

UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF FLORIDA  
TAMPA DIVISION

ROBERT L. VAZZO, LMFT, etc., et al.,	)	
	)	
Plaintiffs,	)	
	)	Case No. 8:17-cv-2896-T-02AAS
v.	)	
	)	
CITY OF TAMPA, FLORIDA, et al.,	)	
	)	
Defendants.	)	
	)	

---

**PLAINTIFFS’ NOTICE OF FILING DEPOSITION TRANSCRIPTS  
IN SUPPORT OF MOTION FOR PRELIMINARY INJUNCTION**

Plaintiffs give notice of filing copies of the following documents, attached hereto, in support of Plaintiffs’ Motion for Preliminary Injunction (Doc. 85):

1. Transcript of Deposition of Sal Ruggiero, October 30, 2018;
2. Transcript of Deposition of Guido Maniscalco, as Rule 30(b)(6) Representative of Defendant City of Tampa, October 31, 2018; and
3. Transcript of Deposition of Jerrod Simpson, as Rule 30(b)(6) Representative of Defendant City of Tampa, October 31, 2018.

Respectfully submitted,

/s/ Roger K. Gannam  
 Mathew D. Staver  
 Horatio G. Mihet  
 Roger K. Gannam  
 Daniel J. Schmid  
 LIBERTY COUNSEL  
 P.O. Box 540774  
 Orlando, FL 32854  
 Phone: (407) 875-1776  
 Fax: (407) 875-0770  
 E-mail: rgannam@LC.org

*Attorneys for Plaintiffs*

**CERTIFICATE OF SERVICE**

I hereby certify that on this November 13, 2018, I caused a true and correct copy of the foregoing to be filed electronically with the Court's CM/ECF system. Service upon all counsel of record will be effectuated by the Court's electronic notification system.

/s/ Roger K. Gannam  
Roger K. Gannam  
*Attorney for Plaintiffs*

Vazzo v. City of Tampa  
Sal Ruggiero

10/30/2018

Page 1

IN THE UNITED STATES DISTRICT COURT FOR  
THE MIDDLE DISTRICT OF FLORIDA  
Tampa Division  
Civil Action No. 8:17-cv-02896-CEH-AAS

ROBERT L. VAZZO, LMFT, individually  
and on behalf of his patients,  
DAVID H. PICKUP, LMFT, individually  
and on behalf of his patients, and  
SOLI DEO GLORIA INTERNATIONAL,  
INC., d/b/a NEW HEARTS OUTREACH  
TAMPA BAY, individually and on behalf  
of its members, constituents and clients,

Plaintiffs,

vs.

CITY OF TAMPA, FLORIDA, and  
SAL RUGGIERO, in his official capacity as  
Manager of the City of Tampa  
Neighborhood Enhancement Division,

Defendants.

\_\_\_\_\_ /

\* \* \* \* \*  
DEPOSITION OF SAL RUGGIERO  
TAKEN AT THE INSTANCE OF THE PLAINTIFFS  
\* \* \* \* \*

DATE: October 30, 2018  
PLACE: 201 North Franklin Street  
Suite 3200  
Tampa, Florida 33603  
TIME: 9:56 - 12:59 o'clock p.m.

Florida Court Reporting  
561-689-0999

Vazzo v. City of Tampa  
Sal Ruggiero

10/30/2018

Page 2

1 APPEARANCES:

2 LIBERTY COUNSEL

PO Box 540774

3 Orlando, Florida 32854-0774

Telephone: 800-671-1776

4 Fax: 407-875-0770

Attorneys for the Plaintiffs

5 BY: HORATIO G. MIHET, ESQUIRE

Email: Hmihet@lc.org

6 BY: ROGER GANNAM, ESQUIRE

Email: Rgannam@lc.org

7

BURR & FORMAN, LLP

8 PO Box 380

Tampa, Florida 33601-0380

9 Telephone: 813-221-2626

Attorneys for the City of Tampa

10 BY: ROBERT V. WILLIAMS, ESQUIRE

Email: Rwilliams@burr.com

11

CITY OF TAMPA

12 315 East Kennedy Boulevard

Tampa, Florida 33602-5211

13 Telephone: 813-274-7599

BY: DAVID HARVEY, ESQUIRE

14 Email: David.harvey@tampagov.net

BY: JERROD D. SIMPSON, ESQUIRE

15 Email: Jerrod.simpson@tampagov.net

16

17

18

19

20

21

22

23

24

25

Vazzo v. City of Tampa  
Sal Ruggiero

10/30/2018

Page 3

1		
2	INDEX	
3	SAL RUGGIERO	PAGE
4	DIRECT EXAMINATION BY MR. MIHET	4
5		
6	EXHIBITS	
7	Plaintiffs' Exhibit Nos. 1&2 marked for	
8	identification	44
9	1: Sign-in Sheet for Meeting with Legal	
10	2: Code Enforcement Update PowerPoint	
11		
12	Plaintiffs' Exhibit No. 3 marked for	
13	identification	51
14	(Code Enforcement Conversion Therapy	
15	PowerPoint)	
16		
17	Plaintiffs' Exhibit No. 4 marked for	
18	identification	76
19	(City of Tampa Ordinance 2017-47)	
20		
21		
22		
23		
24		
25		

Vazzo v. City of Tampa  
Sal Ruggiero

10/30/2018

Page 4

1 The deposition of SAL RUGGIERO, witness, was taken  
2 before me, Rachele Cibula, Notary Public, State of  
3 Florida at large, at 201 North Franklin Street, Suite  
4 3200, in the City of Tampa, County of Hillsborough,  
5 State of Florida, pursuant to notice in said cause for  
6 the purpose of taking said deposition at the instance of  
7 the Plaintiffs in the above-styled action pending in the  
8 above-styled court.

9 THE COURT REPORTER: Raise your right hand,  
10 Please, sir.

11 THEREUPON,

12 SAL RUGGIERO,  
13 being by me first duly sworn to testify the whole truth  
14 as is hereinafter certified, testifies as follows:

15 THE WITNESS: I do.

16 DIRECT EXAMINATION

17 BY MR. MIHET:

18 Q. Good morning. Would you please state your full  
19 name for the record.

20 A. Salvatore Ruggiero.

21 Q. Good morning, Mr. Ruggiero. My name is  
22 Horatio Mihet, and I represent the Plaintiffs in this  
23 lawsuit. And we're here this morning to take your  
24 deposition. We always start with a couple of ground  
25 rules to make sure that we're all on the same page.

1 Okay?

2 A. (The witness nods head).

3 Q. Number one, everything that you and I are going  
4 to be saying today is being transcribed by the court  
5 reporter seated next to us, which is why it's important  
6 for us to speak clearly and one at a time. Is that  
7 okay?

8 A. Uh-huh.

9 Q. Your answer just now leads me to my next ground  
10 rule, which is, in order for the court reporter to  
11 accurately transcribe your testimony, it's important  
12 that you verbalize your answers with a yes or a no or  
13 some other way that you feel appropriate because head  
14 nods or things like uh-huh don't always make it  
15 accurately into the record. Is that okay?

16 A. Yes to both.

17 Q. Great. If you don't understand any one of my  
18 questions, will you ask me to repeat it or rephrase it?

19 A. Yes.

20 Q. And, if you don't ask me to repeat or rephrase a  
21 question but you answer it, can I understand from that  
22 that you understood the question and intended to give  
23 the answer that you did?

24 A. Yes.

25 Q. I don't think we'll be together all that long

Vazzo v. City of Tampa  
Sal Ruggiero

10/30/2018

Page 6

1 today. But, should you need a break at any time, please  
2 let us know; and we'll be sure to accommodate you so  
3 long as there's not a question pending at that time. Is  
4 that okay?

5 A. Yes.

6 Q. Great. Throughout the deposition today, for  
7 short, I may refer to the City. You'll understand I'm  
8 talking about the City of Tampa?

9 A. Yes.

10 Q. And I may also refer for short to the ordinance.  
11 You'll understand I'm talking about the ordinance  
12 banning conversion therapy that Tampa has enacted which  
13 is the subject of this lawsuit?

14 A. Yes.

15 Q. And I may also refer today to SOCE for short.  
16 You know that stands for Sexual Orientation Change  
17 Efforts?

18 A. Okay.

19 Q. You know now?

20 A. I know now, yeah.

21 Q. Similarly, GICE stands for Gender Identity Change  
22 Efforts. Is that okay?

23 A. Okay.

24 Q. Great. Have you ever had your deposition taken  
25 before?

Vazzo v. City of Tampa  
Sal Ruggiero

10/30/2018

Page 7

1 A. Yes.

2 Q. In what circumstances? About how many times?

3 A. I spent thirty years as a police officer with the  
4 City of Tampa.

5 Q. Okay. So we'll just say several dozen  
6 depositions?

7 A. Oh, yes. Yes.

8 Q. Okay. What, if anything, did you do to prepare  
9 for today's deposition?

10 A. Well, I met with Rob on Friday --

11 Q. Okay.

12 A. -- for a couple hours. It was mainly a  
13 meeting-me type thing because I never met him before.

14 Q. Okay. And was anyone else present at that  
15 meeting besides you and Rob?

16 A. No.

17 Q. Okay. So --

18 MR. WILLIAMS: "Rob," meaning, Rob Williams,  
19 which is me.

20 MR. MIHET: Of course.

21 BY MR. MIHET:

22 Q. Did you review any documents in preparation for  
23 today's deposition?

24 A. No.

25 Q. Whether at the meeting with Mr. Williams or at

1 anytime after or before?

2 A. No.

3 Q. What is your current position with the City of  
4 Tampa?

5 A. Yeah. I'm the manager for the Neighborhood  
6 Empowerment.

7 Q. And what is Neighborhood Empowerment?

8 A. Neighborhood Empowerment is Code Enforcement;  
9 Neighborhood Enhancement, which is a clean-up operation;  
10 business tax and we have a call center.

11 Q. What does the call center do?

12 A. It takes calls for any clean-up or any code  
13 violation that a citizen might have.

14 Q. Okay. And what does the business tax division  
15 do?

16 A. Business tax collects tax from businesses within  
17 the City of Tampa.

18 Q. Now, you said that. How is Neighborhood  
19 Enhancement different from Code Enforcement?

20 MR. WILLIAMS: Empowerment.

21 MR. MIHET: No.

22 BY MR. MIHET:

23 Q. I think you said there's Code Enforcement?

24 A. Yeah.

25 Q. There's Neighborhood Enhancement. There's

1 business tax, and there's the call center.

2 A. Neighborhood Empowerment is the name of the whole  
3 division.

4 Q. Right.

5 A. Code Enforcement handles living condition issues  
6 and, you know, any kind of work without permits, things  
7 like that. Neighborhood Enhancement is the section that  
8 cleans up right-of-ways and removes debris off streets  
9 and things like that.

10 Q. With respect to Neighborhood Enhancement, you  
11 said it cleans up debris from streets and right-of-ways.  
12 Is Neighborhood Enhancement also involved with issues  
13 that arise on particular private properties? Or is that  
14 Code Enforcement?

15 A. Code Enforcement.

16 Q. Okay. So Neighborhood Enhancement deals with the  
17 public streets and right-of-ways?

18 A. Correct.

19 Q. Okay. How long have you been the manager for  
20 Neighborhood Empowerment?

21 A. Coming up on five years.

22 Q. So you started sometime in 2013?

23 A. Correct.

24 Q. And is that an appointed, an elected position?  
25 How did you get to be the manager there?

1 A. I was appointed.

2 Q. Appointed. By whom?

3 A. The mayor.

4 Q. Who is the mayor that appointed you?

5 A. Buckhorn.

6 Q. Did you have to be approved by a legislative  
7 body, or was it just a mayor appointing you --

8 A. Mayor --

9 Q. -- sufficient?

10 A. -- appointing.

11 Q. Were you appointed for a particular finite term,  
12 or is it an indefinite appointment?

13 A. Indefinite.

14 Q. Okay. Are there any plans for you to leave this  
15 position anytime in the foreseeable future?

16 A. No.

17 Q. Okay. Did you have a position with the City of  
18 Tampa prior to being its manager for Neighborhood  
19 Empowerment?

20 A. Yes. Well, I actually retired from the Tampa  
21 Police as a police commander major in 2011.

22 Q. And how long were you working for Tampa Police?

23 A. Thirty years.

24 Q. Okay. Can you briefly tell me your educational  
25 background, not starting with first grade, but say

1 after -- after high school.

2 A. Yeah. So I have a bachelor's degree in  
3 administration of justice, and I hold a master's degree  
4 in organizational management. And I'm also certified as  
5 a professional in -- just drew a blank. In -- you know,  
6 employee relations, that type of thing.

7 Q. Like, human resources?

8 A. Human resources. That's the word I was looking  
9 for. Yeah, certified as a professional in human  
10 resources.

11 Q. Okay. Do you hold any other professional  
12 certifications besides human resources?

13 A. No.

14 Q. Do you hold any licensing in counseling or the  
15 mental health field?

16 A. No.

17 Q. Have you had any training in the counseling or  
18 mental health field?

19 A. No.

20 Q. Have you had any prior experience with -- I'll  
21 call them LGBT issues, for lack of a better word, prior  
22 to this particular ordinance?

23 A. No.

24 Q. Advocacy in that field or perhaps part of kind of  
25 a lawsuit, anything like that?

Vazzo v. City of Tampa  
Sal Ruggiero

10/30/2018

Page 12

1 A. Nothing.

2 Q. Okay. Did you have any interaction or dealing  
3 with the field of conversion therapy prior to this  
4 ordinance?

5 A. No.

6 Q. Were you involved at all in the consideration and  
7 the debate of the ordinance prior to it being enacted?

8 A. No.

9 Q. No one solicited your input or your thoughts on,  
10 say, enforcement issues relating to the ordinance?

11 A. No.

12 Q. Was anyone in your department involved in the  
13 consideration or debate of the ordinance prior to its  
14 enactment?

15 A. Not to my knowledge.

16 Q. Okay. When did you first learn that your  
17 department was going to be entrusted with enforcement of  
18 the ordinance?

19 A. After it passed.

20 Q. And how did you learn that?

21 A. I was told by the legal department.

22 Q. Okay. And was that during a formal meeting? Was  
23 it a phone call? Do you recall how that came about?

24 A. It might have been -- I think, when I had to  
25 appear at City Council on another matter --

1 Q. Okay.

2 A. -- one of the attorneys told me that we would be  
3 enforcing it.

4 Q. Tell me about that discussion.

5 A. You're going to be enforcing this ordinance.

6 Q. Okay. And you said?

7 A. Okay.

8 Q. Okay. All right. Was there any discussion at  
9 that point about any particular issues that might arise  
10 with respect to enforcement of the ordinance?

11 A. Not at that time, no.

12 Q. Tell me about the -- well, let me ask you this.  
13 Is enforcement of the ordinance, does that go underneath  
14 the Code Enforcement division; or does it go under the  
15 Neighborhood Enhancement division?

16 A. It would be under Code Enforcement.

17 Q. Code Enforcement.

18 And so, tell me a little bit about the Code  
19 Enforcement division. Is it appropriate to call it a  
20 division? Is it a department? What's the --

21 A. It's fine. The way you're referring to it is  
22 fine.

23 Q. Tell me a little bit about the Code Enforcement  
24 division in terms of how it's set up, the leadership  
25 structure --

1 A. Yeah.

2 Q. -- who works for the division.

3 A. Yeah. So I'm the manager.

4 Q. Okay.

5 A. And then, under me, I have six supervisors. And  
6 those six supervisors have a team that's made up of Code  
7 Enforcement and Neighborhood Enhancement. So they each  
8 have about ten or twelve workers that we supervise. And  
9 then, under the supervisors, there's three assistants  
10 that we call senior inspectors. And they help out  
11 with -- you know, with the supervisor managing these  
12 teams. And then they're -- they take over when the  
13 supervisor is maybe on vacation or out sick.

14 Q. Okay. So you have the manager, you --

15 A. Uh-huh.

16 Q. -- sitting on top?

17 A. Yes.

18 Q. Under you, you've got six supervisors?

19 A. Correct.

20 Q. And, under them, you have three senior  
21 inspectors?

22 A. Correct.

23 Q. And then you have six teams of ten to twelve  
24 enforcers each?

25 A. Not -- well, it's a combination of enforcers and

1 clean-up.

2 Q. Okay.

3 A. That's the enhancement.

4 Q. There are distinct individuals that perform  
5 enforcing responsibilities, and others that perform  
6 clean-up --

7 A. Yes.

8 Q. -- responsibilities?

9 And about how -- how is a team broken down? Is  
10 it about half and half enforcers versus clean-up? Or...

11 A. On the east side of the City, there's more than  
12 would be in South Tampa because of the call load, you  
13 know, the clean-up and all that.

14 Q. Yeah.

15 A. Depending on the workload. So East Tampa might  
16 have a little bit more than South Tampa, maybe one or  
17 two; but they're pretty close.

18 Q. Are there positions and duties interchangeable?  
19 Can somebody today be part of the clean-up team and --  
20 and then tomorrow or next week switch over to being an  
21 enforcer? Or are they clearly-delineated roles with --

22 A. Right. The first scenario? No, that wouldn't  
23 be.

24 Q. Okay. They're clearly delineated --

25 A. Yes.

Vazzo v. City of Tampa  
Sal Ruggiero

10/30/2018

Page 16

1 Q. -- roles?

2 A. Yes, sir.

3 Q. And the enforcers do just enforcement, and the  
4 clean-up guys do just clean-up?

5 A. Yes.

6 Q. And the clean-up guys then would not have any  
7 responsibilities for enforcing this particular ordinance  
8 we're talking about?

9 A. Or any ordinance, correct.

10 Q. Okay. So approximately how many code enforcers  
11 are there that work for the City? If you've got six  
12 teams --

13 A. Uhm.

14 Q. -- and you have maybe a half a dozen each; is  
15 that fair?

16 MR. WILLIAMS: Let him finish his question.

17 THE WITNESS: Yeah.

18 BY MR. MIHET:

19 Q. What does the math work out to?

20 A. Forty, forty-five citywide, somewhere around  
21 there.

22 Q. Okay. Are the three senior inspectors themselves  
23 assigned to these teams, or are they sort of sitting on  
24 top of the teams --

25 A. They're -- they're --

1 Q. -- organizationally speaking?

2 A. -- above the team. Yeah. They kind of -- you  
3 know, like I said, they're -- they help out with the  
4 supervision of the work.

5 Q. Okay. What are your responsibilities within the  
6 code enforcement division?

7 A. So, you know, I oversee the whole operation. I  
8 have to make sure that, you know, all the work is  
9 getting done, that they're following up on complaints  
10 and, you know, we're making sure that people are living  
11 safe out here. If there's any clean-up issues, I have  
12 to, you know, make sure that's being addressed. I  
13 oversee, you know -- the supervisory -- like, the  
14 business tax supervisor, if there's an issue, he'll come  
15 to me; and we'll hash out whatever might happen. The  
16 call center might have a problem with something.  
17 They'll come to me and -- you know, so, overall, I  
18 basically oversee the day-to-day operations of the whole  
19 division.

20 Q. Okay. And who do you report to?

21 A. Jake Slater.

22 Q. Who is he?

23 A. He's an administrator.

24 Q. Is that his title?

25 A. Correct.

Vazzo v. City of Tampa  
Sal Ruggiero

10/30/2018

Page 18

1 Q. City administrator?

2 A. He's -- yes. Yes, sir.

3 Q. And who does Mr. Slater report to?

4 A. Bob Buckhorn, the mayor.

5 Q. What is the educational requirement for the City  
6 of Tampa code enforcers?

7 A. High school.

8 Q. High school diploma or its equivalent, like, a  
9 GED?

10 A. Correct. Yes, sir.

11 Q. Okay. Are they required to hold any professional  
12 certifications or licenses?

13 A. Yeah, they have to be certified.

14 Q. As what?

15 A. As a certified code inspector. They take a --  
16 you know, they read a book; and then they take an exam.

17 Q. Generally, what's the subject matter that the  
18 book and the exam cover?

19 A. Yeah. So it would be, like, anything that has to  
20 do with construction of a building or living conditions.  
21 And then they get into some, you know, legal, you know,  
22 search and seizure, that type of thing. Not -- not a  
23 lot on that. Mainly, the crux of the exam is basically  
24 on buildings, what to look for, you know, structure  
25 damage and things like that.

1 Q. Okay. What about, like, grass that's too tall,  
2 things of those --

3 A. Well, see, that exam just covers what I just  
4 said.

5 Q. Okay.

6 A. Most -- yeah. It doesn't cover the grass and all  
7 that.

8 Q. Okay.

9 A. They get that on the job.

10 Q. On-the-job training?

11 A. Yes.

12 Q. Okay. Other than the code inspector's  
13 certification, are the code enforcers required to hold  
14 any other professional licensing or certification?

15 A. No, that's it.

16 Q. Okay. Does the educational or licensing  
17 requirement differ for the three senior inspectors? Are  
18 they required to have additional education or  
19 certification beyond what we just talked about for the  
20 regular code enforcers?

21 A. No.

22 Q. And so what about the six supervisors?

23 A. No.

24 Q. Okay. So, to be a code enforcer in the City of  
25 Tampa, including a senior inspector or a supervisor, all

1 you need is a high school diploma or the equivalent and  
2 the code inspector certification?

3 A. Correct.

4 Q. Okay. And, just for clarity, from now on when I  
5 refer to a code enforcer, I mean to include the three  
6 senior inspectors and the six supervisors in that  
7 umbrella unless I say otherwise. Okay?

8 A. Understood.

9 Q. Have the City of Tampa code enforcers received  
10 any training on any mental health issues?

11 A. No.

12 Q. Have the code enforcers of the City of Tampa  
13 received any training on any issues that might arise in  
14 family therapy?

15 A. No.

16 Q. Have they received any training with respect to  
17 any issues that might arise in the context of  
18 counseling?

19 A. No.

20 Q. Okay. And, if I asked the same questions for  
21 yourself, would the answer be no, as well?

22 A. Yeah. Correct.

23 Q. You haven't had any training in those fields  
24 either?

25 A. No.

1 Q. Okay.

2 MR. WILLIAMS: Harry, just so I'm clear on  
3 the line of questioning, you're talking about training  
4 that emanates from the City of Tampa as opposed to what  
5 someone might obtain on his or her own account? Unless  
6 he questioned all of them, he wouldn't know that, of  
7 course.

8 MR. MIHET: Of course.

9 BY MR. MIHET:

10 Q. But I think you understood my question?

11 A. Yeah. I'm answering based on what the City might  
12 provide.

13 Q. Right. The City hasn't provided any of those  
14 trainings?

15 A. No.

16 Q. And the City is not aware of any individual code  
17 enforcer going out and getting this kind of training on  
18 their own?

19 A. I can answer for myself.

20 Q. Okay.

21 A. And the answer would be, no, I don't know.

22 Q. You, as the manager, as the head of the  
23 department, don't know of any such training?

24 A. Correct.

25 Q. Okay. Certainly, the City hasn't required the

1 code enforcers to go out and obtain this kind of  
2 training from someone else?

3 A. They have not.

4 Q. Okay. Have the code enforcers, including  
5 yourself and the supervisors and the senior inspectors,  
6 received any training on how to investigate complaints  
7 that might arise under this ordinance, the conversion  
8 therapy ordinance?

9 A. Yes.

10 Q. What kind of training have they received?

11 A. Now, I'm going to take myself out of it because I  
12 didn't attend. Okay?

13 Q. Okay.

14 A. When this passed, I think it was in April of  
15 2017, I directed our legal adviser at that time to  
16 develop something. But it was some time that passed by.  
17 It didn't happen right away.

18 Q. Okay.

19 A. So, in August of 2017, he -- he trained the  
20 troops on --

21 Q. Enforcement?

22 A. -- the ordinance and how we're going to enforce  
23 it.

24 Q. Okay. Who are we talking about? Who --

25 A. Jerrod Simpson.

1 Q. And Mr. Simpson is -- what's his function, his  
2 title?

3 A. He is an assistant city attorney.

4 Q. Okay. And why did you ask him to provide this  
5 training?

6 A. I wanted the division to be prepared in case we  
7 did get a complaint --

8 Q. Okay.

9 A. -- on, you know, how to handle the situation.  
10 And the bottom line is, if we do get a complaint,  
11 everything is going to get run through the legal  
12 department before we -- you know, before we make any  
13 steps on anything.

14 Q. I take it that's how the City -- how the Code  
15 Enforcement department operates with every other  
16 complaint? They run it through the legal department?

17 A. Quite a bit. I mean, you know, if it's tall  
18 grass or things like that. But, if it starts to get a  
19 little complicated, we always bring the legal department  
20 involved.

21 MR. WILLIAMS: Harry, for your information,  
22 Mr. Simpson is one of our 30(b)(6) witnesses; and he  
23 will be here tomorrow, of course.

24 MR. MIHET: Okay.

25 BY MR. MIHET:

1 Q. So what kinds of matters do you typically run  
2 through the legal department? You said if it gets a  
3 little complicated. Give me an idea.

4 A. Well, if we have a house that may -- you know,  
5 may be a candidate for demolition but there's a  
6 foreclosure going on, we bring them in -- we get them  
7 involved in that. There's been other issues where we've  
8 had fencing around a property with a gate lock. You  
9 know, get advice on that. You know, just things like  
10 that.

11 Q. Okay.

12 A. Sometimes we may need a letter sent to somebody  
13 in response to something, and they'll do that.

14 Q. Okay.

15 A. You know, stuff like that.

16 Q. And why is it that complaints under this  
17 ordinance would be routed through to the legal  
18 department?

19 A. Well, number one, this is a situation where the  
20 code investigators, they're not -- they don't handle  
21 this type of thing. The legal department would be the  
22 ones that would -- if it went to prosecution, you know,  
23 they would oversee it. So we would get them involved to  
24 see, you know, number one, do we have a complaint here?  
25 Does it meet any -- any probable cause under the

1 ordinance? Any other questions that we might have to  
2 get involved in, things that he would have -- he could  
3 answer that when he comes. But just things that he  
4 would have to prove if there was going to be a case  
5 made --

6 Q. Okay.

7 A. -- that type of thing.

8 Q. Whose responsibility is it under the -- the City  
9 code to issue a notice of a violation when there is a  
10 Code Enforcement violation?

11 A. Oh, it's us. Yeah, it would be my folks.

12 Q. Is that terminology appropriate? Is it a notice  
13 of violation or a citation? What is issued when a  
14 violation --

15 A. Usually, a --

16 Q. -- is detected?

17 A. Yeah. So, usually -- like the example of  
18 overgrowth?

19 Q. Yep.

20 A. We would issue a letter saying that you have  
21 twenty-one days to cut your grass or -- you know, or  
22 further action will be taken.

23 Q. What is the further action in that situation?

24 A. Well, that situation there would be -- it would  
25 be a reinspection. And then, if it didn't -- they

1 didn't cut the grass, they would get a ticket.

2 Q. Okay. A ticket?

3 A. A ticket, yes.

4 Q. And the ticket then would start the -- the  
5 process of them having to come in and either pay the  
6 ticket or -- or do what?

7 A. Or challenge it.

8 Q. Okay. Challenge it where?

9 A. Through -- through the court system.

10 Q. Okay. A special magistrate or...

11 A. The tickets go to Hillsborough County.

12 Q. Okay. Are there special magistrates that are  
13 used as part of the Code Enforcement process?

14 A. Yes.

15 Q. In what cases?

16 A. Any type of, like, building violation, like, your  
17 house needs to be painted or, you know, you have  
18 accumulations on your property, things like that. That  
19 can go -- that can go to the magistrate. Any zoning  
20 case goes to the magistrate.

21 Q. So, if tickets go to the court, what -- what is  
22 issued in a case that goes to the magistrate? Is  
23 that --

24 A. Just a court date.

25 Q. Okay.

1 A. Yeah.

2 Q. It's like a notice of violation --

3 A. (The witness nods head).

4 Q. -- or a letter or --

5 A. It's a letter saying that, since you did not, you  
6 know, correct the problem --

7 Q. Okay.

8 A. -- you need to appear on such and such a date in  
9 front of the magistrate.

10 Q. Okay. And, in both of those instances, whether  
11 it's the notice with the court date or the ticket being  
12 issued, whose duty is it to -- to determine that a  
13 violation has taken place and a notice or a ticket has  
14 to be issued?

15 A. It would be the inspector, yeah.

16 Q. The code enforcement official?

17 A. Correct.

18 Q. Okay. And, with respect to enforcement under the  
19 conversion therapy ordinance, is it -- is it also the  
20 case that it's the code inspector that has to determine  
21 whether a violation has taken place and issue a ticket  
22 or a notice?

23 A. Ultimately.

24 Q. Okay. When you say, "ultimately," what do you  
25 mean?

1 A. Because we're going to review it with the legal  
2 department first.

3 Q. Okay.

4 A. But we haven't had a case to review, so I really  
5 can't comment.

6 Q. Sure. So the Code Enforcement official receives  
7 a complaint. You say they're going to review it with  
8 the legal department. And then, based on that review,  
9 the Code Enforcement official decides whether a notice  
10 of a violation or a ticket has to be issued?

11 A. Well, in that scenario you just, you know,  
12 detailed --

13 Q. Yeah.

14 A. -- I would say that they're going to be on the  
15 same page, the legal department and the -- and the  
16 investigator.

17 Q. Why would you say that?

18 A. Well, because they're going to work in  
19 conjunction on that case.

20 Q. Okay. But the ultimate decision belongs with the  
21 Code Enforcement person under the code, right?

22 A. Under this particular -- and you can ask  
23 Jerrod Simpson. Okay? The decision has been made that  
24 they will review. And, to me, that means they're going  
25 to direct how the investigation is going to go.

1 Q. "They," being the legal department?

2 A. Correct.

3 Q. So you believe that, with respect to enforcement  
4 of the ordinance, the ultimate calls are going to be  
5 made in the legal department, not by Code Enforcement?

6 A. I think that it's going to be a common -- they're  
7 going to direct our investigator on how to proceed.

8 Q. And the investigator is going to listen to that  
9 direction in every instance?

10 A. Yeah.

11 Q. Okay. And in what other instances within the  
12 Code Enforcement process does that same thing happen,  
13 the decision is made by the legal department as opposed  
14 to the Code Enforcement person?

15 MR. WILLIAMS: Before you answer.

16 THE WITNESS: Yes.

17 MR. WILLIAMS: Will you read that question  
18 back for me, please.

19 (Requested portion read back by the court reporter)

20 BY MR. MIHET:

21 Q. And by, "the decision," I mean, the decision as  
22 to whether or not a violation has occurred such that a  
23 ticket or a notice must be issued.

24 MR. WILLIAMS: Harry, I'm going to object to  
25 the form of that question because I'm not sure that was

1 the import of his answer. But my objection is on the  
2 record.

3 So please go ahead, if you understand it.

4 THE WITNESS: Okay. So you're asking if  
5 legal has ever given our folks advice on how to proceed  
6 on a case?

7 MR. MIHET: Well, not necessarily advice.

8 BY MR. MIHET:

9 Q. The way I understood you to be testifying -- and  
10 correct me if I misunderstood it. But I understood you  
11 to say, with respect to the ordinance, legal would be  
12 making the determinations. They would be instructing  
13 the code enforcers whether or not a notice or a ticket  
14 has to be issued; and the code enforcers would listen to  
15 legal, correct?

16 A. Correct, yes.

17 Q. So my question is: In what other instances does  
18 that scenario happen besides this conversion therapy  
19 ordinance?

20 A. Yeah. So -- I mean, I can't give you an exact,  
21 you know -- you know, like, a date or something. But  
22 it's happened where we may go to them and say -- I'm  
23 trying to think of one recently. We may go to them or  
24 the inspector might go to them or the supervisor and  
25 say, hey look, we have this situation, we can either go

1 take them to Hillsborough County Court or take this case  
2 to the magistrate, that type of thing.

3 Q. Okay.

4 A. And they may look at the facts and circumstances  
5 and decide, well, we think this belongs in the  
6 magistrate. So then that's where we bring it. So  
7 there's other instances where they -- where they  
8 directed us to, you know, take it somewhere else; and  
9 we've done it. Or, you know, like, there's been a  
10 couple other cases where they'll -- you know, where  
11 they'll direct us on, you know, how to enter a property,  
12 things like that --

13 Q. Okay.

14 A. -- you know? There's been other directions. And  
15 we're not going to argue with them on it. You know,  
16 they're the prosecution of these cases. If Jerrod  
17 Simpson or whoever is in that prosecutorial job, he  
18 says, hey, we need it to go this way or gather this  
19 evidence, we're going to do it. You know? That's the  
20 way you build a case.

21 Q. Sure. They get to prosecute a case after the  
22 Code Enforcement officials write the ticket or issue the  
23 violation notice?

24 A. Or they can -- sometimes we jump -- they jump in.  
25 We get them to come in before anything is issued, you

1 know, to kind of get some guidance there.

2 Q. Okay. So I guess that's what I'm trying to get  
3 at because the examples you gave me dealt with -- with  
4 matters of strategy or procedure, whether to go to one  
5 court or another. You know?

6 What I'm -- what I'm asking is, with respect to  
7 that initial determination of whether or not a violation  
8 has occurred and whether or not a ticket or a notice of  
9 the violation should be issued, in what other instances  
10 are those calls made by the people in the legal  
11 department as opposed to the code enforcers?

12 A. I mean, I would say not a lot.

13 Q. Okay.

14 A. That would be my answer.

15 Q. Okay.

16 A. You know?

17 Q. So has it ever happened?

18 A. Where they've directed us to proceed a certain  
19 way?

20 Q. Yeah, to say, hey, there is a violation there.  
21 You need to go issue a -- a citation.

22 A. No, no. They're not -- they're not out there on  
23 the street looking for violations. Okay? So we can  
24 take, you know, that answer -- they're not out there  
25 doing that.

1 Q. Okay.

2 A. Most of the time it's us going to them.

3 Q. Okay. And has it ever happened where -- where a  
4 Code Enforcement official said, you know what, I've  
5 looked at this particular situation, I've looked at the  
6 grass on this property, I don't think it's too tall and  
7 somebody in the legal department say, well, no,  
8 actually, that is too tall, it is a violation of our  
9 code, you need to go out and issue a citation for that?

10 A. No.

11 Q. Okay.

12 A. No. That example -- no, I don't have any  
13 examples like that.

14 Q. Okay. Can you think of any examples where the  
15 initial decision of whether or not a violation has taken  
16 place is made by someone in the legal department as  
17 opposed to a Code Enforcement official?

18 A. No. Most of the time, it's -- we have a  
19 situation, you know, we want some guidance. And -- you  
20 know? And then that's when we go to them. But, for  
21 them to be out there looking for violations or that type  
22 of thing, no.

23 Q. Okay. What if someone were to make a complaint  
24 directly to the legal department, what would happen in  
25 that situation?

1 MR. WILLIAMS: You're talking about any  
2 infraction?

3 MR. MIHET: Yep.

4 THE WITNESS: Well, it would -- they  
5 probably would call me and say, hey look, we've got this  
6 complaint. Can you look into it? And then I would  
7 assign it to the appropriate supervisor, and then it  
8 would work its way down from there.

9 BY MR. MIHET:

10 Q. Okay. What did this training that Mr. Simpson  
11 provided in August 2017 for the Code Enforcement  
12 officials consist of?

13 A. Basically, an overview of the ordinance and then  
14 basically the determination that, if we do get a case,  
15 bring it to the legal department first.

16 Q. Anything else that was covered at this training?

17 A. That's -- you'd have to ask him. I wasn't  
18 present at the training.

19 Q. Okay. Why were you not present at the training?

20 A. I don't know. I might have had something else to  
21 do. Could have been -- I don't know.

22 Q. Were there any written materials distributed at  
23 the training?

24 A. Not that I know of.

25 Q. Okay. Was the training recorded in any fashion?

1 Audio? Video? Transcribed?

2 A. PowerPoint.

3 Q. Was there a PowerPoint?

4 A. Yeah.

5 Q. Okay. Who would have that PowerPoint?

6 A. Jerrod Simpson.

7 Q. Other than the PowerPoint presentation, was there  
8 any recording; audio, video or transcription, of the  
9 session?

10 A. I would say, to my knowledge, no.

11 Q. Okay. Have you ever seen the PowerPoint?

12 A. Yes.

13 Q. When?

14 A. I think I looked at it last week.

15 Q. Okay. And what did the PowerPoint consist of?

16 A. What I previously stated.

17 Q. Okay. Which is the overview of the ordinance and  
18 an instruction that, when a call is received, to bring  
19 it to the legal department?

20 A. Yeah.

21 Q. Did you see anything else in the PowerPoint?

22 A. Not that I recall.

23 Q. Okay. Did you look at the PowerPoint last week  
24 in anticipation of your deposition here today?

25 A. Ah...

1 Q. Well, let me ask you this. Let me try it a  
2 different way.

3 A. Yeah.

4 Q. Why did you look at the PowerPoint presentation  
5 last week?

6 A. I wanted to look and see what date it was  
7 actually done. That was my reasoning. But it didn't  
8 have a date on it.

9 Q. Okay. And was the reason that you were looking  
10 to determine the date because you knew that you would  
11 have to come and testify about it here today?

12 A. No. I just -- I -- it was for my own -- you  
13 know, I just was trying to put things in my mind, like,  
14 when did this thing pass? And then I remember talking  
15 about we need to get some training and then just kind of  
16 get it in my mind.

17 Q. What prompted you to start thinking about that,  
18 if not -- if not knowing that you would be deposed here  
19 today?

20 A. Just -- I don't know. I mean, I wasn't -- you  
21 know, wasn't --

22 Q. Okay.

23 A. -- trying to, you know, prepare for a test or  
24 anything like that. Just wanted to, you know, see what  
25 was done.

1 Q. Okay. Did looking at that PowerPoint help to  
2 refresh your recollection about the date when the  
3 presentation occurred?

4 A. No. I said it didn't.

5 Q. Okay.

6 A. It didn't. And I had to --

7 Q. How is it that you know then that it was around  
8 August --

9 A. Because --

10 Q. -- 2017?

11 A. -- I -- when it didn't have a date, I looked -- I  
12 called one of the other supervisors and asked if there  
13 was a sign-in sheet. And, she said, yes, it was  
14 August -- I think it was August 1st.

15 Q. Which supervisor did you speak with about the  
16 sign-in sheet?

17 A. Susan Wenrick.

18 Q. Can you spell that last name?

19 A. Yeah. W-e-n-r-i-c-k.

20 Q. And is she one of the six supervisors that we  
21 were talking about earlier?

22 A. Yes.

23 Q. Okay. And what is it that you asked Ms. Wenrick?

24 A. About a sign-in sheet for that particular day.

25 Q. And why were you asking her about a sign-in

1 sheet?

2 A. I just wanted to get in my mind what day this all  
3 occurred.

4 Q. Okay. And did she provide you with a sign-in  
5 sheet?

6 A. She told me the date.

7 Q. Okay. She looked at a sign-in sheet?

8 A. Yeah. She has a sign-in sheet, correct.

9 Q. And she told you the date?

10 A. Correct.

11 Q. And what was the date that she gave you?

12 A. I think it was August 1st of 2017.

13 Q. Was Ms. Wenrick present at this training?

14 A. Yes.

15 Q. And would the sign-in sheet have the names of all  
16 the people who were present?

17 A. Yes.

18 Q. And, generally, who were the people that were  
19 present there?

20 A. You'd have to see the sheet. But, you know, it  
21 would probably be the inspectors and the supervisors and  
22 the seniors.

23 Q. Okay.

24 A. Whoever -- unless somebody was on vacation or  
25 something.

1 MR. MIHET: Let me just ask your attorney.

2 Mr. Williams, was the PowerPoint  
3 presentation and the sign-in sheet produced to us?

4 MR. WILLIAMS: No, because that was not  
5 possessed or in the custody of any of the twenty  
6 custodians that Magistrate Judge Sansone had in her  
7 order. That's the answer. As I told Roger yesterday,  
8 as you know, we've had several hearings on that. And  
9 we've tried to comply with her order as best we can.  
10 And Mr. Simpson is not on that list. Mr. Jerrod's not  
11 on that list. Ms. Wenrick's not on that list. And  
12 the -- I think the best way to put it, Harry, is that,  
13 because the Court was very specific, we had to try to  
14 comply with this.

15 Now, having said that, I'll be happy to  
16 consider and consult with the City as to whether they're  
17 willing to produce that sign-in sheet, if you want it,  
18 and the power slide presentation.

19 MR. MIHET: Okay.

20 MR. WILLIAMS: To me, it's innocuous. To  
21 you, it may not be. I mean, if you're going into this  
22 in some detail, I'm not sure why. I mean, I can  
23 speculate; but that's neither here nor there. I will  
24 certainly inquire of that, and maybe we can deal with  
25 Mr. Simpson tomorrow.

1 MR. MIHET: Okay. Well, you know, just for  
2 the record --

3 MR. WILLIAMS: That's the answer to your  
4 specific question.

5 MR. MIHET: Great. You know, just for the  
6 record, Mr. Ruggiero's name is among the list of twenty  
7 custodians.

8 MR. WILLIAMS: Yeah. But he doesn't have a  
9 copy of that.

10 MR. MIHET: It's certainly within his  
11 custody, possession or control, is it not?

12 MR. WILLIAMS: No, not -- not the slide  
13 presentation.

14 MR. MIHET: Okay.

15 MR. WILLIAMS: No. He doesn't have it.

16 MR. MIHET: Well, he just testified he  
17 looked at it last week.

18 MR. WILLIAMS: But he -- he didn't look at  
19 it prior to December 15, which is the cutoff date. So  
20 I'm taking the Court's order literally. Okay?

21 BY MR. MIHET:

22 Q. So, Mr. Ruggiero, do you have a copy of this  
23 PowerPoint presentation available to you?

24 A. Yeah. I have it on e-mail.

25 Q. And you had it last week?

1 A. Correct.

2 Q. And who sent the e-mail that you have it on?

3 A. Susan Wenrick.

4 Q. Okay. And when was that e-mail sent to you?

5 A. I think it was Friday.

6 Q. Is Ms. Wenrick a member of the Code Enforcement  
7 division then?

8 A. Yes.

9 MR. MIHET: Okay. So, Mr. Williams,  
10 obviously, we would -- we would argue that both of those  
11 documents are relevant; and they should have been  
12 produced. We'd ask you to let us know as early as  
13 possible today whether or not you'd be willing to  
14 produce them without us going back to the court. We  
15 believe that we are and will be further prejudiced by  
16 having to question these witnesses without the benefit  
17 of those two documents. So I'm hoping we could resolve  
18 the issue by you voluntarily providing them to us this  
19 afternoon. But, you know, if not, then we'll do what we  
20 need to do.

21 MR. WILLIAMS: Here's my position on that  
22 question. I disagree with you that they -- we were --  
23 the City was obligated to produce those documents. We  
24 are trying to comply with the Court's order, and we are  
25 reading the Court's order as I articulated earlier.



1 previously to counsel two documents. One is a  
2 handwritten sign-in sheet which is entitled CSC -- I  
3 guess that's one p.m. meeting with legal, August 1, '17,  
4 that has the signatures of a number of people who  
5 apparently were at that meeting. And I also handed a  
6 Code Enforcement Update authored by Jerrod Simpson,  
7 Assistant City Attorney, to counsel.

8 In accordance with my prior comments, let me  
9 formalize my comments. These two documents, as far as  
10 the City is concerned, did not come within the ambit of  
11 Magistrate Judge Sansone's order. But their existence  
12 came up during the course of Mr. Ruggiero's testimony.  
13 And the City, based on my recommendation, has agreed to  
14 nevertheless produce these documents so that we can have  
15 a more efficient process here; and I have done so.

16 But I want to reiterate, as far as I'm  
17 concerned and the City is concerned, these were not  
18 within the ambit of this Court's order because  
19 Mr. Simpson was not one of the custodians. And  
20 Mr. Ruggiero didn't have a copy of it during the  
21 timeframe that we're talking about, October 1 of '16  
22 through December 15 of '17. With that statement on the  
23 record, let's proceed with the questions and answers.

24 MR. MIHET: Okay. Just for the record, we  
25 just disagree with the City's narrow interpretation and

1 narrow view of its obligation under the Court's various  
2 orders. But we will bring those disagreements up with  
3 the Court at the appropriate time.

4 (Plaintiffs' Exhibit Nos. 1&2 marked for identification)

5 BY MR. MIHET:

6 Q. All right. Mr. Ruggiero, I've handed you what we  
7 have marked as Plaintiffs' Exhibit 1 and Plaintiffs'  
8 Exhibit 2. Take a look at Plaintiffs' Exhibit 1,  
9 please, and let me know is this the sign-in sheet that  
10 you were testifying about prior to the break that is the  
11 sign-in sheet that Ms. Wenrick provided to you with  
12 respect to the training session that Mr. Simpson  
13 conducted for the code enforcers?

14 A. Well, this is the first time I'm seeing this  
15 sheet --

16 Q. Okay.

17 A. -- so... But the date is 8/1 of '17. That was  
18 the date I was given.

19 Q. Okay. So, when you were discussing this sign-in  
20 sheet with Ms. Wenrick, she told you that there was one;  
21 and she told you the date that was on the sheet?

22 A. Yes.

23 Q. And the date that she gave you was August 1st of  
24 2017?

25 A. Correct.

1 Q. And that's the date that appears on this  
2 document, Exhibit 1?

3 A. Yes.

4 Q. So is there any doubt in your mind then that this  
5 document is the sign-in sheet that was taken at the  
6 meeting that you testified about in August 2017 where  
7 Mr. Simpson provided training to the code enforcers with  
8 respect to the ordinance?

9 A. No doubt.

10 Q. Okay. I'm counting twenty-eight signatures on  
11 the first page and eight signatures on the second page  
12 of Exhibit 1. So, if my math serves me right, it's  
13 thirty-six attendees, right?

14 A. Correct.

15 Q. Was this a mandatory meeting for the code  
16 enforcers?

17 A. Yes.

18 Q. And so I think you testified earlier that there  
19 were between forty and forty-five enforcers. Is it fair  
20 to say that some of them then did not -- were not able  
21 to attend this meeting?

22 A. Yes.

23 Q. Was there any kind of a make-up session for them  
24 or a requirement for them to fulfill -- to obtain this  
25 training some other way?

1 A. No.

2 Q. Okay. When you take a look at the names on this  
3 sheet, these are part of the forty or forty-five code  
4 enforcers that the City of Tampa has?

5 A. Yes.

6 Q. Is there any name among these thirty-six that you  
7 do not recognize?

8 A. The only one I can't really make out is this  
9 scribble right here.

10 Q. For the record, you're pointing to the eighth  
11 signature from the bottom of the first page; is that  
12 right?

13 A. Correct.

14 Q. Okay. Other than that one entry, is there any  
15 other entry that you cannot recognize?

16 A. Yes, I got -- everybody else is identified.

17 Q. And is everybody else a code enforcer -- well,  
18 let me ask you that a different way. Are there any  
19 names among the thirty-five that you do recognize who  
20 are not code enforcers for the City of Tampa?

21 A. No, they all are. McLeish is now retired,  
22 though. He's on the second page.

23 Q. Okay.

24 A. Second one down from the top.

25 Q. Okay. All the other ones are code enforcers for

1 the City of Tampa?

2 A. Yes.

3 Q. Are you able to tell me whether all six  
4 supervisors and all three senior inspectors were in  
5 attendance? Why don't we just -- as you go down, when  
6 you spot a supervisor or an inspector, tell me; and  
7 we'll identify them. Okay?

8 A. Yeah. So, right at the top, you've got Bowmer,  
9 senior inspector.

10 Q. That's the first entry on the first page?

11 A. Yes.

12 Jerry Williams.

13 Q. Is what?

14 A. He's a supervisor.

15 Q. And that's the second entry on the first page?

16 A. Yes.

17 Carlos Rios, supervisor.

18 Q. Is that -- I see it.

19 A. Right below, Rasmussen.

20 Q. I see it.

21 Carlos Rios is a supervisor.

22 A. Ciucio, he's a senior inspector.

23 Q. And where do you see that name?

24 A. You see Alan Villa?

25 Q. Yep.

1 A. Right below Alan Villa.

2 Q. Jack Ciucio?

3 A. Ciucio.

4 Q. He's a senior inspector?

5 A. Correct.

6 Q. Okay.

7 A. Billie -- Billie J -- Jo Slatton, supervisor.

8 Q. Where do you see that?

9 A. Right at the bottom of the first page.

10 Q. Got it. Supervisor.

11 A. Susan Wenrick, supervisor. And then the last --  
12 the second page, the last name, Randel Smith, that's a  
13 senior inspector.

14 Q. Okay. So I'm counting about four of the six  
15 supervisors and --

16 A. Right.

17 Q. -- and three -- all three senior inspectors. Is  
18 that about right?

19 A. Correct.

20 Q. Can you tell which two supervisors were not in  
21 attendance?

22 A. Right. Mike Peterson. Let me just double check  
23 here. The other one would be Kevin Amos.

24 Q. Do you know why either one of those gentlemen did  
25 not attend?

1 A. No.

2 Q. Okay. Looking at Exhibit 2, is this the  
3 PowerPoint presentation that you testified about earlier  
4 which is the one that you looked at last week from the  
5 presentation that Mr. Simpson provided to the code  
6 enforcers regarding the ordinance?

7 A. So the only part that I looked at was in the --  
8 like, in the middle here.

9 Q. Okay.

10 A. That was it.

11 Q. For the record, you are pointing to a page that  
12 has -- within Plaintiffs' Exhibit 2 that has Conversion  
13 Therapy as a title at the top. And then the next entry  
14 says, what is the violation, question mark. Do you see  
15 that? That's what you're pointing to?

16 A. Correct.

17 Q. Okay.

18 A. Yes. And then the second page --

19 Q. And then the next page, same title, Conversion  
20 Therapy with the subtitle, how is it enforced, correct?

21 A. Correct. And then this page here.

22 Q. And then the next page is the same title,  
23 Conversion Therapy; and it's got an entry that says, all  
24 possible conversion therapy cases must be referred to  
25 legal for review, dash, prior to the issuance of a

1 notice of violation. Those are the three pages you  
2 looked at?

3 A. Yes.

4 Q. Are those the only three pages you looked at?

5 A. Yes.

6 Q. But, to get to those three pages, you had to open  
7 up a PowerPoint presentation, right?

8 A. The PowerPoint that I opened up only had those  
9 three pages on it.

10 Q. Oh, it did?

11 A. Yeah.

12 Q. Okay. Where did the PowerPoint come from that  
13 you opened up?

14 A. I think I answered earlier. Susan Wenrick sent  
15 me an e-mail.

16 Q. Okay. There were only three slides in that  
17 PowerPoint?

18 A. To the best of my knowledge, correct.

19 Q. Okay. Do you still have that e-mail in your  
20 in-box?

21 A. I could look.

22 Q. Okay. Do you have a mobile device that you can  
23 look on?

24 A. Yes.

25 MR. MIHET: Why don't we go off the record.

Vazzo v. City of Tampa  
Sal Ruggiero

10/30/2018

Page 51

1 What I'd like to know is --

2 THE COURT REPORTER: Are we still on the  
3 record?

4 MR. MIHET: Yes.

5 BY MR. MIHET:

6 Q. Just so you know, what I'd like for you to try to  
7 determine, if you can, is to what extent that document  
8 was different -- the document that you received by  
9 e-mail was different from this Plaintiffs' Exhibit 2.  
10 Okay? We're going to go off the record and give you a  
11 chance to do that.

12 MR. WILLIAMS: And that's okay, Sal. I  
13 don't want to make a big deal out of this. Let's move  
14 on.

15 (Recess)

16 (Plaintiffs' Exhibit No. 3 marked for identification)

17 MR. WILLIAMS: We're back on the record.

18 During the colloquy between Mr. Mihet and  
19 Mr. Ruggiero prior to this short break, the issue of  
20 whether or not Mr. Ruggiero had seen a portion of the  
21 slide presentation, which is Plaintiffs' Exhibit 2 to  
22 this deposition, that topic came up. In order to  
23 refresh Mr. Ruggiero's deposition, counsel asked him to  
24 look at his iPhone; and he did. And we were able to  
25 print off of the iPhone the portion of the slide show

1 that Mr. Ruggiero apparently had access to a week ago.

2 Now, all of this, as far as I'm concerned,  
3 again, is outside of the parameters of the Court's  
4 order. But, in an effort to move along and make sure  
5 that there's no misunderstanding or difficulty regarding  
6 this, I have made a decision to go ahead and produce  
7 this. We're not going to produce the e-mail, itself,  
8 because that's not relevant. And this is necessary, I  
9 think, for Mr. Ruggiero to refresh his recollection.  
10 And that's the basis upon which I'm producing it. Okay?

11 MR. MIHET: Okay.

12 MR. WILLIAMS: So please proceed.

13 MR. MIHET: So, obviously, we disagree with  
14 just about all of that. But we'll resolve that at  
15 another time.

16 BY MR. MIHET:

17 Q. Mr. Ruggiero, now you've been handed a document  
18 that we have marked as Plaintiffs' Exhibit 3. Is this  
19 the PowerPoint presentation that Ms. Wenrick e-mailed to  
20 you that you reviewed last week regarding the conversion  
21 therapy ordinance training that was provided by  
22 Mr. Simpson to your code enforcers in August of 2017?

23 A. Yeah. That is what I just e-mailed, correct.

24 Q. Okay. And you mentioned that this was provided  
25 to you in an e-mail by Ms. Wenrick?

Vazzo v. City of Tampa  
Sal Ruggiero

10/30/2018

Page 53

1 A. Yes.

2 Q. And when did that e-mail arrive to you?

3 A. Friday.

4 Q. This past Friday?

5 A. Correct.

6 Q. And she was responding to a request that you had  
7 made of her to send this to you or something else?

8 A. No, first part. Yes.

9 Q. You had asked her to send it to you, and she was  
10 responding to that request?

11 A. Yes.

12 Q. Your request to her was conveyed by what means?

13 A. Phone call.

14 Q. So when did that phone call take place?

15 A. Friday.

16 Q. Okay. And so you called her, and you -- you  
17 asked her what exactly?

18 A. I don't remember the exact words.

19 Q. Okay.

20 A. But, obviously, the gist of it was I'd like to  
21 see, you know, what the training was.

22 Q. And did you tell her why you wanted to see it?

23 A. I don't recall.

24 Q. Okay. How long was your conversation with her?

25 A. Maybe a minute.

Vazzo v. City of Tampa  
Sal Ruggiero

10/30/2018

Page 54

1 Q. Okay. What did she say when you told her that  
2 you wanted to see what was provided to your code  
3 enforcers?

4 A. Okay.

5 Q. And she said she would send it to you?

6 A. Yes.

7 Q. Okay. And why was it on Friday that you wanted  
8 to take a look at this?

9 A. No particular reason. You know, I mean, no -- no  
10 particular reason. That would be my answer.

11 Q. Okay. The e-mail message that came from  
12 Ms. Wenrick attaching this presentation, was that the  
13 first message in a string of communication; or was there  
14 another e-mail below that she was responding to?

15 A. I don't know.

16 Q. Okay.

17 A. I don't know.

18 Q. Can you -- can you look and tell me, please.

19 MR. WILLIAMS: Take a look. I don't think  
20 there's --

21 THE WITNESS: I don't --

22 BY MR. MIHET:

23 Q. Do you understand my question?

24 A. Let me pull it up, first.

25 Q. Yeah.

1 MR. WILLIAMS: Harry, I'm allowing this line  
2 of questioning simply to help the witness refresh his  
3 recollection. But I'm not going to get into the  
4 e-mails. They're certainly outside of the boundaries of  
5 the Court's order.

6 THE WITNESS: Okay. What was the question?

7 BY MR. MIHET:

8 Q. The e-mail communication from Ms. Wenrick  
9 attaching this PowerPoint presentation, was it a -- an  
10 original e-mail that she began or a communication that  
11 she began; or was she responding to another e-mail  
12 that's visible in that chain?

13 A. No, I don't -- you have to get specific with me  
14 because -- you know what, I need -- it was actually on  
15 Thursday. I thought it was Friday.

16 Q. That's fine. We can correct that.

17 A. Yeah. I thought it was Friday.

18 Q. That's okay.

19 A. It was actually Thursday.

20 Q. Memories are not always perfect.

21 So, now that you're looking at the e-mail, you  
22 see that it actually took place on Thursday, not Friday?

23 A. Correct.

24 Q. And the date -- Thursday was what? October?

25 A. 25th.

1 Q. 25th of 2018.

2 So really what I'm asking is, you know, when --  
3 when you send an e-mail to somebody, usually you do it  
4 in one or two ways. You can click new e-mail; and you  
5 start an e-mail, right? Or you can reply or respond to  
6 a previous e-mail that had been sent. In that case, you  
7 usually have the previous communication at the bottom  
8 and what it is that you're going to say at the top. Are  
9 you familiar with what I'm talking about?

10 A. Not really. But this is an e-mail from her to me  
11 directly.

12 Q. Okay. And, at the bottom of her e-mail, are  
13 there other previous communications?

14 A. I don't see any.

15 Q. Okay. And did -- in the e-mail that she sent  
16 you, did she say anything about the attachment; or did  
17 she only attach the attachment?

18 A. No. She says, as requested, please see attached  
19 presentation --

20 Q. Okay.

21 A. -- provided to our department by the legal  
22 department.

23 Q. Okay.

24 A. That's it, period.

25 Q. Okay. That's the only thing that she says?

Vazzo v. City of Tampa  
Sal Ruggiero

10/30/2018

Page 57

1 A. Yes.

2 Q. Okay. And did you respond to that e-mail?

3 A. It doesn't look like I did.

4 Q. Okay. All right. Let's work off of Exhibit 3  
5 since this is the one that you -- you saw.

6 A. All right.

7 Q. And so, just so we're clear, Exhibit 3 is what  
8 you looked at last week. Exhibit 2 you hadn't seen  
9 prior to today --

10 A. Correct.

11 Q. -- correct?

12 Now, Exhibit 3 does have more than three pages,  
13 it looks like. I'm counting -- the pages aren't  
14 numbered, but I'm counting approximately ten pages in  
15 this. I think, earlier, you testified that you thought  
16 there were only three pages in the presentation that --  
17 that you looked at. Do you know what -- what the  
18 discrepancy is there?

19 A. Well, it was probably my fault because, to me,  
20 when I look on the iPhone, it looks different than this.

21 Q. I gotcha.

22 A. So that's the discrepancy.

23 Q. Okay.

24 A. So everything that's in this exhibit is on this  
25 e-mail.

1 Q. Is on that e-mail. Okay.

2 So you identified earlier one of the pages that  
3 you looked at which was the one that had the title  
4 Conversion Therapy at the top. It's towards the end of  
5 the document. I believe, for the record, it's the next  
6 to the last page. Do you see that it says Conversion  
7 Therapy at the top; and then it says, all possible  
8 conversion therapy cases must be referred to legal for  
9 review, dash, prior to the issuance of a notice of  
10 violation. Do you see that?

11 A. Yes.

12 Q. That was one of the pages you looked at last  
13 week?

14 A. Yes.

15 Q. Okay. Who is it that came up with this directive  
16 that all possible conversion therapy cases have to be  
17 referred -- must be referred to legal for review prior  
18 to the issuance of a notice of violation?

19 A. I'm trying to remember conversations that you're  
20 asking me, you know, about a year ago. So... I know --  
21 I think we came to an agreement, myself and Simpson,  
22 that this is the way it would be handled.

23 Q. Okay. Now, you had never seen this document  
24 prior to last week --

25 A. Correct.

1 Q. -- correct?

2 And so it's fair to say you didn't write this  
3 directive?

4 A. No.

5 Q. Okay. Do you know who wrote this directive?

6 A. Jerrod Simpson, I'm assuming, wrote it based on  
7 the fact that he prepared the PowerPoint.

8 Q. Okay. And this would have been sometime in 2017  
9 prior to August 1st --

10 A. Correct.

11 Q. -- correct?

12 When did you discuss this issue with him prior to  
13 August 1st of 2017?

14 MR. WILLIAMS: Which issue?

15 MR. MIHET: The issue of the enforcement of  
16 the conversion therapy ordinance.

17 THE WITNESS: I don't know the exact date.  
18 And, I mean, the only thing that I could probably tell  
19 you about that is that it probably happened in our  
20 weekly staff meeting --

21 MR. MIHET: Okay.

22 THE WITNESS: -- at some time after -- after  
23 we found out that it was passed.

24 MR. MIHET: Okay.

25 THE WITNESS: Sometime after that and prior

1 to August 1st, we had some type of discussion.

2 MR. MIHET: Okay.

3 THE WITNESS: I can't tell you exactly what  
4 was said. I don't remember.

5 BY MR. MIHET:

6 Q. Okay. Why was it Mr. Simpson who provided  
7 this -- this training as opposed to someone else in the  
8 legal department?

9 A. He's our -- at the time -- he still is. But, at  
10 the time, he was our direct legal adviser.

11 Q. For the Code Enforcement?

12 A. Correct.

13 Q. Okay.

14 A. He's now -- he's still -- we still have contact  
15 with him because he handles the Hillsborough County  
16 courtroom. Okay? So, at the time, he was our direct  
17 legal adviser; so that's why he prepared it.

18 Q. Okay. What was his involvement in the drafting  
19 or consideration of the ordinance? Do you know?

20 A. You'd have to ask him.

21 Q. Okay. What do you think he means here where he  
22 says, all possible conversion therapy cases must be  
23 referred to legal for review? He puts "all" in all  
24 caps.

25 A. You'd have --

1 MR. WILLIAMS: Object to the form of the  
2 question because it clearly calls for speculation.

3 MR. MIHET: Okay.

4 BY MR. MIHET:

5 Q. Go ahead.

6 MR. WILLIAMS: You're not required to  
7 speculate, but you can answer his question.

8 THE WITNESS: State the question, again.

9 BY MR. MIHET:

10 Q. Why do you believe that this document emphasizes  
11 the word all by putting it in all caps? What does that  
12 convey to you?

13 A. To me, it means all cases.

14 Q. Without exception?

15 A. Correct.

16 Q. Okay. And also another word that is emphasized  
17 is the word prior. It appears in all caps, right?

18 A. Yes.

19 Q. What does that mean to you when it says, prior to  
20 the issuance of a notice of violation?

21 A. Again, all cases.

22 Q. All cases have to be referred prior to when a  
23 notice of violation is issued?

24 A. Yes.

25 Q. Okay. And whose decision was it that all

1 possible cases, without exception, would have to be  
2 referred to legal for review?

3 MR. WILLIAMS: Object to the form.

4 Lack of foundation.

5 You can answer it, if you can.

6 THE WITNESS: Say, again.

7 BY MR. MIHET:

8 Q. Whose decision was it that all possible cases,  
9 without exception, would have to be referred to legal  
10 for review?

11 A. Well, I mean, I'm in agreement with it. So...

12 Q. I understand that.

13 A. That would be my answer. I'm in agreement with  
14 it.

15 Q. Okay. My question is: Where did this directive  
16 originate? In light of the fact that you hadn't seen  
17 this prior to last Thursday --

18 A. All right.

19 Q. -- who came up with this directive? Can we agree  
20 that it wasn't you?

21 A. It wasn't me. It wasn't me that wrote this on  
22 the paper --

23 Q. Okay.

24 A. -- okay? Anything follow-up from that?

25 Q. Yeah. Before this was put on paper, who came up

1 with this directive that all cases would be referred to  
2 legal for review? Do you know?

3 A. I don't recall. You'd have to ask  
4 Jerrod Simpson.

5 Q. Okay. It wasn't you?

6 A. Did I tell him to write this on the paper?

7 Q. Did you tell -- did you call Jerrod up and say,  
8 hey Jerrod, I want to issue a directive that all  
9 possible conversion cases must be referenced to legal  
10 for review, please help me do that? Or words to that  
11 effect.

12 A. I don't recall.

13 Q. Okay.

14 A. I don't recall having a conversation like that.

15 Q. You don't recall ever instructing Jerrod Simpson  
16 or anyone else from the legal department that it was  
17 your decision that all possible conversion therapy cases  
18 must be referred to legal for review?

19 A. I don't recall having that conversation --

20 Q. Okay.

21 A. -- with those -- with those words. I don't  
22 recall it.

23 Q. Do you recall ever making that decision yourself?

24 MR. WILLIAMS: "That decision," meaning  
25 what?

1 MR. MIHET: That all possible conversion  
2 therapy cases must be referred to legal for review prior  
3 to the issuance of a notice of violation.

4 MR. WILLIAMS: Do you understand the  
5 question, Mr. Ruggiero?

6 THE WITNESS: Yeah, I do.

7 MR. MIHET: Okay.

8 THE WITNESS: I just can't -- I don't recall  
9 every conversation that I had. You know, I -- can I  
10 talk to you for a second?

11 MR. MIHET: No.

12 MR. WILLIAMS: No.

13 THE WITNESS: Okay. So here's the thing. I  
14 directed him to conduct training.

15 MR. MIHET: Okay.

16 THE WITNESS: Okay? Like I prior stated.

17 MR. MIHET: Sure.

18 THE WITNESS: I don't recall actually saying  
19 what's on this paper.

20 MR. MIHET: Okay.

21 THE WITNESS: But I don't disagree with it.

22 MR. MIHET: I understand that.

23 BY MR. MIHET:

24 Q. But you don't recall coming up with this  
25 directive and asking him to include it in this

1 presentation, correct?

2 A. No, I did not. No.

3 Q. Okay. So, you know, we talked about this before;  
4 but, now that we know what the actual directive is, can  
5 you tell me any other cases that must be referred to  
6 legal for review prior to the issuance of a notice of  
7 violation?

8 MR. WILLIAMS: I'm going to object to the  
9 form of the question because you continue to use the  
10 word directive. And that's your connotation, not  
11 necessarily an accurate connotation of the slide that  
12 we're looking at.

13 But, with that objection, please answer the  
14 question, Mr. Ruggiero.

15 BY MR. MIHET:

16 Q. Let me -- okay, given that objection, I don't  
17 normally do this; but do you see the word must that  
18 appears in this slide?

19 A. Right. Yes, I do.

20 Q. It says, all possible conversion cases must be  
21 referred to legal for review. Yes?

22 A. I see it, yes.

23 Q. And this was a slide that Mr. Simpson displayed  
24 for your code enforcers to see at this mandatory  
25 training, correct?

1 A. Are you asking that question as I was intendant  
2 -- attending?

3 Q. No. As the head of the department --

4 A. Yeah.

5 Q. -- who -- who testified that this took place and  
6 that this is the PowerPoint presentation that was given,  
7 do you have any reason to doubt that this slide was  
8 shown to your code enforcers at this mandatory training?

9 A. No, I don't doubt it.

10 Q. Okay. And so did your code enforcers -- were  
11 they given any discretion to not refer some cases if  
12 they felt that they weren't appropriate for referral?

13 A. On conversion therapy?

14 Q. Yeah.

15 A. We haven't had a case, so I really can't answer  
16 that.

17 Q. In terms of the instruction, the training that  
18 they received, were they told that they could decide  
19 which cases had to be referred; or were they told that  
20 all of them had to be referred?

21 A. No. It says all.

22 Q. Okay. So was that a -- what would you  
23 characterize this as? An instruction? A training? A  
24 directive? I don't want to put words in your mouth.  
25 But what was -- how would you characterize --

1 A. This slide right here?

2 Q. Yeah.

3 A. This is how we're going to operate on conversion  
4 therapy cases.

5 Q. Okay. Is it an instruction, or is it a  
6 directive? I don't want to put words in your mouth.  
7 What would you characterize this as?

8 A. The way we do business --

9 Q. Okay.

10 A. -- on conversion cases.

11 Q. Is it fair to call it policy? This is going to  
12 be our policy?

13 A. Yes.

14 Q. Okay. So what other cases besides conversion  
15 therapy cases must be referred to legal for review prior  
16 to the issuance of a notice of violation pursuant to  
17 City of Tampa's policy?

18 A. We have inspection warrants. And we get with  
19 them on -- when we're going to do a criminal affidavit  
20 on a -- you know, on a -- if somebody has risen to  
21 the -- where it would go to criminal court, those would  
22 be reviewed by the legal department.

23 Q. Okay. My question is: Prior to the issuance of  
24 a notice of violation, what other cases must be referred  
25 to legal for review?

Vazzo v. City of Tampa  
Sal Ruggiero

10/30/2018

Page 68

1 A. Oh, none.

2 Q. None?

3 A. (The witness nods head).

4 Q. The only cases that must be referred to legal for  
5 review prior to the issuance of a notice of violation  
6 are conversion therapy cases?

7 A. Yes.

8 Q. Why is that?

9 A. Well, I think -- I think you're going to have to  
10 get with the attorney on that. And I think you'll get a  
11 better -- you know, a legal answer out of that.

12 Q. I'm not looking for a legal answer. I'm looking  
13 for the answer of the head of the enforcement  
14 department, which is you, Mr. Ruggiero, right?

15 A. Uh-huh, yes.

16 Q. And you are trusted with enforcing all of the  
17 code provisions of the City of Tampa, correct?

18 A. Not all of the codes.

19 Q. Okay. Well, code enforcement that deals with --

20 A. Housing and zoning and things like that.

21 Q. Okay.

22 A. But we don't enforce every code in the City.

23 Q. And, out of the ones that you're entrusted to  
24 enforce, one and only one has to be referred to the  
25 legal department for review prior to the issuance of a

1 notice of violation.

2 And my question to you is: Why is that?

3 A. Well, I think because, if we ever do get a case  
4 -- and we have never had a case -- I think there's  
5 issues there that -- that, as building code inspectors,  
6 we may not be fully capable of working through without  
7 assistance.

8 Q. Okay. And what kind of issues are you --

9 A. Well, I mean, just one off the top of my head  
10 would be doctor-patient privilege.

11 Q. Okay.

12 A. The other thing is -- is, you know, there may be  
13 child abuse involved. I don't know. There's all kinds  
14 of possibilities. And I think the way this is set up is  
15 the best way to operate.

16 Q. Okay. Your code enforcers are trained to deal  
17 with tangible things they observe, like, the tallness of  
18 the grass or the existence of trash on a particular  
19 property, right?

20 A. Yes.

21 Q. They're not trained to deal with things that are  
22 in the arena of mental health, correct?

23 A. Correct.

24 Q. They're not trained to know whether a particular  
25 mode of therapy is conversion therapy or something else?

1 A. I would -- I would agree.

2 Q. Okay. They're not trained to know whether or not  
3 a child struggling with gender identity confusion has  
4 already reached a point where they embraced the identity  
5 of an opposite sex or whether they're still exploring  
6 it, correct?

7 A. Correct.

8 Q. Somebody with a high school diploma would not be  
9 able to make those determinations?

10 A. I don't know about that. But...

11 MR. WILLIAMS: Yeah. I object to that.  
12 That's an offensive question, as far as I'm concerned.

13 THE WITNESS: Yeah. I mean, they're  
14 hardworking people. I'm going to defend them. These  
15 code inspectors are hardworking --

16 MR. MIHET: Sure.

17 THE WITNESS: -- dedicated people --

18 MR. MIHET: Sure.

19 THE WITNESS: -- that do a good job.

20 BY MR. MIHET:

21 Q. Yeah. And it's no slight on them to say that  
22 there are some things that are going to be outside of  
23 their area of expertise just like they would be out of  
24 mine or out of yours, right?

25 A. I agree.

1 Q. So we don't mean to insult their intelligence.

2 What I'm asking you is: Is someone with a high  
3 school diploma able to determine whether a patient is at  
4 a point where they've already embraced a gender identify  
5 that's different from theirs or whether they're just  
6 exploring their own gender identity?

7 MR. WILLIAMS: I object to the form of the  
8 question as being overbroad and improper hypothetical  
9 and incomplete hypothetical, if it's a hypothetical at  
10 all.

11 You may answer the question, if you can.

12 THE WITNESS: I don't think I can. I don't  
13 have an answer for that.

14 BY MR. MIHET:

15 Q. Okay. Does your Code Enforcement division  
16 enforce any other ordinances with respect to mental  
17 health counselors?

18 A. No.

19 Q. Okay. The only ordinance that you enforce with  
20 respect to mental health counseling is the conversion  
21 therapy ordinance?

22 A. Yes.

23 Q. Does your department enforce any ordinances that  
24 attempt to regulate other modes of therapy besides  
25 conversion therapy?

1 A. No.

2 Q. Conversion therapy is the only mode of therapy  
3 that your department enforces and regulates?

4 A. Yes.

5 Q. Is it fair to say then that your code enforcers  
6 have no experience or expertise in enforcing other  
7 regulations against mental health counselors and mental  
8 health professionals?

9 A. Yes.

10 Q. That's fair?

11 A. Yes.

12 Q. That's accurate? Yes?

13 A. Yes.

14 Q. Okay. Other than this August 1, 2017, training,  
15 have there been any other enforcement guidelines or  
16 memos or training materials provided to you and your  
17 department with respect to enforcement of the ordinance?

18 A. No.

19 Q. Do you know how long was the training? How long  
20 did it last when it took place?

21 A. No. I think you'd have to ask Jerrod Simpson on  
22 that.

23 Q. Okay. Did you ever discuss with Mr. Simpson or  
24 others any concerns that you might have about how the  
25 ordinance -- how the ordinance might be enforced and

1 whether it could be enforced?

2 A. That's why we had this training.

3 Q. Okay.

4 A. You know? Other than that, I wasn't involved in  
5 any conversations as far as the development of this or  
6 the enforcement of it.

7 Q. Have you ever expressed the view that it was not  
8 appropriate to have Code Enforcement officers enforce  
9 the conversion therapy ordinance?

10 A. Have I?

11 Q. Yeah.

12 A. No.

13 Q. Have you ever heard anyone within the City of  
14 Tampa express that view?

15 A. Not that I know of.

16 Q. Has anyone expressed that view to you?

17 A. No.

18 Q. Any of your code enforcers come up to you to say,  
19 Mr. Ruggiero, I don't know how we could possibly enforce  
20 this?

21 A. No. I haven't heard anything like that.

22 Q. None of the supervisors or senior inspectors?

23 A. No, I don't recall any conversations like that.

24 Q. Okay. You're not aware of them taking place  
25 within your department?

1 A. No.

2 Q. So we've obviously seen now the PowerPoint  
3 presentation and the sign-in -- sign-in sheet. What  
4 other documents with regard to the conversion therapy  
5 ordinance have you seen since the ordinance was enacted?

6 A. This is it.

7 Q. Okay.

8 A. Yes.

9 Q. Can't think of any other -- other documents?

10 A. Not -- no, I can't recall anything else.

11 Q. Okay.

12 MR. WILLIAMS: I want to make it clear on  
13 the record that I have, I think, been very flexible in  
14 enabling you to explore this frankly to avoid  
15 unnecessary disagreement. Hopefully, this has  
16 accomplished that. We'll see. But, by allowing you to  
17 explore this, Counsel, I am not waiving the Court's  
18 parameters at all. I'm trying to avoid, as I said,  
19 unnecessary disagreements.

20 MR. MIHET: How is that different from what  
21 you've already said two or three times on the record?

22 MR. WILLIAMS: It's different in the sense  
23 that I'm making a statement as to what some lawyers  
24 might argue is an implied waiver of something. And I'm  
25 being very cautious. Don't read too much into it. It

1 says what it says.

2 MR. MIHET: Okay. I understand your  
3 position, and I think you understand mine. And we'll  
4 probably just take the time to explore that with the  
5 Court.

6 Can we take another three-minute break?

7 MR. WILLIAMS: Yeah. I'm going to go to  
8 this order before we do. I am sensitive -- and this is  
9 on the record too. The general scope of Plaintiffs'  
10 Rule 30(b)(6) deposition that starts on page six, it's  
11 paragraph seven, and concludes on the second page -- or  
12 the seventh page of United States Magistrate Judge  
13 Sansone's order. And that was the purpose of my most  
14 recent comment because these things are not specifically  
15 delineated in any order. I think Judge Sansone is  
16 counting on counsel to use their common sense and  
17 experience, and that's the reason for my comment.

18 MR. MIHET: Is it your understanding we're  
19 here for a 30(b)(6) deposition today, Mr. Williams?

20 MR. WILLIAMS: No. No. I'm just giving you  
21 the only indication I have of what the Court thinks  
22 about discovery and this case. And we've gone beyond  
23 the dates of her prior order. And so that's what I'm  
24 saying. You can take it for what it's worth and use it  
25 for what you think it's worth.

1 All right. Let's take a break.

2 (Recess)

3 (Plaintiffs' Exhibit No. 4 marked for identification)

4 BY MR. MIHET:

5 Q. Mr. Ruggiero, I've handed you a document that we  
6 have marked as Plaintiffs' Exhibit 4. I'd like for you  
7 to take a look at this document and tell me if you can  
8 confirm that this is City of Tampa's conversion therapy  
9 ordinance that we've been talking about today?

10 A. I want to say yes.

11 Q. Okay. You say you want to say yes?

12 A. I said I would say yes.

13 Q. It is?

14 A. Yes.

15 Q. Okay. Turning over to page six of this document,  
16 you'll see in the provision at the very bottom, which is  
17 Section 7 -- do you see that?

18 A. Yes.

19 Q. In subparagraph (a) it says: "The director shall  
20 have all powers, duties and responsibilities to  
21 administer and enforce the following City Code chapters  
22 or sections." Did I read that correctly?

23 A. Yes.

24 Q. So who is the director of the department of Code  
25 Enforcement?

1 A. That's me.

2 Q. That's you.

3 And it's your understanding then that this  
4 ordinance places with you all powers, duties and  
5 responsibilities to administer and enforce it, correct?

6 A. Yes.

7 Q. Now, is it necessary for you to know what the  
8 ordinance prohibits in order for you to be able to carry  
9 out your duties and responsibilities in enforcing it?

10 A. Yes.

11 Q. Take a look at the -- first of all, on the same  
12 page, page six, when you're looking in Section 5, that's  
13 the section that makes it unlawful for any provider to  
14 practice conversion therapy efforts within the City of  
15 Tampa. Do you see that?

16 A. You're talking about Section 14-312?

17 Q. Right, within Section 5 of the ordinance, yes.

18 A. Yeah, I see it.

19 Q. So then, when you look at the definition of  
20 conversion therapy, of what is prohibited, which appears  
21 at the very bottom of page five, if you'd take a look at  
22 that.

23 A. Okay.

24 Q. Why don't you just take a minute to read that for  
25 yourself so it's fresh in your mind, and then I'll have

1 some questions about it.

2 MR. WILLIAMS: The definition?

3 MR. MIHET: Yes.

4 THE WITNESS: Okay.

5 BY MR. MIHET:

6 Q. Okay. I'll actually read the first sentence for  
7 the record. It says: "Conversion therapy or reparative  
8 therapy means, interchangeably, any counseling, practice  
9 or treatment performed with the goal of changing an  
10 individual's sexual orientation or gender identity,  
11 including, but not limited to, efforts to change  
12 behaviors, gender identity, or gender expression, or to  
13 eliminate or reduce sexual or romantic attractions or  
14 feelings towards individuals of the same gender or sex.  
15 Did I read that correctly?

16 A. Yes.

17 Q. Okay. Does -- I don't see in the -- in the  
18 ordinance a definition for sexual orientation or gender  
19 identity. What do you understand those terms to mean as  
20 the person entrusted with enforcing the ordinance?

21 A. What was the question, again?

22 Q. Sure. I don't see a definition in the ordinance  
23 for sexual orientation or for gender identity. My  
24 question is: What do you understand those terms to  
25 mean?

1 A. Sexual -- what? Sexual orientation?

2 Q. Sexual orientation for gender identity.

3 A. You're asking what my opinion is of it?

4 Q. As the person who is chiefly responsible for  
5 enforcing this document, I'm asking you what your  
6 knowledge is. What do you understand those two terms to  
7 mean? Let's take them in turn. First, sexual  
8 orientation.

9 MR. WILLIAMS: In the context of the  
10 sentence as a whole, I take it?

11 MR. MIHET: As that term is being used in  
12 this document.

13 MR. WILLIAMS: Yeah.

14 THE WITNESS: Sexual orientation?

15 MR. MIHET: Yes.

16 THE WITNESS: To me, it's a decision by an  
17 individual that -- who they want to identify with, a  
18 male or a female. Who they want to be their partner.

19 BY MR. MIHET:

20 Q. And what about gender identity? What does that  
21 term mean?

22 A. Well, a particular individual that wants to  
23 identify themselves -- maybe they're a female. They  
24 want to identify themselves as a male or vice versa.  
25 That's the best I can do.

1 Q. How are the two terms different, if they are?  
2 Sexual orientation, how is it different from gender  
3 identity?

4 A. I don't think I'm qualified to answer that.

5 Q. Okay. Why not?

6 A. Because it's not something that I deal with every  
7 day. I'm not involved with that determination of, you  
8 know, what you're getting at. I'm not involved in that.

9 Q. You are involved with enforcing this ordinance?

10 A. Correct.

11 Q. And you have to know what it provides and what it  
12 prohibits and what it allows in order for you to enforce  
13 it, correct?

14 A. Yeah.

15 Q. And so, seeing as how the ordinance prohibits any  
16 counseling, practice or treatment performed with the  
17 goal of changing an individual's sexual orientation or  
18 gender identity, don't you think it's important for you  
19 to know whether or not there's a difference between  
20 sexual orientation or gender identity?

21 A. Okay. Yes.

22 Q. Okay. So what is the difference between those  
23 two terms?

24 A. Well, the difference, in my opinion, is sexual  
25 orientation is what I just said, who you prefer to be

1 with.

2 Q. Okay.

3 A. And gender identification is, like I just said,  
4 what do you want to be; a male be a female, a female be  
5 a male.

6 Q. Okay.

7 A. That's my understanding of it.

8 Q. As the head of the enforcement division charged  
9 with enforcing this ordinance?

10 A. Yes.

11 Q. Okay. So the ordinance says that, you know,  
12 conversion therapy means any counseling, practice or  
13 treatment performed with the goal of changing an  
14 individual's sexual orientation or gender identity.

15 My question to you is: Whose goal is the  
16 ordinance referring to there?

17 A. I think you have to ask that question to City  
18 counsel.

19 Q. Okay. Well, I'm asking it right now to the  
20 person trusted with enforcing the ordinance.

21 A. Uh-huh.

22 Q. In order for you to determine whether -- or for  
23 your department to determine whether or not a violation  
24 has occurred, you have to determine whether or not there  
25 was a goal of changing an individual's sexual

1 orientation or gender identity, do you not?

2 A. Correct.

3 Q. And so my question to you is: As you go about  
4 enforcing this, whose goal are you looking to see  
5 whether it was a goal of changing someone's sexual  
6 orientation or gender identity?

7 MR. WILLIAMS: And, as to that specific  
8 question, I object to the form because it asked the  
9 question to answer the meaning of a word out of context.

10 BY MR. MIHET:

11 Q. Go ahead. Whose goal must you -- must you look  
12 at to determine whether or not a violation of the  
13 ordinance has occurred?

14 A. I don't understand. The goal of the possible  
15 victim.

16 Q. Okay.

17 A. That's where I would think it would lie.

18 Q. Okay.

19 A. You look at it from the victim's -- are they  
20 being victimized in this.

21 Q. So let's say, for example, you have an adolescent  
22 female, born as a female. Are you with me?

23 A. Yes.

24 Q. Let's say a seventeen-year-old person that was  
25 born biologically as a female but, for some time, she

1 decided that she was going to be a male and identified  
2 as a male. Are you still with me?

3 A. Yep.

4 Q. And now she decides that she wants to try to  
5 change back to being a female, to live in accordance  
6 with her biological body. That is her goal.

7 A. Okay.

8 Q. Okay? Does the ordinance come into play to  
9 prohibit her from receiving therapy to assist her with  
10 her goal of changing her gender identity back to match  
11 her biological body?

12 MR. WILLIAMS: Object to the form to the  
13 extent that it purports to be a hypothetical. If so,  
14 it's an incomplete hypothetical. And also to the extent  
15 it asks this witness to respond to a conclusion of law.

16 But you may give it your best shot,  
17 Mr. Ruggiero.

18 THE WITNESS: Well, that's why we're going  
19 to get the legal department involved because these are  
20 not easy cases in my opinion.

21 MR. MIHET: Okay.

22 THE WITNESS: And my answer would be we'll  
23 get the legal department involved.

24 MR. MIHET: Okay.

25 THE WITNESS: That's all I can add to that.

1 BY MR. MIHET:

2 Q. So you say these are not easy. Do you not feel  
3 qualified to make a determination as to whether or not  
4 the example I just gave you would be something that  
5 would be conversion therapy prohibited by the ordinance?

6 MR. WILLIAMS: Same objection.

7 Please proceed.

8 THE WITNESS: Yeah, I don't -- I don't think  
9 I -- what was you trying to get at, again?

10 BY MR. MIHET:

11 Q. Do you feel qualified or able to -- to tell me  
12 whether or not the example I gave you with the  
13 adolescent girl, whether that constitutes conversion  
14 therapy that is banned by the ordinance?

15 A. My -- my answer to that is that I'm going to  
16 present those facts to our legal adviser.

17 Q. Okay.

18 A. And then we're going to proceed from there.

19 Q. But you, yourself, are you qualified to make that  
20 determination?

21 A. What kind of qualifications are you looking for?

22 Q. Are you able? Do you feel able to make that  
23 determination yourself?

24 MR. WILLIAMS: Again, objection.

25 Overly broad under the circumstances of this

1 case and an improper hypothetical. I'm just making that  
2 for the record.

3 You can give it your best shot,  
4 Mr. Ruggiero.

5 THE WITNESS: In your example, female wants  
6 to be a male, goes to counseling and then wants to  
7 convert back to the female, correct?

8 MR. MIHET: No. Let's refresh the example.

9 THE WITNESS: Yeah.

10 BY MR. MIHET:

11 Q. Adolescent seventeen-year-old was born  
12 biologically as a female.

13 A. Okay.

14 Q. For some time, she identified as a male and lived  
15 with a male gender identity. That was in the past. Now  
16 she decides she wants to change her gender identity back  
17 to female to match her biological gender, and she  
18 decides she needs help with that change. She can't do  
19 it on her own. It's too difficult. There's too many  
20 mental issues involved. And so she goes to a counselor  
21 within the City of Tampa and says, Mr. or Mrs.  
22 Counselor, I need your help. I need your counseling. I  
23 need your therapy to help me with this change that I  
24 want to make back from a male gender identity to a  
25 female gender identity. The counselor says, if that's

1 your goal, if that's your desire, I'm willing to help  
2 walk you and talk you through that. Let's go do some  
3 counseling.

4 A. Okay.

5 Q. And they go do counseling. And, as a result of  
6 that counseling, now the female has changed; and she  
7 identifies as a female, no longer as a male. Is that  
8 example clear?

9 A. Yes.

10 Q. Is that example a violation of the ordinance's  
11 prohibition on Sexual Orientation or Gender Identity  
12 Change Efforts?

13 MR. WILLIAMS: Repeat the same objection as  
14 to form.

15 Overly broad and improper and incomplete  
16 hypothetical, and calls for speculation.

17 THE WITNESS: How do we get involved?

18 BY MR. MIHET:

19 Q. Someone calls you, say a neighbor of this person;  
20 and the neighbor says, man, over coffee yesterday, this  
21 person told me that this happened. You know? I asked  
22 her why she doesn't identify as a boy anymore; and she  
23 said, well, I went and I got some counseling because I  
24 wanted to change. And now, because of what Dr. So and  
25 So helped me, now I identify as a girl.

1           So now this neighbor is aware of this ordinance,  
2     and she calls you up. Says, Mr. Ruggiero, I heard -- I  
3     heard something that I think you should know about. And  
4     she files a complaint with you.

5           MR. WILLIAMS: Same objection.

6           THE WITNESS: I mean, my answer is going to  
7     be the same as I said. We're going to put it through  
8     the legal department. I mean, that's the best I can do  
9     for you.

10    BY MR. MIHET:

11       Q. Okay. You're not able to tell me whether that's  
12    a violation of the ordinance or not?

13       A. We're going to put it through the legal  
14    department. Just as --

15       Q. Okay.

16       A. -- you know, like the training was set up.  
17    That's the way we're going to operate.

18       Q. But, as you sit here today, you're not able to  
19    tell me whether that example is a violation of the  
20    ordinance or not?

21       A. My answer is is I'm going to put it in front of  
22    the legal department.

23       Q. That's not the question. You're answering a  
24    question that I'm not asking, and I can appreciate that.

25           My question is: Are you able to tell me as you

1 sit here today whether or not the example we've  
2 discussed is a violation of the ordinance?

3 MR. WILLIAMS: Repeat the same objections.

4 BY MR. MIHET:

5 Q. You either are able or you're not able. My  
6 question is which -- which of those two?

7 A. In the example that you gave --

8 Q. Yes.

9 A. -- with a complainant that's getting to us --

10 Q. Yes.

11 A. -- I think that we could initially talk to that  
12 complainant and then refer to the legal department to  
13 see how we would proceed further.

14 Q. Okay. If there are no other facts other than  
15 what I've just told you, has a violation taken place or  
16 not?

17 MR. WILLIAMS: Same objection.

18 THE WITNESS: My answer is that there is a  
19 violation in that it needs to be referred to the legal  
20 department to see how we proceed further.

21 BY MR. MIHET:

22 Q. Okay. So your conclusion would be that the  
23 example that we talked about is a form of conversion  
24 therapy that is prohibited by the ordinance?

25 A. That would -- yes.

1 Q. Okay. And so suppose you talk to legal; and  
2 legal says, we need to conduct an investigation. What  
3 do you do next?

4 A. Well, we would interview the person that you said  
5 called us.

6 Q. Okay. And, when you say, "we," one of your code  
7 enforcers?

8 A. Not me. It would be a Code Enforcement officer,  
9 yeah.

10 Q. One of your code enforcers with a high school  
11 diploma would go out there --

12 A. Well, I mean, yeah, with a high school diploma --

13 Q. Would go out there --

14 A. -- hardworking code enforcement officer --

15 Q. Correct.

16 A. -- yes.

17 Q. Would go out there and interview the neighbor as  
18 to her complaint?

19 A. Correct.

20 Q. What else would that code enforcer do?

21 A. Well, they would have to bring that information  
22 back to the legal department.

23 Q. Okay.

24 A. And then we'll see where we go next.

25 Q. Would that code enforcer then also talk to the

1 alleged victim about what happened?

2 A. We would see, after that initial interview,  
3 what -- what the legal department would recommend --

4 Q. Okay.

5 A. -- and then go from there.

6 Q. Code Enforcement would not be able to make a  
7 decision about what to do next without talking to legal  
8 first?

9 A. Correct.

10 Q. Why not?

11 A. Because that's the way we set it up.

12 Q. Okay. Why?

13 A. Because the legal department is going to handle  
14 this in court, and they need -- they need the facts and  
15 circumstances and direct the investigation just like a  
16 prosecutor would do under any other normal circumstance.

17 Q. Under a normal circumstance, a prosecutor would  
18 tell the cops when or where to do a drug bust, for  
19 example?

20 A. No, not that. Not that. But, I mean, there's --  
21 you know, I worked narcotics years ago --

22 Q. Okay.

23 A. -- and there's certain things that you might get  
24 with them on to see how they -- how they want to handle  
25 something.

1 Q. Okay. But you wouldn't get with them to see  
2 whether you should arrest someone for possession of  
3 narcotics, would you?

4 A. In certain cases, we did.

5 Q. You did?

6 A. Yes.

7 Q. They would direct you whom to arrest?

8 A. They didn't say, go get that guy. We would give  
9 them facts and circumstances and see if they were  
10 comfortable with a case --

11 Q. Okay.

12 A. -- that type of thing.

13 Q. Okay. And so would you interview the -- the  
14 doctor, the alleged violator? Would you interview any  
15 other witnesses? How would this investigation play out?

16 MR. WILLIAMS: Same objection.

17 We're getting into hypotheticals upon  
18 hypotheticals, and they're improper. And I'm going to  
19 make that objection, and I'm going to object every time.  
20 So I'll just say same objection, and that's what I'm  
21 referring to is the series of objections that I've made  
22 for the last ten minutes.

23 Please answer the question if you feel  
24 capable of doing so.

25 THE WITNESS: Would we interview the doctor?

1 MR. MIHET: Yeah.

2 THE WITNESS: Well, that would be -- depend  
3 on what direction we receive from the legal department.

4 BY MR. MIHET:

5 Q. You couldn't decide whether or not to interview  
6 the doctor unless you talked to legal first?

7 A. Correct.

8 Q. Just like you couldn't decide whether or not to  
9 interview the victim unless you talked to legal first?

10 A. Correct.

11 Q. Okay. Suppose a -- a notice of violation or a  
12 citation is issued in the circumstance we've been  
13 talking about, what -- what would happen then in the  
14 enforcement process?

15 MR. WILLIAMS: Same objection.

16 THE WITNESS: I don't understand.

17 BY MR. MIHET:

18 Q. Well, you end up issuing a notice of violation,  
19 yes?

20 A. All right.

21 Q. And what happens next in the -- in the  
22 enforcement process?

23 A. I don't -- I can't answer that because I don't  
24 know -- it's a hypothetical question that I don't know  
25 the outcome of.

1 Q. Okay.

2 A. You know? I can't answer that question.

3 Q. As the -- as the head of the department that's  
4 charged with enforcing the ordinance, you don't --  
5 you're not able to tell me what happens after a notice  
6 of violation is issued in the enforcement process?

7 A. Well, this is irrevocable, so it would go right  
8 to a ticket.

9 Q. Okay.

10 A. So...

11 Q. All right. So a ticket is issued?

12 A. Correct.

13 Q. The doctor has been ticketed for engaging in  
14 conversion therapy with this adolescent  
15 seventeen-year-old female we've been talking about.  
16 What happens next in the enforcement process?

17 A. They either pay the ticket or they challenge it.

18 Q. Okay. And, if they challenge it, what happens  
19 next?

20 A. It goes to a court system.

21 Q. Does it go to a court or a special magistrate?

22 A. No, that should go to the court.

23 Q. It does?

24 A. (The witness nods head).

25 Q. Okay. Why do you believe it goes to the court?

1 A. Because it's -- it's a -- a ticket with a fine on  
2 it, and that's where they appeal those tickets at.

3 Q. To the court?

4 A. Yes.

5 Q. There would not be a special magistrate involved?

6 A. Not in this particular case.

7 Q. If you determine that a violation has occurred,  
8 is there any other possibility besides issuing a ticket?  
9 When I say, "any other possibility," is there any other  
10 possibility of bringing the matter forward and  
11 continuing the enforcement process besides issuing a  
12 ticket?

13 A. Give me an example.

14 Q. A letter written to the doctor saying, this is  
15 what was reported, don't do it again kind of a thing.  
16 Or --

17 A. Like a warning letter?

18 Q. Yeah, a warning letter. I mean, you know, you're  
19 the enforcement official --

20 A. No, I don't --

21 Q. -- so I'm asking you.

22 A. -- know of anything like that.

23 Q. Okay. The only way to engage the enforcement  
24 process and to move the matter forward is through the  
25 issuance of a ticket?

1 A. Correct.

2 Q. Let's talk about another example. Instead of the  
3 seventeen-year-old adolescent girl, we've got a  
4 prepuberty child, say a ten-year-old, born as a boy but  
5 has expressed a female gender identity.

6 MR. WILLIAMS: At the age of ten?

7 MR. MIHET: Yes. Okay?

8 BY MR. MIHET:

9 Q. Would the ordinance prohibit a therapist in the  
10 City of Tampa from encouraging that child to embrace his  
11 given male -- biological male identity --

12 MR. WILLIAMS: Same objection.

13 BY MR. MIHET:

14 Q. -- and to align with his gender role?

15 A. Yes.

16 Q. It would?

17 A. Yes.

18 Q. Even if the child voluntarily assents to that  
19 kind of therapy and even requests help to be more like a  
20 boy, that would still be a violation under the  
21 ordinance?

22 MR. WILLIAMS: Same objection.

23 THE WITNESS: I feel as though I have to be  
24 an appellate court judge to answer that question.

25 MR. MIHET: Okay.

1 THE WITNESS: My answer would be yes.

2 BY MR. MIHET:

3 Q. Okay. Would the ordinance prohibit a therapist  
4 from verbally endorsing and supporting behaviors and  
5 attitudes that align with that child's sex at birth?  
6 For example, saying, look, you know, boys like to play  
7 with trucks and football and whatnot. Would you feel  
8 comfortable spending more of your time engaged in those  
9 typically male activities? Would that be a violation of  
10 the ordinance for a counsellor to say to someone like  
11 that?

12 A. I --

13 MR. WILLIAMS: Same objection.

14 THE WITNESS: Oh, sorry.

15 MR. WILLIAMS: Just making my objection.

16 THE WITNESS: Are you asking me if they --  
17 what toys they play with, would that --

18 MR. MIHET: Yeah, as one component.

19 BY MR. MIHET:

20 Q. Gender confused child comes to a therapist  
21 biologically born as a boy but now having some female  
22 tendencies, would it be a violation of the ordinance for  
23 the therapist to encourage this biological boy to be  
24 more comfortable and to act in ways that are  
25 traditionally associated with boys and male behavior?

1 MR. WILLIAMS: Same objection.

2 I'll augment it by saying the question as  
3 posed is vague and imprecise as to form.

4 THE WITNESS: I -- you know, I would have to  
5 say if -- if there's any therapy involved in trying to  
6 change the child into something else --

7 MR. MIHET: Uh-huh.

8 THE WITNESS: -- I would have to say that,  
9 yes.

10 BY MR. MIHET:

11 Q. That would be a violation?

12 A. Yes.

13 Q. Even if the child voluntarily assents to it and  
14 requests it?

15 A. Now you're asking -- I don't know -- you know --  
16 I don't know who's complaining, who's -- there's a lot  
17 of factors I don't know. But if they -- you know --

18 Q. The neighbor is complaining.

19 A. Okay. It's something that -- it's -- it could  
20 be -- it's a violation.

21 Q. Okay.

22 A. Yeah.

23 Q. Okay. Now, say you have an adolescent  
24 sixteen-year-old boy born biologically as a boy and he  
25 is going through an uncertain time now in his life; and

1 he's just not sure whether or not he is a boy or whether  
2 or not he wants to identify as a girl. He's kind of  
3 exploring the options and the possibilities. Are you  
4 with me?

5 A. Yes. He's a boy --

6 Q. He's a boy exploring some ideas and some thoughts  
7 but hasn't yet made a decision, hey, I'm a girl now.  
8 Okay? Are you with me?

9 A. Yes.

10 Q. He goes to a therapist in -- a licensed therapist  
11 in the City of Tampa to seek help with the things that  
12 he's struggling with. And, after receiving that help,  
13 he decides he doesn't want to change. He's going to  
14 stay as a boy and identify as a boy. Has the therapist  
15 committed a violation of the ordinance in that example?

16 MR. WILLIAMS: Same objection as to the last  
17 objection, the one that I augmented.

18 THE WITNESS: He decided that he wanted to  
19 go back? The counselor didn't sway him one way or the  
20 other?

21 BY MR. MIHET:

22 Q. Yeah, because -- he hasn't yet changed --

23 A. Right.

24 Q. -- to be a girl, but he was questioning or  
25 thinking about it. He goes and has some counseling; and

1 he decides, nah, I think I'm going to remain as a boy.

2 A. Well --

3 MR. WILLIAMS: Same objection.

4 THE WITNESS: Oh, sorry.

5 MR. WILLIAMS: Go ahead. I'm just making a  
6 record.

7 THE WITNESS: I'm just looking at this  
8 section here that talks about counseling therapy --  
9 conversion therapy does not include counseling that  
10 provides support and assistance to a person undergoing  
11 gender transition or counseling that provides acceptance  
12 and support. I think that example applies in there, so  
13 I don't think it would be a violation.

14 BY MR. MIHET:

15 Q. That would not be a violation. Okay.

16 So, if the boy doesn't yet reach the stage where  
17 he's changed to be a girl, there is no violation. But,  
18 if the boy has already reached the stage where he  
19 identifies as a girl and now seeks help to change back  
20 to a boy, then that would be a violation?

21 MR. WILLIAMS: Same objection.

22 You're asking, by the way, his -- his  
23 answer, not his answer guided by legal counsel; is that  
24 right?

25 MR. MIHET: I'm asking for your answer as

1 the head of the Code Enforcement division which is the  
2 principal and sole authority charged with enforcing the  
3 conversion therapy ordinance.

4 THE WITNESS: I'm just going to say my  
5 answer is I'm always going to get with the legal  
6 department. No matter what you say or how you twist it,  
7 they're going to be involved without --

8 MR. MIHET: Okay.

9 THE WITNESS: You know, say the question,  
10 again.

11 BY MR. MIHET:

12 Q. So I believe your testimony was that, if this boy  
13 that we've been talking about hasn't yet reached a  
14 decision to identify as a girl and receives counseling  
15 and decides to remain a boy, there is no violation of  
16 the ordinance, right? Is that what you told me earlier?

17 A. Yeah. I'm just going to say it's like -- in my  
18 opinion, it's exploratory --

19 Q. Okay.

20 A. -- and nothing -- yeah.

21 Q. Okay. I understood that. We're clear.

22 But, if the same boy actually reaches the point  
23 where he identifies as a girl --

24 A. Okay.

25 Q. -- and then seeks and receives voluntary

1 counseling to assist him to change back to be a boy, I  
2 believe, in that scenario, you testified earlier that  
3 that would be a violation of the ordinance?

4 A. Yes.

5 Q. Right?

6 A. Yes.

7 Q. So, in those two examples then, the difference is  
8 whether or not the boy has actually reached the point  
9 where he identifies as a girl or whether he's still  
10 exploring, right?

11 A. Yes.

12 Q. Okay. Is that a determination that you would be  
13 able to make based on your expertise and your training  
14 and your qualifications?

15 A. No.

16 MR. WILLIAMS: Objection. Overly vague.

17 THE WITNESS: Sorry.

18 MR. WILLIAMS: It's overly vague.

19 BY MR. MIHET:

20 Q. Is that a determination that any of your Code  
21 Enforcement officers would be able to make based on  
22 their training and experience and expertise?

23 MR. WILLIAMS: Same objection.

24 Calls for speculation, as well.

25 THE WITNESS: No.

1 BY MR. MIHET:

2 Q. Okay. If you look at the ordinance, again, the  
3 definition of conversion therapy --

4 A. Which page are you on?

5 Q. Still page five on the bottom.

6 A. Okay.

7 Q. It's still first sentence. It says: "Conversion  
8 therapy or reparative therapy means, interchangeably,  
9 any counseling, practice or treatment performed with the  
10 goal of changing an individual's sexual orientation or  
11 gender identity including, but not limited to, efforts  
12 to change behaviors, gender identity, or gender  
13 expression." Do you see that?

14 A. Yes.

15 Q. So my question is: The reference to efforts to  
16 change behaviors, what -- what do you understand that to  
17 be a prohibition of? Behaviors.

18 A. Behaviors as far as changing their identity? Is  
19 that what you're getting at?

20 Q. I'm asking you.

21 A. That's my -- when I look at this, it's -- to me,  
22 it's any effort that changes the behavior from a boy  
23 trying to become a female.

24 Q. Okay. What about behaviors in terms of sexual  
25 conduct? You know, say a seventeen-year-old boy comes

1 to a counselor within the City of Tampa, a licensed  
2 therapist, and says, Doctor, I have been having sexual  
3 intercourse with other boys. I don't feel good about  
4 that, and I would like to stop that behavior. Can you  
5 please walk me through and help me to change that  
6 behavior. Would that --

7 MR. WILLIAMS: Objection.

8 MR. MIHET: Let me ask my question, first.

9 MR. WILLIAMS: Sure. Sure. I'm sorry.  
10 Just let me know when you're through.

11 BY MR. MIHET:

12 Q. Would that be counseling that would be prohibited  
13 by the ordinance?

14 MR. WILLIAMS: Object to the form as being  
15 overly broad, too vague and constituting an improper,  
16 incomplete hypothetical.

17 MR. MIHET: Okay.

18 MR. WILLIAMS: And, Mr. Ruggiero, I'm making  
19 these objections for the record what this lady is typing  
20 down so I can preserve my objections as to form, which  
21 I'm required to do under the rules of evidence. But  
22 that should not deter you from giving an answer, if you  
23 can do so. If it calls for an answer that I believe is  
24 not mandated because it's privileged or something like  
25 that, I will so inform you; and we can go from there.

Vazzo v. City of Tampa  
Sal Ruggiero

10/30/2018

Page 104

1 Okay?

2 THE WITNESS: All right.

3 BY MR. MIHET:

4 Q. In other words, unless he specifically tells you  
5 not to answer a question, then let the lawyers and the  
6 judge worry about the objections that he makes. Okay?

7 THE WITNESS: Yes.

8 MR. WILLIAMS: That's another way to put it.  
9 I agree. Except, I don't instruct people not to answer  
10 questions. It's not appropriate.

11 THE WITNESS: All right. So is it a  
12 violation?

13 MR. MIHET: Yes.

14 THE WITNESS: The therapy to convert him  
15 from going -- you know, not having sex with other boys?

16 MR. MIHET: Yeah. So...

17 THE WITNESS: Yes.

18 BY MR. MIHET:

19 Q. It is?

20 A. Yes.

21 Q. So just because it's been a while since we had  
22 the example, you have the boy that comes in, tells a  
23 doctor that he's been having sex with other boys, that  
24 he doesn't feel good about it and wants to stop that  
25 behavior. If the doctor engages in counseling to help

Vazzo v. City of Tampa  
Sal Ruggiero

10/30/2018

Page 105

1 him to no longer have sex with boys, to become  
2 abstinent, that's the kind of change therapy that the  
3 ordinance prohibits?

4 A. Yes.

5 MR. MIHET: Okay. I think we're getting  
6 close to being done. Let me take a quick break with my  
7 counsel here, and we'll see about wrapping this up.

8 (Recess)

9 MR. MIHET: Back on the record. All right.  
10 Mr. Ruggiero, those are all the questions that I have  
11 for you today. You've been very helpful. Thank you.

12 THE WITNESS: All right. Thank you.

13 MR. WILLIAMS: I have no questions.

14 (Proceedings concluded at 12:59 o'clock p.m.)  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

Vazzo v. City of Tampa  
Sal Ruggiero

10/30/2018

Page 106

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

CERTIFICATE OF OATH

STATE OF FLORIDA)  
COUNTY OF PALM BEACH)

I, Rachele L. Cibula, the undersigned authority,  
certify that SAL RUGGIERO personally appeared before me  
and was duly sworn.

Witness my hand and official seal this 2nd day of  
November, 2018.



RACHELE L. CIBULA  
Notary Public, State of Florida  
My Commission #FF 936928  
Expires: December 14, 2019

Vazzo v. City of Tampa  
Sal Ruggiero

10/30/2018

Page 107

1 C E R T I F I C A T E

2 THE STATE OF FLORIDA)

3 COUNTY OF PALM BEACH)

4

5 I, Rachele Lynn Cibula, Notary Public, State of  
6 Florida at Large,

7 DO HEREBY CERTIFY that I was authorized to and did  
8 stenographically report the foregoing deposition; and  
9 that the transcript is a true and correct transcription  
10 of the testimony given by the witness.

11 I FURTHER CERTIFY that I am not a relative, employee,  
12 attorney or counsel connected with the action, nor am I  
13 financially interested in the action.

14 Dated this 2nd day of November, 2018.

15

16

17

18

19

20

21

  
RACHELE LYNN CIBULA, NOTARY PUBLIC

22

23

24

25

<b>A</b>				
<b>able</b> 45:20 47:3 51:24 70:9 71:3 77:8 84:11,22 84:22 87:11,18 87:25 88:5,5 90:6 93:5 101:13,21	<b>adviser</b> 22:15 60:10,17 84:16 <b>Advocacy</b> 11:24 <b>affidavit</b> 67:19 <b>afternoon</b> 41:19 42:10 <b>age</b> 95:6 <b>ago</b> 52:1 58:20 90:21 <b>agree</b> 62:19 70:1 70:25 104:9 <b>agreed</b> 43:13 <b>agreement</b> 58:21 62:11,13 <b>Ah</b> 35:25 <b>ahead</b> 30:3 52:6 61:5 82:11 99:5 <b>Alan</b> 47:24 48:1 <b>align</b> 95:14 96:5 <b>alleged</b> 90:1 91:14 <b>allowing</b> 55:1 74:16 <b>allows</b> 80:12 <b>ambit</b> 43:10,18 <b>Amos</b> 48:23 <b>answer</b> 5:9,21,23 20:21 21:19,21 25:3 29:15 30:1 32:14,24 39:7 40:3 54:10 61:7 62:5,13 65:13 66:15 68:11,12 68:13 71:11,13 80:4 82:9 83:22 84:15 87:6,21 88:18 91:23 92:23 93:2 95:24 96:1 99:23,23,25 100:5 103:22,23 104:5,9 <b>answered</b> 50:14 <b>answering</b> 21:11 87:23 <b>answers</b> 5:12	43:23 <b>anticipation</b> 35:24 <b>anymore</b> 86:22 <b>anytime</b> 8:1 10:15 <b>apparently</b> 43:5 52:1 <b>appeal</b> 94:2 <b>appear</b> 12:25 27:8 <b>APPEARANCES</b> 2:1 <b>appeared</b> 106:7 <b>appears</b> 45:1 61:17 65:18 77:20 <b>appellate</b> 95:24 <b>applies</b> 99:12 <b>appointed</b> 9:24 10:1,2,4,11 <b>appointing</b> 10:7 10:10 <b>appointment</b> 10:12 <b>appreciate</b> 87:24 <b>appropriate</b> 5:13 13:19 25:12 34:7 44:3 66:12 73:8 104:10 <b>approved</b> 10:6 <b>approximately</b> 16:10 57:14 <b>April</b> 22:14 <b>area</b> 70:23 <b>arena</b> 69:22 <b>argue</b> 31:15 41:10 74:24 <b>arrest</b> 91:2,7 <b>arrive</b> 53:2 <b>articulated</b> 41:25 <b>asked</b> 20:20 37:12 37:23 51:23 53:9,17 82:8 86:21 <b>asking</b> 30:4 32:6 37:25 56:2	58:20 64:25 66:1 71:2 79:3,5 81:19 87:24 94:21 96:16 97:15 99:22,25 102:20 <b>asks</b> 83:15 <b>assents</b> 95:18 97:13 <b>assign</b> 34:7 <b>assigned</b> 16:23 <b>assist</b> 83:9 101:1 <b>assistance</b> 69:7 99:10 <b>assistant</b> 23:3 43:7 <b>assistants</b> 14:9 <b>associated</b> 96:25 <b>assume</b> 42:15 <b>assuming</b> 59:6 <b>attach</b> 56:17 <b>attached</b> 56:18 <b>attaching</b> 54:12 55:9 <b>attachment</b> 56:16 56:17 <b>attempt</b> 71:24 <b>attend</b> 22:12 45:21 48:25 <b>attendance</b> 47:5 48:21 <b>attendees</b> 45:13 <b>attending</b> 66:2 <b>attitudes</b> 96:5 <b>attorney</b> 23:3 39:1 43:7 68:10 107:12 <b>attorneys</b> 2:4,9 13:2 <b>attractions</b> 78:13 <b>audio</b> 35:1,8 <b>augment</b> 97:2 <b>augmented</b> 98:17 <b>August</b> 22:19 34:11 37:8,14	37:14 38:12 43:3 44:23 45:6 52:22 59:9,13 60:1 72:14 <b>authored</b> 43:6 <b>authority</b> 100:2 106:6 <b>authorized</b> 107:7 <b>available</b> 40:23 <b>avoid</b> 74:14,18 <b>aware</b> 21:16 73:24 87:1
				<b>B</b>
				<b>bachelor's</b> 11:2 <b>back</b> 29:18,19 41:14 51:17 83:5,10 85:7,16 85:24 89:22 98:19 99:19 101:1 105:9 <b>background</b> 10:25 <b>banned</b> 84:14 <b>banning</b> 6:12 <b>based</b> 21:11 28:8 43:13 59:6 101:13,21 <b>basically</b> 17:18 18:23 34:13,14 <b>basis</b> 52:10 <b>BAY</b> 1:11 <b>BEACH</b> 106:4 107:3 <b>began</b> 55:10,11 <b>behalf</b> 1:8,9,11 <b>behavior</b> 96:25 102:22 103:4,6 104:25 <b>behaviors</b> 78:12 96:4 102:12,16 102:17,18,24 <b>believe</b> 29:3 41:15 58:5 61:10 93:25 100:12

<p>101:2 103:23  <b>belongs</b> 28:20                  31:5  <b>benefit</b> 41:16  <b>best</b> 39:9,12 50:18                  69:15 79:25                  83:16 85:3 87:8  <b>better</b> 11:21                  68:11  <b>beyond</b> 19:19                  75:22  <b>big</b> 51:13  <b>Billie</b> 48:7,7  <b>biological</b> 83:6,11                  85:17 95:11                  96:23  <b>biologically</b> 82:25                  85:12 96:21                  97:24  <b>birth</b> 96:5  <b>bit</b> 13:18,23 15:16                  23:17  <b>blank</b> 11:5  <b>Bob</b> 18:4  <b>body</b> 10:7 83:6,11  <b>book</b> 18:16,18  <b>born</b> 82:22,25                  85:11 95:4                  96:21 97:24  <b>bottom</b> 23:10                  46:11 48:9 56:7                  56:12 76:16                  77:21 102:5  <b>Boulevard</b> 2:12  <b>boundaries</b> 55:4  <b>Bowmer</b> 47:8  <b>Box</b> 2:2,8  <b>boy</b> 86:22 95:4,20                  96:21,23 97:24                  97:24 98:1,5,6                  98:14,14 99:1                  99:16,18,20                  100:12,15,22                  101:1,8 102:22                  102:25 104:22</p>	<p><b>boys</b> 96:6,25                  103:3 104:15,23                  105:1  <b>break</b> 6:1 42:17                  44:10 51:19                  75:6 76:1 105:6  <b>briefly</b> 10:24  <b>bring</b> 23:19 24:6                  31:6 34:15                  35:18 44:2                  89:21  <b>bringing</b> 94:10  <b>broad</b> 84:25 86:15                  103:15  <b>broken</b> 15:9  <b>Buckhorn</b> 10:5                  18:4  <b>build</b> 31:20  <b>building</b> 18:20                  26:16 69:5  <b>buildings</b> 18:24  <b>BURR</b> 2:7  <b>business</b> 8:10,14                  8:16 9:1 17:14                  67:8  <b>businesses</b> 8:16  <b>bust</b> 90:18</p> <hr/> <p style="text-align: center;"><b>C</b></p> <hr/> <p><b>C</b> 107:1,1  <b>call</b> 8:10,11 9:1                  11:21 12:23                  13:19 14:10                  15:12 17:16                  34:5 35:18                  53:13,14 63:7                  67:11  <b>called</b> 37:12 53:16                  89:5  <b>calls</b> 8:12 29:4                  32:10 61:2                  86:16,19 87:2                  101:24 103:23  <b>candidate</b> 24:5  <b>capable</b> 69:6</p>	<p>91:24  <b>capacity</b> 1:15  <b>caps</b> 60:24 61:11                  61:17  <b>Carlos</b> 47:17,21  <b>carry</b> 77:8  <b>case</b> 23:6 25:4                  26:20,22 27:20                  28:4,19 30:6                  31:1,20,21                  34:14 56:6                  66:15 69:3,4                  75:22 85:1                  91:10 94:6  <b>cases</b> 26:15 31:10                  31:16 49:24                  58:8,16 60:22                  61:13,21,22                  62:1,8 63:1,9,17                  64:2 65:5,20                  66:11,19 67:4                  67:10,14,15,24                  68:4,6 83:20                  91:4  <b>cause</b> 4:5 24:25  <b>cautious</b> 74:25  <b>center</b> 8:10,11 9:1                  17:16  <b>certain</b> 32:18                  90:23 91:4  <b>certainly</b> 21:25                  39:24 40:10                  55:4  <b>CERTIFICATE</b>                  106:1  <b>certification</b>                  19:13,14,19                  20:2  <b>certifications</b>                  11:12 18:12  <b>certified</b> 4:14                  11:4,9 18:13,15  <b>certify</b> 106:7                  107:7,11  <b>chain</b> 55:12</p>	<p><b>challenge</b> 26:7,8                  93:17,18  <b>chance</b> 42:11                  51:11  <b>change</b> 6:16,21                  78:11 83:5                  85:16,18,23                  86:12,24 97:6                  98:13 99:19                  101:1 102:12,16                  103:5 105:2  <b>changed</b> 86:6                  98:22 99:17  <b>changes</b> 102:22  <b>changing</b> 78:9                  80:17 81:13,25                  82:5 83:10                  102:10,18  <b>chapters</b> 76:21  <b>characterize</b>                  66:23,25 67:7  <b>charged</b> 81:8 93:4                  100:2  <b>check</b> 48:22  <b>chiefly</b> 79:4  <b>child</b> 69:13 70:3                  95:4,10,18                  96:20 97:6,13  <b>child's</b> 96:5  <b>Cibula</b> 4:2 106:6                  106:19 107:5,21  <b>circumstance</b>                  90:16,17 92:12  <b>circumstances</b> 7:2                  31:4 84:25                  90:15 91:9  <b>citation</b> 25:13                  32:21 33:9                  92:12  <b>citizen</b> 8:13  <b>city</b> 1:14,15 2:9                  2:11 3:11 4:4                  6:7,8 7:4 8:3,17                  10:17 12:25                  15:11 16:11</p>	<p>18:1,5 19:24                  20:9,12 21:4,11                  21:13,16,25                  23:3,14 25:8                  39:16 41:23                  42:6 43:7,10,13                  43:17 46:4,20                  47:1 67:17                  68:17,22 73:13                  76:8,21 77:14                  81:17 85:21                  95:10 98:11                  103:1  <b>City's</b> 43:25  <b>citywide</b> 16:20  <b>Ciucio</b> 47:22 48:2                  48:3  <b>Civil</b> 1:2  <b>clarity</b> 20:4  <b>clean-up</b> 8:9,12                  15:1,6,10,13,19                  16:4,4,6 17:11  <b>cleans</b> 9:8,11  <b>clear</b> 21:2 57:7                  74:12 86:8                  100:21  <b>clearly</b> 5:6 15:24                  61:2  <b>clearly-delineat...</b>                  15:21  <b>click</b> 56:4  <b>clients</b> 1:11  <b>close</b> 15:17 105:6  <b>code</b> 3:6,8 8:8,12                  8:19,23 9:5,14                  9:15 13:14,16                  13:17,18,23                  14:6 16:10 17:6                  18:6,15 19:12                  19:13,20,24                  20:2,5,9,12                  21:16 22:1,4                  23:14 24:20                  25:9,10 26:13                  27:16,20 28:6,9</p>
--	--	--	--	--

28:21,21 29:5 29:12,14 30:13 30:14 31:22 32:11 33:4,9,17 34:11 41:6 43:6 44:13 45:7,15 46:3,17,20,25 49:5 52:22 54:2 60:11 65:24 66:8,10 68:17 68:19,22 69:5 69:16 70:15 71:15 72:5 73:8 73:18 76:21,24 89:6,8,10,14,20 89:25 90:6 100:1 101:20 <b>codes</b> 68:18 <b>coffee</b> 86:20 <b>collects</b> 8:16 <b>colloquy</b> 51:18 <b>combination</b> 14:25 <b>come</b> 17:14,17 26:5 31:25 36:11 43:10 50:12 73:18 83:8 <b>comes</b> 25:3 96:20 102:25 104:22 <b>comfortable</b> 91:10 96:8,24 <b>coming</b> 9:21 64:24 <b>commander</b> 10:21 <b>comment</b> 28:5 75:14,17 <b>comments</b> 43:8,9 <b>Commission</b> 106:20 <b>committed</b> 98:15 <b>common</b> 29:6 75:16 <b>communication</b>	54:13 55:8,10 56:7 <b>communications</b> 56:13 <b>complainant</b> 88:9 88:12 <b>complaining</b> 97:16,18 <b>complaint</b> 23:7,10 23:16 24:24 28:7 33:23 34:6 87:4 89:18 <b>complaints</b> 17:9 22:6 24:16 <b>complicated</b> 23:19 24:3 <b>complied</b> 42:2 <b>comply</b> 39:9,14 41:24 <b>component</b> 96:18 <b>concerned</b> 43:10 43:17,17 52:2 70:12 <b>concerns</b> 72:24 <b>concluded</b> 105:14 <b>concludes</b> 75:11 <b>conclusion</b> 83:15 88:22 <b>condition</b> 9:5 <b>conditions</b> 18:20 <b>conduct</b> 64:14 89:2 102:25 <b>conducted</b> 44:13 <b>confirm</b> 76:8 <b>confused</b> 96:20 <b>confusion</b> 70:3 <b>conjunction</b> 28:19 <b>connected</b> 107:12 <b>connotation</b> 65:10 65:11 <b>consider</b> 39:16 <b>consideration</b> 12:6,13 60:19 <b>consist</b> 34:12 35:15	<b>constituents</b> 1:11 <b>constitutes</b> 84:13 <b>constituting</b> 103:15 <b>construction</b> 18:20 <b>consult</b> 39:16 <b>contact</b> 60:14 <b>context</b> 20:17 79:9 82:9 <b>continue</b> 65:9 <b>continuing</b> 94:11 <b>control</b> 40:11 <b>conversation</b> 53:24 63:14,19 64:9 <b>conversations</b> 58:19 73:5,23 <b>conversion</b> 3:8 6:12 12:3 22:7 27:19 30:18 49:12,19,23,24 52:20 58:4,6,8 58:16 59:16 60:22 63:9,17 64:1 65:20 66:13 67:3,10 67:14 68:6 69:25 71:20,25 72:2 73:9 74:4 76:8 77:14,20 78:7 81:12 84:5 84:13 88:23 93:14 99:9 100:3 102:3,7 <b>convert</b> 85:7 104:14 <b>convey</b> 61:12 <b>conveyed</b> 53:12 <b>cops</b> 90:18 <b>copy</b> 40:9,22 43:20 <b>correct</b> 9:18,23 14:19,22 16:9 17:25 18:10	20:3,22 21:24 27:6,17 29:2 30:10,15,16 38:8,10 41:1 44:25 45:14 46:13 48:5,19 49:16,20,21 50:18 52:23 53:5 55:16,23 57:10,11 58:25 59:1,10,11 60:12 61:15 65:1,25 68:17 69:22,23 70:6,7 77:5 80:10,13 82:2 85:7 89:15 89:19 90:9 92:7 92:10 93:12 95:1 107:9 <b>correctly</b> 76:22 78:15 <b>Council</b> 12:25 <b>counsel</b> 2:2 43:1,7 51:23 74:17 75:16 81:18 99:23 105:7 107:12 <b>counseling</b> 11:14 11:17 20:18 71:20 78:8 80:16 81:12 85:6,22 86:3,5,6 86:23 98:25 99:8,9,11 100:14 101:1 102:9 103:12 104:25 <b>counsellor</b> 96:10 <b>counselor</b> 85:20 85:22,25 98:19 103:1 <b>counselors</b> 71:17 72:7 <b>counting</b> 45:10 48:14 57:13,14	75:16 <b>County</b> 4:4 26:11 31:1 60:15 106:4 107:3 <b>couple</b> 4:24 7:12 31:10 <b>course</b> 7:20 21:7,8 23:23 43:12 <b>court</b> 1:1 4:8,9 5:4,10 26:9,21 26:24 27:11 29:19 31:1 32:5 39:13 41:14 44:3 51:2 67:21 75:5,21 90:14 93:20,21,22,25 94:3 95:24 <b>Court's</b> 40:20 41:24,25 42:2 43:18 44:1 52:3 55:5 74:17 <b>courtroom</b> 60:16 <b>cover</b> 18:18 19:6 <b>covered</b> 34:16 <b>covers</b> 19:3 <b>create</b> 42:4 <b>criminal</b> 67:19,21 <b>crux</b> 18:23 <b>CSC</b> 43:2 <b>current</b> 8:3 <b>custodians</b> 39:6 40:7 43:19 <b>custody</b> 39:5 40:11 <b>cut</b> 25:21 26:1 <b>cutoff</b> 40:19
<b>D</b>				
<b>D</b> 2:14 <b>d/b/a</b> 1:10 <b>damage</b> 18:25 <b>dash</b> 49:25 58:9 <b>date</b> 1:23 26:24 27:8,11 30:21 36:6,8,10 37:2				

37:11 38:6,9,11 40:19 44:17,18 44:21,23 45:1 55:24 59:17 <b>Dated</b> 107:14 <b>dates</b> 75:23 <b>DAVID</b> 1:9 2:13 <b>David.harvey@...</b> 2:14 <b>day</b> 37:24 38:2 80:7 106:10 107:14 <b>day-to-day</b> 17:18 <b>days</b> 25:21 <b>deal</b> 39:24 51:13 69:16,21 80:6 <b>dealing</b> 12:2 <b>deals</b> 9:16 68:19 <b>dealt</b> 32:3 <b>debate</b> 12:7,13 <b>debris</b> 9:8,11 <b>December</b> 40:19 43:22 106:21 <b>decide</b> 31:5 66:18 92:5,8 <b>decided</b> 83:1 98:18 <b>decides</b> 28:9 83:4 85:16,18 98:13 99:1 100:15 <b>decision</b> 28:20,23 29:13,21,21 33:15 52:6 61:25 62:8 63:17,23,24 79:16 90:7 98:7 100:14 <b>dedicated</b> 70:17 <b>defend</b> 70:14 <b>Defendants</b> 1:17 <b>definition</b> 77:19 78:2,18,22 102:3 <b>degree</b> 11:2,3 <b>delineated</b> 15:24	75:15 <b>demolition</b> 24:5 <b>DEO</b> 1:10 <b>department</b> 12:12 12:17,21 13:20 21:23 23:12,15 23:16,19 24:2 24:18,21 28:2,8 28:15 29:1,5,13 32:11 33:7,16 33:24 34:15 35:19 56:21,22 60:8 63:16 66:3 67:22 68:14,25 71:23 72:3,17 73:25 76:24 81:23 83:19,23 87:8,14,22 88:12,20 89:22 90:3,13 92:3 93:3 100:6 <b>depend</b> 92:2 <b>Depending</b> 15:15 <b>deposed</b> 36:18 <b>deposition</b> 1:19 4:1,6,24 6:6,24 7:9,23 35:24 42:12 51:22,23 75:10,19 107:8 <b>depositions</b> 7:6 <b>desire</b> 86:1 <b>detail</b> 39:22 <b>detailed</b> 28:12 <b>detected</b> 25:16 <b>deter</b> 103:22 <b>determination</b> 32:7 34:14 80:7 84:3,20,23 101:12,20 <b>determinations</b> 30:12 70:9 <b>determine</b> 27:12 27:20 36:10 51:7 71:3 81:22 81:23,24 82:12	94:7 <b>develop</b> 22:16 <b>development</b> 73:5 <b>device</b> 50:22 <b>differ</b> 19:17 <b>difference</b> 80:19 80:22,24 101:7 <b>different</b> 8:19 36:2 46:18 51:8 51:9 57:20 71:5 74:20,22 80:1,2 <b>difficult</b> 85:19 <b>difficulty</b> 52:5 <b>diploma</b> 18:8 20:1 70:8 71:3 89:11 89:12 <b>direct</b> 3:3 4:16 28:25 29:7 31:11 60:10,16 90:15 91:7 <b>directed</b> 22:15 31:8 32:18 64:14 <b>direction</b> 29:9 92:3 <b>directions</b> 31:14 <b>directive</b> 58:15 59:3,5 62:15,19 63:1,8 64:25 65:4,10 66:24 67:6 <b>directly</b> 33:24 56:11 <b>director</b> 76:19,24 <b>disagree</b> 41:22 42:1 43:25 52:13 64:21 <b>disagreement</b> 42:3 74:15 <b>disagreements</b> 44:2 74:19 <b>discovery</b> 75:22 <b>discrepancy</b> 57:18,22 <b>discretion</b> 66:11	<b>discuss</b> 42:11 59:12 72:23 <b>discussed</b> 88:2 <b>discussing</b> 44:19 <b>discussion</b> 13:4,8 60:1 <b>displayed</b> 65:23 <b>distinct</b> 15:4 <b>distributed</b> 34:22 <b>DISTRICT</b> 1:1,1 <b>division</b> 1:2,16 8:14 9:3 13:14 13:15,19,20,24 14:2 17:6,19 23:6 41:7 71:15 81:8 100:1 <b>doctor</b> 91:14,25 92:6 93:13 94:14 103:2 104:23,25 <b>doctor-patient</b> 69:10 <b>document</b> 45:2,5 51:7,8 52:17 58:5,23 61:10 76:5,7,15 79:5 79:12 <b>documents</b> 7:22 41:11,17,23 43:1,9,14 74:4,9 <b>doing</b> 32:25 91:24 <b>double</b> 48:22 <b>doubt</b> 45:4,9 66:7 66:9 <b>dozen</b> 7:5 16:14 <b>Dr</b> 86:24 <b>drafting</b> 60:18 <b>drew</b> 11:5 <b>drug</b> 90:18 <b>duly</b> 4:13 106:8 <b>duties</b> 15:18 76:20 77:4,9 <b>duty</b> 27:12	<b>E</b> 107:1,1 <b>e-mail</b> 40:24 41:2 41:4 50:15,19 51:9 52:7,25 53:2 54:11,14 55:8,10,11,21 56:3,4,5,6,10,12 56:15 57:2,25 58:1 <b>e-mailed</b> 52:19,23 <b>e-mails</b> 55:4 <b>earlier</b> 37:21 41:25 45:18 49:3 50:14 57:15 58:2 100:16 101:2 <b>early</b> 41:12 <b>easily</b> 42:16 <b>east</b> 2:12 15:11,15 <b>easy</b> 83:20 84:2 <b>education</b> 19:18 <b>educational</b> 10:24 18:5 19:16 <b>effect</b> 63:11 <b>efficient</b> 43:15 <b>effort</b> 52:4 102:22 <b>efforts</b> 6:17,22 77:14 78:11 86:12 102:11,15 <b>eight</b> 45:11 <b>eighth</b> 46:10 <b>either</b> 20:24 26:5 30:25 48:24 88:5 93:17 <b>elected</b> 9:24 <b>eleven</b> 42:25 <b>eliminate</b> 78:13 <b>Email</b> 2:5,6,10,14 2:15 <b>emanates</b> 21:4 <b>embrace</b> 95:10 <b>embraced</b> 70:4 71:4 <b>emphasized</b> 61:16 <b>emphasizes</b> 61:10
---	---	--	---	--

<p><b>employee</b> 11:6 107:11 <b>Empowerment</b> 8:6,7,8,20 9:2 9:20 10:19 <b>enabling</b> 74:14 <b>enacted</b> 6:12 12:7 74:5 <b>enactment</b> 12:14 <b>encourage</b> 96:23 <b>encouraging</b> 95:10 <b>endorsing</b> 96:4 <b>enforce</b> 22:22 68:22,24 71:16 71:19,23 73:8 73:19 76:21 77:5 80:12 <b>enforced</b> 49:20 72:25 73:1 <b>enforcement</b> 3:6 3:8 8:8,19,23 9:5,14,15 12:10 12:17 13:10,13 13:14,16,17,19 13:23 14:7 16:3 17:6 22:21 23:15 25:10 26:13 27:16,18 28:6,9,21 29:3,5 29:12,14 31:22 33:4,17 34:11 41:6 43:6 59:15 60:11 68:13,19 71:15 72:15,17 73:6,8 76:25 81:8 89:8,14 90:6 92:14,22 93:6,16 94:11 94:19,23 100:1 101:21 <b>enforcer</b> 15:21 19:24 20:5 21:17 46:17 89:20,25</p>	<p><b>enforcers</b> 14:24 14:25 15:10 16:3,10 18:6 19:13,20 20:9 20:12 22:1,4 30:13,14 32:11 44:13 45:7,16 45:19 46:4,20 46:25 49:6 52:22 54:3 65:24 66:8,10 69:16 72:5 73:18 89:7,10 <b>enforces</b> 72:3 <b>enforcing</b> 13:3,5 15:5 16:7 68:16 72:6 77:9 78:20 79:5 80:9 81:9 81:20 82:4 93:4 100:2 <b>engage</b> 94:23 <b>engaged</b> 96:8 <b>engages</b> 104:25 <b>engaging</b> 93:13 <b>enhancement</b> 1:16 8:9,19,25 9:7,10,12,16 13:15 14:7 15:3 <b>enter</b> 31:11 <b>entitled</b> 43:2 <b>entrusted</b> 12:17 68:23 78:20 <b>entry</b> 46:14,15 47:10,15 49:13 49:23 <b>equivalent</b> 18:8 20:1 <b>ESQUIRE</b> 2:5,6 2:10,13,14 <b>everybody</b> 46:16 46:17 <b>evidence</b> 31:19 103:21 <b>exact</b> 30:20 53:18 59:17</p>	<p><b>exactly</b> 53:17 60:3 <b>exam</b> 18:16,18,23 19:3 <b>EXAMINATION</b> 3:3 4:16 <b>example</b> 25:17 33:12 82:21 84:4,12 85:5,8 86:8,10 87:19 88:1,7,23 90:19 94:13 95:2 96:6 98:15 99:12 104:22 <b>examples</b> 32:3 33:13,14 101:7 <b>exception</b> 61:14 62:1,9 <b>exhibit</b> 3:5,7,10 44:4,7,8,8 45:2 45:12 49:2,12 51:9,16,21 52:18 57:4,7,8 57:12,24 76:3,6 <b>EXHIBITS</b> 3:4 <b>existence</b> 43:11 69:18 <b>experience</b> 11:20 72:6 75:17 101:22 <b>expertise</b> 70:23 72:6 101:13,22 <b>Expires</b> 106:21 <b>exploratory</b> 100:18 <b>explore</b> 74:14,17 75:4 <b>exploring</b> 70:5 71:6 98:3,6 101:10 <b>express</b> 73:14 <b>expressed</b> 73:7,16 95:5 <b>expression</b> 78:12 102:13 <b>extent</b> 51:7 83:13</p>	<p>83:14 <hr/><b>F</b><hr/><b>F</b> 107:1 <b>fact</b> 59:7 62:16 <b>factors</b> 97:17 <b>facts</b> 31:4 84:16 88:14 90:14 91:9 <b>fair</b> 16:15 45:19 59:2 67:11 72:5 72:10 <b>familiar</b> 56:9 <b>family</b> 20:14 <b>far</b> 43:9,16 52:2 70:12 73:5 102:18 <b>fashion</b> 34:25 <b>fault</b> 57:19 <b>Fax</b> 2:4 <b>feel</b> 5:13 84:2,11 84:22 91:23 95:23 96:7 103:3 104:24 <b>feelings</b> 78:14 <b>felt</b> 66:12 <b>female</b> 79:18,23 81:4,4 82:22,22 82:25 83:5 85:5 85:7,12,17,25 86:6,7 93:15 95:5 96:21 102:23 <b>fencing</b> 24:8 <b>FF</b> 106:20 <b>field</b> 11:15,18,24 12:3 <b>fields</b> 20:23 <b>files</b> 87:4 <b>financially</b> 107:13 <b>fine</b> 13:21,22 55:16 94:1 <b>finish</b> 16:16 <b>finite</b> 10:11 <b>first</b> 4:13 10:25</p>	<p>12:16 15:22 28:2 34:15 44:14 45:11 46:11 47:10,10 47:15 48:9 53:8 54:13,24 77:11 78:6 79:7 90:8 92:6,9 102:7 103:8 <b>five</b> 9:21 77:21 102:5 <b>flexible</b> 74:13 <b>Florida</b> 1:1,14,24 2:3,8,12 4:3,5 106:3,20 107:2 107:6 <b>folks</b> 25:11 30:5 <b>follow-up</b> 62:24 <b>following</b> 17:9 76:21 <b>follows</b> 4:14 <b>football</b> 96:7 <b>foreclosure</b> 24:6 <b>foregoing</b> 107:8 <b>foreseeable</b> 10:15 <b>form</b> 29:25 61:1 62:3 65:9 71:7 82:8 83:12 86:14 88:23 97:3 103:14,20 <b>formal</b> 12:22 <b>formalize</b> 43:9 <b>FORMAN</b> 2:7 <b>forty</b> 16:20 45:19 46:3 <b>forty-five</b> 16:20 45:19 46:3 <b>forward</b> 94:10,24 <b>found</b> 59:23 <b>foundation</b> 62:4 <b>four</b> 48:14 <b>Franklin</b> 1:23 4:3 <b>frankly</b> 42:5 74:14 <b>fresh</b> 77:25</p>
---	---	--	--	--

<p><b>Friday</b> 7:10 41:5 53:3,4,15 54:7 55:15,17,22 <b>front</b> 27:9 87:21 <b>fulfill</b> 45:24 <b>full</b> 4:18 <b>fully</b> 69:6 <b>function</b> 23:1 <b>further</b> 25:22,23 41:15 88:13,20 107:11 <b>future</b> 10:15</p> <hr/> <p style="text-align: center;"><b>G</b></p> <p><b>G</b> 2:5 <b>GANNAM</b> 2:6 <b>gate</b> 24:8 <b>gather</b> 31:18 <b>GED</b> 18:9 <b>gender</b> 6:21 70:3 71:4,6 78:10,12 78:12,14,18,23 79:2,20 80:2,18 80:20 81:3,14 82:1,6 83:10 85:15,16,17,24 85:25 86:11 95:5,14 96:20 99:11 102:11,12 102:12 <b>general</b> 75:9 <b>generally</b> 18:17 38:18 <b>gentlemen</b> 48:24 <b>getting</b> 17:9 21:17 80:8 88:9 91:17 102:19 105:5 <b>GICE</b> 6:21 <b>girl</b> 84:13 86:25 95:3 98:2,7,24 99:17,19 100:14 100:23 101:9 <b>gist</b> 53:20 <b>give</b> 5:22 24:3 30:20 51:10</p>	<p>83:16 85:3 91:8 94:13 <b>given</b> 30:5 44:18 65:16 66:6,11 95:11 107:10 <b>giving</b> 75:20 103:22 <b>GLORIA</b> 1:10 <b>go</b> 13:13,14 22:1 26:11,19,19,21 28:25 30:3,22 30:23,24,25 31:18 32:4,21 33:9,20 42:21 47:5 50:25 51:10 52:6 61:5 67:21 75:7 82:3 82:11 86:2,5 89:11,13,17,24 90:5 91:8 93:7 93:21,22 98:19 99:5 103:25 <b>goal</b> 78:9 80:17 81:13,15,25 82:4,5,11,14 83:6,10 86:1 102:10 <b>goes</b> 26:20,22 85:6,20 93:20 93:25 98:10,25 <b>going</b> 5:3 12:17 13:5 21:17 22:11,22 23:11 24:6 25:4 28:1,7 28:14,18,24,25 29:4,6,7,8,24 31:15,19 33:2 39:21 41:14 51:10 52:7 55:3 56:8 65:8 67:3 67:11,19 68:9 70:14,22 75:7 83:1,18 84:15 84:18 87:6,7,13 87:17,21 90:13</p>	<p>91:18,19 97:25 98:13 99:1 100:4,5,7,17 104:15 <b>good</b> 4:18,21 70:19 103:3 104:24 <b>gotcha</b> 57:21 <b>grade</b> 10:25 <b>grass</b> 19:1,6 23:18 25:21 26:1 33:6 69:18 <b>Great</b> 5:17 6:6,24 40:5 <b>ground</b> 4:24 5:9 <b>guess</b> 32:2 43:3 <b>guidance</b> 32:1 33:19 <b>guided</b> 99:23 <b>guidelines</b> 72:15 <b>guy</b> 91:8 <b>guys</b> 16:4,6</p> <hr/> <p style="text-align: center;"><b>H</b></p> <p><b>H</b> 1:9 <b>half</b> 15:10,10 16:14 <b>hand</b> 4:9 106:10 <b>handed</b> 42:25 43:5 44:6 52:17 76:5 <b>handle</b> 23:9 24:20 90:13,24 <b>handled</b> 58:22 <b>handles</b> 9:5 60:15 <b>handwritten</b> 43:2 <b>happen</b> 17:15 22:17 29:12 30:18 33:24 92:13 <b>happened</b> 30:22 32:17 33:3 59:19 86:21 90:1 <b>happens</b> 92:21</p>	<p>93:5,16,18 <b>happy</b> 39:15 <b>hardworking</b> 70:14,15 89:14 <b>Harry</b> 21:2 23:21 29:24 39:12 55:1 <b>HARVEY</b> 2:13 <b>hash</b> 17:15 <b>he'll</b> 17:14 <b>head</b> 5:2,13 21:22 27:3 66:3 68:3 68:13 69:9 81:8 93:3,24 100:1 <b>health</b> 11:15,18 20:10 69:22 71:17,20 72:7,8 <b>heard</b> 73:13,21 87:2,3 <b>hearings</b> 39:8 <b>HEARTS</b> 1:10 <b>help</b> 14:10 17:3 37:1 55:2 63:10 85:18,22,23 86:1 95:19 98:11,12 99:19 103:5 104:25 <b>helped</b> 86:25 <b>helpful</b> 105:11 <b>hereinafter</b> 4:14 <b>hey</b> 30:25 31:18 32:20 34:5 63:8 98:7 <b>high</b> 11:1 18:7,8 20:1 70:8 71:2 89:10,12 <b>Hillsborough</b> 4:4 26:11 31:1 60:15 <b>Hmihet@lc.org</b> 2:5 <b>hold</b> 11:3,11,14 18:11 19:13 <b>honest</b> 42:3 <b>Hopefully</b> 74:15</p>	<p><b>hoping</b> 41:17 <b>Horatio</b> 2:5 4:22 <b>hours</b> 7:12 <b>house</b> 24:4 26:17 <b>Housing</b> 68:20 <b>human</b> 11:7,8,9 11:12 <b>hypothetical</b> 71:8 71:9,9 83:13,14 85:1 86:16 92:24 103:16 <b>hypotheticals</b> 91:17,18</p> <hr/> <p style="text-align: center;"><b>I</b></p> <p><b>idea</b> 24:3 <b>ideas</b> 98:6 <b>identification</b> 3:5 3:8,10 44:4 51:16 76:3 81:3 <b>identified</b> 46:16 58:2 83:1 85:14 <b>identifies</b> 86:7 99:19 100:23 101:9 <b>identify</b> 47:7 71:4 79:17,23,24 86:22,25 98:2 98:14 100:14 <b>identity</b> 6:21 70:3 70:4 71:6 78:10 78:12,19,23 79:2,20 80:3,18 80:20 81:14 82:1,6 83:10 85:15,16,24,25 86:11 95:5,11 102:11,12,18 <b>implied</b> 74:24 <b>import</b> 30:1 <b>important</b> 5:5,11 80:18 <b>imprecise</b> 97:3 <b>improper</b> 71:8 85:1 86:15</p>
---	--	--	--	--

<p>91:18 103:15 <b>in-box</b> 50:20 <b>include</b> 20:5 64:25 99:9 <b>including</b> 19:25 22:4 78:11 102:11 <b>incomplete</b> 71:9 83:14 86:15 103:16 <b>indefinite</b> 10:12 10:13 <b>INDEX</b> 3:1 <b>indication</b> 75:21 <b>individual</b> 21:16 79:17,22 <b>individual's</b> 78:10 80:17 81:14,25 102:10 <b>individually</b> 1:8,9 1:11 <b>individuals</b> 15:4 78:14 <b>inform</b> 103:25 <b>information</b> 23:21 89:21 <b>infraction</b> 34:2 <b>initial</b> 32:7 33:15 90:2 <b>initially</b> 88:11 <b>innocuous</b> 39:20 42:5 <b>input</b> 12:9 <b>inquire</b> 39:24 <b>inspection</b> 67:18 <b>inspector</b> 18:15 19:25 20:2 27:15,20 30:24 47:6,9,22 48:4 48:13 <b>inspector's</b> 19:12 <b>inspectors</b> 14:10 14:21 16:22 19:17 20:6 22:5 38:21 47:4</p>	<p>48:17 69:5 70:15 73:22 <b>instance</b> 1:20 4:6 29:9 <b>instances</b> 27:10 29:11 30:17 31:7 32:9 <b>instruct</b> 104:9 <b>instructing</b> 30:12 63:15 <b>instruction</b> 35:18 66:17,23 67:5 <b>insult</b> 71:1 <b>intelligence</b> 71:1 <b>intendant</b> 66:1 <b>intended</b> 5:22 <b>interaction</b> 12:2 <b>interchangeable</b> 15:18 <b>interchangeably</b> 78:8 102:8 <b>intercourse</b> 103:3 <b>interested</b> 107:13 <b>INTERNATIO...</b> 1:10 <b>interpretation</b> 43:25 <b>interview</b> 89:4,17 90:2 91:13,14 91:25 92:5,9 <b>investigate</b> 22:6 <b>investigation</b> 28:25 89:2 90:15 91:15 <b>investigator</b> 28:16 29:7,8 <b>investigators</b> 24:20 <b>involved</b> 9:12 12:6,12 23:20 24:7,23 25:2 69:13 73:4 80:7 80:8,9 83:19,23 85:20 86:17 94:5 97:5 100:7</p>	<p><b>involvement</b> 60:18 <b>iPhone</b> 51:24,25 57:20 <b>irrevocable</b> 93:7 <b>issuance</b> 49:25 58:9,18 61:20 64:3 65:6 67:16 67:23 68:5,25 94:25 <b>issue</b> 17:14 25:9 25:20 27:21 31:22 32:21 33:9 41:18 51:19 59:12,14 59:15 63:8 <b>issued</b> 25:13 26:22 27:12,14 28:10 29:23 30:14 31:25 32:9 61:23 92:12 93:6,11 <b>issues</b> 9:5,12 11:21 12:10 13:9 17:11 20:10,13,17 24:7 69:5,8 85:20 <b>issuing</b> 92:18 94:8 94:11</p> <hr/> <p style="text-align: center;"><b>J</b></p> <hr/> <p><b>J</b> 48:7 <b>Jack</b> 48:2 <b>Jake</b> 17:21 <b>Jerrod</b> 2:14 22:25 28:23 31:16 35:6 43:6 59:6 63:4,7,8,15 72:21 <b>Jerrod's</b> 39:10 <b>Jerrod.simpson...</b> 2:15 <b>Jerry</b> 47:12 <b>Jo</b> 48:7</p>	<p><b>job</b> 19:9 31:17 70:19 <b>judge</b> 39:6 43:11 75:12,15 95:24 104:6 <b>jump</b> 31:24,24 <b>justice</b> 11:3</p> <hr/> <p style="text-align: center;"><b>K</b></p> <hr/> <p><b>Kennedy</b> 2:12 <b>kerfuffle</b> 42:4 <b>Kevin</b> 48:23 <b>kind</b> 9:6 11:24 17:2 21:17 22:1 22:10 32:1 36:15 45:23 69:8 84:21 94:15 95:19 98:2 105:2 <b>kinds</b> 24:1 69:13 <b>knew</b> 36:10 <b>know</b> 6:2,16,19,20 9:6 11:5 14:11 15:13 17:3,7,8 17:10,12,13,17 18:16,21,21,24 21:6,21,23 23:9 23:12,17 24:4,9 24:9,15,22,24 25:21 26:17 27:6 28:11 30:21,21 31:8,9 31:10,11,14,15 31:19 32:1,5,16 32:24 33:4,19 33:20 34:20,21 34:24 36:13,20 36:21,23,24 37:7 38:20 39:8 40:1,5 41:12,19 44:9 48:24 51:1 51:6 53:21 54:9 54:15,17 55:14 56:2 57:17 58:20,20 59:5</p>	<p>59:17 60:19 63:2 64:9 65:3,4 67:20 68:11 69:12,13,24 70:2,10 72:19 73:4,15,19 77:7 80:8,11,19 81:11 86:21 87:3,16 90:21 92:24,24 93:2 94:18,22 96:6 97:4,15,15,16,17 97:17 100:9 102:25 103:10 104:15 <b>knowing</b> 36:18 <b>knowledge</b> 12:15 35:10 50:18 79:6</p> <hr/> <p style="text-align: center;"><b>L</b></p> <hr/> <p><b>L</b> 1:8 106:6,19 <b>lack</b> 11:21 62:4 <b>lady</b> 103:19 <b>large</b> 4:3 107:6 <b>law</b> 83:15 <b>lawsuit</b> 4:23 6:13 11:25 <b>lawyers</b> 74:23 104:5 <b>leadership</b> 13:24 <b>leads</b> 5:9 <b>learn</b> 12:16,20 <b>leave</b> 10:14 <b>legal</b> 3:6 12:21 18:21 22:15 23:11,16,19 24:2,17,21 28:1 28:8,15 29:1,5 29:13 30:5,11 30:15 32:10 33:7,16,24 34:15 35:19 43:3 49:25 56:21 58:8,17</p>
--	--	---	--	--

60:8,10,17,23 62:2,9 63:2,9,16 63:18 64:2 65:6 65:21 67:15,22 67:25 68:4,11 68:12,25 83:19 83:23 84:16 87:8,13,22 88:12,19 89:1,2 89:22 90:3,7,13 92:3,6,9 99:23 100:5 <b>legally</b> 42:5 <b>legislative</b> 10:6 <b>let's</b> 42:22 43:23 51:13 57:4 76:1 79:7 82:21,24 85:8 86:2 95:2 <b>letter</b> 24:12 25:20 27:4,5 94:14,17 94:18 <b>LGBT</b> 11:21 <b>LIBERTY</b> 2:2 <b>licensed</b> 98:10 103:1 <b>licenses</b> 18:12 <b>licensing</b> 11:14 19:14,16 <b>lie</b> 82:17 <b>life</b> 97:25 <b>light</b> 62:16 <b>limited</b> 78:11 102:11 <b>line</b> 21:3 23:10 55:1 <b>list</b> 39:10,11,11 40:6 <b>listen</b> 29:8 30:14 <b>literally</b> 40:20 <b>little</b> 13:18,23 15:16 23:19 24:3 <b>live</b> 83:5 <b>lived</b> 85:14 <b>living</b> 9:5 17:10	18:20 <b>LLP</b> 2:7 <b>LMFT</b> 1:8,9 <b>load</b> 15:12 <b>lock</b> 24:8 <b>long</b> 5:25 6:3 9:19 10:22 53:24 72:19,19 <b>longer</b> 86:7 105:1 <b>look</b> 18:24 30:25 31:4 34:5,6 35:23 36:4,6 40:18 44:8 46:2 50:21,23 51:24 54:8,18,19 57:3 57:20 76:7 77:11,19,21 82:11,19 96:6 102:2,21 <b>looked</b> 33:5,5 35:14 37:11 38:7 40:17 49:4 49:7 50:2,4 57:8 57:17 58:3,12 <b>looking</b> 11:8 32:23 33:21 36:9 37:1 49:2 55:21 65:12 68:12,12 77:12 82:4 84:21 99:7 <b>looks</b> 57:13,20 <b>lot</b> 18:23 32:12 97:16 <b>Lynn</b> 107:5,21 <hr/> <b>M</b> <hr/> <b>magistrate</b> 26:10 26:19,20,22 27:9 31:2,6 39:6 43:11 75:12 93:21 94:5 <b>magistrates</b> 26:12 <b>major</b> 10:21 <b>make-up</b> 45:23 <b>making</b> 17:10	30:12 63:23 74:23 85:1 96:15 99:5 103:18 <b>male</b> 79:18,24 81:4,5 83:1,2 85:6,14,15,24 86:7 95:11,11 96:9,25 <b>man</b> 86:20 <b>management</b> 11:4 <b>manager</b> 1:15 8:5 9:19,25 10:18 14:3,14 21:22 <b>managing</b> 14:11 <b>mandated</b> 103:24 <b>mandatory</b> 45:15 65:24 66:8 <b>mark</b> 49:14 <b>marked</b> 3:5,7,10 44:4,7 51:16 52:18 76:3,6 <b>master's</b> 11:3 <b>match</b> 83:10 85:17 <b>materials</b> 34:22 72:16 <b>math</b> 16:19 45:12 <b>matter</b> 12:25 18:17 94:10,24 100:6 <b>matters</b> 24:1 32:4 <b>mayor</b> 10:3,4,7,8 18:4 <b>McLeish</b> 46:21 <b>mean</b> 20:5 23:17 27:25 29:21 30:20 32:12 36:20 39:21,22 54:9 59:18 61:19 62:11 69:9 70:13 71:1 78:19,25 79:7 79:21 87:6,8 89:12 90:20	94:18 <b>meaning</b> 7:18 63:24 82:9 <b>means</b> 28:24 53:12 60:21 61:13 78:8 81:12 102:8 <b>mechanics</b> 42:20 <b>meet</b> 24:25 <b>meeting</b> 3:6 7:15 7:25 12:22 43:3 43:5 45:6,15,21 59:20 <b>meeting-me</b> 7:13 <b>member</b> 41:6 <b>members</b> 1:11 <b>Memories</b> 55:20 <b>memos</b> 72:16 <b>mental</b> 11:15,18 20:10 69:22 71:16,20 72:7,7 85:20 <b>mentioned</b> 52:24 <b>message</b> 54:11,13 <b>met</b> 7:10,13 <b>middle</b> 1:1 49:8 <b>Mihet</b> 2:5 3:3 4:17,22 7:20,21 8:21,22 16:18 21:8,9 23:24,25 29:20 30:7,8 34:3,9 39:1,19 40:1,5,10,14,16 40:21 41:9 42:9 42:14,18,22 43:24 44:5 50:25 51:4,5,18 52:11,13,16 54:22 55:7 59:15,21,24 60:2,5 61:3,4,9 62:7 64:1,7,11 64:15,17,20,22 64:23 65:15 70:16,18,20	71:14 74:20 75:2,18 76:4 78:3,5 79:11,15 79:19 82:10 83:21,24 84:1 84:10 85:8,10 86:18 87:10 88:4,21 92:1,4 92:17 95:7,8,13 95:25 96:2,18 96:19 97:7,10 98:21 99:14,25 100:8,11 101:19 102:1 103:8,11 103:17 104:3,13 104:16,18 105:5 105:9 <b>Mike</b> 48:22 <b>mind</b> 36:13,16 38:2 45:4 77:25 <b>mine</b> 70:24 75:3 <b>minute</b> 53:25 77:24 <b>minutes</b> 42:24 91:22 <b>misunderstandi...</b> 52:5 <b>misunderstood</b> 30:10 <b>mobile</b> 50:22 <b>mode</b> 69:25 72:2 <b>modes</b> 71:24 <b>morning</b> 4:18,21 4:23 <b>mouth</b> 66:24 67:6 <b>move</b> 42:7 51:13 52:4 94:24 <hr/> <b>N</b> <hr/> <b>nah</b> 99:1 <b>name</b> 4:19,21 9:2 37:18 40:6 46:6 47:23 48:12 <b>names</b> 38:15 46:2 46:19
--	---	--	---	--

<p><b>narcotics</b> 90:21 91:3 <b>narrow</b> 43:25 44:1 <b>necessarily</b> 30:7 65:11 <b>necessary</b> 42:11 52:8 77:7 <b>need</b> 6:1 20:1 24:12 27:8 31:18 32:21 33:9 36:15 41:20 42:17 55:14 85:22,22 85:23 89:2 90:14,14 <b>needs</b> 26:17 85:18 88:19 <b>neighbor</b> 86:19,20 87:1 89:17 97:18 <b>Neighborhood</b> 1:16 8:5,7,8,9 8:18,25 9:2,7,10 9:12,16,20 10:18 13:15 14:7 <b>neither</b> 39:23 <b>never</b> 7:13 58:23 69:4 <b>nevertheless</b> 43:14 <b>new</b> 1:10 56:4 <b>nods</b> 5:2,14 27:3 68:3 93:24 <b>normal</b> 90:16,17 <b>normally</b> 65:17 <b>North</b> 1:23 4:3 <b>Nos</b> 3:5 44:4 <b>Notary</b> 4:2 106:20 107:5,21 <b>notice</b> 4:5 25:9,12 27:2,11,13,22 28:9 29:23 30:13 31:23</p>	<p>32:8 50:1 58:9 58:18 61:20,23 64:3 65:6 67:16 67:24 68:5 69:1 92:11,18 93:5 <b>November</b> 106:11 107:14 <b>number</b> 5:3 24:19 24:24 43:4 <b>numbered</b> 57:14</p> <hr/> <p style="text-align: center;"><b>O</b></p> <hr/> <p><b>o'clock</b> 1:25 105:14 <b>OATH</b> 106:1 <b>object</b> 29:24 61:1 62:3 65:8 70:11 71:7 82:8 83:12 91:19 103:14 <b>objection</b> 30:1 65:13,16 84:6 84:24 86:13 87:5 88:17 91:16,19,20 92:15 95:12,22 96:13,15 97:1 98:16,17 99:3 99:21 101:16,23 103:7 <b>objections</b> 88:3 91:21 103:19,20 104:6 <b>obligated</b> 41:23 <b>obligation</b> 44:1 <b>observe</b> 69:17 <b>obtain</b> 21:5 22:1 45:24 <b>obviously</b> 41:10 52:13 53:20 74:2 <b>occurred</b> 29:22 32:8 37:3 38:3 81:24 82:13 94:7 <b>October</b> 1:23</p>	<p>42:25 43:21 55:24 <b>offensive</b> 70:12 <b>officer</b> 7:3 89:8,14 <b>officers</b> 73:8 101:21 <b>official</b> 1:15 27:16 28:6,9 33:4,17 94:19 106:10 <b>officials</b> 31:22 34:12 <b>Oh</b> 7:7 25:11 50:10 68:1 96:14 99:4 <b>okay</b> 5:1,7,15 6:4 6:18,22,23 7:5,8 7:11,14,17 8:14 9:16,19 10:14 10:17,24 11:11 12:2,16,22 13:1 13:6,7,8 14:4,14 15:2,24 16:10 16:22 17:5,20 18:11 19:1,5,8 19:12,16,24 20:4,7,20 21:1 21:20,25 22:4 22:12,13,18,24 23:4,8,24 24:11 24:14 25:6 26:2 26:8,10,12,25 27:7,10,18,24 28:3,20,23 29:11 30:4 31:3 31:13 32:2,13 32:15,23 33:1,3 33:11,14,23 34:10,19,25 35:5,11,15,17,23 36:9,22 37:1,5 37:23 38:4,7,23 39:19 40:1,14 40:20 41:4,9 42:14,18 43:24 44:16,19 45:10</p>	<p>46:2,14,23,25 47:7 48:6,14 49:2,9,17 50:12 50:16,19,22 51:10,12 52:10 52:11,24 53:16 53:19,24 54:1,4 54:7,11,16 55:6 55:18 56:12,15 56:20,23,25 57:2,4,23 58:1 58:15,23 59:5,8 59:21,24 60:2,6 60:13,16,18,21 61:3,16,25 62:15,23,24 63:5,13,20 64:7 64:13,15,16,20 65:3,16 66:10 66:22 67:5,9,14 67:23 68:19,21 69:8,11,16 70:2 71:15,19 72:14 72:23 73:3,24 74:7,11 75:2 76:11,15 77:23 78:4,6,17 80:5 80:21,22 81:2,6 81:11,19 82:16 82:18 83:7,8,21 83:24 84:17 85:13 86:4 87:11,15 88:14 88:22 89:1,6,23 90:4,12,22 91:1 91:11,13 92:11 93:1,9,18,25 94:23 95:7,25 96:3 97:19,21 97:23 98:8 99:15 100:8,19 100:21,24 101:12 102:2,6 102:24 103:17 104:1,6 105:5</p>	<p><b>On-the-job</b> 19:10 <b>ones</b> 24:22 46:25 68:23 <b>open</b> 50:6 <b>opened</b> 50:8,13 <b>operate</b> 67:3 69:15 87:17 <b>operates</b> 23:15 <b>operation</b> 8:9 17:7 <b>operations</b> 17:18 <b>opinion</b> 79:3 80:24 83:20 100:18 <b>opposed</b> 21:4 29:13 32:11 33:17 60:7 <b>opposite</b> 70:5 <b>options</b> 98:3 <b>order</b> 5:10 39:7,9 40:20 41:24,25 42:2 43:11,18 51:22 52:4 55:5 75:8,13,15,23 77:8 80:12 81:22 <b>orders</b> 44:2 <b>ordinance</b> 3:11 6:10,11 11:22 12:4,7,10,13,18 13:5,10,13 16:7 16:9 22:7,8,22 24:17 25:1 27:19 29:4 30:11,19 34:13 35:17 45:8 49:6 52:21 59:16 60:19 71:19,21 72:17,25,25 73:9 74:5,5 76:9 77:4,8,17 78:18 78:20,22 80:9 80:15 81:9,11 81:16,20 82:13 83:8 84:5,14</p>
---	---	---	---	--

87:1,12,20 88:2 88:24 93:4 95:9 95:21 96:3,10 96:22 98:15 100:3,16 101:3 102:2 103:13 105:3 <b>ordinance's</b> 86:10 <b>ordinances</b> 71:16 71:23 <b>organizational</b> 11:4 <b>organizationally</b> 17:1 <b>orientation</b> 6:16 78:10,18,23 79:1,2,8,14 80:2 80:17,20,25 81:14 82:1,6 86:11 102:10 <b>original</b> 55:10 <b>originate</b> 62:16 <b>Orlando</b> 2:3 <b>outcome</b> 92:25 <b>OUTREACH</b> 1:10 <b>outside</b> 52:3 55:4 70:22 <b>overall</b> 17:17 <b>overbroad</b> 71:8 <b>overgrowth</b> 25:18 <b>overly</b> 84:25 86:15 101:16,18 103:15 <b>oversee</b> 17:7,13 17:18 24:23 <b>overview</b> 34:13 35:17	47:15 48:9,12 49:11,18,19,21 49:22 58:6 75:10,11,12 76:15 77:12,12 77:21 102:4,5 <b>pages</b> 50:1,4,6,9 57:12,13,14,16 58:2,12 <b>painted</b> 26:17 <b>PALM</b> 106:4 107:3 <b>paper</b> 62:22,25 63:6 64:19 <b>paragraph</b> 75:11 <b>parameters</b> 52:3 74:18 <b>part</b> 11:24 15:19 26:13 46:3 49:7 53:8 <b>particular</b> 9:13 10:11 11:22 13:9 16:7 28:22 33:5 37:24 54:9 54:10 69:18,24 79:22 94:6 <b>partner</b> 79:18 <b>pass</b> 36:14 <b>passed</b> 12:19 22:14,16 59:23 <b>patient</b> 71:3 <b>patients</b> 1:8,9 <b>pay</b> 26:5 93:17 <b>pending</b> 4:7 6:3 <b>people</b> 17:10 32:10 38:16,18 43:4 70:14,17 104:9 <b>perfect</b> 55:20 <b>perform</b> 15:4,5 <b>performed</b> 78:9 80:16 81:13 102:9 <b>period</b> 56:24 <b>permits</b> 9:6	<b>person</b> 28:21 29:14 78:20 79:4 81:20 82:24 86:19,21 89:4 99:10 <b>personally</b> 106:7 <b>Peterson</b> 48:22 <b>phone</b> 12:23 53:13,14 <b>PICKUP</b> 1:9 <b>place</b> 1:23 27:13 27:21 33:16 53:14 55:22 66:5 72:20 73:24 88:15 <b>places</b> 77:4 <b>Plaintiffs</b> 1:12,20 2:4 4:7,22 <b>Plaintiffs'</b> 3:5,7 3:10 44:4,7,7,8 49:12 51:9,16 51:21 52:18 75:9 76:3,6 <b>plans</b> 10:14 <b>play</b> 83:8 91:15 96:6,17 <b>please</b> 4:10,18 6:1 29:18 30:3 44:9 52:12 54:18 56:18 63:10 65:13 84:7 91:23 103:5 <b>PO</b> 2:2,8 <b>point</b> 13:9 70:4 71:4 100:22 101:8 <b>pointing</b> 46:10 49:11,15 <b>police</b> 7:3 10:21 10:21,22 <b>policy</b> 67:11,12,17 <b>portion</b> 29:19 51:20,25 <b>posed</b> 97:3 <b>position</b> 8:3 9:24	10:15,17 41:21 75:3 <b>positions</b> 15:18 <b>possessed</b> 39:5 <b>possession</b> 40:11 91:2 <b>possibilities</b> 69:14 98:3 <b>possibility</b> 94:8,9 94:10 <b>possible</b> 41:13 49:24 58:7,16 60:22 62:1,8 63:9,17 64:1 65:20 82:14 <b>possibly</b> 73:19 <b>power</b> 39:18 <b>PowerPoint</b> 3:6,9 35:2,3,5,7,11,15 35:21,23 36:4 37:1 39:2 40:23 49:3 50:7,8,12 50:17 52:19 55:9 59:7 66:6 74:2 <b>powers</b> 76:20 77:4 <b>practice</b> 77:14 78:8 80:16 81:12 102:9 <b>prefer</b> 80:25 <b>prejudiced</b> 41:15 <b>preparation</b> 7:22 <b>prepare</b> 7:8 36:23 <b>prepared</b> 23:6 59:7 60:17 <b>prepuberty</b> 95:4 <b>present</b> 7:14 34:18,19 38:13 38:16,19 84:16 <b>presentation</b> 35:7 36:4 37:3 39:3 39:18 40:13,23 49:3,5 50:7 51:21 52:19 54:12 55:9	56:19 57:16 65:1 66:6 74:3 <b>preserve</b> 103:20 <b>pretty</b> 15:17 <b>previous</b> 56:6,7 56:13 <b>previously</b> 35:16 43:1 <b>principal</b> 100:2 <b>print</b> 51:25 <b>prior</b> 10:18 11:20 11:21 12:3,7,13 40:19 43:8 44:10 49:25 51:19 57:9 58:9 58:17,24 59:9 59:12,25 61:17 61:19,22 62:17 64:2,16 65:6 67:15,23 68:5 68:25 75:23 <b>private</b> 9:13 <b>privilege</b> 69:10 <b>privileged</b> 103:24 <b>probable</b> 24:25 <b>probably</b> 34:5 38:21 57:19 59:18,19 75:4 <b>problem</b> 17:16 27:6 <b>procedure</b> 32:4 <b>proceed</b> 29:7 30:5 32:18 43:23 52:12 84:7,18 88:13,20 <b>Proceedings</b> 105:14 <b>process</b> 26:5,13 29:12 43:15 92:14,22 93:6 93:16 94:11,24 <b>produce</b> 39:17 41:14,23 43:14 52:6,7 <b>produced</b> 39:3
<hr/> <b>P</b> <hr/> <b>p.m</b> 1:25 43:3 105:14 <b>page</b> 3:2 4:25 28:15 45:11,11 46:11,22 47:10				

41:12 <b>producing</b> 52:10 <b>professional</b> 11:5 11:9,11 18:11 19:14 <b>professionals</b> 72:8 <b>prohibit</b> 83:9 95:9 96:3 <b>prohibited</b> 77:20 84:5 88:24 103:12 <b>prohibition</b> 86:11 102:17 <b>prohibits</b> 77:8 80:12,15 105:3 <b>prompted</b> 36:17 <b>properties</b> 9:13 <b>property</b> 24:8 26:18 31:11 33:6 69:19 <b>prosecute</b> 31:21 <b>prosecution</b> 24:22 31:16 <b>prosecutorial</b> 31:17 <b>prosecutor</b> 90:16 90:17 <b>prove</b> 25:4 <b>provide</b> 21:12 23:4 38:4 42:6 <b>provided</b> 21:13 34:11 44:11 45:7 49:5 52:21 52:24 54:2 56:21 60:6 72:16 <b>provider</b> 77:13 <b>provides</b> 80:11 99:10,11 <b>providing</b> 41:18 <b>provision</b> 76:16 <b>provisions</b> 68:17 <b>public</b> 4:2 9:17 106:20 107:5,21 <b>pull</b> 54:24	<b>purports</b> 83:13 <b>purpose</b> 4:6 75:13 <b>pursuant</b> 4:5 67:16 <b>put</b> 36:13 39:12 62:25 66:24 67:6 87:7,13,21 104:8 <b>puts</b> 60:23 <b>putting</b> 61:11 <hr/> <b>Q</b> <hr/> <b>qualifications</b> 84:21 101:14 <b>qualified</b> 80:4 84:3,11,19 <b>question</b> 5:21,22 6:3 16:16 21:10 29:17,25 30:17 40:4 41:16,22 49:14 54:23 55:6 61:2,7,8 62:15 64:5 65:9 65:14 66:1 67:23 69:2 70:12 71:8,11 78:21,24 81:15 81:17 82:3,8,9 87:23,24,25 88:6 91:23 92:24 93:2 95:24 97:2 100:9 102:15 103:8 104:5 <b>questioned</b> 21:6 <b>questioning</b> 21:3 55:2 98:24 <b>questions</b> 5:18 20:20 25:1 43:23 78:1 104:10 105:10 105:13 <b>quick</b> 105:6 <b>Quite</b> 23:17	<hr/> <b>R</b> <hr/> <b>R</b> 107:1 <b>Rachele</b> 4:2 106:6 106:19 107:5,21 <b>Raise</b> 4:9 <b>Randel</b> 48:12 <b>Rasmussen</b> 47:19 <b>reach</b> 99:16 <b>reached</b> 70:4 99:18 100:13 101:8 <b>reaches</b> 100:22 <b>read</b> 18:16 29:17 29:19 74:25 76:22 77:24 78:6,15 <b>reading</b> 41:25 <b>really</b> 28:4 46:8 56:2,10 66:15 <b>reason</b> 36:9 54:9 54:10 66:7 75:17 <b>reasoning</b> 36:7 <b>recall</b> 12:23 35:22 53:23 63:3,12 63:14,15,19,22 63:23 64:8,18 64:24 73:23 74:10 <b>receive</b> 92:3 <b>received</b> 20:9,13 20:16 22:6,10 35:18 51:8 66:18 <b>receives</b> 28:6 100:14,25 <b>receiving</b> 83:9 98:12 <b>Recess</b> 42:23 51:15 76:2 105:8 <b>recognize</b> 46:7,15 46:19 <b>recollection</b> 37:2 52:9 55:3	<b>recommend</b> 90:3 <b>recommendation</b> 42:6,10 43:13 <b>record</b> 4:19 5:15 30:2 40:2,6 42:20 43:23,24 46:10 49:11 50:25 51:3,10 51:17 58:5 74:13,21 75:9 78:7 85:2 99:6 103:19 105:9 <b>recorded</b> 34:25 <b>recording</b> 35:8 <b>reduce</b> 78:13 <b>refer</b> 6:7,10,15 20:5 66:11 88:12 <b>reference</b> 102:15 <b>referenced</b> 63:9 <b>referral</b> 66:12 <b>referred</b> 49:24 58:8,17,17 60:23 61:22 62:2,9 63:1,18 64:2 65:5,21 66:19,20 67:15 67:24 68:4,24 88:19 <b>referring</b> 13:21 81:16 91:21 <b>refresh</b> 37:2 51:23 52:9 55:2 85:8 <b>regard</b> 74:4 <b>regarding</b> 49:6 52:5,20 <b>regular</b> 19:20 <b>regulate</b> 71:24 <b>regulates</b> 72:3 <b>regulations</b> 72:7 <b>reinspection</b> 25:25 <b>reiterate</b> 43:16 <b>relating</b> 12:10	<b>relations</b> 11:6 <b>relative</b> 107:11 <b>relevant</b> 41:11 52:8 <b>remain</b> 99:1 100:15 <b>remember</b> 36:14 53:18 58:19 60:4 <b>removes</b> 9:8 <b>reparative</b> 78:7 102:8 <b>repeat</b> 5:18,20 86:13 88:3 <b>rephrase</b> 5:18,20 <b>reply</b> 56:5 <b>report</b> 17:20 18:3 107:8 <b>reported</b> 94:15 <b>reporter</b> 4:9 5:5 5:10 29:19 51:2 <b>represent</b> 4:22 <b>request</b> 53:6,10 53:12 <b>requested</b> 29:19 56:18 <b>requests</b> 95:19 97:14 <b>required</b> 18:11 19:13,18 21:25 61:6 103:21 <b>requirement</b> 18:5 19:17 45:24 <b>resolve</b> 41:17 52:14 <b>resources</b> 11:7,8 11:10,12 <b>respect</b> 9:10 13:10 20:16 27:18 29:3 30:11 32:6 44:12 45:8 71:16,20 72:17 <b>respond</b> 56:5 57:2 83:15
---	--	---	---	--

<p><b>responding</b> 53:6 53:10 54:14 55:11 <b>response</b> 24:13 <b>responsibilities</b> 15:5,8 16:7 17:5 76:20 77:5,9 <b>responsibility</b> 25:8 <b>responsible</b> 79:4 <b>result</b> 86:5 <b>retired</b> 10:20 46:21 <b>review</b> 7:22 28:1 28:4,7,8,24 49:25 58:9,17 60:23 62:2,10 63:2,10,18 64:2 65:6,21 67:15 67:25 68:5,25 <b>reviewed</b> 52:20 67:22 <b>Rgannam@lc.org</b> 2:6 <b>right</b> 4:9 9:4 13:8 15:22 21:13 22:17 28:21 44:6 45:12,13 46:9,12 47:8,19 48:1,9,16,18,22 50:7 56:5 57:4,6 61:17 62:18 65:19 67:1 68:14 69:19 70:24 76:1 77:17 81:19 92:20 93:7,11 98:23 99:24 100:16 101:5,10 104:2,11 105:9 105:12 <b>right-of-ways</b> 9:8 9:11,17 <b>Rios</b> 47:17,21 <b>risen</b> 67:20</p>	<p><b>Rob</b> 7:10,15,18,18 <b>ROBERT</b> 1:8 2:10 <b>Roger</b> 2:6 39:7 <b>role</b> 95:14 <b>roles</b> 15:21 16:1 <b>romantic</b> 78:13 <b>routed</b> 24:17 <b>Ruggiero</b> 1:15,19 3:2 4:1,12,20,21 40:22 42:20 43:20 44:6 51:19,20 52:1,9 52:17 64:5 65:14 68:14 73:19 76:5 83:17 85:4 87:2 103:18 105:10 106:7 <b>Ruggiero's</b> 40:6 43:12 51:23 <b>rule</b> 5:10 75:10 <b>rules</b> 4:25 103:21 <b>run</b> 23:11,16 24:1 <b>Rwilliams@bur...</b> 2:10</p> <hr/> <p style="text-align: center;"><b>S</b></p> <hr/> <p><b>safe</b> 17:11 <b>Sal</b> 1:15,19 3:2 4:1,12 51:12 106:7 <b>Salvatore</b> 4:20 <b>Sansone</b> 39:6 75:15 <b>Sansone's</b> 43:11 75:13 <b>saw</b> 57:5 <b>saying</b> 5:4 25:20 27:5 64:18 75:24 94:14 96:6 97:2 <b>says</b> 31:18 49:14 49:23 56:18,25 58:6,7 60:22</p>	<p>61:19 65:20 66:21 75:1,1 76:19 78:7 81:11 85:21,25 86:20 87:2 89:2 102:7 103:2 <b>scenario</b> 15:22 28:11 30:18 101:2 <b>school</b> 11:1 18:7,8 20:1 70:8 71:3 89:10,12 <b>scope</b> 75:9 <b>scribble</b> 46:9 <b>seal</b> 106:10 <b>search</b> 18:22 <b>seated</b> 5:5 <b>second</b> 45:11 46:22,24 47:15 48:12 49:18 64:10 75:11 <b>section</b> 9:7 76:17 77:12,13,16,17 99:8 <b>sections</b> 76:22 <b>see</b> 19:3 24:24 35:21 36:6,24 38:20 42:5 47:18,20,23,24 48:8 49:14 53:21,22 54:2 55:22 56:14,18 58:6,10 65:17 65:22,24 74:16 76:16,17 77:15 77:18 78:17,22 82:4 88:13,20 89:24 90:2,24 91:1,9 102:13 105:7 <b>seeing</b> 44:14 80:15 <b>seek</b> 98:11 <b>seeks</b> 99:19 100:25</p>	<p><b>seen</b> 35:11 51:20 57:8 58:23 62:16 74:2,5 <b>seizure</b> 18:22 <b>send</b> 53:7,9 54:5 56:3 <b>senior</b> 14:10,20 16:22 19:17,25 20:6 22:5 47:4,9 47:22 48:4,13 48:17 73:22 <b>seniors</b> 38:22 <b>sense</b> 74:22 75:16 <b>sensitive</b> 75:8 <b>sent</b> 24:12 41:2,4 50:14 56:6,15 <b>sentence</b> 78:6 79:10 102:7 <b>series</b> 91:21 <b>serves</b> 45:12 <b>session</b> 35:9 44:12 45:23 <b>set</b> 13:24 69:14 87:16 90:11 <b>seven</b> 75:11 <b>seventeen-year-...</b> 82:24 85:11 93:15 95:3 102:25 <b>seventh</b> 75:12 <b>sex</b> 70:5 78:14 96:5 104:15,23 105:1 <b>sexual</b> 6:16 78:10 78:13,18,23 79:1,1,2,7,14 80:2,17,20,24 81:14,25 82:5 86:11 102:10,24 103:2 <b>sheet</b> 3:6 37:13,16 37:24 38:1,5,7,8 38:15,20 39:3 39:17 42:15 43:2 44:9,11,15</p>	<p>44:20,21 45:5 46:3 74:3 <b>short</b> 6:7,10,15 51:19 <b>shot</b> 83:16 85:3 <b>show</b> 51:25 <b>shown</b> 66:8 <b>sick</b> 14:13 <b>side</b> 15:11 <b>sign-in</b> 3:6 37:13 37:16,24,25 38:4,7,8,15 39:3 39:17 42:15 43:2 44:9,11,19 45:5 74:3,3 <b>signature</b> 46:11 <b>signatures</b> 43:4 45:10,11 <b>Similarly</b> 6:21 <b>simply</b> 55:2 <b>Simpson</b> 2:14 22:25 23:1,22 28:23 31:17 34:10 35:6 39:10,25 43:6 43:19 44:12 45:7 49:5 52:22 58:21 59:6 60:6 63:4,15 65:23 72:21,23 <b>sir</b> 4:10 16:2 18:2 18:10 <b>sit</b> 87:18 88:1 <b>sitting</b> 14:16 16:23 <b>situation</b> 23:9 24:19 25:23,24 30:25 33:5,19 33:25 <b>six</b> 14:5,6,18,23 16:11 19:22 20:6 37:20 47:3 48:14 75:10 76:15 77:12 <b>sixteen-year-old</b></p>
--	--	--	---	--

<p>97:24  <b>Slater</b> 17:21 18:3  <b>Slatton</b> 48:7  <b>slide</b> 39:18 40:12  51:21,25 65:11  65:18,23 66:7  67:1  <b>slides</b> 50:16  <b>slight</b> 70:21  <b>Smith</b> 48:12  <b>SOCE</b> 6:15  <b>sole</b> 100:2  <b>SOLI</b> 1:10  <b>solicited</b> 12:9  <b>somebody</b> 15:19  24:12 33:7  38:24 56:3  67:20 70:8  <b>someone's</b> 82:5  <b>sorry</b> 96:14 99:4  101:17 103:9  <b>sort</b> 16:23  <b>South</b> 15:12,16  <b>speak</b> 5:6 37:15  <b>speaking</b> 17:1  <b>special</b> 26:10,12  93:21 94:5  <b>specific</b> 39:13  40:4 55:13 82:7  <b>specifically</b> 75:14  104:4  <b>speculate</b> 39:23  61:7  <b>speculation</b> 61:2  86:16 101:24  <b>spell</b> 37:18  <b>spending</b> 96:8  <b>spent</b> 7:3  <b>spot</b> 47:6  <b>staff</b> 59:20  <b>stage</b> 99:16,18  <b>stands</b> 6:16,21  <b>start</b> 4:24 26:4  36:17 56:5  <b>started</b> 9:22</p>	<p><b>starting</b> 10:25  <b>starts</b> 23:18 75:10  <b>state</b> 4:2,5,18 61:8  106:3,20 107:2  107:5  <b>stated</b> 35:16  64:16  <b>statement</b> 43:22  74:23  <b>States</b> 1:1 75:12  <b>stay</b> 98:14  <b>stenographically</b>  107:8  <b>steps</b> 23:13  <b>stop</b> 103:4 104:24  <b>strategy</b> 32:4  <b>street</b> 1:23 4:3  32:23  <b>streets</b> 9:8,11,17  <b>string</b> 54:13  <b>structure</b> 13:25  18:24  <b>struggling</b> 70:3  98:12  <b>stuff</b> 24:15 42:7  <b>subject</b> 6:13  18:17  <b>subparagraph</b>  76:19  <b>subtitle</b> 49:20  <b>sufficient</b> 10:9  <b>Suite</b> 1:24 4:3  <b>supervise</b> 14:8  <b>supervision</b> 17:4  <b>supervisor</b> 14:11  14:13 17:14  19:25 30:24  34:7 37:15 47:6  47:14,17,21  48:7,10,11  <b>supervisors</b> 14:5  14:6,9,18 19:22  20:6 22:5 37:12  37:20 38:21  47:4 48:15,20</p>	<p>73:22  <b>supervisory</b> 17:13  <b>support</b> 99:10,12  <b>supporting</b> 96:4  <b>suppose</b> 89:1  92:11  <b>sure</b> 4:25 6:2 17:8  17:10,12 28:6  29:25 31:21  39:22 42:9 52:4  64:17 70:16,18  78:22 98:1  103:9,9  <b>Susan</b> 37:17 41:3  48:11 50:14  <b>sway</b> 98:19  <b>switch</b> 15:20  <b>sworn</b> 4:13 106:8  <b>system</b> 26:9 93:20</p> <hr/> <p style="text-align: center;"><b>T</b></p> <hr/> <p><b>T</b> 107:1,1  <b>take</b> 4:23 14:12  18:15,16 22:11  23:14 31:1,1,8  32:24 42:17  44:8 46:2 53:14  54:8,19 75:4,6  75:24 76:1,7  77:11,21,24  79:7,10 105:6  <b>taken</b> 1:20 4:1  6:24 25:22  27:13,21 33:15  45:5 88:15  <b>takes</b> 8:12  <b>talk</b> 42:19 64:10  86:2 88:11 89:1  89:25 95:2  <b>talked</b> 19:19 65:3  88:23 92:6,9  <b>talking</b> 6:8,11  16:8 21:3 22:24  34:1 36:14  37:21 43:21</p>	<p>56:9 76:9 77:16  90:7 92:13  93:15 100:13  <b>talks</b> 99:8  <b>tall</b> 19:1 23:17  33:6,8  <b>tallness</b> 69:17  <b>Tampa</b> 1:2,11,14  1:15,24 2:8,9,11  2:12 3:11 4:4  6:8,12 7:4 8:4  8:17 10:18,20  10:22 15:12,15  15:16 18:6  19:25 20:9,12  21:4 46:4,20  47:1 68:17  73:14 77:15  85:21 95:10  98:11 103:1  <b>Tampa's</b> 67:17  76:8  <b>tangible</b> 69:17  <b>tax</b> 8:10,14,16,16  9:1 17:14  <b>team</b> 14:6 15:9,19  17:2  <b>teams</b> 14:12,23  16:12,23,24  <b>Telephone</b> 2:3,9  2:13  <b>tell</b> 10:24 13:4,12  13:18,23 47:3,6  48:20 53:22  54:18 59:18  60:3 63:6,7 65:5  76:7 84:11  87:11,19,25  90:18 93:5  <b>tells</b> 104:4,22  <b>ten</b> 14:8,23 57:14  91:22 95:6  <b>ten-year-old</b> 95:4  <b>tendencies</b> 96:22  <b>term</b> 10:11 79:11</p>	<p>79:21  <b>terminology</b>  25:12  <b>terms</b> 13:24 66:17  78:19,24 79:6  80:1,23 102:24  <b>test</b> 36:23  <b>testified</b> 40:16  45:6,18 49:3  57:15 66:5  101:2  <b>testifies</b> 4:14  <b>testify</b> 4:13 36:11  <b>testifying</b> 30:9  44:10  <b>testimony</b> 5:11  43:12 100:12  107:10  <b>Thank</b> 42:14  105:11,12  <b>theirs</b> 71:5  <b>therapist</b> 95:9  96:3,20,23  98:10,10,14  103:2  <b>therapy</b> 3:8 6:12  12:3 20:14 22:8  27:19 30:18  49:13,20,23,24  52:21 58:4,7,8  58:16 59:16  60:22 63:17  64:2 66:13 67:4  67:15 68:6  69:25,25 71:21  71:24,25 72:2,2  73:9 74:4 76:8  77:14,20 78:7,8  81:12 83:9 84:5  84:14 85:23  88:24 93:14  95:19 97:5 99:8  99:9 100:3  102:3,8,8  104:14 105:2</p>
--	--	--	--	---

<p><b>thing</b> 7:13 11:6 18:22 24:21 25:7 29:12 31:2 33:22 36:14 56:25 59:18 64:13 69:12 91:12 94:15 <b>things</b> 5:14 9:6,9 18:25 19:2 23:18 24:9 25:2 25:3 26:18 31:12 36:13 68:20 69:17,21 70:22 75:14 90:23 98:11 <b>think</b> 5:25 8:23 12:24 21:10 22:14 29:6 30:23 31:5 33:6 33:14 35:14 37:14 38:12 39:12 41:5 45:18 50:14 52:9 54:19 57:15 58:21 60:21 68:9,9,10 69:3,4,14 71:12 72:21 74:9,13 75:3,15,25 80:4 80:18 81:17 82:17 84:8 87:3 88:11 99:1,12 99:13 105:5 <b>thinking</b> 36:17 98:25 <b>thinks</b> 75:21 <b>thirty</b> 7:3 10:23 <b>thirty-five</b> 46:19 <b>thirty-six</b> 45:13 46:6 <b>thought</b> 55:15,17 57:15 <b>thoughts</b> 12:9 98:6 <b>three</b> 14:9,20</p>	<p>16:22 19:17 20:5 47:4 48:17 48:17 50:1,4,6,9 50:16 57:12,16 74:21 <b>three-minute</b> 75:6 <b>Thursday</b> 55:15 55:19,22,24 62:17 <b>ticket</b> 26:1,2,3,4,6 27:11,13,21 28:10 29:23 30:13 31:22 32:8 93:8,11,17 94:1,8,12,25 <b>ticketed</b> 93:13 <b>tickets</b> 26:11,21 94:2 <b>time</b> 1:25 5:6 6:1 6:3 13:11 22:15 22:16 33:2,18 44:3,14 52:15 59:22 60:9,10 60:16 75:4 82:25 85:14 91:19 96:8 97:25 <b>timeframe</b> 43:21 <b>times</b> 7:2 74:21 <b>title</b> 17:24 23:2 49:13,19,22 58:3 <b>today</b> 5:4 6:1,6,15 15:19 35:24 36:11,19 41:13 57:9 75:19 76:9 87:18 88:1 105:11 <b>today's</b> 7:9,23 <b>told</b> 12:21 13:2 38:6,9 39:7 44:20,21 54:1 66:18,19 86:21 88:15 100:16 <b>tomorrow</b> 15:20</p>	<p>23:23 39:25 <b>tomorrow's</b> 42:12 <b>top</b> 14:16 16:24 46:24 47:8 49:13 56:8 58:4 58:7 69:9 <b>topic</b> 51:22 <b>toys</b> 96:17 <b>traditionally</b> 96:25 <b>trained</b> 22:19 69:16,21,24 70:2 <b>training</b> 11:17 19:10 20:10,13 20:16,23 21:3 21:17,23 22:2,6 22:10 23:5 34:10,16,18,19 34:23,25 36:15 38:13 44:12 45:7,25 52:21 53:21 60:7 64:14 65:25 66:8,17,23 72:14,16,19 73:2 87:16 101:13,22 <b>trainings</b> 21:14 <b>transcribe</b> 5:11 <b>transcribed</b> 5:4 35:1 <b>transcript</b> 107:9 <b>transcription</b> 35:8 107:9 <b>transition</b> 99:11 <b>trash</b> 69:18 <b>treatment</b> 78:9 80:16 81:13 102:9 <b>tried</b> 39:9 <b>troops</b> 22:20 <b>trucks</b> 96:7 <b>true</b> 107:9 <b>trusted</b> 68:16</p>	<p>81:20 <b>truth</b> 4:13 <b>try</b> 36:1 39:13 51:6 83:4 <b>trying</b> 30:23 32:2 36:13,23 41:24 58:19 74:18 84:9 97:5 102:23 <b>Tuesday</b> 42:25 <b>turn</b> 79:7 <b>Turning</b> 76:15 <b>twelve</b> 14:8,23 42:24 <b>twenty</b> 39:5 40:6 <b>twenty-eight</b> 45:10 <b>twenty-one</b> 25:21 <b>twist</b> 100:6 <b>two</b> 15:17 41:17 43:1,9 48:20 56:4 74:21 79:6 80:1,23 88:6 101:7 <b>type</b> 7:13 11:6 18:22 24:21 25:7 26:16 31:2 33:21 60:1 91:12 <b>typically</b> 24:1 96:9 <b>typing</b> 103:19</p> <hr/> <p style="text-align: center;"><b>U</b></p> <hr/> <p><b>uh-huh</b> 5:8,14 14:15 68:15 81:21 97:7 <b>Uhm</b> 16:13 <b>ultimate</b> 28:20 29:4 <b>ultimately</b> 27:23 27:24 <b>umbrella</b> 20:7 <b>uncertain</b> 97:25 <b>undergoing</b> 99:10</p>	<p><b>underneath</b> 13:13 <b>undersigned</b> 106:6 <b>understand</b> 5:17 5:21 6:7,11 30:3 54:23 62:12 64:4,22 75:2,3 78:19,24 79:6 82:14 92:16 102:16 <b>understanding</b> 75:18 77:3 81:7 <b>understood</b> 5:22 20:8 21:10 30:9 30:10 100:21 <b>United</b> 1:1 75:12 <b>unlawful</b> 77:13 <b>unnecessary</b> 42:4 74:15,19 <b>Update</b> 3:6 43:6 <b>use</b> 65:9 75:16,24 <b>usually</b> 25:15,17 56:3,7</p> <hr/> <p style="text-align: center;"><b>V</b></p> <hr/> <p><b>V</b> 2:10 <b>vacation</b> 14:13 38:24 <b>vague</b> 97:3 101:16 101:18 103:15 <b>various</b> 44:1 <b>VAZZO</b> 1:8 <b>verbalize</b> 5:12 <b>verbally</b> 96:4 <b>versa</b> 79:24 <b>versus</b> 15:10 <b>vice</b> 79:24 <b>victim</b> 82:15 90:1 92:9 <b>victim's</b> 82:19 <b>victimized</b> 82:20 <b>video</b> 35:1,8 <b>view</b> 44:1 73:7,14 73:16 <b>Villa</b> 47:24 48:1</p>
--	--	--	--	--

<p><b>violation</b> 8:13 25:9,10,13,14 26:16 27:2,13 27:21 28:10 29:22 31:23 32:7,9,20 33:8 33:15 49:14 50:1 58:10,18 61:20,23 64:3 65:7 67:16,24 68:5 69:1 81:23 82:12 86:10 87:12,19 88:2 88:15,19 92:11 92:18 93:6 94:7 95:20 96:9,22 97:11,20 98:15 99:13,15,17,20 100:15 101:3 104:12 <b>violations</b> 32:23 33:21 <b>violator</b> 91:14 <b>visible</b> 55:12 <b>voluntarily</b> 41:18 42:7 95:18 97:13 <b>voluntary</b> 100:25 <b>vs</b> 1:13</p> <hr/> <p style="text-align: center;"><b>W</b></p> <hr/> <p><b>W-e-n-r-i-c-k</b> 37:19 <b>waiver</b> 74:24 <b>waiving</b> 74:17 <b>walk</b> 86:2 103:5 <b>want</b> 33:19 39:17 42:7 43:16 51:13 63:8 66:24 67:6 74:12 76:10,11 79:17,18,24 81:4 85:24 90:24 98:13 <b>wanted</b> 23:6 36:6</p>	<p>36:24 38:2 53:22 54:2,7 86:24 98:18 <b>wants</b> 79:22 83:4 85:5,6,16 98:2 104:24 <b>warning</b> 94:17,18 <b>warrants</b> 67:18 <b>wasn't</b> 34:17 36:20,21 62:20 62:21,21 63:5 73:4 <b>way</b> 5:13 13:21 30:9 31:18,20 32:19 34:8 36:2 39:12 45:25 46:18 58:22 67:8 69:14,15 87:17 90:11 94:23 98:19 99:22 104:8 <b>ways</b> 56:4 96:24 <b>we'll</b> 5:25 6:2 7:5 17:15 41:19 47:7 52:14 74:16 75:3 83:22 89:24 105:7 <b>we're</b> 4:23,25 16:8 17:10 22:22 28:1 31:15,19 43:21 51:10,17 52:7 57:7 65:12 67:3 67:19 75:18 83:18 84:18 87:7,13,17 91:17 100:21 105:5 <b>we've</b> 24:7 31:9 34:5 39:8,9 74:2 75:22 76:9 88:1 92:12 93:15 95:3 100:13 <b>week</b> 15:20 35:14</p>	<p>35:23 36:5 40:17,25 49:4 52:1,20 57:8 58:13,24 <b>weekly</b> 59:20 <b>Wenrick</b> 37:17,23 38:13 41:3,6 44:11,20 48:11 50:14 52:19,25 54:12 55:8 <b>Wenrick's</b> 39:11 <b>went</b> 24:22 86:23 <b>weren't</b> 66:12 <b>whatnot</b> 96:7 <b>Williams</b> 2:10 7:18,18,25 8:20 16:16 21:2 23:21 29:15,17 29:24 34:1 39:2 39:4,20 40:3,8 40:12,15,18 41:9,21 42:13 42:15,19,24 47:12 51:12,17 52:12 54:19 55:1 59:14 61:1 61:6 62:3 63:24 64:4,12 65:8 70:11 71:7 74:12,22 75:7 75:19,20 78:2 79:9,13 82:7 83:12 84:6,24 86:13 87:5 88:3 88:17 91:16 92:15 95:6,12 95:22 96:13,15 97:1 98:16 99:3 99:5,21 101:16 101:18,23 103:7 103:9,14,18 104:8 105:13 <b>willing</b> 39:17 41:13 86:1 <b>witness</b> 4:1,15 5:2</p>	<p>16:17 27:3 29:16 30:4 34:4 54:21 55:2,6 59:17,22,25 60:3 61:8 62:6 64:6,8,13,16,18 64:21 68:3 70:13,17,19 71:12 78:4 79:14,16 83:15 83:18,22,25 84:8 85:5,9 86:17 87:6 88:18 91:25 92:2,16 93:24 95:23 96:1,14 96:16 97:4,8 98:18 99:4,7 100:4,9 101:17 101:25 104:2,7 104:11,14,17 105:12 106:10 107:10 <b>witnesses</b> 23:22 41:16 91:15 <b>word</b> 11:8,21 61:11,16,17 65:10,17 82:9 <b>words</b> 53:18 63:10,21 66:24 67:6 104:4 <b>work</b> 9:6 16:11,19 17:4,8 28:18 34:8 57:4 <b>worked</b> 90:21 <b>workers</b> 14:8 <b>working</b> 10:22 69:6 <b>workload</b> 15:15 <b>works</b> 14:2 <b>worry</b> 104:6 <b>worth</b> 75:24,25 <b>wouldn't</b> 15:22 21:6 91:1 <b>wrapping</b> 105:7</p>	<p><b>write</b> 31:22 59:2 63:6 <b>written</b> 34:22 94:14 <b>wrote</b> 59:5,6 62:21</p> <hr/> <p style="text-align: center;"><b>X</b></p> <hr/> <p style="text-align: center;"><b>Y</b></p> <hr/> <p><b>yeah</b> 6:20 8:5,24 11:2,9 14:1,3 15:14 16:17 17:2 18:13,19 19:6 20:22 21:11 25:11,17 27:1,15 28:13 29:10 30:20 32:20 35:4,20 36:3 37:19 38:8 40:8,24 47:8 50:11 52:23 54:25 55:17 62:25 64:6 66:4 66:14 67:2 70:11,13,21 73:11 75:7 77:18 79:13 80:14 84:8 85:9 89:9,12 92:1 94:18 96:18 97:22 98:22 100:17,20 104:16 <b>year</b> 58:20 <b>years</b> 7:3 9:21 10:23 90:21 <b>Yep</b> 25:19 34:3 47:25 83:3 <b>yesterday</b> 39:7 86:20</p> <hr/> <p style="text-align: center;"><b>Z</b></p> <hr/> <p><b>zoning</b> 26:19 68:20</p>
---	---	--	--	--

Vazzo v. City of Tampa  
 Sal Ruggiero

10/30/2018

Page 123

<b>0</b>	<b>32854-0774</b> 2:3		
	<b>33601-0380</b> 2:8		
<b>1</b>	<b>33602-5211</b> 2:12		
<b>1</b> 3:6 43:3,21 44:7	<b>33603</b> 1:24		
44:8 45:2,12	<b>380</b> 2:8		
72:14	<b>4</b>		
<b>1&amp;2</b> 3:5 44:4	<b>4</b> 3:2,3,10 76:3,6		
<b>12:59</b> 1:25 105:14	<b>407-875-0770</b> 2:4		
<b>14</b> 106:21	<b>44</b> 3:5		
<b>14-312</b> 77:16	<b>5</b>		
<b>15</b> 40:19 43:22	<b>5</b> 77:12,17		
<b>16</b> 43:21	<b>51</b> 3:7		
<b>17</b> 43:3,22 44:17	<b>540774</b> 2:2		
<b>1st</b> 37:14 38:12	<b>6</b>		
44:23 59:9,13	<b>7</b>		
60:1	<b>7</b> 76:17		
<b>2</b>	<b>76</b> 3:10		
<b>2</b> 3:6 44:8 49:2,12	<b>8</b>		
51:9,21 57:8	<b>8/1</b> 44:17		
<b>201</b> 1:23 4:3	<b>8:17-cv-02896-...</b>		
<b>2011</b> 10:21	1:2		
<b>2013</b> 9:22	<b>800-671-1776</b> 2:3		
<b>2017</b> 22:15,19	<b>813-221-2626</b> 2:9		
34:11 37:10	<b>813-274-7599</b>		
38:12 44:24	2:13		
45:6 52:22 59:8	<b>9</b>		
59:13 72:14	<b>9:56</b> 1:25		
<b>2017-47</b> 3:11	<b>936928</b> 106:20		
<b>2018</b> 1:23 56:1			
106:11 107:14			
<b>2019</b> 106:21			
<b>25th</b> 55:25 56:1			
<b>2nd</b> 106:10			
107:14			
<b>3</b>			
<b>3</b> 3:7 51:16 52:18			
57:4,7,12			
<b>30</b> 1:23			
<b>30(b)(6)</b> 23:22			
75:10,19			
<b>30th</b> 42:25			
<b>315</b> 2:12			
<b>3200</b> 1:24 4:4			

Vazzo v. City of Tampa  
Guido Maniscalco

10/31/2018

Page 1

IN THE UNITED STATES DISTRICT COURT FOR  
THE MIDDLE DISTRICT OF FLORIDA  
Tampa Division  
Civil Action No. 8:17-cv-02896-CEH-AAS

ROBERT L. VAZZO, LMFT, individually  
and on behalf of his patients,  
DAVID H. PICKUP, LMFT, individually  
and on behalf of his patients, and  
SOLI DEO GLORIA INTERNATIONAL,  
INC., d/b/a NEW HEARTS OUTREACH  
TAMPA BAY, individually and on behalf  
of its members, constituents and clients,

Plaintiffs,

vs.

CITY OF TAMPA, FLORIDA, and  
SAL RUGGIERO, in his official capacity as  
Manager of the City of Tampa  
Neighborhood Enhancement Division,

Defendants.

\_\_\_\_\_ /

\* \* \* \* \*

DEPOSITION OF COUNCILMAN GUIDO MANISCALCO  
TAKEN AT THE INSTANCE OF THE PLAINTIFFS

\* \* \* \* \*

DATE: October 31, 2018  
PLACE: 201 North Franklin Street  
Suite 3200  
Tampa, Florida 33603  
TIME: 9:02 - 1:46 o'clock p.m.

Florida Court Reporting  
561-689-0999

Vazzo v. City of Tampa  
Guido Maniscalco

10/31/2018

Page 2

1 APPEARANCES:

2 LIBERTY COUNSEL

PO Box 540774

3 Orlando, Florida 32854-0774

Telephone: 800-671-1776

4 Fax: 407-875-0770

Attorneys for the Plaintiffs

5 BY: HORATIO G. MIHET, ESQUIRE

Email: Hmihet@lc.org

6 BY: ROGER GANNAM, ESQUIRE

Email: Rgannam@lc.org

7

BURR & FORMAN, LLP

8 PO Box 380

Tampa, Florida 33601-0380

9 Telephone: 813-221-2626

Attorneys for the City of Tampa

10 BY: ROBERT V. WILLIAMS, ESQUIRE

Email: Rwilliams@burr.com

11

CITY OF TAMPA

12 315 East Kennedy Boulevard

Tampa, Florida 33602-5211

13 Telephone: 813-274-7599

BY: DAVID HARVEY, ESQUIRE

14 Email: David.harvey@tampagov.net

BY: JERROD D. SIMPSON, ESQUIRE

15 Email: Jerrod.simpson@tampagov.net

16

17

18

19

20

21

22

23

24

25

Vazzo v. City of Tampa  
Guido Maniscalco

10/31/2018

Page 3

1	INDEX	
		PAGE
2	COUNCILMAN GUIDO MANISCALCO	5
	DIRECT EXAMINATION BY MR. GANNAM	5
3		
	EXHIBITS	
4		PAGE
5	Plaintiffs' Exhibit No. 5 marked for identification	10
6	(Plaintiffs' Notice of Taking Depositions of Defendants)	
7	Plaintiffs' Exhibit No. 6 marked for identification	26
8	(Tampa Bay Times Article)	
9	Plaintiffs' Exhibit No. 7 marked for identification	50
10	(E-mail from Erica Dotson to Tampa City Council dated 2/20/2017)	
11		
12	Plaintiffs' Exhibit No. 8 marked for identification	52
13	(E-mail from Leslie Reed to Tampa City County dated 3/2/2017)	
14	Plaintiffs' Exhibit No. 9 marked for identification	53
15	(E-mail from Tea Sefer to Tampa City Council dated 3/2/2017)	
16		
17	Plaintiffs' Exhibit No. 10 marked for identification	56
18	(E-mail from Carrie Henriquez to Nadine@eqfl.org dated 2/16/2017)	
19	Plaintiffs' Exhibit No. 11 marked for identification	62
20	(E-mail from Annie Greenspan to Carrie Henriquez dated 2/10/2017)	
21		
22	Plaintiffs' Exhibit No. 12 marked for identification	64
23	(E-mail string beginning from Carrie Henriquez to Nadine Smith and Dan Benoit dated 2/16/2017)	
24		
25		

1	EXHIBITS CONTINUED	
2	Plaintiffs' Exhibit No. 13 marked for identification	67
3	(E-mail string beginning from Carrie	
4	Henriquez to hannah@eqfl.org, Stratton	
5	Pollitzer and Nadine Smith dated	
6	2/16/2017)	
7	Plaintiffs' Exhibit No. 14 marked for identification	69
8	(E-mail string beginning from Carrie	
9	Henriquez to Hannah Willard and Kaitlin	
10	Connolly dated 3/2/2017)	
11	Plaintiffs' Exhibit No. 15 marked for identification	75
12	(E-mail string beginning from Hannah	
13	Willard to Carrie Henriquez dated	
14	4/7/2017)	
15	Plaintiffs' Exhibit No. 16 marked for identification	77
16	(E-mail string beginning from Carrie	
17	Henriquez to Mark Puskarich dated	
18	12/11/2017)	
19	Plaintiffs' Exhibit No. 17 marked for identification	95
20	(Report of the American Psychological	
21	Association Task Force on Appropriate	
22	Therapeutic Responses to Sexual	
23	Orientation)	
24		
25		

Vazzo v. City of Tampa  
Guido Maniscalco

10/31/2018

Page 5

1 The deposition of COUNCILMAN GUIDO MANISCALCO,  
2 witness, was taken before me, Rachele Cibula, Notary  
3 Public, State of Florida at large, at 201 North Franklin  
4 Street, Suite 3200, in the City of Tampa, County of  
5 Hillsborough, State of Florida, pursuant to notice in  
6 said cause for the purpose of taking said deposition at  
7 the instance of the Plaintiffs in the above-styled  
8 action pending in the above-styled court.

9 THE COURT REPORTER: Raise your right hand,  
10 Please, sir.

11 THEREUPON,

12 COUNCILMAN GUIDO MANISCALCO,  
13 being by me first duly sworn to testify the whole truth  
14 as is hereinafter certified, testifies as follows:

15 THE WITNESS: I do.

16 DIRECT EXAMINATION

17 BY MR. GANNAM:

18 Q. Good morning. I'm Roger Gannam, and we just met  
19 a moment ago. I'm a Plaintiffs' attorney in this  
20 lawsuit against the City of Tampa and Sal Ruggiero  
21 regarding Tampa's conversion therapy ban.

22 I want to go over a few ground rules with you  
23 before we get started. And let me ask you, first, have  
24 you ever given a deposition before?

25 A. No.

Florida Court Reporting  
561-689-0999

1 Q. Okay. As you know, we're making a written  
2 transcript of today's proceedings. So it's very  
3 important that, when we speak to each other, that we  
4 each give the other a chance to finish before starting  
5 with an answer or a question. Is that okay with you?

6 A. Yes.

7 Q. It's also important that all of your answers be  
8 out loud. You've already demonstrated you know how to  
9 do that. But, in normal conversation, we might tend to  
10 nod our head or give nonverbal responses. It's very  
11 important that everything be out loud today. Are you  
12 okay with that?

13 A. I understand.

14 Q. And, throughout the deposition, if I remind you  
15 of that, it's just for the purposes of the record. We  
16 all tend to not, you know, want to speak to each other  
17 in a way that's conducive to a written record. But I  
18 may remind you, and your attorney may remind you at some  
19 point today. Are you okay with that?

20 A. Yes.

21 Q. If I ask you a question that you don't  
22 understand, please let me know; and I will address  
23 whatever the problem might be.

24 A. I will.

25 Q. Okay?

Vazzo v. City of Tampa  
Guido Maniscalco

10/31/2018

Page 7

1 A. I will.

2 Q. If I ask you a question and you answer it, I will  
3 assume that you understood me. Is that okay with you?

4 A. Yes.

5 Q. If your lawyer makes an objection, which he  
6 probably will at some point to one or more of my  
7 questions, the procedure is for him to make his  
8 objection for the record; and then you go ahead and  
9 answer the question --

10 A. Okay.

11 Q. -- unless he tells you specifically not to  
12 answer. Are you okay with that?

13 A. I understand.

14 Q. We are going to be here for most of the day  
15 between the two witnesses. But this is not a marathon.  
16 If you need to take a break, just let me know. And all  
17 I would ask is, if I have asked a question, that you  
18 answer it before we take any breaks.

19 A. I will.

20 Q. Okay. Do you have any questions for me before we  
21 go further?

22 A. No.

23 Q. All right. I'm going to go over a few terms that  
24 will come up today throughout this deposition just to  
25 make sure we both understand what I'm talking about.

Vazzo v. City of Tampa  
Guido Maniscalco

10/31/2018

Page 8

1 When I say the City, I mean the City of Tampa. Are you  
2 okay with that?

3 A. Yes.

4 Q. And, when I say the ordinance, I'll be speaking  
5 of the Tampa conversion therapy ordinance, also known as  
6 2017-47, which is the subject of this lawsuit. Do you  
7 understand that?

8 A. Yes.

9 Q. The initials or abbreviation LGBT, do you  
10 understand what that means?

11 A. Yes.

12 Q. The initials or acronym SOCE, S-O-C-E, do you  
13 understand what that means?

14 A. Yes.

15 Q. Okay. And, just for the record, I'm talking  
16 about sexual orientation change efforts.

17 I may also refer to gender identity change  
18 efforts as being something different or separate from  
19 sexual orientation change efforts. Does that make  
20 sense?

21 A. Yes.

22 Q. And, when I refer to conversion therapy, that  
23 will refer to generally what is identified in the  
24 ordinance as conversion therapy. But that may include  
25 sexual orientation change efforts or gender identity

1 change efforts or both. Is that okay?

2 A. Yes.

3 Q. And, if I use one of those terms and, in the  
4 context of my question, it doesn't make sense or you  
5 don't understand what I mean, please just say so; and  
6 we'll work on that.

7 A. I will.

8 Q. All right. Let's start with your name for the  
9 record, please.

10 A. Guido Maniscalco.

11 Q. And, Mr. Maniscalco, in what capacity are you  
12 appearing here today? I mean, what is your position  
13 with the City of Tampa?

14 A. City Council Member representing District 6.

15 Q. And are you currently taking any medication that  
16 could affect your ability to recall facts or testify  
17 truthfully today?

18 A. No.

19 Q. All right. Are you -- do you have any injury or  
20 condition that would prevent you from being able to  
21 recall facts or testify truthfully today?

22 A. No.

23 Q. And you are appearing today pursuant to a Notice  
24 of Deposition. I'm handing you a copy. I've marked it  
25 as Exhibit 5.

1 (Plaintiffs' Exhibit No. 5 marked for identification)

2 BY MR. GANNAM:

3 Q. This is Plaintiffs' Exhibit 5. It is Plaintiffs'  
4 Notice of Taking Depositions of Defendants. It includes  
5 the topics for the deposition of the City of Tampa for  
6 which you are appearing today. It is my understanding  
7 from conversation with your attorney that, starting on  
8 page three where the topics are numbered, you are  
9 appearing to testify regarding topics 1 through 5, 7 and  
10 8; and that's it. Is that also your understanding?

11 A. Yes.

12 MR. WILLIAMS: It could flow into 9 because  
13 it has the word enactment.

14 MR. GANNAM: Okay. Understood. There may  
15 be some overlap between --

16 MR. WILLIAMS: That's what I --

17 MR. GANNAM: -- Mr. Maniscalco and  
18 Mr. Simpson. Okay.

19 MR. WILLIAMS: That's what I was alluding  
20 to.

21 MR. GANNAM: Were there any other comments  
22 you wanted to make regarding that, Rob?

23 MR. WILLIAMS: No.

24 MR. GANNAM: Okay.

25 MR. WILLIAMS: Just trying to help out.

1 BY MR. GANNAM:

2 Q. Do you understand, Mr. Maniscalco, that, as the  
3 City's representative at this deposition, you're  
4 testifying, not only as to what you know, but what the  
5 City knows on any particular subject? Is that your  
6 understanding?

7 A. Yes.

8 Q. And, when I say, "you," or ask the question do  
9 you know, do you understand that I'm referring to what  
10 the City knows and not necessarily just you  
11 individually?

12 A. I do.

13 Q. Okay. Did you review any documents to prepare  
14 for your testimony today?

15 A. Just what I have in front of me, the questions.

16 Q. The deposition notice?

17 A. Yes, this is it.

18 Q. You didn't look at any other documents to  
19 prepare?

20 A. No, just the questions.

21 Q. Did you speak to anyone to prepare for your  
22 testimony today?

23 A. Just the attorney.

24 Q. You mean, Mr. Williams?

25 A. Yes.

1 Q. Anyone on the City Attorney's staff?

2 A. No.

3 Q. And how many times did you meet with Mr. Williams  
4 to prepare for today?

5 A. One time.

6 Q. When was that?

7 A. Two days ago.

8 Q. And about how long did you meet for?

9 A. About two hours.

10 Q. All right. So, apart from Mr. Williams, did you  
11 meet with anyone else to prepare for your testimony  
12 today?

13 A. No, just him.

14 Q. I want to talk about your background. Can you  
15 give me just a summary of your education following high  
16 school.

17 A. A bachelor's degree from the University of South  
18 Florida.

19 Q. What year did you receive that degree?

20 A. 2007.

21 Q. What was the degree in?

22 A. English.

23 Q. Any other college degrees?

24 A. No, that's it.

25 Q. Any professional certifications or licensures or

1 anything like that?

2 A. No.

3 Q. Can you kind of now just give me a summary of  
4 your professional career following college.

5 A. I always worked in retail, retail sales.

6 Q. What -- what companies have you worked for?

7 A. Dillard's, Montblanc and just for myself in the  
8 watch industry, vintage watches.

9 Q. Is your position as a City Council member a  
10 full-time job?

11 A. Yes, it is. This is what I do for a living.

12 Q. So do you maintain any other employment or  
13 business interests outside of your City Council  
14 membership?

15 A. No, just this.

16 Q. What did you do immediately before joining the  
17 City Council?

18 A. Vintage watches, what I stated before, retail  
19 sales just for myself.

20 Q. Was that your own business?

21 A. Yeah. It was just a website.

22 Q. Does that website still exist?

23 A. No. After I got elected, I just did this  
24 full-time.

25 Q. How long were you in that vintage watch venture?

1 A. I would say about three years, three and a half  
2 years.

3 Q. And when did you -- when were you elected to the  
4 City Council?

5 A. 2015.

6 Q. Okay. Were you -- prior to the passage of the  
7 ordinance at issue, were you involved in any advocacy  
8 for LGBT organizations or causes?

9 A. No.

10 Q. What about, since the ordinance was passed, have  
11 you been involved in advocacy for any LGBT organizations  
12 or causes?

13 A. No.

14 Q. And I take it then, since you weren't involved in  
15 any LGBT-related organizations or causes, you also have  
16 not been involved in any advocacy specifically relating  
17 to conversion therapy before or after the ordinance?

18 A. No.

19 MR. WILLIAMS: His statement is correct what  
20 you --

21 THE WITNESS: Oh, yeah. You're right, yeah.

22 MR. GANNAM: Yeah. Thanks for the  
23 clarification.

24 THE WITNESS: Right. Right.

25 BY MR. GANNAM:

1 Q. Do you have any training or experience in  
2 counseling or any other mental health related field?

3 A. No.

4 Q. When does your current term of office end?

5 A. I believe it's May 1st or April 30th. The new  
6 people get sworn in May 1st of this coming year, 2019.

7 Q. 2019?

8 A. Uh-huh.

9 Q. When will that election occur?

10 A. The election is March 5th.

11 Q. Of 2019?

12 A. Of 2019.

13 Q. And are you eligible for re-election?

14 A. Yes, I am.

15 Q. And are you running for re-election?

16 A. Yes, one more term.

17 Q. And then are you term limited after two?

18 A. Yes.

19 Q. All right. On the City Council, do you hold any  
20 positions on -- on committees or task forces or anything  
21 within your council responsibilities?

22 A. Yes. There's several Boards that I serve on.

23 Q. Okay. What are those?

24 A. The Hillsborough River Board; the Tampa Theater  
25 Board; the MPO, which is Metropolitan Planning

1 Organization.

2 Q. Okay.

3 A. And MM -- no, that's it. That's it.

4 Q. What is your position on the Hillsborough River  
5 Board?

6 A. Chairman.

7 Q. What about the Tampa Theatre Board?

8 A. Just a Board member.

9 And I also forgot to mention I'm on the Tampa Bay  
10 Estuary Policy Board. That's the other one. And that's  
11 just a Board member.

12 Q. And what is your position on the MPO?

13 A. Just a Board member.

14 And also, just not to leave it out, City Council  
15 is also the CRA Board. It's the same members. It's the  
16 Community Redevelopment Agency. And I'm current  
17 chairman of that. But it's -- we just, you know, close  
18 one set of books and open another. And those are all  
19 the Boards.

20 Q. Do you hold any officer positions or titles on  
21 the council at large?

22 A. No. I'm just a regular Board member.

23 Q. Okay. And all these -- the Hillsborough River  
24 Board, Tampa Theatre Board, MPO, Tampa Estuary Planning  
25 Board and the Community Redevelopment Agency, are those

1 all appointed positions?

2 A. Yes, they are.

3 Q. And who appoints those?

4 A. The Chairman of the City Council can appoint some  
5 Board positions. I am the mayor's appointee to the  
6 Tampa Bay Estuary Policy Board.

7 Q. Do you have any other -- do you hold any other  
8 mayoral appointments?

9 A. No. That's the only one.

10 Q. And the mayor is Mr. Buckhorn?

11 A. Yes, sir.

12 Q. Okay. It's my understanding that you were the  
13 originator or sponsor of the ordinance at issue in this  
14 lawsuit; is that correct?

15 A. Yes.

16 Q. Tell me, when did -- or can you just kind of tell  
17 me how that came about. Where did it start?

18 A. A friend of mine brought the idea up to me and  
19 said why not -- why doesn't -- why don't you look into  
20 this, you know, from a City Council perspective. And,  
21 soon after, I think within a few weeks, I made a -- made  
22 the motion to get that rolling.

23 Q. Who was that friend?

24 A. His name is Bryan, B-r-y-a-n. Last name is  
25 Farris, F-a-r-r-i-s.

1 Q. And how do you know Mr. Farris?

2 A. Through political circles.

3 Q. And does he have -- does he hold a political  
4 position?

5 A. No. No, he's just a private citizen.

6 Q. How long have you known him?

7 A. I've known him since 2012.

8 Q. Is Mr. Farris a Tampa resident?

9 A. Yes.

10 Q. And did he tell you what his interest was in the  
11 subject of conversion therapy?

12 A. No, he did not.

13 Q. In other words, did he tell you why he thought it  
14 was a good idea?

15 A. He's a -- he's a gay man --

16 Q. Right.

17 A. -- and he just said, why don't you look into  
18 this; and that was it. Pretty basic.

19 Q. Do you know whether Mr. Farris is involved in  
20 LGBT advocacy organizations?

21 A. No.

22 Q. You don't know or he's not?

23 A. Not that I know of, no.

24 Q. Okay. Did Mr. Farris tell you that he personally  
25 had experienced anything that would fit the definition

1 of conversion therapy under the ordinance?

2 A. No, he did not.

3 Q. So do you know whether he had experienced  
4 anything like that?

5 A. No, I do not.

6 Q. All right. When did he bring this idea to you;  
7 do you recall?

8 A. From when I made the motion, a few weeks prior, I  
9 would think. You know, within thirty days prior.

10 Q. So we're thinking sometime around January 2017,  
11 December 2016, in that timeframe?

12 A. Whenever I made the motion, you know, let's say  
13 within thirty days before that.

14 Q. Okay. And that first motion was the motion to  
15 have the -- the City of Tampa legal department draft an  
16 ordinance?

17 A. It was to bring back a staff report just to get  
18 information, you know, how other places that have  
19 proposed this ban. You know, just for them to have a  
20 template and then just bring back a general staff report  
21 of -- before council.

22 Q. That staff report would have been prepared by the  
23 legal department?

24 A. Yes.

25 Q. Is that, in fact, what they did?

1 A. Yes.

2 Q. Did Mr. Farris tell you that he knew others who  
3 had experienced what is defined as conversion therapy in  
4 the ordinance?

5 A. No.

6 Q. At the time he brought the idea to you, did you  
7 know what conversion therapy was?

8 A. Yes, I did.

9 Q. And did you know of people who had -- who had  
10 received or experienced conversion therapy?

11 A. Through -- through some of my mother's friends  
12 growing up. She had a lot of friends that were gay, and  
13 I knew several of them. They're all dead. And just  
14 growing up, you know, hearing stories from her or from  
15 them.

16 Q. So you heard stories directly from some of those  
17 people who had experienced it?

18 A. Yes, as teen-agers.

19 Q. And how old were you when you heard these  
20 stories?

21 A. I may have been thirteen, fourteen.

22 Q. Do you know, from those stories, whether any of  
23 those persons experienced whatever they experienced in  
24 Tampa?

25 A. They were all from Tampa. Yeah, they're all

1 local people.

2 Q. And do you recall specifically what -- what  
3 practices or -- or therapies these people received or  
4 experienced that they told you about?

5 A. They -- nothing specific other than they were  
6 sent to, you know, some kind of counselor. I had  
7 heard -- you know, this is going back, you know, forty,  
8 fifty years -- electroshock therapy, you know, basic  
9 one-on-one counseling but nothing -- nothing further  
10 than that.

11 Q. Did any of them indicate that they were sent  
12 against their will or were receiving this without their  
13 consent?

14 A. One ended up committing suicide as a teen-ager.  
15 The other one essentially drank himself to death, just  
16 like a downward alcoholic spiral.

17 Q. But did any of them tell you whether -- what they  
18 -- whatever therapy they received was done against their  
19 will?

20 A. No. The one that committed suicide I never met.  
21 I only heard stories.

22 Q. And the one who suffered from alcoholism, did  
23 that person tell you about whether -- was it a he or a  
24 she?

25 A. It was a man. And all he told me was, you know,

1 my father always said he would never have a gay son. He  
2 would not accept a gay son. And, you know, I never went  
3 into -- you know, as a young man, I never asked, well,  
4 so what did your father -- you know, where did they send  
5 you to? He always had a difficult relationship with  
6 him.

7 Q. Apart from -- from these things you heard from  
8 these men or from your mother about them when you were a  
9 teen-ager, had you had any other reason to think about  
10 or consider conversion therapy prior to Mr. Farris  
11 bringing the idea to you?

12 A. Other than what -- what --

13 Q. Sorry. You can go ahead.

14 A. Other than what I would, you know, read on the  
15 internet, you know, things that would come up. I mean,  
16 it's brought up. I know one candidate for governor  
17 earlier this year brought up -- Gwen Graham brought up a  
18 -- you know, to have a statewide ban in the State of  
19 Florida. Of course, she -- she lost in the primary.  
20 But, you know, it's an issue that I see. I follow the  
21 news, and it comes up.

22 Q. I just want to go back to the -- the man who you  
23 knew when you were younger who you told us about his  
24 alcoholism and his father's rejection.

25 A. Uh-huh.

1 Q. Did he indicate to you any specifics about what  
2 kind of conversion therapy or similar therapy he  
3 received?

4 A. No. Out of respect, I just never -- never went  
5 further in the questioning other than, you know, we --  
6 we love you for who you are; and that's it.

7 Q. Do you know whether he had, in fact, received any  
8 kind of therapy that would be considered conversion  
9 therapy?

10 A. I never asked him. I know he -- other than, you  
11 know, struggled with his relationship with -- and his  
12 father was very strict. But I never went into further  
13 detail with him.

14 Q. Had you proposed any kind of conversion therapy  
15 related legislation to the City Council before  
16 Mr. Farris brought the idea to you?

17 A. No. This is the only time.

18 Q. Has anyone else, to your knowledge --

19 A. No.

20 Q. -- any other council members?

21 A. No, none at all. I'm the first and only one.

22 Q. You said you generally had -- or I don't want to  
23 put words in your mouth. Correct me if I'm wrong. You  
24 had some general knowledge of conversion therapy issues  
25 from what you heard or read in the news; is that

1 correct?

2 A. Other than what I would hear from, you know,  
3 growing up. My mother had so many friends that were  
4 gay, you know, from high school on up. Yeah, just --  
5 you know, whatever comes up in the news. Like, I -- you  
6 know, I follow the news fairly closely. So...

7 Q. At the time Mr. Farris presented the idea to you,  
8 were you personally aware of any particular instances of  
9 conversion therapy happening in Tampa?

10 A. I was not.

11 Q. And were you aware at that time of any specific  
12 complaints about the effects of conversion therapy from  
13 anyone outside of Tampa?

14 A. I was not.

15 Q. What was your specific motion or charge to the  
16 legal department? Were there particular questions you  
17 wanted answered? What was your expectation from the  
18 staff report that they were preparing?

19 A. If I remember correctly, it was -- I made the  
20 motion for the legal department to come back with a  
21 staff report to see about proposing a conversion therapy  
22 ban in the City of Tampa and looking at other  
23 municipalities, you know, in order to use it as a  
24 template and get information.

25 Q. And is that, in fact, what they did?

1 A. Yes, sir.

2 Q. What was the next step in that process? After  
3 the staff report came back, what happens next in the  
4 enactment?

5 A. You make a motion to bring it back as a draft  
6 ordinance for a first reading. And that's where you  
7 have discussion and a possible vote to move forward. So  
8 the other Council members can -- will chime in. And  
9 they could chime in when the staff report comes back.  
10 But it's another opportunity to have that public forum.

11 Q. Just, generally speaking, if it comes back for a  
12 first reading --

13 A. Uh-huh.

14 Q. -- is there a vote taken at that time --

15 A. First --

16 Q. -- on the first reading?

17 A. You have to vote twice. So you vote to move  
18 forward at first reading, and then you vote a second  
19 time at second reading to certify it and then send it to  
20 the mayor.

21 Q. And so I just want to make sure I understand the  
22 process. In this case, your first motion was to --

23 A. Get information.

24 Q. -- get information or a staff report, as you  
25 described it, right?

Vazzo v. City of Tampa  
Guido Maniscalco

10/31/2018

Page 26

1 A. Yes.

2 Q. The second step was a motion to actually prepare  
3 a draft ordinance?

4 A. Yeah, where we could vote on to move it  
5 forward --

6 Q. Okay.

7 A. -- for preliminary approval.

8 Q. And then the third step was what you call the  
9 first reading where I take it there is some debate and  
10 discussion about it and a vote at that time?

11 A. Yes.

12 Q. And then the final step would be the second  
13 reading where, again, you have discussion, debate and a  
14 vote?

15 A. And then you send it to the mayor.

16 Q. And then it gets sent to the mayor. Okay.

17 And that process that I just described with your  
18 help, is that generally how any ordinance gets passed in  
19 the law?

20 A. Yeah, that's of anything.

21 Q. Let me show you an exhibit I will mark as Exhibit  
22 6.

23 (Plaintiffs' Exhibit No. 6 marked for identification)

24 BY MR. GANNAM:

25 Q. This is a printout of an article from the Tampa

1 Bay Times produced in discovery with Bates number COT  
2 PRODUCTION 003826.

3 A. Uh-huh.

4 Q. Are you familiar with that article?

5 A. I am, yes.

6 Q. The headline reads, Tampa City Council discusses  
7 ban on conversion therapy for minors. It's dated  
8 January 26, 2017. The second paragraph reads, The City  
9 Council voted to schedule a February 16 discussion of  
10 the idea at the request of Council Member  
11 Guido Maniscalco.

12 A. Yes.

13 Q. Is that an accurate statement?

14 A. Yes. That would be that motion to bring it  
15 forward.

16 Q. Would that have been the motion to have the staff  
17 report prepared or the motion to go forward with the  
18 draft?

19 A. That is the -- the staff report, I believe.

20 Q. Okay. The next paragraph is a quote attributed  
21 to you. To me, it's a form of torture, Maniscalco said.  
22 He wants to base a Tampa ban on one already approved in  
23 Miami Beach.

24 First of all, is that quote accurate?

25 A. Yes, it is.

1 Q. When you said it's a form of torture, what were  
2 you talking about?

3 A. I think it's a -- it's a harmful practice to  
4 minors -- because this conversion therapy is a ban for  
5 minors so, of course, under eighteen. Because of, you  
6 know, the one gentleman that committed suicide as a  
7 teen-ager, other stories that you read and hear. You  
8 know, beyond -- there's bullying in school. And then  
9 you have this kind of mental abuse that could lead  
10 people down different paths; alcoholism, drug addiction,  
11 even as far as suicide.

12 You know, because, I mean, there's -- there's  
13 the -- you know, the mental torture, I mean, you know.  
14 If someone is too afraid to face their parents, you  
15 know, they could commit suicide. They could numb the  
16 pain with -- you know, with alcohol and drugs, as is  
17 very common. So I think that just all fits into, you  
18 know, what that quote means.

19 Q. What specific, you know, practices, what specific  
20 things done to -- or that may have been done to minors  
21 did you have in mind when you said torture?

22 A. Well, I mean, electroshock therapy which is seen  
23 as -- you know, you don't hear about it as you would  
24 have fifty years ago. But, even one-on-one counseling,  
25 you know, you can have mental and verbal abuse.

1 Because, you know, someone is who they are; and they're  
2 essentially being forced to, you know, think another  
3 way. And...

4 Q. Let me back up to electroshock therapy. I've  
5 heard the term electroshock therapy. I can't say that I  
6 have any idea what that really involves. I mean, do you  
7 know any specifics about that kind of therapy and what's  
8 involved with it?

9 A. No, I do not.

10 Q. And, based on my earlier questions, did you have  
11 any information or knowledge that electroshock therapy  
12 was being performed on minors in Tampa at the time that  
13 you proposed this ordinance?

14 A. No. This is an older practice. It's evolved  
15 over the years.

16 Q. Do you know whether it's done at all anymore in  
17 the context of sexual orientation or gender identity?

18 A. I do not, not in 2018 or 2017.

19 Q. And the second example you gave me was one-on-one  
20 counseling that involved some kind of verbal abuse. Did  
21 I say that correctly?

22 A. Uh-huh.

23 Q. What would be the content of -- at least in your  
24 mind when you use the term torture, what kind of  
25 counseling? What kind of things would be said that

1 would constitute torture, in your mind?

2 A. Well, I mean, take for example a husband and  
3 wife. You know, he never hits her; but he tells her,  
4 you're fat, you're fat, you're fat, you're disgusting,  
5 you're ugly. I -- you know, that's common. You know?  
6 There was never physical abuse. There was verbal.

7 But then you're -- you know, you have a counselor  
8 that says, you know, you're going to burn in hell. You  
9 know, God doesn't forgive this. You know, society  
10 doesn't accept this. It's not normal, you know, two men  
11 together. It's Adam and Eve, not Adam and Steve. I  
12 mean, that's -- it's -- it is mental torture. It's  
13 the -- it's just like being bullied in high school, you  
14 know, being called this or that. And, you know, it's a  
15 form of abuse; and I think it's very harmful. And it's  
16 something that will, you know, psychologically stay with  
17 the person throughout their lives.

18 Q. At the time that you proposed the ordinance, did  
19 you have any knowledge of any of those examples that you  
20 just gave me occurring in the City of Tampa?

21 A. Other than reading and hearing stories, nothing  
22 specific.

23 Q. Had you read stories of those particular things  
24 going on in Tampa?

25 A. No, just in general.

1 Q. Okay. And had you heard from anyone a story of  
2 any of those particular examples you gave going on in  
3 Tampa?

4 A. Kids that I went to high school with and whatnot,  
5 they wouldn't give me specifics of, you know, where they  
6 went. But it would be, you know, my father sent me  
7 away. My parents put me into counseling. Nothing  
8 specific as to, you know, who or -- whomever that  
9 counselor or licensed professional was. But, you know,  
10 their parents were not accepting of, you know, who they  
11 were or said they were. And that's that.

12 Q. Apart from electroshock therapy and one-on-one  
13 counseling that is -- that is verbally or mentally  
14 abusive, as you've explained, were there any other  
15 practices or types of therapy that you had in mind when  
16 you used the word torture to describe conversion  
17 therapy?

18 A. No.

19 Q. And did you have any other practices or therapies  
20 in mind when you actually proposed to move forward with  
21 this ordinance?

22 A. No.

23 Q. So, you know, have you now told me all of the  
24 kinds of practices or therapies that you had in mind  
25 when you used that word torture in this newspaper quote?

1 A. Yes, I have.

2 Q. And have you also now told me all of the  
3 practices or therapies you had in mind when you  
4 originally proposed the Conversion Therapy Ban  
5 Ordinance?

6 A. Yes, I have.

7 Q. You mentioned kids that you knew in high school.  
8 I want to take them one by one. You used the example of  
9 my parents put me in counseling. Did you know someone  
10 in high school who said their parents but them in some  
11 kind of counseling related to sexual orientation or  
12 gender identity?

13 A. Yes.

14 Q. Did you know this in high school, or did you find  
15 this out after?

16 A. In college. In high school, you didn't come out  
17 that you were gay. You know, people felt like they had  
18 more freedom post high school, you know, a bigger -- you  
19 know, a bigger population such as college where you can  
20 blend in with the crowd.

21 Q. What year did you graduate high school?

22 A. 2002.

23 Q. What high school was that?

24 A. Tampa Catholic High School.

25 Q. And so how many of your high school classmates

1 told you that their parents put them in counseling  
2 regarding sexual orientation or gender identity?

3 A. If I recall, two.

4 Q. Let's take them one by one. What did the -- the  
5 first one -- maybe just make it easier. Are these boys?  
6 Girls?

7 A. Both men.

8 Q. Both men. Okay.

9 The first one who told you about this, did he  
10 tell you that his parents put him in counseling against  
11 his will?

12 A. His father put him in counseling against his --  
13 against his will. He would not see -- he would not  
14 accept that his son was gay.

15 Q. And it was clear that this friend of yours did  
16 not want to go to this counseling?

17 A. Yes.

18 Q. And did the friend tell you what happened in the  
19 counseling sessions?

20 A. Other than it was -- it was a very bad experience  
21 for him. That's it. That's all he told me.

22 Q. And do you know whether this was with a licensed  
23 counselor or unlicensed?

24 A. I do not. I never asked those specifics.

25 Q. And do you also know whether this person was part

1 of a religious organization or not?

2 A. I do not know.

3 MR. WILLIAMS: You mean, a member of a  
4 church?

5 MR. GANNAM: Well, start with the broad --  
6 the broadest. And if -- you know, if he had said yes, I  
7 might have narrowed it down.

8 MR. WILLIAMS: Okay. Well, I don't want to  
9 interrupt. But I don't know what a part of a religious  
10 organization -- that could be a lot of things. That's a  
11 little vague. And --

12 MR. GANNAM: I'll clarify.

13 BY MR. GANNAM:

14 Q. Did you know whether the counseling was received  
15 through a person who was an employee or affiliated with  
16 a church?

17 A. I do not know.

18 Q. The second man who you said you knew who  
19 experienced some kind of conversion therapy, what did  
20 that person experience?

21 A. Same thing, being sent off to -- they would call  
22 it -- he would call it treatment. But he never gave  
23 specifics. I never -- I tried to be respectful of their  
24 privacy.

25 Q. The first one -- let me go back -- did he receive

1 his -- his counseling in Tampa?

2 A. I don't know.

3 Q. Okay. Do you know whether he went to any kind of  
4 residential facility where he was away for a period of  
5 time?

6 A. I don't know.

7 Q. What about the second? Do you know where he  
8 received his treatment?

9 A. No, I don't know. I didn't ask.

10 Q. Do you know the details of what that treatment  
11 entailed?

12 A. No.

13 Q. And did you also understand that to have been  
14 against his will?

15 A. Yes on both of them.

16 Q. When did you gain this knowledge? You said it  
17 was in college. Is that generally the timeframe?

18 A. Regarding what?

19 Q. These two men and what they experienced.

20 A. Yeah, college. It was after high school.

21 Q. Okay. At the time you proposed the ordinance --  
22 and I think we've already covered this, and forgive me  
23 if I'm -- if I'm being redundant. But did you -- did  
24 you know whether any of those things that those two men  
25 described to you were being done by licensed counselors

1 in the City of Tampa?

2 A. No, I don't.

3 Q. Do you understand the difference between aversive  
4 and non-aversive therapies to change sexual orientation  
5 or gender identity? Do you know those terms?

6 A. Could you provide the definition?

7 Q. Well, I take it -- is the answer, no, you don't  
8 know what the difference is?

9 A. No. I don't understand the terms. I don't know  
10 the words.

11 Q. You don't know what those terms mean?

12 A. Yeah.

13 Q. Okay. Understood.

14 Prior to today, had you ever heard those terms  
15 before?

16 A. Yes.

17 Q. And had you ever undertaken to find out what  
18 those terms meant before today?

19 A. No, just in reading. But no.

20 Q. When did you see those terms for the first time?

21 A. I don't remember.

22 Q. Do you remember what you were reading?

23 A. I do not.

24 Q. Was it related -- were you reading something in  
25 connection with this lawsuit?

1 A. No. No.

2 Q. Were you reading something in connection with  
3 your sponsoring the therapy ban ordinance?

4 A. I don't remember.

5 Q. Okay. Now, when I say aversive therapy, I'm  
6 referring to therapy that involves some kind of  
7 punishment or reprimand carried out on the client to,  
8 you know, discourage certain thoughts or behaviors.  
9 Does that make sense?

10 A. No. Yeah, I understand. I understand.

11 Q. Okay. And the APA in the report that's  
12 identified in the ordinance, it gives some examples.

13 A. Uh-huh.

14 Q. It talks about them as -- let's see.

15 MR. WILLIAMS: For the record, Roger, you're  
16 talking about the American Psychiatric Association?

17 MR. GANNAM: American Psychological  
18 Association. And I'm referring to the 2009 report  
19 that's cited in the ordinance. And we'll talk about it  
20 more.

21 THE WITNESS: Okay.

22 BY MR. GANNAM:

23 Q. Some examples that the APA gives of aversive  
24 treatment: Inducing nausea, vomiting or paralysis;  
25 providing electric shocks or having the individual snap

1 an elastic band around the wrist when the individual  
2 became aroused to same-sex erotic images or thoughts.  
3 So, based on those examples of kind of, you know,  
4 punitive or reprimanding conduct that's carried out on a  
5 client, did you know -- generally understand what I mean  
6 by aversive therapy?

7 A. Yeah. I mean, I would have seen it as  
8 electroshock or punishment or --

9 Q. Sure.

10 A. -- another term. But I understand.

11 Q. So would it be fair to say that the various kinds  
12 of therapy that you had in your mind when you, you know,  
13 used that word torture speaking in the newspaper and  
14 when you brought this ordinance forward, would it be  
15 fair to say that those would be in that category of --

16 A. Yeah.

17 Q. -- aversive therapies?

18 A. Yes.

19 Q. Now, do you also then understand that there are  
20 therapies that aren't considered aversive in relation to  
21 sexual orientation or gender identity change?

22 A. I would assume that that's, you know, one-on-one,  
23 just verbal counseling.

24 Q. Yeah. So, when I say non-aversive therapy, I'm  
25 -- yeah, that's what I'm referring to.

1 A. Okay. No, I understand.

2 Q. Speaking to a client to ask the client questions,  
3 find out what the client wants, you know, where the  
4 client wants to go, things that don't involve any kind  
5 of punishment or reprimand or shaming or anything like  
6 that.

7 A. Uh-huh.

8 Q. So, when I say non-aversive, you understand I'm  
9 talking about that kind of client-directed --

10 A. Yeah --

11 Q. -- talking?

12 A. -- no, I understand. I understand.

13 Q. This distinction between aversive or  
14 non-aversive, I take it you didn't have those  
15 distinctions in mind when you brought this ordinance  
16 forward?

17 A. I saw it as, you know, psychological torture, to  
18 use that word again, some kind of punishment. I think  
19 the punishment is, you know, minors being put in these  
20 kind of therapies to begin with. I mean, that -- you  
21 talk about, you know, snapping an elastic band or  
22 getting some electroshock therapy. But, you know,  
23 people being put in this against their will by their  
24 parents because, you know -- you have a parent that  
25 could say, you need to stop this, you're going through a

1 phase, stop being gay. It's not -- that's not how it  
2 works. You know? And that's the punishment. If not,  
3 I'm going to send you somewhere. And there's the  
4 punishment in itself.

5 Q. Prior to enacting the ordinance --

6 A. Uh-huh.

7 Q. -- had the City of Tampa received any complaints  
8 that any minor had been harmed by conversion therapy?

9 A. Not to my knowledge.

10 Q. And do you know whether -- since the ordinance  
11 was enacted, whether that has happened?

12 A. Not to my knowledge.

13 Q. And this would be one of the points that I just  
14 want to clarify. When you say, not to your knowledge,  
15 we're talking about the City of Tampa since you're here  
16 testifying for them --

17 A. Yes.

18 Q. -- today. Does the City of Tampa have any  
19 knowledge --

20 A. I don't --

21 Q. -- of any complaints?

22 A. I don't know. Not to my office, I don't know.

23 Q. Is there anyone else in the City of Tampa who may  
24 know more than you when it comes to whether complaints  
25 about harm received from conversion therapy have come

1 into the City?

2 A. I don't know.

3 Q. At the time that you first brought this ordinance  
4 forward and asked for the staff report, did you request  
5 anyone to investigate whether there had been any  
6 complaints in the City of Tampa of harm from conversion  
7 therapy?

8 A. No, I did not. I simply made that request for  
9 information to look at a ban. That was it.

10 Q. And would it have been your expectation in making  
11 that request for the City Attorney's Office or someone  
12 else within the City to conduct that kind of  
13 investigation --

14 A. No --

15 Q. -- to find out?

16 A. -- no. I specifically requested a report on a  
17 conversion therapy ban, and that was it.

18 Q. Do you know whether -- regardless of your  
19 expectations, whether anyone within the City did, in  
20 fact, undertake to investigate whether there had been  
21 any complaints of harm?

22 A. No, I don't know.

23 Q. Apart from complaints of harm, did you have any  
24 knowledge -- did the City have any knowledge at the time  
25 that you proposed this ordinance whether anyone was

1 actually receiving anything that could be called  
2 conversion therapy in the City of Tampa?

3 A. No, not that I know of.

4 Q. All right. In the -- when was the first time  
5 that -- strike that.

6 When the first staff report was prepared at your  
7 request --

8 A. Uh-huh.

9 Q. -- did it -- did the information that came back  
10 to you include any information about whether there had  
11 been harm or whether there had even been any conversion  
12 therapy happening in Tampa?

13 A. No. The request was specifically looking at a  
14 ban and looking at other municipalities to see how  
15 they've done it, you know, to use it as a template. But  
16 that was -- that was the nature of the request.

17 Q. Did the City ever receive any evidence in the  
18 process of -- from proposing the ordinance to its  
19 enactment, during that period of time, did the City  
20 receive any evidence of harm occurring as a result of --

21 A. I don't know.

22 Q. -- conversion therapy?

23 A. I don't know.

24 MR. WILLIAMS: Well, let me clarify that  
25 because there are public hearings. Are you including

1 the public hearings?

2 MR. GANNAM: I'm just asking did the City  
3 receive any evidence.

4 BY MR. GANNAM:

5 Q. Were you part of -- were you present at all of  
6 the City Council meetings where this ordinance was  
7 discussed and voted?

8 A. Yes, at all of the discussions.

9 Q. And, during the course of any of those meetings,  
10 did the City receive any evidence of harm resulting from  
11 sexual orientation change efforts or gender identity  
12 change efforts?

13 A. I don't know.

14 Q. And, when I say did the City receive evidence,  
15 I'm talking about did anyone stand up and say  
16 anything --

17 A. Oh --

18 Q. -- for the consideration of the Council?

19 A. -- at the public hearing?

20 Q. Right --

21 A. Yeah --

22 Q. -- or at any point during those meetings.

23 A. -- people did speak because it was a public  
24 forum, and people had three minutes to speak. And there  
25 were several personal stories of, you know, what they

1 had gone through.

2 Q. And all of those statements would be a part of  
3 the official record, correct?

4 A. Yes, and in support of this ban.

5 Q. And so, if there is -- apart from what people  
6 said during the public comment period, did any member of  
7 the City Council call a witness to testify regarding the  
8 conversion therapy ban?

9 A. No.

10 Q. Is that a process that you're familiar with? Do  
11 you have the ability as a City Council member to  
12 actually bring a particular witness to come up and  
13 present information to council members?

14 A. The only thing we can do is have someone come and  
15 speak about their organization. Unrelated to this. You  
16 know, talk about the cancer hospital. You know? And  
17 they'll come and, you know, discuss. But those are just  
18 in general. But I've never called a witness. And,  
19 since I've been there, I've never seen a witness get  
20 called.

21 Q. Okay. Fair enough.

22 So, in connection with the conversion therapy  
23 ordinance, no member of the council actually called a  
24 witness to --

25 A. No.

1 Q. -- to bring out testimony?

2 A. No, no, no.

3 Q. So, apart from the statements made to the council  
4 during the various public comment periods related to  
5 this ordinance, was there any other information shared  
6 with the council members relating to this ordinance  
7 before it was enacted?

8 A. No, other than the information that we requested,  
9 you know, how municipalities do it and moving forward  
10 with it. That was it.

11 Q. Apart from what happened at the meetings,  
12 themselves, did you, as a City Council member, receive  
13 any written communications from constituents, advocacy  
14 organizations, anyone at all, either -- you know, urging  
15 you to pass it or not pass it?

16 A. There may have been letters of support sent. But  
17 people -- people came and spoke in support or in  
18 opposition. I mean, everything was done in the public  
19 forum. Some meetings were busier than others.

20 Q. Did you personally receive any e-mails as a City  
21 Council member indicating either support or opposition  
22 to the ordinance?

23 A. I don't remember any specifically being sent to  
24 me.

25 Q. Is there a way for a member -- or for a member of

1 the public or anyone, for that matter, to send an e-mail  
2 that goes to all the Council members at one time?

3 A. Yes. You can send it to Tampa City Council so  
4 everybody gets the same copy.

5 Q. Okay. So, if the e-mail is sent to Tampa City  
6 Council, everyone gets it?

7 A. Yeah. Please support this or please oppose this,  
8 thank you. Signed, so and so.

9 Q. And those messages are logged by someone within  
10 the City?

11 A. Yes.

12 Q. Do you know who maintains those logs?

13 A. The clerk's office. I don't know who  
14 specifically there, but the clerk handles all the  
15 communications.

16 Q. Do you receive copies of those logs or summaries,  
17 you know, this many people said yes, this many people --

18 A. No --

19 Q. -- said no?

20 A. -- no, no.

21 Q. Could you obtain it if you wanted to?

22 A. You would do a public records request, and it  
23 would be general. And then it would be up to you to  
24 sort through them one by one.

25 Q. I understand. I mean, you, as a council member.

1 Do you have the ability to phone someone and say, hey,  
2 can you send me a report of all the messages that came  
3 in about --

4 A. I don't know. I've never asked.

5 Q. Okay. So you don't recall any specific e-mails  
6 about this ordinance that you yourself read; is that  
7 correct?

8 A. I do not.

9 Q. And I take it you don't know what any other  
10 individual council member read or didn't read in  
11 connection with their individual consideration?

12 A. If they were sent directly to a council member,  
13 no.

14 Q. Okay.

15 A. No, we don't have access to their personal  
16 e-mails.

17 Q. And I take it you haven't discussed with other  
18 council members what e-mails they read or don't read?

19 A. No, no. We are -- due to the Sunshine Laws, we  
20 can't discuss anything privately. Everything has to be  
21 at the public meeting or public forum at a council  
22 meeting.

23 Q. And so that means you can't have a discussion  
24 with a fellow council member about this ordinance unless  
25 you give a public notice that there's going to be a

1 meeting and then have that meeting out in the public?

2 A. Yeah. And those were only held at the City  
3 Council meetings in view of cameras and the public.  
4 That's the only time we can discuss it legally.

5 Q. So there were no other -- no other, you know,  
6 I'll call them Sunshine meetings outside of the --

7 A. No.

8 Q. -- normal City Council meetings --

9 A. Everything was held in City Hall, publicly  
10 noticed, you know, regular City Council meetings.

11 Q. Now, as a council member, I take it you're free  
12 to have private conversations with constituents or --

13 A. Yes.

14 Q. -- or advocates or anything like that, correct?

15 A. Yes.

16 Q. Did you have private conversations with  
17 constituents regarding this ordinance?

18 A. No. I didn't take any meetings. I don't -- I  
19 don't believe I had any requests for meetings.

20 Q. If you had had a meeting, would that be logged on  
21 a document somewhere?

22 A. Yes.

23 Q. Where would that be logged?

24 A. Our calendars are public so you can see who met  
25 with whom. But, on this issue, I didn't meet with

1 anybody.

2 Q. Okay. Did you have any telephone calls with  
3 constituents --

4 A. No.

5 Q. -- regarding this ordinance?

6 Did you have any telephone calls with anyone at  
7 all regarding this ordinance?

8 A. No. Everybody came publicly and spoke about it.  
9 Once this article came out, you know, the public knew;  
10 and that's when people started showing up, you know, for  
11 and against.

12 Q. So you didn't take any meetings. You didn't have  
13 any telephone conversations. Did you have any other  
14 kinds of communications with constituents or anyone at  
15 all, for that matter, about this ordinance during that  
16 time from when you proposed it to its enactment?

17 A. No. Everybody came publicly before City Council.

18 Q. Would it be fair to say that, if it didn't happen  
19 during one of those City Council meetings as part of the  
20 official record, it wasn't something that you considered  
21 in connection with this ordinance?

22 A. No. Everything was done out in the open. No  
23 City Hall meetings, office meetings, phone calls,  
24 nothing like that.

25 Q. Okay.

1 (Plaintiffs' Exhibit No. 7 marked for identification)

2 BY MR. GANNAM:

3 Q. I'm showing you a document that's been marked as  
4 Plaintiffs' Exhibit 7. For the record, this was  
5 produced by the City, Bates number COT PRODUCTION  
6 005122.

7 A. Uh-huh. See how it's addressed to Tampa City  
8 Council, so it's sent to everybody.

9 Q. So you've identified this as an e-mail that was  
10 sent to the Tampa City Council?

11 A. Yes.

12 Q. And that's based on the "to" field reading Tampa  
13 City Council, all one word?

14 A. Yes.

15 Q. That's how it would normally look if it was sent  
16 to the whole council?

17 A. Yeah. You send this to all seven members.

18 Q. Do you know who the sender, Erica Dotson, is?

19 A. I do not.

20 Q. The date of this is February 20, 2017.

21 A. Uh-huh.

22 Q. That would have been during that period of time  
23 that this ordinance was being considered by the council,  
24 correct?

25 A. Yes.

1 Q. Now, since this says it was sent to the Tampa  
2 City Council, upon seeing it, does it refresh your  
3 recollection whether you've ever seen this before?

4 A. It does not.

5 Q. Would you have any reason to believe that you did  
6 not receive this based on the fact that it was sent  
7 to --

8 A. No. If it was sent to us --

9 (Interruption by the court reporter)

10 THE COURT REPORTER: Would you have any  
11 reason to believe that you did not receive this based on  
12 the fact that it was sent --

13 BY MR. GANNAM:

14 Q. -- to the Tampa City Council e-mail address?

15 A. No.

16 Q. And, now, would it be fair to say that you --  
17 strike that.

18 If it was sent to the Tampa City Council e-mail  
19 address and, therefore, you received it, do you believe  
20 that you read this when you received it?

21 A. I may have.

22 Q. Okay. But you can't say for sure?

23 A. I don't remember this -- seeing this specific  
24 e-mail.

25 Q. Okay. I'm going to draw your attention to the

1 opening sentences. Says, my name is Erica Dotson; and I  
2 consider myself a part of the LGBT community. Although  
3 I do not know anyone who has been through conversion  
4 therapy, I believe that conversion therapy is something  
5 that minors should not be forced to go through.

6 Let me stop there. Now, reading that out loud,  
7 does it help you remember whether you saw this before?

8 A. It does not.

9 Q. Okay. So do you have any reason to believe that  
10 you would have responded or followed up with Ms. Dotson  
11 about what she sent to you here?

12 A. No. I don't respond to e-mails ninety-nine  
13 percent of the time.

14 Q. Is that just a -- your common practice as a City  
15 Council member?

16 A. Yeah. I mean, sometimes we get a thousand  
17 e-mails on a rezoning case. And, I go, okay, I got it.  
18 You know, people are mad. But I generally don't -- you  
19 know, the most I respond is thank you for writing. I  
20 appreciate your e-mail. You know, try to be polite.  
21 But -- or we'll look into that if they have a  
22 neighborhood issue. But I just don't respond. Just how  
23 I am.

24 (Plaintiffs' Exhibit No. 8 marked for identification)

25 BY MR. GANNAM:

1 Q. I'm handing you a document that I'll mark as  
2 Plaintiffs' Exhibit 8. For the record, this was  
3 produced by the City as COT PRODUCTION 003883. This is  
4 also an e-mail with the same recipient, Tampa City  
5 Council, from it appears to be Leslie Reed --

6 A. Uh-huh.

7 Q. -- dated March 2, 2017.

8 Now, the date, March 2, 2017, is also within the  
9 period of time that the ordinance was being considered,  
10 correct?

11 A. Yes.

12 Q. And this e-mail, the -- again, just going to the  
13 first couple of sentences. I am writing to urge the  
14 council to strongly support the ban on conversion  
15 therapy for minors. It is a barbaric and damaging  
16 practice that often includes forced shock treatment.

17 Let me stop there. Do you recall having seen  
18 this e-mail?

19 A. I may have seen it, but I don't remember  
20 specifically.

21 Q. Okay. Do you recall whether you followed up or  
22 responded to this e-mail?

23 A. No, I didn't respond.

24 Q. Let me just move to the next one.

25 (Plaintiffs' Exhibit No. 9 marked for identification)

1 BY MR. GANNAM:

2 Q. Handing you a document I'm marking as Plaintiffs'  
3 Exhibit 9.

4 A. Thank you.

5 Q. This is a document produced with the Bates number  
6 COT PRODUCTION 003881. It is also an e-mail to Tampa  
7 City Council. It is from Tea or Tea Sefer. And it  
8 appears to be on behalf of GLSEN, G-L-S-E-N, Tampa Bay.  
9 It's dated March 2, 2017. First, is that date also  
10 within the time period that the ordinance was being  
11 discussed?

12 A. Yes.

13 Q. And have you ever seen this communication before?

14 A. I don't remember specifically, no.

15 Q. Are you familiar with the organization GLSEN?

16 A. I'm not.

17 Q. Prior to today, had you ever heard of GLSEN  
18 before?

19 A. No.

20 Q. I want to look at the third paragraph. It reads,  
21 conversion therapy, also known as reparative therapy, is  
22 a set of discredited practices that use rejection, shame  
23 and psychological abuse aimed at changing one's sexual  
24 orientation or gender identity slash expression.

25 Now, having read that, does it refresh your

1 recollection whether you saw this in connection with the  
2 ordinance?

3 A. I don't remember.

4 Q. Do you have any reason to believe that you  
5 responded or followed up to GLSEN in any way --

6 A. No.

7 Q. -- as a result of this?

8 A. No, no.

9 Q. So we've now just gone through several e-mails.  
10 I don't represent that these are all the ones sent to  
11 the Tampa City Council, but they are just examples.  
12 Having seen those, do you remember at all receiving any  
13 e-mails as a City Council member in connection with the  
14 ordinance, either for or against it?

15 A. I don't remember, but I'm sure I did.

16 Q. And, just so I'm clear, it's addressed to Tampa  
17 City Council, as all of these examples were. Those  
18 would have been e-mails that were at least sent to all  
19 of the Council members?

20 A. Yes.

21 Q. Whether or not any of them actually read them, we  
22 don't know?

23 A. I don't know. I mean, I get so many e-mails. I  
24 just -- you know, it's been already almost two years. I  
25 don't -- you know, I don't specifically remember.

1 Q. And would there be any way to know whether any  
2 individual council member read an e-mail like this  
3 without asking the individual council member?

4 A. No. No, it's not -- you don't see, like, you  
5 know, e-mail read at that time or opened or -- it  
6 doesn't -- it doesn't do that.

7 MR. GANNAM: Okay. We've been going about  
8 an hour. Can we just take a break for five minutes.

9 (Recess)

10 BY MR. GANNAM:

11 Q. All right. Mr. Maniscalco, I'm going to move on  
12 to some other exhibits here. I'll mark this next one as  
13 Exhibit 10.

14 (Plaintiffs' Exhibit No. 10 marked for identification)

15 BY MR. GANNAM:

16 Q. All right. This is an e-mail produced by the  
17 City at COT PRODUCTION 004037. The date is February 16,  
18 2017. It's from Carrie Henriquez with an e-mail address  
19 @tampagov.net. And it's to Nadine@eqfl.org; subject,  
20 conversion therapy for minors ban, Tampa City Council.

21 A. Uh-huh.

22 Q. First of all, who is Carrie Henriquez?

23 A. She is my legislative aide.

24 Q. And what does that position entail?

25 A. I don't want to say like a secretary. But she'll

1 set up meetings, you know, handles my calendar. I mean,  
2 that's really it. I don't ask her to make coffee or  
3 anything like that.

4 Q. Is she an employee of the City of Tampa?

5 A. Yes.

6 Q. And does she act as a legislative aide to any  
7 other council member?

8 A. No, just myself.

9 Q. And have you seen this particular communication  
10 before?

11 A. I have not.

12 Q. Do you know who Nadine@eqfl.org is?

13 A. Nadine I assume is Nadine Smith at  
14 @eqflflorida (sic) is Equality Florida. She's I think  
15 the statewide director or -- you know, she handles a big  
16 area.

17 Q. Did you have any communications yourself with  
18 Equality Florida in connection with the ordinance?

19 A. No.

20 Q. Do you know what -- are you familiar with what  
21 Carrie was seeking from Equality Florida with this  
22 e-mail?

23 A. I mean, reading this, I have not seen this e-mail  
24 before. To get people to the meeting, I guess, or put  
25 the word out there. But, at this point, it was -- it

1 was already in the -- in the newspaper.

2 Q. The third paragraph begins, we really need  
3 Equality Florida's support in passing this ban. Did I  
4 read that correctly?

5 A. Yes.

6 Q. Did you direct Ms. Henriquez to get in touch with  
7 Equality Florida to solicit their support?

8 A. I did not.

9 Q. Is it part of her job responsibilities to solicit  
10 support for legislation that you propose?

11 A. No. This is, I think, the -- the one piece of  
12 legislation that I -- that I have -- I think it's the  
13 only thing that I've proposed thus far being elected.

14 Q. Did you know Ms. Henriquez was reaching out to  
15 Equality Florida?

16 A. I did not.

17 Q. Did she ever -- before you read this e-mail, did  
18 you know that she had ever done that?

19 A. No, I did not.

20 Q. Did you and Ms. Henriquez ever discuss Equality  
21 Florida in connection with this ordinance?

22 A. I don't remember --

23 MR. WILLIAMS: You mean, at the time it was  
24 being enacted? That period of time?

25 BY MR. GANNAM:

1 Q. Well, I'm asking have you ever discussed it with  
2 Ms. Henriquez?

3 MR. WILLIAMS: Well, let's make it clear. I  
4 think the Court's order is very clear that we're talking  
5 October 1, '16, through December 15, 2017. I will  
6 advise you that that's the timeframe that the Court has  
7 ascribed to this deposition.

8 BY MR. GANNAM:

9 Q. If you can -- if you can sort of separate your  
10 memories on one side of December 17, 2017, and  
11 everything before that and everything after that. Did  
12 you have any conversations with Ms. Henriquez about  
13 Equality Florida prior to mid December 2017?

14 A. Not that I recall, no.

15 Q. Seeing this e-mail, do you approve of  
16 Ms. Henriquez reaching out to an organization like  
17 Equality Florida to solicit support for your ordinance  
18 that you proposed?

19 A. I don't see it out of the ordinary. You know,  
20 kind of like -- you know, not rally the troops but, you  
21 know, to put the word out there that this is happening.  
22 I mean, Equality Florida, with my -- with what I'm  
23 familiar with, this is -- this is something that they  
24 champion. I mean, it would be any LGBT issues, which  
25 this would fall under their purview. So I think it's

1 just, you know, putting the word out there. And, at  
2 this point, the newspaper article has already come out.  
3 You know? But this -- this is the first time that I'm  
4 seeing this e-mail.

5 Q. What other -- besides this e-mail, what other  
6 communications did the City of Tampa have with Equality  
7 Florida in connection with the passage of this  
8 ordinance?

9 A. I think this is it. I don't know of anything  
10 else.

11 Q. What about the City and the Southern Poverty Law  
12 Center?

13 A. That, I don't know. I've never communicated with  
14 them.

15 Q. And do you know whether anyone on behalf of the  
16 City has communicated with SPLC?

17 A. No. That name never -- that group's name never  
18 comes up.

19 Q. What communications did the City of Tampa have  
20 with the NCLR, National Center for Lesbian Rights, in  
21 connection with this ordinance?

22 A. Nothing that I'm aware of. I never have.

23 Q. And, as the City's designee to testify regarding  
24 item 7 in the deposition notice, which is all  
25 communications and coordination between Defendant and

1 Equality Florida and, as modified by the Court order,  
2 also SPLC and NCLR regarding the ordinance, is it your  
3 testimony that you're not aware of any other  
4 communication between the City and any of those  
5 organizations in connection with the ordinance?

6 A. That is correct. The only thing is this e-mail  
7 here.

8 Q. Are you aware of any communications between the  
9 City and a man named Rand Hoch in Palm Beach County  
10 regarding this ordinance?

11 A. No, I'm not.

12 Q. Have you personally ever had any conversations  
13 with Mr. Hoch about the ordinance?

14 A. No. I don't even know who he is.

15 Q. Okay. So, when you look at this e-mail from  
16 Ms. Henriquez with -- you're writing to Equality  
17 Florida. She signs it with her Tampa City Council  
18 Legislative Aide to Councilman Guido Maniscalco,  
19 District 6. Do you consider this to be a communication  
20 between the City and Equality Florida?

21 A. It's coming from a legislative aide, you know,  
22 somebody that works as an assistant at my office. It  
23 wasn't from my direction or the direction of the City.  
24 I think this was -- I don't know. I mean, I don't -- I  
25 don't see it out of the ordinary. Just we need your

1 support is, you know, pass-the-word kind of thing.

2 Q. Now, Ms. Henriquez, does she have any authority  
3 to act beyond whatever duties she has to serve you as  
4 your legislative aide?

5 A. I mean, she has freewill to write an e-mail like  
6 this. I mean, I just -- it's her trying to be helpful.  
7 You know? But that's -- that's really it.

8 Q. Would you agree with me that this is an e-mail  
9 that she has written to aid your legislation, your  
10 ordinance?

11 A. Since I'm the one that proposed it, yes.

12 Q. Do you know whether Nadine Smith or the Nadine  
13 addressed here responded to Ms. Henriquez?

14 A. I don't know.

15 (Plaintiffs' Exhibit No. 11 marked for identification)

16 BY MR. GANNAM:

17 Q. All right. I'm marking a document as Plaintiffs'  
18 11. This is an e-mail dated February 10, 2017.

19 A. Uh-huh.

20 Q. It shows from  
21 annie.greenspan@thetrevorproject.org to Carrie Henriquez  
22 regarding conversion therapy ordinance. Do you  
23 recognize this e-mail?

24 A. I do not.

25 Q. Do you know who The Trevor Project is?

1 A. I do not.

2 Q. So, prior to this moment, have you ever seen this  
3 e-mail before?

4 A. No, because it's addressed to her; and I don't  
5 have access to her e-mail.

6 Q. But this is Carrie's --

7 A. That is her --

8 Q. -- work e-mail, correct?

9 A. Yes, it is.

10 Q. Do you have a policy regarding use of the  
11 Tampgov.net e-mail account for personal use?

12 A. No. Everything is -- all work-related stuff goes  
13 to -- anything that's with the City goes to the tampgov  
14 e-mails.

15 Q. I guess my question is: Does the City of Tampa  
16 have a policy or do you have a policy with respect to  
17 Ms. Henriquez prohibiting her from using her  
18 tampgov.net e-mail account for personal use?

19 A. No, I don't.

20 Q. You don't have a policy?

21 A. No. I mean, we just assume everything  
22 work-related goes through there; and that's it. No need  
23 to have, you know, other ones.

24 Q. And so am I correct then that -- or strike that.  
25 Did Ms. Henriquez have your authority or approval

1 to -- to communicate with The Trevor Project about this  
2 ordinance?

3 A. I never told her to go ahead and -- I don't  
4 know -- since, you know, before this e-mail, I've never  
5 heard of The Trevor Project. But this is an e-mail to  
6 her. Okay, we spoke a few weeks ago. I don't know if  
7 she had called the office by telephone. I don't know.

8 Q. Would it be fair to say that, again with this  
9 e-mail, that Ms. Henriquez was communicating with The  
10 Trevor Project on your behalf?

11 A. As representing my office and me being the one  
12 that proposed this, you know, I would say yes.

13 (Plaintiffs' Exhibit No. 12 marked for identification)

14 BY MR. GANNAM:

15 Q. All right. I'm showing you Plaintiffs' Exhibit  
16 12. This is a string of e-mails produced in this case  
17 at COT PRODUCTION 005221.

18 A. Uh-huh.

19 Q. Going to the earliest e-mail which starts about  
20 halfway down the page.

21 A. Uh-huh.

22 Q. I think you'll see it's the same e-mail --

23 A. Yes.

24 Q. -- involved in Plaintiffs' Exhibit 10; is that  
25 correct?

1 A. Yes, it is.

2 Q. And so appearing directly above that, looks like  
3 it is a response from Nadine Smith to Carrie Henriquez  
4 and Dan Benoit dated February 16, 2017. Do you see  
5 that?

6 A. I see it, yes.

7 Q. And it reads, Hi Carrie. Thanks for reaching  
8 out. I've cc'd Dan Benoit to help set up a time to  
9 talk, best, Nadine. Did I read that correctly?

10 A. Yes, you did.

11 Q. Does this confirm that it is, in fact,  
12 Nadine Smith of Equality Florida whom Carrie was  
13 communicating with?

14 A. Yes. That's who signed the e-mail.

15 Q. And do you know who Dan Benoit is?

16 A. I do not.

17 Q. And, when Nadine writes, I've cc'd Dan Benoit to  
18 help set up a time to talk, do you know whom she's  
19 intending to talk to?

20 A. May have been Carrie. I mean, Carrie wrote the  
21 e-mail, and she put her office number and -- well, the  
22 office number and her personal cell. So it would be --  
23 I would assume it would be with them.

24 Q. And, having read this, does this refresh your  
25 recollection as to whether you ever arranged or attended

1 any kind of meeting --

2 A. No.

3 Q. -- with Nadine Smith?

4 A. No, I never did. I never met with Nadine or Dan.

5 Q. Did you ever talk with them on the phone --

6 A. I don't --

7 Q. -- in connection with the ordinance?

8 A. No, no.

9 Q. And do you know what happened after this e-mail  
10 as far as whether any kind of meeting occurred without  
11 you in connection with the ordinance?

12 A. No. My aide doesn't meet with people like that  
13 on my behalf. So they would have never walked into City  
14 Hall or met for coffee or anything.

15 Q. She could have talked with them on the phone,  
16 right?

17 A. That is possible, but I don't remember of any  
18 phone conversation.

19 Q. Now, Ms. Henriquez doesn't keep a log of all of  
20 her phone conversations, does she?

21 A. No. Nobody does.

22 Q. And, if she had a conversation with someone from  
23 Equality Florida and you weren't in the room with her,  
24 would you have any reason to know whether she spoke to  
25 them or not?

1 A. No, unless I was witness, which I was not. So,  
2 as far as I know, no.

3 (Plaintiffs' Exhibit No. 13 marked for identification)

4 BY MR. GANNAM:

5 Q. Showing you Plaintiffs' Exhibit 13. It's another  
6 e-mail string produced by the City at COT PRODUCTION  
7 005224. The earliest e-mail in this string begins  
8 halfway down the second page. I think you'll see it's  
9 the same e-mail that we discussed in Plaintiffs' Exhibit  
10 10.

11 A. Yes.

12 Q. And then directly above that is the response from  
13 Nadine Smith that we just discussed in Plaintiffs'  
14 Exhibit 12.

15 A. Yes.

16 Q. And then we see an additional message in the  
17 string, actually starts at the bottom of the first page,  
18 from Stratton Pollitzer to Nadine Smith,  
19 hannah@eqfl.org, cc to Carrie Henriquez and Dan Benoit.

20 A. Wait, wait. Where do you -- oh, Hanna up top.  
21 Okay.

22 Q. I'm sorry. Looking at the very bottom of the  
23 first page --

24 A. Okay.

25 Q. -- it's the next message in the string, you know,

1 because these go from back to front in time.

2 A. Okay.

3 Q. It's from Stratton Pollitzer, February 16, 2017,  
4 to Nadine Smith, Hannah and cc to Carrie Henriquez and  
5 Dan Benoit. Do you see that?

6 A. The only time I see -- oh, I see Hannah. Okay.  
7 I'm sorry. I do see it at the bottom of the page.

8 Q. Do you know who Stratton Pollitzer is?

9 A. I do not.

10 Q. And then, in the first sentence of the body of  
11 the e-mail, it says, I'm also looping in Hannah Willard,  
12 our public policy director. Do you know who that is?

13 A. I do not.

14 Q. Okay. The next message in the string appearing  
15 above this one on the first page about two-thirds of the  
16 way down, says, please send the cavalry, from  
17 Carrie Henriquez. Do you see that?

18 A. I do.

19 Q. Do you know what Ms. Henriquez is talking about?

20 A. When one says send in the cavalry --

21 MR. WILLIAMS: Don't speculate. He asked  
22 you if you know.

23 THE WITNESS: You know, I don't...

24 BY MR. GANNAM:

25 Q. What do you understand that to mean as you read

1 it?

2 A. Send people, I would assume.

3 Q. The timing of this e-mail is February 16, 2017.

4 Did you have any -- had you given any particular  
5 directive or instructions to Ms. Henriquez to drum up  
6 support for the ordinance?

7 A. No.

8 Q. Did you have any notion at that time whether  
9 support was needed to get the ordinance passed?

10 A. I think, once the newspaper article came out --  
11 because that's how the -- the opposition, people  
12 opposing this, got wind of all this. So, you know,  
13 through the media, people found out. Then social media.  
14 And you know how news travels.

15 Q. So, prior to today, had you ever seen these  
16 communications before?

17 A. No.

18 (Plaintiffs' Exhibit No. 14 marked for identification)

19 BY MR. GANNAM:

20 Q. This is Plaintiffs' 14 I just showed you.  
21 Produced at COT PRODUCTION 003943. This is another  
22 e-mail string.

23 A. Uh-huh. Where do we start?

24 Q. That's a good question. Let me see. It's four  
25 pages. I just want to start with the message -- let's

1 just start with the top message, which would be the  
2 latest one in the string on the first page, from  
3 Carrie Henriquez to Hannah Willard, Kaitlin Connolly,  
4 March 2, 2017. Also copied on the e-mail,  
5 Mark Puskarich --

6 A. Uh-huh.

7 Q. -- Amber Paoloemilio --

8 A. Uh-huh.

9 Q. -- Brittany Link.

10 First of all, do you recognize who any of those  
11 people are?

12 A. Mark Puskarich I have met in the past.

13 Q. You ever speak to him in connection with this  
14 ordinance?

15 A. No, not until after the fact. I met him after  
16 all this.

17 Q. After the ordinance was passed?

18 A. Yes.

19 Q. And did you -- was the purpose of your meeting or  
20 the occasion for the meeting the ordinance?

21 A. Oh, no. It was at a social event.

22 Q. Did you discuss the ordinance at that time?

23 A. No.

24 Q. So the body of this latest e-mail in the string  
25 on the first page, it begins, update, the draft

1 ordinance motion passed unanimously a few minutes ago.  
2 Moves to first reading two weeks from today.

3 So, just so I'm clear in the process, there was a  
4 vote to move the ordinance to the first reading --

5 A. Yes.

6 Q. -- and that passed unanimously, correct?

7 A. Yes.

8 In this e-mail at this point, it's the draft.  
9 City Council agreed on the language; and we voted to  
10 move it to first reading, which shows there March 16th.

11 Q. Now, the last sentence of that first paragraph  
12 reads, if all goes smoothly and we don't lose majority  
13 support, this baby passes on the 6th of April,  
14 exclamation point.

15 First, have you ever seen this communication  
16 before?

17 A. No.

18 Q. Do you know who Ms. Henriquez is referring to  
19 when she says, "we," in that phrase we don't lose  
20 majority support?

21 A. The City Council, the people that are voting on  
22 this.

23 Q. At that point in time, did you have reason to  
24 believe that there was majority support on the City  
25 Council for final passage of the ordinance?

1 A. Oh, well, when we voted to move forward with the  
2 draft ordinance to first reading, it was a unanimous yes  
3 vote.

4 Q. The second paragraph says, so now we need even  
5 more hands on deck. Would it be possible to pow wow  
6 sometime next week in preparation of the March 16th  
7 meeting?

8 Did I read that correctly?

9 A. You read that correctly, yes.

10 Q. Do you know what pow wow Ms. Henriquez was  
11 referring to?

12 A. I don't know. I didn't attend any pow wow.

13 Q. Do you understand that to mean some kind of  
14 meeting?

15 A. Or gathering.

16 Q. Do you know whether Ms. Henriquez did, in fact,  
17 meet or pow wow with these folks in this communication?

18 A. No. She didn't tell me anything.

19 Q. But did you tell me that she does not meet with  
20 people?

21 A. Yeah. If -- if she's in a meeting -- if I'm in  
22 the meeting, if she's -- you know, she shows up to take  
23 notes and whatnot. But not, you know, her going solo on  
24 her own, no.

25 Q. And so did you have any kind of meeting with the

1 people involved in this communication?

2 A. No, because I've never met Hannah, Amber,  
3 Brittany, any of these.

4 Q. Go down to the immediately preceding message in  
5 the string, and it starts at the bottom of page one --

6 A. Uh-huh.

7 Q. -- from Hannah Willard to Kaitlin Connolly,  
8 copies to Carrie, Mark, Amber and Brittany. Do you see  
9 that?

10 A. Yes, I do.

11 Q. And it reads, more resources from SPLC are  
12 attached. Then it says, as for survivors slash  
13 providers, we are checking and will let you know ASAP if  
14 anyone is available to attend the hearing.

15 Do you know what that's referring to?

16 A. Well, SPLC is, what, Southern Poverty Law Center?

17 Q. Okay.

18 A. I've never communicated with them.

19 Q. Do you know what resources from SPLC are referred  
20 to in the e-mail?

21 A. I do not.

22 Q. Did you ever review materials provided by SPLC or  
23 that were created by SPLC in connection with this  
24 ordinance?

25 A. No, only what I specifically asked from the City

1 in the original staff report. When I made the original  
2 motion, I stuck with whatever they provided.

3 Q. What about this statement in the second sentence,  
4 as for survivors slash providers, we are checking and  
5 will let you know ASAP if anyone is available to attend  
6 the hearing, do you know what that's referring to?

7 A. I would think it's people to come and speak in  
8 their support or share their stories.

9 Q. And still, at this point on March 2nd, did you  
10 have any knowledge that Ms. Henriquez was communicating  
11 with Equality Florida, looking at materials from SPLC,  
12 being involved in organizing people to attend hearings?  
13 Did you have any knowledge of any of this?

14 A. No, because it was all through her e-mail and I'm  
15 not cc'd; and I don't have access to it, no.

16 Q. And did she ever tell you about it?

17 A. No.

18 Q. Okay. In connection with the passage of the  
19 ordinance?

20 A. No, other than the days of the hearings, you  
21 know, there's a lot of people here. You know? We look  
22 at the crowd size before we start meetings. Yeah. So  
23 you see how long public comment is going to go for.

24 MR. WILLIAMS: "We," being the City Council?

25 THE WITNESS: Yeah, City Council members.

1 (Plaintiffs' Exhibit No. 15 marked for identification)

2 BY MR. GANNAM:

3 Q. Handing you what I've marked as Exhibit 15. This  
4 is produced at COT PRODUCTION 003941. It's another  
5 e-mail string.

6 A. Where do we start?

7 Q. Let's look at the way this message at the top of  
8 the page.

9 A. Uh-huh.

10 Q. It's from Hannah Willard to Carrie Henriquez. It  
11 reads, hey Carrie, congratulations on an amazing victory  
12 yesterday.

13 Let me stop there. The date is April 7, 2017.  
14 Do you know what amazing victory is being referred to  
15 here?

16 A. That would be -- City Council meetings are always  
17 held on Thursdays. So Thursday, April 6th, is the day  
18 before this e-mail. And that was when it moved to -- it  
19 was approved unanimously in the second vote and goes to  
20 the mayor for his signature, to sign the ordinance.

21 Q. So this was the final act of the City Council  
22 that passed the ordinance --

23 A. Yes.

24 Q. -- that had just occurred the day before?

25 A. Yes.

1 Q. The next sentence says, a unanimous vote, wow.  
2 Your leadership on this has been just incredible, and  
3 I'm so grateful we got to be a part of it.

4 Do you know what leadership of Carrie Henriquez  
5 is being referred to by Ms. Willard?

6 A. I mean, the leadership is on my part because I  
7 proposed it. I think the credit should go to me for  
8 bringing it up. I think it was just a compliment.

9 Q. Did you have any knowledge of this communication  
10 before today?

11 A. No. I don't have access to her e-mails, and I  
12 can't -- I can't see these.

13 Q. So do you believe that Ms. Willard is -- when she  
14 said, "your leadership," is referring generally to your  
15 office?

16 A. Yeah, I think so, as a generalization.

17 Q. Where she says, I'm so grateful we got to be a  
18 part of it, what is the City's position on what part  
19 Equality Florida played in the passage of the ordinance?

20 A. I think it was for people coming out to speak  
21 during public comment.

22 Q. Anything else?

23 A. No, that's really it. It was just those public  
24 meetings and unanimous approval all the way through. I  
25 think the vote always stayed the same.

1 Q. Did anyone from Equality Florida ever lobby you  
2 directly to take any particular action in connection  
3 with this ordinance?

4 A. No. They spoke with me at the public hearing  
5 during public comment, meaning, they spoke to us as a  
6 City Council body.

7 Q. And do you know whether anyone on behalf of  
8 Equality Florida directly communicated with any other  
9 council member outside of a public meeting in connection  
10 with the ordinance?

11 A. I do not believe so. I think they all showed up  
12 publicly to speak during the public meetings.

13 Q. And so, when Ms. Willard says, I'm so grateful we  
14 got to be a part of it, is there any other activities by  
15 Equality Florida that were part of getting the ordinance  
16 passed besides speaking at the public meetings and  
17 whatever e-mail communications they had with  
18 Ms. Henriquez that we've been looking at?

19 A. No, this would be it. It would be like  
20 organizing a protest in a park. That would be the --  
21 you know, we being a part of it. You know, people  
22 coming together.

23 (Plaintiffs' Exhibit No. 16 marked for identification)

24 BY MR. GANNAM:

25 Q. I'm handing you Exhibit 16. This is an e-mail --

1 MR. WILLIAMS: 16, Roger?

2 MR. GANNAM: Yeah, 16.

3 BY MR. GANNAM:

4 Q. An e-mail produced at COT PRODUCTION 007528.

5 It's a string of e-mails.

6 A. Uh-huh.

7 Q. The last page is a picture of you.

8 A. That's me.

9 Q. The -- the earliest written portion of this is  
10 actually on the second page --

11 A. Okay.

12 Q. -- at the bottom about a little more --  
13 three-quarters of the way down where it reads, on  
14 Thursday, December 7, 2017, at eleven-thirty-two a.m.  
15 Do you see that?

16 A. Yes, I do.

17 Q. It says Mark Puskarich -- am I saying that  
18 correctly?

19 A. Yes, Puskarich.

20 Q. Mark Puskarich wrote, Hi Carrie, I hope you're  
21 doing well. I have some great news. Equality Florida  
22 would like to recognize Guido with our Voice for  
23 Equality Award at our Tampa Gala on February 24th at  
24 Tpepin's Hospitality Centre.

25 Did I read that correctly?

1 A. Yes, you did.

2 Q. What is this referring to?

3 A. Equality Florida has an annual gala. And they --  
4 they recognize certain individuals, not always  
5 political, just members of the community in general that  
6 have been advocates for pro LGBTQ policies or supportive  
7 in the community and whatnot.

8 Q. Now, the next -- third sentence in that paragraph  
9 says, because of Guido's work in helping to pass the ban  
10 on conversion therapy on minors in Tampa this year,  
11 which was just incredible, and his support of Equality  
12 Florida, we find him most deserving of this recognition.

13 Do you know what "his support of Equality  
14 Florida" is in view by Mr. Puskarich here?

15 A. When he says, "his support of Equality Florida,"  
16 he's referring to me; and, "me," being the individual  
17 that originally proposed this. So they're giving, you  
18 know, me credit for it and, of course, the award.

19 Q. At this point in time, had you ever given any  
20 kind of financial contribution to Equality Florida?

21 A. No.

22 Q. Had you ever done any other work or advocacy on  
23 their behalf?

24 A. No.

25 Q. The next -- or the following communication

1 directly above that one, it says, from Mark Puskarich,  
2 Friday, December 8, 2017, to Carrie Henriquez, says, Hi  
3 Carrie, just an update on this. The title of the award  
4 is Ally for Equality Award, and it recognizes a  
5 non-LGBTQ person that moves us closer to full equality.  
6 Sorry about that.

7 Did I read that correctly?

8 A. Yes.

9 Q. Now, between this first e-mail on December 7th  
10 and the follow-up on December 8th, had Carrie told you  
11 about what Equality Florida wanted to do as far as  
12 recognizing you?

13 A. After the original December 7th e-mail, yes. And  
14 I didn't know what the award was, so I googled Voice for  
15 Equality Award. And I think it's a different award  
16 because it's, like, mayors and bigger-named people get  
17 it. So, at first, I thought, wow, this is -- that's  
18 exciting. And then he -- where it says Mark above, he  
19 clarified that it's the Ally for Equality Award.

20 Q. Okay. So, based on this correction, did you  
21 believe that they had picked the more appropriate award  
22 for you?

23 A. Yeah, because I'm not a -- I'm not gay; and I  
24 think they go with, you know, an ally like the -- the  
25 mayor of St. Petersburg I think got one of these. And

1 he's considered an ally. So, when you say, LGBTQA, A is  
2 the ally.

3 Q. All right. And moving up to the next  
4 communication above this one, it says, on Friday,  
5 December 8, 2017, at nine-fifty-seven a.m.,  
6 Carrie Henriquez wrote. Do you see that?

7 A. Yes, where she says, thanks so much?

8 Q. Right.

9 A. Okay.

10 Q. Thank you so much. Councilman Maniscalco is  
11 absolutely thrilled at this prestigious honor.

12 Was that an accurate statement?

13 A. Yes, I was thrilled.

14 Q. Okay. So, at this point, you knew about the  
15 award; and you had agreed to accept it?

16 A. Yes.

17 Q. Did you ultimately receive this award as they --

18 A. Yes, I did at their gala. I don't remember the  
19 date. May have been February of this year. It was  
20 early this year. I don't remember the exact date.

21 Q. Was that the social event or social occasion  
22 where you spoke to Mr. Puskarich?

23 A. Yes. It was that -- it was their gala where he  
24 congratulated me and said thank you. I mean, there was  
25 a lot of people there. But that's where I saw him.

1 Q. Now, when you -- at any point in time from your  
2 proposal -- strike that.

3 Prior to your proposal of the ordinance, had you  
4 had any discussions with Equality Florida about, you  
5 know, helping them to either achieve the ordinance or  
6 had they --

7 A. No.

8 Q. -- indicated to you any offer or promise of an  
9 award --

10 A. No --

11 Q. -- if you got the ordinance passed?

12 A. -- I never had communication like that, no.

13 Q. So this was completely unexpected?

14 A. That is correct.

15 MR. WILLIAMS: "This," being the award?

16 MR. GANNAM: The award.

17 BY MR. GANNAM:

18 Q. Now, based on our review of those communications  
19 with your legislative aide, Ms. Henriquez, and your  
20 testimony that you had no knowledge of these  
21 communications as they were happening, would it be fair  
22 to say that -- that Equality Florida did not have any --  
23 any formal or official input into the passage of this  
24 ordinance?

25 A. Other than organizing people to come and speak --

1 mind you, the newspaper article had come out; and I know  
2 it was shared on social media. I mean, that's as far as  
3 they went is, you know, getting people to come and share  
4 their stories during the public hearing.

5 Q. Would it be also fair to say that the City of  
6 Tampa had no formal agreement or arrangement with  
7 Equality Florida for Equality Florida to provide support  
8 for the ordinance?

9 A. No. I mean, it's on a volunteer basis. People  
10 take time out of their day from work and come and speak  
11 for their three minutes, and that was it.

12 Q. Just to clarify it. The way I asked the question  
13 probably wasn't the best. Am I correct that the City of  
14 Tampa and Equality Florida had no agreement to -- for  
15 Equality Florida to provide support or help to get this  
16 ordinance passed?

17 A. That is correct.

18 Q. And is it also correct that the City of Tampa and  
19 Equality Florida have no agreement between them  
20 regarding a -- let me strike that.

21 I think I'm satisfied with my last question.

22 I want to go back to --

23 MR. WILLIAMS: Roger, before you go any  
24 further, are you guys planning on breaking for lunch  
25 or --

1 MR. MIHET: Yes.

2 MR. GANNAM: Yeah, we'll take lunch.

3 (Off-the-record discussion)

4 BY MR. GANNAM:

5 Q. I just wanted to finish this train of thought.  
6 Will you look back at Exhibit 10.

7 A. There we go.

8 Q. This is the e-mail COT PRODUCTION 004037. We  
9 talked about this e-mail. It appears to be the first  
10 communication from Ms. Henriquez to Equality Florida.  
11 Do you recall talking about it?

12 A. We discussed it a little bit ago today, yes.

13 Q. Now, the second paragraph, last sentence, says,  
14 two of the men who spoke claim that conversation therapy  
15 helped them transition from gay to straight. Did I read  
16 that correctly?

17 A. Yes, you did.

18 Q. Do you know what -- when or what event those two  
19 men spoke at?

20 A. This was at a public hearing. I remember one  
21 gentleman -- I don't remember his name. But he said  
22 that he was, you know, gay for so many years; and now  
23 he's happily married.

24 Q. To a woman?

25 A. To a woman, yes.

1 Q. So is it an accurate statement that there were at  
2 least two men who claimed that conversion therapy helped  
3 them during the public comment portion of the  
4 consideration of the ordinance?

5 A. I remember one. There may have been two. But I  
6 specifically remember what that gentleman said, what I  
7 had just said prior.

8 Q. So you don't know -- you remember one. But you  
9 don't disagree with Carrie that there could have been  
10 two?

11 A. I wouldn't disagree with the statement, no. And  
12 it's -- the meetings were all public record, and you can  
13 pull up the transcript to see.

14 Q. Sure. Okay.

15 So would it be fair to say that, among the  
16 evidence or facts considered by the City Council in  
17 connection with the passage of this ordinance, it would  
18 include at least the man you remember speaking favorably  
19 of conversion therapy and stating that it helped him?  
20 Would that be a fair statement?

21 A. Yes, sir.

22 Q. And if, in fact, there were others who said  
23 something similar, that would be on the public record?

24 A. Yes. Yes.

25 Q. All right. Let's take a break now.

1 (Recess)

2 BY MR. GANNAM:

3 Q. All right. I'm handing you what's marked as  
4 Plaintiffs' Exhibit 4. Here's a clean copy. Do you  
5 recognize this as the ordinance --

6 A. Yes.

7 Q. -- at issue? This is the copy filed by the City  
8 and a request for the Court to take judicial notice at  
9 document 24-1. And also, for the record, this is just  
10 pages one through eight of that filing consisting of the  
11 ordinance itself and the clerk's certificate on the  
12 front certifying that it is, in fact, the ordinance.

13 Do you recognize the ordinance?

14 A. Yes, I do.

15 Q. I want to ask you a couple of questions about it.  
16 Let's start on page four of the ordinance --

17 A. Okay.

18 Q. -- using the page numbers at the bottom.

19 A. Uh-huh.

20 Q. And somewhere around line -- let's see -- around  
21 line thirty-six.

22 A. Okay.

23 Q. Actually, let me -- yeah, line thirty-six.

24 It's a whereas clause or the recital I'll call  
25 it. And, it says, whereas, the City Council hereby

1 finds the overwhelming research. Do you see that?

2 A. Yes.

3 Q. Okay. I'll read the whole thing.

4 "Whereas, the City Council hereby finds the  
5 overwhelming research demonstrating that sexual  
6 orientation and gender identity change efforts can pose  
7 critical health risks to lesbian, gay, bisexual,  
8 transgender or questioning persons, and that being  
9 lesbian, gay, bisexual, transgender or questioning is  
10 not a mental disease, mental disorder, mental illness,  
11 deficiency, or shortcoming."

12 Did I read that correctly?

13 A. Yes, you did.

14 Q. The -- the overwhelming research identified in  
15 this recital, what does that refer to?

16 A. If you look through the ordinance and the other  
17 paragraphs, you'll see quite a few references in  
18 specific areas, you know, following a report or a  
19 statement or by different -- I mean, there's -- there's  
20 several pages of -- that are referenced here from the  
21 beginning.

22 Q. So, in the whereas or recital -- whereas clauses  
23 or recitals that precede that particular recital are  
24 listed several studies, papers, et cetera?

25 A. Yes.

1 Q. And that's what is identified -- or is meant by  
2 overwhelming research?

3 A. Yes, sir.

4 Q. Now, is it correct that the -- it's the City's  
5 position that it considered all of that research in  
6 connection with enacting this ordinance?

7 A. Yes, it did.

8 Q. Did you personally receive copies of all of the  
9 various studies and papers that are referenced in the  
10 ordinance?

11 A. When we receive the -- the initial information  
12 when we first made -- when I first made the motion for  
13 it, we had discussion there. And then the ordinance  
14 itself, once it was -- once we moved forward with this  
15 draft ordinance, it had all this. And, I mean, I can't  
16 speak for the other council members. But, you know, we  
17 tried to go into each one and, you know, come to our own  
18 conclusions.

19 Q. And, when you say, "each one," you're referring  
20 to each study --

21 A. Each whereas clause here, yeah, that is  
22 referenced.

23 Q. And did each member of the council receive all of  
24 the -- or copies of all of the various studies and  
25 papers that are referenced here?

1           A. We all receive the same equal material. And you  
2 can see, on the bottom of each page, you have web  
3 addresses; so you can actually go into further detail  
4 and read each one. I don't know if the other council  
5 members read all of them. I did my research going one  
6 by one in understanding the ordinance.

7           Q. And so you, personally, did you get into each of  
8 the studies and papers and actually read them?

9           A. I don't know if I did all of them. I don't  
10 remember specifically. I did go through, I know,  
11 several -- several of them.

12          Q. Maybe I'll just -- or let me just ask you. Is it  
13 correct that, as an official matter, each member of the  
14 City Council received or had access to each of the  
15 studies and papers that are identified in this  
16 ordinance?

17          A. Yes. We all received the same information as  
18 seen here in the ordinance, specifically with the web  
19 addresses so we can continue to do our own homework.  
20 And we all get the same stuff.

21          Q. And do you know whether any of the other council  
22 members read one or more or all of the --

23          A. No.

24          Q. -- various papers?

25          A. No. You would have to ask them personally. But,

1 no, I don't know.

2 Q. And there's no -- there wouldn't be a log or a  
3 record of which thing each person read?

4 A. No.

5 Q. Okay. So you personally -- let me just go to  
6 page one of the ordinance.

7 A. Okay.

8 Q. The first actual paper or study referenced is in  
9 the second recital. It begins, whereas, the American  
10 Academy of Pediatrics in 1993. Is that correct?

11 A. Yes, sir.

12 Q. And then, going forward to page four, the top of  
13 page four, the recital at the beginning of that page  
14 reads, The Agency for Healthcare Research and Quality  
15 issued a clinician's guideline for practitioners. Do  
16 you see that?

17 A. Yes, I do.

18 Q. Now, is that the end of the range of recitals  
19 mentioning studies and papers that were relied on for  
20 the ordinance?

21 A. That's the -- yeah, at the bottom of this page is  
22 where you see the final web address.

23 Q. At footnote fourteen?

24 A. It's -- yeah, footnote fourteen, line forty-nine.

25 Q. Okay. Now, looking at those -- that range of

1 various studies and papers from page one through four,  
2 do you -- do you recall specifically looking at any of  
3 them?

4 A. I mean, it's a lot of information. I don't  
5 remember any, you know, specific link or specific  
6 wording in the articles. My conclusion was that there  
7 was an agreement through all the sources that this is  
8 harmful or that there is no evidence saying that  
9 homosexuality can be prevented or anything else along  
10 those lines. I mean, they're all in agreement. If you  
11 go through it -- I mean, when I did my research based on  
12 what -- what is shown here, it's -- you know, they're  
13 all on the same -- on the same page.

14 Q. So would it be accurate to say that all these  
15 studies and papers, when you put them together, that's a  
16 couple hundred pages of stuff --

17 A. Yeah.

18 Q. -- in total?

19 A. Yeah.

20 Q. Okay. And you already told me that you looked at  
21 at least some of it?

22 A. Yes.

23 Q. You don't know what other council members --

24 A. No, I don't.

25 Q. -- have read? Okay.

1           And so the -- going back to the recital on page  
2     four referring to overwhelming research, that's  
3     referring to these various studies and papers identified  
4     in the ordinance and nothing else; is that correct?

5           A. That is correct.

6           Q. I want to be careful of the Court's order as far  
7     as timing goes. But, since the passage of the  
8     ordinance, are you aware of any new research or  
9     subsequently identified research or study that disagrees  
10    with any of the studies and papers that are identified  
11    in this ordinance?

12          A. No, I do not.

13          Q. If there had been some new study brought to your  
14    attention that disagreed with the studies and papers  
15    that are cited in the ordinance, as the -- the sponsor  
16    of the ordinance, would you feel some responsibility to  
17    bring that to the public's attention or reconsider  
18    anything that was enacted in the ordinance?

19          A. I had not considered it. The most recent, you  
20    know, piece of public information that I saw was in this  
21    governor's race in the primary. I know candidate for  
22    governor, Gwen Graham, said that she would want to  
23    propose a statewide ban. And I believe, in the last  
24    house session in Tallahassee earlier this year, at least  
25    one representative sponsored a bill to do a statewide

1 ban. I don't know where that went. I didn't follow --  
2 you know, I didn't look into that. But, I mean, that's  
3 the newest -- you know, anything -- newest news source  
4 or news story that I saw about this.

5 Q. In the course of the -- from that period of time  
6 when you proposed the ordinance to when it was enacted,  
7 did anyone present to the council members an  
8 explanation, a summary or other kind of, you know,  
9 exposition of all the information in these various  
10 studies and papers? Or was it just up to each council  
11 member to read whatever they felt like --

12 A. Yeah, just like in anything, a rezoning case or  
13 an ordinance reading or anything -- you know, something  
14 like this, enacting something new, it's up to us to do  
15 our own research. I take my time and taking it on a  
16 case-by-case basis. And then we wait for the public  
17 hearing; and, you know, we go from there allowing, you  
18 know, public input. But I can't speak for the other  
19 council members. There's some that, you know, are never  
20 at City Hall. I'm always there. You know, I treat this  
21 as a full-time job, and -- and that's really it.

22 Q. You've already answered for yourself, but are you  
23 aware of any of your fellow council members who have any  
24 background or training in mental health counseling?

25 A. I do not believe so, no.

1 Q. Do you know whether anyone on staff with the City  
2 involved in the initial staff report when this ordinance  
3 was initiated has that kind of training in mental health  
4 counseling or mental health experience?

5 A. I don't think so, no.

6 Q. Do you know whether any person with that kind of  
7 training or background gave input on behalf of the City  
8 into the drafting or enacting of this ordinance?

9 A. No.

10 MR. GANNAM: You know what? Now is probably  
11 the best time to break.

12 (Recess)

13 (Mr. Simpson is absent)

14 MR. GANNAM: We're back on.

15 BY MR. GANNAM:

16 Q. Before the lunch break, we were talking about the  
17 research that's cited in the ordinance. I want to talk  
18 about some of that specifically. We'll go to page one  
19 of the ordinance. The -- from my count, the longest of  
20 the recital paragraphs is the one at the bottom that  
21 refers to the American Psychological Association's Task  
22 Force on Appropriate Therapeutic Responses to Sexual  
23 Orientation. Do you see that?

24 A. Yes, I do.

25 Q. And this refers to a 2009 report by the APA Task

1 Force that I'll just refer to as the APA report. Will  
2 you know what I'm talking about if I say --

3 A. Yes.

4 Q. -- that?

5 A. Yes.

6 Q. Now, this report seems to be -- out of all the  
7 materials that are cited in here, probably the longest  
8 and most robust of the various papers. Would you agree  
9 with that?

10 A. I would -- I mean, not just because it's the  
11 longest paragraph; but I think it's the most in depth.

12 Q. Okay. Yeah. And so let's talk about some of the  
13 things in that report that bear on our ordinance here.  
14 I'm going to give you a copy of it. It's a paper copy.  
15 I'm going to mark it as Exhibit 17.

16 (Plaintiffs' Exhibit No. 17 marked for identification)

17 BY MR. GANNAM:

18 Q. I hunted for a stapler that could handle this  
19 whole thing, and I didn't find it. So we'll have to  
20 make due the best we can with a clipped copy. So I just  
21 handed you the APA report that's cited in this whereas  
22 clause. Do you recognize this report? Have you seen it  
23 before?

24 A. Yes. I have seen it in electronic format and  
25 PDF.

1 Q. Okay. And did you have an opportunity to look at  
2 all or some of that report in connection with the  
3 ordinance?

4 A. Some of it. I know I did not -- I did not read  
5 through all of this.

6 Q. Okay. Earlier today we talked about the  
7 difference between aversive and non-aversive therapies.  
8 Do you recall that?

9 A. Yes, I do.

10 Q. Just to generally summarize, the aversive  
11 therapies were -- they involve some element of  
12 punishment or reprimand --

13 A. Uh-huh.

14 Q. -- some kind of conduct like snapping a rubber  
15 band or inducing vomiting, things like that. Do you  
16 recall that?

17 A. Yes, I do.

18 Q. I want to talk about another distinction between  
19 treatments, the difference between coercive and  
20 involuntary treatments on the one hand versus voluntary  
21 treatment. Before I go further, do those terms mean  
22 anything to you; or is that something you've had an  
23 opportunity to look at?

24 A. I understand the meaning of the words.

25 Q. Of coercive and involuntary --

1 A. Yes.

2 Q. -- generally speaking? Okay. Very good.

3 I'm going to ask you to look at page seventy-one  
4 of that report down in footnote fifty-nine. It would be  
5 at the bottom of the page when you get there.

6 A. Which --

7 Q. The small footnote print. Yeah, you're in the --

8 A. We define?

9 Q. -- right spot. Yeah.

10 So fifty-nine says, we define coercive  
11 treatments. Do you see that?

12 A. Yes, I do.

13 Q. Says, "We define coercive treatments as practices  
14 that compel or manipulate a child or adolescent to  
15 submit to treatment through the use of threats,  
16 intimidation, trickery, or some other form of pressure  
17 or force."

18 Is that generally consistent with what your  
19 understanding of a coercive treatment --

20 A. Yes.

21 Q. -- would be?

22 A. Yes, it is.

23 Q. Okay. Also look at note sixty just over on the  
24 page, says, "We define involuntary treatment is that  
25 which is performed without the individual's consent or

1 assent and which may be contrary to his or her expressed  
2 wishes."

3 Does that definition generally comport with what  
4 you would think of as involuntary treatment?

5 A. I would agree with that, yes.

6 Q. And it goes on to say, "Unlike coercive  
7 treatment, no threats or intimidation are involved."

8 So coercive involves some kind of threat or  
9 intimidation. Involuntary simply means it's against the  
10 child's will. Is that fair?

11 A. Yes.

12 Q. So, given that we have these sort of different  
13 kinds of treatments that are covered -- we have aversive  
14 versus non-aversive, coercive and involuntary treatments  
15 versus voluntary -- I want to talk about what the City  
16 considered in connection with passing this ordinance  
17 based on those categories.

18 And so let me ask this. Did it -- did the City  
19 consider or discuss passing a ban against only aversive  
20 therapies while leaving non-aversive therapies allowed?

21 A. No. We just went with what -- we requested the  
22 information how other municipalities had banned it and  
23 moved forward with a -- I think it's a comprehensive ban  
24 on conversion therapy, in general.

25 Q. Okay. So is the reason the City didn't consider

1 banning something less than everything based on just  
2 what other cities had done?

3 A. I would agree with what the City brought to us  
4 because, I mean, in my understanding of conversion  
5 therapy and me being against it, me proposing it is --  
6 you know, for example, you brought up involuntary  
7 treatment without threats or intimidation. I mean,  
8 there are children out there, even adults, you know, all  
9 they have to do is see their father's face; and, you  
10 know, they completely change. You know? Nothing has to  
11 be said. And, you know, you wouldn't call it a threat.  
12 But there's an understanding and a respect which is a  
13 fear where you don't have to say anything; and just that  
14 person's presence or the fact of, you know, what will my  
15 father and my mother think is enough to intimidate a  
16 person. So, when you say involuntary treatment without  
17 threats or intimidation, you don't have to have threats  
18 or intimidation to send a message across.

19 Q. But did the City consider that a -- a voluntary  
20 treatment where the -- the child or adolescent wants to  
21 be there and desires the treatment would be less harmful  
22 than an involuntary or coercive treatment?

23 A. The City did not consider it. You know, I look  
24 at it as it's -- it's a harmful practice regardless.  
25 You know? I mean, if -- for example, the legal drinking

1 age is twenty-one but I feel that, at seventeen, I can  
2 handle the alcohol doesn't mean anything. I mean, it  
3 could be harmful or the law says that it's twenty-one;  
4 so I don't do it anyway.

5 Q. So is it the City's position that there's no  
6 difference in harm between a -- on the one hand, a  
7 voluntary treatment to change sexual orientation or  
8 gender identity, on the one hand, and an involuntary  
9 treatment to change those things on the other hand?

10 A. Treatment is equally harmful. It's not about if  
11 it's forced or it's -- somebody chooses to do it. It's  
12 -- it's -- in the end, the conclusion is the same. It's  
13 still equally harmful.

14 Q. So I'll ask the same question then just to make  
15 sure we've covered all the possibilities. Am I correct  
16 that the City did not consider banning only aversive  
17 treatments versus non-aversive treatments?

18 A. No. We were specific in asking for a conversion  
19 therapy ban. We looked at other cities; and it was  
20 comprehensive where it covered the therapy in general,  
21 not one or the other. It was just a comprehensive ban  
22 that covered everything.

23 Q. So I am correct that the City did not consider  
24 banning only aversive treatments versus non-aversive  
25 treatments?

1 A. We specifically asked for a comprehensive ban.

2 Q. From the very beginning?

3 A. From the beginning, it was a ban on conversion  
4 therapy, in general.

5 Q. And so -- and I'm sorry if I am beating a horse.  
6 I just want to make sure the record is clear. The City  
7 did not consider at any point banning only aversive  
8 treatments?

9 A. We didn't -- we didn't ask that. We specifically  
10 asked for a ban on everything.

11 Q. And I understand you've said that.

12 A. Yeah.

13 Q. But, given that this ordinance was considered,  
14 debated to some extent, commented on over a period of  
15 weeks between four different meetings, at any point did  
16 the City consider only banning aversive treatments?

17 A. No.

18 Q. At any point, did the City consider banning only  
19 coercive treatment while leaving voluntary treatment  
20 allowed?

21 A. No.

22 Q. At any point, did the City consider banning only  
23 involuntary treatments as opposed to voluntary  
24 treatments?

25 A. No. It was a general ban covering everything.

1 Q. From the beginning when you first proposed  
2 looking into the ordinance to the time of enactment, it  
3 was always a comprehensive ban of everything that was  
4 considered?

5 A. Yes. And that would reflect in the unanimous  
6 votes all the way through. So I think there was a  
7 general understanding by all council members that we  
8 want a complete ban. We never debated anything else  
9 because we specifically wanted the complete ban.

10 Q. Now, the -- can you look at page two of that  
11 report.

12 A. Okay.

13 Q. This is in the Executive Summary section. The  
14 footnote that is designated by the two asterisks at the  
15 lower right, do you see that?

16 A. I see it.

17 Q. It says in this report, we use the term sexual  
18 orientation change efforts, S-O-C-E, or SOCE, to  
19 describe methods, for example, behavioral techniques,  
20 psychoanalytic techniques, medical approaches, religious  
21 and spiritual approaches that aim to change a person's  
22 same-sex sexual orientation to other sex regardless of  
23 whether mental health professionals or lay individuals,  
24 including religious professionals, religious leaders,  
25 social groups and other lay networks such as self-help

1 groups are involved.

2 Did I read that accurately?

3 A. Yes, you did.

4 Q. Is it your understanding then, from this  
5 footnote, that this entire APA report doesn't  
6 differentiate between SOCE performed by licensed  
7 professionals on the one hand and SOCE performed by  
8 people who aren't licensed and may just be part of a  
9 religious organization?

10 A. In our ordinance and in the ban, it does exempt  
11 churches and clergy and whatnot. So I don't think they  
12 -- I mean, they're exempt from this.

13 Q. And so you're probably thinking of my question.  
14 You said a moment ago that, in the City's view, the  
15 treatment itself is what is harmful. Whether it's  
16 voluntary or involuntary, it's the treatment itself that  
17 causes harm, correct?

18 A. Yes.

19 Q. And so did the City consider banning all sexual  
20 orientation change efforts regardless of whether it was  
21 performed by a licensed professional or performed by an  
22 unlicensed religious person given that the treatment  
23 itself is harmful?

24 A. We separated -- we exempted churches and other  
25 religious organizations. However, it's written in the

1 ordinance assuming, you know, freedom of speech, First  
2 Amendment, freedom of Religion. So we left it at that.

3 Q. So is it the City's position that, if a practice  
4 is harmful to children, that the City could not ban it  
5 if that harmful practice was carried out by a member of  
6 a church or a leader of a church?

7 A. Well, I mean, you could look at it as Roe versus  
8 Wade. The federal government says that abortion is  
9 legal. The Catholic church is on the opposite end of  
10 that and says that, you know, in their view, abortion is  
11 murder; or they are opposed to it. So they have the  
12 freedom to express that. But, through licensed  
13 professionals, which is doctors who would perform that  
14 abortion, a person can legally have it. Whatever the  
15 church's opinion is is beyond our purview.

16 Q. I'm going to guess -- and you can correct me if  
17 I'm wrong -- that you're at least generally aware of  
18 recent news reports of very large prosecutions of  
19 Catholic clergy in the Northeast related to childhood  
20 sexual abuse carried --

21 A. Uh-huh.

22 Q. -- out over a number of years? Are you generally  
23 aware of stories like that?

24 A. Yeah, recently in the news.

25 Q. When you look at a story like that, I think most

1 people would agree that, if sexual abuse is carried out  
2 against a child, if it's carried out by a clergy or a  
3 church leader, they should still be prosecuted just like  
4 if it was carried out by anyone else. Would you agree  
5 with that statement?

6 A. Those are criminal offenses, and that's something  
7 completely different. This would be -- per the  
8 conversion therapy is, you know, a church or whatever  
9 religious organization can say it's counseling on their  
10 part. But, as a City Council, you know, with the  
11 ordinance that we pass within the City of Tampa limits,  
12 within, you know, our jurisdiction, you know, we passed  
13 this ban exempting, you know, those churches. So that's  
14 a completely different jurisdiction.

15 Q. But the City has taken the position by enacting  
16 this ordinance that, if an unlicensed member of the  
17 clergy performs conversion therapy on a minor, that that  
18 is okay with the City? But, if a licensed professional  
19 does the exact same thing, that's not okay with the  
20 City?

21 A. We see it as harmful either way. You know, we  
22 can, you know, create the laws by ordinance and have the  
23 mayor sign them and implement them. So whatever  
24 jurisdiction we have with the City of Tampa is what we  
25 do. What the church does is beyond our control. Should

1 it lead to, as you're talking about recent news stories,  
2 that's a separate criminal thing that the City doesn't  
3 get involved in beyond, you know, a police officer  
4 making an arrest or whatever gets involved at that  
5 point.

6 Q. Given that the City looks at the practice itself  
7 of conversion therapy as harmful regardless of who's  
8 doing it, could the City have included church leaders or  
9 clergy or any adult, for that matter, within its ban on  
10 conversion therapy?

11 A. We based it on how other municipalities did it.  
12 Others have exempted it, so we went with what was the  
13 best practice moving forward.

14 Q. I want to now ask you to look at page nine of the  
15 report. Now, in the left column -- I'm going to say  
16 it's the -- the second complete paragraph that begins  
17 with we also concluded. Do you see that?

18 A. Yes.

19 Q. Skipping down to the last sentence of that  
20 paragraph. I'll read it. "Due to our charge, we  
21 limited our review to sexual orientation and did not  
22 address gender identity, because the final report of  
23 another task force, the APA Task Force on Gender  
24 Identity and Gender Variance, was forthcoming." See APA  
25 2009.

1 Did I read that correctly?

2 A. Yes, you did.

3 Q. So can't we conclude from that statement is that  
4 this whole 2009 APA report deals only with sexual  
5 orientation change efforts and not at all with gender  
6 identity change efforts?

7 A. Yes. As it's stated here, there's two different  
8 reports.

9 Q. Now, did the City include in its recitals and in  
10 its ordinance this separately identified APA Task Force  
11 on Gender Identity and Gender Variance report?

12 A. I'm not sure.

13 Q. Okay. Can I ask you for -- to move forward to  
14 page forty-two of the report.

15 A. Okay.

16 Q. This is the case where the paper is faster than  
17 the computer, so let me just catch up with you.

18 The bottom of -- bottom left of forty-two,  
19 there's a heading, Recent Studies. Do you see that?

20 A. Yes.

21 Q. Now, the first sentence reads, "Although the  
22 recent studies do not provide valid causal evidence of  
23 the efficacy of SOCE or of its harm, some recent studies  
24 document that there are people who perceive that they  
25 have been harmed through SOCE" -- and then there are

1 several citations -- "just as other recent studies  
2 document that there are people who perceive that they  
3 have benefited from it."

4 Did I read that correctly?

5 A. Yes, you did.

6 Q. Let me ask you to also look under the heading  
7 Summary on the right column. It begins, "we conclude  
8 that there is a dearth of scientifically sound research  
9 on the safety of SOCE."

10 Did I read that correctly?

11 A. Yes, you did.

12 Q. And then moving down about a little more than  
13 halfway down that paragraph, it begins, "thus, we  
14 cannot." Do you see that?

15 A. Yes.

16 Q. It reads, "Thus, we cannot conclude how likely it  
17 is that harm will occur from SOCE."

18 Based on this information or these statements, do  
19 you agree that the APA has taken the position that the  
20 studies don't provide any causal evidence of either the  
21 efficacy of SOCE or of its harm?

22 A. I would disagree with that because, under recent  
23 studies, what we read, there are people who perceive  
24 that they have been harmed through SOCE. And, since  
25 it's taken on a case-by-case, person-by-person basis, I

1 mean, I think it would be wrong to conclude that -- when  
2 they say here, thus, we cannot conclude how likely it is  
3 that harm will occur, you have cases where people are  
4 saying that they were harmed through SOCE.

5 Q. So is the City in disagreement with these  
6 statements of the APA, for example, that there's no --  
7 the studies don't provide a causal connection? They  
8 don't provide causal evidence of the harm of SOCE? Does  
9 the City disagree with that?

10 A. I would disagree with that especially after we  
11 had our public meetings and so many people spoke about  
12 their own personal stories. You know, that was  
13 reflected on the record of how it affected them, you  
14 know, one by one. Every person is different. So you  
15 can't just make a generalization that, well, maybe yes,  
16 maybe no.

17 Q. And the statement further by the APA that, we  
18 cannot conclude how likely it is that harm will occur  
19 from SOCE, does the City disagree with that statement?

20 A. Once again, I would disagree with that because, I  
21 mean, it's -- it's case by case. You know,  
22 psychologists or a psychiatrist or a doctor, for that  
23 matter, has no guarantee that they can cure somebody of  
24 anything. I mean, you can go into remission for cancer  
25 and say you're cured; and it comes back with a

1 vengeance. You can put somebody on antidepressants and  
2 say after six months that they're fine, and then they  
3 commit suicide as -- you know, as I've witnessed in my  
4 life. So...

5 Q. But I think my question was: Does the City  
6 disagree with the statement that the likelihood of harm  
7 from SOCE cannot be determined?

8 A. I would -- well, I would agree with that because,  
9 once again, it's case by case. You don't know -- you  
10 could have a hundred people, and it could be  
11 fifty-fifty. It could be eighty-twenty. You don't  
12 know.

13 Q. Let me ask you this. Does the City have a  
14 position about how likely it is that loneliness, for  
15 example, will result from SOCE counseling or conversion  
16 therapy?

17 A. Once again, you know, it would have no position  
18 because everybody is different. Everybody's going to  
19 react differently.

20 Q. So would it be true that the City of Tampa cannot  
21 say whether the likelihood of a negative outcome for a  
22 minor who receives SOCE is fifty percent or one percent  
23 or zero percent?

24 A. I can't come to a number because humans have  
25 freewill; and people -- you know, you don't know how

1 someone's going to react or behave or change or what  
2 incidences in their lives will trigger whatever. So...

3 Q. The answer is, no, the City can't tell what the  
4 likelihood is?

5 A. Nobody can.

6 Q. And would the answer be the same for the  
7 likelihood that feelings of rejection or depression will  
8 result from SOCE counseling?

9 A. I believe it's possible, especially after hearing  
10 the comments made from the public when we had the public  
11 hearings.

12 Q. So you believe it's possible. But my question is  
13 a little different.

14 My question is: Can the City say how likely it  
15 is that feelings of rejection or depression will result  
16 from SOCE counseling on a minor?

17 A. The only time is to talk to people that have been  
18 through it and see from there. But you can never get a  
19 definitive number.

20 Q. Okay. And the same question then: Can the City  
21 say how likely it is that a minor will experience  
22 suicidal thoughts as a result of receiving SOCE  
23 counseling?

24 A. We can only use, you know, evidence of what's  
25 happened in the past of people that have committed

1 suicide or have contemplated suicide. Once again, the  
2 people that spoke before council, you know, the -- some  
3 of the e-mails that you showed me earlier saying how  
4 it's barbaric how -- you know, how hurtful it is, how  
5 harmful it is. I mean, that's coming from the general  
6 public. You know, people have different opinions.

7 Q. And I do want to ask you just to specifically  
8 answer the question I asked, which is: Does the City  
9 know how likely it is that suicidal thoughts will occur  
10 as a result of SOCE?

11 A. No, nobody knows.

12 Q. I want to ask you to look at page forty-three,  
13 please. At the end of that -- there's two paragraphs  
14 there. At the end of the first one, the last sentence  
15 begins, "we found." Do you see that?

16 A. Yes.

17 Q. Says, "We found that nonaversive and recent  
18 approaches to SOCE have not been rigorously evaluated.  
19 Given the limited amount of methodologically sound  
20 research, we cannot draw a conclusion regarding whether  
21 recent forms of SOCE are or are not effective."

22 Did I read that correctly?

23 A. You read it correctly. But, continuing into the  
24 next sentence, we found that there was some evidence --  
25 there was some evidence to indicate that individuals

1 experienced harm from SOCE. So...

2 Q. Understood. I want to ask you about the sentence  
3 that I read. It says that they found that non-aversive  
4 and recent approaches to SOCE have not been rigorously  
5 evaluated. Did I read that part correctly?

6 A. Yes, you did.

7 Q. And then they go on to say, "We cannot draw a  
8 conclusion regarding whether recent forms of SOCE are or  
9 are not effective."

10 Did I read that correctly?

11 A. You did.

12 Q. So, based on that statement, did the City take  
13 that into account when you told me that only a  
14 comprehensive ban on all kinds of SOCE was ever  
15 considered?

16 A. What year was this -- this published? Was it  
17 1997?

18 Q. 2009.

19 A. 2009.

20 So we have almost a decade that has passed --  
21 well, at the time that this was proposed, eight years  
22 where there's even more information. I mean, this is  
23 just one report. You look at the ordinance, there's  
24 quite a few reference points. So, if you would look at  
25 ten years ago, the word transgender wasn't used; or,

1 gender identity, the term wasn't as common as it is  
2 today. And, since then, the world has changed. And I  
3 would say, just because one report says this, we have so  
4 much supporting documentation in the ordinance itself  
5 that's newer that would say otherwise. So this is just,  
6 you know, one sentence, one opinion. But we have to  
7 look forward -- I mean, look further than that because  
8 almost a decade has passed.

9 Q. Can you point me to any of the other studies or  
10 papers that are identified in the ordinance that  
11 disagree or updates the conclusions of this 2009 APA  
12 report?

13 A. No. I would have to go through them one by one.

14 Q. When you testified a moment or two ago that no  
15 one can give a definitive answer on how likely it is  
16 that harm will occur as a result of SOCE, you're talking  
17 about as we sit here today, correct?

18 A. Exactly.

19 Q. I want to look back now at the ordinance itself,  
20 which is Exhibit 4.

21 A. Which part of the ordinance did you want?

22 Q. That's a good question. Let me get there.

23 (Recess)

24 (Mr. Simpson enters the deposition room)

25 BY MR. GANNAM:

1 Q. I asked you to look at the ordinance. Will you  
2 turn to page four, around line twenty-nine to thirty, a  
3 recital that reads, "Whereas, City of Tampa has a  
4 compelling interest in protecting the physical and  
5 psychological wellbeing of minors."

6 Do you see that?

7 A. Yes, I do.

8 Q. What is the -- the compelling interest of the  
9 City of Tampa in passing an ordinance like this?

10 A. I think it goes under general public safety. Of  
11 course, you know, we talk about investing in our  
12 communities, in our neighborhoods, you know, the safety  
13 of our people, quality of life. I think it's a  
14 quality-of-life issue. You know, we've always been --  
15 beyond the conversion therapy ban, we have a domestic  
16 partner registry that the previous City Council  
17 approved. We've been recognized as very inclusive, LGBT  
18 friendly, you know, a welcoming city. I mean, so many  
19 things that I've been told over the years. People want  
20 to come here and start a family here or live comfortably  
21 here where they know that, you know, the government and  
22 the elected officials have their back and always -- you  
23 know, they look to -- to protect one another.

24 Q. Does the City -- is it the City's position that  
25 it has the same compelling interest in banning, for

1 example, aversive conversion therapy versus non-aversive  
2 conversion therapies?

3 A. I think, with the conversion therapy ban, it's  
4 just, in general, covering all aspects of it, both.

5 Q. I understand that's what it does.

6 My question is: Is it the City's position that  
7 its interest in banning one kind, for example, aversive  
8 therapy, is the same as its interest in banning  
9 non-aversive therapy?

10 A. Yes, I would agree with that.

11 Q. And, looking further in that same recital  
12 paragraph, we continue on, it -- the first compelling  
13 interest is in protecting physical and psychological  
14 wellbeing. It then goes on to say, and in protecting  
15 its minors against exposure to serious harms caused by  
16 sexual orientation and gender identity change efforts.

17 Did I read that correctly?

18 A. Yes, you did.

19 Q. My question is about this statement, "serious  
20 harms caused by sexual orientation and gender identity  
21 change efforts." Given that we just looked at the APA  
22 report, which is one of the more robust reports or more  
23 thorough reports recited in the ordinance, and seeing  
24 how it says that they, the APA Task Force, concluded  
25 they can't draw a causal link between harm and sexual

1 orientation change efforts, is the City relying on some  
2 other source of information for this statement that --  
3 about serious harms caused by sexual orientation and  
4 gender identity change efforts?

5 A. What you're referencing is one opinion. And  
6 there's multiple -- you know, throughout the ordinance,  
7 there's -- per paragraph, you have multiple agencies or  
8 licensed professionals or, you know, different  
9 organizations, World Psychiatric Association, American  
10 College of Physicians. I think the general conclusion  
11 is that it is harmful overall. I mean, one statement or  
12 one opinion from a study that was done ten years ago  
13 should also be looked at as, if they were to do it today  
14 in 2018 and updated it, would they come to the same  
15 conclusion considering how the conversation has changed  
16 in this country and in this world? And, as I mentioned  
17 earlier, now with gender identification and other topics  
18 that had not been thoroughly discussed before.

19 Q. Is it your understanding that the 2009 APA report  
20 was itself a study of lots of other studies?

21 A. Well, it was different -- different conclusions  
22 from different licensed individuals that -- that  
23 contributed to the report, therefore, coming to their  
24 conclusion of -- because it depends what you look at.  
25 They will say it is harmful, and then the sentence

1 before they say that they have not come to a conclusion  
2 either/or. But I think there's enough evidence in  
3 there, in what we looked at on, what was it, page  
4 forty-three, four-two where we were at previously, that  
5 agrees with the general -- you know, it's the general  
6 consensus of it that it is harmful and that they have  
7 individual cases that were referenced within that  
8 paragraph.

9 Q. So does this statement regarding serious harms  
10 caused by SOCE and gender identity change efforts rely  
11 on the APA report or one of the other sources that are  
12 recited in the ordinance?

13 A. I think it's general consensus from -- from  
14 everything as a whole.

15 Q. Including that APA report?

16 A. Yes.

17 Q. You've mentioned a couple of times that the APA  
18 report is from way back in 2009. In connection with the  
19 consideration or enactment of the ordinance, did the  
20 City ask anyone else or ask someone else to complete a  
21 study to update any of the studies cited in the  
22 ordinance?

23 A. No, because we had so much evidence in the  
24 ordinance and so many reference points that were newer  
25 than that. I mean, there was just a tremendous amount

1 of information that I would say, you know, came into  
2 agreement with -- with the fact that it is harmful. You  
3 see here, in 2014, American School Counselors  
4 Association; a 2015 report; 2016, American Medical  
5 Association; another 2016 report; 2012; 2012. It goes  
6 on and on that it's very convincing and clear that it is  
7 harmful, and people would agree with it. Maybe we go  
8 back to the beginning, and it's done in order. '93,  
9 '98, 2009, you know, beyond the report that you're  
10 discussing which is early on in the ordinance. That's  
11 one opinion. But, I mean, you have several pages where  
12 it's more recent, you know, as people have done more  
13 thorough research.

14 Q. Do any of the other studies or papers cited in  
15 the ordinance besides the 2009 APA report state that  
16 there is a causal connection that can be found between  
17 sexual orientation or gender identity change efforts and  
18 harm?

19 A. I would say yes.

20 Q. Can you identify which of those --

21 A. No. I would have to go through them one by one.

22 Q. As you sit here today, you can't point me to one  
23 of them that says that?

24 A. No. But they are referenced there by website, by  
25 PDF, by electronic document where it can be found. And

1 they -- I mean, by reading just the whereas clauses  
2 throughout the ordinance, they come to the same  
3 conclusion that it is harmful, that it is harmful.  
4 There's compelling interest here with the City of Tampa  
5 in protecting physical and psychological wellbeing of  
6 minors. And we'd say that because of all these previous  
7 studies before. I mean, I think it's -- it's more than  
8 clear.

9 Q. Is it your understanding that the -- strike that.  
10 Who is it that you understand actually drafted  
11 the actual language of this ordinance that the City  
12 Council voted on?

13 A. We requested from the legal department so someone  
14 in the legal department or persons in the legal  
15 department.

16 Q. Okay. Is it your understanding that the legal  
17 department drafted this ordinance from scratch, or did  
18 they rely on language from other ordinances that had  
19 been enacted?

20 A. We asked them to come back with the information,  
21 the staff report, and looking at other municipalities.  
22 So, in order to make their job easier where they can  
23 have a template and somewhere to start from, they looked  
24 at other places that have already banned this, see how  
25 they did it. And, in that, they brought back this

1 ordinance with the specifics here which came before us  
2 with the public hearing.

3 Q. Do you know how much of the content of Tampa's  
4 ordinance is original to Tampa and how much of it is  
5 taken or borrowed from other ordinances that have --

6 A. No, I do not. And it's not a question that we  
7 would ask.

8 Q. Okay. Focusing back on this paragraph on page  
9 four about the compelling interests, are there any  
10 compelling interests claimed by the City of Tampa in  
11 enacting this ordinance that are not listed in this  
12 recital?

13 A. Specifically in this paragraph?

14 Q. Right.

15 A. I think it covers everything. It covers what we  
16 asked them to cover.

17 Q. And by, "we," you mean, the City Council?

18 A. We as the City Council, yes, by way of the  
19 motion.

20 Q. So would it be fair to say that all of the  
21 compelling interests that the City of Tampa has in  
22 enacting this ordinance are covered in this paragraph?

23 A. Yes.

24 Q. In the course of the development of this  
25 ordinance and its ultimate enactment, did -- did the

1 council members -- did any of the City Council members  
2 meet individually with members of the legal department  
3 to discuss the content of the ordinance?

4 A. Do you mean after or during the discussions while  
5 we were voting on moving it forward?

6 Q. During that whole period of time from your first  
7 request for the staff report through the enactment. So,  
8 during that period of time, were there meetings by  
9 individual council members and members of the legal  
10 staff?

11 A. I had a meeting with one member of the legal  
12 department.

13 Q. And who was that meeting with?

14 A. His name is Ernie Mueller.

15 Q. And what is Ernie Mueller's position?

16 A. He's one of the attorneys in the -- for the City  
17 of Tampa.

18 Q. What was his role in drafting the ordinance?

19 A. I believe he did some of the research.

20 MR. WILLIAMS: Councilman Maniscalco, I  
21 would caution you to not allow the questioning to invade  
22 the attorney-client privilege.

23 THE WITNESS: Okay.

24 MR. WILLIAMS: So far so good. Describing  
25 what Mr. Mueller perhaps did is not within the ambit of

Vazzo v. City of Tampa  
Guido Maniscalco

10/31/2018

Page 123

1 that privilege. But communications between you and  
2 Mr. Mueller would be.

3 THE WITNESS: Yes.

4 BY MR. GANNAM:

5 Q. What was the subject matter -- you said one  
6 meeting, correct?

7 A. Yes, sir.

8 Q. What was the subject matter of your one meeting  
9 with Mr. Mueller?

10 A. It was different municipalities and how their --  
11 that had banned this and how they had it worded.

12 Q. Who requested the meeting?

13 A. I believe the -- the legal department, whoever  
14 the secretary was, called and set it up saying, you  
15 know, we want to follow up with you.

16 Q. Did Mr. Mueller have similar meetings to discuss  
17 the same subject matter with the other council members?

18 A. I don't know. It may have been just with me -- I  
19 don't know -- because I brought it up. But that would  
20 be a matter of public record because the calendars are  
21 available. But, as far as I know, I'm the only one that  
22 met with him; but I don't know.

23 Q. Is there a -- to your knowledge, a general  
24 practice of the legal department of meeting with -- with  
25 all council members individually if it meets with one so

1 that all council members have the same information?

2 A. Generally, yes, if it comes to a rezoning or --  
3 you know, a major change or an item coming before  
4 council for a vote. We would get briefings as  
5 individual council members. We can't talk to each  
6 other, but legal or whomever can just give us an update.

7 Q. And so the particular meeting that you had with  
8 Mr. Mueller, did it in any way involve discussion of  
9 possible court challenges to the ordinance?

10 A. No.

11 Q. And I just want to get clarification from your  
12 attorney.

13 MR. GANNAM: I'm going to ask him what they  
14 talked about. And, if you make the objection, I guess  
15 we'll deal with it. But do you know what the content of  
16 the meeting was, and that's why you're sort of  
17 preliminarily bringing up the privilege? Or...

18 MR. WILLIAMS: Well, Roger, I don't know  
19 that I am obligated to answer that question.  
20 Communications between a lawyer and a client, in this  
21 case the Assistant City Attorney for the City of Tampa,  
22 is within the ambit of that type of communication. So  
23 whatever I know or don't know is irrelevant.

24 I'm going to object to any question that  
25 would intrude on that attorney-client relationship. And

1 I'll do it question by question. And the way I'm going  
2 to do it is to advise Councilman Maniscalco that the  
3 question, in my opinion, intrudes on the attorney-client  
4 relationship; and, therefore, his answer would abrogate  
5 the attorney-client privilege. And he is not obligated  
6 to answer the question, in my opinion. And he can  
7 follow my advice or not follow my advice. But I think  
8 he will.

9 MR. GANNAM: So, in light of what your  
10 attorney has just said, I want to just -- just take it  
11 piece by piece.

12 BY MR. GANNAM:

13 Q. You said, generally, the subject matter of your  
14 meeting was what other municipalities had enacted; is  
15 that correct?

16 A. Yeah, just a basic overview. This is what we  
17 researched.

18 Q. And during what part of the process did this  
19 meeting occur? When I say, "the process," from your  
20 initial request to the enactment.

21 MR. WILLIAMS: The timeline, if you will.

22 THE WITNESS: I don't really remember. I  
23 would guess that it was when I made the initial motion  
24 to come back with a staff report. It may have been  
25 before that staff report or after. I don't remember.

Vazzo v. City of Tampa  
Guido Maniscalco

10/31/2018

Page 126

1 But it was before the final votes and before it went  
2 to -- before the first reading took place. I know that.

3 BY MR. GANNAM:

4 Q. Would it have also been before an actual draft of  
5 the ordinance was prepared?

6 A. It may have been.

7 Q. Did you at any -- did you discuss the contents of  
8 what should be in the ordinance that goes to the  
9 council?

10 A. No. He -- the attorney said this is what --

11 MR. WILLIAMS: Whoa, whoa, whoa. No. I  
12 don't want --

13 THE WITNESS: Okay.

14 MR. WILLIAMS: I'm advising you that  
15 anything that you said during that meeting to  
16 Mr. Mueller and vice versa is privileged. And I'm  
17 advising then that you are not required to disclose that  
18 communication because it is privileged.

19 THE WITNESS: Then I have nothing to  
20 disclose.

21 BY MR. GANNAM:

22 Q. I guess --

23 MR. GANNAM: Could you read back my question  
24 before the objection.

25 (Requested portion read back by the court reporter)

1 MR. GANNAM: I'm going to rephrase the  
2 question.

3 MR. WILLIAMS: And, Roger, before you do  
4 that, just to speed the process up. Since I've  
5 announced on the record the basis and the way that I do  
6 this, I'm just simply going to object, invades the  
7 attorney-client privilege. And can we agree that that  
8 statement on my part encompasses the short instructive  
9 speech that I made a little earlier, and that way I  
10 don't have to go through that speech every time? It  
11 will save us probably minutes, if not more than minutes.

12 MR. GANNAM: Okay.

13 MR. WILLIAMS: Is that okay?

14 MR. GANNAM: That's fine with me.

15 BY MR. GANNAM:

16 Q. So, without telling me specifically what was  
17 said, I want to ask you: Did the subject matter of your  
18 conversation include what content should be in the draft  
19 ordinance when it's prepared?

20 A. No.

21 Q. Okay. Did that conversation -- did the subject  
22 matter of that conversation include to what extent the  
23 City should or should not rely on the various studies  
24 and papers that are recited --

25 A. No.

1 Q. -- in the --

2 A. No.

3 Q. -- ordinance?

4 MR. GANNAM: Okay. All right. I'm ready to  
5 move on from that. I think we're done with  
6 Mr. Maniscalco. I just want to consult with my  
7 colleague for just a moment.

8 MR. WILLIAMS: Sure.

9 (Recess)

10 MR. GANNAM: All right. We have no further  
11 questions for you, Mr. Maniscalco. And we're ready to  
12 move on to the next designee.

13 (Proceedings concluded at 1:46 o'clock p.m.)

14

15

16

17

18

19

20

21

22

23

24

25

Vazzo v. City of Tampa  
Guido Maniscalco

10/31/2018

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

CERTIFICATE OF OATH

STATE OF FLORIDA)  
COUNTY OF PALM BEACH)

I, Rachele L. Cibula, the undersigned authority,  
certify that GUIDO MANISCALCO personally appeared before  
me and was duly sworn.

Witness my hand and official seal this 4th day of  
November, 2018.

*Rachele L. Cibula*  
RACHELE L. CIBULA  
Notary Public, State of Florida  
My Commission #FF 936928  
Expires: December 14, 2019



Vazzo v. City of Tampa  
Guido Maniscalco

10/31/2018

Page 130

1 C E R T I F I C A T E

2 THE STATE OF FLORIDA)  
3 COUNTY OF PALM BEACH)

4

5 I, Rachele Lynn Cibula, Notary Public, State of  
6 Florida at Large,

7 DO HEREBY CERTIFY that I was authorized to and did  
8 stenographically report the foregoing deposition; and  
9 that the transcript is a true and correct transcription  
10 of the testimony given by the witness.

11 I FURTHER CERTIFY that I am not a relative, employee,  
12 attorney or counsel connected with the action, nor am I  
13 financially interested in the action.

14 Dated this 4th day of November, 2018.

15

16

17

18

19

20

21

  
RACHELE LYNN CIBULA, NOTARY PUBLIC

22

23

24

25

<b>A</b>	90:22 106:22	66:12 82:19	<b>anyway</b> 100:4	<b>arrest</b> 106:4
<b>a.m</b> 78:14 81:5	<b>addressed</b> 50:7	<b>aim</b> 102:21	<b>APA</b> 37:11,23	<b>article</b> 3:8 26:25
<b>abbreviation</b> 8:9	55:16 62:13	<b>aimed</b> 54:23	94:25 95:1,21	27:4 49:9 60:2
<b>ability</b> 9:16 44:11	63:4	<b>alcohol</b> 28:16	103:5 106:23,24	69:10 83:1
47:1	<b>addresses</b> 89:3,19	100:2	107:4,10 108:19	<b>articles</b> 91:6
<b>able</b> 9:20	<b>adolescent</b> 97:14	<b>alcoholic</b> 21:16	109:6,17 114:11	<b>ASAP</b> 73:13 74:5
<b>abortion</b> 104:8,10	99:20	<b>alcoholism</b> 21:22	116:21,24	<b>ascribed</b> 59:7
104:14	<b>adult</b> 106:9	22:24 28:10	117:19 118:11	<b>asked</b> 7:17 22:3
<b>above-styled</b> 5:7	<b>adults</b> 99:8	<b>allow</b> 122:21	118:15,17	23:10 33:24
5:8	<b>advice</b> 125:7,7	<b>allowed</b> 98:20	119:15	41:4 47:4 68:21
<b>abrogate</b> 125:4	<b>advise</b> 59:6 125:2	101:20	<b>apart</b> 12:10 22:7	73:25 83:12
<b>absent</b> 94:13	<b>advising</b> 126:14	<b>allowing</b> 93:17	31:12 41:23	101:1,10 112:8
<b>absolutely</b> 81:11	126:17	<b>alluding</b> 10:19	44:5 45:3,11	115:1 120:20
<b>abuse</b> 28:9,25	<b>advocacy</b> 14:7,11	<b>ally</b> 80:4,19,24	<b>APPEARANCES</b>	121:16
29:20 30:6,15	14:16 18:20	81:1,2	2:1	<b>asking</b> 43:2 56:3
54:23 104:20	45:13 79:22	<b>amazing</b> 75:11,14	<b>appeared</b> 129:7	59:1 100:18
105:1	<b>advocates</b> 48:14	<b>Amber</b> 70:7 73:2	<b>appearing</b> 9:12,23	<b>aspects</b> 116:4
<b>abusive</b> 31:14	79:6	73:8	10:6,9 65:2	<b>assent</b> 98:1
<b>Academy</b> 90:10	<b>affect</b> 9:16	<b>ambit</b> 122:25	68:14	<b>assistant</b> 61:22
<b>accept</b> 22:2 30:10	<b>affiliated</b> 34:15	124:22	<b>appears</b> 53:5 54:8	124:21
33:14 81:15	<b>afraid</b> 28:14	<b>Amendment</b>	84:9	<b>Association</b> 4:16
<b>accepting</b> 31:10	<b>age</b> 100:1	104:2	<b>appoint</b> 17:4	37:16,18 117:9
<b>access</b> 47:15 63:5	<b>agencies</b> 117:7	<b>American</b> 4:15	<b>appointed</b> 17:1	119:4,5
74:15 76:11	<b>Agency</b> 16:16,25	37:16,17 90:9	<b>appointee</b> 17:5	<b>Association's</b>
89:14	90:14	94:21 117:9	<b>appointments</b>	94:21
<b>account</b> 63:11,18	<b>ago</b> 5:19 12:7	119:3,4	17:8	<b>assume</b> 7:3 38:22
113:13	28:24 64:6 71:1	<b>amount</b> 112:19	<b>appoints</b> 17:3	57:13 63:21
<b>accurate</b> 27:13,24	84:12 103:14	118:25	<b>appreciate</b> 52:20	65:23 69:2
81:12 85:1	113:25 114:14	<b>Annie</b> 3:20	<b>approaches</b>	<b>assuming</b> 104:1
91:14	117:12	<b>annie.greenspa...</b>	102:20,21	<b>asterisks</b> 102:14
<b>accurately</b> 103:2	<b>agree</b> 62:8 95:8	62:21	112:18 113:4	<b>attached</b> 73:12
<b>achieve</b> 82:5	98:5 99:3 105:1	<b>announced</b> 127:5	<b>appropriate</b> 4:16	<b>attend</b> 72:12
<b>acronym</b> 8:12	105:4 108:19	<b>annual</b> 79:3	80:21 94:22	73:14 74:5,12
<b>act</b> 57:6 62:3	110:8 116:10	<b>answer</b> 6:5 7:2,9	<b>approval</b> 26:7	<b>attended</b> 65:25
75:21	119:7 127:7	7:12,18 36:7	63:25 76:24	<b>attention</b> 51:25
<b>action</b> 1:2 5:8	<b>agreed</b> 71:9 81:15	111:3,6 112:8	<b>approve</b> 59:15	92:14,17
77:2 130:12,13	<b>agreement</b> 83:6	114:15 124:19	<b>approved</b> 27:22	<b>attorney</b> 5:19
<b>activities</b> 77:14	83:14,19 91:7	125:4,6	75:19 115:17	6:18 10:7 11:23
<b>actual</b> 90:8	91:10 119:2	<b>answered</b> 24:17	<b>April</b> 15:5 71:13	124:12,21
120:11 126:4	<b>agrees</b> 118:5	93:22	75:13,17	125:10 126:10
<b>Adam</b> 30:11,11	<b>ahead</b> 7:8 22:13	<b>answers</b> 6:7	<b>area</b> 57:16	130:12
<b>addiction</b> 28:10	64:3	<b>antidepressants</b>	<b>areas</b> 87:18	<b>Attorney's</b> 12:1
<b>additional</b> 67:16	<b>aid</b> 62:9	110:1	<b>aroused</b> 38:2	41:11
<b>address</b> 6:22	<b>aide</b> 56:23 57:6	<b>anybody</b> 49:1	<b>arranged</b> 65:25	<b>attorney-client</b>
51:14,19 56:18	61:18,21 62:4	<b>anymore</b> 29:16	<b>arrangement</b> 83:6	122:22 124:25

<p>125:3,5 127:7  <b>attorneys</b> 2:4,9                  122:16  <b>attributed</b> 27:20  <b>authority</b> 62:2                  63:25 129:6  <b>authorized</b> 130:7  <b>available</b> 73:14                  74:5 123:21  <b>aversive</b> 36:3 37:5                  37:23 38:6,17                  38:20 39:13                  96:7,10 98:13                  98:19 100:16,24                  101:7,16 116:1                  116:7  <b>award</b> 78:23                  79:18 80:3,4,14                  80:15,15,19,21                  81:15,17 82:9                  82:15,16  <b>aware</b> 24:8,11                  60:22 61:3,8                  92:8 93:23                  104:17,23</p> <hr/> <p style="text-align: center;"><b>B</b></p> <hr/> <p><b>B-r-y-a-n</b> 17:24  <b>baby</b> 71:13  <b>bachelor's</b> 12:17  <b>back</b> 19:17,20                  21:7 22:22                  24:20 25:3,5,9                  25:11 29:4                  34:25 42:9 68:1                  83:22 84:6 92:1                  94:14 109:25                  114:19 115:22                  118:18 119:8                  120:20,25 121:8                  125:24 126:23                  126:25  <b>background</b>                  12:14 93:24                  94:7</p>	<p><b>bad</b> 33:20  <b>ban</b> 5:21 19:19                  22:18 24:22                  27:7,22 28:4                  32:4 37:3 41:9                  41:17 42:14                  44:4,8 53:14                  56:20 58:3 79:9                  92:23 93:1                  98:19,23 100:19                  100:21 101:1,3                  101:10,25 102:3                  102:8,9 103:10                  104:4 105:13                  106:9 113:14                  115:15 116:3  <b>band</b> 38:1 39:21                  96:15  <b>banned</b> 98:22                  120:24 123:11  <b>banning</b> 99:1                  100:16,24 101:7                  101:16,18,22                  103:19 115:25                  116:7,8  <b>barbaric</b> 53:15                  112:4  <b>base</b> 27:22  <b>based</b> 29:10 38:3                  50:12 51:6,11                  80:20 82:18                  91:11 98:17                  99:1 106:11                  108:18 113:12  <b>basic</b> 18:18 21:8                  125:16  <b>basis</b> 83:9 93:16                  108:25 127:5  <b>Bates</b> 27:1 50:5                  54:5  <b>Bay</b> 1:11 3:8 16:9                  17:6 27:1 54:8  <b>Beach</b> 27:23 61:9                  129:4 130:3  <b>bear</b> 95:13</p>	<p><b>beating</b> 101:5  <b>beginning</b> 3:22                  4:3,6,9,12 87:21                  90:13 101:2,3                  102:1 119:8  <b>begins</b> 58:2 67:7                  70:25 90:9                  106:16 108:7,13                  112:15  <b>behalf</b> 1:8,9,11                  54:8 60:15                  64:10 66:13                  77:7 79:23 94:7  <b>behave</b> 111:1  <b>behaviors</b> 37:8  <b>behaviorial</b> 102:19  <b>believe</b> 15:5 27:19                  48:19 51:5,11                  51:19 52:4,9                  55:4 71:24                  76:13 77:11                  80:21 92:23                  93:25 111:9,12                  122:19 123:13  <b>benefited</b> 108:3  <b>Benoit</b> 3:23 65:4,8                  65:15,17 67:19                  68:5  <b>best</b> 65:9 83:13                  94:11 95:20                  106:13  <b>beyond</b> 28:8 62:3                  104:15 105:25                  106:3 115:15                  119:9  <b>big</b> 57:15  <b>bigger</b> 32:18,19  <b>bigger-named</b>                  80:16  <b>bill</b> 92:25  <b>bisexual</b> 87:7,9  <b>bit</b> 84:12  <b>blend</b> 32:20  <b>Board</b> 15:24,25                  16:5,7,8,10,11</p>	<p>16:13,15,22,24                  16:24,25 17:5,6  <b>Boards</b> 15:22                  16:19  <b>body</b> 68:10 70:24                  77:6  <b>books</b> 16:18  <b>borrowed</b> 121:5  <b>bottom</b> 67:17,22                  68:7 73:5 78:12                  86:18 89:2                  90:21 94:20                  97:5 107:18,18  <b>Boulevard</b> 2:12  <b>Box</b> 2:2,8  <b>boys</b> 33:5  <b>break</b> 7:16 56:8                  85:25 94:11,16  <b>breaking</b> 83:24  <b>breaks</b> 7:18  <b>briefings</b> 124:4  <b>bring</b> 19:6,17,20                  25:5 27:14                  44:12 45:1                  92:17  <b>bringing</b> 22:11                  76:8 124:17  <b>Brittany</b> 70:9                  73:3,8  <b>broad</b> 34:5  <b>broadest</b> 34:6  <b>brought</b> 17:18                  20:6 22:16,17                  22:17 23:16                  38:14 39:15                  41:3 92:13 99:3                  99:6 120:25                  123:19  <b>Bryan</b> 17:24  <b>Buckhorn</b> 17:10  <b>bullied</b> 30:13  <b>bullying</b> 28:8  <b>burn</b> 30:8  <b>BURR</b> 2:7  <b>busier</b> 45:19</p>	<p><b>business</b> 13:13,20</p> <hr/> <p style="text-align: center;"><b>C</b></p> <hr/> <p><b>C</b> 130:1,1  <b>calendar</b> 57:1  <b>calendars</b> 48:24                  123:20  <b>call</b> 26:8 34:21,22                  44:7 48:6 86:24                  99:11  <b>called</b> 30:14 42:1                  44:18,20,23                  64:7 123:14  <b>calls</b> 49:2,6,23  <b>cameras</b> 48:3  <b>cancer</b> 44:16                  109:24  <b>candidate</b> 22:16                  92:21  <b>capacity</b> 1:15                  9:11  <b>career</b> 13:4  <b>careful</b> 92:6  <b>Carrie</b> 3:17,20,22                  4:3,6,10,12                  56:18,22 57:21                  62:21 65:3,7,12                  65:20,20 67:19                  68:4,17 70:3                  73:8 75:10,11                  76:4 78:20 80:2                  80:3,10 81:6                  85:9  <b>Carrie's</b> 63:6  <b>carried</b> 37:7 38:4                  104:5,20 105:1                  105:2,4  <b>case</b> 25:22 52:17                  64:16 93:12                  107:16 109:21                  109:21 110:9,9                  124:21  <b>case-by-case</b>                  93:16 108:25  <b>cases</b> 109:3 118:7</p>
---	--	---	---	---

<p><b>catch</b> 107:17  <b>categories</b> 98:17  <b>category</b> 38:15  <b>Catholic</b> 32:24  104:9,19  <b>causal</b> 107:22  108:20 109:7,8  116:25 119:16  <b>cause</b> 5:6  <b>caused</b> 116:15,20  117:3 118:10  <b>causes</b> 14:8,12,15  103:17  <b>caution</b> 122:21  <b>cavalry</b> 68:16,20  <b>cc</b> 67:19 68:4  <b>cc'd</b> 65:8,17 74:15  <b>cell</b> 65:22  <b>Center</b> 60:12,20  73:16  <b>Centre</b> 78:24  <b>certain</b> 37:8 79:4  <b>certificate</b> 86:11  129:1  <b>certifications</b>  12:25  <b>certified</b> 5:14  <b>certify</b> 25:19  129:7 130:7,11  <b>certifying</b> 86:12  <b>cetera</b> 87:24  <b>chairman</b> 16:6,17  17:4  <b>challenges</b> 124:9  <b>champion</b> 59:24  <b>chance</b> 6:4  <b>change</b> 8:16,17,19  8:25 9:1 36:4  38:21 43:11,12  87:6 99:10  100:7,9 102:18  102:21 103:20  107:5,6 111:1  116:16,21 117:1  117:4 118:10</p>	<p>119:17 124:3  <b>changed</b> 114:2  117:15  <b>changing</b> 54:23  <b>charge</b> 24:15  106:20  <b>checking</b> 73:13  74:4  <b>child</b> 97:14 99:20  105:2  <b>child's</b> 98:10  <b>childhood</b> 104:19  <b>children</b> 99:8  104:4  <b>chime</b> 25:8,9  <b>chooses</b> 100:11  <b>church</b> 34:4,16  104:6,6,9 105:3  105:8,25 106:8  <b>church's</b> 104:15  <b>churches</b> 103:11  103:24 105:13  <b>Cibula</b> 5:2 129:6  129:19 130:5,21  <b>circles</b> 18:2  <b>citations</b> 108:1  <b>cited</b> 37:19 92:15  94:17 95:7,21  118:21 119:14  <b>cities</b> 99:2 100:19  <b>citizen</b> 18:5  <b>city</b> 1:14,15 2:9  2:11 3:10,12,15  5:4,20 8:1,1  9:13,14 10:5  11:5,10 12:1  13:9,13,17 14:4  15:19 16:14  17:4,20 19:15  23:15 24:22  27:6,8 30:20  36:1 40:7,15,18  40:23 41:1,6,11  41:12,19,24  42:2,17,19 43:2</p>	<p>43:6,10,14 44:7  44:11 45:12,20  46:3,5,10 48:2,8  48:9,10 49:17  49:19,23 50:5,7  50:10,13 51:2  51:14,18 52:14  53:3,4 54:7  55:11,13,17  56:17,20 57:4  60:6,11,16,19  61:4,9,17,20,23  63:13,15 66:13  67:6 71:9,21,24  73:25 74:24,25  75:16,21 77:6  83:5,13,18  85:16 86:7,25  87:4 89:14  93:20 94:1,7  98:15,18,25  99:3,19,23  100:16,23 101:6  101:16,18,22  103:19 104:4  105:10,11,15,18  105:20,24 106:2  106:6,8 107:9  109:5,9,19  110:5,13,20  111:3,14,20  112:8 113:12  115:3,9,16,18,24  117:1 118:20  120:4,11 121:10  121:17,18,21  122:1,16 124:21  124:21 127:23  <b>City's</b> 11:3 60:23  76:18 88:4  100:5 103:14  104:3 115:24  116:6  <b>Civil</b> 1:2  <b>claim</b> 84:14</p>	<p><b>claimed</b> 85:2  121:10  <b>clarification</b>  14:23 124:11  <b>clarified</b> 80:19  <b>clarify</b> 34:12  40:14 42:24  83:12  <b>classmates</b> 32:25  <b>clause</b> 86:24  88:21 95:22  <b>clauses</b> 87:22  120:1  <b>clean</b> 86:4  <b>clear</b> 33:15 55:16  59:3,4 71:3  101:6 119:6  120:8  <b>clergy</b> 103:11  104:19 105:2,17  106:9  <b>clerk</b> 46:14  <b>clerk's</b> 46:13  86:11  <b>client</b> 37:7 38:5  39:2,2,3,4  124:20  <b>client-directed</b>  39:9  <b>clients</b> 1:11  <b>clinician's</b> 90:15  <b>clipped</b> 95:20  <b>close</b> 16:17  <b>closely</b> 24:6  <b>closer</b> 80:5  <b>coercive</b> 96:19,25  97:10,13,19  98:6,8,14 99:22  101:19  <b>coffee</b> 57:2 66:14  <b>colleague</b> 128:7  <b>college</b> 12:23 13:4  32:16,19 35:17  35:20 117:10  <b>column</b> 106:15</p>	<p>108:7  <b>come</b> 7:24 22:15  24:20 32:16  40:25 44:12,14  44:17 60:2 74:7  82:25 83:1,3,10  88:17 110:24  115:20 117:14  118:1 120:2,20  125:24  <b>comes</b> 22:21 24:5  25:9,11 40:24  60:18 109:25  124:2  <b>comfortably</b>  115:20  <b>coming</b> 15:6  61:21 76:20  77:22 112:5  117:23 124:3  <b>comment</b> 44:6  45:4 74:23  76:21 77:5 85:3  <b>commented</b>  101:14  <b>comments</b> 10:21  111:10  <b>Commission</b>  129:20  <b>commit</b> 28:15  110:3  <b>committed</b> 21:20  28:6 111:25  <b>committees</b> 15:20  <b>committing</b> 21:14  <b>common</b> 28:17  30:5 52:14  114:1  <b>communicate</b>  64:1  <b>communicated</b>  60:13,16 73:18  77:8  <b>communicating</b>  64:9 65:13</p>
---	---	--	---	---

74:10 <b>communication</b> 54:13 57:9 61:4 61:19 71:15 72:17 73:1 76:9 79:25 81:4 82:12 84:10 124:22 126:18 <b>communications</b> 45:13 46:15 49:14 57:17 60:6,19,25 61:8 69:16 77:17 82:18,21 123:1 124:20 <b>communities</b> 115:12 <b>community</b> 16:16 16:25 52:2 79:5 79:7 <b>companies</b> 13:6 <b>compel</b> 97:14 <b>compelling</b> 115:4 115:8,25 116:12 120:4 121:9,10 121:21 <b>complaints</b> 24:12 40:7,21,24 41:6 41:21,23 <b>complete</b> 102:8,9 106:16 118:20 <b>completely</b> 82:13 99:10 105:7,14 <b>compliment</b> 76:8 <b>comport</b> 98:3 <b>comprehensive</b> 98:23 100:20,21 101:1 102:3 113:14 <b>computer</b> 107:17 <b>conclude</b> 107:3 108:7,16 109:1 109:2,18 <b>concluded</b> 106:17 116:24 128:13	<b>conclusion</b> 91:6 100:12 112:20 113:8 117:10,15 117:24 118:1 120:3 <b>conclusions</b> 88:18 114:11 117:21 <b>condition</b> 9:20 <b>conductive</b> 6:17 <b>conduct</b> 38:4 41:12 96:14 <b>confirm</b> 65:11 <b>congratulated</b> 81:24 <b>congratulations</b> 75:11 <b>connected</b> 130:12 <b>connection</b> 36:25 37:2 44:22 47:11 49:21 55:1,13 57:18 58:21 60:7,21 61:5 66:7,11 70:13 73:23 74:18 77:2,9 85:17 88:6 96:2 98:16 109:7 118:18 119:16 <b>Connolly</b> 4:7 70:3 73:7 <b>consensus</b> 118:6 118:13 <b>consent</b> 21:13 97:25 <b>consider</b> 22:10 52:2 61:19 98:19,25 99:19 99:23 100:16,23 101:7,16,18,22 103:19 <b>consideration</b> 43:18 47:11 85:4 118:19 <b>considered</b> 23:8 38:20 49:20	50:23 53:9 81:1 85:16 88:5 92:19 98:16 101:13 102:4 113:15 <b>considering</b> 117:15 <b>consistent</b> 97:18 <b>consisting</b> 86:10 <b>constituents</b> 1:11 45:13 48:12,17 49:3,14 <b>constitute</b> 30:1 <b>consult</b> 128:6 <b>contemplated</b> 112:1 <b>content</b> 29:23 121:3 122:3 124:15 127:18 <b>contents</b> 126:7 <b>context</b> 9:4 29:17 <b>continue</b> 89:19 116:12 <b>CONTINUED</b> 4:1 <b>continuing</b> 112:23 <b>contrary</b> 98:1 <b>contributed</b> 117:23 <b>contribution</b> 79:20 <b>control</b> 105:25 <b>conversation</b> 6:9 10:7 66:18,22 84:14 117:15 127:18,21,22 <b>conversations</b> 48:12,16 49:13 59:12 61:12 66:20 <b>conversion</b> 5:21 8:5,22,24 14:17 18:11 19:1 20:3 20:7,10 22:10 23:2,8,14,24	24:9,12,21 27:7 28:4 31:16 32:4 34:19 40:8,25 41:6,17 42:2,11 42:22 44:8,22 52:3,4 53:14 54:21 56:20 62:22 79:10 85:2,19 98:24 99:4 100:18 101:3 105:8,17 106:7,10 110:15 115:15 116:1,2 116:3 <b>convincing</b> 119:6 <b>coordination</b> 60:25 <b>copied</b> 70:4 <b>copies</b> 46:16 73:8 88:8,24 <b>copy</b> 9:24 46:4 86:4,7 95:14,14 95:20 <b>correct</b> 14:19 17:14 23:23 24:1 44:3 47:7 48:14 50:24 53:10 61:6 63:8 63:24 64:25 71:6 82:14 83:13,17,18 88:4 89:13 90:10 92:4,5 100:15,23 103:17 104:16 114:17 123:6 125:15 130:9 <b>correction</b> 80:20 <b>correctly</b> 24:19 29:21 58:4 65:9 72:8,9 78:18,25 80:7 84:16 87:12 107:1 108:4,10 112:22 112:23 113:5,10	116:17 <b>COT</b> 27:1 50:5 53:3 54:6 56:17 64:17 67:6 69:21 75:4 78:4 84:8 <b>council</b> 3:10,15 9:14 13:9,13,17 14:4 15:19,21 16:14,21 17:4 17:20 19:21 23:15,20 25:8 27:6,9,10 43:6 43:18 44:7,11 44:13,23 45:3,6 45:12,21 46:2,3 46:6,25 47:10 47:12,18,21,24 48:3,8,10,11 49:17,19 50:8 50:10,13,16,23 51:2,14,18 52:15 53:5,14 54:7 55:11,13 55:17,19 56:2,3 56:20 57:7 61:17 71:9,21 71:25 74:24,25 75:16,21 77:6,9 85:16 86:25 87:4 88:16,23 89:4,14,21 91:23 93:7,10 93:19,23 102:7 105:10 112:2 115:16 120:12 121:17,18 122:1 122:1,9 123:17 123:25 124:1,4 124:5 126:9 <b>Councilman</b> 1:19 3:2 5:1,12 61:18 81:10 122:20 125:2 <b>counsel</b> 2:2
---	--	--	---	--

130:12 <b>counseling</b> 15:2 21:9 28:24 29:20,25 31:7 31:13 32:9,11 33:1,10,12,16,19 34:14 35:1 38:23 93:24 94:4 105:9 110:15 111:8,16 111:23 <b>counselor</b> 21:6 30:7 31:9 33:23 <b>counselors</b> 35:25 119:3 <b>count</b> 94:19 <b>country</b> 117:16 <b>County</b> 3:13 5:4 61:9 129:4 130:3 <b>couple</b> 53:13 86:15 91:16 118:17 <b>course</b> 22:19 28:5 43:9 79:18 93:5 115:11 121:24 <b>court</b> 1:1 5:8,9 51:9,10 59:6 61:1 86:8 124:9 126:25 <b>Court's</b> 59:4 92:6 <b>cover</b> 121:16 <b>covered</b> 35:22 98:13 100:15,20 100:22 121:22 <b>covering</b> 101:25 116:4 <b>covers</b> 121:15,15 <b>CRA</b> 16:15 <b>create</b> 105:22 <b>created</b> 73:23 <b>credit</b> 76:7 79:18 <b>criminal</b> 105:6 106:2 <b>critical</b> 87:7	<b>crowd</b> 32:20 74:22 <b>cure</b> 109:23 <b>cured</b> 109:25 <b>current</b> 15:4 16:16 <b>currently</b> 9:15 <hr/> <b>D</b> <b>D</b> 2:14 <b>d/b/a</b> 1:10 <b>damaging</b> 53:15 <b>Dan</b> 3:23 65:4,8 65:15,17 66:4 67:19 68:5 <b>date</b> 1:23 50:20 53:8 54:9 56:17 75:13 81:19,20 <b>dated</b> 3:10,13,15 3:18,20,23 4:4,7 4:10,13 27:7 53:7 54:9 62:18 65:4 130:14 <b>DAVID</b> 1:9 2:13 <b>David.harvey@...</b> 2:14 <b>day</b> 7:14 75:17,24 83:10 129:10 130:14 <b>days</b> 12:7 19:9,13 74:20 <b>dead</b> 20:13 <b>deal</b> 124:15 <b>deals</b> 107:4 <b>dearth</b> 108:8 <b>death</b> 21:15 <b>debate</b> 26:9,13 <b>debated</b> 101:14 102:8 <b>decade</b> 113:20 114:8 <b>December</b> 19:11 59:5,10,13 78:14 80:2,9,10 80:13 81:5	129:21 <b>deck</b> 72:5 <b>Defendant</b> 60:25 <b>Defendants</b> 1:17 3:6 10:4 <b>deficiency</b> 87:11 <b>define</b> 97:8,10,13 97:24 <b>defined</b> 20:3 <b>definition</b> 18:25 36:6 98:3 <b>definitive</b> 111:19 114:15 <b>degree</b> 12:17,19 12:21 <b>degrees</b> 12:23 <b>demonstrated</b> 6:8 <b>demonstrating</b> 87:5 <b>DEO</b> 1:10 <b>department</b> 19:15 19:23 24:16,20 120:13,14,15,17 122:2,12 123:13 123:24 <b>depends</b> 117:24 <b>deposition</b> 1:19 5:1,6,24 6:14 7:24 9:24 10:5 11:3,16 59:7 60:24 114:24 130:8 <b>Depositions</b> 3:5 10:4 <b>depression</b> 111:7 111:15 <b>depth</b> 95:11 <b>describe</b> 31:16 102:19 <b>described</b> 25:25 26:17 35:25 <b>Describing</b> 122:24 <b>deserving</b> 79:12 <b>designated</b> 102:14	<b>designee</b> 60:23 128:12 <b>desires</b> 99:21 <b>detail</b> 23:13 89:3 <b>details</b> 35:10 <b>determined</b> 110:7 <b>development</b> 121:24 <b>difference</b> 36:3,8 96:7,19 100:6 <b>different</b> 8:18 28:10 80:15 87:19 98:12 101:15 105:7,14 107:7 109:14 110:18 111:13 112:6 117:8,21 117:21,22 123:10 <b>differentiate</b> 103:6 <b>differently</b> 110:19 <b>difficult</b> 22:5 <b>Dillard's</b> 13:7 <b>direct</b> 3:2 5:16 58:6 <b>direction</b> 61:23 61:23 <b>directive</b> 69:5 <b>directly</b> 20:16 47:12 65:2 67:12 77:2,8 80:1 <b>director</b> 57:15 68:12 <b>disagree</b> 85:9,11 108:22 109:9,10 109:19,20 110:6 114:11 <b>disagreed</b> 92:14 <b>disagreement</b> 109:5 <b>disagrees</b> 92:9 <b>disclose</b> 126:17,20 <b>discourage</b> 37:8	<b>discovery</b> 27:1 <b>discredited</b> 54:22 <b>discuss</b> 44:17 47:20 48:4 58:20 70:22 98:19 122:3 123:16 126:7 <b>discussed</b> 43:7 47:17 54:11 59:1 67:9,13 84:12 117:18 <b>discusses</b> 27:6 <b>discussing</b> 119:10 <b>discussion</b> 25:7 26:10,13 27:9 47:23 84:3 88:13 124:8 <b>discussions</b> 43:8 82:4 122:4 <b>disease</b> 87:10 <b>disgusting</b> 30:4 <b>disorder</b> 87:10 <b>distinction</b> 39:13 96:18 <b>distinctions</b> 39:15 <b>District</b> 1:1,1 9:14 61:19 <b>Division</b> 1:2,16 <b>doctor</b> 109:22 <b>doctors</b> 104:13 <b>document</b> 48:21 50:3 53:1 54:2,5 62:17 86:9 107:24 108:2 119:25 <b>documentation</b> 114:4 <b>documents</b> 11:13 11:18 <b>doing</b> 78:21 106:8 <b>domestic</b> 115:15 <b>Dotson</b> 3:10 50:18 52:1,10 <b>downward</b> 21:16 <b>draft</b> 19:15 25:5
--	--	--	---	--

26:3 27:18 70:25 71:8 72:2 88:15 126:4 127:18 <b>drafted</b> 120:10,17 <b>drafting</b> 94:8 122:18 <b>drank</b> 21:15 <b>draw</b> 51:25 112:20 113:7 116:25 <b>drinking</b> 99:25 <b>drug</b> 28:10 <b>drugs</b> 28:16 <b>drum</b> 69:5 <b>due</b> 47:19 95:20 106:20 <b>duly</b> 5:13 129:8 <b>duties</b> 62:3	55:13,18,23 63:14 64:16 76:11 78:5 112:3 <b>earlier</b> 22:17 29:10 92:24 96:6 112:3 117:17 127:9 <b>earliest</b> 64:19 67:7 78:9 <b>early</b> 81:20 119:10 <b>easier</b> 33:5 120:22 <b>East</b> 2:12 <b>education</b> 12:15 <b>effective</b> 112:21 113:9 <b>effects</b> 24:12 <b>efficacy</b> 107:23 108:21 <b>efforts</b> 8:16,18,19 8:25 9:1 43:11 43:12 87:6 102:18 103:20 107:5,6 116:16 116:21 117:1,4 118:10 119:17 <b>eight</b> 86:10 113:21 <b>eighteen</b> 28:5 <b>eighty-twenty</b> 110:11 <b>either</b> 45:14,21 55:14 82:5 105:21 108:20 <b>either/or</b> 118:2 <b>elastic</b> 38:1 39:21 <b>elected</b> 13:23 14:3 58:13 115:22 <b>election</b> 15:9,10 <b>electric</b> 37:25 <b>electronic</b> 95:24 119:25 <b>electroshock</b> 21:8 28:22 29:4,5,11	31:12 38:8 39:22 <b>element</b> 96:11 <b>eleven-thirty-two</b> 78:14 <b>eligible</b> 15:13 <b>Email</b> 2:5,6,10,14 2:15 <b>employee</b> 34:15 57:4 130:11 <b>employment</b> 13:12 <b>enacted</b> 40:11 45:7 58:24 92:18 93:6 120:19 125:14 <b>enacting</b> 40:5 88:6 93:14 94:8 105:15 121:11 121:22 <b>enactment</b> 10:13 25:4 42:19 49:16 102:2 118:19 121:25 122:7 125:20 <b>encompasses</b> 127:8 <b>ended</b> 21:14 <b>English</b> 12:22 <b>Enhancement</b> 1:16 <b>entail</b> 56:24 <b>entailed</b> 35:11 <b>enters</b> 114:24 <b>entire</b> 103:5 <b>eqlflorida</b> 57:14 <b>equal</b> 89:1 <b>equality</b> 57:14,18 57:21 58:3,7,15 58:20 59:13,17 59:22 60:6 61:1 61:16,20 65:12 66:23 74:11 76:19 77:1,8,15 78:21,23 79:3	79:11,13,15,20 80:4,5,11,15,19 82:4,22 83:7,7 83:14,15,19 84:10 <b>equally</b> 100:10,13 <b>Erica</b> 3:10 50:18 52:1 <b>Ernie</b> 122:14,15 <b>erotic</b> 38:2 <b>especially</b> 109:10 111:9 <b>ESQUIRE</b> 2:5,6 2:10,13,14 <b>essentially</b> 21:15 29:2 <b>Estuary</b> 16:10,24 17:6 <b>et</b> 87:24 <b>evaluated</b> 112:18 113:5 <b>Eve</b> 30:11 <b>event</b> 70:21 81:21 84:18 <b>everybody</b> 46:4 49:8,17 50:8 110:18 <b>Everybody's</b> 110:18 <b>evidence</b> 42:17,20 43:3,10,14 85:16 91:8 107:22 108:20 109:8 111:24 112:24,25 118:2 118:23 <b>evolved</b> 29:14 <b>exact</b> 81:20 105:19 <b>Exactly</b> 114:18 <b>EXAMINATION</b> 3:2 5:16 <b>example</b> 29:19 30:2 32:8 99:6 99:25 102:19	109:6 110:15 116:1,7 <b>examples</b> 30:19 31:2 37:12,23 38:3 55:11,17 <b>exciting</b> 80:18 <b>exclamation</b> 71:14 <b>Executive</b> 102:13 <b>exempt</b> 103:10,12 <b>exempted</b> 103:24 106:12 <b>exempting</b> 105:13 <b>exhibit</b> 3:4,7,9,11 3:14,16,19,21 4:2,5,8,11,14 9:25 10:1,3 26:21,21,23 50:1,4 52:24 53:2,25 54:3 56:13,14 62:15 64:13,15,24 67:3,5,9,14 69:18 75:1,3 77:23,25 84:6 86:4 95:15,16 114:20 <b>exhibits</b> 3:3 4:1 56:12 <b>exist</b> 13:22 <b>expectation</b> 24:17 41:10 <b>expectations</b> 41:19 <b>experience</b> 15:1 33:20 34:20 94:4 111:21 <b>experienced</b> 18:25 19:3 20:3 20:10,17,23,23 21:4 34:19 35:19 113:1 <b>Expires</b> 129:21 <b>explained</b> 31:14 <b>explanation</b> 93:8
<b>E</b>				
<b>E</b> 130:1,1 <b>e-mail</b> 3:10,12,15 3:17,20,22 4:3,6 4:9,12 46:1,5 50:9 51:14,18 51:24 52:20 53:4,12,18,22 54:6 56:2,5,16 56:18 57:22,23 58:17 59:15 60:4,5 61:6,15 62:5,8,18,23 63:3,5,8,11,18 64:4,5,9,19,22 65:14,21 66:9 67:6,7,9 68:11 69:3,22 70:4,24 71:8 73:20 74:14 75:5,18 77:17,25 78:4 80:9,13 84:8,9 <b>e-mails</b> 45:20 47:5,16,18 52:12,17 55:9				

<p><b>exposition</b> 93:9 <b>exposure</b> 116:15 <b>express</b> 104:12 <b>expressed</b> 98:1 <b>expression</b> 54:24 <b>extent</b> 101:14 127:22</p> <hr/> <p style="text-align: center;"><b>F</b></p> <p><b>F</b> 130:1 <b>F-a-r-r-i-s</b> 17:25 <b>face</b> 28:14 99:9 <b>facility</b> 35:4 <b>fact</b> 19:25 23:7 24:25 41:20 51:6,12 65:11 70:15 72:16 85:22 86:12 99:14 119:2 <b>facts</b> 9:16,21 85:16 <b>fair</b> 38:11,15 44:21 49:18 51:16 64:8 82:21 83:5 85:15,20 98:10 121:20 <b>fairly</b> 24:6 <b>fall</b> 59:25 <b>familiar</b> 27:4 44:10 54:15 57:20 59:23 <b>family</b> 115:20 <b>far</b> 28:11 58:13 66:10 67:2 80:11 83:2 92:6 122:24 123:21 <b>Farris</b> 17:25 18:1 18:8,19,24 20:2 22:10 23:16 24:7 <b>faster</b> 107:16 <b>fat</b> 30:4,4,4 <b>father</b> 22:1,4 23:12 31:6</p>	<p>33:12 99:15 <b>father's</b> 22:24 99:9 <b>favorably</b> 85:18 <b>Fax</b> 2:4 <b>fear</b> 99:13 <b>February</b> 27:9 50:20 56:17 62:18 65:4 68:3 69:3 78:23 81:19 <b>federal</b> 104:8 <b>feel</b> 92:16 100:1 <b>feelings</b> 111:7,15 <b>fellow</b> 47:24 93:23 <b>felt</b> 32:17 93:11 <b>FF</b> 129:20 <b>field</b> 15:2 50:12 <b>fifty</b> 21:8 28:24 110:22 <b>fifty-fifty</b> 110:11 <b>fifty-nine</b> 97:4,10 <b>filed</b> 86:7 <b>filing</b> 86:10 <b>final</b> 26:12 71:25 75:21 90:22 106:22 126:1 <b>financial</b> 79:20 <b>financially</b> 130:13 <b>find</b> 32:14 36:17 39:3 41:15 79:12 95:19 <b>finds</b> 87:1,4 <b>fine</b> 110:2 127:14 <b>finish</b> 6:4 84:5 <b>first</b> 5:13,23 19:14 23:21 25:6,12 25:15,16,18,22 26:9 27:24 33:5 33:9 34:25 36:20 41:3 42:4 42:6 53:13 54:9 56:22 60:3 67:17,23 68:10 68:15 70:2,10</p>	<p>70:25 71:2,4,10 71:11,15 72:2 80:9,17 84:9 88:12,12 90:8 102:1 104:1 107:21 112:14 116:12 122:6 126:2 <b>fit</b> 18:25 <b>fits</b> 28:17 <b>five</b> 56:8 <b>Florida</b> 1:1,14,24 2:3,8,12 5:3,5 12:18 22:19 57:14,18,21 58:7,15,21 59:13,17,22 60:7 61:1,17,20 65:12 66:23 74:11 76:19 77:1,8,15 78:21 79:3,12,14,15,20 80:11 82:4,22 83:7,7,14,15,19 84:10 129:3,20 130:2,6 <b>Florida's</b> 58:3 <b>flow</b> 10:12 <b>Focusing</b> 121:8 <b>folks</b> 72:17 <b>follow</b> 22:20 24:6 93:1 123:15 125:7,7 <b>follow-up</b> 80:10 <b>followed</b> 52:10 53:21 55:5 <b>following</b> 12:15 13:4 79:25 87:18 <b>follows</b> 5:14 <b>footnote</b> 90:23,24 97:4,7 102:14 103:5 <b>force</b> 4:16 94:22 95:1 97:17</p>	<p>106:23,23 107:10 116:24 <b>forced</b> 29:2 52:5 53:16 100:11 <b>forces</b> 15:20 <b>foregoing</b> 130:8 <b>forgive</b> 30:9 35:22 <b>forgot</b> 16:9 <b>form</b> 27:21 28:1 30:15 97:16 <b>formal</b> 82:23 83:6 <b>FORMAN</b> 2:7 <b>format</b> 95:24 <b>forms</b> 112:21 113:8 <b>forthcoming</b> 106:24 <b>forty</b> 21:7 <b>forty-nine</b> 90:24 <b>forty-three</b> 112:12 118:4 <b>forty-two</b> 107:14 107:18 <b>forum</b> 25:10 43:24 45:19 47:21 <b>forward</b> 25:7,18 26:5 27:15,17 31:20 38:14 39:16 41:4 45:9 72:1 88:14 90:12 98:23 106:13 107:13 114:7 122:5 <b>found</b> 69:13 112:15,17,24 113:3 119:16,25 <b>four</b> 69:24 86:16 90:12,13 91:1 92:2 101:15 115:2 121:9 <b>four-two</b> 118:4 <b>fourteen</b> 20:21 90:23,24 <b>Franklin</b> 1:23 5:3</p>	<p><b>free</b> 48:11 <b>freedom</b> 32:18 104:1,2,12 <b>freewill</b> 62:5 110:25 <b>Friday</b> 80:2 81:4 <b>friend</b> 17:18,23 33:15,18 <b>friendly</b> 115:18 <b>friends</b> 20:11,12 24:3 <b>front</b> 11:15 68:1 86:12 <b>full</b> 80:5 <b>full-time</b> 13:10,24 93:21 <b>further</b> 7:21 21:9 23:5,12 83:24 89:3 96:21 109:17 114:7 116:11 128:10 130:11</p> <hr/> <p style="text-align: center;"><b>G</b></p> <p><b>G</b> 2:5 <b>G-L-S-E-N</b> 54:8 <b>gain</b> 35:16 <b>gala</b> 78:23 79:3 81:18,23 <b>Gannam</b> 2:6 3:2 5:17,18 10:2,14 10:17,21,24 11:1 14:22,25 26:24 34:5,12 34:13 37:17,22 43:2,4 50:2 51:13 52:25 54:1 56:7,10,15 58:25 59:8 62:16 64:14 67:4 68:24 69:19 75:2 77:24 78:2,3 82:16,17 84:2,4 86:2 94:10,14</p>
--	--	---	---	--

94:15 95:17 114:25 123:4 124:13 125:9,12 126:3,21,23 127:1,12,14,15 128:4,10 <b>gathering</b> 72:15 <b>gay</b> 18:15 20:12 22:1,2 24:4 32:17 33:14 40:1 80:23 84:15,22 87:7,9 <b>gender</b> 8:17,25 29:17 32:12 33:2 36:5 38:21 43:11 54:24 87:6 100:8 106:22,23,24 107:5,11,11 114:1 116:16,20 117:4,17 118:10 119:17 <b>general</b> 19:20 23:24 30:25 44:18 46:23 79:5 98:24 100:20 101:4,25 102:7 112:5 115:10 116:4 117:10 118:5,5 118:13 123:23 <b>generalization</b> 76:16 109:15 <b>generally</b> 8:23 23:22 25:11 26:18 35:17 38:5 52:18 76:14 96:10 97:2,18 98:3 104:17,22 124:2 125:13 <b>gentleman</b> 28:6 84:21 85:6 <b>getting</b> 39:22 77:15 83:3	<b>Girls</b> 33:6 <b>give</b> 6:4,10 12:15 13:3 31:5 47:25 95:14 114:15 124:6 <b>given</b> 5:24 69:4 79:19 98:12 101:13 103:22 106:6 112:19 116:21 130:10 <b>gives</b> 37:12,23 <b>giving</b> 79:17 <b>GLORIA</b> 1:10 <b>GLSEN</b> 54:8,15 54:17 55:5 <b>go</b> 5:22 7:8,21,23 22:13,22 27:17 33:16 34:25 39:4 52:5,17 64:3 68:1 73:4 74:23 76:7 80:24 83:22,23 84:7 88:17 89:3 89:10 90:5 91:11 93:17 94:18 96:21 109:24 113:7 114:13 119:7,21 127:10 <b>God</b> 30:9 <b>goes</b> 46:2 63:12 63:13,22 71:12 75:19 92:7 98:6 115:10 116:14 119:5 126:8 <b>going</b> 7:14,23 21:7 30:8,24 31:2 39:25 40:3 47:25 51:25 53:12 56:7,11 64:19 72:23 74:23 89:5 90:12 92:1 95:14,15 97:3 104:16 106:15	110:18 111:1 124:13,24 125:1 127:1,6 <b>good</b> 5:18 18:14 69:24 97:2 114:22 122:24 <b>googled</b> 80:14 <b>government</b> 104:8 115:21 <b>governor</b> 22:16 92:22 <b>governor's</b> 92:21 <b>graduate</b> 32:21 <b>Graham</b> 22:17 92:22 <b>grateful</b> 76:3,17 77:13 <b>great</b> 78:21 <b>Greenspan</b> 3:20 <b>ground</b> 5:22 <b>group's</b> 60:17 <b>groups</b> 102:25 103:1 <b>growing</b> 20:12,14 24:3 <b>guarantee</b> 109:23 <b>guess</b> 57:24 63:15 104:16 124:14 125:23 126:22 <b>guideline</b> 90:15 <b>Guido</b> 1:19 3:2 5:1,12 9:10 27:11 61:18 78:22 129:7 <b>Guido's</b> 79:9 <b>guys</b> 83:24 <b>Gwen</b> 22:17 92:22	<b>hand</b> 5:9 96:20 100:6,8,9 103:7 129:10 <b>handed</b> 95:21 <b>handing</b> 9:24 53:1 54:2 75:3 77:25 86:3 <b>handle</b> 95:18 100:2 <b>handles</b> 46:14 57:1,15 <b>hands</b> 72:5 <b>Hanna</b> 67:20 <b>Hannah</b> 4:7,9 68:4,6,11 70:3 73:2,7 75:10 <b>hannah@eqfl.org</b> 4:3 67:19 <b>happen</b> 49:18 <b>happened</b> 33:18 40:11 45:11 66:9 111:25 <b>happening</b> 24:9 42:12 59:21 82:21 <b>happens</b> 25:3 <b>happily</b> 84:23 <b>harm</b> 40:25 41:6 41:21,23 42:11 42:20 43:10 100:6 103:17 107:23 108:17 108:21 109:3,8 109:18 110:6 113:1 114:16 116:25 119:18 <b>harmed</b> 40:8 107:25 108:24 109:4 <b>harmful</b> 28:3 30:15 91:8 99:21,24 100:3 100:10,13 103:15,23 104:4 104:5 105:21	106:7 112:5 117:11,25 118:6 119:2,7 120:3,3 <b>harms</b> 116:15,20 117:3 118:9 <b>HARVEY</b> 2:13 <b>head</b> 6:10 <b>heading</b> 107:19 108:6 <b>headline</b> 27:6 <b>health</b> 15:2 87:7 93:24 94:3,4 102:23 <b>Healthcare</b> 90:14 <b>hear</b> 24:2 28:7,23 <b>heard</b> 20:16,19 21:7,21 22:7 23:25 29:5 31:1 36:14 54:17 64:5 <b>hearing</b> 20:14 30:21 43:19 73:14 74:6 77:4 83:4 84:20 93:17 111:9 121:2 <b>hearings</b> 42:25 43:1 74:12,20 111:11 <b>HEARTS</b> 1:10 <b>held</b> 48:2,9 75:17 <b>hell</b> 30:8 <b>help</b> 10:25 26:18 52:7 65:8,18 83:15 <b>helped</b> 84:15 85:2 85:19 <b>helpful</b> 62:6 <b>helping</b> 79:9 82:5 <b>Henriquez</b> 3:17 3:20,23 4:3,7,10 4:13 56:18,22 58:6,14,20 59:2 59:12,16 61:16 62:2,13,21
<b>H</b>				
<b>H</b> 1:9 <b>half</b> 14:1 <b>halfway</b> 64:20 67:8 108:13 <b>Hall</b> 48:9 49:23 66:14 93:20				

<p>63:17,25 64:9 65:3 66:19 67:19 68:4,17 68:19 69:5 70:3 71:18 72:10,16 74:10 75:10 76:4 77:18 80:2 81:6 82:19 84:10 <b>hereinafter</b> 5:14 <b>hey</b> 47:1 75:11 <b>Hi</b> 65:7 78:20 80:2 <b>high</b> 12:15 24:4 30:13 31:4 32:7 32:10,14,16,18 32:21,23,24,25 35:20 <b>Hillsborough</b> 5:5 15:24 16:4,23 <b>hits</b> 30:3 <b>Hmihet@lc.org</b> 2:5 <b>Hoch</b> 61:9,13 <b>hold</b> 15:19 16:20 17:7 18:3 <b>homework</b> 89:19 <b>homosexuality</b> 91:9 <b>honor</b> 81:11 <b>hope</b> 78:20 <b>HORATIO</b> 2:5 <b>horse</b> 101:5 <b>hospital</b> 44:16 <b>Hospitality</b> 78:24 <b>hour</b> 56:8 <b>hours</b> 12:9 <b>house</b> 92:24 <b>humans</b> 110:24 <b>hundred</b> 91:16 110:10 <b>hunted</b> 95:18 <b>hurtful</b> 112:4 <b>husband</b> 30:2</p>	<p style="text-align: center;"><b>I</b></p> <p><b>idea</b> 17:18 18:14 19:6 20:6 22:11 23:16 24:7 27:10 29:6 <b>identification</b> 3:5 3:7,9,12,14,17 3:19,22 4:2,6,9 4:12,15 10:1 26:23 50:1 52:24 53:25 56:14 62:15 64:13 67:3 69:18 75:1 77:23 95:16 117:17 <b>identified</b> 8:23 37:12 50:9 87:14 88:1 89:15 92:3,9,10 107:10 114:10 <b>identify</b> 119:20 <b>identity</b> 8:17,25 29:17 32:12 33:2 36:5 38:21 43:11 54:24 87:6 100:8 106:22,24 107:6 107:11 114:1 116:16,20 117:4 118:10 119:17 <b>illness</b> 87:10 <b>images</b> 38:2 <b>immediately</b> 13:16 73:4 <b>implement</b> 105:23 <b>important</b> 6:3,7 6:11 <b>incidences</b> 111:2 <b>include</b> 8:24 42:10 85:18 107:9 127:18,22 <b>included</b> 106:8 <b>includes</b> 10:4 53:16</p>	<p><b>including</b> 42:25 102:24 118:15 <b>inclusive</b> 115:17 <b>incredible</b> 76:2 79:11 <b>INDEX</b> 3:1 <b>indicate</b> 21:11 23:1 112:25 <b>indicated</b> 82:8 <b>indicating</b> 45:21 <b>individual</b> 37:25 38:1 47:10,11 56:2,3 79:16 118:7 122:9 124:5 <b>individual's</b> 97:25 <b>individually</b> 1:8,9 1:11 11:11 122:2 123:25 <b>individuals</b> 79:4 102:23 112:25 117:22 <b>inducing</b> 37:24 96:15 <b>industry</b> 13:8 <b>information</b> 19:18 24:24 25:23,24 29:11 41:9 42:9,10 44:13 45:5,8 88:11 89:17 91:4 92:20 93:9 98:22 108:18 113:22 117:2 119:1 120:20 124:1 <b>initial</b> 88:11 94:2 125:20,23 <b>initials</b> 8:9,12 <b>initiated</b> 94:3 <b>injury</b> 9:19 <b>input</b> 82:23 93:18 94:7 <b>instance</b> 1:20 5:7 <b>instances</b> 24:8</p>	<p><b>instructions</b> 69:5 <b>instructive</b> 127:8 <b>intending</b> 65:19 <b>interest</b> 18:10 115:4,8,25 116:7,8,13 120:4 <b>interested</b> 130:13 <b>interests</b> 13:13 121:9,10,21 <b>INTERNATIO...</b> 1:10 <b>internet</b> 22:15 <b>interrupt</b> 34:9 <b>Interruption</b> 51:9 <b>intimidate</b> 99:15 <b>intimidation</b> 97:16 98:7,9 99:7,17,18 <b>intrude</b> 124:25 <b>intrudes</b> 125:3 <b>invade</b> 122:21 <b>invades</b> 127:6 <b>investigate</b> 41:5 41:20 <b>investigation</b> 41:13 <b>investing</b> 115:11 <b>involuntary</b> 96:20 96:25 97:24 98:4,9,14 99:6 99:16,22 100:8 101:23 103:16 <b>involve</b> 39:4 96:11 124:8 <b>involved</b> 14:7,11 14:14,16 18:19 29:8,20 64:24 73:1 74:12 94:2 98:7 103:1 106:3,4 <b>involves</b> 29:6 37:6 98:8 <b>irrelevant</b> 124:23 <b>issue</b> 14:7 17:13</p>	<p>22:20 48:25 52:22 86:7 115:14 <b>issued</b> 90:15 <b>issues</b> 23:24 59:24 <b>item</b> 60:24 124:3</p> <p style="text-align: center;"><b>J</b></p> <p><b>January</b> 19:10 27:8 <b>JERROD</b> 2:14 <b>Jerrod.simpson...</b> 2:15 <b>job</b> 13:10 58:9 93:21 120:22 <b>joining</b> 13:16 <b>judicial</b> 86:8 <b>jurisdiction</b> 105:12,14,24</p> <p style="text-align: center;"><b>K</b></p> <p><b>Kaitlin</b> 4:7 70:3 73:7 <b>keep</b> 66:19 <b>Kennedy</b> 2:12 <b>kids</b> 31:4 32:7 <b>kind</b> 13:3 17:16 21:6 23:2,8,14 28:9 29:7,20,24 29:25 32:11 34:19 35:3 37:6 38:3 39:4,9,18 39:20 41:12 59:20 62:1 66:1 66:10 72:13,25 79:20 93:8 94:3 94:6 96:14 98:8 116:7 <b>kinds</b> 31:24 38:11 49:14 98:13 113:14 <b>knew</b> 20:2,13 22:23 32:7 34:18 49:9 81:14</p>
--	---	--	--	--

<p><b>know</b> 6:1,8,16,22 7:16 11:4,9 16:17 17:20 18:1,19,22,23 19:3,9,12,18,19 20:7,9,14,22 21:6,7,7,8,25 22:2,3,4,14,15 22:16,18,20 23:5,7,10,11 24:2,4,5,6,23 28:6,8,12,13,13 28:15,16,18,19 28:23,25 29:1,2 29:7,16 30:3,5,5 30:7,8,9,9,10,14 30:14,16 31:5,6 31:8,9,10,23 32:9,14,17,18,19 33:22,25 34:2,6 34:9,14,17 35:2 35:3,6,7,9,10,24 36:5,8,9,11 37:8 38:3,5,12,22 39:3,17,19,21,22 39:24 40:2,10 40:22,22,24 41:2,18,22 42:3 42:15,21,23 43:13,25 44:16 44:16,17 45:9 45:14 46:12,13 46:17 47:4,9 48:5,10 49:9,10 50:18 52:3,18 52:19,20 55:22 55:23,24,25 56:1,5 57:1,12 57:15,20 58:14 58:18 59:19,20 59:21 60:1,3,9 60:13,15 61:14 61:21,24 62:1,7 62:12,14,25 63:23 64:4,4,6,7</p>	<p>64:12 65:15,18 66:9,24 67:2,25 68:8,12,19,22,23 69:12,14 71:18 72:10,12,16,22 72:23 73:13,15 73:19 74:5,6,21 74:21 75:14 76:4 77:7,21,21 79:13,18 80:14 80:24 82:5 83:1 83:3 84:18,22 85:8 87:18 88:16,17 89:4,9 89:10,21 90:1 91:5,12,23 92:20,21 93:1,2 93:3,8,13,17,18 93:19,20 94:1,6 94:10 95:2 96:4 99:6,8,10,10,11 99:14,23,25 104:1,10 105:8 105:10,12,12,13 105:21,22 106:3 109:12,14,21 110:3,9,12,17,25 110:25 111:24 112:2,4,6,9 114:6 115:11,12 115:14,18,21,21 115:23 117:6,8 118:5 119:1,9 119:12 121:3 123:15,18,19,21 123:22 124:3,15 124:18,23,23 126:2 <b>knowledge</b> 23:18 23:24 29:11 30:19 35:16 40:9,12,14,19 41:24,24 74:10 74:13 76:9 82:20 123:23</p>	<p><b>known</b> 8:5 18:6,7 54:21 <b>knows</b> 11:5,10 112:11</p> <hr/> <p style="text-align: center;"><b>L</b></p> <hr/> <p><b>L</b> 1:8 129:6,19 <b>language</b> 71:9 120:11,18 <b>large</b> 5:3 16:21 104:18 130:6 <b>latest</b> 70:2,24 <b>law</b> 26:19 60:11 73:16 100:3 <b>laws</b> 47:19 105:22 <b>lawsuit</b> 5:20 8:6 17:14 36:25 <b>lawyer</b> 7:5 124:20 <b>lay</b> 102:23,25 <b>lead</b> 28:9 106:1 <b>leader</b> 104:6 105:3 <b>leaders</b> 102:24 106:8 <b>leadership</b> 76:2,4 76:6,14 <b>leave</b> 16:14 <b>leaving</b> 98:20 101:19 <b>left</b> 104:2 106:15 107:18 <b>legal</b> 19:15,23 24:16,20 99:25 104:9 120:13,14 120:14,16 122:2 122:9,11 123:13 123:24 124:6 <b>legally</b> 48:4 104:14 <b>legislation</b> 23:15 58:10,12 62:9 <b>legislative</b> 56:23 57:6 61:18,21 62:4 82:19 <b>lesbian</b> 60:20 87:7</p>	<p>87:9 <b>Leslie</b> 3:12 53:5 <b>let's</b> 9:8 19:12 33:4 37:14 59:3 69:25 75:7 85:25 86:16,20 95:12 <b>letters</b> 45:16 <b>LGBT</b> 8:9 14:8,11 18:20 52:2 59:24 115:17 <b>LGBT-related</b> 14:15 <b>LGBTQ</b> 79:6 <b>LGBTQA</b> 81:1 <b>LIBERTY</b> 2:2 <b>licensed</b> 31:9 33:22 35:25 103:6,8,21 104:12 105:18 117:8,22 <b>licensures</b> 12:25 <b>life</b> 110:4 115:13 <b>light</b> 125:9 <b>likelihood</b> 110:6 110:21 111:4,7 <b>limited</b> 15:17 106:21 112:19 <b>limits</b> 105:11 <b>line</b> 86:20,21,23 90:24 115:2 <b>lines</b> 91:10 <b>link</b> 70:9 91:5 116:25 <b>listed</b> 87:24 121:11 <b>little</b> 34:11 78:12 84:12 108:12 111:13 127:9 <b>live</b> 115:20 <b>lives</b> 30:17 111:2 <b>living</b> 13:11 <b>LLP</b> 2:7 <b>LMFT</b> 1:8,9 <b>lobby</b> 77:1</p>	<p><b>local</b> 21:1 <b>log</b> 66:19 90:2 <b>logged</b> 46:9 48:20 48:23 <b>logs</b> 46:12,16 <b>loneliness</b> 110:14 <b>long</b> 12:8 13:25 18:6 74:23 <b>longest</b> 94:19 95:7 95:11 <b>look</b> 11:18 17:19 18:17 41:9 50:15 52:21 54:20 61:15 74:21 75:7 84:6 87:16 93:2 96:1 96:23 97:3,23 99:23 102:10 104:7,25 106:14 108:6 112:12 113:23,24 114:7 114:7,19 115:1 115:23 117:24 <b>looked</b> 91:20 100:19 116:21 117:13 118:3 120:23 <b>looking</b> 24:22 42:13,14 67:22 74:11 77:18 90:25 91:2 102:2 116:11 120:21 <b>looks</b> 65:2 106:6 <b>looping</b> 68:11 <b>lose</b> 71:12,19 <b>lost</b> 22:19 <b>lot</b> 20:12 34:10 74:21 81:25 91:4 <b>lots</b> 117:20 <b>loud</b> 6:8,11 52:6 <b>love</b> 23:6 <b>lower</b> 102:15 <b>lunch</b> 83:24 84:2</p>
--	--	---	---	--

94:16 <b>Lynn</b> 130:5,21	<b>married</b> 84:23 <b>material</b> 89:1 <b>materials</b> 73:22 74:11 95:7 <b>matter</b> 46:1 49:15 89:13 106:9 109:23 123:5,8 123:17,20 125:13 127:17 127:22 <b>mayor</b> 17:10 25:20 26:15,16 75:20 80:25 105:23 <b>mayor's</b> 17:5 <b>mayoral</b> 17:8 <b>mayors</b> 80:16 <b>mean</b> 8:1 9:5,12 11:24 22:15 28:12,13,22 29:6 30:2,12 34:3 36:11 38:5 38:7 39:20 45:18 46:25 52:16 55:23 57:1,23 58:23 59:22,24 61:24 62:5,6 63:21 65:20 68:25 72:13 76:6 81:24 83:2,9 87:19 88:15 91:4,10,11 93:2 95:10 96:21 99:4,7,25 100:2 100:2 103:12 104:7 109:1,21 109:24 112:5 113:22 114:7 115:18 117:11 118:25 119:11 120:1,7 121:17 122:4 <b>meaning</b> 77:5 96:24	<b>means</b> 8:10,13 28:18 47:23 98:9 <b>meant</b> 36:18 88:1 <b>media</b> 69:13,13 83:2 <b>medical</b> 102:20 119:4 <b>medication</b> 9:15 <b>meet</b> 12:3,8,11 48:25 66:12 72:17,19 122:2 <b>meeting</b> 47:21,22 48:1,1,20 57:24 66:1,10 70:19 70:20 72:7,14 72:21,22,25 77:9 122:11,13 123:6,8,12,24 124:7,16 125:14 125:19 126:15 <b>meetings</b> 43:6,9 43:22 45:11,19 48:3,6,8,10,18 48:19 49:12,19 49:23,23 57:1 74:22 75:16 76:24 77:12,16 85:12 101:15 109:11 122:8 123:16 <b>meets</b> 123:25 <b>member</b> 9:14 13:9 16:8,11,13 16:22 27:10 34:3 44:6,11,23 45:12,21,25,25 46:25 47:10,12 47:24 48:11 52:15 55:13 56:2,3 57:7 77:9 88:23 89:13 93:11 104:5 105:16 122:11 <b>members</b> 1:11	16:15 23:20 25:8 44:13 45:6 46:2 47:18 50:17 55:19 74:25 79:5 88:16 89:5,22 91:23 93:7,19 93:23 102:7 122:1,1,2,9,9 123:17,25 124:1 124:5 <b>membership</b> 13:14 <b>memories</b> 59:10 <b>men</b> 22:8 30:10 33:7,8 35:19,24 84:14,19 85:2 <b>mental</b> 15:2 28:9 28:13,25 30:12 87:10,10,10 93:24 94:3,4 102:23 <b>mentally</b> 31:13 <b>mention</b> 16:9 <b>mentioned</b> 32:7 117:16 118:17 <b>mentioning</b> 90:19 <b>message</b> 67:16,25 68:14 69:25 70:1 73:4 75:7 99:18 <b>messages</b> 46:9 47:2 <b>met</b> 5:18 21:20 48:24 66:4,14 70:12,15 73:2 123:22 <b>methodologically</b> 112:19 <b>methods</b> 102:19 <b>Metropolitan</b> 15:25 <b>Miami</b> 27:23 <b>mid</b> 59:13 <b>MIDDLE</b> 1:1	<b>MIHET</b> 2:5 84:1 <b>mind</b> 28:21 29:24 30:1 31:15,20 31:24 32:3 38:12 39:15 83:1 <b>mine</b> 17:18 <b>minor</b> 40:8 105:17 110:22 111:16,21 <b>minors</b> 27:7 28:4 28:5,20 29:12 39:19 52:5 53:15 56:20 79:10 115:5 116:15 120:6 <b>minutes</b> 43:24 56:8 71:1 83:11 127:11,11 <b>MM</b> 16:3 <b>modified</b> 61:1 <b>moment</b> 5:19 63:2 103:14 114:14 128:7 <b>Montblanc</b> 13:7 <b>months</b> 110:2 <b>morning</b> 5:18 <b>mother</b> 22:8 24:3 99:15 <b>mother's</b> 20:11 <b>motion</b> 17:22 19:8 19:12,14,14 24:15,20 25:5 25:22 26:2 27:14,16,17 71:1 74:2 88:12 121:19 125:23 <b>mouth</b> 23:23 <b>move</b> 25:7,17 26:4 31:20 53:24 56:11 71:4,10 72:1 107:13 128:5,12 <b>moved</b> 75:18 88:14 98:23
-------------------------------	---	---	---	--

<b>moves</b> 71:2 80:5	1:16 52:22	<b>Notary</b> 5:2 129:20	<b>office</b> 15:4 40:22	127:13,21 128:4
<b>moving</b> 45:9 81:3	<b>neighborhoods</b>	130:5,21	41:11 46:13	<b>old</b> 20:19
106:13 108:12	115:12	<b>note</b> 97:23	49:23 61:22	<b>older</b> 29:14
122:5	<b>networks</b> 102:25	<b>notes</b> 72:23	64:7,11 65:21	<b>once</b> 49:9 69:10
<b>MPO</b> 15:25 16:12	<b>never</b> 21:20 22:1	<b>notice</b> 3:5 5:5	65:22 76:15	88:14,14 109:20
16:24	22:2,3 23:4,4,10	9:23 10:4 11:16	<b>officer</b> 16:20	110:9,17 112:1
<b>Mueller</b> 122:14	23:12 30:3,6	47:25 60:24	106:3	<b>one's</b> 54:23
122:25 123:2,9	33:24 34:22,23	86:8	<b>official</b> 1:15 44:3	<b>one-on-one</b> 21:9
123:16 124:8	44:18,19 47:4	<b>noticed</b> 48:10	49:20 82:23	28:24 29:19
126:16	60:13,17,17,22	<b>notion</b> 69:8	89:13 129:10	31:12 38:22
<b>Mueller's</b> 122:15	64:3,4 66:4,4,13	<b>November</b> 129:11	<b>officials</b> 115:22	<b>ones</b> 55:10 63:23
<b>multiple</b> 117:6,7	73:2,18 82:12	130:14	<b>oh</b> 14:21 43:17	<b>open</b> 16:18 49:22
<b>municipalities</b>	93:19 102:8	<b>numb</b> 28:15	67:20 68:6	<b>opened</b> 56:5
24:23 42:14	111:18	<b>number</b> 27:1 50:5	70:21 72:1	<b>opening</b> 52:1
45:9 98:22	<b>new</b> 1:10 15:5	54:5 65:21,22	<b>okay</b> 6:1,5,12,19	<b>opinion</b> 104:15
106:11 120:21	92:8,13 93:14	104:22 110:24	6:25 7:3,10,12	114:6 117:5,12
123:10 125:14	<b>newer</b> 114:5	111:19	7:20 8:2,15 9:1	119:11 125:3,6
<b>murder</b> 104:11	118:24	<b>numbered</b> 10:8	10:14,18,24	<b>opinions</b> 112:6
	<b>newest</b> 93:3,3	<b>numbers</b> 86:18	11:13 14:6	<b>opportunity</b>
<b>N</b>	<b>news</b> 22:21 23:25		15:23 16:2,23	25:10 96:1,23
<b>Nadine</b> 3:23 4:4	24:5,6 69:14	<b>O</b>	17:12 18:24	<b>oppose</b> 46:7
57:13,13 62:12	78:21 93:3,4	<b>o'clock</b> 1:25	19:14 26:6,16	<b>opposed</b> 101:23
62:12 65:3,9,12	104:18,24 106:1	128:13	27:20 31:1 33:8	104:11
65:17 66:3,4	<b>newspaper</b> 31:25	<b>OATH</b> 129:1	34:8 35:3,21	<b>opposing</b> 69:12
67:13,18 68:4	38:13 58:1 60:2	<b>object</b> 124:24	36:13 37:5,11	<b>opposite</b> 104:9
<b>Nadine@eqfl.org</b>	69:10 83:1	127:6	37:21 39:1	<b>opposition</b> 45:18
3:18 56:19	<b>nine</b> 106:14	<b>objection</b> 7:5,8	44:21 46:5 47:5	45:21 69:11
57:12	<b>nine-fifty-seven</b>	124:14 126:24	47:14 49:2,25	<b>order</b> 24:23 59:4
<b>name</b> 9:8 17:24	81:5	<b>obligated</b> 124:19	51:22,25 52:9	61:1 92:6 119:8
17:24 52:1	<b>ninety-nine</b> 52:12	125:5	52:17 53:21	120:22
60:17,17 84:21	<b>nod</b> 6:10	<b>obtain</b> 46:21	56:7 61:15 64:6	<b>ordinance</b> 8:4,5
122:14	<b>non-aversive</b> 36:4	<b>occasion</b> 70:20	67:21,24 68:2,6	8:24 14:7,10,17
<b>named</b> 61:9	38:24 39:8,14	81:21	68:14 73:17	17:13 19:1,16
<b>narrowed</b> 34:7	96:7 98:14,20	<b>occur</b> 15:9 108:17	74:18 78:11	20:4 25:6 26:3
<b>National</b> 60:20	100:17,24 113:3	109:3,18 112:9	80:20 81:9,14	26:18 29:13
<b>nature</b> 42:16	116:1,9	114:16 125:19	85:14 86:17,22	30:18 31:21
<b>nausea</b> 37:24	<b>non-LGBTQ</b> 80:5	<b>occurred</b> 66:10	87:3 90:5,7,25	32:5 35:21 37:3
<b>NCLR</b> 60:20 61:2	<b>nonaversive</b>	75:24	91:20,25 95:12	37:12,19 38:14
<b>necessarily</b> 11:10	112:17	<b>occurring</b> 30:20	96:1,6 97:2,23	39:15 40:5,10
<b>need</b> 7:16 39:25	<b>nonverbal</b> 6:10	42:20	98:25 102:12	41:3,25 42:18
58:2 61:25	<b>normal</b> 6:9 30:10	<b>October</b> 1:23 59:5	105:18,19	43:6 44:23 45:5
63:22 72:4	48:8	<b>Off-the-record</b>	107:13,15	45:6,22 47:6,24
<b>needed</b> 69:9	<b>normally</b> 50:15	84:3	111:20 120:16	48:17 49:5,7,15
<b>negative</b> 110:21	<b>North</b> 1:23 5:3	<b>offenses</b> 105:6	121:8 122:23	49:21 50:23
<b>neighborhood</b>	<b>Northeast</b> 104:19	<b>offer</b> 82:8	126:13 127:12	53:9 54:10 55:2

55:14 57:18	14:8,11,15	102:10 106:14	24:8,16 30:23	110:25 111:17
58:21 59:17	18:20 45:14	107:14 112:12	31:2 44:12 57:9	111:25 112:2,6
60:8,21 61:2,5	61:5 103:25	115:2 118:3	69:4 77:2 87:23	115:13,19 119:7
61:10,13 62:10	117:9	121:8	124:7	119:12
62:22 64:2 66:7	<b>organizing</b> 74:12	<b>pages</b> 69:25 86:10	<b>partner</b> 115:16	<b>perceive</b> 107:24
66:11 69:6,9	77:20 82:25	87:20 91:16	<b>pass</b> 45:15,15	108:2,23
70:14,17,20,22	<b>orientation</b> 4:17	119:11	79:9 105:11	<b>percent</b> 52:13
71:1,4,25 72:2	8:16,19,25	<b>pain</b> 28:16	<b>pass-the-word</b>	110:22,22,23
73:24 74:19	29:17 32:11	<b>Palm</b> 61:9 129:4	62:1	<b>perform</b> 104:13
75:20,22 76:19	33:2 36:4 38:21	130:3	<b>passage</b> 14:6 60:7	<b>performed</b> 29:12
77:3,10,15 82:3	43:11 54:24	<b>Paoloemilio</b> 70:7	71:25 74:18	97:25 103:6,7
82:5,11,24 83:8	87:6 94:23	<b>paper</b> 90:8 95:14	76:19 82:23	103:21,21
83:16 85:4,17	100:7 102:18,22	107:16	85:17 92:7	<b>performs</b> 105:17
86:5,11,12,13,16	103:20 106:21	<b>papers</b> 87:24 88:9	<b>passed</b> 14:10	<b>period</b> 35:4 42:19
87:16 88:6,10	107:5 116:16,20	88:25 89:8,15	26:18 69:9	44:6 50:22 53:9
88:13,15 89:6	117:1,3 119:17	89:24 90:19	70:17 71:1,6	54:10 58:24
89:16,18 90:6	<b>original</b> 74:1,1	91:1,15 92:3,10	75:22 77:16	93:5 101:14
90:20 92:4,8,11	80:13 121:4	92:14 93:10	82:11 83:16	122:6,8
92:15,16,18	<b>originally</b> 32:4	95:8 114:10	105:12 113:20	<b>periods</b> 45:4
93:6,13 94:2,8	79:17	119:14 127:24	114:8	<b>person</b> 21:23
94:17,19 95:13	<b>originator</b> 17:13	<b>paragraph</b> 27:8	<b>passes</b> 71:13	30:17 33:25
96:3 98:16	<b>Orlando</b> 2:3	27:20 54:20	<b>passing</b> 58:3	34:15,20 80:5
101:13 102:2	<b>outcome</b> 110:21	58:2 71:11 72:4	98:16,19 115:9	90:3 94:6 99:16
103:10 104:1	<b>OUTREACH</b>	79:8 84:13	<b>paths</b> 28:10	103:22 104:14
105:11,16,22	1:10	95:11 106:16,20	<b>patients</b> 1:8,9	109:14
107:10 113:23	<b>outside</b> 13:13	108:13 116:12	<b>PDF</b> 95:25 119:25	<b>person's</b> 99:14
114:4,10,19,21	24:13 48:6 77:9	117:7 118:8	<b>Pediatrics</b> 90:10	102:21
115:1,9 116:23	<b>overall</b> 117:11	121:8,13,22	<b>pending</b> 5:8	<b>person-by-person</b>
117:6 118:12,19	<b>overlap</b> 10:15	<b>paragraphs</b> 87:17	<b>people</b> 15:6 20:9	108:25
118:22,24	<b>overview</b> 125:16	94:20 112:13	20:17 21:1,3	<b>personal</b> 43:25
119:10,15 120:2	<b>overwhelming</b>	<b>paralysis</b> 37:24	28:10 32:17	47:15 63:11,18
120:11,17 121:1	87:1,5,14 88:2	<b>parent</b> 39:24	39:23 43:23,24	65:22 109:12
121:4,11,22,25	92:2	<b>parents</b> 28:14	44:5 45:17,17	<b>personally</b> 18:24
122:3,18 124:9	<b>P</b>	31:7,10 32:9,10	46:17,17 49:10	24:8 45:20
126:5,8 127:19	<b>p.m</b> 1:25 128:13	33:1,10 39:24	52:18 57:24	61:12 88:8 89:7
128:3	<b>page</b> 3:1,4 10:8	<b>park</b> 77:20	66:12 69:2,11	89:25 90:5
<b>ordinances</b>	64:20 67:8,17	<b>part</b> 33:25 34:9	69:13 70:11	129:7
120:18 121:5	67:23 68:7,15	43:5 44:2 49:19	71:21 72:20	<b>persons</b> 20:23
<b>ordinary</b> 59:19	70:2,25 73:5	52:2 58:9 76:3,6	73:1 74:7,12,21	87:8 120:14
61:25	75:8 78:7,10	76:18,18 77:14	76:20 77:21	<b>perspective</b> 17:20
<b>organization</b> 16:1	86:16,18 89:2	77:15,21 103:8	80:16 81:25	<b>Petersburg</b> 80:25
34:1,10 44:15	90:6,12,13,13,21	105:10 113:5	82:25 83:3,9	<b>phase</b> 40:1
54:15 59:16	91:1,13 92:1	114:21 125:18	103:8 105:1	<b>phone</b> 47:1 49:23
103:9 105:9	94:18 97:3,5,24	127:8	107:24 108:2,23	66:5,15,18,20
<b>organizations</b>		<b>particular</b> 11:5	109:3,11 110:10	<b>phrase</b> 71:19

<p><b>physical</b> 30:6 115:4 116:13 120:5 <b>Physicians</b> 117:10 <b>picked</b> 80:21 <b>PICKUP</b> 1:9 <b>picture</b> 78:7 <b>piece</b> 58:11 92:20 125:11,11 <b>place</b> 1:23 126:2 <b>places</b> 19:18 120:24 <b>Plaintiffs</b> 1:12,20 2:4 5:7 <b>Plaintiffs'</b> 3:4,5,7 3:9,11,14,16,19 3:21 4:2,5,8,11 4:14 5:19 10:1,3 10:3 26:23 50:1 50:4 52:24 53:2 53:25 54:2 56:14 62:15,17 64:13,15,24 67:3,5,9,13 69:18,20 75:1 77:23 86:4 95:16 <b>planning</b> 15:25 16:24 83:24 <b>played</b> 76:19 <b>please</b> 5:10 6:22 9:5,9 46:7,7 68:16 112:13 <b>PO</b> 2:2,8 <b>point</b> 6:19 7:6 43:22 57:25 60:2 71:8,14,23 74:9 79:19 81:14 82:1 101:7,15,18,22 106:5 114:9 119:22 <b>points</b> 40:13 113:24 118:24 <b>police</b> 106:3</p>	<p><b>policies</b> 79:6 <b>policy</b> 16:10 17:6 63:10,16,16,20 68:12 <b>polite</b> 52:20 <b>political</b> 18:2,3 79:5 <b>Pollitzer</b> 4:4 67:18 68:3,8 <b>population</b> 32:19 <b>portion</b> 78:9 85:3 126:25 <b>pose</b> 87:6 <b>position</b> 9:12 13:9 16:4,12 18:4 56:24 76:18 88:5 100:5 104:3 105:15 108:19 110:14 110:17 115:24 116:6 122:15 <b>positions</b> 15:20 16:20 17:1,5 <b>possibilities</b> 100:15 <b>possible</b> 25:7 66:17 72:5 111:9,12 124:9 <b>post</b> 32:18 <b>Poverty</b> 60:11 73:16 <b>pow</b> 72:5,10,12,17 <b>practice</b> 28:3 29:14 52:14 53:16 99:24 104:3,5 106:6 106:13 123:24 <b>practices</b> 21:3 28:19 31:15,19 31:24 32:3 54:22 97:13 <b>practitioners</b> 90:15 <b>precede</b> 87:23 <b>preceding</b> 73:4</p>	<p><b>preliminarily</b> 124:17 <b>preliminary</b> 26:7 <b>preparation</b> 72:6 <b>prepare</b> 11:13,19 11:21 12:4,11 26:2 <b>prepared</b> 19:22 27:17 42:6 126:5 127:19 <b>preparing</b> 24:18 <b>presence</b> 99:14 <b>present</b> 43:5 44:13 93:7 <b>presented</b> 24:7 <b>pressure</b> 97:16 <b>prestigious</b> 81:11 <b>Pretty</b> 18:18 <b>prevent</b> 9:20 <b>prevented</b> 91:9 <b>previous</b> 115:16 120:6 <b>previously</b> 118:4 <b>primary</b> 22:19 92:21 <b>print</b> 97:7 <b>printout</b> 26:25 <b>prior</b> 14:6 19:8,9 22:10 36:14 40:5 54:17 59:13 63:2 69:15 82:3 85:7 <b>privacy</b> 34:24 <b>private</b> 18:5 48:12,16 <b>privately</b> 47:20 <b>privilege</b> 122:22 123:1 124:17 125:5 127:7 <b>privileged</b> 126:16 126:18 <b>pro</b> 79:6 <b>probably</b> 7:6 83:13 94:10 95:7 103:13</p>	<p>127:11 <b>problem</b> 6:23 <b>procedure</b> 7:7 <b>proceedings</b> 6:2 128:13 <b>process</b> 25:2,22 26:17 42:18 44:10 71:3 125:18,19 127:4 <b>produced</b> 27:1 50:5 53:3 54:5 56:16 64:16 67:6 69:21 75:4 78:4 <b>PRODUCTION</b> 27:2 50:5 53:3 54:6 56:17 64:17 67:6 69:21 75:4 78:4 84:8 <b>professional</b> 12:25 13:4 31:9 103:21 105:18 <b>professionals</b> 102:23,24 103:7 104:13 117:8 <b>prohibiting</b> 63:17 <b>Project</b> 62:25 64:1,5,10 <b>promise</b> 82:8 <b>proposal</b> 82:2,3 <b>propose</b> 58:10 92:23 <b>proposed</b> 19:19 23:14 29:13 30:18 31:20 32:4 35:21 41:25 49:16 58:13 59:18 62:11 64:12 76:7 79:17 93:6 102:1 113:21 <b>proposing</b> 24:21 42:18 99:5 <b>prosecuted</b> 105:3</p>	<p><b>prosecutions</b> 104:18 <b>protect</b> 115:23 <b>protecting</b> 115:4 116:13,14 120:5 <b>protest</b> 77:20 <b>provide</b> 36:6 83:7 83:15 107:22 108:20 109:7,8 <b>provided</b> 73:22 74:2 <b>providers</b> 73:13 74:4 <b>providing</b> 37:25 <b>Psychiatric</b> 37:16 117:9 <b>psychiatrist</b> 109:22 <b>psychoanalytic</b> 102:20 <b>psychological</b> 4:15 37:17 39:17 54:23 94:21 115:5 116:13 120:5 <b>psychologically</b> 30:16 <b>psychologists</b> 109:22 <b>public</b> 5:3 25:10 42:25 43:1,19 43:23 44:6 45:4 45:18 46:1,22 47:21,21,25 48:1,3,24 49:9 68:12 74:23 76:21,23 77:4,5 77:9,12,16 83:4 84:20 85:3,12 85:23 92:20 93:16,18 109:11 111:10,10 112:6 115:10 121:2 123:20 129:20 130:5,21</p>
--	---	---	---	---

<b>public's</b> 92:17	29:10 39:2	72:2 93:13	<b>recitals</b> 87:23	88:19 92:2,3
<b>publicly</b> 48:9 49:8	86:15 128:11	120:1 126:2	90:18 107:9	<b>refers</b> 94:21,25
49:17 77:12	<b>quite</b> 87:17	<b>reads</b> 27:6,8	<b>recited</b> 116:23	<b>reflect</b> 102:5
<b>published</b> 113:16	113:24	54:20 65:7	118:12 127:24	<b>reflected</b> 109:13
<b>pull</b> 85:13	<b>quote</b> 27:20,24	71:12 73:11	<b>recognition</b> 79:12	<b>refresh</b> 51:2
<b>punishment</b> 37:7	28:18 31:25	75:11 78:13	<b>recognize</b> 62:23	54:25 65:24
38:8 39:5,18,19		90:14 107:21	70:10 78:22	<b>regarding</b> 5:21
40:2,4 96:12	<b>R</b>	108:16 115:3	79:4 86:5,13	10:9,22 33:2
<b>punitive</b> 38:4	<b>R</b> 130:1	<b>ready</b> 128:4,11	95:22	35:18 44:7
<b>purpose</b> 5:6 70:19	<b>race</b> 92:21	<b>really</b> 29:6 57:2	<b>recognized</b>	48:17 49:5,7
<b>purposes</b> 6:15	<b>Rachele</b> 5:2 129:6	58:2 62:7 76:23	115:17	60:23 61:2,10
<b>pursuant</b> 5:5 9:23	129:19 130:5,21	93:21 125:22	<b>recognizes</b> 80:4	62:22 63:10
<b>purview</b> 59:25	<b>Raise</b> 5:9	<b>reason</b> 22:9 51:5	<b>recognizing</b> 80:12	83:20 112:20
104:15	<b>rally</b> 59:20	51:11 52:9 55:4	<b>recollection</b> 51:3	113:8 118:9
<b>Puskarich</b> 4:13	<b>Rand</b> 61:9	66:24 71:23	55:1 65:25	<b>regardless</b> 41:18
70:5,12 78:17	<b>range</b> 90:18,25	98:25	<b>reconsider</b> 92:17	99:24 102:22
78:19,20 79:14	<b>re-election</b> 15:13	<b>recall</b> 9:16,21	<b>record</b> 6:15,17	103:20 106:7
80:1 81:22	15:15	19:7 21:2 33:3	7:8 8:15 9:9	<b>registry</b> 115:16
<b>put</b> 23:23 31:7	<b>reaching</b> 58:14	47:5 53:17,21	37:15 44:3	<b>regular</b> 16:22
32:9 33:1,10,12	59:16 65:7	59:14 84:11	49:20 50:4 53:2	48:10
39:19,23 57:24	<b>react</b> 110:19	91:2 96:8,16	85:12,23 86:9	<b>rejection</b> 22:24
59:21 65:21	111:1	<b>receive</b> 12:19	90:3 101:6	54:22 111:7,15
91:15 110:1	<b>read</b> 22:14 23:25	34:25 42:17,20	109:13 123:20	<b>related</b> 15:2 23:15
<b>putting</b> 60:1	28:7 30:23 47:6	43:3,10,14	127:5	32:11 36:24
<b>Q</b>	47:10,10,18,18	45:12,20 46:16	<b>records</b> 46:22	45:4 104:19
<b>quality</b> 90:14	51:20 54:25	51:6,11 81:17	<b>Redevelopment</b>	<b>relating</b> 14:16
115:13	55:21 56:2,5	88:8,11,23 89:1	16:16,25	45:6
<b>quality-of-life</b>	58:4,17 65:9,24	<b>received</b> 20:10	<b>redundant</b> 35:23	<b>relation</b> 38:20
115:14	68:25 72:8,9	21:3,18 23:3,7	<b>Reed</b> 3:12 53:5	<b>relationship</b> 22:5
<b>question</b> 6:5,21	78:25 80:7	34:14 35:8 40:7	<b>refer</b> 8:17,22,23	23:11 124:25
7:2,9,17 9:4	84:15 87:3,12	40:25 51:19,20	87:15 95:1	125:4
11:8 63:15	89:4,5,8,22 90:3	89:14,17	<b>reference</b> 113:24	<b>relative</b> 130:11
69:24 83:12,21	91:25 93:11	<b>receives</b> 110:22	118:24	<b>relied</b> 90:19
100:14 103:13	96:4 103:2	<b>receiving</b> 21:12	<b>referenced</b> 87:20	<b>Religion</b> 104:2
110:5 111:12,14	106:20 107:1	42:1 55:12	88:9,22,25 90:8	<b>religious</b> 34:1,9
111:20 112:8	108:4,10,23	111:22	118:7 119:24	102:20,24,24
114:22 116:6,19	112:22,23 113:3	<b>Recess</b> 56:9 86:1	<b>references</b> 87:17	103:9,22,25
121:6 124:19,24	113:5,10 116:17	94:12 114:23	<b>referencing</b> 117:5	105:9
125:1,1,3,6	126:23,25	128:9	<b>referred</b> 73:19	<b>rely</b> 118:10
126:23 127:2	<b>reading</b> 25:6,12	<b>recipient</b> 53:4	75:14 76:5	120:18 127:23
<b>questioning</b> 23:5	25:16,18,19	<b>recital</b> 86:24	<b>referring</b> 11:9	<b>relying</b> 117:1
87:8,9 122:21	26:9,13 30:21	87:15,22,23	37:6,18 38:25	<b>remember</b> 24:19
<b>questions</b> 7:7,20	36:19,22,24	90:9,13 92:1	71:18 72:11	36:21,22 37:4
11:15,20 24:16	37:2 50:12 52:6	94:20 115:3	73:15 74:6	45:23 51:23
	57:23 71:2,4,10	116:11 121:12	76:14 79:2,16	52:7 53:19

54:14 55:3,12 55:15,25 58:22 66:17 81:18,20 84:20,21 85:5,6 85:8,18 89:10 91:5 125:22,25 <b>remind</b> 6:14,18 6:18 <b>remission</b> 109:24 <b>reparative</b> 54:21 <b>rephrase</b> 127:1 <b>report</b> 4:15 19:17 19:20,22 24:18 24:21 25:3,9,24 27:17,19 37:11 37:18 41:4,16 42:6 47:2 74:1 87:18 94:2,25 95:1,6,13,21,22 96:2 97:4 102:11,17 103:5 106:15,22 107:4 107:11,14 113:23 114:3,12 116:22 117:19 117:23 118:11 118:15,18 119:4 119:5,9,15 120:21 122:7 125:24,25 130:8 <b>reporter</b> 5:9 51:9 51:10 126:25 <b>reports</b> 104:18 107:8 116:22,23 <b>represent</b> 55:10 <b>representative</b> 11:3 92:25 <b>representing</b> 9:14 64:11 <b>reprimand</b> 37:7 39:5 96:12 <b>reprimanding</b> 38:4 <b>request</b> 27:10 41:4,8,11 42:7	42:13,16 46:22 86:8 122:7 125:20 <b>requested</b> 41:16 45:8 98:21 120:13 123:12 126:25 <b>requests</b> 48:19 <b>required</b> 126:17 <b>research</b> 87:1,5 87:14 88:2,5 89:5 90:14 91:11 92:2,8,9 93:15 94:17 108:8 112:20 119:13 122:19 <b>researched</b> 125:17 <b>resident</b> 18:8 <b>residential</b> 35:4 <b>resources</b> 73:11 73:19 <b>respect</b> 23:4 63:16 99:12 <b>respectful</b> 34:23 <b>respond</b> 52:12,19 52:22 53:23 <b>responded</b> 52:10 53:22 55:5 62:13 <b>response</b> 65:3 67:12 <b>responses</b> 4:16 6:10 94:22 <b>responsibilities</b> 15:21 58:9 <b>responsibility</b> 92:16 <b>result</b> 42:20 55:7 110:15 111:8,15 111:22 112:10 114:16 <b>resulting</b> 43:10 <b>retail</b> 13:5,5,18 <b>review</b> 11:13	73:22 82:18 106:21 <b>rezoning</b> 52:17 93:12 124:2 <b>Rgannam@lc.org</b> 2:6 <b>right</b> 5:9 7:23 9:8 9:19 12:10 14:21,24,24 15:19 18:16 19:6 25:25 42:4 43:20 56:11,16 62:17 64:15 66:16 81:3,8 85:25 86:3 97:9 102:15 108:7 121:14 128:4,10 <b>Rights</b> 60:20 <b>rigorously</b> 112:18 113:4 <b>risks</b> 87:7 <b>River</b> 15:24 16:4 16:23 <b>Rob</b> 10:22 <b>ROBERT</b> 1:8 2:10 <b>robust</b> 95:8 116:22 <b>Roe</b> 104:7 <b>Roger</b> 2:6 5:18 37:15 78:1 83:23 124:18 127:3 <b>role</b> 122:18 <b>rolling</b> 17:22 <b>room</b> 66:23 114:24 <b>rubber</b> 96:14 <b>Ruggiero</b> 1:15 5:20 <b>rules</b> 5:22 <b>running</b> 15:15 <b>Rwilliams@bur...</b> 2:10	<b>S</b> <b>S-O-C-E</b> 8:12 102:18 <b>safety</b> 108:9 115:10,12 <b>Sal</b> 1:15 5:20 <b>sales</b> 13:5,19 <b>same-sex</b> 38:2 102:22 <b>satisfied</b> 83:21 <b>save</b> 127:11 <b>saw</b> 39:17 52:7 55:1 81:25 92:20 93:4 <b>saying</b> 78:17 91:8 109:4 112:3 123:14 <b>says</b> 30:8 51:1 52:1 68:11,16 68:20 71:19 72:4 73:12 76:1 76:17 77:13 78:17 79:9,15 80:1,2,18 81:4,7 84:13 86:25 97:10,13,24 100:3 102:17 104:8,10 112:17 113:3 114:3 116:24 119:23 <b>schedule</b> 27:9 <b>school</b> 12:16 24:4 28:8 30:13 31:4 32:7,10,14,16,18 32:21,23,24,25 35:20 119:3 <b>scientifically</b> 108:8 <b>scratch</b> 120:17 <b>seal</b> 129:10 <b>second</b> 25:18,19 26:2,12 27:8 29:19 34:18 35:7 67:8 72:4 74:3 75:19	78:10 84:13 90:9 106:16 <b>secretary</b> 56:25 123:14 <b>section</b> 102:13 <b>see</b> 22:20 24:21 33:13 36:20 37:14 42:14 48:24 50:7 56:4 59:19 61:25 64:22 65:4,6 67:8,16 68:5,6,6 68:7,17 69:24 73:8 74:23 76:12 78:15 81:6 85:13 86:20 87:1,17 89:2 90:16,22 94:23 97:11 99:9 102:15,16 105:21 106:17 106:24 107:19 108:14 111:18 112:15 115:6 119:3 120:24 <b>seeing</b> 51:2,23 59:15 60:4 116:23 <b>seeking</b> 57:21 <b>seen</b> 28:22 38:7 44:19 51:3 53:17,19 54:13 55:12 57:9,23 63:2 69:15 71:15 89:18 95:22,24 <b>Sefer</b> 3:15 54:7 <b>self-help</b> 102:25 <b>send</b> 22:4 25:19 26:15 40:3 46:1 46:3 47:2 50:17 68:16,20 69:2 99:18 <b>sender</b> 50:18 <b>sense</b> 8:20 9:4
--	--	--	--	---

37:9 <b>sent</b> 21:6,11 26:16 31:6 34:21 45:16,23 46:5 47:12 50:8,10 50:15 51:1,6,8 51:12,18 52:11 55:10,18 <b>sentence</b> 68:10 71:11 74:3 76:1 79:8 84:13 106:19 107:21 112:14,24 113:2 114:6 117:25 <b>sentences</b> 52:1 53:13 <b>separate</b> 8:18 59:9 106:2 <b>separated</b> 103:24 <b>separately</b> 107:10 <b>serious</b> 116:15,19 117:3 118:9 <b>serve</b> 15:22 62:3 <b>session</b> 92:24 <b>sessions</b> 33:19 <b>set</b> 16:18 54:22 57:1 65:8,18 123:14 <b>seven</b> 50:17 <b>seventeen</b> 100:1 <b>seventy-one</b> 97:3 <b>sex</b> 102:22 <b>sexual</b> 4:16 8:16 8:19,25 29:17 32:11 33:2 36:4 38:21 43:11 54:23 87:5 94:22 100:7 102:17,22 103:19 104:20 105:1 106:21 107:4 116:16,20 116:25 117:3 119:17 <b>shame</b> 54:22	<b>shaming</b> 39:5 <b>share</b> 74:8 83:3 <b>shared</b> 45:5 83:2 <b>she'll</b> 56:25 <b>shock</b> 53:16 <b>shocks</b> 37:25 <b>short</b> 127:8 <b>shortcoming</b> 87:11 <b>show</b> 26:21 <b>showed</b> 69:20 77:11 112:3 <b>showing</b> 49:10 50:3 64:15 67:5 <b>shown</b> 91:12 <b>shows</b> 62:20 71:10 72:22 <b>sic</b> 57:14 <b>side</b> 59:10 <b>sign</b> 75:20 105:23 <b>signature</b> 75:20 <b>signed</b> 46:8 65:14 <b>signs</b> 61:17 <b>similar</b> 23:2 85:23 123:16 <b>simply</b> 41:8 98:9 127:6 <b>Simpson</b> 2:14 10:18 94:13 114:24 <b>sir</b> 5:10 17:11 25:1 85:21 88:3 90:11 123:7 <b>sit</b> 114:17 119:22 <b>six</b> 110:2 <b>sixty</b> 97:23 <b>size</b> 74:22 <b>Skipping</b> 106:19 <b>slash</b> 54:24 73:12 74:4 <b>small</b> 97:7 <b>Smith</b> 3:23 4:4 57:13 62:12 65:3,12 66:3 67:13,18 68:4	<b>smoothly</b> 71:12 <b>snap</b> 37:25 <b>snapping</b> 39:21 96:14 <b>SOCE</b> 8:12 102:18 103:6,7 107:23,25 108:9 108:17,21,24 109:4,8,19 110:7,15,22 111:8,16,22 112:10,18,21 113:1,4,8,14 114:16 118:10 <b>social</b> 69:13 70:21 81:21,21 83:2 102:25 <b>society</b> 30:9 <b>SOLI</b> 1:10 <b>solicit</b> 58:7,9 59:17 <b>solo</b> 72:23 <b>somebody</b> 61:22 100:11 109:23 110:1 <b>someone's</b> 111:1 <b>son</b> 22:1,2 33:14 <b>soon</b> 17:21 <b>sorry</b> 22:13 67:22 68:7 80:6 101:5 <b>sort</b> 46:24 59:9 98:12 124:16 <b>sound</b> 108:8 112:19 <b>source</b> 93:3 117:2 <b>sources</b> 91:7 118:11 <b>South</b> 12:17 <b>Southern</b> 60:11 73:16 <b>speak</b> 6:3,16 11:21 43:23,24 44:15 70:13 74:7 76:20 77:12 82:25	83:10 88:16 93:18 <b>speaking</b> 8:4 25:11 38:13 39:2 77:16 85:18 97:2 <b>specific</b> 21:5 24:11,15 28:19 28:19 30:22 31:8 47:5 51:23 87:18 91:5,5 100:18 <b>specifically</b> 7:11 14:16 21:2 41:16 42:13 45:23 46:14 53:20 54:14 55:25 73:25 85:6 89:10,18 91:2 94:18 101:1,9 102:9 112:7 121:13 127:16 <b>specifics</b> 23:1 29:7 31:5 33:24 34:23 121:1 <b>speculate</b> 68:21 <b>speech</b> 104:1 127:9,10 <b>speed</b> 127:4 <b>spiral</b> 21:16 <b>spiritual</b> 102:21 <b>SPLC</b> 60:16 61:2 73:11,16,19,22 73:23 74:11 <b>spoke</b> 45:17 49:8 64:6 66:24 77:4 77:5 81:22 84:14,19 109:11 112:2 <b>sponsor</b> 17:13 92:15 <b>sponsored</b> 92:25 <b>sponsoring</b> 37:3 <b>spot</b> 97:9	<b>St</b> 80:25 <b>staff</b> 12:1 19:17 19:20,22 24:18 24:21 25:3,9,24 27:16,19 41:4 42:6 74:1 94:1,2 120:21 122:7,10 125:24,25 <b>stand</b> 43:15 <b>stapler</b> 95:18 <b>start</b> 9:8 17:17 34:5 69:23,25 70:1 74:22 75:6 86:16 115:20 120:23 <b>started</b> 5:23 49:10 <b>starting</b> 6:4 10:7 <b>starts</b> 64:19 67:17 73:5 <b>state</b> 5:3,5 22:18 119:15 129:3,20 130:2,5 <b>stated</b> 13:18 107:7 <b>statement</b> 14:19 27:13 74:3 81:12 85:1,11 85:20 87:19 105:5 107:3 109:17,19 110:6 113:12 116:19 117:2,11 118:9 127:8 <b>statements</b> 44:2 45:3 108:18 109:6 <b>STATES</b> 1:1 <b>statewide</b> 22:18 57:15 92:23,25 <b>stating</b> 85:19 <b>stay</b> 30:16 <b>stayed</b> 76:25 <b>stenographically</b> 130:8 <b>step</b> 25:2 26:2,8
---	--	--	--	--

<p>26:12 <b>Steve</b> 30:11 <b>stop</b> 39:25 40:1 52:6 53:17 75:13 <b>stories</b> 20:14,16 20:20,22 21:21 28:7 30:21,23 43:25 74:8 83:4 104:23 106:1 109:12 <b>story</b> 31:1 93:4 104:25 <b>straight</b> 84:15 <b>Stratton</b> 4:3 67:18 68:3,8 <b>Street</b> 1:23 5:4 <b>strict</b> 23:12 <b>strike</b> 42:5 51:17 63:24 82:2 83:20 120:9 <b>string</b> 3:22 4:3,6,9 4:12 64:16 67:6 67:7,17,25 68:14 69:22 70:2,24 73:5 75:5 78:5 <b>strongly</b> 53:14 <b>struggled</b> 23:11 <b>stuck</b> 74:2 <b>studies</b> 87:24 88:9 88:24 89:8,15 90:19 91:1,15 92:3,10,14 93:10 107:19,22 107:23 108:1,20 108:23 109:7 114:9 117:20 118:21 119:14 120:7 127:23 <b>study</b> 88:20 90:8 92:9,13 117:12 117:20 118:21 <b>stuff</b> 63:12 89:20 91:16</p>	<p><b>subject</b> 8:6 11:5 18:11 56:19 123:5,8,17 125:13 127:17 127:21 <b>submit</b> 97:15 <b>subsequently</b> 92:9 <b>suffered</b> 21:22 <b>suicidal</b> 111:22 112:9 <b>suicide</b> 21:14,20 28:6,11,15 110:3 112:1,1 <b>Suite</b> 1:24 5:4 <b>summaries</b> 46:16 <b>summarize</b> 96:10 <b>summary</b> 12:15 13:3 93:8 102:13 108:7 <b>Sunshine</b> 47:19 48:6 <b>support</b> 44:4 45:16,17,21 46:7 53:14 58:3 58:7,10 59:17 62:1 69:6,9 71:13,20,24 74:8 79:11,13 79:15 83:7,15 <b>supporting</b> 114:4 <b>supportive</b> 79:6 <b>sure</b> 7:25 25:21 38:9 51:22 55:15 85:14 100:15 101:6 107:12 128:8 <b>survivors</b> 73:12 74:4 <b>sworn</b> 5:13 15:6 129:8</p> <hr/> <p style="text-align: center;"><b>T</b></p> <hr/> <p><b>T</b> 130:1,1 <b>take</b> 7:16,18 14:14 26:9 30:2</p>	<p>32:8 33:4 36:7 39:14 47:9,17 48:11,18 49:12 56:8 72:22 77:2 83:10 84:2 85:25 86:8 93:15 113:12 125:10 <b>taken</b> 1:20 5:2 25:14 105:15 108:19,25 121:5 <b>talk</b> 12:14 37:19 39:21 44:16 65:9,18,19 66:5 94:17 95:12 96:18 98:15 111:17 115:11 124:5 <b>talked</b> 66:15 84:9 96:6 124:14 <b>talking</b> 7:25 8:15 28:2 37:16 39:9 39:11 40:15 43:15 59:4 68:19 84:11 94:16 95:2 106:1 114:16 <b>talks</b> 37:14 <b>Tallahassee</b> 92:24 <b>Tampa</b> 1:2,11,14 1:15,24 2:8,9,11 2:12 3:8,10,12 3:15 5:4,20 8:1 8:5 9:13 10:5 15:24 16:7,9,24 16:24 17:6 18:8 19:15 20:24,25 24:9,13,22 26:25 27:6,22 29:12 30:20,24 31:3 32:24 35:1 36:1 40:7,15,18 40:23 41:6 42:2 42:12 46:3,5 50:7,10,12 51:1</p>	<p>51:14,18 53:4 54:6,8 55:11,16 56:20 57:4 60:6 60:19 61:17 63:15 78:23 79:10 83:6,14 83:18 105:11,24 110:20 115:3,9 120:4 121:4,10 121:21 122:17 124:21 <b>Tampa's</b> 5:21 121:3 <b>tampagov</b> 63:13 <b>tampagov.net</b> 56:19 63:18 <b>Tampgov.net</b> 63:11 <b>task</b> 4:16 15:20 94:21,25 106:23 106:23 107:10 116:24 <b>Tea</b> 3:15 54:7,7 <b>techniques</b> 102:19 102:20 <b>teen-ager</b> 21:14 22:9 28:7 <b>teen-agers</b> 20:18 <b>telephone</b> 2:3,9 2:13 49:2,6,13 64:7 <b>tell</b> 17:16,16 18:10,13,24 20:2 21:17,23 33:10,18 72:18 72:19 74:16 111:3 <b>telling</b> 127:16 <b>tells</b> 7:11 30:3 <b>template</b> 19:20 24:24 42:15 120:23 <b>ten</b> 113:25 117:12 <b>tend</b> 6:9,16 <b>term</b> 15:4,16,17</p>	<p>29:5,24 38:10 102:17 114:1 <b>terms</b> 7:23 9:3 36:5,9,11,14,18 36:20 96:21 <b>testified</b> 114:14 <b>testifies</b> 5:14 <b>testify</b> 5:13 9:16 9:21 10:9 44:7 60:23 <b>testifying</b> 11:4 40:16 <b>testimony</b> 11:14 11:22 12:11 45:1 61:3 82:20 130:10 <b>thank</b> 46:8 52:19 54:4 81:10,24 <b>thanks</b> 14:22 65:7 81:7 <b>Theater</b> 15:24 <b>Theatre</b> 16:7,24 <b>Therapeutic</b> 4:16 94:22 <b>therapies</b> 21:3 31:19,24 32:3 36:4 38:17,20 39:20 96:7,11 98:20,20 116:2 <b>therapy</b> 5:21 8:5 8:22,24 14:17 18:11 19:1 20:3 20:7,10 21:8,18 22:10 23:2,2,8,9 23:14,24 24:9 24:12,21 27:7 28:4,22 29:4,5,7 29:11 31:12,15 31:17 32:4 34:19 37:3,5,6 38:6,12,24 39:22 40:8,25 41:7,17 42:2,12 42:22 44:8,22 52:4,4 53:15</p>
--	--	---	--	--

54:21,21 56:20	115:2	<b>timeline</b> 125:21	<b>treat</b> 93:20	<b>U</b>
62:22 79:10	<b>thirty-six</b> 86:21	<b>times</b> 3:8 12:3	<b>treatment</b> 34:22	<b>ugly</b> 30:5
84:14 85:2,19	86:23	27:1 118:17	35:8,10 37:24	<b>Uh-huh</b> 15:8
98:24 99:5	<b>thorough</b> 116:23	<b>timing</b> 69:3 92:7	53:16 96:21	22:25 25:13
100:19,20 101:4	119:13	<b>title</b> 80:3	97:15,19,24	27:3 29:22
105:8,17 106:7	<b>thoroughly</b>	<b>titles</b> 16:20	98:4,7 99:7,16	37:13 39:7 40:6
106:10 110:16	117:18	<b>today</b> 6:11,19	99:20,21,22	42:8 50:7,21
115:15 116:1,3	<b>thought</b> 18:13	7:24 9:12,17,21	100:7,9,10	53:6 56:21
116:8,9	80:17 84:5	9:23 10:6 11:14	101:19,19	62:19 64:18,21
<b>thing</b> 34:21 44:14	<b>thoughts</b> 37:8	11:22 12:4,12	103:15,16,22	69:23 70:6,8
58:13 61:6 62:1	38:2 111:22	36:14,18 40:18	<b>treatments</b> 96:19	73:6 75:9 78:6
87:3 90:3 95:19	112:9	54:17 69:15	96:20 97:11,13	86:19 96:13
105:19 106:2	<b>thousand</b> 52:16	71:2 76:10	98:13,14 100:17	104:21
<b>things</b> 22:7,15	<b>threat</b> 98:8 99:11	84:12 96:6	100:17,24,25	<b>ultimate</b> 121:25
28:20 29:25	<b>threats</b> 97:15 98:7	114:2,17 117:13	101:8,16,23,24	<b>ultimately</b> 81:17
30:23 34:10	99:7,17,17	119:22	<b>tremendous</b>	<b>unanimous</b> 72:2
35:24 39:4	<b>three</b> 10:8 14:1,1	<b>today's</b> 6:2	118:25	76:1,24 102:5
95:13 96:15	43:24 83:11	<b>told</b> 21:4,25 22:23	<b>Trevor</b> 62:25 64:1	<b>unanimously</b> 71:1
100:9 115:19	<b>three-quarters</b>	31:23 32:2 33:1	64:5,10	71:6 75:19
<b>think</b> 17:21 19:9	78:13	33:9,21 64:3	<b>trickery</b> 97:16	<b>undersigned</b>
22:9 28:3,17	<b>thrilled</b> 81:11,13	80:10 91:20	<b>tried</b> 34:23 88:17	129:6
29:2 30:15	<b>Thursday</b> 75:17	113:13 115:19	<b>trigger</b> 111:2	<b>understand</b> 6:13
35:22 39:18	78:14	<b>top</b> 67:20 70:1	<b>troops</b> 59:20	6:22 7:13,25 8:7
57:14 58:11,12	<b>Thursdays</b> 75:17	75:7 90:12	<b>true</b> 110:20 130:9	8:10,13 9:5 11:2
59:4,25 60:9	<b>time</b> 1:25 12:5	<b>topics</b> 10:5,8,9	<b>truth</b> 5:13	11:9 25:21
61:24 64:22	20:6 23:17 24:7	117:17	<b>truthfully</b> 9:17,21	35:13 36:3,9
67:8 69:10 74:7	24:11 25:14,19	<b>torture</b> 27:21	<b>try</b> 52:20	37:10,10 38:5
76:7,8,16,20,25	26:10 29:12	28:1,13,21	<b>trying</b> 10:25 62:6	38:10,19 39:1,8
77:11 80:15,24	30:18 35:5,21	29:24 30:1,12	<b>turn</b> 115:2	39:12,12 46:25
80:25 83:21	36:20 41:3,24	31:16,25 38:13	<b>twenty-nine</b> 115:2	68:25 72:13
94:5 95:11 98:4	42:4,19 46:2	39:17	<b>twenty-one</b> 100:1	96:24 101:11
98:23 99:15	48:4 49:16	<b>total</b> 91:18	100:3	116:5 120:10
102:6 103:11	50:22 52:13	<b>touch</b> 58:6	<b>twice</b> 25:17	<b>understanding</b>
104:25 109:1	53:9 54:10 56:5	<b>Tpepin's</b> 78:24	<b>two</b> 7:15 12:7,9	10:6,10 11:6
110:5 115:10,13	58:23,24 60:3	<b>train</b> 84:5	15:17 30:10	17:12 89:6
116:3 117:10	65:8,18 68:1,6	<b>training</b> 15:1	33:3 35:19,24	97:19 99:4,12
118:2,13 120:7	69:8 70:22	93:24 94:3,7	55:24 71:2	102:7 103:4
121:15 125:7	71:23 79:19	<b>transcript</b> 6:2	84:14,18 85:2,5	117:19 120:9,16
128:5	82:1 83:10 93:5	85:13 130:9	85:10 102:10,14	<b>understood</b> 7:3
<b>thinking</b> 19:10	93:15 94:11	<b>transcription</b>	107:7 112:13	10:14 36:13
103:13	102:2 111:17	130:9	114:14	113:2
<b>third</b> 26:8 54:20	113:21 122:6,8	<b>transgender</b> 87:8	<b>two-thirds</b> 68:15	<b>undertake</b> 41:20
58:2 79:8	127:10	87:9 113:25	<b>type</b> 124:22	<b>undertaken</b> 36:17
<b>thirteen</b> 20:21	<b>timeframe</b> 19:11	<b>transition</b> 84:15	<b>types</b> 31:15	<b>unexpected</b> 82:13
<b>thirty</b> 19:9,13	35:17 59:6	<b>travels</b> 69:14		<b>UNITED</b> 1:1

<p><b>University</b> 12:17 <b>unlicensed</b> 33:23 103:22 105:16 <b>Unrelated</b> 44:15 <b>update</b> 70:25 80:3 118:21 124:6 <b>updated</b> 117:14 <b>updates</b> 114:11 <b>urge</b> 53:13 <b>urging</b> 45:14 <b>use</b> 9:3 24:23 29:24 39:18 42:15 54:22 63:10,11,18 97:15 102:17 111:24</p> <hr/> <p style="text-align: center;"><b>V</b></p> <p><b>V</b> 2:10 <b>vague</b> 34:11 <b>valid</b> 107:22 <b>Variance</b> 106:24 107:11 <b>various</b> 38:11 45:4 88:9,24 89:24 91:1 92:3 93:9 95:8 127:23 <b>VAZZO</b> 1:8 <b>vengeance</b> 110:1 <b>venture</b> 13:25 <b>verbal</b> 28:25 29:20 30:6 38:23 <b>verbally</b> 31:13 <b>versa</b> 126:16 <b>versus</b> 96:20 98:14,15 100:17 100:24 104:7 116:1 <b>vice</b> 126:16 <b>victory</b> 75:11,14 <b>view</b> 48:3 79:14 103:14 104:10 <b>vintage</b> 13:8,18</p>	<p>13:25 <b>Voice</b> 78:22 80:14 <b>voluntary</b> 96:20 98:15 99:19 100:7 101:19,23 103:16 <b>volunteer</b> 83:9 <b>vomiting</b> 37:24 96:15 <b>vote</b> 25:7,14,17,17 25:18 26:4,10 26:14 71:4 72:3 75:19 76:1,25 124:4 <b>voted</b> 27:9 43:7 71:9 72:1 120:12 <b>votes</b> 102:6 126:1 <b>voting</b> 71:21 122:5 <b>vs</b> 1:13</p> <hr/> <p style="text-align: center;"><b>W</b></p> <p><b>Wade</b> 104:8 <b>wait</b> 67:20,20 93:16 <b>walked</b> 66:13 <b>want</b> 5:22 6:16 12:14 22:22 23:22 25:21 32:8 33:16 34:8 40:14 54:20 56:25 69:25 83:22 86:15 92:6,22 94:17 96:18 98:15 101:6 102:8 106:14 112:7,12 113:2 114:19,21 115:19 123:15 124:11 125:10 126:12 127:17 128:6 <b>wanted</b> 10:22 24:17 46:21</p>	<p>80:11 84:5 102:9 <b>wants</b> 27:22 39:3 39:4 99:20 <b>wasn't</b> 49:20 61:23 83:13 113:25 114:1 <b>watch</b> 13:8,25 <b>watches</b> 13:8,18 <b>way</b> 6:17 29:3 45:25 55:5 56:1 68:16 75:7 76:24 78:13 83:12 102:6 105:21 118:18 121:18 124:8 125:1 127:5,9 <b>we'll</b> 9:6 37:19 52:21 84:2 94:18 95:19 124:15 <b>we're</b> 6:1 19:10 40:15 59:4 94:14 128:5,11 <b>we've</b> 35:22 55:9 56:7 77:18 100:15 115:14 115:17 <b>web</b> 89:2,18 90:22 <b>website</b> 13:21,22 119:24 <b>week</b> 72:6 <b>weeks</b> 17:21 19:8 64:6 71:2 101:15 <b>welcoming</b> 115:18 <b>wellbeing</b> 115:5 116:14 120:5 <b>went</b> 22:2 23:4,12 31:4,6 35:3 83:3 93:1 98:21 106:12 126:1 <b>weren't</b> 14:14 66:23 <b>whatnot</b> 31:4</p>	<p>72:23 79:7 103:11 <b>whoa</b> 126:11,11 126:11 <b>wife</b> 30:3 <b>Willard</b> 4:7,10 68:11 70:3 73:7 75:10 76:5,13 77:13 <b>Williams</b> 2:10 10:12,16,19,23 10:25 11:24 12:3,10 14:19 34:3,8 37:15 42:24 58:23 59:3 68:21 74:24 78:1 82:15 83:23 122:20,24 124:18 125:21 126:11,14 127:3 127:13 128:8 <b>wind</b> 69:12 <b>wishes</b> 98:2 <b>witness</b> 5:2,15 14:21,24 37:21 44:7,12,18,19,24 67:1 68:23 74:25 122:23 123:3 125:22 126:13,19 129:10 130:10 <b>witnessed</b> 110:3 <b>witnesses</b> 7:15 <b>woman</b> 84:24,25 <b>word</b> 10:13 31:16 31:25 38:13 39:18 50:13 57:25 59:21 60:1 113:25 <b>worded</b> 123:11 <b>wording</b> 91:6 <b>words</b> 18:13 23:23 36:10 96:24</p>	<p><b>work</b> 9:6 63:8 79:9,22 83:10 <b>work-related</b> 63:12,22 <b>worked</b> 13:5,6 <b>works</b> 40:2 61:22 <b>world</b> 114:2 117:9 117:16 <b>wouldn't</b> 31:5 85:11 90:2 99:11 <b>wow</b> 72:5,10,12 72:17 76:1 80:17 <b>wrist</b> 38:1 <b>write</b> 62:5 <b>writes</b> 65:17 <b>writing</b> 52:19 53:13 61:16 <b>written</b> 6:1,17 45:13 62:9 78:9 103:25 <b>wrong</b> 23:23 104:17 109:1 <b>wrote</b> 65:20 78:20 81:6</p> <hr/> <p style="text-align: center;"><b>X</b></p> <hr/> <p style="text-align: center;"><b>Y</b></p> <p><b>yeah</b> 13:21 14:21 14:21,22 20:25 24:4 26:4,20 35:20 36:12 37:10 38:7,16 38:24,25 39:10 43:21 46:7 48:2 50:17 52:16 72:21 74:22,25 76:16 78:2 80:23 84:2 86:23 88:21 90:21,24 91:17 91:19 93:12 95:12 97:7,9</p>
---	---	---	---	---

<p>101:12 104:24 125:16 <b>year</b> 12:19 15:6 22:17 32:21 79:10 81:19,20 92:24 113:16 <b>years</b> 14:1,2 21:8 28:24 29:15 55:24 84:22 104:22 113:21 113:25 115:19 117:12 <b>yesterday</b> 75:12 <b>young</b> 22:3 <b>younger</b> 22:23</p> <hr/> <p style="text-align: center;"><b>Z</b></p> <hr/> <p><b>zero</b> 110:23</p> <hr/> <p style="text-align: center;"><b>0</b></p> <hr/> <p><b>003826</b> 27:2 <b>003881</b> 54:6 <b>003883</b> 53:3 <b>003941</b> 75:4 <b>003943</b> 69:21 <b>004037</b> 56:17 84:8 <b>005122</b> 50:6 <b>005221</b> 64:17 <b>005224</b> 67:7 <b>007528</b> 78:4</p> <hr/> <p style="text-align: center;"><b>1</b></p> <hr/> <p><b>1</b> 10:9 59:5 <b>1:46</b> 1:25 128:13 <b>10</b> 3:4,16 56:13,14 62:18 64:24 67:10 84:6 <b>11</b> 3:19 62:15,18 <b>12</b> 3:21 64:13,16 67:14 <b>12/11/2017</b> 4:13 <b>13</b> 4:2 67:3,5 <b>14</b> 4:5 69:18,20 129:21 <b>15</b> 4:8 59:5 75:1,3</p>	<p><b>16</b> 4:11 27:9 56:17 59:5 65:4 68:3 69:3 77:23,25 78:1,2 <b>16th</b> 71:10 72:6 <b>17</b> 4:14 59:10 95:15,16 <b>1993</b> 90:10 <b>1997</b> 113:17 <b>1st</b> 15:5,6</p> <hr/> <p style="text-align: center;"><b>2</b></p> <hr/> <p><b>2</b> 53:7,8 54:9 70:4 <b>2/10/2017</b> 3:20 <b>2/16/2017</b> 3:18,23 4:4 <b>2/20/2017</b> 3:10 <b>20</b> 50:20 <b>2002</b> 32:22 <b>2007</b> 12:20 <b>2009</b> 37:18 94:25 106:25 107:4 113:18,19 114:11 117:19 118:18 119:9,15 <b>201</b> 1:23 5:3 <b>2012</b> 18:7 119:5,5 <b>2014</b> 119:3 <b>2015</b> 14:5 119:4 <b>2016</b> 19:11 119:4 119:5 <b>2017</b> 19:10 27:8 29:18 50:20 53:7,8 54:9 56:18 59:5,10 59:13 62:18 65:4 68:3 69:3 70:4 75:13 78:14 80:2 81:5 <b>2017-47</b> 8:6 <b>2018</b> 1:23 29:18 117:14 129:11 130:14 <b>2019</b> 15:6,7,11,12 129:21</p>	<p><b>24-1</b> 86:9 <b>24th</b> 78:23 <b>26</b> 3:7 27:8 <b>2nd</b> 74:9</p> <hr/> <p style="text-align: center;"><b>3</b></p> <hr/> <p><b>3/2/2017</b> 3:13,15 4:7 <b>30th</b> 15:5 <b>31</b> 1:23 <b>315</b> 2:12 <b>3200</b> 1:24 5:4 <b>32854-0774</b> 2:3 <b>33601-0380</b> 2:8 <b>33602-5211</b> 2:12 <b>33603</b> 1:24 <b>380</b> 2:8</p> <hr/> <p style="text-align: center;"><b>4</b></p> <hr/> <p><b>4</b> 86:4 114:20 <b>4/7/2017</b> 4:10 <b>407-875-0770</b> 2:4 <b>4th</b> 129:10 130:14</p> <hr/> <p style="text-align: center;"><b>5</b></p> <hr/> <p><b>5</b> 3:2,2,4 9:25 10:1 10:3,9 <b>50</b> 3:9 <b>52</b> 3:11 <b>53</b> 3:14 <b>540774</b> 2:2 <b>56</b> 3:16 <b>5th</b> 15:10</p> <hr/> <p style="text-align: center;"><b>6</b></p> <hr/> <p><b>6</b> 3:7 9:14 26:22 26:23 61:19 <b>62</b> 3:19 <b>64</b> 3:21 <b>67</b> 4:2 <b>69</b> 4:5 <b>6th</b> 71:13 75:17</p> <hr/> <p style="text-align: center;"><b>7</b></p> <hr/> <p><b>7</b> 3:9 10:9 50:1,4 60:24 75:13</p>	<p>78:14 <b>75</b> 4:8 <b>77</b> 4:11 <b>7th</b> 80:9,13</p> <hr/> <p style="text-align: center;"><b>8</b></p> <hr/> <p><b>8</b> 3:11 10:10 52:24 53:2 80:2 81:5 <b>8:17-cv-02896-...</b> 1:2 <b>800-671-1776</b> 2:3 <b>813-221-2626</b> 2:9 <b>813-274-7599</b> 2:13 <b>8th</b> 80:10</p> <hr/> <p style="text-align: center;"><b>9</b></p> <hr/> <p><b>9</b> 3:14 10:12 53:25 54:3 <b>9:02</b> 1:25 <b>93</b> 119:8 <b>936928</b> 129:20 <b>95</b> 4:14 <b>98</b> 119:9</p>
--	---	---	--

IN THE UNITED STATES DISTRICT COURT FOR  
THE MIDDLE DISTRICT OF FLORIDA  
Tampa Division  
Civil Action No. 8:17-cv-02896-CEH-AAS

ROBERT L. VAZZO, LMFT, individually  
and on behalf of his patients,  
DAVID H. PICKUP, LMFT, individually  
and on behalf of his patients, and  
SOLI DEO GLORIA INTERNATIONAL,  
INC., d/b/a NEW HEARTS OUTREACH  
TAMPA BAY, individually and on behalf  
of its members, constituents and clients,

Plaintiffs,

vs.

CITY OF TAMPA, FLORIDA, and  
SAL RUGGIERO, in his official capacity as  
Manager of the City of Tampa  
Neighborhood Enhancement Division,

Defendants.

\_\_\_\_\_ /

\* \* \* \* \*

DEPOSITION OF JERROD SIMPSON, ESQUIRE  
TAKEN AT THE INSTANCE OF THE PLAINTIFFS

\* \* \* \* \*

DATE: October 31, 2018  
PLACE: 201 North Franklin Street  
Suite 3200  
Tampa, Florida 33603  
TIME: 1:47 - 5:29 o'clock p.m.

1 APPEARANCES:  
2 LIBERTY COUNSEL  
PO Box 540774  
3 Orlando, Florida 32854-0774  
Telephone: 800-671-1776  
4 Fax: 407-875-0770  
Attorneys for the Plaintiffs  
5 BY: HORATIO G. MIHET, ESQUIRE  
Email: Hmihet@lc.org  
6 BY: ROGER GANNAM, ESQUIRE  
Email: Rgannam@lc.org  
7  
BURR & FORMAN, LLP  
8 PO Box 380  
Tampa, Florida 33601-0380  
9 Telephone: 813-221-2626  
Attorneys for the City of Tampa  
10 BY: ROBERT V. WILLIAMS, ESQUIRE  
Email: Rwilliams@burr.com  
11  
CITY OF TAMPA  
12 315 East Kennedy Boulevard  
Tampa, Florida 33602-5211  
13 Telephone: 813-274-7599  
BY: DAVID HARVEY, ESQUIRE  
14 Email: David.harvey@tampagov.net  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

1		
	INDEX	
2		PAGE
	JERROD SIMPSON, ESQUIRE	5
3	DIRECT EXAMINATION BY MR. GANNAM	5
4	EXHIBITS	
		PAGE
5	Plaintiffs' Exhibit No. 18 marked for identification	11
6	(Defendant City of Tampa, Florida's	
7	Responses and Objections to Plaintiff	
8	Robert Vazzo's First Set of Requests for	
9	Admission, Interrogatories, and Requests	
10	for Production)	
11	Plaintiffs' Exhibit No. 19 marked for	42
12	identification	
13	(E-mail string starting from Heather	
14	Herlein to Kimber Spitsberg dated	
15	2/6/2018)	
16	Plaintiffs' Exhibit No. 20 marked for	47
17	identification	
18	(E-mail from Tatiana Henao to Ernest	
19	Mueller dated 2/13/2017)	
20	Plaintiffs' Exhibit No. 21 marked for	50
21	identification	
22	(E-mail from Ernest Mueller to Tatiana	
23	Henao dated 2/24/2017)	
24	Plaintiffs' Exhibit No. 22 marked for	52
25	identification	
26	(E-mail from Jerrod Simpson to Ernest	
27	Mueller dated 2/27/2017)	
28	Plaintiffs' Exhibit No. 23 marked for	57
29	identification	
30	(E-mail from Jerrod Simpson to Ernest	
31	Mueller dated 2/27/2107)	
32	Plaintiffs' Exhibit No. 24 marked for	122
33	identification	
34	(E-mail from Helene Hvizd to Ernest Mueller	
35	dated 3/16/2017)	

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

EXHIBITS CONTINUED

Plaintiffs' Exhibit No. 25 marked for identification (E-mail from Jerrod Simpson to Erin Bradley and Ernest Mueller dated 3/9/2017)	125
Plaintiffs' Exhibit No. 26 marked for identification (Considerations for Conversion Therapy Ordinance)	128
Plaintiffs' Exhibit No. 27 marked for identification (Memo from Ernest Mueller to the City Council)	128

1           The deposition of JERROD SIMPSON, ESQUIRE, witness,  
2           was taken before me, Rachele Cibula, Notary Public,  
3           State of Florida at large, at 201 North Franklin Street,  
4           Suite 3200, in the City of Tampa, County of  
5           Hillsborough, State of Florida, pursuant to notice in  
6           said cause for the purpose of taking said deposition at  
7           the instance of the Plaintiffs in the above-styled  
8           action pending in the above-styled court.

9                           THE COURT REPORTER: Raise your right hand,  
10           Please, sir.

11           THEREUPON,

12                           JERROD SIMPSON, ESQUIRE,  
13           being by me first duly sworn to testify the whole truth  
14           as is hereinafter certified, testifies as follows:

15                           THE WITNESS: I do.

16                           DIRECT EXAMINATION

17           BY MR. GANNAM:

18           Q. All right. Mr. Simpson, good afternoon. I am  
19           the attorney for -- or one of the attorneys for the  
20           Plaintiffs in this lawsuit. My name is Roger Gannam.  
21           And we're going to be continuing with the deposition of  
22           Defendant, City of Tampa.

23                           Before we get into the questions, I want to go  
24           over some of the same ground rules I went over with the  
25           prior witness. I know you've been here most of the day,

1 so forgive me if some of this is cumulative.

2 First of all, let me ask, have you ever given a  
3 deposition before?

4 A. No.

5 Q. Okay. Have you ever taken a deposition before?

6 A. No.

7 Q. We are making a transcript, so it's important  
8 that we only speak one at a time. Are you okay with  
9 that?

10 A. Yes.

11 Q. It's also important that all of your answers be  
12 out loud as opposed to nonverbal responses. Is that  
13 okay?

14 A. Yes.

15 Q. If you don't understand a question, please tell  
16 me; and I will address whatever problem might be. Are  
17 you okay with that?

18 A. Yes.

19 Q. And, if I do ask a question that you answer, I  
20 will assume that you understood me. Is that okay with  
21 you?

22 A. Yes.

23 Q. Your lawyer may object. And, as a general rule,  
24 you should go ahead and answer my question anyway unless  
25 your lawyer tells you not to answer. Are you okay with

1 that?

2 A. Yes.

3 Q. We can take breaks, so let me know if you need  
4 one. I would only ask that, if I've asked a question,  
5 that you answer before we start a break. Is that okay?

6 A. Yes.

7 Q. Any questions for me before we continue?

8 A. No.

9 Q. All right. Go over a couple of definitions.  
10 Again, these are somewhat redundant since we did it this  
11 morning. But, when I say the City or City, I'm  
12 referring to the City of Tampa unless I say otherwise.  
13 Do you understand that?

14 A. Yes.

15 Q. And, when I say the ordinance, I'm referring to  
16 Tampa Ordinance 2017-47, also known as the Conversion  
17 Therapy Ban or Conversion Therapy Ordinance. Do you  
18 understand that?

19 A. Yes.

20 Q. The letters LGBT stand for lesbian, gay,  
21 bisexual, transgender. Do you understand that?

22 A. Yes.

23 Q. The initials S-O-C-E or SOCE stand for sexual  
24 orientation change efforts. Do you understand that?

25 A. Yes.

1 Q. And the initials GICE, if I use them, would stand  
2 for gender identity change efforts. Do you understand  
3 that?

4 A. Yes.

5 Q. If I talk about conversion therapy, I may be  
6 referring generally to SOCE or GICE or any practice  
7 that's otherwise covered by the ordinance. Do you  
8 understand that?

9 A. Yes.

10 Q. All right. Can you just state your name and  
11 business address for the record, please.

12 A. It's Jerrod Simpson. And it's 315 East Kennedy  
13 Boulevard in Tampa, Florida. 33602 I believe is the  
14 zip.

15 Q. And, Mr. Simpson, are you currently taking any  
16 medication that would affect your ability to testify  
17 truthfully or recall facts today?

18 A. No.

19 Q. And do you have any injury or condition that  
20 would affect your ability to recall facts or testify  
21 truthfully?

22 A. No.

23 Q. All right. It's my understanding you are  
24 appearing here today as the designee for the City of  
25 Tampa pursuant to a Notice of Deposition which you'll

Page 9

1 find in front of you as Exhibit 5. They should be in  
2 order. And on page three of that notice begins the list  
3 of topics. And I just want to confirm. It's our  
4 understanding that you are designated to testify  
5 regarding topics 6, 9, 11 and 12. Is that also your  
6 understanding?

7 A. Yes.

8 Q. And 12 is modified by the court order to exclude  
9 sub-part D. Is that also your understanding?

10 A. Yes.

11 Q. Okay. Do you also understand that your  
12 appearance on behalf of the City means that, when I ask  
13 you a question, you'll be testifying, not to your  
14 personal knowledge, but also, more generally speaking,  
15 what the City knows in response to my questions?

16 A. I'm sorry. Is that -- what was your question  
17 there?

18 Q. Do you understand that that's the case?

19 A. Yes.

20 Q. And let me begin the questions then with -- just  
21 for the record, I'll clarify. When I say do you know,  
22 I'm asking you does the City know. Does that make  
23 sense?

24 A. Yes.

25 Q. Now, you were here for most of the questioning of

1 Mr. Maniscalco; is that correct?

2 A. Yes.

3 Q. Did you hear anything Mr. Maniscalco said that --  
4 as you sit here now, that you disagree with or would  
5 want to correct?

6 A. Can I repeat the question as if what I think  
7 you're asking?

8 Q. Sure.

9 A. Did he say things that I disagree with? Is that  
10 what you --

11 Q. In terms of -- I should clarify.

12 Did Mr. Maniscalco testify to anything factually  
13 that you think needs correction or that you disagree  
14 with as a factual matter?

15 MR. WILLIAMS: I'm glad you repeated the  
16 question because I assumed that you -- your question, as  
17 posed, is asking Mr. Simpson about anything that  
18 Mr. Maniscalco said that would come within the ambit of  
19 the designated matters for which Mr. Simpson is  
20 appearing that you delineated on the record.

21 To that extent, if it's beyond that, I  
22 object because that would not be fair to Mr. Simpson.  
23 Beyond that, if you can answer the question,  
24 Mr. Simpson, my objection is on the record.

25 THE WITNESS: There may be answers that I

1 give that might be different than answers that he gave.  
2 But I don't have anything specific that I would -- that  
3 I would want to correct.

4 BY MR. GANNAM:

5 Q. Okay. Just sort -- just a practice to give the  
6 City a chance to correct the City, you know, so that we  
7 have a good record at the end of the day.

8 MR. WILLIAMS: Well, there is the errata  
9 sheet --

10 MR. GANNAM: Sure.

11 MR. WILLIAMS: -- that the City is entitled  
12 to sign after the transcript is typed up and delivered.

13 BY MR. GANNAM:

14 Q. I'm going to show you a new exhibit that we'll  
15 mark as Plaintiffs' 18.

16 (Plaintiffs' Exhibit No. 18 marked for identification)

17 BY MR. GANNAM:

18 Q. And this is a copy of the City's written  
19 responses and objections to the Plaintiffs' written  
20 discovery requests. Do you recognize this document?

21 A. Yes.

22 Q. I want to point you to the last -- second to last  
23 page.

24 MR. WILLIAMS: Page forty-six?

25 MR. GANNAM: Page forty-six.

1 BY MR. GANNAM:

2 Q. At the top, it says, Verification to Answers to  
3 Interrogatories. Is that your signature that appears  
4 there?

5 A. Yes.

6 Q. And so I am -- is it correct to say that you are  
7 the official who verified these answers on behalf of the  
8 City of Tampa?

9 A. Yes.

10 Q. Okay. And just, as we sit here today, are you  
11 currently aware of any factual statement in these  
12 answers to discovery that are inaccurate or need to be  
13 changed or updated?

14 A. No.

15 Q. Okay. Did you review any documents to prepare  
16 for your testimony today?

17 A. Yes.

18 Q. What did you review?

19 A. I reviewed my file that -- from the time that I  
20 was working on the ordinance during the time of passage.  
21 I reviewed the -- the research that is cited in the  
22 whereas clauses. I reviewed some of the litigation  
23 documents in this case and the parallel case that's  
24 happening in the Southern District.

25 Q. Is that the Otto case?

1 A. Yes.

2 Q. Okay.

3 A. And I think that's it for documents.

4 MR. WILLIAMS: Before counsel asks the next  
5 question, I want to point out to you, Mr. Simpson, that  
6 there's a court order that governs the discovery of  
7 documents in this case. And that order names twenty  
8 custodians, and you are not one of those custodians. So  
9 to the extent that there are documents that you reviewed  
10 that would not come within the ambit of that order that  
11 are not yet public, you are not to disclose those. I  
12 don't think there are any, but I'll leave it up to you.  
13 Do you understand the point of my -- my point?

14 THE WITNESS: I think so. Yeah.

15 BY MR. GANNAM:

16 Q. To follow up what your counsel just stated, are  
17 you aware, generally speaking, of the Court's discovery  
18 orders designating twenty particular document custodians  
19 and thirty particular search terms relating to discovery  
20 in this case?

21 MR. WILLIAMS: In a timeframe?

22 MR. GANNAM: And a timeframe, correct.

23 THE WITNESS: Yes.

24 BY MR. GANNAM:

25 Q. And is it your understanding that you are not one

1 of the twenty custodians?

2 A. Yes.

3 Q. Can you tell me -- you said you reviewed your  
4 file from working on the ordinance. Can you tell me the  
5 types of documents that are in that file?

6 A. There's some case law. There are copies of the  
7 studies. There are correspondence, e-mails. I believe  
8 that's it.

9 Q. And, to your knowledge, have any of the contents  
10 of your file -- or what you refer to as your file --  
11 been produced as documents that were within the custody  
12 of any of the twenty identified custodians?

13 A. I haven't personally reviewed all of the  
14 documents that were produced in this case. So I don't  
15 think I can -- I'm not sure how to answer your question.

16 Q. I was going to ask you what your involvement was  
17 in the -- the production of documents in this case. Do  
18 I understand correctly that you have -- you personally  
19 have reviewed all of the documents that were produced in  
20 this case?

21 A. No. What I just said is that I have not  
22 personally reviewed all the documents that were  
23 produced. And so that's why I couldn't say what is in  
24 my file, whether or not that was produced or not, I  
25 can't say because I did not review what was produced.

Page 15

1 Q. So, as you sit here, you don't know the answer to  
2 whether documents one or any of them have been produced  
3 in this case by someone else or by one of those other  
4 custodians?

5 A. I know that documents were produced. I know that  
6 they were produced in accordance with the terms of the  
7 order, which limits custodians, limits search terms and  
8 limits timeframe. Whether or not there are documents in  
9 my file that -- that do not fall into those categories I  
10 can't say with certainty.

11 Q. Did any of the documents that you reviewed from  
12 your file in preparation for your testimony today  
13 refresh your recollection regarding matters that you  
14 will be testifying to today?

15 A. Well, I don't -- I don't think I can answer that  
16 either because I'm not sure exactly what you're going to  
17 ask me. I mean, are you -- with regard to specific  
18 topics? If you could clarify.

19 Q. Fair enough. I guess all I can ask you at this  
20 point is in -- in your preparation for the particular  
21 topics, did you -- do you believe that reviewing any of  
22 the documents from your file refreshed your recollection  
23 as to any of the particular topics that you're appearing  
24 for today?

25 A. I'm sorry. I really -- I'm having trouble

Page 16

1 understanding the question. I mean, when -- I reviewed  
2 the file to refresh my recollection what happened during  
3 the time that we were working on the ordinance. And so  
4 I don't really know how to answer beyond that.

5 Q. We'll deal with them specifically I guess as it  
6 comes up.

7 So, apart from the review of your file, review of  
8 some research, review of some litigation documents both  
9 from this case and from the Otto case pending in the  
10 Southern District, were there any other documents that  
11 you reviewed in preparation for your testimony today?

12 A. No.

13 Q. Did you speak to anyone to prepare for your  
14 testimony today?

15 A. Yes. I -- I'm just -- that you're going to ask  
16 me who it was --

17 Q. Right.

18 A. -- that I spoke with? My attorneys, obviously,  
19 here; and I spoke with Ernie Mueller and Sal Ruggiero.

20 Q. And the attorneys here, you mean Rob Williams?

21 A. Yes. And David Harvey.

22 Q. And David Harvey. Okay.

23 And Mr. Mueller and Mr. Ruggiero.

24 When did you -- how many times did you meet with  
25 Mr. Williams?

1 A. I don't recall.

2 Q. Was it more than once?

3 A. Yes.

4 Q. Do you recall approximately how many times?

5 A. Anywhere from three to five times maybe.

6 Q. About how much time total did you spend in those  
7 meetings?

8 A. Anywhere from fifteen minutes to an hour.

9 Q. I guess what I'm looking for is sort of a total  
10 of about how much time you think you spent with  
11 Mr. Williams in total?

12 A. Just taking those two estimates, rough estimates,  
13 I'd have -- you know, say five -- five times.  
14 Conservatively saying an hour each, maybe five hours.

15 Q. Okay. That's all I'm asking for is just to --  
16 you know, as best you can.

17 Now, were those meetings with Mr. Williams alone;  
18 or were there others present there?

19 A. There were others present. They were different.  
20 I mean, obviously, there were several meetings.

21 Q. Okay. So at any of the meetings was Mr. Harvey  
22 also there, for example?

23 A. Yes.

24 Q. Did you have any meetings with Mr. Harvey alone?

25 A. Yes.

1 Q. About how many times?

2 A. Maybe three.

3 Q. Okay.

4 A. Four.

5 Q. For about how long total?

6 A. I'm estimating the same, thirty minutes to an  
7 hour.

8 Q. At each meeting, you would estimate? Or total?

9 A. For each, yeah.

10 Q. So thirty minutes to an hour times three is  
11 anywhere between ninety minutes to three hours,  
12 approximately?

13 A. Sure.

14 Q. Okay. And did you ever -- I guess, the same  
15 question for -- for Mr. Mueller. Did you have -- how  
16 many meetings did you have with him?

17 A. I think I had two meetings probably. Less  
18 meetings with Ernie than the others, and those were  
19 shorter.

20 Q. And, with Mr. Mueller, did you meet with him  
21 alone?

22 A. Yes.

23 Q. And, again, approximately how much time total?

24 A. Fifteen minutes.

25 Q. Okay. And with Mr. Ruggiero -- is it Ruggero or

1 Ruggiero?

2 A. Well, it's spelled Ruggiero. But I think I've  
3 even heard him say Ruggiero.

4 Q. Okay.

5 A. So I -- you'll have to ask him what he prefers.

6 MR. WILLIAMS: Just for the record, I did  
7 ask him that; and he pronounces it Ruggiero --

8 MR. GANNAM: Ruggiero, okay.

9 MR. WILLIAMS: -- as opposed to Ruggiero,  
10 which is the way it's spelled. So I'm going to go with  
11 Sal's pronunciation since it's his name --

12 MR. GANNAM: Sounds good.

13 MR. WILLIAMS: -- and I highly recommend  
14 that we all do that.

15 MR. GANNAM: Understood.

16 BY MR. GANNAM:

17 Q. How many times did you meet with Mr. Ruggiero?

18 A. I briefly spoke with him over the phone once --

19 Q. And when was that?

20 A. -- maybe twice. I can't remember.

21 Maybe a week ago. I don't remember specifically.

22 Q. Now, was that for you to prepare for your  
23 testimony or for him to prepare for his testimony; or  
24 was it mutual?

25 A. Well, I can't speak to what his thoughts were. I

1 mean, I was calling because I knew that I was going to  
2 be a representative of the City; and there could be some  
3 questions about enforcement and just wanted to get an  
4 understanding on some things so that I could speak as a  
5 representative of the organization.

6 Q. Okay. So, besides meetings with Mr. Williams,  
7 Mr. Harvey, Mr. Mueller and Mr. Ruggiero, did you meet  
8 with anyone else to prepare for your testimony today?

9 A. No.

10 Q. Okay. When you said earlier that there were  
11 other people present at at least some of your meetings  
12 with Mr. Williams, are those other people limited to  
13 Mr. Harvey, Mr. Mueller, Mr. Ruggiero?

14 A. No.

15 Q. Who else was in any of those meetings with  
16 Mr. Williams?

17 A. Jerry Gowartz (phonetic).

18 Q. Anyone else?

19 A. I don't believe so.

20 Q. In connection with the document production that  
21 occurred in this case, were you asked to search your  
22 files for responsive documents by anyone else?

23 A. Yes.

24 Q. Okay. Who asked?

25 A. Rob's paralegal sent out a memo that I received

1 that requested documents to be produced and preserved as  
2 part of this litigation. And I did receive that.

3 MR. WILLIAMS: "Rob," referring to  
4 Rob Williams, just for the record.

5 BY MR. GANNAM:

6 Q. Did you, in fact, follow whatever instructions  
7 were in that memo?

8 A. Yes.

9 Q. And did you provide documents to Mr. Williams'  
10 office in response to that memo?

11 A. Yes.

12 Q. And were those documents limited to the thirty  
13 search terms that were ordered by the Court?

14 A. I provided my entire file.

15 Q. Okay. Can you give me an idea -- let me strike  
16 that.

17 Your file, was it kept on paper, electronically  
18 or some combination of --

19 A. Electronic.

20 Q. Electronic. Okay.

21 Approximately how many documents were in your  
22 file?

23 A. I can't say with certainty. I don't know.

24 Q. Okay. Would you have any more certainty if I  
25 asked you approximately how many pages' worth of

1 documents?

2 A. No, it's electronic. So...

3 Q. And, it's a long shot; but would you have more  
4 certainty if I asked you how many, you know, kilobytes  
5 or megabytes those files consisted of?

6 A. No.

7 Q. Let me talk about your position with the City.  
8 What is your official title?

9 A. I'm an assistant city attorney.

10 Q. How long have you been in that position?

11 A. For three years.

12 Q. And have you ever worked as an attorney anywhere  
13 else?

14 A. No.

15 Q. And when did you graduate from law school?

16 A. 2015.

17 Q. And which school?

18 A. It's the Cooley Law School. It's the Western  
19 Michigan University Cooley Law School. There's a campus  
20 here in Riverview.

21 Q. Are you from Florida? Or are you from --

22 A. Yes.

23 Q. Okay. Apart from -- I assume you had an  
24 undergraduate degree too. Any other education after  
25 high school besides an undergraduate degree and your law

1 school degree?

2 A. I don't know what you mean by, "education," I  
3 guess, to clarify.

4 Q. Any degrees --

5 A. School of hard knocks.

6 Q. Did you earn a bachelor's degree somewhere before  
7 law school?

8 A. Yes.

9 Q. And you have your law degree, correct?

10 A. Yes.

11 Q. Any other degrees that you've received?

12 A. No.

13 Q. When did you pass the Florida Bar exam?

14 A. 2015.

15 Q. Are you admitted in the Bars of any other states?

16 A. No.

17 Q. Do you hold any other professional licensure or  
18 certifications besides your -- your Bar --

19 A. No.

20 Q. Do you engage in litigation on behalf of the City  
21 of Tampa?

22 A. Not usually.

23 Q. Have you ever?

24 A. Yes.

25 Q. What kinds of cases have you been involved in?

1 A. I've done some responses for writs for certiori  
2 involving rezoning decisions. I've taken part in code  
3 enforcement appeals. And then I am the municipal  
4 prosecutor for the City, and I handle the prosecution of  
5 code enforcement matters that are done in county court.

6 Q. You ever been involved in cases involving First  
7 Amendment rights?

8 A. In litigation?

9 Q. In litigation.

10 A. Yes.

11 Q. What kinds of cases or what cases were those?

12 A. I was not an attorney of record, but I was  
13 somewhat involved in a case where it was Homeless  
14 Helping Homeless. It was a First Amendment lawsuit in  
15 the Middle District.

16 Q. Is Homeless Helping Homeless the name of an  
17 entity?

18 A. Yes. I believe the case style was Homeless  
19 Helping Homeless v. City of Tampa.

20 Q. Any others involving First Amendment rights?

21 A. No.

22 Q. What about, more generally, civil rights other  
23 than First Amendment rights?

24 A. Again, you're referring -- are you referring to  
25 litigation --

1 Q. Litigation, right. Right.

2 A. -- specifically?

3 No.

4 Q. Prior to the enactment of the ordinance, were you  
5 involved in any advocacy for LGBT organizations or  
6 causes?

7 A. No.

8 Q. How about since the enactment of the ordinance?

9 A. No.

10 Q. Have you received any education or training in  
11 counseling or mental health?

12 A. No.

13 Q. What is Mr. Mueller's position in the City  
14 Attorney's Office?

15 A. His current position is the Chief Assistant City  
16 Attorney over the Administrative Division.

17 Q. Is that the division that you're in?

18 A. Yes.

19 Q. Is he your direct supervisor?

20 A. No.

21 Q. Who is your direct supervisor?

22 A. Rebecca Kert.

23 Q. How do you spell her last name?

24 A. K-e-r-t.

25 Q. What's her title?

1 A. Senior Assistant City Attorney.

2 Q. At the time that this ordinance originated, was  
3 Mr. Mueller in that same chief assistant position?

4 A. I believe he was a Senior Assistant City Attorney  
5 at the time.

6 Q. When did he take on that chief assistant  
7 designation or title?

8 A. I don't know specific dates.

9 Q. During the period of time from the first proposal  
10 of the ordinance by Council Member Maniscalco to its  
11 enactment, was Mr. Mueller a Senior Assistant City  
12 Attorney during that entire time?

13 A. I believe so.

14 Q. And, at that time, was he your direct supervisor?

15 A. No.

16 Q. Was it Ms. Kert?

17 A. Yes.

18 Q. Okay. Did Mr. Mueller work on drafting of the  
19 ordinance?

20 A. Yes.

21 Q. And did you work on drafting the ordinance?

22 A. Yes.

23 Q. If I were just to ask you who drafted the  
24 ordinance, was there a principal drafter or one person  
25 who is more responsible than anyone else?

1 A. I guess I would need to know what you mean by,  
2 "drafting," in order to answer that.

3 Q. Who took the first crack at it? Does that help?

4 A. No.

5 Q. Okay. Tell me about the process of drafting the  
6 ordinance.

7 A. The motion came in. The motion specifically  
8 referenced City of Miami Beach, I believe, as a point of  
9 clarification for what it was that the council member  
10 was seeking to do. And the City Attorney gets to make  
11 the assignment of who is going to be the staff person  
12 that responds to the councilman's motion.

13 Q. Who was the City Attorney at that time?

14 A. If you don't mind me referring to the -- to the  
15 ordinance, maybe I can --

16 Q. Sure.

17 A. -- refresh my recollection?

18 Q. We're talking about Exhibit -- is that Exhibit 4?

19 A. 4.

20 It's approved as to legal sufficiency by  
21 Ernest Mueller who was a Senior Assistant City Attorney  
22 at the time. I don't recall specifically if  
23 Julia Mandell was still the City Attorney at the time or  
24 if Sal Territo had become the City Attorney at that  
25 time. I don't remember. It would have been one of the

1 two.

2 Q. Mr. Territo is the City Attorney now, right?

3 A. Yes.

4 Q. And who is -- you said Julia Mandell?

5 A. Julia Mandell was the City Attorney prior to --

6 Q. Okay.

7 A. -- Sal Territo.

8 Q. So you just don't -- as you sit here, you just  
9 don't remember which one it was at that time?

10 A. I don't recall the specific dates, and I didn't  
11 look at anything to refresh my recollection on that  
12 point.

13 Q. Mr. Mueller, in his chief assistant position, is  
14 his -- does he report directly to the City Attorney?

15 A. Yes.

16 Q. Okay. Getting back to the drafting of the  
17 ordinance. So the motion by Mr. Maniscalco was made.  
18 The City Attorney has the discretion to assign that --  
19 that drafting assignment to someone. So what happened  
20 in this case?

21 A. So Ernest Mueller was assigned the lead role in  
22 drafting and presenting the staff report. And then he  
23 reached out to me and assigned to me assistance in  
24 researching the issues in the ordinance.

25 Q. When we talk about this staff report, is that a

1 document?

2 A. No.

3 Q. Okay. What is a staff report?

4 A. In the usual course of business for the City  
5 Council, they have the authority to, by motion, order I  
6 guess you could say a -- a member of the City staff to  
7 report to the council during a -- during a public  
8 meeting. And so that would be a staff report.

9 Q. So it can be a completely verbal report without  
10 any written document to accompany it?

11 A. Correct.

12 Q. Is that the usual way it's done is through some  
13 kind of verbal report?

14 A. I don't know if I can say that there's a usual  
15 way or not a usual way. It would depend on the nature  
16 of the -- of their request for information that the  
17 council member is trying to get.

18 Q. In this case, was there a document prepared  
19 called the staff report --

20 A. No.

21 Q. -- in connection with this ordinance?

22 A. No.

23 Q. So, when the staff report was delivered to the  
24 council, who delivered it?

25 A. Ernest Mueller presented the staff report.

1 Q. And this would have been verbally on his -- as  
2 part of the public record of the City Council meeting?

3 A. Correct.

4 Q. Were you at that meeting?

5 A. Yes.

6 Q. What participation did you have in preparing the  
7 content of that staff report?

8 A. I assisted with the research on the legal issues  
9 and met with Ernie, discussing those. And then we  
10 looked at the other ordinances that were being passed in  
11 the other jurisdictions in Florida. We looked at the  
12 California bill, the New Jersey bill. We looked at that  
13 case law, talked about it like lawyers do.

14 Q. What was the specific charge given to the legal  
15 department regarding the -- what needed to be in this  
16 particular staff report?

17 A. I can't say -- it would be a matter of public  
18 record, the motion that the council member made. And we  
19 would have been looking at that specific language of  
20 that motion and following that to hopefully bring  
21 information that was pertinent to that request.

22 Q. And did the staff report provided to the council  
23 satisfy what Mr. Maniscalco had requested?

24 A. I can't speculate to whether or not he was  
25 satisfied with our --

1 Q. I just mean --

2 A. -- our presentation.

3 Q. -- in the sense of there's a public record of  
4 what he requested, and then the staff report was  
5 delivered. Is it, generally speaking, your position  
6 that whatever he requested was satisfied, that whatever  
7 information he asked for was given?

8 A. He made a motion for a staff report.  
9 Ernest Mueller provided the staff report at the public  
10 hearing.

11 Q. And then it's my understanding that, following  
12 that hearing a -- or, at that hearing, a vote was taken  
13 to move to the next step; is that correct?

14 A. Correct.

15 Q. And what was the next step in the drafting of the  
16 ordinance?

17 A. It's my understanding that the next motion that  
18 was made -- and, again, this would all be part of the  
19 record; so, if I misspeak on a specific, then it's in  
20 the record somewhere. But it's my understanding that it  
21 was moved forward to what they call first reading of the  
22 ordinance. And we were directed to bring back a -- a  
23 draft in ordinance form that would be in a proper form  
24 to go to that step of first reading.

25 Q. And who prepared that draft?

1 A. There were three people that I know that were  
2 involved in -- in preparing the draft. That would be  
3 Ernest Mueller, myself and Erin Bradley.

4 Q. Who is Erin Bradley?

5 A. I believe that her title is paralegal. I don't  
6 know what specifically her title is. But she's one of  
7 the assistants with -- at the City Attorney's Office.

8 Q. Is she assigned to a particular city attorney?

9 A. Yes.

10 Q. Who is that?

11 A. Ernest Mueller is one of her attorneys that she  
12 works for. I think she works for other attorneys, as  
13 well; but I don't know --

14 Q. Okay.

15 A. -- specifically who.

16 Q. Okay. What was your role in drafting that  
17 ordinance for the first reading?

18 A. Just research assistance.

19 Q. Did you draft any of the language?

20 A. I believe I may have drafted some of the whereas  
21 clauses -- one of the whereas clauses. I can't recall  
22 specifically. There was some discussion about -- about  
23 that.

24 Q. About the whereas clauses?

25 A. Right.

1 Q. What was the discussion?

2 A. Just -- there's lots of discussion, I mean, you  
3 know, the nature of them, what they -- what they're  
4 referring to. I looked at the papers to make sure that  
5 the language that we were quoting that was coming from  
6 was actually contained in those research papers. And  
7 then, of course, the whereas clause being the predicate  
8 for the ordinance and also the articulation of the  
9 intents and purposes of the ordinance, it was a pretty  
10 important aspect of the ordinance.

11 Q. Did your research lead you to discuss with any  
12 persons outside of the City, you know, any of the  
13 content or potential content of the draft ordinance?

14 A. No. Well, let me see if I understand your  
15 question. Are you -- when you refer to my research, are  
16 you talking about more generally? And...

17 Q. I'm speaking of -- you know, you mentioned that  
18 you provided -- your role in drafting that first draft  
19 of the ordinance included research assistance.

20 And so my question is: Did that -- did your  
21 research lead you to discuss what should be in the  
22 ordinance with anyone outside the City?

23 A. No.

24 Q. Okay. Do you know whether anyone else involved  
25 in the drafting of the ordinance discussed the content

1 of that draft with persons outside of the City? And I  
2 mean just outside of the City's employment, not  
3 necessarily outside the City's limits.

4 A. Yes. I'm of the understanding that Ernie had a  
5 discussion with one of the attorneys from one of the  
6 jurisdictions down south that we were directed by  
7 council to look at as model -- as a model ordinance.

8 Q. Do you remember which jurisdiction it was?

9 A. I believe it was Palm Beach County.

10 Q. And do you know who the attorney was in Palm  
11 Beach?

12 A. Ms. Hvizd.

13 Q. H-v-i-z-d. It's Helene -- she pronounces it  
14 Hvizd.

15 A. Hvizd. Okay. I'm not sure how she pronounces it  
16 exactly.

17 Q. I assume we're talking about the same person.

18 A. Yes. I assume so, as well. But I never spoke  
19 with her personally. But it's my understanding that  
20 Ernie may have had a conversation with her.

21 Q. Do you know whether Ernie or Ms. Bradley or  
22 anyone else involved in drafting the ordinance had  
23 conversations with, for example, Equality Florida  
24 regarding the content of the ordinance?

25 A. Do I know? I don't know of any conversations

1 between --

2 Q. What about -- same question but, instead of  
3 Equality Florida, Southern Poverty Law Center?

4 A. No. I'm not aware of any conversations between  
5 the City Attorney and that organization.

6 Q. How about the NCLR or National Center for Lesbian  
7 Rights?

8 A. Same.

9 Q. How about a man named Rand Hoch from Palm Beach  
10 County?

11 A. Same.

12 Q. All right. So who -- at some point, a draft of  
13 the ordinance was prepared, correct?

14 A. I'm not sure exactly what -- what do you mean by,  
15 "draft"? You know, obviously, at some point, we came to  
16 council with an ordinance in ordinance form, yes.

17 Q. Right. Okay. So let's work backwards from  
18 there. At the meeting that we'll call the first reading  
19 of the ordinance, a draft in ordinance form was  
20 presented to the council for vote, correct?

21 A. Correct.

22 Q. Who prepared that document, that draft ordinance?

23 A. The scrivener's work was done by Erin Bradley and  
24 then under the direction of myself and Ernest Mueller.

25 Q. Okay. Were there multiple versions or multiple

1 drafts prepared before the final one that went to the  
2 City was done?

3 A. I don't -- I don't know about that. I mean, I'm  
4 not sure how to answer that question.

5 Q. Did you ever take a draft of the ordinance and  
6 mark it up or make changes to it for Ms. Bradley, you  
7 know, to work on or to, you know, get the final version  
8 done?

9 A. No.

10 Q. Do you know whether anyone else did that?

11 A. I don't know.

12 Q. And, from the time that it was voted on at the  
13 first reading to the enactment at the second reading,  
14 were any changes made to the ordinance?

15 A. Yes.

16 Q. And what changes were those?

17 A. Well, I can't -- I don't recall specifically word  
18 for word what the changes would be. And that would also  
19 be something that would be a record that you could look  
20 at to get the specifics. But I know that there was some  
21 discussion about the enforcement process and some of the  
22 enforcement provisions.

23 Q. All right. In the process of getting the draft  
24 from, you know, first created for that first reading  
25 meeting and then ultimately enacted at the second

1 reading meeting, were there meetings between members of  
2 the City Attorney's Office and individual council  
3 members regarding the ordinance?

4 A. Yes.

5 Q. Can you generally tell me, you know, how many  
6 meetings occurred and who was involved in those?

7 A. Just rough estimate that there would have been at  
8 least one meeting with each individual council member.  
9 There may have been two, but I don't recall.

10 Q. What would be the point of that at least one  
11 meeting that you're aware of or believe happened?

12 A. The point would be for us to advise our clients  
13 on all of the legal issues and just generally provide  
14 legal advice to our client.

15 MR. WILLIAMS: And that's as far as we go on  
16 that. As far as the attorney-client privilege.

17 BY MR. GANNAM:

18 Q. Is that part of the normal course of developing a  
19 piece of legislation, for there to be a -- a meeting at  
20 some point before enactment between City Attorney staff  
21 and individual council members?

22 A. Yes.

23 Q. And is it also part of that general practice that  
24 all the council members will receive the same  
25 information at their individual meetings?

1           A. The council members will receive information  
2 based on what questions that they ask in the meetings  
3 that we have. So I don't know if I can answer your  
4 question the way that you phrased it.

5           Q. Okay.

6           A. You meet with someone. They might have different  
7 questions, and that might result in different  
8 information being provided.

9           Q. Fair enough. Is it the general practice that  
10 each council member will have the same access to  
11 information from the City Attorney's Office as all the  
12 other council members?

13          A. Yes.

14          Q. In this case, was that the case that each council  
15 member had an opportunity or the same access to  
16 information from the City Attorney's Office regarding  
17 this ordinance?

18          A. We met with each of the council members. And I  
19 guess you should know that, you know, the Sunshine Law  
20 prohibits us from being conduits or channels. So to the  
21 extent that, you know, we're bound to those legal  
22 requirements.

23          Q. And just so I can clarify. What you mean is that  
24 Council Member Maniscalco would not -- it wouldn't be  
25 proper for him to tell you, hey, pass a message along to

1 council member so and so that I'm going to support the  
2 bill; and I think he should too? Just for example.

3 A. Yes.

4 Q. That would be an improper practice?

5 A. Correct.

6 Q. So, apart from, you know, sort of being a conduit  
7 or passing messages between council members, each  
8 council member had the same opportunity to ask questions  
9 about whatever they needed to know in connection with  
10 the ordinance, correct?

11 MR. WILLIAMS: Or she.

12 MR. GANNAM: He or she. Very good.

13 BY MR. GANNAM:

14 Q. In this case, you know there was at least one  
15 meeting, possibly more than one. But, in any case, it  
16 would have been the same number of meetings with each  
17 council member, correct?

18 A. I can't recall specifically if another council  
19 member had requested a follow-up meeting or if there  
20 was -- if there were more -- if there was more than one  
21 meeting. It would have all been calendared --

22 Q. Okay.

23 A. -- in the public -- in -- and, therefore, a  
24 public record would have been created of those meetings.  
25 But I don't recall specifically if anyone requested a

1 follow-up. Our office arranged a meeting with each of  
2 the council members.

3 Q. And that was as a matter of a normal practice?

4 A. That's correct.

5 Q. Would it be accurate to say then that whatever  
6 information was delivered to council members at any one  
7 of those meetings would be fairly viewed as information  
8 considered by the council in connection with the  
9 enactment of this ordinance?

10 A. Well, I think that depends on how you're defining  
11 considered. As a legal matter -- I mean, I guess I  
12 don't really understand the question.

13 Q. Okay. Fair enough.

14 In deciding what did the City of Tampa consider  
15 in connection with the enactment of this ordinance, just  
16 trying to figure out where to draw the line. I think  
17 it's obvious that anything shared at a public meeting of  
18 all the council members would be fairly said information  
19 considered by the council. Do you agree with that?

20 A. Anything provided at a public hearing during the  
21 course of the enactment would be -- would be part of the  
22 consideration, the legal considerations of the body.

23 Q. So to what extent is information shared with an  
24 individual council member at one of these series of  
25 meetings that occur with all the council members

1 considered -- information considered by the council?

2 A. Again, I'm just struggling with your -- what's  
3 considered -- it seems like you're asking for me to  
4 speculate on what -- whether or not a council member was  
5 -- what they were thinking or what they weren't thinking  
6 and -- about a meeting that my attorney is telling me is  
7 privileged. And so I'm not sure --

8 Q. Okay.

9 A. -- I still don't understand your question.

10 Q. Fair enough. Is there any record kept or minutes  
11 taken at these individual meetings of council members?

12 A. No.

13 Q. So the only way to know what was said at any one  
14 of these meetings would be to ask either the council  
15 member or the City Attorney staff members who were  
16 present, correct?

17 A. Right.

18 Q. How many of these meetings did you personally  
19 attend?

20 A. I don't remember. Maybe three.

21 Q. And how many council members are there?

22 A. Seven.

23 Q. Seven? Okay.

24 And is that -- would that be usual that you  
25 wouldn't necessarily go to all of them yourself, that

1 you guys split them up?

2 A. Yes. Being that I was not the actual lead  
3 attorney of record presenting the -- the ordinance, I  
4 was just a secondary assisting with research, it's usual  
5 that I would come as available to the meetings with  
6 council members.

7 Q. I'm going to show you a document that I'll mark  
8 as Exhibit 20 -- I'm sorry, 19.

9 (Plaintiffs' Exhibit No. 19 marked for identification)

10 THE WITNESS: This is -- mine is marked as  
11 19.

12 MR. GANNAM: 19, yes. 19 is correct. I  
13 misspoke.

14 BY MR. GANNAM:

15 Q. This was produced as COT PRODUCTION 001736. The  
16 first page shows it's from Heather Herlene or Herlein.  
17 It's dated Tuesday, February 6, 2018, to  
18 Kimber Spitsberg. The subject says, restricted, per  
19 your request. And it refers to about seven attachments  
20 that are all .msg files, which I understand to be  
21 Microsoft Outlook e-mail messages.

22 First, let me ask you is: Is this document  
23 familiar to you at all?

24 A. No.

25 Q. Before today, have you ever seen it before?

1 A. Not to my knowledge.

2 Q. I'm going to ask you to flip to the second page.

3 Says, subject, meeting with Charlie Miranda, dash,  
4 conversion therapy; location, Councilman Miranda's  
5 office; start, February 27, 2017, ten-thirty a.m. And  
6 it has, organizer, Heather Herlein; required attendees,  
7 Ernest Mueller; and resources, Councilman Miranda's  
8 office.

9 I know I didn't read everything. But the  
10 portions that I did read, did I read them correctly?

11 A. Yes.

12 Q. Do you recognize the format of this document to  
13 the extent you could identify, you know, what it is or  
14 where it came from?

15 A. No.

16 Q. Do you know who Heather Herlein is?

17 A. Yes.

18 Q. Who is that?

19 A. I believe her title is executive aide.

20 Q. Is that executive aide to any particular person?

21 A. Yes. The executive would be the City Attorney.  
22 And, again, I don't recall at the time whether that was  
23 Sal Territo or Julia Mandell.

24 Q. So Ms. Herlein works directly for the City  
25 Attorney?

1 A. Yes.

2 Q. Who is Kimber Spritzberg?

3 A. She's a paralegal at the City Attorney's Office.

4 Q. Is she assigned to any particular attorney?

5 A. Yes.

6 Q. Who is that?

7 A. Yeah. I don't know specifically who she's  
8 assigned to.

9 Q. This subject on the first page, it says,  
10 restricted per your request. Have you ever seen that  
11 before on a -- on a city e-mail or e-mail within the  
12 City Attorney's Office?

13 A. I've seen restricted.

14 Q. Is that a -- is that some kind of term of art  
15 used within the City Attorney's Office, or is that  
16 pursuant to some internal procedure that certain e-mails  
17 should be designated restricted?

18 A. I don't know that there's any written procedure  
19 within the office. But the -- the intent of flagging a  
20 message with restricted is to sort of put a person who  
21 is going to be reviewing a public records request that  
22 the nature of this communication might fall under one of  
23 the exemptions under public records. So it could be --  
24 it could not -- it might not be a public record. But  
25 the paralegals don't make that decision. But they --

1 here, it says, per your request. I think the  
2 implication is that someone informed the sender of this  
3 message that it could potentially be restricted content.  
4 It doesn't mean that it is or isn't. That would be  
5 determined at the time that the document was requested.

6 Q. Going back to that -- let me ask you to go to the  
7 third page. It shows --

8 MR. WILLIAMS: For the record, that's  
9 001738?

10 MR. GANNAM: That's correct.

11 BY MR. GANNAM:

12 Q. Appears to be an e-mail message from  
13 Heather Herlein dated February 24, 2017, to Mary Bryan.  
14 Do you know who Mary Bryan is?

15 A. Yes.

16 Q. Who's that?

17 A. She's a legislative aide.

18 Q. For whom?

19 A. Charlie Miranda.

20 Q. Is Charlie Miranda one of the council members --

21 A. Yes.

22 Q. -- at this time?

23 It reads, hey Mary, when you get a chance, could  
24 you give me a call. I'm trying to find a few minutes  
25 for Charlie and Ernie to discuss conversion therapy

1 before the March 2nd meeting.

2           Would this be the way that one of these meetings  
3 with an individual council member is set up by your  
4 office to discuss pending legislation?

5           A. Did you say would this be one of the ways? Is  
6 that your question or --

7           Q. Yes.

8           A. Yes.

9           Q. I take it you've never seen this particular  
10 message before?

11          A. No.

12          Q. Okay. So, as you sit here, you're -- strike  
13 that.

14                This would be consistent with the practice of  
15 your office in setting up meetings with individual  
16 council members to discuss pending legislation, correct?

17          A. This would be one of the ways that we would set  
18 up a meeting with a council member.

19          Q. Okay. What other ways might it be done?

20          A. Over the phone requesting a date. They may even  
21 just rely on the Outlook calendars that are publicly  
22 available and send an invite.

23          Q. So there's no policy that you only do it this way  
24 or you only do it another way?

25          A. Not that I'm aware of.

1 Q. Okay. We can move on.

2 (Plaintiffs' Exhibit No. 20 marked for identification)

3 BY MR. GANNAM:

4 Q. Show you a document that I'll mark as Exhibit 20.

5 This is marked as COT PRODUCTION 004832. It says, from

6 Tatiana Henao; dated February 13, 2017, to

7 Ernest Mueller; subject, conversion therapy, West Palm

8 Beach, Business Regulation. And there's an attachment.

9 Do you recognize this document?

10 A. I believe I do, yes.

11 Q. What is it, to your knowledge?

12 A. It's an e-mail.

13 Q. What is the -- the e-mail concerning -- or strike

14 that.

15 Does this concern the ordinance?

16 A. Yes.

17 Q. Who is Tatiana Henao?

18 A. She is a -- was a legal intern for the City.

19 Q. Is she still a legal intern with the City?

20 A. No.

21 Q. What was her involvement in the drafting of the

22 ordinance?

23 A. Ernie assigned research -- a couple of research

24 topics to her to look at.

25 Q. Are you familiar with why the West Palm Beach

1 Business Regulation Ordinance was being looked at in  
2 connection with Tampa's conversion therapy ordinance?

3 A. Yes.

4 Q. What was the purpose of that?

5 A. It was part of our discussion about overall  
6 enforcement methods.

7 Q. When you say, "our discussion," who are you  
8 talking about?

9 A. The legal department.

10 Q. And what was -- what was the -- what was that  
11 discussion about? Were different kinds of enforcement  
12 considered?

13 A. Yes.

14 Q. Well, what was considered?

15 A. Well, here, she was looking at what they call --  
16 what some people refer to as business operating permits,  
17 whether or not you could require a permit to engage in  
18 certain activity within the City; and then the  
19 enforcement mechanism then becomes revocation of the  
20 permit.

21 Q. And did the City consider or -- I'll ask you  
22 specifically. Did the City -- strike that. I'll start  
23 again.

24 Did the City of Tampa consider as an alternative  
25 to its conversion therapy ban instead creating some kind

1 of licensing or permitting scheme for providers of  
2 conversion therapy within the City of Tampa?

3 A. Again, your -- it gets to -- it's sort of the  
4 same issue that I had with the previous question about  
5 what it means to consider.

6 Q. Okay.

7 A. I don't really understand.

8 Q. Was there ever any formal request from the City  
9 Council to examine any alternative to the ban that was  
10 enacted, such as, for example, a licensing or permitting  
11 scheme that would apply to providers of conversion  
12 therapy?

13 A. No. We were not formally directed by the City  
14 Council to -- to consider a permitting scheme.

15 Q. And, in the general course of -- of researching  
16 and drafting legislation for the City Council, does the  
17 City Attorney's Office undertake research on its own  
18 initiative to look at alternatives to what the City  
19 Council has requested just as part of its  
20 responsibilities to the council?

21 A. We follow the professional rules of  
22 responsibility in advising an organizational client.  
23 And so that would mean providing advice on multiple  
24 facets, not just the legal issues, but what other issues  
25 that might be tangential to the -- the issue that's --

1 that's at hand. So...

2 Q. I don't know if you were in here when Council  
3 Member Maniscalco testified that, from his perspective,  
4 what he asked for was an ordinance comprehensively  
5 banning all conversion therapy; and that's what the City  
6 enacted. Who would have initiated this line of research  
7 or considered of let's look at permitting as a possible  
8 means of enforcement against conversion therapy?

9 A. Well, Ernest Mueller was the lead attorney  
10 responsible for presenting the ordinance. So he would  
11 have been the one directing the members of the legal  
12 department with various issues. Myself being an  
13 attorney, as well, I would have followed whatever lead  
14 that I felt was appropriate in order to give my client,  
15 the City, comprehensive advice.

16 Q. Was information about permitting or licensing  
17 included in the staff report, the initial staff report  
18 to the City Council?

19 A. I don't recall all of the specifics of what Ernie  
20 presented to the City Council. So I would -- I would  
21 just refer you to the -- to that public hearing for what  
22 was presented on that.

23 (Plaintiffs' Exhibit No. 21 marked for identification)

24 BY MR. GANNAM:

25 Q. Let's look at Exhibit 21. This is an e-mail

1 dated February 24 from Mr. Mueller to Tatiana Henao,  
2 subject, assignment. This was produced as COT  
3 PRODUCTION 004830. Do you recognize this e-mail?

4 A. Yes.

5 Q. And what's going on in this e-mail?

6 A. Ernie's giving an assignment to an intern.

7 Q. And what is the nature of that assignment?

8 A. To research whether including enforcement of the  
9 conversion therapy ordinance against religious  
10 organizations would violate the Religious Freedoms Act.

11 Q. And do you know whether Ms. Henao delivered an  
12 answer to Mr. Mueller on this question?

13 A. Yes.

14 Q. And what was the answer?

15 A. She provided a memo, and I believe the general  
16 answer was no.

17 Q. And was this information shared with the City  
18 Council?

19 A. Not to my knowledge.

20 Q. Was there a reason that information wasn't shared  
21 with the council?

22 A. I don't know if there was a reason. I would just  
23 say that, generally speaking, we don't provide  
24 information that they don't ask for or that we don't  
25 feel is pertinent and relevant to what they're asking us

1 to do. And, if we came to the decision that it was not  
2 going to violate that particular act, then we wouldn't  
3 discuss that with them if we didn't feel like it was  
4 going to be something that was going to be an issue,  
5 unless, of course, they thought it was an issue and  
6 asked us for it.

7 (Plaintiffs' Exhibit No. 22 marked for identification)

8 BY MR. GANNAM:

9 Q. Here's Exhibit 22. It's an e-mail from  
10 Jerrod Simpson dated February 27, 2017, to  
11 Ernest Mueller at Bates number COT PRODUCTION 004840.  
12 Do you recognize this communication?

13 A. Yes.

14 Q. And this is a -- an e-mail you sent to  
15 Mr. Mueller, correct?

16 A. Yes.

17 Q. It reads, looking at the literature from the  
18 professional communities, it seems that conversion  
19 therapy, in quotes, is a layman term and that the proper  
20 term would be sexual orientation change efforts, or  
21 SOCE, which is also referred to as reparation therapy or  
22 conversion therapy. I don't know if you want to change  
23 that or not.

24 Were you presenting this as a question to  
25 Ernest Mueller in connection with drafting the

1 ordinance?

2 A. Yes.

3 Q. And did he answer the question?

4 A. Not in an e-mail.

5 Q. Did he answer it in some other way?

6 A. We discussed it as part of our general  
7 discussion; and we ended up, obviously, keeping the  
8 conversion therapy being that that's the -- the term  
9 that's generally used even though, in the medical  
10 literature, it seems that sexual orientation change  
11 efforts was the more proper way to refer to it. But we  
12 feel like that was kind of covered in the definitions.

13 Q. What literature from the professional communities  
14 were you referring to?

15 A. The literature that's cited in the ordinance.

16 Q. Anything besides the literature cited in the  
17 ordinance?

18 A. No.

19 Q. The second paragraph reads, also I'm creating a  
20 k:drive folder where I'm saving all the resolutions from  
21 the various professional organizations that have  
22 formally opposed the practice.

23 First of all, what is a k:drive folder?

24 A. It's a shared network that everyone in the legal  
25 department has access to.

1 Q. And is that limited to the legal department?

2 A. I don't know.

3 Q. That's not a -- I guess what I'm getting at is  
4 there's not one k:drive for the whole City of Tampa,  
5 correct?

6 A. Correct. As far as I understand, there's -- I  
7 mean, I don't know -- I don't work for the Tech -- T&I  
8 department, Technology & Innovation department. So I  
9 can't speak to that. And it wasn't on the topics, so I  
10 didn't prepare myself on that subject. But --

11 Q. Okay.

12 A. -- the k:drive is a drive that everyone in the  
13 legal department can -- I can put a document in there,  
14 and anyone in the legal department can access it.

15 Q. Earlier when you talked about your file that you  
16 reviewed, you said that that was an electronic file. Is  
17 it located on the k:drive?

18 A. Yes.

19 Q. Now, when you said all the resolutions from the  
20 various professional organizations, is that synonymous  
21 with literature from the professional communities in the  
22 paragraph before?

23 A. Well, I don't know if it's synonymous. But just  
24 to say that the gist of what I was saying is that I was  
25 trying to obtain the literature that we were going to

1 rely on and put it in a file where Ernie and I could  
2 both access it. That was what I was trying to convey  
3 there.

4 Q. Okay. Is there any literature or resolution  
5 identified in the ordinance that's not covered by these  
6 two descriptions in this e-mail, being, literature from  
7 the professional communities and resolutions from the  
8 various --

9 A. I don't --

10 Q. -- professional organizations?

11 A. I'm sorry. I don't know.

12 Q. Did you read any professional literature or  
13 resolutions from professional organizations that did not  
14 end up being identified in the ordinance ultimately?

15 A. I guess you'll have to clarify that question for  
16 me. Like, organization, professional organiz -- like,  
17 what would be considered --

18 Q. Okay.

19 A. -- an organization?

20 Q. The ordinance recites several papers and studies  
21 and resolutions from various organizations like the  
22 American Psychological Association. Are you with me so  
23 far?

24 A. Uh-huh.

25 Q. I'm asking you did you personally read or look

1 for papers or studies or resolutions relating to  
2 conversion therapy that are not recited in the ordinance  
3 itself?

4 A. Yes.

5 Q. And what did you -- what did you look at in terms  
6 of literature that's not recited in the ordinance  
7 itself?

8 A. Well, I recall reading some -- maybe some news  
9 articles. I read a -- I think the White House had a  
10 position statement on the issue. I was looking for  
11 other -- other relevant literature. I don't know,  
12 again, what literature exactly -- what that means. But  
13 I was researching as part of the issue a number of  
14 things that were not ultimately references in the  
15 ordinance.

16 Q. And assuming those things were relevant to the  
17 issues covered by the ordinance, why were they not  
18 included in the recitals of the final ordinance?

19 A. We included everything that we felt was necessary  
20 to both establish the predicate, reenforce the  
21 compelling interest. If, in fact, the ordinance would  
22 be subject to strict scrutiny -- I don't know that we  
23 had a clear answer to that at the time -- but the  
24 whereas clauses would be part of establishing what the  
25 City, as a body, considered. And using that -- the term

Page 57

1 considered in the legal sense that, you know, we cited  
2 to it in the whereas clauses; therefore, it becomes part  
3 of the predicate of the ordinance. So we put what we  
4 felt was necessary in there. I don't think we -- I  
5 don't think we went above and beyond. We wouldn't cite  
6 to something that we didn't feel was necessary or  
7 helpful to what we were doing.

8 Q. Who ultimately had the authority to make that  
9 call as to whether a particular piece of literature went  
10 into the whereas clauses or didn't make it in there?

11 A. Well, the City Council, as a body, has control  
12 over the ordinances that they pass.

13 Q. Who would have had the authority to make the call  
14 as to whether it went into the draft that was first  
15 presented to the City Council?

16 A. Ernest Mueller would have been the one who would  
17 have, you know, signed off on what the document that was  
18 presented to City Council to consider.

19 (Plaintiffs' Exhibit No. 23 marked for identification)

20 BY MR. GANNAM:

21 Q. This is Exhibit 23. This is another e-mail from  
22 Jerrod Simpson to Ernest Mueller dated February 27,  
23 2017, Bates number COT PRODUCTION 004839. Do you  
24 recognize this e-mail?

25 A. Yes.

1 Q. What are you talking about in this e-mail?

2 A. Conversion therapy.

3 Q. And it refers, again, to all the policy  
4 statements from the various medical and professional  
5 organizations on conversion therapy. I placed them in  
6 my k:drive folder labeled conversion therapy. I can  
7 draft a much more robust set of whereas clauses with  
8 these than the other cities. Let me know if you'd like  
9 me to do that.

10 Did I read that correctly?

11 A. Yes.

12 Q. Did Mr. Mueller respond to your offer to draft  
13 more robust whereas clauses?

14 A. I don't recall whether he did or not.

15 Q. Did you, in fact, draft more robust whereas  
16 clauses than other cities had done?

17 A. Like I stated earlier, I believe that I may have  
18 added one additional whereas clause. But I don't recall  
19 specifically which -- which one that I -- that I added.

20 Q. Which other cities did you have in mind when you  
21 wrote this e-mail?

22 A. The ones -- the cities that we were -- that we  
23 had -- looked at for ordinances that we had already were  
24 kind of looking at as sort of a template to follow,  
25 which would be Palm Beach County, Miami Beach. There's

1 another one that I can't remember right now off the top  
2 of my head.

3 Q. Okay. But it was more than two?

4 A. Yeah. I think there were three or four  
5 ordinances that had been passed. There were also the  
6 two state -- statewide bans in California and  
7 New Jersey. All of those things were things that we  
8 were looking at for the model language.

9 Q. In terms of the whereas clauses in the other  
10 cities' ordinances that you had looked at, were they  
11 generally the same in those other cities as compared to  
12 each other?

13 A. Generally, yes. I think all the ordinances were  
14 -- yeah, even the state bills themselves were very --  
15 were generally similar in their definitions of  
16 conversion therapy and the language of the ban, the  
17 actual prohibition language.

18 Q. And, having reviewed those other cities' whereas  
19 clauses, did you conclude that there was a need for  
20 Tampa's ordinance to have a more robust set of whereas  
21 clauses?

22 A. No.

23 Q. Why did you offer to draft more robust whereas  
24 clauses?

25 A. Well, because the whereas clauses, again, they're

Page 60

1 kind of -- they act as the legislative findings of the  
2 body. And if we -- if the City Council wanted to have a  
3 more extensive set of findings -- there's much more  
4 information in the literature that we were citing than  
5 what we quote -- in what we ultimately quoted. So  
6 those -- we could have put more information from the  
7 literature in there which could have further I guess  
8 just reiterated our predicate and also help to guide the  
9 intents and purposes portions of the ordinance for the  
10 administration that we -- once they begin to enforce the  
11 ordinance.

12 Q. Can you give me an example of the kind of  
13 information that you had in mind that you could have  
14 included in the whereas clauses?

15 A. No.

16 Q. Did you have something specific in mind when you  
17 wrote this e-mail?

18 A. Not to my recollection.

19 Q. At the end of the day, when Tampa's ordinance was  
20 enacted, did its whereas clauses look similar to the  
21 whereas clauses of the other cities in Florida that had  
22 already enacted ordinances?

23 A. Generally speaking, yes. We kept most of the  
24 language that was included in the other ordinances.

25 MR. GANNAM: Why don't we take a break, a

1 comfort break. We'll try to come back soon.

2 (Recess)

3 BY MR. GANNAM:

4 Q. Mr. Simpson, can you get Exhibit 4, the ordinance  
5 itself, back in front of you, please.

6 A. I have it.

7 Q. Let's talk about what's actually prohibited by  
8 this ordinance. Can we go to the definitions on page  
9 five. So this reads: "Conversion therapy or reparative  
10 therapy means, interchangeably, any counseling, practice  
11 for treatment performed with the goal of changing an  
12 individual's sexual orientation or gender identity."

13 I'm going to stop there. Did I read that  
14 correctly?

15 A. Yes.

16 Q. So, when it says performed with the goal of  
17 changing an individual's sexual orientation or gender  
18 identity, whose goal is relevant to determining whether  
19 a violation of this ordinance has occurred? And when I  
20 say, "whose," I mean, the provider's goal or the  
21 client's goal?

22 A. The provider's.

23 Q. So, if a provider of counseling or therapy has no  
24 particular goal at all regarding changing an  
25 individual's sexual orientation or gender identity by a

Page 62

1 client presents to that provider -- and let's say it's  
2 a teen-age boy -- and he tells the provider, I would  
3 like to change my sexual orientation because I don't  
4 like my -- my attraction to -- my same-sex attraction.  
5 If the counselor obliges the client, obliges the  
6 client's goal, that is, has the provider violated the  
7 ordinance?

8 MR. WILLIAMS: Object to the form of the  
9 question as being overly broad and imprecise. And, to  
10 the extent that it purports to be a hypothetical, it's  
11 incomplete and improper.

12 You may give it your best shot, Mr. Simpson.

13 THE WITNESS: Well, yeah, I mean, I -- if he  
14 hadn't objected, I would have just pointed out a few  
15 points of confusion that I have with your question. But  
16 one of the issues that I have with your question is that  
17 it seems that you seem to be isolating -- isolating the  
18 goal as if -- as if the -- when the patient comes to the  
19 provider with a goal and then the -- from your hypo, it  
20 sounded almost like the provider would then adopt that  
21 goal and then carry forward with the therapy. So that's  
22 what I'm -- I'm a little unclear with the way that you  
23 present the hypothetical, whether or not in your -- in  
24 your scenario, that the provider is then adopting that  
25 goal.

1 BY MR. GANNAM:

2 Q. I think you've identified the crux of the issue.  
3 So I'll ask it, again. Maybe try to clarify.

4 If the provider's goal is simply to accommodate  
5 whatever the client wants and -- let me back up.

6 If the provider's goal is to accommodate whatever  
7 the client wants to relieve, whatever distress the  
8 client is experiencing, and the client presents with the  
9 goal expressed to the provider that I want to change my  
10 sexual orientation, will you help me, does -- is it the  
11 City's position that, if the provider then obliges that  
12 client, that it then becomes the provider's goal to  
13 change the child's sexual orientation and, therefore, is  
14 violating the ordinance?

15 MR. WILLIAMS: Same objection.

16 I'll use the phrase same objection to refer  
17 to the objection that I made to the prior question.  
18 That might save some time.

19 THE WITNESS: I mean, there's a lot of --  
20 just to flat answer your question, no, that the City  
21 would not assume one thing or another based on the hypo  
22 as you present it. There's going to be a lot of facts  
23 in any of these cases. And the City would have to look  
24 at all the totality of the circumstances to determine to  
25 what extent there was coercion or what goals were had,

Page 64

1 what was consented, what wasn't consented to. So I  
2 don't think that I -- based on how you present it, that  
3 I could take a position as to whether or not that would  
4 be the goal of the provider.

5 BY MR. GANNAM:

6 Q. Now, when I read the ordinance, I don't see the  
7 word coercion or consent in this definition of  
8 conversion therapy. So my question would be: What do  
9 those concepts have to do with whether a provider is  
10 violating this ordinance or not?

11 A. What does coercion and client consent have to do  
12 with the violation of the ordinance?

13 Q. Right.

14 A. Well, I mean, if you look at -- I'll just refer  
15 you to the definitions here. It says that conversion  
16 therapy -- in the definition of conversion therapy or  
17 reparative therapy it says that it does not include  
18 counseling that provides support and assistance to a  
19 person undergoing gender transition or counseling that  
20 provides acceptance, support and understanding of a  
21 person or facilitates a person's coping, social support  
22 and development.

23 So I'm a little confused in the context that  
24 you're presenting to me of whether or not the therapist  
25 is providing that acceptance support and understanding,

1 social support and development or if they're providing  
2 therapy that is seeking to change sexual orientation.

3 Q. In the example I gave you, the -- as I said, the  
4 provider does not have a predetermined goal when the  
5 client enters the office. The therapist or the  
6 provider -- the provider's only goal is to accommodate  
7 whatever help the client wants. And so the client  
8 expresses a desire to change sexual orientation. And  
9 the therapist is -- you know, supports and accepts and  
10 affirms that goal of the client. Is that -- is that  
11 therapist going to violate this ordinance by giving the  
12 client the therapy or the help that the client wants?

13 A. I mean, I take a little -- I just still can't  
14 really understand your question. But I'll try to answer  
15 it another way and see if I can give you something that  
16 you -- that you find acceptable.

17 MR. WILLIAMS: Subject to my same objection,  
18 by the way.

19 Go ahead, please.

20 THE WITNESS: If the goal of the treatment  
21 is to change the sexual orientation, whether that is the  
22 goal from the outset or at the moment that that becomes  
23 the goal, that -- then that creates a violation of the  
24 ordinance as it's written. So if the client -- or the  
25 patient comes in and then articulates a goal and then it

1 becomes the therapist's goal to change the patient's --  
2 the therapist is the one who's subject to violating the  
3 ordinance, not the patient. So it's the goal of the  
4 therapy that they're providing. They're the one that  
5 would be the potential violators. So, once it becomes  
6 their goal to change sexual orientation or gender  
7 identity, then it becomes a violation of the ordinance.

8 BY MR. GANNAM:

9 Q. So, if the City determines that the therapist has  
10 adopted the client's goal of changing sexual orientation  
11 or gender identity, then it's the therapist at that  
12 point is subject to liability under the ordinance for  
13 providing therapy the goal of which is to change sexual  
14 orientation or gender identity?

15 A. If the therapist has adopted the goal of changing  
16 sexual orientation or gender identity, then they have  
17 violated the ordinance.

18 Q. And, just to clarify, that would be true even if  
19 the goal initially came from the client's request and  
20 not -- and was not initiated by the therapist?

21 A. Yes.

22 Q. Give you a little bit different scenario.  
23 Suppose a prepubertal child about ten years old who was  
24 born biologically as a boy but has expressed a female  
25 gender identity, does the ordinance prohibit a therapist

Page 67

1 from encouraging that child to embrace, you know, his  
2 given male body and to align with a male gender role?

3 A. I can only speak to the -- your kind of  
4 paraphrasing the definitions and the terms of art within  
5 the ordinance. And so I don't think that they're really  
6 -- the terms that are chosen in the ordinance were  
7 chosen for a reason. So I don't know that I would  
8 characterize it like that. I'm not sure I understand  
9 exactly what you're asking also. If you could rephrase,  
10 maybe I can understand.

11 Q. Yeah. I'll break it up. So we start with a  
12 ten-year-old boy. Okay? Are you following me so far?

13 A. Right.

14 Q. And, when I say, "a ten-year-old boy," born  
15 biologically as a boy. So far so good?

16 A. Uh-huh.

17 Q. But that boy has expressed a female gender  
18 identity. Are you with me?

19 A. Not entirely. I mean, what do you mean by that?

20 Q. Well, what does gender identity mean in this  
21 ordinance?

22 A. Gender identity isn't defined in the ordinance.

23 Q. How does the City interpret it?

24 A. The City would interpret it based on Webster's  
25 Ninth Dictionary.

1 Q. And what does Webster's Ninth Dictionary say?

2 A. I don't know off the top of my head. But I -- if  
3 you want to pull it up, we can look at it.

4 Q. I'm asking you, you know, as the City's designee  
5 to answer questions about interpretation of the  
6 ordinance.

7 A. Right.

8 Q. So, as we sit here right now, do you know how the  
9 City would interpret gender identity as that term is  
10 used in this ordinance?

11 A. Based on Webster's Ninth Edition.

12 Q. Is that something you've looked at before?

13 A. I have not looked -- I mean, I think, at some  
14 point, I looked at the definition of gender identity in  
15 Webster's Ninth. But I can't recall -- you know, I  
16 can't recite to you what Webster's Ninth says about  
17 gender identity.

18 Q. And who at the City has determined that -- I'll  
19 start over. Who at the City determined that the  
20 definition of gender identity in Webster's Ninth  
21 Dictionary is the controlling definition for purposes of  
22 this ordinance?

23 A. Well, in the general provisions of the City's  
24 code, if a term is not defined within a chapter  
25 specifically or within an ordinance or wherever the term

1 might be defined more specifically, if the term isn't  
2 defined in one of those ways, then, under our default  
3 general provisions, it would default to the Webster's  
4 Ninth definition.

5 Q. That's provided explicitly in the City ordinance  
6 code?

7 A. Yeah. I believe it's Chapter 1, somewhere in  
8 Chapter 1.

9 Q. Do you know whether what's considered the  
10 Webster's Ninth Dictionary is -- it's the same as what  
11 would be available on the merriam-webster.com internet  
12 site?

13 A. No, I don't know.

14 Q. So, as the City's designee to answer questions  
15 regarding interpretation of the ordinance and also  
16 enforcement of the ordinance, did you review this  
17 definition prior to your testimony today? That is, the  
18 definition of gender identity.

19 A. Of gender identity? Yes, at some point, I've  
20 reviewed the Webster definition in preparation for this.  
21 But I can't say again -- I can't recite the definition  
22 with precision.

23 Q. As you sit here today, you can't recite what that  
24 definition is?

25 A. Well, I can't -- yeah, I can't verbatim recite to

1 you what the definition in Webster's is.

2 Q. So, as we sit here right now, do you -- do you  
3 recall enough of the definition to be able to answer my  
4 question about how does the City identify gender --  
5 define gender identity as that term is used in this  
6 ordinance?

7 A. Yeah. I mean, I can generally talk about gender  
8 identity. But, again, I would just say that the  
9 definition would be -- that the City would rely on in  
10 making a determination of a violation would be -- we  
11 would look to the dictionary definition in Webster's  
12 Ninth.

13 And then also, ultimately, it would be a question  
14 of interpretation for the administrative official who  
15 would consult with me to look at the facts, the totality  
16 of the facts. We don't parse out specific facts in most  
17 cases in determining whether to move forward with a  
18 case. So the official would determine based on the  
19 totality of the circumstances and with guidance from  
20 legal and the dictionary definition to determine what  
21 that meant and whether or not it would -- whether or not  
22 the facts that we were looking at constituted a  
23 violation of the ordinance.

24 Q. Are there any other terms in this -- in the  
25 ordinance that you would have to resort to Webster's

1 Ninth Dictionary for the definition of in order to  
2 continue answering questions about the City's  
3 interpretation of the ordinance?

4 A. I don't know -- I mean, I don't know to what  
5 extent you're going -- what terms you're going to ask me  
6 about and which ones you aren't. The only reason --

7 Q. How about sexual orientation?

8 A. I guess it depends on how you ask it. I mean,  
9 the only reason I refer to the dictionary in the context  
10 of the question that you asked is because the way that  
11 you asked it was unclear to me what exactly you meant  
12 when you were referring to expression of gender  
13 identity.

14 Q. So, going back to this hypothetical that we  
15 began, if we have a ten-year-old biological boy who has  
16 expressed a female gender identity -- meaning, however  
17 the City defines gender identity -- would the ordinance  
18 prohibit a therapist from encouraging that child who  
19 expresses a female gender identity to embrace the  
20 child's biological male body and to align with the --  
21 with a male gender role?

22 MR. WILLIAMS: Object to the form.

23 Overly vague, improper hypothetical.

24 THE WITNESS: If the -- when you say  
25 encouragement, if it -- when you refer to encouragement,

1 if what you're saying is that the therapist was  
2 providing therapy with a goal of changing the gender  
3 identity, then that would be a violation.

4 BY MR. GANNAM:

5 Q. What if that is not the therapist's goal but,  
6 nonetheless, encourages this biological boy who  
7 identifies as female to embrace the child's male body  
8 and to align with the child's male gender role?

9 MR. WILLIAMS: Same objection.

10 I'll add that the hypothetical, as worded by  
11 counsel, also includes a conclusion without a factual  
12 foundation, thereby makes the hypothetical even more  
13 incomplete and, therefore, improper.

14 Please answer the question, if you can.

15 THE WITNESS: The ordinance says that it's a  
16 practice or treatment performed with the goal of  
17 changing an individual's sexual orientation or gender  
18 identity. So the therapy -- and I read that to mean  
19 that the conversion therapy as defined by the ordinance  
20 is a therapy, practice or treatment that has to have the  
21 goal of changing the orientation or the gender identity.  
22 So encouragement of something is different. Those are  
23 different words. So I'd -- I don't know how to answer  
24 you other than to repeat -- I don't mean to go back and  
25 forth. I don't want to make this difficult. But the

1 ordinance is pretty clear in the terms that it uses.

2 And it does say performed with the goal of changing.

3 BY MR. GANNAM:

4 Q. In the context of enforcement, if the only  
5 information that the City received was -- in a complaint  
6 was the hypothetical that I gave you that a ten-year-old  
7 biological boy who identifies as a female went to a  
8 therapist or a counselor and that counselor encouraged  
9 the child to embrace his male biological body and to  
10 align with his -- with a male gender role, if that was  
11 the only information you received from the complaint,  
12 how would the City go about determining whether a  
13 violation had occurred?

14 A. Well, how the City pursued a complaint or  
15 investigated a complaint would be dependent on the  
16 source of the complaint, the nature of the complaint.  
17 If what you said -- what you're asking me doesn't  
18 include a source, so I don't know if you want to help me  
19 there.

20 Q. Why does that matter?

21 A. Because the -- you have to follow the lead. If  
22 an anonymous complaint came in, then, you know, I don't  
23 know where -- where -- in your question, I mean, I  
24 don't -- there's a lot of things that I have to assume  
25 in order to answer your question. So that's why I can't

1 really answer it precisely.

2 Q. If the complainant is not anonymous but known to  
3 the City, what would the City -- how would the City  
4 respond to the complainant?

5 A. We have a known complainant?

6 Q. Right.

7 A. Okay. I don't -- yeah. I don't think that that  
8 necessarily would have an affect, whether the  
9 complainant was known or not, unless the -- what would  
10 be more relevant is how close the complainant was to the  
11 situation that they're complaining about. If an  
12 anonymous complaint came in from a patient, for example,  
13 that might change the circumstances as opposed to an  
14 anonymous complaint that doesn't identify any context of  
15 how the information was obtained or whether it was  
16 hearsay or firsthand or how they knew about what they --  
17 what they were complaining about. All those things  
18 would be considered when we looked at -- when we would  
19 look at a complaint for enforcement purposes.

20 Q. Suppose the complaint came from a -- from a next  
21 door neighbor who told the City that he was -- you know,  
22 had been told by the child everything that had happened,  
23 what would be the City's response?

24 A. Well, I -- it would be up to the -- to the Code  
25 Enforcement department to decide, within their

1 prosecutorial discretion, whether or not they would want  
2 to pursue the complaint if they felt that it was -- it  
3 had the -- the veracity and the -- you know, all the  
4 prosecutorial decisions that any law enforcement officer  
5 would make for beginning an investigation. They would  
6 consider all of those things and then make a decision  
7 based on all of those -- all of those considerations.

8 Q. In your review of the literature, did you come  
9 across -- strike that.

10 In your review of the various literature,  
11 studies, et cetera, that are recited in the ordinance,  
12 did you see information regarding how common is it for  
13 a -- a prepubertal child who experiences some kind of  
14 gender dysphoria to essentially outgrow that or for that  
15 gender dysphoria to desist once that child reached a  
16 certain age?

17 A. I recall something of that being discussed, but I  
18 don't know specifically. I'm happy to -- if you're  
19 thinking of something specific, I'm happy to look at it  
20 to refresh.

21 Q. Let me ask you this. If a -- using a similar  
22 hypothetical, if this ten-year-old biological boy who  
23 was experiencing gender dysphoria to the extent that he  
24 had adopted a female gender identity sees a provider and  
25 that provider believes that it's in the child's best

1 interest to speed up the desistance of that gender  
2 dysphoria, in other words, to speed up the process where  
3 that child would revert back to his biological gender  
4 identity because the provider believes that that's  
5 usually what happens, if the provider provides that kind  
6 of help to speed up the desistance of the cross-gender  
7 identity or the cross-gender feelings, would that be  
8 considered a violation of the ordinance?

9 A. If the provider is providing support in a  
10 sexual -- in a neutral intervention, is what the  
11 ordinance uses, then it would not be a violation. If  
12 they're helping the child cope with or manage these  
13 feelings in a neutral way without -- without a goal in  
14 mind of changing the identity, then that's not a  
15 violation.

16 Q. What if the provider's goal is to simply speed up  
17 what the provider believes is going to happen anyway and  
18 actually encourages this -- this biological boy who  
19 identifies as a girl to focus on male behaviors and male  
20 gender roles, would that be a violation of the  
21 ordinance?

22 MR. WILLIAMS: Same objection.

23 THE WITNESS: I don't think that there are  
24 specific behaviors -- the City hasn't identified  
25 specific behaviors that define gender identity. Again,

Page 77

1 I can't recite to you verbatim the dictionary definition  
2 of gender identity; but I can tell you with certainty  
3 that that dictionary definition does not include a list  
4 of specific behaviors that meet the term gender  
5 identity. So I just -- I keep finding myself a little  
6 bit confused by your hypotheticals because they seem to  
7 be predicated on the specific behaviors; whereas, I  
8 think gender identity is probably a little bit broader  
9 than a specific thing like boys wear blue or, you know,  
10 I have a purple tie. I don't think that has anything to  
11 do with my gender identity under the ordinance.

12 BY MR. GANNAM:

13 Q. What if the therapist's goal in the hypothetical  
14 I gave is simply to cause the desistance of the child  
15 identifying as a girl?

16 A. Can you repeat that? I'm sorry.

17 Q. The goal of the therapist is to bring about the  
18 desistance of the child identifying as a girl.

19 A. The goal of the therapy -- just to use a  
20 different word than desistance because I'm not familiar  
21 with that term -- is to end the identification of the  
22 child with the opposite -- with a different -- with a  
23 different gender than the biological gender? Is that  
24 your question?

25 Q. Yes.

1           A. Yeah. If the goal is to change the -- the gender  
2 identification, then that's a violation.

3           Q. Just so I don't have to show the Court all these  
4 pages -- because I know we've gone back and forth. And,  
5 fair enough, you've asked me to clarify. Just to kind  
6 of reset the hypothetical, if the ten-year-old  
7 biological boy identifies as a girl and presents to a  
8 therapist and the therapist's goal is to -- is to end  
9 the boy's identifying as a girl so that he, again,  
10 identifies as his biological sex and the therapist  
11 accomplishes this by encouraging the boy to do boy  
12 things or to act like a boy, however that is envisioned  
13 by the therapist, would that be a violation of the  
14 ordinance?

15           A. Yes. The goal to change identity would be the  
16 violation. If the City were enforcing it, obviously, it  
17 would have to use specific instances of facts that were  
18 evidence of that -- of that goal.

19           Q. Let's use a different hypothetical. Suppose  
20 there is a -- a teen-age girl. Say she's sixteen years  
21 old. And when I say, "teen-age girl" -- strike that.

22                       Suppose we have a sixteen-year-old biological  
23 girl who, for some period of time, has been identifying  
24 as a boy, has adopted a male gender identity, and that  
25 child presents to a therapist and expresses to the

Page 79

1 therapist, I've been living as a boy for some time, I  
2 don't want to anymore, I want to change back to my  
3 biological female gender identity I was born with, will  
4 you help me and the therapist agrees to help and engages  
5 in therapy to -- to help that child readopt or return to  
6 a female gender identity that aligns with her biological  
7 sex, would that be a violation of the ordinance?

8 MR. WILLIAMS: Incomplete hypothetical, so I  
9 object. And an improper hypothetical as worded.

10 But you may give it your best shot.

11 THE WITNESS: I'm not sure I understand the  
12 distinction that you're -- between this hypothetical and  
13 the last hypothetical. The only difference that I  
14 understand -- maybe you can clarify for me -- is that,  
15 in your previous hypothetical, one was biologically a  
16 boy and then now, in this hypothetical, one was  
17 biologically a girl. Are those the only things that you  
18 changed in the hypothetical?

19 BY MR. GANNAM:

20 Q. Well, maybe. Maybe not. I just want you to  
21 answer the one I asked you. Do you want me to say it  
22 again?

23 MR. WILLIAMS: Let's have her read it back.

24 THE WITNESS: Yeah. That would be good.

25 MR. GANNAM: Okay.

1 (Requested portion read back by the court reporter)

2 MR. WILLIAMS: Note my continuing objection.

3 Go ahead.

4 THE WITNESS: Yeah. There's -- there's  
5 still an issue with your -- because your hypos are so  
6 limited in what you're presenting to me. There's an  
7 issue of what's -- you know, what's changing and what  
8 the goals are.

9 But, again, if the goal is -- if a female  
10 patient comes in and presents a goal of changing her  
11 gender identity, the therapist adopts the goal and then  
12 provides treatment with the goal of changing the  
13 identity, then that would be a violation of the  
14 ordinance.

15 BY MR. GANNAM:

16 Q. And, just so I'm clear, the answer is the same  
17 that, if the goal is to change gender identity, it's a  
18 violation of the ordinance even in the case of a -- of a  
19 child who has once, apart from this therapist, changed  
20 gender identity and now comes to the therapist to change  
21 back to a prior gender identity? It's still a violation  
22 if changing gender identity is the goal?

23 A. I think that, you know, there is -- yeah, I mean,  
24 I think the ordinance is pretty clear. If the goal is  
25 to change an individual's sexual orientation or gender

1 identity, then that's what the ordinance bans.

2 I'll just, you know, volunteer to you some  
3 information that the -- which is totally not what my  
4 lawyers told me to ever do in this deposition. But the  
5 literature does talk about, you know, these -- I think  
6 you used the term gender dysphoria. And, you know,  
7 it's -- the whereas clauses would also guide the  
8 decision of making a determination of whether or not  
9 there's a violation that would be prosecuted. And part  
10 of the whereas clauses -- and I'll just kind of point  
11 you to some of the ones that I think are kind of  
12 relevant to the hypos that you're presenting to me right  
13 now are -- basically, the very first one where it says  
14 that: Major professional -- and I'm on page one of the  
15 ordinance 2017-47. And this is page one of your Exhibit  
16 4. And, it says: As recognized by major professional  
17 associations of health practitioners and researchers in  
18 the United States and elsewhere -- and I'll just skip  
19 forward there -- lesbian, gay, bisexual, transgender or  
20 gender nonconforming or questioning is not a mental  
21 disease, disorder or illness, deficiency or shortcoming.  
22 So I think that's an important predicate, as well, that  
23 would guide the decision in defining what the goals of  
24 the therapy were.

25 Q. How does what you just read to me relate to the

1 prior hypothetical?

2 A. In defining how -- what the goal is.

3 Q. And, just so I'm being clear, the goal in the  
4 hypothetical was to help this -- this child change her  
5 gender identity to female from male in accordance with  
6 her desires. But it's given that it is the goal of the  
7 therapy to change gender identity. So I believe your  
8 answer was that would be a violation of the ordinance  
9 because the goal is to change gender identity. Am I  
10 correct?

11 A. Right. And what I'm saying is trying to just add  
12 a little bit of nuance to your basic hypothetical  
13 that -- that with the goal being to change the gender  
14 identity. And the ordinance references that any of  
15 these nonbinary -- just to use that term -- any of these  
16 nonbinary identifications, that those are not mental  
17 diseases. They're not disorders or illnesses or  
18 deficiencies or shortcomings.

19 Q. In my hypothetical, I did not -- I did not  
20 provide that anyone claimed that the gender identity or  
21 the desired gender identity of the client was somehow a  
22 mental disease or disorder or illness. I simply said  
23 that the client wanted to change it.

24 And so to what -- how is this information that  
25 you're providing or that you're reading to me from the

1 first recital relevant to the determination of whether a  
2 change requested by the client and adopted by the  
3 therapist violates the ordinance or not?

4 A. Well, all the whereas clauses are going to be  
5 relevant as part of the ordinance in determining whether  
6 or not a violation of the ordinance has occurred. So  
7 this would be part of the consideration in trying to  
8 determine what the goal of the therapy was. It's fine,  
9 I guess, for a law school exam to just assume certain  
10 things. But we don't have the luxury of doing that in  
11 the enforcement world. So, when we determine what the  
12 goal is, we have to look at whether or not these things  
13 were considered and -- and why the patients were -- the  
14 patient was in that position and why the therapist  
15 was -- what their goal was.

16 These -- the whereas clauses lay out all of that  
17 both as a predicate for why conversion therapy is  
18 harmful and presents a serious critical health risk to  
19 youth, but also I think, as what the predicate for most  
20 conversion therapy is based on, I think the literature  
21 talks about that where it says -- in fact, I'll just  
22 cite to you the whereas clause number three where it  
23 says, the American Psychiatric Association published in  
24 opposition to any psychiatric treatment including  
25 reparative or conversion therapy which therapy regime is

1 based on the assumption that homosexuality is a mental  
2 disorder, per se, and that a patient should change his  
3 or her homosexual orientation. So the whereas clauses  
4 lay that out for us, and that's part of our  
5 consideration when we determine whether or not there's a  
6 violation.

7 Q. So, in my hypothetical, neither the therapist nor  
8 the client expressed any position on whether or not the  
9 gender identity that the client desired had anything to  
10 do with a mental disease, disorder or illness or  
11 deficiency or shortcoming but only that it was the --  
12 the therapist's desire to provide the client what the  
13 client wanted. And what the client wanted is to change  
14 gender identity to match her biological sex.

15 So, based on that hypothetical -- and I believe  
16 your answer was, if the goal was to change gender  
17 identity, then it's a violation of the ordinance. I  
18 don't think I understand what you're telling me from  
19 these recitals this idea that some people think -- might  
20 think gender identity or homosexuality is a result of a  
21 mental disease, disorder or illness. I don't see where  
22 those enter into the determination of whether the goal  
23 was to change gender identity.

24 Is there anything else you can tell me as to how  
25 -- how these concepts, you know, fit together?

Page 85

1 MR. WILLIAMS: Which concepts specifically?

2 MR. GANNAM: The concepts expressed in these  
3 recitals that certain organizations reject the idea that  
4 being LGBTQ is somehow a mental disease, disorder,  
5 illness, deficiency or shortcoming as one set of  
6 concepts. On the other hand, what the ordinance  
7 prohibits, which is therapy the goal of which is to  
8 change gender identity.

9 MR. WILLIAMS: If you understand the  
10 question, Mr. Simpson, feel free to try.

11 THE WITNESS: Not entirely. But I'll try to  
12 answer and just say that the literature that we cite in  
13 the whereas clauses is also relevant in determining what  
14 the ordinance means. And so it's important because --  
15 first of all, because we -- we cite to it; and we say  
16 that it's important. And it's important of where I  
17 think the literature is saying that these therapies are  
18 misguided because they're predicated often on this idea  
19 that homosexuality is a mental disorder. And so they're  
20 relevant in that sense.

21 And so, you know, with your hypothetical --  
22 I'm trying to answer your hypothetical. But, again, in  
23 any enforcement situation, the City would look at the  
24 totality of the facts, every fact that we could find  
25 relevant to the situation. And then we would determine

1 whether or not we thought it was a violation and then,  
2 secondly, what action that we would take after that if  
3 we determined that there was probable cause for a  
4 violation.

5 BY MR. GANNAM:

6 Q. Okay. So, with that in mind then, if we simply  
7 take that off of the table where neither the therapist  
8 nor the client believes that the client's identification  
9 as a boy for some period of time is the result of any  
10 mental disease, disorder or illness, deficiency or  
11 shortcoming, neither the therapist nor the client  
12 believes that, and the therapist's only goal is to give  
13 the client what the client wants and the client's only  
14 goal is to return to a female gender identity that the  
15 client believes will -- she will like better and will be  
16 more comfortable with, in that scenario, is it correct  
17 that the City would consider that to be a violation of  
18 the ordinance for the therapist to provide therapy that  
19 the goal of which is to accomplish that change?

20 MR. WILLIAMS: Same objection.

21 Incomplete and incompetent hypothetical,  
22 involving too many assumptions.

23 That's my objection. Please answer, if you  
24 can.

25 THE WITNESS: The answer is the same that,

1 if the therapist is providing therapy that is -- has the  
2 goal of changing the gender identification, then that --  
3 that constitutes a violation of the ordinance.

4 BY MR. GANNAM:

5 Q. And, to follow up, is it the City's position that  
6 its enforcement decision -- or strike that.

7 Is it the City's position that whether a  
8 violation of the ordinance has occurred depends on  
9 whether the therapist subjectively believes that a  
10 nonconforming gender identity or homosexuality is  
11 somehow a deficiency or something that -- that the  
12 patient should desire to change compared to a therapist  
13 who doesn't believe those things? So just, if I can  
14 recap, is it the City's position that whether a  
15 violation has occurred depends on the -- the state of  
16 mind of the therapist in terms of whether they believe  
17 any of these things that are highlighted in the first  
18 and third recitals?

19 A. I think that you could read a certain mens rea,  
20 if you will, requirement into a violation of the  
21 ordinance that there would be some -- the City would  
22 need to provide facts, obviously, in any enforcement  
23 action to show what the goal of the therapy was because  
24 the ordinance is clear that the goal has to be to change  
25 the identity . So the City would need some facts that

1 were relevant to establishing that goal. And those  
2 facts could, I think, include facts that the City could  
3 have obtained within the legal restrictions on the City  
4 for gathering evidence that were relevant to the state  
5 of mind of the therapist when providing the therapy.  
6 Those would be relevant to what the goal was and whether  
7 or not a violation occurred.

8 Q. Would those facts that are considered relevant by  
9 the City include prior speeches or writings by the  
10 therapist that touch on the subjects of the first and  
11 third recitals in the ordinance?

12 A. I think that those facts, to the extent that they  
13 were -- you know, subject to the rules of evidence and  
14 the rules of evidence gathering by the City, those  
15 things could be relevant to the state of mind of the --  
16 of the alleged violator, potential violator.

17 (Recess)

18 BY MR. GANNAM:

19 Q. I think I asked you a little bit about this  
20 earlier, but I want to explore it a little. Council  
21 Member Maniscalco by motion asked for a staff report on  
22 a ban of all types of conversion therapy; is that  
23 correct?

24 A. As I recall, the motion just said generally a ban  
25 on conversion therapy . He didn't elaborate what he

1 meant by conversion therapy. He directed us to look at  
2 -- I believe it was the City of Miami Beach for  
3 clarification on what he -- what he meant by that.

4 Q. Okay. And I don't know if you were in the room  
5 for the discussion of aversive versus non-aversive  
6 therapies to change sexual orientation or gender  
7 identity. Do you understand what I'm talking about --

8 A. Yes. I was in the room for that.

9 Q. Were you in here when we talked about coercive  
10 and involuntary therapy versus voluntary therapy?

11 A. I believe I was. I do recall some discussion  
12 that you had with him about that.

13 Q. So I just want to ask. At anytime from the  
14 initial request for a staff report regarding a ban on  
15 conversion therapy through the enactment of the  
16 ordinance that was enacted, did the council as a whole  
17 consider banning something less than all conversion  
18 therapy, for example, banning only aversive types of  
19 therapy?

20 A. To the extent that those topics are covered in  
21 the literature, it was -- it was considered.

22 Q. Okay. But did any -- did the council ever ask  
23 the legal department to prepare a draft of an  
24 alternative ordinance that only covered aversive  
25 therapy?

1 A. No.

2 Q. Did the council ever ask the legal department to  
3 draft an ordinance that would only prohibit coercive or  
4 involuntary types of therapy?

5 A. No.

6 Q. Could the legal department have done that if  
7 asked to do that?

8 A. I don't know. I have -- I haven't considered  
9 that.

10 Q. Generally speaking, is there any -- is there any  
11 reason why the legal department would not have been able  
12 to draft a different ordinance if asked to do so by the  
13 council?

14 A. The legal department could have drafted a  
15 different ordinance, yeah.

16 Q. And, for example, could the legal department have  
17 drafted an ordinance that only banned aversive therapy  
18 or only banned coercive types of therapy?

19 A. I don't know the answer to that. I mean, the  
20 legal department drafted what we were directed to draft,  
21 which was a ban on conversion therapy. We were directed  
22 to follow a model for guidance and clarification on what  
23 the council member intended. That model included  
24 references to quite a bit of literature that does  
25 discuss aversive versus non. And, ultimately, what

1 happened was that the City banned conversion therapy;  
2 and that would include all forms of it, whether it's  
3 talk therapy or aversive.

4 Q. So do you know of any reason, as we sit here  
5 today, why the legal department would not have been able  
6 to draft an ordinance that only banned aversive therapy  
7 or that only banned coercive therapy?

8 MR. WILLIAMS: If asked, you mean?

9 BY MR. GANNAM:

10 Q. If asked to could so?

11 A. Well, there would be some question, I suppose, in  
12 whether or not the -- in relying on the literature that  
13 the City relied on, whether or not the goal was  
14 accomplished in eliminating -- or attempting to deter  
15 what the City has determined to be a harmful practice  
16 that presents a significant risk of harm to youth. And  
17 so because the literature doesn't -- doesn't really  
18 properly distinguish in a way that would be something  
19 that the City could rely on, I'm not sure. I don't know  
20 the answer to that because we would have to -- I guess  
21 we would have to find other literature that supports  
22 what you're saying. The literature, as I understand it,  
23 includes all types of conversion therapy; and that was  
24 the literature that the City relied on.

25 Q. If another council member -- at the same time

1 that Mr. Maniscalco requested what he requested, if  
2 another council member at the same time said, I don't  
3 think we should go that far, can you prepare a staff  
4 report regarding a ban only on aversive methods of  
5 conversion therapy, would there have been any reason why  
6 the legal department couldn't have prepared that staff  
7 report as requested?

8 MR. WILLIAMS: Object to that question as an  
9 improper hypothetical because it assumes something that  
10 didn't happen in terms of the process. I'll be happy to  
11 elaborate, if you want, to help you, Roger. But I --

12 MR. GANNAM: I think that's what makes it a  
13 hypothetical.

14 MR. WILLIAMS: No, no, because -- let me  
15 just help you. The legal department does what the  
16 council. You're saying an individual councilman.

17 MR. GANNAM: Fair enough.

18 BY MR. GANNAM:

19 Q. So Mr. Maniscalco motions for the council to ask  
20 for a staff report on a conversion therapy ban and  
21 another council member, through the -- through the  
22 appropriate rules of order and parliamentary procedure,  
23 adds an amendment to say we'd like you to prepare an  
24 order banning it all and -- or prepare a staff report on  
25 an ordinance banning it all and a staff report on an

1 ordinance banning only aversive methods and present them  
2 both to us. And that motion carries by a majority of  
3 the council. Is there any reason why the legal  
4 department would not have been able to comply with that  
5 request from the council?

6 A. Well, so I haven't -- the City relied on this  
7 literature to produce this ordinance. And this  
8 literature, to my understanding, doesn't really  
9 distinguish when it defines conversion therapy --

10 Q. Well --

11 A. -- so I -- just -- I'm sorry to interrupt. But  
12 -- and we weren't asked to identify specific literature  
13 on -- based on the hypothetical that you present. And  
14 the models that we followed identified this literature.  
15 And it was our position that we didn't have to try to  
16 one-up the American Psychological Association and the  
17 finding of their task force. The City could rely on  
18 those findings and cite to them, and we did. So that  
19 was -- I mean, I guess that's how I would answer your  
20 question.

21 Q. So there would have been nothing preventing the  
22 legal department from reviewing this literature that it  
23 was asked to review and in a staff report saying, hey,  
24 we think you can rely on this literature to support an  
25 entire ban, we don't think you can rely on this

1 literature to support only a partial ban because that's  
2 just not supported by the literature? Would there have  
3 been anything preventing you from providing that in a  
4 staff report if you were asked to do so?

5 A. I'll try to answer the question, and I'm not sure  
6 if I totally understand it. But, if a council member  
7 made a motion and the motion passed to direct the legal  
8 department to parse out the literature and to present  
9 the literature in a more detailed format, we could have  
10 done that. We could have come to council and presented  
11 a more thorough presentation on the -- on the American  
12 Psychological Association's Task Force, for example. We  
13 weren't asked to do that. But we -- but we provided  
14 that report, and we cite to it in our whereas clauses.  
15 And we weren't asked to specifically explain all the  
16 nuances of the report in a public hearing.

17 Q. If directed by the council as a whole to prepare  
18 a staff report, you know, comparing the possibility of a  
19 total ban compared to a ban of only aversive therapies,  
20 for example, the legal department could have prepared  
21 the report it was asked to prepare, correct, and then  
22 let the council decide whether to move forward or not?

23 A. The legal department can prepare all kinds of  
24 reports based on direction of the council.

25 Q. So is the answer to my question yes?

1           A. I'm not sure I completely understand. But, if  
2 the question is -- well, I'll just ask you for  
3 clarification. Are you asking could the -- could the  
4 legal department have prepared a report on whether or  
5 not the literature addresses aversive versus non and  
6 then report to council on that issue? Is that the  
7 question?

8           Q. Yeah. That is -- you can answer that question.

9           A. Yes. The legal department could have -- with any  
10 one of the numerous pieces of literature that we cite  
11 to, the -- the City staff could have reported to council  
12 and discussed any one of those reports in greater  
13 detail?

14          Q. And did the City Council, in this case at any of  
15 the public meetings where the ordinance was discussed or  
16 debated, hold any kind of debate among the council  
17 members as to whether a -- a complete ban or a -- or a  
18 ban only of certain kinds of conversion therapy would be  
19 better for the City?

20          A. I don't recall the specifics of which council  
21 members said what, but I don't recall there being any  
22 specific -- any council member raising a specific issue  
23 with the nuances that you're pointing out.

24          Q. All right. I'm going to ask you to look at an  
25 exhibit marked yesterday as Plaintiffs' Exhibit 2. This

1 is a document that was produced yesterday in the course  
2 of the deposition of Sal Ruggiero. It was identified by  
3 Mr. Ruggiero as a PowerPoint presentation. And, on the  
4 cover, it reads, Code Enforcement Update, Jerrod  
5 Simpson, Assistant City Attorney. Have you ever seen  
6 this document before?

7 A. Yes.

8 Q. What is this document?

9 A. It is a PowerPoint presentation that I had  
10 prepared for the Code Enforcement department.

11 Q. And did you make a presentation to the Code  
12 Enforcement department using this PowerPoint?

13 A. Yes.

14 Q. Do you remember when that happened?

15 A. I don't recall the specific date. I would say,  
16 roughly, it was -- it was a few months after the  
17 enactment or -- I'm not sure exactly when it would be.

18 Q. There are -- this presentation includes several  
19 slides regarding the conversion therapy ordinance,  
20 correct?

21 A. Yes.

22 Q. And, unfortunately, these pages are not numbered;  
23 so I'm going to try to direct you to a -- to a  
24 particular page. It reads at the top Conversion Therapy  
25 and it asks the question, how is it enforced?

1 A. Okay.

2 Q. It's about maybe two-thirds of the way into the  
3 presentation. But if you could try to find that.

4 A. Okay. I'm there.

5 Q. Now, the first bullet under the question reads,  
6 enforce through the special magistrate process. What is  
7 the special magistrate process?

8 A. It is a quasi-judicial enforcement process that  
9 is statutorily prescribed. The City has adopted State  
10 Statute Chapter 162 under the Florida Statutes where  
11 that chapter lays out a set of procedures that the City  
12 can follow. And the mayor appoints a special  
13 magistrate. And we have numerous special magistrates  
14 that are appointed by the mayor and confirmed by City  
15 Council. And it's a quasi-judicial enforcement process.

16 Q. So can you walk me through an example of how a  
17 complaint under the conversion therapy ordinance would  
18 be prosecuted or enforced through the special magistrate  
19 process. I assume it would be initiated by some kind of  
20 complaint under the ordinance?

21 A. The statute contemplates a document that I think  
22 you could consider to be the charging document for this  
23 process. It's labeled as a notice of violation.

24 Q. Okay.

25 A. So the first step in the process, once the City

1 has determined, the officials, Code Enforcement  
2 department in consultation with legal for -- for more  
3 complicated questions, the -- it's determined that -- in  
4 fact, the statute uses the word reasonable suspicion,  
5 reasonable belief. So, if the City determines that  
6 there's a reasonable belief that a violation has  
7 occurred and the City chooses to take action, exercising  
8 its prosecutorial discretion, the City would issue a  
9 notice of violation. And that would put the alleged  
10 violator on notice of what exactly the violation is that  
11 the City's alleging, what the nature of it is and what  
12 they can do to correct the violation.

13 Here, in this context, the City has legally  
14 determined it to be irreparable, irreversible, which,  
15 operatively under the statute, the City is normally  
16 required to give the alleged violator a cure period. If  
17 the City determines that it's irreparable or incurable,  
18 essentially, then we're not obligated to give that cure  
19 period. We can immediately resort to taking legal  
20 action beyond the notice of violation, which, in the  
21 context of the special magistrate process, means we  
22 can -- in addition to notifying them of the violation,  
23 we notify them of the hearing date. We can schedule a  
24 hearing, give them a reasonable time to prepare for that  
25 hearing; and then they would appear in front of the

1 hearing -- the hearing master.

2 Q. As an irreparable or irreversible violation, if  
3 the City determines that a violation has occurred, does  
4 it have any discretion in the matter of whether to go  
5 ahead and notice it for the hearing? Or is there some  
6 alternative that the City could elect in connection with  
7 that notice of violation?

8 A. I'm not sure I completely understand the  
9 question. But I'll try to answer anyway and just say  
10 that, once the notice of violation has been issued, the  
11 City I think at all times retains prosecutorial  
12 discretion whether or not to pursue a violation based on  
13 the circumstances of the situation.

14 Q. But, if the notice of violation is issued  
15 indicating that the City has determined that a --  
16 there's a reasonable belief that a violation has  
17 occurred, what is the next step after issuing that  
18 notice of violation?

19 A. The next step is that there has to be a hearing  
20 by the special magistrate who is to be the independent  
21 fact finder. And the City cannot impose a fine  
22 without -- without the special magistrate making a  
23 finding of fact that there has indeed been a violation.  
24 And then, of course, the special magistrate is then the  
25 authority that would determine the fine amount.

Page 100

1 Q. So, prior to going through the special magistrate  
2 process, is there ever a circumstance where -- where a  
3 Code Enforcement official could simply levy a fine  
4 against someone based on the initial determination that  
5 a violation has occurred?

6 A. Not that I'm aware of. There's fundamental due  
7 process that everyone's entitled to. So there -- if  
8 a -- we have a separate process for enforcement with  
9 civil citation where, if it's a repeat violation, that  
10 the City can immediately write a citation; and that  
11 citation would have a fine amount and the person can pay  
12 that. But, if the person doesn't think that the -- that  
13 it's proper or they want to contest it, they're entitled  
14 to due process. So it has to go in front of a judge or,  
15 in this case, a magistrate to determine whether or  
16 not -- in this particular set of circumstances, the City  
17 could not send a notice of violation to an alleged  
18 violator and also say pay us a thousand dollars. They  
19 have to go to the magistrate in order to determine that  
20 a violation did, in fact, occur; and then the magistrate  
21 would issue an order that would determine the fine  
22 amount.

23 Q. Does the case under the -- or would a case under  
24 the conversion therapy ordinance go to a particular  
25 special magistrate or a particular group of special

1 magistrates, or can it be heard by any special  
2 magistrate that Tampa employs?

3 A. There hasn't been any determination, under the  
4 conversion therapy ordinance, of which special  
5 magistrate would hear these cases. As a general matter,  
6 there are -- there are different topics that are  
7 assigned to different magistrates currently. And it  
8 hasn't been decided which magistrate would -- that  
9 these -- these types of violations would be assigned to.

10 Q. And what determines what kinds of subject matter  
11 or topics get assigned to a particular special  
12 magistrate?

13 A. There's no legal -- Chapter 162 does not  
14 articulate any specific requirements for how the City  
15 chooses which magistrate to hear which case. Generally  
16 speaking, it would be determined by the legal department  
17 based on the nature of the case, the experience of the  
18 magistrate and then in consultation with the alleged  
19 violator as to whether or not they had a particular  
20 issue or conflict of interest or something like that.

21 Q. So, in any case brought under this conversion  
22 therapy ordinance, the legal department would decide  
23 which special magistrate heard the case?

24 A. The ultimate -- the ultimate decision would be  
25 made in consultation with -- for example, if the alleged

Page 102

1 violator was represented by an attorney, or not, if they  
2 had a specific issue with a particular magistrate, we're  
3 obviously bound to the Constitutional due process. So,  
4 if there's a question of bias or appearance of bias or  
5 conflict of interest or those things, we would be  
6 subject to those sorts of things. If a doctor had a  
7 relationship with a special magistrate, for example,  
8 then that would guide the --

9 Q. Subject to, you know, rules of ethics that may --  
10 that may arise if there's conflicts, subject to  
11 considerations like that, it's the legal department that  
12 will chose the special magistrate to hear a particular  
13 case under the conversion therapy ordinance; is that  
14 generally correct?

15 A. Yeah. Generally speaking, the legal department  
16 would look to the roster, if you will, of special  
17 magistrates and determine who was best suited, most  
18 qualified to hear a case and be impartial and thorough  
19 and then in consultation with the alleged violator, if  
20 there's an issue. Now, there are -- like I said, there  
21 are specific subjects that are allotted to specific  
22 magistrates currently. And conversion therapy has not  
23 been given a -- a designation at this time.

24 Q. Are there any special magistrates currently  
25 employed by the City -- strike that.

1           Is my assumption correct that special magistrates  
2           are city employees?

3           A.   They're not.   They're unpaid volunteers.   I think  
4           that the only compensation that they are provided is  
5           parking validation.

6           Q.   Okay.   Thank you for that.

7           A.   There's some language in the statute that talks  
8           about that.   And I don't know if -- I can't give an  
9           opinion today whether or not we could pay them.

10          Q.   Okay.

11          A.   But we do not consider them employees.

12          Q.   So the special magistrates are unpaid volunteers  
13          who have -- who have requested I guess the -- the -- to  
14          serve in that capacity?

15          A.   They've been appointed by the mayor --

16          Q.   Okay.

17          A.   -- and there's a confirmation process.   And the  
18          subjects of their appointment are written out in the --  
19          in the resolution adopting the confirmation of the  
20          magistrate.

21          Q.   Are there any -- is there any set of mandatory  
22          qualifications for someone to serve as a special master?  
23          For example, do they have to be a licensed attorney or  
24          something like that?

25          A.   They are not required to be an attorney.   There

1 is some language in the -- in the state statute that --  
2 that lists some preferential occupations. I'll put it  
3 that way I think is a good way to put it. And I'm not  
4 specifically aware of whether or not -- if there's a --  
5 if the City posts, like, a job description and then  
6 there's -- you know, these are the requirements. I'm  
7 not aware of that, if there is -- I'm not sure if  
8 there's one or not.

9 Q. Are any of the special masters currently on the  
10 City's roster roll for special masters licensed mental  
11 health providers?

12 A. I don't know.

13 Q. Is there any plan in connection with the  
14 conversion therapy ordinance to recruit or appoint a  
15 special master who is a licensed mental health provider?

16 A. There's no -- not that I'm aware of.

17 Q. In the special master proceeding, are the rules  
18 of evidence more lenient than in a regular civil  
19 proceeding in county court or circuit court?

20 A. Yes.

21 Q. In what ways are the rules of evidence more  
22 lenient?

23 A. Well, the statute and the City ordinance adopting  
24 the statute explicitly states that the formal rules of  
25 evidence do not apply.

1 Q. That's provided by statute?

2 A. Correct.

3 Q. The evidentiary standards are specified by the  
4 statute?

5 A. In Chapter 162, it specifically states that the  
6 formal rules of evidence do not apply to these types of  
7 hearings.

8 Q. Was the decision -- or who made the decision  
9 initially to run enforcement of the conversion therapy  
10 ordinance through the special magistrate process as  
11 opposed to some other enforcement process that may have  
12 been available to the City?

13 A. Ultimately, council makes the decision through  
14 the ordinance. But I know what you're saying --

15 Q. By passing the ordinance --

16 A. -- so I'll elaborate further. And the answer is  
17 that Ernest Mueller, in making his initial draft to  
18 present for their consideration, made the determination  
19 to apply it through the Chapter 9 special magistrate.

20 Q. Was there any discussion at the council meeting  
21 as which that was presented or questions directed to  
22 Mr. Mueller about why that process versus another  
23 process?

24 A. I can say that, generally -- and I think that  
25 you'll see this when you look at the hearings, that

Page 106

1 enforcement was -- was a discussion that we were having.  
2 Ernest Mueller, his background is in enforcement. I'm  
3 in the enforcement. So we're both enforcement-minded  
4 attorneys. And we were trying to consider all the  
5 possibility of what sets of facts would be prosecutable,  
6 what -- how would we be able to obtain evidence, how  
7 would we present that and what -- what processes that we  
8 had available for enforcement that would be appropriate.  
9 So I would say that we thoroughly considered all aspects  
10 of enforcement and all of the methods that are available  
11 to the City.

12 Q. When you say, "we," you're talking about the  
13 legal department?

14 A. Correct.

15 Q. As far as what the City Council considered, it  
16 considered what Mr. Mueller presented to them?

17 A. Well, there was some discussion, I recall, at one  
18 of the hearings or maybe even both of the hearings about  
19 some of this enforcement language with the -- with the  
20 fine amounts and then also with the irreparable  
21 language.

22 Q. Okay.

23 A. So it was discussed at council. I would just --  
24 I don't recall specifically, so I would refer you to  
25 that hearing.

1 Q. Whatever's in the record?

2 A. Yeah, right.

3 Q. Can you flip the page onto the next slide. Still  
4 says Conversion Therapy at the top. And the slide reads  
5 all, in all caps, possible conversion therapy cases must  
6 be referred to legal for review prior, again in all  
7 caps, to the issuance of a notice of violation. Tell me  
8 what is the -- what does this indicate as far as a  
9 policy for -- for enforcement?

10 A. Well, this was -- this was my suggestion and  
11 advice to my client that -- the Code Enforcement  
12 department that -- that it's safe to assume that all of  
13 these cases are going to be complicated to the extent  
14 that they should consult with us on their actions --

15 Q. And so --

16 A. -- prior to taking the first legal --  
17 legally-operative action in enforcement, which is the  
18 notice of violation.

19 Q. So, when you made this presentation that's  
20 reflected in this PowerPoint to all of the -- or to the  
21 Code Enforcement department and it includes this  
22 statement that all possible conversion therapy cases  
23 must be referred to legal for review prior to the  
24 issuance of a notice of a violation, does that reflect a  
25 policy decision made by the head of Code Enforcement; or

1 does that reflect a policy decision made by the legal  
2 department?

3 A. I don't know that I would characterize it as a  
4 policy position. Ultimately, the code enforcement  
5 official would -- has the discretion to consult with  
6 legal or not to consult with legal. And I don't know --  
7 don't believe that there was ever any standard operating  
8 procedures developed for conversion therapy. What this  
9 is -- what this was me trying to convey is that it would  
10 be helpful for the -- the department, if a complaint  
11 came in, conversion therapy related complaint, to  
12 consult with legal so that we could help guide them in  
13 both determining whether or not the complaint and the  
14 evidence that they had met the threshold of being a  
15 violation and, if it didn't, what information they would  
16 need to gather in order to obtain the determination --  
17 make the determination of a violation and then also what  
18 sort of constraints that they would have in gathering  
19 evidence.

20 Q. So I understand you just answered that -- and you  
21 determined it would be helpful for legal to be consulted  
22 prior to the issuance of a violation. But this slide  
23 says quite clearly that all possible conversion therapy  
24 cases must be referred to legal for review. That's a  
25 little stronger, isn't it, than just that it would be

1 helpful?

2 A. Sure.

3 Q. So under whose authority was the directive given  
4 to the entire Code Enforcement department that all cases  
5 must be referred to legal for review prior to the  
6 issuance of a notice of violation?

7 A. Under my authority as the -- as one of the  
8 prosecuting attorneys for the City, I was trying to  
9 emphasize the importance of consulting with legal in the  
10 investigation of these cases. That's why I chose that  
11 language.

12 Q. Did Mr. Ruggiero or anyone acting on his behalf  
13 ever tell you, no, we'll decide when to consult legal  
14 before we issue a notice of violation because that's our  
15 jurisdiction?

16 A. No.

17 Q. And, to date, it's my understanding there have  
18 been no cases either referred to legal or in which a  
19 notice of violation was issued under this ordinance; is  
20 that correct?

21 A. That's my understanding, as well.

22 Q. Are you aware of any other city ordinance where  
23 there is a -- a directive in place such as this one  
24 where the Code Enforcement department has been told that  
25 all cases must be referred to legal for review prior to

1 the issuance of a notice of violation?

2 A. I just want to look at this here because -- is  
3 this the entire presentation that was given that day?

4 Q. Couldn't tell you.

5 A. Here you go. This is it. I just didn't know --  
6 you printed it out. I didn't know if you printed out  
7 the whole thing.

8 Q. This was actually printed out for us by your  
9 lawyer.

10 A. Yeah, it looks like it is. I just couldn't find  
11 what was there.

12 I'll just refer you to another slide in this  
13 presentation. And it's under the mobile home park's  
14 slide. And, at the top, it says, Florida Statute  
15 723.083.

16 Q. Let me catch up. Okay.

17 A. At the bottom there, you can see, it says, all  
18 orders to vacate or demolish on a mobile home must be  
19 referred to legal for review prior to taking any action.

20 Q. So is that -- is that similar to an initial  
21 notice of violation, or is that something -- or would an  
22 order to vacate or demolish be something that happens  
23 further down in the line in the mobile home process?

24 A. It would be subject to the facts of the  
25 situation. An order to vacate could be the first legal

Page 111

1 action that a city takes on a particular property,  
2 dependent on the circumstances.

3 Q. Okay. So that's an example. Are there any other  
4 examples you can think of where a -- there's a directive  
5 in place to consult legal before -- before action can be  
6 taken under any circumstances?

7 A. I can't recall specifically one. I only recalled  
8 this one because it's in this presentation that you have  
9 here. I'll just say, as a general matter, we advise the  
10 department, for any issue that gets complicated or  
11 unusual, that they -- that they consult with us from the  
12 very beginning of the situation.

13 Q. Would you consider a complaint of a violation of  
14 the conversion therapy ban to be a complicated or  
15 unusual case?

16 A. Yes.

17 Q. And why?

18 A. Well, it's unusual because it's the only thing in  
19 the code that deals with this -- things of this nature  
20 for the department.

21 Q. When you say, "things of this nature," do you  
22 mean mental health issues or counseling issues?

23 A. Right, with mental health and with LGBT issues.  
24 Those are not -- those are obviously not day-to-day,  
25 everyday issues for the Code Enforcement department.

Page 112

1 Q. Any other reason you consider a potential  
2 violation of the conversion therapy ban to be a  
3 complicated or unusual case?

4 A. Well, because you're dealing with minors and  
5 you're dealing with patient/provider privilege. You're  
6 dealing with -- so complicated evidentiary issues that  
7 every case is going to have.

8 Q. Does the City consider its Code Enforcement  
9 department competent to deal with conversion therapy  
10 cases without consulting legal beforehand?

11 A. Yes. I would just add to that that -- that, you  
12 know, again, consulting with legal is a very strong  
13 suggestion. And I don't -- I don't believe that  
14 they would undertake any action. And it's my  
15 understanding that -- in conversations with the  
16 department that their plan is not to. But that policy  
17 has never been formalized in any written standard  
18 operating procedure, as far as I'm aware.

19 Q. Does the directive reflected in your slide here  
20 about referring all cases to legal for review prior to  
21 the issuance of a notice of violation, does this also  
22 require Code Enforcement to refer a possible conversion  
23 therapy case to legal if the Code Enforcement official's  
24 initial determination is that this is not a meritorious  
25 complaint and we should take no further action? Does

1 that also need to come to legal for review?

2 A. I would not include that in my consider --  
3 because, ultimately, if the department -- if they're  
4 determination is that the City's not going to -- to do  
5 anything, then there's nothing to consult legal about if  
6 they're not going to do anything.

7 Q. So the City is entrusting the Code Enforcement  
8 officials to make an initial determination as to whether  
9 a violation has occurred, a violation based on this  
10 ordinance where the City has determined that significant  
11 harm could result as a result of conversion therapy; and  
12 the City would allow the Code Enforcement Board -- or  
13 Code Enforcement officials to determine there is no  
14 violation and take no action without consulting the  
15 legal department first?

16 A. Yes. If a random anonymous call came in and  
17 provided zero information, I would not expect the Code  
18 Enforcement department to call me and give me all the  
19 details of a -- of an anonymous meritless complaint. I  
20 would expect that they would decide not to pursue that  
21 and decide not to take my time up with that -- with  
22 telling me about it.

23 Q. Show you another document. This was previously  
24 marked as Plaintiffs' Exhibit 3. This was also produced  
25 yesterday by your attorney in the course of

1 Mr. Ruggiero's deposition. This appears to be some  
2 subset of the slides in the presentation we were just  
3 looking at as Plaintiffs' Exhibit 2. But, on the cover,  
4 it reads Code Enforcement Conversion Therapy instead of  
5 Code Enforcement Update. Did you prepare this -- this  
6 second document marked as Exhibit 3?

7 A. This appears to be a -- maybe an earlier draft  
8 version of what ultimately became the -- the  
9 presentation that I gave.

10 Q. So did you ever give a presentation based on this  
11 Exhibit 3 document?

12 A. I only gave one presentation. And the Exhibit --  
13 Plaintiffs' Exhibit 2 I think you've marked it as, I  
14 think that this is fairly and accurately depicting the  
15 presentation that I -- the one presentation that I gave.

16 Q. Exhibit 2 is?

17 A. Right. The one that you've just handed me that  
18 has Conversion Therapy on the title appears to be an  
19 earlier draft of what ultimately became the presentation  
20 that was given.

21 Q. Okay. Apart from the training that you gave --  
22 or the presentation that you gave to Code Enforcement  
23 based on the PowerPoint of Exhibit 2, apart from that  
24 training, have you had any other -- have you held any  
25 other training sessions with Code Enforcement personnel

1 regarding the conversion therapy ban?

2 A. No.

3 Q. Are there any plans to hold any additional  
4 training?

5 A. Not that I'm aware of.

6 Q. Why were you selected for the training?

7 A. Because I'm one of the municipal prosecutors.

8 Q. If a Code Enforcement official has a potential  
9 conversion therapy case and follows the directive from  
10 your presentation to call legal first, are you the  
11 person that that complaint would come to?

12 A. It could -- it could come to either myself, or it  
13 could come to an attorney by the name of Colin Rice.

14 Q. Colin, R-i-c-e?

15 A. Yes, Patrick Colin Rice.

16 Q. And what is Mr. Rice's position or title?

17 A. He's a municipal prosecutor, as well. We're in  
18 the same division under Rebecca Kert.

19 Q. Okay. Anyone else that that complaint could come  
20 to?

21 A. Well, I mean, I -- theoretically, they could call  
22 anyone at the City Attorney's Office. But, ultimately,  
23 Colin and I are the legal advisors who are assigned to  
24 the Code Enforcement department as legal advisors. And  
25 Colin and I are the attorneys that would prosecute a

1 case once legal action was taken. And, once the case  
2 was brought into the legal forum, then we would have the  
3 prosecutorial discretion to decide what was appropriate.

4 Q. Is there any formal or informal policy at the  
5 City Attorney's Office to send all conversion therapy  
6 ban cases to you or to you or Colin or something along  
7 those lines?

8 A. There's no formal policy; but it's likely, being  
9 that I've been involved with this ordinance from the  
10 beginning, that I would be involved with -- with any  
11 case that came out of it.

12 Q. Earlier we talked about the -- is it k:drive at  
13 the City Attorney's Office as the computer drive that's  
14 accessible by all personnel in the City Attorney's  
15 Office; is that correct?

16 A. Yes. The k:drive is our shared -- our shared  
17 storage device that's cloud-based storage.

18 Q. And does Ernest Mueller have access to documents  
19 and files that are on the k:drive?

20 A. I believe so. It's my understanding that  
21 everyone in the legal department has access to what we  
22 call the k:drive. I believe other departments might  
23 have other shared drives that are not accessible by all  
24 departments, but I can't really speak to all the details  
25 of those files and folders.

1 Q. As far as the legal department's k:drive, it's  
2 your understanding that Ernest Mueller has access to  
3 files on that drive?

4 A. Yes.

5 Q. And is it also your understanding that  
6 Salvatore Territo would have access to files on that  
7 drive?

8 A. Yes.

9 Q. I mentioned -- the PowerPoint presentation that  
10 we identified as Exhibit 2, the one that you believe  
11 represents the presentation you gave to the Code  
12 Enforcement department, is that on the k:drive?

13 A. I believe so.

14 Q. You had an opportunity to review your -- your  
15 file, what you call your file, regarding the conversion  
16 therapy ordinance before you testified today; is that  
17 correct?

18 A. Yes.

19 Q. And you also responded to Plaintiffs' written  
20 discovery requests -- at least you verified the factual  
21 answers that were contained in the City's response to  
22 Plaintiffs' discovery requests; is that correct?

23 A. I signed the interrogatories, yes.

24 Q. Okay. Did you review -- had an opportunity to  
25 review the document requests that are in the written

Page 118

1 discovery requests from Plaintiffs to the City of Tampa?

2 A. I've reviewed the order that limited the scope of  
3 discovery to the twenty custodians and the thirty search  
4 terms and then the dates. I've also reviewed the memos  
5 that were sent out by our outside counsel's assistant  
6 requesting the production of documents. And I've  
7 been -- had discussions with -- with outside counsel  
8 about our process for producing discovery.

9 Q. In the course of reviewing your file and  
10 reviewing the Court's order that specified the  
11 custodians and search terms and date ranges, do you know  
12 whether there are documents in your conversion therapy  
13 ban file that would be responsive to the various search  
14 terms but were not produced because they were not deemed  
15 to be in the custody of one of the twenty identified  
16 custodians?

17 A. It's my understanding that everything that was  
18 responsive to the order has been provided.

19 Q. That's not quite my question.

20 My question is: Are you aware of any documents  
21 in your file, what you call your file, that would  
22 contain any of the search terms that are in the order  
23 but were nonetheless not produced because they were not  
24 deemed by the City to be held by one of the twenty  
25 custodians?

Page 119

1           A. I believe you asked me something like this  
2 earlier. I haven't compared my file to what's been  
3 produced. It's my understanding that there was  
4 something like nine to ten thousand pages of documents  
5 that were produced, many of which were not really  
6 relevant to the case. But they were produced  
7 nonetheless because the search terms that you selected  
8 and that the Court put into the order. And so --  
9 because I haven't compared nor was I of the  
10 understanding that I was supposed to compare what was in  
11 my file with what was produced. So I don't know -- as I  
12 stated earlier, I don't know if there's a document in my  
13 file that was not produced to you. But I do -- I am of  
14 the understanding that everything that was relevant to  
15 the order was produced.

16           Q. And I think there's two different questions here.  
17 One is -- that you answered earlier and I think that's  
18 answered again, which is you don't know whether any  
19 documents in your file were produced because you haven't  
20 reviewed the whole production to reach a conclusion one  
21 way or the other. Is that a fair statement?

22           A. Right. I haven't reviewed the -- everything that  
23 was produced to you.

24           Q. My question -- my second question is: Do you  
25 know whether there are documents in your file that were

Page 120

1 withheld from production even though they contain one of  
2 the thirty search terms because the City determined that  
3 they were not in the custody of one of the twenty  
4 identified custodians?

5 A. No. My -- my understanding is that everything  
6 that was -- everything that was subject to the order  
7 that limited the scope of discovery was provided. And I  
8 haven't compared what's in my file with what was  
9 produced or with what the limited scope of the order  
10 was.

11 Q. Was the document produced yesterday that was  
12 marked as Plaintiffs' Exhibit 2, the PowerPoint  
13 presentation, in the -- the set of documents that you  
14 referred to as your file?

15 A. Yes. It's in my file because I saved e-mails in  
16 my file that were related to conversion therapy and  
17 because I e-mailed this presentation both to myself so  
18 that I could pull it up at the City building where we  
19 were, so I could access it through the internet because  
20 not all computers have access to the k:drive, like I  
21 said earlier.

22 In order to access it, I e-mailed it to myself,  
23 opened up my e-mail, pulled it up that way so that I  
24 could present it. And then, following the presentation,  
25 one of the supervisors -- her name's Susan Wenrick --

Page 121

1 asked me if a code enforcement officer wants to see the  
2 presentation, how can they get it? And I told her that  
3 I would e-mail it to her, and then she could be the  
4 point of contact for distributing it to anyone that  
5 would be interested or had any questions and wanted to  
6 refer to it. So I e-mailed it to her, and that was the  
7 only person that I ever sent it to apart from myself.

8 Q. So the set of documents that you referred to --  
9 that we referred to several times today as your file --

10 A. Right.

11 Q. -- would include that PowerPoint presentation we  
12 marked as Exhibit 2?

13 A. I believe, in my file, it's included as an  
14 attachment to an e-mail that was saved into my file  
15 along with all the other e-mails that I saved in there.

16 Q. Does it exist in your file simply as a PowerPoint  
17 presentation that's sitting there in what you determine  
18 to be your file? Not as an e-mail attachment but just  
19 standing alone?

20 A. I don't believe so, but I'm not sure about that.

21 Q. But does the -- regardless of whether it's in the  
22 set of documents you're calling your file, does this  
23 PowerPoint presentation exist as a -- simply as a  
24 PowerPoint document on the k:drive and in some folder on  
25 the k:drive?

Page 122

1 A. I don't know. I mean, it exists. It's there as  
2 an attachment. So I'm not sure -- I'm not --

3 Q. You initially created it in PowerPoint, though,  
4 correct?

5 A. Yes.

6 Q. And saved what you created somewhere, I presume?

7 A. Right. It would have been saved on my computer  
8 and then moved into the k:drive or maybe saved into the  
9 k:drive.

10 Q. Is your normal practice to save documents you  
11 create for work on the k:drive, or do you usually save  
12 them to a local drive that's only on your PC or the  
13 computer that you use?

14 A. I don't know that I have a normal practice for --  
15 when it comes to that, that type of thing. I mean, for  
16 this, the only goal that I had was -- I mean, obviously,  
17 I was going to make a presentation; so I just needed to  
18 have that file. So, obviously, it had to have been  
19 saved at some point or else I could not have e-mailed  
20 it. But I don't know to what extent I saved it on the  
21 desktop or I saved it in the k:drive. I don't know.

22 Q. I'm going to show you a document now I'm going to  
23 mark as Exhibit 24.

24 (Plaintiffs' Exhibit No. 24 marked for identification)

25 BY MR. GANNAM:

1 Q. This is an e-mail produced at COT PRODUCTION  
2 004938 from Helene Hvizd to Ernest Mueller with a copy  
3 to Jerrod Simpson. That's the latest message in the  
4 string. The earlier message appears about halfway down  
5 the page, says, from Ernest Mueller to Helene Hvizd,  
6 copy it Jerrod Simpson.

7 And that earlier e-mail, says, Ms. Hvizd, at long  
8 last, I'm sending you a copy of our proposed conversion  
9 therapy ordinance. It passed first reading today and is  
10 scheduled for second reading on April 6, 2017.

11 Did I read that correctly?

12 A. Yes.

13 Q. And then the later message at the top, says,  
14 thank you so much, Ernie. I look forward to reading  
15 your ordinance and examining your unique take on the  
16 enforcement concerns.

17 Now, it showed that you're copied on this e-mail  
18 conversation. Do you recall receiving this e-mail?

19 A. Yes.

20 Q. Do you know what Ms. Hvizd is referring to when  
21 she says, your unique take on the enforcement concerns?

22 A. I wasn't -- I wasn't in the conversations between  
23 Ernie and Ms. Hvizd. But it's my understanding that  
24 they discussed both the City's language -- and you can  
25 see for yourself in the enforcement provisions that the

1 City's language is slightly different than the other  
2 ordinances in that the City declares a violation of this  
3 nature to be irreparable or irreversible. And so --  
4 and, in speaking with Ernie to prepare for this  
5 deposition as a representative of the City, it's my  
6 understanding that they did have a conversation about  
7 process -- enforcement process from the standpoint of  
8 the -- of 162 -- Chapter 162 of the Florida Statutes.

9 Q. Do you know what the enforcement concerns were  
10 that Ms. Hvizd is referring to in her e-mail to  
11 Mr. Mueller?

12 A. Again, I believe it's related to the irreparable,  
13 irreversible language. When I was explaining the  
14 Chapter 162 earlier, the City is normally -- if a  
15 violation is curable, then the City is obligated under  
16 the code enforcement statutes to give the alleged  
17 violator time to cure prior to taking action. And so,  
18 by declaring a violation of this nature to be  
19 irreparable, the City has determined that these  
20 violations will not be subject to cure periods, that,  
21 once a notice of violence is issued, the City can  
22 immediately bring an alleged violator in front of a  
23 magistrate to prosecute the violation. There would be  
24 no obligatory cure period.

25 Q. In your conversation with Mr. Mueller, did you

1 ask him specifically about this e-mail?

2 A. Yes.

3 Q. And did you ask him if he knew what Ms. Hvizd  
4 meant by enforcement concerns?

5 A. I did not ask that specific question about her  
6 specific words.

7 (Plaintiffs' Exhibit No. 25 marked for identification)

8 BY MR. GANNAM:

9 Q. I'm going to hand you Exhibit 25. This is  
10 produced as COT PRODUCTION 001706. And it is an e-mail  
11 string, the earlier message of which is from  
12 Erin Bradley to Jerrod Simpson -- I'm sorry. The  
13 earliest message is from Jerrod Simpson to  
14 Ernest Mueller dated March 9, 2017, at eleven-seventeen  
15 a.m. Do you see that?

16 A. Yes.

17 Q. And the question you pose is: Do you have the  
18 draft done yet? I spoke with Carrie, and some of the  
19 advocates are asking for a draft prior to the council  
20 hearing. Do you remember sending this e-mail?

21 A. I don't remember seeing this e-mail. But I --  
22 sending the e-mail. But I am familiar with its content.

23 Q. Okay. Who is Carrie?

24 A. Carrie is Carrie Henriquez.

25 Q. When you say the draft, are you referring to a

1 draft of the conversion therapy ordinance?

2 A. Yes. I'm referring to the draft ordinance that  
3 is going -- is going to be presented to the City  
4 Council. And it looks like, according to the date here,  
5 I'm most likely referring to the -- what is going to be  
6 presented for first reading.

7 Q. And the portion that says, some of the advocates  
8 are asking for a draft prior to the council hearing, who  
9 are the advocates?

10 A. I don't recall specifically who the advocates  
11 were. All I -- and I don't know how I spoke with  
12 Carrie. If I bumped into her in the hallway or if we  
13 spoke over the phone, I don't recall. But some of the  
14 people that were contacting her were asking for a draft,  
15 and so she was asking me if I could get her the draft.  
16 And I don't know who the advocates were, whether -- or  
17 what side of the issue they were on.

18 Q. Is this a common request to provide a sort of a  
19 preview of draft legislation before it's presented to  
20 the council?

21 A. Yes.

22 Q. And did you, in fact, provide Carrie with a  
23 draft?

24 A. I believe so. As soon as we had a draft that was  
25 essentially what was going to be presented to the

1 public, I believe -- I'm not -- I'm not sure exactly how  
2 it was provided or what it exactly was that was  
3 provided. It could have been as simple as in an e-mail  
4 or as a paper copy in passing in the hallway. I don't  
5 recall.

6 Q. As you sit here today, you don't know what  
7 advocates Carrie was referring to when she said they  
8 wanted copies?

9 A. I don't -- no, I don't. In relation to this  
10 e-mail and this conversation, I don't -- I don't know  
11 what advocates I was referring to.

12 Q. Apart from the e-mail, are you aware, as you sit  
13 here, of any particular advocates who were looking for  
14 drafts of the ordinance before it was voted on by the  
15 City Council?

16 MR. WILLIAMS: Does he remember that? Is  
17 that what your question is?

18 MR. GANNAM: Right.

19 BY MR. GANNAM:

20 Q. Do you know? Can you remember any?

21 A. Can you repeat the question? I'm sorry.

22 MR. GANNAM: Can you just read that back.

23 (Requested portion read back by the court reporter)

24 THE WITNESS: I'm only aware that Carrie had  
25 requested a draft for me to -- to give to her so that

1 she could distribute it. That's the only thing I'm  
2 aware of.

3 BY MR. GANNAM:

4 Q. Okay. I'm handing you Exhibit 26.

5 (Plaintiffs' Exhibit No. 26 marked for identification)

6 BY MR. GANNAM:

7 Q. This is a document produced in this case at COT  
8 PRODUCTION 005651. At the top, it reads, Considerations  
9 for Conversion Therapy Ordinance. Do you recognize this  
10 document?

11 A. No.

12 Q. Does the format or the way it's written indicate  
13 to you who the author is?

14 A. No.

15 MR. GANNAM: All right. I'm going to hand  
16 you Exhibit 27 then.

17 (Plaintiffs' Exhibit No. 27 marked for identification)

18 BY MR. GANNAM:

19 Q. Before I leave Exhibit 26, if you needed to  
20 determine who wrote that document, who would you ask?

21 A. I would go to Ernest Mueller.

22 Q. Do you think it's something he wrote or authored?

23 A. I do, based on the lists of things that are being  
24 considered. It sounds like, if this was something that  
25 was drafted by the City, then it would -- it could very

1 well be Ernest Mueller.

2 Q. Okay. I'm going to show you Exhibit 27 now.

3 This is a document produced in discovery as COT  
4 PRODUCTION 004427. At the top, it says, good morning  
5 council. The next line says, Ernest Mueller with the  
6 legal department. Do you know what this document is?

7 A. No.

8 Q. The third paragraph says, I am here with  
9 Jerrod Simpson on Item 80 where the council asked the  
10 legal department to appear and present a draft ordinance  
11 regarding conversion therapy to minors. Then it reads,  
12 the draft ordinance is being passed out to you.

13 Does that content help you to determine what this  
14 document is?

15 A. Yes.

16 Q. What do you think it is?

17 A. Well, I think -- and without knowing anything  
18 about it really, it appears to be a guide for a  
19 presentation, maybe some bullet points that Ernie could  
20 have been referring to. But, again, I'm not familiar  
21 with it; so I can't really authenticate it in any way.

22 MR. GANNAM: All right. I'm going to take  
23 five minutes with my colleague and see if we have  
24 anything else.

25 MR. WILLIAMS: All right.

1 (Recess)

2 MR. GANNAM: Rob, I have a question for you  
3 before we go on.

4 MR. WILLIAMS: Sure.

5 MR. GANNAM: We've heard some testimony  
6 regarding the k:drive that is accessible to the legal  
7 department. My question for you, if you know, is:  
8 Were -- were the entire contents of the k:drive searched  
9 for the thirty search terms within the date parameters  
10 established by the Court?

11 MR. WILLIAMS: The thirty search terms were  
12 done by a gentleman by the name of Jim Crew. Jim Crew  
13 is the head of the IT Department or -- I'm not sure what  
14 his normal title is. But --

15 THE WITNESS: I can speak to that if you  
16 prefer to have it from a fact witness.

17 MR. GANNAM: Let Rob finish, and then I'll  
18 come back to you.

19 MR. WILLIAMS: So that's who got the thirty  
20 search terms. And that's what produced all those pieces  
21 of paper. Okay?

22 So I can't answer your question specifically  
23 without talking to my paralegal Coralane (phonetic), and  
24 I'll do that immediately. She was in charge of all of  
25 this and had multiple conversations with various people

1 to make sure that she -- and she's very good at this.  
2 And I'm sure she can provide the answer -- the answer to  
3 that question specifically.

4 MR. GANNAM: Okay.

5 MR. WILLIAMS: But I can't do it off the top  
6 of my head.

7 MR. GANNAM: Understood.

8 BY MR. GANNAM:

9 Q. I'm going to turn to you now, Mr. Simpson, as the  
10 City's designee on the issue of the production that  
11 occurred in this case. Were all documents on the  
12 k:drive responsive to the thirty search terms identified  
13 by the Court produced in the course of the document  
14 production in this case?

15 A. I would -- I can -- can I just confirm what he  
16 said is true. The only correction that I would make for  
17 the record is that Jim Crew is with the City Clerk's  
18 office.

19 Q. So, as you sit here, you don't know whether all  
20 documents on the k:drive, the legal department's  
21 k:drive, responsive to the thirty search terms were  
22 produced?

23 A. The City complied with the order that limited the  
24 scope of discovery. So, to the extent that there are --  
25 are items on the k:drive that aren't under the purview

1 of that, then I don't believe that those were produced.

2 Q. And I want to be clear. I know you haven't been  
3 party probably to the various, you know, disputes and  
4 discovery discussions that we've had. We might have a  
5 different interpretation of what that order requires as  
6 compared to the City's lawyers. And so, to cut through  
7 whose interpretation is right, I just want to establish  
8 as a factual matter whether all documents on the k:drive  
9 that are responsive to the thirty search terms were  
10 produced?

11 A. I don't know the answer to that.

12 MR. WILLIAMS: My paralegal would.

13 MR. MIHET: Is she still here?

14 MR. WILLIAMS: She's gone now.

15 MR. GANNAM: She just walked in the door.

16 MR. MIHET: Okay. Just, Mr. Williams, we  
17 would take the position that the documents on that  
18 k:drive that are responsive to the search terms should  
19 have been produced. If they were not, we would like  
20 them to be produced immediately so that we have a chance  
21 to review them well in advance of the hearing. So, if  
22 possible, by tomorrow we'd like to have an idea whether  
23 or not the documents were produced. If not, will you be  
24 willing to produce them immediately? And, if not, we'll  
25 try to get the issue before the court right away.

Page 133

1 MR. WILLIAMS: My answer is that, to the  
2 extent that the k:drive has documents that weren't  
3 produced as a result of what Mr. Crew did and are  
4 responsive under the order, I will request and direct my  
5 paralegal to figure that out immediately. And I will  
6 not be in the office tomorrow because I've got a court  
7 hearing out of the office.

8 MR. HARVEY: If I can speak to that too,  
9 Rob.

10 MR. WILLIAMS: Okay. Go head.

11 MR. HARVEY: Because, if I'm understanding  
12 your issue correctly, the k:drive, the twenty custodians  
13 on a list were provided with directions to search their  
14 personal -- not personal -- but their work, finding the  
15 documents; and so those documents were produced. And  
16 so, if you're taking the position that somebody should  
17 go through every k:drive, even for the attorneys in our  
18 office who were not among those twenty --

19 MR. MIHET: I think the testimony has been  
20 that at least two people from the twenty have access to  
21 the k:drive.

22 MR. HARVEY: Everybody -- my understanding  
23 is everybody in the legal department has access to  
24 everything on the k:drive, which would be all the city  
25 attorneys, every document under every file in the

1 k:drive, which would be God knows how many documents.

2 MR. MIHET: Sure. So, to that extent, the  
3 entire k:drive should have been searched.

4 MR. HARVEY: That's what I'm clear about.  
5 So you're taking the position that people beyond the  
6 twenty should be searched?

7 MR. MIHET: No. If Mr. Territo and  
8 Mr. Mueller have access to the k:drive, because they are  
9 part of the custodians, then the k:drive should have  
10 been searched because the documents on the k:drive are  
11 within their custody, possession or control.

12 MR. HARVEY: That's what I'm saying. So  
13 you're taking the position that everybody -- every  
14 document is in the custody and control of every attorney  
15 in our office because everybody has access to the  
16 k:drive?

17 MR. MIHET: On the k:drive, if they have  
18 access to it, that is our position. And I --

19 MR. HARVEY: Well, let's just clarify what  
20 happened is the twenty custodians were contacted to  
21 produce what documents they got.

22 MR. MIHET: So the question is: Was the  
23 k:drive searched?

24 MR. HARVEY: I don't know that there's a way  
25 to search the entire k:drive like you can search the

1 e-mail search. But the answer is, no. I mean, the  
2 people beyond the twenty were not.

3 MR. WILLIAMS: Well, let's refine it  
4 further. You know, not only were memos sent out to the  
5 individuals, okay, my paralegal made direct inquires,  
6 okay, to make sure that the responses were forthcoming.  
7 We're talking about a lot of people who have a lot of  
8 other things to do. So we did that. And she is the one  
9 who did it, not me. And that's why I'm referring to  
10 her, and I will direct her to do whatever she needs to  
11 do. And it may well be that those documents that you're  
12 generally alluding to may have been produced as a result  
13 of other stuff. You know?

14 MR. MIHET: Well, we know that at least one  
15 wasn't. And so, yesterday, the reason --

16 MR. WILLIAMS: Which one are you talking  
17 about?

18 MR. MIHET: The PowerPoint presentation.

19 MR. WILLIAMS: Actually, that wasn't -- that  
20 wasn't produced because it was determined that it wasn't  
21 within the ambit. And let me finish, if I may.  
22 Different people could disagree with that. But, when it  
23 came up yesterday, as I said, I recommended to the City  
24 and we immediately produced it. You have it. And you  
25 talked to Mr. Ruggiero, and you talked to Mr. Simpson.

Page 136

1 I don't know if you talked to Guido or not. So it's an  
2 imperfect process.

3 MR. MIHET: Sure.

4 MR. WILLIAMS: And I think we can all agree,  
5 right?

6 MR. MIHET: Yeah. All I'm saying is we know  
7 the PowerPoint is on the k:drive. We believe --

8 MR. WILLIAMS: He wasn't sure if it is. I  
9 think that's what he testified.

10 MR. MIHET: Well, okay, we can go back and  
11 parse his testimony --

12 MR. WILLIAMS: We'll find out. We'll find  
13 out.

14 MR. MIHET: -- but it's our position that,  
15 by virtue of it being on the k:drive coupled with the  
16 fact that at least two of the custodians have access to  
17 the k:drive, it was responsive and should have been  
18 produced.

19 What we want to know is, now that we know  
20 that, have all the other documents --

21 MR. WILLIAMS: Sure.

22 MR. MIHET: -- on the k:drive been produced?

23 And so, if the answer is yes, then the  
24 answer is yes. If the answer is no, then the question  
25 is: Would they be searched and produced without us

Page 137

1 going back to the court? And we'd like know that by  
2 tomorrow if possible because the time is very short.

3 MR. WILLIAMS: All right. The time is  
4 short. But I'm not going to be in the office tomorrow.  
5 I'll direct my paralegal to do it, and then she can deal  
6 with perhaps David or Friday when I get back to the  
7 office. She is very very competent. And I'm sure she  
8 can figure all of this out. And, to the extent that we  
9 agree that certain documents should have been produced  
10 and for whatever reason were not, probably an  
11 interpretation issue, we'll discuss the interpretation.  
12 But, if there's no interpretive issue and some were  
13 missed, then we will rectify that because, as I just  
14 said and you agree, this is an imperfect process. Is  
15 that fair enough?

16 MR. MIHET: We'll wait to hear hopefully  
17 from you tomorrow, but, at the latest, from you first  
18 thing on Friday morning?

19 MR. WILLIAMS: Yes.

20 MR. GANNAM: That's all we have. No further  
21 questions.

22 MR. WILLIAMS: Thank you. All witnesses  
23 will read.

24 (Proceedings concluded at 5:29 o'clock p.m.)

25

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

CERTIFICATE OF OATH

STATE OF FLORIDA)  
COUNTY OF PALM BEACH)

I, Rachele L. Cibula, the undersigned authority,  
certify that JERROD SIMPSON personally appeared before  
me and was duly sworn.

Witness my hand and official seal this 6th day of  
November, 2018.



*Rachele L. Cibula*

RACHELE L. CIBULA  
Notary Public, State of Florida  
My Commission #FF 936928  
Expires: December 14, 2019

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

C E R T I F I C A T E

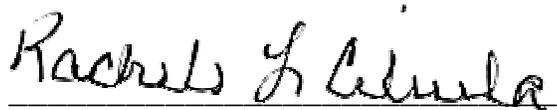
THE STATE OF FLORIDA)  
COUNTY OF PALM BEACH)

I, Rachele Lynn Cibula, Notary Public, State of  
Florida at Large,

DO HEREBY CERTIFY that I was authorized to and did  
stenographically report the foregoing deposition; and  
that the transcript is a true and correct transcription  
of the testimony given by the witness.

I FURTHER CERTIFY that I am not a relative, employee,  
attorney or counsel connected with the action, nor am I  
financially interested in the action.

Dated this 6th day of November, 2018.

  
RACHELE LYNN CIBULA, NOTARY PUBLIC

<p><b>A</b></p> <p><b>a.m</b> 43:5 125:15</p> <p><b>ability</b> 8:16,20</p> <p><b>able</b> 70:3 90:11 91:5 93:4 106:6</p> <p><b>above-styled</b> 5:7 5:8</p> <p><b>acceptable</b> 65:16</p> <p><b>acceptance</b> 64:20,25</p> <p><b>accepts</b> 65:9</p> <p><b>access</b> 38:10,15 53:25 54:14 55:2 116:18,21 117:2,6 120:19 120:20,22 133:20,23 134:8,15,18 136:16</p> <p><b>accessible</b> 116:14,23 130:6</p> <p><b>accommodate</b> 63:4,6 65:6</p> <p><b>accompany</b> 29:10</p> <p><b>accomplish</b> 86:19</p> <p><b>accomplished</b> 91:14</p> <p><b>accomplishes</b> 78:11</p> <p><b>accurate</b> 40:5</p> <p><b>accurately</b> 114:14</p> <p><b>act</b> 51:10 52:2 60:1 78:12</p> <p><b>acting</b> 109:12</p> <p><b>action</b> 1:2 5:8 86:2 87:23 98:7,20 107:17 110:19 111:1,5 112:14,25</p>	<p>113:14 116:1 124:17 139:12 139:13</p> <p><b>actions</b> 107:14</p> <p><b>activity</b> 48:18</p> <p><b>actual</b> 42:2 59:17</p> <p><b>add</b> 72:10 82:11 112:11</p> <p><b>added</b> 58:18,19</p> <p><b>addition</b> 98:22</p> <p><b>additional</b> 58:18 115:3</p> <p><b>address</b> 6:16 8:11</p> <p><b>addresses</b> 95:5</p> <p><b>adds</b> 92:23</p> <p><b>administration</b> 60:10</p> <p><b>administrative</b> 25:16 70:14</p> <p><b>Admission</b> 3:7</p> <p><b>admitted</b> 23:15</p> <p><b>adopt</b> 62:20</p> <p><b>adopted</b> 66:10 66:15 75:24 78:24 83:2 97:9</p> <p><b>adopting</b> 62:24 103:19 104:23</p> <p><b>adopts</b> 80:11</p> <p><b>advance</b> 132:21</p> <p><b>advice</b> 37:14 49:23 50:15 107:11</p> <p><b>advise</b> 37:12 111:9</p> <p><b>advising</b> 49:22</p> <p><b>advisors</b> 115:23 115:24</p> <p><b>advocacy</b> 25:5</p> <p><b>advocates</b> 125:19 126:7,9 126:10,16 127:7,11,13</p> <p><b>affect</b> 8:16,20</p>	<p>74:8</p> <p><b>affirms</b> 65:10</p> <p><b>afternoon</b> 5:18</p> <p><b>age</b> 75:16</p> <p><b>ago</b> 19:21</p> <p><b>agree</b> 40:19 136:4 137:9,14</p> <p><b>agrees</b> 79:4</p> <p><b>ahead</b> 6:24 65:19 80:3 99:5</p> <p><b>aide</b> 43:19,20 45:17</p> <p><b>align</b> 67:2 71:20 72:8 73:10</p> <p><b>aligns</b> 79:6</p> <p><b>alleged</b> 88:16 98:9,16 100:17 101:18,25 102:19 124:16 124:22</p> <p><b>alleging</b> 98:11</p> <p><b>allotted</b> 102:21</p> <p><b>allow</b> 113:12</p> <p><b>alluding</b> 135:12</p> <p><b>alternative</b> 48:24 49:9 89:24 99:6</p> <p><b>alternatives</b> 49:18</p> <p><b>ambit</b> 10:18 13:10 135:21</p> <p><b>amendment</b> 24:7,14,20,23 92:23</p> <p><b>American</b> 55:22 83:23 93:16 94:11</p> <p><b>amount</b> 99:25 100:11,22</p> <p><b>amounts</b> 106:20</p> <p><b>anonymous</b> 73:22 74:2,12 74:14 113:16 113:19</p> <p><b>answer</b> 6:19,24</p>	<p>6:25 7:5 10:23 14:15 15:1,15 16:4 27:2 36:4 38:3 51:12,14 51:16 53:3,5 56:23 63:20 65:14 68:5 69:14 70:3 72:14,23 73:25 74:1 79:21 80:16 82:8 84:16 85:12,22 86:23,25 90:19 91:20 93:19 94:5,25 95:8 99:9 105:16 130:22 131:2,2 132:11 133:1 135:1 136:23 136:24,24</p> <p><b>answered</b> 108:20 119:17 119:18</p> <p><b>answering</b> 71:2</p> <p><b>answers</b> 6:11 10:25 11:1 12:2,7,12 117:21</p> <p><b>anymore</b> 79:2</p> <p><b>anytime</b> 89:13</p> <p><b>anyway</b> 6:24 76:17 99:9</p> <p><b>apart</b> 16:7 22:23 39:6 80:19 114:21,23 121:7 127:12</p> <p><b>appeals</b> 24:3</p> <p><b>appear</b> 98:25 129:10</p> <p><b>appearance</b> 9:12 102:4</p> <p><b>APPEARAN...</b> 2:1</p> <p><b>appeared</b> 138:7</p> <p><b>appearing</b> 8:24 10:20 15:23</p>	<p><b>appears</b> 12:3 45:12 114:1,7 114:18 123:4 129:18</p> <p><b>apply</b> 49:11 104:25 105:6 105:19</p> <p><b>appoint</b> 104:14</p> <p><b>appointed</b> 97:14 103:15</p> <p><b>appointment</b> 103:18</p> <p><b>appoints</b> 97:12</p> <p><b>appropriate</b> 50:14 92:22 106:8 116:3</p> <p><b>approved</b> 27:20</p> <p><b>approximately</b> 17:4 18:12,23 21:21,25</p> <p><b>April</b> 123:10</p> <p><b>arranged</b> 40:1</p> <p><b>art</b> 44:14 67:4</p> <p><b>articles</b> 56:9</p> <p><b>articulate</b> 101:14</p> <p><b>articulates</b> 65:25</p> <p><b>articulation</b> 33:8</p> <p><b>asked</b> 7:4 20:21 20:24 21:25 22:4 31:7 50:4 52:6 71:10,11 78:5 79:21 88:19,21 90:7 90:12 91:8,10 93:12,23 94:4 94:13,15,21 119:1 121:1 129:9</p> <p><b>asking</b> 9:22 10:7 10:17 17:15 41:3 51:25 55:25 67:9 68:4 73:17</p>
---	---	--	--	--

95:3 125:19 126:8,14,15 <b>asks</b> 13:4 96:25 <b>aspect</b> 33:10 <b>aspects</b> 106:9 <b>assign</b> 28:18 <b>assigned</b> 28:21 28:23 32:8 44:4,8 47:23 101:7,9,11 115:23 <b>assignment</b> 27:11 28:19 51:2,6,7 <b>assistance</b> 28:23 32:18 33:19 64:18 <b>assistant</b> 22:9 25:15 26:1,3,4 26:6,11 27:21 28:13 96:5 118:5 <b>assistants</b> 32:7 <b>assisted</b> 30:8 <b>assisting</b> 42:4 <b>Association</b> 55:22 83:23 93:16 <b>Association's</b> 94:12 <b>associations</b> 81:17 <b>assume</b> 6:20 22:23 34:17,18 63:21 73:24 83:9 97:19 107:12 <b>assumed</b> 10:16 <b>assumes</b> 92:9 <b>assuming</b> 56:16 <b>assumption</b> 84:1 103:1 <b>assumptions</b> 86:22 <b>attachment</b> 47:8 121:14,18	122:2 <b>attachments</b> 42:19 <b>attempting</b> 91:14 <b>attend</b> 41:19 <b>attendees</b> 43:6 <b>attorney</b> 5:19 22:9,12 24:12 25:16 26:1,4 26:12 27:10,13 27:21,23,24 28:2,5,14,18 32:8 34:10 35:5 37:20 41:6,15 42:3 43:21,25 44:4 50:9,13 96:5 102:1 103:23 103:25 113:25 115:13 134:14 139:12 <b>Attorney's</b> 25:14 32:7 37:2 38:11,16 44:3,12,15 49:17 115:22 116:5,13,14 <b>attorney-client</b> 37:16 <b>attorneys</b> 2:4,9 5:19 16:18,20 32:11,12 34:5 106:4 109:8 115:25 133:17 133:25 <b>attraction</b> 62:4 62:4 <b>authenticate</b> 129:21 <b>author</b> 128:13 <b>authored</b> 128:22 <b>authority</b> 29:5 57:8,13 99:25 109:3,7 138:6 <b>authorized</b>	139:7 <b>available</b> 42:5 46:22 69:11 105:12 106:8 106:10 <b>aversive</b> 89:5,18 89:24 90:17,25 91:3,6 92:4 93:1 94:19 95:5 <b>aware</b> 12:11 13:17 35:4 37:11 46:25 100:6 104:4,7 104:16 109:22 112:18 115:5 118:20 127:12 127:24 128:2 <hr/> <b>B</b> <hr/> <b>bachelor's</b> 23:6 <b>back</b> 28:16 31:22 45:6 61:1,5 63:5 71:14 72:24 76:3 78:4 79:2 79:23 80:1,21 127:22,23 130:18 136:10 137:1,6 <b>background</b> 106:2 <b>backwards</b> 35:17 <b>ban</b> 7:17 48:25 49:9 59:16 88:22,24 89:14 90:21 92:4,20 93:25 94:1,19 94:19 95:17,18 111:14 112:2 115:1 116:6 118:13 <b>banned</b> 90:17,18 91:1,6,7 <b>banning</b> 50:5	89:17,18 92:24 92:25 93:1 <b>bans</b> 59:6 81:1 <b>Bar</b> 23:13,18 <b>Bars</b> 23:15 <b>based</b> 38:2 63:21 64:2 67:24 68:11 70:18 75:7 83:20 84:1,15 93:13 94:24 99:12 100:4 101:17 113:9 114:10,23 128:23 <b>basic</b> 82:12 <b>basically</b> 81:13 <b>Bates</b> 52:11 57:23 <b>BAY</b> 1:11 <b>Beach</b> 27:8 34:9 34:11 35:9 47:8,25 58:25 58:25 89:2 138:4 139:3 <b>began</b> 71:15 <b>beginning</b> 75:5 111:12 116:10 <b>begins</b> 9:2 <b>behalf</b> 1:8,9,11 9:12 12:7 23:20 109:12 <b>behaviors</b> 76:19 76:24,25 77:4 77:7 <b>belief</b> 98:5,6 99:16 <b>believe</b> 8:13 14:7 15:21 20:19 24:18 26:4,13 27:8 32:5,20 34:9 37:11 43:19 47:10 51:15 58:17 69:7 82:7 84:15	87:13,16 89:2 89:11 108:7 112:13 116:20 116:22 117:10 117:13 119:1 121:13,20 124:12 126:24 127:1 132:1 136:7 <b>believes</b> 75:25 76:4,17 86:8 86:12,15 87:9 <b>best</b> 17:16 62:12 75:25 79:10 102:17 <b>better</b> 86:15 95:19 <b>beyond</b> 10:21,23 16:4 57:5 98:20 134:5 135:2 <b>bias</b> 102:4,4 <b>bill</b> 30:12,12 39:2 <b>bills</b> 59:14 <b>biological</b> 71:15 71:20 72:6 73:7,9 75:22 76:3,18 77:23 78:7,10,22 79:3,6 84:14 <b>biologically</b> 66:24 67:15 79:15,17 <b>bisexual</b> 7:21 81:19 <b>bit</b> 66:22 77:6,8 82:12 88:19 90:24 <b>blue</b> 77:9 <b>Board</b> 113:12 <b>body</b> 40:22 56:25 57:11 60:2 67:2 71:20 72:7 73:9
---	--	---	---	--



87:21,25 88:2 88:3,9,14 89:2 91:1,13,15,19 91:24 93:6,17 95:11,14,19 96:5 97:9,11 97:14,25 98:5 98:7,8,13,15 98:17 99:3,6 99:11,15,21 100:10,16 101:14 102:25 103:2 104:5,23 105:12 106:11 106:15 109:8 109:22 111:1 112:8 113:7,10 113:12 115:22 116:5,13,14 118:1,24 120:2 120:18 124:2,5 124:14,15,19 124:21 126:3 127:15 128:25 131:17,23 133:24 135:23 <b>City's</b> 11:18 34:2,3 63:11 68:4,23 69:14 71:2 74:23 87:5,7,14 98:11 104:10 113:4 117:21 123:24 124:1 131:10 132:6 <b>civil</b> 1:2 24:22 100:9 104:18 <b>claimed</b> 82:20 <b>clarification</b> 27:9 89:3 90:22 95:3 <b>clarify</b> 9:21 10:11 15:18 23:3 38:23 55:15 63:3 66:18 78:5	79:14 134:19 <b>clause</b> 33:7 58:18 83:22 <b>clauses</b> 12:22 32:21,21,24 56:24 57:2,10 58:7,13,16 59:9,19,21,24 59:25 60:14,20 60:21 81:7,10 83:4,16 84:3 85:13 94:14 <b>clear</b> 56:23 73:1 80:16,24 82:3 87:24 132:2 134:4 <b>clearly</b> 108:23 <b>Clerk's</b> 131:17 <b>client</b> 37:14 49:22 50:14 62:1,5 63:5,7,8 63:8,12 64:11 65:5,7,7,10,12 65:12,24 82:21 82:23 83:2 84:8,9,12,13 84:13 86:8,11 86:13,13,15 107:11 <b>client's</b> 61:21 62:6 66:10,19 86:8,13 <b>clients</b> 1:11 37:12 <b>close</b> 74:10 <b>cloud-based</b> 116:17 <b>code</b> 24:2,5 68:24 69:6 74:24 96:4,10 96:11 98:1 100:3 107:11 107:21,25 108:4 109:4,24 111:19,25 112:8,22,23	113:7,12,13,17 114:4,5,22,25 115:8,24 117:11 121:1 124:16 <b>coercion</b> 63:25 64:7,11 <b>coercive</b> 89:9 90:3,18 91:7 <b>Colin</b> 115:13,14 115:15,23,25 116:6 <b>colleague</b> 129:23 <b>combination</b> 21:18 <b>come</b> 10:18 13:10 42:5 61:1 75:8 94:10 113:1 115:11,12,13 115:19 130:18 <b>comes</b> 16:6 62:18 65:25 80:10,20 122:15 <b>comfort</b> 61:1 <b>comfortable</b> 86:16 <b>coming</b> 33:5 <b>Commission</b> 138:20 <b>common</b> 75:12 126:18 <b>communication</b> 44:22 52:12 <b>communities</b> 52:18 53:13 54:21 55:7 <b>compare</b> 119:10 <b>compared</b> 59:11 87:12 94:19 119:2,9 120:8 132:6 <b>comparing</b> 94:18	<b>compelling</b> 56:21 <b>compensation</b> 103:4 <b>competent</b> 112:9 137:7 <b>complainant</b> 74:2,4,5,9,10 <b>complaining</b> 74:11,17 <b>complaint</b> 73:5 73:11,14,15,16 73:16,22 74:12 74:14,19,20 75:2 97:17,20 108:10,11,13 111:13 112:25 113:19 115:11 115:19 <b>complete</b> 95:17 <b>completely</b> 29:9 95:1 99:8 <b>complicated</b> 98:3 107:13 111:10,14 112:3,6 <b>complied</b> 131:23 <b>comply</b> 93:4 <b>comprehensive</b> 50:15 <b>comprehensiv...</b> 50:4 <b>computer</b> 116:13 122:7 122:13 <b>computers</b> 120:20 <b>concepts</b> 64:9 84:25 85:1,2,6 <b>concern</b> 47:15 <b>concerning</b> 47:13 <b>concerns</b> 123:16 123:21 124:9 125:4 <b>conclude</b> 59:19	<b>concluded</b> 137:24 <b>conclusion</b> 72:11 119:20 <b>condition</b> 8:19 <b>conduit</b> 39:6 <b>conduits</b> 38:20 <b>confirm</b> 9:3 131:15 <b>confirmation</b> 103:17,19 <b>confirmed</b> 97:14 <b>conflict</b> 101:20 102:5 <b>conflicts</b> 102:10 <b>confused</b> 64:23 77:6 <b>confusion</b> 62:15 <b>connected</b> 139:12 <b>connection</b> 20:20 29:21 39:9 40:8,15 48:2 52:25 99:6 104:13 <b>consent</b> 64:7,11 <b>consented</b> 64:1 64:1 <b>Conservatively</b> 17:14 <b>consider</b> 40:14 48:21,24 49:5 49:14 57:18 75:6 86:17 89:17 97:22 103:11 106:4 111:13 112:1,8 113:2 <b>consideration</b> 40:22 83:7 84:5 105:18 <b>considerations</b> 4:6 40:22 75:7 102:11 128:8 <b>considered</b> 40:8 40:11,19 41:1
--	---	---	--	---

41:1,3 48:12 48:14 50:7 55:17 56:25 57:1 69:9 74:18 76:8 83:13 88:8 89:21 90:8 106:9,15,16 128:24 <b>consisted</b> 22:5 <b>consistent</b> 46:14 <b>constituents</b> 1:11 <b>constituted</b> 70:22 <b>constitutes</b> 87:3 <b>Constitutional</b> 102:3 <b>constraints</b> 108:18 <b>consult</b> 70:15 107:14 108:5,6 108:12 109:13 111:5,11 113:5 <b>consultation</b> 98:2 101:18,25 102:19 <b>consulted</b> 108:21 <b>consulting</b> 109:9 112:10,12 113:14 <b>contact</b> 121:4 <b>contacted</b> 134:20 <b>contacting</b> 126:14 <b>contain</b> 118:22 120:1 <b>contained</b> 33:6 117:21 <b>contemplates</b> 97:21 <b>content</b> 30:7 33:13,13,25 34:24 45:3	125:22 129:13 <b>contents</b> 14:9 130:8 <b>contest</b> 100:13 <b>context</b> 64:23 71:9 73:4 74:14 98:13,21 <b>continue</b> 7:7 71:2 <b>CONTINUED</b> 4:1 <b>continuing</b> 5:21 80:2 <b>control</b> 57:11 134:11,14 <b>controlling</b> 68:21 <b>conversation</b> 34:20 123:18 124:6,25 127:10 <b>conversations</b> 34:23,25 35:4 112:15 123:22 130:25 <b>conversion</b> 4:6 7:16,17 8:5 43:4 45:25 47:7 48:2,25 49:2,11 50:5,8 51:9 52:18,22 53:8 56:2 58:2 58:5,6 59:16 61:9 64:8,15 64:16 72:19 83:17,20,25 88:22,25 89:1 89:15,17 90:21 91:1,23 92:5 92:20 93:9 95:18 96:19,24 97:17 100:24 101:4,21 102:13,22 104:14 105:9 107:4,5,22	108:8,11,23 111:14 112:2,9 112:22 113:11 114:4,18 115:1 115:9 116:5 117:15 118:12 120:16 123:8 126:1 128:9 129:11 <b>convey</b> 55:2 108:9 <b>Cooley</b> 22:18,19 <b>cope</b> 76:12 <b>copied</b> 123:17 <b>copies</b> 14:6 127:8 <b>coping</b> 64:21 <b>copy</b> 11:18 123:2,6,8 127:4 <b>Coralane</b> 130:23 <b>correct</b> 10:1,5 11:3,6 12:6 13:22 23:9 29:11 30:3 31:13,14 35:13 35:20,21 39:5 39:10,17 40:4 41:16 42:12 45:10 46:16 52:15 54:5,6 82:10 86:16 88:23 94:21 96:20 98:12 102:14 103:1 105:2 106:14 109:20 116:15 117:17,22 122:4 139:9 <b>correction</b> 10:13 131:16 <b>correctly</b> 14:18 43:10 58:10 61:14 123:11 133:12	<b>correspondence</b> 14:7 <b>COT</b> 42:15 47:5 51:2 52:11 57:23 123:1 125:10 128:7 129:3 <b>council</b> 4:9 26:10 27:9 29:5,7,17,24 30:2,18,22 34:7 35:16,20 37:2,8,21,24 38:1,10,12,14 38:18,24 39:1 39:7,8,17,18 40:2,6,8,18,19 40:24,25 41:1 41:4,11,14,21 42:6 45:20 46:3,16,18 49:9,14,16,19 49:20 50:2,18 50:20 51:18,21 57:11,15,18 60:2 88:20 89:16,22 90:2 90:13,23 91:25 92:2,16,19,21 93:3,5 94:6,10 94:17,22,24 95:6,11,14,16 95:20,22 97:15 105:13,20 106:15,23 125:19 126:4,8 126:20 127:15 129:5,9 <b>councilman</b> 43:4,7 92:16 <b>councilman's</b> 27:12 <b>counsel</b> 2:2 13:4 13:16 72:11 118:7 139:12 <b>counsel's</b> 118:5	<b>counseling</b> 25:11 61:10,23 64:18,19 111:22 <b>counselor</b> 62:5 73:8,8 <b>county</b> 5:4 24:5 34:9 35:10 58:25 104:19 138:4 139:3 <b>couple</b> 7:9 47:23 <b>coupled</b> 136:15 <b>course</b> 29:4 33:7 37:18 40:21 49:15 52:5 96:1 99:24 113:25 118:9 131:13 <b>court</b> 1:1 5:8,9 9:8 13:6 21:13 24:5 78:3 80:1 104:19,19 119:8 127:23 130:10 131:13 132:25 133:6 137:1 <b>Court's</b> 13:17 118:10 <b>cover</b> 96:4 114:3 <b>covered</b> 8:7 53:12 55:5 56:17 89:20,24 <b>crack</b> 27:3 <b>create</b> 122:11 <b>created</b> 36:24 39:24 122:3,6 <b>creates</b> 65:23 <b>creating</b> 48:25 53:19 <b>Crew</b> 130:12,12 131:17 133:3 <b>critical</b> 83:18 <b>cross-gender</b> 76:6,7 <b>crux</b> 63:2 <b>cumulative</b> 6:1
--	--	---	---	---

<p><b>curable</b> 124:15  <b>cure</b> 98:16,18                  124:17,20,24  <b>current</b> 25:15  <b>currently</b> 8:15                  12:11 101:7                  102:22,24                  104:9  <b>custodians</b> 13:8                  13:8,18 14:1                  14:12 15:4,7                  118:3,11,16,25                  120:4 133:12                  134:9,20                  136:16  <b>custody</b> 14:11                  118:15 120:3                  134:11,14  <b>cut</b> 132:6</p> <hr/> <p style="text-align: center;"><b>D</b></p> <p><b>D</b> 9:9  <b>d/b/a</b> 1:10  <b>dash</b> 43:3  <b>date</b> 1:23 46:20                  96:15 98:23                  109:17 118:11                  126:4 130:9  <b>dated</b> 3:10,13,16                  3:18,21,23 4:4                  42:17 45:13                  47:6 51:1                  52:10 57:22                  125:14 139:14  <b>dates</b> 26:8 28:10                  118:4  <b>David</b> 1:9 2:13                  16:21,22 137:6  <b>David.harvey...</b>                  2:14  <b>day</b> 5:25 11:7                  60:19 110:3                  138:10 139:14  <b>day-to-day</b>                  111:24  <b>deal</b> 16:5 112:9</p>	<p>137:5  <b>dealing</b> 112:4,5                  112:6  <b>deals</b> 111:19  <b>debate</b> 95:16  <b>debated</b> 95:16  <b>December</b>                  138:21  <b>decide</b> 74:25                  94:22 101:22                  109:13 113:20                  113:21 116:3  <b>decided</b> 101:8  <b>deciding</b> 40:14  <b>decision</b> 44:25                  52:1 75:6 81:8                  81:23 87:6                  101:24 105:8,8                  105:13 107:25                  108:1  <b>decisions</b> 24:2                  75:4  <b>declares</b> 124:2  <b>declaring</b>                  124:18  <b>deemed</b> 118:14                  118:24  <b>default</b> 69:2,3  <b>Defendant</b> 3:6                  5:22  <b>Defendants</b> 1:17  <b>deficiencies</b>                  82:18  <b>deficiency</b> 81:21                  84:11 85:5                  86:10 87:11  <b>define</b> 70:5                  76:25  <b>defined</b> 67:22                  68:24 69:1,2                  72:19  <b>defines</b> 71:17                  93:9  <b>defining</b> 40:10                  81:23 82:2  <b>definition</b> 64:7</p>	<p>64:16 68:14,20                  68:21 69:4,17                  69:18,20,21,24                  70:1,3,9,11,20                  71:1 77:1,3  <b>definitions</b> 7:9                  53:12 59:15                  61:8 64:15                  67:4  <b>degree</b> 22:24,25                  23:1,6,9  <b>degrees</b> 23:4,11  <b>delineated</b> 10:20  <b>delivered</b> 11:12                  29:23,24 31:5                  40:6 51:11  <b>demolish</b> 110:18                  110:22  <b>DEO</b> 1:10  <b>department</b>                  30:15 48:9                  50:12 53:25                  54:1,8,8,13,14                  74:25 89:23                  90:2,6,11,14                  90:16,20 91:5                  92:6,15 93:4                  93:22 94:8,20                  94:23 95:4,9                  96:10,12 98:2                  101:16,22                  102:11,15                  106:13 107:12                  107:21 108:2                  108:10 109:4                  109:24 111:10                  111:20,25                  112:9,16 113:3                  113:15,18                  115:24 116:21                  117:12 129:6                  129:10 130:7                  130:13 133:23  <b>department's</b>                  117:1 131:20  <b>departments</b></p>	<p>116:22,24  <b>depend</b> 29:15  <b>dependent</b>                  73:15 111:2  <b>depends</b> 40:10                  71:8 87:8,15  <b>depicting</b>                  114:14  <b>deposition</b> 1:19                  5:1,6,21 6:3,5                  8:25 81:4 96:2                  114:1 124:5                  139:8  <b>description</b>                  104:5  <b>descriptions</b>                  55:6  <b>designated</b> 9:4                  10:19 44:17  <b>designating</b>                  13:18  <b>designation</b> 26:7                  102:23  <b>designee</b> 8:24                  68:4 69:14                  131:10  <b>desire</b> 65:8                  84:12 87:12  <b>desired</b> 82:21                  84:9  <b>desires</b> 82:6  <b>desist</b> 75:15  <b>desistance</b> 76:1                  76:6 77:14,18                  77:20  <b>desktop</b> 122:21  <b>detail</b> 95:13  <b>detailed</b> 94:9  <b>details</b> 113:19                  116:24  <b>deter</b> 91:14  <b>determination</b>                  70:10 81:8                  83:1 84:22                  100:4 101:3                  105:18 108:16</p>	<p>108:17 112:24                  113:4,8  <b>determine</b> 63:24                  70:18,20 83:8                  83:11 84:5                  85:25 99:25                  100:15,19,21                  102:17 113:13                  121:17 128:20                  129:13  <b>determined</b> 45:5                  68:18,19 86:3                  91:15 98:1,3                  98:14 99:15                  101:16 108:21                  113:10 120:2                  124:19 135:20  <b>determines</b> 66:9                  98:5,17 99:3                  101:10  <b>determining</b>                  61:18 70:17                  73:12 83:5                  85:13 108:13  <b>developed</b> 108:8  <b>developing</b>                  37:18  <b>development</b>                  64:22 65:1  <b>device</b> 116:17  <b>dictionary</b> 67:25                  68:1,21 69:10                  70:11,20 71:1                  71:9 77:1,3  <b>difference</b> 79:13  <b>different</b> 11:1                  17:19 38:6,7                  48:11 66:22                  72:22,23 77:20                  77:22,23 78:19                  90:12,15 101:6                  101:7 119:16                  124:1 132:5                  135:22  <b>difficult</b> 72:25  <b>direct</b> 3:3 5:16</p>
--	--	--	--	--

25:19,21 26:14 94:7 96:23 133:4 135:5,10 137:5 <b>directed</b> 31:22 34:6 49:13 89:1 90:20,21 94:17 105:21 <b>directing</b> 50:11 <b>direction</b> 35:24 94:24 <b>directions</b> 133:13 <b>directive</b> 109:3 109:23 111:4 112:19 115:9 <b>directly</b> 28:14 43:24 <b>disagree</b> 10:4,9 10:13 135:22 <b>disclose</b> 13:11 <b>discovery</b> 11:20 12:12 13:6,17 13:19 117:20 117:22 118:1,3 118:8 120:7 129:3 131:24 132:4 <b>discretion</b> 28:18 75:1 98:8 99:4 99:12 108:5 116:3 <b>discuss</b> 33:11,21 45:25 46:4,16 52:3 90:25 137:11 <b>discussed</b> 33:25 53:6 75:17 95:12,15 106:23 123:24 <b>discussing</b> 30:9 <b>discussion</b> 32:22 33:1,2 34:5 36:21 48:5,7 48:11 53:7 89:5,11 105:20	106:1,17 <b>discussions</b> 118:7 132:4 <b>disease</b> 81:21 82:22 84:10,21 85:4 86:10 <b>diseases</b> 82:17 <b>disorder</b> 81:21 82:22 84:2,10 84:21 85:4,19 86:10 <b>disorders</b> 82:17 <b>disputes</b> 132:3 <b>distinction</b> 79:12 <b>distinguish</b> 91:18 93:9 <b>distress</b> 63:7 <b>distribute</b> 128:1 <b>distributing</b> 121:4 <b>District</b> 1:1,1 12:24 16:10 24:15 <b>division</b> 1:2,16 25:16,17 115:18 <b>doctor</b> 102:6 <b>document</b> 11:20 13:18 20:20 29:1,10,18 35:22 42:7,22 43:12 45:5 47:4,9 54:13 57:17 96:1,6,8 97:21,22 113:23 114:6 114:11 117:25 119:12 120:11 121:24 122:22 128:7,10,20 129:3,6,14 131:13 133:25 134:14 <b>documents</b> 12:15,23 13:3	13:7,9 14:5,11 14:14,17,19,22 15:2,5,8,11,22 16:8,10 20:22 21:1,9,12,21 22:1 116:18 118:6,12,20 119:4,19,25 120:13 121:8 121:22 122:10 131:11,20 132:8,17,23 133:2,15,15 134:1,10,21 135:11 136:20 137:9 <b>doing</b> 57:7 83:10 <b>dollars</b> 100:18 <b>door</b> 74:21 132:15 <b>draft</b> 31:23,25 32:2,19 33:13 33:18 34:1 35:12,15,19,22 36:5,23 57:14 58:7,12,15 59:23 89:23 90:3,12,20 91:6 105:17 114:7,19 125:18,19,25 126:1,2,8,14 126:15,19,23 126:24 127:25 129:10,12 <b>drafted</b> 26:23 32:20 90:14,17 90:20 128:25 <b>drafter</b> 26:24 <b>drafting</b> 26:18 26:21 27:2,5 28:16,19,22 31:15 32:16 33:18,25 34:22 47:21 49:16 52:25	<b>drafts</b> 36:1 127:14 <b>draw</b> 40:16 <b>drive</b> 54:12 116:13 117:3,7 122:12 <b>drives</b> 116:23 <b>due</b> 100:6,14 102:3 <b>duly</b> 5:13 138:8 <b>dysphoria</b> 75:14 75:15,23 76:2 81:6 <hr/> <b>E</b> <b>E</b> 139:1,1 <b>e-mail</b> 3:10,13 3:15,18,20,23 4:3 42:21 44:11,11 45:12 47:12,13 50:25 51:3,5 52:9,14 53:4 55:6 57:21,24 58:1 58:21 60:17 120:23 121:3 121:14,18 123:1,7,17,18 124:10 125:1 125:10,20,21 125:22 127:3 127:10,12 135:1 <b>e-mailed</b> 120:17 120:22 121:6 122:19 <b>e-mails</b> 14:7 44:16 120:15 121:15 <b>earlier</b> 20:10 54:15 58:17 88:20 114:7,19 116:12 119:2 119:12,17 120:21 123:4,7 124:14 125:11	<b>earliest</b> 125:13 <b>earn</b> 23:6 <b>East</b> 2:12 8:12 <b>Edition</b> 68:11 <b>education</b> 22:24 23:2 25:10 <b>efforts</b> 7:24 8:2 52:20 53:11 <b>either</b> 15:16 41:14 109:18 115:12 <b>elaborate</b> 88:25 92:11 105:16 <b>elect</b> 99:6 <b>electronic</b> 21:19 21:20 22:2 54:16 <b>electronically</b> 21:17 <b>eleven-sevente...</b> 125:14 <b>eliminating</b> 91:14 <b>Email</b> 2:5,6,10 2:14 <b>embrace</b> 67:1 71:19 72:7 73:9 <b>emphasize</b> 109:9 <b>employed</b> 102:25 <b>employee</b> 139:11 <b>employees</b> 103:2 103:11 <b>employment</b> 34:2 <b>employs</b> 101:2 <b>enacted</b> 36:25 49:10 50:6 60:20,22 89:16 <b>enactment</b> 25:4 25:8 26:11 36:13 37:20 40:9,15,21
---	--	--	--	--

89:15 96:17 <b>encouraged</b> 73:8 <b>encouragement</b> 71:25,25 72:22 <b>encourages</b> 72:6 76:18 <b>encouraging</b> 67:1 71:18 78:11 <b>ended</b> 53:7 <b>enforce</b> 60:10 97:6 <b>enforced</b> 96:25 97:18 <b>enforcement</b> 20:3 24:3,5 36:21,22 48:6 48:11,19 50:8 51:8 69:16 73:4 74:19,25 75:4 83:11 85:23 87:6,22 96:4,10,12 97:8,15 98:1 100:3,8 105:9 105:11 106:1,2 106:3,8,10,19 107:9,11,17,21 107:25 108:4 109:4,24 111:25 112:8 112:22,23 113:7,12,13,18 114:4,5,22,25 115:8,24 117:12 121:1 123:16,21,25 124:7,9,16 125:4 <b>enforcement-...</b> 106:3 <b>enforcing</b> 78:16 <b>engage</b> 23:20 48:17 <b>engages</b> 79:4	<b>Enhancement</b> 1:16 <b>enter</b> 84:22 <b>enters</b> 65:5 <b>entire</b> 21:14 26:12 93:25 109:4 110:3 130:8 134:3,25 <b>entirely</b> 67:19 85:11 <b>entitled</b> 11:11 100:7,13 <b>entity</b> 24:17 <b>entrusting</b> 113:7 <b>envisioned</b> 78:12 <b>Equality</b> 34:23 35:3 <b>Erin</b> 4:3 32:3,4 35:23 125:12 <b>Ernest</b> 3:13,15 3:18,20,23 4:4 4:8 27:21 28:21 29:25 31:9 32:3,11 35:24 43:7 47:7 50:9 52:11,25 57:16 57:22 105:17 106:2 116:18 117:2 123:2,5 125:14 128:21 129:1,5 <b>Ernie</b> 16:19 18:18 30:9 34:4,20,21 45:25 47:23 50:19 55:1 123:14,23 124:4 129:19 <b>Ernie's</b> 51:6 <b>errata</b> 11:8 <b>ESQUIRE</b> 1:19 2:5,6,10,13 3:2 5:1,12 <b>essentially</b> 75:14	98:18 126:25 <b>establish</b> 56:20 132:7 <b>established</b> 130:10 <b>establishing</b> 56:24 88:1 <b>estimate</b> 18:8 37:7 <b>estimates</b> 17:12 17:12 <b>estimating</b> 18:6 <b>et</b> 75:11 <b>ethics</b> 102:9 <b>everybody</b> 133:22,23 134:13,15 <b>everyday</b> 111:25 <b>everyone's</b> 100:7 <b>evidence</b> 78:18 88:4,13,14 104:18,21,25 105:6 106:6 108:14,19 <b>evidentiary</b> 105:3 112:6 <b>exactly</b> 15:16 34:16 35:14 56:12 67:9 71:11 96:17 98:10 127:1,2 <b>exam</b> 23:13 83:9 <b>EXAMINATI...</b> 3:3 5:16 <b>examine</b> 49:9 <b>examining</b> 123:15 <b>example</b> 17:22 34:23 39:2 49:10 60:12 65:3 74:12 89:18 90:16 94:12,20 97:16 101:25 102:7 103:23 111:3	<b>examples</b> 111:4 <b>exclude</b> 9:8 <b>executive</b> 43:19 43:20,21 <b>exemptions</b> 44:23 <b>exercising</b> 98:7 <b>exhibit</b> 3:5,9,12 3:14,17,19,22 4:2,5,7 9:1 11:14,16 27:18 27:18 42:8,9 47:2,4 50:23 50:25 52:7,9 57:19,21 61:4 81:15 95:25,25 113:24 114:3,6 114:11,12,13 114:16,23 117:10 120:12 121:12 122:23 122:24 125:7,9 128:4,5,16,17 128:19 129:2 <b>EXHIBITS</b> 3:4 4:1 <b>exist</b> 121:16,23 <b>exists</b> 122:1 <b>expect</b> 113:17 113:20 <b>experience</b> 101:17 <b>experiences</b> 75:13 <b>experiencing</b> 63:8 75:23 <b>Expires</b> 138:21 <b>explain</b> 94:15 <b>explaining</b> 124:13 <b>explicitly</b> 69:5 104:24 <b>explore</b> 88:20 <b>expressed</b> 63:9 66:24 67:17 71:16 84:8	85:2 <b>expresses</b> 65:8 71:19 78:25 <b>expression</b> 71:12 <b>extensive</b> 60:3 <b>extent</b> 10:21 13:9 38:21 40:23 43:13 62:10 63:25 71:5 75:23 88:12 89:20 107:13 122:20 131:24 133:2 134:2 137:8
<b>F</b>				
<b>F</b> 139:1				
<b>facets</b> 49:24				
<b>facilitates</b> 64:21				
<b>fact</b> 21:6 56:21 58:15 83:21 85:24 98:4 99:21,23 100:20 126:22 130:16 136:16				
<b>facts</b> 8:17,20 63:22 70:15,16 70:16,22 78:17 85:24 87:22,25 88:2,2,8,12 106:5 110:24				
<b>factual</b> 10:14 12:11 72:11 117:20 132:8				
<b>factually</b> 10:12				
<b>fair</b> 10:22 15:19 38:9 40:13 41:10 78:5 92:17 119:21 137:15				
<b>fairly</b> 40:7,18 114:14				
<b>fall</b> 15:9 44:22				
<b>familiar</b> 42:23 47:25 77:20				

125:22 129:20 <b>far</b> 37:15,16 54:6 55:23 67:12,15 92:3 106:15 107:8 112:18 117:1 <b>Fax</b> 2:4 <b>February</b> 42:17 43:5 45:13 47:6 51:1 52:10 57:22 <b>feel</b> 51:25 52:3 53:12 57:6 85:10 <b>feelings</b> 76:7,13 <b>felt</b> 50:14 56:19 57:4 75:2 <b>female</b> 66:24 67:17 71:16,19 72:7 73:7 75:24 79:3,6 80:9 82:5 86:14 <b>FF</b> 138:20 <b>fifteen</b> 17:8 18:24 <b>figure</b> 40:16 133:5 137:8 <b>file</b> 12:19 14:4,5 14:10,10,24 15:9,12,22 16:2,7 21:14 21:17,22 54:15 54:16 55:1 117:15,15 118:9,13,21,21 119:2,11,13,19 119:25 120:8 120:14,15,16 121:9,13,14,16 121:18,22 122:18 133:25 <b>files</b> 20:22 22:5 42:20 116:19 116:25 117:3,6 <b>final</b> 36:1,7	56:18 <b>financially</b> 139:13 <b>find</b> 9:1 45:24 65:16 85:24 91:21 97:3 110:10 136:12 136:12 <b>finder</b> 99:21 <b>finding</b> 77:5 93:17 99:23 133:14 <b>findings</b> 60:1,3 93:18 <b>fine</b> 83:8 99:21 99:25 100:3,11 100:21 106:20 <b>finish</b> 130:17 135:21 <b>first</b> 3:7 5:13 6:2 24:6,14,20,23 26:9 27:3 31:21,24 32:17 33:18 35:18 36:13,24,24 42:16,22 44:9 53:23 57:14 81:13 83:1 85:15 87:17 88:10 97:5,25 107:16 110:25 113:15 115:10 123:9 126:6 137:17 <b>firsthand</b> 74:16 <b>fit</b> 84:25 <b>five</b> 17:5,13,13 17:14 61:9 129:23 <b>flagging</b> 44:19 <b>flat</b> 63:20 <b>flip</b> 43:2 107:3 <b>Florida</b> 1:1,14 1:24 2:3,8,12 5:3,5 8:13 22:21 23:13	30:11 34:23 35:3 60:21 97:10 110:14 124:8 138:3,20 139:2,6 <b>Florida's</b> 3:6 <b>focus</b> 76:19 <b>folder</b> 53:20,23 58:6 121:24 <b>folders</b> 116:25 <b>follow</b> 13:16 21:6 49:21 58:24 73:21 87:5 90:22 97:12 <b>follow-up</b> 39:19 40:1 <b>followed</b> 50:13 93:14 <b>following</b> 30:20 31:11 67:12 120:24 <b>follows</b> 5:14 115:9 <b>force</b> 93:17 94:12 <b>foregoing</b> 139:8 <b>forgive</b> 6:1 <b>form</b> 31:23,23 35:16,19 62:8 71:22 <b>formal</b> 49:8 104:24 105:6 116:4,8 <b>formalized</b> 112:17 <b>formally</b> 49:13 53:22 <b>FORMAN</b> 2:7 <b>format</b> 43:12 94:9 128:12 <b>forms</b> 91:2 <b>forth</b> 72:25 78:4 <b>forthcoming</b> 135:6 <b>forty-six</b> 11:24	11:25 <b>forum</b> 116:2 <b>forward</b> 31:21 62:21 70:17 81:19 94:22 123:14 <b>foundation</b> 72:12 <b>four</b> 18:4 59:4 <b>Franklin</b> 1:23 5:3 <b>free</b> 85:10 <b>Freedoms</b> 51:10 <b>Friday</b> 137:6,18 <b>front</b> 9:1 61:5 98:25 100:14 124:22 <b>fundamental</b> 100:6 <b>further</b> 60:7 105:16 110:23 112:25 135:4 137:20 139:11	128:3,6,15,18 129:22 130:2,5 130:17 131:4,7 131:8 132:15 137:20 <b>gather</b> 108:16 <b>gathering</b> 88:4 88:14 108:18 <b>gay</b> 7:20 81:19 <b>gender</b> 8:2 61:12,17,25 64:19 66:6,11 66:14,16,25 67:2,17,20,22 68:9,14,17,20 69:18,19 70:4 70:5,7 71:12 71:16,17,19,21 72:2,8,17,21 73:10 75:14,15 75:23,24 76:1 76:3,20,25 77:2,4,8,11,23 77:23 78:1,24 79:3,6 80:11 80:17,20,21,22 80:25 81:6,20 82:5,7,9,13,20 82:21 84:9,14 84:16,20,23 85:8 86:14 87:2,10 89:6 <b>general</b> 6:23 37:23 38:9 49:15 51:15 53:6 68:23 69:3 101:5 111:9 <b>generally</b> 8:6 9:14 13:17 24:22 31:5 33:16 37:5,13 51:23 53:9 59:11,13,15 60:23 70:7 88:24 90:10
--	--	---	--	---

<p>101:15 102:14 102:15 105:24 135:12 <b>gentleman</b> 130:12 <b>getting</b> 28:16 36:23 54:3 <b>GICE</b> 8:1,6 <b>girl</b> 76:19 77:15 77:18 78:7,9 78:20,21,23 79:17 <b>gist</b> 54:24 <b>give</b> 11:1,5 21:15 45:24 50:14 60:12 62:12 65:15 66:22 79:10 86:12 98:16,18 98:24 103:8 113:18 114:10 124:16 127:25 <b>given</b> 6:2 30:14 31:7 67:2 82:6 102:23 109:3 110:3 114:20 139:10 <b>giving</b> 51:6 65:11 <b>glad</b> 10:15 <b>GLORIA</b> 1:10 <b>go</b> 5:23 6:24 7:9 19:10 31:24 37:15 41:25 45:6 61:8 65:19 72:24 73:12 80:3 92:3 99:4 100:14,19,24 110:5 128:21 130:3 133:10 133:17 136:10 <b>goal</b> 61:11,16,18 61:20,21,24 62:6,18,19,21 62:25 63:4,6,9</p>	<p>63:12 64:4 65:4,6,10,20 65:22,23,25 66:1,3,6,10,13 66:15,19 72:2 72:5,16,21 73:2 76:13,16 77:13,17,19 78:1,8,15,18 80:9,10,11,12 80:17,22,24 82:2,3,6,9,13 83:8,12,15 84:16,22 85:7 86:12,14,19 87:2,23,24 88:1,6 91:13 122:16 <b>goals</b> 63:25 80:8 81:23 <b>God</b> 134:1 <b>going</b> 5:21 11:14 14:16 15:16 16:15 19:10 20:1 27:11 39:1 42:7 43:2 44:21 45:6 51:5 52:2,4,4 54:25 61:13 63:22 65:11 71:5,5,14 76:17 83:4 95:24 96:23 100:1 107:13 112:7 113:4,6 122:17,22,22 125:9 126:3,3 126:5,25 128:15 129:2 129:22 131:9 137:1,4 <b>good</b> 5:18 11:7 19:12 39:12 67:15 79:24 104:3 129:4 131:1</p>	<p><b>governs</b> 13:6 <b>Gowartz</b> 20:17 <b>graduate</b> 22:15 <b>greater</b> 95:12 <b>ground</b> 5:24 <b>group</b> 100:25 <b>guess</b> 15:19 16:5 17:9 18:14 23:3 27:1 29:6 38:19 40:11 54:3 55:15 60:7 71:8 83:9 91:20 93:19 103:13 <b>guidance</b> 70:19 90:22 <b>guide</b> 60:8 81:7 81:23 102:8 108:12 129:18 <b>Guido</b> 136:1 <b>guys</b> 42:1</p> <hr/> <p style="text-align: center;"><b>H</b></p> <hr/> <p><b>H</b> 1:9 <b>H-v-i-z-d</b> 34:13 <b>halfway</b> 123:4 <b>hallway</b> 126:12 127:4 <b>hand</b> 5:9 50:1 85:6 125:9 128:15 138:10 <b>handed</b> 114:17 <b>handing</b> 128:4 <b>handle</b> 24:4 <b>happen</b> 76:17 92:10 <b>happened</b> 16:2 28:19 37:11 74:22 91:1 96:14 134:20 <b>happening</b> 12:24 <b>happens</b> 76:5 110:22 <b>happy</b> 75:18,19 92:10</p>	<p><b>hard</b> 23:5 <b>harm</b> 91:16 113:11 <b>harmful</b> 83:18 91:15 <b>Harvey</b> 2:13 16:21,22 17:21 17:24 20:7,13 133:8,11,22 134:4,12,19,24 <b>head</b> 59:2 68:2 107:25 130:13 131:6 133:10 <b>health</b> 25:11 81:17 83:18 104:11,15 111:22,23 <b>hear</b> 10:3 101:5 101:15 102:12 102:18 137:16 <b>heard</b> 19:3 101:1,23 130:5 <b>hearing</b> 31:10 31:12,12 40:20 50:21 94:16 98:23,24,25 99:1,1,5,19 106:25 125:20 126:8 132:21 133:7 <b>hearings</b> 105:7 105:25 106:18 106:18 <b>hearsay</b> 74:16 <b>HEARTS</b> 1:10 <b>Heather</b> 3:10 42:16 43:6,16 45:13 <b>held</b> 114:24 118:24 <b>Helene</b> 3:23 34:13 123:2,5 <b>help</b> 27:3 60:8 63:10 65:7,12 73:18 76:6 79:4,4,5 82:4</p>	<p>92:11,15 108:12 129:13 <b>helpful</b> 57:7 108:10,21 109:1 <b>helping</b> 24:14,16 24:19 76:12 <b>Henao</b> 3:13,16 47:6,17 51:1 51:11 <b>Henriquez</b> 125:24 <b>hereinafter</b> 5:14 <b>Herlein</b> 3:10 42:16 43:6,16 43:24 45:13 <b>Herlene</b> 42:16 <b>hey</b> 38:25 45:23 93:23 <b>high</b> 22:25 <b>highlighted</b> 87:17 <b>highly</b> 19:13 <b>Hillsborough</b> 5:5 <b>Hmihet@lc.org</b> 2:5 <b>Hoch</b> 35:9 <b>hold</b> 23:17 95:16 115:3 <b>home</b> 110:13,18 110:23 <b>Homeless</b> 24:13 24:14,16,16,18 24:19 <b>homosexual</b> 84:3 <b>homosexuality</b> 84:1,20 85:19 87:10 <b>hopefully</b> 30:20 137:16 <b>HORATIO</b> 2:5 <b>hour</b> 17:8,14 18:7,10 <b>hours</b> 17:14</p>
--	---	---	---	--

18:11 <b>House</b> 56:9 <b>Hvzd</b> 3:23 34:12,14,15 123:2,5,7,20 123:23 124:10 125:3 <b>hypo</b> 62:19 63:21 <b>hypos</b> 80:5 81:12 <b>hypothetical</b> 62:10,23 71:14 71:23 72:10,12 73:6 75:22 77:13 78:6,19 79:8,9,12,13 79:15,16,18 82:1,4,12,19 84:7,15 85:21 85:22 86:21 92:9,13 93:13 <b>hypotheticals</b> 77:6	<b>identifies</b> 72:7 73:7 76:19 78:7,10 <b>identify</b> 43:13 70:4 74:14 93:12 <b>identifying</b> 77:15,18 78:9 78:23 <b>identity</b> 8:2 61:12,18,25 66:7,11,14,16 66:25 67:18,20 67:22 68:9,14 68:17,20 69:18 69:19 70:5,8 71:13,16,17,19 72:3,18,21 75:24 76:4,7 76:14,25 77:2 77:5,8,11 78:15,24 79:3 79:6 80:11,13 80:17,20,21,22 81:1 82:5,7,9 82:14,20,21 84:9,14,17,20 84:23 85:8 86:14 87:10,25 89:7 <b>illness</b> 81:21 82:22 84:10,21 85:5 86:10 <b>illnesses</b> 82:17 <b>immediately</b> 98:19 100:10 124:22 130:24 132:20,24 133:5 135:24 <b>impartial</b> 102:18 <b>imperfect</b> 136:2 137:14 <b>implication</b> 45:2 <b>importance</b> 109:9	<b>important</b> 6:7 6:11 33:10 81:22 85:14,16 85:16 <b>impose</b> 99:21 <b>imprecise</b> 62:9 <b>improper</b> 39:4 62:11 71:23 72:13 79:9 92:9 <b>inaccurate</b> 12:12 <b>include</b> 64:17 73:18 77:3 88:2,9 91:2 113:2 121:11 <b>included</b> 33:19 50:17 56:18,19 60:14,24 90:23 121:13 <b>includes</b> 72:11 91:23 96:18 107:21 <b>including</b> 51:8 83:24 <b>incompetent</b> 86:21 <b>incomplete</b> 62:11 72:13 79:8 86:21 <b>incurable</b> 98:17 <b>independent</b> 99:20 <b>INDEX</b> 3:1 <b>indicate</b> 107:8 128:12 <b>indicating</b> 99:15 <b>individual</b> 37:2 37:8,21,25 40:24 41:11 46:3,15 92:16 <b>individual's</b> 61:12,17,25 72:17 80:25 <b>individually</b> 1:8 1:9,11	<b>individuals</b> 135:5 <b>informal</b> 116:4 <b>information</b> 29:16 30:21 31:7 37:25 38:1,8,11,16 40:6,7,18,23 41:1 50:16 51:17,20,24 60:4,6,13 73:5 73:11 74:15 75:12 81:3 82:24 108:15 113:17 <b>informed</b> 45:2 <b>initial</b> 50:17 89:14 100:4 105:17 110:20 112:24 113:8 <b>initially</b> 66:19 105:9 122:3 <b>initials</b> 7:23 8:1 <b>initiated</b> 50:6 66:20 97:19 <b>initiative</b> 49:18 <b>injury</b> 8:19 <b>Innovation</b> 54:8 <b>inquires</b> 135:5 <b>instance</b> 1:20 5:7 <b>instances</b> 78:17 <b>instructions</b> 21:6 <b>intended</b> 90:23 <b>intent</b> 44:19 <b>intents</b> 33:9 60:9 <b>interchangeably</b> 61:10 <b>interest</b> 56:21 76:1 101:20 102:5 <b>interested</b> 121:5 139:13 <b>intern</b> 47:18,19 51:6	<b>internal</b> 44:16 <b>INTERNATI...</b> 1:10 <b>internet</b> 69:11 120:19 <b>interpret</b> 67:23 67:24 68:9 <b>interpretation</b> 68:5 69:15 70:14 71:3 132:5,7 137:11 137:11 <b>interpretive</b> 137:12 <b>interrogatories</b> 3:7 12:3 117:23 <b>interrupt</b> 93:11 <b>intervention</b> 76:10 <b>investigated</b> 73:15 <b>investigation</b> 75:5 109:10 <b>invite</b> 46:22 <b>involuntary</b> 89:10 90:4 <b>involved</b> 23:25 24:6,13 25:5 32:2 33:24 34:22 37:6 116:9,10 <b>involvement</b> 14:16 47:21 <b>involving</b> 24:2,6 24:20 86:22 <b>irreparable</b> 98:14,17 99:2 106:20 124:3 124:12,19 <b>irreversible</b> 98:14 99:2 124:3,13 <b>isolating</b> 62:17 62:17 <b>issuance</b> 107:7
---	---	--	---	--

107:24 108:22 109:6 110:1 112:21 <b>issue</b> 49:4,25 52:4,5 56:10 56:13 63:2 80:5,7 95:6,22 98:8 100:21 101:20 102:2 102:20 109:14 111:10 126:17 131:10 132:25 133:12 137:11 137:12 <b>issued</b> 99:10,14 109:19 124:21 <b>issues</b> 28:24 30:8 37:13 49:24,24 50:12 56:17 62:16 111:22,22,23 111:25 112:6 <b>issuing</b> 99:17 <b>Item</b> 129:9 <b>items</b> 131:25	30:11 34:6 <hr/> <b>K</b> <b>K-e-r-t</b> 25:24 <b>k:drive</b> 53:20,23 54:4,12,17 58:6 116:12,16 116:19,22 117:1,12 120:20 121:24 121:25 122:8,9 122:11,21 130:6,8 131:12 131:20,21,25 132:8,18 133:2 133:12,17,21 133:24 134:1,3 134:8,9,10,16 134:17,23,25 136:7,15,17,22 <b>keep</b> 77:5 <b>keeping</b> 53:7 <b>Kennedy</b> 2:12 8:12 <b>kept</b> 21:17 41:10 60:23 <b>Kert</b> 25:22 26:16 115:18 <b>kilobytes</b> 22:4 <b>Kimber</b> 3:10 42:18 44:2 <b>kind</b> 29:13 44:14 48:25 53:12 58:24 60:1,12 67:3 75:13 76:5 78:5 81:10,11 95:16 97:19 <b>kinds</b> 23:25 24:11 48:11 94:23 95:18 101:10 <b>knew</b> 20:1 74:16 125:3 <b>knocks</b> 23:5 <b>know</b> 5:25 7:3	9:21,22 11:6 15:1,5,5 16:4 17:13,16 21:23 22:4 23:2 26:8 27:1 29:14 32:1,6,13 33:3 33:12,17,24 34:10,21,25,25 35:15 36:3,7,7 36:10,11,20,24 37:5 38:3,19 38:19,21 39:6 39:9,14 41:13 43:9,13,16 44:7,18 45:14 50:2 51:11,22 52:22 54:2,7 54:23 55:11 56:11,22 57:1 57:17 58:8 65:9 67:1,7 68:2,4,8,15 69:9,13 71:4,4 72:23 73:18,22 73:23 74:21 75:3,18 77:9 78:4 80:7,23 81:2,5,6 84:25 85:21 88:13 89:4 90:8,19 91:4,19 94:18 102:9 103:8 104:6,12 105:14 108:3,6 110:5,6 112:12 118:11 119:11 119:12,18,25 122:1,14,20,21 123:20 124:9 126:11,16 127:6,10,20 129:6 130:7 131:19 132:2,3 132:11 134:24 135:4,13,14 136:1,6,19,19	137:1 <b>knowing</b> 129:17 <b>knowledge</b> 9:14 14:9 43:1 47:11 51:19 <b>known</b> 7:16 74:2 74:5,9 <b>knows</b> 9:15 134:1 <hr/> <b>L</b> <b>L</b> 1:8 138:6,19 <b>labeled</b> 58:6 97:23 <b>language</b> 30:19 32:19 33:5 59:8,16,17 60:24 103:7 104:1 106:19 106:21 109:11 123:24 124:1 124:13 <b>large</b> 5:3 139:6 <b>latest</b> 123:3 137:17 <b>law</b> 14:6 22:15 22:18,19,25 23:7,9 30:13 35:3 38:19 75:4 83:9 <b>lawsuit</b> 5:20 24:14 <b>lawyer</b> 6:23,25 110:9 <b>lawyers</b> 30:13 81:4 132:6 <b>lay</b> 83:16 84:4 <b>layman</b> 52:19 <b>lays</b> 97:11 <b>lead</b> 28:21 33:11 33:21 42:2 50:9,13 73:21 <b>leave</b> 13:12 128:19 <b>legal</b> 27:20 30:8 30:14 37:13,14	38:21 40:11,22 47:18,19 48:9 49:24 50:11 53:24 54:1,13 54:14 57:1 70:20 88:3 89:23 90:2,6 90:11,14,16,20 91:5 92:6,15 93:3,22 94:7 94:20,23 95:4 95:9 98:2,19 101:13,16,22 102:11,15 106:13 107:6 107:16,23 108:1,6,6,12 108:21,24 109:5,9,13,18 109:25 110:19 110:25 111:5 112:10,12,20 112:23 113:1,5 113:15 115:10 115:23,24 116:1,2,21 117:1 129:6,10 130:6 131:20 133:23 <b>legally</b> 98:13 <b>legally-operat...</b> 107:17 <b>legislation</b> 37:19 46:4,16 49:16 126:19 <b>legislative</b> 45:17 60:1 <b>lenient</b> 104:18 104:22 <b>lesbian</b> 7:20 35:6 81:19 <b>let's</b> 35:17 50:7 50:25 61:7 62:1 78:19 79:23 134:19 135:3
--	---	---	---	--

<p><b>letters</b> 7:20  <b>levy</b> 100:3  <b>LGBT</b> 7:20 25:5  111:23  <b>LGBTQ</b> 85:4  <b>liability</b> 66:12  <b>LIBERTY</b> 2:2  <b>licensed</b> 103:23  104:10,15  <b>licensing</b> 49:1  49:10 50:16  <b>licensure</b> 23:17  <b>limited</b> 20:12  21:12 54:1  80:6 118:2  120:7,9 131:23  <b>limits</b> 15:7,7,8  34:3  <b>line</b> 40:16 50:6  110:23 129:5  <b>lines</b> 116:7  <b>list</b> 9:2 77:3  133:13  <b>lists</b> 104:2  128:23  <b>literature</b> 52:17  53:10,13,15,16  54:21,25 55:4  55:6,12 56:6  56:11,12 57:9  60:4,7 75:8,10  81:5 83:20  85:12,17 89:21  90:24 91:12,17  91:21,22,24  93:7,8,12,14  93:22,24 94:1  94:2,8,9 95:5  95:10  <b>litigation</b> 12:22  16:8 21:2  23:20 24:8,9  24:25 25:1  <b>little</b> 62:22  64:23 65:13  66:22 77:5,8</p>	<p>82:12 88:19,20  108:25  <b>living</b> 79:1  <b>LLP</b> 2:7  <b>LMFT</b> 1:8,9  <b>local</b> 122:12  <b>located</b> 54:17  <b>location</b> 43:4  <b>long</b> 18:5 22:3  22:10 123:7  <b>look</b> 28:11 34:7  36:19 47:24  49:18 50:7,25  55:25 56:5  60:20 63:23  64:14 68:3  70:11,15 74:19  75:19 83:12  85:23 89:1  95:24 102:16  105:25 110:2  123:14  <b>looked</b> 30:10,11  30:12 33:4  48:1 58:23  59:10 68:12,13  68:14 74:18  <b>looking</b> 17:9  30:19 48:15  52:17 56:10  58:24 59:8  70:22 114:3  127:13  <b>looks</b> 110:10  126:4  <b>lot</b> 63:19,22  73:24 135:7,7  <b>lots</b> 33:2  <b>loud</b> 6:12  <b>luxury</b> 83:10  <b>Lynn</b> 139:5,21</p> <hr/> <p style="text-align: center;"><b>M</b></p> <hr/> <p><b>magistrate</b> 97:6  97:7,13,18  98:21 99:20,22</p>	<p>99:24 100:1,15  100:19,20,25  101:2,5,8,12  101:15,18,23  102:2,7,12  103:20 105:10  105:19 124:23  <b>magistrates</b>  97:13 101:1,7  102:17,22,24  103:1,12  <b>major</b> 81:14,16  <b>majority</b> 93:2  <b>making</b> 6:7  70:10 81:8  99:22 105:17  <b>male</b> 67:2,2  71:20,21 72:7  72:8 73:9,10  76:19,19 78:24  82:5  <b>man</b> 35:9  <b>manage</b> 76:12  <b>Manager</b> 1:15  <b>mandatory</b>  103:21  <b>Mandell</b> 27:23  28:4,5 43:23  <b>Maniscalco</b> 10:1  10:3,12,18  26:10 28:17  30:23 38:24  50:3 88:21  92:1,19  <b>March</b> 46:1  125:14  <b>mark</b> 11:15 36:6  42:7 47:4  122:23  <b>marked</b> 3:5,9,12  3:14,17,19,22  4:2,5,7 11:16  42:9,10 47:2,5  50:23 52:7  57:19 95:25  113:24 114:6</p>	<p>114:13 120:12  121:12 122:24  125:7 128:5,17  <b>Mary</b> 45:13,14  45:23  <b>master</b> 99:1  103:22 104:15  104:17  <b>masters</b> 104:9  104:10  <b>match</b> 84:14  <b>matter</b> 10:14  30:17 40:3,11  73:20 99:4  101:5,10 111:9  132:8  <b>matters</b> 10:19  15:13 24:5  <b>mayor</b> 97:12,14  103:15  <b>mean</b> 15:17 16:1  16:20 17:20  20:1 23:2 27:1  31:1 33:2 34:2  35:14 36:3  38:23 40:11  45:4 49:23  54:7 61:20  62:13 63:19  64:14 65:13  67:19,19,20  68:13 70:7  71:4,8 72:18  72:24 73:23  80:23 90:19  91:8 93:19  111:22 115:21  122:1,15,16  135:1  <b>meaning</b> 71:16  <b>means</b> 9:12 49:5  50:8 56:12  61:10 85:14  98:21  <b>meant</b> 70:21  71:11 89:1,3</p>	<p>125:4  <b>mechanism</b>  48:19  <b>medical</b> 53:9  58:4  <b>medication</b> 8:16  <b>meet</b> 16:24  18:20 19:17  20:7 38:6 77:4  <b>meeting</b> 18:8  29:8 30:2,4  35:18 36:25  37:1,8,11,19  39:15,19,21  40:1,17 41:6  43:3 46:1,18  105:20  <b>meetings</b> 17:7  17:17,20,21,24  18:16,17,18  20:6,11,15  37:1,6,25 38:2  39:16,24 40:7  40:25 41:11,14  41:18 42:5  46:2,15 95:15  <b>megabytes</b> 22:5  <b>member</b> 26:10  27:9 29:6,17  30:18 37:8  38:10,15,24  39:1,8,17,19  40:24 41:4,15  46:3,18 50:3  88:21 90:23  91:25 92:2,21  94:6 95:22  <b>members</b> 1:11  37:1,3,21,24  38:1,12,18  39:7 40:2,6,18  40:25 41:11,15  41:21 42:6  45:20 46:16  50:11 95:17,21  <b>memo</b> 4:8 20:25</p>
---	---	--	---	--

<p>21:7,10 51:15  <b>memos</b> 118:4                  135:4  <b>mens</b> 87:19  <b>mental</b> 25:11                  81:20 82:16,22                  84:1,10,21                  85:4,19 86:10                  104:10,15                  111:22,23  <b>mentioned</b>                  33:17 117:9  <b>meritless</b> 113:19  <b>meritorious</b>                  112:24  <b>merriam-web...</b>                  69:11  <b>message</b> 38:25                  44:20 45:3,12                  46:10 123:3,4                  123:13 125:11                  125:13  <b>messages</b> 39:7                  42:21  <b>met</b> 30:9 38:18                  108:14  <b>methods</b> 48:6                  92:4 93:1                  106:10  <b>Miami</b> 27:8                  58:25 89:2  <b>Michigan</b> 22:19  <b>Microsoft</b> 42:21  <b>Middle</b> 1:1                  24:15  <b>MIHET</b> 2:5                  132:13,16                  133:19 134:2,7                  134:17,22                  135:14,18                  136:3,6,10,14                  136:22 137:16  <b>mind</b> 27:14                  58:20 60:13,16                  76:14 86:6                  87:16 88:5,15</p>	<p><b>mine</b> 42:10  <b>minors</b> 112:4                  129:11  <b>minutes</b> 17:8                  18:6,10,11,24                  41:10 45:24                  129:23  <b>Miranda</b> 43:3                  45:19,20  <b>Miranda's</b> 43:4                  43:7  <b>misguided</b> 85:18  <b>missed</b> 137:13  <b>misspeak</b> 31:19  <b>misspoke</b> 42:13  <b>mobile</b> 110:13                  110:18,23  <b>model</b> 34:7,7                  59:8 90:22,23  <b>models</b> 93:14  <b>modified</b> 9:8  <b>moment</b> 65:22  <b>months</b> 96:16  <b>morning</b> 7:11                  129:4 137:18  <b>motion</b> 27:7,7                  27:12 28:17                  29:5 30:18,20                  31:8,17 88:21                  88:24 93:2                  94:7,7  <b>motions</b> 92:19  <b>move</b> 31:13 47:1                  70:17 94:22  <b>moved</b> 31:21                  122:8  <b>msg</b> 42:20  <b>Mueller</b> 3:13,15                  3:18,21,23 4:4                  4:8 16:19,23                  18:15,20 20:7                  20:13 26:3,11                  26:18 27:21                  28:13,21 29:25                  31:9 32:3,11                  35:24 43:7</p>	<p>47:7 50:9 51:1                  51:12 52:11,15                  52:25 57:16,22                  58:12 105:17                  105:22 106:2                  106:16 116:18                  117:2 123:2,5                  124:11,25                  125:14 128:21                  129:1,5 134:8  <b>Mueller's</b> 25:13  <b>multiple</b> 35:25                  35:25 49:23                  130:25  <b>municipal</b> 24:3                  115:7,17  <b>mutual</b> 19:24</p> <hr/> <p style="text-align: center;"><b>N</b></p> <hr/> <p><b>name</b> 5:20 8:10                  19:11 24:16                  25:23 115:13                  130:12  <b>name's</b> 120:25  <b>named</b> 35:9  <b>names</b> 13:7  <b>National</b> 35:6  <b>nature</b> 29:15                  33:3 44:22                  51:7 73:16                  98:11 101:17                  111:19,21                  124:3,18  <b>NCLR</b> 35:6  <b>necessarily</b> 34:3                  41:25 74:8  <b>necessary</b> 56:19                  57:4,6  <b>need</b> 7:3 12:12                  27:1 59:19                  87:22,25                  108:16 113:1  <b>needed</b> 30:15                  39:9 122:17                  128:19  <b>needs</b> 10:13</p>	<p>135:10  <b>neighbor</b> 74:21  <b>Neighborhood</b>                  1:16  <b>neither</b> 84:7                  86:7,11  <b>network</b> 53:24  <b>neutral</b> 76:10,13  <b>never</b> 34:18 46:9                  112:17  <b>new</b> 1:10 11:14                  30:12 59:7  <b>news</b> 56:8  <b>nine</b> 119:4  <b>ninety</b> 18:11  <b>Ninth</b> 67:25                  68:1,11,15,16                  68:20 69:4,10                  70:12 71:1  <b>non</b> 90:25 95:5  <b>non-aversive</b>                  89:5  <b>nonbinary</b>                  82:15,16  <b>nonconforming</b>                  81:20 87:10  <b>nonverbal</b> 6:12  <b>normal</b> 37:18                  40:3 122:10,14                  130:14  <b>normally</b> 98:15                  124:14  <b>North</b> 1:23 5:3  <b>Notary</b> 5:2                  138:20 139:5                  139:21  <b>Note</b> 80:2  <b>notice</b> 5:5 8:25                  9:2 97:23 98:9                  98:10,20 99:5                  99:7,10,14,18                  100:17 107:7                  107:18,24                  109:6,14,19                  110:1,21                  112:21 124:21</p>	<p><b>notify</b> 98:23  <b>notifying</b> 98:22  <b>November</b>                  138:11 139:14  <b>nuance</b> 82:12  <b>nuances</b> 94:16                  95:23  <b>number</b> 39:16                  52:11 56:13                  57:23 83:22  <b>numbered</b> 96:22  <b>numerous</b> 95:10                  97:13</p> <hr/> <p style="text-align: center;"><b>O</b></p> <hr/> <p><b>o'clock</b> 1:25                  137:24  <b>OATH</b> 138:1  <b>object</b> 6:23                  10:22 62:8                  71:22 79:9                  92:8  <b>objected</b> 62:14  <b>objection</b> 10:24                  63:15,16,17                  65:17 72:9                  76:22 80:2                  86:20,23  <b>objections</b> 3:6                  11:19  <b>obligated</b> 98:18                  124:15  <b>obligatory</b>                  124:24  <b>obliges</b> 62:5,5                  63:11  <b>obtain</b> 54:25                  106:6 108:16  <b>obtained</b> 74:15                  88:3  <b>obvious</b> 40:17  <b>obviously</b> 16:18                  17:20 35:15                  53:7 78:16                  87:22 102:3                  111:24 122:16</p>
--	--	--	---	--

122:18 <b>occupations</b> 104:2 <b>occur</b> 40:25 100:20 <b>occurred</b> 20:21 37:6 61:19 73:13 83:6 87:8,15 88:7 98:7 99:3,17 100:5 113:9 131:11 <b>October</b> 1:23 <b>offer</b> 58:12 59:23 <b>office</b> 21:10 25:14 32:7 37:2 38:11,16 40:1 43:5,8 44:3,12,15,19 46:4,15 49:17 65:5 115:22 116:5,13,15 131:18 133:6,7 133:18 134:15 137:4,7 <b>officer</b> 75:4 121:1 <b>official</b> 1:15 12:7 22:8 70:14,18 100:3 108:5 115:8 138:10 <b>official's</b> 112:23 <b>officials</b> 98:1 113:8,13 <b>okay</b> 6:5,8,13,17 6:20,25 7:5 9:11 11:5 12:10,15 13:2 16:22 17:15,21 18:3,14,25 19:4,8 20:6,10 20:24 21:15,20 21:24 22:23 26:18 27:5	28:6,16 29:3 32:14,16 33:24 34:15 35:17,25 38:5 39:22 40:13 41:8,23 46:12,19 47:1 49:6 54:11 55:4,18 59:3 67:12 74:7 79:25 86:6 89:4,22 97:1,4 97:24 103:6,10 103:16 106:22 110:16 111:3 114:21 115:19 117:24 125:23 128:4 129:2 130:21 131:4 132:16 133:10 135:5,6 136:10 <b>old</b> 66:23 78:21 <b>once</b> 17:2 19:18 60:10 66:5 75:15 80:19 97:25 99:10 116:1,1 124:21 <b>one-up</b> 93:16 <b>ones</b> 58:22 71:6 81:11 <b>opened</b> 120:23 <b>operating</b> 48:16 108:7 112:18 <b>operatively</b> 98:15 <b>opinion</b> 103:9 <b>opportunity</b> 38:15 39:8 117:14,24 <b>opposed</b> 6:12 19:9 53:22 74:13 105:11 <b>opposite</b> 77:22 <b>opposition</b> 83:24 <b>order</b> 9:2,8 13:6 13:7,10 15:7	27:2 29:5 50:14 71:1 73:25 92:22,24 100:19,21 108:16 110:22 110:25 118:2 118:10,18,22 119:8,15 120:6 120:9,22 131:23 132:5 133:4 <b>ordered</b> 21:13 <b>orders</b> 13:18 110:18 <b>ordinance</b> 4:6 7:15,16,17 8:7 12:20 14:4 16:3 25:4,8 26:2,10,19,21 26:24 27:6,15 28:17,24 29:21 31:16,22,23 32:17 33:8,9 33:10,13,19,22 33:25 34:7,22 34:24 35:13,16 35:16,19,19,22 36:5,14 37:3 38:17 39:10 40:9,15 42:3 47:15,22 48:1 48:2 50:4,10 51:9 53:1,15 53:17 55:5,14 55:20 56:2,6 56:15,17,18,21 57:3 59:20 60:9,11,19 61:4,8,19 62:7 63:14 64:6,10 64:12 65:11,24 66:3,7,12,17 66:25 67:5,6 67:21,22 68:6 68:10,22,25 69:5,15,16	70:6,23,25 71:3,17 72:15 72:19 73:1 75:11 76:8,11 76:21 77:11 78:14 79:7 80:14,18,24 81:1,15 82:8 82:14 83:3,5,6 84:17 85:6,14 86:18 87:3,8 87:21,24 88:11 89:16,24 90:3 90:12,15,17 91:6 92:25 93:1,7 95:15 96:19 97:17,20 100:24 101:4 101:22 102:13 104:14,23 105:10,14,15 109:19,22 113:10 116:9 117:16 123:9 123:15 126:1,2 127:14 128:9 129:10,12 <b>ordinances</b> 30:10 57:12 58:23 59:5,10 59:13 60:22,24 124:2 <b>organiz</b> 55:16 <b>organization</b> 20:5 35:5 55:16,19 <b>organizational</b> 49:22 <b>organizations</b> 25:5 51:10 53:21 54:20 55:10,13,21 58:5 85:3 <b>organizer</b> 43:6 <b>orientation</b> 7:24 52:20 53:10	61:12,17,25 62:3 63:10,13 65:2,8,21 66:6 66:10,14,16 71:7 72:17,21 80:25 84:3 89:6 <b>originated</b> 26:2 <b>Orlando</b> 2:3 <b>Otto</b> 12:25 16:9 <b>outgrow</b> 75:14 <b>Outlook</b> 42:21 46:21 <b>OUTREACH</b> 1:10 <b>outset</b> 65:22 <b>outside</b> 33:12,22 34:1,2,3 118:5 118:7 <b>overall</b> 48:5 <b>overly</b> 62:9 71:23 <hr/> <b>P</b> <hr/> <b>p.m</b> 1:25 137:24 <b>page</b> 3:2,4 9:2 11:23,24,25 42:16 43:2 44:9 45:7 61:8 81:14,15 96:24 107:3 123:5 <b>pages</b> 78:4 96:22 119:4 <b>pages'</b> 21:25 <b>Palm</b> 34:9,10 35:9 47:7,25 58:25 138:4 139:3 <b>paper</b> 21:17 127:4 130:21 <b>papers</b> 33:4,6 55:20 56:1 <b>paragraph</b> 53:19 54:22 129:8 <b>paralegal</b> 20:25
--	--	--	---	---

<p>32:5 44:3 130:23 132:12 133:5 135:5 137:5 <b>paralegals</b> 44:25 <b>parallel</b> 12:23 <b>parameters</b> 130:9 <b>paraphrasing</b> 67:4 <b>park's</b> 110:13 <b>parking</b> 103:5 <b>parliamentary</b> 92:22 <b>parse</b> 70:16 94:8 136:11 <b>part</b> 21:2 24:2 30:2 31:18 37:18,23 40:21 48:5 49:19 53:6 56:13,24 57:2 81:9 83:5 83:7 84:4 134:9 <b>partial</b> 94:1 <b>participation</b> 30:6 <b>particular</b> 13:18 13:19 15:20,23 30:16 32:8 43:20 44:4 46:9 52:2 57:9 61:24 96:24 100:16,24,25 101:11,19 102:2,12 111:1 127:13 <b>party</b> 132:3 <b>pass</b> 23:13 38:25 57:12 <b>passage</b> 12:20 <b>passed</b> 30:10 59:5 94:7 123:9 129:12 <b>passing</b> 39:7 105:15 127:4</p>	<p><b>patient</b> 62:18 65:25 66:3 74:12 80:10 83:14 84:2 87:12 <b>patient's</b> 66:1 <b>patient/provid...</b> 112:5 <b>patients</b> 1:8,9 83:13 <b>Patrick</b> 115:15 <b>pay</b> 100:11,18 103:9 <b>PC</b> 122:12 <b>pending</b> 5:8 16:9 46:4,16 <b>people</b> 20:11,12 32:1 48:16 84:19 126:14 130:25 133:20 134:5 135:2,7 135:22 <b>performed</b> 61:11,16 72:16 73:2 <b>period</b> 26:9 78:23 86:9 98:16,19 124:24 <b>periods</b> 124:20 <b>permit</b> 48:17,20 <b>permits</b> 48:16 <b>permitting</b> 49:1 49:10,14 50:7 50:16 <b>person</b> 26:24 27:11 34:17 43:20 44:20 64:19,21 100:11,12 115:11 121:7 <b>person's</b> 64:21 <b>personal</b> 9:14 133:14,14 <b>personally</b> 14:13,18,22</p>	<p>34:19 41:18 55:25 138:7 <b>personnel</b> 114:25 116:14 <b>persons</b> 33:12 34:1 <b>perspective</b> 50:3 <b>pertinent</b> 30:21 51:25 <b>phone</b> 19:18 46:20 126:13 <b>phonetic</b> 20:17 130:23 <b>phrase</b> 63:16 <b>phrased</b> 38:4 <b>PICKUP</b> 1:9 <b>piece</b> 37:19 57:9 <b>pieces</b> 95:10 130:20 <b>place</b> 1:23 109:23 111:5 <b>placed</b> 58:5 <b>Plaintiff</b> 3:6 <b>Plaintiffs</b> 1:12 1:20 2:4 5:7,20 118:1 <b>Plaintiffs'</b> 3:5,9 3:12,14,17,19 3:22 4:2,5,7 11:15,16,19 42:9 47:2 50:23 52:7 57:19 95:25 113:24 114:3 114:13 117:19 117:22 120:12 122:24 125:7 128:5,17 <b>plan</b> 104:13 112:16 <b>plans</b> 115:3 <b>please</b> 5:10 6:15 8:11 61:5 65:19 72:14 86:23 <b>PO</b> 2:2,8</p>	<p><b>point</b> 11:22 13:5 13:13,13 15:20 27:8 28:12 35:12,15 37:10 37:12,20 66:12 68:14 69:19 81:10 121:4 122:19 <b>pointed</b> 62:14 <b>pointing</b> 95:23 <b>points</b> 62:15 129:19 <b>policy</b> 46:23 58:3 107:9,25 108:1,4 112:16 116:4,8 <b>portion</b> 80:1 126:7 127:23 <b>portions</b> 43:10 60:9 <b>pose</b> 125:17 <b>posed</b> 10:17 <b>position</b> 22:7,10 25:13,15 26:3 28:13 31:5 56:10 63:11 64:3 83:14 84:8 87:5,7,14 93:15 108:4 115:16 132:17 133:16 134:5 134:13,18 136:14 <b>possession</b> 134:11 <b>possibility</b> 94:18 106:5 <b>possible</b> 50:7 107:5,22 108:23 112:22 132:22 137:2 <b>possibly</b> 39:15 <b>posts</b> 104:5 <b>potential</b> 33:13 66:5 88:16 112:1 115:8</p>	<p><b>potentially</b> 45:3 <b>Poverty</b> 35:3 <b>PowerPoint</b> 96:3,9,12 107:20 114:23 117:9 120:12 121:11,16,23 121:24 122:3 135:18 136:7 <b>practice</b> 8:6 11:5 37:23 38:9 39:4 40:3 46:14 53:22 61:10 72:16,20 91:15 122:10 122:14 <b>practitioners</b> 81:17 <b>precisely</b> 74:1 <b>precision</b> 69:22 <b>predetermined</b> 65:4 <b>predicate</b> 33:7 56:20 57:3 60:8 81:22 83:17,19 <b>predicated</b> 77:7 85:18 <b>prefer</b> 130:16 <b>preferential</b> 104:2 <b>prefers</b> 19:5 <b>preparation</b> 15:12,20 16:11 69:20 <b>prepare</b> 12:15 16:13 19:22,23 20:8 54:10 89:23 92:3,23 92:24 94:17,21 94:23 98:24 114:5 124:4 <b>prepared</b> 29:18 31:25 35:13,22 36:1 92:6 94:20 95:4</p>
--	---	---	---	--

96:10 <b>preparing</b> 30:6 32:2 <b>prepubertal</b> 66:23 75:13 <b>prescribed</b> 97:9 <b>present</b> 17:18,19 20:11 41:16 62:23 63:22 64:2 93:1,13 94:8 105:18 106:7 120:24 129:10 <b>presentation</b> 31:2 94:11 96:3,9,11,18 97:3 107:19 110:3,13 111:8 114:2,9,10,12 114:15,15,19 114:22 115:10 117:9,11 120:13,17,24 121:2,11,17,23 122:17 129:19 135:18 <b>presented</b> 29:25 35:20 50:20,22 57:15,18 94:10 105:21 106:16 126:3,6,19,25 <b>presenting</b> 28:22 42:3 50:10 52:24 64:24 80:6 81:12 <b>presents</b> 62:1 63:8 78:7,25 80:10 83:18 91:16 <b>preserved</b> 21:1 <b>presume</b> 122:6 <b>pretty</b> 33:9 73:1 80:24 <b>preventing</b> 93:21 94:3	<b>preview</b> 126:19 <b>previous</b> 49:4 79:15 <b>previously</b> 113:23 <b>principal</b> 26:24 <b>printed</b> 110:6,6 110:8 <b>prior</b> 5:25 25:4 28:5 63:17 69:17 80:21 82:1 88:9 100:1 107:6,16 107:23 108:22 109:5,25 110:19 112:20 124:17 125:19 126:8 <b>privilege</b> 37:16 112:5 <b>privileged</b> 41:7 <b>probable</b> 86:3 <b>probably</b> 18:17 77:8 132:3 137:10 <b>problem</b> 6:16 <b>procedure</b> 44:16 44:18 92:22 112:18 <b>procedures</b> 97:11 108:8 <b>proceeding</b> 104:17,19 <b>Proceedings</b> 137:24 <b>process</b> 27:5 36:21,23 76:2 92:10 97:6,7,8 97:15,19,23,25 98:21 100:2,7 100:8,14 102:3 103:17 105:10 105:11,22,23 110:23 118:8 124:7,7 136:2 137:14	<b>processes</b> 106:7 <b>produce</b> 93:7 132:24 134:21 <b>produced</b> 14:11 14:14,19,23,24 14:25 15:2,5,6 21:1 42:15 51:2 96:1 113:24 118:14 118:23 119:3,5 119:6,11,13,15 119:19,23 120:9,11 123:1 125:10 128:7 129:3 130:20 131:13,22 132:1,10,19,20 132:23 133:3 133:15 135:12 135:20,24 136:18,22,25 137:9 <b>producing</b> 118:8 <b>production</b> 3:8 14:17 20:20 42:15 47:5 51:3 52:11 57:23 118:6 119:20 120:1 123:1 125:10 128:8 129:4 131:10,14 <b>professional</b> 23:17 49:21 52:18 53:13,21 54:20,21 55:7 55:10,12,13,16 58:4 81:14,16 <b>prohibit</b> 66:25 71:18 90:3 <b>prohibited</b> 61:7 <b>prohibition</b> 59:17 <b>prohibits</b> 38:20 85:7 <b>pronounces</b>	19:7 34:13,15 <b>pronunciation</b> 19:11 <b>proper</b> 31:23 38:25 52:19 53:11 100:13 <b>properly</b> 91:18 <b>property</b> 111:1 <b>proposal</b> 26:9 <b>proposed</b> 123:8 <b>prosecutable</b> 106:5 <b>prosecute</b> 115:25 124:23 <b>prosecuted</b> 81:9 97:18 <b>prosecuting</b> 109:8 <b>prosecution</b> 24:4 <b>prosecutor</b> 24:4 115:17 <b>prosecutorial</b> 75:1,4 98:8 99:11 116:3 <b>prosecutors</b> 115:7 <b>provide</b> 21:9 37:13 51:23 82:20 84:12 86:18 87:22 126:18,22 131:2 <b>provided</b> 21:14 30:22 31:9 33:18 38:8 40:20 51:15 69:5 94:13 103:4 105:1 113:17 118:18 120:7 127:2,3 133:13 <b>provider</b> 61:23 62:1,2,6,19,20 62:24 63:9,11 64:4,9 65:4,6	75:24,25 76:4 76:5,9,17 104:15 <b>provider's</b> 61:20 61:22 63:4,6 63:12 65:6 76:16 <b>providers</b> 49:1 49:11 104:11 <b>provides</b> 64:18 64:20 76:5 80:12 <b>providing</b> 49:23 64:25 65:1 66:4,13 72:2 76:9 82:25 87:1 88:5 94:3 <b>provisions</b> 36:22 68:23 69:3 123:25 <b>psychiatric</b> 83:23,24 <b>Psychological</b> 55:22 93:16 94:12 <b>public</b> 5:2 13:11 29:7 30:2,17 31:3,9 39:23 39:24 40:17,20 44:21,23,24 50:21 94:16 95:15 127:1 138:20 139:5 139:21 <b>publicly</b> 46:21 <b>published</b> 83:23 <b>pull</b> 68:3 120:18 <b>pulled</b> 120:23 <b>purple</b> 77:10 <b>purports</b> 62:10 <b>purpose</b> 5:6 48:4 <b>purposes</b> 33:9 60:9 68:21 74:19 <b>pursuant</b> 5:5
---	---	--	---	--

8:25 44:16 <b>pursue</b> 75:2 99:12 113:20 <b>pursued</b> 73:14 <b>purview</b> 131:25 <b>put</b> 44:20 54:13 55:1 57:3 60:6 98:9 104:2,3 119:8	<b>questions</b> 5:23 7:7 9:15,20 20:3 38:2,7 39:8 68:5 69:14 71:2 98:3 105:21 119:16 121:5 137:21 <b>quite</b> 90:24 108:23 118:19 <b>quote</b> 60:5 <b>quoted</b> 60:5 <b>quotes</b> 52:19 <b>quoting</b> 33:5	<b>reads</b> 45:23 52:17 53:19 61:9 96:4,24 97:5 107:4 114:4 128:8 129:11 <b>really</b> 15:25 16:4 40:12 49:7 65:14 67:5 74:1 91:17 93:8 116:24 119:5 129:18,21 <b>reason</b> 51:20,22 67:7 71:6,9 90:11 91:4 92:5 93:3 112:1 135:15 137:10 <b>reasonable</b> 98:4 98:5,6,24 99:16 <b>Rebecca</b> 25:22 115:18 <b>recall</b> 8:17,20 17:1,4 27:22 28:10 32:21 36:17 37:9 39:18,25 43:22 50:19 56:8 58:14,18 68:15 70:3 75:17 88:24 89:11 95:20,21 96:15 106:17,24 111:7 123:18 126:10,13 127:5 <b>recalled</b> 111:7 <b>recap</b> 87:14 <b>receive</b> 21:2 37:24 38:1 <b>received</b> 20:25 23:11 25:10 73:5,11 <b>receiving</b> 123:18	<b>Recess</b> 61:2 88:17 130:1 <b>recital</b> 83:1 <b>recitals</b> 56:18 84:19 85:3 87:18 88:11 <b>recite</b> 68:16 69:21,23,25 77:1 <b>recited</b> 56:2,6 75:11 <b>recites</b> 55:20 <b>recognize</b> 11:20 43:12 47:9 51:3 52:12 57:24 128:9 <b>recognized</b> 81:16 <b>recollection</b> 15:13,22 16:2 27:17 28:11 60:18 <b>recommend</b> 19:13 <b>recommended</b> 135:23 <b>record</b> 8:11 9:21 10:20,24 11:7 19:6 21:4 24:12 30:2,18 31:3,19,20 36:19 39:24 41:10 42:3 44:24 45:8 107:1 131:17 <b>records</b> 44:21 44:23 <b>recruit</b> 104:14 <b>rectify</b> 137:13 <b>redundant</b> 7:10 <b>reenforce</b> 56:20 <b>refer</b> 14:10 33:15 48:16 50:21 53:11 63:16 64:14 71:9,25 106:24	110:12 112:22 121:6 <b>referenced</b> 27:8 <b>references</b> 56:14 82:14 90:24 <b>referred</b> 52:21 107:6,23 108:24 109:5 109:18,25 110:19 120:14 121:8,9 <b>referring</b> 7:12 7:15 8:6 21:3 24:24,24 27:14 33:4 53:14 71:12 112:20 123:20 124:10 125:25 126:2,5 127:7,11 129:20 135:9 <b>refers</b> 42:19 58:3 <b>refine</b> 135:3 <b>reflect</b> 107:24 108:1 <b>reflected</b> 107:20 112:19 <b>refresh</b> 15:13 16:2 27:17 28:11 75:20 <b>refreshed</b> 15:22 <b>regard</b> 15:17 <b>regarding</b> 9:5 15:13 30:15 34:24 37:3 38:16 61:24 69:15 75:12 89:14 92:4 96:19 115:1 117:15 129:11 130:6 <b>regardless</b> 121:21 <b>regime</b> 83:25 <b>regular</b> 104:18 <b>Regulation</b> 47:8
<b>Q</b>				
<b>qualifications</b> 103:22 <b>qualified</b> 102:18 <b>quasi-judicial</b> 97:8,15 <b>question</b> 6:15,19 6:24 7:4 9:13 9:16 10:6,16 10:16,23 13:5 14:15 16:1 18:15 33:15,20 35:2 36:4 38:4 40:12 41:9 46:6 49:4 51:12 52:24 53:3 55:15 62:9,15,16 63:17,20 64:8 65:14 70:4,13 71:10 72:14 73:23,25 77:24 85:10 91:11 92:8 93:20 94:5,25 95:2,7 95:8 96:25 97:5 99:9 102:4 118:19 118:20 119:24 119:24 125:5 125:17 127:17 127:21 130:2,7 130:22 131:3 134:22 136:24 <b>questioning</b> 9:25 81:20	<b>R</b>			
	<b>R</b> 139:1 <b>R-i-c-e</b> 115:14 <b>Rachele</b> 5:2 138:6,19 139:5 139:21 <b>Raise</b> 5:9 <b>raising</b> 95:22 <b>Rand</b> 35:9 <b>random</b> 113:16 <b>ranges</b> 118:11 <b>rea</b> 87:19 <b>reach</b> 119:20 <b>reached</b> 28:23 75:15 <b>read</b> 43:9,10,10 55:12,25 56:9 58:10 61:13 64:6 72:18 79:23 80:1 81:25 87:19 123:11 127:22 127:23 137:23 <b>reading</b> 31:21 31:24 32:17 35:18 36:13,13 36:24 37:1 56:8 82:25 123:9,10,14 126:6 <b>readopt</b> 79:5			

48:1 <b>reiterated</b> 60:8 <b>reject</b> 85:3 <b>relate</b> 81:25 <b>related</b> 108:11 120:16 124:12 <b>relating</b> 13:19 56:1 <b>relation</b> 127:9 <b>relationship</b> 102:7 <b>relative</b> 139:11 <b>relevant</b> 51:25 56:11,16 61:18 74:10 81:12 83:1,5 85:13 85:20,25 88:1 88:4,6,8,15 119:6,14 <b>relied</b> 91:13,24 93:6 <b>relieve</b> 63:7 <b>religious</b> 51:9,10 <b>rely</b> 46:21 55:1 70:9 91:19 93:17,24,25 <b>relying</b> 91:12 <b>remember</b> 19:20,21 27:25 28:9 34:8 41:20 59:1 96:14 125:20 125:21 127:16 127:20 <b>reparation</b> 52:21 <b>reparative</b> 61:9 64:17 83:25 <b>repeat</b> 10:6 72:24 77:16 100:9 127:21 <b>repeated</b> 10:15 <b>rephrase</b> 67:9 <b>report</b> 28:14,22 28:25 29:3,7,8 29:9,13,19,23	29:25 30:7,16 30:22 31:4,8,9 50:17,17 88:21 89:14 92:4,7 92:20,24,25 93:23 94:4,14 94:16,18,21 95:4,6 139:8 <b>reported</b> 95:11 <b>reporter</b> 5:9 80:1 127:23 <b>reports</b> 94:24 95:12 <b>representative</b> 20:2,5 124:5 <b>represented</b> 102:1 <b>represents</b> 117:11 <b>request</b> 29:16 30:21 42:19 44:10,21 45:1 49:8 66:19 89:14 93:5 126:18 133:4 <b>requested</b> 21:1 30:23 31:4,6 39:19,25 45:5 49:19 80:1 83:2 92:1,1,7 103:13 127:23 127:25 <b>requesting</b> 46:20 118:6 <b>requests</b> 3:7,7 11:20 117:20 117:22,25 118:1 <b>require</b> 48:17 112:22 <b>required</b> 43:6 98:16 103:25 <b>requirement</b> 87:20 <b>requirements</b> 38:22 101:14	104:6 <b>requires</b> 132:5 <b>research</b> 12:21 16:8 30:8 32:18 33:6,11 33:15,19,21 42:4 47:23,23 49:17 50:6 51:8 <b>researchers</b> 81:17 <b>researching</b> 28:24 49:15 56:13 <b>reset</b> 78:6 <b>resolution</b> 55:4 103:19 <b>resolutions</b> 53:20 54:19 55:7,13,21 56:1 <b>resort</b> 70:25 98:19 <b>resources</b> 43:7 <b>respond</b> 58:12 74:4 <b>responded</b> 117:19 <b>responds</b> 27:12 <b>response</b> 9:15 21:10 74:23 117:21 <b>responses</b> 3:6 6:12 11:19 24:1 135:6 <b>responsibilities</b> 49:20 <b>responsibility</b> 49:22 <b>responsible</b> 26:25 50:10 <b>responsive</b> 20:22 118:13 118:18 131:12 131:21 132:9 132:18 133:4	136:17 <b>restricted</b> 42:18 44:10,13,17,20 45:3 <b>restrictions</b> 88:3 <b>result</b> 38:7 84:20 86:9 113:11,11 133:3 135:12 <b>retains</b> 99:11 <b>return</b> 79:5 86:14 <b>revert</b> 76:3 <b>review</b> 12:15,18 14:25 16:7,7,8 69:16 75:8,10 93:23 107:6,23 108:24 109:5 109:25 110:19 112:20 113:1 117:14,24,25 132:21 <b>reviewed</b> 12:19 12:21,22 13:9 14:3,13,19,22 15:11 16:1,11 54:16 59:18 69:20 118:2,4 119:20,22 <b>reviewing</b> 15:21 44:21 93:22 118:9,10 <b>revocation</b> 48:19 <b>rezoning</b> 24:2 <b>Rgannam@lc...</b> 2:6 <b>Rice</b> 115:13,15 <b>Rice's</b> 115:16 <b>right</b> 5:9,18 7:9 8:10,23 16:17 25:1,1 28:2 32:25 35:12,17 36:23 41:17 59:1 64:13 67:13 68:7,8	70:2 74:6 81:12 82:11 95:24 107:2 111:23 114:17 119:22 121:10 122:7 127:18 128:15 129:22 129:25 132:7 132:25 136:5 137:3 <b>rights</b> 24:7,20 24:22,23 35:7 <b>risk</b> 83:18 91:16 <b>Riverview</b> 22:20 <b>Rob</b> 16:20 21:3 21:4 130:2,17 133:9 <b>Rob's</b> 20:25 <b>Robert</b> 1:8 2:10 3:7 <b>robust</b> 58:7,13 58:15 59:20,23 <b>Roger</b> 2:6 5:20 92:11 <b>role</b> 28:21 32:16 33:18 67:2 71:21 72:8 73:10 <b>roles</b> 76:20 <b>roll</b> 104:10 <b>room</b> 89:4,8 <b>roster</b> 102:16 104:10 <b>rough</b> 17:12 37:7 <b>roughly</b> 96:16 <b>Ruggiero</b> 18:25 <b>Ruggiero</b> 1:15 16:19,23 18:25 19:1,2,3,7,8,9 19:17 20:7,13 96:2,3 109:12 135:25 <b>Ruggiero's</b> 114:1 <b>rule</b> 6:23
--	--	--	---	--

<p><b>rules</b> 5:24 49:21 88:13,14 92:22 102:9 104:17 104:21,24 105:6 <b>run</b> 105:9 <b>Rwilliams@b...</b> 2:10</p> <hr/> <p style="text-align: center;"><b>S</b></p> <p><b>S-O-C-E</b> 7:23 <b>safe</b> 107:12 <b>Sal</b> 1:15 16:19 27:24 28:7 43:23 96:2 <b>Sal's</b> 19:11 <b>Salvatore</b> 117:6 <b>same-sex</b> 62:4 <b>satisfied</b> 30:25 31:6 <b>satisfy</b> 30:23 <b>save</b> 63:18 122:10,11 <b>saved</b> 120:15 121:14,15 122:6,7,8,19 122:20,21 <b>saving</b> 53:20 <b>saying</b> 17:14 54:24 72:1 82:11 85:17 91:22 92:16 93:23 105:14 134:12 136:6 <b>says</b> 12:2 42:18 43:3 44:9 45:1 47:5 61:16 64:15,17 68:16 72:15 81:13,16 83:21,23 107:4 108:23 110:14 110:17 123:5,7 123:13,21 126:7 129:4,5 129:8 <b>scenario</b> 62:24</p>	<p>66:22 86:16 <b>schedule</b> 98:23 <b>scheduled</b> 123:10 <b>scheme</b> 49:1,11 49:14 <b>school</b> 22:15,17 22:18,19,25 23:1,5,7 83:9 <b>scope</b> 118:2 120:7,9 131:24 <b>scrivener's</b> 35:23 <b>scrutiny</b> 56:22 <b>se</b> 84:2 <b>seal</b> 138:10 <b>search</b> 13:19 15:7 20:21 21:13 118:3,11 118:13,22 119:7 120:2 130:9,11,20 131:12,21 132:9,18 133:13 134:25 134:25 135:1 <b>searched</b> 130:8 134:3,6,10,23 136:25 <b>second</b> 11:22 36:13,25 43:2 53:19 114:6 119:24 123:10 <b>secondary</b> 42:4 <b>secondly</b> 86:2 <b>see</b> 33:14 64:6 65:15 75:12 84:21 105:25 110:17 121:1 123:25 125:15 129:23 <b>seeing</b> 125:21 <b>seeking</b> 27:10 65:2 <b>seen</b> 42:25 44:10 44:13 46:9</p>	<p>96:5 <b>sees</b> 75:24 <b>selected</b> 115:6 119:7 <b>send</b> 46:22 100:17 116:5 <b>sender</b> 45:2 <b>sending</b> 123:8 125:20,22 <b>Senior</b> 26:1,4,11 27:21 <b>sense</b> 9:23 31:3 57:1 85:20 <b>sent</b> 20:25 52:14 118:5 121:7 135:4 <b>separate</b> 100:8 <b>series</b> 40:24 <b>serious</b> 83:18 <b>serve</b> 103:14,22 <b>sessions</b> 114:25 <b>set</b> 3:7 46:3,17 58:7 59:20 60:3 85:5 97:11 100:16 103:21 120:13 121:8,22 <b>sets</b> 106:5 <b>setting</b> 46:15 <b>seven</b> 41:22,23 42:19 <b>sex</b> 78:10 79:7 84:14 <b>sexual</b> 7:23 52:20 53:10 61:12,17,25 62:3 63:10,13 65:2,8,21 66:6 66:10,13,16 71:7 72:17 76:10 80:25 89:6 <b>shared</b> 40:17,23 51:17,20 53:24 116:16,16,23 <b>sheet</b> 11:9</p>	<p><b>short</b> 137:2,4 <b>shortcoming</b> 81:21 84:11 85:5 86:11 <b>shortcomings</b> 82:18 <b>shorter</b> 18:19 <b>shot</b> 22:3 62:12 79:10 <b>show</b> 11:14 42:7 47:4 78:3 87:23 113:23 122:22 129:2 <b>showed</b> 123:17 <b>shows</b> 42:16 45:7 <b>side</b> 126:17 <b>sign</b> 11:12 <b>signature</b> 12:3 <b>signed</b> 57:17 117:23 <b>significant</b> 91:16 113:10 <b>similar</b> 59:15 60:20 75:21 110:20 <b>simple</b> 127:3 <b>simply</b> 63:4 76:16 77:14 82:22 86:6 100:3 121:16 121:23 <b>Simpson</b> 1:19 3:2,18,20 4:3 5:1,12,18 8:12 8:15 10:17,19 10:22,24 13:5 52:10 57:22 61:4 62:12 85:10 96:5 123:3,6 125:12 125:13 129:9 131:9 135:25 138:7 <b>sir</b> 5:10 <b>sit</b> 10:4 12:10</p>	<p>15:1 28:8 46:12 68:8 69:23 70:2 91:4 127:6,12 131:19 <b>site</b> 69:12 <b>sitting</b> 121:17 <b>situation</b> 74:11 85:23,25 99:13 110:25 111:12 <b>sixteen</b> 78:20 <b>sixteen-year-old</b> 78:22 <b>skip</b> 81:18 <b>slide</b> 107:3,4 108:22 110:12 110:14 112:19 <b>slides</b> 96:19 114:2 <b>slightly</b> 124:1 <b>SOCE</b> 7:23 8:6 52:21 <b>social</b> 64:21 65:1 <b>SOLI</b> 1:10 <b>somebody</b> 133:16 <b>somewhat</b> 7:10 24:13 <b>soon</b> 61:1 126:24 <b>sorry</b> 9:16 15:25 42:8 55:11 77:16 93:11 125:12 127:21 <b>sort</b> 11:5 17:9 39:6 44:20 49:3 58:24 108:18 126:18 <b>sorts</b> 102:6 <b>sounded</b> 62:20 <b>sounds</b> 19:12 128:24 <b>source</b> 73:16,18 <b>south</b> 34:6 <b>Southern</b> 12:24 16:10 35:3</p>
---	---	---	---	--

<p><b>speak</b> 6:8 16:13 19:25 20:4 54:9 67:3 116:24 130:15 133:8 <b>speaking</b> 9:14 13:17 31:5 33:17 51:23 60:23 90:10 101:16 102:15 124:4 <b>special</b> 97:6,7,12 97:13,18 98:21 99:20,22,24 100:1,25,25 101:1,4,11,23 102:7,12,16,24 103:1,12,22 104:9,10,15,17 105:10,19 <b>specific</b> 11:2 15:17 26:8 28:10 30:14,19 31:19 60:16 70:16 75:19 76:24,25 77:4 77:7,9 78:17 93:12 95:22,22 96:15 101:14 102:2,21,21 125:5,6 <b>specifically</b> 16:5 19:21 25:2 27:7,22 32:6 32:15,22 36:17 39:18,25 44:7 48:22 58:19 68:25 69:1 75:18 85:1 94:15 104:4 105:5 106:24 111:7 125:1 126:10 130:22 131:3 <b>specifics</b> 36:20 50:19 95:20</p>	<p><b>specified</b> 105:3 118:10 <b>speculate</b> 30:24 41:4 <b>speeches</b> 88:9 <b>speed</b> 76:1,2,6 76:16 <b>spell</b> 25:23 <b>spelled</b> 19:2,10 <b>spend</b> 17:6 <b>spent</b> 17:10 <b>Spitsberg</b> 3:10 42:18 <b>split</b> 42:1 <b>spoke</b> 16:18,19 19:18 34:18 125:18 126:11 126:13 <b>Spritzberg</b> 44:2 <b>staff</b> 27:11 28:22 28:25 29:3,6,8 29:19,23,25 30:7,16,22 31:4,8,9 37:20 41:15 50:17,17 88:21 89:14 92:3,6,20,24 92:25 93:23 94:4,18 95:11 <b>stand</b> 7:20,23 8:1 <b>standard</b> 108:7 112:17 <b>standards</b> 105:3 <b>standing</b> 121:19 <b>standpoint</b> 124:7 <b>start</b> 7:5 43:5 48:22 67:11 68:19 <b>starting</b> 3:10 <b>state</b> 5:3,5 8:10 59:6,14 87:15 88:4,15 97:9 104:1 138:3,20 139:2,5</p>	<p><b>stated</b> 13:16 58:17 119:12 <b>statement</b> 12:11 56:10 107:22 119:21 <b>statements</b> 58:4 <b>states</b> 1:1 23:15 81:18 104:24 105:5 <b>statewide</b> 59:6 <b>statute</b> 97:10,21 98:4,15 103:7 104:1,23,24 105:1,4 110:14 <b>statutes</b> 97:10 124:8,16 <b>statutorily</b> 97:9 <b>stenographica...</b> 139:8 <b>step</b> 31:13,15,24 97:25 99:17,19 <b>stop</b> 61:13 <b>storage</b> 116:17 116:17 <b>Street</b> 1:23 5:3 <b>strict</b> 56:22 <b>strike</b> 21:15 46:12 47:13 48:22 75:9 78:21 87:6 102:25 <b>string</b> 3:10 123:4 125:11 <b>strong</b> 112:12 <b>stronger</b> 108:25 <b>struggling</b> 41:2 <b>studies</b> 14:7 55:20 56:1 75:11 <b>stuff</b> 135:13 <b>style</b> 24:18 <b>sub-part</b> 9:9 <b>subject</b> 42:18 43:3 44:9 47:7 51:2 54:10 56:22 65:17</p>	<p>66:2,12 88:13 101:10 102:6,9 102:10 110:24 120:6 124:20 <b>subjectively</b> 87:9 <b>subjects</b> 88:10 102:21 103:18 <b>subset</b> 114:2 <b>sufficiency</b> 27:20 <b>suggestion</b> 107:10 112:13 <b>Suite</b> 1:24 5:4 <b>suited</b> 102:17 <b>Sunshine</b> 38:19 <b>supervisor</b> 25:19,21 26:14 <b>supervisors</b> 120:25 <b>support</b> 39:1 64:18,20,21,25 65:1 76:9 93:24 94:1 <b>supported</b> 94:2 <b>supports</b> 65:9 91:21 <b>suppose</b> 66:23 74:20 78:19,22 91:11 <b>supposed</b> 119:10 <b>sure</b> 10:8 11:10 14:15 15:16 18:13 27:16 33:4 34:15 35:14 36:4 41:7 67:8 79:11 91:19 94:5 95:1 96:17 99:8 104:7 109:2 121:20 122:2 127:1 130:4,13 131:1,2 134:2 135:6 136:3,8</p>	<p>136:21 137:7 <b>Susan</b> 120:25 <b>suspicion</b> 98:4 <b>sworn</b> 5:13 138:8 <b>synonymous</b> 54:20,23</p> <hr/> <p style="text-align: center;"><b>T</b></p> <hr/> <p><b>T</b> 139:1,1 <b>T&amp;I</b> 54:7 <b>table</b> 86:7 <b>take</b> 7:3 26:6 36:5 46:9 60:25 64:3 65:13 86:2,7 98:7 112:25 113:14,21 123:15,21 129:22 132:17 <b>taken</b> 1:20 5:2 6:5 24:2 31:12 41:11 111:6 116:1 <b>takes</b> 111:1 <b>talk</b> 8:5 22:7 28:25 61:7 70:7 81:5 91:3 <b>talked</b> 30:13 54:15 89:9 116:12 135:25 135:25 136:1 <b>talking</b> 27:18 33:16 34:17 48:8 58:1 89:7 106:12 130:23 135:7,16 <b>talks</b> 83:21 103:7 <b>Tampa</b> 1:2,11 1:14,15,24 2:8 2:9,11,12 3:6 5:4,22 7:12,16 8:13,25 12:8 23:21 24:19 40:14 48:24</p>
--	---	--	--	---

49:2 54:4 101:2 118:1 <b>Tampa's</b> 48:2 59:20 60:19 <b>tangential</b> 49:25 <b>task</b> 93:17 94:12 <b>Tatiana</b> 3:13,15 47:6,17 51:1 <b>Tech</b> 54:7 <b>Technology</b> 54:8 <b>teen-age</b> 62:2 78:20,21 <b>Telephone</b> 2:3,9 2:13 <b>tell</b> 6:15 14:3,4 27:5 37:5 38:25 77:2 84:24 107:7 109:13 110:4 <b>telling</b> 41:6 84:18 113:22 <b>tells</b> 6:25 62:2 <b>template</b> 58:24 <b>ten</b> 66:23 119:4 <b>ten-thirty</b> 43:5 <b>ten-year-old</b> 67:12,14 71:15 73:6 75:22 78:6 <b>term</b> 44:14 52:19,20 53:8 56:25 68:9,24 68:25 69:1 70:5 77:4,21 81:6 82:15 <b>terms</b> 10:11 13:19 15:6,7 21:13 56:5 59:9 67:4,6 70:24 71:5 73:1 87:16 92:10 118:4,11 118:14,22 119:7 120:2 130:9,11,20	131:12,21 132:9,18 <b>Territo</b> 27:24 28:2,7 43:23 117:6 134:7 <b>testified</b> 50:3 117:16 136:9 <b>testifies</b> 5:14 <b>testify</b> 5:13 8:16 8:20 9:4 10:12 <b>testifying</b> 9:13 15:14 <b>testimony</b> 12:16 15:12 16:11,14 19:23,23 20:8 69:17 130:5 133:19 136:11 139:10 <b>thank</b> 103:6 123:14 137:22 <b>theoretically</b> 115:21 <b>therapies</b> 85:17 89:6 94:19 <b>therapist</b> 64:24 65:5,9,11 66:2 66:9,11,15,20 66:25 71:18 72:1 73:8 77:17 78:8,10 78:13,25 79:1 79:4 80:11,19 80:20 83:3,14 84:7 86:7,11 86:18 87:1,9 87:12,16 88:5 88:10 <b>therapist's</b> 66:1 72:5 77:13 78:8 84:12 86:12 <b>therapy</b> 4:6 7:17 7:17 8:5 43:4 45:25 47:7 48:2,25 49:2 49:12 50:5,8	51:9 52:19,21 52:22 53:8 56:2 58:2,5,6 59:16 61:9,10 61:23 62:21 64:8,16,16,17 65:2,12 66:4 66:13 72:2,18 72:19,20 77:19 79:5 81:24 82:7 83:8,17 83:20,25,25 85:7 86:18 87:1,23 88:5 88:22,25 89:1 89:10,10,15,18 89:19,25 90:4 90:17,18,21 91:1,3,6,7,23 92:5,20 93:9 95:18 96:19,24 97:17 100:24 101:4,22 102:13,22 104:14 105:9 107:4,5,22 108:8,11,23 111:14 112:2,9 112:23 113:11 114:4,18 115:1 115:9 116:5 117:16 118:12 120:16 123:9 126:1 128:9 129:11 <b>thing</b> 63:21 77:9 110:7 111:18 122:15 128:1 137:18 <b>things</b> 10:9 20:4 56:14,16 59:7 59:7 73:24 74:17 75:6 78:12 79:17 83:10,12 87:13 87:17 88:15	102:5,6 111:19 111:21 128:23 135:8 <b>think</b> 10:6,13 13:3,12,14 14:15 15:15 17:10 18:17 19:2 32:12 39:2 40:10,16 45:1 56:9 57:4 57:5 59:4,13 63:2 64:2 67:5 68:13 74:7 76:23 77:8,10 80:23,24 81:5 81:11,22 83:19 83:20 84:18,19 84:20 85:17 87:19 88:2,12 88:19 92:3,12 93:24,25 97:21 99:11 100:12 103:3 104:3 105:24 111:4 114:13,14 119:16,17 128:22 129:16 129:17 133:19 136:4,9 <b>thinking</b> 41:5,5 75:19 <b>third</b> 45:7 87:18 88:11 129:8 <b>thirty</b> 13:19 18:6,10 21:12 118:3 120:2 130:9,11,19 131:12,21 132:9 <b>thorough</b> 94:11 102:18 <b>thoroughly</b> 106:9 <b>thought</b> 52:5 86:1 <b>thoughts</b> 19:25	<b>thousand</b> 100:18 119:4 <b>three</b> 9:2 17:5 18:2,10,11 22:11 32:1 41:20 59:4 83:22 <b>threshold</b> 108:14 <b>tie</b> 77:10 <b>time</b> 1:25 6:8 12:19,20 16:3 17:6,10 18:23 26:2,5,9,12,14 27:13,22,23,25 28:9 36:12 43:22 45:5,22 56:23 63:18 78:23 79:1 86:9 91:25 92:2 98:24 102:23 113:21 124:17 137:2,3 <b>timeframe</b> 13:21,22 15:8 <b>times</b> 16:24 17:4 17:5,13 18:1 18:10 19:17 99:11 121:9 <b>title</b> 22:8 25:25 26:7 32:5,6 43:19 114:18 115:16 130:14 <b>today</b> 8:17,24 12:10,16 15:12 15:14,24 16:11 16:14 20:8 42:25 69:17,23 91:5 103:9 117:16 121:9 123:9 127:6 <b>told</b> 74:21,22 81:4 109:24 121:2 <b>tomorrow</b> 132:22 133:6
--	--	--	--	---

137:2,4,17 <b>top</b> 12:2 59:1 68:2 96:24 107:4 110:14 123:13 128:8 129:4 131:5 <b>topics</b> 9:3,5 15:18,21,23 47:24 54:9 89:20 101:6,11 <b>total</b> 17:6,9,11 18:5,8,23 94:19 <b>totality</b> 63:24 70:15,19 85:24 <b>totally</b> 81:3 94:6 <b>touch</b> 88:10 <b>training</b> 25:10 114:21,24,25 115:4,6 <b>transcript</b> 6:7 11:12 139:9 <b>transcription</b> 139:9 <b>transgender</b> 7:21 81:19 <b>transition</b> 64:19 <b>treatment</b> 61:11 65:20 72:16,20 80:12 83:24 <b>trouble</b> 15:25 <b>true</b> 66:18 131:16 139:9 <b>truth</b> 5:13 <b>truthfully</b> 8:17 8:21 <b>try</b> 61:1 63:3 65:14 85:10,11 93:15 94:5 96:23 97:3 99:9 132:25 <b>trying</b> 29:17 40:16 45:24 54:25 55:2 82:11 83:7 85:22 106:4	108:9 109:8 <b>Tuesday</b> 42:17 <b>turn</b> 131:9 <b>twenty</b> 13:7,18 14:1,12 118:3 118:15,24 120:3 133:12 133:18,20 134:6,20 135:2 <b>twice</b> 19:20 <b>two</b> 17:12 18:17 28:1 37:9 55:6 59:3,6 119:16 133:20 136:16 <b>two-thirds</b> 97:2 <b>type</b> 122:15 <b>typed</b> 11:12 <b>types</b> 14:5 88:22 89:18 90:4,18 91:23 101:9 105:6 <hr/> <b>U</b> <b>Uh-huh</b> 55:24 67:16 <b>ultimate</b> 101:24 101:24 <b>ultimately</b> 36:25 55:14 56:14 57:8 60:5 70:13 90:25 105:13 108:4 113:3 114:8,19 115:22 <b>unclear</b> 62:22 71:11 <b>undergoing</b> 64:19 <b>undergraduate</b> 22:24,25 <b>undersigned</b> 138:6 <b>understand</b> 6:15 7:13,18,21,24 8:2,8 9:11,18 13:13 14:18	33:14 40:12 41:9 42:20 49:7 54:6 65:14 67:8,10 79:11,14 84:18 85:9 89:7 91:22 94:6 95:1 99:8 108:20 <b>understanding</b> 8:23 9:4,6,9 13:25 16:1 20:4 31:11,17 31:20 34:4,19 64:20,25 93:8 109:17,21 112:15 116:20 117:2,5 118:17 119:3,10,14 120:5 123:23 124:6 133:11 133:22 <b>understood</b> 6:20 19:15 131:7 <b>undertake</b> 49:17 112:14 <b>unfortunately</b> 96:22 <b>unique</b> 123:15 123:21 <b>United</b> 1:1 81:18 <b>University</b> 22:19 <b>unpaid</b> 103:3,12 <b>unusual</b> 111:11 111:15,18 112:3 <b>Update</b> 96:4 114:5 <b>updated</b> 12:13 <b>use</b> 8:1 63:16 77:19 78:17,19 82:15 122:13 <b>uses</b> 73:1 76:11 98:4 <b>usual</b> 29:4,12,14	29:15 41:24 42:4 <b>usually</b> 23:22 76:5 122:11 <hr/> <b>V</b> <b>v</b> 2:10 24:19 <b>vacate</b> 110:18 110:22,25 <b>vague</b> 71:23 <b>validation</b> 103:5 <b>various</b> 50:12 53:21 54:20 55:8,21 58:4 75:10 118:13 130:25 132:3 <b>VAZZO</b> 1:8 <b>Vazzo's</b> 3:7 <b>veracity</b> 75:3 <b>verbal</b> 29:9,13 <b>verbally</b> 30:1 <b>verbatim</b> 69:25 77:1 <b>Verification</b> 12:2 <b>verified</b> 12:7 117:20 <b>version</b> 36:7 114:8 <b>versions</b> 35:25 <b>versus</b> 89:5,10 90:25 95:5 105:22 <b>viewed</b> 40:7 <b>violate</b> 51:10 52:2 65:11 <b>violated</b> 62:6 66:17 <b>violates</b> 83:3 <b>violating</b> 63:14 64:10 66:2 <b>violation</b> 61:19 64:12 65:23 66:7 70:10,23 72:3 73:13 76:8,11,15,20	78:2,13,16 79:7 80:13,18 80:21 81:9 82:8 83:6 84:6 84:17 86:1,4 86:17 87:3,8 87:15,20 88:7 97:23 98:6,9 98:10,12,20,22 99:2,3,7,10,12 99:14,16,18,23 100:5,9,17,20 107:7,18,24 108:15,17,22 109:6,14,19 110:1,21 111:13 112:2 112:21 113:9,9 113:14 124:2 124:15,18,23 <b>violations</b> 101:9 124:20 <b>violation</b> 88:16 88:16 98:10,16 100:18 101:19 102:1,19 124:17,22 <b>violators</b> 66:5 <b>violence</b> 124:21 <b>virtue</b> 136:15 <b>voluntary</b> 89:10 <b>volunteer</b> 81:2 <b>volunteers</b> 103:3,12 <b>vote</b> 31:12 35:20 <b>voted</b> 36:12 127:14 <b>vs</b> 1:13 <hr/> <b>W</b> <b>wait</b> 137:16 <b>walk</b> 97:16 <b>walked</b> 132:15 <b>want</b> 5:23 9:3 10:5 11:3,22 13:5 52:22
---	---	---	---	---

63:9 68:3 72:25 73:18 75:1 79:2,2,20 79:21 88:20 89:13 92:11 100:13 110:2 132:2,7 136:19 <b>wanted</b> 20:3 60:2 82:23 84:13,13 121:5 127:8 <b>wants</b> 63:5,7 65:7,12 86:13 121:1 <b>wasn't</b> 51:20 54:9 64:1 123:22,22 135:15,19,20 135:20 136:8 <b>way</b> 19:10 29:12 29:15,15 38:4 41:13 46:2,23 46:24 53:5,11 62:22 65:15,18 71:10 76:13 91:18 97:2 104:3,3 119:21 120:23 128:12 129:21 134:24 <b>ways</b> 46:5,17,19 69:2 104:21 <b>we'll</b> 11:14 16:5 35:18 61:1 109:13 132:24 136:12,12 137:11,16 <b>we're</b> 5:21 27:18 34:17 38:21 98:18 102:2 106:3 115:17 135:7 <b>we've</b> 78:4 130:5 132:4 <b>wear</b> 77:9 <b>Webster</b> 69:20 <b>Webster's</b> 67:24	68:1,11,15,16 68:20 69:3,10 70:1,11,25 <b>week</b> 19:21 <b>Wenrick</b> 120:25 <b>went</b> 5:24 36:1 57:5,9,14 73:7 <b>weren't</b> 41:5 93:12 94:13,15 133:2 <b>West</b> 47:7,25 <b>Western</b> 22:18 <b>Whatever's</b> 107:1 <b>White</b> 56:9 <b>Williams</b> 2:10 10:15 11:8,11 11:24 13:4,21 16:20,25 17:11 17:17 19:6,9 19:13 20:6,12 20:16 21:3,4 37:15 39:11 45:8 62:8 63:15 65:17 71:22 72:9 76:22 79:8,23 80:2 85:1,9 86:20 91:8 92:8,14 127:16 129:25 130:4 130:11,19 131:5 132:12 132:14,16 133:1,10 135:3 135:16,19 136:4,8,12,21 137:3,19,22 <b>Williams'</b> 21:9 <b>willing</b> 132:24 <b>withheld</b> 120:1 <b>witness</b> 5:1,15 5:25 10:25 13:14,23 42:10 62:13 63:19 65:20 71:24	72:15 76:23 79:11,24 80:4 85:11 86:25 127:24 130:15 130:16 138:10 139:10 <b>witnesses</b> 137:22 <b>word</b> 36:17,18 64:7 77:20 98:4 <b>worded</b> 72:10 79:9 <b>words</b> 72:23 76:2 125:6 <b>work</b> 26:18,21 35:17,23 36:7 54:7 122:11 133:14 <b>worked</b> 22:12 <b>working</b> 12:20 14:4 16:3 <b>works</b> 32:12,12 43:24 <b>world</b> 83:11 <b>worth</b> 21:25 <b>wouldn't</b> 38:24 41:25 52:2 57:5 <b>write</b> 100:10 <b>writings</b> 88:9 <b>writs</b> 24:1 <b>written</b> 11:18,19 29:10 44:18 65:24 103:18 112:17 117:19 117:25 128:12 <b>wrote</b> 58:21 60:17 128:20 128:22 <hr/> <b>X</b> <hr/> <hr/> <b>Y</b> <hr/> <b>yeah</b> 13:14 18:9 44:7 59:4,14	62:13 67:11 69:7,25 70:7 74:7 78:1 79:24 80:4,23 90:15 95:8 102:15 107:2 110:10 136:6 <b>years</b> 22:11 66:23 78:20 <b>yesterday</b> 95:25 96:1 113:25 120:11 135:15 135:23 <b>youth</b> 83:19 91:16 <hr/> <b>Z</b> <hr/> <b>zero</b> 113:17 <b>zip</b> 8:14 <hr/> <b>0</b> <hr/> <b>001706</b> 125:10 <b>001736</b> 42:15 <b>001738</b> 45:9 <b>004427</b> 129:4 <b>004830</b> 51:3 <b>004832</b> 47:5 <b>004839</b> 57:23 <b>004840</b> 52:11 <b>004938</b> 123:2 <b>005651</b> 128:8 <hr/> <b>1</b> <hr/> <b>1</b> 69:7,8 <b>1:47</b> 1:25 <b>11</b> 3:5 9:5 <b>12</b> 9:5,8 <b>122</b> 3:22 <b>125</b> 4:2 <b>128</b> 4:5,7 <b>13</b> 47:6 <b>14</b> 138:21 <b>162</b> 97:10 101:13 105:5 124:8,8,14 <b>18</b> 3:5 11:15,16	<b>19</b> 3:9 42:8,9,11 42:12,12 <hr/> <b>2</b> <hr/> <b>2</b> 95:25 114:3,13 114:16,23 117:10 120:12 121:12 <b>2/13/2017</b> 3:13 <b>2/24/2017</b> 3:16 <b>2/27/2017</b> 3:18 <b>2/27/2107</b> 3:21 <b>2/6/2018</b> 3:11 <b>20</b> 3:12 42:8 47:2,4 <b>201</b> 1:23 5:3 <b>2015</b> 22:16 23:14 <b>2017</b> 43:5 45:13 47:6 52:10 57:23 123:10 125:14 <b>2017-47</b> 7:16 81:15 <b>2018</b> 1:23 42:17 138:11 139:14 <b>2019</b> 138:21 <b>21</b> 3:14 50:23,25 <b>22</b> 3:17 52:7,9 <b>23</b> 3:19 57:19,21 <b>24</b> 3:22 45:13 51:1 122:23,24 <b>25</b> 4:2 125:7,9 <b>26</b> 4:5 128:4,5 128:19 <b>27</b> 4:7 43:5 52:10 57:22 128:16,17 129:2 <b>2nd</b> 46:1 <hr/> <b>3</b> <hr/> <b>3</b> 113:24 114:6 114:11 <b>3/16/2017</b> 3:23 <b>3/9/2017</b> 4:4
--	--	---	---	---

<b>31</b> 1:23 <b>315</b> 2:12 8:12 <b>3200</b> 1:24 5:4 <b>32854-0774</b> 2:3 <b>33601-0380</b> 2:8 <b>33602</b> 8:13 <b>33602-5211</b> 2:12 <b>33603</b> 1:24 <b>380</b> 2:8 <hr/> <b>4</b> <hr/> <b>4</b> 27:18,19 61:4 81:16 <b>407-875-0770</b> 2:4 <b>42</b> 3:9 <b>47</b> 3:12 <hr/> <b>5</b> <hr/> <b>5</b> 3:2,3 9:1 <b>5:29</b> 1:25 137:24 <b>50</b> 3:14 <b>52</b> 3:17 <b>540774</b> 2:2 <b>57</b> 3:19 <hr/> <b>6</b> <hr/> <b>6</b> 9:5 42:17 123:10 <b>6th</b> 138:10 139:14 <hr/> <b>7</b> <hr/> <b>723.083</b> 110:15 <hr/> <b>8</b> <hr/> <b>8:17-cv-02896...</b> 1:2 <b>80</b> 129:9 <b>800-671-1776</b> 2:3 <b>813-221-2626</b> 2:9 <b>813-274-7599</b> 2:13 <hr/> <b>9</b> <hr/>	<b>9</b> 9:5 105:19 125:14 <b>936928</b> 138:20			
---	---	--	--	--