

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20

IN THE SUPREME COURT OF THE STATE OF NEVADA

HERMAN WILLIAMS,

Appellant,

vs.

NADINE WILLIAMS,

Respondent.

No.: 83263

APPELLANT'S
Volume 5

Electronically Filed
Feb 26 2022 10:49 a.m.
Elizabeth A. Brown
Clerk of Supreme Court

TABLE OF CONTENTS

Addendum to Reply to Opposition and Countermotion 162 (Vol. 1)

Answer and Counterclaim for Divorce and
UCCJEA Declaration 13 (Vol. 1)

Behavior Order 251 (Vol. 2)

Case and Non-Jury Trial Management Order 247 (Vol. 2)

Certificate of Service 50 (Vol. 1)

Certificate of Service 93 (Vol. 1)

Certificate of Service 165 (Vol. 1)

Certificate of Service 307 (Vol. 2)

Certificate of Service 308 (Vol. 2)

Certificate of Service 359 (Vol. 2)

Certificate of Service 383 (Vol. 2)

1	Certificate of Service.....	435 (Vol. 3)
2	Complaint for Divorce and UCCJEA Declaration	
3	(With Children)	1 (Vol. 1)
4	Decision and Order	1293 (Vol. 7)
5	Defendant’s EDCR 5.513 Motion for Reconsideration of the Decision and Order	
6	Entered February 9, 2021, or in the Alternative, for a New Trial Pursuant	
7	to NRCJ 59, or [Additionally] in the Alternative Relief from a Judgement,	
8	and for Attorney Fees and Costs	1405 (Vol. 8)
9	Defendant’s Reply to Plaintiff’s Opposition to Defendant’s Motion and	
10	Opposition to Plaintiff’s Countermotion	1458 (Vol. 8)
11	Ex Parte Application for an Order to Show Cause	331 (Vol. 2)
12	Ex Parte Application for an Order to Show Cause.....	355 (Vol. 2)
13	Ex Parte Motion for an Order Shortening Time	305 (Vol. 2)
14	Ex Parte Motion for an Order Shortening Time	329 (Vol. 2)
15	Ex Parte Motion for an Order Shortening Time.....	353 (Vol. 2)
16	Ex Parte Motion for Return of Children	300 (Vol. 2)
17	Exhibits in Support of Defendant’s Opposition	
18	and Countermotion	509 (Vol. 3)
19	Exhibits in Support of Reply to Opposition	102 (Vol. 1)
20	Financial Disclosure Form [Father]	42 (Vol. 1)

1	Financial Disclosure Form [Father]	427 (Vol. 3)
2	Financial Disclosure Form [Father]	562 (Vol. 3)
3	Financial Disclosure Form [Mother]	416 (Vol. 3)
4	Financial Disclosure Form [Mother]	544 (Vol. 3)
5	Financial Disclosure Form [Mother]	588 (Vol. 3)
6	Miscellaneous: Labor Day Weekend and Saturday Visit	288 (Vol. 2)
7	Motion / Opposition Fee Information Sheet	1422 (Vol. 8)
8	Motion for an Order to Enforce and / or for an Order to Show Cause Regarding	
9	Contempt	320 (Vol. 2)
10	Motion for an Order to Enforce and / or for an Order to Show Cause Regarding	
11	Contempt	345 (Vol. 2)
12	Motion for an Order to Show Cause Regarding Contempt and to Enforce Child	
13	Custody and / or Visitation	293 (Vol. 2)
14	Motion for Contempt and for Attorney’s Fees	477 (Vol. 3)
15	Motion for Mandatory Counseling for Minor Children	155 (Vol. 1)
16	Motion for Orders for Temporary	
17	Custody [and for Related Relief]	29 (Vol. 1)
18	Notice of Appeal	1485 (Vol. 8)
19	Notice of Entry of Decision and Order	1348 (Vol. 8)
20	Notice of Entry of March 19, 2020 Minute Order	533 (Vol. 3)

1	Notice of Entry of Order [for Order from August 26, 2019]	333 (Vol. 2)
2	Notice of Entry of Order [for Order from December 16, 2019]	491 (Vol. 3)
3	Notice of Entry of Order [for Order from January 22, 2020]	528 (Vol. 3)
4	Notice of Entry of Order [for Order from June 10, 2021]	1481 (Vol. 8)
5	Opposition and Countermotion	495 (Vol. 3)
6	Opposition to Motion and Countermotion	360 (Vol. 2)
7	Opposition to Motion for Order for Temporary Custody [and for Related	
8	Relief]; Countermotion	51 (Vol. 1)
9	Order for Service by Publication	11 (Vol. 1)
10	Order from August 26, 2019 Hearing	309 (Vol. 2)
11	Order from December 16, 2019 Hearing	488 (Vol. 3)
12	Order from January 22, 2020 Hearing	524 (Vol. 3)
13	Order from June 10, 2021 Hearing	1477 (Vol. 8)
14	Order Setting Civil Non-Jury Trial	541 (Vol. 3)
15	Plaintiff’s Opposition to Defendant’s Motion	
16	and Countermotion	1423 (Vol. 8)
17	Pretrial Memorandum.....	575 (Vol. 3)
18	Pretrial Memorandum	608 (Vol. 3)
19	Proof of Service	384 (Vol. 2)
20	Proof of Service	436 (Vol. 3)

1	Proof of Service	640 (Vol. 4)
2	Proof of Service	674 (Vol. 4)
3	Proof of Service	1440 (Vol. 8)
4	Proof of Service (Motion for Contempt /	
5	Order to Show Cause)	357 (Vol. 2)
6	Reply to Counterclaim	27 (Vol. 1)
7	Reply to Opposition and Countermotion	94 (Vol. 1)
8	Stipulation and Order to Continue Evidentiary Hearing	538 (Vol. 3)
9	Transcript [July 22, 2019]	166 (Vol. 2)
10	Transcript [August 26, 2019]	256 (Vol. 2)
11	Transcript [December 16, 2019]	386 (Vol. 3)
12	Transcript [January 22, 2020]	439 (Vol. 3)
13	Transcript [February 4, 2021]	555 (Vol. 3)
14	Transcript [February 11, 2021]	676 (Vol. 3)
15	Transcript [June 10, 2021]	1468 (Vol. 6)
16	Trial Exhibits (Plaintiff).....	861 (Vol. 5)
17	Trial Exhibits A-FFB (Defendant)	891 (Vol. 6)
18	Trial Exhibits GGB-YY (Defendant).....	1136 (Vol. 7)
19	Trial Form	860 (Vol. 5)

20

1 TRANS

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

FILED

JAN 11 2022

Alanna A. Johnson
CLERK OF COURT

COPY

**EIGHTH JUDICIAL DISTRICT COURT
FAMILY DIVISION
CLARK COUNTY, NEVADA**

NADINE ALECIA WILLIAMS,)
)
Plaintiff,) CASE NO. D-16-586291-D
)
vs.) DEPT. I
)
HERMAN GEORGE WILLIAMS,) APPEAL NO. 83263
)
Defendant.) **(SEALED)**

BEFORE THE HONORABLE SUNNY BAILEY
DISTRICT COURT JUDGE

TRANSCRIPT RE: NON-JURY TRIAL

THURSDAY, FEBRUARY 11, 2021

APPEARANCES:

The Plaintiff: NADINE ALECIA WILLIAMS (Tel.)
For the Plaintiff: FRANK J. TOTI, ESQ. (Tel.)
6900 Westcliff Drive, #500
Las Vegas, Nevada 89145
(702) 364-1604

The Defendant: HERMAN GEORGE WILLIAMS (Tel.)
For the Defendant: KENNETH M. ROBBINS, ESQ. (Tel.)
9205 W. Russel Rd., #240
Las Vegas, Nevada 89148
(702) 608-2331

1 LAS VEGAS, NEVADA

THURSDAY, FEBRUARY 11, 2021

2 P R O C E E D I N G S

3 (The following transcript contains multiple indiscernibles
4 due to poor recording quality)

5 (THE PROCEEDINGS BEGAN AT 9:14:15)

6
7 THE CLERK: We're on the record.

8 THE COURT: Thank you. At this time we are on the
9 record of Williams v. Williams. This is D-586291. Mr. Toti,
10 can you please give your appearance for the record and that of
11 your client?

12 MR. TOTI: Judge, Frank Toti, bar number 5804, here
13 virtually with my client Nadine Williams.

14 THE COURT: Thank you. And Mr. Robbins, appearance
15 for the record and that of your client. Oh, you're on mute,
16 sir.

17 MR. ROBBINS: Sorry. Kenneth Robbins, bar number
18 13572, for Herman Williams who is also present in my office.

19 THE COURT: All right. And I did review over the
20 pretrial memorandums. This is a case where we have issues of
21 divorce and custody. I believe that we can actually take care
22 of some of the preliminaries which is that the -- there's no
23 dispute the parties were married on March 2nd, 2004. There's
24 no dispute both parties want a divorce and that there are four

1 children, Abigail Williams, born October 7, 2004, she's 16
2 years old, Herman Williams II, born on August 24th, 2008, 12
3 years old, Matthew Williams, born on May 13, 2010, 10 years
4 old, and Elisha Williams, born on April 26th, 2013, seven
5 years old. Is that correct Counsel so we can go ahead and --

6 MR. ROBBINS: It --

7 THE COURT: -- agree with that?

8 MR. ROBBINS: Yes. The -- the one child is Elisha.

9 THE COURT: Elisha. I'm sorry. I was looking at
10 that and I could not figure that one out. Thank you. All
11 right. So that's what we have at this point and do we have a
12 brief opening statement, Mr. Toti?

13 MR. TOTI: Judge, if you've read the pretrial
14 memorandum, I would waive my opening.

15 THE COURT: Thank you. Mr. Robbins?

16 MR. ROBBINS: I can waive mine as well. Your Honor,
17 before we get started, also I -- I would let you know that we
18 do have one witness that is currently in my office. If
19 there's no objection then she can stay in. If Mr. Toti would
20 like her to wait --

21 THE COURT: Mr. Toti --

22 MR. ROBBINS: -- outside --

23 THE COURT: -- Exclu -- are you invoking the
24 Exclusionary Rule?

1 MR. TOTI: In that regard, yes, Judge.

2 THE COURT: Okay. And -- and the Exclusionary Rule
3 is hereby invoked. So yes, they will have to wait in another
4 room.

5 MR. ROBBINS: Okay. You can wait --

6 THE COURT: Thank you. All right. So at this
7 point, Mr. Toti, are we waiting for your exhibit still? Oh,
8 we've had them now.

9 THE CLERK: I forwarded it to you, Your Honor.

10 THE COURT: And --

11 MR. TOTI: Okay.

12 THE COURT: And I'm assuming that the trial
13 exhibits, Mr. Robbins, you have received them as well from Mr.
14 Toti?

15 MR. ROBBINS: Yes, I have theirs.

16 THE COURT: Okay. Let me just go ahead and make
17 sure that I have -- I have the exhibit list. All right. Let
18 me just make sure they're saved in the right location so I can
19 find them. It'll be quicker if I can put them in the place
20 where we can find them easier. All right. At this point, Mr.
21 Toti, can you call your first witness?

22 MR. TOTI: Yes, Judge. I'll call my client.

23 THE COURT: All right. And can you go ahead and
24 raise your right arm so we can see a little bit more there?

1 Make sure we can see you raising your right arm, please.
2 There we go. Go ahead.
3 MR. ROBBINS: And --
4 THE CLERK: You do --
5 MR. ROBBINS: -- sorry, Your Honor --
6 THE CLERK: -- swear that --
7 THE COURT: Oh, hold --
8 THE CLERK: -- the testimony --
9 THE COURT: Hold on a second.
10 THE CLERK: -- you're about to give in this action
11 shall be the truth, the whole truth, and nothing but the truth
12 so help you God?
13 THE PLAINTIFF: Yes.
14 THE COURT: And hold on, Mr. Toti.
15 MR. TOTI: Go ahead, Kenneth.
16 THE COURT: Mr. Robbins had a comment?
17 MR. ROBBINS: I believe that there was a -- there's
18 -- there's stipulation to admit all of our exhibits.
19 THE COURT: Oh, that will help. And was there a
20 likewise stipulation in -- in terms of --
21 MR. ROBBINS: And --
22 THE COURT: -- Mr. Toti's?
23 MR. ROBBINS: -- there was only -- only one I would
24 object to is number 6.

1 THE COURT: All right.

2 THE CLERK: I'm sorry --

3 THE COURT: So Mr. Toti --

4 THE CLERK: -- I couldn't hear that. You object to
5 what?

6 THE COURT: Number 6.

7 THE CLERK: Okay.

8 THE COURT: Number 6. So when we get to number 6,
9 Mr. Toti, just be aware that's the only one that has not been
10 stipulated to.

11 MR. TOTI: Yes, Judge.

12 THE COURT: Thank you. Go ahead and proceed.

13 MR. TOTI: Okay. Thank you, Judge.

14 NADINE WILLIAMS

15 called as a witness on her own behalf, having been first duly
16 sworn, testified upon her oath as follows on:

17 DIRECT EXAMINATION

18 BY MR. TOTI:

19 Q State your name for the record.

20 A Nadine Williams.

21 MR. TOTI: Did you hear her okay, Judge?

22 THE COURT: She's a little soft spoken. So Ms.
23 Williams, we're going to need you almost to shout just to make
24 sure we get you all set up, okay? Go ahead.

1 A Nadine Williams.

2 Q Okay. And Nadine, state your current address.

3 A 284 Harpers Ferry Avenue, Las Vegas 89148.

4 Q Okay. How long have you resided in Clark County,
5 Nevada?

6 A For the past six years.

7 Q Okay. And is it your intent to remain in Clark
8 County, Nevada for at least an indefinite period of time?

9 A Yes.

10 Q Okay. And you are the Plaintiff in this action; is
11 that correct?

12 A Yes.

13 Q And you initiated this action a couple years ago,
14 correct?

15 A Yes.

16 Q Okay. And you are seeking a divorce from Herman; is
17 that correct?

18 A Yes.

19 Q And you can see Herman on the screen there, he's the
20 Defendant?

21 A Yes.

22 Q Okay. Is it true and correct that your and Herman's
23 likes and dislikes and passions have become so divergent that
24 it is impossible for the two of you to remain husband and

1 wife?

2 A Yes.

3 Q Is it true and correct that the two of you are not
4 currently residing together?

5 A Yes.

6 Q Is it true and correct that there is no possibility
7 of a reconciliation?

8 A Yes.

9 Q Is it true and correct that you are asking that the
10 Court grant you a divorce this day?

11 A Yes.

12 Q Is it true and correct that you are not currently
13 pregnant?

14 A Yes.

15 Q Okay. And the Judge had set forth that there are
16 four children -- well, strike that. You and Herman were
17 married approximately when?

18 A March 2nd, 2004.

19 Q Okay. And you were married where?

20 A Bronx, New York.

21 Q Okay. And how long -- strike that. When did you
22 and Herman and the children relocate to Clark County, Nevada?

23 A The children and I relocated to Clark County
24 September of 2015. He later followed -- he brought the kids

1 because I just came with Elisha and my mother. And he brought
2 the three older ones about two weeks later.

3 Q Okay. And then from that point forward to present
4 the -- the -- you and the -- you, Herman, and the four
5 children resided in Clark County, Nevada.

6 A No. He was absent from Clark County numerous times
7 because he did not reside here continuously. He was in New
8 York for periods of up to seven months.

9 Q Okay. And when did Herman last travel to New York?
10 It was for -- it was for work I'm assuming?

11 A For work.

12 Q Okay. So when did he cease working in New York and
13 reside in Clark County full-time?

14 A He came back in November of 2018.

15 Q Okay. So continually living in Nevada all of you as
16 a family since November of 2018.

17 A Yes.

18 Q Okay. And what does Herman do for work here in
19 Nevada?

20 A He has a tow truck company that he works as an
21 independent contractor.

22 Q Okay. And the tow truck company is -- is an LLC; is
23 that correct?

24 A Yes.

1 Q And are you mentioned on -- on the LLC paperwork?

2 A Yeah.

3 Q Okay. But the LLC was create during the marriage.

4 A Yes.

5 Q Okay. And you have no objection -- and we'll get to
6 the -- to the contents and -- and assets and debts and things
7 of that nature later, but in and of itself you have no
8 objection to the LLC being awarded to Herman; is that correct?

9 A No.

10 Q Okay. And based upon our investigation, we
11 discovered that the LLC is currently in default; is that
12 correct?

13 A Yes.

14 Q Okay. And so we're just providing that information
15 to Herman to let him know, correct?

16 A Yes.

17 Q Okay. And what do you do for work?

18 A I'm a registered nurse.

19 Q Okay. And you -- where are you working currently?

20 A Advanced Health Care.

21 Q Okay. How long have you been working there?

22 A Six years.

23 Q Okay. And do you have a set schedule there?

24 A No, I control my own schedule, but generally

1 speaking Monday through Friday.

2 Q Okay. Okay. And -- and so as a result of that --
3 and what -- you -- how -- approximately how far apart are you
4 with Herman?

5 A I believe he lives about 22 to -- either between 24
6 to 26 miles away.

7 Q Okay. So it's a little bit of a trek.

8 A Yes.

9 Q Okay. And with regard to the children, what is the
10 current visitation schedule?

11 A Currently, I receive them around 4:00 p.m., anywhere
12 from between 3:30 and 4:00 p.m. on Fridays and I drop them off
13 at 7:30, 7:40 on Monday.

14 Q Okay. And is that all the children?

15 A No, Abigail has been residing with me solely.

16 Q Okay. How long has she been residing with you
17 solely?

18 A Since October of 2019.

19 Q Okay. And is it true and correct that at a previous
20 court hearing there was an order that Dad would engage in
21 reunification counseling with Abigail and I believe with Dr.
22 Gosnell?

23 A Yes.

24 Q Okay. Did -- did that ever commence?

1 A No.

2 Q Okay. I believe there was also an order from the
3 same day that indicated that Dad would have set visitation
4 with Abigail and that Abigail specifically would not be
5 entitled to teen discretion; is that correct?

6 A Correct.

7 Q Despite that, has Dad had any contact with Abigail?

8 A Only one weekend since the court order and that was
9 the initial weekend per Abigail. She actually left the next
10 day. Apparently, she went the -- I dropped her off. I
11 brought her with me because he was late in picking her up. So
12 while I was doing the transition of the children I brought her
13 with me and -- to North Las Vegas. And I believe she left
14 this Saturday. So I brought her the Friday and she left the
15 Saturday.

16 Q Okay. And to your knowledge, has Abigail attempted
17 to reach out to Herm -- to the Defendant since that period of
18 time?

19 A Not at all.

20 Q Okay. And to your knowledge, has the Defendant
21 attempted to reach out to Abigail since that period of time?

22 A Oh, no. sorry, correction. Abigail has attempted
23 to reach out to him on multiple occasions and he has not
24 responded. She has also reached out to his family, have not

1 responded.

2 Q Okay. So then to the next question. To your
3 knowledge, there has been no communication from the
4 Defendant's end towards Abigail.

5 A No.

6 Q Okay. So with regards to Abigail, would you want
7 Abigail to remain solely in your (indiscernible)?

8 A Yes.

9 Q Would you have an objection to the standing order
10 continuing to be the standing order which is Herman should
11 undergo therapeutic reunification counseling with Abigail?

12 A Yes.

13 Q Okay. Now, it's been well over a year since he's
14 had any contact with her; is that correct?

15 A Correct.

16 Q So as a result of that, the order that says that she
17 is to have some visitation with him, would you want that
18 rescinded at this point?

19 A Yes.

20 Q Okay. So you would be asking that his visitation be
21 pursuant to the therapeutic counseling with -- with Donna
22 Gosnell --

23 A Yes.

24 Q -- and then whatever the parties agreed to

1 thereafter.

2 A Yes.

3 Q Okay. Now, with regard to -- and strike that. Let
4 -- let's give the Court a little bit of background. The --
5 the six of you, you and Herman and the four children were
6 residing in a residence and it's your understanding that
7 Herman still resides in that residence; is that correct? Or
8 has he vacated that residence?

9 A He vacated that.

10 Q Okay. That was a rental, correct?

11 A Yes, it was.

12 Q There's no real property owned by --

13 A No.

14 Q -- the parties. Okay. So the marital residence
15 where you were, it was a rental, you vacated the marital
16 residence, correct?

17 A No, he vacated the marital residence.

18 Q Okay. He vacated the marital residence and how --
19 was there a conversation prior to him vacating the marital
20 residence?

21 A No, actually when I came home in March the 8th I
22 signed --

23 Q Wait, hold on. When you say March the 8th --

24 A March --

1 Q -- what year are we talking about?

2 A March the 8th, 2009 -- 2019. I came home to a
3 U-Haul in my driveway and him and his friend -- Herman and his
4 friends were emptying the house.

5 Q Okay. And was there a conversation thereafter with
6 you and Herman?

7 A No.

8 Q Okay. So Herman vacated. And where were the
9 children?

10 A He took them with him because he showed me what I
11 believe was now false paperwork, that there was an order for
12 removal from CPS which there wasn't. And so to not engage
13 him, I actually drove to CPS to get an understanding of what
14 was going on because I was totally blindsided.

15 Q Okay. And, again, this was in March of '19.

16 A March, yes.

17 Q Okay. And did you finally appear in front the court
18 regarding this matter and custody and visitation?

19 A Not until July of said year.

20 Q Okay. And so between March of '19 and July of '19,
21 did you have any contact with the children?

22 A No.

23 Q Okay. Did you attempt to have contact --

24 A Yes.

1 Q -- with the children? And how did you attempt to
2 have contact with the children?

3 A Through text with Herman.

4 Q Okay. And he would deny you to have any contact
5 or --

6 A Correct.

7 Q -- access? Okay. All right. So in July of '19 you
8 went before the Court.

9 A Yes.

10 Q And the Court ordered that you were to have some
11 limited contact with the children, I think supervised and
12 things of that nature; is that correct?

13 A It was unsupervised and I was allowed 10 -- I need
14 to correct something. I had -- he brought the children once.
15 We had lunch once. And that was in July as well just before
16 the court. But moving on, after that it wasn't supervised.
17 It was -- I was go have 10:00 a.m. to 6:00 p.m. on Saturdays.

18 Q Okay. And then eventually the non-overnight
19 visitation increased to the overnight visitation --

20 A Correct.

21 Q -- that you have now.

22 A Correct.

23 Q Okay. And if I remember correctly, the visitation
24 increased to the overnights after a court appearance wherein

1 the Judge reviewed one of the child interviews that set forth
2 the child's statements; is that correct?

3 A Correct.

4 Q Okay. And -- and so at this point that visitation
5 has been occurring for a substantive period of time, almost a
6 year, correct?

7 A Correct.

8 Q Okay. And going forward as far as the other three
9 children, what schedule -- what -- what do you believe is in
10 the best interest of the children as far as three younger
11 children going forward?

12 A I believe what's in the best interest of the
13 children is for me to have primary custody of the children.

14 Q And why do you believe that?

15 A Knowing the history -- Herman's history and his lack
16 of parenting, I've already felt that I had to be the parent
17 who will streamline the children and their progress when it
18 comes to education, when it comes to religion. I felt when it
19 comes to morals. I felt like it was -- it's the better choice
20 for me to have primary physical custody of the children.

21 Q Okay. And what would you propose as far as Herman's
22 visitation with the children?

23 A I would propose that he would have weekends, three
24 weekends (indiscernible).

1 Q All right. And Herman, as you testified to he -- he
2 works for himself, correct?

3 A Yes.

4 Q So he kind of sets his own schedule?

5 A Pretty much.

6 Q Okay. Traditionally what hours and days has he
7 worked?

8 A Traditionally speaking he would actually work every
9 day if possible because then the more money -- more days he
10 works is more money he makes.

11 Q Okay. But he does have a -- I mean, but he does --
12 he is able to set his schedule.

13 A Yes.

14 Q Okay. Now, how was your communication with Herman
15 regarding the children?

16 A None.

17 Q Okay. When you say none, what do you mean?

18 A Herman and I have not spoken I -- I would say since
19 2019, June or -- and it was because some of the communication
20 was via text and then he changed his -- he blocked me
21 originally and then he changed his number. And I have had no
22 communi -- direct communication with him since.

23 Q And when you say -- when you say direct
24 communication, is there any communication via text --

1 A None.

2 Q -- with him? Okay. Now, the Court has previously
3 ordered in this case on at least two or three occasions that
4 the two of you are to sign up for any of the parenting apps
5 that you're able to sign up for. As you recall, former Judge
6 Moss had ordered I think --

7 A AppClose.

8 Q -- App -- AppClose and then there was a conversation
9 regarding either OurFamilyWizard and/or Talking Parents.

10 A Okay.

11 Q You signed up for all of those apps; is that
12 correct?

13 A Correct.

14 Q And to date, has Herman signed up for any of those
15 apps?

16 A No.

17 Q Okay. And that is despite several requests by both
18 yourself and this office; is that correct?

19 A Correct.

20 Q Okay. Do you have any idea why he refuses to sign
21 up?

22 A I am not sure because I know for the fact that the
23 phone that he used to use is a smart phone, phones that are --
24 are generally able to run this type of platform -- or smart

1 phones in which he does has. So I'm not sure why that wasn't
2 done.

3 Q Okay. Now, with regards to -- with regards to -- to
4 Herman's relationship with the children --

5 A Uh-huh (affirmative).

6 Q -- do you agree and admit that -- that it's
7 important for Herman to maintain a relationship with the
8 children?

9 A Definitely.

10 Q Would you do anything to prevent Herman from having
11 a relationship with the children?

12 A Absolutely not.

13 Q Okay. Has Herman done anything to prevent you from
14 having a relationship with the children?

15 A Constantly.

16 Q Please elaborate.

17 A So basically I've had -- I've had numerous
18 conversations with the children about, you know, not taking
19 sides, not being involved in -- or quarrels so to speak. But
20 he would basically say you don't have to listen to them. You
21 don't have to listen to anyone. And that further just causes
22 a divide. He does -- when he tells the children he doesn't
23 have -- they don't have to listen, all they have to do is call
24 911 if they have a problem, it just -- it takes away from my

1 ability to parent because it's oh, well, if I can't get this,
2 I'm just going to call Dad. And that was the constant theme
3 throughout, just -- just this constant thing of well, if I
4 can't get what I want here, I'm just going to tell Dad and Dad
5 is going to come and get it or I'll just have Dad come and
6 pick me up because that is the behavior in which he has
7 facilitated. Also the negative conversations that he's had
8 around the children to --

9 Q Nadine, let me -- let me stop you one --

10 A Sure.

11 Q -- minute, because I am going to ask you
12 specifically about communication --

13 A Okay.

14 Q -- with the children, but the -- the very specific
15 question was the relationship and the contact with the
16 children. Now you had previously that from March of 2019 to
17 July of 2019 you I think had one --

18 A One.

19 Q -- contact with the children?

20 A One.

21 Q Okay. And Herman prevented you from having any
22 further contact with the children.

23 A Correct.

24 Q Okay. And you had indicated that --

1 MR. ROBBINS: Your Honor, I -- I've been letting
2 some of this go but it's getting into a little too much
3 leading.

4 THE COURT: Okay. Mr. Toti, just be advised --

5 THE WITNESS: I'm sorry?

6 THE COURT: -- just watch the leading. Thank you.

7 MR. TOTI: Of course, Judge.

8 THE COURT: Thank you.

9 BY MR. TOTI:

10 Q Okay. And you had indicated that Herman stated it
11 was because of a CPS investigation?

12 A Correct.

13 Q Okay. Now if you would turn to your Exhibit 1, page
14 1 of Exhibit 1. Is this a (indiscernible) that you had
15 received from Child Protective -- Child Protective Services on
16 or about December (indiscernible)?

17 A Correct.

18 Q Okay. Could you read that correspondence?

19 A It says dear Ms. Williams, the above named family or
20 child was referred to our agency for Child Protective Services
21 response and intervention. The purpose of this letter is to
22 inform you of the agency's disposition involving the above
23 named minor children. The Protective Services report was
24 closed on November 25th with a disposition of unsubstantiated.

1 Q Okay. And additionally you testified earlier that
2 -- that you work as a nurse, correct?

3 A Correct.

4 Q And it's your understanding that if -- that if you
5 had a substantiated claim you -- that might put your work in
6 jeopardy?

7 A Correct.

8 Q Okay. But you're still currently working as a
9 nurse.

10 A Correct.

11 Q Okay. So after July of '19, were there occasions
12 when Herman prevented you from having contact with the kids?

13 A Correct. He would for various reasons -- and this
14 was at the time in which the children should be there. He's
15 communicating they're not feeling well or they just didn't
16 show up. And there have been occasions where I'm like I'm a
17 nurse; if they're not feeling well, I can take care of them.
18 So that was not a good enough reason not to bring the
19 children.

20 Q Okay.

21 A Or he would state that they just don't want to come.
22 So those were the -- the reasons I was getting.

23 Q All right. And in this matter you had also filed an
24 order to show cause which was granted and to be heard today

1 during the proceeding; is that correct?

2 A Correct.

3 Q Okay. And that was as a result of additional times
4 when Herman prevented you from having the kids; is that
5 correct?

6 A Correct.

7 Q Okay. What happened on those occasions?

8 A On numerous occasions he would either again say
9 they're not feeling well, they don't want to come, or -- yeah,
10 those were the primary reasons. And he would also come and
11 pick them up from one particular Christmas break. He came and
12 picked them up early stating that I'm not supposed to have
13 them. That is not his understanding. And he called the
14 police during the process of having them picked up.

15 Q Okay. And so when we filed -- when you filed your
16 motion for an order to show cause for contempt, it was around
17 the beginning of -- of 2020; is that correct?

18 A Correct. Because --

19 Q What -- what visits were missed that caused you to
20 finally file the order to show cause?

21 A It was leading from the Christmas when he took away
22 my time with the Christmas which I was supposed to have the
23 second leg of the Christmas vacation, second segment. He also
24 did not bring them on January 4th. And I think January 11th.

1 And so there was a period in which where he just wasn't
2 bringing the children for various reasons as he states. But,
3 again, this wouldn't be communicated to me until the day of or
4 just before or the time has passed and I'm saying hey, what's
5 going on, and those are the reasons I'm getting.

6 Q Okay. Now, with regards to the level of conflict
7 that exists between you -- yourself and Herman, you've --
8 you've obviously provided the Court quite a bit of detail, but
9 how would you describe the level of conflict?

10 A I'm sorry, say it again?

11 Q The level of conflict between you and Herman?

12 A The level of conflict is very high. Herman and I
13 have been married for many years and I know how he can get.
14 Usually I'm able to offset it. But when he feels that someone
15 has wronged him, you're absolutely -- the worst person ever.
16 And he will do anything he can to hurt you.

17 Q And -- excuse me. But currently your testimony is
18 that he is refusing to communicate with you at all.

19 A Correct.

20 Q Are you willing to cooperate with him in an effort
21 to meet the best interest of the children?

22 A Correct.

23 Q Okay. You -- and you would -- okay. And with
24 regards to your relationship with all of the children, could

1 you describe that to the Court?

2 A The relationship between myself and my daughter,
3 which is Abigail, has improved drastically despite his
4 attempts for a period of six to eight months. And the chil --
5 the relationship I have with the boys are good. We have fun
6 on the weekends. Though it's -- it's difficult to co-parent
7 at this time especially when in school because everything --
8 well, I'm -- I am -- I am in contact with the teachers and
9 stuff like that, but it's -- I am on the outside. I can't get
10 any information from the parent. I have to be getting
11 information from other individuals including the children.
12 But the relationship with my sons right now are good.

13 Q Okay. Is it true and correct that neither you nor
14 Herman have any children outside of your relationship with one
15 another?

16 A No. He has a daughter.

17 Q Okay.

18 A Older daughter.

19 Q How old is she?

20 A I'm -- I'm not sure. It's 20 -- in her 20s.

21 Q So she's an adult.

22 A She's an adult.

23 Q Does she reside in Clark County, Nevada?

24 A Not to my knowledge.

1 Q Okay. And so your testimony again is is that you
2 should be granted primary physical custody and Herman should
3 have three weekends a month based upon everything that you
4 have just set forth.

5 A Correct.

6 Q Okay. Where do the children go to school currently?

7 A Currently Abigail goes to Nevada State High School.
8 And Elisha and Matthew go to Gwendolyn. And it's -- it's an
9 elementary school. And Nathaniel who -- I'm sorry, Herman
10 deferred -- which I call Nathaniel, he goes to Cram.

11 Q Okay.

12 THE COURT: I'm sorry, I missed that last one.

13 Where does Herman --

14 THE WITNESS: Cram.

15 THE COURT: -- III go? Private?

16 THE WITNESS: Cram.

17 THE COURT: I'm sorry?

18 THE WITNESS: Cram. Cram.

19 THE COURT: Pram. P-r-a-m?

20 THE WITNESS: No, C-r-a-m.

21 THE COURT: Oh, thank you. Okay. Thank you. Go
22 ahead.

23 Q Where do you propose the children go to school for
24 the 2021/2022 school year?

1 A I propose that they go to a magnet school. I do
2 have the ability to get them into Doral Academy which is a
3 really good school. The other two children who are residing
4 in my household do attend Doral Academy which makes them
5 eligible to attend Doral Academy. Due to the status of the
6 Clark County system, I think that them attending a magnet
7 school would then -- would be in their best interest --

8 Q Okay.

9 A -- also when we were residing in Connecticut they
10 were going to a magnet school.

11 Q Okay. And to your knowledge, how far is Doral
12 Academy from Herman's residence?

13 A It is not far. There are -- there are numerous
14 campuses. The one that would be closest to him would be about
15 10 to 12 miles away which would mean that it's about 15 miles
16 away thereabouts for me.

17 Q Okay. All right. Now you filed a financial
18 disclosure form in this case, correct?

19 A Correct.

20 Q And that financial disclosure form is sitting in
21 front of you, correct?

22 A Correct.

23 Q Okay. What did you set forth as your income?

24 A My income is currently -- gross income is

1 (indiscernible) -- 83 dollars and 33 cents yearly.

2 Q Okay.

3 A I'm sorry, monthly.

4 Q Monthly. Okay. And are you salaried or are you
5 hourly wage?

6 A Salaried.

7 Q Okay. And your salary is what?

8 A I'm 9 -- 9,500 --

9 Q Okay.

10 A -- (indiscernible).

11 Q But it -- it breaks down to that.

12 A Yes.

13 Q So basically a little bit over a hundred thousand
14 dollars a year.

15 A Correct.

16 Q Okay. All right. And Herman filed an updated
17 pretrial memorandum in advance of this case; is that correct?

18 A Correct.

19 Q Okay. Now, if you look all the way at the bottom
20 right of his financial disclosure form, what amount does he
21 set forth as his gross monthly income?

22 A 11,300.

23 Q Okay. He sets forth 11,300. Now, up above under
24 the gross monthly income table and about the middle of this --

1 of the -- of the filing -- or of the document, what amount
2 does he have there?

3 A \$5,666.66.

4 Q Okay. So a discrepancy of almost half, fair to say?

5 A Correct.

6 Q Okay. Traditionally to your knowledge while
7 residing with Herman, how much money would Herman generally
8 earn in this business?

9 A It varies. It could be anywhere from six to \$10,000
10 a month.

11 Q Okay. And you assisted Herman in running this
12 business; is that correct?

13 A Correct.

14 Q What were your duties of the business?

15 A Okay. So there were -- just to be clear, there were
16 numerous businesses. But this particular one in question, I
17 did not engage in any activities in the business only because
18 of the debt that was incurred and in default in the business
19 in New York. So I chose not to be responsible in any way for
20 this particular one.

21 Q I see.

22 A Yes.

23 Q But you would -- you still had firsthand knowledge
24 of --

1 A Correct.

2 Q -- of income and things of that nature.

3 A Correct.

4 Q And, again, you're testifying that the income on a
5 monthly basis would be how much?

6 A Anywhere from six to \$10,000.

7 Q Okay. And what are the expenses of the business, if
8 you know?

9 A Other than insurance and gas, I don't foresee there
10 are any other because there is no physical space. And that's
11 -- that's the only expense that I know about.

12 Q So as a result of your understanding of Herman's
13 business and how he runs it, when you're looking at his
14 financial disclosure form, which number do you think is
15 correct with regards to his gross monthly income?

16 A The \$11,000.

17 Q Okay. And you would want the Court to consider that
18 as his gross monthly income with --

19 A Yes.

20 Q -- making any calculations in this matter?

21 A Yes.

22 Q With regard to the division of assets and debts in
23 this matter, is it true and accurate that the two of you are
24 separated -- you've been separated since you testified back in

1 2019?

2 A Right.

3 Q As a result of that, are there any assets or
4 household furnishings or things of that nature in Herman's
5 possession that you're seeking returned to you?

6 A Just my tools and -- my portion of the tools and my
7 rings that he took.

8 Q Okay. So let's start with the tools. What -- what
9 tools did you and Herman accumulate during the marriage?

10 A I would say 75 percent of tool that -- tools that he
11 has -- and as a matter of fact, let me correct that; 90
12 percent of the tools that he has in his possession right now
13 were acquired between the both of us.

14 Q And what tools are they?

15 A General wrenches, a lot of el -- electrical drills,
16 saws, pneumatic tools, compressors, various screwdrivers.
17 Because we had a body shop which I had paid for the tools.

18 Q Okay. So you're asking for a -- a -- an equitable
19 division of all the tools.

20 A Correct.

21 Q Okay. Now, with regard to the rings, what rings are
22 you talking about?

23 A He took -- it was a three set white diamond 18 karat
24 gold diamond rings that he took three -- two of the three

1 pieces because it was actually a set.

2 Q Okay. And what was the value of that ring set to
3 your knowledge?

4 A It's 3500.

5 Q Okay. And he took two of them?

6 A Two of them.

7 Q And you still have the one.

8 A Yes, because I actually had one in my possession,
9 so --

10 Q Okay. And then before we talk further about the
11 rings, let me back up. And the tools, what would you estimate
12 the amount of money you spend on the tools over the years?

13 A About 15,000.

14 Q Meaning 1-5?

15 A 1-5.

16 Q Okay. Let me turn your attention to -- to Exhibit
17 6.

18 THE COURT: And this one was not stipulated to.

19 MR. TOTI: Correct, Judge.

20 THE COURT: Okay. Thank you.

21 Q What is this document?

22 A That is a document that I went to the police station
23 and I made a report that there were some missing rings. A
24 case was opened and then they later stated that he with his ID

1 and everything pawned those two particular items.

2 Q Okay. And so that in essence confirmed your belief
3 and understanding that he removed the rings from your
4 possession.

5 A Correct.

6 Q Okay. Beyond the rings and beyond the tools, are
7 there any other tangible items in Herman's possession that you
8 want returned to you?

9 A No, other than my 2015 Silverado.

10 Q Okay. Well -- okay, we'll get to vehicles in a
11 minute.

12 A Okay.

13 Q But household furnishings --

14 A No.

15 Q -- though. Okay. To your knowledge -- well, strike
16 that. When Herman vacated the residence back in 2019, he took
17 you said everything.

18 A He took 90 percent of the furniture. He took the
19 kids' furniture. He took --

20 Q Okay.

21 A Yeah, he took --

22 Q Is it fair to say that he took basically everything
23 that he wanted?

24 A Correct.

1 Q Okay. Is it your belief that there is nothing
2 remaining in your possession that he wanted returned to him?

3 A Correct.

4 Q Okay. All right. Did you and Herman -- did you and
5 Herman share finances as far as bank accounts and things of
6 that nature?

7 A No.

8 Q Are there currently any joint accounts?

9 A No.

10 Q Okay. What are you asking the Court to do with all
11 of the existing financial accounts?

12 A That everyone keeps their own.

13 Q Okay. And is it true and correct that there are no
14 retirement accounts held by either?

15 A Correct.

16 Q Okay. And it's true and correct that there are no
17 stock accounts or anything like that to your knowledge.

18 A No.

19 Q So just the general bank accounts Herman would keep
20 the ones in his possession, you would keep the ones in your
21 possession.

22 A Correct.

23 Q Okay. With regard to vehicles, what vehicles do you
24 have?

1 A The vehicle that I am requesting is a 2015 Chevy
2 Silverado. I am unaware of the number of vehicles he has in
3 his property but in my estimation it would be at least three.

4 Q Three in addition to the Silverado?

5 A Three in addition to the Silverado.

6 Q Okay. And so the -- now the -- the Silverado, the
7 2015 Silverado, is currently in Herman's possession in
8 addition to the other three vehicles that you believe he has.

9 A Correct.

10 Q So all of the vehicles of community are -- are
11 currently in Herman's possession.

12 A Correct.

13 Q Okay. Now, I believe the Court previously granted
14 for lack of a better term exclusive possession of the 2015
15 Silverado to Herman because he indicated that he used it for
16 work, is --

17 A Correct.

18 Q -- that correct? If the 2015 Silverado is provided
19 to you, will Herman still be able to work?

20 A Correct.

21 Q How so?

22 A Because the other vehicles does have the tow
23 attachment.

24 Q Okay. Which vehicle is that?

1 A There are other Silverados because that's what's
2 primarily used for towing. So I know that at least two of the
3 other vehicles are 2500 HD Silverados which can be used for
4 towing as well.

5 Q Okay. So -- and did you assist in purchasing the --
6 the tow kits?

7 A Yes.

8 Q Okay. So that's how you know that the other tow
9 kits are -- are there.

10 A Well, the other ones came from -- from other
11 vehicles. Yes. Yes.

12 Q Okay. All right. Now, with regard to the
13 Silverado, the 2015 Silverado --

14 A Correct.

15 Q -- that's the vehicle you want returned to you.

16 A Correct.

17 Q Is it true and correct that -- well, is it true and
18 correct that the Court ordered you to pay the registration on
19 that vehicle?

20 A Correct.

21 Q And you did so.

22 A I did.

23 Q Okay. And that order -- that order of the Court
24 that requested that you do that -- was the -- I believe a

1 court hearing in December of 2019; is that correct?

2 A Correct.

3 Q And it is --

4 MR. TOTI: Your Honor, for the Court's edification,
5 that is the court order that was filed with the Court on
6 January 30th, 2020 memorializing the December 16, 2019
7 hearing.

8 THE COURT: Thank you.

9 Q Now the order of that court indicates on page 2 at
10 the bottom that due to Plaintiff cancelling the registration
11 on the truck Plaintiff shall pay 100 percent of the
12 registration and Defendant shall use the tow tu -- tow truck
13 pending trial. The Defendant shall pay all her expenses
14 related to the vehicle. Is that correct?

15 A Correct.

16 Q Okay. And, again, you testified that you did pay
17 for the registration.

18 A Correct.

19 Q Okay. And were there other expenses associated with
20 the Silverado?

21 A Yes, there was the monthly insurance as well as the
22 lease note.

23 Q Okay.

24 A The truck note. I'm sorry.

1 Q Okay. And obviously pursuant to that order after
2 December of 2019 those should have been Herman's
3 responsibility.

4 A Correct.

5 Q Okay. Did he provide you any monies for those?

6 A No, he did not.

7 Q Okay. Do you have proof and verification of those
8 expenses?

9 A Correct. I do.

10 Q Okay. If I were to turn your assistant -- or
11 attention to page -- or to Exhibit 2.

12 A Okay.

13 Q Can you tell me what Exhibit 2 is?

14 A Exhibit 2 is the insurance for the vehicles that I
15 -- for the vehicle I was paying for.

16 Q Okay. So page (indiscernible) is for what?

17 A Page 1 and 2 is for actually the upcoming period.
18 And the page 2 is for March 13, 2020 to September 13, 2020.

19 Q So let's -- hang on. Let's be -- make sure -- I
20 think you misstated --

21 THE COURT: Hold on. I have them on -- I have them
22 on the screen --

23 Q Statement --

24 THE COURT: -- Mr. Toti. So if you can let me know

1 if I'm on the right page for everyone.

2 MR. TOTI: Oh, sure. Page 1 and 2, Judge, they're
3 -- they're all two page statements.

4 THE COURT: Okay.

5 MR. TOTI: So I think --

6 THE COURT: Here's March.

7 MR. TOTI: -- my client --

8 THE COURT: Here's the --

9 MR. TOTI: -- started talking about --

10 THE COURT: -- March one she's talking about.

11 MR. TOTI: -- a statement to (indiscernible) -- I
12 understand.

13 THE COURT: Yeah.

14 Q So statement 1 which is on page 1 and 2 is for a
15 period of time that has yet to commence.

16 A Right.

17 Q Okay. So page 3, this is for the pay period of
18 what?

19 A March 13, 2020 to December 13, 2020.

20 Q Okay. And this is -- this is allocation a period of
21 time wherein Herman should have been paying --

22 A Correct.

23 Q -- the expenses.

24 A Correct.

1 Q Okay. And how much did you pay for the 2015
2 Silverado?

3 A \$1,104.

4 Q And that is provided down at the bottom of the page?

5 A Correct.

6 Q Okay. And then if we were to turn to page 5, what
7 statement is this?

8 A See, this is actually for March 13, 2020 to
9 September 2020.

10 Q Is it the same one?

11 A It is the same one. It's --

12 Q Okay.

13 A -- (indiscernible).

14 Q Okay. So let's skip onto page 7.

15 A Okay. 7 is periods March -- I'm sorry, September
16 13, 2019 to March 13, 2020.

17 Q Okay. So a portion of this bill is prior to it
18 being Herman's responsibility, correct?

19 A Correct.

20 Q Rough -- fair to say roughly half?

21 A Half.

22 Q Okay. And how much did you pay?

23 A \$891.

24 Q And that's down at the bottom of the -- of page 7;

1 is that correct?

2 A Correct.

3 Q Okay. So the statements that we have here show the
4 Court that the coverage period of time, September 13, 2019
5 through March of 13, 2020 and then March of 13, 2020 through
6 September 13, 2020, was paid for and paid for solely by you.

7 A Correct.

8 Q You do not have the statement for the September 13,
9 2020 payment; is that correct?

10 A No, I --

11 Q Okay.

12 A They gave me two things twice --

13 Q Okay.

14 A -- and I requested it.

15 Q All right. But the -- the Silverado had insurance
16 at the time.

17 A Continuous.

18 Q And you paid for it.

19 A Continuous.

20 Q And you would ask that you be reimbursed for that;
21 is that correct?

22 A Under -- yes.

23 Q Okay. Oh, and you know what? I take it back.

24 Let's look at Exhibit -- or page -- or Exhibit 2, page 7. I

1 think you pointed out the wrong vehicle. If you look at the
2 bottom of page 7 --

3 A You are correct. It is actually 1,000 --

4 Q Okay. Hang on. Hang on. At the bottom of page 7
5 you previously identified that you paid the sum of 891 for the
6 2015 Chevy Silverado, correct?

7 A Correct.

8 Q That is not a correct statement though.

9 A Correct.

10 Q Okay. What page should we be looking at?

11 A Page 8 which would show \$1,009.

12 Q Okay. So you paid \$1,009 for the 2015 Chevy
13 Silverado for that period of time in question.

14 A Yes.

15 Q Okay. All right. And you were asking for
16 reimbursement.

17 A Correct.

18 Q Okay. And then if we look at Exhibit 3.

19 A Yes.

20 Q Can you tell me what Exhibit 3 is?

21 A All right. So these are the Chase, the loan auto
22 statements that I -- they were on auto debit from my bank
23 account. Page 1 shows the September -- I'm sorry, December
24 payment. Page 3 will show -- because there are two pay

1 statements. Page 3 will show the statement of 3/10. Page 5
2 will show the statement for 2/10. And page 7 will show the
3 statement for 1/10.

4 Q Okay. And do these statements -- and are there any
5 statements after December -- the December 10, 2020 payment?

6 A No, because after all of these -- the -- this -- the
7 last payment was in March was in March where the loan then
8 commenced. So this statement ran from December until March --
9 December 19th to March 2020.

10 Q Okay. So what you're saying is is that the vehicle
11 was paid off after this?

12 A Correct.

13 Q And these represent all of the payments that you
14 made after Herman was supposed to make the payments --

15 A Correct.

16 Q -- for you. And you are requesting that you be
17 reimbursed these amounts?

18 A Correct.

19 Q Okay. Are there any other assets that we haven't
20 talked about that you would like to apprise the Court of?

21 A No.

22 Q Okay. With regards to debts, did you and Herman
23 accumulate debt during the marriage?

24 A Yes.

1 Q Okay. How much debt?

2 A Quite a bit.

3 Q Okay.

4 A Quite a bit.

5 Q Okay. Did you -- is there still debt that you and
6 Herman acquired during the marriage that is outstanding?

7 A Yes.

8 Q What debts are there?

9 A This is a tax serve capital debt which is the debt
10 for the City of Bridgeport for the taxes for the car.

11 Q Okay. Let me stop you because nobody knows what
12 you're talking about.

13 A Oh.

14 Q Okay.

15 A I'm sorry.

16 Q It's okay. So you are -- if I can turn your
17 attention to Exhibit 4. Can you tell the Court what Exhibit 4
18 is?

19 A Okay. So Exhibit 4, page 1 is the copy of the
20 statement for tax serve which is the debt for the cars back in
21 Bridgeport, Connecticut where we reside. Now, the statement
22 does say January 30th, but they only send out the statement
23 once per year because during the year they calculate the taxes
24 and then they calculate the interest and then they'll send you

1 a bill.

2 Q Okay. So this is -- you're looking at page 1?

3 A Page 1.

4 Q And this is dated January 31, 2020?

5 A Correct.

6 Q Okay. And this shows -- how many vehicles does this
7 document show?

8 A It actually shows three vehicles with five bills.

9 Q Okay. And these are state taxes on the vehicles?

10 A Correct.

11 Q Okay. And this is an annual thing.

12 A Correct.

13 Q Okay. And so this bill here which was sent out on
14 January 31st, 2020, was this satisfied?

15 A I paid most of it. And the only ones remaining are
16 the -- is for the Silverado and I believe (indiscernible)
17 Tahoe.

18 Q Okay. If you can turn to page 2. Does -- what --
19 what does page 2 reflect?

20 A Okay. So page 2 reflects the current outstanding.
21 The first -- first row shows that I have paid 400 -- I'm
22 sorry, \$350. So there is a 450 balance remaining which I
23 intend to take care of at the end of the month. And -- and
24 then the remaining two is what I'm asking for him to be

1 responsible for.

2 Q Okay. What do -- what do the remaining two show?

3 A The remaining two shows a balance of \$891 for one
4 and the other one is \$2,743.

5 Q Okay. And what are -- how are you asking the Court
6 to divide these -- this remaining outstanding debt?

7 A Well, I'm asking though seeing that I have taken
8 care of most of the debt as the original debt was over \$8,000.
9 I'm willing to pay the \$423 balance remaining on the first
10 one. And I'm asking him to be responsible for the remaining
11 two.

12 Q Okay. And in addition to these debts, are there any
13 other debts that were accumulated during the marriage that are
14 still outstanding?

15 A Yes. There is the debt consolidation and I
16 consolidated all the debt that we had acquired together. And
17 I have them in one large payment of -- the original loan was
18 \$34,560.75. And I've been paying on this solely. Each
19 paycheck they remove \$469.21 twice per month.

20 Q Okay. So let's turn to Exhibit 5. And on Exhibit
21 5, page 1, can you tell me the statement date of that -- of
22 that exhibit?

23 A The statement date is 1/22/2021.

24 Q Okay. And is this the consolidation statement that

1 you are speaking of?

2 A Yes.

3 Q Okay. So all of your and Herman's joint debts were
4 consolidated and this is the -- and this is the payment.

5 A Yes.

6 Q Okay. And what is the current outstanding balance?

7 A The current outstanding balance is \$21,617.21.

8 Q Okay. And could you turn to page 2 of Exhibit 5?

9 A Yes.

10 Q Okay. And what -- can you tell us the date of this
11 statement?

12 A The date of this statement is 12/26/2017.

13 Q Okay. And you and Herman and the children were all
14 residing together at this time.

15 A Yes.

16 Q And Herman -- did Herman know that you had
17 consolidated all the bills?

18 A Yes.

19 Q And did he -- did you have his permission and
20 consent?

21 A Yes.

22 Q Okay. And what is the -- what is the balance on
23 this statement?

24 A Thirty-four. The initiation is \$34,560.75.

1 Q So this is the initial --

2 A Yes.

3 Q -- bill.

4 A Yes.

5 Q Okay. And, again, you've -- the current bill is
6 closer to 21,000 now.

7 A Yes.

8 Q And so you indicated that they have been taking
9 money out of your paycheck each month; is that correct?

10 A Correct.

11 Q Okay. To your knowledge, has Herman paid any monies
12 towards this debt consolidation?

13 A No.

14 Q Okay. What are you asking the Court to do regarding
15 this debt consolidation loan?

16 A I'm asking him to be responsible for 50 percent
17 remaining.

18 Q Okay. So of the \$21,000, you want Herman to pay his
19 share.

20 A Correct.

21 Q Okay. Are there any other joint debts that the two
22 of you (indiscernible)?

23 A No.

24 Q Okay. With regards to any and all other debts in

1 your name, are you willing to take on all of those debts?

2 A Yes.

3 Q Okay. And you would want Herman to be responsible
4 for all the debts on his own?

5 A Correct.

6 Q Okay. Could you turn to Herman's financial
7 disclosure form on page 7 -- 6?

8 A Yes.

9 Q Okay. What is the title of this page?

10 A Personal added -- assets and debt chart.

11 Q Okay. Does he list any assets?

12 A No.

13 Q Does he list any debts?

14 A No, he does not.

15 Q Now, you've testified as to some assets that the two
16 of you own primarily the vehicles; is that correct?

17 A Correct.

18 Q Okay. You have any idea why Herman decided not to
19 list those?

20 A No, I don't.

21 Q Okay. Now, the debts that we just talked about, to
22 your knowledge based on your previous statement, Herman had
23 understanding of those debts as well.

24 A Okay. Because one of the ones were primarily to

1 float his business.

2 Q Okay. Is -- do you have any understanding or idea
3 why Herman wouldn't have listed those debts?

4 A No.

5 Q Okay. At -- at some point there was a -- it was
6 pled perhaps that Herman may be entitled to alimony. Do you
7 recall seeing that statement?

8 A Yes.

9 Q Okay. What is your position on the issue of
10 alimony?

11 A I don't feel that he deserves alimony. I make
12 enough money to take care of my family and to not be
13 responsible for Herman. Herman has the capacity to work and
14 he has worked in the past. So I don't think he's entitled to
15 alimony.

16 Q Okay. And, again, you've testified earlier that
17 your gross monthly income is around 9500; is that correct?

18 A Correct.

19 Q And you estimated Herman's income as anywhere
20 between 6,000 and 11,000 a month; is that correct?

21 A Correct.

22 Q Okay. Now you also testified earlier regarding
23 Herman withholding the kids from you in November and December
24 and even into January of 2019 and 2020; is that correct?

1 A Correct.

2 Q And that was the basis for your order to show cause
3 that you -- and motion for contempt that you filed previously.

4 A Correct.

5 Q And you indicated that you are asking that Herman be
6 held in contempt for those violations of not abiding by the
7 court order; is that correct?

8 A Correct.

9 Q Okay. Additionally, you have incurred attorney's
10 fees in this matter; is that correct?

11 A I have.

12 Q How much in attorney's fees have you incurred?

13 A 3,000 so far.

14 Q Okay. And are you requesting that Herman reimburse
15 you attorney's fees?

16 A I do.

17 Q Okay.

18 A I do.

19 Q All right. And is that because of the acts of
20 contempt that we just set forth?

21 A Yes.

22 Q Okay. All right.

23 A And lack of communication. He just -- I -- I have
24 no way of contacting him or speaking to him about the

1 children. So I was forced to get an attorney.

2 Q Okay. All right. So -- so the act of him not
3 abiding by the Court with regard to signing up with the
4 parenting app is another --

5 A Yes.

6 Q -- app that you're saying for. Fair enough. Okay.
7 Is there anything else you want the Judge to know prior to
8 making a decision in this matter.

9 A It has been -- everything that he has done to, you
10 know, with the false CPS claims, you know, it's just -- it's
11 unspeakable. I asked him for a divorce and he knew why I
12 asked him. It just wasn't working anymore. And instead of us
13 parting ways amicably which I was trying to do; I even offered
14 to help him to find somewhere to live, even after I asked him
15 for a divorce I still gave him monies to pay for his
16 restitution because I was trying to keep it amicable not
17 knowing that behind my back he was just cutting me down and --
18 and tearing down my relationship with the children. It is
19 just unspeakable.

20 If it's just not working, it's just not working, but
21 to do what he's done is just irres -- irrep -- reprehensible
22 and also using the courts to punish me by lying and trying to
23 have financial gain is just wrong. He knew I worked --

24 MR. ROBBINS: Your Honor, there's no question

1 pending.

2 A -- hours.

3 THE COURT: Okay. And at this point I am going to
4 sustain the object. Go ahead. Next question, Mr. Toti.

5 MR. TOTI: I -- I think that's all I have, Judge, at
6 this time.

7 THE COURT: Thank you. Cross examination?

8 MR. ROBBINS: Okay.

9 CROSS EXAMINATION

10 BY MR. ROBBINS:

11 Q Nadine, you stated that there are no substantiated
12 CPS cases against you; is that correct?

13 A Correct.

14 Q Have you ever asked CPS to review all of the
15 records?

16 A If I've asked CPS to review -- no, I've never asked
17 them to review any record.

18 Q Okay. Have you ever seen any CPS records?

19 A Only what was filed in court.

20 Q Okay. So that's a yes, you have seen CPS records?

21 A Only -- yes, only what was filed in court.

22 Q Okay. So you're familiar then with the CPS record
23 that stated that there was a substantiated CPS claim in
24 February of 2019 then, right?

1 A However, it was incorrect because after they did a
2 thorough investigation they realized that the children were
3 put up to it and they unsubstantiated the reports.

4 Q Is that true?

5 A That is true.

6 Q There was -- there's been multiple CPS reports,
7 correct?

8 A Again, only what was filed and I've seen in court.
9 If there are others, I am not sure.

10 Q Okay. You -- you pointed towards a letter from
11 December 10th, 2019 to say that there was an unsubstantiated
12 report, right?

13 A Yes.

14 Q Okay. And do you know which report that was
15 referring to?

16 A I only know about the one that said that he filed
17 originally.

18 Q Okay. Do you know why CPS substantiated that
19 report?

20 A Excuse me?

21 Q Do you know why CPS substantiated that report from
22 February 2019?

23 A Could you -- I'm sorry, your voice is obscured so
24 I'm asking you to repeat because the -- the -- it's -- it's

1 obscured. So I -- I want to make sure I'm answering your
2 questions clearly.

3 Q Do you know why CPS substantiated their -- the
4 report in February of 2019?

5 MR. TOTI: And Your Honor, I'm going to object
6 because it's assumes facts not in evidence. There is nothing
7 before the Court --

8 MR. ROBBINS: The C --

9 MR. TOTI: -- that suggest that --

10 MR. ROBBINS: I'm sorry. The CPS reports already
11 been admitted. It's -- that would be exhibit GG.

12 THE COURT: To -- to what? Is that your exhibit,
13 Counsel?

14 MR. ROBBINS: Yes, it's Exhibit GG that is now
15 admitted.

16 THE COURT: I only have Bate 1 -- 101, 200, and 300
17 for your exhibits that were submitted.

18 MR. ROBBINS: So GG is from 144 to 175?

19 THE COURT: So hold on. I have to find the proper
20 page. So it's page 1 -- 1 -- I'm sorry, 1 -- 140 --

21 MR. ROBBINS: 144.

22 THE COURT: Okay.

23 MR. ROBBINS: And this is a complete CPS report.

24 THE COURT: Oh, hold on. Let me just get to it so

1 everyone can see it here.

2 MR. ROBBINS: And Your Honor, just on a side note, I
3 know this case is sealed already, but these are CPS reports
4 that maybe should not be into the record. So if the Court
5 is --

6 THE COURT: They'll be sealed as well. So anything
7 that is associated with this case will be under seal.

8 MR. ROBBINS: I --

9 (COURT RECESSED AT 10:14 AND RESUMED AT 10:14)

10 THE COURT: Thank you. And I'm assuming that both
11 Counsels understand that they both signed confidentiality
12 agreements as well and they know that they will not
13 disseminate this information?

14 MR. ROBBINS: Yes.

15 THE COURT: All right. So here -- okay, I found --
16 is this the one you're talking about, Counsel?

17 MR. ROBBINS: Yes.

18 THE COURT: Okay. Go ahead.

19 BY MR. ROBBINS:

20 Q Okay. So my question is do you know why CPS
21 substantiated the report?

22 MR. TOTI: And Your Honor, I'm still going to
23 object. He -- the exhibit doesn't set forth that anything was
24 substantiated. I'm not -- I'm not sure what he's referring to

1 at this point.

2 THE COURT: All right. Counsel.

3 MR. TOTI: I see UNITY notes, but --

4 THE COURT: Offer of proof?

5 MR. ROBBINS: Sure.

6 THE COURT: And it's my understanding Mr. Toti you
7 did not object to any of his exhibits, correct?

8 MR. TOTI: I don't have an objection to the exhibits
9 Judge but I --

10 THE COURT: Okay.

11 MR. TOTI: -- I don't know -- I object to what he's
12 stating the -- the exhibits through.

13 THE COURT: Okay.

14 MR. ROBBINS: The -- it's four -- I think he's
15 objecting to foundation which is fine. So I'll lay some
16 foundation.

17 THE COURT: Well, actually just point to the exhibit
18 Mr. Robbins and --

19 MR. ROBBINS: Sure.

20 THE COURT: -- that's fine.

21 BY MR. ROBBINS:

22 Q Can you turn to page 153, please?

23 THE COURT: Okay. Hold on. Let me get there. Is
24 this the page, Counsel?

1 MR. ROBBINS: Yes.

2 THE COURT: Okay. Go ahead.

3 Q All right. Nadine, can you read the paragraph that
4 starts with disposition, response time?

5 A Disposition and response time explain pe -- as a
6 pending danger is identified. The NM is violent and therefore
7 is no protective adult in home. NM has substantiated prior
8 case from February 19 in which she hit child Abigail in the
9 head with PVC pipe causing injury and a scar. NM engages in
10 ongoing domestic violence in home. NM possibly discharged a
11 firearm with children present. The previous case was closed
12 and the understanding that (indiscernible) will be protected
13 and keep the children in his care. It is now reported the
14 children are in NM's care.

15 Q Okay. So do you now disagree that there was a
16 February 2019 substantiated report?

17 A Yes, I am disagreeing that there is a February 19th
18 different -- substantiated report.

19 Q Despite it clearly stating that there was one.

20 MR. TOTI: Your Honor, asked and answered. And --
21 and Your Honor --

22 THE COURT: Sustained.

23 MR. TOTI: -- with all due respect. Thank you.

24 MR. ROBBINS: Okay.

1 BY MR. ROBBINS:

2 Q Okay. So do you -- again, I'm asking you do you
3 know why they substantiated the report in February 2019?
4 Whether --

5 A I guess --

6 Q -- it was later turned over or not, you don't? So
7 even after --

8 A Yeah.

9 Q -- reading that which stated that you hit your
10 daughter Abigail in the head with a PVC pipe, you're still
11 stating you don't know why.

12 MR. TOTI: Your Honor, asked and answered.

13 THE COURT: Sustained.

14 BY MR. ROBBINS:

15 Q Okay. Did you ever hit Abigail on the head with a
16 PVC pipe?

17 A Never.

18 Q Where did this information come from?

19 A That was a false report by Herman.

20 Q Okay. Abigail has never reported that you hit her
21 on the head with a PVC pipe?

22 A (Indiscernible) false report and actually coached by
23 Herman.

24 Q How do you know that?

1 A Well, for the mere fact that Abigail is now solely
2 residing with me, it says a lot.

3 Q So you're just -- you're just guessing that he
4 coached her to --

5 A Oh, I'm not.

6 Q Okay. She's made that report multiple times, hasn't
7 she?

8 A Abigail has reported to me that she was told what
9 to --

10 MR. ROBBINS: Objection.

11 A -- say by her --

12 MR. ROBBINS: Objection, hearsay.

13 MR. TOTI: And Your Honor, he asked the question.
14 She's got to be allowed to answer it. He said do you know.
15 She's telling him.

16 THE COURT: And you opened the door. So overruled.
17 Go ahead.

18 THE WITNESS: Okay. So she was told by her father
19 Herman Williams and her grandmother in New York, Jean Williams
20 (ph) as well as Holly Williams (ph) which is her aunt what to
21 say.

22 BY MR. ROBBINS:

23 Q Okay. Does she have a scar on her head?

24 A Yes, she does.

1 Q How did she get that scar?

2 A She got that scar from a bracelet I had. I have an
3 allergy bracelet that I would wear and she got that scar from
4 that bracelet.

5 Q And did you hit her on the head while you were
6 wearing that bracelet?

7 A I did not.

8 Q So how did she get --

9 A I did not hit her in --

10 Q -- this scar?

11 A The -- the bracelet caused the scar.

12 Q How? If you're wearing a bracelet, I don't -- I
13 don't have any scars on my head. So how did a -- how did a
14 bracelet --

15 A Excuse me.

16 Q How did a bracelet cause a scar --

17 A The bracelet --

18 Q -- on her head?

19 A -- has -- the bracelet has charms on it.

20 Q Okay. So again how did --

21 A The bracelet had --

22 Q How did the bracelet then cause a scar to her head?

23 A Okay. During one particular period when I was
24 engaging physical discipline the -- the bracelet caused a scar

1 to her head.

2 Q So you hit her on the head.

3 A I did not hit her on the head. That is not what I
4 said.

5 Q During a physical altercation that you had with your
6 daughter the bracelet caused the scar to her head.

7 A I did not say physical -- Mr. Robbins, that's not
8 what I said.

9 Q CPS -- in -- in -- from February to -- until the
10 time that you had a court order CPS was actually the ones that
11 placed the children into Dad's care, correct?

12 A And that was because of false reporting. Yes.

13 Q Okay. And I'm not -- it's a -- that was a yes or no
14 answer. All right. They placed the child -- children into
15 Herman's care, right?

16 A My answer remains the same, Mr. Robbins.

17 Q Okay. Okay. Now I want to ask you once you began
18 to have visitation, what was the initial schedule that you
19 were following, court ordered?

20 A Saturday from 10:00 a.m. to 6:00 p.m.

21 Q Okay. And when was that schedule changed?

22 A At a subsequent court hearing.

23 Q Do you know the month?

24 A No, I don't recall.

1 Q The December --

2 A It was a court --

3 Q -- 2020 --

4 A It was -- no, because we've had many court hearings.
5 So it was changed in one of them because it went from --

6 Q I'm -- I'm sorry, was it December 2019?

7 A No, it was before that because I was -- I was
8 getting -- it had moved to weekends, full weekends. So it
9 went from one day to full weekends then it went from -- yeah,
10 from one day to full weekends.

11 Q Okay. When did it go -- do you -- you don't
12 remember when it went to full weekends?

13 A That is what I just said.

14 Q Okay. Sometime after the end of October of 2019
15 though, right?

16 A Correct.

17 Q Okay. Now in October -- and at that initial hearing
18 when you were given daytime visitation, the Judge stated that
19 you were not to have any overnight visitation, correct?

20 A I'm sorry, one more time?

21 Q You were not to have overnight visitation.

22 A No, start -- start the entire sentence. I just need
23 to hear the -- the entire piece --

24 Q When you were to have --

1 A -- the entire question.

2 Q -- the daytime -- when -- when you were to have the
3 daytime visitation, the Judge also --

4 A Okay.

5 Q I'll -- I'll rephrase it. The Judge also gave you
6 holiday visitation; however, you were to have no overnight
7 visitation, correct?

8 A Incorrect. Incorrect.

9 Q Okay. Is that --

10 A Incorrect.

11 MR. ROBBINS: I'm -- I'm going to ask the Court to
12 take judicial notice as to the order which was that Mom was to
13 have holiday visitation with no overnights.

14 THE COURT: And you're claiming this is an order
15 filed on what day?

16 MR. ROBBINS: Give me one second. I can --

17 THE COURT: The order filed on January 30th, 2020.

18 MR. ROBBINS: I believe so.

19 THE COURT: Let me look. Hold on, I'm pulling it up
20 right now. Counsel, I'm sharing screen. Is this the one
21 you're talking about?

22 MR. ROBBINS: I believe so, Your Honor.

23 THE COURT: All right.

24 MR. TOTI: And Judge, as far as -- as far as taking

1 judicial notice, I would ask you to take judicial notice of
2 the time of the order. I believe that it is very important.
3 I believe that -- and just an order to clarify. And -- and
4 Your Honor of course will be able to review all of the orders,
5 but --

6 THE COURT: Okay.

7 MR. TOTI: -- I -- the -- the issue of course,
8 Judge, was whether or not the standard holiday schedule that
9 Judge Moss put in place in this matter should be adhered to or
10 not. The -- the holiday schedule that Judge Moss put in place
11 included overnight visitation. There was never an order per
12 my understanding prior to this order that you're looking at
13 now Judge that specifically said my client was not allowed
14 overnight contact during holidays.

15 THE COURT: I'm sorry, I'm just looking here. And
16 please tell me where in this order it --

17 MR. ROBBINS: It --

18 THE COURT: -- states --

19 MR. ROBBINS: They may not --

20 THE COURT: -- (indiscernible).

21 MR. ROBBINS: Yeah.

22 THE COURT: It's not here.

23 MR. ROBBINS: It -- it may not be in the order, Your
24 Honor. I would ask that when you do go back to -- to review

1 the -- the videos. This was before I was part of the case.

2 THE COURT: But the count -- I'm just going to tell
3 you right now I'm not going to go looking at videos that
4 aren't even memorialized in a written order because I can't
5 take judicial notice of something that's not even in an order.
6 If it didn't make it into the order, I think it's -- it's not
7 appropriate --

8 MR. ROBBINS: Okay. I'll move on.

9 THE COURT: -- at this point.

10 MR. ROBBINS: I'll move on.

11 THE COURT: Thank you.

12 MR. ROBBINS: Okay.

13 THE COURT: But -- however, the Court does have
14 ability to take -- I -- I don't have to take judicial notice
15 of a court order that's in writing. It's right there.
16 Everyone has it. So okay. Go ahead.

17 BY MR. ROBBINS:

18 Q Now, there was an -- there was a dispute as to your
19 visitation when it came to Nevada Day 2019, correct?

20 A Correct.

21 Q And what was that dispute?

22 A The dispute, again, I was following the default --
23 default order given by Judge Moss that I would have the
24 children on that time.

1 Q Okay.

2 A So I was following the orders that was given by
3 Judge Moss.

4 Q Okay. And did you have visitation with Abigail
5 prior to the Nevada Day 2019?

6 A Did I have what, I'm sorry?

7 Q Visitation.

8 A Yes, I did.

9 Q What type of visitation did you have with Abigail?

10 A We had the Saturdays and then we (indiscernible) --

11 THE COURT: I'm sorry, and I -- I didn't hear the
12 response, Mr. Toti, of your client.

13 THE WITNESS: I had visitation with Abigail
14 originally when the first court appearance. It started
15 Saturdays. The second court appearance I was given weekends
16 and holidays. I had contact with Abigail during
17 (indiscernible), physical contact during the weekends.

18 Q After that Nevada Day visitation, that's when
19 Abigail stopped having visitations with Herman, correct?

20 A Correct.

21 Q Okay. And that Nevada Day visitation was the first
22 time you had overnights, correct?

23 A No.

24 Q When did you have overnights before Nevada Day?

1 A I had overnights from the second court date.

2 Q That was after Nevada Day, right?

3 A No, it wasn't.

4 Q (Indiscernible).

5 A No, I didn't.

6 Q Okay. Why has Abigail stopped going to Herman's
7 house after that Nevada Day weekend?

8 A Yes, there was an issue between her and -- her and
9 her dad on that weekend.

10 Q Why?

11 A She and her dad was in an altercation of some sort
12 and he and I -- as a matter of fact, he communicated the
13 things that she did and because I did not support his actions
14 of what he wanted to do that was the problem.

15 Q So did you encourage Abigail to not go back with
16 Herman then?

17 A No, I did not.

18 Q Because you didn't -- because you didn't agree with
19 Herman's form of discipline?

20 A I'm sorry, I didn't hear a question.

21 Q Because you didn't agree with Herman's form of
22 discipline you allowed Abigail to stay with you, right?

23 A No, that was not it.

24 Q Okay. There's been an -- there's been a standing

1 order that Herman is supposed to have weekends with Abigail,
2 right?

3 A Yes, Mr. Robbins. And Herman, your client, has
4 not --

5 MR. ROBBINS: Move to strike --

6 A -- made --

7 MR. ROBBINS: -- as non-responsive.

8 A -- any efforts to --

9 MR. ROBBINS: Move to strike --

10 A -- (indiscernible).

11 THE COURT: Okay.

12 MR. ROBBINS: -- as non-responsive.

13 THE COURT: Hold on. That will be -- that will be
14 sustained. You need to ask -- answer the question that's
15 posed in front of you. If your client wishes to expand on
16 that, he can go ahead when he does redirect.

17 BY MR. ROBBINS:

18 Q Okay. Now Herman brings the children to you every
19 Friday, right? The boys.

20 A Correct.

21 Q And you -- and then that's how you do your
22 exchanges, right? Right?

23 A Correct.

24 Q Okay. Why is Abigail not present during those

1 exchanges?

2 A Because that was not what was ordered.

3 Q So how was Abigail supposed to get to Herman's
4 house? What's your understanding of that?

5 A He was at -- okay. Per the understanding of the
6 order, Abigail had after school activities and Herman was
7 supposed to make arrangements to pick Abigail up after -- for
8 after school activities.

9 Q What is her -- what are her after school activities?

10 A At the time, she was playing flag football --

11 Q I'm talking about --

12 A -- and she had --

13 Q -- right now.

14 A -- after school --

15 Q I'm talking about right now.

16 A Oh, to --

17 Q I'm sorry?

18 A -- to note, okay, to -- to note --

19 MR. TOTI: Just answer the question.

20 Q Now, what are her after school activities now?

21 A None.

22 Q So why -- why does she not go to Herman's house on
23 Friday, this past Friday?

24 A Abigail goes to the pick up spot most Fridays.

1 Herman has not engaged in any type of communication or
2 activities with Abigail.

3 Q Didn't you just say that she wasn't there during the
4 pick up spots on Fridays because that's not the order?

5 A No, what you --

6 THE COURT: Hold on.

7 A -- asked me --

8 THE COURT: I -- I'm -- yeah, Mr. Robbins, based
9 upon your reports, is Abigail even in this factor? It looks
10 to me like you're stating that he's not asking for primary
11 custody of --

12 MR. ROBBINS: We're not --

13 THE COURT: -- Abigail.

14 MR. ROBBINS: -- asking for -- we're not asking for
15 primary custody, Your Honor; however, there are contempt.
16 There is a contempt motion from Herman's side as well. There
17 is -- there is competing contempt motions. They both filed
18 contempts. And if Mom's not bringing the child on Friday as
19 she has been ordered to do, then she should also be held in
20 contempt.

21 THE COURT: One moment. I'm looking for something.

22 MR. ROBBINS: Now on our side, we were -- we were
23 willing to mutually waive contempt requests and -- and we're
24 still willing to mutually waive contempt requests if that's

1 agreeable by Mr. Toti and Ms. Williams.

2 THE COURT: What date did you file your order to
3 show cause, the actual order? I'm not seeing any.

4 MR. ROBBINS: Neither parties actually filed the
5 orders they were granted in --

6 THE COURT: Okay. So hold on. Nobody even filed
7 orders to show cause. Those will outright be denied on both
8 sides.

9 MR. ROBBINS: I don't be --

10 THE COURT: Procedurally it's inappropriate.

11 MR. ROBBINS: I believe --

12 THE COURT: So go ahead and continue on.

13 MR. ROBBINS: Thank you. The -- Your Honor, it's
14 also relevant for ability to co-parent and cooperation
15 regarding (indiscernible); it is relevant.

16 THE COURT: I just want to make sure we're on the
17 same page. He's not asking for -- he -- he's agreed that she
18 has primary custody of Abigail, correct?

19 MR. ROBBINS: Yes.

20 THE COURT: All right. So let's move on.

21 MR. ROBBINS: Okay.

22 BY MR. ROBBINS:

23 Q Have you ever -- strike that. How is your
24 relationship with the boys right now?

1 A Good.

2 Q How is your relationship with the boys?

3 A They are good.

4 Q Have they ever, since an order has been in place,
5 shown anything to you that would indicate that they don't want
6 to go to your house?

7 A Excuse me?

8 Q Have they ever, since an order has been in place,
9 done anything to show you that they do not want to go to your
10 house for any visit?

11 A I've had one occasion where the eldest Nathaniel,
12 i.e. Herman III, and that was secondary to him wanting to go
13 out with his friend and do something in North Las Vegas.

14 Q That's it?

15 A That is it.

16 Q Okay.

17 A I've had one issue -- as a matter of fact, let me
18 correct that. Picking up the children from school on Fridays
19 was very difficult because your client Herman Williams made it
20 difficult by telling the children they didn't have to go at
21 the time in which those events were occurring or relationship
22 were strained. Relationship was strained because of the
23 tensions that were running high regarding what was happening.
24 So during that time primarily I'm going to say the later part

1 of 2019, we were having troubles in early 2020. After that,
2 we didn't have any problems after that during pick up and the
3 children coming to my house.

4 Q Okay. (Indiscernible) do you return the children to
5 Herman?

6 A Excuse me?

7 Q What time do you return the children to Herman?

8 A Originally, it was ordered that I would return the
9 children -- I would drop them to school. And since school is
10 now virtual, the drop off time is 7:30.

11 Q Okay. You testified earlier that it's 7:30, 7:40 is
12 what you said, right?

13 A I said 7:30, 7:40 because depending on traffic I may
14 get there at 7:40. But 7:30, yes. And it's --

15 Q Okay.

16 A -- not an order. 7:30 was not an order.

17 Q Okay. But you guys agreed to return the children at
18 7:30 so that there would be time to -- to start them with
19 school, right?

20 A Correct.

21 Q Okay. Do you know what time they start school?

22 A They have different start schedules and I was told
23 it also changes. So one they start at 8:00 o'clock, one they
24 start at 8:30 or 9:05 depending on the days.

1 Q Okay. Do you feed the children breakfast on Monday
2 mornings?

3 A Excuse me?

4 Q Do you feed the children breakfast on Monday
5 mornings?

6 A Mr. Robbins, when the children get up, breakfast is
7 there. If they don't want to eat, I can't force them to eat.
8 The issue at hand has been your client would take them to
9 McDonald's and they would prefer to eat at McDonald's so they
10 would not eat the home cooked meal. So they would opt not to
11 eat the home cooked meal so they can have McDonald's.

12 Q You stated that -- that you and Herman don't
13 communicate at all, correct?

14 A At this moment, yes.

15 Q When was the last time you've talked to Herman in
16 any capacity?

17 A Repeat once more.

18 Q When was the last time you spoke with Herman in any
19 capacity?

20 A The last issue we had when he came -- when he
21 refused to give me Elisha when it was Friday evening and we
22 actually had a verbal argument. So it was not a conversation.
23 So every -- and every issue with pick up was an argument. So
24 it was not a conversation.

1 Q Okay. When -- when you say Herman refused to give
2 you Elisha, when was that?

3 A In all honesty, Mr. Robbins, I --

4 Q January 20 -- January 2020, right?

5 A It may have been that when Elisha -- he stated
6 Elisha was ill. And, again, I've communicated on many
7 occasions that -- and -- and he is well aware. I am a nurse
8 and if Elisha is ill, I can take care of my son.

9 Q Okay.

10 A That was no excuse for --

11 MR. ROBBINS: Your Honor --

12 THE COURT: And -- and I'm just going to interject
13 here. Mr. Toti, please instruct your client to answer the
14 questions.

15 MR. TOTI: Yes, Judge. And -- and if -- if Your
16 Honor if I may just please --

17 THE COURT: Yes, please. Just for a moment. All
18 right. Mr. Robbins, next question, please.

19 MR. ROBBINS: Okay.

20 BY MR. ROBBINS:

21 Q Herman communicated to you beforehand that Elisha
22 was sick, correct? Did you hear my question?

23 A I -- I -- Mr. Robbins, it's been so long, I am
24 trying to make sure I answer the question with upmost honesty.

1 I believe the time in which he communicated that the high
2 conflict was sick was through the attorneys when I went to
3 pick Elisha up.

4 Q Okay. Were you aware that Elisha had been held home
5 from school that week?

6 A Again, that information was communicated at that
7 particular time.

8 Q Okay. Do you think that it was best for Elisha if
9 he was home sick for the week and home sick in bed to force
10 him to go through a custody exchange?

11 A Mr. Robbins, yes.

12 Q Okay. When did Abigail start attending Nevada State
13 High School?

14 A That would be August of 2020.

15 Q Did you make Herman aware that Abigail was changing
16 high schools?

17 A There was no way to communicate that with him.

18 Q She previously attended what -- what school?

19 A Desert --

20 Q Desert Oasis?

21 A Oh, lord. Diamond --

22 Q Was it Desert --

23 A Desert --

24 Q -- Oasis?

1 A -- Oasis. Yes.

2 Q Okay. Okay.

3 A Desert.

4 Q Okay. There's been numerous communications that
5 have gone back and forth between your attorney and myself,
6 isn't that right?

7 A Correct.

8 Q So if you had to communicate something to him, you
9 always could have told your attorney, right?

10 A Correct.

11 Q Okay. But you didn't tell him that Abigail was
12 switching schools?

13 A We were supposed to communicate via the app.

14 Q Okay. Does Herman have access to Abigail's grades
15 if you were to ask the school?

16 A Yes, he does.

17 Q He's listed as the parent?

18 A He's listed as a parent.

19 Q Okay. Have you -- do you know where Herman
20 currently resides?

21 A I have it on my paperwork in North Las Vegas. I
22 don't know the exact address, but I'm aware of the
23 (indiscernible).

24 Q Are you aware of where Herman was living in May of

1 2020?

2 A Other than his current or the location listed, the
3 apartment buildings on Craig -- off Craig thereabouts in North
4 Las Vegas.

5 Q Do you recall going to his apartment in May of 2020?

6 A Yes, to pick up Elisha.

7 Q What happened during that exchange?

8 A He refused to have -- bring Elisha and therefore I
9 used my vehicle to block his and I called 911 to assist --

10 Q You --

11 A -- with --

12 Q Okay.

13 A I called 911.

14 Q And you didn't just block Herman's car. You blocked
15 the gate to exit that apartment complex, right?

16 A Mr. Kenneth, other cars were allowed to leave.

17 Q But you put --

18 A So --

19 Q -- your -- you placed -- you placed your car in
20 front of the gate, correct?

21 A Mr. Kenneth, other cars were allowed to leave.

22 THE COURT: Mr. Toti, this is going to be the -- the
23 last time I -- I need to instruct -- we're wasting valuable
24 time. Can you please instruct your client to answer the

1 questions?

2 MR. TOTI: Yes, Judge. Just -- Yes, Your Honor.

3 THE COURT: We only have a certain amount of time.

4 THE WITNESS: What's -- what's the question again?

5 BY MR. ROBBINS:

6 Q You placed your car outside of the gate to the
7 apartment complex.

8 A Inside the gate. Yes.

9 Q Okay. Okay. Inside the gate. And you refused to
10 move your -- your vehicle, correct?

11 A Correct.

12 Q Okay. Are you aware that Herman got evicted due to
13 your actions?

14 A No, I'm not aware of that.

15 Q You know that he moved recently after that -- in --
16 in a short time after that event happened, correct?

17 A I'm sure I was notified. Yes.

18 Q Nothing -- do you think that was the appropriate
19 response to what you claim is Herman withholding the child
20 from you?

21 A Mr. Robbins, he's done that on many occasions and I
22 was very frustrated at that point in time.

23 Q Oh, was that the appropriate response?

24 A Yes, I felt that was the appropriate response at

1 that time.

2 Q Okay. So if something like that were to happen
3 again, would that be your response again?

4 A No.

5 Q Even though you believe it was appropriate.

6 A My response was at that time.

7 Q Okay. So what's changed since then and now that you
8 don't think it would be appropriate now?

9 A Well, I realize that 911 does nothing. So trying to
10 have him stay there where I call the cops to assist with
11 transitioning the children does nothing.

12 Q Okay. Let's switch gears and talk about finances.
13 You stated in -- in your most recent financial disclosure form
14 that you filed you stated that you earn approximately a
15 hundred and fifteen thousand dollars a year; is that right?

16 A Correct.

17 Q Did you -- and you've stated you've been in the same
18 job for the past six years, correct?

19 A Correct.

20 Q Have you gone -- have you been demoted in any way in
21 the past year?

22 A No.

23 Q Or --

24 A No, I haven't.

1 Q -- let me rephrase that. In the past two years?

2 A No, I haven't.

3 Q Have you cut your own hours in the past two years?

4 A No, I haven't.

5 Q Have you taken a decrease in salary in the last two
6 years?

7 A No, I haven't.

8 Q Okay. Did you -- you filed a financial disclosure
9 form in -- on January 3rd, 2020 where you claimed that you had
10 earned \$159,265.55 through mid December of 2019. Is --

11 A Okay.

12 Q -- that correct?

13 A Yes. Correct.

14 Q And your bank -- and your pay stubs back that up,
15 correct?

16 A Correct.

17 Q Okay. So why this year are you only earning a
18 hundred and fifteen thousand dollars a year?

19 A Well, the company went through restructuring and
20 there's no more per diem full time per -- I'm saying -- sorry,
21 per visit full-time and I moved to salaried as that was the
22 only option. So that is my current salary. So no, there was
23 no demotion.

24 Q Okay. Well, you took a -- there was a reduction in

1 pay.

2 A Right. Because they moved to salary.

3 Q Okay.

4 A It was no longer per visit.

5 Q You've always been the one that has primarily been
6 responsible for the finances of the family, correct?

7 A Correct.

8 Q And you and Herman have been married for how many
9 years?

10 A Since 2004.

11 Q And during the entirety of your marriage, you've
12 always made more than Herman, right?

13 A Most, yes.

14 Q Okay. And you've been primarily responsible for
15 bills that you guys incurred, correct?

16 A Responsible for what, I'm sorry?

17 Q Bills.

18 A Correct.

19 Q Okay. Herman started his tow trucking business
20 after you guys separated, correct?

21 A False.

22 Q When did he start his tow trucking company?

23 A From November of 2018.

24 Q Okay.

1 A Actually --

2 Q (Indiscernible) --

3 A -- more prior to that because he started with Copart
4 in November of 2018.

5 Q Is there a difference in the tow truck abilities of
6 the 2015 Silverado and the 2004 Silverado that you're aware
7 of?

8 A Once more, please.

9 Q Are there differences in the towing ability of the
10 2015 Silverado and the 2004 Silverado?

11 A Yes, there is.

12 Q What are the differences?

13 A One has a fold out lift. One has an undercarriage
14 lift.

15 Q And is there -- does having a fold out lift versus
16 an undercarriage lift a -- affect what types of cars a truck
17 can tow?

18 A I don't know.

19 Q Okay. Has Herman ever told you that the 2004
20 Silverado cannot tow all of the cars that the 2015 Silverado
21 could?

22 A I don't recall.

23 Q Okay. Tools that you say Herman took -- who bought
24 those tools?

1 A Myself and him and I gave him the money through the
2 business to purchase those tools.

3 Q Okay. The majority of those tools were actually
4 purchased by Herman's uncle, correct?

5 A False.

6 Q In fact, those tools that actually are engraved with
7 his uncle's name, correct?

8 A I am not aware.

9 Q Okay. There's been items that are -- that have been
10 in your house that Herman has asked for, right?

11 A Herman has asked for items that are not in my home.

12 Q Okay. He asked for a trampoline that was there,
13 right?

14 A The trampoline is not there.

15 Q Where did it go?

16 A The trampoline was discarded because it was broken.

17 Q You threw it away?

18 A Yes, it was thrown away.

19 Q Okay. There was also a barbeque, the barbeque
20 grill.

21 A The grill was during my move. The grill was placed
22 on the outside of the property and he was given ample time to
23 pick up those items which he did not.

24 Q Okay. Know his scaffolding that he's asked for?

1 A I purchased those.

2 Q There was a transmission?

3 A No, there is no transmission.

4 Q He's never asked you to have -- to get the
5 transmission back?

6 A There was no transmission.

7 Q Okay.

8 (COUNSEL AND CLIENT CONFER BRIEFLY)

9 Q There was a freezer as well, correct?

10 A Yes.

11 Q And he asked for the freezer?

12 A Mr. Robbins, the freezer was placed on the driveway
13 and he was given the information to pick up the --

14 Q How did you --

15 A -- items.

16 Q How did you provide that information when you say
17 you have no way to contact him?

18 A It went through the attorney.

19 Q Okay. So you have no verification whether he knew
20 of the day or time of when to pick these items up, right?

21 A Per the communications I received through my
22 attorney, he did not want those items.

23 Q Did you ever send insurance bills to Herman?

24 A Yes, they were sent through the attorney.

1 Q Did you ever file any motion at the time for him to
2 be reimbursed -- to him to reimburse you for those fees?

3 A No.

4 Q When -- what was the reason that the Court ordered
5 Herman to have possession of that 15 Silverado?

6 A Because Herman stated that was his only vehicle that
7 he was using for work.

8 Q Okay. And he -- he had been using it for work for
9 several months prior to that hearing, correct, when the --
10 when the Judge gave him exclusive possession of it?

11 A Yes.

12 Q Okay. And you cancelled his registration on that
13 truck, didn't you?

14 A Yes, I did.

15 Q Knowing that he was driving it for work and needed
16 it to make money you cancelled the registration.

17 A The registration was cancelled prior to any orders
18 received.

19 Q Well, why would you cancel the registration?

20 A Because I felt like he did not deserve the vehicle
21 and that he was lying.

22 Q Okay. So out of spite then you cancelled the
23 registration?

24 A No. I was paying for it and I felt I had the right

1 seeing that I was paying for my vehicle and he lied to obtain
2 possession thereafter.

3 Q Okay. Did you tell him that you were terminating
4 the -- the registration?

5 A No, I did not.

6 Q So you are allowing him to drive around and you know
7 that occasionally he drives around with the children in the
8 car, correct?

9 A Correct.

10 Q And you are allowing him to drive around with the
11 children in the car with no registration and not even a -- a
12 heads up that you had turned in the plates.

13 A There was no way to really let him know that because
14 Mr. Williams was ordered to use the app at the time.

15 Q No. No. This was before any orders to the app,
16 correct?

17 A We were ordered for the initial court date to use
18 the app to communicate.

19 Q When did you cancel the plates?

20 A Mr. -- Mr. Robbins, I -- I don't remember.

21 MR. ROBBINS: The Court's indulgence.

22 Q Herman paid the 2021 registration, correct?

23 A Sorry, did you ask me if Herman pay the 2021
24 registration?

1 Q Yes.

2 A Yes.

3 Q And how did he pay that registration?

4 A He dropped off the check to the attorney's office.

5 Q Okay. And you refused to allow Herman to register
6 the truck himself, didn't you?

7 A No, I did not.

8 Q Herman asked for the card that comes in the mail to
9 go register the truck, right?

10 A I have not received a card, Mr. Robbins.

11 Q How did you register the truck?

12 A Did it online.

13 Q And it was registered late, correct?

14 A It was.

15 Q And that was because you delayed the registration,
16 correct?

17 A No, I did not.

18 Q Okay. Herman covered that late charge as well,
19 right?

20 A He did.

21 Q Okay. Now I want to ask you about your debts. You
22 said that there is this consolidated debt of over \$20,000.
23 What was the source of that debt?

24 A The source of the debt was we had a tow -- tow

1 company and body shop back in New York. And I took out a loan
2 from Lending Tree to help to float him because things were
3 just not going so well. And then secondly he started
4 receiving fines from this New York City Department because of
5 an -- an altercation that he had with a neighbor so that just
6 resulted in some fines and it was just -- that's where that
7 money came from. So it was primarily that and then it was the
8 TimeCorp debt for the tow lift kit. It was the Financial
9 Pacific Debt Leasing for the spray booth. It was for a frame
10 machine. So that's all the debts I consolidated for that.

11 Q Okay. Wasn't there a printing machine that was also
12 purchased?

13 A That -- that printing machine was done by me and
14 that is for global finance, not a part of that debt,
15 completely separate. And that was purchased in October of
16 2018. So that has nothing to do with the consolidated.

17 Q Okay. How much was that printing machine?

18 A That printing machine was 35,000.

19 Q And did you pay that off in full?

20 A Nom, it was again Global Pacific -- Global Finance
21 Company. It's being leased.

22 Q Being leased but it was \$35,000?

23 A It's a lease so you have to take out a loan to lease
24 it. It's a leasing company.

1 Q Where is that machine now?
2 A That is currently in Jamaica.
3 Q Why? You heard my question?
4 A No, I didn't.
5 Q I said why? Why is it in Jamaica?
6 A Because -- because that's where it was intended to
7 go.
8 Q Who did you give it to?
9 A It's for a business in Jamaica.
10 Q Do you own a business in Jamaica?
11 A No, I don't.
12 Q Do you lease the printing machine for \$35,000 for
13 someone else's business?
14 A Yes.
15 Q Do you currently pay on that lease?
16 A Not at the moment. No.
17 Q Who pays on that lease?
18 A It has been in default -- well, it's -- it's on
19 deferment. Sorry, not default, because of COVID.
20 Q Okay. How much money have you paid towards that
21 lease?
22 A 1500 per month. And I paid that for --
23 Q How many --
24 A I'm sorry.

1 Q -- months? How many months have you been paying
2 1500 a month?

3 A I was paying 1500 a month of -- until December of
4 2019.

5 Q Okay. How many months did you pay \$1500 a month?
6 And so from when until December 2019?

7 A From -- oh, I would say about 14 months, 14 to 15
8 months.

9 Q And who was this machine the benefit for?

10 A That was supposed to be benefit for everyone;
11 however, as a secondary source of income, however things have
12 not gone well.

13 Q I'm a little confused. When you say everyone, who
14 are you referring to?

15 A The individuals that were in the household at that
16 particular point in time. It was supposed to be a second
17 source of income without me taking up a second job.

18 Q Okay. So another source of income for you and the
19 family?

20 A That was the plan, yes.

21 Q So why would you move it to Jamaica then?

22 A Because that's where the operation was. There is no
23 way I can operate it here.

24 Q Okay. And you stated earlier that it was a business

1 that you don't own. So how is it going to make you money?

2 A The plan was to obtain jobs and outsource them. But
3 again, things didn't work out how they were supposed to.

4 Q What morals -- I'm going to switch gears a little
5 back -- bit back, but what moral -- you stated that you think
6 that you should have primary physical custody because you're
7 able to instil better morals than Herman can. Can you explain
8 what that means?

9 A In all honesty, Mr. Robbins, it's -- it's kind of
10 hard to explain without getting into the he said, she said.
11 And I know we've had -- we have a short amount of time. But
12 to make it simple, it's -- it's the overall culture, health,
13 and well-being of the kids. It's really hard to explain again
14 without going -- going into the he said, she said. But it's
15 pretty simple.

16 Q Okay.

17 A Herman would feel like it's okay to swap parts for
18 vehicles in front of the children. Herman would feel --

19 Q Is that (indiscernible)?

20 A Yes, it is. It is. It is.

21 Q That's (indiscernible)? Okay.

22 A It is.

23 Q Are you aware that Abigail --

24 A Parts -- because the parts they know that do not --

1 MR. ROBBINS: There's no --

2 A -- belong --

3 MR. ROBBINS: -- pending question, Your Honor.

4 A Pardon?

5 THE COURT: And I'll strike that. You're going to
6 need to move on.

7 MR. ROBBINS: Okay.

8 BY MR. ROBBINS:

9 Q Are you aware that Abigail smokes marijuana?

10 A I was made aware during an altercation -- I'm going
11 to say Nevada Admission Day weekend. That same weekend that
12 was in question.

13 Q Okay. Who told you that she smokes marijuana?

14 A He communicated that she smoked marijuana.

15 Q He told you that he threw away her vape pen,
16 correct?

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

18 Q Okay. Did Herman tell you how he disciplines
19 Abigail for the marijuana?

20 A Actually, no, he did not tell me how he disciplined
21 Abigail.

22 Q He didn't tell you that he restricted her from her
23 phone usage as a punishment?

24 A No, he did not.

1 Q Or that he was taking away a party that she was
2 scheduled to have?

3 A No, he did not.

4 MR. ROBBINS: Okay. Nothing further.

5 THE COURT: Thank you. I'm going to let everyone
6 know it's 11:00 a.m. You have til 12:45. So everyone make
7 sure that you plan your times accordingly. Mr. Toti, any
8 other redirect?

9 MR. TOTI: Briefly, Judge; however, what I was going
10 to say to Your Honor is that we did the -- the circumstance
11 with Mr. Robbins in asking my client questions on cross of
12 course and I wouldn't -- and I -- strike all that. What I'm
13 trying to do, Judge, is is that I -- I would like to ask my --
14 my client a few questions on redirect and then if it's okay
15 with the court rather than calling Mr. Robbins' client I will
16 allow Mr. Robbins to call his client and then I can do like a
17 direct and a cross at the same time in an effort to maybe save
18 some time.

19 THE COURT: That's probably in -- in everyone's best
20 interest. So yes. Thank you. Finish up with your client
21 first.

22 MR. TOTI: Okay. Judge, do you mind if we take a
23 five minute break? I have to run to the restroom real quick.

24 THE COURT: All right. I'll take a five minute

1 break, but everyone I'm just letting you know at 12:45 I have
2 another court starting.

3 MR. TOTI: Understood. Thank you, Judge.

4 THE COURT: And my staff actually likes to take a
5 break as well. So --

6 MR. TOTI: Makes sense.

7 THE COURT: -- everyone bear in mind. Thank you.

8 MR. TOTI: Thanks, Judge.

9 (COURT RECESSED AT 11:10 AND RESUMED AT 11:15)

10 THE CLERK: We're back on the record.

11 THE COURT: Mr. Toti, redirect.

12 MR. TOTI: Thank you, Judge.

13 REDIRECT EXAMINATION

14 BY MR. TOTI:

15 Q Nadine, the incident wherein you blocked the -- the
16 exit -- or it was alleged that you blocked the exit to
17 Herman's apartment complex, can you apprise -- can you give
18 the Court a little bit more detail about exactly what happened
19 that day.

20 A Okay. So that day I went to the apartment complex
21 and I rang his doorbell. And he stated that he's not giving
22 me Elisha because he's not well. And I'm like okay, I'm a
23 nurse, I can take care of it. And besides I hadn't seen them
24 two weeks prior because again he had not dropped off the boys

1 the time before. So I hadn't seen them in awhile and I really
2 needed to see Elisha. And he -- it wasn't a thing where I
3 wasn't even allowed to see him, if the child is sick, let me
4 see him. And he refused and so he -- then he tried to drive
5 away. So I went back in my car. I blocked his vehicle and I
6 called 911 because I was told that they could assist in the --
7 transitioning the children seeing that there was a high
8 conflict. The vehicles were allowed to leave but his vehicle
9 the way it was blocked, he was not allowed to leave.

10 Q And you had indicated also that if something like
11 that happened in the future you wouldn't react the same way?

12 A No.

13 Q What would you do now?

14 A Well, in all honesty I would hope that it does not
15 happen but if it does, I'll do what I've done in the latter
16 cases where I've called 911. I'd get a -- I got a card with
17 the incident number and then just file a case in court.

18 Q Okay. There was also questions regarding Abigail's
19 conduct. Abigail is with you full-time, correct?

20 A Full-time.

21 Q And -- and you're responsible for disciplining her?

22 A Correct.

23 Q Okay. Have there been -- have there been occasions
24 in the last year or so where you've needed to discipline her?

1 A Yes. She's been grounded and I've turned off her
2 phone. We don't have to take it.

3 Q Okay.

4 A And so those have been the primary two sources, full
5 grounding, friends not allowed to come over, or turning off
6 her cell phone.

7 Q All right. And as -- as far as conduct, it almost
8 sounds as if there was an allegation that you had condoned
9 marijuana uses by Abigail; is that correct?

10 A That was an allegation, but it's false.

11 Q Okay.

12 A Abigail herself told me that she was smoking to deal
13 with the toxicity, her words not mine, that was happening
14 within the household. She was the one that told me --

15 MR. ROBBINS: Move to strike.

16 A -- that --

17 THE COURT: And that -- that'll be sustained.

18 BY MR. TOTI:

19 Q Again -- so again, the question is is that do you --
20 do you condone --

21 A No, I don't.

22 Q Okay. Is she allowed to smoke marijuana in your
23 house?

24 A No, she's not.

1 Q Okay. All right. Have there been any incidents or
2 issues regarding the other children and disciplining them
3 since you've had the overnights again?

4 A No.

5 Q Okay. The Court -- there were questions to you
6 regarding a few various household goods. I think a
7 trampoline, a -- a barbeque grill, and a few things of that
8 nature.

9 A Okay.

10 Q You had indicated that you placed these items out
11 for Herman's retrieval. When was that?

12 A I moved in March of 2020. I did alert this office
13 that I was moving and that this was a last date in order for
14 him to pick up the items. And I was given a time in which I
15 needed to pick the items up that he would get them. And those
16 items were left -- I actually had it recorded where he did not
17 at any point in time come and pick them up at a specified time
18 he said he would pick them up.

19 MR. TOTI: Judge, that's all we have for redirect.

20 THE COURT: Thank you. Any recross?

21 RE CROSS EXAMINATION

22 BY MR. ROBBINS:

23 Q How much notice did you give Herman to pick up those
24 items?

1 A Mr. Robbins, I do not remember, but he agreed to
2 pick up the items between --

3 MR. ROBBINS: Move to strike --

4 A -- certain hours --

5 MR. ROBBINS: -- as non-responsive.

6 THE COURT: All right. She doesn't remember as the
7 response. Thank you. The rest --

8 MR. ROBBINS: No other questions.

9 THE COURT: -- will be stricken. Okay. At this
10 point subject to recall, Mr. Toti?

11 MR. TOTI: Yes, Judge.

12 THE COURT: Thank you. And at this point you were
13 saying your only other witness is Mr. Williams. And so you
14 are going to do that at the same time with Mr. Robbins; is
15 that correct?

16 MR. TOTI: Yes, I'll defer to cross and direct at
17 the same time.

18 THE COURT: All right. Mr. Robbins, I'm assuming
19 you don't have an issue with that for time sake.

20 MR. ROBBINS: That's fine.

21 THE COURT: All right. So at this point then Mr.
22 Toti what I'm going to do is I'm going to go to Mr. Robbins so
23 he can call his client.

24 MR. TOTI: Yes, Judge.

1 THE COURT: Thank you. Go ahead, Mr. Robbins.

2 MR. ROBBINS: I'll call Herman Williams.

3 THE COURT: Thank you. Mr. Williams, please raise
4 your right arm.

5 THE CLERK: You do solemnly swear that the testimony
6 you're about to give in this action shall be the truth, the
7 whole truth, and nothing but the truth, so help you God?

8 MR. WILLIAMS: Yes.

9 THE CLERK: Thank you.

10 THE COURT: Go ahead, Mr. Robbins.

11 MR. ROBBINS: Okay.

12 HERMAN WILLIAMS

13 called as a witness on his own behalf, having been first duly
14 sworn, testified upon his oath as follows on:

15 DIRECT EXAMINATION

16 BY MR. ROBBINS:

17 Q Mr. Williams, can you state your name and spell it
18 for the record?

19 A Herman Williams, H-e-r-m-a-n, Williams,
20 W-i-l-l-i-a-m-s.

21 Q Okay. And Mr. Williams, you heard in the beginning
22 of the testimony of Mrs. Williams statements in regards to
23 your divorce about wanting to be divorced and no longer being
24 compatible and no chance for reconciliation. Are you in

1 agreement with those items?

2 A Yes.

3 Q Okay. And you wish to be divorced today?

4 A Yes.

5 Q And you have four children?

6 A Yes, I do. Abigail Williams, Herman Williams,
7 Matthew Williams, and Elisha Williams.

8 Q And do you have another child outside of this
9 marriage?

10 A Yes, I do. And she's 27. Her name is Kadeja Ouda
11 (ph) and she live in Virginia.

12 Q Okay. And what type of custody arrangement are you
13 seeking?

14 A Sole custody of my boys.

15 Q And what about with Abigail?

16 A I would like to have her too, but I want a
17 relationship with Abigail.

18 Q Do you think at this time a relationship where she's
19 primarily living with you is feasible?

20 A Yeah.

21 Q What would have to occur for that to happen?

22 A They'll have to be dropped off like I dropped the
23 boys off to see her, spend time with her.

24 Q And when was your last visitation with Abigail?

1 A January of 2020.

2 Q And how long was that visitation?

3 A A night.

4 Q How long was Abigail supposed to be in your care?

5 A She's supposed -- I supposed to return her back to
6 school on Monday.

7 Q So how did she leave your residence?

8 A Went in the room, she locked herself in the room, I
9 went to sleep. When I woke in the morning time knocking on
10 her door, Abigail was not there. Oh, I picked the lock. My
11 backdoor was open. The patio door was open. I called the
12 police, thought -- called the police and told them she ran
13 away. Then I called the mother and told her. She said she
14 didn't run away. So we got to arguing and I hang the phone up
15 on her.

16 Q Did -- did Nadine tell you where Abigail was?

17 A No.

18 Q Did she tell you how she knew that she did not run
19 away?

20 A No.

21 Q Did she tell you that she's had any communication
22 with the police?

23 A She said that she called because Abigail did not run
24 away.

1 Q She said she called the police?

2 A Yeah.

3 Q Okay. Do you -- are you aware of where Abigail was
4 that next day?

5 A Back in her house when -- no, didn't know until the
6 boys got back home.

7 Q The following week?

8 A So when the boys got back home Sunday -- Monday they
9 said Abigail was in the house.

10 Q Okay. So during that visitation period the boys
11 were with Nadine and Abigail was with you.

12 A Abigail supposed to be with me.

13 Q Okay. And since that time have you had any
14 communication with Abigail?

15 A No.

16 Q And do you know Abigail's phone number?

17 A No.

18 Q Do you know if Abigail has a phone?

19 A Yes, she has a phone.

20 Q Who bought that phone?

21 A Her mother did.

22 Q How do you know?

23 A Because the phone that -- I had the phone number
24 that my mother paid for is off.

1 Q Okay. What was the reason that that phone was
2 turned off?

3 A The one that my mother bought?

4 Q Yes.

5 A Because she had a new phone.

6 Q Okay. Who turned that number off?

7 A My mother and my sister was paying for the phone
8 bill. After she left, my mother turned off the bill --

9 Q Okay.

10 A -- turned off the phone.

11 Q Okay. Did you ever catch Abigail with marijuana?

12 A Didn't physical see it. The boys was going down the
13 steps and found an ink pen -- or a vape pen. Came back and
14 says to me and I said what do you got in your hand. They said
15 we found this downstairs. Well, Abigail was pacing back and
16 forth, back and forth looking for a pen she said belonged to a
17 friend. Just left it alone. I threw it in the garbage. And
18 didn't pay no mind. After Abigail left, we was cleaning up
19 the room and that's when the boys came and asked me can they
20 borrow her I -- her ear buds. I said go get it, the box is
21 right there. When they opened the box, another one was in
22 there with the liquid for it. And I still have it.

23 Q Okay. You didn't throw that one away?

24 A No.

1 Q Okay. Did you tell Nadine about the marijuana?

2 A I told her the day when she came to get them the
3 Nevada weekend and it was gone -- she -- Abigail came with her
4 and she was taking out like her clothes. And I said where are
5 you going, you're only going for the weekend. You don't need
6 that. You don't need that much clothes. And she kept -- oh,
7 you're throwing me out. I said listen, she cannot have the
8 party because she's smoking weed and she's grounded.

9 Q You said that to Nadine?

10 A I said it to Nadine and --

11 Q Okay.

12 A -- then Nadine said I will deal with it, stop
13 yelling.

14 MR. TOTI: Your Honor, I -- I appreciate some of
15 this, but it's just too much hearsay and I would have to
16 object.

17 THE COURT: Sustained.

18 BY MR. ROBBINS:

19 Q Okay. To your knowledge, has Nadine encouraged
20 Abigail to have any contact with you?

21 A She don't bring her and drop her off like she
22 supposed to.

23 Q Okay. During the exchanges when you bring the --
24 the boys on Fridays, is Abigail present?

1 A Every now and then.

2 Q Okay. Have you ever tried to have Abigail come with
3 you when you're -- after you dropped off the boys?

4 A I don't get out the car because I don't want no
5 conflict with Nadine. So I pull up, the boys get out, they
6 lock the door, bye daddy, I tell them bye, and I drop them
7 off.

8 Q Okay. Have you ever witnessed Nadine being violent
9 towards the children?

10 A No, not when I'm around.

11 Q Okay. Do you have -- have you -- have you witnessed
12 a scar on Abigail's forehead?

13 A Yes.

14 Q Are you aware of how she received that scar?

15 A Yes.

16 Q Are you aware of how she receive that scar?

17 A Yes.

18 Q How did she receive the scar?

19 A By Nadine hitting her with a PC pipe on her
20 forehead.

21 Q How did you become aware that that's how she
22 received that scar?

23 A I was in New York working. Nadine called me and she
24 was telling me everything that Abigail was doing with the boys

1 in the house. I said when you come down here this weekend,
2 we'll sit down and talk about it. And minutes later Abigail
3 called me hollering and screaming. I told her put her mother
4 on the phone. Mother said it slipped and me and her got to
5 arguing on the phone about it. And she said I just had
6 enough, it slipped, I'm sorry. And --

7 Q So did Nadine tell you that she hit her with a pipe?

8 A She told me she -- she told me she hit her with a
9 pipe.

10 Q Okay. Have you ever witni -- or have -- do you have
11 knowledge of Nadine ever hitting Abigail with any other
12 objects?

13 A The frying pan she hit her with, but changing her
14 clothes on the street. She didn't want her wearing tights
15 after --

16 MR. TOTI: Your Honor --

17 A -- they left the house.

18 MR. TOTI: -- I'm going to object. Foundation.

19 THE COURT: Sustained.

20 BY MR. ROBBINS:

21 Q When did -- okay. How do you know of any type of
22 violence towards Abigail?

23 A Because Abigail would tell me.

24 Q Okay. And what time period are we talking about?

1 A She'll call me like when the mother leaves the house
2 on the phone.

3 Q No, but what month and what year?

4 A This was 2018 when I -- '18? '17 when I was in New
5 York.

6 Q Okay. And have you ever known Abi -- I'm sorry.
7 Have you ever known Nadine to hit the boys?

8 A Yeah.

9 Q When did Nadine hit the boys?

10 A Every time they would do something wrong.

11 Q And --

12 MR. TOTI: Objection, Your Honor.

13 THE COURT: Sus -- it's going to be sustained. He
14 said he never witnessed an being violent around the children.
15 So Mr. Robbins, at this point, please move on.

16 MR. ROBBINS: Okay.

17 BY MR. ROBBINS:

18 Q What would be your preferred visitation schedule for
19 Nadine and the boys?

20 A They can have just like how we've been doing with
21 the holiday schedules from the courts. She can have every
22 other weekend.

23 Q And so that would be still Friday til Monday
24 morning?

1 A It -- it would be Friday at 5:00 o'clock to Sunday
2 at 8:00 o'clock.

3 Q 8:00 p.m.?

4 A 8:00 p.m.

5 Q And why do you ask that the -- that she bring the
6 children back at 8:00 p.m. on Sunday rather than Monday
7 morning as you've been doing?

8 A Because when they come in the morning time they cry
9 and they're hungry. Their face is not cleaned, hair is not
10 combed. So I don't want them to go straight to school like
11 that and then I'm going to get the phone call. I rather have
12 them there, settle them there, and I can drop them to school
13 on Monday morning.

14 Q Okay. Have the children been late on Mondays due to
15 any fault of Nadine?

16 A Yes.

17 Q Can you explain?

18 A She gets there sometimes 7:30, 7:40. Herman starts
19 school at 8:05 every week -- every day. Matthew and Elisha
20 start school at 9:45. So they're not late, but Herman is
21 late.

22 Q Okay. How long does it take you to get from the
23 exchange location back to your house?

24 A With the traffic, 23 minutes.

1 Q Okay. And the children are in remote learning, is
2 that right?

3 A Yes.

4 Q Okay. So they -- so he needs to log on by 8:05 at
5 your house.

6 A Yes.

7 Q Okay. So if she drops them off at 7:40, does that
8 -- has that given you enough time to get home --

9 A No.

10 Q -- didn't have them online on time?

11 A No.

12 Q Okay. And there was testimony about eating
13 breakfast. Do you know if the children have eaten breakfast
14 when they come to you Mondays?

15 A Yeah, get in the car and they say can we go to
16 McDonald's. No, we don't have the time for McDonald's. No,
17 we don't have the time for McDonald's. Let me get McDonald's
18 on Fridays when -- before I drop them off to her.

19 Q Okay. What do you normally feed them?

20 A They get rice and chicken Monday, spaghetti on
21 Tuesday, Wednesday, taco -- homemade tacos, Thursday, pizza
22 from the supermarket. They cook them -- we cook it in the
23 oven. And then Fridays they get McDonald's.

24 Q Okay. Now, what type of communication do you have

1 with Nadine?

2 A None.

3 Q And you're aware that there was an order that you
4 signed up for a talking app, I think it was AppClose, correct?

5 A Yes.

6 Q Okay. Did you ever sign up for AppClose?

7 A I signed up on the one phone that I had. Abigail
8 left. That phone came up missing. Can't find the phone. I
9 had a flip phone.

10 Q Hold on. So you were signed up AppClose at least
11 for some period of time.

12 A Yes.

13 Q And did you and Nadine communicate on AppClose
14 during the time that you were signed up?

15 A No, because when I did it, she have to accept me.
16 She never accept me. I was paying her \$5 but she didn't
17 accept me for it to go all the way through.

18 Q Okay. Now you said you no longer had the phone.
19 What happened to that phone?

20 A It dis -- disappeared when Abigail left. Can't find
21 it. It's nowhere in the house.

22 Q When was the last time you saw the phone?

23 A That was December 20 I think when we went to court
24 because I did it in -- right in the courtroom I did the app.

1 And when I came home the next couple days the phone was no
2 longer to be found.

3 Q Okay. Did you have another phone that was
4 accessible with AppClose?

5 A No.

6 Q What type of phone were you using?

7 A A flip phone.

8 Q Do you currently have a phone that has ability to
9 use AppClose?

10 A Now I do.

11 Q When did you get a new phone?

12 A Christmas.

13 Q Christmas of what year?

14 A This year, 2020.

15 Q Okay. And have you downloaded AppClose onto this
16 new phone?

17 A No.

18 Q Do you intend to?

19 A Yes.

20 Q Okay. And do you believe that moving forward you'll
21 be able to communication with Nadine using some sort of
22 talking app?

23 A Yes.

24 Q Okay. Have there ever been violence between you and

1 Nadine?

2 A Not -- not physical fight, just arguing.

3 Q Okay. How would you describe the -- the level of
4 arguing?

5 A We get to arguing and I get to walking out, get in
6 my truck and drive off.

7 Q Is the -- how would you describe the level of
8 conflict?

9 A I think --

10 Q Is it still -- is the level of conflict still
11 extremely high?

12 A Yes.

13 Q Do you think it's something that can be fixed at any
14 point? I want to ask you about this incident that occurred at
15 your apartment complex. When did t his happen?

16 A January -- or I can't remember the date. January
17 22nd. January 22nd.

18 Q Of what year?

19 A Of 2020.

20 Q Okay. And what happened on that day?

21 A The lawyer called and said -- my lawyer's office
22 called me and said that she wanted the kids, wanted Elisha.
23 And I told her no, Elisha's been sick for the whole week he's
24 been out of school. I'm not giving him sick; he's on

1 medication. The next thing I know my door knocks. I go
2 downstairs and I open the door. It's her and Abigail standing
3 there. I want Elisha, just locked my door and walked away
4 from the mom. Got in my truck. She blocked me. I went
5 around the --

6 Q Hold on.

7 A -- back --

8 Q Hold on. When you say she blocked you, what do you
9 mean exactly?

10 A She reversed her car to block me in the court.

11 Q Okay. Was that just on your street or -- like --

12 A That was in a parking lot in the back.

13 Q Okay.

14 A On the side of the house.

15 Q How were you finally able to exit the premises?

16 A Backed up, parked the trunk in the garage and went
17 out the back gate.

18 Q Okay. Were you intending to work that day?

19 A I was at work. I came to bring my mother Laura (ph)
20 home.

21 Q Okay. And what do you do for work?

22 A Tow truck.

23 Q You drive a tow truck?

24 A Contract work for Copart.

1 Q Okay. And so how do you get jobs?

2 A Through Copart.

3 Q What do they do? They call you and tell you there's
4 a job?

5 A No, it's an app. They give me six calls a day and I
6 have to go pick them up. Body shops, houses, tow yards.

7 Q Okay. You say six. Is there a limit on the amount
8 of cars that you can --

9 A No.

10 Q Okay. But its average is six?

11 A They start off in one time with six.

12 Q Okay. They give you six at one time?

13 A Yes.

14 Q Okay. And how much do you get paid per vehicle that
15 you tow?

16 A Each vehicle is a different zone. So zone two is
17 \$34. And zone three is \$39. Zone four is \$41 and it keeps
18 going up.

19 Q Okay. How much -- do you know how much you average
20 on a weekly basis?

21 A Sometimes it's 1300, sometimes it's 1500, sometimes
22 it's 1200.

23 Q And what car do you use to tow?

24 A It's 2015 Chevy Silverado and sometime the 2004.

1 Q Okay. What is the difference between the two tow
2 trucks?

3 A One is a wheel lift that grabs the two front wheels
4 and lift it up and one is a flip out crane that only can get
5 cars that has metal bumpers or been into an accident. If I
6 put the flip out crane on a new car that's not hitting the
7 front, I'll mess up the front bump in the grill.

8 Q Okay. Which car -- which of the two trucks has the
9 -- has the tow that you -- you would be able to pick up any
10 car?

11 A The 2015.

12 Q Okay. So is that the vehicle you use most often to
13 pick up truck --

14 A That's the --

15 Q -- to pick up majority of all the cars.

16 A -- vehicle I use to pick up the majority of all the
17 cars.

18 Q Okay. And are you asking to keep that vehicle?

19 A Yes.

20 Q What would happen if that vehicle were to be awarded
21 to Nadine?

22 A I won't have no job to take care of me and my kids.

23 Q Okay. Going back to that incident, was she blocking
24 other vehicles from leaving the premises?

1 A She was blocking the -- the exit gate and her friend
2 was blocking the entrance gate. So when I tried to back up
3 from her to go out the other way, the entrance way, he is
4 standing in front of the way for me to get out. So I just got
5 tired of it. I just backed up and put the car in the garage
6 and went through the back gate on both of them. There was
7 only one way in and one way out. So the cars were being
8 blocked by both of them. So even if he moved out the way, I
9 can squeeze through, he would still back in the way and let
10 the car come in and block me.

11 Q Okay. Were they blocking other vehicles from
12 exiting or entering?

13 A Yes.

14 Q And did your apartment complex contact you about
15 this issue?

16 A They contacted me and called me to the rent office.
17 My renewal was supposed to be May. The -- no, the renewal was
18 supposed to be March. March it's supposed to be renewed.
19 They gave me up until May to move out because they said I
20 disturb the complex and it's in my contract that I wasn't
21 supposed to have no type of disturbance out there in the
22 complex.

23 Q Okay. How do you describe your relationship with
24 the boys?

1 A We're great. I mean, I'm their dad and their
2 friend. I mean, it's complicated. It's like they can talk to
3 me and I can talk back to them. But if they do something
4 wrong, they start losing stuff, their Xbox, their cell phone.
5 But otherwise we're great.

6 Q Okay. Do you ever use any type of physical
7 punishment.

8 A No, not no beatings and nothing like that. Just
9 yelling and scream.

10 Q Okay. Have you ever used any physical punishment
11 with Abigail?

12 A Yell and scream.

13 Q Okay. There was talk about debts that you and
14 Nadine have together, this consolidated loan. Are there any
15 other debts that you guys have?

16 A A medical bill.

17 Q What type of medical bills do you have?

18 A It's 68,000.

19 Q And what was the source of this medical bill?

20 A Because I didn't have no insurance.

21 Q Who's in -- were you previously part of Nadine's
22 insurance?

23 A No.

24 Q Have you ever been on her insurance?

1 A When we were in New York I was. We got down here in
2 2015 she said it was too expensive to have me and her and the
3 kids, all of us to be on it. It was too expensive for herself
4 was on it.

5 Q Okay. Do you know if the kids are on her insurance?

6 A The -- we -- we only had dental and eye doctor.

7 Q No medical insurance?

8 A No medical insurance.

9 Q Are there any medical bills for the children?

10 A No.

11 Q Okay. Are you asking her to -- are you currently
12 paying on the medical bills?

13 A No.

14 Q Have they been after you for -- has any creditors
15 been after you?

16 A No.

17 Q Are you asking her that she be responsible for these
18 medical bills?

19 A (No audible response)

20 Q There was -- are you aware of a tax bill?

21 A No.

22 Q There was a -- you guys owe any taxes to the state
23 of Connecticut?

24 A Not -- not me recalling any.

1 Q Okay. What about on these cars to the city?

2 A I thought I -- when you transfer the plates they
3 don't charge you. We (indiscernible) but we kept the plates.
4 We didn't turn the plates into DMV when we transferred the
5 plates off to Vegas.

6 Q Why not?

7 A It was down here. No, we was up there. We just
8 never turned them back in.

9 Q Okay. Are you aware of this printing machine that
10 Nadine had?

11 A When she bought it. I was there when it came --
12 shipped off to the house. When they delivered to the house I
13 was there.

14 Q What was the purpose of purchasing the -- the
15 printing machine?

16 A Told me I have no concern of it. Don't worry about
17 the machine.

18 Q Okay. Are you aware that she was paying \$1500 a
19 month for the machine?

20 A No, she never told me how much she was paying.

21 Q Okay. Were you aware that the machine was located
22 in Jamaica?

23 A Yes, I was there when it got shipped off.

24 Q Do you object to that?

1 A No.

2 Q Are you aware if Nadine owns a firearm?

3 A Yes, she do.

4 Q How many firearms does she own?

5 A Two.

6 Q Where does she keep the firearm?

7 A I don't know recently now because we don't live
8 together, but when we was living together one was in the
9 closet in the bathroom and the living closet. That was a nine
10 millimeter. And the put together gun was in a closet on the
11 floor behind the luggage.

12 Q Did the children know where it is where either of
13 those guns were?

14 A They probably seen it. Well, Abigail knew where it
15 was at.

16 Q Do you know if the children have ever held the guns?

17 A One time.

18 Q When was that?

19 A Just recently when they moved. The kids told me
20 that they -- they was -- they had it in their hand. She took
21 the clip out of it and she keep it in the safe. Took it out
22 and let them hold it.

23 Q Okay. Are you asking for alimony today?

24 A Yes, I am.

1 Q How much alimony are you requesting?

2 A A thousand dollars a month.

3 MR. ROBBINS: Okay. Pass the witness.

4 THE COURT: Thank you. Mr. Toti, so you're doing
5 both a direct and a cross at the same time?

6 MR. TOTI: That's correct, Judge.

7 CROSS EXAMINATION

8 BY MR. TOTI:

9 Q Mr. Williams, do you have a copy of your financial
10 disclosure form that you filed on February 4th?

11 A Yes.

12 Q I'm sorry, you have it in front of you, sir?

13 A Yes.

14 Q Oh, okay. Can you turn to page 2? Okay. At the
15 bottom of page 2 you indicate that your gross monthly income
16 is \$11,300.

17 A Yes.

18 Q Okay. If you can turn to page 4. You indicate that
19 your total monthly expenses are \$4,389?

20 A Yes.

21 Q Okay. Is it fair to say that your income exceeds
22 your monthly expenses each month?

23 A When I did it, I messed up on the added -- it's more
24 than that.

1 Q Okay. What have you forgotten?

2 A It says clothes and shoes. It says cell phone --
3 the cell phone bill is out. My condo is --

4 Q Take it one at a time, sir. You tell me what --
5 what's missing and how much.

6 A The truck that I still have that I'm making the
7 payments on, still owe on that truck, the 2004. The truck was
8 \$9,000. The 2004, the Chevy Silverado still making monthly
9 payments on.

10 Q Hold on, sir. Slow down. Are we talking about two
11 vehicles or just the '04 Silverado.

12 A The '04 Silverado.

13 Q Okay. How much do you pay on that?

14 A Pay 250 a month.

15 Q Okay. Do you have any proof of that?

16 A I don't have no proof on me righthand physical but I
17 don't have the title for the truck.

18 Q You realize today's the day of trial, right, sir?

19 A Yes.

20 Q Okay. I mean, you -- you've -- you've supplied over
21 50 exhibits to the Court. You didn't -- you didn't provide
22 your -- your truck payment?

23 A Because it's -- it's buy here and pay here. So that
24 don't go to a bank. You go to the one that you pay and when

1 you get your receipt.

2 Q Where is the receipt?

3 A At home.

4 Q Okay. And you didn't think to bring them.

5 A Because when I asked Debbie (ph), she said I didn't
6 need them. So I --

7 Q I don't know who Debbie is, sir. And you --

8 A Huh?

9 Q -- didn't think to bring -- I don't know who Debbie
10 is, sir, but you didn't think to bring them?

11 A No.

12 Q Okay. And you didn't think to write down that you
13 pay 250 a month either?

14 A That's why I said I forgot. I was rushing to do it.

15 Q Okay. Why were you in a hurry to do this?

16 A Because when we came, I had to get it back to her.

17 Q Okay.

18 A And when I did this paper, this is the recent one, I
19 had an emergency to leave Vegas, last Thursday I went home
20 because my father is sick and she wanted this paper done on
21 Wednesday before I left. So I was --

22 Q Okay.

23 A -- rushed to do it.

24 Q All right. So you forgot a \$250 car payment, right?

1 A Yes.

2 Q Okay. What else?

3 A My cell phone.

4 Q How much did you pay for that cell phone?

5 A A cell phone is 209 plus 140. So it's two -- it's
6 three phones for my sons, a phone apiece, and my cell phone is
7 20 -- 209 a month.

8 Q So how much do you pay a month total for cell
9 phones?

10 A 09 -- 140 -- 348.

11 Q 348 a month. And do you have any proof of that?

12 A Yeah, the bills is in my phone. The emails is in my
13 phone every time I pay.

14 Q Did you provide an exhibit that shows your phone
15 bill each month?

16 A No, I did not.

17 Q Why not?

18 A I just told you I had an emergency to go to New York
19 last Thursday. My father is very sick. And I --

20 Q I appreciate --

21 A -- was rushing --

22 Q I --

23 A -- so I can catch --

24 Q -- appreciate --

1 A -- my flight.

2 Q Okay. I appreciate that and I am sorry to hear
3 about your father and I understand that that is why you didn't
4 fill out this document properly, but I was asking you why you
5 didn't provide that as an exhibit.

6 A I don't know.

7 Q Okay. What other -- what other expenses did you
8 forget?

9 A Clothes.

10 Q Okay. How much?

11 A Different prices.

12 Q How much on average monthly do you pay for clothes,
13 sir?

14 A Probably \$300.

15 Q Okay. What else did you forget?

16 A The fuel for my trucks.

17 Q Okay.

18 A Gas.

19 Q Okay. How much?

20 A And that's five for a week -- one week is 550 in
21 gas.

22 Q Okay.

23 A It's a hundred dollars a day.

24 Q Okay. So 2,000 a month?

1 A Yes.

2 Q Okay. What else? Well, let me -- let me stop you.
3 I appreciate that you were rushing. You forgot that you pay
4 \$2,000 a month for gas? You forgot that?

5 A Yes.

6 Q Okay. What else did you forget?

7 A That's about it.

8 Q Okay. So you forgot about \$2900 a month in
9 additional debt, right?

10 A Yes.

11 Q Okay. And if you add that up and you add that to
12 the 4300, you're about 7,000 a month in debt, right?

13 A Yes.

14 Q Okay. Could you turn to page 5? At the bottom of
15 page 5, you indicate that you receive \$700 a month from your
16 mother-in-law who lives with you?

17 A Yes.

18 Q Okay. Could you turn to page 6? Are you on page 6,
19 sir?

20 A Yes, I am.

21 Q You didn't list a single asset. Why not?

22 A Because Nadine is the one that always had
23 everything. Everything is under her name.

24 Q Okay.

1 A So I don't have access to none of that.

2 Q Okay. So are you --

3 A So if I --

4 Q -- are you --

5 A -- wrote down something --

6 Q -- alleging that there's no assets?

7 A Huh?

8 Q Are you alleging that there's no assets?

9 A There's assets but she has everything. Everything
10 is under her name.

11 Q Okay. Well, let's back up. There is a 2015
12 Silverado truck, right?

13 A Yes.

14 Q Who has that truck?

15 A I have it.

16 Q Why didn't you list it?

17 A Because it's under her name.

18 Q Hold it, sir. You just said because she had
19 everything and now she doesn't have everything. Okay. Read
20 the -- if you can read the top, subsection A. Could you read
21 that sentence to me?

22 A Just complete the chart by listing all assets and
23 values from each account owned -- or each -- and whose name
24 (indiscernible) listed (indiscernible).

1 Q Okay. So why didn't you list the 2015 truck?

2 A No. No. I tell you I was rushing to --

3 Q Right.

4 A -- leave to catch my flight.

5 Q Right. I mean, do -- do you find this important at
6 all, sir?

7 A Yes, I do. Very --

8 Q Okay.

9 A -- important.

10 Q Okay. What about the 2004 Silverado? Why didn't
11 you list that?

12 A Same thing. I was rushing.

13 Q You rushed so much that you just neglected to fill
14 out this page at all?

15 MR. ROBBINS: Asked and answered.

16 THE COURT: Sustained. He hasn't filled it out.

17 MR. TOTI: Okay.

18 BY MR. TOTI:

19 Q All right. Let's fill it out together, sir. What
20 asset would you put at the top?

21 A The Silverado -- the Chevy Silverado 2015.

22 Q Okay. And how much is it worth?

23 A It's worth about 35 --

24 MR. ROBBINS: Calls for st -- calls for speculation.

1 MR. TOTI: If you know. I'm asking him what he
2 believes it's worth.

3 THE COURT: If he can --

4 THE WITNESS: Probably 20,000.

5 THE COURT: If he knows the answer. He -- I'm
6 sorry, what did you say?

7 THE WITNESS: 20,000.

8 THE COURT: 20,000? Okay.

9 BY MR. TOTI:

10 Q What's the answer, sir?

11 A 20,000.

12 Q 20,000. Okay. And is there any money owed on it?

13 A Don't know.

14 Q Okay. Did you hear Nadine testify earlier that she
15 made the last payment at the end of last year or the beginning
16 of this year? Oh, wait. Wait. March of last year. Did you
17 hear her make -- state -- make that statement?

18 A Yes.

19 Q Okay. Knowing that do you think there's any money
20 owed on it?

21 A No, there's no money owed on it now.

22 Q Okay. What about the '04 Silverado?

23 A It owes --

24 Q How much is it worth, sir?

1 A A thousand dollars left.
2 Q How much is it worth?
3 A A thousand dollars left.
4 Q How much is it worth, sir?
5 A That truck is worth probably about 3500 right now.
6 Q 3500? And how much is owed on it?
7 A A thousand.
8 Q Okay. Whose name is that truck in?
9 A My name. My name.
10 Q Okay. All right. What other vehicle, sir?
11 A That's it.
12 Q You don't have any other vehicles?
13 A No, I don't.
14 Q Okay. You don't --
15 A (Indiscernible) --
16 Q -- have a 2001 Chevrolet?
17 A Huh?
18 Q You don't have a -- a 2001?
19 A No, that -- that truck was sold when I was -- that
20 truck was sold when I was in New York and then collected the
21 money on that truck. That's before the divorce. The 2001
22 Chevy Silverado, Dee (ph) has that truck.
23 Q Okay. So you're denying --
24 A It's next door to us. Next door to us.

1 Q You're denying that that truck is in your
2 possession?

3 A The truck is not in my possession.

4 Q Okay. And where do you think it is?

5 A Dee has it.

6 Q Who has it?

7 A The next door neighbor. The black Chevy Silverado
8 was sold before the divorce happened.

9 Q Okay. I'm talking about a silver one. Do you
10 remember the silver Silverado, the silver Chevy?

11 A What, the 2015?

12 Q Okay. Well, let's start with that one. I'm talking
13 about other cars, sir. You've given me two cars so far. You
14 have more than two cars.

15 A I don't have no more cars.

16 Q This is it, just these two?

17 A Just these two.

18 Q Okay. All right. And you've indicated that you
19 want to keep the Chevy?

20 A Yes, sir.

21 Q And you want to keep the '04 Chevy as well?

22 A Yes, sir.

23 Q Okay. And so that's about -- per your estimation
24 that's about \$22,000 in equity between the two vehicles?

1 A Yes.

2 Q Okay. You're willing to give Nadine half of that
3 amount?

4 A No.

5 Q Why not?

6 A My hospital bill -- who's paying my hospital bill?

7 Q We'll get to your hospital bill in a minute, sir.

8 I'm asking you why aren't you willing to pay Nadine this
9 money?

10 MR. ROBBINS: Calls for a legal conclusion.

11 MR. TOTI: Legal conclusion?

12 THE COURT: He can ask if he's willing to give him
13 the equity. He's already said no though. He's already said
14 no. So --

15 MR. TOTI: Okay.

16 THE COURT: -- we'll accept that answer. He's not
17 willing to pay her half. Go ahead.

18 BY MR. TOTI:

19 Q So your -- your proposal is to keep both trucks --

20 MR. ROBBINS: Asked and answered.

21 Q -- and give Nadine nothing.

22 MR. TOTI: I'm just clarifying.

23 Q Is that correct, sir?

24 THE COURT: You can answer the question.

1 A I said already. I said no.

2 Q All right. All right. Well, let's talk about your
3 hospital bills. You just said who's going to pay them, right?

4 A Yes.

5 Q Okay. When's the last time you paid on them?

6 A I haven't.

7 Q So the answer is nobody, right? You haven't --

8 A (Indiscernible).

9 Q -- paid on them. You haven't paid on them?

10 A No.

11 Q And no one's ever come after you for them?

12 A No.

13 Q So what makes you think anybody's going to come
14 after him for you?

15 A Because when I tried to apply for something it comes
16 up on my credit.

17 Q Okay. Well, you having bad credit is a par -- isn't
18 the same thing as owing the money, right? Do you know if --

19 A I don't know.

20 Q -- they have been written off by any chance?

21 A No, they're not written off.

22 Q Are you receiving --

23 A (Indiscernible) --

24 Q -- monthly -- are you --

1 A I still get my bill.

2 Q -- receiving monthly statements?

3 A Huh?

4 Q Are you receiving monthly statements?

5 A The bill comes to my house.

6 Q Okay. Do you have a copy of it?

7 A The attorney have it. I sent it to Debbie.

8 Q Which exhibit is it?

9 MR. ROBBINS: I could -- there's multiple -- there
10 are multiple exhibits that have been entered regarding medical
11 bills -- the medical bills.

12 THE COURT: I did show it earlier, Mr. Toti. Hold
13 on. Let me see if I can find it.

14 MR. ROBBINS: The -- B, C, E, D --

15 THE COURT: If you can give me the page number.
16 Wasn't it --

17 MR. ROBBINS: So the -- the one issue is that I
18 believe at least one of the bill is duplicated but page -- I
19 -- page 1 -- 1 and 2 --

20 THE COURT: Oh, okay. Hold on. Page 1 and 2
21 (indiscernible).

22 MR. ROBBINS: But I believe that one's duplicated
23 later.

24 MR. TOTI: Let's just start with -- let's just start

1 with page 1 of Exhibit A. That's fine.

2 THE COURT: Okay. Hold on. I'm getting it.

3 MR. ROBBINS: The reason I --

4 THE COURT: I believe it's --

5 MR. ROBBINS: The reason --

6 THE COURT: -- here. Everyone --

7 MR. ROBBINS: Yeah.

8 THE COURT: -- has that?

9 MR. ROBBINS: So the reason I would say don't do
10 that is -- is because Exhibit I which starts on 15 contains
11 those pages and is more complete.

12 THE COURT: Let me get to page 15. Is this the
13 page? That's -- that's a separate page. That's page 15.

14 MR. ROBBINS: And then if you -- on page 17 is
15 another bill with Dignity Health.

16 THE COURT: Okay.

17 MR. TOTI: Okay. Judge, that's fine. Let's --
18 let's start on page 15 then if you don't mind.

19 THE COURT: All right.

20 MR. TOTI: Thank you, Your Honor.

21 THE COURT: There you go. It's on screen now.

22 BY MR. TOTI:

23 Q Mr. Williams -- Mr. Williams, this is your medical
24 bill?

1 A Yes.

2 Q Okay. It indicates that about \$7500 is owed?

3 A Yes.

4 Q In the middle, it says patient payment zero,
5 correct?

6 A Yes.

7 Q And it says total amount owed 7500, right?

8 A Yes, it does.

9 Q This statement is from March of 2019, correct?

10 A Yes. '18.

11 Q This is the most recent statement you have received?

12 A That's the last one.

13 Q You haven't received a bill in almost two years?

14 A That was the last one recent -- that is the last --
15 no, the other one that came I sent it to Debbie.

16 Q My -- sir, I'm asking you for this bill. You --
17 this shows that a statement date of March of '19 on this bill
18 -- this is a bill you have provided the Court. I'm asking you
19 have you received a more recent one?

20 A No.

21 Q Okay. So you haven't received a statement in more
22 than two years. Is it possible sir that they've quite coming
23 after you for this money?

24 A Don't know. I still get the bill. The last bill I

1 got was last year. This year -- last year.

2 Q I'm -- I'm asking you again sir because you just
3 said that this is the most recent statement. Let's -- let's
4 turn to page 17 then. This statement is from April of '19 sir
5 which is still about two years ago. Do you have any more
6 recent statement than this?

7 A No, that's the last one. That was the last one that
8 came.

9 Q All right. So is it possible that they've stopped
10 coming after you if you haven't received a bill in more than
11 two years?

12 A Don't know. I haven't received no bill. I --

13 Q I said is it possible, sir? Is it possible?

14 A They might have.

15 Q Okay. All right. So you had indicated that at
16 least it seemed to me that when you said that you weren't
17 going to give Nadine -- Nadine any money for the trucks it was
18 because who was going to pay your medical bills. Wasn't that
19 your statement?

20 A Yes, sir.

21 Q It doesn't sound like any money is owed on the
22 medical bills, does it?

23 A So who paid them off?

24 Q It's not my question, sir. It doesn't look like

1 there's any money owed, is there?

2 A Money owed somewhere down the line.

3 Q But they're not coming after you for it, are they?

4 A I don't know.

5 Q Okay. So is it still your testimony that Nadine
6 doesn't deserve any of the -- of the equity that's in the
7 trucks?

8 A No.

9 Q Is that a no you don't agree or yes she does -- she
10 -- she should get it?

11 A No, she shouldn't get it.

12 Q Okay. All right. You heard Nadine's testimony
13 regarding the -- the debt consolidation, didn't you?

14 A Yes, I did.

15 Q Okay. Are you willing to pay half of that
16 consolidation debt?

17 A If -- if that machine comes back to Jamaica, yes.

18 Q Okay. So the machine from Jamaica, tell me about
19 the machine from Jamaica, what you know of it.

20 A She ordered it. She asked me -- when I got back
21 down here in 2019 she asked me do I have any money. Yes, I
22 do. I gave her 6,000 to put in her account so she can get
23 that machine sent to the house. It came to the house, it got
24 shipped to Jamaica. When I asked her about the machine --

1 when I asked about my money, she says the machine ain't up and
2 running yet. So if I got to pay any -- any of the bills, I
3 need ha -- I need that machine brought back to -- brought back
4 to Vegas with the tools that I purchased and got sent out to
5 Jamaica and then I pay half.

6 Q All right. And earlier the testimony from Nadine
7 was is that the machine is a lease and it -- it -- there's no
8 value to it. Did you hear that testimony?

9 A Machine is a value to it because it's not supposed
10 to leave the state of Vegas.

11 Q The -- I don't understand what the state of Vegas
12 is, sir.

13 A The machine -- when the bank came to verify the
14 house, she was at work. I was there. They came to check to
15 make sure the machine was delivered to the house and it's
16 supposed to be in the house. After they checked and verified
17 it, the machine was shipped off to Jamaica. The -- the
18 machine was making money. It was up and running because every
19 month she was going to Jamaica, bringing stuff down for that
20 machine --

21 Q Okay.

22 A -- before she threw me out the house.

23 Q Okay. But I -- okay. Well, let -- let me try the
24 question a different way, sir. How much is the machine worth?

1 A It's worth \$34,000.

2 Q \$34,000? And how much is owed on the machine?

3 A I don't know. Because she kept everything in a dark
4 secret like everything else.

5 Q You have no documentation regarding this machine?

6 A Only got where -- I -- I only got where it came from
7 and where it got shipped to.

8 Q Okay. And it's Nadine's testimony that it's a lease
9 and it has no value. You heard that testimony?

10 A Yes, I heard -- I heard that testimony.

11 Q Are you saying that that's incorrect?

12 A Yes, I -- yes, sir.

13 Q But you have no proof otherwise, correct?

14 A I have the proof where the machine came from and
15 where it went to.

16 Q I'm asking you if you have proof that the machine is
17 not being leased.

18 A No, I don't.

19 Q Okay. All right. And so it's your -- so -- and
20 just so -- just for clarification, you said that if the
21 machine comes back to Las Vegas you'll pay half the debt
22 consolidation loan.

23 A Yes.

24 Q Okay. That's the only requirement sir, that the

1 machine physically be in Las Vegas?

2 A Yeah.

3 Q You don't want anything (indiscernible)?

4 A And the rest -- and the rest of the tools.

5 Q Okay. Well, let -- let's talk about the tools then.

6 Nadine indicated that you guys have purchased about somewhere
7 between 10 and \$15,000 worth of tools over the course of your
8 marriage. Do you agree with that?

9 A Yes, sir.

10 Q Okay. Is -- is Nadine entitled to half the tools?

11 A The compressor was sold in New York. The frame
12 machine was sold down here. She got half of the money for
13 that.

14 Q Okay.

15 A The (indiscernible) was paid for. It got thrown
16 away because we aren't having that.

17 Q Sir, I'm not talking about tools that you previously
18 had, sir. I'm talking about tools you currently have.

19 A Those tools is not hers.

20 Q Why not?

21 A They're not hers. For the tools --

22 Q How --

23 A -- that I bought, the tools that we bought, they're
24 gone, in the garbage.

1 Q They're all gone in the garbage.

2 A Yes, sir.

3 Q Okay. When did you throw them away?

4 A They've been got thrown away from New York.

5 Q Okay.

6 A I've been buying tools down here to work on my cars.

7 Q Okay. When did you last buy a tool?

8 A Probably say two months ago.

9 Q Okay. Do you realize that you've paid for that with
10 half of Nadine's money?

11 A No.

12 Q Okay. Community property law, sir. Every dollar
13 you make is half my client's. so if you spend my client's
14 money on -- on a tool, she gets half of it. So you bought a
15 tool about two months ago. What tool was it?

16 A It was a bearing presser -- ball joint presser to
17 fix the silver truck.

18 Q Okay. Which silver truck, sir?

19 A The 2015.

20 Q Okay. All right. The presser. How much did you
21 pay for the presser?

22 A A hundred and nine dollars.

23 Q Okay. You willing to give Nadine \$55 and you can
24 keep the presser?

1 A No.

2 Q No?

3 A No.

4 Q Okay. All right. What other tools have you bought?

5 A Screwdrivers, pliers, cutting pliers, jacks.

6 Q This would have been a good thing to write down on
7 this asset chart. You realize that, right?

8 MR. ROBBINS: Argumentative.

9 THE COURT: I'm sorry, was there an objection in
10 there?

11 MR. ROBBINS: All right. Objection, it's
12 argumentative.

13 THE COURT: It's asked and answered. He had already
14 admitted he did not write everything down.

15 BY MR. TOTI:

16 Q Sir, are you willing to provide me a full list of
17 all of the tools you have purchased and are in your
18 possession?

19 A No.

20 Q Why not?

21 A Because when I asked for my stuff it never came back
22 to me.

23 Q All right. Well, then we'll keep going. You
24 mentioned all the other tool -- what other tools have you

1 purchased, sir?

2 A The scaffold that she has in her house.

3 Q I'm talking about po -- tools in your possession,
4 sir.

5 A Lockout kits, chains.

6 Q Okay. What else?

7 A Air guns.

8 Q Anything else?

9 A No, that's it.

10 Q Okay. What do you estimate you've paid for all
11 those items, sir?

12 A Less than a thousand dollars.

13 Q Okay. Sir, the first question that your attorney
14 had for you asked you about the boys in the case. Your
15 testimony was that you wanted full custody of the boys; is
16 that correct?

17 A Yes, sir.

18 Q What does full custody mean to you, sir?

19 A I have them.

20 Q What does -- what does that mean?

21 A That I be in charge of them.

22 Q Okay. So -- so in -- in what regard that you would
23 be in charge of them?

24 A Like I've been doing, taking care of them, make sure

1 they go to school, make sure they got a bed to sleep in, make
2 sure they got clothes on their back.

3 Q Okay. That's what you -- that's your definition of
4 full custody?

5 A Yes.

6 Q Okay. What about decisions regarding the children,
7 like -- like where they go to school or -- or non-emergency
8 medical decisions or extracurricular activity decisions? What
9 about decisions like that?

10 A Well, before -- her testimony said she would like to
11 help place them in the school. I'm not denying that. She can
12 if she want to up by my house. Herman's raised in a charter
13 school. The other two boys I couldn't get them in last year
14 but they would get in this year.

15 Q Okay. Well, let's take that one at a time. Are you
16 saying that you do not have an objection to the children going
17 to Doral Academy?

18 A No, I don't have no objection -- no objection that
19 they're not supposed to go there.

20 Q I'm sorry, that might have been a double negative,
21 sir. You're agreeing that the kids can go to Doral Academy?

22 A Yes.

23 Q Okay. All right. Now with regards to other
24 decisions regarding the children, are you stating that you

1 should make those decisions alone or you and Nadine make --
2 need to make those decisions together?

3 A We can make it together on the app.

4 Q Okay. All right. Well -- well, let's talk about
5 that. You said you got your phone for Christmas?

6 A Yes.

7 Q Why didn't you let anybody know you got a phone
8 where you can start communicating with my client prior to just
9 now today?

10 A Because when she -- I don't know. I don't know. I
11 don't know.

12 Q Okay. All right. I mean, you're willing to
13 communicate with her is -- is your testimony, right?

14 A Yes, sir.

15 Q But you haven't been up until now, right?

16 A Huh?

17 Q You haven't been willing to communicate with her up
18 until now, correct?

19 A She could -- she had many times to communicate me.
20 My house phone number never changed.

21 Q Sir, the court order was that you communicate
22 through the parenting app. Why didn't you just do that?

23 A She denied my request from court from the last time
24 we was in court December. When the Judge told me to put it on

1 my phone then, she had to set me. I was paying the \$5 every
2 month coming out of the bill until the phone got taken away by
3 Abigail. I just recently got this phone and willing to put it
4 back on this phone.

5 Q So it's your now testimony that at one point you did
6 put the app on your phone?

7 A Yes, sir.

8 Q Okay. Did you ever tell your attorney that?

9 A Yes, sir.

10 Q Okay. All right. Would it surprise -- well, strike
11 that. So -- so it's on your phone now. What I'm going to do
12 -- have you --

13 A No, it's not. I didn't say it was on my phone.

14 Q Okay.

15 A I didn't say it was on my phone. I said I'm willing
16 to put it back on my phone.

17 Q All right. So we're going to resolve this right
18 now. Fabulous. Which parenting app sir would you like to
19 use? Your pick.

20 A Talking Parents.

21 Q Okay. And I'm going to have my client sign up for
22 Talking Parents and I would ask that you do the same after
23 trial today, okay? Do you --

24 A Okay.

1 Q -- have any objection?

2 A No, sir.

3 Q Okay. Very good. Now, you had testified that
4 Nadine should be able to see the kids every other weekend
5 Friday at 5:00 until Sunday at 8:00.

6 A Yes, sir.

7 Q Why every other weekend?

8 A Because I want a weekend for myself too.

9 Q Okay. Well, a weekend would be one, right? So why
10 are you asking for only every other weekend?

11 A Because I work during the weekdays. They're in
12 school. I can't take them and take them to the park on Monday
13 or Tuesday. It have to be on the weekend.

14 Q Okay. Well, what about Nadine having some time with
15 the kids during the week then and then you guys can split the
16 weekends?

17 A No.

18 Q Why not? Why shouldn't Nadine have the kids on the
19 weekends, sir?

20 A I mean, the week --

21 Q On -- during the school -- during the school week,
22 sir, why shouldn't Nadine have the kids?

23 A No.

24 Q I appreciate the answer is no, sir. I'm asking you

1 why the answer is no.

2 A Because she torment them. They're physically
3 abused.

4 Q She torments them?

5 A Yes.

6 Q How?

7 A With physical and -- abuse right now.

8 Q Okay. You testified a minute ago that you've never
9 seen Nadine physically harm the kids. That was your testimony
10 just a little while ago. What have you witnessed since you
11 said that a few minutes ago that it's now made you change your
12 mind?

13 A I didn't say --

14 MR. ROBBINS: Object, misstates the testimony.

15 THE COURT: His testimony speaks for himself -- for
16 his self. The Court will give it proper weight. Go ahead,
17 Mr. Toti. That'll be sustained.

18 BY MR. TOTI:

19 Q So sir, is that still your testimony that Nadine
20 shouldn't have visitation with the kids during the school week
21 because she torments them?

22 A Yes.

23 Q Okay. All right. Now, you indicated that you want
24 a relationship with Abby, correct?

1 A Yes.

2 Q Okay. And you testified that in fact her -- to
3 confirm Nadine's testimony that there are many times when Abby
4 comes to the exchange, correct?

5 A Yes.

6 Q And yet you don't go to your daughter to talk to
7 her?

8 A Court papers back in December --

9 Q Is that a yes or a no, sir? Do you go to the car to
10 talk to her?

11 A No, I don't.

12 Q Okay. Also the Court ordered that you and Abby can
13 do reunification counseling with Donna Gosnell. Do you
14 remember that order?

15 A Yes, sir.

16 Q Have you done anything to establish or to start the
17 therapeutic reunification with your daughter?

18 A Went there -- went there like at the court, finally
19 got a hold of Ms. Gosnell. Ms. Nadine Williams gave her my
20 wrong email. When the lady called Nadine, she told the lady
21 that she no longer needs it because she got custody of her
22 daughter. So what that tells me, it blocks me out.

23 Q Sir, I think you're confusing the time when the
24 Court ordered Nadine to go to -- do counseling with the

1 children. I'm talking about the order in December of 2019
2 where the Court ordered you to go do therapeutic counseling
3 with your daughter, Abby. Not all the kids, just Abby.
4 That's the only one we're talking about. You're confusing the
5 two times. I am asking you since that time sir have you
6 attempted to establish the reunification counseling with Abby?

7 Sir?

8 A I've tried.

9 Q How? What did you do?

10 A I went to Gosnell to sign with her. Nadine told the
11 lady she has a -- so it blocks me out. They blocked me out
12 from there.

13 Q Okay. When was this, sir? When did that happen?

14 A In December right after court, the week right after
15 court.

16 Q Okay. And was this ever brought to anybody's
17 attention?

18 A I told -- I told Debbie. I told Debbie.

19 Q Okay. So -- so why haven't you tried to sign up
20 with Donna again? Why didn't you go the next week? Why
21 didn't you go yesterday? Why didn't you go --

22 A Because I didn't have --

23 Q -- the day before?

24 A Because the deal was she's supposed to drop Abigail

1 to me on Fridays just like I drop the boys to her on Friday.

2 So you're --

3 Q I'm asking you --

4 A -- blocking me out.

5 Q I'm asking you sir about the reunification
6 counseling with your daughter. Why haven't you tried to set
7 up the reunification with your daughter with your -- again?

8 A How? How can I?

9 Q Sorry, say that again, sir?

10 A How can I?

11 Q How can you? How --

12 A Yes.

13 Q -- did you try the first time?

14 A I had -- I had no -- no object of getting Abigail to
15 even go. So how? I haven't seen Abigail in a whole year.

16 How?

17 Q You haven't seen your daughter in a whole year and
18 your efforts to try to see her was a year ago to go to Donna
19 Gosnell's office one time. That's your testimony?

20 A Yes.

21 Q Okay. incident that you talked about wherein my
22 client blocked your car -- or blocked the access to the
23 apartment complex, Elisha was sick all week home from school.

24 A Yes.

1 Q Correct?

2 A Yes.

3 Q And you didn't let my client know that, did you?

4 A She knew. I told them.

5 Q How?

6 A I told them. By phone.

7 Q How?

8 A By --

9 Q By --

10 A -- phone.

11 Q Okay. And -- and did you tell her what was wrong

12 with him?

13 A No, I did not because I'm not a doctor. I took him

14 to the -- I took him to the doctor and he had an ear

15 infection.

16 Q Okay. What -- what day of the week did you take the

17 child to the doctor that week?

18 A Monday right after school when they told me -- when

19 they called me to pick him up from school Monday.

20 Q Okay.

21 A That's when she dropped him to school. I had to go

22 pick him up.

23 Q All right. And he was home all week?

24 A He was home all week.

1 Q Okay. And then Friday comes. And Nadine is coming
2 to pick up the child, right?

3 A He -- she wasn't supposed to come to my house.
4 She's supposed to be at the school picking up the other two
5 boys.

6 Q Right. But -- but that's because Elisha wasn't
7 there.

8 A The boys wasn't out of school yet. Well, she was at
9 my house harassing me about Elisha. The boys wasn't out of
10 school yet.

11 Q Okay. Where was Elisha? Was he at your house or
12 was he at school?

13 A He's upstairs in the bed asleep.

14 Q Okay. And you wouldn't give her Elisha.

15 A No.

16 Q Why not?

17 A Because he had the ear infection?

18 Q So what? Why not? Why didn't you follow the court
19 order and give her Elisha?

20 A Because he was --

21 MR. ROBBINS: Obje --

22 A -- sick.

23 MR. ROBBINS: Objection, asked and answered.

24 THE COURT: All right.

1 BY MR. TOTI:

2 Q Nadine's a --

3 THE COURT: Yeah (indiscernible).

4 Q Nadine's a nurse, right?

5 A She's a -- not that type of nurse. Not for kids.

6 Q The -- she's not capable of taking care of a child?

7 A Not a nurse for kids.

8 Q Is your testimony sir that she's not taking --
9 capable of taking care of a child?

10 A She's not a nurse for kids.

11 Q I appreciate that, sir. I'm asking you is it your
12 testimony that Nadine is not capable of taking care of a
13 child?

14 A He's not -- she's not a -- a kids' doctor.

15 Q Sir, we can do this all day.

16 THE COURT: No, we can't.

17 Q My question to you.

18 THE COURT: You got 10 minutes.

19 Q We can do this until 12:45.

20 MR. ROBBINS: And Your Honor, I -- I do have another
21 witness. I was fairly quick with mine.

22 THE COURT: We're going to -- I'll talk to you about
23 an offer of proof of your next witness. But Mr. Toti, go
24 ahead. At this point, we are getting repetitive.

1 MR. TOTI: Understood, Judge. Let me just see if
2 there's anything else.

3 Q Sir -- and I apologize. The -- the tax debt that
4 you mentioned for the cars in -- in Connecticut, you've seen
5 the exhibit, right? Did you see that document, sir?

6 A I barely seen it. Put it back up there and let me
7 see it again.

8 THE COURT: Okay. Mr. Toti, go ahead and ask your
9 next question.

10 MR. TOTI: Okay. Judge, I'll just leave it at that.

11 THE COURT: Excuse me?

12 MR. TOTI: I'll -- I'll pass the witness, Judge.

13 That's --

14 THE COURT: Okay.

15 MR. TOTI: -- fine.

16 THE COURT: Thank you. Any -- anything else
17 briefly?

18 MR. ROBBINS: Yes.

19 REDIRECT EXAMINATION

20 BY MR. ROBBINS:

21 Q Herman, do you make \$11,000 a month?

22 A No, I don't.

23 Q Was that a mistake --

24 A Yes.

1 Q -- on the bottom of page 2 on your financial
2 disclosure form?

3 A Yes, it was.

4 Q Do you make approximately 5,666.66 a month?

5 A Yes.

6 Q Okay. Can you -- I'm going to direct you to Bates
7 Number 303 --

8 THE COURT: Okay. I'm sorry --

9 Q -- which is --

10 THE COURT: I'm sorry, Mr. Robbins. I don't have
11 acc -- I mean, do way you did --

12 MR. ROBBINS: It's --

13 THE COURT: -- your exhibits --

14 MR. ROBBINS: -- JJ --

15 THE COURT: -- it's extremely difficult.

16 MR. ROBBINS: -- JJ -- I'm sorry --

17 THE COURT: It's extremely difficult because you've
18 did them in batches of hundreds. So what -- what page are you
19 looking for?

20 MR. ROBBINS: Oh, it's 303.

21 THE COURT: And Mr. Robbins, I will direct you, you
22 have 15 minutes left.

23 MR. ROBBINS: Okay.

24 Q Okay. So starting on 303, what -- what is this

1 document?

2 A My bank statement.

3 Q And do your -- had -- do your payments from towing
4 trucks go directly into this bank statement --

5 A Every Friday morning.

6 Q -- to this bank account?

7 A Every Friday morning.

8 Q Okay. Can I turn to page 304? And do you see on
9 February 7th there was an automatic deposit? How much was
10 that for?

11 A 11 -- \$1,102 -- \$12.

12 Q \$12. Is that your weekly earnings for that week of
13 February 2020?

14 A Yes, it is.

15 Q Okay. And can we go to the next page, 305? On
16 2/14, did you get paid?

17 A Yes.

18 Q And how much did you get paid on 2/14?

19 A \$1,228.

20 Q Okay. And can you look on the bottom on 2/21 if we
21 scroll down a little bit? 2/21, how much did you receive?

22 A \$1,758.

23 Q Okay. So the -- are these very typical earnings per
24 week --

1 A

2 Q -- between 1100 maybe and 1700 or so, is that
3 typical?

4 A They go up and down.

5 Q Okay. (Indiscernible) from the 2015 Chevy
6 Silverado?

7 A 209,000 miles.

8 Q Did you do any type of research before today as to
9 the value of that truck?

10 A No.

11 Q And so the 20,000 number that you put out, do you
12 have any way to verify that?

13 A No, it was just roughly off my head.

14 Q Okay. What about the 2004 Silverado? How many
15 miles are on that truck?

16 A That got 300 and -- no, it's got 2 -- no, that's
17 304, 304,000 miles on that truck.

18 Q Okay. There was mention about tools purchases. The
19 tools that you purchased, what -- what was the benefit of
20 those tools? What did you use them for?

21 A To fix the trucks. Sometimes you need to jack -- to
22 jack up a car to change a tire so I can tow it.

23 Q Okay. So it that for your business?

24 A Yes.

1 MR. ROBBINS: Okay. I have nothing further.

2 THE COURT: Thank you. All right. No redirect
3 (sic), correct, Mr. Toti? Oh, you're on mute, Mr. Toti.

4 MR. TOTI: No, Judge.

5 THE COURT: Okay. Thank you. All right. And Mr.
6 Robbins, who is your last witness that you're proposing at
7 this time?

8 MR. ROBBINS: Phyllis Gayle.

9 THE COURT: And who is she?

10 MR. ROBBINS: She is the Plaintiff's mother.

11 THE COURT: All right. So I'm assuming it will not
12 be anything that is cumulative. You're going to be limited to
13 non-cumulative testimony.

14 MR. ROBBINS: Okay. I'll go grab her.

15 THE COURT: All right. Ma'am, raise your right arm.

16 THE CLERK: Raise your right arm, please. You do
17 solemnly swear that the testimony you're about to give in this
18 action shall be the truth, the whole truth, and nothing but
19 the truth, so help you God?

20 THE WITNESS: Yes.

21 THE COURT: Thank you. Please proceed.

22 MR. ROBBINS: Can you please.

23 THE CLERK: I can't -- we can't hear her on this
24 end, Judge. I didn't hear a yes.

1 THE COURT: Okay. She's going to need to speak
2 louder. Okay. Go ahead.

3 PHYLLIS GAYLE
4 called as a witness on behalf of the Defendant, having been
5 first duly sworn, testified upon her oath as follows on:

6 DIRECT EXAMINATION

7 BY MR. ROBBINS:

8 Q Can you please state your name and spell it for
9 the record?

10 A Phyllis Gayle, P-h-y-l-l-i-s, G-a-y-l-e.

11 THE COURT: Okay. And --

12 MR. ROBBINS: Are you able to hear?

13 THE COURT: -- she's going to talk a little -- she's
14 going to need to speak a little bit louder. So --

15 MR. ROBBINS: Let me --

16 THE COURT: -- please have her speak louder and go
17 ahead.

18 MR. ROBBINS: Sure, and I can -- I can move the
19 speaker a little bit closer as well.

20 THE COURT: That -- that would be lovely. Plea --
21 please proceed.

22 MR. ROBBINS: Okay.

23 Q Can you state your -- do you have a relationship
24 with the parties here today, Herman and Nadine?

1 A Yes, I do.

2 Q What is your relationship to the parties?

3 THE CLERK: I'm sorry, Judge, we --

4 THE COURT: We --

5 THE CLERK: -- we can't hear her.

6 THE COURT: -- can't hear anything.

7 MR. ROBBINS: Okay. Some sit closer.

8 THE COURT: Sorry, maybe you can trade her spots.

9 MR. ROBBINS: I'm going to have her sit real close.

10 THE COURT: Thank you. Okay. Go ahead.

11 MR. ROBBINS: Okay.

12 Q What is your relationship to the parties?

13 A Nadine's mom and Herman's mother-in-law.

14 Q Okay.

15 A And the kids' grandma.

16 Q Have you resided with Herman and Nadine before?

17 A In Connecticut.

18 Q When did you first come to reside with the parties?

19 A In 2013, April 2013.

20 Q Okay. And then did you move to Las Vegas when they

21 moved?

22 A Yes, I did.

23 Q Okay. And did you continue to live with the

24 parties?

1 A Yes.

2 Q And who do you currently live with?

3 A I'm living with Herman.

4 Q Okay.

5 A Herman's.

6 Q When did you move in with Herman?

7 A I think it was 2019. What is -- (indiscernible)?

8 Q And what is the -- what is the reason that you
9 currently live with Herman?

10 A Because Nadine, she abuse me. We had a fight. She
11 attacked me and she gave me notice to leave the house.

12 Q When you say she attacked you, what do you mean?

13 A Physically abuse me. She fought me. She --

14 Q Okay.

15 A -- grabbed me in my throat here and pulled me here
16 and there and outside the door. And then she pulled me back
17 inside when I cried out and called for help. She pulled me
18 back inside because the kids were screaming and her boyfriend
19 was there looking on. She took him to go outside, stay out
20 there, and let me deal with her case inside the house. But
21 because the kids were screaming, she took me to the -- to the
22 garage. And when I -- while I was screaming she took me back
23 inside and while pulling me back through the door I hurt my
24 arm by the tugging and then when she came back inside she

1 shove me in my face and I fell in the chair.

2 Q Okay. What -- do you know what month and year this
3 occurred?

4 A I think it was, what, February. It was February
5 2019.

6 Q Okay. And the children were present during this
7 incident?

8 A Yes, the small kids were present. Abigail, she came
9 when the -- when she took me back inside and pushed me back on
10 -- in my face in the chair.

11 Q Okay. Did you call the police?

12 A Yes, I did.

13 Q Did the police -- did -- was there any report taken?

14 A Yes, the report was taken which I didn't follow
15 because of what the police said to me.

16 Q Okay. Have you ever witnessed Nadine being physical
17 with the children?

18 A Yes, I saw -- well, it happened on more -- on one on
19 -- well, more than one occasions, but the one that stand out
20 was with Abigail --

21 Q And --

22 A -- when she used that pipe, PVC --

23 Q -- when -- when was that occasion?

24 A Can I recall the -- I --

1 Q I don't want you to guess. So if you can
2 approximate, maybe.

3 A It was -- oh, it was probably the 2018. I think it
4 was 2018. Yeah.

5 Q Okay.

6 A Yeah.

7 Q And you saw Nadine physically strike Abigail?

8 A Yes, I did.

9 Q And what did she strike her with?

10 A It was a piece of PVC pipe.

11 Q And where did she hit her?

12 A Well, she was hitting her all over and then finally
13 I don't know if Abigail shift or what, but it hit her in her
14 forehead.

15 Q And was Abigail bleeding?

16 A Yes, she was bleeding.

17 Q Was there medical attention needed?

18 A Well, she herself provided medical attention.

19 Q When you say she, who do you mean?

20 A Nadine. Nadine.

21 Q Nadine --

22 A Yeah.

23 Q -- provided it?

24 A She -- she put a -- clean it up with a compress on

1 it and I think she put the band-aid or something to cover it.

2 Q Okay. How soon after that incident did you move out
3 of the house?

4 A With -- which of not -- the --

5 Q That -- that incident where she had hit Abigail.

6 A No, it was -- it wasn't anytime soon. It was the
7 following year after when she attacked me.

8 Q Okay.

9 A Yeah.

10 Q Did you tell Herman about that incident when she hit
11 Abigail?

12 A No, I didn't because --

13 Q Okay.

14 A -- well --

15 Q Why didn't you tell Herman?

16 A Well, he was informed already because Abigail
17 herself called Dad and grandma to tell her -- tell them.

18 Q Okay. Did you hear Abigail make that phone call?

19 A No, I didn't.

20 Q Okay. Have you ever seen Nadine hit the boys?

21 A I -- I saw with -- that's the June -- Herman III.
22 Yes, she hit him at one point where a report came home from
23 school that he was watching something indecent on laptop at
24 school. And she (indiscernible) and she went to the school.

1 She flogged him there at the school and then when she came
2 home flogged him again.

3 Q When you flogged, what does that mean?

4 A I mean --

5 Q What does that mean?

6 A -- with a piece of -- one of those -- whatever that
7 black piece of rubber.

8 Q Do you know what was?

9 A I think that rubber -- it came from that window, was
10 returned by that -- from the window. Okay. I think --

11 Q And so did she like whip him with it?

12 A Yes, she -- use it to hit him over his body.

13 Q Okay. Do you know if it left any marks?

14 A It wasn't any bruises, but there were like welts on

15 --

16 Q Welts?

17 A Welts like you're -- marks, like welts on his skin,

18 but --

19 Q Okay.

20 A -- yeah, not (indiscernible).

21 Q Did you call police at any time?

22 A No, I did not.

23 Q Did you call any CPS or anything?

24 A No. No. No.

1 Q Okay. Have you witnessed other incidents of
2 violence from Nadine that you've seen --

3 A Well --

4 Q -- personally?

5 A Well, there was -- yeah, there was one incident
6 where we had gone on a cruise and the kids were -- she
7 instructed the kids to -- she took them to the games room and
8 she told them that -- I was babysitting the little one,
9 Elisha. And she took them to the games room and after they
10 played -- they had the games she told them to find a way back
11 to the -- to the cabin which they probably got lost and went
12 off on a different route and they -- I don't know if the
13 reception area saw them roaming around and they called on the
14 intercom that they were missing. So she then came, search for
15 them, and took them to -- to their room and she flogged -- at
16 the time, it was her niece which was -- which is Leah (ph).
17 And Abigail and Herman III.

18 Q You have all three of them?

19 A The -- all three of them got beaten. And at the
20 time, the cabin -- the next door to her -- to -- to us they
21 heard the commotion and they were knocking on the door, you
22 know, for her to stop and she yelled at them and said leave
23 her effing whatever, whatever, because --

24 Q Okay.

1 A -- it's her kids so she scold them as she wants to.

2 Q Okay. Do you believe that the children are safe to
3 be in Nadine's care for extended periods of time?

4 A I wouldn't think so.

5 Q Okay.

6 A I wouldn't think so.

7 MR. ROBBINS: I pass the witness.

8 THE COURT: Mr. Toti?

9 MR. TOTI: I'll be very brief, Judge.

10 THE COURT: Thank you.

11 CROSS EXAMINATION

12 BY MR. TOTI:

13 Q Ma'am, how many times have you called the police as
14 a result of what you've witnessed?

15 A I've never called them pertaining to the beating.

16 Q Okay.

17 A But --

18 Q Thank you.

19 A -- she's -- yeah.

20 Q That's your -- thank you, ma'am. And ma'am, I -- I
21 realize that different people use different words for
22 different things. You -- you have specifically been saying
23 the word flogging. Could you please describing to the court
24 what a flogging is?

1 A Well, she used the strap to beat them.

2 Q Okay.

3 A To hit them.

4 Q All right. And -- and so -- so you are saying that
5 when she struck the children with a belt per your testimony,
6 that's what you're calling a flogging?

7 A Yes.

8 Q Okay. And how many times did you estimate that
9 she's done that?

10 A Well, I can recall on two -- on two occasions, yes,
11 I -- I witnessed those.

12 Q On two occasions. And yet you never called the
13 police.

14 A One, two -- three, on three occasions.

15 Q Three occasions. And you never called the police.

16 A No, I didn't.

17 Q Okay. Did you ever have communication with my
18 client regarding what she was doing?

19 A Well, when I spoke to her, well, she's a bit
20 aggressive. So I really didn't, you know, trouble her as
21 such.

22 Q Okay. You're currently living with Mr. Williams,
23 correct?

24 A Yes, I am.

1 Q Okay. Did he ask you to testify today?

2 A No, he didn't.

3 Q Okay. Are you lying to -- to help out his -- his
4 case today?

5 A I'm not, because --

6 Q Okay.

7 A -- I was -- yeah.

8 Q You're -- you're relying upon him for -- for a -- a
9 roof over your head, correct?

10 A No, I'm not.

11 Q No? Okay.

12 A I pay rent.

13 Q Okay. You're paying about 700 a month?

14 A Yes, I got help. Yes.

15 Q How much are you paying a month, ma'am?

16 A That's 700.

17 Q Seven hundred. Okay. All right. Thank you, ma'am.
18 Nothing further, okay?

19 A All right. Thank you.

20 THE COURT: Thank you. All right. Anything else,
21 Mr. Robbins?

22 MR. ROBBINS: No.

23 THE COURT: Okay. Just to make sure, everyone, we
24 do have the children's interview. I know that was sent to

1 both of you as well from FMC. So everyone's aware of that as
2 well?

3 MR. TOTI: Yes, Judge.

4 THE COURT: As far as anything else, well, it's
5 12:42. So Mr. Toti, you can have a two minute closing
6 followed by Mr. Robbins if you so choose.

7 MR. TOTI: I will be very quick, Judge. Judge, what
8 we have is very simple. I will -- I will make it as brief as
9 possible. The parties have agreed and stipulated that Mom
10 will have primary physical custody of Abby. Per Mom's
11 testimony, Dad's visits should be limited to the reunification
12 counseling and then thereafter the parties can have some type
13 of a set schedule depending on how the reunification
14 counseling goes. Dad obviously should be ordered to pay for
15 all of the counseling. Judge, Mom is asking for primary
16 physical custody of the other three children as well.

17 The pretrial memorandum and the -- and the testimony
18 that you've heard today speaks for itself. Look at the
19 factors, Judge. Judge, in -- in listening to Mr. Williams'
20 testimony, it sounds as if he would be unable to cooperate and
21 communicate with anyone, let alone Nadine, to help co-parent
22 and assist with the children. It should be primary physical
23 custody to Nadine, Judge; however, if for some reason the
24 Court believes that joint physical custody is a better

1 arrangement and giving Mr. Williams the benefit of the doubt
2 at this time, then Mom would ask for a week on week off
3 schedule which would to be occurred Friday after school. That
4 way there would be as little contact between the parties as
5 possible.

6 Judge, as agreed and stipulated by the parties, the
7 kids will go to the Doral school for the 21-22 school year.
8 So we ask that that be an order of the Court. Judge, if Mom
9 is granted primary physical custody of all the children,
10 Herman should pay 20 -- 28 percent of his gross monthly income
11 to Mom. If Mom only has primary physical custody of Abby and
12 joint of the other three, then it should be 16 percent of
13 Herman's gross monthly income to Mom and then a 26 percent
14 calculation both ways due to the joint schedule based upon NAC
15 425.

16 However Judge, as to Defendant's income, it's all
17 over the place. I would point to the FDF. Judge, he set
18 forth that he makes \$11,000 a month. You've heard testimony
19 from my client indicating that he has the ability to set his
20 own income and make as much income as he wants. She had
21 testified that she's earned more money throughout the years
22 than he is reporting -- or testified to today which believes
23 again his financial disclosure form. We would ask the Court
24 that either set his income at the 11,000 that he put down or

1 that the Court finds that he's intentionally under employed
2 pursuant to Miniar (ph).

3 Judge, the assets need to be divided and -- and
4 taken care of. There are trucks. If they're going to be
5 awarded to Herman, then -- then they need to be valued and my
6 client receives one-half; however, she is asking for the
7 truck. She needs to be reimbursed for the rings that he took
8 from her. Those two rings my client testified to were \$3500.

9 As to the debts, Judge, my client testified she just
10 wants Herman to pay half of the remaining consolidated debt
11 which is a little bit over \$21,000 and she wanted him to pay
12 what's left on the taxes which is a little bit more than
13 \$2,000. She's also asking Herman to repay the money that she
14 spent approximately \$4600 on the Chevy Silverado that he was
15 ordered to pay after December of 2019.

16 Judge, finally, as you can hear from the acts
17 against the -- the court orders in this case, whether that be
18 from the visitation or -- or Herman refusing to sign up for
19 the --

20 THE COURT: Oh, I've already denied the -- I've
21 already denied any order to show cause because no one bothered
22 to issue them.

23 MR. TOTI: Understood, Judge, but still when it
24 comes to fees, I -- we -- we still have the ability to ask for

1 attorney's fees as a result. And Judge, there -- there is
2 substantive proof before the Court that shows that this --
3 this case was exacerbated by his behavior and as a result I
4 would be seeking fees as well. I believe the pretrial
5 memorandum requests 7500. Thank you, Your Honor.

6 THE COURT: Thank you. All right. Mr. Robbins.

7 MR. ROBBINS: Yes, Your Honor. What we have is
8 clearly this -- this cannot be a joint physical custody case
9 by any ways. Someone has to have primary physical custody
10 here. The level of conflict is so high that -- and that's
11 been testified to that a joint -- it's -- it's just not right
12 for a joint case. So when you look at the factors to
13 determine who would be primary physical custodian and keeping
14 in mind that my client has consented to Nadine being primary
15 physical -- physical custodian of Abigail due to the long
16 period of time where she has not been in -- in his care
17 despite orders that she have -- that she be in his care from
18 Friday to Monday with no teenage discretion because of the
19 fact that Mom was failing to encourage the child to come --
20 come back with Dad. That's why that -- that order was firm.
21 She still has not encouraged Abigail to come with Dad.

22 As far as his visits with Abigail, yes, there should
23 be reunification because clearly their relationship is
24 fractured; however, Nadine should pay for that reunification

1 because she is the -- the reason for that fracture. In
2 addition, it was previously ordered that Nadine prepay for a
3 visit -- for reunification therapy. She never prepaid for
4 that therapy, instead telling Donna Gosnell that therapy was
5 no longer needed because now she had custody of Abigail.

6 As to the three boys -- and as to the three boys,
7 Herman is asking for primary physical custody. He would like
8 to have them during the week and every other weekend. He
9 would like to have Abigail on the weekends that he has the
10 boys as well so that they all can be together.

11 We've heard testimony as to the physical abuse that
12 these children are suffering in Mom's care and that's been
13 backed up by both CPS records that did in fact have a
14 substantiated case of abuse. CPS placed the children in
15 Herman's care and closed the case because they were safe in
16 Herman's care.

17 Then we heard testimony from grandma that says not
18 only did she witness the abuse against Abigail and the boys,
19 she also was abusive towards her own mother. The mother was
20 living with the -- with the parties and the children which is
21 -- which meets that stat -- part of that statute that there be
22 violence against any other person residing with the children.
23 That's K. And so there's a presumption that applies here with
24 domestic violence that Mom is not fit to have joint physical

1 custody. That is why we're asking for primary.

2 As to the school, if the children are able to be
3 accepted into Doral, then they should go there, but if not,
4 they would remain in the schools that they're currently in.
5 And I would like to also note that Mom changed the school of
6 Abigail without ever informing Dad. So this idea that Dad's
7 the one that doesn't communicate, it goes both ways. Dad's
8 intending -- intention is to start now, start fresh, and sign
9 up for that app and they can communicate there moving forward.

10 As to property and debts, those rings were community
11 property. They were sold. The money that was accessed for
12 those rings were used for community expenses. Herman needed
13 that money to move out of the house after Nadine kicked him
14 out.

15 As for other assets and debts, we have the two
16 trucks. It's -- it's basic -- it's really absurd that she's
17 asking for that 2015 Silverado knowing that Herman needs that
18 truck to be able to work. If she wants that Silverado, then
19 of course alimony should be even higher than what he's
20 requesting which he -- he said he needed a thousand dollars a
21 month. But if she's going to make it so that he's unable to
22 work and earn what he's earning now which is approximately
23 \$5600 which is backed up by the payments that he's receiving
24 into his bank account, he needs that truck to be able to work.

1 And there's testimony about why the 2004 truck won't work in
2 the same way.

3 As to other debts, there is a 60 something thousand
4 dollar medical bill. There are exhibits that are entered,
5 that he is receiving collection letters on those bills. We
6 have this printing machine that was leased or purchased either
7 way. The testimony is that she's been spending \$1500 a month
8 at least for 13 months with no benefit to the community. So
9 Plaintiff has also committed -- committed community waste and
10 Herman would be entitled to half of that money back at least.

11 So that is what we're asking for, primary physical
12 custody of the three younger boys. The -- that Herman obtain
13 the 2015 truck. They keep any other assets or debts in their
14 possession, split debts including the \$68,000 medical debts,
15 and that she pay him a thousand dollars in alimony as she
16 testified that she's always been the primary breadwinner, this
17 is a long term marriage where she's had to carry him
18 financially throughout. She makes significantly more than he
19 does. And then for attorney's fees, we're also seeking
20 attorney's fees in the amount of (indiscernible).

21 THE CLERK: One moment. I don't -- this is the
22 courtroom clerk. I don't --

23 THE COURT: Yeah.

24 THE CLERK: -- see the -- Judge, are you there?

1 THE COURT: Yes, I am.

2 THE CLERK: Okay. I'm -- well, I'm not seeing --

3 THE COURT: Oh, I'm sorry. The camera turned itself
4 off. So there you go.

5 THE CLERK: Okay. Continue.

6 THE COURT: No, I've been here this entire time.
7 Thank you.

8 THE CLERK: Okay. Continue.

9 MR. ROBBINS: Yeah, and lastly we -- we had incurred
10 attorney's fees as well in the amount of 5900. This is a
11 Sargeant case. He earns 5600 a month. Before this most
12 recent FDF filed by Ms. Williams, she was previously I believe
13 about a hundred and sixty thousand dollars a year. That is a
14 Sargeant case as well. And we're asking for attorney's fees.

15 THE COURT: All right. Thank you very much. So at
16 this point, I'm going to take this under advisement. I'll
17 actually render my decision and have it to both parties;
18 however, both parties are directly immediately to sign up for
19 an application and that will be the Ter -- Talking Parents
20 application. And to provide proof to the attorneys. I'm
21 going to say this. Your communication between both of you is
22 seriously appalling. And the Court's going to take this all
23 under consideration. But both of you need to reflect on your
24 behavior in the future. So I will go ahead and put out my

1 order within the next two weeks. Thank you very much. We're
2 off record.

3 MR. ROBBINS: Thanks, Judge

4 MR. TOTI: Thank you, Your Honor.

5 THE COURT: All right. Thank you. And then --

6 (PROCEEDINGS CONCLUDED AT 12:53:38)

7

8

9

* * * * *

10 ATTEST: I do hereby certify that I have truly and
11 correctly transcribed the digital proceedings in the above-
12 entitled case to the best of my ability.

13

14



15

16

Adrian N. Medrano

17

18

19

20

21

22

23

24

TRIAL FORM

CASE NO: D-19-586291-D
 DEPT: I

TRIAL DATE: 2/11/21
 JUDGE: SUNNY BAILEY
 CLERK: AMEIONA RATCLIFF
 REPORTER: JAVS

NADINE RATCLIFF
 Plaintiff

VS.

FRANK TOTI
 Counsel for Plaintiff

HERMAN WILLIAMS
 Defendant

KENNETH ROBBINS
 Counsel for Defendant

TRIAL BEFORE THE COURT

PLAINTIFF'S WITNESSES:

1	NADINE WILLIAMS 2-11-2021/9:18:36 AM
2	HERMAN WILLIAM 2-11-2021/11:21:18 AM
3	PHYLLIS GAYLE 2-11-2021/12:31:27 AM
4	
5	

6	
7	
8	
9	
10	

DEFENDANT'S WITNESSES:

1	
2	
3	
4	
5	

6	
7	
8	
9	
10	

REBUTTAL WITNESSES

1	
2	
3	

1	
2	
3	

PLAINTIFF'S TRIAL EXHIBITS
NADINE WILLIAMS vs. HERMAN GEORGE WILLIAMS
CASE NO. D-19-586291-D DEPT. I

NO	EXHIBIT NAME	Bates No's	Offer	Admit	Deny
1	Notice of Child Protective Services Report	001	2/11/24	2/11/24	
2	Proof of Auto Insurance For 2015 Chevrolet	001-008			
3	Statements of Payment Obligations for 2015 Chevrolet	009-0016			
4	Proof of Taxes Owe to Connecticut	0017-0019			
5	Proof of Debt Consolidation	0020-0021	2/11/24	2/11/24	
6	Police Report	0022	2/11/24		
7	DMV Records	0023-0024	2/11/24	2/11/24	

obj
 ref
 PR
 ref
 2/11/24
 ref

EXHIBIT 1



CLARK COUNTY
 DEPARTMENT OF FAMILY SERVICES
 131 South Martin Luther King Blvd
 Las Vegas, Nevada 89105
 (702) 455-5443

Notice of Child Protective Services Report Disposition

Date: December 10, 2010

Name: WILLIAMS, NADINE
 Address: 10116 DESERT TREE STREET
 LAS VEGAS NV 89141

Case No. 1454558 Report No. 1858829

Child(ren): WILLIAMS, ABIGAIL
 WILLIAMS, HERMAN
 WILLIAMS, MATHEW
 WILLIAMS, ELISHA

Dear Ms. Williams

The above named family or child was referred to our agency for Child Protective Services response and intervention. The purpose of this letter is to inform you of this agency's disposition involving the above-named minor child(ren). The Protective Services report was closed on November 25, 2010 with a disposition of Unsubstantiated.

If you have further questions, please contact the Child Protective Services Investigator, Evette Howard (702) 455-1987, who was assigned to your case.

Sincerely,

Department of Family Services



EXHIBIT

17586291-586291-D

P's Ex 1 001

EXHIBIT 2

PROGRESSIVE
P.O. BOX 31260
TAMPA, FL 33631

PROGRESSIVE
DIRECT Auto

NADINE A WILLIAMS
10116 DESERT TREES ST
LAS VEGAS, NV 89141

Policy Number: 924414230
Underwritten by:
Progressive Direct Insurance Co
February 5, 2021
Policy Period: Mar 13, 2021 - Sep 13, 2021
Page 1 of 2

progressive.com
Online Service
Make payments, check billing activity, update
policy information or check status of a claim.
1-800-776-4737
For customer service and claims service,
24 hours a day, 7 days a week.
P.O. Box 31260
Tampa, FL 33631

Auto Insurance Coverage Summary

This is your Renewal Declarations Page

The coverages, limits and policy period shown apply only if you pay for this policy to renew.

Your coverage begins on March 13, 2021 at 12:01 a.m. This policy expires on September 13, 2021 at 12:01 a.m.

Your insurance policy and any policy endorsements contain a full explanation of your coverage. The policy limits shown for a vehicle may not be combined with the limits for the same coverage on another vehicle. The policy contract is form 9611D NV (01/16). The contract is modified by form Z357 (01/07).

Drivers and resident relatives

Nadine A Williams

Additional Information

Named Insured

HERMAN G WILLIAMS JR

Outline of coverage

2015 CHEVROLET SILVERADO C2500K2500 4 DOOR EXT CAB

VIN: TGC2KVEG4FZ109300

Garaging ZIP Code: 89141

Primary use of the vehicle: Commute

Length of vehicle ownership when policy started or vehicle added: 5 years or more

	Limits	Deductible	Premium
Liability To Others			
Bodily Injury Liability	\$25,000 each person/\$50,000 each accident		\$834
Property Damage Liability	\$25,000 each accident		
Uninsured/Underinsured Motorist	\$25,000 each person/\$50,000 each accident		156
Comprehensive	Actual Cash Value	\$1,000	43
Collision	Actual Cash Value	\$1,000	328
Total premium for 2015 CHEVROLET			\$1,361

Form G-689 (07/03/16)



EXHIBIT



P's Ex 2 001

Policy Number: 924414230

Nadine A Williams

Page 2 of 2

2010 GMC ACADIA

VIN: 1GKLVLED1AJ183842

Garaging ZIP Code: 89141

Primary use of the vehicle: Pleasure

Length of vehicle ownership when policy started or vehicle added: Less than 1 month

	Limits	Deductible	Premium
Liability To Others			\$757
Bodily Injury Liability	\$25,000 each person/\$50,000 each accident		
Property Damage Liability	\$25,000 each accident		
Uninsured/Underinsured Motorist	\$25,000 each person/\$50,000 each accident		129
Comprehensive	*Actual Cash Value or Stated Amount	\$1,000	86
Collision	*Actual Cash Value or Stated Amount	\$1,000	179
Rental Reimbursement	up to \$40 each day/maximum 30 days		37
Total premium for 2010 GMC			\$1,188
*In the event of a total loss of this vehicle, the maximum amount payable is the lesser of the actual cash value or the stated amount of \$10,000			
Total 6 month policy premium			\$2,549.00

Premium discounts

Policy	Discount
924414230	Multi-Policy, Electronic Funds Transfer (EFT), Multi-Car, Continuous Insurance* Platinum and Paperless
Vehicle	Discount
2015 CHEVROLET SILVERADO C2500K2500	Airbag
2010 GMC ACADIA	Airbag

Lienholder Information

Vehicle	Lienholder
2015 CHEVROLET SILVERADO C2500K2500 1GCRVEG64FZ109300	CHASE AUTO FINANCE FT WORTH, TX 76101

Information about your premium

If your renewal premium has increased, you may call Customer Service for additional information regarding the reason for this change.

Agent countersignature

Phonda Holl - Chad

Company officers

MR [Signature]

Secretary

PROGRESSIVE
P.O. BOX 31260
TAMPA, FL 33631



NADINE A WILLIAMS
10116 DESERT TREES ST
LAS VEGAS, NV 89141

Policy Number: 924414230
Underwritten by:
Progressive Direct Insurance Co
July 2, 2020
Policy Period: Mar 13, 2020 - Sep 13, 2020
Page 1 of 2

progressive.com
Online Service
Make payments, check billing activity, update
policy information or check status of a claim.

1-800-776-4737
For customer service and claims service,
24 hours a day, 7 days a week.
P.O. Box 31260
Tampa, FL 33631

Auto Insurance Coverage Summary

This is your Declarations Page
Your coverage has changed

Your coverage began on March 13, 2020 at 12:01 a.m. This policy expires on September 13, 2020 at 12:01 a.m.
This coverage summary replaces your prior one. Your insurance policy and any policy endorsements contain a full explanation of your coverage. The policy limits shown for a vehicle may not be combined with the limits for the same coverage on another vehicle. The policy contract is form 9611D NV (01/16). The contract is modified by form Z357 (01/07).

Policy changes effective July 2, 2020

Changes requested on:	Jul 2, 2020 07:45 p.m.
Requested by:	Nadine A Williams
Premium change:	\$63.52
Changes:	The 2010 GMC ACADIA has been added. The 2019 CHEVROLET TRAVERSE has been removed.

The changes take effect as of the date and time requested shown above.

Drivers and resident relatives

	Additional Information
Nadine A Williams	Named insured
HERMAN G WILLIAMS JR	

Outline of coverage

2015 CHEVROLET SILVERADO C2500K2500 4 DOOR EXT CAB

VIN: 1GC2KVEG4FZ109300

Garaging ZIP Code: 89141

Primary use of the vehicle: Commute

Length of vehicle ownership when policy started or vehicle added: 5 years or more

	Limits	Deductible	Premium
Liability To Others			
Bodily Injury Liability	\$25,000 each person/\$50,000 each accident		\$656
Property Damage Liability	\$25,000 each accident		
Uninsured/Underinsured Motorist	\$25,000 each person/\$50,000 each accident		136
Comprehensive	Actual Cash Value	\$1,000	39
Collision	Actual Cash Value	\$1,000	273
Total premium for 2015 CHEVROLET			\$1,104

Form 6489 NV (03/18)



P's Ex 2 003

Policy Number: 924414230

Nadine A Williams

Page 2 of 2

2010 GMC ACADIA

VIN: 1GKLVLED1AJ188423

Garaging ZIP Code: 89141

Primary use of the vehicle: Pleasure

Length of vehicle ownership when policy started or vehicle added: Less than 1 month

	Limits	Deductible	Premium
Liability To Others			\$598
Bodily Injury Liability	\$25,000 each person/\$50,000 each accident		
Property Damage Liability	\$25,000 each accident		
Uninsured/Underinsured Motorist	\$25,000 each person/\$50,000 each accident		120
Comprehensive	Actual Cash Value or Stated Amount	\$1,000	152
Comprehensive Window Glass		\$0 glass	
Collision	Actual Cash Value or Stated Amount	\$1,000	187
Rental Reimbursement	up to \$40 each day/maximum 30 days		25
Total premium for 2010 GMC			\$1,082
*In the event of a total loss of this vehicle, the maximum amount payable is the lesser of the actual cash value or the stated amount of \$15,000.			
Total 6 month policy premium			\$2,186.00

Premium discounts

Policy	
924414230	Multi Policy, Electronic Funds Transfer (EFT) Multi-Car, Continuous Insurance Plat num and Paperless
Vehicle	
2015 CHEVROLET SILVERADO C2500K2500	Airbag
2010 GMC ACADIA	Airbag

Lienholder information

Vehicle	Lienholder
2015 CHEVROLET SILVERADO C2500K2500 1G22KVEG4FZ109300	CHASE AUTO FINANCE FT WORTH, TX 76101

Agent countersignature

Phondyford - Clark

Company officers

MR [Signature]

Secretary

PROGRESSIVE
P.O. BOX 31260
TAMPA, FL 33631



NADINE A WILLIAMS
10116 DESERT TREES ST
LAS VEGAS, NV 89141

Policy Number: 924414230
Underwritten by:
Progressive Direct Insurance Co
February 6, 2020
Policy Period: Mar 13, 2020 - Sep 13, 2020
Page 1 of 2

progressive.com
Online Service
Make payments, check billing activity, update
policy information or check status of a claim

1-800-776-4737
For customer service and claims service,
24 hours a day, 7 days a week.
P.O. Box 31260
Tampa, FL 33631

Auto Insurance Coverage Summary

This is your Renewal Declarations Page

The coverages, limits and policy period shown apply only if you pay for this policy to renew.

Your coverage begins on March 13, 2020 at 12:01 a.m. This policy expires on September 13, 2020 at 12:01 a.m.

Your insurance policy and any policy endorsements contain a full explanation of your coverage. The policy limits shown for a vehicle may not be combined with the limits for the same coverage on another vehicle. The policy contract is form 9611D NV (01/16). The contract is modified by form Z357 (01/07)

Drivers and resident relatives

Nadine A Williams

Additional information

Married insured

HERMAN G WILLIAMS JR

Outline of coverage

2019 CHEVROLET TRAVERSE 4 DOOR WAGON

VIN: 1GNERNK1W9KJ240335

Garaging ZIP Code: 89141

Primary use of the vehicle: Pleasure

Length of vehicle ownership when policy started or vehicle added. At least 1 month but less than 1 year

	Limits	Deductible	Premium
Liability To Others			\$509
Bodily Injury Liability	\$25,000 each person/\$50,000 each accident		
Property Damage Liability	\$25,000 each accident		
Uninsured/Underinsured Motorist	\$25,000 each person/\$50,000 each accident		165
Comprehensive	Actual Cash Value	\$1,000	40
Collision	Actual Cash Value	\$1,000	252
Rental Reimbursement	up to \$40 each day/maximum 30 days		36
Total premium for 2019 CHEVROLET			\$1,002

Policy Number: 924414230

Nadine A Williams

Page 2 of 2

2015 CHEVROLET SILVERADO C2500K2500 4 DOOR EXT CAB

VIN 1G2KVEG4FZ109300

Garaging ZIP Code: 89141

Primary use of the vehicle: Commute

Length of vehicle ownership when policy started or vehicle added: 5 years or more

	Units	Deductible	Premium
Liability To Others			
Bodily Injury Liability	\$25,000 each person/\$50,000 each accident		\$683
Property Damage Liability	\$25,000 each accident		
Uninsured/Underinsured Motorist	\$25,000 each person/\$50,000 each accident		99
Comprehensive	Actual Cash Value	\$1,000	41
Collision	Actual Cash Value	\$1,000	284
Total premium for 2015 CHEVROLET			\$1,107
Total 6 month policy premium			\$2,109.00

Premium discounts

Policy	Discount
924414230	Electronic Funds Transfer (EFT), Multi-Car, Continuous Insurance, Platinum and Paperless
Vehicle	Discount
2019 CHEVROLET TRAVERSE	Airbag
2015 CHEVROLET SILVERADO C2500K2500	Airbag

Lienholder information

Vehicle	Lienholder
2019 CHEVROLET TRAVERSE 1GNER6KW9K240335	GM FINANCIAL MINNEAPOLIS, MN 55440
2015 CHEVROLET SILVERADO C2500K2500 1G2KVEG4FZ109300	CHASE AUTO FINANCE FT WORTH, TX 76101

Information about your premium

If your renewal premium has increased, you may call Customer Service for additional information regarding the reason for this change.

Agent countersignature

Phonda Hill - CNA

Company officers

MR [Signature]

Secretary

PROGRESSIVE
P.O. BOX 31260
TAMPA, FL 33631



NADINE A WILLIAMS
10116 DESERT TREES ST
LAS VEGAS, NV 89141

Policy Number: 924414230
Underwritten by:
Progressive Direct Insurance Co
October 5, 2019
Policy Period: Sep 13, 2019 - Mar 13, 2020
Page 1 of 2

progressive.com
Online Service
Make payments, check billing activity, update
policy information or check status of a claim.

1-800-776-4737
For customer service and claims service,
24 hours a day, 7 days a week.
P.O. Box 31260
Tampa, FL 33631

Auto Insurance Coverage Summary

This is your Declarations Page
Your coverage has changed

Your coverage began on September 13, 2019 at 12:01 a.m. This policy expires on March 13, 2020 at 12:01 a.m.

This coverage summary replaces your prior one. Your insurance policy and any policy endorsements contain a full explanation of your coverage. The policy limits shown for a vehicle may not be combined with the limits for the same coverage on another vehicle. The policy contract is form 9611D NV (01/16). The contract is modified by form Z357 (01/07).

Policy changes effective October 5, 2019

Changes requested on:	Oct 5, 2019 09:33 p.m
Requested by:	Nadine A Williams
Premium change:	-\$575.75
Changes:	The 2009 KIA RONDO has been removed

Drivers and resident relatives

	Additional Information
Nadine A Williams	Named Insured
HERMAN G WILLIAMS JR	

Outline of coverage

2019 CHEVROLET TRAVERSE 4 DOOR WAGON
VIN: 1GNER6KW9K1240335
Garaging ZIP Code: 89141
Primary use of the vehicle: Pleasure
Number of years owned/leased when policy started or vehicle added: < 1 year

	Limits	Deductible	Premium
Liability To Others			
Bodily Injury Liability	\$25,000 each person/\$50,000 each accident		\$445
Property Damage Liability	\$25,000 each accident		
Uninsured/Underinsured Motorist	\$25,000 each person/\$50,000 each accident		169
Comprehensive	Actual Cash Value	\$1,000	48
Collision	Actual Cash Value	\$1,000	204
Rental Reimbursement	up to \$30 each day/maximum 30 days		25
Total premium for 2019 CHEVROLET			\$891



Policy Number 924414230

Nadine A Williams

Page 2 of 2

2015 CHEVROLET SILVERADO C2500K2500 4 DOOR EXT CAB

VIN: 1G2KVEG4FZ109300

Garaging ZIP Code: 89141

Primary use of the vehicle: Commute

Number of years owned/leased when policy started or vehicle added: 5+ years

	Limits	Deductible	Premium
Liability To Others			\$570
Body Injury Liability	\$25,000 each person/\$50,000 each accident		
Property Damage Liability	\$25,000 each accident		
Uninsured/Underinsured Motorist	\$25,000 each person/\$50,000 each accident		119
Comprehensive	Actual Cash Value	\$1,000	59
Collision	Actual Cash Value	\$1,000	261
Total premium for 2015 CHEVROLET			\$1,009
Total 6 month policy premium			\$1,900.00

Premium discounts

Policy	
924414230	Electronic Funds Transfer (EFT), Multi-Car, Continuous Insurance, Platinum and Paperless
Vehicle	
2019 CHEVROLET TRAVERSE	Airbag
2015 CHEVROLET SILVERADO C2500K2500	Airbag

Lienholder information

Vehicle	Lienholder
2019 CHEVROLET TRAVERSE 1GNRGK9K240335	GM FINANCIAL MINNEAPOLIS, MN 55440
2015 CHEVROLET SILVERADO C2500K2500 1G2KVEG4FZ109300	CHASE AUTO FINANCE FT WORTH, TX 76101

Agent countersignature

Phonda Hill - Chad

Company officers

MR [Signature]

Secretary

EXHIBIT 3

0033422 1 of 1 HSP04LCS NPI 32519 10000000000
 HADINE A WILLIAMS
 2342 VIA FIRENZE
 HENDERSON, NV 89044-0500

Your account is current.
 Thank you!

Statement Date 11/21/19
 Payment Due 12/10/19 Amount Due \$501.14

Thank you for being a CHASE AUTO customer. We appreciate your business.

Loan Information

Account Number 19524210198640
 Vehicle Description 2015 CHEVROLET SILVERADO 2500H
 VIN 1G62KVEG4FZ18A300
 Interest Rate 5.14%
 Principal Balance as of 11/21/19 \$2,852.12

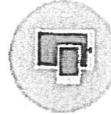
Explanation of Amount Due

Current Payment Due \$501.14
 Amount Past Due \$0.00
 Fees and Charges \$0.00
TOTAL PAYMENT DUE ON 12/10/19 \$501.14

Message Center

The principal balance displayed above is not your payoff. For a payoff quote, please visit chase.com.

ACCESS YOUR ACCOUNT ON THE GO



Download the Chase Mobile® app.
 Visit chase.com/Mobile to find out more.

Ways to Pay

You can make your loan payment at no cost in many convenient ways:

- Make one-time or set up repeating automatic payments on chase.com or through the Chase Mobile app™
- Pay by phone 1-800-346-8127
- At any full-service Chase branch
- Mail your payment with the coupon below

Resources

- Visit our website at chase.com
- FAQs at chase.com/AutoServicing
- Call customer service at 1-800-336-6678
 - 24/7 automated response
 - TTY 1-800-524-2766
- Download the Chase Mobile app
 Text mobile to 24273

Auto Loan Payment Coupon

HADINE A WILLIAMS
 Account Number 19524210198640
 Due Date 12/10/19
 Scheduled Payment Amount \$501.14
 Total Payment Due \$501.14

Make checks payable to Chase Auto.
 Write your account number on your check. Do not send cash.

Amount Enclosed \$

19524210198640 0050114 00501143

CHASE AUTO FINANCE
 PO BOX 78232
 PHOENIX AZ 85062-8232

⑆ 5000 200 2 71⑆ 19524 2 10 198640⑆

PLAINIFF'S EXHIBIT
 158629
 12/11/19
 58691-1

Transaction Activity

Date	Description	Total
11/08/19	PAYMENT - THANK YOU (PRINCIPAL \$469.54) (INTEREST \$15.60)	(\$501.14)

Additional Information

Attention Servicemembers: If you are a federal or state military servicemember who is or within the past year was, on "active duty" or "active service," or a spouse or dependent of such a servicemember, you may be entitled to certain legal rights and protections. For more information, call Chase Military Services at 1-877-469-0110.

Contact Information

Visit chase.com or Chase Mobile app to view activity & account history, activate alerts, opt for paperless statements, make payments, and contact us through secure messaging. Please include your name and account number on all written correspondence.

Customer Service Inquiries CHASE AUTO PO Box 901076 Fort Worth TX 76101-2076 1-800-336-6675	Payment CHASE AUTO PO Box 78232 Phoenix AZ 85062-8232	Certified Funds Payoff <i>(such as Cashier's Checks)</i> CHASE AUTO PO Box 901023 Fort Worth TX 76101-2023	Standard Payoff <i>(such as Personal Checks)</i> CHASE AUTO PO Box 78067 Phoenix AZ 85062-8067
Credit Bureau Disputes Chase Auto Credit Bureau Dispute Processing PO Box 801003 Fort Worth TX 76101-2003	Overnight Payment CHASE AUTO 1820 E Sky Harbor Circle S Suite 156 Phoenix AZ 85034-4875	Overnight Certified Funds Payoff CHASE AUTO 14600 Frye Road Payment Services, TX1-0018 Fort Worth TX 76155-2732	Overnight Standard Payoff CHASE AUTO 14600 Frye Road Payment Services, TX1-1300 Fort Worth TX 76155-2732

Crediting of Payments by Mail

Payments will be credited as of the day we receive them if the payment is received by 12:00 noon in the time zone in which the mailing address on your payment coupon is located and if (a) the payment is received Monday through Friday except for bank or legal holidays, (b) the payment is received at the address shown on your payment coupon, (c) your payment is made with a check or money order drawn on a U.S. bank in U.S. dollars, (d) the attached payment coupon is enclosed with your payment, and (e) your payment is sent in the enclosed return envelope.

Credit for payments made in any other manner may be delayed for up to five (5) days, during which time applicable Finance Charges will continue to accrue. Please allow five to seven (5-7) days for payments to reach the payment address, and include your account number and name on the front of your check or money order. Do not send cash and do not staple, tape, or paper clip your payment to your payment coupon. All payments must be in U.S. funds.

Over Payments

Any amounts over the "Total Payment Due" will be applied toward principal reduction. You'll be due for your usual monthly payment the following month. If you have questions regarding over payments, please contact us at 1-800-336-6675.

Moving?

You can change your address by signing into chase.com, or calling our customer service number shown on the front of this statement. In addition, please be advised that we may change your billing address on this account, without further notice to you, if the United States Postal Service notifies us that your address has changed.

Notice of Furnishing Negative Information to Credit Bureaus:

We may report information about your account to credit bureaus. Late payments, missed payments, or other defaults on your account may be reflected in your credit report.

Notice of Dispute of Accuracy of Information:

You have the right to dispute the accuracy of the credit information reported by writing to us at the Credit Bureau Disputes address listed above.

Late Charges

A late charge will be assessed if a payment is received after its due date, as permitted and according to the terms of your contract.

Important Bankruptcy Information

If you or your account is subject to a pending bankruptcy proceeding, or if you received a bankruptcy discharge, this statement is for informational purposes and is not an attempt to collect a debt or to impose personal liability.

Payoff

The Unpaid Principal Balance on your statement is not a payoff quote. Payoff quotes are available by signing in to your account on chase.com. You can also request a quote anytime through our 24-hour automated phone service by calling 1-800-336-6675. If you payoff by mail, please send it directly to the correct Payoff address above based upon the form of payment being provided and your preferred mailing option (regular or overnight). Please be sure to include your name and account number.



JPMorgan Chase Bank, N.A. Member FDIC © JPMorgan Chase & Co

ALC1

Address or Phone Number changing? Changes can be made by signing into chase.com or calling customer service.

Authorization to Convert Your Check to an Electronic Transfer Debit: When you provide a check as payment, you authorize us either to use information from your check to make a one-time electronic fund transfer from your account or to process the payment as a check. Your bank account may be debited as soon as the same day we receive your payment. You will not receive your check back from your institution.

Stay connected with the Chase Mobile® app to pay your bill from a Chase checking account, go paperless, or check your balance and due date. Get the app by texting "mobile" to 24273.

Chase Mobile app is available for select mobile devices. Enroll in Chase Online™ and download the Chase Mobile app. There is no charge from Chase, but message and data rates may apply.

Your account is current.
Thank you!

003454 1 of 1 HSPALCO 1871 65120 100000000000
NADINE A WILLIAMS
2342 VIA FIRENZE
HENDERSON, NV 89044-0500

Statement Date 02/20/20
Payment Due 03/10/20 | Amount Due \$501.14

Thank you for being a CHASE AUTO customer. We appreciate your business.

Loan Information

Account Number 19524210198640
Vehicle Description 2015 CHEVROLET SILVERADO 2500H
VIN 1G2KVEG4FZ169300
Interest Rate 6.14%
Principal Balance as of 02/20/20 \$573.38

Explanation of Amount Due

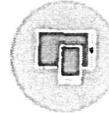
Current Payment Due	\$501.14
Amount Paid Due	\$0.00
Fees and Charges	\$0.00
TOTAL PAYMENT DUE ON 02/18/20	\$501.14

Message Center

Congratulations on reaching an important milestone - you're nearing the end of your auto loan payment! Please visit us at chase.com or call us to receive a payoff quote, steps on how to complete your payoff, and information on your lien release or how to receive your title. Important: Don't forget to cancel any recurring payments you may have set up with a bill pay service prior to submitting your final payment.

Interest Paid on this account during 2019 was \$256.57

ACCESS YOUR ACCOUNT ON THE GO



Download the Chase Mobile® app.
Visit chase.com/mobile to find out more.

Ways to Pay

You can make your loan payment at no cost in many convenient ways:

- Make one-time or set up repeating automatic payments on chase.com or through the Chase Mobile app®
- Pay by phone 1-800-346-0127
- At any full-service Chase branch
- Mail your payment with the coupon below

Resources

- Visit our website at chase.com
- FAQs at chase.com/AutoServicing
- Call customer service at 1-800-338-6676
- 24/7 automated response
- TTY 1-800-624-6785
- Download the Chase Mobile app
Text mobile to 24273

Auto Loan Payment Coupon

NADINE A WILLIAMS
Account Number 19524210198640
Due Date 03/10/20
Scheduled Payment Amount \$501.14
Total Payment Due \$501.14

Make checks payable to Chase Auto.
Write your account number on your check. Do not send cash.
Amount Enclosed \$

19524210198640 0050114 00501143

CHASE AUTO FINANCE
PO BOX 76232
PHOENIX AZ 85062-8232

⑆ 5000 200 27⑆ 19524 210198640⑆

Transaction Activity

Date	Description	Total
02/10/20	PAYMENT - THANK YOU (PRINCIPAL \$495.18) (INTEREST \$5.86)	(\$501.14)

Additional Information

Attention Servicemembers: If you are a federal or state military servicemember who is or within the past year was, on "active duty" or "active service," or a spouse or dependent of such a servicemember, you may be entitled to certain legal rights and protections. For more information, call Chase Military Services at 1-877-469-0110.

Contact Information

Visit chase.com or Chase Mobile app to view activity & account history, activate alerts, opt for paperless statements, make payments, and contact us through secure messaging. Please include your name and account number on all written correspondence.

Customer Service Inquiries CHASE AUTO PO Box 801076 Fort Worth TX 76101-2076 1-800-336-6676	Payment CHASE AUTO PO Box 78232 Phoenix AZ 85062-8232	Certified Funds Payoff <i>(such as Cashier's Checks)</i> CHASE AUTO PO Box 801023 Fort Worth TX 76101-2023	Standard Payoff <i>(such as Personal Checks)</i> CHASE AUTO PO Box 78067 Phoenix AZ 85062-8067
Credit Bureau Disputes Chase Auto Credit Bureau Dispute Processing PO Box 801003 Fort Worth TX 76101-2003	Overnight Payment CHASE AUTO 1620 E Sky Harbor Circle S Suite 150 Phoenix AZ 85034-4875	Overnight Certified Funds Payoff CHASE AUTO 14600 Frye Road Payment Services, TX 1-0016 Fort Worth TX 76155-2732	Overnight Standard Payoff CHASE AUTO 14600 Frye Road Payment Services, TX 1-1300 Fort Worth TX 76155-2732

Crediting of Payments by Mail
 Payments will be credited as of the day we receive them if the payment is received by 12:00 noon in the time zone in which the mailing address on your payment coupon is located and:

- the payment is received Monday through Friday except for bank or legal holidays,
- the payment is received at the address shown on your payment coupon,
- your payment is made with a check or money order drawn on a U.S. bank in U.S. dollars,
- the attached payment coupon is enclosed with your payment, and
- your payment is sent in the enclosed return envelope.

Credit for payments made in any other manner may be delayed for up to five (5) days, during which time applicable Finance Charges will continue to accrue.

Please allow five to seven (5-7) days for payments to reach the payment address, and include your account number and name on the front of your check or money order. Do not send cash and do not staple, tape, or paper clip your payment to your payment coupon. All payments must be in U.S. funds.

Over Payments

Any amounts over the "Total Payment Due" will be applied toward principal reduction. You'll be due for your usual monthly payment the following month. If you have questions regarding over payments, please contact us at 1-800-336-6676.

Moving?

You can change your address by signing into chase.com or calling our customer service number shown on the front of this statement. In addition, please be advised that we may change your billing address on this account, without further notice to you, if the United States Postal Service notifies us that your address has changed.

Notice of Furnishing Negative Information to Credit Bureaus:

We may report information about your account to credit bureaus. Late payments, missed payments, or other defaults on your account may be reflected in your credit report.

Notice of Dispute of Accuracy of Information:

You have the right to dispute the accuracy of the credit information reported by writing to us at the Credit Bureau Disputes address listed above.

Late Charges

A late charge will be assessed if a payment is received after its due date, as permitted and according to the terms of your contract.

Important Bankruptcy Information

If you or your account is subject to a pending bankruptcy proceeding, or if you received a bankruptcy discharge, this statement is for informational purposes and is not an attempt to collect a debt or to impose personal liability.

Payoff

The Unpaid Principal Balance on your statement is not a payoff quote. Payoff quotes are available by signing in to your account on chase.com. You can also request a quote anytime through our 24-hour automated phone service by calling 1-800-336-6676. If you payoff by mail, please send it directly to the correct Payoff address above based upon the form of payment being provided and your preferred mailing option (regular or overnight). Please be sure to include your name and account number.



JP Morgan Chase Bank, N.A. Member FDIC © JPMorgan Chase & Co

ALC1

Address or Phone Number changing? Changes can be made by signing into chase.com or calling customer service.

Authorization to Convert Your Check to an Electronic Transfer Debit: When you provide a check as payment, you authorize us either to use information from your check to make a one-time electronic fund transfer from your account or to process the payment as a check. Your bank account may be debited as soon as the same day we receive your payment. You will not receive your check back from your institution.

Stay connected with the Chase Mobile® app to pay your bill from a Chase checking account, go paperless or check your balance and due date. Get the app by texting "mobile" to 24273.

*Chase Mobile app is available for select mobile devices. Enroll in Chase Online™ and download the Chase Mobile app. There is no charge from Chase, but message and data rates may apply.

003415 1 of 1 NSPOLCO NPI 02220 10000000000
 NADINE A WILLIAMS
 2342 VIA FIRENZE
 HENDERSON, NV 89044-0500

Your account is current.
 Thank you!

Statement Date 01/22/20

Payment Due	Amount Due
02/10/20	\$501.14

Thank you for being a CHASE AUTO customer. We appreciate your business.

Loan Information

Account Number	19524210198640
Vehicle Description	2015 CHEVROLET SILVERADO 2500H
VIN	1G22KVEG4FZ109300
Interest Rate	6.14%
Principal Balance as of 01/22/20	\$1,365.55

Explanation of Amount Due

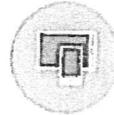
Current Payment Due	\$501.14
Amount Past Due	\$0.00
Fees and Charges	\$0.00
TOTAL PAYMENT DUE ON 02/10/20	\$501.14

Message Center

Interest Paid on this account during 2019 was \$258.57

The principal balance displayed above is not your payoff. For a payoff quote, please visit chase.com.

ACCESS YOUR ACCOUNT ON THE GO



Download the Chase Mobile® app.
 Visit chase.com/Mobile to find out more.

Ways to Pay

You can make your loan payment at no cost in many convenient ways:

- Make one-time or set up repeating automatic payments on chase.com or through the Chase Mobile app™
- Pay by phone 1-800-346-0127
- At any full-service Chase branch
- Mail your payment with the coupon below

Resources

- Visit our website at chase.com
- FAQs at chase.com/AutoServices
- Call customer service at 1-800-330-6878
 - 24/7 automated response
 - TTY 1-800-524-8766
- Download the Chase Mobile app
 Text mobile to 24273

Auto Loan Payment Coupon

NADINE A WILLIAMS
 Account Number 19524210198640
 Due Date 02/10/20
 Scheduled Payment Amount \$501.14
 Total Payment Due \$501.14

Make checks payable to Chase Auto.
 Write your account number on your check. Do not send cash.
 Amount Enclosed \$

19524210198640 0050114 00501143

CHASE AUTO FINANCE
 PO BOX 78232
 PHOENIX AZ 85062-8232

⑆5000 200 27⑆ 19524210198640⑆

Transaction Activity

Date	Description	Total
01/10/20	PAYMENT - THANK YOU (PRINCIPAL \$493.03) (INTEREST \$5.11)	(\$501.14)

Additional Information

Attention Servicemembers: If you are a federal or state military servicemember who is, or within the past year was, on "active duty" or "active service" or a spouse or dependent of such a servicemember, you may be entitled to certain legal rights and protections. For more information, call Chase Military Services at 1-877-469-0110.

Contact Information

Visit chase.com or Chase Mobile app to view activity & account history, activate alerts, opt for paperless statements, make payments, and contact us through secure messaging. Please include your name and account number on all written correspondence.

Customer Service Inquiries
CHASE AUTO
PO Box 901078
Fort Worth TX 76101-2078
1-800-336-6675

Payment
CHASE AUTO
PO Box 78232
Phoenix AZ 85062-8232

Certified Funds Payoff
(such as Cashiers Checks)
CHASE AUTO
PO Box 901023
Fort Worth TX 76101-2023

Standard Payoff
(such as Personal Checks)
CHASE AUTO
PO Box 78067
Phoenix AZ 85062-8067

Credit Bureau Disputes
Chase Auto
Credit Bureau Dispute Processing
PO Box 901003
Fort Worth TX 76101-2003

Overnight Payment
CHASE AUTO
1620 E Sky Harbor Circle S
Suite 150
Phoenix AZ 85034-4875

Overnight Certified Funds Payoff
CHASE AUTO
14800 Frye Road
Payment Services, TX 1-0016
Fort Worth TX 76155-2732

Overnight Standard Payoff
CHASE AUTO
14800 Frye Road
Payment Services, TX 1-1300
Fort Worth TX 76155-2732

Crediting of Payments by Mail
Payments will be credited as of the day we receive them if the payment is received by 12:00 noon in the time zone in which the mailing address on your payment coupon is located and if:
(a) the payment is received Monday through Friday except for bank or legal holidays,
(b) the payment is received at the address shown on your payment coupon,
(c) your payment is made with a check or money order drawn on a U.S. bank in U.S. dollars,
(d) the attached payment coupon is enclosed with your payment, and
(e) your payment is sent in the enclosed return envelope.
Credit for payments made in any other manner may be delayed for up to five (5) days, during which time applicable Finance Charges will continue to accrue.
Please allow five to seven (5-7) days for payments to reach the payment address, and include your account number and name on the front of your check or money order. Do not send cash and do not staple, tape, or paper clip your payment to your payment coupon. All payments must be in U.S. funds.

Over Payments
Any amounts over the "Total Payment Due" will be applied toward principal reduction. You'll be due for your usual monthly payment the following month. If you have questions regarding over payments, please contact us at 1-800-336-6675.

Moving?
You can change your address by signing into chase.com or calling our customer service number shown on the front of this statement. In addition, please be advised that we may change your billing address on this account, without further notice to you, if the United States Postal Service notifies us that your address has changed.

Notice of Furnishing Negative Information to Credit Bureaus:
We may report information about your account to credit bureaus. Late payments, missed payments, or other defaults on your account may be reflected in your credit report.

Notice of Dispute of Accuracy of Information:
You have the right to dispute the accuracy of the credit information reported by writing to us at the Credit Bureau Disputes address listed above.

Late Charges
A late charge will be assessed if a payment is received after its due date, as permitted and according to the terms of your contract.

Important Bankruptcy Information
If you or your account is subject to a pending bankruptcy proceeding, or if you received a bankruptcy discharge, this statement is for informational purposes and is not an attempt to collect a debt or to impose personal liability.

Payoff
The Unpaid Principal Balance on your statement is not a payoff quote. Payoff quotes are available by signing in to your account on chase.com. You can also request a quote anytime through our 24-hour automated phone service by calling 1-800-336-6675. If you pay off by mail, please send it directly to the correct Payoff address above based upon the form of payment being provided and your preferred mailing option (regular or overnight). Please be sure to include your name and account number.



JPMorgan Chase Bank, N.A. Member FDIC © JPMorgan Chase & Co.

ALC1

Address or Phone Number changing? Changes can be made by signing into chase.com or calling customer service.

Authorization to Convert Your Check to an Electronic Transfer Debit: When you provide a check as payment, you authorize us either to use information from your check to make a one-time electronic fund transfer from your account or to process the payment as a check. Your bank account may be debited as soon as the same day we receive your payment. You will not receive your check back from your institution.

Stay connected with the Chase Mobile® app to pay your bill from a Chase checking account, go paperless, or check your balance and due date. Get the app by texting "mobiles" to 24273.

*Chase Mobile app is available for select mobile devices. Enroll in Chase Online™ and download the Chase Mobile app. There is no charge from Chase but message and data rates may apply.

0091634 1 of 1 NSFOALCO NPI 35418 10000000000
NADINE A WILLIAMS
2342 VIA FIRENZE
HENDERSON, NV 89044-0500

Your account is current
Thank you!
Statement Date 12/22/19
Payment Due 01/10/20 Amount Due \$501.14

Thank you for being a CHASE AUTO customer. We appreciate your business.

Loan Information

Account Number 19524210198640
Vehicle Description 2015 CHEVROLET SILVERADO 2500H
VIN 1GC2KVEG4FZ109300
Interest Rate 6.14%
Principal Balance as of 12/22/19 \$1,661.59

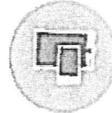
Explanation of Amount Due

Current Payment Due \$501.14
Amount Paid Due \$0.00
Fees and Charges \$0.00
TOTAL PAYMENT DUE ON 01/10/20 \$501.14

Message Center

The principal balance displayed above is not your payoff. For a payoff quote, please visit chase.com.

ACCESS YOUR ACCOUNT ON THE GO



Download the Chase Mobile® app.
Visit chase.com/Mobile to find out more.

Ways to Pay

You can make your loan payment at no cost in many convenient ways:

- Make one-time or set up repeating automatic payments on chase.com or through the Chase Mobile app®.
- Pay by phone 1-800-346-8127
- At any full-service Chase branch
- Mail your payment with the coupon below

Resources

- Visit our website at chase.com
- FAQs at chase.com/AutoService
- Call customer service at 1-800-346-8876
 - 24/7 automated response
 - TTY 1-800-824-8765
- Download the Chase Mobile app
Text mobile to 24273

Auto Loan Payment Coupon

NADINE A WILLIAMS
Account Number 19524210198640
Due Date 01/10/20
Scheduled Payment Amount \$501.14
Total Payment Due \$501.14

Make checks payable to Chase Auto.
Write your account number on your check. Do not send cash.
Amount Enclosed \$

19524210198640 0050114 00501143

CHASE AUTO FINANCE
PO BOX 78232
PHOENIX AZ 85062-8232

⑆5000 200 27⑆ 195 24 2 10 198640⑈

Transaction Activity

Date	Description	Total
12/10/19	PAYMENT - THANK YOU (PRINCIPALS \$490.53) (INTEREST \$10.61)	(\$501.14)

Additional Information

Attention Servicemembers: If you are a federal or state military service member who is, or within the past year was, on "active duty" or "active service" or a spouse or dependent of such a servicemember, you may be entitled to certain legal rights and protections. For more information, call Chase Military Services at 1-877-469-0110.

Contact Information

Visit chase.com or Chase Mobile app to view activity & account history, activate alerts, opt for paperless statements, make payments, and contact us through secure messaging. Please include your name and account number on all written correspondence.

Customer Service Inquiries CHASE AUTO PO Box 801076 Fort Worth TX 76101-2076 1-800-336-6675	Payment CHASE AUTO PO Box 78232 Phoenix AZ 85062-8232	Certified Funds Payoff (such as Cashier's Checks) CHASE AUTO PO Box 801023 Fort Worth TX 76101-2023	Standard Payoff (such as Personal Checks) CHASE AUTO PO Box 78067 Phoenix AZ 85062-8067
Credit Bureau Disputes Chase Auto Credit Bureau Dispute Processing PO Box 801003 Fort Worth TX 76101-2003	Overnight Payment CHASE AUTO 1820 E Sky Harbor Circle S Suite 150 Phoenix AZ 85034-4875	Overnight Certified Funds Payoff CHASE AUTO 14600 Frye Road Payment Services, TX1 D016 Fort Worth TX 76155-2732	Overnight Standard Payoff CHASE AUTO 14600 Frye Road Payment Services, TX 1-1300 Fort Worth TX 76155-2732

Crediting of Payments by Mail
 Payments will be credited as of the day we receive them if the payment is received by 12:00 noon in the time zone in which the mailing address on your payment coupon is located and if (a) the payment is received Monday through Friday except for bank or legal holidays, (b) the payment is received at the address shown on your payment coupon, (c) your payment is made with a check or money order drawn on a U.S. bank in U.S. dollars, (d) the attached payment coupon is enclosed with your payment, and (e) your payment is sent in the enclosed return envelope. Credit for payments made in any other manner may be delayed for up to five (5) days, during which time applicable Finance Charges will continue to accrue. Please allow five to seven (5-7) days for payments to reach the payment address, and include your account number and name on the front of your check or money order. Do not send cash and do not staple, tape, or paper clip your payment to your payment coupon. All payments must be in U.S. funds.

Over Payments
 Any amounts over the "Total Payment Due" will be applied toward principal reduction. You'll be due for your usual monthly payment the following month. If you have questions regarding over payments, please contact us at 1-800-336-6675.

Moving?
 You can change your address by signing into chase.com or calling our customer service number shown on the front of this statement. In addition, please be advised that we may change your billing address on this account, without further notice to you, if the United States Postal Service notifies us that your address has changed.

Notice of Furnishing Negative Information to Credit Bureaus:
 We may report information about your account to credit bureaus. Late payments, missed payments, or other defaults on your account may be reflected in your credit report.
Notice of Dispute of Accuracy of Information:
 You have the right to dispute the accuracy of the credit information reported by writing to us at the Credit Bureau Disputes address listed above.

Late Charges:
 A late charge will be assessed if a payment is received after its due date, as permitted and according to the terms of your contract.

Important Bankruptcy Information:
 If you or your account is subject to a pending bankruptcy proceeding, or if you received a bankruptcy discharge, this statement is for informational purposes and is not an attempt to collect a debt or to impose personal liability.

Payoff
 The Unpaid Principal Balance on your statement is not a payoff quote. Payoff quotes are available by signing in to your account on chase.com. You can also request a quote anytime through our 24-hour automated phone service by calling 1-800-336-6675. If you payoff by mail, please send it directly to the correct Payoff address above based upon the form of payment being provided and your preferred mailing option (regular or overnight). Please be sure to include your name and account number.



JPMorgan Chase Bank, N.A. Member FDIC. © JPMorgan Chase & Co.

ALC1

Address or Phone Number changing? Changes can be made by signing into chase.com or calling customer service.

Authorization to Convert Your Check to an Electronic Transfer Debit: When you provide a check as payment, you authorize us either to use information from your check to make a one-time electronic fund transfer from your account or to process the payment as a check. Your bank account may be debited as soon as the same day we receive your payment. You will not receive your check back from your institution.

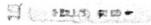
Stay connected with the Chase Mobile® app to pay your bill from a Chase checking account, go paperless, or check your balance and due date. Get the app by texting "mobile" to 24273.

Chase Mobile App is available for select mobile devices. Enroll in Chase Online™ and download the Chase Mobile app. There is no charge from Chase, but message and data rates may apply.

EXHIBIT 4



Account not yet created



Home Shopping Cart Checkout

2019 TAX

SEARCH BY

Enter the search criteria below:

Name: WILLIAMS MADINE A Search
Enter Last Name then space then 1st Initial (example SMITH J) or Business Name (for current, & or -)
All Due Now Balance Due 2019 Payment Records for Year 2020

LEGAL ENTITY: 01 PERSONAL PROPERTY 02 MOTOR VEHICLE 04 OTHER POSSIBLE DUPE

Table with columns: BILL ID, LEGAL ENTITY, PROPERTY CLASSIFICATION, TOTAL DUE, PAID, CANCELED, OPTIONS. Rows include 2014-03-0123367, 2014-04-0123368, 2014-05-0123368.

City of Bridgeport, 1000 N. Main Street, Bridgeport, CT 06610

Powered by: County Data Systems, Inc. ©2019





Contact Us

Help

Search for your Bill

Your reference number includes two letters and six numbers. Please enter only the numbers in the reference field.

Example: Your reference number is AB123456, you would enter 123456 and omit AB.

User Reference Number *

123456



Bill ID: 123456
 Estimated Date: 02/07/2021
 Request Time: 02/07/2021 13:24:11
 Owner Name: WELLS FARGO BANK, N.A.
 Address: 10116 DESSERT TRILEE ST
 LAS VEGAS, NV 891416327

U	Line Item	QTY	UNIT	Price	Amount	Rate	Amount
416110	123456	2014	SV	1,708.84	1,178.89	257.83	2,741.00
416010	123456	2014	OTHER	3.00	0.00	0.00	3.00
442578	123456	2014	SV	350.00	13.10	58.40	414.50
444444	123456	2014	OTHER	2.00	0.00	0.00	2.00
442516	167890	2014	SV	160.00	334.88	104.28	799.17
472445	101234	2014	OTHER	3.00	0.00	0.00	3.00
452713	124567	2015	SV	1,046.50	8,210.78	348.75	13,555.63
474523	123456	2015	OTHER	3.00	0.00	0.00	3.00
494441	123456	2015	SV	1,119.04	7,023.51	285.78	11,627.33
514794	123456	2016	OTHER	3.00	0.00	0.00	3.00

Bill Summary	
Bill Precedent Total	1,290.80
Bill Precedent Total	12,791.15
Bill Fee Total	114.34
Bill Grand Total	14,196.29



EXHIBIT 5

CONSOLIDATION PLUS
 (888)950-4829
 PO BOX 2340
 PHOENIX AZ 85002-2340



Payment Notice

Statement Date: 01/22/2021
 Due Date: 02/09/2021
 Account#: CP0230253
 Name: NADINE WILLIAMS
 Maturity Date: 04/23/2023
 Current Rate: 22.9%
 Current Principal: 21,617.21
 Current Interest: 189.88
 Total Past Due: 0.00
 Total Current Due: 938.42

NADINE WILLIAMS
 10116 DESERT TREES ST
 LAS VEGAS NV 89141-8527

Transactions:

Trans Date	Transaction Amount	Description	Principal	Interest	Other	Principal Balance
01/05/2021		Beginning Balance				21,853.67
01/08/2021	-469.21	Payment	-236.46	-232.75		21,617.21
01/22/2021	-469.21	Payment	-279.33	-189.88		21,337.88
01/22/2021		Ending Balance				21,617.21

Payments Due:

Due Date	Payment Number	Description	Payment Due	Amount Paid	Amount Remaining	Total Due
01/23/2021	74	Principal and Interest	469.21	0.00	469.21	469.21
02/09/2021	75	Principal and Interest	469.21	0.00	469.21	469.21
		Total Amount Due				938.42

We may report information about your account to credit bureaus. Late payments, missed payments, or other defaults on your account may be reflected in your credit report.

11813-23514

01252021

05152021 Loan Statement 2 of 2

REMITTANCE COPY

Statement Date: 01/22/2021
 Due Date: 02/09/2021
 Account#: CP0230253
 Name: NADINE WILLIAMS

Total Past Due: 0.00
 Total Current Due: 938.42

Amount Enclosed: _____

If auto payment is scheduled, please disregard this notice.

NADINE WILLIAMS
 10116 DESERT TREES ST
 LAS VEGAS NV 89141-8527

CONSOLIDATION PLUS
 PO BOX 204791
 DALLAS TX 75320-4791



EXHIBIT

P's Ex 5 001

CONSOLIDATION PLUS
 4940 S WENDLER DR STE 115
 TEMPE AZ 85282
 (888) 950-4829



Payment Notice

Statement Date: 12/26/2017
 Due Date: 01/09/2018
 Account Number: CP0230253
 Name: NADINE WILLIAMS
 Maturity Date: 04/23/2023
 Current Rate: 22.9%
 Current Principal: 34,560.75
 Current Interest: 21.68
 Current Impound: 0.00
 Total Past Due: 0.00
 Total Current Due: 469.21

NADINE WILLIAMS
 10116 DESERT TREES ST
 LAS VEGAS NV 89141 US

Transactions:

Trans Date	Transaction Amount	Description	Principal	Interest	Other	Principal Balance
12/25/2017		Beginning Balance				0.00
12/26/2017		Ending Balance				0.00

Payments Due:

Due Date	Payment Number	Description	Payment Due	Amount Paid	Amount Remaining	Total Due
01/09/2018	1	Principal and Interest	469.21	0.00	469.21	469.21
		Total Amount Due				469.21

We may report information about your account to credit bureaus. Late payments, missed payments, or other defaults on your account may be reflected in your credit report.

10067-5020-6

01022018

DEC2017 LoanStatement2 01

REMITTANCE COPY

Name: NADINE WILLIAMS
 Account Number: CP0230253
 Statement Date: 12/26/2017
 Due Date: 01/09/2018

Total Past Due: 0.00
 Total Current Due: 469.21
 Amount Enclosed: _____

If auto payment is scheduled, please disregard this notice.

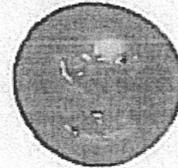
NADINE WILLIAMS
 10116 DESERT TREES ST
 LAS VEGAS NV 89141 US

CONSOLIDATION PLUS
 PO BOX 204791
 DALLAS TX 75320-4791

EXHIBIT 7



**State of Nevada
Department of Motor Vehicles
Vehicle Inspection Report**



OVERALL TEST RESULT: PASS



1GCGC24U61Z125242

VEHICLE INFORMATION

Year: 2001 Make: CHEVROLET Model: SILVER License Plate Number: NVJ889 VIN: 1GCGC24U61Z125242	Cylinders: 8 GVWR Range: HEAVY DUTY >= 6500 Fuel: GASOLINE Motor Home: NO	County: CLARK Zip: 89118 Odometer: 115585 Inspection Type: RETEST
--	--	--

STATION INFORMATION

Station Number: E0046487
Analyzer Number: W1218
Inspector Number: E00000042030

TEST INFORMATION

Test Date: 10/24/2017 17:17:42
DMV ID: 16821145
VIR Number: G14008432
Station Test Fee: \$18.99
VIR Fee: \$8.00
Total Fee: \$18.99

Test results have been forwarded electronically to the Department of Motor Vehicles. Thank you for helping keep our air clean by having your vehicle emission tested. This Emission Test is valid for registration purposes for 90 days upon date of issuance.



ED EXHIBIT

586291-1

P's Ex 7 001

STATE OF NEVADA
DEPARTMENT OF MOTOR VEHICLES
RECEIPT

PRINTED BY: 7891
TRAN EMP ID: 7891
LOCATION: FLAMINGO DMV-LV

DATE: 10/25/2017
TIME: 16:37:18
F Y: 2018

Super Tran Id : 115411098

Completed Transactions

1 SALES TAX ONLY FOR
1GCGC24U81Z125242/ CHEV/ SILVERADO C2500/ 2001/

Fees Date Paid
\$260 84 10-25-2017

Local Governmental FST For Clerk
Registration General Fund FST For Clerk

\$197 80
\$63 24
\$260 84

Total Fees Due

Method of Payment

Payment Type
CREDIT CARD

Payment Number

Paid Amount Date Paid
\$260 84 10 25 2017

Total Fees Paid

\$260.84