

Deposition of
Diana Fedder
April 11, 2022

In re The Dia Kenshalo Abrams Trust



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SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF RIVERSIDE

In re the

DIA KENSHALO ABRAMS TRUST
DATED DECEMBER 16, 2016

CRISARA ABRAMS, an
individual,

Petitioner,

vs.

Case No. PRIN2100297

KEITH HARPER, an
individual and as
trustee; and DOES 1
through 50, inclusive,

Respondent.

DEPOSITION OF DIANA FEDDER

Monday, April 11, 2022

(Conducted Remotely Through Zoom)

Stenographically Reported By:
Danielle D. Cruzat
CSR No. 13650

Job No. 10097677

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KEITH HARPER, an
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Respondent.

Deposition of DIANA FEDDER, taken on
behalf of Petitioner, conducted remotely through Zoom,
beginning at 10:11 a.m. and ending at 12:59 p.m. on
Monday, April 11, 2022, before Danielle D. Cruzat,
Certified Shorthand Reporter No. 13650.

REMOTE APPEARANCES

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Also Present:

Clinton Abrams
Vincent Taisague (Aptus Monitor)

INDEX

WITNESS: DIANA FEDDER	PAGE
EXAMINATION	
BY MR. OWENS	5
BY MR. HEALEY	93
FURTHER BY MR. OWENS	98

---o0o---

EXHIBITS

NUMBER	DESCRIPTION	PAGE
Exhibit 1	Trust Agreement of Dia Kenshalo Abrams	77

1 Conducted Remotely, Monday, April 11, 2022

2 10:11 a.m.

3 ---o0o---

4 THE STENOGRAPHER: Good morning. We are on the
5 record. The time is 10:11 a.m. My name is Danielle
6 Cruzat, CSR No. 13650. I am a code-compliant reporter.

7 Before I administer the oath to the witness, I
8 will ask counsel to agree on the record that there is no
9 objection to this deposition officer, licensed and
10 located in California, administering a binding oath to
11 the witness located in Broxton, Georgia, via
12 videoconference beginning with the noticing attorney.

13 MR. OWENS: No objection. I stipulate.

14 MR. HEALEY: No objection. I stipulate also.

15 ---o0o---

16 DIANA FEDDER,

17 having been administered an oath, was examined
18 and testified as follows:

19 ---o0o---

20 EXAMINATION

21 BY MR. OWENS:

22 Q. Hi, Ms. Fedder. My name is Matt Owens, and I
23 am an attorney representing Crisara Abrams and Clinton
24 Abrams in a dispute involving their mother's trust. And
25 I will be taking your deposition today. And then

1 counsel, Mr. Healey, may have follow-up questions as
2 well.

3 So could you just please tell us your current
4 residence address, Ms. Fedder.

5 A. My mailing address or the residential address?
6 They are different.

7 Q. Let's do mail first.

8 A. PO Box 107. And that's Broxton.

9 Q. Okay. And the residence?

10 A. 3283 Georgia Highway 268.

11 Q. And that's also Broxton?

12 A. Yes, sir.

13 Q. And what is your cell phone number?

14 A. (760) 861-1705.

15 Q. How many e-mail addresses do you have?

16 A. I think seven.

17 Q. What's -- do you have one that you consider to
18 be your primary e-mail address?

19 A. Diana.fedder@yahoo.

20 Q. Ms. Fedder, have you ever had your deposition
21 taken before?

22 A. Yes.

23 Q. About how many times?

24 A. Actually, I can't give you a number. I was a
25 federal agent for the United States Secret Service. So

1 I have had to appear in court quite a bit.

2 Q. What about depositions that are a little bit
3 different than court appearances? Have you actually had
4 a deposition like we are doing today?

5 A. Yes.

6 Q. Are you able to give an estimate of, let's say,
7 more than ten times you have been deposed?

8 A. Yes.

9 Q. More than 20 times?

10 A. Probably, yes.

11 Q. Okay. So I will kind of go just briefly
12 through the ground rules since it sounds like you have
13 an understanding of how depositions work. But just so
14 we are clear on the record, let me go through some of
15 the ground rules.

16 So if you answer a question, Ms. Fedder, we
17 will just assume that you understood the question. So
18 it's important that if one of my questions is not clear,
19 just let me know that. Okay? And it's important that
20 you answer the questions audibly with a yes, no, or some
21 other audible response just because the court reporter
22 can't take down head nods and uh-huhs and that sort of
23 thing. Okay?

24 A. Okay.

25 Q. The court reporter is going to be taking down

1 all the words that are spoken today. So my questions,
2 your answers, any objections. And those are going to
3 get put into a booklet format that we refer to as the
4 deposition transcript.

5 You will have an opportunity to review the
6 transcript once it's prepared. You will also have an
7 opportunity to make changes to your testimony as part of
8 that review process. However, I should caution you that
9 if you make any material changes, I or any counsel can
10 comment on those changes at the time of trial, and that
11 could impact your credibility at that time.

12 Does that all make sense?

13 A. I understand.

14 Q. I don't think this is going to be an all-day
15 event, but you should certainly feel free to take breaks
16 whenever you need to. And the only thing I'd ask is if
17 we do have a question pending, let's try to go ahead and
18 get an answer to the question. But other than that,
19 just let us know if you need a break and we'd be happy
20 to take a break.

21 A. Okay.

22 Q. You understand, Ms. Fedder, that you are under
23 oath today?

24 A. Yes.

25 Q. And you understand that's the same oath that

1 you would give in a court of law that requires that you
2 tell the truth, right?

3 A. Yes.

4 Q. Is there any reason that you can't give us your
5 best testimony today?

6 A. No.

7 Q. Have you ever been a party to a lawsuit?

8 A. I believe so. Yes. With a gardener.

9 Q. Okay. When was that lawsuit?

10 A. Maybe about 2003. It was with a landscaper.

11 Q. What was that lawsuit -- what was the nature of
12 the case?

13 A. The landscaper laid pavement, and the pavement
14 was bowed. I remember that being a problem. And
15 something to do with he didn't finish the job. It was a
16 small -- but I think that was a civil suit. But I
17 believe it was also considered a lawsuit even though it
18 was a civil suit. Yeah.

19 Q. Were you the person that initiated that
20 lawsuit?

21 A. Yes.

22 Q. Other than that one case where you had a
23 dispute with a gardener or the landscaper, can you
24 recall ever being a party to any other lawsuit?

25 A. No.

1 Q. Ms. Fedder, I will ask you a couple questions
2 that are just kind of unique to the remote deposition
3 setting. So let me just ask you, is there anyone else
4 in the room with you right now?

5 A. No.

6 Q. And are you talking to us on a laptop or an
7 iPad? Or what are you using to talk to us?

8 A. My cell phone. I couldn't sign in with my
9 computer.

10 Q. Okay. So you are a cell phone. It's a small
11 screen. I'm going to assume there is nothing else open
12 on the screen other than the Zoom right now; is that
13 right?

14 A. No.

15 Q. Okay. Did you do anything at all to prepare
16 for your deposition today?

17 A. Not to prepare. I just got my paperwork
18 together. That's all. I haven't reviewed anything.

19 Q. What paperwork, if you can just describe
20 generally, did you get together?

21 A. Receipts, the copy of the power of attorney, a
22 copy of the will, all the documents sent to me from your
23 office. That's it. Yeah.

24 Q. When you say "copy of the power of attorney,"
25 are you talking about the power of attorney for Dia

1 **Abrams?**

2 A. Yes, sir.

3 **Q. And the will, that's the will for Dia Abrams?**

4 A. Yes, sir.

5 **Q. Those receipts, can you describe for us**
6 **generally what they relate to?**

7 A. Any receipts for paying for Dia's mortgage --
8 the mortgages; any receipts to pay her electricity, her
9 utilities; pretty much just all her bills. I kept a
10 running list.

11 **Q. Did you keep that running list in some sort of**
12 **document on a computer?**

13 A. I did some in writing, in a ledger, and then I
14 started doing it on Excel.

15 **Q. Okay. And let's talk about this a little bit.**
16 **So why is it that you have receipts for payments related**
17 **to Dia's expenses?**

18 A. When Dia signed her new will, she had told me
19 that she put me down as executor. We had discussed that
20 prior. So when she went missing, Harper said that he
21 was the trustee and that I was also part of it. And
22 Keith Harper is not meticulous like I am with
23 documenting. So I took over as the person to keep
24 running track of every detailed expense or payment for
25 him.

1 Q. So you -- in this will that you are describing,
2 you are the named executor?

3 A. No. I think Keith Harper is the executor.

4 Q. But you were helping him even though he was the
5 executor?

6 A. I was -- yes. I was the alternate. So
7 whenever he would go talk to a bank or with the
8 attorney, I would go with him and write notes. And I
9 would just make sure that -- as my part, I would just
10 make sure that everything was detailed in an order in
11 the event it was needed for court or what have you or
12 somebody came in to review the trust or her estate.

13 Q. Okay. Are you still helping Mr. Harper with
14 any of those tasks now?

15 A. No, sir.

16 Q. When did you stop helping him?

17 A. It was just -- I don't know the exact date. I
18 want to say it was December of 2020. Or maybe the
19 beginning of January of '21.

20 Q. And what happened then that caused you to stop
21 helping Mr. Harper with those tasks?

22 A. I was unable to do so. I moved back closer to
23 my parents. My mother has been hospitalized and needed
24 medical attention, so I came back to take care of her.

25 Q. And that would have been in Georgia?

1 A. In Florida.

2 Q. So let me see if I can get the time frame here.
3 Is it your understanding that Dia Abrams went missing at
4 some point in June of 2020?

5 A. June 7th, if I remember the date correctly.

6 Q. And then is it -- was it the case that shortly
7 thereafter you started helping Mr. Harper with the tasks
8 you described earlier?

9 A. Pretty much from the next day when I found out
10 about her being missing.

11 Q. So from June 2020 to December 2020 or perhaps
12 January 2021, you were helping Mr. Harper with those
13 tasks you described earlier?

14 A. Yes. I was -- I was documenting everything.
15 And everything I did, I discussed with Dia's best friend
16 to make sure we were on the same page.

17 Q. Did you ever provide to Mr. Harper a copy of
18 that Excel spreadsheet you were talking about?

19 A. Yes, sir.

20 Q. Did you ever provide to Mr. Harper a copy of
21 that handwritten ledger you were talking about?

22 A. No, sir. I took everything from that ledger
23 and then I put it onto Excel. But I still kept the
24 handwritten. I didn't get rid of it.

25 Q. How did you provide the Excel to Mr. Harper?

1 Was that in an e-mail? Or how did you deliver it to
2 him?

3 A. In person.

4 Q. So it was --

5 A. I don't think he had a computer.

6 Q. Did you give him a printed out hardcopy of the
7 Excel spreadsheet?

8 A. Yes, sir.

9 Q. What about all the receipts you were talking
10 about? Do you still have those in your physical
11 possession now?

12 A. No, sir. Let's see. Just the ones from a bank
13 account I set up for her. Let's see. JPMorgan Chase.
14 I have a deposit, a few deposit slips for JPMorgan Chase
15 for payments. All the other books -- all the other
16 receipts I gave to him, if I recall. I don't have them
17 on my person. So I gave it to him in a folder.

18 Q. Okay. Are -- what I'm trying to figure out,
19 Ms. Fedder, if there are any records in your possession
20 that Mr. Harper didn't have related to Dia's financial
21 affairs.

22 Do you believe any such records exist?

23 A. I gave him copies of the bank statements. So
24 he should have all that. And I think he also obtained
25 that from the bank, from Chase. I set up an account for

1 her at Bank of Hemet so that way it all went to an
2 account that I could pay her bills from. It was in my
3 name, but I wanted a documented record of any money that
4 came in or went out.

5 **Q. When you say the bank account was in your name,**
6 **you mean it just said Diana Fedder as account owner?**

7 A. Yes, sir. I opened an account with my name on
8 it because we had no access to her accounts. So we
9 could not deposit money into her accounts and we could
10 not pay bills with her accounts. So the easiest way
11 for -- to pay for her bills was for me to set up a bank
12 account in my name. Any money that came in or any money
13 that went out were all Dia's, so that way there was a
14 nice transaction payment to Southern California Edison,
15 or water payments, fire insurance. That all -- any
16 checks written, even though my name was on it, came from
17 her account.

18 **Q. When you say "her account" --**

19 A. That I set up. Sorry.

20 **Q. Yeah. Okay. All right. And that Bank of**
21 **Hemet, is that -- do you recall if that's the one on**
22 **Florida Avenue in Hemet, California?**

23 A. That's the main branch. The other branch is in
24 Anza. And then that account was closed out.

25 **Q. How do you spell Anza?**

1 A. A-N-Z-A.

2 Q. Does Mr. Harper have copies of all the bank
3 statements from the Bank of Hemet account?

4 A. Yes. I would provide him a copy every month
5 when we went over the financials.

6 Q. Do you have any idea if that account is still
7 open?

8 A. It should not be. I withdrew the money and
9 gave it to Keith Harper when I left.

10 Q. Did you do, like, a cashier's check? Or what
11 did you do?

12 A. I know it was not a cashier's check. I believe
13 it was just a written check.

14 Q. That's okay. It's not a big deal if you can't
15 recall.

16 A. It was a check. It was a check. Yes.

17 Q. Okay. What's the highest balance you recall
18 ever being in the bank account at any given time?

19 A. Well, I started it with \$25 of my money to get
20 it started. And then we started earning money on
21 Airbnb. And the highest amount we got to was 11 -- no,
22 13,000. And that included income from a wedding. But
23 usually the running total was a thousand a month as a
24 balance.

25 Q. So the income -- what income sources did

1 **Ms. Abrams have during that time period when you were**
2 **managing that account?**

3 A. She had no income sources. She had just
4 started. So she has a residence called Sky High.
5 That's how I know Sky High Ranch. I don't know the
6 address. It's just down the street from Bonita Vista.
7 I know she obtained rent from those individuals.

8 However, when she went missing, they absconded.
9 So there was no rent coming in from that. That money
10 she would use to pay her caretaker, Isidro. So there
11 was no money to pay Isidro to take care of everything.
12 So Julie Stanford and I -- or let me step back.

13 Dia and I set up Airbnb at her Garner Valley
14 house in February, and we had been cleaning that house
15 out, moving everything to Bonita Vista, and we had set
16 up Airbnb to begin. I think it was in May that it just
17 started. And we had a few reservations. So we had that
18 money coming in for a short time.

19 And then when Dia went missing and we found
20 that there was no money to pay her bills, her best
21 friend, Julie Stanford, and I came up with an idea to go
22 forth and start cleaning Bonita Vista, which is
23 something Dia and I were going to work on once Garner
24 Valley was up and running. She had already started, but
25 we weren't there yet.

1 Q. How many properties did she own at the time she
2 went missing?

3 A. Four. Garner Valley. Bonita Vista has two --
4 two properties there. I think one is land and one is
5 the house.

6 Q. When you say "the house," you mean that was
7 Dia's primary residence?

8 A. Yes. And then there was Sky High.

9 Q. I just want to make sure I'm on the same page
10 with you.

11 I have the Sky High property, right? She owned
12 that one?

13 A. Yes.

14 Q. And there were tenants in that one around the
15 time that she went missing. But they shortly,
16 thereafter, vacated the property; is that right?

17 A. Within two days. Yes.

18 Q. Okay. And then I have -- just going down a
19 list -- Bonita Vista, the land with no residence on it?

20 A. Correct.

21 Q. And then as a third one, I have Bonita Vista
22 with the residence on it where Dia lived, right?

23 A. Yes.

24 Q. And then I have Garner Valley. That's the
25 fourth one?

1 A. Yes, sir.

2 Q. Was there a structure on Garner Valley?

3 A. It was a house. It was a five-acre property
4 with a house and a barn.

5 Q. Okay. And you had been working with Dia on
6 basically making Garner Valley an Airbnb before she went
7 missing?

8 A. Yes.

9 Q. After she went missing, did Garner Valley
10 continue to operate as an Airbnb?

11 A. Yes.

12 Q. Do you know how long?

13 A. There, not for long. There was a permanent
14 tenant that moved in, I think, in September of 2020.

15 Q. Do you know if that tenant is still there?

16 A. No, they are not.

17 Q. Do you know if there is any tenant there now?

18 A. I have no idea.

19 Q. Okay. Do you know how long that tenant that
20 moved in September 2020 remained?

21 A. I want to say six months.

22 Q. Let's talk about the Sky High property. So
23 after those tenants vacated within days of Dia going
24 missing, do you know if there were ever any other
25 tenants that then lived at that property?

1 A. I do not have personal knowledge of that. I
2 did go to the residence and turn everything off. I have
3 never been there before but made sure the gas and water
4 was off. I was told that those same tenants came back.
5 But I, again, never went there and never saw them. So I
6 don't know for a fact.

7 **Q. What about during that roughly six-month period**
8 **when you were helping with the bank account, did you**
9 **ever see income coming in from that Sky High property**
10 **during that time period?**

11 A. Let's see, I believe at the top of my head I
12 remember -- I have documented Sky High rent. July 3rd
13 and rent August 1st.

14 **Q. Of 2020?**

15 A. Yes. And September 1st.

16 **Q. What was the amount, the monthly rental amount?**

17 A. 2,000. So I believe Dia accepted \$2500 a month
18 at Sky High. The renters there left. The house was
19 raided by the police department, and they took off. And
20 they came back -- I was told they came back at \$2,000 a
21 month rent. And Keith Harper would obtain the money and
22 would give it to me to put into the account to pay the
23 bills.

24 And then after he paid off that property, Sky
25 High property, he used his own money for that. He

1 started keeping whatever rent came in, which I did not
2 agree with. I felt . . .

3 Q. What do you mean keeping it, keeping it
4 personally like it was his money?

5 A. Well, to pay himself back for purchasing the
6 property. I believe he paid it off. It was \$20,000 to
7 pay off the property.

8 Q. The mortgage on the property?

9 A. Yes, sir.

10 Q. When the police raided, what was that about?
11 Was that, like, a marijuana grower or something?

12 A. I do know that they were growing marijuana.
13 Dia had told me that as well as Isidro. But I don't
14 know if that was the main reason they went there or if
15 it was because of the Dia situation in conjunction.

16 I did have a copy of that search warrant that
17 was left on the counter. I want to say Harper has that,
18 but I can look to see if I have a copy of it. I will
19 look for it.

20 Q. The Sky High property, that has a house on it?

21 A. It's a mobile home.

22 Q. All right. Let's talk about the wedding that
23 you mentioned. Where was that wedding held?

24 A. The wedding was held in the pasture.

25 Q. What property?

1 A. Oh, I'm sorry, Bonita Vista.

2 **Q. The Bonita Vista property with a house on it?**

3 A. Yes, sir.

4 **Q. And how did it come to be that there was a**
5 **wedding on the property?**

6 A. We were having problems with obtaining rent or
7 to raise money to pay bills. In the short time that we
8 had or that I was there, we were able to pay 18 months
9 worth of back bills that were owed. But we still didn't
10 have enough money coming in to pay for the upkeep of the
11 house.

12 So we came up with a plan to host weddings or
13 engagement photos at her property. Dia had had weddings
14 there numerous time before and she wanted to start doing
15 that again. So we decided we could have outdoor
16 weddings, but we would see if it would be feasible to do
17 it because we would have to bring in chairs and tables.
18 And there was a lot of work to go into that. It did
19 raise some money. But it was a lot of work and a lot of
20 donated time from Dia's friends to make it happen.

21 **Q. So did you end up just doing the one wedding,**
22 **then?**

23 A. Yes, sir.

24 **Q. How did you go about advertising the**
25 **availability of the property for a wedding?**

1 A. WeddingWire.

2 Q. Were there ever any occasions when people
3 reserved the property to do other events? Like, you
4 mentioned engagement photos. Was there anything along
5 those lines?

6 A. They did not have to book for wedding photos or
7 anything. They would -- most of the people that came
8 were people that Dia knew. There were no structured
9 events that I recall. Just family outings.

10 Q. What about anything that resulted in someone
11 paying a fee to you or Mr. Harper that you put in that
12 account?

13 A. Airbnb at Bonita Vista.

14 Q. Okay. So the Bonita Vista property at the
15 house, I understand that you set that one up as an
16 Airbnb. Did that continue to run the entire roughly six
17 months when you were helping out?

18 A. Yes.

19 Q. And then the Bonita Vista property with the
20 land, I'm going to assume there was no income coming in
21 on that one; is that right?

22 A. No.

23 Q. No income for that one?

24 A. No income.

25 Q. Garner Valley was an Airbnb after Dia went

1 missing, right?

2 A. And then a permanent renter.

3 Q. Okay. Other than what we have just gone over
4 here, can you think of any other income sources that
5 were coming in during that six-month window when you
6 were helping out?

7 A. There was a garage sale that Dia and I had set
8 up prior to her going missing. She had everything
9 separated to sell, like old towels. What else? Old
10 dishes, stuff she would buy at T.J.Maxx that she had too
11 many of that she put aside. And her and Isidro had --
12 we had done this every year. So all of her stuff was in
13 bins, and we had that garage sale. And we used that to
14 buy feed for the animals.

15 Q. Was that one occasion or multiple?

16 A. Yes. No, just one occasion.

17 Q. Do you recall approximately how much money you
18 got from the garage sale?

19 A. I think it was like \$500.

20 Q. And did you put that money into that account at
21 Bank of Hemet?

22 A. Yes.

23 Q. All right. Now, we got the garage sale on the
24 list. Can you think of any other income sources during
25 that six-month window that we have not already covered?

1 A. No, sir.

2 Q. Let me go back to your -- the idea of your
3 deposition today.

4 Did you communicate with anyone about the fact
5 that you were having a deposition today?

6 A. Julie Stanford.

7 Q. When did you -- and I'm sorry, could you, for
8 the benefit of the court reporter and the record, could
9 you spell her last name?

10 A. S-T-A-N-F-O-R-D.

11 Q. When did you speak with Ms. Stanford?

12 A. She called me on Saturday.

13 Q. And on Saturday, you and Ms. Stanford discussed
14 your deposition?

15 A. No. Just that she received a court thing in
16 the mail. And I explained what a deposition was.

17 Q. Did you discuss with Ms. Stanford the substance
18 of any testimony that you plan to offer?

19 A. No.

20 Q. Did Ms. Stanford express to you the substance
21 of any testimony she plans to offer at her deposition?

22 A. No.

23 Q. Did you talk to Ms. Stanford about the trust or
24 will or any estate planning document of Dia Abrams?

25 A. No. Just that it existed.

1 Q. So you did discuss the estate plan during the
2 conversation on Saturday?

3 A. Oh, no, not on Saturday.

4 Q. Have you had other conversations with
5 Ms. Stanford where the idea of Dia Abrams' estate plan
6 came up?

7 A. All of 2020 after her disappearance.
8 Everything I did in Dia's name, I ran through Julie
9 Stanford as Julie Stanford, in my opinion, was her best
10 friend. And the only reason I was asked to step in
11 regarding the estate was because I'm meticulous on my
12 paperwork whereas Julie can get flustered. And she has
13 a big heart. So that's why I would run everything
14 through Julie.

15 Q. This bank account that was set up at Bank of
16 Hemet, did you have a conversation with Mr. Harper about
17 whether it made sense to put the bank account in his
18 name?

19 A. I don't recall that conversation.

20 Q. I mean, he was the -- it sounds like -- you
21 correct me if I'm wrong. But it sounds like under the
22 documents you were describing, the will and the power of
23 attorney, it sounds like Mr. Harper was named first and
24 you were named as alternate; is that right?

25 A. Yes. Yes.

1 Q. So, I guess, I'm just trying to figure out why
2 you guys decided to list you even though you were the
3 alternate.

4 A. He -- he was what I would call old school. He
5 did not have a laptop. He was putting out a lot of
6 other fires with trying to maintain the land. So I took
7 over the Airbnb, everything under him. So I had
8 meetings with him, if not weekly, every other week in
9 regards to the Airbnb and the accounts and the bank
10 statements and what's paid and not paid. So I just took
11 care of the financials as one less thing for him to have
12 to care for since there was so much to have to deal
13 with.

14 Q. And he was okay with the account being in your
15 name?

16 A. Yes.

17 Q. Ms. Fedder, let's talk about your background a
18 little bit. Can you tell me where you are from
19 originally?

20 A. I'm a government brat. I moved all over the
21 United States with my father being in service and also
22 with the federal government, and then I was transferred
23 numerous time with the federal government for
24 employment. But I'm originally from the southeast.

25 Q. Anyplace in particular in the southeast?

1 A. I would say anywhere between Jacksonville,
2 Florida, and Hilton Head, South Carolina. That's where
3 all my entire family is from.

4 **Q. Where did you go to high school?**

5 A. I went to two different high schools. One in
6 Savannah and one in Texas.

7 **Q. Where in Texas?**

8 A. Austin.

9 **Q. Did you attend a university or college of any**
10 **kind?**

11 A. Yes. In Austin.

12 **Q. University of Texas?**

13 A. No, sir. St. Edward's University.

14 **Q. Did you obtain a degree from St. Edward's**
15 **University?**

16 A. Yes.

17 **Q. What degree?**

18 A. Bachelor's of science.

19 **Q. Did you ever obtain any other degrees from any**
20 **institution?**

21 A. I attended other institutions, but I have not
22 finished my master's.

23 **Q. Are you in a master's program now?**

24 A. No, sir.

25 **Q. Did you pursue a master's at some point?**

1 A. Yes. After -- when I was a parole officer in
2 the state of Florida, I was working on my master's in
3 criminal justice.

4 **Q. Are you currently employed?**

5 A. No, sir.

6 **Q. When's the last time you were employed?**

7 A. I retired from the secret service
8 September 30th of 2017.

9 **Q. How long had you been with the secret service**
10 **before you retired?**

11 A. 23 years.

12 **Q. What was your role at the secret service?**

13 A. I was a special agent.

14 **Q. Did you -- in that 23 years, did you work at**
15 **the same location, or did you move around? Or how did**
16 **that work?**

17 A. I moved around.

18 **Q. Where was the last place that you were working**
19 **physically when you retired from the secret service?**

20 A. Riverside, California.

21 **Q. And how long had you been working out of**
22 **Riverside Secret Service?**

23 A. I believe it was since 2004, I believe.

24 **Q. Can you describe generally what the job duties**
25 **were for you as a special agent?**

1 A. Oh, wow. I was a criminal investigator, so I
2 would investigate counterfeiting, electronic funds
3 transfers, mortgage fraud, any type of financial fraud
4 committed against the United States. What else?

5 We also did a lot of protection. So we would
6 be tasked with having to travel at the needs of the
7 service at any given time to protect a foreign
8 dignitary, the president, vice president, or their
9 family member, wherever they happened to go.

10 I would also -- for a long time I was in charge
11 of recruitment, recruiting other special agents, doing
12 background checks. I have a high clearance level for
13 that. Not everybody had the same clearance level. And
14 I had SCI clearance level. I would give speeches at
15 colleges and businesses and do special investigations,
16 any investigations between other special agents and the
17 public, like car accidents or shootings.

18 **Q. Okay. Let's talk about your relationship with**
19 **Ms. Abrams. How did you know her?**

20 A. We both lived in Garner Valley. I knew of her
21 before moving up there, but I don't recall having spent
22 too much time with her prior to that. We would see each
23 other at events. It's a very small community.

24 **Q. Do you recall when you first met her?**

25 A. It probably was at Ronnie and Sally Imel's

1 house in Mountain Center. They have been friends with
2 her for over 20 years. And then after that, we started
3 spending time together at Bunco.

4 **Q. And then at some point did you become friends?**

5 A. Almost immediately. We had a lot of things in
6 common regarding our children. And we always use to
7 tease that she was like my older sister. We were the
8 same person. She was just a little bit older. And she
9 was -- I always said she was always prettier.

10 **Q. How many children do you have?**

11 A. Two.

12 **Q. What are their ages?**

13 A. 17 and 18.

14 **Q. And are you married?**

15 A. I'm a widow.

16 **Q. And what's the name of your deceased spouse?**

17 A. Daniel Fedder. He was killed in action in
18 Afghanistan.

19 **Q. Are you currently engaged to be married?**

20 A. Yes.

21 **Q. Who is your fiance?**

22 A. I don't believe that is a relevant question.

23 **Q. Potential witness. He would certainly be**
24 **relevant if I filed a motion to compel, which I don't**
25 **think anyone wants us to have to do.**

1 A. No. He's in law enforcement locally.

2 Q. What's his name?

3 A. Harvey Tanner.

4 Q. I'm sorry?

5 A. Harvey Tanner.

6 Q. What kind of things, other than Bunco, did you
7 and Ms. Abrams do together?

8 A. We would go shopping. We -- I was her little
9 motivator. So I would come over and help her clean. I
10 would help her organize.

11 (Clinton Abrams joined the proceedings.)

12 THE WITNESS: Help her -- pretty much organize.
13 She had a lot of stuff. So we would organize it, go
14 through it. I helped her emotionally. She would help
15 me emotionally.

16 BY MR. OWENS:

17 Q. How frequently would you estimate you would see
18 her before she went missing?

19 A. Couple times a week, three or four.

20 Q. Would that typically be at her house, your
21 house, out in town? Or how would you describe where you
22 would see her?

23 A. I want to say all of it was between my house in
24 Garner Valley and her house in Garner Valley.

25 Q. How far away from her house did you live in

1 **Garner Valley?**

2 A. A mile.

3 **Q. Did you ever live on any of her properties?**

4 A. No.

5 **Q. Did you ever spend the night at any of her**
6 **properties?**

7 A. I did spend the night at Bonita Vista after her
8 disappearance.

9 **Q. Was that the only time?**

10 A. Yes. Not before her disappearance.

11 **Q. Why did you spend the night at Bonita Vista?**

12 A. The night -- well, not the night of her
13 disappearance. I didn't find out until the next day.
14 So it was the day after her disappearance. We had been
15 searching all day. I had gone home to feed my dogs and
16 to feed Dia's animals. She had two horses, two sheep, a
17 bull over in Garner Valley. So I had to go feed them.
18 Oh, and a mule.

19 And then I got a call from Harper, and he was
20 distraught and -- as he had been all day. And I asked
21 him if he was okay, and he said no.

22 And I said, Do you need me to come out there?

23 And he said, Yeah, I would appreciate that.

24 And I said okay. So I came out that evening.

25 I want to say that was the same evening that Clinton

1 came out also. He spent the night there.

2 **Q. Did you ever stay any additional nights at any**
3 **of her properties after she went missing?**

4 A. I did when Harper was out of town. Yes.

5 **Q. Was that also at the Bonita Vista property?**

6 A. Yes.

7 **Q. Do you have --**

8 A. Well, yes. Yes.

9 **Q. Do you have an estimate of approximately how**
10 **many times you stayed at the Bonita Vista property when**
11 **Harper was out of town?**

12 A. Maybe five or six nights total.

13 **Q. And what was the purpose of you staying at the**
14 **Bonita Vista property when Harper was out of town?**

15 A. To care for the animals.

16 MR. OWENS: All right. We have been going
17 about an hour. Good time to take a break. Let's go off
18 the record.

19 (Recess.)

20 MR. OWENS: Okay. Let's go back on the record.

21 BY MR. OWENS:

22 **Q. Ms. Fedder, when did you last see Ms. Abrams?**

23 A. I know I -- I want to say it was Thursday. And
24 we talked on Friday. On Thursday, we were getting the
25 Garner Valley house ready for a tenant checking in on

1 Friday. And she was there late cleaning.

2 Q. So you saw her at the Garner Valley property.
3 That was the last time you saw her?

4 A. Yes. On Thursday. And then I spoke to her on
5 Friday. She needed a recommendation for a window
6 cleaner on Friday.

7 Q. Did you provide a recommendation?

8 A. Yes.

9 Q. Do you recall who you recommended?

10 A. It was a lady by the name of Dawn, D-A-W-N, who
11 lives in Anza.

12 Q. Did you discuss anything else with Ms. Abrams
13 on that phone call?

14 A. No.

15 Q. Going back to the --

16 A. We texted quite a bit.

17 Q. Let me back up a step.

18 That Friday when you talked to her about the
19 window cleaner, was that a conversation that you had by
20 phone or was that a conversation by text message?

21 A. That was via -- actually, it was via Facebook.

22 Q. Facebook Messenger?

23 A. I saw it on Facebook, and then I texted her the
24 information on my telephone.

25 Q. Okay. So you didn't actually speak to her

1 either on the phone or Facebook or anything like that?

2 A. No, sir.

3 Q. All right. Let's go back to the Garner Valley
4 property where you saw her that Thursday. Was anyone
5 else there?

6 A. No. Earlier that day, she was running errands
7 down the hill. And she was running late. So I fed the
8 animals for her at Garner Valley, and then she wanted to
9 finishing cleaning the Garner Valley house. And I asked
10 her if she wanted me to go over and help, and she didn't
11 respond on Thursday. But she has a habit of not
12 carrying her phone all the time. So -- but I remember
13 talking to her after that via text that she was there
14 quite a few hours that previous night. And it took her
15 a lot longer than she thought.

16 Q. When you -- okay. So that day when you were
17 with her at the Garner Valley property getting it ready
18 for the tenant, did you stay at the property until she
19 left, or did you leave before she did?

20 A. No. We didn't see each other at the same time
21 at that house on that day.

22 Q. Okay. So when is the last time that you saw
23 Ms. Abrams?

24 A. More than likely the day before.

25 Q. Where did you see her?

1 A. It would have been at the Garner Valley house.

2 **Q. Was anyone else present?**

3 A. I don't believe so. No.

4 **Q. How long were you there?**

5 A. I want to say we were there about three hours.
6 We were making up beds, putting sheets on the beds, that
7 kind of thing.

8 **Q. Do you recall anything that you discussed with**
9 **her during that three hours?**

10 A. Well, we discussed anything she didn't want in
11 there that Isidro would take with her. Well, we would
12 put it in the garage so no one can touch it. We bought
13 dishes at the dollar store so they wouldn't use her
14 dishes. She was excited by the fact that she would have
15 money to pay the mortgage from the rent. She had liked
16 the couple that stayed there the weekend prior. They
17 invited her to stay for a barbecue and she introduced
18 the children to her farm animals.

19 And she was excited to get the Bonita Vista
20 house going and that she had put aside a bunch of pairs
21 of jeans for me. And I made a joke that I couldn't fit
22 one leg into one of her pairs of jeans. She's a size
23 zero and I was a size 12. Wasn't going to happen but
24 thanks for the thought. But she would play down her
25 looks. But, you know, we would tease each other.

1 Q. Okay. So let's fast forward to after she went
2 missing. I think you mentioned earlier that Mr. Harper
3 called you. Is he -- well, let me back up a step.

4 How did you find out that Dia had gone missing?

5 A. I received a call from Julie Stanford.

6 Q. What did she tell you?

7 A. She called me and asked me if I had spoken to
8 Harper. And I'm like, No, why would I talk to Harper?
9 I have never had a phone conversation with him before.

10 So -- and she goes, Dia is missing.

11 And I'm like, What are you talking about?

12 And she gave me a quick rundown and said,
13 Harper wanted your number to give you a call because he
14 didn't have your number.

15 And I said, Well, I think I have his number
16 from when Dia had surgery because I had to watch Ruby,
17 her dog. And when she came home from the surgery, I had
18 to bring Ruby back to her, back to Harper. She wouldn't
19 come out of the little house. Harper was there working
20 on her truck.

21 So I believe I called him because I had his
22 number in my phone. And then he told me what was
23 happening.

24 Q. What do you recall him telling you?

25 A. That they had had a conversation in the

1 kitchen. It was lunchtime. They had just gotten
2 back -- or she had just gotten back from Julia's house.
3 I think Julia lives across -- down the street from her.
4 It's one of her friends. They had come back from
5 Julia's house. Then they were going to discuss or did
6 discuss what they were going to do for the day. Her
7 plan was to go to Garner Valley later in the day to work
8 with Rocky and Cute Face, her horses, and feed them and
9 clean the stalls.

10 He said that he went to the field to --

11 **Q. You are talking about Harper?**

12 A. Yes, sir.

13 **Q. What field?**

14 A. There is a pasture behind where the animal
15 enclosures are. It's in the -- a back field. You can't
16 see it from the house. It's the west side of the
17 property.

18 **Q. Okay. When did he go to the field?**

19 A. He said after they had lunch. I was under the
20 impression 1:30 or 2 o'clock.

21 **Q. So after you find out she went missing, it**
22 **sounds like some people started coming up with a plan to**
23 **provide care for the animals and things like that.**

24 **Did you also discuss potentially searching for**
25 **Ms. Abrams?**

1 A. Well, we didn't think of the animals at first.
2 When he said she went missing, he thought that she went
3 for a hike. That was typically her thing, to go for a
4 hike up the hill. And there was a spot she would sit
5 and read her book.

6 And so we were under the assumption that she
7 went up the hill and she must have fallen down or got
8 bit by a rattlesnake. She usually carries a gun with
9 her when she goes on the hikes because of rattlesnakes.
10 It's also a very big area for mountain lions. And we
11 had a couple of bears that had just been released up
12 there.

13 So typically she would carry a weapon with her.
14 I remember her posting a picture of a rattlesnake a week
15 or two prior. So we were thinking she must have gotten
16 hurt up the hill.

17 So I said, I'm going to get some people
18 together. I'm going to bring my ATV over, and we'll get
19 people to come out and help search.

20 So I drove my ATV over to Ronnie and Sally
21 Imel's house to put my ATV on a trailer. He brought me
22 out there. We gathered about 20 people to immediately
23 start searching. As people started calling, we asked
24 them to bring water or feel free to come out and search.
25 People that had horses wanted to donate their time to

1 ride up the hills to try to find her also.

2 Q. We are talking about searching at the Bonita
3 Vista property; is that right?

4 A. Yes.

5 Q. Approximately, when did you begin that search?

6 A. I think I got the call around 8:30 or 9:00 in
7 the morning. I think it was -- so probably by 10:00.

8 Q. And there were, you are estimating, about 20
9 people that participated in that search?

10 A. Yes.

11 Q. Did you find anything of interest in connection
12 with that search?

13 A. Nothing.

14 Q. So you mentioned that she would carry a weapon
15 when she would go hiking. Do you know what weapon she
16 would carry?

17 A. I do not know. I just know that she was armed.
18 I know in a picture she posted on Facebook it was a
19 rifle of some sort. But she always had a handgun in her
20 car or in her purse. So all I know is that she would
21 hike armed. That's all.

22 Q. Do you know if any of her handguns or rifles
23 were missing after she went missing?

24 A. No.

25 Q. Did you ever remove any handguns or rifles from

1 any of her properties after she went missing?

2 A. I did.

3 Q. What did you remove?

4 A. After all the searches were conducted by the
5 police department and they left the property unattended,
6 I went back with a neighbor. Harper was out of town.
7 So I was trying to get the animals fed at Bonita Vista
8 as well as Garner Valley.

9 Ruby was diagnosed with some type of uterine
10 cancer and had special food. And a bunch of her food
11 was in Dia's truck. So we went in the truck to get that
12 special medicated food for her. So I took a leash, a
13 dog bowl, and a couple of cans of her medicated dog
14 food.

15 And on the front seat of the unlocked truck was
16 a handgun. And being in law enforcement, you do not
17 leave a loaded handgun unattended period. So I took the
18 handgun back to my friend's house, and I said, I just
19 want you to see what I have; we took this from the
20 truck; I'm going to secure it in my safe. And I secured
21 it in my safe . I told Harper about it, and I told the
22 police about it.

23 Q. Who was the friend that you showed the gun to?

24 A. Ronnie and Sally Imel.

25 Q. So you secured it in a safe where? At your

1 house?

2 A. At my house, yes, sir.

3 Q. And at some point did you give it to
4 Mr. Harper?

5 A. Yes. He asked for it. And since he's the
6 trustee, I had to give it to him.

7 Q. When did that happen?

8 A. Oh, a couple months in. I remember we were a
9 couple months in. It wasn't right away.

10 Q. So it would have been late summer, early fall
11 of 2020, somewhere in there?

12 A. I want to say late -- maybe like end of
13 September/October because I had been trying to talk with
14 the police department, and I kept calling them and
15 calling them. They would not return calls. I have even
16 told them I had her weapon that was on the front seat of
17 the car, that it was left there, so what weapon could
18 she have taken with her to go on a hike?

19 And so when he asked for the weapon, I had to
20 give it to him. But when I finally did get to the
21 police department, they had asked about it.

22 Q. The police and the authorities never asked you
23 to give them that weapon?

24 A. No. I called numerous times leaving messages.

25 Q. Other than that -- and sorry if you mentioned

1 this, but what type of gun was it?

2 A. Just a handgun. I don't know the brand. I
3 know it was a small handgun.

4 Q. Do you remember, like, the caliber --

5 A. I'm not very familiar --

6 Q. -- like 22 or 38 or anything like that?

7 A. Ronnie Imel would know. He knows his guns. I
8 personally am not -- I don't recall. I know that it was
9 not a high caliber because it wasn't a big gun.

10 Q. Okay. No problem. Yeah, sitting here right
11 now, you don't recall what the caliber was, correct?

12 A. No, sir. No.

13 Q. Did you ever remove from any of Ms. Abrams'
14 properties any other items that belonged to her after
15 she went missing?

16 A. Just the items that she had put aside for the
17 garage sale. And those were marked.

18 Q. Those have been set aside where? At her Bonita
19 Vista house?

20 A. Yes. In a trailer. It was a cargo trailer.

21 Q. Okay. Going back to the search for a minute,
22 when you and about 20 people searched the property, did
23 you search the inside of her house as well?

24 A. We searched the inside of the house. There
25 were several of us. We searched all the houses. We

1 searched the attic of the game room. We searched
2 vehicles, the outdoor kitchen, the barn areas, Harper's
3 vehicles and his RV. And then all of the actual
4 property. Also the shipping containers. Those were
5 searched.

6 **Q. What were you looking for?**

7 A. Her. Just her.

8 **Q. Okay. Did you find anything at all that**
9 **appeared to be a clue of maybe where she had gone?**

10 A. No, because her purse was still in the house.
11 And Ruby was still at the house. And she never went
12 anywhere without Ruby.

13 **Q. Do you know if -- do you know if her keys were**
14 **still at the house?**

15 A. Her keys? What do you mean her keys?

16 **Q. Did she have a key to any vehicle or a key to**
17 **any of her properties?**

18 A. She had handfuls of keys for stuff.

19 **Q. Do you know if those handful of keys were still**
20 **at her house when she went missing?**

21 A. Yes. Whatever was in her purse was still in
22 her purse. She would have three or four different key
23 rings and they all had -- we knew the key ring. She had
24 one with a horse on it and then one was like "friends
25 are" -- so those were all still there.

1 **Q. What about her phone? Was that in her purse as**
2 **well?**

3 A. No. And this kind of bothered me. Typically
4 she would charge her phone in the kitchen where her
5 charger was. But Harper said her phone was at the
6 house. Harper said her phone was on the nightstand in
7 the master bedroom charging and he noticed it was turned
8 off.

9 I know she was notorious for letting her phone
10 die or not checking her phone enough. We had numerous
11 discussions on her phone just before her disappearance.
12 We were trying to delete some programs on there and to
13 transfer all of her photos that she had for her case
14 against her children onto a thumb drive.

15 She didn't have -- she was trying to download
16 Airbnb on her phone, but she didn't have enough space.
17 So she was going to -- she wanted to keep the phone but
18 she was having problems with it.

19 So Harper said it was in the bedroom on the
20 nightstand turned off. When I got there, it was on the
21 kitchen table but not charging. Just there.

22 **Q. So when you say Harper said, are you kind of**
23 **giving that caveat because he was the first one that**
24 **searched the house?**

25 A. Well, he told me he was looking for her and

1 couldn't find her, was calling her the night before and
2 she wasn't answering the telephone and that he found her
3 phone later sitting on the nightstand.

4 **Q. And so he had moved it to a different part of**
5 **the house?**

6 A. By the time I got there, yes.

7 **Q. The search that you are describing that you and**
8 **these other 20 people engaged in, was that before or**
9 **after the police searched the house?**

10 A. Before.

11 **Q. Approximately how much later after your search**
12 **did the police come and search the house?**

13 A. When I got to the house on that Sunday, I
14 called the police myself. Harper said he had already
15 called the police. I wanted to know why they weren't
16 there yet. I was kind of dumbfounded that nobody showed
17 up at all on Sunday.

18 So I ended up talking to Ronnie Imel. He was
19 friends with the -- he was friends with the captain,
20 with the sheriff's department. And he gave me the phone
21 number. And I called him.

22 And I said, I don't understand why nobody is
23 coming up here. Why are the police not here? Why are
24 they not searching? You know, the longer we wait -- I
25 mean, I don't get it. Why would somebody not show up?

1 So he said, Call back in the morning and talk
2 to them in the morning. I will make a phone call.

3 And I said okay. So the next morning I called
4 again. And I said, Can someone tell me when someone
5 will be here, please? I have people searching. The
6 longer she's not being found, something could have
7 happened to her.

8 So they finally sent somebody to come out to
9 the house. One person. And he sat there for a good ten
10 hours before any police showed up. And I believe that
11 was late Monday night.

12 **Q. It sounds like you were a little frustrated for**
13 **how long it took the police to get there; is that fair**
14 **to say?**

15 A. Very frustrated. And the fact they never
16 interviewed anybody.

17 **Q. So the first time you went to the Bonita Vista**
18 **property after Ms. Abrams was missing, was Mr. Harper**
19 **there at the time you arrived?**

20 A. Yes. I arrived with Ronnie Imel and Sally, his
21 wife, was behind me. And Julie, Harper, and then Julia
22 showed up later. Clinton was not there. He had left.
23 He had not come back. And then people from the Zen --
24 there is a Zen camp behind Dia that she was really good
25 friends with. All of them came down to search. Julie

1 knows them. I don't know them very well.

2 Q. When you say Julia, I think you are contrasting
3 to Julie Stanford. But who is Julia? What is her last
4 name?

5 A. Mallory.

6 Q. Were there ever any alarms that went off at the
7 house or any of the vehicles when all these searches
8 were happening?

9 A. You mean not physical alarms?

10 Q. Yeah. Like, an alarm that makes a noise.

11 A. No, there were no alarms. Dia was having
12 problems with the alarm company. They would not give
13 her her password to her visual system without her paying
14 another \$3,000. And she's, like, I don't have \$3,000.
15 And so something to do with a password to be able to get
16 on to hook everything up. So she wanted to do that.

17 After her disappearance, I think a month later,
18 I went out to buy a new console to try to hook it up,
19 but I don't think it ever got up.

20 Q. So she had some sort of surveillance system at
21 the time she went missing?

22 A. It was an old system. But I don't ever recall
23 it ever working. I know that there were a lot of
24 problems with it. Julie or Julia might know more.

25 Q. You never saw any footage or had access to any

1 **footage from video surveillance at the house?**

2 A. No. I didn't know anything about where the
3 system was until after. And that's when we noticed it
4 was in the bedroom, the master bedroom of the big house
5 of Bonita Vista.

6 **Q. Those vehicles that got searched, I think you**
7 **said Ms. Abrams' vehicle and Mr. Harper's vehicle. Can**
8 **we just go through that? Can you tell me which vehicles**
9 **that belonged to Ms. Abrams did you search?**

10 A. I personally did not search them, but I made
11 sure that they were searched. So there was the gold
12 Lexus SUV that's been broken down in the back driveway,
13 her truck. But, of course, they are just looking for
14 her. So just opening doors, is she there or not there.

15 Keith Harper's -- what kind of -- Hummer. He
16 had a Hummer that was being worked on. So that was not
17 drivable. I believe he had a red broken down Jeep. I
18 call it broken down, but it still runs. That was in the
19 driveway, I believe. But his drivable RV, the ones you
20 can drive in it.

21 **Q. And that one got searched too, the RV?**

22 A. Yes. Yes. And I know that Ronnie Imel
23 personally searched that one.

24 **Q. Is that the same RV that Harper, then, at some**
25 **point drove when he left the state of California?**

1 A. That is correct.

2 Q. Do you know why he left?

3 A. He told me he was going to have to leave. He
4 told me it was a visitation for probation. I know that
5 he was on probation of sorts through Dia involving a
6 female that was touched on inappropriately. Don't know
7 if it happened or didn't happen. Not my business. But
8 from what I understand, he told me about a skiing
9 incident with this female and then he had to check in
10 with his probation officer.

11 Q. Did he say where he had to go?

12 A. I can't be a hundred percent sure, but I want
13 to say it was Arizona.

14 Q. Okay. Do you know approximately how long he
15 was gone?

16 A. I don't recall exactly. I'm thinking about
17 five days.

18 Q. Going back to this search, did anyone, to your
19 knowledge, report finding any signs of forced entry,
20 like a broken door or window or anything like that?

21 A. There was none of that.

22 Q. Did anyone, to your knowledge, report finding
23 any blood or blood drops?

24 A. None.

25 Q. Do you have any reason to believe there was

1 **some sort of foul play involved in Ms. Abrams'**
2 **disappearance?**

3 A. That's been the million-dollar question, I
4 think, for all of us only because it doesn't make sense
5 that any money, credit cards, and driver's license, if
6 she would have left, she would have taken those items.
7 Even if she would have walked out, you would have taken
8 those items, especially cash, you know.

9 But, most importantly, she would have taken
10 Ruby. So we knew something was wrong because she would
11 never have left Ruby for anything. Period. I just -- I
12 don't know. I wouldn't say foul play or if she got hurt
13 somewhere while hiking.

14 Or I know that there were some goings on with
15 her neighbors who were illegal growers on the other side
16 of the mountain. And she had a verbal altercation with
17 them two or three weeks prior. And we all yelled at her
18 because she took it upon herself to go over there and to
19 tell them off about using -- they had a hose coming down
20 to her creek to siphon water up, and she took it out of
21 the creek and went up there and told them off. And we
22 told her, Don't go anywhere like that again, especially
23 alone. So she promised she wouldn't do that.

24 **Q. I'm sorry, who were those people?**

25 A. They were -- we don't know. We just know that

1 they were illegal growers on the other side of the hill.
2 And if you walk all the way over there, you can see the
3 grow. And we told the police about the grow and her
4 altercation with them.

5 **Q. Do you know if the people -- sorry.**

6 **Do you know if those people were the owners of**
7 **the property?**

8 **A. Don't know.**

9 **Q. Not sure one way or another?**

10 **A. No.**

11 **Q. Okay. When Ms. Abrams would typically go for**
12 **hikes, do you know if she would carry her cell phone**
13 **with her?**

14 **A. I do not know personally. I know that cell**
15 **phones don't work well up there, so I don't see why she**
16 **would have. However, she did take that picture of the**
17 **rattlesnake she killed with a shotgun while she was out**
18 **on a walk. So, you know, she could have, on occasion,**
19 **taken it for picture's sake. But there was no way she**
20 **would get reception.**

21 **Q. Were you able to locate any jewelry after she**
22 **went missing?**

23 **A. Locate jewelry, no. There was --**

24 **Q. Did you sell any jewelry in connection with the**
25 **garage sale?**

1 A. No. Absolutely not.

2 Q. Did you ever see a gold ring at her house after
3 she went missing?

4 A. Yes. There was a man's gold ring in the car in
5 the ashtray.

6 Q. Whose car?

7 A. I'm sorry, Dia's truck.

8 Q. When you say "man's gold ring," you are
9 deducing that based on what? The size of it?

10 A. The size of it looked kind of manly.

11 Q. Do you know what happened with that gold ring?

12 A. Keith Harper had it.

13 Q. Did you -- sorry. Go ahead.

14 A. There was jewelry in the house. I believe in
15 the safe. But there was a small box put aside. It was
16 in the kitchen. And Clinton was there. And he said,
17 This is some of the jewelry that my mom was going to
18 give Crisara. And I'm like okay. And he asked if he
19 can take it with him.

20 And Harper said, Well, I don't believe why not.
21 And he looked at me. He goes, What do you think?

22 I said, I don't believe we have the right to
23 dispose of any of her things such as this, personal
24 items, without her consent. And I said, It's still too
25 early in this to release any of that.

1 So they put it up in the upper cabinet where
2 the coffee is, up on the top shelf. And we told them,
3 This is where it's going to stay. And we allowed him to
4 take pictures of it. But --

5 **Q. Allowed Clinton to take pictures?**

6 A. That is correct.

7 **Q. How many --**

8 A. Just showing what was there.

9 **Q. Sorry. I didn't mean to jump in.**

10 **How many safes did she have?**

11 A. She had two big safes in -- I don't know what
12 kind of room that you would -- kind of like a mudroom.
13 And then she had a small one in her bedroom.

14 **Q. The two in the mudroom, do you know if**
15 **Mr. Harper or anyone was able to access them after she**
16 **went missing?**

17 A. Yes. Harper had the codes for both safes. And
18 the one upstairs. Yeah.

19 **Q. Did you ever see the inside of any of those**
20 **safes after Ms. Abrams went missing?**

21 A. Yes.

22 **Q. Did you see the inside of all three of them?**

23 A. Yes.

24 **Q. Let's start with the small one in the bedroom.**
25 **When did you see the inside of that one after she went**

1 **missing?**

2 A. The same day that I responded. So it would
3 have been the next day.

4 **Q. So this is the day of the search?**

5 A. Yes.

6 **Q. Okay. What do you recall seeing in that small
7 safe, if anything?**

8 A. I just remember papers. It was just a small
9 little stack of papers. We didn't take anything out of
10 anything. Just a look.

11 **Q. What about the other two in the mudroom, when's
12 the first time you saw the inside of those?**

13 A. Maybe a month or two later.

14 **Q. What was the occasion?**

15 A. Keith Harper wanted me to know where the safe
16 codes were for emergency, if something happened to him,
17 and showed me the contents and had me open them so I
18 knew how to do the dials.

19 **Q. What do you recall seeing in those safes? And
20 feel free to break it down, if you want.**

21 A. I didn't go looking through. I just saw,
22 visually, guns, a lot of guns. Harper said a few were
23 his and the rest were hers. Little boxes. I don't know
24 what was in them.

25 **Q. You didn't open the boxes?**

1 A. Oh, no, sir.

2 Q. Did you ever make any effort to inventory the
3 contents of either of those safes?

4 A. No, sir. No.

5 Q. Do you know if Mr. Harper did?

6 A. I do not know.

7 Q. Were -- those two big ones, were they primarily
8 gun safes; is that fair to say?

9 A. Yes, sir. Yes, sir.

10 Q. Did you ever make any effort to inventory any
11 of Ms. Abrams' assets after she passed?

12 A. No, sir. It would take a miracle.

13 Q. You didn't do any sort of inventory in
14 connection with that garage sale?

15 A. The garage sale, no. I just made sure they
16 were the items from her previous garage sale that she
17 had at my house. They were, like, little Christmas
18 ornaments, place mats, things that didn't get sold at
19 the last one. And then some other ones that she had
20 added. Some shirts -- some old shirts and some old
21 towels and bath mats. They had been well used. So that
22 was the extent of the items that she had put aside for
23 the garage sale.

24 Q. Did you sell any art at that garage sale?

25 A. Not unless she put it aside for something.

1 Trying to even think. She had a couple of picture
2 frames, inexpensive picture frames from T.J.Maxx.

3 **Q. Okay. Let's shift gears and talk about**
4 **Mr. Harper. Can you tell me when is the first time that**
5 **you actually met Keith Harper?**

6 A. Let's see, I knew of him, but I want to say the
7 first time I met him is when she had surgery. And I had
8 to take care of Ruby. And that's when she gave me
9 Harper's number, so I can drop Ruby off with her. I got
10 to the gate and the gate was closed. Ruby jumped out
11 and ran underneath. And I was like (descriptive sound).
12 She wasn't a dog to be on the leash. So I had to go all
13 the way around the fence line, and I jogged to keep up
14 with her. And Harper was outside working on Dia's
15 truck, on the engine, because it was an old truck.

16 And Ruby seemed to know him. He introduced
17 himself, and he said Dia was inside with a migraine
18 because she got a lot of migraines. And I said, okay,
19 if she's good, tell her to call me if she needs me. And
20 that was it.

21 The second time --

22 **Q. Before you go to the second time, can you tell**
23 **me approximately when that was, the first time?**

24 A. I want to say -- I want to say 2019 -- she
25 disappeared in 2020. Probably fall of 2019.

1 Q. So whenever she had this surgery, it would have
2 been right around that same time; is that right?

3 A. Yes.

4 Q. What was the surgery?

5 A. I think it was cosmetic surgery. She was a
6 very private person when it came to that.

7 Q. Okay. And then because she was having surgery,
8 she had asked that you help take care of Ruby; is that
9 right?

10 A. Yes.

11 Q. Do you know why -- did she say why she didn't
12 just have Mr. Harper take care of Ruby?

13 A. He was not in town yet.

14 Q. Do you know where he was?

15 A. I believe he was coming in from Colorado.

16 Q. Okay. You were about to tell me about another
17 time that you -- maybe the second time that you met
18 Mr. Harper.

19 A. Yes. I think I only met him three times. The
20 second time was when we went to eat Mexican food, me and
21 Julie Stanford and Dia and Harper, up in Idyllwild.
22 That was sometime after that.

23 And the third time was when we had a girls
24 night and we were going to take country dance lessons,
25 and she asked if Harper can come with us. And that was

1 in December. I might be confused on the dinner. The
2 dinner, Mexican food, could be after that. But I
3 remember the country dancing was around December, that
4 he came with us, and then we went to dinner after that.
5 There was about six of us.

6 **Q. And before Ms. Abrams went missing, you had**
7 **only seen Keith Harper in person on three occasions?**

8 A. Yes.

9 **Q. Had you ever talked to him on the phone?**

10 A. I don't believe I spoke with him on the day I
11 had to return Ruby. I don't believe I spoke with him or
12 texted him. I think she just said, Well, Harper is
13 here; you can drop her off with him.

14 So I spoke with her, not him. But I had his
15 number in case of an emergency. So the first time I
16 actually talked to him would have been the morning after
17 her disappearance.

18 **Q. So your only real connections to Mr. Harper**
19 **before Ms. Abrams went missing was this happened to be**
20 **someone that was around her when you were getting**
21 **together with her; is that fair to say?**

22 A. I know that she was seeing him. She -- she's
23 dated, you know, a few people. But I know that he has
24 been very close with her. And she used to talk about
25 him a lot, and he would help her all the time. And he

1 would help out at the ranch all the time. She would
2 tell me whenever -- oh, I did speak to them on the phone
3 together once. That was in March. That was in March.

4 **Q. Of 2020?**

5 A. Yes. I was helping her with the Airbnb
6 situation. She could not download Airbnb on her phone.
7 So every time she would get a message from a new renter,
8 it would go to her e-mail. And she would ask me to
9 respond. So I would sign into her account to respond
10 for her so she could see the convo. She went home to
11 tell Harper, and Harper asked if I can help him get his
12 properties on Airbnb. So I was on the phone with Harper
13 and Dia on Dia's phone. They called me from Bonita
14 Vista.

15 **Q. So Harper had some properties on his own that**
16 **he wanted to list on Airbnb?**

17 A. Yes.

18 **Q. Did he tell you where the properties were?**

19 A. Colorado. He only spoke about the Colorado
20 house.

21 **Q. Did you ultimately help him list the Colorado**
22 **house on Airbnb?**

23 A. No.

24 **Q. How did Ms. Abrams hold him out to you? Did**
25 **she say the word "boyfriend"? Did she say "fiance"?**

1 **Anything like that? Did she give a label?**

2 A. She never labeled anyone. He was a really good
3 friend. We know that there was a sexual relationship, I
4 mean, because that would be discussed amongst women.
5 You know, there was also another young gentleman that
6 she would see just for, you know, physical needs.

7 **Q. Around that same time period? Like, you are**
8 **talking about the first half of 2020?**

9 A. Yes. Yes.

10 **Q. Who was the other gentleman?**

11 A. That I do not know. I just know that he was
12 younger and he was a fireman.

13 **Q. Do you know if he was local?**

14 A. I -- yes. In California. Yes. She was very
15 private about that information.

16 **Q. And you never met that person?**

17 A. Oh, no. Usually she would not introduce. But
18 she introduced Harper to the Imels, Ronnie and Sally
19 Imel. They've known -- as I said, they have known her
20 for 20-something years. And she did introduce him at
21 that time.

22 I did ask her once. I said, Well, is he, like,
23 your boyfriend or something?

24 And she goes, Well, yeah, you can say that.

25 And I said okay. She never really -- he was

1 there a lot. He was always visiting. She was looking
2 forward to the visits.

3 **Q. Yeah, so were they living together at the time**
4 **that she went missing?**

5 A. He was there all the time pretty much living
6 back and forth. Yes.

7 **Q. Okay. Did he maintain a separate residence of**
8 **his own around that same time?**

9 A. From what I understand, he did because he could
10 not be a resident of California or be here for more than
11 a few days at a time, which is why he constantly left.
12 With his probation, he had this residence elsewhere. He
13 would come to California for a couple days and then
14 leave to go back to that other residence until the
15 probation was over.

16 **Q. Okay. And that's the same probation that you**
17 **were talking about earlier where he had to leave in the**
18 **RV after Ms. Abrams went missing?**

19 A. Yes, sir.

20 **Q. And you gave us your understanding of what that**
21 **probation was for. I want to ask you, setting that**
22 **aside, whatever that incident was with the alleged**
23 **inappropriate touching, are you aware of any other**
24 **criminal history that Mr. Harper may have?**

25 A. I never discussed any of that with him or her.

1 Q. And you don't have any information separate and
2 apart from discussions?

3 A. No.

4 Q. Do you know if he's required to register as a
5 sex offender?

6 A. I do not know.

7 Q. You never had any conversations with him about
8 that topic?

9 A. I did with Dia. She said he was considered a
10 sex offender. But she knew the whole story. And it's
11 just one of those things you don't pry. And she's,
12 again, being very private. So it's only what she wanted
13 to share. But she did share that.

14 Q. What did she tell you about that?

15 A. That it was for the inappropriate touching of
16 that female.

17 Q. But it sounds like she expressed to you that
18 she did not have concerns about that; is that right?

19 A. Correct. She was fine with it.

20 Q. What was your reaction?

21 A. I don't judge people. It's too easy to do. I
22 have had my own problems with that. As long as she
23 knew. Like, you know, are you okay with it? As long as
24 you know the story and you are comfortable with it, then
25 we are fine, you know.

1 Q. Did you express any concerns to her at all over
2 the fact that she was getting together with a sex
3 offender?

4 A. No. I didn't find out about it until much
5 later anyways. It was probably March or something like
6 that at the time when she was at my house. So it was
7 towards the later part of -- before she disappeared.
8 There wasn't a whole lot of time at that point.

9 Q. Yeah, so I get that it was later. But at some
10 point, you learned about the sex offender issue. I'm
11 just trying to understand, you never went to your friend
12 Dia and said, hey, are you sure you want to be involved
13 with a guy that's supposed to be a registered sex
14 offender?

15 A. No. She had said that he was a sex offender,
16 but I didn't know about any type of registry. You know,
17 that this woman -- he -- that the case was a sex offense
18 in another state with a woman and that it was -- his
19 hand slipped touching her breast is what that whole case
20 was about.

21 Q. Do you know if Mr. Harper did any work on any
22 of Ms. Abrams' properties before she went missing?

23 A. He maintained it. You know, he would help with
24 mowing, scooping up, you know, the animal pens. She
25 moved her -- she had, like, a barbecue grotto at the

1 Garner Valley house, and she wanted it moved to Bonita
2 Vista. So he took that apart for her and brought it to
3 Bonita Vista and was putting it up there for her before
4 she disappeared because she wanted it there in case she
5 lost the Garner Valley house.

6 She wanted the barn. And I told her that would
7 be easy to move. So we were making plans to take that
8 down and then move it to Bonita Vista. But that had not
9 started yet. Whenever things got broken or something
10 wasn't working right, he would always fix it.

11 **Q. Do you know if Ms. Abrams and Mr. Harper ever**
12 **had any dispute or argument over anything?**

13 A. No. She never discussed that.

14 **Q. And you don't recall there being any periods of**
15 **estrangement or anything like that between the two of**
16 **them?**

17 A. No. Don't recall any of that.

18 **Q. What's your understanding of Ms. Abrams'**
19 **relationship with her children before she went missing?**

20 A. That was the biggest topic of discussion that
21 we would always have because that was something we had
22 in common. She said that she did not have a
23 relationship with her children, that she divorced their
24 dad because dad would give in to the kids, and it added
25 to, you know, Clinton's drug problem, you know, by

1 giving him all this money. But she really didn't have a
2 relationship with Crisara, that she's just different.

3 She's tried meeting them on numerous occasions.
4 She would go down to San Diego to do some consignment
5 stuff or to meet with attorneys. She would try to meet
6 for lunch with them and they would blow her off, and
7 that would really just break her heart. She didn't
8 understand why they never had time for her.

9 There were numerous times that Clinton was
10 supposed to come to Bonita Vista or Garner Valley and he
11 just wouldn't show up. She -- I know for the last -- I
12 want to say eight months, she was just distraught with
13 her children. You know, they made her cry. She didn't
14 understand.

15 They wanted -- the biggest thing with her
16 towards the end was Clinton wanted her to return her
17 pickup truck. It's an old pickup truck. Probably
18 wouldn't be worth two grand. And it was her only mode
19 of transportation. And she had an attorney. Her name
20 is Tara Burd. And every time she had a meeting with the
21 kids, it caused her a lot of -- it just really stressed
22 her out.

23 So the plan was for me to go with her to the
24 next one to be her support and to be strong for her.
25 She -- I think at one of the last conversations, she

1 like, you know, they keep wanting the truck, they keep
2 wanting the truck because it's part of the -- of Clem's
3 trust.

4 And I said, Well, they can sign that over to
5 you. It's not worth anything, you know.

6 She goes, I don't understand why they are --
7 why they would let their mother not have a mode of
8 transportation. That's the only thing I have. Why are
9 they going to take it from me? They are going to show
10 up to the house and take it. I know they are going to
11 do that.

12 And she was upset thinking that they were going
13 to come to the house and take this truck. So she called
14 me and told me that Tara Burd told her she had to turn
15 the truck over. And I said -- you know, and that she
16 had to drive it to San Diego.

17 I said, You don't have to do any such thing. I
18 said, So you are supposed to drive to San Diego and not
19 have a ride back? You know, if they want the truck,
20 they can come pick it up at your house. We will find a
21 way to get you a vehicle to drive.

22 She goes, But it's my truck. I put work into
23 it, a new transmission into it. It's not worth
24 anything. They have billions of dollars, and I just
25 want my truck.

1 So that was a big contention when they did come
2 to take the truck. She was upset with them because they
3 stopped paying any of the bills. I guess Clem paid
4 these bills at the house -- at all the houses. And that
5 kind of stopped even though she was supposed to get
6 money from the trust to help pay the bills. So nothing
7 got paid in all that time frame. So she was really
8 frustrated.

9 **Q. Okay.**

10 A. She was done with them. She says, I'm done
11 with them. And that was in November of 2019.

12 **Q. Okay. You mentioned that they made her cry.**
13 **Do you remember any specific occasion when that**
14 **happened?**

15 A. Just whenever she would come back after having
16 meetings with the attorneys in regards to the ongoing
17 lawsuit or whatever that was between, you know, Clem's
18 trust and her.

19 **Q. In the last year of her life -- or last year**
20 **before she went missing, do you know how often she was**
21 **communicating with Crisara?**

22 A. I know that she rarely spoke to Crisara. She
23 spoke to Clinton more. But she would call and leave
24 messages and they wouldn't call back. And again, every
25 time she went down to San Diego, which was almost once a

1 week, they didn't seem to have time for her. So she did
2 not have a relationship with Crisara as long as I knew
3 her.

4 Q. When you say she spoke with Clinton more, do
5 you know how frequently she spoke with him the year
6 before she went missing?

7 A. Very little. I know when we were cleaning up
8 her garage, she said, Well, I called Clinton to ask him
9 to come get his furniture that he left here.

10 I think it was a trunk. Then he was supposed
11 to come up, but then he never showed up. And that was
12 days ago. So I think -- I could only guess. But it
13 wasn't a weekly thing.

14 Q. All right. Let's talk about Ms. Abrams' estate
15 plan. Did you ever talk to her about what she wanted to
16 do with her will or trust or anything like that?

17 A. Yes.

18 Q. Okay. How many conversations did you have with
19 her that you can recall on that topic?

20 A. I don't know. She would always bring up what
21 she wanted. But after the -- before she did the will
22 because she had been -- in 2019, she was talking about
23 changing the will, that she wanted to remove the kids
24 from the will.

25 And she said, If anything happens to me,

1 Clinton did it.

2 And I'm like, What?

3 And she would bring up his Mafia connections
4 and that kind of thing. She goes, Just look at him;
5 he's the one that did it.

6 I'm like okay. And then --

7 **Q. When did she tell you that? In 2019?**

8 A. 2019, yeah. There was a lot of people she told
9 that.

10 **Q. That was one time?**

11 A. Oh, no. Quite a bit. Quite a bit.

12 **Q. How many times did she tell you that?**

13 A. Well, every couple of conversations. Because
14 she was always talking about Clem's trust and not having
15 support and living off of social security; how the kids
16 haven't given her one, you know, moment of their time;
17 they can't be spared to come visit with her or to have
18 lunch with her; that she was done with them; that the
19 only time they wanted to talk to her was if they needed
20 money. And so she kept saying, I need to redo my will;
21 I need to redo my will.

22 And I said, Just go to Legal Zoom. You know,
23 that's what I did. But, of course, I didn't know any of
24 her financials or anything. I just kind of threw it out
25 there, said you can do it yourself.

1 And she goes, Yeah, I need to get that done.
2 I've got a lot of stuff to do but I need to get that
3 done; I need to get that done.

4 So -- but she was adamant that if something
5 happened to her, that Clinton did it, and that neither
6 she did not want either Crisara or Clinton to come into
7 the house because they would start taking things from
8 the house.

9 **Q. Okay. What --**

10 A. She said, Don't let them in the house.

11 **Q. You mentioned Mafia connections. What's your**
12 **understanding of Mafia connections?**

13 A. She -- she said that Clem had these connections
14 and so it's the San Diego Mafia. I never had any
15 run-ins with the Mafia so I'm not familiar with any of
16 that. She said that Clinton also and that he's been in
17 and out of rehab and that he has connections also and
18 that he has always had these guys with him wherever he
19 went.

20 **Q. And her understanding was -- as relayed to you**
21 **was that these guys were part of some sort of Mafia?**

22 A. Yes.

23 **Q. Okay.**

24 A. And then the day after she disappeared, he
25 showed up to the house with some pretty big burly guys

1 also. And it was very odd. People made comments on it.
2 They never talked to anyone. They didn't search. They
3 didn't talk to him. It was a really weird circumstance.

4 But she was adamant about the kids not
5 receiving anything for the way that she was treated, and
6 she would like the Bonita Vista property to be turned
7 into an animal refuge.

8 **Q. When did she tell you about this animal refuge**
9 **idea? Also 2019?**

10 A. Oh, yeah. She had been talking about that for
11 quite a while, that she wanted to do that, and bring in
12 other animals, just like all of her dogs were rescues.

13 **Q. Did she ever mention to you a desire to leave**
14 **any assets to Keith Harper upon her death?**

15 A. We didn't discuss that. We didn't discuss who
16 would benefit or not benefit. Just that she would love
17 to have, you know, an animal rescue there.

18 **Q. So she never told you who her desired**
19 **beneficiaries would be under her estate plan?**

20 A. No.

21 **Q. Did she ever tell you who she wanted to be her**
22 **trustee?**

23 A. She called me to ask me if I would be. And
24 this was via telephone. She goes, I asked Keith Harper
25 if he would, and he said no. But I'm going to try to

1 talk him into it. But if he doesn't do it, would you do
2 it?

3 And I was like, I thought we were friends? Why
4 would you do that to me? You know, I'm like, Okay,
5 well, this is not going to be needed for 25 years or so.
6 So whatever you need, I'm there for you.

7 She goes, Okay. Great. Thanks.

8 So I didn't hear anything more for about a week
9 or so about that. And then she met me at the Garner
10 Valley house to meet with the renters that were going to
11 be checking in. And she told me that she got her will
12 done and she named me as a trustee or something.

13 **Q. She told you that during that final time that**
14 **you saw her at the Garner Valley property?**

15 A. It was before that.

16 **Q. Okay. But it would have been close in time to**
17 **when she went missing?**

18 A. Well, I guess she -- it was probably within a
19 month and a half because we started renting that out.
20 We were supposed to rent it out in February. We rented
21 it out in March. And then she wanted to take care of
22 her phone. So I had all of her passwords to everything
23 to help her do that. Then she told me about the animal
24 sanctuary again and Clinton.

25 And then she probably -- probably -- she

1 probably told me at the end of April, beginning of May,
2 I want to say. So it was several weeks before she went
3 missing.

4 **Q. She told you that she had already updated her**
5 **estate plan documents at that time?**

6 A. Yes. Yes. Because she was looking for an
7 attorney, and she -- I had an attorney friend, and I
8 said, Hey, do you know anybody that does trusts and
9 stuff like that in Palm Desert?

10 And he gave me a name, and I sent it to her.
11 She goes, Oh, I found one through Athena. Athena is a
12 resident in Garner Valley. So she went through that
13 Bunco friend to get a name of an attorney.

14 **Q. Do you know Athena's last name?**

15 A. I think it's Geges, G-E-G-E-S, I think.

16 **Q. Do you know if that Bunco friend Athena --**
17 **well, let me withdraw that.**

18 **Do you know who that friend recommended?**

19 A. No. No.

20 **Q. Who did you recommend?**

21 A. I have no idea.

22 **Q. Someone other than Dennis Healey?**

23 A. Yes. I didn't know Dennis. In fact, I didn't
24 know anybody down there. I think it was a -- oh, the
25 attorney friend -- it was actually a guy that lives in

1 Garner Valley, and he was an attorney. And I forgot --
2 I thought he did wills and trusts. So I called him, and
3 I don't -- I don't think it went anywhere from there. I
4 think I might have told her to give him a call, that
5 resident.

6 **Q. Do you remember that person's name?**

7 A. He was on the board for a while. I could find
8 out. I don't recall it off the top of my head.

9 **Q. That's okay.**

10 **Do you know if Ms. Abrams ever spoke with that**
11 **person?**

12 A. I don't believe she did because when I was
13 talking to her about calling that guy, she said that
14 Athena gave her a name.

15 **Q. So by the time you gave her the recommendation,**
16 **Ms. Abrams had already gone another direction; is that**
17 **right?**

18 A. Yes.

19 **Q. Were you involved in any way in Ms. Abrams**
20 **hiring Dennis Healey as her estate planning attorney?**

21 A. I didn't know anything about Dennis Healey. In
22 fact, even after her disappearance, I still didn't know
23 who her attorney was.

24 **Q. Do you know if Mr. Harper had any involvement**
25 **in referring Ms. Abrams to Dennis Healey?**

1 A. I don't believe he did. No. I believe it was
2 Athena.

3 Q. Did you ever see any trusts, will, or other
4 estate planning document of Ms. Abrams before she went
5 missing?

6 A. I saw her handwritten notes crossing off all
7 the kids' names.

8 Q. When did you see that?

9 A. Oh, that's been on her kitchen table probably
10 about -- early in 2020.

11 Q. Let me show you a document that I will mark as
12 Exhibit 1, see if it's this document that you are
13 referring to.

14 So, Ms. Fedder, I will mark as Exhibit 1
15 your -- a document that is 27 pages long. It's entitled
16 "Trust Agreement of Dia Kenshalo Abrams," and I will
17 just flip to the back just so I can show you the date.

18 (Exhibit 1 marked for identification.)

19 THE WITNESS: Yeah, that's one of them. And
20 the other one was a handwritten one.

21 BY MR. OWENS:

22 Q. I have a date here of December 16, 2016. Okay.
23 And then I'm going to go back to the front. I'll go to
24 page 2. And if you look down towards the bottom, there
25 is some text that's crossed out and some handwriting

1 there.

2 Do you see that?

3 A. Yeah.

4 Q. Is that what you were referring to earlier that
5 she had written through?

6 A. That's one of them, yeah. But she also had a
7 handwritten -- like, in her own handwriting.

8 Q. Okay. That was not on, like, a preprinted
9 form, right?

10 A. No, sir. No, sir. This one doesn't have as
11 many cross-outs.

12 Q. Well, there is some more.

13 A. Oh, okay.

14 Q. I will show them to you. I'm just starting
15 with this page.

16 So here on page 2 of Exhibit 1, the trust
17 document, the handwriting that we see near the bottom,
18 are you able to tell whether you recognize that
19 handwriting as the handwriting of Ms. Abrams?

20 A. Yeah, that's Dia's.

21 Q. Do you know what -- and I can zoom in here too.
22 Do you know what is written above the
23 cross-through there?

24 A. Yeah, those are her initials.

25 Q. Okay. Let's go to -- now I'm on page 4. And

1 there is more handwriting there at the bottom.

2 Does that appear to also be Ms. Abrams'
3 handwriting to you?

4 A. Yes.

5 Q. Okay. Now I'm on page 5. About a quarter of
6 the way down the document, there is some handwriting.
7 Do you recognize that handwriting?

8 A. Yes.

9 Q. Do you believe that to be Ms. Abrams'
10 handwriting?

11 A. Yes, I do.

12 Q. Okay. So when you were testifying earlier
13 about a document or documents, is it fair to say that
14 this could have been one of them but you also recall
15 seeing more handwriting from her?

16 A. The other one was handwritten and also had
17 cross-throughs. So I don't know if that was her
18 original one that she brought in to have that one done
19 in 2018 or if she wrote it afterwards. I don't know.
20 But I just know that she had red pen on the handwritten
21 ones.

22 Q. Did she ever tell you why she was crossing out
23 her children from the -- her documents?

24 A. She was livid with them. She's like, I don't
25 want to have -- they are not getting anything from me;

1 they didn't want to have me in their life so they don't
2 get anything from me in my life.

3 Q. Let me just go back real quick and ask you one
4 more thing.

5 So going back to Exhibit 1, doesn't really
6 matter which page, but I will just go with page 4 here,
7 it looks like there is a date written in, December 12,
8 2018.

9 Do you see that?

10 A. Yes.

11 Q. Do you believe that to be the date that she
12 actually crossed these items through?

13 A. I have no reason to believe it was not done on
14 that day. I saw them in 2019 on her kitchen --
15 beginning of 2020 on her kitchen table.

16 Q. So when you saw the cross-through -- well, let
17 me withdraw that.

18 Does December 12, 2018, have any particular
19 significance to you in terms of events that may have
20 occurred in Ms. Abrams' life?

21 A. The only thing I can think of is that's when
22 Clem died. I know that Clem was in the hospital, and
23 she went down there for that. And I checked on the
24 animals and stuff for her in Garner Valley because
25 Isidro checked on the other one. I think that's about

1 the time Clem died, but that's the only thing I can
2 think of.

3 Q. When Ms. Abrams showed you the documents on the
4 kitchen table in 2020, did she say one way or the other
5 whether she had recently written on those documents?

6 A. No. No.

7 Q. I'm just trying to figure out -- and if you
8 don't know, you don't know. And that's perfectly fine.
9 But I'm just trying to figure out if, perhaps, she
10 actually wrote on the documents later and then sort of
11 backdated the December 2018 date. But it sounds like
12 you don't have any information on when she actually
13 wrote on the document; is that right?

14 A. Right. It would not be in her character to
15 backdate anything. It's just not. She would have done
16 it -- if she was mad, she would have done it right there
17 and then.

18 Q. The Isidro that you mentioned a couple times,
19 is that Isidro Garcia?

20 A. Yes, sir.

21 Q. Do you know a person named Victor Valentino?

22 A. No. Never heard of him.

23 Q. And you weren't present when Ms. Abrams signed
24 any of her estate plan documents?

25 A. No.

1 **Q. Were you surprised at all when Ms. Abrams**
2 **expressed to you that she wanted you to be her alternate**
3 **trustee?**

4 A. Well, yes and no, because I know that there
5 were people that were closer to her. But whenever she
6 needed something to get done, I was her go-to person.
7 She knew I could -- having gone through it with my late
8 husband and dealing with court systems and stuff, she
9 thought I would be the better person to handle it over
10 Julie. Because Julie is actually, you know, the closer
11 friend, you know. And they loved each other like
12 sisters. Not that Dia and I didn't, but we all kind of
13 knew that would be way too much for Julie to handle.

14 So for her to ask me, I think, it was just for
15 that reason because she knows that I would try to handle
16 things. And if something didn't go her way, that I
17 would argue to get her way.

18 **Q. Did she tell you why she had listed Mr. Harper**
19 **as a primary trustee?**

20 A. No. She did say that she was trying to talk
21 him into it because he didn't want to. So that's when
22 she called me. I remember they were out of town, I
23 think. And I was sitting out in my front patio, and I
24 was looking at the stars, and I remember because I was
25 smoking back then. And she called me and asked if I

1 would be her trustee if Harper said no, but she was
2 going to try to talk him into it.

3 And that's the last I heard until she went to
4 the attorney and told me, I had redid my will; I finally
5 got that done; and I named you. She didn't say anything
6 else.

7 So when I got there on Sunday, Keith said that
8 he and I both were. I didn't know anything because I --
9 she didn't tell me anything more.

10 Q. Did she ever mention to you anything about
11 naming you as an agent under her power of attorney
12 document?

13 A. I don't understand the question.

14 Q. Did she ever talk to you at all about a power
15 of attorney?

16 A. Just that she did a power of attorney with her
17 will -- I mean with her will and trust.

18 Q. Okay. Did she tell you that you had any role
19 with respect to the power of attorney document?

20 A. We never discussed it.

21 Q. You talked about trustee of the trust, but you
22 didn't talk about the power of attorney in terms of who
23 would be the fiduciary for that document; is that right?

24 A. No. She just named -- she just told me, hey, I
25 named you as this. And I'm like, okay. And that was

1 the end of the discussion. I mean, figuring that
2 nothing is going to happen or I would not be needed for
3 20, 25 years. There was no discussion.

4 **Q. After Ms. Abrams went missing, did you ever**
5 **communicate with Dennis Healey at all?**

6 A. Yes. I think I called every attorney in Palm
7 Desert looking for his office, a office that handled
8 Dia's will -- her will. Nobody knew who it was.
9 Apparently, his card was in her wallet. But when
10 Crisara went into the house to do an inventory -- she
11 did an inventory -- video inventory, they said they
12 couldn't find his card in her purse.

13 But after all that and when I finally came back
14 into the house, I finally found her business card after
15 we had located him. But I have -- how many attorneys
16 did I call? I kept track of every attorney that I
17 called. I think there were 15.

18 **Q. Okay.**

19 A. Trying to find who it was.

20 **Q. Okay. So you were just randomly calling**
21 **attorneys trying to find the one that did her plan?**

22 A. Yes. More than 15. I called every office. 1,
23 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17,
24 18, 19, 20, 21, 22, 23, 24, 25 attorneys.

25 Oh, I found the name of the attorney that lived

1 in our neighborhood if you would like that now.

2 **Q. Yeah, that would be great.**

3 A. His name is Brent Lance, L-A-N-C-E.

4 **Q. Okay. How many times have you spoken with**
5 **Mr. Healey?**

6 A. Well, I wasn't allowed to talk to him because
7 I'm not the first. I think I tried to call to get an
8 appointment, but they wouldn't talk to me. So Keith
9 Harper called and talked to him. So I did not talk to
10 him on the phone then. But I did go with Keith Harper
11 to the office. He wanted me to go with him to speak to
12 Mr. Healey.

13 Mr. Healey was like, Well, you are not part of
14 this.

15 And Keith said, Well, I want her in here to
16 take notes and to make sure we are on the same page.

17 I said, Well, he's wanting me to be his
18 assistant to keep him organized.

19 **Q. Do you still have those notes?**

20 A. I don't think there were really any notes. He
21 gave -- Mr. Healey gave him a copy of the trust or the
22 will.

23 **Q. Oh, I thought you were saying you took notes**
24 **during that meeting; is that not accurate?**

25 A. Well, just his information; that if he had any

1 problems or any questions, to give him a call. It was
2 very basic.

3 **Q. How did you find out that Mr. Healey's card was**
4 **at one point in Ms. Abrams' wallet?**

5 A. When I went back over to the house -- when
6 Harper came back. I want to say it was when Harper came
7 back from being out of town. Her purse was still
8 sitting on the chair. And so we were taking inventory
9 of whatever coins or loose bills she had in her purse so
10 I can put it in a ledger to see how much money she had
11 in her purse. And when I opened up her wallet, his card
12 was right there.

13 **Q. Okay.**

14 A. But by then, he had already spoken to
15 Mr. Healey.

16 **Q. So how many times have you had a conversation**
17 **with Dennis Healey?**

18 A. I think it was just that one time. I think I
19 might have called him to ask him a question, but he said
20 he couldn't talk to me. So I said, Okay, Harper, call
21 him and ask him this or something. But that would have
22 been it, one other time if I tried.

23 **Q. So you recall that one in-person meeting. And**
24 **would that have been you, Mr. Healey, and Mr. Harper?**

25 A. Yes, sir.

1 Q. That was at Mr. Healey's office?

2 A. Yes, sir.

3 Q. Was anyone present during that meeting?

4 A. No. It was just the three of us. His
5 secretary came in for something. But she didn't sit in
6 there. She just handed him something or told him he had
7 a call or something.

8 Q. Approximately how long was that meeting?

9 A. Oh, 20 minutes, if that.

10 Q. Do you recall what was discussed?

11 A. No. I really don't. I could only guesstimate
12 that something to do about her accounts or something
13 like that. That's all I can think of.

14 Q. Okay. Let's talk about that -- going back to
15 the surgery that Ms. Abrams had, do you know if she was
16 on any sort of prescription pain medication after that
17 surgery?

18 A. No.

19 Q. You don't know one way or the other?

20 A. No.

21 Q. Okay. Did she ever seem confused or
22 disoriented or anything like that after that surgery?

23 A. No.

24 Q. Did you ever see any signs of any sort of
25 mental decline in her at all?

1 A. None. She didn't even drink.

2 Q. Do you know of any professional service
3 providers that Ms. Abrams may have had other than -- we
4 have already talked about Mr. Healey as the attorney.
5 But do you know of any others?

6 A. No. Well, Tara Burd, her attorney for the
7 lawsuit.

8 Q. What about, like, a CPA, financial advisor, or
9 anything like that?

10 A. No. I didn't find anything on that.

11 Q. In terms of Ms. Abrams' friends, you mentioned
12 Julie Stanford was probably her best friend. Who else
13 would you say were her close friends before she went
14 missing?

15 A. Kim Miller. She lives in Temecula. Julia
16 Mallory. Just because they were neighbors. They talked
17 a lot. But it wasn't like them to, like, go places
18 together because Julia had cancer. So they used to sit
19 and chat for a while. I know she was talking to her
20 Realtor on the Garner Valley house because she was
21 trying to sell it. Star Evans. She started spending a
22 lot of time with Star Evans.

23 Q. You mentioned that she was friends with the
24 Imels; is that right?

25 A. Yeah. They have all known each other for years

1 and years up there on the mountain.

2 Q. Do you know if the Imels have any sort of
3 relationship with Keith Harper?

4 A. No, they don't. They don't like him.

5 Q. They only know Mr. Harper because Ms. Abrams
6 introduced him to them; is that right?

7 A. Yes. Yes. I they think were only introduced
8 once.

9 Q. Did the Imels participate in the search that
10 you were talking about earlier when people --

11 A. Yes.

12 Q. Okay. What was their role in connection with
13 the search?

14 A. Finding Dia any way that they could. They went
15 to every building, every vehicle. They searched
16 everywhere, around the house as much as possible. Every
17 crevice, around waterways, in the creeks. I went around
18 on the ATV. I tried to go up the hill, but I was
19 delivering water up to everybody because it was really
20 warm outside.

21 Q. Was there -- was there any sort of veteran's
22 group that came out to help with the search?

23 A. Veteran's group?

24 Q. Yeah, did you ever hear anything about that?

25 A. Well, I'm part of that veteran's group. But as

1 a group, no, we did not do that.

2 Q. Okay. Was that a group -- when you -- the
3 approximately 20 people that came to search, do you know
4 if there was ever any announcement inside the veteran's
5 group to say, hey, let's go help with the search or
6 anything like that?

7 A. No, there was none. I was the president of
8 that group. So that group is down in Hemet, and they
9 would not have participated in the search. A lot of
10 them can't walk. They are Vietnam veterans. They are
11 really old. Some of them are in wheelchairs.

12 Q. What is the name of that --

13 A. Just the American Legion.

14 Q. American Legion of Hemet?

15 A. American Legion of California.

16 Q. Ms. Fedder, when you called the police to try
17 to get them to come search, do you recall the name of
18 any particular officer you spoke with?

19 A. I'm sorry, I'm having to -- my earbud ran out.
20 Can you hear me?

21 Q. Yeah, we can hear you just fine.

22 A. Okay. What was your question again?

23 Q. When you called the police about the search, do
24 you recall the names of any police officers or law
25 enforcement personnel that you spoke with?

1 A. Oh, yes.

2 Q. Who did you speak with?

3 A. Let me get you their names. Captain Purvis,
4 P-U-R-V-I-S. Investigator Munoz, M-U-N-O-Z. He was
5 with homicide in Hemet. Investigator Vasquez. Sergeant
6 Espinoza. Investigator Brian Robinson. Tony Johnson.
7 Let me see if there was anybody else. No. Just them.

8 Q. When Mr. Harper left in the RV to go to that
9 probation meeting or whatever that was, were you
10 actually physically at the property when he left?

11 A. Yes.

12 Q. Was anyone else there with you or --

13 A. Yes.

14 Q. Okay. Who else was there?

15 A. Julie Stanford. I believe Ronnie Imel -- yes,
16 Ronnie Imel and Sally Imel were there. I know there
17 were a couple of other people. There were a couple of
18 other people, but I'm drawing a blank right now.

19 Q. That's okay.

20 Can you talk to me about during that period
21 when Mr. Harper was away? Did you have any
22 communication with him at all?

23 A. I want to say every day.

24 Q. What was the nature of the discussions? Were
25 you just bringing him up to speed on where things were

1 **or what?**

2 A. Well, there was nothing to even discuss at that
3 point because we did not have access to anything. We
4 didn't know anything about bills. We didn't know
5 anything about bank accounts. We didn't know anything,
6 you know. And we didn't have a will. But we knew that
7 there was one and there was a new one. We didn't know
8 where they were located. Just feeding the animals. Let
9 me think.

10 A lot of it, he was just needing someone to
11 talk to. And, you know, he was crying, wondering what
12 happened to Dia, you know. That was most of it. He
13 just needed someone to talk to.

14 **Q. Did he ever express to you any concern that the**
15 **authorities may look at him as a potential suspect?**

16 A. Later on, yeah.

17 **Q. What did he say in that regard?**

18 A. I guess, you know, the same thing we all
19 thought. I mean, because with her disappearing and
20 nobody knowing anything and he being the trustee, they
21 would automatically look to him. That was it.

22 MR. OWENS: All right. I think that's all the
23 questions I have.

24 Mr. Healey, do you have questions? If so,
25 maybe we can take a break or if you are ready to go.

1 MR. HEALEY: Just a couple.

2 EXAMINATION

3 BY MR. HEALEY:

4 Q. Did the police ever look into Clinton as a
5 suspect, to your knowledge?

6 A. No, they did not.

7 Q. Did you ever tell them that -- what Dia had
8 told you about him?

9 A. Yes. And I also told them all the other people
10 that heard it directly from Dia's mouth as well.

11 Q. And you are not -- go ahead.

12 A. I'm sorry?

13 Q. So you were not the only one she told it to?

14 A. Oh, no, not at all.

15 Q. Who else did she tell it to?

16 A. There were a bunch of them. Julie Stanford,
17 she told her directly. She told Julia Mallory directly.
18 She told Star Evans directly. She told Kim Miller
19 directly.

20 And then I heard it from other people, like, in
21 the Bunco group that, well, yeah, she said if anything
22 ever happened to her, her son did it. So -- but that's
23 hearsay. They knew that she did not have a relationship
24 with her children, a lot of the ladies in the Bunco
25 group.

1 Q. It was well known the problems that she had
2 with her children?

3 A. Yes. Very well known.

4 Q. Which property is referred to as the Toolbox
5 property?

6 A. Garner Valley.

7 Q. Garner Valley?

8 A. Yes.

9 Q. Is that the one that was almost upside down?

10 A. Yes. Yes.

11 Q. Isn't it true that they had an offer to sell
12 that property?

13 A. Oh, they sure did. She wanted to sell that
14 property so bad to get out from underneath it. She
15 wished she could have kept it, but financially she knew
16 she couldn't, which is why she started moving everything
17 out of there to Bonita Vista.

18 Star Evans was handling that. We continued to
19 be in contact with her because that was Dia's wish.
20 She's the one that put it on the market. And an offer
21 did come in and it was accepted. And it would have just
22 wiped it clean.

23 That property was in Clem Abrams' name, even
24 though it was supposed to, somehow through paperwork, be
25 hers. I don't know how that works. But that would have

1 freed up that whole trust issue and really let us
2 concentrate on keeping the Bonita Vista running for her
3 return.

4 **Q. How come it didn't come to fruition?**

5 A. Clinton Abrams contacted his attorney to have
6 them stop the sale, saying that Harper had no right to
7 sell it.

8 **Q. You also said previously that the children were**
9 **paying some of the expenses of the ranch; is that true?**

10 A. They were supposed to but did not.

11 **Q. When -- did they ever pay any, to your**
12 **knowledge?**

13 A. We asked if -- we asked Clinton if he could pay
14 Isidro. Isidro was more family to Dia than a property
15 manager. She considered him family, and she did not
16 have the money to pay him. Whatever money she took in
17 from Sky High, she would deposit it into Clem's account.
18 And apparently the kids' attorney for Clem's trust were
19 supposed to pay bills and they never did.

20 So we asked him, Clinton, if he can pay Isidro,
21 to keep Isidro on, with all the animals and the
22 property. And he only paid a very small portion. I
23 think it was only like \$700. Like, one week's worth of
24 work or one-and-a-half week of work. They did not pay
25 him his full rate. And that was it. Isidro called and

1 asked him for more money, but he refused to pay him. So
2 we found the money to pay Isidro.

3 **Q. Isidro, did he participate in the search also?**

4 A. He was always there. I'm just trying to
5 remember. It was a busy day. It was a weekend. Julie
6 Stanford would know better. She would have contacted
7 him directly. I didn't have contact with Isidro
8 directly. I'm sure he did. He loved her.

9 **Q. Did a problem come in with the Airbnb that you**
10 **lost the listing on them or they refused to list the**
11 **property through the Airbnb agency?**

12 A. Yes. They were contacted by the children in
13 regards to the property and said there were problems
14 with the property, that the person running it possibly
15 killed her, and should take the listing down.

16 And I know we had a problem with that for a
17 while where we couldn't bring in any money to pay the
18 bills, like the fire insurance, the house insurance, the
19 mortgage payments. The -- we had to get rid of her
20 phone because we couldn't afford the phone bill. Just
21 to pay the basics.

22 It cost us about \$17,000 a month to keep that
23 place running. And -- just like the horse feed and all
24 that. So it really took a toll on us. And I think we
25 ended up going with VRBO for a while because of that.

1 **Q. Do you recall approximately when that occurred?**

2 A. I don't. I would have to look all that up on
3 Airbnb, to see when they sent out messages. I can only
4 guess at this point. Maybe October. It was about the
5 same time as getting the offer on the house, and it was
6 like we were getting hit with every turn, you know.

7 **Q. All right. Prior to that, did you have five**
8 **star ratings on everybody that had been at the Airbnb?**

9 A. Absolutely. We were renting out -- we called
10 it the tiny house. And -- which was Bonita Vista. And
11 then we had the two little tiny cabins that didn't even
12 have bathrooms in it. They had to use a community
13 bathroom. And we -- it's so serene that people loved
14 staying in this little, tiny, rustic little house with
15 no water, no -- nothing. Because they can sit on the
16 patio and watch the ducks.

17 We had people video it and post it on YouTube
18 showing how -- what a great place it was. The only
19 complaint, I think, we had was one person said that the
20 heater didn't work right. But we got that fixed as soon
21 as they told us.

22 But up until then, it was perfect. I mean, we
23 were getting people staying there, repeat customers.
24 People just wanted to come for the day, if they could,
25 you know, just to go for a hike. They were recommending

1 it to their friends.

2 **Q. Did Dia ever tell you that when she was out in**
3 **the pasture that she -- that somebody took a shot in the**
4 **vicinity of her?**

5 A. I don't recall that.

6 **Q. Do you recall her having any death threats at**
7 **all from anybody?**

8 A. I remember there being something, and I don't
9 know who it was from. But again, the only thing she --
10 referred to when it came to something like that was with
11 her ex-husband's -- or late husband's people that he
12 worked with and then Clinton.

13 MR. HEALEY: I don't have anything further.
14 Thank you very much.

15 FURTHER EXAMINATION

16 BY MR. OWENS:

17 **Q. Just one follow-up.**

18 Can you tell me, Ms. Fedder, to the best of
19 your recollection, the name of everyone who was in that
20 Bunco group that you have been referring to?

21 A. Oh, I would have to -- let me think. There was
22 about 15 people rotating in and out. And then some
23 people moved.

24 **Q. Can you tell me the ones that you believe that**
25 **Ms. Abrams was close with in terms of a friendship or**

1 **other relationship?**

2 A. There was Athena. And what is her name? I see
3 her all the time. I wonder if I can look at my contacts
4 or if that would mess up the feed.

5 MR. HEALEY: You testified earlier it was
6 Geges.

7 THE WITNESS: Yeah, I'm talking about another
8 female. She's Filipino, and she's a sweet lady, and her
9 and Dia were very close. Alice Wall. Alice Wall.

10 BY MR. OWENS:

11 **Q. Okay. What about any others that Ms. Abrams**
12 **was close with in that Bunco group?**

13 A. I think Julie would know better. I think Julie
14 Stanford would know better because they were in the
15 Bunco group longer better than me.

16 **Q. Sitting here right now, you can't remember any**
17 **others?**

18 A. I'm trying to think who was in her writing
19 group. No. I can only think of Alice Wall and Julie.
20 Julie Stanford was in there too and me.

21 MR. OWENS: All right. That's it for me.

22 Mr. Healey, anything further?

23 MR. HEALEY: Nothing further.

24 MR. OWENS: All right. I propose we just go
25 per code for the transcript.

1 MR. HEALEY: That's fine. I will stipulate to
2 it.

3 MR. OWENS: All right. Let's go off the
4 record.

5 (The deposition concluded at 12:59 p.m.)

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1 I, the undersigned, a Certified Shorthand
2 Reporter of the State of California, do hereby certify:

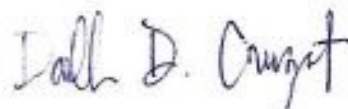
3 That the foregoing proceedings were taken
4 before me at the time and place herein set forth; that
5 any witnesses in the foregoing proceedings, prior to
6 testifying, were administered an oath; that a record of
7 the proceedings was made by me using machine shorthand
8 which was thereafter transcribed under my direction;
9 that the foregoing transcript is a true record of the
10 testimony given.

11 Further, that if the foregoing pertains to the
12 original transcript of a deposition in a Federal Case,
13 before completion of the proceedings, review of the
14 transcript [X] was [] was not requested.

15 I further certify I am neither financially
16 interested in the action nor a relative or employee of
17 any attorney or any party to this action.

18 IN WITNESS WHEREOF, I have this date subscribed
19 my name.

20
21 Dated: April 21, 2022

22
23 

24 _____
25 DANIELLE D. CRUZAT
CSR No. 13650

1 DECLARATION UNDER PENALTY OF PERJURY

2 Case Name: In re The Dia Kenshalo Abrams Trust

3 Date of Deposition: 04/11/2022

4 Job No.: 10097677

5
6 I, DIANA FEDDER, hereby certify
7 under penalty of perjury under the laws of the State of
8 _____ that the foregoing is true and correct.

9 Executed this _____ day of
10 _____, 2022, at _____.

11
12
13 _____
14 DIANA FEDDER

15
16 NOTARIZATION (If Required)

17 State of _____

18 County of _____

19 Subscribed and sworn to (or affirmed) before me on
20 this _____ day of _____, 20__,
21 by _____, proved to me on the
22 basis of satisfactory evidence to be the person
23 who appeared before me.

24 Signature: _____ (Seal)

25

1 DEPOSITION ERRATA SHEET

2 Case Name: In re The Dia Kenshalo Abrams Trust
Name of Witness: Diana Fedder
3 Date of Deposition: 04/11/2022
Job No.: 10097677

4 Reason Codes: 1. To clarify the record.
2. To conform to the facts.
5 3. To correct transcription errors.

6 Page _____ Line _____ Reason _____
7 From _____ to _____

8 Page _____ Line _____ Reason _____
9 From _____ to _____

10 Page _____ Line _____ Reason _____
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12 Page _____ Line _____ Reason _____
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1 DEPOSITION ERRATA SHEET

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13 From _____ to _____

14 Page _____ Line _____ Reason _____

15 From _____ to _____

16 Page _____ Line _____ Reason _____

17 From _____ to _____

18 Page _____ Line _____ Reason _____

19 From _____ to _____

20 Page _____ Line _____ Reason _____

21 From _____ to _____

22 _____ Subject to the above changes, I certify that the
transcript is true and correct

23 _____ No changes have been made. I certify that the
transcript is true and correct.

24

25 _____
DIANA FEDDER

Exhibits			
EX 001 - FEDDER, D 4:14 77:12,14,18 78:16 80:5	13650 5:6	22 44:6 84:24	9
	14 84:23	23 29:11,14 84:24	9 84:23
	15 84:17,22,23 98:22	24 84:24	9:00 41:6
	16 77:22 84:23	25 74:5 84:3,24	
	17 31:13 84:23	268 6:10	A
\$	18 22:8 31:13 84:24	27 77:15	
	19 84:24		A-N-Z-A 16:1
\$17,000 96:22	1:30 39:20	3	a.m. 5:2,5
\$2,000 20:20	1st 20:13,15	3 84:23	able 7:6 22:8 49:15 53:21 55:15 78:18
\$20,000 21:6		30th 29:8	Abrams 5:23,24 11:1, 3 13:3 17:1 25:24 30:19 32:7,11 34:22 35:12 36:23 39:25 48:18 50:9 53:11 55:20 60:6,19 61:24 63:18 66:11 76:10, 16,19,25 77:4,16 78:19 81:3,23 82:1 84:4 87:15 88:3 89:5 95:5 98:25 99:11
\$25 16:19	2	3283 6:10	
\$2500 20:17	2 39:20 77:24 78:16 84:23	38 44:6	
\$3,000 49:14	2,000 20:17	3rd 20:12	
\$500 24:19	20 7:9 31:2 40:22 41:8 44:22 47:8 84:3,24 87:9 90:3	4	
\$700 95:23	20-something 62:20	4 78:25 80:6 84:23	
-	2003 9:10	5	
---o0o--- 5:3,15,19 100:6	2004 29:23	5 79:5 84:23	Abrams' 26:5 44:13 50:7 52:1 57:11 65:22 66:18 70:14 79:2,9 80:20 86:4 88:11 94:23
1	2016 77:22	6	absconded 17:8
1 77:12,14,18 78:16 80:5 84:22	2017 29:8	6 84:23	Absolutely 54:1 97:9
10 84:23	2018 79:19 80:8,18 81:11	7	accepted 20:17 94:21
107 6:8	2019 58:24,25 69:11 70:22 71:7,8 73:9 80:14	7 84:23	access 15:8 49:25 55:15 92:3
10:00 41:7	2020 12:18 13:4,11 19:14,20 20:14 26:7 43:11 58:25 61:4 62:8 77:10 80:15 81:4	760 861-1705 6:14	accidents 30:17
10:11 5:2,5	2021 13:12	7th 13:5	account 14:13,25 15:2,5,6,7,12,17,18, 24 16:3,6,18 17:2 20:8,22 23:12 24:20 26:15,17 27:14 61:9 95:17
11 5:1 16:21 84:23	2022 5:1	8	
12 37:23 80:7,18 84:23	21 12:19 84:24	8 84:23	
12:59 100:5		8:30 41:6	
13 84:23			
13,000 16:22			

accounts 15:8,9,10 27:9 87:12 92:5 accurate 85:24 action 31:17 actual 45:3 adamant 72:4 73:4 added 57:20 66:24 additional 34:2 address 6:4,5,18 17:6 addresses 6:15 administer 5:7 administered 5:17 administering 5:10 advertising 22:24 advisor 88:8 affairs 14:21 afford 96:20 Afghanistan 31:18 agency 96:11 agent 6:25 29:13,25 83:11 agents 30:11,16 ages 31:12 ago 70:12 agree 5:8 21:2 Agreement 77:16 ahead 8:17 54:13 93:11 Airbnb 16:21 17:13, 16 19:6,10 23:13,16, 25 27:7,9 46:16 61:5,6,12,16,22 96:9,11 97:3,8 alarm 49:10,12	alarms 49:6,9,11 Alice 99:9,19 all-day 8:14 alleged 63:22 allowed 55:3,5 85:6 altercation 52:16 53:4 alternate 12:6 26:24 27:3 82:2 American 90:13,14, 15 amount 16:21 20:16 animal 39:14 65:24 73:7,8,17 74:23 animals 24:14 33:16 34:15 36:8 37:18 39:23 40:1 42:7 73:12 80:24 92:8 95:21 announcement 90:4 answer 7:16,20 8:18 answering 47:2 answers 8:2 anybody 48:16 75:8, 24 91:7 98:7 Anyplace 27:25 anyways 65:5 Anza 15:24,25 35:11 apart 64:2 66:2 apparently 84:9 95:18 appear 7:1 79:2 appearances 7:3 appeared 45:9 appointment 85:8	appreciate 33:23 approximately 24:17 34:9 41:5 47:11 51:14 58:23 87:8 90:3 97:1 April 5:1 75:1 area 40:10 areas 45:2 argue 82:17 argument 66:12 Arizona 51:13 armed 41:17,21 arrived 48:19,20 art 57:24 ashtray 54:5 aside 24:11 37:20 44:16,18 54:15 57:22,25 63:22 asked 26:10 33:20 36:9 38:7 40:23 43:5,19,21,22 54:18 59:8,25 61:11 73:24 82:25 95:13,20 96:1 assets 57:11 73:14 assistant 85:18 assume 7:17 10:11 23:20 assumption 40:6 Athena 75:11,16 76:14 77:2 99:2 Athena's 75:14 attend 28:9 attended 28:21 attention 12:24 attic 45:1	attorney 5:12,23 10:21,24,25 12:8 26:23 67:19 75:7,13, 25 76:1,20,23 83:4, 11,15,16,19,22 84:6, 16,25 88:4,6 95:5,18 attorneys 67:5 69:16 84:15,21,24 ATV 40:18,20,21 89:18 audible 7:21 audibly 7:20 August 20:13 Austin 28:8,11 authorities 43:22 92:15 automatically 92:21 availability 22:25 Avenue 15:22 aware 63:23
B			
Bachelor's 28:18 back 12:22,24 17:12 20:4,20 21:5 22:9 25:2 34:20 35:15,17 36:3 38:3,18 39:2,4, 15 42:6,18 44:21 48:1,23 50:12 51:18 63:6,14 68:19 69:15, 24 77:17,23 80:3,5 82:25 84:13 86:5,6,7 87:14 backdate 81:15 backdated 81:11 background 27:17 30:12			

bad 94:14	99:13,14,15	box 6:8 54:15	busy 96:5
balance 16:17,24	big 16:14 26:13 40:10 44:9 50:4 55:11 57:7 69:1 72:25	boxes 56:23,25	buy 24:10,14 49:18
bank 12:7 14:12,23, 25 15:1,5,11,20 16:2,3,18 20:8 24:21 26:15,17 27:9 92:5	biggest 66:20 67:15	boyfriend 61:25 62:23	<hr/>
barbecue 37:17 65:25	bill 96:20	branch 15:23	C
barn 19:4 45:2 66:6	billions 68:24	brand 44:2	cabinet 55:1
based 54:9	bills 11:9 15:2,10,11 17:20 20:23 22:7,9 69:3,4,6 86:9 92:4 95:19 96:18	brat 27:20	cabins 97:11
basic 86:2	binding 5:10	break 8:19,20 34:17 56:20 67:7 92:25	caliber 44:4,9,11
basically 19:6	bins 24:13	breaks 8:15	California 5:10 15:14, 22 29:20 50:25 62:14 63:10,13 90:15
basics 96:21	bit 7:1,2 11:15 27:18 31:8 35:16 40:8 71:11	breast 65:19	call 27:4 33:19 35:13 38:5,13 41:6 48:1,2 50:18 58:19 69:23, 24 76:4 84:16 85:7 86:1,20 87:7
bath 57:21	blank 91:18	Brent 85:3	called 17:4 25:12 38:3,7,21 43:24 47:14,15,21 48:3 61:13 68:13 70:8 73:23 76:2 82:22,25 84:6,17,22 85:9 86:19 90:16,23 95:25 97:9
bathroom 97:13	blood 51:23	Brian 91:6	calling 40:23 43:14, 15 47:1 76:13 84:20
bathrooms 97:12	blow 67:6	briefly 7:11	calls 43:15
bears 40:11	board 76:7	bring 22:17 38:18 40:18,24 70:20 71:3 73:11 96:17	camp 48:24
bedroom 46:7,19 50:4 55:13,24	Bonita 17:6,15,22 18:3,19,21 22:1,2 23:13,14,19 33:7,11 34:5,10,14 37:19 41:2 42:7 44:18 48:17 50:5 61:13 66:1,3,8 67:10 73:6 94:17 95:2 97:10	bringing 91:25	cancer 42:10 88:18
beds 37:6	book 23:6 40:5	broken 50:12,17,18 51:20 66:9	cans 42:13
beginning 5:12 12:19 75:1 80:15	booklet 8:3	brought 40:21 66:2 79:18	captain 47:19 91:3
believe 9:8,17 14:22 16:12 20:11,17 21:6 29:23 31:22 37:3 38:21 48:10 50:17, 19 51:25 54:14,20, 22 59:15 60:10,11 76:12 77:1 79:9 80:11,13 91:15 98:24	books 14:15	Broxton 5:11 6:8,11	car 30:17 41:20 43:17 54:4,6
belonged 44:14 50:9	bothered 46:3	building 89:15	card 84:9,12,14 86:3, 11
beneficiaries 73:19	bottom 77:24 78:17 79:1	bull 33:17	cards 52:5
benefit 25:8 73:16	bought 37:12	bunch 37:20 42:10 93:16	care 12:24 17:11
best 9:5 13:15 17:20 26:9 88:12 98:18	bowed 9:14	Burdo 67:20 68:14 88:6	
better 82:9 96:6	bowl 42:13	burly 72:25	
		business 51:7 84:14	
		businesses 30:15	

27:11,12 34:15 39:23 58:8 59:8,12 74:21	checked 80:23,25	codes 55:17 56:16	concentrate 95:2
caretaker 17:10	checking 34:25 46:10 74:11	coffee 55:2	concern 92:14
cargo 44:20	checks 15:16 30:12	coins 86:9	concerns 64:18 65:1
Carolina 28:2	children 31:6,10 37:18 46:14 66:19, 23 67:13 79:23 93:24 94:2 95:8 96:12	college 28:9	concluded 100:5
carries 40:8	Christmas 57:17	colleges 30:15	conducted 5:1 42:4
carry 40:13 41:14,16 53:12	circumstance 73:3	Colorado 59:15 61:19,21	confused 60:1 87:21
carrying 36:12	civil 9:16,18	come 22:4 32:9 33:22 38:19 39:4 40:19,24 47:12 48:8,23 59:25 63:13 67:10 68:13, 20 69:1,15 70:9,11 71:17 72:6 90:17 94:21 95:4 96:9 97:24	conjunction 21:15
case 9:12,22 13:6 46:13 60:15 65:17, 19 66:4	clean 32:9 39:9 94:22	comfortable 64:24	connection 41:11 53:24 57:14 89:12
cash 52:8	cleaner 35:6,19	coming 17:9,18 20:9 22:10 23:20 24:5 39:22 47:23 52:19 59:15	connections 60:18 71:3 72:11,12,13,17
cashier's 16:10,12	clear 7:14,18	comment 8:10	consent 54:24
caused 12:20 67:21	clearance 30:12,13, 14	comments 73:1	consider 6:17
caution 8:8	Clem 69:3 72:13 80:22 81:1 94:23	committed 30:4	considered 9:17 64:9 95:15
caveat 46:23	Clem's 68:2 69:17 71:14 95:17,18	common 31:6 66:22	consignment 67:4
cell 6:13 10:8,10 53:12,14	clinton 5:23 32:11 33:25 48:22 54:16 55:5 67:9,16 69:23 70:4,8 71:1 72:5,6, 16 74:24 93:4 95:5, 13,20 98:12	communicate 25:4 84:5	console 49:18
Center 31:1	Clinton's 66:25	communicating 69:21	constantly 63:11
certainly 8:15 31:23	close 60:24 74:16 88:13 98:25 99:9,12	communication 91:22	contact 94:19 96:7
chair 86:8	closed 15:24 58:10	community 30:23 97:12	contacted 95:5 96:6, 12
chairs 22:17	closer 12:22 82:5,10	company 49:12	contacts 99:3
changes 8:7,9,10	clue 45:9	compel 31:24	containers 45:4
changing 70:23	code 99:25	complaint 97:19	contention 69:1
character 81:14	code-compliant 5:6	computer 10:9 11:12 14:5	contents 56:17 57:3
charge 30:10 46:4			continue 19:10 23:16
charger 46:5			continued 94:18
charging 46:7,21			contrasting 49:2
Chase 14:13,14,25			conversation 26:2, 16,19 35:19,20 38:9, 25 86:16
chat 88:19			conversations 26:4 64:7 67:25 70:18 71:13
check 16:10,12,13,16 51:9			convo 61:10

copies 14:23 16:2	80:16	dealing 82:8	desired 73:18
copy 10:21,22,24 13:17,20 16:4 21:16, 18 85:21	cross-throughs 79:17	death 73:14 98:6	detailed 11:24 12:10
correct 18:20 26:21 44:11 51:1 55:6 64:19	crossed 77:25 80:12	deceased 31:16	Dia 10:25 11:3,18 13:3 17:13,19,23 18:22 19:5,23 20:17 21:13,15 22:13 23:8, 25 24:7 25:24 26:5 38:4,10,16 48:24 49:11 51:5 58:17 59:21 61:13 64:9 65:12 77:16 82:12 89:14 92:12 93:7 95:14 98:2 99:9
correctly 13:5	crossing 77:6 79:22	December 12:18 13:11 60:1,3 77:22 80:7,18 81:11	Dia's 11:7,17 13:15 14:20 15:13 18:7 22:20 26:8 33:16 42:11 54:7 58:14 61:13 78:20 84:8 93:10 94:19
cosmetic 59:5	Cruzat 5:6	decided 22:15 27:2	diagnosed 42:9
cost 96:22	cry 67:13 69:12	decline 87:25	dials 56:18
counsel 5:8 6:1 8:9	crying 92:11	deducing 54:9	Diana 5:16 15:6
counter 21:17	CSR 5:6	degree 28:14,17	Diana.fedder@yahoo. 6:19
counterfeiting 30:2	current 6:3	degrees 28:19	die 46:10
country 59:24 60:3	currently 29:4 31:19	delete 46:12	died 80:22 81:1
couple 10:1 32:19 37:16 40:11 42:13 43:8,9 58:1 63:13 71:13 81:18 91:17 93:1	customers 97:23	deliver 14:1	Diego 67:4 68:16,18 69:25 72:14
	Cute 39:8	delivering 89:19	different 6:6 7:3 28:5 45:22 47:4 67:2
	<hr/> D <hr/>	Dennis 75:22,23 76:20,21,25 84:5 86:17	dignitary 30:8
course 50:13 71:23	D-A-W-N 35:10	department 20:19 42:5 43:14,21 47:20	dinner 60:1,2,4
court 7:1,3,21,25 9:1 12:11 25:8,15 82:8	dad 66:24	deposed 7:7	direction 76:16
covered 24:25	dance 59:24	deposit 14:14 15:9 95:17	directly 93:10,17,18, 19 96:7,8
CPA 88:8	dancing 60:3	deposition 5:9,25 6:20 7:4 8:4 10:2,16 25:3,5,14,16,21 100:5	disappearance 26:7 33:8,10,13,14 46:11 49:17 52:2 60:17 76:22
credibility 8:11	Daniel 31:17	depositions 7:2,13	
credit 52:5	Danielle 5:5	describe 10:19 11:5 29:24 32:21	
creek 52:20,21	date 12:17 13:5 77:17,22 80:7,11 81:11	described 13:8,13	
creeks 89:17	dated 60:23	describing 12:1 26:22 47:7	
crevice 89:17	Dawn 35:10	descriptive 58:11	
criminal 29:3 30:1 63:24	day 13:9 33:13,14,15, 20 36:6,16,21,24 39:6,7 56:2,3,4 60:10 72:24 80:14 91:23 96:5 97:24	Desert 75:9 84:7	
Crisara 5:23 54:18 67:2 69:21,22 70:2 72:6 84:10	days 18:17 19:23 51:17 63:11,13 70:12	desire 73:13	
cross-outs 78:11	deal 16:14 27:12		
cross-through 78:23			

disappeared 58:25 65:7 66:4 72:24	22:14,21 30:11	easiest 15:10	estimating 41:8
disappearing 92:19	dollar 37:13	easy 64:21 66:7	estrangement 66:15
discuss 25:17 26:1 35:12 39:5,6,24 73:15 92:2	dollars 68:24	eat 59:20	Evans 88:21,22 93:18 94:18
discussed 11:19 13:15 25:13 37:8,10 62:4 63:25 66:13 83:20 87:10	donate 40:25	Edison 15:14	evening 33:24,25
discussion 66:20 84:1,3	donated 22:20	Edward's 28:13,14	event 8:15 12:11
discussions 46:11 64:2 91:24	door 51:20	effort 57:2,10	events 23:3,9 30:23 80:19
dishes 24:10 37:13, 14	doors 50:14	eight 67:12	everybody 30:13 89:19 97:8
disoriented 87:22	download 46:15 61:6	either 36:1 57:3 72:6	ex-husband's 98:11
dispose 54:23	drawing 91:18	electricity 11:8	exact 12:17
dispute 5:24 9:23 66:12	drink 88:1	electronic 30:2	exactly 51:16
distraught 33:20 67:12	drivable 50:17,19	emergency 56:16 60:15	EXAMINATION 5:20 93:2 98:15
divorced 66:23	drive 46:14 50:20 68:16,18,21	emotionally 32:14,15	examined 5:17
document 11:12 25:24 77:4,11,12,15 78:17 79:6,13 81:13 83:12,19,23	driver's 52:5	employed 29:4,6	Excel 11:14 13:18,23, 25 14:7
documented 15:3 20:12	driveway 50:12,19	enclosures 39:15	excited 37:14,19
documenting 11:23 13:14	drop 58:9 60:13	ended 47:18 96:25	executor 11:19 12:2, 3,5
documents 10:22 26:22 75:5 79:13,23 81:3,5,10,24	drops 51:23	enforcement 32:1 42:16 90:25	exhibit 77:12,14,18 78:16 80:5
dog 38:17 42:13 58:12	drove 40:20 50:25	engaged 31:19 47:8	exist 14:22
dogs 33:15 73:12	drug 66:25	engagement 22:13 23:4	existed 25:25
doing 7:4 11:14	ducks 97:16	engine 58:15	expense 11:24
	dumbfounded 47:16	entire 23:16 28:3	expenses 11:17 95:9
	duties 29:24	entitled 77:15	explained 25:16
	<hr/>	entry 51:19	express 25:20 65:1 92:14
	E	errands 36:6	expressed 64:17 82:2
	e-mail 6:15,18 14:1 61:8	especially 52:8,22	extent 57:22
	earbud 90:19	Espinoza 91:6	<hr/>
	earlier 13:8,13 36:6 38:2 63:17 78:4 79:12 89:10 99:5	estate 12:12 25:24 26:1,5,11 70:14 73:19 75:5 76:20 77:4 81:24	F
	early 43:10 54:25 77:10	estimate 7:6 32:17 34:9	Face 39:8
	earning 16:20		

Facebook 35:21,22, 23 36:1 41:18 fact 20:6 25:4 37:14 48:15 65:2 75:23 76:22 fair 48:13 57:8 60:21 79:13 fall 43:10 58:25 fallen 40:7 familiar 44:5 72:15 family 23:9 28:3 30:9 95:14,15 far 32:25 farm 37:18 fast 38:1 father 27:21 feasible 22:16 February 17:14 74:20 fed 36:7 42:7 Fedder 5:16,22 6:4, 20 7:16 8:22 10:1 14:19 15:6 27:17 31:17 34:22 77:14 90:16 98:18 federal 6:25 27:22,23 fee 23:11 feed 24:14 33:15,16, 17 39:8 96:23 99:4 feeding 92:8 feel 8:15 40:24 56:20 felt 21:2 female 51:6,9 64:16 99:8 fence 58:13 fiance 31:21 61:25	fiduciary 83:23 field 39:10,13,15,18 figure 14:18 27:1 81:7,9 figuring 84:1 filed 31:24 Filipino 99:8 final 74:13 finally 43:20 48:8 83:4 84:13,14 financial 14:20 30:3 88:8 financially 94:15 financials 16:5 27:11 71:24 find 33:13 38:4 39:21 41:1,11 45:8 47:1 65:4 68:20 76:7 84:12,19,21 86:3 88:10 finding 51:19,22 89:14 fine 64:19,25 81:8 90:21 100:1 finish 9:15 finished 28:22 finishing 36:9 fire 15:15 96:18 fireman 62:12 fires 27:6 first 6:7 26:23 30:24 40:1 46:23 48:17 56:12 58:4,7,23 60:15 62:8 85:7 fit 37:21 five 34:12 51:17 97:7	five-acre 19:3 fix 66:10 fixed 97:20 flip 77:17 Florida 13:1 15:22 28:2 29:2 flustered 26:12 folder 14:17 follow-up 6:1 98:17 follows 5:18 food 42:10,12,14 59:20 60:2 footage 49:25 50:1 forced 51:19 foreign 30:7 forgot 76:1 form 78:9 format 8:3 forth 17:22 63:6 forward 38:1 63:2 foul 52:1,12 found 13:9 17:19 47:2 48:6 75:11 84:14,25 96:2 four 18:3 32:19 45:22 fourth 18:25 frame 13:2 69:7 frames 58:2 fraud 30:3 free 8:15 40:24 56:20 freed 95:1 frequently 32:17 70:5 Friday 34:24 35:1,5,6, 18	friend 13:15 17:21 26:10 42:23 62:3 65:11 75:7,13,16,18, 25 82:11 88:12 friend's 42:18 friends 22:20 31:1,4 39:4 45:24 47:19 48:25 74:3 88:11,13, 23 98:1 friendship 98:25 front 42:15 43:16 77:23 82:23 fruition 95:4 frustrated 48:12,15 69:8 full 95:25 funds 30:2 furniture 70:9 further 98:13,15 99:22,23 <hr/> G <hr/> G-E-G-E-S 75:15 game 45:1 garage 24:7,13,18,23 37:12 44:17 53:25 57:14,15,16,23,24 70:8 Garcia 81:19 gardener 9:8,23 Garner 17:13,23 18:3, 24 19:2,6,9 23:25 30:20 32:24 33:1,17 34:25 35:2 36:3,8,9, 17 37:1 39:7 42:8 66:1,5 67:10 74:9,14 75:12 76:1 80:24 88:20 94:6,7
--	--	--	---

gas 20:3	54:21 62:24 68:6,22	57:8	happy 8:19
gate 58:10	71:4 72:1 73:24 74:7 75:11	guns 44:7 56:22	hardcopy 14:6
gathered 40:22	going 7:25 8:2,14	guy 65:13 75:25 76:13	Harper 11:20,22 12:3, 13,21 13:7,12,17,20, 25 14:20 16:2,9 20:21 21:17 23:11 26:16,23 33:19 34:4, 11,14 38:2,8,13,18, 19 39:11 42:6,21 43:4 46:5,6,19,22 47:14 48:18,21 50:24 54:12,20 55:15,17 56:15,22 57:5 58:4,5,14 59:12,18,21,25 60:7, 12,18 61:11,12,15 62:18 63:24 65:21 66:11 73:14,24 76:24 82:18 83:1 85:9,10 86:6,20,24 89:3,5 91:8,21 95:6
gears 58:3	10:11 17:23 18:18	guys 27:2 72:18,21, 25	
Geges 75:15 99:6	19:23 23:20 24:8		
generally 10:20 11:6 29:24	34:16 35:15 37:20, 23 39:5,6 40:17,18 42:20 44:21 46:17	H	
gentleman 62:5,10	51:3,18 54:17 55:3	habit 36:11	
Georgia 5:11 6:10 12:25	59:24 68:9,10,12	half 62:8 74:19	
getting 34:24 36:17 60:20 65:2 79:25 97:5,6,23	73:25 74:5,10 77:23 80:5 83:2 84:2 87:14 96:25	hand 65:19	
girls 59:23	goings 52:14	handed 87:6	
give 6:24 7:6 9:1,4 14:6 20:22 30:14 38:13 43:3,6,20,23 49:12 54:18 62:1 66:24 76:4 86:1	gold 50:11 54:2,4,8, 11	handful 45:19	
given 16:18 30:7 71:16	good 5:4 34:17 48:9, 24 58:19 62:2	handfuls 45:18	
giving 46:23 67:1	gotten 39:1,2 40:15	handgun 41:19 42:16,17,18 44:2,3	
go 7:11,14 8:17 12:7, 8 17:21 20:2 22:18, 24 25:2 28:4 30:9 32:8,13 33:17 34:17, 20 36:3,10 39:7,18 40:3 41:15 43:18 50:8 51:11 52:18,22 53:11 54:13 56:21 58:12,22 61:8 63:14 67:4,23 71:22 77:23 78:25 80:3,6 82:16 85:10,11 88:17 89:18 90:5 91:8 92:25 93:11 97:25 99:24 100:3	government 27:20, 22,23	handguns 41:22,25	
go-to 82:6	grand 67:18	handle 82:9,13,15	Harper's 45:2 50:7,15 58:9
goes 38:10 40:9	great 74:7 85:2 97:18	handled 84:7	Harvey 32:3,5
	grotto 65:25	handling 94:18	head 7:22 20:11 28:2 76:8
	ground 7:12,15	handwriting 77:25 78:7,17,19 79:1,3,6, 7,10,15	Healey 5:14 6:1 75:22 76:20,21,25 84:5 85:5,12,13,21 86:15, 17,24 88:4 92:24 93:1,3 98:13 99:5, 22,23 100:1
	group 89:22,23,25 90:1,2,5,8 93:21,25 98:20 99:12,15,19	handwritten 13:21,24 77:6,20 78:7 79:16, 20	Healey's 86:3 87:1
	grow 53:3	happen 22:20 37:23 43:7 51:7 84:2	hear 74:8 89:24 90:20,21
	grower 21:11	happened 12:20 30:9 48:7 51:7 54:11 56:16 60:19 69:14 72:5 92:12 93:22	heard 81:22 83:3 93:10,20
	growers 52:15 53:1	happening 38:23 49:8	hearsay 93:23
	growing 21:12	happens 70:25	heart 26:13 67:7
	guess 27:1 69:3 70:12 74:18 92:18 97:4		heater 97:20
	guesstimate 87:11		
	gun 40:8 42:23 44:1,9		

held 21:23,24	homicide 91:5	25:2 26:5 73:9 75:21	institution 28:20
help 32:9,10,12,14 36:10 40:19 59:8 60:25 61:1,21 65:23 69:6 74:23 89:22 90:5	hook 49:16,18	identification 77:18	institutions 28:21
helped 32:14	horse 45:24 96:23	Idyllwild 59:21	insurance 15:15 96:18
helping 12:4,13,16,21 13:7,12 20:8 23:17 24:6 61:5	horses 33:16 39:8 40:25	illegal 52:15 53:1	interest 41:11
Hemet 15:1,21,22 16:3 24:21 26:16 90:8,14 91:5	hose 52:19	Imel 42:24 44:7 47:18 48:20 50:22 62:19 91:15,16	interviewed 48:16
hep 61:11	hospital 80:22	Imel's 30:25 40:21	introduce 62:17,20
hey 65:12 75:8 83:24 90:5	hospitalized 12:23	Imels 62:18 88:24 89:2,9	introduced 37:17 58:16 62:18 89:6,7
Hi 5:22	host 22:12	immediately 31:5 40:22	inventory 57:2,10,13 84:10,11 86:8
high 17:4,5 18:8,11 19:22 20:9,12,18,25 21:20 28:4,5 30:12 44:9 95:17	hour 34:17	impact 8:11	investigate 30:2
highest 16:17,21	hours 36:14 37:5,9 48:10	important 7:18,19	investigations 30:15, 16
Highway 6:10	house 17:14 18:5,6 19:3,4 20:18 21:20 22:2,11 23:15 31:1 32:20,21,23,24,25 34:25 36:9,21 37:1, 20 38:19 39:2,5,16 40:21 42:18 43:1,2 44:19,23,24 45:10, 11,14,20 46:6,24 47:5,9,12,13 48:9 49:7 50:1,4 54:2,14 57:17 61:20,22 65:6 66:1,5 68:10,13,20 69:4 72:7,8,10,25 74:10 84:10,14 86:5 88:20 89:16 96:18 97:5,10,14	importantly 52:9	investigator 30:1 91:4,5,6
hike 40:3,4 41:21 43:18 97:25	houses 44:25 69:4	impression 39:20	invited 37:17
hikes 40:9 53:12	Hummer 50:15,16	in-person 86:23	involved 52:1 65:12 76:19
hiking 41:15 52:13	hundred 51:12	inappropriate 63:23 64:15	involvement 76:24
hill 36:7 40:4,7,16 53:1 89:18	hurt 40:16 52:12	inappropriately 51:6	involving 5:24 51:5
hills 41:1	husband 82:8	incident 51:9 63:22	ipad 10:7
Hilton 28:2	husband's 98:11	included 16:22	Isidro 17:10,11 21:13 24:11 37:11 80:25 81:18,19 95:14,20, 21,25 96:2,3,7
hiring 76:20		income 16:22,25 17:3 20:9 23:20,23,24 24:4,24	issue 65:10 95:1
history 63:24		individuals 17:7	items 44:14,16 52:6,8 54:24 57:16,22 80:12
hit 97:6		inexpensive 58:2	
hold 61:24		information 35:24 62:15 64:1 81:12 85:25	J
home 21:21 33:15 38:17 61:10	I	initials 78:24	Jacksonville 28:1
	idea 16:6 17:21 19:18	initiated 9:19	January 12:19 13:12
		inside 44:23,24 55:19,22,25 56:12 58:17 90:4	jeans 37:21,22

Jeep 50:17	kept 11:9 13:23 43:14 71:20 84:16 94:15	69:17,20,22 70:5,7, 20 71:16,22,23	lawsuit 9:7,9,11,17, 20,24 69:17 88:7
jewelry 53:21,23,24 54:14,17	key 45:16,22,23	73:17 74:4 75:8,14, 16,18,23,24 76:10, 21,22,24 78:21,22	learned 65:10
job 9:15 29:24	keys 45:13,15,18,19	79:17,19,20 80:22	leash 42:12 58:12
jogged 58:13	kids 66:24 67:21 70:23 71:15 73:4	81:8,21 82:4,10,11 83:8 87:15,19 88:2, 5,19 89:2,5 90:3	leave 36:19 42:17 51:3 63:14,17 69:23 73:13
Johnson 91:6	kids' 77:7 95:18	91:16 92:4,5,6,7,11, 12,18 94:25 96:6,16 97:6,25 98:9 99:13, 14	leaving 43:24
joined 32:11	killed 31:17 53:17 96:15	knowing 92:20	ledger 11:13 13:21,22 86:10
joke 37:21	Kim 88:15 93:18	knowledge 20:1 51:19,22 93:5 95:12	left 16:9 20:18 21:17 36:19 42:5 43:17 48:22 50:25 51:2 52:6,11 63:11 70:9 91:8,10
JPMORGAN 14:13,14	kind 7:11 10:2 28:10 32:6 37:7 46:3,22 47:16 50:15 54:10 55:12 69:5 71:4,24 82:12	known 62:19 88:25 94:1,3	leg 37:22
judge 64:21	kitchen 39:1 45:2 46:4,21 54:16 77:9 80:14,15 81:4	knows 44:7 49:1 82:15	Legal 71:22
Julia 39:3 48:21 49:2, 3,24 88:15,18 93:17	knew 23:8 30:20 45:23 52:10 56:18 58:6 64:10,23 70:2 82:7,13 84:8 92:6 93:23 94:15	<hr/> L <hr/>	Legion 90:13,14,15
Julia's 39:2,5	know 7:19 8:19 12:17 16:12 17:5,7 19:12, 15,17,19,24 20:6 21:12,14 30:19 34:23 37:25 41:15, 17,18,20,22 44:2,3, 7,8 45:13,19 46:9 47:15,24 49:1,23,24 50:2,22 51:2,4,6,14 52:8,12,14,25 53:5, 6,8,12,14,18 54:11 55:11,14 56:15,23 57:5,6 58:16 59:11, 14 60:22,23 62:3,5, 6,11,13 64:4,6,23, 24,25 65:16,21,23, 24 66:11,25 67:11, 13 68:1,5,10,15,19	L-A-N-C-E 85:3	lessons 59:24
Julie 17:12,21 25:6 26:8,9,12,14 38:5 48:21,25 49:3,24 59:21 82:10,13 88:12 91:15 93:16 96:5 99:13,19,20		label 62:1	let's 6:7 7:6 8:17 11:15 14:12,13 19:22 20:11 21:22 27:17 30:18 34:17, 20 36:3 38:1 55:24 58:3,6 70:14 78:25 87:14 90:5 100:3
July 20:12		labeled 62:2	letting 46:9
jump 55:9		ladies 93:24	level 30:12,13,14
jumped 58:10		lady 35:10 99:8	Lexus 50:12
June 13:4,5,11		laid 9:13	license 52:5
justice 29:3		Lance 85:3	licensed 5:9
<hr/> K <hr/>		land 18:4,19 23:20 27:6	life 69:19 80:1,2,20
keep 11:11,23 46:17 58:13 68:1 85:18 95:21 96:22		landscaper 9:10,13, 23	liked 37:15
keeping 21:1,3 95:2		laptop 10:6 27:5	line 58:13
Keith 11:22 12:3 16:9 20:21 50:15 54:12 56:15 58:5 60:7 73:14,24 83:7 85:8, 10,15 89:3		late 35:1 36:7 43:10, 12 48:11 82:7 98:11	lines 23:5
Kenshalo 77:16		law 9:1 32:1 42:16 90:24	lions 40:10

list 11:10,11 18:19 24:24 27:2 61:16,21 96:10	loose 86:9	marijuana 21:11,12	Messenger 35:22
listed 82:18	lost 66:5 96:10	mark 77:11,14	met 30:24 58:5,7 59:17,19 62:16 74:9
listing 96:10,15	lot 22:18,19 27:5 30:5 31:5 32:13 36:15 49:23 56:22 58:18 60:25 63:1 65:8 67:21 71:8 72:2 88:17,22 90:9 92:10 93:24	marked 44:17 77:18	meticulous 11:22 26:11
little 7:2 11:15 27:18 31:8 32:8 38:19 48:12 56:9,23 57:17 70:7 97:11,14	love 73:16	market 94:20	Mexican 59:20 60:2
live 32:25 33:3	loved 82:11 96:8 97:13	married 31:14,19	migraine 58:17
lived 18:22 19:25 30:20 84:25	lunch 39:19 67:6 71:18	master 46:7 50:4	migraines 58:18
lives 35:11 39:3 75:25 88:15	lunchtime 39:1	master's 28:22,23,25 29:2	mile 33:2
livid 79:24	<hr/>	material 8:9	Miller 88:15 93:18
living 63:3,5 71:15	M	mats 57:18,21	million-dollar 52:3
loaded 42:17	<hr/>	Matt 5:22	minute 44:21
local 62:13	M-U-N-O-Z 91:4	matter 80:6	minutes 87:9
locally 32:1	mad 81:16	mean 15:6 18:6 21:3 26:20 45:15 47:25 49:9 55:9 62:4 83:17 84:1 92:19 97:22	miracle 57:12
locate 53:21,23	Mafia 71:3 72:11,12, 14,15,21	medical 12:24	missing 11:20 13:3, 10 17:8,19 18:2,15 19:7,9,24 24:1,8 32:18 34:3 38:2,4,10 39:21 40:2 41:23 42:1 44:15 45:20 48:18 49:21 53:22 54:3 55:16,20 56:1 60:6,19 63:4,18 65:22 66:19 69:20 70:6 74:17 75:3 77:5 84:4 88:14
located 5:10,11 84:15 92:8	mail 6:7 25:16	medicated 42:12,13	mobile 21:21
location 29:15	mailing 6:5	medication 87:16	mode 67:18 68:7
long 19:12,13,19 29:9,21 30:10 37:4 48:13 51:14 64:22, 23 70:2 77:15 87:8	main 15:23 21:14	meet 67:5 74:10	mom 54:17
longer 36:15 47:24 48:6 99:15	maintain 27:6 63:7	meeting 67:3,20 85:24 86:23 87:3,8 91:9	moment 71:16
look 21:18,19 56:10 71:4 77:24 92:15,21 93:4 97:2 99:3	maintained 65:23	meetings 27:8 69:16	Monday 5:1 48:11
looked 54:10,21	making 19:6 37:6 66:7	member 30:9	money 15:3,9,12 16:8,19,20 17:9,11, 18,20 20:21,25 21:4 22:7,10,19 24:17,20 37:15 52:5 67:1 69:6 71:20 86:10 95:16 96:1,2,17
looking 45:6 46:25 50:13 56:21 63:1 75:6 82:24 84:7	Mallory 49:5 88:16 93:17	mental 87:25	
looks 37:25 80:7	man's 54:4,8	mention 73:13 83:10	
	manager 95:15	mentioned 21:23 23:4 38:2 41:14 43:25 69:12 72:11 81:18 88:11,23	
	managing 17:2	mess 99:4	
	manly 54:10	message 35:20 61:7	
	March 61:3 65:5 74:21	messages 43:24 69:24 97:3	

month 16:4,23 20:17, 21 49:17 56:13 74:19 96:22	75:10,13,14 76:6,14 84:25 85:3 90:12,17 94:23 98:19 99:2	nights 34:2,12	65:3,10,14,15
monthly 20:16	named 12:2 26:23,24 74:12 81:21 83:5,24, 25	nightstand 46:6,20 47:3	offense 65:17
months 19:21 22:8 23:17 43:8,9 67:12	names 77:7 90:24 91:3	nods 7:22	offer 25:18,21 94:11, 20 97:5
morning 5:4 41:7 48:1,2,3 60:16	naming 83:11	noise 49:10	office 10:23 84:7,22 85:11 87:1
mortgage 11:7 21:8 30:3 37:15 96:19	nature 9:11 91:24	notes 12:8 77:6 85:16,19,20,23	officer 5:9 29:1 51:10 90:18
mortgages 11:8	near 78:17	noticed 46:7 50:3	officers 90:24
mother 12:23 68:7	need 8:16,19 33:22 71:20,21 72:1,2,3 74:6	noticing 5:12	oh 22:1 26:3 30:1 33:18 43:8 57:1 61:2 62:17 71:11 73:10 75:11,24 77:9 78:13 84:25 85:23 87:9 91:1 93:14 94:13 98:21
mother's 5:24	needed 12:11,23 35:5 71:19 74:5 82:6 84:2 92:13	notorious 46:9	okay 6:9 7:11,19,23, 24 8:21 9:9 10:10,15 11:15 12:13 14:18 15:20 16:14,17 18:18 19:5,19 23:14 24:3 27:14 30:18 33:21,24 34:20 35:25 36:16,22 38:1 39:18 44:10,21 45:8 48:3 51:14 53:11 54:18 56:6 58:3,18 59:7,16 62:25 63:7, 16 64:23 69:9,12 70:18 71:6 72:9,23 74:4,7,16 76:9 77:22 78:8,13,25 79:5,12 83:18,25 84:18,20 85:4 86:13,20 87:14, 21 89:12 90:2,22 91:14,19 99:11
motion 31:24	needing 92:10	numerous 22:14 27:23 43:24 46:10 67:3,9	
motivator 32:9	needs 30:6 58:19 62:6	<hr/> O <hr/>	
mountain 31:1 40:10 52:16 89:1	neighbor 42:6	o'clock 39:20	
mouth 93:10	neighborhood 85:1	oath 5:7,10,17 8:23, 25	
move 29:15 66:7,8	neighbors 52:15 88:16	objection 5:9,13,14	
moved 12:22 19:14, 20 27:20 29:17 47:4 65:25 66:1 98:23	neither 72:5	objections 8:2	
moving 17:15 30:21 94:16	never 20:3,5 38:9 43:22 45:11 48:15 49:25 52:11 62:2,16, 25 63:25 64:7 65:11 66:13 67:8 70:11 72:14 73:2,18 81:22 83:20 95:19	obtain 20:21 28:14,19	
mowing 65:24	new 11:18 49:18 61:7 68:23 92:7	obtained 14:24 17:7	
mudroom 55:12,14 56:11	nice 15:14	obtaining 22:6	
mule 33:18	night 33:5,7,11,12 34:1 36:14 47:1 48:11 59:24	occasion 24:15,16 53:18 56:14 69:13	
multiple 24:15		occasions 23:2 60:7 67:3	
Munoz 91:4		occurred 80:20 97:1	
<hr/> N <hr/>		October 97:4	
name 5:5,22 15:3,5,7, 12,16 25:9 26:8,18 27:15 31:16 32:2 35:10 49:4 67:19		odd 73:1	
		offender 64:5,10	
			old 24:9 27:4 49:22 57:20 58:15 67:17 90:11
			older 31:7,8
			once 8:6 17:23 61:3

62:22 69:25 89:8	page 13:16 18:9 77:24 78:15,16,25 79:5 80:6 85:16	paying 11:7 23:11 49:13 69:3 95:9	38:9,22 46:1,4,5,6,9, 10,11,16,17 47:3,20 48:2 53:12 60:9 61:2,6,12,13 74:22 85:10 96:20
one-and-a-half 95:24	pages 77:15	payment 11:24 15:14	phones 53:15
ones 14:12 50:19 57:7,19 79:21 98:24	paid 20:24 21:6 27:10 69:3,7 95:22	payments 11:16 14:15 15:15 96:19	photos 22:13 23:4,6 46:13
ongoing 69:16	pain 87:16	pen 79:20	physical 14:10 49:9 62:6
open 10:11 16:7 56:17,25	pairs 37:20,22	pending 8:17	physically 29:19 91:10
opened 15:7 86:11	Palm 75:9 84:6	pens 65:24	pick 68:20
opening 50:14	papers 56:8,9	people 23:2,7,8 39:22 40:17,19,22,23,25 41:9 44:22 47:8 48:5,23 52:24 53:5,6 60:23 64:21 71:8 73:1 82:5 89:10 90:3 91:17,18 93:9,20 97:13,17,23,24 98:11,22,23	pickup 67:17
operate 19:10	paperwork 10:17,19 26:12 94:24	percent 51:12	picture 40:14 41:18 53:16 58:1,2
opinion 26:9	parents 12:23	perfect 97:22	picture's 53:19
opportunity 8:5,7	parole 29:1	perfectly 81:8	pictures 55:4,5
order 12:10	part 8:7 11:21 12:9 47:4 65:7 68:2 72:21 85:13 89:25	period 17:1 20:7,10 42:17 52:11 62:7 91:20	place 29:18 57:18 96:23 97:18
organize 32:10,12,13	participate 89:9 96:3	periods 66:14	places 88:17
organized 85:18	participated 41:9 90:9	permanent 19:13 24:2	plan 22:12 25:18 26:1,5 39:7,22 67:23 70:15 73:19 75:5 81:24 84:21
original 79:18	particular 27:25 80:18 90:18	person 9:19 11:23 14:3,17 31:8 48:9 59:6 60:7 62:16 76:11 81:21 82:6,9 96:14 97:19	planning 25:24 76:20 77:4
originally 27:19,24	party 9:7,24	person's 76:6	plans 25:21 66:7
ornaments 57:18	passed 57:11	personal 20:1 54:23	play 37:24 52:1,12
outdoor 22:15 45:2	password 49:13,15	personally 21:4 44:8 50:10,23 53:14	please 6:3 48:5
outings 23:9	passwords 74:22	personnel 90:25	PO 6:8
outside 58:14 89:20	pasture 21:24 39:14 98:3	phone 6:13 10:8,10 35:13,20 36:1,12	point 13:4 28:25 31:4 43:3 50:25 65:8,10 86:4 92:3 97:4
owed 22:9	patio 82:23 97:16		police 20:19 21:10 42:5,22 43:14,21,22 47:9,12,14,15,23 48:10,13 53:3 90:16,
Owens 5:13,21,22 32:16 34:16,20,21 77:21 92:22 98:16 99:10,21,24 100:3	pavement 9:13		
owned 18:11	pay 11:8 15:2,10,11 17:10,11,20 20:22 21:5,7 22:7,8,10 37:15 69:6 95:11,13, 16,19,20,24 96:1,2, 17,21		
owner 15:6			
owners 53:6			
<hr/> P <hr/>			
P-U-R-V-I-S 91:4			
p.m. 100:5			

23,24 93:4	41:7 58:25 65:5	pry 64:11	rarely 69:22
portion 95:22	67:17 74:18,25 75:1	public 30:17	rate 95:25
possession 14:11,19	77:9 88:12	purchasing 21:5	ratings 97:8
possible 89:16	probation 51:4,5,10	purpose 34:13	rattlesnake 40:8,14
possibly 96:14	63:12,15,16,21 91:9	purse 41:20 45:10,21,	53:17
post 97:17	problem 9:14 44:10	22 46:1 84:12 86:7,	rattlesnakes 40:9
posted 41:18	66:25 96:9,16	9,11	reaction 64:20
posting 40:14	problems 22:6 46:18	pursue 28:25	read 40:5
potential 31:23 92:15	49:12,24 64:22 86:1	Purvis 91:3	ready 34:25 36:17
potentially 39:24	94:1 96:13	put 8:3 11:19 13:23	92:25
power 10:21,24,25	proceedings 32:11	20:22 23:11 24:11,	real 60:18 80:3
26:22 83:11,14,16,	process 8:8	20 26:17 37:12,20	really 48:24 62:2,25
19,22	professional 88:2	40:21 44:16 54:15	67:1,7,21 69:7 73:3
prepare 10:15,17	program 28:23	55:1 57:22,25 68:22	80:5 85:20 87:11
prepared 8:6	programs 46:12	86:10 94:20	89:19 90:11 95:1
preprinted 78:8	promised 52:23	putting 27:5 37:6	96:24
prescription 87:16	properties 18:1,4	66:3	Realtor 88:20
present 37:2 81:23	33:3,6 34:3 42:1	Q	reason 9:4 21:14
87:3	44:14 45:17 61:12,		26:10 51:25 80:13
president 30:8 90:7	15,18 65:22	quarter 79:5	82:15
prettier 31:9	property 18:11,16	question 7:16,17	recall 9:24 14:16
pretty 11:9 13:9	19:3,22,25 20:9,24,	8:17,18 31:22 52:3	15:21 16:15,17 23:9
32:12 63:5 72:25	25 21:6,7,8,20,25	83:13 86:19 90:22	24:17 26:19 30:21,
previous 36:14 57:16	22:2,5,13,25 23:3,	questions 6:1 7:18,	24 35:9 37:8 38:24
previously 95:8	14,19 34:5,10,14	20 8:1 10:1 86:1	44:8,11 49:22 51:16
primarily 57:7	35:2 36:4,17,18	92:23,24	56:6,19 66:14,17
primary 6:18 18:7	39:17 41:3 42:5	quick 38:12 80:3	70:19 76:8 79:14
82:19	44:22 45:4 48:18	quite 7:1 35:16 36:14	86:23 87:10 90:17,
printed 14:6	53:7 73:6 74:14	71:11 73:11	24 97:1 98:5,6
prior 11:20 24:8	91:10 94:4,5,12,14,	R	receipts 10:21 11:5,7,
30:22 37:16 40:15	23 95:14,22 96:11,		8,16 14:9,16
52:17 97:7	13,14	raided 20:19 21:10	received 25:15 38:5
private 59:6 62:15	propose 99:24	raise 22:7,19	receiving 73:5
64:12	protect 30:7	ran 26:8 58:11 90:19	reception 53:20
probably 7:10 30:25	protection 30:5	ranch 17:5 61:1 95:9	Recess 34:19
	provide 13:17,20,25	randomly 84:20	recognize 78:18 79:7
	16:4 35:7 39:23		recollection 98:19
	providers 88:3		

recommend 75:20	release 54:25	resident 63:10 75:12 76:5	Ronnie 30:25 40:20 42:24 44:7 47:18 48:20 50:22 62:18 91:15,16
recommendation 35:5,7 76:15	released 40:11	residential 6:5	room 10:4 45:1 55:12
recommended 35:9 75:18	relevant 31:22,24	respect 83:19	rotating 98:22
recommending 97:25	remained 19:20	respond 36:11 61:9	roughly 20:7 23:16
record 5:5,8 7:14 15:3 25:8 34:18,20 100:4	remember 9:14 13:5 20:12 36:12 40:14 43:8 44:4 56:8 60:3 69:13 76:6 82:22,24 96:5 98:8 99:16	responded 56:2	Ruby 38:16,18 42:9 45:11,12 52:10,11 58:8,9,10,16 59:8,12 60:11
records 14:19,22	remote 10:2	response 7:21	rules 7:12,15
recruiting 30:11	Remotely 5:1	rest 56:23	run 23:16 26:13
recruitment 30:11	remove 41:25 42:3 44:13 70:23	resulted 23:10	run-ins 72:15
red 50:17 79:20	rent 17:7,9 20:12,13, 21 21:1 22:6 37:15 74:20	retired 29:7,10,19	rundown 38:12
redid 83:4	rental 20:16	return 43:15 60:11 67:16 95:3	running 11:10,11,24 16:23 17:24 36:6,7 95:2 96:14,23
redo 71:20,21	rented 74:20	review 8:5,8 12:12	runs 50:18
refer 8:3	renter 24:2 61:7	reviewed 10:18	rustic 97:14
referred 94:4 98:10	renters 20:18 74:10	rid 13:24 96:19	RV 45:3 50:19,21,24 63:18 91:8
referring 76:25 77:13 78:4 98:20	renting 74:19 97:9	ride 41:1 68:19	
refuge 73:7,8	repeat 97:23	rifle 41:19	S
refused 96:1,10	report 51:19,22	rifles 41:22,25	
regard 92:17	reporter 5:6 7:21,25 25:8	right 9:2 10:4,12,13 15:20 18:11,16,22 21:22 23:21 24:1,23 26:24 34:16 36:3 41:3 43:9 44:10 54:22 59:2,9 64:18 66:10 70:14 76:17 78:9 81:13,14,16 83:23 86:12 88:24 89:6 91:18 92:22 95:6 97:7,20 99:16, 21,24 100:3	S-T-A-N-F-O-R-D 25:10
regarding 26:11 31:6	representing 5:23	ring 45:23 54:2,4,8,11	safe 42:20,21,25 54:15 56:7,15
regards 27:9 69:16 96:13	required 64:4	rings 45:23	safes 55:10,11,17,20 56:19 57:3,8
register 64:4	requires 9:1	Riverside 29:20,22	sake 53:19
registered 65:13	rescue 73:17	Robinson 91:6	sale 24:7,13,18,23 44:17 53:25 57:14, 15,16,23,24 95:6
registry 65:16	rescues 73:12	Rocky 39:8	Sally 30:25 40:20 42:24 48:20 62:18 91:16
rehab 72:17	reservations 17:17	role 29:12 83:18 89:12	
relate 11:6	reserved 23:3		
related 11:16 14:20	residence 6:4,9 17:4 18:7,19,22 20:2 63:7,12,14		
relationship 30:18 62:3 66:19,23 67:2 70:2 89:3 93:23 99:1			
relayed 72:20			

San 67:4 68:16,18 69:25 72:14	19,22	setting 10:3 63:21	29:5 36:2 39:12 43:2 44:12 57:1,4,9,12 63:19 78:10 81:20 86:25 87:2
sanctuary 74:24	secretary 87:5	seven 6:16	sister 31:7
sat 48:9	secure 42:20	sex 64:5,10 65:2,10, 13,15,17	sisters 82:12
Saturday 25:12,13 26:2,3	secured 42:20,25	sexual 62:3	sit 40:4 87:5 88:18 97:15
Savannah 28:6	security 71:15	share 64:13	sitting 44:10 47:3 82:23 86:8 99:16
saw 20:5 35:2,3,23 36:4,22 49:25 56:12, 21 74:14 77:6 80:14, 16	see 13:2 14:12,13 20:9,11 21:18 22:16 30:22 32:17,22 34:22 36:20,25 39:16 42:19 53:2,15 54:2 55:19,22,25 58:6 61:10 62:6 77:3,8,12 78:2,17 80:9 86:10 87:24 91:7 97:3 99:2	sheep 33:16	situation 21:15 61:6
saying 71:20 85:23 95:6	seeing 56:6,19 60:22 79:15	sheets 37:6	six 19:21 23:16 34:12 60:5
says 69:10	seen 60:7	shelf 55:2	six-month 20:7 24:5, 25
school 27:4 28:4	sell 24:9 53:24 57:24 88:21 94:11,13 95:7	sheriff's 47:20	size 37:22,23 54:9,10
schools 28:5	sense 8:12 26:17 52:4	shift 58:3	skiing 51:8
SCI 30:14	sent 10:22 48:8 75:10 97:3	shipping 45:4	Sky 17:4,5 18:8,11 19:22 20:9,12,18,24 21:20 95:17
science 28:18	separate 63:7 64:1	shot 98:3	slipped 65:19
scooping 65:24	separated 24:9	shotgun 53:17	slips 14:14
screen 10:11,12	September 19:14,20 20:15 29:8	show 47:25 67:11 68:9 77:11,17 78:14	small 9:16 10:10 30:23 44:3 54:15 55:13,24 56:6,8 95:22
search 21:16 40:19, 24 41:5,9,12 44:21, 23 47:7,11,12 48:25 50:9,10 51:18 56:4 73:2 89:9,13,22 90:3,5,9,17,23 96:3	September/october 43:13	showed 42:23 47:16 48:10,22 56:17 70:11 72:25 81:3	smoking 82:25
searched 44:22,24,25 45:1,5 46:24 47:9 50:6,11,21,23 89:15	serene 97:13	showing 55:8 97:18	social 71:15
searches 42:4 49:7	Sergeant 91:5	side 39:16 52:15 53:1	sold 57:18
searching 33:15 39:24 40:23 41:2 47:24 48:5	service 6:25 27:21 29:7,9,12,19,22 30:7 88:2	sign 10:8 61:9 68:4	somebody 12:12 47:25 48:8 98:3
seat 42:15 43:16	set 14:13,25 15:11,19 17:13,15 23:15 24:7 26:15 44:18	signed 11:18 81:23	son 93:22
second 58:21,22 59:17,20		significance 80:19	soon 97:20
secret 6:25 29:7,9,12,		signs 51:19 87:24	sorry 15:19 22:1 25:7 32:4 43:25 52:24 53:5 54:7,13 55:9 90:19 93:12
		siphon 52:20	
		sir 6:12 11:2,4 12:15 13:19,22 14:8,12 15:7 19:1 21:9 22:3, 23 25:1 28:13,24	

sort 7:22 11:11 41:19 49:20 52:1 57:13 72:21 81:10 87:16, 24 89:2,21 sorts 51:5 sound 58:11 sounds 7:12 26:20, 21,23 39:22 48:12 64:17 81:11 sources 16:25 17:3 24:4,24 South 28:2 southeast 27:24,25 Southern 15:14 space 46:16 spared 71:17 speak 25:11 35:25 61:2 85:11 91:2 special 29:13,25 30:11,15,16 42:10, 12 specific 69:13 speeches 30:14 speed 91:25 spell 15:25 25:9 spend 33:5,7,11 spending 31:3 88:21 spent 30:21 34:1 spoke 35:4 60:10,11, 14 61:19 69:22,23 70:4,5 76:10 90:18, 25 spoken 8:1 38:7 85:4 86:14 spot 40:4 spouse 31:16	spreadsheet 13:18 14:7 St 28:13,14 stack 56:9 stalls 39:9 Stanford 17:12,21 25:6,11,13,17,20,23 26:5,9 38:5 49:3 59:21 88:12 91:15 93:16 96:6 99:14,20 star 88:21,22 93:18 94:18 97:8 stars 82:24 start 17:22 22:14 40:23 55:24 72:7 started 11:14 13:7 16:19,20 17:4,17,24 21:1 31:2 39:22 40:23 66:9 74:19 88:21 94:16 starting 78:14 state 29:2 50:25 65:18 statements 14:23 16:3 27:10 States 6:25 27:21 30:4 stay 34:2 36:18 37:17 55:3 stayed 34:10 37:16 staying 34:13 97:14, 23 STENOGRAPHER 5:4 step 17:12 26:10 35:17 38:3 stipulate 5:13,14 100:1	stop 12:16,20 95:6 stopped 69:3,5 store 37:13 story 64:10,24 street 17:6 39:3 stressed 67:21 strong 67:24 structure 19:2 structured 23:8 stuff 24:10,12 32:13 45:18 67:5 72:2 75:9 80:24 82:8 substance 25:17,20 suit 9:16,18 summer 43:10 Sunday 47:13,17 83:7 support 67:24 71:15 supposed 65:13 67:10 68:18 69:5 70:10 74:20 94:24 95:10,19 sure 12:9,10 13:16 18:9 20:3 50:11 51:12 53:9 57:15 65:12 85:16 94:13 96:8 surgery 38:16,17 58:7 59:1,4,5,7 87:15,17,22 surprised 82:1 surveillance 49:20 50:1 suspect 92:15 93:5 SUV 50:12 sweet 99:8	system 49:13,20,22 50:3 systems 82:8 <hr/> T <hr/> T.j.maxx 24:10 T.j.maxx. 58:2 table 46:21 77:9 80:15 81:4 tables 22:17 take 7:22 8:15,20 12:24 17:11 34:17 37:11 53:16 54:19 55:4,5 56:9 57:12 58:8 59:8,12,24 66:7 68:9,10,13 69:2 74:21 85:16 92:25 96:15 taken 6:21 43:18 52:6,7,9 53:19 talk 10:7 11:15 12:7 19:22 21:22 25:23 27:17 30:18 38:8 43:13 48:1 58:3 60:24 70:14,15 71:19 73:3 74:1 82:20 83:2,14,22 85:6,8,9 86:20 87:14 91:20 92:11,13 talked 34:24 35:18 60:9,16 73:2 83:21 85:9 88:4,16 talking 10:6,25 13:18, 21 14:9 36:13 38:11 39:11 41:2 47:18 62:8 63:17 70:22 71:14 73:10 76:13 88:19 89:10 99:7 Tanner 32:3,5
--	--	---	---

Tara 67:20 68:14 88:6	71:4 80:4,21 81:1	35:3 36:12,20,22	town 32:21 34:4,11,
tasked 30:6	92:18 98:9	40:25 47:6 48:17,19	14 42:6 59:13 82:22
tasks 12:14,21 13:7,	things 31:5 32:6	49:21 56:12 58:4,7,	86:7
13	39:23 54:23 57:18	21,22,23 59:2,17,20,	track 11:24 84:16
tease 31:7 37:25	64:11 66:9 72:7	23 60:15,25 61:1,7	trailer 40:21 44:20
telephone 35:24 47:2	82:16 91:25	62:7,21 63:3,5,8,11	transaction 15:14
73:24	think 6:16 8:14 9:16	65:6,8 67:8,20 69:7,	transcript 8:4,6 99:25
tell 6:3 9:2 27:18 38:6	12:3 14:5,24 17:16	25 70:1 71:10,16,19	transfer 46:13
48:4 50:8 52:19	18:4 19:14 24:4,19,	74:13,16 75:5 76:15	transferred 27:22
58:4,19,22 59:16	24 31:25 38:2,15	81:1 86:18,22 88:22	transfers 30:3
61:2,11,18 64:14	39:3 40:1 41:6,7	97:5 99:3	transmission 68:23
71:7,12 73:8,21	49:2,17,19 50:6 52:4	times 6:23 7:7,9	transportation 67:19
78:18 79:22 82:18	54:21 58:1 59:5,19	32:19 34:10 43:24	68:8
83:9,18 93:7,15	60:12 67:25 70:10,	59:19 67:9 71:12	travel 30:6
98:2,18,24	12 75:15,24 76:3,4	81:18 85:4 86:16	treated 73:5
telling 38:24	80:21,25 81:2 82:14,	tiny 97:10,11,14	trial 8:10
Temecula 88:15	23 84:6,17 85:7,20	today 5:25 7:4 8:1,23	tried 67:3 85:7 86:22
ten 7:7 48:9	86:18 87:13 89:7	9:5 10:16 25:3,5	89:18
tenant 19:14,15,17,19	92:9,22 95:23 96:24	told 11:18 20:4,20	truck 38:20 42:11,15,
34:25 36:18	97:19 98:21 99:13,	21:13 38:22 42:21	20 50:13 54:7 58:15
tenants 18:14 19:23,	18,19	43:16 46:25 51:3,4,8	67:17 68:1,2,13,15,
25 20:4	thinking 40:15 51:16	52:21,22 53:3 55:2	19,22,25 69:2
terms 80:19 83:22	68:12	66:6 68:14 71:8	true 94:11 95:9
88:11 98:25	third 18:21 59:23	73:18 74:11,13,23	trunk 70:10
testified 5:18 99:5	thought 36:15 37:24	75:1,4 76:4 83:4,24	trust 5:24 12:12
testifying 79:12	40:2 74:3 76:2 82:9	87:6 93:8,9,13,17,18	25:23 68:3 69:6,18
testimony 8:7 9:5	85:23 92:19	97:21	70:16 71:14 77:16
25:18,21	thousand 16:23	toll 96:24	78:16 83:17,21
Texas 28:6,7,12	threats 98:6	Tony 91:6	85:21 95:1,18
text 35:20 36:13	three 32:19 37:5,9	Toolbox 94:4	trustee 11:21 43:6
77:25	45:22 52:17 55:22	top 20:11 55:2 76:8	73:22 74:12 82:3,19
texted 35:16,23 60:12	59:19 60:7 87:4	topic 64:8 66:20	83:1,21 92:20
Thank 98:14	threw 71:24	70:19	trusts 75:8 76:2 77:3
thanks 37:24 74:7	thumb 46:14	total 16:23 34:12	truth 9:2
thing 7:23 8:16 25:15	Thursday 34:23,24	touch 37:12	try 8:17 41:1 49:18
27:11 37:7 40:3	35:4 36:4,11	touched 51:6	67:5 73:25 82:15
67:15 68:8,17 70:13	time 5:5 8:10,11 13:2	touching 63:23 64:15	83:2 90:16
	16:18 17:1,18 18:1,	65:19	
	15 20:10 22:7,14,20	towels 24:9 57:21	
	27:23 29:6 30:7,10,		
	22 31:3 33:9 34:17		

trying 14:18 27:1,6 42:7 43:13 46:12,15 58:1 65:11 81:7,9 82:20 84:19,21 88:21 96:4 99:18 turn 20:2 68:14 97:6 turned 46:7,20 73:6 two 18:3,4,17 28:5 31:11 33:16 40:15 52:17 55:11,14 56:11,13 57:7 66:15 67:18 97:11 type 30:3 42:9 44:1 65:16 typically 32:20 40:3, 13 46:3 53:11 <hr/> <p style="text-align: center;">U</p> <hr/> uh-huhs 7:22 ultimately 61:21 unable 12:22 unattended 42:5,17 underneath 58:11 94:14 understand 8:13,22, 25 23:15 47:22 51:8 63:9 65:11 67:8,14 68:6 83:13 understanding 7:13 13:3 63:20 66:18 72:12,20 understood 7:17 unique 10:2 United 6:25 27:21 30:4 university 28:9,12, 13,15	unlocked 42:15 updated 75:4 upkeep 22:10 upper 55:1 upset 68:12 69:2 upside 94:9 upstairs 55:18 use 17:10 31:6 37:13 97:12 usually 16:23 40:8 62:17 uterine 42:9 utilities 11:9 <hr/> <p style="text-align: center;">V</p> <hr/> vacated 18:16 19:23 Valentino 81:21 Valley 17:13,24 18:3, 24 19:2,6,9 23:25 30:20 32:24 33:1,17 34:25 35:2 36:3,8,9, 17 37:1 39:7 42:8 66:1,5 67:10 74:10, 14 75:12 76:1 80:24 88:20 94:6,7 Vasquez 91:5 vehicle 45:16 50:7 68:21 89:15 vehicles 45:2,3 49:7 50:6,8 verbal 52:16 veteran's 89:21,23,25 90:4 veterans 90:10 vice 30:8	vicinity 98:4 Victor 81:21 video 50:1 84:11 97:17 videoconference 5:12 Vietnam 90:10 visit 71:17 visitation 51:4 visiting 63:1 visits 63:2 Vista 17:6,15,22 18:3, 19,21 22:1,2 23:13, 14,19 33:7,11 34:5, 10,14 37:19 41:3 42:7 44:19 48:17 50:5 61:14 66:2,3,8 67:10 73:6 94:17 95:2 97:10 visual 49:13 visually 56:22 VRBO 96:25 <hr/> <p style="text-align: center;">W</p> <hr/> wait 47:24 walk 53:2,18 90:10 walked 52:7 Wall 99:9,19 wallet 84:9 86:4,11 want 12:18 18:9 19:21 21:17 32:23 33:25 34:23 37:5,10 42:19 43:12 51:12 56:20 58:6,24 63:21 65:12 67:12 68:19, 25 72:6 75:2 79:25 80:1 82:21 85:15	86:6 91:23 wanted 15:3 22:14 36:8,10 38:13 40:25 46:17 47:15 49:16 56:15 61:16 64:12 66:1,4,6 67:15,16 70:15,21,23 71:19 73:11,21 74:21 82:2 85:11 94:13 97:24 wanting 68:1,2 85:17 wants 31:25 warm 89:20 warrant 21:16 wasn't 37:23 43:9 44:9 47:2 58:12 65:8 66:10 70:13 85:6 88:17 watch 38:16 97:16 water 15:15 20:3 40:24 52:20 89:19 97:15 waterways 89:17 way 15:1,10,13 53:2, 9,19 58:13 68:21 73:5 76:19 79:6 81:4 82:13,16,17 87:19 89:14 we'll 40:18 weapon 40:13 41:14, 15 43:16,17,19,23 wedding 16:22 21:22, 23,24 22:5,21,25 23:6 weddings 22:12,13, 16 Weddingwire 23:1 week 27:8 32:19 40:14 70:1 74:8 95:24
---	--	--	--

week's 95:23	witness 5:7,11 31:23 32:12 77:19 99:7	89:24 90:21 92:16 93:21 99:7
weekend 37:16 96:5	woman 65:17,18	year 24:12 69:19 70:5
weekly 27:8 70:13	women 62:4	years 29:11,14 31:2 62:20 74:5 84:3 88:25 89:1
weeks 52:17 75:2	wonder 99:3	yelled 52:17
weird 73:3	wondering 92:11	young 62:5
went 11:20 13:3 15:1, 4,13 16:5 17:8,19 18:2,15 19:6,9 20:5 21:14 23:25 28:5 32:18 34:3 38:1 39:10,21 40:2,7 41:23 42:1,6,11 44:15 45:11,20 48:17 49:6,18,21 52:21 53:22 54:3 55:16,20,25 59:20 60:4,6,19 61:10 63:4,18 65:11,22 66:19 69:20,25 70:6 72:19 74:17 75:2,12 76:3 77:4 80:23 83:3 84:4,10 86:5 88:13 89:14,17	word 61:25	younger 62:12
	words 8:1	Youtube 97:17
	work 7:13 17:23 22:18,19 29:14,16 39:7 53:15 65:21 68:22 95:24 97:20	<hr/> Z <hr/>
	worked 50:16 98:12	Zen 48:23,24
	working 19:5 29:2,18, 21 38:19 49:23 58:14 66:10	zero 37:23
	works 94:25	zoom 10:12 71:22 78:21
	worth 22:9 67:18 68:5,23 95:23	
	wouldn't 37:13 38:18 52:12,23 67:11,18 69:24 85:8	
weren't 17:25 47:15 81:23	wow 30:1	
west 39:16	write 12:8	
wheelchairs 90:11	writing 11:13 99:18	
when's 29:6 56:11	written 15:16 16:13 78:5,22 80:7 81:5	
widow 31:15	wrong 26:21 52:10	
wife 48:21	wrote 79:19 81:10,13	
wills 76:2	<hr/> Y <hr/>	
window 24:5,25 35:5, 19 51:20	yeah 9:18 10:23 15:20 33:23 44:10 49:10 55:18 62:24 63:3 65:9 71:8 72:1 73:10 77:19 78:3,6, 20,24 85:2 88:25	
wiped 94:22		
wish 94:19		
wished 94:15		
withdraw 75:17 80:17		
withdrew 16:8		