

1 know, like what's the point of pursuing this? Can anything  
2 be done about it?

3 I mean, that was her concern.

4 Q. And, you mentioned going over to Ruby Bell's house --

5 A. Just that one time, when I met with Mr. Bell, and Ruby and  
6 Sue took a ride while I was there to talk to him privately and,  
7 you know, he denied having all these extensive photographs.

8 Q. Did any of these other family members, you know, cut you  
9 off or give you the impression, you know, "Don't bother me  
10 about this. Don't contact me"?

11 A. No.

12 Q. Or did you feel like you could call anybody, if you would  
13 have needed assistance?

14 A. If nobody calls you, you obviously don't have a need to  
15 call them. I mean, Sue was the contact that I had with him.

16 Q. I mean, is that unusual? I mean, have you represented  
17 defendants with large families, several siblings and, you know,  
18 one person kind of is the one that's kind of handling things,  
19 kind of the contact person? Is that unusual?

20 A. I don't know if it is or not. I mean, in this case, she  
21 was the one who took the interest and was in touch with me  
22 almost -- for sure a couple of three times a week, if not every  
23 day.

24 Q. You don't have any personal knowledge that no one else or  
25 that the other members, family members, refused to be involved

1 and refused to lend a hand?

2 A. None of them were ever present at any hearings that we  
3 went to. None of them were present when he was sentenced in  
4 federal court, besides her. None showed up for -- I mean, I  
5 didn't even have addresses for these people. They -- I think  
6 they knew I was representing him.

7 Now, I did get a call or two from Ruby Bell. I met her at  
8 her house that day. I went to talk to Mr. Bell.

9 But, my contact with any of the rest of them was  
10 practically non-existent.

11 Q. Now, early -- do you have -- do you recall when Mr. Bell  
12 actually entered a plea of guilty or cut a deal with the  
13 government and entered a guilty plea?

14 A. Not off the top of my head, without looking at the  
15 documents.

16 Q. Go ahead and look at it, and ---

17 A. Do you know what tab?

18 Q. It's in Tab 25.

19 A. In the same docket sheet?

20 Q. Look around the end of January of '97.

21 A. Do you know a specific date?

22 Q. I think it's the 23<sup>rd</sup> of January.

23 A. Yeah, plea entered by Wilfred Bell, 1/23/97. Right,  
24 Counts 2 and 3. Count 2 was the manufacturing or possession --  
25 same thing -- charge and Count 3 was the forfeiture charge.

EXHIBIT

1 I may have failed to talk simply enough.

2 Q. Those are things that a relative does with a criminal  
3 defendant, wouldn't you agree?

4 A. Yeah, and she did it. She was there and she did that.

5 Q. Things that a daughter does to help her dad, who is  
6 trouble?

7 A. She's there.

8 Q. You didn't hire her to communicate with Mr. Bell for you?

9 A. No. She was there. She was the one that brought him  
10 every time we met.

11 Q. Something that a daughter does for her father?

12 A. If she's there, yeah. She was there. That assumes the  
13 daughter is present and interested and involved, and she was.

14 Q. And, assisting you with running things to the courthouse,  
15 things of that nature; again, that's things that a relative or  
16 a daughter does for another relative?

17 A. If they're ready, willing and able.

18 Q. And, you've experienced that on many occasions, where a  
19 daughter assists her father with matters like that?

20 A. Yeah, I have before, sure. But, again, they've got to  
21 ready, willing and able to do it.

22 Q. Do you know if they send bills for their time doing that?

23 A. That's something I'm not involved in. That's not my deal.

24 Q. You said it was important in this particular case that,  
25 especially after Mr. Bell was released from federal prison,