338:4 cart 345:11 cartagena 318:23 carter 235:11 235:16 236:10 236:11,12,14 237:21,22 238:5,6,9,9 317:21	case 12:2,4 13:6,24 17:24 19:15 52:14 194:23 196:7 200:6 206:16 208:15 221:13 222:3 283:3 286:10 298:20 340:12 341:16 350:3 386:2 cases 208:23 368:17 cash 27:8 63:22 98:13 200:23 casting 366:7 catanni 107:19 catch 60:25 63:21 catching 60:23 cause 4:20 122:23 154:7 209:25 225:14 226:4 227:10 228:24 229:12 229:15 230:7,8 233:15 234:3 253:19 272:24 273:9 274:4 278:18,20 282:13 292:17 295:10 299:15 299:15,16 361:12,15 372:19 376:18	381:23 382:2 382:10,15 caused 92:14 118:8 123:13 130:9 144:22 299:14 336:5 353:13,14 354:3 371:18 causing 61:6 65:12 cautious 97:12 ceo 139:17 certain 20:23 54:17 71:21 159:2 189:16 194:21 certainty 91:18 certified 351:23 certify 380:4,8 385:10,15 cetera 26:17 38:4 47:18 72:20 101:25 167:6,6 196:6 373:4 chain 279:2 280:3,22 282:2 282:6 283:17 283:18 315:14 315:19 359:2 383:4 challenging 16:8	chance 159:12 185:23 276:22 276:23 change 10:5 103:5,7 239:21 297:7 324:10 386:5 changed 11:6 83:2,3,4 85:8,9 108:16 259:14 259:16 274:19 274:21 336:9 changes 10:7 86:4 changing 100:8 161:17 channels 342:12 chapter 305:7,9 charge 5:22 52:15 188:5 chargers 163:7 charges 188:4 charging 163:9 chase 79:25 80:2,3 153:3 168:22 169:5 169:12,16 173:5 353:24 384:13 chassen 1:9,11 3:9,23 6:18,20 8:4 9:6 25:16 30:10 53:8,14
--	--	--	--

[chassen - claim]

Page 18

53:20 54:13	207:13 209:13	246:16 319:15	chris 107:19
55:12,21 57:5	209:14,21	cheating 228:9	circle 48:21
58:3,14 59:22	210:15 212:5	280:7 318:3	circulate 46:6
60:9,14,16,17	213:7 214:5	check 15:19,20	circumstance 29:24 357:22
60:21 61:15	215:7,23	46:14,22 48:10	circumstances 15:9 71:25
62:17 63:12	216:10 220:16	63:7,9,17	circumvented 242:4,5
65:10 66:10	223:12,15	105:6 106:10	circumventing 222:8
67:10 68:9,21	230:12,16	110:23 135:15	citizens 67:9,23
77:4 78:3	231:5,14,22	144:4 150:23	69:15 74:25
79:15 85:23	243:25 244:25	194:19 196:24	79:5,16 98:23
88:6,14 89:16	248:6,20,25	268:10 270:8	99:11 153:3
97:13 99:23	250:7 254:15	272:9 298:9	169:24 171:22
100:3 106:15	255:12 262:5	299:2,11	173:12 175:10
106:19 107:10	265:21 267:23	301:21 324:8,8	175:15 176:19
107:17 108:17	272:10 274:15	324:15 342:3	178:6,11,23
109:17 110:3	275:19,25	344:21 359:22	179:5,20 180:3
111:9 122:15	280:13 281:20	367:9	181:10 256:2,3
122:17 124:13	281:21 282:17	checking 62:9	267:20 275:8
124:23 126:3	283:4 287:3,11	checks 99:9	384:12
127:3,6,7	291:21,24	195:11	citrin 26:17
128:19 131:17	292:16 298:23	child 94:18	49:15
132:19 133:16	303:7 306:7	111:17 318:15	city 7:10
133:23 136:2	319:9 322:8	318:16,16	349:22
136:23 137:12	323:8 326:24	335:10,22	civil 4:5 224:2
137:20 144:12	326:25 327:2	336:12	302:25
149:16,17	336:20 347:22	chime 134:5	cjc 219:5
153:17 154:17	349:24 358:8	chip 180:9	claim 342:16
157:23 158:2	361:2 363:9	choice 200:13	342:17,18,19
159:6 161:7,16	365:18 386:2	choices 241:5,5	342:20
162:11 163:2	chassen's 51:21	242:7	
163:15,19	82:20 89:4	choose 29:11	
173:2 182:14	113:20,21,24	chop 328:2	
182:17,25	114:9 118:4	chose 135:20	
190:14 205:14	230:23 244:18		

[claimed - comes]

Page 19

claimed 218:2	343:3 363:7	close 49:12 164:12	collected 92:23 98:19 119:9
claims 234:15	374:7	closed 74:24	collecting 86:17
clarification 12:7 49:22 68:14 69:22 79:13 137:18 151:19 159:3 200:9 226:2 240:15 242:2 307:16 325:19 331:4 349:19	clearly 5:8 89:4 232:22 278:5 296:15	closest 59:22 closing 328:14 clueless 329:19 cluster 373:24 coat 157:23 client 52:4 53:21 56:2,2 56:10 65:3	collective 92:21 223:24 373:15 collectively 372:23 college 47:19 47:20,22
clarify 76:2 135:3 354:23	83:18 89:10,14 100:9 103:5,6	cohen 19:15,23 20:3,6 21:3 215:22 217:14	colluded 207:24 318:11 collusion 222:7
clarity 35:10 50:22 74:8 165:14	103:7,14,18,21 115:12 120:16 121:5 130:19	218:14,20 219:9 220:7 221:15,19,19	223:24 318:12 339:15 347:18 347:21
clause 297:13 299:18	133:11 142:16 142:22 151:20	221:21 222:2 223:19,21,22	colors 191:13 come 28:10
clean 162:22 221:21	187:5 222:5 240:11 241:10	229:16,25 235:19 237:8	42:25 46:9 57:10 88:7
cleaning 163:13	250:6 305:11 305:11 307:8	239:13 249:18 250:19 251:5	98:7,24 106:14 136:22 152:5
clear 4:13,23 18:18 20:22 21:3 26:24 47:10 51:16,19 54:2 55:20 64:22 70:20 79:3 86:9 92:9 99:24 110:10 119:19 127:4 137:4,8 234:8 234:8,13 266:20 316:19	321:10,12,12 321:14 322:10 362:13 365:9 365:17 366:4,6 366:8 369:18 370:7 372:18 clients 46:7,7 209:11 223:23 223:24 361:11 clock 43:3 355:18 367:3,5	273:14 279:13 317:13 354:19 363:16,18 364:18 366:13 372:9 382:9 cohen's 236:16 239:11 279:11 coincidentally 112:20 collect 38:4 117:2	185:5 198:20 198:24 199:4 218:11 228:6 238:11 266:7 280:12 284:13 323:24 334:24 338:10 343:16 comes 37:25 83:16 146:20 262:25 278:8 320:8 323:22 349:25

[comfortable - confidentiality]

Page 20

comfortable 377:25	communicati... 13:5 222:15	compared 26:5 348:18	completely 362:7
coming 76:18 134:18 148:16 148:18 152:2 162:20 189:5 191:25 217:17	commute 167:8 companies 70:8 71:9 88:24 150:10	compass 112:9 112:10 119:5 compensated 48:2,4	compliance 4:6 75:17 91:25 350:4,6
commenced 241:6 302:24	company 12:9 24:22 51:24	compensation 314:15	compliant 118:23
comment 66:21	52:2,3,8,11,12 80:8 86:25	complain 239:12,17 280:18,25 332:9	complicated 110:20,21
commentary 153:7 282:11	139:17 150:14	complaint 183:19 219:8 220:21 242:25 243:7 329:22	complied 161:18
comments 4:16	174:24,25	333:20 348:5 350:25 351:16	complies 321:22
commercial 1:2 7:7 126:9,14 189:6	197:15,16 198:15 199:15	351:19 352:6 353:18 383:10 383:14	comply 321:10 322:10
commission 386:25	201:5,10 209:11,15	complaints 220:6 221:9,25 222:4,11	computer 286:20 287:23
commit 337:7 369:22	212:9,12 213:21 215:3	223:19 224:9 329:5 331:14 336:11	concept 203:25 246:11
committee 243:3	230:19,24,25 231:6,25	complete 4:25 9:14 11:3	concerned 89:8
committing 369:3,17	240:19 252:24 252:25 253:2	203:14,15	concerning 206:14 363:10
common 71:19 71:23 72:5 73:4	266:15 274:25 277:21 315:4,5 318:7 322:22	204:4 274:16 276:2 302:4	concluded 379:14
communicated 13:20	336:19 337:5 342:12,21,21	completed 24:7 63:6	concludes 378:25
communicating 5:4	344:5 347:17 353:4,14,15,20		conduct 4:2 5:2 218:25 219:6 243:2
communication 5:3,5,8 42:25 313:10	360:6 361:9,13 371:2 373:17		confidential 312:5,9,12
			confidentiality 4:18

[confinements - controlled]

Page 21

confinements	consent 5:5 155:24	construction 44:22	continued 108:17 259:11
confirm	63:18 207:21 299:2	156:21,22,24 158:17,19,20	continues 154:2
	313:24 368:3	159:10 160:11	continuing 138:5
confirmed	215:6 234:25	consult 366:17	contract 91:10
	219:2 363:17	235:8,20 237:7	100:19 119:6
confirming	252:3 276:15	consultant 's 31:20,23	125:14,17
	212:11	304:20,21	127:9 128:16
confirms	220:3	consultants 37:10 165:16	161:6,10
conflicted	316:18,22	consulting 80:25 174:21	contracts 188:13
	340:22	contained 26:3 234:25	contractual 91:6 154:12
confusion	372:4	contemplating 242:10	contractually 134:3
conglomerate	53:7	contempt 208:5 208:7,9 229:21	contrary 234:22 235:10
conjunction	12:16 26:10	230:3 232:23	control 25:22
	102:13 106:18	232:24 243:18	26:13 58:4
connect	122:4	243:25 246:14	61:14 72:13,14
	280:23	contending 101:23	72:15,21,23
connected	281:3	consistent 82:25 106:5	73:2,5,12,14
	connection	167:12	135:10,18
	62:22 186:10	consistently 59:11	138:12,12
	187:11 192:7	constantly 294:11	145:9 152:7
	192:16 206:16	constitution 235:13	198:14 290:15
	234:23 381:19	constitutional 236:17 237:25	318:7
connectone	75:9,10,16,17	21:6 175:2 254:14,23	controlled 27:3
	75:22 76:22	255:11 274:15	50:19,23 51:6
	77:4 186:24	275:19,25	56:15 57:25
	187:13	308:3	58:6,16 71:5
			143:12 150:21

[controlled - court]

Page 22

153:2 254:17	copied	222:12	212:24 217:8	246:23 299:7
255:13 259:3		283:24 321:3	218:21 227:25	306:17,18,20
370:20 384:11	copies	173:5	229:7 239:19	307:7,12,13
controller		260:9	244:8,14 264:3	308:24 309:5,8
49:25	copy	5:21	282:3,12 286:3	310:3,14,17
controlling		13:24 50:12,15	293:7,7 313:6	323:7 357:21
5:18 57:7		261:2 262:10	342:25 345:22	362:18 384:20
controls		278:18 352:2	346:22 351:24	counsel's
70:9		359:2 379:9	357:8 364:13	303:19,20
71:10,11	core	230:19	380:9	count
143:18 146:7		corner	corrections	290:13
146:17 364:13		169:9	10:3	290:15 340:25
366:4 370:21		172:13 173:20	correctly	counter
conversation		212:18 273:5	194:19 325:21	6:21
63:16 307:6	corporate	corresponden...	283:25 284:5	counterclaim
conversations		290:5,23	corrigans	1:15,18 6:23
6:7 161:16		corporately	123:10 129:16	countless
315:7		98:22	130:2 133:4	20:21
conversing	correct	10:18	cos	62:15 84:16
265:2		14:3,4 15:18	160:7	123:10 129:16
convince		17:21,22 20:9	cost	270:10 275:8
132:3		21:14 28:15	275:11 282:20	countlessly
354:24		32:25 34:10	89:17 156:7	90:19
convinced		37:12,13 85:16	161:22 163:13	county
352:17		96:21 110:9	326:17,18	1:2 7:7
cooperate		113:9 117:23	costs	301:25 385:5
216:11 231:22		123:6 126:6,16	54:18 87:4	couple
248:21,23		126:21 128:11	152:14 164:21	33:5,7
249:2		153:11 155:16	196:5	course
cooperman		177:17,21	could've	4:15
26:17 49:15		199:25 202:15	280:16	17:22 124:7
coordinate		202:19 203:17	counsel	172:12 173:21
139:16		205:19,20,21	6:14	173:21 202:11
coordinating		205:23,24	7:21 8:20	236:23 237:8
137:21		206:24 207:2,9	15:23 23:7	284:3 302:13
			116:11,23	326:24
			218:24 219:5	court
				1:2 4:19
				5:12 7:6,13

[court - date]

Page 23

8:19 9:11 15:17 17:9 20:8,10,13,16 20:22 21:7,12 23:13 37:17 57:17,18 59:10 68:12 70:3 90:18 108:21 114:16,17 115:14,20,21 116:5 121:7 137:23 138:8 170:15 171:6,9 172:22 174:9 175:23 183:12 198:9,17 199:23 204:11 205:25 206:4,6 206:9 207:21 208:20 212:11 224:13 234:24 235:7 236:16 236:22 237:8 237:12,15 238:11 240:24 245:7 247:25 248:9,14,16 252:16,20 264:17 265:15 265:23 266:10 276:24 277:7 280:3 281:11 283:22,24 284:2,6,18,23	305:6 307:17 311:2 312:14 321:11 339:12 340:5 355:4 357:2 361:5 367:14 368:13 372:8 373:4 court's 226:24 232:8 286:11 321:11,22 322:10,11 courts 242:23 284:20 cousin's 241:23 cover 83:13 87:3,4 89:2 149:8 152:14 152:21 163:12 196:5 coverage 342:22 covid 218:3 coward 317:21 cows 136:22 266:7 cpa 31:3 cpas 30:23 cplr 4:10,14,22 5:15,17,18 cracked 330:9 crafted 263:15 263:24 created 79:4 155:8,8,10	credible 300:12 credit 39:6,19 46:11,11 169:24 171:22 173:12 176:19 178:6,23 179:19,19 credibility 91:2 creditor 194:3 194:16 creditors 193:21 194:22 credits 180:6 cried 333:11 339:21 crime 206:13 criminal 103:22 115:11 crook 318:4 crr 2:20 385:8 385:24 crushed 191:6 191:7 cry 264:17 266:11 culmination 81:16 cure 354:8 current 166:17 currently 125:12 126:19 128:3,8 134:14 292:9	custom 334:13 customer 328:8 329:5 customers 164:16 323:13 329:9 cute 256:19 cv 238:5 d d 4:5 49:23,24 153:13 281:11 380:2 383:19 da 19:13,13 dad 47:24 daily 379:9,11 damaged 330:18 damages 344:14 damn 317:20 317:21,22 353:4 dan 345:12,13 dana 344:22 danger 220:16 dangled 208:21 dangling 206:9 dare 282:24 dark 350:8 dash 234:14 date 2:12 15:20 18:6,11 22:17 24:19 26:16
--	---	--	---

[date - default]

Page 24

46:23 63:5	273:19 292:6	385:21 386:22	december 97:4
104:7 105:7	295:15 320:17	days 47:23	205:15 213:22
155:4 168:10	320:23 348:23	143:24 182:3	292:6 350:25
169:23 184:22	349:10,11	194:22 210:11	351:17 383:15
192:10 211:15	350:25 382:11	235:11 236:11	decide 119:21
214:17 215:12	383:12,14	316:13 320:17	223:17 236:16
216:16,18	dates 24:7	322:15,19	decided 53:25
218:13,14	196:14 198:19	349:11	108:21 112:16
228:25 233:18	228:10	dead 111:21	159:5 310:23
238:24 243:15	daughter 94:15	199:24 210:12	346:16 357:2
245:25 246:2,3	94:23 95:9	235:15 291:16	decides 347:11
249:22 250:21	daughter's	deal 135:23	360:17 361:18
253:20 256:17	330:10	238:16 253:9	decision 119:20
262:20 267:11	david 47:6,8	269:21 310:9	215:4 225:9
271:19 273:2	207:20 339:23	333:8	227:21 234:24
278:11 283:14	day 33:16	dealership	235:20 237:9
286:23 288:4	45:10 89:13	156:5	243:13 252:3
293:13,15,16	95:4,6 104:9	dealing 333:25	382:6
294:18 296:23	112:20,23	dear 359:21	decisions 237:6
298:4,17 299:9	139:16,16	death 295:8	declaration
301:5 308:12	151:2,7 158:22	debt 87:6 89:5	206:12 288:19
311:20 315:15	163:10,11	187:25 188:21	299:21
319:25 332:18	178:12 181:24	189:21	declare 206:25
335:4 348:7,24	184:13 201:21	debtor 291:13	dedicated 36:8
349:13 351:3,7	240:23 245:16	291:24 292:2	40:24
356:3 368:5	245:19,20	292:10	deemed 5:17
386:3	293:9 298:7,14	debtor's 192:6	291:25
dated 173:11	299:20 316:12	192:14 288:15	default 120:8
176:18 178:4	316:14 318:3	291:11 381:17	121:11,16
201:7 213:22	328:4 340:5	debtors 195:14	129:2,6,19
213:23 216:24	353:23,25	204:16 205:8	177:6,13,17
217:3,7 251:8	365:10 366:7	288:20	189:11,23
256:15 257:9	373:25 374:9	deceit 61:11	265:6 279:9
267:15 271:9	377:18 380:19		

[defaults - dialogue]

Page 25

defaults 56:6	definitively	358:9	described
defect 4:13	154:5 187:18	deposed 11:23	39:16 40:4,12
defend 323:4	299:5	57:13 190:15	45:20 74:22
341:5	delivering	209:19 210:13	describes
defendant 2:10	30:12	368:8	292:16 319:8
6:15 7:5	demand 50:15	deposit 147:9	describing
244:18 302:23	152:25 321:16	147:15 174:14	40:19 145:14
363:8	371:23	180:17 328:7	description
defendants	demonstrates	328:10,11,24	334:17 381:7
1:10,18,23 2:7	143:6	deposited	deserve 157:3
6:19,24 7:3	denied 243:18	181:4,11	desk 336:21
defended 191:5	243:25 246:14	deposition 4:4	destroyed 61:7
defense 295:15	denying 252:2	4:7,8,8,11,18	347:16
307:12,14	department	4:25 5:4 6:13	destruction
310:14 347:20	86:19 180:21	7:9 12:19 13:2	354:2 361:13
defined 143:12	224:4,7 348:5	13:9 14:13,18	detailed 255:14
215:4 274:17	348:22 349:4	15:18,24 16:11	details 95:2
definitely 12:23	349:21,25	138:14 183:5,6	186:6
63:18 131:8	351:23,24	184:10 307:23	determining
145:8 150:7	352:15,19	308:3,14 309:2	5:6
151:5,8 157:17	354:20,23	363:12 366:17	deterring 322:9
163:23 285:5	355:3 383:9,11	368:6 378:19	developed 13:6
299:10,11,12	depending	384:16 386:3	developing
342:4 371:15	101:23	depositions 4:2	152:17
definition	depends 328:12	4:3 5:2 318:8	deviating 125:5
50:22 157:6,12	328:25 329:4	368:16,19	devious 125:6
292:3 294:25	deponent 4:12	deposits 169:20	132:7 134:21
303:25 304:7	4:17,21,24 5:3	176:17 180:13	134:24 135:4
304:17,18,22	5:5	depth 144:17	diagnosed
304:23 305:21	depose 52:24	derivatively	378:8
305:22,24	57:14,18 111:8	1:4,4,11,12	dialogue 19:4
324:21	164:19 198:7	6:17,21 8:17	46:7 63:24
definitive	207:20 337:6	describe 330:7	298:22 314:14
212:14	339:24 354:2		

[dialogued - document]

Page 26

dialogued	13:5	278:16 314:5,7	discovery	70:17	
dialogues		directing	18:10 22:12	disposed	51:24
314:25		141:19 142:3	66:14 231:18	108:13,15	
died	333:11	142:16	238:14,16	160:3,4	
difference		direction 4:22	261:14,15,18	dissolution	241:5,8,10
316:16 322:20		51:22 55:18	261:23,24	distract	336:25
327:8,11		59:25 162:10	262:5,9,12,13	distraught	333:17
differences		210:3	265:18 313:8	distressed	160:23
236:4		directly 20:2	326:25 347:19	distribution	82:8 145:15
different	40:7	39:20 46:12	381:9	148:14	
42:4,22 43:12		149:19 154:13	discuss 15:23	distributions	256:10 339:7
43:18 62:4		198:20 280:16	16:10 70:4	district	237:12
73:2 81:3		280:17,24	discussed 16:4	237:14,17	
98:11 119:4		314:14 343:21	117:7 357:21	ditched	75:12
159:22 160:6		dirty 182:12	361:24	division	1:2 7:8
174:24 183:14		318:25 319:3	discusses	dob	350:24
199:19 236:6,7		disappeared	258:11	351:16 383:14	
239:22 255:24		94:11 281:9	discussion	docket	13:4
295:21 313:16		disaster 164:3	311:11	84:17 90:25	
314:25,25		216:21	discussions	197:22 341:7,7	
315:7 327:16		discern 335:22	26:4 66:17	341:8 359:14	
348:8 351:7		disclaimer	316:23	doctor	378:4
377:18		192:5,14	disgusting	doctors	377:24
difficult	160:11	381:16	110:12 183:3	document	18:13,16,21,24
334:14 369:24		disclose 222:17	185:11 258:3	22:5,10,11,13	
372:17,17		222:23 223:16	318:20 322:23	22:21,22 52:9	
difficulties		306:22,23	dismissal 81:5	66:3,9 144:12	
34:16		307:3 310:16	82:5,15,23	144:19 157:4	
diligently	23:8	disclosed 223:9	85:2 271:21		
30:16		342:18	dismissed		
direct	4:21	disclosures	27:10,19 90:24		
221:3 362:9		168:18	90:25		
directed	17:17	discount	disorder		
21:7,13 54:7		326:14 327:10	376:19		

[document - dupe]

Page 27

157:18 168:7	290:5,9,19,22	333:17	330:15 350:10
168:21 171:19	291:4 293:24	doh 262:4	358:17
175:3,6 176:15	294:25 295:2,7	doing 31:14	download
184:19,21	296:6 299:23	32:5 33:4 34:3	67:24 68:2
185:6,24 186:6	300:13 301:7	38:17 40:6,10	downloaded
186:8,13,20	301:18 302:4	42:22 46:16	67:21 68:7
187:9,10,15,22	302:15,16	47:4 60:9 62:7	downstairs
187:23 189:9	303:25 304:11	109:2 120:22	160:8
192:17,19,22	304:12,24	121:6 126:25	dozen 357:23
193:8,11	305:5,8 312:13	127:2,12	drama 334:6
202:13,18	312:18 313:2	153:25 156:12	336:6
203:8,10,12,14	322:18 347:24	164:5 173:23	draw 53:11
203:16,25	349:2 351:9,15	182:4 209:12	dreamland
204:7 211:11	351:22 381:12	209:13 261:16	177:12
211:18,24,25	documents	266:22 268:23	drive 95:7
212:15 217:21	13:4,8 23:3	317:4 319:3,16	dropbox
218:5 225:3,9	52:3 62:22	321:15 336:19	259:12 274:25
227:4 228:13	64:4,6,15,19,20	337:24 363:22	275:5 370:24
229:9,11	71:14 73:17	364:6 365:8,10	373:3
233:20,22,24	89:13 93:2	366:14	dropping
234:10 239:3,5	157:21 172:7	dollar 26:6	162:20,21
239:8,13,24	173:4 182:20	36:14 46:25	drugs 376:5
243:17,22	186:10 189:2	62:19 111:22	due 28:5,15
244:5 250:11	196:8 203:23	136:24 137:2	29:4 98:19
250:14 252:13	204:23 207:19	327:19 329:2	151:24 188:4,5
253:17,23	212:6 261:3	dollars 24:8	188:9,10,10
254:8 256:24	296:15 300:7,9	53:15 54:17	189:23,23
262:22 273:8	300:18 304:22	72:10 81:11,22	202:11 237:6,9
273:13 274:3	312:21 346:18	83:8 92:24,25	373:9
278:8 286:17	357:14,16	93:22 98:14	duly 8:23 380:5
286:19 288:7	384:2,4	101:11 144:4	385:12
288:11,18,23	doe 39:3	146:22 148:10	dupe 317:7,10
288:24 289:4,5	dog 26:5	162:24,25	337:4,11
289:7,11,14,20	333:11,11,15	163:11,11	

[duplicated - email]

Page 28

duped 208:24 317:8,10 352:18 duplicated 368:22 duress 339:22 duty 156:5 dying 333:11 333:17	earned 89:22 93:18 110:7 earth 116:16 183:11 280:9 easier 41:12 45:4 east 51:3,4,5 71:15,18 72:23 73:6,8,14 76:20 77:11,19 85:17 133:13 139:4 331:20 331:21 346:14 351:18 353:11 354:5 358:23 easy 16:7 eat 150:13 185:16 eaten 367:6 eating 365:8 effect 5:11 213:11 227:14 232:10 372:20 effective 216:12 298:24 effectively 93:7 163:8 effort 24:12 189:24 eight 65:24 134:12 164:5 166:3,7 193:7 328:23	either 46:9 82:20 92:3 95:24 104:5 126:20 147:8 198:25 252:18 294:11 343:24 357:18 electric 93:4,5 93:10 94:2 163:7 electrician 350:11 354:9 electronic 67:18,19 260:19 286:11 312:14 electronically 69:24 email 18:5,25 19:22 20:2,9 21:4,5 29:17 29:19 30:3,7,8 34:7,10,13 42:23,24 45:4 133:5,17,17 209:14 230:24 231:9,10 238:22 256:3,6 256:14,25 261:8 262:19 263:7,10 265:21,25 266:9 267:10 267:15,19,25	268:4,10,12,15 268:16,19,20 269:7,13,17 270:4,11,24 271:2,9 275:9 275:12 278:10 278:15 279:11 279:12 280:3 280:13,22 281:5,25 282:2 282:3,6 283:6 283:13,17,17 284:11,14 285:25 286:10 286:22 287:2,7 293:10,17 294:22 296:3 298:5,6 306:10 311:19,21,23 311:25 313:9 313:25 314:5 315:14,19 317:25 319:24 320:5,6,22 322:8 352:13 352:23 356:2,5 356:8,12 359:2 359:8,10 370:25 372:4 373:5 381:8 382:5,11,13,14 382:17,18,19 383:2,3,5,16 384:5
--	--	---	--

[emails - et]

Page 29

emails	ends 169:16 enforce 4:19 enforceable 235:3 enforcing 322:9 engage 265:4 engagement 27:9 197:2,20 197:24,25 198:12 199:22 200:2 engine 334:15 english 41:25 enjoined 248:6 251:15 252:2 231:23 248:21 249:2 254:14 254:14 265:24 321:12	35:12 49:5 50:2,3,19,24 51:7,12,21 55:3 56:15 57:25 58:16 62:4 63:3,4 71:3 72:4,16 72:22 81:17 82:9 86:5 143:12,18 144:12 145:4 145:21 146:7 146:16 150:19 153:2 199:19 200:20 254:17 255:13 259:3 274:17 275:20 276:3 357:19 370:20 371:7 384:12	195:14 196:5 entries 40:6,10 equally 298:10 equity 291:11 291:13 292:10 358:15 equivalent 327:15 eric 279:19 282:5 errata 386:1 erratic 220:22 221:7 376:8,10 error 4:13 256:4 275:10 especially 61:9 esq 3:6,10,14 3:15,19 establish 141:4 established 362:20 estate 1:5,14,21 2:6,9 3:17 7:4	
emotions	117:3			
employed	23:5	ensure 231:5	274:17 275:20	
employee	32:2 32:5,24 33:2 46:24 59:23	231:23 248:21 249:2 254:14 254:14 265:24	276:3 357:19 370:20 371:7 384:12	
employees	35:21 37:8,10 41:2,6,22 45:11 59:21 61:23 62:3 72:10 164:22 165:16,19 166:13 325:12 325:23 327:5 361:7,8	enter 320:18 entered 187:11 226:6 227:10 244:8,14 246:9 247:25 251:12 254:8 278:2	entitled 186:20 189:20 233:25 260:5,6 288:11 290:22 343:24 344:3,14 366:5 376:24	
	entire 24:22 69:24 275:4 289:6,7	entitlement 188:20 entity 25:7 79:19 80:22	251:18 276:9 304:24 318:14	
encompassing	25:10	entirely 72:18	89:14 143:17	
ended	128:20	entities 23:6,19 24:5,9 25:6 27:3,10,16	144:7 145:11 148:20 149:5 150:21 174:13	

[ethics - existed]

Page 30

ethics 200:7	5:21 9:2 363:8	excused 298:2	251:2 253:13
europe 334:18	363:9,23	execute 231:25	253:16,17,18
event 5:7 189:2	379:13 383:21	249:4	256:13,14,21
190:7 265:13	385:11,13	executed 73:18	257:3,4 262:16
295:8,11,19	examine 236:4	207:4 289:15	262:18 263:2,3
296:4,10	examined 8:25	exercise 25:20	267:2,4,6,8,9
298:16	206:19	216:12	272:19,21,23
events 14:25	examining 4:24	exh 381:8,9,10	278:7,9 283:10
162:6 295:8	example 43:10	381:12,14,21	283:12 286:5
296:7 297:19	43:16 49:15	381:23,24	286:18,19,21
everybody	54:13 60:9	382:5,6,8,10,11	287:21,24
13:21 19:11	98:11 101:20	382:13,14,15	289:8 300:23
43:24 44:24	145:10,22	382:17,18,19	301:2 311:16
133:19,22	326:12 328:13	382:20,23	311:18 315:12
264:4 282:8	except 4:4,6,14	383:2,3,5,6,8,9	315:13 319:22
322:24 348:17	4:18,21	383:11,14,16	319:23 332:12
evidence 141:8	excess 151:6	exhibit 18:3,4,9	332:14,16
141:23 359:6	exchange 34:7	18:12,19,22	334:24 335:2
evidentiary	108:24 109:3	21:25 22:2	340:13 348:3,4
308:15	exchanges	30:5 65:16	348:21 350:22
exact 15:20	42:23 335:14	168:4,6,7,8	350:24 355:7
25:13 96:18	335:15	184:2,19,20,24	355:15,22,25
104:7 105:6,25	exchanging	185:3,7,22	374:22 375:4
107:18,21	152:21	191:18,25	375:16,17,18
109:16,25	exclusive	192:2,3 211:9	376:18 381:6,6
149:7 151:7	124:22	211:10,12	exhibits 16:16
155:4 296:23	excuse 57:9,9	225:5,20,21	203:15,18
331:24	68:6 196:17	228:21,23	228:6 381:4
exactly 111:17	214:18 269:3	229:4,6 233:10	exist 71:20
116:4 180:8	269:20 297:22	233:12,13	73:17,23
229:22 237:25	297:22,24	234:14 238:19	266:14 298:12
263:8 327:19	309:11 363:13	238:21,22	existed 58:24
examination	364:4 368:14	243:10,11,12	77:18 89:18
2:16 4:15 5:14		250:14,18	

[existing - feel]

Page 31

existing 73:24	expressed 135:9 137:16	facts 16:3,4 270:22 373:13	favor 303:2,15 304:4,10,15
exists 144:19	expression 54:20	factual 180:24 180:25	favorable 306:8,14,16
exit 164:13	expressions 372:12	fair 20:3 59:19 60:2 121:25	fbi 19:11 220:7 222:2,5,15,18
expedite 379:9 379:11	extend 214:9	300:21 367:8 368:24	222:21 223:22 223:23
expense 36:3 93:25 120:21 147:15 150:22 152:11	extent 4:14 46:15 226:24 227:9	fairly 367:20 faith 189:24 216:11 217:24 231:23 238:7 238:10 245:17 248:21 249:2	february 2:12 6:4 15:18 18:5 19:2 23:7 58:5 61:16,20 83:25 84:9 91:20
expenses 62:10 62:11 86:9 93:3 98:16 101:12,14 107:16 133:6 137:25 147:18 147:20,21 343:25 344:3	extorted 97:19 330:21 extortion 148:23	fake 266:2,3,3 266:4,6,7,8	100:4 108:20 110:3,7 114:17
experience 318:18	f	fall 154:3	121:7 137:23
expert 260:25	f 8:22,22 49:24 345:4,4 385:2	false 206:13 318:10 336:5	194:6 240:2 256:15 257:10
expired 97:3 134:11	face 132:7 217:19 219:20 372:15	falsified 337:20	348:23 367:18
expires 386:25	facebook 97:7	familiar 79:19 80:8,22 172:5 186:4 195:4 322:6 335:7	381:8 382:12 383:12 385:21
explain 376:8	facial 372:12	family 47:23 72:19 94:22 95:9,20,24 140:19	fed 169:23 171:22 179:19
explaining 341:2	facilitate 216:12	far 36:2 45:11 53:12 80:17 144:11 145:13	federal 152:4 198:17 221:9 290:24
explicitly 277:12 296:3 303:18	fact 10:6 59:8 157:19 179:4 179:25 194:9 196:19 218:9 242:22 310:22	factor 298:16 157:24 158:4 277:12 310:22 355:9	fedwire 173:12 176:19 178:6 178:23 179:19 180:7
explored 357:22	324:10 363:10 363:16	feel 118:23 143:7 249:20 263:20,21	
exposed 337:10 337:12			

[feel - five]

Page 32

269:18 333:14	384:8	154:12 164:19	first 1:9 6:18
364:14 377:25	files 373:4	207:7 210:4	8:23 19:22
feeling 372:9	filings 24:25,25	241:17 270:8	22:16 25:19
feet 126:11,18	25:9 193:14	272:14 278:17	27:6 28:11
318:22,25	194:23 241:12	292:13 336:24	32:20 44:15,15
319:3,6	286:11 288:2	358:2	48:14 65:10
fell 358:9	288:10 289:12	finder 10:6	80:2 102:17
felt 19:4 156:4	306:8,14	finding 33:21	129:22,22,25
fictitious	312:15 356:18	finds 234:24	142:15 148:2
263:16,25	357:6,12	fine 35:5	149:22 172:8
fiduciary	382:21	354:13 366:23	186:2 197:24
242:17	filings 23:10,24	fines 206:17	199:8 200:22
fifteen 83:7	23:25 24:3	finish 56:11,13	201:9,20
fight 160:3	27:3 28:22	63:25 88:17	204:22 225:23
338:24	30:15,17,18	122:6 126:12	289:6 305:15
figure 49:9	final 71:21	127:23 128:6	305:17 325:4
318:14	73:19 204:3	237:18 363:14	328:8 343:16
file 104:10	351:9	364:4 365:20	349:13 351:20
203:23 224:9	finally 24:16	fire 164:10	357:3 371:17
235:18,24,25	27:22,24 61:18	247:23	371:20,22
236:15,20	108:20,20	fire 208:2,3	372:2,19,20
301:24 312:13	110:4 137:22	208:11 217:2	380:5
322:15	financial 192:7	265:4,17	fit 365:9
filed 23:11 50:7	192:15 193:13	282:13	five 45:9 52:4,5
80:17 102:5,11	204:14 381:18	firing 232:25	53:12 65:22
103:17,19	financially 7:17	firm 3:4 7:15	94:21 113:4
192:20 202:14	financials	23:22 27:15,16	116:3,8,12
203:8,20 219:4	107:7	124:14 200:8	144:6,7 167:7
219:8,13	find 23:24 28:8	344:23 360:25	167:25 205:24
235:23 236:2	34:8,21,22	firms 26:17	247:2 256:6
236:21 271:17	43:3 45:7 97:9	148:7 340:11	285:14 311:14
284:6 286:9,10	97:22 104:8	340:18 341:2	340:2 364:20
305:12 316:20	111:10 137:3	341:15 342:7,8	367:5 379:4
317:17 323:6	153:17,17,19	344:15	

[fix - full]

Page 33

fix 85:25 86:2	foreclosure	163:5 189:4 209:16,25 321:5 359:5,11	197:23 337:15 free 21:5 137:5 137:6 143:7 222:25 269:18 285:2
fixed 337:3	176:6 177:20		
floor 2:19 3:13	177:23,24,25		
flow 25:21 27:8	178:14 179:12		
flowed 148:11	181:17 182:7	forwarded 30:10	
folks 19:3,6,8 24:14 30:20,22 35:8 39:10 53:10 59:4 61:4 241:19 266:15 295:14	189:3 190:6,11 190:21 191:2,3 191:4 345:22 345:24 356:15 357:20	forwards 311:22 fought 358:8 358:16 found 97:9	friend 61:10 158:6 203:22 295:13 319:13 friends 88:13 260:24
follow 29:6 69:19 148:5 258:4 272:11 280:17 298:19 300:19	207:2 380:8	129:10 164:8 235:8,19 263:5 287:19 335:25	frome 3:17 8:9
followed	344:13	foundation 142:25	front 26:18 31:24 101:6 107:7 155:20 170:24 172:24 277:3 317:13
236:19 272:6 294:16	form 4:13	four 13:10	frozen 253:14
following 53:9 244:20 296:7 355:4	193:5,13 205:3	19:22 26:3 41:24 45:9 46:2 65:22	frustrated 337:8
follows 8:25	288:19,25	114:5 145:4,14	fulfil 95:11
283:24 291:21 302:22	289:2,6	164:6 167:7	fulfill 82:10
food 185:10	formal 91:10	248:4 285:22	fulfilling 98:4
footnote 234:18	219:8	311:9 338:25	full 32:18 34:21
290:2 291:17 291:20	format 142:24	357:24	35:2 41:7,9 42:19,20 43:6
force 5:11	357:7	fourth 68:17	44:2 47:19
213:10 232:10 247:4 248:7	214:16,25	frame 15:3 102:15 330:9	48:9,9 53:17
foreclose 190:8	226:24 227:9	framed 4:11	61:17 71:17
	228:10 283:18	fraud 206:13	72:13,13
	292:4 385:12	206:15 335:23	117:14 219:16
	forthwith	335:24 336:3,4	230:23 232:10
	153:4 384:14	337:7,10,13	261:18 262:9
	fortune 330:13	fraudulent	262:12 305:3
	forward 29:12	182:22,24	306:3 330:11
	111:3 127:18		

[full - giving]

Page 34

334:6 337:2 355:14 fully 218:25 296:16 330:9 fun 201:24 317:24 function 69:25 functioning 377:15 fund 147:22 152:6,8,12 199:8,13 240:12 343:4,7 funded 147:3,6 196:4 197:4 199:7 200:23 200:24 342:10 funding 88:9 133:24,25 153:24 197:3 200:18 324:13 funds 28:5,8,20 53:23 54:3 62:14 89:16,24 93:3,22 133:22 143:23 151:4 196:22 200:24 funny 164:14 224:12,14,15 224:19 237:20 furnished 5:21 113:7,13 further 5:10,13 5:16,20 56:9	176:15 179:17 210:4 227:7,14 230:22 302:23 321:18 362:16 374:2 380:8 385:15 furthermore 218:4	generate 31:11 46:7 gentleman 44:4 44:7 45:2 getting 88:19 125:2 136:8 159:10 188:18 202:16 268:19 312:25 ghostwrites 309:16 give 9:14 11:3 11:14 24:16 29:9 34:25 37:7 40:21 41:5,7,8,11 42:7,14,18 43:23 45:13 47:19,24 50:6 50:12,15 66:5 68:11 69:8,10 74:8 101:19,20 103:14 105:14 108:22 109:17 114:18 115:14 115:14,16,17 120:12,13,20 123:3,9,21 127:20 133:5 134:2 138:2 159:6,6,7 177:19 237:8,9 238:16 242:19 247:2,16 253:4	253:5 256:22 261:2,22 262:11,13 266:13,14 269:9,15,22 271:22 301:23 313:7 324:11 328:16,17 338:16 339:9 344:18 347:6 347:19 349:25 361:16 366:25 367:9 370:6 373:25 given 4:8 15:8 30:4,5 68:13 68:15 139:12 145:20 149:6,7 166:8 252:12 252:12 260:7 260:18,19 326:11 372:10 379:2 380:10 385:14 gives 115:24 169:6 339:14 giving 44:16 56:17,18 60:13 63:24 90:5 105:24 107:7 115:13 127:16 208:6 263:9 315:25 316:21 336:4 347:17
800-727-6396	Veritext Legal Solutions www.veritext.com	212-267-6868	

[giving - going]

Page 35

360:16,22,23	200:21 205:6	359:22 371:19	134:23 135:3
360:23 371:8	206:2 207:17	371:22,24	138:4,6,10,10
374:23	208:5,6 211:21	372:19 373:17	138:11 147:16
glitch 68:23	216:7,9 217:14	goes 43:13	147:19 148:9
global 192:3,12	218:4,7,11,16	46:12 56:5	151:16 163:4,5
381:14	219:6 221:18	173:22 278:19	168:3,17
go 6:11 16:25	221:22 230:4	297:16 328:21	173:19 175:5
33:21 34:3,12	231:9 232:22	373:14	176:3 181:14
36:13 39:2,6	233:3 234:16	going 6:3 9:6	181:15 183:23
39:20,21 42:3	237:21 242:18	9:17 11:9,14	184:2,6,18
43:7,12,18	246:4 249:21	12:10 15:11	185:2,4,17
44:19,19,24	250:12,16	18:3,7,8 21:21	191:13,19,21
45:11 52:7,7	253:2,5,10	21:22 29:3,9	205:5,5 209:15
52:18 55:13	256:7,18	29:14 32:25	209:23 210:6
57:15,17,23	258:10,21	37:6,7 40:5	211:8,9 215:9
59:14 63:24	262:13 263:6	43:17 48:18	215:14 217:18
65:5 76:3,16	263:21 264:12	50:14 52:15,18	221:2 224:15
82:11,21 83:23	264:14,17,23	55:13,13 56:13	225:2,5 228:12
86:23 87:22	265:14,20,20	56:25 57:2	228:14,20,21
90:15 91:3	266:10,23	58:9 62:20	233:9,10 237:5
93:7 95:4,6	270:13,15,24	63:8 66:24	238:18,19
100:5 104:24	272:18 276:21	67:6 80:13	239:9 241:20
116:15 125:6	282:23 283:2,8	92:12,13 94:21	243:10 246:7
132:3 134:21	285:6 286:25	94:23 99:25	250:10,13,14
137:19 149:22	287:17 288:5	100:2,13 101:7	252:8 253:12
152:3 164:10	289:13 291:20	102:9 105:14	254:3 256:12
167:13 173:21	296:11,14	105:14 106:8	256:18 262:15
173:23 179:2	309:17 310:7	107:25 115:19	262:16 264:16
180:10 181:5	311:5 319:7	115:20,22	266:21,25
181:14 182:3	338:18 342:13	116:11 117:13	272:18,19
182:24 183:3	343:9 347:23	117:25 119:6	280:11 282:17
183:11,13	347:25 352:14	124:15,21	283:18 284:15
184:12 185:12	352:18 354:20	131:25 132:2,2	284:22 287:21
193:17 198:9	354:25 357:2	132:3 134:3,23	290:17 298:21

[going - h]

Page 36

299:4 307:25	277:14 317:9	313:14 314:2,6	guilty 317:6
308:7 310:14	323:6 338:9	314:7 344:22	gun 331:12
310:16 311:15	355:8 371:21	gross 81:14,15	guy 44:6
311:17 315:3	goodbye 52:5	81:23 82:4,14	107:20 110:22
315:11,12	182:21 214:11	84:24 86:6	111:14 112:24
319:21 332:11	google 329:13	93:18,23 99:13	133:20 157:25
332:12,13	gorgeous	99:14,21	160:12 183:7
334:24 335:22	334:10	100:15,21	200:4 208:15
339:25 340:23	gotten 30:7	101:2,11,21,25	238:12 283:3
340:24,25	46:25 132:4	105:8,16,17,22	285:2 319:3
341:3,5 348:2	158:7 261:8	106:4 107:22	322:25 329:14
348:3,11,17	268:14 276:15	109:4 319:10	333:17 334:6
350:13,22	government	319:11	guy's 166:18
355:7,22	353:22	grounds 5:7	329:17
359:11 361:16	graduated 45:8	group 19:3	guys 44:18
361:25 362:3,8	grand 100:10	133:17 359:21	160:9 197:14
362:25 363:8	334:13 358:8	grown 318:13	197:16 198:16
364:19 368:10	358:10	333:12	201:19 207:23
368:18 370:2	grant 215:24	guarantee	207:24 235:16
374:4 378:12	216:2	71:24 282:23	236:10 241:15
good 6:2 8:2	granted 69:23	guaranteed	261:20,23
9:4 19:23	225:24 226:20	88:5 89:11,12	262:9 297:14
25:25 53:24	226:23 227:9	143:22 144:10	302:10 319:4
63:8 66:18,19	244:19 246:16	guarantor	330:16 331:25
76:18 130:25	246:19 281:22	182:15 191:8	344:4,4 347:18
136:5 161:19	great 34:20	240:20,21	349:23 361:10
163:2 164:20	61:8 113:5	347:5,14	371:19 372:23
189:24 191:19	184:4 310:25	guess 81:21	373:6 374:17
216:11 217:24	greater 298:19	238:13 241:18	h
231:23 238:7	greatest 28:12	300:10 345:8	h 38:11 49:23
238:10 245:17	green 328:16	guidance 59:18	49:24 70:16
248:21 249:2	328:18	269:16,23	381:2
263:21 265:5	griffin 311:23	272:7	
276:23 277:13	313:10,12,13		

[ha - hey]

Page 37

ha 180:8	210:11 219:18	he'll 54:14	254:13 308:15
half 87:8	233:2 241:19	118:18 153:6	323:2 355:16
166:22 208:14	241:23 271:12	158:2	363:6 367:21
257:20 357:23	298:17 299:8	head 12:14,22	368:8,20 369:6
372:6	299:10 306:3	33:15 42:8,20	held 2:17 100:3
hampton	317:18 323:14	44:10,14 58:5	100:7 120:16
331:20,22	323:20 372:2	60:9 71:7 77:4	127:3 311:11
hamptons 97:6	happening	81:8,9 84:14	hell 344:8
108:3	158:22 328:13	90:2 95:18	help 14:9 31:2
hand 47:19,24	363:3	96:18 104:7	47:2,3 134:4
101:8 169:9	happens	105:3,11 107:6	195:23 314:12
172:7 212:18	265:13 295:7	109:23 117:18	329:17 332:3
247:4 260:21	332:9 334:21	120:18 125:12	342:16
385:21	338:3	126:2 131:15	helped 46:20
handful 329:8	happy 19:19	137:9,19	47:15 80:25
handle 51:23	300:20 307:18	138:23 150:17	266:19
358:5	338:8 374:18	167:23 187:16	helpful 154:2
handled 51:22	hard 43:3	195:5,21	163:17
51:25 55:2	60:25 89:22	203:19 245:22	helping 163:18
hands 44:17	95:20 123:23	246:13 295:24	309:12 345:9
47:4 221:20	124:2,3 150:2	300:14 329:11	hereinbefore
278:2 326:3	166:24 167:9	331:17	380:11 385:12
333:7	167:17,19	headed 162:9	hereon 188:7
hanging 206:3	184:25 204:10	health 378:9	hereto 5:18,21
206:5 339:12	208:9 242:7	hear 100:9	hereunto
happen 54:19	330:7	237:5 244:2	385:20
83:15 116:5	hardest 97:5	375:12	hertz 161:5,7
208:10 271:14	harmony	heard 7:5 70:2	161:10,17,24
295:9 309:13	360:15	158:25 171:5,7	162:12,13
319:5	hated 160:4	218:17 238:3	164:11,14,15
happened 74:2	hayman 207:20	368:2 375:17	164:16,20
75:24 90:11,12	339:23	hearing 184:14	hey 36:11
92:11 152:8	haynes 3:12 8:6	214:6 230:11	372:21
162:4 194:9	209:22 319:5	238:6 254:11	

[hi - identification]

Page 38

hi 268:22 311:15 338:7	7:4 8:10 12:12 197:10,19	hour 11:10 261:17 262:7	83:7 95:7 101:10 139:18
hide 50:13 152:19 224:20	251:18 253:11	hourly 43:2 44:6,21	164:25 165:2 166:10 167:25
high 45:8	holing 126:4	hours 13:10 15:7 45:10	205:20 210:16
higher 93:5 101:14	home 47:22 94:18,21 95:4 95:8 106:19	277:17 285:11	218:22 219:10
highest 29:11 164:4 165:4	136:22 266:7 358:20	house 51:22 62:6 114:16	264:9 358:8,10 358:17
hired 115:2 128:25 200:4 200:11,12 240:14,17 341:23	homes 360:15 honest 12:22 honestly 160:21	houses 153:10 hpr 1:12,20 50:24 57:6	hundreds 53:14 151:22 201:18 222:7,9
history 26:21 56:17,18	honor 252:15 265:16 339:10 367:15 369:2	housekeeping 307:23	hurt 118:10 319:12
hmm 10:14,23 155:12 169:18 179:8,24 231:20 267:17 267:21 288:8 312:2 356:4	honorable 19:14 21:3 229:16 238:9 279:11,12 372:9	houses 153:10 hpr 1:12,20 50:24 57:6	hurts 183:23
hoc 45:25	hope 228:22	58:4,8,14 61:17 65:21 70:14 74:15 78:17 82:15 99:22 100:15 103:3,25	hybrids 155:25
hold 142:7 168:17 169:21 193:9 204:21 225:11,12 234:7,7 273:9 308:7	353:24 368:20 hopefully 15:6 52:24 353:23	104:25 105:2,9 107:3 119:24	i
holding 61:17 82:21 109:18 251:16	horrible 216:21 216:23 329:14	120:15,25 121:13,19	icloud 316:6
holdings 1:5,14 1:22 2:6,9 3:17	hostage 61:17 82:21 100:3,7 108:24 109:18 114:16 120:17 126:4 127:4	122:9,24 123:17 125:12 131:14 132:17 149:23	icloud.com. 311:22
		hr 319:2	idea 80:15
		hundred 54:17 70:11,13,20,23 72:3 81:22	157:22 163:3,6 317:4 318:17 366:10
			identification 18:6,11 168:10 184:22 192:9 211:15 228:25 233:18 238:24 243:14 250:20 253:20 256:16 262:20 267:11 272:25 278:11 283:14 286:23

[identification - injection]

Page 39

288:4 301:5	imported	174:4	188:11 197:16	individually
311:20 315:15	impossible	84:3	304:25 349:24	1:3,11 6:16,20
319:25 332:18		266:18	income	357:18 359:20
335:4 348:6,24	imprisonment		81:18 83:16,16	individuals
351:2 356:3		206:18	85:22 97:25	37:23 40:2
identify	improper	4:20	123:24 162:23	46:13 97:3
idiots		110:16 241:24	incompetent	98:10 193:14
ignores	improperly		264:8	ineffective
133:22		56:10 124:6	inconsistent	287:14
ignoring		198:5 352:13	20:17	information
257:22		352:14,15	indemnities	23:9 26:22
ii		353:4 361:9	342:15	64:25 84:21
iii		371:6	indemnity	120:12,13,18
illegal	improving		283:5	120:21,23
100:10 143:3		156:14	index	121:4 131:20
266:19 353:22	inaccurate		1:7,16	134:17 206:20
illegally		321:19	2:4 7:8	206:24 223:14
113:16 353:5	inactive	74:21	indicates	224:23 230:25
illegitimate		80:10 321:17	indicating	233:5 254:6
270:21	inappropriate		44:18 47:4	297:7 299:22
illustrate		280:4	54:20 291:7	337:15 352:24
illustrated	incident	95:20	307:5	353:19 365:19
13:15 345:10		334:4	indicta	366:3 373:25
imaginable	include	4:13	individual	384:2,4
330:12		17:23 78:25	31:15 32:14,17	initial
immediately	included	19:5,9	43:20 44:12	342:8
11:7 79:6		201:12 235:9	62:3 94:13	initially
274:14 275:18	includes	17:21	96:20,23	340:21
275:24 328:14	including	7:22	106:18 107:17	initiated
impact		17:19 19:11	288:20 344:20	242:25
importance		20:18 21:10	individual's	initiative
28:13		55:20 62:17,17	288:2,10	314:15,20
important		62:18 63:4	382:21	jected
27:25		136:23 165:15		181:19
				181:22,23
				jection
				218:6

[injunction - irregularity]

Page 40

injunction	insured	134:14 137:10	interning	45:9	72:11,16,22 144:11 145:3
212:4,13	intent	80:18	interns	37:10	145:21 147:22
244:19 287:16	intention	63:22	interposed	4:6	157:5 163:6
353:7			interpretation		195:14 252:25
inquiries	66:20,22		303:18,19,20		253:9 274:17
24:16 275:12	157:17		373:10		
inquiring	intentionally	66:18 125:24	interrupt	5:4	275:20 276:3
268:24 269:3,4			138:6 269:12		324:17,21
ins	intentions	315:8	interrupting		371:5,7
77:2 146:20			11:17 64:10		
180:9	interaction	33:8	interruptions		investments
insane			118:8		71:12 144:15
332:25	interest	70:11	interval	48:12	157:19
333:7			intervention		investor
insisted	70:13,24		19:5		135:22
151:21			intranet	351:10	investors
instinct	135:10 137:17				72:19
296:24	149:9 152:13		introduce		72:20 359:16
instructing	188:7 204:19		314:13		359:18,21
364:21 365:2	instruments	207:16,17,19	introduced		371:5,9
376:15		210:17 281:24	286:18		invitation
insurance	291:11,13,24		introducing		138:19
94:2	292:10 309:23		184:2		invited
131:3,7,12,14	339:6		invested	72:10	59:16
131:22,24	interested	7:18			59:17
132:14,16,25			72:12 155:15		invoice
133:15,18	74:5 385:18		158:12,14,16		84:4
134:5 135:6,11	interests		investigate		involved
136:8 138:23	144:14		353:23		139:13 158:5
139:5,10	interfere	4:16	investigated		261:20 272:6
152:11 196:6	interim	211:13	183:18 218:21		340:21,24
315:4,5 336:3		212:16 226:25	224:20		348:10 367:25
336:5 337:5,7		232:8 233:25	investigation		369:13
337:10,13,14		381:21	183:14		involvement
337:16,17,18	intern	36:10	investment		154:4,6 367:21
342:16,21,21	internet	287:13	63:4 71:3 72:7		involving
					369:5
					irregularity
					4:14

[irrelevant - j]

Page 41

irrelevant	13:1 14:1 15:1 310:23	110:1 111:1 112:1 113:1	178:1 179:1 180:1 181:1
irrespective	19:1 20:1 21:1 86:4 130:16	114:1 115:1 116:1 117:1	182:1 183:1 184:1 185:1
irvington	25:1 26:1 27:1 291:22	118:1 119:1 120:1 121:1	186:1 187:1 188:1 189:1
israel	343:13 343:19,21	31:1 32:1 33:1 34:1 35:1 36:1	190:1 191:1 192:1 193:1
issue	25:13 49:10 52:23 53:19 56:9 64:24 94:15 178:17 192:25 236:17 237:10 261:7 281:9,23 298:23 362:14 372:14,16,25 378:9	37:1 38:1 39:1 40:1 41:1 42:1 43:1 44:1 45:1 46:1 47:1 48:1 49:1 50:1 51:1 52:1 53:1 54:1 55:1 56:1 57:1 58:1 59:1 60:1 61:1 62:1 63:1 64:1 65:1 66:1	122:1 123:1 124:1 125:1 126:1 127:1 128:1 129:1 130:1 131:1 132:1 133:1 134:1 135:1 136:1 137:1 138:1 139:1 140:1 141:1 142:1 143:1 144:1 145:1
issued	52:11 349:16,17,20 350:3,19 358:22,25 359:7,15	67:1 68:1 69:1 70:1 71:1 72:1 73:1 74:1 75:1 76:1 77:1 78:1 79:1 80:1 81:1	146:1 147:1 148:1 149:1 150:1 151:1 152:1 153:1 154:1 155:1
issues	49:8 65:12 123:20 188:9 260:21 350:4,6 368:2 371:3 377:25	82:1 83:1 84:1 85:1 86:1 87:1 88:1 89:1 90:1 91:1 92:1 93:1 94:1 95:1 96:1	156:1 157:1 158:1 159:1 160:1 161:1 162:1 163:1 164:1 165:1
issuing	371:14	97:1 98:1 99:1	166:1 167:1
itty	26:5	100:1 101:1	168:1 169:1
j		102:1 103:1	170:1 171:1
j	8:1,22 9:1 10:1 11:1 12:1	104:1 105:1 106:1 107:1 108:1 109:1	172:1 173:1 174:1 175:1 176:1 177:1
			238:1 239:1 240:1 241:1 242:1 243:1 244:1 245:1

[j - jeffrey]

Page 42

246:1 247:1	314:1 315:1	j2023 238:5	386:2
248:1 249:1	316:1 317:1	jackasses	jared's 55:6
250:1 251:1	318:1 319:1	352:12	148:22 156:15
252:1 253:1	320:1 321:1	jackson 45:3	156:21,24
254:1 255:1	322:1 323:1	january 97:5	190:18 208:25
256:1 257:1	324:1 325:1	110:2 178:5,22	214:9 241:22
258:1 259:1	326:1 327:1	179:6,18,22	282:22 319:12
260:1 261:1	328:1 329:1	180:4 181:3	347:11 356:13
262:1 263:1	330:1 331:1	314:2 363:5	jarred 3:9
264:1 265:1	332:1 333:1	jared 1:9,11	jason 261:19
266:1 267:1	334:1 335:1	3:23 6:18,20	341:22
268:1 269:1	336:1 337:1	8:4 9:5 22:7	jc 80:5
270:1 271:1	338:1 339:1	48:13 58:13	jeff 44:20 61:12
272:1 273:1	340:1 341:1	78:3 114:9	110:25 116:7
274:1 275:1	342:1 343:1	123:20 153:24	127:14 132:9
276:1 277:1	344:1 345:1	154:9 155:15	138:17 183:9
278:1 279:1	346:1 347:1	164:7 173:2	217:15 220:4
280:1 281:1	348:1 349:1	190:14,16	220:19 224:18
282:1 283:1	350:1 351:1	205:14 210:15	228:17 231:12
284:1 285:1	352:1 353:1	220:24,24	233:4 241:25
286:1 287:1	354:1 355:1	240:13,16	258:22 266:24
288:1 289:1	356:1 357:1	241:19 252:9	268:16,23,23
290:1 291:1	358:1 359:1	262:5 263:15	294:12 307:3
292:1 293:1	360:1,10 361:1	263:23 266:21	309:14 314:16
294:1 295:1	362:1 363:1	267:23 269:2,3	336:8 338:7
296:1 297:1	364:1 365:1	269:17 271:22	355:12 361:14
298:1 299:1	366:1 367:1	278:4 285:4	jeffrey 1:3,17
300:1 301:1	368:1 369:1	291:21 299:13	2:6,17 3:4 6:13
302:1 303:1	370:1 371:1	319:9,10,15	6:15,22 7:2
304:1 305:1	372:1 373:1	344:9 346:16	8:16 65:24
306:1 307:1	374:1 375:1	346:18,23,25	81:3 174:23
308:1 309:1	376:1 377:1	358:16 359:9	197:21,25
310:1 311:1	378:1 379:1	359:13 371:22	199:2 204:17
312:1 313:1	380:1	372:15,18	205:10 207:5

[jeffrey - jp]

Page 43

251:15 252:8	89:14,18 93:7	271:17 274:16	job 297:12
289:16 291:12	102:5,13	274:18 275:15	joel 19:14 21:3
379:2 380:15	125:23 140:10	275:20 276:2	229:16 249:18
386:2,3,21	143:11,11,17	276:10 288:15	250:19 251:5
jeremy 3:19 8:8	143:21 144:8	289:12 290:6	273:13 279:11
200:5	144:11 145:3	290:23 292:5	279:12 382:8
jersey 94:16	145:10,18,20	297:9 303:9	john 24:11
95:6	145:21 146:6	304:8 305:13	26:19
jessica 32:21	146:16 147:20	305:13 309:22	john's 102:25
34:23 359:24	147:23,23	313:17 314:12	johnny 38:25
jj 1:4,5,11,12	148:6,6,20	316:21 322:16	39:3
1:12,20,20 2:6	150:20 152:25	342:2,4,10,23	join 124:23
6:24 7:3 8:17	153:2,15,21,22	343:5,7,11,12	158:10
23:6,18,23	154:10,13,25	343:13,17,20	joined 252:10
24:3,21,25	155:11 157:17	343:22 344:16	joint 295:14
25:7,8,11 27:2	164:23 170:10	344:25 345:9	347:20
27:2 28:7,8,19	172:17 174:2	358:14 364:8	jonah 335:6,8
31:5 49:4,13	191:11 192:8	364:12 366:3	jose 44:4,24
49:14 50:18,23	192:16 194:11	370:19,19	jotting 374:15
51:6,21 52:22	196:25 197:21	371:3,4,5,7	375:6,8
53:5,16 56:15	199:4,7,10,19	373:5 381:20	joyce 323:22
57:25 58:15,18	200:21 201:4	382:4 384:10	jp 64:23 65:9
58:21,24 59:4	213:9,18,21	384:11	69:12 74:2,4,8
59:21 61:23	214:14,23	jj550 75:13	74:17,21,23
62:2,24 63:4	215:2,4 216:14	jjny 50:25	75:3,7 76:6,8
65:20 70:8,10	223:25 233:17	65:22 70:23	78:11,16,19
70:24 71:3,5,9	234:6 236:2	75:5 78:20	79:25 120:12
71:12 72:2,6	239:16 240:4	85:14 100:21	121:24 123:10
72:12,15,16,21	240:17 242:12	102:23 129:2	123:19,20,21
73:20,23,23	242:15 251:15	130:9 131:3	150:3 153:3
74:10,13 78:5	252:8,18	345:22 346:2	168:23 198:6
80:21 81:4,5	254:16,17	jjny55 126:5	320:18 340:22
82:4,6,8,16,24	255:3,12,12	jjr's 249:4	371:17 372:14
86:7 88:5,9	259:2,3,8		372:16 373:20

[jp - know]

Page 44

373:21 384:13 js 174:14,23 jsimpson001 311:22 316:6 jss 80:7,11 174:14 judge 5:12 12:17 19:23 20:3,6 89:8 116:15 158:24 159:4 175:24 182:2,21,22 207:23 208:3 208:22 214:5 215:22 217:13 218:20 219:7,9 220:7 221:15 222:2 223:19 223:21,22 229:24 233:2 235:11,15,19 236:11 237:8 237:21,22 238:8,23 239:6 239:10,11,13 242:22 249:17 250:6,19 251:5 252:11,14 262:4 264:20 273:13 277:3,6 279:18,21 281:2 308:5,8 317:8,10,13 318:6,8 339:9	339:14 344:8 347:10 352:18 353:6 354:19 354:25 362:15 363:16,18 364:18 366:12 372:9 373:9 382:5,8 judge's 339:8 judges 19:14 judicial 177:22 177:25 191:4 218:25 219:5 243:2 321:10 345:24 july 169:23 241:23 242:4 june 158:16 242:14 junkyard 160:22 justice 220:18 224:4 justin 224:7 k	katz 329:14 331:18 keep 12:22 49:25 51:17 52:6 53:23 59:8,12,14 keyword 375:15 khan 345:12,13 kiboshes 276:20 kid 336:3 337:2 kidding 265:18 killed 124:16 kind 36:17 38:5 101:6 124:18 143:4 146:10 183:14 king 3:19 8:8,8 kitchen 202:10 knew 49:7,19 54:19 158:22 297:4 322:25 keeping 60:10 60:17,20 84:13 kennedy 24:11 24:11 25:14,21 25:25 26:19,25 30:13 48:22 62:22 384:5 kept 53:3,23 109:20 kevin 3:22 224:16 285:3	315:25 344:2 348:15 353:8 371:6,23 372:5 keys 108:22 114:18,25 347:17 kid 336:3 337:2 kidding 265:18 killed 124:16 kind 36:17 38:5 101:6 124:18 143:4 146:10 183:14 king 3:19 8:8,8 kitchen 202:10 knew 49:7,19 54:19 158:22 297:4 322:25 keeping 60:10 60:17,20 84:13 kennedy 24:11 24:11 25:14,21 25:25 26:19,25 30:13 48:22 62:22 384:5 kept 53:3,23 109:20 kevin 3:22 224:16 285:3
--	---	---	--

[know - larger]

Page 45

42:5,16,19	155:22 156:10	295:22 296:22	kristy 371:23
43:5,22 44:5	157:9 161:11	296:22 297:13	kurman 341:22
44:13,20 45:9	161:12 162:19	299:9 300:5,7	345:3
50:11 52:8	164:7,24 166:9	300:13 302:3	I
59:15 62:8	167:22,22	303:16 305:4	I 43:22 49:23
66:21 70:15	170:23 171:3,6	308:3,22	49:24,24 380:2
74:7 75:7	171:11,14	309:15 313:13	labeled 21:25
76:21 81:7,20	172:6,23,24	315:4 317:2,3	185:3 212:15
83:17 84:5,14	174:4,11 176:9	317:17 319:8	lack 123:24
84:17 95:2,5	176:11,13	320:7 321:7	lady 59:9 61:5
95:18 96:18	182:16 186:5	322:4,13 323:3	68:19 89:10
98:16,18 104:2	186:18 187:8,8	328:15 329:11	198:5
104:2,3 105:12	187:15 189:3	330:6,23	lama 68:19
106:2 107:5,5	190:19,23	331:12,18,21	267:19 269:19
107:21 108:18	195:20 198:23	331:24 332:24	271:3,21
109:20 119:5	200:5,8 203:10	333:2,5 334:7	land 326:25
120:2,7,7,10	203:16,24	336:20 338:14	334:22
121:3,4 123:7	204:8,10	339:13 341:6	landlord 97:11
123:9 129:11	205:24 206:10	342:4 346:10	97:20 154:24
129:15,21	208:10 217:5	346:11 349:23	lane 106:8
130:5 131:18	219:19 222:16	352:5,8,9,16,22	291:22
131:18 132:8	225:18 229:22	354:6,14	language 95:10
132:20,23	232:21 233:7	356:17,23	213:12
133:8,10,10,11	239:25 245:13	368:5,18	lapse 214:9
135:8,8 137:9	245:21 246:6	370:15 376:24	lapsed 214:10
138:21 139:3,6	246:18 247:6,6	378:10	215:13,13,14
139:8,12	247:7,9,10	knowing 196:4	215:16
144:19,21	251:23 252:15	knowledge	laptop 16:15,17
145:7,12 146:5	257:17 268:2	106:13 305:25	16:20
146:13 147:24	269:10 270:3	known 38:5	large 54:6
149:7,24	271:8 272:9,15	knows 16:5,6,8	larger 26:6
150:16 151:14	272:17 278:24	136:2 219:17	102:3
153:23 154:8	287:17 293:2	264:11 278:4	
154:19 155:4	294:21,23	317:5 346:6	

[late - leventhol]

Page 46

late 91:22 92:3 129:23,24 130:12 147:8	leadership 164:12 leading 99:25 100:2 115:15 115:17 258:2 355:10 laughing 224:11 law 3:4,8 4:5 148:6 152:4 210:5 310:20 310:22 340:11 340:17 341:2 341:15 342:7 344:15 366:21 laws 97:12 151:23 159:25 160:2 294:16 lawsuit 197:11 197:13,14 237:11 lawyer 17:24 130:22,23 181:25 208:14 241:3,13 246:21 272:6 319:5 322:23 343:3,5 lawyer's 300:15 lawyers 147:24 238:2 342:24 lazy 264:8	left 46:21 128:20 161:24 167:13 205:3 241:17 242:8 277:15 340:8 362:22 lear 23:20 27:13 124:15 learn 106:14 109:22 297:7 learned 190:24 191:20 lease 91:12,14 95:21,25 97:6 108:12 112:3,8 112:10 118:7 119:22 154:19 154:20 190:4 leased 94:13 112:12,13 leases 96:13 97:3 186:20 188:13,25 189:4 190:5,7 190:9 leasing 96:9 111:23 leave 53:25 54:9 97:18 161:25 162:2 162:12,13 164:6 375:25 ledger 191:3	lenders 189:20 357:25 lent 146:21 150:10,18 182:25 leslie 3:14 8:5 209:9,18 237:20 248:13 367:15 lessee 370:16 letter 23:13 120:4 197:20 197:25 198:12 199:23 200:3 201:9 206:4 lehrfield 49:20 52:25 53:17,22 54:7 55:5 leitman 196:12 196:20 197:18 200:11 340:20 341:10 342:5 len 240:17 lender 83:23 84:4,5,9,16,22 85:21 91:11 129:15,16 130:18,20 147:12,14 188:19,21 189:14 190:2,7 190:13,15,19 191:10 346:6 357:23,25
---	--	--	--

[liabilities - llc]

Page 47

liabilities	303:3 303:9,22 306:12	life's 284:25 lifted 350:13 light 328:16,18	71:6 103:2 133:5 153:7 165:11 166:17	live 54:9,11 88:9 96:12 97:9 140:18
liability	213:20 292:5	lighting 43:4 likely 196:3,7	204:16 205:10 205:14 262:24	352:24
liar	181:25 182:5	196:23 298:17 352:21 368:7	300:21 341:14 359:3 374:20	lived 276:19 lives 108:11 331:19,22
license	31:4 115:25 182:6 354:21,23,25	likes 203:22 limitation 4:19	384:7 listed 195:19 205:19 309:22	llc 1:4,5,5,11,12 1:12,13,13,13 1:13,14,17,20
licensed	183:7	192:4,13	listen 248:4	1:20,20,21,21
licenses	352:19	214:15,25	280:11 281:14	1:21,22 2:6,6,9
lie	132:7 183:23 270:21 294:10,11 322:24	381:15 limited 35:18	284:22 365:19 listening	3:17 6:23,24 7:3,4 31:24
lied	57:22 59:11 115:20 115:21 182:2,4 182:21,22	36:5 37:9 188:12 213:20 292:4 367:20	353:25 listing 276:2 lists 193:20	32:11,11,13,15 34:21 50:24,25 50:25 51:3,4,4
	183:12 199:24 199:25 207:25	143:5 178:21 185:15,18 308:4 352:17	194:2 196:11 204:17 205:7	51:5,10 65:20 65:21,21,22,22
	210:3,5,6 224:13,13,13 224:14,16	384:19 386:5 lined 358:15	literally 48:18 115:20 164:9 241:22,24	65:23,23 67:10 69:16 70:8,10 70:12,12,14,16
	240:24 282:9 318:6,7	lines 178:4,21 link 39:8	329:17,23 331:8 333:8 336:4 374:15	70:18,23 71:6 71:16 72:15,24 73:6,11,15,20
lien	188:6 353:12	list 19:18 24:5 24:17 29:2	litigants 223:20 litigation 24:15	74:16,19 75:5 76:20 77:12,20
lies	90:18 228:8 318:10	37:7 40:18 41:4,5,12 42:4	75:13 87:20 90:11 302:24	78:5,8,17,20,22 79:17,20 80:5
life	189:7 352:16 373:13	42:15 43:8 48:25 49:3,4	312:23 345:14 little 87:25	80:7,9,12,17,22 81:5 82:15,23
		49:18,20 50:6 50:10,12 67:2	108:8 158:6 191:20 267:7	83:12 84:25 85:14,18 86:13
		67:5 69:17	336:8 369:24	91:5 92:18

[llc - look]

Page 48

93:17 99:22	234:25 235:8	381:12	186:3 207:14
100:15,21	240:4 251:18	loan's 84:2	208:10 240:23
101:3 102:6,20	269:5 275:3,6	loans 75:11	297:6 299:6
102:23 103:3	275:7 288:15	141:10 145:20	333:23 362:19
103:25 104:25	290:24 313:18	149:8 152:22	longer 89:14
105:2,9 107:4	314:12 322:16	170:8,17 189:6	96:20,23
119:24 120:25	345:22 358:23	190:17,19	160:18 297:9
121:14,19	360:15,23	191:20 195:13	look 21:24
122:9,24	361:21 362:5	324:10 359:18	25:11 27:11
123:17 126:5	381:11,20	359:19	29:17,18 32:16
131:6,11,14	386:1	lobosco 163:22	32:18 33:19
132:17 140:7	llc's 67:22	165:22	34:6,12,17,17
140:14,15	llcs 140:17	local 290:25	41:9 44:10
141:16 143:13	341:17	locate 359:24	47:3 48:5,6
143:17,20	llp 3:12,17 8:7	locating 34:16	52:9,9 60:7
144:17 146:6	load 229:2	location 7:9	72:8 75:9
146:16 148:19	288:5	159:23	76:21 93:13
149:23 153:13	loaded 180:22	locked 217:25	99:6,16 100:5
153:15,21,23	180:23	352:12	104:3,8 127:6
154:10,20,21	loan 53:9 54:12	logged 38:7	131:5 134:3
154:23 155:8	54:15 75:18,23	logically	146:12 148:8
168:9,12	75:24 83:24	245:11	149:25 151:12
169:24 170:6	84:7,12,15	login 67:11	151:15 155:23
171:23 172:3	85:21,23	68:24	166:17 168:4,5
172:17 173:16	122:10 130:5	logins 61:3	168:16 169:11
174:15 175:11	130:15,15,18	logistics 284:3	171:12 173:4
175:15 177:6	145:23,23,24	logs 260:10,12	173:10,17
178:7,15 179:5	147:6,7,9	long 13:8 14:22	174:12 175:7
179:13,20	150:14 177:5	14:24 32:23	176:11 180:7,9
180:2 181:9	182:21,23,24	95:7 129:6	180:13,16,17
186:23 192:8	184:20 186:9	134:22 135:13	180:18,18,21
192:16 194:2	187:11 190:14	150:3 160:15	184:3 185:23
194:11 197:19	279:8 338:24	161:9 172:9	186:15 187:16
199:4 213:22	358:7,15	177:22,25	188:23 194:20

[look - lot]

Page 49

198:25 202:23	looked 13:4	137:7 138:17	360:18 361:14
203:11 211:17	160:22 189:5	139:19 140:12	361:18 362:2,6
213:3 225:17	198:12 299:5	140:22,25	362:10,19,23
228:5 231:10	351:6	141:7,12,17,20	363:4 364:16
232:25 234:19	looking 62:9	142:5,9,12,17	364:23 365:5
239:25 243:23	66:3 172:8	142:23 153:8	365:12,24
245:25 246:2	175:2 185:25	165:14 171:16	366:15,24
246:20 247:3	203:20 225:19	183:4,9,21	367:8,12
253:22 256:7	229:3 241:4	184:15 185:2	368:13 369:8
257:16,18	290:8 292:18	185:12 187:6	369:14,21
268:6,11,21	335:18 340:13	210:19 217:15	370:6 374:8
270:22 271:8	376:7	219:24 220:4,8	376:6,12,16,22
272:14,15,20	looks 22:11	220:13,19	377:2,10 378:6
283:6 286:4	38:22 172:4	221:5,17,24	378:15,23
290:12 291:15	177:2,4 179:8	223:3,13	lorenc's 23:13
297:11 298:18	202:25 203:17	224:18,22	lorenclaw.com
299:17 300:4,9	208:15 225:16	228:17 231:12	3:6
300:15 301:17	268:2 314:4	233:4 234:9	lose 329:25
305:20 306:5	356:25 357:2	243:4 253:12	loser 237:24
314:10 317:16	lorenc 3:4,6	254:5 258:22	lost 112:15
320:3 321:7,20	8:13,15,15	262:10 266:24	198:2 207:15
322:6 324:11	14:19 15:6,11	277:19 281:16	207:16,18
330:23 332:13	16:23 20:11,15	290:10,12	237:23 301:8
335:16,17	21:15,18 24:17	291:6 294:12	330:13 361:4
344:18,19	27:24 30:9	307:2,5,20	lot 20:10,17
347:16,24	33:23 35:9	308:12,17	23:22 38:8
348:20 349:12	37:9,15 42:10	309:3,14,24	40:14 44:18
350:23 353:15	50:16,21 61:12	310:5,10,25	52:13 55:11
353:15 355:23	63:23 66:12,21	311:3 312:24	61:2 119:2
356:24,24	76:2,11 107:2	319:18 324:20	124:5 135:12
360:9 365:13	110:25 113:11	325:5,9,13,18	151:11 156:10
366:25 373:19	114:2,23 116:2	325:25 326:8	156:11,12
374:19,24	116:7,12,23	340:7 341:9	160:24 166:16
375:2	127:14 132:9	345:6 355:12	200:7 203:17

[lot - managing]

Page 50

247:9 314:24 314:25 315:6 334:22 336:5 337:9 345:16 373:11 lots 52:16,16,17 52:17 157:15 loud 214:19 263:21 love 70:6 180:5 251:24 277:13 280:18 loved 334:10 low 54:24 luck 276:23 luis 43:11,12 98:11 lunch 185:20 210:8,20 lying 57:16,17 115:19,22 183:7,20 184:12 217:20 280:7 318:3 376:13 lyn 159:21 160:12	345:4 382:9 ma'am 52:2 made 4:4,7,17 5:5 20:23 24:10 28:17 62:23 74:3 81:5 82:5,15 82:23 84:25 92:18 99:13,22 100:15,21 101:3 111:9 120:15,25 122:2,8,24 123:16 124:5 124:16,18 130:13 141:5 141:10 143:17 148:13 156:16 161:11,15 164:2 165:11 172:2 173:15 173:25 175:19 176:5,25 177:7 177:16,21 178:16 179:13 183:19 187:12 189:23 195:4 195:13 196:20 196:22 198:18 200:17 220:6 221:25 222:4 222:11 223:19 233:3 239:6 266:17 326:15	329:22 331:14 342:16,17,20 352:7 355:4,11 357:6 363:6 365:17 maintain 369:25 major 161:2 215:3 234:24 252:3 majority 45:24 108:7,11 135:22 make 4:15 10:2 10:7 36:14 46:8 54:17 76:12 86:7,12 86:14 88:23 89:17 105:9 124:9 125:9 129:17 130:6,9 133:20 141:11 146:23 152:9 152:10 156:13 160:25 162:25 163:6 164:21 170:5 172:16 178:10 179:4 179:25 180:14 181:6 197:4 224:8 245:11 282:11 294:5 357:12 363:11 372:12	makes 19:19 36:22 109:11 159:12 207:23 243:7 259:4 263:21 329:23 336:10 339:13 making 86:9 96:24 121:18 121:20 161:18 162:24 183:6 202:6 206:13 220:20 256:9 300:25 317:23 375:25 man 94:25 116:5 208:20 319:10 330:8 managed 213:19 214:14 214:24 management 80:21 174:15 360:15 manager 25:6 253:4 323:23 managing 1:4,4 25:6,23 41:14 41:17 77:16,24 89:13 119:20 135:24 137:13 199:13 200:10 204:18 209:15 213:9 241:9
m			
m 8:22 12:8 38:11 43:22 229:16 250:19 251:5 273:13 279:11,12	196:22 198:18 200:17 220:6 221:25 222:4 222:11 223:19 233:3 239:6 266:17 326:15	178:10 179:4 179:25 180:14 181:6 197:4 224:8 245:11 282:11 294:5 357:12 363:11 372:12	41:17 77:16,24 89:13 119:20 135:24 137:13 199:13 200:10 204:18 209:15 213:9 241:9

[managing - melrose]

Page 51

242:15 251:17	22:2 65:16	marketplace	meaning 72:3
252:4 253:10	168:3,6,9	97:8	106:2 146:21
347:11 352:10	184:18,21	marking	223:23 308:22
354:17	185:22 191:25	350:21	means 136:12
mandated	192:9 211:8,14	marriage	194:16 241:8
94:17	225:4,20	385:17	306:3 312:10
maneuver	228:21,24	materials	328:5 334:7
108:24	229:6 233:10	371:12	378:10
manhattan	233:17 238:19	math 105:13	measures
139:5	238:21,23	173:19	233:14,25
manner 357:7	243:10,14	matter 6:15	381:24
manor 144:16	250:20 253:16	138:15 157:12	mechanics
291:22	253:19 256:13	199:21 209:20	167:11
march 61:20	256:16 262:16	252:19 268:13	meddled
83:25 84:10	262:19 267:2	294:4 324:14	209:11
91:20 99:12,17	267:10,13	346:5,8 385:19	media 6:12
99:20 100:4,6	272:19,22,25	matters 345:10	104:17,22
100:11,14,20	278:7,10	345:11,14	210:24 211:5
100:23,24	283:10,13	maximum	285:16,21
207:5 262:4,18	286:18,22	89:11 94:8	311:8,13
267:9,16	287:21 288:3	167:25	medical 11:2
271:10,11,12	300:23 301:4	maya 45:6	119:24 127:23
271:15,18,21	311:16,19	mean 10:16	377:9
272:2 289:15	315:12,14	28:17 48:12	medication
289:22 315:13	319:22,24	67:3 81:25	376:4,17
316:8 317:18	332:12,17	83:17 89:11	377:17
319:23 322:19	334:24 335:3	165:6,20 172:6	medications
382:13,14	348:3,6,19,23	188:19 197:12	376:25 377:3,5
383:3,5	351:2 355:7,22	232:22 306:8	377:8,13,19,23
mark 154:15	356:2 384:18	307:9 310:10	meeting 241:25
250:13 285:16	market 109:5	312:8 314:19	242:4 279:22
374:22	119:7 327:11	322:21 325:10	meir 12:6,8
marked 18:3,5	327:14	325:13 332:2	melrose 145:10
18:8,10 21:22		337:22	145:11

[member - misconstruing]

Page 52

member 1:4,4 1:12,12 25:23 53:9 55:9 58:24 70:14 77:16,24 89:13 119:20 135:24 170:8 182:20 199:13 200:10 204:18 205:11 207:14 209:15 213:9,9 242:15 252:4,18 253:3 253:4,10 279:8 292:2 293:6 309:23 324:10 338:24 347:11 352:10 354:17	mentioned 48:21,24 51:13 92:25 215:21 305:19 341:25	metropolitan 126:9,15 128:9 139:9	mine 51:22 59:9,12 144:16 199:20,21
	merchandise 277:22	michael 3:23 241:25 242:3 264:13 319:13	 mingle 53:2 mingled 93:15
	mere 376:2	319:13 348:16 372:5	minimum 48:17,17
	merged 344:23	 michelle 72:7 210:4	minus 12:16
	344:23,24	 michelle's 72:11	22:19 105:20 345:8
	merit 294:15	 microphones 6:5	minute 116:25
	338:18	middle 225:23 290:13 297:22	184:24 193:6 211:20 245:24
	merits 284:24	297:24	257:16,18
	284:25	miles 95:7	267:3 285:14
	mess 65:12	mill 105:4	340:2 366:25
	75:25 87:20	miller 62:18 72:7 133:24	minutes 15:12 15:15 76:17
	121:24 147:5	210:4 323:9	116:8,13
	373:24	million 53:10 54:12 113:4	277:18 285:12 340:9 355:20
members 36:6 36:19 72:19 79:22 80:11 241:9 251:17 253:9	message 338:6 338:13	119:7 240:13 240:19	362:23 364:21 367:5 370:7
	messages 164:8	millions 222:8 222:9	mirror 246:4
	335:3 383:8	mind 29:9	miscategoriz... 334:20
	messaging 312:11	37:19 146:20	miscellaneous 44:6
	 messed 124:5	159:13 208:19	misconstruing 327:8
	127:8	218:10 339:16	
memo 209:3 373:17	messing 61:5 65:9,10	347:14,24,25	
	memory 12:10 106:8		
	mental 376:19 378:9		
	mention 35:6 305:19		
	192:5,13 381:15		

[missed - morgan]

Page 53

missed	266:22	62:16 63:11,14	207:25 220:25	187:12 190:12
missing	125:9	63:17,19,19	240:18 242:6	275:3 381:13
	292:12	77:2 83:23	323:12,15	
mission	295:25	86:12 87:3	324:4 330:13	month 45:15
mistake	233:3	88:9,14 89:2	343:7,8,9,17,18	81:23 83:8
mixing	194:24	90:8,12 91:4,7	moneys 29:4	84:13 92:25
mm	10:14,23	98:6,18 108:4	93:9,10,22	
	25:5,6 155:12	108:11,23,24	95:15,16 97:6	
	169:18 179:8	109:12,15,18	101:5,11 106:2	
	179:24 231:20	124:5,9,17	107:23 108:6	
	267:17,21	125:9 133:24	108:13 109:16	
	288:8 312:2	133:25 134:17	118:20 134:9	
	356:4	135:12 136:10	150:18 155:14	
mobile	6:8	136:11,13,18	156:14 329:22	
modified		202:4 222:8	345:7,8	
	136:20 137:3	montauk 1:13	months 24:13	
	141:11 143:16	1:21 50:25	62:13 76:24	
molik	43:21	65:21 70:12,25	77:9 84:7	
moment	16:8	74:18,20 75:2	88:10 98:13	
	18:15 74:25	76:5,10,11	99:18 108:3,4	
	81:18 82:2	78:7,11,12,14	108:8 112:16	
	88:4 140:6	78:15 82:23	134:12,12	
	184:5 211:16	83:12,20,22	149:10 164:5	
	225:6 265:10	84:8,25 86:13	190:24 202:24	
	296:8 301:23	86:17,22 87:6	281:9,10,10	
	355:23	87:10,13 90:20	297:5,5 328:23	
momentarily		91:5 92:18	328:23,23	
	156:13 158:15	93:17 96:5,24	338:25 354:10	
	159:12 160:24	99:13 102:20	358:4	
moments	141:4	164:2,21	morgan 64:23	
money	28:7	181:19,22	65:9 69:12	
	35:25 38:5	182:10,10	74:2,4,8,17,21	
	39:4,5,15,17	195:23 196:4	74:23 75:3,7	
	53:11,18 54:8	197:4 198:10	76:6,8 78:11	
	55:5,6,13,15	198:20 206:15	78:16,19 80:2	

[morgan - name]

Page 54

120:12 121:24	191:10 212:25	87:9 91:19	255:8 258:9
123:10,19,20	220:9,11	99:2 101:3	267:6 277:12
123:21 150:4	225:10,11,13	102:11 130:18	359:5 374:5
153:3 168:23	225:14,22	131:9,11,12	moved 54:4
198:6 320:18	226:6,10,15,16	141:6 146:22	281:11 326:16
340:22 371:17	227:10,22	148:19 149:10	moving 358:3
372:14,16	230:11 232:23	150:23,25	367:22
373:20,22	234:23 243:13	151:4,6,9,24	multiple 24:10
384:13	243:24,25	153:11,13,13	67:11 89:15
morning 6:2	244:18 254:13	154:13,20	108:21 130:20
8:2 9:4 19:23	272:24 273:10	155:6,19	163:15 204:23
159:5	301:3,11	158:12 159:15	222:6 223:6
mortgage 84:9	304:13,16	159:20,21	265:6 303:19
105:19 119:25	305:12,16,17	162:15 169:24	305:10 329:18
120:5 121:2,18	363:10,13	170:6 171:23	332:4 371:4
121:19,20	382:7,16,24	172:3 173:13	multiples
122:9,10,25	motions 261:21	173:16 175:11	124:17,19,21
123:17 129:3,7	304:6,7	175:15 176:20	mute 6:8
129:8,20	motor 92:16	177:3 178:7,11	myrtle 12:11
130:10 177:5,9	motors 1:13,21	178:24 179:5	n
177:17,18	31:7,16 32:5	179:20 180:2	n 3:2 8:22
182:15 188:6	32:24 35:11,15	181:9 259:20	38:11 70:16
188:11,13	35:16 36:18	260:15 269:5	107:19,19
189:10	40:24 41:3,6	275:6,7 276:7	345:4 380:2
mortgages	42:15 46:19	323:13 324:18	383:19
120:9 129:11	47:7,9 51:9,14	325:3,6,10,11	nagi 341:23
129:12	51:15 60:22	325:22 326:11	name 7:11 8:3
mother 54:15	65:22,25 67:10	326:13,14,15	9:5 31:21,24
285:4 335:25	67:16,22 69:15	327:5,10 329:7	32:11,13,15,17
337:5,6,11,16	70:12,25 74:23	329:16 332:6	32:19,20,22
337:19,23	76:7 78:12,22	359:25 360:3	33:14,18,22
motion 74:4	79:17 81:19,20	move 29:12	34:13,18,21,25
90:22,23,23,23	83:6,12,19	58:10 144:14	34:25 35:2
141:2,21 142:6	86:18,19 87:5	166:5 243:6	

[name - nicolardi's]

Page 55

41:25 42:2,3,5 43:6,11,13,15 43:21 44:5,13 44:15,15,21 45:6,7 67:10 68:19 79:16 148:24 153:12 159:17 163:22 190:20 198:6 201:18 208:12 224:12 282:22 288:15 320:11 320:15 323:21 324:24 325:3,8 327:4 330:22 345:12 350:8 359:24 360:7,8 360:10,22 386:2,3 named 44:4,7 44:12 45:2 79:20 335:8 names 40:3 41:8,8,10,13,21 41:24 42:8,17 42:19,20 43:14 43:18 44:3,8 44:16,19 159:19 193:23 340:17 345:14 narcotic 377:22 narrative 294:6 narrow 146:14 368:18	nature 40:11 377:4 near 158:7 185:20 290:21 nearly 84:3 nebbish 285:6 necessarily 308:22 necessary 77:15,22 170:18 need 11:11 16:14 26:22 27:25 28:10 32:13 33:17 46:22 47:3 54:8,10 55:8 64:25 68:10,11 77:25 116:8,12 130:4 142:13 142:14 184:24 198:10 209:21 209:23 263:20 264:16 305:20 311:3 336:22 366:17 367:21 needed 19:5 53:11,19 needs 55:12 63:25 151:24 340:5 negative 89:17 negotiate 238:10	negotiated 358:12,13 negotiating 245:17 negotiations 15:4 63:13 neighbor's 353:18 neither 230:16 231:13 net 81:12,24 87:2 93:6,24 105:18 147:11 147:14 150:9 180:17 never 27:9,18 27:19 28:4 46:24 49:11 55:14 58:21,23 60:11 68:23 78:23 88:12 89:20 90:24 95:2 158:20,21 160:8 161:18 164:17,20 165:8 166:7 173:3,19 191:14 235:23 261:5,6,8 264:2 269:21 276:18 277:3,5 277:25 280:9 280:24 282:24 304:9 306:13	343:7 352:3 358:14 371:20 new 1:2,2 2:19 2:19,21 3:5,5 3:10,14,14,18 3:18 7:6,7,10 7:11,11 8:24 19:13,13 45:23 85:23 94:16 97:12,21 118:17,19 126:16 128:10 132:4 139:10 147:9 190:19 237:13 241:17 286:11 291:22 301:25 312:14 334:12 338:8 349:22 358:6 385:4,9 386:1 newly 265:25 321:13 news 354:12 newyorkcour... 283:23 nice 68:19 nicolardi 324:3 332:17,22 333:2 335:6 383:7 nicolardi's 333:20
---	---	--	---

[nicole - oak]

Page 56

nicole	2:20 7:14 385:8,24	north	331:23 331:23	numbers	48:15 54:24 83:4,5	
night	57:23 134:22	nostrand	3:9		95:13 98:2	
nights	94:21 115:21	notary	2:20 5:11 8:24 380:22 385:8		101:6,25 102:2 107:18,21 169:5,7,13	
nine	65:24 164:5 180:18 281:10 297:5 328:23		386:25	nudnik	193:10 237:19	
nj	2:2 3:13 6:25 8:7 237:13	note	6:5 209:10 300:25 374:10	number	327:22 353:15 360:24	
nodding	11:15		noted	7:8 17:13,15 19:17	nunc	316:22
nominal	1:23 2:10 7:5		4:7 153:8 153:8		nuts	333:18
non	193:14 255:9 288:2,10 288:20 382:21	notes	192:4,12 270:8 298:9		ny	1:13,20
nonconstituti...	235:12		374:14,23		nyc	348:4 351:10 383:9
nonlawyer	279:23		375:4,5,14,22		nyscef	23:13 226:25 232:9 284:6 286:10
nonmanaging	253:3		nothing's	105:24 106:4		o
nonresponsive	134:4 189:22		86:4 259:14	107:8 108:2		o
nonsense	58:11 374:5,6		nothings	109:5,25 113:5		8:22 38:11,11 43:22 345:4 380:2
normal	91:24 136:6 176:4 184:13 210:22 217:17 242:20 333:25		259:16 274:19 274:21	130:25 149:7 166:2 171:19		o'clock
			notice	175:6 180:19		164:6
			120:4 121:10	210:24 211:5		oak
			129:22,23,25	226:25 246:21		25:24
			134:4 189:22	246:21 258:14		53:10 61:5
			366:19 374:9	259:4 262:24		151:20 234:14
			381:9	285:17,21		234:15 236:3
			notices	290:9,11 311:8		237:11 241:19
			121:15 136:13	311:14 323:17		244:16 248:13
			noticing	323:18 344:19		252:4 259:14
			84:6	360:12,16		260:12,20,24
			85:19,20	361:17 371:15		264:21 265:11
			106:10 128:21	371:16 379:4		274:22,23,24
			219:13,15	381:7		275:3,6 295:14

[oak - okay]

Page 57

296:10,18	obtain	378:19	occurs	298:15	offit	341:22
297:10 299:13	obtained	131:19,21	october	84:6,19		345:2
347:12 364:12		132:13,16,24		106:9 128:21	offset	124:21
367:25 368:3		212:21,24		128:22 129:14	oftentimes	54:5
369:5,11,12,19		227:18		196:15,15,16		101:17 102:2
370:2,16,20,23	obtaining			218:17 342:18		328:5
371:4				342:20	oh	214:2 236:3
oak's	206:15		offer	369:4,18		245:25 287:17
369:5 370:4	obvious	24:13	offered	67:11		291:8
oaks	132:8			69:6 154:6	okay	10:12,13
367:25	obviously			332:4		10:17,22 11:10
oath	108:13		offering	25:2		11:13,15,20,21
object	occasion		offers	97:10,23		12:18,25 15:22
66:13 325:15	302:24			98:3		18:18 19:20
objected	occasionally		office	3:8 19:12		20:6 21:21
objection	46:21 47:16			30:22 35:22		22:4,7,20
4:17 20:11	60:6 98:20			37:24 40:2		33:10 38:20,20
21:15 29:19	occupied	82:19		42:21 45:2		43:8,16 52:5
33:23 114:23	107:8 125:20			59:6 112:21		52:12 55:11,14
140:22 141:17	126:2 127:3,25			167:2,4,19		56:11,23 66:7
219:24 220:8	128:13,23			216:21 217:25		74:15 76:11
243:4 325:17	occupy	98:6		241:23 318:22		79:8 82:20
367:7 376:6,12	occupying			319:7,8 333:22		85:5 88:19
objections	126:20,24			352:13		91:9 92:8 93:8
4:3,3,7,9,10	128:3,9,18		officer	4:7		96:19 99:20
7:19 312:25	occur	39:25		330:5,6		100:17 102:4
obligated	129:19 170:10		officers	204:17		103:16 104:14
37:5	occurred	61:15		205:8		107:10,13
obligation	144:25 145:9		offices	2:17		117:21 119:16
95:12 154:12	210:2 295:20		official	164:18		125:20 126:5
266:5	296:4 297:21			193:4,13 205:2		126:19 128:14
obligations	298:25			288:19		135:21 138:5
82:11 83:24	occurring		officially			139:7,14 143:8
98:5 240:12	298:16			204:11 299:14		152:24 153:9

[okay - originally]

Page 58

155:13,18	olshan	3:17 8:8	operator	86:24	247:19,21,24
164:22 179:11		200:6,12	opinion	15:13	249:21 250:18
183:13 184:6	once	12:3 17:16		51:20 221:8	251:4,11,14
187:2,19		63:23 280:24		278:23 310:18	252:16,20
191:23 192:24		282:25 366:18		310:19	253:6,18
193:25 194:24	one's	268:9	opportunity		254:12,12
194:25 196:10	ones	28:10		314:12 368:4	255:22 272:23
198:6 201:25		29:11 256:5	opposition		273:9 274:3
211:7 213:3,14		368:19,22		301:3,11	275:15,18
213:17 221:18	online	231:6		382:23	277:5,11
221:24 223:17		254:15 269:9	opted	108:25	278:18,20
226:13 228:12		269:15,22	options	241:17	321:11,22
233:8 239:20	op	86:24		242:16	322:10,11
240:24 242:8	open	16:15,17	order	4:19	339:8 349:16
242:18 249:16		22:2,4 24:8,8		28:11 55:3	349:17,20
250:8,23		29:2 262:21		67:4 114:17,18	350:3,12 355:4
254:22 258:19		267:7 321:13		137:23 175:23	365:13 381:21
263:5,5 267:7	opened	265:25		187:24 199:9	381:23,24
274:22 285:7	operate	107:9		211:12 212:16	382:2,6,8,10,15
286:7 289:13		159:10 277:8		212:20,23	ordered 15:17
289:17,18,24	operated			213:4 216:22	225:14,24
291:9 300:13		153:20,22		216:24 217:3,7	230:10 244:17
301:6 302:20		160:5		225:10,14	246:2 254:11
315:18 325:25	operating			226:4,15,15,25	262:5 265:23
336:5 340:3,20		136:15 153:16		227:10,14,18	274:7,10,14
341:12 350:21		153:18 211:13		227:21,24	278:21 321:11
367:11,13,22		212:16 213:21		228:4,23	ordering 38:3
375:10 376:22		215:2,5 216:14		229:12,14	246:10 379:8
378:11		232:3,5,9		230:8 232:8,13	orders 108:21
old 48:16		235:21 249:7		232:17,20	232:13 276:24
134:12,13		249:15 252:24		233:13,15,25	350:2,18
202:24 335:9		253:2 255:4,16		234:2,18 236:8	original 338:10
335:23 337:2		274:18 292:5,8		237:17 243:13	originally
337:18		358:23 381:22		245:14 246:8	159:25

[ostrager - papered]

Page 59

ostrager 12:17	own 29:9 35:25	owners 353:10	351:9 367:22
oust 361:8	36:2,4 40:14	ownership 59:5	381:6 383:21
ousted 344:4	49:7 60:10	72:14 73:2	384:4,19 386:5
outbound	63:7 71:17	102:17 290:5	pages 289:25
148:6 342:13	72:17 73:13	290:23 291:11	290:4,17
outcome 7:18	88:15,25 89:19	ownerships	paid 28:9,14
385:18	106:19 109:20	144:15	33:3 36:12
outs 77:2	118:15 119:12	owns 70:8,11	47:9,11,14,17
146:20 180:10	121:6 124:22	71:9,11 72:2	48:16,19 62:12
outside 33:4	124:25 140:7	126:6 153:14	87:24,24 89:11
75:3 76:6,8	140:17,19	291:12 292:9	98:8,10,13,21
79:4 142:6,17	141:16 157:20	324:24	119:24 120:5
219:25 220:9	167:13,13	p	120:17 137:6
220:11 243:5	278:3 295:16	p 3:2,2 8:22	147:24 148:11
362:7	305:8 322:22	38:11	151:10 170:7
outstanding	323:12 324:17	p.m. 280:2	188:21 194:6
23:9 30:17	324:24 325:3	281:7 282:3	194:10 200:19
50:8 172:19	327:4 333:7	318:2 379:12	201:14 248:14
384:9	336:2 337:5,9	page 22:21	250:6,7 265:11
outweigh 303:9	337:11 342:24	64:23 66:5,6	284:20 295:16
303:22	346:17 352:20	169:10,12	336:16 337:2
outweighed	354:25 357:3	171:19 175:6	342:7,9,23
303:3 306:12	363:19 373:18	179:17,18	343:13 346:12
overall 26:8	owned 70:21	181:12 184:24	358:14
overhead 55:7	71:5 86:20	187:22 193:3,4	painful 338:4
oversee 55:22	156:2 157:16	193:7,9,18	painter 43:11
62:7	160:10 291:23	194:21 204:14	pannepacker
oversight	325:2 345:21	204:15,21,24	23:21 27:13
221:11	361:21 362:5	205:2,4 207:7	124:15
owe 284:11	owner 86:24	213:4 225:24	paolo 44:13,25
owed 28:16	129:12 163:18	230:7 258:11	paper 67:17
63:19 151:18	165:22 242:16	290:11 301:16	144:23
194:17,18	361:2	301:22 302:2	papered 156:6
324:12 330:15			

[papers - payroll]

Page 60

papers	100:5 198:8 199:23	parties	5:5,17 5:21 6:11 14:2	patience	329:25	payment	29:7 46:14 88:6
paperworks	24:19		14:7,14 17:17 17:20 19:6,10	pay	28:9 48:10 55:6 83:19,20		89:12 121:2,19 121:21 122:9
paragraph	23:2 65:18 204:16 213:5 213:18 215:21 226:3 275:15 302:21 306:5		19:16 20:18 21:10,13 63:19 238:6 251:17 284:2 366:19 379:3 385:16		87:5,6,10,12 88:23 89:3,4,9 91:7,8 93:3,25 94:19 95:3 96:20,23 97:17		122:23 123:16 129:20 130:9 130:13 146:23 177:9,16,21 187:25 188:2
park	348:18	partner	70:20		97:18 98:21		189:22 195:8
part	12:11 45:5 49:10 65:6 72:5 78:11 86:20 101:16 165:24,25 206:2 225:24 225:25 226:20 226:24 234:15 246:19 249:8 254:12 275:10 276:7 279:15 283:22 303:11 348:11		70:21 136:23 209:7 241:17 366:3		100:13 132:22 145:22 147:21 149:4 151:23		195:18 197:9 200:15,17 201:7,13 350:7
partes	242:17	partners			152:4 177:11	payments	46:9 96:25 129:17
partially	114:4		133:21 358:11 359:4		189:25 195:23		130:6 143:22
participated	37:11 153:24 153:25 266:16	parts	24:24 38:3 62:7		196:2 208:24 240:22 241:2 328:20,20		144:10 189:21 194:21 195:2,3
particular	13:12 140:13 363:13 376:19	party	4:24 7:16 174:25 310:24 360:6		343:19,21 372:7		196:11,19,21 197:4
particularly	13:6	pass	298:13	payables	240:19	payroll	41:10 41:11 42:2,18
		passed	160:12 332:6	paying	83:24 84:8 87:18,21		43:13,24 44:2 44:11 45:12,14
		password			90:21 91:5,17		45:16 46:16,25
		past	28:15 49:6 49:21 62:24		91:19 93:6 94:11,12 95:19		47:15 87:3 141:11 149:9
			92:19 166:12		129:4,5 131:17 132:20,21		150:22 151:18 151:21,24
			166:14 196:24 329:6		133:3,6 206:10 240:20 331:7		152:10,11 166:3 195:23
		patently	366:12		331:10,14		196:2,5 259:20
		path	235:16 358:2		346:6,9		259:23 324:13

[pays - phone]

Page 61

pays	39:4 83:17	35:7 36:9,16	291:23 292:9	152:6 156:3
pc	196:12,20	38:8 39:14	309:22	198:11 199:2,3
	197:18	40:3,18 41:9	perfect	199:7 266:18
pdf	193:10	42:5,15,22	performing	323:12,19
	278:18	43:8 44:3		324:17,19,21
pdfs	69:8,10	45:17 46:16	period	329:15 341:24
peak	107:14	51:13,15 52:25		342:5,11 343:9
peep	70:2 88:12	55:18 62:5,6	perjury	343:23 373:21
peldman	62:17	64:5 72:9 92:6		personally
	72:3 85:24	94:10 95:24	207:11 288:20	21:9
	133:16,25	96:11 98:4	297:3 300:2	54:3 98:24
	134:16 135:9	133:20 139:13	permission	114:10,10,12
	135:13,18	139:18 152:10	230:19 231:15	121:25 122:19
	137:16 358:5	162:20 164:19	231:16 248:9	144:2,15
	358:16	165:24 166:11	277:8 346:24	199:17 200:18
peldman's		166:18 167:3,7	permit	238:12 313:24
	135:9	167:18,21,23	349:9	341:13,17,18
penalties	188:7	198:7 210:6	permitted	341:19,20,21
penalty	206:25	318:9 319:2	4:14	341:24 343:4,4
	207:10 288:19	329:25 330:8	person	345:3 352:20
	297:2	331:25 332:8	4:9,21	354:15 357:18
pendency		334:10 353:21	persons	4:15
	233:15 234:2	360:24 361:12	perspective	
	276:4 381:25	371:10,10,14	93:23 303:23	
pending	176:7	people's	perusing	22:7
	177:20 178:14	368:23	66:4 168:18	
	179:12 181:18	percent	243:24 273:15	
	182:8 190:11	39:17	peter	324:2
	230:10 236:24	52:11 59:5		332:17,22
	237:3,10	70:11,13,21,24	335:7 337:22	333:2 335:5
	254:11,13	72:3 107:20	350:6,7	
	269:11	161:13 204:18	person's	383:6
people	29:5	205:11,21	43:5	petition
	30:24 32:8	210:17 218:22	323:21	287:25
		219:11 242:15	personal	288:9 382:20
		264:10 291:12	49:12	phone
			55:5,6 99:3	29:23
			115:9,11 118:4	36:9 47:18
			122:19,21	

[phone - posed]

Page 62

121:24 130:4 130:21 167:5 200:4 323:17 323:18 360:10 360:16,24 361:17 phones 6:8 phonetic 43:16 45:3 207:20 345:12 photocopies 375:25 pick 6:6 29:10 338:10 picking 304:18 pictures 334:9 piece 144:23 piecemeal 256:19 pieces 24:24 pig 183:3 pigs 185:11 place 6:10 48:13,15 97:8 98:25 132:6,19 371:20,21 372:2 380:11 places 345:17 plainly 4:20 plaintiff 2:3 6:22 7:2 8:16 plaintiff's 226:14,16	plaintiffs 1:6 1:15 6:17 plan 334:2 planned 14:25 15:5 plates 328:5 play 250:3 playing 59:13 90:6 182:11,12 plaza 3:13 please 6:5,7 7:20 8:14,19 10:21 11:11 17:8 33:25 41:5 55:23 66:4,5 88:18 104:23 116:22 134:5 136:5 140:4 184:16 211:20 223:14 224:24 228:14 228:19 233:5 242:19 254:6 258:23 269:7 269:12,13 278:17 281:13 282:25 300:25 348:19 355:8 355:13 365:24 370:14 377:11 pleasure 202:4 pledged 291:15 339:6	plug 235:17 236:10,12 237:19,23 238:3,14 261:17,21 plumber 350:11 354:9 plus 12:16 22:19 105:20 262:8 345:8 pocket 88:23 89:3 148:15 152:20 199:14 point 12:11 19:21 26:14 46:4 54:15,25 75:10,21 76:2 86:15 94:8 96:11 108:19 113:12 125:9 161:21 165:14 176:16 209:25 232:11,14 234:17 235:22 244:9,12 246:6 281:8 289:24 290:3 296:23 296:23 302:20 307:10 314:13 320:20 332:8 336:18,19 364:17,24 365:6 368:24	pointed 49:11 police 19:12 94:17 95:5,8 110:23,23 112:23 330:3,5 330:6 331:3,5 331:9 policy 132:4,19 133:3 134:8 137:13,20 pond 60:9 105:4 109:23 113:3,7 117:18 125:13 126:2 131:15 137:10 137:19 138:23 144:16 291:22 poof 52:4 porsche 148:23 327:2 portion 95:13 95:16 portions 36:7 67:2 pose 114:3 117:13,14 138:18 258:23 281:17 posed 116:9 117:6 174:7 224:24 228:18 257:25 292:20 292:21 319:19
--	--	---	---

[position - procedure]

Page 63

position	205:15 234:22 338:21 364:2,7 369:25 370:18	preclusions 157:22	384:15
possibilities	298:11	prejudice 4:20	presides 19:15
possibility	48:8	preliminary 244:19 246:16	presumably 104:4
possible	25:9 31:12 75:8 102:8 117:25 118:3,5 122:15 134:11 196:3 196:24 298:10 298:10 300:3 312:16 330:12 333:24 343:15	premise 331:6 331:10	pretty 30:4 45:12 49:18
possibly	26:20 39:16 159:9 163:12 191:12 266:2	premises 331:10	99:6 143:25 310:21 315:9 319:10,11 370:25
post	83:14	premium 135:11 152:14	prevents 353:17
pot	264:12	premiums 133:18	previous 269:17
potential	97:9 109:4	preparation 13:9 14:12,18	previously 113:14,17,23
potentially	262:6 300:2	15:5,7 348:11	114:6 143:12 227:5 291:23
practical	151:16	prepare 12:25 27:2 30:15	price 119:7
practice	4:5	prepared 26:10	prime 106:11
preapproved	88:11	preparing 15:16 164:9	principals 369:6
preclude	228:11	prescribed 377:24	principles 140:16 369:20
		present 3:21	prior 27:11
		7:22 62:24	33:7 83:14
		141:7,22 143:5	86:2 161:4
		presently 41:3	163:18 215:6
		42:16 70:8	287:16 289:25
		71:9,10,11	290:4 302:24
		132:17	306:7 313:3
		preserve 4:18 325:19 375:22	368:8
			priority 28:12 29:11 93:5
			problems 56:7 56:7 61:2,6 92:14 161:2 163:19,20 333:3 353:13
			procedure 290:25 291:2

[procedures - provide]

Page 64

procedures	production	316:2 352:23	138:22 139:4,9
211:14 212:17	30:3,8 164:5	372:11	143:14 153:10
232:9 381:22	productions	properly 62:8	155:2,2,11,25
proceed 4:8	313:2	93:16 203:21	157:8,10 160:5
8:21 17:8 27:6	profit 81:12,20	208:20	160:16 162:22
104:23 140:4	105:18,18	properties 25:5	176:8 177:6
143:9 370:14	145:17,18	25:5 26:3 60:7	178:15 179:13
proceeding	326:15	60:20 61:23	188:7,11,14,20
7:20 176:7	profits 188:9	71:4 88:25	190:12 206:14
179:12 276:4	189:16,17,18	89:18,20,21,25	206:15 253:11
344:16	326:11	124:8,11,13,22	345:21 350:16
process 37:12	progress	124:24 140:17	351:17 353:13
39:15 52:22	359:19	140:18,18,21	354:5 356:14
55:22 60:6	prohibit 363:21	141:15 145:4	proposal 27:4
65:6 152:18	366:14 368:11	145:13,14,17	38:25 330:11
156:4 161:15	prohibiting	145:18 160:6	334:16
219:2,16 220:3	365:15	220:17 315:25	proposals
255:14 278:4	project 12:11	318:6 345:15	45:23 46:2,5
358:3	85:22 328:22	361:21 362:5	proposed 252:4
processed 24:3	329:2,3 349:22	364:12	prostitutes
25:8	352:20 359:5	property 31:8	264:13
processes 64:2	projects 46:4	93:11,25 94:14	prove 123:11
processing 31:2	328:22	96:5 97:15	372:24
produce 66:24	promise 183:24	98:17 105:3,9	provide 32:12
91:14 108:4	promised 350:7	108:22 109:23	64:24 75:23
312:18 384:15	promotes	110:4 112:4,11	254:24 255:11
produced 67:8	124:14	113:2,6,9	255:12 256:5
67:15 153:4	prompt 252:3	114:19 117:18	259:7 260:15
312:21 313:4	proof 79:7	126:6,8,14,20	261:10 262:8
376:3 384:13	331:11	128:4,10,18	274:14,15
producing	prop 86:25	131:4,7 132:17	275:19,24,25
66:25 81:18	proper 35:2	133:12 135:10	364:8 365:18
184:18	98:2 107:13	135:19 136:4,8	366:2 370:18
	143:24 156:6	137:9,22	

[provided - question]

Page 65

provided	4:21 5:14,17 14:2,6 14:13 16:18 23:4 48:25 62:21 64:3,14 64:18,21 66:8 67:7 68:8 231:18 254:15 262:9 275:19 326:3 366:19	236:10 237:19 238:14 261:17 261:20 262:7	pursuit	118:25	quality	334:8
	provides	215:2	pushed	163:14 323:15	question	4:20 4:24 5:6 10:11 10:16,21 11:18
	provision	188:16,17 215:18 216:4,6 216:17 296:6	punch	43:3 103:4	put	20:20 29:25 38:24 48:9
	provisions	188:23 232:20 295:21	purchase	105:2		31:6,22 34:5 36:24 37:16,18
	proxy	264:21	purchased			37:19,21 39:12
	psychological	377:4,14	purchases			40:8,15,17
	public	2:21 5:11 8:24 83:19 239:6 242:21 262:11 359:9,10 380:22 385:9 386:25	purported	158:9		52:19 56:14
	publicly	242:24	purport	230:16 230:17 287:5		58:8 59:7
	pull	236:12 238:3 265:19 355:17 365:12	purportedly			60:13 61:13
	pulled	45:12 53:18 235:17	purporting	184:7 197:22		67:13,14 69:9
			purpose	218:24 235:5 244:23 244:24 287:4		69:12,19 74:6
			purposes	300:20 302:17		85:11 88:4,17
			purportedly	305:2 310:12		88:18 89:6
			purporting	318:21,25		90:6,7,9,14,15
			purpose	319:6 320:18		90:17,18
			purposes	328:6 329:13		103:10,13,13
			purposes	336:21 353:12		106:24,25
			purposes	355:16 359:14		107:4 109:7,9
			purposes	360:18 373:18		109:9,10 111:2
			purposes	375:4		111:11 113:25
			purposes	375:4		114:3 115:7
			purposes	4:10 89:12	puts	116:9 117:13
			purposes	260:6 261:13	putting	117:14,15
			purposes	290:24 292:3	putting	118:2 126:13
			purposes	296:3 359:16	putting	126:13 127:23
			purposes	221:9	q	128:6 132:11
					qualified	134:19 135:2
					qualified	135:15 137:15
					qualified	138:3,18,20
					qualified	139:20 140:9
					qualified	140:13 141:13

[question - read]

Page 66

141:14 142:24	286:25 288:6	117:6 122:6	278:20
145:25 146:11	289:3 292:19	127:15 134:24	r
146:12 147:17	292:20,21,22	135:4 172:14	r 3:2 8:22 12:8
151:17 154:14	292:23,24	180:20 201:23	49:24 345:4
156:19 166:24	294:17 297:25	249:14 258:19	358:12 360:10
167:20 170:20	301:6,14	259:16 269:19	380:2 385:2
171:4,5,15,17	302:19 308:19	270:18 294:7,9	raise 362:15
174:5,6,20	314:18 316:7,9	294:14 307:15	raised 4:11
176:2 180:9,22	316:11 319:18	307:19 308:5,6	260:21
180:23,24	320:21 325:15	308:11,16	raising 242:6
183:10 184:8	325:20 326:5,6	348:14 363:2	ran 48:13
188:24 202:17	326:7,9,20,22	364:22 365:3	88:13 101:24
202:20,21	332:8 335:19	365:16 366:6	241:21 346:18
203:2,4,5,7,12	341:4,20	366:11,20,22	347:3
210:16,17	345:18 346:7	368:12 369:10	range 105:14
211:22 212:2	355:13 356:4,7	370:4,17 375:9	155:22
215:10 217:16	356:11 360:21	378:20,21	rates 188:3
221:4,6 222:20	364:5,10,15	384:18	234:25
222:24 223:2,4	365:20,23	quick 166:13	rather 15:4
224:23 227:12	367:20 374:2	quickbook	reach 121:23
227:15,17	376:24 377:11	260:10,12	271:5
228:18 229:8	384:19	quickbooks	reached 23:20
232:15,16	questioning	31:12 39:8,11	268:24 269:2,3
236:24 237:2,3	4:12,16 143:6	40:5,10,13	272:10 345:13
247:20,22,23	185:19 308:4	60:24 61:3	359:19,20
248:2 251:3,7	362:16	260:14,22,25	reaching
251:10 253:21	questionings	373:14,15	191:15
257:11,25	180:10	quit 166:12	read 13:3 37:21
258:3,23	questions 4:17	167:21	52:3 69:17
263:19 269:11	9:7 57:12	quite 41:18	71:13 116:22
273:7,11,25	64:11,13 76:4	82:9 152:9	157:18 182:19
274:5,8,11,12	91:3 99:25	298:22	216:5 218:14
279:5 281:17	110:15,18	quote 23:7,12	218:14 225:23
283:15 286:6	115:15,18	230:10 265:24	

[read - reconvene]

Page 67

231:11 245:22	reality	102:3	271:24,25	recess	17:5
245:24 246:11	realize	306:2	272:2 312:16		104:19 116:19
246:22 247:17		353:6	312:17,20		139:25 211:2
256:3 257:14	realized	336:2	314:21,24		285:18 370:11
263:20 270:11	really	55:19	315:2,8,10	recitals	187:23
270:13,15		80:16 106:12	322:2,18	recognize	
275:9,12		166:24 167:15	receive	18:23 22:5,9	
291:16 293:24		171:14 237:20		65:7 168:14,20	
294:25 296:2,5		241:16 335:21	received	186:8 192:17	
301:13 304:12	realtime	78:4	88:14,20		211:18,23
304:18 305:22	rearview	246:4	121:10 261:11		229:9,11
305:23 335:24	reason	5:7 11:2	267:25 329:6		233:22 239:3
338:23 339:5,5		18:20 108:2	351:16,19		243:17 263:7
344:12 353:7		124:11 188:25	356:13,16,19		273:8 289:4,8
357:13		195:8 201:13	receiver	289:10 301:7	
reading		204:5 207:22	191:10		315:21,23,24
218:9 225:12		270:12 300:15	233:16 234:5		320:5
247:15 252:7,7		302:5,7,9	253:25 304:6,7	recognized	
310:6 367:13		323:6 386:5	304:13,16	158:15	
ready	reasonable		305:2,15,17	recollection	
218:11 224:10		91:17 206:23	306:4 382:4	33:24 195:18	
real	reasons	24:13	receivers	374:13 375:11	
1:5,14,21		53:7 74:22	303:24	reconcile	26:2
2:6,9 3:17 7:4		197:8 205:25	receives	98:17 323:25	
8:9 12:12		207:19 265:5	recent	324:9	
49:16 64:13	recall	12:3,19	12:23	reconciled	
90:6,7,9 105:3		12:24 14:16	165:21 305:5	98:25	
105:3 112:25		15:20 33:14,18	333:23	reconciliation	
124:12 157:18		70:17 74:2	recently	63:3	
171:14 197:10		77:3,6,18 78:2	45:5	reconciliations	
197:19 251:18		102:4 106:7	70:3 97:3	65:13	
276:9 304:24		107:16 120:14	106:14 134:7	reconvene	
318:14 337:21		120:24 121:18	167:13 302:17	308:13	
372:25		121:20 271:20	313:17		
			reception		
			167:5		
			receptionist		
			36:11		

[record - relevant]

Page 68

record	5:8 6:3 6:11 7:24 16:24 17:2,3,7 20:20 21:4 33:2 35:23 36:2,12,14 40:12 54:23 92:13,14 103:15 104:16 116:11,17,21 117:10 127:19 135:4,19 139:21,23 140:3 173:22 181:23 183:22 185:13 210:10 210:23 211:4 218:3,12,19,24 219:7,23 221:21 270:25 277:17,19 285:11,15,20 310:8 311:4,6 311:7,10,12 325:20 351:24 365:10 370:9 370:13 379:7 385:13	110:24 137:24 152:25 168:9 168:12,15 255:13 258:11 258:12 260:4 261:11 262:12 275:21 364:8 364:13 366:5 370:19,21 381:10 384:10	refers	226:14 226:14 292:14 298:22
			reflect	88:3 101:22 102:2
			refresh	33:24 195:17 374:12 375:10
			refusal	4:17,22
			refused	89:15 109:17 137:25
	recourse	306:3		163:17 177:19
	refer	42:6 212:10		210:2
	reference	212:6 334:15,16	refusing	360:20 374:25
	referenced		regard	373:7
		149:12 287:16 298:5	regarded	192:5 192:14 381:16
	referencing		regarding	373:7 137:16 157:5 345:15
		246:4		24:8 30:19 62:10 72:17
	referred	37:20 42:7 51:6		108:16 371:21
		293:11 297:21	relating	117:5
	referring	36:18 50:24 94:4	relations	12:6
		209:8 277:20	relationship	108:16 371:21
		286:17 294:19	relatively	26:7
		295:11,12,18	released	137:22 148:24
recorded	6:13 9:20 187:7	295:19 298:6 299:4 303:7	relevance	140:23 141:20 242:20 243:5
recording	6:9	310:11 314:22		378:14
records	31:11 38:12 39:23 67:9 104:21	317:12,14 356:22	relevant	26:7 123:8,8 141:9 223:2 375:5

[relied - represents]

Page 69

relied 306:6 308:24 309:7	reminded 218:16	rents 92:22 94:3,4 186:21	138:9 151:19 159:3 200:9
relief 4:9 284:5 305:6	remotely 7:22 308:18	reopen 378:18 189:2,18 190:5	226:2 240:15 242:2 331:4
relinquished 61:19	remove 328:5	repaid 170:18	340:5 349:19
rely 307:11,12 310:14	removed 237:11 280:2	repaint 327:25	reporting 372:16 386:1
remain 227:14 232:2 249:5	rendered 237:10	repayment 189:20	reports 44:2 45:16 144:13
remainder 4:25 26:2	rent 83:17,19 83:20,22 86:17	repeat 37:18,18 138:9,10	358:25 359:7 359:15 371:5,8
remaining 97:2 278:25	86:19,22,23	377:11	represent 7:14 9:5 197:19
remains 232:9	87:4,5,9,12,24	repeatedly 310:4	313:15 370:16
remedy 352:6	87:24 91:4,6	rephrase 105:23 377:2	representation 200:25 343:23
remember 12:13,21 32:21 43:14,21 104:6 105:7 107:18 107:24 109:16 175:23 236:14 245:15 246:12 257:15 258:7,7 268:3,7,9,18,19	94:12,19 95:3 96:15,20,23,25 97:10,25 98:8 98:18,19 99:14 118:11 119:10 119:11 127:5 128:24,25 159:11 161:14	replacement 330:18	343:23
270:7 271:7,11 271:13,16,19 272:13 295:23 299:24 300:4 314:9 317:18 323:22 358:6 375:7	rentable 118:9 rental 113:9 rentals 111:19 114:13,15,20 115:2,4 117:17	report 41:10,11 42:19 43:24 44:11 45:13 46:10 54:13 170:13,22,24 170:25 171:6,8 172:20,25	representations 313:17 344:20 369:15
remembered 10:20	rented 113:15 114:6 118:10 renting 125:18 126:20,23 128:3,8 162:24	reported 27:24 98:15 173:3,8 183:24 reporter 7:13 8:19 12:7 37:17,22 49:22 68:14 69:22	represented 246:23 309:5 340:11 341:15 342:24 344:16 344:25
		79:13 137:18	representing 5:22 125:12 199:17,18 200:3 309:21 313:23 343:3 345:3,7
			represents 310:4

[republic - returned]

Page 70

republic 1:9 6:19 65:11 80:2 201:21 371:17,22 372:19,20	reserving 308:10 resign 230:18 244:15 299:20 resignation 208:14 250:8 292:4 294:19 294:22 295:7 296:5 297:13 297:20 298:4,6 298:15 299:17 299:18 resigned 265:6 265:11 291:25 293:5 resigning 213:8 resolution 358:2 resolve 338:2 350:5 resolved 373:24 resolves 119:8 resolving 23:8 30:16 resource 305:3 resources 324:18 325:12 325:14,23,24 respect 5:18 121:13 235:2 270:20 280:5 329:7 362:13	367:24 respective 5:21 85:6 144:14 216:13 respects 244:20 respond 67:5 129:17 130:7 209:21,23 269:25 272:8 338:12 responded 68:18,20 135:14 257:19 257:20,21 270:3 271:4 272:8,16 321:20 333:19 responding 66:23 334:2 353:18 responds 368:13 response 24:12 66:13,15 202:10 258:8 266:9 308:20 responsibilities 216:13 responsible 55:19 60:19 136:7,9 242:14 242:17 responsive 58:12 255:9	258:19,20 rest 328:21 restated 292:7 restaurant 319:14 restoration 212:10 328:4 restore 230:23 327:23,24 restricted 4:10 restriction 270:13 restrictions 249:6,10 restructure 71:22 result 74:12 85:10 150:9 163:9 206:17 208:7 resulted 25:7 retail 332:9 retained 23:18 26:25 27:18,19 28:4 30:14 379:5 return 25:12 49:16 102:5,11 102:16,19 103:24 104:10 130:4 150:14 152:12 returned 146:24
--	---	--	--

[returns - right]

Page 71

returns	23:10 25:16 26:2,15 26:19 27:12,15 28:22 49:5,6,8 49:12,13,14 50:4,6 52:10 62:24 102:24 103:17 371:9 384:7	42:15 46:18 47:7,8 51:14 51:15 55:21 60:22 62:5 65:24 131:12 153:10,13 155:6,19 156:2 156:4 158:12 159:15 162:15	rid	339:20 ride	157:23 ridiculous	332:23 right	4:9,18,24 11:7,9 15:21 17:11,14 30:20 37:4 38:16 39:15 41:15 45:21 49:10 52:5,15,17,18 52:20 55:4,10 56:8 60:8,23 60:23,24 61:11 62:6,13 63:10 65:14 67:3 70:4 72:19 76:15 84:11 85:19 86:16,17 86:25 87:3,19 89:9 92:5 93:2 95:23 108:19 109:5,8 111:14 116:2 123:23 124:3 125:4 128:10 131:4,7 131:12,15 137:10 138:11 138:23 139:10 143:19 145:15 145:19 158:10 161:24 168:25 169:9 174:12 175:14 177:24	181:12 183:25 184:17 187:7 188:24 190:2 195:2,7 198:9 198:15 201:6 203:15 207:9 208:19 209:4 209:16 212:18 214:7 218:15 224:2 228:15 233:2 235:16 241:3,16 242:6 244:5 245:7,8 246:25 252:21 252:22 253:5 254:2 264:22 267:25 268:5 273:5,21 279:18 280:19 280:19 281:2 287:20 291:18 293:3 298:12 298:13 300:3 301:22 307:21 308:2,8,10 310:8 316:15 317:5,20,21,22 323:23 334:9 360:16 361:23 362:15 363:15 365:16 367:16 367:23 370:22 372:4,13 375:13,16,21
reveal	307:7	164:23 259:20						
revenue	81:4 81:13,14,15,21 81:23,23,25 82:4,14,18,22 83:9 84:24,25 86:6,7,10,14,18 89:21,22 92:19 93:18 96:2 99:13,21	260:15 276:7 323:13 324:17 325:3,6,10,11 325:22 326:11 326:12,14,15 327:5,10,18 329:7,16 332:6 359:25 360:2 review 9:24						
100:15,21	13:13 18:15							
101:2,14 105:8	192:19 202:14							
105:15,22	203:7 225:6							
106:4,11 107:3	231:14,16							
107:22 109:3	302:11							
109:13,22	reviewed 13:11							
110:8 111:12	13:25 14:6,12							
111:16 112:24	299:22							
118:21 119:2	reviewing 13:8							
161:14,23	reviews 330:2							
195:25	revision 295:3							
rever	31:7,16	revisit 35:3						
32:5,24 35:11	143:9							
35:15,16 36:17	richard 160:13							
40:24 41:2,6								

[right - says]

Page 72

378:6,18	role 40:7 167:4	runs 275:3,6	366:15 375:2
rights 5:17	167:16 183:2	s	says 19:23
159:5 189:14	roles 43:9	3:2 8:22,22	20:10,17 22:22
214:6 215:24	55:22 216:13	38:11 70:16,16	23:3 39:8
215:24 216:2	room 95:21,22	381:2 386:5	40:12 65:18
217:13 224:2	124:2 166:9	salary 88:8,21	112:19 133:23
235:8,20 287:5	217:25	sale 100:18,19	133:24 144:20
322:9 339:2,9	rooms 96:7,10	110:11 112:12	157:4 169:5,12
339:14,16,19	rough 379:11	112:13,18,22	169:16,19,23
339:23 347:11	round 95:12	127:9 129:11	171:21,22
ring 268:8	rover 326:25	160:11	173:12 176:18
345:12	rovers 334:22	sales 35:23	178:5,23
risked 330:10	rpr 2:20 385:8	75:24 156:7	182:16,17
risks 98:6	385:24	sam 343:13,19	186:23 187:20
rit 159:21	rude 138:16,16	343:21	187:20,24
160:12	rudis 3:22 7:12	samaritan	193:12 194:5
ritter 261:18	ruined 284:25	136:5	194:12,14,21
296:16 298:21	353:3	santoro 371:23	195:7,8 197:23
rnhamponts.c...	ruining 241:15	sat 158:21	199:12 200:3
268:16	rule 4:5,6,14,15	saving 103:8	201:2 204:16
road 105:4	4:22 290:24,25	saw 129:22,23	206:11,12,19
137:10	rules 4:2,5 5:2	206:4 255:18	207:4,8 208:15
robbed 353:20	5:7 208:2	304:25 309:12	209:5,13
353:20	209:4 284:3	310:6	212:17 213:5,6
robert 3:6,6,22	294:16 331:8	saying 27:25	213:18 214:12
7:12 8:15	363:21	68:20,22 133:5	214:21 217:6
23:12 37:4	ruling 142:13	149:15,17	225:11,13,22
153:5 154:17	142:19	162:11 187:7	225:24 226:3,8
234:13 238:17	rulings 384:18	189:7 194:15	226:15,19
262:2 306:24	run 55:17	261:8 265:16	227:8,13
360:14,17	116:15 212:11	298:8 303:8,13	229:19,23
rockefeller	336:23 373:18	303:16 316:2	230:6,8,15
3:13	runaway 334:4	321:18 333:12	231:4,13,22
			232:7 233:3

[says - section]

Page 73

234:14,21	375:15	307:24 308:13	screenshot
236:22 237:6	scared 119:4	308:21 309:10	68:17 269:24
237:14 244:17	219:21 265:17	309:19 310:2,7	282:19
244:23 247:15	schedule 262:7	310:12 311:5	screenshots
248:5,18,25	355:16	320:10 324:23	272:5
252:2,14,14,17	schedules	325:11,16,22	screw 347:22
254:10,12,23	192:6,14	339:25 362:3,8	screwed 339:15
255:3 256:9	194:25 381:17	362:12,21,24	scroll 288:17
257:5 258:14	scheduling	368:7 379:10	290:13
258:25 265:12	284:4 362:11	383:22	scum 115:18,18
265:12,18,18	363:6	schwenks	116:15 181:12
267:19 268:22	scheme 26:8	65:23 70:15	181:24 183:11
269:20 274:2,6	school 45:8	scope 26:8	sdny 237:15
274:10,13	schwartz 3:8	141:21 142:6	se 279:22,24
275:15,23	3:10 8:2,3 9:3	142:18 219:25	season 108:8
276:16,17	9:5 16:25 30:2	220:9,11 243:5	118:20
277:11 278:17	30:6 34:2	362:7 363:7	second 27:7
280:13 281:19	35:13 37:13	scott 313:10,12	44:15 55:23
288:18 289:15	58:9 59:18	313:13,14	139:22 142:7,8
289:16 290:5	76:9,14 104:14	314:6,6,7	168:18 187:22
291:10,12,21	110:21 117:7,9	344:22	191:23 199:22
293:5,24 295:6	127:10 139:21	screamed 336:2	200:2 213:4
296:4,7,8	140:24 141:3,9	screen 18:13,21	225:4 230:7
298:23 299:19	141:18 142:2	21:25 65:16	232:25 233:8
299:22 303:14	142:14,21	168:4,5 192:2	247:17 254:12
303:20 305:7,9	143:8 165:18	211:10 225:6	292:15 300:25
309:20 312:4	185:4,14,18	228:22 238:20	331:2 345:4
314:11 316:3,4	208:4,8 220:10	238:21 243:11	seconds 247:3,5
316:5 317:16	220:14,22	250:15 262:17	256:7
320:10 321:9	221:2,12	263:2 272:21	section 5:7
322:8 334:3	234:11 238:8	283:11 300:24	204:22 213:20
337:20 344:11	242:8 255:8	315:16 320:3	214:25 251:25
344:12 348:8	277:23 278:16	332:14	252:6 254:23
349:7 351:16	285:8,13 307:9		254:25 275:14

[section - segregate]

Page 74

291:9 292:7	204:15,20	264:11 267:15	336:7 347:20
296:6 358:22	205:7,13,18	267:18 268:10	347:21 349:2,7
sections 5:18	207:3,4,6	268:22 271:9	351:15,22
secure 187:25	213:5,12,17,18	272:16 273:12	352:11 354:21
security 98:2	213:25 214:21	273:14,17,19	356:21,25
see 10:7 13:19	215:8,15	273:20 274:2,6	368:10 375:24
18:12 19:24	216:17 222:13	274:9,13,20	seeing 289:17
22:6,16,22,23	223:8,10,11,12	275:14,23	351:20 375:19
23:15 25:12	223:15 226:8	277:13 278:12	seek 156:15,21
29:19 34:7	226:11,13,19	278:14,22,23	156:24 158:17
36:22 38:23	226:21,23	279:13,25	158:19 304:19
43:17 44:17,17	227:2,7,11,13	281:19,21	304:20 307:16
44:23 46:14	227:16 229:14	282:5 283:5,16	378:18
47:12 65:18	229:17,18,24	283:19,21	seeking 248:7
66:2,7 72:8	229:25 230:6	284:7 286:16	284:5 303:24
104:9 148:9	230:13,15,20	288:7,18,21	306:18 363:12
152:18 155:23	230:22 231:2,4	289:14,18	seem 153:16
169:4,7,19,20	231:8,13,19,21	290:7 291:3,5	seems 25:22
170:3 171:21	232:4,7,24	291:10,17	169:22 296:25
171:24 173:6	233:20 234:21	292:11 293:3	308:18 336:9
173:10 175:9	235:4,7,10,19	296:15 297:14	seen 13:14,19
175:12 176:11	238:25 244:17	297:15 298:21	22:13 25:21
176:22 178:8	244:21,23	300:24 301:21	65:3,4 186:2
178:22,25	245:4 248:5,10	303:4 309:19	191:14 205:25
179:18,23	248:17,24	310:2 311:25	257:12 318:21
180:6 183:2	249:11,12,17	312:3,6 313:9	318:23 320:6
186:5,9,19	249:19,19,22	314:17 315:2	320:13,16
187:2,19	251:4,6,8	315:19 316:5	321:2,4,25
188:15,17	252:17,21,22	316:10 317:25	322:7,14,17
193:12,20	252:23 253:10	320:9,11,15,17	342:19 349:12
194:7,24 195:7	254:10,18,22	320:22 321:8	349:13,14
195:15 196:10	256:24 257:7,9	322:12 324:11	352:3 371:24
197:6,8 202:3	258:5,6,14,25	332:20 334:3	segregate 52:20
203:18,20	259:4 262:14	335:11,24	

[segregated - shopmonkey]

Page 75

segregated	134:16,16	226:6,10	severe 326:13
51:17 55:7,15	135:9,17	227:11 301:4	severely 89:8
58:7 86:21	143:23,25	301:11 382:24	sexual 319:9
93:11 109:18	144:2,3,9	serious 206:13	sfc 279:15
121:5,8 149:2	147:12,23	328:18 338:16	283:22
149:18	148:6 149:21	service 33:3	shake 58:5 90:2
sell 101:17	180:6 198:10	38:13,14,15,21	120:17
125:15 156:8	201:10 209:10	45:22 87:6	shaken 331:13
334:14 338:4	213:6 222:10	106:7 188:22	share 31:17
selling 113:4	263:16,24	189:21 332:7	86:25 153:6
119:2 130:24	272:3 285:23	356:13,16,19	shared 24:17
130:25	285:25 287:2	servicing	130:23 135:12
sells 159:8	293:10,16,20	163:13	136:19
send 17:10 20:9	298:7 313:25	set 4:19 5:7	sharing 378:2
20:14 21:8,13	318:2 352:22	83:18 214:15	shebang 234:16
39:8 65:4	352:23 356:5,9	214:25 226:24	371:16
84:20 189:21	sentence	227:9 292:4	sheet 386:1
209:22 239:23	214:12,22	385:12,21	shelters 125:10
242:24 356:12	216:7,9 249:9	sets 316:17	shifted 323:23
sending 84:21	249:12 314:11	settlement 15:4	shipped 334:18
265:25 321:16	separate 52:23	63:13 66:16	shit 112:25
371:13	55:8 72:4	316:23	123:25 217:4
sends 371:4,9	93:13,14 94:10	seven 65:23	240:11 248:23
sense 36:22	95:21 96:13	124:17 162:24	252:12 355:14
148:13 161:15	150:5 160:6	163:11	shocking
162:25 207:23	257:21	several 24:12	358:11
245:11 306:7	separately 53:3	24:16 26:11	shop 93:14
329:23 339:13	september	37:23 54:16	159:14,18
355:5	84:18 109:15	97:10,23	161:4 328:2
sensitive 6:6	129:13,14	112:15 140:20	330:16 361:11
sent 18:25	244:24 356:2	167:3 193:21	shopmonkey
20:19,19,20	383:16	272:4 281:22	38:10 39:21
21:11 63:7,10	sequence	345:13	45:21
133:17 134:4	225:10,15,22		

[short - simplicity]

Page 76

short	17:5,24 104:15,19 116:19 139:25 152:22 211:2 264:18 285:18 370:11	282:9 283:10 287:20,22 311:16,17 315:11,16 318:24 319:21 320:2 332:11	side	68:21 72:6 173:18 256:4 sidelines 163:24	simco	1:17 6:23 65:23 79:20 80:5 99:5 140:6,7 141:6 141:15 142:10 143:13,20,23 144:3,16 146:9 146:17,21 147:3 148:19 148:21 149:3 149:19,23 150:8,25 151:10 152:7 168:9,12,24 170:6 172:3 173:6,16 175:16,22 176:20 177:3 178:7,12,24 179:6,21 180:3 194:2,10 195:13 196:4 199:3 201:4,12 343:10,21 361:21 362:5 381:11 similarly
shortfalls	149:9 152:21	332:13 333:9 334:8,9,23	sign	110:11,22 111:5 112:18 112:22 192:22 203:8,11		
shortly	284:16	338:17 348:2		207:10 229:24		
show	16:16 18:2 21:22 54:23 62:16 99:7 168:3,6 189:25 191:18 191:24 202:5 211:8 212:7 218:12 225:2,5 225:14 226:4 227:10 228:13 228:15,20,21 228:24 229:12 229:15 233:9 233:15 234:2 236:21 238:18 238:19 243:10 250:10,15	355:6,8,22 374:14,18 381:23 382:2 382:10,15 showed 61:8,10 189:24 199:24 227:5 262:2 275:9 282:20 showing 18:20 38:16,18 243:9 253:16 256:8 256:20 266:25 278:6 283:9 300:22 shown 185:21 270:9 282:22 shradha 68:19 267:19 269:19 271:2,21 275:8 281:5 shut 70:18 138:13 237:4 365:21 sicker 267:6	signature	230:4 186:12,16 206:11 300:10 301:15,21,22 373:19 385:23 27:15 144:24 186:5 202:18 203:2,9,14,16 204:2 208:19 229:15 241:7 249:17,19,20 250:19 251:4 273:13 276:15 290:18 299:25 300:8 302:12 304:6,11,12,16 382:8 significant 4:20 72:11 271:14 signor 269:8,14 269:21 signs 118:7 376:18		
	262:17 272:6 272:18,20,24 273:9 274:3 276:17 277:11 278:18,20				simple	101:16 103:10,12 150:6 170:21 241:3 326:5,19 simplicity
						77:23

[simply - simpson]

Page 77

simply 346:7	71:1 72:1 73:1	139:1 140:1,5	200:1 201:1
simpson 1:3,17 2:6,17 3:4 6:14 6:16,22 7:2 8:1 8:16 9:1,4 10:1 10:11 11:1,22 12:1 13:1 14:1 15:1 16:1,14 17:1,9 18:1 19:1,20 20:1 21:1,21 22:1 23:1 24:1 25:1 26:1,25 27:1 28:1 29:1 30:1 31:1 32:1 33:1 34:1,15 35:1 36:1,25 37:1 38:1 39:1 40:1 40:17 41:1,14 42:1 43:1 44:1 45:1 46:1,18 47:1,6,8 48:1 49:1 50:1 51:1 52:1 53:1 54:1 55:1,12 56:1 56:14 57:1,11 57:21,24 58:1 59:1,19 60:1 60:12 61:1 62:1,21 63:1 64:1 65:1,14 65:24 66:1 67:1 68:1 69:1 69:3 70:1,5,7	74:1 75:1 76:1 76:15,19 77:1 78:1 79:1,23 80:1 81:1,3 82:1 83:1 84:1 85:1 86:1 87:1 88:1 89:1 90:1 91:1 92:1 93:1 94:1 95:1 96:1 97:1 98:1 99:1 100:1 101:1 102:1 103:1,11 104:1,24 105:1 106:1 107:1 108:1 109:1,10 110:1,14 111:1 111:12 112:1 113:1,2,6,19,22 114:1 115:1 116:1,6,24,24 117:1,2,12,21 118:1 119:1,23 120:1 121:1 122:1 123:1 124:1 125:1,2 125:11 126:1,5 127:1,11 128:1 128:2 129:1 130:1 131:1 132:1,10 133:1 134:1 135:1 136:1 137:1 138:1,7,20	141:1,5 142:1 143:1,10 144:1 145:1,25 146:1 147:1 148:1 149:1 150:1 151:1 152:1 153:1 154:1 155:1 156:1 157:1 158:1 159:1,4 160:1 161:1 162:1 163:1 164:1 165:1 166:1,4 166:11 167:1 168:1,2 169:1 169:6,12,16 170:1 171:1 172:1 173:1 174:1,23 175:1 176:1 177:1 178:1 179:1 180:1,12 181:1 182:1,8,14 183:1,16,25 184:1,9,17 185:1,21 186:1 187:1,10 188:1 189:1 190:1 191:1,17 192:1 193:1 194:1 195:1 196:1 197:1,21,25 198:1 199:1,2	200:1 201:1 202:1,12 203:1 204:1,17 205:1 205:10 206:1 207:1,5 208:1 208:5 209:1 210:1 211:1,7 211:19 212:1 213:1,4,7,15 214:1,18,22,24 215:1,8 216:1 216:10,22,24 217:1,22 218:1 218:10,18 219:1 220:1,15 221:1,22 222:1 223:1 224:1 225:1,2 226:1 226:17 227:1 227:19 228:1 228:12 229:1 230:1,11,16,23 231:1,5,14,22 232:1,4,12 233:1 234:1,22 235:1 236:1,25 237:1,14,16 238:1 239:1 240:1 241:1 242:1,9 243:1 244:1,24 245:1 246:1 247:1 248:1,5,17,20 248:24,25

[simpson - soliciting]

Page 78

249:1 250:1,4	308:1 309:1	369:4 370:1,15	smart 285:4,5
250:10 251:1	310:1,13 311:1	371:1 372:1,21	smarter 309:17
251:15 252:1	311:15 312:1	373:1 374:1	smiling 52:6
252:15 253:1	313:1 314:1	375:1 376:1	53:22 59:8,14
254:1,7,13	315:1 316:1	377:1 378:1	100:12 132:6
255:1 256:1	317:1 318:1	379:1,3 380:1	240:20
257:1,24 258:1	319:1 320:1	380:15 386:2,3	smoke 264:12
258:18 259:1	321:1 322:1	386:21	social 98:2
260:1 261:1	323:1,11 324:1	simpson's	software 261:3
262:1,15 263:1	324:24,25	214:15	sold 75:11 84:2
264:1 265:1,20	325:1 326:1,20	single 183:12	84:7,12,15,18
266:1 267:1	327:1 328:1	252:13 300:13	85:21 125:19
268:1 269:1,25	329:1 330:1	sink 202:10	127:21 128:13
270:1,14,15	331:1 332:1	sir 179:2	129:8,15 130:3
271:1 272:1	333:1 334:1	sit 335:22	130:5,14,15
273:1 274:1,14	335:1 336:1	site 328:14	145:10 155:19
275:1,16,18,24	337:1 338:1	sitting 139:3	156:25 157:25
276:1 277:1	339:1 340:1,10	situated 77:23	158:18 190:16
278:1 279:1	341:1 342:1	six 65:23	190:18 277:5,9
280:1 281:1	343:1 344:1	124:16 281:8	326:12,14
282:1 283:1,7	345:1,21 346:1	281:10 328:23	327:10,14,17
284:1 285:1,23	347:1,23 348:1	329:8 362:23	336:15 345:23
286:1,2 287:1	349:1 350:1	skeptical	345:25
288:1 289:1,16	351:1 352:1	302:10	sole 70:14
290:1 291:1,12	353:1 354:1	skipped 150:4	solely 236:7
292:1,9 293:1	355:1,21 356:1	254:25	239:15,21
294:1,8 295:1	357:1,17 358:1	slash 289:16	326:12
295:22 296:1	358:21 359:1	slow 358:2	solicit 361:8
297:1 298:1	360:1 361:1	small 72:10	solicitation
299:1,21 300:1	362:1,17,25	92:24 93:21	209:17 210:2
300:22 301:1	363:1,9,25	94:4 98:6	solicited 275:13
302:1 303:1	364:1 365:1,25	141:10 330:17	soliciting
304:1,2 305:1	366:1 367:1	smallest 95:22	241:22
306:1,6 307:1	368:1,6 369:1		

[solution - statement]

Page 79

solution	358:19	southampton	245:18 336:14	standby	14:8
solutions	2:18	164:15	337:8 366:7	start	18:7
7:15	379:6	southern	spewing	40:23	118:17
somebody	97:16 125:25	237:12,17	sphere	118:19	190:22
128:17	152:18	space	338:11	214:19	329:2,3
265:14	292:17	spanish	spinning	started	45:5
295:10		44:9	131:24 217:18	87:16,20	106:2
something's	273:21	speak	spitballs	107:23	108:14
son	336:2	14:17,22	spoke	162:17,18	108:15 177:23
soon	28:7 29:10	29:21 52:8	163:4 241:13	177:25	197:5
sore	237:24	56:12 250:2,2	sporadic	296:18	
sorry	16:22	370:7 375:13	60:24	starting	342:17
36:23	38:21,24	speaking	99:9	367:13	
42:9	56:10	4:10	square	starts	45:6
72:13	75:8,8	15:6 41:25	2:18	298:14	314:6
75:15	76:3	56:12 325:17	7:11 126:11,18	state	1:2 2:21
87:22	166:6	special	ss	7:6,20,23	8:24
290:16	292:14	377:20	385:4	19:12,13	
319:13	357:24	specific	staff	286:11	312:14
sort	34:8 46:15	50:5	31:3,9	312:22,22	
163:16,17		58:13 215:14	36:6,19 55:9	367:24	385:4,9
164:16	167:18	225:15 261:10	58:18,21,23	stated	4:11 5:8
377:21		specifically	151:22 152:4	23:12	
sought	218:20	21:12 23:2	161:22 331:11	statement	4:13
sounds	15:21	39:12 51:3	331:12	4:23	20:4
367:19		69:14 71:8	staffing	43:13	62:9
source	86:18	213:22 214:13	163:13	182:24	192:4,6
90:10	164:20	214:22 259:17	stage	192:13,15	
195:25	212:6	259:22	62:25	193:13	204:14
sourced	202:2	specifics	63:2,6 64:7	206:14,22	
sources	98:10	12:5	stages	290:6,23	
		161:13 162:19	stamp	367:14	381:14
		specified	176:16	381:18	
		380:11	stamped		
		spellings	345:24		
		41:13	stand		
		spend	28:2		
		13:8	264:8		
		15:2 245:20	standard		
		spent	38:5		
		15:4,14	39:18 188:16		
		15:16 53:12	188:17		
		195:23 245:16			

[statements - stuff]

Page 80

statements	341:21	224:22 228:17	strategy 28:10
4:16 65:19	steven 341:10	254:5 292:14	315:7
66:9 67:15,22	stick 339:22	315:25 316:20	strauss 200:15
67:25 68:3,8,9	sticker 272:22	325:9 343:11	street 3:5 62:11
99:7 122:5	273:6	349:16,17,20	71:18 75:20
123:3 148:9	stickered 18:19	350:2,3,12,18	133:13,13
168:22 202:7	stipulated 5:10	363:4,4,4	139:4 145:24
states 170:14	5:13,16,20	367:2 374:8,8	147:4,10
171:9 172:21	379:3	377:10,10,10	331:24 346:15
174:9 235:14	stole 100:10	378:15,23	351:18 353:11
237:12	110:10,22	stopped 56:4,5	354:5 356:14
status 24:5	111:5 112:18	60:17 78:24	359:21
stay 157:24	112:22 198:4	91:17,19 94:11	strike 20:7
163:25 182:18	201:5,16	95:19 106:3	58:10 91:18
stayed 158:4	207:25 220:24	107:24 111:19	92:16 148:17
staying 53:12	220:25 266:15	114:13,15,20	166:12 175:11
94:20	266:18 287:11	115:2,4,10	212:2,2 255:8
stays 97:16	287:12,15	117:17,22	275:16 285:24
steal 371:19	353:4,5,6,7,8,9	127:7 164:17	289:3 290:2
stealing 56:3	stood 359:4	367:5	293:14 325:3
201:3,10 212:8	stop 87:18,21	stopping	374:5
212:9 228:9	106:20,21,23	111:15	string 361:6
steals 112:24	107:2,2 109:2	store 126:11,17	structure 71:19
steering 338:10	110:5,12,13	128:19 130:12	struggle 69:13
step 29:6 84:23	111:24 113:11	stores 159:22	struggled 74:11
stephen 163:22	116:2,7 127:9	story 124:12	struggling
313:11	128:15 136:5	straight 111:2	34:22 88:2,3
steve 160:14	137:7,7 138:11	127:17 177:10	study 202:24
164:6,11,13	138:13,17	217:19	203:3 247:7
165:21 257:5	142:12 183:4	straightforward	295:24 300:18
257:19 261:19	183:10,21	132:11 135:2	studying 196:3
313:21,22	184:15 209:12	175:25	301:19
320:11 321:9	220:4,19	strategies 80:7	stuff 51:23
321:20 323:4	221:17 223:13	80:12	52:13,16,17,22

[stuff - system]

Page 81

65:4 100:9 139:16 173:5 199:14 203:22 203:23 217:5 258:16 266:18 274:22 305:25 319:15,16 334:15 341:6 372:24 373:19	substance 16:11 48:11 117:5 172:9 376:2 substantive 17:10 21:8,14 284:4 successful 160:19 161:2 succinct 4:23 succinctly 4:11 5:8 sued 200:20 347:4,13 sues 319:14 suffering 25:16 sufficient 230:7 230:8 suffolk 385:5 suggest 4:12 305:7,10 suggested 29:3 53:8 suggesting 16:21 25:24 246:5 suggestion 29:8 305:9 suggestions 20:23 suggests 67:4 suing 1:4 198:16	suit 347:4 suite 3:5 summer 47:11 47:12,14 108:3 108:4,10 117:22 118:6 sunday 19:2 21:4 210:11 sunset 159:20 160:14 support 97:25 191:9 supporting 191:6 278:19 supposed 16:20 51:18 89:10 124:9,10 125:8 125:8 199:12 240:6 242:21 242:23 277:4 342:14 373:12 supposedly 90:24 supreme 1:2 7:6 sure 10:21 30:5 34:14 36:14 37:3 42:7 76:12 99:6 102:15 122:7 131:5,16 134:15,15 136:24 143:25 149:25 157:10	157:14,15 171:25 176:11 186:25 195:3 222:16 225:16 225:17 246:17 247:14 264:4 268:7 292:23 294:23,24 306:24 320:15 321:2,21 340:16 342:6 345:23 346:4 347:6 356:17 356:20 363:11 374:21 376:13 376:13 378:12 swear 8:19 348:9 switched 327:21 373:20 swore 297:2 sworn 8:23 380:5,18 385:12 386:22 syphoning 163:23 system 38:7,9 38:10,14,15,21 38:22,24,24 39:2,21 40:11 40:19,21 45:20 45:21 46:6,8 46:12 55:4 56:6 282:22
---	--	--	--

[system - telling]

Page 82

312:15 373:6	340:2 347:23	318:17 346:17	43:9,10 50:11
systems 36:13	348:20 350:22	357:3 374:17	53:2 54:14
61:6 230:25	355:23 358:3,7	378:16,23	70:7 90:22
371:2	363:12,19	talks 230:2	94:6 105:12,15
szkarlat 279:19	365:13 368:5	359:3	105:25 107:23
282:5	371:25 372:21	tally 149:6	118:18 120:23
t	376:25,25	155:20	121:8 127:24
t 107:19 345:4	377:17 379:10	tan 262:4	133:3 140:8
380:2 381:2	taken 4:8 6:14	tasked 31:13	142:15 144:17
385:2,2	17:6 47:18	tasks 42:23	145:12 147:19
table 318:22	70:15 104:20	tax 23:9 24:19	150:16,17
319:2,3,6	116:20 140:2	25:9,11 26:2	151:7 158:2
tail 26:4	211:3 234:22	26:15 27:3	162:13 171:13
tails 157:23	261:5,6 285:19	28:22,22 30:15	172:10 174:4
take 6:10 11:12	323:12 353:21	30:18 49:5,8	174:17 182:18
18:15 21:24	358:4 363:25	49:12 50:4,6	195:21,22
22:25 24:18	364:7 370:12	52:10 62:24	203:13 204:2,3
29:23 39:17	370:17,24,24	102:5,11,16,19	219:22 237:21
46:4 54:8,9	takeover 61:14	102:24 103:8	241:24 247:4
65:17 76:15	91:24,24 92:10	103:14,17,24	261:23 266:6
88:10 89:2	takes 219:14	104:10 124:10	270:9 277:4
104:15 121:23	talk 33:16	125:10 371:9	279:7,8 280:8
136:3 169:15	35:14 109:4	384:7	280:10 282:23
175:5,7 206:8	140:5 162:17	taxes 124:16	284:11 300:18
210:3,7 211:16	218:2,5 260:24	188:2	304:14 317:19
225:6 234:19	talked 317:15	team 56:5	321:3 323:5
245:3 247:17	357:23	technical	329:10 339:23
257:16,18	talking 35:10	153:12	340:10,17,23
267:3 272:20	35:11,14 116:8	teed 350:5	365:11 372:11
285:13 311:2	154:10 161:20	telephone	377:6,8
320:3 327:9,25	164:17 183:10	29:22 360:11	telling 41:20
331:10 332:13	183:21 184:15	tell 10:21 11:7	62:5 106:3
335:16,17	209:9 220:5,20	12:20 29:18	110:19 125:7
	221:17 271:20	34:13 41:21	137:12,15

[telling - think]

Page 83

142:20,21	terminating	61:3 65:8,8	things 20:10,17
164:10 210:10	213:8	75:13 76:12	35:24 38:2
239:10 276:6	termination	85:23 123:24	46:23 51:16
294:3 295:25	244:25 285:24	123:24 124:3	65:2 92:6
315:24 366:21	293:10,16,18	190:14 191:5	102:8,14
369:16	terms 157:11	198:3 201:19	127:24 138:9
tells 319:10	232:2 249:6,9	314:16 345:19	143:24 154:2
temporary	terrible 161:7	368:25 372:17	159:2 163:8
25:23 253:25	319:17 333:14	376:3 378:24	202:8 204:9,9
339:9	teslas 163:7	thanks 113:5,8	204:10 208:22
ten 22:21 76:16	testified 8:25	113:10 276:20	212:7 215:3
99:18 161:13	384:5	279:22	217:18 224:4
165:8,9,13	testify 264:5	theft 201:24	241:22 260:2,4
166:2,8 247:5	306:6 370:2	208:13 222:7	260:7 279:9
255:25 296:21	380:5	223:25 228:8	297:6 302:8,9
tenant 71:19	testifying 5:22	theirs 16:21	315:2 328:6
97:11,20,23,24	testimony 9:15	theory 72:22	350:12 353:9
tenants 71:23	9:20 10:6 11:4	therefor 4:23	373:12,20
72:5 73:3	16:12 33:13	thereto 306:7	374:16 375:7,8
114:7	76:13 91:16	thief 112:25	think 12:5
tend 43:18	101:13 297:17	280:7	13:14 17:16
160:23	298:3 302:11	thing 16:7 32:7	30:9 31:2
term 71:5	302:14,15,18	34:24 45:25	34:24 43:22
97:16 152:22	303:6 363:19	59:22 66:23	44:14 47:13,24
177:22,25	369:5,18 379:2	101:7 129:21	63:12,15 72:8
285:5 304:23	380:6,10	146:19,25	73:24 77:14
terminate	385:14	147:17 158:21	79:7 80:14,16
163:18 230:17	text 164:7	167:14 200:16	84:17 87:23
230:17 248:8	335:2,13,14	200:16 238:2	99:5 102:18
248:11 286:2	338:13 383:8	250:22,25	142:5 144:2,3
287:4	texts 335:11	260:19 295:2	146:25 147:7
terminated	th 271:12	301:13 305:2	147:13,14
163:24	thank 8:18	328:8 330:12	148:3 151:11
	14:10 55:25	335:6 337:9	160:21 166:2

[think - time]

Page 84

166:15 167:22	360:6	330:15 350:10	342:2 357:24
184:7 187:21	thorne 3:14 8:5	358:17	tic 72:5
194:14,15	8:5 38:16	thousands	tied 27:7 153:6
195:2,3 199:6	51:20 55:25	53:15	237:7 323:18
199:6 208:9	65:8 100:12	thread 206:3,5	tier 24:22
214:8 219:25	185:10 203:22	208:21 339:12	time 2:13 6:8
220:10,14	204:6 209:9,18	threat 183:24	7:21 15:2,3,13
223:8 224:11	210:13 222:5	threatened	17:25 31:14
224:14 236:20	224:11 237:20	111:4,6,25	34:19 38:4
237:22 241:7	238:8 240:23	112:15,18	40:9 45:6
245:10,11,15	248:13 250:5	threatening	47:19 48:3,14
251:23 261:19	252:11,14	183:17	57:3,25 58:2
262:10 264:16	282:25 302:8	threatens	58:15,19 60:17
273:18 276:21	304:20 309:11	112:21	63:17,20 68:17
280:6,11	353:8 362:24	threats 111:9	68:24 69:24
284:17 285:3	363:11,18,24	three 41:24	73:25 84:12
300:24 307:2,4	364:16,19,25	44:8 46:2	99:11 101:15
307:20,21	365:7,14,22,25	47:23 51:2	102:5,10,15
320:14 321:21	366:10,18	65:21 94:10	106:6,6 107:14
324:4,6 330:2	367:4,11,16,23	96:7,10,11	108:19 110:5
331:15 332:6	368:9 369:3,9	118:20 162:24	117:4 119:18
335:21 340:19	369:16,23	163:11 167:24	119:24 120:15
340:22 342:17	370:8,16 374:4	171:7 190:24	120:25 125:25
344:10 346:4	376:7,14,20	194:21 198:19	128:17 130:8
362:6 367:19	377:12 378:17	199:18 211:6	150:2,3 151:7
369:23 375:3	379:8 383:23	218:18 225:15	152:23 155:9
thinking 240:3	thought 16:19	225:16 235:11	155:11 165:6,7
240:8	163:2 373:7	241:5 265:15	165:24,25
thinks 71:13	thoughts 117:3	275:24 277:17	166:8,25
208:19	thousand 54:17	285:11,17	167:17 172:8,9
third 27:7	81:10,22 83:7	290:17 295:8	172:19 176:12
95:23 174:25	92:25 93:22	295:10,21	177:7 181:16
225:25 226:3	95:17 98:14	298:11 329:11	181:20 182:10
251:17 330:25	101:11 329:2	329:12 336:15	183:12 184:12

[time - top]

Page 85

184:25	186:2,3	309:17	329:18	today's	13:9	270:23,23
219:14	245:7	332:4	357:23	14:12	379:2	271:7
246:9,24		357:24,24		together	163:3	275:22
251:12	258:21	371:6	372:8	188:12	208:18	277:6
259:17	260:18	373:5	378:6,15	302:17	313:20	304:9
275:11	277:4,9	title	234:14	318:11	324:9	309:16
277:14	282:21	titled	325:7	328:6		312:24
285:8	297:4,6	today	9:7,15,21	told	15:25	313:3,3
297:8,15		10:11,20,22		17:13	17:9	347:12
298:25	299:6	11:4,18	13:2	20:13	25:14	354:6,7
309:21	327:24	13:17	16:5,16	29:13	52:10	359:8
332:10	337:9	32:12	33:20	54:5	59:16	371:6
338:9	340:7	34:10	45:13,14	60:22	72:25	372:15
349:13	355:18	50:13	52:8	83:6	86:8,16	tonight
362:21	363:16	55:12	56:18	94:6	95:8,10	tons
365:8	367:6	57:12	64:4,15	101:4,10	102:7	189:6
368:23,25		64:19	67:3	116:4	124:15	took
380:10		73:23	74:10	130:19	158:16	92:6
times	2:18	7:10		163:3	164:8	114:17
17:14	20:21		75:11	164:8		116:24
27:22	67:12	119:7	133:8	167:17	170:7	274:25,25
99:9	114:5	138:22	139:3,5	170:16	174:20	275:4
123:10	124:17	143:13	166:3	190:15,23		282:24
130:2,21	133:4	167:19	195:22	195:21	201:17	331:6
152:9	157:15	205:23	209:19	201:21	206:4,6	373:6
163:15	165:21	210:14	254:3	208:23	209:11	tools
165:24	171:7	270:11,23,23		219:20,23		326:2
195:24	218:18	298:3	300:17	221:15,19,20		top
222:6	228:3	338:17	348:14	221:23	222:6	12:13,22
248:4	255:25	359:23	363:20	224:6	237:24	24:21
265:6	270:10	364:11	369:4	238:8	239:4	33:15
272:4	275:8	369:17	370:5	240:18	242:23	42:8,20
277:2	281:22	370:17	374:9	248:15	250:6	44:14
282:20	305:10	375:9	376:5,9	252:11	255:25	71:6
		377:14,17,22		256:3,4	263:13	84:14
						95:18
						104:7
						105:11
						107:6
						150:17
						167:23
						187:16

[top - trying]

Page 86

195:5,20	train 25:2	179:5,14 180:2	206:24 207:2
203:19 212:7	trained 167:14	180:15 181:6	264:9 282:15
212:18 225:13	transaction	195:9 197:9	317:6,24
225:22 226:8	37:25 76:23	201:13	318:12,12
233:11 234:11	276:9,10,11,13	transferred	380:9 385:13
234:12 245:22	transactions	149:14,16,18	trust 53:22
246:13 281:25	35:24 39:25	151:5 196:22	54:6 272:14
286:24 288:12	56:24 62:20	transfers 39:18	trusted 53:20
295:23 300:14	77:10 144:21	39:19 141:5,24	truth 125:7
301:25 329:10	145:7,8 152:15	143:3,4,7,10,16	164:18 210:10
331:17 367:23	191:22 231:25	145:3,5 146:2	261:24 380:5
topics 15:15	232:2 249:4,5	146:15 187:4	truthful 9:14
100:8	276:2,5	194:22 277:2	11:4
total 96:15	transcribed	transition 90:2	try 36:3 112:3
165:4 194:6,10	9:20	trend 43:17	119:11 129:16
379:4	transcript 5:10	trial 2:16 5:14	271:22 282:17
totally 369:11	9:24 214:7	tricky 95:11	336:23 361:8
touch 27:21	217:14 218:15	tried 27:21	trying 12:5
51:16 128:20	364:18 365:6	54:22 95:23	22:6 34:21,25
touched 39:14	367:2,10 380:9	103:21 111:25	35:20 40:7
40:19	380:9	112:7,10 127:5	41:12 49:9
touchy 69:12	transfer 39:5	130:20 182:23	95:25 97:22
toward 66:12	143:14 144:18	184:14 191:9	117:4 121:23
towards 23:8	148:20 150:24	221:20 237:4	127:8 128:15
30:16 122:24	151:3 158:23	335:23 336:3,4	136:4 172:12
trace 197:6	170:5,10,14	336:24 337:4,7	173:20 184:23
track 53:23	171:8 172:2,16	337:11 339:10	207:7 210:9
60:18,20 66:16	172:21,25	341:6 354:24	221:5 241:18
125:3,4	173:11,15,25	trigger 92:12	250:3 255:6
tracker 50:2	174:8,13,18	tro 234:14,15	262:23,23
trade 108:23,23	175:10,13,19	trouble 154:7	267:6 292:13
traditional	175:24 176:5	truck 334:13	325:14 330:2
119:22	176:24 177:7	true 138:21	357:25
	178:10,16	139:2,7 182:3	

[tunc - units]

Page 87

tunc 316:23	193:4 197:23	unclear 66:17	understanding
turn 22:20	208:17,24	73:18	66:11 107:11
65:15 162:22	210:25 219:3	uncomfortable	132:18 133:2
169:3 171:18	219:12 241:4	16:2 94:25	247:12
171:20 173:9	241:12,16	118:22	undertaken
176:14 178:3	246:21 255:11	uncommon	215:5
178:20 179:16	258:11 289:25	97:20	undertaking
191:13 193:2	290:4 295:9	under 9:8	344:7,11
193:25 202:12	298:13 309:8	25:22 32:10	unfettered
204:13 351:8	313:16 320:17	51:21 53:5,6	272:3
turnover	322:15,19	55:18 58:3	unfortunate
167:15	323:18 329:11	61:14 71:5	25:15
twice 17:16	329:12,21	76:24 78:2	unfortunately
265:5 323:14	331:15,16	89:15 97:7	14:24 15:3
two 12:15 15:7	333:7,12	115:8 136:15	66:14 74:14
18:7 25:12	344:24 350:4	137:23 164:2	93:4 94:9,12
27:24 28:18,19	350:12 353:9	166:2 187:23	94:15 160:13
34:24 43:14	370:7 371:16	191:11 206:25	330:16 358:14
44:3 46:3	type 42:22	207:10 211:10	367:17
55:17 60:18,19	108:11 283:25	216:13 252:6	uniform 4:2 5:2
60:21 65:21	types 115:23	255:13 258:11	unilaterally
71:19 72:3,4,9	187:4	284:2 288:19	248:6
73:17 76:3	u	297:2 299:25	uninvolved
77:17 84:13	u 345:4	304:22 339:22	369:11
97:2 98:20	ucc 177:24	341:22 342:15	unit 6:12
104:23 115:21	ugly 94:17	358:22	104:17,22
116:25 118:20	unable 85:25	understand 9:7	210:24 211:5
119:3 130:14	unauthorized	9:10,13,19,23	285:21 311:8
134:10,11	357:7	10:8,10,16	311:13
144:13 149:8	unavailable	40:8 151:21	united 170:14
155:14 159:22	367:17	154:11 194:18	171:9 172:21
159:24 160:2,5	unaware	208:22 221:6,7	174:9 237:12
160:9 167:24	351:20	247:5 322:24	units 379:4
178:21 182:2		323:9 376:23	

[unoccupied - voila]

Page 88

unoccupied	useless 264:18	vehicle 277:23	14:8 17:3,7
82:17	user 269:17	324:23 325:2,7	104:16,21
unpaid 188:4	username	328:25 333:4,6	116:10,17,21
240:13 354:4	272:4 321:17	vehicles 38:3	117:11 139:23
unreasonably	using 55:5	156:25 158:18	140:3 166:4
255:5	107:15 108:2	324:17,22	210:23 211:4
unrelated	323:16	334:21	277:16 285:10
130:17 145:4	usual 124:8	veltri 2:20 7:14	285:15,20
updated 23:9	usually 312:10	385:8,24	311:7,12 340:9
updates 31:11	328:12,24	vendor 33:4	355:19 370:9
359:3	utilized 5:14	venture 160:17	370:13 378:25
ups 318:13	93:24	verbal 11:15	view 27:17 29:4
upset 333:16	utilizing 31:4	verifiable	63:21 68:11,12
upside 149:5	utter 65:11	97:25	68:13,15,17
upstairs 86:21		verify 95:5	69:5 153:5
160:7 180:17	v	187:15 301:17	306:25
180:18,21	v 12:9 386:2	375:16,18	viewing 78:4
use 38:7 42:24	vacant 85:15	veritext 2:18	231:6 254:15
55:13 88:22	100:22 109:11	7:10,15 379:5	321:13
94:23 118:12	109:14 110:22	386:1	views 133:19
118:15 149:3	vague 315:9	version 71:21	133:21
269:16,23	variety 35:21	71:21 73:19	vin 327:21
323:19 325:10	44:5 71:3 98:9	204:3	vins 334:20
325:11 355:22	various 13:3	versions 71:20	violation
371:3 373:15	15:15 24:9	versus 42:2	348:22 349:8
used 20:24,25	30:19 35:23	93:14 107:11	354:7 383:12
49:25 54:2	36:5,19 49:4	237:14	violations
89:16 93:3	53:7,15 55:2	vest 331:11	350:19 354:4
98:16 147:14	61:4,22 62:6	video 6:9,13	virtue 220:20
150:4,15,20	63:3 74:22	videoconfere...	vis 51:13,13
309:7 325:6	81:17 98:16	3:19,22,23,23	void 213:10
327:5 328:24	140:16 150:19	videographer	244:25
343:8 379:4	195:13 336:10	3:22 6:2 7:13	voila 103:9
		8:11,14,18	

[voluntarily - we've]

Page 89

voluntarily	walk	42:12	302:20 307:16	watched
321:9		348:17	308:6,9 310:8	318:24
voluntary	want	19:21	333:10,13	water 105:4
287:25 288:9		24:14 33:24	334:23 336:23	109:23 137:10
382:20		40:18 41:11	339:4 352:11	188:3
volunteer		42:5 48:20	354:21 357:13	way 20:22 21:2
228:19 233:5		54:18 56:11	368:3 373:17	27:20 47:25
volunteered		69:4 76:6,12	374:14	54:21 81:24
47:2		76:14 87:22,23	wanted 124:23	85:20,25 93:12
volunteering		90:3 95:24	157:19,23	94:17,25
223:13 224:22		98:5 100:4,9	161:7 202:3	111:16 118:22
254:5		109:3 112:17	237:3 337:4	119:19 123:14
vomit		116:14 117:15	339:9,20	123:18,22
	w	119:21,21	363:11	124:20,23
w		134:6 141:22	wanting 329:24	127:3 137:2
w2		142:18 143:4	wants 38:22,25	151:8 152:5
wage		157:24 158:3,9	39:3 62:16	157:15 159:2
wagging		159:6,11	93:12 103:5,7	161:19 163:12
wait		161:12 162:4	103:14 134:2	165:2,3 172:10
11:18		162:19 165:12	135:18 136:3	180:7 181:2
57:19 70:6		165:15 167:8	152:18 197:6	183:15 187:14
131:11 138:11		183:2 189:3	221:22 330:20	194:13 195:6
175:4 191:14		208:9 209:14	warned 208:4	199:22 203:19
191:15 193:6		210:21 223:8,9	warning	209:3 220:2
201:22 245:23		223:11,12,15	206:12 208:6	236:22 238:3
264:10 283:5		237:5,20	warrant 222:18	242:21 266:20
347:20 353:25		238:15 241:2	222:21	277:25 280:9
waiting		244:2 247:16	warranty	297:10,16
229:2 288:5		250:3 257:17	329:20	305:4 310:13
waive		265:16 266:10	wasting 181:15	343:24 385:18
307:14		269:8,8,15,22	184:12,13	ways 98:11
waived		278:24 284:11	364:20 368:22	119:22 173:23
4:5		284:12 287:20	watch 164:2	we've 13:18
5:17		292:25 295:24	185:16 336:22	15:14 30:4
waiving				
363:15				

[we've - work]

Page 90

69:23 70:17	280:9	wiped 89:7 182:17 206:3 291:15	wonderful 61:9 wondering 52:14 338:8
84:20 149:25	wheel 338:10	wire 39:5,18,19 169:23 171:22 179:19	word 17:15 94:24 195:12 238:12 245:15
150:4,18	whereof 385:20	wis 262:4 wish 338:8	246:11,22 310:23 358:12
165:21,23	whine 126:11	wished 191:19	words 19:22 44:9 246:20
166:24 167:3,6	126:17 128:19	withdraw 297:15 355:15	295:17 303:17
167:11 202:6	130:12 280:19	withdrawal 254:2	303:21 304:18
277:16 285:10	280:20,25	withdrawn 229:22	306:16 309:7 315:9
309:16 340:4	338:20	withdrew 124:18 224:17	work 32:8 43:2 43:20 44:6,18
week 22:18	whispering 6:7	241:25 242:3	46:18 47:4,7,8
27:23 28:18	185:9	262:6 264:13	53:5 55:4
45:14 46:3,3	whitehead 45:3	315:25 319:13	89:23 97:20
48:9,9 94:21	wholeheartedly	344:2 348:15	118:5 131:25
146:24 151:25	215:25	348:16 353:9	132:2 137:5,6
238:10 324:13	wiener 3:22,23	wiener's 51:20	152:16 166:8
weekend 164:8	13:15 52:13	371:23	167:8,19
weekends	124:18 224:17	wieners 24:4	248:13 259:18
94:22	241:25 242:3	43:4 52:17	260:13,20
weeks 28:18,19	262:6 264:13	65:9 88:13	265:16 280:8
33:5,7,12	315:25 319:13	354:19 373:23	281:15,18
219:3,12	344:2 348:15	wife 15:25	294:10 299:19
265:15 321:15	348:16 353:9	79:23 140:15	325:7 328:4,17
333:12	wiggin 344:22	wiggin 344:22	328:19 330:11
went 92:6	william 44:8,25	willing 240:22	330:14,14
148:25 150:7	willing 240:22	win 134:23	349:8,16,17,20
182:10 191:9	win 134:23		350:2,3,11,12
199:10 201:17			350:15,18
248:12 329:17			
332:2 333:18			
350:8 354:19			
354:22,24			
361:10,11			
west 3:5			
whatsoever			
142:25 156:18			

[work - yeah]

Page 91

360:2	world 29:5	291:4,8 372:12	175:8 177:4
worked 23:22	108:12 159:13	wrote 21:3	180:8 181:13
30:22 37:8	167:11 189:5	263:10,12,14	181:19 182:16
44:22 47:13	276:14,22	264:15,22,25	184:11,11,11
48:8 55:16	373:7	265:9,22,23	186:22,25
56:6 167:2	worried 297:12	266:10 270:11	193:16,24
217:23 244:16	worst 110:5	279:6,9,10	194:8 195:10
280:10 292:16	worth 161:21	284:14,18	197:11,11,15
295:13 299:13	319:17 336:15	306:10 316:25	201:5 205:6
324:16 325:2	would've	317:9 338:5,6	206:21 217:2,4
workers 42:21	276:15	338:7 357:5	217:5,11
43:2 44:21	write 46:5 63:9	375:19	219:16 221:14
151:22 374:20	237:18 281:7	x	229:10 230:21
working 23:8	283:2 284:16	x 1:3,10,23 2:2	231:3 233:21
24:6 30:16	340:20 375:14	2:11 381:2	234:20 240:24
31:9,10 39:11	writer 38:21	383:19	243:16,18,19
42:15 43:25	writers 38:13	y	244:11,15,22
47:10,11,21	38:14,15	y 8:22 38:11	245:2,5,25
60:25 66:12,15	writes 283:22	49:23	249:15,23
149:6 265:17	283:23 284:9	yael 46:18	250:8 251:6
283:3 295:9	284:10 333:3	79:23	252:5,8,16
296:18 297:9	336:8	yeah 12:17	253:24 257:6,8
297:10 298:14	writing 45:22	34:14 36:20	260:23 263:4,8
298:24 350:9	222:10 282:3	41:16,19 57:14	265:8 266:12
360:24	303:8,11 333:9	61:7,7 81:24	267:24 269:6
works 32:10	336:13	84:11 86:12	273:10,10
94:14 98:12	written 45:23	100:7,25 103:9	279:21 280:15
182:19,19	91:9 215:6	112:23 115:18	283:20 284:18
189:20 238:13	222:11	117:11 122:7	289:18 291:9
265:13 279:21	wrong 15:14	124:2 136:24	291:19 293:4
283:4 293:25	177:24 199:24	145:23 146:3,8	301:9 316:13
296:9 359:24	218:14 221:16	155:17 168:13	316:23 317:11
360:6	235:15 236:17	168:19 169:21	318:15 326:21
	239:11,11		328:11 335:9

[yeah - à]

Page 92

349:3 351:10	329:21 334:17	199:2 201:4,12	100:18,22,23
351:12 352:21	334:20 335:9	343:10,21	110:8 111:5,12
353:3 355:9,14	335:23 337:18	361:21 362:5	111:22 120:11
356:25 366:9	358:3	381:10	162:23 180:18
374:11	yechield 49:20	york 1:2,2 2:19	224:21 280:9
year 23:11 48:7	49:24,25 52:25	2:19,21 3:5,5	317:5 318:18
56:21 63:15	yellow 273:6	3:10,14,14,18	318:18,18,18
67:12 68:13,16	yesterday	3:18 7:7,7,10	338:20 350:20
85:16 87:7	14:25 15:2	7:11,11 8:24	357:11,11
88:16 92:19,21	68:16 245:16	19:13,13 97:12	369:5
99:17 102:17	245:19,20	97:21 126:16	zoom 8:12
105:16,25	yj 1:17 6:23	128:10 139:10	à
106:12 110:3,6	65:23 79:20	237:13 286:11	
112:6,6 134:13	99:5 140:6,7	291:22 301:25	
146:18 155:19	141:6,15	312:14 349:22	
156:9 164:4	142:10 143:13	385:4,10 386:1	
166:12,14,19	143:20,23	yup 160:14	
166:19,20,21	144:3,16	175:18 176:21	
166:23 167:14	145:19 146:9	191:22 192:11	
240:7 282:14	146:17,21	193:19,22	
305:16 317:19	147:3,12,21	225:8 315:18	
323:7 329:6	148:6,13,19,21	332:19 348:25	
337:2 338:8	149:3,5,19,23	349:6	
350:14 372:6	150:7,25	z	
years 12:15	151:10 152:7	zelle 46:10	
24:6,7 25:12	168:9,12,24	98:21,22 99:10	
25:15 48:16	170:6 172:3	99:11 323:12	
52:4,5 53:8,12	173:5,16	323:17,20	
87:7 89:23	175:16,22	324:5	
144:6,7,8,13	176:20 177:3	zero 82:12,13	
146:13 150:5	178:7,11,24	82:17 85:3,4,7	
158:6 160:18	179:6,20 180:3	85:8,13 86:3	
160:22 191:4	194:2,10	86:11 100:16	
206:18 264:12	195:13 196:4		

New York Code
Civil Practice Law and Rules
Article 31 Disclosure, Section 3116

(a) Signing. The deposition shall be submitted to the witness for examination and shall be read to or by him or her, and any changes in form or substance which the witness desires to make shall be entered at the end of the deposition with a statement of the reasons given by the witness for making them. The deposition shall then be signed by the witness before any officer authorized to administer an oath. If the witness fails to sign and return the deposition within sixty days, it may be used as fully as though signed. No changes to the transcript may be made by the witness more than sixty days after submission to the witness for examination.

DISCLAIMER: THE FOREGOING CIVIL PROCEDURE RULES ARE PROVIDED FOR INFORMATIONAL PURPOSES ONLY. THE ABOVE RULES ARE CURRENT AS OF APRIL 1, 2019. PLEASE REFER TO THE APPLICABLE STATE RULES OF CIVIL PROCEDURE FOR UP-TO-DATE INFORMATION.

VERITEXT LEGAL SOLUTIONS

COMPANY CERTIFICATE AND DISCLOSURE STATEMENT

Veritext Legal Solutions represents that the foregoing transcript is a true, correct and complete transcript of the colloquies, questions and answers as submitted by the court reporter. Veritext Legal Solutions further represents that the attached exhibits, if any, are true, correct and complete documents as submitted by the court reporter and/or attorneys in relation to this deposition and that the documents were processed in accordance with our litigation support and production standards.

Veritext Legal Solutions is committed to maintaining the confidentiality of client and witness information, in accordance with the regulations promulgated under the Health Insurance Portability and Accountability Act (HIPAA), as amended with respect to protected health information and the Gramm-Leach-Bliley Act, as amended, with respect to Personally Identifiable Information (PII). Physical transcripts and exhibits are managed under strict facility and personnel access controls. Electronic files of documents are stored

in encrypted form and are transmitted in an encrypted fashion to authenticated parties who are permitted to access the material. Our data is hosted in a Tier 4 SSAE 16 certified facility.

Veritext Legal Solutions complies with all federal and State regulations with respect to the provision of court reporting services, and maintains its neutrality and independence regardless of relationship or the financial outcome of any litigation. Veritext requires adherence to the foregoing professional and ethical standards from all of its subcontractors in their independent contractor agreements.

Inquiries about Veritext Legal Solutions' confidentiality and security policies and practices should be directed to Veritext's Client Services Associates indicated on the cover of this document or at www.veritext.com.