

1 NO. 052-LH-0207

2 DALLAS INDEPENDENT SCHOOL) BEFORE THE INDEPENDENT

3 DISTRICT,)

4 Petitioner) HEARING EXAMINER

5 VS.) FOR THE STATE OF TEXAS,

6 ARDIS McCANN)

7 Respondent) FREDERICK AHRENS

8

9

10 *****

11 ORAL DEPOSITION OF

12 PETER NIELSEN

13 MARCH 22, 2007

14 *****

15

16

17

18 ORAL DEPOSITION OF PETER NIELSEN, produced as a witness at

19 the instance of the Respondent, and duly sworn, was taken in

20 the above-styled and numbered cause on the 22nd day of March,

21 2007, from 6:05 p.m. to 7:27 p.m., before Melissa Spivey, CSR

22 in and for the State of Texas, reported by machine shorthand,

23 at the offices of the Dallas Independent School District, 3700

24 Ross Avenue, Dallas, Texas, 75204, pursuant to the Texas Rules

25 of Civil Procedure.

A P P E A R A N C E S

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

FOR THE PETITIONER:
MR. D. CRAIG WOOD
WALSH, ANDERSON, BROWN, SCHULZE & ALDRIDGE, P.C.
P.O. BOX 460606
SAN ANTONIO, TEXAS 78246-0606

MS. SANDRA D. CARPENTER
WALSH, ANDERSON, BROWN, SCHULZE & ALDRIDGE, P.C.
P.O. BOX 168046
IRVING, TEXAS 75016-8046

FOR THE RESPONDENT:
MR. DANIEL A. ORTIZ
ORTIZ & ASSOCIATES
715 WEST ABRAM STREET
ARLINGTON, TEXAS 76013

MR. SHANE GOETZ
LAW OFFICE OF SHANE GOETZ
715 WEST ABRAM STREET
ARLINGTON, TEXAS 76013

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

INDEX

PAGE

Appearances

2

WITNESS: PETER NIELSEN

EXAMINATION BY MR. ORTIZ

4

Signature and Changes
Reporter's Certificate

46
48

EXHIBITS

NO. DESCRIPTION

PAGE

20 DISD Procurement Card Investigation
Transactions For McCann, Ardis L.

28

20A Color copy of DISD Procurement Card
Investigation Transactions For McCann, Ardis
L.

45

REQUESTED INFORMATION

PAGE LINE

The number of new receipts included in Exhibit
19

44 20

1 PETER NIELSEN,
2 having been first duly sworn, testified as follows:

3 EXAMINATION

4 BY MR. ORTIZ:

5 Q. Sir, state your name for the record, please.

6 A. Peter David Nielsen.

7 Q. Mr. Nielsen, my name is Daniel Ortiz. Until about
8 30 minutes ago, you and I had never met; isn't that correct?

9 A. That's correct.

10 Q. We're here to take your deposition. Have you ever
11 given a deposition before?

12 A. Yes, sir.

13 Q. About how many times?

14 A. Twice.

15 Q. When is the last time?

16 A. 1999, 2000 perhaps.

17 Q. And for the record, it's out-of-court testimony
18 taken under oath. If you don't understand anything I ask you,
19 let me know, okay?

20 A. Okay.

21 Q. Otherwise, I'll assume that you have understood the
22 question. I don't anticipate this taking very long; but if you
23 need to take a break, let me know.

24 A. Thank you.

25 Q. Finally, if you can, verbalize your responses,

1 please. Everything's being transcribed, okay?

2 A. Thank you.

3 Q. What do you do for a living?

4 A. I'm a private investigator.

5 Q. For who?

6 A. Myself.

7 Q. How are you connected with the procurement card
8 investigation at the Dallas Independent School District?

9 A. I was hired by the Fish & Richardson law firm to
10 assist them in conducting their investigation for the district.

11 Q. When were you hired?

12 A. September 13th or 14th of 2006.

13 Q. Where do you office out of?

14 A. My home.

15 Q. Where?

16 A. Rockwall.

17 Q. Where?

18 A. 2016 Hebron Circle in Rockwall.

19 Q. Other than this investigation -- and let's call it
20 the p-card investigation at Dallas Independent School District.
21 Is that fair enough?

22 A. Yes.

23 Q. Other than this p-card investigation, have you ever
24 worked with this Fish law firm?

25 A. No.

1 Q. And if you know, how did they contact you -- or
2 rather, how was it that they found out about you?

3 A. I sent them a resume.

4 Q. And were they advertising?

5 A. No. I read about the investigation in the newspaper
6 and that Fish & Richardson was going to conduct the
7 investigation, had been hired by the district to do so. And I
8 know Mr. Coggins and I know Ms. Johnson, Ms. Madeleine Johnson,
9 from the United States attorney's office; and I sent them a
10 resume.

11 Q. And they hired you?

12 A. Sir?

13 Q. And they hired you?

14 A. Yes, sir.

15 Q. Are you paid a salary?

16 A. No, hourly wage.

17 Q. How much an hour?

18 A. \$100.

19 Q. About how many hours have you expended in this
20 investigation?

21 A. I've worked this case full-time since about the 15th
22 of September.

23 Q. So 40, 50, 60 hours a week, how many hours a week?

24 A. Probably 40 or 50.

25 Q. For every week since then?

1 A. Sir?

2 Q. For every week since then?

3 A. Yes, sir.

4 Q. What was your role in connection with this
5 investigation? Or let me reask that. What is your role in
6 connection with this investigation?

7 A. The p-card investigation --

8 Q. Yes.

9 A. -- or Mr. McCann?

10 Q. This p-card investigation.

11 A. To -- primarily to conduct a forensic review of the
12 receipts for anything that I may note as important to the
13 investigation, interview people involved in the investigation.

14 Q. And what do you mean primarily to take a forensic
15 review of the receipts?

16 A. Examine them and compare them to statements, bank
17 statements.

18 Q. When did Mr. McCann -- when did you begin reviewing
19 Mr. McCann?

20 A. His receipts?

21 Q. Yeah.

22 A. I want to say January 31st of 2007.

23 Q. And when did you complete your review of Mr.
24 McCann's receipts?

25 A. May I look at the case reports that we did?

1 Q. Yeah. Sure. Sure. I'll show it to you.

2 A. Okay.

3 Q. When did you first interview Mr. McCann? Let me
4 show you something here, okay, to help you on these dates. Let
5 me show you what's marked Exhibit 4, and tell me what this
6 document is.

7 A. This is what Fish calls an interview protocol and it
8 advises, in this case Mr. McCann, of his -- of his rights. And
9 the date of the interview is the 15th, and that was the first
10 time --

11 Q. The 15th?

12 A. November 15th, '06.

13 Q. And that was the first time what?

14 A. That wasn't the first time that I had met Mr.
15 McCann, but that was the interview that I did with Mr. McCann.

16 Q. Was that the first time you met Mr. McCann?

17 A. No. I didn't know until Mr. McCann walked in the
18 door at this interview, but I had met him some period of time
19 later very briefly -- or earlier -- I'm sorry -- sometime
20 earlier briefly.

21 Q. When?

22 A. It was a result of this investigation. I went to
23 his school to contact a teacher and observe and inspect the
24 property that he had purchased with the p-card. And in doing
25 so, I always meet with the principals first and let them know

1 that I'm on their campus. And that's when I met Mr. McCann. I
2 didn't realize who he was until --

3 Q. So November 15th, 2006 is the first time and only
4 time you interviewed Mr. McCann; is that correct?

5 A. That is correct.

6 Q. Had you reviewed anything about Mr. McCann prior to
7 November 15th, 2006?

8 A. No, sir.

9 Q. And you testified a bit ago that you first began
10 reviewing Mr. McCann's receipts -- I think you said January 30,
11 2007; is that correct?

12 A. 31st.

13 Q. Of January?

14 A. Yes, sir.

15 Q. So then before November 15th, 2006, at the time you
16 interviewed Mr. McCann, what, if anything, had you reviewed
17 concerning Mr. McCann?

18 A. Nothing.

19 Q. Tell me about this interview.

20 A. I assisted Mr. Mendrygal in interviewing Mr. McCann.
21 Based on my observations during the interview, I became aware
22 that Mr. McCann was missing a large portion of his receipts.
23 Of course, the receipts I'm speaking of relate to p-card
24 purchases. And Mr. Mendrygal informed Mr. McCann of the fact
25 that he was missing a large portion of his receipts. Mr.

1 McCann acted surprised and indicated that he didn't think he
2 was missing his receipts and that perhaps we had lost them.

3 Q. Was this interview audio-taped?

4 A. No.

5 Q. Did Mr. Mendrygal take the lead in this interview?

6 A. Yes, sir.

7 Q. So apparently Mr. Mendrygal had reviewed something
8 about Mr. McCann prior to this interview; is that correct?

9 A. I would say so, yes, sir.

10 Q. And anything else significant about this interview
11 that you can recall other than everything you've already told
12 me?

13 A. At the time we went through the interview
14 protocol -- it's a list of questions that we ask everybody -- I
15 do remember Mr. McCann saying no one else used his p-card, that
16 he didn't allow anyone else to use his p-card. I do remember
17 him saying that there were -- either his office manager or his
18 financial assistant were allowed to use the number to make
19 telephone orders, but no one was allowed to use the card. Mr.
20 Mendrygal gave him a copy of what I, for lack of a better term,
21 called transaction report which is a list of the p-card
22 expenditures that Mr. McCann has made and asked him to please
23 do what he could to provide the receipts that were missing.

24 Q. Let me show you, sir, what's marked Exhibit 8. And
25 I have questioned Mr. Mendrygal at length about this document,

1 so I understand it fairly well. Let me ask you, this
2 transaction report, is that the document that's attached to
3 Exhibit 8 -- yeah, don't tear it apart, please.

4 A. Sorry.

5 Q. -- that's marked Exhibit B?

6 A. Yes, sir.

7 Q. And Exhibit B is a document that Mr. Mendrygal gave
8 to Mr. McCann at this November 15th interview?

9 A. Yes.

10 Q. And said at the end of this interview, go find the
11 missing receipts or --

12 A. Something to that effect.

13 Q. -- or something to that effect?

14 A. Yes.

15 Q. And then, of course, Exhibit A is the same document
16 we looked at a bit ago, this interview protocol; is that
17 correct?

18 A. I'm not finding A. I'm sorry. Yes. Yes, that's
19 it.

20 Q. After November 15th, 2006 -- and for the record,
21 sir, you and I and Ms. Carpenter met off the record immediately
22 before this deposition, did we not?

23 A. Yes, sir.

24 Q. And I'm trying to remember the best I can the
25 chronology you gave me. If I misspeak here, it's because I

1 wasn't taking notes, okay?

2 A. Yes, sir.

3 Q. But is it fair to say that sometime within five days
4 or so of this November 15th, 2006 interview, that Mr. McCann
5 brought in something and met briefly with Mr. Mendrygal and/or
6 you? It wasn't a planned meeting, but it was a very brief
7 conference; is that correct?

8 A. Yes.

9 Q. Tell me about that.

10 A. That is -- we had other interviews scheduled. We
11 met with Mr. McCann briefly, and that's when -- that is when
12 Mr. Mendrygal gave him this transaction report.

13 Q. And this transaction report, the one marked Exhibit
14 B?

15 A. Yes, sir.

16 Q. And did that brief meeting occur about two, three,
17 five days after that November 15th meeting?

18 A. Honestly, I don't recall exactly how far after.

19 Q. Fine. And what happens next in this chronology as
20 it relates to Mr. McCann? Is it, if I remember correctly, that
21 a notebook showed up?

22 A. Yes, sir.

23 Q. Tell me about that.

24 A. I can only tell you what I've heard because I wasn't
25 involved in it yet at that point.

1 Q. Okay. Fine.

2 A. But I heard that a notebook had showed up in legal
3 and -- Mr. McCann had dropped off a notebook and that it was
4 supposed to have additional receipts in it. It was in response
5 to our request to go forth and try to find additional receipts.

6 Q. And let me stop you. And about when did you first
7 learn of this notebook showing up in legal?

8 A. I'm trying to preface it with when I actually
9 started working on it -- on the receipts. In January perhaps.
10 That's the best I can do.

11 Q. January of '07?

12 A. Yes, sir.

13 Q. And how did you learn of this notebook?

14 A. I overheard Mr. Mendrygal talking with the paralegal
15 from Fish & Richardson, Amalia Macias.

16 Q. And when you said that the notebook was delivered to
17 legal, you mean the legal department at Dallas Independent
18 School District, do you not?

19 A. Yes, I do mean that.

20 Q. And you understand that's a notebook that Mr. McCann
21 delivered, do you not?

22 A. That's what I believe occurred, yes.

23 Q. And then in this chronology, what happens next?

24 A. I hear that -- from Mr. Mendrygal that there's no
25 substantial change in the amount of receipts and that the

1 material in the blue binder was a repeat of what we had already
2 seen and there was very little, if any, new information.

3 Q. And this blue binder is this notebook that showed up
4 in legal that you just talked about?

5 A. Yes, sir.

6 Q. What happens next in the chronology with respect to
7 these missing receipts?

8 A. The -- what happens then is a report is prepared and
9 submitted to the district -- a report is prepared by Mr.
10 Mendrygal, it's submitted to the district, it is reviewed by,
11 for lack of a better term, the disciplinary review committee.
12 And then I don't become involved or know anything more about
13 this until about the 9th of January when Mr. Mendrygal -- on or
14 about that time when Mr. Mendrygal asked me to interview Maggie
15 Condren, a/k/a Maggie Phillips.

16 Q. We'll talk about Maggie in just a minute.

17 A. Okay.

18 Q. This report that you just made reference to, the one
19 that Mr. Mendrygal prepared, is that the report marked Exhibit
20 No. 8, the one you have in front of you?

21 A. Yes, sir.

22 Q. And Mr. Mendrygal and you presented this report to
23 the superintendent's ad hoc committee -- ad hoc legal review
24 committee; is that correct?

25 A. Mr. Mendrygal presents. I'm there to answer any

1 questions.

2 Q. And he presented this December 18th, '06 report; is
3 that correct?

4 A. Yes, sir.

5 Q. And he presented this report only once to this
6 committee, did he not?

7 A. That I know of, yes, sir.

8 Q. And was that December, January, February?

9 A. I think it was in January, but I'm not certain.

10 Q. Would it have been, if you know, sometime
11 immediately before this January 9th interview with Maggie or
12 sometime after January?

13 A. It would have been before.

14 Q. Tell me about this presentation Mr. Mendrygal made
15 to the superintendent's ad hoc legal review committee, the one
16 he presented this December 18th, '06 report. Who was there?

17 A. Who was in attendance? Dr. Peace.

18 Q. Steve Flores?

19 A. Steve Flores.

20 Q. Eric Anderson?

21 A. Eric Anderson and there's -- I don't know the other
22 lady, Collier.

23 Q. Dr. Collier?

24 A. Dr. Collier.

25 Q. Was Derrell Coleman there?

1 A. Derrell is in and out at those meetings.

2 Q. Was Luis Tamez there?

3 A. Yes.

4 Q. Was Bruce Weaver there?

5 A. Again, Bruce is in and out; but I think he was there
6 that day.

7 Q. Was some unnamed Hispanic female, a secretary to
8 somebody?

9 A. Yes.

10 Q. Who is she?

11 A. I don't know.

12 Q. Did you or Mr. Mendrygal recommend the sanction that
13 should be doled out to Mr. McCann either at this meeting or at
14 any other time?

15 A. No, sir.

16 Q. Why not?

17 A. It's not our place and we're not asked.

18 Q. Did you or Mr. Mendrygal tell this committee at this
19 meeting anything different than what's presented in writing in
20 this December 18th report?

21 A. No, sir.

22 Q. How many presentations did you make to this -- did
23 you or Mr. Mendrygal make to this committee about Mr. McCann
24 other than this one that occurred sometime between January 1
25 and January 9, 2007?

1 A. That's the only one I know of.

2 Q. So this early January presentation is the only time
3 you remember you and/or Mendrygal making a presentation or even
4 discussing Mr. McCann to the superintendent's ad hoc legal
5 review committee?

6 A. That's correct.

7 Q. And now you understand, of course, based upon that
8 presentation, that this committee recommended termination, do
9 you not?

10 A. I know that, yes.

11 Q. Do you know whether this committee's recommended
12 termination of any other employee of this district?

13 A. I do.

14 Q. Who is that?

15 THE WITNESS: Am I entitled to talk about
16 that? Is that an attorney-client issue or not?

17 MR. WOOD: You can answer that.

18 Q. (BY MR. ORTIZ) Well, are you an attorney?

19 A. No.

20 Q. So attorney-client privilege, what are you talking
21 about?

22 A. I have a requirement to adhere to that because I
23 work for the law firm and the law firm works for the district.
24 So I believe that that same attorney-client privilege extends
25 to the work that I do and prevents me from making any

1 unauthorized disclosures.

2 Q. Will you answer the question?

3 A. I did.

4 Q. Answer the question. Who else did this committee
5 recommend termination?

6 A. I know of Mr. Dwain Govan, Ms. Katonya Smith and Ms.
7 Charlenta Govan. Those are the only ones I know of.

8 Q. How about Sherri Brokaw?

9 A. I don't know about that.

10 Q. Is it fair to say in your opinion that the primary
11 concern you and Mr. Mendrygal had about Mr. McCann is that he
12 only had 42 percent of his receipts?

13 A. That was my initial concern. That's not my primary
14 concern.

15 Q. What is your primary concern?

16 A. My primary concern was that Mr. McCann was deceptive
17 about these receipts and their status when we interviewed him.
18 I don't think he was truthful with me when we interviewed
19 him -- or when Mr. Mendrygal interviewed him.

20 Q. So you think he's a liar?

21 A. I do.

22 Q. Well, tell me each and every reason you believe Mr.
23 McCann's a liar.

24 A. When we talked to him at his interview --

25 Q. In this November 15th, '06 interview?

1 A. Yes. That's the only time I've spoken to him -- he
2 gave us the impression that he was very surprised about the
3 fact that receipts were missing, that it didn't seem possible
4 to him and it's likely that we had lost them, we being the
5 district or perhaps us. I didn't distinguish that. At the
6 time, I was concerned only because I'm always concerned when
7 receipts are missing.

8 After hearing that Mr. McCann had turned in another
9 notebook which didn't have any substantially different
10 information in it or provide us with any more documentation of
11 the purchases for which he didn't have receipts, it concerned
12 me again a little bit more as an investigator.

13 Q. About deception and about McCann continuing to lie?

14 A. Yes. Yes.

15 Q. Tell me how.

16 A. Well, it's always of a concern to me when people
17 don't document or at least attempt to explain and document
18 their transactions in this investigation. Not having looked at
19 the blue binder but hearing that it had made no substantial
20 change, I was concerned about it; but I was not yet involved in
21 the investigation to any great degree.

22 Q. And have you shared with me each and every reason
23 you believe that your primary concern about McCann is that he's
24 a liar?

25 A. No. I have another major issue that caused me great

1 concern with Mr. McCann.

2 Q. As to deception?

3 A. Yes.

4 Q. Well, tell me about that.

5 A. It's when I interviewed Maggie Condren or Maggie
6 Phillips --

7 Q. On January 9th?

8 A. -- on January 9th of 2007.

9 Q. Uh-huh.

10 A. I interviewed her. She told me that she was Mr.
11 McCann's manager -- business manager for a period of time and
12 that he kept very, very good receipts and that he tracked all
13 his expenses and that they had -- the message was that he had
14 done a good job.

15 And then she also indicated to me that she had
16 received several telephone calls, no less than ten were her
17 words, telephone calls from Mr. McCann asking her if she could
18 help him find his receipts or knew anything about his missing
19 receipts and that he had been frantically -- basically
20 frantically trying to find them since August when the
21 superintendent had called for all the employees to turn in
22 their receipts and that he continued those calls between August
23 and December 31st of '06 according to Ms. Condren. That
24 concerned me greatly.

25 Q. Why?

1 A. Because Mr. McCann told us that he hadn't lost any
2 receipts and that we probably had lost them and he had turned
3 them all in, and that's a lie. He hadn't if one's to believe
4 Ms. Condren.

5 Q. Now, as we sit here today, what is your knowledge
6 about whether Mr. McCann has turned in additional receipts?

7 A. I do know he has turned in additional receipts, yes,
8 sir.

9 Q. And do you also know that these additional receipts
10 total at least 85, 90 percent of the total outstanding
11 transactions?

12 A. Yes, sir, I do know that.

13 Q. Do you still think Mr. McCann's a liar?

14 A. Yes, sir.

15 Q. Tell me each and every reason that you believe he's
16 a liar as it relates to these missing receipts and/or
17 newly-found receipts.

18 A. On January 31st, I received instructions from Mr.
19 Mendrygal to go to the human resources building and recover a
20 box of documents that I was told was delivered by Mr. McCann.
21 I went and picked up that box of documents, and I looked on --
22 written on the box is a date, and it -- the date was January
23 27th, 2007 and something to the effect that found at Spruce
24 High School, the documents were found at Spruce High School.

25 And inside the box are 1,745 Bates numbered

1 documents that were represented to me to be receipts that Mr.
2 McCann had found. I -- based on that alone, I had some
3 concerns because there was a notation there on an attorney's
4 business card that indicated the attorney had the originals if
5 I needed them for examination.

6 Inside the box were photocopies of many documents to
7 include some receipts. That concerned me because Mr. McCann
8 said on the 15th of November that he, in fact, had turned in
9 all his documents including his original receipts. Well, if he
10 turned them in, I was confused as to how he could have -- how
11 his attorney had them. So again, I was troubled by Mr.
12 McCann's truthfulness with that.

13 As I examined the documents, I was again a bit
14 concerned with Mr. McCann because there -- in my estimation --
15 and I counted as many as I could or that I could find. I
16 didn't find more than 250 receipts in there that were not
17 previously provided. In other words, there was only 250
18 documents of receipts -- copies of receipts that were new
19 information.

20 The remaining 1,500 or so documents was garbage. It
21 had nothing to do with the p-card investigation, it had nothing
22 to do with receipts and some of it was -- much of it we had
23 already seen. And it -- in my opinion, it was just garbage.
24 There wasn't a need to turn in 1,745 documents.

25 Q. What's significant in your mind about these over

1 1,500 documents of, as you characterize, garbage?

2 A. What's the significance of that?

3 Q. Yeah.

4 A. I think that it was just a way of hoping that I
5 wouldn't examine all of them.

6 Q. So you believe it was Mr. McCann's attempt to be
7 further deceptive?

8 A. Yes, sir, I do.

9 Q. And, like, he gave you 1,700, 1,800 documents only
10 250 of which were, like, new material documents to these
11 missing receipts hoping that you would just characterize all of
12 them as being missing receipts?

13 A. I think that's fair, yes, sir.

14 Q. Did you ever talk to him about that?

15 A. No, I didn't.

16 Q. Why not?

17 A. I -- there was no further interviews scheduled at
18 that time.

19 Q. Why?

20 A. The reason I didn't talk to him was because Mr.
21 Mendrygal sets up those interviews and --

22 Q. He didn't set it up?

23 A. -- he didn't set up an interview so...

24 Q. But wouldn't it have been nice had someone set up an
25 interview and you asked Mr. McCann about this box and about

1 these concerns of yours?

2 MR. WOOD: Objection; form.

3 Q. (BY MR. ORTIZ) Sir, answer that.

4 A. I don't consider it nice or not. When we spoke with
5 Mr. McCann on November 15th, I gave him a business card, my
6 business card. It had a cell phone number on it, it had my
7 home address on it. I told him if he had any questions, he
8 needed any assistance, he could call me at any time and I would
9 do what I could do to assist him in satisfying this issue. I
10 never heard from Mr. McCann. To this day, I've never heard
11 from Mr. McCann.

12 When I went over and picked up the documents on
13 January 31st, there was an attorney's business card on there.
14 The only question I would have had for Mr. McCann at that time
15 was why didn't he tell us that he hadn't turned these receipts
16 in in the first place. And quite frankly, I'm not sure any
17 attorney would have allowed him to answer that so...

18 Q. So you don't think that an interview with Mr. McCann
19 after January 31, 2007 about this box of documents would have
20 been any assistance to you one way or the other?

21 A. It wouldn't have been any assistance to me. My work
22 was done. It was to determine what level of receipts were
23 turned in. I reported that. And unless I'm given further
24 leads by either Mr. Mendrygal or the review committee, I move
25 on to another case.

1 Q. Your work is done. Your work in connection with Mr.
2 McCann was to determine how many receipts he turned in?

3 A. Those were the instructions I was given, yes, sir.

4 Q. And of this box that you received January 31, 2007,
5 you acknowledge that he turned in an additional 250 new
6 receipts?

7 A. Approximately, yes, sir.

8 Q. Did he ever turn in any additional receipts?

9 A. Yes, sir.

10 Q. When was that?

11 A. There was an envelope turned in to legal -- it was
12 date stamped the 22nd.

13 Q. Of February?

14 A. February. Yes, sir, February.

15 Q. Okay. And tell me about those documents.

16 A. Those documents were more copies of original
17 receipts. There was letterhead in there from an attorney
18 indicating that he had the originals if I needed them.

19 Q. Okay.

20 A. It was a -- it was very well organized, there were
21 statements -- monthly statements with the receipts justifying
22 or documenting the expenditures by statement. There was no
23 garbage in the package.

24 Q. What significance is that?

25 A. Well, I -- the significance to me is that I think

1 the deception stopped.

2 Q. Stopped when you received this lawyer's letter and
3 this organized set of documents?

4 A. Yes.

5 Q. And how many additional new receipts did you receive
6 at that time?

7 A. I don't know without looking at my notes exactly how
8 many additional receipts there were in that transmission of
9 documents. I just know that totally -- I just recall that
10 totally all of the receipts submitted collectively added up to
11 about 85 percent.

12 Q. What notes are you talking about?

13 A. I have an investigative work paper I use with this
14 transaction report, and I make notations on it as I do my
15 examination of my receipts.

16 Q. Well, I want a copy.

17 A. Okay.

18 MR. WOOD: Counsel, you have a copy. We
19 produced that in our production.

20 MS. CARPENTER: It's the highlighted -- is it
21 the one -- we produced a copy of the one with the highlighted
22 exhibits. That's what you're talking about?

23 MR. WOOD: Yeah, with the etchings.

24 THE WITNESS: That's the one I'm talking
25 about, the one with the etchings.

1 MR. WOOD: Mr. Ortiz, it's this one here.

2 MR. ORTIZ: What's it Bates stamped?

3 MR. WOOD: AM 00096.

4 MS. CARPENTER: It's Exhibit 8.

5 MR. WOOD: I left out a zero, four zeros and
6 96.

7 MR. ORTIZ: Exhibit 8, okay. It's one of the
8 exhibits?

9 MR. WOOD: Yeah.

10 Q. (BY MR. ORTIZ) Sir, in front of you, Exhibit 8, are
11 these your notes, part of Exhibit B? I'm just trying to find
12 out in this --

13 A. This isn't the transaction report I'm talking of,
14 speaking of.

15 MR. WOOD: It's a different document?

16 THE WITNESS: It's the same document but my
17 etchings are on it.

18 MR. WOOD: The issue is, Mr. Ortiz, the
19 original document that he made his etchings on are -- some of
20 them are different colors, so they don't reflect when you
21 photocopy it.

22 MR. ORTIZ: So I need to see the original I
23 guess.

24 MR. WOOD: Yeah.

25 Q. (BY MR. ORTIZ) Do we have an original?

1 A. Yes, sir.

2 Q. Where is it?

3 A. Upstairs in the evidence room.

4 MR. ORTIZ: If you made a color copy, wouldn't
5 that work?

6 MR. WOOD: If they're distinct enough that the
7 photocopier would pick them up because as you see, the
8 highlighting doesn't necessarily copy well. And correct me if
9 I'm wrong, Mr. Nielsen, but there are some red etchings, some
10 blue etchings, some black brackets and some yellow
11 highlighting. And some of that is evident from the copy that's
12 made here, but obviously it doesn't translate well through the
13 copying machine.

14 THE WITNESS: That's correct. That's what's
15 on my report, those colors.

16 Q. (BY MR. ORTIZ) Do you have access to this report
17 now?

18 A. Yes.

19 Q. How long will it take to get --

20 MR. ORTIZ: Or here, let's go off the record.

21 (Recess; 6:42-6:59.)

22 (Exhibit No. 20 marked.)

23 Q. (BY MR. ORTIZ) Sir, let me show you what's marked
24 Exhibit No. 20. And tell me, this is a very similar document
25 but not exactly the same document as is marked Exhibit B

1 attached to Exhibit 8; is that correct?

2 A. That's correct.

3 MR. ORTIZ: Sandra, let me step around so I
4 can overlook his so maybe I can speed it along.

5 Q. (BY MR. ORTIZ) Tell me what's different about
6 Exhibit 20.

7 A. Without going transaction by transaction, what's --

8 Q. Now, excuse me for interrupting. Now, for the
9 record, what's marked Exhibit 20, this document up here is a
10 copy of this original document you're looking at which is
11 actually highlighted; is that correct?

12 A. Yes.

13 MR. ORTIZ: Now, Counsel, I need an actual
14 duplicate of the same highlighted document he's looking at. In
15 fact, I want this one marked Exhibit 20.

16 MS. CARPENTER: I'm not sure I'm following
17 you. You want his color copy, his original marked?

18 MR. ORTIZ: I want the color copy, and I
19 suggest that we mark that 20 or 20A or something. Have you
20 provided --

21 MS. CARPENTER: I was going to say, let me --
22 I'm sorry. May I be real clear on the record? You're wanting
23 a color copy of what was recently marked as Exhibit 20 just a
24 few minutes ago and submit it?

25 MR. ORTIZ: Yes.

1 MS. CARPENTER: You want a color copy that we
2 will agree to mark Exhibit 20A?

3 MR. ORTIZ: Yes.

4 MS. CARPENTER: And you understand that this
5 document was not produced originally to you as a part of the
6 request for production because it was not originally produced
7 to Walsh, Anderson --

8 MR. ORTIZ: Until when?

9 MS. CARPENTER: -- in response to our request
10 for original production. Prior to -- at no time prior to the
11 deadline for submission of the response to production.

12 MR. ORTIZ: We'll certainly object to the
13 introduction of this document into evidence because of the
14 district's failure to timely produce it, but this is the
15 deposition. I need to ask him questions about it reserving all
16 of my objections to it.

17 Q. (BY MR. ORTIZ) So let me ask you again, what's
18 different about Exhibit B, Exhibit B attached to Exhibit 8 and
19 Exhibit 20?

20 A. The difference is that Exhibit 8 --

21 Q. Exhibit B attached to 8?

22 A. Exhibit -- yes, sir, Exhibit B attached to 8 is a
23 dated document that was submitted to Fish & Richardson sometime
24 before December 18th of 2006.

25 Q. Okay. And Exhibit 20?

1 A. Exhibit 20 is a document that has symbols and
2 etchings that I made to record the receipt of additional
3 documents submitted by Mr. McCann after --

4 Q. After January 30th?

5 A. Yes, sir.

6 Q. And we had gotten to the point, sir -- and I may not
7 have the dates right here -- but that he submitted two
8 additional sets of documents, one on or about January 31, 2007;
9 is that correct?

10 A. Yes, sir.

11 Q. And then another set through the lawyer's letter
12 February 15th, 2007?

13 A. Yes, sir.

14 Q. And the January 31 set is the box that was
15 unorganized and had over 1,700 documents only 250 of which were
16 actually new receipts; is that correct?

17 A. They were photocopies of new receipts, yes, sir.

18 Q. And the February 15th set was a very organized set
19 of documents?

20 A. Yes, sir.

21 Q. That the organization caused you to believe that Mr.
22 McCann had stopped lying?

23 A. Yes, sir.

24 Q. And tell me how on Exhibit 20 that you record the
25 set of documents produced January 31 and the set of documents

1 produced on or about February 15th.

2 A. In looking at Exhibit 20, there are straight hash
3 marks -- you don't have them in color.

4 Q. Right. You're looking at Page 11 of Page 37,
5 correct?

6 A. Yes.

7 Q. And the blue hash marks off to the left of the third
8 column; is that correct?

9 A. Yes, sir.

10 Q. What does that indicate?

11 A. That indicates additional records that were
12 submitted.

13 Q. From which delivery?

14 A. That is going to be the delivery of the January 31st
15 records.

16 Q. So all of the blue hash marks indicates delivery of
17 the January 31 production; is that correct?

18 A. Yes, sir.

19 Q. And how do you indicate the February 15th
20 production?

21 A. There is -- let me find one here. For example, on
22 Page 17 of 37 --

23 Q. Uh-huh. Yes, sir.

24 A. -- there is an inked bracket in letters.

25 Q. At the bottom of --

1 A. The page. It says -- my notation also says, okay
2 with 2/15 records submission. All the bracketed transactions
3 or all the bracketed -- yes, all the bracketed transactions
4 indicate that they were the records submitted in the 2/15
5 submission except for the red circles with star lines inside.

6 Q. And what does that mean?

7 A. That indicates to me that in that batch of
8 documents, those transactions -- in that batch of 2/15
9 records --

10 Q. Yes, sir.

11 A. -- those receipts are still missing.

12 Q. Now, let me ask you this question and let me ask it
13 slowly because I'm not trying to trick you. I'm just trying to
14 save us some time. It is now after 7:00 p.m. Have you told me
15 all the differences now between this document marked Exhibit 20
16 and the one originally marked Exhibit B which is attached to
17 Exhibit 8?

18 A. On Page 1 of 37 --

19 Q. Yes, sir.

20 A. -- on Exhibit B -- or 20 -- on Exhibit 20 --

21 Q. Yes, sir.

22 A. -- there are red writings.

23 Q. Yes, sir.

24 A. Those are Mr. Mendrygal's calculations. That is not
25 present on --

1 Q. On Exhibit B?

2 A. -- on Exhibit B of December 18th.

3 Q. And looking at Page 1 of 37 on Exhibit 20, read that
4 for us, please. Or do you understand what these notes are?

5 A. I don't know what that symbol is. These are Mr.
6 Mendrygal's etchings that indicate the year. For example, the
7 year 2003, 2004, 2005/2006 and --

8 Q. See --

9 A. I have not gone over these transactions -- these
10 etchings with him, but it looks to me like these are his
11 calculations of the totals that I gave him.

12 Q. I'm trying to understand his notes because I wasn't
13 aware of this document at the time I took his deposition
14 earlier, and I really don't want to have to retake his
15 deposition. So do you know what these notes of his mean? For
16 instance, the last line says, 2005/2006 - 808 OK. What does
17 this document mean or this note mean? Does that mean that Mr.
18 McCann has now produced 808 receipts of the 835 transactions?

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

20 Q. I'll have to ask him that. This next line that says
21 2004 -- read that for me, please. Almost all missing, is that
22 what that says?

23 A. Where are you?

24 Q. Or can you read it? Sir, no, I'm asking you if you
25 can read this note here.

1 A. I can only see all -- or almost all -- 2004 - almost
2 all. I don't know what that word is.

3 Q. And 2003 - looks okay?

4 A. Looks okay.

5 Q. But then you and Mr. Mendrygal have not talked about
6 these notes?

7 A. No.

8 Q. Anything else different about Exhibit B attached to
9 8 and this Exhibit 20? For the record, you're going page by
10 page comparing Exhibit B and Exhibit 20, are you not?

11 A. I am.

12 Q. Okay.

13 A. On Page 2 of 37 --

14 Q. On Page 22?

15 A. I'm sorry -- 22 of 37 --

16 Q. Yes.

17 A. -- there's a transaction dated 3/7/2006 --

18 Q. Yes.

19 A. -- for Office Depot in the amount of \$1,203.87.

20 Q. Yes.

21 A. There's a red star next to the date and there is a
22 red etching. It says, memo only. That does not exist on --

23 Q. On 22 of 37, Exhibit B?

24 A. Of Exhibit B dated 10/18, yes, with the 10/18 memo.

25 Q. Whose note is that? Do you know?

1 A. That's Mr. Mendrygal's.

2 MS. CARPENTER: It's the December 18 memo,
3 right? You said 10/18 memo.

4 THE WITNESS: I said 10/18?

5 MS. CARPENTER: Yes.

6 THE WITNESS: It's December 18th.

7 Q. (BY MR. ORTIZ) How about the next page?

8 A. All right. That bracket I'm going to say was not
9 copied.

10 Q. Okay.

11 MS. CARPENTER: For the record, what page?

12 THE WITNESS: It's Page 23 of 37. The bracket
13 in the left-hand corner -- or left-hand margin, it didn't copy
14 here but it is present.

15 MS. CARPENTER: Okay.

16 A. I'm struggling a little bit with this highlighting
17 here.

18 Q. (BY MR. ORTIZ) For the record, you're looking at
19 Bates stamp 88, Page 24 of Page 37 of Exhibit B; is that
20 correct?

21 A. Yes. It appears as if it's all been highlighted.

22 Q. Well, suffice it to say that Exhibit B attached to
23 Exhibit 8 is a very poor duplication of this original Exhibit
24 B, sir; isn't that correct?

25 A. No, it's not a poor duplication. It just doesn't

1 show the highlighting. You can read everything else.

2 Q. It doesn't show the highlighting, right?

3 A. Yes.

4 Q. And the highlighting in your opinion on this
5 instrument is very important, is it not?

6 A. It designates what receipts are present.

7 Q. In your way of thinking, right?

8 A. Yes, sir. Okay.

9 Q. Now, you've looked through this entire Exhibit B
10 page by page, Exhibit B attached to Exhibit 8, and this
11 original document which we've marked Exhibit 20A, have you not?

12 A. Yes, I have.

13 Q. And we've now talked about all of the differences,
14 sir; is that correct?

15 A. Yes, sir.

16 Q. After Mr. McCann's February 15th production, how
17 many receipts had he turned in?

18 A. I need to look at the report. I don't know the
19 exact numbers. I just know that the total was about 85
20 percent. I don't know the exact numbers.

21 Q. Now, of this investigation team -- and this
22 investigation team's charged Dallas Independent School District
23 how much money?

24 A. I don't know, sir.

25 Q. Over a million dollars?

1 A. I don't know, sir.

2 Q. You told me earlier that before this Fish law firm
3 hired you, you read in the paper about this Fish law firm
4 getting hired and you sent them a resume; is that correct?

5 A. Yes, I did.

6 Q. Have you kept up with the media attention about how
7 much this law firm's charged Dallas Independent School
8 District?

9 A. No, I haven't.

10 Q. You haven't kept up with that?

11 A. No, I haven't kept up with how much they've charged.
12 I have no idea what they've charged.

13 Q. Of this investigation team that's charged them
14 however much money, you were primarily responsible for the
15 receipts; is that correct?

16 A. Receipt examination, yes, sir.

17 Q. Tell me and tell Judge Ahrens how many receipts that
18 Mr. McCann ultimately produced as of the February 15th, '07
19 production.

20 A. May I look at these reports?

21 Q. Yeah. So then until now, you've not calculated the
22 number; is that correct?

23 A. Yes, I have calculated the number. I just don't
24 remember what it is.

25 Q. Have you made a note of the number of receipts he's

1 turned in anywhere?

2 A. Yes, I have.

3 Q. Where?

4 A. It's in my notes. I made copies of it and submitted
5 it.

6 Q. But it's over 85 percent?

7 A. I calculated it about 85 percent. I wouldn't say
8 over because I don't -- that doesn't come to my recollection.

9 Q. How many transactions are we talking about?

10 A. We're talking about a total of 835 transactions.

11 Q. How many receipts through the February 15th
12 production did Mr. McCann ultimately produce?

13 A. 85 percent of 835.

14 Q. How many in number, though, a number? Is it 800
15 receipts, more or less?

16 A. 85 percent of that. 750 or so receipts. I think
17 that's about 85 percent.

18 Q. Now, Mr. Mendrygal said earlier -- let me represent
19 to you he said earlier that 85 percent of the total number is a
20 very good number meaning that most people didn't turn in that
21 many receipts. Do you agree with that?

22 A. No, I can't agree that most people did not. I don't
23 know what most people turned in because we haven't done 1,500
24 cardholders. But I -- based on anybody turning in 85 percent
25 of their receipts, I would consider that a good -- a good

1 presentation of receipts.

2 Q. And someone that presented at least 85 percent of
3 the receipts of their transactions, that would not indicate
4 deception to you, would it?

5 A. Well, it would depend on the ones that were missing,
6 the receipts that were missing.

7 Q. And tell me about these 15 percent which you claim
8 are still missing by Mr. McCann.

9 A. I'm not concerned --

10 Q. Do they indicate deception?

11 A. They do not indicate any deception, no.

12 Q. Why is that?

13 A. Because they -- they are -- without looking at
14 exactly which ones are missing -- Mr. McCann's receipts in
15 general -- not just the 15 percent but his receipts in general
16 appeared to be purchases in support of his role as a principal
17 and in support of the education of the kids.

18 Q. So not a single transaction you've reviewed about
19 Mr. McCann caused you a concern, my gosh, is he going to Vegas
20 on this or anything like that?

21 A. Well, there are a couple of transactions that I have
22 some concern about since the February 15th examination. And
23 that is that Mr. McCann indicated that no one had used his
24 p-card, his purchase card. And receipts submitted in the 2/15
25 submission have signatures that do not appear to be Mr.

1 McCann's. And so I don't know anything about Las Vegas, but
2 that concerns me.

3 Q. Well, did it cause you such a concern to request to
4 ask to interview Mr. McCann again?

5 A. I didn't request to interview Mr. McCann, no.

6 Q. Why not?

7 A. Because I don't request to interview people.

8 Q. That's up to Kip?

9 A. Yes. I pass my findings on; and if the decision is
10 made to reinterview someone, then we go forward.

11 Q. Did either you or Kip supplement this December 18,
12 '06 report and present that to the ad hoc committee?

13 A. I did not. I did not. I don't know if it was
14 presented to them or not.

15 Q. Do you know when this ad hoc committee recommended
16 to fire Mr. McCann?

17 A. No, sir.

18 Q. Let me represent to you that it was on or about
19 January 30, 2007.

20 A. All right.

21 Q. Do you believe in all fairness to Mr. McCann that it
22 would have been helpful had someone let this committee know
23 about Mr. McCann's January 31 production only a day later and
24 the February 15th, two weeks later, production of documents?

25 A. I don't know that they weren't notified. I didn't

1 do it nor was I present when a notification was made.

2 Q. I understand clearly that you do not know one way or
3 the other whether or not this ad hoc subcommittee learned of
4 the January 31 production or the 2/15 production. That's
5 clear. What I'm asking you is, do you believe it would have
6 been more fair to Mr. McCann had this committee learned of
7 these two productions assuming no one shared this information
8 with this committee?

9 A. I don't know because I don't know what they based
10 their decision on.

11 Q. But clearly had Mr. McCann produced that January 31
12 production and the 2/15 production by January 30th of '07, it
13 would have surprised you to learn that the district would still
14 be trying to fire him; isn't that correct?

15 A. No, I'm not surprised. I'm not surprised that they
16 would proceed with that.

17 Q. That even had he turned in 85 percent?

18 A. That's right.

19 Q. Why not?

20 A. Because -- I'm not surprised because I think Mr.
21 McCann deceived us in the investigation. And again, I don't
22 know why they made their decision; but this doesn't help me any
23 with the fact that he deceived us. I don't care if he turned
24 in 100 percent of his receipts. He deceived me in the
25 beginning as I see it, and that's why to me that I don't know

1 that it would have mattered to me. But I don't know what the
2 committee decided.

3 Q. Did either you or Kip or anyone at this Fish law
4 firm ever share with this subcommittee -- this ad hoc legal
5 review committee that you believe Mr. McCann deceived and is a
6 liar?

7 A. Did we ever share that with them?

8 Q. Yes.

9 A. No. No, we didn't.

10 Q. Do you know whether or not this legal review
11 committee ever learned y'all's real thoughts about McCann is
12 he's a liar?

13 A. I don't know.

14 Q. Exhibit 19, let me represent to you is yet a new
15 production of yet additional receipts, Mr. Nielsen. I doubt
16 you've seen these documents before today; is that correct?

17 A. I don't know. If you're representing to me that
18 these were not previously submitted, then I've not seen them.

19 Q. I'm representing to you that that set of documents,
20 Exhibit 19, was produced to the district's counsel only two
21 days ago.

22 A. Well, then I have not yet seen them.

23 Q. Okay. Is it of interest to you to take the time, of
24 course if you get paid, to review these documents and see how
25 many additional new receipts that they tabulate in behalf of

1 Mr. McCann?

2 MR. WOOD: Objection; form.

3 A. I would go forth to Mr. Mendrygal and make him aware
4 of this and I would suggest to him does the district want me to
5 go forward with this. If they said yes, then I would; if they
6 said no, then I would not.

7 Q. (BY MR. ORTIZ) If the district says yes, if we
8 leave a blank in your deposition, will you let me know your
9 opinion of the number of new receipts included in Exhibit 19?

10 A. I'm sorry? I misunderstood the question.

11 Q. Assuming that the people at the Fish law firm
12 approve, assuming that the school district approves to let you
13 review Exhibit 19 to determine if there are new additional
14 receipts you've not seen before, would you do that for us? And
15 if we leave a blank in your deposition, would you place when
16 you read the deposition the number of new receipts included in
17 Exhibit 19?

18 A. Yes, sir.

19 MR. WOOD: Objection; form.

20 REQUESTED INFORMATION:

21

22

23 MR. ORTIZ: No further questions.

24 MR. WOOD: I'll reserve my questions for the
25 time of the hearing.

1 (Deposition concluded, 7:27 p.m.)

2 (Exhibit No. 20A marked.)

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

1 CHANGES AND SIGNATURE

2 WITNESS NAME: DATE OF DEPOSITION:

3 PAGE LINE CORRECTION REASON

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

1 I, PETER NIELSEN, have read the foregoing deposition and
 2 hereby affix my signature that same is true and correct, except
 3 as noted above.

4

5 PETER NIELSEN

6

7

8

9 THE STATE OF TEXAS)

10 COUNTY OF)

11 Before me, , on this day personally
 12 appeared PETER NIELSEN known to me (or proved to me under oath
 13 of through) (description of identity card or
 14 other document) to be the person whose name is subscribed to
 15 the foregoing instrument and acknowledged to me that they
 16 executed the same for the purposes and consideration therein
 17 expressed.

18 Given under my hand and seal of office this day of
 19 , 2007.

20

21

22

23

24

Notary Public in and for
 the State of Texas

25

NO. 052-LH-0207

1
2 DALLAS INDEPENDENT SCHOOL) BEFORE THE INDEPENDENT
3 DISTRICT,)
Petitioner) HEARING EXAMINER
4)
VS.) FOR THE STATE OF TEXAS,
5)
ARDIS McCANN)
6 Respondent) FREDERICK AHRENS

7
8 REPORTER'S CERTIFICATION
9 DEPOSITION OF PETER NIELSEN
10 MARCH 22, 2007

11 I, MELISSA SPIVEY, Certified Shorthand Reporter in and for
12 the State of Texas, hereby certify to the following:

13 That the witness, PETER NIELSEN, was duly sworn by the
14 officer and that the transcript of the oral deposition is a
15 true record of the testimony given by the witness;

16 That the deposition transcript was submitted on 3/27/07 to
17 the attorney representing the witness for examination and
18 signature and to be returned to me by 4/17/07;

19 That the amount of time used by each party at the
20 deposition is as follows:

21 MR. DANIEL A. ORTIZ - 1:06

22 That pursuant to information given to the deposition
23 officer at the time said testimony was taken, the following
24 includes all parties of record:

25 Mr. D. Craig Wood, Attorney for Petitioner
Ms. Sandra Carpenter, Attorney for Petitioner

1 Mr. Daniel A. Ortiz, Attorney for Repondent
Mr. Shane Goetz, Attorney for Repondent

2
3 I further certify that I am neither counsel for, related
4 to, nor employed by any of the parties in the action in which
5 this proceeding was taken, and further that I am not
6 financially or otherwise interested in the outcome of the
7 action.

8 Further certification requirements pursuant to Rule 203 of
9 TRCP will be certified to after they have occurred.

10 Certified to by me this 26th day of March, 2007.

11
12
13
14
15 MELISSA SPIVEY, Texas CSR 3715
Expiration Date: 12/31/2007
3109 Sunset Oaks
16 Arlington, Texas 76016
817.226.4399
17
18
19
20

21 FURTHER CERTIFICATION UNDER RULE 203 TRCP

22 The original deposition was/was not returned to the
23 deposition officer ;

24 If returned, the attached Changes and Signature page
25 contains any changes and the reasons therefor;

1 If returned, the original deposition was delivered to MR.
2 DANIEL A. ORTIZ, Custodial Attorney;

3 That \$ is the deposition officer's charges to
4 the Respondent's attorney for preparing the original deposition
5 transcript and any copies of exhibits;

6 That the deposition was delivered in accordance with Rule
7 203.3, and that a copy of this certificate was served on all
8 parties shown herein on and filed with the clerk.

9 Certified to by me this day of , 2007.

10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

MELISSA SPIVEY, Texas CSR 3715
Expiration Date: 12/31/2007
3109 Sunset Oaks
Arlington, Texas 76016
817.226.4399