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	4
	5 EXAMINATION
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REPORTED BY: Heather M. Thomas,	19
Court Reporter	20
Courteporter	21 22
	22
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	25
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1 APPEARANCES FOR THE CITY OF JACKSONVILLE:	1 SHAWN EADS,
2 LEE WEDEKIND, ESQUIRE Nelson, Mullins, Riley & Scarborough, LLP	2 having been produced and first duly sworn as a witness,
3 50 North Laura Street, 41st Floor	3 testified as follows:
Jacksonville, FL 32202	4 THE WITNESS: I do.
4 5 SEAN GRANAT, ESQUIRE	5 EXAMINATION
ADINA TEODORESCU, ESQUIRE	6 BY MR. GRANAT:
6 CHRISTOPHER GARRETT, ESQUIRE	7 Q Could you tell us your name, please?
ARIEL COOK, ESQUIRE (Appearing telephonically) JODY BROOKS, ESQUIRE (Appearing telephonically)	8 A Shawn Eads.
Office of General Counsel	9 Q Okay. Mr. Eads, a couple things that I want
8 117 West Duval Street, Suite 480	10 to go over before we get started. First, you this is
Jacksonville, FL 32202 9	11 a JEA investigation that we're conducting now.
10 KEVIN BLODGETT, ESQUIRE	12 Are you aware of that?
Smith, Hulsey & Busey	13 A Yes.
11 One Independent Drive, Suite 3300 Jacksonville, FL 32202	14 Q Okay. And you've also been ordered by
12	15 Paul McElroy to appear today and answer the questions
13 14 ALSO PRESENT: ELIGENE NICHOLS ESOLURE	<ul><li>16 that we ask you concerning your employment at JEA.</li><li>17 Do you understand that?</li></ul>
14 ALSO PRESENT: EUGENE NICHOLS, ESQUIRE 15	<ol> <li>Do you understand that?</li> <li>A I do.</li> </ol>
16	<ul> <li>10 A 1 do.</li> <li>19 Q Okay. And I was handed by your attorney</li> </ul>
17 18	20 what's called a Garrity rights form, a statement of your
10	<ul> <li>rights, explaining that you've been directed by JEA to</li> </ul>
20	22 appear and truthfully answer questions, and failure to
21 22	<ul><li>do that will result in grounds for termination.</li></ul>
23	24 Do you understand that? Termination with
24	25 cause.
25	

1 (Pages 1 to 4)

	Page 5		Page 7
1	A Yes.	1	A I think it's okay.
2	Q Okay. Do you have any questions about your	2	Q Okay.
3	Garrity rights?	3	A I mentioned about my first boss, Julio Romero.
4	A No.	4	I mentioned in my testimony that he was terminated. I
5	Q Okay. And your attorney, Gene Nichols, is	5	think I said in there May several times. That was
6	here with you as a witness; is that right?	6	incorrect. That was July. It was said in there a
7	A Yes.	7	couple of times I said May, and it was July.
8	MR. GRANAT: I'm going to attach the Garrity	8	Q Okay. You said he was terminated?
9	rights statement we just discussed as Exhibit 1.	9	A I said he left.
10	(Exhibit Number 1 was marked for	10	Q He left, okay.
11	identification.)	11	A I said he left.
12	BY MR. GRANAT:	12	Q He left in July
13	Q We're all wearing masks as we sit here, and it	13	A Yes.
14	may be difficult to hear my questions. If that happens,	14	Q and not May. Okay.
15	please let me know, or if I just ask you a jumbled	15	Was there anything else as you reviewed your
16	combination of words that you just don't understand what	16	transcript from December that you thought was incorrect?
17	I'm getting at, please let me know and I'll rephrase the	17	A No.
18	question. Okay?	18	Q Okay. As you reviewed your transcript from
19	The goal here is for us to just find out what	19	December, was there anything that struck you as any
20	you know about really the last year of your work at JEA.	20	of your answers that struck you as incomplete that maybe
21	We do expect you to tell the truth today, and I'm asking	21	you should have provided more information to a question?
22	you to come forward with information. Even if my	22	A With the information that I knew on
23	question isn't artfully worded and asked, if you	23	December 26th or the information I know now?
24	understand what I'm getting at or the information that	24	Q With the information you know now.
25	I'm trying to get at, I'd ask that you please answer the	25	A That's hard to answer, because I answered it
	Page 6		Page 8
1	question and provide the information.	1	with what I knew at the time.
2	Do you agree to do that?	2	Q Okay.
3	A Yes.	3	A Being involved in a lot of data gathering with
4	Q What did you do to prepare for the interview	4	individuals at this table through multiple
5	today?	5	investigations, I have found lots of things.
6	A I reviewed my previous testimony from	6	Q And it's not a trick question.
7	December 26th, and I briefly met with my attorney.	7	A Yeah, no.
8	Q Did you review any other documents besides	8	Q It's not a gotcha. I'm just asking as we sit
9	your testimony?	9	here today, is there anything you recently reviewed
10	A I did not.	10	your transcript.
11	Q Other than your attorney, did you speak to	11	Is there anything that you feel that you today
12	anyone to prepare for today?	12	could elaborate on?
13	A I did not.	13	A I think I'd have to be asked a question about
14	Q How much time would you say overall you spent	14	something in particular. To be honest, I did not review
15	in preparation for this interview?	15	it with that light. I reviewed it with on
16	A Three to four hours.	16	December 26th when I answered the questions, did I
17	Q When did you last read your interview that you	17	answer them with what I knew on December 26th? I think
18	gave in December?	18	you're asking me now with a different light, and I
19	A Sunday.	19	didn't read my transcript that way.
20	Q When you read your interview from December,	20	Q So when you answered the questions in
21	did anything stand out to you that was wrong and that	21	December, you feel you answered them truthfully and
22	you needed to correct?	22 23	completely? A Yes.
23 24	A Yes.	23	<ul><li>A Yes.</li><li>Q Can you tell me how you came to be hired by</li></ul>
24	Q Can you tell me about that? I have a copy of it if that will be helpful.	25	JEA?
	A h and will be helpful.		· · · · ·

	Page 9		Page 11
1	A I was interviewed by Melissa Dykes on the	1	Q It was bigger at GE Appliances?
2	phone. I was interviewed by Angie Hiers well, Angie	2	A I'm sorry. I'm sorry. Because JEA and GE
3	Hiers and Ryan Wannemacher in person in early	3	sorry. Can you ask it again?
4	January 2019, and I was interviewed on the phone and in	4	Q Sure.
5	person by Aaron Zahn.	5	Was your budget that you were responsible for
6	Q Where did you come from?	6	at JEA larger than your budget at GE Appliances?
7	A I come from Louisville, Kentucky. I was	7	A Yes.
8	working for GE Appliances.	8	Q Did you have any experience before you were
9	Q Was that a manufacturing job?	9	hired with JEA with utilities, power or water?
10	A I was in IT. We are GE Appliances is a	10	A Did I have any experience with utilities? I
11	U.S. manufacturer of consumer of appliances.	11	did have a role at GE Appliances where I helped build a
12	Q And what was your role at GE Appliances?	12	home energy management system where we partnered with
13	A When I left, I was the senior director of IT	13	energy companies across the country to we had a
14	programs and business development.	14	product that would take a signal from a utility and
15	Q So what does that mean? What was your	15	would then curb the energy usage of that appliance. I
16	day-to-day job?	16	did that for several years.
17	A The last 12 months that role, my first	17	So I did have some experience working with the
18	responsibility was to implement Oracle ERP across the	18	energy sector from a product perspective.
19	order, ship, and bill processes of the business.	19	Q Was any of that knowledge applied to your work
20	So think about that from the moment that	20	at JEA?
21	someone walks into a Home Depot and buys an appliance	21	A It was discussed and would have been. In the
22	all the way through the time that you pay for it and it	22	year that I was here with what went on, no. But I have
23	gets installed in your home. Every process and every	23	a lot of experience behind the meter, which was
24	system along with that, I was responsible for	24	something that JEA has interest in.
25	implementing into an Oracle solution.	25	Q So did you apply for a job at JEA? Was there
	Page 10		Page 12
1	Page 10 Q You said order, ship, and build?	1	Page 12 a job posting?
1 2	_	1 2	
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3 (Pages 9 to 12)

1	Page 13		Page 15
	Q an IT chief?	1	December.
2	So when you you heard that JEA was looking	2	Q What did Melissa tell you that they were
3	for someone, what happened next that how did you get	3	looking for?
4	in touch with JEA?	4	A Melissa talked to me about the CIO job, asked
5	A An individual in town called me to do a	5	about my interest and my background.
6	screening discussion with me. I assumed they I don't	6	Q Did she tell you about JEA?
7	know how they were involved, but they called me and	7	A She told me they were a utility company in
8	talked to me.	8	Florida.
9	Q Individual in which town? Jacksonville?	9	Q Did she tell you what they wanted from a CIO?
10	A Jacksonville.	10	A We talked about desires to improve operational
11	Q Someone called you. You don't know who it	11	efficiency and to ensure the costs were in line.
12	was?	12	Q Did she talk about the business structure of
13	A I do.	13	JEA and whether there were any plans for change?
14	Q Who was it?	14	A No.
15	A Ricky Caplin.	15	Q Did she tell you that it was a municipally
16	(Discussion off the record.)	16	a municipality-owned utility?
17	BY MR. GRANAT:	17	A I don't remember if Melissa told me that. I
18	Q Who is Ricky Caplin?	18	also did my research about JEA when I got into that part
19	A He's a local CEO of a business here in town.	19	of the process.
20	Q Do you know what business?	20	Q Okay. What happened what was the next step
21	A I don't remember.	21	after you talked to Melissa with working at JEA?
22	Q So you told Jon Leverence you were interested,	22	A I talked to Melissa. I had a follow-up a
23	and then Ricky Caplin called you?	23	second conversation with Melissa on the phone. I then
24	A Yes.	24	had a conversation with Aaron Zahn on the phone.
25	Q And what did Ricky Caplin say to you?	25	I then requested to come down and meet the
	Page 14		Page 16
1	A It was a 15-minute what I would consider kind		
		1	head of HR and the CFO and anyone else that I could and
2	of a screening call. He asked me about my background,	1 2	head of HR and the CFO and anyone else that I could and see the city and see the business. So on that
2 3		1	-
	of a screening call. He asked me about my background,	2	see the city and see the business. So on that
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4 (Pages 13 to 16)

	Page 17		Page 19
1	Q Any kind of changes to the business structure.	1	June board meeting where it's been known as, I guess,
2	A Not that I'm aware no.	2	the doom and gloom presentation.
3	Q So then you came to Jacksonville and you met	3	Was that all a surprise to you?
4	with Melissa and Ryan; is that right?	4	A No.
5	A I met my first interview that day was with	5	Q So when did you first learn about the doom and
6	Angie Hiers. My second one was with Ryan Wannemacher.	6	gloom that JEA was facing?
7	And then I had a brief conversation with Melissa and	7	A April and May after I was hired.
8	Aaron. And then I went to dinner with Melissa and Ryan	8	Q So during your interview process, no one ever
9	that night, and then I flew home the next day.	9	told you or gave you any indication that that doom and
10	Q So in your in-person meetings at JEA, did	10	gloom was in the future?
11	anyone discuss with you or mention the desire to change	11	A No.
12	JEA's business structure in the coming years?	12	Q So when you started at JEA I believe it was
13	A No.	13	March 25th of '19; is that right?
14	Q What does the term "strategic planning" mean	14	A Yes.
15	to you?	15	Q What was your job?
16	A From my previous life, strategic planning was	16	A I was the chief information officer.
17	the process that we did every year where we looked five	17	Q So what were your responsibilities as the CIO
18	years down the road, and we made sure that our business	18	when you started in March of 2019?
19	had a line in what we were trying to do and what	19	A My responsibilities were to run all of our
20	environments had shifted that we had to change in order	20	infrastructure, all of our applications, all of our
21	to be able to be a vibrant company.	21	technology systems that help run the business from a
22	When I got to JEA, that horizon being a	22	corporate side.
23	utility is longer than it was in the consumer products	23	I was not responsible for the operational
24	world that I came from. So what I was used to being a	24	technology that runs the grid or the water system
25	three- to five-year vision, strategic planning here	25	controls, but I was responsible for all other systems.
			, I ,
	Page 18		Page 20
1	looked to be ten years.	1	All of the telecom and the fiber networks as well as all
1 2	looked to be ten years. Q So at JEA, strategic planning is looking out	1 2	_
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2	Q So at JEA, strategic planning is looking out	2	All of the telecom and the fiber networks as well as all of the computers and storage and
2 3	Q So at JEA, strategic planning is looking out ten years? Is that what you're saying?	2 3	All of the telecom and the fiber networks as well as all of the computers and storage and Q Who was responsible for the operational
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2 3 4 5	<ul><li>Q So at JEA, strategic planning is looking out</li><li>ten years? Is that what you're saying?</li><li>A That's what I believe.</li><li>Q When you interviewed at JEA, did anyone that</li></ul>	2 3 4 5	All of the telecom and the fiber networks as well as all of the computers and storage and Q Who was responsible for the operational technology? A That resides in each business. So the energy
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5 (Pages 17 to 20)

	Page 21		Page 23
1	A To run the strategic planning process, be	1	Q And could it be of any area of JEA? Do they
2	responsible for innovation across the business. Those	2	just pick out projects and go and approve processes, or
3	were the two.	3	how does that work? How are they assigned jobs?
4	Q Besides you, did he have any other direct	4	A There is a process where we actually
5	reports?	5	recently changed it, but a process where they engage
6	A Yes.	6	directly with the senior leaders to understand their
7	Q Who?	7	pain points in their organizations. And then through
8	A The black belt organization. First name was	8	the six sigma methodology which I had a lot of
9	Kurt. I don't remember the person's last name. They no	9	background in GE with they then kick off various
10	longer work for JEA was the director of them.	10	DMAIC and DMADV and DFSS projects to help find
11	Q Okay. Other than the black belts and IT, did	11	improvements.
12	he have any other departments that were under his	12	Q So who in your department supervised the black
13	responsibility?	13	belt program?
14	A No.	14	A So Steve Selders was the director that the
15	Q Now, earlier you told me that Julio left in	15	black belts got put underneath when Kurt I don't
16	July of '19. Do you know why Julio left?	16	remember his last name left. The manager of the
17	A I do not.	17	black belts is Brian Hancher. He reports to Steve
18	Q Do you know if he left voluntarily or if he	18	Selders.
19	was terminated?	19	Q Do you have any six sigma training?
20	A I do not directly know, no.	20	A Yes.
21	Q Do you know indirectly? What have you heard?	21	Q Do you have a belt?
22	A I know he got popped in the system, so I	22	A Yes.
23	felt I thought he was let go.	23	Q What belt are you?
24	Q What does that mean, "popped in the system"?	24	A I am green belt certified, and I am black belt
25	A It's a process when kind of what happened	25	trained.
	Dama 22		Demo 24
	Page 22		Page 24
1	to me three weeks and one day ago. He did he was	1	Q Okay. So you said that you took over the
2	here one day and gone the next, so I just assumed he was	2	black belts. You also took over the innovation, but not
2 3	here one day and gone the next, so I just assumed he was asked to leave.	2 3	black belts. You also took over the innovation, but not the strategic planning part of Julio's job; is that
2 3 4	here one day and gone the next, so I just assumed he was asked to leave. Q Okay. Do you know what Julio Romero's	2 3 4	black belts. You also took over the innovation, but not the strategic planning part of Julio's job; is that right?
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6 (Pages 21 to 24)

	Page 25		Page 27
1	celebrate it.	1 by 20 j	percent, and then I was hoping to be able to
2	Q Did you get a salary increase when you took on		the powers that be that I could reinvest it in
3	those new responsibilities?		more projects for the business.
4	A No.		Okay. When you say spend it on growing and
5	Q Did you move offices or have a title change or		orming the business, tell me what that means in
6	anything?		ntext of a municipally owned utility.
7	A No title change. I did move offices, because		Yeah. So those terms are getting mixed up in
8	I asked to.		s JEA right now. Those terms are straight from
9	Q Did you take Julio's office?		r playbook. So you can go look them up it in
10	A I did.		r's playbook. It is a conversation around types
11	Q Were you on the 16th floor to start?		nd for IT effort. That's all that was. There was
12	A Yes.	-	g else behind it.
13	Q And so you remained on the 16th floor		One of the ways that Gartner breaks up IT
14	A Yes.		is grow, transform, and run. Okay? The way they
15	Q and just moved somewhere else?	15 look at	t that is, is run keeping the lights on.
16	A Yes.	16 Ironica	ally, we're an electric company, but keeping the
17	Q Where was your second office in relation to	17 lights of	on; that if you did nothing else, you had to do
18	Aaron Zahn's office?	18 that to	run your business. That's why it's called run.
19	A So if the building was a box, if Aaron was in	19	Grow is when you take existing applications,
20	the north corner, I would have been in the west corner.	20 existin	g technology that the company has, and you make
21	Q Okay. And where was your first office in that	21 it bette	r. You make it more productive, but you use
22	box?	22 what y	ou have already today in the model that you have
23	A I actually had three. So my very first office	23 today.	
24	was what was now a conference room	24	Transform is when you then bring in technology
25	Q Okay.	25 that is	for things we've never done before. An example
	Page 26		Page 28
1		1 of tran	
1 2	A across from Deryle Calhoun, Steve McInall,		sform that JEA was looking at when I got here was
	A across from Deryle Calhoun, Steve McInall, and Caren Anders. And then I got moved to the office	2 they ha	sform that JEA was looking at when I got here was ave an application that they had a pilot of users
2	A across from Deryle Calhoun, Steve McInall,	<ul><li>2 they hat</li><li>3 that co</li></ul>	sform that JEA was looking at when I got here was ave an application that they had a pilot of users uld understand their daily usage of their energy,
2 3	A across from Deryle Calhoun, Steve McInall, and Caren Anders. And then I got moved to the office right next to Julio's, and that's where I was until	<ul><li>2 they hat</li><li>3 that co</li><li>4 and the</li></ul>	sform that JEA was looking at when I got here was ave an application that they had a pilot of users
2 3 4	A across from Deryle Calhoun, Steve McInall, and Caren Anders. And then I got moved to the office right next to Julio's, and that's where I was until Julio left.	<ul> <li>2 they hat</li> <li>3 that co</li> <li>4 and the</li> <li>5 save.</li> </ul>	sform that JEA was looking at when I got here was ave an application that they had a pilot of users ould understand their daily usage of their energy, en we would give them ideas in which they could
2 3 4 5	<ul> <li>A across from Deryle Calhoun, Steve McInall,</li> <li>and Caren Anders. And then I got moved to the office</li> <li>right next to Julio's, and that's where I was until</li> <li>Julio left.</li> <li>Q During your December interview, when you were</li> </ul>	<ul> <li>2 they hat</li> <li>3 that co</li> <li>4 and the</li> <li>5 save.</li> </ul>	sform that JEA was looking at when I got here was ave an application that they had a pilot of users ould understand their daily usage of their energy, en we would give them ideas in which they could And that's a transformative technology because it a part of the business that JEA had been in
2 3 4 5 6	<ul> <li>A across from Deryle Calhoun, Steve McInall, and Caren Anders. And then I got moved to the office right next to Julio's, and that's where I was until Julio left.</li> <li>Q During your December interview, when you were asked what your goals were, you said one of the goals</li> </ul>	<ul> <li>2 they ha</li> <li>3 that co</li> <li>4 and that</li> <li>5 save.</li> <li>6 wasn't</li> <li>7 before.</li> </ul>	sform that JEA was looking at when I got here was ave an application that they had a pilot of users ould understand their daily usage of their energy, en we would give them ideas in which they could And that's a transformative technology because it a part of the business that JEA had been in
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	<ul> <li>A across from Deryle Calhoun, Steve McInall, and Caren Anders. And then I got moved to the office right next to Julio's, and that's where I was until Julio left.</li> <li>Q During your December interview, when you were asked what your goals were, you said one of the goals you were given was and I'm just paraphrasing to look across all of IT's spend and to try to drive JEA to less spending on running operations and more spending on growing and transforming the business.</li> <li>A Uh-huh.</li> <li>Q Do you recall that?</li> <li>A I do.</li> <li>Q Who gave you that goal?</li> <li>A Julio.</li> <li>Q How was it explained to you to do that, to focus on spending less on operations and more on growing and transforming the business.</li> <li>A In addition in that transcript, I was given a 20 percent cost-out target day one from operations, which is running the business. The conversation on the growing and transforming was what do you do with that</li> </ul>	2they had3that co4and that5save.6wasn't7before.839exactly10Q11A12Q13Q14A15a consult16the IT17use the1819inherit20good to21Q23try to to	sform that JEA was looking at when I got here was ave an application that they had a pilot of users ould understand their daily usage of their energy, en we would give them ideas in which they could And that's a transformative technology because it a part of the business that JEA had been in So in that statement, in those words, that's y what it means from an IT perspective. So you referred to Gartner in your Uh-huh. December interview and today. Can you tell me what that is? Sure. Gartner is we pay a license. It is ulting firm, if you will, a research firm, across industry, across a lot of industries, where you em for expertise. JEA had been a customer for years. I ed the license when I came here. It's a very tool I'd used also at GE and other companies. Okay. So I'm just trying were you ever the assignment by Julio or anyone else at JEA to

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	Page 29		Page 31
1	direction that he wanted to take JEA in, new innovative	1	A No.
2	ideas?	2	Q in Jacksonville for your interview?
3	A Yes.	3	A No.
4	Q What did he tell you his visions were?	4	Q And did you ever know Aaron Zahn before your
5	A There were conversations about a digital	5	first interview at JEA?
6	utility, about leveraging our data to be able to	6	A No.
7	automate things. You know, there was conversations as	7	Q So when Julio left and you got the innovation
8	is currently being worked through Councilman Boylan,	8	piece of his job, was his strategic planning function
9	stuff around telecom and could we potentially do more of	9	assigned to someone else?
10	that. Those conversations.	10	A To the team of Aaron, Melissa, Ryan, Herschel.
11	Q Did Aaron ever talk to you about constraints	11	Q But not you?
12	that JEA faced by being a government entity?	12	A No.
13	A Yes.	13	Q Did Julio work a lot with McKinsey when he was
14	Q What did he tell you about the constraints?	14	at JEA?
15	A The conversations with Aaron about this were	15	A Yes.
16	in large group settings of the SLT; going into the June	16	Q Did you continue any of his work with
17	board meetings when we were having conversations around	17	McKinsey?
18	some of the constraints of the government stuff that	18	A Yes.
19	Herschel Vinyard and Lynne Rhode put together for the	19	Q Tell me about what you did with McKinsey when
20	board meeting, I believe, in July. Those were the	20	Julio left.
21	conversations that were had more with Aaron.	21	A At first nothing, because I was not given the
22	No direct conversation with me of Aaron saying	22	strategic planning. As we got further into 2019,
23	any particular constraint.	23	August, September, there were some things that McKinsey
24	Q Was privatization of JEA ever discussed as a	24	needed to get delivered.
25	means around those constraints?	25	And I have a background of vendor management
	Page 30		Page 32
1	A Yes.	1	and holding vendors accountable. And recognized they
2	Q When did you first hear about an idea to	2	weren't delivering, so I stepped in to help push them.
3	privatize JEA?	3	So I forced them to daily update meetings and things. I
4	A Summer of '19, the conversations around	4	really just program-managed them through the remaining
5	potential recapitalization.	5	things that they had to do for Aaron, Melissa, Ryan, and
6	Q Can you be any more specific than summer?	6	Herschel.
7	A The second meeting at Ponte Vedra that I know	7	Q So who were those vendors that you had to
8	there's a ton of data about. Not the first one I	8	daily manage?
9	went to the one in April but the second one. Q Okay. I think there was a June Ponte Vedra	9	A I'm talking about my previous experience in GE; I actually ran a vendor management organization.
10 11	meeting.	10 11	
12	A I think that's right.	12	<ul><li>Q Okay.</li><li>A So I just had experience driving vendors. So</li></ul>
13	Q Was that the first time that you heard about	13	I stepped into it late 2019 to just get them across the
14	privatization of JEA?	14	finish line.
15	A It was preparing for the Scenario 2 stuff,	15	Q Oh, to manage McKinsey?
16	yeah.	16	A Yeah. But I did not what I was trying to
17	Q Do you know, when was the first time you met	17	articulate was, I was not given the task of driving
	Herschel Vinyard?	18	strategic planning. I did not do anything with McKinsey
18	2		when Julio left, outside of anything that anybody in the
18 19	A His first day on the job.	1 19	
18 19 20	<ul><li>A His first day on the job.</li><li>Q Before you talked to Melissa Dykes when she</li></ul>	19 20	
19	Q Before you talked to Melissa Dykes when she	1	SLT was doing.
19 20	Q Before you talked to Melissa Dykes when she called you for your first phone interview, had you ever	20	SLT was doing. I stepped in and drove the final execution of
19 20 21	Q Before you talked to Melissa Dykes when she	20 21	SLT was doing.
19 20 21 22	Q Before you talked to Melissa Dykes when she called you for your first phone interview, had you ever met her or did you know her?	20 21 22	SLT was doing. I stepped in and drove the final execution of McKinsey because they weren't delivering. And quite
19 20 21 22 23	<ul><li>Q Before you talked to Melissa Dykes when she called you for your first phone interview, had you ever met her or did you know her?</li><li>A No.</li></ul>	20 21 22 23	SLT was doing. I stepped in and drove the final execution of McKinsey because they weren't delivering. And quite frankly, Aaron, Melissa, and Ryan, and Herschel weren't

8 (Pages 29 to 32)

10       Q       What were the deliverables?       10       have to pivot?         11       A       So the deliverable that they had to get done       11       A       In March, no.         12       was the strategic plan that they produced. They had been given       12       Q       There was a board meeting in May, May 28th of         13       strategic plan that they produced. They had been given       13       Yes       14       A       I ddi Yes.         14       an additional assignment that I also helped manage and       16       O       And that was the board meeting where they         16       doing it, and that was around the management       17       with that was the was a cound that they indices.         17       M       The ones that were given in Atlanta to -       19       Q       Did you contribute to the status quo         120       Q       Okay.       21       A       the prospective ITN bidders.       21       A       Yes.         121       A       the they ware source manger driving it.       22       Q       What was your contribute to the status quo       presentation?       22       Q       What was the budget meeds or what was the budget meeds or what was the udget needs or what was the udget needs or what was the udget needs or what ware the things that would be happening.       3       So I was given - some o		Page 33		Page 35
2A Probably late August. Ident recail. But it2Do you areal that, the principles behind3was not during - you know, it was later in the year.4A4QWas it alter that yol 2xdb board meeting?4A6Q. So was it - were you driving McKinsey597regarding the TIN process?7March regarding JEA needing to pivot?8AI was driving McKinsey to get the deliverables99QWhat were the deliverables?1011A. So the deliverables?11A12was the strategic plan, which was the - the ten-year12Q13ts but didth - but wasn't engaged with them in15Q14A I didt, Yes.1315Do you know if you attended that meeting?1314A I didt, Yes.141414A I didt, Yes.161615G doing i, and that was around the management15QA duat was around the management16The ones that were given in Allanta to -12QDid you contribute to the status quo12AYes.21AYes.13AYes.21AYes.14H addines?22QWhat was your contribution to the status quo15Projective TIN bidders.21AYes.16Projective TIN bidders.22QWhat was the impact of - or what was the langet needs15AYes.21	1	stepped in to drive McKinsey?	1	that JEA as a business needed to pivot.
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25   response presentation.     25   Q       Why did you ask him that?	
Page 38 Page 4	40
1 A Uh-huh. 1 A Because in my homework, I saw a City that ha	nad
2 Q Do you know what I'm talking about? 2 already looked at potentially selling. I saw a board	
3 A Yes. 3 put in place. I saw an interim CEO put in place and a	a
4 Q Did you present to the board at all in that 4 CEO hired that had a financial background that said to	
5 meeting? 5 me hedge fund and potential financial management	
6 A No. 6 background.	
7 Q Did you contribute at all to the traditional 7 So it looked to me like the board and	
8 utility response presentation? 8 potentially the leadership might want to package this	c
<ul> <li>9 A I contributed to a bit of the TS material.</li> <li>9 because of the work that the City had already</li> </ul>	
	Jy
10     Q     Specifically what was your material that you     10     done. So I just asked the question.       11     contributed?     11     0     What did Again acute you?	
11     contributed?       12     A       13     Q       14     What did Aaron say to you?	
12     A     There was a slide in the appendix I think     12     A     He said he didn't know what the future	
13     it is the June meeting that talked about outsourcing     13     brought. I didn't get a definitive answer.	
14     IT. There might have been a couple of other slides as     14     Q     So that was his response, I don't know what	
15 well. That's the one that gets talked about the most. 15 the future shows; right?	
16QAnd would that suggest that you would reduce16AI don't recall his exact words. I did not get	
17 the number of IT employees at JEA and outsource the 17 a yes or a no.	
18 function? 18 Q Okay.	
19AYes.19AI don't recall his exact words.	
20 Q Do you remember how many employees in a 20 Q After that conversation, did you ever discuss	
21 traditional utility response would be terminated from 21 the sale of JEA or a change in business structure with	
22 JEA's IT department? 22 him between then and the June 25th board meeting?	
23 A I don't recall. 23 A No.	
24QAnd can you just give me a summary of what the24QBefore that June 25th board meeting, did you	1
25overview the overall idea behind the traditional25ever have a conversation regarding either selling or	-

10 (Pages 37 to 40)

1	Page 41		Page 43
	changing JEA's business structure with Herschel Vinyard?	1	packaging up JEA for sale. And you listed a lot of
2	A No.	2	clues, things from your research that made you ask that
3	Q Same question with Ryan Wannemacher.	3	question to Aaron Zahn.
4	A No.	4	And I understand you moved from Kentucky to
5	Q Same question with Melissa Dykes.	5	Jacksonville; is that right?
6	A No.	6	A Yes.
7	Q There was a board meeting on July 23rd. The	7	Q And you moved with your family?
8	non-traditional utility response presentation was given.	8	A Yes.
9	Are you familiar with that presentation?	9	Q And so when you asked Aaron Zahn that question
10	A Yes.	10	and you got a nonanswer from him, did you take it to
11	Q All right. And did you present anything to	11	mean that it was a real possibility that JEA might be
12	the board then?	12	sold?
13	A No.	13	A I don't know. I asked the question in an
14	Q Did you contribute to that presentation?	14	interview from my background, factored it in in my
15	A As I did in the previous ones, the TS	15	overall decision. I don't know.
16	portions.	16	Q You asked the question and he didn't tell you
17	Q And can you just summarize what your	17	no; right?
18	contributions were for the non-traditional response?	18	A I said he didn't tell me yes or no.
19	A Can you repeat the question?	19	Q Would that lead you to believe then that it
20	Q Yes. Can you summarize what your	20	was a possibility that he was planning on selling JEA?
21	contributions were to the non-traditional utility	21	A In the moment, not knowing politics, not
22	response presentation?	22	knowing everything I know now, I didn't put that much
23	A Do you have the presentation that I could see?	23	thought to it. I put the thought that a CEO didn't know
24	Q We could get a copy of it. I don't have it	24	what direction he was going in, and I moved on. I went
25	with me.	25	into the selection saying, hey, if he goes right or
	Page 42		Page 44
1	A Because I don't recall.	1	left, am I willing to be a CIO there, and that's all
2	Q Okay.	2	
_	· ·	2	that went through my mind.
3	(Discussion off the record.)	3	that went through my mind. Q All right. You told me about some Ponte Vedra
3	(Discussion off the record.) (Recess taken from 11:04 a.m. to 11:11 a.m.)		that went through my mind. Q All right. You told me about some Ponte Vedra meetings. Do you remember when the first one was?
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4 5 6	(Recess taken from 11:04 a.m. to 11:11 a.m.) (Exhibit Number 2 was marked for identification.)	3 4 5 6	<ul><li>Q All right. You told me about some Ponte Vedra meetings. Do you remember when the first one was?</li><li>A First one I was at was in April.</li><li>Q And who all was at the April Ponte Vedra</li></ul>
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11 (Pages 41 to 44)

Page 45	Page 47
1 just trying to get things done.	1 Q Did you attend a meeting at Club Continental?
2 Q What was the subject discussed at the April	2 A No.
3 Ponte Vedra meeting?	3 Q In July?
4 A I think status quo scenario I think it's	4 A No.
5 called scenario planning, I think, or status quo. It	5 Q When you left the second Ponte Vedra meeting,
6 was my first introduction. I had only been here a	6 did you were you assigned any action items?
7 couple of weeks, so for me it was largely just	7 A No.
8 listening. I didn't really participate because I was	8 Q Did you attend a meeting at the Dalton Agency
9 just learning.	9 in July?
10 Q And you think they were discussing the status	10 A No.
11 quo that was going to be presented at the May meeting?	11 Q Back up to the June Ponte Vedra meeting. Was
12 A I don't recall if it was we discussed the	12 an ITN discussed at all in that meeting?
13 status quo and the types of things we would do based on	13 A I don't recall.
14 projections. It was kind of a working meeting.	14 Q What about
15 Q Did you take notes at that meeting?	15 A I don't think so.
16 A I think so.	16 Q What about a co-op?
17 Q Do you know where those notes are?	17 A I don't remember.
18 A I don't. They may be in my OneNote.	18 Q What about an IPO, initial public offering?
19 Q Did you take notes digitally or would it have	19 A I don't remember.
20 been on a piece of paper?	20 Q Do you know when the first time you heard the
21 A I did, but I don't remember when I started.	21 phrase "ITN," invitation to negotiate?
22 So I don't remember that meeting.	22 MR. NICHOLS: Just to be clear, in relation to
23 Q Okay. Do you know if you received any	23 this?
24 materials at that April meeting in Ponte Vedra?	2.4 THE WITNESS: So I used procurement quite a
25 A I don't believe so.	25 bit, so you're not wanting to know when the first
Page 46	Page 48
1 Q Were you ever at a meeting at White Oak? 2 A No.	<ol> <li>time I heard about ITN; you're wanting to know</li> <li>about this ITN process?</li> </ol>
<ul> <li>2 A NO.</li> <li>3 Q There was another Ponte Vedra meeting. Do you</li> </ul>	3 BY MR. GRANAT:
4 remember when that was? Was that in June?	4 Q Well, you know, I didn't I was just asking
5 A I think so. There was another Ponte Vedra	5 the question. But if you're saying that you've heard
6 meeting. It was before July. I know the work has been	6 that term throughout your career
7 done. I know a lot of questions from the SIC were	7 A I have.
8 around that. I think it's June.	8 Q Okay. And when's the first time you heard it
9 Q Okay. So tell me about that second Ponte	9 regarding JEA?
10 Vedra meeting. What was the subject of it?	10 A I'll go back to I may have heard it as I
11 A I think it was the continuation of the	11 went to hire people for some work in my early days at
12 scenario planning. So the first one, you know, was	12 JEA as well as they taught me the procurement process.
13 around status quo and the second one was around SQ2 and	13 Q Okay. Well, when's the first time you heard
1	· · ·
14 continuing down the strategic planning scenario process.	1 4 of the ITN that is regarding selling JEA?
	<ul> <li>of the ITN that is regarding selling JEA?</li> <li>A Okay. I don't remember. I think it was I</li> </ul>
14 continuing down the strategic planning scenario process.	
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	Page 49		Page 51
1	your interview, please.	1	Q Did you know at that time during that meeting
2	A It was with Angie Hiers when we talked	2	what the PUP was?
3	about when I got the offer and we talked about the	3	A I knew what the PUP stood for.
4	compensation portions. She said to me that Aaron was	4	Q What did the PUP stand for?
5	doing some creative things with the board, and the board	5	A Performance unit plan.
6	was and the compensation committee was looking at	6	Q Okay. You knew what the acronym was.
7	modernizing the way compensation was.	7	A I knew nothing about the plan.
8	I came from a situation that had short-term	8	Q Did you listen to Ryan Wannemacher explain it
9	and long-term incentives, so I was very comfortable with	9	at that meeting?
10	those terms. I actually even delayed a little bit on	10	A Yes.
11	accepting to understand how the compensation committee	11	Q Was that the first time that you understood
12	meeting in January of '19 went where they had committed	12	how it would work or that you learned how it would work?
13	to potentially pursuing an LTI.	13	A I don't remember if it was brought up before
14	Q Was that conversation with Angie Hiers in	14	that or not.
15	December?	15	Q Who created the PUP?
16	A No. It was in January.	16	A To my knowledge, Aaron.
17	Q In January.	17	Q So tell me what your knowledge is that leads
18	And Angie said that Aaron was and the board	18	you to believe that Aaron created it.
19	were deciding whether to do an LTI?	19	A Because I reported to Aaron starting in July,
20	A Yes. I believe so. Yes.	20	and I was never talked about it. There was a lot of
21	Q Did you did you watch that compensation	21	work going on, so and it didn't include me.
22	committee meeting?	22	So I just assumed Aaron was working on it. I
23	A I did not.	23	don't know if he pulled in other members of the team. I
24	Q So how did you learn of the outcome of that	24	just I had I was not involved.
25	compensation committee meeting?	25	Q Did you hear of any other types of long-term
	Page 50		Page 52
1	A I asked Angie.	1	incentive plans being considered at JEA other than the
	A Taskeu Aligie.	1 ±	incentive bians being considered at JEA other than the
2	O What did Angie tell you after that meeting?	2	
2	Q What did Angie tell you after that meeting?	2	PUP?
3	A That they had approved the concepts, the	3	PUP? A No.
3 4	A That they had approved the concepts, the principles of the 50 percentile from a salary	3 4	PUP? A No. Q Do you know if any attorneys ever advised
3 4 5	A That they had approved the concepts, the principles of the 50 percentile from a salary perspective and then the STI and the LTI.	3 4 5	PUP? A No. Q Do you know if any attorneys ever advised against the PUP?
3 4 5 6	<ul><li>A That they had approved the concepts, the principles of the 50 percentile from a salary perspective and then the STI and the LTI.</li><li>Q Did Angie give you any details of what the LTI</li></ul>	3 4 5 6	PUP? A No. Q Do you know if any attorneys ever advised against the PUP? A How do you want me to answer that? As of
3 4 5 6 7	A That they had approved the concepts, the principles of the 50 percentile from a salary perspective and then the STI and the LTI. Q Did Angie give you any details of what the LTI would look like?	3 4 5 6 7	PUP? A No. Q Do you know if any attorneys ever advised against the PUP? A How do you want me to answer that? As of July 23rd or as of now? I have gotten a lot of data in
3 4 5 6 7 8	<ul><li>A That they had approved the concepts, the principles of the 50 percentile from a salary perspective and then the STI and the LTI.</li><li>Q Did Angie give you any details of what the LTI would look like?</li><li>A No.</li></ul>	3 4 5 6 7 8	PUP? A No. Q Do you know if any attorneys ever advised against the PUP? A How do you want me to answer that? As of July 23rd or as of now? I have gotten a lot of data in my role
3 4 5 6 7 8 9	<ul> <li>A That they had approved the concepts, the principles of the 50 percentile from a salary perspective and then the STI and the LTI.</li> <li>Q Did Angie give you any details of what the LTI would look like?</li> <li>A No.</li> <li>Q Did she tell you how long the term would be on</li> </ul>	3 4 5 6 7 8 9	PUP? A No. Q Do you know if any attorneys ever advised against the PUP? A How do you want me to answer that? As of July 23rd or as of now? I have gotten a lot of data in my role Q I'm asking you as of right now, do you know if
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13 (Pages 49 to 52)

	Page 53	Page 55
1	Q Were you involved with the drafting or were	1 Q Did you ever have a discussion with Melissa,
2	you	2 Ryan, or Herschel about how PUP units would be
3	A No.	3 allocated?
4	Q And that would include the ITN, the co-op, the	4 A No.
5	IPO. It would include the pension reform	5 Can I clarify something?
6	A Uh-huh.	6 Q Yes.
7	Q the senior leadership team contract.	7 A The one discussion that was had was around the
8	A Uh-huh.	8 annual review process, about concepts of the rating that
9	Q And what was the other one?	9 you got may impact the amount, which we I knew
10	A The retention agreement?	10 nothing of and that there was a conversation that they
11	Q So you didn't have any involvement with the	11 were going to have the entire SLT team be "meets" for
12	review or drafting or discussions about any of those	12 our annual performance review. And that's it. That's
13	resolutions that passed on July 23rd?	13 all.
14	A So the original question was did I have	14 Q When was that conversation?
15	anything to do with drafting it. My answer was no. Did	15 A During the annual review process, so I'm
16	I was I given a version of the SLT contract and read	16 assuming late September, because that happens at the end
17	it? I believe so.	17 of the fiscal year.
18	Q Okay.	18 Q And who was in that conversation?
19	A But I didn't contribute to it.	19 A It was a general conversation. Actually, it
20	Q Okay. Any of the other resolutions, did you	20 was in my performance review with Aaron where he told
21	contribute	21 me and everybody else had been told that, I think, by
22	A I didn't contribute to any of them.	22 their boss.
23	Q Okay. What did you review any of the	23 Q Was there anyone else there besides you and
24	resolutions that were passed on July 23rd before the	24 Aaron?
25	July 23rd board meeting?	25 A No.
	Page 54	Page 56
1	-	1 O So Aaron discussed with you well, let me
1 2	A I don't believe so. No.	1 Q So Aaron discussed with you well, let me 2 ask you.
1 2 3	<ul><li>A I don't believe so. No.</li><li>Q So the memo, the legal memo that you were kind</li></ul>	2 ask you.
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14 (Pages 53 to 56)

	Page 57		Page 59
1	I had, that's what I believed.	1	Q Did you ever see any SLT member write an
2	Q Did Aaron mention anything else about the	2	explanation of the PUP or its valuation on a whiteboard?
3	allocation of PUP units?	3	A No.
4	A No.	4	Q Have you ever seen a photograph of that?
5	Q Did he say anything about the number of units	5	A No.
6	that SLT would get as opposed to any other class of	6	Q We have information that there was a
7	employee?	7	calculation of the PUP values on a whiteboard by
8	A No. No. I'm sorry.	8	someone, and there's a photograph of it that exists.
9	Q Did you know who would decide on the PUP	9	Have you heard of that?
10	allocations?	10	A No.
11	A No.	11	Q Do you know whether it exists or not?
12	O Whose decision it would be?	12	A No.
13	A I assumed who it was, but no, I did not know.	13	(Exhibit Number 3 was marked for
14	Q What did you know before the PUP was canceled?	14	identification.)
15	What did you know about how much the PUP would be worth?	15	BY MR. GRANAT:
16	A Nothing.	16	Q The next exhibit, this is your offer letter
17	Q Before it was canceled, were you aware that	17	for your job at JEA. Just take a minute to review it,
18	you would actually have to purchase shares?	18	please. Okay?
19	A Yes.	19	A (Nods head.)
20	Q How did you learn that?	20	Q Exhibit 3, is this your offer letter?
21	A Through various conversations or there was	21	A Yes.
22	even conversations within our peer set because	22	Q Okay. And my question is, were there any
23	several of us did not know anything about it asking	23	benefits or compensation offered or promised to you that
24	questions of how is this going to work.	24	aren't reflected in your offer letter?
25	I believe we were told the outline of the	25	A No.
		<u> </u>	
	Page 58		Page 60
1	program was going to be some kind of purchase in. I	1	Q So you were never promised a long-term
2	don't remember where that was talked about, but we at	2	incentive plan?
3	least knew that concept.	3	A No.
4	On a personal note, there was even a moment	4	Q We talked about it was just you were told
5	where I kind of wanted, from a financial planning	5	that it was a possibility?
6	perspective, to understand it, because some people might	6	A Uh-huh.
7	be able to scratch a certain size check no problem; some	7	Q Yes?
8	people might not. And I didn't know what I was going to	8	A Yes. Yes.
9	be offered or allowed. I thought I might get that	9	Q So I want to ask you about the ITN now.
10	clarity during the annual preview process, and it didn't	10	A Okay.
11	happen.	11	Q And the ITN, that was requesting bidders to
12	Q Did you ask Aaron for more clarity regarding the PUP?	12	purchase all or part of JEA. Just so we're clear on
13 14	A No, because I assumed when it was going to	13 14	what ITN process we're talking about. Okay? A Yes.
14	A No, because I assumed when it was going to come down, I'd be told.	15	
	come down, ru oc told.	1 1	Q What was your understanding of what the
	O Did you ever hear Aaron Zahn discuss the value	16	nurnose of that ITN was?
16	Q Did you ever hear Aaron Zahn discuss the value of the PUP?	16 17	purpose of that ITN was? A My understanding was it was part of the
16 17	of the PUP?	17	A My understanding was it was part of the
16	of the PUP? A No.	17 18	A My understanding was it was part of the overall process that was going to produce one of
16 17 18	of the PUP? A No. Q What about Melissa, Ryan, or Herschel?	17	A My understanding was it was part of the overall process that was going to produce one of three five different options that would be taken to
16 17 18 19	of the PUP? A No. Q What about Melissa, Ryan, or Herschel? A No.	17 18 19	A My understanding was it was part of the overall process that was going to produce one of
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16 17 18 19 20 21	of the PUP? A No. Q What about Melissa, Ryan, or Herschel? A No.	17 18 19 20 21	A My understanding was it was part of the overall process that was going to produce one of three five different options that would be taken to the board. The board would then make a selection from those options; the ITN being one of them. And then
16 17 18 19 20 21 22	of the PUP? A No. Q What about Melissa, Ryan, or Herschel? A No. Q Did you know before the PUP was canceled that Lynne Rhode and Miriam Hill would have been participants	17 18 19 20 21 22	A My understanding was it was part of the overall process that was going to produce one of three five different options that would be taken to the board. The board would then make a selection from
16 17 18 19 20 21 22 23	of the PUP? A No. Q What about Melissa, Ryan, or Herschel? A No. Q Did you know before the PUP was canceled that Lynne Rhode and Miriam Hill would have been participants of the PUP?	17 18 19 20 21 22 23	A My understanding was it was part of the overall process that was going to produce one of three five different options that would be taken to the board. The board would then make a selection from those options; the ITN being one of them. And then depending on what they selected, then the City Council

15 (Pages 57 to 60)

	Page 61		Page 63
1	Q What work did you do on the ITN process?	1	A I did not.
2	A I collected various pieces of data that went	2	Q Do you know what SLT members did work on the
3	into the data room around IT contracts and fiber runs	3	co-op?
4	and very technical things in my job spec from that	4	A I don't. Ted Hobson played an advisory role.
5	perspective.	5	I don't remember if that was with the co-op or the IPO.
6	I participated in the management presentation	6	And I think he was just there to be an adviser, kind of
7	that happened in Atlanta and here in Jacksonville. I	7	look over what the banks were doing. I don't believe he
8	helped program manage finishing some of the work that	8	did any work.
9	McKinsey did to help with finalize some of that	9	Q All right. What were the IPO options that
10	material.	10	were being explored?
11	Q Okay. What other senior leadership team	11	A Sure. The IPO was if we spun off the utility
12	members worked on the ITN?	12	as a privately owned company by itself, much like any
13	A Well, with how I just described my	13	other IPO would be.
14	responsibilities, I think all the members of the SLT did	14	Q Did you do any work regarding the IPO?
15	similar things in their respective areas.	15	A I did not.
16	Q Who was heading the ITN process for JEA?	16	Q Do you know what other SLT members worked on
17	A From a procurement perspective, that was John	17	the IPO?
18	McCarthy and Jenny McCollum. I think internally, I	18	A I do not, other than my comment.
19	think a lot of it was being done by Aaron, Melissa,	19	Q Do you feel like equal attention was given by
20	Herschel, and Ryan.	20	JEA to the co-op and IPO options as it was the ITN?
21	Q What's your understanding of what the purpose	21	A I don't know. I don't know. Again, all three
22	of the co-op, I guess, that was being looked at?	22	were being worked on. I mean, if you're asking me was
23	A Purpose?	23	equal amount of hours given to I don't have the
24	Q Yes.	24	details to know.
25	A So my understanding, again, back to the five	25	Q You don't know who at JEA was working on the
	Page 62		Page 64
1	options, was this was a I thought this was a	1	co-op or the IPO, what you said; right?
2	methodical process we were going through.	2	A I don't.
3	Q Okay.	3	Q But you said that you think everybody, as far
4	A That we were going to provide five different	4	as the SLT members, contributed in some way to the IPO?
5	options back to the board, and the co-op being one of	5	A Yes.
6	them.	6	Q Who from JEA had access to the data rooms for
7	Q Right. So what was the co-op?	7	the ITN?
8	A The co-op was if you turned JEA into a	8	A Different people at different times. During
9	cooperative where it's owned by the community, not like	9	the initial loading of data, each member I believe
10	an IPO, but by the community itself I don't know a	10	every SLT member had access, and a lot of SLT members
11	lot of details about co-ops, so I don't want to misstate	11	had a member of their team that was tasked with helping
12	something. But my understanding was that was a	12	to load documents, so they were also given access.
13	notantial antian of gatting rid of some of the	13	So a vast number of people within JEA when we
	potential option of getting rid of some of the		
14	government constraints that we heard about during the	14	were doing the initial feeding.
14 15	government constraints that we heard about during the June board meeting.	15	were doing the initial feeding. Q Did you have access
14 15 16	government constraints that we heard about during the June board meeting. Q Did you view the ITN as a sale to make JEA	15 16	were doing the initial feeding. Q Did you have access A I did.
14 15 16 17	government constraints that we heard about during the June board meeting. Q Did you view the ITN as a sale to make JEA private?	15 16 17	<ul><li>were doing the initial feeding.</li><li>Q Did you have access</li><li>A I did.</li><li>Q to the data room?</li></ul>
14 15 16 17 18	government constraints that we heard about during the June board meeting. Q Did you view the ITN as a sale to make JEA private? A The ITN was one of the five options that was	15 16 17 18	<ul> <li>were doing the initial feeding.</li> <li>Q Did you have access</li> <li>A I did.</li> <li>Q to the data room?</li> <li>A I did.</li> </ul>
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	Page 65		Page 67
1	I believe J.P. Morgan kind of ran shotgun over a lot of	1	Q So just give me a summary of what your
2	that. Internally, Steve McInall was kind of the head	2	presentation was about at the ITN presentations.
3	SLT person to really just corral us together and try to	3	A Oh, man. I wish I had it in front of me.
4	get us to get documents. He didn't do anything in the	4	MR. GRANAT: I think I have it. Is this it?
5	system. That was done by Intralinks and J.P. Morgan.	5	It's called Confidential Information Presentation,
6	Q Do you know anything about a data room being	6	Project Scampi? And let me just mark it.
7	cleaned up after the ITN was canceled?	7	(Exhibit Number 4 was marked for
8	A No.	8	identification.)
9	Q Do you know what that means, a data room was	9	MR. GRANAT: Gene, I'm going to give you a
10	cleaned up?	10	copy of this, but let you know that
11	A So the reason I answer no is because you said	11	MR. NICHOLS: I'll give it back.
12	after the ITN was canceled. There was a time that we	12	MR. GRANAT: there's trade secret
13	were restructuring the data room, cleaning it up to	13	information
14	potentially create a clean room very common in	14	MR. NICHOLS: I'll give it back when we're
15	transactions like this where the bidders would have	15	done.
16	to sign NDAs and only a certain amount of information	16	THE WITNESS: This doesn't look like the
17	would be there.	17	presentation. I don't believe this is the
18	So there were times we had dumped all of	18	management presentation.
19	this data in a data room, just pure putting it all	19	(Discussion off the record.)
20	there, and then I believe if that's what you're	20	BY MR. GRANAT:
21	referring to clean up there was an effort at one	21	Q Well, do you know what this is, Exhibit 4?
22	point in time where J.P. Morgan was working to put it	22	A It's a whole collection of data that we worked
23	then into more of a deal structure, kind of have a clean	23	on for
24	room area. I don't believe we ever got far enough into	24	Q And let me just call to your attention, on
25	that, but that was being done.	25	every one of these pages there's a water mark on the top
20	nin, out that was comp done.		every one of mose pages mores a water mark on me top
	Page 66		Page 68
	rage ee		
1	Q Was anything deleted during that clean-out?	1	and bottom. It says Confidential, and then it has your
2	A Possibly. And there were times when documents	2	and bottom. It says Confidential, and then it has your name
2 3	A Possibly. And there were times when documents got loaded to multiple places, and we did not have	2 3	and bottom. It says Confidential, and then it has your name A Yeah.
2 3 4	A Possibly. And there were times when documents got loaded to multiple places, and we did not have delete capability. So there were times we would say to	2 3 4	and bottom. It says Confidential, and then it has your name A Yeah. Q and then the date, November 11th I think
2 3 4 5	A Possibly. And there were times when documents got loaded to multiple places, and we did not have delete capability. So there were times we would say to Steve McInall, hey, this document's in two places. So	2 3 4 5	and bottom. It says Confidential, and then it has your name A Yeah. Q and then the date, November 11th I think it's November 11, 2019. It's very hard to read.
2 3 4 5 6	A Possibly. And there were times when documents got loaded to multiple places, and we did not have delete capability. So there were times we would say to Steve McInall, hey, this document's in two places. So it would get deleted. So I think there would be records	2 3 4 5 6	and bottom. It says Confidential, and then it has your name A Yeah. Q and then the date, November 11th I think it's November 11, 2019. It's very hard to read. A Uh-huh. Which what that means is I took it
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17 (Pages 65 to 68)

	Page 69		Page 71
1	with this term. This was part of what I was helping	1	Q So not necessarily a sale, but some structural
2	program manage McKinsey to finish with the banks. This	2	change?
3	turned into the management presentation.	3	A Yes.
4	Q All right. Is there any part of Exhibit 4,	4	Q But when you first saw or heard the "frog in
5	the SIP, something that you contributed?	5	the pan" presentation, was there also talk of
6	A To ensure that I'm complete, I'm going to look	6	recapitalization at that time?
7	at every one of these slides, so everybody relax.	7	A No.
8	(Recess taken from 12:00 p.m. to 12:38 p.m.)	8	Q What did you think when you heard this "frog
9	BY MR. GRANAT:	9	in the pan" presentation?
10	Q Before we took a break, you had reviewed	10	A I thought it was outlining the data from the
11	Exhibit 4, and just for the record, my question was,	11	strategic planning process, this the status quo. I
12	what parts of Exhibit 4 did you contribute to. And you	12	thought it was articulating some of the headwinds that
13	gave me a list of pages numbers. I'll just read them	13	that exercise was showing going forward, and that we, as
14	for the record: 38, 86, 99, 104, 106, 125 and 128.	14	a leadership team and as a business, needed to be able
15	Thank you for that.	15	to navigate those waters.
16	A Uh-huh.	16	Q Did you ever hear Aaron Zahn make a statement
17		1	-
18	Q Did you ever hear Aaron Zahn make his "frog in the pan" presentation?	17 18	that if JEA were sold or recapitalized that the senior leadership team would be taken care of or anything to
19	A Yes.	19	that effect?
20	Q Did you assist in creating that presentation	20	A Not those words, no.
20	at all?	1	· · · · ·
22	A No.	21 22	
23			A My exception to that is he put in place a
	Q What was the point of the "frog in the pan"	23	retention agreement for all employees and the senior
24	presentation?	24	leadership team is a part of that.
25	A To inform everybody employees, community,	25	Q I assume you're referring to the retention
	Page 70		Dama 70
	2 4 9 0 7 0		Page 72
1	board to inform people of some of the shifts in the	1	agreement that was given to all employees that
1 2	_	1 2	-
	board to inform people of some of the shifts in the		agreement that was given to all employees that
2	board to inform people of some of the shifts in the utility industry.	2	agreement that was given to all employees that guarantees basically a one-year salary paid over three
2 3	board to inform people of some of the shifts in the utility industry. Q When did you first hear the "frog in the pan"	2 3	agreement that was given to all employees that guarantees basically a one-year salary paid over three years?
2 3 4	<ul><li>board to inform people of some of the shifts in the utility industry.</li><li>Q When did you first hear the "frog in the pan" presentation?</li></ul>	2 3 4	agreement that was given to all employees that guarantees basically a one-year salary paid over three years? A Uh-huh.
2 3 4 5	<ul><li>board to inform people of some of the shifts in the utility industry.</li><li>Q When did you first hear the "frog in the pan" presentation?</li><li>A Can I ask you a clarifying question? Was that</li></ul>	2 3 4 5	agreement that was given to all employees that guarantees basically a one-year salary paid over three years? A Uh-huh. Q Yes?
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18 (Pages 69 to 72)

	Page 73		Page 75
1	Q Sure.	1	contracts?
2	Did you ever hear Aaron Zahn say words to the	2	A I don't recall if employment contracts
3	effect that if there if JEA were sold or	3	themselves were talked about. I do recall just a
4	recapitalized, there would be a transfer of a large	4	conversation about the SLT.
5	amount of money and some of that money could be used to	5	Q Was the retention agreement discussed at that
6	fund a long-term incentive plan?	6	June Ponte Vedra meeting?
7	A I do not recall a conversation where he said	7	A I don't recall. It may have been.
8	there would be a large amount of money transferred. I	8	Q Do you know when you first knew that you were
9	do not recall that.	9	going to be offered an employment contract?
10	Q Okay. It's been reported to us by multiple	10	A Somewhere between June and July. I don't
11	people that that statement was made at one of the Ponte	11	remember.
12	Vedra meetings.	12	Q Did you know before the July 23rd board
13	You didn't hear that?	13	meeting that you were going to be offered an employment
14	A So at a Ponte Vedra meeting and maybe it's	14	contract?
15	the choice of words there was a conversation around	15	A As I mentioned earlier, I had read a version
16	what may happen, and then I brought up the retention	16	of it, but I didn't contribute to it.
17	agreement discussion and the contracts. That's what I	17	Q Who gave you the version of your employment
18	remember concepts being talked about in that meeting.	18	was this your employment contract or anyone else's?
19	Q At the Ponte Vedra meeting?	19	A I think it was mine because they were
20	A Yes.	20	specific.
21	Q All right. Let me ask you then. Was there a	21	Q Who gave you a copy of your or of the
22	discussion of the concept of what would happen to an LTI	22	employment contract that you saw before the July 23rd
23	plan if there was a sale or a recapitalization?	23	board meeting?
24	A I don't recall. Maybe. I don't recall.	24	A I don't know if it was Jon Kendrick or Aaron
25	Q So tell me about the discussion at the Ponte	25	or Melissa. I don't remember who gave it to me.
	Page 74		Page 76
1	Vedra meeting regarding the retention agreements or the	1	Q Was it emailed to you?
2	contracts.	2	A No. I think it was placed on my desk.
3	A There was a conversation about very much	3	Q Did you negotiate your contract?
4	wanting to take care of employees. And I remember that	4	A No.
5	conversation and I remember actually being very shocked,	5	Q It just appeared on your desk with the terms
6	because having gone through a previous sale in another	6	that are in it presently?
7	life, they didn't take care of the employees like the	7	A Yes.
8	conversation we were having about taking care of all	8	Q Did you ask any questions about the contract?
9	employees. I remember that being talked about.	9	A Yes.
10	And then I remember the conversations about	10	Q What questions did you ask and who did you ask
11	the senior leadership team being needed through any type	11	them to?
12	of process which is very normal out in the business	12	A I think I asked Jon Kendrick. I magically got
13	world and how some of that would be structured. I	13	a \$50-a-month increase in business expenses as compared
14	don't recall a conversation about the long-term	14	to my offer letter. That's all I asked about.
15	incentive, but it may have happened. I don't recall.	15	Q Did he give you an explanation for that?
16	Q All right. And just to set the stage here.	16	A No, other than yes.
17	This was the June Ponte Vedra meeting that was just the	17	Q Were you surprised that you got an employment
18	SLT team without McKinsey; is that right?	18	contract?
19	A Yes.	19	A No.
20 21	Q And so there was a discussion about a possible	20 21	Q Were you expecting one?
21	recapitalization in some form and that all the employees would be taken care of?	21	A No.
22	A I believe so.	22	Q Did you hear any other SLT members express surprise that they were given contracts?
23	Q At that June Ponte Vedra meeting, was it	23	A Not to me.
- 7	$\sqrt{2}$ A that june i onto voula incetting, was it	L 24	A NOT WHIC.
25	-	25	O I'm going to back up a minute to your work
25	discussed that the SLT members would be given employment	25	Q I'm going to back up a minute to your work,

19 (Pages 73 to 76)

	Page 77		Page 79
1	and I guess you described pushing McKinsey to finish	1	strategic plan process?
2	their ten-year strategic plan project.	2	A After getting my hands on some of the
3	If I remember correctly, you told me that you	3	contracts, I think they I think in late 2018 they
4	were pushing them to finish and it was around September,	4	started to pick a vendor, but I don't know exactly when
5	did you tell me? August, September?	5	they started. I wasn't here.
6	A I said it was towards the end of the year.	6	Q Okay. I'm going to ask you about JEA's
7	Q Okay. It was definitely after the	7	records production for the SIC requests now.
8	July 23rd	8	There was an initial very large written
9	A Yes.	9	request for documents from the SIC provided to JEA. Are
10	Q board meeting?	10	you familiar with that?
11	Did you ever have any conversations with	11	A Yes.
12	Melissa Dykes or Aaron Zahn before that July 23rd	12	MR. GRANAT: And just for reference, I'm going
13	meeting that the ten-year strategic plan wasn't	13	to mark that request as Exhibit 5.
14	finished?	14	(Exhibit Number 5 was marked for
15	A Yes.	15	identification.)
16	Q And what was the discussion about how JEA	16	BY MR. GRANAT:
17	would be providing recommendations to the board for the	17	Q When the initial when Exhibit 5, the
18	future before the ten-year strategic plan was finished?	18	initial
19	A Can you rephrase that again?	19	A I thought it was in early March, but yes.
20	Q Yeah.	20	Q When the initial SIC document request was made
21	What were the conversations between you and	21	and sent to JEA, can you tell me the process that was
22	Melissa and Aaron or whoever else discussed the fact	22	started by JEA in how to respond to this?
23	that the ten-year strategic plan wasn't finished, yet	23	A Yes.
24	the SLT was going forward and making recommendations to	24	Q Okay. Will you tell me?
25	the board anyways?	25	I got to tell you, Shawn, we're asking you to
		<u> </u>	
	Page 78		Page 80
1	A I didn't have any conversations about it not	1	come forward with information here, and you're answering
2	being done, even though we talked to the board. I think	2	my questions laser-focused and that's fine if that's how
3	that was your question.	3	you want to do it, but it would speed things up if you
4	Q Did you find it odd that the SLT and Aaron	4	would just answer the questions for us.
5	were making recommendations to the board on July 23rd	5	A So you're asking about the process that we
6	when the ten-year strategic plan wasn't completed?	6	went through. My team being the owners of many systems
7	A At the time, no, I didn't, because it was part	7	that contain a lot of data, we immediately jumped into
8	of a process. And I don't yeah.	8	trying to understand the 84 questions.
9	Q Was the ten-year strategic plan focusing on	9	What happened at the leadership side was
10	the status quo of JEA or did it also involve an ITN and	10	Melissa Dykes asked kind of assigned, if you will,
11	IPO as well?	11	owners of the various questions to much like a public
12	A So I felt there was confusion in what the	12	records request. You say, hey, you're responsible for
13	deliverables should have been. The final plan seemed to	13	5, 6, 7, 12, 18. Had assigned those out and people were
14	be changing and was going to be finalized post a	14	supposed to go off and start gathering the appropriate
15	decision from the board.	15	information for this.
16	So a lot work was done on Scenario 1. Some	16	By the way, I wrote a really detailed timeline
17	work was done on Scenario 2 that we presented to the	17	of this that's sitting on the JEA's system of everything
18	board, and then work was being done on Scenario 3, which	18 19	that we did around this, if you guys ever want to get
19 20	could have been multiple options of recapitalization, and that the final result would have been when some	20	it. Kyle's seen it. Jody's seen it. Q Okay.
20	decisions were made, those would have been brought	20	A A very detailed timeline of all this. So I
21	together to say, okay, now here's the final plan	21	just don't want to get anything wrong because I know I
		23	wrote a lot of it down.
23	tinal strategic plan. So I believe there was a process		
23 24	final strategic plan. So I believe there was a process that we were going through		
23 24 25	that we were going through. Q Do you know when McKinsey started the ten-year	24	But that's how we originally started, was trying to much like a public records request

20 (Pages 77 to 80)

	Page 81		Page 83
1	understand the relevant information for the various	1	A So I think I think you're bringing two
2	questions. They were assigned out to SLT members. I	2	things together. Herschel did review public records
3	was assigned a couple of them.	3	requests. At this point in time what we're discussing,
4	Q Were those assignments done in writing?	4	we had yet to get to a point where we had actually
5	A I was told verbally by La'Trece Bartley. So I	5	reviewed these documents for public records, so
6	believe Melissa did it somehow, and we were informed of	6	Q Did you did JEA actually release any
7	which ones we had.	7	records to the SIC before Hill Ward was brought in, to
8	I because Melissa had asked me because our	8	your knowledge?
9	public records team was really burdened with a lot of	9	A We released we gave Kyle a USB the morning
10	public records at this time. She asked me to help just	10	of the meeting I believe it was March 10ish. You
11	drive the collection. So I then created a spreadsheet,	11	guys could find out when that meeting was that
12	which is also available, that basically put the name of	12	included previous public records that had already been
13	the person that I found was responsible for each	13	vetted and some information that was on our public
14	question.	14	website, What's Next Jax.
15	They then, within the first couple of weeks,	15	We gave those because there was frustration
16	started sending and I made it clear to them, I did	16	over the pace. We had already pulled well over 200,000
17	not want them sending us documents. I wanted them	17	records, but we did not have in place the process to
18	telling me where they were so that we could so that	18	then get them through a review.
19	we could continue with the integrity of the documents,	19	We had talked to Kyle. Kyle was in over his
20	and we could have the team pull it directly from the	20	eyeballs in things, and our public records team was in
21	source so there wasn't much like this watermark	21	over their eyeballs. So we had documents, but we had no
22	there wasn't a situation where someone had pulled	22	process at this point to get them reviewed, and that was
23	something down just to be responsive. We wanted to grab	23	partly why we also bought in Hill Ward, I believe.
24	it from the source as best we could.	24	Q Before Hill Ward was brought in, did JEA
25	So we gathered kind of that initial round.	25	involve Jasen Hutchinson in the SIC production?
	Page 82		Page 84
1	There were a lot of questions early on that we looked to	1	A No.
2	OGC for clarity on, were we supposed to get them by	2	Q Why not?
3	question; were we supposed to pull just broad amounts;	3	A Melissa had asked me to do it because Jasen
4	where were we supposed to put the data.	4	was buried in public records that we were severely
5	The attorneys for the special committee had an	5	
6	opinion that we should be using certain software, and so	1 7	delinquent on. So she was just trying to ultimately
	opinion that we should be using certain software, and so	6	delinquent on. So she was just trying to ultimately Jasen's team had to do all of our reviews, and then
7	we went through that whole process.		
7 8		6	Jasen's team had to do all of our reviews, and then
	we went through that whole process.	6 7	Jasen's team had to do all of our reviews, and then under Jody's leadership, we got that corrected and
8	we went through that whole process. I don't know how detailed you want me to go.	6 7 8	Jasen's team had to do all of our reviews, and then under Jody's leadership, we got that corrected and Jasen's team was brought in to drive it quite a bit,
8 9	we went through that whole process. I don't know how detailed you want me to go. I can get really detailed.	6 7 8 9	Jasen's team had to do all of our reviews, and then under Jody's leadership, we got that corrected and Jasen's team was brought in to drive it quite a bit, but
8 9 10	we went through that whole process. I don't know how detailed you want me to go. I can get really detailed. Q Let me stop and ask you questions. At some	6 7 8 9 10	Jasen's team had to do all of our reviews, and then under Jody's leadership, we got that corrected and Jasen's team was brought in to drive it quite a bit, but Q Were you ever told specifically to exclude
8 9 10 11	<ul> <li>we went through that whole process.</li> <li>I don't know how detailed you want me to go.</li> <li>I can get really detailed.</li> <li>Q Let me stop and ask you questions. At some point Hill Ward was brought in</li> </ul>	6 7 8 9 10 11	Jasen's team had to do all of our reviews, and then under Jody's leadership, we got that corrected and Jasen's team was brought in to drive it quite a bit, but Q Were you ever told specifically to exclude Jasen from the process?
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21 (Pages 81 to 84)

	Page 85		Page 87
1	that data that we had started pulling even before we had	1	A We handled it as a process. If someone put in
2		2	
2	Hill Ward Henderson, and we continued to pull that. We then needed it reviewed and asked Kyle if	3	a request, then we fulfilled it and we gave them their IDs and we gave them so I was not part of the
4	OGC could review it. They were buried, so we then went	4	decision as to why to give them to them.
4 5	to Jasen and said, Jasen, we need your help to review	5	
6		6	We were just my team was just the recipient of, hey, there's a request for three laptops and three
7	these things. So Jasen then we put in a process where Jasen was reviewing everything that we had pulled	7	IDs. And we executed them.
8	to those 33 that we had identified.	8	Q Who told you to give the negotiators tablets?
9	We later in the process, a couple weeks	9	A I don't recall. It would be in the system
10	later timing I don't remember we then actually got	10	when it was requested.
11	a list from Smith Hulsey of questions. The good news is	11	Q So it turns out that the tablets in the JEA
12	I think Smith Hulsey's list was like 18, and they	12	system are actually issued to you personally. Are you
13	overlapped with the 31 that we already identified except	13	aware of that?
14	for 2, so we knew we were in the right ballpark. And	14	A No, I wasn't.
15	Jasen was being used to review all of those records.	15	Q So like, for example, Stephanie Burch was one
16	Q Have you seen the FBI subpoena?	16	of the negotiators for the City.
17	A Yes.	17	A Yes.
18	Q Were you involved in responding to the FBI	18	Q And my understanding is that JEA records never
19	subpoena of JEA records?	19	reflected that the tablet was issued to Stephanie;
20	A I was involved from a pulling of the data;	20	instead it's registered to you.
21	staging the data in the system that Agent Blythe (ph)	21	You don't know why
22	could get to; staging a system that Jody Brooks and	22	A I did not know that.
23	Chris and others could review the information. I was	23	Q Who else at JEA besides yourself knew that JEA
24	responsible for that.	24	tablets had been issued to the non-JEA employee
25	Q Did you review what was being requested by the	25	negotiators?
			C C
	Page 86		Page 88
1	Page 86 FBI? Did you read the subpoena?	1	Page 88 A The procurement team who the leadership
1 2	_	1	
	FBI? Did you read the subpoena?	1	A The procurement team who the leadership
2	<ul><li>FBI? Did you read the subpoena?</li><li>A I read it one time.</li></ul>	2	A The procurement team who the leadership team, I would Melissa
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2 3 4 5	<ul><li>FBI? Did you read the subpoena?</li><li>A I read it one time.</li><li>Q Were you responsible for pulling any of the information requested?</li><li>A I think I just answered that I my teams</li></ul>	2 3 4 5	<ul> <li>A The procurement team who the leadership team, I would Melissa</li> <li>Q How do you know that they knew that the negotiators had JEA tablets?</li> <li>A Maybe it's an assumption on my part of when</li> </ul>
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	Page 89		Page 91
1	business.	1	Would you agree that the tablets and
2	Q Were you ever interviewed by anyone at	2	negotiators' emails would have been responsive to the
3	Hill Ward Henderson to educate them about the JEA	3	FBI request A(3)?
4	A A custodian interview?	4	A Can you say it one more time?
5	Q and the servers and what was what the	5	Q Sure.
6	universe of information would be?	6	A Or I can read it.
7	A Hill Ward?	7	MR. GRANAT: Sure.
8	Q Hill Ward.	8	We'll just mark it. It's my only copy but
9	A Okay. So not the meeting we had with Smith	9	we'll mark the FBI subpoena as Number 6.
10	Hulsey, so the Hill one. There was a custodian	10	(Exhibit Number 6 was marked for
11	interview that happened with me, yes.	11	identification.)
12	Q Did you ever mention during that interview or	12	BY MR. GRANAT:
13	at any other time to anyone with Hill Ward that the	13	Q Point you to A(3).
14	negotiators had JEA tablets and emails issued?	14	A Yeah, I believe so.
15	A I don't recall if it was in that meeting. I	15	Q So it was recently discovered at one of the
16	mean, during data collection and as soon as they	16	negotiators' interviews with the SIC that the tablets
17	were as soon as the process was canceled, we grabbed	17	had been issued and the email addresses had been issued.
18	their laptops, and they're locked up in a secure room in	18	And it turns out no one at Hill Ward or OGC had any
19	the tower.	19	knowledge that that had happened or that those emails
20	Q Do you know if you or anyone on your team ever	20	existed.
21	told Hill Ward or anyone at OGC that the tablets had	21	Do you know why that happened?
22	been issued to the negotiators?	22	A I do not. I do not.
23	A I don't recall.	23	Q When the tablets when the ITN was canceled,
24	Q Do you know if the data from the tablets or	24	do you know what happened to the tablets?
25	the email addresses were produced email addresses of	25	A We collected them.
	Page 90		Page 92
1	the three negotiators were produced to the SIC or the	1	Q Who is "we"? Who collected them?
2	FBI?	2	A I believe I don't know who physically got
3	A I don't think they were.	3	them from the three. It might have been the procurement
4	Q Why wouldn't they have been produced to the	4	team, Jenny or John, Jenny McCollum or John McCarthy.
5 6	SIC and the FBI?	5	But I know that it was given to my team, and it's locked
-	A We executed on custodian lists that were given	6	up in the tower in a secure location. Q Were the tablets imaged?
7 8	to us that were I was under the impression that were from discussions between Hill Ward Henderson and Smith	8	A No. Nothing's been done to them since the
	from discussions between film ward frenderson and Sinith	0	
	Hulson	9	-
9	Hulsey. The first set of 32 custodians did not include	9	order to not destroy anything.
10	The first set of 32 custodians did not include	10	order to not destroy anything. Q I mean, so
10 11	The first set of 32 custodians did not include them. The next set of 16 did not include them. I don't	10 11	order to not destroy anything. Q I mean, so A Sean, if I may, real fast? To answer your one
10 11 12	The first set of 32 custodians did not include them. The next set of 16 did not include them. I don't think I saw a single list of custodians that included	10 11 12	order to not destroy anything. Q I mean, so A Sean, if I may, real fast? To answer your one question, the custodian interview that Hill Ward
10 11	The first set of 32 custodians did not include them. The next set of 16 did not include them. I don't think I saw a single list of custodians that included them, and that was who we collected the data on.	10 11	order to not destroy anything. Q I mean, so A Sean, if I may, real fast? To answer your one question, the custodian interview that Hill Ward Henderson did was very individualized about my documents
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	Page 93		Page 95
1	have as to how that happened, the existence of those	1	and they have done everything that they've been asked to
2	emails didn't come to light?	2	do. That's all. That's the only reason. When you
3	A I don't know if there is a great explanation	3	asked that, I just wanted to be clear.
4	for it. I can tell you the way the whole process went	4	Q Is there a difference between the rest of JEA
5	down with it was very chaotic early on, and I will	5	as people do you know of anyone not pulling data that
6	openly admit it became much clearer when Jody Brooks	6	they were supposed to
7	came on around how we should be appropriately responding	7	A No, the answer is I don't know. Much like the
8	to things.	8	public records process, you know, when I talked about
9	We hired a law firm that was responsible for	9	earlier on, if somebody was assigned Number 6, I don't
10	working with the opposing counsel or the Smith Hulsey	10	have the knowledge to be able to come in and say they
11	to get to the data. Personally, I leaned into that	11	didn't give everything. I had to take what they
12	process and followed, you know, the questions that were	12	provided at their word.
13	asked and the things we were supposed to get. It's	13	Q Are you aware of anyone at JEA dragging their
14	possible it was missed. I don't have an explanation as	14	feet or not performing a search for the SIC or the FBI
15	to why it was missed.	15	properly or thoroughly?
16	On my end it certainly wasn't missed for any	16	A Not the people that I worked with, no.
17	reason, because we did collect the laptops. Much like	17	Q You again qualified your answer. I'm just
18	your amazement, I'm yeah, I'm kind of surprised we	18	asking, have you heard or is there a thought in your
19	missed it, but with the amount of things going on,	19	mind that maybe someone else at JEA hasn't thoroughly
20	things get dropped.	20	responded or promptly responded?
21	Q You referred to Smith Hulsey as opposing	21	A Sean, I think my answer is more because of the
22	counsel?	22	questions, and I understand the questions. I do. I
23	A I don't know what the right term is.	23	understand the frustration of why things weren't done.
24	Q I mean, were they viewed as opposing counsel?	24	I understand the frustration of how did these emails get
25	Was this an oppositional adversarial process in your	25	missed. They're valid questions. I don't have answers
	Page 94		Page 96
1	mind?	1	to them.
2	mind? A There were some emails that it felt like it	2	to them. Q And my question is, do you have knowledge
2 3	mind? A There were some emails that it felt like it was contentious between lawyers. I was never involved.	2 3	to them. Q And my question is, do you have knowledge A I don't have knowledge, no, I do not.
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	Page 97		Page 99
1	_	1	_
1 2	was, you know, ITN or negotiated I tried to use search terms in that data set.	2	other type of program or methods of communication other than verbal, email, GroupMe, or text?
3	There's also questions about third parties, so	3	A No.
4	I think any text that I had sent McKinsey, I produced.	4	Q Were emails discouraged between the SLT?
4 5	Q So the request wasn't for all your JEA-related	5	A No.
6	texts? It was targeted?	6	Q Were you ever told not to email certain
7	A That's how it came that's how I went after	7	documents back and forth?
8	it, yes.	8	A No.
9	MR. NICHOLS: Sean, and I apologize to	9	Q I understand that after Melissa Dykes left
10	interrupt you. He said something on the record	10	JEA, there was her tablet her JEA-issued tablet
11	that, I think, everybody in the room understood	11	was erased.
12	what he meant, but the record's going to reflect	12	Can you tell me how that happened?
13	something different.	13	A That was a mistake by me. We got her tablet,
14	He said "2018 and beyond." I think we all	14	and I was asked by Jody and the team to try to get her
15	knew he meant before. I think y'all kind of nodded	15	OneNote. So we had entered in I asked La'Trece if
16	your heads as well. I mean, if that's okay, if you	16	she knew her pass code. La'Trece gave me one, and I had
17	don't mind, if I could have that corrected and have	17	entered it in.
18	him say that's what he meant he didn't provide	18	I then called Melissa and asked for her pass
19	what was 2018 and before. I mean, I think that's	19	code and she gave me two to try. And in that, I
20	what he meant to say.	20	think if I and I might have entered one in a
21	MR. GRANAT: Sure, sure.	21	couple of times. We have a program that if you fail so
22	THE WITNESS: That's what I meant to say.	22	many times, it actually wipes the device.
23	BY MR. GRANAT:	23	Q So Melissa didn't know her pass code?
24	Q Okay. So you don't know what the exact public	24	A She did not.
25	records request for your texts was?	25	Q Was it a tablet that used her thumbprint?
			-
	Dago 09		
	Page 98		Page 100
1	A That public records request was even smaller	1	Page 100 A It was not.
1 2	_	1	-
	A That public records request was even smaller		A It was not.
2	A That public records request was even smaller than this. I searched a lot more terms because that	2	<ul><li>A It was not.</li><li>Q So she would have had to have used the code</li></ul>
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25 (Pages 97 to 100)

	Page 101		Page 103
1	Q Okay.	1	outsource payroll.
2	A Because it was an Apple device.	2	Q What was Melissa's response to that?
3	Q But you think on the device itself	3	A They said that there's a business case that
4	A I think the device is wiped.	4	supports outsourcing payroll. So I said, okay.
5	Q Okay. Can you tell me when ADP was first	5	Q And was that Jon's response as well?
6	considered for JEA payroll?	6	A Jon was Jon was responsible for the
7	A Late 2019.	7	business case, so
8	Q Whose idea was it to use ADP?	8	Q Do you know which JEA employees were going to
9	A I don't know who came up with the idea. I was	9	be part of the ADP payroll?
10	approached about it I was approached and asked if I	10	A I do not.
11	heard about the project yet. I said no. I then went to	11	Q Do you know if it was going to be the entire
12	Melissa and Jon Kendrick and found out about the	12	company or just part of the employees?
13	project.	13	A Okay. It was going to the first phase was
14	Q You said you were approached by Melissa?	14	going to be the appointed employees.
15	A No.	15	Q Do you know why it was only going to be
16	Q I'm sorry. Can you repeat what you just said?	16	appointed employees?
17	A Someone approached me and said, have you heard	17	A A subset was what I assumed. It was a smaller
18	about the project? I think Aaron approached me and	18	subset, and the some of the timekeeping and some of
19	said, have you heard about the project yet?	19	the things around the union workforce is it's just a
20	I said, no.	20	longer project.
21	He said, check in with Jon and Melissa.	21	Q So I'm just curious about I just want to
22	I said, okay. So I then checked in with	22	back up for a minute when they told you that ADP
23	Jon Kendrick and Melissa Dykes.	23	could do the PUP deductions, did you ask any more
24	Q When you checked in with Jon and Melissa, what	24	questions about that? What they meant by that?
25	was told to you about the ADP project?	25	A During the requirements phase, it happened
23	was told to you about the ADF project?	2.5	A During the requirements phase, it happened
	D 100		
	Page 102		Page 104
1	A I was told that we wanted to outsource	1	Page 104 over the next week or so, just found out more about the
1 2	A I was told that we wanted to outsource	1	over the next week or so, just found out more about the
	_		-
2	A I was told that we wanted to outsource payroll. I was also in a conversation told that it	2	over the next week or so, just found out more about the logistics of there's going to be a third-party firm that
2 3	A I was told that we wanted to outsource payroll. I was also in a conversation told that it would help with the deductions of the PUP which of the PUPs.	2 3	over the next week or so, just found out more about the logistics of there's going to be a third-party firm that was going to completely handle and mind you, handle a
2 3 4	A I was told that we wanted to outsource payroll. I was also in a conversation told that it would help with the deductions of the PUP which of the PUPs.	2 3 4	over the next week or so, just found out more about the logistics of there's going to be a third-party firm that was going to completely handle and mind you, handle a system that I knew nothing about still, as far as what
2 3 4 5	<ul> <li>A I was told that we wanted to outsource payroll. I was also in a conversation told that it would help with the deductions of the PUP which of the PUPs.</li> <li>Q Who told you that?</li> <li>A I believe I heard it from both of them at</li> </ul>	2 3 4 5	over the next week or so, just found out more about the logistics of there's going to be a third-party firm that was going to completely handle and mind you, handle a system that I knew nothing about still, as far as what it was going to be and what it was going to look like. They were going to send letters to employees,
2 3 4 5 6	A I was told that we wanted to outsource payroll. I was also in a conversation told that it would help with the deductions of the PUP which of the PUPs. Q Who told you that? A I believe I heard it from both of them at different times, but	2 3 4 5 6	over the next week or so, just found out more about the logistics of there's going to be a third-party firm that was going to completely handle and mind you, handle a system that I knew nothing about still, as far as what it was going to be and what it was going to look like. They were going to send letters to employees, and people were going to respond back to that third
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26 (Pages 101 to 104)

1 2	Page 105		Page 107
2	would ask on any project started getting checkmarked.	1	for employees and their financial decisions regarding
	Q When you said is there a state contract, do	2	the PUP?
3	you mean one that JEA could piggyback on?	3	A I did hear about the first half of that,
4	A Yes.	4	creating can you rephrase that? Because I just want
5	Q Why did you ask that? Why didn't you think	5	to get it right.
6	that it should go through normal procurement vetting?	6	Q Yeah. Did you ever hear anyone express any
7	A Just because the pace in which I was told it	7	thoughts that outsourcing payroll to ADP might provide
8	had to get done.	8	some layer of privacy for employees?
9	Q So tell me about what was the pace that you	9	A Yes. Yes.
10	were told this had to be done in?	10	Q So tell me about that, please. What did you
11	A Well, when you start talking to ADP number	11	hear?
12	one, from a tax perspective, you do payroll at the	12	A There was a conversation around whether or not
13	beginning of the tax year, or you actually have to get a	13	if we outsourced payroll, would it still be a public
14	separate VIN number and some other things. So some of	14	record, was the conversation I remember having. So I
15	the work would have to be done at a at a January	15	may be taking that into what I interpret into what
16	point from a tax perspective.	16	you asked.
17	And then, again, a plan that hadn't been	17	I remember a conversation about that and
18	completed, they wanted that to be a part of it, so	18	someone coming back and saying that has that doesn't
19	Q So do you know who actually reached out to ADP	19	stop any of the public record laws.
20	and started the communication with JEA?	20	Q Who was a part of that conversation?
21	A When I got involved, Jon Kendrick had a	21	A I think it was a conversation I think
22	relationship with one of the salespeople. I don't know	22	Jon Kendrick and I had where Jon also said it wasn't
23	if he had the first connection with them or not. I do	23	going to stop any public record laws.
24	not know.	24	(Exhibit Number 7 was marked for
25	Q Are you aware that when JEA piggybacks on	25	identification.)
	Page 106		Page 108
1	another government contract that the contract can only	1	BY MR. GRANAT:
			DI WIK. UKANAI.
2	be signed for one year?	2	Q Exhibit 7 is and I only have one copy of
2 3	be signed for one year? A I was not aware of that.	2 3	
			Q Exhibit 7 is and I only have one copy of
3	A I was not aware of that.	3	Q Exhibit 7 is and I only have one copy of it. It's a string of emails. I'm just going to hand it
3 4	<ul><li>A I was not aware of that.</li><li>Q Did you know was there any indication that</li></ul>	3 4	Q Exhibit 7 is and I only have one copy of it. It's a string of emails. I'm just going to hand it to you and let you review it and then I'll ask
3 4 5	<ul><li>A I was not aware of that.</li><li>Q Did you know was there any indication that</li><li>the ADP project would be well, let me rephrase that.</li></ul>	3 4 5	Q Exhibit 7 is and I only have one copy of it. It's a string of emails. I'm just going to hand it to you and let you review it and then I'll ask questions.
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27 (Pages 105 to 108)

	Page 109		Page 111
1	A Yes.	1	A Because it was October 17th and we needed
2	Q Do you know who Ms. Anos is?	2	if we were going to hit a date of January 1st from a tax
3	A I do not.	3	perspective, there was a lot of work. I think the
4	Q Katura Owens replied to that. Who's Katura	4	initial estimate from ADP was 18 weeks or I don't
5	Owens?	5	recall, but it was a very aggressive timeline.
6	A Katura is a project manager in my	6	I was playing hard ball with the vendor also
7	organization.	7	to get them to say if we can't get this done because
8	Q She works for you?	8	you're a partner in this, then tell us now and we'll
9	A She's in my yes.	9	stop the project.
10	Q And in her response she references a message	10	Q Right. You went on to say, "I'm being direct
11	that you and Jon gave. And I guess she's referring to	11	because Jon and I are on the hook with our president and
12	Jon Kendrick?	12	CEO. They have asked us daily about this and our
13	A Yes.	13	confidence in success."
14	Q What was the message that you and Jon gave	14	Is that true?
15	regarding the ADP project?	15	A Yes.
16	A So, again, to the point of this project should	16	Q So can you explain to me why when you didn't
17	be done because it makes sense for JEA to outsource	17	even know if there was a business case for outsourcing
18	their payroll; that's why we should do this project. So	18	at the time that the president and CEO were asking you
19	even with the cancellation of the PUPs, the message was	19	daily about this project?
20	let's continue the analysis phase.	20	A Because I was told there was a business case.
21	The other thing that happened in this, during	21	I didn't dive into it. I took my leadership at their
22	the creation of the contract with ADP, there were phases	22	word that there was a business case; therefore, I dove
23	that we could stop the project. So with the	23	into execution mode.
24	understanding that there was a business case behind	24	Q Okay. But it's true that Melissa Dykes and
0.5	-	25	
25	outsourcing payroll, we told them to continue through Page 110		Aaron Zahn asked you daily about whether the ADP project Page 11.
25		1	
	Page 110		Page 11
1	Page 110 the analysis phase.	1	Page 11 was on track?
1 2	Page 110 the analysis phase. You're probably going to ask me soon. There	1 2	Page 11 was on track? A I might have been a little verbose with "daily," but they asked me a lot. This was a very
1 2 3	Page 110 the analysis phase. You're probably going to ask me soon. There was a meeting after this where we actually canceled the	1 2 3	Page 11 was on track? A I might have been a little verbose with "daily," but they asked me a lot. This was a very
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28 (Pages 109 to 112)

	Page 113		Page 115
1	some of my experts, and validated that the concerns were	1	came through.
2	there, and it didn't look like it could be a successful	2	THE WITNESS: I have no idea what he's talking
3	project, so we pulled the plug.	3	about.
4	Q Do you know when the ADP project was canceled	4	MR. GRANAT: I'll look at it, and just for the
5	exactly?	5	record
6	A Exactly, I do not know. It was very soon	6	MR. NICHOLS: Yeah, go ahead.
7	around after these emails.	7	BY MR. GRANAT:
8	Q It was very shortly after the PUP was	8	Q It's Tuesday, 2:51 p.m., from Aaron Zahn, and
9	canceled?	9	it says, "You should read motion filed today and share
10	A Very shortly after November 20th. If that was	10	with counsel."
11	around the time the PUP was canceled, then yes.	11	Thank you.
12	Q Who made the ultimate decision to cancel the	12	Other than that LinkedIn, have you had any
13	ADP project?	13	communication with Aaron Zahn since he was terminated
14	A I gave a strong recommendation from the	14	from JEA?
15	technology standpoint as to why it couldn't I took	15	A Aaron Zahn has texted me twice I texted him
16	that to Melissa Dykes, Jon Kendrick and then and	16	the day after he was terminated and just said, "Thank
17	then, you know, she agreed that we could cancel.	17	you for the opportunity to be a CIO."
18	Q Have you ever used Box.com?	18	Q Did he respond?
19	A Can I give you a one-word answer? I have used	19	A He never responded to me.
20	Box.com. Are you asking about from a work	20	I then got a text from him I've gotten two
21	Q What is Box.com?	21	texts from him since then.
22	A Box is it's a cloud file sharing system.	22	Q What were the texts? And can you tell me the
23	Q Have you used it for any JEA-related purpose?	23	phone number that he texted from?
24	A McKinsey had I'm trying to remember if it	24	A So May 24th he asked me if I had an attorney,
25	was Box or if it was Dropbox. It might have been Box.	25	and if so, would I mind sharing their contact info. I
	Page 114		Page 116
1	-	1	-
1	That would be the only one that I can recall.	1	said, Mr. Nichols, and gave him his office number.
2	That would be the only one that I can recall. Q Do you know like whatever account or storage	2	said, Mr. Nichols, and gave him his office number. He then said, "Thanks. God bless you and your
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2 3	That would be the only one that I can recall. Q Do you know like whatever account or storage cloud particle that you used with Box.com relating to JEA business is known by Hill Ward or anyone else so that can be accessed?	2 3	said, Mr. Nichols, and gave him his office number. He then said, "Thanks. God bless you and your family." And I said, "Thank you. I hope you are all healthy and safe."
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1       BY MR. WEDEKIND:         2       Q       We taiked a title bit about the Intraintos         3       database a whish hack. Doys are member that?         4       A. (Node head.)         5       Q. Doys and now who had the highest level of permission for the Intraintos database?         7       A. For JEA!         8       Q. For ampbody, buil et's start with JEA.         9       A. Itawo Steve Mehaalt had the highest. He gave         11       mybe, us I was trying to help Chris and Jody with some         12       staff. I dath hars it until then. And we have all         15       mybe, us I was trying to help Chris and Jody with some         12       a. How Steve Mehaalt had the highest. He gave         13       D. Itaw about anybody outside of TA?         14       Q. How doed a Heft - the answer is 1 dort         15       A. I would - I dort it how who had habuse, and it looks like         16       A. Yes.         17       D haw sout a How The hearswer is 1 dort         18       A. Yes.         19       Q. So we went in recently and looked at the documents, they're empty.         10       D syou know how that happener?         11       D syou know how that happener?         12       A. Yes.         12		Page 117	Page 119
3       database a while back. Do you remember that?       3       Q       So are convestion?         4       A (Nach had.)       3       Q       So are convestion?         6       Do you know who had the highest level of a permission for the Intralinks database?       6       Q       Anything substantive?         7       A For IEA?       6       Q       Anything substantive?       7       A         9       A Teknow Stewe Mchall hid the highest. He gave in maybe, as twas trying to help Chris and Jody with some 11 the records of all the access.       7       A       No.         12       stuff. I didn't have it until then. And we have all there coords of all the access.       7       A       You're looking for current employces?         13       Q       And by the banks, "you mean J.P. Morgan and Medisa?       7       A       Yes.         14       A Yes.       Q       Na was under Ryan and Medisa?       7       A Yes.         14       A Yes.       Q       A Yes.       7       A Yes.         15       A Yes.       Q       A Yes.       2       Q Naby by the banks, "you mean J.P. Morgan and Medisa?         15       A Yes.       Q       A Yes.       2       Q Okay. Who provided you cited the filth stabase, and it looks it it for unters, thare?         14 <th>1</th> <th>BY MR. WEDEKIND:</th> <th>1 A The initial conversation of, have you talked</th>	1	BY MR. WEDEKIND:	1 A The initial conversation of, have you talked
4       A       Yeh. And may have checked in on how was it         5       Q       Do you know who had the highest level of       gen; That was it.         6       Permission for the Inthinks database?       A       Nah, May have checked in on how was it         7       A       For JEA?       A       No.         8       Q       For anybody, but left start with JEA.       Q       Do you know when McKinsey began the process of         9       A       Itam ways and the highest level of access, gally, six weeks ago       D       A lob not.         11       the records of all the access.       D       A you would know that?         12       A       Itam ways and the highest level of access, gally, six weeks ago       D       A lob not.         12       A       Itam ways and the ingerest it don't       A       A lob not.         13       the records of all the access.       D       A would availe access.       D         14       Q       How about anybody outside of JEA?       A       Yeb.       A strain and Melissa?         14       P would availe, thom way may and the highest it on thow way and the highest it on the strain and the highest?       D       A yeb.         15       Q       So one, I would ask it metal. How dow and anybody outside and the chighest it on strain that he par	2	Q We talked a little bit about the Intralinks	2 to Melissa about the payroll project, that was it.
5     Q     Do you know who had the highest level of     5     geing. That was it.       6     Q     Anything ubstantive?       7     A     For EA?       8     Q     For anybody, but lef's start with JEA.     8       9     A     Item sets the work formal had the highest. He gave       9     maybe, as I was trying to help Chris and Jody with some     11     Q       11     as tuff. I didth have start mill then. And we have all     11     Q     Who would havo that?       12     stuff. I didth have start mill then. And we have all     11     Q     Who would havo that?       13     the records of all the access.     13     Q     Anybody cles?       14     Q     How about anybody outside of JEA?     14     A     You'do 1 - I doin't.       15     A     I would - I doin't.     15     A     Vicouf - I doin't.       16     know. It hink - you want to know who I think might - I hink some of the banks might     18     Q     A wise under Rym and Melisaa?       19     Q     So we went in recently and looked at the     2     Q     I haw as under Rym and Melisaa?       21     A     Yes.     2     Q     Out at them, the documents, they're empty.       22     When you look at them, the documents, they're empty.     25     I	3	database a while back. Do you remember that?	3 Q So one conversation?
6       Q       Asysting substantive?         7       A       For IFA?       A         8       Q       For anybody, but let's start with JFA.       A       No.         9       Q       For anybody, but let's start with JFA.       Q       Do you know when McKinsey began the process of parting together financial modeling?         10       me the highest level of access, golly, six weeks ago       A       I do not.         11       Q       How about anybody outside of JEA?       A       No.         12       the records of all the access.       II       A       You're looking for current employees?         15       A       Iwouid - 1 don't - the answer is I don't       No.       A       You're looking for current employees?         16       A by the banks, 'you mean J.P. Morgan and       O       A for the lamaning for, I         17       I think some of the banks, 'you mean J.P. Morgan and       O       No ene.         2       Q       So we went in recently and looked at the       A       Yes.         2       O So we went in recently and looke lat the?       A       Yes.         2       When you go to open the documents, mely recently.       The adocunt robut of the planning for, I         2       Bo you know how that happened?       A       <	4	A (Nods head.)	4 A Yeah. And may have checked in on how was it
7       A       For JEA?       7       A       No.         8       Q       For anybody, but let's start with JEA.       9       Do you know when McKinacy began the process of putting together financial modeling?         10       maybe, as I was trying to help Chris and Jody with some start.       14       A       I do not.         11       maybe, as I was trying to help Chris and Jody with some start.       12       A       Ryan Wanemacher.         12       A       I do not.       A       Not.       A         13       the records of all the access.       12       A       Ryan Wanemacher.       13         13       the records of all the access.       14       A       Not would know that?       15         14       How about anybody outside of IEA?       15       A       Year bodying for current employees?       14       A       Year bodying for any the banks," you mean JP. Morgan and Medisar?       15       A       Year bodying for the planning for, I       12       15       A       Year bodying for any the planning for, I       12       16       No acc.       17       Theadcourt reduction. Do you recements are all three.       16       16       A       Year.       17       16       A       Year.       12       B       17       16       A<	5	Q Do you know who had the highest level of	5 going. That was it.
8       Q. For anybody, but let's start with JEA.       8       Q. Do you know when McKinsey began the process of         9       M. Honow Steve McInall had the highest. He gave       9       putting togetler financial modeling?         11       maybe, as I was trying to help Chris and Jody with some       11       Q. Who would know that?         12       attribute i unit if then. And we have all       12       A. Ryan Wannemacher.         12       d. How about anybody outside of JEA?       3       Q. Anybody else.         13       Q. How about anybody outside of JEA?       4       A. Youte looking for current employees?         14       D. you know whot how think night -       11       A. Youte looking for current employees?         14       A. Worker Mackshear may. There's a team that       14       A. Youte looking for current employees?         15       A. Jub of the banks, 'you mean J.P. Morgan and       16       A. Yes.         20       A sow were in recently and looked at the       23       A. Yes.         21       A. Yes.       23       Q. Alt right. As part of the planning for, 1         22       Q. So we were in recently and looked at the       23       A. Yes.         23       When you look at them, the documents are all there.       23       A. Yes.         24       D olyay. Who provi	6	permission for the Intralinks database?	6 Q Anything substantive?
9     A     I know Steve Mchall had the highest. He gave me the highest level of access, golly, six weeks ago     9     putting together financial modeling?       10     member, a lwast trying todely with some     10     A     I do not.       12     stuff. I didn't have it until then. And we have all     10     A     I do not.       13     the records of all the access.     III. All would -1 don't the answer is I don't     12     A     Nanoucher.       14     It would -1 don't the answer is I don't     13     Q     Anybody else.       15     A     I would -1 don't know.     16     A     Vietor Blackshar may. There's a team that       16     have, but I don't know.     16     A     Vietor Blackshar may. There's a team that       16     have, but I don't know.     16     A     Vietor Blackshar may. There's a team that       17     A     Yes.     0     So we wen in recently and looked at the       20     Q     So we wen in recently and looked at the     20     Q     Q       21     A     Yes.     20     O kar paint could see things and I       22     When you look at them, the documents are all there.     23     A     Yes.       23     A     Yes.     24     Q     Okar, Who provided you instructions on how to       25<	7	A For JEA?	7 A No.
10       me the highest level of access, golly, six weeks ago       10       A 1 do not.         11       maybe, as I was trying to help Chris and Jody with some       11       Q       Who would know that?         11       stuff. 1 do't have in uited help. And we have all       11       Q       Anybody class?         12       A I would -1 do'n I when we have all       12       A Ryan Wannermacher.         12       A Yould -1 do'n I when we have all       13       Q       Anybody class?         13       D I would -1 do'n I we numer Approves?       14       A Youre looking for current employees?         14       D would -1 do'n I we numer Approves?       14       A Youre looking for current employees?         14       I how could I do'n I we numer Approves?       15       A Anybody class?         15       A Yould -1 do'n I we numer Approves?       16       A Vector Blackshear may. There's a team that         16       Morgan Stanley?       20       Q So we were in recently and looked at the       22       A Yes.         20       S ow went in recently and looke like the       17       helped in the financial area.       18         21       A Yes.       11       Do you know that happened?       14       A Yes.         21       D you know that happened?       1 <t< th=""><th>8</th><th>Q For anybody, but let's start with JEA.</th><th>8 Q Do you know when McKinsey began the process of</th></t<>	8	Q For anybody, but let's start with JEA.	8 Q Do you know when McKinsey began the process of
11       Q       Who would know that?         12       stuff. 1 didn't have it until then. And we have all       14       Q       May and consider the stuff.         12       A       Ryan Wannemscher.       13       Q       Anybody else?         14       Q       How about anybody outside of JEA?       14       A       You're looking for current employees?         15       A       I would - I don't - the answer is I don't       16       A       Vou're looking for current employees?         16       have, buil don't know.       16       A       Vou're looking for current employees?         17       I think some of the - I think some of the banks might       16       A       Vou're looking for current employees?         18       have, buil don't know.       16       A       Voire Blackhear may. There's a team that         19       Q       And by 'the banks,' you mean J.P. Morgan and       17       helped in the financial arca.         20       So we with in recently and looks like       20       Q       All right. As part of the planning for, I         21       A       Yes.       21       Headcount reduction. Do you remember that?         22       When you look at them, the documents, they're empty.       23       A       Yes.         22	9	A I know Steve McInall had the highest. He gave	9 putting together financial modeling?
12       stuff. I didn't have in until then. And we have all       12       A. Ryan Wannemacher.         13       the records of all the access.       13       Q. Anybody else?         14       Q. How about anybody outside of JEA?       14       A. You'te looking for current employees?         15       A. I would - I don't - the answer is I don't       15       Q. Anybody else.         16       know, Uthink - you want to know who I think might -       16       A. Victor Blackhear may. There's a team that         17       I think some of the - I think some of the banks might -       16       A. Victor Blackhear may. There's a team that         18       pare, but I don't know.       Q. That was under Ryan and Melissa?       19       A. Yes.         19       A. Yes.       Q. O Lay. Who provided you instructions on how to       20         20       So we went in recently and looked at the       23       A. Yes.       24       Q. O Lay. Who provided you instructions on how to         21       A. Yes.       24       Q. O Lay. Who provided you instructions on how to       25       go about doing that?         22       Q. So we went in treemtly and looked at the       23       A. Yes.       24       Page 120         2       A. I think that's a permissions problem, I think.       Becauset here were times that I could see things and I	10	me the highest level of access, golly, six weeks ago	10 A I do not.
13       the records of all the access.       13       Q Anybody else?         14       Q How about anybody outside of JEA?       14       A Yorke looking for current employees?         15       A I would I dorn the most of the banks might       16       A Yorke looking for current employees?         16       know. I think you want to know who I think might       16       A Yorke looking for current employees?         17       I think some of the I think som if the       16       A Yorke looking for current employees?         18       have, but I dor't know.       17       helped in the financial area.       18         19       Q And by "the banks," you mean J.P. Morgan and       19       A Yes.         20       So we went in recently and looked at the       20       G All right. As part of the planning for, I         21       A Yes.       20       G Akyody else?       21         24       when you look at them, the documents, they're empty.       17       Helevel in the financial area.       18         23       Bo you know how that happened?       2       Q Okay. Who provided you instructions on how to       2         24       Do you know how that happened?       1       A No one.       2       Q How did you come up with the number of         15       Because there were times t	11	maybe, as I was trying to help Chris and Jody with some	11 Q Who would know that?
14       Q How about anybody outside of JEA?         15       A I would - I don't - the answer is I don't         16       know. I think - you want to know who I think might -         17       I think some of the - I think some of the banks might         18       have, but I don't know.         19       Q And by 'the banks,'' you mean J.P. Morgan and         20       Morgan Stanley?         21       A Yes.         22       Q So we went in recently and looked at the         23       Q So we went in recently and looked at the         24       When you go to open the documents are all there.         25       When you go to open the documents, they're empty.         Page 118         Page 118         1       Do you know how that happened?         2       A I think that's a permissions problem, I think.         3       Because there were times that I could see things and I         4       A No one.         2       Q How did you come up with the number of         3       headcount to be reduced?         4       A No one.         2       Q How did you come up with the number of         3       headcount to be reduced?         4       A Other than the leanup process I spoke to	12	stuff. I didn't have it until then. And we have all	12 A Ryan Wannemacher.
15       A I would I don't the answer is I don't         16       know. I think you want to know who I think might         17       I think some of the I think some of the banks might         18       have, but I don't know.         19       Q And by 'the banks,' you mean J.P. Morgan and         20       Morgan Stanley?         21       A Yes.         22       Q So we went in recently and looked at the         24       documents in the Intralinks database, and it looks like         24       when you look at them, the documents are all there.         25       When you go to open the documents, they're empty.         Page 118         1       A No one.         2       Q how did you come up with the number of         3       Because there were times that I could see things and I         4       couldn't open them either but Steve could open them.         5       So, one, I would ask is - you guys should check it         5       is it a permission problem? If they truly aren't         7       there, I do not know.         8       Q Do you know if anybody ever instructed the         9       bankers to delete or alter any documents within the         11       A Other than the cleanup process I spoke to         1	13	the records of all the access.	13 Q Anybody else?
16       know. I think - you want to know who I think might -         17       I think some of the - I think some of the banks might         18       have, but I don't know.         19       Q And by 'the banks,'' you mean J.P. Morgan and         20       Morgan Stanley?         21       A Yes.         22       Q So we went in recently and looked at the         23       documents in the Intralinks database, and it looks like         24       when you look at them, the documents are all there.         25       When you go to open the documents, they're empty.         Page 118         Page 118         Page 118         1       Do you know how that happened?         2       A I think that's a permissions problem? I think.         3       Bo zouse there were ines that I could see things and I could at them, I do not now.         4       Q Okay. Who provided you instructions on how to         5       go about doing that?         Page 118         1       A No one.         2       Q How did you come up with the number of         3       bankchat's - you guys should check it         6       is it age that the highest level of         11       A Other than the cleanup process I	14	Q How about anybody outside of JEA?	14 A You're looking for current employees?
17       I think some of the I think some of the banks might have, but I don't know.       17       helped in the financial area.         18       A A dot of't know.       18       Q That was under Ryan and Melissa?         19       Q And by "the banks," you mean J.P. Morgan and Melissa?       19       A Yes.         21       A Yes.       20       Q we went in recently and looked at the documents in the Irrainks database, and it looks like when you look at them, the documents are all there.       21       believe, Scenario 2, you were asked to put together an         22       Q So we went in recently and looked at the documents in the Irrainks database, and it looks like when you look at them, the documents are all there.       23       Q Okay. Who provided you instructions on how to go go about doing that?         23       Do you know how that happened?       A No one.       24       Q How did you come up with the number of sheadcount to be reduced?         4       culdn't open them either but Steve could open them.       50, one, I would ask is - you gays should check it - first its a permission is problem? If they truly aren't there, I do not know.       7       A Not of't it - like I side artier, I had       7         7       there, I do not know.       10       Iaf canough along for when that had to be created.       8       11         8       Q Dis you know if anybody ever instructed the bankers to delete or alter any documents withifn the linghest level of peremission is what's called	15	A I would I don't the answer is I don't	15 Q Anybody else.
13       have, but I don't know.       13       Q That was under Ryan and Melissa?         19       Q And by "the banks," you mean J.P. Morgan and       13       A Yes.         20       Morgan Stanley?       20       Q All right. As part of the planning for, I         21       A Yes.       20       Q All right. As part of the planning for, I         22       Q So we went in recently and looked at the       20       Q All right. As part of the planning for, I         23       M Yes.       21       A Yes.         24       when you look at them, the documents are all there.       23       A Yes.         25       When you go to open the documents, they're empty.       25       go about doing that?         25       Do you know how that happened?       1       A No one.       2         2       Q think that's a permissions problem? If they truly aren't       3       headcount to be reduced?         3       beakers to delete or alter any documents within the       3       fir enough along for when that had to be created.         3       pacterissions problem? If they truly aren't       7       bok at dopprotities within JEA as well. We were not         4       for noned alatabase?       1       A Other than the cleanup process I spoke to         2       go Is it right that the highest level of </th <th>16</th> <th>know. I think you want to know who I think might</th> <th>16 A Victor Blackshear may. There's a team that</th>	16	know. I think you want to know who I think might	16 A Victor Blackshear may. There's a team that
19       Q And by "the banks," you mean J.P. Morgan and       19       A Yes.         21       A Yes.       20       Q All right. As part of the planning for, I         22       Q Sowe went in recently and looked at the       21       believe, Scenario 2, you were asked to put together an         23       documents in the Intralinks database, and it looks like       23       A Yes.         24       When you look at them, the documents are all there.       24       Q Okay. Who provided you instructions on how to         25       When you go to open the documents, they're empty.       25       g about doing that?         Page 118         1       Do you know how that happened?       2       A No one.         2       A I think that's a permissions problem, I think.       Because there were times that I could see things and I       3       headcount to be reduced?         4       couldn't open them either but Steve could open them.       4       A No one.       2       Q How did you come up with the number of         5       bankers to delete or alter any documents within the       5       previously done some outsourcing work for GE Appliances,         11       A Other than the cleanup process I spoke to       2       ard I had actually started engaging with a vendor to         15       A I don't know. It may be. I don't know. <t< th=""><th>17</th><th>I think some of the I think some of the banks might</th><th>17 helped in the financial area.</th></t<>	17	I think some of the I think some of the banks might	17 helped in the financial area.
20       Morgan Stanley?       20       Q All right. As part of the planning for, I         21       A Yes.       20       Q All right. As part of the planning for, I         22       Q So we went in recently and looked at the       22       Place Name         23       documents in the Intralinks database, and it looks like       23       A Yes.         24       when you look at them, the documents are all there.       24       Q Okay. Who provided you instructions on how to         25       When you go to open the documents, they're empty.       24       Q Okay. Who provided you instructions on how to         26       Q Jokow how that happened?       2       A No one.         2       Q How di you come up with the number of         3       Because there were times that I could see things and I       3       headcount to be reduced?         4       couldn't open them either but Steve could open them.       5       previously done some outsourcing work for GE Appliances, and I had actually started engaging with a vendor to         1       Do you know if anybody ever instructed the       9       So I just used some industry averages around         10       Intralinks database?       13       So I just used some industry averages around         10       Intralinks database?       13       So the thought - the concept there was were      <	18	have, but I don't know.	18 Q That was under Ryan and Melissa?
21       A       Yes.       21       believe, Scenario 2, you were asked to put together an         22       Q       So we went in recently and looked at the       22         23       documents in the Intralinks database, and it looks like       4       Yes.         24       when you look at them, the documents are all there.       23       A       Yes.         25       When you go to open the documents, they're empty.       23       A       Yes.         2       A       I think that's a permissions problem, I think.       Because there were times that I could see things and I         3       Because there were times that I could see things and I       4       A       No one.         2       A       I think that's a permissions problem, I think.       2       Q       How did you come up with the number of         3       Because there were times that I could see things and I       4       A       No one.       2         4       Q       Do you know if anybody even instructed the       bankers to delete or alter any documents within the       3       headcount to be reduced?         11       A       Other than the cleanup process I spoke to       1       fer under Scenario 2 was a fire sale, so we're not         13       Q       B is it right that the highest level of       13	19	Q And by "the banks," you mean J.P. Morgan and	19 A Yes.
22       Q       So we went in recently and looked at the       22       IT headcount reduction. Do you remember that?         23       documents in the Intralinks database, and it looks like       23       A       Yes.         24       when you look at them, the documents are all there.       23       Q       Okay. Who provided you instructions on how to         25       When you go to open the documents, they're empty.       25       go about doing that?         21       Do you know how that happened?       2       A       N one.         2       A       I think that's a permissions problem, I think.       3       Because there were times that I could see things and I       4       A No one.       2       Q       Headcount to enduced?       A       A A lot of it like I said earlier, I had       5       headcourcing work for GE Appliances, and I had actually started engaging with a vendor to       1       1       headcourt to be reduced?       6       is it a permissions problem? If they truly aren't       7       look at opportunities within JEA as well. We were not       8       far enough along for when that had to be created.       9       So I just used some industry averages around       10       if under Scenario 2 was a fire sale, so we're not         11       A       Other than the cleanup process I spoke to       12       going to do any new projects, so all of our <td< th=""><th>20</th><th>Morgan Stanley?</th><th>20 Q All right. As part of the planning for, I</th></td<>	20	Morgan Stanley?	20 Q All right. As part of the planning for, I
23       documents in the Intralinks database, and it looks like       23       A Yes.         24       when you look at them, the documents are all there.       24       Q Okay. Who provided you instructions on how to         25       When you go to open the documents, they're empty.       25       go about doing that?         Page 118         1       Do you know how that happened?       1       A No one.         2       A I think that's a permissions problem, I think.       Because there were times that I could see things and I       3         4       couldn't open them either but Steve could open them.       5       So, one, I would ask is you guys should check it       is it a permissions problem? If they truly aren't         7       there, I do not know.       6       I adactually stated engaging with a vendor to         10       Intralinks database?       10       if under Scenario 2 was a fire sale, so we're not         11       A Obter than the cleanup process I spoke to       12       going to do anything new. We're not going we're         13       Q Is it right that the highest level of       13       So the hought the concept there was we're         14       permission is what's called "manager plus."       14       not going to do anything new. We're not going we're         13       Q Is it right that the highest level of <th>21</th> <th>A Yes.</th> <th>21 believe, Scenario 2, you were asked to put together an</th>	21	A Yes.	21 believe, Scenario 2, you were asked to put together an
24       when you look at them, the documents are all there.       24       Q       Okay. Who provided you instructions on how to go about doing that?         25       When you go to open the documents, they're empty.       26       go about doing that?         Page 118         Page 118         Page 120         1       Do you know how that happened?       1       A No one.         2       A I think that's a permissions problem, I think.       2       Q       How did you come up with the number of         3       Because there were times that I could see things and I       A No one.       Q       How did you come up with the number of         5       So, one, I would ask is you guys should check it       is it a permissions problem? If they truly aren't       A A lot of it like I said earlier, I had         6       is it a permission sy documents within the       5       For enough along for when that had to be created.         9       bankers to delete or alter any documents within the       9       So I just used some industry averages around         10       Intralinks database?       10       if under Scenario 2 was a fire sale, so we're not         13       Q       Is it right that the highest level of       5       pist right that the highest level of         14       permission is what's	22	Q So we went in recently and looked at the	22 IT headcount reduction. Do you remember that?
25       When you go to open the documents, they're empty.       25       go about doing that?         Page 118         1       Do you know how that happened?       1       A No one.         2       A I think that's a permissions problem, I think.       2       Q How did you come up with the number of         3       Because there were times that I could see things and I       2       A A lot of it – like I said earlier, I had         5       So, one, I would ask is - you guys should check it -       6       is it a permissions problem? If they truly aren't         7       there, I do not know.       8       Q Do you know if anybody ever instructed the       9         9       bankers to delete or alter any documents within the       9       So I just used some industry averages around         10       Intralinks database?       1       a I don't know. It may be. I don't know.         13       Q Is it right that the highest level of       13       So the thought – the concept there was were         14       permission is what's called "manager plus."       16       iging to do any new projects, so all of our         15       A I don't know. It anybe. I don't know.       16       just run our systems.         16       Q But McInall would know that?       So it was just – it was a lot of assumptions         16       <	23	documents in the Intralinks database, and it looks like	23 A Yes.
Page 118Page 1201Do you know how that happened?1A No one.2A I think that's a permissions problem. I think.1A No one.3Because there were times that I could see things and I3headcount to be reduced?4couldn't open them either but Steve could open them.5So, one, I would ask is you guys should check it5So, one, I would ask is you guys should check itis it a permissions problem? If they truly aren't66is it a permissions problem? If they truly aren't6and I had actually started engaging with a vendor to7there, I do not know.7look at opportunities within IEA as well. We were not8Q Do you know if anybody ever instructed the9So I just used some industry averages around9Intralinks database?10if under Scenario 2 was a fire sale, so we're not11A Other than the cleanup process I spoke to11going to do anything new. We're not going we're12going to do anything new. We're not going we're12going to do any new projects, so all of our14permission is what's called "manager plus"?14not going to do any new projects, so all of our15A I don't know. It don't know.16just run our systems.17A Yes. And that might be what he gave me. It17So it was just it was a lot of assumptions18might be manager plus. I don't know.10it would were dord that we engaged had nothing to do20Q We talked a little bit about the A	24	when you look at them, the documents are all there.	24 Q Okay. Who provided you instructions on how to
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30 (Pages 117 to 120)

	Page 121		Page 123
1	various sourcing opportunities. They still have an	1	Q Yes.
2	engagement with JEA today on some things.	2	A I watched a portion until I had to leave for a
3	Q Do they relate specifically to IT or staffing	3	meeting.
4	in general?	4	Q Do you remember, as you were watching that
5	A IT. They may do more than that. I know them	5	meeting, any of the witnesses saying anything that you
6	as IT.	6	considered to be either untruthful or misleading or
7	Q Was it your understanding that the Scenario 2	7	confusing?
8	was intended to be a worst-case scenario?	8	A Confusing, yes. Untruthful or I didn't
9	A Yes.	9	know enough to know.
10	Q What was the best-case scenario?	10	Q What did you consider to be confusing?
11	A We grow and continue to grow and not have to	11	A I think what everyone else did. I thought it
12	raise rates for ratepayers.	12	was very confusing that we didn't know some of the
13	Q And that was Scenario 3?	13	answers.
14	A I think so. I think so.	14	Q Confusing that "we," meaning whom?
15	Q You talked about the banks earlier. Were you	15	A Sorry. That JEA didn't know how things were
16	involved in working with the banks?	16	calculated or didn't know how things came about, I
17	A No.	17	thought that was odd.
18	Q Did you have any kind of access to Intralinks	18	Q Do you think that somebody on the senior
19	before Steve McInall gave you access six weeks ago?	19	leadership team probably knew the answers to those
20	A Yes. Yes. As I had mentioned, all the SLT	20	questions?
21	was given access early on to fill the data room, and	21	A I don't know.
22	some of them also got people on their teams access. I	22	Q Mr. Kendrick testified this week that
23	didn't. I just had my team filter me all the documents	23	Ms. Dykes told him that Aaron Zahn had all of the
24	and I uploaded them. So I had access to be able to	24	numbers related to the PUP in his head.
25	upload documents.	25	Did he ever say anything like that to you?
	Page 122		Page 124
		1	
1	As the project went further, our access got	1	A He never said that to me.
1 2	As the project went further, our access got reduced down. Like after we had loaded the documents	1 2	<ul><li>A He never said that to me.</li><li>Q Did you ever overhear him talk about the</li></ul>
	reduced down. Like after we had loaded the documents and then they were starting to do work in it, it got	1	Q Did you ever overhear him talk about the numbers related to the PUP?
2	reduced down. Like after we had loaded the documents and then they were starting to do work in it, it got reduced down, and I didn't go back in it. You can tell	2	Q Did you ever overhear him talk about the
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2 3 4	reduced down. Like after we had loaded the documents and then they were starting to do work in it, it got reduced down, and I didn't go back in it. You can tell from the one document I obviously pulled some documents in November, but yeah, that was	2 3 4	<ul><li>Q Did you ever overhear him talk about the numbers related to the PUP?</li><li>A No. The PUP was the biggest mystery that,</li></ul>
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31 (Pages 121 to 124)

	Page 125	Page 127
1	been disclosed to the board during the public board	1 A Yes, I was not involved.
2	meetings?	2 Q Okay. And don't even know about the process?
3	A That's not my job, so I don't I don't	3 A No.
4	know I just think there was a lot of data there that	4 Q Do you know if there were any other public
5	felt that could have been important information.	5 records requests to JEA that were not sent through Jasen
6	Q That you felt like was important information?	6 Hutchinson in connection with all of the recent issues
7	A That I felt was important information.	7 at JEA?
8	Q And that if it were up to you and you were	8 A I'm not.
9	making these presentations to the board that you would	9 Q So to your knowledge, they all went through
10	have disclosed to the board?	10 Jasen?
11	A I'm not the CEO and do not want to be.	11 A Yes.
12	Q But I think that's what you're getting at is	12 Q And would that be standard operating protocol?
13	that you felt like there was information in these	13 A Yes.
14	documents that should have been disclosed but that	14 Q Do you know whether anyone at JEA ever told
15	wasn't by the people that were making the presentations?	15 anyone at Hill Ward Henderson about the existence of
16	A Hindsight is always very interesting, and I	16 these three email addresses and tablets related to the
17	think when you see the information, you ask yourself why	17 non-JEA employees on the negotiation team for the ITN?
18	wasn't that disclosed, and I agree with that statement.	18 A Can you ask that again?
19	Q Now, we have the benefit of hindsight	19 (Record read by reporter.)
20	A Yes.	20 THE WITNESS: The answer is I'm not aware.
21	Q so we can look back at this and realize	21 I've learned a lot today about this.
22	that there was information that was available to some	22 BY MR. WEDEKIND:
23	people who were making presentations to the board, but	23 Q Did you have any interaction with any of the
24	that while you were watching the board meetings, you	2.4 attorneys at Pillsbury?
25	recognized you recognize now that that information	25 A No.
	D	D 100
	Page 126	Page 128
1		
1 2	Page 126 wasn't provided to the board? A Yes.	1 Q Did you have any interaction and by
	wasn't provided to the board? A Yes.	1 Q Did you have any interaction and by
2	wasn't provided to the board? A Yes.	1 Q Did you have any interaction and by 2 interaction, I mean an in-person meeting, a telephone
2 3	<ul><li>wasn't provided to the board?</li><li>A Yes.</li><li>Q Were you involved in responding to the request</li></ul>	<ol> <li>Q Did you have any interaction and by</li> <li>interaction, I mean an in-person meeting, a telephone</li> <li>call, a text, anything.</li> </ol>
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32 (Pages 125 to 128)

	Page 129	Page 13
1	Q Okay. In the work that Foley & Lardner did	1 A No, other than to connect with her on
2	for JEA, did you interact at all with any of the lawyers	2 LinkedIn, but there was no conversation.
3	at Foley & Lardner?	3 Q It was just a connection?
4	A No.	4 A Connect, that was it.
5	Q And the work that was done on the PUP, the	5 Q How about Mr. Vinyard, have you had any
6	employment agreements, any of the board packages related	6 communications with him?
7	to all of the scenario planning or the ITN, did you	7 A No.
8	interact at all with Lynne Rhode?	8 Q Ryan Wannemacher since he left?
9	A About those topics with Lynne Rhode, no.	9 A No.
10	Q About what topics did you interact with her	10 Q Melissa Dykes?
11	during that time period?	11 A Yes.
12	A Lynne being our, you know we we have	12 Q What were your communications with Ms. Dyke
13	business with telecom, pole attachments, various things	13 A So as I talked earlier about trying to get the
14	with vendors that we do business with from a telecom	14 pin for the iPad. Melissa had reached out to me the day
15	perspective, that I would have interacted with Lynne	15 that we were let go and just talked to me. It was
16	about.	16 nothing really about JEA. It was more personal. That's
17	Lynne taught us you know, helped us go	17 it. Nothing about JEA really.
18	through some ethics training, some public records	18 Q Why do you think that she did that?
19	things. So I interacted with Lynne from that	19 A She did say one thing to me. I will tell you.
20	standpoint, being a part of the senior leadership team.	20 I think that's just Melissa. I think Melissa
21	Q She had a JEA email address; correct?	21 appreciated my skill set and appreciated what I did,
22	A Yes.	22 thought that I was good at my job and that I was caught
23	Q Did she have a JEA-assigned computer or	23 up in something and wished me the best. She knew that
24	tablet?	24 had moved my whole family here, and it wasn't even a
25	A Yes.	25 <b>year.</b>
	Demo 120	Daga 13
	Page 130	Page 13
1	Q Both?	1 She did at the very end say to me, don't
2	Q Both? A I do not know.	<ol> <li>She did at the very end say to me, don't</li> <li>forget that there's a policy about SLT severance, which</li> </ol>
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	Page 133		Page 135
1	A Other than the opinion that it's tough and	1	look like. And there was conversations around that.
2	that we were caught in the middle of it.	2	And I think there was conversations around,
3	Q That was her opinion expressed to you?	3	you know, a hypothetical of how could you take care of
4	A Yes.	4	the community and take care of employees and, you know,
5	Q She say anything about any current OGC	5	take care of all of that together in some kind of
6	attorneys?	6	scenario, and that's kind of the discussions that we
7	A No, not at all.	7	had.
8	Q Do you know who Kort Parde is?	8	Q So was there ever a discussion between the SLT
9	A I do not.	9	members at Ponte Vedra about the possibility of the
10	Q Did you have the opportunity to witness	10	senior executives becoming rich as a result of the
11	Lynne Rhode and Herschel Vinyard's working relationship?	11	recapitalization?
12	A On the 16th floor I saw them interact.	12	A I think there was a moment where something was
13	Q How frequently would you say that they	13	said like that flippantly.
14	interacted in connection with their jobs?	14	Q Who said it?
15	A I don't know. I would think on a daily basis.	15	A I think it might have been Aaron.
16	Q Do you know that there was any kind of	16	Q So exactly what did he say? You just
17	segregation of documents or files by Miriam Hill or	17	described it as "flippantly."
18	Lynne Rhode because they were technically employed by	18	A I don't remember. I don't remember.
19	OGC?	19	Q But you do remember him saying something about
20	A Not that I'm aware of.	20	the executives getting rich as a result of a recap?
21	Q Did they have the ability to save documents on	21	A So I actually remember him saying it wouldn't
22	the JEA system?	22	just be the executives.
23	A Yes.	23	Q So everybody was going to get rich as a result
24	Q You talked earlier about the I think it was	24	of a recap?
25	the June meeting at Ponte Vedra, and you talked about	25	A It wasn't that if something happened, there
	Do no. 124		
		1	Page 136
1	Page 134	1	Page 136
1	various concepts were discussed at that meeting.	1	was ways to take care of folks and to reward them for
2	various concepts were discussed at that meeting. What concepts were discussed at that meeting?	2	was ways to take care of folks and to reward them for all of their service, that was I remember the
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34 (Pages 133 to 136)

	Page 137		Page 139
1	what their job is. Then the City Council had to vote on	1	MR. NICHOLS: Excuse me for adding, for
2	it and approve it as well. And then the people, I	2	enhancing his testimony.
3	thought there had to be a referendum where the people	3	BY MR. WEDEKIND:
4	would then have to vote on it.	4	Q Did you consider Lynne Rhode to be a JEA
5	So do I think it could have helped make people	5	attorney?
6	work on it? Yes. But ultimately I felt the bar before	6	A Yes. I knew she worked for OGC, but yes.
7	a "yes" would ever happen was so high that we had a heck	7	Q Do you know how frequently she interacted with
8	of a lot of work to do to get there.	8	the Pillsbury law firm?
9	Q Earlier you described Mr. Zahn, Ms. Dykes,	9	A No.
10	Mr. Wannemacher, and Mr. Vinyard as a team. Did you	10	Q Do you know how frequently she interacted with
11	consider them to be a team within the senior leadership	11	the Foley law firm?
12	team?	12	A No.
13	A Yes.	13	Q Where were your offices relative to one
14	Q Why?	14	another?
15	A Originally, I reported to Julio. So there was	15	A So opposite side of the building, diagonally.
16	a structure that was Aaron, Ms. Dykes, Mr. Wannemacher,	16	She was diagonal kind of. I mean, Herschel was directly
17	Julio, and Herschel. And then there were those of us	17	diagonal. She was down a few. I was in a corner by
18	that reported to them. And the previous CEO, all those	18	myself. I'm the geek.
19	reported directly to the CEO.	19	Q You had talked earlier about some texts that
20	So there was actually a structure when I first	20	you got from Mr. Zahn. What was the telephone number he
21	started where we were not part of that team. When Julio	21	used? Can you just read it?
22	left, I reported to Aaron, but I didn't I didn't go	22	A Sure. (312) 286-1040.
23	to every staff meeting of Aaron's. I was invited to	23	Q How is he identified in your phone?
24	every other week. So there was work being done that I	24	A Aaron Zahn, JEA.
25	was not a part of.	25	Q I think that you answered this generally, and
	Page 138		Page 140
1	Page 138 Ouite honestly, if you also look at the	1	Page 140
1	Quite honestly, if you also look at the	1	so at the risk of repeating myself, I'm going to ask a
1 2 3	Quite honestly, if you also look at the agreements, there's a tier in them, as far as the	2	so at the risk of repeating myself, I'm going to ask a very, very specific question.
2	Quite honestly, if you also look at the agreements, there's a tier in them, as far as the employment agreements are concerned.	1	so at the risk of repeating myself, I'm going to ask a very, very specific question. Are you aware of any public records requests
2 3	Quite honestly, if you also look at the agreements, there's a tier in them, as far as the employment agreements are concerned. Q Did you ever perform any internal calculations	2 3	so at the risk of repeating myself, I'm going to ask a very, very specific question. Are you aware of any public records requests in 2019 or 2020 that were addressed by the 16th floor
2 3 4	Quite honestly, if you also look at the agreements, there's a tier in them, as far as the employment agreements are concerned. Q Did you ever perform any internal calculations in your head about what the PUP might be worth in the	2 3 4	so at the risk of repeating myself, I'm going to ask a very, very specific question. Are you aware of any public records requests
2 3 4 5	Quite honestly, if you also look at the agreements, there's a tier in them, as far as the employment agreements are concerned. Q Did you ever perform any internal calculations	2 3 4 5	so at the risk of repeating myself, I'm going to ask a very, very specific question. Are you aware of any public records requests in 2019 or 2020 that were addressed by the 16th floor without involving Jasen Hutchinson? A No.
2 3 4 5 6	Quite honestly, if you also look at the agreements, there's a tier in them, as far as the employment agreements are concerned. Q Did you ever perform any internal calculations in your head about what the PUP might be worth in the event of a recapitalization?	2 3 4 5 6	so at the risk of repeating myself, I'm going to ask a very, very specific question. Are you aware of any public records requests in 2019 or 2020 that were addressed by the 16th floor without involving Jasen Hutchinson? A No. Q Were you involved in any way in the response
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1	CERTIFICATE OF OATH	1 ERRATA SHEET
2	STATE OF FLORIDA )	2 DO NOT WRITE ON TRANSCRIPT-ENTER CHANGES HERE
3	COUNTY OF DUVAL )	3
4	I, the undersigned authority, certify that	IN RE: AARON ZAHN-TERMINATION OF EMPLOYMENT
5	SHAWN EADS personally appeared before me and was duly	4 AGREEMENT WITH JEA
6 7	sworn.	5
8	WITNESS my hand and official seal this 6th day	PAGE NUMBER LINE NUMBER CHANGE REASON
9	of July, 2020.	7
10		8
11	1/when a line and the	9
	Heather M. Thomas	10
12	Court Reporter	11
13	Notary Public-State of Florida My Commission No. GG 281865	13
10	My Commission Expires 2/1/2023	14
14		15
15		16
16		17
17		18
18		19
19		20 Under penalties of perjury, I declare that I have read my deposition and that it is true and correct subject to
20 21		21 any changes in form or substance entered here.
21		22 any changes in form of substance entered here.
23		23 DATE NAME
24		24
25		25
	Page 142	
1	CERTIFICATE OF REPORTER	
2		
3		
4	STATE OF FLORIDA	
5	COUNTY OF DUVAL	
6		
7	I, HEATHER M. THOMAS, Court Reporter and Notary	
8	Public, State of Florida, was authorized to and did	
9	stenographically report the foregoing proceedings; and	
10	that the transcript, Pages 4 through 142, is a true and	
11 12	accurate record of my stenographic notes. I further certify that I am not a relative, or	
13	employee, or attorney, or counsel of any of the parties'	
14	attorney or counsel connected with the action, nor am I	
15	financially interested in this action.	
16	DATED this 6th day of July, 2020.	
17		
18	Huller of Alexand	
	Heather M. Thomas	
19	Court Reporter	
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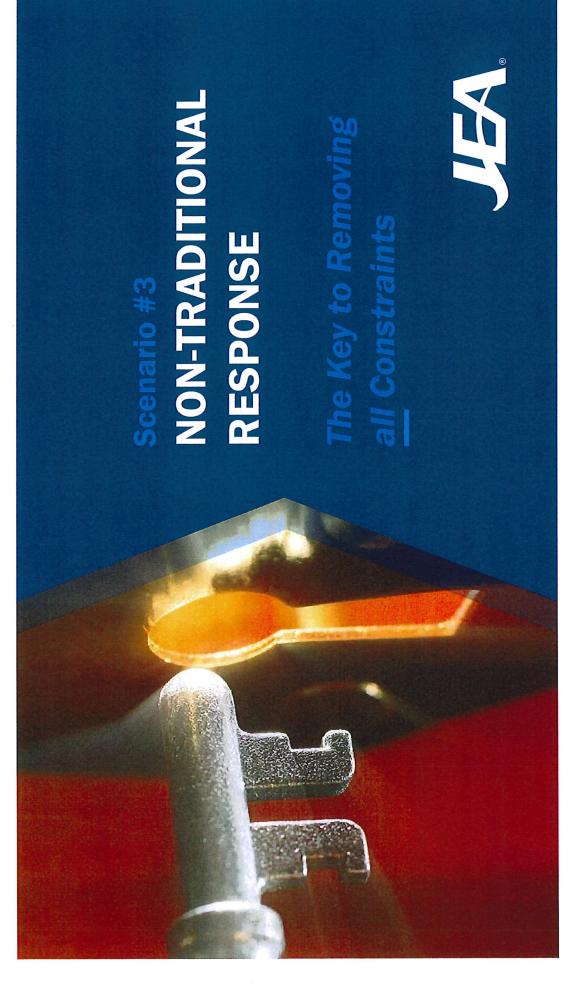
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Jane 9, 200 Jane 9, 200 Saran Edd Dai McDiny, Janeia CDO, JEA Satament of Righer/Carrily Warning	<b>STATEMENT OF RUCHTS</b> <b>STATEMENT OF RUCHTS</b> There requested that the Office of General Investigates your conduct as a JEA employee you request Y over failure and the Office of General Investigates your conduct as a JEA employee promptly responding to request for documents and information and appending for an interview promptly responding to request for documents of the Office of General Instance promptly responding to request for documents and information and appending promptly responding to request for documents and information and appending the interview of the output of the problem and the following rights and responsibilities during this investigation: . You will be added questions specifically directed and annovly, related to the performance of your official dotte. . Statement and during any interviews may be used as ordence of misconduct or as the basis for reaching deciplinary action against you. . Any statement media protecting and removal your misconduct in y subsequent criminal proceeding accessing accessing the ordence of misconduct any subsequent criminal proceeding accessing and the protect to used against you. . The request is protecting and representing theore interviews transit to and against you. . The request as protecting accessing accessing theore interviews transit to use a without any subsequent criminal proceeding accessing theore are the fourty of your miscandors by used any subsequent criminal proceeding.	• Return to some of the number of the numer of the number of the number of the number of t
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WHY JEA IS DEVELOPING A NON-TRADITIONAL STRATEGIC PLAN The industry is changing and JEA's strategy needs to change	<b>OBJECTIVES:</b> Develop a 10-year strategy for JEA that drives an increase in the value of JEA now and into the future. The strategy will:	Position JEA to succeed in the face of trends	Proactively shape talent and culture	Drive growth in value (CCEF)	Identify and enable growth investments	Maintain affordability and reliability for customers	TEA
WHY JE The indu	ii O	6				°	



TRADITIONAL APPROACHES LEAD TO DECREASES IN CORPORATE MEASURES OF VALUE

	LAST 10 YEARS	SCENARIO 2a: TRADITIONAL RESPONSE	SCENARIO 2b: SOME REMOVAL OF GOVERNMENT CONSTRAINTS
<b>CUSTOMER VALUE</b>	•	•	0
COMMUNITY IMPACT VALUE	•	•	0
<b>ENVIRONMENTAL VALUE</b>	¢	•	•
FINANCIAL VALUE	¢	0	0

Alleviating some restraints only delays the inevitable
Declines in value due to additional market forces
In the face of declining sales, customer rates increased 71%

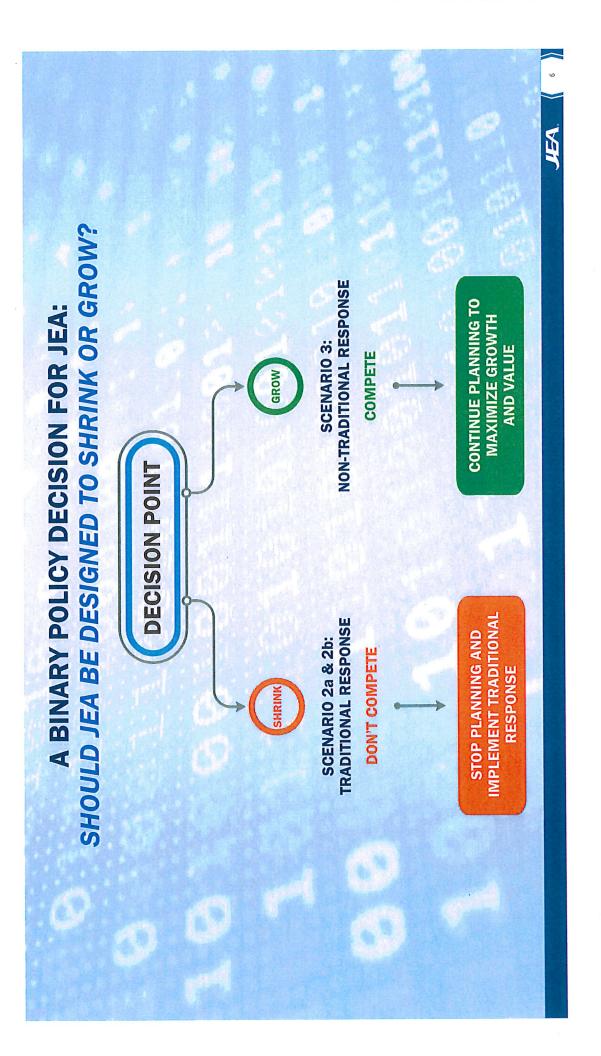
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BUSINESS OPPORTUNITIES	LAST 10 YEARS	SCENARIO 2a: TRADITIONAL RESPONSE	SCENARIO 2b: SOME CONSTRAINTS REMOVED
Sell more electric and water services	8	8	8
Cut costs and workforce	0	0	•
Increase customer rates	0	0	•
Investment in R&D and IP for an ROI	8	8	8
Sell alternative new product lines or offerings	8	8	0
Sell equity and retire debt	8	8	8
Acquire new businesses & customers	8	8	0
Reduce investment in capex	•	•	•
Reduce dividend / city contribution	8	8	0
Sell assets	8	8	0
Create partnerships / joint ventures	8	8	8

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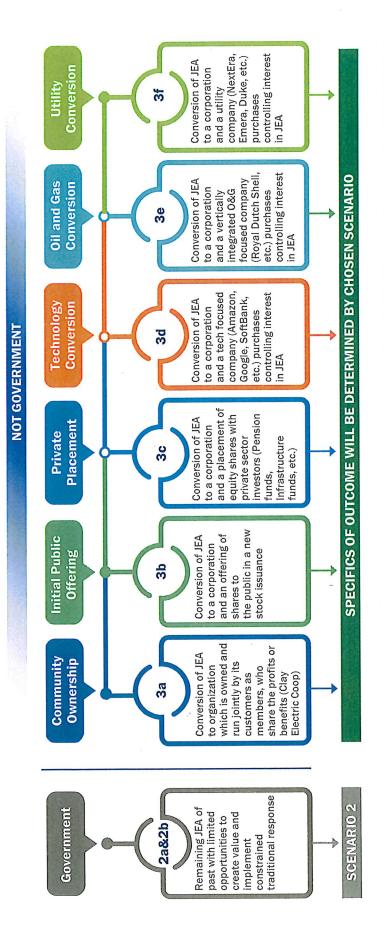
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**DEFINE THE ROOT PROBLEM:** 

The problem is not being community-owned;

The problem is being government with government constraints in a competitive market.

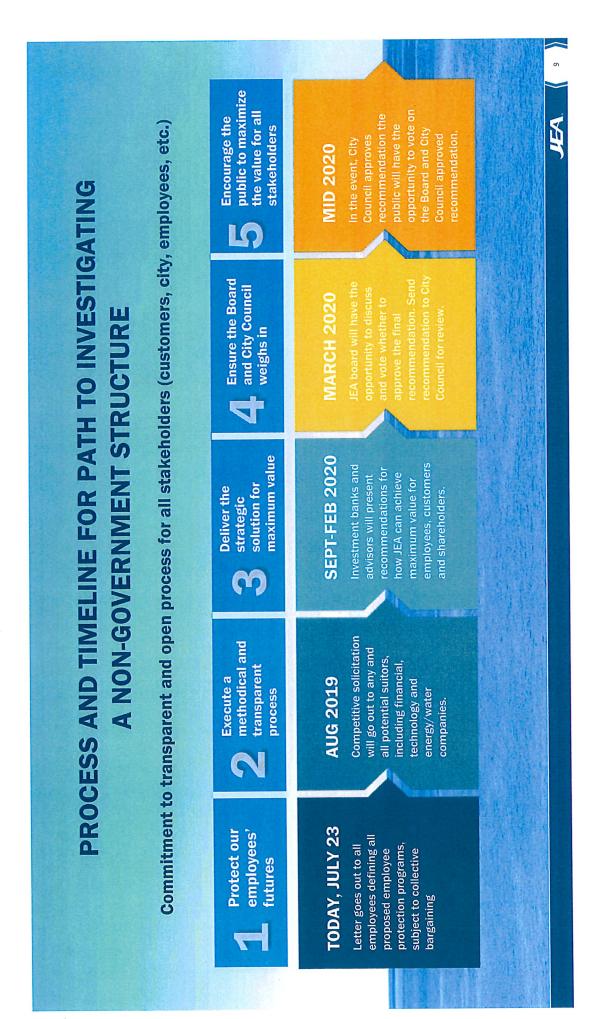




**CONSTRAINT PROFILE OF ALTERNATE STRUCTURES:** 

While management cannot currently outline specifics of each alternative, it can provide an analysis of constraints

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3e	0&G Conversion	•	•>	•	۲	•	•	•	•	•	•	•
3d	Tech Conversion	•	•>	•	•	•	•	•	•	•	•	•
3c	Private Placement	•	•	•	•>	•	•	•	•	•	•	•
Зb	Initial Public Offering	•	•	۲	•	•	•>	•	•	•	•	•
<b>3</b> a	Community Owned	•>	•>	•	•	•	8	•	•	0	•	•
2a&2b	Government	8	•	•	8	8	⊗	8	•	⊗	8	⊗
	BUSINESS OPPORTUNITIES	Sell more electric and water services	Cut costs and workforce	Increase customer rates	Investment in R&D and IP for an ROI	Sell alternative new product lines/offerings	Sell equity and retire debt	Acquire new businesses & customers	Reduce investment in capex	Reduce dividend / city contribution	Sell assets	Create partnerships / Joint ventures



industry-wide transformation and help it achieve its vision to improve lives in the Northeast Florida Community. The overall purpose of this undertaking is to give JEA the strategic flexibility to adapt to a once-in-a-generation

	Status Quo	Minimum Requirements
Financial	<ol> <li>4\$2 billion of value to the City of Jacksonville<sup>1</sup></li> </ol>	<ol> <li>+\$3 billion of value to the City of Jacksonville</li> </ol>
Customers	<ol> <li>\$0 customer distributions</li> <li>Significant rate increases required over next several years</li> </ol>	<ol> <li>\$\$400 million of value distributed to customers (\$350+ paid to each JEA account - \$1,400+ for customers with electric, water, sewer and irrigation accounts)</li> <li>At least 3 years of contractually guaranteed base rate stability</li> </ol>
Environmental	<ol> <li>Viable renewable energy requirements at <u>0%</u> funding</li> <li>Viable sources of alternative water capacity at <u>0%</u> funding</li> </ol>	<ol> <li>Commitment to fund and provide City of Jacksonville and Duval County Public School system <u>100% renewable</u> electricity by 2030</li> <li>Commitment to fund and provide <u>40 million gallons per day</u> of alternative water capacity for Northeast Florida by 2035</li> </ol>
Community Impact	<ol> <li>Status quo retirement obligations</li> <li>No employment guarantees and <u>termination of ~600 employees</u></li> <li>No retention payments to employees</li> <li>JEA leaves downtown, moving new headquarters to existing office space to house smaller workforce and minimize cost</li> </ol>	<ol> <li>Protection of certain employee retirement benefits</li> <li>Guarantee of employee compensation and benefits for <u>three (3) years</u></li> <li>Retention payments to all full-time employees of <u>100% current base</u></li> <li>Compensation</li> <li>Commitment to new headquarters and employees in downtown Jacksonville contributing to the economic development of the community</li> </ol>
<sup>1</sup> NPV of JEA's expected co	<sup>4</sup> NPV of JEA's expected contribution to the City of Jacksonville over the next 20 years	

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## WHY PROTECT EMPLOYEE PENSIONS?

## NUMBER ONE ASSET

JEA's employees are critical to providing reliable, safe, affordable, and clean utility service to our community now and in the future.

### SOCIAL SECURITY

As government employees, most JEA employees are in a defined benefit pension program and do not pay into social security as an additional retirement benefit. Any change in structure would automatically terminate employee participation

## **ENSURE A NEST EGG**

As part of considering any restructuring, we recommend the Board give each employee the assurance that his or her retirement nest egg will be protected

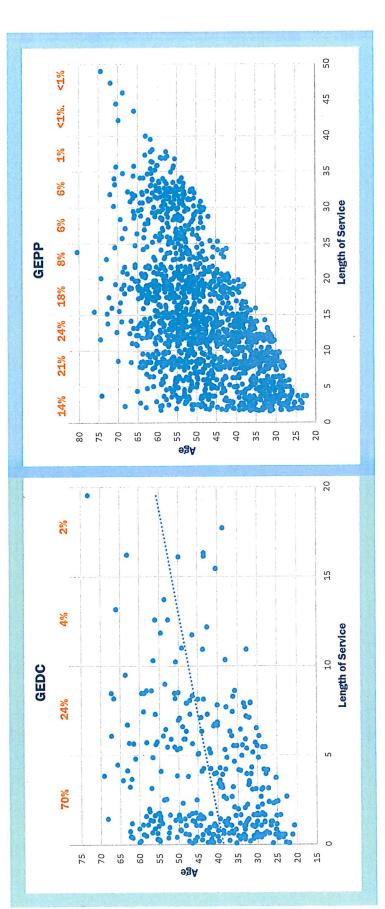
## **VESTING EMPLOYEES**

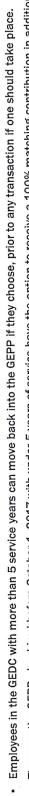
We recommend the Board consider pension legislation changes that protect vested employees by increasing years of service credit and non-vested employees by vesting them in the pension 11

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Those on the GEPP plan hired before October 1, 2017 with under 5 years of service have the option to receive a 100% matching contribution in addition to what they invested to date.

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JEA

# **EMPLOYEE PENSION SCENARIO EXAMPLES**



Katelyn will receive 24 additional years of service credit on top of her 6 years served, which will result in her having a 30-year pension she can begin receiving at age 50 (75% of her current salary)



Frank will receive 2 additional years of service credit on top of his 18 years served, which will result in his having a 20-year pension he can begin receiving at age 55 (50% of salary)



# NECESSARY ACTIONS THE BOARD OF DIRECTORS SHOULD TAKE TO PROVIDE PEACE OF MIND

<ul> <li>Pension</li> <li>Pension</li> <li>Retention</li> <li>Retention</li> <li>Retention</li> <li>Commit to base rate freeze during competitive process</li> </ul>	EMPLOYEES	CUSTOMERS & COMMUNITY	BOND INVESTORS
	<ul> <li>Pension</li> <li>Retention</li> </ul>	<ul> <li>Commit to base rate freeze during competitive process</li> <li>Commit to open competitive process</li> </ul>	<ul> <li>Board and Management continued commitment to operational and financial excellence</li> </ul>

**JEA**. 14

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January 15, 2019

Dear Shawn Eads:

It is my pleasure to confirm our offer for the Chief Information Officer position. With your skillset and demonstrated experiences, we are confident that you will be a great asset and member of the JEA team.

The following summarizes the details of this offer:

Location:	21 W. Church Street, 16 <sup>th</sup> floor, JEA Tower
Report to:	Chief Innovation and Transformation Officer
Base Salary:	\$275,017.60 annual, paid biweekly
Business Allowance:	\$700.00 per month
Parking Allowance:	\$50.00 per month
Relocation Allowance:	Three quotes to be submitted, reimbursement for the lowest quote
Start Date:	March 15 <sup>th</sup> or mutually agreeable start date

Please see attached for information regarding JEA benefits and pension plans. A benefits representative will be available to answer questions at New Hire Orientation. If you have any questions regarding your benefits prior to New Hire Orientation, please call 904-665-5300.

Below is a summary of benefits, which begin on your first day of employment.

Health Care Benefits: Provided through Florida Blue, plan options include a PPO, HRA and an HSA. Please refer to the JEA Benefits Booklet attachment for employee costs.

Dental Plan: United Concordia is the dental plan provider. There is both a DHMO and a PPO plan.

Vision Plan: EyeMed is the vision plan provider.

Life Insurance: Life insurance is provided at three times your annual salary (\$500,000 maximum).

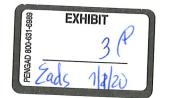
Flexible Spending Account: JEA offers a plan that allows you to make tax-free, bi-weekly deposits into an account for health care and dependent care expenses.

**Paid Time Off**: Leave is accrued biweekly at a rate of 6.16 hours, this equals 4 weeks annually. In addition, JEA observes eleven paid holidays and provides one floating holiday.

### **Retirement Planning**

Defined Contribution Plans:

- General Employee Defined Contribution Plan is the retirement plan in lieu of Social Security where the employee contributes 8% (pre-tax) and company contributes 12% of earnable compensation. This plan includes a generous vesting schedule, which begins after two years with 100% vesting upon the conclusion of 5 years of credited service; in addition,



JEA 401(a) Defined Contribution Plan is a voluntary retirement plan, with immediate vesting, where the company automatically contributes 2% of eligible earnings. The employee may make a one-time, irrevocable election at hire to defer up to 20% of annual eligible earnings.

Deferred Compensation Plan:

- The JEA 457 is also a voluntary plan, with immediate vesting, where the employee may defer a percentage election of their eligible compensation on a pre-tax and/or Roth after-tax contribution.

\*Please note the above Plans are subject to the respective IRS limits.

This offer is contingent upon successfully passing our company's background check. In addition, in order to comply with federal law, JEA participates in the E-Verify verification process.

We are excited about you joining our team and we look forward to the contributions you will make to JEA!

Sincerely yours,

Angelia Hiers JEA-VP & Chief Human Resources Officer 904-665-4747

Employee Acceptance: Please email (<u>recsel@jea.com</u>) or fax (904-665-6192) your acceptance or declination of this offer.

Accept Offer

\_\_\_\_Decline Offer

Employee Acceptance: Date: 1-16-19 Cado BY:

Signature

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		,		
Employer Acceptance:				
BY:SAME IL	Date:	11	le	(9
Signature Talent Acquisition Services			ì	

Attachment: Benefits Supplement Sheet

# Exhibit 4 - Being reviewed

### **REQUEST FOR DOCUMENTS TO JEA**

Pursuant to the Charge of the Special Investigatory Committee on JEA Matters ("Committee") issued by the Jacksonville City Council President on February 4, 2020, the Committee met on February 10, 2020 and by resolution issued this Request for Documents. It is requested that JEA produce the documents designated below through the Office of General Counsel as soon as reasonably possible.

### **Instructions**

Produce all documents responsive to each request that are in JEA's possession, custody, and control, including all responsive documents within the possession of JEA's agents, employees, consultants, and attorneys.

If a request references a person or entity by name, the request includes all of the past and present directors, officers, managers, members, shareholders, agents, attorneys, accountants, advisors, consultants, contractors, subcontractors, employees, representatives, and any other persons or entities acting on their behalf.

Produce ESI in its native or near native form. Do not convert ESI to an imaged format (e.g., \*.TIF or \*.PDF).

All requests must be interpreted to include any attachments, amendments, exhibits, schedules, and drafts for any responsive documents.

### **Definitions**

"Document(s)" shall include, without limiting the generality of the foregoing, correspondence, contracts, agreements, leases, memoranda, notes, calendar and diary entries, memoranda or notes of conversations and of meetings, studies, reports, offers, inquiries, bulletins, summaries, newsletters, compilations, charts, graphs, photographs, film, microfilm, articles, announcements, books, books of account, ledgers, vouchers, canceled checks, invoices, bills, opinions, certificates, transcripts and all other tangible things upon which any handwriting, typing, printing, drawings, representation, ESI (electronically stored information, as defined below), magnetic or electrical impulses or other form of communication is recorded, now or at any time in your possession, custody or control, including but not limited to the originals (or any copy when originals are not available) and drafts of documents and all copies that are different in any way from the original.

"ESI" means electronically stored information in all forms in which it is stored and communicated. ESI specifically includes emails, word processing files, electronic documents, spreadsheets, presentations, databases, images, movies, audio files, voicemails, text messages, and any other information stored on any computer, laptop, tablet, cell phone, smartphone, external hard drive USB drive, cd drive, dvd drive, backup drive, SharePoint site, file server, or in any remote or " cloud" -based system or location, including Dropbox. ESI specifically includes, without limitation, all of the following electronic file types: \*.msg, \*.pst, \*.eml, \*.jpg,



\*.tif, \*.gif, \*.mov, \*.mpg, \*.mpeg, \*.wmv, \*.avi, \*.wav, \*.mp3, \*.doc, \*.docx, \*.wpd, \*.xls, \*.xlsx, \*.ppt, \*.pptx, \*.mdb and \*.pdf. ESI also includes social media data, including information stored by you or communicated by you through Facebook, Twitter, LinkedIn, Skype and blogs. ESI also includes business or personal email accounts such as Yahoo Mail, Gmail, Hotmail, Outlook.com, AOL mail and other web-based email services.

"Inquiry Matters" means the Total Market Compensation Strategy, privatization or recapitalization of JEA, ITN, and PUP.

"ITN" means the Invitation to Negotiate #127-19 issued by JEA to evaluate proposals on strategic alternatives.

"PUP" means the Long-Term Incentive Plan known as the Performance Unit Plan presented to, and approved by, the JEA Board on July 23, 2019.

"SLT" refers to JEA's past and present Senior Leadership Team.

### **Timeframe**

December 1, 2017 through the present unless otherwise specified.

### Requests

1. All documents and communications regarding the planning, approval, or implementation of the Total Market Compensation Strategy.

2. All documents regarding the drafting of the Performance Unit Plan, or any long-term incentive plan for JEA.

3. All presentations, reports, and memoranda provided by Willis Towers Watson to JEA.

4. All calendar entries regarding meetings with Willis Towers Watson.

5. All communications with Willis Towers Watson.

6. All documents regarding the inclusion of OGC attorneys and/or other non-JEA employees as participants in the PUP.

7. All documents regarding the number of Performance Units that could be purchased by any employee, or class of employees, under the PUP.

8. All documents regarding the cost of PUP units for participants.

9. All documents describing, summarizing, or explaining the terms of the PUP.

10. All documents regarding the potential or estimated cost to JEA of the PUP.

11. All documents and communications regarding the value of each PUP unit upon the occurrence of a recapitalization event or the formula for determining that value.

12. All documents regarding budgeting of, or allocation of funds for, payments under the PUP.

13. All memoranda or presentations provided to the JEA Compensation Committee or any of its members.

14. All communications between McKinsey and JEA.

15. All presentations, reports, and memoranda provided by McKinsey to JEA.

16. All agreements with McKinsey.

17. All invoices from McKinsey.

18. All documents and communications that JEA sent to or received from Public Financial Management.

19. All communications regarding the preparation of the Board packets for the May, June, and July 2019 JEA Board Meetings.

20. All calendar entries regarding meetings between Aaron Zahn or other SLT members and JEA Board members between December 1, 2017 and the present.

21. All documents regarding the use of the historic metrics for JEA included in the May, June, and July 2019 presentations to the JEA Board, including the number of employees and the comparison of rates over time.

22. All documents regarding the forecasting of JEA revenues, expenses, sales or customer demand.

23. All documents regarding the forecasting of grid parity and solar adoption in JEA's territory.

24. All documents regarding the rate of adoption of solar power by JEA customers from January 1, 2018 through the present.

25. All documents regarding industry forecasts, trends, or expert opinions regarding same.

26. All documents regarding the delegation of authority to negotiate the employment contracts with Aaron Zahn or other members of the SLT which were approved by the Board on July 23, 2019.

27. All documents regarding the drafting or terms of the employment contracts with Aaron Zahn or other members of the SLT which were approved by the Board on July 23, 2019.

28. All correspondence between Aaron Zhan and other members of the SLT and Camille Lee-Johnson regarding the PUP or the ITN.

29. All communications between Aaron Zahn and Alan Howard.

30. All communications between Aaron Zahn and April Green.

31. All communications between Aaron Zahn and Camille Lee Johnson.

32. All communications between Aaron Zahn and Pillsbury Winthrop Shaw Pittman LLP or Foley & Lardner, LLP regarding Alan Howard, Milam Howard Nicandri Gillam & Renner, P.A., or success based fees.

33. All documents, including drafts of the PUP or PUP agreement, that JEA sent to or received from Pillsbury Winthrop Shaw Pittman LLP or Foley & Lardner, LLP regarding any of the Inquiry Matters.

34. All documents and communications that JEA sent to or received from MassMutual regarding any of the Inquiry Matters.

35. All calendar entries regarding meetings between any JEA employee and Alan Howard from January 1, 2018 through the present.

36. All calendar entries regarding meetings between any JEA employee and any member or employee of Pillsbury Winthrop Shaw Pittman LLP or Foley & Lardner, LLP from January 1, 2018 through the present.

37. All calendar entries regarding meetings between any JEA employee and any member or employee of Foley & Lardner, LLP from January 1, 2018 through the present.

38. All documents and communications regarding JEA's scenario-based strategic planning, including all documents and communications regarding efforts to assess the viability of each scenario and the dates of those efforts.

39. All documents and communications regarding the ITN, including documents identifying when any SLT members began discussing the ITN, and all documents provided in response to the ITN.

40. All documents regarding the use of data rooms or other storage of information in conjunction with ITN and responses.

41. All documents regarding the estimated or potential costs associated with the drafting of the ITN, its publication, due diligence related to the ITN, negotiation and drafting of a proposed agreement, and any other actions necessary to bring an offer to the Board for review and approval.

42. All documents regarding inclusion of funds in the JEA budget for the cost of the ITN and PUP.

43. All agreements, communications, or other documents sent to or received from ADP.

44. All documents regarding any payments made to ADP.

45. All communications regarding the use, or potential use, of ADP for payroll services.

46. All documents regarding the selection or procurement of any contracts with ADP.

47. All documents regarding approval and payment of reimbursements to any member of the SLT for travel or any other expenses from February 1, 2018 through the present.

48. All documents regarding the approval of travel for any member of the SLT from February 1, 2018 through the present.

49. All policies regarding approval for, or reimbursement of, travel and travel expenses in effect from February 1, 2018 through the present.

50. All documents regarding payments made by JEA relating to the October 2018 Innovation Summit.

51. All agreements to which JEA was a party regarding the October 2018 Innovation Summit.

52. All presentations, reports, and memoranda prepared in relation to the October 2018 Innovation Summit.

53. All documents discussing the potential privatization of JEA from January 1, 2015 through the present.

54. All documents showing estimates of the value of JEA in the event of privatization from January 1, 2015 through the present.

55. All invoices from Pillsbury Winthrop Shaw Pittman LLP, Milam Howard Nicandri Gillam & Renner, P.A., and Foley & Lardner, LLP.

56. All communications with Pillsbury Winthrop Shaw Pittman LLP, Milam Howard Nicandri Gillam & Renner, P.A., or Foley & Lardner, LLP.

57. All agreements with Morgan Stanley.

58. All documents sent to or received from Morgan Stanley regarding any of the Inquiry Matters.

59. All agreements with JP Morgan.

60. All documents sent to or received from JP Morgan regarding any of the Inquiry Matters.

61. All communications between JEA and Morgan Stanley or JP Morgan.

62. Calendar entries regarding all meetings of the SLT or the Executive Team from February 27, 2018 through the present.

63. All documents regarding approval for, and payment of, expenses related to the SLT meeting on May 31, 2018 at White Oak Plantation.

64. All documents regarding approval for, and payment of, expenses related to the SLT meetings on April 4, 2019, June 11, 2019, August 19, 2019, and August 20, 2019 at Ponte Vedra Inn & Club.

65. All documents regarding approval for, and payment of, expenses related to the SLT meeting on July 10 - 11, 2019 at Club Continental.

66. All communications regarding the meetings at White Oak Plantation, Ponte Vedra Inn & Club, and Club Continental as described in paragraphs 63-65 above.

67. All documents provided to attendees or presented at the meeting on July 10 - 11, 2019 at Club Continental.

68. All communications between JEA and the Dalton Agency.

69. All documents provided to attendees or presented at the meetings described in paragraphs 63 — 65 above.

70. All documents identifying the attendees at the meetings described in paragraphs 63 - 65.

71. All communications to or from Mayor Lenny Curry, Brian Hughes, and Tim Baker, all ITN negotiation team members, and Sam Mousa.

72. All communications with Herschel Vinyard prior to his employment by JEA in April 2019.

73. All documents or communications regarding Deno Hicks, Southern Group, or Southern Strategy Group, including correspondence, contracts, invoices, calendar appointments, or ESI.

74. All documents regarding the procurement or attempted procurement of any contract between JEA and Deno Hicks, Southern Group, or Southern Strategy Group.

75. All memoranda and communications regarding the drafting of the Ten Year Site Plan filed with the PSC in March 2019.

76. All agreements regarding the preparation of the Ten Year Site Plan filed with the PSC in April 2019.

77. All communications with, or presentations to, rating agencies from January 1, 2018 through the present.

78. All drafts of the Integrated Resource Plan ("IRP") for JEA which was being drafted beginning in 2018.

79. All communications regarding the decision not to complete the IRP in 2019.

80. All communications between JEA and the Jax Chamber.

81. Images of all electronic devices, issued by JEA, to any SLT member.

82. All text messages or other electronic communications regarding the ITN or the PUP from Aaron Zahn, Ryan Wannemacher, Melissa Dykes, Herschel Vinyard, and Jon Kendrick.

83. All text messages or other electronic communications from the SLT regarding any of the Inquiry Matters.

84. All documents related to the selection of the new JEA headquarters.

### **INTERROGATORIES TO JEA**

Pursuant to the Charge of the Special Investigatory Committee on JEA Matters ("Committee") issued by the Jacksonville City Council President on February 4, 2020, the Committee met on February 10, 2020 and by resolution issued these Interrogatories to JEA. It is requested that JEA provide complete and accurate responses to the following questions through the Office of General Counsel as soon as reasonably possible.

### **Definitions**

"Inquiry Matters" means the Total Market Compensation Strategy, privatization or recapitalization of JEA, ITN, and PUP.

"ITN" means the Invitation to Negotiate #127-19 issued by JEA to evaluate proposals on strategic alternatives.

"PUP" means the Long-term Incentive Plan known as the Performance Unit Plan presented to, and approved by, the JEA Board on July 23, 2019.

"SLT" refers to JEA's past and present Senior Leadership Team.

### Timeframe

December 1, 2017 through the present unless otherwise specified.

### **Interrogatories**

1. Identify all purchases, contracts, or payments for any goods or services of \$10 Million or more.

2. Identify all outside attorneys and law firms engaged on behalf of JEA with respect to any of the Inquiry Matters.

3. Identify all vendors, consultants, or public relation firms hired by such attorneys and law firms on behalf of JEA.

4. Identify all other vendors, consultants, or public relation firms working with, or on behalf of, JEA with respect to any of the Inquiry Matters.

5. Provide a list of all JEA owned electronic devices issued to Aaron Zahn or any other member of the SLT.

6. Provide a list of all recipients of JEA purchased cellular telephones, together with each cellular telephone's manufacturer and model (e.g., Apple iPhone 7), phone number, and network provider (E.g., AT&T).

7. Provide a list of all electronic devices (regardless of whether owned by JEA) used by any SLT member to send or receive JEA e-mails, access JEA documents, or otherwise communicate with anyone regarding JEA matters.

8. Identify all code names, nicknames, project names, or other shorthand abbreviations for any of the Inquiry Matters (e.g., Project Scampi).

Subpoena No. 2019R02865019

AO110 (Rev. 04/07) Subpoena to Testify Before Grand Jury

### UNITED STATES DISTRICT COURT

### MIDDLE

DISTRICT OF

FLORIDA

TO:

Jacksonville Electric Authority Attn: Custodian of Records 21 W. Church Street Jacksonville, FL 32202

### SUBPOENA TO TESTIFY BEFORE GRAND JURY

YOU ARE HEREBY COMMANDED to appear and testify before the Grand Jury of the United States District Court at the place, date, and time specified below.

PLACE United States District Court	COURTROOM 8th Floor	
300 North Hogan Street, Suite 9-150	DATE AND TIME	
Jacksonville, Florida 32202-4271	05/20/20, 9:30 a.m.	

YOU ARE ALSO COMMANDED to bring with you the following document(s) or object(s):\*

### SEE ATTACHMENT. PLEASE PROVIDE IN ELECTRONIC FORMAT.

If you have any questions regarding this subpoena, please contact Special Agent Robert Blythe, Federal Bureau of Investigation, at 904-248-7464.

In lieu of personal appearance before the Grand Jury, records and/or electronic media may be returned, along with a completed and executed Declaration of Authentication of Business Records (form enclosed), to Special Agent Robert Blythe, Federal Bureau of Investigation, 6061 Gate Parkway N., Jacksonville, FL 32256.

### □ Please see additional information on reverse.

This subpoena shall remain in effect until you are granted leave to depart by the court or by an officer acting on behalf of the court.

CLERK		DATE
ELIZABETH WARREN		04/21/20
(By) Deputy Clerk		
This subpoena is issued on application of the United States of America Maria Chapa Lopez United States Attorney	NAME, ADDRESS AND P A. Tysen Duva 300 N. Hogan Street, Room Jacksonville, Florida 32202 Phone: 904-301-6300	

\* If not applicable, enter "none".



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"Fees and mileage need not be tendered to the witness upon service of a subpoena issued on behalf of the United States or an officer or agency thereof (Rule 45(b), Federal Rules of Civil Procedure; Rule 17(d), Federal Rules of Criminal Procedure) or on behalf of certain indigent parties and criminal defendants who are unable to pay such costs (28 USC 1825, Rule 17(b) Federal Rules of Criminal Procedure)".

Jacksonville Electric Authority Custodian of Records 21 W. Church Street Jacksonville, FL 32202-3155

### YOU ARE COMMANDED to bring with you the following document(s) or object(s):

Any and all documents and records (as defined below), including electronic (in native format) and paper files, during the time frame of January 1, 2018 to the present (unless there is an otherwise indicated timeframe):

### A. The Invitation to Negotiate (ITN) and the Long Term Incentive (LTI) Performance Unit Plan (PUP)

- 1. All documents and records in any manner pertaining to the Long Term Incentive (LTI) Performance Unit Plan (PUP).
- 2. All email communications involving Aaron Zahn, Ryan Wannemacher, Melissa Dykes, Herschel Vinyard, and any member of the JEA Executive Team and/or Senior Leadership Team (SLT) regarding the LTI PUP.
- 3. All documents and records in any manner pertaining to the Invitation to Negotiate (ITN), transition to a COOP, or issuance of an Initial Public Offering (IPO).
- 4. All email communications involving Aaron Zahn, Ryan Wannemacher, Melissa Dykes, Herschel Vinyard, and any member of the JEA Executive Team and/or Senior Leadership Team (SLT) regarding the ITN, transition to a COOP, or issuance of an IPO.
- 5.
- a. All documents and records in any manner pertaining to the May 20, 2019 memorandum from the Nixon Peabody law firm titled "JEA Memo Regarding Incentive Programs" emailed that same day from an attorney at Nixon Peabody to Ryan Wannemacher and Herschel Vinyard. This includes, but is not limited to, all email communications, text messages, and memoranda involving Aaron Zahn, any member of the JEA Executive Team and/or Senior Leadership Team (SLT), prior and subsequent to the issuance of the referenced May 20, 2019 Nixon Peabody memorandum in any manner pertaining to that memorandum.

- b. All documents and records in any manner pertaining to any other memorandum from the Nixon Peabody law firm in any manner pertaining to any JEA compensation plan. This includes, but is not limited to, all email communications, text messages, and memoranda involving Aaron Zahn, any member of the JEA Executive Team and/or Senior Leadership Team (SLT).
- 6. All documents and records in any manner pertaining to communications with the firm Willis Towers Watson regarding the LTI PUP.
- 7. The request in item 6 includes, but is not limited to, all documents and records in any manner pertaining to communications (and the communications themselves) involving David Wathen (Willis Towers Watson), any other employee of Willis Towers Watson, Aaron Zahn, Pat Maillis (JEA), Scott Strackbine (JEA), Ryan Wannemacher, Melissa Dykes, Herschel Vinyard, and any member of the JEA Executive Team and/or SLT Members.
- 8. All documents and records (and all iterations thereof) pertaining to the Willis Towers Watson power point slide presentation presented to the JEA Compensation Committee during the June 18, 2019 Compensation Committee Meeting, and the JEA Board during the June 25, 2019 and July 23, 2019 JEA Board Meetings.
- 9. The request in item 8 includes the April 25, 2019 version of the Willis Towers Watson power point slide presentation that Pat Maillis emailed to Aaron Zahn that same day (at Zahn's request), including all metadata for the power point presentation and any document pertaining to the alteration of the power point slides.
- 10. All documents and records showing when the JEA Board package/materials were provided to the JEA Board Members and/or Members of the Compensation Committee, in connection with any Compensation Committee meeting in July 2019 and/or the July 23, 2019 JEA Board meeting. This includes all documents and records illustrating when Aaron Zahn met with each individual Compensation Committee Member and/or JEA Board Member in advance of the July 23, 2019 JEA Board meeting.
- 11. All documents and records in any manner pertaining to the work that McKinsey & Company performed regarding all of JEA's strategic alternatives, including the status quo, traditional utility response, and all aspects of the non-traditional utility response.

- 12. All documents and records in any manner pertaining to the work that the Black & Veatch firm performed regarding all of JEA's strategic alternatives, including the status quo, traditional utility response, and all aspects of the non-traditional utility response.
- 13. All documents and records in any manner pertaining to the work that the Deloitte firm performed regarding all of JEA's strategic alternatives, including the status quo, traditional utility response, and all aspects of the non-traditional utility response.
- 14. All documents and records pertaining to communications of any and all JEA Executive Team and/or SLT Members with attorney Kevin Hyde and any other lawyer at the Foley & Lardner law firm regarding the LTI PUP.
- 15. All documents and records pertaining to communications of any and all JEA Executive Team and/or SLT Members with Jessica Lutrin and any other lawyer at the Pillsbury Winthrop Shaw Pittman law firm regarding the LTI PUP.
- 16. All documents and records pertaining to communications of any and all JEA Executive Team and/or SLT Members with any other lawyer, law firm, or government agency (federal, state, or local) regarding the LTI PUP.
- 17. All documents and records pertaining to communications of any and all JEA Executive Team and/or SLT Members with Michael Scheetz or any other employee at Mass Mutual regarding the administration of the LTI PUP.
- 18. All documents and records pertaining to communications of any and all JEA Executive Team and/or SLT Members with Kyle Billy and any other member of the Council Auditor's Office in connection with the Council Auditor's Office November 18, 2019 Report regarding the LTI PUP.
- 19. All documents and records pertaining to communications of Office of General Counsel (OGC) attorney Lynne Rhode (assigned to JEA) with any and all JEA Executive Team and/or SLT Members and/or other OGC attorneys regarding the ITN, COOP, IPO, and/or LTI PUP.
- 20. All documents and records, including all preliminary and final proposals (and the date and time each were received by JEA), submitted by the following entities pursuant to the ITN, whether for both electric and water, electric only, or water only:

- a. NextEra (including Florida Power & Light FP&L);
- b. Duke Energy;
- c. Macquarie;
- d. ARGO Energy Services;
- e. JEA Public Power Partners (PPP);
- f. Emera Electric;
- g. American Water;
- h. IFM Renewable Energy; and
- i. Any other entity that submitted an ITN related proposal.
- 21. The documents and records requested in item 20 include, but are not limited to, an accounting of the expected revenue to the City of Jacksonville (COJ) in any potential recapitalization of JEA as a result of the ITN.
- 22. All documents and records in any manner pertaining to all lobbying firms and lobbyists (paid and unpaid) in any manner associated with the ITN process.
- 23. All documents and records in any manner pertaining to any communications with any lobbyist in any manner connected with NextEra (including FP&L), or previously connected with NextEra, prior to and/or during the ITN process.
- 24. All documents and records submitted to (and documents and records received from) JP Morgan Chase in any manner connected with the ITN, COOP, or IPO process.
- 25. All documents and records submitted to (and documents and records received from) Morgan Stanley in any manner connected with the ITN, COOP, or IPO process.
- 26. All documents and records submitted to (and documents and records received from) any other investment firm or financial institution in any manner connected with the ITN, COOP, or IPO process.
- 27. All documents and records regarding JEA submissions to any and all bond rating agencies not included on the Electronic Municipal Market Access (known as EMMA) website for rating purposes in calendar years 2015, 2016, 2017, 2018, and 2019. This also includes any and all questions or inquiries posed by the rating agencies to the JEA CEO and CFO, and any responses thereto.

28. All documents and records pertaining to the use of the App Confide by Aaron Zahn, any lobbyist, and/or any member of Mayor Lenny Curry's administration in connection with the ITN and LTI PUP.

## B. The Jax Infrastructure Innovation Summit of 2018 and Innovation Alliance of Florida, Inc.

- 1. All documents and records submitted to JEA to obtain funding for the Jax Infrastructure Innovation Summit 2018 (Innovation Summit), including but not limited to, bid proposals, consulting contracts, sales invoices, service agreements, and other business records relating to transactions between Innovation Alliance of Florida, Inc. (Innovation Alliance of Florida) and JEA.
- 2. Copies of checks, ACH payments, wire transfers, or other payment documents for payments to Innovation Alliance of Florida.
- 3. Copies of checks, ACH payments, wire transfers, or other payment documents for payments to Southern Strategies Group, Southern Group, and/or Deno Hicks, and any return of funds from those entities and that individual to JEA.
- 4. Copies of checks, ACH payments, wire transfers, or other payment documents for any other payments disbursed in support of the Innovation Summit.
- 5. All other documents and records generated in support of and/or associated with the Innovation Summit and/or Innovation Alliance of Florida.
- 6. All documents and records showing a list of all JEA employees, Executive Team and/or SLT Members, and/or Members of the Board of Directors who attended the Innovation Summit.

### C. Selection of CEO Aaron Zahn during the November 27, 2018 JEA Board Meeting

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- 1. All documents and records, including but not limited to, all Board Member scoring sheets for candidates Aaron Zahn, Cris Eugstar, and Pamela Hill.
- 2. All documents and records received by JEA or the JEA Board regarding the qualifications of Aaron Zahn, Cris Eugstar, and Pamela Hill to be named as CEO of JEA.

3. All documents and records reflecting any and all contact between any member of the Mayor's Office and any JEA Executive Team and/or Senior Leadership Team (SLT) Member, and/or any JEA Board Member, regarding the CEO selection.

### D. JEA Process as to an Initial Public Offering (IPO)

- 1. All documents and records, including but not limited to, engagement letters or contracts between JEA and Morgan Stanley, JP Morgan Chase, and any other investment firm or financial institution in preparation for and in furtherance of an IPO.
- 2. All documents and records in any manner pertaining to communications with the JEA Board regarding the pursuit of an IPO.
- 3. All documents and records provided to (or received from) potential indexes or exchanges pertaining to JEA becoming a publicly traded entity pursuant to an IPO.
- 4. All documents and records reflecting invoices received from any consultant, lobbyist, investment firm, or financial institution in furtherance of pursuing an IPO.
- 5. All documents and records reflecting JEA's expenses and costs incurred in furtherance of pursuing an IPO.
- 6. All documents and records pertaining to communications with the Securities and Exchange Commission (SEC) regarding JEA filings with the SEC (and any such filings) in preparation for JEA conducting an IPO.
- 7. All documents and records in any manner pertaining to prospectus drafts (and the prospectus drafts themselves) prepared by or on behalf of JEA in preparation for a possible IPO, and any PowerPoint or other summaries of the prospectus or JEA's plan for becoming a publicly traded company.
- 8. All SEC Form S-1 drafts/registration statements and all EDGAR filings with the SEC.
- 9. All documents and records pertaining to draft financial statements submitted by JEA in furtherance of an IPO.
- 10. All documents and records illustrating and any all potential investors in the IPO for JEA.

- 11. All documents and records from JEA's pricing committee or any investment firm or financial institution's work on JEA's behalf to develop a stock price for JEA's IPO.
- 12. All documents and records from any investment firm or financial institution to assist JEA in complying with the SEC's regulations(S-K and S-X) surrounding becoming a publicly traded company.
- 13. All documentation and records received from JEA's consultants and financial statement auditors in furtherance of JEA pursuing an IPO including compliance with Sarbanes Oxley.

"Documents and records" includes, but is not limited to, correspondence (whether internal or external), memoranda, reports, handwritten notes, e-mails and e-mail attachments, phone records, call logs, text messages, calendars, proposals, minutes of meetings, presentations, letters, drafts, contracts, agreements, financial records, payment records, negotiable instruments, check stubs, canceled checks, wire transfers, credit card statements, receipts, invoices, bank statements, travel records, and photographs. The documents and records (including email communications) must be produced in native format when possible.

If a document demanded by this subpoena is withheld under a claim of privilege, or is otherwise withheld, provide the following information regarding the record: (1) its date; (2) the name and title of its author(s); (3) the name and title of each person to whom it was addressed, distributed and disclosed; (4) the number of pages; (5) an identification of any attachments or appendices; (6) a description of its subject matter; (7) its present location and the name of its present custodian; (8) the paragraph of this subpoena to which it is responsive; and (9) the nature of the claimed privilege or other reason the document is withheld.

### \*\*\*

In lieu of personal appearance before the Grand Jury, documents may be returned, along with a completed and executed Declaration of Authentication of Business Records (form enclosed), to the federal agents listed below. Any questions can also be directed to the below listed Federal Agent(s).

Special Agent Robert W. Blythe Federal Bureau of Investigation 6061 Gate Parkway Jacksonville, Florida 32256 Telephone: 904-248-7464 Special Agent Angela K. Hill Federal Bureau of Investigation 6061 Gate Parkway Jacksonville, Florida 32256 Telephone: 904-248-7038 Main Office 400 North Tampa Street, Suite 3200 Tampa, Florida 33602 813/274-6000 813/274-6200 (Fax)

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2110 First Street, Suite 3-137 Fort Myers, Florida 33901 239/461-2200 239/461-2219 (Fax)

Reply to: Jacksonville, Florida



U.S. Department of Justice United States Attorney Middle District of Florida 300 North Hogan Street, Suite 700 Jacksonville, Florida 32202-4270 904/301-6300 904/301-6310 (Fax)

400 West Washington Street, Suite 3100 Orlando, Florida 32801 407/648-7500 407/648-7643 (Fax)

April 21, 2020

### Custodian of Records

### Re: Certificate of Authentication of Business Records

### Dear Sir/Madam:

We write to ask your assistance regarding records you are providing to the government pursuant to Subpoena No. 2019R02865019 Under the Federal Rules of Evidence, a business record of regularly conducted activity can be self authenticated without the need for a foundation witness if accompanied by a written declaration of the records custodian or other qualified person that the record: (1) was made at or near the time of the occurrence of the matters set forth in the record by a person with knowledge of those matters or from information transmitted by a person with knowledge of those matters; (2) was kept in the course of the regularly conducted activity; and (3) was made by the regularly conducted activity as a regular practice.

Accordingly, in order that you or a representative from your company will not have to appear to authenticate the records produced, we ask that you complete a *Declaration of Authentication of Business Records* in substantially the same form as the document attached hereto. Pursuant to the Federal Rules of Evidence, we must provide the declaration to opposing counsel in advance of relying upon it. We, therefore, request that you provide the declaration contemporaneously with the record production.

Thank you for your cooperation. Please call us if you would like to discuss this matter.

Attachment

### DECLARATION OF AUTHENTICATION OF BUSINESS RECORDS

l,	_, am the custodian of records or am otherwise
(name) qualified to authenticate the records of _	
· · · · · · · · · · · · · · · · · · ·	(company or business)
I have provided the following records to	the United States pursuant to Subpoena No.
2019R02865019	
List of records provided:	
certify that the above records are busine I am a custodian or am otherwise qualifier certify that the records: (1) were made a set forth in the records by a person with	b) and 902(11), as amended December 1, 2000, I ass records of regularly conducted activity and that and as to the authentication of these records. I also at or near the time of the occurrence of the matters of knowledge of those matters or from information

transmitted by a person with knowledge of those matters; (2) were kept in the course of a regularly conducted activity; and (3) were made by the regularly conducted activity as a regular practice. I make these claims under penalty of perjury.

The address and phone number where I can be reached are:

Name and Signature

Sul withown .

Date

### Granat, Sean

From:	Owens, Katura E Mgr Technology Project Mgmt <owenke@jea.com></owenke@jea.com>
Sent:	Wednesday, November 20, 2019 9:30 AM
То:	Mack, Robert E Dir Organizational Effectiveness & Payroll
Subject:	RE: Validation table and tax id.xlsx Cost Numbers

Rob,

I think maybe another discussion with Russell might be warranted. I can put us together with Laura if you'd like but I really think there needs to some level setting. Maybe she needs to hear from Ryan the message Jon & Shawn gave to us.

Let me know how you'd like to proceed.

K. E. Owens ERP Technology Program Manager Direct: (904) 665-4215

From: Gutteridge Años, Laura A. - Mgr Financial Accounting & Reporting
Sent: Wednesday, November 20, 2019 9:10 AM
To: Mack, Robert E. - Dir Organizational Effectiveness & Payroll <MackRE@jea.com>
Cc: Caffey, Russell J. (Robert Half) <caffrj@jea.com>; Johnson, Akiesha D. - Manager, Project Accounting <j</li>
ohna@jea.com>; Owens, Katura E. - Mgr Technology Project Mgmt <owenke@jea.com>; Van Den Heuvel, Sharon - Dir
ERP Systems <VandS@jea.com>; Tarpley, Gwendolyn - Mgr Payroll Services <tarpg@jea.com>
Subject: RE: Validation table and tax id.xlsx Cost Numbers

Thanks Rob. I would like to understand why we are moving forward now that the PUP is being terminated. Can we have a meeting to discuss the business rationale behind this change?

Laura Gutteridge Años, CPA Manager, Financial Accounting & Reporting Direct: (904) 665-8295 Fax: (904) 665-8334

From: Mack, Robert E. - Dir Organizational Effectiveness & Payroll <<u>MackRE@jea.com</u>>
Sent: Wednesday, November 20, 2019 7:40 AM
To: Gutteridge Años, Laura A. - Mgr Financial Accounting & Reporting <<u>guttla@jea.com</u>>
Cc: Caffey, Russell J. (Robert Half) <<u>caffrj@jea.com</u>>; Johnson, Akiesha D. - Manager, Project Accounting
<<u>johna@jea.com</u>>; Owens, Katura E. - Mgr Technology Project Mgmt <<u>owenke@jea.com</u>>; Van Den Heuvel, Sharon - Dir
ERP Systems <<u>VandS@jea.com</u>>; Tarpley, Gwendolyn - Mgr Payroll Services <<u>tarpg@jea.com</u>>
Subject: RE: Validation table and tax id.xlsx Cost Numbers

Morning Laura,

I can confirm for you that the instruction from my leadership is to continue the transition of Appointed payroll to ADP and it remains unchanged in light of recent events. We are discussing some potential adjustments to the project



timelines and expectations, but the project is still targeting a phase one to begin payments to appointed employees and tax services for all employees beginning with the 1/10/20 pay cycle.

So as Gwen has requested, please provide the needed information as soon as you are able to help us continue to keep this effort on track.

Thanks for your support!

**Robb Mack** Director, Organizational Effectiveness and Payroll JEA Human Resources Direct: (904) 665-5778





From: Gutteridge Años, Laura A. - Mgr Financial Accounting & Reporting <<u>guttla@jea.com</u>>
Sent: Tuesday, November 19, 2019 5:16 PM
To: Tarpley, Gwendolyn - Mgr Payroll Services <<u>tarpg@jea.com</u>>; Owens, Katura E. - Mgr Technology Project Mgmt
<<u>owenke@jea.com</u>>
Cc: Mack, Robert E. - Dir Organizational Effectiveness & Payroll <<u>MackRE@jea.com</u>>; Caffey, Russell J. (Robert Half)
<<u>caffrj@jea.com</u>>; Johnson, Akiesha D. - Manager, Project Accounting <<u>johna@jea.com</u>>
Subject: RE: Validation table and tax id.xlsx Cost Numbers

Hi Gwen!

Before we put the time into filling this out, we need SLT confirmation that the transition to ADP is moving forward in light of the <u>confirmation</u> by Sherry Hall to the media that was published this afternoon indicating that the PUP is not going to be implemented. It was my understanding the move to ADP was happening due to the PUP implementation, which was also the reason for the accelerated deadline. When I spoke to Akiesha this afternoon, she indicated Katura was going to obtain this confirmation. Katura, please advise.

Thanks!

Laura Gutteridge Años, CPA Manager, Financial Accounting & Reporting Direct: (904) 665-8295 Fax: (904) 665-8334

From: Tarpley, Gwendolyn - Mgr Payroll Services <<u>tarpg@jea.com</u>>
Sent: Tuesday, November 19, 2019 4:59 PM
To: Gutteridge Años, Laura A. - Mgr Financial Accounting & Reporting <<u>guttla@jea.com</u>>; Johnson, Akiesha D. - Manager,
Project Accounting <<u>iohna@jea.com</u>>
Cc: Mack, Robert E. - Dir Organizational Effectiveness & Payroll <<u>MackRE@jea.com</u>>; Owens, Katura E. - Mgr Technology
Project Mgmt <<u>owenke@jea.com</u>>
Subject: Validation table and tax id.xlsx Cost Numbers
Importance: High

Hi Akiesha / Laura,

We have been asked to enter data into the attached spreadsheet for ADP. Please notice the tab entitled "Cost Numbers". Would it be possible for you to fill in the data on this tab by Thursday?

Also, the second screen show below lists various items that are circled. Can you please provide an explanation of what the entries represent and where they come from.

Thanks in advance..... Gwen

L How long is your Cost Number ipto a 50 character string. 2. Is your cost number made up o lo you need a separator?			
Company Name and/or Company Code	Cost Number Code	Cost Number Descripti	on
	Required	Required	
ABC	10000-xxx-001	Sample Cost Number Description	
·			
		, .	
			•
		· ·	

L	Cost Allocation Segments	Credit Amount	Debit Amount	Accrual Type	Fund	Cost Cente
2	021.00000.00000000.00.232030.0000.0000	71.35	0		21	
3	021.00000.00000000.00.241005.0000.0000	512.62	0		21	
1	021.00000.00000000.00.232089.0000.0000	0	512.62		21	
5	021.00000.00000000.00.241005.0000.0000	51.58	0		21	
6	021.00000.00000000.00.232089.0000.0000	0	51.58		21	
7	021.20414.00000000.00.500101.1110.0000	0	51.58		21	2041
3	021.00000.00000000.00.241005.0000.0000	51.58	0		21	
)	021.00000.00000000.00.232034.0000.0000	1.17	0		21	
0	021.00000.00000000.00.232089.0000.0000	. 0	1.17		21	
1	021.20414.00000000.00.500101.1104.SF20	0	550.78		21	2041
2	021.00000.00000000.00.232005.0000.SF20	550.78	0		21	
3	021.20414.00000000.00.500101.1111.0000	0	26.51		21	2041
					~	

Gwen Tarpley

Manager, Payroll Services Direct: (904-665-8244)

Cell : (904-258-1988)

### **Allison Abbott**

From:	Motsett, Brian (ES) <brian.motsett@adp.com></brian.motsett@adp.com>
Sent:	Thursday, October 17, 2019 8:09 AM
То:	Kendrick, Jonathan A VP & Chief Human Resources Officer
Subject:	FW: ADP to JEA Executive Sponsor Intro

[External Email - Exercise caution. DO NOT open attachments or click links from unknown senders or unexpected email.]

Jon,

Can we talk this morning? I can push any call before 10am with exception of my 8:30am - 9am (its for JEA).

From: Eads, Shawn W. - VP & Chief Information Officer [mailto:eadssw@jea.com]
Sent: Thursday, October 17, 2019 8:05 AM
To: Motsett, Brian (ES) <Brian.Motsett@ADP.com>
Cc: Kendrick, Jonathan A. - VP & Chief Human Resources Officer <kendja@jea.com>; Dejesus, Guarionex (ES)
<Guarionex.Dejesus@adp.com>; Prater, Cecilia (ES) <Cecilia.Prater@adp.com>; Bullock, Robin (ES)
<Robin.Bullock@ADP.com>

Subject: RE: ADP to JEA Executive Sponsor Intro

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We will talk at 10:30. My expectation is Jon and I will get more out of this meeting than we have the last handful. Our teams heard again this week on a call that this is a very busy time for ADP... It is for JEA too and if ADP cannot deliver, then let's make that call now. It doesn't instill a lot of confidence in a very tough aggressive project when our partner is setting up the discussions saying they are very busy. I am being direct because Jon and I are on the hook with our President and CEO. They have asked us daily about this and our confidence in success. I look forward to the discussion.

Shawn

From: Motsett, Brian (ES) <<u>Brian.Motsett@ADP.com</u>>
Sent: Thursday, October 17, 2019 7:51 AM
To: Eads, Shawn W. - VP & Chief Information Officer <<u>eadssw@jea.com</u>>
Cc: Kendrick, Jonathan A. - VP & Chief Human Resources Officer <<u>kendja@jea.com</u>>; Dejesus, Guarionex (ES)
<<u>Guarionex.Dejesus@adp.com</u>>; Prater, Cecilia (ES) <<u>Cecilia.Prater@adp.com</u>>; Bullock, Robin (ES)
<<u>Robin.Bullock@ADP.com</u>>
Subject: Re: ADP to JEA Executive Sponsor Intro

EXHIBIT BEFTER-DOB CONSTANT [External Email - Exercise caution. DO NOT open attachments or click links from unknown senders or unexpected email.]

Shawn,

Can you talk now?

Expectation set for this calls was always high level intro purposes and to get next steps into immediate action. We just met with Guari and a few key members last night so if we can discuss what you mean by detail rich that may help ensure we all have fair expectations

### Meeting Agenda:

- Introductions
- Roles & Responsibilities
- Project Scope
- Status Updates
- Schedule Project Kickoff Meeting

Best,

Brian 904-710-8488

Sent from my iPhone - please excuse brevity, errors and omissions

On Oct 17, 2019, at 7:21 AM, Eads, Shawn W. - VP & Chief Information Officer <<u>eadssw@jea.com</u>> wrote:

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OK, but I want this call to be action based and detail rich.

Shawn

From: Motsett, Brian (ES) < Brian.Motsett@ADP.com>

Sent: Thursday, October 17, 2019 7:15 AM

To: Eads, Shawn W. - VP & Chief Information Officer <<u>eadssw@jea.com</u>>

**Cc:** Kendrick, Jonathan A. - VP & Chief Human Resources Officer <<u>kendja@jea.com</u>>; Dejesus, Guarionex (ES) <<u>Guarionex.Dejesus@adp.com</u>>; Prater, Cecilia (ES) <<u>Cecilia.Prater@adp.com</u>>; Bullock, Robin (ES) <Robin.Bullock@ADP.com>

Subject: Re: ADP to JEA Executive Sponsor Intro

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For the call at 10:30 it should be primary executive sponsor(s). The wider call with both teams will follow.

### Brian 904-710-8488

Sent from my iPhone - please excuse brevity, errors and omissions

On Oct 17, 2019, at 6:20 AM, Eads, Shawn W. - VP & Chief Information Officer <<u>eadssw@jea.com</u>> wrote:

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Should Jon and my leads join this call too? Robb and Sharon? They will be driving this aggressive project, so should they be on even these executive calls?

### Shawn

From: Motsett, Brian (ES) <<u>Brian.Motsett@ADP.com</u>>
Sent: Wednesday, October 16, 2019 5:42 PM
To: Kendrick, Jonathan A. - VP & Chief Human Resources Officer <<u>kendja@jea.com</u>>;
Dejesus, Guarionex (ES) <<u>Guarionex.Dejesus@adp.com</u>>; Eads, Shawn W. - VP & Chief Information Officer <<u>eadssw@jea.com</u>>
Cc: Prater, Cecilia (ES) <<u>Cecilia.Prater@adp.com</u>>; Bullock, Robin (ES)
<<u>Robin.Bullock@ADP.com</u>>
Subject: ADP to JEA Executive Sponsor Intro

[External Email - Exercise caution. DO NOT open attachments or click links from unknown senders or unexpected email.]

Jon and Shawn,

Good evening!

Quick update... We just had our turnover call with some key members of your ADP implementation team.

We'll have some more details by the morning for tomorrows call agenda but this will be mostly high level for introductory purposes and may only take 15 - 20 minutes.

On the call tomorrow will be Guari (pronounced Guadi) who is your ADP PM, myself and Cecilia. Normally, Robin Bullock (who is your RM - Relationship Manager) would join as well but due to conflicting schedules and in the interest to keeping this moving swiftly we wanted to keep the first available time on your end.

i

Looking forward to speaking tomorrow.

Best,

Brian

### ADP to JEA Executive Sponsor Intro

Scheduled: Thursday, Oct 17, 2019 from 10:30 AM to 11:00 AM Location: 1-800-377-0237,,,4707006# Invitees: Prater, Cecilia (ES), Bullock, Robin (ES), 'Kendrick, Jonathan A. - VP & Chief Human Resources Officer', Dejesus, Guarionex (ES), Lau, Alexandra (ES), Eads, Shawn W. - VP & Chief Information Officer

Brian 904-710-8488

Sent from my iPhone - please excuse brevity, errors and omissions

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