

Exhibit A1

UNITED STATES BANKRUPTCY COURT
DISTRICT OF MASSACHUSETTS
EASTERN DIVISION

Chapter 11

Case No. 12-12292 (FJB)

In Re:

CHARLES STREET AFRICAN
METHODIST EPISCOPAL CHURCH
OF BOSTON,

Debtor.

DEPOSITION OF KEVIN L. COHEE, called
as a witness on behalf of the Debtor, before
Jeanette N. Maracas, Registered Professional
Reporter and Notary Public in and for the
Commonwealth of Massachusetts, at the Offices
of Ropes & Gray, LLP, Prudential Tower,
800 Boylston Street, Boston, Massachusetts,
on Friday, July 20, 2012, commencing at
9:39 a.m.

APPEARANCES:

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I N D E X

Testimony of: Direct Cross

Kevin L. Cohee

(by Ms. Joffre) 4

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P R O C E E D I N G S

(Exhibits 1 and 2 marked for
identification.)

KEVIN L. COHEE

A witness called for examination
by counsel for the Debtor, having been first
duly sworn, was examined and testified as
follows:

DIRECT EXAMINATION

BY MS. JOFFRE:

Q. Good morning, Mr. Cohee.

A. Good morning.

Q. My name is Giselle Joffre and, as you know,
I'm an attorney for the Charles Street
African Methodist Episcopal Church of Boston,
which I'll refer to today as Charles Street
AME Church. Have you been deposed before?

A. Yes.

Q. When?

A. You want to rephrase?

Q. When were you deposed?

A. You want to rephrase?

Q. No. I want you to answer the question.

A. You're not asking a question I can answer.

Q. Were you deposed in connection with a

1 lawsuit?

2 A. Yes.

3 Q. And when was that lawsuit filed? Was it
4 in the last ten years, Mr. Cohee?

5 A. Could you be more specific?

6 Q. No, I can't. Was the lawsuit filed within
7 the last ten years?

8 A. I'm going to need you to be more specific.

9 Q. You have a JD, isn't that correct, Mr. Cohee?

10 A. Yes.

11 Q. Do you have an understanding as to what
12 "filing a lawsuit" means?

13 A. Generally.

14 Q. Based on that understanding, was the lawsuit
15 filed in the last ten years?

16 A. You have to give me more detail.

17 Q. What was the nature of the lawsuit?

18 A. What lawsuit?

19 Q. I'll withdraw the question. Do you
20 understand that this is a deposition,
21 Mr. Cohee?

22 A. Yes.

23 Q. I'm going to ask you questions and you'll
24 answer. I'm going to ask you to keep your
25 voice up and answer verbally for the benefit

1 of the court reporter. Tell me if you don't
2 hear me or if you don't understand the
3 question. If you don't do so, I'm going to
4 assume that you both heard and understood.
5 If you need to take a break, let your counsel
6 know or let me know. We'll be flexible about
7 taking breaks today, but it is inappropriate
8 for you to take a break from the deposition
9 when a question is pending. Do you
10 understand that?

11 A. Yes.

12 Q. Please state your full name for the record.

13 A. Kevin Lafayette Cohee.

14 Q. What is your position at OneUnited Bank,
15 Mr. Cohee?

16 (Pause)

17 Q. Are you unsure as to your position at
18 OneUnited Bank, Mr. Cohee?

19 A. I have multiple positions.

20 Q. Thank you. Would you explain all of those
21 positions.

22 A. Sure. I'm the chairman of the board of
23 directors and I'm the chief executive
24 officer and I'm the head of the internal
25 asset review committee.

1 Q. Any further positions, Mr. Cohee?

2 A. I was thinking about that.

3 Q. Please take your time and think as to what
4 your positions are at the bank of which
5 you're the chairman and CEO. Take your time.

6 A. Okay. Thank you.

7 (Pause)

8 A. When you say "positions," do you mean
9 positions as in title positions?

10 Q. Do you not know what "positions" means,
11 Mr. Cohee?

12 MR. VESELY: I'm going to object
13 to arguing with the witness. He's asking
14 you a question. He doesn't understand
15 your question, what you mean by the term
16 "positions." He's asked you to define it.
17 So if you can't define it, then I object.
18 If you have an understanding as to what she
19 means by that, then you can answer the
20 question.

21 THE WITNESS: I don't know what
22 she means by "position."

23 Q. How long have you served in the position
24 of chairman and CEO?

25 (Pause)

1 Q. Mr. Cohee, do you need some additional
2 time to think about how long you served in
3 this position as chairman and CEO?

4 MR. VESELY: Counsel, Counsel, you
5 can't do that. You have a question pending.
6 You can't then follow it up with another
7 question. That's not the way this works.
8 You have to give him --

9 MS. JOFFRE: I'm simply asking if
10 he needs additional time.

11 MR. VESELY: Excuse me, Counsel,
12 don't interrupt me, okay? You asked him a
13 question. You have to give the witness a
14 chance to answer the question. You can't
15 ask multiple questions of the witness. You
16 have to give him a chance -- unless you're
17 going to withdraw the first question, give
18 him a chance to answer it, okay? And please
19 don't interrupt me.

20 MS. JOFFRE: It is clear what's
21 happening here, Mr. Vesely. I'm asking very
22 basic background questions to which he knows
23 the answer and he's deliberately wasting
24 time, and if I need to ask follow-up
25 questions, I will.

1 MR. VESELY: I've made my objection.

2 MS. JOFFRE: Your objection is
3 noted.

4 MR. VESELY: Excuse me. Your
5 characterization of what's happening at the
6 deposition is inappropriate. Just ask the
7 question.

8 MS. JOFFRE: It's accurate, it's
9 accurate.

10 A. I disagree with the characterization of --

11 MR. VESELY: She's going to ask
12 you questions and you answer the questions.
13 You don't have to render any opinions here.

14 A. Okay.

15 Q. The pending question is how long have you
16 served in the position of chairman and CEO
17 at OneUnited Bank?

18 (Pause)

19 A. I'm not sure.

20 Q. Charles Street AME Church entered into two
21 loan agreements with OneUnited Bank, isn't
22 that correct?

23 (Pause)

24 A. I don't know.

25 Q. Two days ago, Mr. Cohee, the president of

1 your bank testified that Charles Street
2 AME Church's total indebtedness constitutes
3 the largest delinquent loan at OneUnited
4 Bank, is that correct?

5 MR. VESELY: Are you asking him if
6 that's what she testified to or if --

7 MS. JOFFRE: I'm asking if her
8 testimony is, in fact, correct.

9 MR. VESELY: I object to the form
10 of the question. I don't understand -- I
11 don't understand what you mean by the
12 question. You're asking if her testimony
13 is correct?

14 MS. JOFFRE: I'm representing
15 that that's what she testified and I'm asking
16 if the statement is correct.

17 Q. Mr. Cohee, please answer the question.

18 MR. VESELY: I object that that was
19 her testimony, but you can -- if you are --
20 if she's asking, representing to you that
21 as a statement of fact, you can answer
22 whether or not that's correct.

23 THE WITNESS: I don't know what
24 her question is, okay? So is she asking me
25 do I know her testimony?

1 MR. VESELY: So you can ask her to
2 repeat the question.

3 A. Could you repeat the question, please?

4 Q. Two days ago the president of OneUnited Bank
5 testified that Charles Street AME Church's
6 total indebtedness constitutes the largest
7 delinquent loan at OneUnited Bank.

8 MR. VESELY: Objection to the form
9 of the question. That wasn't her testimony.

10 Q. Do you agree with that statement?

11 A. I mean, I really do want to be accurate
12 here and I'm not trying to give you a
13 hard time, but I don't understand your
14 question. You're asking me do I know what
15 the testimony is of the president of the
16 bank two days ago?

17 Q. Thank you. I accept that as your answer.
18 Mr. Cohee, what is the largest delinquent
19 loan at OneUnited Bank?

20 MR. VESELY: I object to the
21 question to the extent that you're asking
22 him to identify a particular borrower who
23 has the largest delinquent loan at the bank.
24 It infringes on the confidentiality of
25 customers at the bank as well as numerous

1 other applicable statutory prohibitions,
2 privileges for sharing information concerning
3 particular borrowers.

4 Q. Please answer the question if you're able
5 to reveal.

6 MR. VESELY: I instruct him not to
7 answer the question based on my objection.
8 If you want to rephrase the question, we can
9 revisit the question.

10 Q. If the answer to the question is Charles
11 Street AME Church, clearly there are no
12 privacy concerns at issue here. If you are
13 able to answer the question, Mr. Cohee,
14 please answer.

15 MR. VESELY: I would ask that you
16 rephrase the question, Counsel. If you can
17 do it in a way that --

18 MS. JOFFRE: Are you instructing
19 your client not to answer the question?

20 MR. VESELY: First of all, please
21 don't interrupt me. I'm asking you to
22 rephrase the question in a way that doesn't
23 infringe upon the objection that I just
24 asserted. I'm asking you to rephrase the
25 question. I will instruct him not to answer

1 the question in its current form.

2 Q. If you may answer, Mr. Cohee, without
3 infringing on anybody's privacy rights,
4 what is the largest delinquent loan at
5 OneUnited Bank?

6 MR. VESELY: I instruct you not
7 to answer the question. If you refuse to
8 rephrase the question, that's your
9 prerogative.

10 MS. JOFFRE: The record notes that
11 you instructed Mr. Cohee not to answer.

12 Q. I'm showing you, Mr. Cohee, what has been
13 marked as Exhibit 1. Please take a look at
14 Exhibit 1, Mr. Cohee.

15 A. (Witness examines document)

16 Q. Are you familiar with Exhibit 1?

17 A. (Witness examines document) Could you
18 rephrase the question, please?

19 Q. I'll repeat the question. Are you familiar
20 with Exhibit 1?

21 A. Could you rephrase the question, please?

22 Q. Have you seen Exhibit 1 before?

23 (Pause)

24 A. I mean, I think, obviously, I haven't seen
25 this thing before you just handed it to me.

1 That being said, just to cooperate, I may
2 have seen a copy of this document.

3 MR. VESELY: Giselle, can we have
4 five minutes, please?

5 Q. Is that your answer to the question, Mr.
6 Cohee?

7 MS. JOFFRE: I'm not taking a break
8 with a question pending.

9 Q. Is that your final answer to the question?

10 A. Yes.

11 MS. JOFFRE: Yes.

12 (Break taken)

13 MS. JOFFRE: We're back on the
14 record. Thank you.

15 BY MS. JOFFRE:

16 Q. Mr. Cohee, I ask you to look again at
17 Exhibit 1. Is this document, does it have
18 a heading that says Fixed Rate Promissory
19 Note?

20 A. Yes.

21 Q. And does the document reflect an amount
22 for the promissory note of \$1.115 million?

23 A. The document has \$1.115 million at the top.

24 Q. Thank you. Does it also have at the top
25 the date of October 3rd, 2006?

1 A. Yes.

2 Q. Does it appear to be a promissory note
3 for money loaned to Charles Street AME
4 Church?

5 A. I haven't read the details of this note
6 so I'm not in a position to characterize
7 what it is or is not.

8 Q. I ask you to turn to the second page of
9 the promissory note. If you read at the
10 top Bullets 1, 2 and 3, the document reads,
11 "this note is secured by inter alia," and
12 then it lists different forms of collateral,
13 is that correct?

14 A. (Witness examines document) I'm not a
15 lawyer so I'm not going to interpret this
16 legal document.

17 Q. Mr. Cohee, would you please read Bullet
18 Point 1 aloud.

19 A. Okay. "A valid first mortgage, security
20 agreement and assignment of even date from
21 Charles Street African Methodist Episcopal
22 Church of Boston, on property located at
23 551 Warren Street, 553-565 Warren Street,
24 Roxbury, Suffolk County, Massachusetts and
25 70 Sumner Street, Milton, Norfolk County,

1 Massachusetts," in parens "(the property)"
2 semicolon.

3 Q. And "property" is also in quotations, is
4 that correct?

5 A. Yes, "property" is in quotations.

6 Q. Thank you. Do you know whether the
7 properties here defined as the property
8 constitute the collateral put up by Charles
9 Street AME Church for \$1.15 million loaned
10 by OneUnited Bank to the church?

11 A. Once again, I'm not a lawyer and, therefore,
12 I'm not in a position to interpret this
13 legal document.

14 Q. You may not be a lawyer, but you did earn a
15 juris doctorate degree, did you not, Mr.
16 Cohee?

17 A. Yes, that's correct.

18 Q. You are the chairman and CEO of OneUnited
19 Bank, is that correct, Mr. Cohee?

20 A. Yes.

21 Q. Does the property located at 551 Warren
22 Street in Roxbury, Massachusetts serve as
23 collateral for \$1.115 million loaned by
24 OneUnited Bank to Charles Street AME Church?

25 A. With all due respect, I'm the CEO of the

1 company. I have lawyers, I have loan
2 departments. I don't know. This is not
3 my job. I don't know.

4 Q. So just to clarify, it is your testimony
5 that as you sit here today, you do not know
6 if 551 Warren Street in Roxbury,
7 Massachusetts serves as collateral for a
8 \$1.115 million loan made by OneUnited Bank
9 to Charles Street AME Church?

10 MR. EDELMAN: Objection to the form
11 of the question.

12 A. Can you repeat the question?

13 MS. JOFFRE: Please read the
14 question, Ms. Maracas.

15 (Question read)

16 MR. EDELMAN: Same objection.

17 A. No, that was not my testimony.

18 Q. Does 551 Warren Street Roxbury, Massachusetts
19 serve as collateral for a \$1.115 million
20 loan made by OneUnited Bank to Charles Street
21 AME Church?

22 A. Yes.

23 Q. On October 3rd of 2006, did OneUnited believe
24 that the African Methodist Episcopal Church,
25 Incorporated had a beneficial interest in

1 551 Warren Street?

2 A. Can you repeat the question?

3 Q. On October 3rd, 2006, did OneUnited believe
4 that the African Methodist Episcopal Church,
5 Incorporated had a beneficial interest in
6 551 Warren Street?

7 A. I'm sorry. Could you repeat the question
8 again?

9 MS. JOFFRE: Ms. Maracas, please
10 repeat the question.

11 (Question read)

12 A. I don't know what you mean by the term
13 "beneficial."

14 Q. Thank you. Mr. Cohee, what did you do to
15 prepare for this deposition?

16 A. I talked to my lawyers.

17 Q. And you're here represented by attorneys
18 from Pierce Atwood, is that correct?

19 A. Yes.

20 Q. And did you meet with them to prepare for
21 this deposition?

22 A. Yes.

23 Q. On how many occasions?

24 A. I'm not certain, but I met with them twice.

25 Q. Just approximately how long did each

1 preparation session last?

2 A. The first one, maybe 45 minutes. The second
3 one, maybe 20 or 30 minutes.

4 Q. Other than your attorneys from Pierce Atwood,
5 who else attended the first preparation
6 session?

7 A. My attorneys from OneUnited Bank.

8 Q. Anyone else?

9 A. No.

10 Q. Did anyone else other than your attorneys
11 from Pierce Atwood or Mr. Cooper attend
12 the second preparation session?

13 A. No.

14 Q. Did you review any documents in the course
15 of those sessions?

16 A. I'm sorry. Could you repeat the question?

17 Q. Did you review any documents in the course
18 of those sessions?

19 A. In the first one, yes. In the second one,
20 no.

21 Q. What documents did you review in that first
22 session?

23 A. I don't remember.

24 Q. When did that first session take place?

25 A. Two days ago.

1 Q. Did you talk to anyone other than your
2 attorneys in preparation for this deposition?

3 A. No.

4 Q. Who introduced the idea of OneUnited lending
5 money to Charles Street AME Church? The
6 bank or the church?

7 A. I don't know.

8 Q. Do you know someone named Reginald Nunnally,
9 N U N N A L L Y?

10 A. Yes.

11 Q. Have you had conversations with Mr. Nunnally
12 concerning the Roxbury Renaissance Center
13 construction project?

14 A. I don't think so.

15 Q. When did you first learn of the Roxbury
16 Renaissance Center construction project?

17 A. I don't remember the exact date.

18 Q. Do you recall an approximate date?

19 A. No.

20 Q. Do you recall a year?

21 A. No.

22 Q. You know Reverend Groover, the pastor of
23 Charles Street AME Church, don't you,
24 Mr. Cohee?

25 A. No, I don't know him. I know of him.

1 Q. Isn't it true that you met with Reverend
2 Groover in person?

3 A. I met with Reverend Groover in passing. I
4 never had a meeting with Reverend Groover.

5 Q. Just to clarify, it's your testimony as you
6 sit here today that you've never had an
7 in-person meeting with Reverend Groover?

8 MR. VESELY: Objection to the form
9 of the question.

10 A. Yes, that's my testimony.

11 Q. Have you ever participated in any telephone
12 calls with Reverend Groover?

13 A. If I did, it was in passing and there would
14 have been other people on the call, and it
15 would have been so inconsequential, I don't
16 remember it.

17 Q. What role, if any, did you play, Mr. Cohee,
18 in the underwriting of the loans made by
19 OneUnited Bank to Charles Street AME Church?

20 MR. EDELMAN: I didn't hear the
21 question.

22 Q. What role, if any, did you play, Mr. Cohee,
23 in the underwriting of loans made by
24 OneUnited to Charles Street AME Church?

25 A. I approved the loan because of its size.

1 Q. And what was the size of that loan?

2 A. It is approximately \$5 million.

3 Q. It's your testimony that you approved it
4 because of that size?

5 A. No, that's not my testimony.

6 MS. JOFFRE: Ms. Maracas, would
7 you please read the witness' answer to
8 the question, "what was your role in the
9 underwriting process"?

10 (Record read)

11 A. Well, let me clarify.

12 MR. VESELY: There's no question
13 pending before you. Just wait until she
14 poses a question.

15 Q. OneUnited required that Charles Street AME
16 Church deposit \$850,000 into the bank as a
17 condition of the loans, isn't that right?

18 A. Could you repeat the question?

19 Q. OneUnited required that Charles Street AME
20 Church deposit \$850,000 into the bank as a
21 condition of the loans, isn't that right?

22 A. I'm not familiar with the loan at that
23 level of detail.

24 Q. Mr. Cohee, is OneUnited Bank under the
25 supervision of the Federal Deposit Insurance

1 Corporation?

2 A. Could you rephrase?

3 Q. I'll repeat the question. Is OneUnited Bank
4 under the supervision of the Federal Deposit
5 Insurance Corporation?

6 A. I don't understand your question.

7 Q. Thank you, Mr. Cohee.

8 MS. JOFFRE: Ms. Maracas, would you
9 please mark Exhibit 3.

10 (Exhibit 3 marked for
11 identification.)

12 MS. JOFFRE: For the record, we
13 marked Exhibit 2, but as yet not used it.
14 So this is Exhibit 3.

15 Q. Please take a look at Exhibit 3, Mr. Cohee.

16 A. (Witness examines document) I've looked
17 at it.

18 Q. Are you familiar with this document?

19 A. Generally.

20 Q. The document shows a privilege log, is that
21 true?

22 A. It certainly says, "OneUnited Bank's
23 Privilege Log."

24 Q. And it lists five different reports of
25 examination authored by the FDIC, for four

1 of the reports, the Massachusetts Division
2 of Banks and the FDIC, isn't that correct?

3 A. Would you repeat the question, please?

4 Q. Certainly. The log lists five different
5 reports of examination authored by the FDIC,
6 in the case of four of them by the
7 Massachusetts Division of Banks and the
8 FDIC?

9 A. The document has the title Author and then
10 under it it says FDIC, it says Massachusetts
11 Division of Banks/FDIC, indicates four
12 others.

13 Q. Have you seen this document before today?

14 A. Yes.

15 Q. And this is, in fact, a document that was
16 provided by OneUnited's attorneys to the
17 Charles Street AME Church, is that correct?

18 A. I don't know.

19 Q. Do you, as chairman and CEO of OneUnited
20 Bank, communicate directly with regulators
21 from the FDIC and Massachusetts Division
22 of Banks?

23 A. From time to time.

24 Q. Have any of these communications been in
25 writing?

1 A. Could you rephrase or repeat, repeat the
2 question, please.

3 Q. Sure. Have any of these communications
4 been in writing?

5 A. Yes.

6 MS. JOFFRE: I'm going to ask
7 Ms. Maracas to mark Exhibit 4.

8 (Exhibit 4 marked for
9 identification.)

10 Q. Before you take a look at Exhibit 4, Mr.
11 Cohee, still focusing on Exhibit 3, did
12 you assist in the preparation of this
13 privilege log?

14 A. No.

15 Q. Please take a look at Exhibit 4.

16 A. Do you want me to read this, or what do
17 you want me to do?

18 Q. Just take a look at it for purposes of
19 seeing if you're familiar with the document,
20 and I'll direct you to some specific
21 portions.

22 A. (Witness examines document) Okay.

23 Q. Have you had a chance to take a look?

24 A. I'm sorry?

25 Q. Have you had a chance to take a look?

1 A. Yes.

2 Q. I'm going to direct you to the third page,
3 has the heading Document Requests. Please
4 read Request 1 to yourself and let me know
5 when you've had a chance to read it.

6 A. You said please read No. 1?

7 Q. Yes, and let me know when you've had a
8 chance to read it.

9 A. (Witness examines document) I have read it.

10 Q. Thank you. Has any of your written
11 correspondence with the regulators involved
12 topics raised in Request No. 1?

13 A. No.

14 Q. Would you please read Request No. 2.

15 A. "Any documents" --

16 Q. Sorry, to yourself, and let me know when
17 you're done.

18 A. (Witness examines document) Okay. I
19 finished reading it.

20 Q. Thank you. Has any of your written
21 communications or have any of your written
22 communications with regulators involved
23 topics raised in No. 2?

24 A. No.

25 Q. Please turn the page, Mr. Cohee, and read

1 to yourself document Request No. 5.

2 A. (Witness examines document) I finished
3 reading it.

4 Q. Thank you. Have any of your written
5 communications to regulators concerned the
6 guarantee as described in document Request
7 No. 5?

8 A. No.

9 Q. Thank you.

10 MS. JOFFRE: I'd like to take a
11 five-minute break, if that's okay.

12 MR. EDELMAN: Sure.

13 (Break taken)

14 MS. JOFFRE: We're back on the
15 record.

16 BY MS. JOFFRE:

17 Q. Mr. Cohee, where do you live?

18 A. Could you rephrase that, please?

19 Q. Where do you reside?

20 A. I live part of the time in Boston, part
21 of the time in Los Angeles and part of the
22 time in Miami.

23 Q. Would you please provide your home addresses
24 in each location.

25 (Pause)

1 MR. VESELY: You can tell her
2 your legal residence, what is your legal
3 residence. You can give her your legal
4 residence.

5 Q. When there's a question pending, it's
6 inappropriate to consult with your attorney.

7 MR. VESELY: Hold on one moment.
8 He hasn't consulted with me. I just
9 indicated for the record that he can testify
10 as to his legal residence.

11 MR. EDELMAN: Let counsel please
12 step out for a moment.

13 MR. VESELY: The witness will
14 remain.

15 MS. JOFFRE: We're taking a break?
16 I object.

17 MR. VESELY: Yes. The witness will
18 remain.

19 MR. EDELMAN: Without the witness.

20 MS. JOFFRE: Even so.

21 MR. EDELMAN: Okay.

22 MS. JOFFRE: It's a very
23 straightforward question.

24 (Break taken)

25 MR. EDELMAN: Go ahead.

1 BY MS. JOFFRE:

2 Q. There's a question pending.

3 A. Could you repeat the question, please?

4 Q. Please provide your home addresses in each
5 location.

6 MR. VESELY: Objection to the form
7 of the question.

8 A. I don't feel comfortable providing my home
9 addresses in a public forum.

10 Q. Are you married, Mr. Cohee?

11 A. Yes.

12 Q. To whom?

13 A. Teri Williams.

14 Q. What percentage of OneUnited Bank stock do
15 you own?

16 MR. VESELY: Objection. While I
17 reserve relevancy objections for the time
18 of trial, Giselle, it's a limited number of
19 issues that are before the Bankruptcy Court
20 and the amount of stock that this particular
21 individual owns in the bank, I think, is
22 really far outside any possible relevance.
23 But you can answer the question if -- you
24 can answer the question, but I want to put
25 that statement on the record.

1 A. I don't know off the top of my head, but
2 I'm the majority shareholder.

3 Q. What percentage of OneUnited Bank stock
4 does Ms. Williams, your wife, own?

5 MR. VESELY: Objection, instruct
6 him not to answer that question.

7 Q. Are there any estate planning trusts set
8 by you?

9 MR. VESELY: I'm sorry. Can you
10 repeat the question, please?

11 Q. Are there any estate planning trusts in
12 connection with OneUnited Bank set by you?

13 MR. VESELY: I've got to object
14 to the question. I don't understand the
15 question.

16 Q. If you understand, Mr. Cohee.

17 A. Could you repeat the question, please?

18 MS. JOFFRE: Please read the
19 question.

20 (Question read)

21 MR. VESELY: I object. I don't
22 understand the question. Are you asking
23 does Mr. Cohee personally have an estate
24 plan involving trusts? You're asking about
25 his estate plan, his personal estate plan?

1 MS. JOFFRE: If Mr. Cohee
2 understands.

3 MR. VESELY: Right, I'm trying to
4 get clarification. Let the record reflect
5 counsel won't clarify her question.

6 A. I can ask you a series of questions, I'm
7 not trying to be elusive, but I really
8 don't understand the question.

9 Q. If you don't understand, that's fine.

10 A. Okay.

11 Q. To clarify, Mr. Cohee, is it your testimony
12 as you sit here today, that you are the
13 majority stockholder of OneUnited Bank,
14 but you do not know the exact percentage
15 of OneUnited Bank stock that you own?

16 MR. VESELY: Objection to the form
17 of the question.

18 A. Suffice it to say, I own a lot of shares
19 of OneUnited Bank.

20 Q. Do you know the exact percentage of stock
21 that you own in OneUnited Bank as you sit
22 here today?

23 A. No.

24 Q. I show you what's been marked as Exhibit 2,
25 kind of out of order. Please take a look at

1 Exhibit 2 and let me know when you've had
2 a chance to review it generally.

3 A. (Witness examines document) Okay. I
4 generally looked at it.

5 Q. Have you seen this document before?

6 A. Probably in passing.

7 Q. And what is it?

8 A. A non-revolving line of credit promissory
9 note with expiration date.

10 Q. What is the maximum principal amount
11 reflected on the promissory note?

12 A. \$3,652,000.

13 Q. It's dated October 3rd, 2006, is that
14 correct?

15 A. Yes, it is.

16 Q. The borrower is Charles Street AME Church
17 and the bank, OneUnited Bank. Are those
18 statements correct?

19 A. That's what's on this document.

20 Q. What, if any, was your involvement in the
21 underwriting of the loan associated with
22 this promissory note?

23 A. Once again, I don't underwrite loans. If
24 loans are of a certain size, then they will
25 come to me for approval, final approval.

1 Q. Prior to October 3rd of 2006, did you have
2 any direct communications with anyone at
3 Charles Street AME Church concerning the
4 loan of approximately \$3.6 million?

5 A. I'm sorry, I got distracted. I apologize.
6 Could you repeat that again?

7 MS. JOFFRE: I'll ask Ms. Maracas
8 to repeat it.

9 THE WITNESS: Miss, could you please
10 repeat it?

11 (Question read)

12 A. Not to my knowledge.

13 Q. Mr. Cohee, who is Arman Walker?

14 A. He is the former chief lending officer for
15 OneUnited Bank. He's one of the former
16 chief lending officers for OneUnited Bank.

17 Q. Does he hold a current position at OneUnited
18 Bank?

19 A. No.

20 Q. During his time at OneUnited Bank, did you
21 correspond with Mr. Walker about either
22 of the loans made to Charles Street AME
23 Church?

24 MR. EDELMAN: I didn't get it.

25 Q. Did you correspond with Mr. Walker about

1 either of the loans made to Charles Street
2 AME Church?

3 MR. EDELMAN: Is there a time?

4 MS. JOFFRE: During his time at
5 OneUnited Bank.

6 MR. EDELMAN: Thank you.

7 A. When you say "correspond," what do you mean?
8 Do you mean did he write letters back and
9 forth, did he chat it up?

10 Q. Any type of communication, whether verbal
11 or written.

12 MR. VESELY: I object to the form
13 of the question. That's a different question
14 than what was posed to you originally.

15 THE WITNESS: Okay, guys, why don't
16 we finalize the question, whoever will be
17 appropriate to come up with the question,
18 and I'd be more than willing to answer.

19 Q. I'm happy to rephrase. Did you have any
20 conversations with Arman Walker during his
21 time at OneUnited Bank concerning either of
22 the loans made to Charles Street AME Church?

23 A. Yes, I would imagine so.

24 Q. And what was the nature of those
25 conversations?

1 A. I have no recall, but generally we talked
2 about all of the loans at the bank.

3 Q. Who is Amanda Feng, F E N G?

4 A. She is a person who works in our loan
5 servicing department.

6 Q. Do you know what her position was for the
7 period from 2006 to 2010?

8 A. No.

9 Q. Who is Michael Miller?

10 A. He is a person that worked for OneUnited
11 Bank.

12 Q. Do you know what his position was when he
13 did work for OneUnited Bank?

14 A. No.

15 Q. Do you know whether he had any involvement
16 with the loans made to Charles Street AME
17 Church?

18 A. I believe so.

19 Q. What do you believe that involvement was?

20 A. I would be guessing. I don't know.

21 Q. Who is Tom Jones?

22 A. He is a person who works for OneUnited Bank,
23 or worked for OneUnited Bank.

24 Q. What is his current position at OneUnited?

25 A. I don't know.

1 Q. Do you know what his position was during
2 the period from 2006 to 2010?

3 A. No.

4 Q. Did he have any involvement with the loans
5 made to Charles Street AME Church?

6 A. I believe he was the underwriter, but don't
7 hold me to that. Once again, you're asking
8 me really detailed questions, so I'm
9 guessing.

10 MR. VESELY: No.

11 A. Strike it. I don't know, I don't know.

12 MR. VESELY: She doesn't want you
13 to guess.

14 A. Okay, then I won't guess, then.

15 MR. VESELY: No guess, no
16 speculation.

17 A. Okay.

18 Q. It's only what you know, Mr. Cohee. You
19 testified earlier that you may have
20 participated in telephone calls in which
21 Reverend Groover also participated. Did
22 any of these telephone calls take place
23 after December 1st, 2009?

24 A. I don't know Groover, I haven't had any
25 conversations with Groover, any meetings

1 with Groover, any contact I had with him
2 would have been purely incidental. And
3 the only reason I'm saying not at all is
4 because he may have been on a call or
5 something that I was on.

6 Q. Did you participate in any telephone
7 conversations with representatives of
8 Charles Street AME Church concerning the
9 loans after December 1st, 2009?

10 A. Can you repeat the question?

11 MS. JOFFRE: I'd ask Ms. Maracas
12 to please repeat it.

13 (Question read)

14 A. Probably, but I don't really recall the
15 specific details of those calls.

16 MS. JOFFRE: Ms. Maracas, would you
17 please mark Exhibit 5.

18 (Exhibit 5 marked for
19 identification.)

20 MR. VESELY: Can I just ask,
21 Giselle, when you're saying "representative"
22 you don't mean attorneys, is that correct?

23 MR. EDELMAN: Of the church.

24 MR. VESELY: Attorneys of the
25 church.

1 MS. JOFFRE: Any representative,
2 any representative.

3 MR. VESELY: So that's inclusive
4 of the attorneys?

5 MS. JOFFRE: Inclusive of attorneys,
6 yes.

7 Q. I'll clarify that for you, Mr. Cohee.
8 Inclusive of attorneys for the church.

9 A. I would say yes, there's probably been some
10 conversations since 2009 that I was involved
11 in.

12 Q. Do you remember the nature of those
13 conversations?

14 A. No.

15 Q. Let's take a moment to look at Exhibit 5
16 and let me know when you've had a chance to
17 review it.

18 A. (Witness examines document)

19 MR. VESELY: Is there a second page
20 to this?

21 MR. EDELMAN: Is that a one-page
22 document?

23 MR. VESELY: Looks like it's a
24 multi-page document.

25 MS. JOFFRE: Apologies. If we can

1 take five minutes, we'll have the complete
2 document. Apologies for that.

3 (Break taken)

4 MS. JOFFRE: Can we go back on the
5 record?

6 BY MS. JOFFRE:

7 Q. Mr. Cohee, you now have a complete copy of
8 Exhibit 5.

9 A. Okay.

10 Q. It's two pages. Would you please take a
11 look at that and let me know when you've had
12 a chance to review it.

13 A. (Witness examines document) Okay, I have
14 looked at it.

15 Q. Thank you. This document is a letter from
16 Yan Feng of OneUnited Bank to Reverend
17 Gregory Groover, is that correct, and it's
18 dated April 22nd, 2010?

19 A. Yes, it is.

20 Q. And the document reads that, she writes,
21 Ms. Feng writes, "this letter serves as a
22 memorandum to the teleconference meeting
23 you had with our bank CEO, Mr. Kevin Cohee,
24 on April 20, 2010," is that correct?

25 A. Yes, it does.

1 Q. The next sentence reflects that the, what's
2 termed here the construction loan expired
3 on December 1st of 2009. Is that what it
4 reads?

5 A. Well, what it says is, "it has been mutually
6 acknowledged that the construction loan
7 expired on 12/1/2009 and that it is all due
8 and payable."

9 Q. And outside of what you see in this document,
10 are you aware that Loan No. 1002423430
11 expired on December 1st, 2009? I'm just
12 referencing the loan number in that sentence.

13 A. Oh, okay. Yes.

14 Q. And do you recall participating in
15 conversations with Charles Street AME Church
16 regarding the prospect of OneUnited granting
17 a third and new loan?

18 A. Now that you showed me the document, yes.

19 Q. So the document refreshes your recollection
20 as to that?

21 A. Yes, the document refreshes my recollection.

22 Q. As a term of the proposed new loan, OneUnited
23 was requiring that Charles Street AME Church
24 maintain a cash deposit in the bank, isn't
25 that so?

1 A. One second, please. (Witness examines
2 document)

3 MR. VESELY: Objection to the form
4 of the question.

5 A. I'm sorry. Could you repeat the question,
6 please?

7 Q. Sure. Isn't it true that in connection
8 with the new loan, one of the proposed
9 conditions was that the church maintain a
10 cash deposit in the bank?

11 MR. VESELY: Same objection.

12 A. Yes, it appears to be true.

13 Q. Is that what's reflected in this letter?

14 A. Yes.

15 Q. Independent of this letter, do you have a
16 recollection of OneUnited Bank proposing
17 that condition?

18 A. Yes.

19 Q. And what was the purpose of the \$1 million
20 cash deposit, as you remember it?

21 A. To serve as additional collateral to the
22 new loan.

23 Q. As the CEO at the time, why did OneUnited
24 request a \$1 million cash deposit as opposed
25 to asking the church to pay down the

1 construction loan?

2 A. Could you repeat the question, please?

3 Q. Yes. As CEO of OneUnited Bank, why was
4 OneUnited requesting a \$1 million cash
5 deposit in connection with a new loan as
6 opposed to asking the church to pay down
7 the construction loan?

8 A. A \$1 million deposit would be easier to
9 come up with than a \$1 million paydown. It
10 was to be helpful.

11 Q. Can you describe how it would be easier
12 to come up with a \$1 million deposit as
13 opposed to putting the same \$1 million in
14 cash toward paying down the construction
15 loan, Mr. Cohee?

16 A. A deposit from an entity that had millions
17 and millions of dollars, in my opinion,
18 would be easier to come up with. You can
19 just simply move a deposit from one
20 institution to another institution.

21 Q. As CEO and chairman, do you know of any
22 other time that the bank has asked the
23 defaulted borrower for new deposits?

24 A. Yes. It --

25 MR. VESELY: That's the answer.

1 A. Yes.

2 MR. VESELY: Don't give her any
3 information about other borrowers.

4 Q. When a borrower is in default, is it the
5 bank's practice to ask for new deposits?

6 MR. VESELY: Objection to the form
7 of the question.

8 A. Could you rephrase, please?

9 Q. Does the bank have a policy of requesting
10 new deposits when a borrower is in default?

11 A. No.

12 Q. So we've established that what's termed
13 in this letter as the construction loan
14 expired on December 1st, 2009. Do you
15 agree?

16 MR. VESELY: Objection to the form
17 of the question.

18 A. Could you repeat the question, please?

19 Q. In fact, I'll withdraw and rephrase.

20 A. Okay.

21 Q. OneUnited's loan to Charles Street AME
22 Church of approximately \$3.6 million expired
23 on December 1st, 2009, is that correct?

24 A. That's certainly what this document says.

25 Q. And you also --

1 MR. VESELY: Let the record reflect
2 the witness was referring to Exhibit No. 5.

3 MS. JOFFRE: Thank you.

4 Q. Do you have an independent recollection
5 that that was the date on which that loan
6 expired?

7 A. No.

8 Q. What remedies did the bank seek against
9 Charles Street AME Church between
10 December 2009 and July 2010 with respect
11 to the loan for approximately \$3.6 million?

12 A. I don't know.

13 Q. Did OneUnited Bank seek to foreclose on
14 that loan between December 2009 and
15 July 2010?

16 A. What loan are you referring to?

17 Q. The loan made by OneUnited Bank to Charles
18 Street Church in the amount of approximately
19 \$3.6 million.

20 A. I'm sorry. What's your question again?

21 Q. Did OneUnited Bank foreclose on that loan
22 during the period December 2009 and
23 July 2010?

24 MR. VESELY: Objection to the
25 form of the question. Foreclose on the loan?

1 A. I don't know.

2 Q. Did OneUnited file a lawsuit in connection
3 with the default of that loan?

4 A. Are you making a distinction between the
5 two loans, or what? Help me out.

6 Q. In fact, I am. So for your ease of
7 reference, Mr. Cohee, can we agree to call
8 the loan made by OneUnited to Charles Street
9 AME Church in the amount of approximately
10 \$3.6 million the construction loan? If I
11 refer to the construction loan, will you
12 understand that's what I'm referring to?

13 A. Okay.

14 Q. Okay. So with regard to the construction
15 loan, did OneUnited file a lawsuit in
16 connection with the default of that loan
17 between December 2009 and July 2010?

18 A. I don't know.

19 Q. With regard again to the construction loan,
20 did OneUnited notice a cost default on the
21 church loan at any time?

22 MR. VESELY: Objection to the form
23 of the question.

24 A. The loans have cross-defaulted at all place
25 and time.

1 Q. Just for clarity of the record, when we
2 refer to the church loan, we're referring
3 to the loan made by OneUnited Bank to
4 Charles Street AME Church in the amount
5 of approximately \$1.115 million.

6 A. Okay.

7 Q. Just because I hadn't defined that on the
8 record. The question is did OneUnited
9 give notice of a cost default on the church
10 loan at any time?

11 MR. VESELY: Objection to the form
12 of the question.

13 A. Once again, I'm not in the loan department,
14 I'm not a lawyer. I'm CEO. I don't know.

15 Q. OneUnited Bank raised the threat of
16 litigation against Charles Street AME Church
17 in connection with the construction loan
18 in August of 2010, isn't that correct?

19 MR. VESELY: Objection to the form
20 of the question.

21 A. I'm sorry. Can one of you please read it
22 back? I got like a puzzle. Can I have a
23 piece of paper, please?

24 MR. VESELY: You want a pen?

25 THE WITNESS: Yeah, thank you very

1 much.

2 MS. JOFFRE: Okay. Ms. Maracas,
3 would you please repeat the question for
4 Mr. Cohee?

5 (Question read)

6 MR. VESELY: Same objection.

7 A. I don't know.

8 MR. VESELY: Can we take a
9 two-minute break, please?

10 MS. JOFFRE: Sure, yes, sure.

11 (Break taken)

12 MS. JOFFRE: Back on the record.
13 Ms. Maracas, I'm going to ask you to mark
14 Exhibit 6 and pass it to Mr. Cohee.

15 (Exhibit 6 marked for
16 identification.)

17 Q. Let me know when you've had a chance to
18 look at Exhibit 6.

19 A. (Witness examines document)

20 Q. Have you had a chance to take a look at
21 Exhibit 6?

22 A. Yes, I did.

23 Q. Thank you. Exhibit 6 is a copy of an e-mail
24 from Amanda Yan Feng at OneUnited to Reverend
25 Gregory Groover with an attached letter, is

1 that right?

2 A. Yes.

3 Q. And the date and the time of the e-mail is
4 reflected as Friday, August 6, 2010 at
5 5:37 p.m., is that correct?

6 A. Yes.

7 Q. And in the e-mail Ms. Feng writes, "enclosed
8 please find a response letter related to
9 today's conference call. The original letter
10 was mailed to you today. In addition, a
11 faxed copy was also sent to your attention."
12 Is that correct?

13 A. Yes, that's what this letter says.

14 Q. And you're copied on the e-mail, Mr. Cohee?

15 A. Yes, I am.

16 Q. Do you recall the conference call that Ms.
17 Feng refers to in this e-mail when she says
18 "today's conference call"?

19 A. Yes.

20 Q. Who participated in that conference call?

21 A. Bob Cooper, Cecilia Isaac, Amanda Feng, some
22 people from Bain Capital, and there may have
23 been other participants, Groover, I believe.
24 I wasn't on the call.

25 Q. And the second page of the exhibit is the

1 response letter sent by Ms. Feng to Reverend
2 Groover, is that correct?

3 A. Yes.

4 Q. Have you seen this letter before?

5 A. No, I don't think so.

6 Q. Did you participate in the preparation of
7 this letter?

8 A. I certainly concur with the contents of
9 this letter. I didn't help create this
10 specific letter, but I do recall this
11 incident and I agree with the sentiment
12 expressed therein.

13 Q. And you'll note at the top right corner of
14 the letter it reflects that the letter at
15 least was intended to be sent by Priority
16 Mail, by e-mail and by fax, is that correct?

17 A. Yes, by Priority Mail, by e-mail and by fax.

18 Q. Do you know whether there was an urgency
19 in sending the letter?

20 A. Yes, yes, I remember this.

21 Q. And why was there an urgency?

22 A. Because the people at Bain Capital and
23 Groover had called and threatened officers
24 of my bank and we were highly upset with
25 their actions.

1 Q. And you mentioned threatened. What form
2 did the threats take?

3 A. That if you don't take less than the full
4 amount of the money, we will destroy this
5 bank through public relations.

6 Q. Who conveyed that information to you since
7 you did not participate on the call?

8 A. Bob Cooper and Cecilia Isaac.

9 Q. Was an offer made by the church or on
10 behalf of the church on that telephone call,
11 to your knowledge?

12 A. If you want to call threatening somebody
13 unless they do something that you want them
14 to do an offer, I suppose so.

15 Q. And what was it that they wanted OneUnited
16 Bank to do, if you have knowledge?

17 A. To take some amount of money that I
18 believe was in the area of \$1 million, or
19 thereabouts. It was certainly -- I don't
20 remember if it was that number, but it was
21 20 or 30 cents on the dollar. I think it
22 was about -- I don't remember the exact
23 number, but it was about \$1 million, or
24 thereabouts, for a \$5 million loan, but I
25 don't remember the exact details of what

1 the offer was other than it was a huge
2 discount.

3 Q. And what about the nature of the offer to
4 purchase the loan triggered a lawsuit or
5 the threat of a lawsuit?

6 MR. VESELY: Objection to the form
7 of the question.

8 A. The threat to destroy the reputation of
9 the bank, a federally insured financial
10 institution, unless we capitulated to their
11 demand.

12 Q. And when Mr. Cooper and/or Ms. Isaac relayed
13 this threat to you, did they tell you who
14 specifically on the call made the threat?

15 A. They told me some guy who said he was the
16 head of Bain's restructuring group, I don't
17 recall his name at this point, issued the
18 ultimatum. I remember vividly because I
19 was very upset about it then and I'm very
20 upset about it now, and I don't like people
21 threatening my people.

22 Q. Had OneUnited ever received an offer to buy
23 any loan below par?

24 MR. VESELY: Ever over the course
25 of the history of the bank?

1 A. At any time?

2 Q. Yes, ever over the history of the course
3 of the bank, obviously limited to your
4 knowledge.

5 A. Repeat the question, please?

6 Q. Sure, I will do so. Has OneUnited ever
7 received an offer to buy any loan below par?

8 A. I'm sure we have.

9 Q. Were you similarly offended by any of those
10 offers?

11 A. What was offensive about this situation was
12 the threat to destroy the reputation of the
13 bank through using public relations oriented
14 tactics, specifically "you know you can't
15 stand the pressure of political attacks,"
16 something to that effect.

17 Q. Based again on what was relayed to you
18 since you were not on the call, was any
19 detail provided on the nature of this
20 threatened political attack?

21 MR. VESELY: Objection to the form
22 of the question.

23 THE WITNESS: I hate to do this
24 to you, but would one of you mind please
25 repeating the question?

1 Q. Sure.

2 MS. JOFFRE: Ms. Maracas, please
3 repeat the question for the record.

4 (Question read)

5 MR. VESELY: Same objection.

6 A. The nature of it was that they were going
7 to take actions to destroy the reputation
8 of the bank unless we capitulated and gave
9 them our money. It's normal, ordinary,
10 street-level extortion.

11 Q. Mr. Cohee, does OneUnited Bank commission
12 appraisals for collateral securing loans?

13 A. Yes.

14 Q. And how does the bank use these appraisals?

15 A. Banks follow processes to establish book
16 values for loans, and one part of the
17 process for establishment of the book value
18 of a loan is an appraisal process.

19 Q. What in addition to the appraisal does
20 OneUnited use to determine the book value
21 of collateral?

22 A. There are a number of factors, of which I'm
23 not going to attempt to give an exhaustive
24 list of, but they consist of things like
25 the estimated cost to dispose of a property,

1 they consist of the existence of third-party
2 guarantors, that sort of thing.

3 Q. Thank you.

4 MS. JOFFRE: I'd like to take five
5 minutes. I actually think I'm almost done,
6 so I want to sort of see what questions I
7 have left and we should be able to complete
8 this before breaking for lunch.

9 MR. EDELMAN: Okay. Thank you.

10 (Break taken)

11 MS. JOFFRE: We're back on the
12 record.

13 BY MS. JOFFRE:

14 Q. Mr. Cohee, how does the presence of a
15 third-party guarantor affect assessed value
16 of collateral?

17 MR. EDELMAN: The presence?

18 MS. JOFFRE: Yes.

19 A. It's part of the collateral package.

20 MS. JOFFRE: I ask Ms. Maracas to
21 mark Exhibit 7. This is just for the record.

22 (Exhibit 7 marked for
23 identification.)

24 Q. Mr. Cohee, I'd like you to take a look at
25 Exhibit 7, which I'll represent is a notice

1 of deposition.

2 THE WITNESS: Oh, man, did one of
3 you guys pick up my glasses?

4 MR. VESELY: Let's take a break.

5 THE WITNESS: No, no, I have them.
6 I'm sorry.

7 Q. Which I'll represent is a notice of
8 deposition of Kevin Cohee, issued by Charles
9 Street AME Church.

10 A. (Witness examines document)

11 Q. Are you familiar with this notice?

12 A. No.

13 Q. But you are aware that your deposition was
14 noticed by Charles Street AME Church of
15 Boston, correct?

16 A. Yes.

17 Q. And you appear here today pursuant to such
18 a notice?

19 A. This says Tuesday, June 19, 2012. I thought
20 this was the day I was supposed to be here.
21 I didn't know about this one right here.

22 Q. That's correct. I can represent that the
23 dates have been renegotiated, but no further
24 questions.

25 MS. JOFFRE: We're all set. Thank

1 you. I don't know if you have any questions.

2 MR. VESELY: No. Thank you.

3 MR. EDELMAN: Thank you.

4 (Whereupon the deposition was
5 concluded at 12:15 p.m.)

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ACKNOWLEDGMENT OF DEPONENT

I have read the foregoing transcript of
my deposition and except for any corrections or
changes noted on the errata sheet, I hereby
subscribe to the transcript as an accurate record
of the statements made by me.

KEVIN L. COHEE

SUBSCRIBED AND SWORN before and to me
this ____ day of _____, 20____.

NOTARY PUBLIC

My Commission expires:

1

E R R A T A S H E E T

2

IN RE: CHARLES STREET AFRICAN METHODIST EPISCOPAL

3

CHURCH OF BOSTON

4

DATE: JULY 20, 2012

5

PAGE	LINE	CORRECTION AND REASON
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(DATE)

KEVIN L. COHEE

1 COMMONWEALTH OF MASSACHUSETTS)
2 SUFFOLK, SS.)
3
4

5 I, Jeanette Maracas, Registered
6 Professional Reporter and Notary Public in
7 and for the Commonwealth of Massachusetts, do
8 hereby certify that there came before me on
9 the 20th day of July, 2012, at 9:39 a.m., the
10 person hereinbefore named, who was by me duly
11 sworn to testify to the truth and nothing but
12 the truth of his knowledge touching and
concerning the matters in controversy in this
cause; that he was thereupon examined upon
his oath, and his examination reduced to
typewriting under my direction; and that the
deposition is a true record of the testimony
given by the witness.

13 I further certify that I am neither
14 attorney or counsel for, nor related to or
15 employed by, any attorney or counsel employed
16 by the parties hereto or financially
17 interested in the action.

18 In witness whereof, I have hereunto
19 set my hand this 23rd day of July, 2012.
20

21 Notary Public
22 My commission expires 9/6/13
23
24
25

[& - asked]

Page 1

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