

1 A. -- that's not something that I prepared.

2 Q. Okay.

3 A. And, I was simply notarizing the signatures. You know,  
4 I'm not a trust attorney. I don't pretend to know trust law.  
5 So, you know, whether some other requirements had to be met, I  
6 don't know.

7 Q. Do I understand that you advised Sue and Mr. Bell early on  
8 that they may want to consider him transferring some assets out  
9 of his name?

10 A. I did, yes. And, Mr. Durand, I was also made aware -- I  
11 mean, you know, I wasn't totally familiar with his affairs,  
12 when they first came to me, but it was pretty shortly after I  
13 was in touch with Mr. Walker, the U.S. Attorney's Office, that,  
14 you know, he advised me that apparently they had done some  
15 checking, the government, and Walker mentioned to me that he  
16 had a couple of large CDs and I mentioned it to Sue, because I  
17 didn't know exactly what the denominations were or anything.

18 Q. But, the government knew about the money?

19 A. Oh, yeah.

20 Q. One of the plaintiffs was a woman named Pam Broussard, is  
21 that correct?

22 A. Correct.

23 Q. Do you remember her deposition being taken?

24 A. I do. It was at the City Court in Kaplan, because  
25 Judge Rudy Bourg (phonetic), former City Judge, was co-counsel

EXHIBIT

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