

1 And so if she has separate property,
2 she has separate property. And she should not be
3 compelled by virtue of this notice, as trustee, to
4 have to answer questions about that.

5 MR. EDWARDS: My response to that,
6 Your Honor, is that's essentially putting the
7 burden on me to win a fraudulent transfer action
8 before I'm even able to ask about the asset.

9 JUDGE HARDESTY: Yeah, the question
10 certainly can be asked regarding what assets
11 Mrs. Mona possesses, et cetera. And if her
12 response is, "Well, this asset is my separate,"
13 you know, you can ask your follow-up question,
14 "Well, you know, how is that your separate asset?"

15 It was, you know -- you are entitled
16 to delve into her testimony if she claims under
17 oath that something is her separate asset, you
18 know, because asking it -- you know, it's like
19 discovery. You ask the questions to get the
20 details and the facts of the information, which
21 may or may not lead to a finding that this asset
22 is -- is an asset or property which may be used to
23 satisfy said judgment, and this -- this property
24 is not property that may be used to satisfy said
25 judgment.

1 So, yes, you are entitled to ask
2 those questions, and she's entitled to -- to
3 answer them and definitely should answer those
4 types of questions.

5 MR. COFFING: So, Your Honor, if I
6 may, not so hypothetically, if an account is
7 presented, and that account is entitled Rhonda
8 Mona, her sole and separate property, I mean, that
9 should be dispositive of the issue, and foreseeing
10 your -- I think what your ruling is, forcing me to
11 prove what she owns rather than prove what she
12 doesn't own.

13 MR. EDWARDS: To distinguish it,
14 Your Honor, I think if I can show that that
15 separate property came from Mr. Mona or came from
16 the community property estate, then -- and I can
17 tell you for sure we have that situation here --
18 I'm certainly entitled to dive into the
19 circumstances surrounding how she became in
20 possession of that property in her -- her
21 individual capacity. And that in and of itself is
22 a legal conclusion that I shouldn't be barred from
23 gathering the facts to determine.

24 JUDGE HARDESTY: The Court agrees
25 with Mr. Edwards. Again, we're dealing with a

1 broad scope, if you will, regarding, you know,
2 collection of judgments. And then, two, you know,
3 again, just because a piece of paper says
4 something, does not necessarily mean that it's
5 true.

6 That will be the Court's order.
7 Again, if you have specific issues that arise, I'm
8 here all day today. You're welcome to contact us
9 again. I hope that the order is sufficiently
10 clear to give both sides guidance as to the scope
11 that's permitted in terms of the questions and the
12 answers and the examination today.

13 MR. EDWARDS: Thank you, Your Honor.

14 JUDGE HARDESTY: Thank you both.

15 MR. COFFING: Thank you.

16 (Whereupon, a recess was taken.)

17

18 (Prior to the commencement of the
19 deposition, all of the parties present agreed to
20 waive statements by the court reporter, pursuant
21 to Rule 30(b)4 of NRCp.)

22

23 (Exhibit No. 1 was marked.)

24

25 RHONDA MONA,

1 having been first duly sworn, was examined and
2 testified as follows:

3

4

EXAMINATION

5 BY MR. EDWARDS:

6 Q Ma'am, I'm showing you what's been
7 marked as Exhibit 1.

8 Do you recognize this document?

9 A Yes, I've seen it before.

10 Q And what is it?

11 A Post-marital property settlement
12 agreement.

13 Q Okay. Do you recognize your initials at
14 the bottom of each page?

15 A I do.

16 Q And feel free to flip through if you
17 want.

18 Those are your initials on each page?

19 A Uh-huh.

20 Q One of the rules we'll talk about later
21 is, because the court reporter is here and taking
22 down everything that we're saying, it's important
23 that you give audible answers. Whereas a head nod
24 will usually work, if you can answer with a yes or
25 no, I'd appreciate it.

1 A Sorry.

2 Q That's okay. And if I remind you, I'm
3 not trying to be rude. I'm just making sure that
4 the court reporter gets down what she's supposed
5 to.

6 So you do recognize your initials at the
7 bottoms of each of the pages on Exhibit 1?

8 A Yes, I do.

9 Q And on the next to the last page, do you
10 recognize your signature?

11 A Yes.

12 Q Okay. Do you recall initialing and
13 signing this document?

14 A Vaguely.

15 Q Okay. What's your understanding of the
16 purpose of this agreement?

17 A I really didn't delve into it.

18 Q Okay. Did you read the agreement?

19 A Not really, no.

20 Q Did you skim it?

21 A The first page.

22 Q Okay.

23 A Yeah.

24 Q What did you gather when you skimmed the
25 first page?

1 A I really don't know.

2 Q Okay.

3 A I sign what I'm supposed to sign.

4 Q Okay. So I -- why did you sign this?

5 MR. COFFING: Well, to the extent you
6 had a conversation with an attorney, we don't want
7 to go into that. So if -- if any answer requires
8 divulging what your attorney said, I'm going to
9 say don't answer that, and make sure you
10 understand that. Okay?

11 THE WITNESS: Okay.

12 BY MR. EDWARDS:

13 Q Did you discuss this with an attorney,
14 Exhibit 1?

15 A I don't -- I don't recall.

16 Q Okay. And you have no understanding of
17 the purpose of this agreement?

18 A I might have discussed it with Bart
19 maybe.

20 Q Okay.

21 A Yeah.

22 Q And do you have any understanding what
23 this agreement is meant for?

24 A A little bit.

25 Q Okay. Can you give me your basic

1 understanding, please?

2 A That if we get divorced, that what's
3 mine is mine.

4 Q Okay. So sort of a -- you saw this as
5 sort of a prenuptial agreement?

6 A No. Post.

7 Q Post-nuptial agreement?

8 A Uh-huh.

9 Q Okay. If you'd turn to the second page
10 of Exhibit 1, look at the first line.

11 Could you read that for me?

12 A "Whereas it is the parties' intent to
13 acknowledge, confirm, and document their equal" --

14 Q And the whole sentence, if you would.

15 A Oh -- "their equal division between
16 themselves of the said \$6,813,220.20 they received
17 from the sale of their MMI corporate stock, with
18 Rhonda receiving \$3,406,601.10 of such moneys as
19 her sole and separate property, and Mike receiving
20 the remaining" -- blah, blah, blah -- "as his sole
21 and separate property."

22 Q Did you receive your \$3.4 million as set
23 forth in this agreement?

24 A Yes.

25 Q All of it?

1 A I thought I only got two and something,
2 but ...

3 Q So you think there may still be about
4 1.4 million that you haven't received yet?

5 A I don't know.

6 Q Okay. Where is that money?

7 A Most of that's gone.

8 Q Okay. Where did it go?

9 A Am I allowed to answer that?

10 MR. COFFING: Yeah.

11 THE WITNESS: A lot of it went to a
12 bad business deal.

13 BY MR. EDWARDS:

14 Q What bad business deal?

15 A Purchasing Super Bowl tickets. Bad
16 decision.

17 Q Okay. How much did you spend purchasing
18 Super Bowl tickets?

19 A About 5- or 600,000.

20 Q And what happened with that? Can you
21 tell me, what was the idea behind purchasing those
22 Super Bowl tickets?

23 A It was -- can I answer?

24 MR. COFFING: Yeah. You can tell him
25 about the transaction, yeah.

1 THE WITNESS: I gave it to a ticket
2 broker to buy tickets to resell them, and he
3 embezzled the money and went to jail, so ...

4 BY MR. EDWARDS:

5 Q Okay. So you never actually received
6 any tickets, weren't able to resell anything?

7 A He did, kept the money, and he went to
8 jail.

9 Q Understood.
10 What's his name?

11 A Jonathon Robiste.

12 Q Can you spell that?

13 A R-O-B-I-S-T-E.

14 Q Was he here in Las Vegas or elsewhere?

15 A He was in New York.

16 Q New York. Okay.

17 So you think you received about
18 \$2 million. So what happened with the other
19 \$1.5 million?

20 A I lent some to my son to buy his home.

21 Q Okay. How much did you lend to your
22 son?

23 A Close to 900, I think.

24 Q Okay. What's your son's name?

25 A Michael.

1 Q Michael Mona, III; right?

2 A Uh-huh.

3 Q And where is the home?

4 A In San Diego.

5 Q How old is your son?

6 A Twenty-nine.

7 Q Twenty-nine?

8 A Uh-huh.

9 Q Is there a loan agreement between you
10 and your son, or was this just a handshake deal?

11 A I don't know. I don't know if there's
12 paperwork on it or not. I really don't.

13 Q Okay. Has your son started paying you
14 on that \$900,000 loan?

15 A Not yet, no.

16 Q Is it -- is it your expectation that he
17 will start paying you at some point?

18 A I would assume so at some point, when
19 he's in a better financial -- he's not yet.

20 Q Okay. Is it your intent that he will
21 simply pay you back when he eventually sells the
22 property?

23 A I -- I didn't get into it. I don't
24 know.

25 Q Okay. Do you know the address of the

1 property in San Diego?

2 A Uh-huh.

3 Q What is it?

4 A 877 Island Avenue.

5 Q And there's a unit number, as well;
6 right?

7 A 701.

8 Q Right next to Petco; right?

9 A Uh-huh.

10 Q Okay. So you spent about 5- to 600,000
11 on the tickets -- or attempted tickets, about
12 900,000 to your son for the house.

13 What happened to the rest of the money?

14 A I paid my bills with them.

15 Q Okay. What bills?

16 A My house bills.

17 Q And what house bills did you pay, or are
18 you still using that money to pay bills?

19 A Uh-huh, yeah.

20 Q Okay. Where is that money sitting?

21 A In a money market account.

22 Q With what bank?

23 MR. COFFING: You can tell him.

24 THE WITNESS: Bank of George.

25

1 BY MR. EDWARDS:

2 Q Do you know the balance in the Bank of
3 George account?

4 A Right around 300,000.

5 Q Who are the signatories on the Bank of
6 George account?

7 A Just me.

8 Q Was your husband ever a signatory on
9 that account?

10 A Never.

11 Q Do you have any other accounts that are
12 solely in your name?

13 A Yes.

14 Q Where are those accounts?

15 A Bank of George.

16 Q Okay. Multiple accounts at Bank of
17 George?

18 A The other one is a checking account that
19 I actually write my bills out of.

20 Q Okay. How much do you estimate is in
21 the checking account at Bank of George?

22 A I just put enough in to write my bills.

23 Q Okay. Do you have any other accounts --

24 A No.

25 Q -- personally?

1 A No.

2 Q I guess individually is the proper term.

3 A No.

4 Oh, yes, I'm sorry, I have a -- my
5 own -- my own checking account, too. And I'm
6 sorry, the other account is in Bank of Nevada, not
7 Bank of George. I'm sorry. My household account
8 is in Bank of Nevada.

9 Q Okay. So is there still a checking
10 account associated with Bank of George?

11 A Yes, my own.

12 Q Your personal?

13 A Uh-huh.

14 Q Okay. And then your household account
15 is Bank of Nevada?

16 A Right, so --

17 Q And that's just you as the signatory on
18 that account?

19 A Yes.

20 Q Okay. Can you estimate how much money
21 is in the Bank of Nevada account?

22 A That's the one that's just enough to pay
23 my bills.

24 Q I see. Okay.

25 Then what is the amount in the Bank of

1 George checking account?

2 A That's just my mine. It's been mine for
3 forever. Nothing to do with my husband at all,
4 never has had anything to do with him.

5 Q Okay. And so what balance is in that
6 account?

7 A Do I have to answer?

8 MR. COFFING: Well, this is an
9 account that predated the judgment, and so ...

10 THE WITNESS: No, it's got nothing to
11 do with him.

12 MR. COFFING: It has nothing to do
13 with -- with anything related to the judgment. It
14 predates it, so this is kind of --

15 THE WITNESS: It's money that I
16 had -- I got paid for working, so it's money --
17 it's my own money.

18 BY MR. EDWARDS:

19 Q Okay. And I appreciate that, but I need
20 to know the answer.

21 MR. COFFING: To the best of your
22 knowledge, what's the --

23 THE WITNESS: About 190,000.

24 BY MR. EDWARDS:

25 Q In the Bank of George checking account?

1 A Uh-huh.

2 Q Okay. So that's money you owned -- you
3 earned from working?

4 A Uh-huh.

5 Q What do you do for work?

6 A Designer.

7 Q And when did you do this designer work
8 to earn that 190,000? I guess it was probably
9 multiple jobs.

10 A No. I actually got one lump sum for
11 200,000.

12 Q Okay. When did you get that lump sum?

13 A Approximately eight years ago, maybe.
14 Seven, six, I don't know.

15 Q So you got about approximately \$200,000
16 lump sum, and you've only spent about 10,000 of it
17 so far?

18 A No. It goes up and down, you know.
19 Yeah. Yeah, for the most part, that's what my
20 balance has been, yeah.

21 Q I see. And it goes up when you do other
22 work and you put money in there?

23 A When I put money in there. But just by
24 a few thousand dollars, that's it.

25 Q Sure. Sure. Understood.

1 Was that one big job you did --
2 A Uh-huh.
3 Q -- back six or seven years ago?
4 What was that job?
5 A It was for someone's residence.
6 Q Okay. Here in town?
7 A Yes.
8 Q Who is that?
9 A Mike Shustek.
10 Q Did he pay you everything you were
11 supposed to receive for that job?
12 A Uh-huh, yes.
13 Q He doesn't owe you any more money?
14 A No.
15 Q And to this day, you're still doing
16 various design jobs?
17 A Not really, no. Just for my husband,
18 actually.
19 Q Okay. And how does that work?
20 A I don't get paid.
21 Q Okay. So your husband --
22 A I work for free.
23 Q I'm sorry. Go ahead.
24 A I work for free.
25 Q Okay. So, for example, if your husband

1 has a piece of property and he asks you to do some
2 design work for him?

3 A Just his offices.

4 Q His offices. Okay.

5 I guess at what point in time did you
6 stop doing work?

7 A A few years ago.

8 Q About eight years ago?

9 A No, about -- yeah. No about five years
10 ago.

11 Q About five years ago. Okay.

12 And how long have you been married to

13 Mr. Mona?

14 A 32 years.

15 Q Congratulations. That's a long time.

16 A Thank you.

17 Q Do you know the bank account number for
18 either Bank of George account?

19 A No.

20 Q Do you have a card with you that would
21 allow you access to that money -- to that money?

22 A Do I have a card?

23 Q You know, for example, a Visa card, a
24 debit card?

25 A No.

1 Q How do you access that money?

2 A I go to the bank. I'm old school.

3 Q So you don't have a debit card or a
4 credit card --

5 A No.

6 Q -- associated with either of the
7 accounts at Bank of George?

8 A No.

9 Q Do you have a credit card or a debit
10 card associated with the Bank of Nevada account?

11 A No.

12 Q And when you need to pay your monthly
13 bills, do I understand you take the money from the
14 Bank of George money market account and put it
15 into the Bank of Nevada account?

16 A Correct.

17 Q Okay. Are there other sources of money
18 for the Bank of George money market account?

19 A No.

20 Q Are there other sources of money, other
21 than your design work, for the checking account at
22 Bank of George?

23 A No.

24 Q And the only source of money for the
25 money in the checking account at Bank of Nevada is

1 the Bank of George money market account?

2 A Correct.

3 Q Okay. Are there any other accounts you
4 can think of where you are the sole signatory?

5 A No.

6 Q And, I'm sorry, I probably asked this,
7 but as to those three different accounts we talked
8 about -- the money market account, the checking
9 account, both at the Bank of George and the Bank
10 of Nevada account -- you are the sole signatory;
11 correct?

12 A Sole.

13 Q You're still happily married; right?

14 A Yes.

15 Q Not planning to get divorced?

16 MR. COFFING: That's a day-to-day
17 question; right?

18 THE WITNESS: It depends.

19 BY MR. EDWARDS:

20 Q You're not planning to get divorced, are
21 you?

22 A Not at this time.

23 MR. COFFING: Well -- okay.

24 THE WITNESS: Not today.

25

1 BY MR. EDWARDS:

2 Q You're not contemplating getting
3 divorced? That's --

4 MR. COFFING: I mean, this really
5 does go into conversations she might have had with
6 her spouse. So to the -- unless you have a
7 personal independent thought -- you know, if it's
8 something you talked about, then don't answer.

9 BY MR. EDWARDS:

10 Q I'm not asking for Mr. Mona's opinion on
11 whether you should stay married. I just want to
12 understand your point of view.

13 A About what?

14 Q Whether you're contemplating divorce.

15 It sounds to me you're happily married
16 and it's not a thought in your mind, but -- is
17 that accurate?

18 A Well, it depends.

19 (Exhibit No. 2 was marked.)

20 BY MR. EDWARDS:

21 Q Ma'am, I'm showing you what's been
22 marked as Exhibit 2.

23 Do you recognize this document?

24 A No. I actually have no idea what I'm
25 looking at.

1 What is this?

2 Q If you look down at the footer at the
3 bottom, it looks like it came from Comerica.

4 A No.

5 Q This statement --

6 A I don't even know what Comerica is.

7 MR. COFFING: I mean, that's what it
8 says. I don't know.

9 THE WITNESS: Webbanking.Comerica, I
10 don't -- I really didn't know what this is. No
11 idea.

12 BY MR. EDWARDS:

13 Q Okay. Do you know, have you or your
14 husband ever maintained a bank account at
15 Comerica?

16 A I can't answer what he does. I have no
17 idea what he does.

18 Q Okay.

19 A I know about those three bank accounts.
20 I'm -- that's it.

21 Q Okay. Do you know of any joint bank
22 accounts that you hold with your husband?

23 A Nope.

24 Q None whatsoever?

25 A That I know of, no. Huh-uh.

1 Q If you look at the first transaction on
2 Exhibit 2 dated August 21st, 2013, as best I can
3 tell, this is a wire transfer from this account to
4 you for \$100,000.

5 Do you see that?

6 A I do.

7 Q Do you recall receiving this wire
8 transfer?

9 A No.

10 Q Do you have any idea where this wire
11 transfer was sent?

12 A No. I mean, if it was sent to me, then
13 it was sent to one of those accounts.

14 Q One of those three accounts?

15 A Well, it would have only been probably
16 the Bank of Nevada.

17 Q Okay. And why do you say the Bank of
18 Nevada account?

19 A Because it was never transferred into my
20 own personal one, and it -- I have never put any
21 other money into the money market.

22 Q Other money other than what?

23 A When that initial first went in.

24 Q Okay. Maybe -- then I'm confused. So
25 let's go back to the Bank of George money market

1 **account.**

2 A Right.

3 Q Where did that money come from?

4 A From my husband.

5 Q Okay. And why do you have that money
6 sitting in the account?

7 A I'm -- I don't understand the question.

8 Q Well, I mean, your husband just wrote
9 you a check for \$2 million?

10 MR. COFFING: Wait a second. What
11 \$2 million are you talking about?

12 MR. EDWARDS: I guess my
13 understanding was the -- that the money in the
14 Bank of George money market account was the
15 remaining from the roughly \$2 million he gave you
16 associated with Exhibit 1, the --

17 THE WITNESS: Right. We've already
18 gone over that.

19 MR. COFFING: Yeah, and I would
20 object to the characterization of "gave," because
21 that's not what the agreement says.

22 BY MR. EDWARDS:

23 Q So do I have it right, that the money in
24 the Bank of George money market account is the
25 remaining money from the money he gave you --

1 A Correct.

2 Q -- associated with the post-marital
3 agreement?

4 A Correct.

5 Q Okay. And another silly rule is, I know
6 you know exactly what I'm asking, so it's easy for
7 you to answer it. But for the record, if you
8 could let me finish my question before you answer
9 it, it makes for a much cleaner record, and
10 otherwise she may throw something at us. I'm not
11 trying to be rude, but I'm just trying to
12 cooperate.

13 So your recollection is that Exhibit 2,
14 the first transaction here of \$100,000 to you is
15 something separate than the money associated with
16 the post-marital agreement?

17 A Yes. I don't remember what that's for,
18 but what I was trying to tell you is that after
19 that money went into the money market account, no
20 additional funds have ever been placed there, so
21 it could not have gone there.

22 Q Do you remember when the money was
23 placed in the money market account at Bank of
24 George?

25 A A few years ago. I think it was before

1 this whole thing.

2 Q Okay. Do you know -- you don't know
3 why, then, you were wired \$100,000 as shown on
4 Exhibit 2?

5 A I would assume to pay bills.

6 Q And that makes sense.

7 MR. COFFING: Don't assume. If you
8 know, you know.

9 THE WITNESS: I don't recall it,
10 so ...

11 BY MR. EDWARDS:

12 Q But best of your recollection is the
13 money was to pay bills, and that's why it was sent
14 to the Bank of Nevada checking account?

15 A I don't even know for sure that it was
16 sent to the Bank of Nevada account, but that's --
17 if it went to me, that's the only place it
18 logically would have gone.

19 Q Understood. Okay.

20 So I guess earlier -- and maybe I'm
21 confusing myself, because I thought the only
22 source of money for the checking account at Bank
23 of Nevada was the money market account at Bank of
24 George.

25 A Mostly, yes.

1 Q Okay. But there are some exceptions?

2 A I don't know. I really don't remember
3 this. I honestly don't, so ...

4 Q And that's fair. Just separate and
5 apart from this particular exhibit, Exhibit 2, are
6 there other sources of money that --

7 A No. Oh, I'm sorry.

8 Q That's okay.

9 Are there other sources of money that
10 fund the Bank of Nevada checking account?

11 A No.

12 Q And when I say other than, I mean other
13 than the Bank of George money market account.

14 A That's the only way I put money in
15 there.

16 Q Although there may be some exceptions?

17 A I -- I don't know, because I don't
18 recall that, but ...

19 (Exhibit No. 3 was marked.)

20 BY MR. EDWARDS:

21 Q Okay. I'm showing you what's been
22 marked as Exhibit 3.

23 Do you recognize this document?

24 A No.

25 Q Exhibit 3 purports along the top of the

1 page to be from Bank of Nevada.

2 You see that; right?

3 A No.

4 MR. COFFING: Right up here.

5 THE WITNESS: Oh, okay.

6 BY MR. EDWARDS:

7 Q Do you see that?

8 A Is this all one account?

9 Q As best I can tell, this is one account
10 statement, yes.

11 A Okay. It's not my account.

12 Q Well, you'll see above the double line
13 there it says, Michael Joseph Mona, Jr., and
14 Rhonda Helene Mona.

15 A I do see that.

16 MR. COFFING: But it also says POD.

17 THE WITNESS: What's that mean?

18 MR. COFFING: Rhonda would be the
19 paid on death.

20 THE WITNESS: I didn't even know that
21 this existed.

22 BY MR. EDWARDS:

23 Q Okay. Understood.

24 So you don't know if you have any
25 signing authority as it relates to this account?

1 A I have no idea.

2 Q Okay. About halfway down the page, do
3 you see your name after a wire out --

4 A I do.

5 Q -- for \$750,000?

6 A I do.

7 Q Do you know why you were receiving this
8 wire?

9 A I have no recollection.

10 Q Do you believe it was part of the
11 post-marital agreement or living expenses?

12 A I literally don't remember, so ...

13 Q Do you have any idea where this money
14 was transferred to?

15 A I literally do not remember this, so you
16 can ask it a different way, but I don't remember.

17 (Exhibit No. 4 was marked.)

18 BY MR. EDWARDS:

19 Q Ma'am, I'm showing you what's been
20 marked as Exhibit 4.

21 Do you recognize this document?

22 A No.

23 Q This also appears to be another Bank of
24 Nevada account in your husband's name; is that
25 right?

1 A I have never seen this. Is this the
2 same account? It's the same account.

3 Q Okay. Again about halfway down the
4 page, do you see a wire out to you for \$440,000?

5 A I do.

6 Q Do you know why you were receiving this?

7 A No, I don't recall.

8 Q Do you have any idea where this money
9 was wired to?

10 A No, I don't recall.

11 Q And you don't remember the purpose?

12 A No.

13 Q Are there documents you could refer to
14 that would refresh your recollection as to why you
15 were receiving this money or where it was sent?

16 A Ask the question again, please.

17 Q Are there documents you could refer to
18 to refresh your recollection as to why you were
19 receiving the money and where it was sent?

20 A Other than my checkbook, no.

21 Q Okay.

22 A I mean, obviously I could go back and
23 look at my checkbook, the register, but other than
24 that, no.

25 Q To see -- of those three different

1 accounts, to see where the money was transferred
2 to?

3 MR. COFFING: Answer his question.

4 I'm sorry.

5 THE WITNESS: What's the question?

6 BY MR. EDWARDS:

7 Q Well, you said you -- I think you would
8 look at your --

9 A I mean, I could if I had to, yeah.

10 Q And you would look at those three
11 different accounts that we talked about?

12 A Uh-huh.

13 Q No other accounts that this money could
14 have been transferred to?

15 A No.

16 Q Okay. Could you please just state and
17 spell your name for the record.

18 A Rhonda, R-H-O-N-D-A, middle name Helene,
19 H-E-L-E-N-E, last name Mona, M-O-N-A.

20 Q Have you ever had your deposition taken
21 before?

22 A Yes.

23 Q Have you ever had a judgment debtor
24 examination taken before?

25 A I'm pretty sure, I think. It was either

1 a deposition or a judgment debtor exam.

2 Q And do you remember how many times
3 you've had either your deposition or a judgment
4 debtor examination taken?

5 A A couple, two or three.

6 Q Okay. Recently?

7 A The last one was with Al Lissoy a few
8 years ago before this -- before the judgment.

9 Q Oh, I see. It was part of the
10 underlying case?

11 A Uh-huh.

12 Q Okay. Well, I just want to go over some
13 of the ground rules I'm sure you've heard before,
14 some that we've already discussed. But because
15 the court reporter is taking down everything we
16 say, we need to work hard to speak clearly so she
17 catches everything.

18 Like I mentioned before, if you can wait
19 for me to finish asking my question, I would
20 appreciate it. And I will do my best -- and
21 please remind me if I don't do it -- to wait until
22 you're done answering before I start asking my
23 next question, because she can only record one of
24 us at a time.

25 Again, no -- no "uh-huh" or "huh-uh,"

1 because it's not picked up very clear on the
2 transcript. The same with if you can avoid
3 nodding your head, I would appreciate it.

4 You understand that the oath that you
5 took at the beginning of this deposition is the
6 same oath you would take in a court of law; right?

7 A Yes.

8 Q And that oath carries with it the same
9 penalty of perjury as it would if you were in a
10 court of law.

11 A Yes.

12 Q Okay. Regarding the questions I ask, I
13 expect that your answers will be full and
14 accurate; is that fair?

15 A Yes.

16 Q And if you don't understand a question,
17 you understand you can ask me to rephrase it or
18 repeat it; right?

19 A Yes.

20 Q But if you answer my question, I'm going
21 to assume that you understood my question. Is
22 that fair?

23 A Fair.

24 Q When the examination is complete, the
25 court reporter will type up everything we've said

1 into a booklet, and you'll have an opportunity to
2 review it if you would like to make any
3 corrections and sign it to verify that it's
4 accurate.

5 Do you understand that?

6 A Yes.

7 Q And to the extent that you make any
8 changes at a future proceeding, I can comment
9 about those changes.

10 Do you understand that?

11 A Yes.

12 Q If you need a break at any point, please
13 let us know. This is not an endurance contest. I
14 do want to make sure that we finish everything up
15 today, because I don't want to waste any of your
16 time, but don't hesitate to let me know if you
17 need a break, go to the restroom, get a drink,
18 anything.

19 A Okay.

20 Q Any illnesses or substances, medications
21 that you may be on today that could affect your
22 ability to testify?

23 A No.

24 Q Any reason you can't answer my questions
25 fully and accurately?

1 A No.

2 Q Okay. And I'm going to try to save some
3 time, and I hope this works, but when I'm talking
4 about your assets, if I say "you" or "your
5 assets," I guess with the permission of your
6 counsel, I hope we can understand that that means
7 you individually, your husband individually, you
8 as a -- as a community property estate, the Mona
9 Family Trust, or any entity in which you, your
10 husband, or the trust holds an interest.

11 I can break it down into individual
12 questions if you want, but, gosh, that's going to
13 take a long time. And we can always drill down or
14 you can clarify your answers if necessary, but I
15 was hoping to start with that ground rule to speed
16 up the process.

17 MR. COFFING: The only caveat to
18 that, what is or is not community property calls
19 for a legal conclusion. So I hate to put the
20 burden on her to say this is community and this is
21 not. So to the extent that you know about an
22 asset with those qualifications, you can answer.

23 THE WITNESS: What is the community
24 and what is --

25 MR. COFFING: You don't need to worry

1 about how it's characterized. That's an argument
2 for a later date.

3 BY MR. EDWARDS:

4 Q Right. And my intent was, I'm asking
5 about your individual property, your community
6 property. So regardless of how the law may look
7 at it, I'm asking a broad question. And we can
8 drill down later, but I was hoping that it might
9 save us this time.

10 Is that fair?

11 A Yes.

12 (Exhibit No. 5 was marked.)

13 BY MR. EDWARDS:

14 Q Okay. I'm showing you what's been
15 marked as Exhibit 5.

16 Have you seen this document before?

17 A No.

18 Q Okay. Feel free to take a moment to
19 review, but this is the judgment that Far West
20 Industries, my client, has against Mr. Mona and
21 the Mona Family Trust.

22 Were you aware of this judgment?

23 A I'm aware of it. I've never seen it.

24 Q Okay. Have you made any effort to pay
25 any portion of this judgment?

1 A Have I personally?

2 Q Correct.

3 A No.

4 Q Are you aware if the trust has made any
5 effort to pay any portion of this judgment?

6 A Well, I know we've been trying to.

7 MR. COFFING: He's not talking about
8 settlement discussions.

9 Has any money from the trust been
10 paid? Is that a fair characterization?

11 MR. EDWARDS: Yes.

12 MR. COFFING: Has any money from the
13 trust gone to pay this, that you're aware of?

14 THE WITNESS: That I'm aware of, no.
15 But I wouldn't be involved in anything like that.

16 BY MR. EDWARDS:

17 Q Why is that?

18 A Because I don't do any of that.

19 Q And you don't handle any of the
20 finances?

21 A None.

22 Q Okay. And when you say you don't handle
23 the finances, explain to me what that means.

24 A I pay my house bills, and that's all I
25 do.

1 Q Okay. And you're saying your husband
2 does everything else?

3 A Everything.

4 Q Okay. Are you aware of any efforts made
5 by your husband to pay this judgment?

6 A I'm not aware of.

7 Q Are you aware of any plans to pay this
8 judgment in the future? And I'm not talking about
9 entitlement.

10 MR. COFFING: Well, I just want to --
11 you know, because you've got a writ of garnishment
12 ongoing, which is paying the judgment. I don't
13 know if she's aware of that or not.

14 THE WITNESS: I don't even know that.
15 BY MR. EDWARDS:

16 Q Okay. And if the answer is "I don't
17 know," that's fine. But my question is, are you
18 aware of any plans to pay this judgment?

19 A I'm not aware of anything.

20 Q Okay. And just to make sure I
21 understand.

22 You're not aware of any plans to pay
23 this judgment, Exhibit 5?

24 MR. COFFING: Go ahead.

25 THE WITNESS: Am I aware of anything?

1 No. I'm not -- am I aware? The answer is no.

2 MR. EDWARDS: Thank you.

3 (Exhibit No. 6 was marked.)

4 BY MR. EDWARDS:

5 Q Just as a warning, at the end of the
6 deposition, the court reporter is going to need to
7 take all of those with her, all of those exhibits.
8 Okay? But your counsel will have a copy, so --

9 MR. COFFING: Yeah, I've got copies.

10 BY MR. EDWARDS:

11 Q Ma'am, I'm showing you what's been
12 marked as Exhibit 6.

13 Do you recognize this document?

14 A No.

15 Q You've never seen this document before?

16 A No.

17 Q I'll represent to you that this is an
18 order for you to show up today, although the date
19 has been changed to accommodate you and your
20 counsel.

21 If you'd turn to page four of Exhibit 6,
22 you'll see some definitions and then a list
23 continuing on the rest of the document of items to
24 be produced.

25 You've never seen this list before?

1 MR. COFFING: Page four is
2 definitions.

3 MR. EDWARDS: Yeah, and continuing on
4 to the next page --

5 MR. COFFING: Oh, yeah. I'm sorry.
6 I didn't hear you say that.

7 THE WITNESS: No.

8 BY MR. EDWARDS:

9 Q You have never seen this list before?

10 A No.

11 Q Did you make any efforts to gather any
12 documents in response to this order?

13 A Me personally? No, but --

14 MR. COFFING: You can answer.

15 (Exhibit No. 7 was marked.)

16 BY MR. EDWARDS:

17 Q I'm showing you what's been marked as
18 Exhibit 7.

19 Have you ever seen this document before?

20 A Yes.

21 Q What is it?

22 A I read it in an e-mail yesterday.

23 Q Okay. And I'll represent to you this is
24 a letter I received from your attorney responding
25 to that list of documents requested in Exhibit

1 No. 6, the order to be here today. So I just want
2 to walk through it to make sure that we agree with
3 all of the statements that are made in this
4 letter. Is that okay?

5 A Yes.

6 Q On the first page, under response as it
7 relates to request No. 1, the letter reads, "The
8 only asset in the trust is the Red Arrow
9 residence."

10 Do you see that?

11 A I do.

12 Q Is that an accurate statement?

13 A I'm reading it as you are. I mean, I --
14 I think so. I really never read a copy of the
15 trust, I don't think.

16 Q You believe that's accurate?

17 A Yes.

18 Q Okay. And when this letter refers to
19 "the trust," you understand it's referring to the
20 Mona Family Trust?

21 A Yes.

22 Q And the Red Arrow residence, what is
23 that?

24 A It's my home.

25 Q Okay. And what's the address?

1 A 2793 Red Arrow drive.

2 Q No unit number; correct?

3 A No.

4 Q How long have you owned that residence?

5 A Twelve years.

6 Q Has the residence always been in the
7 name of the trust?

8 A I don't know.

9 Q But your understanding is --

10 A I'm pretty sure.

11 Q -- that it's always been in the name of
12 the trust?

13 A I'm pretty sure, but I -- yeah.

14 Q Okay. To your knowledge, does the trust
15 have any interest in any businesses?

16 A No.

17 Q Does the trust have any cash?

18 A You understand, I really don't know
19 about the trust. I mean, I've never read it, so
20 I'm -- but I read this, and it says the only thing
21 in the trust is the Red Arrow house, so I'm going
22 to believe that.

23 Q Okay. Other than reading it here, do
24 you have any basis to understand what assets are
25 in the trust?

1 A No.

2 Q You were a trustee of the trust?

3 A Yes.

4 Q But I understand today you are not a
5 trustee of the trust?

6 A Correct.

7 Q Okay. When did you cease being a
8 trustee of the trust?

9 A Last week.

10 Q Why did you cease being a trustee of the
11 trust?

12 A Because I --

13 MR. COFFING: Hang on. If that's a
14 conversation you had with your husband, I instruct
15 you -- husband or counsel, I would instruct you
16 not to answer.

17 THE WITNESS: Correct.

18 BY MR. EDWARDS:

19 Q Do you know why you ceased to be a
20 trustee for the trust?

21 A No.

22 MR. COFFING: Well, can we make it
23 clear, outside of that limitation, do you know? I
24 don't want to put words in your mouth, but -- she
25 just said no, but I'm not sure that's what you're

1 trying to convey.

2 Other than conversations with
3 counsel --

4 THE WITNESS: Correct. Right.

5 MR. COFFING: -- counsel or your
6 husband, you don't know?

7 THE WITNESS: Correct.

8 MR. COFFING: I don't mean to put
9 words in your mouth, but I want to make sure
10 that's clear.

11 MR. EDWARDS: I appreciate the
12 clarification.

13 BY MR. EDWARDS:

14 Q So if I understand right, you do have an
15 understanding of why you're no longer a trustee to
16 the trust, but your understanding is based solely
17 upon a conversation with your husband and/or
18 counsel?

19 A Correct.

20 Q Are you aware of any assets in the
21 trust, other than the residence, at any point in
22 time in the future -- or, I'm sorry, in the past?

23 A No.

24 Q So you have never had a basis of
25 knowledge about any assets of the trust?

1 A No.

2 Q The next sentence on Exhibit 7 says,
3 "And it carries approximately 2.2 million in
4 debt."

5 Do you see that?

6 A Correct.

7 Q I guess when it's referring to "it," I'm
8 assuming it's talking about your Red Arrow
9 residence.

10 A Correct.

11 Q Is it your understanding that the Red
12 Arrow residence carries approximately \$2.2 million
13 in debt?

14 A Yes.

15 Q What is that \$2.2 million in debt
16 comprised of?

17 A I have no idea.

18 Q You have no idea whatsoever?

19 A No.

20 Q Is it a mortgage associated with the
21 house -- with the property?

22 A Yes.

23 Q Okay. Who pays the mortgage?

24 A It gets paid out of the office.

25 Q Okay. And what does that mean?

1 A It means his assistant from his office
2 pays it. I don't know where it gets paid from.
3 It's not one of the bills that I take care of the
4 house with. I pay utilities, that stuff.

5 Q Okay. So the mortgage is paid through
6 the office.

7 Do you know -- and the office what?

8 A My husband's office?

9 Q Yes.

10 Is it your husband's personal office, or
11 is it associated with a business?

12 A His business office, yes.

13 Q Okay. What business?

14 A CannaVest.

15 Q Can you spell that?

16 MR. COFFING: C-A-N-N-A-V-E-S-T.

17 It's a capital V, I think, too.

18 THE WITNESS: Uh-huh.

19 BY MR. EDWARDS:

20 Q Okay. And you believe your husband's
21 assistant at the CannaVest office pays the
22 mortgage?

23 A Correct.

24 Q Who is your husband's assistant at the
25 office?

1 A Kathleen.

2 Q Do you know Kathleen's last name?

3 A Kelleher.

4 Q Can you spell that for me?

5 A No.

6 Q So you are aware that there is a
7 mortgage against the property?

8 A Yes.

9 Q Okay. Are you aware of what other kind
10 of debt may be associated with the Red Arrow
11 residence?

12 A No. There was a second mortgage, but
13 that was paid.

14 Q Do you know the balance of the mortgage?

15 A No.

16 Q Approximately?

17 A No.

18 Q Not even approximately?

19 A Well, this says 2.2. I mean, I don't
20 know.

21 Q So that's your best guess, is
22 2.2 million?

23 A That would be my best guess, is it says
24 that, but I don't know.

25 Q If you could turn to page three, please,

1 of Exhibit 7. In response to question No. 9, do
2 you see the sentence that says, "The trust does
3 not own or lease any automobiles, trucks,
4 trailers, and/or other vehicles"?

5 A Yes.

6 Q And to your knowledge, is that a correct
7 statement?

8 A To my knowledge.

9 Q But you're not sure whether the trust
10 holds any other assets?

11 A I'm reading that it doesn't.

12 Q And for that reason, you believe it's
13 accurate?

14 A Correct.

15 Q Do you have any other reason to believe
16 it's accurate --

17 A No.

18 Q -- other than reading it today?

19 A No.

20 Q How did you get here today?

21 A I drove.

22 Q Okay. What did you drive?

23 A My husband's car.

24 Q Okay. How did your husband -- did your
25 husband go to work today?

1 A He's in Germany.

2 Q Okay. You have one vehicle between the
3 two of you?

4 A No.

5 Q Okay. What other vehicles do you have?

6 A I have my car.

7 Q Okay.

8 A I have a Jaguar. It's in San Diego.

9 Q Okay. I love Jaguars.

10 What kind?

11 A A white one.

12 Q Do you know the model?

13 A It's a white convertible, two doors.

14 Q Okay. So does that make it an XK?

15 A It could be.

16 Q I'm shopping, so --

17 A It could be. I don't know. I know it's
18 white and cute.

19 Q Okay. What year is it?

20 A I got it a year ago.

21 Q Okay. Did you purchase it or lease it?

22 A I purchased it.

23 Q Okay. Purchased it with -- did you take
24 out a loan for it?

25 A I don't think so.

1 Q You believe you paid all cash for it?

2 A My husband took care of it, so I really
3 don't know.

4 Q So your husband bought you a car?

5 A I don't know. He took care of the
6 financing.

7 Q Okay. You're not exactly sure where
8 money came from?

9 A Exactly.

10 Q But you believe it was paid for in cash?

11 A I think so.

12 Q And you bought it new?

13 A No. I think it was -- I can't remember
14 if it was slightly used or new.

15 Q But close to new.

16 Do you know what year it is, by chance?

17 A 2014, probably.

18 Q And you said it's in San Diego?

19 A Uh-huh.

20 Q Has it always been in San Diego?

21 A I purchased it here, and then --

22 Q And then drove it to San Diego?

23 A I drive it back and forth. It's my
24 own -- it's my car.

25 Q Understood.

1 A Yeah.

2 Q So I guess last time you went to San
3 Diego, you flew back -- you drove there and flew
4 back?

5 A I do it so often, I don't remember what
6 is what. I just -- I can't remember if I flew in.
7 When did I get here? When did I get here? I got
8 here for Mom's surgery. Oh, I drove. I drove. I
9 drove Michael's car.

10 Q You drove -- okay. So you drove the
11 Jaguar there and Michael's car back?

12 A Yeah. We switch around all the time.
13 Yeah.

14 Q And where is that car stored?

15 A Which car?

16 Q The Jaguar.

17 A It's in San Diego.

18 Q Okay. Is it at the --

19 A It's in my son's parking spot right now.

20 Q Okay. At the condo we spoke about
21 earlier on what was -- what was the street name?

22 A Island Avenue.

23 Q Ireland Avenue?

24 A Island Avenue.

25 Q Okay. Is that a -- is that a gated

PART A

PART A

1 parking spot? Is it something --

2 A Uh-huh.

3 Q Yeah?

4 A Uh-huh.

5 Q Okay. Any other vehicles that you or
6 your husband have?

7 A No.

8 Q Do you own any boats?

9 A I don't know. Well, do I? I don't know
10 who does.

11 Q Again, I'm trying to use "you" in that
12 broad sense, so, you know, you, your husband, the
13 trust --

14 A Oh, no. I think I sold it a while ago,
15 a ski boat.

16 Q A ski boat?

17 A Yeah. I sold it. I did.

18 Q When did you sell it?

19 A I don't know. A few years ago.

20 Q What kind of boat?

21 A It was an old ski boat.

22 Q Is that something -- when you say a ski
23 boat, you mean you tow a water skier behind you?

24 A Yes.

25 Q Okay. Do you know what year the boat

1 was?

2 A It was ancient, so I really don't.

3 Q And who technically owned the boat, to
4 the best of your recollection?

5 A I did.

6 Q You owned it individually?

7 A Uh-huh.

8 Q Okay. Any other boats that you --

9 A No.

10 Q -- your husband, the trust, any entities
11 that you guys have an interest in, hold?

12 A No.

13 Q And you said you sold it a few years
14 ago.

15 A Uh-huh.

16 Q You've got to guess for me, is that
17 sometime prior to 2010?

18 A Probably about four years ago, maybe.
19 Four or five years ago.

20 Q So maybe 2011, somewhere in that range?

21 A Somewhere in there.

22 MR. COFFING: Tom, we're almost at an
23 hour.

24 Can we take a quick break?

25 MR. EDWARDS: Absolutely.

1 (Whereupon, a recess was taken.)

2 BY MR. EDWARDS:

3 Q On the break, did you speak with your
4 attorney?

5 A Yes.

6 Q About what?

7 A I don't need to answer that, do I?

8 MR. COFFING: Yeah, you can talk --
9 you can say we talked generally about your
10 testimony.

11 THE WITNESS: There you go.

12 BY MR. EDWARDS:

13 Q Okay. What do you recall discussing?

14 MR. COFFING: Well, we're not going
15 to get into specifics.

16 THE WITNESS: Isn't that
17 attorney-client privilege?

18 MR. COFFING: Yeah, hang on. There's
19 a case out there now that is subject to some
20 interpretation, but I'll instruct her not to
21 answer.

22 BY MR. EDWARDS:

23 Q Okay. Does your husband owe you any
24 money?

25 A I don't know.

1 Q You don't think -- I mean, are you aware
2 of him owing you any money?

3 A I always feel like he owes me money. I
4 don't know.

5 Q Okay. Has your -- do you know if your
6 husband has ever owed you money in the past?

7 A Over 32 years? I'm sure he has. I
8 don't -- I don't know.

9 Q You know, like 20 bucks here or there
10 because he borrowed it from your wallet, or are we
11 talking about something more substantial?

12 A I don't know.

13 Q You don't recall any circumstance where
14 your husband owed you money? I'm sorry? One more
15 time?

16 A Doesn't he owe me half of everything?
17 Isn't it community property?

18 Q That's a fair statement.

19 So aside from community property --

20 A I don't think he's ever owed me money.
21 I don't know. To the best of my knowledge, no.

22 Q Okay.

23 A I don't know.

24 MR. COFFING: That's fine.

25

1 BY MR. EDWARDS:

2 Q You don't own an RV?

3 A No.

4 Q Any off-road vehicles?

5 A No.

6 Q Any Sea-Doos? Water skis?

7 A No.

8 Q Have you ever owned any of those?

9 A Fifteen years ago.

10 Q Okay. And what happened -- what did you
11 own?

12 A I owned four-wheelers and snowmobiles.

13 Q Okay. And what happened to those?

14 A Lost them in a bankruptcy. I don't
15 know. Sold them. I don't remember.

16 Q If you could -- going back to Exhibit 7,
17 turn to page four, please.

18 A Page what?

19 Q Four. It's marked up in the top left.
20 Are you there?

21 A Uh-huh.

22 Q Okay. And you'll see request No. 13,
23 it's asking for documents relating to tangible or
24 intangible property. It talks about furnishings,
25 furniture, musical instruments.

1 Do you see that language?

2 A Yes.

3 Q And below that, do you see the response,
4 "The trust does not hold any interest in any
5 tangible or intangible property"? Do you see
6 that?

7 A Yes.

8 Q To the best of your knowledge, is that
9 an accurate statement?

10 A Yes.

11 Q Okay. Well, who owns the furnishings in
12 your home?

13 A I don't -- I assume I do, but --

14 MR. COFFING: Yeah, if I -- if I may,
15 Tom, we drafted this. I guess I'll talk to Tye,
16 but I'm assuming we weren't taking about
17 furniture, I guess. So maybe if that needs to be
18 corrected, we can do that, but -- I mean, I didn't
19 get down to who owns the couch. That was not, I
20 think, the intent of this, but she can answer.

21 You can answer questions.

22 I guess if it's furniture in the
23 house and the trust owns the house, we didn't
24 parse it like that, and maybe we should have. I
25 don't know if that's what you're looking at.

1 MR. EDWARDS: Yeah, I would like to
2 clarify that just so I can figure out, where I
3 guess title to the -- the personal property inside
4 the house belongs.

5 MR. COFFING: Okay. Go ahead.

6 BY MR. EDWARDS:

7 Q So do you know who owns the furnishings
8 inside your house?

9 A I thought you had clarified that we
10 weren't getting into the nitty-gritties of who
11 owns it, me, Michael, the trust.

12 Q Well, you're right. For my broad
13 questions, you're absolutely right, and I
14 appreciate that. But there are occasions where
15 we're going to drill down and figure out who
16 actually owns what.

17 A I have no idea. My house owns them. I
18 don't know. I mean, they have been in there
19 forever.

20 Q Okay. Have you in the past four years
21 sold any personal property inside your house?

22 A No.

23 Q Have you in the past four years
24 otherwise transferred any personal property within
25 your house to somebody else?

1 A No.

2 Q Same page on Exhibit 7, down towards the
3 bottom, Response No. 15, you see the statement
4 that says "No person or entity loaned the trust
5 any moneys and nothing was financed on behalf of
6 the trust"?

7 Do you see that?

8 A I see that, yes.

9 Q To your knowledge, is that an accurate
10 statement?

11 A To my knowledge, yes.

12 Q Okay. So the trust has never borrowed
13 money from anybody?

14 A To my knowledge, no.

15 Q And --

16 MR. COFFING: Well, other than the
17 mortgages we talked about earlier that encumber
18 the property? I mean, that's the -- that's a fine
19 line there.

20 MR. EDWARDS: And I guess, Terry, as
21 I understood the response, you're saying the trust
22 owns the property, but is not a borrower on any
23 document.

24 MR. COFFING: And, again, I'll --

25 THE WITNESS: Well, the Bank of

1 Nevada owns the house, in reality.

2 MR. COFFING: There's a -- I haven't
3 looked at the loan documents for the mortgage, but
4 I would imagine that the trust is named along with
5 individuals, so maybe that needs to be changed.
6 I'll find out if that's a concern.

7 MR. EDWARDS: I appreciate that.
8 Yeah, I would like to know.

9 MR. COFFING: Okay. I will look
10 at -- I mean, they're recorded notes, you're well
11 aware of that. I didn't see any applications,
12 though, so I don't know how those applications
13 came out.

14 BY MR. EDWARDS:

15 Q So to your knowledge, the trust has
16 never borrowed any money; correct?

17 A Well, we borrowed money to buy the
18 house.

19 Q Okay.

20 A And still owe it.

21 Q Okay. Other than borrowing money to
22 purchase the house, are you aware of the trust
23 borrowing money?

24 A I'm not aware, no.

25 Q Are you aware of the trust loaning

1 anybody money?

2 A I'm not aware of that.

3 Q Turn to the next page, please, page five
4 of Exhibit 7. And the response to No. 17, it says
5 "There are no policies of insurance issued in the
6 name of the trust."

7 Do you handle anything related to
8 insurance in your family?

9 A No. Health insurance.

10 MR. COFFING: And, again, Tom, I'll
11 check the homeowner policy, because they would
12 probably -- loss payees, I would imagine, with the
13 bank.

14 MR. EDWARDS: Yeah, that's what I
15 was --

16 MR. COFFING: Yeah, I can -- I can
17 check on that, and I apologize for that.

18 BY MR. EDWARDS:

19 Q Other than -- did I hear you say that
20 other than the health insurance policy, you don't
21 handle insurance as it relates to your family?

22 A No.

23 Q Are you aware of any other insurance
24 policies?

25 A No.

1 Q And I'm using -- that's a broad question
2 as it relates to the trust.

3 As it relates to you, your husband, are
4 you aware of --

5 A I mean, I would assume we have home
6 insurance, I mean, you know.

7 Q Okay. Any other policies you can think
8 of?

9 A No.

10 Q I just want to make sure we speak up
11 loud enough so the court reporter can pick it up.

12 Page six, please, of Exhibit 7. Down at
13 the bottom, very last response, it says "The Red
14 Arrow property is the only asset in the trust, and
15 the trust is not responsible for payment of the
16 note or the regularly occurring bills on the
17 property."

18 Do you see that?

19 A Yes.

20 MR. COFFING: I'm sorry. Which one
21 are you? 24?

22 MR. EDWARDS: Are you there, Terry?

23 MR. COFFING: Yes.

24 BY MR. EDWARDS:

25 Q To your knowledge, who is responsible to

1 pay the note on the --

2 A Well, like I said, it's paid out of his
3 office.

4 Q Okay. You're not quite sure what
5 account that comes out of?

6 A I'm not sure.

7 Q And the sentence also refers to
8 regularly occurring bills on the property.

9 Do you see that?

10 A Yes.

11 Q And if I understand your prior
12 testimony, those regularly occurring bills come
13 out of your Bank of Nevada account; right?

14 A Correct.

15 Q Just to flesh that out a little bit,
16 what regularly occurring bills do you pay out of
17 the Bank of Nevada account?

18 A Water, sewer, electricity.

19 Q Cable?

20 A Cable, DirecTV, all of those.

21 Q Okay. Any debts that you're servicing
22 out of that account?

23 A What do you mean?

24 Q Meaning you or somebody owes somebody
25 else money -- like a mortgage, for example -- and

1 you pay a monthly amount to pay down the debt.

2 A No.

3 Q So these are simply the monthly
4 recurring bills? You're not paying off any debt?
5 You're not making investments out of the Bank of
6 Nevada account?

7 A Correct.

8 Q If you could turn to page seven of
9 Exhibit 7, under No. 25, it says "The trust does
10 not have any retirement accounts, pension plans,
11 profit-sharing plans, or SEP accounts or the like
12 associated with it."

13 Do you see that?

14 A Yes.

15 Q Do you personally have any retirement
16 accounts, pension plans, profit-sharing plans, or
17 other similar accounts?

18 A No.

19 Q Do you know if your husband does?

20 A I have no idea.

21 Q Do you have plans for retirement?

22 A I'm retired.

23 Q Do you have plans on how to fund your
24 retirement?

25 A No.

1 Q Next response down, No. 26, it says "The
2 trust has not sold, assigned, transferred, or
3 conveyed any tangible or intangible property."

4 Do you see that?

5 A Uh-huh, yes.

6 Q To the best of your knowledge, is that
7 an accurate statement?

8 A To the best of my knowledge, yes.

9 Q Okay. But you're not sure one way or
10 the other?

11 A I don't even know if I understand the
12 question. Wait, the trust has not sold,
13 assigned -- best of my knowledge, that's correct.

14 Q No. 27, the response to that says "The
15 trust is not associated with any other trust."

16 A Correct.

17 Q Do you see that? Is that an accurate
18 statement?

19 A Yes. To the best of my knowledge, yes.

20 Q Okay. Do you have an association with
21 any other trust?

22 A No.

23 Q Do you know if your husband has an
24 association with any other trust?

25 A I have no idea what my husband has an

1 association with.

2 Q Do you know if your children have an
3 association with any other trust?

4 A I don't know. Yes, my children have a
5 trust.

6 Q Okay. What's the name of that trust?

7 A Mik-Nik or Nik-Mik, one of those.

8 MR. COFFING: M-I-K-N-I-K.

9 MR. EDWARDS: With a dash in between.

10 BY MR. EDWARDS:

11 Q What's the purpose of the Mik-Nik trust?

12 A I honestly don't know what's in there or
13 what it pays. I don't have any association with
14 it.

15 Q You don't have any interest in that
16 trust?

17 A What do you mean by "interest"? I care
18 about my children, but I have never had anything
19 to do with it.

20 Q Okay. Are you a trustee of that trust?

21 A I don't know.

22 Q Are you a beneficiary of that trust?

23 A I don't think so.

24 Q You have no idea what assets may be in
25 that trust?

1 A I have no idea.

2 Q Who would know?

3 A My husband.

4 Q Okay. Anybody else?

5 A Possibly my son. Probably my son.

6 Q Would your daughter know what was in the
7 trust?

8 A I don't think so, no.

9 Q Anybody else that you can think of that
10 would know what's inside of that trust?

11 A No.

12 Q And I take it your son and your husband
13 would also know the details associated with how
14 that trust was formed and why?

15 MR. COFFING: To the extent it calls
16 for speculation as to what they know, I would
17 interpose an objection, but -- she doesn't know.

18 THE WITNESS: What was the question?

19 BY MR. EDWARDS:

20 Q The people that would know why the trust
21 was formed would be your husband and your son;
22 correct?

23 A My husband would know.

24 MR. COFFING: Some attorney probably
25 drafted it, but --

1 THE WITNESS: Right.

2 BY MR. EDWARDS:

3 Q And in preparation for this judgment
4 debtor exam, did you do anything to prepare?

5 A No.

6 Q Did you meet with your --

7 MR. COFFING: You met with counsel.

8 THE WITNESS: Well, yeah, I met with
9 counsel.

10 MR. COFFING: She obviously doesn't
11 remember much of it, but --

12 THE WITNESS: I'm sorry.

13 MR. COFFING: That's all right.

14 BY MR. EDWARDS:

15 Q Did you review any materials in
16 preparation for the judgment debtor examination?

17 MR. COFFING: Tell him, yeah.

18 THE WITNESS: Well, yes.

19 BY MR. EDWARDS:

20 Q Okay. What did you review?

21 A What did I review? That's how good my
22 memory is.

23 MR. COFFING: I'm just going to show
24 her, because --

25 THE WITNESS: Yeah, (indicating).

1 BY MR. EDWARDS:

2 Q You reviewed Exhibit 1, which is the
3 post-marital agreement; right?

4 A Uh-huh.

5 Q All right. What else did you review?

6 A Was that it?

7 MR. COFFING: You have to answer. I
8 can't answer.

9 THE WITNESS: I can't remember.
10 Okay. Oh, and -- and the -- this that I'm looking
11 at.

12 BY MR. EDWARDS:

13 Q The letter, Exhibit 7?

14 A Yes.

15 Q Okay. Any other documents that you can
16 recall reviewing?

17 A I don't recall any others.

18 Q Did you discuss your judgment debtor
19 examination with anybody, other than counsel?

20 A No.

21 Q Did you discuss it with your son?

22 A No.

23 Q Did you discuss it with any friends?

24 A No.

25 Q Where do you live?

1 A At 2793 Red Arrow.

2 Q Do you have any other addresses?

3 A Well, yes. I -- I live somewhat in San
4 Diego.

5 Q Okay. What address do you live in San
6 Diego?

7 A 877 Island Avenue.

8 Q And in what unit number?

9 A 1101.

10 Q So that's different than your son's
11 unit?

12 A Correct.

13 Q But the same building?

14 A Correct.

15 Q Do you rent or own the property here in
16 Las Vegas?

17 A Well, the trust owns the one here in
18 Las Vegas.

19 Q Okay. What about the property in San
20 Diego?

21 A It's rented.

22 Q Rented.

23 Rented from whom?

24 A I don't know.

25 Q Do you pay rent?

1 A I would -- I don't know. My husband
2 handles it.

3 Q Okay. What's your phone number?

4 A My cell?

5 Q If you can start with your home number
6 at Red Arrow.

7 A (702) 242-6662.

8 Q Okay. And then your phone number in San
9 Diego?

10 A I haven't got a clue.

11 Q And could you give me your cell phone
12 number, as well?

13 A 702 --

14 MR. COFFING: These will be kept
15 private, obviously?

16 MR. EDWARDS: Of course.

17 THE WITNESS: (702) 355-2223.

18 MR. COFFING: And, Tom, can I ask
19 that that includes your client. I think
20 Mr. Lissoy has Mike's cell phone number, but --

21 THE WITNESS: Oh, you can't give
22 him --

23 MR. COFFING: To the extent he --
24 Mr. Lissoy doesn't need to know her phone number;
25 is that fair? I don't want to get any phone

1 calls, is what I'm saying.

2 MR. EDWARDS: How about I will advise
3 my client not to call the phone numbers.

4 MR. COFFING: Fair enough.

5 MR. EDWARDS: Is that fine?

6 MR. COFFING: Yeah, that's fine.

7 BY MR. EDWARDS:

8 Q And are you married; correct?

9 A Correct.

10 Q To whom?

11 A Michael Mona.

12 Q Junior; right?

13 A Junior.

14 Q And you've been married for 32 years?

15 A Correct.

16 Q What's your spouse's occupation?

17 A He is CEO of CannaVest.

18 Q Does he do anything else for a living?

19 A No.

20 Q Is he the CEO of CannaVest full time?

21 A Yes.

22 Q When did he -- when was CannaVest his
23 full-time employer?

24 A A few years ago.

25 Q Can you give me an estimate?

1 MR. COFFING: No, that's all right,

2 if you know --

3 THE WITNESS: Three -- I know about
4 three years ago.

5 BY MR. EDWARDS:

6 Q And before that, what was your husband's
7 occupation?

8 A He was a -- what do you call that when
9 you -- MJM -- MJ&A, whatever it's called, yeah.

10 Q And what was he doing with MJ&A?

11 A He was, you know, giving them advice and
12 stuff.

13 Q Consulting?

14 A Thank you. That's the word.

15 Q Where is your husband currently
16 employed? I mean --

17 A Employed?

18 Q I'm talking about locally, actually. I
19 know he's employed at CannaVest, but where? Here
20 in Las Vegas?

21 A Oh, here in Las Vegas.

22 Q Does he spend most of his time here in
23 Las Vegas?

24 A It's split.

25 Q Split between where?

1 A Here and San Diego.

2 Q Okay. And if you had to put a
3 percentage on it, can you estimate for me?

4 A 50/50.

5 Q Okay. Is that the same for you, as
6 well, you spend about 50/50 of your time here and
7 in San Diego?

8 A I spend more of my time here.

9 Q Okay. And why is that?

10 A Because this is my home.

11 Q So you're probably 60/40, Las Vegas to
12 San Diego?

13 A It differs all of the time. 70/30
14 sometimes.

15 Q Okay. We spoke briefly about your
16 children.

17 You have two children; right?

18 A Correct.

19 Q One Michael Mona, III?

20 A Correct.

21 Q He's 29?

22 A Correct.

23 Q And your other child?

24 A Nicole.

25 Q Okay. And how old is Nicole?

1 A Twenty-six.

2 Q Does she still have -- is Mona still her
3 last name?

4 A Correct.

5 Q Where does she live?

6 A San Diego.

7 Q Okay. Does your son live in San Diego
8 full time?

9 A Yes.

10 Q At the Island address?

11 A Correct.

12 Q 701 unit number?

13 A Correct.

14 Q Where does your daughter live?

15 A In San Diego.

16 Q With her brother?

17 A No.

18 Q Somewhere else?

19 A Uh-huh.

20 Q Okay. Do you know where?

21 A Yes.

22 Q Okay. Can you give me an address?

23 A Do I have to give you an address of
24 where my daughter lives? No.

25 MR. COFFING: She's lives in San

1 Diego.

2 THE WITNESS: She rents, she doesn't
3 own, and it's none of anyone's business where my
4 daughter lives.

5 BY MR. EDWARDS:

6 Q And I appreciate it, but there's a lot
7 of transfers between family members here, and I
8 would like to know her address. You can tell me
9 no, but --

10 A I'm not going to give you her exact
11 address.

12 Q Okay. Is your son employed?

13 A Yes.

14 Q What does he do for work?

15 A He works at CannaVest.

16 Q What does he do for them?

17 A I think his job title is head of product
18 development, but I -- I'm not positive.

19 Q Okay. And what does he actually do day
20 to day?

21 A I don't know.

22 Q Have you ever spoken to him about it?

23 A Yeah, he tells me little things here and
24 there, but I don't -- I don't get involved in the
25 business.

1 Q Do you have a sense of what he does,

2 even though you may not know specifics?

3 A Well, he's -- no. I would be guessing.

4 Q Is your daughter employed?

5 A No. She's a full-time student.

6 Q Where at?

7 A USD. She's in her master's program

8 there.

9 Q Okay. What's she getting her master's

10 in?

11 A Special Ed.

12 Q So you've been unofficially retired for

13 approximately the last five years?

14 A Correct.

15 Q And when did you start doing design

16 work?

17 A About 20 years ago.

18 Q Okay. It sounds to me like you were

19 more of an independent contractor.

20 A Correct.

21 Q Nobody has employed you during that

22 period of time?

23 A Correct.

24 Q You've been hired on specific jobs?

25 A Correct.

1 Q Specific projects?

2 A Correct.

3 Q Do you recall the last time you had an
4 employer?

5 A Well, I worked for my husband a lot, but
6 I don't know that I was getting exactly paid,
7 right.

8 Q Do you get paid sometimes when you work
9 for your husband?

10 A I get a monthly check.

11 Q Okay.

12 A For -- not for very much, but ...

13 Q Okay. And where does that monthly check
14 go?

15 A Where does it go?

16 Q Yeah. What -- like I'm saying, what
17 bank account is that checked deposited?

18 A It goes into my personal account.

19 Q And which account is that?

20 A The Bank of George.

21 Q The checking account?

22 A Yes.

23 Q Okay. So you get paid -- you get a
24 regular check from your husband?

25 A Well, I write it to myself, actually.

1 **Q Okay.**

2 **A So I don't know.**

3 MR. COFFING: You missed an employer.

4 I want you to be accurate. You --

5 THE WITNESS: No, I really don't have
6 an employer. I'm getting too complicated.

7 MR. COFFING: He asked if you ever
8 had an employer.

9 THE WITNESS: Ever? School district
10 years ago.

11 MR. COFFING: There you go, that's
12 what I wanted to get at.

13 BY MR. EDWARDS:

14 **Q Okay. And when were you employed by the**
15 **school district?**

16 **A Thirty years ago. Twenty-nine years**
17 **ago.**

18 **Q Okay. When did you stop being employed**
19 **by the school district?**

20 **A When my son was born.**

21 **Q So roughly 29 years ago?**

22 **A Twenty-nine years ago.**

23 MR. COFFING: I just want to make
24 sure. Day school, tell him --

25 THE WITNESS: Yeah. Yeah.

1 MR. COFFING: That was an employer.

2 Tell them about that.

3 THE WITNESS: No, that was subbing.

4 MR. COFFING: Okay. They're still
5 your employer.

6 THE WITNESS: Okay. So for -- like
7 until my kids were in eighth grade, I subbed,
8 also.

9 BY MR. EDWARDS:

10 Q Okay. So you stopped being a full-time
11 employee roughly 29 years ago when your son was
12 born?

13 A Correct.

14 Q But you continued on to work as a
15 substitute teacher?

16 A Yes.

17 Q For roughly how long?

18 A Twelve more years.

19 Q Okay. So you stopped working with the
20 school district roughly 17 years ago?

21 A When my daughter left eighth grade, so
22 whatever year that was.

23 Q Okay. Any other employers since the
24 school district?

25 A No. Not full-time employer, no.

1 Q Okay. Have you been a part time -- have
2 you had a part time --

3 A Well, just like if I do someone -- if I
4 do work for someone.

5 Q Like project work?

6 A Exactly.

7 Q Okay. Now, I want to go back to the
8 checks that you write yourself from your husband.

9 Is that for work you perform?

10 A Yeah.

11 Q Okay. And where do you write the check
12 from?

13 A I write it from my Bank of Nevada
14 checking account.

15 Q To where?

16 A To myself, and I put it in my own
17 personal checking account.

18 Q The Bank of George checking account?

19 A Yes.

20 Q Okay. And is there a set amount that
21 you write yourself?

22 A Yes.

23 Q How much?

24 A 2600 a month.

25 Q And how did you arrive at that figure?

1 A I don't even know.

2 Q And what does that money represent?

3 A It's just money that I can spend on
4 whatever.

5 Q Okay. I don't want to -- put a negative
6 term on it, but it almost sounds like it's an
7 allowance.

8 A That's correct.

9 Q Not necessarily because you did work,
10 but because you need spending money.

11 A Right. Yeah. Correct.

12 Q Is there anything else to that?

13 A No, that's fine.

14 Q I'm not here to mischaracterize. I want
15 to hear your story, so --

16 MR. COFFING: Nothing. I was going
17 to make a snide comment, but ...

18 BY MR. EDWARDS:

19 Q And the money from the Bank of Nevada
20 account, I thought that was funded by your --

21 A It is.

22 Q -- money market account at the Bank of
23 George.

24 A It is.

25 Q And it has other sources of funds as

1 well; right?

2 A Say that again.

3 Q The Bank of Nevada checking account has
4 other sources of funds as well?

5 A The Bank of Nevada checking account is
6 only funded by the Bank of George.

7 Q Okay. So is -- I'm getting a little
8 confused. So if all of the money in the Bank of
9 Nevada checking account is coming from your money
10 from the Bank of George money market account, and
11 you're just moving money from the Bank of George
12 account into the Bank of Nevada account and then
13 into your other Bank of George account --

14 A Correct.

15 Q -- why does that make sense?

16 A Well, it makes sense to me because it's
17 what I'm allowed to spend, what I give myself to
18 spend versus what I'm spending on my house bills.

19 Q Why wouldn't you just transfer the money
20 from your Bank of George market account to your
21 Bank of George checking account?

22 A Because I -- I'm only allowed to
23 transfer so much money a month before you get
24 charged.

25 Q Okay. From which account?

1 A From the money market account. You're
2 not supposed to transfer money. It's not supposed
3 to be used as a checking account.

4 Q Okay. So you make larger withdrawals
5 from the Bank of George money market account into
6 the Bank of Nevada account?

7 A Correct.

8 Q And then you make monthly payments to
9 yourself from the Bank of Nevada account into --

10 A Correct.

11 Q -- the Bank of George checking account?

12 A Correct. Because the Bank of George
13 checking account is mine to do what I want with,
14 and the Bank of Nevada is only use to pay house
15 bills.

16 Q Okay. And you are solely responsible --
17 your funds are solely responsible for paying the
18 house bills?

19 A Correct.

20 Q Your husband does not contribute to
21 paying the house bills?

22 A No.

23 Q How long have you been writing yourself
24 the check, the \$2,600 a month?

25 A About four years.

1 Q And why did you start that practice?

2 A Because it used to come from his office,
3 and it -- and it didn't anymore.

4 Q Okay. So prior to four years ago, your
5 husband's office would send you a monthly check
6 for 2600?

7 A Yeah. But then when we lost everything,
8 we just restructured however.

9 Q Okay. What do you mean when you lost
10 everything?

11 A When everyone else did, during the
12 recession.

13 Q Okay. So prior to the recession, your
14 husband's office would send you a monthly check
15 for \$2,600?

16 A I don't remember how much it was for.

17 Q Was it generally the same amount?

18 A Somewhere in there.

19 Q Okay. And then after the recession when
20 you restructured, you started this new system
21 where you would take money from your Bank of
22 George money market account, put it in the Bank of
23 Nevada account --

24 A You're being way more specific than I
25 am. So, I mean, somewhere like that, yes.

1 Q Do you receive any bonuses?
2 A No.
3 Q Do you travel often?
4 A Sometimes.
5 Q Okay. It sounds like you travel semi
6 regularly to San Diego.
7 A Oh, yeah.
8 Q What about overseas?
9 A I haven't been overseas in years, since
10 my daughter was in Italy for school.
11 Q And can we put a time frame on that?
12 Your daughter was in school in Italy?
13 A Uh-huh.
14 Q Okay. When was that?
15 A Five years ago, maybe.
16 Q And since that time in Italy, you've
17 never been overseas?
18 A I don't believe so.
19 Q Okay. Did you ever sign any legal
20 documents while you were in Italy?
21 A I don't believe so.
22 Q Did you open any bank accounts in Italy?
23 A No.
24 Q Did you sign any signature cards in
25 Italy?

1 A No.

2 Q Have you been to any other country in
3 which you opened a bank account?

4 A No.

5 Q Never been to Germany?

6 A No.

7 Q Never been to the Cayman Islands?

8 A No.

9 Q Are you aware of any assets held by you,
10 your husband, the trust, or any entity in which
11 you, your husband, or the trust hold an interest
12 that are held overseas?

13 A No.

14 Q Or in Canada?

15 A No.

16 Q Or any other foreign country?

17 A No.

18 Q Do you own any real property other than
19 the Red Arrow property?

20 A Not to my knowledge, no.

21 Q No other property here in Nevada?

22 A I don't believe so.

23 Q Do you own any property in California?

24 A I don't believe so.

25 Q You're not aware of any other property

1 you may own in any other state?

2 A I don't believe so.

3 Q Do you own any commercial buildings?

4 A I don't think so, no.

5 Q And I'm asking that kind of broad
6 question. I'm talking about you, your husband,
7 the trust.

8 A Yeah, I don't think so.

9 Q Have you owned any real property, other
10 than the Red Arrow address, in the last five
11 years?

12 A I don't think so.

13 Q Have you ever owned property in Big
14 Bear?

15 A Yes.

16 Q Do you know the address of the property
17 you owned in Big Bear?

18 A I know the street name. I don't know
19 the address, though.

20 Q What was the street name?

21 A Ironwood.

22 Q Ironwood?

23 A Uh-huh.

24 Q Why do you no longer own the Big Bear
25 property?

1 A We sold it.

2 Q When did you sell it?

3 A About five or six years ago.

4 Q Who did you sell it to?

5 A I don't know.

6 Q Nobody you knew?

7 A I don't know. My husband did the
8 transaction, so I don't know.

9 Q Are you aware of any other real property
10 you've owned in the last five years?

11 A I had a house in Laguna but lost it.

12 Q Okay. Do you know the address of the
13 house in Laguna?

14 A It was on Crescent Bay.

15 Q Why did you lose the house?

16 A When the economy crashed. Same reason
17 we sold Big Bear.

18 Q Okay. Did you -- so you sold the house
19 in California?

20 A Lost it.

21 Q So the lender foreclosed?

22 A I'm pretty sure. I think that's what
23 happened.

24 Q Okay. Any other properties you can
25 recall in the last five years?

1 A No, not to my knowledge.

2 Q I'm going to go with one of these broad
3 questions, where "you" means essentially
4 everybody: You, your husband collectively,
5 individually, the trust, any entities in which
6 that group holds an interest in, is that -- does
7 that make sense?

8 A Uh-huh, yes.

9 Q Okay. Do you own any securities?

10 A I don't even know what securities are,
11 so --

12 Q Do you own any stock?

13 A I don't know. I don't know.

14 Q Do you believe you might?

15 A I don't know of any stocks in my name or
16 not.

17 Q Okay. And, again, that's why I'm trying
18 to use the broad questions. I understand you may
19 not know if it's in your name.

20 Do you know if it's your husband's name,
21 the trust name, any --

22 A I don't know.

23 Q Okay. Are you generally aware of stock
24 that may be held in --

25 A I don't know.

1 Q You have no idea?

2 A No.

3 Q Okay. Do you own any bonds?

4 A Not to my knowledge, no.

5 Q Any CDs?

6 A No.

7 Q Any other investments?

8 A Not to my knowledge, no.

9 Q Do you own -- again, the broad sense of
10 "you" -- own any interest in any businesses?

11 A Well, I don't. I don't -- I don't know
12 if my husband does.

13 Q Okay. And that's all I'm asking about,
14 is your knowledge.

15 A Yeah.

16 Q You're positive you don't own any other
17 businesses?

18 A To the best of my knowledge.

19 Q Your husband may, but you're not sure?

20 A I don't know.

21 Q Okay. And when you -- likewise, you
22 don't know if the trust owns any other businesses?

23 A I'm pretty sure the trust doesn't own
24 anything else.

25 Q Do you hold any claims against anybody?

1 A To the best of my knowledge, no.

2 Q Another way to word that is, does
3 somebody owe you money?

4 A To the best of my knowledge, no.

5 MR. COFFING: The Super Bowl ticket
6 guy owes you money.

7 THE WITNESS: Yeah, but I'm not going
8 to get that.

9 MR. COFFING: I'm sorry. I shouldn't
10 interject, but -- and we covered that already.

11 THE WITNESS: Yeah. He owes it to
12 me, but I probably wouldn't get that. I don't
13 know.

14 BY MR. EDWARDS:

15 Q Do you know if that's part of his
16 sentence, he has to pay that money back to you?

17 A It's not part of it, no.

18 Q How long is he away for, in prison?

19 A He actually just got out. He only got a
20 year.

21 Q And to your knowledge, is he still in
22 New York?

23 A Yes.

24 Q Do you have any hope he's going to pay
25 you back?

1 A I always have hope, but --

2 Q Do you have any reason to believe he may
3 pay you back?

4 A No.

5 Q Are you aware of any discussions with
6 him about paying you back that debt?

7 A No.

8 Q Are you aware of anybody else owing you
9 money?

10 A No.

11 Q Are you aware of anyone else owing your
12 husband money?

13 A I don't know.

14 Q Are you aware of anybody owing the trust
15 any money?

16 A I don't believe so.

17 Q Are you aware of any other judgments
18 against you in the broad sense?

19 MR. COFFING: Go ahead, if you know.

20 I don't -- I'm sorry, I -- just answer his
21 question.

22 THE WITNESS: Well, we settled that
23 Bank of Nevada one.

24 MR. COFFING: Bank of America?

25 THE WITNESS: The Bank of America

1 one.

2 BY MR. EDWARDS:

3 Q I guess are you aware of anyone else
4 like my client, Far West, who is attempting --

5 A Vaguely aware.

6 Q Okay. You are aware of anyone else,
7 other than my client, who is trying to collect a
8 debt against you?

9 A Yeah, vaguely aware.

10 Q Okay. Who?

11 A Another business thing.

12 Q Okay. Do you know -- what do you know
13 about that business thing?

14 A Not a lot. Just that he's going through
15 something else.

16 Q Okay. And is there a name associated
17 with that business?

18 A I don't know.

19 Q Do you know how much --

20 A No, I don't.

21 Q -- is at issue?

22 A I don't know.

23 Q Do you know a Michael D. Sifen,
24 S-I-F-E-N?

25 A I do.

1 Q Who is that?

2 A It was a business partner of my
3 husband's or is a business partner, I don't know.
4 Investor. Or I don't know if I'm using the right
5 words.

6 Q You've met him before?

7 A Yes, I have.

8 Q Are you still friendly with him?

9 A I haven't seen him in a year, but yes.
10 I mean ...

11 Q What business dealings are you aware of
12 Mr. Sifen taking part in?

13 A I'm pretty sure he's an investor in
14 CannaVest.

15 Q Okay. Any other business dealings?

16 A I don't know.

17 Q And why do you think he's an investor in
18 CannaVest?

19 A Because I've heard them talk about it.

20 Q You've heard Mr. Sifen talk about it?

21 A Uh-huh.

22 Q Okay. Do you know, does he own his
23 interest in CannaVest directly or through some
24 entity?

25 A I have no idea.

1 Q Are you aware of any liens against you?

2 A I don't know.

3 Q Are you aware of other pending legal
4 actions against you?

5 A I don't know. Well, am I aware of it?
6 I don't think so, but I don't know.

7 MR. COFFING: That's just her.

8 THE WITNESS: Yeah, me.

9 BY MR. EDWARDS:

10 Q I'm asking you in the broader sense.

11 A Well, I just told you that I'm aware
12 that my husband is involved in another lawsuit.

13 Q Okay. The other dispute, do you have
14 any idea where they are in the proceeding? Are
15 they still fighting about it?

16 A Yes.

17 Q There's not a judgment that's been
18 entered in that case, as far as you know?

19 A I don't know. I really don't know.

20 Q Okay. So other than that case, are you
21 aware of any other cases against you or your
22 husband or the trust?

23 A I don't know of any.

24 Q Okay. Do you know if you have any tax
25 debts?

1 A I don't know.

2 Q I think earlier you mentioned a
3 bankruptcy; right?

4 A Correct.

5 Q Did you personally file for bankruptcy,
6 as well, or just your husband?

7 A Both of us.

8 Q Okay. When was that?

9 A Gosh, I don't -- 15 years ago.

10 Q Okay. So roughly 2000?

11 A Around 2000, yeah.

12 Q Okay. Did you receive your discharge
13 from the bankruptcy?

14 A No.

15 Q Okay. Why is that?

16 A We had to pay it all off.

17 Q Do you know, was it -- and I'm not good
18 at bankruptcy numbers. Was it a Chapter 7?

19 A I don't know.

20 Q Chapter 11?

21 A I think we did both at some point. I
22 don't know.

23 Q Okay. But eventually you had to pay
24 everybody off.

25 Did you pay everyone off 100 cents on

1 the dollar, or a smaller percentage?

2 A I don't know.

3 Q Where was that bankruptcy filed?

4 A Here.

5 Q Here in Las Vegas?

6 A Uh-huh.

7 Q Were you sued as it relates to that
8 bankruptcy case?

9 A I don't know. I don't know what that
10 means, was I sued.

11 Q Well, for example, did -- there's
12 something called an advisory proceeding, where one
13 of your creditors may sue you or your husband
14 claiming bad things happened with the money.

15 A I don't know the details. I just know
16 that -- you know the answer, right?

17 MR. COFFING: I do, but I can't
18 answer. I'm sorry.

19 THE WITNESS: I don't know. I know I
20 went through bankruptcy, went through a whole
21 bunch of stuff, and ended up paying everyone at
22 the end of the day.

23 MR. COFFING: It's all public
24 records.

25 THE WITNESS: Yeah, it's all public

1 records.

2 BY MR. EDWARDS:

3 Q Do you have any plans right now to file
4 for bankruptcy?

5 A No.

6 Q Are you aware of any other debts, other
7 than the mortgage, on the Red Arrow property?

8 A I'm not aware of other debts.

9 Q And I guess we have to include ourselves
10 in that. We have a -- the debt to us, as well.

11 A Yeah, I guess.

12 Q So other than our judgment and the
13 mortgage, are you aware of any other debts owed by
14 you --

15 A I mean, I only know about my house. I
16 don't know about his world, so ...

17 Q Okay. And so I know what your answer is
18 going to be, but I'm going to get the full
19 question out, and you can give me the full answer.

20 Other than the mortgage on the Red Arrow
21 property and the judgment that my client holds,
22 are you aware of any debts owed by you, your
23 husband, the trust --

24 A And the answer would be I don't know.

25 Q Okay. Presumably you would know if you

1 owed money to someone else, right, personally?

2 A Of course.

3 Q Okay. And you don't know of any money
4 debts you owe to someone else?

5 A I don't believe I owe anybody anything.

6 Q And you also don't believe anybody owes
7 you anything; correct?

8 A I don't believe so.

9 Q Other than the ticket guy?

10 A Yep.

11 Q Roughly what do you think your monthly
12 expenses are?

13 A I don't know what you call "me," so --

14 Q Okay. Well, let's first narrow it down
15 and talk about the expenses you pay associated
16 with the house.

17 What do you estimate your monthly
18 expenses are associated with the house?

19 A What I pay? Because I don't pay the
20 mortgage.

21 Q Okay. Other than the mortgage.

22 A Okay. So what I pay, I don't know,
23 20,000 a month.

24 Q And you and I live in different tax
25 brackets, so that sounds like a big number to me.

1 Can you help me break that down? Give
2 me estimates of how you arrive at that 20,000
3 figure.

4 What's the largest bill you pay on a
5 monthly basis?

6 A Well, the largest utility bill would be
7 power.

8 Q Okay. And roughly what's your power
9 bill? I know during the summer it's going to
10 be --

11 A 1200. Oh, summer, way more.

12 Q Yeah?

13 A Yeah.

14 Q What other bills get you to the \$20,000
15 figure?

16 A Well, my credit card bill is in there,
17 so ...

18 Q Okay. Where do you have a -- or with
19 whom do you have a credit card bill?

20 A It's a Visa.

21 Q Okay. Do you know -- usually the credit
22 card is associated with a particular bank.

23 A Chase.

24 Q Chase. Okay.

25 Is that your only credit card?

1 A No.

2 Q Okay. What other credit cards do you
3 hold?

4 A I have an American Express under my
5 husband's company.

6 Q Under CannaVest?

7 A I think it's actually Monaco.

8 MR. COFFING: M-O-N-A-C-O.

9 BY MR. EDWARDS:

10 Q Any other credit cards you can think of?

11 A No.

12 Q Do you use the Amex with Monaco?

13 A Yeah.

14 Q For what?

15 A Doctors, whatever.

16 Q Just any -- any expenses that you feel
17 like?

18 A No. Not anything I feel like, no.

19 Q Okay. That's what I'm trying to get an
20 understanding. You have used the credit card for
21 particular things but not others.

22 Can you help me --

23 A Gas, doctors, things like that.

24 Q Grocery shopping?

25 A I use the Visa for grocery shopping.

1 Q The Visa with Chase --

2 A Uh-huh.

3 Q -- for grocery shopping?

4 A Uh-huh.

5 Q That's a yes?

6 A Yes.

7 Q Thanks.

8 Who pays the Amex in the name of Monaco?

9 A Michael.

10 Q So that's not one of your monthly
11 expenses?

12 A No, huh-uh. The Visa is.

13 Q So -- and other than the Visa, the Amex,
14 you can't think of any other credit cards that you
15 hold?

16 A Yeah. I have a -- something else that
17 doesn't have a very high limit on that's mine that
18 I just -- yeah. Yeah.

19 Q Do you use that, as well?

20 A Occasionally, yeah.

21 Q Okay. And what bank is that with?

22 A I don't even know.

23 Q Is it an American Express?

24 A Citibank, maybe? It's a MasterCard, to
25 Citibank maybe. Citibank.

1 Q So you gave us a sense of what you put
2 on the Amex: Gas, medical expenses.

3 Any other items you typically put on the
4 Amex card?

5 A Travel.

6 Q Okay. Anything else?

7 A No, not so much.

8 Q When you say "travel," what are you
9 referring to?

10 A Airline tickets.

11 Q To?

12 A San Diego, Vegas, wherever I have to go.

13 Q Okay. Those are your two primary
14 destinations?

15 A Uh-huh.

16 Q What do you put on the Visa with Chase?

17 A Grocery shopping, anything to do with
18 the house.

19 Q Okay. And is the Visa a card that you
20 pay from the Bank of Nevada account?

21 A Yes.

22 Q And what do you put on the MasterCard?

23 A My own clothes.

24 Q Clothes?

25 A My clothes, uh-huh.

1 Q And how do you pay off the MasterCard?

2 A My Bank of George checking account.

3 Q Okay. Because that's your personal
4 money that you spend?

5 A Exactly.

6 Q Okay. You don't handle the mortgage;
7 correct?

8 A No.

9 Q You also don't handle paying rent on the
10 property in San Diego?

11 A No.

12 Q Do you receive any payments for rentals
13 of properties?

14 A No.

15 Q Do you handle any car payments?

16 A No.

17 Q You don't think there's a car payment on
18 the Jaguar; right?

19 A I don't believe so.

20 Q And your husband owns a car as well;
21 right?

22 A Yes.

23 Q What kind of car is that?

24 A Mercedes.

25 Q Okay. Do you know what year?

1 A Yeah, 2006.

2 Q Okay. Do you know, does he owe money on
3 that car?

4 A I don't believe so.

5 Q Do you have anything to do with making
6 payments on that car?

7 A No.

8 Q What, other than -- I guess we've talked
9 about your electricity bill can be pretty high,
10 especially in the summer. Your Visa bill can be
11 pretty high. I'm trying to figure out what money
12 is coming out of that --

13 A My water, my -- my fish tank is
14 ridiculous. Maintenance -- I mean, outside
15 maintenance. I mean, just everything it takes to
16 run a house.

17 Q So you pay somebody to keep up your
18 backyard?

19 A Yes.

20 Q Okay. And so other than electricity,
21 what is your next highest monthly bill that you
22 pay?

23 A I don't know. I don't know. Probably
24 the fish tank, I would say.

25 Q And why is the fish tank so expensive?

1 A Because it is.

2 Q And what associated with it is? Do you
3 have a professional that comes over and cleans it?

4 A Yes, of course.

5 MR. COFFING: It's a big tank.

6 THE WITNESS: Yeah. It was a
7 mistake.

8 BY MR. EDWARDS:

9 Q Do you make payments on any other credit
10 cards?

11 A No. I only make payments on two, Visa
12 and the -- and that MasterCard.

13 Q And do you make payments on any loans?

14 A No.

15 Q Do you make payments pursuant to any
16 settlement agreements?

17 A No.

18 Q Are you aware of any settlement
19 agreements?

20 A Isn't this one?

21 Q Well, we haven't settled here.

22 A Okay. No, I'm not aware of any.

23 MR. COFFING: B of A.

24 THE WITNESS: What?

25 MR. COFFING: B of A.

1 THE WITNESS: Oh, yeah. That's
2 already done, yes. Yes, I am.

3 MR. COFFING: That's what he was
4 asking.

5 THE WITNESS: I'm aware of that.

6 BY MR. EDWARDS:

7 Q You're aware of the Bank of America?

8 A Yes.

9 Q And is it your understanding that the
10 amount owed under the Bank of America is already
11 paid?

12 A Yes.

13 Q There's no continuing payments?

14 A No.

15 Q How much was made under the Bank of
16 America settlement?

17 A I believe around 800,000.

18 Q And do you know where that money came
19 from?

20 A I don't recall where it came from.

21 Q Do you remember generally where it came
22 from?

23 A It could have been my account. I don't
24 know. I really don't recall.

25 Q Okay. Did --

1 A I really don't recall.

2 Q Did Bank of America sue you, as well as
3 your husband?

4 A I believe so.

5 Q Were you a borrower or a guarantor as it
6 relates to Bank of America?

7 A I really don't know.

8 Q And she's going to throw something at us
9 if we're not careful about talking over each
10 other. It's a pain in the neck. I'm sorry.

11 MR. COFFING: Do you know the answer
12 to that, or do you want -- do you want me to say?
13 She's a guarantor.

14 THE WITNESS: Yeah, I really don't
15 know. I don't know the specifics.

16 BY MR. EDWARDS:

17 Q Okay. Do you know if the \$800,000 was
18 paid in a lump sum or in payments?

19 A I believe it was paid all at once.

20 Q Do you have any payments related to
21 children?

22 A I don't know.

23 Q Do you make any payments to help --

24 A No. I personally, no.

25 Q Do you help pay your daughter's school?

1 A Absolutely. Me personally? I think
2 that's what the trust does.

3 Q Okay. How does the trust pay for your
4 daughter's school?

5 A I don't know, because I'm not involved.

6 MR. COFFING: Specify which trust?

7 THE WITNESS: Oh, Mik-Nik or Nik-Mik
8 or whatever it's called. I'm sorry.

9 BY MR. EDWARDS:

10 Q Not the Mona Family Trust?

11 A No. No.

12 Q The Mik-Nik Trust you believe pays for
13 your daughter's school?

14 A Yes, I believe.

15 Q Okay. Do you out of any of your
16 accounts make any payments to help support your
17 children?

18 A Well, I helped my son with his house.

19 Q Sure. Okay. That's a good example.

20 A That was a nice help.

21 Q Absolutely.

22 Any others?

23 A No, I don't have any monthly payments to
24 my children.

25 Q Any less regularly than monthly? You

1 know, every six months?

2 A No, but I help support my daughter. She
3 doesn't have an income, so I take her shopping
4 and, you know, things like that.

5 Q Okay. Do you, you know, send her money
6 for spending money?

7 A I don't, no.

8 Q Okay. Do you know if somebody sends her
9 money for spending money?

10 A Somebody gives her spending money.

11 Q But you don't know where or how that's
12 paid?

13 A No.

14 Q Do you know if your son receives any
15 help for living expenses?

16 A I don't know.

17 Q Do you know how much your son gets paid
18 from CannaVest?

19 A That is very funny. He's 29 years old.
20 He's not going to tell me anything like that.
21 He's a grown man. I don't get involved in that
22 kind of stuff with him.

23 Q Do you have any payments to support your
24 parents?

25 A Yes.

1 Q Okay. And what are those?

2 A I give my mom \$800 a month.

3 Q Okay. Any other payments to support
4 your parents --

5 A No.

6 Q -- or your husband's parents?

7 A They're deceased.

8 Q Okay. And where does the \$800 a month
9 come from?

10 A My -- oh, that's another one of my
11 bills. That comes out of my -- that check.

12 Q The Bank of Nevada checking account?

13 A Correct.

14 Q Any other assistance you provide to your
15 parents?

16 A Nope, I don't think so.

17 Q Not with, you know, a retirement home
18 or --

19 A No.

20 Q -- medical expenses?

21 A No.

22 Q Okay. How much cash do you have?

23 A I've already told you that.

24 Q Well, you've told me the amounts in the
25 bank accounts, and I appreciate that.

1 A Oh, that's all I have. \$200 in my
2 purse.

3 Q Okay. Do you have any money in cash
4 stored in the house?

5 A No.

6 Q Do you have any cash stored in a safety
7 deposit box?

8 A No.

9 Q Do you have cash stored anywhere --

10 A No.

11 Q -- other than the bank?

12 A No.

13 Q And I'll limit that further.

14 Are you aware of any -- do you store
15 cash anywhere other than the three bank accounts
16 that we've talked about, two at the Bank of George
17 and one at the Bank of Nevada?

18 A No.

19 Q And I guess the same questions -- I
20 meant that to be the broad "you," but the same
21 goes for your husband?

22 A I have no idea how much money he has.

23 Q Okay. Are you aware if he's storing
24 cash anywhere?

25 A No.

1 Q Do you -- I'm using the broad sense of

2 "you," again -- have any safe-deposit boxes?

3 A Not that I'm aware of.

4 Q Do you have any storage facilities?

5 A Yes.

6 Q Where?

7 A Here.

8 Q In Las Vegas?

9 A Uh-huh.

10 Q Okay. Multiple?

11 A Yeah, there's more than one.

12 Q Okay. How many storage facilities?

13 A I don't know. A few.

14 Q Five?

15 A Somewhere around there, yeah.

16 Q Okay. What do you store in those

17 facilities?

18 A A bunch of junk. Christmas decorations.

19 Where all of this stuff came from.

20 Q Documents?

21 A Yeah.

22 Q What else do you --

23 A And old furniture. Furniture from the

24 Laguna house when we lost it.

25 Q Okay. What else do you store in the

1 storage facilities?

2 A Nothing other than just junk, old junk.

3 Q Okay. I guess if it's just junk, why
4 are you storing it?

5 A Yeah, I know. We need to get there and
6 throw it out.

7 Q Okay. I would ask that you not do that
8 until you talk to us.

9 A It's junk. You can have it.

10 Q Where are those storage facilities?

11 A Out -- somewhere out there towards
12 Cheyenne.

13 Q Okay. You believe that the facility is
14 at Cheyenne? On Cheyenne?

15 A I don't know the name of the street. I
16 honestly don't.

17 Q Okay. You know how to get there?

18 A Uh-huh.

19 Q Is it close to your house?

20 A No.

21 Q Okay. So you have multiple storage
22 units at one facility?

23 A Uh-huh.

24 Q Okay. And do you know what the storage
25 facility is called?

1 A No.

2 Q Okay. So to the best of your knowledge,
3 you do not hold any bank accounts jointly with
4 your husband?

5 A No, not to my knowledge. I mean, he
6 showed me a piece of paper that my name was on,
7 but I didn't even know about that.

8 Q But I guess to the best of your
9 knowledge, you are the sole signatory on your bank
10 accounts and he is the sole signatory on his bank
11 accounts?

12 A I don't know who is on his bank
13 accounts.

14 Q Okay. But you're pretty sure it's not
15 you?

16 A I don't know. To the best of my
17 knowledge, no.

18 Q Okay. Are you aware of any business
19 bank accounts?

20 A No. I mean, I have to assume business
21 bank accounts exist. He runs a business. Am I
22 privileged to any of the information on them? No.

23 Q You have no idea where or with what
24 banks --

25 A No.

1 Q -- the businesses may bank?

2 A Nope.

3 Q For Bank of George, you said you're
4 old-fashioned, you like going into the bank.

5 What branch do you typically use?

6 A I think there's only one.

7 Q Okay. Where is that?

8 A On Russell. Oh, no, there's a second
9 one now.

10 Q Is the Russell one relatively close to
11 your house?

12 A Uh-huh.

13 Q Do you maintain any financial records?

14 A My checking account.

15 Q Any of your bank statements?

16 A Uh-huh.

17 Q Okay. Other than your bank statements
18 as it relates to your accounts, do you keep any
19 financial records?

20 A I keep the records of the bills, my
21 household bills.

22 Q Anything else?

23 A No.

24 Q How do you keep records of your
25 household bills?

1 A I have files.

2 Q So you pay a bill and you -- and they're
3 marked "Paid" on them, and you throw it in a file?

4 A I'm old school. I write the checks out.

5 Q There's no spreadsheet I could look at
6 to see --

7 A No.

8 Q Do you have somebody that helps you
9 maintain financial records: A bookkeeper, for
10 example?

11 A For my own, no, huh-uh.

12 Q Okay. Do you know, does your husband
13 have a bookkeeper?

14 A I don't -- I mean, his business has
15 bookkeepers and accountants.

16 Q Okay. Do you know if he has a personal
17 bookkeeper?

18 A I don't know.

19 Q Do you know who his bookkeeper or
20 accountant is for the business?

21 A No.

22 Q No idea?

23 A Do I know who his accountant is?
24 Meaning his CFO in his business?

25 Q Sure. Do you know?

PART B

PART B

1 A Yes, I know the CFO.
2 Q Who is his CFO?
3 A His name is Joe.
4 Q Joe.
5 What is the last name?
6 A I don't know.
7 Q Do you know, does Joe do any work for
8 your husband --
9 A No, he works for the company.
10 Q Exclusively?
11 A Uh-huh.
12 Q Are you aware of any accountants that do
13 work for your husband?
14 A Yes. Ed Wilson.
15 Q Ed Wilson?
16 A Yeah. That's the accountant.
17 Q Okay. Is Ed Wilson your accountant, as
18 well?
19 A I think so, but I don't really know
20 because -- yes, I would assume he is, yes.
21 Q Okay. Are you aware of anybody else?
22 A No.
23 MR. COFFING: How are we doing? I
24 mean, it's 1:00. I don't know if you have six
25 hours or 30 minutes left.

1 MR. EDWARDS: I think we're making
2 pretty good progress.

3 (Whereupon, a recess was taken.)

4 BY MR. EDWARDS:

5 Q I think I asked you this already, but
6 you don't lease a boat; right?

7 A I don't lease a boat? No.

8 Q Okay. And you never have?

9 A No.

10 Q Are you familiar with intellectual
11 property rights?

12 A No.

13 Q Do you know if you hold any patents?

14 A No.

15 Q Do you hold any copyrights?

16 A No, I don't believe that I own any of
17 those.

18 Q Do you own any trade names?

19 A Not that I know of.

20 Q Do you own any trademarks?

21 A Not that I know of.

22 Q Do you own any royalties?

23 A Not that I know of.

24 Q And I guess in that line of questioning,
25 I was trying to use the big "you" to --

1 A The only I can think of is CannaVest has
2 a trademark on their logo or something, I would
3 assume. I don't know.

4 Q Other than that, you can't think of
5 anything?

6 A No.

7 Q Are you aware of any life insurance
8 policies?

9 A No. I would assume my husband has one.

10 Q Okay. Do you know anything about the
11 life insurance policy?

12 A No.

13 Q Have you sold or transferred any assets
14 or any property in the last five years?

15 A I don't know. Have I sold any property
16 in the last five years?

17 Q And I'm talking about real property,
18 personal property.

19 A I sold the suites, the whole Bank of
20 America --

21 MR. COFFING: That was a foreclosure.

22 THE WITNESS: Okay. And my house in
23 Laguna was a foreclosure. We sold Big Bear, which
24 we discussed, and that's all I can think of.

25

1 BY MR. EDWARDS:

2 Q Remind me again the time frame of when
3 you sold Big Bear.

4 A Five or six years ago, somewhere in
5 there. Five years ago.

6 Q Do you know what happened to the money
7 from that sale?

8 A No.

9 Q Did you see any of that money?

10 A No.

11 Q Your husband controlled it all?

12 A Correct.

13 Q Now, and you were, in your mind, going
14 through various real estate transactions. My
15 question was more broad than that. It would
16 involve anything: Furniture, any clothing, any
17 collections.

18 A No.

19 Q Can't think of anything you sold in the
20 last five years?

21 A No, not to my knowledge.

22 Q Now, using, again, the term "you" in a
23 broad sense, do you have any interest in any
24 entity, partnership, business venture?

25 A I don't know about my husband. That's

1 all I can say. Me, no.

2 Q Okay. And then the trust?

3 A I don't know.

4 Q Have you ever heard of Desert Dream
5 Properties?

6 A Never.

7 Q Never heard of it?

8 A No.

9 Q Have you ever heard of McCarran Plaza
10 Suites, Inc.?

11 A Yes.

12 Q What's that?

13 A It was supposed to be a -- a
14 hotel/casino that we lost in the bankruptcy.

15 Q Okay. Back in 2000?

16 A Uh-huh. Whatever that year was,
17 somewhere around there.

18 Q Yes?

19 A Yeah.

20 Q So since the bankruptcy, you don't
21 believe there's been any activity in the McCarran
22 Plaza Suites, Inc.?

23 A We don't own it. We lost it way back
24 then. It got sold at auction.

25 Q Have you ever heard of Roen Ventures,

1 LLC?

2 A Vaguely I've heard something, but I
3 don't know what it is at all.

4 Q Okay. What have you heard?

5 MR. COFFING: Well, did you hear it
6 from your husband?

7 THE WITNESS: I don't remember.

8 MR. COFFING: Okay. If you heard it
9 from someone other than your husband, tell him
10 that.

11 BY MR. EDWARDS:

12 Q I don't want to hear about anything you
13 discussed with your husband.

14 Are you aware of any facts about Roen
15 Ventures?

16 A No.

17 Q You've heard of CannaVest; correct?

18 A Yes.

19 Q What's your understanding of what
20 CannaVest does?

21 A It's a publicly traded stock. They deal
22 in CBD.

23 Q Okay. And just so the record is clear,
24 what's your understanding of what CBD is?

25 A It's cannabidiol. That's a whole other

1 story. It's healthy oil. It's what they get from
2 hemp.

3 Q Not to get high, but for medicinal
4 purposes?

5 A Yeah. Well, it's not even medicinal.
6 It's all health in general. It's preventative
7 health.

8 Q Okay. What else do you know about
9 CannaVest?

10 A I don't know. I don't know.

11 Q Do you know the other executives at
12 CannaVest?

13 A Yes, I know.

14 Q Who are the other CannaVest executives
15 that you're aware of?

16 A My son, Joe; Stu. You might say those
17 are the executives.

18 Q Plus your husband?

19 A Correct.

20 Q And what's Joe's last name?

21 A Not sure. Oh, I think it's Dowling,
22 something close to that.

23 Q And what's Stu's last name?

24 A I don't know, and I should know.

25 Q Is your husband essentially the founder

1 of CannaVest?

2 A Yes.

3 Q Have you ever heard of Speedway

4 Industrial Tenant, LLC?

5 A No.

6 Q Have you ever heard of Lendene
7 Enterprises, LLC? And that's L-E-N-D-E-N-E.

8 A No.

9 Q No?

10 A No, I've never heard of it.

11 Q Have you ever heard of Monaco

12 Development, LLC?

13 A Yes.

14 Q What's that?

15 A It was our company for 30 years.

16 Q Okay. What does it do now?

17 A Nothing.

18 Q It has no operations?

19 A I don't -- you know what, I really don't
20 know. I shouldn't say that. I don't know.

21 Q What's your understanding about when it
22 ceased its operations?

23 A Well, I don't know if it ceased, because
24 I know it's still there, I think. I don't know.

25 Q Are you aware of any current operations?

1 A No. I'm not exactly sure what it does.
2 Q Okay. Monaco Development, LLC, is the
3 entity that used to write you your monthly check;
4 correct?

5 A Correct.

6 Q Do they still write you any monthly
7 checks?

8 A No.

9 Q Do they pay any expenses to you?

10 A Not to me.

11 Q Do they pay any expenses for you?

12 A I don't know.

13 Q I guess I want to understand that
14 clarification.

15 They don't pay anything to you?

16 A No.

17 Q Okay. So they pay something for you?

18 A I don't know.

19 Q Okay.

20 MR. COFFING: We talked about the
21 Amex.

22 THE WITNESS: They could possibly.
23 And they could possibly be the ones paying my
24 mortgage, but I don't know that. That's a guess.

25

1 BY MR. EDWARDS:

2 Q So you're not quite sure if the mortgage
3 is being paid by CannaVest or Monaco?

4 A I don't know. I would assume Monaco,
5 though. I would assume.

6 Q Do you know where Monaco gets its money
7 from?

8 A No.

9 Q Have you ever heard of New Times, LLC?

10 A Of what?

11 Q New Times, LLC.

12 A No.

13 Q Have you heard of Rio Vista Nevada, LLC?

14 A I think that's what we're being sued
15 for, right? Rio Vista, yeah.

16 Q Have you heard of that entity before?

17 A Yes.

18 Q Okay. What is Rio Vista Nevada, LLC?

19 A It was some property out in desert --
20 Palm Springs.

21 Q Does Rio Vista Nevada, LLC, have any
22 operations that you're aware of?

23 A I don't really know anything about it.

24 Q Do you know if it stopped operating at
25 some point?

1 A I don't know if it ever was operating.

2 I don't know anything about it.

3 Q What is M&M Development, Inc.?

4 A It's what was before Monaco. Same
5 company, different name, I believe. I'm pretty
6 sure.

7 Q Okay. So to the best of your
8 understanding, there is no more M&M Development,
9 Inc.?

10 A No.

11 Q It ceased operations?

12 A I'm pretty sure.

13 Q Do you know when it ceased operations?

14 A No.

15 Q Do you know what M&M stands for?

16 A Michael and Michael.

17 Q Your husband and father -- or, I'm
18 sorry, your husband and son?

19 A Yeah.

20 Q They were working together on
21 developments?

22 A No. My son was like newborn, so ...

23 Q Okay. Do you know when M&M Development
24 became Monaco Development?

25 A I don't recall, no.

1 Q Do you remember generally?

2 A No, not really.

3 Q Have you heard of Emerald Suites, LLC?

4 A Yes.

5 Q What's that?

6 A It was what we built and owned and
7 operated.

8 Q Okay. When did you build, own, and
9 operate?

10 A After bankruptcy, that's what we started
11 on.

12 Q So sometime after 2000?

13 A Uh-huh.

14 Q Can you give me some time frames?

15 A I mean, whenever we came out of
16 bankruptcy, we started building them and -- up
17 until the recession.

18 Q Okay. From roughly 2000 to 2008?

19 A 2010? Was the recession that long ago?
20 2010.

21 Q My economist says --

22 MR. COFFING: It seems like
23 yesterday.

24 THE WITNESS: 2010, I thought, but
25 somewhere in that.

1 BY MR. EDWARDS:

2 Q Somewhere in that time frame?

3 A Uh-huh.

4 Q So what did Emerald Suites, LLC, build?

5 A Daily/weekly units.

6 Q Okay. And multiple sites, or just one?

7 A Multiple.

8 Q How many?

9 A I don't remember anymore. One on the
10 Las Vegas strip. I don't remember. Three. I
11 don't know. Because I can't remember from that
12 time to the time previously, when it was M&M and
13 it was before bankruptcy.

14 Q Okay. What happened to the properties?

15 A Oh, I know. The other one was on
16 Cameron. I think there were just two Emerald
17 Suites, one on Cameron and one on Las Vegas
18 Boulevard.

19 Q And what happened to the properties
20 developed by Emerald Suites, LLC?

21 A Did we lose them? Did we lose them?

22 MR. COFFING: I can't answer. I
23 could help, if it -- but I can't answer.

24 THE WITNESS: I think we lost them
25 back to the bank or -- I -- I know I didn't sell

1 them. I still owed money. That's what -- the
2 judgment was for them.

3 BY MR. EDWARDS:

4 Q For Bank of America?

5 A Uh-huh.

6 Q Yes?

7 A Yes.

8 Q Have you heard of Fudds, LLC?

9 F-U-D-D-S.

10 A Yes.

11 Q What is that?

12 A It was a Fuddruckers, that -- that
13 hamburger place thingy. We thought about buying
14 my son one for graduation, and we didn't -- never
15 did.

16 Q Okay. So Fudds, LLC, has never had any
17 operations?

18 A As far as I know, no.

19 Q Okay. And you talked about M&M
20 Development, Inc.

21 Have you ever heard of M&M Ventures,
22 LLC?

23 A No.

24 Q Have you ever heard of Sunrise RV Park,
25 Inc.?

1 A Yes.

2 Q What's that?

3 A That was the RV park attached to the
4 casino.

5 Q Which casino?

6 A Sunrise.

7 Q Okay. And did you have an interest in
8 Sunrise RV Park, Inc.?

9 A I owned it. Michael and I owned it.

10 Q And what happened to that asset?

11 A We lost it in the bankruptcy.

12 Q So it was an asset that you held prior
13 to 2000?

14 A Yes.

15 Q Since the bankruptcy, has there been any
16 business operations in the Sunrise RV Park, Inc.?

17 A No. Well, I don't know. I don't know
18 if it's still there, but we don't own it.

19 Q Okay. Do you know if anybody that
20 you're related to owns it?

21 A Well, no one related to us owns it.

22 Q Have you ever heard of Food@Fifth, LLC?

23 A No.

24 Q And that's the @ sign as opposed to
25 spelling it out.

1 Have you ever heard of AZ 12, LLC?

2 A AZ 12? No.

3 Q Have you ever heard of Stranger Than
4 Fiction, LLC?

5 A Yes.

6 Q What's that?

7 A It was a bad investment I made.

8 Q Okay. When did you make the investment?

9 A Oh, God, a long time ago. I don't
10 remember if it was 12 years ago or 18 years -- I
11 can't remember in what time frame. Maybe like 12
12 years ago.

13 Q What was Stranger Than Fiction, LLC,
14 supposed to be?

15 A It was supposed to be a movie and a book
16 written by Jack Sheehan. And we were all involved
17 in it, all kinds of people. And I gave \$75,000 to
18 it. It never took off.

19 Q Did you receive your money back?

20 A No.

21 Q Did you receive any money back?

22 A No. It was a thorn in Michael's side.
23 I did it when he wasn't there. I went to lunch
24 and did it myself. He wasn't thrilled.

25 Q Were there other investors in Stranger

1 Than Fiction, LLC?

2 A Yeah, tons.

3 Q And your husband wasn't one of them?

4 A No.

5 Q And what money did you use to invest in

6 Stranger Than --

7 A You know, I don't know if he was one. I
8 don't know. I actually don't know where that
9 money came from, if it was in my name or his name.
10 I don't know.

11 Q You don't know where that \$75,000 came
12 from?

13 A No. I would assume he paid it.

14 Q Okay. Have you ever heard of The
15 Employers Holdings, Inc.?

16 A No.

17 Q Have you ever heard of Bamburgh
18 Holdings, LLC?

19 A No.

20 Q I'll spell that for you. It's
21 B-A-M-B-U-R-G-H.

22 A No.

23 Q Have you ever heard of --

24 A Not to my knowledge, any of these.

25 Q Have you heard of Scarlet Holdings, LP?

1 A LB?

2 Q LP. It's a limited partnership.

3 A No, not to my knowledge.

4 Q Scarlet Holdings itself doesn't ring a
5 bell to you?

6 A Say that one more time.

7 Q Scarlet Holdings doesn't ring a bell to
8 you?

9 A Well, the name Scarlet does, but I don't
10 know about Scarlet Holdings.

11 Q What do you recall about Scarlet?

12 A I just know that name, but I don't know
13 about the holdings company.

14 Q Okay. What do you know about Scarlet?

15 A What do I know about Scarlet? It was my
16 dog's name.

17 Q Okay. Did you -- did you start a
18 company with the name of your --

19 A No, I did not. I did not, no.

20 Q And I know now we're getting later in
21 the day, but if you can --

22 A I have no idea. No idea.

23 Q Okay. I know we're getting later in the
24 day, but if you'd do your best to let me finish
25 the question.

1 A I'm sorry. I'm sorry.

2 Q I just want to make sure the record is
3 as clear as we can.

4 A Sorry.

5 Q Are you involved in any other
6 partnerships that you're aware of? I'm asking of
7 "you" in the broad sense.

8 A I can only answer for me, and I'm not.

9 Q Are you aware of any other partnerships
10 that your husband is a part of?

11 A I'm not aware.

12 Q Are you aware of any partners that your
13 trust is involved in, the Mona Family Trust?

14 A I'm not aware of.

15 Q Are you receiving any disability
16 payments?

17 A No.

18 Q Are you receiving any unemployment
19 payments?

20 A No.

21 Q Do you have any other businesses that we
22 haven't discussed today?

23 A No.

24 Q You have no retirement accounts or
25 savings at all?

1 A I don't.

2 Q And neither, to your knowledge, does
3 your husband?

4 A No my knowledge, no.

5 Q Do you own any prepaid or tuition
6 accounts for your children?

7 A No.

8 Q Are there any educational savings funds
9 for your children?

10 A No.

11 Q Do you know if the trust, the Mona
12 Family Trust, has ever filed for tax returns?

13 A I have no idea.

14 Q Do you know if you filed your 2014 tax
15 returns?

16 A I would assume my husband did my taxes
17 for me. Ed Wilson would have all of that
18 information.

19 (Exhibit No. 8 was marked.)

20 BY MR. EDWARDS:

21 Q Okay. I'm showing you what's been
22 marked as Exhibit 8, which appears to be a 2014
23 tax return for you and your husband.

24 Do you recognize this document?

25 A No.

1 Q Have you ever seen this document before?

2 A Never.

3 Q On the second page, down towards the

4 bottom, if I'm reading this right, it shows that

5 you're entitled to a refund of over \$55,000.

6 Do you see that?

7 A I see 55,000 right there.

8 Q Across from the -- in the refund aisle

9 or column -- I guess row.

10 A Okay. Cool.

11 Q Do you see that?

12 A I do.

13 Q Do you know if you've received that

14 refund?

15 A I have no idea.

16 Q This payment conceivably would have been

17 made in just the past few weeks.

18 A I wouldn't see it.

19 Q You have no idea what bank account that

20 would have been deposited into?

21 A No idea.

22 Q You would have noticed if \$55,000 was

23 deposited into one of your three accounts;

24 correct?

25 A I would have.

1 Q And you're telling me that it was not?

2 A No, it was not.

3 Q \$55,000 was not deposited in your
4 accounts since April of this year?

5 A No.

6 Q Let me direct your attention to page
7 nine or, at the bottom right-hand corner, it's
8 page 400 of Exhibit 8.

9 The very bottom, you'll see net
10 long-term capital gain or loss.

11 Do you see that?

12 A No. I'm sorry. What?

13 Q The very, very bottom.

14 A Okay.

15 Q It shows over half a million dollar loss
16 in 2014.

17 Do you see that?

18 A Uh-huh.

19 MR. COFFING: Well, I'll object that
20 it shows for '14, because that could be a loss
21 carried forward, too. So with that -- that's a
22 caveat, but I would just object to the
23 characterization of the loss of 2014.

24 BY MR. EDWARDS:

25 Q Are you aware that you reported a

1 \$500,000 loss in 2014?

2 A No, I'm not aware. I've never seen
3 this. I've never done my taxes. I've never been
4 involved. Michael has never involved me.

5 Q Do you have any idea why you would be
6 reporting a \$500,000 loss in 2014?

7 A I have no idea.

8 Q Does it surprise that you reported a
9 loss of over 500,000 in 2014?

10 A No.

11 Q Why does that not surprise you?

12 A Because when you -- because it just
13 doesn't. The money you lose running businesses
14 and stuff, I would not be surprised.

15 Q Okay. I'm going to go through some
16 lists of some assets, and I'm going to use the
17 "you" in the broad sense, again, so including you,
18 your husband, the trust, any entity that you --

19 A Got it.

20 Q -- you or the trust has an interest in.
21 Does that make sense?

22 A Got it.

23 Q Okay. Do you own any libraries?

24 A Any libraries?

25 Q Yeah.

1 A Do I own a library?

2 Q Yeah. A collection of books.

3 A Oh, I'm like -- no.

4 Q Do you own any works of art?

5 A No.

6 Q Do you own any musical instruments?

7 A No. Oh, a piano, yeah.

8 Q Okay. What kind of piano?

9 A I don't even know. I really don't know.

10 Q Okay. Where is the piano?

11 A In my home.

12 Q Here in Las Vegas? Red Arrow?

13 A Yes.

14 Q How long have you had the piano?

15 A Twenty-five years.

16 Q Steinway?

17 A No, it's not. That I would know.

18 Q Do you own any jewelry?

19 A Yeah, a little bit.

20 Q Okay. What jewelry do you own?

21 A A wedding ring, a necklace, a couple of

22 pairs of earrings.

23 Q Just one necklace?

24 A Probably a couple.

25 Q Okay. Do you know how many necklaces

1 you own?

2 A No. Two or three.

3 Q Okay. Do they have diamonds in them?

4 A Little ones.

5 Q What about your earrings, how many
6 earrings do you have?

7 A A couple of pairs.

8 Q Okay. Any diamonds or precious stones
9 in those earrings?

10 A Little -- little -- you know, not whole
11 diamonds. Little ones.

12 Q Okay. Other jewelry?

13 A No.

14 Q Other than your wedding ring, do you own
15 any rings?

16 A Yeah, I own a couple of wedding bands.

17 Q Why do you own a couple wedding bands?

18 A Because I own two, one gold and one
19 silver.

20 Q Okay. You just swap it out depending on
21 what you're wearing?

22 A Uh-huh.

23 Q Okay. Are there diamonds on the wedding
24 bands?

25 A Yeah, just little ones.

1 Q Any other jewelry?
2 A No.
3 Q Any brooches?
4 A No.
5 Q Any pins?
6 A No.
7 Q Are you wearing your wedding ring now?
8 A Yeah, one of them.
9 Q Okay. Do you have a larger one?
10 A It's a thicker band.
11 Q Okay. Larger diamonds?
12 A No.
13 Q Does your husband own any jewelry?
14 A Yeah, he's got a couple of wedding bands
15 that he doesn't wear.
16 Q Okay. And anything else?
17 A I think he has a bracelet or two also.
18 Q What kind of bracelets?
19 A Silver. He's not a jewelry person.
20 Q Okay. Is it silver or -- or do any of
21 the bracelets have precious stones?
22 A I don't think so. I don't think so.
23 Q Do you have any family keepsakes?
24 A No.
25 MR. COFFING: Aside from pictures of

1 kids and --

2 THE WITNESS: Well, yeah, I mean ...

3 BY MR. EDWARDS:

4 Q Other than pictures of kids, you don't
5 have any family keepsakes?

6 A Like what? No, I don't know.

7 Q Do you have any household goods?

8 A Well, I don't know what you mean by
9 "goods."

10 Q Well, it's pretty broad.

11 You have kitchen appliances?

12 A Yes, of course.

13 Q Okay. What kind of kitchen appliances
14 do you have?

15 A I have all of the regular kitchen
16 appliances. This is ridiculous. Okay? This is
17 ridiculous.

18 MR. COFFING: Let him ask his
19 questions.

20 THE WITNESS: Of course I have
21 kitchen appliances, all of the typical ones.

22 BY MR. EDWARDS:

23 Q And I'm sorry. I know this is tedious.

24 A I have a blender and I have a coffee
25 pot. Okay. Now I'm like really irritated.

1 MR. COFFING: That's all right.

2 BY MR. EDWARDS:

3 Q Your refrigerator, for example --

4 A I have a refrigerator and a dishwasher
5 and a stove and a microwave.

6 MR. COFFING: Just calm down. All
7 right.

8 THE WITNESS: This is ridiculous.

9 MR. COFFING: Just calm down.

10 BY MR. EDWARDS:

11 Q Who makes your refrigerator?

12 A Sub-Zero.

13 Q Okay. Who makes your dishwasher?

14 A I have no idea.

15 Q Who makes your washer machine?

16 A I have no idea.

17 Q Do you have a washer and dryer?

18 A I absolutely do have a washer and dryer.

19 Q Any large household goods like that that
20 you can think of in your home?

21 A I have a bed. I have a lot of beds. I
22 have a couch.

23 MR. COFFING: Safe to say you have
24 the normal household furnishings?

25 THE WITNESS: I have all of the

1 normal household furnishings and kitchen
2 appliances. I have dishes and glasses and
3 silverware.

4 BY MR. EDWARDS:

5 Q Is it actual silver?

6 A No, it's not.

7 Q Do you have any real silverware?

8 A No, I do not.

9 Q You said you have lots of beds.

10 How many beds do you have in your house?

11 A I have four beds.

12 Q Who makes the beds?

13 MR. COFFING: Come on. Really? Who
14 makes the beds? I mean, we are getting
15 ridiculous.

16 You have normal beds?

17 MR. EDWARDS: I don't know. I -- I
18 don't know if she has normal beds, and that's why
19 I'm asking the questions.

20 THE WITNESS: I make the beds.

21 MR. EDWARDS: I'd ask that you not
22 coach the witness. I appreciate what you're
23 doing, but --

24 MR. COFFING: I'm not, but we're
25 getting awfully tedious here and bordering on

1 harassment.

2 THE WITNESS: Yeah, it's totally
3 harassment.

4 MR. COFFING: Okay. Just answer the
5 question, if you know.

6 THE WITNESS: I make my bed.

7 BY MR. EDWARDS:

8 Q Who did you purchase your beds from?

9 A Oh, dear God.

10 MR. COFFING: You need to just answer
11 the question if you recall where you purchased
12 your bed.

13 THE WITNESS: I don't recall.

14 BY MR. EDWARDS:

15 Q Okay. You mentioned you have couches in
16 your house.

17 A Uh-huh.

18 Q What other furnishings do you have in
19 your house?

20 A Chairs, tables, lamps.

21 Q Okay. How much couches do you have in
22 the home?

23 A Two.

24 Q How many tables do you have in the
25 house?

IN THE SUPREME COURT OF THE STATE OF NEVADA

MICHAEL J. MONA, JR., an individual,

Appellant,

vs.

FAR WEST INDUSTRIES, a California
corporation,

Respondent.

Case No.: 73815 Electronically Filed
Jan 09 2018 04:29 p.m.
Elizabeth A. Brown
Clerk of Supreme Court

Appeal from the Eighth Judicial District
Court, The Honorable Joe Hardy
Presiding.

APPELLANT'S APPENDIX
(Volume 7, Bates Nos. 1425-1664)

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	Order Regarding Motion for Protective Order on Order Shortening Time (filed 06/17/15)	Volume 1 Bates Nos. 180–182
	Notice of Entry of Order Regarding Motion for Protective Order on Order Shortening Time (filed 06/17/15)	Volume 1 Bates Nos. 183–187
	Ex Parte Application for Order to Show Cause why Accounts of Rhonda Mona Should not be Subject to Execution and Why the Court Should Not Find the Monas in Contempt (filed 06/29/15)	Volume 1 Bates Nos. 188–204
	Exhibits to Ex Parte Application for Order to Show Cause why Accounts of Rhonda Mona Should not be Subject to Execution and Why the Court Should Not Find the Monas in Contempt	
Exhibit	Document Description	
1	Post-Marital Property Settlement Agreement	Volume 1 Bates Nos. 205–217
2	Judgment Debtor Examination of Michael J. Mona	Volume 1 Bates Nos. 218–223
3	Rough Draft Transcript of Deposition of Rhonda H. Mona	Volume 1 Bates Nos. 224–233
4	Judgment and Findings of Fact and Conclusions of Law	Volume 2 Bates Nos. 234–254
	Order to Show Cause Why Accounts of Rhonda Mona should not be Subject to Execution and Why the Court Should Not Find the Monas in Contempt (filed 06/30/15)	Volume 2 Bates Nos. 255–257

Notice of Entry of Order to Show Cause Why Accounts of Rhonda Mona Should not be Subject to Execution and Why the Court Should Not Find the Monas in Contempt (filed 06/30/15)		Volume 2 Bates Nos. 258–263
Response to Order to Show Cause Why Accounts of Rhonda Mona should not be Subject to Execution and Why the Court Should Not Find the Monas in Contempt (filed 07/07/15)		Volume 2 Bates Nos. 264–278
	Exhibits to Response to Order to Show Cause Why Accounts of Rhonda Mona should not be Subject to Execution and Why the Court Should Not Find the Monas in Contempt	
Exhibit	Document Description	
A	Findings of Fact and Conclusions of law (filed 03/06/12 in Superior Court of California Riverside)	Volume 2 Bates Nos. 279–295
B	Post-Marital Property Settlement Agreement	Volume 2 Bates Nos. 296–308
C	Declaration of Mike Mona in Support of Response to Order to Show Cause	Volume 2 Bates Nos. 309–310
Supplement to Response to Order to Show Cause Why Accounts of Rhonda Mona should not be Subject to Execution and Why the Court Should Not Find the Monas in Contempt (filed 07/08/15)		Volume 2 Bates Nos. 311–316
Declaration in Support of Request for Contempt (filed 07/08/15)		Volume 2 Bates Nos. 317–324
Order Regarding Order to Show Cause Why Accounts of Rhonda Mona should not be Subject to Execution and Why the Court Should Not Find the Monas in Contempt (filed 07/15/15)		Volume 2 Bates Nos. 325–335
Notice of Entry of Order to Show Cause Why Accounts of Rhonda Mona should not be Subject to Execution and Why the Court Should Not Find the Monas in Contempt (filed 07/16/15)		Volume 2 Bates Nos. 336–349
Motion to Compel Application of Particular Assets Toward Satisfaction of Judgment (filed 07/16/15)		Volume 2 Bates Nos. 350–360

	Exhibits to Motion to Compel Application of Particular Assets Toward Satisfaction of Judgment	
Exhibit	Document Description	
1	Judgment Debtor Examination of Michael J. Mona, Jr.	Volume 2 Bates Nos. 361–370
2	Deposition of Rhonda Mona	Volume 2 Bates Nos. 371–376
Plaintiff's Memorandum of Fees and Costs Associated with Order to Show Cause Why Accounts of Rhonda Mona should Not be Subject to Execution and Why the Court Should Not Find Monas in Contempt (filed 07/20/15)		Volume 2 Bates Nos. 377–380
Motion on an Order Shortening Time for Bond Pending Appeal (filed 09/09/15)		Volume 2 Bates Nos. 381–391
	Exhibits to Motion on an Order Shortening Time for Bond Pending Appeal	
Exhibit	Document Description	
1	Order (filed 08-31-15)	Volume 2 Bates Nos. 392–395
2	Judgment (filed 04/27/12 in the Superior Court of California Riverside)	Volume 2 Bates Nos. 396–414
3	Deed of Trust	Volume 2 Bates Nos. 415–422
4	Deed of Trust with Assignment of Rents	Volume 2 Bates Nos. 423–430
Opposition to Motion on an Order Shortening Time for Bond Pending Appeal (filed 09/16/15)		Volume 2 Bates Nos. 431–439
	Exhibits to Opposition to Motion on an Order Shortening Time for Bond Pending Appeal	
Exhibit	Document Description	
A	Order (filed 08/31/15)	Volume 2 Bates Nos. 440–443
B	Transcript of Proceedings of July 9, 2015 Hearing (filed 07/14/15)	Volume 2 Bates Nos. 444–447
C	Third Amended Complaint (filed 07/15/14)	Volume 2 Bates Nos. 448–459

	Exhibits to Opposition to Motion on an Order Shortening Time for Bond Pending Appeal (cont.)	
D	Complaint (filed 09/11/15)	Volume 2 Bates Nos. 460–473
E	Far West’s Motion to Intervene, for a finding and Order that the Post-Marital Agreement is void Based on the Principles of Res Judicata and Issue Preclusion, and that the Plaintiff and Defendant are Jointly Liable for the Judgment Held by Intervenor (filed 09/04/15)	Volume 3 Bates Nos. 474–517
Second Motion to Compel Application of Particular Assets Towards Satisfaction of Judgment (filed 10/12/15)		Volume 3 Bates Nos. 518–524
	Exhibits to Second Motion to Compel Application of Particular Assets Towards Satisfaction of Judgment	
Exhibit	Document Description	
1	Judgment Debtor Examination of Michael J. Mona, Jr.	Volume 3 Bates Nos. 525–531
2	Order Granting Temporary Stay (filed 07/20/15)	Volume 3 Bates Nos. 532–534
3	Order (filed 08/31/15)	Volume 3 Bates Nos. 535–538
4	Decree of Divorce (filed 07/23/15)	Volume 3 Bates Nos. 539–545
Order Regarding Motion on an Order Shortening time for Bond Pending Appeal (filed 10/16/15)		Volume 3 Bates Nos. 546–553
Plaintiff Far West Industries’ Motion for Determination of Priority of Garnishment (filed 02/16/16)		Volume 3 Bates Nos. 554–563
	Exhibits to Plaintiff Far West Industries’ Motion for Determination of Priority of Garnishment	
Exhibit	Document Description	
1	Judgment (filed 04/27/12 in the Superior Court of the State of California, Riverside)	Volume 3 Bates Nos. 564–567

	Exhibits to Plaintiff Far West Industries' Motion for Determination of Priority of Garnishment (cont.)	
2	Case Summary	Volume 3 Bates Nos. 568–570
3	Writ of Execution	Volume 3 Bates Nos. 571–575
4	Instructions to the Sheriff/Constable-Clark County	Volume 3 Bates Nos. 576–589
5	Writ of Garnishment	Volume 3 Bates Nos. 590–598
6	Email Chain between Tom Edward and Tye Hanseen	Volume 3 Bates Nos. 599–602
7	Decree of Divorce (filed 07/23/2015)	Volume 3 Bates Nos. 603–609
Plaintiff Far West Industries' Motion: (1) For Default Judgment Against Roen Ventures, LLC for Untimely Answers to Writ of Garnishment and Interrogatories; and (2) to Compel Roen Ventures, LLC's Turnover of Payment Made to, on Behalf of, or for the Benefit of Michael J. Mona, Jr. (filed 02/16/16)		Volume 3 Bates Nos. 610–622
	Exhibits to Plaintiff Far West Industries' Motion: (1) For Default Judgment Against Roen Ventures, LLC for Untimely Answers to Writ of Garnishment and Interrogatories; and (2) to Compel Roen Ventures, LLC's Turnover of Payment Made to, on Behalf of, or for the Benefit of Michael J. Mona, Jr.	
Exhibit	Document Description	
1	Judgment (filed 04/27/12 in the Superior Court of the State of California, Riverside)	Volume 3 Bates Nos. 623–626
2	Management Agreement	Volume 3 Bates Nos. 627–630
3	Management Agreement	Volume 3 Bates Nos. 631–635
4	Writ of Execution	Volume 3 Bates Nos. 636–641
5	Instructions to the Sheriff/Constable-Clark County	Volume 3 Bates Nos. 642–656

	Exhibits to Plaintiff Far West Industries' Motion: (1) For Default Judgment Against Roen Ventures, LLC for Untimely Answers to Writ of Garnishment and Interrogatories; and (2) to Compel Roen Ventures, LLC's Turnover of Payment Made to, on Behalf of, or for the Benefit of Michael J. Mona, Jr. (cont.)	
6	Writ of Garnishment	Volume 3 Bates Nos. 657–676
Plaintiff Far West Industries' Motion to Reduce Sanctions Order to Judgment (filed 02/19/16)		Volume 3 Bates Nos. 677–679
Appendix of Exhibits to Plaintiff Far West Industries' Motion to Reduce Sanctions Order to Judgment (filed 02/19/16)		
	Exhibits to Appendix of Exhibits to Plaintiff Far West Industries' Motion to Reduce Sanctions Order to Judgment	
Exhibit	Document Description	
1	Order Regarding Order to Show Cause Why Accounts of Rhonda Mona Should Not Be Subject to Execution and Why the Court Should Not Find Monas in Contempt (filed 07/15/15) (cont. in Vol. 4)	Volume 3 Bates Nos. 680–691
2	Plaintiff's Memorandum of Fees and Costs Associated With Order to Show Cause Why Accounts of Rhonda Mona Should Not be Subject to Execution and Why the Court Should Not Find Monas in Contempt (filed 07/20/15)	Volume 3 Bates Nos. 692–696
3	Transcript of Show Cause Hearing: Why Accounts Of Rhonda Mona Should Not Be Subject To Execution And Why The Court Should Not Find Monas In Contempt (filed 07/14/15)	Volume 4 Bates Nos. 697–807
4	Petition for Writ of Mandamus or Prohibition (filed 07/17/15)	Volume 4 Bates Nos. 808–849
5	Order Granting Temporary Stay (filed 07/20/15)	Volume 4 Bates Nos. 850–852
6	Order (filed 10/16/15)	Volume 4 Bates Nos. 853–856

	Exhibits to Appendix of Exhibits to Plaintiff Far West Industries' Motion to Reduce Sanctions Order to Judgment (cont.)	
7	Order Denying Motion (filed 11/19/15)	Volume 4 Bates Nos. 857–860
8	Motion to Dismiss (filed December 4, 2015)	Volume 4 Bates Nos. 861–941 Volume 5 Bates Nos. 942–957
9	Defendant Michael J. Mona, Jr.'s Reply in Support of Motion to Dismiss (filed 01/26/16)	Volume 5 Bates Nos. 958–978
Amended Appendix of Exhibits to Plaintiff Far West Industries' Motion to Reduce Sanctions Order to Judgment (filed 02/22/16)		Volume 5 Bates Nos. 979–981
	Exhibits to Amended Appendix of Exhibits to Plaintiff Far West Industries' Motion to Reduce Sanctions Order to Judgment	
Exhibit	Document Description	
4	Petition for Writ of Mandamus or Prohibition (filed 07/17/15)	Volume 5 Bates Nos. 982–1023
Mona's Opposition to Far West's Motion for Determination of Priority of Garnishment and Countermotion to Discharge Garnishment and for Return of Proceeds (filed 03/04/16)		Volume 5 Bates Nos. 1024–1053
	Exhibits to Mona's Opposition to Far West's Motion for Determination of Priority of Garnishment and Countermotion to Discharge Garnishment and for Return of Proceeds	
Exhibit	Document Description	
A	Writ of Garnishment	Volume 5 Bates Nos. 1054–1060
Third Party Roen Ventures, LLCs' Opposition to Motion: (1) For Default Judgment Against Roen Ventures, LLC for Untimely Answers to Writ of Garnishment and Interrogatories; and (2) to Compel Roen Ventures, LLC's Turnover of Payment Made to, on Behalf of, or for the Benefit of Michael J. Mona, Jr.; and Countermotion for Attorney's Fees and Costs (filed 03/04/16)		Volume 5 Bates Nos. 1061–1080

	Exhibits to Third Party Roen Ventures, LLCs' Opposition to Motion: (1) For Default Judgment Against Roen Ventures, LLC for Untimely Answers to Writ of Garnishment and Interrogatories; and (2) to Compel Roen Ventures, LLC's Turnover of Payment Made to, on Behalf of, or for the Benefit of Michael J. Mona, Jr.; and Countermotion for Attorney's Fees and Costs	
Exhibit	Document Description	
1	Declaration of Bart Mackay in Support of Opposition to Plaintiff Far West Industries' Motion: (1) for Default Judgment Against Roen Ventures, etc.	Volume 5 Bates Nos. 1081–1090
2	Declaration of Dylan Ciciliano in Support of Opposition to Plaintiff Far West Industries' Motion: (1) for Default Judgment Against Roen Ventures, etc.	Volume 5 Bates Nos. 1091–1102
3	Complaint (filed 02/07/14)	Volume 5 Bates Nos. 1103–1110
4	Motion to Enforce Settlement Agreement (filed 11/10/15)	Volume 5 Bates Nos. 1111–1144
5	Notice of Entry of Order (01/29/16)	Volume 5 Bates Nos. 1145–1151
6	Motion to Dismiss the Roen Defendants with Prejudice (filed 03/03/16)	Volume 5 Bates Nos. 1152–1171
7	Writ of Garnishment	Volume 5 Bates Nos. 1172–1179
8	Management Agreement	Volume 5 Bates Nos. 1180–1184
Mike Mona's Opposition to Motion to Reduce Sanctions Order to Judgment (filed 03/07/16)		Volume 6 Bates Nos. 1185–1192
Non-Party Rhonda Mona's Opposition to Plaintiff Far West Industries' Motion to Reduce Sanctions Order to Judgment (filed 03/07/16)		Volume 6 Bates Nos. 1193–1200

	Exhibits to Non-Party Rhonda Mona's Opposition to Plaintiff Far West Industries' Motion to Reduce Sanctions Order to Judgment	
Exhibit	Document Description	
A	Defendant's Opposition to Countermotion for Summary Judgment (filed 01/19/16)	Volume 6 Bates Nos. 1201–1223
B	Order Regarding Plaintiff Far West Industries' Countermotion for Summary Judgment	Volume 6 Bates Nos. 1224–1227
C	Petition for Writ of Mandamus or Prohibition (filed 07/17/15)	Volume 6 Bates Nos. 1228–1269
Plaintiff Far West Industries' Reply to Mona's Opposition to Far West's Motion for Determination of Priority of Garnishment and Opposition to Countermotion to Discharge Garnishment and for Return of Proceeds (filed 03/14/16)		Volume 6 Bates Nos. 1270–1282
	Exhibits to Plaintiff Far West Industries' Reply to Mona's Opposition to Far West's Motion for Determination of Priority of Garnishment and Opposition to Countermotion to Discharge Garnishment and for Return of Proceeds	
Exhibit	Document Description	
8	Writ of Garnishment	Volume 6 Bates Nos. 1283–1289
9	Judgment Debtor Examination of Michael J. Mona, Jr.	Volume 6 Bates Nos. 1290–1294
10	Deposition of Rhonda Mona	Volume 6 Bates Nos. 1295–1298
11	Checks	Volume 6 Bates Nos. 1299–1302
Plaintiff Far West Industries' Reply in Support of Motion to Reduce Sanctions Order to Judgment (filed 03/14/16)		Volume 6 Bates Nos. 1303–1309
Appendix of Exhibits to Plaintiff Far West Industries' Reply in Support of Motion to Reduce Sanctions Order to Judgment (filed 03/14/16)		Volume 6 Bates Nos. 1310–1311

	Exhibits to Appendix of Exhibits to Plaintiff Far West Industries' Reply in Support of Motion to Reduce Sanctions Order to Judgment	
Exhibit	Document Description	
11	Supplemental Appendix to Real Party In Interest's Answering Brief	Volume 6 Bates Nos. 1312–1424 Volume 7 Bates Nos. 1425–1664 Volume 8 Bates Nos. 1665–1890 Volume 9 Bates Nos. 1891–2127 Volume 10 Bates Nos. 2128–2312
Plaintiff Far West Industries' Reply to Roen Venture LLC's Opposition to Motion: (1) For Default Judgment Against Roen Ventures, LLC for Untimely Answers to Writ of Garnishment and Interrogatories; and (2) to Compel Roen Ventures, LLC's Turnover of Payment Made to, on Behalf of, or for the Benefit of Michael J. Mona, Jr., and Opposition to Countermotion for Attorney's Fees and Costs (filed 03/14/16)		Volume 10 Bates Nos. 2313–2322
Amended Appendix of Exhibits to Plaintiff Far West Industries' Reply in Support of Motion to Reduce Sanctions Order to Judgment (filed 03/15/16)		Volume 10 Bates Nos. 2323–2325
	Exhibits to Amended Appendix of Exhibits to Plaintiff Far West Industries' Reply in Support of Motion to Reduce Sanctions Order to Judgment	
Exhibit	Document Description	
10	Real Party in Interest's Answering Brief	Volume 10 Bates Nos. 2326–2367 Volume 11 Bates Nos. 2368–2385

	Exhibits to Amended Appendix of Exhibits to Plaintiff Far West Industries' Reply in Support of Motion to Reduce Sanctions Order to Judgment (cont.)	
11	Supplemental Appendix to Real Party in Interest's Answering Brief	Volume 11 Bates Nos. 2386–2607 Volume 12 Bates Nos. 2608–2836 Volume 13 Bates Nos. 2837–3081 Volume 14 Bates Nos. 3082–3138
Mona's Reply in Support of Countermotion to Discharge Garnishment and for Return of Proceeds (filed 03/23/16)		Volume 14 Bates Nos. 3139–3154
Errata to Non-Party Rhonda Mona's Opposition to Plaintiff Far West Industries' Motion to Reduce Sanctions Order to Judgment (filed 03/29/16)		Volume 14 Bates Nos. 3155–3156
Non-Party Rhonda Mona's Supplemental Briefing Following Recent Oral Argument Concerning Plaintiff Far West Industries' Motion to Reduce Sanctions Order to Judgment (filed 04/22/16)		Volume 14 Bates Nos. 3157–3172
	Exhibits to Non-Party Rhonda Mona's Supplemental Briefing Following Recent Oral Argument Concerning Plaintiff Far West Industries' Motion to Reduce Sanctions Order to Judgment	
Exhibit	Document Description	
A	Defendant's Opposition to Countermotion for Summary Judgment (filed 01/19/16)	Volume 14 Bates Nos. 3173–3193
B	Defendants Rhonda Helen Mona, Michael Mona II, and Lundene Enterprises, LLC's Reply to Plaintiff's Opposition to Motion to Dismiss (filed 01/26/16)	Volume 14 Bates Nos. 3194–3210
C	Transcript of Proceedings: Plaintiff Far West Industries' Opposition to Defendants' Motion to Dismiss and Countermotion for Summary Judgment (filed 04/06/26)	Volume 14 Bates Nos. 3211–3279
D	Decree of Divorce (filed 07/23/15)	Volume 14 Bates Nos. 3280–3286

Plaintiff Far West Industries' Supplemental Brief Regarding Motion to Reduce Sanctions Order to Judgment (filed 04/22/16)		Volume 14 Bates Nos. 3287–3298
	Exhibits to Plaintiff Far West Industries' Supplemental Brief Regarding Motion to Reduce Sanctions Order to Judgment	
Exhibit	Document Description	
12	Writ of Garnishment-Bank of George	Volume 14 Bates Nos. 3299–3305
13	Writ of Garnishment-Bank of Nevada	Volume 14 Bates Nos. 3306–3313
14	Mona's Redacted Bank Records	Volume 14 Bates Nos. 3314–3327
Supplemental Brief Regarding Judicial Estoppel and Reducing the Sanction Order to Judgment (filed 04/23/16)		Volume 15 Bates Nos. 3328–3346
Order Regarding Plaintiff Far West Industries' Motion: (1) For Default Judgment Against Roen Ventures, LLC for Untimely Answers to Writ of Garnishment Interrogatories; and (2) to compel Roen Ventures, LLC's Turnover of Payments Made to, on Behalf of, or for the Benefit of Michael J. Mona, Jr. (filed 04/28/16)		Volume 15 Bates Nos. 3347–3350
Order Regarding Plaintiff Far West Industries' Motion for Determination of Priority of Garnishment and Defendant Michael J. Mona's Countermotion to Discharge Garnishment and for Return of Proceeds (filed 06/21/16)		Volume 15 Bates Nos. 3351–3356
Notice of Entry of Order Regarding Plaintiff Far West Industries' Motion for Determination of Priority of Garnishment and Defendant Michael J. Mona's Countermotion to Discharge Garnishment and for Return of Proceeds (filed 06/21/16)		Volume 15 Bates Nos. 3357–3365
Notice of Entry of Order Shortening Time and Notice of Hearing (filed 07/07/16)		Volume 15 Bates Nos. 3366–3372
Joint Case Appeal Statement (filed 07/14/16)		Volume 15 Bates Nos. 3373–3378

Joint Notice of Appeal (filed 07/15/16)		Volume 15 Bates Nos. 3379–3397
Claim of Exemption (filed 07/15/16)		Volume 15 Bates Nos. 3398–3400
Plaintiff's Far West Industries' Objection to Claim of Exception from Execution on an Order Shortening Time (filed 07/21/16)		Volume 15 Bates Nos. 3401–3411
	Exhibits to Plaintiff's Far West Industries' Objection to Claim of Exception from Execution on an Order Shortening Time	
Exhibit	Document Description	
1	Writ of Garnishment-Michael Mona	Volume 15 Bates Nos. 3412–3416
2	Writ of Execution	Volume 15 Bates Nos. 3417–3421
Memorandum of Points and Authorities in Support of Claim of Exemption and Discharge (filed 07/29/16)		Volume 15 Bates Nos. 3422–3452
	Exhibits to Memorandum of Points and Authorities in Support of Claim of Exemption and Discharge	
Exhibit	Document Description	
A	Legislative History related to 120 day expiration period	Volume 15 Bates Nos. 3453–3501
B	Notice of Entry of Decree of Divorce	Volume 15 Bates Nos. 3502–3510
C	Plaintiff's Opposition to Far West's Motion to Intervene for a Finding and Order that the Post-Marital Agreement is Void Based on the Principles of Res Judicata and Issue Preclusion, and that the Plaintiff and Defendant are Jointly Liable for the Judgment Held by Intervenor and Plaintiff's Countermotion for Far West to Pay Plaintiff's Attorneys Fees and Costs Incurred Pursuant to NRS 12.130(1)(d)	Volume 15 Bates Nos. 3511–3524

	Exhibits to Memorandum of Points and Authorities in Support of Claim of Exemption and Discharge (cont.)	
D	Defendant Michael Mona's Joinder to Plaintiff's Opposition to Far West's Motion to Intervene for a Finding and Order that the Post-Marital Agreement is Void Based on the Principles of Res Judicata and Issue Preclusion, and that the Plaintiff and Defendant are Jointly Liable for the Judgment Held by Intervenor and Plaintiff's Countermotion for Far West to Pay Plaintiff's Attorneys Fees and Costs Incurred Pursuant to NRS 12.130(1)(d) (filed 09/29/15)	Volume 15 Bates Nos. 3525–3528
E	Notice of Entry of Order (filed 12/01/15)	Volume 15 Bates Nos. 3529–3533
F	Writ of Garnishment-Michael Mona	Volume 15 Bates Nos. 3534–3535
G	Constable's return of Notice of Execution after Judgment and Writ of Execution to Michael Mona	Volume 15 Bates Nos. 3536–3545
H	Writ of Garnishment- Michael Mona	Volume 15 Bates Nos. 3546–3556
I	Claim of Exemption (filed 07/15/16)	Volume 15 Bates Nos. 3557–3560
J	Mona's Opposition to Far West's Motion for Determination of Priority of Garnishment and Countermotion to Discharge Garnishment and for Return of Proceeds (filed 03/04/16)	Volume 16 Bates Nos. 3561–3598
K	Mona's Reply in Support of Countermotion to Discharge Garnishment and for Return of Proceeds (filed 03/23/16)	Volume 16 Bates Nos. 3599–3614
L	NRS 21.112	Volume 16 Bates Nos. 3615–3616
M	Affidavit of Claiming Exempt Property form	Volume 16 Bates Nos. 3617–3618
Order Sustaining Plaintiff Far West Industries' Objection to Claim of Exemption from Execution (filed 08/09/16)		Volume 16 Bates Nos. 3619–3621
Memorandum of Points and authorizes in Support of Claim of Exemption and Motion to Discharge Garnishment (filed 11/10/16)		Volume 16 Bates Nos. 3622–3659

Appendix of Exhibits Attached to Memorandum of Points and Authorities in Support of Claim of Exemption and Motion for Discharge of Garnishment (filed 11/10/16)		Volume 16 Bates Nos. 3660–3662
	Exhibits to Appendix of Exhibits Attached to Memorandum of Points and Authorities in Support of Claim of Exemption and Motion for Discharge of Garnishment	
Exhibit	Document Description	
A	Nevada Assembly Bill 247, Chapter 338, Page 699 (1989)	Volume 16 Bates Nos. 3663–3711
B	Decree of Divorce dated July 23, 2015	Volume 16 Bates Nos. 3712–3718
C	Rhonda’s Opposition to Motion to Intervene dated September 28, 2015	Volume 16 Bates Nos. 3719–3731
D	Mona’s September 29, 2015 Joinder to Rhonda’s Opposition	Volume 16 Bates Nos. 3732–3735
E	November 25, 2015 Order Denying Intervention and awarding fees and costs	Volume 16 Bates Nos. 3736–3738
F	Writ of Garnishment expiring April 29, 2016	Volume 16 Bates Nos. 3739–3740
G	Writ of Garnishment served July 1, 2016	Volume 16 Bates Nos. 3741–3748
H	July 5, 2016 correspondence from Constable with Notice and Writ of Execution	Volume 16 Bates Nos. 3749–3758
I	Writ of Execution and Writ of Garnishment served October 31, 2016	Volume 16 Bates Nos. 3759–3769
J	Claim of Exemption forms from Clark County and the Self-Help Center	Volume 16 Bates Nos. 3770–3777
K	NRS 21.075	Volume 16 Bates Nos. 3778–3780
L	NRS 20.076	Volume 16 Bates Nos. 3781–3782
M	NRS 21.090	Volume 16 Bates Nos. 3783–3785
N	NRS 21.112	Volume 16 Bates Nos. 3786–3787
O	NRS 31.200	Volume 16 Bates Nos. 3788–3789
P	NRS 31.249	Volume 16 Bates Nos. 3790–3791

	Exhibits to Appendix of Exhibits Attached to Memorandum of Points and Authorities in Support of Claim of Exemption and Motion for Discharge of Garnishment (cont.)	
Q	NRS 31.260	Volume 16 Bates Nos. 3792–3793
R	NRS 31.270	Volume 16 Bates Nos. 3794–3795
S	NRS 31.295	Volume 16 Bates Nos. 3796–3797
T	NRS 31.296	Volume 16 Bates Nos. 3798–3799
U	EDCR 2.20	Volume 16 Bates Nos. 3800–3801
Claim of Exemption from Execution (filed 11/10/16)		Volume 17 Bates Nos. 3802–3985
Far West Industries’ Objection to Claim of Exemption from Execution on an Order shortening Time and Motion for Attorney Fees and Costs Pursuant to NRS 18.010(2)(b) (filed 11/21/16)		Volume 17 Bates Nos. 3986–4002
	Exhibits to Far West Industries’ Objection to Claim of Exemption from Execution on an Order shortening Time and Motion for Attorney Fees and Costs Pursuant to NRS 18.010(2)(b)	
Exhibit	Document Description	
1	Findings of Fact and Conclusions of Law (filed 03/06/12 Superior Court of California, County of Riverside)	Volume 17 Bates Nos. 4003–4019
2	Order Regarding Plaintiff Far West Industries’ Motion for Determination of Priority of Garnishment and Defendant Michael J. Mona’s Countermotion to Discharge Garnishment and for Return of Proceeds (filed 06/21/16)	Volume 17 Bates Nos. 4020–4026
3	Writ of Execution	Volume 17 Bates Nos. 4027–4035
4	Documents from the Office of the Ex–Officio Constable	Volume 17 Bates Nos. 4036–4039
Affidavit of Service upon CV Sciences, Inc. FKA Cannavest Corp. (filed 11/23/16)		Volume 17 Bates Nos. 4040–4041

Order Continuing Hearing re Far West's Objection to Claim of Exemption from Execution on an Order Shortening Time (filed 12/06/16)		Volume 17 Bates Nos. 4042–4043
Notice of Entry of Order Continuing Hearing on Objection to Claim of Exemption (filed 12/07/16)		Volume 18 Bates Nos. 4044–4048
Opposition to Plaintiff's Motion for Attorney Fees and Costs Pursuant to NRS 18.010(2)(b) (filed 12/08/16)		Volume 18 Bates Nos. 4049–4054
Declaration of Rosanna Wesp (filed 12/15/16)		Volume 18 Bates Nos. 4055–4056
Order Regarding Mona's Claim of Exemption, Motion to Discharge, Memorandum of Points and Authorities, and Far West's Objection to Claim or Exemption Regarding October 2016 Garnishment (filed 01/09/17)		Volume 18 Bates Nos. 4057–4058
Notice of Entry of Order (filed 01/10/17)		Volume 18 Bates Nos. 4059–4063
Application for Issuance of Order for Arrest of Defendant Michael J. Mona, Jr. (filed 01/20/17)		Volume 18 Bates Nos. 4064–4066
	Exhibits to Application for Issuance of Order for Arrest of Defendant Michael J. Mona, Jr.	
Exhibit	Document Description	
1	Subpoena Duces Tecum to Michael D. Sifen	Volume 18 Bates Nos. 4067–4076
Michael J. Mona's Opposition to Application for Issuance of Order for Arrest of Defendant Michael J. Mona, Jr. (filed 02/06/17)		Volume 18 Bates Nos. 4077–4089
	Exhibits to Michael J. Mona's Opposition to Application for Issuance of Order for Arrest of Defendant Michael J. Mona, Jr.	
Exhibit	Document Description	
1	Decree of Divorce (filed 07/23/15)	Volume 18 Bates Nos. 4090–4096
Reply to Opposition to Application for Issuance of Order for Arrest of Defendant Michael J. Mona, Jr. (filed 02/14/17)		Volume 18 Bates Nos. 4097–4107
	Exhibits to Reply to Opposition to Application for Issuance of Order for Arrest of Defendant Michael J. Mona, Jr.	
Exhibit	Document Description	
A	Decree of Divorce (filed 07/23/15)	Volume 18 Bates Nos. 4108–4114

	Exhibits to Reply to Opposition to Application for Issuance of Order for Arrest of Defendant Michael J. Mona, Jr. (cont.)	
B	Nevada Secretary of State Entity Details for CV Sciences, Inc.	Volume 18 Bates Nos. 4115–4118
C	Executive Employment Agreement	Volume 18 Bates Nos. 4119–4136
	Exhibits to Reply to Opposition to Application for Issuance of Order for Arrest of Defendant Michael J. Mona, Jr. (cont.)	
D	Judgment Debtor Examination of Michael Mona	Volume 18 Bates Nos. 4137–4148
E	Residential Lease/Rental Agreement	Volume 18 Bates Nos. 4149–4152
F	Management Agreement	Volume 18 Bates Nos. 4153–4157
Claim of Exemption from Execution (filed 03/24/17)		Volume 18 Bates Nos. 4158–4164
Appendix of Exhibits Attached to Memorandum of Points and Authorities in Support of Claim of Exemption and Motion to Discharge Garnishment (filed 03/24/17)		Volume 18 Bates Nos. 4165–4167
	Exhibits to Appendix of Exhibits Attached to Memorandum of Points and Authorities in Support of Claim of Exemption and Motion to Discharge Garnishment	
Exhibit	Document Description	
A	Nevada Assembly Bill 247, Chapter 338, Page 699 (1989)	Volume 18 Bates Nos. 4168–4216
B	Decree of Divorce dated July 23, 2015	Volume 18 Bates Nos. 4217–4223
C	Rhonda’s Opposition to Motion to Intervene dated September 28, 2015	Volume 18 Bates Nos. 4224–4236
D	Mona’s September 29, 2015 Joinder to Rhonda’s Opposition	Volume 18 Bates Nos. 4237–4240
E	November 25, 2015 Order Denying Intervention and awarding fees and costs	Volume 18 Bates Nos. 4241–4243
F	Writ of Garnishment expiring April 29, 2016	Volume 18 Bates Nos. 4244–4245

	Exhibits to Appendix of Exhibits Attached to Memorandum of Points and Authorities in Support of Claim of Exemption and Motion to Discharge Garnishment (cont.)	
G	Writ of Garnishment served July 1, 2016	Volume 18 Bates Nos. 4246–4253
H	July 5, 2016 correspondence from Constable with Notice and Writ of Execution	Volume 18 Bates Nos. 4254–4263
I	Writ of Execution and Writ of Garnishment served October 31, 2016	Volume 18 Bates Nos. 4264–4274
J	Claim of Exemption forms from Clark County and the Self-Help Center	Volume 18 Bates Nos. 4275–4282
K	NRS 21.075	Volume 19 Bates Nos. 4283–4285
L	NRS 20.076	Volume 19 Bates Nos. 4286–4287
M	NRS 21.090	Volume 19 Bates Nos. 4288–4290
N	NRS 21.112	Volume 19 Bates Nos. 4291–4292
O	NRS 31.200	Volume 19 Bates Nos. 4293–4294
P	NRS 31.249	Volume 19 Bates Nos. 4295–4296
Q	NRS 31.260	Volume 19 Bates Nos. 4297–4298
R	NRS 31.270	Volume 19 Bates Nos. 4299–4300
S	NRS 31.295	Volume 19 Bates Nos. 4301–4302
T	NRS 31.296	Volume 19 Bates Nos. 4303–4304
U	EDCR 2.20	Volume 19 Bates Nos. 4305–4306
V	Check to Mike Mona, Writ of Execution, and Writ of Garnishment	Volume 19 Bates Nos. 4307–4323

Memorandum of Points and Authorities in Support of Claim of Exemption and Motion to Discharge Garnishment (filed 03/30/17)		Volume 19 Bates Nos. 4324–4359
Appendix of Exhibits Attached to Memorandum of Points and Authorities in Support of Claim of Exemption and Motion to Discharge Garnishment (filed 03/30/17)		Volume 19 Bates Nos. 4360–4362
	Exhibits to Appendix of Exhibits Attached to Memorandum of Points and Authorities in Support of Claim of Exemption and Motion to Discharge Garnishment	
Exhibit	Document Description	
A	Nevada Assembly Bill 247, Chapter 338, Page 699 (1989)	Volume 19 Bates Nos. 4363–4411
B	Decree of Divorce dated July 23, 2015	Volume 19 Bates Nos. 4412–4418
C	Rhonda’s Opposition to Motion to Intervene dated September 28, 2015	Volume 19 Bates Nos. 4419–4431
D	Mona’s September 29, 2015 Joinder to Rhonda’s Opposition	Volume 19 Bates Nos. 4432–4435
E	November 25, 2015 Order Denying Intervention and awarding fees and costs	Volume 19 Bates Nos. 4436–4438
F	Writ of Garnishment expiring April 29, 2016	Volume 19 Bates Nos. 4439–4440
G	Writ of Garnishment served July 1, 2016	Volume 19 Bates Nos. 4441–4448
H	July 5, 2016 correspondence from Constable with Notice and Writ of Execution	Volume 19 Bates Nos. 4449–4458
I	Writ of Execution and Writ of Garnishment served October 31, 2016	Volume 19 Bates Nos. 4459–4469
J	Claim of Exemption forms from Clark County and the Self-Help Center	Volume 19 Bates Nos. 4470–4477
K	NRS 21.075	Volume 19 Bates Nos. 4478–4480
L	NRS 20.076	Volume 19 Bates Nos. 4481–4482
M	NRS 21.090	Volume 19 Bates Nos. 4483–4485
N	NRS 21.112	Volume 19 Bates Nos. 4486–4487

	Exhibits to Appendix of Exhibits Attached to Memorandum of Points and Authorities in Support of Claim of Exemption and Motion to Discharge Garnishment (cont.)	
O	NRS 31.200	Volume 19 Bates Nos. 4488–4489
P	NRS 31.249	Volume 19 Bates Nos. 4490–4491
Q	NRS 31.260	Volume 19 Bates Nos. 4492–4493
R	NRS 31.270	Volume 19 Bates Nos. 4494–4495
S	NRS 31.295	Volume 19 Bates Nos. 4496–4497
T	NRS 31.296	Volume 19 Bates Nos. 4498–4499
U	EDCR 2.20	Volume 19 Bates Nos. 4500–4501
V	Check to Mike Mona, Writ of Execution, and Writ of Garnishment	Volume 19 Bates Nos. 4502–4518
W	Check to CV Sciences, Writ of Execution, and Writ of Garnishment	Volume 20 Bates Nos. 4519–4535
X	Affidavit of Service regarding March 15, 2017 service of Writ of Execution, and Writ of Garnishment from Laughlin Township Constable’s Office	Volume 20 Bates Nos. 4536–4537
Claim of Exemption from Execution (filed 03/30/17)		Volume 20 Bates Nos. 4538–4544
Order Regarding Far West’s Application for Issuance of Order for Arrest of Defendant Michael J. Mona, Jr. (filed 03/31/17)		Volume 20 Bates Nos. 4545–4546
Notice of Entry of Order (filed 04/03/17)		Volume 20 Bates Nos. 4547–4550
Memorandum of Points and Authorities in Support of Claim of Exemption and Motion to Discharge Garnishment (filed 04/20/17)		Volume 20 Bates Nos. 4551–4585
Claim of Exemption from Execution (filed 04/20/17)		Volume 20 Bates Nos. 4586–4592

Appendix of Exhibits Attached to Memorandum of Points and Authorities in Support of Claim of Exemption and Motion to Discharge Garnishment (filed 04/20/17)		Volume 20 Bates Nos. 4593–4595
	Exhibits to Appendix of Exhibits Attached to Memorandum of Points and Authorities in Support of Claim of Exemption and Motion to Discharge Garnishment	
Exhibit	Document Description	
A	Nevada Assembly Bill 247, Chapter 338, Page 699 (1989)	Volume 20 Bates Nos. 4596–4644
B	Decree of Divorce dated July 23, 2015	Volume 20 Bates Nos. 4645–4651
C	Rhonda’s Opposition to Motion to Intervene dated September 28, 2015	Volume 20 Bates Nos. 4652–4664
D	Mona’s September 29, 2015 Joinder to Rhonda’s Opposition	Volume 20 Bates Nos. 4665–4668
E	November 25, 2015 Order Denying Intervention and awarding fees and costs	Volume 20 Bates Nos. 4669–4671
F	Writ of Garnishment expiring April 29, 2016	Volume 20 Bates Nos. 4672–4673
G	Writ of Garnishment served July 1, 2016	Volume 20 Bates Nos. 4674–4681
H	July 5, 2016 correspondence from Constable with Notice and Writ of Execution	Volume 20 Bates Nos. 4682–4691
I	Writ of Execution and Writ of Garnishment served October 31, 2016	Volume 20 Bates Nos. 4692–4702
J	Claim of Exemption forms from Clark County and the Self-Help Center	Volume 20 Bates Nos. 4703–4710
K	NRS 21.075	Volume 20 Bates Nos. 4711–4713
L	NRS 20.076	Volume 20 Bates Nos. 4714–4715
M	NRS 21.090	Volume 20 Bates Nos. 4716–4718
N	NRS 21.112	Volume 20 Bates Nos. 4719–4720
O	NRS 31.200	Volume 20 Bates Nos. 4721–4722
P	NRS 31.249	Volume 20 Bates Nos. 4723–4724

	Exhibits to Appendix of Exhibits Attached to Memorandum of Points and Authorities in Support of Claim of Exemption and Motion to Discharge Garnishment (cont.)	
Q	NRS 31.260	Volume 20 Bates Nos. 4725–4726
R	NRS 31.270	Volume 20 Bates Nos. 4727–4728
S	NRS 31.295	Volume 20 Bates Nos. 4729–4730
T	NRS 31.296	Volume 20 Bates Nos. 4731–4732
U	EDCR 2.20	Volume 20 Bates Nos. 4733–4734
V	Check to Mike Mona, Writ of Execution, and Writ of Garnishment	Volume 20 Bates Nos. 4735–4751
W	Check to CV Sciences, Writ of Execution, and Writ of Garnishment	Volume 20 Bates Nos. 4752–4768
X	Affidavit of Service regarding March 15, 2017 service of Writ of Execution, and Writ of Garnishment from Laughlin Township Constable’s Office	Volume 21 Bates Nos. 4769–4770
Y	Affidavit of Service regarding April 3, 2017 service of Writ of Execution, and Writ of Garnishment from Laughlin Township Constable’s Office	Volume 21 Bates Nos. 4771–4788
Stipulation and Order Regarding Amended Nunc Pro Tunc Order Regarding Plaintiff Far West Industries’ Motion to Reduce Sanctions Order to Judgment (filed 04/24/17)		Volume 21 Bates Nos. 4789–4791
Notice of Entry Stipulation and Order Regarding amended Nunc Pro Tunc Order regarding Plaintiff Far West Industries’ Motion to Reduce Sanctions Order to Judgment (filed 04/25/17)		Volume 21 Bates Nos. 4792–4797
Plaintiff Far West Industries Objection to Claim of Exemption from Execution on an Order Shortening Time and Motion for Attorney Fees and Costs Pursuant to NRS 18.010(2)(b) (filed 05/02/17)		Volume 21 Bates Nos. 4798–4817

	Exhibits to Plaintiff Far West Industries Objection to Claim of Exemption from Execution on an Order Shortening Time and Motion for Attorney Fees and Costs Pursuant to NRS 18.010(2)(b)	
Exhibit	Document Description	
1	Findings of Fact and Conclusions of law (filed 03/06/12 Superior Court of California Riverside)	Volume 21 Bates Nos. 4818–4834
2	Order Regarding Plaintiff Far West Industries’ Motion for Determination of Priority of Garnishment and Defendant Michael J. Mona’s Countermotion to Discharge Garnishment and for Return of Proceeds (filed 06/21/16)	Volume 21 Bates Nos. 4835–4841
3	Nevada Secretary of State Entity Details for CV Sciences, Inc.	Volume 21 Bates Nos. 4842–4845
4	Answers to Interrogatories	Volume 21 Bates Nos. 4846–4850
Stipulation and Order Regarding Writ of Garnishment Served 04/03/17 and Claim of Exemption , and Vacating Related Hearing without Prejudice (filed 05/15/17)		Volume 21 Bates Nos. 4851–4854
Notice of Entry of Stipulation and Order Regarding Writ of Garnishment Served 04/03/17 and Claim of Exemption , and Vacating Related Hearing without Prejudice (filed 05/16/17)		Volume 21 Bates Nos. 4855–4861
Claim of Exemption from Execution (filed 05/23/17)		Volume 21 Bates Nos. 4862–4868
Appendix of Exhibits Attached to Memorandum of Points and Authorities in Support of Claim of Exemption and Motion to Discharge Garnishment (filed 05/23/17)		Volume 21 Bates Nos. 4869–4871
	Exhibits to Appendix of Exhibits Attached to Memorandum of Points and Authorities in Support of Claim of Exemption and Motion to Discharge Garnishment	
Exhibit	Document Description	
A	Nevada Assembly Bill 247, Chapter 338, Page 699 (1989)	Volume 21 Bates Nos. 4872–4920
B	Decree of Divorce dated July 23, 2015	Volume 21 Bates Nos. 4921–4927
C	Rhonda’s Opposition to Motion to Intervene dated September 28, 2015	Volume 21 Bates Nos. 4928–4940

	Exhibits to Appendix of Exhibits Attached to Memorandum of Points and Authorities in Support of Claim of Exemption and Motion to Discharge Garnishment (cont.)	
D	Mona's September 29, 2015 Joinder to Rhonda's Opposition	Volume 21 Bates Nos. 4941–4944
E	November 25, 2015 Order Denying Intervention and awarding fees and costs	Volume 21 Bates Nos. 4945–4947
F	Writ of Garnishment expiring April 29, 2016	Volume 21 Bates Nos. 4948–4949
G	Writ of Garnishment served July 1, 2016	Volume 21 Bates Nos. 4950–4957
H	July 5, 2016 correspondence from Constable with Notice and Writ of Execution	Volume 21 Bates Nos. 4958–4967
I	Writ of Execution and Writ of Garnishment served October 31, 2016	Volume 21 Bates Nos. 4968–4978
J	Claim of Exemption forms from Clark County and the Self-Help Center	Volume 21 Bates Nos. 4979–4986
K	NRS 21.075	Volume 21 Bates Nos. 4987–4989
L	NRS 20.076	Volume 21 Bates Nos. 4990–4991
M	NRS 21.090	Volume 21 Bates Nos. 4992–4994
N	NRS 21.112	Volume 21 Bates Nos. 4995–4996
O	NRS 31.200	Volume 21 Bates Nos. 4997–4998
P	NRS 31.249	Volume 21 Bates Nos. 4999–5000
Q	NRS 31.260	Volume 21 Bates Nos. 5001–5002
R	NRS 31.270	Volume 21 Bates Nos. 5003–5004
S	NRS 31.295	Volume 21 Bates Nos. 5005–5006
T	NRS 31.296	Volume 21 Bates Nos. 5007–5008

	Exhibits to Appendix of Exhibits Attached to Memorandum of Points and Authorities in Support of Claim of Exemption and Motion to Discharge Garnishment (cont.)	
U	EDCR 2.20	Volume 21 Bates Nos. 5009–5010
V	Check to Mike Mona, Writ of Execution, and Writ of Garnishment	Volume 22 Bates Nos. 5011–5027
W	Check to CV Sciences, Writ of Execution, and Writ of Garnishment	Volume 22 Bates Nos. 5028–5044
X	Affidavit of Service regarding March 15, 2017 service of Writ of Execution, and Writ of Garnishment from Laughlin Township Constable’s Office	Volume 22 Bates Nos. 5045–5046
Y	Affidavit of Service regarding April 3, 2017 service of Writ of Execution, and Writ of Garnishment from Laughlin Township Constable’s Office	Volume 22 Bates Nos. 5047–5064
Z	Writ of Execution and Writ of Garnishment served May 9, 2017	Volume 22 Bates Nos. 5065–5078
Memorandum of Points and Authorities in Support of Claim of Exemption and Motion to Discharge Garnishment (filed 05/23/17)		Volume 22 Bates Nos. 5079–5114
Plaintiff Far West Industries Objection to Claim of Exemption from Execution on an Order Shortening Time and Motion for Attorney Fees and Costs Pursuant to NRS 18.010(2)(b) (filed 06/05/17)		Volume 22 Bates Nos. 5115–5131
	Exhibits to Plaintiff Far West Industries Objection to Claim of Exemption from Execution on an Order Shortening Time and Motion for Attorney Fees and Costs Pursuant to NRS 18.010(2)(b)	
Exhibit	Document Description	
1	Findings of Fact and Conclusions of law (filed 03/06/12 in Superior Court of California Riverside)	Volume 22 Bates Nos. 5132–5148
2	Order Regarding Plaintiff Far West Industries’ Motion for Determination of Priority of Garnishment and Defendant Michael J. Mona’s Countermotion to Discharge Garnishment and for Return of Proceeds (filed 06/21/16)	Volume 22 Bates Nos. 5149–5155

	Exhibits to Plaintiff Far West Industries Objection to Claim of Exemption from Execution on an Order Shortening Time and Motion for Attorney Fees and Costs Pursuant to NRS 18.010(2)(b) (cont.)	
3	Affidavit of Service by Laughlin Township Constable's Office	Volume 22 Bates Nos. 5156–5157
4	Affidavit of Service by Laughlin Township Constable's Office	Volume 22 Bates Nos. 5158–5159
Notice of Entry of Order Sustaining Plaintiff Far West Industries' Objection to Claim of Exemption from Execution (filed 07/19/17)		Volume 22 Bates Nos. 5160–5165
Ex Parte Motion for Order Allowing Judgment Debtor Examination of Michael J. Mona, Jr., Individually, and as Trustee of the Mona Family Trust Dated February 12, 2002 (filed 08/16/17)		Volume 22 Bates Nos. 5166–5179
Notice of Appeal (filed 08/18/17)		Volume 22 Bates Nos. 5180–5182
	Exhibits to Notice of Appeal	
Exhibit	Document Description	
1	Notice of Entry of Order Sustaining Plaintiff Far West Industries' Objection to Claim of Exemption from Execution (filed 07/19/17)	Volume 22 Bates Nos. 5183–5189
2	Notice of Entry of Order Regarding Plaintiff Far West Industries' Motion for Determination of Priority of Garnishment and Defendant Michael J. Mona's Countermotion to Discharge Garnishment and for Return of Proceeds (filed 06/21/16)	Volume 22 Bates Nos. 5190–5199
Order for Examination of Judgment Debtor Michael J. Mona, Jr., Individually, and as Trustee of the Mona Family Trust dated February 12, 2002 (filed 08/18/17)		Volume 22 Bates Nos. 5200–5211
Far West Industries' Reply to CV Sciences Inc.'s Answers to Writ of Garnishment Interrogatories and Ex parte Request for Order to Show Cause Why CV Sciences Inc. Should Not be Subjected to Garnishment Penalties (filed 11/20/17)		Volume 22 Bates Nos. 5212–5223

	Exhibits to Far West Industries' Reply to CV Sciences Inc.'s Answers to Writ of Garnishment Interrogatories and Ex parte Request for Order to Show Cause Why CV Sciences Inc. Should Not be Subjected to Garnishment Penalties	
Exhibit	Document Description	
1	Answers to Interrogatories to be Answered by Garnishee	Volume 22 Bates Nos. 5224–5229
2	United States Securities and Exchange Commission, Form 10-K	Volume 22 Bates Nos. 5230–5233
3	Judgment Debtor Examination of Michael J. Mona, Jr.	Volume 22 Bates Nos. 5234–5241
4	Excerpts of Car Lease Documents	Volume 22 Bates Nos. 5242–5244
5	Excerpts of Life Insurance Premium Documents	Volume 22 Bates Nos. 5245–5250
6	Excerpts of Car Insurance Documents	Volume 23 Bates Nos. 5251–5254
7	Laughlin Constable Affidavit of Service	Volume 23 Bates Nos. 5255–5256
8	Laughlin Constable Affidavit of Mailing	Volume 23 Bates Nos. 5257–5258
9	Answers to Writ of Garnishment Interrogatories	Volume 23 Bates Nos. 5259–5263
10	Email Exchange between Andrea Gandara an Tye Hanseen June 26, 2017 through August 26, 2017	Volume 23 Bates Nos. 5264–5267
11	Email Exchange between Andrea Gandara an Tye Hanseen, November 2017	Volume 23 Bates Nos. 5268–5275
Docket of Case No. A670352		Volume 23 Bates Nos. 5276–5284

1 believe there was one -- again, I'm guessing here.

2 Should I not guess?

3 Q. I want you to estimate.

4 A. Estimate?

5 Q. Sure. Your best estimate.

6 A. There are two loans, I believe: One, I owe
7 personally for about 80 or 90,000. The second one
8 he loaned some money to Roen Ventures.

9 Q. When?

10 A. Maybe a year ago, nine months ago.

11 Q. Okay. And how much was that for?

12 A. \$3.4 million.

13 Q. Okay. So all together -- okay. Are
14 payments being made on that loan?

15 A. I don't know if Mr. Llamas is making
16 interest payments or not. I don't know the term of
17 the loan.

18 Q. Okay. What about the term of your personal
19 loan?

20 A. I forget that one.

21 Q. Are you making payments on it?

22 A. No.

23 Q. Have you ever made payments on it?

24 A. I don't remember. I may have made one
25 payment. I'm not sure.

1 Q. Is Mr. Mahoney pursuing you for payments?

2 A. Not at this time.

3 Q. Is he asking, hey, are you going to pay?

4 A. He's aware of what's going on financially
5 with me. And, again, Jim has done very, very well
6 through MJNA and his company. So I think he's
7 backing off right now, shall I put it.

8 Q. Okay. What is Stix Pix, Inc., S-T-I-X
9 P-I-X, Inc.?

10 A. I don't know.

11 Q. Do you owe them money?

12 A. Not that I'm aware, unless that's an entity
13 or something from Jim Mahoney.

14 Q. Do they owe you money?

15 A. I don't know.

16 Q. Okay. What is Vanilla Sky SA, it's out of
17 Panama?

18 A. I don't know.

19 Q. Do you owe them money?

20 A. No. I owe Jim Mahoney money. That may BE
21 one of his LLCs. I'm not sure.

22 Q. Does Vanilla Sky owe you money?

23 A. No.

24 Q. Again, how much did you personally borrow
25 from Mr. Mahoney?

1 A. Again?

2 Q. Yes.

3 A. 80 to \$90,000 I believe.

4 Q. Looks like there's a \$450,000 loan in June
5 of 2012?

6 A. I told you I was guessing. I made that
7 clear I was guessing.

8 Q. Okay. Is there any written agreement for
9 that loan for Jim Mahoney, the \$80,000 loan?

10 A. The \$80,000 loan?

11 Q. Yes.

12 A. I believe so, yes.

13 Q. Okay. Was that produced?

14 A. I believe it was in those boxes, yes.

15 Q. Okay. So it's my understanding now that
16 you don't own any shares currently in Medical
17 Marijuana, Inc.; is that right or not?

18 A. Correct.

19 Q. Okay. And you originally purchased
20 \$37 million worth of shares in them though, didn't
21 you?

22 A. What's that?

23 Q. Didn't you originally get 37 million shares
24 of Medical Marijuana, Inc.?

25 A. I did not purchase these shares.

- 1 Q. How did you get them?
- 2 A. As stated earlier, I was a consultant for
- 3 them.
- 4 Q. That's right.
- 5 A. I never wrote a penny for shares.
- 6 Q. Okay. And you indicated that you sold out
- 7 of Roen Ventures for a half million dollars; is that
- 8 right?
- 9 A. True.
- 10 Q. When was Roen formed?
- 11 A. Sometime in 2012, I believe.
- 12 Q. Okay. And with whom did you form it?
- 13 A. Michael Llamas.
- 14 Q. That's it?
- 15 A. Correct.
- 16 Q. What was the purpose of that entity?
- 17 A. For investments.
- 18 Q. What kind of investments? Marijuana?
- 19 A. Any investments that made sense. If it was
- 20 marijuana, it was marijuana.
- 21 Q. How much money did you have in 2012 when
- 22 you formed Roen?
- 23 A. No idea.
- 24 Q. How much money did you put into Roen in the
- 25 beginning to capitalize it?

1 A. I think a hundred dollars to start off.
2 I'm not sure. Again, I'd be guessing.

3 Q. So your total capital contribution was
4 somewhere in the neighborhood of a hundred dollars?

5 A. I can't answer that. Don't forget, I got a
6 2.6 loan against it -- or had, I should say. I
7 don't know what the capital investment was in the
8 beginning.

9 Q. Looks like you made four payments to Roen
10 Investments.

11 In April this year, it looks like you paid
12 them \$1,061,000; is that correct?

13 A. I believe that's what we saw earlier.

14 Q. Yes.

15 And, again, what was that for?

16 A. A loan.

17 Q. Okay. And then on April 11th, you -- that
18 was the other part of the 2.6, right, another
19 million dollars?

20 A. If that's what the record states.

21 Q. Okay. In July of this year, July 8th, it
22 looks like you paid \$700,000 to Roen Investments.

23 Do you know what that was for?

24 A. No idea. Obviously, you're going to show
25 me.

1 Q. And then in August of 2013, you paid
2 \$800,000 -- \$300,000 to Roen Investments.

3 Do you know what that was for?

4 A. Same answer.

5 Q. But the bottom line is you paid \$3 million
6 to Roen Investments and you cashed out for a half
7 million dollars?

8 A. I cashed out for half a million dollars of
9 cash compared to a ten-year unsecured note that I do
10 not know if it's going to be worth a penny at the
11 end of ten years.

12 Q. Okay. Do you have any loans outstanding to
13 Roen that they owe you money on?

14 A. Do I have loans outstanding to Roen?

15 Q. Yes.

16 A. The only Roen note was the 2.6 to me, which
17 I no longer own.

18 Q. Okay. Have you made loans to Michael
19 Llamas?

20 A. I don't believe so. I could be wrong.

21 Q. Is he now the sole owner of Roen or is
22 there another owner?

23 A. Bart Mackay took my position in Roen. So
24 now it's Mr. Llamas and Mr. Mackay.

25 Q. Got you.

1 And did Bart Mackay pay for his interest in
2 Roen?

3 A. The check is in the mail.

4 Q. That's the half million?

5 A. Correct.

6 Q. Is Bart Mackay also an owner of CannaVest?

7 A. Bart Mackay owns a lot of stock in
8 CannaVest, yes.

9 Q. Okay. But you have no ownership interest
10 in CannaVest; is that correct?

11 A. I have zero ownership interest. I have an
12 option as being -- as running it for 500,000 shares
13 at \$0.68 a share.

14 Q. Okay. How did you go from real estate
15 development into the medical marijuana sphere?
16 That's an interesting transition.

17 Tell me how it happened.

18 A. Well, I believe every developer in Las
19 Vegas was looking for another occupation when this
20 recession hit, if I'm not mistaken. I can go
21 interview my friends, and every one of them was
22 looking for a new occupation. The party was over.

23 So, fortunately, I met Mr. Llamas through
24 my dispensary that I never opened up. I met him.
25 We started talking. He is well diversified [sic] in

1 the industry, he's been in it, and I was fortunate
2 enough to hook up with him.

3 Q. Okay. But how did you hit upon medical
4 marijuana? There's a lot out there.

5 And I'm not criticizing by any means.
6 Okay?

7 A. I hope not.

8 Q. But it's an interesting transition and I'm
9 wondering how that transition occurred.

10 It wasn't only Mr. Llamas, was it?

11 A. Ask me that same question in five years
12 when it's the biggest industry out there, when it
13 makes prohibition look like nothing, when it makes
14 the computer age look like nothing.

15 Marijuana is going to be the biggest
16 industry in five years that you can deal with it.
17 And if you're intelligent, you would get in on it.

18 Q. Fair enough?

19 A. That's my opinion. I could be wrong. I'm
20 fortunate to be in it.

21 I know right now -- and this is getting off
22 the track, but I want to give you a little
23 education.

24 THE WITNESS: No?

25 MR. MUIJE: That's going far afield, I

1 think.

2 THE WITNESS: Well, it's something that's
3 worth saying.

4 MR. MUIJE: It's worth saying off the
5 record later. If you want to sell him a stock,
6 that's great.

7 THE WITNESS: Let me tell you off the
8 record.

9 MR. HAWLEY: We can go off the record.

10 MR. MUIJE: We can go off the record for a
11 moment.

12 (Thereupon, an off-the-record discussion was had.)

13 BY MR. HAWLEY:

14 Q. Okay. When did your involvement with
15 CannaVest begin?

16 A. Well, Bart Mackay worked for MJNA as a
17 consultant and an attorney. I met him there. So it
18 began when I was involved with MJNA two or three
19 years ago.

20 Q. Okay. And what account is your salary from
21 CannaVest deposited into?

22 MR. MUIJE: Asked and answered.

23 You can answer it again.

24 THE WITNESS: I either give the check to my
25 wife to put in the household account or I did put in

1 the BofA -- Bank of America -- you got me saying
2 BofA now -- the Bank of America account.

3 BY MR. HAWLEY:

4 Q. It's my powers of persuasion.

5 A. That's okay.

6 Q. We talked about \$300,000 you paid to
7 CannaVest last August, didn't we?

8 A. I don't remember that. You mentioned it.

9 Q. What was the purpose of that?

10 A. I don't know.

11 Q. Why did you pay CannaVest \$300,000?

12 A. I don't remember.

13 Q. Where did you get that money?

14 A. Probably off my stock sales. It's the only
15 source I've had.

16 Q. Does Roen Ventures own any part of
17 CannaVest?

18 A. Roen Ventures has the option to either get
19 paid back from CannaVest or to roll its interest
20 over in shares -- its loan over in shares.

21 I have no idea what Mike and Bart are going
22 to do.

23 Q. When does that option become due or when
24 can that be exercised?

25 A. I think they have six months, I believe.

1 Q. From today?

2 A. From a couple months ago. Again, I'm just
3 guessing, which isn't good.

4 Q. What is PhytoSPHERE?

5 A. PhytoSPHERE was a subsidiary of MJNA.

6 Q. What does PhytoSPHERE do?

7 A. PhytoSPHERE had the relationship with the
8 farmers to import the legal hemp and cannabinoids.

9 Q. Okay. Looks like you paid \$135,000 to
10 PhytoSPHERE in 2012; is that correct?

11 A. Who is me?

12 Q. That would be you personally.

13 A. Oh. I don't recall.

14 Q. Do you hold any shares in PhytoSPHERE?

15 A. No. Again, PhytoSPHERE was or is a
16 subsidiary of MJNA. I hold no shares in MJNA.

17 Q. You hold no shares?

18 A. Currently?

19 Q. Yes.

20 A. I have no shares of MJNA.

21 Q. Did you have shares of MJNA?

22 A. Yes.

23 Q. When?

24 A. Up until I sold them to Alpine.

25 Q. Okay. Do you hold shares in any

1 corporation at this time?

2 A. I don't believe so. I have the options, as
3 I've said five times, in CannaVest, which I've not
4 elected to opt. But I don't believe the -- I
5 believe the answer is no.

6 Q. Okay. If you did pay \$135,000 to
7 PhytoSPHERE in 2012, where would you have obtained
8 that money?

9 A. What? I'm sorry.

10 Q. Where would you have obtained that money?
11 Where would you have gotten it?

12 A. Either from shares of stock -- I'm guessing
13 here -- or the loan from Jim Mahoney -- that's what
14 I've been living on -- or monies from Mr. Sifen.

15 I don't know. Those have been my sources.

16 Q. Okay. What about KannaLife, what is that?

17 A. KannaLife is a company --

18 Q. That's K-A-N-N-A-L-I-F-E. I'm sorry.

19 I'm sorry, sir.

20 A. That's okay.

21 And for your information, CannaVest is

22 C-A-N-N-A. KannaLife is K-A-N-N-A.

23 Have I confused you yet?

24 KannaLife is a company that's in the same
25 space as medical marijuana. They have a couple

1 patents that they're working on that are very strong
2 patents for products and things to do in the
3 marijuana field. CannaVest invested. MJNA invested
4 in KannaLife and so did CannaVest.

5 Q. Okay. Do you have any ownership interest
6 in KannaLife?

7 A. None whatsoever.

8 Q. No shares at all?

9 A. None whatsoever.

10 Q. Okay. And do you work for KannaLife in any
11 capacity?

12 A. I'm on their board of directors.

13 Q. Do you get compensated for being on their
14 board of directors?

15 A. No.

16 Q. How did you get to be on their board?

17 A. Well, because CannaVest has a \$750,000
18 investment in KannaLife, and I told them I want to
19 know what's going on in the company.

20 When CannaVest -- when the board of
21 directors decided to invest in KannaLife, they said,
22 we want you on the board to basically baby-sit.

23 Q. Okay. But a member of the board is the
24 only position you hold with KannaLife?

25 In other words, you're not an officer or

1 director or anything like that?

2 A. No, sir.

3 Q. Okay. Where are the shares of KannaLife
4 physically located in the CannaVest realm?

5 Are there physical shares?

6 A. Physical shares for the \$750,000 that's
7 been invested and they're held by the corporate
8 attorney for KannaLife, John Cleary out of Procopio
9 in San Diego.

10 MR. HAWLEY: This would be a good time to
11 break.

12 (Thereupon, a break was taken.)

13 BY MR. HAWLEY:

14 Q. Okay. Your present home on Red Arrow, does
15 that have a mortgage on it?

16 A. Yes.

17 Q. How much is that mortgage for?

18 Well, what's the current balance?

19 A. I have a first and a second.

20 Q. Okay.

21 A. The first I believe it's a million two.

22 The second is 250, I believe -- 250 or 500, one of
23 the two.

24 Q. What's the value of the house?

25 A. Maybe a million six, million five, maybe.

- 1 Q. What do you drive?
- 2 A. 2005 Mercedes.
- 3 Q. Do you own it?
- 4 A. Yes, sir.
- 5 Q. Free and clear?
- 6 A. There's a \$25,000 loan against it to a
- 7 friend of mine about three or four years ago.
- 8 Q. What's the balance on that loan?
- 9 A. \$25,000 plus interest.
- 10 Q. You haven't made any payments?
- 11 A. No.
- 12 Q. Who is the friend?
- 13 A. Tracy Ciccarelli (phonetic).
- 14 Q. Who is Tracy Ciccarelli?
- 15 A. A friend.
- 16 Q. How long have you known her?
- 17 A. Ten years.
- 18 Q. What is the car worth?
- 19 A. Maybe \$35,000. It's eight years old.
- 20 Q. Okay. Does your wife have a car?
- 21 A. My wife leases a Jaguar.
- 22 Q. And does the Mona Family Trust own any
- 23 vehicles?
- 24 A. I don't think so.
- 25 Q. Okay. And you said that the Red Arrow home

1 is the only real property that the Mona Family Trust
2 owns?

3 A. I believe so, yes.

4 Q. Does the Mona Family Trust have any
5 interest in any LLCs or corporations that you know
6 of?

7 A. If they did, again, it goes back to my
8 answer three or four times. When I invested years
9 ago in all these companies, I would invest either
10 through an LLC, sometimes through -- couple times
11 through Mona Family Trust, this or that. So there
12 may be.

13 But, again, if it does, I believe it's
14 very, very minimal, if there is any.

15 Q. Okay. And other than the credit card you
16 showed me earlier -- that was a Capital One account;
17 right?

18 A. Capital One.

19 Q. Do you have any other credit cards in your
20 wallet?

21 A. No.

22 Q. When Mr. Llamas got into Roen, how much did
23 he put?

24 A. I'm sorry. I couldn't hear you.

25 Q. I'm sorry. I --

1 A. Yes.

2 Q. When Mr. Llamas got into Roen, how much of
3 a capital contribution did he make?

4 A. I believe his investment is up to maybe a
5 million five right now. From what I understand,
6 Bart is making him put more funds in as we speak to
7 balance out the capital account.

8 Again, I'm not involved in that. It's
9 Mr. Llamas and Mr. Mackay.

10 Q. What is Mai Dun, M-A-I D-U-N, Limited?
11 What is that?

12 A. That is one of Bart's numerous LLCs.

13 Q. What is its business?

14 A. Bart.

15 Q. Mai Dun. What is that?

16 A. I have no idea.

17 Q. Okay. Something keeps showing up on your
18 tax returns called Stranger Than Fiction, LLC?

19 A. Yes.

20 Q. You initially bought in for \$75,000?

21 A. Yes.

22 Q. What is that?

23 MR. MUIJE: It's stranger than fiction.

24 BY MR. HAWLEY:

25 Q. Let's hear it then.

1 A. That is an LLC that my wife invested in
2 about five or six years ago. From what I
3 understand -- I do know the gentleman; I forget his
4 name -- he was going to do a book on a high profile
5 individual in Las Vegas and it never went through.

6 So Stranger Than Fiction is another loser.

7 Q. Okay. Who was the high profile individual?

8 A. I'm trying to think of his name.

9 Q. With that title, there's more than a few
10 that it could be.

11 A. I forget his name. But it never went
12 through. That was one I told my wife not to do and
13 she did it.

14 I can't complain because of the 20 she told
15 me not to do that I did, she's way ahead of me in
16 the right department. So I really can't complain
17 about that one to her.

18 Q. Then I see a Hamid/Richie throughout the
19 records.

20 What is that?

21 A. Two friends of mine that I invested in -- I
22 was in probably four or five of their investment
23 deals. There was an investment deal here, an
24 investment deal in Arizona, an investment deal in
25 Laughlin that all of them fell through, bankrupt or

1 dried up or no value in them.

2 Q. Okay. And when did you do those deals with
3 those people?

4 A. Over the last six, seven years.

5 Q. Okay. When was the last one?

6 A. No idea. Long time ago when I had money.

7 Q. When one was the last one?

8 A. I have no idea.

9 Q. Okay. Do you still own a property in North
10 Las Vegas?

11 A. I can't hear you.

12 Q. Do you still own a property in North Las
13 Vegas?

14 A. Which property?

15 Q. What is the address here?

16 A. What's the title.

17 Q. The cross-streets are Clayton and Coralie,
18 C-O-R-A-L-I-E.

19 A. I believe that was 20 acres that I -- was
20 it Speedway property?

21 Q. It's 4.86 acres.

22 A. Oh, no. That's lost. That was a five-acre
23 parcel. I believe I was partners with Hamid and
24 Richie on that one. That's gone.

25 There's also a Speedway project that's

1 gone.

2 Q. Tell me about that Speedway project.

3 Where was that?

4 A. Somewhere down near the Speedway, 20 acres
5 that I bought that foreclosed on.

6 Q. When was that?

7 A. Over the last three, four years, five
8 years.

9 Q. Okay. What about Dogtown Road in
10 Coulterville, California?

11 A. Dogtown Road? That was an investment that
12 Roen made in a piece of property up in Northern
13 California.

14 Q. Okay. What was that investment for?

15 A. For hopefully making money.

16 Q. What were you going to do to make money?

17 A. It was one those investments that you buy
18 that hopefully is going to make money in the next
19 few years. It's vacant land.

20 Q. Do you still own that?

21 A. I don't know if Roen still owns it or not.
22 I believe they sold part of it, Roen Ventures.

23 Q. When?

24 A. Last month.

25 Q. Do you know how much they made on it?

1 A. Like \$5,000. I believe Roen paid \$160,000
2 for it and I believe they sold it for 170 -- I
3 believe again.

4 Q. Okay. And then we have McCarran Plaza
5 Suites. There was some condemnation litigation.
6 Tell me about that.

7 A. McCarran Plaza Suite is 18 acres on the
8 corner of Las Vegas Boulevard and the freeway right
9 there. It's on the southeast corner.

10 I bought it in 2002, 2003, for I think
11 \$4.8 million total, and it was worth at one time
12 about \$20 million, a million an acre, maybe a
13 million and a half an acre, and I lost that in
14 bankruptcy.

15 Q. That was 2000?

16 A. Oh, no. So I had to buy it prior. You're
17 right. I believe I bought it '99. I lost it in
18 bankruptcy, yes.

19 Q. Okay.

20 A. Another horror store.

21 Q. What about Rio Grande Falls Avenue in Las
22 Vegas?

23 A. Rio Grande? I believe that was a house
24 that I bought and fixed up and sold.

25 Q. Okay.

1 A. There were like three or four of those.
2 Q. Would it would be the same I guess for Aloe
3 Spirings?
4 A. Probably so, yes. Single-family dwellings.
5 Q. Yes.
6 Do you own any rental properties?
7 A. No.
8 MR. HAWLEY: Okay. Are we done?
9 I think that we're done.
10 MR. MUIJE: Totally?
11 MR. HAWLEY: I think that we are.
12 - - - - -
13
14 (Proceedings concluded at 1:39 p.m.)
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CERTIFICATE OF DEPONENT

PAGE	LINE	CHANGE	REASON
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* * * * *

I, MICHAEL J. MONA, JR., deponent herein, do hereby certify and declare the within and foregoing transcription to be my judgment debtor examination in said action; under penalty of perjury; that I have read, corrected and do hereby affix my signature to said judgment debtor examination.

MICHAEL J. MONA, JR., Deponent

CERTIFICATE OF REPORTER

STATE OF NEVADA)
) SS:
COUNTY OF CLARK)

I, Jackie Jennelle, a Certified Court Reporter, in and for the State of Nevada, do hereby certify: That I reported the judgment debtor examination of MICHAEL J. MONA, JR., commencing on MONDAY, NOVEMBER 25, 2013, at 10:00 a.m.

That prior to being deposed, the witness was Duly sworn by me to testify to the truth. That I thereafter transcribed my said shorthand notes into typewriting and that the typewritten transcript is a complete, true and accurate transcription of my said shorthand notes.

I further certify that I am not a relative or employee of counsel, of any of the parties, nor a relative or employee of the parties involved in said action, nor a person financially interested in the action.

IN WITNESS WHEREOF, I have set my hand in my office in the County of Clark, State of Nevada, this 5th day of December, 2013.

JACKIE JENNELLE, RPR, CCR #809

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Michael Mona

Far West Industries vs. Rio Vista
Nevada, LLC, et al.



Job: 194436

Exhibit: 0000A



CIVIL COVER SHEET A-12-670352-F

Clark County, Nevada

IV

Case No. _____
(Assigned by Clerk's Office)

I. Party Information

Plaintiff(s) (name/address/phone):

Far West Industries

Attorney (name/address/phone):

David S. Lee, Esq.

Lee, Hernandez, Landrum, Garofalo & Blake, APC

7575 Vegas Drive, Suite 150

Las Vegas, Nevada 89128

(702) 880-9750

Defendant(s) (name/address/phone):

Rio Vista Nevada, LLC,

World Development, Inc.,

Bruce Maize,

Michael J. Mona, Jr.

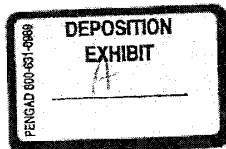
Attorney (name/address/phone):

II. Nature of Controversy (Please check applicable bold category and applicable subcategory, if appropriate)

☐ Arbitration Requested

Civil Cases

Real Property	Torts	
<input type="checkbox"/> Landlord/Tenant <input type="checkbox"/> Unlawful Detainer <input type="checkbox"/> Title to Property <input type="checkbox"/> Foreclosure <input type="checkbox"/> Liens <input type="checkbox"/> Quiet Title <input type="checkbox"/> Specific Performance <input type="checkbox"/> Condemnation/Eminent Domain <input type="checkbox"/> Other Real Property <input type="checkbox"/> Partition <input type="checkbox"/> Planning/Zoning	<input type="checkbox"/> Negligence <input type="checkbox"/> Negligence - Auto <input type="checkbox"/> Negligence - Medical/Dental <input type="checkbox"/> Negligence - Premises Liability (Slip/Fall) <input type="checkbox"/> Negligence - Other	<input type="checkbox"/> Product Liability <input type="checkbox"/> Product Liability/Motor Vehicle <input type="checkbox"/> Other Torts/Product Liability <input type="checkbox"/> Intentional Misconduct <input type="checkbox"/> Torts/Defamation (Libel/Slander) <input type="checkbox"/> Interfere with Contract Rights <input type="checkbox"/> Employment Torts (Wrongful termination) <input type="checkbox"/> Other Torts <input type="checkbox"/> Anti-trust <input type="checkbox"/> Fraud/Misrepresentation <input type="checkbox"/> Insurance <input type="checkbox"/> Legal Tort <input type="checkbox"/> Unfair Competition
Probate	Other Civil Filing Types	
<input type="checkbox"/> Summary Administration <input type="checkbox"/> General Administration <input type="checkbox"/> Special Administration <input type="checkbox"/> Set Aside Estates <input type="checkbox"/> Trust/Conservatorships <input type="checkbox"/> Individual Trustee <input type="checkbox"/> Corporate Trustee <input type="checkbox"/> Other Probate	<input type="checkbox"/> Construction Defect <input type="checkbox"/> Chapter 40 <input type="checkbox"/> General <input type="checkbox"/> Breach of Contract <input type="checkbox"/> Building & Construction <input type="checkbox"/> Insurance Carrier <input type="checkbox"/> Commercial Instrument <input type="checkbox"/> Other Contracts/Agmt/Judgment <input type="checkbox"/> Collection of Actions <input type="checkbox"/> Employment Contract <input type="checkbox"/> Guarantee <input type="checkbox"/> Sale Contract <input type="checkbox"/> Uniform Commercial Code <input type="checkbox"/> Civil Petition for Judicial Review <input type="checkbox"/> Other Administrative Law <input type="checkbox"/> Department of Motor Vehicles <input type="checkbox"/> Worker's Compensation Appeal	<input type="checkbox"/> Appeal from Lower Court (also check applicable civil case box) <input type="checkbox"/> Transfer from Justice Court <input type="checkbox"/> Justice Court Civil Appeal <input type="checkbox"/> Civil Writ <input type="checkbox"/> Other Special Proceeding <input checked="" type="checkbox"/> Other Civil Filing <input type="checkbox"/> Compromise of Minor's Claim <input type="checkbox"/> Conversion of Property <input type="checkbox"/> Damage to Property <input type="checkbox"/> Employment Security <input type="checkbox"/> Enforcement of Judgment <input checked="" type="checkbox"/> Foreign Judgment - Civil <input type="checkbox"/> Other Personal Property <input type="checkbox"/> Recovery of Property <input type="checkbox"/> Stockholder Suit <input type="checkbox"/> Other Civil Matters



III. Business Court Requested (Please check applicable category; for Clark or Washoe Counties only.)

0150

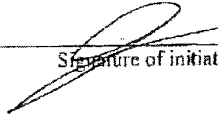
☐ NRS Chapters 78-88
☐ Commodities (NRS 90)
☐ Securities (NRS 90)

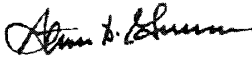
☐ Investments (NRS 104 Art. 8)
☐ Deceptive Trade Practices (NRS 598)
☐ Trademarks (NRS 600A)

☐ Enhanced Case Mgmt/Business
☐ Other Business Court Matters

October 18, 2012

Date


Signature of initiating party or representative



CLERK OF THE COURT

1 **FORJ**
John R. Hawley
2 Nevada Bar No. 001545
LEE, HERNANDEZ, LANDRUM,
3 GAROFALO & BLAKE
7575 Vegas Drive, Suite 150
4 Las Vegas, Nevada 89128
(702) 880-9750
5 Fax; (702) 314-1210
jhawley@leelawfirm.com

6
7 Attorneys for Plaintiff

8 **DISTRICT COURT**
9 **CLARK COUNTY, NEVADA**

10 **FAR WEST INDUSTRIES, a California**
11 **corporation,**

12 **Plaintiff,**

13 **vs.**

14 **RIO VISTA NEVADA, LLC, a Nevada**
limited liability company; **WORLD**
15 **DEVELOPMENT, INC., a California**
corporation; **BRUCE MAIZE, and individual;**
16 **MICHAEL J. MONA, JR., an individual;**
17 **DOES I through 100, inclusive,**

18 **Defendants.**

CASE NO.: A-12-670352-F

IV

APPLICAION OF FOREIGN
JUDGMENT

LEE, HERNANDEZ, LANDRUM,
GAROFALO & BLAKE
7575 VEGAS DRIVE, SUITE 150
LAS VEGAS, NV 89128
(702) 880-9750

19 **AFFIDAVIT OF JOHN R. HAWLEY, ESQ.**

20
21 **STATE OF NEVADA)**

22 **: ss.**

23 **COUNTY OF CLARK)**

24 **COMES NOW, JOHN R. HAWLEY, ESQ., being first duly sworn, and states as follows:**

25 **I. That Affiant is an attorney, duly licensed to practice in the State of Nevada and is a**
26 **member of the law firm of LEE, HERNANDEZ, LANDRUM, GAROFALO & BLAKE.**
27
28

0152

LEE, HERNANDEZ, LANDRUM,
GAROFALO & BLAKE
7575 VEGAS DRIVE, SUITE 150
LAS VEGAS, NV 89128
(702) 880-9730

2. That Affiant is counsel of record for FAR WEST INDUSTRIES, a California corporation in the instant matter.

3. That the name and last known address of the Judgment Debtors herein are as follows:

Michael J. Mona, Jr.
2793 Red Arrow Drive
Las Vegas, NV 89135

Michael J. Mona, Jr., as trustee of the Mona Family Trust dated February 21, 2002
2793 Red Arrow Drive
Las Vegas, NV 89135

4. That the name and address of the Judgment Creditor herein is as follows:

Far West Industries, a California corporation
2922 Daimler Street
Santa Ana, CA 89128

5. That the Judgment herein, a duly exemplified copy of which is attached hereto, is valid and enforceable.

6. That no portion of the Judgment herein has been satisfied.

FURTHER Affiant sayeth naught.

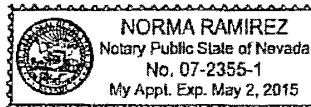
DATED this 18th day of October, 2012.

JOHN R. HAWLEY, ESQ.

SUBSCRIBED and SWORN to

before me this 18th day of
October, 2012.

Norma Ramirez
NOTARY PUBLIC



(SEAL)

EXEMPLIFICATION CERTIFICATE

The documents to which this certificate is attached are full, true and correct copies of the originals on file and of record in my office. All of which we have caused by these presents to be exemplified, and the seal of our Superior Court of California, County of Riverside to be hereunto affixed.



IN WITNESS WHEREOF, I have hereto set my hand
and affixed the Seal of the said Court,

This 7th day of June
Sherri R. Carter
Sherri R. Carter, Clerk
Superior Court of California, County of Riverside

I, Mac R. Fisher, Judge of the Superior
Court of the State of California, in and for the County of Riverside, do hereby certify that
SHERRI R. CARTER whose name is subscribed to the preceding exemplification, is the
Clerk of the said Superior Court of the State of California, in and for the County of
Riverside, and that full faith and credit are due to her official acts. I further certify, that the
seal affixed to the exemplification is the seal of our said Superior Court and that the
attestation thereof is in due form and according to the form of attestation used in this State.

Date June 7, 2012

Mac R. Fisher
Judge of the Superior Court of California
County of Riverside

28 USCA, Sec. 1738
Form No. 334 (1/90; 10/97; 2/99; 3/00; 10/00; 5/01; 1/03; 4/03; 6/03)

0154

FILED
SUPERIOR COURT OF CALIFORNIA
COUNTY OF RIVERSIDE

APR 27 2012

MSJ

APR 30 2012

pr

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF RIVERSIDE, RIVERSIDE COURT

FAR WEST INDUSTRIES, a California
corporation,

Plaintiff,

vs.

RIO VISTA NEVADA, LLC, a Nevada limited
liability company; WORLD DEVELOPMENT,
INC., a California corporation; BRUCE MAIZE,
an individual; MICHAEL J. MONA, JR., an
individual; and DOES 1 through 100, inclusive,

Defendants.

Case No. RIC495966

JUDGE: Hon. Jacqueline Jackson

~~PROPOSED~~ JUDGMENT NUNC PRO
TUNC

Action Filed: March 24, 2008

Trial Date: September 23, 2011

On February 23, 2012, the Honorable Jacqueline Jackson entered Finding of Fact and Conclusion of Law in the above-referenced matter. Based upon those Findings and Conclusion, Judgment is hereby entered in favor of Plaintiff Far West Industries, a California corporation and against the following Defendants, jointly and severally: (1) Michael J. Mona, Jr.; (2) Michael J. Mona, Jr., as Trustee of the Mona Family Trust dated February 21, 2002; (3) Rio Vista Nevada, LLC, a Nevada limited liability company; and (4) World Development, Inc., a California corporation in the amount of \$17,777,562.18. Recoverable court costs of \$25,562.56 and attorney's fees of \$327,548.84 are also awarded to Far West Industries, jointly and severally against all Defendants. The Clerk is hereby directed to enter those amounts on this Judgment following Far West Industries' post-Judgment petition for them. Finally, the Clerk is hereby

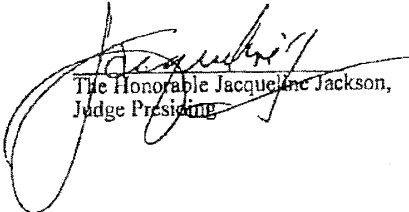
~~PROPOSED~~ JUDGMENT NUNC PRO TUNC

0155

GREEN & HALL
ATTORNEYS AT LAW
RIVERSIDE, CALIFORNIA

1 directed to release the \$32,846 that was interplead by Defendant Fidelity National Title Company
2 to Far West Industries upon entry of this Judgment.

3 Dated: 4/27/12


The Honorable Jacqueline Jackson,
Judge Presiding

GREEN & HALL
ATTORNEYS AT LAW
1100 PINE AVE. SUITE 100
DALLAS, TEXAS 75201

28

2
[PROPOSED] JUDGMENT NUNC PRO TUNC

0156

Michael Mona

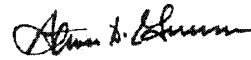
Far West Industries vs. Rio Vista
Nevada, LLC, et al.



Job: 194436

Exhibit: 0000B





CLERK OF THE COURT

1 ORDR
2 JOHN W. MUIJE & ASSOCIATES
3 JOHN W. MUIJE, ESQ.,
4 Nevada Bar No. 2419
5 1320 S. Casino Center Blvd.
6 Las Vegas, Nevada 89104
7 PH: 702-386-7002
8 Fax No: 702-386-9135
9 Email: Jmuije@mujelawoffice.com
10 Attorneys for Judgment debtors Michael J. Mona Jr.,
11 and Michael J. Mona Jr., as trustee of the
12 Monad Family Trust Dated February 21, 2002

DISTRICT COURT

CLARK COUNTY, NEVADA

11 FAR WEST INDUSTRIES, a California
12 corporation,

13 Plaintiff,

14 vs.

15 RIO VISTA NEVADA, LLC, Nevada
16 limited liability company; WORLD
17 DEVELOPMENT, INC., a California
18 corporation; BRUCE MAIZE, and
19 individual; MICHAEL J. MONA, JR., an
20 individual; DOES I through III, and ROE
21 CORPORATIONS I through III, inclusive,

22 Defendants.

Case No. : A-12-670352-F

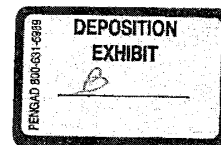
Dept. No.: XXVI

HEARING DATE: SEPTEMBER 18, 2013
HEARING TIME: 9:00 A.M.

23 ORDER

24 This matter came on for hearing on a status check regarding the Court Ordered Examination
25 of Judgment Debtors MICHAEL J. MONA, JR., and MICHEL J. MONA JR., as Trustee of the
26 MONA FAMILY TRUST DATED FEBRUARY 21, 2002, Plaintiff represented by JOHN R.
27 HAWLEY OF the law firm of LEE, HERNANDEZ, LANDRUM, GAROFALO & BLAKE, the
28

- 1 -



0158

LAW OFFICES
JOHN W. MUIJE & ASSOCIATES
1320 S. CASINO CENTER BOULEVARD
LAS VEGAS, NEVADA 89104
Phone: (702) 386-7002 Fax: (702) 386-9135

LAW OFFICES
JOHN W. MUIJE & ASSOCIATES
1320 S. CASINO CENTER BOULEVARD
LAS VEGAS, NEVADA 89104
Phone: (702) 386-1002 Fax: (702) 386-9135

1 appearing defendants represented by JOHN W. MUIJE, ESQ., of the law firm of JOHN W. MUIJE
2 & ASSOCIATES, the Court and Counsel having engaged in discussion regarding the status of said
3 defendants' compliance with the Court's Examination Order and good cause appearing,

4 **IT IS HEREBY ORDERED AND ADJUDGED AND DECREED** that Plaintiff shall
5 return to the offices of counsel for said Defendants the eighteen boxes of documents produced by
6 said Defendants in compliance with this Court's Order on or about September 5, 2013, no later than
7 5:00 p.m. (PDT) on Wednesday, September 25, 2013.

8 **IT IS HEREBY ORDERED AND ADJUDGED AND DECREED** that said Defendants
9 shall complete their production, constituting approximately two additional boxes of documents as
10 represented by said Defendant's counsel, to counsel for Plaintiff, no later than 5:00 p.m.(PDT) on
11 Wednesday, September 25, 2013.



12 **IT IS HEREBY ORDERED AND ADJUDGED AND DECREED** that Plaintiff shall have
13 one week from the delivery of those additional documents, i.e. thru and including 5:00 p.m.
14 Wednesday October 2, 2013, to complete its review and inspection of said two additional boxes of
15 documents, and return the same to the offices of said Defendants counsel.

16 **IT IS HEREBY ORDERED AND ADJUDGED AND DECREED** that the Court also
17 entertained discussion regarding the scope and reasonableness of a sworn debtor examination, and
18 has concluded that said examination shall be conducted over two 8-hour working days, (with suitable
19 and appropriate breaks during said days), on dates mutually agreeable to the parties and counsel, to
20 occur subsequent to October 2, 2013, but no later than November 20, 2013.
21
22
23
24
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27
28


LAW OFFICES
JOHN W. MUIJE & ASSOCIATES
1320 S. CASINO CENTER BOULEVARD
LAS VEGAS, NEVADA 89104
Phone: (702) 386-7002 Fax: (702) 386-9135

1 IT IS FURTHER ORDERED AND ADJUDGED AND DECREED that the court will
2 continue this matter for further status check to occur before the court on December 4, 2013 at the
3 hour of 9:00 a.m., which status check may be unilaterally vacated by the parties to the extent that the
4 document production and examination goes smoothly, and have been completed prior to that date.

5 Dated this 2nd day of October
6 September, 2013.

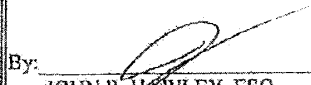
7 
DISTRICT COURT JUDGE
8 

9 Respectfully submitted,
10 JOHN W. MUIJE & ASSOCIATES

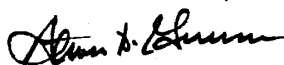
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19 Attorneys for Judgment debtors Michael J. Mona Jr.,
20 and Michael J. Mona Jr., as trustee of the
21 Monad Family Trust Dated February 21, 2002

22 APPROVED AS TO FORM AND CONTENT

23 LEE, HERNANDEZ, LANDRUM,
24 GAROFALO & BLAKE

25 By: 
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Attorneys for FAR WEST INDUSTRIES

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CLERK OF THE COURT

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HOLLEY DRIGGS WALCH
FINE WRAY PUZEY & THOMPSON
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Las Vegas, Nevada 89101
Telephone: 702/791-0308
Facsimile: 702/791-1912

Attorneys for Plaintiff

DISTRICT COURT

CLARK COUNTY, NEVADA

FAR WEST INDUSTRIES, a California
corporation,

Plaintiff,

v.

RIO VISTA NEVADA, LLC, a Nevada limited
liability company; WORLD DEVELOPMENT,
INC., a California corporation; BRUCE MAIZE,
an individual, MICHAEL J. MONA, JR., an
individual; DOES 1 through 100, inclusive,

Defendants.

CASE NO.: A-12-670352-F
Dept. No.: XV

**ORDER FOR EXAMINATION OF
JUDGMENT DEBTOR MICHAEL J.
MONA, JR., INDIVIDUALLY, AND AS
TRUSTEE OF THE MONA FAMILY
TRUST DATED FEBRUARY 12, 2002**

**TO: MICHAEL J. MONA, JR., INDIVIDUALLY, AND AS TRUSTEE OF THE MONA
FAMILY TRUST DATED FEBRUARY 12, 2002**

**THIS PLEADING IS A COMMUNICATION BEING MADE IN AN EFFORT TO
COLLECT A DEBT AND SEEK COMPLIANCE WITH A JUDGMENT. ANY
INFORMATION OBTAINED INCIDENT HERETO WILL BE USED FOR THAT
PURPOSE.**

It appearing to the Court that a Judgment (the "Judgment") was entered on April 27,
2012, in favor of Plaintiff Far West Industries and against Defendant Michael J. Mona, Jr.,
individually ("Mona"), and as Trustee of the Mona Family Trust Dated February 12, 2012 (the
Mona Family Trust") for damages in the amount of \$17,777,562.18, plus costs of \$25,562.56 and
attorney's fees of \$327,548.84. Mona and the Mona Family Trust have failed to satisfy any
amount of the Judgment by paying in full the monetary damages set forth in the Judgment; and
whereas NRS 21.270 provides for an Examination of Judgment Debtor under such

1 circumstances;

2 IT IS HEREBY ORDERED, ADJUDGED AND DECREED that Mona, individually,
3 and as Trustee of the Mona Family Trust ("Judgment Debtor"), appear at the law offices of
4 HOLLEY DRIGGS WALCH FINE WRAY PUZEY & THOMPSON, located at 400 South
5 Fourth Street, Third Floor, Las Vegas, Nevada 89101, on **June 12, 2015, at 10:00 a.m. and May**
6 **29, 2015, at 10:00 a.m.**, to be examined under oath concerning any property which may be used
7 to satisfy said Judgment ("Judgment Debtor Examination") with examination continuing from
8 day to day until completed;

9 IT IS FURTHER ORDERED, ADJUDGED AND DECREED that, in the interim of the
10 Judgment Debtor Examination, the Judgment Debtor be and hereby is forbidden from
11 effectuating any transfer(s) or otherwise disposing of any property not exempt from execution.

12 IT IS FURTHER ORDERED, ADJUDGED AND DECREED that, the Judgment Debtor
13 shall produce at least one week prior to the examination the documents listed on **Exhibit "1"**
14 attached hereto and incorporated herein by reference.

15 IT IS FURTHER HEREBY ORDERED, ADJUDGED AND DECREED that the date
16 and time of the Judgment Debtor Examination may be continued at the Judgment Creditor's
17 discretion so as to accommodate any conflict of schedule which may arise.

18 FAILURE TO APPEAR AT THE TIME AND PLACE OF THE SCHEDULED
19 JUDGMENT DEBTOR EXAMINATION MAY RESULT IN A BENCH WARRANT BEING
20 ISSUED FOR YOUR ARREST.

21 Dated this 13th day of May, 2015.

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23 DISTRICT COURT JUDGE
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28

1 Submitted by:

2 HOLLEY DRIGGS WALCH
3 FINE WRAY PUZEY & THOMPSON

4 By 

5 F. THOMAS EDWARDS, ESQ.
6 Nevada Bar No. 9549
7 400 S. Fourth Street, Third Floor
8 Las Vegas, NV 89101
9 *Attorneys for Plaintiff*

1 **EXHIBIT "1"**

2 **DEFINITIONS**

3
4 The following definitions are to be used with respect to these documents:

5 A. "Document" is defined to be synonymous in meaning and equal in scope to the
6 usage of this term in Nevada Rules of Civil Procedure 34(a), and shall mean any and all
7 information in tangible or other form, whether printed, typed, recorded, computerized, filmed,
8 reproduced by any process, or written or produced by hand, and whether an original, draft,
9 master, duplicate or copy, or notated version thereof, that is in Your possession, custody, or
10 control. A draft or non-identical copy is a separate document within the meaning of this term.

11 B. Document shall also include, but not be limited to, electronic files, other data
12 generated by and/or stored on or through any of Your computer systems and storage media (e.g.,
13 internal or external hard drives, CD-ROM's, floppy disks, backup tapes, thumb drives, internet-
14 based posting boards, or any other data storage media or mechanisms), or any other electronic
15 data. This includes, but is not limited to: email and other electronic communications (e.g.,
16 postings to internet forums, ICQ or any other instant messenger messages, and/or text messages);
17 voicemails; word processing documents; spreadsheets; databases; calendars; telephone logs;
18 contact manager information; Internet usage files; offline storage or information stored on
19 removable media; information contained on laptops or other portable devices; and network
20 access information. Further, this includes data in any format for storing electronic data.

21 C. "Relating or referring" are used in their broadest sense and shall mean and
22 include, but shall not be limited to, advert, allude, comprise, concern, constitute, describe,
23 discuss, mention, note, pertain, quote, recite, recount, reflect, report or state.

24 D. The singular shall include the plural, and the plural shall include the singular. The
25 conjunctive "and" shall include the disjunctive "or" and the disjunctive "or" shall include the
26 conjunctive "and."

27 E. "Judgment Debtor" shall mean and refer to (1) Michael J. Mona, Jr., Individually,
28 and as Trustee of the Mona Family Trust Dated February 12, 2002, and (2) the Mona Family
Trust Dated February 12, 2002, in the Judgment entered on April 27, 2012 by the Superior Court
of the State of California, County of Riverside, Riverside Court in the case of Far West
Industries v. Rio Vista Nevada, LLC, et. al., Case No. RIC495966.

29 F. "You" or "Your" shall mean and refer to (1) Michael J. Mona, Jr., Individually,
and as Trustee of the Mona Family Trust Dated February 12, 2002, and (2) Rhonda Mona, as
Trustee of the Mona Family Trust Dated February 12, 2002.

30 G. Each Document produced pursuant to this Exhibit shall be produced as it is kept
in the usual course of business (*i.e.*, in the file folder or binder in which such Document(s) were
located when the request was served) or shall be organized and labeled to correspond to the
categories of Document(s) requested.

31 H. You are instructed to produce any and all Documents which are in your
possession, custody or control. Possession, custody or control includes constructive possession
whereby you have a right to compel the production of a matter from a third party (including an
agency, authority or representative.)

1 I. To the extent the location of any Document called for by this Exhibit is unknown
2 to you, so state. If any estimate can reasonably be made as to the location of an unknown
3 Document, describe the Document with sufficient particularity so that it can be identified, set
4 forth your best estimate of the Document's location, and describe the basis upon which the
5 estimate is made.

6 J. If any Document request is deemed to call for disclosure of proprietary data,
7 counsel for movant is prepared to receive such data pursuant to an appropriate confidentiality
8 order.

9 K. To the extent the production of any Document is objected to on the basis of
10 privilege, provide the following information about each such document: (1) describe the nature
11 of the privilege claimed (e.g., attorney-client, work product, etc.); (2) state the factual and legal
12 basis for the claim of such privilege (e.g., communication between attorney for corporation and
13 outside counsel relating to acquisition of legal services); (3) identify each person who was
14 present when the document was prepared and who has seen the Document; and (4) identify every
15 other Document which refers to or describes the contents of such Document.

16 L. If any document has been lost or destroyed, the Document so lost or destroyed
17 shall be identified by author, date, subject matter, date of loss or destruction, identity of person
18 responsible for loss or destruction and, if destroyed, the reason for such destruction.

13 ITEMS TO BE PRODUCED

14
15 1. For the period beginning April 2012 through the present date, financial documents of
16 Judgment Debtor, including, but not limited to, but not limited to, statements for
17 checking, savings or other financial accounts, securities brokerage accounts, certificates
18 of deposit, shares in banks, savings and loan, thrift, building loan, credit unions, or
19 brokerage houses or cooperative, and records of income, profits from companies, cash on
20 hand, safe deposit boxes, deposits of money with any other institution or person, cash
21 value of insurance policies, federal and state income tax refunds due or expected, any
22 debt payable to or held by or for Judgment Debtor, checks, drafts, notes, bonds, interest
23 bearing instruments, accounts receivable, liquidated and unliquidated claims of any
24 nature, or any and all other assets.

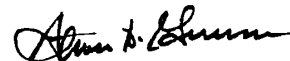
25 2. For the period beginning April 2012 through the present date, Documents relating to
26 closed financial accounts, including, but not limited to checking, savings or other
27 financial accounts, securities brokerage accounts, certificates of deposit, shares in banks,
28 savings and loan, thrift, building loan, credit unions, or brokerage houses or cooperative.

- 1 3. Tax returns and all related tax records of Judgment Debtor for tax years 2011, 2012,
2 2013, and 2014.
- 3 4. Tax returns and all related tax records of Rhonda Mona for tax years 2011, 2012, 2013,
4 and 2014.
- 5 5. For the period beginning April 2012 through the present date, Documents relating to tax
6 deficiencies of Judgment Debtor.
- 7 6. For the period beginning April 2012 through the present date, Documents relating to
8 earnings and/or income, including, but not limited to, compensation paid or payable for
9 services performed by Judgment Debtor, wages, tips, salaries, commissions, bonuses,
10 sales or transfers of assets, and interest earned on financial accounts.
- 11 7. For the period beginning April 2012 through the present date, Documents relating to
12 proof of Judgment Debtor's employment, including, but not limited to, any and all
13 paystubs, retirement slips, contracts for employment, and consulting agreements.
- 14 8. For the period beginning April 2012 through the present date, Documents relating to
15 income, passive income, investment distributions, or other monetary disbursements or
16 distributions Judgment Debtor has received.
- 17 9. For the period beginning April 2012 through the present date, Documents relating to
18 Judgment Debtor's ownership or lease of automobiles, trucks, trailers, and other vehicles,
19 including, but not limited to, Documents relating to vehicle registration, insurance, sales,
20 purchases, or leases.
- 21 10. For the period beginning April 2012 through the present date, Documents relating to
22 stock and interests in any and all corporations or other business entities, whether privately
23 held or publically traded, held by Judgment Debtor, including, but not limited to any and
24 all certificates of stock in CannaVEST Corp.
- 25 11. For the period beginning April 2012 through the present date, Documents relating to
26 interests in any and all partnerships, sole proprietorships, joint ventures, corporations,
27 holding companies and limited liability companies held by Judgment Debtor.
- 28

- 1 12. Documents relating to any and all real property in which Judgment Debtor holds an
2 interest or which Judgment Debtor owns, directly or indirectly, including, but not limited
3 to, mortgages, deeds, leases, assignments, subordination agreements, and finance
4 statements.
- 5 13. Documents relating to any and all tangible or intangible property, including, but not
6 limited to, furnishings, furniture, musical instruments, fixtures, hardware, home
7 accessories, electronics, computers, audio-visual devices, appliances, equipment, jewelry,
8 artwork, antiques, and collections, in which Judgment Debtor holds an interest or which
9 Judgment Debtor owns, directly or indirectly, including, but not limited to, bills of sale,
10 sale receipts, purchase agreements, insurance policies, or promissory notes.
- 11 14. For the period beginning April 2012 through the present date, Documents relating to all
12 commercial and consumer loans which Judgment Debtor applied for, or which Judgment
13 Debtor guaranteed, that were submitted to any individual, bank, lender, financial
14 institution, finance company, other private entity, public agency or governmental
15 administration.
- 16 15. For the period beginning April 2012 through the present date, Documents relating to all
17 monies loaned to Judgment Debtor or financed on Judgment Debtor's behalf, including,
18 but not limited to, any home loan, personal property loan, equity loan, or line of credit.
- 19 16. For the period beginning April 2012 through the present date, Documents relating to any
20 guaranty or assurance of performance made by Judgment Debtor for any contract,
21 agreements, commercial transactions, loans, financing arrangements, notes, mortgages,
22 third party lender agreements, assignments, and subordination agreements of any kind.
- 23 17. For the period beginning April 2012 through the present date, policies of insurance issued
24 in the name of Judgment Debtor and/or under which Judgment Debtor is a beneficiary,
25 including, but not limited to, policies for life insurance, disability insurance, homeowners
26 insurance, automobile insurance, health insurance, flood insurance, umbrella policies,
27 liability insurance, personal property protection, and corporate director and/or officer
28 insurance.

- 1 18. For the period beginning April 2012 through the present date, Documents relating to any
2 indebtedness that was owed to Judgment Debtor or which is still owed to Judgment
3 Debtor by any person or entity, including, but not limited to, agreements, contracts,
4 leases, promissory notes, mortgages, bills of sale, personal guaranties, or judgments.
- 5 19. For the period beginning April 2012 through the present date, Documents relating to any
6 indebtedness that was owed by Judgment Debtor or which is still owed by Judgment
7 Debtor to any person or entity, including, but not limited to, agreements, contracts,
8 leases, promissory notes, mortgages, bills of sale, personal guaranties, or judgments.
- 9 20. For the period beginning April 2012 through the present date, all audited and unaudited
10 financial statements prepared by or on behalf of Judgment Debtor.
- 11 21. For the period beginning April 2012 through the present date, financial affidavits that
12 Judgment Debtor executed at any time for any purpose or reason, including, but not
13 limited to, submissions in court proceedings or other legal matters, governmental
14 compliance, proceedings, or investigation, or applications for loans or other financing.
- 15 22. For the period beginning April 2012 through the present date, Documents relating to total
16 attorney's fees charged to and/or paid by Judgment Debtor.
- 17 23. For the period beginning April 2012 through the present date, Documents relating to
18 monies, gifts, bequests, dispositions, or transfers paid or given to Judgment Debtor
- 19 24. For the period beginning April 2012 through the present date, Documents relating to all
20 residential real property lease or mortgage payments, utility bills, including, but not
21 limited to, cable, telephone, cellular phone, internet, club memberships, credit card
22 statements, and automobile loan or lease payments that were billed to and/or owed by
23 Judgment Debtor
- 24 25. For the period beginning April 2012 through the present date, Documents relating to
25 retirement accounts, pension plans, SEP accounts, profit sharing plans and retirement
26 plans in which Judgment Debtor currently holds an interest
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- 1 26. For the period beginning April 2012 through the present date, Documents relating to all
2 tangible or intangible property or other assets sold, assigned, transferred, or conveyed by
3 Judgment Debtor to any person or entity.
- 4 27. Documents relating to any and all trusts of which Judgment Debtor currently is, or has
5 been for the period beginning April 2012 through the present date, or will be in the
6 future, a beneficiary, future beneficiary, settlor, or trustee.
- 7 28. Documents relating to any and all wills of which Judgment Debtor currently is, or has
8 been for the period beginning April 2012 through the present date, or will be a
9 beneficiary.
- 10 29. Documents evidencing any and all other intangible personal, tangible, and/or real
11 property of Judgment Debtor not already identified in the items set forth above.
- 12 30. Documents relating to the current value of any and all property identified in the items set
13 forth above, including, but not limited to, appraisals and tax assessments
- 14 31. A written inventory of any and all property identified in the items set forth above,
15 including, but not limited to, intangible, personal, tangible, and real property, with each
16 specific item of property listed with a description, location, and current fair market value.
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CLERK OF THE COURT

OJDE
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Attorneys for Plaintiff

DISTRICT COURT

CLARK COUNTY, NEVADA

FAR WEST INDUSTRIES, a California
corporation,

Plaintiff,

v.

RIO VISTA NEVADA, LLC, a Nevada limited
liability company; WORLD DEVELOPMENT,
INC., a California corporation; BRUCE MAIZE,
an individual, MICHAEL J. MONA, JR., an
individual; DOES 1 through 100, inclusive,

Defendants.

CASE No.: A-12-670352-F
Dept. No.: XV

**ORDER FOR EXAMINATION OF
RHONDA MONA AS TRUSTEE OF
JUDGMENT DEBTOR THE MONA
FAMILY TRUST DATED FEBRUARY 12,
2002**

**TO: RHONDA MONA, AS TRUSTEE OF JUDGMENT DEBTOR THE MONA
FAMILY TRUST DATED FEBRUARY 12, 2002**

**THIS PLEADING IS A COMMUNICATION BEING MADE IN AN EFFORT TO
COLLECT A DEBT AND SEEK COMPLIANCE WITH A JUDGMENT. ANY
INFORMATION OBTAINED INCIDENT HERETO WILL BE USED FOR THAT
PURPOSE.**

It appearing to the Court that a Judgment (the "Judgment") was entered on April 27,
2012, in favor of Plaintiff Far West Industries and against Defendant Michael J. Moná, Jr.,
individually ("Moná"), and as Trustee of the Moná Family Trust Dated February 12, 2012 (the
Moná Family Trust") for damages in the amount of \$17,777,562.18, plus costs of \$25,562.56 and
attorney's fees of \$327,548.84. The Moná Family Trust was found to be jointly liable for any
and all damages awarded. During a previous judgment debtor examination of Moná, he
indicated that Rhonda Moná ("Mrs. Moná") is his co-trustee of the Moná Family Trust. Moná

1 and the Mona Family Trust have failed to satisfy any amount of the Judgment by paying in full
2 the monetary damages set forth in the Judgment; and whereas NRS 21.270 provides for an
3 Examination of Judgment Debtor under such circumstances;

4 IT IS HEREBY ORDERED, ADJUDGED AND DECREED that Mrs. Mona, as Trustee
5 of the Mona Family Trust ("Judgment Debtor"), appear at the law offices of HOLLEY DRIGGS
6 WALCH FINE WRAY PUZEY & THOMPSON, located at 400 South Fourth Street, Third
7 Floor, Las Vegas, Nevada 89101, on **June 11, 2015, at 10:00 a.m.**, to be examined under oath
8 concerning any property which may be used to satisfy said Judgment ("Judgment Debtor
9 Examination") with examination continuing from day to day until completed;

10 IT IS FURTHER ORDERED, ADJUDGED AND DECREED that, in the interim of the
11 Judgment Debtor Examination, the Judgment Debtor be and hereby is forbidden from
12 effectuating any transfer(s) or otherwise disposing of any property not exempt from execution.

13 IT IS FURTHER ORDERED, ADJUDGED AND DECREED that, the Judgment Debtor
14 shall produce at least one week prior to the examination the documents listed on **Exhibit "1"**
15 attached hereto and incorporated herein by reference.

16 IT IS FURTHER HEREBY ORDERED, ADJUDGED AND DECREED that the date
17 and time of the Judgment Debtor Examination may be continued at the Judgment Creditor's
18 discretion so as to accommodate any conflict of schedule which may arise.

19 FAILURE TO APPEAR AT THE TIME AND PLACE OF THE SCHEDULED
20 JUDGMENT DEBTOR EXAMINATION MAY RESULT IN A BENCH WARRANT BEING
21 ISSUED FOR YOUR ARREST.

22 Dated this 13th day of May, 2015.

23 Maey Goelfandy
DISTRICT COURT JUDGE
24 mb
25
26
27
28

1 Submitted by:

2 HOLLEY DRIGGS WALCH
3 FINE WRAY PUZEY & THOMPSON

4 By 

5 F. THOMAS EDWARDS, ESQ.
6 Nevada Bar No. 9549
7 400 S. Fourth Street, Third Floor
8 Las Vegas, NV 89101
9 *Attorneys for Plaintiff*

1 **EXHIBIT "1"**

2 **DEFINITIONS**

3 The following definitions are to be used with respect to these documents:

4 A. "Document" is defined to be synonymous in meaning and equal in scope to the
5 usage of this term in Nevada Rules of Civil Procedure 34(a), and shall mean any and all
6 information in tangible or other form, whether printed, typed, recorded, computerized, filmed,
7 reproduced by any process, or written or produced by hand, and whether an original, draft,
8 master, duplicate or copy, or notated version thereof, that is in Your possession, custody, or
control. A draft or non-identical copy is a separate document within the meaning of this term.

9 B. Document shall also include, but not be limited to, electronic files, other data
10 generated by and/or stored on or through any of Your computer systems and storage media (e.g.,
11 internal or external hard drives, CD-ROM's, floppy disks, backup tapes, thumb drives, internet-
12 based posting boards, or any other data storage media or mechanisms), or any other electronic
13 data. This includes, but is not limited to: email and other electronic communications (e.g.,
14 postings to internet forums, ICQ or any other instant messenger messages, and/or text messages);
15 voicemails; word processing documents; spreadsheets; databases; calendars; telephone logs;
16 contact manager information; Internet usage files; offline storage or information stored on
17 removable media; information contained on laptops or other portable devices; and network
18 access information. Further, this includes data in any format for storing electronic data.

19 C. "Relating or referring" are used in their broadest sense and shall mean and
20 include, but shall not be limited to, advert, allude, comprise, concern, constitute, describe,
21 discuss, mention, note, pertain, quote, recite, recount, reflect, report or state.

22 D. The singular shall include the plural, and the plural shall include the singular. The
23 conjunctive "and" shall include the disjunctive "or" and the disjunctive "or" shall include the
24 conjunctive "and."

25 E. "Judgment Debtor" shall mean and refer to (1) Michael J. Mona, Jr., Individually,
26 and as Trustee of the Mona Family Trust Dated February 12, 2002, and (2) the Mona Family
27 Trust Dated February 12, 2002, in the Judgment entered on April 27, 2012 by the Superior Court
28 of the State of California, County of Riverside, Riverside Court in the case of Far West
Industries v. Rio Vista Nevada, LLC, et. al., Case No. RIC495966.

F. "You" or "Your" shall mean and refer to (1) Michael J. Mona, Jr., Individually,
and as Trustee of the Mona Family Trust Dated February 12, 2002, and (2) Rhonda Mona, as
Trustee of the Mona Family Trust Dated February 12, 2002.

G. Each Document produced pursuant to this Exhibit shall be produced as it is kept
in the usual course of business (i.e., in the file folder or binder in which such Document(s) were
located when the request was served) or shall be organized and labeled to correspond to the
categories of Document(s) requested.

H. You are instructed to produce any and all Documents which are in your
possession, custody or control. Possession, custody or control includes constructive possession
whereby you have a right to compel the production of a matter from a third party (including an
agency, authority or representative.)

1 I. To the extent the location of any Document called for by this Exhibit is unknown
2 to you, so state. If any estimate can reasonably be made as to the location of an unknown
3 Document, describe the Document with sufficient particularity so that it can be identified, set
forth your best estimate of the Document's location, and describe the basis upon which the
estimate is made.

4 J. If any Document request is deemed to call for disclosure of proprietary data,
5 counsel for movant is prepared to receive such data pursuant to an appropriate confidentiality
order.

6 K. To the extent the production of any Document is objected to on the basis of
7 privilege, provide the following information about each such document: (1) describe the nature
8 of the privilege claimed (e.g., attorney-client, work product, etc.); (2) state the factual and legal
9 basis for the claim of such privilege (e.g., communication between attorney for corporation and
outside counsel relating to acquisition of legal services); (3) identify each person who was
present when the document was prepared and who has seen the Document; and (4) identify every
other Document which refers to or describes the contents of such Document.

10 L. If any document has been lost or destroyed, the Document so lost or destroyed
11 shall be identified by author, date, subject matter, date of loss or destruction, identity of person
responsible for loss or destruction and, if destroyed, the reason for such destruction.

12 ITEMS TO BE PRODUCED

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14
15 1. For the period beginning April 2012 through the present date, financial documents of
16 Judgment Debtor, including, but not limited to, but not limited to, statements for
17 checking, savings or other financial accounts, securities brokerage accounts, certificates
18 of deposit, shares in banks, savings and loan, thrift, building loan, credit unions, or
19 brokerage houses or cooperative, and records of income, profits from companies, cash on
20 hand, safe deposit boxes, deposits of money with any other institution or person, cash
21 value of insurance policies, federal and state income tax refunds due or expected, any
22 debt payable to or held by or for Judgment Debtor, checks, drafts, notes, bonds, interest
23 bearing instruments, accounts receivable, liquidated and unliquidated claims of any
24 nature, or any and all other assets.

25 2. For the period beginning April 2012 through the present date, Documents relating to
26 closed financial accounts, including, but not limited to checking, savings or other
27 financial accounts, securities brokerage accounts, certificates of deposit, shares in banks,
28 savings and loan, thrift, building loan, credit unions, or brokerage houses or cooperative.

- 1 3. Tax returns and all related tax records of Judgment Debtor for tax years 2011, 2012,
2 2013, and 2014.
- 3 4. Tax returns and all related tax records of Rhonda Mona for tax years 2011, 2012, 2013,
4 and 2014.
- 5 5. For the period beginning April 2012 through the present date, Documents relating to tax
6 deficiencies of Judgment Debtor.
- 7 6. For the period beginning April 2012 through the present date, Documents relating to
8 earnings and/or income, including, but not limited to, compensation paid or payable for
9 services performed by Judgment Debtor, wages, tips, salaries, commissions, bonuses,
10 sales or transfers of assets, and interest earned on financial accounts.
- 11 7. For the period beginning April 2012 through the present date, Documents relating to
12 proof of Judgment Debtor's employment, including, but not limited to, any and all
13 paystubs, retirement slips, contracts for employment, and consulting agreements.
- 14 8. For the period beginning April 2012 through the present date, Documents relating to
15 income, passive income, investment distributions, or other monetary disbursements or
16 distributions Judgment Debtor has received.
- 17 9. For the period beginning April 2012 through the present date, Documents relating to
18 Judgment Debtor's ownership or lease of automobiles, trucks, trailers, and other vehicles,
19 including, but not limited to, Documents relating to vehicle registration, insurance, sales,
20 purchases, or leases.
- 21 10. For the period beginning April 2012 through the present date, Documents relating to
22 stock and interests in any and all corporations or other business entities, whether privately
23 held or publically traded, held by Judgment Debtor, including, but not limited to any and
24 all certificates of stock in CannaVEST Corp.
- 25 11. For the period beginning April 2012 through the present date, Documents relating to
26 interests in any and all partnerships, sole proprietorships, joint ventures, corporations,
27 holding companies and limited liability companies held by Judgment Debtor.
- 28

- 1 12. Documents relating to any and all real property in which Judgment Debtor holds an
2 interest or which Judgment Debtor owns, directly or indirectly, including, but not limited
3 to, mortgages, deeds, leases, assignments, subordination agreements, and finance
4 statements.
- 5 13. Documents relating to any and all tangible or intangible property, including, but not
6 limited to, furnishings, furniture, musical instruments, fixtures, hardware, home
7 accessories, electronics, computers, audio-visual devices, appliances, equipment, jewelry,
8 artwork, antiques, and collections, in which Judgment Debtor holds an interest or which
9 Judgment Debtor owns, directly or indirectly, including, but not limited to, bills of sale,
10 sale receipts, purchase agreements, insurance policies, or promissory notes.
- 11 14. For the period beginning April 2012 through the present date, Documents relating to all
12 commercial and consumer loans which Judgment Debtor applied for, or which Judgment
13 Debtor guaranteed, that were submitted to any individual, bank, lender, financial
14 institution, finance company, other private entity, public agency or governmental
15 administration.
- 16 15. For the period beginning April 2012 through the present date, Documents relating to all
17 monies loaned to Judgment Debtor or financed on Judgment Debtor's behalf, including,
18 but not limited to, any home loan, personal property loan, equity loan, or line of credit.
- 19 16. For the period beginning April 2012 through the present date, Documents relating to any
20 guaranty or assurance of performance made by Judgment Debtor for any contract,
21 agreements, commercial transactions, loans, financing arrangements, notes, mortgages,
22 third party lender agreements, assignments, and subordination agreements of any kind.
- 23 17. For the period beginning April 2012 through the present date, policies of insurance issued
24 in the name of Judgment Debtor and/or under which Judgment Debtor is a beneficiary,
25 including, but not limited to, policies for life insurance, disability insurance, homeowners
26 insurance, automobile insurance, health insurance, flood insurance, umbrella policies,
27 liability insurance, personal property protection, and corporate director and/or officer
28 insurance.

- 1 18. For the period beginning April 2012 through the present date, Documents relating to any
2 indebtedness that was owed to Judgment Debtor or which is still owed to Judgment
3 Debtor by any person or entity, including, but not limited to, agreements, contracts,
4 leases, promissory notes, mortgages, bills of sale, personal guaranties, or judgments.
- 5 19. For the period beginning April 2012 through the present date, Documents relating to any
6 indebtedness that was owed by Judgment Debtor or which is still owed by Judgment
7 Debtor to any person or entity, including, but not limited to, agreements, contracts,
8 leases, promissory notes, mortgages, bills of sale, personal guaranties, or judgments.
- 9 20. For the period beginning April 2012 through the present date, all audited and unaudited
10 financial statements prepared by or on behalf of Judgment Debtor.
- 11 21. For the period beginning April 2012 through the present date, financial affidavits that
12 Judgment Debtor executed at any time for any purpose or reason, including, but not
13 limited to, submissions in court proceedings or other legal matters, governmental
14 compliance, proceedings, or investigation, or applications for loans or other financing.
- 15 22. For the period beginning April 2012 through the present date, Documents relating to total
16 attorney's fees charged to and/or paid by Judgment Debtor.
- 17 23. For the period beginning April 2012 through the present date, Documents relating to
18 monies, gifts, bequests, dispositions, or transfers paid or given to Judgment Debtor
- 19 24. For the period beginning April 2012 through the present date, Documents relating to all
20 residential real property lease or mortgage payments, utility bills, including, but not
21 limited to, cable, telephone, cellular phone, internet, club memberships, credit card
22 statements, and automobile loan or lease payments that were billed to and/or owed by
23 Judgment Debtor
- 24 25. For the period beginning April 2012 through the present date, Documents relating to
25 retirement accounts, pension plans, SEP accounts, profit sharing plans and retirement
26 plans in which Judgment Debtor currently holds an interest
27
28

- 1 26. For the period beginning April 2012 through the present date, Documents relating to all
2 tangible or intangible property or other assets sold, assigned, transferred, or conveyed by
3 Judgment Debtor to any person or entity.
- 4 27. Documents relating to any and all trusts of which Judgment Debtor currently is, or has
5 been for the period beginning April 2012 through the present date, or will be in the
6 future, a beneficiary, future beneficiary, settlor, or trustee.
- 7 28. Documents relating to any and all wills of which Judgment Debtor currently is, or has
8 been for the period beginning April 2012 through the present date, or will be a
9 beneficiary.
- 10 29. Documents evidencing any and all other intangible personal, tangible, and/or real
11 property of Judgment Debtor not already identified in the items set forth above.
- 12 30. Documents relating to the current value of any and all property identified in the items set
13 forth above, including, but not limited to, appraisals and tax assessments
- 14 31. A written inventory of any and all property identified in the items set forth above,
15 including, but not limited to, intangible, personal, tangible, and real property, with each
16 specific item of property listed with a description, location, and current fair market value.
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IN THE SUPREME COURT OF THE STATE OF NEVADA

RHONDA HELENE MONA and
MICHAEL J. MONA, JR.,

Petitioners,

v.

THE EIGHTH JUDICIAL DISTRICT
COURT FOR THE STATE OF
NEVADA, IN AND FOR THE COUNTY
OF CLARK, AND THE HONORABLE
JOE HARDY, DISTRICT JUDGE

Respondents,

and

FAR WEST INDUSTRIES,

Real Party in Interest.

SUPREME COURT NO. 68434

District Court Case No.: A-12-670352-F
Dept. No.: 15

**SUPPLEMENTAL APPENDIX TO REAL PARTY IN INTEREST'S
ANSWERING BRIEF**

**Volume 2 of 4
Pages 0980 - 0997**

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4	Order for Examination of Judgment Debtor Michael J. Mona, Jr., Individually, and as Trustee of the Mona Family Trust Dated February 12, 2001	May 13, 2015	1	0161-0169
5	Order for Examination of Rhonda Mona as Trustee of Judgment Debtor The Mona Family Trust Dated February 12, 2001	May 13, 2015	1	0170-0178
6	Transcript of Judgment Debtor Examination of Rhonda Mona (erroneously named on its face as "Deposition of Rhonda Mona")	June 26, 2015	2	0179-0497
7	Transcript of Judgment Debtor Examination of Michael J. Mona, Jr.	June 30, 2015	3	0498-0979
8	First Amended Complaint , <u>Far West Industries, etc. vs. Michael J. Mona, Jr., etc., et al.</u> , Eighth Judicial District Court Case No. A-15-724490-C	September 16, 2015	4	0980-0997

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1 DISTRICT COURT

2 CLARK COUNTY, NEVADA

3 * * * * *

4

5 FAR WEST INDUSTRIES, a
6 California corporation,

7 Plaintiff,

8 vs. Case No. A-12-670352-F
Dept. No. XV

9 RIO VISTA NEVADA, LLC, a
Nevada limited liability
company; WORLD DEVELOPMENT,
10 INC., a California
corporation; BRUCE MAIZE, an
11 individual; MICHAEL J. MONA,
JR., an individual; DOES 1
12 through 100, inclusive,

13 Defendants.

14

15

16 DEPOSITION OF

17 RHONDA MONA

18 Las Vegas, Nevada

19 June 26, 2015

20 10:31 a.m.

21

22

23 Reported by: Heidi K. Konsten, RPR, CCR
Nevada CCR No. 845 - NCRA RPR No. 816435
24 JOB NO. 252983

25

1 Deposition of RHONDA MONA, Volume 1,
2 taken at 400 South Fourth Street, 3rd Floor, Las
3 Vegas, Nevada, on June 26, 2015, at 10:31 a.m.,
4 before Heidi K. Konsten, Certified Court Reporter
5 in and for the State of Nevada.

6

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1 DEPOSITION OF RHONDA MONA

2 June 26, 2015

3 * * * * *

4

5 MR. COFFING: Judge, Terry Coffing.

6 How are you?

7 JUDGE HARDESTY: Good. How are you?

8 MR. COFFING: I'm well.

9 MR. EDWARDS: And Tom Edwards,

10 Your Honor, on behalf of Far West.

11 MR. COFFING: Terry Coffing on behalf

12 of Rhonda Mona.

13 MR. EDWARDS: So, Your Honor, you

14 heard from us a few weeks ago as it related to a

15 protective order for Mr. Mona. The judgment

16 debtor exam of Mrs. Mona was not in front of you.

17 But the parties were able to work out a time and

18 place, so that's why we're here today.

19 But we've run into a roadblock up

20 front as to the scope of the judgment debtor

21 examination. We identified -- the judgment

22 debtors in this case are Mr. Mona individually and

23 the Mona Family Trust. The trustees of the Mona

24 Family Trust include Mr. Mona and Mrs. Mona. So

25 it would be -- we noticed the judgment debtor exam

1 of Mrs. Mona on that basis.

2 However, the order in and of itself
3 was not that narrow. It said that Mrs. Mona would
4 be examined under oath concerning any property
5 which may be used to satisfy our judgment. Also,
6 we feel there's substantial law in Nevada and
7 elsewhere that says a judgment debtor examination
8 is extraordinarily broad, and much more broad than
9 a regular discovery deposition.

10 We equate this dispute today to sort
11 of a 30(b)(6) deposition dispute. For example, if
12 you identify the topics for a particular
13 corporation, that corporation will produce a
14 witness to testify about those topics, the
15 question being can the questioner ask questions
16 beyond those topics.

17 And the courts have addressed that
18 issue and said, yes, they absolutely can. The
19 only bounds to the questions is relevance or
20 whether it will lead to the discovery of
21 admissible evidence.

22 So despite the fact that Mrs. Mona is
23 here today on behalf of the trust, our questions
24 don't need to be limited to the trust and, for
25 example, can go into community property, which

1 would be subject to execution under our judgment.

2 MR. COFFING: Well, I will -- I will
3 disagree about some of that, Your Honor. This is
4 Terry Coffing.

5 Your Honor, I'm looking at the order
6 and notice and the order for the examination of
7 Rhonda Mona as trustee of Judgment Debtor Mona
8 Family Trust. That is how she's appearing today.
9 She is a former trustee, but we're going to
10 bring -- we brought her anyways, because she was a
11 trustee at the time the judgment was entered.

12 This trust has one asset. It's an
13 asset that is well-known to the debtors -- or, I'm
14 sorry, the judgment creditor, and it's the
15 personal -- it's the family residence.

16 And so in accordance with the notice,
17 there was a document production that was
18 requested. We timely filed objections to some of
19 those documents, and at the same time produced a
20 pretty hefty couple of thousand pages of
21 documentation in order to comply, which -- the
22 same documents we're using for Mr. Mona's judgment
23 debtor exam, which will take place next week.

24 But my issue is this is noticed as a
25 judgment debtor exam, not a deposition under Rule

1 61. And I don't want, and I don't think it's fair
2 to Mrs. Mona, to allow the debtor to have what
3 amounts to be multiple avenues to get sworn
4 testimony when -- when she's been noticed here in
5 a very limited capacity.

6 So I've offered up the possibility of
7 doing this one time under a deposition notice.
8 And for a variety of reasons, all of which are
9 reasonable, that's not on the table today. So our
10 position is Ms. Mona is here as a trustee. We've
11 prepared her in accordance with the notice of the
12 trust.

13 And now my understanding -- and
14 Mr. Edwards and I have been debating this -- is
15 they want to go outside that notice, ask her
16 questions about her individual finances, which are
17 not subject to the -- to a judgment, and community
18 assets that may or may not be subject to -- that
19 are beyond the scope of the notice and, candidly,
20 what she's prepared for.

21 And so I'm not saying that they can't
22 ask the questions. What I don't want to be is in
23 a situation where they get multiple opportunities
24 to put her through the exact same line of
25 questioning, one under the guise of a judgment

1 debtor exam, one under the guise of a Rule 61
2 deposition, when in reality -- you know, if that's
3 what we're going to do, then let's do it one time,
4 let me prepare her for that, and move forward.

5 But I don't think it's fair to notice
6 her up as a trustee and then ask questions that
7 are beyond the scope of the notice and her
8 preparation for that notice.

9 MR. EDWARDS: And if I could,
10 Your Honor, I -- I disagree that this is beyond
11 the scope of the notice in the sense that the
12 notice in and of itself says the examination will
13 concern any property which may be used to satisfy
14 the judgment. It's not limited to property of the
15 trust.

16 JUDGE HARDESTY: Do we have a -- a
17 copy of the notice?

18 MR. COFFING: I'm looking at one.

19 JUDGE HARDESTY: Was it -- was it
20 filed?

21 MR. COFFING: Yes. It looks -- no,
22 it says E-Served.

23 Does that mean it was filed, Tom?

24 MR. EDWARDS: You should find it on
25 the docket, Your Honor, on May 13, 2015.

1 JUDGE HARDESTY: Okay. Bear with me.

2 MR. COFFING: Tom, the amendment was
3 just to change the time?

4 MR. EDWARDS: Date and time, right.

5 JUDGE HARDESTY: Okay. So I guess I
6 have pulled up the order for examination of
7 Judgment Debtor Michael J. Mona, Jr., individually
8 and as trustee.

9 Is that the one I'm looking for, or
10 is it a different one?

11 MR. EDWARDS: You'll find one for
12 Rhonda Mona as trustee.

13 JUDGE HARDESTY: Okay. Got it.
14 Okay. Bear with me.

15 Okay. Mr. Edwards, continue.

16 MR. EDWARDS: Okay. And beyond that,
17 as to the multiple bites of the apple, first, it's
18 important to understand that we're not in a
19 typical lawsuit where I would only have one bite
20 at the apple. Here we're trying to execute on a
21 judgment.

22 I certainly do not intend to recall
23 Mrs. Mona with a deposition notice a month from
24 now. I intend to get it all done now. Now, in
25 the future, obviously I can't waive my right to

1 take her judgment debtor exam or notice her
2 deposition again as it relates to the assets,
3 because circumstances change. And, frankly, in an
4 estate as complicated as the estate of Mr. and
5 Mrs. Mona, they have a lot of businesses, a lot of
6 transactions, I -- there will be probably multiple
7 examinations until this -- this \$20 million
8 judgment is satisfied.

9 However, that is certainly not my
10 intent today, is to take a judgment debtor exam
11 and then plow the same grounds a month from now.
12 And to the extent I start to do that, I would
13 welcome Mr. Coffing to bring it to your attention
14 so we can address it. But that's certainly not my
15 intent. I was hoping to get it all done today.

16 JUDGE HARDESTY: So I guess my
17 question is what -- I'm not sure what exactly
18 either side exactly wants me to do.

19 MR. COFFING: Well -- go ahead.

20 MR. EDWARDS: I think the question
21 is, are my questions today required to be limited
22 to the assets of the trust, or am I entitled to go
23 into any assets: Assets of the trust, assets of
24 the community property, assets that Mrs. Mona
25 claims are her individual property? Those are the

1 two positions, I think.

2 MR. COFFING: Well, and that was the
3 subject of our objections, is that we're not here
4 to talk about her individual property. It says
5 the examination of Rhonda Mona as trustee of
6 judgment debtor. Rhonda Mona, an individual, is
7 not a judgment debtor in this case.

8 And so she has rights that relate to
9 that, and candidly, we've prepped her regarding
10 questions related to the trust, which are fair
11 game. And I'm allowed -- I mean, certainly I'm
12 not going to -- I would have some latitude there.

13 But if we're going to delve into what
14 amounts to be a full-blown examination of Rhonda
15 Mona about her personal assets, that simply wasn't
16 on the table today, and I don't think it's fair to
17 put her through that right now.

18 MR. EDWARDS: Your Honor, if I could,
19 I would like to just quote a -- a passage from a
20 district of Nevada case, a federal case. It says
21 where spouses --

22 JUDGE HARDESTY: Before you do that,
23 Mr. Edwards, what's the citation?

24 MR. EDWARDS: The citation is 2013
25 Westlaw, 141 3024, and the name -- the name of the

1 case is VFS Finance, Inc., the specialty finance
2 court.

3 JUDGE HARDESTY: Okay. Bear with me
4 before you start reading. Okay.

5 MR. EDWARDS: And just to address the
6 point Mr. Coffing made about the -- that we
7 shouldn't be able to get into Ms. Mona's personal
8 assets, this case addressed the issue and said
9 where spouses are involved, even a slight showing
10 that there's been a transfer of property from the
11 debtor spouse to the other spouse is sufficient
12 for the court to allow a judgment creditor to
13 delve into the personal assets of the nondebtor
14 spouse.

15 And I don't think Mr. Coffing would
16 dispute with me that there are transfers between
17 Mr. Mona and Mrs. Mona. And for that reason we
18 should be allowed to delve into the personal
19 assets of Mrs. Mona, in addition to her community
20 property assets, which are, I think without
21 dispute, subject to the execution of the -- upon
22 judgment.

23 MR. COFFING: The dilemma is --
24 Your Honor, is that's not what was noticed for
25 today. And so you can imagine if I'm talking to

1 my client and preparing her for questions related
2 to the trust and her role as trustee of the trust,
3 she's ready to roll on that. But to now say we're
4 going to go after personal things and talk about
5 that, I, at a minimum, would like an opportunity
6 to brief the issue to you and -- before it
7 becomes, you know, a problem, so we're not having
8 you on the phone for this all day long.

9 But from our perspective, I'm asking
10 that the questioning today be limited to the -- as
11 the notice says, the Mona Family Trust and her
12 role as trustee of that trust, because that's what
13 it was -- that's what we're here for.

14 If you'll give us the opportunity to
15 brief the issue, we'll brief the issue. And they
16 do -- I'm not going to dispute the right that they
17 have the ability to bring her back for a
18 full-blown deposition on a variety of matters.
19 But I haven't had the opportunity to brief this
20 issue for you until it's -- it's here in front of
21 us today.

22 MR. EDWARDS: And, Your Honor, one
23 quick point, and then I'll stop talking, because
24 I'm starting to repeat myself. But if you take a
25 look at the judgment debtor exam notice, it says I

1 get to ask about any property which may be used to
2 satisfy the judgment. It doesn't specify any
3 particular property that I'm allowed to ask
4 questions about.

5 As to the issue of briefing, we do
6 have a bench brief ready for you on this issue,
7 because Mr. Coffing and I have been discussing
8 this for a few days. My concern with that is that
9 my client sees this as a delay effort. And if we
10 have to wait for briefing, my clients are
11 concerned they may be prejudiced with the delays.

12 MR. COFFING: Well, on that issue, if
13 I could, Your Honor, there were no efforts to
14 collect this judgment until, you know, over a year
15 after it was entered. They have a current wage
16 garnishment on a significant salary, and so I'm
17 not sure if -- if there's something that occurs in
18 the next three weeks or two weeks it takes us to
19 brief this, I'm certain that that will be brought
20 to your attention and you will give it the -- the
21 attention it's due.

22 MR. EDWARDS: The dilemma there
23 being, Your Honor, that would mean I have to fight
24 another fraudulent transfer action for the next
25 three years to try to get that money back. It

1 is -- it is what we're doing in front of Judge
2 Gonzales right now, and I would hate to have to do
3 it again for another transfer.

4 JUDGE HARDESTY: Okay. Thank you
5 both, you know, for -- for setting forth the
6 issues succinctly and allowing me time to pull up,
7 you know, the notice and the case.

8 I'm not sure exactly whether I can
9 give you any real specific order, so if -- I'll
10 give you my -- my general ruling right now. And
11 if -- you know, if specific issues come up during
12 the examination, you're welcome to call back, but
13 hopefully -- hopefully this general order will
14 give you both some guidance.

15 The Court is fairly familiar with the
16 scope of judgment debtor exams and the like and
17 collection of judgment and the scope that is
18 permitted. The Court does find that that scope,
19 if you will, is as Mr. Edwards argued, very broad
20 in nature.

21 And so with that background, the
22 Court, examining the May 13 order for examination
23 of Rhonda Mona as trustee of judgment debtor, the
24 Mona Family Trust dated February 12, 2002, it is
25 for Mrs. Mona as trustee of the Mona Family Trust,

1 which at first glance would seem to -- to limit
2 the scope.

3 However, as pointed out, the
4 substance or nature of the examination as set
5 forth, continuing on, states, quote, to be
6 examined under oath concerning any property which
7 may be used to satisfy said judgment, with the
8 examination continuing from day to day until
9 completed.

10 The Court finds that that is the
11 notice of the scope of the examination of
12 Mrs. Mona as trustee of the Mona Family Trust, and
13 therefore the judgment creditors are entitled to
14 ask Mrs. Mona questions concerning any property
15 which may be used to satisfy said judgment and not
16 limited to any property of the Mona Family Trust.
17 So the questions need not be limited to questions
18 regarding assets of the trust.

19 MR. COFFING: Well, Your Honor, would
20 that include assets that are then in Ms. Mona's
21 separate name when she's not a judgment debtor
22 here? And -- and I understand that they're
23 entitled to ask questions in order to satisfy
24 them, but Ms. Mona has her own rights here, as
25 well, and she is not a debtor in this case.