

1 Campbells, do you recall any other personal encounters
2 in the fall of 2011?

3 A No. I don't recollect talking to them any
4 other time in that time period.

5 Q In encounter number two where they came in
6 with some witnesses or supporters, when you asked them
7 to leave, did they leave?

8 A No. They refused to leave.

9 Q And what did you do in response to their not
10 leaving?

11 A I informed them that if they did not leave,
12 I was going to call the Sheriff's Department. They
13 refused to leave. So I instructed Crystal to phone the
14 Sheriff's Department.

15 Q And was the Sheriff's Department actually
16 telephoned?

17 A Yes.

18 Q Did a sheriff's deputy actually show up?

19 A Yes.

20 Q Was that before or after the Campbells left?

21 A The Campbells went out of the office and
22 waited for the deputy in the parking lot.

23 Q And do you know whether they had a
24 conversation with the deputy?

25 A Yes.

D. Clutter

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1 Q And is that a true and accurate signature of
2 yours that was attested to on February 9, 2012?

3 A It is.

4 Q There's been a series of questions that have
5 come out today partly because of the indentures, which
6 were alleged to have been filed in May of 2011. It says
7 that: Whereas National Development Company, Inc., a
8 Texas corporation, is the owner of certain real property
9 located in Washington County.

10 Can you tell us what your understanding
11 of the relationship between National Development
12 Company and Woodland Lakes Trusteeship is?

13 A Yes. National Development Company was the
14 developer of Woodland Lakes. They started the
15 development in 1980, and in April of 19 -- and they were
16 the original trustee, thus, that's why they're mentioned
17 in there. On April of 1985 the current trustee, who was
18 an officer of National Development, turned the
19 Association over to the property owners.

20 Q And when you say the property owners, are
21 you talking about Woodland Lakes Trusteeship?

22 A We did not become the Trusteeship until
23 later on when we filed -- incorporated, but the
24 Association was turned over to the property owners in
25 April of 1985.

D. Clutter

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1 Q And according to this affidavit you
2 completed Paragraph 10 says: National Development has
3 had no involvement with Woodland Lakes since 1996. What
4 was -- that ensuing ten years what was their
5 involvement?

6 A Between 1985 and 1996 we cohabited.
7 National Development was still the developer who still
8 sold lots. They were still developing the development.
9 We were the Homeowner's Association and collected the
10 assessment fees, and maintained those areas that were
11 completed that National -- after a certain period of
12 time National would turn those common ground areas over
13 to us and we would maintain them. In 1996 they left.

14 Q And so if I understand what you're saying,
15 in 1996 National Development had no involvement
16 whatsoever in the lake development in or with Woodland
17 Lakes Trusteeship; is that right?

18 A In 1996 they sold us their office and they
19 pulled out. They still owned a number of lots at that
20 time.

21 Q Are you aware of a lawsuit between Woodland
22 Lakes Trusteeship and the National Development Company?

23 A Yes.

24 Q What was the result of that lawsuit?

25 A The result of that lawsuit was in 1985 when

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1 assessments, to actually file a lien with the
2 courthouse?

3 A We do on occasion file paper liens.

4 Q And can you tell us what criteria do you use
5 to file a paper lien against a homeowner?

6 A It's just if it is -- I don't know what the
7 criteria would be, per say, but we have filed paper
8 liens on individuals.

9 Q And have you filed a paper lien on the
10 Campbells?

11 A Yes.

12 Q Can you tell us when that was filed?

13 A No. I don't know where it's went.

14 Q Would it have been filed sometime after the
15 fall of 2011?

16 A Yes.

17 Q Who is Robert Murphy?

18 A He is currently one of the trustees.

19 Q Was he a trustee back in the fall of 2011?

20 A No.

21 Q Did he have any official capacity with the
22 trustees in the fall of 2011?

23 A No. He was just a property owner.

24 MR. MATHENY: I think we need to take a
25 short break with my client.

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1 Q The Trusteeship does not buy or sell lots
2 within the -- .

3 A -- No, sir, they do not.

4 Q And the Trusteeship was assigned the rights
5 of National Development to enforce the restrictions; is
6 that correct?

7 A Yes, sir.

8 MR. STRUZZI: No further questions.

9 THE WITNESS: Okay.

10 REDIRECT EXAMINATION

11 BY MR. MATHENY:

12 Q When were they dissolved again?

13 A It was either -- I think it 1985 is when
14 they actually took Trusteeship. In 1984, I think, they
15 tried, and the Federal Judge threw some of the rules
16 out. So they had to take it amongst the people to get
17 the rules set by the people, and, I believe, it was 1985
18 or '86. I would have to go back through the files to
19 look.

20 Q So they may have still been in existence in
21 1986?

22 A What?

23 Q National Development Company.

24 A No, sir. I don't think so. I think it was
25 '85 -- the end of '85, beginning of '86 Trusteeship took

Attach.
J

1 Q And did you ask them to leave immediately or
2 following a discussion with them?

3 A I asked them to leave pretty much as soon as
4 they walked in the door.

5 Q And the people that they arrived with, were
6 they -- did you perceive them as being like the Campbell
7 supporters or something like that?

8 A Yes. They also all had their phones out as
9 well.

10 Q And can you identify some of the people that
11 they were with?

12 A There was Luann Campbell. For the life of
13 me I can't remember. There were several. I can't
14 remember the names of the others.

15 Q And at either meeting one or meeting two did
16 the Campbells tender any money to you as far as the
17 payment of the assessments?

18 A They owed the money through the collection
19 agency. We do not take money for accounts that are in
20 collections. That has to be paid through them.

21 Q So they -- did you at either one of these
22 meetings accept payment of assessments from them?

23 A No. They were instructed to pay through J C
24 Morgan.

25 Q And are you familiar with a letter that was