

1 A. I don't know he actually physically
2 worked on it. I know he has addressed that he
3 blocked it open because it was failing. I don't
4 know if he's ever physically did mechanical work
5 on it, but he has participated in helping the
6 situation.

7 Q. Did he do that in the capacity of a
8 public safety diver, do you recall?

9 A. He would have been acting -- I don't know
10 at that point. I was going to say he was going
11 to be acting as a board member, but he officially
12 is a member of the dive team. So I can't
13 remember if that one was -- a donation was given
14 to the dive team and he did it for that. I do
15 recall, as treasurer, that we gave a donation to
16 the dive team.

17 Q. Understood.

18 A. So I assume that would be the same time
19 period.

20 Q. Okay. So we're already clear this \$3200
21 figure is actually very low, obviously, correct?

22 A. Yes.

23 Q. Now, moving on, we have on Group Exhibit
24 A, one invoice paid in the relevant time period,
25 and again we're talking about the April 17, 2017

1 until October 13, 2020 time period.

2 Is there any reason for you to believe,
3 as the treasurer, that that figure is inaccurate?

4 A. No. I do remember seeing that number in
5 QuickBooks.

6 Q. Now, did you ever witness Mr. Dively
7 steal money from SVDC?

8 A. No.

9 Q. Doing the math here, and even on what's
10 been provided, would you agree that Mr. Dively
11 has donated more time and materials which would
12 exceed any money he was ever paid for work that
13 he actually charged for? Would you agree with
14 that?

15 A. I would have to review what he was paid
16 for. I apologize.

17 When I was treasurer, I had access to
18 QuickBooks. I don't remember all those things,
19 what he officially was paid for, what he wasn't.

20 Q. Okay. Now, you also mentioned that
21 during your time on the board, Mr. Dively never
22 voted on any matter in which he would have been
23 doing the work; is that correct? You said he'd
24 abstain from any vote, correct?

25 A. I don't believe all the time he did.

1 Sometimes he would abstain, but I don't know for
2 sure that he abstained every time.

3 Q. Okay.

4 A. As far as people -- I'm sorry. The way
5 you said that, I missed it. So as far as the
6 work, yes, he abstained all the time.

7 His customers getting building permits
8 approval, I don't know that he abstained all the
9 time for that.

10 Physical work, yes, he always abstained.

11 Q. Okay. Thank you.

12 Again, if you can recall, do you recall
13 Mr. Dively or Dirt Bottom Excavating ever doing a
14 job for SVDC that you felt was not for fair
15 market value, meaning, it was for more than fair
16 market value?

17 A. No.

18 Q. You had mentioned earlier that a -- you
19 had initiated a motion to get a boat motor that
20 ended up costing between \$9- to \$10,000, correct?

21 A. Right.

22 Q. At that point when you did that motion,
23 do you feel that was a breach of your fiduciary
24 duties to the corporation?

25 A. I do not.