

AFFIDAVIT OF CUSTODIAN OF BUSINESS RECORDS

(C.R.E. 803(6) and 902(11))

I, Charles R. Bell, being of lawful age and first duly sworn, state as follows:

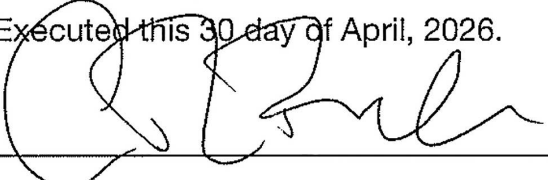
1. I am Charles R. Bell, the Petitioner in the above-captioned action. I am over the age of eighteen and competent to testify to the matters set forth in this Affidavit, all of which are within my personal knowledge.
2. At all times relevant to this Affidavit, I have been the sole owner and held one hundred percent (100%) of the membership interest in Tool Studios LLC, a Colorado limited liability company ("Tool Studios"). In that capacity, I am a custodian of records of Tool Studios and am familiar with the manner in which Tool Studios creates, maintains, stores, and relies upon its business records, including invoices received from third parties and records of payments made by Tool Studios in the ordinary course of its business.
3. Tool Studios regularly received and retained invoices and payment-related records for goods and services paid from Tool Studios funds or submitted to Tool Studios for payment, reimbursement, accounting, bookkeeping, or business-record purposes. Co-Petitioner Alyson Bell was a W-2 employee of Tool Studios and had access to Tool Studios devices and records during the relevant period. On July 14, 2023, at 9:19 PM, Carol Glassman, P.C., counsel of record for Co-Petitioner, stated in writing to Kathryn J. Goff, with Nelissa Milfeld and Co-Petitioner copied, that "[t]he money in Tool Studios is the only source of money to pay their bills" and that "[t]his has been the status quo throughout the marriage." I identify that communication because it bears on why Glassman billing records were maintained in Tool Studios records.
4. Attached hereto as Exhibit A is a true and correct copy of a compilation comprising the unredacted monthly invoices issued by Carol Glassman, P.C. to Alyson Bell, Client Code 1411.01, for periods ending December 31, 2022, January 31, 2023, February 28, 2023, March 31, 2023, April 30, 2023, May 31, 2023, and June 30, 2023 (collectively, the "Unredacted Glassman Invoices").

5. The Unredacted Glassman Invoices were created by Carol Glassman, P.C. and transmitted to or maintained within Tool Studios records during the relevant period. Tool Studios did not create the invoices. Tool Studios received, stored, and maintained the invoices as records relating to payment, accounting, bookkeeping, or business financial activity. To the extent this affidavit authenticates the invoices under C.R.E. 803(6) and 902(11), it authenticates the copy maintained in Tool Studios records, the manner in which Tool Studios received and preserved the records, and the fact that the records were kept in Tool Studios' ordinary course of business. I do not purport to authenticate Carol Glassman, P.C.'s internal billing system.
6. The Unredacted Glassman Invoices attached as Exhibit A were recovered from an archived backup of a Tool Studios company-owned device used by Alyson Bell during her employment as a W-2 employee of Tool Studios. The backup is part of Tool Studios' routine information-technology preservation practices. The Unredacted Glassman Invoices have been maintained without alteration since the time of recovery, and the file metadata of each invoice has been preserved.
7. I have personally compared the Unredacted Glassman Invoices to the cumulative "Historical Statements" composite produced by Co-Petitioner on August 1, 2023, under cover of the Co-Petitioner's sworn Response to Petitioner's Pattern and Non-Pattern Requests for Production of Documents (Filing ID 2113CA895D170), via Dropbox link (Folder: "BELL: C-P'S SUPPORTING DOCS TO RFP OF DOCS TO O.C."), and to Exhibit III filed at trial on August 21, 2023, at 10:40 AM (Filing ID FED53E8356F6C). The Unredacted Glassman Invoices contain narrative entries, vendor cost-line descriptions, and payment information that have been redacted in both the August 1, 2023 produced version and the August 21, 2023 filed Exhibit III.
8. The Unredacted Glassman Invoices attached as Exhibit A are offered as records maintained by Tool Studios in the ordinary course of its business, pursuant to C.R.E. 803(6), and as self-authenticating records of regularly conducted activity pursuant to C.R.E. 902(11), limited to Tool Studios' receipt, custody, preservation, and use of the records. This affidavit does not purport to authenticate the internal billing practices, time-entry practices, or accounting system of Carol Glassman, P.C.

DECLARATION

I, Charles R. Bell, declare under penalty of perjury under the laws of the State of Colorado that the foregoing is true and correct, on personal knowledge.

Executed this 30 day of April, 2026.



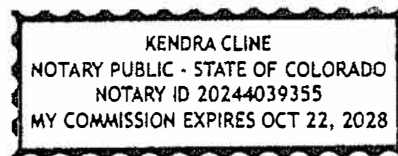
/s/Charles R. Bell

Managing Member, Tool Studios LLC

Subscribed and sworn to before me this 30 day of April, 2026.



Notary Public



My Commission Expires: October 22, 2028