

IN THE COURT OF COMMON PLEAS OF
YORK COUNTY, PENNSYLVANIA

STEPHEN BEAVER,) Civil Action - Law
LEAH COOPER, AMY ELLIOTT,) No. 2024-SU-001322
JOHN ELLIOTT, JEFF HARMON,)
TARA HIGH, KATHERINE JAN)
JARRETT, JESSE SAYRE, AND)
JANE VIVIER,)

Plaintiffs)

VS)

BOARD OF SCHOOL DIRECTORS)
OF THE WEST SHORE SCHOOL)
DISTRICT, HEIDI THOMAS,)
KELLY BRENT, DAVID)
BRINTON, BRENDA COX, AND)
MANDY DAVIS,)

Defendants)

--oOo--

DEPONENT: Heidi Thomas

TAKEN BY: Plaintiffs

DATE: Wednesday, February 19, 2025

TIME: 9:27 a.m.

PLACE: Ream, Carr, Markey, Woloshin &
Hunter, LLP
119 East Market Street
York, Pennsylvania

REPORTER: Angela Kilby
Court Reporter, Notary Public

1300 Garrison Drive, York, PA 17404
(717) 764-7801

1 APPEARANCES:

2

3 REAM, CARR, MARKEY, WOLOSHIN & HUNTER, LLP
4 BY: JOHN N. ELLIOTT, ESQUIRE
5 119 East Market Street
6 York, PA 17401
7 717.843.8968
8 jnellottesq@comcast.net

9 Counsel for Plaintiffs

10

11 COHEN SEGLIAS PALLAS GREENHALL & FURMAN, PC
12 BY: JOSHUA D. BONN, ESQUIRE
13 240 North Third Street, 7th Floor
14 Harrisburg, PA 17101
15 717.480.5304
16 jbonn@cohenseglias.com

17 Counsel for Defendants

18

19

20 ALSO PRESENT:

21 Jeff Harmon

22

23

24

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

INDEX TO DEPONENT

EXAMINATION	PAGE
By Mr. Elliott	4, 98
By Mr. Bonn	90

INDEX TO EXHIBITS

THOMAS EXHIBIT	PAGE
1: E-mail exchange Re: Yet another e-mail is required!	
Bates WSSD_000045 through WSSD_000046	88

It is hereby stipulated and agreed by and between counsel for the respective parties that the deposition is being taken for discovery; that reading, signing, sealing, certification, and filing are waived; that all objections, except as to the form of the question, are reserved to the time of trial.

HEIDI THOMAS,
called upon by Plaintiffs to give testimony, being
duly sworn or affirmed by me, testified as follows:

EXAMINATION

BY MR. ELLIOTT:

Q. Ms. Thomas, my name is John Elliott, I represent the Plaintiffs in this matter. We are here for your deposition.

Could you please state your name and address for the record?

A. Heidi Thomas, 2020 York Haven Road,
Etters, Pennsylvania 17319.

Q. Have you ever given a deposition before?

A. Never.

1 Q. Okay. I'll briefly go through the
2 ground rules of the deposition and you can let
3 me know if you have any questions.

4 Obviously you have been placed under
5 oath, which means you are subject to the
6 penalties of perjury, just as though we were in
7 court.

8 Your duty is to tell the truth to the
9 best of your recollection, and I need to ask you
10 questions that you are able to hear and
11 understand. If at any time you don't hear or
12 understand a question, please ask me to repeat
13 or rephrase it.

14 A. Okay.

15 Q. Otherwise, if you answer a question,
16 we'll presume that you have heard and understood
17 the question. Okay?

18 A. Okay.

19 Q. Do you understand that?

20 A. Yes.

21 Q. The court reporter is making a written
22 transcript of the questions and answers that are
23 being posed today. So, all of your responses
24 will need to be verbal, because she can't take
25 down nods of the head --

1 A. Okay.

2 Q. -- and gestures and so forth.

3 If at any time you need to take break
4 or consult with your attorney, that's fine.
5 Just let us know. Otherwise, I think -- did you
6 attend any of the previous depositions in this
7 case?

8 A. Mrs. Davis' I was here for.

9 Q. So, this will operate in basically the
10 same fashion.

11 A. Okay.

12 Q. What is your educational background?

13 A. I have an associate's degree in
14 nursing. I am a registered nurse.

15 Q. When did you get that degree?

16 A. 2007.

17 Q. Okay. And are you currently employed?

18 A. I am.

19 Q. How are you employed?

20 A. I work for Phillips BioTel as a nurse
21 educator since 2016. And I am employed at UPMC
22 in a surgery center.

23 Q. Has that also been since 2016?

24 A. No. Recent.

25 Q. What -- I'm sorry, when did you say

1 you got your degree?

2 A. 2007. It was when I graduated from
3 Harrisburg Area Community College.

4 Q. Between 2007 and 2016, what is your
5 employment history?

6 A. I worked as a cardiac nurse for -- I
7 worked while going through school for the -- it
8 was Harrisburg Hospital then, Pinnacle Health,
9 in the cardiothoracic post-op floor.

10 Before I was a nurse, I drove school
11 bus for 10 years and worked in the cafeteria for
12 the West Shore School District.

13 And then I worked for a couple years
14 with Grandview Surgery Center and over at Holy
15 Spirit and Geisinger, mainly in surgery.

16 Q. Okay. When were you elected to the
17 school board?

18 A. 2021, I think.

19 Q. Prior to that time, did you have any
20 prior experience serving on any municipal or
21 government boards or agencies?

22 A. I was on the Lewisberry Borough
23 council for, I think, four years.

24 Q. Okay. Do you remember what time
25 period that was?

1 A. I don't.

2 Q. Okay. Have you ever had any training
3 related to the Sunshine Act or right-to-know
4 law?

5 A. Yes. When I first started as a school
6 director, Pennsylvania School Board Association
7 does a training that is mandatory. I think you
8 do that, like, within the first 30 to 60 days of
9 your election. I think you have a time frame.
10 And then you review it again. I had served a
11 two-year term, then got re-elected for a
12 four-year term.

13 So, I think I had training -- I don't
14 recall -- I think they always do an overview --
15 PSBA always does an overview, then Stock and
16 Leader did one in January, I think, of 2024, I
17 think.

18 Q. The PSBA, was that in person or was it
19 online?

20 A. Online. Online. It was during COVID.
21 So, there was nothing in person.

22 Q. What about -- I think -- was Stock and
23 Leader, was that done -- how was that performed?
24 Was that an in person or --

25 A. Yes. They came to present to us in

1 executive session sometime in January after
2 there was a pretty big change in the new board,
3 because they had such a high volume of new
4 people elected. So, Stock and Leader did one in
5 January, I believe, 2024.

6 Q. And around that time, January '24,
7 there was the idea of a request for proposal for
8 legal services was raised.

9 Do you recall that?

10 A. In the board meeting?

11 Q. Correct.

12 A. Mm-hmm. Yes, I do.

13 Q. What prompted the desire to send out
14 an RFP?

15 A. I don't remember the exact wording as
16 to why that was done. In my opinion, Mrs. Say
17 at Stock and Leader was there for, I think, 13
18 years and an RFP had not been done, so it was
19 just made of the decision to do an RFP and
20 changing of solicitor.

21 Q. Okay. Did you have any particular
22 reason that you wanted to change the solicitor
23 at that time?

24 A. Mrs. Say -- Ms. Say did not -- there
25 was some instances that I really felt like Mrs.

1 Say was not listening to the majority of the
2 board and her role -- Dr. Stoltz had always said
3 in the years I had been on, I had heard that,
4 you know, the solicitor serves at the pleasure
5 of the board. And there was a pretty defining
6 time that I can recall that Mrs. Say did not
7 represent when we asked her -- do you want to
8 know specifically?

9 Q. Yes, please.

10 A. Mrs. Say -- I had attended -- I would
11 have to -- like, I think it was one of our
12 public board meetings a parent had come forward
13 and had said that she was not allowed to see the
14 curriculum for the Byrnes Health Education. And
15 by our policy, I think it is 105.3 or two,
16 stated that a parent had the right to see that.
17 And the Byrnes Health Education said due to
18 proprietary reasons, they would not allow the
19 parent to see the material that was taking place
20 at Fishing Creek.

21 And it was in a public meeting. There
22 was some conversations that the parent reached
23 out to me and asked me to -- I guess Byrnes had
24 finally come to an agreement to meet with the
25 parent, utilize that time to show the curriculum

1 to the parent. And the parent asked myself and
2 Mrs. Cox to come to the meeting, which I did.
3 And Mr. Gay was there, along with two people
4 from the Byrnes Health Institute.

5 I don't remember how long the meeting
6 was. But at that point the parent raised some
7 very good questions, and I had asked a couple
8 questions because I had concerns that this
9 institute -- I think what the Department of
10 Education says for, like, grade six. So, these
11 are actually grade five -- grade fifth graders.
12 Grade six, they have to have, like, hygiene
13 teaching. And it might be, like, AIDS training,
14 or just the understanding of maybe communicable
15 diseases.

16 So, that was the baseline of what the
17 Department of Education tells the students --
18 tells the district, they have to have that
19 training. They were doing this training to the
20 fifth graders. And the parent had asked for all
21 the material, all the displays to be brought in,
22 and the Byrnes Health did not bring in the
23 mannequins. Apparently they had tampons,
24 razors, a vagina. And they forgot to bring
25 these in, and the parent was pretty upset about

1 it.

2 One of the questions that made me ask
3 a question to the Byrnes' organization was they
4 had -- were teaching 10- and 11-year-old
5 students that you could live without your
6 reproductive organs. That was the only organ
7 that you could live without. And I asked them
8 -- I asked the female, I don't recall her name,
9 what that had to do with the regulations for the
10 Department of Education for cleanliness and AIDS
11 training. And the meeting was -- it was a good
12 meeting, but the parent was pretty upset about
13 some things.

14 I had asked a question, Mrs. Cox had
15 asked some questions. I don't recall what her
16 questions were. But when we left there, Mr. --
17 or Dr. Stoltz then said in a public meeting that
18 we lacked decorum and caused a lot of -- what's
19 the word? Just, like, a lot of unrest in the
20 town, in the community. He said we lacked
21 decorum.

22 And we asked Mrs. Say when Dr. Stoltz
23 told us in executive session he was going
24 forward with this statement -- which Dr. Stoltz
25 was never present in that meeting, Mr. Gay was

1 along with the two parents, the principal from
2 Fishing Creek, Mrs. Cox, myself, and Mr. Gay.

3 And I said, Todd, you weren't even
4 there, we don't want you to say that. And I
5 looked at Mrs. Say and I was, like, we don't
6 want him to say that. Like, he was not present.
7 He is kind of talking out of turn and basically
8 throwing myself and Mrs. Cox out with any
9 content of the conversation that happened in a
10 room smaller than this with these people.

11 And she kind of said -- I don't know
12 the exact words, but it was, like, well, it is
13 what it is, kind of.

14 And at that point there was -- I did
15 not really have a relationship with her, being
16 on the board for two years. I was on prior and
17 really had very little in conversations with
18 her, just small talk.

19 So, after that, we really decided --
20 you know, I talked to Kelly, and I just said I
21 think we need to have this -- get an RFP out to
22 get a new solicitor, because I didn't think she
23 was listening to us.

24 Q. Why do you think it was the
25 solicitor's job to tell Dr. Stoltz that he

1 wasn't allowed to make a public comment?

2 A. I believe that she serves at the
3 pleasure of the board. The majority was telling
4 her no. Dr. Stoltz was never in that meeting,
5 and I felt it was just causing more unrest and
6 division in the board.

7 Q. In -- you weren't present when Mr.
8 Guistwhite gave his deposition, were you?

9 A. I was not.

10 Q. Did you get a chance to read the
11 transcript of his deposition?

12 A. No, sir.

13 Q. The topic of the Byrnes Group meeting
14 came up. And he testified that Dr. Stoltz was
15 essentially trying to do damage control and get
16 Byrnes to essentially come back to the table
17 because they had refused to work with the
18 district.

19 Do you recall that?

20 A. I can't think for -- Brian had a
21 different relationship than I do with Dr.
22 Stoltz. There was never an MOU for Byrnes. We
23 had found out there had never been an MOU
24 issued. I think Dr. Jamie Whye had contacted
25 them. So, there really was no contract that we

1 were -- what's the word? Like, we weren't
2 really, like, taking them out of a contract that
3 they were in.

4 I think Dr. Stoltz's comments did more
5 damage. And in the summer of 2024, Dr. Stoltz
6 apologized to me and Mrs. Cox for that, because
7 -- he apologized because he realized the
8 division that he kept causing. It was -- he
9 took me aside by myself and apologized for it.

10 Q. Okay. But -- this was all -- you said
11 this was -- this instance with Attorney Say is
12 sort of the impetus of why you thought she was
13 not listening to the majority?

14 A. I think that just brought it more to
15 light, yes.

16 Q. Okay. Were there -- was this the
17 principle instance? Or were there other times
18 where you thought that she was not serving the
19 majority of the board?

20 A. It is the principle, I believe,
21 instance that I can attest to.

22 Q. So, who was responsible for forming
23 the RFP committee?

24 A. I think the board members amongst
25 themselves chose who was going to be on the RFP

1 committee.

2 Q. Did you have any input or
3 participation with the RFP committee?

4 A. No, I did not.

5 Q. Did any of the board members, like,
6 report to you or talk to you about what was
7 going on in those meetings?

8 A. Mrs. Brent did.

9 Q. What did she tell you?

10 A. She had told me how the process was
11 going and just kind of made the comment that she
12 felt they were -- the other board members were
13 kind of stonewalling it and adding more cabinet
14 people from the school district on it and kind
15 of tipping -- if you wanted to say just, like,
16 tipping the scale against to -- Kelly was really
17 trying to do her best in developing it.

18 And I can't really give you the -- I
19 can't really verbalize the icy feeling in an
20 executive session when people don't like other
21 people. It makes it very difficult to have
22 productive conversations. And she just made the
23 statement this is just not being productive. I
24 feel she made the statement that she was, you
25 know, I am just going to -- I don't know her

1 exact words, but she just felt she was being
2 bullied.

3 And the more experienced board
4 members, Mr. Guistwhite and I think it was Mrs.
5 Tierney and Mr. Brinton, I think was on that
6 committee with Mrs. Brent. And I don't think
7 Mr. Brinton had attended a lot. He was having
8 some health issues. She said she just felt kind
9 of on her own little island and ganged up on and
10 didn't have any input into it.

11 Q. So, was there ever any vote or
12 official action by the board to suspend or stop
13 the RFP process?

14 A. I don't believe so.

15 Q. What was your first contact with Kevin
16 Hall?

17 A. I don't recall the exact date.

18 Q. How did it come about?

19 A. Mrs. Brent had given me, I believe,
20 his phone number to contact him, to speak with
21 him.

22 Q. Okay. What did -- when she gave you
23 his number, what did she say about him or why
24 you should be contacting him?

25 A. He was a person of the community, and

1 she felt he would be qualified to lead as a
2 solicitor. So, that is basically some
3 information, factfinding. I don't remember -- I
4 can't grasp, like, the total conversation of
5 everything she said.

6 Her and I talked a lot about different
7 options -- different ideas all the time.

8 Q. Just -- in the Interrogatory responses
9 that you had provided to your attorney who
10 passed it on to me, you indicated that you spoke
11 with Kevin Hall on March 12, April 2, April 3,
12 4, 8, 10, and 11, and that you met with Kevin
13 Hall on April 5.

14 A. Okay.

15 Q. Is that accurate?

16 A. That sounds -- I mean --

17 Q. Does that sound --

18 A. Without looking at, like, a calendar.

19 Q. Right. But at that point you would
20 have looked at either a calendar --

21 A. Yeah.

22 Q. -- or your phone records to be able to
23 confirm that?

24 A. Yeah.

25 Q. So, before Ms. Brent gave you Attorney

1 Hall's phone number, had you ever heard of him
2 or know anything about him?

3 A. I don't really know. I don't recall.

4 Q. Did you -- had you known him
5 personally before that?

6 A. No, hmm-mm.

7 Q. Did anyone other than Ms. Brent
8 recommend him to you as a potential solicitor?

9 A. Not that I can recall.

10 Q. So, then, after you got the phone
11 number, you made a call to Attorney Hall?

12 A. Yes.

13 Q. What did you talk about?

14 A. His qualifications for -- as an
15 attorney, what type of -- just factfinding. I
16 don't really recall 100 percent, you know, the
17 detail, but just factfinding.

18 He told me that he was involved in Boy
19 Scouts in New Cumberland, his children attended,
20 I think, Saint Theresa's. His wife -- small
21 talk. He seemed vested in the community.

22 Q. And what experience did he have with
23 regard to either being a school solicitor or
24 education law?

25 A. I mean, his firm -- I looked at his

1 firm. A lot of times -- I don't think -- I
2 think there is -- what I remember about him --
3 his qualifications, I don't, like, I couldn't
4 tell you off the top of his head (sic). But I
5 know his firm dealt in education law. And I do
6 remember when Mrs. Say -- there was probably
7 four or five, maybe six people that worked from
8 Stock and Leader with the school district. So,
9 it wasn't, like, just one attorney comes in.
10 And Kevin had explained to me they had the
11 resources, as much as what Stock and Leader
12 could do in working for the school district.

13 I don't know all their titles or
14 names. That is just not my expertise.

15 Q. So, you felt his firm had the
16 wherewithal to do this. Did you ever come to
17 the conclusion that Kevin Hall himself was
18 qualified to be the solicitor?

19 A. I believe so.

20 Q. What led you to believe that he had
21 the necessary qualifications to serve in that
22 role?

23 A. He was going to represent to the best
24 of his ability. And I believe his firm, you
25 know, he could attend the meetings and his -- he

1 had back-up, like all law firms have, to -- you
2 know, as a registered nurse, I know that I am
3 just one part of the surgery team. I have an
4 anesthesiologist, I have a doctor, I have a
5 scrub tech, I have an x-ray person. So, all
6 together we all get the job done.

7 So, I felt -- I looked at it from that
8 standpoint, that everybody had different roles
9 that they felt competent, in my opinion.

10 Q. But your understanding would be
11 Attorney Hall would be essentially the main
12 point person, the one attending the meetings,
13 correct?

14 A. Yes.

15 Q. So --

16 A. I think somebody -- I think one time
17 somebody else came in his absence because he was
18 away. And that occasionally would happen with
19 other -- with Mrs. Say, too.

20 Q. Did you confirm whether Kevin Hall
21 though had any prior experience of any kind in
22 either educational law or serving as solicitor?

23 A. Can you say that one more time?

24 Q. Did you -- prior to deciding to go
25 with Kevin Hall and Tucker Arensberg as the new

1 solicitor, did you ever confirm for yourself
2 whether Attorney Hall had any prior experience
3 either as a school solicitor or in education law
4 in any way?

5 A. I think he had that within his scope
6 of practice, scope of being an attorney, was
7 solicitor.

8 Q. Had he represented any other school
9 boards?

10 A. Not that I was aware of.

11 Q. Did you -- when you were talking --
12 you said you discussed qualifications with
13 Attorney Hall. Did you discuss anything else
14 with him with regard to things like policy goals
15 for the school or any other things the board
16 wanted to achieve?

17 A. I don't believe so at that time.

18 Q. Do you -- when you were speaking with
19 Attorney Hall prior to his appointment, did --
20 do you know if he was associated with any
21 political organizations?

22 A. What do you mean by political
23 organization?

24 Q. Any political action committees.

25 A. That I was not aware.

1 Q. Do you know if -- did you speak to him
2 about the Independence Law Center?

3 A. I did not.

4 Q. Did you talk to him about the PA
5 Economic Growth Pack?

6 A. I did not.

7 Q. Did you interview or speak to any
8 other attorneys as a potential solicitor?

9 A. I did not.

10 Q. Why not?

11 A. I felt comfortable with Mr. Hall.

12 Q. Did you -- I think one of the things
13 you said that it had been approximately 13 years
14 since Stock and Leader had been appointed and
15 there had never been an RFP. That was one of
16 the reasons for going forward with an RFP,
17 correct?

18 A. I don't know the exact year. But I
19 kind of think I heard Mr. Guistwhite say before
20 they had done an RFP back then and they just
21 would constantly just renew her contract every
22 May, I think it was.

23 Q. Do you -- what is your understanding
24 of the process that went -- that the board went
25 through to hire Stock and Leader?

1 A. I was not on the board then. I would
2 have no idea.

3 Q. Did you -- what was your understanding
4 about the purpose for an RFP?

5 A. From what I was told, the RFP process,
6 Mr. Guistwhite and Mrs. Tierney, I think they
7 were on the board then. I think they kind of
8 spoke about it. But I don't remember in great
9 detail what they said. It was in the public --
10 maybe in a public meeting they talked about the
11 RFP process from years back.

12 Q. Mm-hmm. And is it your understanding
13 that multiple firms were interviewed and
14 narrowed down to -- based on a set of criteria
15 that the board had developed at that time?

16 A. Mr. Guistwhite might have said that.
17 But I don't recall when, if it would have been,
18 like, when I first was on the school board or if
19 it would have been in 2024. I don't have a
20 close relationship with him and conversating
21 with him.

22 Q. So, why didn't you think it was
23 important to consider or compare other attorneys
24 or firms as a potential solicitor?

25 A. Kelly seemed -- I trusted Kelly. And

1 she said they were -- the RFP process was very
2 laborious and they were kind of ganging up on
3 her and she said can we go about it, you know, a
4 different way. So, I don't have the knowledge
5 of the RFP process. I have never been part of
6 any RFP process, as a nurse, as my time as a
7 school director.

8 Q. Okay. So, was it fair to say then it
9 was Ms. Brent who did not -- who essentially
10 decided that she didn't want to go forward with
11 the RFP process and wanted to select a solicitor
12 by other means?

13 A. I am not pinning it all on her per se.
14 But she was part of the RFP process and she was,
15 like, Heidi, we can't -- this is not working.
16 So, she is a very -- I know she runs her own
17 business. I trusted her as a businesswoman. I
18 trusted her qualifications in making business
19 decisions. So, I put that trust in her.

20 Q. All right. So, Ms. Brent told you
21 that she was confident in Attorney Hall, and
22 that is who she wanted to select as a solicitor?

23 A. I don't agree with that wording
24 totally. I believe she said this would be the
25 best for the school district and us at this time

1 and going forward with Mr. Hall.

2 Q. Okay. And when did she tell you that?

3 A. I don't know the exact date.

4 Q. But you -- your Interrogatory
5 responses indicate you had spoken with Ms. Brent
6 on March 12 concerning Mr. Hall and that you
7 also had a meeting with her and Dr. Stoltz on
8 April 8.

9 Did you have other phone -- either
10 phone or in-person conversations with Ms. Brent
11 about Kevin Hall between March and April?

12 A. I mean, I couldn't tell you
13 specifically which day she -- I was president,
14 she was vice president. So, I leaned on -- we
15 leaned on each other, both being new in the
16 role, as we talked about numerous things.

17 Q. Did you speak with Mandy Davis about
18 -- this is -- my questions here, these are all
19 prior to April 11 and the time leading up to
20 when the official vote happened on the 11th.

21 A. Okay.

22 Q. Did you, during that time, March
23 through April, speak with Mandy Davis about
24 Kevin Hall as a potential solicitor?

25 A. If I did, I just fact finded with her.

1 Q. What do you mean by fact finded?

2 A. Well, so, we get -- part of a school
3 director, we get board notes on Sunday, we get
4 the agenda. And because they were all new in
5 the role, and I had a couple years of
6 experience, I just would say to her, read the
7 board notes, read the agenda. If you have
8 questions, there is, like, a protocol.

9 The school district, I was always told
10 from the beginning, doesn't like surprises. I
11 put that in air quotes because they don't ever
12 want us to have a question for them that they
13 are not prepared for before we walk out to the
14 board meeting. That is, like, a big no-no. And
15 I don't understand it myself.

16 But I -- if I spoke to Mrs. Davis, it
17 was of constant, like, you know, read your board
18 notes, read the agenda. These are the
19 questions. If you have a question about
20 something on the agenda, e-mail the
21 superintendent or e-mail Mr. Gay.

22 So, if I had conversations with Mrs.
23 Davis, it would have been education of -- maybe
24 coddling is not the word, but just kind of
25 encouraging how to find her way in her new role.

1 So, we were always -- I was always told as a new
2 board member, we talk -- we find facts out of
3 our concerns, and then I just would kind of
4 navigate her to tell her, you know, reach out to
5 maybe Dr. Argot, he is a wealth of information
6 with this, or talk to the HR department or the
7 finance department.

8 So, if I spoke to her, it is a lot of
9 information we are presented to -- Mr.
10 Guistwhite, I think, would say it was kind of
11 like drinking out of a firehose. It is a lot to
12 manage when you work and you want to be
13 prepared.

14 So, I did a lot of coaching, maybe,
15 and just kind of factfinding of this is -- if
16 you have a question about this, this is where
17 you need to go to find the answer, to the best
18 of my ability. I did not have a mentor in my
19 role as president, so I was trying to find my
20 way, also, and working.

21 Q. Okay. So, did Mandy Davis ever
22 express to you an opinion about what she thought
23 about Kevin Hall after speaking with him?

24 A. I don't recall. She -- I know she had
25 expressed a frustration to me because the board

1 meetings, even though I felt prepared to lead as
2 the president, there was sometimes that she
3 would say, you know, why didn't you gavel this,
4 or why didn't you -- kind of critiquing me as
5 president.

6 So, we would have conversations of the
7 emotional part of a board meeting, because they
8 were pretty -- the public meetings were pretty
9 volatile. Or maybe volatile is not the right
10 word. I'll take that back. They were not -- I
11 am trying to find the word. They weren't very
12 cohesive, so they didn't flow very well. So, I
13 think she was frustrated also at my ability to,
14 you know, control a meeting. So --

15 Q. Okay. What about, did you ever have
16 any discussions with Brenda Cox about Attorney
17 Hall?

18 A. I don't recall specifically. You
19 know, if I had any conversations with Brenda,
20 they were kind of along the lines of how to be a
21 good -- how to be a successful school director
22 and being proficient in your role. I don't
23 recall -- I can't recall one conversation that
24 was just about Mr. Hall. I apologize.

25 Q. Okay. What about -- same thing with

1 David Brinton. Did you have any discussions
2 with him about Kevin Hall acting as solicitor --
3 or being potentially appointed as the new
4 solicitor?

5 A. I don't recall. I don't speak to him
6 very often.

7 Q. When you met with Ms. Brent and Dr.
8 Stoltz on April 8, I think it was, what did you
9 -- what was discussed at that meeting --

10 A. Umm --

11 Q. -- with regard to Attorney Hall or
12 appointment of the solicitor?

13 A. Just to place it on the agenda. I had
14 agenda building meetings with him. The cabinet
15 comes forth with an agenda. And if there was
16 something that was coming up in -- we just had
17 some -- just, like, the agenda building days,
18 just to place it on the agenda. I don't recall
19 the exact conversation. But just to place it on
20 the agenda.

21 Q. Did you ever tell any of the four
22 board members who voted against the appointment,
23 that would be Adam Trone, Brian Guistwhite,
24 Christopher Kambic, or Abigail Tierney, did you
25 ever tell any of those four that you were

1 speaking to Kevin Hall about potentially hiring
2 him as the solicitor?

3 A. I don't believe so. I called them to
4 tell them I placed it on the agenda -- I was
5 going to place it on the agenda. I called Mr.
6 Kambic, I had a brief conversation. I called
7 Mr. Trone. And I think I left a message for
8 Mrs. Tierney. And Mrs. Tierney and I had, like,
9 an -- not an agreement, but she would call Brian
10 for things, because we did not have an amicable
11 conversation, so she was my go-to.

12 Q. So, what did -- you said you had a
13 conversation with Christopher Kambic. What did
14 you say to him? Or what was discussed with Mr.
15 Kambic?

16 A. I don't exactly remember it. But it
17 was just I was going to place an appointment --
18 or put it on the agenda to hire an attorney -- I
19 don't know the exact wording. He said, okay,
20 thank you, and that was about the conversation.

21 Q. What about Adam Trone? Did you speak
22 to him?

23 A. I did. I told him and he screamed and
24 yelled at me and I told him to have a nice
25 weekend and we hung up.

1 Q. What did you tell him before --

2 A. The same thing. Like, you know, just
3 I was putting this on the agenda RFP -- I don't
4 honestly -- I don't remember the exact wording
5 of it. I apologize. It was a long time ago.

6 Q. So, when did you know Kevin Hall was
7 going to be appointed as the solicitor?

8 A. After we appointed him. It was April
9 11 you told me?

10 Q. Right. That was the meeting.

11 A. That was the meeting. That is when I
12 knew he was going to be appointed, when we
13 appointed him.

14 Q. Before that, you had authorized
15 Attorney Hall to contact Brooke Say though,
16 correct?

17 A. He -- I don't think I said -- I don't
18 think I said, oh, I am authorizing you. He just
19 kind of said to me as a professional courtesy he
20 was going to reach out to her. And I said if
21 you feel that you would like to do that, then do
22 that. But I don't know -- I am not -- I was not
23 there when he contacted Brooke -- or Ms. Say.
24 He just kind of made the statement that he would
25 contact her as a professional courtesy.

1 And I made -- like, is that what
2 happens in lawyer world, you know, people
3 contact each other as a professional courtesy?
4 I don't know. So, he just kind of made that
5 clear to me. And I said if you feel that is
6 what you want to do, then do that. But I didn't
7 authorize him to say what he said. I mean, Mr.
8 Hall is an educated person. How he decided to
9 write the e-mail is how Mr. Hall decided to
10 write the e-mail.

11 Q. All right. I am going to show you
12 what was marked as Brent No. 5. This is an
13 e-mail exchange dated April 5. There is one
14 from Kevin Hall to Brooke Say, then her
15 response. If you could take a moment to look at
16 this and then let me know if you have ever seen
17 this before.

18 A. What was your question?

19 Q. First of all, have you seen these
20 before? Do you recognize --

21 A. With the attorney, yes. Yes.

22 Q. Okay. And in it, Kevin Hall's e-mail
23 on the second page indicates, you know, in
24 addition to the first sentence reaching out as a
25 courtesy to inform you the change in the

1 solicitor will be on the agenda, then says with
2 the goal of making the transition as smooth as
3 possible, we would appreciate it if you could
4 provide a list of the most pressing issues
5 facing the school district and begin preparing
6 transition paperwork for any active matters that
7 you or your firm are currently working on. We
8 do not foresee a need for you to attend the
9 meeting on Thursday. However, if there are any
10 agenda items you feel we should discuss prior to
11 the meeting, please don't hesitate to contact
12 me.

13 You would agree that his e-mail is
14 more than just simply a courtesy saying, you
15 know, this is going to be on the agenda, it
16 says, you know, we need to prepare for the
17 transition as though this is certainly going to
18 happen.

19 Would you agree that is the tone of
20 Mr. Hall's e-mail to Ms. Say?

21 A. I told Mr. Hall we would be putting
22 his -- on the -- April 11 on the agenda. But I
23 did not tell him to add all those sentences.

24 Q. Did you tell him that Ms. Say would
25 not -- did you authorize him to tell Ms. Say

1 that she didn't need to attend the meeting?

2 A. He said it would probably be a
3 courtesy -- professional courtesy, and that was
4 it. Like, I didn't, like, you know, over think
5 of, like, the overreaching arch that we were
6 trying to -- that this appears to be.

7 Mr. Hall signed this letter. I did
8 not. With all due respect, I feel like what he
9 did was Kevin Hall, Mr. Hall's doing, not Heidi
10 Thomas'. I just told him he would be put on the
11 agenda.

12 Q. But you were aware he was going to
13 tell Attorney Say that she didn't need to attend
14 the meeting?

15 A. Correct, yes.

16 Q. In the response e-mail from Brooke Say
17 on the first page -- is there a note you want to
18 write down or --

19 A. No. I guess I am used to writing on
20 paper.

21 Q. She wrote, thank you for the note.
22 This confirms our conversation where you
23 informed me that you and your firm would be
24 appointed at the upcoming board meeting on April
25 11. You informed me that the President Thomas

1 asked you to make this communication about the
2 appointment and that my presence at the meeting
3 was not necessary. In response to my question,
4 you are also advised there had not been a board
5 meeting or executive session where appointment
6 of your firm was discussed.

7 A. Well, she -- am I allowed to talk?

8 Q. Go ahead.

9 A. I just see in her wording that she
10 would be -- that he would be appointed -- Mr.
11 Hall said that he would be on the agenda. So,
12 those are two different -- being on the agenda
13 and being appointed are two different things, in
14 my opinion.

15 Q. It also indicates that there was a
16 conversation between the two of them prior to
17 this e-mail exchange, correct?

18 A. It would appear that way. But I was
19 not party to these e-mails.

20 Q. So, do you know specifically what
21 Kevin Hall verbally told Ms. Say in their
22 conversation that happened prior to this e-mail
23 exchange?

24 A. I would not know that, no, sir.

25 Q. Did you speak to Attorney Say directly

1 to tell her that she did not need to be at the
2 meeting?

3 A. I believe I did. I don't recall when.

4 Q. Did you tell her that she did not need
5 to be at the agenda preparation meeting?

6 A. I did.

7 Q. Why did you tell her that?

8 A. Because Mr. Hall said, you know, it
9 was a professional courtesy. If he was
10 definitely appointed, that maybe that could be
11 upsetting to her to not be employed anymore with
12 the school district -- or her firm, I should
13 say.

14 Q. And -- but you wouldn't have told
15 Attorney Say that unless you were confident that
16 Kevin Hall was going to be appointed that
17 evening?

18 A. I was not confident. I never know
19 what a board is going to poll. I never poll the
20 board. I never have any idea of how people are
21 going to vote.

22 Mr. Hall wrote that e-mail. Mrs. Say
23 -- I said if you don't want -- you know, you
24 don't need to come.

25 I have no -- I guess what I am trying

1 to say is I don't think for Mr. Hall -- and I
2 don't think for Ms. Say. I think just for
3 myself, and I am not being -- what's the word?
4 Like, I am not being smart. I am not being
5 disrespectful when I say that. I truly know I
6 only speak for myself.

7 And I -- even as the president, I
8 don't have any way to manipulate a vote, enforce
9 a vote, in having another school director vote.
10 I was always taught by Mr. Guistwhite and Mrs.
11 Sheri Moyer had always told me to vote your
12 conscience. And I had always instructed the new
13 board members to vote the way that you feel that
14 you -- like Mrs. Moyer said, vote that you had
15 no regrets and that you could always vote your
16 conscience, regardless of what other people were
17 doing. So, I had no idea.

18 Q. Are you suggesting that Attorney Hall
19 overstepped his bounds with his communication to
20 Attorney Say?

21 A. I don't really know how to answer
22 that, because I can't think for him. I don't
23 know, because I don't know how he thinks. I am
24 truly -- if -- if he went over -- I trusted him
25 to do the best. And by saying, you know, for a

1 professional courtesy, and I didn't kind of ask,
2 like, what does a professional courtesy entail.
3 Like, what would you say? I didn't say, oh, I
4 want to see what you are going to say prior to
5 saying that.

6 You know, hindsight is 20/20. We live
7 life learning forward. But we always, you know,
8 understand maybe how it could be perceived. But
9 I don't -- I don't know if I feel comfortable
10 saying he overstepped his bounds because I just
11 don't know what he was thinking.

12 Q. All right. How did the discussion
13 with Attorney Hall talking about him
14 communicating with Attorney Say, how did that
15 come up? Did you contact him to ask him to
16 reach out to Attorney Say?

17 A. When I met with him, he made that
18 discussion with me, that he could reach out to
19 her to be a professional courtesy and I kind of
20 left it at that. I didn't -- I don't
21 micromanage, you know, as a person. So, maybe I
22 should have.

23 Q. So, are you saying that you didn't see
24 Attorney Hall contacting Attorney Say to say you
25 don't need to be at the meeting as an indication

1 that he knew he was going to be appointed?

2 A. Can you say that one more time?

3 Sorry.

4 Q. Do you -- do you see how somebody
5 reading Attorney Hall's e-mail could conclude
6 that he knew he was going to be appointed at
7 that meeting?

8 A. Once again, I don't think for Mr.
9 Hall. I don't understand the context of what
10 was behind it in him saying that. I would not
11 be privy to that.

12 Q. My question was, do you see how a
13 third party looking at that e-mail could
14 conclude that Attorney Hall knew he was going to
15 be appointed that evening?

16 A. I don't see that, no.

17 Q. Despite him saying that he doesn't --
18 not only that he doesn't foresee a need to --
19 for her to attend the meeting, but that she
20 should start transitioning files as of April 5,
21 which is six days before the vote takes place?

22 A. I mean, he just said it would be
23 placed on the agenda. You know, just reading
24 the goal of making a transition as smooth as
25 possible.

1 Q. Exactly. How does he know -- how did
2 he know there was going to be a transition?

3 A. I mean, he just was telling her to put
4 -- it was on the agenda. So, I can't speak for
5 Kevin Hall. I truly I did not write this script
6 for him. I did not write these sentences.

7 Q. All right. But --

8 A. I mean, people can think what they
9 want, you know what I am saying. I don't mean
10 any disrespect.

11 Q. You saw this -- you were aware of and
12 saw this e-mail exchange prior to the April 11
13 vote, correct?

14 A. I believe so.

15 Q. So, you didn't -- you never said, wait
16 a minute, pump the brakes, Kevin Hall, you are
17 overstepping your bounds, you are not supposed
18 to transition yet, this hasn't happened.

19 Did you tell him that -- did you ever
20 tell him or anyone else what he said in his
21 e-mail was inappropriate or incorrect?

22 A. I did not. You know, looking at it
23 now, the way we are going through it with a fine
24 tooth comb, I just knew we put him -- put the
25 potential for the appointment on the 11th.

1 Q. I also want to show you what was
2 marked as Brent No. 6. This was some e-mails
3 that are dated April 3 and April 5. The first
4 one looks like it is from Kevin Hall to you
5 dated April 3, and then there is an e-mail from
6 you to Dr. Stoltz following that.

7 First of all, take a moment to review
8 this and tell me if you recognize these e-mails.

9 A. Okay. I am familiar with these.

10 Q. All right. So, on April 3, Kevin Hall
11 is forwarding to you business agenda items for
12 the upcoming April meeting, correct?

13 A. Okay.

14 Q. So, why is Kevin Hall preparing the
15 agenda item on April 3, eight days before his
16 appointment, if he didn't know that he was going
17 to be the solicitor?

18 A. April 5, you mean? Or --

19 Q. Well, on the first page it looks like
20 that is dated April 3 where he is saying good
21 afternoon, Heidi, please see the attached
22 business agenda items for the upcoming April
23 meeting. That is dated April 3.

24 A. These --

25 MR. BONN: Wait a second. Where is

1 that?

2 MR. ELLIOTT: On the first page at the
3 top, this is WSSD 000001.

4 MR. BONN: Oh, okay. I'm sorry.

5 BY MR. ELLIOTT:

6 Q. Kevin Hall, it says sent time, 4/3/24
7 at 2:20:30 p.m. to your WSSD e-mail. And it
8 says attached -- see attached business items for
9 the upcoming April meeting.

10 A. So, this is just his information, see
11 information about Tucker Arensberg, his
12 information, and the agenda item for the 11th.
13 So, that is no -- I foresee it as it was just a
14 courtesy to provide the information to the other
15 board members of Mr. Hall's qualification and
16 his firm. I didn't have any of that
17 information, so he sent it to me.

18 Q. But did he actually prepare the agenda
19 item that's attached -- that was attached and
20 sent to --

21 A. No. He is just referring to the
22 agenda on the 11th, is how I read it, from what
23 I remember, you know, just asked him to send his
24 qualifications.

25 Q. But the list of attachments includes

1 business agenda items for the 11th, which was --
2 if I recall -- yeah, it was the changing the
3 policy, which would allow you to terminate Stock
4 and Leader without the previous notice
5 provisions and also his appointment.

6 Did he prepare that?

7 A. Well, obviously -- I mean, it appears
8 that he just is presenting information, his
9 information sheet about Tucker Arensberg,
10 information sheet on Mr. Hall, potentially what
11 an engagement letter would look like.

12 Q. Right. Also, the fourth one there is
13 business agenda items for the April 11 meeting.

14 A. Yeah. I just see, like, the -- I
15 don't see, like, the detailed part of each
16 attachment. I don't see the attachment for
17 them.

18 Q. Well, my question is, the e-mail says
19 attached business agenda items, and that is one
20 of the items that is listed.

21 To your recollection, did Attorney
22 Hall prepare that?

23 A. He didn't do the business agenda.

24 Q. Who did?

25 A. Mr. -- Dr. Stoltz and myself. It was

1 the school district. I don't know if his
2 secretary -- like, I don't know, like, how the
3 sausage is made behind the scenes. They just
4 put an agenda together, then I asked Dr. Stoltz
5 to put it on the agenda.

6 Q. Who informed you that the policy
7 change needed to be on the agenda in order to be
8 able to terminate Stock and Leader and hire
9 Tucker Arensberg that evening?

10 A. Umm, I don't really recall, honestly.
11 I don't remember if Kelly and I spoke about it
12 or not.

13 Q. Is that anything you spoke with about
14 Attorney Hall?

15 A. No.

16 Q. Other than saying that he could reach
17 out as a courtesy, did he -- did you discuss any
18 other -- anything else with Kevin Hall about
19 handling the solicitor transition?

20 A. I don't recall.

21 Q. All right. You indicated you did --
22 you also personally told Attorney Say that she
23 did not need to attend either the April 11
24 meeting or the agenda preparation meeting ahead
25 of that, correct?

1 A. I did, yes.

2 Q. All right. What specifically did you
3 tell her?

4 A. I won't need -- I don't remember the
5 exact words. It was fairly short and direct.
6 That we were hope -- going to do an agenda 11
7 item (sic) and I didn't need her to come. I
8 honestly don't recall the exact words. But it
9 was pretty short and to the point.

10 Q. Okay.

11 A. Or direct, I should say.

12 Q. So, but, if you didn't know if Tucker
13 Arensberg was, in fact, going to be appointed,
14 why would she not need to be there?

15 A. I just -- I'll go back to the
16 professional courtesy and what was recommended
17 by Mr. Hall. Other than that, I don't have any
18 other conversation to add to that.

19 Q. So, did it occur to you that then if
20 the vote didn't go through, you wouldn't have a
21 solicitor at that meeting?

22 A. That would be correct.

23 Q. Why would you want that situation?

24 A. Umm, I would figure it out. We would
25 work on figuring out what the next step would

1 be. I mean, I -- I don't really know the
2 question -- the answer to that question. Not
3 everything goes through in a nine-oh, five-four,
4 four-five, seven-three. So, at this point it
5 was a journey going, flowing, and we would cross
6 that bridge when we got there.

7 MR. BONN: Can we take a break?

8 THE WITNESS: I'm sorry, I drank all
9 this water.

10 MR. ELLIOTT: If you need a minute,
11 that is okay.

12 THE WITNESS: I apologize.

13 (A recess was taken from 10:41 a.m.
14 until 10:44 a.m.)

15 BY MR. ELLIOTT:

16 Q. So, the first time that -- to your
17 knowledge, the first time that either Adam
18 Trone, Brian Guistwhite, Christopher Kambic, or
19 Abigail Tierney knew that Kevin Hall was being
20 considered as the solicitor was when it was
21 placed on the agenda for the April 11 meeting,
22 correct?

23 A. Well, I called them to tell them it
24 was going to be on that Friday.

25 Q. All right. So, you called them -- do

1 you remember what day you called them?

2 A. I think Friday.

3 Q. That was April 5?

4 A. I believe I called them.

5 Q. Okay. So, that phone call was the
6 first any of them knew --

7 A. About Kevin Hall, correct.

8 Q. -- about Kevin Hall?

9 A. That's correct.

10 Q. There was any chance of --

11 A. Yes, sir.

12 Q. What was -- it sounded like you said
13 Adam Trone had a fairly strong reaction. What
14 did he say?

15 A. He probably called me a fucking
16 asshole. I don't know. Something absurd.
17 Nothing different than he usually always speaks
18 to me. And I just told him to have a nice
19 weekend and hung up.

20 Q. All right.

21 A. I apologize for --

22 Q. No, it is okay to be accurate. You
23 can have the unvarnished statement.

24 So, you had spoken earlier about there
25 is sort of a chilling effect in some of the

1 meetings and executive sessions. Is that fair
2 to say that not all the members -- board members
3 were getting along well?

4 A. Yes, sir. That would be correct.

5 Q. So, did it -- did you think about how
6 putting this item -- something as fundamental as
7 selecting the solicitor would be, what effect
8 that would have when you put that on the agenda
9 and four of the members had no prior knowledge
10 of that?

11 A. What was your question?

12 Q. Did you think about what kind of
13 effect that would have, putting an item as
14 important as the solicitor on the agenda with
15 four of the members having no prior knowledge
16 that was going to happen?

17 A. Umm, I would make the assumption -- I
18 can't think for Abby, Adam, Brian, or Chris --
19 based on past behaviors that I had observed,
20 Mrs. Tierney, Mr. Kambic, Mr. Guistwhite, and
21 Mr. Trone, had venomous disregard or dislike of
22 me. Maybe venomous is not the word. They just
23 didn't like me.

24 So, in regard to your question, I am
25 kind of thinking -- like, I don't -- I didn't

1 think I could have said that we got a million-
2 dollar grant and there would have been some
3 controversy. Darned if you do, darned if you
4 don't. Like, I felt pretty much pinched
5 in-between that with any of the four board
6 members.

7 I recollect when I was fairly elected,
8 along with Mr. Brinton, Mrs. Davis, Mrs. Cox,
9 and Mr. -- or Mr. -- Mr. and Mrs. Brent, I
10 recall walking into the executive session on a
11 Thursday, election day was Tuesday. Nobody
12 spoke to me. Not one person spoke to me after I
13 had already served two years. And I sat down
14 next to Mr. Butt -- or Dr. Butt and said hello.
15 And the only person that spoke to me after about
16 10 minutes -- because we all sit and we eat and
17 have conversation, then we go over agendas in
18 executive session.

19 Dr. Argot came over and said
20 congratulations, Mrs. Thomas, and I said thank
21 you. Nobody spoke to me. They all stood in a
22 corner, almost as juvenile as middle school is,
23 talking amongst themselves.

24 The second meeting I walked in, the
25 same damn -- the same icy, chilly reception that

1 I had received the week before was the same.
2 Mr. Guistwhite never congratulated me. Mr.
3 Kambic never congratulated me. Mrs. Tierney --
4 Mr. Stoltenburg, Mrs. Moyer, they all went and
5 stood again, from what I recollect. I sat with
6 Dr. Butt again. We talked small talk about our
7 children and about the food that we were eating.
8 And Mrs. Crocenzi did come over and shook my
9 hand and congratulated me and said, you know, I
10 think you'll do a good job. And that was it.

11 So, the answer to your question, I was
12 used to constantly being bullied there. So, it
13 didn't cross my mind to know how Mr. Kambic, Mr.
14 Trone, Mr. Guistwhite, and Mrs. Tierney was
15 going to receive what I did, because they never
16 well received anything I did. So, this was
17 going to be another, you know, target on my
18 back, per se.

19 Did that answer your question?

20 Q. Yeah, I think so. But -- and to
21 follow-up on that. Prior to you informing them
22 of the agenda item though, their understanding
23 would have been that there was an RFP process
24 ongoing that was going to select the next
25 solicitor, right?

1 A. Correct. And Mrs. Brent had stopped
2 that process.

3 Q. Right. Well, she -- my understanding
4 from previous depositions is that Ms. Brent came
5 to the conclusion that she was going to stop
6 that process. I think she told you that.

7 A. Yes.

8 Q. But to your knowledge, did she tell
9 anyone else, either on that committee or anyone
10 else in the board other than you, that the RFP
11 process was not going to go forward?

12 A. I don't -- I don't know if she spoke
13 to anyone else on -- on that fact. I don't
14 know.

15 Q. Prior to April 11, there was never any
16 discussion in a public meeting that the RFP
17 committee was being abandoned or stopped in any
18 way?

19 A. I don't recall that, no.

20 Q. So, after you called the -- those
21 other members to tell them about the agenda item
22 on or about April 5, it was placed on the
23 agenda. And, also, the e-mail exchange between
24 Attorney Say and Attorney Hall was given or
25 shared with all the board members, correct?

1 A. I don't know who else. If they blind
2 copied, I don't know 100 percent the answer.

3 Q. Do you remember discussing with any of
4 the board members the fact that Attorney Hall
5 had apparently contacted Attorney Say and told
6 her that, in effect, he knew he was going to be
7 appointed? Did any of the -- what we call the
8 minority board members, the four who voted
9 against Kevin Hall -- did any of them complain
10 to you or suggest that we are going about this
11 the wrong way, or make any kind of complaint to
12 you?

13 A. Not that I can remember. I think the
14 conversation with Chris was thank you for the
15 information. And Adam Trone just yelled. And I
16 think I left a message for Abby. I don't
17 remember if anybody contacted me after then.

18 Q. All right.

19 A. They could have and I just am not
20 recalling it.

21 Q. All right.

22 A. I apologize.

23 Q. And do you agree that the agenda item
24 and the fact that Tucker Arensberg was going to
25 be an agenda item for the meeting, that became

1 public knowledge and there were -- and the board
2 received electronic communications from members
3 of the public about that subject, correct?

4 A. There was electronic communications
5 for sure. Am I allowed to say through the
6 discovery process about Mrs. Tierney?

7 MR. BONN: Yeah.

8 THE WITNESS: It has come to my
9 knowledge now that through discovery that Mrs.
10 Tierney had tipped off the Northern York County
11 Democratic Club and sent an e-mail to them
12 making the statement, you know, to come to this
13 meeting wear yellow or orange with a flashlight.
14 The assumption that they were assuming was
15 Sunshine Law violation. According -- I don't
16 know if we have that paperwork from Mrs. Tierney
17 making it knowledgeable.

18 MR. BONN: It was turned over in
19 discovery. I don't think I have a copy of it
20 with me.

21 MR. ELLIOTT: If we take a break -- if
22 we are going to talk about it, we may as well
23 refer to that and mark it as an exhibit. If you
24 give me a minute.

25 THE WITNESS: Thank you.

1 MR. ELLIOTT: I think I can track that
2 down.

3 (Discussion off the record.)

4 (The record was read as requested.)

5 BY MR. ELLIOTT:

6 Q. I had asked about the fact that the
7 public being aware this was going to happen at
8 the April 11 meeting. And you -- initially I
9 was asking about the various e-mails, electronic
10 correspondence that came into the board in the
11 couple days leading up to that meeting.

12 And my understanding is those were
13 forwarded to the board, and I was wondering if
14 you had a chance to see those and read them
15 prior to the meeting.

16 A. Yes, sir.

17 Q. Okay. Is there something you wanted
18 to say -- we started talking about an e-mail Ms.
19 Tierney had sent. Was there anything you wanted
20 to say about that in response to this issue?

21 A. Well, I didn't -- I wasn't aware of
22 Mrs. Tierney doing that prior to the meeting.
23 And usually the Wednesday before is when the
24 public sees the agenda.

25 So, usually that Wednesday before a

1 board meeting we'll get numerous e-mails if the
2 public is unhappy about something or they have
3 their opinion, which they rightfully do.

4 So, I am not sure what day they came
5 looking back, but it was just -- I was kind of,
6 like, how is this all happening? There must be
7 somebody telling the public what's going on
8 prior to the public being privy to it.

9 So, that was -- I don't mind the
10 e-mails. I read all of them. It just was a
11 numerous amount of e-mails. And now that I have
12 become aware of Mrs. Tierney tipping off the
13 Northern York Democratic Club, you know,
14 hindsight is, like, oh, so that is why there
15 were so -- it was so well orchestrated. It was
16 almost as if somebody said to a room of 50, here
17 is an e-mail, send it out and flood them, is my
18 opinion.

19 Q. All right. And just -- I'll show you
20 what was marked as Brent No. 7. I think these
21 are the minutes from the April 11 meeting. And
22 after you have had a moment to look at it, would
23 you agree that there is a list -- like, a
24 summary of people who wrote in prior to the
25 meeting and the concerns that they expressed?

1 And those are all listed on -- within the
2 minutes.

3 A. Okay. I looked at that.

4 MR. BONN: Are you ready to answer the
5 question?

6 THE WITNESS: Gosh, I apologize. What
7 was the question again?

8 MR. ELLIOTT: I'll -- whatever it was,
9 I'll ask a new one.

10 BY MR. ELLIOTT:

11 Q. You have had a chance to look over
12 that document?

13 A. Yes.

14 Q. Page 331 through 342, am I correct
15 there is an alphabetical listing of people who
16 shared written comments with the board prior to
17 the April 11 meeting, and each of them indicate
18 that these comments were shared with the board
19 in advance of the meeting?

20 A. Correct.

21 Q. Okay. And then on Page 342 it starts
22 over with the A's. From there forward, those
23 are the people who spoke in person at the
24 meeting, correct?

25 A. Correct.

1 Q. There is a substantial number of ones
2 that indicate that they were shared with the
3 board in advance of the meeting.

4 Were all of those comments forwarded
5 along to you beforehand?

6 A. Yes. Dr. Argot does that, as long as
7 he can verify address is correct and that they
8 are residents of the school district.

9 Q. So, did you -- were you able to read
10 those in advance of the meeting?

11 A. Yes.

12 Q. And is it fair to say that the vast
13 majority of those expressed concern with the
14 manner in which it appeared the solicitor was
15 being selected?

16 A. That was their opinion.

17 Q. Right.

18 A. Correct.

19 Q. Some of them indicated that they
20 thought there might be a violation of the
21 Sunshine Act. Is it fair to say some of those
22 expressed that opinion?

23 A. It appears that is their opinion.

24 Q. Whether you agree with it or not,
25 there were a number of people expressing that

1 opinion, correct?

2 A. That opinion, correct. Their
3 assumption.

4 Q. All right. And at that point some of
5 the other board members had also expressed that
6 same concern, that this might violate the
7 Sunshine Act, correct?

8 A. I honestly didn't go back and read or
9 listen to the meeting to hear their exact words.
10 I don't recall if they said this was a violation
11 of the Sunshine law. If you are making that
12 statement --

13 Q. I am saying prior to the meeting, had
14 any of the -- either in an e-mail or call to you
15 or in executive -- not in executive session.
16 But had anyone expressed -- any of the board
17 members expressed to you that not just they
18 didn't agree with hiring a solicitor, but they
19 thought the way you were going about it violated
20 the Sunshine Act?

21 A. I don't recall them specifically
22 saying that.

23 Q. I think there was an article in the
24 York Dispatch at least a day or two prior to the
25 meeting, I think, along the lines of the e-mail

1 you referenced with regard to Abby Tierney
2 alerting the Democratic Club.

3 Did you happen to see that article
4 prior to the meeting?

5 A. No, sir. I don't subscribe to the
6 York Dispatch.

7 Q. Had you heard about it? Did anybody
8 tell you that there was an article in the paper
9 about the upcoming agenda item?

10 A. I don't recall. I honestly don't
11 recall if they said there was an article. Maybe
12 they did. I don't know. There was always so
13 many moving parts. I don't recall specifically.
14 It wasn't, like, printed out and handed to me.

15 I mean, I had been receiving -- one of
16 the things that became very clear to me when I
17 became president is Mrs. Rhonda Fourhman was
18 very good friends with Mrs. Say. And one of the
19 times I walked out from executive session and
20 Fox 43 was there and it came to my knowledge
21 Mrs. Fourhman's husband worked for Fox 43. And
22 when I asked Ms. Say, I am, like, why is the
23 news here, and she said, oh, I have no idea.
24 Then I found out, you know, after the fact.

25 So, my dad always had a saying, if it

1 smelled like shit, it was always shit. And
2 there was a lot of sneaky things that were
3 happening that I would see from the inside that
4 maybe were, quote on quote, coincidental, but it
5 came out in the end that Mrs. Fourhman was
6 calling Fox 43. Mrs. Fourhman was -- with the
7 connection with her husband working there, we
8 had Fox 43 there. You know, the newspapers were
9 there.

10 I had no idea who was, you know,
11 drumming up this business to come to disrupt the
12 meetings. I can make assumptions.

13 With that type of destined -- maybe,
14 like, their -- I don't think they hate me. Do
15 you know what I am saying? Like, I don't think
16 the other board members hate me. They maybe
17 just don't like me. And I think they were
18 trying to make it as most difficult for me.
19 Looking back, how to make it rougher for me.

20 Certainly nobody rolled out a welcome
21 mat and said this is the best way to run a
22 public meeting. And I was kind of on my own.

23 With that being said, reading those
24 comments, that is their opinion of me. And I
25 cannot think for those people and I can't think

1 for their ideations of why they have such
2 dislike of me. I don't think it is -- I am not
3 taking it personal.

4 Q. Right. Did seeing that volume of
5 public comment beforehand, did any of that give
6 you pause that maybe this wasn't proceeding in
7 the proper fashion?

8 A. I think you could -- no. The answer
9 would be no to that. Because I think you could
10 go back to January, February, March, and
11 probably all the way up to the entire time that
12 I was president that somebody didn't have some
13 comment to say that they didn't like me for what
14 I did.

15 So, we could probably pull up February
16 and there was probably numerous comments. I
17 read them, I digest them, and I move forward to
18 what I felt was on the agenda. And we were
19 going to have open discussion on it. And how it
20 played out, we saw it was a very long meeting.
21 And here we sit getting deposed -- you know,
22 getting my deposition for this.

23 Q. Prior to taking the vote at the April
24 11 meeting, did you receive any information or
25 have any concern that the way you were going

1 about this violated the Sunshine Act?

2 A. No. No, sir. Because we didn't
3 deliberate. We deliberated in that public
4 meeting.

5 Q. So, are you saying other than the --
6 putting aside the electronic comments that came
7 in, no one else told you that there could be
8 potential problem with the Sunshine Act in the
9 way this was --

10 A. Not in the way I knew it, no, sir. I
11 believe you would have to have a separate
12 meeting and meet outside of a regular meeting.
13 We never did that. We, meaning Mrs. Cox, Mrs.
14 Davis, Mr. Brinton, Mrs. Brent, and myself.

15 Q. All right. Is that the only way that
16 the Sunshine Act could have been violated, is --
17 in your mind is if you had an actual meeting
18 outside of the public meeting?

19 A. Correct.

20 Q. What about if board members confirmed
21 how they were going to vote in a phone call?
22 Would that violate the Sunshine Act to your
23 knowledge?

24 A. If they decided that and told me that.
25 I would never ask them that. I have never asked

1 them that. I don't think -- according to what I
2 know of the Sunshine law, you do not poll -- as
3 the president, you don't poll them how they are
4 going to vote. That would be a violation.

5 Mrs. Say, I believe, in that training
6 -- obviously we are allowed to talk to each
7 other and fact find. But never say, oh, you
8 know, how are you going to vote on that. You
9 know, I am just calling you for information, do
10 you have any questions.

11 Like I said, I have always told the
12 board members -- the newer board members,
13 because we were not, in my opinion, a welcome
14 mat, it was very icy. When the new majority
15 came on, I would just encourage them to have a
16 conversation with Dr. Stoltz, look at the
17 agenda, go through the attachments, reach out to
18 the administration, read the board notes. And I
19 felt it was important that if they did ask a
20 question to Dr. Stoltz, it was better in an
21 e-mail format so that Dr. Stoltz could have an
22 answer.

23 If that question was asked in public,
24 like I said, I was told from the beginning of my
25 time there that no surprises -- I am putting it

1 in quotes -- Mrs. Moyer would say. And in the
2 beginning of my tenure there, I kind of found --
3 that was to me, I was, like, that seems a little
4 bit underhanded. I think the public should know
5 or try to make sure that Dr. Stoltz looks
6 prepared, you know, which he generally is.

7 So, I never asked anybody their vote.
8 I always did what Mr. Guistwhite and Mrs. Moyer
9 told me in the beginning, vote your conscience
10 and know that your vote is not always going to
11 be popular, but do what you feel is best.

12 Q. Okay. So, you didn't poll. But did
13 you have an idea of the reaction that the other
14 members who spoke to Kevin Hall had with him?

15 A. I would not be privy to their
16 conversations with him.

17 Q. Did any of them -- did any of them
18 tell you that they had a positive impression of
19 Kevin Hall?

20 A. I never asked that question.

21 Q. Well, I didn't ask that. Did any of
22 them tell you that, whether it was unsolicited?

23 A. No, no.

24 Q. You said you --

25 A. Not that I recall.

1 Q. You said though that you were going
2 forward with this, with sort of not going
3 through the RFP and putting Kevin Hall on the
4 agenda because you trusted Kelly Brent.

5 Was that your testimony?

6 A. Yes, sir.

7 Q. So, you were at least aware that she
8 was in favor of and trusted that Kevin Hall
9 would be a good solicitor?

10 A. I trusted Kelly to know that, yeah.

11 Q. All right. Do you know if Kelly Brent
12 had any similar conversations with any of the
13 other board members?

14 A. I wouldn't be aware of that, no, sir.

15 Q. But -- and you would not have put this
16 on the agenda if Kelly Brent didn't think that
17 Kevin Hall would be an appropriate solicitor?

18 A. I trusted her.

19 Q. All right. And just to be clear, you
20 don't see an inherent contradiction between
21 saying no action was taken before April 11, but
22 yet Attorney Hall seemed to know that he was
23 going to be appointed and asked, say, to start
24 transitioning files prior to the 11th?

25 A. I was not aware of that conversation

1 in that Mr. Hall implying that I had. I had
2 nothing to do with Mr. Hall's e-mail.

3 Q. Right. But you had seen that e-mail
4 before the 11th, right?

5 A. Yeah.

6 Q. Obviously a lot of the people who were
7 writing in knew about that, also?

8 A. Thank you to Mrs. Tierney.

9 Q. So, to go back to, you know, the
10 saying that if something smells like shit, that
11 is because there is shit, do you understand why
12 people were feeling that and had that opinion?

13 A. They could be entitled to that, yes.

14 Q. So, why -- given that kind of
15 sentiment, why didn't -- why didn't you postpone
16 the vote to allow the other members to interview
17 Kevin Hall, or maybe even suggest other
18 potential solicitors, or revisit the RFP
19 process?

20 Why didn't you -- given all the -- all
21 of this public pushback, why did you proceed
22 with a vote that evening and not postpone it for
23 at least a month?

24 A. Based on what Mrs. Brent had said how
25 the RFP process was going, led me to believe

1 that this was the best way -- best path forward.
2 Because she said it was -- I was not a part of
3 the RFP process, but she said it was just not
4 going anywhere.

5 Q. All right. But even if you didn't use
6 an RFP process, why did you refuse the pleas to
7 consider other potential solicitors?

8 A. I mean, not that what they were saying
9 didn't mean anything to me. We just knew --
10 those folks in my opinion didn't know what was
11 really going on and how the administration was
12 not allowing us to kind of move forward, you
13 know, that they -- the administration had
14 demonstrated in a public meeting that they were
15 willing to throw me under the bus in a public
16 statement, and I am referring to the Byrnes
17 education that Dr. Stoltz had written.

18 You know, the news showing up. You
19 know, the outcry of the people that were coming.
20 Kelly said the RFP process was just not going
21 anywhere. And she just didn't feel -- we have
22 got to move forward, let's put it on the agenda.
23 So, I trusted her to go forward with that.

24 Q. So, even though -- for instance, in
25 Mr. Guistwhite's deposition, he indicated that

1 the RFP was on schedule to be presented as they
2 laid out in the schedule, you didn't trust that?
3 Or did you even get his opinion?

4 A. I didn't even get his opinion. We did
5 not speak.

6 Q. Okay. So, you just took everything
7 that Kelly told you at face value and trusted
8 her?

9 A. Yes, sir.

10 Q. When you voted for -- to appoint Kevin
11 Hall and Tucker Arensberg, did you know what
12 their fees were going to be?

13 A. I believe Mr. Hall had put the fees on
14 this information sheet. I don't recall exactly.
15 But I think Mrs. Brent said they were less than
16 Mrs. Say -- Stock and Leader.

17 Q. Do you know if that -- when you say
18 less, is that, like, an hourly rate or --

19 A. Correct.

20 Q. Do you know if that is, in fact, true?
21 If their hourly rate is less?

22 A. I would have to see both of their
23 information sheets to say that for certain.

24 Q. Did you have any concern that because
25 Kevin Hall did not have any prior experience as

1 a solicitor, that it may take more attorneys
2 than it would Stock and Leader to accomplish the
3 same tasks, or there might be repetition of
4 effort?

5 A. Can you ask that one more time? I
6 apologize.

7 Q. Irrespective of what the hourly rate
8 is for any attorneys, did you have any concerns
9 that there might be either repetition of efforts
10 on behalf of the attorneys because Kevin Hall
11 had no previous experience as a solicitor and he
12 might need help getting up to speed on education
13 law?

14 A. I don't believe so, because they had
15 different people in their practice that would
16 assist. So, I didn't think that was going to be
17 of issue.

18 I am not -- I am not a lawyer, so I
19 don't really know how these things work. But I
20 knew there was a team at Stock and Leader, and I
21 knew Mr. Hall was bringing that same type of
22 team. And I felt based on the information
23 presented, his firm was going to be able to go
24 dollar for dollar and be able to produce the
25 same quality of work for the same quantity, per

1 se.

2 Q. You indicated -- one of the -- you
3 said one of the -- the impetus behind this was
4 Attorney Say was not representing the majority
5 of the board.

6 What gave you confidence that Kevin
7 Hall was going to represent the majority of the
8 board?

9 A. Umm, he appeared to be more objective.
10 And the lawsuit that the school district found
11 themselves in -- I don't know the year, it might
12 have been 2022, against parental rights, there
13 was some things said in executive session --
14 obviously I can't say, but there was some
15 definitely undercurrents of did Mrs. Say really
16 represent the school district well and how that
17 outcome of that lawsuit was.

18 So, that was my history with her.

19 Q. Just before I forget, to be clear,
20 when you are saying the lawsuit, is that
21 referring to a parent who wanted to keep their
22 child out of the Character Strong program?

23 A. Yes.

24 Q. And there was some question about
25 whether they could actually identify a religious

1 reason to justify that? Was that the issue? Or
2 what is your understanding of the issue behind
3 that lawsuit?

4 A. The understanding that -- I want to
5 say it is, like, the Pennsylvania Code gives the
6 right to a parent to opt a child out, and the
7 school district didn't follow evaluate properly,
8 that they were found actually liable for not
9 following the law.

10 The program was a social-emotional
11 program learning. The parent wanted them out.
12 A parent doesn't have to prove what part of,
13 like, a specific sentence from what I
14 understand. There were inconsistencies that
15 were allowed by administration.

16 And I believe one of the meetings, you
17 know, there was the understanding as board
18 members, because we are kind of not in the loop,
19 but out of the loop, per se, we get a legal
20 update. And it seemed, like, yeah, we are going
21 to win this. Then the next meeting would come
22 back and Ms. Say would be, like, well, they went
23 through discovery and they found some
24 inconsistencies. And there were some bad things
25 administration did.

1 So, I had that history with Ms. Say
2 and kind of wondering, you know, was she being
3 objective, or was there trying to cover up one
4 of the administration's boo boos.

5 Q. All right. My recollection at one of
6 the public meetings, Mrs. Tierney said that case
7 settled, not there was, like -- not that it went
8 to trial, there was a finding of liability?

9 A. Right.

10 Q. Is that correct?

11 A. I believe it settled and the school
12 district paid the fees for the attorney and
13 something to the families for wrongdoing.

14 Q. Okay. So, how was -- you said
15 Attorney Hall seemed like he was going to be
16 more objective.

17 In what way did you feel he was going
18 to be more objective?

19 A. I felt that he would probably be more
20 forthcoming and keep us out of predicaments like
21 that, where maybe she was more emotionally
22 charged to it, in my opinion, based on my
23 observations of Ms. Say and the Character Strong
24 lawsuit.

25 And then the public statement that she

1 wrote up -- I believe she wrote it up for Dr.
2 Stoltz. And her close relationship with Rhonda
3 Fourhman, with that connection to Fox 43. She
4 didn't seem objective.

5 Q. Are you claiming that Brooke Say wrote
6 the statement that Dr. Stoltz said about with
7 regard to the Byrnes center?

8 A. There was two statements written and
9 Todd -- Dr. Stoltz decided to read one of the
10 two. And I kind of think Ms. Say had written
11 them, or she looked over them. I don't remember
12 the total because there was so much commotion in
13 the executive session when we were leaving.

14 You know, I think I read them, and I
15 was, like, this is bull hooky. This is not what
16 happened. Tell me with the lack of decorum, you
17 weren't even in the meeting. And he is, like, I
18 am doing it, and out he walked.

19 Q. Okay. Did you -- prior to the April
20 11 meeting, did you speak to any members of the
21 public about Kevin Hall or the fact he might be
22 coming up on the agenda to be considered for
23 solicitor?

24 A. I don't recall that I did.

25 Q. Let me show you an e-mail. This was

1 marked as Brent 10 we looked at previously.
2 This is an e-mail exchange between Christopher
3 Kambic and Thaddeus Eisenhower, which there is
4 one that starts on April 8 and there is
5 follow-up on April 10, I believe.

6 Take a minute to look over this, then
7 let me know if you have ever seen this before.

8 A. I have never seen this before.

9 Q. Okay. Were you aware that Mr.
10 Eisenhower had contact with Mr. Kambic prior to
11 the April 11 meeting?

12 A. No.

13 Q. Do you know who Thaddeus Eisenhower
14 is?

15 A. I knew his father and his parents. My
16 mom and dad knew his parents. They owned
17 Gullifty's Restaurant, and they did church
18 things. I have heard of Thad. I couldn't pick
19 him up out of a line-up.

20 Q. Okay.

21 A. I don't -- do you want me to read
22 this?

23 Q. No, you don't have to read anything.
24 My --

25 A. This is interesting.

1 Q. So, do you have any idea how Mr.
2 Eisenhower found out that Kevin Hall was being
3 considered as the solicitor, or any of the
4 background information he seems to have on Mr.
5 Hall?

6 A. Does it spell it out here? I have no
7 clue.

8 Q. I am just wondering, he mentioned --
9 you know, there is mention in here about him
10 talking about Mr. Hall's background in the
11 community. I am just wondering if you know how
12 he came about that information prior to the --

13 A. I have no idea. No idea, sir.

14 Q. All right. Next I'll show you what we
15 marked as Brent 11. This is an excerpt from the
16 answer and new matter that the district filed to
17 the complaint.

18 Did you participate in forming the
19 response to the complaint?

20 A. Did I write this? Is that what you
21 are asking?

22 Q. Not that you wrote it. But did you
23 have input or participate in determining what
24 the response was going to be to the allegations
25 in the complaint?

1 A. I believe that is the lawyer's job to
2 do that. He probably -- I am assuming took our
3 input and made it a legal document. Am I saying
4 that right? I would assume.

5 Q. I am asking you what your
6 understanding of how that came about. So, that
7 is fine.

8 No. 54 specifically says, upon
9 information and belief, plaintiffs Stephen
10 Beaver, Leah Cooper, Amy Elliott, John Elliott,
11 Jeff Harmon, Tara High, Katherine Jan Jarrett,
12 Jesse Sayre, and Jane Vivier have brought this
13 lawsuit for the illegitimate means of imposing
14 their political agenda on the West Shore School
15 District, regardless of how the majority of the
16 duly-elected board members voted.

17 Do you agree with that statement?

18 A. Yes.

19 Q. Why? What is your basis for agreeing
20 with that?

21 A. Well, Ms. High at the primary, I was
22 working the primary at a church on Red Mill. It
23 might be Yocumtown Church of God. It is a
24 polling area.

25 And in my opinion, as I was handing

1 out polling cards, I heard Ms. High say, oh, I
2 am surprised to see you out here in the
3 sunshine, seeing that you are a vampire. And
4 the girl that was sitting to my left said, what
5 did she just say to you? I said, she is
6 accusing me that I am a vampire.

7 Mr. Dan Almone, who is member at
8 large of the Northern York Democratic Club, Mr.
9 Almone, I was walking my dog with my friend who
10 is German and is a dog lover and very interested
11 in other people's dogs, and said to this
12 gentleman walking, who I did not recognize, oh,
13 what a beautiful dog you have, what kind of dog
14 do you have? And the dogs were, you know,
15 tethered apart.

16 And he said I have a GSP, and she says
17 what is a GSP. And, so, they are -- my friend
18 and Mr. Almone -- Dan, I don't know how to
19 pronounce -- Almone, I think. Or Almone. He
20 said, oh, this is his dog and then he looked at
21 me and said, oh, I am surprised you are out here
22 in the sunshine. And I said, excuse me? I
23 don't know you. And he said, oh, you know me.
24 You are a vampire. You don't come out in the
25 sun. And I felt very threatened by that. He

1 did that prior to Mrs. High, so obviously the
2 two of them spoke.

3 There is a new group called United for
4 West Shore that I believe Mr. Marvin Beshore,
5 who had -- I saw his name on this April 11
6 documentation, I saw Sam Andes' name, Lisa
7 Budwig, I believe they are on this United West
8 Shore. I know Mr. -- I know Mr. Harmon is on
9 that group as a treasurer. Joei Askey, her
10 comments are here on this April 11 board. And
11 Mr. Beaver is one of the plaintiffs.

12 Tara High on a lot of the Facebook
13 group has, you know, she was in my region. She
14 ran on a ticket with Mrs. Crocenzi on the
15 Democratic ticket, and I and Mrs. Cox were on
16 the Republican ticket. And we won fairly.

17 These people -- Tara High comes to
18 every meeting. I don't believe she has ever had
19 a conversation with me, as I her, because it
20 doesn't seem like we would have much to talk
21 about.

22 I, in my opinion, feel that those
23 types of behaviors are unbecoming of an adult to
24 accuse me of being a vampire. I think they are
25 inappropriate. And Mr. Almoney ran on the 92nd

1 ticket and lost to Mr. Anderson. And I just was
2 a bit disturbed that being called a vampire for
3 -- because I don't know how to be in the sun.
4 And I was at a polling facility when that
5 happened. So, that is political. I was handing
6 out polling cards, she was working for the
7 Northern York Democratic Party.

8 Q. All right. You agree that Dan Almoney
9 is not a plaintiff in this case? You are aware
10 of that, right?

11 A. Correct. Yes, sir.

12 Q. And you -- obviously you stated Tara
13 High, you have the incident with her. Obviously
14 she has a different political view.

15 How does that translate into the
16 lawsuit itself being brought for illegitimate
17 means?

18 A. Well, it wasn't like she ever shook my
19 hand and said, hey, you ran a great campaign, I
20 am sorry I lost to you. That would be how an
21 adult would handle it, I believe.

22 She was at a polling place. We
23 obviously don't have the same ideology. This is
24 a Northern York Democratic Party formed as a
25 progressive agenda party, which contradicts what

1 my -- what I ran on.

2 Why else would somebody do this,
3 except for trying to derail any type of
4 productive success for my team -- this part --
5 the team that got elected to succeed this year.
6 We have been in the spotlight since this has
7 been brought up. It is going to be an expensive
8 venture.

9 I think it just -- it was a fair win
10 and a fair -- I feel this is based on a couple
11 of those examples I gave you that this was
12 politically motivated because it would be easier
13 just to keep everything dirty and dusty and not
14 allow us to get back to the fundamentals of what
15 the Pennsylvania School Board Association says
16 keeping the children as your No. 1 factor in
17 what we think of. And looking at our poor
18 scores the school district has, we have just not
19 been able to do much of the work that I feel
20 that my constituents wanted me to do.

21 Q. Okay. I think you have expressed how
22 there is -- how Tara High has a different
23 political view than you. Do you have any
24 evidence that the motive of any of the
25 plaintiffs is not actually enforcing the

1 Sunshine Act, but solely to disrupt your
2 political agenda?

3 A. What was your question on that? So --

4 Q. You recognize there is a difference
5 between -- let me back-up.

6 The allegation of the complaint is
7 that the board violated the Sunshine Act. You
8 recognize there is a difference between whether
9 that is ultimately found incorrect versus the
10 reason the suit is brought has nothing to do
11 with the Sunshine Act, but is for some improper
12 purpose.

13 Do you understand the legal
14 distinction between those two things?

15 A. I do to a point. None of these --
16 these people don't come to these meetings to say
17 anything positive. It is always negative. I
18 would make that -- I would stand by that, that
19 we fairly won. Fred Stoltenburg lost, Sheri
20 Moyer lost. She was on this -- she was here on
21 this April 11. So was Tony -- I forget his
22 name. Tony Kapranos. He also lost. Judy
23 Crocenzi was on that, she lost.

24 Those are the facts. They lost their
25 race. Heidi Thomas won, Brenda Cox won, Kelly

1 Brent won, Mandy Davis won, David Brinton won
2 against all of them. And what Mr. Hall said, I
3 had nothing to do with writing that e-mail.
4 There is an allegation. I don't think the
5 allegation is true. We never did go behind
6 closed doors and make a decision prior to going
7 out to that meeting.

8 I never poll the board. I, as
9 president, cannot manipulate and force somebody
10 to do something. In my opinion, it feels as if
11 these people are upset they lost their race and
12 they have done everything to make our first year
13 very unpleasant. And they have succeeded at
14 that.

15 Q. Most of the people you just mentioned
16 are not plaintiffs in this suit. You
17 acknowledge that, correct?

18 A. Correct. But there is another group
19 called United -- would you be able to ask your
20 plaintiff -- your -- your -- Mr. Harmon, who is
21 in this room, would you be able to ask him the
22 name of what the group is called? Because I
23 don't know the name of it. But I recognize the
24 names because I have gotten e-mails from this
25 group, and it is not favorable to the

1 conservative board members.

2 Q. Are you talking about West Shore
3 Unified or United?

4 A. Yes, that is it, sir. Thank you.

5 Q. Are you -- they are not named as a
6 plaintiff, either. You understand, correct?

7 A. Correct.

8 Q. All right. If --

9 A. I believe they all come together,
10 because a lot of these names, Jane, Lisa, Sam,
11 Marvin, those names are on West Shore United
12 that have sent me e-mails one way or another
13 having to do with a separate situation with Adam
14 Trone.

15 Q. Okay. So, how -- let me ask you then,
16 what -- other than disagreeing with you
17 politically, do you have any evidence that any
18 of the plaintiff's motive for this case is
19 specifically for an improper -- is for an
20 improper purpose?

21 A. Why would Mrs. High call me a vampire?

22 Q. Well, if she thought you violated the
23 Sunshine Act, which is the purpose of the
24 lawsuit, why is -- even if she did it in a way
25 that you don't think appropriate for an adult,

1 and, you know, is a bad way to go about it, the
2 allegations are related to violation of the
3 Sunshine Act.

4 What evidence do you have that is not
5 really the purpose of the lawsuit?

6 A. I think it is -- I think it is
7 outreaching tentacles touch, this lawsuit, based
8 on the e-mails, the names. They all have
9 similar fundamentals.

10 I know Mr. Almoney is not part of the
11 lawsuit. But why would Mr. Almoney say the same
12 thing Tara High is saying to me and he is a
13 member at large of the Northern York Democratic
14 Committee? It says on their website.

15 Q. So, is it fair to say then your belief
16 is based because these -- some of these people
17 disagree with you and are members of groups that
18 are politically active, but that is their own
19 possible motivation, is politics?

20 A. That would be correct.

21 Q. Other than that belief, are you aware
22 of any direct evidence that any of the
23 specifically named plaintiffs have brought this
24 case for an improper purpose?

25 A. It would be in my opinion to state,

1 yes, I believe they did bring this for improper
2 violation. I believe the evidence shows if you
3 went back and polled every one of January,
4 February, March, April, May, June, July, August,
5 September, October -- well, we don't have a
6 meeting in July. But you would see some of
7 those names on every public comment and in
8 attendance to every meeting. And that is their
9 right. That is their right. I agree to that.

10 Q. Right. But you seem to be saying that
11 expressing disagreement with your actions or
12 votes as a board member means that there is no
13 other possible motivation somebody could have
14 other than a political motivation to disrupt
15 what you are doing.

16 Is that what you are saying?

17 A. I would agree to that. Yes, sir.

18 Q. And that is the basis of your opinion
19 that --

20 A. Yes, sir.

21 Q. -- it is politically motivated?

22 So, I think maybe you sort of
23 implicitly answered this question.

24 As part of the supplemental discovery
25 we were sent a video of you showing Dan

1 Almoney's Facebook friends list.

2 Do you remember doing that?

3 A. Yes, sir.

4 Q. Okay.

5 A. To the attorney?

6 Q. Right.

7 A. Yes.

8 Q. That was presented to us through
9 discovery. So, just -- I think I can anticipate
10 this. But what is the relation of Dan Almoney's
11 Facebook friends list to this case, if any?

12 A. Because Dan Almoney called me a
13 vampire and said the same -- along the same line
14 that Tara Oberlin High said to me in a political
15 primary setting. And a lot of their friends --
16 his friends coincide with the names that we see
17 on this April 11 or -- Dan has come to the
18 meetings. He was very threatening to me.

19 And I think it is relevant -- like, I
20 just don't understand the value in calling me
21 that. You know, that is derogatory and
22 insulting. I think it is relevant who he
23 associates with, is who adamantly despises me by
24 the derogatory comments that he has stated,
25 along with Ms. High.

1 Q. Other than Ms. High, have any of the
2 other named plaintiffs ever done anything that
3 you would consider insulting or inappropriate
4 behavior toward you?

5 A. I don't really have any interaction
6 with any of those people. I see them -- as
7 president, you kind of look out and see who is
8 sitting there. But those are the two -- two
9 items that I remember being specifically stated
10 to me.

11 MR. ELLIOTT: Why don't we take break
12 for just a minute. I think that might be it. I
13 want to confer with Jeff.

14 (A recess was taken from 12:08 p.m.
15 until 12:12 p.m.)

16 (Thomas Exhibit 1 marked for
17 identification.)

18 BY MR. ELLIOTT:

19 Q. I'll show you what we marked as Thomas
20 1. Take a moment to look at this, then let me
21 know if you recognize it.

22 A. The attorney shared this with me the
23 other day.

24 Q. Is this -- it is the main portion of
25 this is -- it looks like it is an e-mail from

1 Abby Tierney dated April 9, 2024.

2 Is this the e-mail we were talking
3 about earlier in the deposition with regard to,
4 as you described it, Abby sort of tipping off
5 the public?

6 A. Yes, sir.

7 Q. This is the e-mail we were referring
8 to?

9 A. Yes.

10 MR. ELLIOTT: I don't think I have any
11 other questions about it.

12 MR. BONN: Just so you know, John,
13 there was another version of this e-mail that
14 was distributed to the Northern York Democratic
15 Party.

16 MR. ELLIOTT: It looked like this
17 appeared several times within the document.

18 I just wanted to get -- but to the
19 best --

20 MR. BONN: This is the --

21 BY MR. ELLIOTT:

22 Q. To the best of your knowledge, this is
23 at least this is what Ms. Tierney wrote, that
24 this was an accurate copy of the e-mail to the
25 best of your knowledge, right?

1 A. Yes, sir. Can I say something?

2 Q. Sure, go ahead.

3 A. Usually -- if that is on the ninth and
4 the meeting was the 11th, people wouldn't be
5 privy to anything unless a board member told
6 them until the 10th. So --

7 Q. You are indicating for a meeting on
8 the 11th, the agenda would not normally come out
9 until the 10th. Is that what you are saying?

10 A. Yes. For the public to see. So,
11 apparently Mrs. Tierney is our mole that we were
12 looking for, wondering why things were coming
13 out.

14 MR. ELLIOTT: Okay. Did you have any
15 follow-up questions you want to ask?

16 MR. BONN: Yes, I do.

17 EXAMINATION

18 BY MR. BONN:

19 Q. Ms. Thomas, Josh Bonn on behalf of
20 West Shore Board of Directors of the West Shore
21 School District.

22 Didn't you first bring up publicly
23 potential change in the solicitor in the January
24 2024 meeting?

25 A. Yes.

1 Q. And what was that conversation?

2 A. I think it was struck down by the
3 superintendent.

4 Q. What do you mean, it was struck down?
5 There must have been something that was
6 discussed, correct?

7 A. On the agenda, do you mean? To place
8 it on the agenda. We tried to place it on the
9 agenda in January.

10 Q. Yeah. Wasn't there some actual
11 discussion in the public meeting though as an
12 information item?

13 A. Yes. In January there was an
14 information item.

15 Q. Do you remember what that discussion
16 was?

17 A. Not off the top of my head, no.

18 Q. Did the board ever publicly vote to
19 engage in an RFP process?

20 A. I don't know if we voted on it or if
21 it was just an information item the RFP would be
22 put together.

23 Q. Well, if the board had never voted to
24 engage in an RFP process, why would the board
25 vote to stop the RFP process?

1 A. No, we didn't vote on that, no. Now
2 that -- we did not.

3 Q. Do you recall at the April 11 meeting,
4 was there a vote to suspend a board policy?

5 A. I would have to look back at it.

6 Q. Let me ask this. Was there a board
7 policy that somehow obligated the board to
8 engage in an RFP process when hiring a
9 solicitor?

10 A. Say that one more time.

11 Q. Was there a board policy that somehow
12 obligated the board to engage in an RFP process
13 to change its solicitor?

14 A. I don't remember specifically what 005
15 mentioned. But I know that we suspended that on
16 the April 11 meeting, according to these minutes
17 that I am looking at.

18 Q. To your knowledge, that was on the
19 agenda for that meeting?

20 A. Correct.

21 Q. The suspension of the policy?

22 A. Yes, sir, it was.

23 Q. The public was provided an opportunity
24 to provide input before the board made the
25 decision to suspend that policy?

1 A. Yes, sir.

2 Q. Was the public provided with -- let me
3 ask this.

4 Was the potential change in the
5 solicitor on the agenda for the April 11
6 meeting?

7 A. Say that one more time.

8 Q. Was a potential change in the
9 solicitor on the agenda for the April 11
10 meeting?

11 A. Yes, sir, it was.

12 Q. And that agenda was distributed to the
13 public consistent with how the board ordinarily
14 distributes its agenda?

15 A. Yes. Within 24 hours, per the
16 Sunshine law.

17 Q. Did the public have an opportunity to
18 provide public comment before the board voted to
19 appoint Kevin Hall as solicitor?

20 A. Because it was a business item, they
21 did -- excuse me. They did have time to public
22 comment and send in e-mails prior to that
23 meeting.

24 Q. I believe you testified earlier there
25 were actually a number of written e-mails that

1 were submitted to the board prior to the
2 meeting?

3 A. Yes, sir. I could count them. There
4 is numerous.

5 Q. Did you review those before you
6 participated in the vote to change the
7 solicitor?

8 A. Yes, sir, I did.

9 Q. Did you listen to public comment, oral
10 public comment before you voted to change the
11 solicitor?

12 A. Yes. I was present at that meeting
13 and did listen to the public comment.

14 Q. Did the board have any public
15 discussion prior to voting to appoint the
16 solicitor? Or prior to voting to appoint Kevin
17 Hall as solicitor?

18 A. There was a motion made and they have
19 discussion. So, yes, we did have discussion.

20 Q. Do you recall -- did you participate
21 in that discussion?

22 A. I don't believe I said anything
23 because it was probably three or four hours into
24 it. It was -- I was pretty exhausted mentally.

25 Q. Okay.

1 A. And that is very common. If I don't
2 have -- before I vote, you know, some meetings
3 we have discussion and sometimes we don't, and
4 we just vote. That is common.

5 Q. So, if the decision, or if -- strike
6 that.

7 If the public was notified the change
8 in solicitor was going to be on the agenda and
9 the public had an opportunity for public comment
10 and the board deliberated before making the
11 decision to replace the solicitor, do you
12 believe there is any legitimate basis for the
13 Sunshine Act that was brought against the board
14 of directors?

15 A. No, I do not.

16 Q. Did Kelly Brent ever tell you how she
17 was going to vote regarding the change in
18 solicitor?

19 A. No, she did not.

20 Q. Did you ever tell Kelly Brent how you
21 were going to vote regarding the change in
22 solicitor?

23 A. No, I did not.

24 Q. Did you tell any other board members
25 how you were going to vote regarding the change

1 in the solicitor?

2 A. No, I did not.

3 Q. Did any other board members tell you
4 how they were going to vote regarding the change
5 in the solicitor?

6 A. No, they did not.

7 Q. Did you tell Kevin he had five votes?

8 A. I did not.

9 Q. Did you tell Kevin that he was going
10 to be appointed as solicitor at the April 11
11 meeting?

12 A. I did not. I told him he would be on
13 the agenda.

14 Q. Before you became president of the
15 board, was it common for you to first learn of
16 items on the agenda at the time the meeting
17 packet was distributed?

18 A. Correct, yes.

19 Q. How much notice did that give you
20 before the meeting to learn about items that
21 were going to be voted on at the public meeting?

22 A. Sometimes things are placed on there
23 on a Thursday, so that would give us a week.
24 But a lot of times things weren't loaded until
25 that Sunday or Monday. So, you almost had

1 sometimes Monday to read through, say, a
2 contract.

3 Anywhere between seven days to 48
4 hours, it was not uncommon, if things weren't
5 loaded in and they were waiting, you know, for
6 -- I can't speak for how -- before I was
7 president.

8 Q. So, if the other board members did not
9 know that a change in solicitor was going to be
10 on the agenda until you told them approximately
11 a week before the meeting, was that unusual
12 based on your past experience on the board?

13 A. No, it was not.

14 Q. Is it fair to say that whenever you
15 were -- you were president of the board from
16 January 2024 until April 2024, that you had been
17 dissatisfied with Brooke Say's performance as
18 solicitor?

19 A. I would say yes.

20 Q. How difficult is it to perform your
21 duties as president whenever you are
22 dissatisfied with the solicitor?

23 A. It made it fairly impossible. As not
24 an attorney and not knowing how -- there was
25 some matters that happened with other board

1 members, it made it very hard to feel like I had
2 a solid foundation of trust with her. And I
3 think trust is needed in the role that I was
4 serving, due to the fact the past president, Mr.
5 Guistwhite, never spoke to me, or helped me at
6 all as a preceptor in the role.

7 Q. Were you comfortable asking Brooke Say
8 for advice on how to replace Brooke Say?

9 A. No, I was not, at all.

10 MR. BONN: I don't have anything --
11 nothing further.

12 MR. ELLIOTT: Okay. Just briefly.

13 RE-EXAMINATION

14 BY MR. ELLIOTT:

15 Q. I think you indicated during the April
16 11 meeting when the solicitor appointment was
17 discussed, you said it had been a long meeting
18 and you didn't talk much at that point, correct?

19 A. Yes, sir.

20 Q. Do you recall anyone who voted for
21 Kevin Hall describing the basis for their vote,
22 and why they were voting for him?

23 A. I don't recall specifically. I would
24 have to go back and watch the meeting. Like I
25 said, it is not uncommon to not have a

1 discussion. You know, somebody firsts it,
2 seconds it, discussion, and then we poll.

3 I don't recall if anybody -- maybe Ms.
4 Brent did. She sat to my right. She might have
5 said something. But Mrs. Cox didn't sit close
6 to me, nor did -- Mrs. Davis sat to the right of
7 Mrs. Brent. And I think Mr. Brinton sat, like,
8 on -- because we sit in, like, a horseshoe. So,
9 if -- sometimes you are blocked by views. So, I
10 don't recall if they said anything.

11 But that is not uncommon. People
12 don't want to -- if they don't feel inclined,
13 they just want to vote, then it is not mandatory
14 there is a discussion.

15 Q. All right. But you agree that
16 deliberation on the basis for a vote has to take
17 place in a public meeting, correct?

18 A. Say that again, sir.

19 Q. The deliberation for -- about the
20 basis for a vote has to take place at a public
21 meeting?

22 A. Correct. Deliberation, you are saying
23 is the same thing as discussion?

24 Q. Not necessarily.

25 A. Okay.

1 Q. I think there is a legal distinction
2 between the two.

3 Do you have an understanding of
4 whether there is -- let me ask you this way.
5 Based on your knowledge, do you draw any
6 distinction between discussion and deliberation
7 in a meeting?

8 A. I don't think I understand the
9 question. I'm sorry.

10 Q. For purposes of the Sunshine Act,
11 based on the training you have had and your
12 knowledge of it, is there a difference between
13 discussion and deliberation?

14 A. I wouldn't know.

15 MR. ELLIOTT: Okay. That's all I
16 have.

17 (At 12:30 p.m., the deposition
18 concluded.)

19 * * * *

20

21

22

23

24

25

1 County of Lancaster:

2 SS

3 Commonwealth of Pennsylvania:

4

5

6 I, Angela N. Kilby, Reporter, Notary
7 Public, duly commissioned and qualified in and
8 for the County of Lancaster, Commonwealth of
9 Pennsylvania, hereby certify that the
10 deponent/witness came before me, who was duly
11 sworn/affirmed by me to testify to the truth of
12 his/her knowledge concerning the matters in
13 controversy in this cause.

10

11 I also certify that the questions and
12 answers were recorded by me in stenotype, to the
13 best of my ability, and subsequently reduced to
14 computer printout under my supervision, and that
15 this copy is a true and correct record of the
16 same.

14 I further certify that I am not a
15 relative or employee of counsel or the parties
16 hereto. This certification does not apply to
17 any reproduction of the same by any means unless
18 under my direct control and/or supervision.

17

18 Dated this 4th day of March, 2025.

18

19



20

21 Angela N. Kilby - Reporter
22 Notary Public

22

23 Commission Expiration: June 2, 2027

23

24

25

'24 [1] - 9:6	2024 [8] - 8:16, 9:5, 15:5, 24:19, 89:1, 90:24, 97:16 2024-SU-001322 [1] - 1:3 2025 [2] - 1:16, 101:17 2027 [1] - 101:22 24 [1] - 93:15 240 [1] - 2:9 2:20:30 [1] - 43:7	9 9 [1] - 89:1 90 [1] - 3:4 92nd [1] - 79:25 98 [1] - 3:3 9:27 [1] - 1:17	administration [5] - 64:18, 68:11, 68:13, 72:15, 72:25 administration's [1] - 73:4 adult [3] - 79:23, 80:21, 84:25 advance [3] - 57:19, 58:3, 58:10 advice [1] - 98:8 advised [1] - 36:4 affirmed [1] - 4:12 afternoon [1] - 42:21 agencies [1] - 7:21 agenda [71] - 27:4, 27:7, 27:18, 27:20, 30:13, 30:14, 30:15, 30:17, 30:18, 30:20, 31:4, 31:5, 31:18, 32:3, 34:1, 34:10, 34:15, 34:22, 35:11, 36:11, 36:12, 37:5, 40:23, 41:4, 42:11, 42:15, 42:22, 43:12, 43:18, 43:22, 44:1, 44:13, 44:19, 44:23, 45:4, 45:5, 45:7, 45:24, 46:6, 47:21, 49:8, 49:14, 51:22, 52:21, 52:23, 53:23, 53:25, 55:24, 60:9, 62:18, 64:17, 66:4, 66:16, 68:22, 74:22, 77:14, 80:25, 82:2, 90:8, 91:7, 91:8, 91:9, 92:19, 93:5, 93:9, 93:12, 93:14, 95:8, 96:13, 96:16, 97:10 agendas [1] - 50:17 ago [1] - 32:5 agree [12] - 25:23, 34:13, 34:19, 53:23, 56:23, 58:24, 59:18, 77:17, 80:8, 86:9, 86:17, 99:15 agreed [1] - 4:2 agreeing [1] - 77:19 agreement [2] - 10:24, 31:9 ahead [3] - 36:8, 45:24, 90:2 AIDS [2] - 11:13, 12:10 air [1] - 27:11 alerting [1] - 60:2 allegation [3] - 82:6, 83:4, 83:5 allegations [2] - 76:24, 85:2 allow [4] - 10:18, 44:3, 67:16, 81:14
0		A A's [1] - 57:22 a.m [3] - 1:17, 47:13, 47:14 abandoned [1] - 52:17 Abby [5] - 49:18, 53:16, 60:1, 89:1, 89:4 Abigail [2] - 30:24, 47:19 ability [4] - 20:24, 28:18, 29:13, 101:11 able [9] - 5:10, 18:22, 45:8, 58:9, 70:23, 70:24, 81:19, 83:19, 83:21 absence [1] - 21:17 absurd [1] - 48:16 accomplish [1] - 70:2 according [3] - 54:15, 64:1, 92:16 accurate [3] - 18:15, 48:22, 89:24 accuse [1] - 79:24 accusing [1] - 78:6 achieve [1] - 22:16 acknowledge [1] - 83:17 Act [15] - 8:3, 58:21, 59:7, 59:20, 63:1, 63:8, 63:16, 63:22, 82:1, 82:7, 82:11, 84:23, 85:3, 95:13, 100:10 acting [1] - 30:2 action [3] - 17:12, 22:24, 66:21 Action [1] - 1:3 actions [1] - 86:11 active [2] - 34:6, 85:18 actual [2] - 63:17, 91:10 Adam [7] - 30:23, 31:21, 47:17, 48:13, 49:18, 53:15, 84:13 adamantly [1] - 87:23 add [2] - 34:23, 46:18 adding [1] - 16:13 addition [1] - 33:24 address [2] - 4:20, 58:7	67:16, 81:14 allowed [6] - 10:13, 14:1, 36:7, 54:5, 64:6, 72:15 allowing [1] - 68:12 Almoneys [10] - 78:7, 78:9, 78:18, 78:19, 79:25, 80:8, 85:10, 85:11, 87:12 Almoneys's [2] - 87:1, 87:10 almost [3] - 50:22, 56:16, 96:25 alphabetical [1] - 57:15 ALSO [1] - 2:14 amicable [1] - 31:10 amount [1] - 56:11 AMY [1] - 1:3 Amy [1] - 77:10 AND [2] - 1:5, 1:10 Anderson [1] - 80:1 Andes' [1] - 79:6 anesthesiologist [1] - 21:4 Angela [3] - 1:20, 101:6, 101:20 answer [11] - 5:15, 28:17, 38:21, 47:2, 51:11, 51:19, 53:2, 57:4, 62:8, 64:22, 76:16 answered [1] - 86:23 answers [2] - 5:22, 101:11 anticipate [1] - 87:9 apart [1] - 78:15 apologize [7] - 29:24, 32:5, 47:12, 48:21, 53:22, 57:6, 70:6 apologized [3] - 15:6, 15:7, 15:9 appear [1] - 36:18 APPEARANCES [1] - 2:1 appeared [3] - 58:14, 71:9, 89:17 apply [1] - 101:15 appoint [4] - 69:10, 93:19, 94:15, 94:16 appointed [18] - 23:14, 30:3, 32:7, 32:8, 32:12, 32:13, 35:24, 36:10, 36:13, 37:10, 37:16, 40:1, 40:6, 40:15, 46:13, 53:7, 66:23, 96:10 appointment [10] - 22:19, 30:12, 30:22, 31:17, 36:2, 36:5,
000001 [1] - 43:3 005 [1] - 92:14			
1	3 3 [7] - 18:11, 42:3, 42:5, 42:10, 42:15, 42:20, 42:23 30 [1] - 8:8 331 [1] - 57:14 342 [2] - 57:14, 57:21		
1 [4] - 3:8, 81:16, 88:16, 88:20 10 [6] - 7:11, 12:4, 18:12, 50:16, 75:1, 75:5 100 [2] - 19:16, 53:2 105.3 [1] - 10:15 10:41 [1] - 47:13 10:44 [1] - 47:14 10th [2] - 90:6, 90:9 11 [29] - 18:12, 26:19, 32:9, 34:22, 35:25, 41:12, 44:13, 45:23, 46:6, 47:21, 52:15, 55:8, 56:21, 57:17, 62:24, 66:21, 74:20, 75:11, 76:15, 79:5, 79:10, 82:21, 87:17, 92:3, 92:16, 93:5, 93:9, 96:10, 98:16 11-year-old [1] - 12:4 119 [2] - 1:19, 2:4 11th [9] - 26:20, 41:25, 43:12, 43:22, 44:1, 66:24, 67:4, 90:4, 90:8 12 [2] - 18:11, 26:6 12:08 [1] - 88:14 12:12 [1] - 88:15 12:30 [1] - 100:17 13 [2] - 9:17, 23:13 1300 [1] - 1:23 17101 [1] - 2:9 17319 [1] - 4:22 17401 [1] - 2:4 17404 [1] - 1:23 19 [1] - 1:16	4 4 [2] - 3:3, 18:12 4/3/24 [1] - 43:6 43 [5] - 60:20, 60:21, 61:6, 61:8, 74:3 48 [1] - 97:3 4th [1] - 101:17		
	5 5 [8] - 18:13, 33:12, 33:13, 40:20, 42:3, 42:18, 48:3, 52:22 50 [1] - 56:16 54 [1] - 77:8		
	6 6 [1] - 42:2 60 [1] - 8:8		
	7 7 [1] - 56:20 717 [1] - 1:24 717.480.5304 [1] - 2:10 717.843.8968 [1] - 2:5 764-7801 [1] - 1:24 7th [1] - 2:9		
2	8 8 [4] - 18:12, 26:8, 30:8, 75:4 88 [1] - 3:9		
2 [2] - 18:11, 101:22 20/20 [1] - 39:6 2007 [3] - 6:16, 7:2, 7:4 2016 [3] - 6:21, 6:23, 7:4 2020 [1] - 4:21 2021 [1] - 7:18 2022 [1] - 71:12			

41:25, 42:16, 44:5, 98:16 appreciate [1] - 34:3 appropriate [2] - 66:17, 84:25 April [53] - 18:11, 18:13, 26:8, 26:11, 26:19, 26:23, 30:8, 32:8, 33:13, 34:22, 35:24, 40:20, 41:12, 42:3, 42:5, 42:10, 42:12, 42:15, 42:18, 42:20, 42:22, 42:23, 43:9, 44:13, 45:23, 47:21, 48:3, 52:15, 52:22, 55:8, 56:21, 57:17, 62:23, 66:21, 74:19, 75:4, 75:5, 75:11, 79:5, 79:10, 82:21, 86:4, 87:17, 89:1, 92:3, 92:16, 93:5, 93:9, 96:10, 97:16, 98:15 arch [1] - 35:5 Area [1] - 7:3 area [1] - 77:24 Arensberg [7] - 21:25, 43:11, 44:9, 45:9, 46:13, 53:24, 69:11 Argot [3] - 28:5, 50:19, 58:6 article [4] - 59:23, 60:3, 60:8, 60:11 aside [2] - 15:9, 63:6 Askey [1] - 79:9 asshole [1] - 48:16 assist [1] - 70:16 associate's [1] - 6:13 associated [1] - 22:20 associates [1] - 87:23 Association [2] - 8:6, 81:15 assume [1] - 77:4 assuming [2] - 54:14, 77:2 assumption [3] - 49:17, 54:14, 59:3 assumptions [1] - 61:12 attached [6] - 42:21, 43:8, 43:19, 44:19 attachment [2] - 44:16 attachments [2] - 43:25, 64:17 attend [7] - 6:6, 20:25, 34:8, 35:1, 35:13, 40:19, 45:23 attendance [1] - 86:8 attended [3] - 10:10, 17:7, 19:19	attending [1] - 21:12 attest [1] - 15:21 attorney [11] - 6:4, 18:9, 19:15, 20:9, 22:6, 31:18, 33:21, 73:12, 87:5, 88:22, 97:24 Attorney [33] - 15:11, 18:25, 19:11, 21:11, 22:2, 22:13, 22:19, 25:21, 29:16, 30:11, 32:15, 35:13, 36:25, 37:15, 38:18, 38:20, 39:13, 39:14, 39:16, 39:24, 40:5, 40:14, 44:21, 45:14, 45:22, 52:24, 53:4, 53:5, 66:22, 71:4, 73:15 attorneys [5] - 23:8, 24:23, 70:1, 70:8, 70:10 August [1] - 86:4 authorize [2] - 33:7, 34:25 authorized [1] - 32:14 authorizing [1] - 32:18 aware [13] - 22:10, 22:25, 35:12, 41:11, 55:7, 55:21, 56:12, 66:7, 66:14, 66:25, 75:9, 80:9, 85:21	64:24, 65:2, 65:9 behalf [2] - 70:10, 90:19 behavior [1] - 88:4 behaviors [2] - 49:19, 79:23 behind [5] - 40:10, 45:3, 71:3, 72:2, 83:5 belief [3] - 77:9, 85:15, 85:21 Beshore [1] - 79:4 best [14] - 5:9, 16:17, 20:23, 25:25, 28:17, 38:25, 61:21, 65:11, 68:1, 89:19, 89:22, 89:25, 101:11 better [1] - 64:20 between [15] - 4:3, 7:4, 26:11, 36:16, 50:5, 52:23, 66:20, 75:2, 82:5, 82:8, 82:14, 97:3, 100:2, 100:6, 100:12 big [2] - 9:2, 27:14 BioTel [1] - 6:20 bit [2] - 65:4, 80:2 blind [1] - 53:1 blocked [1] - 99:9 board [88] - 7:17, 9:2, 9:10, 10:2, 10:5, 10:12, 13:16, 14:3, 14:6, 15:19, 15:24, 16:5, 16:12, 17:3, 17:12, 22:15, 23:24, 24:1, 24:7, 24:15, 24:18, 27:3, 27:7, 27:14, 27:17, 28:2, 28:25, 29:7, 30:22, 35:24, 36:4, 37:19, 37:20, 38:13, 43:15, 49:2, 50:5, 52:10, 52:25, 53:4, 53:8, 54:1, 55:10, 55:13, 56:1, 57:16, 57:18, 58:3, 59:5, 59:16, 61:16, 63:20, 64:12, 64:18, 66:13, 71:5, 71:8, 72:17, 77:16, 79:10, 82:7, 83:8, 84:1, 86:12, 90:5, 91:18, 91:23, 91:24, 92:4, 92:6, 92:7, 92:11, 92:12, 92:24, 93:13, 93:18, 94:1, 94:14, 95:10, 95:13, 95:24, 96:3, 96:15, 97:8, 97:12, 97:15, 97:25 BOARD [1] - 1:8	Board [3] - 8:6, 81:15, 90:20 boards [2] - 7:21, 22:9 BONN [12] - 2:8, 42:25, 43:4, 47:7, 54:7, 54:18, 57:4, 89:12, 89:20, 90:16, 90:18, 98:10 Bonn [2] - 3:4, 90:19 boo [1] - 73:4 boos [1] - 73:4 Borough [1] - 7:22 bounds [3] - 38:19, 39:10, 41:17 Boy [1] - 19:18 brakes [1] - 41:16 break [4] - 6:3, 47:7, 54:21, 88:11 BRENDA [1] - 1:10 Brenda [3] - 29:16, 29:19, 82:25 Brent [29] - 16:8, 17:6, 17:19, 18:25, 19:7, 25:9, 25:20, 26:5, 26:10, 30:7, 33:12, 42:2, 50:9, 52:1, 52:4, 56:20, 63:14, 66:4, 66:11, 66:16, 67:24, 69:15, 75:1, 76:15, 83:1, 95:16, 95:20, 99:4, 99:7 BRENT [1] - 1:10 Brian [5] - 14:20, 30:23, 31:9, 47:18, 49:18 bridge [1] - 47:6 brief [1] - 31:6 briefly [2] - 5:1, 98:12 bring [4] - 11:22, 11:24, 86:1, 90:22 bringing [1] - 70:21 BRINTON [1] - 1:10 Brinton [7] - 17:5, 17:7, 30:1, 50:8, 63:14, 83:1, 99:7 Brooke [8] - 32:15, 32:23, 33:14, 35:16, 74:5, 97:17, 98:7, 98:8 brought [8] - 11:21, 15:14, 77:12, 80:16, 81:7, 82:10, 85:23, 95:13 Budwig [1] - 79:7 building [2] - 30:14, 30:17 bull [1] - 74:15 bullied [2] - 17:2, 51:12 bus [2] - 7:11, 68:15	business [11] - 25:17, 25:18, 42:11, 42:22, 43:8, 44:1, 44:13, 44:19, 44:23, 61:11, 93:20 businesswoman [1] - 25:17 butt [3] - 50:14, 51:6 BY [12] - 1:15, 2:3, 2:8, 4:15, 43:5, 47:15, 55:5, 57:10, 88:18, 89:21, 90:18, 98:14 Byrnes [10] - 10:14, 10:17, 10:23, 11:4, 11:22, 14:13, 14:16, 14:22, 68:16, 74:7 Byrnes' [1] - 12:3
C				
cabinet [2] - 16:13, 30:14 cafeteria [1] - 7:11 calendar [2] - 18:18, 18:20 campaign [1] - 80:19 cannot [2] - 61:25, 83:9 cardiac [1] - 7:6 cardiothoracic [1] - 7:9 cards [2] - 78:1, 80:6 Carr [1] - 1:18 CARR [1] - 2:3 case [6] - 6:7, 73:6, 80:9, 84:18, 85:24, 87:11 caused [1] - 12:18 causing [2] - 14:5, 15:8 Center [2] - 7:14, 23:2 center [2] - 6:22, 74:7 certain [1] - 69:23 certainly [2] - 34:17, 61:20 certification [2] - 4:6, 101:15 certify [3] - 101:7, 101:10, 101:14 chance [4] - 14:10, 48:10, 55:14, 57:11 change [16] - 9:2, 9:22, 33:25, 45:7, 90:23, 92:13, 93:4, 93:8, 94:6, 94:10, 95:7, 95:17, 95:21, 95:25, 96:4, 97:9 changing [2] - 9:20, 44:2 Character [2] - 71:22,				

73:23 charged [1] - 73:22 child [2] - 71:22, 72:6 children [3] - 19:19, 51:7, 81:16 chilling [1] - 48:25 chilly [1] - 50:25 chose [1] - 15:25 Chris [2] - 49:18, 53:14 Christopher [4] - 30:24, 31:13, 47:18, 75:2 church [2] - 75:17, 77:22 Church [1] - 77:23 Civil [1] - 1:3 claiming [1] - 74:5 cleanliness [1] - 12:10 clear [4] - 33:5, 60:16, 66:19, 71:19 close [3] - 24:20, 74:2, 99:5 closed [1] - 83:6 Club [4] - 54:11, 56:13, 60:2, 78:8 clue [1] - 76:7 coaching [1] - 28:14 coddling [1] - 27:24 Code [1] - 72:5 COHEN [1] - 2:8 cohesive [1] - 29:12 coincide [1] - 87:16 coincidental [1] - 61:4 College [1] - 7:3 comb [1] - 41:24 comfortable [3] - 23:11, 39:9, 98:7 coming [4] - 30:16, 68:19, 74:22, 90:12 comment [11] - 14:1, 16:11, 62:5, 62:13, 86:7, 93:18, 93:22, 94:9, 94:10, 94:13, 95:9 comments [9] - 15:4, 57:16, 57:18, 58:4, 61:24, 62:16, 63:6, 79:10, 87:24 Commission [1] - 101:22 commissioned [1] - 101:6 Committee [1] - 85:14 committee [6] - 15:23, 16:1, 16:3, 17:6, 52:9, 52:17 committees [1] - 22:24 common [3] - 95:1,	95:4, 96:15 COMMON [1] - 1:1 Commonwealth [2] - 101:3, 101:7 commotion [1] - 74:12 communicable [1] - 11:14 communicating [1] - 39:14 communication [2] - 36:1, 38:19 communications [2] - 54:2, 54:4 community [4] - 12:20, 17:25, 19:21, 76:11 Community [1] - 7:3 compare [1] - 24:23 competent [1] - 21:9 complain [1] - 53:9 complaint [5] - 53:11, 76:17, 76:19, 76:25, 82:6 computer [1] - 101:12 concern [4] - 58:13, 59:6, 62:25, 69:24 concerning [2] - 26:6, 101:9 concerns [4] - 11:8, 28:3, 56:25, 70:8 conclude [2] - 40:5, 40:14 concluded [1] - 100:18 conclusion [2] - 20:17, 52:5 confer [1] - 88:13 confidence [1] - 71:6 confident [3] - 25:21, 37:15, 37:18 confirm [3] - 18:23, 21:20, 22:1 confirmed [1] - 63:20 confirms [1] - 35:22 congratulated [3] - 51:2, 51:3, 51:9 congratulations [1] - 50:20 connection [2] - 61:7, 74:3 conscience [3] - 38:12, 38:16, 65:9 conservative [1] - 84:1 consider [3] - 24:23, 68:7, 88:3 considered [3] - 47:20, 74:22, 76:3 consistent [1] - 93:13 constant [1] - 27:17	constantly [2] - 23:21, 51:12 constituents [1] - 81:20 consult [1] - 6:4 contact [8] - 17:15, 17:20, 32:15, 32:25, 33:3, 34:11, 39:15, 75:10 contacted [4] - 14:24, 32:23, 53:5, 53:17 contacting [2] - 17:24, 39:24 content [1] - 13:9 context [1] - 40:9 contract [4] - 14:25, 15:2, 23:21, 97:2 contradiction [1] - 66:20 contradicts [1] - 80:25 control [3] - 14:15, 29:14, 101:16 controversy [2] - 50:3, 101:9 conversating [1] - 24:20 conversation [18] - 13:9, 18:4, 29:23, 30:19, 31:6, 31:11, 31:13, 31:20, 35:22, 36:16, 36:22, 46:18, 50:17, 53:14, 64:16, 66:25, 79:19, 91:1 conversations [9] - 10:22, 13:17, 16:22, 26:10, 27:22, 29:6, 29:19, 65:16, 66:12 COOPER [1] - 1:3 Cooper [1] - 77:10 copied [1] - 53:2 copy [3] - 54:19, 89:24, 101:12 corner [1] - 50:22 correct [42] - 9:11, 21:13, 23:17, 32:16, 35:15, 36:17, 41:13, 42:12, 45:25, 46:22, 47:22, 48:7, 48:9, 49:4, 52:1, 52:25, 54:3, 57:14, 57:20, 57:24, 57:25, 58:7, 58:18, 59:1, 59:2, 59:7, 63:19, 69:19, 73:10, 80:11, 83:17, 83:18, 84:6, 84:7, 85:20, 91:6, 92:20, 96:18, 98:18, 99:17, 99:22, 101:12 correspondence [1] - 55:10	council [1] - 7:23 counsel [2] - 4:3, 101:14 Counsel [2] - 2:6, 2:11 count [1] - 94:3 County [3] - 54:10, 101:1, 101:7 COUNTY [1] - 1:1 couple [5] - 7:13, 11:7, 27:5, 55:11, 81:10 COURT [1] - 1:1 court [2] - 5:7, 5:21 Court [1] - 1:21 courtesy [14] - 32:19, 32:25, 33:3, 33:25, 34:14, 35:3, 37:9, 39:1, 39:2, 39:19, 43:14, 45:17, 46:16 cover [1] - 73:3 COVID [1] - 8:20 Cox [11] - 11:2, 12:14, 13:2, 13:8, 15:6, 29:16, 50:8, 63:13, 79:15, 82:25, 99:5 COX [1] - 1:10 Creek [2] - 10:20, 13:2 criteria [1] - 24:14 critiquing [1] - 29:4 Crocenzi [3] - 51:8, 79:14, 82:23 cross [2] - 47:5, 51:13 Cumberland [1] - 19:19 curriculum [2] - 10:14, 10:25	days [6] - 8:8, 30:17, 40:21, 42:15, 55:11, 97:3 dealt [1] - 20:5 decided [6] - 13:19, 25:10, 33:8, 33:9, 63:24, 74:9 deciding [1] - 21:24 decision [5] - 9:19, 83:6, 92:25, 95:5, 95:11 decisions [1] - 25:19 decorum [3] - 12:18, 12:21, 74:16 Defendants [2] - 1:12, 2:11 defining [1] - 10:5 definitely [2] - 37:10, 71:15 degree [3] - 6:13, 6:15, 7:1 deliberate [1] - 63:3 deliberated [2] - 63:3, 95:10 deliberation [5] - 99:16, 99:19, 99:22, 100:6, 100:13 Democratic [9] - 54:11, 56:13, 60:2, 78:8, 79:15, 80:7, 80:24, 85:13, 89:14 demonstrated [1] - 68:14 department [2] - 28:6, 28:7 Department [3] - 11:9, 11:17, 12:10 DEPONENT [2] - 1:14, 3:1 deponent/witness [1] - 101:8 deposed [1] - 62:21 deposition [10] - 4:4, 4:18, 4:23, 5:2, 14:8, 14:11, 62:22, 68:25, 89:3, 100:17 depositions [2] - 6:6, 52:4 derail [1] - 81:3 derogatory [2] - 87:21, 87:24 described [1] - 89:4 describing [1] - 98:21 desire [1] - 9:13 despises [1] - 87:23 despite [1] - 40:17 destained [1] - 61:13 detail [2] - 19:17, 24:9 detailed [1] - 44:15 determining [1] -
D				
dad [2] - 60:25, 75:16 damage [2] - 14:15, 15:5 damn [1] - 50:25 Dan [7] - 78:7, 78:18, 80:8, 86:25, 87:10, 87:12, 87:17 darned [2] - 50:3 date [2] - 17:17, 26:3 DATE [1] - 1:16 dated [7] - 33:13, 42:3, 42:5, 42:20, 42:23, 89:1, 101:17 DAVID [1] - 1:10 David [2] - 30:1, 83:1 DAVIS [1] - 1:11 Davis [9] - 26:17, 26:23, 27:16, 27:23, 28:21, 50:8, 63:14, 83:1, 99:6 Davis' [1] - 6:8				

76:23 developed [1] - 24:15 developing [1] - 16:17 difference [3] - 82:4, 82:8, 100:12 different [11] - 14:21, 18:6, 18:7, 21:8, 25:4, 36:12, 36:13, 48:17, 70:15, 80:14, 81:22 difficult [3] - 16:21, 61:18, 97:20 digest [1] - 62:17 direct [4] - 46:5, 46:11, 85:22, 101:16 directly [1] - 36:25 director [5] - 8:6, 25:7, 27:3, 29:21, 38:9 Directors [1] - 90:20 DIRECTORS [1] - 1:8 directors [1] - 95:14 dirty [1] - 81:13 disagree [1] - 85:17 disagreeing [1] - 84:16 disagreement [1] - 86:11 discovery [7] - 4:5, 54:6, 54:9, 54:19, 72:23, 86:24, 87:9 discuss [3] - 22:13, 34:10, 45:17 discussed [6] - 22:12, 30:9, 31:14, 36:6, 91:6, 98:17 discussing [1] - 53:3 discussion [17] - 39:12, 39:18, 52:16, 62:19, 91:11, 91:15, 94:15, 94:19, 94:21, 95:3, 99:1, 99:2, 99:14, 99:23, 100:6, 100:13 Discussion [1] - 55:3 discussions [2] - 29:16, 30:1 diseases [1] - 11:15 dislike [2] - 49:21, 62:2 Dispatch [2] - 59:24, 60:6 displays [1] - 11:21 disregard [1] - 49:21 disrespect [1] - 41:10 disrespectful [1] - 38:5 disrupt [3] - 61:11, 82:1, 86:14 dissatisfied [2] - 97:17, 97:22	distinction [3] - 82:14, 100:1, 100:6 distributed [3] - 89:14, 93:12, 96:17 distributes [1] - 93:14 District [3] - 7:12, 77:15, 90:21 district [17] - 11:18, 14:18, 16:14, 20:8, 20:12, 25:25, 27:9, 34:5, 37:12, 45:1, 58:8, 71:10, 71:16, 72:7, 73:12, 76:16, 81:18 DISTRICT [1] - 1:9 disturbed [1] - 80:2 division [2] - 14:6, 15:8 doctor [1] - 21:4 document [3] - 57:12, 77:3, 89:17 documentation [1] - 79:6 dog [5] - 78:9, 78:10, 78:13, 78:20 dogs [2] - 78:11, 78:14 dollar [3] - 50:2, 70:24 done [7] - 8:23, 9:16, 9:18, 21:6, 23:20, 83:12, 88:2 doors [1] - 83:6 down [7] - 5:25, 24:14, 35:18, 50:13, 55:2, 91:2, 91:4 Dr [29] - 10:2, 12:17, 12:22, 12:24, 13:25, 14:4, 14:14, 14:21, 14:24, 15:4, 15:5, 26:7, 28:5, 30:7, 42:6, 44:25, 45:4, 50:14, 50:19, 51:6, 58:6, 64:16, 64:20, 64:21, 65:5, 68:17, 74:1, 74:6, 74:9 drank [1] - 47:8 draw [1] - 100:5 drinking [1] - 28:11 Drive [1] - 1:23 drove [1] - 7:10 drumming [1] - 61:11 due [3] - 10:17, 35:8, 98:4 duly [4] - 4:12, 77:16, 101:6, 101:8 duly-elected [1] - 77:16 during [3] - 8:20, 26:22, 98:15 dusty [1] - 81:13	duties [1] - 97:21 duty [1] - 5:8 E E-mail [1] - 3:8 e-mail [37] - 3:8, 27:20, 27:21, 33:9, 33:10, 33:13, 33:22, 34:13, 34:20, 35:16, 36:17, 36:22, 37:22, 40:5, 40:13, 41:12, 41:21, 42:5, 43:7, 44:18, 52:23, 54:11, 55:18, 56:17, 59:14, 59:25, 64:21, 67:2, 67:3, 74:25, 75:2, 83:3, 88:25, 89:2, 89:7, 89:13, 89:24 e-mails [12] - 36:19, 42:2, 42:8, 55:9, 56:1, 56:10, 56:11, 83:24, 84:12, 85:8, 93:22, 93:25 easier [1] - 81:12 East [2] - 1:19, 2:4 eat [1] - 50:16 eating [1] - 51:7 Economic [1] - 23:5 educated [1] - 33:8 education [6] - 19:24, 20:5, 22:3, 27:23, 68:17, 70:12 Education [5] - 10:14, 10:17, 11:10, 11:17, 12:10 educational [2] - 6:12, 21:22 educator [1] - 6:21 effect [4] - 48:25, 49:7, 49:13, 53:6 effort [1] - 70:4 efforts [1] - 70:9 eight [1] - 42:15 Eisenhower [4] - 75:3, 75:10, 75:13, 76:2 either [11] - 18:20, 19:23, 21:22, 22:3, 26:9, 45:23, 47:17, 52:9, 59:14, 70:9, 84:6 elected [6] - 7:16, 8:11, 9:4, 50:7, 77:16, 81:5 election [2] - 8:9, 50:11 electronic [4] - 54:2, 54:4, 55:9, 63:6 ELLIOTT [22] - 1:3, 1:4, 2:3, 4:15, 43:2,	43:5, 47:10, 47:15, 54:21, 55:1, 55:5, 57:8, 57:10, 88:11, 88:18, 89:10, 89:16, 89:21, 90:14, 98:12, 98:14, 100:15 Elliott [4] - 3:3, 4:16, 77:10 emotional [2] - 29:7, 72:10 emotionally [1] - 73:21 employed [4] - 6:17, 6:19, 6:21, 37:11 employee [1] - 101:14 employment [1] - 7:5 encourage [1] - 64:15 encouraging [1] - 27:25 end [1] - 61:5 enforce [1] - 38:8 enforcing [1] - 81:25 engage [4] - 91:19, 91:24, 92:8, 92:12 engagement [1] - 44:11 entail [1] - 39:2 entire [1] - 62:11 entitled [1] - 67:13 ESQUIRE [2] - 2:3, 2:8 essentially [4] - 14:15, 14:16, 21:11, 25:9 Etters [1] - 4:22 evaluate [1] - 72:7 evening [4] - 37:17, 40:15, 45:9, 67:22 evidence [5] - 81:24, 84:17, 85:4, 85:22, 86:2 exact [12] - 9:15, 13:12, 17:1, 17:17, 23:18, 26:3, 30:19, 31:19, 32:4, 46:5, 46:8, 59:9 exactly [3] - 31:16, 41:1, 69:14 EXAMINATION [4] - 3:2, 4:14, 90:17, 98:13 examples [1] - 81:11 except [2] - 4:7, 81:3 excerpt [1] - 76:15 exchange [7] - 3:8, 33:13, 36:17, 36:23, 41:12, 52:23, 75:2 excuse [2] - 78:22, 93:21 executive [12] - 9:1, 12:23, 16:20, 36:5, 49:1, 50:10, 50:18,	59:15, 60:19, 71:13, 74:13 exhausted [1] - 94:24 Exhibit [1] - 88:16 EXHIBIT [1] - 3:7 exhibit [1] - 54:23 EXHIBITS [1] - 3:6 expensive [1] - 81:7 experience [8] - 7:20, 19:22, 21:21, 22:2, 27:6, 69:25, 70:11, 97:12 experienced [1] - 17:3 expertise [1] - 20:14 Expiration [1] - 101:22 explained [1] - 20:10 express [1] - 28:22 expressed [8] - 28:25, 56:25, 58:13, 58:22, 59:5, 59:16, 59:17, 81:21 expressing [2] - 58:25, 86:11 F face [1] - 69:7 Facebook [3] - 79:12, 87:1, 87:11 facility [1] - 80:4 facing [1] - 34:5 fact [12] - 26:25, 27:1, 46:13, 52:13, 53:4, 53:24, 55:6, 60:24, 64:7, 69:20, 74:21, 98:4 factfinding [4] - 18:3, 19:15, 19:17, 28:15 factor [1] - 81:16 facts [2] - 28:2, 82:24 fair [8] - 25:8, 49:1, 58:12, 58:21, 81:9, 81:10, 85:15, 97:14 fairly [6] - 46:5, 48:13, 50:7, 79:16, 82:19, 97:23 familiar [1] - 42:9 families [1] - 73:13 fashion [2] - 6:10, 62:7 father [1] - 75:15 favor [1] - 66:8 favorable [1] - 83:25 February [4] - 1:16, 62:10, 62:15, 86:4 fees [3] - 69:12, 69:13, 73:12 felt [17] - 9:25, 14:5, 16:12, 17:1, 17:8,
--	--	--	---	---

18:1, 20:15, 21:7, 21:9, 23:11, 29:1, 50:4, 62:18, 64:19, 70:22, 73:19, 78:25 female [1] - 12:8 fifth [2] - 11:11, 11:20 figure [1] - 46:24 figuring [1] - 46:25 filed [1] - 76:16 files [2] - 40:20, 66:24 filing [1] - 4:6 finally [1] - 10:24 finance [1] - 28:7 fined [2] - 26:25, 27:1 fine [3] - 6:4, 41:23, 77:7 firehose [1] - 28:11 firm [11] - 19:25, 20:1, 20:5, 20:15, 20:24, 34:7, 35:23, 36:6, 37:12, 43:16, 70:23 firms [3] - 21:1, 24:13, 24:24 first [17] - 8:5, 8:8, 17:15, 24:18, 33:19, 33:24, 35:17, 42:3, 42:7, 42:19, 43:2, 47:16, 47:17, 48:6, 83:12, 90:22, 96:15 firsts [1] - 99:1 Fishing [2] - 10:20, 13:2 five [5] - 11:11, 20:7, 47:3, 47:4, 96:7 five-four [1] - 47:3 flashlight [1] - 54:13 flood [1] - 56:17 floor [1] - 7:9 Floor [1] - 2:9 flow [1] - 29:12 flowing [1] - 47:5 folks [1] - 68:10 follow [4] - 51:21, 72:7, 75:5, 90:15 follow-up [3] - 51:21, 75:5, 90:15 following [2] - 42:6, 72:9 follows [1] - 4:12 food [1] - 51:7 force [1] - 83:9 foresee [3] - 34:8, 40:18, 43:13 forget [2] - 71:19, 82:21 forgot [1] - 11:24 form [1] - 4:7 format [1] - 64:21 formed [1] - 80:24	forming [2] - 15:22, 76:18 forth [2] - 6:2, 30:15 forthcoming [1] - 73:20 forward [14] - 10:12, 12:24, 23:16, 25:10, 26:1, 39:7, 52:11, 57:22, 62:17, 66:2, 68:1, 68:12, 68:22, 68:23 forwarded [2] - 55:13, 58:4 forwarding [1] - 42:11 foundation [1] - 98:2 four [12] - 7:23, 8:12, 20:7, 30:21, 30:25, 47:3, 47:4, 49:9, 49:15, 50:5, 53:8, 94:23 four-five [1] - 47:4 four-year [1] - 8:12 Fourhman [4] - 60:17, 61:5, 61:6, 74:3 fourhman's [1] - 60:21 fourth [1] - 44:12 Fox [5] - 60:20, 60:21, 61:6, 61:8, 74:3 frame [1] - 8:9 Fred [1] - 82:19 Friday [2] - 47:24, 48:2 friend [2] - 78:9, 78:17 friends [5] - 60:18, 87:1, 87:11, 87:15, 87:16 frustrated [1] - 29:13 frustration [1] - 28:25 fucking [1] - 48:15 fundamental [1] - 49:6 fundamentals [2] - 81:14, 85:9 FURMAN [1] - 2:8	go-to [1] - 31:11 goal [2] - 34:2, 40:24 goals [1] - 22:14 God [1] - 77:23 gosh [1] - 57:6 government [1] - 7:21 grade [4] - 11:10, 11:11, 11:12 graders [2] - 11:11, 11:20 graduated [1] - 7:2 Grandview [1] - 7:14 grant [1] - 50:2 grasp [1] - 18:4 great [2] - 24:8, 80:19 GREENHALL [1] - 2:8 ground [1] - 5:2 group [6] - 79:3, 79:9, 79:13, 83:18, 83:22, 83:25 Group [1] - 14:13 groups [1] - 85:17 Growth [1] - 23:5 GSP [2] - 78:16, 78:17 guess [3] - 10:23, 35:19, 37:25 Guistwhite [14] - 14:8, 17:4, 23:19, 24:6, 24:16, 28:10, 30:23, 38:10, 47:18, 49:20, 51:2, 51:14, 65:8, 98:5 Guistwhite's [1] - 68:25 Gullifty's [1] - 75:17	26:6, 29:24, 33:8, 33:9, 34:21, 35:7, 36:11, 37:8, 37:22, 38:1, 40:9, 44:10, 46:17, 67:1, 69:13, 70:21, 76:5, 83:2 hall's [5] - 34:20, 35:9, 43:15, 67:2, 76:10 Hall's [3] - 19:1, 33:22, 40:5 hand [2] - 51:9, 80:19 handed [1] - 60:14 handing [2] - 77:25, 80:5 handle [1] - 80:21 handling [1] - 45:19 hard [1] - 98:1 Harmon [4] - 2:15, 77:11, 79:8, 83:20 HARMON [1] - 1:4 Harrisburg [3] - 2:9, 7:3, 7:8 hate [2] - 61:14, 61:16 Haven [1] - 4:21 head [3] - 5:25, 20:4, 91:17 Health [5] - 7:8, 10:14, 10:17, 11:4, 11:22 health [1] - 17:8 hear [3] - 5:10, 5:11, 59:9 heard [7] - 5:16, 10:3, 19:1, 23:19, 60:7, 75:18, 78:1 HEIDI [2] - 1:9, 4:10 Heidi [6] - 1:14, 4:21, 25:15, 35:9, 42:21, 82:25 hello [1] - 50:14 help [1] - 70:12 helped [1] - 98:5 hereby [2] - 4:2, 101:7 hereto [1] - 101:15 hesitate [1] - 34:11 high [7] - 9:3, 77:21, 78:1, 79:1, 84:21, 87:25, 88:1 HIGH [1] - 1:4 High [7] - 77:11, 79:12, 79:17, 80:13, 81:22, 85:12, 87:14 himself [1] - 20:17 hindsight [2] - 39:6, 56:14 hire [3] - 23:25, 31:18, 45:8 hiring [3] - 31:1, 59:18, 92:8 his/her [1] - 101:9 history [3] - 7:5,	71:18, 73:1 hmm [3] - 9:12, 19:6, 24:12 hmm-mm [1] - 19:6 Holy [1] - 7:14 honestly [5] - 32:4, 45:10, 46:8, 59:8, 60:10 hooky [1] - 74:15 hope [1] - 46:6 horseshoe [1] - 99:8 Hospital [1] - 7:8 hourly [3] - 69:18, 69:21, 70:7 hours [3] - 93:15, 94:23, 97:4 HR [1] - 28:6 hung [2] - 31:25, 48:19 Hunter [1] - 1:18 HUNTER [1] - 2:3 husband [2] - 60:21, 61:7 hygiene [1] - 11:12
I				
icy [3] - 16:19, 50:25, 64:14 idea [10] - 9:7, 24:2, 37:20, 38:17, 60:23, 61:10, 65:13, 76:1, 76:13 ideas [1] - 18:7 ideations [1] - 62:1 identification [1] - 88:17 identify [1] - 71:25 ideology [1] - 80:23 illegitimate [2] - 77:13, 80:16 impetus [2] - 15:12, 71:3 implicitly [1] - 86:23 implying [1] - 67:1 important [3] - 24:23, 49:14, 64:19 imposing [1] - 77:13 impossible [1] - 97:23 impression [1] - 65:18 improper [5] - 82:11, 84:19, 84:20, 85:24, 86:1 IN [1] - 1:1 in-between [1] - 50:5 in-person [1] - 26:10 inappropriate [3] - 41:21, 79:25, 88:3 incident [1] - 80:13 inclined [1] - 99:12				

includes [1] - 43:25 inconsistencies [2] - 72:14, 72:24 incorrect [2] - 41:21, 82:9 Independence [1] - 23:2 INDEX [2] - 3:1, 3:6 indicate [3] - 26:5, 57:17, 58:2 indicated [6] - 18:10, 45:21, 58:19, 68:25, 71:2, 98:15 indicates [2] - 33:23, 36:15 indicating [1] - 90:7 indication [1] - 39:25 inform [1] - 33:25 information [23] - 18:3, 28:5, 28:9, 43:10, 43:11, 43:12, 43:14, 43:17, 44:8, 44:9, 44:10, 53:15, 62:24, 64:9, 69:14, 69:23, 70:22, 76:4, 76:12, 77:9, 91:12, 91:14, 91:21 informed [3] - 35:23, 35:25, 45:6 informing [1] - 51:21 inherent [1] - 66:20 input [5] - 16:2, 17:10, 76:23, 77:3, 92:24 inside [1] - 61:3 instance [4] - 15:11, 15:17, 15:21, 68:24 instances [1] - 9:25 Institute [1] - 11:4 institute [1] - 11:9 instructed [1] - 38:12 insulting [2] - 87:22, 88:3 interaction [1] - 88:5 interested [1] - 78:10 interesting [1] - 75:25 Interrogatory [2] - 18:8, 26:4 interview [2] - 23:7, 67:16 interviewed [1] - 24:13 involved [1] - 19:18 irrespective [1] - 70:7 island [1] - 17:9 issue [4] - 55:20, 70:17, 72:1, 72:2 issued [1] - 14:24 issues [2] - 17:8, 34:4 item [15] - 42:15, 43:12, 43:19, 46:7,	49:6, 49:13, 51:22, 52:21, 53:23, 53:25, 60:9, 91:12, 91:14, 91:21, 93:20 items [11] - 34:10, 42:11, 42:22, 43:8, 44:1, 44:13, 44:19, 44:20, 88:9, 96:16, 96:20 itself [1] - 80:16	J Jamie [1] - 14:24 Jan [1] - 77:11 JAN [1] - 1:4 Jane [2] - 77:12, 84:10 JANE [1] - 1:5 January [10] - 8:16, 9:1, 9:5, 9:6, 62:10, 86:3, 90:23, 91:9, 91:13, 97:16 JARRETT [1] - 1:5 Jarrett [1] - 77:11 jbonn@cohenseglias.com [1] - 2:10 JEFF [1] - 1:4 Jeff [3] - 2:15, 77:11, 88:13 Jesse [1] - 77:12 JESSE [1] - 1:5 jnellottesq@comcast.net [1] - 2:5 job [4] - 13:25, 21:6, 51:10, 77:1 Joel [1] - 79:9 JOHN [2] - 1:3, 2:3 John [3] - 4:16, 77:10, 89:12 Josh [1] - 90:19 JOSHUA [1] - 2:8 journey [1] - 47:5 Judy [1] - 82:22 July [2] - 86:4, 86:6 June [2] - 86:4, 101:22 justify [1] - 72:1 juvenile [1] - 50:22	keeping [1] - 81:16 Kelly [14] - 13:20, 16:16, 24:25, 45:11, 66:4, 66:10, 66:11, 66:16, 68:20, 69:7, 82:25, 95:16, 95:20 KELLY [1] - 1:10 kept [1] - 15:8 Kevin [46] - 17:15, 18:11, 18:12, 20:10, 20:17, 21:20, 21:25, 26:11, 26:24, 28:23, 30:2, 31:1, 32:6, 33:14, 33:22, 35:9, 36:21, 37:16, 41:5, 41:16, 42:4, 42:10, 42:14, 43:6, 45:18, 47:19, 48:7, 48:8, 53:9, 65:14, 65:19, 66:3, 66:8, 66:17, 67:17, 69:10, 69:25, 70:10, 71:6, 74:21, 76:2, 93:19, 94:16, 96:7, 96:9, 98:21 Kilby [3] - 1:20, 101:6, 101:20 kind [35] - 13:7, 13:11, 13:13, 16:11, 16:13, 16:14, 17:8, 21:21, 23:19, 24:7, 25:2, 27:24, 28:3, 28:10, 28:15, 29:4, 29:20, 32:19, 32:24, 33:4, 39:1, 39:19, 49:12, 49:25, 53:11, 56:5, 61:22, 65:2, 67:14, 68:12, 72:18, 73:2, 74:10, 78:13, 88:7 knowing [1] - 97:24 knowledge [15] - 25:4, 47:17, 49:9, 49:15, 52:8, 54:1, 54:9, 60:20, 63:23, 89:22, 89:25, 92:18, 100:5, 100:12, 101:9 knowledgeable [1] - 54:17 known [1] - 19:4	20:5, 21:1, 21:22, 22:3, 59:11, 64:2, 70:13, 72:9, 93:16 Law [3] - 1:3, 23:2, 54:15 lawsuit [11] - 71:10, 71:17, 71:20, 72:3, 73:24, 77:13, 80:16, 84:24, 85:5, 85:7, 85:11 lawyer [2] - 33:2, 70:18 lawyer's [1] - 77:1 lead [2] - 18:1, 29:1 Leader [13] - 8:16, 8:23, 9:4, 9:17, 20:8, 20:11, 23:14, 23:25, 44:4, 45:8, 69:16, 70:2, 70:20 leading [2] - 26:19, 55:11 Leah [1] - 77:10 LEAH [1] - 1:3 leaned [2] - 26:14, 26:15 learn [2] - 96:15, 96:20 learning [2] - 39:7, 72:11 least [4] - 59:24, 66:7, 67:23, 89:23 leaving [1] - 74:13 led [2] - 20:20, 67:25 left [5] - 12:16, 31:7, 39:20, 53:16, 78:4 legal [5] - 9:8, 72:19, 77:3, 82:13, 100:1 legitimate [1] - 95:12 less [3] - 69:15, 69:18, 69:21 letter [2] - 35:7, 44:11 Lewisberry [1] - 7:22 liability [1] - 73:8 liable [1] - 72:8 life [1] - 39:7 light [1] - 15:15 line [2] - 75:19, 87:13 line-up [1] - 75:19 lines [2] - 29:20, 59:25 Lisa [2] - 79:6, 84:10 list [5] - 34:4, 43:25, 56:23, 87:1, 87:11 listed [2] - 44:20, 57:1 listen [3] - 59:9, 94:9, 94:13 listening [3] - 10:1, 13:23, 15:13 listing [1] - 57:15 live [3] - 12:5, 12:7, 39:6	LLP [2] - 1:18, 2:3 loaded [2] - 96:24, 97:5 look [9] - 33:15, 44:11, 56:22, 57:11, 64:16, 75:6, 88:7, 88:20, 92:5 looked [9] - 13:5, 18:20, 19:25, 21:7, 57:3, 74:11, 75:1, 78:20, 89:16 looking [8] - 18:18, 40:13, 41:22, 56:5, 61:19, 81:17, 90:12, 92:17 looks [4] - 42:4, 42:19, 65:5, 88:25 loop [2] - 72:18, 72:19 lost [8] - 80:1, 80:20, 82:19, 82:20, 82:22, 82:23, 82:24, 83:11 lover [1] - 78:10
		M mail [38] - 3:8, 3:8, 27:20, 27:21, 33:9, 33:10, 33:13, 33:22, 34:13, 34:20, 35:16, 36:17, 36:22, 37:22, 40:5, 40:13, 41:12, 41:21, 42:5, 43:7, 44:18, 52:23, 54:11, 55:18, 56:17, 59:14, 59:25, 64:21, 67:2, 67:3, 74:25, 75:2, 83:3, 88:25, 89:2, 89:7, 89:13, 89:24 mails [12] - 36:19, 42:2, 42:8, 55:9, 56:1, 56:10, 56:11, 83:24, 84:12, 85:8, 93:22, 93:25 main [2] - 21:11, 88:24 majority [9] - 10:1, 14:3, 15:13, 15:19, 58:13, 64:14, 71:4, 71:7, 77:15 manage [1] - 28:12 mandatory [2] - 8:7, 99:13 MANDY [1] - 1:11 Mandy [4] - 26:17, 26:23, 28:21, 83:1 manipulate [2] - 38:8, 83:9 mannequins [1] - 11:23 manner [1] - 58:14 March [7] - 18:11,			

26:6, 26:11, 26:22, 62:10, 86:4, 101:17 mark [1] - 54:23 marked [7] - 33:12, 42:2, 56:20, 75:1, 76:15, 88:16, 88:19 Market [2] - 1:19, 2:4 Markey [1] - 1:18 MARKEY [1] - 2:3 Marvin [2] - 79:4, 84:11 mat [2] - 61:21, 64:14 material [2] - 10:19, 11:21 matter [2] - 4:17, 76:16 matters [3] - 34:6, 97:25, 101:9 mean [18] - 18:16, 19:25, 22:22, 26:12, 27:1, 33:7, 40:22, 41:3, 41:8, 41:9, 42:18, 44:7, 47:1, 60:15, 68:8, 68:9, 91:4, 91:7 meaning [1] - 63:13 means [6] - 5:5, 25:12, 77:13, 80:17, 86:12, 101:15 meet [2] - 10:24, 63:12 meeting [98] - 9:10, 10:21, 11:2, 11:5, 12:11, 12:12, 12:17, 12:25, 14:4, 14:13, 24:10, 26:7, 27:14, 29:7, 29:14, 30:9, 32:10, 32:11, 34:9, 34:11, 35:1, 35:14, 35:24, 36:2, 36:5, 37:2, 37:5, 39:25, 40:7, 40:19, 42:12, 42:23, 43:9, 44:13, 45:24, 46:21, 47:21, 50:24, 52:16, 53:25, 54:13, 55:8, 55:11, 55:15, 55:22, 56:1, 56:21, 56:25, 57:17, 57:19, 57:24, 58:3, 58:10, 59:9, 59:13, 59:25, 60:4, 61:22, 62:20, 62:24, 63:4, 63:12, 63:17, 63:18, 68:14, 72:21, 74:17, 74:20, 75:11, 79:18, 83:7, 86:6, 86:8, 90:4, 90:7, 90:24, 91:11, 92:3, 92:16, 92:19, 93:6, 93:10, 93:23, 94:2, 94:12, 96:11, 96:16, 96:20,	96:21, 97:11, 98:16, 98:17, 98:24, 99:17, 99:21, 100:7 meetings [14] - 10:12, 16:7, 20:25, 21:12, 29:1, 29:8, 30:14, 49:1, 61:12, 72:16, 73:6, 82:16, 87:18, 95:2 member [5] - 28:2, 78:7, 85:13, 86:12, 90:5 members [35] - 15:24, 16:5, 16:12, 17:4, 30:22, 38:13, 43:15, 49:2, 49:9, 49:15, 50:6, 52:21, 52:25, 53:4, 53:8, 54:2, 59:5, 59:17, 61:16, 63:20, 64:12, 65:14, 66:13, 67:16, 72:18, 74:20, 77:16, 84:1, 85:17, 95:24, 96:3, 97:8, 98:1 mentally [1] - 94:24 mention [1] - 76:9 mentioned [3] - 76:8, 83:15, 92:15 mentor [1] - 28:18 message [2] - 31:7, 53:16 met [3] - 18:12, 30:7, 39:17 micromanage [1] - 39:21 middle [1] - 50:22 might [12] - 11:13, 24:16, 58:20, 59:6, 70:3, 70:9, 70:12, 71:11, 74:21, 77:23, 88:12, 99:4 Mill [1] - 77:22 million [1] - 50:1 mind [3] - 51:13, 56:9, 63:17 minority [1] - 53:8 minute [5] - 41:16, 47:10, 54:24, 75:6, 88:12 minutes [4] - 50:16, 56:21, 57:2, 92:16 mole [1] - 90:11 mom [1] - 75:16 moment [4] - 33:15, 42:7, 56:22, 88:20 Monday [2] - 96:25, 97:1 month [1] - 67:23 most [3] - 34:4, 61:18, 83:15	motion [1] - 94:18 motivated [2] - 81:12, 86:21 motivation [3] - 85:19, 86:13, 86:14 motive [2] - 81:24, 84:18 MOU [2] - 14:22, 14:23 move [3] - 62:17, 68:12, 68:22 moving [1] - 60:13 Moyer [6] - 38:11, 38:14, 51:4, 65:1, 65:8, 82:20 MR [30] - 4:15, 42:25, 43:2, 43:4, 43:5, 47:7, 47:10, 47:15, 54:7, 54:18, 54:21, 55:1, 55:5, 57:4, 57:8, 57:10, 88:11, 88:18, 89:10, 89:12, 89:16, 89:20, 89:21, 90:14, 90:16, 90:18, 98:10, 98:12, 98:14, 100:15 multiple [1] - 24:13 municipal [1] - 7:20 must [2] - 56:6, 91:5	63:25, 64:7, 65:7, 65:20, 75:8, 83:5, 83:8, 91:23, 98:5 new [14] - 9:2, 9:3, 13:22, 21:25, 26:15, 27:4, 27:25, 28:1, 30:3, 38:12, 57:9, 64:14, 76:16, 79:3 New [1] - 19:19 newer [1] - 64:12 news [2] - 60:23, 68:18 newspapers [1] - 61:8 next [5] - 46:25, 50:14, 51:24, 72:21, 76:14 nice [2] - 31:24, 48:18 nine [1] - 47:3 nine-oh [1] - 47:3 ninth [1] - 90:3 nobody [3] - 50:11, 50:21, 61:20 none [1] - 82:15 normally [1] - 90:8 North [1] - 2:9 Northern [7] - 54:10, 56:13, 78:8, 80:7, 80:24, 85:13, 89:14 Notary [3] - 1:21, 101:6, 101:21 note [2] - 35:17, 35:21 notes [4] - 27:3, 27:7, 27:18, 64:18 nothing [6] - 8:21, 48:17, 67:2, 82:10, 83:3, 98:11 notice [2] - 44:4, 96:19 notified [1] - 95:7 number [7] - 17:20, 17:23, 19:1, 19:11, 58:1, 58:25, 93:25 numerous [5] - 26:16, 56:1, 56:11, 62:16, 94:4 nurse [6] - 6:14, 6:20, 7:6, 7:10, 21:2, 25:6 nursing [1] - 6:14	observed [1] - 49:19 obviously [9] - 5:4, 44:7, 64:6, 67:6, 71:14, 79:1, 80:12, 80:13, 80:23 occasionally [1] - 21:18 occur [1] - 46:19 October [1] - 86:5 OF [4] - 1:1, 1:8, 1:9 official [2] - 17:12, 26:20 often [1] - 30:6 once [1] - 40:8 one [35] - 8:16, 9:4, 10:11, 12:2, 20:9, 21:3, 21:12, 21:16, 21:23, 23:12, 23:15, 29:23, 33:13, 40:2, 42:4, 44:12, 44:19, 50:12, 57:9, 60:15, 60:18, 63:7, 70:5, 71:2, 71:3, 72:16, 73:3, 73:5, 74:9, 75:4, 79:11, 84:12, 86:3, 92:10, 93:7 ones [1] - 58:1 ongoing [1] - 51:24 online [3] - 8:19, 8:20 oOo [1] - 1:13 op [1] - 7:9 open [1] - 62:19 operate [1] - 6:9 opinion [23] - 9:16, 21:9, 28:22, 36:14, 56:3, 56:18, 58:16, 58:22, 58:23, 59:1, 59:2, 61:24, 64:13, 67:12, 68:10, 69:3, 69:4, 73:22, 77:25, 79:22, 83:10, 85:25, 86:18 opportunity [3] - 92:23, 93:17, 95:9 opt [1] - 72:6 options [1] - 18:7 oral [1] - 94:9 orange [1] - 54:13 orchestrated [1] - 56:15 order [1] - 45:7 ordinarily [1] - 93:13 organ [1] - 12:6 organization [2] - 12:3, 22:23 organizations [1] - 22:21 organs [1] - 12:6 otherwise [2] - 5:15, 6:5
N				
name [8] - 4:16, 4:19, 12:8, 79:5, 79:6, 82:22, 83:22, 83:23 named [3] - 84:5, 85:23, 88:2 names [7] - 20:14, 83:24, 84:10, 84:11, 85:8, 86:7, 87:16 narrowed [1] - 24:14 navigate [1] - 28:4 necessarily [1] - 99:24 necessary [2] - 20:21, 36:3 need [20] - 5:9, 5:24, 6:3, 13:21, 28:17, 34:8, 34:16, 35:1, 35:13, 37:1, 37:4, 37:24, 39:25, 40:18, 45:23, 46:4, 46:7, 46:14, 47:10, 70:12 needed [2] - 45:7, 98:3 negative [1] - 82:17 never [26] - 4:25, 12:25, 14:4, 14:22, 14:23, 23:15, 25:5, 37:18, 37:19, 37:20, 41:15, 51:2, 51:3, 51:15, 52:15, 63:13,				
O				
oath [1] - 5:5 Oberlin [1] - 87:14 objections [1] - 4:7 objective [5] - 71:9, 73:3, 73:16, 73:18, 74:4 obligated [2] - 92:7, 92:12 observations [1] - 73:23				

outcome [1] - 71:17 outcry [1] - 68:19 outreaching [1] - 85:7 outside [2] - 63:12, 63:18 overreaching [1] - 35:5 overstepped [2] - 38:19, 39:10 overstepping [1] - 41:17 overview [2] - 8:14, 8:15 own [4] - 17:9, 25:16, 61:22, 85:18 owned [1] - 75:16	40:13, 80:25 passed [1] - 18:10 past [3] - 49:19, 97:12, 98:4 path [1] - 68:1 pause [1] - 62:6 PC [1] - 2:8 penalties [1] - 5:6 Pennsylvania [7] - 1:19, 4:22, 8:6, 72:5, 81:15, 101:3, 101:7 PENNSYLVANIA [1] - 1:1 people [28] - 9:4, 11:3, 13:10, 16:14, 16:20, 16:21, 20:7, 33:2, 37:20, 38:16, 41:8, 56:24, 57:15, 57:23, 58:25, 61:25, 67:6, 67:12, 68:19, 70:15, 79:17, 82:16, 83:11, 83:15, 85:16, 88:6, 90:4, 99:11 people's [1] - 78:11 per [5] - 25:13, 51:18, 70:25, 72:19, 93:15 perceived [1] - 39:8 percent [2] - 19:16, 53:2 perform [1] - 97:20 performance [1] - 97:17 performed [1] - 8:23 period [1] - 7:25 perjury [1] - 5:6 person [12] - 8:18, 8:21, 8:24, 17:25, 21:5, 21:12, 26:10, 33:8, 39:21, 50:12, 50:15, 57:23 personal [1] - 62:3 personally [2] - 19:5, 45:22 Phillips [1] - 6:20 phone [8] - 17:20, 18:22, 19:1, 19:10, 26:9, 26:10, 48:5, 63:21 pick [1] - 75:18 pinched [1] - 50:4 Pinnacle [1] - 7:8 pinning [1] - 25:13 PLACE [1] - 1:18 place [12] - 10:19, 30:13, 30:18, 30:19, 31:5, 31:17, 40:21, 80:22, 91:7, 91:8, 99:17, 99:20 placed [6] - 5:4, 31:4, 40:23, 47:21, 52:22,	96:22 plaintiff [3] - 80:9, 83:20, 84:6 plaintiffs [1] - 84:18 plaintiffs [6] - 77:9, 79:11, 81:25, 83:16, 85:23, 88:2 Plaintiffs [5] - 1:6, 1:15, 2:6, 4:11, 4:17 played [1] - 62:20 pleas [1] - 68:6 PLEAS [1] - 1:1 pleasure [2] - 10:4, 14:3 point [9] - 11:6, 13:14, 18:19, 21:12, 46:9, 47:4, 59:4, 82:15, 98:18 policy [9] - 10:15, 22:14, 44:3, 45:6, 92:4, 92:7, 92:11, 92:21, 92:25 political [10] - 22:21, 22:22, 22:24, 77:14, 80:5, 80:14, 81:23, 82:2, 86:14, 87:14 politically [4] - 81:12, 84:17, 85:18, 86:21 politics [1] - 85:19 poll [7] - 37:19, 64:2, 64:3, 65:12, 83:8, 99:2 polled [1] - 86:3 polling [5] - 77:24, 78:1, 80:4, 80:6, 80:22 poor [1] - 81:17 popular [1] - 65:11 portion [1] - 88:24 posed [1] - 5:23 positive [2] - 65:18, 82:17 possible [4] - 34:3, 40:25, 85:19, 86:13 post [1] - 7:9 post-op [1] - 7:9 postpone [2] - 67:15, 67:22 potential [11] - 19:8, 23:8, 24:24, 26:24, 41:25, 63:8, 67:18, 68:7, 90:23, 93:4, 93:8 potentially [3] - 30:3, 31:1, 44:10 practice [2] - 22:6, 70:15 preceptor [1] - 98:6 predicaments [1] - 73:20	preparation [2] - 37:5, 45:24 prepare [4] - 34:16, 43:18, 44:6, 44:22 prepared [4] - 27:13, 28:13, 29:1, 65:6 preparing [2] - 34:5, 42:14 presence [1] - 36:2 present [5] - 8:25, 12:25, 13:6, 14:7, 94:12 PRESENT [1] - 2:14 presented [4] - 28:9, 69:1, 70:23, 87:8 presenting [1] - 44:8 president [16] - 26:13, 26:14, 28:19, 29:2, 29:5, 38:7, 60:17, 62:12, 64:3, 83:9, 88:7, 96:14, 97:7, 97:15, 97:21, 98:4 President [1] - 35:25 pressing [1] - 34:4 presume [1] - 5:16 pretty [9] - 9:2, 10:5, 11:25, 12:12, 29:8, 46:9, 50:4, 94:24 previous [4] - 6:6, 44:4, 52:4, 70:11 previously [1] - 75:1 primary [3] - 77:21, 77:22, 87:15 principal [1] - 13:1 principle [2] - 15:17, 15:20 printed [1] - 60:14 printout [1] - 101:12 privy [4] - 40:11, 56:8, 65:15, 90:5 problem [1] - 63:8 proceed [1] - 67:21 proceeding [1] - 62:6 process [25] - 16:10, 17:13, 23:24, 24:5, 24:11, 25:1, 25:5, 25:6, 25:11, 25:14, 51:23, 52:2, 52:6, 52:11, 54:6, 67:19, 67:25, 68:3, 68:6, 68:20, 91:19, 91:24, 91:25, 92:8, 92:12 produce [1] - 70:24 productive [3] - 16:22, 16:23, 81:4 professional [9] - 32:19, 32:25, 33:3, 35:3, 37:9, 39:1, 39:2, 39:19, 46:16 proficient [1] - 29:22	program [3] - 71:22, 72:10, 72:11 progressive [1] - 80:25 prompted [1] - 9:13 pronounce [1] - 78:19 proper [1] - 62:7 properly [1] - 72:7 proposal [1] - 9:7 proprietary [1] - 10:18 protocol [1] - 27:8 prove [1] - 72:12 provide [4] - 34:4, 43:14, 92:24, 93:18 provided [3] - 18:9, 92:23, 93:2 provisions [1] - 44:5 PSBA [2] - 8:15, 8:18 Public [3] - 1:21, 101:6, 101:21 public [47] - 10:12, 10:21, 12:17, 14:1, 24:9, 24:10, 29:8, 52:16, 54:1, 54:3, 55:7, 55:24, 56:2, 56:7, 56:8, 61:22, 62:5, 63:3, 63:18, 64:23, 65:4, 67:21, 68:14, 68:15, 73:6, 73:25, 74:21, 86:7, 89:5, 90:10, 91:11, 92:23, 93:2, 93:13, 93:17, 93:18, 93:21, 94:9, 94:10, 94:13, 94:14, 95:7, 95:9, 96:21, 99:17, 99:20 publicly [2] - 90:22, 91:18 pull [1] - 62:15 pump [1] - 41:16 purpose [6] - 24:4, 82:12, 84:20, 84:23, 85:5, 85:24 purposes [1] - 100:10 pushback [1] - 67:21 put [14] - 25:19, 27:11, 31:18, 35:10, 41:3, 41:24, 45:4, 45:5, 49:8, 66:15, 68:22, 69:13, 91:22 putting [7] - 32:3, 34:21, 49:6, 49:13, 63:6, 64:25, 66:3
P				
p.m [4] - 43:7, 88:14, 88:15, 100:17 PA [4] - 1:23, 2:4, 2:9, 23:4 Pack [1] - 23:5 packet [1] - 96:17 page [5] - 33:23, 35:17, 42:19, 43:2, 57:14 PAGE [2] - 3:2, 3:7 Page [1] - 57:21 paid [1] - 73:12 PALLAS [1] - 2:8 paper [2] - 35:20, 60:8 paperwork [2] - 34:6, 54:16 parent [15] - 10:12, 10:16, 10:19, 10:22, 10:25, 11:1, 11:6, 11:20, 11:25, 12:12, 71:21, 72:6, 72:11, 72:12 parental [1] - 71:12 parents [3] - 13:1, 75:15, 75:16 part [11] - 21:3, 25:5, 25:14, 27:2, 29:7, 44:15, 68:2, 72:12, 81:4, 85:10, 86:24 participate [3] - 76:18, 76:23, 94:20 participated [1] - 94:6 participation [1] - 16:3 particular [1] - 9:21 parties [2] - 4:3, 101:14 parts [1] - 60:13 Party [3] - 80:7, 80:24, 89:15 party [3] - 36:19,				
Q				
qualification [1] - 43:15 qualifications [6] - 19:14, 20:3, 20:21,				

22:12, 25:18, 43:24 qualified [3] - 18:1, 20:18, 101:6 quality [1] - 70:25 quantity [1] - 70:25 questions [15] - 5:3, 5:10, 5:22, 11:7, 11:8, 12:2, 12:15, 12:16, 26:18, 27:8, 27:19, 64:10, 89:11, 90:15, 101:10 quote [2] - 61:4 quotes [2] - 27:11, 65:1	reasons [2] - 10:18, 23:16 recalling [1] - 53:20 receive [2] - 51:15, 62:24 received [3] - 51:1, 51:16, 54:2 receiving [1] - 60:15 recent [1] - 6:24 reception [1] - 50:25 recess [2] - 47:13, 88:14 recognize [7] - 33:20, 42:8, 78:12, 82:4, 82:8, 83:23, 88:21 recollect [2] - 50:7, 51:5 recollection [3] - 5:9, 44:21, 73:5 recommend [1] - 19:8 recommended [1] - 46:16 record [4] - 4:20, 55:3, 55:4, 101:12 recorded [1] - 101:11 records [1] - 18:22 Red [1] - 77:22 reduced [1] - 101:11 refer [1] - 54:23 referenced [1] - 60:1 referring [4] - 43:21, 68:16, 71:21, 89:7 refuse [1] - 68:6 refused [1] - 14:17 regard [7] - 19:23, 22:14, 30:11, 49:24, 60:1, 74:7, 89:3 regarding [4] - 95:17, 95:21, 95:25, 96:4 regardless [2] - 38:16, 77:15 region [1] - 79:13 registered [2] - 6:14, 21:2 regrets [1] - 38:15 regular [1] - 63:12 regulations [1] - 12:9 related [2] - 8:3, 85:2 relation [1] - 87:10 relationship [4] - 13:15, 14:21, 24:20, 74:2 relative [1] - 101:14 relevant [2] - 87:19, 87:22 religious [1] - 71:25 remember [21] - 7:24, 9:15, 11:5, 18:3, 20:2, 20:6, 24:8, 31:16, 32:4, 43:23,	45:11, 46:4, 48:1, 53:3, 53:13, 53:17, 74:11, 87:2, 88:9, 91:15, 92:14 renew [1] - 23:21 repeat [1] - 5:12 repetition [2] - 70:3, 70:9 rephrase [1] - 5:13 replace [2] - 95:11, 98:8 report [1] - 16:6 Reporter [3] - 1:21, 101:6, 101:20 REPORTER [1] - 1:20 reporter [1] - 5:21 represent [5] - 4:17, 10:7, 20:23, 71:7, 71:16 represented [1] - 22:8 representing [1] - 71:4 reproduction [1] - 101:15 reproductive [1] - 12:6 Republican [1] - 79:16 request [1] - 9:7 requested [1] - 55:4 required [1] - 3:8 reserved [1] - 4:8 residents [1] - 58:8 resources [1] - 20:11 respect [1] - 35:8 respective [1] - 4:3 response [6] - 33:15, 35:16, 36:3, 55:20, 76:19, 76:24 responses [3] - 5:23, 18:8, 26:5 responsible [1] - 15:22 Restaurant [1] - 75:17 review [3] - 8:10, 42:7, 94:5 revisit [1] - 67:18 RFP [36] - 9:14, 9:18, 9:19, 13:21, 15:23, 15:25, 16:3, 17:13, 23:15, 23:16, 23:20, 24:4, 24:5, 24:11, 25:1, 25:5, 25:6, 25:11, 25:14, 32:3, 51:23, 52:10, 52:16, 66:3, 67:18, 67:25, 68:3, 68:6, 68:20, 69:1, 91:19, 91:21, 91:24, 91:25, 92:8, 92:12 Rhonda [2] - 60:17,	74:2 right-to-know [1] - 8:3 rightfully [1] - 56:3 rights [1] - 71:12 Road [1] - 4:21 role [9] - 10:2, 20:22, 26:16, 27:5, 27:25, 28:19, 29:22, 98:3, 98:6 roles [1] - 21:8 rolled [1] - 61:20 room [3] - 13:10, 56:16, 83:21 rougher [1] - 61:19 rules [1] - 5:2 run [1] - 61:21 runs [1] - 25:16	see [26] - 10:13, 10:16, 10:19, 36:9, 39:4, 39:23, 40:4, 40:12, 40:16, 42:21, 43:8, 43:10, 44:14, 44:15, 44:16, 55:14, 60:3, 61:3, 66:20, 69:22, 78:2, 86:6, 87:16, 88:6, 88:7, 90:10 seeing [2] - 62:4, 78:3 seem [3] - 74:4, 79:20, 86:10 sees [1] - 55:24 SEGLIAS [1] - 2:8 select [3] - 25:11, 25:22, 51:24 selected [1] - 58:15 selecting [1] - 49:7 send [4] - 9:13, 43:23, 56:17, 93:22 sent [7] - 43:6, 43:17, 43:20, 54:11, 55:19, 84:12, 86:25 sentence [2] - 33:24, 72:13 sentences [2] - 34:23, 41:6 sentiment [1] - 67:15 separate [2] - 63:11, 84:13 September [1] - 86:5 serve [1] - 20:21 served [2] - 8:10, 50:13 serves [2] - 10:4, 14:2 services [1] - 9:8 serving [4] - 7:20, 15:18, 21:22, 98:4 session [10] - 9:1, 12:23, 16:20, 36:5, 50:10, 50:18, 59:15, 60:19, 71:13, 74:13 sessions [1] - 49:1 set [1] - 24:14 setting [1] - 87:15 settled [2] - 73:7, 73:11 seven [2] - 47:4, 97:3 seven-three [1] - 47:4 several [1] - 89:17 shared [5] - 52:25, 57:16, 57:18, 58:2, 88:22 sheet [3] - 44:9, 44:10, 69:14 sheets [1] - 69:23 Sheri [2] - 38:11, 82:19 shit [4] - 61:1, 67:10, 67:11
R			S	
race [2] - 82:25, 83:11 raised [2] - 9:8, 11:6 ran [4] - 79:14, 79:25, 80:19, 81:1 rate [3] - 69:18, 69:21, 70:7 ray [1] - 21:5 razors [1] - 11:24 Re [1] - 3:8 RE [1] - 98:13 re [1] - 8:11 re-elected [1] - 8:11 RE-EXAMINATION [1] - 98:13 reach [6] - 28:4, 32:20, 39:16, 39:18, 45:16, 64:17 reached [1] - 10:22 reaching [1] - 33:24 reaction [2] - 48:13, 65:13 read [18] - 14:10, 27:6, 27:7, 27:17, 27:18, 43:22, 55:4, 55:14, 56:10, 58:9, 59:8, 62:17, 64:18, 74:9, 74:14, 75:21, 75:23, 97:1 reading [4] - 4:5, 40:5, 40:23, 61:23 ready [1] - 57:4 realized [1] - 15:7 really [19] - 9:25, 13:15, 13:17, 13:19, 14:25, 15:2, 16:16, 16:18, 16:19, 19:3, 19:16, 38:21, 45:10, 47:1, 68:11, 70:19, 71:15, 85:5, 88:5 Ream [1] - 1:18 REAM [1] - 2:3 reason [3] - 9:22, 72:1, 82:10			Saint [1] - 19:20 Sam [2] - 79:6, 84:10 sat [5] - 50:13, 51:5, 99:4, 99:6, 99:7 sausage [1] - 45:3 saw [5] - 41:11, 41:12, 62:20, 79:5, 79:6 Say's [1] - 97:17 Sayre [1] - 77:12 SAYRE [1] - 1:5 scale [1] - 16:16 scenes [1] - 45:3 schedule [2] - 69:1, 69:2 SCHOOL [2] - 1:8, 1:9 school [28] - 7:7, 7:10, 7:17, 8:5, 16:14, 19:23, 20:8, 20:12, 22:3, 22:8, 22:15, 24:18, 25:7, 25:25, 27:2, 27:9, 29:21, 34:5, 37:12, 38:9, 45:1, 50:22, 58:8, 71:10, 71:16, 72:7, 73:11, 81:18 School [5] - 7:12, 8:6, 77:14, 81:15, 90:21 scope [2] - 22:5, 22:6 scores [1] - 81:18 Scouts [1] - 19:19 screamed [1] - 31:23 script [1] - 41:5 scrub [1] - 21:5 se [4] - 25:13, 51:18, 71:1, 72:19 sealing [1] - 4:5 second [3] - 33:23, 42:25, 50:24 seconds [1] - 99:2 secretary [1] - 45:2	

shook [2] - 51:8, 80:18 SHORE [1] - 1:9 Shore [8] - 7:12, 77:14, 79:4, 79:8, 84:2, 84:11, 90:20 short [2] - 46:5, 46:9 show [7] - 10:25, 33:11, 42:1, 56:19, 74:25, 76:14, 88:19 showing [2] - 68:18, 86:25 shows [1] - 86:2 sic [1] - 46:7 sic [1] - 20:4 signed [1] - 35:7 signing [1] - 4:5 similar [2] - 66:12, 85:9 simply [1] - 34:14 sit [4] - 50:16, 62:21, 99:5, 99:8 sitting [2] - 78:4, 88:8 situation [2] - 46:23, 84:13 six [4] - 11:10, 11:12, 20:7, 40:21 small [3] - 13:18, 19:20, 51:6 smaller [1] - 13:10 smart [1] - 38:4 smelled [1] - 61:1 smells [1] - 67:10 smooth [2] - 34:2, 40:24 sneaky [1] - 61:2 social [1] - 72:10 social-emotional [1] - 72:10 solely [1] - 82:1 solicitor [59] - 9:20, 9:22, 10:4, 13:22, 18:2, 19:8, 19:23, 20:18, 21:22, 22:1, 22:3, 22:7, 23:8, 24:24, 25:11, 25:22, 26:24, 30:2, 30:4, 30:12, 31:2, 32:7, 34:1, 42:17, 45:19, 46:21, 47:20, 49:7, 49:14, 51:25, 58:14, 59:18, 66:9, 66:17, 70:1, 70:11, 74:23, 76:3, 90:23, 92:9, 92:13, 93:5, 93:9, 93:19, 94:7, 94:11, 94:16, 94:17, 95:8, 95:11, 95:18, 95:22, 96:1, 96:5, 96:10, 97:9, 97:18, 97:22,	98:16 solicitor's [1] - 13:25 solicitors [2] - 67:18, 68:7 solid [1] - 98:2 sometime [1] - 9:1 sometimes [5] - 29:2, 95:3, 96:22, 97:1, 99:9 sorry [6] - 6:25, 40:3, 43:4, 47:8, 80:20, 100:9 sort [5] - 15:12, 48:25, 66:2, 86:22, 89:4 sound [1] - 18:17 sounded [1] - 48:12 sounds [1] - 18:16 speaking [3] - 22:18, 28:23, 31:1 speaks [1] - 48:17 specific [1] - 72:13 specifically [13] - 10:8, 26:13, 29:18, 36:20, 46:2, 59:21, 60:13, 77:8, 84:19, 85:23, 88:9, 92:14, 98:23 speed [1] - 70:12 spell [1] - 76:6 Spirit [1] - 7:15 spoken [2] - 26:5, 48:24 spotlight [1] - 81:6 SS [1] - 101:2 stand [1] - 82:18 standpoint [1] - 21:8 start [2] - 40:20, 66:23 started [2] - 8:5, 55:18 starts [2] - 57:21, 75:4 state [2] - 4:19, 85:25 statement [11] - 12:24, 16:23, 16:24, 32:24, 48:23, 54:12, 59:12, 68:16, 73:25, 74:6, 77:17 statements [1] - 74:8 stereotype [1] - 101:11 step [1] - 46:25 Stephen [1] - 77:9 STEPHEN [1] - 1:3 stipulated [1] - 4:2 STIPULATION [1] - 4:1 Stock [13] - 8:15, 8:22, 9:4, 9:17, 20:8, 20:11, 23:14, 23:25, 44:3, 45:8, 69:16, 70:2, 70:20 Stoltenburg [2] - 51:4, 82:19	Stoltz [22] - 10:2, 12:17, 12:22, 12:24, 13:25, 14:4, 14:14, 14:22, 15:5, 26:7, 30:8, 42:6, 44:25, 45:4, 64:16, 64:20, 64:21, 65:5, 68:17, 74:2, 74:6, 74:9 Stoltz's [1] - 15:4 stonewalling [1] - 16:13 stood [2] - 50:21, 51:5 stop [3] - 17:12, 52:5, 91:25 stopped [2] - 52:1, 52:17 Street [3] - 1:19, 2:4, 2:9 strike [1] - 95:5 strong [1] - 48:13 Strong [2] - 71:22, 73:23 struck [2] - 91:2, 91:4 students [2] - 11:17, 12:5 subject [2] - 5:5, 54:3 submitted [1] - 94:1 subscribe [1] - 60:5 subsequently [1] - 101:11 substantial [1] - 58:1 succeed [1] - 81:5 succeeded [1] - 83:13 success [1] - 81:4 successful [1] - 29:21 suggest [2] - 53:10, 67:17 suggesting [1] - 38:18 suit [2] - 82:10, 83:16 summary [1] - 56:24 summer [1] - 15:5 sun [2] - 78:25, 80:3 Sunday [2] - 27:3, 96:25 Sunshine [19] - 8:3, 54:15, 58:21, 59:7, 59:11, 59:20, 63:1, 63:8, 63:16, 63:22, 64:2, 82:1, 82:7, 82:11, 84:23, 85:3, 93:16, 95:13, 100:10 sunshine [2] - 78:3, 78:22 superintendent [2] - 27:21, 91:3 supervision [2] - 101:12, 101:16 supplemental [1] - 86:24 supposed [1] - 41:17	surgery [3] - 6:22, 7:15, 21:3 Surgery [1] - 7:14 surprised [2] - 78:2, 78:21 surprises [2] - 27:10, 64:25 suspend [3] - 17:12, 92:4, 92:25 suspended [1] - 92:15 suspension [1] - 92:21 sworn [1] - 4:12 sworn/affirmed [1] - 101:8	Thomas [9] - 1:14, 4:16, 4:21, 35:25, 50:20, 82:25, 88:16, 88:19, 90:19 Thomas' [1] - 35:10 threatened [1] - 78:25 threatening [1] - 87:18 three [2] - 47:4, 94:23 throw [1] - 68:15 throwing [1] - 13:8 Thursday [3] - 34:9, 50:11, 96:23 ticket [4] - 79:14, 79:15, 79:16, 80:1 Tierney [21] - 17:5, 24:6, 30:24, 31:8, 47:19, 49:20, 51:3, 51:14, 54:6, 54:10, 54:16, 55:19, 55:22, 56:12, 60:1, 67:8, 73:6, 89:1, 89:23, 90:11 TIME [1] - 1:17 tipped [1] - 54:10 tippling [4] - 16:15, 16:16, 56:12, 89:4 titles [1] - 20:13 TO [2] - 3:1, 3:6 today [1] - 5:23 Todd [2] - 13:3, 74:9 together [4] - 21:6, 45:4, 84:9, 91:22 tone [1] - 34:19 Tony [2] - 82:21, 82:22 took [3] - 15:9, 69:6, 77:2 tooth [1] - 41:24 top [3] - 20:4, 43:3, 91:17 topic [1] - 14:13 total [2] - 18:4, 74:12 totally [1] - 25:24 touch [1] - 85:7 toward [1] - 88:4 town [1] - 12:20 track [1] - 55:1 training [9] - 8:2, 8:7, 8:13, 11:13, 11:19, 12:11, 64:5, 100:11 transcript [2] - 5:22, 14:11 transition [7] - 34:2, 34:6, 34:17, 40:24, 41:2, 41:18, 45:19 transitioning [2] - 40:20, 66:24 translate [1] - 80:15 treasurer [1] - 79:9 trial [2] - 4:8, 73:8
---	---	---	---	--

T

table [1] - 14:16
TAKEN [1] - 1:15
tampons [1] - 11:23
Tara [7] - 77:11, 79:12, 79:17, 80:12, 81:22, 85:12, 87:14
TARA [1] - 1:4
target [1] - 51:17
tasks [1] - 70:3
taught [1] - 38:10
teaching [2] - 11:13, 12:4
team [5] - 21:3, 70:20, 70:22, 81:4, 81:5
tech [1] - 21:5
tentacles [1] - 85:7
tenure [1] - 65:2
term [2] - 8:11, 8:12
terminate [2] - 44:3, 45:8
testified [3] - 4:12, 14:14, 93:24
testify [1] - 101:8
testimony [2] - 4:11, 66:5
tethered [1] - 78:15
Thad [1] - 75:18
Thaddeus [2] - 75:3, 75:13
THE [7] - 1:1, 1:9, 47:8, 47:12, 54:8, 54:25, 57:6
themselves [3] - 15:25, 50:23, 71:11
Theresa's [1] - 19:20
thinking [2] - 39:11, 49:25
thinks [1] - 38:23
Third [1] - 2:9
third [1] - 40:13
THOMAS [3] - 1:9, 3:7, 4:10

tried ^[1] - 91:8 Trone ^[9] - 30:23, 31:7, 31:21, 47:18, 48:13, 49:21, 51:14, 53:15, 84:14 true ^[3] - 69:20, 83:5, 101:12 truly ^[3] - 38:5, 38:24, 41:5 trust ^[4] - 25:19, 69:2, 98:2, 98:3 trusted ^[10] - 24:25, 25:17, 25:18, 38:24, 66:4, 66:8, 66:10, 66:18, 68:23, 69:7 truth ^[2] - 5:8, 101:8 try ^[1] - 65:5 trying ^[9] - 14:15, 16:17, 28:19, 29:11, 35:6, 37:25, 61:18, 73:3, 81:3 Tucker ^[7] - 21:25, 43:11, 44:9, 45:9, 46:12, 53:24, 69:11 Tuesday ^[1] - 50:11 turn ^[1] - 13:7 turned ^[1] - 54:18 two ^[17] - 8:11, 10:15, 11:3, 13:1, 13:16, 36:12, 36:13, 36:16, 50:13, 59:24, 74:8, 74:10, 79:2, 82:14, 88:8, 100:2 two-year ^[1] - 8:11 type ^[4] - 19:15, 61:13, 70:21, 81:3 types ^[1] - 79:23	90:5, 101:15 unpleasant ^[1] - 83:13 unrest ^[2] - 12:19, 14:5 unsolicited ^[1] - 65:22 unusual ^[1] - 97:11 unvarnished ^[1] - 48:23 up ^[27] - 14:14, 17:9, 21:1, 25:2, 26:19, 30:16, 31:25, 39:15, 48:19, 51:21, 55:11, 61:11, 62:11, 62:15, 68:18, 70:12, 73:3, 74:1, 74:22, 75:5, 75:19, 81:7, 82:5, 90:15, 90:22 upcoming ^[5] - 35:24, 42:12, 42:22, 43:9, 60:9 update ^[1] - 72:20 UPMC ^[1] - 6:21 upset ^[3] - 11:25, 12:12, 83:11 upsetting ^[1] - 37:11 utilize ^[1] - 10:25	volatile ^[2] - 29:9 volume ^[2] - 9:3, 62:4 vote ^[37] - 17:11, 26:20, 37:21, 38:8, 38:9, 38:11, 38:13, 38:14, 38:15, 40:21, 41:13, 46:20, 62:23, 63:21, 64:4, 64:8, 65:7, 65:9, 65:10, 67:16, 67:22, 91:18, 91:25, 92:1, 92:4, 94:6, 95:2, 95:4, 95:17, 95:21, 95:25, 96:4, 98:21, 99:13, 99:16, 99:20 voted ^[10] - 30:22, 53:8, 69:10, 77:16, 91:20, 91:23, 93:18, 94:10, 96:21, 98:20 votes ^[2] - 86:12, 96:7 voting ^[3] - 94:15, 94:16, 98:22 VS ^[1] - 1:7	Woloshin ^[1] - 1:18 WOLOSHIN ^[1] - 2:3 won ^[7] - 79:16, 82:19, 82:25, 83:1 wondering ^[5] - 55:13, 73:2, 76:8, 76:11, 90:12 word ^[7] - 12:19, 15:1, 27:24, 29:10, 29:11, 38:3, 49:22 wording ^[5] - 9:15, 25:23, 31:19, 32:4, 36:9 words ^[5] - 13:12, 17:1, 46:5, 46:8, 59:9 world ^[1] - 33:2 write ^[6] - 33:9, 33:10, 35:18, 41:5, 41:6, 76:20 writing ^[3] - 35:19, 67:7, 83:3 written ^[6] - 5:21, 57:16, 68:17, 74:8, 74:10, 93:25 wrongdoing ^[1] - 73:13 wrote ^[8] - 35:21, 37:22, 56:24, 74:1, 74:5, 76:22, 89:23 WSSD ^[2] - 43:3, 43:7 WSSD_000045 ^[1] - 3:9 WSSD_000046 ^[1] - 3:9	yourself ^[1] - 22:1
U ultimately ^[1] - 82:9 umm ^[5] - 30:10, 45:10, 46:24, 49:17, 71:9 unbecoming ^[1] - 79:23 uncommon ^[3] - 97:4, 98:25, 99:11 under ^[4] - 5:4, 68:15, 101:12, 101:16 undercurrents ^[1] - 71:15 underhanded ^[1] - 65:4 understood ^[1] - 5:16 unhappy ^[1] - 56:2 Unified ^[1] - 84:3 United ^[5] - 79:3, 79:7, 83:19, 84:3, 84:11 unless ^[3] - 37:15,	V vagina ^[1] - 11:24 value ^[2] - 69:7, 87:20 vampire ^[7] - 78:3, 78:6, 78:24, 79:24, 80:2, 84:21, 87:13 various ^[1] - 55:9 vast ^[1] - 58:12 venomous ^[2] - 49:21, 49:22 venture ^[1] - 81:8 verbal ^[1] - 5:24 verbalize ^[1] - 16:19 verbally ^[1] - 36:21 verify ^[1] - 58:7 version ^[1] - 89:13 versus ^[1] - 82:9 vested ^[1] - 19:21 vice ^[1] - 26:14 video ^[1] - 86:25 view ^[2] - 80:14, 81:23 views ^[1] - 99:9 violate ^[2] - 59:6, 63:22 violated ^[5] - 59:19, 63:1, 63:16, 82:7, 84:22 violation ^[6] - 54:15, 58:20, 59:10, 64:4, 85:2, 86:2 VIVIER ^[1] - 1:5 Vivier ^[1] - 77:12	W wait ^[2] - 41:15, 42:25 waiting ^[1] - 97:5 waived ^[1] - 4:6 walk ^[1] - 27:13 walked ^[3] - 50:24, 60:19, 74:18 walking ^[3] - 50:10, 78:9, 78:12 watch ^[1] - 98:24 water ^[1] - 47:9 wealth ^[1] - 28:5 wear ^[1] - 54:13 website ^[1] - 85:14 Wednesday ^[3] - 1:16, 55:23, 55:25 week ^[3] - 51:1, 96:23, 97:11 weekend ^[2] - 31:25, 48:19 welcome ^[2] - 61:20, 64:13 West ^[8] - 7:12, 77:14, 79:4, 79:7, 84:2, 84:11, 90:20 WEST ^[1] - 1:9 wherewithal ^[1] - 20:16 Whye ^[1] - 14:24 wife ^[1] - 19:20 willing ^[1] - 68:15 win ^[2] - 72:21, 81:9 WITNESS ^[5] - 47:8, 47:12, 54:8, 54:25, 57:6	X x-ray ^[1] - 21:5	Y year ^[6] - 8:11, 8:12, 23:18, 71:11, 81:5, 83:12 years ^[10] - 7:11, 7:13, 7:23, 9:18, 10:3, 13:16, 23:13, 24:11, 27:5, 50:13 yelled ^[2] - 31:24, 53:15 yellow ^[1] - 54:13 Yocumtown ^[1] - 77:23 YORK ^[1] - 1:1 York ^[13] - 1:19, 1:23, 2:4, 4:21, 54:10, 56:13, 59:24, 60:6, 78:8, 80:7, 80:24, 85:13, 89:14