

TC

Case # Michele Liberis 09014536 (09)

III. INTERROGATORIES

1. Please identify any and all persons who are believed or known by you, your agents, or your attorneys, to have any knowledge concerning any of the acts and events described in the Complaint, and, for each such person, specify the substance of the knowledge you believe or know such person to have.

ANSWER:

All former employees, as well as current employees of GBFS A.K.A "Cash4Gold."

Each employee, current or former has knowledge, awareness and experience in all acts and events that were described in my posted blog/complaint.

FILED FOR RECORDS  
CLERK OF CIRCUIT COURT  
BROWARD COUNTY, FLORIDA  
09 APR -2 AM 11:30  
CIRCUIT CIVIL-3

2. Please identify any and all persons who are believed or known by you, your agents, or your attorneys to possess any documents that relate to any of the acts and events described in the Complaint, and, for each such person, specify the type(s) of documents you believe or know him or her or it to possess.

ANSWER:

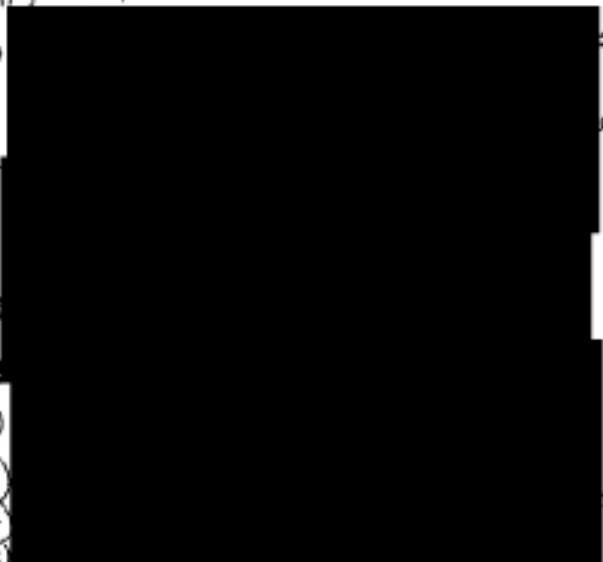
I am in touch with former employees who have in their possession the following documents:  
① "bonus" sheets and payments  
② "Insurance Claims"

3. Please identify each and every person, including, but not limited to, any other person offering services similar to GBFS, governmental agency or entity, consumer protection group or similar person, family member, friend, newspaper, periodical, web site (including blog postings), television station, radio station or other medium, with which you have had communications with relating to GBFS or any of the acts and events described in the Complaint, and for each such person so identified, describe the subject matter of such communications with such person. For each person that is not an individual person, please specify the individual person(s) affiliated with the person, with which you have had communications.

ANSWER:

I have had communication with the following associates pertaining to the same and exact info that was listed on my blog/complaint

- ① ABC-- news network
- ② ~~ABC~~ Inside Edition
- ③ An anonymous employee of Cash4Gold who contacted me.
- ④ Complaintsboard.com
- ⑤ Rip-Off Report.com



4. Please specify the date(s), location(s) each communication identified in your response to Interrogatory 3 above.

ANSWER:

Between June 08' to present.  
Cannot recall specific dates.

5. Please describe any grievance or disagreement you have had or may have with GBFS arising out of or related to your past employment with GBFS and whether such grievance or disagreement was ever discussed with GBFS or any of its employees.

ANSWER:

The major disagreement I have with GBFS/cash4Gold is it's entire business practice and the affect it has on it's many customers/their families ; as well as it's employees.

6. Please describe any evidence you may allegedly have that would cause you to believe that your statements and actions as described in the Complaint are true and describe any investigations and/or due diligence you undertook to gather such evidence.

ANSWER:

I did no sort of investigation or gathered any type of evidence.

The time that I was employed with this company provides greater insight then any investigation could ever gather. My pay stubs containing my "bonuses," <sup>and</sup> countless witnesses who are willing to testify on my behalf as well as former customers, general attorney complaints, the company's BBB rating, documents from former employees who were either let go or quit prior to handing any type of documents in their possession back to the company (which the company never asked for.)

7. Identify all communications between you and Vielka Nephew regarding Cash4Gold from October 6, 2008 to date.

ANSWER:

- ① C4G's - bonus system
- ② Stories of former customers who we <sup>spoke</sup> and with while employed by C4G, who's stories ~~was~~ experience with the company inspired us even more to speak out.
- ③ the "insurance claim" system
- ④ The inappropriate language and conversations held by our superiors and managers in our presence which made us uncomfortable.
- ⑤ Questions on why we were shut-down and banned from returning ~~to~~ to the original building.

8. Do you contend any person other than you is, or may be, liable in whole or part for the claims asserted against you in this lawsuit? If so, identify such person(s), the legal basis for your contention, the facts or evidence upon which your contention is based, and whether or not you have notified each person(s) of your contention.

ANSWER:

NO, I ~~do~~ do not find anyone nor myself liable for any part of the "claims" asserted against me. Truth is truth.

9. Have you ever been convicted of a crime, other than any juvenile adjudication, which under the law you were convicted, was punishable by death or

imprisonment in excess of 1 year, or that involved dishonesty or a false statement regardless of the punishment. If so, state as to each conviction, the specific crime and the date and place of conviction.

**ANSWER:**

I have never been convicted of a crime.

10. Please identify all proceedings, lawsuits, arbitrations or other administrative proceedings, whether civil or criminal, in which you have participated as a party at any time between January 1, 2000 and the date of your responses to these Interrogatories, and state whether you were the plaintiff or defendant, the nature of the proceeding, lawsuit, arbitration or other administrative proceeding, and the date and court in which such suit was filed.

**ANSWER:**

I have never participated in any proceedings, lawsuits, arbitrations or administrative proceedings.

11. Please describe your motivation in making the statements and taking the actions as described in the Complaint.

ANSWER:

I would love more than anything to see C4G, change and better it's business practices. The economy has affected the majority of people for the worst, I know this first hand. I could not just stand silent and watch this company prey on innocent families/people, and not do anything about it. This company is ripping people off, and it's commercials are deceiving. I have witnessed 2 cents checks being mailed out, humiliating. I've witnessed ~~parents~~ <sup>Minors</sup> calling in, and transactions being completed knowing they are minors. This company has no sense of honesty, and something must be done to change this.

12. Please state whether you have been offered, have received, or have offered, whether directly or indirectly, any payments or other consideration, in any manner related to your statements and actions as described in the Complaint, and, if so, list any persons that were involved with, or that you associated with, in connection with the offer or receipt of such payment or consideration and a description of the payment or consideration.

ANSWER:

The owners of this company, particularly Jeff and Howard were at one point harrasing my sister to speak with me, and wanting to converse with me about the possibility of removing my complaint. I refused to speak with anyone. I have never spoke with anyone about any form of payment. That is not my intentions ~~and~~ whatsoever.

13. Please identify the serial number, types, and locations of computers, hard drives, file-saving or storage devices purchased, provided, maintained, obtained, furnished, or in any way used by you at any time from the date of the commencement of your employment with GBFS through the date of your responses to these Interrogatories (if you cannot specifically identify some or all of the foregoing, generally identify any information, things and/or documents that would, or may tend to, indicate the foregoing), and the time period during which each of the above were used by you.

ANSWER:

I occasionally use my fiance and parents computer. I also sometimes use the library's computers at my school.

