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IN THE CIRCUIT COURT OF THE
FIFTH JUDICIAL CIRCUIT IN
AND FOR LAKE COUNTY, FLORIDA

MICHAEL FEWLESS,
Plaintiff,

vs.

CASE NO.: 2020-CA-1268

CITY OF MOUNT DORA,
Defendant.

_____ /

DEPOSITION OF: MARILYN ACIEGO
AT THE INSTANCE OF: Plaintiff
DATE: February 23, 2021
TIME: Commenced: 3:00 p.m.
Concluded: 4:07 p.m.
LOCATION: VIDEOCONFERENCE
REPORTED BY: ANDREA KOMARIDIS WRAY
Court Reporter and
Notary Public in and for the
State of Florida at Large

PREMIER REPORTING
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TALLAHASSEE, FLORIDA
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1 APPEARANCES :

2 REPRESENTING THE PLAINTIFF :

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4 Andrews Law Firm
5 822 North Monroe Street
6 Tallahassee, FL 32303

7 REPRESENTING THE DEFENDANT :

8 MICHAEL H. BOWLING
9 Bell and Roper, P.A.
10 2707 East Jefferson Street
11 Orlando, FL 32803

12 ALSO PRESENT :

13 MICHAEL FEWLESS
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NO.	DESCRIPTION	MARKED
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No exhibits were marked for identification.

*Huh-uh is a negative response
*Uh-huh is a positive response

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STIPULATIONS

The attorneys participating in this deposition acknowledge that I, the court reporter, am not present with the witness and that I will be reporting the proceedings and administering the oath remotely. This arrangement is pursuant to the Florida Supreme Court Administrative Order AOSC-20-16. The parties and their counsel consent to this arrangement and waive any objections to this manner of reporting.

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D E P O S I T I O N

Whereupon,

MARILYN ACIEGO

was called as a witness, having been first duly sworn to speak the truth, the whole truth, and nothing but the truth, was examined and testified as follows:

EXAMINATION

BY MR. ANDREWS:

Q Good afternoon, Ms. Aciego. Before we get started, I -- I just want to make sure -- someone in my office said that they spoke with you to let you know that the depo was running late and that you have a hard 4:30 stop?

A I actually got somebody to pick my son up, so I'm okay.

Q Oh, okay. If there's anything that you need or you need to step out, just let us know. Okay?

A Okay.

Q All right. I'll try to be -- same thing King Henry told his wives, I'll try to be quick.

Ms. Aciego, where do you currently work?

A Lake Legal News.

Q Lake Legal News.

Is -- now, do you own Lake Legal News?

A I'm a 50/50 partner.

1 **Q Okay. How long has Lake Legal News been in**
2 **existence?**

3 A There's actually two parts to Lake Legal News.
4 The magazine started about ten years ago. I have no --
5 I'm not a partner in that. And the website started in
6 September of 2019, and I am a partner in the website.

7 **Q How many reporters does Lake Legal News have?**

8 A It's just me.

9 **Q And I say reporters, like reporter,**
10 **investigative journalist -- like, how do you typically**
11 **refer to yourself?**

12 A I usually -- I'm actually the editor-in-chief,
13 by title, but I call myself a reporter.

14 **Q Okay. All right. How long have you been**
15 **doing that?**

16 A For Lake Legal News, since September of '19,
17 but I've been in the media since I was about 22 years
18 old. And I'm 41, now.

19 **Q Okay. And during that time period, what was,**
20 **like, your beat or your main coverage for --**

21 A I've always had either the police beat or a
22 beat involving the law, like court cases and things like
23 that. Always something around the law.

24 **Q Okay. Was that, like, a personal interest**
25 **or was that what most people --**

1 A Yes, personal interest.

2 **Q Okay. All right. Let me see here. When did**
3 **you first start covering Mount Dora?**

4 A Since I worked for Lake Legal News or, like,
5 from the very beginning?

6 **Q Well, I guess ever.**

7 A 2002, 2003, I guess. I worked for a different
8 publication at the time.

9 **Q Okay. What publication was that?**

10 A The Daily Commercial in Leesburg.

11 **Q Okay. When you worked for the Daily**
12 **Commercial, did you ever have an interaction or**
13 **encounter with Rob Bell?**

14 A Yes, I did.

15 **Q Was that -- is that when you would have had**
16 **your first interaction with him, ever, or was there a**
17 **time that you had an interaction with him prior to**
18 **working for the Daily Commercial?**

19 A Prior to that, I delivered pizza, when I was
20 going to college. And I was dating a man, who is
21 actually my son's father now, and he lived in Mount
22 Dora. And that's when I first ran across Robert Bell.
23 I would have been 18 or 19. So, that would have been,
24 like -- probably about 1999.

25 **Q And what was the first -- can you explain the**

1 **circumstances of your first encounter with Rob Bell?**

2 A I can't remember the first encounter, but my
3 son's father's family has some issues and they -- just
4 to be completely honest, my son's father is in prison
5 and so are his two brothers. And they all grew up in
6 Mount Dora and they just sort of ran across Robert quite
7 a bit.

8 **Q Okay. And when was the first time you**
9 **remember ever interacting with him? If you do.**

10 A I can remember him stopping by -- my son's
11 father's family owns a house in Mount Dora. And that
12 was sort of a hangout way back when. And I remember him
13 stopping by there, making remarks as he drove by, but I
14 can't give you an exact date.

15 **Q Was there ever time where you met Rob Bell**
16 **where you were delivering pizzas or food?**

17 A I believe I ran across him a couple of times,
18 yes. I delivered in that ar- -- the -- the northeast
19 section of the Mount Dora is generally known as the
20 black community. My son's father is black. I delivered
21 pizza in that area a lot.

22 It wasn't rare for me to see him several times
23 a week -- not necessarily in interaction and speak to
24 him, but I would see him quite often. I think he was in
25 the drug unit back then.

1 **Q** Did you ever have -- well, how about this,
2 prior to working at Lake Legal News, did you ever
3 have -- have interactions with Rob Bell that you
4 considered him to have been unprofessional?

5 A Yes.

6 **Q** Can you give me some examples of that?

7 A One that definitely comes to mind, I had been
8 dating my son's father for a -- for a couple of months.
9 I don't remember exactly how long it had been. And I
10 was young then. I went out to bars and clubs and stuff
11 like that.

12 And I was coming home. It was really early in
13 the morning -- I think it was about 3:00 or 4:00 in the
14 morning -- and I stopped at a gas station, which is
15 actually no longer there now. And he came in and
16 immediately came up to me -- I was, like, back at the
17 back cooler, getting a soda.

18 And he immediately came up to me and made a
19 remark about who I was dating and I shouldn't be dating
20 that person, I should make better choices. And I made a
21 smart remark back and said, better choices like who.
22 And he said, like me. And I said, yeah, that's never
23 gonna happen. And then I kind of just exited the
24 situation.

25 **Q** And that was when --

1 A And --

2 Q -- he was a police officer?

3 A Yeah, I think he was a sergeant then.

4 Q Do you recall if he was in uniform when he did
5 that?

6 A I want to say -- he must have been in uniform.
7 I can't remember exactly, but he must have been in
8 uniform because he was, like, on the road then. So, I'm
9 pretty certain he was in uniform.

10 Q Okay. And from that date forward, did you
11 have more uncomfortable or unprofessional encounters
12 with Mr. Bell?

13 A I was pulled over numerous times in Mount
14 Dora, not always by him -- in fact, it usually wasn't
15 him, but I would later be told that I was pulled over at
16 his behest.

17 And there was one instance in particular where
18 I got pulled over for stopping past a -- the stop bar at
19 a stop sign. That was back toward the northeast
20 community. I got back out onto Donnelly Street, which
21 is a very common road. It's a very busy road. I didn't
22 get pulled over until I got onto Donnelly. The officer
23 who pulled me over asked me, if I had -- you know, did I
24 have anything illegal in the car or anything like that.
25 I told him no.

1 And Robert showed up on the scene and asked to
2 search the car. I let him search the car. I know I
3 didn't have to, but I -- I had nothing to hide. I let
4 him search the car.

5 That wasn't good enough. He had probably had
6 me pulled over for at least 45 minutes, and then they
7 called in their K-9 officer at the time, who was not
8 even at work. And they called him in. They ran the dog
9 around the vehicle several times, searched the vehicle
10 again.

11 I was probably stopped for more than two and a
12 half hours. I was on my lunch break and my boss came
13 looking for me.

14 MR. BOWLING: I -- listen, I -- I just -- I
15 know you're going to go on and on, but I need to
16 put a -- put an objection on the record. This is a
17 whistleblower case involving events in 2020. How
18 and what possible relevance this stuff could have
19 to this case is unknown.

20 And if we're going to spend the next hour
21 listening to -- to this -- we've got -- well, okay.
22 There's my objection. I think it's a waste of time
23 and it may be abusive.

24 Go ahead.

25 MR. ANDREWS: If you think that's abusive,

1 you're probably going to think my next question is
2 abusive.

3 But to address your objection, it's relevant
4 because it has to do with, for example, why she
5 might not want to give a complaint to Rob Bell
6 versus Mike Fewless. So, there's a basis for it.

7 BY MR. ANDREWS:

8 **Q Ms. Aciego, you said your son's father is**
9 **black; is that correct?**

10 A Yes.

11 **Q In any of your encounters with Rob Bell, did**
12 **you find him to be racist or disrespectful to African-**
13 **Americans?**

14 A Yes, many times. And while this is probably
15 hearsay, and I can't speak for the entire black
16 community in Mount Dora, he is not well-liked in that
17 community.

18 **Q Have you ever heard Rob Bell use a racial**
19 **epithet at the times he drove by your son's father's**
20 **house or any other time?**

21 MR. BOWLING: Objection.

22 A Not that I can recollect.

23 **Q Okay. That would be something you would**
24 **recall if he had said it, though, right?**

25 MR. BOWLING: Objection.

1 A Yes.

2 Q Okay. Would it be fair to say that you don't
3 trust Rob Bell?

4 A Yes, that's fair to say. I do not trust
5 Robert Bell.

6 Q Would it be fair to say that, in the time that
7 you began Lake Legal News, moving forward, that you
8 didn't trust Robert Bell?

9 A Yes, that's fair to say.

10 Q Okay. Now, did there come a time when you
11 learned that someone named Mike Fewless worked for the
12 City of Mount Dora?

13 A Correct.

14 Q Do you recall approximately when that was or
15 the circumstances that led to that?

16 A I'm pretty sure it was December 31st, by
17 referring back to the first article that I wrote when I
18 talked to him.

19 We had a number of vehicle break-ins, smash-
20 and-grabs, at hotels that stretched across several
21 cities, and one of the cities was Mount Dora. I called
22 the police department, identif- -- like, the main number
23 at the police department, identified myself as a
24 reporter. And I don't remember exact words I used, but
25 something to the effect of: I'm a reporter. I need

1 some information on a case. Who do I need to talk to.

2 And that's how I ended up speaking with Mike
3 Fewless.

4 **Q So, let me understand this. You called the**
5 **police department, as a member of the media, and asked**
6 **to speak with the spokesperson, correct?**

7 MR. BOWLING: Objection.

8 A I don't know if I used that word, but yes,
9 that was the gist of what I was saying.

10 **Q Okay. So, let me -- let me rephrase this.**
11 **When you called the police department, as a member of**
12 **the media, having questions regarding a police incident,**
13 **you were looking to speak with the spokesperson; is that**
14 **fair to say?**

15 A Correct, yes, because most agencies only allow
16 one or two people to speak with the media because
17 they're trained to speak with us and how to handle our
18 questions and things of that nature.

19 **Q And when you say agencies, you're talking**
20 **about the law enforcement agencies, right?**

21 A Correct. Almost every law enforcement agency
22 that I deal with has a designated public information
23 officer.

24 **Q And when you called the police department that**
25 **day or night, they forwarded you to Michael Fewless; is**

1 **that right?**

2 MR. BOWLING: Objection.

3 A Correct.

4 **Q Okay.**

5 THE COURT REPORTER: Real quick -- Ryan?

6 (Discussion off the record.)

7 BY MR. ANDREWS:

8 **Q And, to the best of your recollection, that's**
9 **the first time you had spoken with him?**

10 A Yeah, I'm almost positive that's the first
11 time I spoke to him.

12 **Q Okay. Moving forward, did there come a time**
13 **when you reached out to Mike Fewless, in 2020, to**
14 **complain about the way you were treated by Mount Dora**
15 **police officers at a Lowe's shooting?**

16 A Yes.

17 **Q Okay. And why did you reach out to Mike**
18 **Fewless?**

19 A Because I had spoken to him on the prior case
20 and, as far as I knew, that's who I was supposed to be
21 speaking to.

22 **Q And when you say, "As far as I knew, that's**
23 **who I was supposed to be speaking to," is that because,**
24 **when you called the police department, asked them for**
25 **comment before, you had been transferred to Mike**

1 **Fewless?**

2 A Correct. And when I spoke to him on the first
3 case, with the smash-and-grab burglaries, he gave me his
4 cell phone number. So, I immediately put that in my
5 phone and that's -- you know, when I had an issue in
6 Mount Dora, that's who I communicated with.

7 **Q Now, after that -- the Lowe's shooting, when**
8 **you reached out to Mike Fewless, you were contacting him**
9 **because of the way that officers treated you at the**
10 **scene; is that correct?**

11 A I actually contacted him on the scene that
12 night.

13 **Q Okay. And --**

14 A Because I had been out there quite a long
15 time, probably at least 45 minutes and I was being
16 ignored. And I called him and I think I woke him up
17 because it was probably about 11:00, 11:30 at night when
18 I called him.

19 **Q Do you -- when you called him, do you recall**
20 **what you told him?**

21 A I told him that I was on -- I think the first
22 thing I said was, you know, hey, Deputy Chief, it's
23 Marilyn Aciego. What's going on at Lowe's. And, like I
24 said, I think I woke him up. So, it took him a minute
25 to kind of figure out what I was talking about.

1 And then I -- I -- and I think he asked me
2 where I was. And I told him I was on the scene. And
3 I'm like, nobody will talk to me. I just need a little
4 bit. I don't -- you know, I know you're not going to
5 give me, like, the details of your investigation, but I
6 just need a little bit because people want to know why
7 the parking lot of Lowe's is crime-scene-taped off. I
8 mean, that's a very popular Lowe's.

9 **Q Would it be fair to say that you were calling**
10 **him to have someone at the scene acknowledge your**
11 **presence?**

12 A Yes, absolutely, which someone did, after I
13 called him.

14 **Q What happened next?**

15 A He told me that a captain would be coming over
16 to talk to me, and we hung up. And it was probably less
17 than two minutes later, Captain Hunter came over and
18 spoke to me and gave me the information I needed to
19 write a story.

20 **Q Now, do you recall when that story was**
21 **written?**

22 A If you give me just a second -- I need to
23 refer to my website.

24 **Q All right.**

25 A It looks like I published that story May 15th

1 of 2020.

2 Q Are you able to determine how many views that
3 story got?

4 A Yes. 12,300.

5 Q 12,300 views.

6 A Yes, sir.

7 MR. BOWLING: Huh.

8 MR. ANDREWS: Huh.

9 MR. BOWLING: There's no jury here.

10 MR. ANDREWS: That surprise- -- that even
11 surprised you, huh, Mike?

12 BY MR. ANDREWS:

13 Q So, Lake -- Lake Legal News -- it's not, like,
14 a small periodical, is it; it generates a lot of views?

15 A It can. I mean, I've had weeks that we're
16 over a hundred thousand unique views in one week. It
17 really depends on what's going on.

18 Q Sure.

19 A I mean, we can go days with nothing exciting
20 going on. So, of course, we don't have views, but like
21 I said, that's a very popular Lowe's at a very busy
22 intersection, and a lot of people wanted to know what
23 was going on.

24 And someone was killed -- I mean, that was --
25 that's still a pretty big deal in Lake County when

1 somebody gets killed.

2 Q After you published this article, did anybody
3 from City Hall -- and I -- when I say anybody from City
4 Hall, I mean not affiliated with the police department,
5 but affiliated with City Hall -- reach out to you and
6 say, hey, you can't -- you can't call the police
7 department for quotes; you need to call the PIO?

8 A No, that never happened.

9 Q Okay. The mayor -- neither the mayor, the
10 city manager, or the PIO called you and said, hey, all
11 media inquiries need to go through us.

12 A Nope.

13 Q Do you know, during this time period, the PIO
14 was on leave?

15 A Someone had told me, at some point -- and I
16 honestly can't remember who told me -- that she was out
17 on medical leave, but I really didn't even know she
18 existed until Mike Fewless got fired because I thought,
19 all those months I was talking to Mike, that was who I
20 was supposed to be talking to.

21 Q Prior to talking to Mike Fewless, when you
22 needed things from the police department, who would you
23 contact?

24 A No one -- at Lake Legal News, no one, because
25 I didn't have anything happen in Mount Dora from

1 September to December that I needed to talk to anybody.

2 Q Okay. So, it's not that, like, no one would
3 talk to you; it's just that you never had -- you don't
4 recall writing an article at that time?

5 A Correct. There was just not a reason to talk
6 to them before the smash-and-grabs in the vehicles.

7 Q Okay. All right. Give me one second.

8 Now, in that May 15th article, do you recall
9 you obtained statements from the -- from the police
10 department that night?

11 A Mike Fewless give me a statement on the phone,
12 and then Captain Hunter came over and talked to me
13 in-person and gave me another statement.

14 Q Yeah. And that was on May 15th.

15 A That's when we published the story, yes.

16 Q All right.

17 A It was late into the night. I believe it was
18 a Friday night when that happened. Let me check the
19 date real quick.

20 Q Okay.

21 A Yeah, May 15th was a Friday. Yes, so, it did
22 happen May 15th, and I was -- did get the story
23 published the same day that it happened.

24 Q Okay. Now, on December 31st, 2019, you wrote
25 an article about the crimes in Mount Dora; is that

1 **correct?**

2 A That was the smash-and-grabs that went across
3 three cities.

4 **Q Are you able to tell us how many views that**
5 **article got?**

6 A Let me see if I can find that.

7 Okay. There were actually two stories on that
8 incident. The first story was the -- when it first
9 happened -- that one got 2,000 views. And I published
10 that December 31st, 2019.

11 And then I did a follow-up because I had a
12 photo of the suspect. And when I did the follow-up,
13 that one got 4,800 views.

14 **Q Okay.**

15 A And I got that photo from Mike Fewless. I
16 credited Mount Dora Police Department with that photo.

17 **Q Okay. Like, the police department released**
18 **the photo of the suspect?**

19 A Corr- -- it was like a survei- -- it was like
20 a still from a surveillance photo from one of the
21 hotels.

22 **Q Okay. Now --**

23 A And I published that one -- that one was
24 published January 2nd. So, that was three days later.

25 **Q Now, on July 9th, you wrote an article that**

1 **quoted Coy Hunter; is that correct?**

2 A July -- do you remember -- can you give me a
3 little bit what the article was about?

4 Q Hold on. Let me see. I think it was about a
5 tr- -- traumatic injuries for male and female victims in
6 Mount Dora shooting?

7 A Okay. There it is. Yes, that one, I wrote
8 July 9th.

9 Q Did this one have a quote from anyone in the
10 police department?

11 A Let me double-check. Yes, Coy Hunter.

12 Q Okay. After this article was published, did
13 anyone ever tell you that you cannot obtain quotes from
14 Coy Hunter or other officers; you need to go through
15 City Hall?

16 A No.

17 Q How many views did this story get?

18 A 3,800.

19 Q Give me one moment. Sorry. One moment.

20 Prior to May of 2019 -- excuse me, prior to
21 May of 2020, did you ever call City Hall, the
22 administration of the City of Mount Dora, to seek
23 information --

24 A No, I did not --

25 Q -- related to -- related to --

1 A I'm sorry. I'm sorry. No, I did not.

2 **Q It -- would it be fair to say that the reason**
3 **you didn't is because you never had news stories that**
4 **you were writing about City Hall specifically?**

5 A I -- it's a very rare occasion to deal with
6 any city hall when you're dealing with law enforcement.
7 And because I had always dealt with Mike Fewless, if I
8 needed something, that's who I called.

9 **Q Now, we talked about you reaching out to Mike**
10 **Fewless on the night of the Lowe's murder. Did there**
11 **come a time where you reached out to him again**
12 **concerning a double shooting in the northeast**
13 **communities?**

14 A Yes. That was after the article that was on
15 July 9th, the one that we just spoke about when I got a
16 quote from Captain Hunter. And I was treated basically
17 the same way on that scene as I was at Lowe's.

18 I was -- when I go out to a scene, I have a
19 notebook. I have a pen. I have a press pass around my
20 neck. I usually have a camera around my neck. It's
21 pretty obvious that I'm the media. And I usually walk
22 right up to the crime-scene tape.

23 Several officers -- and I don't know who they
24 were. I couldn't name them -- looked me right in the
25 face and ignored me like I wasn't even standing there.

1 And then I did reach out to Mike Fewless a second time
2 and say, we're still going through this again; what can
3 we do about this.

4 Q Do you feel as though the officers at the
5 northeast community shooting were being unprofessional
6 or disrespectful?

7 Hello?

8 A Yes, because I think, at the very least, they
9 should have at least acknowledged the fact that I was
10 standing there and attempted to get me who I needed. If
11 they can't speak to me, get me someone who can, but I
12 didn't even get an opportunity to speak to anybody.
13 They wouldn't come close enough to me for me to speak.

14 Q So, after being on scene at the double
15 shooting in the northeast community, did you reach out
16 to Mr. Fewless and tell him that you wanted to complain
17 about the police department's conduct at that crime
18 scene?

19 A Yes.

20 Q Okay. And at that point you reached out to
21 Mr. Fewless, was a meeting set for you to voice these
22 complaints, then?

23 A Yes, it was.

24 Q And did that meeting occur on July 17th, 2020?

25 A That sounds like the correct date (examining

1 document).

2 Sorry. I have to use different search terms
3 to pull up different articles.

4 Q No problem.

5 A Yes, July 17th. I'm sorry. There it is.

6 Q Okay. And you went to meet Mr. Fewless on
7 July 17th; that's correct?

8 A Correct.

9 Q Okay. Now -- and, again, I want to be clear:
10 Was the purpose of this meeting to complain about the
11 conduct of the officers at the crime scene and ignoring
12 you?

13 A Yes.

14 Q Okay. Would it be fair to say that part of
15 the reason you wanted to meet with him was you wanted to
16 raise these complaints about the officers so you could
17 at least be acknowledged at the scene and whether you
18 had any questions or information, they could be taken
19 and, you know, handled as appropriate by the police
20 officers?

21 A Yes. I wanted to know what we could do to
22 better the relationship between Lake Legal News and the
23 Mount Dora Police Department.

24 Q And you say better that relationship, you mean
25 through going to him and telling him about the problems

1 **you experienced at the crime scene, correct?**

2 A Correct, because I'm the bridge betw- -- the
3 media is the bridge between the public and the police.

4 **Q Sure.**

5 A It's my job to find out what's going on to
6 inform the public. And if I'm being shut out on a
7 scene, I can't inform the public what's going on.

8 **Q But -- let me make sure I understand this**
9 **correctly. You didn't go to the police station on**
10 **July 17th, 2020, for an interview of Mike Fewless, did**
11 **you?**

12 A No, it was a conversation.

13 **Q You weren't there with your microphone in**
14 **hand, on the record, trying to write a story, were you,**
15 **about Mike Fewless?**

16 A No. In fact, I always have a notebook on me,
17 but I did not even have my notebook out while Mike and I
18 were speaking one-on-one because that -- it wasn't that
19 type of meeting.

20 **Q Okay. From Mike Fewless' lips to your ears,**
21 **did he give you any official statement on the record**
22 **that day while you were in his office about any crime**
23 **scene or investigation that was going on?**

24 A No, he did not.

25 **Q I said his lips to your ears, right; not your**

1 **lips to his ears? I got that right?**

2 A I know what you meant. I'm not sure if you
3 said it right, but I know what you meant.

4 Q **Okay. I mean -- I meant his lips to your**
5 **ears.**

6 **Okay. There came a point in time where you**
7 **interviewed the mayor -- or there came a point in time**
8 **where you learned that Mike Fewless was terminated from**
9 **the City of Mount Dora, correct?**

10 A Correct. I got an anonymous phone call.

11 Q **Man or woman or -- do you know?**

12 A A fe- -- a female, and I never even asked who
13 she was.

14 Q **That would make sense, in your line of**
15 **business.**

16 A Yeah, it's -- I get anonymous calls and
17 e-mails quite often.

18 Q **Sure. And not -- I don't -- I can't speak for**
19 **Mr. Bowling, but I can't imagine either of us are going**
20 **to ask you to divulge your sources, as a member of the**
21 **media.**

22 MR. BOWLING: You -- don't speak for me
23 because, if she's here voluntarily, yes, I ex- -- I
24 will be asking her questions about that.

25 MR. ANDREWS: We can address those objections

1 as we get going.

2 BY MR. ANDREWS:

3 Q Okay. So, there came a point in time after
4 you learned that Mr. Fewless was terminated that you
5 interviewed the mayor of Mount Dora, correct?

6 A The mayor, the PIO, and the city attorney.

7 Q Was Ms. Hayes there?

8 A Yes.

9 Q Okay. So, Ms. Hayes was there.

10 Who was the PIO at that meeting?

11 A Lisa McDonald.

12 Q Lisa McDonald.

13 And the city attorney -- is that Sherry
14 Sutphen?

15 A Yes, she was appearing by phone, though. She
16 was not there in person.

17 Q Okay. Was that a cordial meeting or was it
18 contentious?

19 A Contentious, definitely.

20 Q What types of questions do you recall asking
21 at that meeting?

22 A I asked why Mike Fewless was fired. I asked
23 if he was fired for speaking to me. I asked some
24 questions about their policies.

25 Q Well, let's start with that. When you asked,

1 was Mike Fewless fired for speaking with me, being you,
2 what were you told?

3 A Yes.

4 Q Did it seem like, at that meet- -- at that
5 interview, that they had an understanding of what your
6 conversation was with Mike Fewless or did it seem like
7 it was just, you two spoke, we don't care what it was
8 about, and we sent him packing.

9 MR. BOWLING: Objection.

10 A Yes, that is the impression that I got.

11 Q The latter?

12 A Correct, that you two spoke and he's got to
13 go.

14 Q Like, it -- like, it didn't matter, the
15 substance of the conversation, only that it -- that you
16 two spoke?

17 A That was the impression that I was under, yes.

18 Q Okay. Like, you guys could have said hello at
19 a gas sta- -- at the ra- -- local Racetrac, and that
20 could have been the same sufficiency for him to be
21 terminated under that policy -- is that the feeling that
22 you got?

23 MR. BOWLING: Objection.

24 A Yes.

25 Q Okay. Did the PIO, the mayor, the city

1 **attorney, or Ms. Sutphen seem aggravated by some of the**
2 **questions you were asking?**

3 A They all seemed aggravated by every question I
4 asked.

5 Q **Can you describe for me some instances or**
6 **examples that are memorable to you from that**
7 **conversation?**

8 A One of the things that I remember asking is
9 I -- had made a public re- -- I had been told by a
10 source that a whistleblower complaint was filed against
11 Robert Bell by the command staff.

12 I asked for that document. I did not get that
13 document. Another person provided that document to me.
14 They made a public-records request on their own. They
15 gave me the document.

16 I asked them why I was not provided that
17 document when I made a public request -- public-records
18 request on it. Ms. Sutphen, from the phone -- I -- I
19 actually directed that question to Lisa McDonald and
20 asked her why she did not provide that to me. And
21 Ms. Sutphen screamed across the phone, "Do not answer
22 that." And that just was very strange to me.

23 Q **Did you get the feeling that Ms. Hayes,**
24 **Ms. McDonald, Ms. Kraynik, and Ms. Sutphen was trying to**
25 **conceal what happened to Mr. Fewless?**

1 MR. BOWLING: Objection.

2 A They certainly didn't like that I was there
3 asking questions.

4 Q Let me ask the question a different way.
5 Did -- did you -- based on the questions you asked and
6 the answers that these women gave, did you get the
7 feeling that they were trying to hide something from
8 you?

9 MR. BOWLING: Objection.

10 A Yes. They did not want to answer my
11 questions.

12 Q In your line of business, when someone is
13 refusing to answer your questions or is evading
14 answering them, does that tend to make you believe that
15 you're on the right track?

16 MR. BOWLING: Objection.

17 A Almost 100 percent of the time. People tend
18 to get defensive when they don't like what you're
19 asking.

20 MR. ANDREWS: Ma'am, I don't think I have any
21 more questions for you, but I'm going to take a
22 quick five-minute break and go through my notes,
23 but I think I'm done. Okay?

24 THE WITNESS: Okay.

25 MR. ANDREWS: All right. Thanks.

1 (Brief recess.)

2 MR. ANDREWS: Ms. Aciego, I don't have any
3 further questions for you. Thank you for your
4 time.

5 I think Mr. Bowling has some questions for
6 you, now. I would ask that you give him the same
7 attention to detail in the questions and respect as
8 you gave me.

9 EXAMINATION

10 BY MR. BOWLING:

11 Q Ms. Aciego, my name is Mike Bowling. I
12 represent the City of Mount Dora. You're here today to
13 give -- to give a deposition, requested by the plaintiff
14 in this case.

15 Are you under subpoena?

16 MR. ANDREWS: Object to the form.

17 Q Are you under subpoena?

18 MR. ANDREWS: Same objection.

19 Q You need to answer.

20 MR. ANDREWS: Go ahead, yeah.

21 Sorry. When I object, I'm just, like,
22 objecting for the record, ma'am.

23 THE WITNESS: Okay. Yes, I am.

24 BY MR. BOWLING:

25 Q Did the subpoena require that you to produce

1 **any documents?**

2 A No.

3 **Q When were you served the subpoena?**

4 A It was e-mailed to me sometime last week, I
5 believe.

6 **Q You've been a reporter since when?**

7 A I started my career as a reporter, I think,
8 about 2002, 2003.

9 **Q Have you ever given a deposition in your
10 capacity as a reporter --**

11 A No.

12 **Q -- prior to today?**

13 **You worked for the Daily Commercial, which is
14 an old-school print newspaper; is that correct?**

15 A That's where I started my professional career,
16 yes.

17 **Q And you worked for them for what period of
18 time?**

19 A About five years.

20 **Q After the Daily Commercial, you -- what did
21 you do?**

22 A I was stuck in a non-compete for two years.
23 So, I did not work in the media at all for two years. I
24 did some odd jobs and then I got back into the media
25 around 2010.

1 **Q In what capacity?**

2 A I worked for a -- an international media
3 company in California.

4 **Q What's the name of that company?**

5 A Courthouse News Service.

6 **Q When did Lake Legal News start?**

7 A The magazine started around 2009, 2010; and
8 the online version, which includes breaking news,
9 started in September of 2019.

10 **Q My understanding is you're 50-percent owner of**
11 **the online version.**

12 A Correct.

13 **Q And you have no in- -- ownership interest in**
14 **the print version.**

15 A Correct.

16 **Q Who owns the print version, if you know?**

17 A James Hope.

18 **Q Hope, H-o-p-e?**

19 A Yes. Yes, sir.

20 **Q Does Mr. Hope have any interest in the online**
21 **version?**

22 A Yes, he is the other partner in the online
23 version.

24 **Q Am I correct that many of the articles that**
25 **are published online end up in the print version?**

1 A No, that is incorrect.

2 Q Do any of them end up in the print version?

3 A Feature-type stories, but not anything
4 breaking. And, actually, we have not published a
5 magazine since COVID started.

6 Q Other than Lake Legal News, do you have any
7 other s- -- employment?

8 A I work for C- -- for Courthouse News.

9 Q Okay. Now, you spoke about a meeting with the
10 mayor, the PIO. Was the city manager there?

11 A Yes.

12 Q And Sherry Sutphen, by phone?

13 A Correct.

14 Q Okay. That's the entire group?

15 A Correct.

16 Q All right. Was that meeting -- was that
17 conversation recorded?

18 A Yes, it was.

19 Q Okay. Do you have a copy of that recording?

20 A It's on my website.

21 Q Was that meeting held at your request?

22 A Yes.

23 Q What was the date of that meeting? Do you
24 recall?

25 A Give me one second.

1 July 29th.

2 **Q There's an article -- I have the print**
3 **version -- from the Lake Legal News -- I'm a little**
4 **confused about the way the dates work. The piece I'm**
5 **looking at is dated August 7, 2020, but there's a**
6 **reference to original publish date of 7/26/20. Is --**

7 A Original publish date would be the first time
8 that it was published. We have different spots on our
9 website where we can move things. And whenever we move
10 it, it redates it, but it always keeps the original
11 publish date.

12 **Q Do they get -- does the story get edited or is**
13 **this the -- 7/26 is the story?**

14 A It depends. Sometimes I will go back and add
15 stuff. It -- it really depends on if something has
16 changed. If it's not enough to write a new story, then
17 we'll just throw, like, an added detail in it.

18 **Q Okay. I think --**

19 A From my recollection, that story that you're
20 referring to was not changed -- to my recollection.

21 **Q So, that was published before you met with**
22 **the -- the mayor and others?**

23 A Which -- which story are you referring to?

24 **Q I'm referring to the, "Mount Dora police**
25 **deputy chief rapidly fired for seeking to bolster and**

1 **improve media relations."**

2 A Yes, that one was published -- wait a minute.
3 Let me double-check. Hang on just a second.

4 Oh, sorry. There it is. I'm sorry. I'm just
5 going over the story to make sure -- I'm just refreshing
6 my memory.

7 **Q Please do.**

8 A Yes, that was before the meeting with the city
9 officials.

10 **Q Was there an article -- I know you testified**
11 **that the recording is on the website, but was there an**
12 **article about the meeting with the mayor and others?**

13 A There's a little bit of background information
14 informing the readers what they're getting ready to
15 listen to. And we also added -- we had a company do the
16 transcript of the meeting and we added that, too, so
17 people could follow along.

18 **Q And the transcript would be on the website?**

19 A Correct. It's with that -- it's with the
20 recording.

21 **Q Okay. Now, you're the editor, so I -- I -- in**
22 **the past, I've had occasions where I've asked a reporter**
23 **about the title of a -- of an article and had him say,**
24 **that was the editor; it wasn't me.**

25 **You're the editor. So the title of this**

1 **article, "Mount Dora police deputy chief rapidly fired**
2 **for seeking to bolster and improve media relations" --**
3 **you wrote that?**

4 A I honestly can't remember if I wrote it
5 because my partner and I do work together on the
6 headlines. He often writes them and I, then, approve
7 them or disapprove and change things if I see fit.

8 **Q Do you believe -- do you believe this is**
9 **accurate; that he was fired for seeking to -- that**
10 **Fewless was fired for seeking to bolster and improve**
11 **media relations?**

12 MR. ANDREWS: Object to the form.

13 You can answer.

14 A He was -- yes. I mean, he had a conversation
15 with me and then he was fired for having a conversation
16 with me.

17 **Q Okay.**

18 A And that's what our conversation was about,
19 so --

20 **Q All right. If Fewless had met with you -- is**
21 **it your opinion that, if Fewless had met with you and**
22 **told you, I'm never going to talk to the media, he**
23 **wouldn't have been fired?**

24 MR. ANDREWS: Object to the form.

25 A I can't speak for what the City of Mount Dora

1 is going to do. I can't -- I don't...

2 Q Your -- your conclusion that he was fired
3 for -- for seeking to bolster and improve media
4 relations is temporal. He spoke with you about this; he
5 got fired after that.

6 A I mean --

7 Q Is there any other basis?

8 A When I spoke with the city officials, they
9 told me he violated their policy about talking to the
10 media. So, that tells me he was fired for talking to
11 me.

12 Q I'm doing it poorly, but let me tell you what
13 I'm trying to get at. Is it your understanding he was
14 fired for the content of the communication or for the
15 communication, itself?

16 MR. ANDREWS: Objection.

17 A For the comm- -- I'm sorry.

18 MR. ANDREWS: Sorry. Go ahead.

19 A For speaking to me, period.

20 MR. ANDREWS: I'll withdraw the objection.

21 BY MR. BOWLING:

22 Q All right. Now, within this article, there's
23 a reference to -- I don't know how it is before you --
24 to -- "The meeting was July 17th, (When LLN arrived at
25 Fewless' office, Chief Robert Bell was leaning against a

1 nearby wall and appeared displeased to have LLN inside
2 the department.)" You write that?

3 A Yes, I did.

4 Q Okay. You have any contact -- did you have
5 any communication with Bell while you were at the office
6 that day?

7 A I nodded my head at him and said, "Robert."

8 Q Did he say anything to you?

9 A I think he spoke to me by name, too, if I
10 remember correctly. He said, "Marilyn," and I said,
11 "Robert."

12 Q Did you have a badge on or anything like that,
13 indicating --

14 A I don't think I had my press pass on that day,
15 but Robert is well aware of who I am.

16 Q When was the last time you had any
17 communication with -- with Robert Bell?

18 A Other than that instance?

19 Q Yes.

20 A I honestly cannot remember.

21 Q Years?

22 A Years.

23 Q All right.

24 A Let me backtrack for a second. I just
25 remembered this. I did not speak to him, but we had a

1 carjacking that started in Mount Dora and ended in
2 Eustis, and he was on the scene. It was actually
3 Eustis' case because it ended in Eustis, so I had to
4 deal with the Eustis PIO.

5 The Eustis PIO came to the crime-scene tape
6 and got me, and Robert sat there and gave me a very
7 dirty look while the other PIO was coming to get me. He
8 didn't say anything, but his look spoke a thousand
9 words.

10 Q Didn't take a picture of that look, by any
11 chance, did you?

12 A No, I did not.

13 Q All right. Okay. Let's just be clear here,
14 you don't like Robert Bell?

15 A I would say that's fair.

16 Q Okay. When was --

17 A He didn't like me either.

18 Q When was this incident -- Eustis -- was it --

19 A Oh, that --

20 Q -- a carjacking? Is that what you said?

21 A Yes, it was a carjacking -- let me see -- I
22 think it was November of '19, but let me double-check.
23 That story published on November 22nd, 2019.

24 Q Okay. Thank you.

25 All right. In this article, there's a

1 reference to, "On Thursday, LLN was tipped off to
2 Fewless' firing." Who tipped you off?

3 A I don't know.

4 Q L- -- "LLN spoke to Fewless' attorney, Ryan
5 Andrews, Thursday afternoon and Friday morning."

6 How did you know that Mr. Andrews was
7 representing Fewless?

8 A It's public record.

9 Q What's the date -- when you say Thursday,
10 could you give me the particular date you're referring
11 to?

12 A I believe it would have been the Thursday
13 after I spoke to Fewless. So, if that was July 17th --

14 Q The 23rd?

15 A That sounds about right.

16 MR. ANDREWS: Hey, Mike, I don't mean to
17 interject, but I think it's probably fair to say
18 I'm not going to be making my 4:00, my 4:30, or my
19 5:00 calls, right?

20 MR. BOWLING: I'm going to be done in probably
21 ten minutes, but --

22 MR. ANDREWS: Oh, okay.

23 (Discussion off the record.)

24 BY MR. BOWLING:

25 Q Your understanding is you became aware that

1 **Ryan Andrews was the lawyer for Fewless, based upon**
2 **public records?**

3 A Yes.

4 Q Do you know what public records?

5 A He represented Fewless in another case, and I
6 looked it up on the Clerk of Court's website.

7 Q Okay. And you took a shot that he was
8 **representing -- was going to represent him in this case?**

9 A Yes. I figured it was a good place to start.

10 Q And that other case would have had something
11 to do with -- I've lost the name of the city. I want to
12 **say frost-proof, but it's not frost- --**

13 MR. ANDREWS: Fruitland Park.

14 MR. BOWLING: Fruitland Park. Thanks.

15 MR. ANDREWS: Hey, Mike, to be fair. I had,
16 like, five people reach out to me. If you send me
17 an interrogatory, I'll list them all for you.

18 MR. BOWLING: Okay.

19 BY MR. BOWLING:

20 Q How many times have you spoken to plaintiff's
21 **counsel about the termination of Michael Fewless?**

22 A I'd say probably maybe three.

23 Q When was -- prior to today, when was last time
24 **you spoke with plaintiff's counsel about this?**

25 A About this, today, or about this case?

1 **Q About this case.**

2 A It's been a couple of months.

3 **Q In the article, it goes on to say: Multiple**
4 **sources reached out to LLN since Thursday and told LLN**
5 **that Fewless was allegedly fired by city manager, Robin**
6 **Hayes, at the urging of Bell.**

7 **Can you give me those sources?**

8 MR. ANDREWS: One --

9 A No.

10 MR. ANDREWS: Hold on a second. Oh, you --
11 let me lodge an objection, first. And then,
12 Ms. Aciego, if you have an objection, you can
13 assert one as well.

14 First I'm going to object to the question on
15 Florida Statute 90.501(5). I'm going to also
16 object under the Florida Constitution Article 1,
17 Section 4. I'm also going to under Branzburg v.
18 Hayes, State v. Davis, Tribune v. Huffstetler.

19 All of those cases -- before she is required
20 to even answer that question, you are required to
21 obtain a court order at le- -- and we'll start with
22 the statute.

23 By statute, you're required to obtain a court
24 order showing that the information that you seek is
25 relevant and material to unresolv- -- and I

1 appreciate -- this is going to take a minute,
2 but -- so, hold on. Bear with me.

3 The information is relevant and material to
4 unresolved issues that have been raised in the
5 proceeding for which the information is sought;
6 "B," the information cannot be obtained from
7 alternative sources; and "C," if compelling
8 interest exists for requiring disclosure of the
9 information.

10 THE COURT REPORTER: Slow down.

11 MR. ANDREWS: Oh, sorry about that.

12 THE COURT REPORTER: Thank you.

13 MR. ANDREWS: And I'm quoting 90.51(5)(2)(a)
14 through (c), there.

15 THE COURT REPORTER: Thank you.

16 MR. ANDREWS: The privilege exists in the
17 similar form as interpreted by the 11th Circuit and
18 by the Florida Supreme Cir- -- 11th Circuit and the
19 Florida Supreme Court.

20 So, while I can't instruct this witness not to
21 answer -- which I believe she's here under my
22 subpoena, not the City of Mount Dora's -- but
23 nonetheless, I believe -- and it's Mr. Fewless'
24 position -- that she is not required to answer that
25 question or tell you or the City of Mount Dora,

1 without court order, who her sources are for that
2 article or any other article; and that our position
3 also is that she's -- not only is she not violating
4 the subpoena, that that -- her refusal would comply
5 with state and federal laws. She's entitled to
6 refuse to answer the question.

7 And, in fact, demanding that she refuse the
8 question would in- -- indeed, violate Florida
9 Statutes, Florida state law, and federal --
10 applicable federal law.

11 With that objection and advising all parties,
12 both the City of Mount Dora and Ms. Aciego,
13 Mr. Fewless' position, to succinctly summarize it,
14 we don't believe Ms. Aciego is required to answer
15 that question at all.

16 And, to the extent that it pre- -- it -- you
17 continue to pursue it, I would just ask that you
18 set it aside. We can take it to the court. And if
19 the court orders it, she can finish her depo at
20 that point.

21 Otherwise, I think that a continued cross-
22 examination on that particular question, asking who
23 the sources are, would violate her statutory and
24 state and federal constitutional rights under
25 journalist-qualified privilege.

1 MR. BOWLING: Okay.

2 BY MR. BOWLING:

3 Q I just need to be clear, you're refusing to --
4 Ms. Aciego, you're refusing to disclose your sources
5 based on the journalist privilege that you're asserting;
6 am I correct?

7 A Correct. Yes.

8 Q You have -- however, you have voluntarily
9 spoken with plaintiff's counsel about the issues in this
10 lawsuit on at least three occasions?

11 MR. ANDREWS: I'm not -- to be clear, I'm not
12 objecting about that. I don't think I'm considered
13 an anonymous source, but I'm not objecting to
14 those; I'm talking about the anonymous sources you
15 asked her about.

16 Q And I'm just asking -- I want to be clear that
17 you've voluntarily spoken with plaintiff's counsel about
18 this lawsuit on at least three occasions?

19 A Yes, but I spoke with him about my article,
20 too. And he was not an anonymous source because he went
21 on the record and gave me a quote.

22 If I didn't protect my sources, sir, I
23 wouldn't have a lot of stories because people are
24 terrified to come forward because things like this
25 happen.

1 **Q When was the last time you spoke to Michael**
2 **Fewless?**

3 A It's been several months.

4 **Q Did you speak to Michael Fewless after he was**
5 **terminated?**

6 A Yes, I did.

7 **Q What was the gist of that conversation?**

8 A I called to see what had happened and --
9 because I told him I had heard he had been fired. And I
10 also apologized to him because I felt like I got dragged
11 into the middle of this and it -- his conversation with
12 me was used to fire him.

13 **Q What did Mr. Fewless say to you during that**
14 **conversation?**

15 A He didn't say much. He more listened than he
16 talked. And he actually mentioned he had COVID at the
17 time, and I told him that I was very sorry to hear that
18 he had COVID and hoped he recovered from it.

19 **Q Was that the last time you spoke to**
20 **Mr. Fewless?**

21 A To my recollection, yes.

22 **Q Okay. Did you speak to plaintiff's counsel**
23 **today, prior to this deposition?**

24 A This morning, yes.

25 **Q Okay. So, that would have been the fourth**

1 **time you spoke to plaintiff's counsel about this case or**
2 **the third time?**

3 A I think that was the third.

4 **Q Okay.**

5 MR. ANDREWS: What about my rights, Mike?
6 Just kidding.

7 MR. BOWLING: You're a lawyer, man. You don't
8 have any rights.

9 MR. ANDREWS: I have no rights.

10 BY MR. BOWLING:

11 **Q All right. There were some questions about**
12 **the amount of views your article gets -- your articles**
13 **get on -- I don't want to say lifetime news -- Lake**
14 **Legal News.**

15 A Yes, sir.

16 **Q Those views don't tell you who saw it --**

17 A No.

18 **Q -- do they?**

19 A No.

20 **Q So, you can't testify that, of the 2,000 or**
21 **4,000 or 8,000, that the city manager saw any of those**
22 **articles.**

23 A No.

24 **Q Now, have we -- have you talked about all the**
25 **articles that you've written involving the Lake -- the**

1 **Mount Dora Police Department for which there was**
2 **references or quotations of law enforcement officers?**

3 A I think the only one -- there was two I
4 believe we did not mention. There was one about two
5 teenage boys were arrested on the Mount Dora High School
6 campus for having a gun.

7 **Q What -- can you give me a date on that?**

8 A Yeah, give me just a second.

9 You know what? Actually, I called Mike
10 Fewless about that and he didn't know very much. And
11 then the press release went out to the entire media
12 later that evening. So, actually, I did not speak to
13 him on the record about that case, but it was
14 January 23rd of '20.

15 And then I did a follow-up on the Lowe's
16 murder -- oh, wait. I'm sorry. That's not a follow-
17 up. That's the original story. I'm sorry. I thought I
18 did I follow up. Oh, the follow-up was the day that I
19 spoke to Mike Fewless at the police department.

20 And then I spoke to Coy Hunter while I was
21 there, and Captain Hunter gave me a quote. And the date
22 on that was July 17th, the same day as the meeting.

23 **Q Okay. So, at the meeting with Fewless, you**
24 **spoke to Coy Hunter that same day?**

25 A After -- yeah, same day.

1 **Q And he gave you a quote regarding the Lowe's**
2 **case?**

3 A The Lowe's case and the double shooting in the
4 northeast community and basically just told me they were
5 both still under investigation.

6 **Q Will that -- does that quote appear anywhere?**

7 A Yes, it's in this article.

8 **Q Okay. Was that --**

9 A The headline on that article is "Mount Dora
10 Police continue to seek answers in recent separate
11 shooting incidents."

12 **Q Okay. The date of that article?**

13 A July 17th.

14 MR. BOWLING: Oh, okay. Thank you.

15 Listen, that's all I have. I appreciate you
16 taking the time to talk to me. I'm sure Ryan will
17 have questions for you.

18 FURTHER EXAMINATION

19 BY MR. ANDREWS:

20 **Q I'm not sure that I do -- oh, when you said**
21 **that you spoke with the Eustis PIO, you were talking**
22 **about the Eustis Police Department PIO, correct?**

23 A Correct. They have an actual law
24 enforcement -- a sworn law enforcement officer who is
25 their spokesperson.

1 MR. ANDREWS: Okay. All right. I don't think
2 I have any further questions for you, ma'am.

3 Mike, I do want to put on the record, I -- I
4 can understand why you would be interested in her
5 confidential sources if Mike Fewless could
6 technically be one, but I think that would require
7 you, since you've already taken his depo, to send
8 an interrogatory asking it because he wouldn't be
9 able to assert that privilege; only she would.

10 So, to the extent that's where you're going
11 with it, send one over. We'll be happy to answer
12 it. I, frankly, don't know the answer one way or
13 the other. I hope it's no, but I don't know, but
14 send it over.

15 I don't -- I don't think the privilege would
16 apply to him. And we had this conversation and, in
17 any event -- actually, I'm fairly confident it
18 wouldn't, but you know, the case law is whatever it
19 is, but I do think that that would probably be a
20 least- -- the less-intrusive means than trying to
21 force a journalist to -- you know, to enforce a
22 Court to allow the privilege to not apply to her in
23 that circumstance.

24 MR. BOWLING: Okay.

25 (Whereupon, the deposition was concluded at

1 4:07 p.m., and the witness did not waive reading and
2 signing.)

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CERTIFICATE OF OATH

STATE OF FLORIDA)
COUNTY OF LEON)

I, ANDREA KOMARIDIS WRAY, the undersigned authority, certify that the above-named witness appeared before me via videoconference pursuant to the Supreme Court's Order AOSC20-13 and was duly sworn.

WITNESS my hand and official seal this 22nd day of March, 2021.



ANDREA KOMARIDIS WRAY
NOTARY PUBLIC
COMMISSION #HH 089181
EXPIRES February 9, 2025

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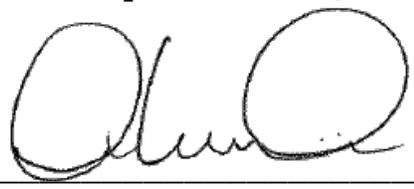
CERTIFICATE OF REPORTER

STATE OF FLORIDA)
COUNTY OF LEON)

I, ANDREA KOMARIDIS WRAY, Court Reporter,
certify that the foregoing proceedings were taken before
me at the time and place therein designated; that my
shorthand notes were thereafter translated under my
supervision; and the foregoing pages, numbered 1 through
52, are a true and correct record of the aforesaid
proceedings.

I further certify that I am not a relative,
employee, attorney or counsel of any of the parties, nor
am I a relative or employee of any of the parties'
attorney or counsel connected with the action, nor am I
financially interested in the action.

DATED this 22nd day of March, 2021.



ANDREA KOMARIDIS WRAY
NOTARY PUBLIC
COMMISSION #HH 089181
EXPIRES February 9, 2025

