

COMPOSITE EXHIBIT “A”

MILESTONE I REPORTING COMPANY

407.423.9900

Fax 407.841.2779

Toll Free 855-MYDEPOS

TOMORROW'S TECHNOLOGY TODAY



1 EXAMINATION UNDER OATH OF D'JUAN HARRIS

2

3

4

5

6

7

8

9

10 DATE: JANUARY 6, 2025

11 REPORTER: CHALEN CAFIERO

12

13

14

15

16

17

18

19

20

21

22

23

24

25

ORIGINAL

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

APPEARANCES

ON BEHALF OF CHARLOTTE COUNTY ADMINISTRATION:

Lindsay N. Greene, Esquire

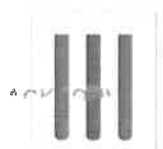
DSK Law

332 North Magnolia Avenue

Orlando, Florida 32801

Telephone No.: (407) 992-3536

E-mail: lgreene@dsklawgroup.com



MILESTONE | REPORTING COMPANY
TOMORROW'S TECHNOLOGY TODAY

CORPORATE ORLANDO, FL 32801
JACKSONVILLE, FL 32256
TAMPA, FL 33602

407.423.9900

www.MILESTONEReporting.com

Toll Free 855-MYDEPOS

1	INDEX	
2		Page
3	PROCEEDINGS	5
4	DIRECT EXAMINATION BY MS. GREENE	5
5		
6		
7		
8		
9		
10		
11		
12		
13		
14		
15		
16		
17		
18		
19		
20		
21		
22		
23		
24		
25		



MILESTONE | REPORTING COMPANY
TOMORROW'S TECHNOLOGY TODAY

CORPORATE ORLANDO, FL 32801
JACKSONVILLE, FL 32256
TAMPA, FL 33602

407.423.9900

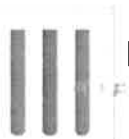
www.MILESTONEReporting.com

Toll Free 855-MYDEPOS

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

STIPULATION

The Examination Under Oath of D'JUAN HARRIS was taken at CHARLOTTE COUNTY ADMINISTRATION, 18500 MURDOCK CIRCLE, PORT CHARLOTTE, FLORIDA 33948 on MONDAY the 6th day of JANUARY 2025 at 11:02 a.m. (ET); said Examination Under Oath was taken pursuant to the AGREED UPON RULES OF THE PRESENT PARTIES. It is agreed that CHALEN CAFIERO, being a Notary Public and Court Reporter for the State of FLORIDA, may swear the witness.



MILESTONE | REPORTING COMPANY
TOMORROW'S TECHNOLOGY TODAY

CORPORATE ORLANDO, FL 32801
JACKSONVILLE, FL 32256
TAMPA, FL 33602

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

PROCEEDINGS

THE REPORTER: We are now on the record. Mr. Harris, whenever you have a chance, could you raise your right hand for me?

THE WITNESS: All right.

THE REPORTER: Do you solemnly swear or affirm that the testimony you're about to give will be the truth, the whole truth, and nothing but the truth?

THE WITNESS: Yes.

THE REPORTER: All right. We may start.

DIRECT EXAMINATION

BY MS. GREENE:

Q. Sir, if you'll just state your full name.

A. D'Juan Lael Harris.

Q. And spell D'Juan for me?

A. D, apostrophe, capital J, U-A-N.

Q. Okay. And you said that's Harris?

A. Yes.

Q. Harris. Okay.

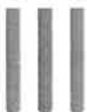
A. H-A-R-R-I-S.

Q. Okay. Mr. Harris, my name is Lindsay Greene.

A. All right.

Q. And I've been retained by Charlotte County to conduct an investigation --

A. Okay.



MILESTONE | REPORTING COMPANY
TOMORROW'S TECHNOLOGY TODAY

407.423.9900

www.MILESTONEREPORTING.com

CORPORATE ORLANDO, FL 32801
JACKSONVILLE, FL 32256
TAMPA, FL 33602

Toll Free 855-MYDEPOS

1 Q. -- concerning an interaction that I understand
2 you had with Stephen Deutsch?

3 A. Yep.

4 Q. And that's the purview of the investigation.

5 A. Uh-huh.

6 Q. I am a neutral person.

7 A. Okay.

8 Q. I don't know you. I don't know any of the
9 witnesses --

10 A. Uh-huh.

11 Q. -- and so I call balls and strikes.

12 A. Okay.

13 Q. That's all I do.

14 A. Yeah. Okay.

15 Q. And so I'm going to ask you questions about
16 this interaction.

17 A. Uh-huh.

18 Q. I'm assuming you know what I'm referring to.

19 A. Of course. Of course.

20 Q. Okay. And then I will issue a report.

21 A. Okay.

22 Q. Okay? I'm with DSK Law.

23 A. Okay.

24 Q. And so I'm not the county attorney. Again,
25 I'm not in otherwise -- other than being retained --



MILESTONE | REPORTING COMPANY

TOMORROW'S TECHNOLOGY TODAY

407.423.9900

www.MILESTONEREPORTING.com

CORPORATE: ORLANDO, FL 32801
JACKSONVILLE, FL 32256
TAMPA, FL 33602

Toll Free 855-MYDEPOS

1 A. Okay.

2 Q. -- not affiliated --

3 A. Okay.

4 Q. -- with Charlotte County.

5 A. Okay.

6 Q. Okay. And it's my neutrality and the fact
7 that I don't have an interest or relationship with all
8 the parties, which is why entities --

9 A. Uh-huh.

10 Q. -- bring me in for this purpose.

11 A. Good. Good.

12 Q. Okay?

13 A. Good.

14 Q. So start by telling me what's your job title?

15 A. My job title is MPO executive director.

16 Q. Okay. And what does MPO stand for?

17 A. Metropolitan Planning Organization.

18 Q. And how long have you served in that position?

19 A. This position? Three years and about going on
20 three months.

21 Q. Okay. And how long total have you been
22 employed by Charlotte County?

23 A. Three years, three months.

24 Q. Okay. Where were you employed prior?

25 A. I was with FDOT for eight years prior.



MILESTONE | REPORTING COMPANY

TOMORROW'S TECHNOLOGY TODAY

407.423.9900

www.MILESTONEREPORTING.com

CORPORATE ORLANDO, FL 32801
JACKSONVILLE, FL 32256
TAMPA, FL 33602

Toll Free 855-MYDEPOS

1 Q. And what was your job title with FDOT?

2 A. I was a design project manager, and I was also
3 an intergovernmental liaison.

4 Q. Tell me what one does as a design project
5 manager?

6 A. Basically, the roadway transportation
7 projects. We get -- we -- we work with the engineers to
8 develop the design plans for transportation projects.
9 It's pretty much cut and dry what we do.

10 Q. Okay.

11 A. So --

12 MS. GREENE: And before we get started, did you
13 place him under oath? I didn't hear you.

14 THE REPORTER: I did. Yes.

15 MS. GREENE: You did? Okay. I just wanted to
16 make sure. Okay.

17 BY MS. GREENE:

18 Q. Who is your -- do you have a direct
19 supervisor?

20 A. Now?

21 Q. Yes.

22 A. So Stephen Deutsch would be one of my -- one
23 of my bosses. We have a commissioner, Mayor Lux,
24 Commissioner Constance, T.J. Thornberry, and who was the
25 -- Joseph Tiseo. So I report to five MPO board members.



MILESTONE | REPORTING COMPANY

TOMORROW'S TECHNOLOGY TODAY

407.423.9900

www.MILESTONEREPORTING.com

CORPORATE ORLANDO, FL 32801
JACKSONVILLE, FL 32256
TAMPA, FL 33602

Toll Free 855-MYDEPOS

1 Those are my supervisors.

2 Q. So the --

3 A. He was -- he was --

4 Q. -- the members of the commission and the
5 mayor --

6 A. The member -- the member of the board, MPO
7 board. The MPO board is a subcommittee of the -- of the
8 county commission. So there are five elected officials
9 within the county that are chosen for that MPO board.

10 Q. Okay.

11 A. And Stephen Deutsch is one of those members of
12 the MPO board.

13 Q. Okay.

14 A. But he would be one of my supervisors.

15 Q. Okay.

16 A. Direct reports.

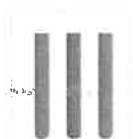
17 Q. Now, when we initially started talking, I
18 referred to an incident that occurred between yourself
19 and Mr. Deutsch. And you seemed to nod your head like
20 you knew what I was referring to.

21 A. Of course. Of course.

22 Q. Is there more than one or is there the one
23 incident?

24 A. Just one incident.

25 Q. Okay. Tell me what happened. First of all,



MILESTONE | REPORTING COMPANY

TOMORROW'S TECHNOLOGY TODAY

407.423.9900

www.MILESTONEREPORTING.com

CORPORATE ORLANDO, FL 32801
JACKSONVILLE, FL 32256
TAMPA, FL 33602

Toll Free 855-MYDEPOS

1 what -- approximately what day was this?

2 A. This was -- I can give you the actual exact
3 date. December the 12th.

4 Q. And just for the record, I know you were
5 looking at your cell phone to determine the date. Was
6 it a calendared event?

7 A. Yes. Yes. Yes.

8 Q. Okay.

9 A. So --

10 Q. What was the event that was calendared on
11 December 12th?

12 A. So before every MPO board meeting, it is --
13 it's my role as MPO director to brief all the board
14 members on what's going to come up in that board
15 meeting. I was there to -- to report on that briefing,
16 to brief him on what was coming up.

17 Q. And so this meeting was just between the two
18 of you? Yes. And was this -- where did the meeting
19 take place?

20 A. In his office.

21 Q. And his office, is it in the administration
22 building?

23 A. Executive suite, fifth floor --

24 Q. Fifth floor?

25 A. Yeah. Fifth floor of the same building.



MILESTONE | REPORTING COMPANY

TOMORROW'S TECHNOLOGY TODAY

407.423.9900

www.MILESTONEREPORTING.com

CORPORATE ORLANDO, FL 32801
JACKSONVILLE, FL 32256
TAMPA, FL 33602

Toll Free 855-MYDEPOS

1 Q. Okay. And approximately what time did the
2 meeting start?

3 A. 11:00.

4 Q. Okay. So 11:00 a.m. --

5 A. Uh-huh.

6 Q. -- and was the door open while you two were
7 talking or was it closed?

8 A. It was open.

9 Q. Now, if you can describe for me just the
10 layout. So when you go into Mr. Deutsch's office, is
11 there anyone who sits outside his office? Does he have
12 an assistant? A secretary?

13 A. He has an assistant that sits right outside of
14 his office.

15 Q. Okay.

16 A. She --

17 Q. And what's his assistant's name?

18 A. His assistant's name is Claudia Mayo.

19 Q. So walk me through that meeting. You go into
20 his office.

21 A. Uh-huh.

22 Q. Tell me what is said from beginning to the
23 time that that interaction ended.

24 A. Okay. So the purpose of the meeting is to
25 basically brief him on what's coming up in the MPO board



MILESTONE | REPORTING COMPANY

EST. 1985
TOMORROW'S TECHNOLOGY TODAY

407.423.9900

www.MILESTONEREPORTING.com

CORPORATE ORLANDO, FL 32801
JACKSONVILLE, FL 32256
TAMPA, FL 33602

Toll Free 855-MYDEPOS

1 meeting. Any -- any --

2 Q. Had you done these meetings previously?

3 A. I've done tons of these meetings, tons of
4 them. And I've never -- it -- the meetings with him are
5 always a little -- little, kind of, awkward because he
6 always wants to steer the conversation away from, you
7 know, the MPO board briefing to discussions on politics.
8 And, you know, I -- I don't shy away from -- from any
9 discussion. And so I -- I -- I -- sometimes I indulge,
10 sometimes I'll redirect and get him back on track. For
11 this one instance, I mean, he was in kind of a weird
12 mood, and it was after the election.

13 Q. After what election?

14 A. After -- after the presidential election. And
15 he goes into a weird diatribe about how we dodged a
16 bullet, you know, and how we were going to be better
17 off. And I was like, no. No. I -- I disagree. I
18 respectfully disagreed. And I said, I would never give
19 my support to anyone that placates or panders to
20 suspected white supremacists, I mean. And he counted
21 with that by going on this other weird diatribe about
22 how he knows Black history and all this other weird
23 stuff. And I was like, what are you -- where are you
24 going? What are you talking about? And then the
25 conversation --



MILESTONE | REPORTING COMPANY

TOMORROW'S TECHNOLOGY TODAY

407.423.9900

www.MILESTONEREPORTING.com

CORPORATE ORLANDO, FL 32801
JACKSONVILLE, FL 32256
TAMPA, FL 33602

Toll Free 855-MYDEPOS

1 Q. Can you just do me a favor?

2 A. Okay. Go ahead. Go ahead.

3 Q. Because --

4 A. I'm probably saying too much.

5 Q. No. You're --

6 A. Okay.

7 Q. -- you're not saying --

8 A. Okay.

9 Q. -- you're not saying too much.

10 A. Go ahead.

11 Q. I want you to tell me everything.

12 A. Okay.

13 Q. But when you say, like, "weird stuff," I don't

14 know what that means. So if you can try and remember as

15 much as you can about what was said. So you go into his

16 office and it's for the MPO briefing. How soon after

17 you get into the office is there a discussion about the

18 presidential election?

19 A. Probably about 15 to 20 minutes in.

20 Q. Okay. So what did you two talk about prior to

21 getting into --

22 A. Prior to that, we -- we discussed the

23 briefing. I gave him the action items that were coming

24 up on the MPO board meeting and what would be expected

25 from him at that MPO board meeting. And we weren't



MILESTONE | REPORTING COMPANY

TOMORROW'S TECHNOLOGY TODAY

407.423.9900

www.MILESTONEREPORTING.com

CORPORATE ORLANDO, FL 32801
JACKSONVILLE, FL 32256
TAMPA, FL 33602

Toll Free 855-MYDEPOS

1 really finished, but he -- he was itching to -- I -- and
2 -- I don't want to put my opinion in this, but it felt
3 like he was gloating, you know, about the election.

4 Q. And what was it that gave you the impression
5 that he was gloating?

6 A. Because he just kept, you know, going on about
7 how we dodged a bullet or whatever. And we -- like I
8 said before, we've had past political discussions
9 because I don't sit on either side of the aisle. I just
10 respect decency and moral -- moral -- morals. And
11 that's -- that's pretty much it. But for some reason,
12 he -- he wanted to talk to politics, he wanted to get
13 into demographics, and he got this --

14 Q. When you said he got into demographics, what
15 does that mean?

16 A. He was discussing -- he got into a
17 conversation of what they would have -- what a suspected
18 white supremacist would have referred to me back in the
19 day. And he even went so far as to kind of allude to the
20 fact that democrats would call me that. That -- I was
21 like, I'm not -- I'm not on either -- I'm not on either
22 team anyway. So I don't know what that has to do with
23 anything. And it had nothing to do with the briefing
24 and I just didn't -- I -- I didn't get to --

25 Q. Okay. So when you say what white supremacists



MILESTONE | REPORTING COMPANY

TOMORROW'S TECHNOLOGY TODAY

407.423.9900

www.MILESTONEREPORTING.com

CORPORATE ORLANDO, FL 32801
JACKSONVILLE, FL 32256
TAMPA, FL 33602

Toll Free 855-MYDEPOS

1 would have called you --

2 A. Uh-huh.

3 Q. -- and that democrats probably would have also
4 called you that.

5 A. Uh-huh.

6 Q. What was that?

7 A. Called me a nigger.

8 Q. Okay.

9 A. He said the word.

10 Q. Did he --

11 A. He said the word.

12 Q. -- say the word?

13 A. He said the word.

14 Q. Okay.

15 A. He said the word. I did not appreciate him
16 saying the word. I don't want anybody with authority
17 saying that word to me, number one. And number two,
18 does he make a point of telling everybody in there
19 that's -- not everybody that comes through his office is
20 a minority, but you know, if someone would have called
21 him -- I -- I don't know. It was just a weird -- weird
22 conversation.

23 Q. So let me work my way through this.

24 A. Okay. All right.

25 Q. So you go into Mr. Deutsch's office.



MILESTONE | REPORTING COMPANY
TOMORROW'S TECHNOLOGY TODAY

CORPORATE ORLANDO, FL 32801
JACKSONVILLE, FL 32256
TAMPA, FL 33602

1 A. Uh-huh.

2 Q. First 15 minutes, you say that you do get to
3 go into details with regard to the MPO briefing.

4 A. Uh-huh.

5 Q. Then after those 15 minutes, Mr. Deutsch
6 begins making comments about "we dodged a bullet."

7 A. Uh-huh.

8 Q. Am I correct?

9 A. Yeah. To -- to that nature. Yeah.

10 Q. To that nature.

11 A. Yeah. Yeah.

12 Q. Did he actually use the phrase, "dodged a
13 bullet"?

14 A. No. He didn't -- he didn't say it that way.

15 Q. Okay.

16 A. He didn't say it that way.

17 Q. What do you remember him saying?

18 A. I remember him saying detrimental things about
19 the -- the vice president and, you know, her being the
20 president --

21 Q. Like what --

22 A. Just -- just that she wasn't going to be the
23 right kind of leader and all this kind of stuff. It --
24 it -- it -- it -- there was nothing -- I wouldn't say
25 malicious, but these were just his -- his -- his



MILESTONE | REPORTING COMPANY

TOMORROW'S TECHNOLOGY TODAY

407.423.9900

www.MILESTONEREPORTING.com

CORPORATE ORLANDO, FL 32801
JACKSONVILLE, FL 32256
TAMPA, FL 33602

Toll Free 855-MYDEPOS

1 opinionated things about her.

2 Q. Okay.

3 A. But so --

4 Q. So his descriptions of Vice President Kamala
5 Harris, that part, you didn't take issue with, with
6 regard to him expressing his opinion about --

7 A. No. That's his opinion. That's his opinion.

8 Q. Okay.

9 A. Yeah. All day.

10 Q. And you didn't find anything derogatory --

11 A. Nothing with that, no.

12 Q. -- about --

13 A. No.

14 Q. -- Mr. Deutsch's descriptions --

15 A. No.

16 Q. -- of --

17 A. No.

18 Q. -- Vice President Kamala Harris?

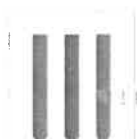
19 A. No. No.

20 Q. Okay.

21 A. I will repeat. I did not appreciate him
22 saying the -- saying the N-word. Yes.

23 Q. So -- but I'm just trying to walk us up to at
24 what point --

25 A. Yes. That's --



MILESTONE | REPORTING COMPANY

TOMORROW'S TECHNOLOGY TODAY

407.423.9900

www.MILESTONEREPORTING.com

CORPORATE ORLANDO, FL 32801
JACKSONVILLE, FL 32256
TAMPA, FL 33602

Toll Free 855-MYDEPOS

1 Q. So after Mr. Deutsch gave his description or
2 his view as to Vice President Kamala Harris not being
3 the best fit for the country --

4 A. Uh-huh. Uh-huh.

5 Q. -- is that a good description?

6 A. That's a good description.

7 Q. Okay.

8 A. That's a good description.

9 Q. At what point did the conversation get to a
10 point where you felt uncomfortable?

11 A. It felt uncomfortable when he -- and here's
12 the context that he used the N-word. He basically said
13 when he was a kid and this -- this alludes to that weird
14 stuff. When he was a kid, one of his friend's moms
15 would call him in the house by that word. And then he
16 said it. Like, you didn't -- like, what are you doing?
17 You -- and when he said it, I -- I reacted. It's --
18 it's a trigger for me. And I said, you will not say
19 that fucking word, you know, to me in my presence. And
20 you know, he took offense to that. And he started
21 telling me what I wouldn't say in his office. And then
22 we -- we went back and forth. His assistant kind of
23 overheard the conversation getting a little heated. She
24 came in there to try to, you know, straighten things
25 out. This guy still was pushing on, still pushing on



MILESTONE | REPORTING COMPANY

TOMORROW'S TECHNOLOGY TODAY

407.423.9900

www.MILESTONEREPORTING.com

CORPORATE ORLANDO, FL 32801
JACKSONVILLE, FL 32256
TAMPA, FL 33602

Toll Free 855-MYDEPOS

1 trying to make his point. And I'm trying to leave his
2 office. I'm trying to just excuse myself. And he's
3 still pushing on. So, I said, you know what? I stormed
4 out of the office, dropped off a package to another
5 commissioner, and left it at that. I went -- I thought
6 about it, talked to my wife, and I called the county
7 attorney maybe about three or four hours later, so --

8 Q. And did you speak with the county attorney?

9 A. I did, yes.

10 Q. And just for the record, who did you speak
11 with?

12 A. Janette Knowlton.

13 Q. Okay. So when we initially spoke -- and I
14 just want to make sure I understand what transpired.

15 A. Uh-huh.

16 Q. You come in and do the MPO briefing.

17 A. Uh-huh.

18 Q. Then Mr. Deutsch begins to make comments about
19 the presidential election --

20 A. Uh-huh.

21 Q. -- correct?

22 A. Uh-huh.

23 Q. He then says -- makes the comment about Vice
24 President Kamala Harris not being the right fit --

25 A. Uh-huh.



MILESTONE | REPORTING COMPANY

TOMORROW'S TECHNOLOGY TODAY

407.423.9900

www.MILESTONEREPORTING.com

CORPORATE ORLANDO, FL 32801
JACKSONVILLE, FL 32256
TAMPA, FL 33602

Toll Free 855-MYDEPOS

1 Q. -- for the country, something like that. And
2 just say yes, because we can't transcribe uh-huh.

3 A. Oh, I got you. Sorry. My bad. Yes.

4 Q. Okay.

5 A. Yes.

6 Q. And then you said, at some point, Mr. Deutsch
7 made comments as to his preference for the president-
8 elect, Donald Trump --

9 A. Right.

10 Q. -- correct?

11 A. Right.

12 Q. And then you stated your disagreement --

13 A. Right.

14 Q. -- of that --

15 A. Right. Right.

16 Q. -- his opinion. And I think you said you made
17 the comment, you didn't think anyone who panders to --

18 A. Suspected --

19 Q. -- white --

20 A. -- suspected.

21 Q. -- suspected --

22 A. Suspected. Yeah.

23 Q. -- white supremacists should get support.

24 A. Right. That should be held up the way he was
25 holding him up.



MILESTONE | REPORTING COMPANY

TOMORROW'S TECHNOLOGY TODAY

407.423.9900

www.MILESTONEREPORTING.com

CORPORATE ORLANDO, FL 32801
JACKSONVILLE, FL 32256
TAMPA, FL 33602

Toll Free 855-MYDEPOS

1 Q. And so was it then that we get into the
2 comment of the use of the word, and I just got to say
3 it, the word "nigger." Is that when that comment comes
4 about?

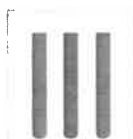
5 A. It was after that comment. It was after -- it
6 was after the -- the political discussion, and it was
7 after -- it was after I said --

8 Q. What was the lead in though?

9 A. I don't -- I don't understand. That's why I
10 just thought -- I -- I thought the whole discussion was
11 odd where he took it, you know? And that's why --
12 that's why I don't repeat. I didn't -- I don't
13 appreciate somebody of authorities saying that word. And
14 is he -- there are other minorities directors in -- in
15 the -- in -- in the county. Does he tell every minority
16 director what people would have called them back in the
17 day? And -- yeah. But I don't -- I don't think he
18 does.

19 Q. So walk me through. So the -- did the
20 conversation or his comments start with Mr. Deutsch
21 saying that when he was a child, his friend's mother
22 called him into her home and called him a nigger?

23 A. No. Not -- didn't call him. They called the
24 -- called the son. I guess -- I -- I'm guessing the
25 little boy must have been Black. And he felt that the



MILESTONE | REPORTING COMPANY

TOMORROW'S TECHNOLOGY TODAY

407.423.9900

www.MILESTONEREPORTING.com

CORPORATE ORLANDO, FL 32801
JACKSONVILLE, FL 32256
TAMPA, FL 33602

Toll Free 855-MYDEPOS

1 mother called him in by that name as a term of
2 endearment. And I said --

3 Q. The boy's mother?

4 A. The boy's mother. Yes. Yes.

5 Q. And he thought that the mother was calling her
6 son a nigger as a term of endearment?

7 A. That was his -- that was his explanation of
8 it. And that's why -- it's -- it's -- that's kind of
9 some -- he felt it was okay to say it because of that.
10 I was like, yeah. No. It's not okay to say that.
11 You're -- you're not -- you're not Black. I mean,
12 you're -- you're -- anyway. I just --

13 Q. So what -- so was that the only time that Mr.
14 Deutsch used the term "nigger" during your
15 conversation --

16 A. Yes. Yes.

17 Q. -- was to say how his friend's mother, when he
18 was a child, called the little boy nigger as a term of
19 endearment?

20 A. Uh-huh.

21 Q. Yes?

22 A. Uh-huh.

23 Q. Yes?

24 A. Yes.

25 Q. Okay.



MILESTONE | REPORTING COMPANY
TOMORROW'S TECHNOLOGY TODAY

407.423.9900

www.MILESTONEREPORTING.com

CORPORATE ORLANDO, FL 32801
JACKSONVILLE, FL 32256
TAMPA, FL 33602

Toll Free 855-MYDEPOS

1 A. Yes. Yes. Yes. Yes. Yes. Yes.

2 Q. Okay. And that's when you responded "not to
3 use that fucking word around me"?

4 A. Yes. Yes.

5 Q. And then how did he respond to that? How did
6 Mr. Deutsch respond to that?

7 A. He seemed a little -- he seemed a little
8 jarred that I -- that I cursed, but he got -- I got my
9 point across. I got my point across. And he was --
10 after he saw that I reacted to him using the N-word, the
11 full N- word. He basically kind of held his head down a
12 little bit. And then his -- his -- his assistant came
13 into the office to kind of try to break us up and get us
14 out of there.

15 Q. But you said he held it -- so at what --
16 because you said that Ms. Mayo came in the room because
17 it escalated.

18 A. It was escalating, yes.

19 Q. So at what point did it escalate? After he
20 held his head, put his head down, what happened? In
21 what way was it escalating?

22 A. It was -- the -- we were getting louder. We
23 were getting louder. The conversation was getting
24 louder and -- and we were still --

25 Q. So after you said, "don't fucking say that" --



1 A. Yeah.

2 Q. -- what was his response?

3 A. He -- he seemed -- he just seemed off balance.

4 And you know, I guess -- I guess me cursing kind of --

5 he just didn't really say much. He just kind of

6 looked --

7 Q. But you said --

8 A. -- kind of looked --

9 Q. -- that it was getting louder. Was he still
10 talking to you?

11 A. He was trying to explain. He was going into
12 this whole explanation. And I just -- nothing was --

13 Q. What was he explaining?

14 A. He was trying to say it was a term of
15 endearment. He was trying to say -- he -- he gave a
16 halfhearted apology that was -- didn't -- wasn't even an
17 apology. It was basically, well, I'm sorry you
18 responded that way or something. It was just weird. And
19 after that, I left. I just stormed out after that.

20 Q. So when Ms. Mayo came into the conference
21 room, what did Ms. Mayo say? Or did she say anything?

22 A. She kind of shook her head a little bit and
23 she was -- she was saying, come on. Let's -- come on
24 out of here. And then I was -- I was leaving. After he
25 said the N-word, I was leaving. I said, this -- this



MILESTONE | REPORTING COMPANY

TOMORROW'S TECHNOLOGY TODAY

407.423.9900

www.MILESTONEREPORTING.com

CORPORATE ORLANDO, FL 32801
JACKSONVILLE, FL 32256
TAMPA, FL 33602

Toll Free 855-MYDEPOS

1 briefing is over. I was leaving. And, you know, for
2 some reason, he was still egging me on. And this fool
3 actually said, you know, he put his fist up, fight,
4 fight. You know, the -- yeah. So --

5 Q. When you say, egging you on, what do you mean
6 egging you on?

7 A. He egged me on. He's such a republican Homer
8 that he -- I shouldn't have said -- but he's -- he was
9 still egging me on. He said, keep fighting, fighting,
10 fighting. After Ms. Mayo came in and said, come on,
11 D'Juan. We -- we'll be -- we'll go and -- you know, she
12 was trying to escort me on out. And he was still
13 trying. You're doing good. You're doing good. So he
14 -- he enjoyed the back and forth debate, even though we
15 were getting louder. And even though the conversation
16 was inappropriate, you know. It was definitely
17 inappropriate for what -- what I was there for, the
18 purpose that I was there.

19 Q. And you say he raised his fist and said,
20 fight --

21 A. Raised his fist and kept saying --

22 Q. Chanting?

23 A. -- he said, fight, fight. You know what, like
24 after Trump got shot, he stood up and said fight. So he
25 was doing that little dumb thing, so --



MILESTONE | REPORTING COMPANY
TOMORROW'S TECHNOLOGY TODAY

www.MILESTONEREPORTING.com

CORPORATE ORLANDO, FL 32801
JACKSONVILLE, FL 32256
TAMPA, FL 33602

Toll Free 855-MYDEPOS

1 Q. Okay.

2 A. Yeah.

3 Q. And is that how the interaction ended?

4 A. Pretty much, pretty much, pretty much.

5 Q. Did you have any interactions --

6 A. No.

7 Q. -- with Mr. Deutsch after?

8 A. No. No. I send him correspondence from FDOT
9 and information along, you know, in group e-mails, but
10 no one-on-one interaction at all.

11 Q. Have you spoken to Ms. Mayo about the incident
12 since?

13 A. I do not recall speaking to her again. I -- I
14 know I spoke with Janette Knowlton several times about
15 it. I don't -- I don't recall speaking to Claudia Mayo
16 again about it.

17 Q. Okay.

18 A. I don't recall.

19 Q. And the previous conversations that you had
20 with Mr. Deutsch, you said that there had been some
21 other interactions when you were going to his office.
22 Was it always for the MPO briefing?

23 A. It was always for the MPO briefing. Right.

24 Q. And you said sometimes those conversations --

25 A. Oh, and -- and also my -- my yearly appraisal.



MILESTONE | REPORTING COMPANY

TOMORROW'S TECHNOLOGY TODAY

407.423.9900

www.MILESTONEREPORTING.com

CORPORATE ORLANDO, FL 32801

JACKSONVILLE, FL 32256

TAMPA, FL 33602

Toll Free 855-MYDEPOS

1 So a performance review.

2 Q. Okay. How many performance reviews have you
3 received where Mr. Deutsch has participated and given
4 input?

5 A. Three. Yeah.

6 Q. What scores have you received from him?

7 A. Above average.

8 Q. And so you said during prior MPO briefings
9 that you had with Mr. Deutsch or during your evaluation
10 meetings, you said sometimes those conversations would
11 turn on a political bend?

12 A. They'd turn on -- yeah. Typically.

13 Q. Was it you who would initiate --

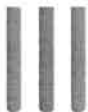
14 A. No.

15 Q. -- political conversations?

16 A. No, no, no, no. Never. Never. No.

17 Q. And --

18 A. I always came in strictly business. And every
19 MPO board briefing I do, I -- I have like a -- I have
20 like a notes sheet and I go down those notes and I try
21 to hit every point. And it is -- the briefings are only
22 30 minutes. So I'm trying to hit them, boom, boom,
23 boom, boom. And -- and just in case they have any
24 questions, sometimes the briefings go longer than 30
25 minutes. But it's not a whole lot of time I have with



MILESTONE | REPORTING COMPANY

TOMORROW'S TECHNOLOGY TODAY

407.423.9900

www.MILESTONEREPORTING.com

CORPORATE ORLANDO, FL 32801
JACKSONVILLE, FL 32256
TAMPA, FL 33602

Toll Free 855-MYDEPOS

1 them, so I'm trying to be as efficient as I can within
2 the time I have with them. So typically he -- typically
3 he always likes to veer off the conversation. And
4 sometimes it would be pleasant conversations about
5 things like sports or just whatever it is, you know. But
6 for some reason, you know, he was in a -- a mood and to
7 discuss politics that day.

8 Q. And what are the other types of political
9 conversations that Mr. Deutsch has initiated with you?

10 A. They would be historical in context. You
11 know, he -- go to his office, you'll see he's got a
12 whole museum of republican artifacts on the wall. There
13 -- there are things everywhere strewn about the office.
14 So he would just talk about his heydays and, you know,
15 being in the Republican party and as a part of the -- I
16 want to say he was in Rhode Island or somewhere as a
17 senator or something like that for his -- he's a career
18 politician. So he would discuss things about his
19 heyday, which is harmless to me. I mean, I don't care.

20 Q. So none of those prior conversations, did you
21 find offensive --

22 A. No.

23 Q. -- or concerning --

24 A. No. No.

25 Q. -- or take issues with in any manner?



MILESTONE | REPORTING COMPANY
TOMORROW'S TECHNOLOGY TODAY

407.423.9900

www.MILESTONEREPORTING.com

CORPORATE ORLANDO, FL 32801
JACKSONVILLE, FL 32256
TAMPA, FL 33602

Toll Free 855-MYDEPOS

1 A. No. No. No.

2 Q. It's this one conversation that you had on --

3 A. No.

4 Q. -- December 12th?

5 A. No. Yes. Yes. Yes. Yes.

6 Q. Okay.

7 A. Yes.

8 Q. And there have been no interactions since

9 December 12th --

10 A. No.

11 Q. -- that has caused you concern or issue --

12 A. No.

13 Q. -- or -- okay. Okay. Is there anything else

14 that we have not covered that you think may be important

15 to this investigation?

16 A. Nothing I can think of. Do I get a copy of

17 the report? And will he get interviewed as well? Or

18 how does this work?

19 Q. I'm going to issue my report to the county

20 representative.

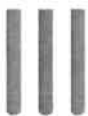
21 A. Okay.

22 Q. And so you -- you'll get anything that you

23 want from the county.

24 A. Oh, okay.

25 Q. Okay?



MILESTONE | REPORTING COMPANY

TOMORROW'S TECHNOLOGY TODAY

407.423.9900

www.MILESTONEREPORTING.com

CORPORATE ORLANDO, FL 32801
JACKSONVILLE, FL 32256
TAMPA, FL 33602

Toll Free 855-MYDEPOS

1 A. Okay. Okay.

2 Q. Are there any other potential witnesses?

3 A. Just Claudia Mayo. That's -- that's it.

4 Q. Okay.

5 A. Yeah. And she only --

6 Q. Was there anyone outside his office other than
7 Ms. Mayo?

8 A. So you know what, Commissioner Constance's
9 executive assistant was also in the office, but I did --
10 I had a briefing with Commissioner Constance later on in
11 that day. And I didn't bring it up to Commissioner
12 Constance then because I didn't know how this thing was
13 going to pan out or, you know, I -- I don't know what
14 the county attorney had in store. She, I think -- I
15 believe she contacted me the day after or maybe a week
16 after. And she let me know that you were going to --
17 she -- she had hired a firm in Orlando and that you were
18 going to be doing the investigation, and that was it.
19 But I did speak with --

20 Q. That's Ms. Knowlton that you had this
21 conversation with?

22 A. Ms. Knowlton. Yes. Yes. Yes.

23 Q. Okay.

24 A. And I did speak with Janina -- what's Janina's
25 last name? Commissioner Constance's assistant. Let me



MILESTONE | REPORTING COMPANY

TOMORROW'S TECHNOLOGY TODAY

407.423.9900

www.MILESTONEREPORTING.com

CORPORATE ORLANDO, FL 32801
JACKSONVILLE, FL 32256
TAMPA, FL 33602

Toll Free 855-MYDEPOS

1 get her last name. I did speak with her and I told her
2 that me and Commissioner Deutsch had a -- a heated
3 argument. And I asked her, did she hear anything, you
4 know, in her part of the office. Her office is
5 probably, I would say, 20, 30 feet away from
6 Commissioner Deutsch's office. And she said she didn't
7 hear anything, but she could tell I was distraught when
8 I left, because I -- I usually would talk with her, have
9 small talk with her. Talk -- you know, but when I left
10 that day, I just left the building. Didn't really talk
11 to anybody. I dropped off a package to a commissioner,
12 Commissioner Doherty, and left out of the office. Didn't
13 speak to anyone. Went straight downstairs. Kind of --
14 I called my wife and told her what had happened and went
15 back to my office. And I decided to call Attorney
16 Knowlton.

17 Q. Was Claudia Mayo sitting at her desk when you
18 arrived --

19 A. Yes.

20 Q. -- for the briefing on December 12th?

21 A. She has -- yes. She has to escort me in.
22 You're -- you're not allowed to go into the executive
23 office suite without an escort. So you -- you -- when
24 you get there, you call on the phone and they escort you
25 back to his office, so --



MILESTONE | REPORTING COMPANY

TOMORROW'S TECHNOLOGY TODAY

407.423.9900

www.MILESTONEREPORTING.com

CORPORATE ORLANDO, FL 32801
JACKSONVILLE, FL 32256
TAMPA, FL 33602

Toll Free 855-MYDEPOS

1 Q. And then she -- did you see her sit at her
2 desk?

3 A. I didn't see her sit at her desk, but I
4 assumed that she was sitting there. Because when the
5 conversation got heated and when we -- we -- discussion
6 got louder, she came in there, so --

7 Q. Okay.

8 A. But I'm not -- I'm not certain what she
9 overheard. She overheard a little bit as she was in the
10 office, but that's pretty much all I can say on -- on
11 her behalf, so --

12 Q. Okay. All right. If you think of something
13 else after our interview, I'm going to give you my e-
14 mail address.

15 A. Okay.

16 Q. And feel free to contact me. I don't -- I
17 never have an issue with doing a follow-up interview.

18 A. Okay.

19 Q. Because I always want to make sure that we've
20 covered as much information. And I just -- I've been
21 doing this long enough.

22 A. Uh-huh.

23 Q. People get home and then they remember
24 something else. Like, why didn't I say -- so you know,
25 if you think of something else --



MILESTONE | REPORTING COMPANY

TOMORROW'S TECHNOLOGY TODAY

407.423.9900

www.MILESTONEREPORTING.com

CORPORATE ORLANDO, FL 32801
JACKSONVILLE, FL 32256
TAMPA, FL 33602

Toll Free 855-MYDEPOS

1 A. Uh-huh.

2 Q. -- and I'll give you a week, okay?

3 A. Okay.

4 Q. If you think of something else, just let me
5 know and I'll schedule another interview with you.

6 A. Okay. Okay.

7 Q. Okay?

8 A. Okay.

9 Q. Other than that --

10 A. I'm good, though. I -- I just wanted to kind
11 of document this for the record. There's really nothing
12 else to say about this.

13 Q. Okay. Okay.

14 A. Yeah.

15 Q. But I always like to extend the --

16 A. That's --

17 Q. -- the offer.

18 A. Yeah. That's the gist of what happened. We
19 just --

20 Q. Okay.

21 A. Yeah.

22 Q. All right. With that said, we will conclude
23 your interview. And again, I'll give you contact
24 information --

25 A. Uh-huh.



MILESTONE | REPORTING COMPANY
TOMORROW'S TECHNOLOGY TODAY

407.423.9900

www.MILESTONEREPORTING.com

CORPORATE ORLANDO, FL 32801
JACKSONVILLE, FL 32256
TAMPA, FL 33602

Toll Free 855-MYDEPOS

1 Q. -- so that you can contact me if you --

2 A. Okay.

3 Q. -- if you either have any documents you want
4 to send me, any information, or you want a follow-up
5 interview.

6 A. Okay.

7 Q. Okay?

8 A. Uh-huh.

9 MS. GREENE: All right. That is it.

10 THE REPORTER: All right.

11 MS. GREENE: We will conclude the interview.

12 THE REPORTER: We are off the record.

13 (EXAMINATION UNDER OATH CONCLUDED AT 11:31

14 A.M. ET)

15

16

17

18

19

20

21

22

23

24

25



MILESTONE | REPORTING COMPANY

TOMORROW'S TECHNOLOGY TODAY

407.423.9900

www.MILESTONEREPORTING.com

CORPORATE ORLANDO, FL 32801
JACKSONVILLE, FL 32256
TAMPA, FL 33602

Toll Free 855-MYDEPOS

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

CERTIFICATE OF OATH

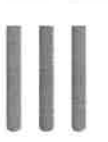
STATE OF FLORIDA
COUNTY OF ORANGE

I, the undersigned, certify that the witness in the foregoing transcript personally appeared before me and was duly sworn.

Identification: Produced Identification

Chalen Cafiero

CHALEN CAFIERO
Court Reporter, Notary Public
Commission Expires: 08/08/2028
Commission No. HH 579949



1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

C E R T I F I C A T E

I, CHALEN CAFIERO, Court Reporter and Notary Public, do hereby certify that I was authorized to and did report the foregoing proceeding, and that said transcript is a true record of the said proceeding.

I FURTHER CERTIFY that I am not of counsel for, related to, or employed by any of the parties or attorneys involved herein, nor am I financially interested in said action.

Submitted on: January 15, 2025.

Chalen Cafiero

CHALEN CAFIERO
Court Reporter, Notary Public



MILESTONE | REPORTING COMPANY

TOMORROW'S TECHNOLOGY TODAY

CORPORATE ORLANDO, FL 32801
JACKSONVILLE, FL 32256
TAMPA, FL 33602

MILESTONE I REPORTING COMPANY

407.423.9900

Fax 407.841.2779

Toll Free 855-MYDEPOS

TOMORROW'S TECHNOLOGY TODAY



1 EXAMINATION UNDER OATH OF CLAUDIA MAYO

2

3

4

5

6

7

8

9

10 DATE: JANUARY 6, 2025

11 REPORTER: CHALEN CAFIERO

12

13

14

15

16

17

18

19

20

21

22

23

24

25

ORIGINAL

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

APPEARANCES

ON BEHALF OF CHARLOTTE COUNTY ADMINISTRATION:

Lindsay N. Greene, Esquire

DSK Law

332 North Magnolia Avenue

Orlando, Florida 32801

Telephone No.: (407) 992-3536

E-mail: lgreene@dsklawgroup.com



MILESTONE | REPORTING COMPANY

TOMORROW'S TECHNOLOGY TODAY

407.423.9900

www.MILESTONEREPORTING.com

CORPORATE ORLANDO, FL 32801
JACKSONVILLE, FL 32256
TAMPA, FL 33602

Toll Free 855-MYDEPOS

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

INDEX

Page

PROCEEDINGS

5

DIRECT EXAMINATION BY MS. GREENE

5



MILESTONE | REPORTING COMPANY

TOMORROW'S TECHNOLOGY TODAY

CORPORATE ORLANDO, FL 32801
JACKSONVILLE, FL 32256
TAMPA, FL 33602

407.423.9900

www.MILESTONEReporting.com

Toll Free 855-MYDEPOS

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

STIPULATION

The Examination Under Oath of CLAUDIA MAYO was taken at CHARLOTTE COUNTY ADMINISTRATION, 18500 MURDOCK CIRCLE, PORT CHARLOTTE, FLORIDA 33948 on MONDAY the 6th day of JANUARY 2025 at 11:40 a.m. (ET); said Examination Under Oath was taken pursuant to the AGREED UPON RULES OF THE PRESENT PARTIES. It is agreed that CHALEN CAFIERO, being a Notary Public and Court Reporter for the State of FLORIDA, may swear the witness.



1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

PROCEEDINGS

THE REPORTER: We are now on the record. Ms. Mayo, could you please raise your right hand for me? Do you solemnly swear or affirm that the testimony you're about to give will be the truth, the whole truth, and nothing but the truth?

THE WITNESS: I do.

THE REPORTER: All right. And you may start.

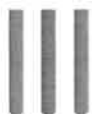
DIRECT EXAMINATION

BY MS. GREENE:

Q. Ms. Mayo, my name is Lindsay Greene, and I've been retained by Charlotte County to conduct an investigation which has to do with an incident between Mr. D'Juan Harris and Commissioner Deutsch, and I understand you may have some information concerning this incident, so I've been -- called you into interview you and see what you may know.

A. Okay.

Q. My role as an investigator, I'm a neutral body in all of this. I don't know you, I don't know anyone, right? So I'm just here to inquire. If there's a question I don't ask you but you think might be important, please give me that information, because my report is as good and thorough as the information that you provide to me. Also, for the sake of a transcript,



MILESTONE | REPORTING COMPANY

325
TOMORROW'S TECHNOLOGY TODAY

CORPORATE ORLANDO, FL 32801
JACKSONVILLE, FL 32256
TAMPA, FL 33602

1 because everything you're saying today is being
2 transcribed, just try and avoid uh-huh, uh-huh, because
3 -- or -- because it can't be transcribed. So try and
4 make all your responses verbal, okay?

5 A. Okay.

6 Q. So just start by telling me what's your job
7 title?

8 A. I am the executive assistant to Commissioner
9 Stephen R. Deutsch.

10 Q. And how long have you served in that role?

11 A. Four years.

12 Q. And where do you sit in relation to
13 Commissioner Deutsch's office?

14 A. Across the hallway from his office.

15 Q. About how many feet is your desk from his
16 office?

17 A. Maybe ten.

18 Q. Okay.

19 A. Maybe.

20 Q. Now, my understanding, and tell me if I'm
21 correct, that there are what's referred to as MPO
22 meetings, and Mr. Harris goes to those who sit on the
23 MPO board and gives MPO briefings to those commissioners
24 that sit on the board. Are you familiar with that?

25 A. Yes. And that is correct.



MILESTONE | REPORTING COMPANY
TOMORROW'S TECHNOLOGY TODAY

407.423.9900

www.MILESTONEREPORTING.com

CORPORATE ORLANDO, FL 32801
JACKSONVILLE, FL 32256
TAMPA, FL 33602

Toll Free 855-MYDEPOS

1 Q. Okay. And on or about December 12, 2024, do
2 you recall Mr. Harris going to Commissioner Deutsch's
3 office for an MPO briefing?

4 A. Yes.

5 Q. Okay. And you were working that day?

6 A. Yes.

7 Q. Were you at your desk at the time that Mr.
8 Harris went into Mr. Deutsch's office?

9 A. Yes.

10 Q. Was Mr. Deutsch's office door open?

11 A. Yes.

12 Q. Could you hear the conversation between Mr.
13 Harris and Mr. Deutsch when they met on December 12,
14 2024?

15 A. Very little.

16 Q. Very little. Tell me what did you hear?

17 A. I heard the commissioner say "Black lives
18 matter." I was having trouble hearing anything else
19 because he turns his TV on every day and leaves it on
20 the whole time. So I specifically heard that, but then
21 I heard TV talking. So what was said after that, I
22 don't know.

23 Q. Did there come a point where you went into
24 Commissioner Deutsch's office while he was meeting with
25 Mr. Harris?



MILESTONE | REPORTING COMPANY

TOMORROW'S TECHNOLOGY TODAY

407.423.9900

www.MILESTONEREPORTING.com

CORPORATE ORLANDO, FL 32801
JACKSONVILLE, FL 32256
TAMPA, FL 33602

Toll Free 855-MYDEPOS

1 A. No.

2 Q. Okay. Did you ever hear any escalated voices
3 between Mr. Harris and Mr. Deutsch?

4 A. No.

5 Q. Did you see anything that was either
6 concerning to you or out of the ordinary that day? And
7 this is specifically during the time that Mr. Harris was
8 meeting with Commissioner Deutsch.

9 A. What I saw was -- as you know, Mr. Harris is
10 in a motorized wheelchair. I heard Mr. Harris engaging
11 his wheelchair to back out of the commissioner's office.
12 Mr. Harris normally doesn't fidget when he's in there
13 doing his pre-agendas. So I thought it was extremely
14 unusual to hear that wheelchair keep -- it kept
15 engaging, because it made, like, a series of clicks. And
16 I heard that a few times. After about, I don't know,
17 ten, 15 minutes I heard it again, and at that point I
18 got up and walked around my desk and was on my way
19 towards the commissioner's office to find out what is
20 going on and why the wheelchair was making that sound.
21 At that point, Mr. Harris very quickly backed out of the
22 commissioner's office, almost ran me over because he
23 didn't know I was there. As Mr. Harris spun around, I
24 heard him say, perhaps under his breath, because I don't
25 know if the commissioner heard him, say we will have



MILESTONE | REPORTING COMPANY

TOMORROW'S TECHNOLOGY TODAY

407.423.9900

www.MILESTONEREPORTING.com

CORPORATE ORLANDO, FL 32801
JACKSONVILLE, FL 32256
TAMPA, FL 33602

Toll Free 855-MYDEPOS

1 this conversation another day, when I'm not here. I was
2 attempting to wish Mr. Harris happy holidays. He looked
3 at me very quickly and shot past me down the hallway in
4 his wheelchair, turned the corner to head to our exit,
5 and that was it.

6 Q. Was that normal behavior for Mr. Harris?

7 A. No.

8 Q. Did he seem upset in any way?

9 A. Extremely.

10 Q. What was it about him, other than -- and I
11 appreciate the description about hearing the wheelchair
12 engage and disengage, but was there anything about his
13 facial expression or body language that gave you the
14 impression that he was upset?

15 A. His facial expression was not normal for Mr.
16 Harris, as Mr. Harris is a very pleasant and polite
17 individual, and he always smiles and takes the time to
18 just have quick, brief, "How you doing? How's things
19 going?", you know, conversations. It was very clear via
20 the expression on his face he was extremely upset.

21 Q. Could you see anything that Commissioner
22 Deutsch was doing anything with regard to his body
23 language when you looked into his office?

24 A. I didn't get that far to look. Our offices
25 are separated by an alcove, if you will. I was almost



MILESTONE | REPORTING COMPANY

TOMORROW'S TECHNOLOGY TODAY

407.423.9900

www.MILESTONEREPORTING.com

CORPORATE ORLANDO, FL 32801
JACKSONVILLE, FL 32256
TAMPA, FL 33602

Toll Free 855-MYDEPOS

1 to the commissioner's office where I could see him when
2 Mr. Harris backed out, which stopped me, because I was
3 trying to get out of Mr. Harris's way. I didn't want
4 him -- because he obviously couldn't see behind him, so
5 I didn't want him to run me over, basically. So I
6 stepped back towards my office when that whole scenario
7 of what I just mentioned to you, Mr. Harris spinning
8 around, saying what he said, and then leaving very
9 quickly.

10 Q. How long have you been employed by the county?

11 A. Six years.

12 Q. Has anyone ever said to you that they found
13 any comments by Commissioner Deutsch concerning or took
14 issue with comments that he made in any manner?

15 A. No.

16 Q. Have you ever heard Commissioner Deutsch,
17 whether it be in an aggressive manner or otherwise just
18 talking, whether just having a discussion, et cetera,
19 and I'm going to use the derogatory word because it has
20 to be in this instance, has anyone ever heard him use --
21 or said to you that they've heard him use the word
22 nigger?

23 A. No.

24 Q. Have you ever heard him use that phrase in any
25 context whatsoever?



MILESTONE | REPORTING COMPANY

TOMORROW'S TECHNOLOGY TODAY

407.423.9900

www.MILESTONEREPORTING.com

CORPORATE ORLANDO, FL 32801
JACKSONVILLE, FL 32256
TAMPA, FL 33602

Toll Free 855-MYDEPOS

1 A. No.

2 Q. Has anyone ever said to you that Commissioner
3 Deutsch has talked about his personal political beliefs
4 with employees of the county?

5 A. No.

6 Q. Has he ever had political conversations with
7 you with regard to his preferences, his political
8 preferences, or his political ideologies? Has he ever
9 had those type of conversations with you?

10 A. No.

11 Q. Is there anything else about that interaction
12 between Commissioner Deutsch and Mr. Harris that we have
13 not discussed thus far?

14 A. No.

15 Q. Is there anything that you can add to your
16 interview or this investigation that we have not covered
17 yet?

18 A. No.

19 Q. If you think of something else after our
20 discussion today, don't hesitate to contact me. I will
21 give you my e-mail address.

22 A. Okay.

23 Q. It is not an issue for me to do follow-up
24 interviews. You know, sometimes you go to a doctor's
25 appointment, you get back, "I forgot to talk about the



MILESTONE | REPORTING COMPANY
TOMORROW'S TECHNOLOGY TODAY

407.423.9900

www.MILESTONEREPORTING.com

CORPORATE ORLANDO, FL 32801
JACKSONVILLE, FL 32256
TAMPA, FL 33602

Toll Free 855-MYDEPOS

1 finger that hurts," if you think about something else,
2 don't hesitate to let me know and I will schedule
3 another interview.

4 A. Yes, ma'am.

5 Q. Okay.

6 A. Yes.

7 MS. GREENE: Other than that, we are concluded
8 for today, okay? Thank you so much, Ms. Mayo.

9 THE WITNESS: I appreciate you. Thank you.

10 MS. GREENE: All right, then, Happy New Year to
11 you.

12 THE WITNESS: Happy New Year to you.

13 MS. GREENE: Thank you.

14 THE REPORTER: Pleasure meeting you, have a
15 great rest of the day.

16 (EXAMINATION UNDER OATH CONCLUDED AT 11:56

17 A.M. ET)

18

19

20

21

22

23

24

25



MILESTONE | REPORTING COMPANY

TOMORROW'S TECHNOLOGY TODAY

407.423.9900

www.MILESTONEREPORTING.com

CORPORATE ORLANDO, FL 32801
JACKSONVILLE, FL 32256
TAMPA, FL 33602

Toll Free 855-MYDEPOS

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

CERTIFICATE OF OATH

STATE OF FLORIDA

COUNTY OF ORANGE

I, the undersigned, certify that the witness in the foregoing transcript personally appeared before me and was duly sworn.

Identification: Produced Identification

Chalen Cafiero

CHALEN CAFIERO

Court Reporter, Notary Public

Commission Expires: 08/08/2028

Commission No. HH 579949



MILESTONE | REPORTING COMPANY
TOMORROW'S TECHNOLOGY TODAY

CORPORATE ORLANDO, FL 32801
JACKSONVILLE, FL 32256
TAMPA, FL 33602

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

C E R T I F I C A T E

I, CHALEN CAFIERO, Court Reporter and Notary Public, do hereby certify that I was authorized to and did report the foregoing proceeding, and that said transcript is a true record of the said proceeding.

I FURTHER CERTIFY that I am not of counsel for, related to, or employed by any of the parties or attorneys involved herein, nor am I financially interested in said action.

Submitted on: January 15, 2025.

Chalen Cafiero

CHALEN CAFIERO

Court Reporter, Notary Public



MILESTONE I REPORTING COMPANY

407.423.9900

Fax 407.841.2779

Toll Free 855-MYDEPOS

TOMORROW'S TECHNOLOGY TODAY



1 EXAMINATION UNDER OATH OF STEPHEN R. DEUTSCH

2

3

4

5

6

7

8

9

10 DATE: JANUARY 6, 2025

11 REPORTER: CHALEN CAFIERO

12

13

14

15

16

17

18

19

20

21

22

23

24

25

ORIGINAL

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

APPEARANCES

ON BEHALF OF CHARLOTTE COUNTY ADMINISTRATION:

Lindsay N. Greene, Esquire

DSK Law

332 North Magnolia Avenue

Orlando, Florida 32801

Telephone No.: (407) 992-3536

E-mail: lgreene@dsklawgroup.com



MILESTONE | REPORTING COMPANY

TOMORROW'S TECHNOLOGY TODAY

407.423.9900

www.MILESTONEREPORTING.com

**CORPORATE ORLANDO, FL 32801
JACKSONVILLE, FL 32256
TAMPA, FL 33602**

Toll Free 855-MYDEPOS

1	INDEX	
2		Page
3	PROCEEDINGS	5
4	DIRECT EXAMINATION BY MS. GREENE	5
5		
6		
7		
8		
9		
10		
11		
12		
13		
14		
15		
16		
17		
18		
19		
20		
21		
22		
23		
24		
25		



MILESTONE | REPORTING COMPANY
TOMORROW'S TECHNOLOGY TODAY

CORPORATE ORLANDO, FL 32801
JACKSONVILLE, FL 32256
TAMPA, FL 33602

407.423.9900

www.MILESTONEReporting.com

Toll Free 855-MYDEPOS

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

STIPULATION

The Examination Under Oath of STEPHEN R. DEUTSCH was taken at CHARLOTTE COUNTY ADMINISTRATION, 18500 MURDOCK CIRCLE, PORT CHARLOTTE, FLORIDA 33948 on MONDAY the 6th day of JANUARY 2025 at 12:09 p.m. (ET); said Examination Under Oath was taken pursuant to the AGREED UPON RULES OF THE PRESENT PARTIES. It is agreed that CHALEN CAFIERO, being a Notary Public and Court Reporter for the State of FLORIDA, may swear the witness.



MILESTONE | REPORTING COMPANY

TOMORROW'S TECHNOLOGY TODAY

CORPORATE ORLANDO, FL 32801
JACKSONVILLE, FL 32256
TAMPA, FL 33602

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

PROCEEDINGS

THE REPORTER: We're on the record. Could you please raise your right hand for me, sir? Do you solemnly swear or affirm that the testimony you're about to give will be the truth, the whole truth, and nothing but the truth?

THE WITNESS: Absolutely.

THE REPORTER: All right. We may begin.

DIRECT EXAMINATION

BY MS. GREENE:

Q. Sir, can you just state your full name please?

A. Steven R. Deutsch.

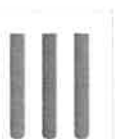
Q. My name is Lindsay Greene, and I have been retained by Charlotte County to conduct an investigation concerning an interaction that you had with Mr. D'Juan Harris. My understanding is that you two had a conversation or an interaction on or about December 12, 2024. Do you recall having a meeting with Mr. Harris on that day?

A. I -- I -- I -- I could verify the date on my calendar, but yes, we did.

Q. Okay. And that the --

A. And it was in my office and it was here.

Q. Okay. And that the purpose of that meeting was for an MPO briefing; is that correct?



MILESTONE | REPORTING COMPANY
TOMORROW'S TECHNOLOGY TODAY

407.423.9900

www.MILESTONEREPORTING.com

CORPORATE ORLANDO, FL 32801
JACKSONVILLE, FL 32256
TAMPA, FL 33602

Toll Free 855-MYDEPOS

1 A. And we never got to that.

2 Q. Okay. So you never got to the MPO briefing?

3 A. No, not really.

4 Q. Okay. So walk me through -- my understanding
5 is the meeting started around 11:00 in the morning,
6 approximately. So Mr. Harris came to your meeting. Do
7 you remember if your door was open or closed?

8 A. It was probably open.

9 Q. Okay.

10 A. Because it -- it's rarely closed.

11 Q. Okay. And so how did the meeting start?

12 A. As I recall -- I'd like to know what he said I
13 said. Are you going to tell me that?

14 Q. Well, I can't get into -- I'm interviewing
15 everyone and I will take the statements that I receive
16 from every person. And then I will conduct a report.

17 A. Okay. Okay. He's leaving shortly. His
18 resignation is official. He's only going to be with us
19 probably matter of a couple weeks.

20 Q. Okay.

21 A. And he did a great job, great leadership. I
22 don't think anyone gave him a higher review than I did
23 on his annual review. I really thought he was an asset.
24 I would love to have -- have him stay.

25 Q. Okay.



MILESTONE | REPORTING COMPANY

TOMORROW'S TECHNOLOGY TODAY

407.423.9900

www.MILESTONEREPORTING.com

CORPORATE ORLANDO, FL 32801
JACKSONVILLE, FL 32256
TAMPA, FL 33602

Toll Free 855-MYDEPOS

1 A. But he got in my office, and I got a gift of
2 that picture from a Democrat friend of mine, okay?

3 Q. So this is a painting?

4 A. It -- well, it was sitting on the chair, and
5 he told me to hang it in his office and it's sort of
6 been sitting there.

7 Q. Okay.

8 A. And I have a lot of friends. I am a absurdly
9 moderate Republican.

10 Q. This is just my phone. I'm going to take a
11 photo of it when I get done. Go ahead.

12 A. I'm an absurdly moderate Republican. My
13 Republican friends say I'm really not a Republican. I'm
14 a phony. I'm a Democrat. And of course the Democrats
15 say, oh, you're one of those Republicans. I -- I have
16 -- end up having coffee at the YMCA after I work out a
17 half hour and everybody else around the table is a
18 Democrat. They're not talking politics now, but you
19 know -- anyway, sorry. And you know, we -- we have our
20 discussion and those sort of things and what happened is
21 I never realized what his politics were, but he really
22 reacted to that photograph, and Trump. And we had a
23 couple of comments and discussion about Trump.

24 Q. What did Mr. Harris say about this painting?

25 A. I don't remember exactly, but there were --



MILESTONE | REPORTING COMPANY

TOMORROW'S TECHNOLOGY TODAY

407.423.9900

www.MILESTONEREPORTING.com

CORPORATE ORLANDO, FL 32801
JACKSONVILLE, FL 32256
TAMPA, FL 33602

Toll Free 855-MYDEPOS

1 there was nothing positive. And it was as negative as
2 things I've heard. And Trump is a polarizing person
3 whether you vote for him or not, and I -- I was sort of
4 surprised. But then we talked about how the discussion
5 talked about where we grew up, how we -- we got into --
6 we were all over like who was poorer and, you know, what
7 our school experience was, and what my school experience
8 was, and what my neighborhood was like, and -- and the
9 same with him. And we may have gotten almost
10 competitive at one time. Well, who was really poorer?
11 You know, and I -- and -- but I was sort of kind of
12 getting to know him.

13 Q. So did this conversation start --

14 A. And I'm going to cut right to the chase --

15 Q. -- the moment he walked in, he saw the
16 painting?

17 A. We -- well, we sat to have the chitchat. I --
18 I don't remember verbatim.

19 Q. Okay.

20 A. And, you know, I've taken an oath and since I
21 enlisted in the service, I've taken that oath at least
22 15 times. I was an elect town council, state senator,
23 state rep up north. I came here to retire and somehow I
24 ended up being a commissioner. So I -- I -- and I also
25 lectured on the constitution for thousands of people



MILESTONE | REPORTING COMPANY

TOMORROW'S TECHNOLOGY TODAY

407.423.9900

www.MILESTONEREPORTING.com

CORPORATE: ORLANDO, FL 32801
JACKSONVILLE, FL 32256
TAMPA, FL 33602

Toll Free 855-MYDEPOS

1 because the constitution was --

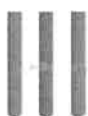
2 Q. So there was a discussion, you two talking
3 about your backgrounds and --

4 A. Yeah, somehow it got back there.

5 Q. Okay.

6 A. And I -- and I was trying to let him know what
7 it was like to be in the Bronx because it was great to
8 be in the Bronx and I -- because it didn't matter really
9 what religion you were or what color you were or where
10 you came from or where you went. Because if you were
11 with the Fordham Baldies, you were with the Fordham
12 Baldies. If you were with the Villa Avenue Boys, you
13 were with the Villa Avenue Boys. And words now that are
14 considered offensive, as the word in question here, I
15 don't want to say they were words of endearment, but
16 Julio who was from Puerto Rico when his mother yelled
17 out the window from her third floor and told him to get
18 up -- to get his butt upstairs and straighten up the
19 room. She didn't say, hey, you little Puerto Rican,
20 come up here. And I won't repeat what she said, because
21 I made the mistake of repeating what something said to
22 me once.

23 Okay. The N-word is what he questioned
24 because he found that offensive. That's what I've been
25 told. And at one point I -- and it is a word I don't



MILESTONE | REPORTING COMPANY

TOMORROW'S TECHNOLOGY TODAY

407.423.9900

www.MILESTONEREPORTING.com

CORPORATE ORLANDO, FL 32801
JACKSONVILLE, FL 32256
TAMPA, FL 33602

Toll Free 855-MYDEPOS

1 use. When I was in the service, they used to bust --
2 bust me up and teased me and called me preacher because
3 I -- I don't think I've sworn since I was 16 or 17 years
4 old. It doesn't do any good anyhow. I constantly
5 correct my friends. It doesn't mean I'm any better than
6 they are, but I find it socially repulsive. I went
7 outside and confronted someone in this building who
8 we've trespassed and had issues with because he has his
9 blank use signs in front of the commissioner building
10 and we can't stop him because the gentleman came up here
11 with his 6 or 7-year-old granddaughter to have an
12 appointment. And I went down and I felt stupid because
13 my brain still thinks I'm 17 and on the streets of the
14 Bronx where I could -- I wasn't the toughest guy in the
15 neighborhood but I could hold my own. I -- anyway, you
16 know, and I went down like, confront -- he's been
17 trespassed by the sheriff. He's been trespassed by
18 Knowlton at the beginning and, you know -- and I said,
19 you know, you don't have to tell me about your right and
20 freedom of speech but have some level of decency. There
21 was a 6, 7-year-old girl walking here. I mean, you
22 really -- would you want that shoved in your daughter or
23 granddaughter's face? And they told me I was crazy to
24 do it because he's nuts and he would -- but, you know,
25 sometimes, you know --



MILESTONE | REPORTING COMPANY

EST. 1986
TOMORROW'S TECHNOLOGY TODAY

407.423.9900

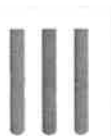
www.MILESTONEREPORTING.com

CORPORATE ORLANDO, FL 32801
JACKSONVILLE, FL 32256
TAMPA, FL 33602

Toll Free 855-MYDEPOS

1 Anyway, I said, growing up in my neighborhood,
2 because my family wasn't real bright because I'm four
3 different nationalities. And the Deutsch end of the
4 family was a long Russian name. That was
5 Deuschoskovsky or some other bizarre -- I've never
6 found the name, and my dad's passed so I'll never know
7 it now, unless I do one of those check things. And they
8 shortened the name to Deutsch before World War I. So
9 our family went through the name Deutsch, which
10 basically means German without the umlaut over the Us
11 for two wars.

12 And I made a point to him, and I -- and I was
13 trying to say what it was like growing up in my
14 neighborhood and this and that, and that know we were so
15 together and, you know, there's words in some society of
16 almost terms of endearment and the first time I heard
17 the N-word and I didn't -- I don't think -- I was at my
18 friend Robbie's house when his mother was yelling at
19 him, because he was Black. But you know, the world was
20 different in the 1950s than it is now. So, at one point
21 I said -- I said, yeah, I grew up -- I grew up and the
22 -- you know, the kids in the neighborhood called me two
23 N-words. And one was the word that he took offense to
24 and the other was Nazi. So I called up being called N
25 and N at one time or other, but that's what happened in



MILESTONE | REPORTING COMPANY

TOMORROW'S TECHNOLOGY TODAY

407.423.9900

www.MILESTONEReporting.com

**CORPORATE ORLANDO, FL 32801
JACKSONVILLE, FL 32256
TAMPA, FL 33602**

Toll Free 855-MYDEPOS

1 the streets where I was. And in the neighborhood where
2 I was. I was a minority member of my building. I was
3 the only white baptist in my apartment house with 40, 50
4 families.

5 But, you know, I'm making notes now because
6 I'm thinking of this because I know the kind of person I
7 am. I know the life that I've lived and I was married to
8 a Black woman for five years. Never even -- never ever
9 entered my mind in all honesty, never thought of it
10 until this whole thing came up here. And for me to say,
11 I don't see -- I don't see color. I don't see -- no,
12 you can see color. I know if somebody is Chinese or
13 Hispanic or Black, you know, you can see that. But I
14 see people first.

15 This -- in fact, I got an award once and that
16 -- there's two or three of the awards I have here. I
17 have most of them at home. I should have had everything
18 here because the stuff that got destroyed in my house. I
19 was -- I was going through post stress, losing all the
20 stuff in the flood. But when I got the human --
21 humanitarian award, and I jotted down some of the
22 recognition I've got from any person that I've tried to
23 lead my life like. They had mentioned that he doesn't
24 have an unloving bias bone or -- in his body. And I got
25 -- I -- I've got about a dozen different awards for



1 humanitarianism. Doesn't mean -- yeah, I guess I could
2 still be a Nazi. I don't know. But you know, for being
3 a humanitarian -- and I lived my life and I was -- and
4 when I said, you know -- so I grew up with that. That's
5 what, you know, I got called those names. And I only
6 said it once. He literally, he reacted more than he did
7 about Trump. And he used at least a half a dozen times
8 to me, the F-word.

9 Q. So you said to Mr. Harris --

10 A. I --

11 Q. You were describing to Mr. Harris how you were
12 raised in the Bronx?

13 A. Yeah, I said, hey, I was called --

14 Q. And you were saying that your childhood
15 friend, Robbie, that --

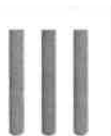
16 A. No, I never told him about Robbie.

17 Q. You didn't tell -- okay. So --

18 A. I -- I -- I thought of that here because you
19 know, this -- this -- I'm flabbergasted. I was -- I was
20 really disappointed.

21 Q. So in what context did the term -- and I got
22 to say it. In what context did you use the word
23 "nigger" when you were talking to Mr. Harris?

24 A. I said exactly. I said, hey, I grew -- grew
25 up being called two N-words. And -- and I said, I grew



MILESTONE | REPORTING COMPANY

TOMORROW'S TECHNOLOGY TODAY

407.423.9900

www.MILESTONEREPORTING.com

CORPORATE ORLANDO, FL 32801
JACKSONVILLE, FL 32256
TAMPA, FL 33602

Toll Free 855-MYDEPOS

1 up being called --

2 Q. Did you actually say the words or you said --

3 A. Yeah.

4 Q. -- two N-words?

5 A. No, I said, I grew up being called --

6 Q. You said Nigger and Nazi?

7 A. -- either a Nigger or a Nazi in my

8 neighborhood.

9 Q. And then did you also say that it was a term
10 of endearment?

11 A. I don't know if I said that or not.

12 Q. Okay.

13 A. I said -- I said that to you. I don't recall
14 if I said that. If he said I said it, I may have. I
15 have a lot of respect for the guy. I --

16 Q. So after --

17 A. I'm flabbergasted by this.

18 Q. So after you used the two N-word terms to Mr.
19 Harris telling him your story --

20 A. Yeah, I was talking about me, not just --

21 Q. You were talking about yourself.

22 A. And there's no question about that.

23 Q. Okay. You said that --

24 A. Because I don't call people names.

25 Q. Okay.



407.423.9900

MILESTONE | REPORTING COMPANY
TOMORROW'S TECHNOLOGY TODAY

www.MILESTONEREPORTING.com

CORPORATE ORLANDO, FL 32801
JACKSONVILLE, FL 32256
TAMPA, FL 33602

Toll Free 855-MYDEPOS

1 A. I don't even say they're dumb or stupid or
2 lazy.

3 Q. So then after that --

4 A. My kids, that's another story.

5 Q. So after that, you said Mr. Harris responded
6 by -- he was very upset.

7 A. Oh, he used the F-word to me.

8 Q. And he used the word, and I got to say it. He
9 used the word "fuck" to you.

10 A. Oh, yeah.

11 Q. What did he say to you after you used the term
12 "nigger" to him?

13 A. Well, he said, F you and don't you ever use
14 that effing word around me and -- oh, he must have said
15 it at least six, seven or eight times. And I said,
16 whoa, I'm sorry. I said, hey -- I said, you know, I
17 grew up with that. I didn't mean to offend you. He
18 said -- he says, well and went on and on, and he sort of
19 stopped swearing and then maybe one or two more came
20 out. And I said, hey, I profusely apologize. I -- I
21 said, I don't use that word. And -- and I said that to
22 him and -- and -- but he was -- I have -- he's as angry
23 as I've seen a person in recent history and, you know, I
24 -- I have -- and oh, we were talking about libraries and
25 books and background because I have a -- sure, if I



MILESTONE | REPORTING COMPANY

TOMORROW'S TECHNOLOGY TODAY

407.423.9900

www.MILESTONEREPORTING.com

CORPORATE ORLANDO, FL 32801
JACKSONVILLE, FL 32256
TAMPA, FL 33602

Toll Free 855-MYDEPOS

1 stayed in -- didn't go in the service, I would've
2 probably been a high school dropout. I got two master's
3 degrees and I walked away from a doctorate at Brown
4 because I couldn't afford it anymore.

5 So I'm not stupid. And I have a half a brain
6 and -- and I absolutely know the kind of person I am. I
7 -- I just for fun, went down -- listen, I've had about
8 15 awards and -- and they started a long time ago. And
9 you can look at the humanitarian award there. I got a
10 -- a special service award from undergraduate school.
11 The JCs recognized me for what I did in Jersey. I was
12 appointed to a five state Special Action Commission in
13 the '60s to go into the inner city and help cool things
14 down because of who I am, or what I was, or where my
15 brain was, or how I saw people living in love and
16 harmony in my 1960s kind of fantasy.

17 Q. How did that interaction end between yourself
18 and Mr. Harris?

19 A. I -- I apologized, and I'm not the kind of
20 person that apologizes a lot, but I was -- never ever
21 thought -- I mean, I -- sometimes my mouth moves ahead
22 of my brain. I -- I'll acknowledge that. But I never
23 ever, ever would have said anything to offend someone.
24 To give them a bad time, to kid and joke, yeah, that's
25 the kind of person I am. I would never say anything to



MILESTONE | REPORTING COMPANY

TOMORROW'S TECHNOLOGY TODAY

407.423.9900

www.MILESTONEREPORTING.com

CORPORATE ORLANDO, FL 32801
JACKSONVILLE, FL 32256
TAMPA, FL 33602

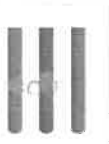
Toll Free 855-MYDEPOS

1 offend anyone. I'm not that kind of person.

2 Q. Did you ever at any time --

3 A. -- now, in retrospect, if I knew what I knew
4 now, obviously it never would've -- and it's a -- and
5 it's a word like the word that he used to me, no one's
6 ever heard me say that word, not -- my kids can't even.
7 And I think once I did during a divorce, they may have
8 heard that word once. But I -- I just don't do it. I
9 -- it doesn't serve any purpose and, you know, I -- I
10 can -- my family is multiracial. It's multi-religious.
11 It's, you know, from the Italians to the Irish to the
12 Germans to the -- my father's side of the family was
13 Jewish. My -- oh, grandparents' side and on the other
14 side, they were Lutheran. And so they were English,
15 Irish, German. My stepfather was Italian Catholic. He
16 played cards with Cardinal Spellman down in St.
17 Patrick's Cathedral. He was an attorney, who probably
18 worked with the mafia. I'm not sure of that either.

19 But -- but -- but I know the kind of person I
20 am. I never in my life would do anything to offend
21 someone. It wasn't intended that way. And it certainly
22 was not -- in no way directed to him. So, I'm trying to
23 think what did I do wrong here, other than say something
24 that's probably stupid and I shouldn't have said it. But
25 I was talking about me. I was talking about when I grew



MILESTONE | REPORTING COMPANY

TOMORROW'S TECHNOLOGY TODAY

407.423.9900

www.MILESTONEREPORTING.com

CORPORATE ORLANDO, FL 32801
JACKSONVILLE, FL 32256
TAMPA, FL 33602

Toll Free 855-MYDEPOS

1 up, and what I went through with my family. And he was
2 telling me what he went through with his family, and
3 I --

4 Q. Well, give me an example. What did he say?

5 A. And in another setting, without that reaction,
6 we probably could have ended up even a lot, lot closer
7 than just having a business relationship because in a
8 way, I was sort of opening up about things that I don't
9 normally talk to. I don't think anyone here even knows
10 the gal I was married to that I mentioned to you, right?
11 I didn't talk about it. You know, and they don't know
12 about, other than the stuff that's hanging on the walls
13 and -- and some of the recognition of things I've gotten
14 because the kind of person I am. I -- you know, I'm not
15 the brightest. I'm not the best. I can be a buster. I
16 love to kid and joke. But I'm a people person. I
17 didn't say things to hurt anyone ever.

18 Q. What did Mr. Harris tell you about his
19 background?

20 A. He talked about, you know, his school was
21 pretty tough. He talked about things relating to
22 segregation and things that he had to deal with, you
23 know, growing up. And -- and I think at one point we
24 may have gotten a little competitive.

25 Q. Did he say where he grew up?



MILESTONE | REPORTING COMPANY

TOMORROW'S TECHNOLOGY TODAY

407.423.9900

www.MILESTONEREPORTING.com

CORPORATE ORLANDO, FL 32801
JACKSONVILLE, FL 32256
TAMPA, FL 33602

Toll Free 855-MYDEPOS

1 A. He did. I -- and again, you know, I'm -- I'm
2 -- I'm so emotionally stressed over this thing. I
3 normally only sleep two, two and a half hours a night.
4 I've been down to an hour, an hour and a half since this
5 came up because I'm sort of taken aback, but it just --

6 Q. What did he say about his segregation
7 experience?

8 A. I don't recall. I -- I don't want to quote
9 things he said if I -- and if you know, I -- I -- my
10 guess is that he said -- he said some things. I'm sure
11 they were valid and true.

12 Q. What did he say about --

13 A. You know, I look -- I look at the Black youth
14 organization, The Oranges of Newark. I don't know if
15 you ever heard of them, but -- or Cliff Carter.

16 Q. What did he say about poverty?

17 A. Hold it, I just thought of this. I read H.
18 Rap Brown's book. Do you know the title of book?

19 Q. Which one?

20 A. That has the N-word in it?

21 Q. Uh-huh.

22 A. I mean, because I have an incredible library
23 because it's part of what I studied in one of my
24 master's degrees.

25 Q. Okay.



MILESTONE | REPORTING COMPANY

TOMORROW'S TECHNOLOGY TODAY

CORPORATE ORLANDO, FL 32801
JACKSONVILLE, FL 32256
TAMPA, FL 33602

407.423.9900

www.MILESTONEREPORTING.com

Toll Free 855-MYDEPOS

1 A. And in the group relations and -- you know,
2 because this is what I did.

3 Q. What did Mr. Harris say about his poverty?
4 You said you two were talking about --

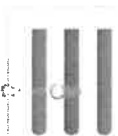
5 A. Well, that he was poorer than I was. And
6 things generally were tougher for him than they were for
7 me.

8 Q. Did he give any examples? What did he say?

9 A. He probably did. You know, I'm -- I'm really
10 -- I don't want to -- I don't want to misrepresent
11 something if it -- and I literally don't -- I'm not even
12 -- you know, I'm -- and I'm using a five-inch brush with
13 the things that I'm saying I said. But I know when it
14 came to those N-words -- and if he ever -- if he said I
15 referred to him or called him either one of those,
16 that's an absolute lie because I did not. I said that's
17 what I was called in my neighborhood and that was the
18 only reference I made. That was once and he -- he lost
19 control. And I -- I -- I -- in fact, I used the word
20 profusely, which I probably couldn't spell, but I -- but
21 I -- I said, hey, I am so sorry. I wouldn't say that,
22 you know. And he --

23 Q. Did you ever gesture with your fist in the air
24 saying, fight, fight, fight, fight?

25 A. I don't think so. I don't think so. Unless I



MILESTONE | REPORTING COMPANY

TOMORROW'S TECHNOLOGY TODAY

407.423.9900

www.MILESTONEREPORTING.com

CORPORATE ORLANDO, FL 32801
JACKSONVILLE, FL 32256
TAMPA, FL 33602

Toll Free 855-MYDEPOS

1 was mocking something Trump did when he was talking
2 about Trump, because he flipped out over Trump. Not as
3 bad as he did over me, but close. And I'm -- I -- I'm
4 literally taken aback and amazed seriously that anything
5 -- because I -- I have friends of color that use those
6 words a lot with me, both of them, all three of them.

7 Q. Is there anyone who may have overheard your
8 interaction with Mr. Harris?

9 A. I don't think so. I don't think so.

10 Q. Did anyone come in the office while you two
11 were talking?

12 A. No. He was -- maybe the door was closed. I
13 don't know. It's rare that I close the door.

14 Q. Okay.

15 A. You know, I -- I -- if he said the door was
16 closed or whatever he said, I'm sure he's right.

17 Q. Okay.

18 A. I don't know if you asked him that.

19 Q. Okay. Is there anything else that you'd like
20 to add that we haven't covered yet?

21 A. No. I -- I -- I was frankly, and I -- I tried
22 to do a little research, the word he called me, I
23 couldn't find in the dictionary.

24 Q. What word did he call you?

25 A. When he used the F-word to me.



MILESTONE | REPORTING COMPANY

TOMORROW'S TECHNOLOGY TODAY

407.423.9900

www.MILESTONEREPORTING.com

CORPORATE ORLANDO, FL 32801
JACKSONVILLE, FL 32256
TAMPA, FL 33602

Toll Free 855-MYDEPOS

1 Q. Oh, okay.

2 A. And I never referred to him with the word. I
3 mean, he only used it to me once. He said -- and then
4 -- well, maybe twice. But then he just said -- he
5 referred to the F-word in relationship to the -- to the
6 N-word. You know, I hate that word and I, you know -- I
7 -- but -- and I just mentioned in passing that I grew up
8 and that's what I was called in my neighborhood by my
9 friends who are multiracial, multi -- you know, the only
10 prejudice I really saw in my neighborhood in retrospect
11 was the Catholics hated the Jews. And I -- and -- you
12 know, and I -- and I can remember, you know, as we got
13 to be 14 and 15 and could solve the problems of the
14 world, I can remember saying, why -- why do you -- why
15 do you hate the Jews? Well, they killed Jesus. Wasn't
16 Jesus Jewish? You know, and then they'd say, well --
17 you know, we -- I mean, the kind of banter you'd have on
18 the street corner. They'd say, yeah, well, you know,
19 you guys keep your churches locked up. I says, yeah,
20 because you guys are going to come in to steal the
21 stuff. You know?

22 But I mean, you know -- and -- and -- but I --
23 I have -- I have no idea what I can say at this point.
24 And I repeatedly apologized to him because I was like,
25 shocked. I was taken aback of how aggressive he got



MILESTONE | REPORTING COMPANY

TOMORROW'S TECHNOLOGY TODAY

407.423.9900

www.MILESTONEREPORTING.com

**CORPORATE ORLANDO, FL 32801
JACKSONVILLE, FL 32256
TAMPA, FL 33602**

Toll Free 855-MYDEPOS

1 with me and, you know, intellectually I still have a lot
2 of respect for him. He may have an issue with some
3 things, I may have issues with some things, but I -- I
4 was really flabbergasted and -- and I -- I can only talk
5 about the -- the people in my family and the people I
6 know, and I deal with people as human beings. You know,
7 I'm -- I'm a people person. I -- I'm -- I'm just
8 shocked, hurt, disappointed, offended and -- and from
9 probably 50 years ago. Yeah, maybe 50 years ago,
10 because I'm old. I probably would've reacted to
11 somebody calling me that name like that.

12 Q. Using the word "fuck," you're referring to?

13 A. Oh, yeah.

14 Q. And I'm not saying it callously. I'm just on
15 the record, to confirm what was said.

16 A. No, I understand that. But -- oh, yeah. I
17 might have. And again, it would've been like, you know
18 -- I don't know what to say. I -- I -- I -- I -- I am
19 amazed that -- I said, well, what, am I trouble? You're
20 not charged for anything. He said, well, it -- it
21 really wasn't professional. I said, I never referred to
22 him. I said, I -- I said, we were talking about our
23 environment we grew up. I was trying to, hey, that's
24 what I grew up with. I was poor. I didn't get an
25 allowance. And I started working at 6, 7 years of age.



MILESTONE | REPORTING COMPANY

TOMORROW'S TECHNOLOGY TODAY

407.423.9900

www.MILESTONEREPORTING.com

CORPORATE **ORLANDO, FL 32801**
JACKSONVILLE, FL 32256
TAMPA, FL 33602

Toll Free 855-MYDEPOS

1 And I may have even called -- I remember one time I had
2 to go four blocks and go up to the fourth floor of an
3 apartment house with two bags I could barely carry and a
4 lady gave me a nickel. I probably may have told -- you
5 know, but that's what I grew up with. But we were
6 together and, you know, we were -- we were all friends.

7 And I -- and I -- and I went to the synagogue
8 when I had a guy -- a friend of mine got Bar mitzvahed,
9 and I'd go to Mass and then I'd tell the guy about how
10 come they don't have it in English, because they don't
11 want you to know what they're saying. But it was a --
12 maybe I -- I'm just -- maybe I'm just too old to be
13 around in this environment and -- and -- and out of
14 touch. I like to think I'm in touch. I -- I take
15 everything -- I -- I -- well, I kid and joke, I'm a
16 people person. When I raise my hand and take my oath
17 the same way I did in the service, I've been elected to
18 public office, probably seven years of my life, I've
19 never missed a session or a vote. Find me one other
20 person in any legislature that can make that comment. I
21 wouldn't take a walk on a bill ever. Ever. Never. They
22 got me in the little manual on the history books in
23 Rhode Island. Never missed a vote as a councilman, the
24 state rep, or state senator. And then in 1990, they
25 couldn't find somebody dumb enough to run for lieutenant



MILESTONE | REPORTING COMPANY

TOMORROW'S TECHNOLOGY TODAY

407.423.9900

www.MILESTONEREPORTING.com

CORPORATE ORLANDO, FL 32801
JACKSONVILLE, FL 32256
TAMPA, FL 33602

Toll Free 855-MYDEPOS

1 governor over -- as a Republican in Rhode Island, which
2 is crazy running for Republican anyhow in Rhode Island.
3 It's like 80 percent Democrat. I ran for lieutenant
4 governor. I think I got 27 percent of the vote. A
5 couple more than the guy running for governor, but they
6 had to -- do you know how that worked?

7 Q. How?

8 A. Put your kiss next to the Democratic or
9 Republican and everybody from president down the school
10 -- school committee would get your vote.

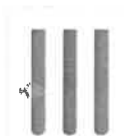
11 Q. Oh, okay.

12 A. And you could go back and change them. They
13 did away with it since then.

14 Q. All right. Okay.

15 A. Yep, so -- but I -- I don't know what to say.
16 And -- and I literally -- I don't think I've ever
17 apologized to anyone as soon as I did to him, because I
18 have a lot of respect for the guy. I think he did a --
19 a great job for -- and the little interaction I had with
20 him, you know, I -- I thought he was pretty sharp. And
21 I -- one time he was in here, he told me how he ended up
22 in a wheelchair and -- but I really thought, we might be
23 friends. Boy, I was wrong on that. Well, who knows?
24 You know.

25 Q. Well, Mr. Deutsch, thank you for your time.



MILESTONE | REPORTING COMPANY

TOMORROW'S TECHNOLOGY TODAY

407.423.9900

www.MILESTONEREPORTING.com

CORPORATE ORLANDO, FL 32801
JACKSONVILLE, FL 32256
TAMPA, FL 33602

Toll Free 855-MYDEPOS

1 If you think of something else and you want me to
2 interview you again, that's always an option for you.

3 A. Yeah. I --

4 Q. But I appreciate it.

5 A. I don't know what more I can say. There was
6 never ever anything in a negative way headed to him. I
7 didn't even argue with him about the Trump thing. He
8 really -- I don't know if he mentioned that.

9 Q. Now, was that all the same day?

10 A. Oh, yeah. It was all in --

11 Q. That was all the same day, the same meeting?

12 A. The conversation was like 30, 40 minutes.

13 Q. Okay.

14 A. And we never got to talk about what we were
15 supposed to because somehow, maybe -- and I still
16 haven't decided if I want to put that picture on the
17 wall. I want to see if he can act a little bit more
18 presidentially.

19 Q. Did you express your views at all during that
20 December 12th meeting with Mr. Harris as to who you had
21 supported for president?

22 A. I may have. I don't think so. Yeah. I -- I
23 wasn't -- I think the Democrats would've done better. I
24 -- I don't think Harris was a really good candidate,
25 frankly. I think Biden would've been a better



MILESTONE | REPORTING COMPANY

TOMORROW'S TECHNOLOGY TODAY

407.423.9900

www.MILESTONEReporting.com

CORPORATE ORLANDO, FL 32801
JACKSONVILLE, FL 32256
TAMPA, FL 33602

Toll Free 855-MYDEPOS

1 candidate, you know. Or maybe Newsom should have stuck
2 in. I don't know, because she didn't seem to be able to
3 deal with the issues. Although, hey, you know, Trump
4 was -- I felt Trump was right about one thing, but Biden
5 didn't win the election four years ago. Trump lost it
6 because he couldn't shut his big mouth. Biden just
7 stayed home and he won because Trump doesn't know how to
8 shut up. Sort of like what I'm doing now. Yeah. I'm
9 sorry. It might be a New York thing.

10 Q. Well, we are done. And this concludes your
11 interview. And like I said, at any time, if you want to
12 talk again, I'll give you a week, if you want to have
13 another interview, I'm always available, okay?

14 A. Yeah. I don't know. I mean, I can tell you
15 about awards I've gotten and -- and my lifetime and
16 where it's been and all the way from 1957 up to -- up to
17 recently. I kid about it. Well, I love the food and I
18 was at an event last week, with -- like three years ago,
19 the Filipino American Society. I'm the first non-
20 Filipino they made an honorary member. And that was so
21 cool. And -- and I said -- and I said to them, I says,
22 because you know I like the food, right? You know --
23 and they says, no, because you're so great and if we
24 ever need anything, you're there. We can count on you
25 and support us and, you know -- you know, so --



MILESTONE | REPORTING COMPANY

TOMORROW'S TECHNOLOGY TODAY

407.423.9900

www.MILESTONEREPORTING.com

CORPORATE ORLANDO, FL 32801
JACKSONVILLE, FL 32256
TAMPA, FL 33602

Toll Free 855-MYDEPOS

1 Q. Well, thank you, Mr. Deutsch.

2 A. I -- I would not ever in my life do anything
3 to hurt or offend another human being. I can't do it.
4 You know, and if I accidentally do something stupid
5 behind a wheel and somebody makes an obscene gesture at
6 me, I yell after him, have a Merry Christmas. I may not
7 have done that when I was 17, but, you know -- and I --
8 I am literally incredibly internally upset over this.

9 Q. How long have you had this painting? Let me
10 take a photo of it while I'm here.

11 A. Since maybe late October, early November.

12 Q. Has it sat in this spot?

13 A. Yeah. Because he said, put it on the wall.
14 And he -- and he -- he brought them and gave it to me as
15 a gift. And -- and this guy is a fanatical Democrat,
16 like he -- he writes a check every month for the -- the
17 guy that made the gift, to the Democrat party. He does
18 it every --

19 Q. So you've had it in this seat right here since
20 October or so?

21 A. Either there or on another chair.

22 Q. But somewhere on display?

23 A. Yeah. Well, not on display. If it was on
24 display, it would be on the wall. I just threw it there
25 when I came in, it was in my arms.



MILESTONE | REPORTING COMPANY

TOMORROW'S TECHNOLOGY TODAY

407.423.9900

www.MILESTONEREPORTING.com

CORPORATE ORLANDO, FL 32801
JACKSONVILLE, FL 32256
TAMPA, FL 33602

Toll Free 855-MYDEPOS

1 Q. Okay.

2 A. And -- and that's probably, you know -- I
3 hadn't -- you know, I have a lot of my life's history.
4 You know, I -- most of the president before it happens
5 to be there, I'm the clown in the middle. The guy on
6 the right is dead. That's -- that was the Prince of
7 Providence. If you want to talk about it. Have you ever
8 heard of Buddy Cianci?

9 Q. No, I haven't.

10 THE REPORTER: No, I haven't.

11 THE WITNESS: All right. He went to -- they
12 sent him to jail because his wife was having an
13 affair and they got some police guys, they brought
14 the guy in and treated him wrong, and he ended up
15 going to jail for it. He got out of jail. They
16 reelected him in -- in Providence as a -- as mayor
17 again. So he was called the Prince of Providence.
18 I even bought the book to read to make sure my name
19 wasn't in there. I knew him pretty well. Although
20 I did meet Raymond Junior once, too, so -- but --

21 MS. GREENE: All right. Well, thank you for
22 your time today.

23 THE WITNESS: Yeah, I --

24 THE REPORTER: Thank you, sir.

25 THE WITNESS: I have no idea what I can say



MILESTONE | REPORTING COMPANY

TOMORROW'S TECHNOLOGY TODAY

407.423.9900

www.MILESTONEReporting.com

CORPORATE ORLANDO, FL 32801
JACKSONVILLE, FL 32256
TAMPA, FL 33602

Toll Free 855-MYDEPOS

1 more. And I -- I -- I don't think I've ever
2 apologized to anyone as strongly as -- as I did to
3 him. I said, if I offended you, I'm -- you know, I
4 am like so sorry. I -- I said, you know, I can't
5 ever remember using that word. You know, if
6 somehow --

7 MS. GREENE: We're not off the record yet --

8 THE REPORTER: We're not but we're off --

9 MS. GREENE: Okay. You're --

10 THE WITNESS: I'm sorry.

11 MS. GREENE: No. Are we off now?

12 THE REPORTER: Yeah. We're off the record

13 and --

14 (EXAMINATION UNDER OATH CONCLUDED AT 12:46

15 P.M. ET)

16

17

18

19

20

21

22

23

24

25



MILESTONE | REPORTING COMPANY

TOMORROW'S TECHNOLOGY TODAY

407.423.9900

www.MILESTONEREPORTING.com

CORPORATE ORLANDO, FL 32801
JACKSONVILLE, FL 32256
TAMPA, FL 33602

Toll Free 855-MYDEPOS

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

CERTIFICATE OF OATH

STATE OF FLORIDA
COUNTY OF ORANGE

I, the undersigned, certify that the witness in the foregoing transcript personally appeared before me and was duly sworn.

Identification: Produced Identification

Chalen Cafiero

CHALEN CAFIERO
Court Reporter, Notary Public
Commission Expires: 08/08/2028
Commission No. HH 579949



1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

C E R T I F I C A T E

I, CHALEN CAFIERO, Court Reporter and Notary Public, do hereby certify that I was authorized to and did report the foregoing proceeding, and that said transcript is a true record of the said proceeding.

I FURTHER CERTIFY that I am not of counsel for, related to, or employed by any of the parties or attorneys involved herein, nor am I financially interested in said action.

Submitted on: January 15, 2025.



CHALEN CAFIERO
Court Reporter, Notary Public

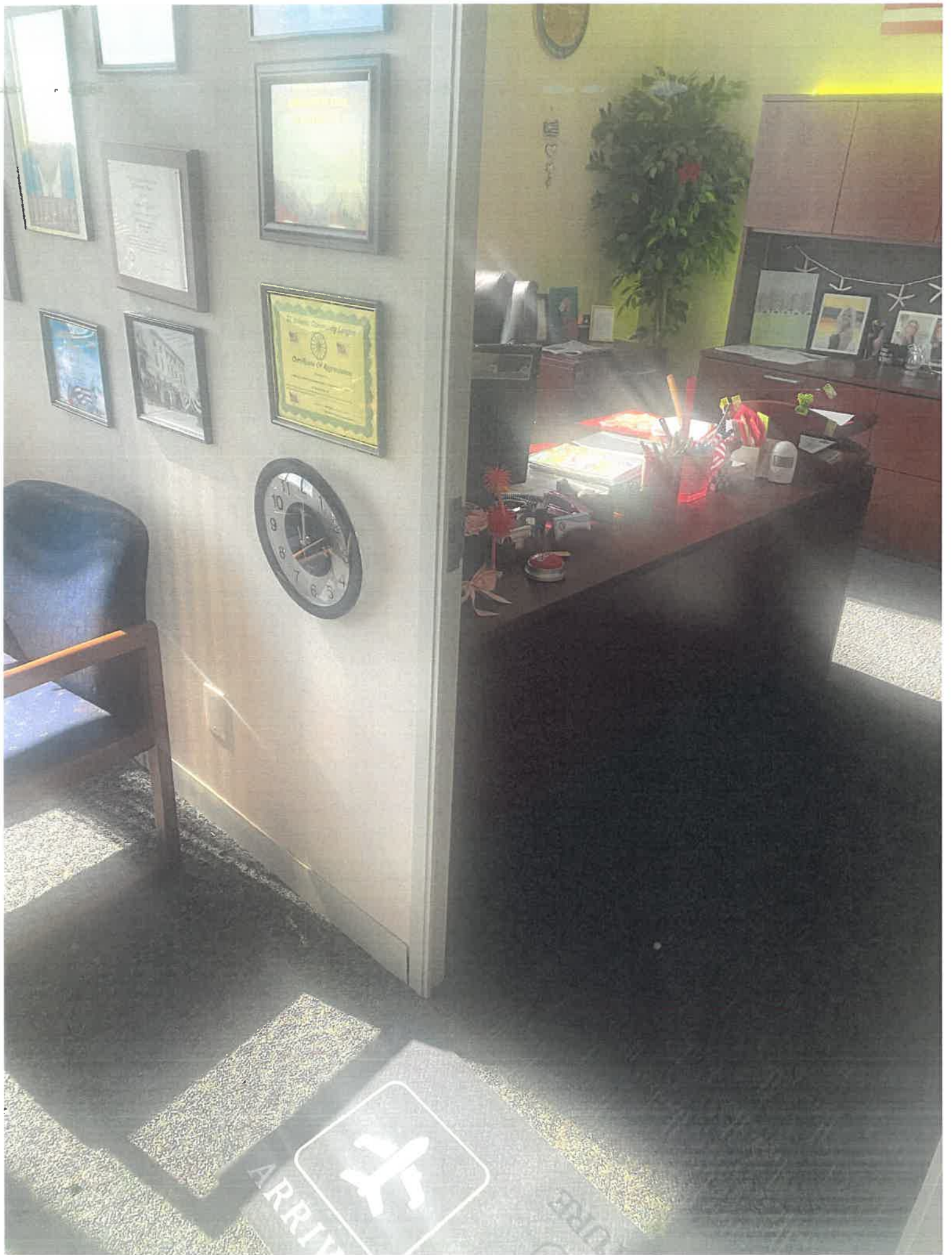


MILESTONE | REPORTING COMPANY

TOMORROW'S TECHNOLOGY TODAY

CORPORATE ORLANDO, FL 32801
JACKSONVILLE, FL 32256
TAMPA, FL 33602

COMPOSITE EXHIBIT “B”



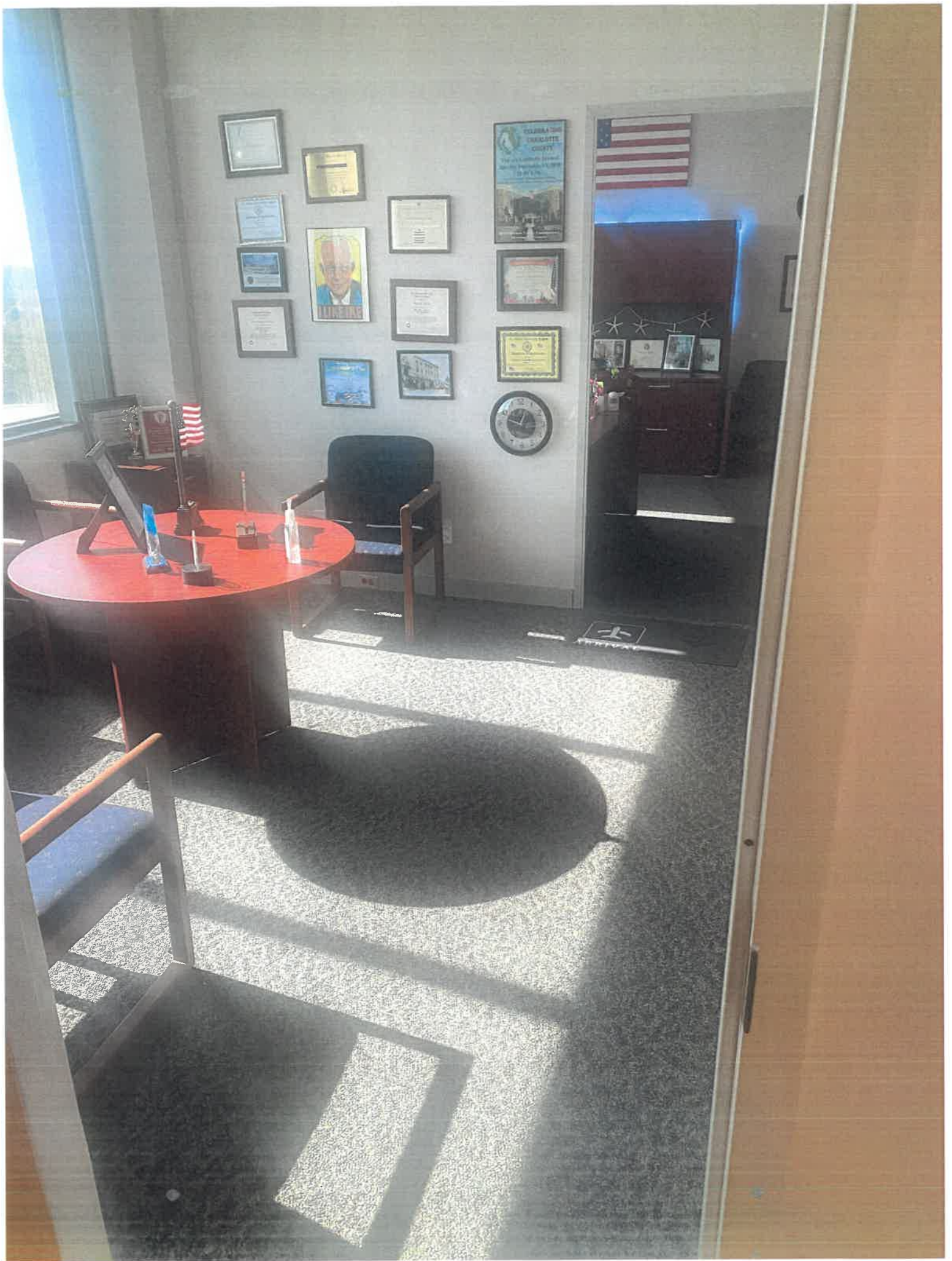




EXHIBIT “C”

