

1 A Payroll.

2 Q Anything else?

3 A I may have done some of the accounts receivables.
4 I can't remember at the time. Because throughout my job at
5 DLB, I have done work at home and in the office, just as Pat
6 does.

7 Q When you worked at home, were you ever consulted
8 about matters pertaining to DLB's business?

9 A If it was accounting.

10 Q Okay. For example, if they wanted to buy
11 something, and they wanted to know how much money was
12 available for a purchase, they might have given you a call?

13 A No. They would have had that information.

14 Q Okay. What types of things would you have been
15 consulted about, then?

16 A Mostly only payroll. If it was a payroll issue,
17 if they were going to fire someone or hire someone, it would
18 have been a payroll issue. I would have dealt with that.

19 Any other questions, they would have had the main
20 work at DLB, so they really wouldn't have had to have asked
21 me.

22 Q Who was doing the remaining accounting functions
23 for DLB when you were off on this leave of absence?

24 A Carolyn. As far as accounts receivable.
25 Payables, Patricia would have handled.

1 Q Was Patricia actually going in to the office
2 during this time period?

3 A I believe so.

4 Q And how long were you on a leave, did you have a
5 leave of absence.

6 A From May of 1996 to August of 1996.

7 Q Are you paid any type of officer fees for your
8 duties performed as an officer of DLB?

9 A No, ma'am.

10 Q No fee, no monies, you are not paid any monies
11 separate from your regular DLB salary for anything that you
12 do as an officer of DLB?

13 A No.

14 Q What exactly are your duties as the Corporate
15 Secretary?

16 A Well, as Corporate Secretary, I am responsible for
17 taking the minutes of the corporate meetings. And minutes
18 of any other meetings, as far as insurance, or there have to
19 be special meetings. I would be responsible for taking the
20 minutes.

21 Q Okay. When was the last time you had a corporate
22 meeting?

23 A Two-thousand, I believe it was July or August.

24 Q Okay, how often do you have those?

25 A Every year.

1 Q Once a year?

2 A Once a year.

3 Q Okay. And when you have a corporate meeting,
4 where do you have it?

5 A It depends. We usually try to incorporate, the
6 one time of the year that we incorporate the four of us
7 getting together. And it may be held at Patricia and Ron's
8 house, it may be held at a different office site location.

9 Q When you say a different office site location, do
10 you go like on a holiday sometimes?

11 A Yes, we do. Yes.

12 Q And you generally have it the same time of the
13 year?

14 A No. We used to, until a few years ago, we always
15 had them in December. And then the last two or three years
16 we've moved them to the summer.

17 Q So if you have it as a holiday, then you could
18 write off all those expenses for taking the holiday and
19 going somewhere. Is that --

20 A That's what we've been told.

21 Q Yes, okay. When you said other meetings or any
22 kind of special meetings, do you have any other kind of
23 meetings that you would take minutes, where you would take
24 minutes?

25 A The only other meeting that we have ever had that

1 had to have minutes was when we changed our 401, when we
2 changed our 401 plans.

3 Q How long did that meeting last?

4 A Very short, very brief. Maybe 10 minutes.

5 Q Even though you do not have formal meetings very
6 often, as you have testified, in fact you talk among
7 yourselves. When I say among yourselves, I am talking about
8 you and David and Patricia and Ronald have traditionally
9 talked among yourselves about the operation of DLB. Isn't
10 that correct?

11 A Not always.

12 Q Not always?

13 A Not always.

14 Q When was that not correct?

15 A Well, I'm not really -- it would be more Pat,
16 Ronald, and David that may talk, not necessarily myself.
17 I'm only the Corporate Secretary, so they only have to
18 include me if they are going to need minutes taken. I'm not
19 someone that makes decisions.

20 Q So when they are having, if there has been prior
21 testimony that you talk back and forth on a regular basis,
22 but it is just informally, that would not be accurate?

23 A Well, no, I am sorry, that would be accurate.
24 Because in the Brasher family, you don't even go to dinner
25 without discussing DLB. I'm sorry, but you don't. So --

1 Q So DLB business is pretty much a constant topic of
2 conversation?

3 A Yes.

4 Q And that would include you and David and Ron and
5 Patricia generally?

6 A It could, yes.

7 Q If you are all four together --

8 A Yes.

9 Q -- you all participate in those discussions?

10 A Yes.

11 Q And do you have input in those discussions?

12 A No. Well, I may talk with them. I don't really
13 think I would have input, no.

14 Q You think they would just discount, disregard
15 anything you say?

16 A I don't know. I don't know. I mean, no, not
17 necessarily. Yes, I would.

18 Q Well, was that a yes or a no?

19 A Yes, I would have input.

20 Q You would have input.

21 A Yes. I'm sorry.

22 JUDGE STEINBERG: And then Ron and Pat leave, and
23 then you really have input.

24 THE WITNESS: Yes.

25 (Laughter.)

1 BY MS. LANCASTER:

2 Q Aside from taking minutes at corporate meetings or
3 any special meetings, what are your responsibilities as an
4 officer of DLB?

5 A As an officer, I can't think of any other
6 responsibilities.

7 Q Do you have any responsibility for the way the
8 corporation is operated?

9 A Responsibility? I'm not sure. I have
10 responsibilities as far as accounting duties are concerned.
11 But as a corporate secretary, I don't think I have any other
12 responsibilities.

13 Q So I am talking about in your capacity as an
14 officer of DLB at this point.

15 A No.

16 Q Not in your capacity as an employee of DLB. I
17 believe your testimony has been that as an employee of DLB,
18 you handle the accounting functions. Is that correct?

19 A Yes.

20 Q But I am asking you separate from that, as an
21 officer of DLB, do you have any responsibility for the way
22 DLB is operated?

23 A No.

24 Q Do you have any responsibility for documents that
25 would be filed in the name of DLB?

1 A Yes. Sometimes -- the name, the assumed name
2 documents?

3 Q Any documents filed on behalf of DLB in an
4 official capacity.

5 A Only tax-type documents that would require my
6 input.

7 Q Okay. So if it is a tax return that is being
8 prepared for DLB, and when you get it, do you get it back to
9 review it before it is actually filed?

10 A Yes.

11 Q And if you see that there is an error in that tax
12 return, would you feel some responsibility to get that error
13 corrected?

14 A I wouldn't presume to, I wouldn't know an error on
15 a tax document if it was a tax filing, especially if it came
16 from my CPA. No. I would look over it. I would make sure
17 that it had the correct names on it, but that would probably
18 be as far as I would be able to take it.

19 Q That would be the extent? You do not, you are not
20 familiar with the gross revenues of DLB?

21 A Only as far as making sure that they are the same
22 that we have on our accounting reports every month. I
23 wouldn't even compare the two, because that's what I would
24 assume my CPA was doing.

25 Q So you would turn over any accounting-type

1 responsibilities on official tax returns, that type of
2 document, to the CPA.

3 A Yes.

4 Q Okay. How about any other type of documents that
5 might be filed with the corporation, with DLB? For example,
6 do you have any responsibility regarding the filing of FCC
7 applications?

8 A No, ma'am.

9 Q Or licenses?

10 A No, ma'am.

11 Q If there has been testimony here that there were
12 some women-owned business documents, some type of special
13 documentation that goes along with having a woman majority
14 owner, are you familiar with those documents?

15 A Yes, ma'am.

16 Q Do you have any responsibilities in maintaining
17 those documents?

18 A Yes, ma'am.

19 Q Do you have any responsibilities as far as
20 submitting those documents to appropriate authorities?

21 A Yes.

22 Q Okay. If, do you actually draft those documents?

23 A They are fill-in-the-blank-type documents. I am
24 responsible for accumulating the documents that go with
25 them. And then all of the reports that they require. They

1 are very extensive. I am responsible for those. And then
2 sending them to the appropriate agency.

3 Q Okay, who fills in the blanks on the main form?

4 A I probably do. I know I do, yes.

5 Q Do you consider that your duty as the Secretary of
6 the corporation? Or is that your duty as the employee of
7 DLB?

8 A That's my duty as Pat's assistant.

9 Q As employee of DLB.

10 A Yes, ma'am.

11 Q You have reviewed the documents that have been
12 filed in connection with this case, have you not?

13 A Only the ones that I was given last week.

14 Q Okay. We are going to go over them more
15 specifically. But generally, as Corporate Secretary of DLB,
16 would you have any, would you feel any responsibility
17 towards reviewing those documents, any documents filed with
18 the FCC, prior to them being filed with the FCC?

19 A Only if they were brought to my attention.

20 Q Okay. Who -- would such documents normally be
21 brought to your attention?

22 A No, ma'am.

23 Q Were any of the documents filed in this case
24 brought to your attention?

25 A No, ma'am.

1 Q What was Patricia's -- strike that.

2 You are aware that David and Ronald and Patricia
3 are all FCC licensees. You are aware of that, aren't you?

4 A Yes.

5 Q When did you first become aware of that?

6 A Somewhere in the course of the conversations from
7 the beginning Net Wave allegations to now.

8 Q Are you aware that FCC licensees have a duty of
9 candor to the FCC?

10 A I don't think I was aware of it before this trial.
11 Or, because I'm not a licensee, I've never seen the forms, I
12 don't think I was aware of that.

13 Q Did you think that licensees are supposed to tell
14 the truth?

15 A If I would have given it any thought, then yes.

16 Q Well, being truthful is important, right?

17 A Yes.

18 Q You teach your children to be truthful, don't you?

19 MR. ROMNEY: Objection, Your Honor. Relevance.

20 JUDGE STEINBERG: I think we can stipulate that
21 being truthful is important. Be it to the FCC, or the IRS,
22 or anybody else.

23 MS. LANCASTER: Well, Your Honor, I believe her
24 testimony was if she had given it any thought. And I just
25 want to clarify that she would normally think that being

1 truthful would be important.

2 JUDGE STEINBERG: Okay.

3 BY MS. LANCASTER:

4 Q What was Patricia's job duties when you joined DLB
5 in 1996? Or not when you joined, excuse me. Strike that.
6 In 1996. What was she doing in that time frame?

7 A When I came to work in 1990 for Patricia?

8 Q No. In 1996.

9 A Oh.

10 JUDGE STEINBERG: Do you want it before or after
11 the leave of absence, or both?

12 BY MS. LANCASTER:

13 Q Both.

14 A Patricia's job in the company has always been
15 running the company. Regardless of where we are in time,
16 she is responsible for everything that we do to run that
17 company, financial-wise.

18 When I left in 1996, she therefore had to resume
19 taking over the payables again. But she was always the, she
20 always has been the type of person that's hands-on. She
21 works in the service department. She -- not works in the
22 service department, she oversees the people. She's very,
23 she's always been very involved.

24 Q Okay. So she has a hand in all the activities of
25 DLB?

1 A She tries.

2 Q Okay. When you said always running the company
3 financial-wise, she did not limit her supervision to just
4 the finances of DLB, did she?

5 A No. There were some areas, when Ron started to
6 work in the company, up until the time that Ron came to work
7 in the company, Pat was responsible for everything. And
8 when Ron came to work in the company, they sort of split up
9 duties. And Pat basically did financials and service. And
10 Ron did sales and, I'm not sure, marketing.

11 Q When did Ron come to work for the company?

12 A Nineteen-eighty-four, I believe. He was there
13 when I came.

14 Q Okay.

15 JUDGE STEINBERG: In this division of duties, who
16 did FCC stuff?

17 THE WITNESS: Ron.

18 JUDGE STEINBERG: Did Pat ever do FCC stuff that
19 you know of?

20 THE WITNESS: Not to my knowledge.

21 BY MS. LANCASTER:

22 Q In November of 2000, when the depositions were
23 being taken, what were Patricia's duties at that time?

24 A Total financial responsibility. And even if other
25 people are doing jobs, everyone still has to ultimately

1 report to her. You know, if there's problems, she's aware
2 of them. She has final decision-making.

3 Q Is she physically doing much of the duties? Was
4 she physically handling many of the tasks that needed to be
5 done in November of 2000?

6 A When necessary.

7 Q What does that mean?

8 A When Carolyn left, Pat was right there. She had
9 to help me do all of the accounting.

10 Q Okay. Prior to Carolyn leaving, how much, how
11 many of the tasks did Patricia actually perform?

12 A I'm not sure. Probably just on an as-needed
13 basis. Whether there be problems in the service department,
14 or accounting problems. As needed.

15 Q Okay. How often was she coming in to the office
16 prior to Carolyn leaving?

17 A I'm not sure the exact number of days.

18 Q Can you approximate it?

19 A Often. Several times a month. You know, at least
20 once a week or more.

21 Q Okay. She would come in at least once a week.

22 A Most likely, yes.

23 Q How often do you go to the office?

24 A Too often. I try to go every day. I try to go
25 every day.

1 Q You miss a day every now and then?

2 A Yes, only when my children need me.

3 Q And was that true back in November of 2000, also?

4 A Yes.

5 Q As far as what are Patricia's duties now? As of
6 today, what are her duties?

7 A She still has ultimate financial responsibility.
8 She still has, it's still her company. She has the final
9 oversee of everything.

10 Q Have her duties changed at all since November of
11 2000?

12 A No, ma'am.

13 Q How about your duties? I believe you stated they
14 have not changed at all?

15 A No.

16 Q Okay.

17 JUDGE STEINBERG: What was her response?

18 MS. LANCASTER: No.

19 JUDGE STEINBERG: It is no, they have not changed
20 at all.

21 MS. LANCASTER: No, they have not changed at all.

22 BY MS. LANCASTER:

23 Q In 1995, what were Ron's duties?

24 A Sales, marketing. And Ron has always been
25 responsible for the FCC licensing. He was at that time

1 responsible for all the sales department. We had a
2 salesman, but he was responsible for all sales and
3 marketing.

4 But then, Ron is always, I mean, even though there
5 was a separation of duties, Ron has always oversaw the, it's
6 still their company, too. He has always oversaw the service
7 department, and, you know. His main duties would have been
8 sales and marketing.

9 Q Between Ron and Pat, who was the ultimate
10 authority in the company?

11 A Patricia.

12 Q Patricia did not defer to Ron?

13 A Well, on some duties she would have.

14 Q Like what?

15 A Sales. She didn't get involved in sales at all.
16 She, to my knowledge, never got involved in the licensing.

17 Q In 1995, how often was, how many hours a week was
18 Ron spending in the office?

19 A Oh, I don't know. Ron comes to work very early.
20 He comes to work at 5 o'clock in the morning, and he may
21 stay until 1 or 2 in the afternoon, or he may stay until 5
22 or 6 o'clock in the afternoon.

23 Q Did he accomplish any work when he came to work at
24 5 in the morning?

25 A I don't know. I wasn't there.

1 (Laughter.)

2 A I don't know.

3 Q What time did you come to work?

4 A Nine.

5 Q Was he actually working when you got to work?

6 A No. Not from my point of view.

7 Q When he would leave at the end of the day, would
8 he go run errands --

9 A Yes.

10 Q -- for DLB?

11 A Yes.

12 Q So can you approximate, how many hours a week do
13 you think he was working back in 1995?

14 A I would say Ron has probably always worked a
15 minimum of 40, I mean 50 hours a week or more.

16 Q Fifty-plus hours.

17 A Exactly.

18 Q Okay. How about in 1996, after he supposedly
19 retired? No, I am sorry, that was 1997, wasn't it?

20 A Yes.

21 Q When did he retire?

22 A Whatever year it was. It was November, '98, I
23 think.

24 Q Okay.

25 A November, '98.

1 Q Well, was he -- let me strike my prior questions,
2 then.

3 Did he maintain this 50-plus hours up until he
4 retired?

5 A He still does.

6 Q Okay, that was going to be my question. Has there
7 been any change in the number of hours he is at the office
8 since he retired?

9 A He's tried to not work as many hours. But Ron
10 loves to work. And he's, lately it's been less and less.

11 Q Now, what does that mean?

12 A Well, whereas in the past Ron has always worked
13 40, 50 hours a week, right now he seems to have fewer and
14 fewer projects so he doesn't have to work as many hours. He
15 may work 10 hours a week right now.

16 Q Does he still come in every day?

17 A No.

18 Q How often does he come in?

19 A Two times a week, three times a week.

20 Q He is there two to three times a week?

21 A Yes.

22 Q Does he still get in at 5 in the morning?

23 A I don't think so. Not as often any more.

24 Q When he is there, does he work the same length of
25 time during the day generally that he used to, just he does

1 not come in as many days? Or have his hours also changed?

2 A His hours have changed. He is not working as many
3 hours.

4 Q What does he do now?

5 A I don't think I ever know what Ron is -- I don't
6 know. I don't know what he does.

7 He has certain duties. He puts the Cokes in the
8 Coke machines. He does some janitorial duties. Creates
9 pay-offs.

10 Q Does he have, does he still have input as far as
11 manage, making management decisions on behalf of DLB?

12 A Yes.

13 Q Would he still have a say whether somebody is
14 hired?

15 A No.

16 Q Would he still have a say whether somebody is
17 fired?

18 A Yes.

19 Q Would he still have a say in whether or not DLB
20 was, say DLB needed financing and needed to apply for a
21 loan, would Ronald have any input in that decision?

22 A No, ma'am.

23 THE REPORTER: I am sorry, I could not quite hear
24 that.

25 THE WITNESS: No.

1 THE REPORTER: Could you please pull your mike a
2 little bit closer? Thank you.

3 BY MS. LANCASTER:

4 Q Who would make that decision now?

5 A What was the question?

6 Q If DLB needed financing and needed to obtain a
7 loan, who would make that decision?

8 A Patricia. David and I would go to Patricia and
9 let her know, and Pat would make the decision.

10 Q So you and David are really not in charge of DLB
11 at this point.

12 A We are in charge of running day to day. David is
13 in charge of running most everything other than accounting
14 and the office personnel.

15 Q And you are in charge of the accounting and the
16 office personnel.

17 A Yes.

18 Q Is that how I understand it?

19 A Yes.

20 Q What is your current salary?

21 A Ninety-two thousand, four hundred.

22 Q And David's?

23 A Ninety-two thousand, four hundred.

24 Q Pat's?

25 A One hundred twenty thousand, something.

1 Q How is that salary determined?

2 A I'm not sure. It's been the same for the last
3 couple of years now. It's been the same since January of
4 2000. It was based on how well we're doing, and mostly our
5 profits. On what we're doing.

6 Q When you say it's based mostly on profits, are the
7 profits just divided among the three of you?

8 A No, ma'am. When I say it's based on profits, that
9 may not be exactly correct. It's based on whether or not
10 we, how much we can afford to pay us. Whether or not we
11 think that the company can actually afford our salaries.
12 They haven't been raised since 2000, or since January of
13 2000. So --

14 Q Neither has mine.

15 (Laughter.)

16 JUDGE STEINBERG: Just the Government is not doing
17 well.

18 MS. LANCASTER: They are just not doing well, I
19 guess.

20 BY MS. LANCASTER:

21 Q Did you get a large salary increase when Ron
22 retired?

23 A No. Every year we increased our salaries. It
24 didn't matter whenever Ron retired or not. We had hoped to
25 increase Pat's when Ron retired. I don't think it happened

1 immediately.

2 Q So it does not matter how many names are in the
3 pot as far as how the salary is divided. In other words, it
4 does not matter if you have got three officers or management
5 people, versus four management people? It has no influence
6 on salaries that are being paid?

7 A No, ma'am.

8 Q Describe for us the type of business of DLB. What
9 does DLB do?

10 A Mobile communications.

11 Q And what does that entail?

12 A Parts, service, and sales of mobile communications
13 and community repeaters and sales and services.

14 Q Sounds like you have said that a few times before.

15 A I think I have filled that out a few times.

16 Q Parts, service, and sales of, say it again?

17 A Mobile communications.

18 Q Okay.

19 A As well as provide community repeater service.

20 Q Do you have a parts department?

21 A Yes, ma'am.

22 Q And in that parts department, do you -- well, I
23 take that back.

24 Is that used in connection with the repair of
25 equipment?

1 A Yes.

2 Q Parts and repair kind of go together?

3 A Yes. Yes. We don't necessarily stock parts just
4 to sell parts. We mostly stock them to repair the radios.

5 Q And you have a sales department?

6 A Yes.

7 Q And what does that do, exactly?

8 A Sells the equipment. They sell the mobile
9 equipment, the radio equipment.

10 Q Okay. Who do they sell to?

11 A The community. Government agencies.

12 Q Are most of DLB's customers commercial customers?

13 A Yes. Or Government.

14 Q You do not have a lot of individuals who come in
15 and want to be put on your system?

16 A No.

17 Q And then you have, I believe you stated you had
18 the repeater service?

19 A Yes, ma'am.

20 Q What percentage of DLB's business comes from
21 repeater billings? Let's say, what percentage of DLB's
22 gross revenues come from repeater billings?

23 A I'm guessing. I would say a fourth.

24 Q Okay. How much from the service parts part of the
25 business?

1 A That would depend on the market. Sometimes our
2 service department has carried us through --

3 Q Why -- I am sorry, go ahead.

4 A But most of the time our service would probably be
5 at least 50 percent of our business, if not more.

6 Q Okay. And the sales department?

7 A We only have one salesperson. Of course, that's
8 David right now. So it's very small right now. It's a very
9 small percentage, maybe 20 percent.

10 Q Okay. Are the functions of the various
11 departments -- when I say department, I am talking about the
12 repeater service, versus the equipment installation and
13 repair service, versus the -- well, maybe I did not, maybe
14 that is not clear.

15 Is there a separate department that would be
16 equipment installation?

17 A No, that would be the service.

18 Q Okay. So the repeater business, the service
19 department, and then the sales department, are they
20 interconnected in any way?

21 A Could you say that again?

22 Q Sure. When I say departments, you have already
23 stated you have a repeater, community repeater business
24 basically is one part of DLB's business.

25 A Okay.

1 Q And then you stated that there is a sales
2 department, where you go out and try to sell equipment or
3 get whatever.

4 A Yes.

5 Q And then there is a repair, service and repair
6 department. Are those three departments interconnected?
7 Does one help the other one? Or do you refer business back
8 and forth? That is just an explanation. Are they
9 interconnected in any way?

10 A Yes. The community, the repeater is not a
11 separate department; it is part of the sales department when
12 it's a sale, it's part of the service when it's a service
13 need.

14 Q Okay, so -- are the community repeater and the
15 repeater parts of the business the same?

16 A As far as I know.

17 Q How many repeaters are in operation in, at the
18 Dallas site?

19 A I don't know.

20 Q How many customers are used at the Dallas, use the
21 Dallas site?

22 A Dallas is our biggest site. I would be guessing.
23 I would say 100.

24 JUDGE STEINBERG: I do not think I want you to
25 guess.

1 THE WITNESS: I do not know.

2 JUDGE STEINBERG: Because guessing does not
3 advance the record at all.

4 THE WITNESS: Okay.

5 JUDGE STEINBERG: And so, if you do not know, I
6 would prefer you answer you do not know. And if Ms.
7 Lancaster wants to put something in front of you, or say
8 something that might refresh your recollection or get you to
9 remember betting, she can do that.

10 THE WITNESS: Okay.

11 BY MS. LANCASTER:

12 Q Would your answer be the same for the Fort Worth
13 site and the Allen site?

14 A Yes.

15 Q Who normally keeps up with who the customers are?

16 A The office personnel.

17 Q Okay. So that would be a function that you would
18 supervise, is that correct?

19 A Yes.

20 Q So you would, you keep the records.

21 A They keep the records up in the front office.

22 Q Okay. You just do not, have not reviewed those
23 records.

24 A No.

25 Q And you do not know, you would have no basis for

1 determining or approximating the number of customers?

2 A No.

3 Q Do you know the geographical area covered by the
4 repeater service?

5 A Yes.

6 Q What is it?

7 A Dallas, Forth Worth/Dallas.

8 Q How many sets of books, financial record -- when I
9 say books, I am talking about the financial records. How
10 many sets of books does DLB keep?

11 A Two. I am sorry. DLB keeps one set of records.

12 JUDGE STEINBERG: When you say two sets of books,
13 I think of Mark Rich.

14 (Laughter.)

15 MS. LANCASTER: Well, I saw Mr. Pedigo going
16 apoplectic over there when I asked that question. And
17 particularly when she said two.

18 MR. PEDIGO: That is unfair, unfair.

19 (Laughter.)

20 JUDGE STEINBERG: One we give to the accountant,
21 and one we slide under the table.

22 I think maybe you better clarify what you mean.

23 BY MS. LANCASTER:

24 Q Do you want to change your answer, Ms. Brasher?

25 A DLB keeps one set of records.

1 Q Okay. Is there another set of records that you
2 are familiar with?

3 A Brasher.

4 Q Okay. So the DLB records are kept separately from
5 the Brasher records?

6 A I try.

7 Q And you are responsible for keeping both sets of
8 records?

9 A As far as the accounting purposes, yes. And
10 reporting to the CPA, yes. I am not responsible for the tax
11 returns on the Brasher account.

12 Q Okay. Explain to me what you mean by two sets of
13 records, and what the difference is between the two.

14 A DLB has an account, and Brasher has a business
15 account.

16 Q Now, when you say business account, you are
17 talking about a banking account?

18 A Yes, ma'am.

19 Q Okay. How many banking accounts does DLB have?
20 One?

21 A DLB has one, yes.

22 Q So if there has been testimony that there are two
23 DLB bank accounts, you are not familiar with those?

24 A I think we have, we only have one checking
25 account, as far as I know.