

MONTANA TWENTY-FIRST JUDICIAL DISTRICT COURT  
RAVALLI COUNTY

JOHN WATSON, )  
 )  
 Plaintiff, )  
 )  
 -vs- ) Cause No. DV-03-145  
 )  
 DEVRA WEST, )  
 )  
 Defendant. )  
 )

Taken at 100 West Railroad Street, Suite 200  
Missoula, Montana  
Friday, October 9, 2009 - 10:30 a.m.

D E P O S I T I O N

OF

MS. DEVRA PATTON WEST

Reported by Stephen D. Gerger, CSR,  
Jeffries Court Reporting,  
1015 Mount Avenue, Suite C,  
Missoula, Montana 59801 Phone (406) 721-1143  
Freelance Court Reporter for the State of Montana,  
residing in Corvallis, Montana.

1 APPEARANCES

2 RYAN C. WILLMORE, Esq., of the law firm of Browning,  
3 Kaleczyc, Berry and Hoven, P.C., Northern Pacific  
4 Building, 100 West Railroad Street, Suite 200,  
5 Missoula, Montana 59802 ryan@bkbh.com.  
6 Appearing on behalf of John Watson,  
7 Plaintiff.

8 JAMES C. BARTLETT, Esq., Attorney at Law, P.O. Box  
9 2819, Kalispell, Montana 59903-2819 bartlett@centurytel.net  
10 Appearing on behalf of Devra West,  
11 Defendant.

12 ALSO PRESENT: Ms. Alaina Bucy

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1 FRIDAY, OCTOBER 9, 2009

2 Thereupon,

3 MS. DEVRA PATTON WEST,  
4 a witness of lawful age, having been first duly sworn  
5 to tell the truth and nothing but the truth,  
6 testified upon her oath as follows:

7 EXAMINATION

8 BY MR. WILLMORE:

9 Q. Good morning, Ms. West. My name is Ryan  
10 Willmore and you know I represent John Watson.

11 A. Correct.

12 Q. And the purpose today is to conduct a  
13 debtor's exam --

14 A. Uh-huh.

15 Q. -- for you to appear and answer about your  
16 property, if you have any, for the judgment that was  
17 -- I believe it's \$736,209.27.

18 You've been deposed before, correct?

19 A. Yes.

20 Q. How many times?

21 A. Once with Mr. Watson. I believe one time.

22 Q. I'm just going to go over a couple of ground  
23 rule. We need verbal responses. No uh-uhs or  
24 uh-huhs because it's hard for the court reporter to  
25 get it down.

1 A. Yes.

2 Q. It's important we don't talk over each  
3 other.

4 A. Uh-huh.

5 Q. Similar to the verbal responses, head nods  
6 don't show up on the record very well.

7 A. Okay.

8 Q. If there is a question you don't understand,  
9 you just ask me to rephrase it. I'm sure I'll ask a  
10 poor question at some point today that I probably  
11 won't even understand after I say it.

12 A. Okay.

13 Q. And if you need to take a break at any time,  
14 just let me know.

15 A. All right.

16 Q. I just ask that if I ask a question you  
17 answer it and then we take a break. And you  
18 understand you're under oath today?

19 A. Yes, I sure do.

20 Q. What did you do to prepare for today?

21 A. Pardon?

22 Q. What did you do to prepare for today?

23 A. Nothing.

24 Q. You didn't meet with your attorney?

25 A. No. I'm seeing him just now.

1 Q. You didn't meet with anyone else?

2 A. No.

3 Q. Didn't discuss it with anyone else?

4 A. No.

5 Q. What is your full name?

6 A. Devra Patton West.

7 Q. Are you known by any other names?

8 A. I have an authorship pen name by the name of  
9 Sura Ma. S-u-r-a M-a.

10 Q. Have you ever been known by any other names?

11 A. Meador, a married name, M-e-a-d-o-r, way,  
12 way, way, way back when.

13 Q. About how long ago?

14 A. Divorced in early '70s. Way back.

15 Q. And I'm sure -- it's Sura Ma?

16 A. Correct.

17 Q. I will probably butcher it and you'll have  
18 to correct me. What's your mailing address?

19 A. 786 Lakeside, P.O. Box.

20 Q. Okay.

21 A. They don't have any mail delivery out there.

22 Q. And your telephone number?

23 A. 250-2368.

24 Q. And your Social Security number?

25 A. --- -- 0246.

- 1 Q. And your date of birth?  
 2 A. 10-6-50.  
 3 Q. What's your current residential address?  
 4 A. 76 Shelter Cove, Lakeside.  
 5 Q. How long have you lived at Shelter Cove?  
 6 A. Since June.  
 7 Q. Where did you live before Shelter Cove?  
 8 A. 38 Bayview Drive. Also Lakeside.  
 9 Q. How long were you at Bayview?  
 10 A. Well, I wasn't there consistently, but off  
 11 and on I'm guessing about a year and a half, two  
 12 years, something like that.  
 13 Q. So about June of '07, roughly?  
 14 A. Roughly. Yes, roughly. Before that  
 15 Waterside Condos, also in Lakeside.  
 16 Q. How long at Waterside Condos?  
 17 A. Nine/ten months, something like that.  
 18 Q. And before Waterside?  
 19 A. Big Fork.  
 20 Q. What was the address in Big Fork?  
 21 A. I don't remember. I know where it was, I  
 22 can get you there, but I don't remember the street  
 23 address. Sorry.  
 24 Q. And before Big Fork were you in Victor?  
 25 A. Correct.

- 1 Q. Have you ever lived in Mexico?  
 2 A. No.  
 3 Q. Have you ever stayed down in Mexico for  
 4 extended periods?  
 5 A. For a five month period.  
 6 Q. And where were you staying at?  
 7 A. Various hotels.  
 8 Q. You don't own any property down there?  
 9 A. No, sir, I sure don't.  
 10 Q. Any property in the Phoenix area?  
 11 A. No.  
 12 Q. Ever spend any time down in the Phoenix  
 13 area?  
 14 A. Occasionally.  
 15 Q. Again in hotels?  
 16 A. Uh-huh, friends' homes, things of that  
 17 nature.  
 18 Q. Do you have any ownership interest in any  
 19 real property?  
 20 A. None whatsoever.  
 21 Q. Who owns the house at 76 Shelter Cove?  
 22 A. Mr. Reynolds does.  
 23 Q. And are you renting it from Mr. Reynolds?  
 24 A. No. I'm living in a very nice -- what do  
 25 you call it -- travel trailer on the property in the

- 1 back of the property.  
 2 Q. So you don't actually reside in the house?  
 3 A. No.  
 4 Q. And Mr. Reynolds doesn't charge you any rent  
 5 to stay on the land or anything like that?  
 6 A. No.  
 7 Q. Did you ever own any property in Colorado?  
 8 A. Yes. At one point in time my older son and  
 9 I owned a condo, I think it was in either Arvada or  
 10 Centennial, because they changed the boundaries. But  
 11 either one of those towns; I'm not sure which one it  
 12 was in.  
 13 Q. What happened to the condo?  
 14 A. It was sold a year and a half ago, something  
 15 like that.  
 16 Q. Who was it sold to?  
 17 A. I have no idea. My son handled the  
 18 transaction.  
 19 Q. Did you receive any --  
 20 A. No. We sold it below what we had purchased  
 21 it for at a considerable loss. And, you know,  
 22 realistically I probably owe my son \$8-/\$10,000  
 23 coming out of the deal.  
 24 Q. So you took a loss on that?  
 25 A. Correct.

- 1 Q. Did you ever own a residence at 525  
 2 Political Hill Road?  
 3 A. No. It was titled to me very briefly, but  
 4 it became the subject of somebody else's foreclosure.  
 5 Q. So that was foreclosed upon?  
 6 A. Correct.  
 7 Q. When did that foreclose?  
 8 A. Well, the individual who had titled the home  
 9 to me in exchange for money she had owed me went  
 10 through the whole process without informing us at  
 11 all, so we never had an opportunity to do anything  
 12 about it. And I'm guessing that happened two years  
 13 ago.  
 14 Q. And who is that individual?  
 15 A. Patricia Cole.  
 16 Q. So does she own that home now, do you know?  
 17 A. She foreclosed on it.  
 18 Q. And so sold at auction?  
 19 A. I really wouldn't know what happened to it.  
 20 Q. And then who owns the home at 38 Bayview?  
 21 A. I don't -- the fellow's name that I heard  
 22 them talk about was Perry. I don't really know who  
 23 owned the home there.  
 24 Q. And when you say they, you heard they talk  
 25 about it --

- 1 A. Mr. Reynolds.  
 2 Q. So I guess how did you come about staying at  
 3 38 Bayview?  
 4 A. Mr. Reynolds was happy to allow me to stay  
 5 there, so I did.  
 6 Q. So were you living in that home?  
 7 A. Yes, I was, uh-huh.  
 8 Q. Was Mr. Reynolds living there?  
 9 A. No.  
 10 Q. Who was living there with you?  
 11 A. Myself. Occasionally one of my kids would  
 12 stay there as well.  
 13 Q. And, I guess, do you know what the  
 14 relationship between Mr. Reynolds and Perry or  
 15 whoever the owner was?  
 16 A. Not really. None that I know of. There's  
 17 no family relationship between the two of them that I  
 18 know of. Nothing was ever mentioned to me along  
 19 those lines.  
 20 Q. Were you paying rent?  
 21 A. No.  
 22 Q. Were you paying any of the utilities or  
 23 other expenses?  
 24 A. No.  
 25 Q. Who was paying that?

- 1 A. Mr. Reynolds.  
 2 Q. And is there a particular reason why Mr.  
 3 Reynolds was covering all the costs?  
 4 A. He wanted to.  
 5 Q. What is your relationship with Mr. Reynolds?  
 6 A. Friends.  
 7 Q. So why did you leave 38 Bayview?  
 8 A. Because I felt unsafe there.  
 9 Q. Can you explain to me why you felt unsafe?  
 10 A. Due to the numerous threats that I had  
 11 received from Mr. Watson I wasn't able to sleep at  
 12 night, so I wasn't able to be calm or feel in any way  
 13 safe.  
 14 Q. You previously had some websites, is that  
 15 correct?  
 16 A. Yes, uh-huh.  
 17 Q. When were those taken down?  
 18 A. Well, the primary website that I have any  
 19 knowledge of was taken down, I'm guessing, in June or  
 20 July.  
 21 Q. And what website was that?  
 22 A. Surasanctom.com I think is what it was  
 23 called.  
 24 Q. Was there also a suraunlimited.com?  
 25 A. No, I don't think so. I think it was called

- 1 something else and they changed it because Mr. Watson  
 2 was very persistent in committing what is called  
 3 Internet squatting.  
 4 Q. And so they were taken down in June or July?  
 5 A. Correct.  
 6 Q. Why were they taken down?  
 7 A. Because the bill wasn't paid.  
 8 Q. And who was supposed to be paying that bill?  
 9 A. Generally Mr. Reynolds took care of those  
 10 matters.  
 11 Q. And where did the funds come from to pay  
 12 those?  
 13 A. Generally the operations, such as they were,  
 14 were contributed to by my oldest son, by a Dr.  
 15 Williams, and also by Mr. Reynolds himself.  
 16 Q. And what's your oldest son's name?  
 17 A. Rob Meador.  
 18 Q. So do you have any websites currently up?  
 19 A. No.  
 20 Q. Are you currently employed?  
 21 A. Nope.  
 22 Q. Are you receiving any income?  
 23 A. Oh yes. I receive support, again from my  
 24 son, from Dr. Williams, and also from Mr. Reynolds  
 25 and his wife on a cash basis as needed.

- 1 Q. What do you receive from your son?  
 2 A. Nothing of late, but he has helped out from  
 3 time to time.  
 4 Q. And what amounts are we talking about when  
 5 you say helped out?  
 6 A. Well, I have a son who was injured in a car  
 7 accident and I'm oftentimes trying to help him. Also  
 8 my daughter who is a single mother. And so there are  
 9 times when my son sends money that I am then  
 10 dispensing to the children. He's considerably older  
 11 than the younger children.  
 12 Q. And who is the son that was in a car  
 13 accident?  
 14 A. Chris Heywood.  
 15 Q. And so again, when is the last time that  
 16 Rob, your son Rob provided you with money?  
 17 A. I'm not really sure, to be honest with you,  
 18 because I don't keep track of it particularly. Mr.  
 19 Reynolds and the other gentlemen discuss amongst  
 20 themselves what is needed. I don't necessarily  
 21 always know who has contributed what. I'm just  
 22 trying to think that -- you know, money directly to  
 23 my daughter doesn't really count. I know he sent her  
 24 money to travel to Denver in August, as an example.  
 25 I don't believe I received money directly from my son

1 since the middle of last winter.

2 Q. Do you recall what amount that was?

3 A. No, but it would certainly be less than a  
4 thousand dollars, something like that.

5 Q. That's fine. That's what I'm trying to get  
6 at. And I think you said that Mr. Reynolds and the  
7 gentlemen discussed it. Who?

8 A. My son and Dr. Williams, and Jeff and his  
9 wife, Mr. Reynolds and his wife.

10 Q. Who is Dr. Williams?

11 A. Who is he?

12 Q. Yes.

13 A. He is a cardiologist who is the head of  
14 cardiology in a hospital in Texas. I know where his  
15 home is; I'm not sure what town his hospital is in.

16 Q. But somewhere in Texas?

17 A. Yes.

18 Q. And what is his role in providing you funds?

19 A. Well, he was a student of meditation for  
20 many years, attended the conferences and retreats and  
21 so on I've done over the years. He's very upset with  
22 the perpetrations that Mr. Watson has committed and  
23 feels exceedingly appalled by it, and very committed  
24 to making sure that at least my basic needs are met.

25 Q. And when is the last time he provided you

1 any funds?

2 A. I'm sure recently.

3 Q. And is he providing the funds to you or is  
4 he providing it to Mr. Reynolds?

5 A. He provides everything to Mr. Reynolds. Mr.  
6 Reynolds then takes care of any disbursements that  
7 are necessary to cover my basics.

8 Q. And then Mr. Reynolds and his wife also  
9 contribute?

10 A. Correct.

11 Q. And what amounts are they contributing?

12 A. I don't know, but all together it varies  
13 because it's not really consistent. There are times  
14 when I stay with friends or family members. There  
15 are times when I'm invited to do a small informal  
16 type of meditation, you know, weekend type of thing,  
17 so I stay with people for a week or two. But it's  
18 usually not more than \$2- to \$4,000 per month, in  
19 that neighborhood. But it's not, you know, a set  
20 amount each month.

21 Q. And then where is that \$2- to 4,000 a month  
22 being distributed to or going to?

23 A. Gas, food, things of that nature. Basics.

24 Q. Do you receive any retirement?

25 A. No.

1 Q. Do you have any sort of trust fund or --

2 A. No.

3 Q. When did you retire?

4 A. When did I retire?

5 Q. Uh-huh.

6 A. Well, I don't necessarily feel as though any  
7 idea of retirement is permanent. I've definitely for  
8 health reasons had to be in semi-retirement. My  
9 primary focus of work is authoring books, so I don't  
10 really need to go anywhere or do anything to do  
11 that. So essentially I'm a writer and meditation  
12 teacher.

13 I no longer am on the lecture circuit. As  
14 you well know, Mr. Watson was very diligent about  
15 destroying my reputation, so with that he also  
16 destroyed my livelihood.

17 Q. So I guess retirement was probably a bad  
18 choice of words. When is the last time you had  
19 employment where you were getting like a monthly  
20 paycheck?

21 A. Years now.

22 Q. Would that have been with Circle of Divine  
23 Unity?

24 A. I was supposed to have gotten a paycheck  
25 from them. Most of the time I did not. That's part

1 of the reason why I resigned.

2 Q. But is that the last what I guess I would  
3 call a paying job?

4 A. Correct.

5 Q. That ended '04/05-ish?

6 A. No, before that. I submitted one  
7 resignation to them in January of 2002, to which I  
8 received no response whatsoever. I submitted the  
9 same resignation to them in 2003 from which I  
10 received no response whatsoever either.

11 Q. So it was about roughly 2003, then, that --

12 A. No. Actually I packed up and left prior, in  
13 July/August of 2002. No, I'm sorry, I'm getting my  
14 years -- 2002, so it would have been the previous  
15 one. I'm sorry, I'm confused. I know they were  
16 spaced out. No one responded. No one was in  
17 charge. I never was there at that location much in  
18 any case.

19 And I had left all my belongings there as  
20 well for about a year and a half without ever going  
21 there. But I had informed them, in fact publicly  
22 informed them during a conference, actually, that Mr.  
23 Watson was in attendance to in June -- that would  
24 have been June of either 2002 or 2003 -- that I was  
25 planning on relocating to Big Fork at that time. And

1 then by the fall preceding I had already come up to  
2 Big Fork at that point.

3 Q. So I think, correct me if I'm wrong, you  
4 said that you weren't getting your monthly salary  
5 from them and that was part of the issue?

6 A. It was definitely part of the issue.

7 Q. And what was your monthly salary from them?

8 A. It was decided by a Board of Director vote.

9 I believe it was either \$110- or \$120,000 a year.

10 Q. And did you ever receive any of that income?

11 A. On occasion. Essentially it was my lecture  
12 circuit and teaching events that generated the vast  
13 majority of the foundation's monies, and I estimated  
14 that I essentially bequeathed to the non-profit  
15 approximately 90 percent of my income on a regular  
16 basis, keeping approximately ten percent of my monies  
17 for myself. However, they weren't very good  
18 managers, made enormous well intended proposals and  
19 infinite promises and claims which they did not  
20 follow through on.

21 Q. Did you ever file any sort of claim against  
22 them?

23 A. I threatened a lawsuit to them. I wrote  
24 them accordingly that if they did not start doing  
25 something about the mess that they had created -- the

1 primary reason I considered a lawsuit is that two  
2 years after I had resigned they somehow managed to  
3 procure something like four to five credit cards in  
4 my name and had forged my signature to do it and had  
5 racked up bills and then not paid them. So I was not  
6 real happy about that having had happen. I was told  
7 that they planned to repay them before I found out  
8 and, therefore, somehow they rationalized it.

9 Q. So there's credit cards out there in your  
10 name with a bunch of debt on it?

11 A. Well, from what I understand. In the  
12 documents that I have received from Patricia Cole,  
13 who filed bankruptcy, she included all of the  
14 non-profit debt that she thought would in any way  
15 touch the hem of her veil in there. So I saw some of  
16 that on her bankruptcy declaration papers.

17 Q. So is that debt discharged, then?

18 A. I don't know. I think the whole thing was  
19 finalized. At one point they didn't agree and then  
20 finally they did agree. I'm not -- I couldn't really  
21 tell you what the exact status of any of that was.

22 Q. But these were credit cards in your personal  
23 name?

24 A. Well, it was smooshed in with everything  
25 else. She did this sort of general -- like all of

1 the monies which she owed me. She also just made  
2 general statements without giving specific amounts.

3 Q. Have you run a credit report in your own  
4 name to see if there's credit cards out there?

5 A. No.

6 Q. Do you know if there's any other credit card  
7 debt out there in your name?

8 A. Well, yes. I am deeply in debt.

9 Q. What --

10 A. I couldn't tell you the exact amounts and I  
11 sure couldn't tell you the credit cards or anything  
12 like that because, again, Mr. Reynolds handles all  
13 that for me.

14 Q. Would you be willing to provide  
15 documentation to us today on that?

16 A. I'm sure he could if you needed it or wished  
17 it.

18 Q. Are you willing to provide that to your  
19 attorney to provide to me?

20 A. Sure. No problem. It's just not something  
21 that I personally ever -- I didn't oversee any of  
22 that whatsoever.

23 MR. WILLMORE: And are you all right with  
24 providing that to me, Mr. Bartlett?

25 MR. BARTLETT: If they're in her name as

1 opposed to some other business, yes, that's fine.

2 Q. (By Mr. Willmore) Do you know if anyone  
3 else is authorized to use those credit cards that are  
4 in your name?

5 A. Not to my knowledge. And there aren't any  
6 credit cards in my name that haven't been defunct for  
7 several years.

8 Q. But there is some credit card debt in your  
9 name?

10 A. Oh, credit card debt? Correct.

11 Q. But --

12 A. I'm guessing. I'm assuming this. I mean, I  
13 know that I'm in debt.

14 Q. So is it your understanding, then, that you  
15 had this credit card debt, it wasn't paid, so now the  
16 credit cards basically said you're not going to  
17 charge any more, that's why you don't have any credit  
18 cards?

19 A. Yes, years ago.

20 Q. But the debt is still out there?

21 A. Correct. Or one would assume that it is. I  
22 haven't heard from anybody in quite some time.

23 Q. Do you know if they filed any claims against  
24 you for the credit card debt?

25 A. I wouldn't know. Not that I know of.

1 Q. Did you file taxes for 2008?  
 2 A. I don't know. I don't think so.  
 3 Q. Who would know?  
 4 A. Mr. Reynolds.  
 5 Q. Do you know why you wouldn't have filed  
 6 taxes for 2008?  
 7 A. I'm not sure. Didn't get around to it. I'm  
 8 not sure why he wouldn't have gone forward with  
 9 that. I mean we've been under -- I'm been under  
 10 extreme financial hardship and duress. I would  
 11 imagine that is why he may not have filed yet.  
 12 Q. If he were to file, would he file in  
 13 Montana?  
 14 A. Where else would he file? I would guess so.  
 15 Q. Did you file for 2007?  
 16 A. I remember him saying that it had been filed  
 17 and I owe money for 2007.  
 18 Q. Do you know what your income was for 2007?  
 19 A. No, I don't.  
 20 Q. Besides the credit card debt, do you have  
 21 any other debts?  
 22 A. Yes. There is the close to a million  
 23 dollars to Naka Shela, the property in Victor, that  
 24 foreclosure.  
 25 COURT REPORTER: Would you spell that for

1 me, please?  
 2 A. The property address was 736 Fred Burr  
 3 Road. It's an Indian name, Naka Shela.  
 4 Q. I've seen it somewhere but I couldn't even  
 5 attempt to spell it.  
 6 A. I think it's Lakota, actually.  
 7 Q. So that debt is still out there, they have a  
 8 deficiency on the foreclosure?  
 9 A. Correct.  
 10 Q. Any other debt?  
 11 A. I owe Mr. Reynolds money. I owe my son Rob  
 12 money. I'm not really apprised of each and every  
 13 vendor or supplier to whom I owe money, but a variety  
 14 of vendors and suppliers and credit cards. Over a  
 15 million dollars in debt.  
 16 Q. And Mr. Reynolds would have all that  
 17 information?  
 18 A. He would.  
 19 Q. And do you know how much you're indebted to  
 20 Mr. Reynolds?  
 21 A. I'm guessing in the neighborhood of six to  
 22 seven hundred grand.  
 23 Q. And how about your son Rob?  
 24 A. Several hundred thousand.  
 25 Q. Did you ever --

1 A. I estimated that it was about two million in  
 2 all that I'm in debt. You know, not counting the  
 3 award with Mr. Watson, should the appeal go in his  
 4 favor.  
 5 Q. Do you have loans from anyone?  
 6 A. Pardon?  
 7 Q. Do you have any loans? Have you taken any  
 8 loans either from an institution or from an  
 9 individual?  
 10 A. Well, that's why I owe Mr. Reynolds and my  
 11 son money, yes. They originally expected to be  
 12 repaid.  
 13 Q. Other than Mr. Reynolds or your son?  
 14 A. There was a loan from Wells Fargo that was  
 15 defaulted on that is part of that amount of money  
 16 that is owed.  
 17 Q. And do you know how much you owe Wells  
 18 Fargo?  
 19 A. I think it was a couple hundred grand.  
 20 Q. Do you know what the status is? Have they  
 21 filed a claim against you?  
 22 A. Yes.  
 23 Q. Have they filed a lawsuit?  
 24 A. I don't know what the difference is, quite  
 25 frankly. But not to my knowledge. I don't know. I

1 really couldn't tell you exactly. My son co-signed  
 2 on it so he's in hot water with it as well.  
 3 Q. Your son Rob?  
 4 A. Uh-huh.  
 5 Q. And is that here in Montana or in Colorado?  
 6 A. What?  
 7 Q. Where the --  
 8 A. The Wells Fargo loan?  
 9 Q. Yes.  
 10 A. Here in Montana.  
 11 Q. Did you ever have any loans from your  
 12 father?  
 13 A. No.  
 14 Q. You never borrowed \$30,000 from your father?  
 15 A. Borrowed from my father? No.  
 16 Q. Other than the judgment in this case, are  
 17 there any other judgments pending against you?  
 18 A. No, not that I can think of.  
 19 Q. Are there any other legal proceedings  
 20 against you other than this case and potentially the  
 21 Wells Fargo?  
 22 A. I'm not sure what the status of one is  
 23 regarding the 525 Political Hill home where a deck  
 24 was commenced being built during the time period  
 25 where I did have title to the home. It didn't pass

1 inspection by building codes and so the kid that had  
2 done the job was -- we refused to pay him the second  
3 portion of his money. So there's been a wrangle  
4 about that going on. I think my son had a judgment  
5 against him on that. And I considered suing them but  
6 I haven't had really the financial leeway to do that,  
7 so it hasn't been done yet that I know of.

8 Q. And who is the kid who built the deck?

9 A. His name was Matt. His last name was West,  
10 Matt West.

11 Q. No relation?

12 A. No. A lot of Wests, evidently, in the  
13 Kalispell area.

14 Q. And do you know how much is in dispute in  
15 that matter, what he's saying you owe him?

16 A. I'm guessing in the neighborhood of twenty  
17 grand.

18 Q. Do you owe any attorneys fees?

19 A. Considerable.

20 Q. Can you go through a list and tell me who  
21 you owe and what?

22 A. Presently I owe Mr. Jack Crotman (phonetic)  
23 in the neighborhood I believe of fifteen/sixteen  
24 thousand dollars.

25 Q. Okay.

1 A. And I also owe Mr. Bartlett for his services  
2 as well.

3 Q. Do you know how much you owe Mr. Bartlett?

4 A. I don't know what the tab is. However, I  
5 had promised him that I would provide him a \$20,000  
6 retainer, which I've been unable to do thus far.

7 Q. Have you paid Mr. Bartlett anything for his  
8 services yet?

9 A. No, I don't think so. If I have, I don't  
10 know. Mr. Reynolds handles that as well.

11 Q. I don't know if this is the correct term to  
12 use, but is Mr. Reynolds your financial advisor?

13 A. Yes. He's really stepped forward. And his  
14 wife is an avid meditator and thinks very highly of  
15 me. And both of them have definitely wanted to see  
16 me through this time period of hardship and they have  
17 both been very, very generous and kind and  
18 supportive.

19 Q. Do you have any bank accounts?

20 A. No, I don't.

21 Q. You don't bank anywhere in Montana?

22 A. No, I don't, or elsewhere.

23 Q. That was my next question.

24 Do you have authority to sign on anybody  
25 else's bank account?

1 A. No, I don't.

2 Q. When is last time you had a bank account?

3 A. My personal -- last personal account that I  
4 had was closed in June, I believe, due to either  
5 overdraft or bank charges that had a negative balance  
6 on it, so it was closed by the bank.

7 Q. In June of 2009?

8 A. Correct.

9 Q. What bank was that?

10 A. That was Flathead Bank.

11 Q. Where are they located?

12 A. Well, they are located in Kalispell, out by  
13 the Target area.

14 Q. At the Target store?

15 A. Out in that big Costco/Target area is where  
16 Flathead Bank is. They have a few branches around as  
17 well.

18 Q. I apologize. There is a target range area.

19 A. Oh, I'm sorry.

20 Q. I didn't know if you meant the store or if  
21 you were referring to an area.

22 And does Flathead Bank have a location in  
23 Lakeside?

24 A. Correct. I think a few, as I said. I'm  
25 pretty sure they have one in Big Fork also.

1 Q. Would you be willing to provide us with the  
2 transaction history for that bank account?

3 A. No problem.

4 Q. I actually have an authorization if you'd be  
5 willing to sign it. And Mr. Bartlett, why don't you  
6 take a look at it. We can go off the record for a  
7 second.

8 (Brief pause.)

9 MR. WILLMORE: Back on the record. Mr.  
10 Bartlett, as we just discussed, the Social Security  
11 information regarding your client, we'll only use the  
12 last four digits in the transcript. And the Social  
13 Security information put on the authorization for  
14 release of bank records, we will not provide that  
15 Social Security number to Mr. Watson.

16 MR. BARTLETT: Yes. And then we'll modify  
17 the agreement. We'll give you authorization today.

18 MR. WILLMORE: Perfect.

19 Q. Other than Flathead Bank, have you had any  
20 other personal accounts?

21 A. A couple of years ago I had an account with  
22 Wells Fargo.

23 Q. When did that account close?

24 A. A couple years ago.

25 Q. Wells Fargo in Kalispell?



1 A. Correct.  
 2 Q. Are you also willing to provide us with the  
 3 transaction history for that account?  
 4 A. Sure.  
 5 Q. Any other bank accounts?  
 6 A. None whatsoever.  
 7 Q. Any other accounts for a corporation or  
 8 business that you were a signee on?  
 9 A. At one point in time I had a personal  
 10 non-profit account with Flathead Bank also.  
 11 Q. Did you say non-profit?  
 12 A. Yes, the Devra Patton West Foundation.  
 13 Q. When did that close?  
 14 A. It has not closed.  
 15 Q. That's still --  
 16 A. Correct. I'm guessing there's, you know,  
 17 sixty bucks in it or something like that. I don't  
 18 know.  
 19 Q. And are you willing to provide us with a  
 20 transaction history for that account as well?  
 21 A. It would be up to you, I suppose. I really  
 22 have nothing to hide, I will guarantee you that, so I  
 23 don't have any objection. But I don't know if he  
 24 cares or not.  
 25 MR. WILLMORE: Do you want to take a minute

1 to talk to her about that?  
 2 MR. BARTLETT: Well, it will be in the name  
 3 of the Foundation. You don't have a judgment there.  
 4 If you're looking to see -- I mean if you levied  
 5 against --  
 6 A. There hasn't been any money in it for years  
 7 and there isn't any now.  
 8 MR. BARTLETT: If you levied against that  
 9 account, they're going to say there is no account  
 10 that's owned by her. If you're looking into the  
 11 Devra West Foundation to see how much money is there,  
 12 what, you got a hundred bucks?  
 13 A. Probably less.  
 14 MR. BARTLETT: All right.  
 15 A. More than fifty, less than a hundred from  
 16 what I last heard.  
 17 MR. BARTLETT: So if you're satisfied there  
 18 is no cash in there, then we would make that part of  
 19 the release so you can see how much is in there to  
 20 see if you had the ability to go after something,  
 21 that's fine.  
 22 MR. WILLMORE: Okay.  
 23 Q. So we've got the personal Flathead Bank  
 24 account, the Wells Fargo account and the Devra Patton  
 25 West Foundation account at Flathead?

1 A. Correct.  
 2 Q. Any other accounts in the past five years?  
 3 A. Oh, in the past five years? There were the  
 4 -- at Wells Fargo -- let's move forward so I can get  
 5 my chronological thing here a little bit. The  
 6 Millennium Mine account was at Wells Fargo as well as  
 7 the Sanctuary Environment account. They both have  
 8 been defunct for a couple of years now. I think I  
 9 remember Mr. Reynolds saying the bank had closed them  
 10 for outstanding bank fees or something like that.  
 11 Q. Do you know how long ago those were closed?  
 12 A. A couple of years ago.  
 13 Q. I think you already told me you don't  
 14 receive any benefits from a Trust?  
 15 A. No.  
 16 Q. Any foundations or anything like that that  
 17 you receive benefits from?  
 18 A. No.  
 19 Q. I believe you filed a petition for  
 20 dissolution two years ago, is that correct?  
 21 A. Well, again, Mr. Reynolds and I -- I'm not  
 22 really particularly interested in the financial or  
 23 business end of things. I'm a meditation teacher and  
 24 author. Traditionally I've always had other people  
 25 handle all that for me. I've never managed my own

1 checking account. I have never filled out my own --  
 2 what do you call it -- income tax forms and so on.  
 3 It's just not where I have ever participated. And so  
 4 I apologize if I'm a little bit vague on things. But  
 5 I have a general sense of things but I've never  
 6 managed anything operationally, not even my own  
 7 personal finances.  
 8 Q. That's fine, and all we can do is ask you to  
 9 do your best today.  
 10 A. Might have been my Waterloo, to be honest  
 11 with you. I should have managed my money a lot  
 12 better than I did, I guess. But at this point that's  
 13 sort of a wash.  
 14 Q. But you did file a petition for dissolution  
 15 a few years back, is that correct?  
 16 A. I guess they might have. I'm telling you  
 17 that I know that they have been defunct for a very  
 18 long time. I know that all the bank accounts were  
 19 closed. I just don't know even what a dissolution  
 20 really is. I don't know if anyone filed it or not.  
 21 I'm so sorry. If they did, Mr. Reynolds would have  
 22 done it. So he would know.  
 23 Q. I'm talking about a divorce.  
 24 A. Oh, a divorce?  
 25 Q. Sorry.

1 A. I'm sorry. I thought you were talking about  
2 these bank accounts.

3 Q. Sorry. I skipped around there and --

4 A. I'm so sorry. Yes, I finally got a divorce  
5 from my well meaning but highly problematic  
6 ex-husband, yes, a couple years ago.

7 Q. I told you there would be a bad question  
8 today. Did you list that you had trusts and  
9 foundations in the petition for dissolution? That's  
10 the petition for divorce.

11 A. There might have been a listing for a family  
12 trust that I either intended to go forward with or  
13 might have been existing by then, but there wasn't  
14 anything in it. I think that was just a proactive  
15 measure that the attorney took at the time.

16 Q. And who was --

17 A. I think John Wagner in Hamilton is who  
18 handled that.

19 Q. So do you know if any trusts were set up?

20 A. I remember seeing all the paperwork for it.  
21 I do not believe that there was ever a bank account  
22 or any assets or anything whatsoever was ever accrued  
23 to it, to my knowledge, at all.

24 Q. In the divorce did you reach a resolution or  
25 did you go to trial on it?

1 A. Oh, he didn't care. We'd been separated for  
2 12 years already. There was no assets to be  
3 divided. There was -- you know, he lived in close  
4 proximity for the sake of the children, and he lived  
5 a few miles away in the Victor area. And he is now  
6 residing in Kalispell for the sake of the children.

7 Q. Did you have a marital property settlement  
8 agreement?

9 A. No.

10 Q. There weren't any assets to --

11 A. There were no assets.

12 Q. Did you receive any sort of maintenance or  
13 what used to be called alimony?

14 A. Heck no. Sure don't.

15 Q. Let's take a quick break, if you don't  
16 mind.

17 (Short break.)

18 Q. Are you ready, Ms. West?

19 A. Sure.

20 Q. Were you ever a sponsor for a multi-faith  
21 peace gathering in Jerusalem?

22 A. Personally?

23 Q. Yes.

24 A. No.

25 Q. Were any of your businesses a sponsor?

1 A. No. The non-profit participated in it but  
2 did not sponsor it. You've got to be -- there are so  
3 many peace promise marches and all this, some of  
4 which had no real -- not much organization to it  
5 whatsoever.

6 Q. So when you say participated --

7 A. Invited to attend.

8 Q. So no funds were given to?

9 A. Pardon?

10 Q. They didn't provide funds?

11 A. Who is they?

12 Q. You said the non-profit participated. Did  
13 the non-profit provide funds?

14 A. For these -- well, separate it out. The  
15 Peace Promise Initiative had to my knowledge three  
16 expo's, seminar symposium type of things. But then  
17 it was also -- I as a spokesperson was oftentimes  
18 invited to attend. But the umbrella for this whole  
19 thing was the original non-profit. And in fact, one  
20 of the enormous blunders that Mr. Watson probably  
21 broke bylaws over, I would assume, is separating all  
22 of these projects out into separate corporate  
23 entities. However, the Peace Promise Initiative was  
24 a project name, it was not a business entity name,  
25 neither profit nor non-profit.

1 Q. And when you're invited to speak at these  
2 events, who is paying for you to travel?

3 A. Whichever benefactor takes a fancy to the  
4 endeavor. Various people over the years. Sometimes  
5 I really wasn't informed who was picking up the tab.

6 Q. I believe your website at one point  
7 identified you as a sponsor of orphan programs in  
8 Nepal and Tibet?

9 A. Once again, that was done under the  
10 non-profit banner.

11 Q. Do you know what the cost of the sponsorship  
12 was?

13 A. It wasn't a specific cost or sponsorship. I  
14 had engaged in years of meditation at the Tenboche  
15 Monastery, which is near base camp of Mt. Everest,,  
16 and we would essentially empty our pockets every time  
17 we left there. And the people that would be  
18 sponsoring those journeys would also give money to  
19 the Monastery. And I'm guessing over the years --  
20 it's hard to say -- perhaps -- I mean I'm really just  
21 guessing, a hundred thousand dollars over the years  
22 was given to that Monastery, because the Sherpas who  
23 died on Mt. Everest would leave behind orphans.

24 There were some 60 orphans that lived there.

25 But I was invited -- actually the only

1 outsider, the only American, certainly the only woman  
2 who was invited into the Monastery. And I was  
3 essentially allowed to be there for months at a time,  
4 weeks at a time. I normally had a small group of  
5 meditators, and I was being trained in very select  
6 meditation techniques by the Rempishay (phonetic)  
7 there.

8 Q. And how long ago was this?

9 A. It took place over many years. I haven't  
10 been up to the Mt. Everest casi since, I'm guessing,  
11 2001, 2002, something like that.

12 Q. And earlier did you testify that you're no  
13 longer traveling and putting on --

14 A. Earlier I testified -- you got to give me  
15 some frame, please. Sorry.

16 Q. Sorry. When I ask a bad question, you can  
17 call me on it.

18 A. Sure.

19 Q. Earlier today I think you testified that  
20 you're no longer traveling?

21 A. I'm no longer on the lecture circuit as I  
22 had been before going to four to five countries a  
23 month. No, I'm not on the lecture circuit any  
24 longer.

25 Q. When is the last time you gave a lecture?

1 difficult to continue to present yourself as  
2 legitimate. So it boils down to Mr. Watson, and  
3 perhaps yourself, finally realizing that if you kill  
4 the milk cow you cannot milk it.

5 Q. How many books have you written?

6 A. Four or five.

7 Q. Are you writing any new books currently?

8 A. Yes.

9 Q. Do you have any sort of publishing or  
10 distribution deal?

11 A. No.

12 Q. Are you still in contact with Corrin Coffin?

13 A. No.

14 Q. When is the last time you had contact with  
15 her?

16 A. She attended a meditation retreat, I'm  
17 guessing 2002, 2003. After Mr. Watson threatened her  
18 excessively she broke all ties with me.

19 Q. And you're still in touch with Mr. Williams,  
20 Dr. Julio Williams?

21 A. I never talk to him.

22 Q. But he occasionally provides you funds?

23 A. Regularly provides me funds.

24 Q. Has he ever provided you a substantial  
25 amount, say a hundred thousand dollars?

1 A. Last time I gave a lecture?

2 Q. Maybe I should qualify that. What was the  
3 last time --

4 A. A public lecture in an auditorium, it's been  
5 many years.

6 Q. When is the last time you gave a public  
7 lecture that you were paid for?

8 A. I'm guessing seven or eight years ago. As I  
9 said, Mr. Watson very diligently destroyed my  
10 reputation as a meditation teacher.

11 Q. Are you receiving income from any sources?

12 A. None whatsoever.

13 Q. Do you receive anything from sale of books,  
14 CDs, DVDs?

15 A. No.

16 Q. But you have items available. On your  
17 website you used to have books available, correct?

18 A. Right. But they never got it together to  
19 price the books or do Pay Pal or anything, so nobody  
20 could buy them. No, the website, we never had the  
21 money to develop the website to receive money.

22 Q. And you have a book listed on Amazon,  
23 correct?

24 A. Correct. No sales whatsoever. When your  
25 representation has been destroyed it's pretty

1 A. Not to my knowledge.

2 Q. And Mr. Reynolds would have knowledge about  
3 that if it occurred?

4 A. He would.

5 Q. Have you ever received any inheritance?

6 A. No. Well, that's not true. When my father  
7 died I received \$10,000.

8 Q. And when was that?

9 A. Three years ago this coming January.

10 Q. Did you receive any property?

11 A. No, I did not.

12 Q. Was there a will?

13 A. If there was, I never saw it. My  
14 step-mother wasn't particularly gracious.

15 Q. So how did it come about that you received  
16 the 10,000, then?

17 A. The bank in which he had put it contacted me  
18 and asked me to sign some papers, and they sent the  
19 money.

20 Q. Do you remember what bank that was?

21 A. No.

22 Q. Do you have any of those documents still  
23 from that?

24 A. I wouldn't know. If I did, Mr. Reynolds  
25 would have it.

- 1 Q. And if you --  
 2 A. I know the town that it's in. That's about  
 3 all that I know.  
 4 Q. If you have those documents, are you willing  
 5 to provide them to us?  
 6 A. No problem.  
 7 Q. Are you involved in any businesses  
 8 currently?  
 9 A. No.  
 10 Q. You're not a consultant, an officer --  
 11 A. No.  
 12 Q. -- director?  
 13 A. No.  
 14 Q. Millennium Mine is a name that gets thrown  
 15 out a lot. What is the correct title for that  
 16 entity?  
 17 A. There is no title for it existing that I  
 18 know of presently.  
 19 Q. It's not currently active?  
 20 A. Absolutely not. Hasn't been for years.  
 21 Q. Is there a particular reason why it's  
 22 inactive?  
 23 A. Mr. Watson made any and all endeavors that I  
 24 might ever want to engage for now well into the  
 25 future impossible.

- 1 Q. How about Sura Enterprises Unlimited,  
 2 Incorporated?  
 3 A. It hobbled along for a while and it went  
 4 defunct as well and all accounts were closed.  
 5 Q. When did that happen?  
 6 A. How long did it hobble along? As far as I  
 7 know, the accounts were closed early summer-ish of  
 8 this past year due to whatever, zero balance or bank  
 9 fees being owed or something like that.  
 10 Q. Did you ever receive any funds from that  
 11 institution?  
 12 A. No.  
 13 Q. What's the Sura Institute of Healing?  
 14 A. It was a concept that was a project of  
 15 Patricia Cole's for which I had done some conceptual  
 16 and promotional development, for which I never was  
 17 paid. And she was never able to launch it, from what  
 18 I understand.  
 19 Q. So it's not an active entity?  
 20 A. No. I don't think it was ever a legal  
 21 entity that I know of.  
 22 Q. And you never received any funds?  
 23 A. No.  
 24 Q. Did you ever solicit any funds or donations  
 25 for it?

- 1 A. Did I personally? Hell, no. I was not too  
 2 happy with Patricia Cole, and I was adamant that I  
 3 was not doing anything pro bono for her.  
 4 Q. How about the Sura Sanctuary Spa? Is that  
 5 --  
 6 A. Never was launched. Never was capitalized.  
 7 Q. Was that another idea of Patricia Cole's or  
 8 was that some other concept?  
 9 A. It was actually -- I don't know. You're  
 10 throwing out a name for something that was never  
 11 started at all or funded whatsoever. The spa idea  
 12 originated with Corrin Coffin.  
 13 Q. So that was not an active entity?  
 14 A. No. It was never capitalized. She had  
 15 considered capitalizing it but, you know, people just  
 16 really got a very bad taste in their mouth after  
 17 dealing with Mr. Watson's shenanigans and antics and  
 18 pretty much just bailed on everything.  
 19 Q. Fire of Mind Publishing?  
 20 A. That is a sole proprietorship.  
 21 Q. Who is the sole proprietor?  
 22 A. Correct.  
 23 Q. You are?  
 24 A. Correct.  
 25 Q. What type of business is it?

- 1 A. That's my books.  
 2 Q. Are you registered in Montana or in another  
 3 state?  
 4 A. I don't know if it's registered at all, to  
 5 be honest with you. You would have to ask Mr.  
 6 Reynolds. There's been no money coming into it or  
 7 out of it, no books have been sold. You know, the  
 8 projects that I'm working on right now are years in  
 9 the making and have no real commercial value.  
 10 Q. So you've never received any funds from Fire  
 11 of Mind Publishing?  
 12 A. Yeah, like minimal. I would say less than a  
 13 thousand dollars. Sorry.  
 14 Q. That's all right. And it was probably years  
 15 ago?  
 16 A. True, probably years ago.  
 17 Q. What's the Global Guardianship Initiative?  
 18 A. That was a non-profit that was originally  
 19 organized to be an educational entity to do  
 20 international humanitarian work.  
 21 Q. What was your role with that organization?  
 22 A. Years ago I was an advisor.  
 23 Q. Is it still an active entity?  
 24 A. Absolutely not. That was another one that  
 25 Pat Cole managed to completely flush down the toilet.

1 Q. When did it cease to exist?

2 A. Years ago. She had big ideas, you know,  
3 that she was the new rising star of altruism or  
4 whatever, and never did any fund raising, never  
5 stacked her numbers, never pitched it in any sort of  
6 legitimate way, and basically racked up a lot of  
7 bills and then blew out.

8 Q. Did you ever do any fund raising for Global  
9 Guardianship?

10 A. Not myself personally.

11 Q. Ever receive any funds from them?

12 A. Yes, I did receive consulting fees years  
13 ago, maybe once or twice. They had proposed to me  
14 that I would be an advisor and they had proposed a  
15 salary. I think they paid it once and then defaulted  
16 on other payments. I did an enormous amount of work  
17 for Patricia Cole for that project as well as the  
18 Sura Healing Institute Project for which she did not  
19 pay me, so we ended on a very sour note.

20 Q. Do you know if the Circle of Divine Unity is  
21 still inactive?

22 A. I would imagine it's completely defunct.

23 Q. When is the last time you had involvement  
24 with them, when you last wrote the letter in January  
25 of '03-ish?

1 A. I tried to have no involvement with them at  
2 all. And I have written them numerous letters, not  
3 for the past several years because they're defunct,  
4 they've got no assets. I basically earned all the  
5 money that they had. Without me they didn't really  
6 have any viability at all, which I think was perhaps  
7 a sore discovery on Mr. Watson's case. I was the  
8 work horse of that whole organization, and it was  
9 formed only to sponsor my work. And so once I  
10 resigned they had no real viability. Whether they  
11 played around with ideas -- they may have, I'm not  
12 sure. But other than my various letters demanding  
13 money from them, I've had no real contact with them  
14 that I -- I think those letters were written mostly  
15 in 2005, you know, up to 2005-ish.

16 Q. So it's been up about four years?

17 A. Correct.

18 Q. How about Sacred Environments, LLC?

19 A. I have no connection with Sacred  
20 Environments, LLC.

21 Q. Do you know what it is?

22 A. Well, it was intended at some point in time,  
23 according to Wes Ovitt (phonetic), Jeff's wife and  
24 Mr. Reynolds and his wife have discussed with me to  
25 perhaps some day do some real estate projects. Their

1 family's money is invested in real estate. But real  
2 estate has pretty much sucked lately, so I don't  
3 really know what their private affairs are. As far  
4 as I know, they haven't done anything with it.

5 Q. So it's your understanding that that is a  
6 business of Mr. Reynolds and his wife?

7 A. Correct.

8 Q. And you have no involvement?

9 A. No.

10 Q. Is Sanctuary Environments, LLC, something  
11 different to your understanding?

12 A. Well, it was originally formed to be a  
13 company wherein spas and conference centers and so  
14 forth would be purchased. But none were ever  
15 purchased, so the company went defunct.

16 Q. Were you involved with Sanctuary  
17 Environments?

18 A. Correct, I was, and with the Millennium  
19 Mines, as you know.

20 Q. What was your involvement with Sanctuary  
21 Environments?

22 A. Owner.

23 Q. Anyone else involved in it?

24 A. My son's name was on there at some point.  
25 Pat Cole's name was on there at some point. I think

1 that's about it that I know of.

2 Q. And when did that entity go defunct?

3 A. Several years ago.

4 Q. Did you ever receive any funds from them?

5 A. No. It was never seeded.

6 Q. Other than the organizations and businesses  
7 that we've talked about today, are you involved with  
8 any other?

9 A. No, I really am not.

10 Q. And I believe around March on your website  
11 there were multiple positions listed with various  
12 entities?

13 A. I wouldn't know.

14 Q. Who runs the website?

15 A. Well, no one really.

16 Q. Who ran the website back in March of '09?

17 A. Probably no one, really.

18 Q. Who would have put listings on the website?

19 A. Well, the person who worked on it, his name  
20 was Brett Yahola, or something like that. I don't  
21 know how to spell his last name. A guy named Brett  
22 did the website. But much of what was on there was  
23 outdated. They never updated it. I don't -- it's  
24 not something that I paid a lot of attention to one  
25 way or the other.

1 Q. Would Mr. Reynolds have been involved with  
2 the website?

3 A. Well, he tried to oversee it somewhat. I  
4 can't say he did. I was not particularly happy with  
5 anything that any of them created regarding that  
6 website.

7 Q. But at this point the business is defunct,  
8 correct?

9 A. Right.

10 Q. So you're not seeking new employees?

11 A. No.

12 Q. I think at one point you were also seeking  
13 personal staff positions, is that correct?

14 A. Well, over the years we had hoped to launch  
15 something that was viable and legitimate. But our  
16 efforts to get Watson's websites down, which my  
17 credibility is very dependent upon, have not been  
18 successful. He mostly -- all the U.S. servers shut  
19 him down. But then he will go to some obscure place  
20 in the United Emirates or something like that. So  
21 basically he destroyed my representation and severed  
22 my capacity to have a livelihood. It's kind of  
23 ironic, if you really think about it.

24 Q. So there's no personal staff positions  
25 currently filled, is that correct?

1 A. Absolutely none.

2 Q. Were they ever filled?

3 A. Meaning what?

4 Q. Well, in March of '09, for example, there  
5 was an estate home manager position posted.

6 A. Never filled. And again, if you monitored  
7 that website you would see that stuff has been on  
8 there for years.

9 Q. I want to talk to you a little bit about  
10 this bad check case.

11 A. Sure.

12 Q. Can you tell me a little bit about how a six  
13 and a half million dollar check came about?

14 MR. BARTLETT: I think that's irrelevant and  
15 I instruct her not to testify, primarily because  
16 she's been charged and anything that she says can be  
17 used against her. And I'm her criminal attorney on  
18 that and my guess is it will probably be dismissed.  
19 The deputy county attorney wants to dismiss it. He  
20 has to convince the county attorney, and we're in  
21 negotiations presently. So I would ask her not to  
22 discuss that and she'll enforce her constitutional  
23 right to remain silent because of the pending  
24 charge.

25 MR. WILLMORE: It's not resolved yet,

1 though?

2 MR. BARTLETT: No.

3 MR. WILLMORE: Is there still a warrant  
4 pending?

5 MR. BARTLETT: No. She's made an  
6 appearance.

7 MR. WILLMORE: Then I will not touch that  
8 any further.

9 A. There's nothing to it anyway, I guarantee  
10 you.

11 Q. Your attorney doesn't want you to discuss  
12 it, so I won't go there.

13 Do you have any expenses currently in your  
14 name?

15 A. I don't believe there's a single expense or  
16 bill or vendor or supplier in my name whatsoever.

17 Q. So your personal would just be food, gas?

18 A. Correct.

19 Q. Anything else that I'm missing?

20 A. Basics. Really, really, really basics.

21 Q. Explain to me, you're living in like a 5th  
22 wheel. Do I have it correct?

23 A. Correct, with the exception of when I'm --  
24 you know, for years it has been my desire with some  
25 friends of mine who have also recently retired to

1 travel about to national parks and so forth, so I've  
2 done a fair amount of traveling in their motorhome  
3 and so on. And I have the travel trailer available  
4 to me whenever I'm here in Montana.

5 Q. And who owns that?

6 A. Mr. Reynolds and his wife.

7 Q. Do you have any debts to the IRS?

8 A. Probably.

9 Q. Mr. Reynolds would know?

10 A. Correct. There was employee wages, I  
11 believe, still owed from the Sura Unlimited company.  
12 And it's in debt. It's defunct because it's in  
13 debt.

14 Q. I think back when this case first started  
15 before we were involved, you had indicated in some  
16 discovery responses that you provided for your  
17 children.

18 A. To be clear, I'm not quite sure. Help me to  
19 --

20 Q. Written discovery. The previous attorney  
21 had sent what are called discovery requests where  
22 it's a written question and you would provide an  
23 answer in writing back.

24 A. Okay.

25 Q. Do you recall providing some sort of

1 indication that you provided financially for your  
2 children?

3 A. Oh, absolutely. That's all they're  
4 interested in me for is how much money I can give  
5 them. Pretty typical that way.

6 Q. But I think after hearing you testify today,  
7 it's no longer the case that you're able to provide  
8 financial aid to them?

9 A. Oh, I still give them small amounts of money  
10 regularly whenever I can.

11 Q. Where are you getting money to give to your  
12 children?

13 A. Once again, I receive cash from Jeff and Mr.  
14 Williams, and/or Jeff provides me with what is  
15 needed. They know my children, they love my  
16 children. If they need a few hundred bucks, they're  
17 happy to provide it.

18 Q. Have you provided any substantial gifts to  
19 your children in the last few years?

20 A. No.

21 Q. Ever provided them any land?

22 A. Any land?

23 Q. Yes.

24 A. No. I'm not that generous. Sorry.

25 Q. No, that's fine. And so when we're talking

1 about money that you'd be giving to them, we're  
2 talking --

3 A. Incidentals.

4 Q. -- a hundred bucks here and there?

5 A. Yes.

6 Q. I apologize. We're talking at the same time  
7 again.

8 A. Personal incidentals.

9 Q. Things under a thousand dollars?

10 A. Well, one of my granddaughter's dental bill  
11 was more than a thousand dollars.

12 Q. Have you made any gifts to anyone since this  
13 case has been pending?

14 A. Since Mr. Watson's case has been pending  
15 have I given any gifts to anyone? When has this case  
16 been pending from?

17 Q. June 2003 I believe is when you first  
18 appeared and answered.

19 A. Since 2003 have I given any gifts? Does  
20 that mean charitable contributions.

21 Q. I'm looking for like property transfers --

22 A. Oh, no, absolutely not. I gave some money  
23 to the Rotary Club in Big Fork. I gave some money to  
24 Montana Land Reliance; this is years ago. I gave  
25 some money to the Big Fork Elementary School.

1 Q. How much money are we talking about when you  
2 give these gifts?

3 A. Less than 5,000. But that would have been  
4 years ago.

5 Q. Have there been any gifts in the last year?

6 A. No.

7 Q. Two years?

8 A. No.

9 Q. Three years?

10 A. Probably not. I don't think so. It would  
11 have been some time ago, five/six years ago.

12 Q. I believe you told me that the property in  
13 Denver -- or not Denver but Colorado was sold?

14 A. Correct.

15 Q. Have there been any other properties  
16 transferred?

17 A. No.

18 Q. And who would have information about the  
19 Colorado transfer, your son?

20 A. Yes, my son would. But I would imagine that  
21 Jeff was overseeing anything. You know, I come from  
22 a generation where the men handled the money. I

23 don't really handle it or relate to it. I know that  
24 probably sounds kind of stupid, but --

25 Q. No. My wife doesn't pay bills either, so I

1 understand completely. So Jeff Reynolds would have  
2 information about that property transfer?

3 A. Correct.

4 Q. And that's the only one you can think that's  
5 been transferred?

6 A. Other than the Naka Shela one that's been  
7 foreclosed upon. I guess that transferred back to  
8 its -- whoever -- yeah, the loan people.

9 Q. Do you have any jewelry that is worth a  
10 substantial amount?

11 A. No. A handful.

12 Q. Did you ever at one time have?

13 A. Oh yes, I certainly did at one time.

14 Q. Ever have a substantial amount of emeralds?

15 A. No. No. I am so sorry. I mean what can I  
16 say? I think you pretty much -- I think Mr. Watson  
17 is really off his rocker. And I'm very sorry so many  
18 people have been so unbelievably misled. But no,  
19 I've never had any, not even a single emerald, let  
20 alone numerous ones.

21 Q. Okay. Any other substantial jewelry that  
22 you have now?

23 A. No.

24 Q. Do you have any insurance on jewelry?

25 A. No.

1 Q. Did you ever receive a watch from Corrin  
2 Coffin?  
3 A. Yes. I received a gorgeous Rolex from  
4 Corrin Coffin.  
5 Q. Where is that today?  
6 A. It was stolen.  
7 Q. When was it stolen?  
8 A. It was stolen when I moved into the Bayview  
9 home. And I suspected that one of the young kids  
10 that were working for the moving company had stolen  
11 it, but I didn't really discover it until several  
12 months after the moving company had been in the home  
13 so I never did anything about it.  
14 Q. It wasn't insured?  
15 A. No.  
16 Q. When did you move to the Bayview home again?  
17 A. A few years ago. You know, I was there on  
18 and off for about year and a half. So if you want to  
19 count back, we can kind of figure it out.  
20 Q. An approximation is fine. It was a few  
21 years ago?  
22 A. Let's see. If I moved -- I think that that  
23 would be April of 2008, I think, in that  
24 neighborhood. I was at the Waterside Condos before  
25 then.

1 Q. Do you have any insurance policies  
2 currently?  
3 A. None whatsoever.  
4 Q. No life?  
5 A. None.  
6 Q. Nothing for personal items?  
7 A. None whatsoever. No health insurance,  
8 nothing.  
9 Q. You don't have a car?  
10 A. No.  
11 Q. I'm taking it from today that --  
12 A. Sorry. The milk cow is dead.  
13 Q. That's why we're here. We're trying to find  
14 out what assets you may have.  
15 A. Well, if I have any I'd sure like to know  
16 myself.  
17 Q. And so I take it that the answer to this  
18 question is none, but what assets do you have in your  
19 name?  
20 A. None. Well, I have a couple of suitcases of  
21 clothing, a few books. That sums it up.  
22 Q. Any assets that you use that are in the name  
23 of others?  
24 A. What do you mean, like the travel trailer?  
25 Q. That's probably the only thing that I found

1 out today.  
2 A. That's what I can think. Sometimes people  
3 lend me their car -- on a temporary basis.  
4 Q. Have you ever identified that you had  
5 \$110,000 in jewelry on any loan applications?  
6 A. I personally have never done that. I do  
7 know that the non-profit very much tried to use my  
8 assets to get loans for themselves at one point in  
9 time. But I could easily have had that much in  
10 jewelry years ago.  
11 Q. And where did the jewelry go?  
12 A. Some of it was stolen, as I said, and some  
13 of it was pawned or given away or sold -- I sold one  
14 ring here locally to some jewelry store -- and things  
15 along that line. I have none of it left. It all had  
16 to go years ago to pay bills and to survive.  
17 Q. You mentioned you may have given some away?  
18 A. Minor items.  
19 Q. Who would you have given it to?  
20 A. My daughter or granddaughters type of  
21 thing. Or gifts to people that had done me favors  
22 along the line. But it wasn't because the jewelry  
23 had great value; it was because it was a sentimental  
24 thank you from myself.  
25 Q. Did you ever have numerous pieces of art?

1 A. At one point in time I had some art. Again,  
2 a great deal of it was stolen as well.  
3 (Exhibit 1 marked for Identification.)  
4 Q. If you would take a look at that, Ms. West.  
5 Have you seen that document before?  
6 A. Yes, I sure have.  
7 Q. Can you tell me what it is?  
8 A. This was created by some of the non-profit  
9 people. It was shown to me. They were trying to I  
10 believe at the time convince me to become involved in  
11 trying to -- they were trying to not lose the  
12 property down there. It was I think -- I'm thinking  
13 they were late on their payments or whatever. So  
14 this was created by a couple of people.  
15 Most of it is pretty far-fetched. I mean I  
16 can tell by looking at it that the monies -- and I  
17 told them that I thought this was ridiculous. I  
18 thought that, you know, it was pretty crazy. I mean,  
19 I really walked away from my life. I walked away  
20 from all of my possessions. All of this stuff was  
21 left at Naka Shela for over a year and a half. The  
22 property has been entirely furnished with my personal  
23 family's furniture and so on. And by the time they  
24 got around to actually transporting my items back to  
25 me, well over half of it had been carted off. Entire



1 rooms full of furniture were missing, had been carted  
2 off, as well as a great deal of this.

3 Anything that was really of value has been  
4 sold. I mean, I know that I sold a few things way  
5 back when years ago. Do you have any other questions  
6 about this? I didn't create the list.

7 Q. Who did create it?

8 A. It was not my doing. It was not something  
9 that I created or wanted to create or participated in  
10 creating it. I know that perhaps -- I really  
11 couldn't say. I know who might have been involved; I  
12 really couldn't say who actually did it. The  
13 organization was so loosely formed and  
14 scatter-brained, and they never really had specific  
15 committees other than in lip service. You know, they  
16 would come to these retreats and gather together in  
17 little circles. But once everybody went home you  
18 never knew who was doing what. It was pretty hard to  
19 tell.

20 I think an Esther, somebody named Esther  
21 that they had had for a consultant there for a while,  
22 I recall her being the one who actually gave me this.

23 Q. Esther Michaels?

24 A. Maybe so, correct. I know a large gal with  
25 dark hair --

1 some collateral.

2 Q. And so only some items on here were your  
3 items?

4 A. I would have to go -- I remember seeing  
5 this, Ryan. I do remember seeing it. I remember  
6 laughing. I remember -- you know, I went through  
7 something like ten years of hairbrained stuff which I  
8 would have to say that Mr. Watson's delusional antics  
9 were definitely the cream on the top of the birthday  
10 cake on this to the point where it was just like, you  
11 know, how woo-woo do you people want to get? I was  
12 so fed up with all of it and their delusional ideas  
13 about things. You know, I don't know what to say. I  
14 don't have any of this now.

15 Q. That was my question.

16 A. There was a painting that was auctioned  
17 years ago that was worth something, but that money  
18 didn't go into my personal pocket; I believe it went  
19 into the Global Guardianship at that point in time.  
20 It had been a donation from one of the students. You  
21 know, I mean stuff really got dispersed. I really  
22 ended up with nothing.

23 Q. So from the sale or transfer of any of these  
24 items of art you didn't receive any funds?

25 A. No.

1 Q. I don't know.

2 A. -- named Esther.

3 Q. And this inventory of art, are those all  
4 pieces that were yours personally?

5 A. No.

6 Q. Who owns these pieces?

7 A. Well, some of it was my personal stuff.  
8 Some of it was sitting around there at the retreat  
9 center. Who knows who provided it?

10 Oh, here is a good example. This little  
11 stained glass dove thing from Helen Wolf, she had  
12 been a student. It was about this big. It had been  
13 given to the meditation hall as a gift from her.  
14 Would you call something worth ten thousand dollars  
15 that big? You know, what can I say?

16 Q. And what was the purpose of this list being  
17 created, or your understanding?

18 A. They were trying to -- as far as I can tell  
19 they were trying to put forth some legitimacy. I  
20 don't think these people knew what they were doing.  
21 They were trying to appear legitimate. They were  
22 trying to appear as though there were assets. The  
23 fact of the matter is it wouldn't have mattered. The  
24 bank would have said we don't give a hoot about this  
25 stuff. If you want a loan, go sell it and create

1 Q. And you have none of these items today?

2 A. No.

3 MR. WILLMORE: I think if we take one last  
4 short break we'll be pretty close to being wrapped.  
5 All right?

6 A. Uh-huh.

7 (Short break.)

8 Q. Ms. West, from your testimony today, I take  
9 it that most of the information regarding the  
10 financial affairs would be better addressed to  
11 Jeffrey Reynolds?

12 A. He would have the details and records and  
13 documents. He's a CPA.

14 Q. And Mr. Reynolds' address is the same  
15 address as your current address, correct?

16 A. Correct.

17 Q. And do you have a telephone number for him?

18 A. Sure. 270-8050.

19 Q. And you've also indicated today that you're  
20 willing to provide us documents?

21 A. He would be. I have never seen them, had  
22 them in my hands or in any way related to them.

23 Q. If I write a letter to your attorney asking  
24 him for documents, you're willing to provide those  
25 documents to him to provide to me?

1 A. It depends on what you're requesting and  
 2 whether or not I have any authority over them.  
 3 Q. Right. But the documents we discussed today  
 4 in your testimony that you said you would be willing  
 5 to provide?  
 6 A. Sure. If I told you a yes already on those  
 7 questions, then it would be yes.  
 8 Q. And Mr. Reynolds and Mr. Williams  
 9 essentially are providing for you financially, is  
 10 that accurate?  
 11 A. That's right.  
 12 Q. Can you give me a little insight on how that  
 13 works, since you don't have a bank account?  
 14 A. I know that sometimes Mr. Reynolds sends  
 15 things to -- I mean Mr. -- Dr. Williams sends cash to  
 16 Mr. Reynolds and he picks it up at the Wal-Mart or  
 17 somewhere like that. I guess it's a wire.  
 18 Q. Like a Western Union transfer?  
 19 A. Correct.  
 20 Q. How does it work in a day to day, say you  
 21 want to go to the grocery store?  
 22 A. Oh; well, I receive sometimes four or five  
 23 hundred dollars at a time, sometimes a thousand  
 24 dollars at a time.  
 25 Q. And that's --

1 MR. BARTLETT: And I'll need copies of  
 2 those, too.  
 3 MR. WILLMORE: We'll make copies of those,  
 4 and we're wrapped.  
 5 (Signature reserved.).  
 6  
 7 (Deposition concluded 12:20 p.m.)  
 8  
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 25

1 A. To pay for personal expenses.  
 2 Q. And that's just Mr. Reynolds handing you  
 3 cash?  
 4 A. That's right. Yes, it is. I'm very, very  
 5 grateful for the support that I've received.  
 6 Q. And your responses today have been true and  
 7 accurate?  
 8 A. Yes.  
 9 Q. And you realize it's a matter of public  
 10 record?  
 11 A. Sure.  
 12 MR. WILLMORE: That is all I have for you.  
 13 I thank you for coming today.  
 14 MR. BARTLETT: While we're on the record,  
 15 we've asked that you stipulate to have the Court then  
 16 dismiss the outstanding order on contempt. We're  
 17 supposed to report back to the Judge. So I'll  
 18 prepare it and I'll send it down and ask that that  
 19 gets done.  
 20 MR. WILLMORE: Yes. It's my understanding  
 21 he was reserving ruling on contempt for this to  
 22 happen.  
 23 MR. BARTLETT: Right. So we attended, so  
 24 I'll do the paperwork and get that done.  
 25 MR. WILLMORE: Okay.

1 CERTIFICATE OF WITNESS  
 2 PAGE LINE  
 3  
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 11  
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 13  
 14  
 15  
 16  
 17  
 18 I hereby certify that this is a true and correct  
 19 copy of my testimony, together with any changes I  
 20 have made on this and any subsequent pages attached  
 21 thereto.  
 22 Dated on this, the day of  
 23 , 2009.  
 24 \_\_\_\_\_  
 25

1 CERTIFICATE  
 2 STATE OF MONTANA )  
 : ss  
 3 COUNTY OF RAVALLI )  
 4 I, Stephen D. Gerger, CSR, Freelance Court  
 Reporter, Notary Public for the State of Montana,  
 5 residing in Corvallis, Montana, do hereby certify:  
 6 That I was authorized to and did report the  
 deposition of the witness as noted in this  
 7 transcript;  
 That the reading and signing of the  
 8 deposition by the witness have been expressly  
 reserved;  
 9 That the foregoing pages of this deposition  
 constitute a true and accurate transcription of my  
 10 stenotype notes of the testimony of said witness.  
 11 I further certify that I am not an attorney  
 nor counsel of any of the parties; nor a relative or  
 12 employee of any attorney or counsel connected with  
 the action, nor financially interested in the  
 13 action.  
 14 IN WITNESS WHEREOF, I have hereunto set my  
 hand and seal on this, the 19th of October, 2009.  
 15  
 16  
 17 Stephen D. Gerger, CSR  
 Freelance Court Reporter  
 18  
 19  
 20  
 21  
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1  
 2  
 3 RYAN C. WILLMORE, Esq.  
 Browning, Kaleczyc, Berry and Hoven, P.C.  
 4 Northern Pacific Building  
 100 West Railroad Street Suite 200  
 5 Missoula, Montana 59802  
 6  
 RE: JOHN WATSON vs DEVRA WEST  
 7 Cause No. DV-03-145, Ravalli County  
 8  
 PLEASE ATTACH TO YOUR COPY OF THE DEPOSITION OF:  
 9  
 DEVRA PATTON WEST  
 10 October 9, 2009  
 11  
 12 Please find enclosed the Original Deposition  
 in the above-named case. It has been read and  
 signed. We are now delivering it to you since you  
 13 were the ordering party.  
 14  
 15  
 16 The time for reading and signing has passed,  
 and we are delivering the Original Deposition to you  
 since you were the ordering party.  
 17  
 18  
 19 Rona MacDonald, Office Assistant  
 20 Date: \_\_\_\_\_  
 21  
 22

cc: James Bartlett, Esq.

1  
 2  
 3 October 19, 2009  
 4  
 JAMES C. BARTLETT, Esq.  
 5 Attorney at Law  
 P.O. Box 2819  
 6 Kalispell, Montana 59903-2819  
 7  
 In Re: JOHN WATSON vs DEVRA WEST  
 8 Deposition of Devra Patton West  
 9 Dear Mr. Bartlett,  
 10 Please find attached your copy of the deposition  
 mentioned above. Have the deponent read and sign the  
 11 deposition, noting any corrections on the  
 attached "CORRECTIONS TO DEPOSITION" page, and return  
 12 the corrections page to our office in the enclosed  
 envelope.  
 13  
 14 You have 30 days to accomplish reading. After that  
 we will note on the release letter that the witness  
 has waived the right to read the deposition, and we  
 15 will deliver the original to the ordering party.  
 16 If you have any questions, please feel free to give  
 me a call.  
 17  
 Sincerely,  
 18  
 JEFFRIES COURT REPORTING, INC.  
 19  
 20  
 Carol Gilliland  
 21 Office Manager  
 22 cc: Mr. Willmore  
 23  
 Attachment  
 24  
 25