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Bell

v.

Bell

Charles Bell

July 06, 2023



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<p align="right">Page 1</p> <p>DISTRICT COURT BOULDER COUNTY, COLORADO 20th Judicial District Court Boulder County Justice Center 1777 Sixth Street, PO Box 4249 Boulder, Colorado 80306 303-441-3750</p> <p align="center">----- DEPOSITION OF CHARLES BELL July 6, 2023 -----</p> <p>In re the Marriage of: Case No. 2022DR30458</p> <p>Charles Bell, Petitioner, and Alyson Bell, Co-Petitioner.</p> <p>----- APPEARANCES: MILFELD LAW, LLC By Nelissa Milfeld, Esquire 1650 38th Street, Suite 203E Boulder, Colorado 80301 milfeldlaw@gmail.com On behalf of Alyson Bell. CAROL GLASSMAN, PC By Carol Glassman, Esquire 1790 38th Street, Suite 300 Boulder, Colorado 80301 carol@carolglassman.com On behalf of Alyson Bell. GOFF & GOFF, LLC By Kathryn Goff, Esquire 6800 North 79th Street, Suite 206 Niwot, Colorado 80503-8979 On behalf of Charles Bell.</p>	<p align="right">Page 2</p> <p>1 Pursuant to Notice, the Deposition of CHARLES BELL, called 2 by the Co-Petitioner, taken on July 6, 2023, commencing at 3 9:02 AM Mountain Time at 1790 38th Street, Suite 300, 4 Boulder, Colorado, before Annie Sager, Court Reporter and 5 Notary Public within and for the State of Colorado. 6 7 I N D E X 8 DEPOSITION OF CHARLES BELL 9 EXAMINATION 10 Examination by Ms. Milfeld: 3 11 EXHIBITS 12 Exhibit 1 Valuation Engagement 34 13 Exhibit 2 Historical Balance Sheets 36 14 Exhibit 3 Letter to Glassman & Pierce 64 15 Exhibit 4 E-mail from Charles Bell 94 16 Exhibit 5 Spreadsheet 146 17 Exhibit 6 Disclosures 164 18 Exhibit 7 Summary Appraisal Report 183 19 Exhibit 8 Sworn Financial Statement 184 20 Exhibit 9 E-mail from Bell 205 21 22 23 24 25</p>
<p align="right">Page 3</p> <p>1 P R O C E E D I N G S 2 (WHEREUPON, the oath was administered by 3 the court reporter.) 4 CHARLES BELL, 5 a witness in the above-entitled proceedings, 6 after having been first duly sworn, 7 testified under oath as follows: 8 EXAMINATION 9 BY MS. MILFELD: 10 Q Mr. Bell, please say your name and spell your last 11 name for the record. 12 A Charles Robert Bell, B-E-L-L. 13 Q For today would you like for me to call you 14 Charles, Mr. Bell or something else? 15 A Charlie is fine. 16 Q How old are you, Charlie? 17 A 61. 18 Q What is your current address? 19 A 7210 Timothy Place, Niwot, Colorado, 80503. 20 Q How long have you lived at 7210 Timothy Place? 21 A I'm not sure. 13 years, I think. 12 or 13 years. 22 Q I would like to tell you a few things about the 23 deposition. I am going to go through a series of 24 questions, and I need for you to give me an 25 audible answer.</p>	<p align="right">Page 4</p> <p>1 Do you understand that? 2 A Oh, you mean like not nod? 3 Q Yes. 4 A Got it. 5 Q So I don't want you to nod just because the 6 reporter is -- 7 A I get it. 8 Q -- taking notes. 9 And if you could not interrupt me and wait 10 until I finish either a question or if I'm talking 11 just wait until the end, do you agree to do that? 12 A Sure. 13 Q I'm not here to trick you, but to get more 14 information. If you do not understand a question, 15 please ask me. 16 A Okay. 17 Q We can take a break at any time. I just ask that 18 you do not take a break between when I ask a 19 question and when you're supposed to answer. 20 A Okay. 21 Q Are you under the influence of any medications or 22 drugs that would prohibit you from understanding 23 and responding to my questions? 24 A No. 25 Q Is there any other reason that would prevent you</p>

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<p style="text-align: right;">Page 5</p> <p>1 from understanding and answering my questions?</p> <p>2 A No.</p> <p>3 Q Do you have difficulty comprehending written</p> <p>4 documents for any reason?</p> <p>5 A No.</p> <p>6 Q Why did you just pause there?</p> <p>7 A I just wanted to make sure I thought through that.</p> <p>8 Like I said, I was thinking. I'm dyslexic, but I</p> <p>9 don't have problems reading documents, so that's</p> <p>10 the only reason.</p> <p>11 Q How long have you been dyslexic for?</p> <p>12 A My whole life.</p> <p>13 Q When were you first diagnosed?</p> <p>14 A Young. High school probably, maybe a little</p> <p>15 before.</p> <p>16 Q Do you remember who diagnosed you with dyslexia?</p> <p>17 A No, I don't, to be honest with you.</p> <p>18 Q How does dyslexia affect your everyday life?</p> <p>19 A It doesn't, I don't think. You know, I mean, it's</p> <p>20 just communication. You know, I'm ADHD as well so</p> <p>21 communication sometimes I'm to the point.</p> <p>22 You know, what comes across, you know, as</p> <p>23 one thing might be perceived as another, and so</p> <p>24 that's always been a challenge and why I don't</p> <p>25 like, you know, typing and communicating via</p>	<p style="text-align: right;">Page 6</p> <p>1 texting and e-mails and it has always been, you</p> <p>2 know, something that I try not to do as much. I</p> <p>3 am a much better communicator verbally than</p> <p>4 written, and I think we all know that the written</p> <p>5 word is sometimes misconstrued, if that makes</p> <p>6 sense.</p> <p>7 Q Why do you have trouble with the written word as</p> <p>8 opposed to communicating in person?</p> <p>9 A I mean, it's just cognitive neurological</p> <p>10 challenges, you know, with somebody with ADHD. I</p> <p>11 mean, I can go into the neurological level of it.</p> <p>12 You know what I mean? You can research it on your</p> <p>13 own and you'll find plenty of articles and</p> <p>14 information with regards to communication with</p> <p>15 somebody with ADHD, but I get around it.</p> <p>16 I am now starting to use AI which has been</p> <p>17 incredible and helpful for me. It allows me to</p> <p>18 take words and tell things like make sure that you</p> <p>19 remove any adversarial comments or any, you know,</p> <p>20 like emotional things through it. You know what I</p> <p>21 mean? Because I've been accused from my wife of</p> <p>22 sending something and being totally misunderstood,</p> <p>23 and so AI allows me to do that a lot better than</p> <p>24 in the past which I'm grateful for.</p> <p>25 Q When you say that your wife has accused you of</p>
<p style="text-align: right;">Page 7</p> <p>1 things, give me an example of that.</p> <p>2 A Well, I'll text something, you know, and it's like</p> <p>3 you're being hurtful or -- I'm trying to think of</p> <p>4 some real specific examples, but like I said, I</p> <p>5 get directly to the point, and if you understand</p> <p>6 the ADHD brain, it rapid fires, right, and it can</p> <p>7 process, you know, 10,000 to your one, if that</p> <p>8 makes sense.</p> <p>9 And sometimes when I write something down I</p> <p>10 might have ten answers or ten options, right, and</p> <p>11 what I do for a living as a creative director is</p> <p>12 that I solve problems and I can perceive all the</p> <p>13 different angles, all the different solutions and</p> <p>14 that sometimes like I said it's -- I'm trying to</p> <p>15 answer your question, but it's a very complex</p> <p>16 answer, if that makes sense.</p> <p>17 Q When you say your wife has accused you of things,</p> <p>18 for example, saying that was hurtful, is that what</p> <p>19 you consider an accusation, someone expressing how</p> <p>20 they feel?</p> <p>21 A Yeah. I mean, if somebody says, oh, you were</p> <p>22 nasty in that e-mail, and I say, oh, look, I see</p> <p>23 how that could have been perceived that way. I'm</p> <p>24 sorry. Let me reword it. That's the scenario.</p> <p>25 So if that's an accusation, then that's fine.</p>	<p style="text-align: right;">Page 8</p> <p>1 Q Would you consider yourself a good problem-solver?</p> <p>2 A Yeah, extremely good.</p> <p>3 Q How so?</p> <p>4 A Like I just explained, I can take a problem and</p> <p>5 process it as good as anybody and come up with 101</p> <p>6 solutions.</p> <p>7 Q Why haven't you been able to solve this case or</p> <p>8 resolve it?</p> <p>9 A Because of my wife's complex PTSD.</p> <p>10 Q What do you mean by that?</p> <p>11 A Again, it's my -- again, I'll tell you. It's</p> <p>12 definitely a subjective opinion.</p> <p>13 Q What does complex PTSD mean to you?</p> <p>14 A I mean, I know -- I'm just wanting to answer this</p> <p>15 question clearly. I have it documented. I can</p> <p>16 provide documentation for the scenario that I feel</p> <p>17 like we are dealing with when you ask that</p> <p>18 question why I haven't solved this case. I have</p> <p>19 the answers for that in documents, and I would be</p> <p>20 glad to provide that to you guys eventually.</p> <p>21 Q Well, now we're talking about you believing that</p> <p>22 your wife has complex PTSD.</p> <p>23 What does that phrase mean to you?</p> <p>24 A What does that mean to you? It's that you have</p> <p>25 unresolved trauma of your past, and in Allie's</p>

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<p style="text-align: right;">Page 9</p> <p>1 case we have been trying to deal with it for 2 five years, and in that scenario you're trying to 3 bring up repressed, you know, assaults that 4 happened as a child, and what happens with 5 unresolved trauma in a family dynamic and in a 6 personal dynamic is that the earlier the trauma 7 occurred, the more difficult it is for somebody 8 neurologically to understand it and to understand 9 its affects.</p> <p>10 A simple example is Allie will get -- you 11 know, recently came in the backyard, was angry at 12 me, made some snide comments, and I tried to be 13 really calm with her and I'm like, Allie, I put 14 gas in the tank. I don't know what you're talking 15 about, blah, blah, blah.</p> <p>16 She moves on, whatever, and then we talk 17 about it later, and she has a totally different 18 observation of it, and that can be explained based 19 on the principles of PTSD and trauma. And so if 20 you really think about it, I'm going to give this 21 to you in simple terms.</p> <p>22 What Allie and I have worked on for years 23 is that she came to me several years ago and had 24 flashbacks about sexual assault as a child. She 25 was raised from the age of 5 to 17 by a very</p>	<p style="text-align: right;">Page 10</p> <p>1 aggressively abusive mother and a father that was 2 a pedophile.</p> <p>3 So if you have something like that occur at 4 the age of let's say 5 or 6 or 7, right, you 5 establish coping mechanisms, right, to deal with 6 those situations. You shut out the world, right? 7 And when you shut out the world, you then 8 start to control your environment and you start to 9 establish these incredible coping skills, and this 10 is where the term "survivor" comes into play, but 11 you create these coping skills that you then carry 12 forth into your adult life.</p> <p>13 And what makes it very difficult is that 14 you have mixed realities, right? You see things 15 and you're always guarded. You know, you've heard 16 fight, flight or freeze, and that's been our life.</p> <p>17 It's either Allie freezes, she fights back 18 or she runs. And what led to this problem was we 19 were in very intense therapy 48 hours before she 20 fled and froze like a child in this session when 21 confronted about her emotions.</p> <p>22 She then didn't even remember. I had to 23 leave because it was the worst I had ever seen at 24 that point, and she just -- it just was over, and 25 she was really heavily drinking that whole week</p>
<p style="text-align: right;">Page 11</p> <p>1 before knowing that these sessions -- and this is 2 all stuff that's documented. She's been arrested 3 for belligerent behavior while drinking. The 4 spite thing in her is just really dysfunctional.</p> <p>5 Look, I just got that e-mail from you about 6 a chat I had with Camryn, and there was so much 7 miscommunication, and my guess is you probably 8 never even saw that text.</p> <p>9 I asked her to share it with you, and so 10 that's why. It's like there's always this 11 guarded, you know, elimination.</p> <p>12 And unfortunately what -- at least the 13 specialist that I've been consulting with for the 14 last five months to try to understand all this and 15 make the right chess moves to try to resolve it, 16 you know, is that I have become the perpetrator to 17 her, and it's fairly complex.</p> <p>18 There is some great books on it. There's a 19 great doctor out in the Boston area that can speak 20 obviously a lot more clearly to the problem, but 21 for all intents and purposes it doesn't matter 22 what I say or do.</p> <p>23 She will mix it and come back with 24 something else that in many, many cases are just 25 pure lies, but she believes them, and that's what</p>	<p style="text-align: right;">Page 12</p> <p>1 makes it so difficult. So she will lie, but she 2 absolutely believes that she's not lying, and I 3 have several examples of that.</p> <p>4 Q What's an example of that?</p> <p>5 A I sent an e-mail to her in the Talking Parent app 6 and I said, hey, look, I just found these really 7 great articles about ADHD and all sorts of stuff 8 like that and I think it's worth us -- I think 9 it's worth us having that looked at by their 10 therapist, right?</p> <p>11 Then she texted one of her best friends and 12 said Charles thinks ADHD causes transgender. 13 We've had two psychiatrists evaluate Camryn, and 14 neither of them ever found anything to do with 15 ADHD.</p> <p>16 And then I was like, god, that can't be 17 true, and I went back and there was the -- I 18 talked to the doctor that did the first evaluation 19 and he said absolutely there was ADHD tendencies, 20 and I talked to the second psychiatrist and she 21 said, you know, it's possible for sure and 22 especially in a father that has ADHD it's most 23 likely to have one in three, but Allie is so 24 protective. She's like no, no, no.</p> <p>25 Q So help me understand --</p>

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1 A I'm sorry. It's complex.
 2 MS. GOFF: Charlie, why don't you just
 3 answer the question.
 4 A Well, she asked a very difficult question.
 5 BY MS. MILFELD:
 6 Q **Help me understand what the lie is.**
 7 A What the lie is?
 8 Q **You said you were giving an example of --**
 9 A Okay, okay, one lie. She told one of our friends
 10 that I felt that ADHD caused her to be
 11 transgender, caused my son to be transgender.
 12 Never said it. Lie. Okay?
 13 She said another lie. She said that
 14 neither psychiatrist that had done the evaluation
 15 which was actually not two psychiatrists, it was
 16 one psychiatrist and one nurse practitioner. The
 17 first psychiatrist did find tendencies of ADHD.
 18 She said neither ever did. There's a good
 19 example.
 20 Q **How has Alyson's PTSD interfered with --**
 21 A Presumed PTSD. I'm not a doctor.
 22 Q **Hold on. Hold on. Hold on.**
 23 A I'm sorry.
 24 Q **I wasn't done with the question.**
 25 A Okay. Go ahead.

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1 and hold Allie accountable to it.
 2 MS. GOFF: So let's talk about this.
 3 THE WITNESS: Okay.
 4 MS. MILFELD: Hold on a minute. Do you
 5 want to talk to him privately?
 6 MS. GOFF: I want to talk to you. I
 7 want to say something about this deposition and
 8 I want to say something about going into
 9 parenting stuff because we've got a plan signed,
 10 we've got reunification on the table, we have
 11 three attorneys here sitting and getting paid,
 12 and I think that we need to not talk about the
 13 parenting plan. We have an agreement.
 14 MS. MILFELD: Well, we don't have a
 15 parenting schedule is the problem because --
 16 MS. GOFF: We do have a parenting
 17 schedule because Camryn is in reunification
 18 therapy with Charlie, and she hasn't come up
 19 with a schedule yet, but she may.
 20 THE WITNESS: Yeah, we're working on it.
 21 MS. GOFF: And we're working on it.
 22 THE WITNESS: You know, we all agreed
 23 that she would help guide that.
 24 MS. GOFF: Right. It's in the
 25 agreement.

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1 Q **How has Alyson's complex PTSD interfered with**
 2 **divorce solutions?**
 3 A I mean, everything from falsifying documentation
 4 to, you know, telling people one thing and it
 5 being something totally different to everyday
 6 decisions with the kids. Do you know what I mean?
 7 Hey Allie, Cam is watching their phone over
 8 ten hours a day. We need to do something about
 9 it. Whatever, they have plenty on their plate.
 10 Okay. You know? So just decisions about the
 11 children. You know what I mean? Like I said, I
 12 have notes and probably could give you more
 13 information, more specifics.
 14 Q **Didn't you just sign a parenting plan?**
 15 A Yep, which I'm grateful for. You know what I
 16 mean? It was great, and we got reunification in
 17 place which is even greater, so I wanted the --
 18 what's it called, the thing, PRE, yeah.
 19 I wanted the PRE, but got a lot of pressure
 20 from my family not to force that, and then I think
 21 you guys suggested reunification, and I read the
 22 documentation, I read Carol's bios, I read all her
 23 contracts, and I realized that she would be able
 24 to accomplish the same thing which would be to
 25 identify the issue and bring it to the forefront

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1 MS. MILFELD: Well, your client started
 2 talking about this.
 3 THE WITNESS: You asked me a question.
 4 I don't mind, like I said, but I hear what Carol
 5 is saying too.
 6 BY MS. MILFELD:
 7 Q **Why has Alyson's complex PTSD prevented you from**
 8 **figuring out a property division? Because you**
 9 **have given a lot of examples of interference with**
 10 **decisions with Camryn, but I haven't heard**
 11 **anything of how this would impact you coming up**
 12 **with a solution about how to divide the property**
 13 **in this case.**
 14 A No, I think we're close. I was just working on it
 15 last night. You know, I think we are very close
 16 on the property.
 17 The problem is when we got the original
 18 proposal, and that's why I wanted it to come from
 19 Alyson first before I ever offered anything
 20 because I needed to see her mindset.
 21 I needed to understand the numbers and
 22 where she was thinking and how she created those
 23 numbers in her head, and I figured that finally
 24 out, and so now we are just trying to counter with
 25 realistic numbers, but her track-record is that

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1 she refuses everything and she creates whatever
 2 scenario serves her, and that's fine. I just want
 3 to deal with facts, so we'll get there.

4 **Q Did you have difficulty understanding her proposal**
 5 **at mediation?**

6 A No. You know, I did not. I understood it very
 7 clearly.

8 **Q Then help me understand why you had difficulty**
 9 **figuring out the numbers.**

10 A I didn't have any difficulty figuring out the
 11 numbers at all. I don't know. Can you give me an
 12 example?

13 I saw the numbers. I just didn't agree
 14 with them, and I didn't agree with how they were
 15 accumulated, and at the last minute you guys were
 16 trying to changes numbers on us. And all I can
 17 tell you is that, you know, when she is paying off
 18 personal creditcards from the business that have
 19 alcohol, massages and all that stuff and trying to
 20 hide it from me and not giving me access to those
 21 cards and last minute giving me statements, it's a
 22 mess.

23 **Q What last minute changes are you talking about?**

24 A I think related to these personal creditcards
 25 being paid off or this \$30,000 that she tried to

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1 A I own the company.

2 **Q Who makes the business decisions in your company?**

3 A I do.

4 **Q Do you have access to the books at your company?**

5 A Uh-huh.

6 **Q Why don't you just hire someone to look at the**
 7 **books? Why do you need Alyson to help you with**
 8 **this?**

9 A I was told I can't do that.

10 **Q Who told you that?**

11 A My attorneys in the past and you guys. It was
 12 supposed to be status quo, and Allie made it very
 13 clear in writing that I was not to hire an
 14 executive coach for myself.

15 It was not okay for me to hire an outside
 16 accountant to look at the books or to touch the
 17 books. But yeah, could I? And I will. I mean,
 18 look, if you guys are good with that I will do
 19 that. I have somebody ready to go, and I will
 20 lock her out and I will get it fixed.

21 **Q So you're saying that your previous attorneys told**
 22 **you that you as a business owner could not hire**
 23 **someone to look at your own books? Is that what**
 24 **you're saying?**

25 A Well, no, it absolutely is what I'm saying and why

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1 tag onto my salary. I just didn't understand it,
 2 so it was just crazy stuff. And like I said,
 3 Jeremy, our books are a fucking mess, and I have
 4 been trying to get them cleaned up, and she has
 5 refused.

6 **Q Why haven't you been able to respond to Alyson's**
 7 **offer to divide property?**

8 A I'm working on it, like I said. Again, it's
 9 complicated. In my opinion, I don't want to say
 10 it's highly complicated, but it's something that
 11 I'm working on, you know.

12 **Q What is so complicated about it?**

13 A Like I said, it's understanding -- okay. In
 14 simple terms, I have no way of understanding what
 15 the company is paying for and what Allie is using
 16 the company to pay for personal expenses. That's
 17 the problem.

18 And I have been trying and she has refused
 19 to help and have anybody go into the books to help
 20 her clean it up. I have asked several times and
 21 even hired two people and even gave her clear
 22 direction on how to do it, but she doesn't want to
 23 because as soon as -- I don't know why. I mean, I
 24 do know why, but that's another story.

25 **Q Who owns the company?**

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1 is because Allie has been the bookkeeper. When
 2 she left she said, "I am going to continue to work
 3 for the company and continue to do the books, and
 4 we are supposed to keep everything status quo."
 5 And prior to that I have been trying to work on
 6 getting her help to do the books for a long time.

7 **Q You technically are Allie or Alyson's boss, right?**

8 A No. We started the company together. The only
 9 reason it's all in my name is because she had a
 10 bankruptcy from her first marriage and we couldn't
 11 put it in both our names, but I can tell you
 12 three years ago and I'm waiting for Biff Warren,
 13 but Allie happily -- we had a document signed that
 14 stated very clearly that she was entitled to the
 15 company, half the company.

16 So again, I don't know what to tell you. I
 17 mean, we started the company together. She was
 18 the account executive. She was the bookkeeper.
 19 She was -- you know, she managed the people when
 20 we had employees and all that kind of stuff, and
 21 over the years, you know, she has slowly slid away
 22 from the company and just stuck to the books and,
 23 you know, I have tried to give her more work, but
 24 she refused. You know, now I don't know what to
 25 tell you.

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<p style="text-align: right;">Page 21</p> <p>1 Q You said something about Jeremy saying the books 2 were a mess. 3 A Yep. 4 Q What do you mean by that? 5 A Just that, like I said. 6 Q By "Jeremy" are you referring to Jeremy Harkness? 7 A Yeah. Yeah. 8 Q When did Mr. Harkness tell you that? 9 A Oh, he's told me that several times in our 10 conversations. 11 Q Were these conversations over the phone or by text 12 or -- 13 A Yeah, over the phone. 14 Q If you could just wait until I finish the question 15 for the court reporter. 16 A Sure. I'm sorry. 17 Q So let's go back. 18 A I'm sorry. 19 Q When Jeremy told you that the books were a mess 20 did he tell you over the phone, text, e-mail, in 21 person? 22 A Over the phone. We never met in person. 23 Q He told you how many times that the books were a 24 mess over the phone? 25 A Every time there was a needed adjustment to</p>	<p style="text-align: right;">Page 22</p> <p>1 something and every time I pointed out something 2 to him, you know. Again, he'll testify to it, I'm 3 sure. 4 Q Did he use the phrase "a mess"? 5 A Yes. 6 Q Did he use any other words to describe the books 7 that you can think of? 8 A Let me think about this. What he said to me right 9 before mediation was, Charlie, it came down to the 10 money in the bank and \$15,000. If you spend money 11 out of the bank account, it will decrease its 12 value by that amount. You don't need to keep 13 paying me to adjust the books. And that was very 14 clear what he said to me. 15 Q So from that comment you are interpreting that he 16 said the books were a mess? 17 A No, that was a different comment. You said was 18 there other comments that he made. 19 Q Okay. 20 A That was the other comment he made. 21 Q Okay. How many times did you speak with 22 Mr. Harkness? 23 A Half dozen. 24 Q When you spoke with him was it all over the phone? 25 A Yep.</p>
<p style="text-align: right;">Page 23</p> <p>1 Q Did you ever have communications with him by 2 e-mail or text message? 3 A Probably. I mean, I can look if you want me to, 4 but basically he did the initial interview and I 5 was explaining to him, you know, the troubles with 6 the books that I have been trying to address. 7 I explained to him, you know, the 2020 year 8 that was this incredible year that wiped out our 9 debt and put all the money in the bank, and I 10 explained to him, you know, P&L's. I explained to 11 him some other things. 12 And then once we started seeing comments 13 from her and Jeremy coming back to me and asking 14 questions is when I really started to dive into 15 the books and realized that Allie was doing 16 certain things that made no sense in regards to 17 moving money from the bank from our business into 18 our personal accounts, and so there was a lot of 19 that confusion that I was then finally able to 20 identify, and now I see how she was doing it. 21 Q Do you agree with Mr. Harkness that the books are 22 a mess? 23 A Yeah. What I mean by a mess is that when you 24 reconcile you have to be able to classify things 25 into certain buckets, right, personal,</p>	<p style="text-align: right;">Page 24</p> <p>1 entertainment, all these different categories, 2 right, so that when it comes time to file your 3 taxes you can legitimately report that. 4 So what was happening was Allie would pay 5 off a personal creditcard that she would use and 6 book the whole payment as T&E or something other 7 than breaking it down by line item, and that 8 is when I say a mess is that we have no clear 9 understanding or division of personal versus 10 business, and that's going to take some time to 11 figure out. 12 Q Is there anything else that you consider to be a 13 mess about the books? 14 A That's all I have seen so far is being able to 15 decipher that. Yeah, so some other stuff, loan to 16 shareholder, that's really confusing, you know, 17 why she applies it just to me and not -- again, 18 I'm not sure on that either, so when she needs 19 money she takes it and then says, you know, money 20 to shareholder, right, versus loan to both parties 21 which is the way it should be done. 22 Q Didn't Alyson provide a breakdown of categories on 23 a general ledger to Jeremy Harkness? 24 A Yeah. Yeah. 25 Q So when you're talking about the mess being that</p>

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<p align="right">Page 25</p> <p>1 there were these broad categories and there needed</p> <p>2 to be smaller categories, that has already been</p> <p>3 done, right?</p> <p>4 A No, it's like I said. You know what I mean? You</p> <p>5 can't take alcohol sales and massages and personal</p> <p>6 things and classify it into the company. It</p> <p>7 shouldn't even be in the company, period, the end.</p> <p>8 And so if you want to really understand the value</p> <p>9 of any company, you have to keep legitimate books.</p> <p>10 If you took our books and you took it to the IRS,</p> <p>11 they would destroy me.</p> <p>12 Q Didn't Alyson break-down this already for</p> <p>13 personal expenses on a general ledger and give</p> <p>14 this to Jeremy Harkness?</p> <p>15 A Not that I saw. What does it say on the general</p> <p>16 ledger?</p> <p>17 Q Isn't there one category that says</p> <p>18 personal expenses that are on the general ledger?</p> <p>19 A I'd have to look. I have to look.</p> <p>20 Q Have you seen Jeremy's file?</p> <p>21 A Jeremy's file? What does that mean?</p> <p>22 Q Have you seen Mr. Harkness's file and all of his</p> <p>23 notes and all the ledgers and all the information?</p> <p>24 A Yeah, I think I've seen it. I haven't gone</p> <p>25 through it in great detail.</p>	<p align="right">Page 26</p> <p>1 Q Why haven't you gone through it in great detail?</p> <p>2 A Probably time, capabilities. I'm not good with</p> <p>3 this kind of stuff. The books part of it my dad</p> <p>4 and Allie I always thought had it handled.</p> <p>5 Q Have you seen Mr. Harkness's adjustments that he</p> <p>6 has made for certain things like</p> <p>7 personal expenses?</p> <p>8 A Yeah.</p> <p>9 Q Do you not agree with that?</p> <p>10 A Like I said, it just came down to really the way I</p> <p>11 solved the problem in my mind, in my head, when I</p> <p>12 looked at his papers was all related to the value</p> <p>13 of the company, right?</p> <p>14 And so in principle and what Jeremy</p> <p>15 confirmed for me is that if you have \$250,000 in</p> <p>16 the bank, right, that contributes to the value of</p> <p>17 the overall company, right?</p> <p>18 If you take \$70,000 or \$85,000 out of that</p> <p>19 bank and pay legal fees, personal legal fees,</p> <p>20 right, and you take another \$25,000 to pay for</p> <p>21 personal expenses and Allie's house that she moved</p> <p>22 into, Allie's cable, all this stuff, if the</p> <p>23 company pays all those things then the value of</p> <p>24 the company drops by that amount, and that's it.</p> <p>25 That's all I'm trying to say, and why this</p>
<p align="right">Page 27</p> <p>1 has been difficult is that they wanted to take a</p> <p>2 number that Jeremy pulled during a time when we</p> <p>3 had a lot of money in the bank or \$240,000 in the</p> <p>4 bank, but over a time period business was</p> <p>5 dropping. The company has been losing money for</p> <p>6 three years, so that number goes down, and that</p> <p>7 has been a very difficult problem to try to</p> <p>8 address and to communicate to people.</p> <p>9 Q How are you going to address this problem?</p> <p>10 A I think I've got a formula now that I can pick at</p> <p>11 any given moment and say what the company is worth</p> <p>12 using Jeremy's math and using real-life data. He</p> <p>13 doesn't know and Allie doesn't know what's</p> <p>14 retainer. Allie doesn't understand, and so I have</p> <p>15 a person that told me at least how to do the</p> <p>16 retainer part of it, right?</p> <p>17 Q So let's back up here.</p> <p>18 A Sorry.</p> <p>19 Q You just said a lot of stuff.</p> <p>20 A Okay.</p> <p>21 Q Who is this person you're talking to?</p> <p>22 A The person I'm talking to? Oh, this woman that</p> <p>23 looked at the books for me that I got into the</p> <p>24 back-end and looked at the books.</p> <p>25 Q What's her name?</p>	<p align="right">Page 28</p> <p>1 A Cathy. I have it written down. I found her on</p> <p>2 Upwork.</p> <p>3 Q Can you look for her information?</p> <p>4 A Two people looked at it.</p> <p>5 Q Can you get the names of the two people who looked</p> <p>6 at the books?</p> <p>7 A Sure. You know, again, like I said, it came down</p> <p>8 to the big issue was the reconciliation, and again</p> <p>9 I'm not trying to say that the final numbers</p> <p>10 didn't have total logic to me, you know, and again</p> <p>11 February 2nd, you know, the company was worth X</p> <p>12 amount, right? I didn't necessarily dispute that.</p> <p>13 But then in April when we pulled the second</p> <p>14 time it dropped just like I thought it would drop,</p> <p>15 and it was at 188. 186, and then it rounded up to</p> <p>16 188, and I didn't have an issue necessarily with</p> <p>17 that either.</p> <p>18 So again, Jeremy, you know, offered to do</p> <p>19 another evaluation, and it will come up even</p> <p>20 lower. So I am trying to hopefully have a formula</p> <p>21 that I think a judge would understand and respect.</p> <p>22 I'm just trying to be fair.</p> <p>23 I have no inclination of doing anything</p> <p>24 damaged, but you got to remember I'm dealing with</p> <p>25 a company that's losing money. I am trying to</p>

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1 hustle. I have an economy that has tanked. I am
 2 down to three clients. Luckily, I have one great
 3 client that is going to carry us through this, but
 4 the project ends at the end of August, so I don't
 5 know what I'm going to do then.

6 **Q Can you look up the names of the people who looked**
 7 **at your books, please?**

8 A Kimberly Rocca, R-O-C-C-A, and I found her on
 9 Upwork and she is certified in QuickBooks, and she
 10 has gone into them one time, and I had her outline
 11 and send to Allie, you know, certain things that
 12 we would want to do, and then also gave her
 13 instructions on how to deal with retainers so that
 14 we could see an accurate snapshot of the company,
 15 you know what I mean, that would say, oh, okay, we
 16 have \$100,000 in retainer that we're working
 17 against. Does that make sense?

18 **Q Who is the other person that looked at your books?**

19 A I'm looking. Matt. I'm just trying to see if
 20 he's got his last name. It just has Matt Y. I
 21 probably can find it. He was great. He didn't
 22 even charge me, which was even better, but I can
 23 try to find his last name because he e-mailed me,
 24 and he was the first one that looked at it and he
 25 has found some of the issues that Allie was

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1 **in a professional capacity?**

2 A Yeah. She had a company called TS Nextdoor.

3 **Q When did she have TS Nextdoor?**

4 A She still has it. She's had it for, god, I
 5 think -- she wanted to really get into event
 6 coordination and, you know, projects and that kind
 7 of thing because she's really good at it. I mean,
 8 she has done a ton with her best friend
 9 Dierdra Crew professionally. She has done, you
 10 know, things professionally for Rebecca Folsom,
 11 one of her accounts. She put on a whole album
 12 release event.

13 She has done -- I am just trying to think,
 14 but several over the years. I mean, we have a
 15 whole storage room of just event stuff from crates
 16 to giant vases to all that kind of stuff. She's
 17 masterful at it, to be honest with you. I hope
 18 that's where she lands. Yeah, I hope that's where
 19 she lands because she's brilliant at it.

20 **Q Going back to the formula that you've come up with**
 21 **for the business, what is the formula?**

22 A Well, again, it's like I said. It's tricky, but
 23 you have to take the money in the bank, right, and
 24 so again if we look at the money in the bank
 25 today, right, so we have \$100,000 in the bank,

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1 notified about too. Matt Yeager.

2 **Q How did you find Matt Yeager?**

3 A Upwork. It's kind of a recruiting -- it's a
 4 really cool place. I really wanted Allie to get
 5 on there. She'd make a fortune, but that's
 6 another story.

7 **Q Did you suggest that Allie get on Upwork?**

8 A Yeah. Yeah. I think it would be great for her,
 9 freelance independent stuff, project management,
 10 you know, not bookkeeping, but project management,
 11 event coordination. You know, she could make
 12 easily a lot of money. I wish she would do it.

13 **Q Does Allie have experience in project management**
 14 **and event coordination?**

15 A Huge. She's masterful at it, yeah.

16 **Q When did she manage projects or coordinate events?**

17 A God, I can tell you everything from Boulder
 18 Country Day, their annual Christmas party, to my
 19 50th birthday party was spectacular to working
 20 with the Niwot Arts Association, working with the
 21 Niwot Community Association. She's the vice
 22 president of that organization and coordinates a
 23 ton of different things from contests to -- you
 24 know.

25 **Q Has Allie managed projects or coordinated events**

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1 right?

2 We have a hundred, I think 100,000 in
 3 receivables which is great, but 100,000 in
 4 receivable contains, you know, a \$65,000 retainer
 5 so that, you know, goes to a different place,
 6 right, as far as value because it's unearned
 7 income.

8 So basically it's just saying, all right,
 9 the more money the company has to pay, the less
 10 valuable the company is, because you can't expect
 11 the company to have a value especially in our
 12 situation where I have to come up with the cash to
 13 give her which I have no issues giving it to her,
 14 but if I don't have it and the company has been
 15 depleted based on legal fees, her
 16 personal expenses, I don't see why the value of
 17 the company would be anything less.

18 **Q What is your opinion of the value of the company**
 19 **today?**

20 A I think at least based on what Jeremy told me the
 21 company doesn't have any greater value than what
 22 it's earning at that given moment, right, and
 23 what's in the bank, and that's what became very
 24 clear to me and what I tried to communicate to
 25 Allie when she started this whole let's have it

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<p style="text-align: right;">Page 33</p> <p>1 evaluated or when Carol said, oh, we'll just have 2 the company evaluated. 3 You know, I don't have employees. I have 4 three or four clients right now. You know, I have 5 an office I am trying to get out of. You know, 6 the company is down. It's showing a net loss of 7 over \$80,000 and last year it was 40,000 and the 8 year before that was 30,000. 9 So Jeremy looked and did a formula and 10 applied these multi-million-dollar metrics which 11 is great and I understood it and I have no issues 12 with his matrix, but his matrix contains cash on 13 hand and that contributes to the value of the 14 company, and so I'm just saying it's unfair for 15 anyone to take a number of the past and not look 16 to the future, so my formula, getting back to your 17 question -- 18 Q We have one question that you need to answer. 19 What is your opinion of the value of the company 20 today? What is the number? 21 A I think I see it -- saw it at 86,000 today, but I 22 think it's going to go up, so I think it's going 23 to be in that 130-150 range is what I'm hoping 24 that Allie can walk away with a nice check there. 25 Q Do you agree that 15,000 should be added like</p>	<p style="text-align: right;">Page 34</p> <p>1 Jeremy Harkness did as part of a going concern? 2 A You mean as far as the 15,000 assets, the liquid 3 assets like furniture and all the computers? I 4 think that seems fair. 5 Q You would agree to add \$15,000 to 86,000 then? 6 A I think the 86 took that into account, but I would 7 have to look at the -- like I said, I just sent it 8 to -- I just tried to finish it last night because 9 really, like I said, you know, with the changing 10 of attorneys it slowed everything down, you know. 11 Q Do you understand that the 15,000 is for a going 12 concern meaning that your company is still going 13 to exist? That's what that number means? 14 A The 15,000 at least the way I remember the 15,000 15 it was like equipment, so I'm not sure what you're 16 asking. I was told it was equipment in the 17 numbers. 18 Q Who told you that it was equipment? 19 A Well, that's what I thought it was. I mean, I 20 remember seeing something that -- I mean, if you 21 have something, I'd be glad to look at it. 22 Q So you described -- 23 A But I am not going to argue over \$7,500 if 15,000 24 is something relevant, right? 25 (Exhibit 1 marked.)</p>
<p style="text-align: right;">Page 35</p> <p>1 BY MS. MILFELD: 2 Q I am showing you what is marked as Exhibit 1. 3 A Okay. Isn't it crazy we never saw this document? 4 Q Charlie, you just said that you've never seen this 5 document. Have you not seen this report? 6 A Nope, never, never seen it, never seen it. 7 Q How is it you've never seen Mr. Harkness's report? 8 A Look, why did I get rid of Lyons Gaddis? This 9 shit. It drives me crazy. You know, you guys 10 being told one thing and never getting reports. 11 John, you know, sent a long e-mail saying, oh, I'm 12 so sorry. We tried this new system, blah, blah, 13 blah. 14 And then I got all the -- and then I 15 sent -- when I thought this existed, I sent them 16 an e-mail asking for it, and I got back the 17 spreadsheet, and so I've been looking mainly at 18 the spreadsheet, not at anything like this, and I 19 apologize. We'll take a look. Is this the latest 20 one? This is the original? Is this the original 21 one, the February 2nd kind of thing? 22 Q So if you look on page 1, Charlie, it says as of 23 February 28th. 24 A Yeah. 25 Q The cover page.</p>	<p style="text-align: right;">Page 36</p> <p>1 A Okay. Got it. 2 Q So have you seen this or have you not seen this? 3 A I have not seen this. 4 Q Can you flip to the back where it shows the 5 schedules? Have you seen these schedules before? 6 A This would have been nice to see. Jesus Christ. 7 THE COURT REPORTER: Please speak out 8 loud. 9 A I said this would have been nice to see. I have 10 seen some of this. 11 Q Where have you seen this? 12 A I got -- I had something sent separate. I'll pull 13 it up. Yeah, like I said, I have seen something 14 like this that had the different years and then it 15 had one number at the bottom that said 188. Is it 16 okay if I pull it up, the one I have? 17 Q No, don't pull that up, please. 18 A Okay. That's fine. 19 (Exhibit 2 marked.) 20 BY MS. MILFELD: 21 Q I am showing you what is marked for today as 22 Exhibit 2. Have you seen this document? 23 A Nope. I think I have seen something like this, 24 but I'd have to look at it and cross-compare with 25 what I have that I got from Lyons.</p>

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1 Q When you take a break will you agree to look and
 2 see what you've received?
 3 A Yeah. And remember the last time when they
 4 re-evaluated the thing and then they just sent me,
 5 you know, the spreadsheet where they adjusted
 6 things.
 7 Q The spreadsheet with the adjustment is Exhibit 2.
 8 A Oh, this is it?
 9 Q Take a look at it and see if this jogs your
 10 memory.
 11 A Not really, one page. I don't know what to tell
 12 you. I mean, I'd have to look at what I have.
 13 Q Well, why don't we take a break so that you can
 14 look at your e-mail, and then when we get back
 15 we'll talk about what you have seen.
 16 A Yeah.
 17 (Break taken.)
 18 BY MS. MILFELD:
 19 Q Did you have a chance to look at what you received
 20 in your e-mail?
 21 A Yeah, and I did receive the original thing that I
 22 said I didn't receive, so I did receive it. I
 23 just never read it or I read it whenever it was
 24 issued, and then I've been focusing on this newer
 25 spreadsheet which we don't have from you yet that

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1 A Jeremy. It's Jeremy's.
 2 Q Will you send this to us?
 3 A Of course.
 4 Q You gave a description of the formula.
 5 A Yeah. Look, it's Charlie Bell's formula.
 6 Q Do you have a mathematical formula written down or
 7 do you just have a description of what you would
 8 do?
 9 A It's not -- I don't want to say it's mathematical.
 10 All I'm going to tell you is that I think I have a
 11 means to be able to adjust this based on Jeremy's
 12 formula, not mine, based on Jeremy's formula when
 13 he came up with this.
 14 Q Would you say that you're tweaking Jeremy's
 15 formula?
 16 A Nope. I'm using Jeremy's formula.
 17 Q So when you were talking earlier before we took
 18 the break about your formula, you're really
 19 referring to Jeremy's formula?
 20 A Yeah, that's what I'm trying to -- you know, I
 21 sent him an e-mail yesterday to ask for his
 22 spreadsheet so that I could then enter a number
 23 just like you guys had that incredible spreadsheet
 24 that allows me to work on our offer and adjust it
 25 accordingly which has been great, so we have been

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1 has the indicated fair market value of
 2 Charles Bell's hundred percent ownership interest
 3 at 188. That's the latest one we have been
 4 working with.
 5 Q To be clear, you have received Exhibit 1 --
 6 A Yes.
 7 Q -- which is the valuation as of February 28th?
 8 A Correct.
 9 Q You have read it. You just haven't looked at it
 10 in a long time?
 11 A Yeah. I haven't looked at it because we got the
 12 updated one that's dated April 30th, 2023 that I
 13 have been referring to because that was the one
 14 that was adjusted.
 15 Q Exhibit 2, have you seen Exhibit 2?
 16 A Yeah. But Exhibit 2 does not have what I have
 17 that I was given. It's from April 30th, 2023.
 18 Q Do you see the last page schedule 7 shows the same
 19 day, if you look at Exhibit 2, schedule 7?
 20 A Is that Exhibit 2? Okay.
 21 Q Because Exhibit 2 is dated as of April 30th, 2023.
 22 What are you looking at that's different than what
 23 I am looking at?
 24 A A different number.
 25 Q Who gave you this exhibit?

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1 working on that as well.
 2 Did you send it to Carol?
 3 Q Charlie, if you could just send what you just
 4 showed me to Ms. Glassman?
 5 A Yeah.
 6 MS. GOFF: Send it to me too, but I'm
 7 sure it's in my file.
 8 THE WITNESS: All right.
 9 MS. GOFF: So are you sending her --
 10 THE WITNESS: I'm sending her the PDF,
 11 yeah, the thing that I just showed her.
 12 MS. GOFF: Okay. It's the one that has
 13 the 188 on it.
 14 BY MS. MILFELD:
 15 Q Thank you.
 16 A Yeah.
 17 Q Charlie, when you were talking about the formula,
 18 you said you're looking at the money in the bank
 19 today?
 20 A Uh-huh.
 21 Q You look at receivables?
 22 A Yeah.
 23 Q You're taking out the retainer and you're putting
 24 that in a different place?
 25 A Well, it's still there in the bank. Yes, at least

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1 logistically I'm doing that.

2 Q **In the most simplest way, that's how you're**

3 **arriving at 86,000?**

4 A Yes. Yes.

5 Q **Is there anything I just said that is wrong about**

6 **what you're doing to come up with 86,000?**

7 A I don't want to be -- I don't want to be

8 confusing. Am I standing strong on the value of

9 the company is 86,000? Not at all. I am still

10 working on it.

11 Kathryn just got it. We're going to go

12 over it. I'm going to think about sending it to

13 my father who is a CFO, you know, doing that, and

14 then if Jeremy gets me how he inputted the numbers

15 then I think it will be a lot clearer because then

16 it's using Jeremy's, and that's why Jeremy, I

17 think, recommended that we possibly do another

18 evaluation on the company.

19 Q **When did Jeremy recommend that?**

20 A I don't think he recommended it. He offered it,

21 right? Is that a better way of saying that?

22 Q **Charlie, have you asked Jeremy to do another**

23 **evaluation?**

24 A No, I have not.

25 Q **Are you going to ask Jeremy to do another**

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1 dollars. Great. We are taking an advance or we

2 are taking an extra salary thing. We should

3 probably pay taxes on it, and that's how it is.

4 We don't just route it in this weird way she does

5 and books it all against loan to shareholder.

6 Q **What is your concern about the way that she is**

7 **doing it now? What's the impact of it**

8 **practically?**

9 A Well, the impact was -- I'll tell you. The impact

10 was when they made their offer that they wanted me

11 to make a salary of 130 because that's what Allie

12 I think told people, but it was so confusing since

13 we have never paid ourselves more than 133.5

14 combined that I thought we were living off of and

15 I was told that, but we weren't.

16 Q **Would you agree that the Tool Studios income is**

17 **your income? There's one source of money that is**

18 **coming into your household and that's through**

19 **Tool Studios?**

20 A I want to answer that question. I think that has

21 been our income. I have a very strong opinion

22 about how the company works, so it's our income.

23 You want to call it my income, whatever. It's our

24 income.

25 She works as hard for Tool Studios as I do,

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1 **evaluation?**

2 A I think I want to make an offer before I do that,

3 but it will be based on what I think he would do.

4 It will be based on how I think his formula was

5 calculated, so when we make the offer it will be

6 based on his formulas and adjusted to what we

7 think the income will be, you know, at the end of

8 this, and I want to stop. Look, what makes it so

9 difficult is that you have all this spending going

10 on that the company is paying for that I want to

11 stop.

12 Q **What spending do you want to stop?**

13 A Personal.

14 Q **How are you going to stop that?**

15 A You know, we have a separate account that Allie

16 has refused to allow me access to that has over

17 10,000 in cash in it and that is our remaining

18 personal income outside of my IRAs that I have

19 asked her to move into our personal and pay with

20 that money, so that's the only way right now or

21 with creditcard or if we have to use the company

22 then the company would disburse advances to both

23 of us against our salary equally is what I think

24 would be the fairest thing to do.

25 It's like, okay, we need a thousand

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1 if not harder, just different roles and different

2 responsibilities, but it's very intertwined. It's

3 very -- it's too intertwined. It doesn't stand

4 alone. You know what I mean? It's like two

5 pillars, Allie, Charlie, Tool Studios. If one

6 pillar fucking bails, and vice versa. That's just

7 the way it is for me.

8 Q **When you just said that you're one pillar and**

9 **Allie is another pillar of Tool Studios, what is**

10 **going to happen when Allie leaves?**

11 A I'm struggling with that right now, really

12 struggling, to be honest with you. I can tell you

13 I'm working on my resume. I can tell you that I'm

14 sad. It's very sad for me.

15 Q **Do you think the company will no longer go on**

16 **without her?**

17 Are you saying that you do not think that

18 the company can continue without Allie?

19 A I don't know. I know to replace her in all that

20 she does for me both personally and professionally

21 is going to be expensive.

22 You know, 22 years having somebody that

23 handles all the details and lets you just create

24 and sell, you know what I mean, and having

25 somebody take care of all that for you personally

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<p style="text-align: right;">Page 45</p> <p>1 and professionally and then all of a sudden have 2 somebody walk away from all that, you know, it 3 leaves you in a very challenging position and, 4 you know, I hired an executive coach, but then she 5 made me stop that to try to help me figure out how 6 I would be able to be more organized.</p> <p>7 As far as, you know, having an ADHD brain, 8 you know, it needs that. It's highly creative, 9 highly intelligent, but it needs that yang, if 10 that makes sense, and I have to pay for that and I 11 have to outsource all that, and at the same time 12 trying to be a good father which is extremely 13 important to me right now. A job -- being 14 employed by somebody else is really appealing is 15 what I'm getting at.</p> <p>16 Q It's appealing to you?</p> <p>17 A Oh, totally, but it's also, you know, you have the 18 company on one hand and the clients 19 responsibility, right, to take a 21-year-old 20 company and liquidate it is a challenge, but as 21 clients have been diminishing in the economy and 22 my big focus has been on cannabis for the last 23 five years, six years, and with its big turn-down, 24 you know, then you have to almost re-invent 25 yourself, re-invent yourself, and it's a struggle.</p>	<p style="text-align: right;">Page 46</p> <p>1 It's really hard, and three years in a row 2 losing money, and then you have this and somebody 3 just telling you, you know, you need to pay me a 4 hundred -- it just doesn't make sense to me.</p> <p>5 Q I want to break-down a few things about what you 6 said. How has Allie personally contributed to the 7 company?</p> <p>8 A Personally? I mean, obviously she just takes care 9 of it and she gets everything done, all the books, 10 all the taxes, all the filing, all that. She 11 print-buys for the company.</p> <p>12 She used to do more, but then she started 13 refusing, so that put more on me, and working 14 70 hours a week for years, you know, was the only 15 way I could generate, you know, the 500 to 16 million-dollar company, and it took its toll. It 17 took its toll on my marriage. But that was our 18 thing, our division of labor.</p> <p>19 Q You were talking about how Allie made personal 20 contributions and professional contributions that 21 are difficult to replace.</p> <p>22 A Difficult for me.</p> <p>23 Q What personal contributions are you talking about? 24 Are you talking about print work or are you 25 talking about something else?</p>
<p style="text-align: right;">Page 47</p> <p>1 A Personal contributions? Her structure and 2 organizational skills. That's her contribution to 3 the company.</p> <p>4 Q Anything else?</p> <p>5 A Yeah. No. I mean, over 22 years there has been 6 so many things. I mean, I'm just trying to think 7 of all the details, you know, everything. Can you 8 run this by -- you know, over to Callie's? Can 9 you wire this company money?</p> <p>10 You know, so all that, all the day-to-day 11 account support stuff that she used to do a lot 12 more of until this happened, and now it's very 13 difficult to try to communicate, you know, via 14 Talking Parent app.</p> <p>15 Q You said that it's appealing for you to work for 16 someone else. Have you been looking for jobs and 17 where have you been looking?</p> <p>18 A No. I have started working on -- look, I'm a 19 member of LinkedIn and I'm wired in to get, you 20 know, positions or whatever that might work for 21 me, but I've not really done anything, and mainly 22 because we've got this project that came in right 23 after the divorce and it's a great project.</p> <p>24 It has allowed me to pay all these bills 25 because we were definitely on the brink of tanking</p>	<p style="text-align: right;">Page 48</p> <p>1 and this came along, but it needs my time. Like 2 today, you know, I've been getting lectured by 3 clients because of this shit, so I don't know what 4 to tell you.</p> <p>5 Q When you said that you might liquidate or 6 liquidation is a possibility, do you have an 7 opinion about the liquidation value of the 8 company?</p> <p>9 A Honestly, I think it's the same as what Jeremy 10 determined the value to be, so I think it's the 11 same. I don't see the intrinsic value beyond what 12 you were talking about, some magical number that 13 exists, you know what I mean, that doesn't take 14 into account equipment and cash in the bank.</p> <p>15 Q You have seen now Exhibit 1 as of February 28th.</p> <p>16 A Yep.</p> <p>17 Q And Exhibit 2 as of April 30th and Exhibit 3 which 18 is also April 30th. What value are you agreeing 19 with?</p> <p>20 A I can't determine that amount, what you're asking 21 me to determine, without knowing what expenses 22 exist either on a creditcard I am not aware of 23 based on legal fees that I have not accounted for, 24 so until I have all those numbers or until we can 25 freeze those numbers into a place, I can't give</p>

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1 you that answer, but I'm telling you every spare
 2 moment I have, which is not a lot, I am trying to
 3 come up with that very reasonable number, and the
 4 188 is a lot closer to it than the original one
 5 was, and if I had Jeremy do another one it will be
 6 a little lower. I'm guessing it's going to be in
 7 the 140 range maybe, 138, is what I'm thinking.
 8 **Q The 188 number you're referring to is the number**
 9 **you saw in your e-mail?**
 10 A Yeah, the one I just sent you.
 11 **Q Do you agree or disagree with that number?**
 12 A At that time? I agree at that time.
 13 **Q At that time being when?**
 14 A Whenever he pulled those numbers. I think there
 15 was some -- there was some discrepancies when I
 16 first saw that and I saw the numbers. If I
 17 remember correctly, that's what stirred him to
 18 say, Charlie, if I have to do this again it's
 19 going to just lower it by that amount.
 20 So when I challenged the 188 with some new
 21 information that I had gotten, new expenses of the
 22 company, then he said, look, you don't want to pay
 23 me to re-do this. It just comes off the bottom
 24 line.
 25 So that's when I knew -- that's when I was

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1 fees.
 2 **Q Do you have that information available to you now?**
 3 A No.
 4 **Q Why not?**
 5 A No clue.
 6 **Q Did you send Mr. Harkness an e-mail?**
 7 A No.
 8 **Q You're saying that you gave him this number over**
 9 **the phone?**
 10 A Yeah. I called him and I said, hey, what about
 11 this? I'm trying to think. What about -- I think
 12 it was legal fees. I said we just got \$15,000
 13 more in legal fees. Can you get that adjusted to
 14 this number? And he said something like -- that's
 15 when it sparked the conversation as best as I
 16 remember.
 17 **Q You wanted Mr. Harkness to include legal fees,**
 18 **correct?**
 19 A Well, he had included them previously, but he
 20 didn't include the new ones that had accumulated
 21 by the time he made the adjustment. See, it's a
 22 moving target.
 23 That's what's so difficult, and if we
 24 stopped spending personal money, if the company
 25 was just -- you stop doing that, then we would

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1 led to believe that, okay, the cash in the bank
 2 did play into this number directly, and he said
 3 it. Like I said, he said it.
 4 **Q So as of April 30th you agree that the value of**
 5 **the company was \$188,000?**
 6 A No, I do not. I said that I had challenged it
 7 with some numbers at that time, and that's when he
 8 said to me, Charlie, you don't want to pay me to
 9 enter that because it's just going to do -- it's
 10 just going to decrease the number, and so again I
 11 think I've been pretty clear about my opinion
 12 about the value of the company.
 13 **Q Well, help me understand because you just said a**
 14 **few minutes ago, "I agreed with Mr. Harkness's**
 15 **number at the time." Now you just said, "I don't**
 16 **agree with the number."**
 17 A No. What I said was I did say that at first, but
 18 then I caught myself and said, oh, yeah. Now I
 19 remember that there was an adjustment that I sent
 20 to him when I saw those numbers that would have
 21 lowered it, and that's when he stopped me and
 22 said, Charlie, we don't need to keep going about
 23 this. That number will lower the thing.
 24 **Q What was the adjustment that you gave him?**
 25 A I don't remember. I think it had to do with legal

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1 have a very consistent business evaluation, but
 2 when you keep fucking sucking out big numbers, the
 3 value goes down, and that's why this has been so
 4 challenging.
 5 **Q Do you understand that Mr. Harkness's valuation**
 6 **process takes into account personal expenses,**
 7 **reoccurring expenses, and makes adjustments based**
 8 **on that?**
 9 A Yeah. Like I said, I didn't know what to tell
 10 you. It is what it is.
 11 **Q Do you expect legal fees to continue after the**
 12 **divorce is over?**
 13 A No.
 14 **Q What other personal expenses are happening now**
 15 **that you think will not be recurring?**
 16 A I think some therapy for sure. I think legal
 17 fees. All of Allie's, you know, alcohol, massages
 18 and whatever else she is running through T&E so
 19 all her personal stuff, all her home. The company
 20 has paid for her rental, has paid for her -- all
 21 her living expenses because keep in mind she has
 22 not tried to get a job.
 23 **Q Are the legal fees something that has only been**
 24 **happening since the divorce?**
 25 A Yeah.

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<p align="right"><i>Page 53</i></p> <p>1 Q How about the therapy, is that something that's --</p> <p>2 A No. My one --</p> <p>3 Q If you could just for the reporter if you could</p> <p>4 just let me finish the question.</p> <p>5 A Oh, I'm sorry.</p> <p>6 Q Therapy expenses, were you incurring those before</p> <p>7 the divorce?</p> <p>8 A Yeah.</p> <p>9 Q Would you say you are paying more now for therapy</p> <p>10 than you were before?</p> <p>11 A Absolutely.</p> <p>12 Q You would agree that there are significant</p> <p>13 expenses that are unique to the divorce?</p> <p>14 A Absolutely.</p> <p>15 Q Do you think then it's fair to value your company</p> <p>16 and take into account expenses that aren't going</p> <p>17 to be there in a few months?</p> <p>18 A I think that's been the challenge for me to think,</p> <p>19 all right, but that's when I started looking at</p> <p>20 the history, right, of the company and I started</p> <p>21 saying, all right, we've been losing money now for</p> <p>22 three years so the money is being depleted, and</p> <p>23 can I stop that?</p> <p>24 I am hoping I can stabilize it to make a</p> <p>25 run at it, do you know what I mean, to keep the</p>	<p align="right"><i>Page 54</i></p> <p>1 company, but it's just a difficult decision to</p> <p>2 make, if that makes sense. Do you know what I</p> <p>3 mean?</p> <p>4 So you have been losing money before the</p> <p>5 legal fees, before all the other stuff, right, so</p> <p>6 now you start sucking away all the money that</p> <p>7 you've set aside for legal fees and all that kind</p> <p>8 of stuff. You know, in a small company, you know,</p> <p>9 you can wipe it out.</p> <p>10 I can't run a company without working</p> <p>11 capital. I can't, but yeah, I do think that if we</p> <p>12 got rid of all this stuff or if Allie made the</p> <p>13 49.5 that she says she can make in her offer, if</p> <p>14 she was contributing that to the company I</p> <p>15 think -- or contributing that to the unit, then I</p> <p>16 think then the company's value obviously would be</p> <p>17 more, but we'd have -- and I have no issues with</p> <p>18 that, so I'm just trying to be fair.</p> <p>19 Q Because of legal fees, increased therapy expenses,</p> <p>20 would you say that more money has been going out</p> <p>21 since the divorce than previously?</p> <p>22 A Yeah, in legal fees, yeah, yeah.</p> <p>23 Q As well as the therapy expenses?</p> <p>24 A There has been always some therapy expenses, but</p> <p>25 yeah.</p>
<p align="right"><i>Page 55</i></p> <p>1 Q But yeah they have been increasing?</p> <p>2 A Increasing, yeah. Look, absolutely. There has</p> <p>3 been more expenses since Allie left than before on</p> <p>4 the company, absolutely, right.</p> <p>5 And I know your point and you're making a</p> <p>6 great point and the point I have totally taken</p> <p>7 into consideration, so when it came to determine</p> <p>8 what the value of the company was, but now to move</p> <p>9 forward I have to estimate what it's going to cost</p> <p>10 to replace Allie, right, and all her</p> <p>11 responsibilities.</p> <p>12 What is it going to take to replace the</p> <p>13 things I need to do personally and have to hire</p> <p>14 somebody to do for me personally in order to even</p> <p>15 attempt to make the income that you guys think I</p> <p>16 should be able to make without Allie which is more</p> <p>17 than what I made with Allie, so that doesn't make</p> <p>18 sense, but another story.</p> <p>19 Q What is the point that you think I'm trying to</p> <p>20 make?</p> <p>21 A If you remove all that kind of stuff, so you're</p> <p>22 saying after the divorce the company's value is X</p> <p>23 or what its value was prior to -- it's really the</p> <p>24 divorce.</p> <p>25 So for me the point you're trying to make</p>	<p align="right"><i>Page 56</i></p> <p>1 is -- I want to say this right. I'm sorry.</p> <p>2 Before the company had to pay all these expenses,</p> <p>3 it was worth X amount is what you're trying to say</p> <p>4 and that it will be worth X amount if we remove</p> <p>5 all that money from it today, it would be worth</p> <p>6 that. And like I said, I have no issues with that</p> <p>7 part of it.</p> <p>8 Q You agree with that?</p> <p>9 A I agree that -- I agree with the formula that</p> <p>10 Jeremy came up with to come up with the numbers</p> <p>11 that he came up with, so those numbers would</p> <p>12 adjust accordingly based on the current status of</p> <p>13 the company, so after this is all said and done,</p> <p>14 right, the company's value will be exactly as</p> <p>15 close as I can get to what I offer you.</p> <p>16 In six months from now I'm gambling on the</p> <p>17 fact that I can stabilize it and accommodate the</p> <p>18 losses that were happening before all this because</p> <p>19 you remember before legal expenses, before all</p> <p>20 that kind of stuff, two years we've lost close</p> <p>21 to 50,000 in one year and 40 another, so I have to</p> <p>22 remove this middle piece and have a lot less money</p> <p>23 and compensate for that negative number for</p> <p>24 two years.</p> <p>25 Q Before the divorce the 50,000 and 40,000, what</p>

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<p align="right">Page 57</p> <p>1 accounts for those losses?</p> <p>2 A In reflection, we were paying ourselves too much.</p> <p>3 That was the problem.</p> <p>4 Q As you sit here now you are saying that your</p> <p>5 salary, what you're paying yourself accounts for</p> <p>6 those losses?</p> <p>7 A Yeah, I mean -- I mean obviously, you know,</p> <p>8 according to Allie that's what she said too. She</p> <p>9 said that the company was paying \$30,000 more than</p> <p>10 what we were paying for salaries, so she was</p> <p>11 taking \$30,000 more out beyond our salary.</p> <p>12 Q Do you agree with that?</p> <p>13 A Obviously that looks to be what happened. I mean,</p> <p>14 I don't see any other way of doing it. We don't</p> <p>15 have employees. You know, the company</p> <p>16 generates -- you know, it's a pretty simple</p> <p>17 equation. You know what I mean? I bill \$100 an</p> <p>18 hour and pay somebody 60 an hour, and I have to</p> <p>19 pay all the overhead and I have to pay my salary</p> <p>20 and all that kind of stuff, so it's just math.</p> <p>21 Q Do you agree that your company's value can change</p> <p>22 quite a bit from month to month?</p> <p>23 A I think it can change with -- yeah. Look, I know</p> <p>24 that the phone could ring tomorrow and somebody</p> <p>25 would need a \$10,000 logo or, you know, a project,</p>	<p align="right">Page 58</p> <p>1 you know, that are rare, but I got one in 2020</p> <p>2 that was life-changing. Could it happen again?</p> <p>3 Sure.</p> <p>4 But for the most part, you know, when you</p> <p>5 look at the long-term thing about it, you know,</p> <p>6 the post-COVID thing has been the difficult thing</p> <p>7 because, you know, I lost all employees and it's</p> <p>8 been -- so to answer your question, I'm sorry,</p> <p>9 probably, yes, it can change from month to month</p> <p>10 with a phone call, but for three years it's</p> <p>11 definitely been declining.</p> <p>12 So that's a pattern I can't ignore, and I</p> <p>13 think it had to do a lot with, you know, 2020 we</p> <p>14 were very successful because of the cannabis</p> <p>15 industry and everything went mobile and everything</p> <p>16 went -- you know, you needed to have a website</p> <p>17 that could take orders and then people could drive</p> <p>18 up and pick it up.</p> <p>19 So it was a really interesting trend that</p> <p>20 happened and we definitely rode it well, and then</p> <p>21 when it was over is when I started saying, oh,</p> <p>22 shit. The pandemic that hit so many other firms</p> <p>23 like mine is going to catch up to me, and that's</p> <p>24 what actually I think is happening and why we are</p> <p>25 down to only a few clients.</p>
<p align="right">Page 59</p> <p>1 Q How many clients do you have now?</p> <p>2 A Four active.</p> <p>3 Q At some point did you ask Mr. Harkness about doing</p> <p>4 an evaluation that took into account averages?</p> <p>5 A Yeah. I think that's part of his formula, I</p> <p>6 think, isn't it? I don't know. I never asked him</p> <p>7 about it, but I assumed. I know that he threw out</p> <p>8 -- I know he looks at however many years and he</p> <p>9 then threw out the 2020, I think, in his equation</p> <p>10 because he saw it as an outlier.</p> <p>11 Q Do you agree with that?</p> <p>12 A Yeah, I do agree that that would be a reasonable</p> <p>13 way to do it. I mean, it's definitely how I felt</p> <p>14 like calculating my salary was going to be. We</p> <p>15 looked at social security and we looked at</p> <p>16 averages over the year, and how you guys came up</p> <p>17 with your number, I don't know, but I know what I</p> <p>18 have been paid over averages, and it's lower than</p> <p>19 what you guys think.</p> <p>20 Q Why do you think 2020 should be taken out?</p> <p>21 A It was an outlier. Statistically, you know, when</p> <p>22 you have standard deviations you take out the</p> <p>23 lowest and the highest and that's when you get a</p> <p>24 more accurate average.</p> <p>25 If you bring in an outlier, it jacks</p>	<p align="right">Page 60</p> <p>1 everything up and it's not realistic, especially</p> <p>2 in this one scenario. You know what I mean? I</p> <p>3 got fired at the end of the project, but I got</p> <p>4 paid a lot of money.</p> <p>5 Q Did Mr. Harkness take out the lowest number?</p> <p>6 A No, because I think they all -- the rest of the</p> <p>7 numbers were very consistent.</p> <p>8 Q Did you ever ask Mr. Harkness about using a</p> <p>9 different valuation date after you received the</p> <p>10 first report?</p> <p>11 A No. I think when I saw the first report and then</p> <p>12 him and I talked afterwards and he kind of</p> <p>13 explained certain things about how they evaluated</p> <p>14 it, and like I said, for the longest time I was</p> <p>15 very confused on, you know, doing this number in</p> <p>16 the past.</p> <p>17 You know, I mean, I understand in theory</p> <p>18 for sure, but when you have a company that's this</p> <p>19 small, you know what I mean, that, you know, the</p> <p>20 bank account changes like you said, you know,</p> <p>21 month to month, and if you study the trends over</p> <p>22 three years you will see, all right, something's</p> <p>23 got to change and you can't keep spending money or</p> <p>24 the company will be without, and a company without</p> <p>25 any money can't exist, and that's the course we</p>

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1 are on.

2 Q Let me ask the question again.

3 A Okay. I'm sorry.

4 Q Did you ask Mr. Harkness to value the company as

5 of April 30th, 2023?

6 A No, I did not. John did. John felt it was going

7 to be a good exercise.

8 Q Did you agree with John?

9 And when you say "John," do you mean

10 John Gaddis?

11 A Yes.

12 Q Did you agree with Mr. Gaddis that the company

13 should be valued as of April 30th, 2023?

14 A Yeah. Yeah. He said, oh, let's have it

15 re-evaluated, and then once that happened we were

16 able to see the pattern, and that's where I knew

17 the 188 would change and would fluctuate, and is

18 it a reasonable number? I'll think about it. You

19 know what I mean? If that's the number we want to

20 die on, then that's a possibility.

21 Q The 2020 year that you said was an outlier, who

22 was the client in 2020?

23 A Trulieve, T-R-U-L-I-E-V-E.

24 Q How did you get involved with Trulieve?

25 A A long story, but I'm not going to tell it. It

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1 came from the same referral as Trulieve and I can

2 tell you that he's this incredible dude that is

3 one of the wealthiest men that I know and I'm

4 excited about this project that we are doing, but

5 the project itself is 180,000 maybe, and from that

6 it will be 20 percent maybe profit at least. I

7 know we just got -- I know we made 13,000 off the

8 last two months, so if they paid us 120,000 and we

9 made 15,000, so whatever that is.

10 Q Who is the client?

11 A TelyRx. It's an online pharmacy.

12 Q How do you come up with 20 percent profit out of

13 180,000?

14 A I don't. It's a freaking guess. I have no clue.

15 I don't even know how I estimate it, but what I

16 do do is that I try to get clients to time and --

17 what do they call it? Time and materials so that

18 -- just like attorneys.

19 So that's how I run my company, very much

20 like attorneys, but I have several attorneys

21 working for me when things really go like Trulieve

22 why we made so much money is I had, I think, 14

23 people working on three continents. They were

24 paying me 150 an hour, and I was paying 65 an hour

25 for them.

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1 was just somebody that I had done other work for

2 in the cannabis space heard about -- you know,

3 knew that we did web, and I met him and he brought

4 me into the company and they hired me to do this

5 project. It was two years, '19 and '20.

6 Q Would you say you pursued the client or did the

7 client pursue you?

8 A I don't pursue.

9 Q Why don't you pursue clients?

10 A I haven't had to. Well, I need to, but I haven't.

11 Look, I'm going to say it again. To generate the

12 money I have to generate and work 70 hours a week,

13 it doesn't leave a lot of room to do sales calls

14 or do things, you know, that Allie in the past has

15 helped do.

16 And when you cut that person out, you have

17 to work 70 hours to just try to keep up, and it

18 was a mistake of mine. I made a mistake in

19 working that much, and I don't want to do it

20 anymore, but until Allie gets a job, I'm screwed.

21 I have to keep doing it.

22 Q Did you tell Allie recently that you had a client

23 on the line that would be worth more than

24 Trulieve?

25 A No. I can tell you that the client that I got

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1 Q Do you think it's possible to obtain another

2 client like Trulieve?

3 A I don't think I want to, honestly. I think it

4 really was the most difficult time period of my

5 life personally and professionally.

6 You know, you have kids that are dying for

7 your attention. You have a wife that, you know,

8 has her issues that's telling you, you know, you

9 work too much, but then you try to explain.

10 You know, no, no, not without the appropriate

11 people in place. I tried to do it alone and it

12 was -- like I said, we got fired at the end.

13 Q You don't want to try to obtain another client

14 like Trulieve, but would you agree that it's

15 possible for you to do that?

16 A I can tell you that I -- look, I'm going to be

17 totally honest with you, and Allie will contest to

18 this. She always said, Charlie, you need somebody

19 that can manage the account and take care of the

20 detail work, right? And I agreed with that, but I

21 couldn't figure out a way to finance it. Do you

22 know what I mean?

23 It's like if you're losing \$40,000 and

24 somebody says, hey, you need to hire somebody

25 that's a \$75,000 person a year, then what do you

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<p style="text-align: right;">Page 65</p> <p>1 do? You know, I think for me I just said you just 2 got to keep working, and that was a very 3 contentious position of my marriage. 4 It was like, Allie, I agree, but I don't 5 know how to afford it. And that's when we 6 would -- you know, when are you going to get a 7 job, you know what I mean, to help. You know, 8 when are you going to come back and start helping 9 with the company? And that was always just 10 problems. 11 Q I guess I'm a little confused. 12 A Sorry. 13 Q Because when you had Trulieve you were able to 14 afford it, right? 15 A Afford what? 16 Q You were able to afford working, taking care of 17 expenses? 18 A Uh-huh. Yeah, but it was pure chaos, and I had to 19 work 80 hours a week during that time period. 20 Q How long were you working 80 hours a week for? 21 A Over a year. 22 Q How many hours a week did you work before you got 23 Trulieve? 24 A Probably close to the same, less though, less 25 stressful. Look, we went from one point -- we</p>	<p style="text-align: right;">Page 66</p> <p>1 went from \$10,000 a day to 1.7 million in 2 six months. It's never been done in the world. 3 It's never what I did. Never been done before. 4 And I would love to monetize that 5 knowledge, and I'm trying to do that and I think 6 that's what makes it so difficult, you know, 7 because I'm brilliant, but I'm also chaos, and I 8 know that's hard for people, you know, 9 professionally with me, but it is what allows me 10 to do the things that people haven't done before. 11 Q How are you trying to monetize that now? 12 A I told you I was working on my resume, and that's 13 the story I'm trying to tell is that I'm a 14 thinker, and I've been talking to my friends that 15 are wanting to be consultants, you know what I 16 mean, and more like you guys. 17 You know, I spend a lot of my time actually 18 doing designing and wire-framing, and that's time 19 I'd much rather be directing and talking to people 20 and that's why, like I said, I'm looking at, you 21 know, different career paths that potentially 22 would allow me to monetize that and make good 23 money and be able to pay Allie more. I'm not this 24 evil guy that people think I am. 25 Q How much money do you think you can make?</p>
<p style="text-align: right;">Page 67</p> <p>1 A I really don't know. I can tell you I'm scared to 2 try it because of my limitations, but at least 3 what I have read it's in the hundred-thousand 4 range, you know, a hundred thousand, eighty, about 5 what I'm making now. 6 You know, 23 years and not -- working for 7 yourself, you don't know. You know, it's not like 8 you have to go in and explain, well, I'm not very 9 good with numbers and I'm not very good with this 10 and I'm ADHD and I'm dyslexic, but I do know that 11 creative directors notoriously are eccentric and 12 are -- you know, like I said, I just saw a job 13 yesterday or the day before yesterday that I 14 thought, oh, man, this would be awesome, but it's 15 in Chicago. 16 You know what I mean? And I'm like, oh, 17 would they do it remote? And I'm friends with all 18 these agencies I would love to work for, but they 19 are peers. You know, they do what I do, so they 20 own their own agencies, and maybe they would hire 21 me. I don't know. 22 Q What would your job be if you were to get another 23 job? 24 A I'd like it to be a creative director or something 25 like that.</p>	<p style="text-align: right;">Page 68</p> <p>1 Q How much do creative directors earn? 2 A I think the average, the national average is like 3 around 108 if you go to like Indeed or something 4 like that. It just depends on the region you're 5 in. 6 Q Do you agree that you could make 108,000? 7 A I think in our offer I'm willing to state that I 8 can make 100 for sure. 9 Q Why are you stating a number lower than what 10 you've been looking at? 11 A I said I'm looking at a number that I've been 12 paying myself, right, that I thought, you know, so 13 I don't know. 14 Q Do you think that you're capable of making more 15 than what you're paying yourself? 16 A I don't know, honestly. I think it's like 17 anything. Until you try, you don't really know 18 your value. It's like your value is only what 19 somebody is willing to pay you. 20 So I realize that -- you know, and that's 21 vocational. We wanted vocational evaluations on 22 Allie and I, but we couldn't find anybody to do 23 it, and so I looked at what we were paying and I 24 looked at the history of what I had been paying 25 myself, and I felt that was a reasonable number</p>

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1 for me to commit to.

2 Now, if the company continues to falter,

3 then I've got to go get a job, and maybe I'll use

4 proceeds, you know, and I'll have money from the

5 house sale, you know, hopefully, but I'm not going

6 to let my kids be without.

7 (Exhibit 3 marked.)

8 BY MS. MILFELD:

9 Q I am showing you what is marked as Exhibit 3.

10 Exhibit 3, Charlie, is the income valuation dated

11 March 28th, 2023.

12 Have you seen this?

13 A Yeah, I did. Like I said, you know, what he came

14 up with, you know, it's \$15,000 different than

15 what my paycheck has been. I have never -- my

16 paycheck has always been 98.5. Right? That's

17 always been my paycheck. That's what's on my W-2,

18 whatever. I mean, that's what's on my whatever.

19 But then I realized when I saw this number

20 that Allie was doing something in the books beyond

21 what my paystub would say, and that's how it ended

22 up growing higher, right? So that was the number

23 that was very confusing to me when I saw it.

24 And it says hers is 32,498, but I know in

25 ADP it's 35,000. So I was told by my wife that we

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1 we offer you 100 and you come back at 110 or

2 whatever for my salary, I'm not going to argue

3 over that kind of crap.

4 Q Is there any other reason besides you saying that

5 your paycheck was different than Jeremy's number

6 why you disagree with the 115,000 income?

7 A Ask the question again.

8 Q Besides your paycheck being different, is there

9 any other reason or reasons why you disagree with

10 Mr. Harkness's income for you for 2022 being

11 \$115,620?

12 A Well, I'm looking at this right here what you just

13 gave me. In 2022 it says my salary was 106 and in

14 2021 it says 127 and Allie's at 43. So again

15 these numbers, how they -- like 2022, I don't

16 understand how her number went from 43 to 33,

17 right?

18 And so these are questions that I would

19 have for Jeremy. Where did those numbers come

20 from? And remember that, you know, what's always

21 been the biggest challenge for me and, you know,

22 the person that benefits the most by having me

23 have a higher salary is the one submitting the

24 numbers and the one that keeps the books and the

25 one that's, you know, doing all that. So again,

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1 lived off of 98.5 plus 35, and that was 133.5 and

2 I always thought that was what we were paid.

3 Look, Allie didn't even have a salary, and

4 the only reason she started taking a salary was

5 for insurance, and I didn't even -- you know,

6 again, for years, for years it wasn't about salary

7 at all. It was we took what we could. We had

8 skipped months all the time. So Jeremy's number,

9 that's fine. I mean, again, it is what it is.

10 Q Do you agree with Mr. Harkness's conclusion that

11 your income in 2022 was \$115,620?

12 A I can't comment on that. I'm not sure. I'm just

13 telling you, no. I thought my salary was 98.5 so

14 I don't agree with it. Now, will I look into

15 seeing exactly how he came up with that number?

16 Sure.

17 Q Have you not looked into how he came up with the

18 number?

19 A Again, I told you that I spend as -- I just don't

20 know why. You know, like I said, I don't have the

21 expertise at understanding all this stuff. I

22 don't have a lot of time.

23 I'm trying to make the money that I need to

24 make and, you know, it's hard. And so I'm not

25 saying that I'm not going to die on the sword. If

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1 am I going to challenge it? I'm trying not to,

2 but do I know my wife is capable of it?

3 Absolutely.

4 Q Did you read Mr. Harkness's determination of

5 income and how he arrived at the 115,000?

6 A I'm trying to remember. I'm sure I read it, but I

7 don't remember where. I can read it now.

8 Q Let me ask you this, Charlie. Would you agree

9 that your income is variable?

10 A No, I didn't know it was. No, I never thought it

11 was variable. I thought it was a set salary.

12 Sorry.

13 Q What do you think your current income at

14 Tool Studios is today?

15 A 98.5.

16 Q What are you basing that on?

17 A My ADP, my paycheck.

18 Q Why do you think nothing else should be included

19 in your income?

20 A Because that's -- that's what we can afford. If I

21 have 98.5 and she has 35 and it goes into our

22 personal checking account, that's what we have to

23 live off of.

24 And actually I can tell you that recently

25 in the last six months we had to skip a paycheck

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1 too in order to keep us from going any deeper in
 2 the negative numbers, so I'm paying myself too
 3 much right now personally is what I think.
 4 Q **If you look at page 2 of 2, Mr. Harkness talks**
 5 **about how he added back things like tax basis**
 6 **depreciation, took out a provision for economic**
 7 **depreciation, personal expenses were added.**
 8 **Do you agree with that process?**
 9 A I'm sure I could pay somebody a lot of money to
 10 translate all this stuff for me, but I kind of
 11 look at things in a simple thing.
 12 He says 115,000, right, I should make. He
 13 thinks that's my salary, but then I apply it today
 14 or I apply that amount of money over the last
 15 three years, and it's too much. There's not
 16 anybody that wouldn't contest that it's too much,
 17 so how he thinks I can pay myself that amount,
 18 you know, maybe I can.
 19 You know, like I said, that's why if I
 20 removed all the personal expenses out of the
 21 books, then I would be able to say -- removed all
 22 the stuff that is not going to be there anymore,
 23 right, and I looked at that and I was like, oh,
 24 shit, oh, I can probably pay myself more. Do you
 25 know what I mean?

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1 there anymore when Allie leaves.
 2 Q **When you said that the company would be losing**
 3 **less, what was the number that you came up with?**
 4 A I didn't come -- I just said I don't know. I said
 5 logically it makes sense, but if I'm not paying
 6 for all of Allie's personal stuff then there will
 7 be -- the company won't be showing a negative
 8 number or not a bad negative number, do you know
 9 what I mean, or I could potentially flip -- and
 10 that's the same way with me subleasing the
 11 company, right, subleasing the office and trying
 12 to get out of this \$40,000 a year commitment,
 13 right? 40,000, well, we lost 40,000. If I can
 14 run the company without the office then, shit, I
 15 probably can make more, and so I am trying to do
 16 those things, to pay for the legal fees and leave
 17 some money in the bank. I know it's a long-winded
 18 answer.
 19 Q **Do you think it's appropriate that Mr. Harkness**
 20 **opined on your income in Exhibit 3 by relying on**
 21 **2021 and 2022?**
 22 A I guess my big question is, you know, and what I
 23 don't understand and maybe you can answer this,
 24 but my big question -- all right. Well, I'll
 25 answer your question. No, I don't know. I really

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1 I just don't -- right now I know I'm paying
 2 myself too much because the company is losing
 3 money forgetting about all the attorney's fees.
 4 So that's my logic, that's my reasoning, and again
 5 if you keep paying yourself more than you have,
 6 eventually you're going to run out of money.
 7 Q **Have you done the calculation without attorney's**
 8 **fees or the expenses that you're --**
 9 A Again --
 10 Q **Just let me finish the question for the reporter.**
 11 **Have you done a calculation of whether the**
 12 **company would be losing money if you took out**
 13 **attorney fees and other expense that are unique to**
 14 **the divorce?**
 15 A Would the company be losing money? Yeah, I did,
 16 and it would be, not a lot because of this new
 17 client right now, not a lot, and possibly I could
 18 pay myself more, and that's what I was saying.
 19 We would know a lot better if we could
 20 remove all those expenses out, and that's what we
 21 tried to do when we got the first report was then
 22 I could project and say, oh, shit, oh, shit, I'm
 23 fine making 120,000, and I didn't realize it. Do
 24 you know what I mean? But I didn't know how much
 25 personal shit was coming out, and that won't be

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1 don't know.
 2 Q **Why don't you know?**
 3 A Because the books are -- like I said, I can't -- I
 4 don't know what is personal and what's business,
 5 and that's really what it's all come down to for
 6 me when it comes to -- maybe it doesn't matter at
 7 all, but it certainly makes a lot of logical sense
 8 to me.
 9 Q **On June 28th there is a large invoice for around**
 10 **86,000. Was that for TelyRx?**
 11 A Uh-huh.
 12 THE COURT REPORTER: Pardon?
 13 Q **If you could answer "yes" audibly.**
 14 A Yes. I'm sorry. Yes.
 15 Q **When did you start working with TelyRx?**
 16 A What was the date on that one? You said the big
 17 86,000 was in June?
 18 Q **The \$86,000 invoice was on June 28th. When did**
 19 **you start working --**
 20 A Oh, that's just right now, yeah. Two months ago.
 21 Q **Do you have a retainer for this client?**
 22 A Uh-huh.
 23 Q **How much is the retainer?**
 24 A 60,000. No, 50,000.
 25 Q **Has any of the 86,000 been paid?**

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1 A No, not yet, but I'm expecting it any day.

2 Q **Have you already gone through the retainer?**

3 A I don't get billings from my one team that's

4 handling the majority of this, but yeah, they're

5 definitely working against it for sure right now.

6 Q **Who is part of this team?**

7 A Steven Kidwell. He's an individual out of

8 Florida, and he has some offshore guys that I

9 don't even know who they are, but I pay him, and

10 then I have another freelance person that's been

11 with me for a long time.

12 Her name is Jessica, and then her son is

13 also helping. My son is now helping which is

14 great so he's able to make some money for college,

15 so that's my team and me and Tara. Sorry. Five

16 of us.

17 Q **For work that you do is it typical that you**

18 **assemble a team for a project?**

19 A Uh-huh.

20 Q **Is that a "yes" for the --**

21 A Yes. I'm sorry. Yes. Yes. It is a team of one

22 sometimes or a team of five.

23 Q **Do you have any additional work with TelyRx?**

24 A No.

25 Q **Is the work done with TelyRx?**

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1 **opinion about a different value of Tool Studios**

2 **and your income?**

3 A No.

4 Q **Are you planning to retain an expert to rebut --**

5 A No.

6 Q **And just so I can finish the question.**

7 A Yeah. I'm sorry.

8 Q **Do you plan on retaining an expert to rebut**

9 **Mr. Harkness's reports?**

10 A I don't know.

11 Q **Why don't you know?**

12 A I haven't even thought of it. I didn't even know

13 you could.

14 Q **When you started the company did anyone contribute**

15 **any funds?**

16 A Yeah, my mother.

17 Q **What is your mother's name?**

18 A Joyce Bell.

19 Q **Did anyone else contribute funds when the company**

20 **started?**

21 A Not when it started.

22 Q **Did anyone else contribute funds at any other time**

23 **to Tool Studios?**

24 A Yeah. We had met with bankruptcy attorneys twice

25 and we had a line of credit that the bank called

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1 A No, no, no. We're still in progress. We're

2 supposed to launch August 1st, but we're not going

3 to make that, so it will go over probably I'm

4 thinking the end of August is what I think the

5 contract will end.

6 Q **How much do you expect to earn from this client**

7 **TelyRx?**

8 A 20 percent. 20 percent of the billings, so let's

9 just say 150,000. If we bill 150,000, we will

10 make whatever that number is, 30,000.

11 Q **Is \$50,000 a normal retainer amount?**

12 A No. No. 4,000 is typical when I've done it in

13 the past, but I don't do retainers, very rarely.

14 Q **Would you consider TelyRx to be a bigger client?**

15 A Oh, I would say they are probably the top ten

16 clients of my career.

17 Q **Do you expect to get more clients like TelyRx?**

18 A You know, like I said, if I look at my career,

19 21 years, I've gotten maybe six or seven clients

20 like that, so I would say I can't predict that

21 one.

22 Q **Do you have a rebuttal valuation?**

23 A What's a rebuttal valuation?

24 Q **Are you going to use or have you used a person to**

25 **look at Jeremy Harkness's reports and give you an**

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1 and we were ready to go under, and my best friend

2 called Allie and offered her a line of credit

3 because he knew I wouldn't take it. Anyway, he

4 bailed us out at \$109,000.

5 Q **Who is your best friend?**

6 A Mark Grylicki.

7 Q **When did Mark Grylicki give you 109,000?**

8 A 2009. A five-year term loan, and we paid him back

9 every penny and 2 percent interest.

10 Q **Besides your mother --**

11 A And my father gave us 100,000. At one point we

12 were doing really bad, and then we paid him back

13 as well. In 2020 we finally paid him back, and he

14 gave us that 100,000 in 2005 probably, and we paid

15 it off finally in 2020.

16 Q **Anyone else?**

17 A I'm trying to think. No.

18 Q **How much money did your mother contribute?**

19 A 50,000.

20 Q **How did it come about that she gave your company**

21 **50,000?**

22 A Her father had just passed away -- her mother had

23 just passed away and left her some money, and I

24 had been working for another agency and then there

25 was problems with their financials and some

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1 corruption.

2 And we tried to -- my dad and I tried to

3 help the company out, but anyway it was just my

4 time to potentially try to start my own company

5 because I had worked for other people, and I

6 talked to my mom and my sister, and my mom said,

7 well, I have this money. And I said okay, and I

8 gave her 10 percent of the company for that

9 50,000.

10 Q How did you decide to give her 10 percent of the

11 company?

12 A I don't know. It was probably just what I thought

13 was fair at the time.

14 Q Did you believe the company to be worth 500,000?

15 A No. You know, the joke was I was going to buy her

16 a pink Cadillac, and she always told me that when

17 I made it big I was going to buy her a pink

18 Cadillac, and yesterday I had to tell her she

19 can't drive anymore.

20 Q Did your mother ever contribute anymore funds than

21 the initial 50,000?

22 A No.

23 Q Did your mother relinquish her ownership in the

24 company in October 2021?

25 A Uh-huh.

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1 she still owned the company and we had paid I

2 think 23,000 or 22.5 already, and so we said 500.

3 My sister recalls that we agreed to 500 for

4 life or until 50,000 was paid back. That's what

5 my sister who manages my mother's money said that

6 that was the agreement, and then all I did was

7 said 500 for life because her life expectancy I

8 didn't think -- you know, she will be 87, but

9 she's in good health, but she's deteriorating.

10 Q Do you agree that you have paid your mother

11 \$31,423 as of this date? Does that sound right to

12 you?

13 A I thought it was lower than that, but I'm sure if

14 that's what Allie says, I'm sure that would be

15 easy to track, so yeah.

16 Q Would you characterize your payment to your mother

17 as a debt repayment or a gift?

18 A Well, we had to treat it -- we had to start paying

19 it out of our personal instead of the business

20 because of the way it was done, and that's all I

21 can tell you.

22 So it's a personal debt that Allie and I

23 carry that we pay \$500 a month from our personal

24 checking account, not the business. We used to

25 pay it from the business, but then we were told we

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1 Q If you could say audibly for the record --

2 A Yes, yes, yes.

3 Q Why did your mother relinquish her 10 percent

4 ownership?

5 A I was worried because of the losses that we had

6 been incurring, and I talked to my sister and I

7 didn't want any liability on my mother, and we

8 agreed that we would pay her \$500 a month for her

9 life if she would give back the 10 percent, and so

10 we had that drawn up, and I became a hundred

11 percent owner of the company at that time.

12 Q When you said "we had that drawn up," who is we?

13 A Biff Warren took care of it, Attorney Biff Warren.

14 He's Allie's employer too.

15 Q How is he Allie's employer?

16 A He owns a newspaper, the Left Hand Valley Courier,

17 and that's her one part-time job that she gets

18 paid \$1,200 a month to do and he owns the

19 newspaper, and he also owns Warren Carlson.

20 Q How did you come up with \$500 a month for the rest

21 of your mother's life?

22 A I pulled it out of my ass. I don't know.

23 Q Did you factor in your mother's life expectancy?

24 A Probably. You know, the goal that -- we had paid

25 her back -- we started the \$500 a while ago when

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1 can't do that anymore after she gave us the

2 10 percent back.

3 Q Who told you that you couldn't pay your mom out of

4 your business account anymore?

5 A The accountants.

6 Q Which accountants?

7 A And Biff, a lawyer. Lawyer Biff Warren and then

8 the accountant, and his name is David Black.

9 Q In your sworn financial statement you listed your

10 debt to your mother as \$28,077. How did you

11 calculate this number?

12 A That was 50,000 less what we had paid at that

13 time.

14 Q How long has Alyson worked as a bookkeeper for

15 Tool Studios?

16 A 23 years. We started in 2001.

17 Q Would you call this a full-time or a part-time

18 job?

19 A Part-time.

20 Q How many hours a week does Alyson work in any

21 capacity for Tool Studios?

22 A I do not know. I did try to ask her to track her

23 time because I felt that was very important for me

24 to be able to replace her, and she refused.

25 Q How do you not know how much Alyson works a week

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<p style="text-align: right;">Page 85</p> <p>1 for Tool Studios?</p> <p>2 A Because she has refused to tell me and track it.</p> <p>3 We have -- all my employees track their time. Why</p> <p>4 she chooses not to --</p> <p>5 Q When did you ask Alyson to track her time?</p> <p>6 A I have asked several times.</p> <p>7 Q Have you asked her recently?</p> <p>8 A Yes.</p> <p>9 Q When was the last time you asked her?</p> <p>10 A Oh, probably two months ago.</p> <p>11 Q What was Alyson's response?</p> <p>12 A No response even though I gave her instructions</p> <p>13 and I sent all that. She just ignores it.</p> <p>14 Q When you said you gave her instructions, how did</p> <p>15 you send the information to her?</p> <p>16 A I set her up in this tracking system called</p> <p>17 Base Camp and I gave her notes on how to enter her</p> <p>18 time and asked her if she would do it so that I</p> <p>19 would understand how I need to replace her.</p> <p>20 Q Alyson didn't respond?</p> <p>21 A Nope.</p> <p>22 Q Or didn't do anything?</p> <p>23 A Didn't do anything.</p> <p>24 Q Did she ever tell you, "I'm not doing this"?</p> <p>25 A I can't recall.</p>	<p style="text-align: right;">Page 86</p> <p>1 Q Do you remember her ever telling you, "I'm</p> <p>2 refusing to track my time"?</p> <p>3 A No.</p> <p>4 Q Other than Tool Studios, you mentioned the</p> <p>5 newspaper that Alyson worked for as well as a</p> <p>6 woman named Rebecca?</p> <p>7 A Yeah, Rebecca Folsom, yeah, a musician.</p> <p>8 Q What work does she do for Ms. Folsom?</p> <p>9 A She does everything from e-mail blasts to poster</p> <p>10 design to event coordination. She just had this</p> <p>11 big event that she did, and Allie made good money</p> <p>12 for two months. Event coordinating. She works</p> <p>13 with CD Baby, works with a lot of different</p> <p>14 things, and it used to be a collaborative with me</p> <p>15 doing design and her handling all the</p> <p>16 administration, but then she took it over.</p> <p>17 Q What is CD Baby?</p> <p>18 A CD Baby is just where you submit your albums to --</p> <p>19 where you submit your work to. It's just a</p> <p>20 third-party company that handles distribution of</p> <p>21 albums and digital downloads.</p> <p>22 Q What you're saying is Alyson works for Ms. Folsom</p> <p>23 and helps her with CD Baby?</p> <p>24 A No. I am saying Allie has worked for Ms. Folsom</p> <p>25 for a long time, and she has done everything from</p>
<p style="text-align: right;">Page 87</p> <p>1 coordinate photo shoots to CD releases. Rebecca</p> <p>2 is very known in this area and has six or seven</p> <p>3 albums. Design work, e-mail blasts.</p> <p>4 She does everything that I do for other</p> <p>5 clients, but it's the one client that she's a part</p> <p>6 of with this women's group called the Goddesses,</p> <p>7 and Rebecca is one of the primary Goddesses, and</p> <p>8 so Allie has taken that client on, and after we</p> <p>9 divorced she took all the files and she now</p> <p>10 manages that along with some other clients of ours</p> <p>11 as well and she does design work for them. She</p> <p>12 does other stuff for those guys as far as</p> <p>13 volunteer work. She does a lot of volunteer</p> <p>14 stuff.</p> <p>15 Q To your knowledge, name all the place that you</p> <p>16 believe Alyson works for.</p> <p>17 A All the places?</p> <p>18 Q All the companies she works for besides</p> <p>19 Tool Studios.</p> <p>20 A Rebecca Folsom. The Rock & Rails which I think is</p> <p>21 done through Niwot Arts Association or Niwot</p> <p>22 Community Association, so she does a lot of work</p> <p>23 for them.</p> <p>24 She does work -- she does Christmas cards</p> <p>25 for a couple people. I'm not sure who those are.</p>	<p style="text-align: right;">Page 88</p> <p>1 She works for her friend Dierdra doing event</p> <p>2 planning.</p> <p>3 I know they do a holiday party every year</p> <p>4 for Country Day or for Boulder Country Day</p> <p>5 schools. I think it's a real prestigious school</p> <p>6 in Boulder. I don't know much about it, but I</p> <p>7 know they do this massive event and Allie has gone</p> <p>8 for a while. I'm trying to think who else. And</p> <p>9 she picks up small jobs here and there.</p> <p>10 Q Does she run any of her income through</p> <p>11 Tool Studios?</p> <p>12 A Rebecca's she does.</p> <p>13 Q Why does she run her income from work with Rebecca</p> <p>14 through Tool Studios?</p> <p>15 A I think she does it to justify, you know, her</p> <p>16 35,000 salary. I don't know. I mean, it was her</p> <p>17 company, so I don't know why she wouldn't run all</p> <p>18 her stuff through the company.</p> <p>19 Again, it's a weird question because it's</p> <p>20 work. That's what we do. She runs all the money</p> <p>21 she makes through the company or at least I think</p> <p>22 she does.</p> <p>23 Q How many hours a week does Allie work between all</p> <p>24 these jobs that you just mentioned?</p> <p>25 A You know, I did a calculation of it. Rebecca came</p>

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<p style="text-align: right;">Page 89</p> <p>1 to like -- after I did the math, but I asked Allie 2 several times on this what she's billing an hour 3 because she only does fixed fee, and so I don't 4 know what she is charging per hour, and like I 5 told you guys, it's how I've always looked at 6 value. 7 So my best guesstimate that Allie was 8 working with everything maybe 20 hours a week 9 between Tool and Rebecca Folsom averaging is my 10 guess, but I did have some -- if I knew what her 11 hourly rate was with Rebecca I know we could 12 figure that out very easily at least how many 13 hours because I know she bills Rebecca hourly. 14 Q So you're saying that through all of the jobs 15 including Tool Studios Allison works about 16 20 hours a week? 17 A Yeah. Yep. And I think his salary, he assigned 18 didn't he say something like 18,000 a year for 19 what her job was for Tool as far as bookkeeping 20 goes. Now, she does more than bookkeeping, but I 21 think he associated that to \$18,000. 22 Q How many hours a week does Alyson work for just 23 Tool Studios? 24 A Like I said, I don't know. She won't track her 25 numbers. I don't know. I know Jeremy put 18,000,</p>	<p style="text-align: right;">Page 90</p> <p>1 so 18,000 divided by \$35 an hour maybe? I don't 2 know what -- 3 Q How much money do you think Alyson can earn and in 4 what capacity? 5 A I definitely think Allie is worth more than I am, 6 but understanding her, I think 60,000, and 7 honestly, I think she has turned down jobs because 8 of this divorce. 9 Q What jobs do you think she has turned down? 10 A I don't know, but I know she definitely talked to 11 Peggy Shell, one of our friends that owns a 12 placement agency that places people with Allie's 13 skill set. 14 I know that her best friend Karen Haran who 15 is a world-class writer has offered to help her 16 with her LinkedIn and has helped her with her 17 resume and offered to help her, and she has not 18 done anything with that at this point. 19 Q When you say \$60,000, what job are you thinking 20 that Allie can have? 21 A I think she could do a lot of different things, 22 and like I said, if you go to Upwork it could be a 23 combination of things, but I think she's a 24 world-class account executive. 25 I think she would be an incredible personal</p>
<p style="text-align: right;">Page 91</p> <p>1 assistant, so account executive, personal 2 assistant or work at one of these big event 3 coordinating companies. You know, she's masterful 4 at the details, masterful. 5 Q What evidence are you relying on to support your 6 belief that Allie can make \$60,000 as an account 7 executive or personal assistant? 8 A It's what I pay her in part and what I know other 9 people pay people with her skill set in my 10 industry and with companies that I work with all 11 the time. What do you pay? What are you paying 12 her? What? That's ridiculous. You know what I 13 mean? 14 So I know her skill set. I know tomorrow I 15 could call three companies and say would you 16 interview Allie, and probably one of them would 17 offer her a job, so that's why. Allie, she 18 undervalues herself. She always has, and she will 19 admit to it. She is her worst enemy due to the 20 issues that I have explained in the past, 21 you know. 22 Q How is she her own worst enemy in the job context? 23 A If you live your life not feeling you are good 24 enough, then you don't think you can do things 25 that you actually can, and that's all I can tell</p>	<p style="text-align: right;">Page 92</p> <p>1 you. 2 Q Do you think her undervaluing herself or thinking 3 she's not good enough would make it difficult for 4 her to earn 60,000 a year? 5 A No. I think like I said, you know, a great 6 example is the job she took, you know, with the 7 newspaper. She was so nervous about it. 8 She wouldn't even -- she took the job 9 before she even knew what it paid. And I was 10 like, Allie, you can't take a job if you don't 11 know what you're going to get paid. Well, they'll 12 pay me whatever. I'm really scared. 13 But she rose to the occasion, and I 14 guarantee you that that company, Biff Warren that 15 owns the newspaper will just rave about her 16 abilities. She just is great at it, you know, and 17 project management. If you guys saw my 50th 18 birthday party you'd be like holy shit. I'm 19 sorry, but she's spectacular at it, and I will 20 never undervalue her. I never have. I have 21 thanked her every day prior to our divorce for all 22 she does for me. 23 Q Do you think it is beneficial for Camryn that 24 Alyson have flexibility in her schedule? 25 A I do. I think it's important for both of us to</p>

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1 have that flexibility, but Camryn is going to be
 2 14. Camryn is independent. Camryn, you know, can
 3 survive alone if they need to, and they need both
 4 parents.
 5 And I think, you know, that's the hardest
 6 part for me about taking a 9 to 5 type of job is
 7 because of my children because of the flexibility
 8 I want to have.
 9 Remember you guys agreed to 50/50 custody.
 10 That's the goal, and that means we both need to be
 11 flexible with our schedules, so I do agree with
 12 that for both parties, and that's why I mentioned
 13 Upwork for Allie is that I think she could make 60
 14 or more if she just tried.
 15 Q When you were talking about Peggy Shell, how do
 16 you know that Peggy offered to help Alyson get a
 17 job?
 18 A I just know.
 19 Q How do you know? Did someone tell you? Did you
 20 read it in an e-mail?
 21 A Yeah, somebody told me.
 22 Q Who told you?
 23 A Peggy.
 24 Q When did Peggy tell you?
 25 A I don't remember.

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1 Q You're saying Carol Glassman lies?
 2 A Carol Glassman lies.
 3 Q What does she lie about?
 4 A She lied about the biggest thing is recently the
 5 parental -- the reunification subsidy.
 6 Q What did she lie about regarding the subsidy?
 7 A She used the document, so we agreed to
 8 reunification after Carol proposed it. I read all
 9 the contracts, and it stated very clearly that
 10 reunification was a process where she would come
 11 in and look at the family unit, the parents, and
 12 that she would make recommendations and that those
 13 recommendations we would have to follow.
 14 So if Jill, the reunification therapist,
 15 said you know what? You need to really see
 16 somebody. You know, you're really causing damage,
 17 your permissive parenting, whatever, then it would
 18 be up to Allie to comply, period, the end.
 19 Allie agreed to it in a contract with Jill
 20 as part of the process of signing up with Jill.
 21 Then in the parenting plan there was a reference
 22 to something that I wanted to secure that power
 23 for Jill, and I sent an e-mail to Allie and Carol.
 24 And Carol responded to me and said how
 25 about this? This is a document that John and I

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1 Q Did you --
 2 A I don't know.
 3 Q If you could just let me ask --
 4 A No, I'm trying to think. Let me just think how I
 5 know. I know I talked to Peggy, but I don't know
 6 if she told me at that time. Probably an e-mail.
 7 Q How do you know that Allie refused Ms. Shell's
 8 help?
 9 A I don't know for sure, but she doesn't have a job
 10 and she doesn't have a LinkedIn profile, and these
 11 are all things that I know Peggy would tell her to
 12 do and get ready, so she doesn't have any of those
 13 things, so that's all I can tell you.
 14 (Exhibit 4 marked.)
 15 BY MS. MILFELD:
 16 Q I am showing you what is marked as Exhibit 4.
 17 When you said in this e-mail to myself,
 18 Nelissa Milfeld, and Carol Glassman that
 19 Peggy Shell offered to help Allie got a job, but
 20 Allie refused her help after Carol told her not to
 21 get a job, one, is that true?
 22 A It's my assumption, so that was probably out of
 23 line. It's not a fact. The Shell thing I think
 24 is. What Carol told her, you know, look, Carol
 25 lies is all I can tell you.

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1 received from Jill that stated in this contract
 2 she said in her e-mail, and I have the e-mail, she
 3 said in her e-mail that here is a document that
 4 Jill wrote that I have not modified at all, so it
 5 is just agreeing to what Jill originally stated.
 6 And in that document it said "minor child
 7 and father." And I had known that there was no
 8 way that it would ever say that, and then I
 9 requested the document that she referred to that
 10 she said was not changed from Jill. I got that
 11 document back, and it clearly said "parents and
 12 minor child."
 13 It was absolutely edited. We sent it back
 14 with those corrections, and Carol accepted it, no
 15 problem. So she lied in her e-mail and she
 16 manipulated the document that she referred to, so
 17 I don't trust Carol. I don't trust Allie. So do
 18 I think she told her not to get a job? Possibly.
 19 Q Do you have any evidence that Carol told her not
 20 to get a job?
 21 A No, I don't, but she doesn't have a job, so tell
 22 me why. And Peggy Shell -- I mean, I'll call.
 23 Look, I'll be glad to call Peggy Shell, she's a
 24 friend of mine too, and ask her point-blank if you
 25 want me to.

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1 Look, like I said in that e-mail, I just
 2 want an effort. I'm not trying to be brutal or
 3 mean or whatever. You know, what Carol did with
 4 that document was horrible. It is what it is. I
 5 want to move on.
 6 MS. GOFF: How much longer?
 7 MS. MILFELD: Do you want to take a
 8 lunch break?
 9 THE WITNESS: No.
 10 MS. GOFF: No, I want to finish.
 11 MS. MILFELD: I think it's going to be a
 12 bit longer.
 13 THE WITNESS: Well, why?
 14 MS. GOFF: Why don't you just answer the
 15 questions and not say so much.
 16 THE WITNESS: Sorry. All right. Ask me
 17 the questions.
 18 BY MS. MILFELD:
 19 Q Do you know whether Allie refused Peggy Shell's
 20 help?
 21 A No.
 22 MS. GOFF: Asked and answered.
 23 A No.
 24 BY MS. MILFELD:
 25 Q In this e-mail you stated that you would like to

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1 A I told you why. I've already addressed that.
 2 Q You haven't said why you think she needs a
 3 psychological evaluation.
 4 A It's the same thing, an assessment to evaluate if
 5 she in fact is harboring unresolved trauma based
 6 on abuse of her childhood.
 7 Q Why does it matter in the context of this divorce
 8 whether she has --
 9 A Like I told you --
 10 Q Hold on. Just let me ask the question.
 11 Why does it matter in the context of this
 12 divorce whether or not she has unresolved trauma?
 13 A Why does it matter? It matters because the
 14 decisions she is making are very expensive, and
 15 \$85,000 in legal fees to this point is why.
 16 That's not normal. People don't just run away and
 17 quit communicating and ignoring things. That's
 18 why I wanted it evaluated.
 19 Q You want her evaluated --
 20 A And because of the damage it has caused my kids.
 21 Q What damage do you think she has caused her kids?
 22 A I think permissive parenting and transgenerational
 23 trauma is very damaging to kids, and I can show
 24 you plenty of reports and documents and all that
 25 in regards to support that, you know.

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1 get a vocational expert for both you and Allie?
 2 A Agreed. Yep.
 3 Q Do you still believe this?
 4 A I think it would be helpful.
 5 Q Why do you think you need a vocational assessment?
 6 A I'd like to know my worth. I don't even know the
 7 process, but I would love to have somebody come in
 8 and say, hey, look, I think you could make 150,000
 9 or 200,000. That would probably help me, but I
 10 don't think they would. I think it would be right
 11 in what I told you based on the research I have
 12 done. It would be right in that hundred-thousand
 13 range.
 14 Q Why would you want a vocational assessment if you
 15 think they would come back with what number you
 16 agree with?
 17 A I wanted to be fair. I think it's unfair of me to
 18 say, Allie, you need a vocational evaluation, but
 19 I don't. I thought that was fair is why I
 20 suggested it. That was it. The same with the
 21 psychological evaluations I've wanted since day
 22 one. I offered it for myself and I've asked Allie
 23 for it.
 24 Q Why do you think Allie needs a psychological
 25 evaluation?

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1 You know, telling your kids, "I should have
 2 left your dad seven years ago. I'm so sorry."
 3 You don't think that fucking doesn't damage your
 4 kids and the relationship with their father?
 5 Whatever, you know.
 6 Q So besides --
 7 A And the numbers.
 8 Q Let me ask the question. Let me ask the question.
 9 Besides generalities you just said, "I want
 10 Allie to get a psychological evaluation because of
 11 the impact her unresolved childhood trauma has had
 12 on the children."
 13 A On the children and the business.
 14 Q Okay. Let's take one at a time. What impact has
 15 her unresolved childhood trauma had on the
 16 children?
 17 A I'll e-mail you the document.
 18 Q What document are you referring to?
 19 A I don't necessarily need to go down this path
 20 unless you guys want to go down this path. I'm
 21 not telling Allie whatever. I'm just telling you
 22 that these are my beliefs, and they're supported
 23 by a lot of things, and that's why we have
 24 reunification therapy in place.
 25 And if there is things happening, then

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<p style="text-align: right;">Page 101</p> <p>1 reunification will discover it, and at that point 2 then it will become an issue or not an issue. But 3 right now she is required based on the contracts 4 we have signed to follow the directive of a 5 reunification therapist, and I do know that the 6 reunification specialist will be talking to all of 7 our therapists, and at that point it will either 8 be presented to the courts or not.</p> <p>9 Q What document are you referring to? You didn't 10 answer my question.</p> <p>11 You said there is a document that I can 12 e-mail you that talks about the impact that 13 Alyson's unresolved childhood trauma has had on 14 the children.</p> <p>15 A Yeah. It's a document that I have that I 16 have worked with specialists to draft. It's a 17 dialogue. It explains exactly certain instances 18 throughout our 20-year marriage that have caused 19 issues with my children that exist today.</p> <p>20 So it's a document that if and when I need 21 to use it, I'll use it, but I don't -- right now 22 the only people that have seen it are the 23 reunification specialist and my therapist. It's 24 my story. It's my examples. It's my, you know, 25 book per se.</p>	<p style="text-align: right;">Page 102</p> <p>1 Q When did you first start creating this document? 2 A I've been working on it for three years. 3 Q Was this your idea or someone else's idea for you 4 to create this document? 5 A No, it was like I said. Look, when you have 6 somebody come to you that you love and adore and 7 care for that you know has had a horrendous 8 childhood and has had so much death and so many 9 things, and they come to you shaking and they say, 10 "I think I was sexually abused by my father," you 11 don't take that too lightly. 12 And that set in motion for me understanding 13 it, and I've been a specialist, you know, on the 14 sexual abuse team at Boulder County. I've been a 15 corrections specialist with juveniles. I have 16 worked with kids for eight years before this 17 career. 18 So I understand the impact of our past into 19 our present, and I started to journal and I 20 started to try to put pieces together. And at the 21 same time, you know, my own mental health, you 22 know, being a late diagnosis of ADHD came into 23 play. 24 And that's how this document came to be, 25 and it came to be trying to understand all that</p>
<p style="text-align: right;">Page 103</p> <p>1 was happening in my family, that was happening 2 with my wife, and why I started to discover the 3 freeze and the lack of communication and the 4 manipulation and cherry-picking and all these 5 different things that had been occurring.</p> <p>6 And that's when I asked that we go into 7 therapy, this program called EFT, and EFT is 8 designed to bring to the surface the true cause of 9 conflict within any marriage, but also with 10 people, and that's when it started to happen and 11 it came up, and we had two choices.</p> <p>12 She either would -- I knew she would either 13 fight and flight or, you know, she would get help, 14 and she shut down and ran, and that's all I can 15 tell you.</p> <p>16 So that's why the document existed. It was 17 a way for me to understand everything. It was a 18 way for me to have certain things translated. It 19 has been an accumulation of a long time, and it's 20 the core of all this shit. You know what I mean? 21 That's why that document exists.</p> <p>22 Q Did you first form the belief that Alyson suffers 23 from complex PTSD when she talked about her father 24 potentially abusing her or was that a different 25 time?</p>	<p style="text-align: right;">Page 104</p> <p>1 A No. The complex PTSD is more recent. Unresolved 2 trauma has always been there, and again it's 3 really difficult because neurologically, you know, 4 in your mind you do everything you can to block 5 those emotions and to block anything to block out 6 what happened as a child, so you will do and say 7 anything in order to keep that from surfacing.</p> <p>8 Q When did you first form the belief that Alyson 9 suffered from unresolved childhood trauma? 10 A Fifteen years maybe. 11 Q Why did you think that she was suffering from 12 unresolved childhood trauma? Was it something 13 that she did? Were you seeing symptoms? 14 A Yeah. I mean, it was all that. It's like you 15 said. You know, Allie is without empathy for me, 16 and that became more and more apparent over the 17 years, and it became more and more, you know, that 18 she was guarding not only herself, but she was 19 also guarding the children, right, because they 20 represent her in all ways. 21 And that's where permissive parenting comes 22 into play and parental alienation and all these 23 things that really led me to go on this quest to 24 try to get help, and it was -- I don't want to say 25 it was manipulative, but I was trying to hire</p>

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1 experts to work with us as a family that had
 2 backgrounds in trauma.
 3 And we had met with one woman, and then
 4 whatever. Again, I'm going to -- I don't know
 5 what the relevancy of it -- like I agree with you.
 6 I think there is definitely things there, but we
 7 have reunification in place and we have contracts,
 8 and so it might not be an issue ever or it might
 9 be something that Jill is going to help resolve.
 10 **Q You said the complex PTSD was something more**
 11 **recent. When did you first form the belief that**
 12 **she had complex PTSD?**
 13 A I got referred to by another doctor, the one that
 14 I've been working with was a therapist, and we
 15 found some documents and some studies, and then I
 16 read this really great -- several books, but I
 17 read this one book, Our Body Tells the Story, and
 18 that really kind of like -- when I read it I was
 19 like, holy shit, this is my wife, and then I
 20 studied and then I talked to somebody that had
 21 also suffered from PTSD, and they explained to me,
 22 you know, and so that's why I feel very confident
 23 that that's what I'm dealing with with my wife and
 24 all that that entails.
 25 Has she ever been diagnosed? No. Has she

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1 we'd get into a discussion or argument. Camryn
 2 would freak out and call mom, and mom would blast
 3 through the front door and grab Camryn and whisk
 4 him away by always rescuing him.
 5 Allie's best friend. God, we don't know
 6 why Allie always just jumps when Camryn wants
 7 something. And so when you have a parent that is
 8 constantly taking responsibility away from their
 9 children, she wouldn't even let the kids have
 10 chores.
 11 Please, Allie, give Julian the
 12 responsibility to take the garbage out. He's got
 13 too much on his hands. Let me take it.
 14 So that parenting style leaves lasting
 15 affects on children. They need responsibility.
 16 They need consequences. So when you have a parent
 17 that parents, you know, from this position in a
 18 very guarded manner, it has a lasting impact on
 19 them.
 20 And, you know, my older son is an
 21 alcoholic. My middle son has been arrested for
 22 pretty aggressive assaults on women, and my third
 23 son has tried to kill themselves, has been a
 24 cutter for years, and all under Allie's watch, so
 25 maybe -- I don't know. I can explain it a lot of

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1 ever attempted treatment? She did one time, one
 2 session EMDR, and she got that close, but it was
 3 too much, so she left. She did one session.
 4 MS. GOFF: Let me ask you what is the
 5 relevance of all this? What's the relevance?
 6 **Q Well, that's what we have asked him what the**
 7 **relevance is, and Charlie says --**
 8 A I said the relevance is it affects every aspect of
 9 our lives, our children's, our business, whatever.
 10 I wanted the PRE. I had pressure. I regret not
 11 getting the PRE in the beginning, but
 12 reunification is in place and the contracts are in
 13 place, and if it's an issue, she will find it.
 14 **Q Who will find it?**
 15 A Jill, the reunification therapist.
 16 **Q What impact specifically do you think Alyson's**
 17 **unresolved childhood trauma or complex PTSD has on**
 18 **Camryn?**
 19 A A lot of different -- a lot of different areas.
 20 Again, I can't -- it's a very complex question and
 21 I have documents or I have information I could
 22 read or whatever talking about it, but think about
 23 the permissive parenting, right?
 24 If you're always coming to your child's
 25 rescue, right, so Camryn would come visit me and

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1 different ways, but those are facts.
 2 **Q All these things that you just described, weren't**
 3 **the kids also under your watch?**
 4 A Absolutely. And did I contribute to some of it?
 5 I am willing to accept my responsibility for my
 6 children, and I am sitting before you and I sit
 7 before them and I have sat before many therapists
 8 and said I would love nothing more than to work
 9 with my children to resolve any issues that they
 10 have.
 11 **Q Have you told Alyson that you believe she suffers**
 12 **from these issues?**
 13 A Yep.
 14 **Q What was her response?**
 15 A It depends. Recently she said that she had read
 16 certain books I had given her and that she was
 17 dealing with her past, but I think it was the
 18 first time she even actually ever said that she
 19 read a book I gave her.
 20 You know, when I tried to explain to her
 21 about ADHD, you know, when she moved out that was
 22 the one book she left on the fucking bed. It was
 23 like a big F-U.
 24 **Q Have you told anyone else that you believe that**
 25 **Alyson suffers from complex --**

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1 A Yep.

2 Q **If you could just let me ask the question.**

3 **Have you told anyone else that you believe**

4 **Alyson suffers from complex PTSD and unresolved**

5 **childhood trauma?**

6 A Yes.

7 Q **Who?**

8 A Anybody that asks what's going on with your

9 divorce.

10 Q **Have you told professionals that you believe**

11 **Alyson suffers from complex PTSD and unresolved**

12 **childhood trauma?**

13 A Yes.

14 Q **Who?**

15 A Professionals? When you say professional like

16 lawyers, like therapists? What do you mean by

17 professionals?

18 Q **Lawyers, therapists, anyone that you work with and**

19 **pay.**

20 A Uh-huh. Anybody I work with and pay? Yeah,

21 actually, one of my employees. We were talking

22 and they told me that they suffered from it, and

23 they have been incredibly helpful with me in

24 understanding and translating things, so yeah.

25 So like I said, it's my belief. I always

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1 the past I've used it for like maybe gas in my car

2 if I go to Denver for business trips. I know it

3 pays our insurance, our personal insurance,

4 you know, health insurance.

5 Q **Besides your therapy, personal insurance, gas for**

6 **your car, anything else?**

7 A Not that I can think of. I'm sure there is other

8 things.

9 Q **Do you agree that the personal expenses because**

10 **your company is paying for it should be accounted**

11 **for in some way when we are talking about your**

12 **income and the valuation of the company?**

13 A Yeah.

14 Q **How do you think they should be accounted for?**

15 A The same way that -- yeah, I think those would be

16 my responsibilities in the future.

17 Does that answer your question?

18 Q **No. Do you agree with how Mr. Harkness accounted**

19 **for the personal expenses and added that back in**

20 **as far as the valuation of your company?**

21 A I think what he did -- you are asking me about my

22 personal expenses? I think what he did was take

23 our personal expenses and put them back into the

24 report, not just mine.

25 Q **Do you agree or disagree with that?**

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1 preface it by saying, you know, it is my opinion

2 and that I share with a trauma specialist that

3 treats and deals with PTSD. It was something that

4 I was told by the person conducting the EMDR that

5 was also a specialist that she felt that Allie was

6 definitely suffering from unresolved trauma.

7 Q **Who is the trauma specialist you're referring to?**

8 A Nicol.

9 Q **Nicol who?**

10 A I forget her last name. Sorry. Allie has all of

11 that, and I'm sure you have it too.

12 MS. GOFF: I need five minutes to go to

13 the bathroom if we're going to keep this up.

14 (Break taken.)

15 BY MS. MILFELD:

16 Q **Do you acknowledge that Tool Studios pays for some**

17 **of your personal expenses?**

18 A Yes.

19 Q **What are those personal expenses?**

20 A It pays for my therapy, but we booked it as

21 consulting only because I do talk about a lot of

22 business challenges and all that kind of stuff, so

23 that's the big one.

24 I think it pays -- oh, man, that's the big

25 one. I'm trying to think what else. I think in

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1 A I agree if it was just mine it would make sense,

2 but not both of ours.

3 Q **Why do you disagree that Alyson's**

4 **personal expenses should not be added back in?**

5 A I guess I'm confused by this question. I'm a

6 little confused by it. Sorry.

7 Q **If you look at Exhibit 1, the Tool Studios**

8 **valuation, look at schedule 4.**

9 A Where do you see schedules?

10 Q **Are you on schedule 4?**

11 A Yes.

12 Q **Do you see how, for example, Mr. Harkness added**

13 **back personal expenses, and in 2018 that number**

14 **was \$28,916? Just do you see that?**

15 A Add back personal expenses? I see it.

16 Q **Do you agree that this is an appropriate**

17 **adjustment?**

18 A I would have to know what those numbers

19 represented. I'm sorry.

20 Q **But do you agree with the concept that**

21 **Mr. Harkness is adding back in personal expenses**

22 **because the company paid for it?**

23 A Add back personal expenses? Add back. What are

24 we adding back is where I get confused.

25 Q **So look at schedule 4, please.**

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1 A Uh-huh.

2 Q Do you see how that's a positive number?

3 A Uh-huh.

4 Q So the net book income, for example, for 2018 is

5 \$72,923, and then if you go down there is \$28,000

6 that's included, so that number is in addition to.

7 Do you understand that?

8 A What does net book income mean? What does net

9 book income mean?

10 Q We talked about, for example, add back of

11 charitable contributions. You understand the

12 concept that that amount is added to your business

13 revenues? "Add back" means in addition to.

14 A Calculations of adjusted net income. Net income.

15 I don't think at this time I'm qualified to even

16 comprehend this thing, so I'm sorry. It's just

17 not my brain. I'm not trying to be difficult at

18 all.

19 Q So you would agree with me that you've been very

20 critical of how the personal spending is not being

21 appropriately categorized?

22 A Yeah, I agree with that, yeah.

23 Q How is it that we are here when the divorce was

24 filed in 2022 and you still don't know what the

25 categories are of the personal expenses?

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1 Q But you reached out to them without asking Allie,

2 right?

3 A No. I told her I was going to look, but of course

4 I reached out because of this problem. I needed

5 it resolved.

6 Q Did you know that Alyson did an exhaustive

7 examination with Jeremy from the general ledger?

8 Do you know this?

9 A I have not seen any of that, so I don't --

10 Q Do you know this is how Jeremy got all of these

11 numbers on schedule 4 is because Alyson met with

12 Jeremy and provided him with a comprehensive

13 highlighted general ledger? Do you understand

14 that?

15 A Again, I don't know what to tell you. I have

16 already told you that I'm not trying to --

17 MS. GOFF: Can we go off the record?

18 Can we go off the record?

19 (Discussion off the record.)

20 A So I have no issue with Jeremy's process, right?

21 I don't. I really don't have any issue with it.

22 I don't have an issue with necessarily the last

23 188 evaluation.

24 My point and what I have been trying to

25 state is that the value of the company fluctuates

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1 A Why don't I know?

2 Q How is it that you still haven't figured out the

3 categories of personal expenses when the divorce

4 was filed last year?

5 A I answered that question. I have asked -- I've

6 found -- asked Allie to work with a person that

7 was qualified to do that. She even gave a list of

8 things that we asked which included itemizing and

9 classifying the personal expenses.

10 Q Well, you had two people that you said earlier --

11 I asked Allie to do it. She has refused.

12 Q Let me ask this question. You have asked two

13 people to look at your books?

14 A I have asked Allie to allow two people.

15 Q There are two people who have looked at your

16 books --

17 A Yep.

18 Q -- that you talked about earlier, both of whom you

19 said were great. How is it when they looked at

20 your books that you just didn't ask them to

21 categorize these expenses that you're having an

22 issue with?

23 A Again, what they found was that we need to do

24 this. I then asked Allie to do it because Allie

25 refused to let me hire them. That's why.

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1 and has been on a downturn, and that original

2 evaluation did not take into account a retainer or

3 a few retainers that were in it, so we got that

4 straightened out.

5 So again, my only issue is the valuation of

6 the company that it includes all the legal fees

7 and all the fees that the company has been paying

8 for, so if we agreed that, okay, we are going to

9 remove that, you know, from 188, let's go and see

10 how much money the company has paid since the 188

11 and we make the adjustments, then great. Then I'm

12 good.

13 Q But why would we make an adjustment for an expense

14 that's not going to happen after you're divorced?

15 A We're not. We're making it before the divorce.

16 Yeah, it was adjusted, but now there's even more

17 money that's been spent. That's the part, and

18 that's why Jeremy offered up -- he said, yeah, I

19 see another \$50,000 the company spent, and that

20 number put into the bank account represents it, so

21 that's all I'm getting at.

22 So like I said, we don't need to discuss

23 this. I think it's fine. My point about the --

24 my point about being able to see what was my

25 expenses and what was Allie's, what was family

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<p style="text-align: right;">Page 117</p> <p>1 expenses that is not in the general ledger.</p> <p>2 Q How do you know that it's not in the general</p> <p>3 ledger if you haven't seen it?</p> <p>4 A Because in mediation we found the one creditcard</p> <p>5 that was paid by the company in Allie's name that</p> <p>6 had expenses on it that were classified in a way</p> <p>7 that didn't make any sense, the massages, the</p> <p>8 Niwot Liquor. Those expenses were not classified,</p> <p>9 so that's why. And that is why mediation ended,</p> <p>10 in my opinion, and what Peggy told me, so that's</p> <p>11 all I can tell you. So I'm fine, like I said.</p> <p>12 Q But you're not fine. I mean, when you say you're</p> <p>13 fine, you're fine with what?</p> <p>14 A I said I'm fine with an evaluation that Jeremy</p> <p>15 does and his formulas as long as it takes into</p> <p>16 account the money that is being spent currently</p> <p>17 and up to the point when we freeze and we are</p> <p>18 going to say divorce is over, no more money.</p> <p>19 The company is not going to pay anymore</p> <p>20 lawyer fees, the company is not going to pay</p> <p>21 anything like that. That's the value of the</p> <p>22 company at that moment. That is when we put it</p> <p>23 out and that's when we are done, and that is fair</p> <p>24 to me. Otherwise you are saying Allie can spend</p> <p>25 whatever the fuck she wants to spend from then</p>	<p style="text-align: right;">Page 118</p> <p>1 until now out of the company, and that doesn't</p> <p>2 seem right to me. Sorry.</p> <p>3 Q Do you agree that the February 28th, 2023 and</p> <p>4 April 30th, 2023 valuations are the investment</p> <p>5 value of the business and not a liquidation</p> <p>6 valuation?</p> <p>7 A I think they're one and the same.</p> <p>8 Q Do you understand that the values that</p> <p>9 Mr. Harkness came up with are the fair market</p> <p>10 value of the business and the investment value,</p> <p>11 correct?</p> <p>12 A The 188, whatever that number is, however it was</p> <p>13 calculated, I think it's really close, yeah.</p> <p>14 Q You understand that that's the fair market value,</p> <p>15 correct?</p> <p>16 A Fair market value? I don't know what the</p> <p>17 definition of fair market value is. That seems</p> <p>18 like what somebody is willing to pay for it.</p> <p>19 Q You do not intend to sell the business, right?</p> <p>20 A It's unsellable. I've been told that.</p> <p>21 Q And that wasn't my question. You do not intend to</p> <p>22 sell the business?</p> <p>23 A No.</p> <p>24 Q Without providing me with a legal analysis, do you</p> <p>25 think that you have a support obligation to</p>
<p style="text-align: right;">Page 119</p> <p>1 Alyson?</p> <p>2 A What is support? What does that mean? Define a</p> <p>3 support obligation.</p> <p>4 Q Do you think that you have a maintenance</p> <p>5 obligation to Alyson?</p> <p>6 A Under certain conditions, yes.</p> <p>7 Q What are those conditions?</p> <p>8 A That she made a valid effort to gain viable income</p> <p>9 and a job.</p> <p>10 Q What to you is an effort? What does an effort</p> <p>11 look like to you?</p> <p>12 A Have Peggy Shell help her, get her LinkedIn</p> <p>13 account up, get her resume written, get</p> <p>14 references. She has a million of them, and get</p> <p>15 all that ready and start applying for jobs.</p> <p>16 Q What about the job that she has now?</p> <p>17 A \$20 an hour, \$1,200 a month? I don't know. She</p> <p>18 only works -- she only brings in \$1,500 a month,</p> <p>19 so how is that a job? Like I told you, she took</p> <p>20 the job before she even knew what it paid, the</p> <p>21 \$1,200 a month one, and the other stuff just</p> <p>22 averages 2 or 3 hours a week.</p> <p>23 Q Do you think she is capable of earning more than</p> <p>24 \$24 an hour?</p> <p>25 A Oh, absolutely.</p>	<p style="text-align: right;">Page 120</p> <p>1 Q What is that based on?</p> <p>2 A Again, I am more than qualified to understand her</p> <p>3 skill set, I am more than qualified to understand</p> <p>4 the jobs that are in the market, and I am more</p> <p>5 than qualified to even help her get a job that</p> <p>6 pays 60 or above, so that's why I know. I worked</p> <p>7 with her twenty years. I know her skills.</p> <p>8 Q What skills does she have?</p> <p>9 MS. GOFF: Asked and answered.</p> <p>10 A Organizational skills, detail skills, project</p> <p>11 management skills, event coordination skills,</p> <p>12 design skills, production skills when it comes to</p> <p>13 file preparation, print-buying skills. General</p> <p>14 ledger booking skills, I guess. Probably she's</p> <p>15 probably gotten good after all this. Personal</p> <p>16 assistant skills. Appointment scheduling.</p> <p>17 I'm getting ready to hire a virtual</p> <p>18 assistant that makes \$35 an hour that I wish had</p> <p>19 half of Allie's skills, but she's got some good</p> <p>20 skills, but she is not regimented like Allie, you</p> <p>21 know, like everything is on the calendar,</p> <p>22 everything.</p> <p>23 That skill set alone is probably one of the</p> <p>24 most valuable right now in the country, personal</p> <p>25 assistants, virtual assistants, you know, account</p>

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1 managers, that kind of stuff, especially in the
 2 virtual world.
 3 **Q Do you know that \$60,000 equates to \$28 an hour?**
 4 A I said 60 or more, so yeah.
 5 **Q Do you know whether the \$60,000 jobs that you're**
 6 **thinking of would have the flexibility that you**
 7 **discussed earlier that would be beneficial for**
 8 **Camryn?**
 9 A I do. I think that -- I have always believed
 10 especially knowing that we have a group in Florida
 11 that's a husband and wife that work out of their
 12 home.
 13 They have a nine-year-old kid, and they do
 14 incredible stuff for me that Allie -- I offered to
 15 Allie as work, so if they're able to do it for me
 16 and I know Allie could do their job, so I believe
 17 in Upwork. Look, I believe in Upwork, and I hire
 18 people all the time to do that kind of stuff.
 19 **Q Do you have actual knowledge of jobs available to**
 20 **Alyson right now in Colorado?**
 21 A I pulled up some a week ago. There was several, I
 22 thought, that were really -- there was calendar
 23 executives. There was personal assistants.
 24 Indeed. What's the other big one? They're
 25 creative. There's a bunch of different ones.

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1 **Q You said another thing that has come out of it is**
 2 **your mental health. What did you mean by that?**
 3 A Well, just meaning that, you know, look, being
 4 ADHD as an adult and how it all came about,
 5 you know, this has been, you know, living with
 6 somebody like Allie and her living with somebody
 7 with ADHD is complex and it's complicated and it's
 8 painful and there's so much shit that happens
 9 underneath it all.
 10 And like I said, I knew that I couldn't
 11 make the allegations and the accusations that I
 12 make toward Allie in regards to the things that I
 13 do without taking care of myself, and that's why I
 14 have a \$300 a week therapy bill.
 15 And I am committed to my children, I'm
 16 committed to Allie, I'm committed to my family
 17 that I'm going to be the best possible person I
 18 can be, and I will try to provide as best as I can
 19 and my share.
 20 **Q Who is the therapist you currently see?**
 21 A I see two.
 22 **Q What are their names?**
 23 A Leah Fox and Alisha Bowan.
 24 **Q How often do you see Ms. Fox?**
 25 A Once a week.

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1 Anyway, again, like I said, on Upwork
 2 too -- look, she has agreed to give me 50 percent
 3 custody of my child. I am trying my damndest to
 4 do everything I possibly am told to do with
 5 reunification to get us to that point.
 6 And I mean no disrespect to Alyson in her
 7 abilities. If anything, I have praised them, and
 8 we are both entitled to raise our children and to
 9 be a part of their lives.
 10 And yes, I wasn't there as much as I should
 11 have been, and that's been -- if anything
 12 beautiful that's come out of this has been my
 13 mental health and, you know, my commitment to my
 14 children, and I am making progress at least with
 15 them, and I'll get there.
 16 **Q What progress have you made?**
 17 A You know, they are spending time with me. My
 18 middle son that wouldn't talk to me for several
 19 months now lives with me and we are doing great.
 20 Camryn, the middle one that refused to see
 21 me, we had breakfast the other day. We had a
 22 great chat even last night after that whole e-mail
 23 thing. You know, we had great correspondence, we
 24 had great discussion, and they came over and got
 25 their computer, so I'm making progress.

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1 **Q How often do you see Alisha?**
 2 A Once a week. I don't know the spelling.
 3 B-O-W-A-N.
 4 **Q What kind of professional is Leah Fox? Is she a**
 5 **therapist?**
 6 A Uh-huh. She's a therapist that specializes in
 7 trauma and EMDR. She's certified in EMDR as well.
 8 **Q Do you have a trauma diagnosis?**
 9 A No. I started seeing her in order to better
 10 translate some of the things that were going on
 11 with my wife, with Allie, and she is the one that
 12 has kind of co-authored this stuff with me in
 13 regards to ramifications of parenting with
 14 somebody with that kind of thing.
 15 **Q Are you looking at an e-mail right now from**
 16 **Alisha Bowan?**
 17 A No, I'm not. No, I'm not. Sorry. I show know
 18 this stuff, but I'm a little flustered. Here we
 19 go. B-R-O-S-S-E. Alisha Brosse, Ph.D. She owns
 20 the CBT Cognitive Behavior Trauma Center in
 21 Boulder. She has several people working
 22 underneath her.
 23 **Q What kind of professional is Ms. Brosse?**
 24 A Alisha? Like I said, she's a specialist. The
 25 Boulder Center for Cognitive Behavior Therapy.

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1 Q Is she a therapist, psychologist or something
 2 else?
 3 A I don't know exactly what she is. Right here, our
 4 experts. "I am a licensed psychologist who
 5 specializes in cognitive behavioral therapies for
 6 a wide range of presenting problems, especially
 7 mood disorder, depression, bipolar disorder,
 8 anxiety disorder." And then her bio goes on to
 9 read a bunch of different things.
 10 Q How long have you seen Ms. Fox for?
 11 A Six months for Ms. Fox, and I think over a year,
 12 maybe a year and a half with Alisha, and then I
 13 have another meds doctor named Jordan Atkins.
 14 Q When you say a meds doctor do you --
 15 A A nurse practitioner.
 16 Q If you could just let me finish the question
 17 before you answer.
 18 A Uh-huh.
 19 Q How long have you been seeing the nurse
 20 practitioner for?
 21 A Close to two years since my regular therapist
 22 retired. Then I broke it into two, so Alisha and
 23 then Jordan.
 24 Q How much do you pay Ms. Fox per week?
 25 A 150.

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1 what do you mean then you've been diagnosed with
 2 ADHD?
 3 A Okay. So I guess this is -- I had the same
 4 question. So Alisha, Leah and Jordan all talked
 5 and they all agreed, and my old therapist of
 6 ten years they even got involved, and because I
 7 was being accused of being bipolar by Alyson, and
 8 I never really agreed with that.
 9 So I really started to push really hard to
 10 figure out what it is that was causing some of the
 11 emotional deregulation that I experienced, and
 12 then Jordan, the meds person when I first started,
 13 he's the first one that challenged it and said I
 14 don't think you're bipolar at all. I think you're
 15 probably ADHD.
 16 And they talked together. I said, well,
 17 can I get a formal evaluation? And they said,
 18 Charlie, look, we really don't think it's
 19 necessary.
 20 We think that all these things state -- we
 21 think that the medication that we've started with
 22 you is having a positive impact on you. And I
 23 felt like that was enough, and it was very
 24 expensive to get a formal evaluation, so I went
 25 with the professionals.

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1 Q How much do you pay Alisha?
 2 A \$165. I pay her cash.
 3 Q How often do you see Jordan?
 4 A Him I see once a month.
 5 Q How much do you pay Jordan?
 6 A 150 a visit.
 7 Q What source do you use to pay these professionals?
 8 A I think we book it all through the company as,
 9 like I said, the consulting part.
 10 Q You are saying that your company Tool Studios pays
 11 for Leah, Alisha and Jordan?
 12 A Yep. Consulting, we call it. We book it as
 13 consulting.
 14 Q Tool Studios is --
 15 A We book it as consulting fees.
 16 Q When were you first diagnosed with ADHD?
 17 A Six months, seven months ago. No, longer than
 18 that, about a year.
 19 MS. GOFF: I think asked and answered
 20 already.
 21 Q I don't think he did.
 22 A A year. A year ago.
 23 Q Who diagnosed you?
 24 A Jordan. I don't have a formal diagnosis.
 25 Q When you say you don't have a formal diagnosis,

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1 Q Did you tell Mr. Harkness that the therapy
 2 appointments were being booked as consulting
 3 expenses?
 4 A Probably. I'm pretty transparent about that.
 5 Q Do you agree with I guess we can call it your
 6 informal diagnosis of ADHD?
 7 A Uh-huh.
 8 Q Is that a yes?
 9 A Yeah, an informal, yeah, diagnosis of ADHD, yeah.
 10 Q What treatment have you received for your ADHD?
 11 A You mean treatment? Yeah, I mean, that's what I
 12 go to therapy for to work on that. I have also
 13 hired -- I had an executive coach that helped me
 14 with a lot of the cognitive-type neurological
 15 challenges that comes with being ADHD.
 16 I take medication. I take Adderall and
 17 then I also take Lamotrigine, and then another one
 18 called -- oh, shit. Don't ask me. Gabapentin? I
 19 have pictures of all this stuff.
 20 And it's been something we've been working
 21 on diligently to make sure that I'm living my best
 22 life. And, you know, what they would say and what
 23 I say is the diagnosis that I have post-divorce
 24 was life-changing and the treatment was
 25 life-changing for me, and I have owned and

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<p align="right"><i>Page 129</i></p> <p>1 apologized to Allie and my kids for any effect it 2 had on them, and I own that a hundred percent. 3 Q How does your ADHD now affect your daily 4 functioning? 5 A I think it's a challenge to keep things really 6 structured, right? So, you know, a great example 7 is like I never got that document, but then it was 8 in my folder that I labeled specifically. 9 You know, remembering appointments. 10 You know, a lot of that kind of stuff and, look, 11 there's incredible books out there that really 12 talk about the challenges of ADHD, but I don't 13 think there's a psychiatrist or a person on the 14 planet that wouldn't say I was not doing 15 everything possible to make sure that my mental 16 health was not interfering with anything. 17 There is challenges with it. You have to 18 be really careful with medications because the 19 creative brain, what I do for a living, you have 20 to balance with medication so that you don't numb 21 yourself to it all and you allow the freedom, but 22 right now, like I said, I have never felt better 23 physically or mentally, and I'm going on like 24 150 days of three miles a day. I'm running now. 25 Q On a scale of 1 to 10 with 10 being the best</p>	<p align="right"><i>Page 130</i></p> <p>1 functioning, how would you rate yourself today? 2 A Ten. You know, in comparison with somebody not 3 ADHD? I don't know. 4 Q Before your informal diagnosis of ADHD have you 5 been diagnosed with any other mental health issue? 6 A Yeah. Like I said, I had somebody that told me 7 that they thought I was bipolar, and I thought 8 that for years, but then there was certain things 9 that didn't fall into alignment when it comes to 10 the DSM-5, you know, the Bible for mental illness, 11 and it just didn't register with me, so anyway. 12 Q Who diagnosed you with bipolar disorder? 13 A Greg Olson. 14 Q Who is Greg Olson? 15 A He was my therapist for 10 years. 16 Q Did you take medication? 17 A Uh-huh. 18 Q What medication did you take? 19 A Lamotrigine. Lamotrigine. 20 Q How long did you take that medication? 21 A I still take it. 22 Q So you take Lamotrigine in addition to the 23 Adderall and Gabapentin? 24 A Yeah. 25 Q Are you taking any other medications?</p>
<p align="right"><i>Page 131</i></p> <p>1 A Fish oil. I've been wanting to put together a 2 list of my medications, and I'm trying to think 3 where I have them. Sorry. Yeah, this is it. 4 It's called Guanfacine, G-U-A-N-F-A-C-I-N-E, and 5 that was really the silver bullet for me. 6 Q The silver bullet was the Guanfacine? 7 A Uh-huh. 8 Q How long have you been taking Guanfacine for? 9 A Four months. 10 Q What is the dosage of your medications? 11 A It varies. 100 milligrams which is a low dosage 12 of Lamotrigine. 30 milligrams on the Adderall XR 13 which is a low dosage, and then the Guanfacine is 14 4 milligrams. And then I take Flomax for 15 urination, and I don't even know what that one is. 16 Q How often do you take these medications? 17 A Daily. 18 Q What do you like/not like about the medications? 19 A You know, there's not a lot I don't like about 20 them, to be honest with you. You know, I wish 21 there was a magic pill that would make me 22 organized, but I definitely am a lot more focused. 23 The emotional deregulation that I'm guilty of in 24 the past has definitely been stable. 25 Time has always been a challenge with ADHD.</p>	<p align="right"><i>Page 132</i></p> <p>1 It's like the brain neurologically has challenges 2 with time. So if you say, you know, be there at 3 3, you know, somebody with ADHD doesn't grasp that 4 I better leave 15 beforehand and all that kind of 5 stuff. So those are things that still exist on 6 some level, but the emotional deregulation is 7 still -- I feel great about. 8 Q Do you think seeing Alisha, Jordan and Leah have 9 been helpful? 10 A Absolutely. 11 Q How so? 12 A It's life-changing. I think they give you skills, 13 you know. I'm a big strong believer in mental 14 health. You know, my family, my sister heads-up 15 with Kenneth Cole one of the largest mental health 16 organizations. My older sister is bipolar 1 and 17 one of the top wealth managers in the world. I 18 don't know. What was the question? Sorry. 19 Q Whether you think seeing Leah, Alisha and Jordan 20 have been helpful. 21 A Oh, yeah, yeah, they have been helpful. And you 22 said why or how they have been helpful. I don't 23 know. I think they just give you new tools and 24 tricks and give you a place to vent and give you a 25 place to be in check.</p>

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<p style="text-align: right;">Page 133</p> <p>1 Leah, for Leah the big challenge with Leah 2 was I needed her to prove me wrong as much as I 3 wanted her to confirm what I thought, so her job 4 has always been, hey, this happened. Do you think 5 it's this? 6 And she would always come back and say, 7 well, maybe not or maybe so. Do you know what I 8 mean? So she was always trying to translate 9 certain things like text messages from Camryn, 10 e-mails from my son, e-mails from Allie, 11 phonecalls from Allie. 12 So she has been a very critical part in 13 understanding, you know, the complexities of and 14 the affects of complex PTSD on a family and on 15 myself, so she has been helping me through this 16 and she really is the one that I think kept me out 17 of the loony bin too meaning that there was so 18 many things going on with Allie that I just 19 couldn't comprehend. 20 You know, when you see your wife revert to 21 a child in a therapy session, it fucks you up. 22 I'm sorry, my language, but I wouldn't wish that 23 on anybody. 24 And so they have helped me learn a lot 25 about Allie and not to take so much of it</p>	<p style="text-align: right;">Page 134</p> <p>1 personally, and to understand why she will lie and 2 just re-evaluate a situation that -- you know, the 3 best example I have is your e-mail yesterday that 4 she said something about a text, but everybody 5 that looked at it did not see your response in the 6 e-mail. It was like there was nothing wrong with 7 what I sent. 8 So I don't mean that in a bad way. I'm 9 just saying I don't know what happened. But I 10 know the response I got about, you know, the words 11 that were used in the e-mail and making 12 accusations that I had -- I forget the word. It 13 was like constant e-mails, a barrage, and I was 14 like there was three text messages, so I don't 15 know what -- and I know that I have seen her 16 cherry-pick. 17 Q When you said prove me wrong, prove you wrong 18 about what? 19 A Just about complex PTSD, the things that I was 20 seeing were actually true. 21 Q About the complex PTSD about who? 22 A Allie. About Allie, yeah. 23 Q So you wanted your therapist to prove you right 24 about what you were seeing with Allie? 25 A No. Look, if you know anything about PTSD, and I</p>
<p style="text-align: right;">Page 135</p> <p>1 have become very knowledgeable about it, do you 2 know what I mean? You have to -- it's so complex. 3 There are things that happen that you can't 4 explain to a normal thing that don't make any 5 logical sense out of Allie. 6 And when somebody comes to you like I 7 talked to you about these flashbacks and all that 8 kind of stuff, there is behavior that's involved 9 with your children, with everything, that I wanted 10 to make sure I wasn't nuts? Do you know what I 11 mean? 12 Because I have a wife that is accusing me 13 of, oh, it's me, me, me. You're bipolar. You're 14 crazy. And I'm like I'm not crazy. No, you do 15 this. I've never done that. No, you said this. 16 I never said that. 17 So you deal with this thing. I'm too smart 18 and too open to be able to know what I know and 19 find the rest to help me learn the rest, so that's 20 what I mean, like I said. 21 Q How is Allie's PTSD and you talking to your 22 therapist about it a business expense? 23 A I think that one is definitely challengeable, but 24 I can tell you that something that really is 25 positive has come out of it too is to make sure</p>	<p style="text-align: right;">Page 136</p> <p>1 that I look at my own childhood, you know, because 2 I didn't have a great childhood, but nothing 3 compared to Allie. 4 So there was a lot of that that went into 5 it, and then she also kind of -- we talk about 6 some of the business stuff, and not a lot, but I 7 think that one would be -- that one I would 8 definitely agree possibly doesn't belong in the 9 business. 10 Q Do you think the work that you're doing with 11 Jordan and Alisha also fall in that category? 12 A No, I would not, and I'll tell you why because, 13 look, the business needs me to function as best as 14 I can in order to perform adequately, and if those 15 two help me do that, then I think it's a 16 legitimate business expense and one that I 17 definitely cleared with my accountant too as well. 18 Q Do you get validation from your therapist about 19 Allie? 20 A Validation? Oh, you mean do they concur? 21 Q Yes. 22 A Yes. Are they aware of it? Yes. 23 Q Are you saying that Leah agrees with you about 24 your belief that Allie suffers from complex PTSD? 25 A Yes.</p>

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1 Q **Has Leah ever spoken to Allie?**
 2 A No, but Leah has spoken to people that have spoken
 3 to Allie and has spoken with my therapist that has
 4 spoken with Allie's therapist and also with Nicol
 5 who was doing EFT that had also met Allie, so
 6 there is part of that. Is there a lot of it? No.
 7 Q **So you're saying that Leah spoke to Allie's**
 8 **current and previous therapist?**
 9 A No. Leah, Alisha and Jordan have spoken. Alisha,
 10 my main therapist, has spoken with Allie's
 11 therapist on more than one occasion and has also
 12 spoken with Nicol who was our therapist that
 13 conducted EFT that had a background also of trauma
 14 and EMDR treatments.
 15 Q **Did Allie sign a release with her current**
 16 **therapist?**
 17 A Yep.
 18 Q **Did Allie sign a release with the couples**
 19 **therapist?**
 20 A Yes.
 21 Q **Was the release so that your therapist could speak**
 22 **to them?**
 23 A Yeah. Oh, wait, no. Yeah, she signed a release
 24 that let everybody talk to everybody.
 25 Q **When was the release signed?**

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1 would like to believe that we probably both were
 2 working full-time and we would take turns. It was
 3 more of a collaborative thing for the first
 4 five years probably.
 5 You know, we both were working full, part,
 6 full, part, but then after Camryn was born, yeah,
 7 when Julian came, the first one, that was 19 years
 8 ago, she worked less. So I think it's always been
 9 full-time/part-time kind of a situation with us.
 10 Q **What were Alyson's caretaking responsibilities?**
 11 A God, I'll be the first to say she took care of
 12 pretty much everything. Logistics, she took care
 13 of all the appointments. She took care of all the
 14 school stuff, and I would just make money. That
 15 was my job, yeah.
 16 Q **Did the caretaking responsibilities as you just**
 17 **described it change?**
 18 A No. She's always been, like I said, the primary
 19 caregiver for my children, yep.
 20 Q **What is Camryn's gender identity?**
 21 A Male.
 22 Q **How long has Camryn identified as being male?**
 23 A Pretty recent. I think he just had his year
 24 anniversary.
 25 Q **When did you first find out that Camryn identified**

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1 A Right before the divorce, you know, while we were
 2 in this EFT therapy because they wanted everybody
 3 talking. It was all part of that.
 4 Q **When was Camryn born?**
 5 A 2009, October 8th.
 6 Q **After Camryn was born what were your caretaking**
 7 **responsibilities?**
 8 A You know, just probably more traditional father
 9 stuff. You know what I mean? But we had a good
 10 relationship. I loved doing bath-time. And when
 11 they were really young they were very difficult
 12 because they were colicky, I guess they call it,
 13 where they cry all the time, so I remember many
 14 nights laying on the floor with my finger through
 15 the crib, and I would go to every event, you know,
 16 whenever I could. I love that kid.
 17 Q **Did you work full-time after Camryn was born?**
 18 A Absolutely.
 19 Q **Did Alyson work full-time after Camryn was born?**
 20 A Allie I don't think really ever has worked
 21 full-time necessarily for the company. Earlier
 22 before my older son came to live with us who was
 23 11, and this was before we were married, she had a
 24 full-time job.
 25 And then when we started the company I

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1 **as being a male?**
 2 A Three months after or two months after mom.
 3 Q **I'm sorry?**
 4 A It was three months, I think, after he told mom,
 5 but I think it was only one month after they told
 6 mom.
 7 Q **When was that?**
 8 A A year ago, like I said.
 9 Q **What was your reaction to finding out that Camryn**
 10 **identified as a man or a boy?**
 11 A You know, I get asked this question. I definitely
 12 had -- like I said, I had no issues, but then a
 13 billion things go through your mind.
 14 You know, a father/daughter, I mean, I
 15 don't know how you are with your fathers, but it's
 16 a separate -- it's a bond that, you know, I think
 17 there was grieving. I think there was some
 18 confusion. There was some whatever, but I never
 19 stopped loving him and being supportive of it, and
 20 to this day I am still.
 21 At the beginning I wasn't that great about
 22 the he/him because it started out as "they" and
 23 then it shifted to him, and I slipped up all the
 24 time.
 25 I mean, I'm so much better and, you know,

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1 we talk about it all the time. But I wear my
 2 rainbow colors proudly and I tote my flag outside
 3 my window, and I look forward to being there every
 4 step of the way and fighting for that kid, you
 5 know, because it's not easy. That breaks my
 6 fucking heart, and I love him very much.

7 **Q What are your preferences in the order of what you**
 8 **would like to see happen to the house, either you**
 9 **keep it or Allie keeps it or sell it?**

10 A I know I drive a lot of people nuts by not having
 11 clarity on that question, and when we originally
 12 divorced or originally when she ran and she got a
 13 formal offer from me it was like as long as you're
 14 in treatment then you can stay in the house and
 15 you don't have to get a job.

16 You know, I'll do everything to do it, and
 17 that was my offer. And part of me still believes
 18 that. I wish that was the case, but I'm letting
 19 go of that. I'm letting go of that, and I don't
 20 have the answer yet for that, and I know I have to
 21 make one sooner than later.

22 **Q Do you think it's important for Camryn that Camryn**
 23 **and Allie be in the house?**

24 A No, I don't.

25 **Q Why not?**

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1 Camryn feels. Camryn mirrors Allie almost to a T.

2 **Q Well, let's get back to the original question**
 3 **which is --**

4 A I said I think it matters, but I think it's being
 5 influenced.

6 **Q Can you rank in order your preference as far as**
 7 **you keeping the house, Allie keeping the house or**
 8 **the house being sold?**

9 A I think me keeping the house, sold, Allie.

10 **Q And you're saying the order is you keeping the**
 11 **house first. Has Allie told you that she wishes**
 12 **to stay at the marital home?**

13 A Yes.

14 **Q When was the last time Allie told you that?**

15 A She asked me to move out and let them move out
 16 until this was resolved last week, I think,
 17 two weeks ago or last week.

18 **Q What was your response?**

19 A I said I didn't feel comfortable doing that at
 20 this time.

21 **Q Why?**

22 A Well, one, I didn't have anywhere to go at the
 23 time. I still don't. I did make the offer to
 24 trade with her at one point, and if we have to
 25 sell it, then I want to be in the house because

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1 A I think it's a big house. I think it's a lot of
 2 care that goes into it. It has a big lawn, and
 3 this is stuff that I have always traditionally
 4 took care of.

5 I think Allie and Camryn having a nice
 6 smaller home, townhome, I just found one.
 7 Pat Murphy, the realtor. It's this perfect little
 8 house for them that wouldn't require maintenance
 9 and that kind of stuff.

10 Now, with that being said, yeah, like I
 11 said, I wish I had a better answer for you. I
 12 offered nesting, but Allie said no way which I
 13 thought was the most viable at least as far as the
 14 next four years go, but I also understand that's
 15 probably not the healthiest thing.

16 **Q Has Camryn expressed to you a desire to stay at**
 17 **the marital home?**

18 A Of course.

19 **Q Do you think Camryn's say matters?**

20 A You know, look, I absolutely think that that
 21 matters, but remember the reunification, we are
 22 trying to identify any issues or any contributions
 23 that Allie's permissive parenting is contributing
 24 to Camryn's behavior, how decisions are made with
 25 Camryn and many of the issues, you know, that

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1 I'm the one that can take care of anything that
 2 the realtor might want us to do and maintain the
 3 house, and I have done an incredible job up to
 4 this point in making sure that -- and I want to if
 5 we sell it -- I definitely have a game-plan for it
 6 that will yield us the most money.

7 **Q What is the game plan?**

8 A I want to list it by myself, and I've already
 9 talked to -- you know, I have a lot of realtor
 10 clients in my past, and so if I try to list it and
 11 let's just say give me 30 days, then I pay a
 12 commission that would save us over \$15,000 if we
 13 get the million-dollar asking price.

14 So it's a process. Tara, one of the
 15 realtors that we've agreed to use, the
 16 mother/daughter team, she has been totally helpful
 17 with me.

18 I have been totally transparent with her,
 19 and so if I list it on my own then a realtor comes
 20 to me with a buyer, then I pay them 3 and a half
 21 percent and they will handle all the paperwork,
 22 and I have confirmed that I can do this legally
 23 and I even have somebody that actually even
 24 offered to do it for 3 and a half percent.

25 **Q Who is that person that's offered to do it for 3**

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1 and a half percent?

2 A Well, I want to step back. The one that explained

3 to me about the 3 and a half percent explained the

4 process to do it and that they felt they had

5 buyers that they could bring right away, and

6 they're the ones that said usually we only pay

7 2.8 percent, but he is the one that explained to

8 me that if you give us an extra half point then we

9 will handle all the paperwork.

10 And again, I've got to work out the

11 details, but I'm trying. That's my top decision

12 right now to make, getting the financials ready

13 for you guys and then also the house.

14 And here, I'm going to tell you that with

15 Allie if Allie came to me and said I will buy you

16 out and we had the numbers correctly, I would

17 totally allow it, and if she wanted to I think --

18 and again, don't hold me to this -- anyway, I'm

19 not even going to say it.

20 Q Do you have the ability to buy Alyson out of her

21 share of the marital home?

22 A It would be really tight. It would be really

23 tight.

24 Q Do you have the ability to buy her out of the

25 marital home and the business?

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1 Do you see the equalization payment at the

2 bottom of about 91,000?

3 A Uh-huh.

4 Q Putting aside for a moment that these numbers

5 might change --

6 A Yeah.

7 Q Would you want the 91,000 paid in full?

8 A If that offer was there, you know, you're asking

9 me if I'd carry a letter of refinance that would

10 pay me back over four years or something like

11 that?

12 Q No. The question is the equalization payment is

13 91,000. Would you want that money paid in full?

14 MS. GOFF: Charlie, answer the question.

15 A Okay. I'm sorry. Maybe. Yes. No.

16 Q Why don't you know whether or not you'd want it

17 paid in full?

18 A Because I don't think it's a black and white

19 question. I think the bottom line is that, look,

20 if Allie wanted to make a play for the house,

21 right, and she came to me and said, hey, there's

22 \$100,000. Can I pay it over X amount of time?

23 Then I would consider it, but until the offer is

24 there, I don't know. And then there's real

25 numbers. I don't have the answer.

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1 A I would assume it's one and the same, yeah.

2 Q What source would you use to buy her out?

3 A I don't feel comfortable disclosing that.

4 Q Why don't you feel comfortable?

5 A Well, like I said, well, let me explain and then

6 we'll go from there. So I had somebody approach

7 me that said, Charlie, why don't you think about

8 selling off an interest in the house. And I'm

9 like what do you mean?

10 And he said, look, I'll give you \$230,000.

11 I will give you \$230,000, right, and you don't

12 have to pay me back, but you're going to agree

13 that within four years you're going to either

14 refinance the house and give me my money back plus

15 10 percent, right, or you sell the house and you

16 give me my 10 percent.

17 So it's a way to sell off part of your

18 house and for somebody that has extra cash it

19 would be a means for them to then be able to make

20 a higher interest rate, so anyway.

21 (Exhibit 5 marked.)

22 BY MS. MILFELD:

23 Q Do you remember seeing the marital balance sheet

24 in the mediation? I am showing you what is marked

25 as Exhibit 5.

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1 Q Well, what you have been shown is a real number of

2 \$91,000.

3 A Uh-huh.

4 Q Would you want the \$91,000 paid in total or not?

5 A Yes, but open to offers, other offers.

6 Q Would you be willing to allow Allie to retain the

7 home until after Camryn graduates high school?

8 A Under what conditions?

9 Q Would you agree to stay on the current loan to

10 allow Alyson and Camryn to live in the marital

11 home?

12 A Under certain conditions that we'll include in our

13 proposal.

14 Q What conditions are you talking about?

15 A I don't have them all. I haven't figured it out

16 yet.

17 Q When are you going to figure this out?

18 A I guess when I do. Look, again, I want to give it

19 the utmost attention. I can tell you -- I have

20 told you to make the money I have to make to keep

21 my family fueled I am working 80 hours a week, and

22 on top of this I am getting all this and I am

23 getting bombarded.

24 It's overwhelming, it's very challenging,

25 and it's very difficult. I don't have a part-time

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1 job. But I will make an effort to try to get it
 2 within the week and go from there.

3 Q **Are you aware that Camryn wants to attend**
 4 **Niwot High?**

5 A Absolutely.

6 Q **How important do you think it is that Camryn**
 7 **attends Niwot High?**

8 A I think it's really important. I think I'm
 9 scared. You know, I'm really scared about it. I
 10 kind of like these other more, you know, more
 11 contemporary schools dealing with trans and all
 12 that kind of stuff, but they want to do it, and I
 13 am going to support them 110 percent.

14 Q **Do you think that if Alyson isn't able to keep the**
 15 **marital home that she and Camryn will be able to**
 16 **find replacement housing to allow Camryn to keep**
 17 **going to Niwot High?**

18 A Yeah, we just found it. She just got it offered
 19 to her yesterday, two days ago, a really great
 20 house that I think would be totally affordable and
 21 it would be awesome by Pat Murphy, the realtor.

22 Q **And has Pat given the offer to Alyson?**

23 A Yeah, she said she did. She told me about it, and
 24 I said, hey, this is perfect. I love this house.
 25 If Allie doesn't want it, I would consider it

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1 that's something that's an option for her, then I
 2 think that's great, but you guys have made it so
 3 clear to me that she doesn't want anything to do
 4 with me. She doesn't want my shit on her stuff,
 5 and that's fine. So then, you know, that's where
 6 I kind of stay, you know, for my own mental
 7 health, you know.

8 And I want to add why I've been slow about
 9 all this which I respect and understand is because
 10 of the problems that were underlying and why the
 11 PRE and why the reunification.

12 The reunification, if conducted well and I
 13 think it is getting there, will help my family.
 14 It will make me a lot more feeling comfortable
 15 that there's not any underlying things going on
 16 behind my back that is harming my relationship
 17 with my child.

18 So when I know those things are there, and
 19 I am not battling with Allie about, you know,
 20 e-mails that she sends instead of telling Camryn
 21 to deal with me direct sending e-mails to lawyers,
 22 I'm going to be -- I'm a good person.

23 I want to help Allie. I have always wanted
 24 to help Allie. So a lot of it is up to her, do
 25 you know what I mean, how generous I want to be,

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1 because if we have to sell the house, I need to
 2 find a place, but I wanted Allie to have the first
 3 offer for just the reasons I have told you.

4 Q **When you were talking about the four-year plan**
 5 **that allows you to keep the house, who were you**
 6 **talking about?**

7 A No. That's what was asked of me that I want to
 8 keep the house for four years and then sell it or
 9 something in her offers or some conversations that
 10 I've had with her. That came from her.

11 Q **Would you be willing to do that?**

12 A Like I said, I will try to include a means for
 13 Allie to live in the home, but right now I just
 14 don't see it viable financially for her to keep
 15 the house.

16 Q **How so?**

17 A Or me for that matter.

18 Q **Why do you think it's not financially viable for**
 19 **her to keep the house?**

20 A Based on the numbers we have seen from you guys, I
 21 don't think she's going to be -- unless she gets a
 22 job and makes, you know, 60 grand, I think it
 23 would be a challenge for her, but it's not my
 24 thing.
 25 If we do the numbers and we agree to it and

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1 but when you have somebody that is, you know,
 2 spending the money and forcing me to do this
 3 shit -- sorry. It is what it is.

4 Q **Has Camryn told you that he wishes to do**
 5 **gender-affirming hormone therapy?**

6 A Fuck. I'm not going to answer the question. Yes,
 7 of course they have.

8 Q **Do you support Camryn receiving gender-affirming**
 9 **hormone therapy?**

10 A I have not -- I am going to give you the speech
 11 that I have given to my family and that I have
 12 given to everybody else.

13 I have a great deal of respect for the lead
 14 doctor at the True Center in Denver at
 15 Children's Hospital, and I have read so many
 16 different articles on it from legitimate research
 17 things, and when the time comes which is
 18 approaching then I will have several discussions
 19 with that doctor, and I am going to rely heavily
 20 on them to guide me through this process.

21 And Camryn, you know, right now it's scary
 22 because it's irreversible, and there's plenty of
 23 precedent for kids changing their mind later, and
 24 to take a girl and say go testosterone and I am
 25 going to ruin your chance of ever having children

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<p style="text-align: right;">Page 153</p> <p>1 and ever being able to do it is a decision I would 2 not put on any parent, but I can promise you and 3 Allie and I have promised Camryn that it will be 4 the most important decision of my life, and I will 5 do everything I can to make it a good one.</p> <p>6 Q Is this an area of conflict between you and 7 Alyson?</p> <p>8 A You know, honestly, I don't necessarily think it 9 is. I'm scared shitless over her, you know, just 10 saying, you know -- because you think about it. 11 If the mom says yes and the dad says no, you can't 12 have it happen. You have to have both parents 13 agreeing to it, so if that happens, that will just 14 destroy my relationship.</p> <p>15 Q What is Alyson's position now?</p> <p>16 A I have no clue.</p> <p>17 Q Do you think Camryn should have a say in this 18 decision?</p> <p>19 A I think Camryn does have a say in the decision and 20 they talk to the doctors and the therapist. The 21 therapist has to write a letter, you know, that 22 says certain things.</p> <p>23 They can't say take the hormones, they 24 can't do all this kind of stuff, but they do have 25 to write a letter, and the doctor at the</p>	<p style="text-align: right;">Page 154</p> <p>1 True Center, you know, has their own process 2 before they will ever even give it to somebody, so 3 I am really relying on the professional to make 4 these calls and trying not to leave -- you know, 5 all the chatter in my brain from my family and 6 friends, you know what I mean, because it's 7 controversial.</p> <p>8 Q If Alyson agrees to the therapy and you disagree, 9 how are you going to resolve this conflict?</p> <p>10 A I am going to rely heavily on Jill, the 11 reunification specialist, to help at least guide 12 that process and then possibly the DM as well.</p> <p>13 It has to be -- look, if we don't -- in my 14 mind, it has to be a unanimous decision that we 15 make together. We might not agree and Allie might 16 want it and me not wanting it, but if it was 17 reversed I would still think it has to be one 18 decision that we present to the child, not two, 19 and that's the part that I worry about, and that's 20 the healthiest thing to do.</p> <p>21 So behind the scenes two parents might 22 disagree, but they agree that you're not going to 23 get it and they have to have a unified front to 24 present to that child in order to avoid parental 25 alienation over the decision, and that would be my</p>
<p style="text-align: right;">Page 155</p> <p>1 wishes, and when the time is right that will be 2 spoken to Allie that way.</p> <p>3 Q Who does Camryn currently see for therapy?</p> <p>4 A There's a couple people. There's Lee and Lee 5 spelled two different ways. One is at the 6 Umbrella Collective, and that's their regular kind 7 of therapist they see weekly, and then their 8 psychiatrist that they see, Lee, they see, I 9 think, monthly.</p> <p>10 Q Do you support Camryn seeing all these people?</p> <p>11 A Yeah, totally, and I agreed to it in the parenting 12 plan.</p> <p>13 Q Do you speak to any of these professionals 14 regarding Camryn?</p> <p>15 A I speak to one, but I am not allowed to speak to 16 the other.</p> <p>17 Q Why aren't you allowed to speak to the other, and 18 who is that person?</p> <p>19 A That's Lee. That's Camryn therapist, and Camryn 20 doesn't -- you know, they like their privacy about 21 it, and that's in the State of Colorado. That's 22 the law.</p> <p>23 Q Do you agree with Camryn's decision to limit your 24 participation with Lee?</p> <p>25 A Yeah. Look, there's been times when I really</p>	<p style="text-align: right;">Page 156</p> <p>1 wanted to talk about this whole transgender thing 2 because they are transgender themselves, and I 3 would love to have that kind of discussion with 4 somebody that has dealt with it a lot of times, 5 but I have other sources so I'm not worried about 6 it, and I do think it is important that Camryn has 7 that person to champion them.</p> <p>8 Q Do you know if Camryn has been diagnosed with any 9 mental health issue?</p> <p>10 A I think Camryn came to me and said that they 11 thought they might be bipolar. I definitely think 12 ADHD is a possibility. One in three children it's 13 most likely they do.</p> <p>14 Camryn is the one that I see the most of me 15 in. I have seen definitely several times 16 emotional deregulations. I have brought that up 17 to their psychiatrist, and the time isn't right 18 now, but at some point I would like, you know, a 19 formal diagnosis done on Camryn, and why is 20 because I lived my life as a child that was very 21 isolated and a lot of problems as a child because 22 of my undiagnosed ADHD. I just don't want it to 23 happen to my child.</p> <p>24 Q Have you requested that Camryn receive a formal 25 diagnosis?</p>

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1 A No.

2 Q **Why not?**

3 A You know, I talked to Allie about it at one point

4 and she said she didn't think it was the right

5 time, and I talked to the psychiatrist, and she

6 said, look, you know, I think we're good right

7 now, if down the road you want to do it, so I'm

8 respecting those decisions.

9 Q **Has Camryn actually been diagnosed with any mental**

10 **health issue?**

11 A No.

12 Q **Does Camryn take any medication for any mental**

13 **health issue?**

14 A Yes. They take the same medication I do,

15 Lamotrigine, and then they take an anti-anxiety

16 medication as well.

17 Q **Do you know how often and what the dosage is of**

18 **these medications?**

19 A Yeah, it's actually -- I think Lamotrigine is 150,

20 and then the other one I'm not sure.

21 Q **Do you agree with Camryn taking this medication?**

22 A Uh-huh. Yeah.

23 Q **Is that a yes?**

24 A Yes.

25 Q **Does Alyson to your knowledge agree with Camryn**

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1 respect that.

2 Q **You're not going to go to the appointment then?**

3 A Not to the doctor's appointment.

4 Q **Okay. Thank you.**

5 A Correct. I have no intention, never have, never

6 implied it, never would do it, even just show up.

7 Q **Did you ask to drive Camryn to reunification**

8 **therapy?**

9 A Yep.

10 Q **Why did you ask to do that when there are**

11 **protocols that Jill set forth that say that you're**

12 **not supposed to do that?**

13 A There was not protocols set for that.

14 Q **Have you reviewed all the protocols?**

15 A Yeah. No, it just says when they would arrive and

16 when they would -- you know, they would arrive

17 ten minutes before. They would go in with -- they

18 would go in ten minutes before I did, and then I

19 would go in and then we leave.

20 And again, I'll talk to Jill. I already

21 sent her the e-mail on it and made sure that I

22 didn't do anything or whatever, but as soon as I

23 got that e-mail from you, you know, I immediately

24 summarized and sent the actual thread to Jill and

25 said, Jill, let me know if I was out of line.

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1 **taking this medication?**

2 A I would assume yes, but I don't know.

3 Q **How would you describe your current relationship**

4 **with Camryn?**

5 A I think we're on the right path. I think that,

6 you know, reunification, I think we've only been

7 two times, but we have our third one tomorrow, and

8 we are dealing with real experiences and real

9 things, so I'm feeling really good. I'm feeling

10 really good. Camryn is very protective of their

11 mother and I know that too, and that's been very

12 clear, and I respect that. I understand it, I

13 guess.

14 Q **Does Camryn have a medical appointment on Friday?**

15 A No. We have a meeting, our weekly -- our weekly

16 meeting with the reunification specialist.

17 Q **Are you planning to go to the appointment on**

18 **Friday?**

19 A It's for us. No, you're talking about the e-mail

20 that -- no. So we have Friday at 1:30. We have

21 our reunification. At 3:15 Camryn has another

22 appointment with Dr. Parker in Broomfield for

23 their knee. They have some inflammation in their

24 knee and was going to go to that, and I wanted to

25 go to that, but Camryn didn't want me to, so I

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1 And so if she tells me there's a protocol

2 in place that said Allie -- but the protocol I

3 read just -- you know, did it assume it? You

4 know, and we talked about it. You know, the

5 complication of reunification is that she was

6 shocked that we were even talking. Jill was like

7 surprised that Camryn and I were having -- seeing

8 each other, were talking, were texting, you know,

9 and if I was wrong, I was wrong, and Jill will

10 snap me right -- you know, I want her to.

11 Q **What do you hope to accomplish in reunification**

12 **therapy?**

13 A I think just establishing really good

14 communication agendas with my children and to be

15 able to identify, you know, the things that I need

16 to do and to be able to identify the influence

17 that Allie is having on our relationship, just all

18 the things that reunification is about, and if you

19 read Jill's stuff, you know, it kind of outlines

20 exactly what its goal is.

21 Q **What have you done so far in reunification**

22 **therapy?**

23 A Not much. I mean, we have learned about setting

24 boundaries. You know, we've agreed that we would

25 only text each other every other day, that we

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1 wouldn't talk about divorce.

2 You know, like I said, we've only gone

3 twice, but like I said, what I've gotten out of it

4 so far is, you know, I need to slow my role

5 sometimes because I can be overwhelming to people,

6 and I know that's true with my children, that time

7 and patience is really important, but I think

8 Camryn would also -- we also learned that, you

9 know, the big thing for me and what I was hoping I

10 would get out of it right away was that it's okay

11 for me to say I need a time-out, but it's also

12 important that I also say, hey, let's talk about

13 it tomorrow, that we always have a follow-up, and

14 that's a very common parenting style that

15 everybody respects their time-outs, but they

16 always have a time to come back to discuss things.

17 And Jill was flawless at explaining that to

18 Camryn, and so now we have some processes that

19 were really frustrating for me in the past that we

20 have really some good guidelines for it, and

21 Camryn seems to be all on board with it, so I'm

22 really psyched by that.

23 Q **How did it come about that you agreed to text**

24 **every other day?**

25 A What happened was Camryn was feeling -- Camryn

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1 with Camryn?

2 A No. You got to remember that, you know, when they

3 fled the house, right, and packed up and moved

4 away that there was really incredible anxiety for

5 me.

6 Allie was definitely in her full fight

7 mode, and a lot of things were being done and said

8 and it was very confusing, and Camryn carries a

9 lot of resentment about the fact that I'm in the

10 house and he's not, and despite me offering at one

11 point to switch houses, offering at one point the

12 5 2 2 5 without any conditions, you know, so we're

13 here because of lack of communication, lack of

14 empathy, lack of compromise, and it is what it is,

15 and it's tough on the children.

16 I tried not to talk about it, but

17 sometimes, you know, Camryn came at me and get the

18 fuck out of my house, get the fuck out of my

19 house, get the fuck out of my house. And I didn't

20 know what to say, and at that point I didn't say

21 anything.

22 I just froze, my own freeze, and I talked

23 to a therapist and we try to process it. We know

24 me being in the house is, you know, not good for

25 the child, and so me getting out and letting them

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1 said that I overwhelmed him with some of the texts

2 that I had sent, so that was a discussion that

3 Camryn had that said, you know, "I was feeling

4 overwhelmed, dad, by your text messages."

5 And although I didn't understand it, I'm

6 still respecting it as Jill has told me, you know.

7 And so we're trying to understand, like I said, in

8 my opinion that there is a lot of mirroring going

9 on, right, between Allie and Allie projects a lot

10 of her fears and a lot of her anxieties around me

11 and a lot of all that onto Camryn, and that's what

12 we are trying to figure out.

13 So some of the stuff that Camryn has

14 against me is concerning, and we'll see what's

15 legitimate and what's not, and like I said, I'm

16 ready to take my blows, and a great example is if

17 I was wrong about asking to drive her down because

18 some protocol existed, then I'll be the first to

19 say I was wrong.

20 Q **What concerns are you referring to that Camryn**

21 **has?**

22 A What you just said about driving them, that I was

23 breaking protocol by asking to drive.

24 Q **With the agreement about not talking about the**

25 **divorce, have you previously discussed the divorce**

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1 have it, you know, I'm torn on it, especially when

2 Allie asked me that.

3 You know, it was really hard. I took

4 two days to answer, and I still don't necessarily

5 feel great about the answer, but that's when that

6 house popped up, this really cute just like

7 goddamn that's a great house for them.

8 No, it's a different one. So the cottage

9 was the one they're in right now. That's referred

10 to as the cottage. All I know is I went into the

11 house. It was great. It was three bedrooms. It

12 wasn't big like ours, but it had a great yard for

13 the dogs. How much money is it?

14 MS. GOFF: Let's go off the record.

15 THE WITNESS: All right. I'm sorry.

16 (Break taken.)

17 (Exhibit 6 marked.)

18 BY MS. MILFELD:

19 Q **I am showing you what is marked as Exhibit 6,**

20 **witness disclosures. On page 2 you have endorsed**

21 **Nicol Pate. When was the last time you --**

22 A Oh, these are all the different people, the

23 witness list, right? Sorry. Ask your question.

24 I apologize.

25 Q **This is the witness disclosure that was dated**

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1 June 19th, 2023, and you endorsed Nicol Pate.
 2 Do you plan on calling Ms. Pate?
 3 A I don't know. Do you know what the law is for
 4 therapists that have -- you know, they can't
 5 disclose any information, right, legally? Do you
 6 know?
 7 Q Well, the question is do you plan on calling
 8 Nicol Pate as a witness.
 9 A If we go to court, yes.
 10 Q What will Ms. Pate testify about?
 11 A Allie's mental condition.
 12 Q When was the last time you spoke to Ms. Pate?
 13 A It was right before Allie left the house.
 14 Q What do you expect Ms. Pate to say specifically
 15 about Allie's condition?
 16 A She would confirm that she saw symptoms of
 17 unresolved trauma that could lead to a distorted
 18 reality that could lead to inaccurate information.
 19 Q Is that what Ms. Pate told you before Allie left
 20 the house?
 21 A You asked me what I would ask. I'm not really
 22 sure, to be honest with you.
 23 MS. GOFF: Charlie, you need to get off
 24 of your computer.
 25 A All right. All right. Sorry.

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1 that conversation and the next month or so of
 2 reunification in regards to really what is seen
 3 and what is brought to the attention of, you know,
 4 possibly lawyers, possibly whatever.
 5 So it's really conducive to the outcome and
 6 where we are with reunification, and I'll say it
 7 again. I wish reunification started months ago
 8 because I think we would be over with this, and I
 9 am using reunification in regards to
 10 understanding, diagnosing and coming up with a
 11 really solid game plan to allow me to move forward
 12 in a healthy relationship with my child without
 13 any interference from Allie.
 14 So there's still this thing that affects
 15 all aspects of my life and my children's
 16 relationships, and that's what unification is
 17 about. It is why we got the contract changed from
 18 "father and minor child" to "parents and minor
 19 child," and so I don't know. Do I have clarity on
 20 the relevance of calling them? Not totally, so I
 21 can't answer the question for you.
 22 Q How does Allie interfere with your relationship
 23 with Camryn?
 24 A I will use the most recent example is that what
 25 Ally could have very easily done with Camryn was

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1 No, I'm not going to call either. I don't
 2 think I'm going to call any of the therapists.
 3 The only one that might make some sense to call
 4 would be Jill.
 5 Q You just said a few moments ago --
 6 A Yeah, I know.
 7 Q -- that if we go to court you would call
 8 Nicol Pate, yes. And then you now say, "No, I'm
 9 not going to call them."
 10 A Yeah, I had to think about it, so I apologize.
 11 Welcome to my brain. Yeah, so on the record I
 12 don't think I have any intention to call Nicol.
 13 Q Do you have any intention to call Leah Fox?
 14 A Possibly.
 15 Q What would Ms. Fox testify about?
 16 A I'd explain her role with me. It's a translator
 17 that can speak professionally to certain
 18 behaviors.
 19 Q A translator of what behaviors?
 20 A Certain specific behaviors of Alyson's.
 21 Q What is the relevance of her behaviors to the
 22 issues left in this divorce?
 23 A So let me tell you why this question is a very
 24 difficult one to answer straight up is that Jill
 25 and Leah will be talking, and it really depends on

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1 to say, hey, look, you really need to deal with
 2 this with your dad. Why don't you tell him how
 3 you're feeling.
 4 But instead she, you know, took it right to
 5 the attorneys and said whatever she said and
 6 instead of doing the healthier thing, so that
 7 makes it okay for Camryn to feel what they feel
 8 and to be frustrated, and it doesn't promote
 9 anything healthy between our communications, so
 10 that's one example.
 11 Q What is another example?
 12 A When Camryn would come to the house and Camryn
 13 would get frustrated over something or another,
 14 then Camryn would text mom and mom would show up
 15 at the front of the house, honk her horn, and
 16 Camryn would run out of the house, and I would ask
 17 Allie please quit doing that. That interferes
 18 with my relationship with my child, so another
 19 example.
 20 Q Do you think that Allie's unresolved childhood
 21 trauma has had an impact on your relationship with
 22 Camryn?
 23 A Absolutely.
 24 Q How?
 25 A I just explained two ways.

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1 Q Do you think her unresolved childhood trauma has
 2 made you and Camryn less close?
 3 A Absolutely.
 4 Q What do you think needs to happen in order for you
 5 and Camryn to be closer?
 6 A I think reunification is going to really give us
 7 the tools to be able to, you know, move forward in
 8 a positive light.
 9 I mean, ultimately I am worried and at
 10 least what I know to be true and what I am told is
 11 that Allie's current posture will continue for a
 12 while and maybe forever, and I truly believe that
 13 treatment is really the only real answer for me to
 14 establish a strong relationship with my kids, the
 15 younger ones.
 16 The older ones I think were already on our
 17 path of identifying certain things. My middle son
 18 who lives with me is already seeing signs that he
 19 is -- you know, I am slowly bringing him in to my
 20 truth and he is understanding it on some level.
 21 So, look, again, I am going to use the term
 22 intergenerational trauma. If you read about it,
 23 if you learn about it, if you study it, you will
 24 realize that there is so many different things
 25 that unresolved trauma has and affects a family,

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1 include diagnosing Alyson?
 2 A No, but it does include her thinking that she
 3 should get one, so it does. If she felt that
 4 there was something more there she could recommend
 5 an evaluation or an assessment on Allie if she so
 6 felt.
 7 Q Have you thought about the possibility that you
 8 are wrong about Alyson's diagnosis?
 9 A I think about it. Like I said, I have spent more
 10 money and time trying to get somebody to tell me I
 11 am wrong than I have trying to tell me I'm right.
 12 I hate it, and I am reminded of it all the time,
 13 so I wish I was wrong. I really truly, truly --
 14 and all I have ever asked for was just an
 15 evaluation.
 16 I said, Allie, prove me wrong, please.
 17 You know, she says, "I put the kids first." But
 18 if you understood complex PTSD or if you
 19 understood the effects of unresolved trauma on
 20 relationships, adult relationships, you would
 21 realize that it was worthy of an assessment.
 22 Any doctor that ever looked at her history
 23 would want it immediately, and the fact that when
 24 she had this thing happen, the flashbacks and she
 25 went to a therapist, this is her words, and did

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1 period, the end.
 2 No different than ADHD does too. It has
 3 its own list, but it's what are you willing to do
 4 with that information in order to stop
 5 intergenerational trauma that is responsible for,
 6 Jesus, suicides and death and I have seen
 7 firsthand.
 8 Q Since you do not plan on calling Ms. Pate as a
 9 witness, will you agree to withdraw Ms. Pate?
 10 A No.
 11 Q Why not?
 12 A Because like I said, I need those two people to
 13 talk. If Jill identifies and says, oh, shit, this
 14 makes a lot of sense, right, and she starts seeing
 15 that, then it's her job to make sure before she
 16 comes and makes any assessment or makes any
 17 recommendation that she is going to want to gather
 18 as much information as she can.
 19 Nicol houses a lot of information because
 20 she is the only person outside of one person in
 21 Boulder that we are trying to find that has
 22 conducted the MDR on Allie, but she is the only
 23 one that has had personal one-on-one relationships
 24 as it relates to trauma and Allie.
 25 Q Do you understand that Jill's role does not

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1 EMDR, she said it was non-conclusive.
 2 I would absolutely agree. One session
 3 would be inconclusive, but we also know at least
 4 three EMDR specialists that I talked to about
 5 this. I said would you tell somebody that they
 6 were not sexually abused by one meeting, and they
 7 said absolutely not, and so I would love for her
 8 to finish the EMDR.
 9 Q Help me understand. If Ms. Reiter does not say or
 10 does not give a recommendation that Allie needs an
 11 evaluation, then you plan on calling these two
 12 witnesses to talk about her mental health issues?
 13 A No, look, this is the part. I want to personally
 14 settle this sooner than later, right, and this is
 15 what time buys me.
 16 Time buys me more time for Jill to learn
 17 about the family dynamic, to see the problems and
 18 to make recommendations.
 19 Now, again, am I a pipe-dream to think that
 20 Allie one day is going to wake up and say, hey,
 21 Charlie, you know, I think I probably do need some
 22 treatment? You know, there has been days in our
 23 past where she has gone in and out of this, so I
 24 think it's probably a pipe-dream at this point for
 25 me.

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1 Q Are you aware that Ms. Reiter has told Allie that
 2 she doesn't need any further treatment or doesn't
 3 need an evaluation?
 4 A No. I can tell you that she -- again, no. No one
 5 has ever told me that, and Jill did say to me that
 6 she didn't think -- she didn't want to read
 7 certain things that I had sent her that came from
 8 Leah Fox and some other stuff and that she was
 9 trying to make her own opinion about everything,
 10 right, without seeing it.
 11 And then we had a very come to -- I don't
 12 want to say come to Jesus, but we had a very
 13 serious discussion about it, and I explained
 14 exclusively why I took this path with her, and at
 15 that point what she said at the beginning of the
 16 conversation changed, and she said she would then
 17 begin the process of reading the information I had
 18 given her and potentially meeting with the
 19 therapists that I want her to meet with so that
 20 she clearly understands my side of the story, and
 21 she said she was going to do it, so that was last
 22 week, and I will talk to her tomorrow and I will
 23 ask her, but I know what her contracts say.
 24 Q Before you and Alyson separated were you aware of
 25 Alyson being in therapy?

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1 It's real. Intergenerational trauma is
 2 responsible for so many suicides, so many
 3 different things, so if you want to call that
 4 obsessed.
 5 You know, I'm going to do everything I can
 6 to protect my children, and that's my truth, and I
 7 will forever hold a light that she will find help.
 8 Do I think I can get her the help she
 9 needs? I really don't. I mean, look, this is a
 10 woman that has lost so much and so many people in
 11 her life, and I can tell you the three closest
 12 people she has ever had she has alienated and she
 13 has cast away.
 14 Q Do you accept that you've played a role in your
 15 relationship with Camryn being less close?
 16 A I think, yeah, absolutely, I do.
 17 Q What role have you played?
 18 A I think that the ADHD part of it, you know,
 19 definitely, you know, and not being there all the
 20 time for him was very challenging for them, and
 21 that's the big part of Jill is to be able to
 22 decipher, and what has been a challenge for me is
 23 to be able to say what is my shit, what is
 24 Allie's, where is there interference.
 25 And again I will go back to why it was so

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1 A She's been in therapy for 12 years. She has been
 2 working with a therapist that was originally our
 3 couples therapist that we found in our town, but
 4 her background is in -- she doesn't have any
 5 experience in understanding trauma, but when our
 6 therapist talked one of the big issues that was
 7 present was that Debra Fitzgibbons said, look, it
 8 took me 12 years to get Allie to trust me, so
 9 having Allie in the seat is quite an
 10 accomplishment for her and something that, you
 11 know, I think is great.
 12 Do I think Debra would contest to that
 13 Allie does not have complex PTSD? No, I do not
 14 think she would. And if she did, then I would
 15 take that to heart for sure, but she has never
 16 been able to do that even though I have asked
 17 Allie about it.
 18 Q Would it be fair to say that you are somewhat
 19 obsessed with the idea of Allie being diagnosed
 20 with unresolved childhood trauma?
 21 A Not obsessed. Concerned for sure. You know, it's
 22 like I said. If you understood it well enough
 23 like I do, then you would understand what it can
 24 do to a family and what it has done to my family
 25 and what it potentially could do to my kids' kids.

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1 important for me to surround myself with the best
 2 possible therapists and information insight so
 3 that I could make sure that I sat before you and
 4 before anybody and could speak in an educated
 5 manner.
 6 Q Would you say that Alyson has ever alienated you
 7 from Camryn?
 8 A Absolutely.
 9 Q How?
 10 A I've just given you several examples.
 11 MS. GOFF: I think it's been asked and
 12 answered.
 13 A Yeah.
 14 BY MS. MILFELD:
 15 Q Do you think that Alyson is currently alienating
 16 you from Camryn?
 17 A Yeah. I think that e-mail was a good example of
 18 alienation. The child goes to the mother and
 19 says, mom, dad is texting me and trying to da, da,
 20 da, da, da, right?
 21 So mom says, oh, don't worry about it, I'll
 22 take care of it. And she fires off an e-mail.
 23 Camryn goes back to the room and, you know,
 24 luckily their computer arrived. The brand-new
 25 computer arrived at the house, and I knew, all

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1 right, shit, and I didn't want to communicate
 2 anymore after that, but I did, and everything was
 3 good.

4 **Q Do you acknowledge that you have sent a bunch of**
 5 **text messages to Alyson about the relationship**
 6 **with Camryn and that you've texted her non-stop**
 7 **about that?**

8 A I think in the last three months there's maybe a
 9 few, a lot less texts. In the past I think the
 10 first two months, two or three months I think that
 11 I was definitely -- I was definitely -- I don't
 12 want to say overwhelming. Well, I would say it.
 13 I was probably overwhelming with texts, but
 14 I don't think anything -- like I said, dealing
 15 with something like this as my therapist will tell
 16 me, Charlie, you need to give yourself a break.
 17 There is not many men that would have held on as
 18 long as you did, and you need to give yourself a
 19 break.

20 **Q How many text messages did you send to Alyson**
 21 **yesterday?**

22 A One. Here, let's look. All right. Yesterday.
 23 This is where it starts yesterday, right? Okay.
 24 So here we go.
 25 So the only one when I first saw the

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1 meant for Cam."
 2 "Yes, I know. Please send these texts to
 3 him directly. I prefer not to be in the middle."
 4 And then I said, "Why did you get in the
 5 middle and send your lies to your attorney? Just
 6 so very sad."
 7 And that was it. And then what do I tell
 8 Camryn? What are you going to tell the attorney
 9 next time I try and communicate with him?
 10 And at that point I was like -- at that
 11 point there was nothing -- I still don't see
 12 anything weird about it, right? I asked a couple
 13 questions. Maybe I was a little sarcastic which
 14 I'm guilty of, but it still was like what do I do?
 15 And I can be honest with you. You know,
 16 when you sent a text to your kid, and then you get
 17 a letter from attorneys, do you know what I mean,
 18 that didn't have all the truth to it, then I
 19 freeze in the headlights because I don't want to
 20 fuck up. And again, like you said, if it's
 21 somewhere in that document, then I feel bad.

22 **Q How many text messages did you send her yesterday?**
 23 **That was the original question.**

24 A Two. I just read it. When you say text messages,
 25 okay, count, right? One, two. She sent me one,

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1 Dr. Perkins on the calendar, it wasn't on our
 2 shared Google calendar. It was on her iCal, and
 3 that's another story, but it was on -- I couldn't
 4 tell who it was for.

5 I wasn't sure if it was for Camryn or for
 6 Allie because they -- she has her personal stuff
 7 and the kid's stuff despite what she said in your
 8 e-mail.

9 So I just asked her who is that for? And
 10 she said -- and I said I assume you, because I
 11 really thought it was for her. She said Camryn.
 12 And then I asked can you get me the address of the
 13 doctor? And that was it.

14 Now, what I did do right after that is I
 15 accidentally texted what I texted Camryn. Hey,
 16 your computer just arrived. We can set it up, a
 17 time for us to set it together. My only
 18 request -- and then it is all yours. This evening
 19 works for me.

20 And then I caught that and I said, oh, so
 21 the above text was for Camryn. Sorry.

22 And then Allie said, "Please send to Camryn
 23 directly."
 24 And I didn't understand that comment, and I
 25 just responded. "I was just telling you it was

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1 two, three.

2 **Q No, no, no. That's not my question.**

3 A Okay. Mine. Okay. Separate? They flow
 4 together, so two, three.

5 **Q So let me be very clear. A text message is when**
 6 **you write someone and then perhaps they respond,**
 7 **and so each time you make a statement, that's a**
 8 **text message, so how many times did you text**
 9 **Alyson yesterday?**

10 A One, two, three, four, five, and to her four. I
 11 will be glad to -- do you want me to cut and paste
 12 and share this whole thread with you? I'd be glad
 13 to. Just let me know.

14 **Q What would you think Alyson's motivation is to**
 15 **alienate you from Camryn?**

16 A A parent that has gone through what Allie has gone
 17 through in her past becomes very guarded and very
 18 protective of themselves and typically their
 19 children, and any threat or perceived threat that
 20 potentially could resurface that trauma of the
 21 past can be -- they will do anything to avoid
 22 that, so the children become an extension of
 23 herself.

24 **Q I'm going to ask you about --**

25 A And again, like I said, it's a complicated

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1 question. I wasn't expecting this to deal with
 2 all this in this meeting, otherwise I would have
 3 had all these documents printed out and been able
 4 to read you a lot of good answers to your
 5 questions, and I apologize for that.
 6 So I don't know what to tell you, but I can
 7 tell you that in simple terms she will say and do
 8 anything to protect herself and her children from
 9 any perceived threat, period, the end. I have
 10 seen her do it so many different times with all my
 11 kids.
 12 Q Don't you think that most mothers would do
 13 anything to protect their children from a
 14 perceived threat?
 15 A Yes, I do think there is a healthy part of that,
 16 but I also know that there is a very unhealthy
 17 part of it, and that was always the dilemma like
 18 what is normal like Allie is just protecting her
 19 kid, right, but then there's certain things that
 20 have happened that it was like over the top, and
 21 that was the part where there was so much
 22 confusion, and I have examples, you know, that I
 23 can share with my kids. I mean, I can share with
 24 whoever.
 25 Q You said generally how someone with trauma might

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1 schedule to be accomplished?
 2 A Oh, when do I think we would start it? Whenever
 3 Jill thinks it's the right time is what I have
 4 agreed to.
 5 Q Do you think that's fair?
 6 A I think it's too early in the game to decide if
 7 it's fair, but I definitely agreed to it. She
 8 won't put a -- her clear statement is I don't put
 9 any timeframe on this stuff. And I think it's
 10 complicated, and do I think we will have 5 2 2 5
 11 tomorrow? No, I don't. And that saddens me, but
 12 it is what it is, and patience in this scenario is
 13 very important.
 14 (Exhibit 7 marked.)
 15 BY MS. MILFELD:
 16 Q I am showing you what is marked as Exhibit 7.
 17 This is the Fleckenstein report as of
 18 February 10th, 2023.
 19 A What's the Fleckenstein report? Oh, the
 20 appraisal?
 21 Q Exhibit 7 is the appraisal.
 22 A Yeah.
 23 Q Have you reviewed this?
 24 A Yep.
 25 Q Do you agree with the appraisal of 990,000?

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1 respond, but what would Alyson's motivation be to
 2 drive a wedge between you and Camryn? Help me
 3 understand that.
 4 A Like I said, it's done subconsciously which is the
 5 sad part about it all. I don't think on the
 6 surface she has any intention at all to do that,
 7 but I think subconsciously she does these rescuing
 8 things. She does so many different things that
 9 causes it.
 10 I don't think she has any purpose to it. I
 11 honestly believe when she says I really want them
 12 to have a healthy relationship that she really
 13 means it, and I think when she says I want him to
 14 have 50/50, I think she believes it.
 15 But I also think she struggles with it, and
 16 this is the part where, again, if Leah was in this
 17 room with me I would say, Leah, can you explain
 18 that? And she would do a really incredible job of
 19 it, you know, so that's my answer to you. It's
 20 something done subconsciously. So to answer your
 21 question, I can say I think she does it
 22 subconsciously.
 23 Q What do you think the parenting time should be?
 24 A 5 2 2 5, just what we agreed to, 50/50.
 25 Q How long do you think it should be for that

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1 A I talked to a realtor the other day and, yeah,
 2 they think it's right, right in line with it. I
 3 thought it was high at the time. I think I did
 4 too good of a job of fixing up the house, but yes.
 5 Q What realtor did you speak with?
 6 A Tara, the two, the mother and daughter team that
 7 Allie would like me to hire or like us to hire.
 8 (Exhibit 8 marked.)
 9 BY MS. MILFELD?
 10 Q I am showing you what is marked as Exhibit 8, your
 11 sworn financial statement.
 12 A What's your question about it? Obviously, it's
 13 changed.
 14 Q When you completed this statement on January 19th,
 15 2023 was it an accurate statement of your income,
 16 monthly expenses and liabilities?
 17 A Jesus. It was a while ago. I mean, I took it
 18 very seriously when I filled it out, so I am
 19 assuming. I mean, obviously there's certain
 20 things that have been adjusted, but everything
 21 else I would assume was accurate at the time.
 22 Q On page 1 you say that you are employed 60 hours
 23 per week. How many hours per week do you work
 24 now?
 25 A Probably 70.

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1 Q What is your weekly schedule?

2 A When you say weekly schedule like what do I do

3 like when do I go to the office or when do I get

4 up? I get up at 7. I walk the dogs until around

5 8. Then I have breakfast, and then I hit the desk

6 at 9 and I will work until 1 or 2, grab something

7 to eat, go back and work until, I don't know,

8 whenever.

9 You know, sometimes Allie picks up the dog

10 and I will have therapy thrown in there at some

11 point. And then now that I have June staying with

12 me, my middle son, we have dinner.

13 I stop enough to make his dinner when he's

14 around, and then I go back to work and I will

15 usually work until, I don't know, between 9 and 10

16 PM. So I haven't put a calculator on the numbers

17 that I work, you know what I mean, like I'm just

18 guessing, but that's usually my typical routine.

19 Q Where do you physically work?

20 A I work between my office and my house, but because

21 I have the dogs, now I can go to the office, but I

22 haven't been going to the office very often, but I

23 do on Mondays and Tuesdays because I don't have

24 the dogs on those two days.

25 Q Have you worked remotely in other locations in the

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1 company is losing money. I'm trying everything I

2 can do to save.

3 Q Did you make the decision to sublease the space

4 with or without Alyson's input?

5 A I let her know.

6 Q By letting her know, you mean you made the

7 decision to sublease the space without her input?

8 A She had had no issue with it in the past,

9 you know. And again, I am trying to -- like I

10 said, the communication part of it is so difficult

11 because every time I do something, something else

12 happens, so just like the books. You asked me the

13 question, do you know what I mean, like why didn't

14 you fix it.

15 Well, you know, I wanted to ask Allie all

16 these questions, but it's hard because I don't

17 know if she's going to answer it like no way.

18 You know what I mean? But I felt like this was a

19 no-brainer. You know, it saves \$3,000 a month.

20 Look, I have no issues.

21 You know, that's a good savings for me.

22 And where will I go, you know what I mean, if we

23 sell the house and all that kind of stuff.

24 You know, I looked at Boulder and there's a

25 beautiful co-working space in Boulder called Kiln

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1 past year?

2 A Yeah. I worked in Arizona. My dad had a bad

3 accident, so I was able to work there for

4 two weeks, and it was challenging, but it wasn't

5 bad. I was able to do it.

6 Q Have you worked anywhere else remotely?

7 A No, but I want to go visit my older sister who is

8 unfortunately stage 4 breast cancer and not doing

9 well, so I'm trying to figure out if I can go

10 there for a couple weeks or whatever. I'm just

11 waiting for the doctor's report.

12 Q Are you trying to sublease the Tool Studios office

13 space?

14 A Yep. I hired somebody.

15 Q Who did you hire?

16 A God. Cornerstone, I think, it is. Somebody that

17 the landlord recommended, and they're trying to

18 help as well.

19 Q Are you trying to completely sublease the space so

20 that you don't work there?

21 A Yep.

22 Q Why have you decided to hire someone to help you

23 find a sub-tenant?

24 A I mean, I think it's obvious. You know, like I

25 said, I just looked at the P&L down \$90,000. The

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1 that I just was in for a meeting, and I thought it

2 was awesome, so I really don't have the answer,

3 but I also know they are building a new building

4 in Niwot and they offered me a small space if I

5 wanted it, but it won't be ready for another

6 six months.

7 So I have options, but I do know that --

8 you know, and I have been subleasing offices in

9 the office to offset that as well, so we have been

10 getting \$1,400 a month on the \$3,300 that has been

11 going right into the company.

12 So I've tried to sublease the individual

13 spaces as best as I can, and this person is

14 looking for individuals if they come up as well,

15 so I'm willing to do anything as it relates to

16 trying to save some money.

17 Q Looking at page 2 for your monthly deductions --

18 A Uh-huh. I got it right here. Sorry. Go ahead.

19 Q Has anything changed from your monthly deductions

20 since you filled out this statement?

21 A Monthly deductions? Federal tax, income tax. I

22 have no clue, to be honest with you. I probably

23 took this right off of the payroll paystub.

24 Q Do you think any of this has changed?

25 A No. I think everything -- I mean, my salary I

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<p style="text-align: right;">Page 189</p> <p>1 thought was -- here it says on the cover 2 94,814.50. I thought it was actually higher than 3 that, but I'll take that. 4 Q Do you know how much your health insurance is? 5 A It fluctuates. You know, you negotiate it every 6 12 months or something like that. I think it's 7 like \$1,800 or something right now. 8 Q You're saying \$1,800 a year, correct? 9 A No, a month, something like that, 1,600. 10 Q Going to page 4, how did you calculate these 11 expenses? 12 A Like food and supplies, actually, you know what? 13 I got these from Allie. And the only reason I 14 know that is because there is certain things on 15 here I wasn't even aware of like the Mountain View 16 Fire District thing. 17 You know, Camryn had an accident on the 18 trampoline and we've been paying that off. The 19 dentist and orthodontist stuff, you know, that's 20 not my personal. That's the family's. The riding 21 lesson stuff. 22 Q What are your current transportation expenses? 23 A No clue. I mean, I think they're very low. I 24 don't go very much. You know, I've always joked 25 about my car. It's a 2019 and it only has 30,000</p>	<p style="text-align: right;">Page 190</p> <p>1 miles on it. 2 Q Why didn't you list your transportation expenses? 3 A I don't know. 4 Q During your marriage did you use your salary from 5 Tool Studios to pay for your monthly expenses? 6 A Say that again. 7 Q During your marriage did you use your salary from 8 Tool Studios to pay for your monthly expenses? 9 A Yeah, I assume, yes. Yeah, of course. 10 Q Considering that this statement was filled out in 11 January, do you see anything different or is there 12 anything different on page 4? 13 A Well, I think you brought up a good point about 14 why is there no transportation cost in here. Do 15 you know what I mean? And so I would assume 16 there's probably gas, you know, insurance, for the 17 one car. 18 Q Do you pay the transportation expenses through 19 your business? 20 A You know, I use a Sapphire personal card for gas 21 like that's typically what I do, so I don't know 22 if Allie then pays off that creditcard which is a 23 personal card through the company. I don't know. 24 I mean, I could probably look and see what she 25 does with the Sapphire card.</p>
<p style="text-align: right;">Page 191</p> <p>1 Q How else would the Sapphire card be paid off if it 2 wasn't coming from your company? 3 A It would come from our paycheck, I mean, like I 4 said. Allie told me, and again I think probably 5 there is some truth to it, that we lived off our 6 salaries until all this started happening and all 7 these big expenses started to happen, so I think 8 we were doing fine until she wanted to divorce, do 9 you know what I mean, or separate. 10 Q On page 5 why didn't you list any miscellaneous 11 expenses? 12 A You know, obviously I did a sheet. I did a 13 worksheet, right, that I was given, and then 14 Gaddis and company, you know, took that worksheet 15 and put it all in here, I am assuming, because 16 like I said, I'm not trying to manipulate anybody, 17 you know, and this has a lot of that stuff that 18 you just talked about. 19 Q Go back to page 5. 20 A Uh-huh. 21 Q Under miscellaneous expenses, do you have 22 miscellaneous expenses? 23 A I'm trying to think what that would be. I mean, 24 if I look at all these things, I haven't been to a 25 movie in a hundred years. Charity, I definitely</p>	<p style="text-align: right;">Page 192</p> <p>1 don't do any. Streaming services like my TV 2 stuff, yeah, that would be, I guess, something. 3 Travel, you know, only the trip to Arizona 4 recently. That's the only thing I've done. 5 Investments not part of payroll deductions, no. 6 Home furnishings, I haven't bought anything there. 7 I guess pet care would be something that would be 8 on there. But a lot of this stuff is shared too. 9 That's the weird part, because we both have to do 10 it, right, so they would mirror each other. I 11 think when it was originally asked you would want 12 them to mirror each other. 13 Q How many pets do you have? 14 A We have two dogs. 15 Q What is your plan moving forward with the dogs and 16 Alyson? 17 A I know she wants the dogs and I want the dogs, and 18 so that's -- and I don't want to split the dogs 19 up. I think they go with the -- oh, man. I don't 20 have the answer on this one, and I've definitely 21 lost a little sleep. You know, does one person 22 get one dog and the other one gets the other dog? 23 That doesn't make sense either. 24 Q What is your preference, that you keep the dogs or 25 that she keeps the dogs?</p>

<p style="text-align: right;">Page 193</p> <p>1 A I mean, I like the arrangement we have. It works 2 for me, but I know she doesn't want that. 3 Q Would you say your preference then is for you to 4 keep the dogs? 5 A No. We have 5 2 2 5 on the dogs. We thought it 6 was going to be with the kids too, so that would 7 be the ultimate for me where the dogs would go 8 with the visitation. 9 Q To be clear, the ultimate goal for you or what you 10 desire is for Camryn and the dogs to be split in 11 the same way? 12 A Exactly. And that was always what I thought Allie 13 wanted until I saw the offer. 14 Q Would you agree to share the dogs with Alyson? 15 A Of course. 16 Q On page 6 you list your debts. Do you know how 17 much the balances have changed since January? 18 A Yeah. I mean, I pulled some numbers just 19 yesterday or looked. Which page are debts? 20 Q Page 6 lists all your debts. 21 A All right. Sorry. I definitely think they have 22 gone down. I think they have gone down. Do you 23 know what I mean? Obviously we have been making 24 payments on them. 25 The Sleep Number for sure went down. My</p>	<p style="text-align: right;">Page 194</p> <p>1 mom's went down, I'm assuming. I don't know. 2 These are Allie's cards, some of these are Allie's 3 personal stuff. Yeah, I think they've all gone 4 down. I know like the Jet Blue one is down. I 5 think I saw \$900. 6 I mean, I could pull up -- I have an app 7 that could tell me all these. The Sapphire card, 8 you know, that fluctuates, but I told Allie 9 probably after this to start paying off everything 10 in full, you know what I mean, instead of trying 11 to -- she does this juggling act with the 12 creditcards to avoid interest, and I said, look, 13 let's just pay them off, and I think the only card 14 I saw recently was 19,000 on one of the 15 Bank of America cards, and that's the only thing I 16 saw as far as debt goes, but I don't have any 17 personal -- 18 MS. GLASSMAN: Let the record reflect 19 that counsel is pointing to her phone and the 20 deponent is -- 21 A My spreadsheet that I gave her. How much is on 22 there? 23 Q How much money is on your spreadsheet right now as 24 far as creditcards debt? 25 A Debt?</p>
<p style="text-align: right;">Page 195</p> <p>1 Q Debt. 2 A Yeah. 19,000, I think, is all. Let me look. 3 All right. All right. Yeah, the Bank of America 4 business is at 19,650. Oh, here's the other 5 thing. So here's the other one. So Allie updated 6 this for me. 7 Q Hold on a minute. Why did you include the 8 business debt in this section? 9 A Oh, I thought you were asking me -- I just pulled 10 up the spreadsheet that has all our debts, current 11 debts. Sorry. Ask your question again on the 12 spreadsheet. 13 Q Why did you include your business card under 14 unsecured debt section? 15 A It's not. There's no business on this. Sorry. 16 Q Do you see the -- 17 A Oh, Bank of America. Okay. I got it. I can't 18 tell you why. 19 Q Can you provide us with the total amount of 20 unsecured debt you have today without the 21 business? 22 A Yeah, I was going to ask that question. I can do 23 a little thing here. 24 Q Can you just give us the total number? 25 A Yeah, I'm doing it. I'm doing it right now. I'm</p>	<p style="text-align: right;">Page 196</p> <p>1 going to give it to you. 13,030.51. And that 2 doesn't include my mom's. 3 Q Does that include your business or no? 4 A No. That's just at least the stuff that Allie 5 gave me for our personal stuff. It does not 6 include bank stuff, so it has to do with -- yeah, 7 so this is the stuff Allie filled out last week, 8 so this is only personal, 13,000. 9 And then probably the bed, so hold on, the 10 bed. I don't have -- it looks like some stuff 11 missing, so on your spreadsheet that you guys gave 12 us I asked Allie if she could update it for me, 13 and she did which was great, but it looks like 14 some of the stuff isn't here. Maybe it is. I 15 can't remember. That Synchrony I think is the 16 bed. I think it does have everything in it, so 17 13,000 plus my mother. 18 Q Under the summary at the bottom you have your 19 shortfall as \$3,159.42 per month. Do you think 20 that number is now lower because your debt balance 21 is lower? 22 A Shortfall? And again, like I said, I did a 23 worksheet and they put it into this format, so 24 that's all I can tell you. Yeah, I would 25 definitely say that.</p>

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1 Q Throughout your marriage have you always been in
 2 the red, so to speak?
 3 A Red means debt, right?
 4 Q Red means debt.
 5 A Yeah, I think we've always had -- we've carried a
 6 great deal. I don't want to say a great deal of
 7 debt, but we definitely carried a lot of debt
 8 through our marriage, yeah, for sure. Do you know
 9 what I mean?
 10 Q Were you able to make monthly payments towards
 11 your creditcards?
 12 A Always. Never missed. You know, Allie is
 13 incredible at that.
 14 Q When you made the monthly payments you would use
 15 money that you earned from your business, correct?
 16 A Yeah. And again, like I said, Allie had her ways
 17 to do it, but I was always under the assumption
 18 that most of the stuff was paid by us by our
 19 personal numbers, you know, until I found some
 20 things that contradicted that, and that was
 21 recent.
 22 Q Turn to page 7.
 23 A Uh-huh.
 24 Q Are there any changes to the cash on hand section?
 25 A Yeah.

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1 out or I ever cash out that Allie will get half of
 2 that. Hopefully it will, and we'll all be rich.
 3 Q Would you be willing to hold the shares in trust
 4 for Novo in the event that they hold value for the
 5 benefit of Alyson?
 6 A What do you mean? I don't understand what that
 7 means.
 8 Q Are you willing to hold onto the shares in a trust
 9 for Alyson in the event that they hold value, a
 10 contract so that you would hold onto the shares
 11 and then split them at a later date equally with
 12 Alyson?
 13 A Yeah, I just said that. I mean, look, understand
 14 that she signed a document that said she had no
 15 rights to the stock, look, but I want to be fair.
 16 Q Do you agree to carry a life insurance policy for
 17 Alyson's benefit for any maintenance and child
 18 support obligation?
 19 A What's the law? I think somebody told me that it
 20 might be required. I don't know what the law is.
 21 Q Would you agree to do that?
 22 A I don't know what it costs. I don't know how all
 23 this stuff -- if it's an optional thing, you know
 24 what I mean?
 25 Q Would you agree to carry a life insurance policy

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1 Q What are the changes?
 2 A Everything is gone. The college fund has 6,000 in
 3 it, but everything else -- sorry. Let me just
 4 think about this one. So the Chase Private Client
 5 is zero. Acorn is probably a little higher. The
 6 college fund is down to I think under six. The
 7 Chase Private Client is gone, and the
 8 Bank of America, that's the business and is right
 9 now at 104.
 10 Q Why is the college fund down?
 11 A We paid last -- I don't know. It seems really
 12 high here, but there is definitely a whole
 13 semester that's gone, and I'm not sure why it was
 14 22,309 and now I know it's six. The Subaru I know
 15 is way down too, but like I said, that's my kid's
 16 car. My sister makes the payment. The only thing
 17 is my name is on it, but there's not much left on
 18 it.
 19 Q Go to page 8. Are there any changes on page 8?
 20 A The only thing that we talked about, the stock
 21 thing, is that I have -- what's it called? I have
 22 stock options or something with this company
 23 called Novo that we have 100,000 shares of.
 24 I don't know if it will become of anything,
 25 but I do have every intention if it does ever cash

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1 that would be in the event you die such that
 2 Camryn can still receive money as well as Alyson?
 3 A I have other things in place for my kids.
 4 Q What do you have in place for Camryn?
 5 A Well, I mean that our will states certain things,
 6 do you know what I mean, that my assets all go to
 7 my kids, and I kept Allie on it. I told Biff who
 8 did it, did our thing, that I wanted it adjusted,
 9 but I offered to keep Allie on it, my will. Do
 10 you know what I mean?
 11 Q I'm not talking about a will, but a policy.
 12 A I know what you're talking about. Like I said, I
 13 don't know the answer to the question because I
 14 don't know how much they are.
 15 If they're \$10,000 a month, I can't afford
 16 it. If they're 150 bucks a month? You know, is
 17 she going to carry one for me because, look, if
 18 she wasn't around raising one child would be a
 19 challenge, so I think it should be a mutual thing,
 20 and I'm willing to look at something like that.
 21 Q Do you agree in the divorce that Alyson will keep
 22 the Ford Flex?
 23 A Yeah, I guess, yeah. It had some hail damage too,
 24 so she's got a good deal with that payment, and I
 25 think that's great. I hope she can get a nice

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1 car.

2 **Q Do you agree that you will keep the Nissan Maxima?**

3 A I do.

4 **Q Do you agree that the value is about 35,000?**

5 A No, I do not.

6 **Q What is your opinion of the value?**

7 A Well, I know what it is. It's 30 and change. 30

8 and change, and that's according to Kelly Blue

9 Book.

10 **Q What condition did you put in as far as the --**

11 A Mint.

12 **Q If you could just wait until I finish the question**

13 **just for purposes of the record.**

14 **Do you agree to divide any joint checking**

15 **and saving accounts with Alyson?**

16 A Sure.

17 **Q Do you agree to split whatever is left in the**

18 **Acorn account with Alyson?**

19 A Yeah. I think that's a 50/50 asset, sure.

20 **Q Do you agree that each of you should keep debts**

21 **that are only in your own name?**

22 A No.

23 **Q Why not?**

24 A Well, she has access to all my creditcards. Just

25 yesterday she transferred \$7,000 onto one of my

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1 was just an alternating pick.

2 There's some stuff that she had before the

3 marriage. That's fine. I have no claim to that,

4 and there's one big piece, you know, that was

5 personal to me that I really love, and I don't

6 think she would contest to it, so I really don't

7 see it, but I do agree that maybe, you know, she

8 takes first pass and then whatever. And then as

9 far as furniture, you know, we have this fricking

10 \$10,000 bed that is a behemoth, and I think it

11 should stay with the house, to be honest with you.

12 **Q Is there any other personal property that you wish**

13 **to keep besides your own clothes and personal**

14 **products?**

15 A No, not really. I mean there's stuff at the house

16 like power-washers, lawnmowers. My tool chest,

17 that would probably be something I'd want to keep,

18 my tool stuff, but the stuff that -- like I said,

19 I think the smartest thing to do is let me walk

20 away from the house, and I originally asked her to

21 do this. Go and red-dot all the stuff you want,

22 but she hasn't wanted to do that.

23 **Q Who have been your attorneys in this case?**

24 A Too many.

25 **Q How many attorneys have you had?**

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1 cards.

2 **Q Do you agree that the debts should be split**

3 **equally?**

4 A Yes.

5 **Q Do you still continue to agree that you only wish**

6 **to keep the basics in the property division?**

7 A Keep the basics? What does that mean?

8 **Q Personal property. You stated before --**

9 A Yeah. I see no reason that that cannot be totally

10 admirable. The only contention is going to be the

11 artwork we have, and I think I'm going to be more

12 than reasonable with it, but I don't know how

13 she's going to be.

14 **Q What artwork do you wish to keep?**

15 A I'd have to look at it all and decide. I have

16 asked her to take first pass it at though. I am

17 not out -- well, see the weird part is that we

18 have these two big collections. We have four that

19 are a series. One has twenty different art pieces

20 and one has ten and another one has six.

21 They're not necessarily valuable as the

22 whole because you can buy them individually.

23 Those I would think we would just split in half,

24 and I would give her the extra one if there was an

25 extra one. That would make sense to me, and it

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1 A Three.

2 **Q What are their names?**

3 A I don't even remember the first one. It was

4 short-lived. We agreed that this case was too

5 complicated for them, so they bowed out. Then

6 Lyons Gaddis and it was Erin and John, and then

7 Kate.

8 **Q How much have you paid total in attorney fees?**

9 A Less than Allie.

10 **Q How much as far as the number?**

11 A I don't know totally, but I know when I did look

12 at it, it was less.

13 **Q What source --**

14 A Because Gaddis refunded me or tore up their final

15 15,000 or something and change bill.

16 **Q What source or sources have you used to pay for**

17 **your attorney fees?**

18 A We talked about that. The company pays for it.

19 **Q Do you put it on a company card?**

20 A Uh-huh. Yeah.

21 **Q Which card are you using to do that?**

22 A The Bank of America, the one that pays back

23 1.5 percent, I think, right now.

24 **Q Do you owe any money to any of these attorneys?**

25 A No. Well, after today I will.

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1 Q Aside from your lawyers, have you used any other
2 professionals for this case?
3 A No. I should have.
4 (Exhibit 9 marked.)
5 BY MS. MILFELD:
6 Q I am showing you what is marked as Exhibit 9.
7 A Oh, my god. When was this sent? What's your
8 question?
9 Q I am showing you an e-mail that is dated May 4th
10 at 11:58 AM.
11 A Uh-huh.
12 Q In the e-mail you say, and this is an e-mail to
13 Alyson, "Be prepared for this to last until August
14 or beyond unless you decide to undergo an
15 assessment to prove me wrong or if Jill disagrees
16 with the proof I'll provide and the many
17 therapists of our past and present that she will
18 talk to to support my claims."
19 A Yep. What's your question?
20 Q Do you plan on moving this case beyond August if
21 any of these things happen?
22 A Again, I want to answer this, you know, a hundred
23 percent honest with you guys. I told you that I
24 wish reunification started earlier because I felt
25 it would help my family in all disputes and

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1 happened then, you know, I would probably be more
2 inclined to say, hey, this is great, Allie, you
3 know, why don't you stay in the house for the next
4 six months or whatever. I would be more conducive
5 to that than having somebody combative.
6 Q Is reunification therapy being successful Alyson
7 being diagnosed with --
8 A I said --
9 Q Let me ask the question.
10 To you is the success of reunification,
11 does that mean Alyson is diagnosed with unresolved
12 childhood trauma or is it about you and Camryn
13 having a better relationship?
14 A Again, I have said this so many times.
15 Reunification is about identifying the issues that
16 has caused the separation between Camryn and I,
17 and it's then to establish the tools to bring us
18 back together.
19 I am saying that Allie with her permissive
20 parenting brought on so many other different
21 things is interfering with my ability to parent
22 and raise my child.
23 Reunification will identify that or they
24 won't, and they will make the necessary
25 adjustments utilizing the power that we've given

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1 resolutions.
2 So again we are underway and things are
3 going good. You know, in the next two or
4 three weeks hopefully there will be some new stuff
5 and we'll go from there.
6 But no, I would like to resolve this. I
7 don't want it to carry on much further, but I also
8 have to -- I have a lot of things on my plate
9 right at this moment. I have this incredible
10 contract that, you know, I have to be on
11 constantly, and I can tell you right now I got a
12 nasty e-mail today about not being available to
13 them and I worry, you know, when I can't be
14 reached. So I hope it doesn't. Kate doesn't want
15 it to go past August. I really don't necessarily
16 want it to go past August, but if you accept our
17 offer, then great, we're done.
18 Q I'm still trying to understand. You've said this
19 a few times.
20 A Yep.
21 Q How does the reunification therapy affect
22 settlement?
23 A Let's just say Jill feels that there is definitely
24 interference going on and thinks that Allie needs
25 treatment. Then at that point if that's what

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1 them to then resolve it or tell me I'm crazy, and
2 then at that point then I know what will happen,
3 and then it's just a matter of me just trying to
4 be a perfect father and parallel parenting with
5 Allie, but co-parenting will never happen, and
6 that's just my reality and that's my truth.
7 Q Is financial settlement contingent on
8 reunification success?
9 A Well, like I said, the success looks at different
10 things. No, I don't think it's necessarily
11 conducive to it. You know what I mean? So no.
12 I'm just saying that if Allie would undergo
13 an assessment and decided that they wanted to
14 address their treatment and finish their EMDR that
15 they started, then I'm going to be, you know, so
16 much more open to things.
17 Remember, if it was an alcoholic, if you
18 had an alcoholic, which we may have, and that's
19 another topic, but if you had an alcoholic and
20 you're the husband, and that alcoholic, you would
21 want help. Eventually you have to let go of them,
22 but at the same time I'm like -- I don't know how
23 I can make myself any clearer than what I have
24 stated, and I apologize if I'm not being very
25 clear.

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<p style="text-align: right;">Page 209</p> <p>1 Q Well, you're not clear, because the question is is 2 financial settlement dependent on the success of 3 reunification therapy, yes or no. 4 A Oh, fuck. Success of reunification? No. 5 Q Who is the alcoholic? 6 A Allie has suffered from -- Allie has had issues 7 with drinking for many years and was arrested for 8 it. 9 Q When was she arrested? 10 A I think it was like six years ago. 11 Q Why do you think Allie is an alcoholic? 12 A I said -- let me reframe this. I am not in any 13 position to tell you that Allie is an alcoholic. 14 I can tell you facts that Allie has struggled with 15 substance abuse. 16 Allie tried to quit several times. Allie 17 agreed to certain terms in therapy that she could 18 never adhere to. And I can tell you that she has 19 hidden alcohol from me. I can tell you that when 20 she fled she tried to quit drinking because she 21 was confronted by my sister and myself, and 22 therefore she gets belligerent as shit. 23 I feel there has been certain occasions 24 recently that has happened that I felt she was 25 drinking because I have been so in tune with her</p>	<p style="text-align: right;">Page 210</p> <p>1 personality changes, and then I went and found 2 these hidden creditcard charges, and there it was, 3 Niwot Liquor, and then I found another one for 4 Wyatt's and I found another one, and my older son 5 even who is an alcoholic identified that Allie did 6 have issues and he said and asked me kindly, dad, 7 let me take care of this. And I said okay. And I 8 am trying to let him take care of it. 9 Q How did Allie hide the charges? 10 A She used her personal creditcard like I told you 11 guys, and then she paid off the whole creditcard 12 with Tool's money, and it was only when I got a 13 creditcard statement did I even see that it was 14 Niwot Liquor, and then at that point I then went 15 back and saw how she was trying to classify that 16 creditcard payment, and that's what we brought up 17 to Peggy in mediation. That was the one thing 18 that was so confusing to me, so I don't know what 19 to tell you, whatever. And then there's also, 20 you know, cash withdraws. Do you know what I 21 mean? 22 Q Do you know that she is using the cash withdrawals 23 for alcohol? 24 A I don't. Again, all I can tell you is what I saw 25 with her personal creditcards, a couple hundred</p>
<p style="text-align: right;">Page 211</p> <p>1 bucks in alcohol. And I know her well enough. I 2 mean, look, she spends \$200 a month on cigarettes 3 and nicotine stuff. You know what I mean? 4 So if you understood anything about this 5 unresolved trauma and the fight/flight state, you 6 would see she's always hiding. She always has 7 this anxiety about her and she smokes, she chews 8 mints, she drinks to numb it. That's just trauma. 9 You know, she had to bring a friend to 10 mediation apparently, Marla. And at least what 11 Peggy described, and you can answer this, but she 12 was emotionally upset about certain things that 13 you had to do a lot of cleaning. 14 I don't know why Peggy said to me, Charlie, 15 I'm sorry, but she's in denial. I don't know why, 16 but then maybe I'm totally wrong, but that's what 17 she said, and I swear on my kid's everything. 18 That's what she said. I still don't know why 19 mediation ended. All I know is Peggy ended it. 20 MS. GOFF: Can we go off the record? 21 (Break taken.) 22 BY MS. MILFELD: 23 Q We were just off the record and talking about a 24 date for you, Charlie, to provide us with a 25 settlement offer.</p>	<p style="text-align: right;">Page 212</p> <p>1 Will you agree to provide us a settlement 2 offer by Wednesday, July 12th? 3 A I'm just thinking about all these deadlines I have 4 for this job thing. It's hard. By the 14th. I 5 agree I will have it to you if Katie can agree by 6 the 14th. 7 Q Do you understand that we cannot resolve this 8 case, Allie cannot resolve this case until you 9 provide us with an offer? 10 Do you understand that? 11 A Yeah, I totally understand that. 12 MS. GLASSMAN: Katie, can you do it by 13 the 14th? 14 MS. GOFF: Yeah, I can do it whenever. 15 It's not that much. 16 BY MS. MILFELD: 17 Q Is there anything else that we didn't talk about 18 that you would like to bring up? 19 A I'd like to ask Carol why that document got 20 changed. 21 Q Let me ask this. 22 A You asked me. 23 Q Okay. Besides a question to Carol, is there 24 anything else that you would like to say before we 25 end here?</p>

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1 A Yes. I am skeptical and I am always very guarded
2 because I don't trust you for reasons that I have
3 made very clear in this conversation, so it's very
4 difficult to -- you know, it is what it is. I
5 think what you tried to do was horrendous, so
6 that's it, and illegal for that matter, so anyway,
7 that's it.

8 Q I think we are done.
9 THE COURT REPORTER: Ms. Goff, would you
10 like to purchase the transcript?
11 MS. GOFF: No.
12 THE COURT REPORTER: Okay. Ms. Milfeld,
13 would you like to purchase the transcript?
14 MS. GLASSMAN: We will purchase the
15 transcript, and so I like single-sided, four on
16 a page, with an index in the back.
17 THE COURT REPORTER: Okay. Got it.
18 Thank you very much.

19 (Deposition concluded at 3:37 PM.)
20
21
22
23
24
25

1 I, CHARLES BELL, do hereby certify that
2 I have read the foregoing transcript and that
3 the same and accompanying amendment sheets, if
4 any, constitute a true and complete record of my
5 testimony.
6
7
8

9 _____
10 Signature of Deponent
11 () No amendments
12 () Amendments attached

13 Acknowledged before me this _____ day of
14 _____ 2023.

15 Notary Public: _____
16 My Commission Expires _____
17 Seal: _____
18
19
20
21
22
23
24
25

1 STATE OF COLORADO)
2) ss. REPORTER'S CERTIFICATE
3 COUNTY OF DENVER)
4 I, Annie Sager, certify that I am a
5 Court Reporter and Notary Public within the
6 State of Colorado; that previous to the
7 commencement of the examination, the deponent
8 was duly sworn to testify to the truth.
9 I further certify that this deposition
10 was taken in shorthand by me at the time and
11 place herein set forth and was thereafter
12 reduced to typewritten form, and that the
13 foregoing constitutes a true and correct
14 transcript.
15 I further certify that I am not related
16 to, employed by, nor of counsel for any of the
17 parties or attorneys herein, nor otherwise
18 interested in the result of the within action.
19 In witness whereof, I have affixed my
20 signature this 17th day of July, 2023.
21 My commission expires June 25, 2027.
22
23
24
25

1 AB LITIGATION SERVICES
2 216 Sixteenth Street, Suite 600
3 Denver, Colorado 80202
4 July 17, 2023
5 Kathryn Goff, Esquire
6 Via Email: katie@goff-law.com
7 Re: Deposition of Charles Bell
8 Bell v. Bell
9 Case No. 2022DR30458
10 The aforementioned deposition is ready for reading and
11 signing. Please attend to this matter by following BOTH of
12 the items indicated below:
13 ___XXX_ Call 303-296-0017 and arrange with
14 us to read and sign the deposition in our
15 office
16 ___ Have the deponent read your copy and sign the
17 signature page and amendment sheets, if
18 applicable; the signature page is attached
19 Read the enclosed copy of the deposition and
20 sign the signature page and amendment sheets,
21 if applicable; the signature page is attached
22 ___XXX_ WITHIN 35 DAYS OF THE DATE OF THIS LETTER
23 By _____ due to a trial date of _____
24 Please be sure the original signature page and amendment
25 sheets, if any, are SIGNED BEFORE A NOTARY PUBLIC and
returned to AB Litigation Services for filing with the
original deposition. A copy of these changes should also be
forwarded to counsel of record. Thank you.
21 AB LITIGATION SERVICES
22 cc: All Counsel
23
24
25

ASager
Annie Sager
216 Sixteenth Street, Suite 600
Denver, Colorado 80202

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