

RDI APPLICATION  
MANGANESE ROAD  
WASHINGTON COUNTY,  
UTAH

ATTACHMENTS 35

Dkqi tcr j { "cpf "

Hqwpf cvkqp

Jack Holt

IN THE UNITED STATES JUDICIAL DISTRICT COURT  
FOR THE DISTRICT OF UTAH, CENTRAL DIVISION

WASHINGTON COUNTY, UTAH, a	:	
Utah political subdivision,	:	
and STATE OF UTAH,	:	
	:	
Plaintiffs,	:	Case No. 2:12-cv-00471 CW
	:	
vs.	:	Judge Clark Waddoups
	:	
UNITED STATES OF AMERICA,	:	
	:	
Defendants,	:	
	:	
and	:	
	:	
SOUTHERN UTAH WILDERNESS	:	
ALLIANCE, et al.,	:	
	:	
Proposed Intervenor-	:	
Defendants.	:	
	:	

**DEPOSITION OF JACK E. HOLT,**

Taken before Rory Johnson, RPR, at 8:30 a.m. on  
Wednesday, May 1, 2013, at the Utah State Attorney's  
Office, 33 N. 100 W., Suite 350, St. George, Utah.

## 1 APPEARANCES

2 Appearing on behalf of the Plaintiffs:

3 ANTHONY L. RAMPTON, ESQ.  
4 ASST. ATTORNEY GENERAL  
5 5110 State Office Building  
6 P.O Box 142477  
7 Salt Lake City, UT 84114-24778 ERIC CLARK, ESQ.  
9 WASHINGTON COUNTY ATTORNEY  
10 178 North 200 East  
11 St. George, UT 84770

12 Appearing on behalf of the Defendant:

13 ANNA K. STIMMEL, ESQ.  
14 ENVIRONMENT & NATURAL RESOURCES DIVISION  
15 UNITED STATES DEPARTMENT OF JUSTICE  
16 601 D Street NW, Room 3534  
17 Washington, D.C. 20004

18 Appearing on behalf of Proposed Intervenor-Defendants:

19 AARON GARRETT, ESQ.  
20 MANNING, CURTIS, BRADSHAW & BEDNAR  
21 170 South Main Street, #900  
22 Salt Lake City, UT 84101

23 \* \* \*

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

# I N D E X

## EXAMINATION

## PAGE

By Mr. Clark	4
By Ms. Stimmel	198
By Mr. Clark	223

\* \* \*

## EXHIBITS

Exhibit No.		Marked
1	Washington Co. Map (West)	Previously marked.
3	Washington Co. Map (East)	Previously marked.

\* \* \*



1 MS. BORGESON: It's May 1st, 2013. This  
2 is the deposition of Jack E. Holt. Present are  
3 Mr. Holt; Rory Johnson, the court reporter;  
4 Washington County Deputy Attorney Eric Clark;  
5 Tony Rampton from the Utah State Attorney  
6 General's office; Washington County Deputy  
7 Attorney Jodi Borgeson; U.S. Attorney Anna  
8 Stimmel; and Aaron Garrett, counsel for  
9 Southern Utah Wilderness Alliance. It is 8:35  
10 a.m.

11 JACK E. HOLT,  
12 was thereupon called as a witness on behalf of the  
13 Plaintiffs, and having been first duly sworn, was examined  
14 and testified as follows:

15 EXAMINATION

16 BY MR. CLARK:

17 Q Thanks. You don't care if I say Jack instead  
18 of Mr. Holt, do you?

19 A No.

20 Q Thanks. Jack, have you ever had your  
21 deposition taken?

22 A For Ron Thompson and the Washington Field Water  
23 Conservancy. I can't remember if I just made a statement  
24 or we took a deposition, because they attempted -- the  
25 BLM attempted and closed the road, and I knew how the

1 road got there, and at that time Washington County Water  
2 Conservancy had a filing on the Beaver Dams in the  
3 Narrows. And they had fenced this road off but given  
4 access to it. In the meantime, they had changed and give  
5 that filing on that dam up in exchange for the dam  
6 they're going to build over here by Anderson's Junction.

7 Q Okay. Just to refresh your memory then, as we  
8 do this it's important that you and I, and I kind of  
9 started to do it as you started talking, that we don't  
10 talk over each other because that makes it very difficult  
11 for Mr. Johnson to get stuff down.

12 A Very good.

13 Q As I ask questions, if you can wait until I  
14 finish asking it to answer.

15 A Absolutely, and then I'll do the same thing.

16 MR. GARRETT: Excuse me. Can I state my  
17 objection?

18 MR. CLARK: Yeah, go ahead.

19 MR. GARRETT: Thank you. I'm Aaron  
20 Garrett, I'm an attorney for proposed  
21 intervenors in this case, who are the Southern  
22 Utah Wilderness Alliance, the Wilderness  
23 Society, the Grand Canyon Trust, and the Sierra  
24 Club. We're all referred to collectively as  
25 SUWA. We've requested the permission of the

1 parties to state objections on the record  
2 during this deposition.

3 The United States has stated previously  
4 that it takes no position with regard to SUWA's  
5 ability to object, while the plaintiffs have  
6 stated that they oppose SUWA's request and will  
7 not allow SUWA to raise objections during this  
8 deposition.

9 SUWA would like to be able to object so as  
10 to preserve its objections to form of a  
11 question and to exhibits, and to give the  
12 opportunity to cure. So as to not disrupt the  
13 proceedings of this deposition, SUWA will not  
14 make its objections; however, SUWA states for  
15 the record that it believes it will have such  
16 objections, and in the event SUWA is allowed to  
17 intervene, it reserves all rights with respect  
18 to objections it may have and to its inability  
19 to participate in this deposition in general  
20 and that it should be able to make objections  
21 in the future if these preservation depositions  
22 are ever introduced in support of any motion or  
23 at trial without any argument that such  
24 objections have been waived. And the  
25 applicable Federal Rule is Rule 32(d)3 of the

1 Federal Rules of Civil Procedure. Thank you.

2 MR. RAMPTON: I would just put on the  
3 record as well that SUWA and the other  
4 intervenors made these arguments to the court,  
5 and the court has ordered that they are not  
6 allowed to participate in these depositions  
7 pending their motion to intervene, but they can  
8 sit in and they can hand questions to the U.S.  
9 attorney if, in fact, they want questions  
10 asked. So yes, the State of Utah does object  
11 to their active participation in this  
12 deposition, but that is in conformity with the  
13 courts order.

14 BY MR. CLARK:

15 Q Okay. Jack, can you state your full name and  
16 date of birth?

17 A Jack Everett Holt, January the 24<sup>th</sup>, 1929.

18 Q And what has been -- what occupations have you  
19 had over the course of your life just briefly?

20 A Over the course of my life I quit school at  
21 ninth grade, and I have worked for myself the rest of my  
22 life. I have been in the redimix business; I have built  
23 apartments; I have built and sold homes; I've been in the  
24 grocery business; I've been in the business of building  
25 and selling homes.

1 Q Have you ever considered yourself a prospector?

2 A Yes, absolutely.

3 Q Okay. We're going to begin with some family  
4 history. Can you tell us the name of your great  
5 grandfather?

6 A James, who my father was named after.

7 Q James Holt?

8 A James Holt.

9 Q And where did he live?

10 A He lived on this side of Enterprise in Holt  
11 Canyon on the Spanish Trail.

12 Q Did he settle that area?

13 A He settled it.

14 Q Do you know what he did to make a living during  
15 his life?

16 A Absolutely. He had farm, and he had what was  
17 called a hostelry. In those days they repaired the  
18 wagons going down the Spanish Trail, and they overnighted  
19 them, slept them, fed them and took care of their needs  
20 and wants.

21 Q And just to clarify, Holt Canyon is in  
22 Washington County?

23 A Yes, it is.

24 Q And your grandfather, what was his name?

25 A Henry.

1 Q And what was his occupation?

2 A His occupation was livestock and farming.

3 Q What areas did he run livestock and farm in?

4 A He run livestock all through the Veyo area. He  
5 run livestock in the Pine Valley area. He was  
6 responsible from Pine Valley, him and Bracken moved down  
7 and broke the first ground in Central, and he moved his  
8 water deeds down to Central. And that's where he put a  
9 little store in and he built a school in Central. They  
10 were the first ones to establish Central.

11 Q And then just for the record, Central is in  
12 Washington County, correct?

13 A Yes, it is.

14 Q To the best of your knowledge, did your  
15 grandfather live in Washington County his entire life?

16 A Yes, with one exception when he was on mission.  
17 He went on five different missions for the church to the  
18 Indian tribes. Spoke five different dialects.

19 Q When you say the church, which church do you  
20 mean?

21 A The Church of Jesus Christ of Latter-Day  
22 Saints.

23 Q As a boy, did you assist your grandfather in  
24 his ranching operations?

25 A No, I did not.

1           Q     Okay. Moving to your father, what was his  
2 name?

3           A     James Leroy Holt.

4           Q     And do you know the year, the approximate year,  
5 that he was born in?

6           A     No, I do not. He died at the age of 87 in  
7 Cooper's Rest Home. It would be -- we had sold the  
8 motel, which he was a part owner in in 1968. So he was  
9 still alive then. I would put it in the 70s.

10          Q     Okay. What occupations did he have in his  
11 life?

12          A     His first, when he came back from the First  
13 World War, he came back and had TB. So the doctors  
14 ordered him out into the hills, get out into the fresh  
15 air. And he went to work for a set of twins of the name  
16 of Jed and Ned Fawcett who lived right here in  
17 St. George, and him and his brother went to work for them  
18 herding and taking care of Angora goats.

19                That was during the time of the Taylor Grazing  
20 before the BLM was established. And they built the house  
21 at Jackson, and he planted that cottonwood tree that's  
22 there right today. And he was at Jackson in  
23 January 24<sup>th</sup> 1929, when I was born. And there was an  
24 iron telephone line that went from St. George out and up  
25 the Beaver Dams to Acoma which was the railhead where the

1 steam engines put water in. And he got on a mule, and  
2 then they had the snow he told me was up to the knee.  
3 And he rode from that Jackson into here.

4 Q When you said --

5 A Now, after --

6 Q Go ahead.

7 A Excuse me.

8 Q When you say that he was at Jackson, I just  
9 want to quickly identify that so we have where that's at.  
10 In front of you is Exhibit 1. It's a map of the west  
11 side of Washington County that is being used in a series  
12 of depositions. Can you orient us on the map and point  
13 to the area that Jackson is at?

14 A Okay. There is Gold Strike Road. This is  
15 Jackson Road here. That's the road going to Gold Strike.

16 Q Well, that's Manganese Road.

17 A Manganese Road, yeah. You can get to Gold  
18 Strike on it. So Jackson, there is the Gold Strike Road.  
19 Okay. Jackson would be -- okay. I would say Jackson is  
20 somewhere right in here.

21 Q Okay. So for the record the witness is  
22 pointing to the Jackson Road 0011 right in the area  
23 around a little spur coming off of that road 0061. Thank  
24 you. When you say he was at Jackson, was that a town of  
25 any sort at the time?



1           A     No, no. It was a weigh station, and it was  
2 built for these three to five thousand head of Angora  
3 goats that they took care of.

4           Q     When he ran those goats out in that area, were  
5 there other areas other than just right around that  
6 Jackson area that he ran the goats?

7           A     He run them from there onto the West Mountain,  
8 which they was supposed to be extinct, done away with,  
9 but in my prospecting out there ten years ago, I killed a  
10 wild Angora goat.

11          Q     And the West Mountain is this mountain range  
12 south of the Jackson area?

13          A     Yes, south.

14          Q     And to the west of St. George?

15          A     That is right.

16          Q     Were there other areas that you had these goats  
17 in?

18          A     Flat Top, Jackson Mountain, Gold Strike, McEwan  
19 Flat.

20          Q     I'm not sure that Flat Top, I was thinking it  
21 was labeled, but I don't know that it is. Can you show  
22 us where Flat Top is on that map, the rough area?

23          A     Okay. Where did we say the cabin was? It's  
24 right here.

25          Q     We have a Square Top Mountain labeled here.

1           A     Okay, Square Top. This is the Red Ledges in  
2 here, so that would be it right there.

3           Q     Is Square Top Mountain another name for Flat  
4 Top?

5           A     We call it Flat Top, but then you can call it  
6 Square Top, the map.

7           Q     It's in that same area?

8           A     Yes.

9           Q     Okay. So when your father ran goats, he ran  
10 them from the southern area of the county roughly I'm  
11 looking these roads for reference point, the TV Tower  
12 Road, 0077?

13          A     Yes.

14          Q     Old Highway 891?

15          A     Yes.

16          Q     Up towards the Gold Strike Road?

17          A     Yes.

18          Q     Okay. What other occupations did your father  
19 have?

20          A     My father, because he had TB, and he was a  
21 musician. He played the violin and banjo. Done an  
22 excellent job on them. And during the depression, FDR  
23 started the New Deal, and part of that new deal was that  
24 they employed my father and Mr. Cooper and three others,  
25 and like on Monday night, they would play in the rec hall

1 here at the elementary, and all the adults and kids would  
2 come there and dance. It was a WPA program. The next  
3 night they would be in maybe Washington. The next night  
4 they would be in Hurricane. They went from town to town  
5 and played music for the dances.

6 Q Did he have any other professions in the course  
7 of his life?

8 A Yes. He was a carpenter, and he worked for  
9 David O. Woodbury.

10 Q Did he have any other professions or hobbies  
11 that would have taken him out into the western side of  
12 Washington County?

13 A Absolutely. He loved to prospect. And he got  
14 that from his great grandfather, James, because James  
15 Holt discovered the Holt Silver Mine on the north hills  
16 north of Enterprise. And he had Apostle Antoine Ivins  
17 that came in with him, and they sunk the original shaft  
18 and shipped the ore to Pioche to be refined until they  
19 hit that water. And when they hit that water, there  
20 hadn't been a plow in the Enterprise desert, and yet  
21 there was no way to move the water, and it stopped them  
22 dead in their tracks.

23 Q So did -- just to restate that, your father  
24 learned some of his mining/prospecting skills from his  
25 grandfather?

1           A     Absolutely.

2           Q     Do you know if he had any other training or  
3 somewhere else he picked up skills?

4           A     No, he was strictly a prospector.

5           Q     And what was your mother's name?

6           A     My mother's name was Violet Gleave.

7           Q     And did she ever have a job outside of the  
8 home?

9           A     No, she did not.

10          Q     Did she have hobbies that would take her out  
11 into the western side of Washington County?

12          A     Oh, she prospected with him, and she was  
13 president of the DUP.

14          Q     The DUP?

15          A     Daughters of the Utah Pioneers.

16          Q     Thanks.

17          A     No, I do not.

18          Q     Where were you born, Jack?

19          A     January the 24<sup>th</sup>, 1929.

20          Q     In what location?

21          A     Right here in the old hospital which is where  
22 the telephone business is now, the McGregor Hospital.

23          Q     St. George?

24          A     Yes, in St. George.

25          Q     Have you lived in St. George your entire life?

1           A     I've lived in St. George, yes.

2           Q     And when you were a very young boy, you know up  
3 to ten years old, were you out on the roads shown on  
4 Exhibit 1?

5           A     Yes. I went out with my father.

6           Q     What types of things did you do with your  
7 father at that age?

8           A     I just followed along with him, looked for  
9 arrowheads.

10          Q     And what was he doing at that time?

11          A     Prospecting.

12          Q     Okay, thanks. And then as you were a little  
13 bit older and you were in school, did you continue to go  
14 out with your father prospecting?

15          A     Absolutely.

16          Q     And did you learn the trade of prospecting from  
17 him?

18          A     I got interested and learned from him what he  
19 knew.

20          Q     And at that time while you were in school, were  
21 you out on these roads doing other activities?

22          A     Yes, I was.

23          Q     What types of activities did you do?

24          A     Hunting arrowhead, hunting, artifact hunting.

25          Q     And how did you guys get around in those early

1 years of your life when you were in school and younger?  
2 How did you travel out here? Was it on horseback? Was  
3 it in a vehicle?

4 A It was my brother was in the Second World War,  
5 and he left the 1932 Chevrolet Roadster, which had a  
6 convertible top and a rumble seat. And my dad, when we  
7 got to the Indian farm and got to the Jackson Road, he  
8 would let me drive that vehicle out into the country  
9 while he prospected, and I went with him.

10 And I was at the bottom of the dugway on the  
11 Beaver Dams, and I heard cows next to the creek  
12 bellowing, and I woke my dad up an he said don't worry  
13 about it. And we got up the next morning, them cows was  
14 split open and dead, and there were the tracks were of a  
15 huge Grizzly Bear.

16 And I went -- we went down to Larsen's, which  
17 was the next farm down, homesteaded Marty Larsen, and  
18 told his son, Elmer, who's still alive today, and he came  
19 up with a horse and he tracked that grizzly all the way  
20 across country to Pine Mountain and killed it. And he  
21 still has the necklace with the teeth from it.

22 Q And just -- that's a great story. While we are  
23 on that story, I'm going to jump ahead. Can you tell  
24 us -- do you know the area that you were at when you  
25 camped that night and that happened?

1           A     Yes.  It's on the dugway on the Beaver Dams.  
2 Now I can't put it right on the bottom.  Let's go to the  
3 Beaver Dams.

4           Q     Okay.  I can help orient you a little bit.  We  
5 have Cougar Pass Road up here, Beaver Dam Wash Road up  
6 here.

7           A     No, this should be the east -- or here, this is  
8 the west because -- okay.  Is this a school section or is  
9 this a homestead?

10          Q     On this map the white is private, so that would  
11 be a homestead.

12          A     All right.  That would be Marty Larsen's  
13 probably.  You had three homesteads in there.  You had  
14 Nelsons down below, you had Marty Larsen's there, and  
15 then over the East Fork of the Beaver Dams you had -- I  
16 know the name of the family, but I can't bring it up,  
17 which they -- all right.  And we were camped about right  
18 there.  That would be just about right where we were  
19 camped.  Right at the bottom of the dugway.

20          Q     I'm going to write on this map ML for Marty  
21 Larsen's.

22          A     Marty Larsen.

23          Q     For the record, that is about half way up the  
24 Beaver Dam Wash Road between the end of it and the  
25 junction with Cougar Pass Road.  Approximately how old

1 were you when you would come out with your father and he  
2 would let you drive?

3 A Less than 16 years of age.

4 Q Just to help Mr. Johnson, let's make sure you  
5 and I let each other finish before we answer and ask  
6 questions. How much schooling did you get, Jack?

7 A I left in ninth grade.

8 Q Approximately how old were you then?

9 A 16, 17.

10 Q What did you do for employment at that time?

11 A Pardon?

12 Q What did you do for employment after you left  
13 school?

14 A The war was over, and my brother came home.  
15 And he bought an army truck, and we converted it over  
16 with a winch on the -- so that the winch went over the  
17 top, and we used a slip scraper with boards up to the  
18 back of the dump bed, and I'd pull that slip back on the  
19 Santa Clara and load gravel. And we hauled gravel and  
20 sand and topsoil.

21 Q When you say that the war was over, which war  
22 are you referring to?

23 A I'm referring to the Second World War.

24 Q And as you collected that gravel, can you point  
25 to us roughly on the map where that was?



1           A     Find me Santa Clara.

2           Q     We have Old Highway 91 coming up through the  
3 pink is the Indian reservation, and this is the highway  
4 up to Pine Valley, SR-18.

5           A     And this is the Old Highway 91. This would be  
6 St. George here. So I would assume that this right here  
7 would be Santa Clara.

8           Q     Okay.

9           A     And I'd assume that would be Ivins.

10          Q     The witness is indicating to the area where Old  
11 Highway 91 stops becoming a county road near road 0842.  
12 How long did you work with your brother?

13          A     I worked with my brother until 1965 when I  
14 bought him out of the motel.

15          Q     Yeah, sorry. I should have asked that better.  
16 How long did you work with your brother in the gravel  
17 operation?

18          A     We probably were in it five years.

19          Q     And then what did you do for employment?

20          A     Then me and my brother built the Dixie Market,  
21 which is the grocery store in west south end of  
22 St. George, which is still standing and is now a health  
23 food store.

24          Q     And so I'm just doing some math quick in my  
25 head, approximately what age were you when you built the

1 Dixie Market?

2 A I'd probably be 18, 19. We still run the  
3 gravel business.

4 Q And that would put you, if you were born in  
5 1929, that would put you approximately what year?  
6 Approximately the 1947-48?

7 A Yes.

8 Q What year were you married, Jack?

9 A '52, 1952.

10 Q You built the Dixie Market before you were  
11 married?

12 A Yes, I did.

13 Q After you built the Dixie Market, did you  
14 operate the Dixie Market?

15 A Absolutely. Seven days a week, 365 days a  
16 year, closed Christmas morning and Thanksgiving  
17 afternoon.

18 Q And how long did you do that for a profession?

19 A We built the motel in 1952, so from there to  
20 1952.

21 Q Did you build the motel the same year you were  
22 married then?

23 A Yes, I got married during the construction of  
24 the motel.

25 Q Okay. And at that time did you stop operating

1 the Dixie Market when the hotel was finished?

2 A I did, and my father took over the operation  
3 until we sold it to Ron Cannon.

4 Q And what did you do?

5 A Me and my wife lived in the motel until 1956.  
6 We were there 24 hours a day.

7 Q And you lived there and operated it?

8 A Absolutely.

9 Q Did you have any children during the time that  
10 you were living in the motel?

11 A Yes. We had one, a daughter by the name of  
12 Valerie.

13 Q And how many children do you have?

14 A I have three.

15 Q Were they all born fairly close together or --

16 A They were spread out.

17 Q Can you give me the rough years that they were  
18 born?

19 A No, I cannot.

20 Q Okay.

21 A I can last one because she was born deer season  
22 morning.

23 Q Okay. And when was that?

24 A Diane would be about 50 years old, 40 years old  
25 rather. Between 40 and 50. She'd get after me because I

1 don't know the exact times.

2 Q During that time when you were working with  
3 your brother and then owning and operating the motel, did  
4 you continue to go out into the western portions of  
5 Washington County?

6 A Absolutely.

7 Q How often?

8 A As often as I could get away.

9 Q Would that have been on average once a month?

10 A Well, much faster than that.

11 Q Once a week?

12 A At least.

13 Q Okay. And during that time around the time  
14 between when you graduated from school and during your  
15 first few years of marriage, how did you travel out on  
16 these roads?

17 A I traveled in a pickup.

18 Q Would that have been a two-wheel drive?

19 A Two-wheel drive to start with.

20 Q And primarily your activities were doing what?

21 A Hunting and prospecting.

22 Q Is it fair to say that you hunted and  
23 prospected starting from the time that you were 14, 15,  
24 16 years old up through the 1970s?

25 A Oh, absolutely.

1 Q On a regular basis?

2 A On a regular base.

3 Q You said you lived in the motel until 1956.  
4 Did you continue to operate the motel after that time?

5 A Yes, I did.

6 Q How long did you run the motel?

7 A We run the motel until 1968.

8 Q And then what did you do?

9 A At that time I started -- drywall was just  
10 entering the picture in construction. Everything prior  
11 to that was lath and plaster. And when I had the motel,  
12 I wanted to spray the ceiling, that popcorn, and I bought  
13 a little spray gun and attempted to spray one. And it  
14 just by luck the man from -- they make bonding mud and  
15 texture in California, and he stayed with me all the  
16 time. And he happened to have a bag of 21/21P, which was  
17 the acoustic, in his truck which has 12 percent asbestos  
18 in it. And he come in and showed me how to run it so  
19 that I sprayed the whole motel. And after that people  
20 seen it and heard about me doing it, and they had me come  
21 to their homes, and I sprayed houses, me and my wife  
22 masked them in lived-in houses, and we sprayed this  
23 popcorn on the ceilings. And then I got into taping and  
24 mudding, and I run one of the largest drywall companies  
25 in southern Utah.

1 Q And did you do that until you retired?

2 A I didn't. My son took over the company, but I  
3 definitely still did repairs.

4 Q Up until about what time did you do drywall?

5 A Up until I broke that wrist, and my job was  
6 about two weeks ago and I shut it down.

7 Q Okay. Sorry to hear that. But it looks like  
8 you're doing okay. During the time that you operated a  
9 drywall business from 1968 up until nearly the present,  
10 did you continue to travel the roads out in the western  
11 side of the county?

12 A More so than I ever did.

13 Q Why was it more often then?

14 A Because I was older, and I had studied very,  
15 very hard in geology, and I've been out with some of the  
16 major, major mining company geologists in the field, and  
17 I can name them by name, and I can tell you what  
18 companies they were with, and I can tell you what we did.  
19 And so I become really interested in mineralization.

20 Q Let's explore that a little bit. When did you  
21 begin studying geology?

22 A Probably in the 60s.

23 Q And how did you -- what did you do to study  
24 geology originally?

25 A I read books.

1           Q     And how did you get exposed to other experts in  
2 the field of geology?

3           A     Because of my discoveries on mineralization,  
4 and contacting people like Mr. Green from Amax, which is  
5 headquartered in Phoenix, Amselico, which is headquarters  
6 in Ely which is the precious metals division of the Rich  
7 Corporation which owns Kennecott, American Mining Company  
8 which is owned by Coors Beer; Buteux, which is owned by  
9 the French government that sent the crews cruise in here  
10 to explore the strip out here for uranium, and then the  
11 price of uranium went to pot, and so they went to gold,  
12 and I had drilling programs with them.

13          Q     Let's go back to each of those and see if we  
14 can pin down a rough date for when you had that exposure.  
15 Again, you just named off five companies. I'm sorry I  
16 didn't write them down. Let's start with Buteux since  
17 that was the last one. Roughly when were you out with  
18 Beauteux?

19          A     In the late 1980 or early 90s.

20          Q     And that was on the Arizona Strip you said?

21          A     No, they were there -- that was on the Beaver  
22 Dam on gold property.

23          Q     When you say the Beaver Dam, can you show us on  
24 the map what you're referring to?

25          A     This is Marty Larsen's we're taking it, and

1 right about there.

2 Q Okay. So the witness is indicating a mile or  
3 so north of the private property marked on Exhibit 1 as  
4 ML for Marty Larsen homestead.

5 A May I make a comment?

6 Q Please.

7 A Marty Larsen had two homesteads. He had the  
8 lower homestead and also had the upper homestead. So he  
9 has two fields.

10 Q Would the lower homestead be approximately  
11 where this square is, and it says ML down in the Motoqua  
12 area?

13 A Yes.

14 Q And that was previously marked?

15 A And Nelsons was at Motoqua, Motoqua is a  
16 Shivwit word meaning post office.

17 Q And we'll get there. So Buteux, what was  
18 another company you went out with?

19 A American Mining which was owned by Coors Beer.

20 Q And what was the approximate date that you were  
21 out with them?

22 A Be in the 80s, 90s.

23 Q Okay. And can you remember any other companies  
24 that you were out with?

25 A Amselico.



1 Q When were you out with Amselico?

2 A In the late 90s, early 2000s.

3 Q Were there any other companies?

4 A Western Gold and Uranium.

5 Q Approximately what date was that?

6 A That would have been in the -- I had  
7 headquartered them. They lived in my motel, and I sold  
8 out in '68, and they couldn't pay their bill when they  
9 left, so they left me a Model J Joy drill on an Army six  
10 by six for the bill. So I would say be '62 to '65.

11 Q Which areas of the county did you go out with  
12 Western Gold and Uranium?

13 A The Beaver Dams.

14 Q Is it safe to say that all the companies you  
15 went out with, you were on the Beaver Dam area in this  
16 northwestern portion of the county?

17 A All with the exceptions of Mr. Green who,  
18 Molycorp, who headquarters in Phoenix, and that drilling  
19 program was on the Tooley desert at the bottom of Pine  
20 Mountain.

21 Q Is that on this map?

22 A I doubt it, no.

23 Q Is it in the state of Utah?

24 A No, Nevada.

25 Q Jack, were there any other companies that you

1 were out with?

2 A Tenneco.

3 Q And approximately when were you out with  
4 Tenneco?

5 A During their operation of the Gold Strike mine,  
6 and that would have been five to ten years ago.

7 Q In the 2000s?

8 A Yes.

9 Q Are you aware of some of the broader history of  
10 mining and mineral extraction in Washington County?

11 A Yes, I am.

12 Q What's the earliest you were aware of people  
13 extracting minerals from within the county?

14 A Silver Reef.

15 Q Silver Reef is in the Leeds area?

16 A It is.

17 Q And approximately when or roughly when did that  
18 occur?

19 A After it was abandoned. It would have occurred  
20 when I was 15 or 16 years old.

21 Q They were still mining Silver Reef during that  
22 time?

23 A No, they were not.

24 Q It was before your lifetime?

25 A Yes, it was.

1 Q And what did they mine?

2 A Not before my lifetime, but --

3 Q Thank you. Before your memories?

4 A Yes.

5 Q And what did they mine in Silver Reef?

6 A Silver and sandstone, which shouldn't occur.

7 Q Was it a sizable operation?

8 A Yes. Had a town.

9 Q And that ended early in your life?

10 A Yes.

11 Q What other mining operations have occurred in  
12 the county that you're aware of?

13 A The Apex Mine which is on the West Mountain.

14 Q Can you show us that on this map?

15 A Okay. Where is Old Highway 91?

16 Q Old Highway comes out of the St. George/Santa  
17 Clara/Ivins area here. This is the Indian reservation,  
18 and then it goes south towards Nevada.

19 A Okay. So when we go over the crest of it, we'd  
20 take this road off right here, Bulldog Pass. We'd take  
21 that road off right there.

22 Q Okay. Approximately when was the Apex Mine  
23 operating?

24 A The Apex mine was operated at the -- one of the  
25 earliest by Judd, Willey and Lund, who had the Judd Store

1 here, which was they had one in Pioche, they had one in  
2 Enterprise. They were involved in a lot of different  
3 businesses. And they built a smelter on Diagonal.

4 Q Diagonal is --

5 A In St. George. Prior to that, the original  
6 discovery, the smelters was built at Shem, which is the  
7 upper end of the Shem Dam going to Gunlock. And there  
8 was a town at Shem, and they built their coke ovens and  
9 refined the ore there.

10 Q Just to orient us on that, can you point to the  
11 rough area that that would have been on the map?

12 A Where is our Gunlock Road?

13 Q This is the Old Highway 91. This is the  
14 Gunlock, and Gunlock Reservoir shows on the map.

15 A Okay. Gunlock Reservoir shows on the map. I'd  
16 say about right there.

17 Q The witness has pointed to a small piece of  
18 private property around road 0145. And sorry, around  
19 what time was this that they were doing that?

20 A This was in team and wagon days. So I can't  
21 give you a date on it.

22 Q Was it during your lifetime?

23 A Yes, I would say.

24 Q Did you ever visit the mine during your  
25 lifetime?

1           A     Many times.

2           Q     When it was operational?

3           A     Yes.

4           Q     And how did you get to the mine when you did  
5 that?

6           A     I drove there.

7           Q     Approximately what years was it or decade that  
8 you visited the mine?

9           A     In the 40s.

10          Q     How long was the Apex Mine operational?

11          A     It was operational at two different times.  
12 M. Cox was the last person to operate it, and he operated  
13 it during the war. The government subsidized him. And  
14 he shipped the ore to Cedar City by truck, and it was  
15 sent to Salt Lake to be refined.

16          Q     When you say the war, which war do you refer  
17 to? Which war is the war?

18          A     Second World War.

19          Q     How do you know that they did that during the  
20 Second World War?

21          A     Because I knew the miners, and I knew M. Cox  
22 and I knew M. Cox's son.

23          Q     Thank you. So that was the first time it was  
24 operational during the Second World War?

25          A     No, no. It was operational back in the team

1 and wagon days.

2 Q Okay. And the time that it was operational in  
3 Second World War, did it continue operating for quite a  
4 number years?

5 A Yes, but not for copper. They operated for  
6 germanium and gallium.

7 Q And approximately how long was that mine  
8 operational?

9 A For which? Germanium and gallium or in total?

10 Q So let me go back. They mined copper out of  
11 it during the Second World War. Did they continue mining  
12 copper after the war ended?

13 A Yes.

14 Q For approximately how long?

15 A Several years.

16 Q Did you visit the mine during the time they  
17 were still mining copper out of it?

18 A Yes, I did.

19 Q And how old were you at that time?

20 A I'd probably be in my 20s.

21 Q So that would have placed this in the 1950s?

22 A Yes.

23 Q And was that around the time that they stopped  
24 mining copper?

25 A Yes.

1           Q     How long was it closed between when they mined  
2 copper and when they started mining other minerals?

3           A     I can't tell you that.

4           Q     Do you remember when they started mining the  
5 other minerals?

6           A     Absolutely.

7           Q     Can you give me an approximate date?

8           A     Be in the 1990s.

9           Q     Did you say it was in the early or late 50s  
10 they stopped mining copper?

11          A     I would say that, yes.

12          Q     Early or late 50s?

13          A     I cannot tell you.

14          Q     Okay. So we've discussed the Silver Reef area,  
15 we have discussed the Apex Mine area, which just for the  
16 record you had said that you accessed by the Bulldog Pass  
17 Apex Road 9921. Approximately where was the mine in that  
18 area?

19          A     Here's Old Highway 91, and we come off here.  
20 It's right along in here.

21          Q     Near the Indian reservation?

22          A     If I was judging, I would say right there  
23 because it's a fault, and I can show it to you.

24          Q     So the witness has pointed to an area west of  
25 the Bulldog Pass/Apex Road near where the BLM area and

1 the Indian reservation meet. I'm going to mark that  
2 approximately right here.

3 A If this is the West Mountain, which I believe  
4 that it is, yes, I'd say right there, right where that V  
5 is.

6 Q And just to orient us, this is the Indian  
7 reservation?

8 A Yes.

9 Q So I'm going to mark --

10 A And it's just -- sorry.

11 Q Apex. Are you aware of other mineral  
12 extraction operations in Washington County?

13 A The gold from Gold Strike.

14 Q Can you point to us where the Gold Strike mine  
15 was at? Sorry, I can orient you. You have 91, you have  
16 Jackson. We actually have Gold Strike marked on the map  
17 here.

18 A Here's your Gold Strike Road going off here,  
19 and Gold Strike would be right in here.

20 Q Okay. The witness has pointed to private  
21 property.

22 A No, that private property is up on -- well,  
23 yes, private property patented. There is six patents.

24 Q Up on the area marked as Gold Strike at the  
25 northeast end of the Gold Strike Road. When was the



1 mining operation in Gold Strike?

2 A The geologist at Tenneco was the one that last  
3 operated it. Before that, there was six patented claims.  
4 One called the Surprise, one called the Beaver Tail,  
5 Kennecott Flat, and I can't tell you what the other two  
6 were. And Lonnie Hafen, who was the geologist for  
7 Tenneco, because he was raised here, acquired all six of  
8 the patented pieces of property for Tenneco, and he took  
9 charge of the development of the mine. And at the time  
10 that they had the grand opening, I was invited, me and my  
11 wife, there because Tenneco also had some leased ground  
12 from us, claims on BLM, and they had drilled and had an  
13 ore body.

14 Q Would you say that the Gold Strike mine with  
15 the Tenneco operation that you're referring to began  
16 after 1976?

17 A Yes. Oh, yes.

18 Q Was there any mineral extraction in the Gold  
19 Strike area prior to 1976?

20 A Absolutely.

21 Q Can you describe that for us?

22 A I was told that an old prospector came up the  
23 Beaver Dams prospecting. He went up the West Fork and  
24 lost the color. So he turned and went up the East Fork,  
25 and he followed the East Fork of the Beaver Dams and

1 panned right up to the Hamburg Mine. He came back down  
2 to the wagon road where old Mr. Woodard, which the  
3 Woodard High School is named after, he was a Texas  
4 cattleman that run cattle out there, and he had his  
5 headquarters right there. And the man came in and asked  
6 him if he had a rider going to St. George so that he  
7 could take the papers and file them for his claims. And  
8 Woodward turned around and bought him with eagles and  
9 double eagles, those claims, because he seen the rock,  
10 and he didn't know much about minerals. And from there  
11 is when it was operated.

12 MS. STIMMEL: Objection, hearsay.

13 Q How did you learn of that? Those events?

14 A That's common knowledge.

15 Q When you say common knowledge?

16 A My dad told me.

17 Q Approximately what year would that have  
18 happened?

19 A Be back in the team and wagon days.

20 Q Before you were born?

21 A It could have well been, yes.

22 Q Was -- and that was, sorry, give me a second.

23 For the record, the Hamburg and the East Fork, the  
24 Hamburg is marked on the map as previously marked on the  
25 map originally, the East Fork Wash of the Beaver Dam, so

1 we have marked as East Fork. And just to clarify, the  
2 East Fork goes from -- can you show us where the East  
3 Fork --

4 A The East Fork goes from Nelson's homestead,  
5 divides -- let's find where the river is.

6 Q When you say Nelson's homestead, is it their  
7 lower one or upper one?

8 A No, their lower one. Right, Cougar Pass.

9 MS. STIMMEL: Can we clarify for the  
10 record Nelson --

11 A This is the East Fork right here.

12 Q Okay. And the witness is indicating, it's also  
13 marked on the maps East Fork?

14 A East Fork, um-hmm, right there.

15 Q Does that run up to where we have East Fork  
16 marked here?

17 A Yes.

18 Q Runs up adjacent to the Gold Strike area?

19 A Yes, it does.

20 Q When you say Nelsons, that's separate from  
21 Larsens?

22 A Yes, it is.

23 Q My mistake on that. Where was the Nelson  
24 property?

25 A The Nelson property is right when you drop off

1 from the road down into the Beaver Dams. So you take the  
2 road from Jackson Road out here, and you drop into the  
3 Beaver Dam's -- I wish I had brought my glasses. Okay.  
4 Beaver Dam Wash, okay. He would be right here.

5 Q In the Motoqua area?

6 A Yes. In fact, Motoqua is on his ground. They  
7 had a cedar log building. The mail was left there.

8 Q At the time that that -- is that the earliest  
9 prospecting that you have heard of in this area that  
10 you're aware of?

11 A Gold Strike?

12 Q That story of the prospector coming up the  
13 wash?

14 A Yes, it is.

15 Q Would there have been roads that he would have  
16 followed at that time in this area?

17 MS. STIMMEL: Objection, foundation.

18 Q You can go ahead and answer.

19 A Again?

20 Q So at the time that that happened, which would  
21 have been approximately in the 1920s or 1930s, would  
22 there have been roads in this area?

23 A Yes. I was born in '29, and my dad was at  
24 Jackson and there was roads there. The roads went into  
25 the Beaver Dams and crossed over to Dodge Spring into

1 Nevada. It also went up the Beaver Dams, and the ore  
2 from Silver Reef and from the Apex was put on a wagon and  
3 hauled out to the Beaver Dams and put on a steam engine  
4 with one car behind it and taken up the road that they  
5 built to get to Acoma, the rail head. And one wheel of  
6 that steam engine is up at Ross Matthews' ranch at the  
7 head of the Beaver Dams today.

8 Q Matthews ranch would be at the end of Matthews  
9 Ranch Road?

10 A That is right.

11 Q We have that marked on another exhibit. Was  
12 there other mineral extraction in the Gold Strike, the  
13 broader Gold Strike area, the northwestern portion of the  
14 county that you're aware of?

15 A Silver on side of Mineral Mountain.

16 Q I would like to mark Mineral Mountain if you  
17 could locate that for us. We have Cougar Pass Road. We  
18 have Daggett Flat?

19 A So Mineral Mountain is right here.

20 Q We have Black Canyon.

21 A Black Canyon.

22 Q Butcher Knife?

23 A Okay. Butcher Knife. Okay, Mineral Mountain  
24 is right in here.

25 Q Is Mineral Mountain to the -- is it at the end

1 of Butcher Knife? Is it down Butcher Knife?

2 A It is at the end of Butcher Knife.

3 Q I'm sorry, what is Butcher Knife?

4 A Butcher Knife is a wash that had a road in it.  
5 You had Butcher Knife, Slaughter Creek and Bull Mountain  
6 which were all named because when the pioneers went out  
7 there, that was where the Spanish Trail went through down  
8 below there, and there was herds of wild cattle and they  
9 gathered them and brought them in.

10 Q On the map Butcher Knife is previously marked  
11 running parallel to the road 0036. Is Mineral Mountain  
12 located at the northern end of the Butcher Knife?

13 A Yes, it is.

14 Q And I'm going to mark that. Jack, you said  
15 they excavated silver from Mineral Mountain?

16 A Yes.

17 Q Approximately when did that occur?

18 A That would have occurred at the time that Jacob  
19 Hamblin lived in Santa Clara, which the Church still has  
20 the building that he lived in over there, and he was  
21 renowned for his ability with shooting. And Indians  
22 brought him -- the Paiutes brought him what lead to make  
23 the bullets out of. And when he smelted it down to pour  
24 it in the molds, he found out it contained a high amount  
25 of silver. So the pioneers went out, and finally the

1 Indians showed them where they got it from, and there has  
2 been a tremendous amount of exploration there, but no  
3 major ore body found except on the west side, which they  
4 found a massive gold deposit there that Tenneco drilled.

5 Q On the west side of --

6 A Mineral Mountain.

7 Q We're going to step back a little bit. You  
8 stated Jacob Hamblin was a resident of Santa Clara?

9 A Yes, he was.

10 Q And he had interactions with the Paiute band?

11 A Absolutely.

12 Q Was Jacob Hamblin -- approximately when was  
13 Jacob Hamblin in the area?

14 A I could not tell you that.

15 Q Was he an early settler?

16 A Definitely.

17 Q Was he one of the original settlers of the  
18 greater St. George area?

19 A Yes.

20 Q Approximately when was the gold -- you stated  
21 that there was -- Tenneco drilled for gold on the west  
22 side of Mineral Mountain?

23 A Yes, they did.

24 Q Approximately when did that occur?

25 A At the time they operated the Gold Strike

1 property.

2 Q Which would have been in the 1990s?

3 A Yes.

4 Q Early 2000s I believe we said?

5 A Yes.

6 Q And if we haven't said that, approximately what  
7 decade would have that been?

8 A In 1990s, 2000s.

9 Q Sorry, that was so blatantly leading. Are you  
10 aware of any other mineral extraction operations in the  
11 Mineral Mountain area?

12 A No, I am not.

13 Q You stated that your family has had several  
14 claims in that area?

15 A Absolutely. We took the Model J Joy and a Cat  
16 and built roads in there and did some drilling.

17 Q Okay. Let's go back. So when was the first  
18 claim that your family had in the Mineral Mountain area?

19 A The first claim would have been the Sunnybrook.  
20 That's where my dad started from. That's the main one.

21 Q Approximately when would that have started?

22 A That started during the war.

23 Q During which war?

24 A Second World War.

25 Q How large was that claim?



1           A     Twenty-seven claims.

2           Q     When you say -- when you say a claim, can you  
3 describe for the record what that entails?

4           A     I'm not sure. It's been so long. I believe  
5 it's 600 by 1,200, but I am not positive of that. I'd  
6 have to review it.

7           Q     You mean 600 feet by 1,200 feet?

8           A     Yes. I could be wrong on that. I'd have to  
9 review that.

10          Q     And your father had 27 claims?

11          A     He had 27 claims.

12          Q     Did he have all of those during the time of  
13 Sunnybrook?

14          A     Yes. They were the 27 claims were on the  
15 Sunnybrook. Then he had -- whoops.

16          Q     Can you point to us on the map where those --  
17 sorry, one more question before we do that. Were those  
18 27 claims adjacent to each other?

19          A     Yes, they were.

20          Q     Can you point to us on the map where that was?  
21 We have Mineral Mountain?

22          A     Yeah, but you were on the Beaver Dam west of  
23 the Beaver Dam in here, and those claims would be -- this  
24 be the dugway here, those claims would be about right  
25 there.

1 Q Okay. The witness --

2 A That road ends at the cabin. So it's right  
3 there.

4 Q So the witness is indicating a portion  
5 somewhere between a half mile and a mile south from the  
6 end of the Beaver Dam Wash Road. Does that sound  
7 correct, Jack?

8 A That is correct.

9 Q I'm going to mark that as an SB for Sunnybrook,  
10 and you just stated that there was a cabin on that road?

11 A There are two cabins at the end of the road.

12 Q Whose cabins are those?

13 A One, the first one was built during the 1940s  
14 by my brother. It is still there. Milt Holt, my cousin  
15 who become a world famous lion hunter and catered to  
16 people all over the world, the wealthy, because he  
17 guaranteed them a lion. And he took them out and he  
18 built the other cabin across the creek from my brother's.

19 Q Approximately what year did Milt Holt build his  
20 cabin?

21 A In the 50s.

22 Q And sorry, what was your brother's name that  
23 built the cabin?

24 A Leo.

25 Q I'm going to mark at the end of the road at the

1 end of Beaver Dam Wash Road 0006, HC, for Holt cabins.  
2 So we have discussed, just to recap, the Gold Strike  
3 mining operation in the 90s and 2000s, the Sunnybrook  
4 claims that your father had during the time of World War  
5 Two. Did he continue mining that for some time?

6 A He prospected it and done some digging on it,  
7 but that was done -- the incline shaft goes plum through  
8 the top of the mountain. And when you get inside there  
9 are two drifts, one to the south and one to the north.  
10 It was during the time that this was done was before  
11 dynamite, because I found the rings in excavating off  
12 from the black powder.

13 Also on the Dobbin Wash, which is on the west  
14 side of the Sunnybrook Ridge, I was setting there with my  
15 prospecting buddy, Paul Lamareux, on the edge of the  
16 water up on a big rock up there on Bull Mountain, and I  
17 heard this coyote yapping, and I heard this rabbit  
18 squealing, and we stayed still and this coyote come after  
19 that rabbit right there, and all of a sudden that rabbit  
20 turned and went into a hole. And I looked at that hole,  
21 and this is the bottom of Dobbin Wash. And I looked at  
22 that rabbit hole, and I said that's utterly impossible  
23 because that's solid ledge there.

24 There is a little alluvial that's rolled down.  
25 I was curious enough that I went plum back up to the top

1 of Sunnybrook ridge and got my shovel and came down and  
2 dug in that hole. I hadn't spent 15 minutes, and I come  
3 to the top of a tunnel. And yet there is not a sign of a  
4 dump in the wash, because they dumped in the wash and the  
5 flash floods had carried it away.

6 And me and Paul Lamareux went in that that  
7 afternoon, and we got about two-thirds of the way back in  
8 there, and I was starting to sweat and my heart was  
9 racing, so we moved back out and went back to the cabin  
10 so it could air out that night.

11 Then we went back in it again, and they had --  
12 people that had dug the Sunnybrook had put this drift in,  
13 and they had hit the main vein of the Sunnybrook ore.  
14 And at the back of that main vein there is a ladder  
15 leaning up with hand-hewn nails, and the ladder is all  
16 cut from oak. And I can even show you where the oak come  
17 from. And they made rails that they had their ore cars  
18 pushed on out of oak. And I have a piece of that oak.

19 Q And so from your personal experience exploring  
20 that Sunnybrook mine, approximately when would you say  
21 that they were mining that?

22 A They were mining that -- they were exploring  
23 and attempting to mine it about the same time of Silver  
24 Reef.

25 Q Prior to the Second World War?

1           A     Yes.

2           Q     Are you aware of any other mineral extraction  
3 operations on or around Mineral Mountain?

4           A     Ross Matthews has drilled up there for silver.

5           Q     Approximately when was that?

6           A     After the war.

7           Q     Was that after 1976?

8           A     No, that was before.

9           Q     Okay. So we have Ross Matthews. Were there  
10 any other operations that you were aware of up there?

11          A     Yes. Old man Knight, who founded Knightville  
12 up north and had the fabulous lions, he married Celt  
13 Hafen's grandmother's sister. And during the wintertime  
14 he came down to the ranch, and he dug a shaft into Pine  
15 Mountain that's scary to even get in there.

16          Q     Where is Pine Mountain located at?

17          A     Pine Mountain is located this side of Barclay.

18          Q     I'm sorry, is it on the map?

19          A     Okay. We run out here, Beaver Dams, this is  
20 Cougar Pass, and we're going up the head of the Beaver  
21 Dams. It would be over in here somewhere. What does  
22 that say right there?

23          Q     That's the Matthews Ranch Road.

24          A     Matthews Ranch Road, okay. And then that goes  
25 on over into Barclay.

1 Q So Barclay is in the state of Nevada?

2 A Yes, it is.

3 Q And at this time I'm just getting for when we  
4 get over to this area, and maybe we can just wait until  
5 we do that, names of different peoples that mined this  
6 area and different operations and the time to help us  
7 orient ourselves on all these roads over here. Are you  
8 aware of any other mineral extraction that occurred on or  
9 around Mineral Mountain prior to 1976?

10 A No, I am not.

11 Q Okay. That's just fine. Let's go ahead and  
12 take a break.

13 MS. BORGESON: It's 9:44.

14 (Short break was taken.)

15 MR. CLARK: Back on the record.

16 MS. BORGESON: It's 9:54 a.m.

17 Q Okay. Jack, we are going to start with the  
18 Beaver Dam Wash Road number 0006, that is on this map in  
19 this portion of the county. That's on the map on Exhibit  
20 Number 1 that the county, the western half of Washington  
21 County map is being used. Are you familiar with the  
22 Beaver Dam Wash Road?

23 A Absolutely.

24 Q When was the first time that you remember being  
25 on that road?



