

1 A. I seen them in a meeting one night. Danny
2 produced his donations to the lake.

3 Q. And on the front page of Group A, it
4 specifically says, "Relevant time period April 17,
5 2017 until October 13, 2020." Do you understand
6 that the invoices attached herewith are invoices
7 that Mr. Dively asserts that he provided to the
8 board? Do you understand that?

9 A. I understand that, yes.

10 Q. And on this front page here, we have a
11 calculation of \$3,272.01, the total donations in
12 that time period that Mr. Dively and/or Dirt Bottom
13 Excavating made to SVDC. Do you understand that?

14 A. Yes. I would've thought it would be a lot
15 more than that because nobody does more work for
16 the lake than Dirt Bottom.

17 Q. Okay. So. Let's talk about that. Do you
18 feel that that number is actually quite low?

19 A. I think it's very low.

20 Q. But you understand that that number is only
21 from these invoices and it would not include
22 uninvoiced work? Do you understand that?

23 A. I understand that.

24 Q. If you were to make an estimate of how much
25 time and materials that Mr. Dively has donated to



1 SVDC, what would that estimate be?

2 A. \$15,000 to \$20,000.

3 Q. Now, this one invoice paid in the relevant
4 time period \$2,300, do you see that figure?

5 A. Yes, I do.

6 Q. And do you have any reason to believe that
7 that figure is not an accurate figure as far as
8 paid work that Mr. Dively did during that time
9 period?

10 A. That might have covered his fuel.

11 Q. At any point while you were on the board,
12 did you ever witness Mr. Dively steal from the
13 corporation?

14 A. No. Donate to the corporation.

15 Q. Did you ever witness him self-dealing?

16 A. No.

17 Q. I have nothing further.

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19 EXAMINATION

20 BY MR. CASCIO:

21 Q. I just wanted to ask a couple of questions,
22 John. What was your motivation to acquire property
23 in this development? What was the appeal of being
24 a property owner there?

25 A. Part of it was the lot was given to me as