

1 beneficiaries?

2 A. No, sir.

3 Q. At any point, did you and Sue have a conversation about
4 her beginning to draw some compensation from the Trust for her
5 work as Trustee?

6 A. Yes, sir.

7 Q. All right. Tell us what you remember about that
8 conversation, please.

9 A. Sue asked if it were -- I guess "appropriate" would be a
10 word -- for her to draw some type of compensation or fee for
11 the time that she was spending working with the Trust, going
12 back and forth toward the farm, meeting with whoever needed to
13 be met with, and I agreed that that would be a legitimate
14 expense.

15 Q. Was there any discussion of any particular amount?

16 A. I believe the amount that was suggested was \$1,000 a
17 month.

18 Q. That's what you had suggested?

19 A. No, I think she asked if that would be too much, was her
20 question to me, would that be extravagant, and my reply to that
21 was based upon the hours that she was working for that Trust,
22 which at that time I think was almost full-time, that that was
23 not an exorbitant fee, by the hour, for the amount of time she
24 was spending.

25 Q. For the amount of time she was spending, that might not

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1 even have been minimum wage, is that correct?

2 A. It probably would not have.

3 Q. In the bench book before you, please turn to tab Number 48

4 -- I'm sorry; maybe 49.

5 A. I don't think I have a 49. No, there's not a 49 in this
6 one.

7 THE COURT: Which book are you looking at?

8 MR. DURAND: Plaintiff's.

9 THE WITNESS: Plaintiff's exhibits? Mine ends on 48,
10 unless -- let me see; let me look again.

11 MR. DURAND: Go to 48.

12 THE COURT: Number 48 is Dr. Friedberg, I believe.

13 THE WITNESS: Dr. Fredrick?

14 Oh, I'm sorry, I do have a 49. Okay.

15 MR. DURAND: It's 50.

16 THE WITNESS: Okay.

17 BY MR. DURAND:

18 Q. I'm going to ask you about that. I apologize. That
19 single sheet marked "Bell Family Trust, Expenses not Related to
20 Trust Activities."

21 A. Okay.

22 Q. With regard to the first item, the cell phone bill, do you
23 recall whether, at any point, you refused to -- or your firm
24 refused to deduct any of the cell phone bills, that were
25 submitted, on the federal income tax return?

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1 A. Well, there weren't a lot of discussions. There was
2 one discussion, she was working quite a number of hours for the
3 Trust at that point in time. It was my understanding that it
4 was pretty much taking up seven days a week, most days.

5 Q. I want to make sure that -- the discussions about \$1,000 a
6 month were done under the time that you understood she was
7 pretty much working -- I think in your deposition you said
8 every waking hour on trust business.

9 A. Well, if she was working every waking hour on Trust
10 business, \$1,000 a month would be a very low compensation --

11 Q. Now, did she ever come back --

12 A. -- for that type of work.

13 Q. -- and tell you that her hours for the Trust had been
14 reduced and that maybe they ought to reconsider the
15 compensation that was put in place at one time?

16 A. Even if her hours would have been reduced, I know at one
17 time she did work outside of the Trust. She did have a job
18 with an entity maybe near Grand Cateau, Opelousas, on the north
19 side of Lafayette. We didn't discuss the fee or the number of
20 hours. I did not keep track of her hours.

21 Q. ' Okay. So, it's fair to say that after the \$1,000
22 discussion there was no other discussions about her fee for
23 compensation?

24 A. No, sir.

25 MR. ACKERMANN: Those are all the questions I have,

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1 Q. You're talking about Debbie Mull?

2 A. Right.

3 Q. Okay.

4 A. And, I also had a conversation with Joan as to whether or
5 not she thought that \$1,000 as retainers -- and I drew it all
6 the way back to August '96, -- that surely, when I came up with
7 my compensation package, that it would be greater than the
8 \$1,000 a month. And, she said, "Well, I believe so. I think
9 you're at less than minimum salary at \$1,000 a month."

10 Q. And, "Joan" is Joan Martin, the CPA, --

11 A. Yes.

12 Q. -- who testified earlier?

13 A. Yes.

14 Q. Okay. Now, at some point later on, you decided that it
15 was time to take your final compensation, is that correct?

16 A. When the Seitel thing fell through, which was about in
17 April or May if memory serves me correct -- it might have been
18 March -- that's when I knew I was not going to pursue any more
19 Amerada Hess and I knew that I had to pull all these numbers
20 together to go ahead and compensate me.

21 Q. And, so when did you start working on that?

22 A. I started working on it right after Seitel refused us to
23 see the seismic data.

24 Q. All right. How did you determine for yourself what you
25 thought would be a reasonable fee for what you had done over

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1 BY MR. DURAND:

2 Q. Ms. Bell, in that second paragraph, in the second
3 sentence, you say, "It was indicated that the administration of
4 the a Trust, with all things set, and a minimal of
5 administrative time, Trustee fees averaged \$1,000 monthly."

6 What do you mean "all things set, and a minimal of
7 administrative time"?

8 A. Had it just been a normal "I love you" trust and no
9 problems attached.

10 Q. You're talking about a portfolio trust, where you're just
11 managing stocks and bonds?

12 A. Correct.

13 Q. But, in the next sentence, you went on to point out that
14 it was taking you -- you were full-time?

15 A. Yes, so --

16 Q. Did you ever think that \$1,000 a month was full and
17 adequate compensation to you for what you were doing?

18 A. No, because Joan and I discussed that it would equate to
19 less than minimum wage per hour. So, it was just a safe number
20 to start drawing some retainers towards the compensation
21 package.

22 Q. When did the \$60,000 -- when were you comfortable with the
23 \$60,000 a year figure that you thought was reasonable
24 compensation for what you had done?

25 A. After I got some input and legal advice from Stan and the

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