

## Exhibit 4

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1 people, for the grace of God, are letting you not pay  
2 it?

3 A. I don't know if you need to bring God into  
4 this.

5 Q. Well, whatever. In their good graces are not  
6 let -- are not complaining about the fact that their  
7 bills are not gating paid?

8 A. Yeah, I guess, yes.

9 Q. Okay. Do you personally contribute any money  
10 towards the expense of Xcentric?

11 MS. SPETH: I'm going to object. That's not  
12 relevant and he does not have to answer a question  
13 that's not relevant. Unless you can --

14 MR. LIPPMAN: If you're going to instruct him  
15 not to answer --

16 MS. SPETH: You know --

17 MR. LIPPMAN: -- instruct him not to answer.

18 MS. SPETH: Steve, let me -- let me say  
19 something.

20 THE WITNESS: Why don't you get a decision on  
21 that?

22 MS. SPETH: Hang on. Hang on.

23 Steven, if you can tell me what the relevance  
24 of that is as to any claim of defense in this case, I  
25 might reconsider.

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1 MR. LIPPMAN: It goes to his bias. I just  
2 want to know what his personal interest is in this. If  
3 he's putting in \$10 a year, maybe not. If he's putting  
4 in \$10 million a year for this venture, it may go to his  
5 bias. I don't know. I just want to know the answer.

6 MS. SPETH: All right. I don't still don't  
7 think it's relevant.

8 **Q. BY MR. LIPPMAN: Do you put any money of your**  
9 **own personal money in to keep Xcentric Ventures running?**

10 MS. SPETH: Once again, you are not re- -- you  
11 are not required to answer irrelevant questions about  
12 your own personal finances.

13 **Q. BY MR. LIPPMAN: Well, I disagree with that.**  
14 **You are required to answer --**

15 MS. SPETH: You can get a ruling from the  
16 judge.

17 MR. LIPPMAN: -- any question unless it's  
18 privileged. You can certainly raise a relevance  
19 objection, but that's not the basis to instruct somebody  
20 not to answer a question. And it's not a basis not to  
21 answer a question.

22 MS. SPETH: Of course, it is. It's a basis  
23 that you have no right to answer (sic) the question.  
24 It's called an objection.

25 MR. LIPPMAN: Okay.

1 THE WITNESS: I guess you guys went to  
2 different law schools.

3 Q. BY MR. LIPPMAN: Yeah.

4 MS. SPETH: Apparently we read different rule  
5 books because the rule book I read says you don't have  
6 to answer it if it's not relevant.

7 MR. LIPPMAN: Well, when it says subject to  
8 objections, that's what it means by subject to  
9 objections.

10 MS. SPETH: If you can show me that --

11 THE WITNESS: Calm down. Let's get to --  
12 let's keep questioning.

13 Q. BY MR. LIPPMAN: The answer is?

14 A. I'm going to hold off on that question.

15 Q. You're going to refuse to answer that  
16 question?

17 A. At this time, yes.

18 Q. Okay. How much money in 2007 have you  
19 contributed to keep Xcentric Ventures running?

20 MS. SPETH: You're going to play this game,  
21 huh?

22 MR. LIPPMAN: Well, I got to ask the question.

23 MS. SPETH: Objection, relevance.

24 MR. LIPPMAN: If you're going to instruct him  
25 not to answer, just instruct him not to answer.

1 MS. SPETH: I don't think I can instruct him  
2 not to answer. I'm telling you your question isn't  
3 relevant. And I'm also telling you that at some point a  
4 court can rule on this. But until a court rules on it,  
5 I don't believe a witness has to answer personal  
6 questions about their own personal finances that are not  
7 relevant to the case.

8 By the way, why don't you ask him the last  
9 time he went to the doctor and what his, you know, urine  
10 test said, because you think you can ask him anything.

11 MR. LIPPMAN: I could care less about that.

12 MS. SPETH: Right. And you shouldn't care  
13 less about personal finances.

14 MR. LIPPMAN: Let's move on. If he's not  
15 going to answer, just don't answer.

16 THE WITNESS: You can't take a urine test in  
17 place of that?

18 **Q. BY MR. LIPPMAN: Sir, I'm just asking you the**  
19 **question. How much did you contribute to keep Xcentric**  
20 **Ventures running in 2007?**

21 MS. SPETH: And I'm going to object.

22 THE WITNESS: I don't see what --

23 **Q. BY MR. LIPPMAN: And if you're not going to**  
24 **answer, just tell me you're not going to answer.**

25 A. I don't see what it's relevant to, like,

1 truthfulness of the reports or who posted the reports.

2 Q. Sir, if you're not going to answer, just tell  
3 me you're not going to answer.

4 A. Okay.

5 Q. I just want to move it along.

6 A. Yeah, just not -- no.

7 Q. Okay. What about in 2006, how much money did  
8 you contribute to Xcentric?

9 A. Why would that change?

10 MS. SPETH: Objection, relevance.

11 Q. BY MR. LIPPMAN: Just tell me you're not going  
12 to answer it. I just have to put it on the record.

13 A. I'm not going to answer that right now.

14 Q. What about 2005, would you tell me how much --

15 A. I don't want to answer anything regarding my  
16 personal finances.

17 Q. One second.

18 I'm just asking you in 2005 how much money you  
19 personally contributed to keep Xcentric Ventures  
20 running.

21 MS. SPETH: Objection, relevance.

22 Q. BY MR. LIPPMAN: Just tell me you're not going  
23 to answer. I just have to have it on the record.

24 A. Nothing. I'm not going to answer.

25 Q. Okay. And what about 2004?

1 MS. SPETH: Objection, relevance.

2 THE WITNESS: I'm not going to answer that.

3 Q. BY MR. LIPPMAN: Okay. Do you know a  
4 gentleman by the name of Dickson Earl Woodard?

5 MS. SPETH: It's too late to talk about  
6 Dickson.

7 Q. BY MR. LIPPMAN: I'm glad I made you laugh.

8 A. If you only knew. I know him -- I know of  
9 him.

10 Q. What's the -- what is or was the relationship  
11 between yourself or Rip-Off Report with Mr. Woodard?

12 A. Mr. Woodard tried to act like somebody. He  
13 wanted to be my friend, would call at 1:00, 2:00 o'clock  
14 in the morning,

15 Q. That's not one of my friends.

16 A. Okay. No, no. He tried to be -- he was just  
17 trying to be friendly. You'd be surprised when I get  
18 calls. And I just put it on speaker phone and let him  
19 speak his piece.

20 And then about four weeks later, three weeks  
21 later, the same voice calls me. I knew I recognized the  
22 voice. And I may -- I got disconnected and went back  
23 and got my tape recorder. I may not -- maybe I'm  
24 explaining too much more, but I ended up -- because I  
25 knew I was getting threatened.