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IN THE CIRCUIT COURT FOR PINELLAS COUNTY, FLORIDA
CASE NO. 00-5682-CI-11

DELL LIEBREICH, as Personal
Representative of the ESTATE OF
LISA McPHERSON,

Plaintiff,

vs.

CHURCH OF SCIENTOLOGY FLAG
SERVICE ORGANIZATION, JANIS
JOHNSON, ALAIN KARTUZINSKI
and DAVID HOUGHTON, D.D.S.,

Defendants.

DEPOSITION OF: STACY BROOKS.
DATE: August 15, 2001, 1:35 p.m.
PLACE: JOHNSON, BLAKELY
100 North Tampa Street
Suite 1800
Tampa, FL 33602.
BEFORE: Hon. Robert E. Beach
Senior Circuit Judge.
REPORTED BY: Donna M. Kanabay RMR, CRR,
Notary Public,
State of Florida at large.

2:18:47 PM 1 THE COURT: I've read the three orders and
2:18:50 PM 2 the counterclaim. And based on the three orders and the
2:18:54 PM 3 counterclaim, I think that the inquiry is correct. I'm
2:18:59 PM 4 going to overrule the objection and allow it to proceed.

2:19:05 PM 5 MR. MOXON: Could you read back the question?
2:19:11 PM 6 I'll give it to you again.

2:19:14 PM 7 BY MR. MOXON:

2:19:14 PM 8 Q What was the source of the funds from which the
2:19:16 PM 9 \$600,000 was given to Mr. Minton?

2:19:18 PM 10 A The LMT received \$300,000 from Operation Clambake,
2:19:30 PM 11 and the rest of it came from an anonymous source who I don't
2:19:33 PM 12 know who it was.

2:19:36 PM 13 THE COURT: I'm going to have to move my
2:19:38 PM 14 chair up because I'm really having a hard time hearing.

2:19:43 PM 15 THE DEPONENT: Sorry, your Honor.

2:19:44 PM 16 THE COURT: That's all right. No problem.

2:19:48 PM 17 BY MR. MOXON;

2:19:49 PM 18 Q Was this \$300,000 you say came from an anonymous
2:19:54 PM 19 source?

2:19:55 PM 20 A No. \$300,000 came from Operation Clambake.

2:19:58 PM 21 Q And how much came from an anonymous source?

2:20:00 PM 22 A The rest of it.

2:20:02 PM 23 Q So that's 350,000?

2:20:04 PM 24 A Yes.

2:20:04 PM 25 Q In what form did this \$350,000 come anonymously to

2:20:10 PM 1 LMT?

2:20:14 PM 2 A A wire transfer.

2:20:19 PM 3 Q Did you get any papers on the wire transfer?

2:20:22 PM 4 A No.

2:20:23 PM 5 Q Just suddenly appeared in your account one day?

2:20:29 PM 6 Is that right?

2:20:33 PM 7 A Well, yeah.

2:20:34 PM 8 I mean, what happened was Mr. Minton spoke to some
2:20:38 PM 9 people in Europe and arranged for some contributions.

2:20:45 PM 10 Q What people?

2:20:46 PM 11 A I don't know. I don't know.

2:20:51 PM 12 Q You're the chief financial officer of the company,
2:20:53 PM 13 correct?

2:20:54 PM 14 A Yes.

2:20:55 PM 15 Q It's a for-profit corporation?

2:20:58 PM 16 A In order to protect the sources of our funds, it
2:21:01 PM 17 is a for-profit corporation. But it certainly isn't making
2:21:05 PM 18 any profit. It's supported by donations only.

2:21:10 PM 19 Q You have no idea who the people were that
2:21:12 PM 20 Mr. Minton arranged to receive this money?

2:21:14 PM 21 A No, I don't.

2:21:15 PM 22 And that was part of the terms of the money being
2:21:18 PM 23 received, because they were very afraid of Scientology
2:21:21 PM 24 finding out who they are. They are familiar with
2:21:24 PM 25 Scientology's harassment policies and they didn't want to be

2:21:26 PM 1 known.

2:21:26 PM 2 Q How do you know that?

2:21:26 PM 3 A How do I know that?

2:21:29 PM 4 Q How do you know the feelings of these people?

2:21:32 PM 5 A Bob told me.

2:21:33 PM 6 Q So Mr. Minton knows who they are.

2:21:37 PM 7 A You'd have to ask him.

2:21:38 PM 8 Q You received no paperwork from the bank indicating
2:21:45 PM 9 where this wire came from?

2:21:48 PM 10 A No.

2:21:50 PM 11 Well, it came from a bank in Germany.

2:21:53 PM 12 Q Germany.

2:21:54 PM 13 When did the wire come in?

2:21:55 PM 14 A You'd have to show me the papers that I just gave
2:22:02 PM 15 you.

2:22:06 PM 16 Q I'm handing you back Defendant's Exhibit 11.

2:22:12 PM 17 A In April, I believe.

2:22:18 PM 18 Q April of 2001?

2:22:21 PM 19 A I believe so.

2:22:24 PM 20 Q And then on April 11th, 2001, \$300,000 was
2:22:37 PM 21 transferred to Mr. Minton out of LMT accounts, is that
2:22:41 PM 22 correct?

2:22:41 PM 23 A There was only one account. And I paid him back.
2:22:50 PM 24 He had loaned the LMT money. And when we got that money, I
2:22:56 PM 25 gave it -- I loaned it back -- I mean, I paid it back to

2:22:58 PM 1 him.

2:23:02 PM 2 Q Is there a loan agreement?

2:23:06 PM 3 A Yes.

2:23:06 PM 4 Q A written loan agreement?

2:23:08 PM 5 A No. No, it's not written.

2:23:10 PM 6 Q An oral loan agreement?

2:23:12 PM 7 A Yes.

2:23:12 PM 8 Q How much is the oral loan agreement for?

2:23:17 PM 9 A Well, the agreement is if he loans us money, we'll
2:23:20 PM 10 pay it back to him when we are able to.

2:23:21 PM 11 Q This is an oral agreement between you and
2:23:24 PM 12 Mr. Minton?

2:23:24 PM 13 A Yes.

2:23:25 PM 14 Q How much money did he loan the corporation?

2:23:35 PM 15 A I believe a little bit more than 650,000.

2:23:40 PM 16 Q No one saw fit to put this agreement in writing?

2:23:43 PM 17 A He didn't require it.

2:23:45 PM 18 Q And you didn't require it as the president and
2:23:50 PM 19 chief financial officer of the corporation?

2:23:51 PM 20 A No. I thought it was extremely generous of him to
2:23:56 PM 21 loan us the money.

2:23:58 PM 22 Q Are there any board minutes or any other corporate
2:24:00 PM 23 records indicating the fact of this loan or any
2:24:07 PM 24 circumstances of this loan from Mr. Minton?

2:24:09 PM 25 A No.

2:24:10 PM 1 Q No paper whatsoever?

2:24:12 PM 2 A No.

2:24:13 PM 3 Q When did he loan that money; Mr. Minton?

2:24:17 PM 4 A I don't remember.

2:24:20 PM 5 Q Now, the two other checks that are part of Exhibit

2:24:26 PM 6 11 were both written in March, one on March 19th, one on

2:24:30 PM 7 March 20th, in the amounts of 200,000 and \$150,000. They're

2:24:35 PM 8 signed by you, correct?

2:24:37 PM 9 A Yes.

2:24:37 PM 10 Q Where did this money come from to re -- to give to

2:24:46 PM 11 Mr. Minton?

2:24:50 PM 12 A Well, there have been two things that have

2:24:54 PM 13 happened. One is that 300,000 has come in from Operation

2:24:59 PM 14 Clambake, and the other is that anonymous moneys have come

2:25:05 PM 15 in from people whose name -- who I don't know who they are.

2:25:08 PM 16 So I would have to have -- I would have to look but -- to

2:25:13 PM 17 remember which was which. But that's -- that's basically

2:25:17 PM 18 what happened.

2:25:18 PM 19 Q You're claiming the rest of this money came from

2:25:20 PM 20 what you call Operation Clambake?

2:25:22 PM 21 MR. MERRETT: I'm going to object to the

2:25:24 PM 22 argumentative tone of the question.

2:25:26 PM 23 MR. DANDAR: And object to repetitive.

2:25:28 PM 24 MR. MOXON: Let me rephrase the question.

2:25:30 PM 25 MR. MERRETT: I mean, I think it's

2:25:31 PM 1 inappropriate to ask if she's claiming --

2:25:33 PM 2 MR. MOXON: Let me --

2:25:33 PM 3 THE COURT: Reframe --

2:25:34 PM 4 MR. MOXON: -- rephrase --

2:25:34 PM 5 MR. MERRETT: I'm sorry.

2:25:35 PM 6 THE COURT: Reframe the question.

2:25:36 PM 7 BY MR. MOXON:

2:25:36 PM 8 Q Are you saying, Ms. Brooks -- I'm not quite sure I
2:25:39 PM 9 understand what you're saying. Are you saying that \$300,000
2:25:43 PM 10 went to Mr. Minton from Operation Clambake?

2:25:47 PM 11 A No.

2:25:48 PM 12 Q How much went to Mr. Minton from money you got
2:25:50 PM 13 from Operation Clambake?

2:25:56 PM 14 A Well, approximately that much went to him after I
2:25:59 PM 15 got it from Operation Clambake. Yes.

2:26:02 PM 16 Q How much did Operation Clambake give to LMT?

2:26:07 PM 17 A Approximately \$300,000.

2:26:08 PM 18 Q And you paid all of that out to Mr. Minton.

2:26:11 PM 19 A Most of it.

2:26:11 PM 20 Q You paid out all of the money that you got from
2:26:17 PM 21 the anonymous source to Mr. Minton also?

2:26:19 PM 22 A No.

2:26:19 PM 23 Q How much of that did you keep?

2:26:21 PM 24 A I don't remember.

2:26:25 PM 25 Q How much did you get from this anonymous source?

2:26:30 PM 1 A Approximately 500,000.

2:26:31 PM 2 Q You got 300,000 from Clambake and 500,000 from the
2:26:37 PM 3 anonymous source?

2:26:38 PM 4 A I believe there were more than one source.

2:26:44 PM 5 Q But you got a total of 500,000 from anonymous
2:26:51 PM 6 sources?

2:26:51 PM 7 A Yes.

2:26:51 PM 8 Q Was that all in one transfer?

2:26:53 PM 9 A I don't recall that it was. I'm not sure, though.

2:26:59 PM 10 Q How many transfers were there?

2:27:03 PM 11 A I don't remember really. There may have been two
2:27:07 PM 12 or three, but I'm not sure.

2:27:11 PM 13 Q Was the transfer into your Bank of America
2:27:15 PM 14 account?

2:27:15 PM 15 A Yes.

2:27:16 PM 16 Q What's the account number of the Bank of America
2:27:19 PM 17 account?

2:27:20 PM 18 A I don't believe --

2:27:21 PM 19 MR. MERRETT: I'll object to --

2:27:21 PM 20 A -- I'm required to --

2:27:21 PM 21 MR. MERRETT: -- relevance.

2:27:21 PM 22 A -- answer that.

2:27:23 PM 23 THE COURT: Overruled.

2:27:25 PM 24 MR. MERRETT: Judge, Scientology has a
2:27:26 PM 25 history of engaging in bank fraud with the use of this

2:28:27 PM 1 account with you?

2:28:27 PM 2 A No, I don't.

2:28:28 PM 3 Q Or any information on this account?

2:28:29 PM 4 A No, I don't.

2:28:29 PM 5 Q How many accounts do you have at Bank of America?

2:28:33 PM 6 A One.

2:28:33 PM 7 Q How many accounts do you have at NationsBank?

2:28:36 PM 8 A None.

2:28:37 PM 9 Q None? How many did you have there?

2:28:40 PM 10 A One. NationsBank became Bank of America.

2:28:43 PM 11 Q Is this the same bank the two amounts were given
2:28:50 PM 12 to Mr. Minton from Exhibit 11: NationsBank checks of
2:28:56 PM 13 March 20th and March 19th and the Bank of America transfer
2:28:59 PM 14 of April 11th?

2:29:01 PM 15 A Yes.

2:29:02 PM 16 Q Who is Operation Clambake?

2:29:09 PM 17 A It's a Web site.

2:29:12 PM 18 Q Do you know who controls the Web site?

2:29:19 PM 19 A A man named Andreas Haldal-Lund.

2:29:22 PM 20 Q Was it Mr. Lund that transferred the \$300,000?

2:29:25 PM 21 A I'm not really sure. I just know that it came
2:29:31 PM 22 from Operation Clambake.

2:29:34 PM 23 Q Was it in a check or a wire transfer?

2:29:37 PM 24 MR. DANDAR: Asked and answered.

2:29:38 PM 25 THE COURT: Overruled.

2:29:39 PM 1 A I believe it was a check.

2:29:40 PM 2 BY MR. MOXON:

2:29:41 PM 3 Q What did the check say?

2:29:51 PM 4 A What do you mean?

2:29:52 PM 5 Q Did the check say "Operation Clambake" on it as
2:29:55 PM 6 the name --

2:29:56 PM 7 A I believe so, yeah.

2:29:56 PM 8 Q -- of the payee? Is that correct?

2:30:02 PM 9 A I believe so, yeah. As I recall.

2:30:06 PM 10 Q Who signed the check?

2:30:08 PM 11 A I'm not sure.

2:30:11 PM 12 Q Did you look?

2:30:11 PM 13 A I'm not --

2:30:15 PM 14 THE COURT: You're going to have to speak up,
2:30:17 PM 15 ma'am.

2:30:18 PM 16 THE DEPONENT: I didn't say anything.

2:30:18 PM 17 THE COURT: I can hardly hear you.

2:30:21 PM 18 THE DEPONENT: Okay. I didn't say anything.

2:30:23 PM 19 THE COURT: Well, I --

2:30:24 PM 20 THE DEPONENT: I didn't.

2:30:28 PM 21 BY MR. MOXON:

2:30:28 PM 22 Q Was it a -- is this an unusual event, to get a
2:30:31 PM 23 \$300,000 check into your corporation?

2:30:37 PM 24 A Yes, it is.

2:30:37 PM 25 Q You had no interest or concern as to who provided

2:30:41 PM 1 \$300,000 to your corporation?

2:30:43 PM 2 A I had reason to understand that it should be kept
2:30:49 PM 3 confidential.

2:30:51 PM 4 Q But you had no interest to know who it was as
2:30:54 PM 5 the --

2:30:54 PM 6 A I didn't.

2:30:55 PM 7 Q Were you the chief financial officer and the chief
2:30:58 PM 8 operating officer of the corporation at the time that you
2:31:01 PM 9 received this money?

2:31:02 PM 10 A Yes, I was.

2:31:03 PM 11 Q Was this income?

2:31:09 PM 12 A Yes.

2:31:10 PM 13 Q It's income to the corporation?

2:31:11 PM 14 A Yes.

2:31:11 PM 15 Q Do you know anyone associated with this Operation
2:31:21 PM 16 Clambake other than Andreas Heldal-Lund?

2:31:27 PM 17 A I believe he runs it.

2:31:29 PM 18 Q Do you know anyone else associated with it that --

2:31:32 PM 19 A You know, I don't really know much about it at
2:31:35 PM 20 all.

2:31:43 PM 21 Q Did you ask Mr. Minton where this money came from?

2:31:46 PM 22 A No.

2:31:47 PM 23 Q Did you ask Mr. Minton why --

2:31:50 PM 24 A Mr. Minton didn't know anything about this. This
2:31:52 PM 25 didn't have anything to do with him.

2:31:54 PM 1

Q The Operation Clambake check?

2:31:56 PM 2

A Yeah.

2:31:56 PM 3

Q Who arranged for that?

2:31:58 PM 4

A I was contacted by somebody who said that a

2:32:08 PM 5

donation was coming.

2:32:10 PM 6

Q Who were you contacted by?

2:32:12 PM 7

A A person.

2:32:13 PM 8

Q Who?

2:32:14 PM 9

A Who didn't say who they were.

2:32:17 PM 10

Q Did you know who it was?

2:32:18 PM 11

A No.

2:32:20 PM 12

Q Did you ask who they were?

2:32:21 PM 13

A I didn't.

2:32:27 PM 14

MR. DANDAR: Can I interrupt just for a

2:32:29 PM 15

second, Judge?

2:32:29 PM 16

THE COURT: You may.

2:32:30 PM 17

MR. DANDAR: I just wanted to make sure -- do

2:32:32 PM 18

you realize that that counterclaim is still subject to a

2:32:36 PM 19

motion to dismiss that hasn't been ruled upon?

2:32:38 PM 20

THE COURT: I do.

2:32:39 PM 21

MR. DANDAR: Okay.

2:32:46 PM 22

BY MR. MOXON:

2:32:46 PM 23

Q Did you make any record of your phone call with

2:32:49 PM 24

the anonymous person who --

2:32:50 PM 25

A No, I didn't.

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REPORTER'S DEPOSITION CERTIFICATE


STATE OF FLORIDA)

COUNTY OF PINELLAS)

I, DONNA M. KANABAY, Registered Professional Reporter, certify that I was authorized to and did stenographically report the deposition of STACY BROOKS; that a review of the transcript was requested; and that the transcript is a true and complete record of my stenographic notes.

I further certify that I am not a relative, employee, attorney or counsel of any of the parties, nor am I a relative or employee of any of the parties' attorney or counsel connected with the action, nor am I financially interested in the action.

DATED this 18th day of August, 2001.



DONNA M. KANABAY, RMR, CRR.
Notary Public
State of Florida at large.