

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

REPORTER'S RECORD

TRIAL COURT CAUSE NO. 3028

IN THE INTEREST OF	)	IN THE DISTRICT COURT
ARTHUR JESSOP, BETTY JANE	)	
JESSOP, LUANNE JESSOP,	)	
PATRICK MERRIL JESSOP,	)	
MERRIL ANDREW JESSOP,	)	SCHLEICHER COUNTY, TEXAS
MERRILEE JESSOP, MERRIL	)	
HARRISON JESSOP AND BRYSON	)	
MERRIL JESSOP	)	51ST JUDICIAL DISTRICT

-----

Excerpt of Proceedings

Testimony of Fredrick Merril Jessop

-----

On the 28th day of September, 2009, the following  
excerpt of proceedings came on to be heard in the  
above-entitled and numbered cause before the Honorable  
Barbara Lane Walther, Judge Presiding, held in San  
Angelo, Tom Green County, Texas;

Proceedings reported by machine shorthand.

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

A P P E A R A N C E S

FOR THE PETITIONER:

Ms. Natalie E. Malonis  
SB# 12887450  
The Reib Firm  
1173 Bent Oaks, Suite 200  
Denton, Texas 76210  
(940) 591-0600

FOR THE RESPONDENT:

Ms. Amy Hennington  
Hennington, Butler & Jones  
SB# 00790866  
430 W Beauregard Ste B  
San Angelo, TX, 76903  
(325) 659-8929

1 (The following are excerpts of  
2 proceedings and is the testimony  
3 of Fredrick Merril Jessop.)  
4

5 FREDRICK MERRIL JESSOP,  
6 having been first duly sworn, testified as follows:

7 DIRECT EXAMINATION

8 BY MS. MALONIS:

9 Q. Mr. Jessop, how many children do you have with  
10 the petitioner?

11 A. Eight.

12 Q. Can you hear me okay?

13 A. Eight children.

14 Q. Okay. And how long has it been since you and  
15 petitioner and the children all ceased living together  
16 in one house?

17 A. About six years, seven, I don't recall.

18 Q. Was it 2003?

19 A. 2003, I think.

20 Q. Okay. And since 2003, how much child support  
21 have you paid for any or all of your children that are  
22 subject to this suit?

23 A. I don't have that figure.

24 Q. Have you paid any child support?

25 A. A little, yes.

1 Q. Okay. What child support have you paid,  
2 generally?

3 A. Just through the -- the Department of Social  
4 Security, this is where it came from. I didn't pay it.  
5 They paid it.

6 Q. Okay. So they receive benefits from the State?

7 A. Uh-huh.

8 Q. Is that -- okay. And so you have paid no --  
9 you personally have paid no child support?

10 A. Very little.

11 Q. Okay. But you have paid some?

12 A. Yes.

13 Q. Okay. Can you describe that for me?

14 A. Just -- the first time we met after she left, I  
15 gave her title to a car and a little bit of money. I  
16 don't recall how much.

17 Q. Okay. In 2003?

18 A. Probably.

19 Q. Okay. How do you -- what is your income  
20 presently?

21 A. Social Security.

22 Q. And how much is that?

23 A. I think it's around a thousand a month.

24 Q. Okay. And did you -- did you receive through  
25 your attorney a subpoena with a request for documents?

1 MS. HENNINGTON: Your Honor --

2 THE COURT: Ma'am?

3 MS. HENNINGTON: -- there's a motion for  
4 protective order on that subpoena duces tecum, because  
5 Ms. Malonis send it to my office via facsimile about  
6 2:30 on Friday asking for documents that go back for ten  
7 years and documents -- a long list. We filed a  
8 protective order because there was no time to get them.

9 THE COURT: Did you have time to get any?

10 MS. HENNINGTON: I do. I have tax returns  
11 for the last few years, but she's going back to 2000.  
12 She wanted --

13 THE COURT: I understand.

14 MS. HENNINGTON: So that --

15 THE COURT: I understand. Have you  
16 exchanged with her whatever it is that you have?

17 MS. HENNINGTON: I didn't know she was  
18 going to ask for them or not today so....

19 Here are the last two years of tax returns.  
20 Those are the ones we have.

21 Q. (MS. MALONIS) Mr. Jessop, your counsel just  
22 handed me tax returns for 2007 and 2008. Did you  
23 provide these to her?

24 A. Did you?

25 Q. Would you like to see them?

1 A. I don't recall where we got them.

2 Q. Okay. All right. And have you provided any  
3 other documents that -- that are responsive to the  
4 request?

5 A. I gave her what I had, yes.

6 Q. Okay. Aside from what you've reported on  
7 your -- or what you receive in social security,  
8 currently, what other access to resources do you have?

9 A. I have none.

10 Q. All right. How are you paying Ms. Hennington?

11 A. I haven't paid her.

12 MS. HENNINGTON: Objection, Your Honor, we  
13 haven't requested attorneys fees so I think it's  
14 irrelevant how he's paying my bill.

15 THE COURT: Ms. Malonis.

16 MS. MALONIS: Your Honor, whatever he's  
17 paying anybody or that's being paid on behalf -- on his  
18 behalf is evidence and indicative of what resources are  
19 available to him.

20 MS. HENNINGTON: Your Honor, we  
21 respectfully disagree. I think the statute sets out a  
22 laundry list of things that can be used as net  
23 resources, such as scholarships or monthly, you know,  
24 payment of your college kids' dorms and things like that  
25 are set out. And whether or not somebody's paying a

1 legal bill for him, I don't think is envisioned under  
2 the Family Code to consider his net resources.

3 THE COURT: Doesn't it say it's not an  
4 exclusive list?

5 MS. HENNINGTON: It is, Your Honor.

6 MS. MALONIS: Your Honor, the Code  
7 encompasses any and all sources, including gifts.

8 THE COURT: I'll allow the question.

9 Q. (MS. MALONIS) Can you answer the question,  
10 please?

11 A. Say the question.

12 Q. How are you paying Ms. Hennington?

13 A. I haven't.

14 Q. Okay. Do you have a fee agreement with  
15 Ms. Hennington?

16 A. I do not.

17 Q. Is Ms. Hennington working for free?

18 A. So far.

19 MS. HENNINGTON: Your Honor, I would state,  
20 so we're clear, and can speed things along, since it's  
21 almost 4:00, there has not been a fee agreement for this  
22 litigation for this case. And I haven't sent a bill for  
23 anything to Mr. Jessop.

24 THE COURT: In connection with the child  
25 support action?

1 MS. HENNINGTON: For the child support  
2 action.

3 Q. (MS. MALONIS) Are you employing Ms. Hennington  
4 for any other suits or any other lawyers?

5 A. Am I personally?

6 Q. Do you have any other lawyers representing you?

7 A. Yes.

8 Q. Okay. Who -- what lawyers are those and what  
9 matters?

10 THE COURT: The Court can take judicial  
11 notice of some of the matters, those that are pending in  
12 Schleicher County.

13 Q. (MS. MALONIS) Let me ask you, aside from  
14 your -- Mr. -- your criminal attorneys' representation  
15 and your -- in the criminal proceedings in Schleicher  
16 County, Ms. Hennington's representation in this child  
17 support matter, what other attorneys have you -- have  
18 you engaged to represent you in the last year and a half  
19 or has anybody engaged?

20 A. I'm not aware of any.

21 Q. Is Mr. Ken Okazaki representing you in Utah?

22 A. I do not know just what he's doing.

23 Q. Okay. Do you have any -- any attorney-client  
24 relationship with Mr. Ken Okazaki?

25 A. I've talked to him.

1 Q. Okay. Are you aware that he's filed pleadings  
2 on your behalf in Utah?

3 MS. HENNINGTON: Objection, irrelevant.  
4 It -- to the child support case, Your Honor.

5 MS. MALONIS: Your Honor, we're going to  
6 have a difficult time determining what his assets are  
7 and his -- what's being expended on his behalf is about  
8 the best evidence we can come up with that will indicate  
9 what is available for him.

10 He has -- he has employed numerous  
11 attorneys, teams of attorneys on various matters over  
12 the last year and a half. Somebody's paying them.  
13 That's money that could be available to pay child  
14 support over and above the thousand dollars a month that  
15 he's receiving from social security.

16 THE COURT: Ms. Hennington?

17 MS. HENNINGTON: Your Honor, I think  
18 getting into the -- the relationship or attorney-client  
19 relationship with anyone else is irrelevant.

20 THE COURT: Do you have another line of  
21 questioning you would like to ask?

22 Q. (MS. MALONIS) What are your -- what are your  
23 current monthly living expenses?

24 A. I do not know.

25 Q. I'm sorry?

1 A. I don't know.

2 Q. Do you pay any monthly living expenses?

3 A. Not myself, no.

4 Q. Who pays them?

5 A. I don't know that.

6 Q. Where do you live?

7 A. Schleicher County.

8 Q. What -- describe your home for me, please.

9 A. Like a regular house.

10 Q. Okay. What's the -- what size is it? What's  
11 the construction and so forth?

12 A. It's a log house. I do not know the size.

13 Q. How many bedrooms does it have?

14 A. I don't know that.

15 MS. HENNINGTON: Objection, irrelevant,  
16 Your Honor. This is child support. She's -- you know,  
17 she's asking about the size of the house. What does  
18 that have to do with the net resources available to  
19 pay child support?

20 THE COURT: Well, under 140 -- 154.067 when  
21 there's a problem with income, you can go into other  
22 resources, can't you?

23 MS. HENNINGTON: You can, but the size of  
24 someone's house? I -- I'm -- how does the size of  
25 someone's house go into net resources? I don't know

1 that there's a single case out there that would say that  
2 where you live has to go as a resource that you could  
3 sell and provide an asset to be paid for child support.

4 MS. MALONIS: Actually there's several  
5 cases the Court can impute an income to his non-income  
6 producing assets. The Court can consider any benefit  
7 that he has available to him as a resource available,  
8 anything that's paid on his behalf, as -- as his net  
9 available resources.

10 MS. HENNINGTON: I do agree with  
11 Ms. Malonis. We're going into a line of questioning --  
12 I'm like, let's get to the child support. Sorry.

13 THE COURT: Do you remember what the last  
14 question was?

15 THE WITNESS: You have to restate it.

16 Q. (MS. MALONIS) I believe I asked how many  
17 bedrooms in your house.

18 A. It's a multiple house. And I -- I don't have  
19 the number.

20 Q. Do you know how many people live in your house?

21 A. I don't.

22 Q. Is it more than ten?

23 A. I would say yes.

24 Q. Is it more than twenty?

25 A. I don't know.

1 Q. You know how many adults live in your house?

2 A. I don't.

3 Q. Okay. When was the house constructed?

4 A. Four, five years ago.

5 Q. Is that the same house you've lived in  
6 continually or have you moved?

7 A. Moved.

8 Q. Do you remember anything about the house that  
9 you lived in prior to that, the house that you're in  
10 now?

11 A. I don't, other than it's similarly built.

12 Q. Okay. Do you know what the cost of  
13 construction was?

14 A. The what?

15 Q. The cost of construction?

16 A. No, I do not.

17 Q. Do you have electricity in your home?

18 A. There's electricity there, yes.

19 Q. Do you pay a utility bill?

20 A. I do not, no.

21 Q. Does someone pay that on your behalf to provide  
22 all the electricity to your house?

23 A. I -- I don't know.

24 Q. Do you know where the --

25 A. I don't think it's on my behalf, no.

1 Q. But -- okay. Do you know whose name the  
2 utility bill is in?

3 A. I think it's in a company name.

4 Q. Do you know what company?

5 A. I don't.

6 Q. Do you know who owns your house?

7 A. I do not.

8 Q. Is it YFZ Land, LLC?

9 A. I don't think so.

10 Q. Are you familiar with an entity called YFZ  
11 Land, LLC?

12 A. Used to be, yes.

13 Q. Do you have a relationship with that entity or  
14 have you ever?

15 A. Not really. Not really.

16 Q. Are you a manager of that entity?

17 A. I was at one time.

18 Q. Is that entity still in existence?

19 A. I don't think so.

20 Q. Are you a member of that entity or were you?

21 A. I don't know what you mean by member.

22 Q. Were you an owner of that company?

23 A. No.

24 Q. Okay. When you were a manager of that entity,  
25 what did your management duties include?

1 A. I was like a banker.

2 Q. I'm sorry?

3 A. Like a banker.

4 Q. Any other duties?

5 A. No.

6 Q. Were you responsible for making filings with  
7 the Secretary of State for that entity?

8 A. I think I had a part in it at one time.

9 Q. Okay. You know when that entity was formed?

10 A. I don't recall.

11 MS. MALONIS: Your Honor, I would like  
12 to -- to offer a self-authenticating memorandum and  
13 documents from the Office of the Secretary of State.

14 MS. HENNINGTON: Do you have the original?

15 MS. MALONIS: That is the original. It  
16 comes electronically from the Secretary of State.

17 Q. (MS. MALONIS) Mr. Jessop, are you the  
18 registered agent for YFZ Land, LLC?

19 A. I was at one time, yes.

20 Q. Okay. Do you know who the other owners of the  
21 company were?

22 A. I -- I'd have to look at the document.

23 Q. Okay. Do you know what your percentage  
24 ownership was?

25 A. I had no percentage.

1 MS. MALONIS: Do you have any objection?

2 MS. HENNINGTON: No.

3 MS. MALONIS: May I have this marked as 10?

4 (Petitioner's Exhibit Number 10 marked.)

5 MS. MALONIS: And petitioner offers

6 Petitioner's 10.

7 MS. HENNINGTON: No objection, Your Honor.

8 THE COURT: Admitted.

9 MS. MALONIS: And that's my only copy. If  
10 after the Court reviews it, if I could ask the witness  
11 questions.

12 THE COURT: Sure.

13 MS. MALONIS: I'm going to mark

14 Petitioner's 11.

15 (Petitioner's Exhibit Number 11 marked.)

16 MS. MALONIS: And let counsel review.

17 MS. HENNINGTON: Your Honor, the only  
18 objection I'd have to this is it's irrelevant based on  
19 the... (inaudible).

20 MS. MALONIS: It's actually rebuttal when  
21 it goes to respondent's credibility. May -- petitioner  
22 offers Petitioner's Number -- Petitioner's 11.

23 MS. HENNINGTON: May I inquire as to  
24 provide... (inaudible)?

25 MS. MALONIS: Mr. Jessop said that he

1 believed the company was no longer in existence.

2 MS. HENNINGTON: Okay.

3 THE COURT: Petitioner's Exhibit 11 is  
4 admitted.

5 Q. (MS. MALONIS) Mr. Jessop, what's just been  
6 admitted is a certificate of -- if you'll look at what  
7 the Judge has just handed you and tell me if that  
8 refreshes your recollection about whether that company  
9 is still in existence.

10 A. I don't see the name of a company.

11 Q. I believe it's midway down the page.

12 MS. MALONIS: May I approach?

13 THE COURT: Yes, why don't you approach  
14 and...

15 Q. (MS. MALONIS) Okay. Right here where YFZ --

16 A. Oh.

17 Q. Can you see that YFZ Ranch, LLC?

18 A. Excuse me.

19 Q. No problem.

20 A. Your question?

21 Q. My question: Reviewing that document, does  
22 that refresh your recollection about whether or not that  
23 company is still in existence?

24 A. To my understanding, it's -- it's out of  
25 business.

1 Q. Okay. The date on that is September 27th?

2 A. Yeah, I see the date.

3 Q. Okay. So nothing has been done to dissolve  
4 this corporation; is that correct?

5 A. To my knowledge it was dissolved.

6 Q. Okay. Do you have any documents or resolution  
7 that evidences the fact that it was dissolved?

8 A. I don't have here.

9 Q. Okay. Do they exist?

10 A. I think so.

11 Q. Did you participate in drafting those?

12 A. No.

13 Q. Okay. Have you seen them?

14 A. We had a lawyer do it.

15 Q. Okay. Have you seen them?

16 A. I -- I don't know.

17 Q. Okay. What lawyer did you have do that?

18 A. I'm trying to think of their name. Some -- the  
19 Church Law Group in Dallas, Texas.

20 Q. I'm sorry?

21 A. Church Law Group in Dallas, Texas.

22 Q. Okay. And did you pay them for their services?

23 A. I did not, no.

24 Q. Okay. Did the company? The YFZ Ranch, LLC?

25 A. I don't know who did.

1 Q. Does YFZ Land, LLC have any assets?

2 A. None that I'm aware of.

3 Q. Has it ever?

4 A. I don't know.

5 Q. Did it own the -- the YFZ Ranch property?

6 A. I'm assuming it did at one time.

7 Q. Okay. Would that be something that you should  
8 be aware of as a manager of the company?

9 A. State your question.

10 Q. As -- as the managing member of the YFZ Ranch,  
11 LLC, would it not -- would it not be incumbent upon you  
12 to know what assets the company owns?

13 A. I haven't been the manager for some time.

14 Q. Okay. How long has it been since you've been  
15 the manager?

16 A. I don't recall.

17 Q. Do you recall at all what period of time you  
18 were the manager?

19 A. Earlier on. I don't have the timing.

20 MS. MALONIS: Your Honor, may I take that?

21 THE COURT: Yes, thank you.

22 MS. MALONIS: And may I approach the  
23 witness with this?

24 THE COURT: Yes.

25 Q. (MS. MALONIS) Mr. Jessop, this is what was

1 admitted as Exhibit 10. And it's a letter from the  
2 Secretary of State with documents attached to it,  
3 articles of organization dated October 2003, articles of  
4 amendment dated July 2004, articles of amendment dated  
5 August 2004, articles of amendment dated August 2005,  
6 and then four public information reports dated December  
7 of 2005, 2006, 2007 and 2008. And it relates to the  
8 company YFZ Ranch, LLC.

9 A. Okay.

10 Q. Okay. And attached to it, the first document,  
11 articles of organization of YFZ Land, LLC, do you  
12 recognize that document or have you ever seen it?

13 A. I don't recall it. It's possible.

14 Q. Okay. And -- and this is dated October 2003.  
15 Do you have any knowledge about when this company came  
16 into existence?

17 A. I don't recall the date.

18 Q. Okay. Okay. And the next document attached to  
19 this is articles of amendment, dated July 2004. And  
20 it's amending the registered agent and it names Ernest  
21 Jessop. Do you know who Ernest Jessop is?

22 A. Yes.

23 Q. Who is that?

24 A. My son.

25 Q. And it amends the managers and it names David

1 Allred, Ernest Jessop and Raymond Jeffs. Do you know  
2 those men?

3 A. Yes.

4 Q. Who is David Allred?

5 A. He's David Allred.

6 Q. What is your relationship to him?

7 A. I don't have any.

8 Q. Is he a friend?

9 A. I know him.

10 Q. Okay. How do you know him?

11 A. That's my son.

12 Q. Raymond Jessop is your son?

13 A. Uh-huh.

14 Q. Okay. The next document is -- is articles of  
15 amendment dated August 2004, again amending the initial  
16 registered agent and naming Raymond Jessop. And that's  
17 your son?

18 A. Yes.

19 Q. Okay. Did something happen to Ernie in August  
20 of 2004 or do you recall why he would have been removed  
21 as the -- as the registered agent?

22 A. He resigned.

23 Q. And the -- the members of the company, you have  
24 an understanding of what a member of a company is?

25 A. Somewhat.

1 Q. Is it your understanding that a member of a  
2 company is an owner, a stockholder?

3 A. Not necessarily, no.

4 Q. Okay. What is your understanding of what a  
5 member of a company is?

6 A. Just on board of directors and help direct it.

7 Q. Okay. And this names the members David Allred,  
8 Merril Jessop, Joseph Steed and Raymond Jessop. Is that  
9 Merril Jessop you?

10 A. I think so.

11 Q. Okay. So you became a member in August of  
12 2004. Does that sound right?

13 A. I don't recall.

14 Q. Do you have any reason to doubt the  
15 authenticity of --

16 A. Well, as far as what you're saying is a member,  
17 I don't -- it's not of any value to me.

18 Q. Okay. Do you know if this is correct, though?

19 A. Well, I see the writing.

20 Q. Okay. And who is Sharon Leal(sic) who signed  
21 the document?

22 A. I have no idea.

23 Q. Next document, articles of amendment dated  
24 August 2005. Under article five, if you want to follow  
25 along with me: The company is to be managed in whole by

1 managers, as that term is used in Texas Limited  
2 Liability Company Act. The number of initial managers  
3 of the company is one. And then it goes on to define  
4 the terms. And the initial manager is listed as Merril  
5 Jessop. Is that you?

6 A. Correct.

7 Q. Okay. And it lists an address of 2420 CR 300,  
8 Eldorado, Texas 76936. That your address?

9 A. That's correct.

10 Q. Is that the address of your home, your actual  
11 residence or is that the ranch address?

12 A. The ranch.

13 Q. Does your actual residence have a separate  
14 address?

15 A. Yes.

16 Q. What's that address?

17 A. 230 South 150 West.

18 Q. Okay. Same zip code?

19 A. Same.

20 Q. Okay. And this document is signed by Merril  
21 Jessop. Is that your signature?

22 A. Appears to be.

23 Q. Okay. Do you remember signing that?

24 A. No.

25 Q. So did you -- do you have any understanding of

1 what this means?

2 A. I know what it meant to me, yes.

3 Q. Did someone instruct you to sign that or to  
4 prepare this?

5 A. An attorney, yeah.

6 Q. Okay. Other than an attorney, was this --

7 A. Yes.

8 Q. -- your decision to do this?

9 A. Correct.

10 Q. Okay. The next document is a 2005 Texas  
11 franchise tax public information report dated  
12 April 18th, '05. And it lists -- it lists officers and  
13 directors. And it lists Merril Jessop. Is that you,  
14 Merril Jessop?

15 A. I'm Merril Jessop, yes.

16 Q. Okay. Is that Merril Jessop, is that reference  
17 to you?

18 A. Well, I can see it like you see it. I assume  
19 so.

20 Q. Okay. Were you an officer or director in 2005  
21 of this company, YFZ Land, LLC?

22 A. I think so.

23 Q. Okay. And it's signed by Raymond Jessop.  
24 That's your son?

25 A. (Nodded head.)

1 Q. And he has the designation of president. What  
2 was your designation?

3 A. Manager.

4 Q. Okay. And if you'll look where your name is,  
5 it says "title member." Do you see that?

6 A. Yes.

7 Q. Okay. Were you an owner of stock in this  
8 company?

9 A. No.

10 Q. Okay. And it says, under director it's  
11 clicked -- it's checked "yes," so you were a director?

12 A. I -- I'm unaware of the terms, so....

13 Q. Okay.

14 A. I -- I --

15 Q. Do you have a title other than member and  
16 manager?

17 A. Manager.

18 Q. Okay. Did you have another title like  
19 secretary, treasurer?

20 A. No.

21 Q. Next document is Texas franchise tax public  
22 information report 2006. And that one is signed by  
23 Merril Jessop. Is that your signature?

24 A. Appears to be.

25 Q. Okay. Do you remember signing this --

1 A. No.

2 Q. -- or anything like this? Okay.

3 And date is 7/25/06?

4 A. Uh-huh.

5 Q. And it lists David Allred, Raymond Jessop,  
6 Merril Jessop and Joseph Steed as the officers and  
7 directors. And, again, it lists you as a member. Okay?  
8 What is your understanding of what a member of this  
9 company is?

10 A. There's no value to me.

11 MS. HENNINGTON: Your Honor, I'm going to  
12 object. It's already been asked and answered several  
13 times.

14 THE COURT: Let's try not to repeat  
15 questions.

16 MS. MALONIS: Okay.

17 Q. (MS. MALONIS) And it says that you're a  
18 director; is that correct?

19 A. I can't really read it, but....

20 Q. Okay. Do you have any recollection of being a  
21 director --

22 A. No --

23 Q. -- of this company in 2006?

24 A. Well, not in the terms you're talking about.

25 Q. In any terms?

1 A. It's of no value to me.

2 Q. Did you have anything to do with running the --

3 A. Any --

4 Q. -- company or --

5 A. Any --

6 Q. -- making decisions?

7 A. In any of this, member or director or manager  
8 had no monetary value to me.

9 Q. Okay. Did it have -- did you have the  
10 authority to make decisions for this company?

11 A. Limited, yes.

12 Q. Okay. Did you make those in conjunction with  
13 others?

14 A. Sometimes.

15 Q. Okay. Did those decisions include buying and  
16 selling real property?

17 A. No.

18 Q. Who had the authority to buy and sell real  
19 property on behalf of this corporation?

20 A. It never happened, so I don't know.

21 Q. Okay. Okay. 2007 tax -- Texas franchise tax  
22 public information report, again, is that your signature  
23 dated 7/25/07?

24 A. Appears to be.

25 Q. And it lists a daytime phone number

1 505-420-6867, is that your handwriting?

2 A. I don't think so.

3 Q. Okay. Is that your handwriting where the date?

4 (Sic)

5 A. I don't think so.

6 Q. Is that your signature next to it?

7 A. Appears to be.

8 Q. That your handwriting where it says "manager"  
9 next to it?

10 A. It looks like mine, yes.

11 Q. Who else would have dated this and put a phone  
12 number in beside your --

13 A. Probably the lawyer.

14 Q. Okay. Does that phone number look familiar,  
15 505?

16 A. I think that's an old phone number.

17 Q. Okay. And, again, it lists you as member and  
18 director and you don't have any further understanding in  
19 2007 what --

20 A. (Nodded head.)

21 Q. Okay. The next and last document is a Texas  
22 franchise tax public information report for 2008. And  
23 is that your signature on this document?

24 A. It appears to be.

25 Q. Okay. And it's dated 8/11/08. Is this your

1 handwriting? This one's filled out by hand. Is that  
2 your handwriting or is that filled out by someone else?

3 A. Someone else.

4 Q. Okay. And you testified --

5 A. Here's this document.

6 Q. Thank you. And you testified that that -- that  
7 this company never conveyed real property?

8 A. Not to my knowledge.

9 Q. Okay. So the company still owns the YFZ Ranch  
10 property?

11 A. You'd have to restate. I'm not sure where  
12 you're going.

13 Q. Does the YFZ Land, LLC --

14 A. Are you asking if I ever transacted land?

15 Q. No, sir, I'm asking if you testified, and  
16 clarify if you need to, that the YFZ Land, LLC never  
17 conveyed real property.

18 A. You mean like bought and sold property?

19 Q. Yes.

20 A. I -- not that I'm aware of.

21 Q. Okay. So -- and you testified previously also  
22 that the YFZ Land, LLC owned the ranch property. So  
23 does the YFZ Land, LLC --

24 A. Well --

25 Q. -- still own the ranch property?

1 A. Go ahead. I'm sorry, restate your question.

2 Q. Does the YFZ Land, LLC company own the ranch  
3 property?

4 A. I did not think so.

5 Q. Do you have an understanding of who owns that  
6 property?

7 A. It is owned. Of course, I don't recall the  
8 name.

9 Q. Okay.

10 A. I'm sure it would be a public record.

11 MS. MALONIS: Give me just at moment, Your  
12 Honor, to find....

13 (Petitioner's Exhibit 12 marked.)

14 MS. MALONIS: I hand to counsel for review.

15 MS. HENNINGTON: Your Honor, if I may have  
16 a second to review this document.

17 THE COURT: Yes, ma'am.

18 MS. HENNINGTON: Thank you.

19 MS. MALONIS: Your Honor, while she's  
20 reviewing that, if I may -- if I may -- well, I guess  
21 let me have this marked as -- let me have this marked as  
22 Petitioner's 13.

23 And it's going to be a -- an offer of proof  
24 on the issue of --

25 THE COURT: Let her review that. She --

1 she deserves to be able to respond to whatever it is  
2 you're doing.

3 MS. MALONIS: Sure. I'm trying to save  
4 time.

5 THE COURT: You know, I have all the time  
6 in the world.

7 MS. MALONIS: Do you?

8 THE COURT: Yep.

9 (Petitioner's Exhibit 13 marked.)

10 MS. MALONIS: I have not shown it to him.  
11 Do you have any objections to this?

12 MS. HENNINGTON: Your Honor, we're going to  
13 object that it's irrelevant as to the issue of child  
14 support at this time.

15 THE COURT: And this is Exhibit Number 12?

16 MS. MALONIS: This is Exhibit Number 12.  
17 It's a deed of trust.

18 THE COURT: Let me see it, please.

19 It's admitted.

20 MS. MALONIS: Your Honor, if you could hand  
21 that to the respondent when you finish reading it.

22 Q. (MS. MALONIS) Mr. Jessop, can you see that well  
23 enough or do you need me to assist you with it?

24 A. It takes me a minute or two, but I'll get it.

25 Q. Let me know if you can't read it well enough,

1 please.

2 A. Go ahead.

3 MS. MALONIS: Okay. May I approach, Your  
4 Honor, so I can look with the witness?

5 THE COURT: Yes, ma'am.

6 Q. (MS. MALONIS) Is this document familiar to you?

7 A. I think I've seen it.

8 Q. Okay. It's a deed of trust. And the borrower  
9 in this is listed as YFZ Land, LLC, correct?

10 A. Okay.

11 Q. The principal amount is \$929,596 or -- I'm  
12 sorry, \$929,596.66. Do you see where that is?

13 A. I think that's public record.

14 Q. Okay. And -- and the due -- and the final due  
15 date is December 31st, 2008, correct? Do you see that?

16 A. That's what it says, yeah.

17 Q. Okay. And this was dated November 9th, 2008.  
18 Do you -- turning back to the signature page, is that  
19 your signature?

20 A. Appears to be.

21 Q. Okay. And -- and you're listed as Merril  
22 Jessop, manager, correct?

23 A. Correct.

24 Q. Do you have an understanding of what you were  
25 executing on this deed of trust?

1 A. Signing a note.

2 Q. Okay. Okay. Did you sign it in Washington  
3 County, Utah?

4 A. Sure may have.

5 Q. Were you in Washington County, Utah in November  
6 of 2008?

7 A. Must have been.

8 Q. You have any recollection of having been  
9 there --

10 A. Many --

11 Q. -- in the last year?

12 A. -- many times.

13 Q. Okay. And -- and is this a -- does this  
14 evidence a conveyance of real property from YFZ Land,  
15 LLC or at least place a lien on it?

16 A. I think it's a note, yes.

17 Q. Okay. Did -- did --

18 A. Says -- says what it is.

19 Q. Okay. Do you have any -- other than looking at  
20 this document, do you have any independent recollection  
21 of this transaction?

22 A. Just -- just this.

23 Q. Okay. Did the YFZ Land, LLC borrow \$929,596 in  
24 November --

25 A. Yes --

1 Q. -- of '08?

2 A. -- that's what it says.

3 Q. Okay. I'm asking you, do you have any  
4 knowledge of that or understanding of that independently  
5 of looking at this document?

6 A. I have knowledge of this note.

7 Q. Do you have knowledge of a loan being --

8 A. That's what the note says.

9 Q. Okay. Did any money change -- change hands in  
10 this transaction?

11 A. That's what the note says.

12 Q. I'm asking you, sir, it doesn't say -- that's  
13 not what's said in the note. I'm asking you, was there  
14 any transfer of funds from one entity to another as  
15 pursuant to this transaction?

16 A. You know, I -- I do not know.

17 Q. Okay. Does YFZ Land, LLC have any operating  
18 capital?

19 A. They used to have.

20 Q. Okay. What happened to the \$900,000?

21 A. I do not know.

22 Q. Okay. This deed of trust lists Amy Hennington  
23 Attorney-at-Law as the trustee. Do you have an  
24 understanding of what a trustee is in a deed of trust?

25 A. I don't.

1 Q. Okay. Was this -- was this loan or is this  
2 lien to secure attorneys fees?

3 A. Not to my knowledge, no.

4 Q. Okay. One more question. The -- the land  
5 described in this deed of trust, 2420 CR 300, Eldorado,  
6 76936, is that the YFZ Ranch property?

7 A. I think that's the address, yes.

8 Q. Okay. Is that -- do you have an understanding  
9 of whether that's the entire ranch property or a  
10 portion?

11 A. That's just an address on the road.

12 Q. Okay. The legal description on the last page,  
13 and it's a little bit difficult to read, if you'll  
14 review that, if you can tell me what --

15 A. I can't read it. It's too small.

16 Q. Okay. Do you have -- this was November 2008.  
17 Do you have any recollection of what real property you  
18 were placing a lien against? You signed this as manager  
19 of YFZ Land, LLC.

20 A. That address, yes.

21 Q. Do you have an understanding of what property  
22 you were placing a lien against?

23 A. The address at that -- the property at that  
24 address.

25 Q. Okay. The YFZ Ranch?

1 A. That's what it says.

2 Q. Okay. Was it a lien against all of the  
3 property or part of it?

4 A. I do not know.

5 Q. What was your intent, signing that document?

6 A. To pay taxes.

7 Q. Was that money used to pay taxes?

8 A. That's to my knowledge, yes.

9 Q. Who is John Wyman? (Sic)

10 A. He's just an acquaintance.

11 Q. Okay.

12 MS. MALONIS: May I have the next exhibits  
13 marked, I think we're -- we'll skip 13 for now. I think  
14 we're on 14 and 15.

15 (Petitioner's Exhibits 14 and 15 marked.)

16 MS. MALONIS: And we'll proffer to counsel  
17 for review.

18 MS. HENNINGTON: No objection, Your Honor.

19 THE COURT: And that is exhibit what?

20 MS. MALONIS: 14 and 15.

21 THE COURT: Exhibits --

22 MS. MALONIS: And these are warranty deeds.

23 THE COURT: -- 14 and 15 are admitted.

24 MS. MALONIS: Again, if the Court would  
25 hand those to the Respondent after you review them.

1 I'm sorry, Mr. Jessop, do you have those  
2 now? Okay. May I approach the witness, Your Honor?

3 THE COURT: Yes, ma'am.

4 MS. MALONIS: Okay. Do you see that --  
5 that these are -- is it -- Your Honor, do you have the  
6 other one?

7 THE COURT: I gave them. They're both  
8 right here.

9 Q. (MS. MALONIS) Mr. Jessop, can you take that  
10 please?

11 Okay. Did you review these two documents?

12 A. I didn't see this one.

13 Q. Okay. If you would take a moment and review  
14 that.

15 A. Okay.

16 Q. Okay. These two warranty deeds, are you  
17 familiar with -- have you seen these before?

18 A. Yes.

19 Q. Okay. Is that your signature on both of these?

20 A. Yes.

21 Q. Dated December 2008?

22 A. See you asked me before did I buy and sell  
23 land. I did not buy any. This is transferring. I did  
24 not consider that buying and selling.

25 Q. Okay.

1 A. So....

2 Q. Mr. Jessop --

3 A. We misunderstand each other. I beg your  
4 pardon.

5 Q. Okay. Do you recall having -- having seen this  
6 document before?

7 A. Yes.

8 Q. Okay. And what property were you conveying  
9 under these two warranty deeds?

10 A. Whatever it describes.

11 Q. And was that on behalf of the YFZ Land, LLC?

12 A. That's what it says.

13 Q. Okay. Do you remember signing these on behalf  
14 of the YFZ Land, LLC?

15 A. I think so.

16 Q. Okay. What is Texan Heritage?

17 A. That's the company it was sold to or  
18 transferred to.

19 Q. Okay. I'm going to read this. You can follow  
20 along with me. It says that it's sold, conveyed and  
21 warranted. And by these presents does hereby grant,  
22 sell and convey and warrant unto James Jerry Jessop  
23 trustee of Texan Heritage, a common law trust grantee.  
24 Who is James Jerry Jessop?

25 A. That's my son.

1 Q. Okay. And what you do know about the Texan  
2 Heritage Trust?

3 A. Really nothing particularly.

4 Q. Okay. Why did YFZ Land, LLC transfer its real  
5 estate holdings into Texan Heritage Trust?

6 A. They decided to.

7 Q. Why did they decide to?

8 A. On advice of an attorney.

9 Q. Okay. Who makes the decisions for the company?

10 A. The attorney.

11 Q. Okay. You don't make any decisions for the  
12 company as the sole manager?

13 A. No. Well, I chose not to, so....

14 Q. Did your attorney --

15 A. No.

16 Q. -- explain to you why you were transferring on  
17 behalf of this company the real estate holdings into a  
18 trust?

19 A. We asked him to help and that's what he  
20 advised.

21 THE COURT: I'm sorry, sir, you need to  
22 speak up.

23 THE WITNESS: We asked for their help.  
24 This is what they advised. This is what we did.

25 Q. (MS. MALONIS) What were you seeking help with

1 regards to?

2 A. Just --

3 MS. HENNINGTON: Your Honor, objection.

4 That would be attorney/client privileged information.

5 THE COURT: Ms. Malonis?

6 MS. MALONIS: Crime fraud exception. I  
7 mean, I would submit that this is a transfer to defraud  
8 creditors out of their interest in potential assets,  
9 including petitioner.

10 THE COURT: Do you have a next question?

11 MS. MALONIS: I'll withdraw the question.

12 Q. (MS. MALONIS) Which attorney were -- were you  
13 consulting on whatever it was you were seeking help  
14 with?

15 A. The Law Group.

16 Q. Is that the Dallas firm you mentioned --

17 A. Uh-huh.

18 Q. -- a while ago? Okay. Who -- who pays them?

19 A. I do not know.

20 Q. Okay. Do you have any cash in your wallet?

21 A. I have a hundred dollars.

22 Q. Do you have an ATM card?

23 A. I do not.

24 Q. Do you have a bank account?

25 A. I do not.

1 Q. Do you have signature authority on any bank  
2 account?

3 A. I do not.

4 Q. Okay. What is the value of your ownership  
5 interest in the YFZ Land, LLC?

6 A. Zero.

7 Q. Okay. Is that because of the company is worth  
8 zero?

9 MS. HENNINGTON: Your Honor, I think  
10 he's -- objection, Your Honor. I think that's  
11 misleading the characterization of evidence already  
12 testified. Mr. Jeffs (sic) has testified it's his  
13 opinion that YFZ Land, LLC is defunct. And Ms. Malonis  
14 has now provided exhibits of evidence where the land  
15 from YFZ Land, LLC has been parceled out.

16 MS. MALONIS: As well as the certificate of  
17 good standing that the company's still in existence.

18 THE COURT: Please answer the question,  
19 sir.

20 THE WITNESS: What is the question?

21 MS. MALONIS: I don't remember what the  
22 question was. If -- if it's not too much trouble and  
23 the Court Reporter can read it back.

24 THE REPORTER: The last question was:  
25 Okay. Is that because of the company is worth zero?

1           A.   (MS. MALONIS) Okay.  Mr. Jessop, I had asked  
2 you what your ownership interest in YFZ Land, LLC, what  
3 was the value of that ownership interest.

4           A.   Had no interest.

5           Q.   Okay.

6                       MS. MALONIS:  I'm going to mark  
7 Petitioner's 16.

8                       (Petitioner's Exhibit 16 marked.)

9                       MS. MALONIS:  Your Honor, while she's  
10 reviewing that, may I call Ranger Hanna?

11                      THE COURT:  He was in the courtroom a few  
12 minutes ago.

13                      MS. MALONIS:  And the deputy said that he  
14 left.  I don't know if anybody knows if he's coming back  
15 or -- he is coming back?  Never mind, then.

16                      MS. HENNINGTON:  Your Honor, no objection.

17                      THE COURT:  It's admitted.

18                      MS. MALONIS:  Petitioner's 16.

19                      THE COURT:  Would you like to look at 16?

20                      (Handed exhibit to witness.)

21                      MS. MALONIS:  May I approach the witness,  
22 Your Honor?

23                      THE COURT:  You may.

24           Q.   (MS. MALONIS) Do you recognize this document  
25 that was admitted as Petitioner's 16?

1 A. Not offhand, no.

2 Q. Are you familiar, generally, with a declaration  
3 of trust of Texan Heritage?

4 MS. HENNINGTON: Your Honor, I'm going to  
5 object. He's already testified he doesn't recognize  
6 this document.

7 MS. MALONIS: The question was is he  
8 generally familiar with a declaration of trust of Texan  
9 Heritage?

10 THE WITNESS: Not particularly, no.

11 Q. (MS. MALONIS) Okay. On the second to last  
12 page, it's -- there are the signatures of the trustees.  
13 James Jerry Jessop, who is James Jerry Jessop?

14 A. It's my son.

15 Q. Your son. Okay. And do you know Isaac S.  
16 Jeffs?

17 A. Familiar with him, yes.

18 Q. Do you know Keith W. Dutson Sr.?

19 A. Familiar with him.

20 Q. Okay. And are you familiar with an entity  
21 called United Order of Texas?

22 A. I'm familiar with the name, yes.

23 Q. What is -- what is United Order of Texas? If  
24 you can, just describe it generally.

25 A. Well, I say it's a corporation, I guess. I

1 don't -- I don't know what that means particularly.

2 Q. Some kind of association?

3 A. A company of some kind.

4 Q. What does it do?

5 A. I don't know.

6 Q. Are you a part of it?

7 A. No.

8 Q. Okay. Do you know who runs it?

9 A. (No audible response.)

10 Q. Well, it says James Jerry Jessop, president.

11 So do you know -- you don't know anything else about it  
12 besides its name?

13 A. Nothing that I can help you with.

14 Q. Well, do you know anything else about it?

15 A. I see that it exists. I don't know the -- the  
16 details of it.

17 Q. Do you know what kind of business it conducts?

18 A. I don't know that it even conducts any  
19 business.

20 Q. Do you know if it holds property?

21 A. Don't know that for sure.

22 Q. Okay. Do you know anything at all about it  
23 other than the name?

24 A. I know the name is all.

25 Q. Okay. And is this the Texan Heritage that the

1 YFZ Land, LLC conveyed real property to?

2 A. If it says so, I --

3 Q. Are you --

4 A. -- assume so.

5 Q. Okay. Are you aware of another Texan Heritage  
6 other than this trust?

7 A. Not sure. I don't -- I wouldn't think so,  
8 but....

9 Q. You're not aware of one?

10 A. No.

11 Q. Okay. Did you have anything to do with forming  
12 this trust or preparing this document?

13 A. I think the lawyers that we talked about did  
14 all that.

15 Q. Okay. Were you involved in discussions?

16 A. No.

17 Q. Okay. Do you know whose idea it was?

18 A. Lawyers.

19 Q. Okay. The lawyers independently came up with  
20 this?

21 A. Uh-huh.

22 Q. Okay.

23 A. As far as I know.

24 Q. Who would have the authority to -- to approve  
25 something like this with the lawyers?

1 A. Whoever signed this.

2 Q. Okay. All right. And this was -- this was  
3 dated December 31st, 2008, the same day that -- that you  
4 conveyed the real property from YFZ Land, LLC?

5 A. Could be.

6 Q. Okay. Were you aware that it was just coming  
7 into existence in conjunction with this transfer of  
8 property?

9 A. I was just doing what the lawyers put in front  
10 of me, signing -- signing it, yes.

11 Q. Okay. Do you have any understanding of the  
12 legal effect of any of this?

13 A. No.

14 Q. Okay. What do you have -- what were you trying  
15 to accomplish?

16 A. What the lawyers asked us to do.

17 Q. Okay. For what purpose? How would that  
18 benefit YFZ Land, LLC?

19 MS. HENNINGTON: Your Honor, I'm going to  
20 object. It's going into attorney-client privilege.  
21 It's evidence that's irrelevant. This pleading that  
22 we're going forward today wasn't even filed until May of  
23 '09, so it's irrelevant.

24 THE COURT: Well, specifically, how is it  
25 attorney-client privilege?

1 MS. HENNINGTON: She -- she's going into,  
2 you know: Well, why did the lawyers ask you to do this?  
3 I mean, that's really what she's continuing to ask is:  
4 What is your understanding of what did the lawyers tell  
5 you? I think that's attorney-client privilege, whatever  
6 those attorneys told Mr. Jessop.

7 MS. MALONIS: I could rephrase.

8 Q. (MS. MALONIS) What was -- what was YFZ Land,  
9 LLC trying to accomplish in setting up a structure like  
10 this? What was the benefit to the company?

11 A. Just following the attorney's advice.

12 Q. Okay. Was there any benefit to the company for  
13 this?

14 A. I don't know.

15 Q. Do you have any other ownership interest in any  
16 other companies?

17 A. I do not.

18 Q. Have you since 2003 when petitioner and your  
19 children left?

20 A. State the question again.

21 Q. Have you had any ownership interest in -- in  
22 any companies since 2003 when petitioner and your  
23 children left?

24 A. You have to realize I was very ill with a heart  
25 attack. I've had a heart attack since that time. I had

1 a lung operation. Yes, I was participating in some  
2 companies at that time, but they're all defunct and gone  
3 by the board now.

4 Q. Okay. Can you go through a list of companies  
5 you had an ownership interest in since 2002?

6 A. I would have to go get the documents to be  
7 honest about my part of it.

8 Q. Do you -- are those documents readily  
9 accessible, are they scattered?

10 A. They're scattered.

11 Q. Okay. If I go through some entities with you,  
12 will you be able to tell me if you had an ownership  
13 interest in them?

14 A. I could sure try.

15 Q. Do -- what is -- what was your connection with  
16 Lake Powell Estates in Arizona?

17 A. I'm not sure I even recall what.

18 Q. You don't recall any --

19 A. No.

20 Q. -- entity or venture?

21 A. I wouldn't -- wouldn't say I wasn't involved,  
22 but I don't recall.

23 Q. I'm not -- I'm not sure I understand your  
24 answer. Do you not recall that name Lake Powell  
25 Estates?

1 A. I don't off hand, no.

2 Q. Okay. So is it -- is it your testimony that --

3 A. Well, it's my feeling it's possible I had some  
4 connection. I just don't recall that.

5 Q. Is it possible you were an owner?

6 A. Could be, yeah.

7 Q. Okay. Was that a -- was there a six-bedroom  
8 house in Lake Powell Estates that you owned?

9 A. Not that I recall.

10 Q. Okay. Is it possible that -- that it -- that  
11 it was and you just don't recall it or is it you -- do  
12 you --

13 MS. HENNINGTON: Objection. These are  
14 answers. He doesn't recall.

15 THE COURT: I think she's entitled to  
16 clarify what it is he doesn't remember.

17 THE WITNESS: What would be the address?

18 Q. (MS. MALONIS) 224 Cypress, Colorado City,  
19 Arizona.

20 A. Say it again.

21 Q. 224 Cypress, Colorado City, Arizona?

22 A. You have some bad information.

23 Q. Is it your testimony that you did not own  
24 property in Lake Powell Estates?

25 A. Not in Colorado City, Arizona.

1 Q. Okay. In Sandy, Utah?

2 A. Yes, I did have a house in Sandy, Utah.

3 Q. Okay. Was it a six-bedroom house?

4 A. Could have been.

5 Q. Do you know what the value of that house was?

6 A. I think it's -- it was in the neighborhood of  
7 seventy thousand, likely.

8 Q. Do you still own that?

9 A. No.

10 Q. When was that sold?

11 A. Six or eight years ago.

12 Q. Okay. And the proceeds of that sale, how did  
13 you -- what did you do with that money?

14 A. This will surprise you. It went to pay taxes.

15 Q. Okay. Taxes on what?

16 A. Property.

17 Q. Whose property?

18 A. Property I had in Page, Arizona.

19 Q. Okay. What property did you have in Page,  
20 Arizona?

21 A. Property that I went broke on and that company  
22 is defunct.

23 Q. Okay. What property did you own in Page,  
24 Arizona that you were paying taxes on?

25 A. I don't know what you call by name, parcel.

1 Q. Was it land, was it a home? Can you describe  
2 it for me?

3 A. You mean by address or something?

4 Q. I mean just describe anything about it that you  
5 recall.

6 A. It was a piece of land that we had an operation  
7 going on.

8 Q. Okay. What kind of operations?

9 A. We were in the concrete business.

10 Q. Okay. When you say -- when you say "we," is  
11 there someone else you're referring to?

12 A. Well, whenever I say "we," I had many workers,  
13 yes.

14 Q. Okay. Workers under your control?

15 A. Uh-huh.

16 Q. What company...(inaudible).

17 THE REPORTER: I'm sorry. I did not hear  
18 that.

19 Q. What company was it that was performing those  
20 operations?

21 A. (Inaudible).

22 THE REPORTER: I'm sorry?

23 THE WITNESS: General Rock and Sand.

24 Q. (MS. MALONIS) Okay. Is General Rock and Sand  
25 an Arizona corporation?

1 A. Yes.

2 Q. Did it -- were -- were there any other owners  
3 besides you?

4 A. You know, I'd have to go look at the documents.

5 THE COURT: Gentlemen, if you need to  
6 converse, if you would step outside, please. Gentlemen,  
7 that would be you-all on the back row, if you want to  
8 talk, step outside.

9 Q. (MS. MALONIS) Did you -- did you run General  
10 Rock and Sand?

11 A. Yes.

12 Q. Okay. And is that company still in existence?

13 A. I should -- I should say it ran me.

14 Q. Okay. Is that company still in existence?

15 A. No.

16 Q. Okay. So the land in Page, Arizona it -- was  
17 the business actually located there?

18 A. Uh-huh.

19 Q. The concrete business? Okay.

20 Who owns the building that -- that it -- it  
21 did its operations in?

22 A. Who owns it now?

23 Q. Who owned it then.

24 A. Then?

25 Q. Uh-huh.

1 A. General Rock and Sand.

2 Q. Okay. What was that -- what was that land and  
3 building worth?

4 A. I do not know.

5 Q. Did you sell it?

6 A. We tried to trade it and lost -- lost it all.

7 Q. Okay. Lost it how?

8 A. Through a trade off that didn't work.

9 Q. What did you trade -- trade it for?

10 A. That's what we're still hunting.

11 Q. Well, who -- who owns that property now?

12 A. I don't know.

13 Q. Who took title from General Rock and Sand?

14 A. I think it was a company called Americo.

15 Q. Americo?

16 A. I think so.

17 Q. Okay. Is that company owned or owned by one of  
18 your sons?

19 A. No.

20 Q. Do you know anything about that company  
21 Americo?

22 A. I don't.

23 Q. Okay. Other than General Rock and Sand -- I'm  
24 sorry, let me backtrack a little bit. So you -- your  
25 property in Lake Powell Estates, when -- what period of

1 time did you have property in Lake Powell Estates?

2 A. Arthur what day would it be?

3 MS. HENNINGTON: Mr. -- Mr. Jessop, if I  
4 may, Your Honor, you need to answer only the questions  
5 that Ms. Malonis asks you. Okay?

6 THE WITNESS: I don't know.

7 Q. (MS. MALONIS) And I'm just looking for years,  
8 what years. You don't remember when you last --

9 A. I can give it --

10 Q. -- owned that?

11 A. -- to you in ten years.

12 Q. Do you own any other property in Utah?

13 A. No.

14 Q. You don't own any property in a subdivision  
15 called White City?

16 A. I think that was the house you were talking  
17 about.

18 Q. Okay. Do you -- in the time period we're  
19 talking about, from 2002 to the present time, have you  
20 owned any other real property?

21 A. You'd have to help my -- take me where it might  
22 be. I -- I don't recall.

23 Q. Okay. I'll get back to that.

24 Have you had any interest in any other  
25 businesses other than General Rock and Sand and YFZ

1 Land, LLC?

2 A. I've had many interests in many of the -- over  
3 the years, yes.

4 Q. Okay. Can you list your business interests  
5 since 2002?

6 A. Hum.

7 Q. Just the ones that you recall.

8 A. I'm -- if you give me a few minutes, I could  
9 think of some of them. I had a trucking business called  
10 M. J. Direct, I think it was.

11 Q. Okay. What -- what state was that in?

12 A. I think it was Utah.

13 Q. Okay. Any others?

14 A. Business that I owned, you mean?

15 Q. That you had any -- any interest in.

16 MS. HENNINGTON: Your Honor, simply this is  
17 only businesses from --

18 THE COURT: Ma'am?

19 MS. HENNINGTON: What was the date again?

20 MS. MALONIS: 2002 to the present.

21 MS. HENNINGTON: I just wanted to make sure  
22 I was clear in my notes. Thank you.

23 MS. MALONIS: Sure.

24 THE WITNESS: I don't have the dates, so I  
25 don't know.

1 Q. (MS. MALONIS) Okay. Do you have any -- any  
2 ownership or management interests in cooperative  
3 financial services?

4 A. I don't.

5 Q. Okay. Have you ever?

6 A. Did you say manager?

7 Q. Owner or manager, yes.

8 A. I don't have any owner. I was involved in some  
9 management, yes.

10 Q. Okay. Do you -- can you tell me what time  
11 period that was in years?

12 A. I don't know.

13 Q. Are you still in the -- involved in the  
14 management?

15 A. Very little.

16 Q. Okay. Is that a "yes" you are still --

17 A. Yeah.

18 Q. -- involved some?

19 A. They call me once in a while and ask questions.

20 Q. Okay.

21 A. I answer them if I can.

22 Q. What type of company is that?

23 A. It's a mercantile company.

24 Q. I'm sorry. I couldn't hear.

25 A. Mercantile.

1 Q. Mercantile?

2 A. Uh-huh.

3 Q. And I'm talking about Cooperative Financial  
4 Services.

5 A. I may have been. I don't recall.

6 Q. Okay. That's the entity -- and I'm sorry if I  
7 misspoke. That's the entity that I was just asking you  
8 about, that you -- I thought you said you were still  
9 manager of?

10 A. No. No.

11 Q. Or you still had something --

12 A. No.

13 Q. What entity were you talking about?

14 A. The mercantile.

15 Q. Okay. Is that Cooperative Mercantile?

16 A. Yes, I think so.

17 Q. Where is that located?

18 A. That's at Short Creek.

19 Q. In Utah or Arizona?

20 A. Arizona.

21 Q. Okay. Are you an officer or director of  
22 Cooperative Mercantile?

23 A. I would have to look at the documents to know.  
24 I don't know.

25 Q. You don't know?

1 A. I don't.

2 Q. Do you know if Cooperative Mercantile generates  
3 a profit yearly?

4 A. I -- I think they do.

5 Q. Okay. Does it have employees that it pays?

6 A. Have what?

7 Q. Does it have employees that it pays?

8 A. I think so.

9 Q. Do you ever get a paycheck from it?

10 A. I do not know. I don't, is what I'm trying to  
11 say.

12 Q. Okay. Have you ever?

13 A. Could have way back, yes.

14 Q. Okay. Can you tell me generally what you mean  
15 by way back? More than ten years ago or --

16 A. I don't know that. I would have to get the  
17 records to know. I don't know.

18 Q. Okay. Have you received any kind of paycheck  
19 within the last ten years from Cooperative Mercantile?

20 A. I don't know the dates.

21 Q. Okay. Do you -- do you now own or have you in  
22 the -- since 2002 owned any property in Big Water, Utah?

23 A. Since 2002?

24 Q. Since 2002.

25 A. I don't know the dates.

1 Q. Have you ever owned property or had any --

2 A. Yes.

3 Q. Okay.

4 A. Well, you're talking about me, personally?

5 Q. You or -- or a business that you had an  
6 ownership interest or management of?

7 A. I -- I do not know how it was listed.

8 Q. Okay. What -- describe for me, if you would,  
9 your recollection of whatever relationship you had to  
10 property in Big Water, Utah.

11 A. I managed it. I don't recall how the ownership  
12 was listed. I don't recall.

13 Q. What kind of property was it?

14 A. Some of it was bare land. Some of it was lots,  
15 some of it was the motel.

16 Q. What was the name of the motel?

17 A. Highway Host, I believe.

18 Q. Okay. And did -- did you, or whatever entity  
19 it was, sell that property?

20 A. Yes. Yes.

21 Q. Do you recall when that was?

22 A. The company did. I -- when you say me and the  
23 company, you've got to differentiate those. I don't  
24 know.

25 Q. Okay.

1 A. I don't recall.

2 Q. Do you recall how much -- how much revenue was  
3 generated from the sale of that property?

4 A. I -- I don't.

5 Q. When these properties would be sold, who would  
6 receive the funds for that or how was that taken care  
7 of?

8 A. As I recall, excuse me, General Rock and Sand,  
9 they were in very tough shape and monies went to pay  
10 their bills.

11 Q. Okay. Did General Rock and Sand have a bank  
12 account?

13 A. I'm sure they did.

14 Q. Do you recall if they did?

15 A. Yes, absolutely sure they did.

16 Q. Okay. So when these properties were sold, the  
17 funds would have gone into General Rock and Sand's bank  
18 account?

19 A. I would think so, yes. You have to realize I  
20 had a heart attack in '96, I believe is the time. And  
21 what happened after that, I -- I'm really out of touch  
22 with.

23 Q. Okay. Do you -- did your -- is your health  
24 issues have -- have any bearing on your memory at all?  
25 And I don't mean that to be insulting.

1 A. Very much so, yes.

2 Q. Okay. And do you recall any other real  
3 property that you had an interest in since 2002 or -- or  
4 a business?

5 A. I just don't have the dates where I can say yes  
6 or no, according to date.

7 Q. What would you look at to determine those  
8 dates? Do you have those types of records?

9 A. I -- if I had them, the State now has them.

10 Q. I'm sorry. I didn't understand what you said.

11 A. If I had them, the State now has them.

12 Q. Okay. What is -- are you a member of the FLDS  
13 church or --

14 MS. HENNINGTON: Objection, irrelevant.

15 THE COURT: Why is it irrelevant?

16 MS. HENNINGTON: If he's a member of the  
17 church is not relevant to the amount of child support.

18 THE COURT: Why is it a relevant question,  
19 Ms. Malonis?

20 MS. MALONIS: Your Honor, because I believe  
21 that he holds a particular position within that church.  
22 And although it is a church religious organization, it  
23 also acts as a -- as a community unto itself. And I  
24 believe that he has control of assets and property and  
25 manages those types of things at -- within his position

1 in that organization.

2 MS. HENNINGTON: Your Honor, I think that,  
3 one, there's not been -- she's arguing that he has all  
4 this, but the church -- whether he's a member of a  
5 church or not has nothing to do if there's income that  
6 he has available or resources available to him.

7 I mean, you know, she asked if he has a  
8 paycheck or if they give him money, I mean, I could see  
9 how that's relevant, but his position or membership in  
10 a --

11 THE COURT: So you couldn't ask someone if  
12 they were a priest in the church? In a Catholic Church  
13 you couldn't ask the father if he was a priest?

14 MS. HENNINGTON: I think you could ask  
15 that. But I think the relevant issue before the Court  
16 is whether or not he receives an income from the many  
17 positions or has assets available to him, not, you know,  
18 if it -- in a situation with a priest, if the priest is  
19 asked, "Do you work there?" and -- and then you can't  
20 get into the assets -- go any further into them. I  
21 don't think it's relevant whether, I mean, he's a priest  
22 or a member of the church.

23 THE COURT: Well, it wouldn't be relevant  
24 for a priest on child support, let's hope. But since --

25 MS. HENNINGTON: Well, some of the newer --

1 some of the new priests, they have -- have families.

2 THE COURT: Rephrase your question,

3 Ms. Malonis.

4 Q. (MS. MALONIS) Are you -- do you hold a  
5 leadership position of any organization in Texas?

6 A. You'd have to describe more what that means.

7 Q. Mr. Jessop, that -- that's information that you  
8 have the --

9 A. You mean, how I consider it or how you might?

10 Q. How you -- how do you consider it?

11 A. I -- I don't consider I have much.

12 Q. Okay. You're not a leader of any organization?

13 A. Not formally, no.

14 Q. Okay. Do some people refer to you as "bishop"?

15 A. I think so, yes.

16 Q. Okay. And what is your understanding of what  
17 bishop means in that context?

18 MS. HENNINGTON: Your Honor, I'm going to  
19 object at this time and invoking on my client's behalf  
20 his right to Fifth Amendment to not incriminate himself.  
21 There is a pending charge against Mr. Jessop in which  
22 the allegation is it -- whether -- under the Family Code  
23 Section 2.2, whether or not he performed a ceremony, had  
24 the ability to perform a ceremony, so...

25 THE COURT: Next question.

1 MS. MALONIS: Okay.

2 Q. (MS. MALONIS) As -- as bishop of whatever it is  
3 you're bishop of, did you have control of that  
4 organization's funds?

5 MS. HENNINGTON: Your Honor, objection.  
6 She's misstating it.

7 THE COURT: Answer the question.

8 THE WITNESS: Like a banker would, he  
9 handles money. I did, but I could not spend it at my  
10 will.

11 Q. (MS. MALONIS) Okay.

12 A. It wasn't for me.

13 Q. Okay. And having control of that, what does  
14 that mean, do you have -- was there a bank account that  
15 you had access to?

16 A. Fairly short -- for a short time, yes.

17 Q. Okay. What bank?

18 A. Bank of America.

19 Q. Okay. How is that account styled?

20 A. YFZ, I believe.

21 Q. Anything after YFZ or just YFZ?

22 A. I don't recall.

23 Q. Okay. And you had check writing authority?

24 A. I did for a time, yes.

25 Q. Did anyone else -- while you had check writing

1 authority, did anyone else have check writing authority?

2 A. Yes, I think so.

3 Q. Who else had check writing authority?

4 A. I believe Ernie, if I --

5 Q. Okay.

6 A. If my memory serves me.

7 Q. At the same time you did?

8 A. I think so.

9 Q. Anyone else?

10 A. I don't recall.

11 Q. Where did the funds come from that were in that  
12 account?

13 A. Everywhere.

14 Q. Give me examples.

15 A. I -- I did not receive them, so I don't know.

16 Q. You don't have any idea how funds got deposited  
17 in that account?

18 A. I don't.

19 Q. Did you ever deposit funds in that account?

20 A. Yes.

21 Q. Okay. Where did the funds come from that you  
22 deposited?

23 A. Some of it was set by my door, my office. And  
24 I do not know where they come from.

25 Q. Some of it was -- I'm sorry. I didn't

1 understand you, if you could repeat that.

2 A. Set by my door in my office.

3 Q. Set by your door?

4 A. Uh-huh.

5 Q. Okay. In the form of cash or checks or  
6 property or how?

7 A. Both. Pretty hard to set property by your  
8 door.

9 Q. Is your -- where is your office located?

10 A. On the ranch.

11 Q. Okay. So if some -- did you say some of that  
12 was by checks, some of the property that was set there?

13 A. As I recall.

14 Q. Okay. Would that be -- would those checks be  
15 signed or could you determine who they were from?

16 A. Everybody, everywhere. I -- I don't know.

17 Q. Okay. What --

18 A. I have no record of it.

19 Q. Okay. Did you -- did you always recognize the  
20 people who were giving you checks?

21 A. Once in a while.

22 Q. Did you ever not recognize?

23 A. Oh, all the time.

24 Q. Who had access to your office that could put --  
25 that could put money at your door?

- 1           A.    Outside door.
- 2           Q.    Okay.
- 3           A.    We didn't have locks there.
- 4           Q.    Could I get in your office?
- 5           A.    Uh-huh, yeah, you could.
- 6           Q.    Does anyone have general access to the ranch
- 7 property?
- 8           A.    When you say anyone, I don't know what you
- 9 mean.
- 10          Q.    I mean anyone besides the people who live
- 11 within the wall of the community.
- 12          A.    I don't know that for sure.
- 13          Q.    Is there a gate?
- 14          A.    Yeah.
- 15          Q.    Okay. Who can open the gate?
- 16          A.    Anyone with a key.
- 17          Q.    Okay. Who has keys?
- 18          A.    Your guess is as good as mine.
- 19          Q.    Do you have a key?
- 20          A.    No.
- 21          Q.    If you wanted to go out of that gate, who would
- 22 you talk to?
- 23          A.    Ms. Malonis, are you talking then or now?
- 24          Q.    I'm sorry?
- 25          A.    Are you talking then or now?

1 Q. For the time period that money appeared at your  
2 door.

3 A. Yes, I had a key.

4 Q. Okay. Is there -- is there any possibility  
5 that someone outside of the people who lived in that  
6 community would put checks at your door?

7 A. They sure tried.

8 Q. Did that ever happen?

9 A. I don't know.

10 Q. You don't recall?

11 A. I don't know.

12 Q. Okay. In a year's time, how much -- how much  
13 money was left at your door, would you estimate?

14 A. I'd be speculating. I don't know.

15 Q. Okay. Do you have a range of how much money  
16 that would be?

17 A. Huh-uh. No, I'm under oath and I choose not to  
18 not speculate on it.

19 Q. Okay. And when -- when that money appeared at  
20 your door, how would -- who would it be written to?

21 A. Mostly just blank, as I recall.

22 Q. Okay. And did you -- who would you fill in as  
23 the payee?

24 A. You mean pay to?

25 Q. Yes.

1 A. YFZ.

2 Q. And were there conditions on how -- attached to  
3 those checks on how you were directed to spend those  
4 funds?

5 A. No.

6 Q. Okay. Did you ever use any of those funds to  
7 pay child support?

8 A. No, they were not my funds.

9 Q. Okay. Did you have, as -- as bishop of the  
10 organization, did you have control of any other property  
11 or -- or funds other than the funds that were left at  
12 your door?

13 A. Any other property?

14 Q. Uh-huh.

15 A. What do you mean by property?

16 Q. Any property, real property, personal property,  
17 any kind of property?

18 A. Not that I can remember.

19 Q. Okay. In that organization that you're bishop  
20 of, is there anybody who has more authority than you or  
21 you report to?

22 MS. HENNINGTON: Objection, irrelevant.

23 THE COURT: Ms. Malonis, why is it  
24 relevant?

25 MS. MALONIS: I'm trying to determine what

1 control he had over the funds, whether it was -- he was  
2 acting on his own or whether he was directed to do  
3 certain acts, and the voluntariness of it, what was  
4 available for -- to him.

5 THE COURT: Answer the question, please.

6 THE WITNESS: What's your question?

7 Q. (MS. MALONIS) As bishop of that organization,  
8 was there -- was there anybody you reported to who was  
9 higher than you, who had a greater authority than you,  
10 or who could direct --

11 A. No, I was at --

12 Q. -- your activities?

13 A. No, I was at liberty to do what I --

14 Q. Okay. Thank you.

15 A. -- what I felt was necessary for the people  
16 there.

17 Q. And how -- how many people -- was it your job  
18 to -- to determine what was necessary for the people  
19 there?

20 A. No.

21 Q. Okay. You just testified that you were at  
22 liberty to take care of what was necessary for the  
23 people there. What did you mean by that?

24 A. Well, when a request was made, I could take  
25 care of it.

1 Q. Okay. You mean a request by an individual  
2 person?

3 A. Or everybody, anybody, yes.

4 Q. Okay. Can you give me an example of such a  
5 request?

6 A. Well, a person had a dental bill they needed to  
7 go to, that was made available to them.

8 Q. Okay. Give me -- can you give me another  
9 example?

10 MS. HENNINGTON: Judge, irrelevant.

11 THE COURT: Overruled.

12 THE WITNESS: Whatever -- whatever people  
13 needed to do.

14 Q. (MS. MALONIS) Okay. Did you use that money to  
15 purchase things for people?

16 A. I didn't do it myself, no.

17 Q. Okay. Was that money used to purchase things  
18 for people?

19 A. Yeah, used for the community, yes.

20 Q. Okay. You have any understanding of how much  
21 money -- it -- it takes to -- to take care of the  
22 people's needs in the community?

23 A. Hum, I -- speculation again. I don't know.

24 Q. Okay. Are you familiar with the company called  
25 Jessico, Inc.?

1 A. Yes.

2 Q. Are you the registered agent?

3 A. No.

4 Q. Have you ever been the registered agent?

5 A. It's possible.

6 Q. Have you ever had management authority or  
7 ownership interest in Jessico?

8 A. I may have when I first began.

9 Q. Okay. What kind of company was that?

10 A. Construction company.

11 Q. Okay. Do you know who else was involved in  
12 running that company?

13 A. Again, please. I didn't hear you.

14 Q. Oh, I'm sorry. Can you tell me who else was  
15 involved in running that company?

16 A. My son Fred --

17 Q. Fred?

18 A. -- owned the company, I believe.

19 Q. Okay. Is that a -- what state is that company  
20 in?

21 A. It operated in several states. I don't know  
22 where they're registered.

23 Q. Okay. Do you know where it principally did  
24 business?

25 A. Probably Arizona.

1 Q. And did it own equipment?

2 A. I'm sure.

3 Q. Do you know if that -- if Jessico had a bank  
4 account?

5 A. I'm sure they did.

6 Q. Did you have -- did you have any -- any  
7 authority over that bank account?

8 A. Not that I recall, no.

9 Q. Was your son Raymond involved in that company,  
10 as well?

11 A. I think he was at a time, yes.

12 Q. Okay. If there were financing statements that  
13 were signed on behalf of Jessico, did you have the  
14 authority to sign those financing statements?

15 A. Not that I recall.

16 Q. Did General Rock and Sand have any business  
17 relationship with Jessico?

18 A. They worked together. I don't know what you  
19 mean by relationship.

20 Q. How did they work together?

21 A. They did jobs for each other.

22 Q. Okay. Would one be a subcontractor of the  
23 other?

24 A. Sometimes, yeah.

25 Q. And -- and would General Rock and Sand be a

1 subcontractor of Jessico?

2 A. It's possible, yes.

3 Q. Okay. Did that happen as a regular -- on a  
4 regular basis?

5 A. More irregular.

6 Q. Okay. Are you familiar with the company called  
7 Alamo Assurance?

8 A. What's the name again?

9 Q. Alamo Assurance.

10 A. I -- I --

11 Q. You're not familiar?

12 A. It doesn't register, no.

13 Q. Are you a director or owner of any business  
14 interest of companies of Texas?

15 A. Companies?

16 Q. Uh-huh, companies, ventures, partnerships  
17 business associations?

18 A. I -- I don't think so.

19 Q. Okay. Are you familiar with a -- the Caliente  
20 Hot Springs Motel?

21 A. Yeah.

22 Q. Does that sound familiar? What is that?

23 A. What is that or what was it?

24 Q. What is it or what was it? What is your  
25 understanding of it?

- 1 A. It was a motel.
- 2 Q. Okay. Did you have anything to do with that?
- 3 A. Yes.
- 4 Q. Did you -- were you an owner or partial owner?
- 5 A. Partial, yes.
- 6 Q. Okay. Was that -- what state was that in?
- 7 A. Nevada.
- 8 Q. All right. Did you -- were you involved in the  
9 renovation of that motel?
- 10 A. Yes, I think so.
- 11 Q. And were you involved in management of that  
12 motel at some -- for some period?
- 13 A. Part of the time, yes.
- 14 Q. Okay. Was -- was Arthur Blackmore one of your  
15 partners in that venture?
- 16 A. Yes.
- 17 Q. Did you have other partners?
- 18 A. Yes, for a time.
- 19 Q. Was Paul Jessop a partner?
- 20 A. I think so.
- 21 Q. Did you buy out his interest?
- 22 A. Yes.
- 23 Q. Was that entity -- was that property sold?
- 24 A. Yes.
- 25 Q. Okay. Do you remember when?

- 1           A.    I don't.
- 2           Q.    Did it -- was a profit generated when it sold?
- 3           A.    I don't know.
- 4           Q.    Do you remember the sales price?
- 5           A.    I don't.
- 6           Q.    I'm sorry. Did I -- did I ask you what -- when
- 7 that was, what year that was sold; do you recall?
- 8           A.    I don't recall.
- 9           Q.    Okay. Did you have ownership interest in any
- 10 other motels?
- 11          A.    Yes, I think so.
- 12          Q.    Okay. Do you recall -- can you tell me the
- 13 names, please?
- 14          A.    I don't recall the name.
- 15          Q.    I'm sorry?
- 16          A.    In Porterville, Utah. (Sic) I don't recall the
- 17 name.
- 18          Q.    In Orderville, Utah, that was a motel?
- 19          A.    Wait a minute. Orderville? Yes.
- 20          Q.    Okay. And was -- did you have partners in that
- 21 venture?
- 22          A.    Yes.
- 23          Q.    Who were your partners?
- 24          A.    Arthur.
- 25          Q.    Okay. And we're talking about Orderville?

1 A. Uh-huh.

2 Q. And that was a motel. Was that sold? Was that  
3 foreclosed on?

4 A. As I recall.

5 Q. Okay. Did you have any interest in Warm Creek  
6 Motel?

7 A. Yes.

8 Q. And where was that?

9 A. Big Water, Utah.

10 Q. Okay. Do you recall generally the time frame?

11 A. The what again?

12 Q. Do you recall generally the time frame that you  
13 were involved in that?

14 A. I don't have those dates.

15 Q. Okay. Do you recall if it was before  
16 petitioner left or after?

17 A. About the same time.

18 Q. Okay.

19 A. It seems like, I'm sorry.

20 Q. Okay. And do -- do you recall what happened to  
21 that property or do you still -- is it still in  
22 existence? Do you still own it?

23 A. No.

24 Q. So do you remember what kind of funds were  
25 generated from it or what happened to those funds?

1           A.    It just went into a part of the bills that I  
2 owed.

3           Q.    Okay.  What do you owe bills for?

4           A.    I don't think you want that list.

5           Q.    I do.

6           A.    Okay.  Prepare yourself.  I don't mean to be  
7 funny, it's just I owed a lot of money.

8           Q.    Okay.  And this is at what -- what period of  
9 time are we -- are you talking about?

10          A.    I -- I can't speculate on time.  I don't know.

11          Q.    Okay.  Well, let me -- you just had a list --  
12 you've referenced a list of expend -- or bills.  What --  
13 go through that list with us.

14          A.    I -- I couldn't do that right now.

15          Q.    Why not?

16          A.    Well, I just don't recall them.

17          Q.    Okay.  Was there a -- were you involved in an  
18 entity or property in Saint George, Utah, a long-term  
19 care facility or assisted living?

20          A.    Yes, I think so.

21          Q.    Okay.  And --

22          A.    What city are you talking about?

23          Q.    Okay.  I might -- I might have that wrong.  
24 Cedar Manor, and I'm not certain of the name.

25          A.    You said Saint George.

1 Q. Okay.

2 A. Nothing in Saint George.

3 Q. Okay. Was there a facility or property by the  
4 name of Cedar Manor?

5 A. I think that's a name.

6 Q. Okay. And was that a -- a nursing home or a  
7 long-term care facility?

8 A. It was a rest home.

9 Q. Okay. And you owned -- you partially owned  
10 that?

11 A. I did at one time, yes.

12 Q. Okay. And did you -- was that a property that  
13 you developed or took over management or what was your  
14 involvement in that?

15 A. I was just a partner in it.

16 Q. A partner in developing it --

17 A. Uh-huh.

18 Q. -- or running it?

19 A. Some, both.

20 Q. Okay. And that was sold?

21 A. Uh-huh.

22 Q. Do you remember where the proceedings from that  
23 sale went?

24 A. Went into the trucking business.

25 Q. Okay. What was the name of the trucking

1 business?

2 A. It's that direct I was telling you about  
3 before.

4 Q. Okay. Was that Royal Direct?

5 A. No.

6 Q. Just -- are you familiar with Royal Direct?

7 A. I've heard the name.

8 Q. You didn't have anything to do with that?

9 A. I don't have any --

10 Q. Okay.

11 A. -- any connection with it as far as running it  
12 or anything.

13 Q. Did you -- did you own or have an interest in  
14 some commercial property in Hurricane, Utah?

15 A. There was some connection, yes. I don't recall  
16 the -- I faintly remember something about Hurricane,  
17 yes.

18 Q. Okay. When you -- when the -- when the  
19 Caliente Hot Springs Motel was sold, was there a -- was  
20 the payout structured in -- in that part of it was  
21 payable over a period of time and part of it was payable  
22 in cash? Do you recall?

23 A. I don't remember the detail.

24 Q. Okay. Are you familiar with a company called  
25 General Rock Products?

1 A. Yes.

2 Q. What's your involvement with that or what was  
3 your involvement with that?

4 A. Excuse me. No involvement.

5 Q. Okay. How do you know of that company?

6 A. How do I know it?

7 Q. Yes.

8 A. It was set up right at the site where I was.

9 Q. I'm sorry. It was set up what?

10 A. Set up right in the same yard that I was.

11 Q. Okay. Where was that?

12 A. Short Creek.

13 Q. Okay. When you say set up in the same yard,  
14 what do you mean by that?

15 A. Side by side company.

16 Q. Okay. The physical location of the business?

17 A. Uh-huh.

18 Q. Or some kind of operation?

19 A. Physical location.

20 Q. Okay. Do you know who was involved in General  
21 Rock Products?

22 A. I -- I don't know for sure.

23 Q. Was your son Nathan involved with that?

24 A. Could have been, yes. I think there were  
25 several people.

1 Q. Okay. And did you -- did General Rock Products  
2 have a -- a business relationship with General Rock and  
3 Sand?

4 A. Yes, they had a relationship. They squabbled  
5 over money, who owed who.

6 Q. Okay. And how would it come about that either  
7 company would owe the other one money?

8 A. Just whatever business they did with each  
9 other.

10 Q. What kind of business did they do with each  
11 other?

12 A. It could have been machine rental or could have  
13 been digging.

14 Q. Okay. Were they --

15 A. Construction, some kind of valuable.

16 Q. Okay. What -- were General Rock and Sand and  
17 General Rock Products in the same business?

18 A. No.

19 Q. Same type of business?

20 A. Yeah, pretty much same.

21 Q. Is General Rock Products an ongoing business,  
22 do you know?

23 A. I do not know.

24 Q. Are you -- you don't have any ongoing  
25 involvement with that?

1 A. Any what?

2 Q. Any ongoing involvement with General Rock

3 Products?

4 A. No.

5 Q. Are you in communications with your son Nathan?

6 A. I've talked to him the last year or so, yes.

7 Q. Okay. Are you familiar with the company called

8 General Concrete Products?

9 A. I'm -- I don't recognize it, no.

10 Q. Okay. Other than your money that showed up at

11 your door, and you may have taken a paycheck from

12 Cooperative Mercantile, social security and some

13 undetermined amount of funds from the sale of these

14 properties, what other funds have you had access to?

15 A. You're mixing it up too much. You need to

16 identify.

17 Q. I'm sorry?

18 A. You're mixing it. I can't tell what you're

19 saying.

20 Q. Okay. Can you give me a complete list of any

21 sources of funds available to you since 2002?

22 A. Social security is all I have.

23 Q. Okay. Do you recall that you -- that you

24 testified a moment ago that you received some kind of

25 paycheck from Cooperative Mercantile?

1 A. No, I didn't. You mean way back I said?

2 Q. Okay.

3 A. Could have been way back something.

4 Q. Okay. Was that prior to 2002?

5 A. I don't know.

6 Q. Okay. I'm not sure I understand your  
7 testimony. Is it your testimony that since 2002 you  
8 have not received any kind of paycheck from Cooperative  
9 Mercantile?

10 A. I don't know about the dates.

11 Q. Okay. And other than the property, the real  
12 property that we talked about, have you owned any other  
13 real property or had a business interest that owned any  
14 other real property?

15 A. Not that I can recall. But I wouldn't --

16 Q. Okay.

17 A. -- sit here and say no, because I -- it's  
18 possible I owned a lot here or there, someplace.

19 Q. Okay. If you have -- if, for instance,  
20 hypothetically, if you needed dental work, could you  
21 take money from that fund that you provide for the other  
22 members?

23 A. No, I go to the social security doctor there.

24 Q. Okay. How much money is in that account?

25 A. Which account?

1 Q. The account that -- that the funds, the Bank of  
2 America account that you referenced.

3 A. How much was in it?

4 Q. How much -- how much is in it now?

5 A. That's long gone. I don't know. There's no  
6 account.

7 Q. It doesn't exist? Okay. Are you still bishop?

8 MS. HENNINGTON: Your Honor --

9 THE WITNESS: Some say "yes" some say "no."

10 Q. (MS. MALONIS) Okay. Is there -- is there  
11 someone else who manages the funds now in the same  
12 manner that you described that you --

13 A. Yes.

14 Q. -- formerly did?

15 A. I assume so, because I -- I don't.

16 Q. Okay. And when did you stop managing those  
17 funds?

18 A. At the time of the raid.

19 Q. Okay. So if there was something you needed  
20 from a fund, who would you approach and discuss that  
21 with?

22 A. I haven't needed anything so I --

23 Q. If you did?

24 A. If I did? I'd go ask.

25 Q. Who -- right, who would you ask?

1 A. Probably Jim.

2 Q. Jim Jessop, your son?

3 A. Uh-huh.

4 Q. Okay.

5 THE REPORTER: Judge, could we take a  
6 break?

7 THE COURT: All right. We'll take a  
8 five-minute break.

9 (Recess.)

10 THE COURT: Okay. Ms. Malonis.

11 MS. MALONIS: Yes.

12 Q. (MS. MALONIS) Mr. Jessop, are you familiar with  
13 a corporation by the name of Dynamic American  
14 Corporation?

15 A. I've heard the name, yes.

16 Q. Did you have any interest in that company?

17 A. Interest, as I recall, I owned just a few  
18 shares of stock at one time.

19 Q. Okay. Do you recall who the other stockholders  
20 were?

21 A. Hum, I don't know.

22 Q. What -- what was that company in the business  
23 of doing?

24 A. I'm not sure whether they were in the land  
25 business or they had something to do with newspaper

1 print. I'm not certain.

2 Q. Okay. Did you have anything to do with running  
3 that company?

4 A. No.

5 Q. Or managing it?

6 A. No.

7 Q. Are you familiar with a company called T. L. M.  
8 Investments, Inc.?

9 A. P. L. what?

10 Q. T. L. M. Investments, Inc.

11 A. No.

12 Q. No? Okay. Were you a -- were you a principal  
13 in Lake Powell Village Resort, Inc., a Utah corporation?

14 A. Lake Powell Village?

15 Q. Lake Powell Village Resort, Inc.?

16 A. I had something to do with some condominiums.  
17 I don't recall the name of it.

18 Q. Okay. Have you owned property in Glen Canyon,  
19 Utah?

20 A. Yes. That's where the Warm Creek Motel was.

21 Q. Okay. Was that just -- was that one piece of  
22 real property or was there more than one?

23 A. As I recall it was -- it was different -- a  
24 couple of different lots.

25 Q. Okay. Was -- was there a development on -- on

1 the lots?

2 A. Hum. The one lot had a little store on it that  
3 burned down. And I don't -- well, there may have been  
4 a -- the restaurant built, yeah, on one of the other  
5 lots.

6 Q. A restaurant?

7 A. Restaurant, yes.

8 Q. Did you have anything to do with managing that  
9 restaurant?

10 A. I'm sorry to report, yes.

11 Q. Okay. Did you -- did you draw any kind of  
12 income or -- or payroll from the operations of the  
13 restaurant?

14 A. It was a great loss.

15 Q. You never took a paycheck from --

16 A. No.

17 Q. -- from the restaurant?

18 A. No.

19 Q. Do you know what time -- what period of time  
20 that was?

21 A. Hum, I don't.

22 Q. You don't recall?

23 A. No.

24 Q. Have you owned property in the Salt Lake Basin  
25 or Salt Lake Basin Meridian?

1 A. That was the one home that you spoke of.

2 Q. Is that in Sandy?

3 A. I believe that's in Sandy, yes.

4 Q. Have you or an entity owned by you ever  
5 transferred real property to R and W Cattle?

6 A. Say it again.

7 Q. Have you or an entity owned by you transferred  
8 real property to R and W Cattle?

9 A. State the name again, I'm sorry.

10 Q. I'm sorry?

11 A. I didn't hear the name.

12 Q. R and W Cattle.

13 A. I don't recognize that name.

14 Q. That name is not familiar to you?

15 A. No.

16 Q. Okay. So would it be true then that R and W  
17 Cattle has not transferred any real property to you or  
18 an entity owned by you, as well?

19 A. I don't recognize it. I don't recall.

20 Q. Okay. Are you familiar with an entity or  
21 business association called Lake Powell Village at Lone  
22 Rock?

23 A. I have no recollection of it.

24 MS. MALONIS: I'll have this marked as  
25 Petitioner's 16 -- or 17; seventeen.

1 (Petitioner's Exhibit 17 marked.)

2 MS. HENNINGTON: Are you moving to admit  
3 it?

4 MS. MALONIS: Yes.

5 MS. HENNINGTON: Your Honor, it is my -- do  
6 you want to move to admit it?

7 MS. MALONIS: I'm sorry?

8 MS. HENNINGTON: Do you want to move to  
9 admit that?

10 MS. MALONIS: Yes.

11 MS. HENNINGTON: Your Honor, my objection  
12 is it's irrelevant. It's a quit claim deed dated in the  
13 end of 2002, which I -- I think I believe December of  
14 2002 by the pleadings of the parties, the separation  
15 didn't occur until the Spring of '03.

16 THE COURT: So why would it be admissible,  
17 Ms. Malonis?

18 MS. MALONIS: It's because -- I think it's  
19 important to know, to get a snapshot of what he had  
20 access to immediately before and how that changed  
21 immediately after.

22 THE COURT: It's admitted.

23 MS. MALONIS: Does the -- does the witness  
24 have the document?

25 THE COURT: Oh, I'm sorry.

1 MS. MALONIS: I thought the Court was still  
2 reviewing it. May I approach?

3 THE COURT: Yes, ma'am.

4 Q. (MS. MALONIS) If you'll look at the signature  
5 line there's a -- the -- is that your signature under  
6 Lone Powell Village of Lone Rock?

7 A. Appears to be, yes.

8 Q. Okay. Does that refresh your recollection at  
9 all?

10 A. I think it's talking about the same thing we  
11 spoke of awhile ago.

12 Q. Okay.

13 A. Lake Powell something.

14 Q. Okay. Was there more than one entity  
15 associated with Lake Powell?

16 A. No, I think it's the same thing.

17 Q. Okay. Do you -- what is that conveyance of  
18 real property that you have in front of you?

19 A. What is what?

20 Q. What is that conveyance of real property you  
21 have in front of you?

22 A. This was the condominiums that we talked about.

23 Q. I'm sorry?

24 A. If I remember correctly, it's the condominium  
25 that we talked about.

1 Q. Who's the conveyance from and who is it to?

2 A. It was to me and it was from -- I don't recall,  
3 but -- until I see it here.

4 Q. Well, if you -- is it your signature on both  
5 signature lines from the grantor and grantee?

6 A. You mean, like I sold it to myself?

7 Q. Or an entity you owned sold it to another  
8 entity you owned?

9 A. No.

10 Q. Okay.

11 A. Not to my recollection.

12 Q. Okay.

13 A. I don't know what this is. It's a quit claim  
14 deed.

15 Q. That's fine.

16 A. Okay.

17 MS. MALONIS: I'm going to have this marked  
18 as Exhibit 18.

19 (Petitioner's Exhibit 18 marked.)

20 MS. MALONIS: Petitioner offers Exhibit 18  
21 for admission.

22 MS. HENNINGTON: Your Honor, we're going to  
23 move to object to that. There's no seal on that. You  
24 can't tell a date or that it has a seal from the State  
25 of Texas or it's not properly authenticated. It's also

1 noted there's no date or anything to identify what this  
2 document is creating.

3 MS. MALONIS: It's -- it's got a -- it is  
4 called a Certificate of Formation, Limited Liability  
5 Company. It is a recorded instrument pursuant to -- by  
6 an agency who has a duty to record these instruments.  
7 It has a seal of the State of Texas. It has a filing  
8 number and -- and date, and unless there's -- unless  
9 there's a reason to challenge the reliability of the  
10 document....

11 MS. HENNINGTON: I -- I guess I'm used to  
12 Secretary of State documents having a signature or some  
13 kind of seal that identifies what they are. So this  
14 just looks like something downloaded from something, I  
15 guess that's my objection. The Judge can look at it and  
16 make that decision.

17 THE COURT: Okay. Are you asking him to  
18 identify this? Tell me what you're doing.

19 MS. MALONIS: I'm asking that it be  
20 admitted and if I need to -- if I need to get some  
21 testimony from respondent before admission I can do that  
22 as well. He -- he had previously testified that he  
23 hadn't formed or owned any company in Texas.

24 THE COURT: All right. Court will admit  
25 18, if you want to ask the witness about it.

1 MS. MALONIS: Yes.

2 Q. (MS. MALONIS) Mr. Jessop, do you recall me  
3 asking you about Alamo Assurance a little while ago?

4 A. Yes, I remember you asking.

5 Q. Okay. And if you'll review this document that  
6 is a Certificate of Formation of Limited Liability  
7 Company and the entity is Alamo Assurance. Does that  
8 refresh your recollection at all?

9 A. I don't recall. Could you tell me what it is?

10 Q. If you don't know, that's --

11 A. I'm sorry. I don't --

12 Q. I understand.

13 A. -- I don't recall it at all.

14 Q. And it says the manager is Fredrick Merril  
15 Jessop. Is there another Fredrick Merril Jessop? I  
16 understand that you're not familiar with this, but do  
17 you know of another Fredrick Merril Jessop?

18 A. I have a son by that name, yes.

19 Q. Okay. Is he a junior, Fredrick Merril?

20 A. Yes.

21 Q. Okay. Does your son Fredrick Merril Jessop Jr.  
22 live in Texas?

23 A. No.

24 Q. Okay. Do you have any involvement with the  
25 management of General Cooperative Association, Inc.?

1           A.    I don't know whether that is the mercantile or  
2 something different.  I think they're the same thing.  
3 I'm not certain how that's listed.

4                   MS. MALONIS:  Okay.  Let me have this  
5 marked as Petitioner's 19.

6                           (Petitioner's Exhibit 19 marked.)

7                   MS. MALONIS:  Petitioner moves to admit  
8 Exhibit 19.  It's a state of Arizona corporate  
9 commission nonprofit annual report and certificate of  
10 disclosure.

11                   MS. HENNINGTON:  Your Honor, we move -- we  
12 object to this because it looks like it's a print off on  
13 some type of web site, that it's not from the state of  
14 Arizona's web site; it's a copy of some document.  It  
15 looks like it's been scanned.

16                           Secondly, we -- we believe it would be  
17 irrelevant.  It's a document for -- it looks like  
18 might -- I can't tell if it's 1996 or 1998, based on the  
19 copy.  So we object to it as irrelevant and due to the  
20 time and fact that it's a scanned document.  It's been  
21 recopied.

22                   MS. MALONIS:  And I need -- I just need to  
23 ask.  I -- can I ask respondent if this refreshes his  
24 recollection about time periods and his involvement with  
25 this particular company?

1 THE COURT: Yes, you may ask that.

2 Q. (MS. MALONIS) This is a little bit difficult to  
3 read, but this is General Cooperative Association, Inc.,  
4 annual report. And on the second page, it's got you  
5 listed as -- as the president. And it's also got you  
6 listed as -- as a director. Do you see -- do you see  
7 where I'm pointing?

8 A. Yes, I see.

9 Q. Okay. And -- and reviewing the other names on  
10 there, and this document, generally, do you recall  
11 anything more about General Cooperative Association,  
12 Inc.?

13 A. Anything more?

14 Q. Yes. You didn't recall if that had to do with  
15 the mercantile. Do you recall anything more having  
16 looked at this?

17 A. Well, I think it's one in the same as I  
18 remember, not real certain.

19 What's the date here?

20 Q. This particular document is dated -- is for the  
21 year ending 1996. Do you know if you still are a  
22 director or officer of General Cooperative Association,  
23 Inc.?

24 A. I -- it seems to me like there was changes, but  
25 I -- I don't recall.

1 Q. Okay. And -- and it's your understanding that  
2 this is the same as Cooperative Mercantile?

3 A. Well, I -- I somehow thought so, but I -- I  
4 don't know how it's all put together.

5 Q. Okay. Are you familiar with the company by the  
6 name of General Supply?

7 A. There was a General Supply way back, early.

8 Q. Okay. Was that -- was General Supply a  
9 predecessor to any of the companies that we've talked  
10 about?

11 A. By predecessor, if you mean it was before, yes.

12 Q. Yes.

13 A. As I recall.

14 Q. Okay. Were you an officer or director or owner  
15 in General Supply?

16 MS. HENNINGTON: Again, Your Honor, I'm  
17 going to object as irrelevant. She asked a question.  
18 It was prior to all these other companies that were  
19 between 2002 and -- and now. So if it's prior to that,  
20 it wouldn't be relevant as to setting child support for  
21 a case that starts even in 2003 or 2009.

22 MS. MALONIS: Several of the companies we  
23 talked about are current, they're as of today, so....

24 THE COURT: See if you can be more clear.

25 MS. MALONIS: Okay. I will do that.

1 Q. (MS. MALONIS) Are -- do you know if General  
2 Supply ceased to be in existence prior to 2003 when --  
3 when petitioner left the community or was it still in  
4 existence, if you recall?

5 A. It seems like it was gone long before.

6 Q. Okay.

7 A. I don't have those dates.

8 Q. Okay. Are you familiar with a company called J  
9 and B Automotive?

10 A. Yes.

11 Q. And what was your association with J and B  
12 Automotive?

13 A. Similar to General Supply.

14 Q. It was General Supply?

15 A. Similar to it.

16 Q. Okay. What was your association? Were you an  
17 officer, director, did you have any control of it?

18 A. I had something to do with so many things. I  
19 just don't recall what position I had in it.

20 Q. Okay. And do you recall the time period that  
21 you were involved with J and B Automotive?

22 A. It would have been back at the same time as  
23 General Supply Company.

24 Q. Okay. Are you familiar with Colorado City  
25 Improvement Association?

1 A. Yes.

2 Q. And what is your connection with that or what  
3 was your connection with that if -- if you're no longer  
4 involved with that?

5 A. I was a member of the board is -- is all, as I  
6 remember.

7 Q. Okay. Are you still a member of the board?

8 A. I think that's a defunct thing.

9 Q. You think that's what?

10 A. Defunct. I haven't had anything to do with it  
11 for years.

12 Q. Okay. What did that association do?

13 A. Pardon me?

14 Q. What did that association do? What was its  
15 function, its business function?

16 A. I think it managed the United Ever Plan Lands.

17 Q. Do you recall who else was on the board of  
18 Colorado City Improvement Association?

19 MS. HENNINGTON: Your Honor, I'm going to  
20 object as irrelevant. He's already testified it has  
21 to do with the UEP lands managed by that. That is  
22 assets that have not been available, are not available  
23 currently to Mr. Jessop.

24 There is a court order out of Utah that has  
25 control of all of those assets and has since. I think

1 the litigation's been going on for years on that.

2 MS. MALONIS: I've beg to differ that UEP  
3 lands are not available. I think members of the  
4 community -- I believe Mr. Jessop has family living on  
5 UEP property at the moment. My reason for asking who  
6 else was on the board is I want to know the level of his  
7 involvement and if there was an ownership interest and  
8 what percentage.

9 THE COURT: Why don't you ask that  
10 question.

11 Q. (MS. MALONIS) Did you hear the question I just  
12 asked?

13 A. I didn't understand it, no.

14 Q. Okay. Did you -- what was your percentage  
15 ownership or involvement in Colorado City Improvement  
16 Association?

17 A. I had no ownership, only involved in sitting on  
18 the board.

19 Q. Okay. Did you have equal decision making  
20 authority with others?

21 A. Yes, I suppose so.

22 Q. Okay. Do you remember how many were in that  
23 group?

24 A. Hum, depends on which meeting you're talking  
25 about.

1 Q. I'll withdraw.

2 A. It seemed like six or eight, if I recall.

3 Q. Are you familiar with Twin City Improvement  
4 Association?

5 A. I've heard the name, yes.

6 Q. Okay. Do you know what that entity did?

7 A. I couldn't tell you what it did or what it is.

8 Q. All right. Are you involved in that any  
9 longer?

10 A. Excuse me, I don't think so.

11 Q. Okay. Do you know if that entity owned any  
12 property or had any assets?

13 A. Don't know.

14 Q. Did the Colorado City Improvement Association  
15 own anything or have any assets?

16 A. Not that I -- I think they just managed. I  
17 don't think they owned anything.

18 Q. Okay. Your company General Rock and Sand,  
19 before that went out of business, what -- since 2002,  
20 what equipment or other property did that company own?

21 A. It owned the -- some equipment. I -- I think  
22 it had some -- a couple of backhoes. It had a -- some  
23 cement mixer trucks, things of that nature.

24 Q. Okay. Was that company profitable for you when  
25 you were -- when you were running that business?

1           A.    I think if you looked at the tax record, it  
2 showed that we were coming.  But when I had that heart  
3 attack, it was ready to produce and roll, we felt like.  
4 But in my absence, it just went downhill.

5           Q.    Okay.  Did you -- did you ever make money from  
6 that?  Would you ever get benefits or make money from  
7 that enterprise?

8           A.    I had a paycheck is all.

9           Q.    Your paycheck?

10          A.    Uh-huh.

11          Q.    And how much was your paycheck?

12          A.    I think it was about fifteen hundred a month,  
13 as I recall --

14          Q.    Okay.

15          A.    -- back in those times.

16                    MS. MALONIS:  Can I have Exhibits 20 and 21  
17 marked.

18                    (Petitioner's Exhibit 20 and 21 marked.)

19                    MS. MALONIS:  Okay.  Petitioner offers 20  
20 and 21, the pleadings that were out of the Utah case.

21                    MS. HENNINGTON:  Your Honor, they appear to  
22 be -- and they're not certified, so I haven't seen them,  
23 but I don't have any reason to doubt that they are the  
24 responses to discovery produced by my client and for  
25 request for productions and interrogatories back in the

1 Utah case in '04, so no objection.

2 MS. MALONIS: That's correct.

3 THE COURT: Admitted. That's 20 and 21?

4 MS. MALONIS: Yes.

5 THE COURT: Okay. Do you want to question  
6 him from these?

7 MS. MALONIS: Yes. Yes, Your Honor.

8 THE COURT: All right.

9 MS. MALONIS: Thank you.

10 THE COURT: Uh-huh.

11 Q. (MS. MALONIS) Hand you 20 and 21. And do you  
12 recall being -- being given a request for production of  
13 documents and some interrogatories in the Utah child  
14 support case back in 2004, 2005? And if you need to  
15 take a minute to look through --

16 A. I -- I'd have to ask the attorney. I just  
17 don't --

18 Q. Okay.

19 A. -- recall.

20 Q. Well, let me ask you this.

21 A. I don't know.

22 Q. On Exhibit 21, on the last page, there's a  
23 verification. And it says in county Mohave, State of  
24 Arizona, Fredrick Merril Jessop, after first being duly  
25 sworn, says that he is the respondent herein, and he has

1 read the foregoing answers to interrogatories, knows and  
2 understands the contents thereof, that the same is true  
3 of his own knowledge and belief. And is that your  
4 signature?

5 A. Appears to be, yes.

6 Q. Okay. Dated June 20th, 2005?

7 A. Appears to be.

8 Q. Okay. And that's interrogatories. And on this  
9 other document, which is entitled response to request  
10 for production of documents, this is -- was Rodney  
11 Parker your attorney at the time?

12 A. Yes.

13 Q. Okay. And if you'll look at -- there's one I  
14 want you to turn your attention to. If you'll look at  
15 the documents attached to -- that were produced in  
16 response to that request.

17 A. Okay.

18 Q. And does this, the one that you're looking at,  
19 does it appear to be a 2003 individual tax -- income tax  
20 return?

21 A. Appears to be.

22 Q. Okay. Is that all -- okay. That document you  
23 just looked at, did that appear to be all one tax return  
24 or were there two in here? Oh --

25 A. It says 2003.

1 Q. Okay. So 2003 and 2004, two different returns?

2 A. It's two different years.

3 Q. Okay. And on -- and on 2003 your reported  
4 income was? Did you see where that is on here?

5 A. I can't read it.

6 Q. You reported \$835 as business income or loss;  
7 is that correct?

8 A. That's what it says, yes.

9 Q. Okay. And you see the date of this document?  
10 This is your 2003 income tax return dated 2/24/05.

11 A. Okay.

12 Q. Do you know why this would have been -- did you  
13 not file taxes for -- in 2003 and 2004 until -- well,  
14 2004 would have been due in 2005. But do you recall  
15 having filed this late?

16 A. I don't recall.

17 Q. Okay. Okay. Do you -- is any of your other --  
18 these entities we've talked about, where is income from  
19 those reported?

20 A. I don't know what you mean.

21 Q. Okay. Did you file any other tax returns other  
22 than this in 2003?

23 A. I don't recall doing any of it, myself, but --  
24 so I don't know.

25 Q. Okay. Okay. And in 2004 your reported wages

1 and salary income was zero; is that correct? Or that's  
2 what's on --

3 A. I can't read it. Is that a zero?

4 Q. It appears to be. Okay. Did you -- you had no  
5 income in 2004?

6 A. All I know is what this says.

7 Q. Okay. Well, did you have any income in 2004?

8 A. I -- I don't -- I don't recall dates and times.

9 Q. Okay. How -- how do you support yourself and  
10 your family and how have you supported yourself and your  
11 family since 2002?

12 A. Many of them work. And I have sons that --  
13 that work and have businesses.

14 Q. Okay. So do your sons help support you?

15 A. They support the family. They don't  
16 necessarily support me.

17 Q. You and your family. Which sons are those?

18 A. There's one right there in the courtroom.

19 Q. What's his name?

20 A. Dan.

21 Q. Okay. And what business does he have?

22 A. Construction.

23 Q. Okay. Do you know what his income is?

24 A. I do not.

25 Q. Do you know how much he contributes to you and

1 your family?

2 A. I -- I don't have those figures.

3 Q. How long has he contributed to you and your  
4 family?

5 A. Since the raid time.

6 Q. Since 2008?

7 A. 2008, yeah.

8 Q. Okay. And prior to 2008, how did -- who  
9 supported you and your family?

10 A. Who supported my family?

11 Q. You and your family.

12 A. Well, others, the boys.

13 Q. Okay. Which boys?

14 A. I have many of them. I -- Jim would have been  
15 one; Ernie would have been one; Joe would have been one;  
16 many others.

17 Q. Okay. What business does Jim have?

18 A. He just worked for a living.

19 Q. I'm sorry, can you say it again?

20 A. He -- he was in the, as I remember, in the  
21 concrete business.

22 Q. Okay. And do you -- how much support did he  
23 provide to you and your family?

24 A. I'm sorry, I just don't have all that.

25 Q. Okay. Ernie?

- 1 A. Didn't deal with me on it particularly.
- 2 Q. Who -- do you know who he would deal with?
- 3 A. Just one of the ladies.
- 4 Q. Okay. What about Ernie?
- 5 A. Same.
- 6 Q. Okay. He provided support?
- 7 A. Some.
- 8 Q. Prior to 2008?
- 9 A. Yes.
- 10 Q. Okay. What kind of business does he have?
- 11 A. What what?
- 12 Q. What kind of business does Ernie have?
- 13 A. I think he's in construction also.
- 14 Q. Are Jim and Dan and Ernie in business together?
- 15 A. No.
- 16 Q. Is it the same company?
- 17 A. No, they're all separate.
- 18 Q. Okay. And Joe?
- 19 A. Separate.
- 20 Q. And he provided support, as well?
- 21 A. Somewhere along the way they all --
- 22 Q. Okay.
- 23 A. -- as I understand, helped out, yes.
- 24 Q. Okay. And who -- who is providing support
- 25 currently.

1 A. Currently?

2 Q. Yes, sir.

3 A. The same people we're talking about.

4 Q. Joe, Ernie, Jim and Dan? Anyone else?

5 A. I'm sure there are, but I don't know when or  
6 where it happens.

7 Q. Okay. Does Raymond support you and your  
8 family?

9 A. Hasn't been.

10 Q. He has not been?

11 A. Hasn't been.

12 Q. Does Raymond live in Texas?

13 A. Pardon me?

14 MS. HENNINGTON: Your Honor, objection to  
15 relevance. He doesn't support this person.

16 THE COURT: Sustained.

17 MS. MALONIS: Thank you.

18 Q. (MS. MALONIS) Okay. So is that -- is that the  
19 extent of it, Dan, Jim, Ernie and Joe? Anyone else  
20 provide support for your family?

21 A. I'm sure there would be if the -- they sensed a  
22 need, yes.

23 Q. Okay. Has anyone else provided support?

24 A. Oh, they certainly have.

25 Q. Anyone else that you recall?

1           A.   Well, I would have to name them all off.  I  
2 don't know particularly who.

3           Q.   Okay.  Have any of these people who have  
4 provided support for you and your family provided  
5 support for the children that you have with petitioner?

6           A.   I don't think so.

7           Q.   Okay.  Have you asked them to?

8           A.   No.

9           Q.   Have you asked anyone for help to support your  
10 children?

11          A.   No.

12          Q.   Why have you not supported your children?

13          A.   Well, they had a nice home and everything  
14 provided and left that.  And that's all I could handle.

15                   MS. MALONIS:  May I pass the witness, and I  
16 may need to recall him at some other point, but that's  
17 all for now.

18                   THE COURT:  Ms. Hennington?

19                   MS. HENNINGTON:  I'm sorry?

20                   THE COURT:  She passed the witness.

21                   MS. HENNINGTON:  No questions of this  
22 witness, Judge.

23                                   \* \* \* \* \*

24

25