

MICHAEL HEISE

June 7, 2011

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1 checks into savings accounts at your bank, did  
2 you leave them there?

3 MR. ERICKSON: Objection.

4 Hold on.

5 THE WITNESS: Objection, but --

6 MR. ERICKSON: Well, hold on.

7 THE WITNESS: Yeah, yeah.

8 MR. ERICKSON: Don't -- don't --

9 THE WITNESS: Yeah.

10 MR. ERICKSON: You can -- for what  
11 period of time?

12 MR. KOHLHEPP: I haven't asked him  
13 anything related to specifically where the money  
14 is now.

15 MR. ERICKSON: Well, you know it's at  
16 Klein Bank. I mean -- I suppose, yeah. Just  
17 answer the question.

18 THE WITNESS: What's the question?

19 MR. ERICKSON: Well, whatever. Just  
20 answer the question.

21 MR. KOHLHEPP: Could you read back  
22 the question, please?

23 \* \* \*

24 (Whereupon, the reporter read back  
25 the requested portion of the record.)



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EXHIBIT 4

MICHAEL HEISE

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\* \* \*

THE WITNESS: Yeah.

Are they still there to this day are you asking me?

BY MR. KOHLHEPP:

Q. Yes.

A. No.

Q. How long did you leave them in those savings accounts?

A. I have no clue, a long time. It wasn't like it was moved the next day and shuffled around. It sat there for a long time. I would say months.

Q. Two months, four months?

A. Can I call my bank and ask them?

Q. We just need your best recollection.

A. I'll say nine months (witness indicating), but the money never moved or got done with anything for a long period of time and then I -- it's -- yeah, a long time [sic]. Sat there for nine months.

Q. And then what did you do with it?

A. Spent it.

Q. All of it?

MR. ERICKSON: You can generally



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