

ORIGINAL

IN THE SUPREME COURT OF OHIO

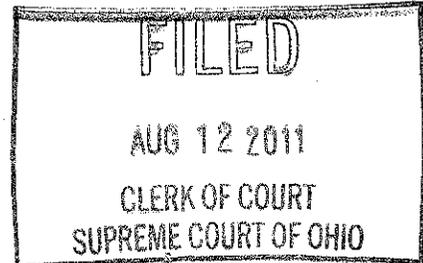
Disciplinary Counsel,
Petitioner

250 Civic Center Drive
Suite 325
Columbus, OH 43215

CASE NO. 2008-1573

Bruce Andrew Brown
(aka Amir Jamal Tauwab,
aka B. Andrew Brown),
Respondent

6075 Penfield Lane
Solon, OH 44139



PETITIONER'S STATUS MEMORANDUM REGARDING
RESPONDENT'S FAILURE TO PAY CIVIL PENALTY

JONATHAN E. COUGHLAN (0026424)
Disciplinary Counsel,
Petitioner

BRUCE ANDREW BROWN
(aka Amir Jamal Tauwab,
aka B. Andrew Brown)
Respondent, pro se

6075 Penfield Lane
Solon, OH 44139

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INTRODUCTION

On August 2, 2011, this Court ordered the parties to file memoranda informing the Court of the current status of this matter. Now comes petitioner, Disciplinary Counsel, and hereby submits a memorandum in response to the Court's order.

MEMORANDUM

On January 25, 2011, upon consideration of petitioner's Motion for Order to Appear and Show Cause, this Court found respondent, Bruce Andrew Brown (aka Amir Jamal Tauwab, aka B. Andrew Brown), in contempt of this Court's order that he pay a

\$50,000 civil penalty in this matter.¹ The contempt order required respondent to submit to a debtor's exam within 45 days of the date of that order.

Shortly after the January 25, 2011 order was issued, the Ohio Attorney General retained the Cleveland-based law firm known as Douglass & Associates Co., L.P.A. to conduct the debtor's examination and pursue collection efforts against respondent.² For execution purposes, the Douglass firm filed this Court's judgment against respondent in Cuyahoga County on February 11, 2011, i.e., Case No. 11 CVH 02868, Cleveland Municipal Court.

Respondent's debtor's examination was conducted by Attorney Sean Berney on February 22, 2011. The examination lasted approximately two hours and 15 minutes and was conducted pursuant to a subpoena duces tecum issued to respondent. A photocopy of the deposition transcript is attached hereto as Exhibit A. Although the duces tecum commanded that respondent bring several documents with him to the examination, respondent appeared without most of the requested records. Respondent indicated that he would request the records from his banks after the examination whereupon Mr. Berney asked respondent to provide proof that he had done so prior to March 5, 2011. Respondent was also asked to produce various tax returns.

¹ The \$50,000 civil penalty was levied by this Court against respondent on March 19, 2009. See *Disciplinary Counsel v. Brown*, 121 Ohio St.3d 423, 2009-Ohio-1152, 905 N.E.2d 163. To date, respondent has not paid any portion of the penalty.

² The information conveyed to this Court in this memorandum is not to be construed in any way as a full or partial waiver of the attorney-client privilege maintained with the Douglass & Associates law firm.

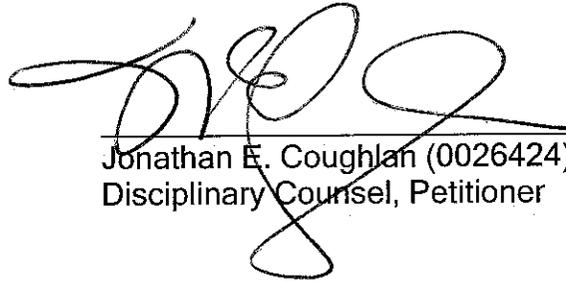
Respondent did not provide any of the requested records prior to March 5, 2011 nor did he provide proof that he had requested the records.³ Instead on April 8, 2011, respondent sent a letter to Mr. Berney indicating that he objected to producing the requested documents. As a result of respondent's failure to produce the records, on or about April 11, 2011, the Douglass firm issued subpoenas to PNC Bank and to Real Estate Mortgage Group. Respondent filed a Motion to Quash and a Motion for Protective Order in response to the subpoenas.

A hearing on respondent's motions was held on June 23, 2011. Attorney David Douglass appeared on behalf of the Court. At the hearing, respondent made offensive remarks directed at counsel for petitioner and advised Mr. Douglass that he would "never" voluntarily pay the \$50,000 judgment. The hearing on respondent's motions was continued and the motions have not been ruled on by the court.

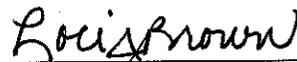
As of late June 2011, nothing had been collected from respondent toward satisfaction of the Court's \$50,000 civil penalty. It is apparent that respondent currently possesses no revenue or assets which can be attached to satisfy the Court's judgment. It appears likely that respondent's repeated claims of wealth, income and assets are nothing more than untruthful, grandiose statements. See, e.g. Appendix A.

³ On March 4, 2011, the Cleveland Municipal Court issued a \$50,000 judgment lien in favor of this Court against respondent, Case JL-11-442696. The Court's lien is one of several judgment liens pending against respondent in Cuyahoga County. An examination of the public records indicates that respondent is a party to many matters that remain in litigation.

Respectfully submitted,



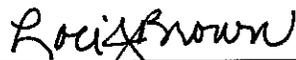
Jonathan E. Coughlan (0026424)
Disciplinary Counsel, Petitioner



Lori J. Brown (0040142)
Chief Assistant Disciplinary Counsel
Counsel of Record

Certificate of Service

I hereby certify that a copy of this memorandum was mailed via ordinary U.S. Mail to respondent, Bruce A. Brown, 6075 Penfield Lane, Solon, OH 44139 this 12th day of August, 2011.



Lori J. Brown (0040142)
Counsel for Petitioner

IN THE CLEVELAND MUNICIPAL COURT
STATE OF OHIO

DISCIPLINARY COUNSEL,)
)
Plaintiff,)
vs.) Case No. 11CVH02868
)
BRUCE A. BROWN)
(aka B. ANDREW BROWN,)
aka AMIR JAMAL TAUWAB),)
)
Defendant.)

- - - - -

THE DEPOSITION OF
BRUCE A. BROWN aka AMIR JAMAL TAUWAB
TUESDAY, FEBRUARY 22, 2011

- - - - -

The deposition of BRUCE A. BROWN aka AMIR JAMAL TAUWAB, called by the Plaintiff for examination pursuant to the Ohio Rules of Civil Procedure, taken before me, the undersigned, Elaine S. Newlin, Registered Professional Reporter and Notary Public within and for the State of Ohio, taken at the offices of Douglass & Associates Co., LPA, 4725 Grayton Road, Cleveland, Ohio, commencing at 9:29 a.m., the day and date above set forth.

APPENDIX
A

1 APPEARANCES:

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On behalf of the Plaintiff:

Sean F. Berney, Esq.
Douglass & Associates Co., LPA
4725 Grayton Road
Cleveland, Ohio 44135-2307
sberney@douglasslaw.com

BRUCE A. BROWN aka AMIR JAMAL TAUWAB
DEPOSITION INDEX

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1 BRUCE A. BROWN aka AMIR JAMAL TAUWAB,
2 of lawful age, called by the Plaintiff for
3 examination pursuant to the Ohio Rules of Civil
4 Procedure, having been first duly affirmed, as
5 hereinafter certified, was examined and
6 testified as follows:

7 MR. BERNEY: Let the
8 record reflect that we are here at the offices
9 of Douglass & Associates, LPA in Cleveland,
10 Ohio in a case entitled the Ohio Supreme Court
11 verse Bruce Andrew Brown. This relates to a
12 judgment originally entered by the Ohio Supreme
13 Court and transferred to Cleveland Municipal
14 Court which is now known as Case Number
15 11CVH02868.

16 Bruce Andrew Brown who is also known as
17 Amir Tauwab -- is that how you pronounce it,
18 sir?

19 THE WITNESS: My name is
20 Amir Jamal Tauwab.

21 MR. BERNEY: Amir Jamal
22 Tauwab was ordered to undergo a debtor's exam
23 or long aid examination by the Ohio Supreme
24 Court and was also served with an order from
25 the Cleveland Municipal Court to appear on

1 Q Okay. The other thing, the court reporter is
2 here. She is going to take down your answers
3 and responses to the questions that I give. I
4 would ask that you make your answers and
5 responses verbal. Okay?

6 A Sure.

7 Q Yes, no. Try to avoid uh-huh, uh-uh, things
8 like that, because while we may know what they
9 mean today in the context of sitting here, when
10 someone goes back and looks at this transcript
11 later, it may not be as clear.

12 A Sure.

13 Q The other thing I'll ask you is, when I'm
14 talking, let me talk, and when you're talking,
15 I'll let you talk. Okay?

16 A Sure.

17 Q All right. Mr. Tauwab, can you tell me what
18 your current address is?

19 A 6075 Penfield Lane, Solon, Ohio, 44139.

20 Q Do you actually reside in that property?

21 A I do not actually reside there at this time,
22 no.

23 Q Where do you reside, sir?

24 A I reside with friends and at another location
25 from time to time.

1 March 5th, 2011 at 2:30 p.m. at the Court.

2 In order to allow for a more private
3 exchange, Mr. Brown was afforded the
4 opportunity to appear at our offices here
5 today, and provided that he cooperate fully and
6 completely during the course of the exam, the
7 hearing on March 5th, 2011 may be continued or
8 withdrawn.

9 EXAMINATION OF BRUCE A. BROWN aka AMIR JAMAL TAUWAB
10 BY MR. BERNEY:

11 Q Could you state your full name and spell your
12 name for the court reporter, sir?

13 A Amir Jamal Tauwab, A-m-i-r J-a-m-a-l
14 T-a-u-w-a-b.

15 Q And, Mr. Tauwab, I believe you have had your
16 deposition taken before. Is that correct?

17 A I have.

18 Q So I just want to refresh your memory of a
19 couple of things. I'm going to be asking you
20 some questions. I'm going to assume that if
21 you answer a question, that you understand it.
22 If for some reason you do not understand a
23 question, I'd be happy to rephrase it so that
24 you do understand it. Okay?

25 A Sure.

1 Q Where do you reside?

2 A When?

3 Q Where did you reside last night?

4 A 27500 Bishop Park Drive with -- at a friend's
5 house.

6 Q And what's the name of the friend?

7 A Donna Blankenship.

8 Q And where is 27500 Bishop Park Drive? What
9 city is that in?

10 A I think it's Euclid.

11 Q And how long have you resided there, sir?

12 A Well, I don't actually reside there. I
13 actually do not have a residence because I was
14 being evicted and I'm basically staying at
15 friends'.

16 Q Well, how long have you stayed there?

17 A I stayed there last night.

18 Q How about the night before that, where did you
19 stay?

20 A I stayed at 36293 Derby Downs Drive.

21 Q And who did you stay there with?

22 A I was staying there, but I'm being evicted from
23 there.

24 Q You're being evicted from there. Where is that
25 located?

- 1 A Solon.
 2 Q Who is your landlord there?
 3 A Gale Gasparovich.
 4 Q Do you know how to spell that, sir?
 5 A Not offhand. G-a-s-p-a-r-o-v-i-c-h I believe.
 6 Q How long had you resided there?
 7 A I initially went there in October and I was
 8 unable to --
 9 Q This would be October of 2010?
 10 A Yes.
 11 Q Okay.
 12 A But I was unable to really pay, and I've really
 13 been staying at different places with friends
 14 because they have been kind enough to allow me
 15 to stay there, but they said, you know, you
 16 gotta go because I couldn't -- I only made one
 17 month's payment. I couldn't afford to make any
 18 others, so I couldn't stay with friends.
 19 Q So let me understand. In October of 2010, you
 20 went to 36293 Derby Downs Drive?
 21 A Right.
 22 Q Did you have a lease or did you have some
 23 agreement that you were going to stay there?
 24 A Yes.
 25 Q Could you tell me what that agreement was?

- 1 A For 2500 bucks a month.
 2 Q And so there came a point in time when you were
 3 supposed to pay that. Did you put a deposit
 4 down or a security deposit or anything like
 5 that?
 6 A No. I couldn't afford to.
 7 Q So you said that you're being evicted from
 8 there. When you say you're being evicted, can
 9 you describe for me what's happened?
 10 A Well, they basically said "You gotta go" and --
 11 Q They told you verbally that you had to leave?
 12 A Verbally and through an e-mail.
 13 Q And when was that, sir?
 14 A It's been a while. I can't remember exactly
 15 when.
 16 Q Was it this year?
 17 A This year and last year.
 18 Q So how long did you continue to stay at the
 19 address at 36293 Derby Downs Drive? When is
 20 the last time you stayed there?
 21 A Saturday -- Sunday.
 22 Q Have they served you with a written notice to
 23 vacate the premises?
 24 A No.
 25 Q Does anyone else reside there with you?

- 1 A No.
 2 Q And you haven't paid any rent at all; is that
 3 correct?
 4 A One time.
 5 Q Where did you pay the rent to?
 6 A Gale.
 7 Q You gave it to her directly?
 8 A No. I believe I mailed it to her.
 9 Q Do you know where you mailed it to?
 10 A Not offhand, no. I mean I don't have the -- I
 11 don't have the address with me, no.
 12 Q How did you pay her? Check? Cash? Money
 13 order?
 14 A It wasn't cash. I don't know if it was a money
 15 order or check. I don't remember. It was not
 16 cash.
 17 Q And when did you pay her?
 18 A November.
 19 Q I'm sorry. I probably am going to mispronounce
 20 your name a bunch of times. It's not
 21 intentional.
 22 A Just call me Amir.
 23 Q Amir. Okay. Amir, can you tell me if you are
 24 known by any other names or have been known by
 25 any other names?

- 1 A My birth name is Bruce Andrew Brown.
 2 Q Did you legally have your name changed?
 3 A Yes.
 4 Q When did you do that, sir?
 5 A It's been years.
 6 Q More than ten years?
 7 A Oh, yeah.
 8 MR. BERNEY: Let me go off
 9 the record for just a second.
 10 (Discussion held off the record.)
 11 -----
 12 (Deposition Exhibit No. 1 was marked.)
 13 -----
 14 Q I'm going to hand you what we already marked as
 15 Deposition Exhibit 1. Do you recognize that
 16 document?
 17 A No.
 18 Q You don't recognize that?
 19 A No.
 20 Q Did you receive a copy of that via facsimile
 21 from my office?
 22 A I received a facsimile from your office.
 23 Q Yes. And you received a copy of that with the
 24 facsimile; did you not?
 25 A I don't know.

- 1 Q Could you look at page 2 of that document? Do
2 you see page 2?
3 A Yes.
4 Q Did you bring any of those documents with you
5 today?
6 A I brought all that I have. I'll go down the
7 line.
8 Q Okay. Well, I'm just asking you. You brought
9 some documents with you today?
10 A I brought -- yes.
11 Q So we'll get to that.
12 A Okay.
13 Q And you knew to bring those documents because
14 you had seen this, correct?
15 A I've seen these pages, yes.
16 Q Now, if I represent to you that they were both
17 faxed together --
18 A I have no reason -- I mean I got a very
19 voluminous fax from you.
20 Q You have no reason to disagree with me that you
21 got both pages?
22 A I just looked for the duces tecum, because
23 pursuant to our telephone conversation, you
24 told me there was a duces tecum to be
25 attached --

- 1 Q Okay. Fair enough.
2 A -- and I needed to see what I was gonna bring.
3 Q Fair enough.
4 -----
5 (Deposition Exhibit No. 2 was marked.)
6 -----
7 Q I'm going to also hand you what's been marked
8 as Plaintiff's Deposition Exhibit 2. Have you
9 seen that document before?
10 A Yes.
11 Q So you're aware that you're under order of the
12 Ohio Supreme Court --
13 A Yes.
14 Q -- to appear and give testimony --
15 A Yes.
16 Q -- a long aid examination which is also called
17 a debtor's examination?
18 A Yes. Excuse me.
19 Q Do you have a valid driver's license?
20 A Yes.
21 Q Do you have that with you today?
22 A No.
23 Q When did you last renew your driver's license?
24 Do you know?
25 A June 7th of 2010.

- 1 Q What address is reflected on your driver's
2 license?
3 A 31810 Bainbridge Road.
4 Q Is that where you resided on June 7, 2010?
5 A No.
6 Q Well, where did you reside on June 7, 2010?
7 A 6075 Penfield Lane.
8 Q Well, did you actually live on Penfield Lane at
9 the time?
10 A Yes, I did.
11 Q What's your current marital status?
12 A I'm not married.
13 Q Have you ever been married before?
14 A Yes.
15 Q How many times?
16 A Four. Twice to the same person. Three
17 different people.
18 Q Could you tell me the dates of those marriages?
19 A 2007. I don't know the day.
20 Q How about the year?
21 A 2007 I believe. No. Hold on. 2005 I believe.
22 Q Well, let's start with the first one. You've
23 been married four times, right, so we have
24 three women here, right?
25 A Yes.

- 1 Q Let's talk about the first woman. What was her
2 name?
3 A Dana Davis.
4 Q And when were you married to Dana Davis?
5 A Late '80s.
6 Q And where did that marriage take place?
7 A Mt. Vernon, New York.
8 Q Did you receive a divorce, annulment?
9 A Yes.
10 Q Where did that occur? Also in New York?
11 A Yeah, New York. No, no, no. Connecticut.
12 Q And then you were married subsequent to that?
13 A Karen Leeth.
14 Q And do you know how to spell that?
15 A It's K-a-r-e-n L-e-e-t-h.
16 Q And when were you married to Karen Leeth?
17 A '91 I believe.
18 Q And how long were you married to her?
19 A My son was born in '94. '95. I don't -- I
20 don't -- I don't know. I don't know.
21 Q So about four years? Is that your
22 recollection?
23 A I don't know.
24 Q Did you ultimately become divorced from Karen
25 Leeth?

- 1 A Yes.
 2 Q Where did that divorce occur? What state?
 3 A Ohio.
 4 Q What county? Do you know?
 5 A I was incarcerated. I don't remember.
 6 Q And then after Karen Leeth, you were married to
 7 a third woman?
 8 A Suzanne Charlton.
 9 Q And you were married to her twice; is that
 10 right?
 11 A Right.
 12 Q When were you married to Suzanne Charlton?
 13 A Late '90s.
 14 Q And you became divorced from her at some point?
 15 A Yeah. And then 2005.
 16 Q So you remarried her in 2005?
 17 A Right.
 18 Q So sometime between the late '90s and 2005, you
 19 were divorced?
 20 A Yes.
 21 Q And where did you reside when you were married
 22 to Suzanne Charlton?
 23 A When?
 24 Q In the late '90s.
 25 A Shaker Heights.

- 1 Q So that would be Cuyahoga County, Ohio?
 2 A Yes.
 3 Q And where did you reside when you were married
 4 to Suzanne Charlton in 2005?
 5 A Solon.
 6 Q And that's also Cuyahoga County, Ohio, correct?
 7 A Right.
 8 Q When did you become divorced the second time
 9 from Suzanne Charlton?
 10 A April of 2009.
 11 Q Did you have any children as a result of these
 12 marriages?
 13 A With Karen I did.
 14 Q How many children did you have, sir?
 15 A One.
 16 Q And how old is that child?
 17 A 17.
 18 Q And where does he reside?
 19 A Maple Heights.
 20 Q And who does he reside with?
 21 A Karen Leeth.
 22 Q Do you pay child support for him?
 23 A When I'm able.
 24 Q Do you have any bank accounts, Amir?
 25 A I have a bank account at Chase.

- 1 Q And what type of account is it?
 2 A Like a Fresh Start account.
 3 Q What does that mean, a Fresh Start account?
 4 A When you've had bad credit and bad banking
 5 relations, they allow you to open an account.
 6 It's a checking account, but there are no
 7 checks attached to it.
 8 Q And how much money is in that account?
 9 A \$10.
 10 Q Do you have any other bank accounts?
 11 A No.
 12 Q When was the last time you had a bank account
 13 before Chase Bank?
 14 A December, January.
 15 Q Of 2010?
 16 A Yes.
 17 Q And where was that at?
 18 A Huntington.
 19 Q What type of account did you have at
 20 Huntington?
 21 A Checking account.
 22 Q What happened to that checking account?
 23 A It was closed because it was overdrawn.
 24 Q It would be fair to say that the bank closed
 25 that account, or did you close the account?

- 1 A The bank closed it.
 2 Q The bank closed it. Okay.
 3 Are you currently employed, Amir?
 4 A Yes.
 5 Q Where were you employed?
 6 A I'm self-employed.
 7 Q Where are you self-employed at?
 8 A B. Andrew Brown & Associates.
 9 Q B. Andrew Brown & Associates is a limited
 10 liability company; is that correct?
 11 A Yes.
 12 Q Where are their offices located?
 13 A 600 Superior.
 14 Q Is there a suite?
 15 A 1300.
 16 Q And which building is that actually in?
 17 A Fifth Third Center.
 18 Q What do you do there?
 19 A I don't understand your question.
 20 Q Well, you said you're self-employed. What do
 21 you do?
 22 A I work.
 23 Q Okay. What type of work do you do?
 24 A Consulting.
 25 Q What type of consulting?

- 1 A Depends on the client's needs.
 2 Q What type of consulting have you provided to
 3 your clients in the last year?
 4 A Business management.
 5 Q Can you describe for me what you mean when you
 6 say business management?
 7 A How to operate a business more efficiently I
 8 guess is the easiest way to put it.
 9 Q Does Bruce Andrew Brown & Associates, LLC have
 10 any employees besides you?
 11 A What is Bruce Andrew Brown & Associates, LLC?
 12 Q It's a limited liability company, correct?
 13 A I know nothing about it.
 14 Q You don't know anything about Bruce Andrew
 15 Brown & Associates, LLC?
 16 A No.
 17 Q How about Bruce Andrew Brown, LLC? Is that
 18 what the name of the LLC is?
 19 A Which LLC are you referring to?
 20 Q Well, let's go through them. What interest do
 21 you have in LLCs in Ohio? Any?
 22 A I don't remember offhand.
 23 Q You don't remember?
 24 A Other than B. Andrew Brown & Associates where I
 25 work.

- 1 Q Okay. B. Andrew Brown & Associates. Does
 2 B. Andrew Brown & Associates have any
 3 employees?
 4 A No.
 5 Q So you're the sole employee?
 6 A Yes.
 7 Q Okay. Does B. Andrew Brown -- I'm going to
 8 call it B. Andrew Brown going forward. Okay?
 9 A Sure.
 10 Q Fair enough. So you know what I'm referring to
 11 when I say that?
 12 A Sure.
 13 Q Does B. Andrew Brown pay rent?
 14 A Yes.
 15 Q Who does it pay rent to?
 16 A I don't know the name of the company offhand.
 17 It's in Texas.
 18 Q And what is the rent that B. Andrew Brown pays
 19 at the Fifth Third Center?
 20 A The base is 1250 I believe.
 21 Q \$1,250?
 22 A Yes.
 23 Q A month?
 24 A Yes.
 25 Q Is there additional added on besides the base?

- 1 A Yes.
 2 Q What's the additional?
 3 A Well, it depends on how much you use the office
 4 and what all you use. It's like an office
 5 sharing type place.
 6 Q Does B. Andrew Brown share space with some
 7 other entity or some other person?
 8 A There's 100 companies up there.
 9 Q All in your office?
 10 A Yeah.
 11 Q In your suite?
 12 A Yeah. I mean I don't know if it's 100, but
 13 it's several.
 14 Q Are you the sole member of B. Andrew Brown?
 15 A Yes.
 16 Q So you make all the decisions for him, correct?
 17 A Yes.
 18 Q Does B. Andrew Brown have a tax identification
 19 number?
 20 A It does.
 21 Q Do you know what that tax identification number
 22 is?
 23 A Not offhand, no.
 24 Q Does B. Andrew Brown have any bank accounts?
 25 A Yes.

- 1 Q And where are those accounts located?
 2 A Huntington.
 3 Q And how many accounts does it have at
 4 Huntington?
 5 A One.
 6 Q And what type of account is that?
 7 A Checking.
 8 Q And who has the ability to sign checks on that
 9 account?
 10 A Me.
 11 Q Anyone else?
 12 A No.
 13 Q Do you pay yourself a salary from B. Andrew
 14 Brown?
 15 A No.
 16 Q When did B. Andrew Brown come into existence?
 17 A Where?
 18 Q In Ohio.
 19 A I believe 2000, 2001. I don't remember.
 20 Q Is B. Andrew Brown the same as Bruce Andrew
 21 Brown Group Limited?
 22 A No.
 23 Q They're not the same entity?
 24 A No.
 25 Q Is B. Andrew Brown registered to do business in

1 the state of Ohio?
 2 A Yes.
 3 Q Who is the statutory agent for B. Andrew Brown?
 4 A I don't remember.
 5 Q Does B. Andrew Brown have an accountant?
 6 A It has used accountants.
 7 Q It has used accountants?
 8 A Yes.
 9 Q What accountants has it used since 2005?
 10 A Since 2005?
 11 Q If it would help you, let's start with now.
 12 Does it use an accountant currently?
 13 A Not yet. We will during tax time, but I
 14 haven't selected who that will be yet.
 15 Q Did B. Andrew Brown file taxes for the year
 16 2009?
 17 A No. I -- the company didn't -- I was
 18 incarcerated in 2009.
 19 Q Well, let's talk about that a little bit. From
 20 2005 till now, can you tell me the dates that
 21 you were incarcerated?
 22 A I don't remember the dates. I was incarcerated
 23 in 2005. I don't remember when I got out.
 24 Q Have you been incarcerated in 2000 -- were you
 25 incarcerated in 2008?

1 A No.
 2 Q Were you incarcerated in 2009?
 3 A Yes.
 4 Q What portion of 2009?
 5 A All of it except for a couple days.
 6 Q When did you get out of incarceration in 2009?
 7 A I didn't get out in 2009.
 8 Q Well, you said you were incarcerated all of
 9 2009 except for a couple days?
 10 A Correct.
 11 Q So you went in after a couple days?
 12 A Correct.
 13 Q Were you incarcerated in 2010?
 14 A Yes.
 15 Q How long were you incarcerated in 2010?
 16 A Until June 6th.
 17 Q So you were out of jail June 6th of 2010?
 18 A Yes.
 19 Q Have you been incarcerated since that day?
 20 A No.
 21 Q Are you currently on probation?
 22 A Yes.
 23 Q Who is your probation officer?
 24 A I have inactive probation.
 25 Q Inactive probation. Who are you on probation

1 with?
 2 A Garfield Heights.
 3 Q And what are you on probation for?
 4 A Disorderly conduct.
 5 Q When did that occur?
 6 A I believe I pled -- I don't remember. It was
 7 sometime in 2009 that I pled.
 8 Q Did B. Andrew Brown file taxes in 2008?
 9 A No.
 10 Q Did it exist in 2008?
 11 A Yes.
 12 Q So why did it not file taxes in 2008?
 13 A I'm trying to get my records in order to do so.
 14 Q Who has control of the record books of B. Andrew
 15 Brown?
 16 A At this point, I don't know. My ex-wife I
 17 think.
 18 Q Did B. Andrew Brown file taxes in 2007?
 19 A Yes.
 20 Q Who was the accountant that helped you file
 21 taxes in 2007?
 22 A I don't remember who or if I used one.
 23 Q What was the gross profit for B. Andrew Brown
 24 in 2007?
 25 A 2007, I don't remember the exact figure, but it

1 was a loss.
 2 Q The gross profit was a loss?
 3 A I mean the gross profit, I don't remember the
 4 gross profit.
 5 Q You have no idea what the gross revenues were?
 6 A No.
 7 Q How about 2008?
 8 A I have no idea.
 9 Q How about 2010?
 10 A I will have to look at the bank statements
 11 'cause I don't know offhand.
 12 Q Where did B. Andrew Brown have bank accounts in
 13 2007? Were you still at Huntington?
 14 A No. National City.
 15 Q How about in 2008?
 16 A National City and Dollar.
 17 Q So at some point in 2008, you switched to
 18 Dollar Bank, B. Andrew Brown did?
 19 A I don't remember if it was 2007 or 2008, but
 20 sometime around there.
 21 Q Did they have more than one account or was it
 22 just a checking account?
 23 A Just a checking.
 24 Q And as you sit here today, where does B. Andrew
 25 Brown have accounts?

- 1 A Huntington.
 2 Q How much is in that account currently? Do you
 3 know?
 4 A \$2.
 5 Q Does B. Andrew Brown utilize computers in its
 6 business?
 7 A Yes.
 8 Q Do the computers contain lists of B. Andrew
 9 Brown's clients?
 10 A No.
 11 Q Do you have a list of B. Andrew Brown's
 12 clients?
 13 A No.
 14 Q Does B. Andrew Brown have a list of its
 15 clients?
 16 A Currently B. Andrew Brown doesn't have clients,
 17 any -- any -- only a few clients right now.
 18 Q Well, who are the clients that B. Andrew Brown
 19 has?
 20 A I don't remember offhand.
 21 Q Is there anything that you could look at that
 22 would tell you who the clients of B. Andrew
 23 Brown are right now?
 24 A I can look at some files.
 25 Q And where are those files located?

- 1 A In the office.
 2 Q In the office at the Fifth Third Center?
 3 A Yes.
 4 Q Does B. Andrew Brown have an attorney?
 5 A Yes.
 6 Q Who is its attorney?
 7 A Jason Rawls.
 8 Q And where is Mr. Rawls located at?
 9 A Cleveland.
 10 Q How much does B. Andrew Brown pay Mr. Rawls on
 11 a monthly basis?
 12 A Nothing.
 13 Q He works for free?
 14 A He hasn't been paid.
 15 Q How much has Mr. Rawls billed B. Andrew Brown?
 16 A I haven't received a bill yet. B. Andrew Brown
 17 hasn't received a bill yet.
 18 Q Does he represent you as well, sir?
 19 A No, he doesn't represent me.
 20 Q Would you agree with me that I contacted B. Andrew
 21 Brown on the phone last week to try to speak
 22 with you? Do you recall that?
 23 A I think I called you.
 24 Q No. I called you, sir.
 25 If I call B. Andrew Brown, who answers

- 1 the phone?
 2 A The receptionist.
 3 Q Who is the receptionist?
 4 A Tracy.
 5 Q Is she an employee of B. Andrew Brown?
 6 A No.
 7 Q Who is she an employee of?
 8 A The landlord.
 9 Q Does B. Andrew Brown pay for her to answer the
 10 phone for it?
 11 A That's part of our base.
 12 Q That's part of your rent?
 13 A Yes.
 14 Q Did B. Andrew Brown pay its rent for
 15 February 2011?
 16 A No.
 17 Q How about January 2011?
 18 A A portion of it.
 19 Q Okay. How much?
 20 A I don't remember offhand.
 21 Q Did it pay its rent for December 2010?
 22 A Yes.
 23 Q So it hasn't paid its rent for February 2011
 24 and it's only paid a portion of its rent for
 25 January 2011; is that right?

- 1 A Yes.
 2 Q Is it being evicted?
 3 A No, not yet.
 4 Q Do you know how much B. Andrew Brown owes in
 5 rent at this point?
 6 A Not offhand, no.
 7 Q When B. Andrew Brown pays for its rent, how
 8 does it do so?
 9 A Either by mailing a check or calling and having
 10 it debited from the checking account.
 11 Q And this is for the landlord in the Fifth Third
 12 Building?
 13 A Right.
 14 Q Does B. Andrew Brown own any real estate?
 15 A Yes.
 16 Q What real estate does it own?
 17 A 6075 Penfield Lane.
 18 Q And when did it acquire that?
 19 A February 2008.
 20 Q Did you own that property prior to B. Andrew
 21 Brown owning it?
 22 A Yes.
 23 Q So you transferred that property to B. Andrew
 24 Brown?
 25 A Yes.

- 1 Q How much did B. Andrew Brown pay you in order
2 to transfer that property?
3 A I don't remember offhand.
4 Q Be fair to say they didn't pay anything?
5 A I don't remember offhand.
6 Q Did you represent to Cuyahoga County that it
7 didn't pay you anything?
8 A Did I represent to Cuyahoga County?
9 Q When you transferred the property from yourself
10 to B. Andrew Brown, did you represent to
11 Cuyahoga County that you did not pay any
12 consideration for the transfer?
13 A I don't remember offhand.
14 Q If the records of Cuyahoga County reflect that
15 you didn't pay any consideration, would you
16 disagree with that?
17 A I would have to look at the records.
18 Q How did you acquire that property before you
19 transferred it?
20 A I purchased it.
21 Q Do you need to make a call, sir?
22 A No.
23 Q Well, I'm going to ask you to put your phone
24 away.
25 A I can do more than one thing at a time.

- 1 Q Well, actually, no. I'd ask you to put your
2 phone away. You wouldn't be able to use your
3 phone in court if we were there, so you're not
4 going to use your phone here.
5 A We're not in court.
6 Q I know. We're here as a courtesy. If you'd
7 like, we can continue this at the court where
8 you won't use your phone and you'll give me
9 your attention. It will go much smoother and
10 much more quickly.
11 A I've been respectful to you and I ask that you
12 be respectful to me.
13 Q I am being respectful to you, sir. If you need
14 to make a call -- if you need to make a call --
15 A So be respectful to me, but don't talk to me
16 like I'm your child.
17 Q If you need to make a call, I'll be happy to
18 give you a couple minutes to do that. If not,
19 let's try to get through this. Fair enough?
20 How did you acquire that property on
21 Penfield?
22 A I had a mortgage.
23 Q You had a mortgage. Where did you get the
24 mortgage from?
25 A Real Estate Mortgage Corporation.

- 1 Q How much did you pay for that property?
2 A I don't remember.
3 Q How much was the mortgage for?
4 A I don't remember.
5 Q Did you fill out a residential loan
6 application?
7 A I don't remember.
8 Q You obtained a mortgage for the property and
9 you don't remember whether or not you filled
10 out a loan application?
11 A I don't remember what I did. That was four
12 years ago, 2007 sometime.
13 Q It was actually 2008, wasn't it?
14 A I don't think -- it may have been 2008.
15 Q Yes. Who did you get the mortgage with?
16 A Real Estate Mortgage Corporation.
17 Q On the mortgage, did you indicate that you had
18 an ownership interest in 4403 St. Clair Avenue,
19 Cleveland, Ohio, 44103?
20 A I don't know.
21 Q You don't know. Okay. We'll come to that in a
22 minute.
23 Do you or have you had an ownership
24 interest in the property at 4403 St. Clair
25 Avenue since October 15th of 2005?

- 1 A No.
2 Q So you never owned that property at 4403 St. Clair?
3 A I never owned that property, no.
4 Q So if on a mortgage application that you
5 submitted for Penfield you indicated that, that
6 would be incorrect; is that a true statement?
7 A I don't think I did that.
8 Q Well, I can show you the mortgage application
9 and I will. Okay?
10 A Okay.
11 Q But I'm asking you, if on the mortgage
12 application it indicates that you owned the
13 property at 4403 St. Clair Avenue, Cleveland,
14 Ohio, 44103, that's not true, correct?
15 A I would have to see the mortgage application.
16 Q Well, I want you to assume for a second that --
17 A I'm not going to make any assumptions.
18 Q It would be fair to say that you've never owned
19 the property at 4403 St. Clair Avenue,
20 Cleveland, Ohio, 44103; is that right?
21 A That's correct.
22 Q B. Andrew Brown has never owned that property
23 either, have they?
24 A No.
25 Q Has anyone or any other entity that you have

1 been affiliated with owned that property at
 2 4403 St. Clair Avenue?
 3 A No.
 4 Q The offices of B. Andrew Brown, are there
 5 computers there?
 6 A No.
 7 Q No computers? Do you utilize a computer in
 8 your business?
 9 A Yes.
 10 Q And where is that computer located?
 11 A Currently it's at the Derby Downs address.
 12 Q What type of computer is it, sir?
 13 A A laptop.
 14 Q Is that the sole computer utilized by B. Andrew
 15 Brown?
 16 A I've used computers other places.
 17 Q Is that the sole computer used by B. Andrew
 18 Brown in 2011 with its business?
 19 A No.
 20 Q What other computers does B. Andrew Brown
 21 utilize?
 22 A I've used one at Kinko's.
 23 Q Who paid for the computer that B. Andrew Brown
 24 utilizes?
 25 A I don't even remember.

1 A Yes.
 2 Q Any revenue that comes in to B. Andrew Brown,
 3 is it deposited in the bank account at
 4 Huntington?
 5 A Yes.
 6 Q So if the bank account for January of 2011
 7 shows credits, deposits of \$740.30, that's the
 8 total revenue that was received by B. Andrew
 9 Brown?
 10 A Yes.
 11 Q The revenue in December of 2010 reflected on
 12 the bank statement that you handed to me
 13 earlier was \$1,960 in deposits for
 14 December 2010. Is that the revenue for
 15 B. Andrew Brown in December 2010?
 16 A That's the gross revenue.
 17 Q How much did you pay yourself from B. Andrew
 18 Brown during 2010?
 19 A I don't know offhand.
 20 Q Do you have an idea?
 21 A No.
 22 Q How much did you pay yourself in December of
 23 2010?
 24 A I don't know offhand.
 25 Q So your testimony is you don't know what your

1 Q Do you personally utilize that computer as
 2 well?
 3 A Yes.
 4 Q Do you recall representing to anyone that the
 5 gross revenue of B. Andrew Brown in 2008 was
 6 \$350,000?
 7 A I remember telling Robert Warner that, yes.
 8 Q And is that true?
 9 A No.
 10 Q So the revenue was not \$350,000 in 2008?
 11 A No.
 12 Q How much was it?
 13 A I don't know.
 14 Q Was it less than \$100,000?
 15 A No. It was more than 100. How much more, I
 16 don't know.
 17 Q Was it more than \$200,000?
 18 A I don't know offhand.
 19 Q How about the revenue for B. Andrew Brown right
 20 now in 2011? How much revenue has come in in
 21 January?
 22 A I'd have to look at the bank statement.
 23 Q Do you have any idea?
 24 A I don't know offhand.
 25 Q Is this the bank statement you brought here?

1 income is per month?
 2 A At this time, no.
 3 Q You don't know your income?
 4 A I haven't compiled it.
 5 Q Is it more than \$1,000 a month?
 6 A No.
 7 Q So your income is less than \$1,000 a month?
 8 A I don't -- I don't know. It could be. I don't
 9 know. As I said, I haven't compiled it at this
 10 time. I don't know.
 11 Q Did you file a tax return for 2008?
 12 A I think you've asked me that and I answered it.
 13 Q No. I asked if B. Andrew Brown filed a tax
 14 return. I didn't ask you if you did.
 15 A As a sole --
 16 Q As a person, an individual, did you file a tax
 17 return?
 18 A As a sole single entity LLC, the taxes of
 19 B. Andrew Brown & Associates and Amir Jamal
 20 Tauwab are filed together with a Schedule C.
 21 Q So you're one in the same is what you're
 22 saying?
 23 A No, absolutely not.
 24 Q You're not one in the same?
 25 A No.

1 Q Well, did you have any other income in 2008 --
 2 A No.
 3 Q -- besides B. Andrew Brown?
 4 A No.
 5 Q How about in 2009?
 6 A Didn't have any income in 2009.
 7 Q That's because you were incarcerated; is that
 8 right?
 9 A Correct.
 10 Q How about 2010? Any other income besides
 11 B. Andrew Brown?
 12 A No.
 13 Q Did you file a tax return for 2007?
 14 A Yes.
 15 Q Do you personally own a motor vehicle?
 16 A No.
 17 Q You don't. Have you owned any motor vehicles
 18 since October 15th of 2005?
 19 A Yes.
 20 Q What motor vehicles have you owned?
 21 A A 2007 CLS500.
 22 Q And where is that motor vehicle?
 23 A It was repossessed.
 24 Q And when was it repossessed?
 25 A I don't know.

1 A Yes.
 2 Q Which vehicle did you obtain from them?
 3 A A Harley-Davidson.
 4 Q What kind?
 5 A Ultra Classic.
 6 Q What year was that?
 7 A It was either 2007 or 2008. I can't remember.
 8 Q What's the status of that vehicle, sir?
 9 A My ex-wife sold it.
 10 Q When did she sell it?
 11 A In 2009.
 12 Q Who did she sell it to? Do you know?
 13 A I think she let Carlton sell it for her.
 14 Q Was it sold to you?
 15 A No.
 16 Q Was it sold to B. Andrew Brown?
 17 A No.
 18 Q Was it sold to any other entity in which you
 19 have an interest?
 20 A When?
 21 Q In 2009.
 22 A No.
 23 Q So you have no interest in that vehicle,
 24 correct?
 25 A No.

1 Q What year?
 2 A I believe -- I don't know. I was incarcerated.
 3 Q So you believe it was repossessed while you
 4 were incarcerated?
 5 A Yes.
 6 Q Do you own any other vehicles since
 7 October 15th of 2005?
 8 A No.
 9 Q Did you ever own a 2008 Harley-Davidson?
 10 A Yes, yes.
 11 Q Do you still own that vehicle?
 12 A No.
 13 Q What happened to that vehicle?
 14 A It was repossessed.
 15 Q When was it repossessed?
 16 A While I was incarcerated.
 17 Q Who did you obtain that vehicle from when you
 18 had it?
 19 A Western Reserve Harley-Davidson.
 20 Q Are you familiar with Carlton Harley-Davidson,
 21 Incorporated?
 22 A Yes.
 23 Q How are you familiar with that?
 24 A I have been there.
 25 Q Did you ever obtain a vehicle from them?

1 Q And the LLC that you have an interest in does
 2 not have an interest in that vehicle, correct?
 3 A No.
 4 Q Does B. Andrew Brown own any vehicles?
 5 A It has three vehicles, but I have to turn them
 6 in 'cause I haven't been able to pay.
 7 Q And which vehicles does B. Andrew Brown own?
 8 A Two Hondas and a Navigator.
 9 Q What year are the Hondas?
 10 A '08.
 11 Q What type of Hondas are they?
 12 A Accord and Civic.
 13 Q And where did B. Andrew Brown obtain those?
 14 A Honda of Mentor.
 15 Q Where are those vehicles located right now?
 16 A 27500 Bishop Park Drive.
 17 Q Both of them?
 18 A Yes.
 19 Q Does anyone have access to those vehicles
 20 besides you?
 21 A Donna Blankenship.
 22 Q What's your relationship with Donna
 23 Blankenship?
 24 A Friend.
 25 Q So you allow her to utilize those vehicles?

- 1 A Yes.
 2 Q And those vehicles are owned by B. Andrew
 3 Brown, correct?
 4 A Correct.
 5 Q She's not an employee of B. Andrew Brown,
 6 correct?
 7 A No.
 8 Q You said there's a Lincoln Navigator?
 9 A Yes.
 10 Q Is that another vehicle? What year is that?
 11 A '07.
 12 Q And where did B. Andrew Brown obtain that
 13 vehicle?
 14 A Ganley.
 15 Q Ganley located where?
 16 A Bedford.
 17 Q Ganley of Bedford. And how much is owed on
 18 that vehicle?
 19 A I don't remember offhand.
 20 Q So is B. Andrew Brown making payments on that
 21 vehicle?
 22 A It hasn't made in several months.
 23 Q What were the payments that it was required to
 24 make?
 25 A I don't remember offhand.

- 1 Q You don't remember. Well, who else would know?
 2 A I mean I would know if I looked.
 3 Q When did B. Andrew Brown obtain the vehicle
 4 from Ganley of Bedford?
 5 A October of 2010.
 6 Q Did you have to put something down on behalf of
 7 B. Andrew Brown?
 8 A Yes.
 9 Q How much was put down?
 10 A That I don't remember.
 11 Q Is the balance on the Lincoln Navigator owed to
 12 Ford Motor Credit Company?
 13 A Yes.
 14 Q What was the total purchase price for that
 15 Lincoln Navigator?
 16 A I don't remember offhand.
 17 Q Was it more than \$51,000?
 18 A I don't remember.
 19 Q What percentage did you put down?
 20 A I don't remember.
 21 Q What type of interest rate?
 22 A I don't know.
 23 Q Did you have to sign in a personal capacity --
 24 A No.
 25 Q -- for that vehicle?

- 1 They allowed you to obtain the vehicle
 2 with just B. Andrew Brown?
 3 A Yes.
 4 Q How about these Hondas from Honda of Mentor?
 5 How much is owed on the 2008 Honda Accord?
 6 A I don't remember.
 7 Q How about the 2008 Honda Civic?
 8 A I don't remember.
 9 Q Does B. Andrew Brown utilize any other names
 10 when it does business?
 11 A I don't understand your question.
 12 Q Is it known as anything else? Do you do
 13 business as a different name? Do you represent
 14 yourself to be a different name rather than
 15 B. Andrew Brown?
 16 A Not to my knowledge.
 17 Q You're not known as the Bruce Andrew Brown
 18 Company? It's not the same, right?
 19 A No.
 20 Q They don't represent themselves to be that?
 21 A No.
 22 Q They don't represent themselves to be the Bruce
 23 Andrew Brown Group Limited?
 24 A Who doesn't represent themselves to be the
 25 Bruce Andrew Group Limited?

- 1 Q B. Andrew Brown.
 2 A No.
 3 Q Well, let's talk about the Bruce Andrew Brown
 4 Group Limited. What is that entity?
 5 A A limited liability company.
 6 Q When was that entity created?
 7 A I don't remember.
 8 Q Are you the sole member of the Bruce Andrew
 9 Brown Group Limited?
 10 A I don't remember.
 11 Q Where does Bruce Andrew Brown Group Limited do
 12 business?
 13 A It doesn't.
 14 Q Is it registered with the state of Ohio?
 15 A Yes.
 16 Q Are you the statutory agent for the Bruce
 17 Andrew Brown Group Limited?
 18 A I don't remember.
 19 Q If the records of the secretary of the State of
 20 Ohio reflect that you are, would that be
 21 incorrect?
 22 A I can't remember if I'm the statutory agent or
 23 not.
 24 MR. BERNEY: Why don't you
 25 mark that as number 3?

1 -----
 2 (Deposition Exhibit No. 3 was marked.)
 3 -----
 4 Q I'm going to hand you a document that's been
 5 marked as Deposition Exhibit Number 3. It's a
 6 record from the Ohio Secretary of State
 7 website. It's a Statutory Agent form, update
 8 for --
 9 A Yes.
 10 Q -- the Bruce Andrew Brown Group Limited. Have
 11 you had a chance to look at that document, sir?
 12 A Yes, I've had a chance to look at it.
 13 Q And who does it reflect is the statutory agent
 14 for the Bruce Andrew Brown Group Limited?
 15 A Me. Me.
 16 Q Does it actually say your name and then there's
 17 something after it? Bruce Andrew Brown, Esq.
 18 Is that what it says?
 19 A Yes. Yes.
 20 Q You're not a licensed attorney though, are you?
 21 A Currently I am not.
 22 Q You've never been a licensed attorney in the
 23 state of Ohio; is that a fair statement?
 24 A That's correct.
 25 Q You were a licensed attorney in the state of

1 Q When is the last time it did business?
 2 A I don't remember.
 3 Q You don't remember.
 4 A I would have to look.
 5 Q When was it created? You don't remember? Is
 6 that what your testimony was? Is that correct?
 7 A I don't remember.
 8 Q You don't remember. Did it do business in 2007?
 9 A I don't remember.
 10 Q Why did you set it up?
 11 A Hoping to do business.
 12 Q What type of business?
 13 A Diversity consulting.
 14 Q What do you mean when you say diversity
 15 consulting?
 16 A Diversity consulting. That's what I mean.
 17 Q Can you describe what you mean when you say
 18 diversity consulting?
 19 A Diversity in the workplace.
 20 Q Would that be teaching people how to achieve
 21 that?
 22 A Yes.
 23 Q Do you personally own any stocks or bonds?
 24 A No.
 25 Q Do you have an interest in any IRAs or bank

1 New York at one time; is that correct?
 2 A That's correct.
 3 Q But you were disbarred; is that correct?
 4 A That's correct.
 5 Q And you were disbarred because of several
 6 felony convictions; is that a fair statement?
 7 A That's correct.
 8 Q Would it be fair to say that you have several
 9 felony convictions involving moral turpitude?
 10 A I don't classify the felonies.
 11 Q Do you have any felony convictions involving
 12 questions of honesty, misrepresentation or
 13 forgery?
 14 A I have a -- yes, forgery, yes.
 15 Q You know what moral turpitude is I assume,
 16 right?
 17 A I know how it's used in the criminal justice
 18 system.
 19 Q So you'd agree with me that you do have felony
 20 convictions that would involve moral turpitude?
 21 A No, I wouldn't agree.
 22 Q You wouldn't agree? Okay. Fair enough.
 23 You say the Bruce Andrew Brown Group
 24 Limited doesn't do any business?
 25 A Not today.

1 accounts?
 2 A Other than the bank accounts I have testified
 3 to, no.
 4 Q Do you have any retirement assets?
 5 A No.
 6 Q Are you currently receiving any sort of annuity
 7 payments?
 8 A No.
 9 Q You're not receiving any sort of payments from
 10 any sort of lottery; is that correct?
 11 A No.
 12 Q Are you receiving any forms of government
 13 assistance?
 14 A Yes.
 15 Q Could you tell me what forms of government
 16 assistance you're receiving?
 17 A I receive food stamps.
 18 Q When did you start receiving food stamps?
 19 A June of 2010.
 20 Q That would be upon your release from jail?
 21 A Yes.
 22 Q How much per month do you receive in food
 23 stamps?
 24 A 200.
 25 Q Where did you go to apply for those food

1 stamps?
 2 A To the county. I don't know the name of the
 3 place.
 4 Q Well, where was it located?
 5 A Southgate.
 6 Q Are you aware of what the requirements are for
 7 you to qualify for those food stamps?
 8 A Offhand, no.
 9 Q Were you advised as to what the requirements
 10 were when you applied?
 11 A The gentleman asked me did I have any money. I
 12 told him no.
 13 Q Did you represent to the county that you didn't
 14 have any income?
 15 A I don't remember.
 16 Q Have you had income since you applied for the
 17 food stamps?
 18 A I haven't had any income since I got out of
 19 jail. No.
 20 Q Are you preparing to take a trip anywhere?
 21 A When?
 22 Q In the next two months.
 23 A As of today, no.
 24 Q Are you familiar with an entity called the
 25 Black Skiers Association?

1 A Yeah.
 2 Q Are you planning on attending the Black Skiers
 3 Association event that is going to be held in
 4 Colorado?
 5 A I think you've mischaracterized the name, but
 6 if--
 7 Q Mischaracterized the name of what? The Black
 8 Skiers Association?
 9 A Yes.
 10 Q Well, what is the name?
 11 A The name of what?
 12 Q If you're telling me I mischaracterized it,
 13 what is the name of this entity?
 14 A Of which entity?
 15 Q Related to the black skiers.
 16 A National Brotherhood of Skiers.
 17 Q Okay. The National Brotherhood of Skiers. My
 18 apologies.
 19 Are you planning to attend an event being
 20 held by the National Brotherhood of Skiers in
 21 Colorado?
 22 A I would like to.
 23 Q Did you represent to anyone that you were in
 24 fact attending that event?
 25 A I have.

1 Q Do you have reservations to attend that event?
 2 A As of today, no.
 3 Q Are you a member of the National Brotherhood?
 4 A Yes.
 5 Q Is there a membership fee requirement to become
 6 a member?
 7 A It was when I joined.
 8 Q What was the amount?
 9 A I have no idea.
 10 Q Is there a yearly fee?
 11 A I believe there is.
 12 Q Did you pay the yearly fee for the year 2010?
 13 A No.
 14 Q How about 2011?
 15 A No.
 16 Q How about 2009?
 17 A No.
 18 Q 2008?
 19 A I can't remember.
 20 Q Did you represent to anyone that you were on
 21 the board or in a position of importance with
 22 the National Brotherhood?
 23 A What do you mean?
 24 Q Well, did you represent to anybody that you're
 25 on the board of their association? I don't

1 know what you'd want to call it. Are you a
 2 board member?
 3 A Of?
 4 Q The National Brotherhood.
 5 A No.
 6 Q Do you have a passport?
 7 A It's expired.
 8 Q When did it expire?
 9 A I don't remember.
 10 Q Have you ever been to Dubai?
 11 A No.
 12 Q Have you ever represented to anyone that you
 13 have been to Dubai?
 14 A That I've been or that I was going?
 15 Q That you have been or that you were going.
 16 A That I was going, yes.
 17 Q Who did you represent that you were going to
 18 Dubai to?
 19 A Several people.
 20 Q Tell me who.
 21 A I don't remember offhand.
 22 Q When did you represent to people that you were
 23 going to Dubai?
 24 A This past fall.
 25 Q That would be the fall of the year 2010?

- 1 A That's correct.
 2 Q But you didn't actually go to Dubai?
 3 A No, I didn't.
 4 Q Why didn't you go to Dubai?
 5 A We haven't finalized the business situation
 6 that would have necessitated my presence there.
 7 Q You were going to go in relation to your
 8 business with B. Andrew Brown?
 9 A That's correct.
 10 Q And you said we, am I correct, we did not
 11 finalize the business? Who do you mean by we?
 12 A Me and my client.
 13 Q Who is your client?
 14 A Abdul Hakim.
 15 Q And what was the purpose for you to go to
 16 Dubai?
 17 A Consulting.
 18 Q How was B. Andrew Brown, an entity that hasn't
 19 paid its rent, and yourself, who apparently has
 20 no income reportedly, going to be able to go
 21 and afford the expense of going to Dubai?
 22 A I wasn't going to be able to afford it.
 23 Q Well, then how were you going to go?
 24 A Abdul Hakim was going to pay for it.
 25 Q Where does Abdul Hakim reside?

- 1 A New York and various places in the Middle East.
 2 Q Where in New York?
 3 A I don't have his address offhand.
 4 Q Do you have his address?
 5 A I believe I do.
 6 Q Do you have his phone number?
 7 A No.
 8 Q How do you get in contact with him?
 9 A He calls me.
 10 Q Does he call you on a cell phone?
 11 A I don't think he's ever called me on a cell
 12 phone. He calls the office.
 13 Q He calls your office.
 14 Did you attend the Super Bowl this year?
 15 A No.
 16 Q Did you represent to anyone that you were going
 17 to attend the Super Bowl this year?
 18 A That I was going to or that I wanted to?
 19 Q That you were going to.
 20 A No.
 21 Q Did you represent to anyone that you did attend
 22 the Super Bowl?
 23 A No.
 24 Q Did you represent to anyone that you wanted to
 25 attend the Super Bowl?

- 1 A Yes.
 2 Q How were you going to attend the Super Bowl?
 3 A What do you mean how was I going to?
 4 Q You don't have any income, correct?
 5 A No.
 6 Q So how were you going to attend?
 7 A I didn't go.
 8 Q Are you familiar with the Tauwab Group? Is
 9 that how you say it, Tauwab Group Limited?
 10 A Yes.
 11 Q What is that?
 12 A It's a limited liability company.
 13 Q And when did that company form?
 14 A I don't remember.
 15 Q Are you the sole member of the Tauwab Group
 16 Limited?
 17 A I don't remember that either. It's been a
 18 while since that was formed.
 19 Q What does the Tauwab Group Limited do?
 20 A Nothing. There's nothing -- it's not
 21 operating.
 22 Q It doesn't operate?
 23 A No.
 24 Q Does it own any property?
 25 A No.

- 1 Q Does it own any vehicles?
 2 A No.
 3 Q Has it owned any vehicles since 2005?
 4 A No.
 5 Q No?
 6 A Not that I recall.
 7 Q Not that you recall.
 8 A No. It's been a long time.
 9 Q Did the Tauwab Group ever own a 1994
 10 Mercedes-Benz?
 11 A What type of Mercedes-Benz?
 12 Q Model S50, four-door.
 13 A S50?
 14 Q Yes. S500. Excuse me. S500.
 15 A No.
 16 Q The Tauwab Group never owned that?
 17 A An S500?
 18 Q Yes.
 19 A Not to my knowledge.
 20 Q Well, did the Tauwab Group ever own a 1994
 21 Mercedes-Benz?
 22 A It may have. I don't remember, but I don't
 23 recall the Tauwab Group ever owning an S500.
 24 Q Okay. It may have. Does it still own that
 25 vehicle?

- 1 A No. You said S500?
 2 Q That's what I said.
 3 A Tauwab Group never owned an S500.
 4 Q Did the Tauwab Group ever own a 2002 Cadillac
 5 Escalade?
 6 A It may have. I don't remember.
 7 Q Does it still own that vehicle?
 8 A No.
 9 Q What happened to it?
 10 A What year was this?
 11 Q It would be in 2003.
 12 A I don't remember.
 13 Q You don't remember. Well, does the Tauwab
 14 Group own a vehicle right now?
 15 A No.
 16 Q Did you send an e-mail to someone in January of
 17 this year indicating that the Tauwab Group's in
 18 the market for a new Range Rover?
 19 A Yes, I did.
 20 Q Because the 2008 needed to be replaced?
 21 A Yeah, I did that.
 22 Q Does the Tauwab Group own a 2008 Range Rover?
 23 A No.
 24 Q Does it lease a 2008 Range Rover?
 25 A No.

- 1 Q So that was false, that e-mail, correct?
 2 A It was false.
 3 Q So not true? You sent an e-mail that was not
 4 true?
 5 A I sent an e-mail to Robert Warner who likes to
 6 jib and jab with me, so I give him what he
 7 gives.
 8 Q So you sent him an e-mail that was false?
 9 A Yeah, I did.
 10 Q I'm just trying to clarify it, because I see
 11 it --
 12 A I did.
 13 Q -- I'm aware of it; I'm trying to make sure
 14 it's not true.
 15 A I did. I did.
 16 Q Because if it's true, I want to know what this
 17 vehicle is.
 18 A There is no vehicle.
 19 Q There is no vehicle. It's a figment of your
 20 imagination?
 21 A No. It's not even a figment of my imagination.
 22 Q Well, it doesn't exist, right? It never has?
 23 A As I stated, Robert Warner likes to get at me,
 24 so I give him what he gives.
 25 Q So you were trying to get at Mr. Warner?

- 1 A I give him what he gives.
 2 Q There was never a 2008 Range Rover.
 3 Does the Tauwab Group have any -- am I
 4 saying it right?
 5 A No, but that's all right. I know what you
 6 mean.
 7 Q Say it again for me.
 8 A Tauwab.
 9 Q Tauwab. I'm going to get it right before we
 10 leave.
 11 Does the Tauwab Group have any bank
 12 accounts?
 13 A No.
 14 Q Has it ever had a bank account?
 15 A I don't remember.
 16 Q What was the Tauwab Group set up to do?
 17 A I don't remember that either.
 18 MR. BERNEY: Are you okay?
 19 THE REPORTER: Yes.
 20 MR. BERNEY: Okay. Just
 21 checking.
 22 A Can I ask you a question?
 23 Q We can go off the record for a second.
 24 A 'Cause I don't want to misrepresent anything.
 25 Q Okay.

- 1 A No. I want this to be on the record.
 2 Q Okay. You can put it on the record.
 3 A You asked me about the Tauwab Group in 2003
 4 owning an S500 Mercedes.
 5 Q A 1994 Mercedes-Benz S500 sedan.
 6 A What year?
 7 Q 1994. You owned it in 2003.
 8 A 1994. It may have. I don't remember.
 9 Q It doesn't own it any longer though, correct?
 10 A No, no. I don't want you to think I'm lying to
 11 you about what it owned in 2003 'cause I don't
 12 remember.
 13 Q Did the Tauwab Group have any employees?
 14 A No.
 15 Q And you're saying that you're not sure if
 16 there's any other members of the Tauwab Group?
 17 A I don't remember.
 18 Q We're going to go to Exhibit 1, the duces tecum
 19 part, and we'll go through those documents that
 20 we requested.
 21 A Okay.
 22 Q Okay, sir?
 23 Did you bring with you today a 2008 or
 24 2009 or 2010 federal and state income tax
 25 return?

1 A 2010 isn't due yet. It hasn't been filed yet.
 2 2009, there will be no return because I was
 3 incarcerated. 2008, there will be a return.
 4 Q But you haven't filed it?
 5 A I haven't filed it yet. I'm trying to get the
 6 records.
 7 Q When will you have those records?
 8 A If they're -- if they're with my ex-wife, I'm
 9 not sure. If they're with the property that
 10 was in my office when I paid my previous
 11 landlord, 'cause I had some stuff there, that's
 12 still stored there.
 13 Q Who is your ex-landlord?
 14 A 55 Public Square.
 15 Q So you believe you have some records that are
 16 stored there?
 17 A Yes.
 18 Q When did you or the entities you're affiliated
 19 with utilize 55 Public Square?
 20 A 2008.
 21 Q You brought some bank statements today. From
 22 what I see, you have brought a Huntington Bank
 23 account for September 2010 for B. Andrew Brown,
 24 for November 2010 for B. Andrew Brown, for
 25 October 2010, for December 2010 and for

1 January 2011. That's correct?
 2 A That's correct.
 3 Q Item 2 asks you to bring any other bank
 4 accounts in the period January 1st, 2008
 5 through the date of February 11, 2011. You
 6 didn't bring any other bank account statements?
 7 A I didn't keep my Chase statements. I requested
 8 them, but I don't have them yet.
 9 Q Let's go to item 3. We asked you to bring
 10 copies of all titles and leases for any autos
 11 or motor vehicles or recreation vehicles in
 12 your name or in which you have operated since
 13 January 1st of 2008. Did you bring any motor
 14 vehicle titles with you today?
 15 A I don't have any titles.
 16 Q You don't have any titles, but you've utilized
 17 vehicles from B. Andrew Brown, correct?
 18 A Yes.
 19 Q But you didn't bring any of those titles with
 20 you?
 21 A I don't have titles of those vehicles.
 22 Q You don't have a Certificate of Memorandum
 23 title?
 24 A I have a Memorandum of Title, but this asks for
 25 title.

1 Q So you have a Memorandum of Title. Are you
 2 willing to produce the Memorandum of Title?
 3 A Sure.
 4 Q I'll ask you to produce that --
 5 A Sure.
 6 Q -- for all those vehicles. And when I say
 7 those vehicles, I'm referring to the 2008 Honda
 8 Accord, the Civic and the Lincoln Navigator.
 9 Do we understand each other?
 10 A Yeah.
 11 Q We asked you to bring copies of deeds to all
 12 real estate that you occupy or in which you
 13 have an ownership interest. Did you bring any
 14 of those?
 15 A I don't have any deeds. They're with the stuff
 16 that my ex-wife has.
 17 Q In item 5, we asked you to bring all stocks,
 18 bonds, CDs, savings bonds and IRAs held by you
 19 or for your benefit from January 1st, 2000 to
 20 the present. You didn't bring any documents;
 21 is that correct?
 22 A I don't have that.
 23 Q There are no documents that exist? That's what
 24 your testimony is?
 25 A What's that?

1 Q No documents exist with respect to number 5?
 2 A No, none exist.
 3 Q How about number 6? We asked for the corporate
 4 record books, Articles of Incorporation or
 5 Operating Agreements.
 6 A That's with the stuff that I believe my ex-wife
 7 has.
 8 Q So you didn't bring those documents?
 9 A No, I didn't.
 10 Q Item number 7, we asked you to bring copies of
 11 any and all documents, applications and
 12 accounting history related to any mortgage
 13 loans taken by you for the period January 1st,
 14 2000 to the present, including but not limited
 15 to the loan on the property known as 6075 Penfield
 16 Lane, Solon, Ohio, 44139.
 17 Did you bring any of those documents
 18 today?
 19 A I don't have them. They're in the stuff with
 20 my ex-wife.
 21 Q I just want to make sure because you have a
 22 couple ex-wives.
 23 A Suzanne. I'm sorry.
 24 Q Which ex-wife are you referring to?
 25 A Suzanne Charlton. I'm sorry.

- 1 Q Suzanne Charlton?
 2 A Right.
 3 Q Is that her name?
 4 A Yes.
 5 Q Do you know where she resides?
 6 A I think in Solon. I'm not sure.
 7 Q How about the request in item number 8? Did
 8 you bring any of those documents with you?
 9 A The ones that I have would be with her.
 10 Q Tell me what Success Images - Brookins
 11 Athletics and Physical Education, Incorporated
 12 is.
 13 A I have no idea.
 14 Q You don't know what that is?
 15 A I have no idea.
 16 Q You have no idea. Okay.
 17 A Is it a company that I'm the agent for? That
 18 could be, but I don't know and I don't want to
 19 speculate. I don't know.
 20 Q Do you know what R.L. Campbell Enterprises
 21 Limited is?
 22 A I think that's a company owned by Ronald
 23 Campbell.
 24 Q Is Ronald Campbell a client of B. Andrew Brown?
 25 A No, not at present.

- 1 Q Was he a client of B. Andrew Brown?
 2 A Previously, yes.
 3 Q Did B. Andrew Brown receive compensation from
 4 Ronald Campbell or R.L. Campbell for the
 5 services it provided to him or it?
 6 A I can't remember offhand.
 7 Q Do you know what a Best Car Care Service, LLC
 8 is?
 9 A Best Car Care Service? I would have to look at
 10 it.
 11 Q Do you know who Raymond Buildt is?
 12 A Yes.
 13 Q Who is Raymond Buildt?
 14 A He's a former client.
 15 Q He's a client of B. Andrew Brown?
 16 A Yes.
 17 Q When you say he's a former client, he's no
 18 longer a client?
 19 A He's deceased.
 20 Q Do you know who Vincent Brookins is?
 21 A Yes.
 22 Q Who is Vincent Brookins?
 23 A We went to high school, junior high school
 24 together.
 25 Q Did you incorporate Success Images - Brookins

- 1 Athletic and Physical Education, Incorporated
 2 with Vincent Brookins?
 3 A I can't remember. What year is this?
 4 Q 2006.
 5 A I can't remember.
 6 Q It's possible that you did, but you just don't
 7 remember; is that correct?
 8 A I don't remember.
 9 Q You don't receive any income from that entity,
 10 do you?
 11 A No.
 12 Q Do you know what B. Alexander & Associates is?
 13 A Offhand, no.
 14 Q Are you affiliated with B. Alexander &
 15 Associates, LLC?
 16 A Not that I -- not as of today and I can't
 17 recall if I ever was.
 18 Q Do you receive any income from B. Alexander &
 19 Associates, LLC?
 20 A No. No.
 21 Q Are you familiar with an entity called Complete
 22 Paralegal Services?
 23 A Yes.
 24 Q What is that?
 25 A That was an entity that I worked for in -- it's

- 1 been years. I can't remember. It's an entity
 2 I created and worked for.
 3 Q Did you ever reside at 31810 Bainbridge Road in
 4 Solon, Ohio?
 5 A Yes.
 6 Q What dates did you reside there?
 7 A Until -- I know I moved in January of 2008 from
 8 there. I don't remember when I moved there.
 9 Q Who did you reside there with?
 10 A Suzanne Charlton and Kyle Marbury.
 11 Q Kyle Marbury, is that your son?
 12 A That's Suzanne's son's.
 13 Q That's Suzanne's son. My apologies.
 14 You moved from there in January 2008.
 15 Would it be fair to say that you moved to the
 16 Penfield property in Solon at that time?
 17 A Yes, I did. Yes.
 18 Q Did you own the property at 31810 Bainbridge,
 19 Solon?
 20 A No. No.
 21 Q You rented the property; is that correct?
 22 A Suzanne did.
 23 Q Suzanne rented the property.
 24 Did you contribute any portion toward the
 25 rent?

- 1 A Yes.
 2 Q How did you do that if you didn't have any
 3 income?
 4 A When?
 5 Q 2008. I'm sorry. 2007. Because you moved in
 6 January 2008, right? That was your testimony,
 7 right?
 8 A Yes.
 9 Q So you contributed toward the rent in 2007?
 10 A Yes.
 11 Q How did you do that if you didn't have any
 12 income in 2007?
 13 A Borrowed it.
 14 Q Who did you borrow it from?
 15 A I don't remember.
 16 Q Did you pay the people that you borrowed it
 17 from back?
 18 A No.
 19 Q Does anyone owe you money?
 20 A Yes.
 21 Q Who owes you money?
 22 A I would have to look. I don't know offhand.
 23 Q You don't know who owes you money?
 24 A People owed me money when I left to go to jail,
 25 but I can't remember who.

- 1 Q How much are you owed?
 2 A I don't know. I would have to look at the
 3 records.
 4 Q Where are these records located?
 5 A Suzanne.
 6 Q Are you involved in any litigation with her
 7 right now?
 8 A Yes.
 9 Q Could you tell me what cases you're involved
 10 with?
 11 A When you say tell you what cases, what do you
 12 mean?
 13 Q You said you're involved in litigation with
 14 Suzanne Charlton. What's the nature of the
 15 litigation and where is the case at?
 16 A One's in the Court of Appeals and one's in --
 17 no. Two are in Common Pleas.
 18 Q So Cuyahoga County Court of Appeals?
 19 A Yes.
 20 Q So when you say Court of Appeals, that's the
 21 court you're referring to?
 22 Well, what's the nature? You've got
 23 three cases with her. Tell me about the first
 24 case.
 25 A The one that's in the Court of Appeals is where

- 1 she sold the motorcycle.
 2 Q So she sold your motorcycle and you have a case
 3 involving that. What's the complaint based
 4 upon?
 5 A She was -- she sold the motorcycle that was
 6 owned by Brown & Associates and converted the
 7 funds to her personal use when she's supposed
 8 to use the funds to maintain the property owned
 9 by Brown & Associates.
 10 Q Which property was she supposed to maintain?
 11 A 6075 Penfield Lane.
 12 Q That's the one in the Court of Appeals?
 13 A Right.
 14 Q Would it be fair to say there was a decision in
 15 the lower court and that's why it's in the
 16 Court of Appeals?
 17 A Yes.
 18 Q What was the decision in the lower court?
 19 A It was dismissed.
 20 Q The case was dismissed. Was it dismissed with
 21 or without prejudice?
 22 A With.
 23 Q You said you had another case involving Suzanne
 24 Charlton?
 25 A Yes. There was a -- in a divorce decree which

- 1 I had never saw till I came home. It said that
 2 we had agreed to the distribution of property
 3 and there was no agreement.
 4 Q And where is that case filed?
 5 A Cuyahoga County.
 6 Q Is there any other party to that case besides
 7 Suzanne Charlton?
 8 A The guy that represented her.
 9 Q What's his name?
 10 A I don't remember offhand.
 11 Q Would it be William Brown?
 12 A Yeah, that's it.
 13 Q That's William Brown.
 14 Is that case still pending?
 15 A Yes.
 16 Q What's the other case involving Suzanne
 17 Charlton?
 18 A She called the gas company -- well, she wrote
 19 the gas company and had the gas turned off at
 20 the Penfield house.
 21 Q And when did this occur?
 22 A December of 2009.
 23 Q So you filed a lawsuit against her with respect
 24 to that?
 25 A Yes.

1 Q Is that case still pending?
 2 A Yes.
 3 Q Do you know who the judge in that case is?
 4 A Not offhand.
 5 Q Do you have another case that you filed related
 6 to that against Suzanne Charlton?
 7 A What do you mean?
 8 Q Well, I have a case docket here. It's case
 9 CV-10-724016 and it indicates --
 10 A That's the case that's in the Court of Appeals.
 11 Q This is the one that's in the Court of Appeals?
 12 A Yes.
 13 Q So parties to that case, Carlton Harley-
 14 Davidson and it looks like East Ohio Gas
 15 Company, tried to make them a party, but that
 16 wasn't allowed, correct?
 17 A That's correct.
 18 Q So you're appealing the decision involving
 19 Suzanne Charlton and Carlton Harley-Davidson
 20 and Jane Carlton I assume?
 21 A Correct.
 22 Q Not the decision as it relates to East Ohio
 23 Gas?
 24 A No.
 25 Q Who is representing B. Andrew Brown in those

1 cases?
 2 A Mr. Rawls.
 3 Q Is he being paid?
 4 A I think you've asked and answered it. I mean
 5 you've asked that and I answered the question.
 6 Q I asked if B. Andrew Brown pays him monthly.
 7 Now I'm asking you about these cases. Is he
 8 being paid with respect to these cases?
 9 A I have answered that question.
 10 Q Well, I don't think you have, but is he being
 11 paid with respect to these cases?
 12 A Asked and answered.
 13 Q Did he take these on a contingency basis?
 14 A My business with my lawyer is privileged, and I
 15 say my as the owner of the business. My
 16 business with that counsel is privileged
 17 information.
 18 Q Well, we can let the Judge decide that,
 19 because, unfortunately, unless you've run for
 20 election, I don't think you get to make that
 21 decision.
 22 A I don't think you do either.
 23 Q I didn't say I did.
 24 A I didn't say I did.
 25 Q I said the Judge gets to make that decision.

1 Are you involved in any other litigation
 2 right now?
 3 A Other than what I've told you?
 4 Q Yes.
 5 A Foreclosure.
 6 Q Did you ever have a case against the Bedford
 7 Municipal Court?
 8 A I don't know.
 9 Q You didn't file a lawsuit against Bedford
 10 Municipal Court?
 11 A Oh, Affidavit of Disqualification.
 12 Q For who?
 13 A For me.
 14 Q To disqualify you?
 15 A Oh, no. To disqualify the judge.
 16 Q Which judge did you wish to disqualify?
 17 A I don't even -- I don't remember that.
 18 Q What was the result of that case?
 19 A It was dismissed.
 20 Q There's a foreclosure pending?
 21 A Yes. Can we go off the record? May I check my
 22 phone?
 23 MR. BERNEY: Sure. We can
 24 take a break. You can get a drink of water,
 25 get some coffee if you need to. We can take a

1 five-minute break.
 2 (Short break taken.)
 3 -----
 4 (Deposition Exhibit No. 4 was marked.)
 5 -----
 6 BY MR. BERNEY:
 7 Q We're back on the record.
 8 Mr. Tauwab, you indicated you were
 9 involved in some foreclosure litigation; is
 10 that correct?
 11 A Yes.
 12 Q Did you bring a counterclaim in that
 13 litigation?
 14 A In the foreclosure?
 15 Q Yes.
 16 A No.
 17 Q You didn't. Are you involved in a lawsuit
 18 regarding some property that was located at the
 19 Penfield Lane address?
 20 A Yes.
 21 Q Tell me about that lawsuit.
 22 A Items were stolen from my house.
 23 Q What items were stolen from your house?
 24 A Several.
 25 Q Could you describe the items for me?

1 A I don't have the list here in front of me
 2 today, so I don't know.
 3 Q Did you claim that you had Rolex watches stolen
 4 from your house?
 5 A Yes, I did.
 6 Q How many Rolex watches did you have stolen from
 7 your house?
 8 A I don't remember offhand.
 9 Q More than one?
 10 A Yes.
 11 Q More than two?
 12 A On the advice of counsel, I'm not going to
 13 discuss pending litigation. The complaint
 14 speaks for itself. There is a police report
 15 attached to the complaint that specifically
 16 states each and every item that was stolen.
 17 Q You're not represented by counsel in that case,
 18 are you?
 19 A I will be. They just haven't appeared here.
 20 Q Who is your counsel?
 21 A It's going to be William Douglas and Marc Dann.
 22 Q Do you mean James Douglas and Marc Dann?
 23 A He goes by Bill Douglas, so I assumed his name
 24 was William. I don't know his -- Mr. Douglas
 25 and Mr. Dann.

1 Q Are they in the same office?
 2 A Yes.
 3 Q And they advised you not to answer that
 4 question today?
 5 A Well, they advised me -- well, that among
 6 others.
 7 Q That among others. What's the privilege for
 8 you answering and telling me what you
 9 supposedly lost and that was stolen from you?
 10 A I have no idea.
 11 Q Well, I want to understand the nature of your
 12 claim. How much are you seeking to recover in
 13 that lawsuit?
 14 A I believe the amount of what was taken was
 15 about \$150,000.
 16 Q So you're suing for \$150,000.
 17 A I didn't say that.
 18 Q Okay. How much are you suing for?
 19 A I don't remember offhand, but I know there's a
 20 punitive claim, too.
 21 Q Did you file the lawsuit yourself?
 22 A Yes.
 23 Q So who else would know what you're suing for
 24 other than you?
 25 A I can look at it. The lawsuit will tell you,

1 but to tell you offhand, no, I can't. I filed
 2 that lawsuit back in the summer.
 3 Q Are you seeking in excess of \$150,000 in
 4 damages?
 5 A I believe so, because there's a punitive claim,
 6 but for how much, I can't remember.
 7 Q Who is the lawsuit against?
 8 A There are several defendants.
 9 Q Well, who removed the property?
 10 A Mr. Warner's clients.
 11 Q Did you have insurance on the property? This
 12 property is Penfield Lane, right?
 13 A That's correct.
 14 Q Was there insurance on the property?
 15 A Not at that time.
 16 Q No insurance. Did you make an insurance claim
 17 for those items?
 18 A No.
 19 Q Let's talk about this property that was stolen.
 20 When did you acquire it?
 21 A Over the years.
 22 Q Did you acquire it before October 15th of 2005?
 23 A I can't remember. Some of it I'm sure.
 24 Q Did you acquire those Rolex watches before
 25 October 15th, 2005?

1 A Some of them.
 2 Q Some of them you did?
 3 A Yes.
 4 Q Why weren't they listed on your bankruptcy
 5 petition that you filed on October 15th of
 6 2005?
 7 A Because I didn't know where they were. I was
 8 involved in a litigation with my sister because
 9 all of the information -- not information but
 10 property, anything of value that I had, I had
 11 no access to it at that time and I did not know
 12 what I did have. And if you look at the --
 13 well, never mind. But, no, I didn't -- at that
 14 time when I filed my bankruptcy, they were not
 15 in my possession. I did not believe that they
 16 still existed.
 17 Q Well, when you say that you didn't believe that
 18 they still existed, I want to clarify that,
 19 because existed means they never were there,
 20 they're not real, right? Would you agree with
 21 me?
 22 A I'm not going to get into a discussion of
 23 semantics. When I filed my bankruptcy, I
 24 didn't have the watches. I didn't know where
 25 the watches were.

- 1 Q So your testimony is that when you filed the
2 bankruptcy, you didn't own the watches?
3 A No, that's not my testimony at all.
4 Q So when you filed the bankruptcy, you did own
5 the watches, but you didn't know where they
6 were?
7 A That's not my testimony either.
8 Q Well, what is your testimony?
9 A My testimony is, at the time that I filed the
10 bankruptcy, the watches were not in my
11 possession, I didn't know where they were and I
12 didn't know even if they still existed.
13 Q But you had acquired them before you filed the
14 bankruptcy?
15 A Some of them.
16 Q But you didn't know where they were?
17 A I have asked -- objection. The question's
18 asked and answered.
19 Q Well, you're not here to object.
20 A I am here to object.
21 Q Well, I'm asking you to answer the question.
22 I'm satisfied with the question and I believe
23 it's reasonably designed to lead to discovery
24 of admissible evidence and I'm asking you --
25 A I have answered the question.

- 1 Q I don't believe you have, sir.
2 A I believe I have.
3 Q Well, I don't believe you have, and if you
4 like, we can do it March 5th which is fine with
5 me.
6 Fair to say that those watches were not
7 listed on your bankruptcy petition, correct?
8 A I have answered that question.
9 Q No, you haven't. I didn't ask that question.
10 Were they listed on your bankruptcy
11 petition?
12 A I haven't seen the bankruptcy petition. I
13 don't know.
14 Q Were they listed on your bankruptcy petition?
15 Yes or no, sir.
16 A I would have to look at the bankruptcy
17 petition.
18 Q I can arrange that.
19 MR. BERNEY: Let's go off
20 the record.
21 (Discussion held off the record.)
22 Q We'll go back on the record.
23 What's the current status of the lawsuit
24 involving the property on Penfield?
25 A It's pending.

- 1 Q Is it set for trial?
2 A Yes.
3 Q When is it set for trial?
4 A I don't know.
5 Q Who did you acquire these watches from?
6 A My dad, some of them. Some of them I
7 purchased.
8 Q Who did you purchase them from?
9 A I can't remember.
10 Q You don't remember?
11 A I would have to look. I don't have the --
12 Q What would you look at to tell you who you
13 purchased them from?
14 A I have to find a list. Some of them were
15 purchased from an individual. Some of them
16 were purchased at a store.
17 Q What store were they purchased at?
18 A In New York.
19 Q What's the name of the store?
20 A I don't remember the name of the store.
21 Q Where is it located?
22 A Diamond District.
23 Q Do you have a receipt for it?
24 A All my receipts were destroyed when my home was
25 basically destroyed by water damage.

- 1 Q So the answer would be that you do not have a
2 receipt for it, that the receipt was destroyed,
3 correct?
4 A No.
5 Q That would not be your answer?
6 A No, I don't have a receipt. That's my answer.
7 Q Your answer is you don't have a receipt.
8 What's the name of the individual that
9 you purchased some of these watches from?
10 A Julius Resnick.
11 Q Where is Julius Resnick located?
12 A I have no idea at this time.
13 Q Where was he located when you purchased the
14 watches from him?
15 A I can't remember where he was located.
16 Q Well, where did you purchase them? What state?
17 A Ohio.
18 Q Did he have a store?
19 A Julius was like an independent dealer.
20 Q And how did you know of Julius Resnick?
21 A I can't remember how we met.
22 Q Was this a person that visited your home?
23 A Office.
24 Q He visited your office. Is that where you
25 purchased the watches at?

- 1 A I can't remember.
 2 Q Was he a client of B. Andrew Brown?
 3 A No.
 4 Q Was he a client of any of the other entities?
 5 A I'm going to object to this line of questioning
 6 because it has no relevance on my debt to the
 7 Supreme Court as these dealings were long
 8 before I had a debt to the Supreme Court.
 9 Q Well, actually it does have relevance, sir,
 10 because I am trying to figure out how an
 11 individual who files bankruptcy in 2005 and has
 12 reportedly had no income since then is able to
 13 acquire Rolex watches which at a minimum start
 14 at about 5 to 10 grand and most likely are 20 --
 15 A I didn't say I didn't have any income since
 16 2005.
 17 Q That's what I'm trying to figure out, so you
 18 can either answer the question now or we'll do
 19 it March 5th.
 20 A We'll do it March 5th because I don't see where
 21 this is relevant to a debt to the Supreme Court
 22 that came about in 2008.
 23 Q I'm trying to figure out where you get your
 24 money from, sir.
 25 A I work.

- 1 Q But you don't have any income according to you.
 2 A Not today. You didn't ask me about when I
 3 bought the watches.
 4 Q Okay, sir. When did you first go to jail?
 5 What year?
 6 A I don't remember.
 7 Q You don't remember. Were you in jail in 2005?
 8 A Yes.
 9 Q What portion?
 10 A I don't remember.
 11 Q Did you buy the watches from Julius Resnick
 12 before 2005 or after 2005?
 13 A I don't remember. Oh, yeah, after. After
 14 2005.
 15 Q It was after 2005?
 16 A Yeah, after 2005.
 17 Q You were in jail in 2006?
 18 A No.
 19 Q Did you file a tax return for 2006?
 20 A Yes.
 21 Q Do you have a copy of that tax return?
 22 A No.
 23 Q Did you file both a federal and state tax
 24 return?
 25 A I don't remember.

- 1 Q Did you buy the watches from Julius Resnick in
 2 2006?
 3 A No.
 4 Q Did you buy them in 2007?
 5 A I believe it was 2007. I'm not sure.
 6 Q Did you have income in 2007?
 7 A No, it wasn't 2007. No, it wasn't 2007.
 8 Q It was not 2007?
 9 A It was not 2007.
 10 Q Was it 2008?
 11 A Yeah, I believe it was.
 12 Q We know it wasn't 2009, correct?
 13 A That's correct. I believe it was 2008.
 14 Q You believe it was 2008. Did you have income
 15 in 2008?
 16 A As I stated earlier, I don't know exactly what
 17 my income was in 2008 because I do not have all
 18 the records. I'll have to get them from my
 19 ex-wife.
 20 Q You believe you had income in 2008?
 21 A I know I had income, but to what amount, I
 22 don't know.
 23 Q Fair enough. You haven't filed a tax return
 24 for 2008 yet? We established that, right?
 25 A That's correct.

- 1 Q I want to hand you what's been marked as
 2 Deposition Exhibit Number 4. I'm going to ask
 3 you to take a look at this document. Let me
 4 know when you've had a chance to look at it,
 5 sir.
 6 A I looked at it.
 7 Q Have you ever seen that document before?
 8 A It was presented to me in a deposition.
 9 Q Okay. It was presented to you in a deposition.
 10 Did you ever see it prior to that deposition?
 11 A I have no recollection of ever seeing that
 12 before.
 13 Q I'm going to ask you to look at the third page
 14 of that document which I'll put on the top for
 15 you. Look down the document. Do you see
 16 anywhere on there where there's a signature?
 17 A Yes.
 18 Q Does that appear to be your signature?
 19 A It appears to be.
 20 Q Is there a date after that signature?
 21 A Yes.
 22 Q And what's the date after the signature?
 23 A 1-6-08, but being that I'm not a handwriting
 24 expert, I can't state whether or not it is my
 25 signature.

- 1 Q Do you know who the Real Estate Mortgage Corp.
2 is?
- 3 A Yes.
- 4 Q Who is it?
- 5 A It's a company -- well, it's a company that
6 used to do mortgages.
- 7 Q Did they do the mortgage on Penfield Lane?
- 8 A Yes.
- 9 Q So on Deposition Exhibit Number 4 under Assets
10 and Liabilities on page 3, it says Schedule of
11 Real Estate Owned at the top. Do you see that?
- 12 A I see that.
- 13 Q Does it say that you owned 4403 St. Clair
14 Avenue in Cleveland, Ohio?
- 15 A It states that. I never stated that.
- 16 Q That wasn't true though, right?
- 17 A I never stated that.
- 18 Q I didn't ask that, sir. I said that's not
19 true. Right?
- 20 A I never owned 4403 and I have told you I don't
21 remember seeing that document prior to a
22 deposition in another case.
- 23 Q Well, who did you get this mortgage from?
- 24 A Real Estate Mortgage Corporation.
- 25 Q What was the name of the person that you worked

- 1 with at Real Estate Mortgage Corporation to get
2 this mortgage from?
- 3 A Colleen Miln and --
- 4 Q Colleen. How do you spell her last name?
- 5 A I don't know how do you spell that.
- 6 Q Mill?
- 7 A Miln.
- 8 Q M-i-l-n?
- 9 How did you get in touch with her?
- 10 A I don't remember.
- 11 Q When you filled out this mortgage and got the
12 mortgage on the Penfield property, did you
13 provide documents --
- 14 A I never testified that I filled out that
15 mortgage. Well, that application.
- 16 Q I said, when you got the mortgage on the
17 Penfield property --
- 18 A Okay.
- 19 Q -- did you provide documentation to Real Estate
20 Mortgage Corporation in order to get the
21 mortgage.
- 22 A I can't remember.
- 23 Q Did you provide information to them in order to
24 get the mortgage?
- 25 A I can't remember what I provided.

- 1 Q Well, they have a date of birth on here that's
2 your date of birth. Would you have provided
3 that to them?
- 4 A I can't remember what I provided.
- 5 Q Well, they have a Social Security number on
6 here that purports to be your Social Security
7 number. Did you --
- 8 A I'm not trying to be evasive. I don't remember
9 what I provided them.
- 10 Q Did you provide that information to them?
- 11 A I don't remember what I provided them.
- 12 Q On here they have listed name and address of
13 employer, Brown & Associates at 4403 St. Clair
14 Avenue, Cleveland, Ohio, 44103. Did you
15 provide that information to them?
- 16 A I would not have provided that information.
- 17 Q You would not?
- 18 A No.
- 19 Q Did you or any of the entities, B. Andrew
20 Brown, the Tauwab Group, the Bruce -- what was
21 the other one? -- the Group Limited, Bruce
22 Andrew Brown Group Limited, did they ever have
23 offices at 4403 St. Clair Avenue?
- 24 A Yes.
- 25 Q What period of time did you have offices there?

- 1 A I don't remember.
- 2 Q Was it after 2005?
- 3 A Yes.
- 4 Q Were you there in 2008?
- 5 A Part of it.
- 6 Q Did you ever provide to Real Estate Mortgage
7 Corporation that your monthly income on
8 commissions were \$13,625 a month in 2008?
- 9 A I don't remember.
- 10 Q You don't remember telling them that?
- 11 A I don't remember.
- 12 Q You don't remember.
- 13 So I want to be clear. You don't
14 remember. So it's possible you told them that,
15 you just don't remember?
- 16 A I don't remember.
- 17 Q Okay. Possible you told them that, but you
18 don't remember?
- 19 A I don't remember.
- 20 Q Did you have a checking account with Chase in
21 January of 2008?
- 22 A I don't remember.
- 23 Q Did you have \$149,000 in a checking account
24 with Chase in January of 2008?
- 25 A In Chase?

- 1 Q Yes.
 2 A I believe it was in National City.
 3 Q Did you represent to Real Estate Mortgage
 4 Corporation that you had \$200,000 in liquid
 5 assets in January of 2008?
 6 A I don't remember.
 7 Q When you acquired the property on Penfield, how
 8 much money did you put down --
 9 A Let me go back.
 10 Q Go back to what?
 11 A Yeah, it was National City where that money
 12 was.
 13 Q National City, not Chase?
 14 A National City.
 15 Q So you had \$149,000 in a checking account at
 16 National City Bank?
 17 A I don't remember exactly how much, but
 18 something like that.
 19 Q It was approximately that amount in January of
 20 2008?
 21 A 'Cause that was my down payment.
 22 Q And this would have been from income you earned
 23 in 2007?
 24 A I didn't earn any income in 2007.
 25 Q You didn't earn any income in 2006, right?

- 1 A Yeah.
 2 Q You did? How much?
 3 A I don't remember.
 4 Q Was it more than a \$149,000?
 5 A I don't remember.
 6 Q Well, you didn't have that income in 2005,
 7 right?
 8 A I had some income in 2005. I don't remember
 9 how much.
 10 Q You filed bankruptcy October 15th of 2005,
 11 right?
 12 A I don't remember the exact date.
 13 Q You didn't have \$149,000?
 14 A At that time, no.
 15 Q At that time, right.
 16 A No.
 17 Q So sometime after your bankruptcy discharge and
 18 prior to January 2008, you acquired \$149,000 or
 19 saved \$149,000; is that correct?
 20 A I don't remember the exact figure, but
 21 approximately.
 22 Q Okay. Well, we'll use approximately then.
 23 A 100 -- between 125 and 150. I can't remember
 24 exactly, 'cause I know that's what the down
 25 payment was.

- 1 Q Where did you acquire that money from?
 2 A Working.
 3 Q Working with B. Andrew Brown?
 4 A Some of it probably, yes.
 5 Q Where else were you working in 2006?
 6 A Bruce Andrew Brown Group.
 7 Q Well, when is the last time Bruce Andrew Brown
 8 Group did any business?
 9 A 2008 I believe.
 10 Q Have you given away or transferred any real
 11 estate or property within the last five years
 12 besides this property on Penfield Lane?
 13 A No.
 14 Q Have you given away or transferred any personal
 15 property within the last five years?
 16 A I don't understand what you mean personal
 17 property.
 18 Q Have you given anyone a vehicle, an automobile?
 19 A Have I given someone an automobile?
 20 Q Yes.
 21 A No.
 22 Q Have you transferred an automobile to anyone?
 23 A Not that I recall.
 24 Q Have you given anyone any other sort of gifts?
 25 A My wife.

- 1 Q This would have been Suzanne Charlton, correct?
 2 A When are you talking?
 3 Q Since 2005.
 4 A Yes, Suzanne Charlton.
 5 Q What gifts did you give her?
 6 A I can't remember.
 7 MR. BERNEY: We can go off
 8 the record for a minute.
 9 (Discussion held off the record.)
 10 -----
 11 (Deposition Exhibit No. 5 was marked.)
 12 -----
 13 BY MR. BERNEY:
 14 Q We can go back on the record.
 15 Mr. Tauwab, while we were on break, you
 16 indicated you wanted to clarify some things.
 17 I'll give you the opportunity to do that.
 18 A No, not clarify, but I do recall the watches
 19 aren't listed on my bankruptcy petition.
 20 Q Let's hand you your bankruptcy petition which
 21 is Exhibit 5 --
 22 A I'm familiar with it.
 23 Q -- which is Deposition Exhibit 5. And your
 24 recollection now is that watches aren't listed
 25 on your bankruptcy petition?

1 A No, they're not.
 2 Q And as you testified, they were not in your
 3 possession at the time?
 4 A That's correct.
 5 Q That's correct?
 6 But they may have existed, they just
 7 weren't in your possession, correct?
 8 A They were not in my possession. I didn't know
 9 where they were. I had been incarcerated, and
 10 when I came home, I didn't have anything.
 11 Q Well, when did you come home and find you
 12 didn't have anything?
 13 A In 2005.
 14 Q In 2005.
 15 A And --
 16 Q Where were you incarcerated prior to that?
 17 A Prior to 2005?
 18 Q Yes.
 19 A Shoot. I don't --
 20 Q What state were you in?
 21 A I've only been incarcerated in Ohio.
 22 Q You were in Ohio. Okay.
 23 This property on Penfield Lane, when is
 24 the last time that B. Andrew Brown made a
 25 mortgage payment on that property?

1 A I don't remember.
 2 Q Would it have been prior to 2011?
 3 A Yes.
 4 Q Did they make any mortgage payments in 2010?
 5 A No.
 6 Q How much is currently owed on that property?
 7 Do you know?
 8 A I'm not sure.
 9 Q Do you have an idea?
 10 A No.
 11 Q In 2008, did you have a second mortgage with
 12 New Huntington --
 13 A No.
 14 Q -- that was an asset?
 15 A No.
 16 Q So if your loan application says that, that
 17 would be incorrect?
 18 A The mortgage was with Real Estate Mortgage
 19 Corporation.
 20 Q That's not my question. I realize you got a
 21 mortgage with Real Estate Mortgage Corporation,
 22 but in 2008 when you applied for your mortgage,
 23 did you have a second mortgage --
 24 A With what property?
 25 Q -- through New Huntington?

1 I don't know, sir.
 2 A I don't know what you're talking about.
 3 Q So if something like that appeared on your
 4 mortgage application, you don't know what I'm
 5 talking about?
 6 A If you're referring to the mortgage application
 7 Deposition Exhibit 4 --
 8 Q That's what I'm referring to.
 9 A -- I don't know what that is.
 10 Q You've never seen it before?
 11 A I never -- yeah. I saw it at the deposition in
 12 the litigation in Cuyahoga County.
 13 Q But you never saw it prior to that?
 14 A No. But the mortgage application I saw was
 15 handwritten.
 16 Q Was there an appraisal when you bought this
 17 property on Penfield?
 18 A Yes.
 19 Q Who performed the appraisal? Do you know?
 20 A I don't know.
 21 Q Did you pay for the appraisal?
 22 A I don't know that either. That was set up by
 23 Real Estate Mortgage Corporation.
 24 Q Did you get settlement forms from Real Estate
 25 Mortgage Corporation with respect to that

1 mortgage?
 2 A Yes.
 3 Q Where are those located?
 4 A My ex-wife.
 5 Q And your testimony is you don't know where your
 6 ex-wife resides currently; is that right?
 7 A No. I said I think she resides in Solon.
 8 Q Do you know the address?
 9 A 32325 Franklin Drive.
 10 Q Are you in contact with your ex-wife?
 11 A No.
 12 Q Have you ever verbally asked her for these
 13 records?
 14 A Yes.
 15 Q When was the last time you verbally asked her
 16 for the records?
 17 A When I was incarcerated.
 18 Q And that would have been in 2010?
 19 A No. I asked her for them in 2009.
 20 Q So you haven't spoken to her since 2009 with
 21 respect to those records?
 22 A That's correct, not verbally.
 23 Q Have you written her since 2009 --
 24 A Yes.
 25 Q -- with respect to those records?

- 1 A Yes.
 2 Q When did you write her?
 3 A June, July.
 4 Q June and July of 2010?
 5 A '10.
 6 Q Did you ever receive a response from her --
 7 A No.
 8 Q -- with respect to those records?
 9 A No.
 10 Q You're involved in this lawsuit at this time,
 11 correct?
 12 A Yes.
 13 Q Did you request those records during the
 14 pendency of the lawsuit?
 15 A No. It was prior to the lawsuit.
 16 Q So you didn't request them in the lawsuit,
 17 correct? It's not part of the property that is
 18 missing?
 19 A No. They were gone by the time this stuff was
 20 stolen from my house.
 21 Q Who's Antonia Early?
 22 A A friend.
 23 Q Is she a fiancee?
 24 A Sometimes.
 25 Q Sometimes she is? What does that mean?

- 1 A When we're getting along.
 2 Q Okay. Have you given her a ring?
 3 A No.
 4 Q Do you own any jewelry?
 5 A A watch.
 6 Q What kind of watch do you have?
 7 A Citizens.
 8 Q How much did you pay for it?
 9 A I have no idea. They left this one.
 10 Q Can you describe the watch for me?
 11 A It's a Citizens.
 12 Q Is it a gold band?
 13 A (Indicating.)
 14 Q It looks like a gold and silver band. Would
 15 you agree with that, sir?
 16 A Yeah.
 17 Q Do you know how much you paid for that?
 18 A A hundred bucks I believe.
 19 Q Does it work?
 20 A Yes.
 21 Q How long have you had it?
 22 A I bought this in 2005 when I came home and
 23 didn't have any of my other watches.
 24 Q So you didn't have the other watches in 2005.
 25 When did you get them between 2005 and the time

- 1 you filed that you came home and discovered
 2 they were gone from the Penfield property?
 3 A I got them later, like November, December of
 4 2005.
 5 Q After your bankruptcy?
 6 A Yeah.
 7 Q Do you know when you got your bankruptcy
 8 discharged?
 9 A No.
 10 Q When you say you got them in November or
 11 December 2005, does that mean you got
 12 possession of them or you bought them?
 13 A The ones that I didn't know where they were, I
 14 got possession of them.
 15 Q And how many was that?
 16 A I don't remember offhand.
 17 Q Two?
 18 A I don't remember offhand.
 19 Q Three?
 20 A I don't remember offhand.
 21 Q Well, how many total were there, watches that
 22 were missing?
 23 A It's in the police report. I don't remember
 24 offhand.
 25 Q Was it more than ten?

- 1 A It's in the police report. I don't remember
 2 offhand.
 3 Q Did you provide receipts to the police for any
 4 of these?
 5 A As I testified, the receipts for everything
 6 were destroyed when the water damage destroyed
 7 my home.
 8 Q So your answer is no.
 9 Did you provide an address to the police
 10 of Julius Resnick where you purchased these
 11 watches from?
 12 A They weren't all purchased from Julius Resnick.
 13 Q Well, I didn't say that they were. I'm just
 14 asking, did you provide an address for Julius
 15 Resnick?
 16 A I couldn't 'cause I didn't have an address for
 17 him.
 18 Q You didn't have an address. Did you have a
 19 phone number for him?
 20 A No.
 21 Q Did you ever go to his office?
 22 A When?
 23 Q At any time between 2005 and the time these
 24 watches were taken from your home or that you
 25 claim they were taken from your home.

- 1 A If I recall, he came to my office. I can't
2 remember.
- 3 Q So your testimony would be you never went to
4 his office, he came to yours?
- 5 A No. My testimony is I can't remember.
- 6 Q Well, fair enough. I don't want to
7 mischaracterize it. I want it to be clear,
8 sir.
- 9 A I'm clear.
- 10 Q Okay. You don't even know where his office is
11 located?
- 12 A As of today, no.
- 13 Q Where was it in 2006?
- 14 A The last office I knew of Julius was at
15 Howard's -- no, no, no, no. At the car dealer,
16 Ganley, but he's not there anymore, 'cause when
17 I tried to find him, they said he wasn't there
18 anymore.
- 19 Q So he worked for the car dealer?
- 20 A That's the last place I saw him.
- 21 Q This was Ganley of Bedford, right?
- 22 A Yeah.
- 23 Q How did you pay for those watches when you
24 purchased them from Mr. Resnick?
- 25 A I don't remember.

- 1 Q Did you pay cash?
- 2 A I don't remember.
- 3 Q Did you use a check?
- 4 A If -- you have the transcript there from the
5 last deposition.
- 6 Q I'm asking you, sir.
- 7 A I don't remember.
- 8 Q You don't remember.
- 9 Are you involved in any other litigation
10 other than what we've discussed?
- 11 A Yes.
- 12 Q Could you tell me what litigation you're
13 involved in?
- 14 A H&M Landscaping.
- 15 Q Do they have a judgment against you?
- 16 A Yes.
- 17 Q And what does that relate to, sir?
- 18 A Some work they claim they did that they didn't
19 do.
- 20 Q And how much is the judgment for?
- 21 A I don't remember.
- 22 Q Has anything else happened with respect to that
23 judgment? Have they tried to execute on it to
24 your knowledge?
- 25 A The last thing I got on it is they claim

- 1 something against the LLC. I don't know what
2 it is. I never got a copy of it. I just saw
3 it on the docket. I never got a motion when
4 they filed it.
- 5 Q Well, did the LLCs do business with H&M
6 Landscaping?
- 7 A Brown & Associates did.
- 8 Q Brown & Associates?
- 9 A B. Andrew Brown & Associates.
- 10 Q B. Andrew Brown & Associates.
- 11 A But you said you were referring to it as Brown.
- 12 Q Yes. B. Andrew Brown I think is what I was
13 referring to today.
- 14 A Oh, okay.
- 15 Q That's okay.
- 16 So B. Andrew Brown did business with H&M
17 Landscaping?
- 18 A Yes.
- 19 Q They got a judgment against them. Was this for
20 work done at Penfield?
- 21 A Purportedly for work done.
- 22 Q Again, I don't know if it's true or not, but
23 they say it's for work at Penfield, right?
- 24 A Yes.
- 25 Q That's what their claim was. They got a

- 1 judgment and you said you got something against
2 B. Andrew Brown and your interests --
- 3 A The judgement is against me.
- 4 Q The judgement's against you personally?
- 5 A Yes.
- 6 Q Not against B. Andrew Brown?
- 7 A Right.
- 8 Q And you got something from them relating to
9 your interest in B. Andrew Brown. Would that
10 be a charging order? Do you know what that is?
- 11 A I have no idea what it is.
- 12 Q It sounds to me like that's what it is.
13 Do you know who is pursuing that?
- 14 A Scott Weltman.
- 15 Q Are you involved in any other litigation?
- 16 A Not that I can recall.
- 17 Q Did you bring a lawsuit against the Ohio
18 Supreme Court?
- 19 A Oh, yes, yes.
- 20 Q Can you tell me about that? Where was that
21 lawsuit brought?
- 22 A It's now in the Sixth Circuit, United States
23 Court of Appeals for the Sixth Circuit.
- 24 Q So would that mean you brought it in the United
25 States District Court?

- 1 A Yes.
 2 Q Northern Ohio?
 3 A Yes.
 4 Q Or Southern Ohio?
 5 A Northern.
 6 Q Northern Ohio. And it's in the Court of
 7 Appeals. I assume that means you got an
 8 unfavorable decision from the lower court.
 9 A Yes. Yes.
 10 Q What happened? Did you have a trial? Did you
 11 have a --
 12 A No.
 13 Q Was the case dismissed?
 14 A Yes.
 15 Q In that case, did you represent to the Court
 16 that you didn't have any income?
 17 A I told them what my income was.
 18 Q And what did you tell them?
 19 A I don't remember at this time.
 20 Q Did you ask to file in forma pauperis?
 21 A Yes.
 22 Q And you were allowed to do that?
 23 A Yes.
 24 Q Because of what you told them about your
 25 income?

- 1 A I don't know.
 2 Q What arrangements are you going to be able to
 3 make with respect to the obligation that you
 4 owe the Ohio Supreme Court?
 5 A What do you mean?
 6 Q How are you going to pay it?
 7 A When I get some money.
 8 Q And when are you going to get money?
 9 A I hope to get money every day.
 10 Q From working, right?
 11 A Yes.
 12 Q The property on Penfield has extensive damage
 13 to the interior; does it not?
 14 A Yes.
 15 Q And it's being foreclosed on; is that correct?
 16 A Yes.
 17 Q Is the value of the property now with the
 18 extensive damage less than the amount that is
 19 currently owed on the mortgage?
 20 A Yes.
 21 Q Are you trying to delay the foreclosure on the
 22 property?
 23 A No.
 24 Q Did you file an answer in that case?
 25 A Yes.

- 1 Q Did you deny the allegations in the complaint
 2 in your answer?
 3 A Yes.
 4 Q Did someone file an answer for B. Andrew Brown?
 5 A No.
 6 Q Why were you named in that lawsuit for the
 7 foreclosure if you don't own the property?
 8 A You have to ask the people that filed it.
 9 Q Were you on the mortgage?
 10 A Yes.
 11 Q This is your mortgage? B. Andrew Brown's not
 12 on the mortgage?
 13 A No.
 14 Q It's your mortgage. That's probably why you're
 15 not named. I answered my question.
 16 A I'm sorry?
 17 Q I said I think I answered my own question.
 18 Do you have any interest in any other
 19 real property?
 20 A No.
 21 Q Does B. Andrew Brown have any interest in any
 22 other real property?
 23 A No.
 24 Q Do any of the entities that we discussed today
 25 to which you're affiliated have an interest in

- 1 any other real property?
 2 A No.
 3 Q Other than the motor vehicles that we discussed
 4 today, do you own any other motor vehicles?
 5 A No.
 6 Q Does B. Andrew Brown own any other motor
 7 vehicles?
 8 A No.
 9 Q Do any of the other entities own any other
 10 motor vehicles?
 11 A No.
 12 Q I think I don't have anymore questions for you,
 13 but what I would like, sir, is to get your
 14 acknowledgment that you will provide to me the
 15 Certificate Memorandum of Titles for those
 16 vehicles --
 17 A I acknowledge that.
 18 Q -- and the other documents which you have that
 19 I requested in the duces tecum.
 20 A I don't have anymore.
 21 Q Well, I'm sure you can get them from your bank.
 22 A Which ones? Oh, you mean the ones from Chase?
 23 Q The bank account statement from Chase.
 24 A Yes.
 25 Q Any other bank accounts you've had for the

1 period, you can request them from your bank and
 2 provide those to me. Okay?
 3 A One second. Okay.
 4 Q What is the best address for me to contact you
 5 at?
 6 A 6075 Penfield Lane.
 7 Q You still receive mail at that address?
 8 A Yes.
 9 Q How frequently do you go to that address?
 10 A Every day.
 11 Q How long is it going to take you to provide
 12 those additional records that we discussed?
 13 A Well, being that I don't have them at the
 14 current time, other than the Memorandum of
 15 Title, I can't tell you. I have to get -- this
 16 says for the liability covering 2008. I don't
 17 have those. I have to get those from the bank.
 18 Q Would 45 days be enough time for you to do
 19 that?
 20 A You're asking me a question that the answer is
 21 not -- I'm not in control of, so I can't say.
 22 Q I understand that.
 23 A I can request them tomorrow.
 24 Q Well, why don't you request them and how about
 25 we do this?

1 A I've been waiting on a canceled check from
 2 Huntington for about 90 days.
 3 Q I will have the Court continue the exam for
 4 60 days to allow you to provide those records,
 5 and then if you can update me as to where you
 6 stand with respect to getting those records.
 7 A Okay.
 8 Q And then if 60 days comes around and you don't
 9 have them, you can at least show me that you've
 10 asked for them and we'll get a time as to when
 11 they can be provided.
 12 A Okay.
 13 Q Okay. You can also ask your ex-wife for them.
 14 Or maybe I will.
 15 I don't have any other questions for you.
 16 A You ask her.
 17 Q I may subpoena them.
 18 I don't have any other questions for you.
 19 You have the ability if you would like to read
 20 the transcript.
 21 A Yes.
 22 Q You're welcome to do so, but it's not
 23 technically going to be used in litigation
 24 since there's already a judgment against you.
 25 And you're free to go, sir.

1 A Thank you.
 2 Do you want me to get you documents as I
 3 get them or do you want me to wait till I have
 4 them all?
 5 Q Whatever you have, I would prefer that you send
 6 it to me and let me know what else you're
 7 waiting on.
 8 A Okay. Now, the B. Andrew Brown & Associates,
 9 I've probably --
 10 THE REPORTER: Are we still
 11 going off or are we on?
 12 Q Well, what's the problem? Why don't we go back
 13 on? You can tell me.
 14 A I've already requested those, so I'll probably
 15 have those quicker than the others.
 16 Q Well, as soon as you get them, please provide
 17 them to me, and, as I said, I'm going to
 18 continue the exam for 60 days based on you
 19 appearing today and your representation that
 20 you will provide those additional records that
 21 we requested.
 22 MR. BERNEY: Thank you,
 23 sir.
 24 THE WITNESS: Thank you.
 25 (The deposition concluded at 12:01 p.m.)

THE STATE OF OHIO,) SS:
 COUNTY OF CUYAHOGA.)

I, Elaine S. Newlin, a Notary Public within and for the State of Ohio, duly commissioned and qualified, do hereby certify that BRUCE A. BROWN aka AMIR JAMAL TAUWAB was first duly affirmed to testify the truth, the whole truth and nothing but the truth in the cause aforesaid; that the testimony then given by him was by me reduced to stenotypy in the presence of said witness, afterwards transcribed on a computer/printer, and that the foregoing is a true and correct transcript of the testimony so given by him as aforesaid.

I do further certify that this deposition was taken at the time and place in the foregoing caption specified. I do further certify that I am not a relative, counsel or attorney of either party, or otherwise interested in the event of this action.

IN WITNESS WHEREOF, I have hereunto set my hand and affixed my seal of office at Cleveland, Ohio, on this 24th day of March, 2011.

Elaine S. Newlin, Notary Public
 Within and for the State of Ohio.
 My Commission expires August 22, 2015

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