

EXHIBIT F

R. Leonard, C.S.R., Inc.
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818.995.2449

SHEET 1 PAGE 1

1 IN THE STATE COURT OF DEKALB COUNTY
2 STATE OF GEORGIA
3
4
5 PATRICK C. DESMOND AND MARY C.)
6 DESMOND, INDIVIDUALLY, AND)
7 MARY C. DESMOND, AS) CIVIL ACTION
8 ADMINISTRATRIX OF THE ESTATE) NO. 10A28641-2
9 OF PATRICK W. DESMOND,)
10 PLAINTIFFS,)
11 VS.)
12 NARCONON OF GEORGIA, INC.,)
13 DELGADO DEVELOPMENT, INC.,)
14 SOVEREIGN PLACE LLC, SOVEREIGN)
15 PLACE APARTMENT MANAGEMENT, INC.,)
16 LISA CAROLINA ROBBINS, M.D.,)
17 THE ROBBINS GROUP, INC., AND)
18 NARCONON INTERNATIONAL,)
19 DEFENDANTS.)

20
21
22 DEPOSITION OF YARKO MANZANARES
23 TUESDAY, JULY 10, 2012

24 REPORTED BY: R. LEONARD, C.S.R., INC.
25 ROBIN LEONARD CERTIFIED SHORTHAND REPORTERS
CSR NO. 3334 4142 MEADOW RIDGE PLACE
ENCINO, CALIFORNIA 91436
(818) 995-2449
FILE NO.: 37158-1

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1 APPEARANCES CONTINUED
2
3
4 FOR DEFENDANT NARCONON INTERNATIONAL:
5
6 CARLOCK, COPELAND & STAIR, LLP
7 BY: DAVID F. ROOT, ESQ.
8 191 PEACHTREE STREET, NE
9 SUITE 3600
10 ATLANTA, GEORGIA 30303
11
12 MOXON & KOBRIN
13 BY: HELENA K. KOBRIN, ATTORNEY AT LAW
14 3500 W. OLIVE
15 SUITE 300
16 BURBANK, CALIFORNIA 91302
17
18 FOR DEFENDANT NARCONON OF GEORGIA, INC.:
19
20 DREW, ECKLE & FARNHAM, LLP
21 BY: LISA RICHARDSON, ATTORNEY AT LAW
22 880 W. PEACHTREE STREET
23 P.O. BOX 7600
24 ATLANTA, GEORGIA 30357
25

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1 THE DEPOSITION OF YARKO MANZANARES,
2 WITNESS, TAKEN ON BEHALF OF PLAINTIFFS,
3 AT 7000 HOLLYWOOD BOULEVARD, BARCELONA ROOM,
4 HOLLYWOOD, CALIFORNIA 90028,
5 AT 10:20 A.M., TUESDAY, JULY 10, 2012,
6 BEFORE ROBIN LEONARD, CSR NO. 3334, A
7 CERTIFIED SHORTHAND REPORTER WITHIN AND FOR
8 THE COUNTY OF LOS ANGELES AND
9 STATE OF CALIFORNIA, PURSUANT TO NOTICE.
10
11
12
13
14
15 APPEARANCES OF COUNSEL:
16
17
18 FOR PLAINTIFFS:
19
20 FRANKLIN LAW LLC
21 BY: REBECCA FRANKLIN, ATTORNEY AT LAW
22 400 COLONY SQUARE
23 1201 PEACHTREE STREET
24 SUITE 900
25 ATLANTA, GEORGIA 30361

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1 INDEX CONTINUED
2
3 FOR DEFENDANT DELGADO DEVELOPMENT, INC.:
4
5 DOWNEY & CLEVELAND, LLP
6 BY: CALVIN P. YARGER, ESQ.
7 288 WASHINGTON AVENUE
8 MARIETTA, GEORGIA 30060
9 (APPEARING TELEPHONICALLY)
10
11 ALSO PRESENT: DENNIS DAVIS (VIDEOGRAPHER)
12 CLARK CARR
13
14
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SHEET 4 PAGE 13

1 Q FOR A WATER COMPANY?
 2 A YES.
 3 Q GRAPHICS DESIGNER?
 4 A YES.
 5 Q OKAY.
 6 HOW DID YOU BECOME INVOLVED WITH NARCONON
 7 INTERNATIONAL?
 8 A BECAUSE BEFORE THAT I WORKED WITH NARCONON OF
 9 LOS ANGELES AT THE REHAB CENTER.
 10 Q OKAY.
 11 WHAT DID YOU FOR NARCONON LOS ANGELES?
 12 A LET ME SEE. BECAUSE I HAD TWO OR THREE THINGS
 13 GOING ON THERE. I HAD TO DEAL DIRECTLY WITH SUPERVISION
 14 OF STUDENTS, DELIVERING OF THE PROGRAM, ETC.
 15 Q OKAY.
 16 HOW LONG HAVE YOU BEEN INVOLVED WITH ANY
 17 NARCONON PROGRAM?
 18 A SINCE 1994.
 19 Q OKAY.
 20 AND HOW DID YOU BECOME INVOLVED WITH NARCONON
 21 IN 1994?
 22 A I MET WITH A FRIEND OF MINE. SHE WAS WORKING
 23 THERE. SHE INVITED ME THERE AND THEN SHE ASKED ME TO
 24 STAY WITH THEM AND I DID.
 25 Q ALL RIGHT.

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PAGE 15

1 A UH-HUH.
 2 Q OKAY.
 3 SO IN 2008 OR 2007/2008 TIME FRAME YOU WERE THE
 4 OPERATIONS SUPERVISOR FOR NARCONON INTERNATIONAL?
 5 A YES.
 6 Q AND EXPLAIN TO ME WHAT YOUR JOB DUTIES WERE AS
 7 THAT, IN THAT POSITION.
 8 A IT'S ENSURING THAT THE PROGRAM IS DELIVERED AS
 9 IS GIVEN THROUGH OUR LICENSE TO THE DIFFERENT CENTERS.
 10 Q OKAY.
 11 DO YOU HAVE A CERTAIN NUMBER OF CENTERS THAT
 12 YOU ARE IN CHARGE OF OR DO YOU OVERSEE THAT ALL THE
 13 NARCONON PROGRAMS -- DO YOU ENSURE THAT ALL THE NARCONON
 14 PROGRAMS ARE DELIVERED CORRECTLY? DOES THAT MAKE SENSE?
 15 A NO.
 16 Q LET ME REPHRASE THAT QUESTION.
 17 A ALL RIGHT.
 18 Q DO YOU HAVE CERTAIN NARCONON CENTERS THAT YOU
 19 WERE IN CHARGE OF IN 2007/2008?
 20 A CERTAIN? NO. IT'S NOT LIKE SPECIFIC.
 21 Q OKAY.
 22 A YEAH.
 23 Q SO OKAY.
 24 LET ME ASK YOU A LITTLE BIT ABOUT THE DAILY
 25 OPERATIONS BETWEEN NARCONON INTERNATIONAL AND NARCONON,

15

PAGE 14

1 DO YOU HAVE ANY TRAINING IN DRUG OR ALCOHOL
 2 REHABILITATION?
 3 A YES.
 4 Q TELL ME ABOUT THAT.
 5 A THAT'S THE CHEMICAL DEPENDENCY COUNSELOR.
 6 THAT'S THE ONE I HAVE.
 7 Q ALL RIGHT.
 8 A AND THE NARCONON TRAINING.
 9 Q OKAY.
 10 SO NARCONON ITSELF HAS SOME TRAINING FOR FOLKS
 11 WHO DELIVER THE PROGRAM, RIGHT?
 12 A RIGHT.
 13 Q YOU'VE DONE THAT AND YOU'VE GOT YOUR CHEMICAL
 14 DEPENDENCY COUNSELOR CERTIFICATION SEPARATE AND APART
 15 FROM THE NARCONON PROGRAM?
 16 A YEAH.
 17 Q OKAY.
 18 WHEN DID YOU GET THAT?
 19 A THAT WAS IN 2002.
 20 Q DO YOU HAVE TO BE RECERTIFIED TO KEEP THAT
 21 LICENSE CURRENT?
 22 A JUST UPDATING EVERY YEAR.
 23 Q AND DO YOU DO THAT?
 24 A YEAH.
 25 Q YOU'RE CURRENT WITH THAT LICENSE NOW?

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PAGE 16

1 LET'S SAY, OF GEORGIA OR ANY SPECIFIC NARCONON CENTER.
 2 OKAY?
 3 WHAT ARE THE REPORTING REQUIREMENTS FOR -- WHAT
 4 WERE THE REPORTING REQUIREMENTS FOR NARCONON OF GEORGIA
 5 AS IT RELATES TO NARCONON INTERNATIONAL IN 2008?
 6 A REQUIREMENTS? I DON'T GET IT.
 7 Q OKAY.
 8 WERE, WAS NARCONON OF GEORGIA REQUIRED TO
 9 REPORT ANYTHING TO NARCONON INTERNATIONAL AT ANY TIME IN
 10 2008?
 11 A OH. NO.
 12 Q THEY WEREN'T REQUIRED TO REPORT ANYTHING?
 13 A NO.
 14 Q OKAY.
 15 THEY DIDN'T HAVE TO SEND IN ANY WEEKLY REPORTS?
 16 A THEY SEND THEM BUT IT'S NOT REQUIRED FROM THEM.
 17 Q OKAY.
 18 WHY WOULD NARCONON OF GEORGIA OR ANY NARCONON
 19 CENTER SEND IN A WEEKLY REPORT IF THEY WEREN'T REQUIRED
 20 TO DO SO?
 21 A IT'S LIKE INFORMATION POINT. THAT'S HOW IT
 22 ARRIVES.
 23 Q OKAY.
 24 DO YOU UNDERSTAND MY QUESTION?
 25 A WELL, IF YOU CAN SAY IT DIFFERENTLY.

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SHEET 13 PAGE 49

1 IT WAS NOT CURRENT OR SOMETHING.
 2 Q DO YOU REMEMBER ONE WAY OR THE OTHER?
 3 A '08, RIGHT?
 4 Q UH-HUH.
 5 A EXACT EXACTLY, I DON'T REMEMBER.
 6 Q OKAY.
 7 DO YOU REMEMBER THERE BEING EVER ANY ISSUES
 8 WITH GEORGIA OWING LICENSING FEES OR NOT PAYING THEIR
 9 LICENSING FEES ON TIME?
 10 A YEAR. THERE WAS SOME TIME THEY WERE BEHIND.
 11 Q OKAY.
 12 YOU JUST DON'T REMEMBER WHEN THAT WAS?
 13 A EXACTLY.
 14 Q WAS THAT SOMETHING THAT WAS PART OF YOUR JOB,
 15 WAS TO MAKE SURE THAT THE LICENSING FEES WERE PAID ON
 16 TIME?
 17 A NO.
 18 Q OKAY.
 19 HOW WOULD YOU BE MADE AWARE OF THAT ISSUE?
 20 A EXACTLY I DON'T REMEMBER.
 21 Q WERE YOU AWARE THAT THERE WAS A BOARD OF
 22 INVESTIGATION THAT WAS OPENED IN MARCH OF 2008 REGARDING
 23 HOUSING AT NARCONON OF GEORGIA?
 24 A NO.
 25 Q OKAY.

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1 (RECESS HELD).
 2 THE VIDEOGRAPHER: WE ARE BACK ON THE RECORD AT
 3 APPROXIMATELY 11:36 A.M.
 4 Q BY MS. FRANKLIN: MR. MANZANARES, SWITCH GEARS
 5 FROM WHAT WE WERE DISCUSSING BEFORE THE BREAK.
 6 TELL ME HOW YOU LEARNED -- WELL, LET ME BACK
 7 UP. YOU REALIZE WE'RE HERE, THIS LAWSUIT INVOLVES THE
 8 DEATH OF A STUDENT AT THE NARCONON OF GEORGIA CENTER,
 9 CORRECT?
 10 A (WITNESS NODS HEAD IN THE AFFIRMATIVE).
 11 Q YOU JUST HAVE TO VERBALLY ANSWER FOR THE COURT
 12 REPORTER.
 13 A OH. YES.
 14 Q AND THAT STUDENT'S NAME WAS PATRICK DESMOND.
 15 YOU UNDERSTAND THAT, CORRECT?
 16 A YES.
 17 Q OKAY.
 18 HOW DID YOU PERSONALLY BECOME AWARE OF
 19 MR. DESMOND'S DEATH?
 20 A IT WAS VERBALLY. I LEARN THAT FROM THE
 21 DIRECTOR OF LEGAL AFFAIRS.
 22 Q AND THAT'S CLAUDIA?
 23 A CLAUDIA, YEAH.
 24 Q OKAY.
 25 WHAT DID CLAUDIA TELL YOU?

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PAGE 50

1 ARE YOU AWARE OF THAT NOW? I MEAN, YOU
 2 REVIEWED SOME DOCUMENTS FOR YOUR DEPOSITION.
 3 A YEAH. THIS IS THE ONLY ONE THAT GAVE ME THAT
 4 BUT I DON'T KNOW IF IT HAPPENED OR NOT.
 5 Q OKAY.
 6 AND YOU'RE AWARE OF THAT BECAUSE OF
 7 DISCUSSIONS, LIKE IN THE FIRST, ON THE FIRST PAGE A
 8 LITTLE MORE THAN HALFWAY DOWN WHERE MARY RIESER SAYS TO
 9 CLAUDIA AND ISAAC, "MY REASONING BEHIND THE B OF I WAS
 10 TO GET A THIRD PARTY OBSERVATION AND DOCUMENTATION OF
 11 THE SITUATION."
 12 RIGHT?
 13 A RIGHT.
 14 Q BUT YOU DON'T REMEMBER ANYTHING INDEPENDENT
 15 ABOUT A BOARD OF INVESTIGATION REGARDING HOUSING?
 16 A NO.
 17 Q ALL RIGHT.
 18 SWITCH GEARS HERE UNLESS YOU NEED TO TAKE A
 19 BREAK.
 20 A OKAY.
 21 MS. RICHARDSON: I'D LIKE TO TAKE A SHORT TIME
 22 BREAK IF THIS IS A GOOD TIME.
 23 MS. FRANKLIN: OKAY.
 24 THE VIDEOGRAPHER: WE'RE GOING TO GO OFF THE RECORD
 25 AT 11:22 A.M.

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PAGE 52

1 A THAT A STUDENT OD'D.
 2 Q AND WHEN DID SHE TELL YOU THAT?
 3 A WHEN?
 4 Q UH-HUH.
 5 A EXACTLY I DON'T KNOW. PROBABLY AROUND THAT
 6 DATE.
 7 Q OKAY.
 8 AND THAT'S ALL SHE TOLD YOU ABOUT THE
 9 CIRCUMSTANCES?
 10 A YEAH.
 11 Q ALL RIGHT.
 12 AND DID YOU -- DID SHE ASK YOU TO DO ANYTHING
 13 IN RESPONSE?
 14 A SHE SUGGESTED, YEAH, AN INSPECTION TO BE SENT
 15 THERE.
 16 Q OKAY.
 17 AND AS OPERATIONS SUPERVISOR, IS THAT SOMETHING
 18 THAT YOU WOULD BE IN CHARGE OF DOING IS SETTING UP AN
 19 INSPECTION?
 20 A YES.
 21 Q OKAY.
 22 AND YOU DID THAT IN THIS CASE, CORRECT?
 23 A UH-HUH.
 24 Q OKAY.
 25 DID YOU PERSONALLY COME INSPECT THE FACILITY?

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SHEET 14 PAGE 53

1 A NO.
 2 Q OKAY.
 3 WHO DID THAT?
 4 A I ASKED TO HAVE THIS LADY, SHE USED TO
 5 WORK -- SHE USED TO WORK AT NARCONON ARROWHEAD, JETTE.
 6 Q JETTE MAC GREGOR?
 7 A YES.
 8 Q AND YOU ASKED HER TO GO TO GEORGIA TO DO A TECH
 9 INSPECTION, CORRECT?
 10 A TO NARCONON; YES.
 11 Q OKAY.
 12 AND WHY DID YOU DO THAT?
 13 A TO SEE HOW THE PROGRAM WAS BEING DELIVERED.
 14 YEAH.
 15 Q AND ANY OTHER REASON?
 16 A NO.
 17 Q WHAT IS A TECH INSPECTION?
 18 A IT'S AN INSPECTION OF THE DELIVERY OF THE
 19 NARCONON PROGRAM.
 20 Q OKAY.
 21 WHAT DOES IT INVOLVE?
 22 A THAT INVOLVES THE EIGHT BOOKS THAT THE NARCONON
 23 PROGRAM CONSISTS OF.
 24 Q WHAT ELSE?
 25 A JUST THAT.

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PAGE 55

1 SO YOU WERE TOO BUSY TO GO SO YOU ASKED SOMEONE
 2 FROM NARCONON ARROWHEAD TO GO PERFORM A TECH INSPECTION?
 3 A YEAH.
 4 Q ALL RIGHT.
 5 AND I'M JUST GOING TO BACK UP AND ASK A LITTLE
 6 BIT ABOUT -- EXCUSE ME -- INSPECTIONS IN GENERAL. AND
 7 IF A PERSON WHO IS CONDUCTING A TECH INSPECTION FIND
 8 SOMETHING WRONG, WHAT HAPPENS?
 9 A THIS PERSON ISSUES A CORRECTION --
 10 Q UH-HUH.
 11 A -- TO THE PERSON THAT'S DELIVERING THAT PART OF
 12 THE PROGRAM.
 13 Q A MEMO?
 14 A YES.
 15 Q SOME WRITTEN FORM?
 16 A EXACTLY.
 17 Q BECAUSE THE TECHNOLOGY HAS TO BE DELIVERED
 18 EXACTLY AS PRESCRIBED OR SET OUT IN THE NARCONON PROGRAM
 19 BOOKS, CORRECT?
 20 A WHAT'S IN THE BOOKS, YEAH.
 21 Q OKAY.
 22 AND HOW OFTEN ARE TECH INSPECTIONS TO BE
 23 PERFORMED FOR ANY GIVEN NARCONON CENTER?
 24 A ONCE A YEAR.
 25 Q OKAY.

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PAGE 54

1 Q OKAY.
 2 SO THAT'S AN INSPECTION OF THE EIGHT BOOKS?
 3 A YEAH. THE DELIVERY OF THE EIGHT BOOKS.
 4 Q OKAY.
 5 AND WHAT IS THE PERSON WHO IS PERFORMING THE
 6 INSPECTION, WHAT DO THEY INSPECT?
 7 A THEY INSPECT THE AREAS, LIKE FOR INSTANCE THE
 8 BOOKS ARE DELIVERED IN WHAT'S CALLED COURSE ROOM.
 9 Q RIGHT.
 10 A SO THEY INSPECT THE COURSE ROOM, THEY LOOK AT
 11 DETAILS TO SEE IF THE PEOPLE ARE DOING THE BOOKS LIKE
 12 COMPLETELY, NOT SKIPPING CHAPTERS OR WHATEVER.
 13 Q OKAY.
 14 AND WHAT HAPPENS IF STUDENTS AREN'T DOING THE
 15 EXERCISES OR THE BOOKS EXACTLY AS PRESCRIBED?
 16 A LIKE WHAT? I DON'T GET IT.
 17 Q OKAY.
 18 IF THERE'S A TECH INSPECTION -- WELL, FIRST OF
 19 ALL, DO YOU EVER DO TECH INSPECTIONS YOURSELF?
 20 A YEAH.
 21 Q AND WHY DID YOU ASK JETTE MAC GREGOR TO DO ONE
 22 IN THIS CASE?
 23 A I DON'T REMEMBER EXACTLY. I WAS NOT GOING TO
 24 GO. I WAS PROBABLY BUSY.
 25 Q OKAY.

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PAGE 56

1 SO THEY HAVE ANNUAL INSPECTIONS?
 2 A YEAH.
 3 Q ALL RIGHT.
 4 AND THAT'S A REQUIREMENT FROM NARCONON
 5 INTERNATIONAL, CORRECT?
 6 A WHAT? I DON'T GET IT.
 7 Q OKAY.
 8 DOES NARCONON INTERNATIONAL REQUIRE A TECH
 9 INSPECTION FOR EACH OF ITS CENTERS ANNUALLY?
 10 A NOT NECESSARILY.
 11 Q OKAY.
 12 WELL, HOW DO YOU DECIDE WHEN TO DO ONE?
 13 A BECAUSE THEY ARE DONE LIKE RANDOMLY.
 14 Q OKAY.
 15 SO NARCONON INTERNATIONAL CAN RANDOMLY COME
 16 INTO A NARCONON CENTER AND DO AN INSPECTION?
 17 A YEAH.
 18 Q OKAY.
 19 AND THE NARCONON CENTERS ACTUALLY HAVE TO PAY
 20 FOR THE HOUSING AND THE TRAVEL ARRANGEMENTS FOR THE
 21 NARCONON INTERNATIONAL INSPECTORS, CORRECT?
 22 A NO.
 23 Q THEY DON'T?
 24 A NO.
 25 Q WHO PAYS FOR IT?

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