

**Excerpts From
Brandun Anderson
Deposition Transcript
November 16, 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: BRANDUN L. ANDERSON

DATE: November 16, 2016

TIME: 1:43 p.m. to 5:40 p.m.

PLACE: Akerman LLP
420 South Orange Avenue
12th Floor
Orlando, Florida

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

BEFORE: Nathan F. Perkins, RDR
Notary Public, State of
Florida at Large

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1 BRANDUN L. ANDERSON,
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. Brandun Anderson.

8 Q. How do you spell Brandun?

9 A. B-R-A-N-D-U-N.

10 Q. Okay. Have you ever given a deposition
11 before?

12 A. No.

13 Q. And Anderson is A-N-D-E-R --

14 A. E-R-S-O-N.

15 Q. A-N-D-E-R-S-O-N?

16 A. E-R-S-O-N. Yes.

17 Q. Right. Okay. Since you haven't given a
18 deposition before, let me kind of go over some of the
19 ground rules here. First of all, relax. Nobody is
20 going to bite you today.

21 A. I know.

22 Q. Okay. Second, I'm going to ask questions.

23 You will notice I'm speaking probably a little bit

24 slower than I ordinarily do. This is because we have a

25 court reporter here. The court reporter is taking down

1 everything that we say. I'm going to ask you to speak a
2 little slower than you normally do, because I can tell
3 already you are a fast talker in the sense of your
4 cadence is kind of quick. So I would ask you just to go
5 slow to make sure the court reporter can get everything.

6 Also, make sure that I have finished asking a
7 question before you answer me. Now, in real life when
8 you and I are talking, we don't do that, because you --
9 I don't finish the sentence because you know what's
10 coming, you get into it. And that's the way people
11 talk.

12 A. Okay.

13 Q. For purposes of a deposition, though, we can't
14 do that. We have to let me finish in my slow way the
15 question that I'm asking and then go ahead and answer
16 it.

17 A. Okay.

18 Q. For depositions, "yes" and "no" is the answer
19 that you have to give if the question asks for a "yes"
20 or "no" answer. Head nods, head shakes, "uh-huhs" and
21 "uh-uhs," those don't work very well with court
22 reporters. So we have to answer those in that fashion.
23 Okay?

24 A. (Nodding affirmatively).

25 Q. If you don't understand a question that I am

1 asking because I've tripped over my words or asked
2 something that doesn't seem to make sense, just say so,
3 and I'll try to ask the question in a way that you can
4 understand it.

5 A. Okay.

6 Q. Okay.

7 MS. TALISMAN: Does Mr. Anderson have an
8 attorney there with him, Mark?

9 MR. BERNET: He does.

10 MS. TALISMAN: Thank you.

11 MR. BERNET: Go ahead and make your
12 appearance.

13 MR. AGRANOFF: Michael Agranoff. I'm
14 appearing for this specific deposition. And just
15 for the record, my contact information, it's ([REDACTED])
16 [REDACTED].

17 MR. BERNET: Thank you, Mr. Agranoff.

18 MR. AGRANOFF: You're welcome.

19 BY MR. BERNET:

20 Q. All right. Mr. Anderson, Brandun was
21 B-R-A-N-D-U-N; is that right?

22 A. Yes.

23 Q. A little unusual spelling.

24 A. I know.

25 Q. And Anderson is the normal Anderson?

1 A. Correct.

2 Q. A-n-d-e-r-s-o-n?

3 A. Correct.

4 Q. What is your current home address?

5 A. 2633 Dixie Lane, Kissimmee, Florida.

6 Q. Kissimmee?

7 A. Yeah.

8 Q. What's your zip code?

9 A. 34744.

10 Q. Tell me the cell phone number that you use.

11 A. [REDACTED]

12 Q. [REDACTED]

13 A. [REDACTED]

14 Q. [REDACTED]

15 A. [REDACTED]

16 Q. [REDACTED] Is that the only cell phone that you use?

17 A. Yes, it's the only one I have.

18 Q. Do you have a landline?

19 A. No.

20 Q. Nobody under -- I have a landline, but I'm not

21 under. So how long have you lived at your present

22 address?

23 A. Since '05, '06, when I moved here.

24 Q. Where did you move here from?

25 A. Port Charlotte.

1 Q. I see. Where do you work now?

2 A. Higher Goals Marketing.

3 Q. Higher Goals Marketing?

4 A. Yes, sir.

5 Q. I'm going to ask you, if you could, just slow
6 down just a little bit when you talk.

7 A. Sorry.

8 Q. You will relax as we get going. You will find
9 out it isn't so bad. But for now, I'm just going to
10 remind you every now and then. Did you graduate from
11 high school?

12 A. (Shaking head negatively).

13 Q. Did not graduate from high school?

14 A. No, sir.

15 Q. How long did you live in Port Charlotte?

16 A. Two years, three years. I don't recall. It
17 was a while ago.

18 Q. Okay. Let me go about this a little bit
19 differently.

20 MR. AGRANOFF: Counsel? Could I request that
21 whoever is on the other end hit their mute button?

22 MR. BERNET: Amy, it has to be you.

23 MS. TALISMAN: You hear my clicking on the
24 board, on my keyboard?

25 MR. BERNET: Yeah. Can you hit the mute,

1 A. Of course. I repair cars, stuff like that.

2 Q. Okay. When did you meet Wayne Norris?

3 A. I've known Wayne Norris since like '07.

4 Q. How did you meet him?

5 A. Cars.

6 Q. Was he a car guy?

7 A. Yes.

8 Q. Did he have a cool car?

9 A. Not -- no, not anymore.

10 Q. What did he have?

11 A. He had a Mustang.

12 Q. An old one?

13 A. A while ago. What's that?

14 Q. An old one?

15 A. No. It's like '03 to '05?

16 Q. Oh. Just a stock?

17 A. Yeah. It wasn't an old, old, old one, no.

18 Q. It wasn't a '67 candy apple red?

19 A. Unfortunately, no.

20 Q. And you met him in connection with his car?

21 A. I've known him prior to that, but we met going
22 out to car meets and we would go out to the woods and
23 hang out and drink a few and have a fire.

24 Q. Did you have a cool car?

25 A. I did, yes.

1 Q. And some others too? We'll get to that in a
2 minute. Okay. So I've got to ask, what kinds of bad
3 things? What was he saying?

4 A. Just heard he treated Wayne like crap, held
5 money over his head.

6 Q. So Kevin would owe him money but wouldn't pay
7 him unless he would do certain things?

8 A. I don't recall the certain things.

9 Q. Well, what did he say? Tell me what he said.

10 A. Just said, you know, like if you don't like it
11 I can find somebody better. Things such of that nature.
12 I don't remember the exact words.

13 Q. Was it to the effect that Wayne had to do
14 things that Wayne didn't really want to do that Kevin
15 kind of made him by holding money over his head? Was it
16 kind of like that?

17 A. I don't recall. I try not to get too much
18 tied up into that.

19 Q. What did -- what was the nature of what he
20 did? Do you know?

21 A. No, sir.

22 Q. Never told you?

23 A. No.

24 Q. When was the last time you talked to Wayne?

25 A. Last week.

1

[REDACTED]

2

[REDACTED]

3

[REDACTED]

4

[REDACTED]

5

[REDACTED]

6

[REDACTED]

7

[REDACTED]

8

[REDACTED]

9

[REDACTED]

10

[REDACTED]

11

[REDACTED]

12

Q. All right. So in June or so you decide to

13

open this new company, you were telling me. [REDACTED]

14

[REDACTED]

15

A. Yes.

16

Q. -- going to get a grown-up job, if you will.

17

A. Try to do something to better myself.

18

Q. There you go. So what did you think about

19

doing?

20

A. I didn't really -- I mean, I've heard that,

21

you know, the LI business and telemarketing stuff was

22

decent money, So I figured I would take a shot in the

23

dark at it and try it.

24

Q. You didn't have any background in it all --

25

A. No.

1 Q. -- did you, before that?

2 A. No, sir.

3 Q. And your wife didn't either?

4 A. No.

5 Q. But Wayne did?

6 A. Yes.

7 Q. So is that who you talked to about it?

8 A. Yes.

9 Q. And did he help you figure out how to get the
10 thing started up and what licenses you needed and all
11 that?

12 A. Yes. He gave me ideas, yes.

13 Q. Did he actually help with you it?

14 A. Yes. He helped me start. He put me in touch
15 with the -- with people that I didn't know that he
16 obviously did and just made it a little bit easier for
17 me, you know.

18 Q. Who owns Higher Goals Marketing?

19 A. Me.

20 Q. Just you?

21 A. Just me.

22 Q. Does Higher Goals Marketing, do you pay
23 consulting fees like to Wayne or anyone else?

24 A. No.

25 Q. He gets no money at all?

1 A. Yes.

2 Q. Okay.

3 A. I approached Wayne about the idea of maybe,
4 you know, what I could get into, and, you know, he
5 basically guided me to the right people, and like I
6 said, the people that know and stuff such as that
7 matter.

8 Q. Which people?

9 A. Like as far as marketing people and salesmen,
10 you know, sales people and frontiers.

11 Q. Was Mohammed Ula one of them?

12 A. I don't know who that is.

13 Q. Moe?

14 A. I -- don't know who that is.

15 Q. Don't know?

16 A. No.

17 Q. Total Security Vision. Have you ever heard of
18 that company?

19 A. No, sir.

20 Q. Okay. So he put you in touch with some
21 marketing people. With whom specifically?

22 A. Shaw. We saw call him Shaw. His name is
23 Dorian Mohammed I believe.

24 Q. Dorian Mohammed?

25 A. Yes.

1 Q. Did he have a company?

2 A. Yes.

3 Q. What's the name of his company?

4 A. I don't recall. It's --

5 Q. Does he have -- is his number in your phone?

6 A. No. Actually it's not.

7 Q. Okay. How would you get ahold of him if you
8 needed to call him right now or get ahold of him?

9 A. My sales manager has his number.

10 Q. Who is your sales manager?

11 A. Travis.

12 Q. Travis. Okay. That's for marketing. What
13 about regulatory?

14 A. As far as?

15 Q. Well, did you look into what you have to do
16 with the state of Florida --

17 A. Of course.

18 Q. -- if you wanted to run a telemarketing
19 business?

20 A. Of course.

21 Q. How did you figure that out?

22 A. Went on to Sunbiz, registered everything I had
23 to do.

24 Q. Okay.

25 A. I went through that process, got my bond, got

1 all that stuff.

2 Q. Who helped you put all that together?

3 A. Wayne gave me some pointers.

4 Q. Where did you get \$50,000 to post for that
5 bond?

6 A. I don't recall. I mean, most of it was from
7 my car.

8 Q. You got \$50,000 for your car?

9 A. About 30.

10 Q. Thirty, and you had some parts and other
11 things?

12 A. I had another motor and some stuff to sell.

13 Q. So you got some cash from all of that?

14 A. (Nodding affirmatively).

15 Q. Did you have any cash? Probably not since you
16 were just doing side jobs.

17 A. Not much.

18 Q. Yeah. Wayne didn't loan you any?

19 A. Nope.

20 Q. Did anybody else?

21 A. No, sir.

22 Q. Did anybody buy into the company?

23 A. No, sir.

24 Q. How did you come up with the name Higher Goals
25 Marketing?

1 A. I had higher goals for myself.

2 Q. Good for you.

3 A. It just seemed like it fit.

4 Q. Good for you. That works. That's a good
5 answer. So you formed this company and you decide to do
6 telemarketing. How did you staff your company?

7 A. Wayne pointed me in the direction of people to
8 consider.

9 Q. Like who?

10 A. Travis and Melissa and some of the older, you
11 know, some of the fulfillment team.

12 Q. From the old telemarketing company?

13 A. I'm assuming, yes.

14 Q. Okay. Now, they had just been shut down. Did
15 you know about that?

16 A. (Shaking head negatively). No, sir.

17 Q. You didn't know that they had been sued by the
18 Federal Trade Commission and the Florida Attorney
19 General --

20 A. No, sir.

21 Q. -- for selling the exact same product that you
22 are selling?

23 A. No, sir.

24 Q. When did you find that out?

25 A. When I got the subpoena.

1 Q. Okay. This helps him. If we do it now, then
2 we don't forget.

3 A. No problem.

4 Q. And then it turns into a mess later.

5 Okay. When did your company hire Lea
6 Brownell?

7 A. The first -- I mean, the first week.

8 Q. Did you call her?

9 A. Craigslist. I found her on Craigslist. I
10 posted an ad on Craigslist.

11 Q. You put an ad on Craigslist and she called
12 you?

13 A. Yes, her and Randi.

14 Q. The same with Randi?

15 A. Yes.

16 Q. They called you?

17 A. (Nodding affirmatively).

18 Q. Had Wayne told them to call you? Did Wayne
19 say anything to you about Lea and Randi?

20 A. I talked to them about them. He said they
21 were good people.

22 Q. You were checking them out --

23 A. Of course.

24 Q. -- because you are going to hire them?

25 A. Of course.

1 Q. And this is somebody who knows them, right?

2 A. Uh-huh (Affirmative response).

3 Q. Yes?

4 A. Yes.

5 Q. What did he say?

6 A. He said they were very well experienced in the
7 business and they have done this before and they are
8 probably one of the best in the business.

9 Q. What about Travis?

10 A. Travis is the same way.

11 Q. How did you hire him?

12 A. Wayne referred him to me.

13 Q. Wayne referred him?

14 A. Yeah.

15 Q. And Travis' last name is?

16 A. Teel.

17 Q. T-E?

18 A. T-E-E-L.

19 Q. T-E-E-L?

20 A. Yes.

21 Q. What's his title there?

22 A. Manager.

23 Q. Is he like a floor manager?

24 A. He is the fulfillment side manager.

25 Q. On the fulfillment side?

1 A. Yes.

2 Q. Who are your frontiers at Higher Goals
3 Marketing?

4 A. I have about nine now.

5 Q. Nine frontiers?

6 A. Yeah. We lost a few.

7 Q. Well, still for a new startup, that's quite a
8 few. And who are they?

9 A. We have -- I don't recall their exact names.
10 Debra, Christina, Diana. I'm trying to remember them.
11 Tyissha and Bianca. The other two we just hired and I'm
12 not familiar with the names.

13 Q. Who manages the floor?

14 A. Melissa.

15 Q. Melissa manages the --

16 A. My frontier floor, yes.

17 Q. Your frontiers. And then Lea and Randi my
18 guess is are pretty much on their own?

19 A. Yeah, they are pretty much closers. Lea helps
20 around every once in a while, but for the most part
21 she's a closer.

22 Q. Do they have a manager or do they just report
23 to you?

24 A. They just report to me for the most part.

25 Q. Okay. And Travis is on the fulfillment side?

1 Q. She worked at the old company. Yeah. Not
2 Brittney Kincaid?

3 A. No.

4 Q. Samantha O'Donnell. You mentioned Tanya.
5 Okay.

6 MR. DOAN: Debra Sarter.

7 BY MR. BERNET:

8 Q. Right. Okay. Whether you know, it doesn't
9 really matter. We were just trying to get a sense of
10 where they came from.

11 All right. So you mentioned LI. Tell me what
12 LI is and how it works.

13 A. Lower interest rate --

14 Q. Okay.

15 A. -- on credit card debt.

16 Q. And how do you do that?

17 A. I know the basics is my frontiers get a phone
18 call.

19 Q. Uh-huh (Affirmative response).

20 A. If they qualify, we charge a fee.

21 Q. Uh-huh (Affirmative response).

22 A. That fee can range from 995 to 4,995,
23 depending on how much debt they owe and how much work we
24 have to do.

25 Q. Okay. Let's break down what you just said a

1 little bit. Let me write it down. Okay. The first
2 thing I heard you say was that your frontiers get a call?

3 A. Yes.

4 Q. Okay. How do they get these calls?

5 A. I pay my marketing, Shaw, to send calls out.

6 Q. Dorian Mohammed?

7 A. Yes.

8 Q. You pay him to send out calls?

9 A. Prescreen calls, yes.

10 Q. How does he do that?

11 A. I don't know. I don't recall.

12 Q. How much do you pay him?

13 A. \$2,000 a day.

14 MR. DOAN: Can I ask one question? This is
15 just a clarification about the word you are saying.
16 When you are referring to Mr. Mohammed, you are
17 saying Shaw or --

18 THE WITNESS: I call him Shaw. Everybody
19 calls him Shaw.

20 BY MR. BERNET:

21 Q. S-H-A-W?

22 A. Yes.

23 Q. Okay.

24 A. I guess his real name is Dorian Mohammed with
25 two Hs I believe.

1 MR. DOAN: I just didn't know what --

2 THE WITNESS: You're good. We call him Shaw,
3 but his real name is Dorian Mohammed.

4 MR. DOAN: So it's Shaw, like S-H-A-W not
5 S-H-A-H like the Shah or --

6 THE WITNESS: No, S-H-A-W.

7 BY MR. BERNET:

8 Q. You pay him \$2,000 a day. Do you work seven
9 days a week?

10 A. No, five. Monday through Friday.

11 Q. So \$10,000 a week. How do you pay him?

12 A. We started out paying cash, and now he gets a
13 check.

14 Q. Does he give you an invoice?

15 A. No.

16 Q. Does he have a contract with your company?

17 A. No.

18 Q. How does he place his calls? Do you know?

19 A. No, sir.

20 Q. What does he tell people when he calls them?

21 A. I don't know. I'm not a fronter.

22 Q. No, no, no. You are not the fronter. As I
23 understand, your fronters simply take calls that come in
24 to them.

25 A. They receive calls, yes.

1 Q. So I'm not asking about the fronter. What I
2 am asking about is what I call the dialer.

3 A. Okay.

4 Q. Okay? Your dialer places calls outbound to
5 potential customers, right?

6 A. Correct.

7 Q. Okay. What does he tell them when the
8 potential customer answers the phone?

9 A. I don't know.

10 Q. Is it a recorded message?

11 A. Don't know.

12 Q. Have you ever heard what the dialer tells the
13 potential customers on the outbound call?

14 A. No, sir.

15 Q. Okay. What are the criteria for when the
16 dialer gets a potential -- I'm sorry; I'm bothering
17 you -- the dialer gets a potential customer on the phone
18 and that customer is interested in hearing more about
19 the product, how does that customer then get ahold of
20 your fronter?

21 A. I don't know. My office manager Melissa would
22 have a better idea on how that works.

23 Q. Okay. Is it like they have to push a 1 or a 9
24 or a pound sign?

25 A. I'm not sure.

1 Q. But you just got kind of a handshake deal,
2 \$2,000 a day?

3 A. Yes.

4 Q. Okay. All right. So the fronters get a call
5 is what you've said. What do they do?

6 A. The fronters get the call, they read their
7 script, they read their state-approved script.

8 Q. State-approved script?

9 A. Right.

10 Q. Right.

11 A. They get the credit card information if they
12 qualify. Then after that it goes to either Lea or
13 Randi.

14 Q. All right. So they get this call, it's a
15 customer that says I'm interested in your lower interest
16 rate program, and then they read a script?

17 A. Uh-huh (Affirmative response).

18 Q. Right?

19 A. (Nodding affirmatively).

20 Q. Yes?

21 A. Yes, sorry.

22 Q. Where did that script come from?

23 A. A state-approved script that Melissa made
24 them.

25 Q. Did Melissa help you start this company?

1 A. Yes, somewhat.

2 Q. Did you hire her before you began operating?

3 A. Yes.

4 Q. And did she come up with the scripts that were
5 then sent to the Florida Department of Agriculture and
6 Consumer Services?

7 A. Yes.

8 Q. Does Melissa own part of your company?

9 A. No.

10 Q. How is she paid?

11 A. She is paid off \$500 commission plus one
12 percent of total income for the week.

13 Q. Okay. \$500 commission. You mean --

14 A. Salary, sorry.

15 Q. She gets salary of \$500 a week?

16 A. Yes.

17 Q. Plus one percent?

18 A. Plus one percent of commission.

19 Q. Of gross?

20 A. Yes.

21 Q. So if you do \$20,000 per week, she gets one
22 percent of that?

23 A. Yes.

24 Q. How much do you do a week usually?

25 A. Like deals or --

1 Q. Dollars.

2 A. It varies. Between 50 and 60.

3 Q. Fifty and 60 a week?

4 A. Yeah.

5 Q. So she'll make \$500 to \$600 a week?

6 A. She'll make \$1,000.

7 Q. Plus the \$500?

8 A. Well, yeah. She normally makes between \$1,000
9 and \$1,500 a week.

10 Q. What about Lea and Randi?

11 A. They make 10 percent.

12 Q. Ten percent of their sales?

13 A. Yes. But the deal has to go through,
14 obviously.

15 Q. Okay. So they read a script. Is that call
16 recorded?

17 A. No.

18 Q. And who supervises them? Melissa?

19 A. Yes.

20 Q. Your frontiers?

21 A. Yes.

22 Q. Okay.

23 A. She supervises the frontiers.

24 Q. All right. So they read a script and they
25 look to see if these customers qualify?

1 A. No.

2 Q. Who paid the filing fee?

3 A. I did.

4 Q. How did you do that?

5 A. With some of the money from my -- selling my
6 vehicle.

7 Q. Cash?

8 A. Yes.

9 Q. You paid cash?

10 A. Yes.

11 Q. Okay. Did Melissa Deese help you with this?

12 A. I don't recall.

13 Q. With forming the company is what I am talking
14 about.

15 A. Yes. Some of it.

16 Q. Okay. Now this says that the effective date
17 of the company is June 25th of 2016. The date filed
18 June 28th. I assume that's a Friday-to-Monday thing.
19 Is that the time you decided to form the company?

20 A. Yes.

21 Q. Right then? Okay. And Melissa Deese was
22 helping you to some extent with this at this point in
23 time, right?

24 A. Correct.

25 Q. All right. Was Wayne Norris helping you at

1 all at this point in time?

2 A. No.

3 Q. Had he just simply told you, Talk to Melissa,
4 she's the one who can help you get this done?

5 A. Yes.

6 Q. Yes?

7 A. (Nodding affirmatively).

8 Q. Okay. Who else did you talk to to help you
9 put the company together?

10 A. Lea Brownell.

11 Q. Lea helped you put it together?

12 A. Yes.

13 Q. Okay. What about Travis?

14 A. Yes.

15 Q. He helped you put it together too?

16 A. (Nodding affirmatively).

17 Q. Okay. Was Randi involved at all with helping
18 you put it together?

19 A. No.

20 Q. She came later?

21 A. Yeah.

22 Q. Did Lea start working for you before Randi?

23 A. Yes.

24 Q. Okay. And Randi, again, is with an "I,"
25 correct?

1 Q. With?

2 A. Yosi, my landlord.

3 Q. How did you know to call Yosi your landlord?

4 A. Craigslist.

5 Q. Just Craigslist?

6 A. Yeah, searched on Craigslist for a place.

7 Q. Okay. What were you looking for specifically?

8 A. Office space.

9 Q. That was set up for telemarketing?

10 A. No.

11 Q. You didn't need that?

12 A. (Shaking head negatively).

13 Q. How much space were you looking for?

14 A. Didn't have a set preference.

15 Q. Did you have a business plan that you put
16 together to help you put this company together?

17 A. Go ahead. Say that again?

18 Q. A business plan. Did you put together a
19 business plan? Do you know what a business plan is?

20 A. Yes, I do.

21 Q. Okay. Did you put one together?

22 A. Yes, at the time.

23 Q. Okay. Did you put it together in writing?

24 A. No.

25 Q. Okay. Just kind of in your head, you had an

1 idea? What was your idea of how this company would be
2 set up, what it would do?

3 A. I would hire certain people to do certain
4 things for me.

5 Q. Give me a little more specifics than that.
6 You'd hire which people to do what things?

7 A. Well, I'd hire a manager, hire my floor
8 managers.

9 Q. Okay.

10 A. Hire my --

11 Q. But you knew nothing about floor managers or
12 telemarketing up to this point in time other than what
13 Melissa and Wayne had told you, though, right?

14 A. Yes.

15 Q. Correct? Am I correct?

16 A. Correct.

17 Q. Because you had no experience at all?

18 A. No.

19 Q. Okay. So Melissa and Wayne said you need
20 this, and that was basically the business plan. Would
21 you agree with me? What Melissa and Wayne told you?

22 A. No.

23 Q. No? You came up with this yourself?

24 A. Some of it.

25 Q. Okay. But they are the ones with all the

1 background in the industry?

2 A. Yes.

3 Q. Is it fair to say they are the ones who helped
4 you the most to --

5 A. Yes.

6 Q. -- develop this businessman?

7 A. Yes.

8 Q. Okay. What's your rent with your landlord?

9 A. \$2,500 a month.

10 Q. What's the actual name of your landlord?

11 A. Yosi. I have a lease. I have to look. I
12 don't remember the last name.

13 Q. Is it just an individual or did he have a
14 company?

15 A. [REDACTED].

16 Q. [REDACTED] is the name of the landlord?

17 A. Yes.

18 Q. So you pay \$2,500 a month?

19 A. Uh-huh (Affirmative response).

20 Q. Yes?

21 A. Yes.

22 Q. And was there any security deposit that you
23 put down?

24 A. First and last month.

25 Q. So you put down \$5,000?

1 A. Yes.

2 Q. So who did you rely more to help you get this
3 thing going, since you did have all those personal
4 things going on? Melissa? Wayne? Travis?

5 A. Melissa and Travis.

6 Q. Okay. When you pay your rent, how do you pay
7 it?

8 A. Wire.

9 Q. Wire the money over?

10 A. Uh-huh (Affirmative response).

11 Q. Yes?

12 A. Yes.

13 Q. You've given me now some bank statements from
14 Bank of America.

15 A. Yes, sir.

16 Q. These have got account numbers on them, so
17 we're going to redact these. I'm afraid we may have to
18 do it on a lot of pages.

19 MR. DOAN: Yes.

20 BY MR. BERNET:

21 Q. So we'll deal with that in due course. Well,
22 you weren't here for the earlier prior to this. We will
23 make sure that we take out all personally identifiable
24 information or all sensitive information that's
25 contained in these documents, which would include any

1 Q. Is it a telephone service?

2 A. I think so. I just don't remember.

3 Q. Craigslist is right below that.

4 A. Yep.

5 Q. What was that for?

6 A. Hiring.

7 Q. Predictive Concept, underneath that. What was
8 that for?

9 A. I don't recall.

10 Q. We've got two entries for USPS, P.O. boxes.

11 A. Yep.

12 Q. Why are there two entries for P.O. boxes?

13 A. I have two P.O. boxes.

14 Q. Why do you have two P.O. boxes?

15 A. I don't recall.

16 Q. Is that what Melissa told you to do?

17 A. No. Nobody told me to do that.

18 Q. Tell me why --

19 MR. AGRANOFF: He has to answer.

20 BY MR. BERNET:

21 Q. I haven't asked it yet. Let me get it out
22 before you do that.

23 You have no recollection as to why you needed
24 two post office boxes?

25 A. I don't remember. I don't recall.

1 which is for August.

2 MR. AGRANOFF: Just to keep things moving,
3 when he was going months, he's always going to be
4 going --

5 MR. BERNET: It's up the way you --

6 MR. AGRANOFF: Start the way you are.

7 THE WITNESS: I was in there.

8 BY MR. BERNET:

9 Q. Yeah. Maybe your attorney can help you find
10 it. All right. So we're on the front page of the
11 statement that says your business advantage checking for
12 August 1, 2016, to August 31, 2016.

13 MR. AGRANOFF: Are you okay with me helping
14 him?

15 MR. BERNET: I appreciate your help. Thank
16 you very much.

17 THE WITNESS: Me too.

18 BY MR. BERNET:

19 Q. So it says you had deposits during the month
20 of August of \$96,855.12? You withdrew \$37,967.88 --
21 we'll get to this in a minute -- but in cash and that
22 you wrote checks of \$58,074.02. Okay. Does that sound
23 about right?

24 A. Correct.

25 Q. Okay. So let's go to the third page, which

1 says "deposits and other credits." This, it looks like
2 it lists all the money you put into the account --

3 A. Correct.

4 Q. -- during the month. One thing that just
5 jumps out at me is everything is a round number. It's
6 \$3,180 is the first deposit, but then there is a \$3,000
7 deposit, a \$3,000 deposit, an \$800 counter credit, an
8 \$8,000 wire transfer in, \$5,200, and then on it goes.
9 How is it that everything is just in a round number like
10 that? Do you know?

11 A. Nope.

12 Q. What was the source of all this money?

13 A. I don't recall.

14 Q. Well, we've got three, it just says deposits
15 at different branches, two at Golden Rod, one at Union
16 Park. That's about \$9,000. Then we have it says "wire
17 in" on 8/10 of \$8,000, originator, Sunshine Freedom
18 Services. What is Sunshine Freedom Services?

19 A. I plead the Fifth.

20 Q. I'm very surprised to hear that. Tell me
21 what -- first of all, if we're going to do that, let's
22 start with figuring out what we mean by the Fifth.

23 MR. AGRANOFF: Well --

24 MR. BERNET: I could can be kind of cute --

25 He has to do it. He has to assert his

1 leave it to your attorney, the explanation of all of
2 that.

3 We have an \$8,000 wire in from Sunshine
4 Freedom Services on August 10th of 2016, and you are
5 going to plead the Fifth and not tell me where that came
6 from.

7 On August 12th, there's a \$7,800 wire transfer
8 in to Higher Goals Marketing's bank account from
9 Sunshine Freedom Services as the originator. Where did
10 that money come from and for what purpose?

11 A. I don't recall the purpose.

12 Q. Well, what is Sunshine Freedom Services?

13 MR. AGRANOFF: This has been asked and
14 answered, and he's taken the Fifth.

15 MR. BERNET: This is a whole new time entry.

16 MR. AGRANOFF: He's taken the Fifth on the
17 question, "What is Sunshine Freedom Services."

18 MR. BERNET: It's different time entries, so
19 we're going to have to go through each and every
20 one of them. There's no such thing as a blanket
21 assertion on the Fifth Amendment, as you well know,
22 counsel.

23 MR. AGRANOFF: Asked and answered on the exact
24 same "What is that company."

25 BY MR. BERNET:

1 Q. 8/16 of '16, we have a \$7,600 wire transfer
2 into the account of Higher Goals Marketing LLC from, it
3 says, Sunshine Freedom Services. What was that about?

4 A. I don't recall.

5 Q. Did you borrow money from a company called
6 Sunshine Freedom Services?

7 A. No.

8 Q. Was this a capital contribution by Sunshine
9 Freedom Services into Higher Goals Marketing?

10 A. I don't recall.

11 Q. Did you ever pay it back to Sunshine Freedom
12 Services?

13 A. No.

14 Q. Who owns Sunshine Freedom Services?

15 A. I plead the Fifth.

16 MR. BERNET: Counsel, help me out with that
17 one.

18 MR. AGRANOFF: No. All I can say is if you
19 give me a few minutes to confer with my client, I
20 could verify --

21 MR. BERNET: Why don't you do that. Why don't
22 you do that. That's a good idea.

23 MR. DOAN: We're going to take a few minute
24 break, Amy, and David, if you are there.

25 (A recess at 3:36 p.m.)

1 (Proceedings resumed at 3:46 p.m.)

2 MR. BERNET: Okay. Amy, we're back.

3 MS. TALISMAN: All right.

4 BY MR. BERNET:

5 Q. You ready? All right. So the question on the
6 table is who owns Sunshine Freedom Services?

7 A. Gerald Starr.

8 Q. Jerry Starr?

9 A. Yes.

10 Q. Okay. How do you know Mr. Star?

11 A. Friends.

12 Q. Which friends?

13 A. I met him over at Wayne's.

14 Q. Is he a friend of Wayne's?

15 A. Uh-huh (Affirmative response).

16 Q. Yes?

17 A. Yes. Sorry.

18 Q. Same instructions as before. When did you
19 meet him first?

20 A. About a year ago.

21 Q. So tell me why Sunshine Financial Services is
22 sending -- tell me why Sunshine Freedom Services is
23 sending all this money to Higher Goals Marketing.

24 A. I had some fraudulent charges on my card on my
25 bank account from my employees.

1 Q. Higher Goals Marketing?

2 A. Yes, yes.

3 Q. Somebody used the --

4 A. One of my employees got the numbers off the
5 checks and used them to pay their bills and other stuff.

6 Q. Which employee was that?

7 A. Don't know. Never found out.

8 Q. It wouldn't be that hard. If they paid their
9 personal bills, you can trace where the money went and
10 the company would trace it back to a personal account
11 number.

12 A. They wouldn't tell me.

13 Q. Really?

14 A. Absolutely.

15 Q. Bank of America wouldn't help you?

16 A. It wasn't Bank of America. It was the other
17 place.

18 Q. What other place?

19 A. A couple cable companies or something, if I
20 recall correctly.

21 Q. Okay. So tell me then why you came up with
22 this arrangement with Sunshine Freedom Services.

23 A. I figured it would be easier to have money
24 coming in one and going out the other.

25 Q. Do you own any interest in Sunshine Freedom

1 Services?

2 A. No.

3 Q. All right. So customers would send money to
4 your P.O. boxes, the P.O. boxes of Higher Goals
5 Marketing, right?

6 A. In beginning.

7 Q. In the beginning. Well, let's stick with that
8 for now. And it would go to Higher Goals Marketing to
9 the P.O. boxes, and you would go pick up the mail,
10 because you were the only one who picked up the mail,
11 right?

12 A. Yes.

13 Q. And what would you do with those checks?

14 A. Take them to my fulfillment team, and they
15 would verify and make sure the customer is happy. If
16 everything was good, we would deposit them.

17 Q. Deposit them into what?

18 A. SFS, Sunshine Freedom Services.

19 Q. An account for Sunshine Freedom Services?

20 A. Yeah.

21 Q. And where was that account?

22 A. We have them at Chase and Bank of America.

23 Q. Did you open those accounts?

24 A. No.

25 Q. They were already open?

1 A. Correct.

2 Q. So then what was the arrangement? How did
3 that work?

4 A. Bless you.

5 Q. Bless you.

6 A. The arrangement was basically I had money
7 coming into, you know, his -- my client's were told on
8 the phone it was HGM, is who the company they were
9 dealing with, but the billing was taken care of by SFS,
10 so they would send payment to SFS.

11 Q. So the money would come in and the check was
12 made payable to SFS, at least at first before we got to
13 a different model?

14 A. Yes.

15 Q. You'd go deposit the money into an account
16 owned by SFS at what bank? Bank of America?

17 A. Yes.

18 Q. What else?

19 A. Chase.

20 Q. Chase. You said that already. So then how
21 would the money -- what was the arrangement for the
22 money to come over to Higher Goals Marketing?

23 A. He would wire me money two to three times a
24 week.

25 Q. How much?

1 A. I don't recall.

2 Q. Was there an arrangement?

3 A. As far as?

4 Q. Well, you paid him something for doing this?

5 A. Yes. He kept some money.

6 Q. How much?

7 A. I don't recall --

8 Q. Ten percent?

9 A. -- exactly. Between two and six.

10 Q. Two and six percent?

11 A. Yeah.

12 Q. Would he spend the money as you instructed?

13 A. Correct.

14 Q. Or was it just a regular schedule?

15 A. Correct, correct. He would send me money as I
16 instructed.

17 Q. Okay. Where are those P.O. boxes? Where are
18 the addresses?

19 A. One is on -- I'm trying to think of the exact
20 addresses. I don't know the exact numbers off the top
21 of my head. I know the last four. I have one at the
22 UPS Store.

23 Q. 10151 University Boulevard?

24 A. Yeah. Yes.

25 Q. Suite 307, Orlando, Florida, 32817?

1 A. Correct.

2 Q. And the other one, P.O. Box 677460? Does that
3 sound right? In Orlando?

4 A. 09? Is the last number?

5 Q. I've got 60. Is there another one 09?

6 A. No, it might be. I don't recall off the top
7 of my head.

8 Q. Okay. Where is it physically located?

9 A. One is in the UPS Store off University. The
10 other one is 436, and -- I'm trying to think of the name
11 of that crossroad.

12 Q. I may have misread this before. P.O. Box
13 677099?

14 A. Yeah. That's why I asked if there was a nine.

15 Q. I just read it wrong. Orlando, 32867, is what
16 I have got.

17 A. Correct.

18 Q. So you go down, you get the checks, you take
19 them back, you confirm that the customer is happy, you
20 deposit the checks into an SFS account?

21 A. Correct.

22 Q. Then the money piles up in an SFS's accounts.
23 And then you call Jerry --

24 A. Uh-huh (Affirmative response).

25 Q. -- and ask him to send money over to HGM,

1 right?

2 A. Correct.

3 Q. Okay. So that's the way it worked?

4 A. Correct.

5 Q. This was done so that your employees could not
6 take money out of the account to pay their personal
7 bills?

8 A. Correct.

9 Q. See, I'm not following how that works, because
10 there's still going to be money in HGM's Bank of America
11 account. You know, whether it came from the customer or
12 whether it came from SFS really doesn't matter, there's
13 still money in there; employees could still do that. So
14 I'm not following that.

15 A. I don't recall the exact reason.

16 Q. Well, whose idea was this to do this?

17 A. Me and Jerry's.

18 Q. Jerry's?

19 A. Yeah.

20 Q. So did Jerry really help you more set this up
21 than Wayne?

22 A. No. We just -- no.

23 Q. It was more Wayne and Melissa as far as the
24 nuts and bolts?

25 A. I mean, it was more Jerry when it comes to

1 this.

2 Q. To the money?

3 A. Yes.

4 Q. To moving the money around?

5 A. Yes.

6 Q. Okay. Do you have an accountant for the
7 company?

8 A. No.

9 Q. Who pays the bills for the company?

10 A. Travis does payroll.

11 Q. Does he have signing authority on checks?

12 A. Yes.

13 Q. Do you withhold taxes from your employees'
14 paychecks?

15 A. No.

16 Q. Do you have an attorney, the company?

17 A. No.

18 Q. Have you talked to an accountant or a tax
19 attorney about your decision not to withhold?

20 A. Not yet.

21 Q. Okay. Well, I would strongly recommend you do
22 so.

23 A. I will.

24 Q. All right. So that explains these Sunshine
25 Freedom Services wires coming in.

1 A. Yes.

2 Q. Now, at some point you say you switched away
3 from this model. You didn't take checks? Did you take
4 credit card payments from a merchant processing account?

5 A. No.

6 Q. Are you still taking checks from customers?

7 A. Yes.

8 Q. So the methodology that you just described, or
9 the system you just described, that's how you are still
10 doing things, correct?

11 A. Correct.

12 Q. So you get the checks, you confirm that
13 customers are happy, you deposit the checks into an SFS
14 account, you ask SFS to transfer money to you
15 periodically?

16 A. Correct.

17 Q. And you are still doing it that way?

18 A. Correct.

19 Q. All right. Let's go to, let's see, from the
20 page you were on, 1, 2, 3, go down one more page. It
21 starts with "withdrawals and other debits."

22 A. Yes.

23 Q. Okay? On August 9th, the company, somebody
24 withdrew \$200. Okay. The next day somebody -- well,
25 the 16th, somebody withdrew \$7,000. On the 19th

1 what that was? This was on 8/18.

2 A. I don't recall.

3 Q. You've got a cash withdrawal on August 23rd of
4 \$700. Again, this was on the card, 0471. Do you
5 remember what that one was about?

6 A. I don't recall.

7 Q. It looks like a bunch of FedEx charges. \$380
8 on August 29th. Do you recall what that one was about?

9 A. I don't recall.

10 Q. Did you use the card for like personal things,
11 for things like personal groceries?

12 A. Yes.

13 Q. Restaurants, things like that?

14 A. Yes.

15 Q. We have got two \$600 cash withdrawals on
16 August 26, August 29, on card 7637. Do you recall what
17 those were for?

18 A. I don't recall at the time.

19 Q. Did you pay cash to any of your creditors, any
20 of the companies' creditors other than Shaw who you paid
21 cash to for a while you said?

22 A. I don't recall.

23 Q. The landlord?

24 A. Maybe.

25 Q. Don't know, though?

1 A. Just to pay -- when I say marketing, Shaw.

2 Q. To pay him?

3 A. Yes.

4 Q. Okay. So he's your dialer, so you're just
5 paying him?

6 A. Pretty much.

7 Q. Okay. So 2,000 bucks a day. Then you've got
8 another cash withdrawal September 30th, \$5,100. Do you
9 know what that was about?

10 A. Car parts I believe for myself.

11 Q. Good for you. Who was authorized to actually
12 withdraw cash from these company accounts?

13 A. Whoever really needed it at the time.

14 Q. Well, did you allow people to go and withdraw
15 large amounts of cash? I'd consider this large. Or did
16 you do that yourself?

17 A. Yes.

18 Q. Who would you have do it?

19 A. I don't recall.

20 Q. Well, I would assume it would be one of your
21 managers, whether it's Melissa or Lea or Randi or
22 Travis.

23 A. Yeah. They have before.

24 Q. Are there other people too?

25 A. No.

1 leave it there.

2 BY MR. BERNET:

3 Q. Cooper's Hawk Orlando 2. What is that?

4 A. It's a wine place I have gone to a couple of
5 times. It's like a couple bottles of wine every once in
6 a while.

7 Q. You've three in a row there for about 150
8 bucks or so thereabouts. I see lots of cash
9 withdrawals. September 19th, \$1,400 in two separate
10 transactions. On the 26th you have got another 700. On
11 the 27th another 700, the 29th and the 30th, you have
12 got another 1,400 between them. I know I asked you in a
13 general sense, but what are you doing with all of this
14 cash?

15 A. A lot of it I spend.

16 Q. How much cash do you have on you right now?
17 Not that I want it. I'm just curious, how much money
18 you walk around with?

19 A. Not much.

20 Q. So you spend it quick when you get it?

21 A. Yes, unfortunately.

22 Q. On what? Car parts or what?

23 A. Car parts, track stuff. I bet on some races.

24 Q. What are you working on for cars right now?

25 What have you got?

1 A. Right now I'm building a car.

2 Q. What are you building?

3 A. A Talon.

4 Q. Good for you.

5 A. Trying to.

6 Q. How far along are you?

7 A. Almost. Not close enough. I still have a
8 little ways to go. But --

9 Q. All right.

10 A. It's the little stuff that kills you.

11 Q. All right. So now we're on to October. Since
12 this is a little more recent, maybe your memory will
13 feel a little bit better.

14 MR. AGRANOFF: Wrong direction.

15 THE WITNESS: Are you on the first page of
16 October, sir?

17 BY MR. BERNET:

18 Q. Yes. Let's start there with the summary page
19 on the front. It says page 1 of 10 on the bottom.

20 A. I see that.

21 Q. All right. So we've got deposits of \$143,294;
22 withdrawals, \$61,887.28; checks, \$88,670.25.

23 Okay. So now let's go to page 3 of 10.

24 A. Gotcha.

25 Q. Deposits and other credits. And unless I'm

1 misreading it, every single deposit or other credit is a
2 wire transfer in from Sunshine Freedom Services.

3 A. Correct.

4 Q. And they are all nice round numbers with the
5 exception of the second one, which is \$5,894.

6 A. Correct.

7 Q. So the same system for the month of October,
8 right?

9 A. Correct.

10 Q. You would deposit the money into an account
11 owned by SFS, and then SFS would send it to you by wire
12 as requested?

13 A. Correct.

14 Q. Keeping six to ten percent?

15 A. Two to six percent. It varies.

16 Q. Two to six percent. How does it vary? Is
17 there a formula or what?

18 A. It just varies on what I -- what we do a week
19 or a month or whatever.

20 Q. Is there a contract that you have with SFS?

21 A. No.

22 Q. All right. So now we're on page 4 of 10. It
23 looks like a bunch of cash withdrawals under
24 "withdrawals and other debits." It looks like a lot.
25 9,400, 18,400, 18,900, 24,900, 34,900, over \$45,000 in

1 cash from withdrawals from the account in October. And
2 tell me what that was about, why you needed so much
3 cash.

4 A. I don't recall of it.

5 Q. Do you recall any of it?

6 A. Some I spent on racing and some my --

7 Q. Personal use?

8 A. Yes.

9 Q. Okay. All right. But there's also like
10 personal charges on the account on card number 0471.
11 For example, on October 4th you've got a charge for CVS
12 Pharmacy.

13 A. Yes.

14 Q. So that's a personal charge. On October 3rd
15 you've got a charge for Outback --

16 A. Yep.

17 Q. -- \$132. So that's probably a personal
18 charge.

19 A. Correct.

20 Q. All right. Now, there's, in addition to -- I
21 guess it's about \$53,000 -- somebody added it up --
22 \$53,000 or whatever it was that I had said before. But
23 there's also additional cash withdrawals now from the
24 individual cards, it looks like from ATMs. October 7th,
25 for example, \$700. That seems to be a common number.

1 MR. AGRANOFF: Now is the part where if you
2 want to get a quick can of soda --

3 MR. BERNET: If you need a break, that's fine.

4 THE WITNESS: Can I go to the restroom?

5 MR. BERNET: Of course.

6 (A discussion off the record.)

7 (A recess was taken at 4:20 p.m.)

8 (Proceedings resumed at 4:27 p.m.)

9 BY MR. BERNET:

10 Q. All right. So we're back on the record.

11 Now, if you would, Mr. Anderson, flip past the
12 account estimates. The next document in order is
13 something called -- actually now you are going the other
14 way. Now you are going the other way.

15 A. You told me one way and then --

16 Q. The next document in order that you produced
17 to me is titled "Closer Script."

18 A. Yes.

19 Q. Find it for me, if you would.

20 A. I'm getting there. Yes.

21 Q. Okay. So this is a two-page document that's
22 stapled, I think. Is it that way?

23 A. I stapled it, yes. It might be that way.

24 Q. All right. Tell me what that document is.

25 A. It's a closer script that the closer reads to

1 the client.

2 Q. Okay. Where did this document come from?

3 A. I don't recall.

4 Q. Did you write this?

5 A. No.

6 Q. Do you know who did?

7 A. Melissa would probably have a better answer.

8 Q. Okay. The second line down says, "My name is
9 blank with Higher Goals Marketing. We are the leading
10 company in interest rate reduction."

11 But your company had just started, right?

12 A. Correct.

13 Q. All right. It says that the client -- in the
14 next line down it says, "Now, Mrs./Mr. Blank, we show
15 that your account is not passed due --" P-A-S-S-E-D "--
16 due or maxed out, which means that you are eligible for
17 a reduced rate on this account and any other interest
18 bearing account with --" all caps "-- absolutely no
19 out-of-pocket expense."

20 That's what it says. But I thought you said
21 that you charged a fee of \$995 to \$4,995, right?

22 A. Correct.

23 Q. And then you have to have the customer go out
24 and actually get a check and send it to you after you
25 say you have gotten them some sort of satisfaction,

1 right?

2 A. Correct.

3 Q. Okay. So there is some out-of-pocket expense.
4 They've got to pay you \$995 at least, right?

5 A. Correct.

6 Q. All right. Go on to the next one. It says,
7 "You indicated that you owe approximately dollar sign
8 blank. Is that correct? Do you have any other debt
9 that you would like us to help you with today, such as a
10 mortgage? And how much do you owe? Based on what you
11 owe, we're able to save you a guaranteed minimum of
12 \$2,500 in interest and finance charges."

13 Okay? This has me a little confused because
14 this sentence starts with not knowing how much they owe,
15 because it says "you indicated that you owe
16 approximately dollar sign blank, is that correct?" And
17 then yet even in your script, without knowing how much
18 is owed, you are guaranteeing them a minimum of \$2,500.
19 Tell me how that works?

20 A. That probably would be better answered by
21 Melissa.

22 Q. So you don't know?

23 A. No, I don't.

24 Q. Did you read this? Have you read this?

25 A. Yes.

1 Q. You read it through?

2 A. Before, yes.

3 Q. Did you ever ask Melissa to explain what some
4 of these things mean?

5 A. I do. It was a while ago.

6 Q. Part way down, about halfway, it says, "If you
7 have any questions, please don't hesitate to call me,
8 our CS # --" that's a number sign "-- is 866-692-0598."

9 What number was that?

10 A. I believe that was the office number.

11 Q. Is it still?

12 A. I believe so.

13 Q. What is "our CS"? What does that mean? "Our
14 CS number is"?

15 A. I don't recall.

16 Q. Okay. Further down in the script you repeat
17 that, you say that to the consumers that there is no
18 out-of-pocket expense at all.

19 So this is the script you are using right now
20 for the closers, right?

21 A. Yes, this is what they're using.

22 Q. This is what Randi and Lea are using, correct?

23 A. Correct.

24 Q. Do they use this? Do they read it or are they
25 just so familiar with it they don't even need to read

1 it, they just know it? Don't know?

2 A. No.

3 MR. AGRANOFF: No, you don't know?

4 THE WITNESS: I don't know.

5 BY MR. BERNET:

6 Q. You don't know. Okay. All right. So the
7 next document in line, just go up two pages. All right.
8 This is a document, it looks like a script, but it
9 doesn't have a title on it.

10 A. Yeah.

11 Q. What is that?

12 A. It was -- this is the fronters script, I
13 believe.

14 Q. All right. Will you do me a favor? On that
15 document on the bottom, take my pen --

16 A. Right.

17 Q. -- and write "fronter's script" right there in
18 the bottom on the big white space. Okay?

19 A. I have handwriting of a two-year-old.

20 Q. That's fine. Mine is not even. All right.
21 Okay. Where did this script come from?

22 A. Melissa.

23 Q. Did she bring this to you as of about June
24 25th when you formed the company?

25 A. I don't recall exactly.

1 Q. Well, on July the 8th, I think you were
2 operating. Didn't we decide that? Waited a little bit
3 after the 4th?

4 A. Yeah, around then.

5 Q. Around then? Okay. So you would have had
6 this fronter's script by then, right?

7 A. Yes. Her and Lea worked on this.

8 Q. Her and Lea worked on this?

9 A. Correct.

10 Q. Did you pay them before you actually started
11 operating in order get this up and running?

12 A. I lent them a little bit of money, but other
13 than that, no.

14 Q. You loaned them? Didn't pay them?

15 A. I gave them some money out of my pocket.

16 Q. Well, did they expect it back or --

17 A. That I don't know.

18 Q. -- did they pay it back?

19 A. No.

20 Q. So basically you paid them?

21 A. It was basically paid, yes, correct.

22 Q. Okay. So this is the fronter's script that
23 they're using right now, right?

24 A. Correct.

25 Q. Okay. All right. And go to the second page

1 of that document. Just go up one page.

2 A. All right.

3 Q. What are the -- what are "rebuttals"?

4 A. "Rebuttals" is what's used to a customer's
5 question.

6 Q. Okay. So like common questions?

7 A. Correct.

8 Q. And answers to what are common questions?

9 A. Correct.

10 Q. Did you write this, these rebuttals?

11 A. No.

12 Q. Who did?

13 A. Back to Melissa.

14 Q. Did you submit these scripts to the Florida
15 Department of Agriculture and Consumer Services?

16 A. Yes.

17 Q. You personally did it?

18 A. Yes.

19 Q. Okay. When did you do that?

20 A. I don't recall. I had a lot of stuff going on
21 then, unfortunately.

22 Q. One of the rebuttals here, the question is,
23 "What about credit consolidation/credit counseling." Do
24 you see that one?

25 A. Yes.

1 Q. A few down?

2 A. Yes.

3 Q. And the rebuttal is, "Those services may
4 potentially damage your credit rating, which I'm sure
5 you have worked really hard to establish."

6 What's the effect of your LI program on a
7 customer's credit rating?

8 A. I don't know. That question would probably be
9 better answered by Melissa.

10 Q. The question is, "How much is this going to
11 cost?"

12 It says, "Our program is designed to save you
13 at least \$2,500 in interest and finance charges while
14 assisting you in your quest for financial stability. In
15 order to enroll in this program, you must first pay the
16 \$995 enrollment fee."

17 Sometimes it wasn't \$995, right?

18 A. Correct.

19 Q. Sometimes it was more. In fact, it was more
20 whenever you could get more, really?

21 A. Correct.

22 Q. Yeah. So \$995 was really the lowest you would
23 take, right?

24 A. Correct.

25 Q. So go up to the next document. It says

1 "Higher Goals Marketing Verification Script."

2 A. Yes.

3 Q. Where did this particular document come from?

4 A. The same. Melissa. Lea, Melissa.

5 Q. Tell me what the purpose of this is.

6 A. This is to aware the customer of what will
7 happen and what's going to happen, give them a second
8 voice, a better idea what's going on past the fronter.

9 Q. Okay. It's just providing more information
10 and better information from somebody who is a grade
11 above --

12 A. A little bit higher than the fronter.

13 Q. -- than the fronter?

14 A. Correct.

15 Q. Okay. So just making sure the customer
16 understands what's going on?

17 A. Correct.

18 Q. That's what this is about?

19 A. Correct.

20 Q. All right. The next document, this is just
21 your tax ID and certificate of liability insurance?

22 A. Yes.

23 Q. Okay. Those are fine. Let's not get into
24 those. And then you've got a series of spreadsheets?

25 A. My payroll.

1 June 25th, effective -- or I'm sorry, June 28th,
2 effective June 25th, 2016, right?

3 A. Correct.

4 Q. You opened the account at Bank of America on
5 July 8th, 2016?

6 A. Sounds about right.

7 Q. Okay. You didn't open it on June 8th, right?
8 Because the company didn't exist.

9 A. No. Again, I don't recall. I had a lot of
10 stuff going on at the time.

11 Q. Okay.

12 A. I apologize.

13 Q. That's okay. Now, Higher Goals Marketing has
14 had more than one bank account, correct?

15 A. Right.

16 Q. You brought documents today for an account at
17 Bank of America?

18 A. Correct.

19 Q. You've also had an account at BB&T, right?

20 A. Correct. I don't even use that, though. I
21 haven't used that in I don't know how long.

22 Q. Let's keep going through the chronology. You
23 applied for a license with the Florida Department of
24 Agriculture and Consumer Services, a telemarketing
25 license, on August 16th, 2016, right?

1 A. Correct.

2 Q. Okay. And then you received the license on
3 August 31st, 2016; is that right?

4 A. Correct.

5 Q. So why was the first wire transfer from
6 Sunshine Freedom Services to Higher Goals Marketing on
7 August 10th, 2016?

8 A. I don't recall.

9 Q. Sunshine Freedom Services is the entity that
10 bills consumers or to which consumers make out their
11 payments, right?

12 A. They take care of my billing, yes.

13 Q. Okay. So were consumers paying Sunshine
14 Freedom Services on or before August 10th, 2016?

15 MR. AGRANOFF: I advise you to take the Fifth.

16 THE WITNESS: I plead the Fifth.

17 MR. BERNET: It will be a serious legal issue
18 at this point, but fine, we'll sort that out in due
19 course.

20 BY MR. DOAN:

21 Q. Now, when you filled out your application with
22 the Florida Department of Agriculture and Consumer
23 Services, one of the questions you were asked was where
24 you have bank accounts, right?

25 A. Correct.

1 Q. You don't want to --

2 A. I don't want to know anything about him, no.

3 Q. Why not?

4 A. I just don't want to. Obviously, he's into
5 something I don't want to be in.

6 Q. When did you get that impression?

7 A. As soon as I got that subpoena.

8 Q. Okay. But you talked with Wayne -- or I'm
9 sorry. You talked with Lea and Randi way before you got
10 the subpoena, right?

11 A. Well, of course.

12 Q. Okay. So why did you not want to know about
13 Kevin at that point when you were talking with them
14 about him?

15 A. I don't recall. I just -- not something I
16 looked into.

17 Q. Aside from Melissa Deese, Travis Teel and
18 Dorian Mohammed, who else did Wayne Norris put you in
19 touch with in terms of starting this business?

20 A. The installers that came in to do the phones
21 and stuff like that.

22 Q. Who were they?

23 A. I believe the guy's name was Tom. I don't
24 recall -- I don't remember their names.

25 Q. Do you remember what Tom's company was called?

1 A. No, I don't. It was a while ago. I don't
2 recall.

3 Q. Did you say Melissa and Wayne both helped you
4 with the Sunbiz filing?

5 A. I don't recall. I mean yes and no. Some
6 things I asked Melissa questions about and stuff like
7 that, but --

8 Q. What about Wayne?

9 A. Not really, no.

10 Q. How much money have you paid Wayne Norris from
11 Higher Goals Marketing?

12 A. None.

13 Q. Are you sure about that?

14 A. Positive.

15 Q. If I told you that I have a payroll check made
16 out to him --

17 A. Oh, yes, \$500.

18 Q. What was that for?

19 A. That was for money that I owed him a long time
20 ago. Now that I am able to pay him, I could.

21 Q. So if it said "payroll" in the memo line,
22 would that be incorrect?

23 A. Probably, yes.

24 Q. Okay. You were repaying a personal loan?

25 A. Personal loan before my stuff -- before this

1 even came about.

2 Q. Why did you owe him \$500?

3 A. Car parts.

4 Q. And you said Lea and Melissa both helped file
5 materials with the Florida Department of Agriculture.

6 A. Yes.

7 Q. Do you remember who was responsible for
8 helping you with which parts?

9 A. No, I don't recall.

10 Q. How many days last week were you at Higher
11 Goals Marketing?

12 A. Last week? Was last week a holiday? I can't
13 remember.

14 Q. Veterans Day was on Friday.

15 A. I did not go in Friday.

16 Q. Did you go in Monday?

17 A. Yes. Every other day I went in for a few
18 minutes, you know, when I could. I go in there, do the
19 mail and then go home. Friday I did not go in.

20 Q. Was the business open on Friday?

21 A. Yes, yes.

22 Q. Okay. Is that typical for you to go in just
23 for a few minutes a day most days?

24 A. No. Most days I'm there pretty much all day.

25 Q. Okay. And what do you do while you are there?

1 A. Maybe not even an hour. I mean, she was
2 referred to me by Wayne, so I took it upon myself to
3 trust that.

4 Q. Was she referred to you or did she answer a
5 blind Craigslist ad?

6 A. A little bit of both. I called Wayne and
7 asked him about her.

8 Q. After she responded to the ad or before?

9 A. Yes, after.

10 Q. What do your Craigslist ads say?

11 A. Melissa handles most of them for the most
12 part.

13 Q. And do the people contact Melissa?

14 A. Yes. She handles all the hiring as far as the
15 fronter side.

16 Q. What telephone numbers do the ads say to call?

17 A. That I don't recall.

18 Q. Is it your number?

19 A. No, it's not my number. I -- I don't know
20 what number she uses.

21 Q. Okay. It's totally up to her?

22 A. She would have a better idea than I would.

23 Q. Who handles consumer complaints about the
24 company?

25 A. I do for the most part.

1 Q. Who besides you has online access to Higher
2 Goals Marketing's bank accounts?

3 A. Travis, Melissa, my managers, those managers
4 and me.

5 Q. Okay. Anybody else?

6 A. No.

7 Q. Does Higher Goals Marketing have accounts at
8 banks other than Bank of America and BB&T?

9 A. No.

10 Q. Has it at any point?

11 A. No.

12 Q. Have you applied for accounts at any other
13 banks?

14 A. No, sir. Those are the only two that I have.

15 Q. Okay. How about SFS? You said it banks at
16 JPMorgan Chase and at Bank of America?

17 A. Yes.

18 Q. Anywhere else?

19 A. I believe maybe TD. I don't recall.

20 Q. Who are the signers on Sunshine Freedom
21 Services' bank accounts?

22 A. Gerald Starr.

23 Q. And who else?

24 A. That's it.

25 Q. And you are the only signer on the Higher

1 Goals Marketing accounts?

2 A. Yes.

3 Q. But you said that Travis can cut checks?

4 A. Yes. He can handle my payroll.

5 Q. Okay. He signs your name?

6 A. No, I sign my name, print it out on the check.

7 My signature is printed.

8 Q. So it's already stamped on the check?

9 A. Yes, yes.

10 Q. Your signature is stamped on the check.

11 Travis fills in the amount and the payee?

12 A. And the person, yes.

13 Q. Okay. The person meaning the person receiving
14 the money?

15 A. Yeah, whether it be fronter or whatever.

16 Q. Okay. And so you never actually see the
17 paychecks? He just completely handles that?

18 A. For the most part.

19 Q. Okay. What's Cards Qualification Program?

20 A. I don't recall.

21 Q. If I told you that a consumer had filed a
22 complaint with the Better Business Bureau about SFS and
23 said that the first name Samantha -- and that's Samantha
24 O'Donnell, one of your employees -- gave the consumer
25 was Cards Qualification Program, 10151 University

1 A. -- to take care of such things.

2 Q. So Travis Teel is the one in charge of the
3 method of rendering the fee from the consumer to SFS?

4 A. He is the manager.

5 Q. Have you ever provided him any instructions on
6 how consumers should get their money to you?

7 A. No.

8 Q. Okay. So if your understanding is correct,
9 that the consumer is sending Higher Goals Marketing
10 through SFS \$995 to \$4,995 from pre-existing funds in
11 their personal checking account, how is that not an
12 out-of-pocket fee?

13 A. You'd have to ask Travis about that. I -- I
14 don't -- I mean.

15 Q. Would you agree with me that, as you sit here
16 today, that sounds an awful lot like an out-of-pocket
17 fee?

18 A. Yes.

19 Q. Okay.

20 MS. TALISMAN: I'm sorry. Like a what?

21 MR. DOAN: Like an out-of-pocket fee.

22 MS. TALISMAN: Thank you.

23 MR. DOAN: You're welcome.

24 BY MR. DOAN:

25 Q. Does SFS pay any expenses of your business?

1 A. No.

2 Q. They simply collect money and then send it to
3 Higher Goals Marketing?

4 A. Correct.

5 Q. Does Jerry Starr take his two to six percent
6 from the money that comes into SFS, or do you pay it to
7 him separately from HGM?

8 A. I'll tell him what to take at that time, that
9 week. It varies.

10 Q. Okay. So if he takes in \$5,000 in about --
11 let's say he takes in \$5,000 in a week and he gets six
12 percent, you'll say, "Jerry, you get to keep \$300, so
13 you need to wire me \$4,700"?

14 A. No. I'll let him know what I need for payroll
15 and all that stuff, and he'll wire me that. And if
16 there's a little bit, you know, that he's able to grab,
17 he'll grab some.

18 Q. Okay. So you said for payroll. But SFS
19 doesn't just wire HGM money for payroll, does it?

20 A. Payroll, my rent. I mean --

21 Q. So all expenses in Higher Goals Marketing?

22 A. Yes.

23 Q. Okay. Does anybody other than Jerry Starr get
24 a cut of the money from SFS?

25 A. No.

1 MR. BERNET: How much do you make? Are you on
2 a set salary?

3 THE WITNESS: I take a lot more than I should,
4 I guess.

5 MR. BERNET: All those cash withdrawals?

6 THE WITNESS: Yes.

7 MR. BERNET: Okay. Sorry to interrupt you.

8 MR. DOAN: No, that's okay.

9 BY MR. DOAN:

10 Q. You also get paychecks too, right?

11 A. Yes.

12 Q. And you style them as payroll checks?

13 A. Correct.

14 Q. Are the telemarketers and other people who
15 work at Higher Goals Marketing employees or independent
16 contractors, in your view?

17 A. I don't recall.

18 MR. AGRANOFF: Objection. Calls for legal
19 speculation.

20 BY MR. DOAN:

21 Q. Do you intend to issue them 1099s or W-2s at
22 the end of the year?

23 A. I don't recall. I'll have to get with
24 somebody to get about that.

25 MR. BERNET: Sooner rather than later.

1 BY MR. DOAN:

2 Q. Did Wayne Norris ever recommend an attorney to
3 you to help out in starting your business?

4 A. No.

5 Q. Did Wayne ever recommend an accountant to you?

6 A. No. That's why everything is messed up.

7 Q. Is there some reason that Travis Teel can't
8 obtain a telemarketing license?

9 A. I don't know.

10 Q. I mean, have you ever thought about just
11 applying for one for him in case he does need to speak
12 with a consumer?

13 A. No.

14 Q. And it's never been brought to your attention
15 that there might be a reason why he can't obtain a
16 telemarketing license?

17 A. No.

18 Q. Did you ever let Wayne Norris use any of those
19 ATM cards that you showed Mr. Bernet?

20 A. I believe he has in the past for funds I owed
21 him before.

22 Q. So this is separate from the \$500?

23 A. Yes.

24 Q. So how much other money has Wayne Norris
25 gotten from Higher Goals Marketing?

1 A. I don't recall the exact amount. I've owed
2 him money from a while ago before this, like I said.

3 Q. Give me a ballpark of how much he's got in
4 addition to the \$500 check.

5 A. Nine thousand, 8-, 9,000.

6 MR. BERNET: Since July?

7 THE WITNESS: Since I've known him.

8 MR. BERNET: Okay. How much since July?

9 MR. DOAN: From Higher Goals Marketing.

10 MR. BERNET: From these companies.

11 THE WITNESS: I don't recall the exact number.

12 BY MR. DOAN:

13 Q. Just give me a ballpark. More than \$5,000?

14 A. Yes or no, maybe. I mean, it might be. I
15 don't recall.

16 MR. BERNET: That was good. That was good.

17 MR. DOAN: That covers your bases, I'll give
18 you that.

19 MR. AGRANOFF: I'll object. He said he does
20 not recall.

21 THE WITNESS: I don't recall.

22 BY MR. DOAN:

23 Q. I just asked you for a ballpark, and you don't
24 even remember a ballpark. What documents do you have
25 that would shed some light on how much in cash

1 withdrawals Mr. Norris has been allowed to make from
2 Higher Goals Marketing?

3 A. I wouldn't have any.

4 Q. I mean, could you point out on the bank
5 statement that you went through with Mr. Bernet before,
6 which ones were Wayne and which ones weren't?

7 A. Probably not, no.

8 Q. And you just give Wayne the card and let him
9 go take the cash out?

10 A. Yes, when I can't be there, yes.

11 Q. How often do you see Wayne?

12 A. It depends on what I have got going on in my
13 personal life.

14 Q. Does he come by the office?

15 A. No.

16 Q. What is he doing for a living right now?

17 A. To my understanding, he does concrete work, I
18 believe. I think that's it.

19 Q. Have you ever given any money directly or
20 indirectly to Kevin Guice?

21 A. No.

22 Q. Have you ever given any money directly or
23 indirectly to Harry Wahl?

24 A. No.

25 Q. Have you ever given any money directly or

1 Q. You have all three Bank of America debit cards
2 in your wallet today. When was the last time somebody
3 other than you had one of those cards?

4 A. I don't recall.

5 Q. This week?

6 A. Maybe last week.

7 Q. Who was that?

8 A. Maybe Melissa or --

9 Q. How much money has Lea Brownell taken out in
10 cash using the Higher Goals Marketing ATM cards?

11 A. None.

12 Q. So she can pay bills with it, with the cards
13 as well?

14 A. Yes, but she does not.

15 Q. Oh, she doesn't?

16 A. No, she doesn't.

17 Q. I thought you named her before as somebody who
18 would be allowed to use --

19 A. She would be allowed, but she does not.

20 Q. Okay. How much closing does Lea Brownell do
21 for Higher Goals Marketing?

22 A. It varies.

23 Q. Give me a ballpark. How many closes does she
24 do a week versus how many closes Randi does a week?

25 A. I think they are both about even. I think

1 they are in rotation. That's the way Melissa has it set
2 up.

3 Q. How long has it been that way?

4 A. Since the beginning I believe.

5 Q. Okay. And Melissa supervises Lea and Randi?

6 A. Yeah. She's on that, on their side of the
7 floor, Melissa's side of the floor.

8 Q. Okay. So Melissa supervises the fronters, Lea
9 and Randi, and then Travis supervises the fulfillment
10 people?

11 A. Correct.

12 Q. What does Adrien Brezinski do for Higher Goals
13 Marketing?

14 A. Just an assistant.

15 Q. She's like an office manager type person?

16 A. Yes.

17 Q. You mentioned gambling a few times when you
18 were talking with Mr. Bernet about cash.

19 MR. AGRANOFF: I advise my client to take the
20 Fifth on anything related to illegal gambling.

21 BY MR. DOAN:

22 Q. Okay. Putting aside any illegal gambling that
23 may or may not have occurred, what type of gambling do
24 you do? Legal gambling.

25 A. Plead the Fifth.

1 A. No.

2 Q. Now you mentioned earlier when Mr. Bernet was
3 asking you that there was a \$700 limit per card on your
4 ATM withdrawals. Is there any limit on the amount of
5 counter withdrawals that you are allowed to do at Bank
6 of America?

7 A. I don't recall.

8 Q. Okay. For example, I see on October 12th,
9 2016, there's a Bank of America withdrawal for \$9,000,
10 and then on October 13th, there is -- it says a teller
11 cash withdrawal from the same account for \$6,500. This
12 is in -- what have you marked this? As Exhibit?

13 MR. BERNET: 5.

14 BY MR. DOAN:

15 Q. It's 5 on page 4 of 10 of the October 2016
16 statement. Do you see what I was referring to, Mr.
17 Anderson?

18 A. What's the exact date?

19 Q. I'm sorry. It's on page 4 of 10.

20 MR. BERNET: On the October statement.

21 THE WITNESS: I gotcha. I was one page.

22 BY MR. DOAN:

23 Q. Okay. So on October 12th there is a \$9,000
24 cash withdrawal. On October 13th there is a \$6,500 cash
25 withdrawal. Is that because of any limit that Bank of

1 America imposes on the amount of cash you are allowed to
2 take out from your account in a day?

3 A. It might have been. I don't recall.

4 Q. Were both of those withdrawals yours?

5 A. Yes.

6 Q. You took them both?

7 A. Yes.

8 Q. And then you see -- I mean, we have a similar
9 pattern here on October 19th, you take out \$5,000, and
10 on October 21st, two days later, you take out \$7,600.
11 Why is that?

12 A. I don't recall specifically.

13 Q. Who decides how much cash you are going to
14 take out of the Higher Goals Marketing accounts?

15 A. Me.

16 MR. AGRANOFF: Can we go off record for a
17 moment?

18 MR. DOAN: Sure.

19 (A discussion off the record.)

20 MR. DOAN: All right. So we are back on the
21 record. I think we have an agreement with
22 Mr. Agranoff that I am going to yield the floor now
23 to Ms. Beamer, with the understanding that I am
24 going to have an opportunity to look at my notes.
25 If I have some more questions, I'll come back after

1 BY MS. BEAMER:

2 Q. So you say that Higher Goals handles it with
3 the banks. What do you mean by that?

4 A. The fulfillment team gets on the phone with
5 the banks, discusses with them and the client, and they
6 do what they need to do.

7 Q. Do you have any more details?

8 A. No. Travis would probably be better to answer
9 stuff such as that.

10 Q. Who monitors the telemarketers?

11 A. As far as?

12 Q. I'll rephrase. Who monitors what they say on
13 the telephone?

14 A. Melissa.

15 Q. And you said Travis Teel does not get on the
16 phones?

17 A. No, he does not get on the phones.

18 Q. Okay. So in some of the spreadsheets that you
19 provided, he gets a commission. Can you explain that?

20 A. I'm kind of grateful. He gets a commission
21 on, you know, what we make that week.

22 Q. Okay. So when you say, when you reference
23 commission on spreadsheets, it's not commissions of the
24 sales, commission of all the sales coming in?

25 A. Correct.

1 customer was happy. I believe they even wrote a review
2 on there for us. They were refunded the money and, you
3 know, the tie is broken.

4 Q. And then I did a quick calculation of the cash
5 withdrawals in the month of October, and it looks like
6 it's about \$53,000. What percentage of that would you
7 say is for your own benefit?

8 A. I don't recall.

9 Q. Is it more than half of that?

10 A. Probably.

11 Q. Is it to 50 to 75 percent of that?

12 A. Yes.

13 Q. So there's a second spreadsheet with time
14 stamps on it.

15 A. Yes.

16 Q. Who makes those notes?

17 A. Travis did.

18 Q. And some of those notes reference "she hit
19 tier 2."

20 A. Yes.

21 Q. What is the tier system?

22 A. Zero -- zero to five deals a week for the
23 fronter is nine bucks an hour, and then I believe it's
24 12 to 15 is 10. You know, it's kind of like a bonus.
25 The harder they work, the more money they get, they can

1 customer was happy. I believe they even wrote a review
2 on there for us. They were refunded the money and, you
3 know, the tie is broken.

4 Q. And then I did a quick calculation of the cash
5 withdrawals in the month of October, and it looks like
6 it's about \$53,000. What percentage of that would you
7 say is for your own benefit?

8 A. I don't recall.

9 Q. Is it more than half of that?

10 A. Probably.

11 Q. Is it to 50 to 75 percent of that?

12 A. Yes.

13 Q. So there's a second spreadsheet with time
14 stamps on it.

15 A. Yes.

16 Q. Who makes those notes?

17 A. Travis did.

18 Q. And some of those notes reference "she hit
19 tier 2."

20 A. Yes.

21 Q. What is the tier system?

22 A. Zero -- zero to five deals a week for the
23 fronter is nine bucks an hour, and then I believe it's
24 12 to 15 is 10. You know, it's kind of like a bonus.
25 The harder they work, the more money they get, they can

1 at the termination of this hearing.

2 MR. BERNET: Okay. So you are done now.

3 MR. AGRANOFF: I'm done when we walk out of
4 this --

5 MR. BERNET: Right now.

6 MR. AGRANOFF: I'm done after consulting with
7 him following this.

8 MR. BERNET: Okay.

9 MR. AGRANOFF: My termination, at the end of
10 today my services are terminated.

11 MR. BERNET: You --

12 MR. AGRANOFF: That's a poor wording.

13 MR. BERNET: I get it.

14 MR. AGRANOFF: Basically I'm going to talk
15 with my client when we leave here. Beyond that, I
16 am not retained to further represent him absent
17 notice to parties otherwise.

18 MR. BERNET: Think about whether you want to
19 extend his employment.

20 THE WITNESS: Yes, sir.

21 MR. BERNET: You guys talk about the specifics
22 of all that.

23 (Deposition Concluded at 5:40 p.m.)

24

25

CERTIFICATE OF OATH

STATE OF FLORIDA
COUNTY OF HILLSBOROUGH

I, the undersigned authority, certify that
Brandun L. Anderson, personally appeared before me and
was duly sworn.

WITNESS my hand and official seal this 25th day
of November, 2016.

Nathan F. Perkins, RDR
Notary Public - State of Florida
My Commission Expires: 7/18/2017
Commission No. FF011877

1 REPORTER'S CERTIFICATE

2
3 STATE OF FLORIDA

4 COUNTY OF HILLSBOROUGH

5
6 I, Nathan F. Perkins, Registered Diplomate
7 Reporter, certify that I was authorized to and did
8 stenographically report the deposition of Brandun L.
9 Anderson; that a review of the transcript was requested;
10 and that the transcript is a true and complete record of
11 my stenographic notes.

12
13 I further certify that I am not a relative,
14 employee, attorney, or counsel of any of the parties, nor
15 am I a relative or employee of any of the parties'
16 attorney or counsel connected with the action, nor am I
17 financially interested in the action.

18
19 Dated this 25th day of November, 2016.
20
21
22

23 _____
24 Nathan F. Perkins, RDR
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WITNESS' SIGNATURE PAGE

PLEASE ATTACH TO THE DEPOSITION OF BRANDUN L. ANDERSON,
TAKEN ON NOVEMBER 16, 2016, IN THE CASE OF FEDERAL TRADE
COMMISSION, ET AL, VS. LIFE MANAGEMENT SERVICES OF ORANGE
COUNTY, LLC, ET AL.

PAGE LINE CORRECTION AND REASON THEREFOR

From Article at GetOutOfDebt.org

I HAVE READ THE FOREGOING PAGES AND, EXCEPT FOR ANY
CORRECTIONS OR AMENDMENTS INDICATED ABOVE, I HEREBY
SUBSCRIBE TO THE ACCURACY OF THIS TRANSCRIPT.

BRANDUN L. ANDERSON

DATE

WITNESS TO SIGNATURE

DATE