

IN THE COURT OF COMMON PLEAS OF
YORK COUNTY, PENNSYLVANIA

Stephen Beaver, Leah Cooper,) Civil Action - Law
Amy Elliott, John Elliott,) No. 2024-SU-001322
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: Kelly Brent
TAKEN BY: Plaintiffs
DATE: Tuesday, January 28, 2025
TIME: 9:34 a.m.
PLACE: Ream, Carr, Markey, Woloshin &
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14 ALSO PRESENT:

15 Jeff Harmon
16 Tara High
17 Brenda Cox
18 Mandy Davis

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1 INDEX TO DEPONENT

2	EXAMINATION	PAGE
3	By Mr. Elliott	4, 132
4	By Mr. Bonn	124

5

6 INDEX TO EXHIBITS

7	BRENT EXHIBIT	PAGE
8	1: Proposed Timeline for Release of Legal	
9	RFP & West Shore School District Request	
10	for Proposals for Legal Services -	
11	Bates WSSD_000372 through WSSD_000374	25
12	2: Phone Records 02/16 to 03/15/2024 -	
13	Bates WSSD_000700 through WSSD_000702	59
14	3: Phone Records 03/16 to 04/15/2024 -	
15	Bates WSSD_000729 through WSSD_000738	59
16	4: E-mail Exchange Re: West Shore School	
17	District -	
18	Bates WSSD_000010 through WSSD_000011	89
19	5: E-mail Exchange Re: West Shore School	
20	District - no Bates	91
21	6: E-mail Exchange Re: Business Agenda	
22	Bates WSSD_000001 through WSSD_000004	91
23	7: 04/11/2024 Meeting Minutes -	
24	Bates WSSD_000331 through WSSD_000347	101
25	8: E-mail Exchange Re: Legal Services RFP	
	Planning Notes -	
	Bates WSSD_000199 through WSSD_000201	105
	9: Affirmative Action Statement of Policy -	
	Bates WSSD_000382	107
	10: E-mail Exchange Re: Solicitor -	
	Bates WSSD_000177 through WSSD_000179	113
	11: Page 10 from the Answer and New Matter	119

1 STIPULATION

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

9 * * * *

10 KELLY BRENT,
11 called upon by Plaintiffs to give testimony, being
12 duly sworn or affirmed by me, testified as follows:

13 * * * *

14 EXAMINATION

15 BY MR. ELLIOTT:

16 Q. Good morning, Ms. Brent. My name is
17 John Elliott. As I believe you know, I
18 represent the Plaintiffs in this matter.

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

21 A. Kelly Brent. Do I have to say my
22 address?

23 MR. BONN: I think it is already part
24 of the pleadings.

25 MR. ELLIOTT: I think it is.

1 THE DEPONENT: Okay. 501 Brenneman
2 Drive, Lewisberry, 17339.

3 BY MR. ELLIOTT:

4 Q. Have you ever given a deposition?

5 A. I have.

6 Q. In what context?

7 A. It was a wrongful termination case.

8 Q. How were you involved in that case?

9 A. My husband and I owned the company
10 that it was -- that was the complaint was made.

11 Q. Okay. So, were you one of the
12 defendants?

13 A. I was.

14 Q. Is that the only time you have ever
15 given a deposition, was in that case?

16 A. Yes.

17 Q. You are represented here today by
18 Attorney Josh Bonn, correct?

19 A. Correct.

20 Q. Obviously I am sure he has -- you have
21 had a chance to talk about what goes on at a
22 deposition, but I want to take a moment just to
23 kind of go over the ground rules of the
24 deposition.

25 Obviously you have been placed under

1 oath, subject to the penalties of perjury just
2 as though we were in court in front of a judge.
3 Your duty is to tell the truth to the best of
4 your recollection.

5 I need to ask you questions that you
6 can hear and understand. If at any time you
7 don't hear one of my questions or don't
8 understand, please ask me to repeat it or
9 rephrase it and I'll try to do that so you
10 understand it.

11 Otherwise, if you answer a question we
12 will presume that you have heard and understood
13 the question.

14 Do you understand those rules?

15 A. I do.

16 Q. What we are saying is going to be
17 taken down by the stenographer and placed in the
18 written transcript, so all of your responses
19 will need to be verbal. The steno has a
20 difficult time recording nods of the head and
21 gestures and so forth.

22 Do you understand that?

23 A. Yes.

24 Q. If at any time you need to take a
25 break or you need to consult with your attorney,

1 let me know. We can do that. It is not
2 necessarily a marathon session.

3 Do you have any questions about that
4 procedure before we begin?

5 A. No.

6 Q. What is your educational background?

7 A. I went to Bald Eagle Nittany High
8 School, I graduated in 1982. I went to the
9 Central Pennsylvania College and graduated with
10 a degree in allied health in 1984. I continued
11 my education at Penn State, but before I was
12 done I got pregnant with my son so I have --
13 that is incomplete.

14 I earned my teaching certificate and
15 taught at Central Penn College for two or three
16 years.

17 Q. Okay. What did you teach?

18 A. I taught transcription, administrative
19 procedures, advanced transcription. So, there
20 was intro, Trans II, and then advanced, and
21 administrative procedures and two other types of
22 classes. I don't remember what they are, but
23 they were all in medical administration. And I
24 was a proctor for the certification process for
25 transcriptionists.

1 Q. What time range were you employed --
2 where was that again? What college?

3 A. Central Penn.

4 Q. Central Penn?

5 A. Yeah.

6 Q. How long were you employed in that
7 capacity?

8 A. I think about two to three years.

9 Q. Okay. And was that -- what time frame
10 was that?

11 A. '93 to '95, is my best guess.

12 Q. All right. Other than that, what
13 other -- what is your employment history?

14 A. I am self-employed.

15 Q. Okay. How are you self-employed?

16 A. I own a transcription company.

17 Q. What is that called?

18 A. DocuScript.

19 Q. How long have you -- are you the sole
20 owner? Or is this the one you said that you run
21 with your husband?

22 A. I am the sole owner.

23 Q. How long have you been self-employed?

24 A. 1987.

25 Q. And that continues through the

1 present?

2 A. Yes.

3 Q. Okay. So, between '93 to '95, were
4 you also self-employed? Or was there an
5 interruption where you --

6 A. I was self-employed.

7 Q. Okay. Was DocuScript the defendant in
8 the wrongful termination matter that you were
9 referring earlier?

10 A. No.

11 Q. What company was that? Or what
12 business was that where you were involved in the
13 wrongful termination matter?

14 MR. BONN: I mean, how is this
15 relevant to whether there was a Sunshine Act
16 violation?

17 THE DEPONENT: Right.

18 MR. ELLIOTT: Well, I am just
19 confirming your employment history. You said
20 this was the only employment you had from 1987
21 to the present, but you were involved, you said,
22 as an owner in another business. I want to
23 confirm that. I am not going to get into the
24 details of it.

25 THE DEPONENT: I would prefer not to

1 answer the question because I don't think it is
2 relevant to what happened in the Sunshine Act
3 supposed violation. That was my life before.

4 MR. ELLIOTT: Well, I understand. But
5 we are allowed to inquire into your employment
6 history, particularly as to depositions that you
7 have taken in the past and how it relates, and
8 also to clarify a statement that I don't --

9 (Deponent conferred with counsel.)

10 MR. BONN: The concern is that Ms.
11 Brent is involved in a private business that had
12 legal matters that has nothing to do with
13 whether or not there was a Sunshine Act
14 violation and there is anticipation these
15 transcripts will be available to the public.

16 So, we are objecting to the relevance
17 of the details of that private lawsuit.

18 BY MR. ELLIOTT:

19 Q. Okay. Without getting into the
20 details, your self-employment at DocuScript was
21 not the only employment, you were involved with
22 another business as well?

23 A. I helped my husband, yes.

24 Q. Okay. For now we'll move on.

25 When were you elected to the school

1 board?

2 A. In November of 2023.

3 Q. Okay. So, your term began in January
4 of 2024?

5 A. In December of 2023.

6 Q. In December, okay. Did you have any
7 prior experience serving on any municipal or
8 government boards or agencies prior to that?

9 A. I did.

10 Q. What experience did you have?

11 A. I was the recording secretary.

12 Q. Who were you the recording secretary
13 for?

14 A. Cumberland County Republican
15 Committee.

16 Q. What were the duties of the recording
17 secretary for that?

18 A. To record the meeting.

19 Q. Was that the only municipal or
20 government order agency experience you had?

21 A. Municipal or government, yes.

22 Q. In connection with either that or your
23 private bids, did you have experience in dealing
24 with budgets for large organizations?

25 A. Define large.

1 Q. Let me -- other -- let me rephrase the
2 question.

3 Other than your own personal finances,
4 did you have any experience dealing with or
5 creating budgets for any other organization?

6 A. Define organization.

7 Q. Any -- either any municipal,
8 government organization, or a private business.

9 A. Yes.

10 Q. What experience did you have?

11 A. I manage all of the money for
12 DocuScript. And I helped my husband with some
13 of the accounting over COVID. When COVID was a
14 thing, people couldn't come in. I worked with a
15 woman that we hired as a CFO. We worked
16 together briefly. But, again, that is private.

17 Q. Have you had any trainings related to
18 the Sunshine Act and/or the right-to-know law?

19 A. Yes.

20 Q. What training have you had?

21 A. We had to -- it is required by the
22 PSBA that we take their training, which involves
23 Sunshine information. I did do that. I have
24 that certificate that I completed.

25 And then on January 30, 2024, Mrs.

1 Say, along with one of her colleagues, hosted a
2 Sunshine training workshop at the Ace Building,
3 and I attended that in person. So, I had two.

4 Q. The PSBA training, was that in person
5 or was that virtual? Or how was that --

6 A. It was virtual. It was five hours
7 with a break in-between.

8 Q. In approximately January of 2024, the
9 notion of a request for proposal or RFP for
10 legal services was raised during a board
11 meeting.

12 What prompted that? What was the need
13 for an RFP?

14 A. We -- we had just lost a lawsuit where
15 we had to settle, West Shore School District,
16 and the settlement was \$40,000 due to a
17 constitutional matter. And the community was
18 angry and we were elected in part to look at
19 that and ensure it doesn't continue to happen.

20 Q. So, you think that the former
21 solicitor was responsible somehow for getting
22 the district embroiled in that lawsuit?

23 A. I am not 100 percent sure. We were
24 trying to figure it out.

25 Q. Okay. Just, what was that lawsuit?

1 Do you know the name or the docket number of
2 that?

3 A. I don't know the docket number.

4 Q. Okay. Do you know who the plaintiff
5 was?

6 A. I do, but it is confidential. She
7 doesn't want the information out.

8 Q. Was there a complaint filed in court?
9 Or was the allegation brought and settled
10 completely outside of court?

11 A. I think it was brought in court. But
12 I am not 100 percent sure.

13 Q. Was there any other reason for --
14 well, let me back-up.

15 Who among the board was the first to
16 suggest there should be an RFP to explore a new
17 solicitor?

18 A. Probably Mrs. Thomas.

19 Q. Okay.

20 A. But I can't say for sure.

21 Q. Do you remember how that was brought
22 up?

23 A. No.

24 Q. How did you first hear about an idea
25 to potentially look into changing solicitors?

1 A. It was actually brought up by people
2 in the community, people who were taxpayers.

3 Q. Okay. How -- when you say that was
4 brought up, how so? How was that communicated
5 to you?

6 A. That we lost a lawsuit and the
7 settlement was \$40,000 and there was, according
8 to constituents, a mass mishandling of the masks
9 within the school over COVID.

10 Q. Okay. If this was private, how did
11 these constituents know there was a \$40,000
12 settlement?

13 A. Because one of the constituents is one
14 of the parties that talked to me.

15 Q. Okay. What was Ms. -- when you say
16 people expressed concern about mishandling masks
17 in connection with COVID, how was that
18 mishandled?

19 A. They were requiring a mask mandate for
20 the kids, for the students.

21 Q. Who was mandating that?

22 A. It is my understanding it was the
23 board.

24 Q. All right. And do you know if that
25 was mandated due to requirements from the

1 Department of Health? Or was this something
2 they were doing completely on their own
3 voluntarily?

4 A. I don't know. But I do know
5 Cumberland Valley was not requiring mask
6 mandates. So, by comparison, we do have some
7 regional comparisons.

8 Q. Other than the lawsuit settlement and
9 the COVID mask mandate, was there any other
10 reason stated for exploring an RFP or otherwise
11 a dissatisfaction with either Brooke Say or
12 Stock and Leader as the solicitor?

13 A. Mrs. Thomas had a lot of difficulty
14 with Stock and Leader.

15 Q. What kind of difficulty did she have?

16 A. She doesn't go into great detail.

17 Q. Well, what details did she give you?
18 What did she mean by difficulty?

19 A. The lawsuit and the mistreatment of
20 Mrs. Thomas in her first tenure of two years.

21 Q. How was she mistreated?

22 A. She was mistreated by the entire board
23 and administration and Mrs. Say.

24 Q. But specifically how did that
25 mistreatment manifest itself? How was she

1 mistreated?

2 A. You'll have to ask Mrs. Thomas. I
3 wasn't there.

4 Q. So, how are you aware of the
5 mistreatment? Did Ms. Thomas tell you about it?

6 A. She said they treated her terribly.
7 And I am not sure the word terribly is the right
8 word. But Mrs. Thomas, again, will have your
9 answer.

10 Q. All right. Were you ever -- do you
11 believe you were ever mistreated by either Ms.
12 Say or anyone at Stock and Leader in any way?

13 A. There is passive. So, I would say
14 yes.

15 Q. How so? What do you mean by that?

16 A. Umm, Dr. Stoltz and Ryan Argot were to
17 disseminate the RFP, just so we can speak about
18 it, putting it out into the Sunshine. And it so
19 happens there was also a moment where Dr. Stoltz
20 made derogatory commentary regarding two of our
21 board members, where he was specifically told by
22 the board not to say those remarks. And we told
23 Brooke that we don't want him saying those
24 remarks.

25 And Brooke did not defend the board.

1 And, so, Dr. Stoltz came out of the meeting and
2 in public made a public statement that was
3 untrue about a meeting that happened and false
4 statements were made that painted two of our
5 board members in a negative light that was not
6 true. He later admitted to me that he regrets
7 making those comments. But, nonetheless, he
8 made them at that time.

9 Q. Okay. What were his comments?

10 A. You can listen to them in the meeting.
11 I couldn't tell you specifically.

12 Q. Okay. What -- sitting here today,
13 what is your recollection of the comments, or
14 the gist of them?

15 A. That two of the board members attended
16 a curriculum meeting regarding an outside entity
17 that had come into our school district to teach
18 the Know and Grow program, and a parent wanted
19 to see it. And Mr. Gay was not getting back to
20 the parent and allowing the parent to see it for
21 approximately two months, which is outside our
22 policy.

23 Our policy has deadlines where these
24 things have to be done. And, so, our board
25 members took the lead, they set up a meeting

1 with Byrnes Group, B-Y-R-N-E-S Group, and they
2 had a meeting with the parent where Mrs. Thomas
3 and Mrs. Cox attended. And Mr. Gay was also in
4 attendance, the assistant superintendent.

5 And Mr. Gay said things had happened
6 in that meeting, that according to Mrs. Thomas
7 and Mrs. Cox, did not happen the way Mr. Gay
8 stated. And, so, Dr. Stoltz notified us and
9 made a statement -- he didn't ask, but he made a
10 statement that he is going to say the following
11 statement. And it had the words -- let's see --
12 lack of decorum, and unprofessional behavior, I
13 believe. But, again, this is all in the
14 meeting. You can go back and look.

15 And we objected strongly to him making
16 that statement, that it wasn't true, and that he
17 wasn't present in the meeting to be able to even
18 make that statement. He didn't know what
19 happened in that meeting. It was all hearsay.

20 So, he came out and he made a
21 statement against the board members when we told
22 him not to. And Mrs. Say did not stop him.

23 Q. And --

24 A. So, we had no protection.

25 Q. The board members you are talking

1 about, was that Ms. Thomas and Ms. Cox? Or was
2 that someone else?

3 A. Yes.

4 Q. Do you remember which meeting Dr.
5 Stoltz made these statements -- made that
6 statement?

7 A. I believe it was 2/15. But, again --

8 Q. February 15?

9 A. Yes.

10 Q. It sounded like -- did you have
11 advance notice that he planned to make this
12 statement prior to the meeting?

13 A. No.

14 Q. Was that statement -- okay. If I
15 heard you correctly, you wanted Ms. Say to
16 instruct Dr. Stoltz not to make that statement?

17 A. Correct. Because it didn't happen.

18 Q. All right. How did -- how would Ms.
19 Say have known that Dr. Stoltz planned to make a
20 statement at the meeting?

21 A. Because he announced he was going to
22 do it in executive session.

23 Q. Okay. So, you had a little bit of --

24 A. We had about maybe 10 minutes of lead
25 time to know even that was going to happen.

1 Q. Right. This was an executive session
2 that occurred a few minutes before public --

3 A. Right. Correct. And we did tell Mrs.
4 Say that he cannot say those things about us.
5 And on the org chart, he is under the board.
6 So, he was out of us a little bit.

7 Q. And -- all right. If I asked this
8 already, I apologize.

9 Did you personally have any -- let me
10 back-up, because I don't know -- you said you
11 had what you called passive difficulty with Ms.
12 Say; is that correct?

13 A. Sure. That is an example. She didn't
14 do something we instructed her to do.

15 Q. Okay. Are there any other examples of
16 that, other than the Dr. Stoltz instance?

17 A. There are other examples, but I can't
18 recall them off the top of my head. I would
19 have to go back and see the meetings.

20 Q. So, other than the lawsuit, COVID
21 masks, the issue with Dr. Stoltz making a
22 statement, is there anything else specifically
23 you can remember that you believe warranted
24 changing the solicitor?

25 A. Yes.

1 Q. Okay. What would that be?

2 A. So, in real business, an RFP should be
3 issued every three or four years for services
4 like this. I know that my services are only
5 good for a three- to five-year contract. And
6 after that is over, you have to rebid with your
7 competitors.

8 But she had before with the school
9 board for 12 years and she has never been rebid.
10 It just continues to be re-upped. And she was
11 -- and that is just -- that is not the way
12 business practice work in the world that I live
13 in. And I do put out RFPs, I respond to them.
14 And it is bad business practice to not re-
15 evaluate costs and what any competitors might
16 have to offer. We could have landed back on
17 Stock and Leader, but it still needed to be
18 re-examined.

19 Q. So, from your perspective, as a good
20 business practice, you need to periodically
21 examine your performance against other potential
22 competitors?

23 A. Yeah. It is best business practice.

24 Q. Okay. And there -- at some point
25 there was an RFP committee formed to look into

1 this on behalf of the board; is that correct?

2 A. Yes. I formed that committee. It was
3 just a loose committee. It wasn't super formal.

4 Q. I think the responses to the discovery
5 refer to that as an ad hoc committee?

6 A. Mm-hmm.

7 Q. Would that be accurate?

8 A. That is safe to say.

9 Q. All right. Do you recall when you --
10 you said you formed it. Do you recall when
11 specifically that was?

12 A. I think that was either 2/8 or 2/15.

13 Q. Okay. That is either February 8 or
14 February 15?

15 A. Yeah.

16 Q. Who else was on the committee?

17 A. I asked who would like to be on the
18 committee, and Mr. Guistwhite wanted to be on it,
19 Ms. Tierney wanted to be on it, Mr. Brinton
20 wanted to be on it, and I was on it.

21 Q. Okay. I take it because this was an
22 ad hoc committee, there were no official minutes
23 taken of your meetings; is that correct?

24 A. I don't think so, no.

25 Q. How often did the committee meet?

1 A. We met twice.

2 Q. Do you remember what dates that was --
3 those were, excuse me?

4 A. I would have my notes, but I don't
5 know off the top of my head. It would have been
6 -- it probably would have been early March and
7 maybe mid March. I think there was a March 15
8 meeting.

9 Q. Okay. What was discussed during those
10 meetings?

11 A. I brought an RFP, like a template, and
12 disseminated that out to the members of the ad
13 hoc committee, the four of us. And we discussed
14 what should be removed from the template and
15 maybe some things that should be added to the
16 template.

17 Q. Okay. Where did you get the template?

18 A. I made it myself.

19 Q. Just from scratch? Or did you use
20 anything else as a basis for that?

21 A. Yes. So, I used probably 10 different
22 school districts around Pennsylvania in the
23 Third Circuit Court, and I used the RFPs that
24 they had posted on their website.

25 Q. Okay.

1 A. So, I was able to Google those and
2 look at the dates. And in many ways they
3 overlapped. They were just redundant if you
4 would -- but for those things that were
5 different, I added those in. And the RFP would
6 have been pretty heavy, and it really was meant
7 to just really guide us back.

8 But it had everything in it that the
9 other school districts were putting in their
10 RFPs. So, I just provided that, then we dialed
11 it back a little bit and added to it. Mrs.
12 Tierney added a couple things.

13 Q. All right. Did you incorporate
14 anything from previous RFPs from West Shore?

15 A. No. It was 12 years old, or 13 or 14
16 years old at that point. I felt it was
17 antiquated.

18 Q. So, you had specifically looked at it
19 but didn't include it because you thought it was
20 antiquated?

21 A. Yes. It was just old.

22 (Brent Exhibit 1 marked for
23 identification.)

24 BY MR. ELLIOTT:

25 Q. I'll give you the one I specifically

1 marked. It is the same one I showed your
2 attorney.

3 A. Sure.

4 Q. First of all, I am showing you what we
5 marked as Exhibit 1, and this is marked on the
6 bottom-right corner, just for information
7 purposes from discovery, as Pages 372 through
8 374 of West Shore's document production.

9 Just take a moment to look at this
10 document and tell me if you recognize it.

11 A. Is he talking about this or this?

12 Q. All three pages I am showing you.

13 A. I definitely don't recognize this
14 page.

15 Q. Are you talking about what looks like
16 essentially a blank page?

17 A. Yeah.

18 Q. No. 373?

19 A. Mm-hmm.

20 Q. Okay.

21 A. This looks vaguely familiar. It might
22 look similar to something. And then -- yes,
23 this looks vaguely familiar. But, again, I
24 haven't looked at this in a year. Let's just
25 say it looks vaguely familiar.

1 Q. Okay. Let's start with the first
2 page, which says proposed timeline for release
3 of legal RFP, and it looks like there is some
4 dates.

5 Is this a document that was prepared
6 as part of the ad hoc RFP committee?

7 A. I don't know whether it was prepared,
8 I don't know whether it was the old one. I
9 don't know.

10 Q. It sets forth a number of, looks like,
11 target dates for how the RFP process was to
12 proceed.

13 Is that an accurate summary of what
14 the committee hoped would be the target dates
15 for releasing the RFP?

16 A. Yes.

17 Q. There is obviously some handwritten
18 notes on the first and third page.

19 A. Mm-hmm.

20 Q. Do you know whose handwriting that is?

21 A. Looks like Brian's.

22 Q. You think Brian probably made those
23 notes?

24 A. I don't know.

25 Q. But it is not yours?

1 A. No.

2 Q. So, based on the work that the
3 committee did in its two meetings, do you
4 believe the RFP process was on pace to meet the
5 deadlines that are set forth in the proposed
6 timeline?

7 A. No.

8 Q. Why not?

9 A. The RFP committee had morphed from
10 Brent, Tierney, Brinton, Guistwhite, to then
11 include the superintendent and the assistant
12 superintendent. And then it was growing larger
13 than that. So -- and then at this particular
14 time Mr. Brinton had been hospitalized toward
15 the second meeting.

16 Q. Okay. So, how did the -- when you say
17 the committee started to include members of the
18 school administrative staff --

19 A. Correct.

20 Q. -- who specifically was that?

21 A. Dr. Stoltz, Mr. Gay, and in the second
22 meeting when Mr. Brinton was hospitalized, Mr.
23 Guistwhite wanted to add all cabinet members.
24 And I disagreed with that.

25 Q. Why did Mr. Guistwhite want to add

1 cabinet members?

2 A. He said -- very aggressively by the
3 way. So, elbows slammed on the table, right up
4 in your face, he said, don't you think these
5 folks have a say? They are the ones working
6 with the solicitor. And the committee was no
7 longer the committee that we formed.

8 Again, Mr. Brinton was no longer
9 available.

10 Q. So, how -- why did you object to input
11 from members of the staff?

12 A. The way the business typically moves
13 in West Shore is that administration brings
14 forth a recommendation of whatever they want
15 done, then the board passes it or it doesn't.
16 But as this was a fairly sensitive topic and
17 things were -- we had the superintendent making
18 disparaging remarks about us to the press, it
19 was important that we felt we had a say as well.
20 And I felt like our say was being usurped,
21 maybe.

22 Q. What disparaging remarks did the
23 superintendent say to the press?

24 A. That Mrs. Cox and Mrs. Thomas lacked
25 the decorum that he would expect of board

1 members, in his press release from the Byrnes
2 Group meeting. And he was told not to say
3 those. And we told our solicitor we were not
4 okay with that.

5 And Dr. Stoltz works under the board,
6 and he was not in attendance for that meeting.
7 So, people that work for us are taking pock
8 shots at us that were not real.

9 Q. What did -- did Dr. Stoltz indicate
10 what behavior specifically showed a lack of
11 decorum?

12 A. He wouldn't specify.

13 Q. Okay. Was there anyone else at that
14 meeting you talked to who did specify?

15 A. I was not in attendance for that
16 meeting.

17 Q. Was there anyone who was in attendance
18 at that meeting who talked to you about it?

19 A. Yes.

20 Q. What did -- who did you speak to?

21 A. Mrs. Cox and Mrs. Thomas.

22 Q. Okay. And did they tell you what
23 behavior they were supposedly being accused of
24 that was showing a lack of decorum?

25 A. They said it didn't happen.

1 Q. Okay. But they didn't specify what
2 the allegation was they supposedly did that
3 didn't happen?

4 A. A lack of professionalism and a lack
5 of decorum is what Dr. Stoltz said.

6 Q. Right.

7 A. Mrs. Thomas and Mrs. Cox said that did
8 not happen at all. And then Dr. Stoltz came out
9 and made a press statement to include that
10 language to the press, which, of course, was
11 there.

12 Q. Okay. The meeting -- this was the
13 meeting with the Byrnes Group?

14 A. Yes.

15 Q. Who was present at that meeting?

16 A. A parent, a representative of the
17 Byrnes Group, Mr. Gay, and our two board
18 members. And I don't know beyond that.

19 Q. So, you indicated that you thought the
20 ad hoc RFP committee was changing to the point
21 that it was not the same committee that you
22 envisioned when it was formed; is that accurate?

23 A. That's correct. And there was no
24 discussion with myself or Mr. Brinton about it.
25 It was changing with no discussion.

1 Q. All right. When you say it was
2 changing, was that a -- was that Mr. Guistwhite's
3 request that staff should be included? Or did
4 he somehow invite them without asking you? How
5 were -- how was the committee itself changing?

6 A. I would say Mr. Guistwhite and Mrs.
7 Tierney were starting to include people that I
8 didn't even know from the cabinet yet.

9 Q. When you say --

10 A. But without discussion.

11 Q. Okay. When you say including others,
12 how were they included?

13 A. They hadn't been included yet. He was
14 just telling me that is the way it was going to
15 be.

16 Q. They were telling you they wanted
17 these people to be included?

18 A. They should be included.

19 Q. That they should be?

20 A. Yes.

21 Q. But that had not happened yet --

22 A. No.

23 Q. -- at that time?

24 A. But Dr. Stoltz was in it, and so was
25 Mr. Gay. And they were not part of the

1 committee, either.

2 Q. So, was -- so I understand.

3 Mr. Guistwhite and Ms. Tierney were
4 saying they wanted to include Dr. Stoltz and Mr.
5 Gay? Or they were already part of this somehow?

6 A. They came to the meetings without my
7 knowing it. And we all sat down and I thought,
8 this is interesting. This is not the committee.
9 Okay.

10 Q. When they were at the meeting, did
11 they -- were they just observing? Or did they
12 participate? How -- what was their role or
13 conduct at the meeting?

14 A. I would say they were -- I would say
15 participating in a small measure. But, yeah,
16 participating.

17 Q. Did they do anything that was
18 disruptive somehow to the progress of the
19 committee?

20 A. No.

21 Q. Did they offer any suggestions or
22 input to the -- to the RFP?

23 A. I don't recall.

24 Q. All right. To the extent that Dr.
25 Stoltz and Mr. Gay participated in the RFP

1 process, did they do anything that you believe
2 was negatively impacting the process?

3 A. No.

4 Q. Okay. Your -- am I correct that your
5 disagreement with Mr. Guistwhite, Ms. Tierney,
6 concerned their desire to add or bring in more
7 people or more input to the committee from other
8 staff in addition?

9 A. It wasn't discussed. And I think if I
10 were to have added someone, I would have
11 discussed it with the committee that was formed
12 of four people.

13 So, you just -- suddenly the committee
14 was growing. And that was also going to slow
15 the process down. Then we would not have been
16 able to make the timeline.

17 Q. Okay. But I think you said these
18 people had not actually been added to the
19 committee yet?

20 A. Maybe they had been. I don't know. I
21 didn't invite them to sit in the room.

22 Q. Were any -- other than Dr. Stoltz and
23 Mr. Gay, were any of these other outside
24 administrative persons present at any of the RFP
25 meetings?

1 A. I don't think so, but I can't be sure.

2 Q. Do you know if any of them gave any
3 direct input into the process at that point?

4 A. No. That was the last -- as of the
5 second meeting with Mr. Brinton not being able
6 to attend, and the aggression, the physical and
7 vocal aggression of Mr. Guistwhite, I was not
8 going to attend another meeting like that.

9 Q. And that was -- this occurred at the
10 second meeting in March?

11 A. Yes.

12 Q. That was also the last meeting that
13 the RFP committee got together?

14 A. Absolutely, yep.

15 Q. So, was it your decision not to
16 continue with the RFP process?

17 A. It was my -- can you reform the
18 question, please?

19 Q. I asked, was it your decision to
20 either stop the RFP process or for the committee
21 to stop meeting?

22 A. I made the decision for myself that I
23 was not going to sit alone in another meeting
24 while Mr. Guistwhite was so aggressive with his
25 language and his body language. He would slam

1 his elbows down on the table and tell me the way
2 things should be, according to him.

3 And I was alone in there. I didn't
4 have a cohort with me, Mr. Brinton. And I just
5 -- it was absolutely -- it was mean, it was over
6 the top, it was disrespectful. And I made the
7 personal decision that I am not going to attend
8 a meeting with him in close quarters ever again.

9 Q. So, was there any sort of formal
10 decision to disband the RFP committee?

11 A. No. But I wasn't going to go to
12 another meeting with him.

13 Q. So, there was never a vote of any kind
14 with regard to stopping or suspending the RFP
15 process?

16 A. Well, there couldn't have been a vote.
17 Mr. Brinton is in the hospital, and it was an
18 exercise in intimidation from Mr. Guistwhite.
19 And I was not -- I did not feel comfortable in
20 that room.

21 Q. All right. Did you tell Mr. Guistwhite
22 that?

23 A. No. I have since told him that.

24 Q. Did you express to any of the other
25 members of the committee your -- those concerns

1 that you had?

2 A. No. I walked out of the building.

3 Q. Okay. But you didn't follow that up
4 with a phone call or an e-mail or anything
5 expressing your frustrations?

6 A. No. The committee, the way I saw it,
7 was sort of an agreement as it was with the four
8 members. That is an agreement.

9 When the committee morphed without any
10 input from David or myself, it violated that
11 agreement. We had a committee of four people,
12 and that is the way it was supposed to be. And
13 suddenly it was growing to people that we don't
14 even know and we wanted to be part of that
15 committee.

16 But we -- as it got bigger, we
17 wouldn't really have had any say in the end.

18 Q. When you say we wouldn't have had any
19 say, what do you mean by that?

20 A. We would have been irrelevant in that
21 meeting.

22 Q. Who is we?

23 A. Mr. Brinton and Kelly.

24 Q. Why do you believe you would have been
25 irrelevant?

1 A. Because there would have been a
2 cabinet, and there would have been board members
3 and high-level administration who would have
4 wanted Mrs. Say to stay. But the things that
5 were happening to us weren't happening to them.

6 Q. All right. But ultimately the board
7 as a whole would have to approve the actual RFP
8 that was submitted to the public and to invite
9 prospective --

10 A. I don't believe --

11 MR. BONN: Objection. Calls for legal
12 conclusion.

13 BY MR. ELLIOTT:

14 Q. What is your understanding -- if the
15 -- when you formed the committee, what was your
16 understanding of how your findings or
17 conclusions would have been presented to the
18 board?

19 A. That the four of us would work
20 together and edit the RFP so that the four of us
21 understood the expectation for the RFP. And
22 when we all agreed, then we would bring it to
23 the full board.

24 Q. All right. And how would getting
25 input from staff have impacted your ability to

1 vote or agree on the final version of the RFP?

2 A. Because of the things that were
3 happening to us from administration itself, we
4 felt that we should also have input. And we
5 believe our input would have been diluted.

6 Q. By we, you are talking about you and
7 Mr. Brinton?

8 A. Yes.

9 Q. Would a diluted version of the RFP
10 been able to be presented to the full board
11 without the approval of you and Mr. Brinton?

12 A. I never said there was a diluted RFP.

13 Q. I think you said you thought your
14 input would be diluted, is that correct?

15 A. I believe it would have been heavy on
16 the needs of administration and probably very --
17 I would say the administration would probably
18 have most say.

19 Q. Did you receive any suggestions or
20 input from the administration that you thought
21 was unreasonable or wrong or should not be
22 included in the RFP?

23 A. No. I don't recall that. I don't
24 think we got that far. At the second meeting I
25 determined that I was not coming back to a

1 meeting with him. We were just shouted at. I
2 was shouted at. David was in the hospital.

3 Q. When you say you were shouted at, are
4 you talking about Brian Guistwhite?

5 A. Yes. He was very aggressive.

6 Q. Was there anyone else you thought was
7 aggressive or shouting at you, other than Mr.
8 Guistwhite?

9 A. No, no. They don't see it as
10 shouting. They see it as passion.

11 Q. I am talking from your perspective.

12 Was there anyone other than Mr.
13 Guistwhite who you thought was acting
14 inappropriately toward you in any way?

15 A. Yes.

16 Q. Who?

17 A. Dr. Stoltz.

18 Q. And how was he showing that?

19 A. He was in agreement with Mr. Guistwhite
20 in his tone. He says he gets his back-up. So,
21 his tone. The meeting was not a good meeting
22 for me. And at some point I just thought I have
23 got to get out of this room.

24 And it was after hours, it was dark.
25 Dr. Stoltz was to my left, Brian Guistwhite was

1 to my right, and there was no David. So -- and
2 this was not the intention of the meeting at
3 all. The meeting was not as advertised and
4 there was no point in continuing down that road.

5 Q. Okay. What was your first contact
6 with Kevin Hall?

7 A. Kevin Hall called my cell phone, and
8 you have the phone records for that. Somewhere
9 in mid March.

10 Q. Did you know him before that?

11 A. I did not know him.

12 Q. Did you know he was going to call you?

13 A. I did not know he was going to call
14 me.

15 Q. So, at that point you didn't know who
16 he was, you never heard his name before?

17 A. Never.

18 Q. So, I think -- was that March 12, I
19 think you said was the first instance that you
20 spoke to him; is that correct?

21 A. It'll be in the phone records. It is
22 the 11th or 12th. So, we can say the 12th. If
23 it is 11th, I mean --

24 Q. Okay. Do you know how he got your
25 phone number?

1 A. I have no idea.

2 Q. So, what did he say to you when he
3 called that day?

4 A. He said, how are things going on the
5 board.

6 Q. Okay. How did you respond?

7 A. I said terrible.

8 Q. Let me back-up. When he -- how did he
9 introduce himself? How did he tell you who he
10 was and why he was calling?

11 A. I think he said, Kelly, I am Kevin
12 Hall from Tucker Arensberg, something like that.
13 I don't know. Just generic introduction.

14 Q. Okay.

15 A. He asked how things were going on the
16 board.

17 Q. All right. Did you wonder why -- did
18 you wonder why he was calling you?

19 A. I did.

20 Q. Okay. So, why did you talk to him
21 about it if that was complete stranger calling
22 you? What made you continue the conversation?

23 A. So, it turns out that the name was
24 vaguely familiar to me in, like, a really vague
25 way. And one of my young ladies who helped in

1 my campaign had given me his business card. But
2 I take all business cards and I throw them in my
3 left drawer of my desk. There are many, and
4 they don't mean anything to me, and I never
5 really source them.

6 But it turns out that Kevin Hall's
7 business card ended up being on the top. And,
8 so, when he said who he was, I thought, you
9 know, I think that is that business card in my
10 desk. So, he mentioned our mutual friend's
11 name, and then I was kind of putting it
12 together.

13 Q. Okay. Who was your mutual friend?

14 A. Elizabeth Gallo.

15 Q. What was that last name again?

16 A. Gallo.

17 Q. Gallo?

18 A. Mm-hmm.

19 Q. G-A-L-L-O-W?

20 A. O.

21 Q. Just O?

22 A. Yeah.

23 Q. G-A-L-L-O. And who is Elizabeth
24 Gallo?

25 A. She is my friend.

1 Q. Did she -- did you say she worked on
2 your election campaign for the school board?

3 A. She just helped me get out and about.

4 Q. How did she know Kevin Hall?

5 A. I have no idea.

6 Q. So, on this initial call he asked you
7 how things were on the board and you said
8 terrible.

9 What happened from there? How did the
10 conversation progress?

11 A. He said, have you found a new
12 solicitor yet, and I said we were in the
13 process. Then he asked me how the process was
14 going, and I said terrible.

15 Q. Did he say why he thought you were
16 looking for a new solicitor?

17 A. Yes. He understands that we attempted
18 to put an RFP on the agenda. We were. But --
19 and he's been watching the meetings, because he
20 is a resident of the school district and he has
21 children. So, he has a particular interest to
22 watch the meetings. So, he understands kind of
23 what's happening.

24 Q. So, how did you find out he was
25 interested in being considered as the solicitor?

1 A. I may have just surmised it. Why
2 would he be calling me otherwise?

3 Q. Okay. So, how did that first call
4 end? Was there any idea that you would be
5 continuing to speak to him?

6 A. Yes.

7 Q. And how did that come up? Or what did
8 you say?

9 A. He said his firm does educational law
10 and he would like an opportunity to talk to me.
11 And, so, after that, I said, where is your
12 office? And he said it is in Camp Hill. And I
13 said, well, I happen to be in Camp Hill, what is
14 the address? He gave me the address. And I
15 said, can you see me right now? I said, I just
16 want to talk to you about what your firm would
17 offer.

18 Q. Okay. Did you end up meeting that
19 day?

20 A. Absolutely.

21 Q. Was it just you and Kevin Hall in this
22 meeting?

23 A. Yes. It was very unplanned until the
24 last second.

25 Q. So, what did you talk about during the

1 meeting?

2 A. Some of what's happening with the RFP
3 process.

4 Q. What did you tell him about what was
5 going on with the RFP process?

6 A. I said that that -- well, I can't
7 speculate what I said, really. I don't recall.
8 I can think of what I might have said, but that
9 is not --

10 Q. What do you remember? To the best of
11 your recollection, what do you remember saying?

12 A. I remember telling him that the
13 initial RFP that we had given to administration
14 to send out in January was, in fact, not sent
15 out when Heidi and I in an agenda-building
16 meeting with Dr. Stoltz and Ryan Argot.

17 I explained to him that administration
18 did not take instruction from the board, they
19 did not send the RFP out to the rest of the
20 board members on the day that they needed to do
21 it in order to have the RFP be in the Sunshine.

22 And according to Mrs. Tierney, she
23 only received the RFP one hour before that board
24 meeting.

25 I think my notes are -- and I might be

1 off by a date. It is easy enough for you to
2 look up.

3 But I believe it was 1/8 that we had
4 the agenda-building meeting, and 1/11 is the
5 date of the school board meeting. And they were
6 to -- they were instructed very clearly by Mrs.
7 Tierney -- by Mrs. Thomas and Mrs. Brent to send
8 this out to the full board so that everyone has
9 an opportunity to see it. And that was never
10 done.

11 Q. All right.

12 A. That was also never told to us that it
13 wasn't done. So, administration was not
14 fulfilling their obligations to the leadership
15 of the board. Then they never told us they
16 didn't do it. So, that is a problem.

17 Q. Okay. Did Mr. Hall have any response
18 to that?

19 A. He said, of course they didn't.

20 Q. Was that his only comment? Did he say
21 anything else about propriety of that process or
22 how it should go?

23 A. No. He recognized the vulnerability
24 with administration not acting on behalf of the
25 board member. The president of the board and

1 the vice president of the board at that time, we
2 understood we needed to give them what we wanted
3 to be on the agenda, and we did give it to them.

4 And without their telling us, they
5 never sent it out. And we didn't know it, and
6 we entered the next meeting being viciously and
7 verbally attacked for withholding the RFP. But
8 we didn't withhold it. It was withheld by
9 administration.

10 Q. Okay.

11 A. And we didn't know it was withheld.
12 So --

13 Q. All right. So, the instruction to the
14 administration that was on approximately January
15 8, for what you can recollect today?

16 A. Mm-hmm.

17 Q. And should have been forwarded at that
18 time so they would have it before -- couple days
19 before the beginning of the month?

20 A. Yes. And we did -- we both.

21 Q. Who specifically in the administration
22 was supposed to have forwarded that out?

23 A. Let's hypothetically say Mr. Argot --
24 or Dr. Argot, who is our secretary. That is who
25 we gave it to.

1 Q. Your recollection is that he was --
2 this was given to Dr. Argot, and he was
3 specifically --

4 A. Scan it, send it.

5 Q. -- asked to scan it and send it out to
6 the full board members?

7 A. Yes.

8 Q. Are you saying that didn't happen at
9 all? Or it didn't happen until --

10 A. I don't know when he sent it out. You
11 could probably do a discovery on that.

12 But Mrs. Tierney said she only
13 received it one hour before the meeting. To the
14 knowledge that Mrs. Thomas and I had, it would
15 have been sent the Tuesday before the Thursday
16 of the meeting. But it was never sent. And we
17 weren't told, hey, we couldn't get that out on
18 time. We would have taken it off the agenda.
19 But it was allowed to be played out in a big
20 drama.

21 Q. Is the normal process, would that have
22 been sent out by e-mail to all of the board
23 members?

24 A. Probably as an attachment.

25 Q. Right. Do you remember receiving that

1 e-mail?

2 A. Hmm-mm. If it really did go out one
3 hour before a board meeting, I would have been
4 in executive session when it went out. So, I
5 wouldn't have gotten it anyway.

6 But I don't know when it went out.
7 That would be an interesting thing for you to
8 look up.

9 Q. Did you -- during this initial meeting
10 on the 12th with Attorney Hall, did you discuss
11 anything else other than the RFP process and the
12 things you just talked about now?

13 A. I don't recall.

14 Q. What -- how were things left at the
15 end of that meeting? Was there going to be any
16 follow-up or further discussion? How did the
17 meeting conclude?

18 A. I think I may have -- I can't really
19 say. I don't remember. So, I don't want to
20 speculate.

21 Q. About how long did that meeting last?

22 A. 10 minutes.

23 Q. Okay.

24 A. It was very brief.

25 Q. Did he give you any information in

1 writing in any way about him or his firm or
2 anything?

3 A. No, no.

4 Q. The discovery responses indicate --
5 and I think this is consistent with the phone
6 logs -- that you spoke with Kevin Hall March 12,
7 14, 15, 17, 25, April 3, 5, 6, and 10.

8 Does that sound about accurate?

9 A. Maybe. If my call logs say it, then
10 that is right.

11 Q. What did you talk about during those
12 subsequent calls?

13 A. Probably his firm's experience with
14 educational law.

15 Q. Do you -- what experience did Kevin
16 Hall himself have with regard to being a school
17 solicitor?

18 A. None.

19 Q. Okay. What did he tell you about his
20 firm's experience?

21 A. He said it is one of their main scopes
22 of work.

23 Q. But is it your understanding that all
24 of those folks who specialize or at least
25 practice in the area of school law were in their

1 Pittsburgh office?

2 A. I don't know. But he did mention many
3 of them were in Pittsburgh.

4 Q. Okay.

5 A. But with, you know, COVID and all the
6 telework, that doesn't really have a great
7 impact on me.

8 Q. So, what convinced you that Kevin Hall
9 was qualified to be the solicitor for the school
10 district?

11 A. I wasn't convinced that he was
12 qualified. He had not done educational law. He
13 was not a school solicitor in his past.

14 Q. Okay. So, at some point during your
15 various conversations, did you convince that he
16 would be a qualified and appropriate solicitor
17 for the school district?

18 A. I was watching the events around us
19 happening with other school board members and
20 administration that were attempting to -- well,
21 I just told Heidi I am not attending another
22 board meeting until I have a personal attorney
23 sitting beside me.

24 Q. When did you tell Ms. Thomas that?

25 A. Probably in early March.

1 Q. So, your --

2 A. So, I was going to hire my own
3 attorney. It would not have been Kevin Hall. I
4 have attorneys.

5 Q. All right. So, when you say you were
6 going to have your own attorney, you were -- you
7 are saying you were intending to bring your own
8 personal attorney to a meeting?

9 A. We had -- when I say we, I mean the
10 new majority. We were being set up and things
11 were happening around us that did not make any
12 sense, like a superintendent who was critical of
13 board members to the press when we tell him not
14 to do it.

15 And it felt to me like we were being
16 sabotaged from within. And if you go back and
17 watch the meetings as I have, you will find that
18 other board members who were not our friends
19 were chronically using the word Sunshine, just
20 like that in all the meetings. I went through
21 my Sunshine paperwork. We never violated
22 Sunshine. But the board members themselves were
23 shouting the word out. And, so, I just felt
24 like I wasn't going to attend another meeting
25 without representation.

1 Q. Okay. When you say -- you used the
2 words you said you felt set up and sabotaged.

3 A. Oh, sure.

4 Q. Other than the instance where you say
5 Dr. Stoltz made the -- what you characterized as
6 the disparaging statements against Ms. Thomas
7 and Ms. Cox, were there any other instances
8 specifically that you felt set up or sabotaged?

9 A. The RFP process. They didn't release
10 the RFP when we told them to. And we didn't
11 know that. That kept that from us as well.
12 They had no intention of releasing it on time.
13 And we were not told it would not go out.

14 Q. All right. Was there any --

15 A. By disparaging, I mean untruthful.
16 Dr. Stoltz was not only disparaging, but the
17 remarks were untrue. So, they are now lying to
18 the press. Dr. Stoltz is lying to the press
19 about members of the board who keeps him
20 employed.

21 The constituents are at the top, and
22 we represent those constituents. And Dr. Stoltz
23 works under the board. And him coming out and
24 making a false statement that made our board
25 members look bad regarding a meeting that he

1 didn't even attend himself, and he did it anyway
2 even though we told Mrs. Say he is not allowed
3 to make that statement.

4 Q. Okay.

5 A. That kind of thing was happening all
6 the time. We had no representation on that
7 board. Mrs. Say did not represent five of us,
8 but she represented her friends.

9 Q. Did you ever specifically ask Dr.
10 Argot for an explanation of why the RFP was not
11 sent out in a timely manner the way he was
12 instructed?

13 A. Why would I ask him?

14 Q. Well, did you want to find out why
15 that -- didn't you want to find out why that
16 happened?

17 A. The damage was done. The damage was
18 done.

19 Q. Do you know if it was on purpose or he
20 just -- was it an accident?

21 A. There were many accidental on purposes
22 happening to us at that time.

23 Q. Is it your position that Dr. Argot
24 intentionally failed to do that in a timely
25 manner for the purpose of making you look bad

1 essentially?

2 A. Absolutely.

3 Q. Why do you believe he did that on
4 purpose?

5 A. Because he is very smart. And if he
6 wanted to do that, he could. And he wouldn't
7 have overlooked it. And administration was
8 working against us at that time.

9 Q. All right. When you say the
10 administration was working against you, how were
11 they working against you?

12 A. I have just told you two perfect
13 examples.

14 Q. Okay. Are there any other examples
15 other than those two you were talking about?

16 A. I would say some condescending tone
17 from Mr. Sanders about -- in the way he would
18 speak to us in meetings and talk down to us.

19 So, a for example would be, I asked
20 Mr. Sanders how much do we pay our bus drivers.
21 It is easy, right? Just a number. Mr. Sanders'
22 response was, you have to understand that these
23 bus drivers drive around a metal box with 70
24 kids in it. I am still not given a number. And
25 he went on for several minutes about the

1 complications of driving a metal box with
2 children in it.

3 And when he was done, I said, I just
4 want a number. And he -- I think somebody else
5 jumped in with a number. But he didn't answer
6 the question. He just told me something silly.
7 He didn't want to answer the question because he
8 huff and had puffed and was aggravated the
9 entire time.

10 So, that is administration, too. I
11 just wanted to know, is it \$20 an hour? Is it
12 \$24 an hour? How much do they make? But I did
13 not get an answer. I got a lecture about how
14 the school bus works.

15 That is administration not helping us.
16 And that was going on all the time.

17 Q. Do you remember any other specific
18 examples of the administration either not
19 helping or undermining you?

20 A. I would probably have to go through my
21 notes. I know other board members have other
22 things to say.

23 Just those alone are a big deal. They
24 are a big deal.

25 Q. Did any of the other board members

1 tell you about experiences they had that you
2 weren't aware of, that the administration had
3 done?

4 A. I believe so, but I couldn't recount
5 what they are off the top of my head. I had my
6 own problems at that time, trying to figure out
7 what in the world is going on in this district.

8 Q. Actually, I think this last discussion
9 started with me asking you whether you believe
10 -- you ultimately came to the conclusion you
11 believed that Kevin Hall was qualified to be the
12 school solicitor.

13 Did you come to that --

14 A. No, I didn't say that. No.

15 Q. No, I asked you that. Did you ever
16 come to a conclusion that Kevin Hall was
17 qualified to be the school solicitor?

18 A. I would say his firm was qualified.
19 And perhaps he was qualified. But --

20 Q. So, as of April 11 -- the April 11
21 meeting, you had not been personally satisfied
22 that he individually was qualified to be a
23 school solicitor?

24 A. I just have to up my parking. If you
25 could give me a second.

1 Q. That is fine. Do you need a break?

2 A. No. I just need a moment to add to my
3 parking.

4 (Pause.)

5 MR. ELLIOTT: Why don't we go off the
6 record and take a break for a few minutes.

7 (A recess was taken from 11:07 a.m.
8 until 11:17 a.m.)

9 MR. ELLIOTT: Just as a housekeeping
10 matter. I skipped over a couple documents I
11 just want to mark for the record.

12 (Brent Exhibits 2 and 3 marked for
13 identification.)

14 BY MR. ELLIOTT:

15 Q. I am giving you what we marked as
16 Exhibits Nos. 2 and 3.

17 A. Okay.

18 Q. These are marked for identification
19 purposes as WSSD 700 through 702 and 729 through
20 739.

21 Take a look at these. Would you agree
22 that these are excerpts from your Verizon
23 telephone records that were provided through
24 discovery?

25 A. Yes.

1 Q. Okay.

2 A. There is a phone number on here that
3 is not part of the lawsuit.

4 Q. Okay. Which one is that?

5 A. 4173. Page 1.

6 Q. Okay. Take a moment. If you see any
7 other numbers that perhaps should have been
8 redacted that aren't part of the lawsuit.

9 A. I really don't know everyone's phone
10 number off the top of my head. So, but -- okay.
11 I do know some numbers off the top of my head.
12 That is not one you would have. Okay.

13 Q. In general, looking at Nos. 2 and 3
14 though, do you agree this accurately represents
15 your phone logs that you provided to your
16 attorney to turn over in discovery?

17 A. Yes.

18 Q. Okay. To the extent that it shows a
19 phone number and a length of the call, that
20 accurately represents a call that you either
21 made or was incoming and it took approximately
22 the amount of time listed on the call log?

23 A. Yeah.

24 Q. Okay. And the calls to the 991.8793
25 number, those calls are either to or from Kevin

1 Hall?

2 A. I don't know his phone number.

3 Q. Okay.

4 A. Is that his phone number?

5 Q. I'll show you what I was given as part
6 of discovery. We won't mark it. But a list of
7 board numbers. And there was a couple numbers
8 that look like they were associated with Kevin
9 Hall.

10 A. Can I write on this?

11 Q. Could you -- not on the one that we
12 have marked. But if you need another copy --

13 A. No, that is okay. I can put it on my
14 notebook. I don't know Kevin's phone number.

15 If you say that is his phone number
16 and you are in agreement, then I'll say yes,
17 that is his phone number.

18 Q. I don't know. I am going based off
19 what I was provided in discovery. I don't have
20 any independent knowledge.

21 Based on this, it appears to be
22 991.8793 would be a phone number for Kevin Hall.

23 Do you have a reason to think that is
24 inaccurate?

25 A. No, hmm-mm.

1 Q. Going back to our last line of
2 questioning before we went on a break.

3 I asked you if at any point prior to
4 April 11 if you came to the conclusion that
5 Kevin Hall was qualified to be the solicitor for
6 the school district.

7 Did you ever personally come to that
8 conclusion?

9 A. Not necessarily.

10 Q. You understood he would be the person
11 who would be primarily attending the meetings on
12 behalf of Tucker Arensberg, correct?

13 A. If that would happen, yes.

14 Q. If he was to be hired --

15 A. Yeah. But there was a long way to go
16 before that would happen.

17 Q. On the evening of April 11, you cast a
18 vote. Were you -- at that point when you cast
19 your vote, were you satisfied that he was
20 qualified to sit in the monthly meetings and
21 give the board accurate legal advice?

22 A. Yes.

23 Q. What do you believe qualified him to
24 do so?

25 A. I believed that with his firm's

1 experience and the things that were happening to
2 us through no fault of our own by other board
3 members and administration, he would be better
4 for the newly-elected members who were not being
5 represented and who were being attacked, and who
6 were being set up to look like they weren't
7 doing their job when they were.

8 And Mrs. Say was not acting on behalf
9 of new members, in addition to the other four.
10 And, so, this was after I concluded that I would
11 need an attorney for myself, because of the
12 things that were happening.

13 Q. Is it fair to say it was a priority
14 for you for the new solicitor to be someone who
15 would do what the board majority wanted and to
16 look out for the board majority?

17 A. No.

18 Q. Okay.

19 A. That is not a fair statement at all.

20 Q. What were the most important qualities
21 that the new solicitor should have, in your
22 opinion?

23 A. The new solicitor would have to work
24 for all nine members of the board, and the
25 school district as a top priority. All nine

1 members. Not four members. Not old
2 friendships. But all nine members of the board.

3 Q. Can you -- you have given an example
4 that Ms. Say did not stop Dr. Stoltz from making
5 the false statement that you have described.

6 Are there any instances where you
7 believe Attorney Say was not representing the
8 full board, but only looking out for the four
9 minority members that you say she had
10 friendships with?

11 A. There are other examples that perhaps
12 other school board members can discuss with you.

13 Q. Okay. You don't have any personal
14 ones yourself that you can recall?

15 A. Let me think about that for a moment.

16 Q. Sure. Take your time.

17 A. There are many, but I just don't know
18 if I can recall them.

19 There was an interaction between Mrs.
20 Say and Mrs. Thomas that I found disturbing.

21 Q. What happened?

22 A. We were about to start a private
23 meeting in the executive session room a half an
24 hour before executive session started. And, so,
25 the meeting started at 5:00. And at 5:01 --

1 again, this was a private meeting for us to
2 understand a few things that were up and coming
3 on the agenda.

4 At 5:01 Dr. Stoltz entered the room
5 with his laptop, and he sat to our right in the
6 executive session room. I thought Mrs. Thomas
7 must have invited him. I didn't know why he was
8 there. And at 5:03, which I wrote down, Dr.
9 Argot also came in the room and he sat to our
10 left. And he opened up his laptop.

11 And they both sat with their elbows on
12 the table and stared at what was supposed to be
13 a private meeting with just Mrs. Thomas and
14 myself and Mrs. Say.

15 I later asked Mrs. Thomas if she had
16 invited them, and she said no. And Brooke Say
17 said if you are uncomfortable with them present,
18 we can always move to the hallway to have our
19 discussion. So, I said, yes, I am uncomfortable
20 with this. And, so, Heidi changed the topics of
21 discussion and we proceeded with a quiet.

22 But Mrs. Say took that opportunity
23 right before that meeting started to apologize
24 to Mrs. Thomas for her mistreatment of her
25 during her first two years on the board. And

1 she apologized also on behalf of administration
2 and on behalf of the other board members, that
3 the treatment of Mrs. Thomas was despicable and
4 she was very sorry as a Christian woman that she
5 should have done more to protect Mrs. Thomas.

6 And she understood what Mrs. Thomas
7 has been through because she witnessed it, and
8 that she knows that administration has treated
9 her terribly. And she explained that she was
10 educated in a Mennonite church, school of faith,
11 faith-based school, and she knew that the
12 treatment of her was wrong. And anything that
13 she had done in the past to not help Mrs. Thomas
14 she was very sorry for.

15 Q. These were statements that Brooke Say
16 made to Mrs. Thomas?

17 A. Mrs. Thomas. And you can ask Mrs.
18 Thomas more specifically if she can remember
19 more details. But it was alarming to me.

20 Q. Do you remember when this meeting was
21 taking place?

22 A. It was in January.

23 Q. In January, okay. A meeting --

24 A. Would have been very early on.

25 Q. Right. And Ms. Say made these

1 statements, was this during that -- what was
2 supposed to be the private meeting before the
3 executive session?

4 A. It was right before the private
5 meeting. Right before Dr. Stoltz and Dr. Argot
6 came in and stared at us.

7 Q. All right. Did --

8 A. In what I was expecting to be a
9 private meeting.

10 Q. Do you know what conduct occurred -- I
11 realize you weren't on the board. But did you
12 hear or do you have an understanding of what
13 conduct happened to Ms. Thomas that she was
14 talking about that was despicable or should have
15 stopped?

16 A. Mrs. Thomas had told me about those
17 things. But I wasn't sure -- like, I didn't
18 witness it myself. But the apology from Mrs.
19 Say was very revealing.

20 Q. Okay. But you don't know specifically
21 what specific conduct she was apologizing either
22 for herself or on behalf of the administration
23 at that point?

24 A. No. She was just begging for
25 forgiveness, really. It was sad.

1 Q. When -- during your meetings with --
2 your conversations and meetings with Attorney
3 Hall prior to April 11, 2024, did you talk about
4 any policy goals the school board had, or
5 anything you thought on behalf of the district
6 that the board wanted to achieve?

7 A. No, I don't think so.

8 Q. Okay. Do you know if Attorney Hall is
9 associated with any political organizations?

10 A. I have no idea.

11 Q. You don't know if he is a member of
12 any political action committees or --

13 A. I really have no idea.

14 Q. You didn't discuss that with him in
15 any of your calls or meetings?

16 A. No.

17 Q. Okay. You never had any discussion
18 about the PA economic growth PAC with Attorney
19 Hall at any time?

20 A. No.

21 Q. The Independence Law Center, did that
22 topic ever come up?

23 A. No.

24 Q. Prior to the April 11 meeting, did you
25 interview or speak to any other attorneys for

1 the potential solicitor position?

2 A. No.

3 Q. Why not?

4 A. I didn't seek out Kevin, and I

5 wouldn't seek out anybody else.

6 Q. Okay. I think you indicated as part

7 of the RFP process, that was begun in part out

8 of best business practices --

9 A. Yes.

10 Q. -- to attempt to --

11 A. That's right.

12 Q. -- compare other -- other options than

13 what you had?

14 A. Correct. And pricing.

15 Q. Okay. So, why didn't you think it was

16 important to find out other options and pricing

17 for other attorneys other than Kevin Hall and

18 Tucker Arensberg?

19 A. Those things would have been very

20 important, except that we were being set up by

21 administration to the press, and the press was

22 writing articles about us, painting us in a

23 negative light. And that was -- and they were

24 telling untruths or making suppositions about

25 us.

1 And that was an emergency, as far as I
2 was concerned. We were now having an emergency.

3 Q. Okay.

4 A. I can speak only for myself.
5 Certainly I thought it was extremely urgent.
6 But I can only speak for myself.

7 Q. Okay. What -- can you give me an
8 example of some untruths that were reported in
9 the press that you are referring to?

10 A. I didn't reprint any of that out.
11 So --

12 Q. From your -- do you recall just from
13 your own memory? I mean, you indicated this was
14 bad enough you thought it was an emergency.

15 What sort of things were being
16 reported that you thought were untrue?

17 A. That we have conduct unbecoming board
18 members. And we know that was untrue. And Dr.
19 Stoltz stated that and he knew the press would
20 be in the building. We didn't know the press
21 was going to be there that night. But Dr.
22 Stoltz did.

23 And Dr. Stoltz used that opportunity
24 to say something disparaging when we told him
25 not to do it, which is insubordination

1 technically. But he seemed not to care.

2 Q. So, am I hearing you correctly that
3 the reason from your perspective that you did
4 not follow through with the RFP process and did
5 not seek out any other interviews or information
6 from other potential attorneys was that you
7 thought it was an emergency to hire someone at
8 that time immediately?

9 A. Dr. Guistwhite had been aggressive with
10 me in a meeting. He is barking at me about how
11 he demands things be done on a committee that he
12 didn't form.

13 While I don't have my cohort with me,
14 his elbows are on the table, he is leaning
15 forward. You may watch the meetings, because it
16 happens plenty in the meetings. It was very
17 hot. And I don't allow anybody to treat me like
18 that. That is a boundary. If you want to treat
19 me like that, we are not communicating.

20 Boundary. Nobody is treating me like that.

21 I was done with him because that is a
22 boundary. His treatment of me was intentionally
23 intimidating and very nasty. He raised his
24 voice, he -- he just was unprofessional in the
25 extreme.

1 So, with that, and then Dr. Stoltz
2 coming out and saying ugly things about us and
3 us telling him not to, and Brooke Say not
4 stopping that process, every single meeting was
5 a disaster. Nobody took us seriously. Nobody
6 cared. Except our constituents, of course.
7 They cared.

8 Q. So, what gave you confidence that
9 would change if Kevin Hall was the solicitor?

10 A. I didn't have -- it is not that I was
11 confident. Nothing could be worse than the
12 position we were in. We did not have anyone
13 protecting us against administration. That was
14 proven. Administration was actively working
15 against us, and Mrs. Say, even though we asked
16 her to help us, would not.

17 So, Mr. Hall was simply better than
18 Mrs. Say was going to be, because she would --
19 he would represent hopefully all nine members of
20 the board, and not just the four experienced
21 friend members of the board. And hopefully Mr.
22 Hall would stop the negative commentary to the
23 press, which was not honest. It was dishonest.
24 We needed a solicitor who represented all nine
25 members of the board, and we needed it then.

1 Q. Were all nine members of the board
2 given an opportunity to speak to Kevin Hall
3 prior to his -- prior to the vote on April 11?

4 A. I have no idea. I was the vice
5 president of the board at that time, not the
6 president.

7 Q. Did you personally speak to either --
8 any of those four members about Kevin Hall prior
9 to the April 11 meeting?

10 A. Yes.

11 Q. Who did you speak to?

12 A. I spoke to Heidi, Mandy. And I think
13 I exchanged contact information of someone else,
14 but I didn't speak with them about that.

15 Q. Okay. Did you -- at any time prior to
16 the April 11 meeting, did you talk to Abigail
17 Tierney about Kevin Hall?

18 A. I don't think so.

19 Q. At any time prior to that meeting did
20 you speak to Adam Trone about Kevin Hall?

21 A. I don't think so. And if I could just
22 go back to Mrs. Tierney.

23 Mrs. Tierney made a personal threat --
24 or threat to me on the way out of executive
25 session, which she denies, that had something

1 specific to do with the RFP.

2 Q. What threat did she make?

3 A. She told me that if I tried an RFP
4 again, that I would get burned. And then when I
5 asked her about that, she said was anyone
6 present? Do you have any witnesses? We were
7 the last two walking out of the room. And said,
8 of course not, Abby. There were no witnesses.
9 She said I don't even speak like that. And I
10 said, but you did do it. And she said I don't
11 recall. She did do it.

12 Q. Okay.

13 A. If you do another RFP, you will get
14 burned. And it was, like, a real extended word.
15 And it was absolutely a threat. But she denies
16 it. So, this is the life in the West Shore
17 School Board.

18 Q. When did that occur?

19 A. That was in January. It was right
20 after we brought the first RFP, which was not
21 disseminated in time, it was right then. It was
22 after that meeting.

23 Q. So --

24 A. I am happy to lie detector that one as
25 well.

1 Q. Did you -- we were -- I think my last
2 question was, had you spoken to Adam Trone
3 prior to the 11th, and I think you said no, you
4 don't --

5 A. No. Adam Trone was terribly nasty to
6 me. And, again, it is a personal boundary.
7 Those folks don't get in.

8 Q. Did you speak to Mr. Kambic prior to
9 April 11 about Kevin Hall or the fact that you
10 were talking to him about being the solicitor?

11 A. I can't recall.

12 Q. And what about Mr. Guistwhite?

13 A. No. He is a boundary. He is too
14 aggressive and too nasty. And his body language
15 is also very aggressive. So, I am not talking
16 to Mr. Guistwhite.

17 Q. So, who did you call or have meeting
18 with -- meetings with among the other board
19 members to talk about Kevin Hall and whether he
20 should be the next solicitor?

21 A. Mandy.

22 Q. Okay.

23 A. It is worth noting at the time that
24 Mrs. Davis was physically sick from the stress
25 that was being caused to her in the board and in

1 the board meetings. She can -- she may or may
2 not give you more specifics. But she was
3 actually very sick.

4 Q. Okay. What makes you believe that was
5 a result of something happening at the board
6 meetings?

7 A. She told me.

8 Q. What did she say specifically?

9 A. You can talk to her about that. That
10 is confidential. That is private.

11 Q. What did she say to you specifically?

12 A. She says, I can't keep doing this. I
13 am very sick.

14 MR. BONN: Somebody knocked on your
15 door.

16 (Discussion off the record.)

17 MR. ELLIOTT: Sorry about that.

18 BY MR. ELLIOTT:

19 Q. What did Ms. Davis tell you about that
20 condition?

21 A. The amount of stress, the amount of
22 gaslighting, our inability to function as a full
23 board was causing extreme stress and she was
24 physically ill.

25 Q. Okay. When -- did you have an in-

1 person meeting with Ms. Davis and/or Mr. Hall?

2 A. Yes.

3 Q. When did that occur?

4 A. I don't know the date.

5 Q. Okay. Where did it occur?

6 A. At Mr. Hall's office.

7 Q. And was it only the three of you
8 present at that meeting?

9 A. Yes.

10 Q. What did you discuss?

11 A. I didn't discuss anything. I just sat
12 there.

13 Q. Okay. Do you know if this was the
14 first time Ms. Davis was having any contact with
15 Mr. Hall?

16 A. I don't know.

17 Q. What did the two of them talk about?

18 A. I don't think I was paying attention.
19 I was probably on my phone.

20 Q. How long did that meeting last?

21 A. I have no idea.

22 Q. Were you there -- were you in the same
23 room the whole time?

24 A. I think so.

25 Q. You don't remember how long it took,

1 approximately?

2 A. I really don't.

3 Q. Did you -- other than that meeting,
4 did you ever speak to Ms. Davis again on the
5 telephone about Attorney Hall?

6 A. I don't think so.

7 You should also know her children do
8 yardwork for me. So, we would be back and forth
9 in the friend zone very often.

10 Q. Okay. So, at any time prior to the
11 April 11 meeting, did you discuss Attorney Hall
12 with Mandy Davis?

13 A. I don't recall. We discuss a lot of
14 things. We discussed all of the items on the
15 agenda, questions about contracts, ways to do
16 things better.

17 There are lots of conversations that
18 go back and forth that have nothing to do with
19 anything else.

20 Q. Did you have any calls or meetings
21 with Brenda Cox about Attorney Hall?

22 A. I may have talked to Brenda about it.
23 If I did, it would have been very brief. Like,
24 I don't remember. But, possibly.

25 So, I can't say for sure. I don't

1 remember.

2 Q. What about David Brinton? Did you
3 have any discussion -- any either calls or
4 meetings with David Brinton relating to Attorney
5 Hall before April 11, 2024?

6 A. I can't recall specifically. This is
7 the time where Mr. Brinton was becoming very
8 ill. And we were on the phone talking about
9 hospital visitation. He needed a couple items
10 for me to pick up and take over to the hospital
11 in Enola.

12 There were a lot of phone calls back
13 and forth that had nothing do with anything. He
14 was sick. But he may not have been hospitalized
15 yet. But he was very sick.

16 Q. Did you ever attend an in-person
17 meeting with any board member, other than Ms.
18 Davis?

19 A. Ms. Thomas.

20 Q. Sorry, Ms. Thomas?

21 A. I think so.

22 Q. Okay. And when did that meeting
23 occur?

24 A. I couldn't tell you.

25 Q. Was Attorney Hall at that meeting?

1 A. Yes.

2 Q. Okay. What was discussed at that
3 meeting?

4 A. I don't know. Possibly
5 qualifications. I don't know. I have no idea.

6 Q. Were you participating in the
7 discussions?

8 A. Not so much.

9 Q. Why were you there?

10 A. Because she is the president and I am
11 the vice president. She was also attempting to
12 mentor me, which was nice.

13 Q. How was that meeting arranged?

14 A. I don't know.

15 Q. Who set it up?

16 A. I have no idea. I don't recollect.

17 Q. During any of your communications with
18 other board members prior to April 11, did any
19 of them express to you an opinion about Attorney
20 Hall in any way?

21 A. Say the question again in another way.

22 Q. Yeah. Prior to April 11, during any
23 of your communications that you had with other
24 board members concerning Attorney Hall, did any
25 of them give an opinion about him, about his

1 qualifications, whether he would be a good
2 solicitor, anything of that nature?

3 A. No. Not that I can recall.

4 Q. Were you aware of how any of them were
5 going to vote on April 11?

6 A. No.

7 Q. Was Heidi Thomas aware of how people
8 were going to vote on April 11?

9 A. Heidi Thomas never polls the board.
10 That is one thing I have learned about her. She
11 always says, vote your conscience. So, she -- I
12 don't think so. That is not the way she
13 operates.

14 Q. Okay. How was it that the potential
15 vote was placed on the agenda for April 11?

16 A. I have no idea. It was probably an
17 agenda-building meeting. So, it would have been
18 in an agenda-building meeting. And that would
19 have been attended by myself and Mrs. Thomas and
20 administration. I think. That is how it would
21 go.

22 Q. And did you attend an agenda meeting
23 where that was discussed?

24 A. I don't remember it, but I have
25 attended to many meetings that I just can't

1 recall all of them. I don't remember it
2 specifically.

3 Q. How far in advance of the board
4 meetings does the agenda meeting typically take
5 place?

6 A. Two days. Two or three. The meetings
7 take place on a Thursday, so it will either
8 happen on a Monday or Tuesday, due to making
9 sure that the agenda is placed in the Sunshine
10 on the website in time to notify parents of the
11 meeting -- parents and citizens of the meeting.

12 Q. Okay. So, you don't specifically
13 recall if you were at the meeting where the
14 agenda item was discussed to be placed on the
15 agenda for the April 11 meeting?

16 A. I don't -- I really cannot recall it
17 specifically. I have attended so many of those
18 meetings, so many other types of meetings that
19 you can't recall everything. It is not
20 possible.

21 Q. Okay. And there was never an
22 executive session held prior to April 11 where
23 Kevin Hall was discussed as potentially being
24 the next solicitor, was there?

25 A. I don't think so.

1 Q. Prior to April 11, there was never any
2 public meeting where Kevin Hall or the potential
3 of him to be the next solicitor was discussed?

4 A. I don't recall.

5 Q. Do you know why there wasn't an
6 executive session scheduled to discuss that
7 prior to the 11th?

8 A. You know what, maybe there was. You
9 are going to have to -- you'll be interviewing
10 other people.

11 I think it may have been discussed the
12 night that it was on the agenda that it was
13 going to be in the meeting. I can't -- I can't
14 specifically remember. But it may have come up
15 in executive session before the actual meeting,
16 which happens an hour later.

17 Q. Right. The executive session would
18 have been on the 11th?

19 A. Yes. It could have come up there.

20 Q. So, when did you know that Kevin Hall
21 was going to be appointed as the solicitor?

22 A. I didn't know that he was going to be
23 appointed. I knew after a vote.

24 Q. When did you personally decide that
25 you were going to vote in favor of him?

1 A. I am not really sure. I knew after --
2 so, there is a note that I have here on the 2/15
3 PR press release from Dr. Stoltz, that was the
4 moment that I realized that even though we were
5 doing good work, we were working with our
6 constituents, we were very professional and
7 helping our constituents with curriculum
8 transparency, that even with the hard work that
9 we were doing, Dr. Stoltz was going to say
10 something ugly in the press and turn a perfectly
11 fine meeting into something that it was not.

12 And Mrs. Say was not going to stop it,
13 even though we told her it didn't -- that was
14 not the way it happened. Have him hold that so
15 we can have a discussion with him.

16 It all happened so fast. It was at
17 that point, 2/15, that is when I thought, I am
18 not coming to another meeting without my
19 personal attorney present. Because this
20 administration is making us out to be ignorant
21 and monsters, which we are not.

22 Q. Okay.

23 A. It goes to the press, the press writes
24 an ugly story, and now our constituents think we
25 are doing things wrong, which we are not. This

1 is willful and knowingly on the part of
2 administration.

3 They brought the press out. We didn't
4 know press was going to be there. But Dr.
5 Stoltz was prepared for a press release that --
6 where he was going to say the things that were
7 untrue. We were not okay. That was 2/15.

8 Q. So, did you end up bringing your own
9 personal attorney to any of the meetings in
10 March or April?

11 A. I didn't. I talked with my husband
12 about it, and I just thought, you know what,
13 I'll keep my nose down and we'll see what
14 happens.

15 Q. You are saying you are not sure when
16 you decided that you were going to vote for him?

17 A. I am not sure when I decided I was
18 going to vote for him. But the press release of
19 2/15 was a turning point.

20 Q. You mentioned that a couple times.
21 You said that was a turning point. Is that --
22 would you say that is the biggest motivation for
23 you to make sure that you got a new solicitor in
24 there who would -- you know, who would look
25 after the rights of the majority?

1 A. For all nine members.

2 Q. For all nine members?

3 A. All nine members.

4 Q. How did you know that Attorney Hall
5 would be working for all nine members if four of
6 those members never got a chance to meet or
7 speak to him prior to the meeting on the 11th?

8 A. Well, they didn't have a history, they
9 didn't have a good battering, different -- I
10 viewed him as being the first neutral spot for
11 all of us.

12 Q. You viewed it that way. How do you
13 know everybody else would view him as neutral?

14 A. I didn't. And they could have voted
15 no.

16 Q. How does it comport with best business
17 practices to have selected a new solicitor
18 without comparing him with any other potential
19 possibilities?

20 A. Best business practices was probably
21 the second priority after having representation
22 for all members of the board at that point.

23 Q. Why couldn't this progress in a way
24 that you could meet both of those priorities?

25 A. Because the administration was

1 actively lying to the press, and the press was
2 telling false stories based on the lies from the
3 superintendent to the press that magically
4 appeared the night even we didn't know the press
5 would be there.

6 We were being actively worked against
7 by administration the whole entire time. And
8 they did not have the right to do the things
9 that they did. That can't continue.

10 Q. But you would agree that selecting a
11 solicitor is an important long-term prospect for
12 the school district, correct? It is important
13 that you have the right person over the long
14 haul?

15 A. Define long haul.

16 Q. For more than a few weeks or months.
17 Something that could potentially be for years.

18 A. In our policy, we can replace the
19 solicitor at will. So, if anybody were to vote
20 for him, it could have been very temporary. But
21 it would have been better than the nothing we
22 were getting out of Mrs. Say.

23 Q. Okay. So, if that is the case, why
24 haven't you gone through the RFP process at any
25 time since April 11?

1 A. I don't have any problems right now.
2 The things that were happening to us have slowed
3 significantly.

4 Q. How do you know that Tucker Arensberg
5 is giving you the best possible value for the
6 taxpayers' money, compared to other possible
7 solicitors that could have been hired?

8 A. There has been discussions about May
9 and possibly putting together another RFP. But
10 I don't think that has gone anywhere yet.

11 Q. So, but why hasn't it happened yet?

12 A. His rates are cheaper than Stock and
13 Leader's. His hourly rate is cheaper than Stock
14 and Leader's.

15 That was asked in the board meeting
16 the night of the vote by Mrs. Tierney, and all
17 of that was said in the Sunshine.

18 Q. But how do you know what those rates
19 are in comparison with other potential firms
20 that could be qualified to be a solicitor as
21 well?

22 A. Well, his rates were less than Stock
23 and Leader's, and that was what we needed at the
24 time. Certainly we can go down in an RFP
25 process again. But --

1 Q. Do you know if all nine board members
2 agree that Attorney Hall is, in fact,
3 representing all nine board members?

4 A. I have not spoken to them about it, so
5 I don't know. There don't appear to be any
6 complaints.

7 (Brent Exhibit 4 marked for
8 identification.)

9 BY MR. ELLIOTT:

10 Q. I am showing you what we have marked
11 as Exhibit 4. This is for identification
12 purposes WSSD 10 and 11. This appears to be an
13 e-mail exchange between Brooke Say and Kevin
14 Hall dated April 5, 2024.

15 Take a minute to look at this and tell
16 me if you recognize or have seen this document
17 before.

18 A. I have not.

19 Q. Okay.

20 A. And I don't recognize it.

21 Q. Okay. Are you aware that Attorney
22 Hall contacted Attorney Say on or before April 5
23 to inform Attorney Say that there was going to
24 be a change in solicitor and that she did not
25 need to appear at the April 11 meeting?

1 MR. BONN: Objection to form.

2 You may answer.

3 THE DEPONENT: I beg your pardon?

4 MR. BONN: Go ahead and answer.

5 THE DEPONENT: Can you restate the
6 question in another way, please?

7 BY MR. ELLIOTT:

8 Q. Sure. Were you aware that Attorney
9 Hall contacted Attorney Say prior to April 11?

10 A. No.

11 Q. All right. So, are you aware of any
12 communication that Attorney Hall had where he
13 requested that Ms. Say begin transferring files
14 from her firm to Tucker Arensberg?

15 A. I learned about it long after the
16 vote.

17 Q. Okay.

18 A. Might have been even only recently I
19 heard about it. So, I was not aware of this at
20 all at the time. And I have never seen the
21 e-mail.

22 Q. Okay. So, you as of the time of the
23 meeting on April 11, you were not aware that
24 Attorney Hall had any contact with Attorney Say?

25 A. I don't think so.

1 MR. ELLIOTT: Just for completeness, I
2 want to mark this one as well.

3 (Brent Exhibit 5 marked for
4 identification.)

5 BY MR. ELLIOTT:

6 Q. I am showing you what we have marked
7 as No. 5. This one was not specifically
8 provided in -- or marked as being provided in
9 discovery. I'll represent to you this is a copy
10 of that same e-mail that I was provided in a
11 right-to-know request. For me, this is just a
12 little bit easier to read the way it is
13 formatted.

14 Can you just look at that and confirm
15 if that appears to be the same e-mail exchange
16 we just looked at in No. 4?

17 A. It appears to be.

18 Q. You don't have any reason to doubt
19 that it is just merely a different format, but
20 it is the same -- copy of the same e-mails?

21 A. I have no idea. I doubt a lot of
22 things. So, who knows.

23 (Brent Exhibit 6 marked for
24 identification.)

25 BY MR. ELLIOTT:

1 Q. I am showing you what we have marked
2 as Exhibit 6 for identification. That was WSSD
3 1 through 4.

4 Could just look through this and tell
5 me if you recognize or have seen any of these
6 e-mail communications before?

7 A. This does not look familiar to me.
8 But I can't say for sure that I don't have it
9 somewhere. But this does not look familiar to
10 me at all.

11 Q. On the first page, this appears to be
12 an e-mail from Kevin Hall to Heidi Thomas on
13 April 3, 2024, in which it says, good afternoon,
14 Heidi, please see the attached business agenda
15 items for the upcoming April meeting. Thank
16 you.

17 Did I read that correctly?

18 A. Yes.

19 Q. Then on the second page there is an
20 e-mail that appears to be from Heidi Thomas to
21 Mr. Stoltz where it says, good afternoon, Todd.
22 Please distribute this entire e-mail as we
23 discussed last night to each board member.

24 And then there is an e-mail again from
25 Mr. Hall dated April 5 where it says, please see

1 the attached, which is No. 1, information from
2 Tucker Arensberg; two, Kevin Hall information
3 sheet; three, engagement letter; four, business
4 agenda items for April 11, 2024 meeting.

5 A. Okay.

6 Q. Did I read that correctly?

7 A. You did.

8 Q. Okay. Do you remember receiving those
9 four items prior to the April 11 meeting?

10 A. I do not remember receiving this in
11 any way. I may have, but I don't recall this at
12 all.

13 Q. Okay.

14 A. Also, on a personal note, this is when
15 my mother took a serious turn for the worse, and
16 ultimately she did pass away in June. So, if I
17 don't recall this, there would be some reason.

18 Q. Okay. Do you have any explanation for
19 why Kevin Hall would be preparing the agenda
20 items prior to the April 11 meeting?

21 A. I would have no idea why that would
22 happen. The agenda items are typically
23 discussed between the president of the board --
24 sometimes I would be included, sometimes not --
25 and the administration.

1 Q. Okay.

2 A. In this case, I don't remember that.

3 Q. All right. Do you know who authorized
4 Mr. -- Attorney Hall to contact Attorney Say
5 prior to the April 11 meeting?

6 A. I have no idea.

7 Q. Do you know why Ms. Thomas would be
8 allowing information prepared by Kevin Hall to
9 be forwarded to impact the agenda for April 11,
10 for the April 11 meeting?

11 A. Ask the question a different way,
12 please.

13 Q. Do you know why Ms. Thomas would have
14 Attorney Hall prepare an agenda item for a
15 meeting for April 11 when Attorney Hall had not
16 been officially appointed as the solicitor yet?

17 A. I could only speculate. So, no.

18 Q. Okay. Just to be clear, when you say
19 you could only speculate, do you have a reason
20 you believe that may have happened, you are just
21 not sure? Or do you just have no idea?

22 A. You are asking me why did Heidi Thomas
23 do something. I don't know.

24 Q. Okay.

25 A. She does a lot of things I don't know

1 about.

2 Q. Did she speak to you in any way prior
3 to the April 11 meeting about how the agenda
4 item was going to come up?

5 A. I don't recall.

6 Q. Did you know prior to April 11 that he
7 was on the agenda to be voted upon that night?

8 A. Well, we would have to be given the
9 agenda in advance. So, I would have known based
10 on the agenda.

11 Q. All right. Do you remember how far in
12 advance you received that agenda prior to April
13 11?

14 A. No. Because, again, my mother took a
15 turn in very early April. So, just my brain
16 does not have the capacity to remember that
17 detail, if it happened at all.

18 That is the honest answer. I mean, if
19 you want me to start throwing out hypotheticals,
20 I can do that.

21 Q. I don't want you to guess. I just --
22 but if you have an estimation or approximation
23 that you think is accurate, I want to know that.
24 But I don't want you to guess.

25 A. Well, I would only be guessing.

1 Q. Okay.

2 A. There is obviously -- again, it would
3 strictly be hypothetical though. I don't
4 remember that specifically.

5 Q. Prior to getting the agenda, were you
6 expecting that the vote for Attorney Hall was
7 going to come up that evening, on April 11?

8 A. That rings a bell. So, I would say I
9 think so.

10 Q. Okay. Do you remember how you were
11 aware that was going to be placed on the agenda
12 for that evening?

13 A. No. I don't think I was included in
14 that agenda-building meeting.

15 Q. Okay. But how is it that you were
16 expecting the vote was going to take place on
17 the 11th?

18 A. It would have been on the agenda.

19 Q. Right. Did you know -- had there been
20 any discussion about putting that on the agenda
21 prior to the agenda meeting that you were aware
22 of?

23 A. I don't specifically recall.

24 Q. Do you -- is this something that Ms.
25 Thomas would have just done on her own without

1 consulting anyone else?

2 A. Ms. Thomas does a lot of things on her
3 own without consulting anyone else.

4 Q. Do you know if that is what happened
5 in this case?

6 A. I don't think I had any part of it.
7 It doesn't -- I don't recollect that I had any
8 part of that. So, you are asking me to remember
9 something that I don't remember. I really do
10 not remember --

11 Q. Okay.

12 A. -- the specifics of or the nuances of
13 it. I don't.

14 Q. Do you know how Ms. Thomas could have
15 authorized Attorney Hall to contact Ms. Say and
16 ask her to begin transition if she didn't know
17 what the result of the vote was going to be on
18 April 11?

19 A. Well, based on this letter to Mrs. Say
20 -- so, I found my footnote here. Can you please
21 ask that question again?

22 Q. How could Ms. Thomas have authorized
23 Attorney Hall to contact Attorney Say without
24 knowing or being confident that she knew what
25 the result of the vote was going to be on the

1 11th?

2 A. Well, it says here, Heidi Thomas,
3 president of the board of school directors of
4 the West Shore, asked me to reach out to you as
5 a courtesy to inform you that a change in
6 solicitor -- so, what authority did she have?

7 I would imagine just being the
8 president of the board would have -- she
9 probably assumed that she had the authority.
10 But I don't even know that she did that. So, I
11 wasn't involved in it, clearly. So, I don't
12 know.

13 I had no part of that, or my name
14 would have been mentioned. I had no part. I
15 didn't know.

16 Q. All right. But I am just asking you
17 if you have an explanation of how that could
18 have happened if Ms. Thomas wasn't aware that at
19 least five of you were going to vote in favor of
20 him being appointed as the next solicitor?

21 A. I do not have an explanation for
22 anything Mrs. Thomas did.

23 Q. All right. You are saying as of April
24 11, you were not aware of how any other school
25 board member was going to vote with regard to

1 Attorney Hall being appointed as the solicitor?

2 A. I had no way of knowing what was going
3 to happen. Based on the agenda, I just knew it
4 would be a thing.

5 As a practice, it is worth mentioning
6 we do not call each other and ask how we are all
7 going to vote. Just as a practice, we don't do
8 that. And Heidi, though she has authority to
9 poll the board, does not do that. So, you
10 should know that.

11 Q. But you don't know if in this case
12 Heidi Thomas did poll the board ahead of time?

13 A. She didn't poll me. So, I suspect she
14 didn't.

15 Q. Did the two of you at any time -- let
16 me rephrase that.

17 Did you ever tell Heidi Thomas prior
18 to the 11th that you thought Attorney Hall
19 should be appointed as the next solicitor?

20 A. No.

21 Q. Did you ever tell Ms. Thomas that you
22 thought finding a new solicitor was an emergency
23 and it is something that needed to be done
24 urgently?

25 A. I don't remember any specific language

1 I would have used. But I think we both felt
2 after the Byrnes press release from Dr. Stoltz,
3 that this had escalated for us.

4 Q. So, you believe she shared your
5 opinion that this was, in your words, an
6 emergency, something that needed to be taken
7 care of right away?

8 A. I think emergency really isn't the
9 word. I would say that misstatements from
10 authority members within our school district
11 would continue to happen and go unchecked to
12 disparage us in the press, wrongfully so, until
13 Mrs. Say would make clear to administration that
14 they are not permitted to do that to us. It is
15 not in their best interests. But that wasn't
16 happening.

17 Q. And because Ms. Say didn't do that,
18 you thought she needed to be replaced?

19 A. Not necessarily. But she certainly
20 needed several more conversations.

21 Q. Did you try to have any of those
22 conversations with her?

23 A. I think so. I think so. But I
24 couldn't tell you what the words would have
25 been. You can ask Mrs. Say.

1 Q. This would have been just a private
2 conversation between you and Miss Say, not
3 something that occurred during executive
4 session?

5 A. No.

6 Q. Prior to the April 11 meeting, were
7 you given copies of electronic written comments
8 that were -- that came in to the board prior to
9 the meeting?

10 A. In e-mail, yes.

11 Q. In e-mail.

12 A. Oh, yes.

13 (Brent Exhibit 7 marked for
14 identification.)

15 BY MR. ELLIOTT:

16 Q. I am showing you what we are marking
17 Exhibit 7. That is marked as WSSD 331 through
18 347. This appears to be the minutes to the
19 board meeting of April 11, 2024.

20 Can you just review that quick and let
21 me know if you agree that those would be a copy
22 of the minutes from that meeting?

23 A. In the format, it is the standard
24 format. So, yes, it looks like that is what it
25 would be.

1 Do you want me to go through the
2 entire set of minutes and re-examine?

3 Q. Examine it enough to be comfortable
4 that it appears to be the minutes of that
5 meeting.

6 A. Okay. Yes.

7 Q. Okay. You indicated that the comments
8 that were made electronically were forwarded to
9 the board in advance and you received copies of
10 those?

11 A. Yes.

12 Q. Did you get a chance to read all of
13 those?

14 A. Probably not every single one.

15 Q. Okay.

16 A. As we also have to prepare for the
17 board meeting. And they tend to come in, like,
18 right before the board meeting. So, you can
19 circle back and get back to the rest. But God
20 doesn't give me more hours in the day than
21 anybody else.

22 Q. Under the opportunity for public to
23 speak on business items, the people who sent
24 those written comments are listed in the
25 minutes, correct?

1 A. Yes, that's right. I see that.

2 Q. I'll represent that I counted there is
3 approximately 115 written comments that came in
4 that are addressed in the minutes.

5 Would it be fair to say that the large
6 majority of those comments expressed disapproval
7 with the process in which the solicitor was
8 being selected?

9 A. Yes. It looks very organized. No
10 question.

11 Q. Did reading any of those comments give
12 you pause that perhaps the process this was
13 going about was incorrect?

14 A. No.

15 Q. Why not?

16 A. Because I did a lot of homework
17 regarding whether this was the right way or the
18 wrong way. And it turns out Dr. Stoltz himself
19 was not -- there was no RFP for even the
20 superintendent. And it doesn't require it in
21 our policy. And the state law also doesn't
22 require it.

23 And for -- and I am also very good
24 friends with Michelle Nestor, who is the vice
25 president of the Cumberland Valley School

1 District, and I was asking her some questions,
2 like, is this even -- is there anything that
3 would preclude us from doing it. And she said
4 you may hire at will. You may -- how did she
5 say it? You don't even have to do an RFP. And
6 you are allowed to hire a new solicitor if the
7 majority votes for it.

8 And she also explained to me that
9 Cumberland Valley, in fact, has an on staff
10 attorney who is paid for by the school district
11 as an employee and that they then bring in
12 another attorney when they have a need for some
13 other specialty.

14 And, so, they have an attorney who
15 comes in to do some of the odds and ends, but
16 they actually employ an attorney to do the
17 things in the background for the school
18 district. That is the kind of volume they have.
19 So, they have enough volume to actually have an
20 attorney on staff.

21 But there is no requirement to do an
22 RFP for an attorney.

23 Q. Okay. Did you -- we talked earlier
24 about whether that might be the best business
25 practice way to go about it. It seemed to me

1 you agreed that all things being equal, that is
2 the best way to go about selecting something as
3 important as a solicitor; is that accurate?

4 A. I would say that in an ideal world,
5 that would have probably been a more -- it could
6 have been a better process. But we weren't
7 living in that world.

8 (Brent Exhibit 8 marked for
9 identification.)

10 BY MR. ELLIOTT:

11 Q. I'll show you what we have marked as
12 Exhibit 8. It is WSSD 199 through 201.

13 Take a look at these, see if you
14 recognize it seems to be an e-mail chain that
15 references legal services RFP planning notes.

16 A. Mm-hmm.

17 Q. Just take a look through this and let
18 me know if you recognize these e-mails, if you
19 have seen them before.

20 A. I may have seen them before. I don't
21 have a recollection of this. But it appears
22 that I am on these, so I must have seen them
23 before.

24 Q. Okay. On the second page, which is
25 WSSD 200, it appears there is an e-mail from you

1 to the others on this e-mail chain where you
2 say, Matt, I thank you for your assistance with
3 the RFP process. Ours is a transparent and
4 prudent approach, but there are other approaches
5 to hiring a solicitor and I just wanted everyone
6 to be aware. Thank you, again, Kelly.

7 So, did you write that?

8 A. It appears that I did write that.

9 Q. When you said there are other
10 approaches to hiring a solicitor, what did you
11 mean?

12 A. This was after my conversation with
13 Michelle Nestor and that you do not have to --
14 you don't have to put out an RFP necessarily.

15 Q. Okay. But here you are agreeing that
16 doing an RFP would be a transparent and prudent
17 approach it appears, correct?

18 A. Absolutely. It would have been in an
19 ideal world, which we are -- we didn't live
20 there. So, this is my having done some homework
21 and being aware of all the options -- legal
22 options.

23 This is actually dated March 6, before
24 Kevin ever contacted me.

25 Q. Prior to the vote on April 11, did you

1 speak to any other person other than board
2 members about Kevin Hall?

3 A. I don't recall.

4 Q. Do you know who Thaddeus Eisenhower
5 is?

6 A. I do.

7 Q. Who is he?

8 A. He was the mayor of New Cumberland.

9 Q. Is he an acquaintance of yours? Do
10 you know?

11 A. He is. He is.

12 Q. Did you speak to him about Kevin Hall
13 or the possibility of him being selected as the
14 solicitor?

15 A. It is possible. I don't recall the
16 conversation. But it is possible.

17 (Brent Exhibit 9 marked for
18 identification.)

19 BY MR. ELLIOTT:

20 Q. I am showing you what we have marked
21 as Exhibit 9. It is WSSD 382. I'll -- this
22 I'll represent this was turned over and was
23 identified as notes from one of the RFP
24 committee meetings that were taken by Mr.
25 Guistwhite.

1 A. Mm-hmm.

2 Q. Have you ever seen this before?

3 A. Yes.

4 Q. Okay. He has a note, concerns on work
5 of committee. KB, what if I don't like who they
6 pick? I am not comfortable with that.

7 Do you know what he is referring to?

8 A. Yes. Oh, yeah, I do.

9 Q. What is that? What was he referring
10 to?

11 A. This is at the point where Mr.
12 Guistwhite was putting additional -- he wanted
13 additional cabinet members on the RFP committee,
14 which was supposed to be Kelly and Abby and
15 Guistwhite and Brinton. That is the RFP
16 committee. Nobody else.

17 And administration brings a lot of
18 things to us. And the way the board members --
19 or the way the school board works is the
20 administration recommends XYZ and we would like
21 to bring this for a vote. And typically ahead
22 of time we are not -- there is no discussion
23 with the board about the process. It is just
24 this is what we recommend, yes or no.

25 And I could foresee that this would be

1 a recommendation brought to us by administration
2 now that they are on the RFP committee. And the
3 idea was that Mrs. Say was not helping the full
4 board. And the team -- the team are my
5 constituents. Those are my team.

6 And have if the only recommendation
7 the board or the administration would make to us
8 is that we retain Mrs. Say, that is the biggest
9 problem that we were having, is that Dr. Stoltz
10 was being allowed to tell lies about us to the
11 press and the press would print them and that is
12 how we were painted to our constituents.

13 So, the process being stacked in the
14 background, extra committee people that I never
15 agreed to, and Mr. Guistwhite was aggressive and
16 a bully in the background. That is exactly what
17 would happen, is it would just be back to Mrs.
18 Say. And Mrs. Say certainly had her friends
19 vote. We were not among them. She was allowing
20 things to happen passively by not doing
21 anything.

22 Q. But the point of the RFP process was
23 to shape the contents of the RFP and define the
24 parameters you were looking for for a new
25 solicitor, correct?

1 A. Right.

2 Q. Ultimately, for a new solicitor to be
3 selected, a majority of the board would need to
4 approve that?

5 A. No, that is not how the West Shore
6 School District works. Administration comes
7 forward, and then the board votes on their
8 recommendation.

9 And in this case, with the cabinet
10 being on there, David not being present, and my
11 being the only person that sees the importance
12 of a change, there would have been no change.
13 We needed a change.

14 Q. So, you are claiming that the
15 administration could have effectively prevented
16 the board from changing its solicitor?

17 A. Very possibly, yes.

18 Q. I don't think I understand how that
19 would happen. How could --

20 A. You don't know the West Shore School
21 District.

22 Q. Could you explain to me how if the
23 solicitor serves at the pleasure of the board
24 and is selected by the board, how could the
25 administration prevent you from voting for

1 whomever you wanted as the solicitor?

2 A. If Mrs. Say was the best candidate for
3 administration and the other four members of the
4 board, this singular person would be brought up
5 for a vote. The singular person who allowed
6 things to go out into the press that were lies
7 from administration.

8 Q. But as part of the RFP process,
9 presumably you would get multiple submissions
10 from multiple law firms, correct?

11 A. Presumably.

12 Q. And ultimately wouldn't it be the
13 board who decides what lawyer or firm best meets
14 the requirements of the RFP that was put out?

15 A. No. That is not how West Shore works.

16 Q. How is that not -- how --

17 A. We aren't given options. We are given
18 their recommendations to vote on. We don't get
19 all the options. We don't get to see -- when
20 the director of communications was brought
21 forth, they interviewed everybody without us.
22 We had no idea. They recommended this one
23 person. We did a little communicating and we
24 liked what he had to offer.

25 But the administration alone brings

1 forth the person that they recommend, then we
2 get to vote yes or no. You would think the
3 board would be more involved, but that is not
4 how it has been.

5 So, the construct in the background
6 would have had cabinet, and then Mr. Guistwhite
7 and Mrs. Tierney. David's missing, he is in the
8 hospital. And this would have been, like, nine
9 to one. That is how it works at the West Shore
10 School District. I am not saying it is the
11 right way, but that is how it works.

12 So, you would be wrong. The board
13 does not get to pick any candidate out of three
14 or four law firms. We don't get to pick.
15 Administration picks.

16 Q. Is that based on some existing board
17 policy?

18 A. No. It is just the West Shore way.

19 Q. Well, but now that you were in the
20 majority, couldn't you change the way that was
21 done and establish a new policy?

22 A. That appears to be what happened in
23 April.

24 Q. So, why couldn't that also have been
25 done, examining and interviewing multiple

1 candidates for the solicitor position?

2 A. We were new. We were finding our way.
3 We were learning about the obstacles.

4 (Brent Exhibit 10 marked for
5 identification.)

6 BY MR. ELLIOTT:

7 Q. I'll show you what we marked as
8 Exhibit 10. It is marked as WSSD 177 to 179.
9 It appears to be an e-mail exchange between
10 Christopher Kambic and Thaddeus Eisenhower.

11 Can you review this and let me know if
12 you have ever seen this e-mail exchange before?

13 A. I have never seen this e-mail
14 exchange.

15 Q. I take it you did not personally
16 review all of the documents that were provided
17 by your attorney to me in discovery?

18 A. I have never seen this. So, clearly I
19 have not seen everything.

20 Q. In that, in his e-mail dated April 8,
21 I am looking at the second -- beginning on the
22 second page, which is WSSD 178.

23 A. Mm-hmm.

24 Q. The second sentence says, the majority
25 wants to change the solicitor due to the fact

1 from what I am hearing that the solicitor does
2 not listen to them. She listens to the
3 administration as well as the minority, does not
4 serve the majority in the same capacity.

5 Then it goes on and he indicates, the
6 proposed solicitor is a resident of New
7 Cumberland, an upstanding individual involved in
8 many community services and that he stands
9 behind him.

10 Do you know how on or before April 8
11 Mr. Eisenhower would have known who Mr. Hall was
12 and that he was being considered as potentially
13 to be the next solicitor?

14 A. I don't. But I do know Thad.

15 Q. You don't remember specifically if you
16 talked to him about Kevin Hall?

17 A. I don't remember. I don't remember
18 any conversation like that.

19 Q. Okay.

20 A. And am I seeing -- hold on a second.

21 At this point Thad was coming to the
22 school board meetings and he was speaking.

23 Q. Okay. But as of April 8, there had
24 never been a public meeting where Kevin Hall was
25 discussed in any way, was there?

1 A. No.

2 Q. So, that was my question. How would
3 he have possibly known before the 11th that --

4 A. Is it possible that Mr. Kambic was
5 talking to him about it?

6 Q. I don't know. I am asking you what
7 your knowledge and what your information is.

8 A. Well, Thad is part of my team of
9 constituents. But I don't think I talked to
10 Thad about this at all.

11 Q. Okay.

12 A. But I can't swear.

13 Q. When you say he is part of your team
14 of constituents, what do you mean?

15 A. He lives in the school district and he
16 helped me get elected. He was part of my team,
17 my election team.

18 Q. Part of your election team?

19 A. Yes.

20 Q. In the -- did you review the answer
21 and the new matter that was filed on behalf of
22 the school district in response to the complaint
23 in this matter?

24 MR. BONN: I can't answer the question
25 for you. If you remember or not.

1 THE DEPONENT: Do you have any
2 paperwork that says that I signed anything, or
3 an e-mail that says I signed it?

4 You have to remember, in this window
5 that we are talking about, my mother started
6 dying. She started going into hospice. So, I
7 might be a little scrambled.

8 But if you have the paperwork, I would
9 love to see it.

10 MR. ELLIOTT: I have printed it out.
11 If we want to mark it or something, we can do
12 that. She signed a verification.

13 MR. BONN: My recollection is she
14 verified it. She probably has no idea.

15 BY MR. ELLIOTT:

16 Q. You may not remember. I'll show you.
17 This is a verification --

18 A. Yeah, yeah, yeah. I signed that, yes.

19 Q. -- attached to the answer that was
20 given.

21 Paragraph 54 of the new matter states,
22 upon information and belief, Plaintiffs Stephen
23 Beaver, Leah Cooper, Amy Elliott, John Elliott,
24 Jeff Harmon, Tara High, Katherine Jan Jarrett,
25 Jesse Sayre, and Jane Vivier have brought this

1 lawsuit for the illegitimate means of imposing
2 their political agenda on the West Shore School
3 District, regardless of how the majority of the
4 duly-elected board members voted.

5 Do you agree with that statement?

6 A. When was that statement made?

7 MR. BONN: That was made in our
8 response to their complaint.

9 THE DEPONENT: Yes. Can you read it
10 again for me, please?

11 BY MR. ELLIOTT:

12 Q. That was your --

13 A. My words.

14 Q. Well, not necessarily your specific
15 words. This appeared as the answer on behalf of
16 the school district to the complaint, which was
17 filed November 6, 2024. No. 54 is in a section
18 that is called new matter, where on behalf of
19 the school district they are asserting either
20 defenses or additional facts that they want the
21 Court to be aware of, essentially.

22 No. 54 said, upon information and
23 belief, Plaintiffs Stephen Beaver, Leah Cooper,
24 Amy Elliott, John Elliott, Jeff Harmon, Tara
25 High, Katherine Jan Jarrett, Jesse Sayre, and

1 Jane Vivier have brought this lawsuit for the
2 illegitimate means of imposing their political
3 agenda on the West Shore School District,
4 regardless of how the majority of the duly-
5 elected board members voted.

6 That paragraph appears in the pleading
7 which was filed with the Court, and you were one
8 of the people who verified you believe all of
9 the statements are true to the best of your
10 knowledge or recollection.

11 Sitting here today, do you believe
12 that is an accurate statement?

13 A. Could you read it again for me?

14 Q. Sure. I'll tell you what, if we could
15 take short break, I'll make a photocopy.

16 A. That would be great.

17 MR. ELLIOTT: Let me -- I'll extract
18 that page directly from --

19 MR. BONN: Essentially he is asking,
20 do you agree with the defenses that we raised.

21 THE DEPONENT: Yeah. Shouldn't I?

22 MR. BONN: I can't tell you how to
23 answer.

24 THE DEPONENT: But this was your --

25 MR. BONN: Yes.

1 THE DEPONENT: So, I agree with that.

2 BY MR. ELLIOTT:

3 Q. Okay. Do you want me to have my
4 assistant print that out so you can read it? Or
5 are you comfortable that you --

6 A. Sure, I would love a printout. That
7 would be great.

8 (Heidi Thomas entered the room.)

9 (Discussion off the record.)

10 (Brent Exhibit 11 marked for
11 identification.)

12 BY MR. ELLIOTT:

13 Q. I am showing you what we have marked
14 as 11. This is Page 10 from the answer and new
15 matter that was filed on behalf of the district.
16 At the top you can see the date stamp for when
17 this -- from when that document was filed with
18 the Prothonotary, which was November 6.

19 I was referring to Paragraph 54, which
20 is the last one on the bottom of the page. Just
21 let me know when you have had a chance to read
22 it.

23 A. Yes, I have read it. And I would
24 agree with this statement.

25 Q. Okay. What is the political agenda

1 that's being referenced there?

2 A. I would say maybe more, like, their
3 will.

4 Q. Is that will -- do you believe that
5 will is based on some underlying political
6 agenda?

7 A. I believe it is probably based on some
8 underlying -- I am trying to think what word I
9 am thinking of.

10 MR. BONN: You are marking up what is
11 marked as Exhibit Brent 11.

12 THE DEPONENT: I wrote on it. Sorry.

13 BY MR. ELLIOTT:

14 Q. What did you write on it? Just so we
15 know.

16 A. Activism. I don't know if it is a
17 political agenda.

18 Q. Okay. What -- do you have any
19 evidence to support the claim that the case was
20 brought for illegitimate reasons of any kind?

21 A. I would say the evidence is we did not
22 confer, we did not get together, we didn't come
23 to a conclusion before the meeting. And,
24 therefore, this is ridiculous that I am in this
25 room.

1 Q. Okay. You said before you don't know
2 what Heidi Thomas may or may have said or talked
3 about with the other board members, correct?

4 A. I do not. I was not in on it.

5 Q. All right.

6 A. Heidi is her own person.

7 Q. You said earlier that prior to the
8 meeting -- and I think you said you only just
9 recently saw the e-mail exchange between
10 Attorney Say and Attorney Hall, correct?

11 A. Yes, that's right.

12 Q. Do you remember how recently it was
13 that you saw that?

14 A. I couldn't tell you.

15 Q. But you don't believe as of November
16 6, 2024, at that point you don't believe you
17 were aware of that exchange at that point?

18 A. I don't recall.

19 Q. All right. Do you recall if you knew
20 at that point whether Attorney Hall had been --
21 had participated in actually preparing the
22 agenda items for the April 11 meeting
23 beforehand?

24 A. I did not.

25 Q. So, other than your own belief that

1 you didn't do anything wrong, do you have any
2 evidence that any of the Plaintiffs were
3 specifically acting with a bad motive as opposed
4 to being concerned with enforcing the Sunshine
5 Act?

6 A. Say the question again, please.

7 Q. Other than your own belief that you
8 didn't do anything wrong --

9 A. Yes.

10 Q. -- do you have any evidence that any
11 of the Plaintiffs are specifically acting with a
12 bad or illegitimate motive in bringing the
13 lawsuit?

14 A. Can you -- so -- evidence?

15 Q. Yes.

16 A. No. Just a lot of anecdotal thoughts.
17 But no evidence other than the results kind of
18 speak for themselves. It takes away time from
19 the school board, as intended. It takes time
20 out of everybody's life, as intended. So --

21 Q. When you say as intended, what do you
22 mean by that?

23 A. Well, I am here, aren't I? This takes
24 time. It wastes the time of the board members.

25 Q. So, are you claiming that the

1 intention is to waste time, as opposed to
2 enforcing the law?

3 A. Well, I can't presume that I know how
4 you would say you are wasting my time. So,
5 let's say you really want to enforce the law.
6 Let's say that.

7 Q. Okay.

8 A. But a lot of other things happened
9 because of this lawsuit. So -- as could be
10 expected.

11 Q. When you say a lot of other things
12 happened because of the lawsuit, what are you
13 referring to?

14 A. Having to find our phone records and
15 provide them, that takes time. So, that is a
16 waste of time, right? Not for you, but for us.

17 Q. You are talking about the discovery
18 process --

19 A. Yeah.

20 Q. -- and what you have to respond to in
21 discovery?

22 A. Yeah. So, it really -- we didn't
23 violate the Sunshine Act. But the very act of
24 going through this exercise takes an enormous
25 amount of time that I don't believe I owe you.

1 Q. All right.

2 A. I owe my constituents that time, but I
3 can't give them that time because of this group.

4 Q. My question is -- just to make sure I
5 have understood your answer. You don't have
6 specifically any evidence to suggest that's the
7 intent of the lawsuit, as opposed to an interest
8 in enforcing the Sunshine Act?

9 A. No.

10 MR. ELLIOTT: Okay. Why don't we
11 break for just a minute. I think that might be
12 it.

13 MR. BONN: I have some questions.

14 MR. ELLIOTT: Okay.

15 MR. BONN: We can break.

16 MR. ELLIOTT: Do you want to do that
17 first?

18 MR. BONN: Yeah.

19 MR. ELLIOTT: You can go ahead first.

20 EXAMINATION

21 BY MR. BONN:

22 Q. Ms. Brent, Josh Bonn on behalf of the
23 West Shore School District Board of Directors.

24 You testified earlier that you have
25 had Sunshine Act training?

1 A. I have.

2 Q. Based on that training, what is your
3 understanding of what you are allowed -- what a
4 deliberation is, what you are allowed to do,
5 what you are not allowed to do under the
6 Sunshine Act?

7 A. We are not allowed to have a quorum.
8 We are not allowed to get together and make
9 final decisions without being -- without the
10 full board having the meeting and everyone
11 voting their own singular vote.

12 We do not collude or get together. We
13 don't have Zoom calls. We absolutely do not
14 vote outside of the board meeting.

15 Q. Are you allowed to talk to other
16 members to educate yourself on issues?

17 A. 100 percent.

18 Q. And can you elaborate on that for me
19 what you recall from your training?

20 A. So, if something is on the agenda and
21 the paperwork doesn't make sense to me or
22 someone else, we might call and ask, on the
23 contract, on Page 3 where it says XYZ, do you
24 know if this means A or B, how would you
25 interpret this. Will you call Stevie and get an

1 answer for that and get back to me, I am not
2 sure about that page.

3 We might get a request from a
4 constituent that says we really want to look
5 into a cell phone policy. We understand social
6 media is very detrimental to the mental health
7 of our children, and Florida has ruled it out,
8 can you guys look into that policy. I might
9 call another school board member to say, hey,
10 have you heard from anybody in the community
11 about the cell phone policy? We might talk
12 about it a little bit. We might then do some
13 homework about it. We may speak briefly about
14 it in executive session.

15 We may move forward, we might not.
16 But we talk to each other about the kinds of
17 things that are happening in the school district
18 and the things that our community and our
19 constituents are bringing to us as potential
20 issues, action items or not.

21 So, we are allowed to talk with each
22 other.

23 Q. How do you as a board member
24 distinguish between prohibited deliberations
25 versus information gathering?

1 A. Well, deliberation is sourcing how
2 someone thinks they might vote. And that is --
3 you don't do that. And we don't do that. But
4 learning information about an upcoming meeting
5 with regard to the paperwork or learning about a
6 future process regarding something the school
7 constituents are talking about, you are allowed
8 to do that.

9 Q. Did you ever talk to any other board
10 member about how you were going to vote on the
11 replacement of the solicitor?

12 A. Never.

13 Q. Did you know how any other board
14 member was going to vote on the replacement of
15 the solicitor?

16 A. I did not know.

17 Q. Has the West Shore School District
18 issued any RFPs this year?

19 A. I don't recall.

20 Q. You don't recall voting on any --
21 issuing any RFPs by the board?

22 A. We may have. But I know that we are
23 working on one right now, as a matter of fact,
24 for the natatorium. So, those things are -- oh,
25 and there was a bus, a bus RFP that was done a

1 couple years ago that they are renewing right
2 now.

3 So, it does get done. It does happen.

4 Q. My question, do you know if those RFPs
5 are just issued by the administration as an
6 administrative action? Or is that something the
7 board actually votes on whenever an RFP is
8 issued?

9 A. The administration puts it together,
10 and then it comes to the board as a vote per the
11 administration recommends. We are not part of
12 the -- they don't allow us to become a part of
13 that process. They strictly go by the
14 administration recommends. So far. So far.

15 Q. I think you testified earlier there
16 was no vote to disband or stop the RFP
17 committee?

18 A. No, there was no vote to do that. I
19 just -- based on the hostility and the
20 aggression of -- it wasn't just Mr. Guistwhite.
21 It was in the room against me and my not having
22 a cohort. It was a boundary that they crossed
23 with the way they treated me.

24 Q. Do you recall if there was a vote at
25 the April 11 public meeting to suspend the board

1 policy regarding RFPs?

2 A. I do.

3 Q. Was that -- what happened?

4 A. What do you mean, what happened?

5 Q. Well, what was that vote? What did
6 that vote mean?

7 A. That we -- presumably that we didn't
8 have to have an RFP for anything voted on that
9 night.

10 Is that what you are talking about?

11 Q. Yes.

12 A. Yeah. But, again, the solicitor is
13 not required in the policy that we have an RFP.
14 I just want to reiterate that.

15 Q. Did you go into the April 11 meeting
16 with an open mind about how you were going to
17 vote regarding the change in the solicitor?

18 A. I had a very open mind at the
19 beginning of the meeting. But as the meeting
20 progressed and the meeting became like a
21 coliseum spectacle with people shouting at me
22 and people were mouthing that they know where I
23 live, I was being given the finger by Sherry
24 Moyer, the person I replaced. I mean, it was a
25 very, very hostile room. And in that --

1 Q. Were you concerned about making public
2 comment that night that would have been
3 disparaging to Brooke Say?

4 A. I was very worried about that.

5 Q. Why?

6 A. Because she is a professional and I
7 didn't want her to be -- as a professional
8 courtesy, I don't like to undermine any other
9 businesswoman. That is just a professional
10 courtesy that I have. Had I had it to do over
11 again, I would have laid everything out on the
12 table. But --

13 Q. There was a question about whether the
14 minority candidates had an opportunity to
15 interview Kevin Hall.

16 Do you recall if the agenda was
17 distributed prior to the April 11 meeting that
18 said there was a possible change in solicitor on
19 that agenda?

20 A. I don't remember, but it is possible,
21 there was a possible change on the solicitor.
22 But it had to be from a vote, and there had to
23 be deliberation.

24 Q. You saw this e-mail exchange between
25 Mr. Kambic and Mr. Eisenhower. That was prior

1 to the April 11 meeting, correct?

2 A. I can go back and look at the date.

3 As a matter of fact, it was April 10.

4 Q. So --

5 A. So, yes. One day before.

6 Q. So, based on that, it appeared to you
7 -- does it appear to you that Mr. Kambic knew
8 that Mr. Hall was on the agenda for the April 11
9 meeting?

10 A. It appears that way, yes.

11 Q. Is there anything that would have
12 prevented Mr. Kambic from reaching out to Mr.
13 Hall the way other board members did?

14 A. No. He certainly would have had
15 opportunity. If he was talking with Thad, he
16 could have called Mr. Hall.

17 Q. In with regards to the Brent Exhibit
18 11 regarding political agenda.

19 A. Mm-hmm.

20 Q. Is it your understanding that Tara
21 High, who is a Plaintiff in this case, was a
22 political candidate against one of the five
23 majority board members?

24 A. She absolutely was.

25 Q. So, she ran for office --

1 A. And lost.

2 Q. -- and lost?

3 A. Yes.

4 Q. Now she is a Plaintiff in this
5 lawsuit?

6 A. I know.

7 Q. Does that make you think that this --
8 that on -- that her lawsuit is politically
9 motivated?

10 A. Sure. That is a piece of it,
11 absolutely.

12 MR. BONN: Nothing further.

13 MR. ELLIOTT: I do have a couple
14 follow-up. Before I do though, let's take a
15 quick break. I want to consult with my clients,
16 just so we do this once and not piecemeal, if
17 that is okay. Take a two-minute break?

18 MR. BONN: That is fine.

19 MR. ELLIOTT: Off the record for just
20 a second.

21 (A recess was taken from 1:22 p.m.
22 until 1:27 p.m.)

23 RE-EXAMINATION

24 BY MR. ELLIOTT:

25 Q. I have just a couple follow-up from

1 that.

2 You were asked about the difference
3 between deliberation versus information
4 gathering?

5 A. Mm-hmm.

6 Q. So, you are aware under the Sunshine
7 Act that actual deliberation needs to be taking
8 place at a public meeting, correct?

9 A. Yes.

10 Q. And what is your understanding of what
11 deliberation means?

12 A. I would imagine it is discussing back
13 and forth and coming to a conclusion with
14 another person, which never happened.

15 Q. Okay. You are saying that never
16 happened in your presence or with anyone you
17 talked to?

18 A. No.

19 Q. During Mr. Bonn's questioning, you
20 said that after the agenda came out, the other
21 four board members who had voted against Mr.
22 Hall would have had an opportunity to reach out
23 to him and question him prior to the meeting.

24 Was that your understanding or your
25 take?

1 A. Well, it appears Mr. Kambic reached
2 out to Mr. Eisenhower; is that right?

3 Q. There is -- I mean, there is an e-mail
4 from Mr. Eisenhower to Mr. Kambic initially, I
5 believe, on the eighth.

6 A. So, with that, if that is on the
7 eighth, then Chris Kambic being made aware of
8 it, he would have been able to call Mr. Hall,
9 wouldn't that be right?

10 Q. Okay. Do you believe three days'
11 notice would be enough time to gather enough
12 information to make an informed decision on
13 something like the solicitor?

14 A. I can't speak to Mr. Kambic's
15 threshold.

16 Q. But you indicated you met and talked
17 with Mr. Hall multiple times over the course of
18 -- essentially a month from starting March 12
19 through April 11, correct?

20 A. Yes. I spoke with him mostly on the
21 phone.

22 Q. So, do you believe that those other
23 four members were given the same opportunity to
24 attempt to assess Mr. Hall's qualifications?

25 A. I have no idea.

1 Q. All right. You mentioned that Tara
2 High, that she might have a political motive for
3 being a Plaintiff based upon losing the election
4 for school board.

5 Do you have any -- other than the fact
6 that occurred, do you have any evidence that is,
7 in fact, Ms. High's primary motivation for being
8 a Plaintiff in this action?

9 A. No.

10 MR. ELLIOTT: Okay. Does that bring
11 up any follow-up for you?

12 MR. BONN: No.

13 MR. ELLIOTT: I think that will do it.
14 We'll be -- we are done. Thank you for your
15 time.

16 (At 1:30 p.m., the deposition
17 concluded.)

18 * * * *

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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 11th day of February, 2025.

18

19

20



21

Angela N. Kilby - Reporter
Notary Public

22

Commission Expiration: June 2, 2027

23

24

25

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'93 ^[2] - 8:11, 9:3 '95 ^[2] - 8:11, 9:3		4	A	
0		4 ^[6] - 3:3, 3:13, 89:7, 89:11, 91:16, 92:3 4173 ^[1] - 60:5	a.m ^[3] - 1:17, 59:7, 59:8 Abby ^[2] - 74:8, 108:14 Abigail ^[1] - 73:16 ability ^[2] - 38:25, 136:11 able ^[6] - 19:17, 25:1, 34:16, 35:5, 39:10, 134:8 Absolutely ^[4] - 35:14, 45:20, 56:2, 106:18 absolutely ^[5] - 36:5, 74:15, 125:13, 131:24, 132:11 accident ^[1] - 55:20 accidental ^[1] - 55:21 according ^[4] - 15:7, 19:6, 36:2, 46:22 accounting ^[1] - 12:13 accurate ^[8] - 23:7, 27:13, 31:22, 51:8, 62:21, 95:23, 105:3, 118:12 accurately ^[2] - 60:14, 60:20 accused ^[1] - 30:23 Ace ^[1] - 13:2 achieve ^[1] - 68:6 acquaintance ^[1] - 107:9 Act ^[10] - 9:15, 10:2, 10:13, 12:18, 122:5, 123:23, 124:8, 124:25, 125:6, 133:7 act ^[1] - 123:23 acting ^[5] - 40:13, 47:24, 63:8, 122:3, 122:11 Action ^[2] - 1:3, 3:22 action ^[4] - 68:12, 126:20, 128:6, 135:8 actively ^[3] - 72:14, 87:1, 87:6 Activism ^[1] - 120:16 actual ^[3] - 38:7, 83:15, 133:7 ad ^[5] - 23:5, 23:22, 24:12, 27:6, 31:20	
02/16 ^[1] - 3:10 03/15/2024 ^[1] - 3:10 03/16 ^[1] - 3:12 04/11/2024 ^[1] - 3:18 04/15/2024 ^[1] - 3:12		5		
1	1 ^[6] - 3:8, 25:22, 26:5, 60:5, 92:3, 93:1 1/11 ^[1] - 47:4 1/8 ^[1] - 47:3 10 ^[11] - 3:23, 3:25, 20:24, 24:21, 50:22, 51:7, 89:12, 113:4, 113:8, 119:14, 131:3 100 ^[3] - 13:23, 14:12, 125:17 101 ^[1] - 3:19 105 ^[1] - 3:21 107 ^[1] - 3:22 11 ^[53] - 3:25, 58:20, 62:4, 62:17, 68:3, 68:24, 73:3, 73:9, 73:16, 75:9, 78:11, 79:5, 80:18, 80:22, 81:5, 81:8, 81:15, 82:15, 82:22, 83:1, 87:25, 89:12, 89:25, 90:9, 90:23, 93:4, 93:9, 93:20, 94:5, 94:9, 94:10, 94:15, 95:3, 95:6, 95:13, 96:7, 97:18, 98:24, 101:6, 101:19, 106:25, 119:10, 119:14, 120:11, 121:22, 128:25, 129:15, 130:17, 131:1, 131:8, 131:18, 134:19 113 ^[1] - 3:24 115 ^[1] - 103:3 119 ^[3] - 1:19, 2:4, 3:25 11:07 ^[1] - 59:7	17101 ^[1] - 2:9 17339 ^[1] - 5:2 17401 ^[1] - 2:4 17404 ^[1] - 1:23 177 ^[1] - 113:8 178 ^[1] - 113:22 179 ^[1] - 113:8 1982 ^[1] - 7:8 1984 ^[1] - 7:10 1987 ^[2] - 8:24, 9:20 199 ^[1] - 105:12 1:22 ^[1] - 132:21 1:27 ^[1] - 132:22 1:30 ^[1] - 135:16	5 ^[7] - 3:15, 51:7, 89:14, 89:22, 91:3, 91:7, 92:25 501 ^[1] - 5:1 54 ^[4] - 116:21, 117:17, 117:22, 119:19 59 ^[2] - 3:11, 3:12 5:00 ^[1] - 64:25 5:01 ^[2] - 64:25, 65:4 5:03 ^[1] - 65:8	
	2	6		
	2 ^[5] - 3:10, 59:12, 59:16, 60:13, 136:22 2/15 ^[6] - 20:7, 23:12, 84:2, 84:17, 85:7, 85:19 2/8 ^[1] - 23:12 200 ^[1] - 105:25 201 ^[1] - 105:12 2023 ^[2] - 11:2, 11:5 2024 ^[11] - 11:4, 12:25, 13:8, 68:3, 79:5, 89:14, 92:13, 93:4, 101:19, 117:17, 121:16 2024-SU-001322 ^[1] - 1:3 2025 ^[2] - 1:16, 136:17 2027 ^[1] - 136:22 240 ^[1] - 2:9 25 ^[2] - 3:9, 51:7 28 ^[1] - 1:16	6 ^[8] - 3:17, 51:7, 91:23, 92:2, 106:23, 117:17, 119:18, 121:16		
		7		
		7 ^[3] - 3:18, 101:13, 101:17 70 ^[1] - 56:23 700 ^[1] - 59:19 702 ^[1] - 59:19 717 ^[1] - 1:24 717.480.5304 ^[1] - 2:10 717.843.8968 ^[1] - 2:5 729 ^[1] - 59:19 739 ^[1] - 59:20 764-7801 ^[1] - 1:24 7th ^[1] - 2:9		
		8		
	3	8 ^[8] - 3:20, 23:13, 48:15, 105:8, 105:12, 113:20, 114:10, 114:23 89 ^[1] - 3:14		
	3 ^[7] - 3:12, 51:7, 59:12, 59:16, 60:13,			

92:14, 93:4, 93:19, 93:22, 94:9, 94:14, 95:3, 95:7, 95:9, 95:10, 95:12, 96:5, 96:11, 96:14, 96:18, 96:20, 96:21, 99:3, 117:2, 118:3, 119:25, 120:6, 120:17, 121:22, 125:20, 130:16, 130:19, 131:8, 131:18, 133:20 agenda-building [5] - 46:15, 47:4, 81:17, 81:18, 96:14 aggravated [1] - 57:8 aggression [3] - 35:6, 35:7, 128:20 aggressive [7] - 35:24, 40:5, 40:7, 71:9, 75:14, 75:15, 109:15 aggressively [1] - 29:2 ago [1] - 128:1 agree [10] - 39:1, 59:21, 60:14, 87:10, 89:2, 101:21, 117:5, 118:20, 119:1, 119:24 agreed [4] - 4:2, 38:22, 105:1, 109:15 agreeing [1] - 106:15 agreement [5] - 37:7, 37:8, 37:11, 40:19, 61:16 ahead [4] - 90:4, 99:12, 108:21, 124:19 alarming [1] - 66:19 allegation [2] - 14:9, 31:2 allied [1] - 7:10 allow [2] - 71:17, 128:12 allowed [14] - 10:5, 49:19, 55:2, 104:6, 109:10, 111:5, 125:3, 125:4, 125:5, 125:7, 125:8, 125:15, 126:21, 127:7 allowing [3] - 18:20, 94:8, 109:19 alone [4] - 35:23, 36:3, 57:23, 111:25 ALSO [1] - 2:14 amount [4] - 60:22, 76:21, 123:25 Amy [3] - 1:3, 116:23,	117:24 anecdotal [1] - 122:16 Angela [3] - 1:20, 136:6, 136:20 angry [1] - 13:18 announced [1] - 20:21 Answer [1] - 3:25 answer [17] - 6:11, 10:1, 17:9, 57:5, 57:7, 57:13, 90:2, 90:4, 95:18, 115:20, 115:24, 116:19, 117:15, 118:23, 119:14, 124:5, 126:1 answers [1] - 136:11 anticipation [1] - 10:14 antiquated [2] - 25:17, 25:20 anyway [2] - 50:5, 55:1 apologize [2] - 21:8, 65:23 apologized [1] - 66:1 apologizing [1] - 67:21 apology [1] - 67:18 appear [3] - 89:5, 89:25, 131:7 APPEARANCES [1] - 2:1 appeared [3] - 87:4, 117:15, 131:6 apply [1] - 136:15 appointed [6] - 83:21, 83:23, 94:16, 98:20, 99:1, 99:19 approach [2] - 106:4, 106:17 approaches [2] - 106:4, 106:10 appropriate [1] - 52:16 approval [1] - 39:11 approve [2] - 38:7, 110:4 approximation [1] - 95:22 April [60] - 51:7, 58:20, 62:4, 62:17, 68:3, 68:24, 73:3, 73:9, 73:16, 75:9, 78:11, 79:5, 80:18, 80:22, 81:5, 81:8, 81:15, 82:15, 82:22, 83:1, 85:10, 87:25, 89:14, 89:22, 89:25, 90:9, 90:23, 92:13, 92:15, 92:25, 93:4, 93:9, 93:20, 94:5,	94:9, 94:10, 94:15, 95:3, 95:6, 95:12, 95:15, 96:7, 97:18, 98:23, 101:6, 101:19, 106:25, 112:23, 113:20, 114:10, 114:23, 121:22, 128:25, 129:15, 130:17, 131:1, 131:3, 131:8, 134:19 area [1] - 51:25 Arensberg [6] - 42:12, 62:12, 69:18, 88:4, 90:14, 93:2 Argot [9] - 17:16, 46:16, 48:23, 48:24, 49:2, 55:10, 55:23, 65:9, 67:5 arranged [1] - 80:13 articles [1] - 69:22 asserting [1] - 117:19 assess [1] - 134:24 assistance [1] - 106:2 assistant [3] - 19:4, 28:11, 119:4 associated [2] - 61:8, 68:9 assumed [1] - 98:9 attached [3] - 92:14, 93:1, 116:19 attachment [1] - 49:24 attacked [2] - 48:7, 63:5 attempt [2] - 69:10, 134:24 attempted [1] - 44:17 attempting [2] - 52:20, 80:11 attend [7] - 35:6, 35:8, 36:7, 53:24, 55:1, 79:16, 81:22 attendance [4] - 19:4, 30:6, 30:15, 30:17 attended [6] - 13:3, 18:15, 19:3, 81:19, 81:25, 82:17 attending [2] - 52:21, 62:11 attention [1] - 77:18 Attorney [36] - 5:18, 50:10, 64:7, 68:2, 68:8, 68:18, 78:5, 78:11, 78:21, 79:4, 79:25, 80:19, 80:24, 86:4, 89:2, 89:21, 89:22, 89:23, 90:8, 90:9, 90:12, 90:24, 94:4, 94:14, 94:15, 96:6, 97:15, 97:23,	99:1, 99:18, 121:10, 121:20 attorney [17] - 6:25, 26:2, 52:22, 53:3, 53:6, 53:8, 60:16, 63:11, 84:19, 85:9, 104:10, 104:12, 104:14, 104:16, 104:20, 104:22, 113:17 attorneys [4] - 53:4, 68:25, 69:17, 71:6 authority [4] - 98:6, 98:9, 99:8, 100:10 authorized [3] - 94:3, 97:15, 97:22 available [2] - 10:15, 29:9 aware [19] - 17:4, 58:2, 81:4, 81:7, 89:21, 90:8, 90:11, 90:19, 90:23, 96:11, 96:21, 98:18, 98:24, 106:6, 106:21, 117:21, 121:17, 133:6, 134:7	B back-up [4] - 14:14, 21:10, 40:20, 42:8 background [5] - 7:6, 104:17, 109:14, 109:16, 112:5 bad [6] - 22:14, 54:25, 55:25, 70:14, 122:3, 122:12 Bald [1] - 7:7 barking [1] - 71:10 Based [3] - 61:21, 99:3, 125:2 based [12] - 28:2, 61:18, 66:11, 87:2, 95:9, 97:19, 112:16, 120:5, 120:7, 128:19, 131:6, 135:3 basis [1] - 24:20 Bates [10] - 3:9, 3:11, 3:12, 3:14, 3:16, 3:17, 3:19, 3:21, 3:22, 3:24 battering [1] - 86:9 Beaver [3] - 1:3, 116:23, 117:23 became [1] - 129:20 become [1] - 128:12 becoming [1] - 79:7 beforehand [1] - 121:23 beg [1] - 90:3	began [1] - 11:3 begging [1] - 67:24 begin [3] - 7:4, 90:13, 97:16 beginning [3] - 48:19, 113:21, 129:19 begun [1] - 69:7 behalf [13] - 23:1, 47:24, 62:12, 63:8, 66:1, 66:2, 67:22, 68:5, 115:21, 117:15, 117:18, 119:15, 124:22 behavior [3] - 19:12, 30:10, 30:23 behind [1] - 114:9 belief [4] - 116:22, 117:23, 121:25, 122:7 bell [1] - 96:8 beside [1] - 52:23 Best [1] - 86:20 best [14] - 6:3, 8:11, 22:23, 46:10, 69:8, 86:16, 88:5, 100:15, 104:24, 105:2, 111:2, 111:13, 118:9, 136:11 better [5] - 63:3, 72:17, 78:16, 87:21, 105:6 between [12] - 4:3, 9:3, 13:7, 64:19, 89:13, 93:23, 101:2, 113:9, 121:9, 126:24, 130:24, 133:3 beyond [1] - 31:18 bids [1] - 11:23 big [3] - 49:19, 57:23, 57:24 bigger [1] - 37:16 biggest [2] - 85:22, 109:8 bit [5] - 20:23, 21:6, 25:11, 91:12, 126:12 blank [1] - 26:16 board [134] - 11:1, 13:10, 14:15, 15:23, 16:22, 17:21, 17:22, 17:25, 18:5, 18:15, 18:24, 19:21, 19:25, 21:5, 22:9, 23:1, 29:15, 29:25, 30:5, 31:17, 38:2, 38:6, 38:18, 38:23, 39:10, 42:5, 42:16, 44:2, 44:7, 46:18, 46:20, 46:23, 47:5, 47:8, 47:15, 47:25, 48:1,
---	--	--	--	--	--

49:6, 49:22, 50:3,
52:19, 52:22, 53:13,
53:18, 53:22, 54:19,
54:23, 54:24, 55:7,
57:21, 57:25, 61:7,
62:21, 63:2, 63:15,
63:16, 63:24, 64:2,
64:8, 64:12, 65:25,
66:2, 67:11, 68:4,
68:6, 70:17, 72:20,
72:21, 72:25, 73:1,
73:5, 75:18, 75:25,
76:1, 76:5, 76:23,
79:17, 80:18, 80:24,
81:9, 82:3, 86:22,
88:15, 89:1, 89:3,
92:23, 93:23, 98:3,
98:8, 98:25, 99:9,
99:12, 101:8,
101:19, 102:9,
102:17, 102:18,
107:1, 108:18,
108:19, 108:23,
109:4, 109:7, 110:3,
110:7, 110:16,
110:23, 110:24,
111:4, 111:13,
112:3, 112:12,
112:16, 114:22,
117:4, 118:5, 121:3,
122:19, 122:24,
125:10, 125:14,
126:9, 126:23,
127:9, 127:13,
127:21, 128:7,
128:10, 128:25,
131:13, 131:23,
133:21, 135:4
Board [3] - 1:8, 74:17,
124:23
boards [1] - 11:8
body [2] - 35:25, 75:14
BONN [22] - 2:8, 4:23,
9:14, 10:10, 38:11,
76:14, 90:1, 90:4,
115:24, 116:13,
117:7, 118:19,
118:22, 118:25,
120:10, 124:13,
124:15, 124:18,
124:21, 132:12,
132:18, 135:12
Bonn [3] - 3:4, 5:18,
124:22
Bonn's [1] - 133:19
bottom [2] - 26:6,
119:20
bottom-right [1] - 26:6
boundary [5] - 71:18,
71:22, 75:6, 75:13,

128:22
Boundary [1] - 71:20
box [2] - 56:23, 57:1
brain [1] - 95:15
break [10] - 6:25, 13:7,
59:1, 59:6, 62:2,
118:15, 124:11,
124:15, 132:15,
132:17
Brenda [4] - 1:10,
2:16, 78:21, 78:22
Brenneman [1] - 5:1
Brent [20] - 1:9, 1:14,
4:16, 4:21, 10:11,
25:22, 28:10, 47:7,
59:12, 89:7, 91:3,
91:23, 101:13,
105:8, 107:17,
113:4, 119:10,
120:11, 124:22,
131:17
BRENT [2] - 3:7, 4:10
Brian [3] - 27:22, 40:4,
40:25
Brian's [1] - 27:21
brief [2] - 50:24, 78:23
briefly [2] - 12:16,
126:13
bring [6] - 34:6, 38:22,
53:7, 104:11,
108:21, 135:10
bringing [3] - 85:8,
122:12, 126:19
brings [3] - 29:13,
108:17, 111:25
Brinton [17] - 1:9,
23:19, 28:10, 28:14,
28:22, 29:8, 31:24,
35:5, 36:4, 36:17,
37:23, 39:7, 39:11,
79:2, 79:4, 79:7,
108:15
Brooke [8] - 16:11,
17:23, 17:25, 65:16,
66:15, 72:3, 89:13,
130:3
brought [14] - 14:9,
14:11, 14:21, 15:1,
15:4, 24:11, 74:20,
85:3, 109:1, 111:4,
111:20, 116:25,
118:1, 120:20
budgets [2] - 11:24,
12:5
building [7] - 37:2,
46:15, 47:4, 70:20,
81:17, 81:18, 96:14
Building [1] - 13:2
bully [1] - 109:16
burned [2] - 74:4,

74:14
bus [5] - 56:20, 56:23,
57:14, 127:25
Business [1] - 3:17
business [22] - 9:12,
9:22, 10:11, 10:22,
12:8, 22:2, 22:12,
22:14, 22:20, 22:23,
29:12, 43:1, 43:2,
43:7, 43:9, 69:8,
86:16, 86:20, 92:14,
93:3, 102:23, 104:24
businesswoman [1] -
130:9
BY [25] - 1:15, 2:3, 2:8,
4:15, 5:3, 10:18,
25:24, 38:13, 59:14,
76:18, 89:9, 90:7,
91:5, 91:25, 101:15,
105:10, 107:19,
113:6, 116:15,
117:11, 119:2,
119:12, 120:13,
124:21, 132:24
Byrnes [5] - 19:1,
30:1, 31:13, 31:17,
100:2
BYRNES [1] - 19:1

C

cabinet [7] - 28:23,
29:1, 32:8, 38:2,
108:13, 110:9, 112:6
Camp [2] - 45:12,
45:13
campaign [2] - 43:1,
44:2
candidate [3] - 111:2,
112:13, 131:22
candidates [2] -
113:1, 130:14
cannot [2] - 21:4,
82:16
capacity [3] - 8:7,
95:16, 114:4
card [3] - 43:1, 43:7,
43:9
cards [1] - 43:2
care [2] - 71:1, 100:7
cared [2] - 72:6, 72:7
Carr [1] - 1:18
CARR [1] - 2:3
case [10] - 5:7, 5:8,
5:15, 87:23, 94:2,
97:5, 99:11, 110:9,
120:19, 131:21
cast [2] - 62:17, 62:18
caused [1] - 75:25
causing [1] - 76:23

cell [3] - 41:7, 126:5,
126:11
Center [1] - 68:21
Central [4] - 7:9, 7:15,
8:3, 8:4
certainly [3] - 100:19,
109:18, 131:14
Certainly [2] - 70:5,
88:24
certificate [2] - 7:14,
12:24
certification [3] - 4:6,
7:24, 136:15
certify [3] - 136:7,
136:10, 136:14
CFO [1] - 12:15
chain [2] - 105:14,
106:1
chance [4] - 5:21,
86:6, 102:12, 119:21
change [11] - 72:9,
89:24, 98:5, 110:12,
110:13, 112:20,
113:25, 129:17,
130:18, 130:21
changed [1] - 65:20
changing [7] - 14:25,
21:24, 31:20, 31:25,
32:2, 32:5, 110:16
characterized [1] -
54:5
chart [1] - 21:5
cheaper [2] - 88:12,
88:13
children [4] - 44:21,
57:2, 78:7, 126:7
Chris [1] - 134:7
Christian [1] - 66:4
Christopher [1] -
113:10
chronically [1] - 53:19
church [1] - 66:10
circle [1] - 102:19
Circuit [1] - 24:23
citizens [1] - 82:11
Civil [1] - 1:3
claim [1] - 120:19
claiming [2] - 110:14,
122:25
clarify [1] - 10:8
classes [1] - 7:22
clear [2] - 94:18,
100:13
clearly [3] - 47:6,
98:11, 113:18
clients [1] - 132:15
close [1] - 36:8
COHEN [1] - 2:8
cohort [3] - 36:4,
71:13, 128:22

coliseum [1] - 129:21
colleagues [1] - 13:1
College [2] - 7:9, 7:15
college [1] - 8:2
collude [1] - 125:12
comfortable [4] -
36:19, 102:3, 108:6,
119:5
coming [7] - 39:25,
54:23, 65:2, 72:2,
84:18, 114:21,
133:13
comment [2] - 47:20,
130:2
commentary [2] -
17:20, 72:22
comments [9] - 18:7,
18:9, 18:13, 101:7,
102:7, 102:24,
103:3, 103:6, 103:11
Commission [1] -
136:22
commissioned [1] -
136:6
committee [43] -
22:25, 23:2, 23:3,
23:5, 23:16, 23:18,
23:22, 23:25, 24:13,
27:6, 27:14, 28:3,
28:9, 28:17, 29:6,
29:7, 31:20, 31:21,
32:5, 33:1, 33:8,
33:19, 34:7, 34:11,
34:13, 34:19, 35:13,
35:20, 36:10, 36:25,
37:6, 37:9, 37:11,
37:15, 38:15, 71:11,
107:24, 108:5,
108:13, 108:16,
109:2, 109:14,
128:17
Committee [1] - 11:15
committees [1] -
68:12
COMMON [1] - 1:1
Commonwealth [2] -
136:3, 136:7
communicated [1] -
15:4
communicating [2] -
71:19, 111:23
communication [1] -
90:12
communications [4] -
80:17, 80:23, 92:6,
111:20
community [5] -
13:17, 15:2, 114:8,
126:10, 126:18
company [3] - 5:9,

8:16, 9:11 compare [1] - 69:12 compared [1] - 88:6 comparing [1] - 86:18 comparison [2] - 16:6, 88:19 comparisons [1] - 16:7 competitors [3] - 22:7, 22:15, 22:22 complaint [5] - 5:10, 14:8, 115:22, 117:8, 117:16 complaints [1] - 89:6 complete [1] - 42:21 completed [1] - 12:24 completely [2] - 14:10, 16:2 completeness [1] - 91:1 complications [1] - 57:1 comport [1] - 86:16 computer [1] - 136:12 concern [2] - 10:10, 15:16 concerned [4] - 34:6, 70:2, 122:4, 130:1 concerning [2] - 80:24, 136:9 concerns [2] - 36:25, 108:4 conclude [1] - 50:17 concluded [2] - 63:10, 135:17 conclusion [7] - 38:12, 58:10, 58:16, 62:4, 62:8, 120:23, 133:13 conclusions [1] - 38:17 condescending [1] - 56:16 condition [1] - 76:20 conduct [5] - 33:13, 67:10, 67:13, 67:21, 70:17 confer [1] - 120:22 conferred [1] - 10:9 confidence [1] - 72:8 confident [2] - 72:11, 97:24 confidential [2] - 14:6, 76:10 confirm [2] - 9:23, 91:14 confirming [1] - 9:19 connection [2] - 11:22, 15:17 conscience [1] -	81:11 considered [2] - 44:25, 114:12 consistent [1] - 51:5 constituent [1] - 126:4 constituents [16] - 15:8, 15:11, 15:13, 54:21, 54:22, 72:6, 84:6, 84:7, 84:24, 109:5, 109:12, 115:9, 115:14, 124:2, 126:19, 127:7 constitutional [1] - 13:17 construct [1] - 112:5 consult [2] - 6:25, 132:15 consulting [2] - 97:1, 97:3 contact [7] - 41:5, 73:13, 77:14, 90:24, 94:4, 97:15, 97:23 contacted [3] - 89:22, 90:9, 106:24 contents [1] - 109:23 context [1] - 5:6 continue [5] - 13:19, 35:16, 42:22, 87:9, 100:11 continued [1] - 7:10 continues [2] - 8:25, 22:10 continuing [2] - 41:4, 45:5 contract [2] - 22:5, 125:23 contracts [1] - 78:15 control [1] - 136:16 controversy [1] - 136:9 conversation [6] - 42:22, 44:10, 101:2, 106:12, 107:16, 114:18 conversations [5] - 52:15, 68:2, 78:17, 100:20, 100:22 convince [1] - 52:15 convinced [2] - 52:8, 52:11 Cooper [3] - 1:3, 116:23, 117:23 copies [2] - 101:7, 102:9 copy [5] - 61:12, 91:9, 91:20, 101:21, 136:12 corner [1] - 26:6 correct [20] - 5:18, 21:12, 23:1, 23:23,	31:23, 34:4, 39:14, 41:20, 62:12, 87:12, 102:25, 106:17, 109:25, 111:10, 121:3, 121:10, 131:1, 133:8, 134:19, 136:12 Correct [5] - 5:19, 20:17, 21:3, 28:19, 69:14 correctly [4] - 20:15, 71:2, 92:17, 93:6 costs [1] - 22:15 counsel [3] - 4:3, 10:9, 136:14 Counsel [2] - 2:6, 2:11 counted [1] - 103:2 County [3] - 11:14, 136:1, 136:7 COUNTY [1] - 1:1 couple [9] - 25:12, 48:18, 59:10, 61:7, 79:9, 85:20, 128:1, 132:13, 132:25 course [5] - 31:10, 47:19, 72:6, 74:8, 134:17 COURT [1] - 1:1 court [4] - 6:2, 14:8, 14:10, 14:11 Court [4] - 1:21, 24:23, 117:21, 118:7 courtesy [3] - 98:5, 130:8, 130:10 COVID [7] - 12:13, 15:9, 15:17, 16:9, 21:20, 52:5 Cox [10] - 1:10, 2:16, 19:3, 19:7, 20:1, 29:24, 30:21, 31:7, 54:7, 78:21 creating [1] - 12:5 critical [1] - 53:12 crossed [1] - 128:22 Cumberland [6] - 11:14, 16:5, 103:25, 104:9, 107:8, 114:7 curriculum [2] - 18:16, 84:7	113:20 dates [5] - 24:2, 25:2, 27:4, 27:11, 27:14 David [7] - 1:9, 37:10, 40:2, 41:1, 79:2, 79:4, 110:10 David's [1] - 112:7 Davis [9] - 1:10, 2:16, 75:24, 76:19, 77:1, 77:14, 78:4, 78:12, 79:18 days [2] - 48:18, 82:6 days' [1] - 134:10 deadlines [2] - 18:23, 28:5 deal [2] - 57:23, 57:24 dealing [2] - 11:23, 12:4 December [2] - 11:5, 11:6 decide [1] - 83:24 decided [2] - 85:16, 85:17 decides [1] - 111:13 decision [6] - 35:15, 35:19, 35:22, 36:7, 36:10, 134:12 decisions [1] - 125:9 decorum [5] - 19:12, 29:25, 30:11, 30:24, 31:5 defend [1] - 17:25 defendant [1] - 9:7 defendants [1] - 5:12 Defendants [2] - 1:11, 2:11 defenses [2] - 117:20, 118:20 define [1] - 109:23 Define [3] - 11:25, 12:6, 87:15 definitely [1] - 26:13 degree [1] - 7:10 deliberation [6] - 125:4, 127:1, 130:23, 133:3, 133:7, 133:11 deliberations [1] - 126:24 demands [1] - 71:11 denies [2] - 73:25, 74:15 Department [1] - 16:1 DEPONENT [13] - 1:14, 3:1, 5:1, 9:17, 9:25, 90:3, 90:5, 116:1, 117:9, 118:21, 118:24, 119:1, 120:12 Deponent [1] - 10:9	deponent/witness [1] - 136:8 deposition [6] - 4:4, 5:4, 5:15, 5:22, 5:24, 135:16 depositions [1] - 10:6 derogatory [1] - 17:20 described [1] - 64:5 desire [1] - 34:6 desk [2] - 43:3, 43:10 despicable [2] - 66:3, 67:14 detail [2] - 16:16, 95:17 details [5] - 9:24, 10:17, 10:20, 16:17, 66:19 detector [1] - 74:24 determined [1] - 39:25 detrimental [1] - 126:6 dialed [1] - 25:10 difference [1] - 133:2 different [5] - 24:21, 25:5, 86:9, 91:19, 94:11 difficult [1] - 6:20 difficulty [4] - 16:13, 16:15, 16:18, 21:11 diluted [4] - 39:5, 39:9, 39:12, 39:14 direct [2] - 35:3, 136:16 directly [1] - 118:18 director [1] - 111:20 directors [1] - 98:3 Directors [2] - 1:8, 124:23 disagreed [1] - 28:24 disagreement [1] - 34:5 disapproval [1] - 103:6 disaster [1] - 72:5 disband [2] - 36:10, 128:16 discovery [13] - 4:5, 23:4, 26:7, 49:11, 51:4, 59:24, 60:16, 61:6, 61:19, 91:9, 113:17, 123:17, 123:21 discuss [8] - 50:10, 64:12, 68:14, 77:10, 77:11, 78:11, 78:13, 83:6 discussed [14] - 24:9, 24:13, 34:9, 34:11, 78:14, 80:2, 81:23, 82:14, 82:23, 83:3, 83:11, 92:23, 93:23,
---	---	---	--	--

D

damage [2] - 55:17
dark [1] - 40:24
date [5] - 47:1, 47:5, 77:4, 119:16, 131:2
DATE [1] - 1:16
Dated [1] - 136:17
dated [4] - 89:14, 92:25, 106:23,

114:25 discussing [1] - 133:12 Discussion [2] - 76:16, 119:9 discussion [12] - 31:24, 31:25, 32:10, 50:16, 58:8, 65:19, 65:21, 68:17, 79:3, 84:15, 96:20, 108:22 discussions [2] - 80:7, 88:8 dishonest [1] - 72:23 disparage [1] - 100:12 disparaging [7] - 29:18, 29:22, 54:6, 54:15, 54:16, 70:24, 130:3 disrespectful [1] - 36:6 disruptive [1] - 33:18 dissatisfaction [1] - 16:11 disseminate [1] - 17:17 disseminated [2] - 24:12, 74:21 distinguish [1] - 126:24 distribute [1] - 92:22 distributed [1] - 130:17 district [19] - 13:22, 18:17, 44:20, 52:10, 52:17, 58:7, 62:6, 63:25, 68:5, 87:12, 100:10, 104:10, 104:18, 115:15, 115:22, 117:16, 117:19, 119:15, 126:17 District [13] - 1:9, 3:8, 3:14, 3:16, 13:15, 104:1, 110:6, 110:21, 112:10, 117:3, 118:3, 124:23, 127:17 districts [2] - 24:22, 25:9 disturbing [1] - 64:20 docket [2] - 14:1, 14:3 document [5] - 26:8, 26:10, 27:5, 89:16, 119:17 documents [2] - 59:10, 113:16 DocuScript [4] - 8:18, 9:7, 10:20, 12:12 done [22] - 7:12, 18:24, 29:15, 47:10,	47:13, 52:12, 55:17, 55:18, 57:3, 58:3, 66:5, 66:13, 71:11, 71:21, 96:25, 99:23, 106:20, 112:21, 112:25, 127:25, 128:3, 135:14 door [1] - 76:15 doubt [2] - 91:18, 91:21 down [9] - 6:17, 33:7, 34:15, 36:1, 41:4, 56:18, 65:8, 85:13, 88:24 Dr [45] - 17:16, 17:19, 18:1, 19:8, 20:4, 20:16, 20:19, 21:16, 21:21, 28:21, 30:5, 30:9, 31:5, 31:8, 32:24, 33:4, 33:24, 34:22, 40:17, 40:25, 46:16, 48:24, 49:2, 54:5, 54:16, 54:18, 54:22, 55:9, 55:23, 64:4, 65:4, 65:8, 67:5, 70:18, 70:21, 70:23, 71:9, 72:1, 84:3, 84:9, 85:4, 100:2, 103:18, 109:9 drama [1] - 49:20 drawer [1] - 43:3 drive [1] - 56:23 Drive [2] - 1:23, 5:2 drivers [2] - 56:20, 56:23 driving [1] - 57:1 due [4] - 13:16, 15:25, 82:8, 113:25 duly [5] - 4:12, 117:4, 118:4, 136:6, 136:8 duly-elected [1] - 117:4 During [2] - 80:17, 133:19 during [11] - 13:10, 24:9, 45:25, 50:9, 51:11, 52:14, 65:25, 67:1, 68:1, 80:22, 101:3 duties [1] - 11:16 duty [1] - 6:3 dying [1] - 116:6	101:10, 101:11, 105:14, 105:25, 106:1, 113:9, 113:12, 113:13, 113:20, 116:3, 121:9, 130:24, 134:3 E-mail [5] - 3:13, 3:15, 3:17, 3:20, 3:23 e-mails [2] - 91:20, 105:18 Eagle [1] - 7:7 early [4] - 24:6, 52:25, 66:24, 95:15 earned [1] - 7:14 easier [1] - 91:12 East [2] - 1:19, 2:4 easy [2] - 47:1, 56:21 economic [1] - 68:18 edit [1] - 38:20 educate [1] - 125:16 educated [1] - 66:10 education [1] - 7:11 educational [4] - 7:6, 45:9, 51:14, 52:12 effectively [1] - 110:15 eighth [2] - 134:5, 134:7 Eisenhower [6] - 107:4, 113:10, 114:11, 130:25, 134:2, 134:4 either [16] - 11:22, 12:7, 16:11, 17:11, 23:12, 23:13, 33:1, 35:20, 57:18, 60:20, 60:25, 67:21, 73:7, 79:3, 82:7, 117:19 elaborate [1] - 125:18 elbows [4] - 29:3, 36:1, 65:11, 71:14 elected [6] - 10:25, 13:18, 63:4, 115:16, 117:4, 118:5 election [4] - 44:2, 115:17, 115:18, 135:3 electronic [1] - 101:7 electronically [1] - 102:8 Elizabeth [2] - 43:14, 43:23 ELLIOTT [39] - 2:3, 4:15, 4:25, 5:3, 9:18, 10:4, 10:18, 25:24, 38:13, 59:5, 59:9, 59:14, 76:17, 76:18, 89:9, 90:7, 91:1, 91:5, 91:25, 101:15, 105:10, 107:19, 113:6, 116:10,	116:15, 117:11, 118:17, 119:2, 119:12, 120:13, 124:10, 124:14, 124:16, 124:19, 132:13, 132:19, 132:24, 135:10, 135:13 Elliott [8] - 1:3, 3:3, 4:17, 116:23, 117:24 embroided [1] - 13:22 emergency [7] - 70:1, 70:2, 70:14, 71:7, 99:22, 100:6, 100:8 employ [1] - 104:16 employed [8] - 8:1, 8:6, 8:14, 8:15, 8:23, 9:4, 9:6, 54:20 employee [2] - 104:11, 136:14 employment [6] - 8:13, 9:19, 9:20, 10:5, 10:20, 10:21 end [5] - 37:17, 45:4, 45:18, 50:15, 85:8 ended [1] - 43:7 ends [1] - 104:15 enforce [1] - 123:5 enforcing [3] - 122:4, 123:2, 124:8 engagement [1] - 93:3 Enola [1] - 79:11 enormous [1] - 123:24 ensure [1] - 13:19 entered [3] - 48:6, 65:4, 119:8 entire [5] - 16:22, 57:9, 87:7, 92:22, 102:2 entity [1] - 18:16 envisioned [1] - 31:22 equal [1] - 105:1 escalated [1] - 100:3 ESQUIRE [2] - 2:3, 2:8 essentially [4] - 26:16, 56:1, 117:21, 134:18 Essentially [1] - 118:19 establish [1] - 112:21 estimation [1] - 95:22 evaluate [1] - 22:15 evening [3] - 62:17, 96:7, 96:12 events [1] - 52:18 evidence [8] - 120:19, 120:21, 122:2, 122:10, 122:14, 122:17, 124:6, 135:6 exactly [1] - 109:16 EXAMINATION [4] -	3:2, 4:14, 124:20, 132:23 Examine [1] - 102:3 examine [2] - 22:21, 102:2 examined [1] - 22:18 examining [1] - 112:25 example [4] - 21:13, 56:19, 64:3, 70:8 examples [6] - 21:15, 21:17, 56:13, 56:14, 57:18, 64:11 except [2] - 4:7, 69:20 Except [1] - 72:6 excerpts [1] - 59:22 Exchange [5] - 3:13, 3:15, 3:17, 3:20, 3:23 exchange [8] - 89:13, 91:15, 113:9, 113:12, 113:14, 121:9, 121:17, 130:24 exchanged [1] - 73:13 excuse [1] - 24:3 executive [14] - 20:22, 21:1, 50:4, 64:23, 64:24, 65:6, 67:3, 73:24, 82:22, 83:6, 83:15, 83:17, 101:3, 126:14 exercise [2] - 36:18, 123:24 EXHIBIT [1] - 3:7 Exhibit [18] - 25:22, 26:5, 89:7, 89:11, 91:3, 91:23, 92:2, 101:13, 101:17, 105:8, 105:12, 107:17, 107:21, 113:4, 113:8, 119:10, 120:11, 131:17 Exhibits [2] - 59:12, 59:16 EXHIBITS [1] - 3:6 existing [1] - 112:16 expect [1] - 29:25 expectation [1] - 38:21 expected [1] - 123:10 expecting [3] - 67:8, 96:6, 96:16 experience [10] - 11:7, 11:10, 11:20, 11:23, 12:4, 12:10, 51:13, 51:15, 51:20, 63:1 experienced [1] - 72:20
E				
e-mail [25] - 37:4, 49:22, 50:1, 89:13, 90:21, 91:10, 91:15, 92:6, 92:12, 92:20, 92:22, 92:24,				

experiences ^[1] - 58:1 Expiration ^[1] - 136:22 explain ^[1] - 110:22 explained ^[3] - 46:17, 66:9, 104:8 explanation ^[4] - 55:10, 93:18, 98:17, 98:21 explore ^[1] - 14:16 exploring ^[1] - 16:10 express ^[2] - 36:24, 80:19 expressed ^[2] - 15:16, 103:6 expressing ^[1] - 37:5 extended ^[1] - 74:14 extent ^[2] - 33:24, 60:18 extra ^[1] - 109:14 extract ^[1] - 118:17 extreme ^[2] - 71:25, 76:23 extremely ^[1] - 70:5	117:17, 118:7, 119:15, 119:17 files ^[1] - 90:13 filing ^[1] - 4:6 final ^[2] - 39:1, 125:9 finances ^[1] - 12:3 findings ^[1] - 38:16 fine ^[3] - 59:1, 84:11, 132:18 finger ^[1] - 129:23 firm ^[6] - 45:9, 45:16, 51:1, 58:18, 90:14, 111:13 firm's ^[3] - 51:13, 51:20, 62:25 firms ^[3] - 88:19, 111:10, 112:14 First ^[1] - 26:4 first ^[15] - 14:15, 14:24, 16:20, 27:1, 27:18, 41:5, 41:19, 45:3, 65:25, 74:20, 77:14, 86:10, 92:11, 124:17, 124:19 five ^[5] - 13:6, 22:5, 55:7, 98:19, 131:22 five-year ^[1] - 22:5 Floor ^[1] - 2:9 Florida ^[1] - 126:7 folks ^[3] - 29:5, 51:24, 75:7 follow ^[6] - 37:3, 50:16, 71:4, 132:14, 132:25, 135:11 follow-up ^[4] - 50:16, 132:14, 132:25, 135:11 following ^[1] - 19:10 follows ^[1] - 4:12 footnote ^[1] - 97:20 foresee ^[1] - 108:25 forgiveness ^[1] - 67:25 form ^[3] - 4:7, 71:12, 90:1 formal ^[2] - 23:3, 36:9 format ^[3] - 91:19, 101:23, 101:24 formatted ^[1] - 91:13 formed ^[7] - 22:25, 23:2, 23:10, 29:7, 31:22, 34:11, 38:15 former ^[1] - 13:20 forth ^[10] - 6:21, 27:10, 28:5, 29:14, 78:8, 78:18, 79:13, 111:21, 112:1, 133:13 forward ^[3] - 71:15, 110:7, 126:15	forwarded ^[4] - 48:17, 48:22, 94:9, 102:8 four ^[19] - 22:3, 24:13, 34:12, 37:7, 37:11, 38:19, 38:20, 63:9, 64:1, 64:8, 72:20, 73:8, 86:5, 93:3, 93:9, 111:3, 112:14, 133:21, 134:23 frame ^[1] - 8:9 friend ^[4] - 43:13, 43:25, 72:21, 78:9 friend's ^[1] - 43:10 friends ^[4] - 53:18, 55:8, 103:24, 109:18 friendships ^[2] - 64:2, 64:10 front ^[1] - 6:2 frustrations ^[1] - 37:5 fulfilling ^[1] - 47:14 full ^[8] - 38:23, 39:10, 47:8, 49:6, 64:8, 76:22, 109:3, 125:10 function ^[1] - 76:22 FURMAN ^[1] - 2:8 future ^[1] - 127:6	118:16, 119:7 GREENHALL ^[1] - 2:8 ground ^[1] - 5:23 Group ^[5] - 19:1, 30:2, 31:13, 31:17 group ^[1] - 124:3 Grow ^[1] - 18:18 growing ^[3] - 28:12, 34:14, 37:13 growth ^[1] - 68:18 guess ^[3] - 8:11, 95:21, 95:24 guessing ^[1] - 95:25 guide ^[1] - 25:7 Guistwhite ^[25] - 23:18, 28:10, 28:23, 28:25, 32:6, 33:3, 34:5, 35:7, 35:24, 36:18, 36:21, 40:4, 40:8, 40:13, 40:19, 40:25, 71:9, 75:12, 75:16, 107:25, 108:12, 108:15, 109:15, 112:6, 128:20 Guistwhite's ^[1] - 32:2 guys ^[1] - 126:8	134:24 hallway ^[1] - 65:18 handwriting ^[1] - 27:20 handwritten ^[1] - 27:17 happy ^[1] - 74:24 hard ^[1] - 84:8 Harmon ^[4] - 1:4, 2:15, 116:24, 117:24 Harrisburg ^[1] - 2:9 haul ^[2] - 87:14, 87:15 head ^[6] - 6:20, 21:18, 24:5, 58:5, 60:10, 60:11 Health ^[1] - 16:1 health ^[2] - 7:10, 126:6 hear ^[4] - 6:6, 6:7, 14:24, 67:12 heard ^[5] - 6:12, 20:15, 41:16, 90:19, 126:10 hearing ^[2] - 71:2, 114:1 hearsay ^[1] - 19:19 heavy ^[2] - 25:6, 39:15 Heidi ^[18] - 1:9, 46:15, 52:21, 65:20, 73:12, 81:7, 81:9, 92:12, 92:14, 92:20, 94:22, 98:2, 99:8, 99:12, 99:17, 119:8, 121:2, 121:6 held ^[1] - 82:22 help ^[2] - 66:13, 72:16 helped ^[5] - 10:23, 12:12, 42:25, 44:3, 115:16 helping ^[4] - 57:15, 57:19, 84:7, 109:3 hereby ^[2] - 4:2, 136:7 hereto ^[1] - 136:15 herself ^[1] - 67:22 high ^[1] - 38:3 High ^[7] - 1:4, 2:15, 7:7, 116:24, 117:25, 131:21, 135:2 High's ^[1] - 135:7 high-level ^[1] - 38:3 Hill ^[2] - 45:12, 45:13 himself ^[4] - 42:9, 51:16, 55:1, 103:18 hire ^[4] - 53:2, 71:7, 104:4, 104:6 hired ^[3] - 12:15, 62:14, 88:7 hiring ^[2] - 106:5, 106:10 his/her ^[1] - 136:9
F				
face ^[1] - 29:4 fact ^[9] - 46:14, 75:9, 89:2, 104:9, 113:25, 127:23, 131:3, 135:5, 135:7 facts ^[1] - 117:20 failed ^[1] - 55:24 fair ^[3] - 63:13, 63:19, 103:5 fairly ^[1] - 29:16 faith ^[2] - 66:10, 66:11 faith-based ^[1] - 66:11 false ^[4] - 18:3, 54:24, 64:5, 87:2 familiar ^[6] - 26:21, 26:23, 26:25, 42:24, 92:7, 92:9 far ^[6] - 39:24, 70:1, 82:3, 95:11, 128:14 fast ^[1] - 84:16 fault ^[1] - 63:2 favor ^[2] - 83:25, 98:19 February ^[4] - 20:8, 23:13, 23:14, 136:17 felt ^[9] - 25:16, 29:19, 29:20, 39:4, 53:15, 53:23, 54:2, 54:8, 100:1 few ^[4] - 21:2, 59:6, 65:2, 87:16 figure ^[2] - 13:24, 58:6 filed ^[6] - 14:8, 115:21,				
G				
G-A-L-L-O ^[1] - 43:23 Gallo ^[4] - 43:14, 43:16, 43:17, 43:24 GALLOW ^[1] - 43:19 Garrison ^[1] - 1:23 gaslighting ^[1] - 76:22 gather ^[1] - 134:11 gathering ^[2] - 126:25, 133:4 Gay ^[10] - 18:19, 19:3, 19:5, 19:7, 28:21, 31:17, 32:25, 33:5, 33:25, 34:23 general ^[1] - 60:13 generic ^[1] - 42:13 gestures ^[1] - 6:21 gist ^[1] - 18:14 given ^[16] - 5:4, 5:15, 43:1, 46:13, 49:2, 56:24, 61:5, 64:3, 73:2, 95:8, 101:7, 111:17, 116:20, 129:23, 134:23 goals ^[1] - 68:4 God ^[1] - 102:19 Google ^[1] - 25:1 government ^[4] - 11:8, 11:20, 11:21, 12:8 graduated ^[2] - 7:8, 7:9 great ^[4] - 16:16, 52:6,				
H				
half ^[1] - 64:23 Hall ^[76] - 41:6, 41:7, 42:12, 44:4, 45:21, 47:17, 50:10, 51:6, 51:16, 52:8, 53:3, 58:11, 58:16, 61:1, 61:9, 61:22, 62:5, 68:3, 68:8, 68:19, 69:17, 72:9, 72:17, 72:22, 73:2, 73:8, 73:17, 73:20, 75:9, 75:19, 77:1, 77:15, 78:5, 78:11, 78:21, 79:5, 79:25, 80:20, 80:24, 82:23, 83:2, 83:20, 86:4, 89:2, 89:14, 89:22, 90:9, 90:12, 90:24, 92:12, 92:25, 93:2, 93:19, 94:4, 94:8, 94:14, 94:15, 96:6, 97:15, 97:23, 99:1, 99:18, 107:2, 107:12, 114:11, 114:16, 114:24, 121:10, 121:20, 130:15, 131:8, 131:13, 131:16, 133:22, 134:8, 134:17 Hall's ^[3] - 43:6, 77:6,				

history [4] - 8:13, 9:19, 10:6, 86:8 Hmm [1] - 50:2 hmm [11] - 23:6, 26:19, 27:19, 43:18, 48:16, 61:25, 105:16, 108:1, 113:23, 131:19, 133:5 hmm-mm [1] - 61:25 Hmm-mm [1] - 50:2 hoc [5] - 23:5, 23:22, 24:13, 27:6, 31:20 hold [2] - 84:14, 114:20 homework [3] - 103:16, 106:20, 126:13 honest [2] - 72:23, 95:18 hoped [1] - 27:14 hopefully [2] - 72:19, 72:21 hospice [1] - 116:6 hospital [5] - 36:17, 40:2, 79:9, 79:10, 112:8 hospitalized [3] - 28:14, 28:22, 79:14 hosted [1] - 13:1 hostile [1] - 129:25 hostility [1] - 128:19 hot [1] - 71:17 hour [7] - 46:23, 49:13, 50:3, 57:11, 57:12, 64:24, 83:16 hourly [1] - 88:13 hours [3] - 13:6, 40:24, 102:20 housekeeping [1] - 59:9 huff [1] - 57:8 Hunter [1] - 1:18 HUNTER [1] - 2:3 husband [5] - 5:9, 8:21, 10:23, 12:12, 85:11 hypothetical [1] - 96:3 hypothetically [1] - 48:23 hypotheticals [1] - 95:19	94:21, 109:3, 111:22, 116:14, 134:25 ideal [2] - 105:4, 106:19 identification [13] - 25:23, 59:13, 59:18, 89:8, 89:11, 91:4, 91:24, 92:2, 101:14, 105:9, 107:18, 113:5, 119:11 identified [1] - 107:23 ignorant [1] - 84:20 ill [1] - 7:20 ill [2] - 76:24, 79:8 illegitimate [4] - 117:1, 118:2, 120:20, 122:12 imagine [2] - 98:7, 133:12 immediately [1] - 71:8 impact [2] - 52:7, 94:9 impacted [1] - 38:25 impacting [1] - 34:2 importance [1] - 110:11 important [7] - 29:19, 63:20, 69:16, 69:20, 87:11, 87:12, 105:3 imposing [2] - 117:1, 118:2 IN [1] - 1:1 in-between [1] - 13:7 in-person [1] - 79:16 inability [1] - 76:22 inaccurate [1] - 61:24 inappropriately [1] - 40:14 include [6] - 25:19, 28:11, 28:17, 31:9, 32:7, 33:4 included [8] - 32:3, 32:12, 32:13, 32:17, 32:18, 39:22, 93:24, 96:13 including [1] - 32:11 incoming [1] - 60:21 incomplete [1] - 7:13 incorporate [1] - 25:13 incorrect [1] - 103:13 Independence [1] - 68:21 independent [1] - 61:20 INDEX [2] - 3:1, 3:6 indicate [2] - 30:9, 51:4 indicated [5] - 31:19, 69:6, 70:13, 102:7,	134:16 indicates [1] - 114:5 individual [1] - 114:7 individually [1] - 58:22 inform [2] - 89:23, 98:5 information [16] - 12:23, 14:7, 26:6, 50:25, 71:5, 73:13, 93:1, 93:2, 94:8, 115:7, 116:22, 117:22, 126:25, 127:4, 133:3, 134:12 informed [1] - 134:12 initial [3] - 44:6, 46:13, 50:9 input [10] - 29:10, 33:22, 34:7, 35:3, 37:10, 38:25, 39:4, 39:5, 39:14, 39:20 inquire [1] - 10:5 instance [3] - 21:16, 41:19, 54:4 instances [2] - 54:7, 64:6 instruct [1] - 20:16 instructed [3] - 21:14, 47:6, 55:12 instruction [2] - 46:18, 48:13 insubordination [1] - 70:25 intended [3] - 122:19, 122:20, 122:21 intending [1] - 53:7 intent [1] - 124:7 intention [3] - 41:2, 54:12, 123:1 intentionally [2] - 55:24, 71:22 interaction [1] - 64:19 interest [2] - 44:21, 124:7 interested [1] - 44:25 interesting [2] - 33:8, 50:7 interests [1] - 100:15 interpret [1] - 125:25 interruption [1] - 9:5 interview [2] - 68:25, 130:15 interviewed [1] - 111:21 interviewing [2] - 83:9, 112:25 interviews [1] - 71:5 intimidating [1] - 71:23 intimidation [1] -	36:18 intro [1] - 7:20 introduce [1] - 42:9 introduction [1] - 42:13 invite [3] - 32:4, 34:21, 38:8 invited [2] - 65:7, 65:16 involved [8] - 5:8, 9:12, 9:21, 10:11, 10:21, 98:11, 112:3, 114:7 involves [1] - 12:22 irrelevant [2] - 37:20, 37:25 issue [1] - 21:21 issued [4] - 22:3, 127:18, 128:5, 128:8 issues [2] - 125:16, 126:20 issuing [1] - 127:21 It'll [1] - 41:21 item [3] - 82:14, 94:14, 95:4 items [10] - 78:14, 79:9, 92:15, 93:4, 93:9, 93:20, 93:22, 102:23, 121:22, 126:20 itself [3] - 16:25, 32:5, 39:3	judge [1] - 6:2 jumped [1] - 57:5 June [2] - 93:16, 136:22
K				
Kambic [9] - 75:8, 113:10, 115:4, 130:25, 131:7, 131:12, 134:1, 134:4, 134:7 Kambic's [1] - 134:14 Katherine [3] - 1:4, 116:24, 117:25 KB [1] - 108:5 keep [2] - 76:12, 85:13 keeps [1] - 54:19 KELLY [1] - 4:10 Kelly [7] - 1:9, 1:14, 4:21, 37:23, 42:11, 106:6, 108:14 kept [1] - 54:11 Kevin [39] - 41:6, 41:7, 42:11, 43:6, 44:4, 45:21, 51:6, 51:15, 52:8, 53:3, 58:11, 58:16, 60:25, 61:8, 61:22, 62:5, 69:4, 69:17, 72:9, 73:2, 73:8, 73:17, 73:20, 75:9, 75:19, 82:23, 83:2, 83:20, 89:13, 92:12, 93:2, 93:19, 94:8, 106:24, 107:2, 107:12, 114:16, 114:24, 130:15 Kevin's [1] - 61:14 kids [2] - 15:20, 56:24 Kilby [3] - 1:20, 136:6, 136:20 kind [9] - 5:23, 16:15, 36:13, 43:11, 44:22, 55:5, 104:18, 120:20, 122:17 kinds [1] - 126:16 knocked [1] - 76:14 knowing [3] - 33:7, 97:24, 99:2 knowingly [1] - 85:1 knowledge [5] - 49:14, 61:20, 115:7, 118:10, 136:9 known [4] - 20:19, 95:9, 114:11, 115:3 knows [2] - 66:8, 91:22				
J				
Jan [3] - 1:4, 116:24, 117:25 Jane [3] - 1:5, 116:25, 118:1 January [9] - 1:16, 11:3, 12:25, 13:8, 46:14, 48:14, 66:22, 66:23, 74:19 Jarrett [3] - 1:4, 116:24, 117:25 jbonn@cohenseglias.com [1] - 2:10 Jeff [4] - 1:4, 2:15, 116:24, 117:24 Jesse [3] - 1:5, 116:25, 117:25 jnellottesq@comcast.net [1] - 2:5 job [1] - 63:7 John [4] - 1:3, 4:17, 116:23, 117:24 JOHN [1] - 2:3 Josh [2] - 5:18, 124:22 JOSHUA [1] - 2:8				
I				
idea [19] - 14:24, 42:1, 44:5, 45:4, 68:10, 68:13, 73:4, 77:21, 80:5, 80:16, 81:16, 91:21, 93:21, 94:6,				

L				
lack [5] - 19:12, 30:10, 30:24, 31:4	less [1] - 88:22	89:13, 90:21, 91:10, 91:15, 92:6, 92:12, 92:20, 92:22, 92:24, 101:10, 101:11, 105:14, 105:25, 106:1, 113:9, 113:12, 113:13, 113:20, 116:3, 121:9, 130:24, 134:3	Matter [1] - 3:25	82:11, 82:13, 82:15, 83:2, 83:13, 83:15, 84:11, 84:18, 86:7, 88:15, 89:25, 90:23, 92:15, 93:4, 93:9, 93:20, 94:5, 94:10, 94:15, 95:3, 96:14, 96:21, 101:6, 101:9, 101:19, 101:22, 102:5, 102:17, 102:18, 114:24, 120:23, 121:8, 121:22, 125:10, 125:14, 127:4, 128:25, 129:15, 129:19, 129:20, 130:17, 131:1, 131:9, 133:8, 133:23
lacked [1] - 29:24	letter [2] - 93:3, 97:19	mails [2] - 91:20, 105:18	matter [12] - 4:18, 9:8, 9:13, 13:17, 59:10, 115:21, 115:23, 116:21, 117:18, 119:15, 127:23, 131:3	83:2, 83:13, 83:15, 84:11, 84:18, 86:7, 88:15, 89:25, 90:23, 92:15, 93:4, 93:9, 93:20, 94:5, 94:10, 94:15, 95:3, 96:14, 96:21, 101:6, 101:9, 101:19, 101:22, 102:5, 102:17, 102:18, 114:24, 120:23, 121:8, 121:22, 125:10, 125:14, 127:4, 128:25, 129:15, 129:19, 129:20, 130:17, 131:1, 131:9, 133:8, 133:23
ladies [1] - 42:25	level [1] - 38:3	main [1] - 51:21	matters [2] - 10:12, 136:9	83:2, 83:13, 83:15, 84:11, 84:18, 86:7, 88:15, 89:25, 90:23, 92:15, 93:4, 93:9, 93:20, 94:5, 94:10, 94:15, 95:3, 96:14, 96:21, 101:6, 101:9, 101:19, 101:22, 102:5, 102:17, 102:18, 114:24, 120:23, 121:8, 121:22, 125:10, 125:14, 127:4, 128:25, 129:15, 129:19, 129:20, 130:17, 131:1, 131:9, 133:8, 133:23
laid [1] - 130:11	Lewisberry [1] - 5:2	majority [13] - 53:10, 63:15, 63:16, 85:25, 103:6, 104:7, 110:3, 112:20, 113:24, 114:4, 117:3, 118:4, 131:23	mayor [1] - 107:8	83:2, 83:13, 83:15, 84:11, 84:18, 86:7, 88:15, 89:25, 90:23, 92:15, 93:4, 93:9, 93:20, 94:5, 94:10, 94:15, 95:3, 96:14, 96:21, 101:6, 101:9, 101:19, 101:22, 102:5, 102:17, 102:18, 114:24, 120:23, 121:8, 121:22, 125:10, 125:14, 127:4, 128:25, 129:15, 129:19, 129:20, 130:17, 131:1, 131:9, 133:8, 133:23
Lancaster [2] - 136:1, 136:7	lie [1] - 74:24	manage [1] - 12:11	mean [18] - 9:14, 16:18, 17:15, 36:5, 37:19, 41:23, 43:4, 53:9, 54:15, 70:13, 95:18, 106:11, 115:14, 122:22, 129:4, 129:6, 129:24, 134:3	83:2, 83:13, 83:15, 84:11, 84:18, 86:7, 88:15, 89:25, 90:23, 92:15, 93:4, 93:9, 93:20, 94:5, 94:10, 94:15, 95:3, 96:14, 96:21, 101:6, 101:9, 101:19, 101:22, 102:5, 102:17, 102:18, 114:24, 120:23, 121:8, 121:22, 125:10, 125:14, 127:4, 128:25, 129:15, 129:19, 129:20, 130:17, 131:1, 131:9, 133:8, 133:23
landed [1] - 22:16	lies [3] - 87:2, 109:10, 111:6	mandate [2] - 15:19, 16:9	means [5] - 117:1, 118:2, 125:24, 133:11, 136:15	83:2, 83:13, 83:15, 84:11, 84:18, 86:7, 88:15, 89:25, 90:23, 92:15, 93:4, 93:9, 93:20, 94:5, 94:10, 94:15, 95:3, 96:14, 96:21, 101:6, 101:9, 101:19, 101:22, 102:5, 102:17, 102:18, 114:24, 120:23, 121:8, 121:22, 125:10, 125:14, 127:4, 128:25, 129:15, 129:19, 129:20, 130:17, 131:1, 131:9, 133:8, 133:23
language [5] - 31:10, 35:25, 75:14, 99:25	life [3] - 10:3, 74:16, 122:20	mandated [1] - 15:25	meant [1] - 25:6	83:2, 83:13, 83:15, 84:11, 84:18, 86:7, 88:15, 89:25, 90:23, 92:15, 93:4, 93:9, 93:20, 94:5, 94:10, 94:15, 95:3, 96:14, 96:21, 101:6, 101:9, 101:19, 101:22, 102:5, 102:17, 102:18, 114:24, 120:23, 121:8, 121:22, 125:10, 125:14, 127:4, 128:25, 129:15, 129:19, 129:20, 130:17, 131:1, 131:9, 133:8, 133:23
laptop [2] - 65:5, 65:10	light [2] - 18:5, 69:23	mandates [1] - 16:6	measure [1] - 33:15	83:2, 83:13, 83:15, 84:11, 84:18, 86:7, 88:15, 89:25, 90:23, 92:15, 93:4, 93:9, 93:20, 94:5, 94:10, 94:15, 95:3, 96:14, 96:21, 101:6, 101:9, 101:19, 101:22, 102:5, 102:17, 102:18, 114:24, 120:23, 121:8, 121:22, 125:10, 125:14, 127:4, 128:25, 129:15, 129:19, 129:20, 130:17, 131:1, 131:9, 133:8, 133:23
large [3] - 11:24, 11:25, 103:5	line [1] - 62:1	mandating [1] - 15:21	media [1] - 126:6	83:2, 83:13, 83:15, 84:11, 84:18, 86:7, 88:15, 89:25, 90:23, 92:15, 93:4, 93:9, 93:20, 94:5, 94:10, 94:15, 95:3, 96:14, 96:21, 101:6, 101:9, 101:19, 101:22, 102:5, 102:17, 102:18, 114:24, 120:23, 121:8, 121:22, 125:10, 125:14, 127:4, 128:25, 129:15, 129:19, 129:20, 130:17, 131:1, 131:9, 133:8, 133:23
larger [1] - 28:12	list [1] - 61:6	Mandy [5] - 1:10, 2:16, 73:12, 75:21, 78:12	medical [1] - 7:23	83:2, 83:13, 83:15, 84:11, 84:18, 86:7, 88:15, 89:25, 90:23, 92:15, 93:4, 93:9, 93:20, 94:5, 94:10, 94:15, 95:3, 96:14, 96:21, 101:6, 101:9, 101:19, 101:22, 102:5, 102:17, 102:18, 114:24, 120:23, 121:8, 121:22, 125:10, 125:14, 127:4, 128:25, 129:15, 129:19, 129:20, 130:17, 131:1, 131:9, 133:8, 133:23
last [12] - 35:4, 35:12, 43:15, 45:24, 50:21, 58:8, 62:1, 74:7, 75:1, 77:20, 92:23, 119:20	listed [2] - 60:22, 102:24	manifest [1] - 16:25	meet [4] - 23:25, 28:4, 86:6, 86:24	83:2, 83:13, 83:15, 84:11, 84:18, 86:7, 88:15, 89:25, 90:23, 92:15, 93:4, 93:9, 93:20, 94:5, 94:10, 94:15, 95:3, 96:14, 96:21, 101:6, 101:9, 101:19, 101:22, 102:5, 102:17, 102:18, 114:24, 120:23, 121:8, 121:22, 125:10, 125:14, 127:4, 128:25, 129:15, 129:19, 129:20, 130:17, 131:1, 131:9, 133:8, 133:23
Law [2] - 1:3, 68:21	listen [2] - 18:10, 114:2	manner [2] - 55:11, 55:25	Meeting [1] - 3:18	83:2, 83:13, 83:15, 84:11, 84:18, 86:7, 88:15, 89:25, 90:23, 92:15, 93:4, 93:9, 93:20, 94:5, 94:10, 94:15, 95:3, 96:14, 96:21, 101:6, 101:9, 101:19, 101:22, 102:5, 102:17, 102:18, 114:24, 120:23, 121:8, 121:22, 125:10, 125:14, 127:4, 128:25, 129:15, 129:19, 129:20, 130:17, 131:1, 131:9, 133:8, 133:23
law [10] - 12:18, 45:9, 51:14, 51:25, 52:12, 103:21, 111:10, 112:14, 123:2, 123:5	listens [1] - 114:2	marathon [1] - 7:2	meeting [142] - 11:18, 13:11, 18:1, 18:3, 18:10, 18:16, 18:25, 19:2, 19:6, 19:14, 19:17, 19:19, 20:4, 20:12, 20:20, 24:8, 28:15, 28:22, 30:2, 30:6, 30:14, 30:16, 30:18, 31:12, 31:13, 31:15, 33:10, 33:13, 35:5, 35:8, 35:10, 35:12, 35:21, 35:23, 36:8, 36:12, 37:21, 39:24, 40:1, 40:21, 41:2, 41:3, 45:18, 45:22, 46:1, 46:16, 46:24, 47:4, 47:5, 48:6, 49:13, 49:16, 50:3, 50:9, 50:15, 50:17, 50:21, 52:22, 53:8, 53:24, 54:25, 58:21, 64:23, 64:25, 65:1, 65:13, 65:23, 66:20, 66:23, 67:2, 67:5, 67:9, 68:24, 71:10, 72:4, 73:9, 73:16, 73:19, 74:22, 75:17, 77:1, 77:8, 77:20, 78:3, 78:11, 79:17, 79:22, 79:25, 80:3, 80:13, 81:17, 81:18, 81:22, 82:4,	83:2, 83:13, 83:15, 84:11, 84:18, 86:7, 88:15, 89:25, 90:23, 92:15, 93:4, 93:9, 93:20, 94:5, 94:10, 94:15, 95:3, 96:14, 96:21, 101:6, 101:9, 101:19, 101:22, 102:5, 102:17, 102:18, 114:24, 120:23, 121:8, 121:22, 125:10, 125:14, 127:4, 128:25, 129:15, 129:19, 129:20, 130:17, 131:1, 131:9, 133:8, 133:23
lawsuit [18] - 10:17, 13:14, 13:22, 13:25, 15:6, 16:8, 16:19, 21:20, 60:3, 60:8, 117:1, 118:1, 122:13, 123:9, 123:12, 124:7, 132:5, 132:8	live [3] - 22:12, 106:19, 129:23	March [11] - 24:6, 24:7, 35:10, 41:9, 41:18, 51:6, 52:25, 85:10, 106:23, 134:18	meets [1] - 111:13	83:2, 83:13, 83:15, 84:11, 84:18, 86:7, 88:15, 89:25, 90:23, 92:15, 93:4, 93:9, 93:20, 94:5, 94:10, 94:15, 95:3, 96:14, 96:21, 101:6, 101:9, 101:19, 101:22, 102:5, 102:17, 102:18, 114:24, 120:23, 121:8, 121:22, 125:10, 125:14, 127:4, 128:25, 129:15, 129:19, 129:20, 130:17, 131:1, 131:9, 133:8, 133:23
lawyer [1] - 111:13	lives [1] - 115:15	mark [4] - 59:11, 61:6, 91:2, 116:11	member [9] - 47:25, 68:11, 79:17, 92:23, 98:25, 126:9, 126:23, 127:10, 127:14	83:2, 83:13, 83:15, 84:11, 84:18, 86:7, 88:15, 89:25, 90:23, 92:15, 93:4, 93:9, 93:20, 94:5, 94:10, 94:15, 95:3, 96:14, 96:21, 101:6, 101:9, 101:19, 101:22, 102:5, 102:17, 102:18, 114:24, 120:23, 121:8, 121:22, 125:10, 125:14, 127:4, 128:25, 129:15, 129:19, 129:20, 130:17, 131:1, 131:9, 133:8, 133:23
lead [2] - 18:25, 20:24	living [1] - 105:7	marked [27] - 25:22, 26:1, 26:5, 59:12, 59:15, 59:18, 61:12, 89:7, 89:10, 91:3, 91:6, 91:8, 91:23, 92:1, 101:13, 101:17, 105:8, 105:11, 107:17, 107:20, 113:4, 113:7, 113:8, 119:10, 119:13, 120:11	members [68] - 17:21, 18:5, 18:15, 18:25, 19:21, 19:25, 24:12, 28:17, 28:23, 29:1, 29:11, 30:1, 31:18, 36:25, 37:8, 38:2, 46:20, 49:6, 49:23, 52:19, 53:13, 53:18, 53:22, 54:19, 54:25, 57:21, 57:25, 63:3, 63:4, 63:9, 63:24, 64:1, 64:2, 64:9, 64:12, 66:2, 70:18, 72:19, 72:21, 72:25, 73:1, 73:8, 75:19, 80:18, 80:24, 86:1, 86:2, 86:3, 86:5, 86:6, 86:22, 89:1, 89:3, 100:10, 107:2, 108:13, 108:18, 111:3, 117:4, 118:5, 121:3, 122:24, 125:16, 131:13, 131:23, 133:21, 134:23	83:2, 83:13, 83:15, 84:11, 84:18, 86:7, 88:15, 89:25, 90:23, 92:15, 93:4, 93:9, 93:20, 94:5, 94:10, 94:15, 95:3, 96:14, 96:21, 101:6, 101:9, 101:19, 101:22, 102:5, 102:17, 102:18, 114:24, 120:23, 121:8, 121:22, 125:10, 125:14, 127:4, 128:25, 129:15, 129:19, 129:20, 130:17, 131:1, 131:9, 133:8, 133:23
Leader [4] - 16:12, 16:14, 17:12, 22:17	LLP [2] - 1:18, 2:3	marathon [1] - 7:2		83:2, 83:13, 83:15, 84:11, 84:18, 86:7, 88:15, 89:25, 90:23, 92:15, 93:4, 93:9, 93:20, 94:5, 94:10, 94:15, 95:3, 96:14, 96:21, 101:6, 101:9, 101:19, 101:22, 102:5, 102:17, 102:18, 114:24, 120:23, 121:8, 121:22, 125:10, 125:14, 127:4, 128:25, 129:15, 129:19, 129:20, 130:17, 131:1, 131:9, 133:8, 133:23
Leader's [3] - 88:13, 88:14, 88:23	log [1] - 60:22	March [11] - 24:6, 24:7, 35:10, 41:9, 41:18, 51:6, 52:25, 85:10, 106:23, 134:18		83:2, 83:13, 83:15, 84:11, 84:18, 86:7, 88:15, 89:25, 90:23, 92:15, 93:4, 93:9, 93:20, 94:5, 94:10, 94:15, 95:3, 96:14, 96:21, 101:6, 101:9, 101:19, 101:22, 102:5, 102:17, 102:18, 114:24, 120:23, 121:8, 121:22, 125:10, 125:14, 127:4, 128:25, 129:15, 129:19, 129:20, 130:17, 131:1, 131:9, 133:8, 133:23
leadership [1] - 47:14	logs [3] - 51:6, 51:9, 60:15	manif [1] - 16:25		83:2, 83:13, 83:15, 84:11, 84:18, 86:7, 88:15, 89:25, 90:23, 92:15, 93:4, 93:9, 93:20, 94:5, 94:10, 94:15, 95:3, 96:14, 96:21, 101:6, 101:9, 101:19, 101:22, 102:5, 102:17, 102:18, 114:24, 120:23, 121:8, 121:22, 125:10, 125:14, 127:4, 128:25, 129:15, 129:19, 129:20, 130:17, 131:1, 131:9, 133:8, 133:23
Leah [3] - 1:3, 116:23, 117:23	long-term [1] - 87:11	manner [2] - 55:11, 55:25		83:2, 83:13, 83:15, 84:11, 84:18, 86:7, 88:15, 89:25, 90:23, 92:15, 93:4, 93:9, 93:20, 94:5, 94:10, 94:15, 95:3, 96:14, 96:21, 101:6, 101:9, 101:19, 101:22, 102:5, 102:17, 102:18, 114:24, 120:23, 121:8, 121:22, 125:10, 125:14, 127:4, 128:25, 129:15, 129:19, 129:20, 130:17, 131:1, 131:9, 133:8, 133:23
leaning [1] - 71:14	look [26] - 13:18, 14:25, 19:14, 22:25, 25:2, 26:9, 26:22, 47:2, 50:8, 54:25, 55:25, 59:21, 61:8, 63:6, 63:16, 85:24, 89:15, 91:14, 92:4, 92:7, 92:9, 105:13, 105:17, 126:4, 126:8, 131:2	marathon [1] - 7:2		83:2, 83:13, 83:15, 84:11, 84:18, 86:7, 88:15, 89:25, 90:23, 92:15, 93:4, 93:9, 93:20, 94:5, 94:10, 94:15, 95:3, 96:14, 96:21, 101:6, 101:9, 101:19, 101:22, 102:5, 102:17, 102:18, 114:24, 120:23, 121:8, 121:22, 125:10, 125:14, 127:4, 128:25, 129:15, 129:19, 129:20, 130:17, 131:1, 131:9, 133:8, 133:23
learned [2] - 81:10, 90:15	looked [3] - 25:18, 26:24, 91:16	March [11] - 24:6, 24:7, 35:10, 41:9, 41:18, 51:6, 52:25, 85:10, 106:23, 134:18		83:2, 83:13, 83:15, 84:11, 84:18, 86:7, 88:15, 89:25, 90:23, 92:15, 93:4, 93:9, 93:20, 94:5, 94:10, 94:15, 95:3, 96:14, 96:21, 101:6, 101:9, 101:19, 101:22, 102:5, 102:17, 102:18, 114:24, 120:23, 121:8, 121:22, 125:10, 125:14, 127:4, 128:25, 129:15, 129:19, 129:20, 130:17, 131:1, 131:9, 133:8, 133:23
learning [3] - 113:3, 127:4, 127:5	looking [5] - 44:16, 60:13, 64:8, 109:24, 113:21	mark [4] - 59:11, 61:6, 91:2, 116:11		83:2, 83:13, 83:15, 84:11, 84:18, 86:7, 88:15, 89:25, 90:23, 92:15, 93:4, 93:9, 93:20, 94:5, 94:10, 94:15, 95:3, 96:14, 96:21, 101:6, 101:9, 101:19, 101:22, 102:5, 102:17, 102:18, 114:24, 120:23, 121:8, 121:22, 125:10, 125:14, 127:4, 128:25, 129:15, 129:19, 129:20, 130:17, 131:1, 131:9, 133:8, 133:23
least [2] - 51:24, 98:19	looks [8] - 26:15, 26:21, 26:23, 26:25, 27:3, 27:10, 101:24, 103:9	marked [27] - 25:22, 26:1, 26:5, 59:12, 59:15, 59:18, 61:12, 89:7, 89:10, 91:3, 91:6, 91:8, 91:23, 92:1, 101:13, 101:17, 105:8, 105:11, 107:17, 107:20, 113:4, 113:7, 113:8, 119:10, 119:13, 120:11		83:2, 83:13, 83:15, 84:11, 84:18, 86:7, 88:15, 89:25, 90:23, 92:15, 93:4, 93:9, 93:20, 94:5, 94:10, 94:15, 95:3, 96:14, 96:21, 101:6, 101:9, 101:19, 101:22, 102:

memory ^[1] - 70:13 Mennonite ^[1] - 66:10 mental ^[1] - 126:6 mention ^[1] - 52:2 mentioned ^[4] - 43:10, 85:20, 98:14, 135:1 mentioning ^[1] - 99:5 mentor ^[1] - 80:12 merely ^[1] - 91:19 met ^[2] - 24:1, 134:16 metal ^[2] - 56:23, 57:1 Michelle ^[2] - 103:24, 106:13 mid ^[2] - 24:7, 41:9 Might ^[1] - 90:18 might ^[15] - 22:15, 26:21, 46:8, 46:25, 104:24, 116:7, 124:11, 125:22, 126:3, 126:8, 126:11, 126:12, 126:15, 127:2, 135:2 mind ^[2] - 129:16, 129:18 minority ^[3] - 64:9, 114:3, 130:14 minute ^[3] - 89:15, 124:11, 132:17 Minutes ^[1] - 3:18 minutes ^[12] - 20:24, 21:2, 23:22, 50:22, 56:25, 59:6, 101:18, 101:22, 102:2, 102:4, 102:25, 103:4 mishandled ^[1] - 15:18 mishandling ^[2] - 15:8, 15:16 Miss ^[1] - 101:2 missing ^[1] - 112:7 misstatements ^[1] - 100:9 mistreated ^[4] - 16:21, 16:22, 17:1, 17:11 mistreatment ^[4] - 16:19, 16:25, 17:5, 65:24 moment ^[7] - 5:22, 17:19, 26:9, 59:2, 60:6, 64:15, 84:4 Monday ^[1] - 82:8 money ^[2] - 12:11, 88:6 monsters ^[1] - 84:21 month ^[2] - 48:19, 134:18 monthly ^[1] - 62:20 months ^[2] - 18:21, 87:16 morning ^[1] - 4:16	morphed ^[2] - 28:9, 37:9 most ^[2] - 39:18, 63:20 mostly ^[1] - 134:20 mother ^[3] - 93:15, 95:14, 116:5 motivated ^[1] - 132:9 motivation ^[2] - 85:22, 135:7 motive ^[3] - 122:3, 122:12, 135:2 mouth ^[1] - 129:22 move ^[3] - 10:24, 65:18, 126:15 moves ^[1] - 29:12 Moyer ^[1] - 129:24 MR ^[59] - 4:15, 4:23, 4:25, 5:3, 9:14, 9:18, 10:4, 10:10, 10:18, 25:24, 38:11, 38:13, 59:5, 59:9, 59:14, 76:14, 76:17, 76:18, 89:9, 90:1, 90:4, 90:7, 91:1, 91:5, 91:25, 101:15, 105:10, 107:19, 113:6, 115:24, 116:10, 116:13, 116:15, 117:7, 117:11, 118:17, 118:19, 118:22, 118:25, 119:2, 119:12, 120:10, 120:13, 124:10, 124:13, 124:14, 124:15, 124:16, 124:18, 124:19, 124:21, 132:12, 132:13, 132:18, 132:19, 132:24, 135:10, 135:12, 135:13 multiple ^[4] - 111:9, 111:10, 112:25, 134:17 municipal ^[3] - 11:7, 11:19, 12:7 Municipal ^[1] - 11:21 must ^[2] - 65:7, 105:22 mutual ^[2] - 43:10, 43:13	75:14 natatorium ^[1] - 127:24 nature ^[1] - 81:2 necessarily ^[5] - 7:2, 62:9, 100:19, 106:14, 117:14 need ^[13] - 6:5, 6:19, 6:24, 6:25, 13:12, 22:20, 59:1, 59:2, 61:12, 63:11, 89:25, 104:12, 110:3 needed ^[12] - 22:17, 46:20, 48:2, 72:24, 72:25, 79:9, 88:23, 99:23, 100:6, 100:18, 100:20, 110:13 needs ^[2] - 39:16, 133:7 negative ^[3] - 18:5, 69:23, 72:22 negatively ^[1] - 34:2 Nestor ^[2] - 103:24, 106:13 neutral ^[2] - 86:10, 86:13 Never ^[2] - 41:17, 127:12 never ^[23] - 22:9, 36:13, 39:12, 41:16, 43:4, 47:9, 47:12, 47:15, 48:5, 49:16, 53:21, 68:17, 81:9, 82:21, 83:1, 86:6, 90:20, 109:14, 113:13, 113:18, 114:24, 133:14, 133:15 new ^[20] - 14:16, 44:11, 44:16, 53:10, 63:9, 63:14, 63:21, 63:23, 85:23, 86:17, 99:22, 104:6, 109:24, 110:2, 112:21, 113:2, 115:21, 116:21, 117:18, 119:14 New ^[3] - 3:25, 107:8, 114:6 newly ^[1] - 63:4 newly-elected ^[1] - 63:4 next ^[7] - 48:6, 75:20, 82:24, 83:3, 98:20, 99:19, 114:13 nice ^[1] - 80:12 night ^[8] - 70:21, 83:12, 87:4, 88:16, 92:23, 95:7, 129:9,	130:2 nine ^[13] - 63:24, 63:25, 64:2, 72:19, 72:24, 73:1, 86:1, 86:2, 86:3, 86:5, 89:1, 89:3, 112:8 Nittany ^[1] - 7:7 Nobody ^[4] - 71:20, 72:5, 108:16 None ^[1] - 51:18 nonetheless ^[1] - 18:7 normal ^[1] - 49:21 North ^[1] - 2:9 Nos ^[2] - 59:16, 60:13 nose ^[1] - 85:13 Notary ^[3] - 1:21, 136:6, 136:21 note ^[3] - 84:2, 93:14, 108:4 notebook ^[1] - 61:14 notes ^[7] - 24:4, 27:18, 27:23, 46:25, 57:21, 105:15, 107:23 Notes ^[1] - 3:20 nothing ^[4] - 10:12, 78:18, 79:13, 87:21 Nothing ^[2] - 72:11, 132:12 notice ^[2] - 20:11, 134:11 notified ^[1] - 19:8 notify ^[1] - 82:10 noting ^[1] - 75:23 notion ^[1] - 13:9 November ^[4] - 11:2, 117:17, 119:18, 121:15 nuances ^[1] - 97:12 number ^[18] - 14:1, 14:3, 27:10, 41:25, 56:21, 56:24, 57:4, 57:5, 60:2, 60:10, 60:19, 60:25, 61:2, 61:4, 61:14, 61:15, 61:17, 61:22 numbers ^[4] - 60:7, 60:11, 61:7	obstacles ^[1] - 113:3 Obviously ^[2] - 5:20, 5:25 obviously ^[2] - 27:17, 96:2 occur ^[4] - 74:18, 77:3, 77:5, 79:23 occurred ^[5] - 21:2, 35:9, 67:10, 101:3, 135:6 odds ^[1] - 104:15 OF ^[2] - 1:1 offer ^[4] - 22:16, 33:21, 45:17, 111:24 office ^[4] - 45:12, 52:1, 77:6, 131:25 official ^[1] - 23:22 officially ^[1] - 94:16 often ^[2] - 23:25, 78:9 old ^[5] - 25:15, 25:16, 25:21, 27:8, 64:1 once ^[1] - 132:16 one ^[29] - 5:11, 6:7, 8:20, 13:1, 15:13, 25:25, 26:1, 27:8, 42:25, 46:23, 49:13, 50:2, 51:21, 60:4, 60:12, 61:11, 74:24, 81:10, 91:2, 91:7, 102:14, 107:23, 111:22, 112:9, 118:7, 119:20, 127:23, 131:22 One ^[1] - 131:5 ones ^[2] - 29:5, 64:14 oOo ^[1] - 1:12 open ^[2] - 129:16, 129:18 opened ^[1] - 65:10 operates ^[1] - 81:13 opinion ^[4] - 63:22, 80:19, 80:25, 100:5 opportunity ^[10] - 45:10, 47:9, 65:22, 70:23, 73:2, 102:22, 130:14, 131:15, 133:22, 134:23 opposed ^[3] - 122:3, 123:1, 124:7 options ^[6] - 69:12, 69:16, 106:21, 106:22, 111:17, 111:19 order ^[2] - 11:20, 46:21 org ^[1] - 21:5 organization ^[3] - 12:5, 12:6, 12:8 organizations ^[2] - 11:24, 68:9
N				
name ^[8] - 4:16, 4:19, 14:1, 41:16, 42:23, 43:11, 43:15, 98:13 nasty ^[3] - 71:23, 75:5,				
O				
oath ^[1] - 6:1 object ^[1] - 29:10 objected ^[1] - 19:15 objecting ^[1] - 10:16 Objection ^[2] - 38:11, 90:1 objections ^[1] - 4:7 obligations ^[1] - 47:14 observing ^[1] - 33:11				

organized [1] - 103:9 otherwise [2] - 16:10, 45:2 Otherwise [1] - 6:11 outside [5] - 14:10, 18:16, 18:21, 34:23, 125:14 overlapped [1] - 25:3 overlooked [1] - 56:7 owe [2] - 123:25, 124:2 own [16] - 8:16, 12:3, 16:2, 53:2, 53:6, 53:7, 58:6, 63:2, 70:13, 85:8, 96:25, 97:3, 121:6, 121:25, 122:7, 125:11 owned [1] - 5:9 owner [3] - 8:20, 8:22, 9:22	part [22] - 4:23, 13:18, 27:6, 32:25, 33:5, 37:14, 60:3, 60:8, 61:5, 69:6, 69:7, 85:1, 97:6, 97:8, 98:13, 98:14, 111:8, 115:8, 115:13, 115:16, 128:11, 128:12 Part [1] - 115:18 participate [1] - 33:12 participated [2] - 33:25, 121:21 participating [3] - 33:15, 33:16, 80:6 particular [2] - 28:13, 44:21 particularly [1] - 10:6 parties [3] - 4:3, 15:14, 136:14 pass [1] - 93:16 passes [1] - 29:15 passion [1] - 40:10 passive [2] - 17:13, 21:11 passively [1] - 109:20 past [3] - 10:7, 52:13, 66:13 Pause [1] - 59:4 pause [1] - 103:12 pay [1] - 56:20 paying [1] - 77:18 PC [1] - 2:8 penalties [1] - 6:1 Penn [4] - 7:11, 7:15, 8:3, 8:4 PENNSYLVANIA [1] - 1:1 Pennsylvania [5] - 1:19, 7:9, 24:22, 136:3, 136:7 people [19] - 12:14, 15:1, 15:2, 15:16, 30:7, 32:7, 32:17, 34:7, 34:12, 34:18, 37:11, 37:13, 81:7, 83:10, 102:23, 109:14, 118:8, 129:21, 129:22 per [1] - 128:10 percent [3] - 13:23, 14:12, 125:17 perfect [1] - 56:12 perfectly [1] - 84:10 performance [1] - 22:21 perhaps [4] - 58:19, 60:7, 64:11, 103:12 periodically [1] - 22:20	perjury [1] - 6:1 permitted [1] - 100:14 person [15] - 13:3, 13:4, 62:10, 77:1, 79:16, 87:13, 107:1, 110:11, 111:4, 111:5, 111:23, 112:1, 121:6, 129:24, 133:14 personal [10] - 12:3, 36:7, 52:22, 53:8, 64:13, 73:23, 75:6, 84:19, 85:9, 93:14 personally [6] - 21:9, 58:21, 62:7, 73:7, 83:24, 113:15 persons [1] - 34:24 perspective [3] - 22:19, 40:11, 71:3 phone [23] - 37:4, 41:7, 41:8, 41:21, 41:25, 51:5, 60:2, 60:9, 60:15, 60:19, 61:2, 61:4, 61:14, 61:15, 61:17, 61:22, 77:19, 79:8, 79:12, 123:14, 126:5, 126:11, 134:21 Phone [2] - 3:10, 3:12 photocopy [1] - 118:15 physical [1] - 35:6 physically [2] - 75:24, 76:24 pick [4] - 79:10, 108:6, 112:13, 112:14 picks [1] - 112:15 piece [1] - 132:10 piecemeal [1] - 132:16 Pittsburgh [2] - 52:1, 52:3 place [5] - 66:21, 82:5, 82:7, 96:16, 133:8 PLACE [1] - 1:18 placed [6] - 5:25, 6:17, 81:15, 82:9, 82:14, 96:11 plaintiff [1] - 14:4 Plaintiff [4] - 131:21, 132:4, 135:3, 135:8 Plaintiffs [9] - 1:6, 1:15, 2:6, 4:11, 4:18, 116:22, 117:23, 122:2, 122:11 planned [2] - 20:11, 20:19 Planning [1] - 3:20 planning [1] - 105:15 played [1] - 49:19 pleading [1] - 118:6	pleadings [1] - 4:24 PLEAS [1] - 1:1 pleasure [1] - 110:23 plenty [1] - 71:16 pock [1] - 30:7 point [21] - 22:24, 25:16, 31:20, 35:3, 40:22, 41:4, 41:15, 52:14, 62:3, 62:18, 67:23, 84:17, 85:19, 85:21, 86:22, 108:11, 109:22, 114:21, 121:16, 121:17, 121:20 policy [12] - 18:22, 18:23, 68:4, 87:18, 103:21, 112:17, 112:21, 126:5, 126:8, 126:11, 129:1, 129:13 Policy [1] - 3:22 political [10] - 68:9, 68:12, 117:2, 118:2, 119:25, 120:5, 120:17, 131:18, 131:22, 135:2 politically [1] - 132:8 poll [3] - 99:9, 99:12, 99:13 polls [1] - 81:9 position [4] - 55:23, 69:1, 72:12, 113:1 possibilities [1] - 86:19 possibility [1] - 107:13 possible [9] - 82:20, 88:5, 88:6, 107:15, 107:16, 115:4, 130:18, 130:20, 130:21 possibly [4] - 78:24, 88:9, 110:17, 115:3 Possibly [1] - 80:4 posted [1] - 24:24 potential [8] - 22:21, 69:1, 71:6, 81:14, 83:2, 86:18, 88:19, 126:19 potentially [4] - 14:25, 82:23, 87:17, 114:12 PR [1] - 84:3 practice [8] - 22:12, 22:14, 22:20, 22:23, 51:25, 99:5, 99:7, 104:25 practices [3] - 69:8, 86:17, 86:20 preclude [1] - 104:3 prefer [1] - 9:25	pregnant [1] - 7:12 prepare [2] - 94:14, 102:16 prepared [4] - 27:5, 27:7, 85:5, 94:8 preparing [2] - 93:19, 121:21 presence [1] - 133:16 present [10] - 9:1, 9:21, 19:17, 31:15, 34:24, 65:17, 74:6, 77:8, 84:19, 110:10 PRESENT [1] - 2:14 presented [2] - 38:17, 39:10 president [10] - 47:25, 48:1, 73:5, 73:6, 80:10, 80:11, 93:23, 98:3, 98:8, 103:25 press [31] - 29:18, 29:23, 30:1, 31:9, 31:10, 53:13, 54:18, 69:21, 70:9, 70:19, 70:20, 72:23, 84:3, 84:10, 84:23, 85:3, 85:4, 85:5, 85:18, 87:1, 87:3, 87:4, 100:2, 100:12, 109:11, 111:6 presumably [2] - 111:9, 129:7 Presumably [1] - 111:11 presume [2] - 6:12, 123:3 pretty [1] - 25:6 prevent [1] - 110:25 prevented [2] - 110:15, 131:12 previous [1] - 25:14 pricing [2] - 69:14, 69:16 primarily [1] - 62:11 primary [1] - 135:7 print [2] - 109:11, 119:4 printed [1] - 116:10 printout [2] - 119:6, 136:12 priorities [1] - 86:24 priority [3] - 63:13, 63:25, 86:21 private [14] - 10:11, 10:17, 11:23, 12:8, 12:16, 15:10, 64:22, 65:1, 65:13, 67:2, 67:4, 67:9, 76:10, 101:1 problem [2] - 47:16, 109:9
P				
p.m [3] - 132:21, 132:22, 135:16 PA [4] - 1:23, 2:4, 2:9, 68:18 PAC [1] - 68:18 pace [1] - 28:4 Page [4] - 3:25, 60:5, 119:14, 125:23 page [11] - 26:14, 26:16, 27:2, 27:18, 92:11, 92:19, 105:24, 113:22, 118:18, 119:20, 126:2 PAGE [2] - 3:2, 3:7 Pages [1] - 26:7 pages [1] - 26:12 paid [1] - 104:10 painted [2] - 18:4, 109:12 painting [1] - 69:22 PALLAS [1] - 2:8 paperwork [5] - 53:21, 116:2, 116:8, 125:21, 127:5 Paragraph [2] - 116:21, 119:19 paragraph [1] - 118:6 parameters [1] - 109:24 pardon [1] - 90:3 parent [5] - 18:18, 18:20, 19:2, 31:16 parents [2] - 82:10, 82:11 parking [2] - 58:24, 59:3				

problems [2] - 58:6, 88:1 procedure [1] - 7:4 procedures [2] - 7:19, 7:21 proceed [1] - 27:12 proceeded [1] - 65:21 process [34] - 7:24, 27:11, 28:4, 34:1, 34:2, 34:15, 35:3, 35:16, 35:20, 36:15, 44:13, 46:3, 46:5, 47:21, 49:21, 50:11, 54:9, 69:7, 71:4, 72:4, 87:24, 88:25, 103:7, 103:12, 105:6, 106:3, 108:23, 109:13, 109:22, 111:8, 123:18, 127:6, 128:13 proctor [1] - 7:24 production [1] - 26:8 professional [4] - 84:6, 130:6, 130:7, 130:9 professionalism [1] - 31:4 program [1] - 18:18 progress [3] - 33:18, 44:10, 86:23 progressed [1] - 129:20 prohibited [1] - 126:24 prompted [1] - 13:12 proposal [1] - 13:9 Proposals [1] - 3:9 proposed [3] - 27:2, 28:5, 114:6 Proposed [1] - 3:8 propriety [1] - 47:21 prospect [1] - 87:11 prospective [1] - 38:9 protect [1] - 66:5 protecting [1] - 72:13 protection [1] - 19:24 Prothonotary [1] - 119:18 proven [1] - 72:14 provide [1] - 123:15 provided [8] - 25:10, 59:23, 60:15, 61:19, 91:8, 91:10, 113:16 prudent [2] - 106:4, 106:16 PSBA [2] - 12:22, 13:4 public [11] - 10:15, 18:2, 21:2, 38:8, 83:2, 102:22,	114:24, 128:25, 130:1, 133:8 Public [3] - 1:21, 136:6, 136:21 puffed [1] - 57:8 purpose [3] - 55:19, 55:25, 56:4 purposes [4] - 26:7, 55:21, 59:19, 89:12 put [5] - 22:13, 44:18, 61:13, 106:14, 111:14 puts [1] - 128:9 putting [6] - 17:18, 25:9, 43:11, 88:9, 96:20, 108:12	133:22 reached [1] - 134:1 reaching [1] - 131:12 read [9] - 91:12, 92:17, 93:6, 102:12, 117:9, 118:13, 119:4, 119:21, 119:23 reading [2] - 4:5, 103:11 real [3] - 22:2, 30:8, 74:14 realize [1] - 67:11 realized [1] - 84:4 really [20] - 25:6, 25:7, 37:17, 42:24, 43:5, 46:7, 50:2, 50:18, 52:6, 60:9, 67:25, 68:13, 78:2, 82:16, 84:1, 97:9, 100:8, 123:5, 123:22, 126:4 Ream [1] - 1:18 REAM [1] - 2:3 reason [7] - 14:13, 16:10, 61:23, 71:3, 91:18, 93:17, 94:19 reasons [1] - 120:20 rebid [2] - 22:6, 22:9 receive [1] - 39:19 received [4] - 46:23, 49:13, 95:12, 102:9 receiving [3] - 49:25, 93:8, 93:10 recently [3] - 90:18, 121:9, 121:12 recess [2] - 59:7, 132:21 recognize [7] - 26:10, 26:13, 89:16, 89:20, 92:5, 105:14, 105:18 recognized [1] - 47:23 recollect [3] - 48:15, 80:16, 97:7 recollection [7] - 6:4, 18:13, 46:11, 49:1, 105:21, 116:13, 118:10 recommend [2] - 108:24, 112:1 recommendation [4] - 29:14, 109:1, 109:6, 110:8 recommendations [1] - 111:18 recommended [1] - 111:22 recommends [3] - 108:20, 128:11, 128:14 record [8] - 4:20,	11:18, 59:6, 59:11, 76:16, 119:9, 132:19, 136:12 recorded [1] - 136:11 recording [4] - 6:20, 11:11, 11:12, 11:16 records [4] - 41:8, 41:21, 59:23, 123:14 Records [2] - 3:10, 3:12 recount [1] - 58:4 redacted [1] - 60:8 reduced [1] - 136:11 redundant [1] - 25:3 refer [1] - 23:5 referenced [1] - 120:1 references [1] - 105:15 referring [6] - 9:9, 70:9, 108:7, 108:9, 119:19, 123:13 reform [1] - 35:17 regard [4] - 36:14, 51:16, 98:25, 127:5 regarding [8] - 17:20, 18:16, 54:25, 103:17, 127:6, 129:1, 129:17, 131:18 regardless [2] - 117:3, 118:4 regards [1] - 131:17 regional [1] - 16:7 regrets [1] - 18:6 reiterate [1] - 129:14 related [1] - 12:17 relates [1] - 10:7 relating [1] - 79:4 relative [1] - 136:14 release [7] - 27:2, 30:1, 54:9, 84:3, 85:5, 85:18, 100:2 Release [1] - 3:8 releasing [2] - 27:15, 54:12 relevance [1] - 10:16 relevant [2] - 9:15, 10:2 remarks [5] - 17:22, 17:24, 29:18, 29:22, 54:17 remember [38] - 7:22, 14:21, 20:4, 21:23, 24:2, 46:10, 46:11, 46:12, 49:25, 50:19, 57:17, 66:18, 66:20, 77:25, 78:24, 79:1, 81:24, 82:1, 83:14, 93:8, 93:10, 94:2, 95:11, 95:16, 96:4,	96:10, 97:8, 97:9, 97:10, 99:25, 114:15, 114:17, 115:25, 116:4, 116:16, 121:12, 130:20 removed [1] - 24:14 renewing [1] - 128:1 repeat [1] - 6:8 rephrase [3] - 6:9, 12:1, 99:16 replace [1] - 87:18 replaced [2] - 100:18, 129:24 replacement [2] - 127:11, 127:14 reported [2] - 70:8, 70:16 REPORTER [1] - 1:20 Reporter [3] - 1:21, 136:6, 136:20 represent [7] - 4:18, 54:22, 55:7, 72:19, 91:9, 103:2, 107:22 representation [3] - 53:25, 55:6, 86:21 representative [1] - 31:16 represented [4] - 5:17, 55:8, 63:5, 72:24 representing [2] - 64:7, 89:3 represents [2] - 60:14, 60:20 reprint [1] - 70:10 reproduction [1] - 136:15 Republican [1] - 11:14 Request [1] - 3:8 request [4] - 13:9, 32:3, 91:11, 126:3 requested [1] - 90:13 require [2] - 103:20, 103:22 required [2] - 12:21, 129:13 requirement [1] - 104:21 requirements [2] - 15:25, 111:14 requiring [2] - 15:19, 16:5 reserved [1] - 4:8 resident [2] - 44:20, 114:6 respective [1] - 4:3 respond [3] - 22:13, 42:6, 123:20 response [4] - 47:17, 56:22, 115:22, 117:8
--	---	---	--	--

responses [3] - 6:18, 23:4, 51:4 responsible [1] - 13:21 rest [2] - 46:19, 102:19 restate [1] - 90:5 result [3] - 76:5, 97:17, 97:25 results [1] - 122:17 retain [1] - 109:8 revealing [1] - 67:19 review [4] - 101:20, 113:11, 113:16, 115:20 RFP [74] - 3:8, 3:20, 13:9, 13:13, 14:16, 16:10, 17:17, 22:2, 22:25, 24:11, 25:5, 27:3, 27:6, 27:11, 27:15, 28:4, 28:9, 31:20, 33:22, 33:25, 34:24, 35:13, 35:16, 35:20, 36:10, 36:14, 38:7, 38:20, 38:21, 39:1, 39:9, 39:12, 39:22, 44:18, 46:2, 46:5, 46:13, 46:19, 46:21, 46:23, 48:7, 50:11, 54:9, 54:10, 55:10, 69:7, 71:4, 74:1, 74:3, 74:13, 74:20, 87:24, 88:9, 88:24, 103:19, 104:5, 104:22, 105:15, 106:3, 106:14, 106:16, 107:23, 108:13, 108:15, 109:2, 109:22, 109:23, 111:8, 111:14, 127:25, 128:7, 128:16, 129:8, 129:13 RFPs [8] - 22:13, 24:23, 25:10, 25:14, 127:18, 127:21, 128:4, 129:1 ridiculous [1] - 120:24 right-to-know [2] - 12:18, 91:11 rights [1] - 85:25 rings [1] - 96:8 road [1] - 41:4 role [1] - 33:12 room [13] - 34:21, 36:20, 40:23, 64:23, 65:4, 65:6, 65:9, 74:7, 77:23, 119:8, 120:25, 128:21, 129:25	ruled [1] - 126:7 rules [2] - 5:23, 6:14 run [1] - 8:20 Ryan [2] - 17:16, 46:16 S sabotaged [3] - 53:16, 54:2, 54:8 sad [1] - 67:25 safe [1] - 23:8 Sanders [2] - 56:17, 56:20 Sanders' [1] - 56:21 sat [5] - 33:7, 65:5, 65:9, 65:11, 77:11 satisfied [2] - 58:21, 62:19 saw [4] - 37:6, 121:9, 121:13, 130:24 Sayre [3] - 1:5, 116:25, 117:25 Scan [1] - 49:4 scan [1] - 49:5 scheduled [1] - 83:6 school [43] - 10:25, 15:9, 18:17, 22:8, 24:22, 25:9, 28:18, 44:2, 44:20, 47:5, 51:16, 51:25, 52:9, 52:13, 52:17, 52:19, 57:14, 58:12, 58:17, 58:23, 62:6, 63:25, 64:12, 66:10, 66:11, 68:4, 87:12, 98:3, 98:24, 100:10, 104:10, 104:17, 108:19, 114:22, 115:15, 115:22, 117:16, 117:19, 122:19, 126:9, 126:17, 127:6, 135:4 School [16] - 1:8, 1:8, 3:8, 3:13, 3:15, 7:8, 13:15, 74:17, 103:25, 110:6, 110:20, 112:10, 117:2, 118:3, 124:23, 127:17 scopes [1] - 51:21 scrambled [1] - 116:7 scratch [1] - 24:19 sealing [1] - 4:5 second [15] - 28:15, 28:21, 35:5, 35:10, 39:24, 45:24, 58:25, 86:21, 92:19, 105:24, 113:21, 113:22, 113:24,	114:20, 132:20 secretary [4] - 11:11, 11:12, 11:17, 48:24 section [1] - 117:17 see [17] - 18:19, 18:20, 19:11, 21:19, 40:9, 40:10, 45:15, 47:9, 60:6, 85:13, 92:14, 92:25, 103:1, 105:13, 111:19, 116:9, 119:16 seeing [1] - 114:20 seek [3] - 69:4, 69:5, 71:5 sees [1] - 110:11 SEGLIAS [1] - 2:8 selected [5] - 86:17, 103:8, 107:13, 110:3, 110:24 selecting [2] - 87:10, 105:2 self [6] - 8:14, 8:15, 8:23, 9:4, 9:6, 10:20 self-employed [5] - 8:14, 8:15, 8:23, 9:4, 9:6 self-employment [1] - 10:20 send [5] - 46:14, 46:19, 47:7, 49:4, 49:5 sense [2] - 53:12, 125:21 sensitive [1] - 29:16 sent [8] - 46:14, 48:5, 49:10, 49:15, 49:16, 49:22, 55:11, 102:23 sentence [1] - 113:24 serious [1] - 93:15 seriously [1] - 72:5 serve [1] - 114:4 serves [1] - 110:23 Services [2] - 3:9, 3:20 services [5] - 13:10, 22:3, 22:4, 105:15, 114:8 serving [1] - 11:7 session [15] - 7:2, 20:22, 21:1, 50:4, 64:23, 64:24, 65:6, 67:3, 73:25, 82:22, 83:6, 83:15, 83:17, 101:4, 126:14 set [9] - 18:25, 28:5, 53:10, 54:2, 54:8, 63:6, 69:20, 80:15, 102:2 sets [1] - 27:10 settle [1] - 13:15	settled [1] - 14:9 settlement [4] - 13:16, 15:7, 15:12, 16:8 several [2] - 56:25, 100:20 shape [1] - 109:23 shared [1] - 100:4 sheet [1] - 93:3 Sherry [1] - 129:23 Shore [18] - 1:8, 3:8, 3:13, 3:15, 13:15, 25:14, 29:13, 74:16, 98:4, 110:5, 110:20, 111:15, 112:9, 112:18, 117:2, 118:3, 124:23, 127:17 Shore's [1] - 26:8 short [1] - 118:15 shots [1] - 30:8 shouted [3] - 40:1, 40:2, 40:3 shouting [4] - 40:7, 40:10, 53:23, 129:21 show [4] - 61:5, 105:11, 113:7, 116:16 showed [2] - 26:1, 30:10 showing [10] - 26:4, 26:12, 30:24, 40:18, 89:10, 91:6, 92:1, 101:16, 107:20, 119:13 shows [1] - 60:18 sick [5] - 75:24, 76:3, 76:13, 79:14, 79:15 signed [4] - 116:2, 116:3, 116:12, 116:18 significantly [1] - 88:3 signing [1] - 4:5 silly [1] - 57:6 similar [1] - 26:22 simply [1] - 72:17 single [2] - 72:4, 102:14 singular [3] - 111:4, 111:5, 125:11 sit [3] - 34:21, 35:23, 62:20 Sitting [1] - 118:11 sitting [2] - 18:12, 52:23 skipped [1] - 59:10 slam [1] - 35:25 slammed [1] - 29:3 slow [1] - 34:14 slowed [1] - 88:2 small [1] - 33:15	smart [1] - 56:5 social [1] - 126:5 sole [2] - 8:19, 8:22 Solicitor [1] - 3:23 solicitor [64] - 13:21, 14:17, 16:12, 21:24, 29:6, 30:3, 44:12, 44:16, 44:25, 51:17, 52:9, 52:13, 52:16, 58:12, 58:17, 58:23, 62:5, 63:14, 63:21, 63:23, 69:1, 72:9, 72:24, 75:10, 75:20, 81:2, 82:24, 83:3, 83:21, 85:23, 86:17, 87:11, 87:19, 88:20, 89:24, 94:16, 98:6, 98:20, 99:1, 99:19, 99:22, 103:7, 104:6, 105:3, 106:5, 106:10, 107:14, 109:25, 110:2, 110:16, 110:23, 111:1, 113:1, 113:25, 114:1, 114:6, 114:13, 127:11, 127:15, 129:12, 129:17, 130:18, 130:21, 134:13 solicitors [2] - 14:25, 88:7 someone [7] - 20:2, 34:10, 63:14, 71:7, 73:13, 125:22, 127:2 sometimes [2] - 93:24 Somewhere [1] - 41:8 somewhere [1] - 92:9 son [1] - 7:12 sorry [2] - 66:4, 66:14 Sorry [3] - 76:17, 79:20, 120:12 sort [3] - 36:9, 37:7, 70:15 sound [1] - 51:8 sounded [1] - 20:10 source [1] - 43:5 sourcing [1] - 127:1 speaking [1] - 114:22 specialize [1] - 51:24 specialty [1] - 104:13 specific [5] - 57:17, 67:21, 74:1, 99:25, 117:14 specifically [29] - 16:24, 17:21, 18:11, 21:22, 23:11, 25:18, 25:25, 28:20, 30:10, 48:21, 49:3, 54:8, 55:9, 66:18, 67:20,
--	--	---	--	---

76:8, 76:11, 79:6, 82:2, 82:12, 82:17, 83:14, 91:7, 96:4, 96:23, 114:15, 122:3, 122:11, 124:6 specifics [2] - 76:2, 97:12 specify [3] - 30:12, 30:14, 31:1 spectacle [1] - 129:21 speculate [4] - 46:7, 50:20, 94:17, 94:19 spoken [2] - 75:2, 89:4 spot [1] - 86:10 SS [1] - 136:2 stacked [1] - 109:13 staff [7] - 28:18, 29:11, 32:3, 34:8, 38:25, 104:9, 104:20 stamp [1] - 119:16 standard [1] - 101:23 stands [1] - 114:8 stared [2] - 65:12, 67:6 start [3] - 27:1, 64:22, 95:19 started [7] - 28:17, 58:9, 64:24, 64:25, 65:23, 116:5, 116:6 starting [2] - 32:7, 134:18 State [1] - 7:11 state [2] - 4:19, 103:21 statement [23] - 10:8, 18:2, 19:9, 19:10, 19:11, 19:16, 19:18, 19:21, 20:6, 20:12, 20:14, 20:16, 20:20, 21:22, 31:9, 54:24, 55:3, 63:19, 64:5, 117:5, 117:6, 118:12, 119:24 Statement [1] - 3:22 statements [6] - 18:4, 20:5, 54:6, 66:15, 67:1, 118:9 states [1] - 116:21 stay [1] - 38:4 steno [1] - 6:19 stenographer [1] - 6:17 stenotype [1] - 136:11 Stephen [3] - 1:3, 116:22, 117:23 Stevie [1] - 125:25 still [2] - 22:17, 56:24 stipulated [1] - 4:2 STIPULATION [1] - 4:1	Stock [7] - 16:12, 16:14, 17:12, 22:17, 88:12, 88:13, 88:22 Stoltz [39] - 17:16, 17:19, 18:1, 19:8, 20:5, 20:16, 20:19, 21:16, 21:21, 28:21, 30:5, 30:9, 31:5, 31:8, 32:24, 33:4, 33:25, 34:22, 40:17, 40:25, 46:16, 54:5, 54:16, 54:18, 54:22, 64:4, 65:4, 67:5, 70:19, 70:22, 70:23, 72:1, 84:3, 84:9, 85:5, 92:21, 100:2, 103:18, 109:9 stop [7] - 19:22, 35:20, 35:21, 64:4, 72:22, 84:12, 128:16 stopped [1] - 67:15 stopping [2] - 36:14, 72:4 stories [1] - 87:2 story [1] - 84:24 stranger [1] - 42:21 Street [3] - 1:19, 2:4, 2:9 stress [3] - 75:24, 76:21, 76:23 strictly [2] - 96:3, 128:13 strongly [1] - 19:15 students [1] - 15:20 subject [1] - 6:1 submissions [1] - 111:9 submitted [1] - 38:8 subsequent [1] - 51:12 subsequently [1] - 136:11 suddenly [2] - 34:13, 37:13 suggest [2] - 14:16, 124:6 suggestions [2] - 33:21, 39:19 summary [1] - 27:13 Sunshine [19] - 9:15, 10:2, 10:13, 12:18, 12:23, 13:2, 17:18, 46:21, 53:19, 53:21, 53:22, 82:9, 88:17, 122:4, 123:23, 124:8, 124:25, 125:6, 133:6 super [1] - 23:3 superintendent [8] - 19:4, 28:11, 28:12,	29:17, 29:23, 53:12, 87:3, 103:20 supervision [2] - 136:12, 136:16 support [1] - 120:19 supposed [6] - 10:3, 37:12, 48:22, 65:12, 67:2, 108:14 supposedly [2] - 30:23, 31:2 suppositions [1] - 69:24 surmised [1] - 45:1 suspect [1] - 99:13 suspend [1] - 128:25 suspending [1] - 36:14 swear [1] - 115:12 sworn [1] - 4:12 sworn/affirmed [1] - 136:8	testimony [1] - 4:11 Thad [5] - 114:14, 114:21, 115:8, 115:10, 131:15 Thaddeus [2] - 107:4, 113:10 THE [12] - 1:1, 5:1, 9:17, 9:25, 90:3, 90:5, 116:1, 117:9, 118:21, 118:24, 119:1, 120:12 themselves [2] - 53:22, 122:18 therefore [1] - 120:24 thinking [1] - 120:9 thinks [1] - 127:2 third [1] - 27:18 Third [2] - 2:9, 24:23 Thomas [53] - 1:9, 14:18, 16:13, 16:20, 17:2, 17:5, 17:8, 19:2, 19:6, 20:1, 29:24, 30:21, 31:7, 47:7, 49:14, 52:24, 54:6, 64:20, 65:6, 65:13, 65:15, 65:24, 66:3, 66:5, 66:6, 66:13, 66:16, 66:17, 66:18, 67:13, 67:16, 79:19, 79:20, 81:7, 81:9, 81:19, 92:12, 92:20, 94:7, 94:13, 94:22, 96:25, 97:2, 97:14, 97:22, 98:2, 98:18, 98:22, 99:12, 99:17, 99:21, 119:8, 121:2 thoughts [1] - 122:16 threat [4] - 73:23, 73:24, 74:2, 74:15 three [10] - 7:15, 8:8, 22:3, 22:5, 26:12, 77:7, 82:6, 93:3, 112:13, 134:10 threshold [1] - 134:15 throw [1] - 43:2 throwing [1] - 95:19 Thursday [2] - 49:15, 82:7 Tierney [14] - 23:19, 25:12, 28:10, 32:7, 33:3, 34:5, 46:22, 47:7, 49:12, 73:17, 73:22, 73:23, 88:16, 112:7 TIME [1] - 1:17 Timeline [1] - 3:8 timeline [3] - 27:2, 28:6, 34:16 timely [2] - 55:11,	55:24 TO [2] - 3:1, 3:6 today [4] - 5:17, 18:12, 48:15, 118:11 Todd [1] - 92:21 together [9] - 12:16, 35:13, 38:20, 43:12, 88:9, 120:22, 125:8, 125:12, 128:9 tone [3] - 40:20, 40:21, 56:16 took [7] - 18:25, 60:21, 65:22, 72:5, 77:25, 93:15, 95:14 top [10] - 21:18, 24:5, 36:6, 43:7, 54:21, 58:5, 60:10, 60:11, 63:25, 119:16 topic [2] - 29:16, 68:22 topics [1] - 65:20 toward [2] - 28:14, 40:14 training [7] - 12:20, 12:22, 13:2, 13:4, 124:25, 125:2, 125:19 trainings [1] - 12:17 Trans [1] - 7:20 transcript [1] - 6:18 transcription [3] - 7:18, 7:19, 8:16 transcriptionists [1] - 7:25 transcripts [1] - 10:15 transferring [1] - 90:13 transition [1] - 97:16 transparency [1] - 84:8 transparent [2] - 106:3, 106:16 treat [2] - 71:17, 71:18 treated [3] - 17:6, 66:8, 128:23 treating [1] - 71:20 treatment [3] - 66:3, 66:12, 71:22 trial [1] - 4:8 tried [1] - 74:3 Trone [3] - 73:20, 75:2, 75:5 true [4] - 18:6, 19:16, 118:9, 136:12 truth [2] - 6:3, 136:8 try [2] - 6:9, 100:21 trying [3] - 13:24, 58:6, 120:8 Tucker [6] - 42:12, 62:12, 69:18, 88:4,
--	---	--	---	--

T

table [5] - 29:3, 36:1,
65:12, 71:14, 130:12

TAKEN [1] - 1:15

Tara [6] - 1:4, 2:15,
116:24, 117:24,
131:20, 135:1

target [2] - 27:11,
27:14

taught [2] - 7:15, 7:18

taxpayers [1] - 15:2

taxpayers' [1] - 88:6

teach [2] - 7:17, 18:17

teaching [1] - 7:14

team [8] - 109:4,
109:5, 115:8,
115:13, 115:16,
115:17, 115:18

technically [1] - 71:1

telephone [2] - 59:23,
78:5

telework [1] - 52:6

template [4] - 24:11,
24:14, 24:16, 24:17

temporary [1] - 87:20

tend [1] - 102:17

tenure [1] - 16:20

term [2] - 11:3, 87:11

termination [3] - 5:7,
9:8, 9:13

terrible [3] - 42:7,
44:8, 44:14

terribly [4] - 17:6,
17:7, 66:9, 75:5

testified [3] - 4:12,
124:24, 128:15

testify [1] - 136:8

90:14, 93:2 Tuesday [3] - 1:16, 49:15, 82:8 turn [4] - 60:16, 84:10, 93:15, 95:15 turned [1] - 107:22 turning [2] - 85:19, 85:21 turns [3] - 42:23, 43:6, 103:18 twice [1] - 24:1 two [19] - 7:15, 7:21, 8:8, 13:3, 16:20, 17:20, 18:4, 18:15, 18:21, 28:3, 31:17, 56:12, 56:15, 65:25, 74:7, 77:17, 93:2, 99:15, 132:17 Two [2] - 82:6 two-minute [1] - 132:17 types [2] - 7:21, 82:18 typically [4] - 29:12, 82:4, 93:22, 108:21	85:7 untruthful [1] - 54:15 untruths [2] - 69:24, 70:8 up [38] - 14:14, 14:22, 15:1, 15:4, 18:25, 21:10, 29:3, 37:3, 40:20, 42:8, 43:7, 45:7, 45:18, 47:2, 50:8, 50:16, 53:10, 54:2, 54:8, 58:24, 63:6, 65:2, 65:10, 68:22, 69:20, 79:10, 80:15, 83:14, 83:19, 85:8, 95:4, 96:7, 111:4, 120:10, 132:14, 132:25, 135:11 upcoming [2] - 92:15, 127:4 upped [1] - 22:10 upstanding [1] - 114:7 urgent [1] - 70:5 urgently [1] - 99:24 usurped [1] - 29:20	116:25, 118:1 vocal [1] - 35:7 voice [1] - 71:24 volume [2] - 104:18, 104:19 voluntarily [1] - 16:3 vote [43] - 36:13, 36:16, 39:1, 62:18, 62:19, 73:3, 81:5, 81:8, 81:11, 81:15, 83:23, 83:25, 85:16, 85:18, 87:19, 88:16, 90:16, 96:6, 96:16, 97:17, 97:25, 98:19, 98:25, 99:7, 106:25, 108:21, 109:19, 111:5, 111:18, 112:2, 125:11, 125:14, 127:2, 127:10, 127:14, 128:10, 128:16, 128:18, 128:24, 129:5, 129:6, 129:17, 130:22 voted [6] - 86:14, 95:7, 117:4, 118:5, 129:8, 133:21 votes [3] - 104:7, 110:7, 128:7 voting [3] - 110:25, 125:11, 127:20 VS [1] - 1:7 vulnerability [1] - 47:23	117:2, 118:3, 124:23, 127:17 whole [3] - 38:7, 77:23, 87:7 willful [1] - 85:1 window [1] - 116:4 withheld [2] - 48:8, 48:11 withhold [1] - 48:8 withholding [1] - 48:7 witness [1] - 67:18 witnessed [1] - 66:7 witnesses [2] - 74:6, 74:8 Woloshin [1] - 1:18 WOLOSHIN [1] - 2:3 woman [2] - 12:15, 66:4 wonder [2] - 42:17, 42:18 word [7] - 17:7, 17:8, 53:19, 53:23, 74:14, 100:9, 120:8 words [6] - 19:11, 54:2, 100:5, 100:24, 117:13, 117:15 works [8] - 30:5, 54:23, 57:14, 108:19, 110:6, 111:15, 112:9, 112:11 workshop [1] - 13:2 world [5] - 22:12, 58:7, 105:4, 105:7, 106:19 worried [1] - 130:4 worse [2] - 72:11, 93:15 worth [2] - 75:23, 99:5 write [4] - 61:10, 106:7, 106:8, 120:14 writes [1] - 84:23 writing [2] - 51:1, 69:22 written [4] - 6:18, 101:7, 102:24, 103:3 wrongful [3] - 5:7, 9:8, 9:13 wrongfully [1] - 100:12 wrote [2] - 65:8, 120:12 WSSD [9] - 59:19, 89:12, 92:2, 101:17, 105:12, 105:25, 107:21, 113:8, 113:22 WSSD_000001 [1] - 3:17 WSSD_000004 [1] -	3:17 WSSD_000010 [1] - 3:14 WSSD_000011 [1] - 3:14 WSSD_000177 [1] - 3:24 WSSD_000179 [1] - 3:24 WSSD_000199 [1] - 3:21 WSSD_000201 [1] - 3:21 WSSD_000331 [1] - 3:19 WSSD_000347 [1] - 3:19 WSSD_000372 [1] - 3:9 WSSD_000374 [1] - 3:9 WSSD_000382 [1] - 3:22 WSSD_000700 [1] - 3:11 WSSD_000702 [1] - 3:11 WSSD_000729 [1] - 3:12 WSSD_000738 [1] - 3:12
U	V	W	X	Y
ugly [3] - 72:2, 84:10, 84:24 Ultimately [1] - 110:2 ultimately [4] - 38:6, 58:10, 93:16, 111:12 Umm [1] - 17:16 unbecoming [1] - 70:17 unchecked [1] - 100:11 uncomfortable [2] - 65:17, 65:19 under [8] - 5:25, 21:5, 30:5, 54:23, 125:5, 133:6, 136:12, 136:16 Under [1] - 102:22 underlying [2] - 120:5, 120:8 undermine [1] - 130:8 undermining [1] - 57:19 understood [6] - 6:12, 38:21, 48:2, 62:10, 66:6, 124:5 unless [1] - 136:15 unplanned [1] - 45:23 unprofessional [2] - 19:12, 71:24 unreasonable [1] - 39:21 untrue [5] - 18:3, 54:17, 70:16, 70:18,	vague [1] - 42:24 vaguely [4] - 26:21, 26:23, 26:25, 42:24 Valley [3] - 16:5, 103:25, 104:9 value [1] - 88:5 various [1] - 52:15 verbal [1] - 6:19 verbally [1] - 48:7 verification [2] - 116:12, 116:17 verified [2] - 116:14, 118:8 Verizon [1] - 59:22 version [2] - 39:1, 39:9 versus [2] - 126:25, 133:3 vice [4] - 48:1, 73:4, 80:11, 103:24 viciously [1] - 48:6 view [1] - 86:13 viewed [2] - 86:10, 86:12 violate [1] - 123:23 violated [2] - 37:10, 53:21 violation [3] - 9:16, 10:3, 10:14 virtual [2] - 13:5, 13:6 visitation [1] - 79:9 Vivier [3] - 1:5,	waived [1] - 4:6 walked [1] - 37:2 walking [1] - 74:7 wants [1] - 113:25 warranted [1] - 21:23 waste [2] - 123:1, 123:16 wastes [1] - 122:24 wasting [1] - 123:4 watch [3] - 44:22, 53:17, 71:15 watching [2] - 44:19, 52:18 ways [2] - 25:2, 78:15 website [2] - 24:24, 82:10 weeks [1] - 87:16 West [19] - 1:8, 3:8, 3:13, 3:15, 13:15, 25:14, 26:8, 29:13, 74:16, 98:4, 110:5, 110:20, 111:15, 112:9, 112:18,	world [5] - 22:12, 58:7, 105:4, 105:7, 106:19 worried [1] - 130:4 worse [2] - 72:11, 93:15 worth [2] - 75:23, 99:5 write [4] - 61:10, 106:7, 106:8, 120:14 writes [1] - 84:23 writing [2] - 51:1, 69:22 written [4] - 6:18, 101:7, 102:24, 103:3 wrongful [3] - 5:7, 9:8, 9:13 wrongfully [1] - 100:12 wrote [2] - 65:8, 120:12 WSSD [9] - 59:19, 89:12, 92:2, 101:17, 105:12, 105:25, 107:21, 113:8, 113:22 WSSD_000001 [1] - 3:17 WSSD_000004 [1] -	XYZ [2] - 108:20, 125:23
			Z	
			zone [1] - 78:9 Zoom [1] - 125:13	