

1 Q. And these feelings that you're being
2 abused, that he's using you and he's not present
3 for the job site, correct?

4 A. Yes.

5 Q. All right.

6 With respect to paperwork again, whose job
7 was it to fill out the ten-day notification?

8 A. Well, it was either of us but as the owner
9 of the company, he could have filled it out. I've
10 seen secretaries fill those out. It doesn't -- as
11 long as it's filled out, then they have a ten-day
12 notification on file. It doesn't really matter who
13 fills it out.

14 Q. Does it matter what's written in it?

15 A. Well, sure, it has to be accurate. I
16 mean, it has to -- it has to have the -- you know,
17 what are you removing. It's got to have are you
18 removing nonfriable, friable, I mean, whatever. If
19 it's a courtesy notification, it should be
20 nonfriable. I think I did do a courtesy
21 notification just to be on the safe side.

22 I did stay in contact with the EPA. I
23 called them frequently on questions I had because I
24 wasn't 100 percent familiar with Ohio law and I

1 didn't know if there was any differences between
2 that and whatever I knew about Illinois.

3 Q. Who filled out the ten-day notification
4 for the Cleveland Trencher site?

5 A. I was on site with Mike Collins and I
6 needed -- before I can fill that out, I needed
7 information that I did not have.

8 Q. Which was what?

9 A. I didn't know who owned the building. I
10 didn't know the age of the building. At the time,
11 I didn't know who Gary Piscazzi or whatever, who he
12 was and I come to find out he was the owner. I
13 asked -- there were certain line items that Mike
14 needed to get to me to fill out. And I believe
15 we -- we filled it out there on site and faxed it
16 at the neighbor's place of business. There was a
17 business right next door that had a fax machine and
18 faxed it over to his office and a copy over to
19 Tomas's office so that we could process it and get
20 a good copy because if -- we're on a demo site. It
21 was a mess. It was all muddy and we're trying to
22 fill out this ten-day notification and you can't
23 send it in like it's a piece of crud.

24 Q. Send it in to the Ohio Department of

1 Health, correct?

2 A. Right.

3 Q. So you faxed it from a neighboring
4 property to the Department of Health?

5 A. No. I faxed it to Tomas's office. I
6 faxed a copy to I believe Mike's office as well.
7 He had -- again, Mike had asked me to use this
8 person's name for the building owner and there was
9 questions on there that I couldn't answer. You
10 know, again, I'm not an expert at paperwork
11 regarding ten-day notifications or anything --

12 Q. Did you tell Tomas that you were not an
13 expert?

14 A. He knew that.

15 Q. How did he know that?

16 A. Well, because he worked with me for the
17 last year prior so.

18 Q. So Tomas knew that you were not an expert
19 in filling out ten-day notifications?

20 A. Well, who is? I mean, most of the -- the
21 people that fill those out are usually secretaries
22 or something like that.

23 Q. That's not a very extensive form, is it?

24 A. No. You just pretty much read -- but if

1 you don't have the answers, you can't send it in.

2 I mean, I don't -- I didn't know the age of the
3 building. I didn't know who did know that fact. I
4 didn't know the name of the owner. There was
5 things that I just -- that weren't present in any
6 document that I was privy to or that I received.

7 Q. Did you ever call the Department of Health
8 and ask a person there to assist you in answering
9 any of the questions on there?

10 A. Yes.

11 Q. Okay.

12 When was that?

13 A. Probably on one of my trips going back
14 home. I might have called the EPA. I can't
15 remember who I spoke with but --

16 Q. Do you know if you -- do you know who --
17 do you know -- do you remember what questions you
18 asked?

19 A. Well, one particular question I was
20 concerned about leaving the dumpsters on site.
21 They were un -- they were --

22 Q. If I may, my question to you was about the
23 notification form.

24 Did you ever ask anyone at the Ohio

1 Department of Health for assistance on filling out
2 the ten-day notification form because you said a
3 moment ago nobody knows how to fill out those forms
4 except secretaries? So since you didn't have a
5 secretary --

6 A. Well, no. I -- let me rephrase that. You
7 go by line item, you know. It asks you what to put
8 there. If you have the answer, you put it there.

9 Q. Okay.

10 A. I mean, some of the things, you know.

11 Some of the things, you just don't know.

12 Q. Okay.

13 Did you fill out the ten-day notification
14 for this job?

15 A. All the parts that I knew but I couldn't
16 submit it without the rest of the information.

17 Q. At some point, did you get it?

18 A. Yes.

19 Q. Okay.

20 How did you get it?

21 A. From Mike Collins.

22 Q. Okay.

23 Anyone else?

24 A. Molly.

1 Q. Okay.

2 Did you get anything from Tomas Amaya?

3 A. Well, I got the name of the foreman, the
4 supervisor.

5 Q. But you already had that from the July
6 meeting, right?

7 A. Well, yeah, but I -- you know, I still had
8 to put it down, I mean, did you want me to use
9 Carlos or do you want -- you know, how do you want
10 to do this?

11 Q. What did he say?

12 A. He said put down Carlos.

13 Q. Did you ask him if Carlos was going to be
14 present?

15 A. No.

16 Q. Did you care?

17 A. Not really. It doesn't matter as long as
18 a foreman is there. As a matter of fact, at that
19 time, I wasn't even sure if --

20 Q. Did you say it doesn't matter as long as a
21 foreman is there?

22 A. Well, a licensed foreman.

23 Q. But it doesn't -- didn't have to be

24 Carlos, right?

1 A. No.

2 Q. Where did you learn that?

3 A. Where did I learn that? From running
4 multiple jobs and seeing paperwork that didn't
5 have -- that had everybody but the foreman on
6 there. My name was -- I've run jobs where my name
7 should have been there and it wasn't.

8 Q. I believe you testified this morning that
9 you had no prior experience in filling out a
10 ten-day notification, correct?

11 A. Right.

12 Q. And despite that, from doing it this one
13 time, you were aware of the rule that you can put a
14 person's name down but they didn't have to be
15 present?

16 A. Well, I wasn't aware that that's a rule.

17 I just know that that happened to me many times.

18 Q. Okay.

19 Even though you didn't fill out the form,
20 correct?

21 A. Right. It's usually done by a secretary
22 or by somebody in the office.

23 Q. Okay.

24 I'm going to hand you Amaya Exhibit 6.

1 Take a moment to look at that, please. Okay.

2 Have you had a chance to look at that?

3 A. Yes.

4 Q. That's the ten-day notification form,
5 right?

6 A. Yes.

7 Q. Okay.

8 Did you fill that out?

9 A. I remember getting a lot of this
10 information, yes.

11 Q. Who typed that form up?

12 A. I don't know. I didn't.

13 Q. You did not type that form up?

14 A. Nope.

15 Q. We had testimony from Tomas Amaya that he
16 didn't type it up. He said that you must have.

17 Would that be true?

18 A. No. I use Word or I use Adobe PDF. This
19 is typed in. I don't have a typewriter.

20 Q. So you have no idea who typed that up?

21 A. No.

22 Q. And it was not you?

23 A. No, it was not me.

24 Q. Have you ever seen that form before?

1 A. Yes.

2 Q. You have? I mean, have you ever seen that

3 filled out form, Exhibit B, that you're looking at?

4 A. Well, not -- not in this form but I mean,

5 like I said, I remember getting Gary Thomas's P.O.

6 box number from Mike, but this was all handwritten

7 in, and the phone number. I didn't know any of

8 this information, the owner name.

9 Q. Well, you -- so you had a form that you

10 filled out by hand and then typed it up, right?

11 A. No, I didn't type anything up.

12 Q. You never typed up a ten-day notification?

13 A. No.

14 Q. At all?

15 A. No.

16 Q. Was the notification form typed up for

17 this job by anybody?

18 A. Well, it looks so, like it was. I mean,

19 you got a piece of it here.

20 Q. Did you see the ten-day notification form

21 that was submitted to the Ohio Department of

22 Health?

23 A. No.

24 Q. So if one were submitted to the Ohio

1 Department of Health, who would have taken care of

2 that?

3 A. It could have been Molly.

4 Q. Molly from Nationwide?

5 A. Yes.

6 Q. Where would Molly get the information on

7 Exhibit B about Anthony Paganelli and Safe

8 Environment?

9 A. I told you I filled out what I knew and

10 I -- whatever Mike gave me, I filled out and we

11 faxed it to her from the site.

12 Q. Did Mike give you the information about

13 Safe Environment?

14 A. No.

15 Q. Who gave you that information?

16 A. That came off of the license, the

17 abatement contractor's license.

18 Q. Where did you get that license?

19 A. Tomas.

20 Q. Okay.

21 How did he get it to you?

22 A. He handed it to me.

23 Q. In person?

24 A. Yes.

1 Q. Okay.

2 And when was that? Was that prior to

3 phase one?

4 A. No.

5 Q. Was that after phase one?

6 A. It was after phase one -- it was towards

7 the end of phase one.

8 Q. Okay.

9 Was that on one of the trips that you two

10 took together to Cleveland Trencher?

11 A. No. No. Again, you're asking me when he

12 gave me that license, Tony's license?

13 Q. Yes. Safe Environmental's license.

14 A. Okay. He gave me Safe Environmental's

15 license in Hammond at his office.

16 Q. During the summer meeting, correct?

17 A. No. I went to his office more than that.

18 Q. Okay.

19 Did he give you Safe Environmental's

20 license during phase one or before phase one or

21 after phase one?

22 A. During.

23 Q. Okay.

24 And what did he say to you when he gave it

1 to you?

2 A. That we can't -- you know, we're going to

3 have to use Tony's license? We can't wait for --

4 forever to get the other license in the mail,

5 something to that effect.

6 Q. Okay.

7 Did you ask him if -- about the status of

8 the contractor's license that you filled out

9 earlier for him?

10 A. No.

11 Q. Did you suggest that he call the

12 Department of Health to see what the status of that

13 was?

14 A. No.

15 Q. Did he make any indication to you that he

16 did not submit or did submit that form that you

17 filled out at that time?

18 A. No, he didn't tell me whether or not he

19 did.

20 Q. Did you care?

21 A. As long as he had a foreman there.

22 Q. Okay.

23 So as long as he had a foreman, you didn't

24 care whose license he used?

1 A. Right, even during the friable. I mean,
 2 as long as he had a foreman, he could still be on
 3 site and as long as he wasn't working, he could
 4 still give directions to the foreman just like I
 5 could over the phone.
 6 Q. Did you ever call Safe Environment?
 7 A. Never.
 8 Q. What was your relationship with Safe
 9 Environmental at this particular time?
 10 A. I no longer worked for Tony. We parted
 11 amicably, no grudges. As a matter of fact, I think
 12 before this contract came up, I had spoke with
 13 Sheila about doing a possible job for her, his wife
 14 so. No, I had no -- you know, I understood that he
 15 was having money problems and I knew that he had
 16 hired Rick Lovelace to do his estimating and I knew
 17 Rick had more experience in that field and he was
 18 probably making a good choice since he needed to
 19 find work.
 20 Q. So you were handed the license for Safe
 21 Environment by Tomas Amaya, correct?
 22 A. Correct.
 23 Q. In Indiana?
 24 A. Correct.

1 Q. In his office?
 2 A. In Tomas's office.
 3 Q. Right.
 4 A. Yes.
 5 Q. During phase one?
 6 A. At some point, yes.
 7 Q. Okay.
 8 Well, do you remember which point?
 9 A. No. It went very -- it went pretty fast
 10 because we overmanned it.
 11 Q. Did he tell you that Tony gave him
 12 authority at that time?
 13 A. It was understood.
 14 Q. Okay.
 15 A. I figured there's no way he could get this
 16 license without authority.
 17 Q. Did you contact Nationwide at that time
 18 and tell them the good news, that you had a
 19 license?
 20 A. Well, when I went back to the site and I
 21 told him, you know, we can fill out the ten-day now
 22 but I'm missing a lot of the information and then
 23 Molly said that Mike will be on site tomorrow. He
 24 was at another job site that he had just started.

1 He was running another job site too. This was kind
 2 of getting under my skin because everybody's
 3 running these other job sites and nobody's
 4 focussing on the one that I'm focusing on. So I --
 5 Q. Well, that includes you, right, because
 6 you were still going back and forth to Indiana with
 7 that three-day job that you had, right?
 8 A. Three-day job?
 9 Q. Didn't you say you had a three-day job
 10 where you were looking at something in Indiana,
 11 assessing it?
 12 A. No. No. No. No. I looked at it when I
 13 took my son back to college. It was an opportunity
 14 because I was going through Indy. I looked at it
 15 once. As a matter of fact, I called Mike's second
 16 in command from there and -- Chuck. I can't
 17 remember Chuck's last name but it's Mike's go to
 18 guy.
 19 Q. I think I had asked you why you didn't
 20 stay in Cleveland from the time that phase one
 21 began through the end and you said that you had
 22 work back in Indiana?
 23 A. I had work back in Indiana, A. I didn't
 24 have an Ohio license, B. I had a foreman that was

1 running the crew that they all spoke Spanish
 2 anyway. They were given directions by Tomas. It's
 3 pretty cut and dry to remove -- you know, there's
 4 nothing -- there was nothing difficult about the
 5 engineering.
 6 Q. Okay.
 7 When you -- so you've never seen this
 8 particular notification, is that correct?
 9 A. Not this neat and pretty, no.
 10 Q. And you didn't type that out?
 11 A. No, I did not.
 12 Q. But you did receive the license -- the
 13 Safe Environment license, a photocopy of it from
 14 Tomas?
 15 A. Yes.
 16 Q. And he told you that you would be using
 17 Safe Environment's license, correct?
 18 A. Yes.
 19 Q. And you didn't pose any questions to him
 20 because you trusted him, correct?
 21 A. Yes.
 22 Q. Was this during that same period that you
 23 were concerned about the miscommunication and the
 24 being abused and being phased out?

1 A. No, that was before that. I -- I was
2 still putting up with it. I was pretty tolerant.
3 Again, I was -- I've got a slow fuse.
4 Not to get into my personal life but I'm
5 bipolar and I could be very, very cordial or I can
6 be totally insane, just to let you know.
7 Q. I'll just ask you to be cordial for the
8 rest of this deposition if that's possible.
9 A. All right.
10 Q. So far you've been so.
11 A. Thank you.
12 Q. When the period of miscommunication
13 emerged, did you ever question Safe Environment's
14 license that was handed to you by Tomas?
15 A. Whether it was good or not?
16 Q. Yeah. Well, whether it was actually
17 authorized by Safe Environment?
18 A. No. Again, I was basing that on Tony does
19 that. He was probably going to get a percentage
20 and didn't matter to me as long as I had, you know,
21 a license that -- that was Ohio and it didn't
22 matter to Mike because that's what he was wanting
23 and --
24 Q. What was your understanding of what your

1 out would be from this job after the \$50,000 was
2 paid and work was done?
3 A. Well, I thought -- I told Tomas not to be
4 overly excited because, you know, we're probably,
5 at best, even with the change orders, going to
6 break even, at best. I says, you know, this is not
7 a money maker at all. I says it's a foot in the
8 door. It's getting you started. You wanted to get
9 your business started. This is what you can do.
10 Q. How did you come up with the break even?
11 This was going to be a \$50,000 job, correct?
12 A. \$50,000 is not a lot in asbestos abatement
13 jobs.
14 Q. Okay.
15 How much would the workers have to have
16 been paid, all the workers in total, for their work
17 for this kind of job, both phases, all phases for
18 which you wrote the contract?
19 A. How much would they have to have been
20 paid?
21 Q. Right. For this kind of work.
22 A. I usually go percentage. The -- I had
23 nothing to do with payroll. I don't know what they
24 were paid but I would have paid them probably

1 40 percent of the job if it was a good money making
2 job. The materials, I would have paid probably 10
3 to 15 percent. The hauling, maybe 10 to
4 15 percent. But labor costs usually is a big part
5 of the job. But because I knew that these were
6 Tomas's people and I knew that they were going to
7 work for less than prevailing or less than -- I
8 mean, he would have -- he wasn't going to,
9 obviously, not pay them but under, you know, fair
10 wage but, you know, it was nonunion. He could
11 probably get away with paying them \$15 an hour and
12 they would be happy with that.
13 Q. What percent of that total \$50,000 would
14 that come to if it wouldn't be 40 percent?
15 A. I don't know. I don't have a calculator
16 on me right now. Because he -- he had started out,
17 we talked about starting out with a small start up
18 crew and then bumping it up towards the middle when
19 we got all the equipment. But what happened in
20 reality, we didn't have enough equipment for the
21 crew I had.
22 Q. Well, I can appreciate the changes that
23 occurred.
24 But at the beginning when you wrote up

1 this contract and you had some idea about whether
2 or not you were going to make a profit -- because
3 you wouldn't do this for free, would you?
4 A. Oh, no, but I would do it for break even
5 on the assumption -- or on the gimme that we were
6 going to get more work. That Indianapolis job
7 looked to be very lucrative.
8 Q. Is it true that really you cared only
9 about that Indiana -- Indiana job?
10 A. Oh, no. I cared about trying to do
11 something on my own with Tomas. I mean, I --
12 Q. Did you care about this particular job,
13 the Cleveland Trencher job?
14 A. Of course. I care about every job I do.
15 Q. Okay.
16 What -- if the labor would not be
17 40 percent, what would it be because of Tomas's
18 treatment of laborers?
19 A. Because of his treatment of laborers? I
20 don't know what he -- I'm assuming that he at least
21 paid these guys \$15 an hour.
22 Q. Well, what would a laborer get as a union?
23 A. Well, twice that.
24 Q. So \$30 per hour, right?

1 A. Yes.

2 Q. So is it fair to say that instead of 40

3 percent, the labor would be 20 percent of the total

4 cost? Is that fair?

5 A. Probably.

6 Q. Okay.

7 So 20 percent of \$50,000 is \$10,000.

8 Do you agree with that?

9 A. Yes.

10 Q. And then 15 percent for the waste would be

11 \$7,500, correct?

12 A. Yes, but this is where the problem

13 started.

14 Q. I understand that problems arose.

15 I just mean at the time you wrote this

16 contract if you had to assess the breakdown which

17 you would want to do, right?

18 A. Yes. I had a breakdown sheet. I'm trying

19 to think in my head what I -- what I did but --

20 Q. Well, we'll break it down and you tell me

21 if you agree?

22 A. Okay. Go ahead. Keep going.

23 Q. So \$10,000 for labor, \$7,500 for waste?

24 A. Yep.

1 Q. \$7,500 for hauling?

2 A. Uh-huh.

3 Q. Okay.

4 Any other expenses?

5 A. Equipment rental.

6 Q. What would the equipment cost, what

7 percent of that 50 or of the job?

8 A. 10 percent.

9 Q. So that's \$5,000.

10 Any other costs?

11 A. Materials, bags, poly, everything involved

12 in asbestos abatement. Some of it's reusable.

13 Most of it -- let's just go with disposables. 10

14 percent minimum on disposables.

15 Q. Okay. All right. So \$5,000 for that.

16 Any other costs?

17 A. Tools, another 5 percent on tools.

18 Q. Okay.

19 So \$2,500?

20 A. Right.

21 Q. Any other costs?

22 A. Well, putting the guys up and feeding them

23 and things of that nature but Mike shared that

24 burden.

1 Q. Was that in the contract?

2 A. No. I don't think I wrote it. I think --

3 I think we just agreed on that because he went

4 ahead and set it up so.

5 Q. So that was not an expense or if it was,

6 it was nominal, correct?

7 A. But I didn't know that for sure that he

8 was going to do that. You know, he talked like he

9 was going to do it but I had to cover the bases

10 just in case so.

11 Q. Well, what did you cover those as?

12 A. Well, I figured --

13 Q. Room and board?

14 A. -- two guys a night for the -- for the

15 week, you know, at \$100 a room times five, \$500 a

16 night times five, \$2,500 for the first week,

17 another \$5,000.

18 Q. Any other costs?

19 A. What I am missing?

20 Q. We have labor, waste, hauling, equipment,

21 materials, tools, and room and board.

22 A. Oh, transportation.

23 Q. Okay.

24 A. My costs and Tomas's and the trucks back

1 and forth from Chicago -- or from Hammond at figure

2 300 -- figure 700 miles a round trip. And I made

3 several trips with Tomas, without Tomas, with the

4 truck and the truck coming back at least twice for

5 equipment. So you got to figure each trip add at

6 least \$150. So figure 15 trips about. Put a

7 couple grand on transportation.

8 Q. And you could have saved a bulk of that if

9 you had just stayed in Euclid yourself, correct?

10 A. No, because I would have been paying more

11 on the per diem or the motel. It would have been

12 another -- I did stay in the motel one night.

13 Q. All right.

14 If I may add your figures up here, \$10,000

15 for labor, \$7,500 for waste, \$7,500 for hauling,

16 \$5,000 for equipment, \$5,000 for tools, \$5,000 for

17 room and board and \$2,000 for transportation we'll

18 be generous and give you \$2,500 for transportation,

19 that comes to \$45,000. That leaves \$5,000 left for

20 you and Tomas Amaya to split; is that correct?

21 A. Yes. If it rolled that way but it didn't.

22 Q. If it rolled that way, correct?

23 A. Yes.

24 Q. Now, if Safe Environment is going to make

1 a cut, which is what you assumed, that now becomes
 2 substantial in terms of whether or not you get
 3 \$2,500 or zero, doesn't it?
 4 A. No. That -- whatever arrangement that
 5 might have been made between Safe and Tomas was not
 6 discussed with me.
 7 Q. Did you ever bring it up?
 8 A. Nope.
 9 Q. If your estimate that you put together in
 10 your chart is consistent with what you've testified
 11 right now, it matters whether or not you take any
 12 money from this thing or not, doesn't it?
 13 A. It matters?
 14 Q. Does it?
 15 A. Well, Tomas might have absorbed the cost
 16 himself.
 17 Q. Okay.
 18 Would that be something that you'd want to
 19 know?
 20 A. If -- if he did and I got paid, great. If
 21 I got paid just a finder's fee at that point which
 22 that's what I was shooting for at that point
 23 because I didn't want to go into business with
 24 Tomas. This was going to be a trial and it failed

1 miserably. And I had no intentions of going into
 2 business with Tomas because he started talking
 3 about me paying rent towards his apartment building
 4 where my office was going to be and I said, Tomas,
 5 that's not a business. That's --
 6 Q. When did you have enough and back out?
 7 A. When did I have enough money? I never had
 8 any money.
 9 Q. When did you have enough of Tomas's method
 10 of doing business where you realized that --
 11 A. That he couldn't run -- he couldn't run a
 12 business?
 13 Q. Right.
 14 A. Right after I seen the aftermath of the
 15 friable.
 16 Q. Okay.
 17 But you stayed for that, didn't you? You
 18 stayed for all of phase two, didn't you?
 19 A. No.
 20 Q. You bowed out during phase two?
 21 A. I -- well, I was still talking to Tomas
 22 but after that incident, after they did the friable
 23 removal and we had the EPA shut the site down, I
 24 was trying to explain to Tomas that he does not

1 have an option to clean up. He thought he did. I
 2 says you do not have an option because now, Tony is
 3 saying that he didn't give you permission to use
 4 the license so you no longer have a license.
 5 Q. You learned as the project with Nationwide
 6 went on that Tomas couldn't run a business; is that
 7 correct?
 8 A. Well, yes.
 9 Q. Okay.
 10 And you testified that when you were his
 11 supervisor at other jobs and throughout the years
 12 that you didn't trust his approach to doing these
 13 jobs; is that correct?
 14 MR. KRAMER: Objection.
 15 THE WITNESS: No. I thought he was a good
 16 foreman. Again, he -- you know, he gave every
 17 indication that he could be professional and he
 18 could run a job. I just think this was a little
 19 bit over his head. He was trying to run it with a
 20 credit card. I think he got out off and didn't
 21 want to tell me. Then he was trying use his own
 22 money that he was making on the side working for --
 23 or making -- as working for Tony. And I think he
 24 was putting everything into it to save a dying job

1 that should have been shot.
 2 MR. THOMAS: Okay.
 3 THE WITNESS: At the -- at the very least, he
 4 should have come to me or talked with Mike. I
 5 tried to put in for a change order but Mike at that
 6 time was basing his money on he can't get paid
 7 until he gets more steel out of there. I'm trying
 8 to tell him you can't take any more steel out of
 9 there until we get finished.
 10 BY MR. THOMAS:
 11 Q. Who is the person who gave clearance to
 12 Nationwide, was that you or Tomas, that the phase
 13 two was complete and that the building could be
 14 demolished in its entirety?
 15 A. It wasn't me because I wasn't there
 16 when -- when it was finished.
 17 Q. Okay.
 18 THE VIDEOGRAPHER: We have five minutes right
 19 now.
 20 MR. THOMAS: You want to change the tape?
 21 THE VIDEOGRAPHER: Yeah. This marks the end of
 22 tape number two. We are off the record at
 23 3:51 p.m.
 24 (A short break was taken.)

1 THE VIDEOGRAPHER: This marks the beginning of
 2 tape number three. We are back on the record at
 3 3:54 p.m.
 4 BY MR. THOMAS:
 5 Q. John, I had asked you about Exhibit 6
 6 which you testified that you have not seen and you
 7 did not fill out; is that correct?
 8 A. That's correct.
 9 Q. Because this appears to have been typed
 10 and you don't type, you write; is that correct?
 11 A. That's correct.
 12 Q. Okay.
 13 Would you ever have typed out a form?
 14 A. No.
 15 Q. Okay.
 16 Do you know what the date of this form is?
 17 Do you see that bottom right? At least by whomever
 18 filled that out.
 19 A. Date, August 31st.
 20 Q. Okay. Thanks. I want to hand you
 21 Exhibit 7, have you take a look at that. Let me
 22 know when you're finished with that.
 23 Do you recognize that document?
 24 A. I recognize the information on the

1 document.
 2 Q. Okay.
 3 This is an -- a prior notification, this
 4 is a ten-day form, correct?
 5 A. Yes.
 6 Q. It's similar to Exhibit 8 but it differs
 7 in terms of the information, correct?
 8 A. Yes.
 9 Q. Did you fill out this form in Exhibit 7?
 10 A. The one I'm looking at right now?
 11 Q. Yes.
 12 Well, how about this, have you ever seen
 13 that particular document filled out before?
 14 A. Yes.
 15 Q. When did you see it?
 16 A. I -- I don't recall but it looks like
 17 August 31st.
 18 Q. Okay.
 19 Well, that's the date of the form,
 20 correct?
 21 A. Yes.
 22 Q. Did you fill that out?
 23 A. No, but it looks like I faxed it.
 24 Q. Well, let's -- let's focus on the form

1 itself.
 2 A. Okay.
 3 Q. Okay.
 4 Who filled that form out?
 5 A. Again, it's typed so I -- I don't -- I
 6 don't know if my -- can I use -- just look at this
 7 one again?
 8 Q. Sure can.
 9 A. The font is even different.
 10 Q. Do you know who filled out seven,
 11 Exhibit 7?
 12 A. Exhibit 7? Produced by Nationwide. It
 13 looks like Nationwide.
 14 Q. Well, don't be confused by that. That is
 15 a -- something that happens -- this is called a
 16 Bate's number. So during the course of this civil
 17 action, different parties send things and that's
 18 how different lawyers keep track of documents,
 19 okay?
 20 A. Okay.
 21 Q. So you can accept that this was produced
 22 by Nationwide as part of this litigation.
 23 A. Okay.
 24 Q. But I don't want that to get in the way of

1 your assessment of the form if you can help that.
 2 A. Okay.
 3 This looks like information -- it looks
 4 like this is something Molly may have gave -- given
 5 me and then this is --
 6 Q. Now, this -- and you're talking about six,
 7 correct, Exhibit 8?
 8 A. Six, yeah. And then this looks like
 9 changes I may have made and then sent back to her.
 10 Q. Okay.
 11 So you made this form, didn't you?
 12 A. 8-31-2007. This was faxed to myself. I
 13 don't know.
 14 Q. Is it fair to say that you -- you're very
 15 interested in the fax information at the top of
 16 this page? You've mentioned it twice. Are you
 17 interested in studying that, you want to look at
 18 that for a bit and think or are you able to answer
 19 questions about the document itself without
 20 focusing on that fax information?
 21 A. That fax is driving me crazy. I'm trying
 22 to figure out who I faxed this too.
 23 Q. Well, can you not do that for a moment and
 24 just answer questions about the form itself and

1 then -- then I'll let you look at that and you can
 2 think about the fax?
 3 A. Sure.
 4 Q. Okay.
 5 Who filled out this form?
 6 A. Well, I put most of the information that I
 7 received from various people on this form.
 8 Q. Did you fill that form out?
 9 A. Person -- yes, but I don't remember typing
 10 it in. I remember doing it by hand. And then -- I
 11 don't remember typing -- I don't have the
 12 capability to type it.
 13 Q. What does that mean, you don't have a
 14 typewriter?
 15 A. No, I don't.
 16 Q. Can this form be filled out as a PDF?
 17 A. It doesn't look like it.
 18 Q. Well, let me draw your attention to the
 19 answer for the address in section nine where it
 20 says 20100 St. Claire Avenue.
 21 Do you see that?
 22 A. Yes.
 23 Q. And then below that, there is a location,
 24 site location specified and then there's

1 information that says manufacturing building
 2 southeast of main brick office, et cetera.
 3 Do you see that?
 4 A. Yes.
 5 Q. Does that look like a different font than
 6 the St. Claire Avenue right above it?
 7 A. It looks like it went smaller to fit it
 8 in.
 9 Q. Okay.
 10 And isn't that what happens when a
 11 document is PDF filled out?
 12 MR. KRAMER: Objection.
 13 THE WITNESS: I don't know.
 14 MR. THOMAS: Okay.
 15 BY MR. THOMAS:
 16 Q. How about when somebody uses a typewriter,
 17 does a typewriter make a different sized font?
 18 A. You can see that the dates here are going
 19 off the line. They're going uphill. That looks
 20 more like a typewriter.
 21 Q. Okay.
 22 A. But I mean, I've -- also, they're
 23 going there up and down on the days 7:00 a.m. to
 24 5:00 p.m.

1 Q. Okay.
 2 A. They're pretty square until you get to the
 3 last one, it's hitting the line.
 4 Q. Okay.
 5 So I'll ask you again, did you fill this
 6 form out?
 7 A. No.
 8 Q. Who did?
 9 A. I don't know. It could have been -- I
 10 don't want to speculate because I don't know.
 11 Q. Okay.
 12 Well, could it have been you?
 13 A. Could have been, sure.
 14 Q. Do you have any recollection of that form?
 15 A. Yes. I recognize all the information on
 16 here.
 17 Q. Is that form important?
 18 A. It's important to start the job, yes.
 19 Q. Can you do the job without that form?
 20 A. No.
 21 Q. And yet you don't remember that form?
 22 A. I remember it being part of the package,
 23 yes.
 24 Q. But you don't remember if you filled that

1 out?
 2 A. No. It's got all the correct information
 3 on it, though, I mean.
 4 Q. Well, let's talk about the correct
 5 information.
 6 What does it say for number eight,
 7 certification number, what's that number?
 8 A. AS29688.
 9 Q. That's a certification number for whom?
 10 A. Carlos Bonilla.
 11 Q. Who wrote that in there?
 12 A. I would have.
 13 Q. Okay.
 14 Who told you to write that in there?
 15 A. Tomas.
 16 Q. When did he tell you to do that?
 17 A. When he gave me a copy of his license and
 18 said this is -- use Carlos as the foreman.
 19 Q. Did you ask him if Carlos gave permission?
 20 A. Nope.
 21 Q. Why not?
 22 A. Because this was Tomas's friend and
 23 confidante and worker, foreman. They worked
 24 together all the time. I didn't figure it was a

1 problem.

2 Q. Did you figure it was a problem when phase

3 two began and Carlos Bonilla was nowhere to be

4 found?

5 A. No --

6 MR. KRAMER: Objection.

7 THE WITNESS: -- because I knew that Carlos --

8 I had seen Carlos at Tony's job. I know Carlos

9 either lives in Indianapolis or commutes between

10 Indianapolis and Hessville.

11 BY MR. THOMAS:

12 Q. Well, as you said, he's Tomas's confidant

13 and friend so he would probably be in that area but

14 did you see him at the Euclid, Ohio, Cleveland

15 Trencher area?

16 A. I've never seen him there, no, but that

17 doesn't mean he wasn't there.

18 Q. Oh, you think he may have been there?

19 A. He might have been.

20 Q. Okay.

21 A. I mean, you know, sometimes foremen get

22 switched around, especially when they were going

23 between jobs. They were running another job for

24 Safe Environment while this was going on.

1 Q. Going back to Exhibit 6, Tomas Amaya

2 testified that you filled out this form, that he

3 did not?

4 A. Right.

5 Q. Is he correct?

6 A. I filled out that form but I did not type

7 that form out.

8 Q. Okay.

9 So when you filled it out, did you write

10 Anthony Paganelli's information in there?

11 A. I was going off the license, yes.

12 Q. And why did that get changed from Anthony

13 Paganelli to you? Who authorized that change?

14 A. I don't know.

15 Q. Do you find it peculiar?

16 A. No.

17 Q. Do you think that Tomas Amaya would have

18 substituted Anthony's name and added yours?

19 MR. KRAMER: Objection, calls for speculation.

20 THE WITNESS: Well, I don't -- I don't know why

21 he would do that because I'm not the holder of the

22 license.

23 MR. THOMAS: Okay.

24

1 BY MR. THOMAS:

2 Q. Well, did you do that?

3 A. No.

4 Q. So you didn't fill out this form which is

5 Exhibit 7?

6 A. No. I acquired some or all of the

7 information here.

8 Q. Are you the appropriate person to be

9 listed as the holder of the Safe Environmental

10 license?

11 A. No.

12 Q. Were you concerned about that when you

13 looked at it?

14 A. Wait. I could be the contact. That's --

15 I've been the contact for LVI's license.

16 Q. Okay.

17 Who made the decision to change the

18 contact person from Paganelli to Vadas?

19 A. I don't know.

20 Q. Who made the decision to change the name

21 of the person filing this notice from Paganelli to

22 Vadas?

23 A. I'm not sure that this was the one that

24 was filed. That might have been the one that was

1 filed.

2 Q. Did you ever look?

3 A. No.

4 Q. Did you care?

5 A. Well, of course I cared but there were so

6 many other things that were coming up. I was more

7 concerned with the on-site work.

8 Q. Is this not the most important document in

9 order to do the job?

10 A. The license -- having the license in hand

11 is the most important document. This is a

12 notification.

13 Q. Okay.

14 A. These get changed. And I've had stacks of

15 them on my desk on jobs before. As a matter of

16 fact, there's --

17 Q. What is more important, having the license

18 in your hand or filing this form with the

19 Department of Health?

20 A. They're equally just as important. But,

21 again, you're -- you're missing revisions that I

22 know I filled out. There's numbers that aren't

23 there.

24 Q. Where are those revisions?

1 A. I have no idea.

2 Q. Well, when you filled out those numbers,

3 where did you send those completed forms?

4 A. Gave them to Tomas.

5 Q. How did you get them to him?

6 A. Handed them to him, here's the revisions

7 for the project.

8 Q. What determines whether or not you would

9 fax something or hand something to Tomas?

10 A. Logistics. If I'm at home, I might just

11 go over there and give it to him. If he's at work,

12 I would fax it so that when he came home, he would

13 see it on his fax machine. There's a dozen reasons

14 why I would fax something. But you don't typically

15 fax-- I mean, you could fax a notification but

16 you're supposed to mail it with registered mail so

17 you have proof that it was mailed on the date so

18 you can start counting your days.

19 Q. Who did that in this case?

20 A. That would have to be Tomas.

21 Q. Okay.

22 Tomas said you did it.

23 Is he wrong?

24 A. He's wrong. I didn't do it.

1 Q. How can we find out who did it?

2 A. Look -- the Department of Health or --

3 well, it went to somebody so they have a record of

4 it.

5 Q. Okay.

6 And would you be surprised if you -- if we

7 found out that the Department of Health showed you

8 as the remitter?

9 A. Would I be surprised?

10 Q. Yes.

11 A. I don't think you're going to find me as

12 the remitter.

13 Q. And if we did, would that be something

14 that's acceptable to you? Would you agree that you

15 did it?

16 MR. KRAMER: Objection, calls for speculation.

17 THE WITNESS: I don't think I would have done

18 it.

19 MR. THOMAS: Okay.

20 THE WITNESS: Again, I was asked to get this

21 thing rolling and --

22 BY MR. THOMAS:

23 Q. Who are the possible people who could have

24 submitted this form to the Department of Health?

1 A. Oh, man.

2 Q. You're one, correct?

3 A. I'm one. Tomas is one.

4 Q. Tomas is one.

5 Who else?

6 A. Molly.

7 Q. Okay.

8 A. The information that I needed from Mike.

9 Mike could have even -- but no, Mike's not a

10 paperwork guy.

11 Q. If Mike or Molly submitted this form to

12 the Department of Health, did they have your

13 authority to use your name?

14 A. Nobody has authority to use my name.

15 Q. So if it turns out you're the person who

16 did not fill this form out, does this upset you

17 that your name was used in relation to the Safe

18 Environment certificate?

19 A. Yes.

20 MR. KRAMER: Objection.

21 MR. THOMAS: Okay.

22 BY MR. THOMAS:

23 Q. And why does it upset you?

24 A. Well, because my name was put in there. I

1 don't believe I gave anybody permission to do that.

2 Q. And you certainly didn't give anyone

3 permission to align you with Safe Environment, did

4 you?

5 A. No.

6 MR. KRAMER: Objection.

7 THE WITNESS: I don't work for Safe

8 Environment.

9 MR. THOMAS: Okay.

10 BY MR. THOMAS:

11 Q. And you never had any personal contact

12 with Safe Environment to verify whether or not

13 their license was provided, is that correct?

14 A. No, I didn't talk with Safe at all.

15 Q. If you had seen that form, since you claim

16 you didn't, and you saw your name associated with

17 Safe Environment, would you correct it?

18 MR. KRAMER: Objection.

19 THE WITNESS: It depends where the form was

20 going.

21 MR. THOMAS: Well, it would be going to the

22 Ohio Department of Health.

23 THE WITNESS: No, I wouldn't let this go.

24

1 BY MR. THOMAS:
 2 Q. But you faxed that somewhere, didn't you?
 3 A. Yes. Late at night.
 4 Q. So you did let it go, didn't you?
 5 A. No.
 6 Q. How do you describe that discrepancy?
 7 A. Well, I wouldn't have sent it at night.
 8 Q. Well, when did you send it?
 9 A. I didn't send it.
 10 Q. Did somebody else use your fax machine?
 11 A. No. I'm not sure that this fax -- just
 12 because my fax number is on here doesn't mean I
 13 faxed it to the Department of Public Health. I
 14 could have faxed this to Tomas's office.
 15 Q. Would you have done that?
 16 A. I might have.
 17 Q. Why would you submit to Tomas a
 18 notification with your name as the contact person
 19 for Safe Environment when you just told us that you
 20 would not authorize that?
 21 MR. KRAMER: Objection.
 22 THE WITNESS: I don't know. One says original.
 23 They both say original. One doesn't have the
 24 number on it.

1 BY MR. THOMAS:
 2 Q. I can give you copies of these so that you
 3 can compare them later on but I want to make sure
 4 that you're focused on the questions that I'm
 5 asking about the one that's faxed.
 6 Did you fax that or not?
 7 A. I don't know.
 8 Q. Okay.
 9 Did you ever send any faxes?
 10 A. I sent lots of faxes.
 11 Q. Okay.
 12 To whom and why?
 13 A. Molly, Mike for information. I usually
 14 had to chase them down to try to get any kind of
 15 information. It was hard to get a hold of either
 16 of them on the phone to talk with them so I would
 17 usually fax them and wait for faxes back, period.
 18 Q. Okay.
 19 When you faxed Mike and Molly, did you
 20 represent yourself as different -- excuse me --
 21 I'll rephrase that question.
 22 When you faxed Mike and Molly, did you
 23 make a different representation about yourself than
 24 when you faxed a governmental authority?

1 A. I don't understand what you're asking me.
 2 When I faxed Mike and Molly? It depends what I
 3 faxed them. I faxed Mike and Molly things about
 4 any questions that might have been on their mind
 5 about -- we had conversations about the
 6 Indianapolis job. We had conversations about a lot
 7 of things but this in particular, I don't recall.
 8 Q. What do you consider your legal -- what do
 9 you consider was your legal relationship with Tomas
 10 Amaya for the Cleveland Trencher job?
 11 MR. KRAMER: Objection.
 12 MR. THOMAS: I'll rephrase that question.
 13 BY MR. THOMAS:
 14 Q. What do you consider your contractual
 15 relationship?
 16 A. We had no contract. I was doing him a
 17 favor.
 18 Q. This job was an entire favor, wasn't it?
 19 A. Well, it started out to be a favor and --
 20 Q. Started out to be a favor and how did it
 21 end up?
 22 A. Well, pretty poorly, obviously.
 23 Q. Was it ever a business enterprise for you?
 24 A. No.

1 Q. Did you ever have any concern about the
 2 business end of it?
 3 A. Yes, like why did I get involved in this
 4 to start out with.
 5 Q. I mean, at the beginning, did you ever
 6 have any business interest in the Cleveland
 7 Trencher job?
 8 A. Yes. I had high hopes that, you know,
 9 this would work. He guaranteed me that he had guys
 10 that could pull this off and that's it.
 11 Q. Who guaranteed you that?
 12 A. Tomas.
 13 Q. Okay.
 14 A. I said, you know, we're going to need some
 15 good guys. He says he's got a hall down in
 16 Indianapolis where he can get all the guys that are
 17 licensed and he told me the cost was very
 18 productive and we can get -- get the work done.
 19 He -- he was the one making all the comments that
 20 it could be done.
 21 Q. When did -- when did Tomas -- when did
 22 Tomas Amaya confirm for you that -- that -- that
 23 Safe Environment's license would be used?
 24 A. When we were pressured by Mike to get

1 started on the friable because we were running out
 2 of time and work and he says we're going to have to
 3 use Tony's license.
 4 Q. Okay.
 5 A. Period.
 6 Q. Okay.
 7 He said we're going to have to use Tony's
 8 license, correct?
 9 A. Yes.
 10 Q. Okay.
 11 And the pressure was high from Mike,
 12 wasn't it?
 13 A. Very.
 14 Q. In fact, it was so high that you weren't
 15 going to question whether or not using Tony's
 16 license was valid, right?
 17 MR. KRAMER: Objection.
 18 BY MR. THOMAS:
 19 Q. Isn't that right?
 20 A. Well, I used his license -- I had a valid
 21 license in my hand. I didn't see any other way I
 22 can have a valid license without the owner's
 23 permission.
 24 Q. Well, it would have been possible for

1 Tomas to just give you that license and tell you
 2 that it was given to him?
 3 A. How can he get that without -- I mean, the
 4 State surely would have sent some type of
 5 notification back that they received it.
 6 Q. Let's talk about that.
 7 Does the State send notification back?
 8 A. They do in Illinois.
 9 Q. Do they in Ohio?
 10 A. I don't know.
 11 Q. Do they in Indiana?
 12 A. I don't know.
 13 Q. Do they in Virginia?
 14 A. I don't know.
 15 Q. Do they in Missouri?
 16 A. No. These --
 17 Q. Do they in South Carolina?
 18 A. I don't know.
 19 Q. Then how do you draw the conclusion that
 20 you would get notification back from the State on
 21 this license?
 22 A. There's a possibility.
 23 Q. Just a possibility, right?
 24 A. Yes.

1 Q. But it's not for certain, is it?
 2 A. No.
 3 Q. And you knew that at the time too, right?
 4 A. Well, yeah, but --
 5 Q. And you testified earlier this morning
 6 that as a project -- as a supervisor on many of
 7 these sites, you've got a stack of paper for each
 8 worker, don't you?
 9 A. Yes.
 10 Q. Including a copy of their asbestos license
 11 card, right?
 12 A. Yes.
 13 Q. And their driver's license card, right?
 14 A. Yes.
 15 Q. And you have a copy of the certificate for
 16 the contractor's license for your company, don't
 17 you?
 18 A. As a supervisor, yes. I was not a
 19 supervisor on this project.
 20 Q. Okay. Well, I'm not asking you if you
 21 were.
 22 I'm saying that copies of documents are
 23 available to supervisors on certain jobs, aren't
 24 they?

1 A. Yes.
 2 Q. And you know that, don't you?
 3 A. Yes, I do.
 4 Q. So you agree with me that Tomas Amaya
 5 might have a copy of a license in his hand when he,
 6 in fact, did not receive that from anybody, right?
 7 MR. KRAMER: Objection.
 8 THE WITNESS: That -- the business license is
 9 very seldom loosely given to foremen.
 10 MR. THOMAS: Okay.
 11 THE WITNESS: That is something that if
 12 somebody comes on site and wants to see the
 13 license, they're referred to the office.
 14 MR. THOMAS: Okay.
 15 THE WITNESS: It's something that doesn't have
 16 to be posted. It doesn't have to be provided.
 17 BY MR. THOMAS:
 18 Q. So the contractor's license was provided
 19 to you from Tomas at the time when the pressure was
 20 high to start phase two, right?
 21 A. It was provided at the time when we didn't
 22 have one.
 23 Q. Which was when?
 24 A. When it was time to start the friable

1 ten-day notification.

2 Q. Okay.

3 Which was when? When would that have

4 been?

5 A. September 14th.

6 Q. Where do you get that date?

7 A. Right there.

8 Q. Okay.

9 A. September 13th, September 14th,

10 September 22nd.

11 Q. Now, that was the original date that you

12 were supposed -- that you were supposed to do phase

13 two, correct?

14 A. Yes.

15 Q. But that changed because of the pressure

16 from Mike Collins, correct?

17 A. Well, I don't know.

18 Q. You don't remember?

19 A. No, I don't.

20 Q. Did that pressure from Mike change the

21 date that phase two was to begin?

22 A. No.

23 Q. Okay.

24 So everything was still on schedule from

1 the beginning?

2 A. Yes. It should start on -- whenever the

3 ten-day says it starts, that's the day it starts.

4 Q. Do you know what was significant about

5 August 31, 2007? Did something happen on that day?

6 A. Sox won the World Series. Oh, that was

7 '05. I don't know.

8 Q. Okay.

9 Was there during this project anything --

10 any day that stands out in your mind as being a

11 rush day or hurry day or a significant day?

12 A. No. They were all rushed days,

13 significant and hurry. It was hot. It was -- we

14 were under -- under a lot of pressure. These guys

15 were putting in ten, 12-hour days.

16 Q. Well, there was a lull between phase one

17 and phase two, right?

18 A. There was some -- yeah, some down days.

19 Q. How many down days?

20 A. I don't know.

21 Q. Okay.

22 And you don't recall anything occurring on

23 August 31, 2007?

24 A. No.

1 Q. Would you agree with me that both of these

2 forms, six and seven, both notifications, were

3 filled out on August 31, 2007?

4 A. That's what it says, yes.

5 Q. Okay.

6 And you don't recognize six, correct?

7 A. No.

8 Q. But you do recognize seven, correct?

9 A. Again, I recognize the information on

10 there but I don't recognize filling that out only

11 because of the way it's filled out.

12 Q. But you agree also that you at least

13 physically held that document because you faxed it

14 to somebody, right?

15 A. Right. It might have been just in a --

16 you know, this needs to go to --

17 Q. Could have been to anyone, right?

18 A. Could have been to Mike.

19 Q. Could have been to Mike, could have been

20 to Tomas, could have been to the State of Ohio,

21 right?

22 A. I doubt if it was to the State. I

23 wouldn't -- it says 1748, the time. I wouldn't fax

24 it to the State at that time.

1 Q. That's 5:48 p.m., right?

2 A. Yeah. I wouldn't have done that.

3 Q. Okay.

4 In any case, you don't approve of having

5 your name listed as the contact person for Safe

6 Environment, you've determined that, right?

7 A. Well, I don't -- I'm looking at it now. I

8 don't -- no, I don't agree with my name being there

9 because it's not my license. But I don't think it

10 matters because it says contact and being a contact

11 person that can be construed as, well, who's the --

12 who's the contact?

13 Q. Contact for what, for the license or the

14 job?

15 A. The job.

16 Q. Okay.

17 You're saying that this line right here in

18 line seven, the third one down where it says

19 contact, your -- your take is that contact is

20 contact for the job, not contact for the licensure?

21 A. It could be.

22 Q. Well, is it?

23 A. No.

24 Q. That contact person, that's for

1 section seven, correct?

2 A. It looks like it.

3 Q. And the contact person would be the person

4 who verifies and is answerable to that license,

5 correct?

6 MR. KRAMER: Objection, calls for speculation.

7 BY MR. THOMAS:

8 Q. Is that true?

9 A. I don't know. I mean --

10 Q. Is that logical?

11 MR. KRAMER: Objection.

12 THE WITNESS: A lot of these forms aren't

13 logical. I mean, you've got three different --

14 four different types of material here and we did

15 surface -- you've got glove bag, you've got AFD,

16 engineering controls.

17 BY MR. THOMAS:

18 Q. So if the form isn't logical, you just put

19 down what you --

20 A. Well, your best guess, you know. Again,

21 this was my first time at, you know, trying to be a

22 project manager for a guy who was trying to start a

23 business.

24 Q. And that's what you've said, that this was

1 your first time.

2 Did you call anybody from the Ohio

3 Department of Health for assistance with this form?

4 A. No.

5 Q. Okay.

6 I want to ask you about Exhibit 14, the

7 first page here. I just want you to look at the

8 first page.

9 This is a fax, is it not?

10 A. Yes.

11 Q. And that's a fax that was sent by you, is

12 it not?

13 A. It looks to be.

14 Q. Okay.

15 And what's the date of the fax?

16 A. August 15th.

17 Q. Okay.

18 And there's a section in the upper right.

19 It says a facsimile from and who is the fax from?

20 A. Facsimile from John Vadas, JVP Services,

21 Asbestek, Incorporated, my old phone number.

22 Q. That was a phone number that was active at

23 the time, is that correct?

24 A. Yes.

1 Q. Why did you put JPV Services?

2 A. Because that was the name of my old

3 company.

4 Q. Okay.

5 And did you then add Asbestek in a larger

6 font there?

7 A. Yes, because I didn't want her to get

8 confused with where this was coming from.

9 Q. Because this was coming from Asbestek,

10 right?

11 A. It was going to her regarding Asbestek,

12 yes.

13 Q. Okay.

14 In fact, this fax was sent doing business

15 by you for Asbestek, correct?

16 A. Ohio application for business, yes.

17 Q. You weren't doing any work for JPV when

18 you sent this fax?

19 A. No.

20 Q. Okay.

21 At the bottom of the fax, you also

22 indicate your old phone number, correct?

23 A. No. That's Asbestek's phone number.

24 Q. Okay.

1 So you put Asbestek's phone number?

2 A. Yes.

3 Q. And you put Asbestek's fax number?

4 A. Yes.

5 Q. Okay.

6 But you also have written here your JPC--

7 JPV Services cell phone, correct?

8 A. Right.

9 Q. And your fax number?

10 A. Yes.

11 Q. So were you doing work for JPV when you

12 sent this fax?

13 A. No.

14 Q. You did put your website as well on here,

15 JPVServices.com?

16 A. It doesn't exist anymore.

17 Q. Fair enough.

18 But at the time, it did exist, right?

19 A. Yes.

20 Q. And you typed these things in, your JPV

21 information after you wrote the letter, didn't you?

22 A. No. I -- I typed all that at the same

23 time. What do you mean after I wrote the letter?

24 Q. Well, so you -- you typed -- in the

1 comment section, you write a letter to Molly,
 2 right?
 3 A. Yes.
 4 Q. And at the end, you write thanks, John
 5 Vadas, right?
 6 A. Yes.
 7 Q. And then you type in my e-mail address and
 8 my website, www.JPVServices.com, right?
 9 A. Yes. Okay.
 10 Q. Then you put the JVP Services cell phone?
 11 A. Right.
 12 Q. And then the JVP Services fax number?
 13 A. Some of this might have been already in --
 14 programmed in Word.
 15 Q. Okay.
 16 A. And that's why Asbestek's coming up last.
 17 Q. Okay.
 18 A. So it -- when I sign something, it
 19 automatically shoots this stuff in there.
 20 Q. I see.
 21 And then you added the Asbestek so that
 22 there would be no confusion?
 23 A. Yeah. Right. Yeah.
 24 Now, you can see here what I say, I still

1 need a copy of the asbestos report on the Euclid
 2 property. I never got that. Mike said he was
 3 going to go over it to go overnight it but it -- we
 4 still have not received it. Could you please look
 5 into getting us that info. We were getting for
 6 workers -- a lot -- I mean, it speaks for itself.
 7 Read it. I mean, I was begging them for
 8 information to get this thing going.
 9 Q. Okay.
 10 On page two, there's a fax sent by you on
 11 August 16th, is that correct?
 12 A. Yes.
 13 Q. This also went to Molly and Mike Collins,
 14 correct?
 15 A. That's right.
 16 Q. And then at the end, you have your
 17 signature line that you say may already have been
 18 there, is that correct?
 19 A. Yes.
 20 Q. Okay.
 21 And then there's a fax on August 23, 2007
 22 and this also is to Mike and Molly, correct?
 23 A. Yes.
 24 Q. With your signature, e-mail, fax number,

1 website?
 2 A. Yes.
 3 Can I -- can I read this just for a
 4 second?
 5 Q. I'll give you a chance in a minute. I'm
 6 just -- want to ask you some questions about your
 7 faxes in general.
 8 On August 24th, you send a fax number and
 9 this time, you remove JVP Services, correct?
 10 A. Yes.
 11 Q. You just have Asbestek on there, is that
 12 correct?
 13 A. Yes.
 14 Q. Okay.
 15 You still sign it John and you have your
 16 e-mail address, JVP Services website, your phone
 17 and fax and Asbestek's information at the bottom.
 18 This time, you add his name, correct?
 19 A. Yes.
 20 Q. All right.
 21 Any reason for that change to take off
 22 JVP?
 23 A. I don't know.
 24 Q. Did you white that out?

1 A. No.
 2 Q. You just didn't --
 3 A. Didn't type it in.
 4 Q. Just didn't type it in.
 5 Do you recall why you would not have?
 6 A. What's the difference? I don't really
 7 recall. I mean, it's -- I think I still signed it.
 8 JPV.
 9 Q. You did.
 10 A. It doesn't really matter. I mean,
 11 sometimes I just forget to do things.
 12 Q. Okay.
 13 Then you sent a fax to Mike and Molly on
 14 August 31st and you put your JVP back in?
 15 A. Yes.
 16 Q. At the top.
 17 And now you add Safe Environment under
 18 Asbestek.
 19 Do you see that?
 20 A. Yes.
 21 Q. Why did you do that?
 22 A. Probably since we were using their license
 23 so they wouldn't get confused on what was going on.
 24 Q. So who wouldn't get confused?

1 A. Mike and Molly.
 2 Q. Why would they be confused if you send
 3 your Asbestek information?
 4 A. I don't know.
 5 Q. Well, you're the one who put it.
 6 What was your reasoning?
 7 A. I put as much information as I could so
 8 that they would understand it's coming from me, my
 9 business which has nothing to do with Asbestek's -
 10 Asbestek's business which has nothing to do with
 11 Safe Environment's, period.
 12 Q. So Asbestek has nothing to do with Safe
 13 Environment, does it?
 14 A. No.
 15 Q. Okay.
 16 Now, you added Safe Environment but the
 17 phone number below it is your phone number, isn't
 18 it?
 19 A. Yes.
 20 Q. Why didn't you put Safe Environment's
 21 phone number under Safe Environment?
 22 A. Why would I do that? That's - they have
 23 no business with Safe Environment.
 24 Q. They have no business with Safe

1 Environment, do they?
 2 A. No.
 3 Q. Okay.
 4 So actually, it's more confusing to put
 5 Safe Environment there than it would be to leave it
 6 out, isn't that true?
 7 MR. KRAMER: Objection.
 8 THE WITNESS: Well, I don't know. I mean,
 9 again, it depends on what I - what I faxed.
 10 MR. THOMAS: I'll get that to you.
 11 BY MR. THOMAS:
 12 Q. Now, at the end of this fax under John
 13 Vadas with your e-mail address, your JPV website,
 14 your cell phone and your fax number, you put
 15 Asbestek information, right?
 16 A. Yes.
 17 Q. Now, you also add Safe Environment as a
 18 contact person?
 19 A. As a contact, yes.
 20 Q. All right.
 21 And you put Safe Environment, colon, (219)
 22 808-1882?
 23 A. Right.
 24 Q. Is that Safe Environment's number?

1 A. No.
 2 Q. Whose number is that?
 3 A. That's my cell number.
 4 Q. Why did you put your cell phone as a
 5 contact for Safe Environment?
 6 A. Again, they don't know who Safe
 7 Environment is.
 8 Q. Okay.
 9 Why don't they know?
 10 A. They never worked with Safe Environment.
 11 Q. Well, did you tell them who they were?
 12 A. They never asked.
 13 Q. Did you ever think about offering that
 14 information?
 15 A. That's why I put it there, that's - if
 16 you got questions, call that.
 17 Q. And who they would talk to?
 18 A. Me.
 19 Q. Right.
 20 But not anyone at Safe Environment, right?
 21 A. I would give them that information if they
 22 asked.
 23 Q. Why didn't you just save a step and put it
 24 right there?

1 A. I did on the other one.
 2 Q. You did this one, didn't you?
 3 A. I don't remember.
 4 Q. Well, you said I did on the other one.
 5 A. I don't remember doing it. And if I did,
 6 I don't remember when, if I gave it to Mike and
 7 Mary - Mike and Molly or if Tomas sent it.
 8 Q. See, that form was filled out but isn't it
 9 true that it was dangerous to send that because it
 10 had Safe Environment's contact information and if
 11 somebody were to call Safe Environment, they would
 12 say we don't have any work in Ohio?
 13 MR. KRAMER: Objection.
 14 BY MR. THOMAS:
 15 Q. Isn't that why that wasn't sent?
 16 MR. KRAMER: Objection.
 17 THE WITNESS: No.
 18 BY MR. THOMAS:
 19 Q. Then why wasn't that one sent? You just
 20 said -
 21 A. I don't know if it wasn't sent. Maybe it
 22 was.
 23 Q. Okay.
 24 Do you now -- having pointed that out to

1 us in your answer to reconciling this answer, you
 2 said I did on that one, does that now mean you
 3 filled this form out?
 4 A. I don't even know what you said.
 5 Q. Let me ask you again, on this fax that you
 6 sent on August 31, 2007, you added Safe Environment
 7 with your phone number underneath it, right?
 8 That's your business phone number, correct?
 9 A. That's my home phone number.
 10 Q. That's your home phone number.
 11 Then at the bottom, you wrote Safe
 12 Environment, colon, and you put your cell number?
 13 A. Okay.
 14 Q. Why didn't you put Safe Environment's
 15 phone number the way you did on this sheet?
 16 A. Because I'm an idiot. I don't know.
 17 Q. Okay.
 18 The next fax also sent on August 31, 2007,
 19 is directed to Sharon McDuffy.
 20 Do you know who she is?
 21 A. I was referred to her -- yes, she -- I
 22 believe she was working for the EPA. I talked with
 23 her one of my trips on the way home.
 24 Q. Okay.

1 And you sent her a fax?
 2 A. Yes. I kept in contact with the EPA.
 3 Q. And you removed Safe Environment from
 4 the --
 5 A. It's just not there. Removed, there, I
 6 don't know. I mean, it's -- the template is a
 7 template. It's a Word template.
 8 Q. Is this a template like this one? Do you
 9 see those two? Is that a template or is that a
 10 different type?
 11 A. Asbestek is not there or whatever.
 12 Q. Well, how about a facsimile from here on --
 13 A. It's a bigger font. Things change.
 14 Q. Who changed them?
 15 A. My computer when I -- when I put it in. I
 16 mean, it wasn't malicious. I didn't do it for any
 17 nefarious reason. I just did it.
 18 Q. Okay.
 19 There's another fax on August 31, 2007.
 20 A. I'm getting to the point where I'm getting
 21 really upset.
 22 Q. Well, I just want you to explain to us as
 23 best as you can these discrepancies because of --
 24 A. These discrepancies are bullshit.

1 Q. Well, who put these discrepancies --
 2 A. These discrepancies you're making a big
 3 deal over nothing.
 4 Q. Well --
 5 A. It's something that I did one day and
 6 something I didn't do the next day. I'm real
 7 goddamned sorry, okay? But it's nothing that I
 8 intended to do to be malicious or misguide or
 9 mislead anybody. Did you understand?
 10 Q. I'm trying to.
 11 A. Well, try to understand I had nothing to
 12 do with making anybody believe anything different.
 13 I gave as much information as I could to the EPA if
 14 anybody had asked a goddamn question including you.
 15 Now, keep asking some more questions about this and
 16 I'm done.
 17 Q. Well, the question that I have is why is
 18 it that when you have communications directed to
 19 Mike and Molly Collins, you represent Safe
 20 Environment and when you send information to the
 21 EPA, Safe Environment is not present?
 22 A. I have no idea. And, you know, there's
 23 even times I'll -- I pencil this in, plus cover
 24 EPA. I don't know. I was tired. I do a lot of

1 this stuff late at night. Who knows?
 2 But you're trying to make it sound like
 3 that I had underlying reasons for doing this.
 4 There was no rhyme or reason to it. If anything, I
 5 gave out a lot of information and I kept in contact
 6 with the EPA and everybody involved in this site.
 7 I kept in contact, gave them all the information I
 8 knew, never lied to a person, not a single person.
 9 Now, what do you want from me?
 10 Q. Did you ever send a fax later that year to
 11 the EPA saying that you had nothing at all ever to
 12 do with Asbestek?
 13 A. I had no contract with Asbestek. I had no
 14 paycheck from Asbestek. I was never paid. I had
 15 nothing but grief with Asbestek, okay? It was a
 16 bad decision to even consider going into business
 17 with them. I made a mistake. Yes, I might have.
 18 I don't remember.
 19 Q. Could one of those mistakes have been that
 20 you were aware that Safe Environment did not offer
 21 its license?
 22 MR. KRAMER: Objection.
 23 THE WITNESS: No. License, not licensed -- I
 24 had a license. That's all I know.

1 BY MR. THOMAS:
 2 Q. And who gave you that license?
 3 A. Tomas Amaya. I've told you that about six
 4 times now.
 5 Q. Okay.
 6 Do you think it's possible that that
 7 license was fraudulently obtained by Tomas Amaya?
 8 A. No, I don't.
 9 Q. Why not?
 10 A. Because that's not Tomas's style. I just
 11 don't believe he would do that for a job of this
 12 magnitude, of this low -- he knew it was a --
 13 wasn't a money maker. I don't think he would take
 14 that risk.
 15 Q. Okay.
 16 Is it possible that Tomas Amaya
 17 fraudulently obtained that license?
 18 MR. KRAMER: Objection, asked and answered.
 19 THE WITNESS: I have no idea. I don't know
 20 their -- I worked for them for two years and I
 21 never even knew where their licenses were kept.
 22 How would Tomas? And I was in the office every
 23 day.
 24

1 BY MR. THOMAS:
 2 Q. I'd like you to take a look at Exhibit 18.
 3 You can -- there are three pages. Take your time.
 4 Let me know when you're finished.
 5 A. Carlos's paperwork, the State of Ohio
 6 Department of Health asbestos license, a valid
 7 license from Tomas Amaya faxed to -- well, it was
 8 faxed to Tomas Amaya.
 9 Q. By whom?
 10 A. I don't know. I have no idea.
 11 Q. What's on the first two pages?
 12 A. Okay. I faxed it to him I guess for his
 13 paperwork.
 14 Q. Okay.
 15 What did you fax him?
 16 A. Carlos Bonilla's supervisor refresher, a
 17 picture of his license for Ohio as a specialist and
 18 a copy of Safe Environment's license.
 19 Q. Okay.
 20 And you faxed those to Tomas Amaya, didn't
 21 you?
 22 A. Yes, I did.
 23 Q. Where did you get them?
 24 A. From Tomas Amaya.

1 Q. Why would you fax him what he just gave
 2 you?
 3 A. Didn't happen the same day.
 4 Q. Okay.
 5 A. I was probably putting the package
 6 together and thought he should try to keep
 7 everything assembled in one folder just so he could
 8 run a business.
 9 Q. Okay.
 10 A. That's what I would want.
 11 Q. All right.
 12 Well, it looks like the fax from JPV
 13 Services, which is you, and the fax from Tomas
 14 Amaya are both done on August 31st, is that
 15 correct?
 16 A. That's what it looks like.
 17 Q. Okay.
 18 Who faxed first?
 19 A. I don't know.
 20 Q. Well, can you read the times?
 21 A. I faxed first.
 22 Q. What time did you fax?
 23 A. 1748.
 24 Q. That's 5:48?

1 A. 5:48.
 2 Q. Okay.
 3 What time did Tomas Amaya fax?
 4 A. 3:42.
 5 Q. So who faxed first?
 6 A. Tomas Amaya.
 7 Q. Okay.
 8 Then you faxed second, correct?
 9 A. Yes.
 10 Q. Okay.
 11 And that first page is a copy of Carlos's
 12 refresher course, correct?
 13 A. Yes.
 14 Q. And the second page is what?
 15 A. His license.
 16 Q. And what time did Tomas Amaya fax that
 17 license?
 18 A. 3:43.
 19 Q. And what time did you fax it?
 20 A. 1748. This came in the same bunch.
 21 Page four, page five. You're missing page one, two
 22 and three.
 23 Q. And the third page, what time was that
 24 faxed?

1 A. It looks like August was penciled in here
 2 31, '07, 3:43.
 3 Q. Okay.
 4 So you're faxing out those first two
 5 documents at 1740, 1743, right?
 6 A. 1748.
 7 Q. 1748, whatever.
 8 And going back to Exhibit 7, you're
 9 sending a fax of the notification form at what
 10 time.
 11 A. 1748.
 12 Q. Okay.
 13 And also on --
 14 A. 1740. This was 1740. This was 1748. It
 15 sliced through the zero.
 16 Q. Okay.
 17 So you're sending some faxes out after
 18 5:00 o'clock.
 19 About 5:40 you're sending --
 20 A. I'm probably putting the whole thing
 21 together so he's got something to work with.
 22 Q. To whom?
 23 A. Well, it looks like to Tomas.
 24 Q. So Tomas is sending you at 3:00 in the

1 afternoon a copy of Carlos Bonilla's stuff?
 2 A. Right.
 3 Q. And then you're sending that back to him
 4 at 5:40-ish?
 5 A. Yeah.
 6 Q. Then you're holding in your hand the
 7 notification?
 8 A. Right.
 9 Q. And you're also sending that at 5:40 p.m.?
 10 A. Probably using this information to make
 11 that.
 12 Q. Okay.
 13 So you did make this form; is that
 14 correct, Exhibit 7?
 15 A. Well, it looks like you got it, Counselor.
 16 Q. And you put in your name as the
 17 representative for Safe Environment; isn't that
 18 correct?
 19 A. I put in my name as contact. I didn't
 20 know I can put contact -- I didn't know I had to
 21 put Tony's name. Again, it was nothing malicious
 22 about it. I just did it.
 23 Q. Okay.
 24 And the same goes true when you got upset

1 before and you said that you put your cell phone
 2 number for the Safe Environment contact also on
 3 August 31st at 6:30 p.m., correct?
 4 A. I don't know. I guess.
 5 Q. Okay.
 6 A. This was going to Molly. This was not
 7 going to Tomas. Tomas has my cell phone. Molly
 8 doesn't.
 9 I was putting this there for her to call
 10 because I was not getting the information and it
 11 even states in here -- you won't let me read it but
 12 you sure want to throw around stuff that's,
 13 obviously, not malicious but you want to throw it
 14 around but you don't want -- I'd been trying to get
 15 across to them that I need the asbestos abatement
 16 information that was done by the company they
 17 hired. They only gave me a portion of that. They
 18 gave me two pages.
 19 Q. So you -- on 8-31, you have faxes going to
 20 Molly and you have them going to the EPA and you
 21 have them going to Tomas Amaya and, in fact, those
 22 documents that are being faxed include your
 23 information for the very first time to Mike and
 24 Molly Collins that you will be using Safe

1 Environmental's license, correct? And that you
 2 have now filled out the notification form with your
 3 name listed as the contact person for Safe
 4 Environment also on August 31st, correct? Am I
 5 correct?
 6 A. Yes.
 7 MR. KRAMER: Objection.
 8 BY MR. THOMAS:
 9 Q. And you have Carlos Bonilla's information
 10 being forwarded to you on 8-31 by Tomas and then
 11 you're faxing that out to somebody at 5:40 p.m.,
 12 correct? And in all this, you are sending out
 13 faxes to various parties, some where you're
 14 indicating Safe Environment when it's Molly and
 15 Mike and when it's the government, you're leaving
 16 that off, right?
 17 MR. KRAMER: Objection.
 18 THE WITNESS: I'm still asking for the survey.
 19 BY MR. THOMAS:
 20 Q. So what was going on on August 31, 2007
 21 with this rush of critical information?
 22 MR. KRAMER: Objection.
 23 THE WITNESS: I finally got together enough
 24 information to put this package together and get it

1 out. But I still am sending Molly requests for all
2 of the paperwork involved in this project. And I'm
3 asking her to Fed Ex it to me if she has to. I'm
4 even offering I'm going down to Indianapolis on
5 Tuesday night, stay and look at the project all day
6 Wednesday. I even give them some tips on who to
7 use and who not to use if they decide to go with
8 another contractor.

9 BY MR. THOMAS:

10 Q. Well, you're talking to them about the
11 Indiana job which is really all you cared about,
12 right?

13 A. No. It's just one of the other jobs I
14 cared about. One of the other jobs I was -- to my
15 attention.

16 Q. Were you going to do that job for free as
17 well?

18 A. For free? No. I didn't even look -- do
19 takeoffs there. I didn't have time to -- I walked
20 through it. It -- I didn't even have time to walk
21 the whole job. It's a big building, several
22 buildings. I drove through one. No.

23 I -- again, I -- if I was so interested in
24 doing the job myself, I wouldn't have -- I wouldn't

1 have said don't use Champion or Heritage for your
2 own good. They both have a -- a major -- a history
3 of major violations. When I was an inspector, I
4 removed -- I was an inspector for Nicor.

5 Q. Will you do me a favor and look at the
6 very last facsimile dated August 31, 2007?

7 A. In this pile?

8 Q. Yes. Sorry. Not that one. The second to
9 last one in this pile which is Exhibit 14.

10 Do you see that?

11 A. Yes.

12 Q. That one's tough to read, right?

13 A. Yes. I don't know what happened there.

14 Q. Would you agree that Exhibit 15 is a
15 legible copy of that? Take a look and go ahead and
16 compare.

17 A. Yes. I don't know what all the other
18 stuff is, but it looks -- it's got the same
19 information.

20 Q. Do you see where you have indicated we
21 will now be using Safe Environment as the
22 contractor?

23 MR. KRAMER: Objection. You misread that.

24 THE WITNESS: I didn't say that. It says we

1 will be using Safe Environment Corporation of
2 Indiana contractor's license.

3 MR. THOMAS: You're going to be using their
4 license.

5 BY MR. THOMAS:

6 Q. Is that the first time you let Mike and
7 Molly know about that?

8 A. No.

9 Q. When was -- when did you do that before?

10 A. He asked me what the status was every time
11 I talked to him, what the status was with the
12 license. I said we're still waiting. We're still
13 waiting.

14 Q. Okay.

15 What made it official on August 31st?

16 A. When it didn't look like we was going to
17 get a license.

18 Q. And when it looked like that, what changed
19 that all of a sudden allowed you to have Safe
20 Environment's license?

21 A. Tony says we can use -- or Tomas says we
22 can use Tony's, period.

23 Q. Didn't he tell you in your first meeting
24 back in the summer that you would be using Safe

1 Environment's license?

2 A. He says if we have to, we could.

3 Q. When -- on August 31st when Tomas was
4 sending you a copy of Bonilla's stuff and Safe
5 Environment's stuff, did you ever ask him what the
6 status of his application was for Asbestek?

7 A. His -- his personal license?

8 Q. No. Asbestek's contractor abatement
9 license.

10 A. No. The only thing I could figure is he
11 either was denied or he never got it out.

12 Q. Did you ask him?

13 A. No.

14 Q. Did he tell you?

15 A. No.

16 MR. KRAMER: Can we take another minute?

17 THE VIDEOGRAPHER: We're off the record at
18 4:49 p.m.

19 (A short break was taken.)

20 THE VIDEOGRAPHER: We're back on the record at
21 5:02 p.m.

22 MR. THOMAS: We took a break in our deposition
23 and had some discussions and some things that were
24 presented to me. I'm not finished with my

Dictionary page 2 containing words from 'attended' to 'day' with their respective definitions and cross-references.

Dictionary page 3 containing words from 'falls' to 'conversations' with their respective definitions and cross-references.

McCorkle Court Reporters, Inc. Chicago, Illinois (312) 263-0052

McCorkle Court Reporters, Inc. Chicago, Illinois (312) 263-0052

Dictionary page 4 containing words from 'deals' to 'day' with their respective definitions and cross-references.

McCorkle Court Reporters, Inc. Chicago, Illinois (312) 263-0052

Dictionary page 5 containing words from 'deals' to 'day' with their respective definitions and cross-references.

McCorkle Court Reporters, Inc. Chicago, Illinois (312) 263-0052

Table with multiple columns of words and their corresponding numbers, including terms like 'abandon', 'abandonment', 'abandoner', etc.

McCorkle Court Reporters, Inc. Chicago, Illinois (312) 263-0052

Table with multiple columns of words and their corresponding numbers, including terms like 'abuse', 'abuse of power', 'abuse of trust', etc.

McCorkle Court Reporters, Inc. Chicago, Illinois (312) 263-0052

Table with multiple columns of words and their corresponding numbers, including terms like 'accident', 'accident-prone', 'accident-prone', etc.

McCorkle Court Reporters, Inc. Chicago, Illinois (312) 263-0052

Table with multiple columns of words and their corresponding numbers, including terms like 'accused', 'accused', 'accused', etc.

McCorkle Court Reporters, Inc. Chicago, Illinois (312) 263-0052

