

1 Q. Thank you. And this email exchange between  
2 Jeffrey [REDACTED] and yourself, what is the date?

3 A. August 28.

4 Q. So, the first email is at 1:07 p.m. And who is  
5 that between?

6 A. That's between [REDACTED] and [REDACTED] of  
7 the King County Prosecutor's office and Jeffrey [REDACTED].

8 Q. And about just past half way down the page Jeffrey  
9 sends you -- [REDACTED] sends you an email. And that is  
10 dated Monday, August 28th, 2017, at 2:02 p.m. Can you  
11 please tell me what that email is and what it's about?

12 A. It's email from Jeffrey [REDACTED] to myself and  
13 [REDACTED]. And it says: "I assume this means  
14 everything but the real estate. We can take a look at the  
15 Order tomorrow before we pass the news on to the clients.  
16 May be a good time to talk about settling the rest of the  
17 case as well."

18 Q. And what email address is that sent to?

19 A. It's sent to aaron@pelleylawgroup.com.

20 Q. Thank you.

21 (Whereupon, Exhibit 98 was marked for  
22 identification.)

23 Q. And so the date of the exchange of the email with  
24 Mr. [REDACTED] born regarding the [REDACTED] case settling, what  
25 was that?

1           **AARON'S LAWYER:** Objection; assuming facts not into  
2 evidence.

3           **Q.** The email we just reviewed. What was the date of  
4 that email exchange?

5           **A.** Between who.

6           **Q.** You and Jeffrey [REDACTED]?

7           **AARON'S LAWYER:** And you're referring to Exhibit 97.

8           **MS. VAN LEYNSEELE:** Uh-huh. Yes.

9 **BY MS. VAN LEYNSEELE:**

10          **A.** It's Monday, August 28th, 2017.

11          **Q.** Was that the first that you had heard that the  
12 Chan case was going to settle?

13          **A.** I don't recall.

14          **AARON'S LAWYER:** Objection calls for -- assuming  
15 facts not in evidence with regard to [REDACTED]

16          **Q.** This is the first page of your have U.S. Bank  
17 records subject to subpoena in this case. When did you open  
18 this account?

19          **A.** I don't recall.

20          **Q.** It's on the paperwork. Sorry. It says beginning  
21 balance on September 5th.

22          **A.** September 5th. I don't know that this is when I  
23 opened the account, I'm sorry, Anne.

24          **AARON'S LAWYER:** Misstates -- you're testifying.

25          **Q.** Okay. So this is a bank statement from U.S. Bank.

1 I asked for all of your records from April 15th, 2016. This  
2 is the first page of the document that they produced to me?

3 A. Okay.

4 Q. So this is a statement from U.S. Bank. Can you  
5 look just under Silver Business Checking account, the  
6 account summary, what the first line says.

7 A. Beginning balance on September 5th zero dollars.

8 Q. Okay. And then if you go down to customer  
9 deposits. The first one that's listed is?

10 A. Oh, the very next line, sorry. \$610.

11 Q. And down below where there is a subheading that  
12 says customer deposits, number, date, reference number,  
13 amount. Can you read the first one?

14 A. The first one September 5th, for \$100. And the  
15 second is September 11 for \$450.

16 Q. Thank you. Was it your intent to deposit the [REDACTED]  
17 checks in this account?

18 AARON'S LAWYER: Object to the term "[REDACTED]".

19 But go ahead and answer if you understand.

20 A. I don't know.

21 Q. The [REDACTED] matter, you received three checks on  
22 that. Was it your intent when you opened this account to  
23 use that to deposit the checks that Mr. [REDACTED] issued to  
24 Aaron Pelley in this bank account?

25 AARON'S LAWYER: Objection; compound, assuming facts

1 not into evidence, I mean you lack knowledge.

2 Go ahead and answer if you understand the  
3 question.

4 A. I don't recall why exactly I opened this account  
5 at that time.

6 Q. Did you discuss opening this bank account with me?

7 A. Yes.

8 Q. When?

9 A. I don't recall.

10 Q. Where?

11 A. I don't recall.

12 Q. Was it at a partners' meeting?

13 A. I don't recall.

14 Q. Did we have agendas for partners' meetings?

15 A. Sometimes you had agendas and sometimes I had  
16 agendas for a partners meeting.

17 Q. And it would have been on that agenda?

18 AARON'S LAWYER: Objection; calls for speculation.

19 Q. I'm just curious when you think that you discussed  
20 that with me?

21 AARON'S LAWYER: Objection; asked and answered.

22 Q. Okay.

23 (Whereupon, Exhibit 99 was marked for  
24 identification.)

25 A uh-huh. Okay.