



**A. Expert Witnesses:**

1. Jeremy Harkness, CPA/ABV, Director, Causey Demgen & Moore, P.C., 1099 Eighteenth St., Suite 2300, Denver, CO 80202. (303) 296-2229. [jharkness@causeycpas.com](mailto:jharkness@causeycpas.com). Mr. Harkness was retained as the parties' joint accounting expert to value Petitioner's 100% ownership interest in Tool Studios, LLC and to render opinions regarding each party's income. Mr. Harkness will testify and render opinions regarding the value of the investment value and fair market value of Charles Bell's 100% ownership interest as of February 28, 2023 and April 30, 2023 of Tool Studios, LLC consistent with the opinions expressed in his valuation reports dated February 28, 2023 and April 30, 2023. Mr. Harkness will also testify and render opinions as to Petitioner's and Co-Petitioner's incomes in 2021 and 2022. Mr. Harkness will further testify regarding any issue that is within the scope of his engagement that is relevant to these proceedings. Qualifications of this expert witness, including a list of all publications authored by the witness in the preceding ten years and any other cases in which the witness has testified as an expert in trial or by deposition within the last four years, is attached as Exhibit 1. Mr. Harkness' reports were produced to counsel on March 28, 2023, May 4, 2023 and May 17, 2023.

2. Glenn Fleckenstein, Hammond Appraisals, 1890 Birch Street, Broomfield, CO 80020. 303-439-7447; [glenn@hammondappraisals.com](mailto:glenn@hammondappraisals.com). Mr. Fleckenstein was retained as the joint expert to appraise and render opinions regarding the value of the property located at 7210 Timothy Place, Niwot, CO. Qualifications of this expert were provided to both counsel. Mr. Fleckenstein's appraisal as of February 10, 2023 was provided to both counsel on February 22, 2023.

3. Jay Freedberg, CPA/ABV/CFF, CVA, Six Consulting, 275 Century Circle, Suite 200, Louisville, CO 80027 (303) 652-5027. Mr. Freedberg was retained by Petitioner as a sole valuation and accounting expert to perform an analysis of Charles Bell's ownership interest in Tool Studios, LLC and Charles Bell's income and Alyson Bell's income from 2018-2022 based upon the Parties' income tax filings, Tool Studios, LLC Form 1041 tax returns, the income analysis prepared by joint expert, Jeremy Harkness, CPA, and the business valuation of Tool Studios, LLC by joint expert, Jeremy Harkness, CPA. Mr. Freedberg will render rebuttal opinions regarding each parties' income based upon his calculations in accordance with the Colorado Revised Statutes definitions of income and may render a rebuttal opinion regarding the value of Charles Bell's 100% ownership interest in Tool Studios, LLC. Mr. Freedberg will also testify as to any issue that is within the scope of his engagement that is relevant to these proceedings to which Mr. Freedberg has personal knowledge. Qualifications of this expert witness, including a list of all publications authored by the witness in the preceding ten years and any other cases in which the witness has testified as an expert in trial or by deposition within the last four years is attached as Exhibit 2. Mr. Freedberg's rebuttal reports shall be produced on or before July 17, 2023.

4. Any expert endorsed by Petitioner may be called as an adverse witness.

5. Any other expert necessary to rebut evidence presented by Petitioner.

6. Co-Petitioner may call any expert witness identified by the other party (even if such witness is later withdrawn) or any other expert witness not known at this time but necessary to prevent manifest injustice.

**B. Non-Retained Expert Witnesses:**

1. Jill Reiter, LCSW, PLLC, 750 E. 9<sup>th</sup> Avenue, Suite 104, Denver, CO 80203. (720) 810-9910. Ms. Reiter was retained by the parties as a reunification therapist to address the family dynamics affecting the relationship between Petitioner and the parties' minor child, Hudson (Camryn) Bell. Ms. Reiter may testify about reunification therapy which shall include, without limitation, her opinions regarding the emotional status of the parties and the child, her observations of both parties, her observations of the child, her observations and description of the family dynamic, her communications with the parties, each party's participation in the process, and her opinions about the progress of the reunification therapy to date, and any other issue that is relevant to the reunification therapy to which Ms. Reiter has personal knowledge.

2. Patricia R. Murphy and/or Tara Little of the Niwot Group at Compass, 7915 Niwot Road, Niwot, CO 80503. (303) 652-2626. Ms. Murphy and/or Ms. Little were contacted by Co-Petitioner as a potential Listing Agent for the property located at 7210 Timothy Place, Niwot, CO. This witness may testify regarding the value of the marital home based upon this witness's experience and knowledge of Boulder County real estate based upon comparable properties, recent sales, and market trends. This witness may also render opinions regarding her expectations of the time frame between listing and sale and recommended fix-up expenses to prepare the residence for sale.

3. Any other expert necessary to rebut evidence presented by Petitioner.

4. Any expert endorsed by Petitioner may be called as an adverse witness.

**C. Lay Witnesses:**

A Parenting Plan is being circulated for signatures and Co-Petitioner anticipates that a Parenting Plan will be submitted to the Court. As such, at this time, Co-Petitioner lists no lay witnesses on parenting issues, other than the parties, but reserves her right to supplement this Witness Disclosure, if necessary.

1. Petitioner, Charles Bell, c/o Kathryn Goff, Goff and Goff LLC, 6800 N. 79th Street, Suite 206 Niwot, CO. The Petitioner may be called as an adverse witness to testify regarding any and all aspects of this case.

2. Co-Petitioner, Alyson Bell, c/o Carol .Glassman, Carol Glassman, P.C., 1790 38<sup>th</sup> Street, Suite 300, Boulder, CO 80301. (303) 442-1403. The Co-Petitioner may be called as a witness to testify regarding any and all aspects of this case.

3. Any witness endorsed by the Petitioner may be called as an adverse witness.

4. Any witness necessary for impeachment or rebuttal.

5. Any witness necessary for foundation and authentication purposes.

6. Although Co-Petitioner's counsel would hope that the parties can stipulate to the admission of documents related to account balances, income, assets, etc., Co-Petitioner may call any witnesses necessary to authenticate any evidence or documents if said agreement is not reached. These documents would include, but are not limited to, credit card statements, bank statements, income statements, cancelled checks, Blue Book values for vehicles, health insurance premiums, tax returns, pay stubs and the like.

7. Co-Petitioner reserves the right to endorse any additional expert or lay witnesses as they become known to either party in this matter.

Dated: June 16, 2023.

Respectfully submitted,

CAROL GLASSMAN, P.C.

/s/Carol Glassman

Carol Glassman, No. 11321

### **CERTIFICATE OF SERVICE**

I hereby certify that on the 16<sup>th</sup> day of June, 2023, a true and correct copy of the foregoing document was filed electronically with the Court and electronically served by Colorado Courts E-Filing and addressed to:

Kathryn J. Goff  
[katie@goff-law.com](mailto:katie@goff-law.com)

/s/ Michele LaPlume

Michele LaPlume