

1 royalties from, and that those things were to be
2 transferred to the trust, too. So those are the
3 items that we transferred to the trust.

4 Q 'Other than the home and the land in which the home
5 sat, were there any other assets of Mr. Bell that you
6 knew he had or were told he had that were not going
7 to go into the trust?

8 A I don't recall discussing what other assets he had.
9 All I recall is that those were the assets that we
10 were putting into the trust.

11 Q Is it fair to say that -- let me ask it a different
12 way. What were the reasons -- you may have
13 already --

14 A I'm sorry. In my notes, we do -- actually, that's
15 okay. I thought my notes had references to other
16 assets, but they don't. Actually, they just refer to
17 the immovable assets.

18 Q All right. What was your understanding -- you may
19 have already answered this, but let's make sure the
20 record is clear as to why the home and the one acre
21 was not going to be transferred into the trust.

22 A Frank Dawkins comes into the picture there, Frank and
23 Sue Bell. I don't know anything about federal
24 criminal prosecutions and how those things work. But
25 it was my understanding that there was a plea bargain

1 being worked out in that somehow, in connection with
2 that, Mr. Bell needed to remove those assets from his
3 name, except for his home, and that it had some
4 'relation to the federal proceedings.'

5 Q All right.

6 A I don't know how it was related, but it had some
7 relation to that.

8 Q Did anyone express to you the fact that the house and
9 the one acre had been made the subject of federal
10 criminal forfeiture proceedings?

11 A I do recall it had something to do with the federal
12 proceedings, but I don't specifically recall how it
13 had anything to do with it, but that it did have
14 something to do with the federal proceedings.

15 Q Would it be fair to say that you were unaware of any
16 information to suggest that the assets that were
17 transferred into the trust were the subject of
18 federal criminal forfeiture proceedings?

19 A No, I had no information that indicated that.

20 Q All right. So would it be fair to say, then, that to
21 the extent Mr. Bell had over \$200,000 in bank funds
22 that did not go into the trust, you were unaware of
23 that?

24 A I don't recall any discussion about other assets.

25 Q All right. And would you have had any discussions