

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

INTERVIEW OF:

CARL PERSIS

DATE TAKEN: FEBRUARY 17, 2014

TIME: 9:45 A.M. - 10:44 A.M.

PLACE: KANEY & OLIVARI, P.L.
55 SETON TRAIL
ORMOND BEACH, FLORIDA 32176

1 APPEARANCES:

2 JONATHAN KANEY, ESQUIRE

Kaney & Olivari, P.L.

3 55 Seton Trail

Ormond Beach, Florida 32176

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

1 THEREUPON,

2 CARL PERSIS,

3 was called as a witness and, having first been

4 duly sworn, testified as follows:

5 BY MR. KANEY:

6 Q. Mr. Persis -- and may I call you Carl?

7 A. Yes, you may call me Carl.

8 Q. You were a candidate for chair of the county
9 council in 2012; is that correct?

10 A. That's correct.

11 Q. Did you receive any support from Waverly Media,
12 Inc. -- LLC, rather?

13 A. I did not receive any support from Waverly other
14 than what I paid for. That would be the best way of me to
15 characterize their support.

16 Q. What did you -- what did you pay for and obtain?

17 A. I paid for ads in the Floridian magazine. I'm
18 assuming that's part of Waverly.

19 Q. Yeah.

20 A. And I paid for bus benches after the primary. I
21 didn't have any bus benches for the primary, but I
22 purchased -- rented a lot of bus bench space after the
23 primary. I'm trying to remember if I had any other, what
24 you'd call support. I don't recall them making a
25 contribution to my campaign either before or after. I don't

1 remember if they did.

2 Q. Do you know who the principals of Waverly are?
3 Not you, you're the principal.

4 A. I know who the principals of Waverly are now,
5 yeah. I suspect that -- but when I was first purchasing, I
6 guess, ad space in the Floridian magazine, it was Manny
7 Borneo who I was dealing with at that time. And I think
8 Josh Wagner was -- I think Josh encouraged me. I knew Josh
9 was involved somehow with the magazine because -- this may
10 be off point -- but when the magazine was about to be
11 launched, Josh had come to me and he said, you know, the
12 Carter -- Carter family, Vince Carter? And I said, yeah,
13 yeah, I know them. And he said, do you think it would be
14 possible if you could -- if we could talk with Vince and see
15 if we could get him on the cover of the first issue of
16 this -- of their magazine? And so I said, well, you know, I
17 don't know. And then I -- but anyway, long story short, I
18 did get with his -- with Vince's mom and they talked, and
19 they talked to her, and they got ahold of Vince, and Vince
20 was on the cover of that -- on the first issue of the
21 magazine.

22 And then, I guess, pulling back to your
23 question -- and then once the magazine came -- came out and
24 then I received the magazine, and then when my campaign was
25 about to start, then they contacted me and said, oh, we

1 really, really need to get you in this magazine. This would
2 be good for your exposure and so forth and so on. And
3 then -- and then I did buy a few ads. But, of course,
4 things went south pretty fast with the magazine. And what I
5 thought I was going to get and when it was supposed to come
6 out, the deadlines and everything, none of that -- it
7 never -- it never came out the way they said it was going to
8 come out, and it was a problem. And I sort of severed my
9 relationship with the magazine part of Waverly after the
10 primary.

11 Q. Do you know Ramara Garrett?

12 A. I did -- I never knew Ramara Garrett until after
13 the primary was over. And I became aware during the
14 primary, particularly during the last month, I guess,
15 that -- month of August, that the magazine, whoever they
16 were, I didn't really know a lot about them, but the
17 magazine was really supporting Ted, Ted Doran.

18 And so when the primary ended, I -- I received a
19 call from Ramara Garrett, and she said, oh, I think we
20 should meet, and let's see how we can help you in the county
21 council race. And, again, I didn't know her. And so I
22 called Frank Bruno, and I asked Frank Bruno if he knew her.
23 And he said, yes, that he did. And I said, well, she had
24 called me, wants to meet me. Says she wants to, you know,
25 help me with the campaign. And I said to Frank, I said,

1 would you be willing to meet with us? And he -- and he
2 said, sure.

3 So we met at Panera out on International Boulevard
4 one morning, the three of us. Frank introduced me to her.
5 We sat down. Frank stayed about five minutes, he left, and
6 then she really pitched to me how Waverly, I guess, could --
7 could help me with my campaign for county chair. And then I
8 expressed to her how disappointed I was in the operation of
9 the magazine. And I said, you know, I paid all those -- the
10 money, and I was supposed to get this and that, and, you
11 know, two pages and one page, whatever it was was supposed
12 to be published on a certain date and it never came out.
13 And then she went on to say, well, that was all Manny's
14 fault and he is -- he no longer has that title any more.
15 We've moved him to a different division of it. And she
16 said, you'd be dealing directly with me now, or some other
17 girl there, I forget. And -- and then I said, well -- I
18 said, you know -- I just listened. I didn't make any
19 commitment. And then I said, but I am interested, perhaps,
20 in -- in renting some bus benches. And she said, well, to
21 call John -- is it John Brown? John? Is that his name? I
22 can't remember.

23 Q. There was a man that worked there named James
24 Brown.

25 A. James Brown, yeah. Jim Brown. So I said, okay.

1 I said, well, I'll find out about that and -- and that was
2 really -- really it. She -- that was our only time that we
3 met. I'm trying to think if we met again. We may have met.
4 Yeah, we probably did meet again in the offices of the
5 Floridian, I think, when she was trying to convince me one
6 more time to spend more money on some ads in the magazine.
7 That was it. She never -- she never called me. I didn't
8 have much contact with her.

9 Q. Do you know Charlie Lydecker?

10 A. Yes.

11 Q. How do you know him?

12 A. Well, I have -- I don't know when I first met --
13 met Charlie. I can't really remember. I think it may have
14 been when -- I can't remember. It was during a political
15 fundraiser for somebody that he had at -- at his house. And
16 so I have known Charlie for, I would say, at least 20 years.
17 And Charlie offered his -- offered to help me in this
18 campaign for county chair right off the -- right out of the
19 shoot. I mean, as soon as I announced I was going to run,
20 he said, you know, we certainly would be willing to help
21 you.

22 And then when Ted Doran got in the race, which was
23 right just before qualifying ended, Charlie took a very
24 active role in my race. And he was, you know, just
25 cautioning me. He said, this is -- this is going to be a

1 very tough -- a very tough race. You know, Ted's going to
2 spend a lot of money and he desperately wants this. And he
3 said, so you need to be ready for a tough -- a tough fight.

4 So, yeah, I got to hear from Charlie Lydecker, I
5 would say, from June until -- until August we probably spoke
6 every week.

7 Q. What was the nature of the conversations?

8 A. Really it was campaign strategy. You know, it was
9 what are you doing? How are you going to spend your money?
10 And so we would meet. And then he wanted to know -- he
11 wanted me to tell him when I had any forums, debates, and
12 that he said he would be -- be willing to help coach me with
13 those. So that's -- that was the nature of our
14 conversations.

15 Q. Did you ever discuss the Waverly advertising with
16 Charlie?

17 A. Charlie advised me -- I think this was -- well, it
18 was probably before the primary as well. He just -- he just
19 had a bad feeling about Waverly. He just said, I wouldn't
20 spend any money with them. He said, there's -- there's --
21 they're just corrupt. He -- I remember him use that word
22 "corrupt." He said, you just can't trust them. And then I
23 was telling him, yeah, well, I'm figuring that out just with
24 the money I was trying to get with the ads in the magazine
25 and them saying one thing and not being able to do what they

1 promised. So he -- he cautioned me about that, and that was
2 in the summer.

3 And when the primary was over -- after the primary
4 was over, we didn't really -- Charlie and I really didn't
5 meet much after that. Charlie -- which, I just -- I told
6 Charlie, I said, well, look, I'm not going to do much. I
7 said, first of all, I don't have any money left after this
8 primary, so I'm not going to be able to spend a whole lot of
9 money on anything. But I said, I think I am going to buy
10 bus benches. And Charlie was, like, well -- he said, you
11 know, it's up to you. He said, but -- he said, just make
12 sure that you -- that you pay for them. And I said, well,
13 yeah, I'm going to pay for them. How else am I going to get
14 them? And he said -- and he said, well -- he said, you
15 know, just -- just make sure that you pay -- that you pay
16 for them. And I said, yeah, I already inquired. They're
17 \$50 a week, 200 a month per bench. And I said, I want to
18 see how far my money will go and try to get a good -- a good
19 distribution of them in different parts of the county. So
20 he said -- so, you know, so he was -- he was okay with that.

21 Q. What did you think he meant by saying, make sure
22 you pay for them?

23 A. Well, you know, I found that as kind of an odd --
24 an odd -- an odd comment. He -- I just said to him, I go,
25 well, sure, I'm going to pay for them. I don't know whether

1 he thought they were going to try to offer them in-kind or
2 do something like that, but he never said those words. He
3 just said, make sure that you pay for them. That was --
4 that's what he said.

5 Q. Do you think that Charlie was not happy with the
6 fact that you were doing business with them?

7 A. Oh, yeah. I don't -- I think he would have
8 preferred that I didn't do anything with them. Like I said,
9 he just had a -- well, he -- you know, Charlie had a bad
10 feeling about -- about Ted Doran. They were supporting Ted
11 Doran, so that put Charlie at odds with Waverly right from
12 the start. And so he -- his feeling was, why would you give
13 any -- spend any money on an organization that is really
14 supporting your -- your opponent.

15 Of course, after the primary, Ted Doran wasn't my
16 opponent any longer, and I didn't really see much of a
17 connection between the bus bench business and the magazine
18 part -- part of it. I -- this guy, Jim Brown, was not a
19 person that I had spoken to previously when it came to
20 advertising in the magazine. So I thought, well, this is a
21 whole different venture. Let's see how this goes.

22 Q. Of course you've since become aware of the program
23 they were following with the in-kind contributions?

24 A. Yeah.

25 Q. News coverage?

1 A. Yeah.

2 Q. When you were speaking with Ramara Garrett, did
3 she make any overture to you that suggested you could get
4 more than you paid for or pay less than you got?

5 A. I don't think so. I think she just said she -- I
6 remember her saying, you know, Ted was on a -- Ted Doran was
7 on a bunch of bus benches. There should be a lot of
8 availability now. Gave me the name of Jim -- Jim Brown.
9 You contact Jim Brown, he will -- he will work with you.
10 But never anything about we'll give you some for free or
11 reduced rate or anything. No.

12 Q. Have you -- have you talked about the campaign
13 with other candidates that were there since the time?

14 A. Well, when other candidates -- I talked with Andy
15 Kelly, because Andy had his came on bus benches. So I asked
16 Andy Kelly if he was happy with -- with what he got and --
17 before I got into it, and he -- and he said, oh -- he said,
18 yeah, yeah, yeah. You know, he said, they'll make you a
19 good deal. He said, you'll get -- and I said, yeah. I
20 said, well, I found out it's -- it's like, 200 a month or
21 something. And he kind of winked at me, like, oh, yeah,
22 well, you'll get -- you'll get more than that. And -- and I
23 said, oh, so -- but, you know, I didn't -- I never got -- I
24 never got more than for what I paid.

25 And then I discovered that -- that it appeared

1 when I looked at Ted Doran's campaign reports that it
2 appeared that he had a lot more bus benches than he had paid
3 for. And they -- they didn't appear to be in-kind
4 contributions, or -- he just had a lot of bus benches.
5 So -- and it looked like Andy had more bus benches than what
6 he had paid for. Those were the two that I think had -- I
7 would guess Ted had the most bus benches of anybody. Maybe
8 Andy was second. I think Josh Wagner was probably third.
9 I'm trying to think before the primary election.

10 I never spoke with -- with Josh about bus benches
11 or the cost of them or anything. I knew Josh and Ted were
12 very close, and, again, Josh's kind of association with the
13 magazine and Manny and the whole thing. I just thought, you
14 know, I better just stay away from him and --

15 Q. Did you hear -- during that campaign, did you hear
16 anyone say that they thought that Waverly was giving away
17 signs, giving away bus bench signs?

18 A. No. No, I never heard anyone say that other
19 than -- other than that innuendo, I guess, I perceived
20 getting from Andy Kelly.

21 Q. How did you understand what Andy had said? What
22 was the innuendo?

23 A. Well, just that when I was saying, yeah, I
24 understand the cost is \$50 a week, 200 a month, and Andy
25 just gave me a look, like, you know, you'll -- you'll do

1 better. He said, it will get better than that, or words
2 along -- words to that effect. So I -- I was thinking
3 that -- and I didn't -- I didn't clarify this with Andy, but
4 I was thinking to myself when he says that, well, maybe if
5 you buy a certain number beyond a certain point, you get a
6 break in the brace or you get some for free or -- maybe
7 that's what he meant by that. But I forget how many I
8 purchased, but I remember purchasing quite -- quite a few.
9 And there was -- Jim Brown never mentioned to me, well, if
10 you rent ten, you get five free, or anything like that. He
11 never -- he never offered. I never asked, but he never
12 offered either.

13 Q. When you were on the council leading up to that
14 race -- of course, you resigned to run before the race,
15 shortly before.

16 A. Yes.

17 Q. Was there a noticeable division between the
18 members of the council, four to three split on various
19 issues?

20 A. Yeah. It was -- it wasn't every issue, but. We
21 had -- we had some four to three -- we had a lot of four to
22 three -- not a lot, but we did have our four to three votes.
23 I can't recall if always -- it was always the same four
24 against the same three. I would say Josh and Joyce were on
25 the same side most of the time, clearly. Other than

1 those -- other than those two, it's really hard to say.

2 Q. If some of these other people that we've talked to
3 were to say that it was a -- an open secret, or a known -- a
4 known fact that Waverly was giving away or doing this
5 in-kind game with candidates, would you -- would you not
6 agree with that statement that it was widely discussed among
7 the candidates?

8 A. I never heard that. I never heard that Waverly
9 was giving away benches. I never heard that from -- you
10 know, I just never heard that from other candidates.

11 Q. Well, looking back at it now, in light of what's
12 been reported in the newspaper, as you reflect on the
13 campaign, your discussions with Ramara, Charlie, does it --
14 does it fit into that pattern now? Can you -- can you
15 see -- do you think you can see, in retrospect, what they
16 were up to?

17 A. Oh, yeah. Yeah. You know, you can kind of see
18 it. And Charlie was obviously spot on about them being
19 corrupt and -- and cautioning me not to have my name
20 associated with them, and -- and then when I see it all, you
21 know, just roll out now, then I just thought, man, you know,
22 I'm so glad that I wasn't part of it. And, you know, it
23 just -- whoa. Because, you know, I don't -- I mean, there
24 may be a whole lot more that's going to come out of this
25 that I don't know about yet. But as I see -- as I see the

1 characters who were involved in it, you know, now, and
2 who -- you know, their tentacles were out there, I guess a
3 little bit further than I thought. But, you know, they
4 were -- I guess the -- the democrat -- I mean, they were
5 supporting democrats. I mean, that seems to be obvious now.
6 But they didn't reach out to me --

7 Q. And you are a democrat, too?

8 A. And I am a democrat. So they were selective, I
9 guess, in which way they wanted to go. And, you know, I --
10 I look back at it now, Jon, and I think, well, maybe Ted had
11 something to do with that. I don't know. Ted probably, you
12 know, was very upset when he lost, and maybe he just
13 couldn't -- I don't know how much Ted was involved with
14 the -- with Waverly, or he and Josh, or whatever how much
15 money they had into it, but maybe it was just tough for him
16 or for them to say, man, we can't -- we can't support Carl
17 after what he did to me, or -- you know, I just don't know
18 if that had anything to do with it. But it seems odd
19 because Andy -- Andy Kelly was a democrat. Obviously Joyce
20 Cusack's a democrat. Bruno, Pat Northey. But I'm not
21 real -- you know, I'm not how sure involved in any them --
22 how involved any of those folks were with -- with Waverly,
23 other than, as I mentioned earlier, I knew Andy had some
24 help. And obviously Josh did, and obviously Ted did.
25 Beyond that, I'm not -- I wasn't aware of any obvious signs

1 of Waverly helping them.

2 Q. When you "say had some help," what does that refer
3 to?

4 A. Well, I think that they gave them assistance
5 advertising that they didn't pay for. I mean, I think
6 that's the kind of help that they gave them. And they
7 didn't report it as in-kind or -- I mean, there doesn't seem
8 to be any -- any real paper trail of -- of their
9 contributions to any of these candidates.

10 Q. Were you aware at any time that the Waverly folks,
11 Ramara and Mr. Brown, with the bus bench deal, were they
12 supporting Jason Davis?

13 A. I -- I wasn't aware of that, either before or
14 after the primary. I wasn't aware of any Waverly support
15 for Jason Davis. I mean, I don't know where you draw the
16 line between Waverly and Ted Doran. I know after the
17 primary, I believe Ted -- Ted Doran was, from what I heard,
18 supportive of Jason Davis, trying to help out in some ways.
19 I'm not sure exactly how, but. As far as the other names
20 you mentioned, I didn't -- I don't think Jason Davis had his
21 name on a bus bench. I'm not sure. I don't think he did.

22 Q. Were you aware of the campaign in Southeast
23 Volusia where Deb Denys was opposed by Justin, Justin
24 Kennedy? I think that's his name.

25 A. Yeah, Kennedy and Hathaway.

1 Q. Hathaway.

2 A. Yeah. Both of them are democrats. And Justin
3 Kennedy -- I forgot about that. Justin Kennedy was on bus
4 benches. And Justin Kennedy was -- I thought he said he was
5 helped by Josh and Ted when he was running. And Justin --
6 of course, Justin lost in the primary and then Hathaway
7 continued. And Hathaway got on some -- some bus benches
8 down in southeast. I know both of them, but neither of
9 them -- Hathaway never told me about whether he got any
10 deals or anything. I never really asked him about it.

11 Q. Well, did Justin say anything like that?

12 A. Justin just -- no, I don't really believe he said
13 anything about it. He just said that Josh was very helpful.
14 He'd say Josh and Ted in the same sentence, so -- but, no, I
15 don't -- I don't recall Josh -- Justin Kennedy saying
16 anything about getting a deal or a good break. But I think
17 it was -- I think he said it was Josh that suggested that he
18 get on some bus -- bus benches.

19 Q. One of the things that the county council's
20 ordinance, in setting up this investigation, they said one
21 of the questions is, was there, I don't want to say
22 conspiracy, but was there a plan among the principals here
23 of this Waverly operation and their -- their close
24 associates seeking to gain control of the council, get at
25 least that fourth vote to advance their agenda. In

1 retrospect, do you -- do you believe that might have been
2 the case?

3 A. Yeah. Oh, yeah. Yeah, it was clearly the case.
4 I mean, it was -- it was clearly evident that, you know,
5 Josh wanted Ted to be the chair. And then they felt like
6 with the -- with the two of them and -- and with Joyce, and
7 then pick up the other vote from wherever that would have
8 been at that point -- point in time, but they felt like they
9 could control council actions from that point on. And I
10 know Josh was always wanting to help out his friends at
11 the -- was it Benedict, I have that name right, Advertising?

12 Q. Yeah.

13 A. Yeah. Yeah. So -- so, yeah, I -- I think that
14 was rather obvious.

15 Q. How -- how was he helpful to Benedict?

16 A. Well, I think in the Floridian magazine, I think
17 Benedict did a lot of work with that magazine. I think it
18 was Benedict that ran Ted's campaign, did their, you know --
19 the website, did -- did all of the work, and it was quite a
20 bit of work there. So, you know, I think that was just
21 one -- one aspect of it. But, yeah, that's -- that's what
22 they wanted.

23 Q. Was Deb Denys on the council while you were there?

24 A. Deb Denys? No. No. I don't think so. Joie
25 Alexander was there. I was there. Yeah, Bollenback -- was

1 the -- was the bus person, right?

2 Q. Yes.

3 A. I was trying to remember, yeah.

4 Q. Are you familiar with a situation where Josh wrote
5 an e-mail to Ken Fischer, who was then ahead of Votran --

6 A. Votran, yeah.

7 Q. -- regarding the RFP draft that was out there for
8 rebidding the contract to provide the bus benches?

9 A. Just vaguely, yeah. Yeah. I don't recall
10 the substance of it. You know, Josh had -- Josh was -- I
11 think, at various times, would try to generate -- or try to
12 generate some policies or things that might help his
13 business associates, or just help his friends, and the bus
14 bench thing could have been one example. Trying to change
15 some ordinances down on the beach from time to time to allow
16 special events or activities, that, come to find out later
17 that maybe the people that were going to throw these events
18 were friends of his or -- so, you know. It didn't -- those
19 kind of things didn't occurred that often. It's not like it
20 was an every month event. But I would -- I would learn
21 about it later, you know. Figure it out.

22 Q. Did you ever notice him taking particular interest
23 in the Ocean Center management?

24 A. Talking about Josh now?

25 Q. Yes.

1 A. Well, Josh is -- you know, the thing with
2 the Ocean -- well, he didn't -- I guess it kind of goes back
3 to when Ted was on -- when Ted became a member -- I think
4 Joyce appointed Ted to the Halifax Advertising Authority,
5 the HAAA board. And then -- and then Ted became the --
6 became the chair of that organization. And I noticed Josh
7 had just a big interest in that. And, again, it was -- it
8 was, to me, kind of curious, like, why do you -- why do you
9 go to those meetings? I mean, why does -- what's the whole
10 point of that? And he is -- his -- Josh was very, again,
11 concerned about the advertising dollars, like where we're
12 going to -- where this group is going to spend their
13 advertising dollars. And, again, I'd always get back to
14 where I thought his friends or something in the advertising
15 industries that he knows -- because Josh had -- I think Josh
16 had a minor in advertising in college, and he was just
17 always interested in that.

18 And so then when Ted became the chair, and then
19 when Ted fired the executive director of that organization,
20 which came as a surprise to a lot of people, then it was
21 like Josh and Ted just became even closer, I thought, and
22 most people thought. And then Ted went on a -- took it upon
23 himself, really, to almost hire the new person. And then
24 Ted took it upon himself to almost -- to arrange a contract
25 with that person. And then, you know, that didn't fly well

1 with members of the county council because he didn't have
2 the authority to offer some of the things that he was
3 offering. Well, this -- I forget the guy's name already. I
4 know he's been here and -- he's gone already.

5 Q. Hentz?

6 A. He's gone. Yeah. Jeffrey Hentz. So, anyway,
7 there was there was a -- Josh had, I guess, a real issue
8 with the way the Ocean Center was being operated. And so
9 Jeff Hentz -- I'm sure they filled Jeff Hentz's ear with all
10 of that. Jeff -- Jeff Hentz had an idea of doing things
11 differently up at the Ocean Center. Well, that didn't go
12 real well with Donald Poor, who's the director of the Ocean
13 Center, so they never got along. There was always a --
14 there was always a battle there. So Josh was never very
15 pleased with how the Ocean Center was being operated. And
16 when -- and they were really counting on Jeffrey -- Jeff
17 Hentz to -- well, to really have more influence in the
18 management of the Ocean Center, and that -- that really --
19 that didn't really happen the way I think Ted and Josh had
20 planned, because the county council was really more
21 supportive of Donald Poor than they were of Jeff Hentz.

22 And then there was such a backlash on the HAAA
23 board to Ted's style of leadership and all of the changes
24 that he was trying to make, that eventually Ted's
25 chairmanship came to an abrupt end. And then, subsequently,

1 Ted -- I don't know whether he resigned from the board or
2 his term ran out, but he wasn't -- he was never a factor.

3 It's funny when you -- when I look back at it now,
4 I just see all this -- all that turmoil and everything, how
5 it just exploded here, and then now it's gone, and Ted's
6 gone, Hentz is gone. It's like -- it's like all for
7 nothing.

8 Q. We talked about there was a plan afoot, and that
9 there was an agenda. Would it -- would it seem to you that
10 part of that agenda would have been fulfilling Josh and
11 Ted's desires regarding the management of the Ocean Center?

12 A. Oh, yeah. I mean, clearly if -- if Ted would have
13 become the chair and -- there would have been changes with
14 that -- with that Ocean Center. I mean, I doubt Don -- Don
15 Poor wouldn't be in charge of it, and it would -- it
16 would -- it would be run totally differently if things had
17 gone their way.

18 Q. Were you ever aware of an effort by Josh and some
19 others working with them, to take Ticketmaster out of that
20 loop and handle the ticket sales locally?

21 A. No. Hum-um.

22 Q. Okay. Have you got any other words of wisdom
23 you'd like to impart into the record?

24 A. No.

25 Q. Well, I think -- I think I'm done then. Are you

1 here on subpoena?

2 A. No.

3 Q. I want the record to show that you're cooperating
4 and volunteering.

5 A. Sure. Any time. Let me know if you need
6 anything.

7 Q. Well, I may -- these conversations -- things come
8 up and I may --

9 A. Oh, sure. Sure. It's hard to think of every --
10 of everything.

11 Q. Okay. Well -- but I appreciate it.

12 A. Thank you.

13 (WHEREUPON, the interview was concluded.)
14
15
16
17
18
19
20
21
22
23
24
25

CERTIFICATE OF REPORTER OATH

STATE OF FLORIDA)

COUNTY OF VOLUSIA)

I, Shannon Green, Registered Professional Reporter, the undersigned authority certify that Carl Persis named herein personally appeared before me and was duly sworn on the 17th day of February, 2014.

WITNESS my hand and official seal this 23rd day of February, 2014.

Shannon Green
Registered Professional Reporter
Notary Public - State of Florida
My Commission No. EE852120
My Commission Expires 1-8-2017

1 CERTIFICATE OF REPORTER

2
3 STATE OF FLORIDA)4 COUNTY OF VOLUSIA)
5

6 I, Shannon Green, Registered Professional
7 Reporter, certify that I was authorized to and did
8 stenographically report the foregoing proceedings;
9 that a review of the transcript was requested, and
10 that the transcript is a true and complete record of
11 my stenographic notes.

12 I FURTHER CERTIFY that I am not a
13 relative, employee, attorney or counsel of any of
14 the parties, nor am I a relative or employee of any
15 of the parties' attorney or counsel connected with
16 the action, nor am I financially interested in this
17 action.

18 Dated this 23rd day of February, 2014.
19
20
21

22 _____
23 Shannon Green
24 Registered Professional Reporter
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

ERRATA SHEET

INTERVIEW OF: CARL PERSIS

ERRATA

PAGE	LINE	CORRECTION
------	------	------------

_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____

Under penalties of perjury, I declare that I have
read the foregoing document and that the facts
in it are true.

_____	_____
-------	-------