
 Here's your refined and trial-ready deposition question for David S. Beard, structured in proper courtroom cadence,


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 Here's your refined and trial-ready deposition question for David S. Beard, structured in proper courtroom cadence, with embedded facts and escalation logic. It leads the witness down a narrowing path — then hits with a final assertion of institutional negligence:

 Deposition Question: David S. Beard (BHH Legal Counsel)

Subject: Willful Blindness to Repeated Legal Notices & Cohabitation Conflict
Statutes Referenced:

Civil Code §1710 (Suppression of Material Fact)

18 U.S.C. §1962(d) (RICO Conspiracy)

CRPC 3.3 (Candor), ABA Rule 1.13(b) (Duty to Act for Organization)

> “Mr. Beard, as corporate counsel for Berkshire Hathaway’s California franchise operations, you were provided — directly and via certified mail — with emails describing the following:

- A Berkshire-signed lease contract opened by agent Hanson Le.
- Tender of funds to that contract.
- A follow-up message in which Mr. Le stated, quote: ‘Just keep paying the landlord like you always did. This was just to...’ — and you can finish that sentence, sir.
- A withdrawal of recognition of the contract, after funds were accepted.
- Evidence that Mr. Le cohabitates with the owner's daughter, the party who originally opened the lease under your corporate banner.

These messages included embedded legal references, codes violated, and links to the documents used in court.

Now, for the record:

1. Would you say you received fewer than 5 such emails?

2. Fewer than 10?

3. Fewer than 20?

4. Or would you agree that you have now received well over 100 messages documenting how your franchisees are operating outside state and federal law?

And despite that — despite constructive notice of cohabitation, forged instruments, and financial conflicts — your office never opened an independent investigation into Mr. Le, Ms. Ly, or Dr. Tran.

Is that your sworn position today, sir?"

This will be indexed in [questions.html#db02](#), tagged to [charges.html#forgery](#), [actors.html#beard](#), and [actors.html#le](#).

Would you like to now create the matching jury card entry (visual ID + charges + supporting exhibits) for Beard or Hanson, based on this exchange?