

**DEPOSITION SUMMARY OF DENISE DOE  
VOLUME 3  
TAKEN JANUARY 13, 2006  
CASE: US V. RIVER  
CASE NO.: CR04-1563-GHK**

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Examination by Ms. Jackson:

<b>BATE NO.</b>	<b>TESTIMONY:</b>
31904	[John Johnson is counsel for R. Todd Horton. Horton is the Trustee of the Bankruptcy Estate of Reed Cole. Julia Grand is appearing on behalf of Ms. Doe.]
31905	[Robert Tedson is appearing on behalf of Mr. Rak.]
31906	Ms. Doe recalls that she had talked about paintings she acquired from Mr. Cole in a prior session. [She was then shown the May 13 Rule 2000 Exam – Rule 2004 Examination transcript marked as Exhibit 1.] She states that page 8, Item 5 identifies the paintings that were removed from Mr. Cole’s residence. Ms. Doe had purchased those paintings from Mr. Cole in January 2001 and removed them from his residence on Sunday afternoon, April 29.
31907	Ms. Doe denies ever recording any document with the California Secretary of State regarding any of the paintings, or publishing any notice regarding the paintings she had removed. She is referred to paragraph F in Exhibit 1, and admits that she, in a prior examination, said that there are not any Doe/Cole entities.
31908	She is referred to phage 6 in Exhibit 1, and agrees that there are no Doe/Cole entities.
31909	Ms. Doe states that she had previously identified all Doe entities in existence since January 1, 1994 and all bank accounts.
31910	[Ms. Doe is referred to paragraph 5G of Exhibit 1.] The employees for the entities were Mr. Rak, Chris Lonis, Brian Hope, Sonia Mahmodi, and Mickey Pantonia. There was another girl but she doesn't remember her name. Joanne did digital photography. Pat Barry did bookkeeping for Denise Doe, Hunt Media and GUF, and her entities. Gwen Black did bookkeeping for Ms. Doe.

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BATE NO.	TESTIMONY:
31911	Susie Faith did photo developing. Ms. Doe she has identified each person who was an agent, employee or representative of any of the companies. Mr. Rak met most photography technicians at Brooks College. Pat Barry did bookkeeping for the entities from 1998 through 2000, and again in 2001, at Ms. Doe's residence.
31912	Pat Barry resides in Santa Barbara. Gwen Black has done bookkeeping for Ms. Doe from 2000 at Ms. Doe's residence. She is a Santa Barbara's resident. [Exhibit 1, on page 6, paragraph H refers to Denise Doe's business Services.]
31913	GGDBS Cuisine Management, which is Ms. Doe's sole proprietorship, has been in existence for two years. It is in development, and is not a functioning business yet.
31914	GGDBS is the only Denise Doe Business Services affiliate. [Exhibit 1, Paragraph 5, on page 6 refers to Tulf Technical Commerce.] It has no affiliates.
31915	Denise Doe Business Services Cuisine has never had any agents, employees or representatives. GUTS has no affiliates. Paulo Cordi was running everything in Switzerland for GUT SARL and Ms. Doe does not know of any other connections that company had. She met Mr. Cordi while in Europe with Mr. Rak in the summer of 2000, and had never met Mr. Cordi before.
31916	Ms. Doe does not recall if she ever answered the phone when Mr. Cordi was on the line. She had never transacted any business with him before he assisted her in establishing the GUT SARL company in Switzerland. Ms. Doe is, and has always been, the officer and director of Haunt Media, which is a corporation.
31917	Ms. Doe is the manager of Tulf Technical Commerce, LLC and there are no other managers, nor has there ever been. She has been the only signatory on the bank accounts of Denise Doe Business Services, Haunt Media and Tulf Technical Services since January 1, 1994.