

# Exhibit 10

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IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

- - -

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	
	)	
vs.	)No.	
	)	1:17-cv-00006-BR
ROBERT BRACE, ROBERT BRACE	)	90-cv-229
FARMS, INC., et al.,	)	
	)	
Defendants.	)	

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Deposition of ROBERT BRACE  
Wednesday, January 31, 2018

- - -

The deposition of ROBERT BRACE, one of the defendants herein, called as a witness by the plaintiff, pursuant to notice and the Federal Rules of Civil Procedure pertaining to the taking of depositions, taken before me, the undersigned, Tristan Hannaford, Notary Public in and for the Commonwealth of Pennsylvania, at the offices of U.S. Attorney's Office, 17 South Park Row, Erie, Pennsylvania 16501, commencing at 9:16 a.m., the day and date above set forth.

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1 APPEARANCES :

2 On behalf of the Plaintiff:

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18 ALSO PRESENT:

19 Beverly Brace

20 Rhonda McAtee

21 Vincent Leo

22 - - -

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1 A Yes, I do.

2 Q If you don't understand a question I ask,  
3 please ask me to clarify. I'll be happy to do so. If  
4 you don't ask me to clarify, I'm going to assume you  
5 understood my question.

6 Do you understand?

7 A Yes, I do.

8 Q If you need a break, let me know. We'll be  
9 happy to take one. I may ask you to answer the  
10 pending question before we take a break.

11 Do you understand?

12 A Yes, I do.

13 Q Are you taking any medication or have any  
14 illnesses that would affect your ability to testify  
15 truthfully today?

16 A I don't believe so.

17 Q So I want to talk for a few minutes about  
18 what you did to prepare for the 30(b)(6) today. Did  
19 you spend -- what did you do to prepare on the topics  
20 identified in the RH1 through 3?

21 A Well, we spent several hours. We met with  
22 the attorneys last Thursday. It was six or seven of  
23 us in the office. We put 25 or 30 man-hours in there.

24 All told, I would say it was probably  
25 between 70 or 80 hours, or maybe even more hours, to

1       come up with what we have and try to get everything to  
2       comply.

3                If I would have known this early on, maybe  
4       we could have avoided this second attempt here. I'm  
5       hoping, as I said in my first deposition, I was trying  
6       to answer everything the best I could.

7                I was unaware I had to have all these  
8       documentations. I did everything in my power now, and  
9       have continued to, to have everything that you need.

10       Q       Who attended the meetings?

11       A       Well, there was myself, my wife, Rhonda,  
12       Neal, Alex, Rosalie, I think Ronnie, and I'm not sure,  
13       maybe even Randy was there.

14               That was last Thursday, and then several  
15       different discussions with their accountant, as well  
16       as with Alex. So I didn't keep track of them,  
17       specifically. But I know it's a lot of hours.

18       Q       When you say accountant, you mean  
19       Mr. Roberts?

20       A       Yes.

21       Q       Anyone else, aside from the members of your  
22       family and Mr. Roberts, that you -- and Ms. Rosalie,  
23       anyone else that you consulted?

24       A       No, just the people I named. This is the  
25       people that -- we tried to bring everything together.