

STATE OF FLORIDA
OFFICE OF THE ATTORNEY GENERAL
DEPARTMENT OF LEGAL AFFAIRS
AG # L10-3-1145

IN RE:
INVESTIGATION OF LAW OFFICES
OF DAVID J. STERN, P.A.

DEPOSITION OF MARY R. CORDOVA

1:59 p.m. - 2:29 p.m.

September 23, 2010

Office of the Attorney General
110 Southeast 6th Street, 10th Floor
Fort Lauderdale, Florida 33301

Reported By:

Kalandra Smith
Notary Public, State of Florida
Apex Reporting Group
Phone - 954.467.8204

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APPEARANCES:
ON BEHALF OF THE STATE:
JUNE M. CLARKSON, ASSISTANT ATTORNEY GENERAL
OFFICE OF THE ATTORNEY GENERAL
110 Southeast 6th Street, 9th Floor
Fort Lauderdale, Florida 33301

THERESA B. EDWARDS, ASSISTANT ATTORNEY GENERAL
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OFFICE OF THE ATTORNEY GENERAL
110 Southeast 6th Street, 9th Floor
Fort Lauderdale, Florida 33301

I N D E X

Name	Direct	Cross	Redirect	Recross
Ms. Cordova	3			

E X H I B I T S

Item	Page
Copy of subpoena -- Exhibit A	3
Two-page memo -- Exhibit B	20
Letter 09-09-09 -- Exhibit C	20

1 P R O C E E D I N G S

2 - - -

3 Deposition taken before Kalandra Smith, Court
4 Reporter and Notary Public in and for the State of
5 Florida at Large, in the above cause.

6 - - -

7 THEREUPON:

8 MARY CORDOVA

9 having been first duly sworn or affirmed, was examined
10 and testified as follows:

11 DIRECT EXAMINATION

12 BY MS. CLARKSON:

13 Q State your name for the record, please.

14 A My name is Mary Cordova.

15 Q Have you ever had your statement or deposition
16 taken before or sworn statement?

17 A No.

18 Q Or deposition.

19 A Bankruptcy. I filed bankruptcy.

20 Q Okay.

21 A That's it. Im not sure.

22 Q Okay. I'm going to let you know you need to
23 answer the questions verbally because noddng of the
24 head, she can't take that down.

25 A Okay.

1 Q So you need to answer verbally.

2 A Okay.

3 Q If you have any questions ask me. If you
4 don't understand what I'm asking you I'll try to
5 rephrase it in a manner that you can understand.

6 A Okay.

7 Q If you need a break just let me know.

8 A Okay.

9 Q I'm going to ask you to take a look at this
10 subpoena and ask if you recognize it.

11 A Yes, I received one.

12 Q And that's why you're here today?

13 A Yes.

14 MS. CLARKSON: We'll mark this as Exhibit A.

15 BY MS. CLARKSON:

16 Q Where do you work now?

17 A I work at Young Arts.

18 Q Young Arts?

19 A Young Arts.

20 Q What is that?

21 A It's also known as NFAA which is the National
22 Foundation for Advancement in the Arts. It's a
23 non-profit organization that supports seventeen,
24 eighteen year olds in music, dance, and the arts.

25 Q How long have you been working at Young Arts?

1 **A** Officially since May 1st.

2 **Q** Of this year?

3 **A** Yes. Full-time.

4 **Q** Where did you work before Young Arts?

5 **A** Before Young Arts I worked temporary jobs
6 through an agency and then I worked at G&Z Processing
7 Service.

8 **Q** Is that G-N-Z?

9 **A** The letter G, and, and the letter G Processing
10 Service.

11 **Q** How long did you work there?

12 **A** Approximately two months.

13 **Q** Do you remember when those two months were?

14 **A** The end of August until about October. I'm
15 not sure exactly what date.

16 **Q** Did you bring some paperwork with you today?

17 **A** I did.

18 **Q** What did you bring with you today?

19 **A** I brought with me a summary of the dates I
20 started working there.

21 **Q** This paperwork that you brought has to do with
22 G&Z?

23 **A** Yes.

24 **Q** Can I take a look at it?

25 **A** Sure.

1 **Q** What's the other paper?

2 **A** The other paper is what I gave G&Z by hand
3 delivery.

4 **Q** When did you do that?

5 **A** I don't remember the date.

6 **Q** On September 9th it says. Who is Duane?

7 **A** Duane Oberhault (ph).

8 **Q** Who is he?

9 **A** He is a person that was familiar with what was
10 happening with Stern. He gave a little background
11 information and some web links.

12 **Q** Are you familiar with what was going on with
13 Stern?

14 **A** Only through what I read in the articles.

15 **Q** What articles?

16 **A** Online. This is last year.

17 **Q** You worked at the processing company?

18 **A** Yes.

19 **Q** What did you do?

20 **A** I worked in the input department. I was
21 processing civil action summons. I was just hired to
22 enter data because I typed fast and to process serving
23 papers.

24 **Q** Were you serving papers?

25 **A** No.

1 **Q** You were processing them?

2 **A** Processing.

3 **Q** By phone?

4 **A** Yes, in the input department. They had their
5 servers serve papers.

6 **Q** Were you aware that G&Z was hired by the Stern
7 Law Office to service process?

8 **A** Yes. As a matter of fact, when I interviewed
9 on August 25th I think it was. He told me they were
10 going to be acquiring forty more cases the following
11 week so they needed somebody as soon as possible to work
12 part-time on the 19th to serve papers that were required
13 from Stern.

14 **Q** On the 19th?

15 **A** Right.

16 **Q** Did you know who owned G&Z?

17 **A** Yes, the person who interviewed me. From my
18 understanding it was two partners. Gissen and Zawyer.

19 **Q** Do you know who they are?

20 **A** They are the owners to my knowledge.

21 **Q** Do you know if they had a relationship with
22 David Stern?

23 **A** I'm not sure if David Stern was actually there
24 but they had some kind of party where a bunch of their
25 clients came over. I'm assuming that Stern was part of

1 that but I'm not sure.

2 Q Who had the party?

3 A G&Z. They had a party last year at night and
4 I was working the night shift. A bunch of their clients
5 came to the office. I wasn't introduced individually.
6 I was just working.

7 Q What kind of relationship did G&Z have with
8 David Stern as best as you can tell?

9 A That David Stern was a client of G&Z. I'm not
10 sure how many years. I don't really know the history of
11 that.

12 Q Was it an important client to G&Z?

13 A I believe so. They had other clients though
14 like Ben Ezra that they would serve papers for.

15 Q Did they treat the Stern files differently
16 than they treated the other files?

17 A I've only processed Stern files. During my
18 training we had other cases and each one that I remember
19 was handled differently for billing purposes. I think
20 Stern was like forty-five dollars per person that they
21 were serving. I'm not sure what it's called. But the
22 billing was definitely different.

23 Q Can you explain how?

24 A The amounts that were charged.

25 Q Were more amounts charged for stern or less?

1 **A** I don't recall. I don't remember.

2 **Q** But you just remember something was funky with
3 the billing?

4 **A** Right. That was during my one week training.
5 I do know we have to bill the clients in advance. It
6 wouldn't be after the fact. From what I recall it would
7 be at least four people that were being served. That's
8 the person being served, their unknown spouse, Mary Jane
9 and John Doe. So it's forty-five dollars times four.
10 That's the amount that we would do before they got
11 served or not, regardless if John Doe was served or the
12 unknown spouse was served.

13 **Q** It would still be a hundred and eighty
14 dollars?

15 **A** Right. That's what I remember.

16 **Q** What did you think about that?

17 **A** I thought that was a little unfair. I felt
18 like I wanted to question why. I kind of got the
19 impression from my trainers that we don't ask questions,
20 we just do what we are told. There was really no
21 handbook during my training as to which clients are
22 billed. I would sit with each training and -- I'm
23 trying to remember. It's been a year.

24 **Q** That's okay.

25 **A** We didn't have a manual so I was trying to

1 understand why they bill clients differently. I never
2 really got an explanation. I just typed really fast and
3 that's why I was hired.

4 Q Were you ever aware that Stern had an
5 ownership interest in G&Z?

6 A No.

7 Q Besides process serving did G&Z offer any
8 other services? Were there skip tracers in there?

9 A There were skip tracers, yes.

10 Q Were there investigators?

11 A Private investigators.

12 Q Did David Stern utilize them as well to the
13 best of your knowledge?

14 A Yes. They had an office right next to the
15 input department of about three or four individuals that
16 were skip tracers. I think they had one private
17 investigator. He was an older man. I don't recall his
18 name.

19 Q How did you become aware that Stern was using
20 them as well?

21 A Because when I was introduced during my
22 interview and after I got hired they said this is our
23 skip trace department and these are private
24 investigator/skip tracers. That's how I was introduced,
25 by title.

1 **Q** How did you know that Stern used them?

2 **A** I know that G&Z would use them. When I would
3 process the Stern papers sometimes if there's an
4 incomplete address or something like that we would have
5 to send it to the skip trace department. We'd put it on
6 top of the skip tracing file to be skip traced and try
7 to find a correct address or social or whatever was
8 missing.

9 **Q** Do you know the names of anybody that worked
10 over in that department?

11 **A** In the skip trace department?

12 **Q** Yes.

13 **A** I know Michelle Gomez worked there for about a
14 year or so. Ira I think his name is. It's a gentleman.

15 **Q** Do you know his last name?

16 **A** I don't recall. I think his name was Ira.

17 **Q** Did you ever have any discussions with
18 Michelle Gomez about the way things were being run at
19 G&Z?

20 **A** Yes, I did.

21 **Q** Could you tell me about those conversations?

22 **A** Well, she told me that they are not doing due
23 diligence or that something was not going on properly.
24 She brought it to my attention that she was asking
25 questions with the company. I didn't really understand

1 what skip tracing involved so she would tell me as if I
2 knew what due diligence is and I really didn't know
3 that. I know that she told me she would ask questions
4 about why do you do it this way and why do you do it
5 that way and I think she asked too many questions and
6 she got fired.

7 Q She got fired?

8 A Yeah, like within less than a week or so.

9 Q So how come you were there only for two
10 months?

11 A I was there only two months because I had to
12 sign a paper that said -- I wish I had that paper. They
13 gave out a paper to all employees saying if you don't
14 sign this paper you're pretty much considered fired.
15 Don't even bother coming back to work if you don't sign
16 it.

17 Q Was it a confidentiality agreement?

18 A Something like that, yeah.

19 Q What was in it that made you not want to sign
20 it?

21 A I wish I had a copy of it.

22 Q I wish you did too.

23 A It's in my email somewhere. I didn't have
24 internet at work the past couple of days.

25 Q You have a copy of it?

1 **A** I have a copy somewhere in my email, yeah.

2 **Q** Would you send it to me?

3 **A** Yes, I can send it.

4 **Q** Did you know Michelle outside of work?

5 **A** I did.

6 **Q** How did you know her?

7 **A** I met her through my fiance.

8 BY MS. EDWARDS:

9 **Q** Were you aware of any double sets of billing,
10 if there were other amounts set up for the same process
11 at the same time?

12 **A** For the same case?

13 **Q** Yes.

14 **A** No.

15 **Q** You said that there was bills sent out for
16 service when service wasn't done?

17 **A** Right. Like if John Doe got served they would
18 bill for all four.

19 **Q** So they would bill even if they didn't do
20 process fully?

21 **A** That's correct.

22 **Q** And they did it before they served anybody?

23 **A** That's correct.

24 **Q** So they didn't know how many people they would
25 be serving?

1 **A** Exactly.

2 **Q** And that was on the Stern Cases?

3 **A** That was on the Stern cases, yes. The papers
4 that I processed were mostly Stern. Myself and a
5 gentleman named Tommy were both hired to work part-time
6 from five to ten o'clock to process those papers. We
7 would deal specifically with Stern.

8 **Q** Do you know if the checks came in or how they
9 were paid? Would you handle any of that?

10 **A** No.

11 **Q** So the checks would come in to some other
12 department or somebody else that you didn't know?

13 **A** Yes, that's correct.

14 **Q** So did you mail out or you just did the
15 invoices and leave them in the office?

16 **A** I would just type them into the PST program
17 and just bill the client, which was Stern.

18 **Q** So would that just go through the software
19 system to Stern without being mailed? It was just part
20 of the system?

21 **A** Unless another department mailed it I was just
22 instructed to bill and then I believe somebody else
23 would handle that. There was another person named
24 Michelle.

25 **Q** So you were inputting the information?

1 **A** Just inputting, yes.

2 **Q** Where would you get the information from?

3 **A** The boxes would come from each county:
4 Miami-Dade County, Broward, and West Palm Beach, the
5 tri-county area.

6 **Q** They were boxes with summons in them?

7 **A** Civil action summons, yes. Some of them were
8 stamped rush. The ones that were stamped rush were the
9 ones we had to deal with first. Those are the ones we
10 had to take care of because they were late or late
11 arrivals for some reason.

12 **Q** Did you ever handle any that didn't have John
13 and Jane Doe on them?

14 **A** No. Every single case had a John and Jane
15 Doe.

16 **Q** In every single case did John and Jane Doe not
17 get served or do you know?

18 **A** I think it just depends on each case. Whoever
19 answers the door is the person that gets served.

20 **Q** But when you received the civil action summons
21 then you prepared the invoice which was then put in the
22 system before even any attempt was made to serve them?

23 **A** Yes, that's correct.

24 **Q** And from that system it was then provided to
25 Stern as far as you know?

1 **A** Then we would put the papers from there after
2 I typed them in, we'd place all four papers per county
3 depending on -- we would use a map and depending on what
4 name appears on what zip code we'd put them on their
5 mailbox to be served.

6 **Q** Did you put a copy of the invoice on it?

7 **A** No. We only put invoices into the software.
8 What I would print out is a job form or a server list
9 and stapled it right on top so that way the server makes
10 their notes on what their progress was.

11 **Q** So you don't know what the procedure was to
12 get those invoices paid?

13 **A** No. After it left my hands that's all I know.

14 **Q** Did you ever hear anything about how it got
15 paid?

16 **A** No.

17 **Q** Is there anybody who would know that from G&Z?
18 Was there anybody you dealt with at Stern's office?

19 **A** No, never.

20 **Q** So your only contact was with G&Z?

21 **A** That's correct.

22 **Q** Are you aware of anybody that handled these
23 cases for Stern from his office?

24 **A** These particular cases, I don't know. We
25 would just get boxes.

1 BY MS. CLARKSON:

2 Q Can you tell me what was it in the
3 confidentiality agreement that made you feel
4 uncomfortable or unwilling to sign? Do you recall what
5 it was? Obviously it was something, right?

6 A Yes. It was a certain paragraph that -- I'd
7 have to send it to you by email. I apologize.

8 Q That's okay. But you will send it to me?

9 A Yes. I'll highlight it and tell you this is
10 the part. It was something about being ethical or
11 unethical or something like that.

12 Q Something to do with the way that G&Z was
13 operating?

14 A Yes.

15 Q It didn't have to do with Stern? It had to do
16 with the way they were operating?

17 A Right, the way they were operating. It didn't
18 specify an particular client or anything. Can I mention
19 that when I did get hired there they were in the process
20 of implementing more security. They were setting up all
21 the computers that week that I got hired and the
22 following week so that nobody can use a USB drive to
23 copy information or anything like that. Then they were
24 just implementing more security in the company.

25 Q And their documents and for their work?

1 **A** Right. I recall that. It was a transitional
2 period.

3 **Q** Do you recall getting any complaints from
4 homeowners that their service was poor; that they didn't
5 get it; that there was papers maybe just thrown down in
6 the yard or over a fence or would that stuff not come to
7 you?

8 **A** No. If that did occur it would have to be
9 during the day when everybody was there. By the time I
10 get there thirty minutes later everybody is gone. So as
11 far as me hearing conversations or anything was very
12 limited.

13 **Q** Okay. That makes sense. So you basically
14 only worked with the night people and didn't have that
15 much contact with the day people?

16 **A** I didn't have that much contact other than
17 when I was training and in that thirty minute gap when
18 everyone is pretty much wrapping it up.

19 **Q** Did you ever hear anything or did you ever
20 notice anything that was to you made you feel
21 uncomfortable about doing work over there, specifically
22 with Stern's office besides the four names on every
23 complaint?

24 **A** Well, not with Stern but the way G&Z was
25 handling. For instance, before I got hired I looked at

1 G&Z's website and the part where they said they use
2 private investigators and skip tracers, it said that we
3 have fully licensed private investigators. There was
4 one guy Michael Gold and I mentioned him in that letter,
5 that was a skip tracer but he wasn't licensed. He was
6 still going to school. The only licensed private
7 investigator that I recall was Ira and Michelle.

8 He was talking to a lady that I think only
9 spoke Spanish. There was a language barrier. He was
10 kind of bullying her. His tone of voice was well we
11 need to serve these papers. He was acting as if he was
12 a private investigator. He's even announced himself as
13 a private investigator. He's right next to me in the
14 other office and I just felt a little uncomfortable that
15 he's claiming to be that and he's not. He was asking
16 for her address and saying we have to do this and saying
17 we'll serve it at your place of work if we need to. He
18 was really --

19 Q Bullying her?

20 A Bullying her into getting information. I just
21 kind of felt bad for the lady that he was talking to.

22 Q Nothing else about Stern?

23 A No. It was more about G&Z.

24 MS. CLARKSON: This is a two-page memo. It
25 looks like it was sent to Duane. Enter that as

1 Exhibit B. There was a letter dated September 9,
2 2009 that we'll enter as exhibit C.

3 BY MR. BRIESMEISTER:

4 Q Mary, are those copies that we can keep?

5 A You can keep those. Actually, I have copies
6 on my little hard drive.

7 Q Mary, you indicated you were there
8 approximately two months at G&Z. Can you tell us why
9 you left, under what circumstances did you leave?

10 A Because I did not agree to sign that paper
11 that everyone had to sign.

12 Q That's the only reason?

13 A That was it.

14 Q Did somebody come to you and say you must sign
15 it or else you have to leave?

16 A It was a group meeting. It was said that
17 everyone has to sign it. Don't even bother working here
18 if you don't. They told everyone that they had to sign.

19 Q Did others leave?

20 A No.

21 Q At that point in time?

22 A No.

23 Q You were the only one?

24 A I was the only one to my knowledge. I think
25 the environment from the impression I got at G&Z was

1 that people were there just for a job. They don't care
2 and they're very young and joking around a lot. It was
3 a very relaxed and playful kind of environment. I think
4 people didn't want to lose their jobs. They were just
5 grateful they had a job. I think that's why everybody
6 signed it.

7 **Q** Was it your sense there was a lot of turnover
8 at the company?

9 **A** Yes. Before I came into the picture I think a
10 week before somebody was fired. I overheard that that
11 female, and I don't know her name, either came back or
12 that same time was cursing Michelle out. She was an
13 executive at G&Z. I don't remember her last name.

14 **Q** So were there any other ex-employees or
15 current employees that you think we should speak with?

16 **A** Michelle Gomez.

17 **Q** You indicated you have a copy of the
18 confidentiality agreement in your email. Do you have
19 any other emails or documents from the company in your
20 possession?

21 **A** Not in my possession but I can definitely
22 forward them. When I did present that document, the
23 letter, I was contacted via email from one of the owners
24 saying please call us. I was like I'm not dealing with
25 it so I didn't call back.

1 **Q** That was after your departure from the
2 company?

3 **A** That was after my departure.

4 **Q** Who was it that contacted you, do you know?

5 **A** Sean Zawyer.

6 **Q** Do you know what he was trying to reach you
7 for?

8 **A** Probably trying to discuss the letter or talk
9 me about of it. I don't know.

10 **Q** Are you still in contact with any of the ex or
11 current employees?

12 **A** No.

13 **Q** Anything else we haven't asked you that you
14 feel is important for us to know about either business
15 practices or whatever at G&Z?

16 **A** When I got hired and during my interview we
17 were told, for the input department at least, that we
18 needed to process at least twenty-two cases per
19 eight-hour shift. They were very big on like rushing.

20 **Q** Productivity?

21 **A** Yeah. It was almost like we didn't have time
22 to really look at what we were doing. It's like this is
23 the particular information, input that, turn that page,
24 here's this piece of information, type that in. It's
25 more about speed than accuracy per say. Although a

1 supervisor would look at the papers to see if they're
2 pretty accurate.

3 One other thing now that you're asking me this
4 is, I do remember being curious of what these papers are
5 and I would turn to the back and see the contract, the
6 lease purchase contract. I'm not sure what it was
7 called. Of the person who purchased the home. I would
8 see if somebody was married or not. We're serving
9 unknown spouse but if you read a little bit closer you
10 can see that they're married. If they didn't have a
11 particular address it would be incorrect.

12 The cases that we received were from David
13 Stern's office to G&Z. It was probably an oversight on
14 David Stern's part. I don't know. I don't want to
15 assume that. I do remember a couple of errors in the
16 actual processing paper in the civil action. There were
17 a few instances. I can't say more than ten since I've
18 worked there. It wasn't all the time because I had to
19 type so fast that I really couldn't like look at every
20 single case. If I wanted to keep my job I had to do it
21 quickly.

22 Q So what you're saying on those cases is if
23 somebody would have looked they would have noticed that
24 the address is definitely different than what's on the
25 front to where they're going to be served? Is that what

1 you're saying?

2 **A** Yes, and on their marital status. I just
3 would see a little inconsistency within the mortgage
4 contract and the civil action summons.

5 **Q** Who would have been in charge of reviewing the
6 work?

7 **A** That would have been the David Stern office
8 from my understanding.

9 **Q** Who would have been in charge of reviewing
10 your work at G&Z?

11 **A** The supervisor which is Eddie Torres. He
12 would review how we were doing the serving papers. The
13 person who would review the actual inputting information
14 would be Michelle. I don't remember her last name.

15 **MR. BRIESMEISTER:** That's it.

16 **MS. CLARKSON:** We're done. If we print this
17 up you have the right to read it or you can take
18 for granted that she wrote down what you said
19 accurately and you can waive that right. Would you
20 like to read it?

21 **THE WITNESS:** I'll read it.

22 (Thereupon, the deposition was concluded at
23 2:29 p.m.)

24

25

1 STATE OF FLORIDA)

2 COUNTY OF BROWARD)

3

4 I, the undersigned authority, certify that MARY R.
5 CORDOVA appeared before me and was duly sworn.

6

7 WITNESS my hand and official seal this 23rd day of
8 September, 2010.

9

10

11

Kalandra Smith

12

Notary Public - State of Florida

My Commission No.: EE3599

13

My Commission Expires: 06/23/14

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The State of Florida,)
County of Broward)

I, Kalandra Smith, Court Reporter and Notary Public in and for the State of Florida at Large, do hereby certify that aforementioned witness was by me first duly sworn to testify the whole truth; that I was authorized to and did report said deposition; and that the foregoing pages are a true and correct transcription of my reporting of said deposition.

I further certify that said deposition was taken at the time and place herein above set forth and that the taking of said deposition was commenced and completed as herein above set out.

I further certify that I am not an attorney or counsel of any of the parties, nor am I a relative or employee of any attorney or counsel of party connected with the action, nor am I financially interested in the action.

The foregoing certification of this transcript does not apply to any reproduction of the same by any means unless under the direct control and/or direction of the certifying reporter.

IN WITNESS WHEREOF, I have hereunto set my hand this 23rd day of September, 2010.

Kalandra Smith
Notary Public - State of Florida
My Commission No.: EE3599
My Commission Expires: 06/23/14

READ AND SIGN

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I have read the foregoing pages and except for the corrections or amendments I have indicated on the sheets attached for such purposes, I hereby subscribe to the accuracy of this transcript.

Signature of Deponent

Date

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IN RE:

Deposition of:

Date taken:

DO NOT WRITE ON THE TRANSCRIPT - ENTER CHANGES HERE

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Under penalty of perjury, I declare that I have read my deposition and that it is true and correct subject to any changes in form or substance entered here.

Date:

Signature of Deponent:

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