

1 A. Uh-huh. He was the site manager, or the
2 equivalent of the title.

3 Q. And when you introduced him to Sy and
4 Eliot Bernstein, do you know what he was doing at that
5 point in time?

6 A. He was working at a - and running a - a -
7 what could we call it, a company that was
8 manufacturing - developing and manufacturing greens
9 cutting equipment. It's called Diamond Turf, I think.
10 Or something like that.

11 Q. Do you know if he was terminated from his
12 job at Diamond Turf or did he leave voluntarily?

13 A. I don't know which.

14 Q. At the time that he took the job with
15 iviewit, do you know if he was gainfully employed at
16 that point or not?

17 A. No. I don't know if he was still employed
18 by Diamond Turf or not.

19 Q. Did you ever see Mr. Utley's resume?

20 A. I don't recall if he was -- Did I ever see
21 his resume? Not to my recollection.

22 Q. Did he ever provide you with any
23 background information?

24 A. He could have, but I don't recall it.

25 Q. C.V. or anything of that nature to give to

1 the Bernsteins?

2 A. I don't recall.

3 Q. Are you aware of any patents that
4 Mr. Utley holds?

5 A. No. No, I'm not.

6 Q. Have you ever -- I'm sorry, go ahead.

7 A. I'm not aware of anything other than if he
8 referenced patents in his own deposition, but I
9 didn't - I didn't follow that closely in his
10 deposition.

11 Q. So you - you read a transcript of his
12 deposition?

13 A. Yes.

14 Q. Now, with regard to his - I'll take
15 Mr. Utley's employment by iviewit, have you ever
16 represented Mr. Utley personally in any matters?

17 A. We formed a corporation for him in - I
18 believe in 1993.

19 Q. Do you recall the entity, the corporation?

20 A. I think it was a consulting corporation.

21 We just formed it. I mean, we just formed it. That's
22 all we did.

23 Q. Right.

24 A. We didn't do any more work for him.

25 Q. Just formed the consulting corporation?

Utley in his deposition claims
that Wheeler never
represented him.

CLICK HERE TO SEE
UTLEY DEPOSITION
CONTRADICTING WITH
WHEELER STATEMENT.

1 A. Right.

2 Q. Did you ever advise anyone at iviewit
3 other than, obviously, Mr. Utley, who knew that you
4 had represented him in the past, that you had
5 represented Mr. Utley at one point?

6 A. No.

7 Q. Was there any - any question of any
8 conflict?

9 A. No.

10 Q. Was there any employment agreement signed
11 by Mr. Utley between Mr. Utley and iviewit?

12 A. Yes.

13 Q. And who prepared the employment agreement?

14 A. Proskauer.

15 Q. And did you not think that potentially
16 posed a conflict?

17 A. No.

18 Q. And who did you represent in the
19 preparation of that employment agreement?

20 A. The company. We did not represent
21 Mr. Utley.

22 Q. So there was no waiver of conflict, no
23 conflict letter, nothing went out with regard to
24 Mr. Utley and iviewit?

25 A. No.

Wheeler perjures himself here as he stated in sworn statement to THE Florida Bar that he did tell Iviewit about his former representation of Utley at DTE, where the Company he formed for Utley is where the stolen patents from his last employer were funneled. This is a material misrepresentation and perjury.

[CLICK HERE TO SEE WHEELERS PERJURED STATEMENTS TO THE FLORIDA BAR](#)

CAUGHT IN A PERJURED STATEMENT WHEELER ATTEMPTS TO EXPLAIN THE PERJURED STATEMENT TO THE FLORIDA BAR AND ATTEMPTS TO CLARIFY HIS PRIOR PERJURY. FLORIDA BAR SHOULD HAVE BROUGHT CHARGES FOR THIS.

[CLICK HERE TO SEE WHEELER RETRACTION OF HIS PERJURY](#)