

IN THE CIRCUIT COURT OF THE SIXTH JUDICIAL CIRCUIT
IN AND FOR PINELLAS COUNTY, FLORIDA

CASE NO.: 15-003375-FD

██████████

Petitioner/Husband,

vs.

██████████,

Respondent/Wife.

: : : : : : : : : : : :

DEPONENT:

██████████

DATE:

October 14, 2015

TIME:

9:00 a.m. - 12:00 p.m.

LOCATION:

Parliamentary Reporting
Summit Executive Suites
15375 58th Street North
Clearwater, FL

REPORTER:

Sharon Ruby
Notary Public
State of Florida at Large

A P P E A R A N C E S:

For Petitioner/Husband: JOHN S. THACKER, ESQ.
Thacker Law Group, P.A.
407 South Ewing Avenue
Clearwater, FL 33756

For Respondent/Wife: CHRISTIAN DENMON, ESQ.
Denmon & Denmon
1560 W. Cleveland Street
Tampa, FL 33606

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Direct Examination by Mr. Denmon

3

1 [REDACTED]
2 WAS CALLED AND AFTER BEING DULY SWORN WAS EXAMINED AND
3 TESTIFIED AS FOLLOWS:

4 DIRECT EXAMINATION

5 BY MR. DENMON:

6 Q Mr. [REDACTED] how are you doing today?

7 A Fine, thank you.

8 Q My name is Christian Denmon. We've met before
9 briefly at another deposition, a deposition of your wife;
10 is that correct?

11 A Yes, sir.

12 Q Okay. And have you ever had your deposition
13 taken before?

14 A No.

15 Q You've seen one taken before, correct?

16 A Yes.

17 Q Okay. So you understand the deal is that I'm
18 going to ask you questions, right?

19 A Yes.

20 Q And then I'll need you to answer the question as
21 truthfully as you can, correct?

22 A Yes.

23 Q Okay. Your date of birth?

24 A [REDACTED].

25 Q And are you currently employed?

1 A No.

2 Q Are you retired?

3 A Yes.

4 Q When was the last time that you were employed?

5 A I retired out of the military in 2007.

6 Q You mean then that you haven't had any

7 employment since then?

8 A Correct.

9 Q Okay. Are you currently in school?

10 A Yes.

11 Q Okay. And where are you in school?

12 A University of South Florida.

13 Q Okay. Are you taking classes online or in

14 person?

15 A I have the option to do both.

16 Q What are you doing currently?

17 A I go to class, and if I cannot make it I will

18 view it online.

19 Q Okay. Are you taking a full case load right

20 now?

21 A No.

22 Q All right. So you're taking a partial case

23 load?

24 A Yes.

25 Q How many classes are you taking right now?

1 A Two.

2 Q Okay. What are those classes?

3 A The first class is engineering management.

4 Q Okay. And the second class?

5 A It's venture capital and private equity.

6 Q Do you have a major or a minor?

7 A The major that I have is civil engineering.

8 Q Okay. How long have you been seeking a degree
9 in civil engineering?

10 A This degree I believe I started when I moved to
11 this location, and that was either the second semester of
12 2011 or the first semester of 2012.

13 Q Have you been in school since you retired from
14 the military?

15 A When I first retired from the military, no.

16 Q Okay. But eventually you started taking
17 classes, right?

18 A Yes.

19 Q Okay. When was that?

20 A I believe it was a little over six months after
21 I retired.

22 Q Okay. You retired in 2007, right?

23 A Yes.

24 Q Okay. And so when in 2007 did you retire?

25 A In the summer.

1 Q Okay. So somewhere around the beginning of 2008
2 is when you started taking classes; is that right?

3 A Yes.

4 Q Okay. And have you been enrolled in taking
5 classes ever since then?

6 A Not continuously.

7 Q When did you have breaks?

8 A I had to take a semester off after my wife had a
9 really bad injury giving birth to our youngest child. She
10 was unable to take care of herself or the family, and we
11 had to have help from many people and I had to take a
12 semester off.

13 Q Any other lapses in your education?

14 A I don't know for sure if I can call them lapses,
15 but I believe not, but I don't know for sure.

16 Q Okay. Do you have any degrees from this
17 additional schooling after you retired?

18 A Yes.

19 Q Okay. What are your degrees in?

20 A I got a Bachelor's in civil engineering.

21 Q And when was that?

22 A It was December of 2011.

23 Q Are you currently seeking a Master's in civil
24 engineering?

25 A Yes.

1 Q Do you have an expected graduation date?

2 A Yes. I'm trying to graduate this semester.

3 Q When you say trying, that suggests then perhaps
4 you're not going to graduate this semester.

5 A It's too early to determine if I'm going to meet
6 all the requirements.

7 Q You mean for the semester that you're currently
8 involved in?

9 A They have a rigorous review process before they
10 award you the degree. I have to go before a board. They
11 have to review the work I did.

12 Q When is that? Do you know?

13 A Sometime this semester.

14 Q And should you graduate this year what are your
15 plans for 2016?

16 A Well, I really don't know. That depends on
17 what's going to happen with the current divorce situation
18 and the custody of the kids.

19 Q So what do you mean?

20 A I don't know. It depends on what's going to
21 happen with the family situation.

22 Q You mean how many overnights you end up with the
23 children?

24 A That is one factor, yes.

25 Q What are the other factors?

1 A Well, I'm not sure what the other factors are,
2 but that's the primary one.

3 Q What's the time sharing that you're seeking?

4 A I want to get as much time as I can get.

5 Q Do you have any specifics about that?

6 A I want to get as much time as I can get with the
7 kids.

8 Q If you had your way and you went in front of the
9 judge asking for as much time as you can, what would that
10 mean specifically?

11 A Well, isn't that up to the judge to decide?

12 Q Yeah, but what do you want?

13 A That's what I'm saying, I want as much time as I
14 can get with the kids.

15 Q And if you get what you want, how will that
16 affect your future employment?

17 A I really don't know.

18 Q Okay. If you don't get much time with the
19 children, how will that affect what you're going to do
20 come 2016?

21 MR. THACKER: I'll object to the form.

22 Go ahead and answer as best you can.

23 A Once again it's too early to tell. I don't
24 know.

25 Q Okay. Do you get a stipend from the Government

1 for attending school?

2 A I do.

3 Q What is the amount that you get from the
4 Government for attending school?

5 A Well, it varies depending on the course load
6 that you take.

7 Q Okay. Right now you're taking two classes,
8 right?

9 A Right.

10 Q What do you get on a monthly basis right now
11 from the Government?

12 A Well, I'm probably going to have to refer to my
13 financial affidavit to give you an exact number. I forgot
14 my glasses.

15 MR. THACKER: He needs his glasses. Can we go
16 off the record for a minute?

17 MR. DENMON: Of course.

18 (Whereupon, a break was taken.)

19 Q It doesn't appear that you have it listed with a
20 value on your financial affidavit, does it?

21 A Actually you're correct, because I think what
22 was relayed was the fact that since it was considered part
23 of school and nontaxable that it wouldn't be part of my
24 declaration.

25 Q And by relayed what do you mean by that? When

1 you were working on your financial affidavit, your
2 understanding is that it wasn't to be included on your
3 financial affidavit, the amount?

4 A That is correct.

5 Q Okay. You don't know the exact number that you
6 get on a monthly basis right now?

7 A No, but I can give a rough estimate.

8 Q What's your rough estimate?

9 A It's around -- if I'm going like I am, which is
10 considered two classes, that's two-third of graduate
11 full-time, it's around a thousand.

12 Q Okay.

13 A And it only counts for when school is in
14 session. So any day school is not in session it doesn't
15 count. So I don't get paid over breaks, over summer.

16 Q And when you say a thousand, you mean a thousand
17 for the semester or a thousand a month?

18 A A month.

19 Q Okay.

20 A And that's, you know, to cover the costs that
21 you would -- additional costs for school and it's supposed
22 to help a little with your housing.

23 Q Okay. And so if you turn to page three of your
24 financial affidavit and you go to line 27 where it says
25 present net monthly income, it's near the top --

1 A Uh-huh.

2 Q -- it appears you put in some bold letters with
3 an asterisk that you receive a stipend for any month
4 you're enrolled as a full-time student.

5 A Okay, yeah.

6 Q That is not exactly true. You get a stipend if
7 you're a part-time student as well, right?

8 A Well, you have to be -- you have to be over half
9 time in order to get anything. If I took one class, I
10 would not get a stipend.

11 Q Okay. Have you taken one class in any of the
12 last eight years that you've been in school?

13 A I'm not sure, but off the top of my head I would
14 say, no, I've always taken at least two.

15 Q Do you anticipate you're going to go back into
16 the workforce?

17 A At this point in time I'm not sure what to
18 expect.

19 Q Okay.

20 A Whatever the family situation dictates.

21 Q So your decision whether or not to go back into
22 the workforce will be based on your family --

23 A Yes.

24 Q -- decisions? Okay. Are you currently being
25 treated by a doctor for any physical ailments?

1 A I'm not sure what you mean by being treated.

2 Q Do you have a doctor?

3 A Yes, I have a doctor.

4 Q Okay. Do you see a doctor for anything in
5 particular?

6 A I have a primary care monitor at MacDill Air
7 Force Base, and she refers me to doctors on an as needed
8 basis.

9 Q Has she referred you to any mental health
10 counselors or doctors?

11 A No.

12 Q Are you currently on any medication?

13 A Yes.

14 Q Okay. What are you currently on medication for?

15 A I'm on medication for low thyroid.

16 Q Okay.

17 A And then I take a medication for allergies and
18 medication for low testosterone and for -- I don't know
19 how you say this -- reflux, you know.

20 Q Okay. Have you ever been diagnosed with any
21 mental health disorders?

22 A Never.

23 Q Okay. Do you take any medication to help you
24 with your mental health for depression or anything like
25 that?

1 A No.

2 Q Are you currently in any personal therapy?

3 A No.

4 Q Okay.

5 A Therapy? Could you be more specific, please.

6 Q Would you say that you're currently in any
7 treatment or any therapy with any psychologist or any
8 doctor like that?

9 A No. However, we are currently having a custody
10 evaluation by Dr. [REDACTED] I'm not sure if that would
11 qualify.

12 Q Okay. During the marriage who handled the
13 finances?

14 A Well, we had an agreement on everything and --

15 Q What was the agreement?

16 A Well, most of the stuff I would handle and she
17 would -- you know, she'd have her finances, too. You
18 know, she'd do shopping and contribute to the decisions,
19 you know, financial decisions. She had access to
20 everything. There was no secrets.

21 Q Okay. So during the marriage you said most of
22 the financial stuff you would handle; is that right?

23 A Yes. I would pay bills. I would -- investments
24 after consulting with my wife.

25 Q Okay. You had an arrangement where you said

1 that you would handle the bills and the money and that she
2 would handle the kids, correct?

3 A No, that is incorrect.

4 Q Okay. So it wasn't her responsibility to handle
5 the children during the marriage?

6 A No. She would help.

7 Q She would help you?

8 A It was a cooperative effort. Anything that
9 needed to be done for the better of the family, you know,
10 one of us would pick it up.

11 Q Okay. When you guys were still in the same
12 house together, who took the kids to school in the
13 morning?

14 A What time frame are you talking about?

15 Q The last year that you guys were together.

16 A Okay. The last year. So that would be
17 April 2014 to April 2015. Okay. She took them the
18 majority of the time to school.

19 Q Okay. Who would pick the kids up from school?

20 A Well, again, we would have help sometimes. I
21 believe [REDACTED] [REDACTED] helped pick up the kids; my
22 mother, [REDACTED] [REDACTED] my father, [REDACTED] [REDACTED] myself.

23 Q Who picked up the kids most of the time?

24 A Most of the time it would be my wife.

25 Q Okay. Who did the grocery shopping for the

1 household?

2 A We both did.

3 Q Okay. Did you guys share in that duty equally,
4 or did your wife do it most of the time?

5 A It varied for what the need was. If I was in
6 Tampa and she was busy doing something else, I would take
7 care of it. If she was going there, then she would take
8 care of it, because we would go to the base to get lower
9 prices on groceries.

10 Q When you say when you were in Tampa, because you
11 were at school?

12 A Yes.

13 Q Okay. And if you were taking a full-time load,
14 were you at school every day of the week?

15 A No.

16 Q Okay. Were you at school three days a week?

17 A Sometimes, yes.

18 Q Okay. You mentioned your parents. They would
19 help with picking up the children --

20 A Yes.

21 Q -- is that right? How often did they do that
22 during the last year of the intact marriage?

23 A Well, not often because my wife all of a sudden
24 did not want my kids to associate with my parents, their
25 grandparents. She tried to cut them out of their lives.

1 Q Well, you just mentioned them as picking up the
2 kids. So if it's not often --

3 A That's right, it wasn't often.

4 Q And how often is not often?

5 A I cannot put an exact number on it. I would
6 have to do research.

7 Q Is it less than five?

8 A There were situations when neither one of us
9 could pick them up, so my parents did it.

10 Q Okay. Was it less than five?

11 A Again, I would have to research it.

12 Q Okay. Can you tell me if it was more than once
13 in the last year?

14 A Again, I know they did it once for sure.

15 Q What about the year before?

16 A Well, the year before was similar to the year
17 that you mentioned before the separation.

18 Q Okay. So we're talking what, 2013 to 2014?

19 A Yeah, it was a period of two years where she
20 tried to isolate my kids from their grandparents.

21 Q Why do you think that happened?

22 A I don't know for sure, but some of the theories
23 are my wife has a traumatic brain injury and she does not
24 take the medicine as prescribed. I think her thinking is
25 clouded.

1 Q How is your relationship with your oldest child?

2 A My relationship with my oldest child is great up
3 unto --

4 Q How is it right now?

5 A Now?

6 Q Yes.

7 A He avoids speaking to me.

8 Q Okay. When did that start happening?

9 A I really don't have an exact date. I think it
10 was -- it coincides with the separation.

11 Q Okay. Does it coincide with you getting into a
12 physical altercation with him?

13 A No.

14 Q Did you get into a physical altercation with
15 your son?

16 A As far as physical altercation goes, there is --
17 I'm not sure exactly what you're trying to get at.

18 Q Did you hit your son?

19 MR. THACKER: Objection. Don't answer it.

20 Q Have you ever hit any of your children?

21 MR. THACKER: Wait, wait, wait, wait. There is
22 only three children now, three minor children. So is
23 your question directed just to the three minor
24 children or all four of his children? Just so that
25 I'm clear.

1 Q Have you ever hit any of your four children?

2 MR. THACKER: I'm going to object and instruct
3 him to invoke the Fifth Amendment. Don't answer.

4 Q Do you believe in corporal punishment?

5 A Well, it's funny that you mention that to me,
6 because I was informed by a police officer that a parent
7 can use corporal punishment until a child is 18 years old.

8 Q Do you believe in corporal punishment?

9 A There are times when children probably should
10 get a little spanking, so yes.

11 Q When is the last time that you spanked one of
12 your children?

13 A I can't remember. It's been a long time.

14 Q Okay. Have you spanked any of your children?

15 A Yes.

16 Q Have you poked [REDACTED] before in the chest and
17 pushed him around?

18 A No.

19 MR. THACKER: Object.

20 Q Have you called your children stupid punks
21 before?

22 A The way you phrased that, no.

23 Q Have you used derogatory terms like stupid punk
24 to your children before?

25 MR. THACKER: Object to the form.

1 Answer as best you can.

2 A Okay. With the way that my oldest son was
3 acting, I did tell him once that he was acting like a
4 punk.

5 Q Okay. When was that?

6 A I don't know the exact date.

7 Q Have you called your children dumbass before?

8 A I can't recall.

9 Q Have you called your children idiots before?

10 A I can't recall. I correct them if they even
11 bring it up.

12 Q Have you called your children pieces of shit
13 before?

14 A Again, I don't think I'd ever say something like
15 that.

16 Q Okay. But you're not sure?

17 A I know for a fact my three youngest, no.

18 Q Potentially the oldest; is that right?

19 A The oldest is very problematic lately since he
20 has stopped taking his ADHD medicines. He has been
21 defiant. He has been unable to control his impulses.

22 Q So you're saying that your oldest has a
23 psychological problem?

24 A Yes. I'm concerned about him and concerned
25 about the other children being around him.

1 Q A problem that causes him to take medicine?

2 A He has been on ADHD medicines for over ten
3 years.

4 Q Okay. And your response to him being off
5 medicine is to call him stupid punk, idiot, dumbass or
6 piece of shit?

7 MR. THACKER: Objection to form.

8 Answer as best you can.

9 A No, that is not my response.

10 Q Your response is to get physically violent with
11 him?

12 A No, that is not my response.

13 Q Do you use physical violence to control people
14 if you can't get them to do what you want?

15 A No.

16 Q Have you ever used physical violence against
17 your wife?

18 A No.

19 Q Your wife hasn't gone to the emergency room in
20 late 2013 because you stepped on her chest?

21 MR. THACKER: Object to the form.

22 Answer as best you can.

23 A I never stepped on her chest.

24 Q Okay. Did you physically assault your wife in
25 late 2013 causing her to take a trip to the emergency

1 room?

2 MR. THACKER: Object to the form.

3 Answer as best you can.

4 A No, I never hurt my wife.

5 Q Did you force yourself sexually atop your wife
6 in February of 2015?

7 A No.

8 Q You never sexually assaulted your wife?

9 A No.

10 Q Are you taking Viagra?

11 A No.

12 Q Cialis?

13 A At times.

14 Q Okay. You didn't mention that when we were
15 talking about your scripts. Anything else that you didn't
16 mention?

17 A No, I did mention it. That is a low T
18 prescription. I did mention it. I didn't give specific
19 names of the medications.

20 Q Okay. So for your low testosterone you take
21 Cialis; is that correct?

22 A Yes.

23 Q Are you also taking the hormone testosterone?

24 A Yes.

25 Q Okay. Are there any other hormones that you're

1 taking for your low T?

2 A Oh, wait. I need to correct that.

3 Q Okay.

4 A There was a time when I was given a medicine for
5 an estrogen spike.

6 Q When was that?

7 A I'm not sure, but it was -- you know, there are
8 some theories about it. My wife who's got a prescription
9 for estrogen cream, Premarin, might have had an effect
10 upon it.

11 Q Might have affected your estrogen level?

12 A Might have caused a spike in my laboratories.

13 Q Okay. How often do you get your hormonal
14 profile done by a doctor?

15 A Whenever the doctor orders it.

16 Q Okay. Does it happen a lot?

17 A I'm not sure what you mean by a lot.

18 Q When is the last time it happened?

19 A Probably over six months ago.

20 Q Okay. When was the last time --

21 A But I'm not exactly sure of the date.

22 Q Okay. Sometime over six months ago, correct?

23 A Something like that.

24 Q When was the last time it happened before that?

25 A Once again I'd probably have to refer to the

1 medical records.

2 Q Okay. Have you ever punched your wife in the
3 mouth?

4 A No.

5 Q Have you ever caused her to have a bloody lip?

6 A No.

7 Q You never caused her to have a bloody lip that
8 also caused her to go to the doctor's?

9 A No.

10 Q Okay.

11 A Let me say something.

12 Q Sure.

13 A My wife does have a problem with bruxism, and
14 this can be validated by Dr. [REDACTED] the family dentist.
15 She has to wear a mouthpiece at night in her mouth.

16 Q Okay. Are you suggesting then if your wife had
17 a bloody lip that caused her to go to the hospital that it
18 was associated with the bruxism?

19 A I'm not suggesting -- what I'm suggesting is she
20 puts some mouthpiece in her mouth every night.

21 Q Okay.

22 A And she has this thing where she's got
23 uncontrollable grinding of her teeth while she's sleeping.
24 That's bruxism. I had to look it up. I asked her over
25 and again why are you wearing a mouthpiece every night,

1 and that is most likely another symptom of her brain
2 injury.

3 Q Okay. And how is that related to my question
4 about whether or not you punched her in the mouth?

5 A I never did.

6 Q Okay. Did your wife go to the emergency room in
7 late 2013?

8 A I do not know.

9 Q Were you living with your wife in late 2013?

10 A Yes.

11 Q And you can't remember if she went to the
12 emergency room or not?

13 A I took her to the emergency room once in 2013.

14 Q Okay. Why?

15 A She had trouble breathing. I believe it was in
16 May of 2013.

17 Q Okay. Do you know why she had trouble
18 breathing?

19 A I think the final diagnosis was something like
20 pleurisy.

21 Q It was not related to anything physical that you
22 did to her?

23 A No.

24 Q How old is [REDACTED] now?

25 A Eighteen.

1 Q Has [REDACTED] ever walked in on you naked in front of
2 your computer looking at pornography?

3 A No.

4 Q Did you have to take [REDACTED] to court for a
5 deposition before?

6 A Yes.

7 Q What happened with that? How did you guys end
8 up in court for a deposition?

9 A Okay. He walked in on a pool boy inside the
10 house who was playing with my wife's underwear, and from
11 what I gather he actually took a piece with him. And when
12 my son walked in on him he went to his room. And that's
13 why he was subject to a deposition.

14 Q When your son walked in on the pool boy, your
15 son then walked into his room?

16 A That's what he states.

17 Q Okay. So this pool boy, he was in trouble for a
18 break-in; is that right?

19 A Yes.

20 Q Okay. And so you had to go in front of the
21 judge based on that; is that right?

22 A Actually, no, I didn't have to go in front of a
23 judge based upon a break-in. That's your question,
24 correct?

25 Q Yes. Did you have to go in front of a judge?

1 A Yes.

2 Q Why?

3 A When I went to take my son for a deposition the
4 lawyer wanted to question him alone and he was still a
5 minor. So I turned around and asked the person, the
6 lawyer who was appointed to us by the Government, is this
7 a proper process, can they take my son who is a minor.

8 And, anyways, while I'm asking the guy the
9 question, the defense attorney for the person who broke in
10 the home left. Then he turns around and says that I
11 obstructed his ability to take questions from my son. So
12 I got a notice to show. I think that's the correct term.

13 MR. THACKER: Just answer as best you can.

14 A A notice to show and -- anyways, when I showed
15 up the lawyer basically stated that he was wrong in the
16 procedures that he was about to undertake; he should have
17 had a video surveillance there; and there was also
18 supposed to be a representative that would accompany my
19 son doing the questioning. That stuff wasn't in place, so
20 it was dropped.

21 Q This was in 2012?

22 A I'm not sure actually. It was -- it was when I
23 first -- I'm not sure of the exact dates because it got
24 drug out from when it happened and when there was actual
25 court times. I'd have to refer to documents.

1 Q Was this in Pinellas County, Florida?

2 A Yes, it was.

3 Q Okay. Do you remember the last name of the
4 Defendant in the case?

5 A It was [REDACTED]

6 Q [REDACTED]?

7 A That sounds about right.

8 Q Do you remember the first name of the Defendant
9 in the case?

10 A I think it was [REDACTED]

11 Q Is [REDACTED] currently on any medicine?

12 A Yes.

13 Q What kind of medicine?

14 A Well, he's taking a Vitamin D cream, a multi
15 vitamin, and then he's on something called Cellcept, which
16 is an immunosuppressant drug. And he's also supposed to
17 receive light treatments, ultraviolet, on the areas that
18 are affected, his scalp and face.

19 Q What is the medical condition that [REDACTED] has?

20 A He has an autoimmune disorder, which the
21 technical term is called Morphea En Coup de Sabre.

22 Q Who is his treating doctor?

23 A Dr. [REDACTED] [REDACTED]

24 Q Is Dr. [REDACTED] [REDACTED] his pediatrician or a
25 specialist?

1 A She's a specialist in dermatology.

2 Q How often does ■ need to take that medicine,
3 that Cellcept?

4 A The current regime is two times a day.

5 Q Do you make sure that ■ gets his Cellcept?

6 A Oh, I do.

7 Q Have you told him that it's his responsibility
8 to take his medicine and not your responsibility to make
9 sure he takes it?

10 A I try to have him take responsibility for
11 everything he does. However, I verify every time whether
12 he takes it or not.

13 Q So he takes it every time?

14 A I'm not saying he takes it every time. There
15 has been times ever since he's been on the medication that
16 he hasn't taken it every time, and this goes back to the
17 Methotrexate that he was prescribed, too. So of course
18 you're going to miss a dose if you have -- if you're
19 required to take two doses a day.

20 Q Did he miss doses when you guys were in Key West
21 earlier this year?

22 A I am not sure if he missed a dose. I know he
23 took the medications. I had a problem. My wife seems to
24 count out medicines for the bottle. She takes medicines
25 in and out of the bottle. So it was hard to determine if

1 she put in the right number or not. I don't know what
2 she's doing with the other medicines, but the medicine
3 should stay in the bottle when there -- when it's
4 prescribed and it should be, you know, administered out of
5 that bottle. As far as -- I have a problem with her
6 giving me a bottle that has only two pills when she drops
7 him off.

8 Q So you don't know if he took all of his doses --

9 A For the Friday night because -- anyways --

10 Q When you were in Key West you have no idea if he
11 took all the medicine he was supposed to take?

12 A I know he took medicine every day when we were
13 there.

14 Q How old is [REDACTED]

15 A [REDACTED] is now nine years old.

16 Q Have you thought about taking any classes for
17 domestic violence?

18 MR. THACKER: Object to the form.

19 Answer as best you can.

20 A No.

21 Q Do you think there is anything that maybe you
22 need some help with in regards to anger management?

23 A No.

24 Q Okay. How are the other children doing?

25 A Well, the other children are having problems

1 with the divorce. The three youngest is what you're
2 referring to?

3 Q Uh-huh.

4 A Each one of them exhibits different behaviors
5 that I did not observe while I was living in the home.

6 Q Do you think that any of them have issues that
7 need to be helped with counseling?

8 A Yes.

9 Q Okay. All the children?

10 A All three, yes.

11 Q Okay.

12 A The divorce is difficult. It was relayed to me
13 that it's more difficult on the kids than you can imagine.
14 So, yes, I would like to get help for them.

15 Q Do you think [REDACTED] should be in counseling as
16 well?

17 A Yes.

18 Q Okay. Do you think [REDACTED] should be in counseling,
19 the oldest?

20 A Yes.

21 Q Do you think you should be in counseling?

22 A No.

23 Q Do you think your parents think or do you think
24 your children think that you're a good dad?

25 A Yes.

1 MR. THACKER: Object to the form.

2 Answer as best you can. You just answered?

3 THE DEPONENT: Yes.

4 Q Do you think if they were asked they would say
5 you're a good dad?

6 MR. THACKER: Same objection.

7 Answer as best you can.

8 A Yes.

9 Q Do you think that you're a good dad?

10 A Yes.

11 Q Do you think my client, [REDACTED] is a good mom?

12 A No.

13 Q Okay. Have you always thought that she's not a
14 good mom?

15 A No.

16 Q Why do you think she's not a good mom?

17 A I think something is happening to her. She
18 doesn't have the ability to process things properly and I
19 think it's related to her brain damage.

20 Q Okay. When did you start thinking this?

21 MR. THACKER: For the record I want to make sure
22 he was finished with his prior answer. I think he
23 had some things -- I'm not suggesting he does, but
24 were you finished, [REDACTED]

25 THE DEPONENT: Well, no, I wasn't.

1 MR. THACKER: Okay. Then can he finish his
2 answer before you ask another question?

3 MR. DENMON: Yes.

4 A I'm trying to remember where I left off now. As
5 far as she -- she has done things that have me concerned.

6 Q When was the last time that she did something
7 that had you concerned?

8 A Okay. Last week she did not give me permission
9 to take my kids to see a child psychologist.

10 Q You guys are having an issue trying to get an
11 agreed upon psychologist; is that right?

12 A That is no longer an issue. We have an agreed
13 upon child psychologist.

14 Q Okay. So what was the problem last week?

15 A I wanted to pick my son up after school and she
16 informed me that I needed to cancel the appointment.

17 Q Okay. What day did you want to pick up your kid
18 after school?

19 A Thursday.

20 Q Okay. Do you have time sharing right now with
21 your temporary time sharing plan on Thursday?

22 A The plan allows for her to agree to any time of
23 the week as needed.

24 Q Okay. What's the time that you have regardless
25 of whether or not she agrees or not?

1 A I pick them up after school Friday --

2 Q Uh-huh.

3 A -- and I drop them off Saturday at seven.

4 Q Okay. Thursday you wanted to pick up which
5 child?

6 A [REDACTED]

7 Q Okay. When was the last time that you had asked
8 to pick up [REDACTED] during the week?

9 A I previously asked to have the kids the
10 Thursday -- I'm not sure. It might have been two, three
11 weeks prior -- to pick up all three kids, and [REDACTED] was
12 included, and have them spend the night, Thursday night,
13 and then I would take them to Dr. [REDACTED] office in
14 the morning.

15 Q Okay. And this Thursday that you asked to see
16 [REDACTED] you wanted to pick him up after school, right?

17 A Yes.

18 Q Okay. Did [REDACTED] have an appointment with this
19 psychologist that we're talking about?

20 A I'm not sure if he had appointments. Ever since
21 the separation my wife has taken it upon herself to not
22 inform me of any appointments that are made for my kids,
23 any social events. She has tried to cut me out of their
24 lives in every way possible.

25 Q You're asking to pick up the kids when

1 they're -- when the kids have to go see either
2 Dr. [REDACTED] or they have to see a counselor, correct?

3 A That is not the only time but --

4 Q Well, that's when you want to pick them up,
5 right? --

6 A No. I have --

7 Q -- because you want to be able to be the one
8 that drives them to go see the doctor, right?

9 A Can I speak, please?

10 MR. THACKER: We can't talk over each other.

11 A I have requested multiple --

12 MR. THACKER: Wait a second, [REDACTED]

13 Are you trying to answer a prior question?

14 THE DEPONENT: Okay.

15 MR. THACKER: Answer my question, please, so the
16 record is clear. Are you trying to finish answering
17 the prior question?

18 THE DEPONENT: I was trying to answer a
19 question, yes.

20 MR. THACKER: Can we identify what question he
21 was trying to answer, let him finish and then ask a
22 follow-up? Is that all right?

23 MR. DENMON: Sure.

24 MR. THACKER: What question were you trying to
25 finish answering?

1 THE DEPONENT: It's going to have to be
2 restated.

3 MR. THACKER: Okay. Then why don't we just move
4 on to a new question, okay. Just answer the new
5 question. You have the right to read the errata
6 sheet on this depo if you need to, okay. Is that all
7 right, Chris?

8 MR. DENMON: Yeah.

9 MR. THACKER: Okay.

10 Q You're asking [REDACTED] for extra time to pick up the
11 children because you want to be the parent that drives the
12 kids to the counseling meeting with the doctor, right?

13 A There is an agreement to where we're supposed to
14 have 50/50. I'm trying to honor the agreement to where
15 the parents will take them 50 percent of the time to see
16 each person.

17 Q The yes or no question that I asked you is that
18 you're asking [REDACTED] -- you asked [REDACTED] to pick up the kids
19 during the week so you can be the parent that drives the
20 kids to their -- to either Dr. [REDACTED] or to a
21 counselor; is that right?

22 A Yes, I did ask to pick up the kids to take them
23 to these appointments.

24 Q I see you have a copy of your financial
25 affidavit in front of you; is that right?

1 A Yes.

2 Q Okay. And this is that financial affidavit that
3 you filed with the Court on June -- or notarized on
4 June 18, 2015; is that right? That would be on the second
5 to last page of your affidavit.

6 A Yes.

7 Q Okay. If you could turn to the second page of
8 your affidavit. Number 11, monthly rental income, you
9 have as a negative number. It's negative 872.91.

10 A Yes.

11 Q I know that you've attached this page to the
12 very back of your affidavit. It's titled rental income.

13 A Yes.

14 Q Okay. Who is receiving that monthly rent right
15 now? Is that going to you or is it going to [REDACTED]

16 A It's going to the account that I use to pay the
17 mortgage for the property, and the account is now in my
18 name.

19 Q Is that the Wells Fargo account?

20 A It is.

21 Q Okay. So it's going to you, right?

22 A Yes. I manage the property.

23 Q Okay. The mortgage that you're paying every
24 month is less than the amount of money that you're
25 receiving in rent, correct?

1 A Yes.

2 Q Okay. You have a \$1,035 in repairs that's
3 listed on this little itemization here. How did you come
4 to that number?

5 A The home is old --

6 Q Okay.

7 A -- and it needs lots of repairs.

8 Q Okay.

9 A There are numerous things that had to be done,
10 including, you know, repairing rotted wood, parts -- you
11 know, the roof, you know, water heater, I believe. I
12 think it's the water heater. Yeah. Anyway, it was vacant
13 for five months also and it just required a lot of -- a
14 lot of work.

15 Q When did you put this work into the home?

16 A I was there over the summer of 2014.

17 Q How long were you there over the summer of 2014?

18 A I don't know the specific time frame.

19 Q Was it more than a week?

20 A Yes.

21 Q Was it more than two weeks?

22 A Yes.

23 Q Was it more than three weeks?

24 A Yes.

25 Q Was it more than four weeks?

1 A Maybe. That's where I'm not sure. I mean --

2 Q So maybe more than four weeks. Was it maybe
3 more than five weeks?

4 A Again, I'll have to refer to my records.

5 Q Okay. Where was [REDACTED] when you were in Virginia
6 in the summer of 2014?

7 A I'm not sure exactly where she was the whole
8 time.

9 Q Was she in Virginia?

10 A No. I asked the family to go with me and help
11 me and she refused.

12 Q Okay. Where were the children? Were they with
13 you or were they with her?

14 A They were with her.

15 Q Okay. So for a month in 2014 you left [REDACTED] alone
16 with the children, right?

17 A Yes.

18 Q Okay. Did you have concerns about [REDACTED]'s mental
19 health in the summer of 2014?

20 A Yes.

21 Q Okay. So you had concerns about her mental
22 health and how she would handle the children, correct?

23 A It has been a concern of mine ever since May of
24 2013.

25 Q Since May of 2013?

1 A Yes.

2 Q Okay. But you left [REDACTED] alone for at least a
3 month with the children while you went to another state,
4 correct?

5 A Yes.

6 Q Okay. Did you ultimately get this rental home
7 fixed up to your satisfaction?

8 A My satisfaction, no.

9 Q Okay. Did you ultimately get it fixed up so
10 that it could be rented?

11 A Yes.

12 Q Ultimately so it could be rented at just a shade
13 under \$3,000 a month, right?

14 A Yes.

15 Q Okay. The total amount of money that you put
16 into that home in the summer of 2014, do you know what
17 that number was?

18 A The exact number?

19 Q Correct.

20 A No --

21 Q Do you know an estimate?

22 A -- not off the top of my head.

23 Q Do you have an estimate?

24 A I know it was over \$12,000, maybe higher.

25 Q And do you know which of your accounts the money

1 came from that went into fixing up the home?

2 A There are -- no, I don't know exactly which
3 accounts.

4 Q Have you had to put any money into that rental
5 home since the summer of 2014?

6 A Yes.

7 Q How much have you had to put in?

8 A It's been thousands.

9 Q How many thousands?

10 A Rough estimate -- I can't give you precise -- I
11 still owe some money to people fixing it. It will go
12 easily above 3,000, maybe 4,000.

13 Q When was the last time that you put money --
14 what was the last repair that you guys did on the rental
15 property?

16 A Yesterday.

17 Q Okay. What was the repair?

18 A A faucet had to be replaced that was leaking and
19 then a toilet had to be replaced that cracked. And that
20 was substantial man hours involved.

21 Q Who did it?

22 A I have people that do it. I have someone that
23 helps manage and he just figures out who will do what.

24 Q What did he charge you for this repair?

25 A It varies. I haven't got a formal bill from him

1 yet.

2 Q What was the last repair that you had done on
3 the rental property before yesterday?

4 A There was a problem with the furnace, and that
5 still needs to be resolved and I still need to pay that
6 bill, too.

7 Q So it's been fixed or it hasn't been fixed, the
8 furnace?

9 A It's got to be inspected because it's a gas
10 furnace.

11 Q Okay. That's a pending future problem you
12 think, right?

13 A I hope not. It has to be taken care of
14 because --

15 Q Because it's gas, right?

16 A We're responsible to provide a good home.

17 Q Okay. What was the last repair, though, before
18 yesterday?

19 A That was the replacement of the toilet that I
20 alluded to.

21 Q And the last repair before replacing the toilet?

22 A That was the furnace --

23 Q Which hasn't been --

24 A -- the gas supply and it's -- I don't know the
25 specifics of it, but that is something that needs to be

1 taken care of.

2 Q Okay. Between the summer of 2014 and yesterday
3 what are the repairs that you had to do to the house?

4 A Okay. We had a problem with water getting into
5 the home. There was some bad rains, so it actually
6 flooded the crawl space and I had to have -- I had to have
7 them go in with special equipment to dry it out. As far
8 as the specifics, you know, it took quite some time to do
9 that and it was taken care of, but they had to do
10 modifications to the drainage of the gutters coming off of
11 the house. And it was just because of extreme rains,
12 unprecedented. So that caused a problem.

13 Q Anything else?

14 A There was lots of yardwork that needed to be
15 done.

16 Q Did you include that in your maintenance?

17 A Yes, yardwork is maintenance.

18 Q Okay.

19 A I had to purchase supplies to do the yardwork.
20 I had to purchase a new lawn mower because the home was
21 vacant. So I had to provide a lawn mower for someone to
22 do the yard.

23 Q In 2014 you mean?

24 A Yes. You're talking about the time frame from
25 the summer --

1 Q Yes.

2 A Yes, it was during that time frame.

3 Q Okay. So you had to fix the yard up and you had
4 a flooding issue, right?

5 A No. Actually the flooding was inside of the
6 crawl space of the home.

7 Q Okay. Anything else between 2014 and yesterday?

8 A There was some more things, but I can't recall
9 everything.

10 Q And do these bills get paid out of different
11 accounts or do they always get paid out of the same
12 account?

13 A Normally I try to keep it to the same account.
14 However, I don't know for sure exactly how every bill was
15 paid. I do pay sometimes in cash and I did that quite
16 often when I was there to pay people doing work and I paid
17 them cash.

18 Q Okay. How long are the tenants going to
19 continue to be in this property? How long is the lease
20 for?

21 A It is a three year term, and that should be like
22 December 2014 to three years later, 2017.

23 Q Are they good tenants?

24 A So far I have no complaints.

25 Q Okay. Have you thought about what you want to

1 do with this -- if you had your way what you would do with
2 this rental property in the divorce?

3 A Well, once again it's too early to determine
4 anything with my family situation or our assets.

5 Q Okay. So you haven't really thought about it
6 yet what you want to do with this?

7 A No.

8 Q Okay. What about the marital home?

9 A Same.

10 Q Don't know yet?

11 A Don't know.

12 Q Okay. Have you had a chance to talk to your
13 sister about her coming over to the marital home a couple
14 weeks ago and causing a scene?

15 MR. THACKER: Object to the form.

16 Answer as best you can.

17 A Yes.

18 Q And what's your understanding of what happened?

19 MR. THACKER: Object to the form.

20 Answer as best you can.

21 A From what I understand my sister -- I didn't
22 think much about it because my daughter wanted to get a
23 certain bathing suit to wear. So she says, okay, on the
24 way to the pool I will stop off at the house and have REDACTED
25 just go in the house and get her bathing suit. And, oh,

1 by the way, [REDACTED] wants a different bathing suit, too. So
2 she went to the house. The front door was locked and my
3 wife came out yelling at her saying what are you doing
4 here on my property. I believe my wife also stated that I
5 hope I never see you again.

6 Q And is that when your sister starting screaming
7 at your wife and flipped her the bird?

8 MR. THACKER: Object to the form.

9 Answer as best you can.

10 A I wasn't there to witness it. However, I'm just
11 telling you what I was told.

12 Q From your sister?

13 A And her daughter. Her daughter was there, too,
14 along with my daughter.

15 Q Your sister's daughter?

16 A Yes.

17 Q Did you talk to your sister about how maybe
18 that's just not a good thing to have happen out in public?

19 A My sister is one of the meekest people around.
20 She is a grade school teacher. She is very controlled,
21 very nice. This whole thing shocks me. So obviously she
22 was -- if she did do something she was provoked.

23 Q So if your sister was flipping the bird in the
24 middle of the road it was [REDACTED] fault, right?

25 MR. THACKER: Object to the form.

1 Answer the question as best you can.

2 A I don't think -- I really don't have an answer
3 for that.

4 Q There was an incident a couple of months ago
5 where you were -- I guess you had a flat tire out in front
6 of the marital home; is that right?

7 A Yes.

8 Q Okay. Tell me what happened.

9 A Well, driving to the house there was no problem
10 with my vehicle, and then I went and pulled in the
11 driveway. As far as the vehicle is concerned, I turned
12 around and I backed out of the driveway and I sort of
13 heard a click noise. I was going to visit my friend right
14 across the street, but then I was concentrating on the
15 click. So I drove further down the street and it just
16 kept -- it kept occurring.

17 So I got out of the vehicle, looked, and there
18 was a nail in my left rear tire. So then when I'm looking
19 at it it's like, oh, boy, if I pull it out I'll get a
20 flat, if I drive it I'll get a flat. So I called AAA to
21 come fix it.

22 And then I saw my son coming into the middle of
23 the street down there. So I got out of my car and went
24 down there and basically told him to get out of the middle
25 of the street. And he stated that he heard air coming out

1 of it. So then I knew for sure I'd just park the car
2 where it's at, wait for AAA to come and fix it. In the
3 meantime I told him to go back to the house and I was
4 going to visit my friend across the street until AAA came.

5 Q So there was an agreement that you had made that
6 you were -- that [REDACTED] was going to have possession of the
7 home during the pendency of this litigation, right? You
8 have a no contact order. You're not supposed to talk to
9 [REDACTED] right?

10 MR. THACKER: Object to the form.

11 Answer as best you can.

12 A Okay. As far as the agreement that you're
13 talking about, you have a copy of all that stuff. I would
14 have to get a copy of it myself and, you know, regurgitate
15 to you everything it says.

16 Q Do you think it was appropriate that you were
17 hanging out in front of the home the way you were hanging
18 out?

19 A Yes, it was perfectly legal.

20 Q Okay. And that clicking noise you heard, I
21 assume that that was the -- you think that was the nail
22 that you heard in your tire?

23 A Yes, that was the nail that was in the tire.
24 And the sort of funny thing about it is when my son went
25 to look at that, we also looked in the driveway of the

1 house and there seemed to be a big pile of dirt in that
2 driveway where my tire went over while I was dropping them
3 off.

4 Q So you literally heard the nail pierce the tire;
5 is that right?

6 A No.

7 Q You just heard the tire -- every time it would
8 rotate you could hear the click of the nail --

9 A Yes.

10 Q -- against the ground?

11 A Yes. I had the windows down.

12 Q Okay. And then instead of pulling away and
13 going away you instead circled back around and parked your
14 vehicle?

15 A Well, I initially turned that way because my
16 intent was to visit with my friend across the street
17 anyways. To do that I had to go in that direction to get
18 into his driveway.

19 Q Okay. So you heard the clicking noise, but you
20 were still going to go visit your friend, right?

21 A Well, that was the original intent, and then I
22 figured since I can't move the vehicle I will still go
23 visit him.

24 Q Okay. Where did you park the vehicle?

25 A In front of my friend's house.

1 Q Okay. How far away was that from your house?

2 A It's across the street.

3 Q Okay. So if you were [REDACTED] and you were looking
4 out the window of the home you could see your car right
5 out the window, right?

6 A Yes.

7 Q Did you ultimately go visit with your friend?

8 A Yes.

9 Q Okay. And then did you ultimately come back to
10 your vehicle and hang out in your vehicle for a bit?

11 A No.

12 Q Okay. When did you call AAA?

13 A When I stopped down the road after I noticed the
14 clicking and looked out and saw what the problem was then
15 I called.

16 Q Okay. So then you were across the street
17 visiting a friend's house. You went and visited with him,
18 right?

19 A Yes.

20 Q How long did you visit with him?

21 A I'm not sure of the exact amount of time. I
22 would say it's probably about maybe a half an hour to an
23 hour.

24 Q Okay. And then you got back into your vehicle,
25 right?

1 A No.

2 Q Okay, no.

3 A What happened was while I was talking to him all
4 of a sudden there were three police cars that pulled up.
5 So then we stayed in his driveway until the police came
6 and spoke to me.

7 Q Okay. Then after the police came is that when
8 you called AAA?

9 A No, no. As I stated before, I pulled out of the
10 driveway. I heard the clicking and I went down the road a
11 little further. I got out, saw the nail in the tire.
12 Then I called.

13 Q Okay. And that's -- and where were you parked
14 at this point when you called AAA?

15 A A few houses down from my house.

16 Q Okay. And then after calling AAA you got back
17 into your vehicle and drove the vehicle back towards --
18 right in front of your house?

19 A Yes. After I saw my son in the middle of the
20 road, yes, I did.

21 Q Okay. So then you were waiting a few houses
22 down. You had called AAA. And that's when you saw your
23 son in the middle of the road?

24 A About that time, yes.

25 Q Okay. Which son was it?

1 A [REDACTED]

2 Q Okay. Did [REDACTED] come out to see why you were
3 hanging out?

4 A Well, I'm not sure what his intent was; but,
5 yes, he did see me.

6 Q He came out to see dad because dad was still --
7 dad didn't leave, right?

8 MR. THACKER: Object to the form.

9 Answer as best you can.

10 A I'm not sure what his motivation was; but,
11 anyways, there he was in the middle of the road so I came
12 back down.

13 Q Then you turned around and drove your vehicle
14 back, right?

15 A Right. I told him to get out of the road.

16 Q And said go back in the house [REDACTED]

17 A After we looked at the tire and we looked at the
18 pile of dirt in the driveway I said go back home and then
19 I went to visit my friend.

20 Q The friend that you were going to visit anyways,
21 right?

22 A Yes.

23 Q Which is why you had driven in the opposite
24 direction of the direction you needed to go to leave,
25 right?

1 A Yes.

2 Q Okay.

3 A It wasn't -- I wasn't leaving. I was previously
4 informed that there was no problem with me to visit my
5 friends in the neighborhood. It was perfectly legal. And
6 to this date it still is.

7 Q You wanted [REDACTED] to see you out front of the
8 house, didn't you?

9 A No, that wasn't my intent at all. That's why I
10 pulled down to the other side of his driveway where she
11 wouldn't see my vehicle.

12 Q You wanted [REDACTED] to know that you weren't going to
13 leave if you didn't want to, correct?

14 MR. THACKER: Object to the form, asked and
15 answered.

16 A No.

17 MR. THACKER: Answer as best you can the
18 question that you were asked.

19 A No.

20 Q Where are you currently staying at?

21 THE DEPONENT: Can I speak to my lawyer one
22 moment?

23 MR. DENMON: Okay.

24 (Whereupon, a break was had.)

25 MR. DENMON: Back on.

1 Q Your friend across the street from the marital
2 home, what's his name?

3 A His name is [REDACTED]

4 Q What's [REDACTED] last name?

5 A [REDACTED]

6 Q Are you good friends with [REDACTED]

7 A Well, as soon as he moved in we talked quite
8 frequently. He moved in. So, yes, I'd consider -- not --
9 friends, yes.

10 Q Friends. If I asked [REDACTED] do you think that [REDACTED]
11 would consider you guys good friends?

12 MR. THACKER: Object to the form.

13 Answer as best you can.

14 A Yes.

15 Q Have you gone back to see [REDACTED] after this
16 incident happened?

17 A I don't meet him at the house.

18 Q When is the last time you've seen [REDACTED]

19 A I'm not exactly sure when, but it was a few
20 months ago.

21 Q After this incident or before this incident that
22 we've been talking about?

23 A From the current time today I believe it was,
24 you know -- I don't know, two, three months, but I haven't
25 spoke to him because his father was admitted to the

1 hospital and he's very sick and so he's been very busy
2 with taking care of his family.

3 Q Okay. The last time you spoke to him, was it
4 this time that the cops got called out?

5 A No.

6 Q Okay. The time after that that you spoke to
7 him, was it on the phone or in person?

8 A In person.

9 Q Okay.

10 A Well, no, let me correct that, too. He also
11 sent me a text message informing me that his father was in
12 the hospital.

13 Q Did he ask you not to contact him?

14 A No.

15 Q Okay. Going back to your financial affidavit,
16 we were -- I'm going to turn your attention to page three.
17 I'm looking at the household expenses. That monthly
18 mortgage or rent payment, is that the mortgage on the
19 marital home?

20 A Yes.

21 Q Okay. That's 2,398; is that correct?

22 A That's what it says, yes.

23 Q Okay. Are you still paying that mortgage?

24 A Yes.

25 Q When was the last time you made a payment on the

1 mortgage?

2 A This month.

3 Q Okay. Is it in arrears or is it current and up
4 to date?

5 A It's up to date.

6 Q Okay. Have you made any changes to any of the
7 homeowner insurances?

8 A I'm not sure. Are you talking about both homes
9 or the marital home?

10 Q Let's start with the marital home. Have you
11 made any changes to the marital home insurance?

12 A I don't think so. There is -- you know, you
13 have to get flood insurance on that home, too, so there is
14 more than one insurance provider.

15 Q Okay. When you say you don't think so, what
16 causes you to think that there is a possibility that you
17 made a change to one of your insurances associated with
18 the home?

19 A Well, I know I didn't make a change. However,
20 there might have been a change of who provides the
21 insurance. I believe one of the insurance companies was
22 bought out by another. And whether a change was made with
23 the transfer over, I don't think so. That's why I can't
24 speculate as to what's -- if you look at one policy
25 compared to another policy if there are any differences.

1 Q Okay. But you haven't called the insurance
2 company and said, hey, I want to make a change with this
3 insurance policy associated with the home?

4 A No, I did not. Why would I do that?

5 Q I'm asking if you did.

6 A No.

7 Q And what about with the rental home? Any
8 changes with the insurance with that?

9 A Yes.

10 Q Okay. What change have you done?

11 A Well, I didn't realize it, but they said that I
12 needed to change it to a rental insurance, and all along
13 it was showing as a homeowner insurance.

14 Q Okay.

15 A And so that's -- they made the change and I was
16 like, okay, thanks.

17 Q Okay. When did that happen, recently?

18 A Yeah, fairly recent.

19 Q Okay. Any other changes that you've done with
20 any of the other insurances that might be associated with
21 these residences, flood, anything else?

22 A As far as any changes there might have been some
23 other changes, but everything done -- I'm not sure exactly
24 what changes. I know that there had to be some changes
25 just because of, you know, sometimes you have excess

1 insurance on certain things. And I spoke to some of the
2 people working there and they make changes to help me out.
3 They're very good to work with. They've turned around and
4 made this one change and it dropped the amount of
5 insurance and I was like, okay.

6 Q On which property?

7 A The rental property.

8 Q On the rental property, okay. Are you paying
9 the same amount of insurance for the home that you were --
10 when the separation happened?

11 A The insurance -- there are two insurances on the
12 home.

13 Q Okay.

14 A You have escrowed insurance, homeowners, that
15 goes with the mortgage payment.

16 Q Correct.

17 A The mortgage payment did change. It was a lot
18 higher like for the 2013 year up until they did something
19 with the Waters Biggert Act and they lowered the amount.
20 So I mean as far as everything goes the actual mortgage
21 payment has been steady since that change. Before this
22 mortgage payment it used to be over 3,500.

23 Q Okay. But it's been steady since you filed for
24 divorce, right --

25 A Right.

1 Q -- since there has been a filing for a divorce?
2 Okay. Car insurance, did you remove one of the vehicles
3 from your auto insurance plan?

4 A Okay. As far as the vehicles go --

5 Q Uh-huh.

6 A -- this is another thing. When I called the
7 insurance they informed me that I could not carry my
8 spouse on insurance because she no longer resided under
9 the same roof with me. So they said that she couldn't be
10 covered. I got them to agree to extend it two weeks until
11 she got her own policy.

12 Q Your insurance company called you and told you
13 that, or did you call the insurance company?

14 A No, I called the insurance company.

15 Q Okay. And what did you say to the insurance
16 company?

17 A Well, the original call -- basically we had an
18 issue with my son driving the vehicle. I have an issue
19 with him driving.

20 Q This would be [REDACTED]

21 A This is [REDACTED]

22 Q The 18 year old, correct?

23 A Correct.

24 Q Okay.

25 A I was worried he was driving it by himself. He

1 only had a learner's permit, which I understand he finally
2 got a driver's license within the past month or so. But I
3 also have concerns that he's not taking his ADHD medicine.
4 He has trouble controlling his impulses and making good
5 decisions.

6 Q When is the last time you talked to him?

7 A It was April.

8 Q Okay. And when did you call the insurance
9 company?

10 A I'm not sure of the exact date, but it was after
11 the deposition.

12 Q Uh-huh.

13 A And after the deposition we were informed that
14 she was letting my oldest son drive the car. So I
15 basically informed her to get insurance and -- because I
16 did not have him covered as a driver under our current
17 policies.

18 Q So how did you handle it with the insurance
19 company? You called them because you were concerned that
20 your oldest --

21 A Right --

22 Q -- was driving?

23 A -- I called them.

24 MR. THACKER: [REDACTED] let him finish before you
25 answer, okay.

1 THE DEPONENT: Okay.

2 MR. THACKER: Just so the record is clear and
3 you don't talk over each other.

4 THE DEPONENT: Yes.

5 Q So you were concerned that your eldest was
6 driving a vehicle and you didn't want that to happen,
7 driving it alone, so you called the insurance company,
8 correct?

9 A Yes.

10 Q Okay. And so what did you tell them, what
11 happened?

12 A Well, basically -- and I don't recall all the
13 specifics.

14 Q Okay.

15 A What it comes down to in a nutshell is
16 she needed -- I said give her two weeks to get her own
17 policy on the vehicles.

18 Q Okay. So you called to remove her from your
19 insurance is what you did, right?

20 A Yes, for more than one reason. For one, she
21 would not be covered under my existing policy, period.
22 The other reason is concerns over my son driving without
23 having a proper license or medication.

24 Q And you removed both of the vehicles that were
25 still at the marital residence from your insurance,

1 correct?

2 A No.

3 Q Okay. Which one?

4 A I did not remove them.

5 Q Okay.

6 A I turned around and I put it on 14 days.

7 Q Okay.

8 A And what I did was -- they said, well, probably
9 the most prudent thing to do is you put one in like
10 storage mode to where it will sit for a minimal storage
11 bill and then you carry the insurance full on the other
12 one for the 14 days until she gets her insurance, because
13 she has two vans sitting in the driveway and she really
14 only needs one van to drive. So, therefore, she was never
15 put out. She never had a vehicle that was uninsured.

16 Q Okay. [REDACTED] is going to -- he's going to USF now,
17 right? Isn't that correct?

18 A From what I was told he's going to the
19 University of South Florida St. Pete.

20 Q Like you mentioned, you don't have very good
21 communication with him, right? No communication with him,
22 right?

23 A There have been attempts. I have told my wife
24 to have him talk to me. I have called the home numerous
25 times and he refuses to communicate with me.

1 Q Has he communicated with you since you guys had
2 a physical violent episode?

3 MR. THACKER: Object to the form.

4 Answer as best you can.

5 A He did attack me while I was doing homework one
6 time. We spoke after that. Then he came after me another
7 time, and we spoke after that. So, yes, we did
8 communicate after he was aggressive against his father.

9 Q So he attacked you, is that what happened?

10 A Yes.

11 Q Okay. You didn't go and attack him and get
12 physically violent with him?

13 A No. There are police reports on this, too.

14 Q On page six of your financial affidavit you have
15 assets and liabilities. Under stocks and bonds you list a
16 Schwab account, and then underneath that you have a Schwab
17 husband's and then you have a Schwab custodial account for
18 children and then a Schwab education savings for children,
19 correct?

20 A Yes.

21 Q Okay. And those last two, the custodial account
22 and the education savings for children, you have listed
23 that those should go to the children; is that right?

24 MR. THACKER: Object to the form.

25 Go ahead and answer.

1 A Well, under the line of husband it says children
2 for the Schwab custodial account for children.

3 Q Uh-huh.

4 A And then for the Schwab education savings for
5 children it says children.

6 Q Okay.

7 A And that's under Column C, nonmarital husband
8 column.

9 Q Do you have any problem with freeing up some of
10 that money that's for the children for ■ who is now in
11 college?

12 MR. THACKER: Object to the form.

13 Answer as best you can.

14 A Okay. Once again I informed my wife numerous
15 times that my son ■ should talk to me about any of this
16 and then I can determine what he needs, what he doesn't
17 need. However, for a fact I know he basically has a free
18 ride to college right now. He'll get a check over \$900
19 after the end of the semester. He lives at home. He has
20 room and board taken care of. He really has no financial
21 need at this time.

22 Q How does he get to college? Do you know?

23 A No.

24 Q Okay. You don't want him driving to school, do
25 you?

1 A During my wife's deposition she stated she would
2 drive him to school.

3 Q I'm saying that you don't want him driving to
4 school or you wouldn't have taken him off your insurance,
5 right?

6 A That is not true. I want him to go to school.
7 If he could demonstrate that he is licensed, taking his
8 medicines and is a safe driver, then I have no problem
9 with it. However, I have witnessed him being erratic many
10 times while driving. Even my children say they have a
11 problem when he drives. My daughter personally says that
12 she has to correct him all the time.

13 Q How old is your daughter?

14 A Eleven.

15 Q And she tells you that she physically corrects
16 his driving?

17 A No. She has to yell at him and tell him to
18 watch things, slow down, put hands on the wheel,
19 everything.

20 Q Okay. So you think then that [REDACTED] should be
21 responsible for driving [REDACTED] to school then?

22 MR. THACKER: Object to the form.

23 Answer as best you can.

24 A Yes.

25 Q That's kind of what traditionally she's done,

1 right? She made sure the kids get to where they needed to
2 go, right?

3 A There is another option that's available to the
4 university. He can ride the bus for almost free from our
5 house to the school. I understand he's also made some
6 friends who he can ride with, too. I also have my family
7 that could give him transportation. There are many
8 options.

9 Q But I guess to bring it full circle, you don't
10 think this education savings account which you've listed
11 for the children should be something that is freed up for
12 ■ right now because he doesn't need it, right?

13 MR. THACKER: Object to the form.

14 Answer as best you can.

15 A No, I never said that.

16 Q Okay. Then do you think this is something that
17 you would consider freeing up so ■ can get access to
18 some of these funds?

19 MR. THACKER: Object to the form.

20 Answer as best you can.

21 A As I previously stated, I need to talk to my son
22 to determine what his needs are, what his goals are.

23 Q Okay. Is that perhaps something that maybe you
24 should be talking to ■ about?

25 A Yes, if we had a normal relationship and if she

1 was able to process things properly, but that is not the
2 case.

3 Q Okay. So she's incapable of having an
4 intelligent conversation with you about how to free up
5 money for finances; is that right?

6 A There have been many occasions where she has
7 been unable to reason about any of our financial assets --

8 Q Okay.

9 A -- within the past -- ever since May of 2013.

10 Q Okay. But your son would be able to reason with
11 you about the finances, correct, because he needs to talk
12 to you, right?

13 A My son can relay to me everything that he's
14 doing, what all his needs are, what all his expenses are
15 and what his plans are. I happen to know quite a bit
16 about helping him out and I've offered that to him many
17 times. He refuses to speak to me because my wife has
18 poisoned him against me.

19 Q Your wife's incapable of having a discussion
20 about finances with you, but you said that she should be
21 the one that drives your child to and from school; is that
22 right?

23 A Let me explain what I stated. She said that she
24 would drive my son to school in her deposition. I do not
25 know how he's getting to and from school.

1 Q You said earlier today that she should be the
2 one that drives your son to and from school.

3 MR. THACKER: Object to the form. That's really
4 not a question. Also are you asking him if he said
5 that?

6 MR. DENMON: Yes, that's the question.

7 MR. THACKER: All right. Then you can answer as
8 best you can.

9 A I don't know what I said, but I do know that she
10 said that she would during the deposition transport him to
11 school.

12 Q And that's okay by you?

13 A Versus him driving himself, that is the better
14 option.

15 Q And so you're telling us today that [REDACTED] has
16 poisoned your 18-year-old son against you?

17 A Yes.

18 Q Okay. Why do you say that?

19 A Well, it goes back to the needed discipline for
20 him. He would stay in his room for almost a day doing
21 nothing but playing a video game. So when he had problems
22 with his school work, not helping around with the house,
23 refusing to do chores, I decided to take away his video
24 game. His mother gave him the video game back without
25 consulting with me.

1 I had a problem with him texting on his phone.
2 I caught him like two in the morning on a school night. I
3 took his phone away. His mother gave him the phone back.

4 Q How old was [REDACTED] at the time that you caught him
5 on his phone at two in the morning?

6 A I believe it was around -- he was 16 or 17.

7 Q Was it last year or two years ago?

8 A It was probably two years ago.

9 Q So your problem then is that you needed to
10 discipline [REDACTED] and [REDACTED] didn't like the way that you
11 disciplined him?

12 A [REDACTED] does not discipline [REDACTED]

13 Q But you do?

14 A I try.

15 Q And you used physical discipline with [REDACTED]
16 correct?

17 A It's to the point to where I cannot do that
18 because he's so big. So you have to, you know, try to do
19 some other way of disciplining him by taking away
20 something that he's abusing for his good.

21 Q When he was younger and smaller you were able to
22 physically discipline him; is that right?

23 A Yes.

24 Q And now that he's bigger it doesn't work any
25 more; is that right?

1 A Yes.

2 Q Under your stocks and bonds you have a husband's
3 Schwab, and in parentheses you put husband's premarital
4 amount to be determined.

5 A Yes.

6 Q Okay. Have you attained any expert or done
7 anything to determine an amount that you think is
8 premarital of this account?

9 A No.

10 Q Okay. Do you have an idea of how much you think
11 this account should be set aside as a premarital asset?

12 A No.

13 Q Why do you think some of this should be set
14 aside as a premarital asset?

15 A This is an account that I had prior to marriage.

16 Q The Schwab.

17 A Yes.

18 Q Okay. And do you have a statement of what that
19 account value was before you got married?

20 A I have many statements. I'm not sure. I'd have
21 to reference them.

22 Q Okay. Above that you have a Bank of America
23 money market account. It says ITF two minor children. Do
24 you see that?

25 A Yes.

1 Q What kind of account is that?

2 A Okay. The ITF thing, that sort of got messed up
3 anyways because I was trying to get all four children
4 under it and I don't know how that happened, but what
5 happened was this was a -- sort of a reaction to my wife
6 taking money out of a joint account we had behind my back
7 without my knowledge or my permission.

8 When I went to the bank and verified it they
9 said, well, you better take the rest of it out because
10 we've seen this before, and so they set up another money
11 market for me to put the money in there and then I had to
12 ask my wife what she was doing.

13 Q What was the account that you drew from to put
14 this money in this money market account?

15 A Offhand I don't know the specific account, but
16 it was obviously a Bank of America account.

17 Q Okay. What year did that happen?

18 A That happened in 2013.

19 Q And so why did you set this up with some of your
20 children on the account? I mean what happened.

21 A Well, that's -- that's what I had to do.
22 Instead of -- I wanted to put my children on it instead of
23 wife because she was taking assets. She opened up her
24 separate P.O. box. She did a whole bunch of things
25 separately, and I needed to figure out what the heck was

1 going on. And this is under the best advice I did what
2 was -- what I needed to do.

3 Q Okay. So your wife's name is not on this
4 account, right?

5 A Yes.

6 Q No, it's not on the account, correct?

7 A It's not on the account, yes.

8 Q Okay. Your wife does not have access to this
9 account, does she?

10 A No.

11 Q Okay. So earlier today when we first started
12 talking you had mentioned that your wife had access to all
13 of the accounts that you had access to. Do you remember
14 saying that?

15 A Prior to the marital difficulties, yes.

16 Q Okay. When were the marital --

17 A May 2013.

18 Q Okay. So after May 2013 that's changed, right,
19 she doesn't have access to all the accounts any more?

20 A After May 2013 she started doing a bunch of
21 irrational things, and in October of 2013 this is when I
22 found out she was taking money out of the joint account
23 and putting it in her own separate account she created.

24 Q Okay. So this account then was created
25 somewhere around October 2013 give or take, right?

1 A Right, along with her new accounts and her
2 separate P.O. box that she opened, all the other things
3 that she did, and basically I was informed, well, she
4 might be preparing for a divorce.

5 Q Okay. Do you have any rhyme or reason of why
6 you used this particular account, this Bank of America
7 money market account?

8 A Everything I do is for the better of the family.
9 Everything I did was to cover all of our debts, you know,
10 expenses, investments. So basically I took care of the
11 finances and investments of the family.

12 Q Okay. The Schwab account that says husband's
13 checking, does [REDACTED] have access to that account?

14 A No.

15 Q Okay. That's solely titled, correct?

16 A Okay. This account was her only point of
17 contention. What happened, we had a joint account and it
18 was a brokerage account. You could write checks on it.
19 Schwab changed their policy to where you could only write
20 checks on a bank account. So they turned around -- some
21 guy in Denver created a second account and her name was
22 dropped off of the checks.

23 Q This account was a joint account, but because of
24 some guy in Denver her name disappeared from the account?

25 A Yes.

1 Q When did that happen?

2 A I do not know an exact date.

3 Q Was that in 2013?

4 A I do not know.

5 Q Was it in 2014?

6 A I don't know the date. I mean it was before
7 2014.

8 Q Before 2014, okay. And was it before 2013 or
9 you don't know?

10 A I don't know.

11 Q Okay. The Wells Fargo PMA account, is that
12 solely titled in your name?

13 A Now it is, yes.

14 Q Okay. And when did that one become solely
15 titled in your name?

16 A Well, it's actually -- it actually started out
17 as an account just for our mortgage to where we could --
18 you know, if we wanted to pay our mortgage we could do it,
19 but I put it -- I put the account in my name especially
20 after she started moving things.

21 Q Which mortgage, the rental or the --

22 A The rental.

23 Q The rental, okay. And then in 2013 then you put
24 the account in your name only?

25 A I'm not sure of the exact date or the

1 circumstances. It was more like, well, we might use this
2 account. And the people at the bank said, well, just open
3 one up anyways because you have a mortgage with us.

4 Q Sure. Before you started to get worried
5 about -- well, before you started taking [REDACTED] name off
6 the accounts did you carry any balance in this checking
7 account associated with the Wells Fargo?

8 A I'm not sure.

9 Q Okay.

10 A I think you have to have a minimum to have an
11 account, and I think that was all that was in it.

12 Q Okay. Now, as of June of this year there is
13 almost \$30,000 in the account, right?

14 A It says 27 in the affidavit here, 27,962.

15 Q What money did you transfer into this account to
16 build up this balance?

17 A I don't know.

18 Q You handled the finances during the marriage,
19 right?

20 A Yes.

21 Q And in part because you just testified that [REDACTED]
22 couldn't handle it because you just don't think she could
23 handle it, right?

24 A We were advised by Dr. [REDACTED] of the Mayo Clinic
25 that I should handle the family's finances due to her

1 cognitive disabilities.

2 Q So there is a doctor that told you that you
3 needed to do this, is that what you're saying now?

4 A That's a fact.

5 Q Okay. But you don't know how you ended up with
6 \$30,000 in this Wells Fargo account?

7 A Well, here is the thing. There is many
8 accounts, many we're shuffling around. And if I do the
9 research I can give you the exact accounts, but I don't
10 know the numbers off the top of my head. All I do know is
11 that I paid bills between the Bank of America, Schwab and
12 Wells Fargo.

13 THE REPORTER: Excuse me. Could I have a
14 bathroom break?

15 MR. THACKER: Certainly.

16 (Whereupon, a break was taken.)

17 Q Any other Bank of America accounts besides your
18 checking account and the money market account?

19 A Okay. What's listed here is checking --

20 Q Uh-huh.

21 A -- Bank of America and then there is money
22 market Bank of America.

23 Q Okay. Any other accounts besides what's listed
24 here?

25 A There are several joint accounts. Well, one --

1 I didn't count in here. Yeah. The only thing was a
2 custodial with my kid, but I closed that one because I
3 wanted to have equal number of accounts for every kid. So
4 I've got equal number of accounts for Schwab for every
5 kid. Each kid has one custodial account. I didn't want
6 to show favoritism because they complained about the
7 mother showing favoritism for the oldest on numerous
8 occasions.

9 Q My question was if there was any more Bank of
10 America accounts, or is it just these two Bank of America
11 accounts?

12 A From what's on my financial affidavit here it
13 shows two that are in my name so --

14 Q So that's it?

15 A In my name only, yes.

16 Q And that custodial account that you said you
17 closed, who was that with? Was it with Bank of America?

18 A Yes, it was with my oldest son.

19 Q And when did you close that?

20 A I closed that recently.

21 Q Okay.

22 A I think -- I don't know an exact date. It might
23 have been a few months ago. And I made sure -- I did that
24 after the other kids complained about the unequal
25 treatment. And I figured, well, this is just another

1 example and also to --

2 Q So you closed an account during the pendency of
3 this divorce; is that right?

4 A Yes, I closed several because --

5 Q An account that was in [REDACTED] name, right?

6 A Yes.

7 Q Okay. And right now [REDACTED] is not talking to you,
8 right?

9 A Yes.

10 Q Okay. But you're saying you closed that account
11 so you didn't seem like you were showing favoritism to

12 [REDACTED]

13 A I wanted to treat all the kids equal.

14 Q Okay. Did you close any other kids accounts?

15 A No.

16 Q Okay. And when you closed that account was this
17 the account that had about \$1,200 in it?

18 A I'm not sure of the exact balance. However --

19 Q Can you give me an estimate of the balance?

20 A -- I informed my son because he was -- he has
21 destroyed many things that I would take out the price of
22 destruction out of his account. He smashed a \$250 pair of
23 glasses for one item.

24 Q When did he smash the \$250 pair of glasses?

25 A I don't recall the exact time, but I know it was

1 after May of 2013.

2 Q Okay. So a couple of years ago he apparently
3 smashed a \$250 pair of glasses; is that correct?

4 A Yes.

5 Q Okay. And during the pendency of this divorce
6 you closed out an account that was in his name, right?

7 A Yes.

8 Q Okay.

9 A It was a custodial account that I had for him,
10 but I had two other accounts for him, and now every kid
11 has an equal number of accounts.

12 Q Okay. And the money that you took out of the
13 account that you closed, where did it go?

14 A It went to the bill paying account.

15 Q Okay. And to be fair you're saying that you --
16 you're making [REDACTED] pay you back for some glasses that he
17 smashed a couple of years ago; is that right?

18 A Yes, and various other things. He would destroy
19 things on purpose.

20 Q Okay. So --

21 A That was another thing that I was having issues
22 with his behavior. He was destructive with a lot of
23 things.

24 Q Okay. And so that's why you took out the \$1,200
25 or whatever it was recently and you stuck it into one of

1 your accounts, right?

2 A As far as -- as far as what happened, there were
3 a number of accounts that I closed with the Bank of
4 America because the balances got so low that they would
5 charge maintenance fees. It was no longer prudent to keep
6 these accounts.

7 Q Okay. Was this account with [REDACTED] was that one
8 of those accounts?

9 A This was one of the accounts that was closed,
10 yes.

11 Q Okay. And what is an estimate of the value that
12 was in that account?

13 A Offhand I don't know, but I know it wasn't as
14 high as what you stated.

15 Q Okay. Why did you not put that account on this
16 affidavit?

17 A Because it was with his name, too. Also it was
18 such a low amount and -- you know, as far as this goes, I
19 don't know why it didn't make it in here.

20 Q So tell me about the other accounts that didn't
21 make it on here.

22 A I have no idea. As far as I -- I believe every
23 account is in here.

24 Q Okay. You mentioned you had closed out a -- I
25 think your phrase was a bunch of little accounts that

1 didn't have a big value in them.

2 A Yes. I closed the Bank of America checking and
3 I closed the Bank of America money market.

4 Q Okay.

5 A I also --

6 Q The Bank of America money market that had
7 \$12,870 in here?

8 A Yes.

9 Q Okay. Where did that money go?

10 A That went to the Wells Fargo account which is
11 now the bill paying account.

12 Q Okay. When did you do that?

13 A Recently. And I don't know the exact date, but
14 it was -- it was a few months ago.

15 Q Why did you do that?

16 A Again, to keep from getting charged maintenance
17 fees because of low balance.

18 Q So you were getting a maintenance fee when you
19 had almost \$13,000 in the account for having a low
20 balance?

21 A From what I understand you have to have a
22 balance of like 25,000 to get no charges.

23 Q Do you know what that maintenance fee was?

24 A I believe it was around 25 a month.

25 Q Okay.

1 A But, again, I'll have to get into the
2 statements.

3 Q Okay. Any other Wells Fargo accounts besides
4 that PMA account?

5 A No.

6 Q Okay. Any other Charles Schwabb accounts besides
7 the four that you have listed here?

8 A If you go on the next page, page seven, there is
9 a retirement plan where it shows profit sharing, pension,
10 IRA, 401k, etc.

11 Q The RA?

12 A Yes.

13 Q Okay.

14 A That is a Schwab account.

15 Q That's solely titled in your name, right?

16 A Yes, it's my individual retirement account.

17 Q Did you have a \$100,000 CD in 2012?

18 A I have no idea. I don't know. I'd have to
19 check.

20 Q Okay.

21 A There was a lot of moving going on because we
22 were selling a house in one state and relocating to
23 another state. There was a lot of moves made. I'd have
24 to refer to many documents.

25 Q Okay. So then you can't recall whether or not

1 you had a \$100,000 CD with Bank of America?

2 A I would have to check.

3 Q Okay. Any other institutions that you banked
4 with in the last six years that are not listed here?

5 A Again, I'd have to check. This only goes back
6 how far? I mean --

7 Q I don't know. You did it.

8 A This is only a one year time frame, 2014, or
9 from when the time you file for divorce for a year back.

10 Q How long have you guys lived in Tampa, the Tampa
11 Bay area?

12 A My wife got here roughly a year before me --

13 Q What year was that?

14 A -- with the three kids. She moved into my
15 parents' house.

16 Q What year was that?

17 A I do believe it was 2011.

18 Q How many kids did she come with?

19 A All four.

20 Q Four. Four kids, right?

21 A She moved into my parents' place until we found
22 a place to live.

23 Q And where were you when she moved here?

24 A South Carolina.

25 Q Okay. And how long was she here with the four

1 children while you were still in South Carolina?

2 A Well, I visited regularly, but I could not
3 formally leave until I sold the home, and I do believe
4 July 2012 was the closing.

5 Q When in 2011 did she move down here?

6 A I think it was -- it was somewhere around July.

7 Q Of 2011?

8 A Yeah.

9 Q Okay.

10 A I'm not exactly sure of the dates.

11 Q And how long was she down here with the children
12 at your mother's house before she moved into a new
13 residence?

14 A I believe it was about maybe three months before
15 she moved over to the new residence. And then --

16 Q Okay. And then -- go ahead.

17 A Then she found a place that was, you know, a few
18 blocks away from my parents' house.

19 Q Okay. She found a place or did you help her
20 find the place or did she do it?

21 A My mother did.

22 Q And she was there for nine months living just
23 her and the children, correct?

24 A There were times when I would visit --

25 Q Okay.

1 A -- but she was in that home, and that's the same
2 home that was broken into by the pool person.

3 Q Okay.

4 A The exact number I'm not sure, but there is a
5 contract if we refer to it that would give you the exact
6 time frame.

7 Q Why did you stay in South Carolina when she
8 moved down here?

9 A Well, not by my choice. Actually my eldest son
10 was having troubles in school up in South Carolina.

11 Q Okay.

12 A So we made a decision based on the problems that
13 my son had in school that we would get him down to Florida
14 because we were going to move to Florida anyway and get
15 him established in another school. At that time he was a
16 freshman -- he would be a freshman in high school.

17 Q And, again, why did you not -- why did you stay
18 in South Carolina instead of coming down to Florida with
19 the family?

20 A Well, we had a home that needed to be repaired
21 and fixed before it could be sold. So I had to do all
22 those activities. And then I also had to finish up with
23 schooling. I had to take a semester off because of all
24 the family problems we had with my wife, you know,
25 getting -- almost dying and getting a traumatic brain

1 injury.

2 Q What year was that?

3 A That was 2011 -- oh, wait, 2008, sorry, is when
4 she got -- so then I took a semester off after that. So I
5 was behind schedule. And, anyways, that's just the way it
6 worked out.

7 Q So this injury that your wife had that causes
8 you such concern, that happened in 2008, right?

9 A Yes.

10 Q And in 2011 you sent your wife with the kids
11 down to Florida for a year while you stayed up in South
12 Carolina?

13 A I had family here more than we had in South
14 Carolina.

15 Q Okay. And your wife stayed with them?

16 A They were helping her out the whole time.

17 Q Okay. And she lived by herself with four kids
18 in the home while you were in South Carolina, right?

19 A My mother would spend the night at the house.

20 Q Every night?

21 A Not every night.

22 Q Okay.

23 A She would help -- she would take my kids to
24 school every day -- I believe my oldest specifically --
25 and they were always there to help. As a matter of fact,

1 one of the reasons why the guy got caught breaking into
2 the house is my dad went in there to install safety locks
3 in the home and he got trapped. So, you know, my parents
4 were there, you know, almost on a daily basis. That made
5 me happy that she had help more than we had any other
6 place.

7 Q And when did you move down from South Carolina
8 to Florida yourself?

9 A Well --

10 Q July of 2012, right?

11 A Well, after the home was closed and -- you know,
12 that was it. Then I could relocate.

13 Q Because you got your Bachelor's in civil
14 engineering in December of 2011, right?

15 A Yes.

16 Q And so then there was another seven months where
17 you were still in South Carolina just getting the house
18 ready for sale?

19 A Definitely. The home needed tons of work. I
20 spent a lot of time going back and forth to Florida. I
21 had to finish up some military things, too, and I had to
22 do my --

23 Q What were those?

24 A Well, I'm trying to remember exactly 2011.
25 Okay. Most of that -- what I was doing was I was also

1 applying for a Master's to go to school down here. So I
2 was going through that process. And so basically had
3 trouble selling the home, and that took a lot longer than
4 I thought it would. And I'm going to have to refer to
5 my -- I don't know -- to figure out everything else that I
6 did, but I was always busy.

7 Q In South Carolina?

8 A Ever since I retired I've been busy, yes.
9 That's the amazing thing about it. And we made an
10 agreement since she was no longer able to work that I
11 would go back to school and try to get the certifications
12 and everything I needed to where I could get a job.

13 Q And you've been going to school for quite some
14 time now, right?

15 A Yes.

16 Q About eight years?

17 A Yes.

18 Q Okay. But you still don't know if you're going
19 to be entering the workforce any time soon, right?

20 A Everything is in the air with the current family
21 situation. I'm just taking it day by day now.

22 Q Okay. In 2013 did your wife go visit family in
23 Mississippi in the summer?

24 A 2013?

25 Q Uh-huh.

1 A I went with her in the summer to visit family.

2 Q In 2013, right?

3 A Yes.

4 Q Okay. Did you cut that trip short early and
5 then come back home?

6 A I don't know what the specifics are. I have no
7 recollection, but if I did it was -- I'm sure there was a
8 good reason.

9 Q And if you did she would have stayed with the
10 kids in Mississippi while you were back here, right?

11 A Again I can't recall.

12 Q So you can't remember if in 2013 there was some
13 time that you were back here in Florida while your wife
14 was with the kids in another state, in Mississippi?

15 A There might have been. I'm not sure. I mean
16 I'll have to -- I'll have to just go back and check, you
17 know, look and see if there was anything that I was doing
18 or had to do.

19 Q And your wife spent some substantial time with
20 the kids in Mississippi in 2014, right, over the summer?

21 A To my objection. I would rather have my family
22 with me in D.C., you know, in the Virginia house. She
23 decided to do that on her own. And I didn't agree to it.
24 I didn't think it was the best thing for the kids. The
25 kids liked to visit Virginia and Washington, D.C. I

1 figured we should have some family time, and instead she
2 took the kids without my permission, without my agreement,
3 and I made it clear to her family they could come visit us
4 any time they want.

5 Q Do you have any problems with her family in
6 Mississippi?

7 A I don't have -- I don't have problems. I've
8 been nice to every one of them. There has never been a
9 problem, per say.

10 Q Did you object to your wife going to visit
11 family in Mississippi this summer with the kids?

12 A Yes.

13 Q Why?

14 A I initially had the understanding it was illegal
15 for someone to take the kids out of state while divorce
16 proceedings were ongoing. So, of course, I didn't give
17 her permission to do something which I thought was
18 illegal.

19 Q Did you eventually realize that that's not the
20 case?

21 A After she took them out of state without my
22 permission, yes.

23 Q Did it make you angry that she took them out of
24 state without your permission?

25 A It's not angry.

1 Q What's the emotion?

2 A Lately everything with my wife has been a huge
3 disappointment. Disappointment is the word.

4 Q Going forward would you object to your wife --
5 when this is all said and done, would you have a problem
6 with your wife taking the kids to Mississippi for a term
7 of weeks to visit their family?

8 A I don't have an objection to that, no.

9 Q You have a Sea-Doo boat?

10 A Yes.

11 Q How did you pick the value for the Sea-Doo boat
12 that you have listed on your financial affidavit?

13 A The Blue Book value.

14 Q KBB, that's where you got it from?

15 A Yes.

16 Q Who has possession of the Sea-Doo right now?

17 A It's in the marital home right now.

18 Q Okay.

19 A At least that's where I last saw it. I do not
20 know exactly where it's at.

21 Q Okay. And the kayak, is that at the marital
22 home, too?

23 A Yes.

24 Q Where did you get the value for that?

25 A Well, it's lower than the purchase price, and

1 what you do is you refer to what a similar kayak is
2 selling for. It's used. So it was an estimate. And I
3 bounced it off someone who actually owns a business that
4 sells kayaks and he said that's pretty good.

5 Q Okay. And your -- I asked you earlier but you
6 didn't answer. We took a break. Your current residence,
7 where are you living right now?

8 A I've got a home that's comparable to the one --
9 to the marital home, and it's on [REDACTED],
10 [REDACTED].

11 Q And the rent that you're paying every month on
12 that property?

13 A The rent is 2,500 a month.

14 Q Do you have a lease?

15 A Yes.

16 Q How long is the lease for?

17 A The lease is -- it was a six month lease, and it
18 will be up in December.

19 Q Okay. Do you guys have some substantial
20 personal property that's in storage? By substantial I
21 mean hundreds of pounds worth of personal property that's
22 in storage?

23 A Yes.

24 Q Okay. Where is that at?

25 A I have it in a storage place on Seminole

1 Boulevard.

2 Q Okay. How many storage units is it taking up?
3 How much stuff are we talking about?

4 A One.

5 Q How big is the unit?

6 A It's a 10 by 20.

7 Q Does your wife have access to that?

8 A No.

9 Q Do you have any other marital possessions that
10 are in any other place besides your residence, her
11 residence or the storage unit?

12 A No.

13 Q Have you transferred a lot of stuff to your
14 mother's residence?

15 A No.

16 MR. DENMON: All right. Can I just have a
17 second with my client?

18 MR. THACKER: Yeah.

19 (Whereupon, a break was had.)

20 Q Do you know a [REDACTED] [REDACTED]

21 A I think the name is [REDACTED]

22 Q How do you know [REDACTED] [REDACTED]

23 A That was a friend that my wife made because both
24 of our kids were going to a preschool at Blessed
25 Sacramento.

1 Q Were you friends with Ms. [REDACTED] as well?

2 A Initially.

3 Q Initially being that at some point you were no
4 longer friends with her?

5 A Until I discovered what her character was and
6 the fact that she helped break up another family's
7 marriage.

8 Q And how did you discover that?

9 A Well, I was informed by the person whose
10 marriage split up, a friend of ours, that she would watch
11 his kids while his wife was cheating on him.

12 Q This is another friend of yours?

13 A Yes.

14 Q And who is that friend?

15 A It's [REDACTED]

16 Q And [REDACTED] last name?

17 A I do believe it's [REDACTED] but I'm not exactly
18 sure what the spelling is.

19 Q Did [REDACTED] get mad at you for taking pictures and
20 videotaping her?

21 A I'm not sure if she got mad at me or not. I
22 don't know.

23 Q Did you take pictures of [REDACTED] or videotape her?

24 A We went out. While we were all friends I took
25 pictures of everybody. Whether she was in the pictures or

1 not -- I mean it's just a matter of when you're hanging
2 out with one family and another. Our two youngest were
3 best of buddies while they were in preschool for awhile.

4 Q Did she confront you or her husband confront you
5 because you were taking pictures and videos of her?

6 A No.

7 Q Did you threaten them and say that you knew
8 people in the Mob and you were going to bring Mob violence
9 down upon them?

10 A No.

11 Q So that relationship was teminated you're saying
12 because of you terminated it, not because she terminated
13 it?

14 A No, I didn't have the power to terminate any
15 relationship.

16 Q Is the relationship still ongoing?

17 A I don't know.

18 Q Would you be surprised to hear that she's in
19 fear of you?

20 MR. THACKER: Object to the form.

21 Answer as best you can.

22 A I find that very surprising because I have a
23 permanent scar on my face from this woman from when we
24 were playing volleyball and she, quote, accidentally hit
25 me in my face with her wedding ring. For her to have any

1 fear of me is sort of laughable. She would complain --
2 she would complain that she was almost going to be an
3 Olympic athlete, that she could beat any man swimming.
4 Yes, I'm very surprised.

5 Q Are you saying that she physically assaulted
6 you?

7 A Yes, I am, but at the time it was -- you know,
8 she exclaimed it was an accident.

9 Q So you believed her at the time?

10 A Yes.

11 Q But now you don't believe her any more?

12 A I don't know what to believe. All I know is the
13 fact that I've got a permanent scar on my face from this
14 woman.

15 Q In 2015 were you following [REDACTED] with your vehicle
16 when she had the kids in the car?

17 A (No response.)

18 Q Have you ever followed [REDACTED] with your vehicle
19 when she has the kids in another vehicle?

20 A There are multiple occasions where we follow
21 each other going places. I mean it's -- so yes.

22 Q Have you ever hit her with your -- have you ever
23 hit the vehicle she was driving with the vehicle that you
24 were driving?

25 A Yes.

1 Q When did that happen?

2 A When she stopped in the middle of the road while
3 I was turning.

4 Q Why were you following her vehicle?

5 A Because we were going home.

6 Q Where were you going home from?

7 A I don't remember.

8 Q You're saying that when you rammed her vehicle
9 or hit her vehicle that it was unintentional?

10 A Yes, it was very unintentional. Why would I hit
11 my own vehicle?

12 Q And it was her fault because she hit the brakes
13 too quick?

14 A Yes.

15 MR. DENMON: I thank you for coming in today and
16 talking to me. I don't have any other questions.
17 Your attorney may have some questions. He may not.

18 MR. THACKER: I don't have any questions. He'll
19 read, please, and we'll take a copy if it gets
20 ordered. Thank you all very much.

21 THE REPORTER: Do you need to order at this
22 time?

23 MR. DENMON: Yes, let's order it, please.

24 MR. THACKER: I'll just take a copy.

25 * * *

DEPONENT'S CERTIFICATE

I have read the foregoing transcript of my oral deposition taken on the date and at the location indicated on the title page of the deposition, and I certify that said transcript is true and correct, with the provisions that any errors appearing therein have been corrected by me by listing on a separate sheet as to page number, line and content of said error(s), and further indicating the language to be substituted.

I also understand that upon completion of the reading, signing and correcting of the transcript, I am to return this original signature page, my list of corrections and said file copy provided for my inspection to the person or company listed on the pre-addressed envelope provided to me.

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 4 OCTOBER 14, 2015, IN THE CASE OF [REDACTED] VS.
 5 [REDACTED] [REDACTED] [REDACTED] TAKEN BY SHARON RUBY.

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 7 PROCEDURE THIS IS ATTACHED FOR YOUR INSPECTION AND
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13 FOR THE RESPONDENT: JOHN THACKER, ESQ.

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23 [REDACTED] [REDACTED]

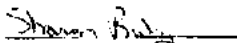
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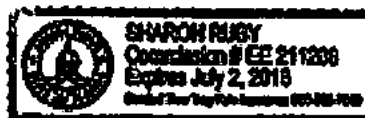
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4 I, SHARON RUBY, Court Reporter, Notary
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15 employee or attorney or counsel of any of the parties
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18 events of this action.
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IN THE CIRCUIT COURT OF THE SIXTH JUDICIAL CIRCUIT
IN AND FOR PINELLAS COUNTY, FLORIDA

CASE NO.: 15-003375-FD

Petitioner/Husband,

vs.

Respondent/Wife.

DEPONENT:

DATE: October 14, 2015

TIME: 9:00 a.m. - 12:00 p.m.

LOCATION: Parliamentary Reporting
Summit Executive Suites
15375 58th Street North
Clearwater, FL

REPORTER: Sharon Ruby
Notary Public
State of Florida at Large

APPEARANCES:

For Petitioner/Husband: JOHN S. THACKER, ESQ.
Thacker Law Group, P.A.
407 South Baring Avenue
Clearwater, FL 33756

For Respondent/Wife: CHRISTIAN DENMON, ESQ.
Denmon & Denmon
1560 W. Cleveland Street
Tampa, FL 33606

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Direct Examination by Mr. Denmon

WAS CALLED AND AFTER BEING DULY SWORN WAS EXAMINED AND
TESTIFIED AS FOLLOWS:

DIRECT EXAMINATION

BY MR. DENMON:

Q Mr. [REDACTED], how are you doing today?

A Fine, thank you.

Q My name is Christian Denmon. We've met before
briefly at another deposition, a deposition of your wife;
is that correct?

A Yes, sir.

Q Okay. And have you ever had your deposition
taken before?

A No.

Q You've seen one taken before, correct?

A Yes.

Q Okay. So you understand the deal is that I'm
going to ask you questions, right?

A Yes.

Q And then I'll need you to answer the question as
truthfully as you can, correct?

A Yes.

Q Okay. Your date of birth?

A [REDACTED].

Q And are you currently employed?

A No.

Q Are you retired?

A Yes.

Q When was the last time that you were employed?

A I retired out of the military in 2007.

Q You mean then that you haven't had any
employment since then?

A Correct.

Q Okay. Are you currently in school?

A Yes.

Q Okay. And where are you in school?

A University of South Florida.

Q Okay. Are you taking classes online or in
person?

A I have the option to do both.

Q What are you doing currently?

A I go to class, and if I cannot make it I will
view it online.

Q Okay. Are you taking a full case load right
now?

A No.

Q All right. So you're taking a partial case
load?

A Yes.

Q How many classes are you taking right now?

<p>5</p> <p>1 A Two.</p> <p>2 Q Okay. What are those classes?</p> <p>3 A The first class is engineering management.</p> <p>4 Q Okay. And the second class?</p> <p>5 A It's venture capital and private equity.</p> <p>6 Q Do you have a major or a minor?</p> <p>7 A The major that I have is civil engineering.</p> <p>8 Q Okay. How long have you been seeking a degree</p> <p>9 in civil engineering?</p> <p>10 A This degree I believe I started when I moved to</p> <p>11 this location, and that was either the second semester of</p> <p>12 2011 or the first semester of 2012.</p> <p>13 Q Have you been in school since you retired from</p> <p>14 the military?</p> <p>15 A When I first retired from the military, no.</p> <p>16 Q Okay. But eventually you started taking</p> <p>17 classes, right?</p> <p>18 A Yes.</p> <p>19 Q Okay. When was that?</p> <p>20 A I believe it was a little over six months after</p> <p>21 I retired.</p> <p>22 Q Okay. You retired in 2007, right?</p> <p>23 A Yes.</p> <p>24 Q Okay. And so when in 2007 did you retire?</p> <p>25 A In the summer.</p>	<p>7</p> <p>1 Q Do you have an expected graduation date?</p> <p>2 A Yes. I'm trying to graduate this semester.</p> <p>3 Q When you say trying, that suggests then perhaps</p> <p>4 you're not going to graduate this semester.</p> <p>5 A It's too early to determine if I'm going to meet</p> <p>6 all the requirements.</p> <p>7 Q You mean for the semester that you're currently</p> <p>8 involved in?</p> <p>9 A They have a rigorous review process before they</p> <p>10 award you the degree. I have to go before a board. They</p> <p>11 have to review the work I did.</p> <p>12 Q When is that? Do you know?</p> <p>13 A Sometime this semester.</p> <p>14 Q And should you graduate this year what are your</p> <p>15 plans for 2016?</p> <p>16 A Well, I really don't know. That depends on</p> <p>17 what's going to happen with the current divorce situation</p> <p>18 and the custody of the kids.</p> <p>19 Q So what do you mean?</p> <p>20 A I don't know. It depends on what's going to</p> <p>21 happen with the family situation.</p> <p>22 Q You mean how many overnights you end up with the</p> <p>23 children?</p> <p>24 A That is one factor, yes.</p> <p>25 Q What are the other factors?</p>
<p>6</p> <p>1 Q Okay. So somewhere around the beginning of 2008</p> <p>2 is when you started taking classes; is that right?</p> <p>3 A Yes.</p> <p>4 Q Okay. And have you been enrolled in taking</p> <p>5 classes ever since then?</p> <p>6 A Not continuously.</p> <p>7 Q When did you have breaks?</p> <p>8 A I had to take a semester off after my wife had a</p> <p>9 really bad injury giving birth to our youngest child. She</p> <p>10 was unable to take care of herself or the family, and we</p> <p>11 had to have help from many people and I had to take a</p> <p>12 semester off.</p> <p>13 Q Any other lapses in your education?</p> <p>14 A I don't know for sure if I can call them lapses,</p> <p>15 but I believe not, but I don't know for sure.</p> <p>16 Q Okay. Do you have any degrees from this</p> <p>17 additional schooling after you retired?</p> <p>18 A Yes.</p> <p>19 Q Okay. What are your degrees in?</p> <p>20 A I got a Bachelor's in civil engineering.</p> <p>21 Q And when was that?</p> <p>22 A It was December of 2011.</p> <p>23 Q Are you currently seeking a Master's in civil</p> <p>24 engineering?</p> <p>25 A Yes.</p>	<p>8</p> <p>1 A Well, I'm not sure what the other factors are,</p> <p>2 but that's the primary one.</p> <p>3 Q What's the time sharing that you're seeking?</p> <p>4 A I want to get as much time as I can get.</p> <p>5 Q Do you have any specifics about that?</p> <p>6 A I want to get as much time as I can get with the</p> <p>7 kids.</p> <p>8 Q If you had your way and you went in front of the</p> <p>9 judge asking for as much time as you can, what would that</p> <p>10 mean specifically?</p> <p>11 A Well, isn't that up to the judge to decide?</p> <p>12 Q Yeah, but what do you want?</p> <p>13 A That's what I'm saying, I want as much time as I</p> <p>14 can get with the kids.</p> <p>15 Q And if you get what you want, how will that</p> <p>16 affect your future employment?</p> <p>17 A I really don't know.</p> <p>18 Q Okay. If you don't get much time with the</p> <p>19 children, how will that affect what you're going to do</p> <p>20 come 2016?</p> <p>21 MR. THACHER: I'll object to the form.</p> <p>22 Go ahead and answer as best you can.</p> <p>23 A Once again it's too early to tell. I don't</p> <p>24 know.</p> <p>25 Q Okay. Do you get a stipend from the Government</p>

1 for attending school?

2 A I do.

3 Q What is the amount that you get from the
4 Government for attending school?

5 A Well, it varies depending on the course load
6 that you take.

7 Q Okay. Right now you're taking two classes,
8 right?

9 A Right.

10 Q What do you get on a monthly basis right now
11 from the Government?

12 A Well, I'm probably going to have to refer to my
13 financial affidavit to give you an exact number. I forgot
14 my glasses.

15 MR. THACKER: He needs his glasses. Can we go
16 off the record for a minute?

17 MR. DENMON: Of course.

18 (Whereupon, a break was taken.)

19 Q It doesn't appear that you have it listed with a
20 value on your financial affidavit, does it?

21 A Actually you're correct, because I think what
22 was relayed was the fact that since it was considered part
23 of school and nontaxable that it wouldn't be part of my
24 declaration.

25 Q And by relayed what do you mean by that? When

1 you were working on your financial affidavit, your
2 understanding is that it wasn't to be included on your
3 financial affidavit, the amount?

4 A That is correct.

5 Q Okay. You don't know the exact number that you
6 get on a monthly basis right now?

7 A No, but I can give a rough estimate.

8 Q What's your rough estimate?

9 A It's around -- if I'm going like I am, which is
10 considered two classes, that's two-third of graduate
11 full-time, it's around a thousand.

12 Q Okay.

13 A And it only counts for when school is in
14 session. So any day school is not in session it doesn't
15 count. So I don't get paid over breaks, over summer.

16 Q And when you say a thousand, you mean a thousand
17 for the semester or a thousand a month?

18 A A month.

19 Q Okay.

20 A And that's, you know, to cover the costs that
21 you would -- additional costs for school and it's supposed
22 to help a little with your housing.

23 Q Okay. And so if you turn to page three of your
24 financial affidavit and you go to line 27 where it says
25 present net monthly income, it's near the top --

1 A Uh-huh.

2 Q -- it appears you put in some bold letters with
3 an asterisk that you receive a stipend for any month
4 you're enrolled as a full-time student.

5 A Okay, yeah.

6 Q That is not exactly true. You get a stipend if
7 you're a part-time student as well, right?

8 A Well, you have to be -- you have to be over half
9 time in order to get anything. If I took one class, I
10 would not get a stipend.

11 Q Okay. Have you taken one class in any of the
12 last eight years that you've been in school?

13 A I'm not sure, but off the top of my head I would
14 say, no, I've always taken at least two.

15 Q Do you anticipate you're going to go back into
16 the workforce?

17 A At this point in time I'm not sure what to
18 expect.

19 Q Okay.

20 A Whatever the family situation dictates.

21 Q So your decision whether or not to go back into
22 the workforce will be based on your family --

23 A Yes.

24 Q -- decisions? Okay. Are you currently being
25 treated by a doctor for any physical ailments?

1 A I'm not sure what you mean by being treated.

2 Q Do you have a doctor?

3 A Yes, I have a doctor.

4 Q Okay. Do you see a doctor for anything in
5 particular?

6 A I have a primary care monitor at MacDill Air
7 Force Base, and she refers me to doctors on an as needed
8 basis.

9 Q Has she referred you to any mental health
10 counselors or doctors?

11 A No.

12 Q Are you currently on any medication?

13 A Yes.

14 Q Okay. What are you currently on medication for?

15 A I'm on medication for low thyroid.

16 Q Okay.

17 A And then I take a medication for allergies and
18 medication for low testosterone and for -- I don't know
19 how you say this -- reflux, you know.

20 Q Okay. Have you ever been diagnosed with any
21 mental health disorders?

22 A Never.

23 Q Okay. Do you take any medication to help you
24 with your mental health for depression or anything like
25 that?

1 A No.

2 Q Are you currently in any personal therapy?

3 A No.

4 Q Okay.

5 A Therapy? Could you be more specific, please.

6 Q Would you say that you're currently in any

7 treatment or any therapy with any psychologist or any

8 doctor like that?

9 A No. However, we are currently having a custody

10 evaluation by Dr. [REDACTED] I'm not sure if that would

11 qualify.

12 Q Okay. During the marriage who handled the

13 finances?

14 A Well, we had an agreement on everything and --

15 Q What was the agreement?

16 A Well, most of the stuff I would handle and she

17 would -- you know, she'd have her finances, too. You

18 know, she'd do shopping and contribute to the decisions,

19 you know, financial decisions. She had access to

20 everything. There was no secrets.

21 Q Okay. So during the marriage you said most of

22 the financial stuff you would handle; is that right?

23 A Yes. I would pay bills. I would -- investments

24 after consulting with my wife.

25 Q Okay. You had an arrangement where you said

1 that you would handle the bills and the money and that she

2 would handle the kids, correct?

3 A No, that is incorrect.

4 Q Okay. So it wasn't her responsibility to handle

5 the children during the marriage?

6 A No. She would help.

7 Q She would help you?

8 A It was a cooperative effort. Anything that

9 needed to be done for the better of the family, you know,

10 one of us would pick it up.

11 Q Okay. When you guys were still in the same

12 house together, who took the kids to school in the

13 morning?

14 A What time frame are you talking about?

15 Q The last year that you guys were together.

16 A Okay. The last year. So that would be

17 April 2014 to April 2015. Okay. She took them the

18 majority of the time to school.

19 Q Okay. Who would pick the kids up from school?

20 A Well, again, we would have help sometimes. I

21 believe [REDACTED] helped pick up the kids; my

22 mother, [REDACTED] my father, [REDACTED] myself.

23 Q Who picked up the kids most of the time?

24 A Most of the time it would be my wife.

25 Q Okay. Who did the grocery shopping for the

1 household?

2 A We both did.

3 Q Okay. Did you guys share in that duty equally,

4 or did your wife do it most of the time?

5 A It varied for what the need was. If I was in

6 Tampa and she was busy doing something else, I would take

7 care of it. If she was going there, then she would take

8 care of it, because we would go to the base to get lower

9 prices on groceries.

10 Q When you say when you were in Tampa, because you

11 were at school?

12 A Yes.

13 Q Okay. And if you were taking a full-time load,

14 were you at school every day of the week?

15 A No.

16 Q Okay. Were you at school three days a week?

17 A Sometimes, yes.

18 Q Okay. You mentioned your parents. They would

19 help with picking up the children --

20 A Yes.

21 Q -- is that right? How often did they do that

22 during the last year of the intact marriage?

23 A Well, not often because my wife all of a sudden

24 did not want my kids to associate with my parents, their

25 grandparents. She tried to cut them out of their lives.

1 Q Well, you just mentioned them as picking up the

2 kids. So if it's not often --

3 A That's right, it wasn't often.

4 Q And how often is not often?

5 A I cannot put an exact number on it. I would

6 have to do research.

7 Q Is it less than five?

8 A There were situations when neither one of us

9 could pick them up, so my parents did it.

10 Q Okay. Was it less than five?

11 A Again, I would have to research it.

12 Q Okay. Can you tell me if it was more than once

13 in the last year?

14 A Again, I know they did it once for sure.

15 Q What about the year before?

16 A Well, the year before was similar to the year

17 that you mentioned before the separation.

18 Q Okay. So we're talking what, 2013 to 2014?

19 A Yeah, it was a period of two years where she

20 tried to isolate my kids from their grandparents.

21 Q Why do you think that happened?

22 A I don't know for sure, but some of the theories

23 are my wife has a traumatic brain injury and she does not

24 take the medicine as prescribed. I think her thinking is

25 clouded.

1 Q How is your relationship with your oldest child?

2 A My relationship with my oldest child is great up

3 unto --

4 Q How is it right now?

5 A Now?

6 Q Yes.

7 A He avoids speaking to me.

8 Q Okay. When did that start happening?

9 A I really don't have an exact date. I think it

10 was -- it coincides with the separation.

11 Q Okay. Does it coincide with you getting into a

12 physical altercation with him?

13 A No.

14 Q Did you get into a physical altercation with

15 your son?

16 A As far as physical altercation goes, there is --

17 I'm not sure exactly what you're trying to get at.

18 Q Did you hit your son?

19 MR. THACKER: Objection. Don't answer it.

20 Q Have you ever hit any of your children?

21 MR. THACKER: Wait, wait, wait, wait. There is

22 only three children now, three minor children. So is

23 your question directed just to the three minor

24 children or all four of his children? Just so that

25 I'm clear.

1 Q Have you ever hit any of your four children?

2 MR. THACKER: I'm going to object and instruct

3 him to invoke the Fifth Amendment. Don't answer.

4 Q Do you believe in corporal punishment?

5 A Well, it's funny that you mention that to me,

6 because I was informed by a police officer that a parent

7 can use corporal punishment until a child is 18 years old.

8 Q Do you believe in corporal punishment?

9 A There are times when children probably should

10 get a little spanking, so yes.

11 Q When is the last time that you spanked one of

12 your children?

13 A I can't remember. It's been a long time.

14 Q Okay. Have you spanked any of your children?

15 A Yes.

16 Q Have you poked [REDACTED] before in the chest and

17 pushed him around?

18 A No.

19 MR. THACKER: Object.

20 Q Have you called your children stupid punks

21 before?

22 A The way you phrased that, no.

23 Q Have you used derogatory terms like stupid punk

24 to your children before?

25 MR. THACKER: Object to the form.

1 Answer as best you can.

2 A Okay. With the way that my oldest son was

3 acting, I did tell him once that he was acting like a

4 punk.

5 Q Okay. When was that?

6 A I don't know the exact date.

7 Q Have you called your children dumbass before?

8 A I can't recall.

9 Q Have you called your children idiots before?

10 A I can't recall. I correct them if they even

11 bring it up.

12 Q Have you called your children pieces of shit

13 before?

14 A Again, I don't think I'd ever say something like

15 that.

16 Q Okay. But you're not sure?

17 A I know for a fact my three youngest, no.

18 Q Potentially the oldest; is that right?

19 A The oldest is very problematic lately since he

20 has stopped taking his ADHD medicines. He has been

21 defiant. He has been unable to control his impulses.

22 Q So you're saying that your oldest has a

23 psychological problem?

24 A Yes. I'm concerned about him and concerned

25 about the other children being around him.

1 Q A problem that causes him to take medicine?

2 A He has been on ADHD medicines for over ten

3 years.

4 Q Okay. And your response to him being off

5 medicine is to call him stupid punk, idiot, dumbass or

6 piece of shit?

7 MR. THACKER: Objection to form.

8 Answer as best you can.

9 A No, that is not my response.

10 Q Your response is to get physically violent with

11 him?

12 A No, that is not my response.

13 Q Do you use physical violence to control people

14 if you can't get them to do what you want?

15 A No.

16 Q Have you ever used physical violence against

17 your wife?

18 A No.

19 Q Your wife hasn't gone to the emergency room in

20 late 2013 because you stepped on her chest?

21 MR. THACKER: Object to the form.

22 Answer as best you can.

23 A I never stepped on her chest.

24 Q Okay. Did you physically assault your wife in

25 late 2013 causing her to take a trip to the emergency

1 room?

2 MR. THACKER: Object to the form.

3 Answer as best you can.

4 A No, I never hurt my wife.

5 Q Did you force yourself sexually atop your wife

6 in February of 2013?

7 A No.

8 Q You never sexually assaulted your wife?

9 A No.

10 Q Are you taking Viagra?

11 A No.

12 Q Cialis?

13 A At times.

14 Q Okay. You didn't mention that when we were

15 talking about your scripts. Anything else that you didn't

16 mention?

17 A No, I did mention it. That is a low T

18 prescription. I did mention it. I didn't give specific

19 names of the medications.

20 Q Okay. So for your low testosterone you take

21 Cialis; is that correct?

22 A Yes.

23 Q Are you also taking the hormone testosterone?

24 A Yes.

25 Q Okay. Are there any other hormones that you're

1 taking for your low T?

2 A Oh, wait. I need to correct that.

3 Q Okay.

4 A There was a time when I was given a medicine for

5 an estrogen spike.

6 Q When was that?

7 A I'm not sure, but it was -- you know, there are

8 some theories about it. My wife who's got a prescription

9 for estrogen cream, Premarin, might have had an effect

10 upon it.

11 Q Might have affected your estrogen level?

12 A Might have caused a spike in my laboratories.

13 Q Okay. How often do you get your hormonal

14 profile done by a doctor?

15 A Whenever the doctor orders it.

16 Q Okay. Does it happen a lot?

17 A I'm not sure what you mean by a lot.

18 Q When is the last time it happened?

19 A Probably over six months ago.

20 Q Okay. When was the last time --

21 A But I'm not exactly sure of the date.

22 Q Okay. Sometime over six months ago, correct?

23 A Something like that.

24 Q When was the last time it happened before that?

25 A Once again I'd probably have to refer to the

1 medical records.

2 Q Okay. Have you ever punched your wife in the

3 mouth?

4 A No.

5 Q Have you ever caused her to have a bloody lip?

6 A No.

7 Q You never caused her to have a bloody lip that

8 also caused her to go to the doctor's?

9 A No.

10 Q Okay.

11 A Let me say something.

12 Q Sure.

13 A My wife does have a problem with bruxism, and

14 this can be validated by Dr. [REDACTED] the family dentist.

15 She has to wear a mouthpiece at night in her mouth.

16 Q Okay. Are you suggesting then if your wife had

17 a bloody lip that caused her to go to the hospital that it

18 was associated with the bruxism?

19 A I'm not suggesting -- what I'm suggesting is she

20 puts some mouthpiece in her mouth every night.

21 Q Okay.

22 A And she has this thing where she's got

23 uncontrollable grinding of her teeth while she's sleeping.

24 That's bruxism. I had to look it up. I asked her over

25 and again why are you wearing a mouthpiece every night,

1 and that is most likely another symptom of her brain

2 injury.

3 Q Okay. And how is that related to my question

4 about whether or not you punched her in the mouth?

5 A I never did.

6 Q Okay. Did your wife go to the emergency room in

7 late 2013?

8 A I do not know.

9 Q Were you living with your wife in late 2013?

10 A Yes.

11 Q And you can't remember if she went to the

12 emergency room or not?

13 A I took her to the emergency room once in 2013.

14 Q Okay. Why?

15 A She had trouble breathing. I believe it was in

16 May of 2013.

17 Q Okay. Do you know why she had trouble

18 breathing?

19 A I think the final diagnosis was something like

20 pleurisy.

21 Q It was not related to anything physical that you

22 did to her?

23 A No.

24 Q How old is [REDACTED] now?

25 A Eighteen.

1 Q Has [REDACTED] ever walked in on you naked in front of
2 your computer looking at pornography?
3 A No.
4 Q Did you have to take [REDACTED] to court for a
5 deposition before?
6 A Yes.
7 Q What happened with that? How did you guys end
8 up in court for a deposition?
9 A Okay. He walked in on a pool boy inside the
10 house who was playing with my wife's underwear, and from
11 what I gather he actually took a piece with him. And when
12 my son walked in on him he went to his room. And that's
13 why he was subject to a deposition.
14 Q When your son walked in on the pool boy, your
15 son then walked into his room?
16 A That's what he states.
17 Q Okay. So this pool boy, he was in trouble for a
18 break-in; is that right?
19 A Yes.
20 Q Okay. And so you had to go in front of the
21 judge based on that; is that right?
22 A Actually, no, I didn't have to go in front of a
23 judge based upon a break-in. That's your question,
24 correct?
25 Q Yes. Did you have to go in front of a judge?

1 A Yes.
2 Q Why?
3 A When I went to take my son for a deposition the
4 lawyer wanted to question him alone and he was still a
5 minor. So I turned around and asked the person, the
6 lawyer who was appointed to us by the Government, is this
7 a proper process, can they take my son who is a minor.
8 And, anyways, while I'm asking the guy the
9 question, the defense attorney for the person who broke in
10 the home left. Then he turns around and says that I
11 obstructed his ability to take questions from my son. So
12 I got a notice to show. I think that's the correct term.
13 MR. THACKER: Just answer as best you can.
14 A A notice to show and -- anyways, when I showed
15 up the lawyer basically stated that he was wrong in the
16 procedures that he was about to undertake; he should have
17 had a video surveillance there; and there was also
18 supposed to be a representative that would accompany my
19 son doing the questioning. That stuff wasn't in place, so
20 it was dropped.
21 Q This was in 2012?
22 A I'm not sure actually. It was -- it was when I
23 first -- I'm not sure of the exact dates because it got
24 drug out from when it happened and when there was actual
25 court times. I'd have to refer to documents.

1 Q Was this in Pinellas County, Florida?
2 A Yes, it was.
3 Q Okay. Do you remember the last name of the
4 Defendant in the case?
5 A It was [REDACTED]
6 Q [REDACTED]?
7 A That sounds about right.
8 Q Do you remember the first name of the Defendant
9 in the case?
10 A I think it was [REDACTED]
11 Q Is [REDACTED] currently on any medicine?
12 A Yes.
13 Q What kind of medicine?
14 A Well, he's taking a Vitamin D cream, a multi
15 vitamin, and then he's on something called Celcept, which
16 is an immunosuppressant drug. And he's also supposed to
17 receive light treatments, ultraviolet, on the areas that
18 are affected, his scalp and face.
19 Q What is the medical condition that [REDACTED] has?
20 A He has an autoimmune disorder, which the
21 technical term is called Morpheus En Crap de Sabre.
22 Q Who is his treating doctor?
23 A Dr. [REDACTED]
24 Q Is Dr. [REDACTED] his pediatrician or a
25 specialist?

1 A She's a specialist in dermatology.
2 Q How often does [REDACTED] need to take that medicine,
3 that Celcept?
4 A The current regime is two times a day.
5 Q Do you make sure that [REDACTED] gets his Celcept?
6 A Oh, I do.
7 Q Have you told him that it's his responsibility
8 to take his medicine and not your responsibility to make
9 sure he takes it?
10 A I try to have him take responsibility for
11 everything he does. However, I verify every time whether
12 he takes it or not.
13 Q So he takes it every time?
14 A I'm not saying he takes it every time. There
15 has been times ever since he's been on the medication that
16 he hasn't taken it every time, and this goes back to the
17 Methotrexate that he was prescribed, too. So of course
18 you're going to miss a dose if you have -- if you're
19 required to take two doses a day.
20 Q Did he miss doses when you guys were in Key West
21 earlier this year?
22 A I am not sure if he missed a dose. I know he
23 took the medications. I had a problem. My wife seems to
24 count out medicines for the bottle. She takes medicines
25 in and out of the bottle. So it was hard to determine if

1 she put in the right number or not. I don't know what
2 she's doing with the other medicines, but the medicine
3 should stay in the bottle when there -- when it's
4 prescribed and it should be, you know, administered out of
5 that bottle. As far as -- I have a problem with her
6 giving me a bottle that has only two pills when she drops
7 him off.

8 Q So you don't know if he took all of his doses --

9 A For the Friday night because -- anyways --

10 Q When you were in Key West you have no idea if he
11 took all the medicine he was supposed to take?

12 A I know he took medicine every day when we were
13 there.

14 Q How old is [REDACTED]?

15 A [REDACTED] is now nine years old.

16 Q Have you thought about taking any classes for
17 domestic violence?

18 MR. THACKER: Object to the form.

19 Answer as best you can.

20 A No.

21 Q Do you think there is anything that maybe you
22 need some help with in regards to anger management?

23 A No.

24 Q Okay. How are the other children doing?

25 A Well, the other children are having problems

1 with the divorce. The three youngest is what you're
2 referring to?

3 Q Uh-huh.

4 A Each one of them exhibits different behaviors
5 that I did not observe while I was living in the home.

6 Q Do you think that any of them have issues that
7 need to be helped with counseling?

8 A Yes.

9 Q Okay. All the children?

10 A All three, yes.

11 Q Okay.

12 A The divorce is difficult. It was relayed to me
13 that it's more difficult on the kids than you can imagine.
14 So, yes, I would like to get help for them.

15 Q Do you think [REDACTED] should be in counseling as
16 well?

17 A Yes.

18 Q Okay. Do you think [REDACTED] should be in counseling,
19 the oldest?

20 A Yes.

21 Q Do you think you should be in counseling?

22 A No.

23 Q Do you think your parents think or do you think
24 your children think that you're a good dad?

25 A Yes.

1 MR. THACKER: Object to the form.

2 Answer as best you can. You just answered?

3 THE DEPENDENT: Yes.

4 Q Do you think if they were asked they would say
5 you're a good dad?

6 MR. THACKER: Same objection.

7 Answer as best you can.

8 A Yes.

9 Q Do you think that you're a good dad?

10 A Yes.

11 Q Do you think my client, [REDACTED] is a good mom?

12 A No.

13 Q Okay. Have you always thought that she's not a
14 good mom?

15 A No.

16 Q Why do you think she's not a good mom?

17 A I think something is happening to her. She
18 doesn't have the ability to process things properly and I
19 think it's related to her brain damage.

20 Q Okay. When did you start thinking this?

21 MR. THACKER: For the record I want to make sure
22 he was finished with his prior answer. I think he
23 had some things -- I'm not suggesting he does, but
24 were you finished, David?

25 THE DEPENDENT: Well, no, I wasn't.

1 MR. THACKER: Okay. Then can he finish his
2 answer before you ask another question?

3 MR. DENMON: Yes.

4 A I'm trying to remember where I left off now. As
5 far as she -- she has done things that have me concerned.

6 Q When was the last time that she did something
7 that had you concerned?

8 A Okay. Last week she did not give me permission
9 to take my kids to see a child psychologist.

10 Q You guys are having an issue trying to get an
11 agreed upon psychologist; is that right?

12 A That is no longer an issue. We have an agreed
13 upon child psychologist.

14 Q Okay. So what was the problem last week?

15 A I wanted to pick my son up after school and she
16 informed me that I needed to cancel the appointment.

17 Q Okay. What day did you want to pick up your kid
18 after school?

19 A Thursday.

20 Q Okay. Do you have time sharing right now with
21 your temporary time sharing plan on Thursday?

22 A The plan allows for her to agree to any time of
23 the week as needed.

24 Q Okay. What's the time that you have regardless
25 of whether or not she agrees or not?

1 A I pick them up after school Friday --
 2 Q Uh-huh.
 3 A -- and I drop them off Saturday at seven.
 4 Q Okay. Thursday you wanted to pick up which
 5 child?
 6 A [REDACTED]
 7 Q Okay. When was the last time that you had asked
 8 to pick up [REDACTED] during the week?
 9 A I previously asked to have the kids the
 10 Thursday -- I'm not sure. It might have been two, three
 11 weeks prior -- to pick up all three kids, and [REDACTED] was
 12 included, and have them spend the night, Thursday night,
 13 and then I would take them to Dr. [REDACTED]'s office in
 14 the morning.
 15 Q Okay. And this Thursday that you asked to see
 16 [REDACTED] you wanted to pick him up after school, right?
 17 A Yes.
 18 Q Okay. Did [REDACTED] have an appointment with this
 19 psychologist that we're talking about?
 20 A I'm not sure if he had appointments. Ever since
 21 the separation my wife has taken it upon herself to not
 22 inform me of any appointments that are made for my kids,
 23 any social events. She has tried to cut me out of their
 24 lives in every way possible.
 25 Q You're asking to pick up the kids when

1 they're -- when the kids have to go see either
 2 Dr. [REDACTED] or they have to see a counselor, correct?
 3 A That is not the only time but --
 4 Q Well, that's when you want to pick them up,
 5 right? --
 6 A No. I have --
 7 Q -- because you want to be able to be the one
 8 that drives them to go see the doctor, right?
 9 A Can I speak, please?
 10 MR. THACKER: We can't talk over each other.
 11 A I have requested multiple --
 12 MR. THACKER: Wait a second, [REDACTED]
 13 Are you trying to answer a prior question?
 14 THE DEPENDENT: Okay.
 15 MR. THACKER: Answer my question, please, so the
 16 record is clear. Are you trying to finish answering
 17 the prior question?
 18 THE DEPENDENT: I was trying to answer a
 19 question, yes.
 20 MR. THACKER: Can we identify what question he
 21 was trying to answer, let him finish and then ask a
 22 follow-up? Is that all right?
 23 MR. DENNON: Sure.
 24 MR. THACKER: What question were you trying to
 25 finish answering?

1 THE DEPENDENT: It's going to have to be
 2 restated.
 3 MR. THACKER: Okay. Then why don't we just move
 4 on to a new question, okay. Just answer the new
 5 question. You have the right to read the errata
 6 sheet on this depo if you need to, okay. Is that all
 7 right, Chris?
 8 MR. DENNON: Yeah.
 9 MR. THACKER: Okay.
 10 Q You're asking [REDACTED] for extra time to pick up the
 11 children because you want to be the parent that drives the
 12 kids to the counseling meeting with the doctor, right?
 13 A There is an agreement to where we're supposed to
 14 have 50/50. I'm trying to honor the agreement to where
 15 the parents will take them 50 percent of the time to see
 16 each person.
 17 Q The yes or no question that I asked you is that
 18 you're asking [REDACTED] -- you asked [REDACTED] to pick up the kids
 19 during the week so you can be the parent that drives the
 20 kids to their -- to either Dr. [REDACTED] or to a
 21 counselor; is that right?
 22 A Yes, I did ask to pick up the kids to take them
 23 to these appointments.
 24 Q I see you have a copy of your financial
 25 affidavit in front of you; is that right?

1 A Yes.
 2 Q Okay. And this is that financial affidavit that
 3 you filed with the Court on June -- or notarized on
 4 June 18, 2015; is that right? That would be on the second
 5 to last page of your affidavit.
 6 A Yes.
 7 Q Okay. If you could turn to the second page of
 8 your affidavit. Number 11, monthly rental income, you
 9 have as a negative number. It's negative 872.91.
 10 A Yes.
 11 Q I know that you've attached this page to the
 12 very back of your affidavit. It's titled rental income.
 13 A Yes.
 14 Q Okay. Who is receiving that monthly rent right
 15 now? Is that going to you or is it going to [REDACTED]
 16 A It's going to the account that I use to pay the
 17 mortgage for the property, and the account is now in my
 18 name.
 19 Q Is that the Wells Fargo account?
 20 A It is.
 21 Q Okay. So it's going to you, right?
 22 A Yes. I manage the property.
 23 Q Okay. The mortgage that you're paying every
 24 month is less than the amount of money that you're
 25 receiving in rent, correct?

1 A Yes.

2 Q Okay. You have a \$1,035 in repairs that's

3 listed on this little itemization here. How did you come

4 to that number?

5 A The home is old --

6 Q Okay.

7 A -- and it needs lots of repairs.

8 Q Okay.

9 A There are numerous things that had to be done,

10 including, you know, repairing rotted wood, parts -- you

11 know, the roof, you know, water heater, I believe. I

12 think it's the water heater. Yeah. Anyway, it was vacant

13 for five months also and it just required a lot of -- a

14 lot of work.

15 Q When did you put this work into the home?

16 A I was there over the summer of 2014.

17 Q How long were you there over the summer of 2014?

18 A I don't know the specific time frame.

19 Q Was it more than a week?

20 A Yes.

21 Q Was it more than two weeks?

22 A Yes.

23 Q Was it more than three weeks?

24 A Yes.

25 Q Was it more than four weeks?

1 A Maybe. That's where I'm not sure. I mean --

2 Q So maybe more than four weeks. Was it maybe

3 more than five weeks?

4 A Again, I'll have to refer to my records.

5 Q Okay. Where was [REDACTED] when you were in Virginia

6 in the summer of 2014?

7 A I'm not sure exactly where she was the whole

8 time.

9 Q Was she in Virginia?

10 A No. I asked the family to go with me and help

11 me and she refused.

12 Q Okay. Where were the children? Were they with

13 you or were they with her?

14 A They were with her.

15 Q Okay. So for a month in 2014 you left [REDACTED] alone

16 with the children, right?

17 A Yes.

18 Q Okay. Did you have concerns about [REDACTED] mental

19 health in the summer of 2014?

20 A Yes.

21 Q Okay. So you had concerns about her mental

22 health and how she would handle the children, correct?

23 A It has been a concern of mine ever since May of

24 2013.

25 Q Since May of 2013?

1 A Yes.

2 Q Okay. But you left [REDACTED] alone for at least a

3 month with the children while you went to another state,

4 correct?

5 A Yes.

6 Q Okay. Did you ultimately get this rental home

7 fixed up to your satisfaction?

8 A My satisfaction, no.

9 Q Okay. Did you ultimately get it fixed up so

10 that it could be rented?

11 A Yes.

12 Q Ultimately so it could be rented at just a shade

13 under \$3,000 a month, right?

14 A Yes.

15 Q Okay. The total amount of money that you put

16 into that home in the summer of 2014, do you know what

17 that number was?

18 A The exact number?

19 Q Correct.

20 A No --

21 Q Do you know an estimate?

22 A -- not off the top of my head.

23 Q Do you have an estimate?

24 A I know it was over \$12,000, maybe higher.

25 Q And do you know which of your accounts the money

1 came from that went into fixing up the home?

2 A There are -- no, I don't know exactly which

3 accounts.

4 Q Have you had to put any money into that rental

5 home since the summer of 2014?

6 A Yes.

7 Q How much have you had to put in?

8 A It's been thousands.

9 Q How many thousands?

10 A Rough estimate -- I can't give you precise -- I

11 still owe some money to people fixing it. It will go

12 easily above 3,000, maybe 4,000.

13 Q When was the last time that you put money --

14 what was the last repair that you guys did on the rental

15 property?

16 A Yesterday.

17 Q Okay. What was the repair?

18 A A faucet had to be replaced that was leaking and

19 then a toilet had to be replaced that cracked. And that

20 was substantial man hours involved.

21 Q Who did it?

22 A I have people that do it. I have someone that

23 helps manage and he just figures out who will do what.

24 Q What did he charge you for this repair?

25 A It varies. I haven't got a formal bill from him

1 yet.

2 Q What was the last repair that you had done on

3 the rental property before yesterday?

4 A There was a problem with the furnace, and that

5 still needs to be resolved and I still need to pay that

6 bill, too.

7 Q So it's been fixed or it hasn't been fixed, the

8 furnace?

9 A It's got to be inspected because it's a gas

10 furnace.

11 Q Okay. That's a pending future problem you

12 think, right?

13 A I hope not. It has to be taken care of

14 because --

15 Q Because it's gas, right?

16 A We're responsible to provide a good home.

17 Q Okay. What was the last repair, though, before

18 yesterday?

19 A That was the replacement of the toilet that I

20 alluded to.

21 Q And the last repair before replacing the toilet?

22 A That was the furnace --

23 Q Which hasn't been --

24 A -- the gas supply and it's -- I don't know the

25 specifics of it, but that is something that needs to be

1 taken care of.

2 Q Okay. Between the summer of 2014 and yesterday

3 what are the repairs that you had to do to the house?

4 A Okay. We had a problem with water getting into

5 the home. There was some bad rains, so it actually

6 flooded the crawl space and I had to have -- I had to have

7 them go in with special equipment to dry it out. As far

8 as the specifics, you know, it took quite some time to do

9 that and it was taken care of, but they had to do

10 modifications to the drainage of the gutters coming off of

11 the house. And it was just because of extreme rains,

12 unprecedented. So that caused a problem.

13 Q Anything else?

14 A There was lots of yardwork that needed to be

15 done.

16 Q Did you include that in your maintenance?

17 A Yes, yardwork is maintenance.

18 Q Okay.

19 A I had to purchase supplies to do the yardwork.

20 I had to purchase a new lawn mower because the home was

21 vacant. So I had to provide a lawn mower for someone to

22 do the yard.

23 Q In 2014 you mean?

24 A Yes. You're talking about the time frame from

25 the summer --

1 Q Yes.

2 A Yes, it was during that time frame.

3 Q Okay. So you had to fix the yard up and you had

4 a flooding issue, right?

5 A No. Actually the flooding was inside of the

6 crawl space of the home.

7 Q Okay. Anything else between 2014 and yesterday?

8 A There was some more things, but I can't recall

9 everything.

10 Q And do these bills get paid out of different

11 accounts or do they always get paid out of the same

12 account?

13 A Normally I try to keep it to the same account.

14 However, I don't know for sure exactly how every bill was

15 paid. I do pay sometimes in cash and I did that quite

16 often when I was there to pay people doing work and I paid

17 them cash.

18 Q Okay. How long are the tenants going to

19 continue to be in this property? How long is the lease

20 for?

21 A It is a three year term, and that should be like

22 December 2014 to three years later, 2017.

23 Q Are they good tenants?

24 A So far I have no complaints.

25 Q Okay. Have you thought about what you want to

1 do with this -- if you had your way what you would do with

2 this rental property in the divorce?

3 A Well, once again it's too early to determine

4 anything with my family situation or our assets.

5 Q Okay. So you haven't really thought about it

6 yet what you want to do with this?

7 A No.

8 Q Okay. What about the marital home?

9 A Same.

10 Q Don't know yet?

11 A Don't know.

12 Q Okay. Have you had a chance to talk to your

13 sister about her coming over to the marital home a couple

14 weeks ago and causing a scene?

15 MR. TRACKER: Object to the form.

16 Answer as best you can.

17 A Yes.

18 Q And what's your understanding of what happened?

19 MR. TRACKER: Object to the form.

20 Answer as best you can.

21 A From what I understand my sister -- I didn't

22 think much about it because my daughter wanted to get a

23 certain bathing suit to wear. So she says, okay, on the

24 way to the pool I will stop off at the house and have

25 just go in the house and get her bathing suit. And, oh,

1 by the way, [REDACTED] wants a different bathing suit, too. So
2 she went to the house. The front door was locked and my
3 wife came out yelling at her saying what are you doing
4 here on my property. I believe my wife also stated that I
5 hope I never see you again.

6 Q And is that when your sister starting screaming
7 at your wife and flipped her the bird?

8 MR. THACKER: Object to the form.

9 Answer as best you can.

10 A I wasn't there to witness it. However, I'm just
11 telling you what I was told.

12 Q From your sister?

13 A And her daughter. Her daughter was there, too,
14 along with my daughter.

15 Q Your sister's daughter?

16 A Yes.

17 Q Did you talk to your sister about how maybe
18 that's just not a good thing to have happen out in public?

19 A My sister is one of the meekest people around.
20 She is a grade school teacher. She is very controlled,
21 very nice. This whole thing shocks me. So obviously she
22 was -- if she did do something she was provoked.

23 Q So if your sister was flipping the bird in the
24 middle of the road it was [REDACTED] fault, right?

25 MR. THACKER: Object to the form.

1 Answer the question as best you can.

2 A I don't think -- I really don't have an answer
3 for that.

4 Q There was an incident a couple of months ago
5 where you were -- I guess you had a flat tire out in front
6 of the marital home; is that right?

7 A Yes.

8 Q Okay. Tell me what happened.

9 A Well, driving to the house there was no problem
10 with my vehicle, and then I went and pulled in the
11 driveway. As far as the vehicle is concerned, I turned
12 around and I backed out of the driveway and I sort of
13 heard a click noise. I was going to visit my friend right
14 across the street, but then I was concentrating on the
15 click. So I drove further down the street and it just
16 kept -- it kept occurring.

17 So I got out of the vehicle, looked, and there
18 was a nail in my left rear tire. So then when I'm looking
19 at it it's like, oh, boy, if I pull it out I'll get a
20 flat, if I drive it I'll get a flat. So I called AAA to
21 come fix it.

22 And then I saw my son coming into the middle of
23 the street down there. So I got out of my car and went
24 down there and basically told him to get out of the middle
25 of the street. And he stated that he heard air coming out

1 of it. So then I knew for sure I'd just park the car
2 where it's at, wait for AAA to come and fix it. In the
3 meantime I told him to go back to the house and I was
4 going to visit my friend across the street until AAA came.

5 Q So there was an agreement that you had made that
6 you were -- that [REDACTED] was going to have possession of the
7 home during the pendency of this litigation, right? You
8 have a no contact order. You're not supposed to talk to
9 [REDACTED] right?

10 MR. THACKER: Object to the form.

11 Answer as best you can.

12 A Okay. As far as the agreement that you're
13 talking about, you have a copy of all that stuff. I would
14 have to get a copy of it myself and, you know, regurgitate
15 to you everything it says.

16 Q Do you think it was appropriate that you were
17 hanging out in front of the home the way you were hanging
18 out?

19 A Yes, it was perfectly legal.

20 Q Okay. And that clicking noise you heard, I
21 assume that that was the -- you think that was the nail
22 that you heard in your tire?

23 A Yes, that was the nail that was in the tire.
24 And the sort of funny thing about it is when my son went
25 to look at that, we also looked in the driveway of the

1 house and there seemed to be a big pile of dirt in that
2 driveway where my tire went over while I was dropping them
3 off.

4 Q So you literally heard the nail pierce the tire;
5 is that right?

6 A No.

7 Q You just heard the tire -- every time it would
8 rotate you could hear the click of the nail --

9 A Yes.

10 Q -- against the ground?

11 A Yes. I had the windows down.

12 Q Okay. And then instead of pulling away and
13 going away you instead circled back around and parked your
14 vehicle?

15 A Well, I initially turned that way because my
16 intent was to visit with my friend across the street
17 anyways. To do that I had to go in that direction to get
18 into his driveway.

19 Q Okay. So you heard the clicking noise, but you
20 were still going to go visit your friend, right?

21 A Well, that was the original intent, and then I
22 figured since I can't move the vehicle I will still go
23 visit him.

24 Q Okay. Where did you park the vehicle?

25 A In front of my friend's house.

1 Q Okay. How far away was that from your house?
 2 A It's across the street.
 3 Q Okay. So if you were [REDACTED] and you were looking
 4 out the window of the home you could see your car right
 5 out the window, right?
 6 A Yes.
 7 Q Did you ultimately go visit with your friend?
 8 A Yes.
 9 Q Okay. And then did you ultimately come back to
 10 your vehicle and hang out in your vehicle for a bit?
 11 A No.
 12 Q Okay. When did you call AAA?
 13 A When I stopped down the road after I noticed the
 14 clicking and looked out and saw what the problem was then
 15 I called.
 16 Q Okay. So then you were across the street
 17 visiting a friend's house. You went and visited with him,
 18 right?
 19 A Yes.
 20 Q How long did you visit with him?
 21 A I'm not sure of the exact amount of time. I
 22 would say it's probably about maybe a half an hour to an
 23 hour.
 24 Q Okay. And then you got back into your vehicle,
 25 right?

1 A No.
 2 Q Okay, no.
 3 A What happened was while I was talking to him all
 4 of a sudden there were three police cars that pulled up.
 5 So then we stayed in his driveway until the police came
 6 and spoke to me.
 7 Q Okay. Then after the police came is that when
 8 you called AAA?
 9 A No, no. As I stated before, I pulled out of the
 10 driveway. I heard the clicking and I went down the road a
 11 little further. I got out, saw the nail in the tire.
 12 Then I called.
 13 Q Okay. And that's -- and where were you parked
 14 at this point when you called AAA?
 15 A A few houses down from my house.
 16 Q Okay. And then after calling AAA you got back
 17 into your vehicle and drove the vehicle back towards --
 18 right in front of your house?
 19 A Yes. After I saw my son in the middle of the
 20 road, yes, I did.
 21 Q Okay. So then you were waiting a few houses
 22 down. You had called AAA. And that's when you saw your
 23 son in the middle of the road?
 24 A About that time, yes.
 25 Q Okay. Which son was it?

1 A [REDACTED]
 2 Q Okay. Did [REDACTED] come out to see why you were
 3 hanging out?
 4 A Well, I'm not sure what his intent was; but,
 5 yes, he did see me.
 6 Q He came out to see dad because dad was still --
 7 dad didn't leave, right?
 8 MR. THACKER: Object to the form.
 9 Answer as best you can.
 10 A I'm not sure what his motivation was; but,
 11 anyways, there he was in the middle of the road so I came
 12 back down.
 13 Q Then you turned around and drove your vehicle
 14 back, right?
 15 A Right. I told him to get out of the road.
 16 Q And said go back in the house [REDACTED]
 17 A After we looked at the tire and we looked at the
 18 pile of dirt in the driveway I said go back home and then
 19 I went to visit my friend.
 20 Q The friend that you were going to visit anyways,
 21 right?
 22 A Yes.
 23 Q Which is why you had driven in the opposite
 24 direction of the direction you needed to go to leave,
 25 right?

1 A Yes.
 2 Q Okay.
 3 A It wasn't -- I wasn't leaving. I was previously
 4 informed that there was no problem with me to visit my
 5 friends in the neighborhood. It was perfectly legal. And
 6 to this date it still is.
 7 Q You wanted [REDACTED] to see you out front of the
 8 house, didn't you?
 9 A No, that wasn't my intent at all. That's why I
 10 pulled down to the other side of his driveway where she
 11 wouldn't see my vehicle.
 12 Q You wanted [REDACTED] to know that you weren't going to
 13 leave if you didn't want to, correct?
 14 MR. THACKER: Object to the form, asked and
 15 answered.
 16 A No.
 17 MR. THACKER: Answer as best you can the
 18 question that you were asked.
 19 A No.
 20 Q Where are you currently staying at?
 21 THE DEFENDENT: Can I speak to my lawyer one
 22 moment?
 23 MR. DEMON: Okay.
 24 (Whereupon, a break was had.)
 25 MR. DEMON: Back on.

1 Q Your friend across the street from the marital
2 home, what's his name?
3 A His name is [REDACTED]
4 Q What's [REDACTED]'s last name?
5 A [REDACTED].
6 Q Are you good friends with [REDACTED]
7 A Well, as soon as he moved in we talked quite
8 frequently. He moved in. So, yes, I'd consider -- not --
9 friends, yes.
10 Q Friends. If I asked [REDACTED] do you think that [REDACTED]
11 would consider you guys good friends?
12 MR. THACKER: Object to the form.
13 Answer as best you can.
14 A Yes.
15 Q Have you gone back to see [REDACTED] after this
16 incident happened?
17 A I don't meet him at the house.
18 Q When is the last time you've seen [REDACTED]
19 A I'm not exactly sure when, but it was a few
20 months ago.
21 Q After this incident or before this incident that
22 we've been talking about?
23 A From the current time today I believe it was,
24 you know -- I don't know, two, three months, but I haven't
25 spoke to him because his father was admitted to the

1 hospital and he's very sick and so he's been very busy
2 with taking care of his family.
3 Q Okay. The last time you spoke to him, was it
4 this time that the cops got called out?
5 A No.
6 Q Okay. The time after that that you spoke to
7 him, was it on the phone or in person?
8 A In person.
9 Q Okay.
10 A Well, no, let me correct that, too. He also
11 sent me a text message informing me that his father was in
12 the hospital.
13 Q Did he ask you not to contact him?
14 A No.
15 Q Okay. Going back to your financial affidavit,
16 we were -- I'm going to turn your attention to page three.
17 I'm looking at the household expenses. That monthly
18 mortgage or rent payment, is that the mortgage on the
19 marital home?
20 A Yes.
21 Q Okay. That's 2,398; is that correct?
22 A That's what it says, yes.
23 Q Okay. Are you still paying that mortgage?
24 A Yes.
25 Q When was the last time you made a payment on the

1 mortgage?
2 A This month.
3 Q Okay. Is it in arrears or is it current and up
4 to date?
5 A It's up to date.
6 Q Okay. Have you made any changes to any of the
7 homeowner insurances?
8 A I'm not sure. Are you talking about both homes
9 or the marital home?
10 Q Let's start with the marital home. Have you
11 made any changes to the marital home insurance?
12 A I don't think so. There is -- you know, you
13 have to get flood insurance on that home, too, so there is
14 more than one insurance provider.
15 Q Okay. When you say you don't think so, what
16 causes you to think that there is a possibility that you
17 made a change to one of your insurances associated with
18 the home?
19 A Well, I know I didn't make a change. However,
20 there might have been a change of who provides the
21 insurance. I believe one of the insurance companies was
22 bought out by another. And whether a change was made with
23 the transfer over, I don't think so. That's why I can't
24 speculate as to what's -- if you look at one policy
25 compared to another policy if there are any differences.

1 Q Okay. But you haven't called the insurance
2 company and said, hey, I want to make a change with this
3 insurance policy associated with the home?
4 A No, I did not. Why would I do that?
5 Q I'm asking if you did.
6 A No.
7 Q And what about with the rental home? Any
8 changes with the insurance with that?
9 A Yes.
10 Q Okay. What change have you done?
11 A Well, I didn't realize it, but they said that I
12 needed to change it to a rental insurance, and all along
13 it was showing as a homeowner insurance.
14 Q Okay.
15 A And so that's -- they made the change and I was
16 like, okay, thanks.
17 Q Okay. When did that happen, recently?
18 A Yeah, fairly recent.
19 Q Okay. Any other changes that you've done with
20 any of the other insurances that might be associated with
21 these residences, flood, anything else?
22 A As far as any changes there might have been some
23 other changes, but everything done -- I'm not sure exactly
24 what changes. I know that there had to be some changes
25 just because of, you know, sometimes you have excess

1 insurance on certain things. And I spoke to some of the
2 people working there and they make changes to help me out.
3 They're very good to work with. They've turned around and
4 made this one change and it dropped the amount of
5 insurance and I was like, okay.

6 Q On which property?

7 A The rental property.

8 Q On the rental property, okay. Are you paying
9 the same amount of insurance for the home that you were --
10 when the separation happened?

11 A The insurance -- there are two insurances on the
12 home.

13 Q Okay.

14 A You have escrowed insurance, homeowners, that
15 goes with the mortgage payment.

16 Q Correct.

17 A The mortgage payment did change. It was a lot
18 higher like for the 2013 year up until they did something
19 with the Waters Biggert Act and they lowered the amount.
20 So I mean as far as everything goes the actual mortgage
21 payment has been steady since that change. Before this
22 mortgage payment it used to be over 3,500.

23 Q Okay. But it's been steady since you filed for
24 divorce, right --

25 A Right.

1 Q -- since there has been a filing for a divorce?
2 Okay. Car insurance, did you remove one of the vehicles
3 from your auto insurance plan?

4 A Okay. As far as the vehicles go --

5 Q Uh-huh.

6 A -- this is another thing. When I called the
7 insurance they informed me that I could not carry my
8 spouse on insurance because she no longer resided under
9 the same roof with me. So they said that she couldn't be
10 covered. I got them to agree to extend it two weeks until
11 she got her own policy.

12 Q Your insurance company called you and told you
13 that, or did you call the insurance company?

14 A No, I called the insurance company.

15 Q Okay. And what did you say to the insurance
16 company?

17 A Well, the original call -- basically we had an
18 issue with my son driving the vehicle. I have an issue
19 with him driving.

20 Q This would be [REDACTED]

21 A This is [REDACTED]

22 Q The 18 year old, correct?

23 A Correct.

24 Q Okay.

25 A I was worried he was driving it by himself. He

1 only had a learner's permit, which I understand he finally
2 got a driver's license within the past month or so. But I
3 also have concerns that he's not taking his ADHD medicine.
4 He has trouble controlling his impulses and making good
5 decisions.

6 Q When is the last time you talked to him?

7 A It was April.

8 Q Okay. And when did you call the insurance
9 company?

10 A I'm not sure of the exact date, but it was after
11 the deposition.

12 Q Uh-huh.

13 A And after the deposition we were informed that
14 she was letting my oldest son drive the car. So I
15 basically informed her to get insurance and -- because I
16 did not have him covered as a driver under our current
17 policies.

18 Q So how did you handle it with the insurance
19 company? You called them because you were concerned that
20 your oldest --

21 A Right --

22 Q -- was driving?

23 A -- I called them.

24 MR. THACKER: David, let him finish before you
25 answer, okay.

1 THE DEPENDENT: Okay.

2 MR. THACKER: Just so the record is clear and
3 you don't talk over each other.

4 THE DEPENDENT: Yes.

5 Q So you were concerned that your eldest was
6 driving a vehicle and you didn't want that to happen,
7 driving it alone, so you called the insurance company,
8 correct?

9 A Yes.

10 Q Okay. And so what did you tell them, what
11 happened?

12 A Well, basically -- and I don't recall all the
13 specifics.

14 Q Okay.

15 A What it comes down to in a nutshell is
16 she needed -- I said give her two weeks to get her own
17 policy on the vehicles.

18 Q Okay. So you called to remove her from your
19 insurance is what you did, right?

20 A Yes, for more than one reason. For one, she
21 would not be covered under my existing policy, period.
22 The other reason is concerns over my son driving without
23 having a proper license or medication.

24 Q And you removed both of the vehicles that were
25 still at the marital residence from your insurance,

1 correct?

2 A No.

3 Q Okay. Which one?

4 A I did not remove them.

5 Q Okay.

6 A I turned around and I put it on 14 days.

7 Q Okay.

8 A And what I did was -- they said, well, probably

9 the most prudent thing to do is you put one in like

10 storage mode to where it will sit for a minimal storage

11 bill and then you carry the insurance full on the other

12 one for the 14 days until she gets her insurance, because

13 she has two vans sitting in the driveway and she really

14 only needs one van to drive. So, therefore, she was never

15 put out. She never had a vehicle that was uninsured.

16 Q Okay. [REDACTED] is going to -- he's going to USF now,

17 right? Isn't that correct?

18 A From what I was told he's going to the

19 University of South Florida St. Pete.

20 Q Like you mentioned, you don't have very good

21 communication with him, right? No communication with him,

22 right?

23 A There have been attempts. I have told my wife

24 to have him talk to me. I have called the home numerous

25 times and he refuses to communicate with me.

1 Q Has he communicated with you since you guys had

2 a physical violent episode?

3 MR. THACKER: Object to the form.

4 Answer as best you can.

5 A He did attack me while I was doing homework one

6 time. We spoke after that. Then he came after me another

7 time, and we spoke after that. So, yes, we did

8 communicate after he was aggressive against his father.

9 Q So he attacked you, is that what happened?

10 A Yes.

11 Q Okay. You didn't go and attack him and get

12 physically violent with him?

13 A No. There are police reports on this, too.

14 Q On page six of your financial affidavit you have

15 assets and liabilities. Under stocks and bonds you list a

16 Schwab account, and then underneath that you have a Schwab

17 husband's and then you have a Schwab custodial account for

18 children and then a Schwab education savings for children,

19 correct?

20 A Yes.

21 Q Okay. And those last two, the custodial account

22 and the education savings for children, you have listed

23 that those should go to the children; is that right?

24 MR. THACKER: Object to the form.

25 Go ahead and answer.

1 A Well, under the line of husband it says children

2 for the Schwab custodial account for children.

3 Q Uh-huh.

4 A And then for the Schwab education savings for

5 children it says children.

6 Q Okay.

7 A And that's under Column C, nonmarital husband

8 column.

9 Q Do you have any problem with freeing up some of

10 that money that's for the children for [REDACTED] who is now in

11 college?

12 MR. THACKER: Object to the form.

13 Answer as best you can.

14 A Okay. Once again I informed my wife numerous

15 times that my son [REDACTED] should talk to me about any of this

16 and then I can determine what he needs, what he doesn't

17 need. However, for a fact I know he basically has a free

18 ride to college right now. He'll get a check over \$900

19 after the end of the semester. He lives at home. He has

20 room and board taken care of. He really has no financial

21 need at this time.

22 Q How does he get to college? Do you know?

23 A No.

24 Q Okay. You don't want him driving to school, do

25 you?

1 A During my wife's deposition she stated she would

2 drive him to school.

3 Q I'm saying that you don't want him driving to

4 school or you wouldn't have taken him off your insurance,

5 right?

6 A That is not true. I want him to go to school.

7 If he could demonstrate that he is licensed, taking his

8 medicines and is a safe driver, then I have no problem

9 with it. However, I have witnessed him being erratic many

10 times while driving. Even my children say they have a

11 problem when he drives. My daughter personally says that

12 she has to correct him all the time.

13 Q How old is your daughter?

14 A Eleven.

15 Q And she tells you that she physically corrects

16 his driving?

17 A No. She has to yell at him and tell him to

18 watch things, slow down, put hands on the wheel,

19 everything.

20 Q Okay. So you think then that [REDACTED] should be

21 responsible for driving [REDACTED] to school then?

22 MR. THACKER: Object to the form.

23 Answer as best you can.

24 A Yes.

25 Q That's kind of what traditionally she's done,

1 right? She made sure the kids get to where they needed to
2 go, right?

3 A There is another option that's available to the
4 university. He can ride the bus for almost free from our
5 house to the school. I understand he's also made some
6 friends who he can ride with, too. I also have my family
7 that could give him transportation. There are many
8 options.

9 Q But I guess to bring it full circle, you don't
10 think this education savings account which you've listed
11 for the children should be something that is freed up for
12 ■ right now because he doesn't need it, right?

13 MR. THACKER: Object to the form.

14 Answer as best you can.

15 A No, I never said that.

16 Q Okay. Then do you think this is something that
17 you would consider freeing up so ■ can get access to
18 some of these funds?

19 MR. THACKER: Object to the form.

20 Answer as best you can.

21 A As I previously stated, I need to talk to my son
22 to determine what his needs are, what his goals are.

23 Q Okay. Is that perhaps something that maybe you
24 should be talking to ■ about?

25 A Yes, if we had a normal relationship and if she

1 was able to process things properly, but that is not the
2 case.

3 Q Okay. So she's incapable of having an
4 intelligent conversation with you about how to free up
5 money for finances; is that right?

6 A There have been many occasions where she has
7 been unable to reason about any of our financial assets --

8 Q Okay.

9 A -- within the past -- ever since May of 2013.

10 Q Okay. But your son would be able to reason with
11 you about the finances, correct, because he needs to talk
12 to you, right?

13 A My son can relay to me everything that he's
14 doing, what all his needs are, what all his expenses are
15 and what his plans are. I happen to know quite a bit
16 about helping him out and I've offered that to him many
17 times. He refuses to speak to me because my wife has
18 poisoned him against me.

19 Q Your wife's incapable of having a discussion
20 about finances with you, but you said that she should be
21 the one that drives your child to and from school; is that
22 right?

23 A Let me explain what I stated. She said that she
24 would drive my son to school in her deposition. I do not
25 know how he's getting to and from school.

1 Q You said earlier today that she should be the
2 one that drives your son to and from school.

3 MR. THACKER: Object to the form. That's really
4 not a question. Also are you asking him if he said
5 that?

6 MR. DENNEN: Yes, that's the question.

7 MR. THACKER: All right. Then you can answer as
8 best you can.

9 A I don't know what I said, but I do know that she
10 said that she would during the deposition transport him to
11 school.

12 Q And that's okay by you?

13 A Versus him driving himself, that is the better
14 option.

15 Q And so you're telling us today that ■ has
16 poisoned your 18-year-old son against you?

17 A Yes.

18 Q Okay. Why do you say that?

19 A Well, it goes back to the needed discipline for
20 him. He would stay in his room for almost a day doing
21 nothing but playing a video game. So when he had problems
22 with his school work, not helping around with the house,
23 refusing to do chores, I decided to take away his video
24 game. His mother gave him the video game back without
25 consulting with me.

1 I had a problem with him texting on his phone.
2 I caught him like two in the morning on a school night. I
3 took his phone away. His mother gave him the phone back.

4 Q How old was ■ at the time that you caught him
5 on his phone at two in the morning?

6 A I believe it was around -- he was 16 or 17.

7 Q Was it last year or two years ago?

8 A It was probably two years ago.

9 Q So your problem then is that you needed to
10 discipline ■ and ■ didn't like the way that you
11 disciplined him?

12 A ■ does not discipline ■

13 Q But you do?

14 A I try.

15 Q And you used physical discipline with ■
16 correct?

17 A It's to the point to where I cannot do that
18 because he's so big. So you have to, you know, try to do
19 some other way of disciplining him by taking away
20 something that he's abusing for his good.

21 Q When he was younger and smaller you were able to
22 physically discipline him; is that right?

23 A Yes.

24 Q And now that he's bigger it doesn't work any
25 more; is that right?

1 A Yes.

2 Q Under your stocks and bonds you have a husband's

3 Schwab, and in parentheses you put husband's premarital

4 amount to be determined.

5 A Yes.

6 Q Okay. Have you attained any expert or done

7 anything to determine an amount that you think is

8 premarital of this account?

9 A No.

10 Q Okay. Do you have an idea of how much you think

11 this account should be set aside as a premarital asset?

12 A No.

13 Q Why do you think some of this should be set

14 aside as a premarital asset?

15 A This is an account that I had prior to marriage.

16 Q The Schwab.

17 A Yes.

18 Q Okay. And do you have a statement of what that

19 account value was before you got married?

20 A I have many statements. I'm not sure. I'd have

21 to reference them.

22 Q Okay. Above that you have a Bank of America

23 money market account. It says ITF two minor children. Do

24 you see that?

25 A Yes.

1 Q What kind of account is that?

2 A Okay. The ITF thing, that sort of got messed up

3 anyways because I was trying to get all four children

4 under it and I don't know how that happened, but what

5 happened was this was a -- sort of a reaction to my wife

6 taking money out of a joint account we had behind my back

7 without my knowledge or my permission.

8 When I went to the bank and verified it they

9 said, well, you better take the rest of it out because

10 we've seen this before, and so they set up another money

11 market for me to put the money in there and then I had to

12 ask my wife what she was doing.

13 Q What was the account that you drew from to put

14 this money in this money market account?

15 A Offhand I don't know the specific account, but

16 it was obviously a Bank of America account.

17 Q Okay. What year did that happen?

18 A That happened in 2013.

19 Q And so why did you set this up with some of your

20 children on the account? I mean what happened.

21 A Well, that's -- that's what I had to do.

22 Instead of -- I wanted to put my children on it instead of

23 wife because she was taking assets. She opened up her

24 separate P.O. box. She did a whole bunch of things

25 separately, and I needed to figure out what the heck was

1 going on. And this is under the best advice I did what

2 was -- what I needed to do.

3 Q Okay. So your wife's name is not on this

4 account, right?

5 A Yes.

6 Q No, it's not on the account, correct?

7 A It's not on the account, yes.

8 Q Okay. Your wife does not have access to this

9 account, does she?

10 A No.

11 Q Okay. So earlier today when we first started

12 talking you had mentioned that your wife had access to all

13 of the accounts that you had access to. Do you remember

14 saying that?

15 A Prior to the marital difficulties, yes.

16 Q Okay. When were the marital --

17 A May 2013.

18 Q Okay. So after May 2013 that's changed, right,

19 she doesn't have access to all the accounts any more?

20 A After May 2013 she started doing a bunch of

21 irrational things, and in October of 2013 this is when I

22 found out she was taking money out of the joint account

23 and putting it in her own separate account she created.

24 Q Okay. So this account then was created

25 somewhere around October 2013 give or take, right?

1 A Right, along with her new accounts and her

2 separate P.O. box that she opened, all the other things

3 that she did, and basically I was informed, well, she

4 might be preparing for a divorce.

5 Q Okay. Do you have any rhyme or reason of why

6 you used this particular account, this Bank of America

7 money market account?

8 A Everything I do is for the better of the family.

9 Everything I did was to cover all of our debts, you know,

10 expenses, investments. So basically I took care of the

11 finances and investments of the family.

12 Q Okay. The Schwab account that says husband's

13 checking, does [REDACTED] have access to that account?

14 A No.

15 Q Okay. That's solely titled, correct?

16 A Okay. This account was her only point of

17 contention. What happened, we had a joint account and it

18 was a brokerage account. You could write checks on it.

19 Schwab changed their policy to where you could only write

20 checks on a bank account. So they turned around -- some

21 guy in Denver created a second account and her name was

22 dropped off of the checks.

23 Q This account was a joint account, but because of

24 some guy in Denver her name disappeared from the account?

25 A Yes.

1 Q When did that happen?

2 A I do not know an exact date.

3 Q Was that in 2013?

4 A I do not know.

5 Q Was it in 2014?

6 A I don't know the date. I mean it was before

7 2014.

8 Q Before 2014, okay. And was it before 2013 or

9 you don't know?

10 A I don't know.

11 Q Okay. The Wells Fargo RMA account, is that

12 solely titled in your name?

13 A Now it is, yes.

14 Q Okay. And when did that one become solely

15 titled in your name?

16 A Well, it's actually -- it actually started out

17 as an account just for our mortgage to where we could --

18 you know, if we wanted to pay our mortgage we could do it,

19 but I put it -- I put the account in my name especially

20 after she started moving things.

21 Q Which mortgage, the rental or the --

22 A The rental.

23 Q The rental, okay. And then in 2013 then you put

24 the account in your name only?

25 A I'm not sure of the exact date or the

1 circumstances. It was more like, well, we might use this

2 account. And the people at the bank said, well, just open

3 one up anyways because you have a mortgage with us.

4 Q Sure. Before you started to get worried

5 about -- well, before you started taking [REDACTED] name off

6 the accounts did you carry any balance in this checking

7 account associated with the Wells Fargo?

8 A I'm not sure.

9 Q Okay.

10 A I think you have to have a minimum to have an

11 account, and I think that was all that was in it.

12 Q Okay. Now, as of June of this year there is

13 almost \$30,000 in the account, right?

14 A It says 27 in the affidavit here, 27,962.

15 Q What money did you transfer into this account to

16 build up this balance?

17 A I don't know.

18 Q You handled the finances during the marriage,

19 right?

20 A Yes.

21 Q And in part because you just testified that [REDACTED]

22 couldn't handle it because you just don't think she could

23 handle it, right?

24 A We were advised by Dr. [REDACTED] of the Mayo Clinic

25 that I should handle the family's finances due to her

1 cognitive disabilities.

2 Q So there is a doctor that told you that you

3 needed to do this, is that what you're saying now?

4 A That's a fact.

5 Q Okay. But you don't know how you ended up with

6 \$30,000 in this Wells Fargo account?

7 A Well, here is the thing. There is many

8 accounts, many we're shuffling around. And if I do the

9 research I can give you the exact accounts, but I don't

10 know the numbers off the top of my head. All I do know is

11 that I paid bills between the Bank of America, Schwab and

12 Wells Fargo.

13 THE REPORTER: Excuse me. Could I have a

14 bathroom break?

15 MR. TRACKER: Certainly.

16 (Whereupon, a break was taken.)

17 Q Any other Bank of America accounts besides your

18 checking account and the money market account?

19 A Okay. What's listed here is checking --

20 Q Uh-huh.

21 A -- Bank of America and then there is money

22 market Bank of America.

23 Q Okay. Any other accounts besides what's listed

24 here?

25 A There are several joint accounts. Well, one --

1 I didn't count in here. Yeah. The only thing was a

2 custodial with my kid, but I closed that one because I

3 wanted to have equal number of accounts for every kid. So

4 I've got equal number of accounts for Schwab for every

5 kid. Each kid has one custodial account. I didn't want

6 to show favoritism because they complained about the

7 mother showing favoritism for the oldest on numerous

8 occasions.

9 Q My question was if there was any more Bank of

10 America accounts, or is it just these two Bank of America

11 accounts?

12 A From what's on my financial affidavit here it

13 shows two that are in my name so --

14 Q So that's it?

15 A In my name only, yes.

16 Q And that custodial account that you said you

17 closed, who was that with? Was it with Bank of America?

18 A Yes, it was with my oldest son.

19 Q And when did you close that?

20 A I closed that recently.

21 Q Okay.

22 A I think -- I don't know an exact date. It might

23 have been a few months ago. And I made sure -- I did that

24 after the other kids complained about the unequal

25 treatment. And I figured, well, this is just another

1 example and also to --

2 Q So you closed an account during the pendency of
3 this divorce; is that right?

4 A Yes. I closed several because --

5 Q An account that was in [REDACTED]'s name, right?

6 A Yes.

7 Q Okay. And right now [REDACTED] is not talking to you,
8 right?

9 A Yes.

10 Q Okay. But you're saying you closed that account
11 so you didn't seem like you were showing favoritism to
12 [REDACTED]

13 A I wanted to treat all the kids equal.

14 Q Okay. Did you close any other kids accounts?

15 A No.

16 Q Okay. And when you closed that account was this
17 the account that had about \$1,200 in it?

18 A I'm not sure of the exact balance. However --

19 Q Can you give me an estimate of the balance?

20 A -- I informed my son because he was -- he has
21 destroyed many things that I would take out the price of
22 destruction out of his account. He smashed a \$250 pair of
23 glasses for one item.

24 Q When did he smash the \$250 pair of glasses?

25 A I don't recall the exact time, but I know it was

1 after May of 2013.

2 Q Okay. So a couple of years ago he apparently
3 smashed a \$250 pair of glasses; is that correct?

4 A Yes.

5 Q Okay. And during the pendency of this divorce
6 you closed out an account that was in his name, right?

7 A Yes.

8 Q Okay.

9 A It was a custodial account that I had for him,
10 but I had two other accounts for him, and now every kid
11 has an equal number of accounts.

12 Q Okay. And the money that you took out of the
13 account that you closed, where did it go?

14 A It went to the bill paying account.

15 Q Okay. And to be fair you're saying that you --
16 you're making [REDACTED] pay you back for some glasses that he
17 smashed a couple of years ago; is that right?

18 A Yes, and various other things. He would destroy
19 things on purpose.

20 Q Okay. So --

21 A That was another thing that I was having issues
22 with his behavior. He was destructive with a lot of
23 things.

24 Q Okay. And so that's why you took out the \$1,200
25 or whatever it was recently and you stuck it into one of

1 your accounts, right?

2 A As far as -- as far as what happened, there were
3 a number of accounts that I closed with the Bank of
4 America because the balances got so low that they would
5 charge maintenance fees. It was no longer prudent to keep
6 these accounts.

7 Q Okay. Was this account with [REDACTED] was that one
8 of those accounts?

9 A This was one of the accounts that was closed,
10 yes.

11 Q Okay. And what is an estimate of the value that
12 was in that account?

13 A Offhand I don't know, but I know it wasn't as
14 high as what you stated.

15 Q Okay. Why did you not put that account on this
16 affidavit?

17 A Because it was with his name, too. Also it was
18 such a low amount and -- you know, as far as this goes, I
19 don't know why it didn't make it in here.

20 Q So tell me about the other accounts that didn't
21 make it on here.

22 A I have no idea. As far as I -- I believe every
23 account is in here.

24 Q Okay. You mentioned you had closed out a -- I
25 think your phrase was a bunch of little accounts that

1 didn't have a big value in them.

2 A Yes. I closed the Bank of America checking and
3 I closed the Bank of America money market.

4 Q Okay.

5 A I also --

6 Q The Bank of America money market that had
7 \$12,870 in here?

8 A Yes.

9 Q Okay. Where did that money go?

10 A That went to the Wells Fargo account which is
11 now the bill paying account.

12 Q Okay. When did you do that?

13 A Recently. And I don't know the exact date, but
14 it was -- it was a few months ago.

15 Q Why did you do that?

16 A Again, to keep from getting charged maintenance
17 fees because of low balance.

18 Q So you were getting a maintenance fee when you
19 had almost \$13,000 in the account for having a low
20 balance?

21 A From what I understand you have to have a
22 balance of like 25,000 to get no charges.

23 Q Do you know what that maintenance fee was?

24 A I believe it was around 25 a month.

25 Q Okay.

1 A But, again, I'll have to get into the
2 statements.
3 Q Okay. Any other Wells Fargo accounts besides
4 that RRA account?
5 A No.
6 Q Okay. Any other Charles Schwab accounts besides
7 the four that you have listed here?
8 A If you go on the next page, page seven, there is
9 a retirement plan where it shows profit sharing, pension,
10 IRA, 401k, etc.
11 Q The RRA?
12 A Yes.
13 Q Okay.
14 A That is a Schwab account.
15 Q That's solely titled in your name, right?
16 A Yes, it's my individual retirement account.
17 Q Did you have a \$100,000 CD in 2012?
18 A I have no idea. I don't know. I'd have to
19 check.
20 Q Okay.
21 A There was a lot of moving going on because we
22 were selling a house in one state and relocating to
23 another state. There was a lot of moves made. I'd have
24 to refer to many documents.
25 Q Okay. So then you can't recall whether or not

1 you had a \$100,000 CD with Bank of America?
2 A I would have to check.
3 Q Okay. Any other institutions that you banked
4 with in the last six years that are not listed here?
5 A Again, I'd have to check. This only goes back
6 how far? I mean --
7 Q I don't know. You did it.
8 A This is only a one year time frame, 2014, or
9 from when the time you file for divorce for a year back.
10 Q How long have you guys lived in Tampa, the Tampa
11 Bay area?
12 A My wife got here roughly a year before me --
13 Q What year was that?
14 A -- with the three kids. She moved into my
15 parents' house.
16 Q What year was that?
17 A I do believe it was 2011.
18 Q How many kids did she come with?
19 A All four.
20 Q Four. Four kids, right?
21 A She moved into my parents' place until we found
22 a place to live.
23 Q And where were you when she moved here?
24 A South Carolina.
25 Q Okay. And how long was she here with the four

1 children while you were still in South Carolina?
2 A Well, I visited regularly, but I could not
3 formally leave until I sold the home, and I do believe
4 July 2012 was the closing.
5 Q When in 2011 did she move down here?
6 A I think it was -- it was somewhere around July.
7 Q Of 2011?
8 A Yeah.
9 Q Okay.
10 A I'm not exactly sure of the dates.
11 Q And how long was she down here with the children
12 at your mother's house before she moved into a new
13 residence?
14 A I believe it was about maybe three months before
15 she moved over to the new residence. And then --
16 Q Okay. And then -- go ahead.
17 A Then she found a place that was, you know, a few
18 blocks away from my parents' house.
19 Q Okay. She found a place or did you help her
20 find the place or did she do it?
21 A My mother did.
22 Q And she was there for nine months living just
23 her and the children, correct?
24 A There were times when I would visit --
25 Q Okay.

1 A -- but she was in that home, and that's the same
2 home that was broken into by the pool person.
3 Q Okay.
4 A The exact number I'm not sure, but there is a
5 contract if we refer to it that would give you the exact
6 time frame.
7 Q Why did you stay in South Carolina when she
8 moved down here?
9 A Well, not by my choice. Actually my eldest son
10 was having troubles in school up in South Carolina.
11 Q Okay.
12 A So we made a decision based on the problems that
13 my son had in school that we would get him down to Florida
14 because we were going to move to Florida anyway and get
15 him established in another school. At that time he was a
16 freshman -- he would be a freshman in high school.
17 Q And, again, why did you not -- why did you stay
18 in South Carolina instead of coming down to Florida with
19 the family?
20 A Well, we had a home that needed to be repaired
21 and fixed before it could be sold. So I had to do all
22 those activities. And then I also had to finish up with
23 schooling. I had to take a semester off because of all
24 the family problems we had with my wife, you know,
25 getting -- almost dying and getting a traumatic brain

1 injury.

2 Q What year was that?

3 A That was 2011 -- oh, wait, 2008, sorry, is when

4 she got -- so then I took a semester off after that. So I

5 was behind schedule. And, anyways, that's just the way it

6 worked out.

7 Q So this injury that your wife had that causes

8 you such concern, that happened in 2008, right?

9 A Yes.

10 Q And in 2011 you sent your wife with the kids

11 down to Florida for a year while you stayed up in South

12 Carolina?

13 A I had family here more than we had in South

14 Carolina.

15 Q Okay. And your wife stayed with them?

16 A They were helping her out the whole time.

17 Q Okay. And she lived by herself with four kids

18 in the home while you were in South Carolina, right?

19 A My mother would spend the night at the house.

20 Q Every night?

21 A Not every night.

22 Q Okay.

23 A She would help -- she would take my kids to

24 school every day -- I believe my oldest specifically --

25 and they were always there to help. As a matter of fact,

1 one of the reasons why the guy got caught breaking into

2 the house is my dad went in there to install safety locks

3 in the home and he got trapped. So, you know, my parents

4 were there, you know, almost on a daily basis. That made

5 me happy that she had help more than we had any other

6 place.

7 Q And when did you move down from South Carolina

8 to Florida yourself?

9 A Well --

10 Q July of 2012, right?

11 A Well, after the home was closed and -- you know,

12 that was it. Then I could relocate.

13 Q Because you got your Bachelor's in civil

14 engineering in December of 2011, right?

15 A Yes.

16 Q And so then there was another seven months where

17 you were still in South Carolina just getting the house

18 ready for sale?

19 A Definitely. The home needed tons of work. I

20 spent a lot of time going back and forth to Florida. I

21 had to finish up some military things, too, and I had to

22 do my --

23 Q What were those?

24 A Well, I'm trying to remember exactly 2011,

25 Okay. Most of that -- what I was doing was I was also

1 applying for a Master's to go to school down here. So I

2 was going through that process. And so basically had

3 trouble selling the home, and that took a lot longer than

4 I thought it would. And I'm going to have to refer to

5 my -- I don't know -- to figure out everything else that I

6 did, but I was always busy.

7 Q In South Carolina?

8 A Ever since I retired I've been busy, yes.

9 That's the amazing thing about it. And we made an

10 agreement since she was no longer able to work that I

11 would go back to school and try to get the certifications

12 and everything I needed to where I could get a job.

13 Q And you've been going to school for quite some

14 time now, right?

15 A Yes.

16 Q About eight years?

17 A Yes.

18 Q Okay. But you still don't know if you're going

19 to be entering the workforce any time soon, right?

20 A Everything is in the air with the current family

21 situation. I'm just taking it day by day now.

22 Q Okay. In 2013 did your wife go visit family in

23 Mississippi in the summer?

24 A 2013?

25 Q Uh-huh.

1 A I went with her in the summer to visit family.

2 Q In 2013, right?

3 A Yes.

4 Q Okay. Did you cut that trip short early and

5 then come back home?

6 A I don't know what the specifics are. I have no

7 recollection, but if I did it was -- I'm sure there was a

8 good reason.

9 Q And if you did she would have stayed with the

10 kids in Mississippi while you were back here, right?

11 A Again I can't recall.

12 Q So you can't remember if in 2013 there was some

13 time that you were back here in Florida while your wife

14 was with the kids in another state, in Mississippi?

15 A There might have been. I'm not sure. I mean

16 I'll have to -- I'll have to just go back and check, you

17 know, look and see if there was anything that I was doing

18 or had to do.

19 Q And your wife spent some substantial time with

20 the kids in Mississippi in 2014, right, over the summer?

21 A To my objection. I would rather have my family

22 with me in D.C., you know, in the Virginia house. She

23 decided to do that on her own. And I didn't agree to it.

24 I didn't think it was the best thing for the kids. The

25 kids liked to visit Virginia and Washington, D.C. I

1 figured we should have some family time, and instead she
2 took the kids without my permission, without my agreement,
3 and I made it clear to her family they could come visit us
4 any time they want.

5 Q Do you have any problems with her family in
6 Mississippi?

7 A I don't have -- I don't have problems. I've
8 been nice to every one of them. There has never been a
9 problem, per say.

10 Q Did you object to your wife going to visit
11 family in Mississippi this summer with the kids?

12 A Yes.

13 Q Why?

14 A I initially had the understanding it was illegal
15 for someone to take the kids out of state while divorce
16 proceedings were ongoing. So, of course, I didn't give
17 her permission to do something which I thought was
18 illegal.

19 Q Did you eventually realize that that's not the
20 case?

21 A After she took them out of state without my
22 permission, yes.

23 Q Did it make you angry that she took them out of
24 state without your permission?

25 A It's not angry.

1 Q What's the emotion?

2 A Lately everything with my wife has been a huge
3 disappointment. Disappointment is the word.

4 Q Going forward would you object to your wife --
5 when this is all said and done, would you have a problem
6 with your wife taking the kids to Mississippi for a term
7 of weeks to visit their family?

8 A I don't have an objection to that, no.

9 Q You have a Sea-Doo boat?

10 A Yes.

11 Q How did you pick the value for the Sea-Doo boat
12 that you have listed on your financial affidavit?

13 A The Blue Book value.

14 Q KBS, that's where you got it from?

15 A Yes.

16 Q Who has possession of the Sea-Doo right now?

17 A It's in the marital home right now.

18 Q Okay.

19 A At least that's where I last saw it. I do not
20 know exactly where it's at.

21 Q Okay. And the kayak, is that at the marital
22 home, too?

23 A Yes.

24 Q Where did you get the value for that?

25 A Well, it's lower than the purchase price, and

1 what you do is you refer to what a similar kayak is
2 selling for. It's used. So it was an estimate. And I
3 bounced it off someone who actually owns a business that
4 sells kayaks and he said that's pretty good.

5 Q Okay. And your -- I asked you earlier but you
6 didn't answer. We took a break. Your current residence,
7 where are you living right now?

8 A I've got a home that's comparable to the one --
9 to the marital home, and it's on 15525 Redington Road,
10 Redington Beach, Florida, 33708.

11 Q And the rent that you're paying every month on
12 that property?

13 A The rent is 2,500 a month.

14 Q Do you have a lease?

15 A Yes.

16 Q How long is the lease for?

17 A The lease is -- it was a six month lease, and it
18 will be up in December.

19 Q Okay. Do you guys have some substantial
20 personal property that's in storage? By substantial I
21 mean hundreds of pounds worth of personal property that's
22 in storage?

23 A Yes.

24 Q Okay. Where is that at?

25 A I have it in a storage place on Seminole

1 Boulevard.

2 Q Okay. How many storage units is it taking up?
3 How much stuff are we talking about?

4 A One.

5 Q How big is the unit?

6 A It's a 10 by 20.

7 Q Does your wife have access to that?

8 A No.

9 Q Do you have any other marital possessions that
10 are in any other place besides your residence, her
11 residence or the storage unit?

12 A No.

13 Q Have you transferred a lot of stuff to your
14 mother's residence?

15 A No.

16 MR. DENMON: All right. Can I just have a
17 second with my client?

18 MR. THACKER: Yeah.

19 (Whereupon, a break was had.)

20 Q Do you know a [REDACTED] [REDACTED]?

21 A I think the name is [REDACTED].

22 Q How do you know [REDACTED] [REDACTED]?

23 A That was a friend that my wife made because both
24 of our kids were going to a preschool at Blessed
25 Sacrament.

1 Q Were you friends with Ms. Belcaster as well?

2 A Initially.

3 Q Initially being that at some point you were no

4 longer friends with her?

5 A Until I discovered what her character was and

6 the fact that she helped break up another family's

7 marriage.

8 Q And how did you discover that?

9 A Well, I was informed by the person whose

10 marriage split up, a friend of ours, that she would watch

11 his kids while his wife was cheating on him.

12 Q This is another friend of yours?

13 A Yes.

14 Q And who is that friend?

15 A It's [REDACTED]

16 Q And [REDACTED]'s last name?

17 A I do believe it's [REDACTED] but I'm not exactly

18 sure what the spelling is.

19 Q Did [REDACTED] get mad at you for taking pictures and

20 videotaping her?

21 A I'm not sure if she got mad at me or not. I

22 don't know.

23 Q Did you take pictures of Tammy or videotape her?

24 A We went out. While we were all friends I took

25 pictures of everybody. Whether she was in the pictures or

1 not -- I mean it's just a matter of when you're hanging

2 out with one family and another. Our two youngest were

3 best of buddies while they were in preschool for awhile.

4 Q Did she confront you or her husband confront you

5 because you were taking pictures and videos of her?

6 A No.

7 Q Did you threaten them and say that you knew

8 people in the Mob and you were going to bring Mob violence

9 down upon them?

10 A No.

11 Q So that relationship was terminated you're saying

12 because of you terminated it, not because she terminated

13 it?

14 A No, I didn't have the power to terminate any

15 relationship.

16 Q Is the relationship still ongoing?

17 A I don't know.

18 Q Would you be surprised to hear that she's in

19 fear of you?

20 MR. THACKER: Object to the form.

21 Answer as best you can.

22 A I find that very surprising because I have a

23 permanent scar on my face from this woman from when we

24 were playing volleyball and she, quote, accidentally hit

25 me in my face with her wedding ring. For her to have any

1 fear of me is sort of laughable. She would complain --

2 she would complain that she was almost going to be an

3 Olympic athlete, that she could beat any man swimming.

4 Yes, I'm very surprised.

5 Q Are you saying that she physically assaulted

6 you?

7 A Yes, I am, but at the time it was -- you know,

8 she exclaimed it was an accident.

9 Q So you believed her at the time?

10 A Yes.

11 Q But now you don't believe her any more?

12 A I don't know what to believe. All I know is the

13 fact that I've got a permanent scar on my face from this

14 woman.

15 Q In 2015 were you following [REDACTED] with your vehicle

16 when she had the kids in the car?

17 A (No response.)

18 Q Have you ever followed [REDACTED] with your vehicle

19 when she has the kids in another vehicle?

20 A There are multiple occasions where we follow

21 each other going places. I mean it's -- so yes.

22 Q Have you ever hit her with your -- have you ever

23 hit the vehicle she was driving with the vehicle that you

24 were driving?

25 A Yes.

1 Q When did that happen?

2 A When she stopped in the middle of the road while

3 I was turning.

4 Q Why were you following her vehicle?

5 A Because we were going home.

6 Q Where were you going home from?

7 A I don't remember.

8 Q You're saying that when you named her vehicle

9 or hit her vehicle that it was unintentional?

10 A Yes, it was very unintentional. Why would I hit

11 my own vehicle?

12 Q And it was her fault because she hit the brakes

13 too quick?

14 A Yes.

15 MR. DEMON: I thank you for coming in today and

16 talking to me. I don't have any other questions.

17 Your attorney may have some questions. He may not.

18 MR. THACKER: I don't have any questions. He'll

19 read, please, and we'll take a copy if it gets

20 ordered. Thank you all very much.

21 THE REPORTER: Do you need to order at this

22 time?

23 MR. DEMON: Yes, let's order it, please.

24 MR. THACKER: I'll just take a copy.

25 * * *

DEPONENT'S CERTIFICATE

I have read the foregoing transcript of my oral deposition taken on the date and at the location indicated on the title page of the deposition, and I certify that said transcript is true and correct, with the provisions that any errors appearing therein have been corrected by me by listing on a separate sheet as to page number, line and content of said error(s), and further indicating the language to be substituted.

I also understand that upon completion of the reading, signing and correcting of the transcript, I am to return this original signature page, my list of corrections and said file copy provided for my inspection to the person or company listed on the pre-addressed envelope provided to me.

I further understand that if I do not carry out the instructions stated above within thirty days from the date I receive the transcript, I automatically waive my right to read and sign the deposition.

DATE: _____ NAME: _____

CERTIFICATE OF REPORTER

STATE OF FLORIDA)
COUNTY OF PINELLAS)

I, SHARON RUBY, Court Reporter, Notary
Public at Large,

DO HEREBY CERTIFY that I was authorized to and did stenographically report the foregoing deposition taken before me at the time and place set forth; that the proceedings of said deposition were stenographically reported by me in shorthand, and that the foregoing pages, numbered 1 through 39, inclusive, constitute a true and correct transcript of my said stenographic report.

I FURTHER CERTIFY that I am not a relative or employee or attorney or counsel of any of the parties hereto, nor a relative or employee of such attorney or counsel, nor do I have any interest in the outcome or events of this action.

SHARON RUEY
COURT REPORTER
NOTARY PUBLIC - STATE OF FLORIDA

**BRITISH SHIRT**

READING AND SIGNING OF DEPOSITION TO BE
ATTACHED TO THE DEPOSITION OF DAVID YOUNG, TAKEN ON
OCTOBER 14, 2015, IN THE CASE OF DAVID ALLEN YOUNG VS.
PAMELA JANE YOUNG. TAKEN BY SHARON RUBY.

TO THE DEPONENT: IN COMPLIANCE WITH THE RULES OF CIVIL PROCEDURE THIS IS ATTACHED FOR YOUR INSPECTION AND SIGNATURE. ANY CHANGES IN THE DEPOSITION IN FORM OR SUBSTANCE WHICH YOU CARE TO MAKE ARE TO BE MADE ON THIS SHEET WITH YOUR REASON THEREFORE.

DO NOT WRITE ON THE DEPOSITION ITSELF

FOR THE PETITIONER: CHRISTIAN DENMON, ESQ.

FOR THE RESPONDENT: JOHN THAYER, ESQ.

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DAVID YOUNG DATE