

RICK O'QUINN
March 24, 2022

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

INTERNATIONAL UNIONS, SECURITY POLICE AND FIRE
PROFESSIONALS OF AMERICA (SPFPA), AN
INTERNATIONAL UNION, AND DAVID L. HICKEY, THE
INTERNATIONAL PRESIDENT OF THE SECURITY POLICE
AND FIRE PROFESSIONALS OF AMERICA,

Plaintiffs,

vs.

Case No. 2:19-cv-10743-AC-MKM

Hon. Stephanie Dawkins Davis

STEVE MARITAS, AN INDIVIDUAL, CALVIN WELLS,
AN INDIVIDUAL, AND LAW ENFORCEMENT OFFICERS
SECURITY UNION, AN UNINCORPORATED UNION,

Defendants.

_____ /

LAW ENFORCEMENT OFFICERS SECURITY UNION,
AN UNINCORPORATED UNION, AND STEVE MARITAS,
AN INDIVIDUAL,

Plaintiffs,

-AGAINST-

Case No: 4:20-CV-12544-SDD-RSW

Hon. Stephanie Dawkins Davis

Mag. R. Steven Whalen

RICK O'QUINN
March 24, 2022

<p style="text-align: right;">Page 2</p> <p>1 INTERNATIONAL UNIONS, SECURITY POLICE 2 AND FIRE PROFESSIONALS OF AMERICA 3 (SPPFA), AN INTERNATIONAL UNION, AND 4 DAVID L. HICKEY, THE INTERNATIONAL 5 PRESIDENT OF THE SECURITY POLICE 6 AND FIRE PROFESSIONALS OF AMERICA, AND 7 DWAYNE PHILLIPS, AN INDIVIDUAL, 8 Defendants. 9 _____/ 10 11 INTERNATIONAL UNIONS, SECURITY POLICE 12 AND FIRE PROFESSIONALS OF AMERICA 13 (SPPFA), AN INTERNATIONAL UNION, AND 14 DAVID L. HICKEY, THE INTERNATIONAL 15 PRESIDENT OF THE SECURITY POLICE 16 AND FIRE PROFESSIONALS OF AMERICA, AND 17 DWAYNE PHILLIPS, AN INDIVIDUAL, 18 Third Party Plaintiff, 19 -AGAINST- Case No: 4:20-CV-12544-SDD-RSW 20 Hon. Stephanie Dawkins Davis 21 Mag. R. Steven Whalen 22 LAW ENFORCEMENT OFFICERS SECURITY UNION, 23 AN UNINCORPORATED UNION, UNITED FEDERATION 24 LEOS-PBA, AN UNINCORPORATED UNION, AND 25 STEVE MARITAS, AN INDIVIDUAL,</p>	<p style="text-align: right;">Page 4</p> <p>1 APPEARANCES: 2 3 FOR STEVE MARITAS, CALVIN WELLS, AND LAW ENFORCEMENT 4 OFFICERS SECURITY UNION: 5 THOMAS M. NUNLEY 6 Nunley Wheelock, P.C. 7 4051 Haggerty Road 8 West Bloomfield, Michigan 48323 9 248.366.5000 10 TMNunley@NunleyWheelock.com 11 12 FOR INTERNATIONAL UNIONS, SECURITY POLICE AND FIRE 13 PROFESSIONALS OF AMERICA (SPPFA), DAVID L. HICKEY, AND 14 DWAYNE PHILLIPS: 15 JOSHUA D. APEL 16 Young & Associates, P.C. 17 27725 Stansbury Boulevard 18 Suite 125 19 Farmington Hills, Michigan 48334 20 248.353.8620 21 apel@youngpc.com 22 23 SCOTT A. BROOKS 24 Gregory, Moore, Brooks & Clark, PC 25 28 West Adams Avenue Suite 300 Detroit, Michigan 48226 313.964.5600 scott@unionlaw.net 19 ALSO PRESENT: 20 David Hickey Steve Maritas 21 22 23 24 25</p>
<p style="text-align: right;">Page 3</p> <p>1 Third Party Defendants. 2 _____/ 3 4 The Deposition of RICK O'QUINN, 5 Taken at 27725 Stansbury Boulevard, Suite 125, 6 Farmington Hills, Michigan, 7 Commencing at 12:01 p.m., 8 Thursday, March 24, 2022, 9 Before Cheri L. Poplin, CSR-5132, RPR, CRR. 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25</p>	<p style="text-align: right;">Page 5</p> <p>1 TABLE OF CONTENTS 2 3 WITNESS PAGE 4 RICK O'QUINN 5 6 EXAMINATION BY MR. NUNLEY 6 7 8 EXHIBITS 9 10 EXHIBIT PAGE 11 (Exhibits attached to transcript.) 12 EXHIBIT A 12 13 EXHIBIT B 19 14 EXHIBIT C 25 15 EXHIBIT D 32 16 17 18 19 20 21 22 23 24 25</p>

RICK O'QUINN
March 24, 2022

<p style="text-align: right;">Page 6</p> <p>1 Farmington Hills, Michigan 2 Thursday, March 24, 2022 3 12:01 p.m. 4 5 RICK O'QUINN, 6 was thereupon called as a witness herein, and after 7 having first been duly sworn to testify to the truth, 8 the whole truth and nothing but the truth, was 9 examined and testified as follows: 10 EXAMINATION 11 BY MR. NUNLEY: 12 Q. Mr. O'Quinn, my name is Tom Nunley. I am the attorney 13 for Steve Maritas, Calvin Wells, LEOSU, and the United 14 Federation LEOS-PBA, and we're here for purposes of a 15 discovery deposition. Are you aware of a federal 16 lawsuit between those parties and SPFFPA, including 17 Mr. Hickey and Mr. Phillips? 18 A. I am aware. 19 Q. Okay. And I'm going to be asking you some questions, 20 and we're going to just go over some preliminary 21 ground rules so that we're both on the same page. 22 When I ask you a question, it's either going to be -- 23 I'm going to need you to either say yes, no, or if 24 it's a particular answer that requires beyond a yes or 25 no just to give all those answers audibly with words</p>	<p style="text-align: right;">Page 8</p> <p>1 A. No. 2 Q. Okay. Were they in relationship to charges brought by 3 one side or the other? 4 A. That would have been why I was there. 5 Q. Okay. And were these while you were an employee of 6 SPFFPA? 7 A. Yes. 8 Q. Okay. And do you recall how long ago they were? 9 A. More than two years. 10 Q. Okay. Do you recall whether or not it was a charge 11 brought against SPFFPA or it was a charge that SPFFPA 12 was pursuing against somebody else? 13 A. I do not recollect. 14 Q. Okay. And you don't recall anything relative to the 15 substance of those depositions? 16 A. No. 17 Q. Okay. And prior to your deposition did you review any 18 documents? 19 A. No. 20 Q. And let's just talk briefly about your employment 21 history. You state that you work for SPFFPA right now; 22 correct? 23 A. That's correct. 24 Q. And your position is? 25 A. I'm the Vice President at Large.</p>
<p style="text-align: right;">Page 7</p> <p>1 because we're being taken down by the court reporter 2 sitting next to you. Is that understood? 3 A. Yeah. 4 Q. Okay. And if I ask you a question, I'm going to 5 assume that you understood the question and that the 6 answer you're giving is in response to my question, 7 but if you do not understand my question or any part 8 of my question, I'm going to ask that you ask me to 9 restate it or to rephrase the question so it's 10 understandable to you. Is that okay? 11 A. (Nodding.) 12 Q. Okay. So have you ever had your deposition taken in 13 the past? 14 A. I believe I've had some with the NLRB. 15 Q. Okay. And the depositions with the NLRB with the 16 court reporter and in this type of a setting where 17 someone's asking you questions; correct? 18 A. Yes. 19 Q. And were you -- in those depositions were you a 20 plaintiff, a defendant, or were you just a witness? 21 A. Witness. 22 Q. Okay. And do you remember the context of the 23 reason -- excuse me. Strike that. 24 Do you remember the reasons for those 25 depositions?</p>	<p style="text-align: right;">Page 9</p> <p>1 Q. So are you the number two person of the international 2 organization? 3 A. I'm the Vice President at Large. 4 Q. Okay. Who's above you in the organizational 5 flowchart? 6 A. The President. 7 Q. Anyone else? 8 A. No. 9 Q. Okay. So the only person you report to, then, is 10 Mr. Hickey? 11 A. That's correct. 12 Q. Okay. And what are your job duties as the Vice 13 President? 14 A. I work on any special projects assigned by the 15 President. 16 Q. Okay. And can you give me an idea of what those 17 special projects are? 18 A. Negotiating contracts. 19 Q. Okay. So we've heard testimony that the Director 20 negotiates contracts, a Regional Director, Vice 21 President negotiates contracts. Why would you be 22 brought in to negotiate a contract that the job duties 23 of the Director and/or the Vice President of say 24 Region 4, Executive Director, would be doing the same 25 thing?</p>

RICK O'QUINN
March 24, 2022

<p style="text-align: right;">Page 10</p> <p>1 A. I am in a transition of handing off Region 2. I was 2 previously the Region 2 Vice President, and I'm in the 3 transition of handing off Region 2 to Region 2 and in 4 the process of training a new director for Region 2 5 and, again, working special projects for the 6 President. 7 Q. Okay. So you don't expect to have to continue to 8 negotiate contracts after you hand off Region 2 to the 9 new director? 10 A. Yeah. I would expect I would still have to negotiate 11 contracts periodically. 12 Q. Can you tell me why you would need to negotiate 13 contracts if you have two people that are directly -- 14 well, not directly, that are underneath you in terms 15 of the flowchart being a Director and a VP that would 16 still need -- you would still need to negotiate 17 contracts? 18 A. No. Other than if the President of the organization 19 needs me to go somewhere to assist, that's where I go. 20 Q. Okay. And you said that you're in the process of 21 handing off Region 2. What is Region 2? 22 A. Region 2 is one -- 23 Q. And by that -- I'm sorry. I don't mean to interrupt 24 you. But that's geographically. 25 A. Geographically?</p>	<p style="text-align: right;">Page 12</p> <p>1 A. I was an international representative for the 2 International. 3 Q. Okay. And have you ever been a dues paying member of 4 SPFFPA? 5 A. I've been a dues paying member since 1984. 6 Q. 1984. And so you worked for different securities 7 unions leading up to your transition into the 8 Executive International? 9 A. I originally worked for Pan Am. I was a security 10 police officer at Pan Am in 1984. 11 Q. Okay. I don't want to go back that far. 12 A. I've been a president. I've been a local president of 13 a local. I've been an international rep. I've been a 14 director for the DOD NASA aerospace division. 15 Q. Okay. And when did you come on to SPFFPA, though? 16 A. Full time? 17 Q. Full time. 18 A. After I returned from Iraq in -- so it would have been 19 approximately June of '08. 20 Q. June of '08. Okay. 21 (Marked EXHIBIT A for identification) 22 BY MR. NUNLEY: 23 Q. I'm going to show you a document that's listed as your 24 deposition notice. I'm going to ask you some 25 questions on it after you've had a chance to review</p>
<p style="text-align: right;">Page 11</p> <p>1 Q. Yeah. 2 A. If you were to draw a line from Florida to West 3 Virginia across to Iowa, back down to Louisiana, back 4 to Florida, all the states involved in the middle to 5 include Puerto Rico and the Virgin Islands. It's on 6 our website. 7 Q. Does Region 2 include Kentucky? 8 A. Yes. 9 Q. And how long -- well, you said you just recently were 10 brought up to Vice President because you're still 11 handing off Region 2. How long have you held the 12 position of Vice President? 13 A. Vice President at Large or -- 14 Q. Yeah. At large. At large. 15 A. Since probably about February of last year. 16 Q. So February of 2021? 17 A. Um-hmm. 18 Q. And prior to that you were the Vice President of 19 Region 2? 20 A. Correct. 21 Q. And how long did you hold that position? 22 A. Since I believe June of '08. 23 Q. And then prior to the June of '08 how long did you -- 24 what position did you hold? If it was with SPFFPA. If 25 it wasn't, you know . . .</p>	<p style="text-align: right;">Page 13</p> <p>1 it. 2 A. Okay. 3 Q. All right. So have you ever seen that document before 4 today? 5 A. Yes. 6 Q. Okay. And when was the first time you saw that? 7 A. Three days ago. 8 Q. Three days ago. And how were you advised of your 9 deposition here today that you would need -- excuse 10 me. How were you advised of your deposition today? 11 A. I was told that I would be deposed sometime between 12 Wednesday and Friday of this week so I needed to 13 travel up here. I requested a document, was there any 14 such document, I want to say Monday, and I believe 15 Tuesday I received -- Monday or Tuesday I received 16 this document. 17 Q. Okay. So you requested the actual notice of 18 deposition to be transmitted to you? 19 A. Yeah. 20 Q. And so when was this conversation that you had and who 21 did you have this conversation with that you requested 22 this document? 23 A. I had this conversation with President Hickey. 24 Q. Okay. And do you know when? 25 A. I want to say it was Monday.</p>

RICK O'QUINN
March 24, 2022

<p style="text-align: right;">Page 14</p> <p>1 Q. Monday of this week? 2 A. Yeah. 3 Q. Okay. So prior to Monday of this week did you have 4 any other conversations relative to the deposition 5 here today? 6 A. Not other than I needed to come up here for a 7 deposition. 8 Q. Did you bring any documents with you today? 9 A. I did not. 10 Q. Okay. And you note that the notice of deposition asks 11 you to bring those documents; correct? 12 A. Any documents relative to these two number items, 1 13 and 2, on the following matters. 14 Q. Correct. And you didn't bring any documents with you? 15 A. Right. 16 MR. APEL: I'll just place on the record 17 that we formally objected to these overbroad 18 inappropriate time bar discovery requests. 19 MR. NUNLEY: And you didn't file any motion 20 to quash; correct? 21 MR. APEL: We filed our objections. 22 MR. NUNLEY: Objection is not a motion to 23 quash. 24 MR. APEL: I'll just say we submitted our 25 objections, not filed.</p>	<p style="text-align: right;">Page 16</p> <p>1 Q. And so if you've never been arrested, you've never 2 been convicted of any crimes; correct? 3 A. That's correct. 4 Q. So, sir, you are married; correct? 5 A. Correct. 6 Q. Okay. And it's my understanding your wife is in a 7 business that has security officers contained within 8 it; correct? 9 A. Yes. 10 Q. Okay. And the name of that business is Patronus? 11 A. Patronus Systems, Inc. 12 Q. Patronus Systems, Inc. And does she have any other 13 businesses where she employs security professionals? 14 A. No. 15 Q. Okay. And in the context of Patronus, has SPFFA ever 16 attempted to unionize an organization to which your 17 wife has been an owner of? 18 A. Could you restate that question? 19 Q. Sure. During the history of, you know, your marriage 20 with your wife and her being an owner of a company 21 that has security professionals, has SPFFA ever 22 attempted to organize any such shop? 23 A. I believe so. 24 Q. Okay. And can you tell me when? 25 A. I wouldn't know the exact dates.</p>
<p style="text-align: right;">Page 15</p> <p>1 BY MR. NUNLEY: 2 Q. All right. So if we could just briefly touch on your 3 educational history here. Can you tell us if you 4 graduated high school? 5 A. I did. 6 Q. And after your high school graduation did you attend 7 any trade schools, continuing education, or college? 8 A. Military Police Academy, army, Basic NCO Academy, 9 Primary Leadership Academy, Advanced NCO Academy. 10 Q. Okay. And how long -- obviously you were in the 11 military service. How long were you in the service 12 for? 13 A. Approximately 26 years. 14 Q. 26 years? And I assume you retired with full honors 15 and you're receiving a military pension now; correct? 16 A. I am not receiving a military pension yet. I have 17 applied for it because I don't draw one until over 60, 18 and yes, Bronze Star, Combat Action Badge, completely 19 honorable discharge. 20 Q. Great. Congratulations. 21 A. Thanks. 22 Q. Just because I have to get through some of these 23 questions and I know that sometimes they can be a 24 little -- have you ever been arrested? 25 A. No.</p>	<p style="text-align: right;">Page 17</p> <p>1 Q. Okay. Can you tell me the year? 2 A. Well, let's see. The last two years are vague only 3 because of Covid. 4 Q. I get that. 5 A. I'd be guessing. 6 Q. Okay. Does it help to -- maybe if you can tell me in 7 context of who -- where you were employed at at the 8 time. Were you the Region 2 Vice President? Were you 9 the Vice President at Large? 10 A. I was the Region 2 Vice President. 11 Q. Okay. And where is Patronus located? 12 A. Patronus the company? 13 Q. The Systems, yeah. Um-hmm? 14 A. It's located in Melbourne, Florida. 15 Q. Okay. And where does it have security professionals 16 operating out of? 17 A. I'm not sure of all the locations. 18 Q. Okay. Does it have security professionals operating 19 out of Kentucky? 20 A. I believe it does. 21 Q. Okay. And do you recall when Patronus first started 22 having security professionals operating out of the 23 state of Kentucky? 24 A. No. 25 Q. Did it coincide at the time when you were the Regional</p>

RICK O'QUINN
March 24, 2022

<p style="text-align: right;">Page 18</p> <p>1 Vice President of Region 2? 2 A. Yes. 3 Q. Okay. So at the time you were the Vice President of 4 Region 2 in charge of contract negotiation, your wife 5 was also operating a business within that same region 6 for security professionals who may need the assistance 7 of union representation? 8 A. I believe she did win a contract in Kentucky, and 9 Kentucky would be in the jurisdiction of Region 2 if 10 we had a contract in Region 2 in Kentucky. 11 Q. Okay. Did there ever come a time when a company run 12 by your wife was simultaneously being rep -- the 13 members were being represented by SPFFPA? 14 A. I believe my wife has won a contract where SPFFPA was 15 being represented. 16 Q. Okay. Do you know when that was? 17 A. I would be guessing. 18 Q. Was it 2014 are you aware? 19 A. It's possible. 20 Q. Would that company have been called Paragon Systems, 21 Inc., at the time? 22 A. You need to rephrase the question. 23 Q. Sure. The organization that your wife was a part of 24 at the time, was it Paragon Systems where SPFFPA was 25 representing the members of that particular union?</p>	<p style="text-align: right;">Page 20</p> <p>1 Patronus Systems, Inc., and Mabel O'Quinn, and I 2 believe that's your wife; correct? 3 A. That is correct. 4 Q. And it also lists on Line 10 a Paragon Systems, Inc., 5 and that lists a Laura Hagan; correct? 6 A. That's correct. 7 Q. Okay. So how is Paragon Systems, Inc., related, if at 8 all, with Patronus Systems, Inc.? 9 A. I had -- I worked with an attorney to make sure that I 10 correctly filled this out because obviously my 11 signature is on this and this is my submission. 12 Q. Yeah. And I was going to ask you a question. So 13 you're stating that the signature on Page 1 is yours; 14 correct? 15 A. That is correct. So in Part B having to do with the 16 business, and I'm going to -- 17 Q. Yeah. Please take your time. Read whatever you need 18 to. 19 A. Okay. If you were to review the latter -- or the more 20 recent LM-30s, you'll notice that on Page 2 of this 21 document it's absent everything, so if you were to 22 look at last year's form, it has nothing on Page 2. 23 The reason Page 2 is filled out in this manner is 24 because Patronus was a subcontractor to Paragon. 25 Q. Okay.</p>
<p style="text-align: right;">Page 19</p> <p>1 A. I still don't quite understand -- the way I'm reading 2 your question is is my wife, which is a hundred 3 percent owner of Patronus Systems, Inc., has never -- 4 that company's never been Paragon. 5 Q. Okay. How about has your wife ever had any ownership 6 of a company called Paragon Systems, Inc.? 7 A. No. She's never had any ownership in Paragon. 8 Q. Has she ever worked for Paragon Systems, Inc.? 9 A. No. 10 Q. Okay. So then I'm going to show you what I'm going to 11 mark as Exhibit B -- 12 MR. APEL: Are these two pages? 13 MR. NUNLEY: Yeah. It's a two-page 14 document. I didn't have a stapler available to me. 15 (Marked EXHIBIT B for identification) 16 BY MR. NUNLEY: 17 Q. Are you familiar with a Form LM-30? 18 A. I am. 19 Q. Okay. So at the contact information it lists Ricky 20 Dallas O'Quinn and that's you; correct? 21 A. That is correct. 22 Q. Okay. And it states you're the Vice President of 23 Region 2; correct? 24 A. That's correct. 25 Q. All right. And on Page 2 it lists a business name of</p>	<p style="text-align: right;">Page 21</p> <p>1 A. Okay. That no longer applied. And a substantial 2 amount of the business that was being done in the very 3 beginning, and let's see the date on this, covering 4 '14, this would have been where my wife had started a 5 business and was subcontracted to Paragon and I 6 believe in a Florida contract, and therefore it 7 required this to be filled out because a substantial 8 part where it talks about in Part B "A business, such 9 as a vendor or service provider, (1) a substantial 10 part of which consists of buying from, selling or 11 leasing to, or otherwise dealing with the business of 12 an employer described in part A." This is where there 13 was a substantial part of what she was doing, which 14 is -- I don't know how -- what the size was, is that 15 that's what -- that's why that was filled out in that 16 manner, is she was a subcontractor. Since then she's 17 a prime contractor for United States Government. 18 Q. Okay. I understand and I appreciate everything. So 19 Paragon Systems, Inc., in 2014, did it have a union 20 relationship with SPFFPA? 21 A. Did it have a union relationship with SPFFPA? 22 Q. Yeah. Did the members of Paragon Systems have a union 23 relationship with SPFFPA? 24 A. Somewhere in the country. 25 Q. And at the time Patronus was a subcontractor of</p>

RICK O'QUINN
March 24, 2022

<p style="text-align: right;">Page 22</p> <p>1 Paragon; correct? 2 A. Correct. 3 Q. Okay. And you completed this document in 2019, 4 though; correct? 5 A. That is correct. 6 Q. Why did you fill out a document five years later for 7 an entity which -- excuse me. Why did you fill out 8 this LM-30 five years later? 9 A. Because I was advised by an attorney that handles this 10 this is the way this would be completed. 11 Q. Who advised you of this? 12 A. Andy Roth is the attorney I used. 13 Q. Is Andy Roth a Michigan lawyer, Florida lawyer, 14 somewhere else? 15 A. DC. 16 Q. DC. Do you know if he has offices in Florida, 17 Michigan or elsewhere? 18 A. I don't think so. 19 Q. And did you retain him specifically for this purpose? 20 A. Yes. 21 Q. Okay. What was the reason that predicated the need to 22 retain Mr. Roth for purposes of completing this LM-30? 23 A. Because I was unaware of an LM-30 requirement. 24 Q. Okay. And why did you believe that there was an LM-30 25 requirement?</p>	<p style="text-align: right;">Page 24</p> <p>1 A. I don't remember. 2 Q. You don't recall. Okay. Did anyone other than 3 someone from Mr. Brooks or his firm tell you you 4 needed to complete an LM-30? 5 A. No. 6 Q. Did you have any discussions with anyone relative to 7 the completion of this LM-30 other than Mr. Brooks and 8 his firm? Other than Mr. Roth as well because I don't 9 want to hear anything between what you had with 10 Mr. Roth either. 11 A. No. I don't believe so. 12 Q. So you never had any discussions with Mr. Hickey about 13 the need to complete an LM-30? 14 A. I don't remember if I had a conversation with 15 Mr. Hickey over it. 16 Q. Okay. Would it be unusual for you to have a 17 conversation with Mr. Hickey given the fact that you 18 would need to complete an LM-30? 19 A. I don't know. I mean, I don't understand the 20 question. 21 Q. Well, this document relates to your dealings with -- 22 as a member of SPFPA; correct? 23 A. Correct. 24 Q. And this document relates to potential conflicts of 25 interest between yourself and your wife as it relates</p>
<p style="text-align: right;">Page 23</p> <p>1 A. Why did I believe it? 2 Q. Yes. 3 A. Because general counsel with Gordon Gregory advised me 4 that I needed to look into filling out an LM-30. 5 MR. APEL: And I just want to place an 6 objection -- 7 MR. NUNLEY: Yeah. And I was going to say 8 that. Yeah. 9 MR. APEL: Okay. 10 BY MR. NUNLEY: 11 Q. I don't want you to tell me any discussions you had 12 with Mr. Brooks or his law firm, so if I do ask that 13 question or I, you know, delve into that territory, 14 you don't have to answer anything relative to 15 communications you had with him. Okay? 16 So did Mr. Brooks come to you or someone 17 within his firm and say, hey, we need to fill out an 18 LM-30? 19 MR. APEL: I think we just -- you just said 20 that you weren't going to ask him about that. 21 BY MR. NUNLEY: 22 Q. Poorly worded question. I apologize. Poorly worded 23 question. 24 So how did you become aware that you needed 25 to complete an LM-30?</p>	<p style="text-align: right;">Page 25</p> <p>1 to your employment at SPFPA and her employment with 2 Paragon and/or Patronus; correct? 3 A. Well, my understanding was it's a document that's to 4 fill out to have full disclosure if there's -- you 5 meet these guidelines. 6 Q. And you're stating that you never had a conversation 7 with Mr. Hickey to say, hey, by the way, my wife owns 8 Patronus, by the way, she's a subcontractor with 9 Paragon, we might need to complete an LM-30? 10 A. I don't believe I had that conversation, but I do know 11 that I've made the organization fully aware of my 12 wife's dealings back in -- back at that timeline. 13 Q. So you made Mr. Hickey aware of your wife's interest 14 in Patronus in 2014? 15 A. Back when she originally started doing business. 16 Q. Okay. And when would that have been? 17 A. Whenever she become a subcontractor to Paragon. 18 Q. Do you have any idea of when that was? 19 A. Not at this current time, no. 20 Q. Okay. And then I'm going to show you another one, 21 another LM-30, and ask you to take a look at it. 22 A. Okay. 23 (Marked EXHIBIT C for identification) 24 BY MR. NUNLEY: 25 Q. And this LM-30 is similar in all contexts to the one</p>

RICK O'QUINN
March 24, 2022

<p style="text-align: right;">Page 26</p> <p>1 we just -- the previous one, which would be Exhibit B, 2 this one now would be Exhibit C, other than the fact 3 that it is 2015 as opposed to 2014; correct? 4 A. Correct. It covers -- it covers a different timeline. 5 Q. Okay. And, once again, this one is signed by you at 6 the bottom? 7 A. Yes. 8 Q. And it's dated the same date as the 2014? 9 A. That is correct. 10 Q. So it's safe to assume, then, that you completed this 11 on or about the same time that you completed the '14? 12 A. That's correct. 13 Q. Okay. Now, to the best of your knowledge, in 2014, 14 2000 -- well, from 2014 to present, to the best of 15 your knowledge, has SPFFA ever represented Patronus 16 and/or Paragon? 17 A. I don't believe your statement would be -- you might 18 want to reword that because SPFFA does not represent 19 Paragon. It does not represent -- 20 Q. Okay. I understand. 21 A. -- Patronus. 22 Q. What I'm talking about when I say represent, from the 23 standpoint of union representation. I know they don't 24 represent the company. Correct. 25 A. Just trying to be particular about what you're asking.</p>	<p style="text-align: right;">Page 28</p> <p>1 Q. Okay. And prior to that there was no LM-30 on file 2 because this wasn't filed until 2019; correct? 3 A. That's correct. 4 Q. Okay. Based on your understanding, and I'm not asking 5 what your attorneys may have told you, but based on 6 your understanding of conversation, would you believe 7 that that's a violation of the labor act? 8 A. I believe that based on the attorney that I used on 9 this that I was at the time unaware of any requirement 10 other than advising union and counsel that my wife 11 owned a business. 12 Q. So prior to 2019 did you ever have a conversation with 13 Mr. Hickey relative to the union representation of its 14 employees of Paragon or Patronus that your wife had an 15 interest in either Paragon and/or Patronus? 16 A. Could you rephrase that? 17 Q. Sure. Absolutely. So prior to 2019, so prior to the 18 filing of these documents, did you ever have a 19 conversation with Mr. Hickey about your wife's 20 interest in either Patronus and/or Paragon while 21 simultaneously SPFFA was representing its employees? 22 A. I had an -- I know if you were to read back in the 23 transcripts I stated that I advised the international 24 president and general counsel from the very moment my 25 wife had a subcontract with Paragon. I advised them</p>
<p style="text-align: right;">Page 27</p> <p>1 Q. Absolutely. I understand. 2 MR. APEL: Is there a question? 3 MR. NUNLEY: Yeah. 4 A. What exactly is the question? 5 BY MR. NUNLEY: 6 Q. From 2014 to present has SPFFA ever represented from a 7 union standpoint either Patronus or Paragon? 8 A. Look, I don't want to be smart. 9 Q. The employees. 10 A. Represent the employee -- I don't want to put words in 11 your mouth either. 12 Q. I appreciate it. I want clarity. We all want clarity 13 on the record. So if you want me to ask it again, I 14 will. From 2014 to present has SPFFA ever represented 15 the employees of Paragon or Patronus? 16 A. Yes. 17 Q. Okay. And what years did they represent those 18 employees? 19 A. That I'm not sure of. 20 Q. Was it prior to 2019? 21 A. I would say yes. 22 Q. Okay. So prior to 2019 there was representation by 23 SPFFA of its employees, union representation of 24 Patronus and/or Paragon? 25 A. Yes.</p>	<p style="text-align: right;">Page 29</p> <p>1 that -- and I asked would there be -- did they feel 2 there was any conflict of interest and the -- 3 MR. APEL: Just to be clear, to the extent 4 you're talking about conversations you had with 5 counsel -- 6 MR. NUNLEY: Listen, you are not allowed to 7 interject when he's answering a question. 8 MR. APEL: I am going to make sure that a 9 lay witness does not inadvertently waive his 10 attorney-client privilege. 11 MR. NUNLEY: I think that's been made 12 perfectly clear on several occasions he's not to 13 answer. 14 MR. APEL: Well, I will remind you that if 15 you're talking about conversations that you had with 16 other employees or board members of SPFFA and counsel 17 that those would be privileged. You can continue your 18 answer to the extent that you had these conversations 19 without counsel. 20 BY MR. NUNLEY: 21 Q. Let's take a step back here. Would you disagree with 22 the fact that your wife started Patronus in 2010? 23 A. Would I -- 24 Q. Disagree with that. 25 A. I wouldn't disagree with that.</p>

Page 30

1 Q. Okay. And in 2010 you were the Vice President for
2 Region 2?
3 A. Correct.
4 Q. Okay. And you've stated already on the record that
5 since your wife's relationship with Patronus you have
6 advised Mr. Hickey and the executive team of that
7 relationship with your wife and Patronus; correct?
8 A. Correct.
9 Q. Okay. So then it's fair to assume that as of 2010
10 moving forward Mr. Hickey was aware of the fact that
11 you and your wife had a -- strike that.
12 Mr. Hickey was aware moving from 2010
13 forward that there is a potential for conflict given
14 your wife's ownership of Patronus and your position
15 within SPFPA?
16 MR. APEL: I'll just object to the extent
17 it calls for speculation of what somebody else knows.
18 MR. NUNLEY: I didn't ask that at all.
19 MR. APEL: You asked what Mr. Hickey knew.
20 If you know what Mr. Hickey knew or not,
21 you can answer.
22 MR. NUNLEY: He does because he
23 specifically told Mr. Hickey.
24 A. I didn't tell him in 2010.
25 BY MR. NUNLEY:

Page 31

1 Q. Well, you said you told him after your wife's
2 relationship began with Patronus.
3 A. My wife didn't have a relationship with -- she had a
4 relationship with Patronus but not with Paragon.
5 Q. Okay. But she started her company in 2010?
6 A. Um-hmm.
7 Q. Okay. And you advised Mr. Hickey of that relationship
8 when it started based on your prior testimony?
9 A. No. That's not what I said.
10 Q. Okay. Then clarify to me. What did you say?
11 A. Okay. My wife started a business in 2010. She had no
12 revenue, no relationship, no nothing when she started
13 the business until sometime in 2014 I think. All
14 right. So the business didn't make a profit. It was
15 expensive. A number of things that she did to
16 develop -- in developing the business. And it was a
17 part-time process. At some point she gained a
18 subcontract with Paragon and I advised Mr. Hickey.
19 Q. Did she gain that contract in 2015?
20 A. I'm unsure.
21 Q. Okay. So whenever she gained that contract with
22 Paragon is when you would have advised Mr. Hickey of
23 the relationship between herself and Paragon/Patronus
24 and your relationship with SPFPA?
25 A. Correct.

Page 32

1 Q. Okay. Do you believe that relationship occurred --
2 that conversation with Mr. Hickey occurred prior to
3 April 7th, 2019?
4 A. Yes.
5 Q. Did there come a time when Mr. Hickey ever advised
6 you, hey, you need to fill out an LM-30 because of
7 this relationship between your wife and yourself?
8 A. No.
9 (Marked EXHIBIT D for identification)
10 BY MR. NUNLEY:
11 Q. I'm going to show you what will now be marked
12 Exhibit D and ask if you can identify it.
13 A. I recognize the document.
14 Q. Okay. So this document, once again, it pretty much
15 mirrors the previous two exhibits, does it not?
16 A. For the most part.
17 Q. Okay. And the only difference I believe is the date,
18 which is the coverage period of 2016?
19 A. There may be some slight differences.
20 Q. What? Some file numbers or something? What are the
21 differences? I'm sorry. Dollar amount differences,
22 too, yes.
23 MR. APEL: You want him to compare line by
24 line these two documents that --
25 MR. NUNLEY: You don't have to compare the

Page 33

1 printed form but the information that he typed in.
2 MR. APEL: These documents speak for
3 themselves. I don't know why you need him to point
4 out all the differences to you.
5 MR. NUNLEY: Okay. Well, I appreciate your
6 critique, but I'm not asking you any questions.
7 A. Well, you're asking me to match these documents.
8 BY MR. NUNLEY:
9 Q. Correct. Is there any dissimilarity other than the
10 dollar amounts and the coverage dates and the file
11 number?
12 A. There's a number of lines that are different. 11.b,
13 12.b.
14 Q. Okay. Has SPFPA ever sought to represent the
15 employees of Patronus and/or Paragon?
16 A. I would have to say yes, but I wouldn't know exactly
17 when.
18 Q. Okay. That's fine. So you're not -- as you sit here
19 today, you're not sure of when they did it but you're
20 aware that they have attempted to?
21 A. Yes.
22 Q. Okay. Can you tell me how you became -- strike that.
23 So you state that SPFPA has attempted to
24 represent the employees of Paragon and/or Patronus.
25 Can you tell me how SPFPA came about to know that

RICK O'QUINN
March 24, 2022

<p style="text-align: right;">Page 34</p> <p>1 those employees needed representation?</p> <p>2 MR. APEL: Just object to being a vague</p> <p>3 question. You're not even specifying who "they" is.</p> <p>4 But go ahead if you're able to answer.</p> <p>5 A. Actually you stated it. I didn't. I did not state</p> <p>6 that they did this. You asked me a question and I</p> <p>7 said I believe.</p> <p>8 BY MR. NUNLEY:</p> <p>9 Q. Okay.</p> <p>10 A. So could you ask the --</p> <p>11 Q. Sure. Absolutely. I'll be more than happy to. So</p> <p>12 you believe that SPFFPA has attempted to represent the</p> <p>13 employees of either Paragon and/or Patronus; is that a</p> <p>14 fair statement?</p> <p>15 A. Yes.</p> <p>16 Q. Okay. Now, based on that belief of that statement, do</p> <p>17 you know how SPFFPA would have come about the</p> <p>18 information that those employees, being Patronus</p> <p>19 and/or Paragon, needed representation?</p> <p>20 A. No.</p> <p>21 Q. Okay. Would that information have come directly from</p> <p>22 your wife?</p> <p>23 A. No.</p> <p>24 Q. Okay. Are you aware of whether or not SPFFPA presently</p> <p>25 has a Collective Bargaining Agreement with Patronus?</p>	<p style="text-align: right;">Page 36</p> <p>1 A. That's correct.</p> <p>2 Q. Okay. And is there a reason you're not involved with</p> <p>3 that particular contract?</p> <p>4 A. The reason is when I advised the Vice -- the President</p> <p>5 of the organization that my wife had a business and</p> <p>6 was going to be involved with Paragon that we agreed</p> <p>7 that I would not be involved in any negotiations with</p> <p>8 Paragon or Patronus.</p> <p>9 Q. Did the members of Paragon or Patronus know of your</p> <p>10 relationship and your wife's relationship between</p> <p>11 SPFFPA and/or Paragon and Patronus?</p> <p>12 MR. APEL: Objection. Calls for</p> <p>13 speculation of what other people knew.</p> <p>14 BY MR. NUNLEY:</p> <p>15 Q. Did you provide any notice to them? And I don't mean</p> <p>16 you personally. I mean, did SPFFPA provide any notice</p> <p>17 to the potential members that, hey, listen, just so</p> <p>18 everybody's aware, the Vice President at Large, the</p> <p>19 former Region 2 Vice President's wife owns this</p> <p>20 company?</p> <p>21 A. The local president of West Virginia was advised that</p> <p>22 I would not be moving forward in handling any of that</p> <p>23 negotiations because my wife had won the contract in</p> <p>24 West Virginia and it was under a different company and</p> <p>25 I would not be participating in the negotiations</p>
<p style="text-align: right;">Page 35</p> <p>1 A. I am aware.</p> <p>2 Q. Okay. And can you give me the details of that</p> <p>3 particular Collective Bargaining Agreement?</p> <p>4 A. No.</p> <p>5 Q. Why?</p> <p>6 A. Because I'm not involved in that negotiations.</p> <p>7 Q. Can you give me who is involved with that negotiation?</p> <p>8 A. Jerry Heyman.</p> <p>9 Q. Jerry Aman?</p> <p>10 A. Jerry Heyman.</p> <p>11 Q. Heyman. Okay. Could you spell the last name for me,</p> <p>12 please?</p> <p>13 A. H-E-Y-M-A-N.</p> <p>14 Q. Okay. And is he an employee of SPFFPA?</p> <p>15 A. Yes.</p> <p>16 Q. And what's his job title?</p> <p>17 A. Vice President of Region 2.</p> <p>18 Q. Oh, so he's the gentleman who's taking over your</p> <p>19 position?</p> <p>20 A. Yes.</p> <p>21 Q. So you stated earlier that you're still involved,</p> <p>22 though, with the contracting as you're wading through</p> <p>23 that transition out of being the Region 2 Vice</p> <p>24 President, so you're saying you're not involved in</p> <p>25 that particular contract?</p>	<p style="text-align: right;">Page 37</p> <p>1 because my wife owned the business that won the</p> <p>2 contract.</p> <p>3 Q. Okay. That's in West Virginia. What about any other</p> <p>4 locations where your wife had won the contract and</p> <p>5 SPFFPA sought to represent the members of those</p> <p>6 particular organizations?</p> <p>7 A. I only know of one location vaguely that SPFFPA sought</p> <p>8 to represent employees where my wife's business was</p> <p>9 the employer.</p> <p>10 Q. Okay. And that's the West Virginia?</p> <p>11 A. (Nodding.)</p> <p>12 Q. Okay. What location is that?</p> <p>13 A. That was in Kentucky.</p> <p>14 Q. So wouldn't you have also known about the West</p> <p>15 Virginia location?</p> <p>16 A. The West Virginia location was represented by SPFFPA</p> <p>17 and has been for probably 20 years with multiple</p> <p>18 different employers there.</p> <p>19 Q. All right. So SPFFPA has represented those members for</p> <p>20 how long, the ones in West Virginia?</p> <p>21 A. I don't know the exact timeline of the charter, but I</p> <p>22 know it was -- it was long before I become VP.</p> <p>23 Q. Okay. And your wife acquired that contract in West</p> <p>24 Virginia in what year?</p> <p>25 A. I'm uncertain at this point.</p>

RICK O'QUINN
March 24, 2022

Page 38

1 Q. Okay. And so then now let's talk about the Kentucky.
2 That's a contract she also just recently acquired?
3 A. Again, I'm uncertain of those timelines because I
4 don't -- I don't monitor her business. At the time
5 she won the Kentucky contract, what little knowledge I
6 have about it, SPFFPA did not represent the personnel
7 in that state.
8 Q. So just to be clear, so, and I'm not trying to be
9 funny or anything, so your wife wins a contract in
10 West Virginia, your wife wins a contract in Kentucky.
11 She doesn't come home and say, hey, Rick, guess what I
12 just did today, I won the contract in Kentucky?
13 A. The wife does tell me if she won something. Okay?
14 But no details. I'm not involved with her business.
15 I don't sit on any board. I don't give her advice.
16 It's her business.
17 Q. I understand that. You probably keep an arm's length
18 transaction. But you're not suggesting, though, that
19 you don't receive any benefit from that, though, do
20 you?
21 MR. APEL: Objection.
22 A. It says it right here.
23 BY MR. NUNLEY:
24 Q. Okay.
25 A. Okay?

Page 39

1 Q. Sir, calm down.
2 A. I'm fine.
3 Q. Relax. Relax. All right. So you do receive a
4 benefit?
5 A. I'm married to her.
6 Q. Okay. So the answer to that question is yes?
7 MR. APEL: He's answered his question. He
8 can answer how he wants.
9 A. I've answered it more than once. You see the
10 documents, you know, and I've stated that I do not
11 have business conversations with my wife over what she
12 does in her business and she doesn't have
13 conversations with me about what I do in the union.
14 BY MR. NUNLEY:
15 Q. Okay. So are you familiar with the -- are you
16 familiar with the Labor Management Reporting and
17 Disclosure Act of 1959?
18 A. Vaguely.
19 Q. Okay. Do you know whether or not that act says as
20 long as my wife doesn't have conversations with me
21 it's okay to have business dealings with my wife and
22 union representation or does it say any pecuniary
23 gain?
24 A. I -- no. I don't understand the question.
25 Q. Okay. Well, you keep on stating, well, I don't have

Page 40

1 any conversations with my wife about her, you know,
2 winning contracts. Is that the extent to what you
3 believe the knowledge -- as long as you don't have any
4 knowledge of where she has her contracts, you're
5 complying with the requirements of the Labor
6 Management Disclosure Act?
7 A. No.
8 MR. APEL: Objection. Just calls for
9 speculation.
10 Answer if you know.
11 A. I do not know. What I do know is is that I'm required
12 to disclose because I'm a union official, I'm required
13 to disclose what she does and how much she makes based
14 on the fact that she has a relationship dealing with,
15 A, a company that this union deals with or, B, this
16 union deals with her company and that I'm required to
17 disclose that, which I am doing on an annual basis.
18 BY MR. NUNLEY:
19 Q. Starting in 2019?
20 A. And they've all been addressed all the way back to the
21 very beginning.
22 Q. Because you dated them for 2019?
23 A. No. Because I was guided to understand and comply
24 with what was necessary.
25 Q. But in 2014 you didn't comply. You complied in 2019.

Page 41

1 A. I was unaware of any requirement.
2 Q. In 2015 you didn't comply. You complied in 2019.
3 A. I complied when these documents were filled out and --
4 Q. How about 2017?
5 A. I don't remember other than these documents have a
6 date on them, and it's evident that I fill them out
7 and dated them during that timeline and submitted them
8 to the United States Government.
9 Q. How about 2018?
10 MR. APEL: What's the question? How about
11 the year?
12 BY MR. NUNLEY:
13 Q. Did you complete the form in 2018?
14 A. Well, first off, I need to reflect on the forms. You
15 probably have them all.
16 Q. Sir, I'm asking you a simple question. Did you
17 complete a form in 2018 for an LM-30?
18 MR. APEL: If you know.
19 A. I do not know.
20 BY MR. NUNLEY:
21 Q. You don't know. Do you know if you completed one for
22 2019?
23 A. I do not know.
24 Q. How about 2020?
25 A. I have to believe I completed one in 2020.

RICK O'QUINN
March 24, 2022

<p style="text-align: right;">Page 42</p> <p>1 Q. Okay. How about 2021? 2 A. Yes. 3 Q. You know for a fact you did 2021? 4 A. 2021 would be for the year 2021 or 2021 for the year 5 2020? 6 Q. Well, I assume you're supposed to fill out the 7 coverage period. What I'm asking you, not the date 8 you signed it. I'm asking you the coverage period. 9 So the year of 2021 did you complete a form that 10 covered you for the coverage period of 2021? 11 A. No. Do you want to know why or you just -- 12 Q. I may ask why. 13 A. Okay. 14 MR. APEL: He's going to be the one asking 15 questions. 16 A. Okay. 17 BY MR. NUNLEY: 18 Q. Why don't you tell me why, then. 19 A. Because it's due in a week and it's being formulated 20 and reviewed by my attorney now, and then it's 21 required to be turned in by the last day of March for 22 the year prior. 23 Q. And I think we discussed that a little yesterday. So 24 LM reports aren't due on the last day of the fiscal 25 year. They're due probably a couple months</p>	<p style="text-align: right;">Page 44</p> <p>1 of any of the campaign literature that would be 2 involved -- would you be involved with any of the 3 campaign literature for any new union outfit you're 4 trying to get or retention of an existing union 5 outfit? 6 A. No. 7 Q. Okay. So you wouldn't be involved with any of the 8 creations of the posts? You would have just merely 9 seen them; correct? 10 A. Correct. 11 Q. Okay. How about as now the Vice President at Large? 12 Are you involved with any discussions or conversations 13 with Mr. Hickey or anyone else relative to postings 14 that include Mr. Maritas and/or LEOSU? And I'll even 15 add in there the United Federation LEOS-PBA. 16 A. No. 17 Q. So you're not involved with any of those discussions 18 either? 19 A. No. 20 Q. Sir, do you have a working definition in your own mind 21 of what the word "corruption" means? 22 A. No. 23 Q. Okay. How about if someone were to say an 24 organization is corrupt? What, in your mind, would 25 that mean?</p>
<p style="text-align: right;">Page 43</p> <p>1 thereafter; correct? 2 A. Right. 3 Q. And you'll have the '21 return in a timely fashion? 4 A. Right. 5 Q. In your position as Region 2 director -- excuse me, 6 Region 2 Vice President, did you have ever occasion to 7 be involved with the campaigning for new members 8 and/or the retention of old members? 9 A. Yes. 10 Q. Okay. And during the course of those campaigns did 11 you ever come across postings by your employer related 12 to content involving Mr. Maritas and/or LEOSU? 13 A. I may have. 14 Q. Okay. Do you recall any of those posts? 15 A. Not offhand, no. 16 Q. Do you recall any of the content of any of those 17 posts? 18 A. No. There's been a lot of campaigns run over the 19 years where I'm mainly dealing with the contracts in 20 the region, and if there is a campaign within my 21 region, I may be involved at some point in the 22 campaign or I may not be involved and I get a report 23 down that says there's a new unit and here's where it 24 is. 25 Q. Okay. And so would you be involved with the creation</p>	<p style="text-align: right;">Page 45</p> <p>1 MR. APEL: Objection. He just said he 2 doesn't have a working definition of it. 3 MR. NUNLEY: And that's why I changed the 4 question. 5 A. I still don't have a working definition of it. 6 BY MR. NUNLEY: 7 Q. Okay. So if someone were to say that organization is 8 corrupt, you have no opinion as to what that would 9 mean? 10 A. An opinion? 11 Q. Yeah. 12 A. I guess it would depend on the context of where it's 13 coming from. 14 Q. Okay. So if it came from a rival, you may not give it 15 as much credence as you would if it came from a person 16 within the organization? 17 A. I don't know if I would do that either way. 18 Q. Well, you stated the question. I'm just trying to 19 figure out what you meant by it, so if you can 20 elaborate, then, I'd appreciate it. 21 A. I think the only time I've ever seen the word 22 "corrupt" is where allegations on this organization. 23 Q. So the only time you've ever seen anything relative to 24 corrupt is when you've seen something saying that 25 SPFFPA is corrupt?</p>

Page 46

1 A. I've seen a couple other things if I'm surfing the
2 net.
3 Q. Okay. Do you give anything more or less credence
4 based on the source of the information?
5 A. Probably not.
6 Q. Do you have a working definition or an idea as to what
7 the word "lawless" means to you?
8 A. No.
9 Q. Okay. So if someone commits a crime, does that make
10 him lawless?
11 MR. APEL: Objection. He just said he
12 didn't know what lawless meant.
13 MR. NUNLEY: So then I asked him a question
14 and followed up.
15 A. I probably never heard that term used like that
16 before.
17 BY MR. NUNLEY:
18 Q. Okay. So you never heard the term used like that.
19 That's fine. Okay. Very good.
20 Prior to your deposition testimony today,
21 have you made any written and/or recorded statements
22 relative to the issues that are contained within this
23 lawsuit?
24 A. I'm not aware of what's contained in this lawsuit.
25 Q. Okay. You're aware generally, though, that the

Page 47

1 lawsuit revolves around allegations of defamation and
2 related matters relative to defamation?
3 A. That would be a fair statement. Just vague.
4 Q. Yeah. I mean, I know there's some false light, but
5 we're not going to get into that, which is a kind of a
6 genre of defamation. There's also tortious
7 interference with business. You've heard of that?
8 A. No.
9 Q. Okay. Have you reviewed the Complaints in this case
10 at all?
11 A. None.
12 Q. None at all. Okay. But you haven't -- nobody's asked
13 you to make any written statements or recorded any
14 statements relative to anything between my clients and
15 SPFPA, Mr. Hickey, or Mr. Phillips?
16 A. I don't know of anything.
17 Q. Okay. Very good.
18 MR. NUNLEY: I think I'm just about done,
19 but I'm going to need a couple minutes here. Okay?
20 MR. APEL: Okay.
21 (Recess taken at 12:54 p.m.)
22 (Back on the record at 12:56 p.m.)
23 BY MR. NUNLEY:
24 Q. So just to be clear, you said that you were not
25 familiar with the allegations contained within the

Page 48

1 lawsuit; correct?
2 A. Correct. I've never -- never read any of the
3 documents or anything.
4 Q. You're on the executive board, though, for SPFPA?
5 A. Correct.
6 Q. And you don't believe it's within your duties as an
7 executive board member to review legal proceedings
8 that are brought against and on behalf of the
9 executive board?
10 A. I didn't say that.
11 Q. Is there a reason, then, you haven't reviewed them?
12 A. Other than I'm not -- at this point I understand
13 there's a lawsuit and it's being processed.
14 Q. Okay. So who advised you of there being a lawsuit and
15 it being processed?
16 A. International President.
17 Q. So Mr. Hickey told you that there was a lawsuit and
18 it's being processed?
19 A. Correct.
20 Q. And did he tell you, hey, we're going to be in this
21 litigation for the next so many years?
22 A. Never come up.
23 Q. Did he ever ask you any -- did he ever advise you how
24 much of the union's money he would spend on this
25 litigation?

Page 49

1 A. We review expenses, but, you know -- no.
2 Q. Okay. Did you ever question Mr. Hickey on it?
3 A. No.
4 Q. Is there a reason you wouldn't question Mr. Hickey on
5 such an expenditure of -- based on what's been spent
6 so far on these litigations?
7 A. In my opinion, we're going to do whatever's necessary
8 to protect the name of an organization that's 74 years
9 old.
10 Q. So regardless, you would have just rubber stamped
11 whatever Mr. Hickey said relative to this litigation?
12 A. No. No. I didn't say rubber stamp.
13 Q. Is there a point at which you're going to start to
14 question whether or not you're spending the union's
15 money properly in this litigation?
16 MR. APEL: Objection. Calls for a
17 hypothetical about what he might or might not do in
18 the future.
19 A. I'm fully comfortable with the direction we're going
20 right now. If I question the direction we're going,
21 I'll advise the President of my concern.
22 BY MR. NUNLEY:
23 Q. Okay. And can you give me an instance where you have
24 questioned the President in the past on a decision
25 that he's made?

<p style="text-align: right;">Page 50</p> <p>1 A. I'm sure there's a number of issues that I question 2 him on, but I don't think I need to talk about the 3 inner -- inner makings of the union. 4 Q. Well, I'm asking you give me one instance. 5 A. Not right offhand, but we do -- we do disagree on a 6 number of occasions. 7 Q. But you can't give me a single instance? 8 A. I'd have to think a minute. 9 Q. Well, we'll move on. So do you know how much money 10 has been spent to date in the litigations with 11 Mr. Maritas? 12 A. No. 13 Q. Okay. Are you aware based on your union's 14 constitution whether the payment of legal expenses 15 requires authorization by the executive board? 16 A. I'm aware that all our expenses require us to approve 17 them. 18 Q. Okay. And so you review bills prior to approving 19 those expenses? 20 A. So far we've approved all the expenses. 21 Q. So did you review the bills, though, related to those 22 expenses? 23 A. No. 24 Q. No, you did not? 25 A. Hmm-mm.</p>	<p style="text-align: right;">Page 52</p> <p>1 Mr. Hickey and/or Mr. Phillips? 2 A. No. 3 MR. NUNLEY: Okay. I have no further 4 questions. 5 MR. APEL: No questions. 6 (The deposition was concluded at 1:01 p.m. 7 Signature of the witness was not requested by 8 counsel for the respective parties hereto.) 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25</p>
<p style="text-align: right;">Page 51</p> <p>1 Q. So how can you know that the information contained 2 within the invoices is accurate if you didn't review 3 the invoices? 4 A. That's what we have trustees for. 5 Q. Okay. So who would have reviewed the information 6 contained in the invoices for legal expenses? 7 A. The three trustees that we have elected. 8 Q. Okay. And who are those? 9 A. Lieu Tartack, Harger, and Bernard Hudley. 10 Q. Okay. I heard Lou Tartack and Bernard Hudley. I 11 didn't hear the middle one. I'm sorry. 12 A. Scott Harger. 13 Q. Scott Harter? 14 A. Harger. 15 Q. Harger. So it's the responsibility of those three 16 individuals to review the information, and if they 17 have a question, then they bring it to the executive 18 board? 19 A. The secretary -- the secretary/treasurer would be the 20 first one I'm sure they would approach first. 21 Q. And you have not heard any disagreements with the 22 invoices that have been presented to date? 23 A. I have heard none. 24 Q. And have you seen any of those expenses on any of 25 those invoices related to expenses related to</p>	<p style="text-align: right;">Page 53</p> <p>1 CERTIFICATE OF NOTARY 2 STATE OF MICHIGAN) 3) SS 4 COUNTY OF WAYNE) 5 6 I, Cheri L. Poplin, certify that this 7 deposition was taken before me on the date 8 hereinbefore set forth; that the foregoing questions 9 and answers were recorded by me stenographically and 10 reduced to computer transcription; that this is a 11 true, full and correct transcript of my stenographic 12 notes so taken; and that I am not related to, nor of 13 counsel to either party nor interested in the event of 14 this cause. 15 16 17 18 19  20 21 22 Cheri L. Poplin, CSR 5132, RPR, CRR 23 Notary Public, 24 Wayne County, Michigan 25 My Commission expires: August 21, 2025</p>

<hr/> Exhibits <hr/>	12:54	41:4	Absolutely
EX A Rick O' Quinn 032422	47:21	2018	27:1 28:17 34:11
5:12 12:21	12:56	41:9,13,17	Academy
EX B Rick O' Quinn 032422	47:22	2019	15:8,9
5:13 19:11,15 26:1	14	22:3 27:20,22	acquired
EX C Rick O' Quinn 032422	21:4 26:11	28:2,12,17	37:23 38:2
5:14 25:23 26:2	1959	32:3 40:19,22,	act
EX D Rick O' Quinn 032422	39:17	25 41:2,22	28:7 39:17,19
5:15 32:9,12	1984	2020	40:6
<hr/> (<hr/>	12:5,6,10	41:24,25 42:5	Action
(1)	<hr/> 2 <hr/>	2021	15:18
21:9	2	11:16 42:1,3,	actual
<hr/> 0 <hr/>	10:1,2,3,4,8, 21,22 11:7,11, 19 14:13 17:8, 10 18:1,4,9,10	4,9,10	13:17
08	19:23,25	2022	add
11:22,23 12:19,20	20:20,22,23	6:2	44:15
<hr/> 1 <hr/>	30:2 35:17,23	21	addressed
1	36:19 43:5,6	43:3	40:20
14:12 20:13	20	24	Advanced
10	37:17	6:2	15:9
20:4	2000	26	advice
<hr/> 1 <hr/>	26:14	15:13,14	38:15
11.b	2010	<hr/> 4 <hr/>	advised
33:12	29:22 30:1,9, 12,24 31:5,11	9:24	13:8,10 22:9, 11 23:3 28:23, 25 30:6 31:7, 18,22 32:5 36:4,21
12.b	2014	<hr/> 6 <hr/>	advising
33:13	18:18 21:19 25:14 26:3,8, 13,14 27:6,14 31:13 40:25	60	28:10
12:01	2015	15:17	aerospace
6:3	26:3 31:19	<hr/> 7 <hr/>	12:14
	41:2	7th	agreed
	2016	32:3	36:6
	32:18	<hr/> A <hr/>	Agreement
	2017	absent	34:25 35:3
		20:21	ahead
			34:4

allegations 45:22 47:1,25	15:17 21:1	aware 6:15,18 18:18 23:24 25:11,13 30:10,12 33:20 34:24 35:1 36:18 46:24,25	briefly 8:20 15:2
allowed 29:6	approximately 12:19 15:13		bring 14:8,11,14
Aman 35:9	April 32:3		Bronze 15:18
amount 21:2 32:21	arm's 38:17	<hr/> B <hr/>	Brooks 23:12,16 24:3, 7
amounts 33:10	army 15:8	back 11:3 12:11 25:12,15 28:22 29:21 40:20 47:22	brought 8:2,11 9:22 11:10
and/or 9:23 25:2 26:16 27:24 28:15,20 33:15,24 34:13,19 36:11 43:8,12 44:14 46:21	arrested 15:24 16:1	Badge 15:18	business 16:7,10 18:5 19:25 20:16 21:2,5,8,11 25:15 28:11 31:11,13,14,16 36:5 37:1,8 38:4,14,16 39:11,12,21 47:7
Andy 22:12,13	asks 14:10	bar 14:18	businesses 16:13
annual 40:17	assigned 9:14	Bargaining 34:25 35:3	buying 21:10
answering 29:7	assist 10:19	based 28:4,5,8 31:8 34:16 40:13 46:4	
answers 6:25	assistance 18:6	Basic 15:8	<hr/> C <hr/>
APEL 14:16,21,24 19:12 23:5,9, 19 27:2 29:3, 8,14 30:16,19 32:23 33:2 34:2 36:12 38:21 39:7 40:8 41:10,18 42:14 45:1 46:11 47:20	attempted 16:16,22 33:20,23 34:12	basis 40:17	called 6:6 18:20 19:6
apologize 23:22	attend 15:6	began 31:2	calls 30:17 36:12 40:8
applied	attorney 6:12 20:9 22:9,12 28:8 42:20	beginning 21:3 40:21	calm 39:1
	attorney-client 29:10	belief 34:16	Calvin 6:13
	attorneys 28:5	benefit 38:19 39:4	campaign 43:20,22 44:1,
	audibly 6:25	board 29:16 38:15	
		bottom 26:6	

3	company 16:20 17:12 18:11,20 19:6 26:24 31:5	contact 19:19	convicted 16:2
campaigning 43:7	company's 19:4	contained 16:7 46:22,24 47:25	correct 7:17 8:22,23 9:11 11:20 14:11,14,20 15:15 16:2,3, 4,5,8 19:20, 21,23,24 20:2, 3,5,6,14,15 22:1,2,4,5 24:22,23 25:2 26:3,4,9,12,24 28:2,3 30:3,7, 8 31:25 33:9 36:1 43:1 44:9,10
campaigns 43:10,18	compare 32:23,25	content 43:12,16	correctly 20:10
case 47:9	Complaints 47:9	context 7:22 16:15 17:7 45:12	corrupt 44:24 45:8,22, 24,25
chance 12:25	complete 23:25 24:4,13, 18 25:9 41:13, 17 42:9	contexts 25:25	corruption 44:21
changed 45:3	completed 22:3,10 26:10, 11 41:21,25	continue 10:7 29:17	counsel 23:3 28:10,24 29:5,16,19
charge 8:10,11 18:4	completely 15:18	continuing 15:7	country 21:24
charges 8:2	completing 22:22	contract 9:22 18:4,8, 10,14 21:6 31:19,21 35:25 36:3,23 37:2, 4,23 38:2,5,9, 10,12	couple 42:25 46:1 47:19
charter 37:21	completion 24:7	contracting 35:22	court 7:1,16
clarify 31:10	complied 40:25 41:2,3	contractor 21:17	coverage 32:18 33:10 42:7,8,10
clarity 27:12	comply 40:23,25 41:2	contracts 9:18,20,21 10:8,11,13,17 40:2,4 43:19	covered 42:10
clear 29:3,12 38:8 47:24	complying 40:5	conversation 13:20,21,23 24:14,17 25:6, 10 28:6,12,19 32:2	covering 21:3
clients 47:14	conflict 29:2 30:13	conversations 14:4 29:4,15, 18 39:11,13,20 40:1 44:12	
coincide 17:25	conflicts 24:24		
Collective 34:25 35:3	Congratulations 15:20		
college 15:7	consists 21:10		
Combat 15:18			
commits 46:9			
communications 23:15			

covers 26:4	dealing 21:11 40:14 43:19	directly 10:13,14 34:21	dollar 32:21 33:10
Covid 17:3	dealings 24:21 25:12 39:21	director 9:19,20,23,24 10:4,9,15 12:14 43:5	draw 11:2 15:17
creation 43:25	deals 40:15,16	disagree 29:21,24,25	due 42:19,24,25
creations 44:8	defamation 47:1,2,6	discharge 15:19	dues 12:3,5
credence 45:15 46:3	defendant 7:20	disclose 40:12,13,17	duly 6:7
crime 46:9	definition 44:20 45:2,5 46:6	disclosure 25:4 39:17 40:6	duties 9:12,22
crimes 16:2	delve 23:13	discovery 6:15 14:18	<hr/> E <hr/>
critique 33:6	depend 45:12	discussed 42:23	earlier 35:21
current 25:19	deposed 13:11	discussions 23:11 24:6,12 44:12,17	education 15:7
<hr/> D <hr/>	deposition 6:15 7:12 8:17 12:24 13:9,10, 18 14:4,7,10 46:20	dissimilarity 33:9	educational 15:3
Dallas 19:20	depositions 7:15,19,25 8:15	division 12:14	elaborate 45:20
date 21:3 26:8 32:17 41:6 42:7	details 35:2 38:14	document 12:23 13:3,13, 14,16,22 19:14 20:21 22:3,6 24:21,24 25:3 32:13,14	employed 17:7
dated 26:8 40:22 41:7	develop 31:16	documents 8:18 14:8,11, 12,14 28:18 32:24 33:2,7 39:10 41:3,5	employee 8:5 27:10 35:14
dates 16:25 33:10	developing 31:16	DOD 12:14	employees 27:9,15,18,23 28:14,21 29:16 33:15,24 34:1, 13,18 37:8
day 42:21,24	difference 32:17		employer 21:12 37:9 43:11
days 13:7,8	differences 32:19,21 33:4		employers 37:18
DC 22:15,16			employment

8:20 25:1	24:17 26:2	filling	
employs	29:22 30:10	23:4	<hr/> G <hr/>
16:13	40:14 42:3	fine	gain
entity	fair	33:18 39:2	31:19 39:23
22:7	30:9 34:14	46:19	gained
everybody's	47:3	firm	31:17,21
36:18	false	23:12,17 24:3, 8	general
evident	47:4	fiscal	23:3 28:24
41:6	familiar	42:24	generally
exact	19:17 39:15,16	Florida	46:25
16:25 37:21	47:25	11:2,4 17:14	genre
EXAMINATION	Farmington	21:6 22:13,16	47:6
6:10	6:1	flowchart	gentleman
examined	fashion	9:5 10:15	35:18
6:9	43:3	form	geographically
excuse	February	19:17 20:22	10:24,25
7:23 13:9 22:7	11:15,16	33:1 41:13,17	give
43:5	federal	42:9	6:25 9:16
executive	6:15	formally	35:2,7 38:15
9:24 12:8 30:6	Federation	14:17	45:14 46:3
Exhibit	6:14 44:15	forms	giving
12:21 19:11,15	feel	41:14	7:6
25:23 26:1,2	29:1	formulated	good
32:9,12	figure	42:19	46:19 47:17
exhibits	45:19	forward	Gordon
32:15	file	30:10,13 36:22	23:3
existing	14:19 28:1	Friday	Government
44:4	32:20 33:10	13:12	21:17 41:8
expect	filed	full	graduated
10:7,10	14:21,25 28:2	12:16,17 15:14	15:4
expensive	filing	25:4	graduation
31:15	28:18	fully	15:6
extent	fill	25:11	Great
29:3,18 30:16	22:6,7 23:17	funny	15:20
40:2	25:4 32:6 41:6	38:9	Gregory
<hr/> F <hr/>	42:6	filled	23:3
fact	filled	20:10,23 21:7, 15 41:3	ground

guess 38:11 45:12	Hickey 6:17 9:10 13:23 24:12, 15,17 25:7,13 28:13,19 30:6, 10,12,19,20,23 31:7,18,22 32:2,5 44:13 47:15	14:18	
guessing 17:5 18:17		include 11:5,7 44:14	
guided 40:23		including 6:16	
guidelines 25:5		information 19:19 33:1 34:18,21 46:4	
<hr/>	high 15:4,6	interest 24:25 25:13 28:15,20 29:2	<hr/> J <hr/>
H	Hills 6:1	interference 47:7	Jerry 35:8,9,10
H-E-Y-M-A-N 35:13	history 8:21 15:3 16:19	interject 29:7	job 9:12,22 35:16
Hagan 20:5	hold 11:21,24	international 9:1 12:1,2,8, 13 28:23	June 11:22,23 12:19,20
hand 10:8	home 38:11	interrupt 10:23	jurisdiction 18:9
handing 10:1,3,21 11:11	honorable 15:19	involved 11:4 35:6,7, 21,24 36:2,6,7 38:14 43:7,21, 22,25 44:2,7, 12,17	<hr/> K <hr/>
handles 22:9	honors 15:14	involving 43:12	Kentucky 11:7 17:19,23 18:8,9,10 37:13 38:1,5, 10,12
handling 36:22	hundred 19:2	Iowa 11:3	kind 47:5
happy 34:11	<hr/> I <hr/>	Iraq 12:18	knew 30:19,20 36:13
hear 24:9	idea 9:16 25:18 46:6	Islands 11:5	knowledge 26:13,15 38:5 40:3,4
heard 9:19 46:15,18 47:7	identification 12:21 19:15 25:23 32:9	issues 46:22	<hr/> L <hr/>
held 11:11	identify 32:12	items 14:12	labor 28:7 39:16 40:5
hey 23:17 25:7 32:6 36:17 38:11	inadvertently 29:9		large 8:25 9:3 11:13,14 17:9 36:18 44:11
Heyman 35:8,10,11	inappropriate		Laura 20:5
			law 23:12

lawless 46:7,10,12	19:17 22:8,22, 23,24 23:4,18, 25 24:4,7,13, 18 25:9,21,25 28:1 32:6 41:17	40:13	6:1 22:13,17
lawsuit 6:16 46:23,24 47:1		Management 39:16 40:6	middle 11:4
lawyer 22:13	LM-30S 20:20	manner 20:23 21:16	military 15:8,11,15,16
lay 29:9	local 12:12,13 36:21	March 6:2 42:21	mind 44:20,24
Leadership 15:9	located 17:11,14	Maritas 6:13 43:12 44:14	minutes 47:19
leading 12:7	location 37:7,12,15,16	mark 19:11	mirrors 32:15
leasing 21:11	locations 17:17 37:4	marked 12:21 19:15 25:23 32:9,11	moment 28:24
length 38:17	long 8:8 11:9,11, 21,23 15:10,11 37:20,22 39:20 40:3	marriage 16:19	Monday 13:14,15,25 14:1,3
LEOS-PBA 6:14 44:15	longer 21:1	married 16:4 39:5	monitor 38:4
LEOSU 6:13 43:12 44:14	lot 43:18	match 33:7	months 42:25
light 47:4	Louisiana 11:3	matters 14:13 47:2	motion 14:19,22
lines 33:12		means 44:21 46:7	mouth 27:11
listed 12:23	<hr/> M <hr/>	meant 45:19 46:12	moving 30:10,12 36:22
listen 29:6 36:17	Mabel 20:1	meet 25:5	multiple 37:17
lists 19:19,25 20:4, 5	made 25:11,13 29:11 46:21	Melbourne 17:14	<hr/> N <hr/>
literature 44:1,3	make 20:9 29:8 31:14 46:9 47:13	member 12:3,5 24:22	NASA 12:14
LM 42:24	makes	members 18:13,25 21:22 29:16 36:9,17 37:5,19 43:7,8	NCO 15:8,9
LM-30		Michigan	needed 13:12 14:6 23:4,24 24:4 34:1,19

negotiate 9:22 10:8,10, 12,16	36:14 38:23 39:14 40:18 41:12,20 42:17 45:3,6 46:13, 17 47:18,23	18:5	Pan 12:9,10
negotiates 9:20,21		opinion 45:8,10	Paragon 18:20,24 19:4, 6,7,8 20:4,7, 24 21:5,19,22 22:1 25:2,9,17 26:16,19 27:7, 15,24 28:14, 15,20,25 31:4, 18,22 33:15,24 34:13,19 36:6, 8,9,11
Negotiating 9:18	<hr/> O <hr/>	opposed 26:3	Paragon/patronus 31:23
negotiation 18:4 35:7	O'QUINN 6:5,12 19:20 20:1	organization 9:2 10:18 16:16 18:23 25:11 36:5 44:24 45:7,16, 22	part 7:7 18:23 20:15 21:8,10, 12,13 32:16
negotiations 35:6 36:7,23, 25	object 30:16 34:2	organizational 9:4	part-time 31:17
net 46:2	objected 14:17	organizations 37:6	participating 36:25
NLRB 7:14,15	objection 14:22 23:6 36:12 38:21 40:8 45:1 46:11	organize 16:22	parties 6:16
nobody's 47:12	objections 14:21,25	originally 12:9 25:15	past 7:13
Nodding 7:11 37:11	occasion 43:6	outfit 44:3,5	Patronus 16:10,11,12,15 17:11,12,21 19:3 20:1,8,24 21:25 25:2,8, 14 26:15,21 27:7,15,24 28:14,15,20 29:22 30:5,7, 14 31:2,4 33:15,24 34:13,18,25 36:8,9,11
note 14:10	occasions 29:12	overbroad 14:17	paying 12:3,5
notice 12:24 13:17 14:10 20:20 36:15,16	occurred 32:1,2	owned 28:11 37:1	
number 9:1 14:12 31:15 33:11,12	offhand 43:15	owner 16:17,20 19:3	
numbers 32:20	officer 12:10	ownership 19:5,7 30:14	
Nunley 6:11,12 12:22 14:19,22 15:1 19:13,16 23:7, 10,21 25:24 27:3,5 29:6, 11,20 30:18, 22,25 32:10,25 33:5,8 34:8	officers 16:7	owns 25:7 36:19	
	offices 22:16	<hr/> P <hr/>	
	official 40:12	p.m. 6:3 47:21,22	
	operating 17:16,18,22	pages 19:12	

pecuniary 39:22	postings 43:11 44:13	prior 8:17 11:18,23 14:3 27:20,22 28:1,12,17 31:8 32:2 42:22 46:20	question 6:22 7:4,5,6, 7,8,9 16:18 18:22 19:2 20:12 23:13, 22,23 24:20 27:2,4 29:7 34:3,6 39:6,7, 24 41:10,16 45:4,18 46:13
pension 15:15,16	posts 43:14,17 44:8	privilege 29:10	questions 6:19 7:17 12:25 15:23 33:6 42:15
people 10:13 36:13	potential 24:24 30:13 36:17	privileged 29:17	<hr/> R <hr/>
percent 19:3	predicated 22:21	process 10:4,20 31:17	read 20:17 28:22
perfectly 29:12	preliminary 6:20	professionals 16:13,21 17:15,18,22 18:6	reading 19:1
period 32:18 42:7,8, 10	present 26:14 27:6,14	profit 31:14	reason 7:23 20:23 22:21 36:2,4
periodically 10:11	presently 34:24	projects 9:14,17 10:5	reasons 7:24
person 9:1,9 45:15	president 8:25 9:3,6,13, 15,21,23 10:2, 6,18 11:10,12, 13,18 12:12 13:23 17:8,9, 10 18:1,3 19:22 28:24 30:1 35:17,24 36:4,18,21 43:6 44:11	provide 36:15,16	recall 8:8,10,14 17:21 24:2 43:14,16
personally 36:16	President's 36:19	provider 21:9	receive 38:19 39:3
personnel 38:6	pretty 32:14	Puerto 11:5	received 13:15
Phillips 6:17 47:15	previous 26:1 32:15	purpose 22:19	receiving 15:15,16
place 14:16 23:5	previously 10:2	purposes 6:14 22:22	recent 20:20
plaintiff 7:20	primary 15:9	pursuing 8:12	recently 11:9 38:2
point 31:17 33:3 37:25 43:21	prime 21:17	put 27:10	
police 12:10 15:8	printed 33:1	<hr/> Q <hr/>	
Poorly 23:22		quash 14:20,23	
position 8:24 11:12,21, 24 30:14 35:19 43:5			

recess 47:21	Relax 39:3	requests 14:18	6:5 38:11
recognize 32:13	remember 7:22,24 24:1, 14 41:5	required 21:7 40:11,12, 16 42:21	Ricky 19:19
recollect 8:13	remind 29:14	requirement 22:23,25 28:9 41:1	Rico 11:5
record 14:16 27:13 30:4 47:22	rep 12:13 18:12	requirements 40:5	rival 45:14
recorded 46:21 47:13	rephrase 7:9 18:22 28:16	requires 6:24	Roth 22:12,13,22 24:8,10
reflect 41:14	report 9:9 43:22	response 7:6	rules 6:21
region 9:24 10:1,2,3, 4,8,21,22 11:7,11,19 17:8,10 18:1, 4,5,9,10 19:23 30:2 35:17,23 36:19 43:5,6, 20,21	reporter 7:1,16	restate 7:9 16:18	run 18:11 43:18
Regional 9:20 17:25	Reporting 39:16	retain 22:19,22	<hr/> S <hr/>
related 20:7 43:11 47:2	reports 42:24	retention 43:8 44:4	safe 26:10
relates 24:21,24,25	represent 26:18,19,22,24 27:10,17 33:14,24 34:12 37:5,8 38:6	retired 15:14	school 15:4,6
relationship 8:2 21:20,21, 23 30:5,7 31:2,3,4,7,12, 23,24 32:1,7 36:10 40:14	representation 18:7 26:23 27:22,23 28:13 34:1,19 39:22	returned 12:18	schools 15:7
relative 8:14 14:4,12 23:14 24:6 28:13 44:13 45:23 46:22 47:2,14	representative 12:1	return 43:3	securities 12:6
	represented 18:13,15 26:15 27:6,14 37:16, 19	review 8:17 12:25 20:19	security 12:9 16:7,13, 21 17:15,18,22 18:6
	representing 18:25 28:21	revenue 31:12	selling 21:10
	requested 13:13,17,21	returned 12:18	service 15:11 21:9
		reviewed 42:20 47:9	setting 7:16
		revolves 47:1	shop 16:22
		reword 26:18	show 12:23 19:10
		Rick	

25:20 32:11	speculation	statement	sworn
side	30:17 36:13	26:17 34:14,16	6:7
8:3	40:9	47:3	Systems
signature	spell	statements	16:11,12 17:13
20:11,13	35:11	46:21 47:13,14	18:20,24 19:3,
signed	SPFPA	states	6,8 20:1,4,7,8
26:5 42:8	6:16 8:6,11,21	11:4 19:22	21:19,22
similar	11:24 12:4,15	21:17 41:8	<hr/>
25:25	16:15,21	stating	T
simple	18:13,14,24	20:13 25:6	<hr/>
41:16	21:20,21,23	39:25	taking
simultaneously	24:22 25:1	step	35:18
18:12 28:21	26:15,18 27:6,	29:21	talk
sir	14,23 28:21	Steve	8:20 38:1
16:4 39:1	29:16 30:15	6:13	talking
41:16 44:20	31:24 33:14,	strike	26:22 29:4,15
sit	23,25 34:12,	7:23 30:11	talks
33:18 38:15	17,24 35:14	33:22	21:8
sitting	36:11,16 37:5,	subcontract	team
7:2	7,16,19 38:6	28:25 31:18	30:6
size	45:25 47:15	subcontracted	term
21:14	standpoint	21:5	46:15,18
slight	26:23 27:7	subcontractor	terms
32:19	stapler	20:24 21:16,25	10:14
smart	19:14	25:8,17	territory
27:8	Star	submission	23:13
someone's	15:18	20:11	testified
7:17	started	submitted	6:9
sought	17:21 21:4	14:24 41:7	testify
33:14 37:5,7	25:15 29:22	substance	6:7
source	31:5,8,11,12	8:15	testimony
46:4	Starting	substantial	9:19 31:8
speak	40:19	21:1,7,9,13	46:20
33:2	state	suggesting	thing
special	8:21 17:23	38:18	9:25
9:14,17 10:5	33:23 34:5	supposed	things
specifically	38:7	42:6	31:15 46:1
22:19 30:23	stated	surfing	Thursday
	28:23 30:4	46:1	6:2
	34:5 35:21		
	39:10 45:18		

time 12:16,17 13:6 14:18 17:8,25 18:3,11,21,24 20:17 21:25 25:19 26:11 28:9 32:5 38:4 45:21,23	35:23	28:4,6	43:6 44:11
timeline 25:12 26:4 37:21 41:7	transmitted 13:18	understood 7:2,5	violation 28:7
timelines 38:3	travel 13:13	union 18:7,25 21:19, 21,22 26:23 27:7,23 28:10, 13 39:13,22 40:12,15,16 44:3,4	Virgin 11:5
timely 43:3	truth 6:7,8	unionize 16:16	Virginia 11:3 36:21,24 37:3,10,15,16, 20,24 38:10
title 35:16	Tuesday 13:15	unions 12:7	VP 10:15 37:22
today 13:4,9,10 14:5,8 33:19 38:12 46:20	turned 42:21	unit 43:23	<hr/> W <hr/>
told 13:11 28:5 30:23 31:1	two-page 19:13	United 6:13 21:17 41:8 44:15	wading 35:22
Tom 6:12	type 7:16	unsure 31:20	waive 29:9
tortious 47:6	typed 33:1	unusual 24:16	website 11:6
touch 15:2	<hr/> U <hr/>	vague 17:2 34:2 47:3	Wednesday 13:12
trade 15:7	Um-hmm 11:17 17:13 31:6	<hr/> V <hr/>	week 13:12 14:1,3 42:19
training 10:4	unaware 22:23 28:9 41:1	vaguely 37:7 39:18	Wells 6:13
transaction 38:18	uncertain 37:25 38:3	vendor 21:9	West 11:2 36:21,24 37:3,10,14,16, 20,23 38:10
transcripts 28:23	underneath 10:14	Vice 8:25 9:3,12, 20,23 10:2 11:10,12,13,18 17:8,9,10 18:1,3 19:22 30:1 35:17,23 36:4,18,19	wife 16:6,17,20 18:4,12,14,23 19:2,5 20:2 21:4 24:25 25:7 28:10,14, 25 29:22 30:7, 11 31:3,11 32:7 34:22
transition 10:1,3 12:7	understand 7:7 19:1 21:18 24:19 26:20 27:1 38:17 39:24 40:23		
	understandable 7:10		
	understanding 16:6 25:3		

36:5,19,23
37:1,4,23
38:9,10,13
39:11,20,21
40:1

wife's

25:12,13 28:19
30:5,14 31:1
36:10 37:8

win

18:8

winning

40:2

wins

38:9,10

won

18:14 36:23
37:1,4 38:5,
12,13

word

44:21 45:21
46:7

worded

23:22

words

6:25 27:10

work

8:21 9:14

worked

12:6,9 19:8
20:9

working

10:5 44:20
45:2,5 46:6

written

46:21 47:13

Y

year

11:15 17:1
37:24 41:11
42:4,9,22,25

year's

20:22

years

8:9 15:13,14
17:2 22:6,8
27:17 37:17
43:19

yesterday

42:23