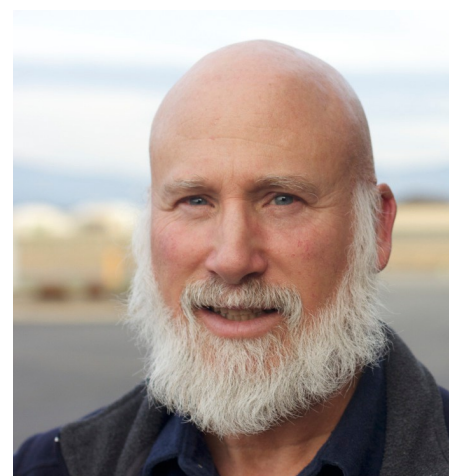


**DEAN ISAACSON
PROJECT MANAGEMENT
CONSTRUCTION FORENSICS**



CONTACT INFORMATION

Name: Dean Isaacson
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PERSONAL INFORMATION

Date of Birth: 25 November 1953
Place of Birth: Seattle, WA
Gender: Male

EMPLOYMENT HISTORY

1975 - 1989: Sole Proprietor, General Contractor, owner

Dean Isaacson began his contracting career shortly after returning from military service with the Army Corps of Engineers. His first projects were general remodeling and room additions. The following year (1976), he built two homes on speculation and began a long, successful career of spec building. During the early years, he performed most the carpentry related work himself; sometimes with the help of an employee or two.

Aside from spec projects, he performed general remodeling and subcontracting. He worked as a subcontractor to larger contractors in the areas of foundations, framing, roofing, siding, metal framing and drywall, even subcontracting to house movers and log home builders. The roofing contracts were specialized for steep roofs. The siding operations, in the early eighties, grew to three crews and over one-hundred fifty homes per year. The metal framing and drywall subcontracts included several government buildings, offices and warehouses.

1989 - 2004: Dean Isaacson, Inc., General Contractor, president

A Washington Corporation engaged in the business of home building, small developments, apartments, small office buildings, demolition and general contracting. From 1989 to 1999 our primary business was speculative home and apartment construction, in Western Washington and the City of Moses Lake in Eastern Washington. Most years, we built six to twelve speculative homes and three or four custom homes - we were not tract builders.

After moving to Idaho, in 1999, our business was a mix of speculative homes, custom homes, room additions and underground piping (water and sewer). For several years, we were licensed Public Works contractors in the State of Idaho and held the complex septic install certification with Panhandle Health District.

2004 - 2010: Dean Isaacson, Inc dba Idaho Contractor, president

Registered general contractor in the State of Idaho (RCE 688) - dropped Washington registration Nov 2009. During this period, we built two Insulated Concrete Form homes. Beginning in 2007, we offered project management services to do-it-yourself

home builders. We maintained quality control on the job site and administered the schedule for the clients.

2006 - Present: Cougar Gulch Group, LLC., managing member
Construction Forensics, safety management services, internet services, marketing and project management.

2015 - Present: Bomra, LLC, managing member
Registered general contractor in the State of Idaho (RCE 40524). DBA Idaho Contractor. We are general contractors, primarily remodeling residential construction.

EDUCATION and CERTIFICATIONS

- 1972: graduated King's Garden High School, Seattle, WA
- 1975-76: Several night classes at Edmonds Junior College related to business management, accounting and advertising, no degrees or certificates.
- Several CEU classes through the years but did not retain any certificates.
- July 2010: Certified Safety Administrator from National Association of Safety Professionals.
- COMPUTER SKILLS: Microsoft Word and Excel; PHP programming; dBase and MySQLi databases. Have used several project management programs at least once and am able to get up to speed with most programs quickly.

REGISTRATIONS (LICENSES):

- Idaho Contractor Registration RCE-688 (2005 - 2010)
- Idaho Public Works License (approx 2002-2005)
- Washington State General Contractors License - corporate 1989-2009
- Washington State General Contractors License - sole proprietor 1976-1989
- Idaho Contractor Registration RCE 40524 (2015 -)

Dean Isaacson has been an expert witness on over two dozen cases. He is skilled at construction forensics - figuring out how something went wrong. He has built and managed about 300 buildings (homes, commercial buildings and apartments); remodeled over 1000 buildings (some were minor repairs, some were quite extensive and expensive); worked on hundreds more as a subcontractor; and he built a house next door to President Richard Nixon's brother. He can help if you are looking for accurate take-offs, aggressive scheduling, an eye for detail, quality control and a successful communicator with clients and vendors. He has over thirty-five years experience.

Dean has learned the ins and outs of internet marketing, learned to program in PHP, set up databases using MySQL and styling with CSS. In the early 80s he dabbled in computer programming and set up the company books on dBase. For estimating projects he developed computer spreadsheets based upon the Uniform Construction Index (UCI), later to become MasterFormat - and he still uses these spreadsheets. He has one spreadsheet posted on the internet which is downloaded by others approximately ten to twenty times a day.

Several years ago, Dean brought Extreme Industrial Coatings (EIC) of Airway Heights, Washington, safety performance rating at ISN (a third party certifier for major oil producers and agriculture mills) from an F to an A in five weeks. ISN told him this was a record.

SUMMARY OF FORENSIC CASES

- **WONG VS HYSKELL**, [unknown court filing]. Retained October 1997 by Plaintiff Wong. A dispute had arisen between business partners regarding a project that had begun twenty years earlier. Our job was to review all project receipts and assess the work completed on the project residence. We were able to successfully reconstruct the project on paper and determine which receipts went into the joint venture project and how much of the plaintiff's money was used on other projects. The case went to court but settled as Dean Isaacson was called to testify. The case was settled entirely in our client's favor. The attorney for plaintiff was Jeffery Herman of Seattle, Washington.
- **LESLEY VS WILEY**, [unknown court filing]. Retained May 1998 by Plaintiff Lesley. In the late 90s, Lesley purchased a waterfront home from Wiley, in Belfair, Washington. The entire floor system was bug infested and rotted. Our job was to assess the damages and estimate the cost to repair. We spelled out the extent of the damages and explained how we arrived at each cost. Armed with our report, the client was able to settle out of court just prior to deposition for ninety percent of our projected costs. The attorney for plaintiff was Jeffery Herman of Seattle, Washington.
- **PROFESSIONAL COATINGS INC, VS DUWAMISH MANOR ASSOC.**, [no court filing]. Retained September 1998 by Plaintiff Professional Coatings. According to the lease agreement, the landlord, Duwamish Manor Assoc., was responsible for structural and exterior maintenance. However, the landlord advised the tenant, Professional Coatings, they were responsible for the replacement of the roof, citing their operations as a reason. We were hired by the plaintiff tenant to give an assessment of the roofing and the roof structure. We analyzed the effect of the operations on the roof and included other details that were critical to the negotiation between the landlord and tenant and submitted a report. The landlord then decided to pay for the replacement of the roof. This case was referred to us by an attorney but there was no attorney involved.
- **MALONE VS ARNE'S CONSTRUCTION ENTERPRISES INC.**, [no court filing]. Retained March 1999 by Plaintiff Malone. In the late 90s, Malone hired Arne's Construction Enterprises to remodel his home. This was a cost-plus remodel gone real bad. We discovered of the one-hundred forty thousand paid to the company, less than half had been expended for materials and labor. Of the invoices submitted by the construction company to document their costs, we found many items did not apply to the client's project and many were duplicate billings. Armed with our report, the attorney for Malone was able to work out a settlement without filing a lawsuit. The attorney for plaintiff was Frederic Reed of Seattle, Washington.
- **LOMBARDI VS CLAUSEN**, [unknown court filing]. Retained June 1999 by Plaintiff Lombardi. In the late 90s, Lombardi purchased a home from Clausen in an exclusive, yet older, area adjacent to Bellevue, Washington. The home was infested with molds, mildew and bugs. The house was inspected prior to closing but none of this damage was reported to the purchaser. We found key evidence that demonstrated prior

knowledge and concealment on the part of the seller. With our report, the client was able to work out a satisfactory settlement with the seller's insurance company. The attorney for plaintiff was Jeffrey Herman of Seattle, Washington.

- **RUSSELL VS TATE**, [unknown court filing]. Retained August 1999 by Plaintiff Russell. Approximately 1986, Tate installed a fence on the mutual property line and damaged the Russell's sewer line in three locations. By 1999, the damage to the foundation and soils of the Russell home had become obvious. In Russell's clumsy attempt to repair the sewer, he removed the fence and damaged the Tate driveway. Tate, using the numbers from an expert witness, sued for damages in excess of twenty thousand dollars. We were called in to confirm or refute the actual replacement costs to repair the damage to the Tate property and evaluate the damage to the Russell home. Our report documented a reasonable cost to repair the damage to the Tate property to be less than seven thousand dollars, including the installation of a retaining wall that did not exist before but somehow became important to this case. We also documented damages to the Russell property to be in excess of fifty thousand dollars. The case was settled out of court in our client's favor. The attorney for plaintiff was Tamara Clower of Gig Harbor, Washington.
- **HENDRICKSON VS UNDISCLOSED**, [unknown case filing]. Retained September 2011 by Plaintiff Hendrickson. In 2010, Hendrickson hired a drive-by carport and garage construction company to build a large, three-bay carport in their backyard. The following year, the carport began to fall over. The company refused to make any corrections. We submitted a report noting the defective construction and the extensive work required to correct the situation and bring the carport to code. After, we submitted our report, Hendrickson's attorney was able to negotiate the removal of the carport and a full refund of their expenses, including attorney fees. The attorney for plaintiff was Scott Poorman of Hayden, Idaho.

Prior to *Spain vs Becker*, we did not keep a complete listing of our cases.

- **SPAIN VS BECKER**, [CV2013-00510, District Court, Latah County, ID]. Retained May 2014 by Defendant Becker. In 2011, M/M Spain hired a building contractor to build a horse barn on their property. There was no dispute some portions of the construction did not meet standard of care. However, the contractor's attorney suspected the damages listed in the architect/expert witness report were enrichments to the property rather than corrections. We reviewed the construction documents and the architect's report and were able to separate what items were needed to correct the situation and which items were improvements to the property. The attorney was able to use this report to successfully negotiate a substantially reduced settlement. The attorney for defendant was Todd Startzel of Spokane, Washington.
- **CURTIS LIVING TRUST VS ABC SEAMLESS HOME INC.**, [13-2-00784-01, Superior Court, Benton County, WA]. Retained May 2014 by Defendant ABC Seamless Home. Approximately twelve years earlier, ABC Seamless had replaced the exterior doors, windows and siding. This home had developed a serious case of mold. The Plaintiff's expert began with the presumption ABC was the cause of the mold and built his case from this position. We were able to show why ABC was not the cause of the mold; identify the causes of the mold in the house; and demonstrate via the Plaintiff's expert's own pictures how he had missed the cause of the mold and overlooked the facts. We testified at deposition in September 2014; the case was

summarily dismissed for procedural reasons. The attorney for defendant was Ryan Poole of Spokane, Washington.

- **CLANCY VS BESTWAY BUILDERS**, [unknown case filing]. Retained January 2015 by Plaintiff Clancy. The Clancy home is beset with problems due to missing footers and concrete foundations and slabs poured in freezing temperatures without protection and other such problems. This case is still pending. The attorney for plaintiff is Scott Poorman of Hayden, Idaho.
- **TIMBLIN VS ST JOHNS PROPERTIES INC DBA SHADY REST**, [CV15-260, District Court, Kootenai County, ID]. Retained October 2015 by Defendant Shady Rest. Plaintiff claimed injuries and other damages after stepping off a sidewalk and into a bay of meters on Defendant's property. Upon inspection of the property, we wrote a report outlining building code issues, general layout, measurements and descriptions. This case settled out of court. The attorneys for defendant were Ryan Janis and Nick Crawford of Boise, Idaho.
- **MAHAFFEY VS ALPINE CONSTRUCTION**, [15203202-4, Superior Court, Spokane County, WA]. Retained October 2015 by cross-claimed defendant, MM Wood Works. MM was the primary subcontractor. There were issues of poor workmanship which became exaggerated. We were able to write a report identifying objectively items needing to be redone and/or replaced and put a cost value to it. With the clear picture presented in our report, this case settled out of court to the satisfaction of all parties. The attorney for defendant was Todd Startzel of Spokane, Washington.
- **STELLA FARM VS EAGLE RIGID SPAN and QUALITY FENCING & CONST.**, [CV2013-01379, District Court, Bonner County, ID] Retained October 2015 by Defendant Eagle Rigid (manufacturer). Stella Farm claimed damages from the collapse of a horse arena against the manufacturer of the building frame and the contractor who erected it. We wrote a report analyzing the standard of care in the installation of the frame by the contractor. We were also able to add some forensic insight from evidence found in the photos. This case settled out of court. The attorneys for defendant (manufacturer) were Ryan Janis and Nick Crawford of Boise, Idaho.
- **LEWIS VS RIVERBEND BUILDERS NW INC**, [15202019-1, Superior Court, Spokane County, WA]. Retained October 2015 by Defendant Riverbend Builders. The builder terminated by the homeowner. Another builder was hired for completion and the costs skyrocketed from there. Claims against our client ranged from poor workmanship to code deficiencies. We were deposed and went to trial. We testified to quality of workmanship, code compliance, unsubstantiated claims against the defendant and business practice of plaintiff's replacement builder. The result was a unanimous jury in favor of our client, 24 April 2017. The attorney for defendant was Todd Startzel of Spokane, Washington.

"Todd had the opportunity to speak with some of the jurors and wanted to relay to you some of their comments regarding your testimony. They said they liked you very much, you came across very well, explained things in a great way, believable, and knowledgeable. Thanks again for all your assistance. On behalf of our office and Mr. Rice, all your work was greatly appreciated." - Kirkpatrick and Startzel [re Lewis v Riverbend Builders], April 2017. Ed Rice said, "I can't thank him enough for his help."

- **REED VS PRESERVE COLEMAN HOMES, LLC**, [CV-OC-1423540, Fourth Judicial District, Ada County, ID]. Retained January 2016 by Defendant Preserve Coleman Homes. We were hired to analyze what was wrong and who was responsible for the failure of a crawl access door which resulted in an injury. Armed with our report, this case was able to successfully settle out of court. The attorney for defendant was Nick Crawford of Boise, Idaho.
- **HUTCHINSON VS UMPHREY, ET AL** [no case number available]. Retained February 2016 by Plaintiff Hutchinson. This was a slip-and-fall during a construction operation which took place in a retail store during the normal hours of operation. In our report, we evaluated the standard of care necessary to protect the public during construction operations. This case was settled out of court. The attorney for plaintiff was Andrew Brassey of Boise, Idaho.
- **JJ'S CONSTRUCTION INC VS SKOCILICH**, [no case filed]. Retained May 2016 by Plaintiff JJ's Construction. The homeowner refused to pay a substantial amount of money upon completion of their residence under the pretext several items needed correction - all the while refusing to allow the builders to return to correct. In our report, we analyzed the home for standard of care and unfinished work. We were able to demonstrate how these items were punch list in nature and there were not code violations in the structure as claimed. This case settled quickly in favor of our clients. The attorney for plaintiff was Ryan Poole of Spokane, Washington.
- **THOMPSON VS LUKE JEANNERET CONSTRUCTION**, [13-200338-2, Stevens County Superior Court]. Retained October 2016 by Defendant Jeanneret. Thompson had retained an expert to review the construction performed by Jeanneret after Thompson had moved into the house and the result was a shopping list of claims and emotional appeals. At the site, I was able to demonstrate to Thompson how several claims were false and how to perform normal homeowner maintenance on several items. In my report, I was able to boil the plaintiff's expert's claims down to the few that mattered. This case settled out of court, March 2017. The attorney for defendant was Patrick Harwood of Spokane, Washington.
- **ROBINSON VS STORM MECHANICAL**, [CV-15-6999, Kootenai County District Court]. Retained October 2016 by Plaintiff Robinson. Robinson's place of business was damaged by water caused by defendant Storm. She performed the restoration while also remodeling and sued Storm Mechanical. We reconstructed the costs necessary to restore the premises to the prior condition, without improvements. We have been deposed but this case is still pending. The attorney for plaintiff is Arthur M. Bistline of Coeur d'Alene, Idaho.
- **ROBY VS TIMBERWOLF BUSINESS GROUP**, [16-2-02087-3, Spokane Superior Court]. Retained January 2017 by Defendant Timberwolf. We were hired, prepared for a site review, then the case settled in April. The attorney for the defendant was Ryan Poole of Spokane, Washington.

Our expert witness strategy is simple:

1. Stick with the facts;
2. Simplify the core issues and be instructive; and
3. Don't get sidetracked by emotional arguments.

We help you get to the root. We help you ask the right questions.

BUSINESS PUBLICATIONS AUTHORED

WORKPLACE SAFETY MANUAL V1.5, Cougar Gulch Group LLC, 2012, 407 pages, ISBN 9781300441717. A comprehensive safety manual and safety program guide for general industry and construction. Available at <http://www.lulu.com/shop/dean-isaacson/workplace-safety-manual-v15/paperback/product-20536981.html>

MASTERFORMAT CONSTRUCTION ESTIMATION SPREADSHEET, A popular MasterFormat based spreadsheet for residential and commercial projects. A history of the spreadsheet is posted online and the spreadsheet is downloadable at <http://cougargulch.com/updated-construction-estimation-spreadsheet-in-csi-masterformat/>

/s/ Dean Isaacson
managing member, Cougar Gulch Group, LLC