

**Excerpts From John Kunz
Deposition Transcript
June 21, 2016**

From Article at getoutofdebt.org

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
ORLANDO DIVISION

FEDERAL TRADE COMMISSION and
OFFICE OF THE ATTORNEY GENERAL,
STATE OF FLORIDA,

Plaintiffs,

CASE NO: 6:16-CV-982-ORL-41TBS

vs.

LIFE MANAGEMENT SERVICES
OF ORANGE COUNTY, LLC, et al.,

Defendants.

DEPOSITION OF: JOHN DAVID KUNZ

DATE TAKEN: Tuesday, June 21, 2016

TIME: 9:07 a.m. to 12:13 p.m.

PLACE: Offices of Akerman, LLP
420 South Orange Avenue
Suite 1200
Orlando, Florida 32801

PURSUANT TO: Notice by counsel for Receiver
for purposes of discovery, use at
trial or such other purposes as are
permitted under the Florida Rules
of Civil Procedure

BEFORE: Denise Smith Byer, RPR, FPR
Notary Public, State of
Florida

Pages 1 - 144

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ALSO PRESENT:
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E X H I B I T S

	Description	Marked
Exhibit 7	Skype Conversation (Exhibit 7 not attached at time of transcription.)	119

1 JOHN DAVID KUNZ,
2 the witness herein, being first duly sworn on oath, was
3 examined and deposed as follows:

4 DIRECT EXAMINATION

5 BY MR. BERNET:

6 Q. Please state your name.

7 A. John Kunz.

8 Q. Kunz is spelled K-U-N-Z?

9 A. Correct.

10 Q. Do you have a middle name?

11 A. David.

12 Q. Mr. Kunz, where do you live?

13 A. Orange City.

14 Q. What's the address?

15 A. [REDACTED]

16 [REDACTED].

17 Q. How long have you lived there?

18 A. Three years.

19 Q. Do you own?

20 A. I rent.

21 Q. You rent?

22 A. Yes.

23 Q. All right. So for today's purposes, we're
24 having what's called a deposition. Have you given a
25 deposition before?

1 Q. Vape, V-A-P-E, Shoppe, S-H-O-P-P-E?

2 A. Not the Vape Shoppe specifically. I'm familiar
3 with Vape.

4 Q. What Vape is?

5 A. Right. Right.

6 Q. But you've never heard of the Vape Shoppe?

7 A. Not to my knowledge.

8 Q. What about Creative Pyrotechnics, you ever
9 heard of that company?

10 A. Never.

11 Q. Danny Quintero?

12 A. Do not know.

13 Q. Amaris Lenon?

14 A. Employee at the office.

15 Q. One you supervised?

16 A. Did not supervise her.

17 Q. What about Lea Brownell?

18 A. Again, I know her through the office. Not one
19 of my people I supervised.

20 Q. Randi, with an I, Stickles?

21 A. Familiar with her, yes. She was an employee
22 there.

23 Q. Did you supervise her?

24 A. I supervised her.

25 Q. How long did she work there?

1 dialer?

2 A. I'll plead the Fifth.

3 Q. Have you ever heard of Total Security Vision?

4 A. Never heard of it.

5 Q. Have you ever heard of Netblink Communications?

6 A. Not familiar.

7 Q. Have you ever heard of Total Financial

8 Management?

9 A. Never.

10 Q. Do you know who Mohammad Ullah is?

11 A. I do know who Mohammad Ullah is.

12 Q. Who's Mohammad Ullah?

13 A. He was the gentleman I would message back and
14 forth when I needed volume raised or decrease.

15 Q. What does that "volume raised or decreased"?

16 A. Amount of phone calls.

17 Q. Coming into Life Management Services?

18 A. Correct.

19 Q. For the room that you were supervising?

20 A. Correct.

21 Q. Was there anybody other than Mr. Ullah that you
22 would communicate with when you needed volume increased
23 or decreased?

24 A. Whoever would be a part of the Skype
25 communication. That was the office that we communicated

1 with.

2 Q. Okay. Did Mr. Ullah have a Skype handle like
3 you have John.Kunz?

4 A. I believe so.

5 Q. Do you remember what it was?

6 A. I don't.

7 Q. You don't remember anybody else other than
8 Mr. Ullah that you would be communicating with?

9 A. No. It was primarily Mr. Ullah.

10 Q. Okay. Do you know somebody named Justin
11 Ramsey?

12 A. Not at all.

13 Q. Okay. Have you ever seen a Total Security
14 Vision Skype handle?

15 A. Never. You said Total Security Vision?

16 Q. Right.

17 A. No.

18 Q. Where is Mr. Ullah located physically?

19 A. I don't know.

20 Q. Is he in the United States?

21 A. I imagine so. But I do not know where he's
22 located.

23 Q. Okay. So how would Mr. Ullah, to the best of
24 your understanding, increase or decrease the call volume
25 coming into --

1 A. I don't know.

2 Q. I'm sorry?

3 A. I do not know.

4 Q. If you asked him to increase it, he would
5 increase it?

6 A. Correct.

7 Q. If you asked him to decrease it, he would
8 decrease it?

9 A. Correct.

10 Q. Did you discuss with Mr. Ullah the parameters
11 of the types of calls you wanted coming in, aside from
12 the volume?

13 A. I don't understand the question.

14 Q. Okay. I mean, could you say if you want more
15 calls from this area code or -- could you say that, for
16 example?

17 A. I'll plead the Fifth.

18 Q. Could you say we want more calls from a certain
19 ZIP code?

20 A. I'll plead the Fifth.

21 Q. Could you say we want more calls from certain
22 age demographics?

23 A. I'll plead the Fifth.

24 Q. Have you ever met Mr. Ullah in person?

25 A. I have not.

1 Q. Have you ever met anyone that you understood to
2 work with Mr. Ullah in person?

3 A. I have not, no. Actually I think I did meet
4 Mr. Ullah one time. Where exactly? I can't remember.
5 But I do believe I have met him. But I don't have any
6 real relationship with him outside of that. I met him
7 once before, yes, I believe.

8 Q. Putting aside LI and debt elimination, are you
9 aware of any other products or services that Life
10 Management Services sold?

11 A. I am not.

12 Q. Did you ever talk with Mr. Ullah about
13 sending you calls for people who wanted home security
14 systems?

15 A. No.

16 Q. Did you ever talk with Mr. Ullah about sending
17 you calls from people who wanted to buy topical pain
18 cream?

19 A. I'll plead the Fifth.

20 Q. Okay. Did Life Management Services sell
21 topical pain cream as far as you know?

22 A. I'll plead the Fifth.

23 Q. Do you know a company called Visram?

24 A. No.

25 Q. Do you know a company called City Tech Guys?

1 Q. Based on your training. I don't mean to
2 suggest that it was completely random, but there are a
3 lot of factors, so you have to use some discretion and
4 all that, right?

5 A. Correct.

6 Q. Okay.

7 MR. BERNET: Ms. Knutton, anything else or
8 anybody on the phone?

9 MS. KNUTTON: Nothing here.

10 MR. DOAN: I think I'm all set, as well.

11 MR. BERNET: If we transcribe this -- your
12 attorney can explain reading to you.

13 MR. MOENCKMEIER: We'll read.

14 MR. BERNET: We're not ordering it yet or at
15 least I'm not.

16 MR. BERNET: If it happens.

17 THE WITNESS: Ordering what? I'm sorry.

18 MR. BERNET: He'll explain that to you.

19 MR. DOAN: We can discuss the logistics of
20 reading the transcript off record.

21 MR. BERNET: We will need a fairly quick
22 turnaround, do you think, or do we need this for
23 tomorrow?

24 MR. DOAN: I don't know off the top of my head.
25 That's a distinct possibility.

1 MR. BERNET: There is a hearing tomorrow on a
2 motion for a preliminary injunction. It's possible
3 that we may order this and have it done tonight. I
4 don't think as a practical matter that the reading
5 can be finished by 2 o'clock tomorrow. But we've
6 got to give it a shot.

7 If we get it done tonight, the court reporter
8 will contact you, and she has your phone number,
9 right?

10 MR. MOENCKMEIER: I don't know, but I'm coming
11 back at 3:30.

12 MR. BERNET: You'll have a card then?

13 You'll have an opportunity to read the
14 deposition at some point and your attorney will
15 explain how that works.

16 (Discussion off the record.)

17 MR. BERNET: We will need this by tonight.

18 (Proceedings concluded at 12:13 p.m.)
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CERTIFICATE OF OATH

STATE OF FLORIDA

COUNTY OF HILLSBOROUGH

I, the undersigned authority, certify that JOHN DAVID KUNZ personally appeared before me and was duly sworn.

WITNESS my hand and seal June 21, 2016.

Denise Smith



DENISE SMITH BYER, RPR, FPR

Notary Public

State of Florida at Large

My Commission No.: 807613

Expires: 11/21/2016

CERTIFICATE OF REPORTER

STATE OF FLORIDA

COUNTY OF HILLSBOROUGH

I, Denise Smith Byer, RPR, certify that I was authorized to and did stenographically report the deposition of JOHN DAVID KUNZ; that a review of the transcript was requested; and that the transcript is a true and complete record of my stenographic notes.

I further certify that I am not a relative, employee, attorney, or counsel of any of the parties, nor am I a relative or employee of any of the parties; attorneys or counsel connected with the action, nor am I financially interested in the action.

DATED this June 21, 2016.



DENISE SMITH BYER, RPR, FPR

1 PLEASE ATTACH TO THE DEPOSITION OF JOHN DAVID KUNZ TAKEN
 2 ON JUNE 21, 2016 IN THE CASE OF FEDERAL TRADE COMMISSION
 3 VERSUS LIFE MANAGEMENT SERVICES OF ORANGE COUNTY.

4 Page Line Correction and Reason Therefor

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18 I have read the foregoing pages, and except for any
 19 corrections or amendments indicated above, I hereby
 20 subscribe to the accuracy of this transcript.

21

22

23

John David Kunz

Date

24

25

Witness to signature

Date

From Article at GetOutOfDebt.org