CITY OF NEW ROCHELLE
BOARD OF ETHICS
----------X
IN RE: :

ETHICS COMPLAINT OF ROBERT COX :

----------X

515 North Avenue
New Rochelle, NY 10801
April 12, 2022
4:40 p.m.

Examination of CHARLES STROME and KATHLEEN GILL, in the above-captioned matter, held at the above time and place, before Howard Breshin, a Notary Public of the State of New York.

A P P E A R A N C E S:

WILSON, ELSER, MOSKOWITZ, EDELMAN & DICKER, LLP
Attorneys for the ETHICS COMMITTEE
1133 Westchester Avenue
White Plains, New York 10604
BY: PETER A. MEISELS, ESQ.
914 391-3690

ALSO PRESENT:
CHARLES PHIPPS, Ethics Committee Member
DAVID BLUMENTHAL, Ethics Committee Member
NEW ROCHELLE LAW DEPARTMENT
BY: DAWN WARREN, ESQ.

STROME

C H A R L E S S T R O M E, a witness called on behalf of the City of New Rochelle, having been first duly sworn, was examined and testified as follows:

THE COURT REPORTER: Can I have your name and address for the record.

THE WITNESS: Charles Strome, 515 North Avenue, New Rochelle, New York, 10801.

EXAMINATION BY

MR. MEISELS:

Q. Mr. Strome, we probably made a tactical mistake in having you be our first witness because after we heard from other people we have got a few questions, not a lot. To a large extent they really relate to some of the specifics that we didn't know to ask and also to get a sense of the timeline.

A. Okay.

Q. So this may appear to you to be somewhat disjointed, and the reason for that is we are not going to repeat what you already told us and it is just a question of filling in some blanks.

STROME

A. Okay.

Q. In reference to what was actually the second complaint concerning an alleged effort to try to have you rescind the appointment of Kathleen Gill as the deputy city manager, I have a couple of questions.

At any time did the mayor say to you in words or substance that I don't want to stick the new city manager with her?

A. So the only change that would be, I don't think he said her, he just said I don't want to stick-- I don't know if stick was the word or hinder the new manager with a management team already in place when we hire the new manager.

My assumption, of course, obviously that dealt with the deputy city manager position which, you know, a little surprising to me because I appointed a human resources commissioner and a development commissioner and a finance commissioner all within the last three or four months and commissioner positions are actually higher on the management scale than the deputy city manager is so we sometimes have

deputy city managers, we sometimes don't and I was a little taken aback only because chief of staff and deputy city manager in my view, and if you read my memo are essentially the same thing anyway. I was just kind of formalizing what was already in existence. So I won't say those exact words but that was the substance of what I got, yes.

Q. Were you ever informed by any councilperson that the mayor spoke to Martha Lopez-Hanratty and Yadira Ramos-Herbert in a conference call concerning your appointment of a deputy city manager and suggested that they were also opposed to it, as he was, that they join him in visiting you to express their concerns?

A. I was told that the mayor made several calls about this subject. The four people he called were Councilmember Fried, Councilmember Lopez, Councilmember Kaye, Councilmember Ramos Herbert to see if there were four people, because we have a seven person council who had the same concerns as him and that if there were, he was going to come talk to me about those concerns. So I was told that but that was third-hand

information, somebody telling me something somebody else told them, so I was told that and in fact, I was also told that he was, you know, or maybe I just deduced that he was gathering three votes to terminate my employment which is the reason I went to see him the next morning and that's when he said no, I was just concerned about the timing of the deputy city manager appointment.

Q. Was there any reason that he needed three other council people before he could express that opinion to you, that he was concerned about the timing of it?

A. That has never been the history. If he or any member of the council had a concern, they were always free to talk to me individually. No one has ever come to me as a group, actually, so I was a little miffed there was an attempt to get three votes because we never had that kind of dynamic.

If it is a concern about a personnel appointment or some other matter that is going on, council people and several mayors, two of them, anyway, have never felt the need to

STROME

get votes to come in. That's what I was told was going on so, you know, if he was getting votes to come talk to me that would have been a very unusual circumstance. That was never required before nor does it really matter, honestly.

I think I said this the last time, he can have seven votes, it doesn't matter. My belief is that on matters of personnel it is totally up to the city manager and the council has no real input. I can inform them. I can ask for input but they really have no say.

I think the charter is relatively clear all these appointments are at the discretion of the city manager, so in this instance, if somebody came and said they had seven votes I would have said I don't really care, this is my appointment and I am making it. So that aspect of the events surprised me.

There was never_-- I don't remember ever in my time as city manager where anybody has come to me saying I have four votes to express a concern about something.

Q. Did you ever learn from any councilperson that the mayor advised Martha Lopez

STROME

and Yadira Herbert that both councilpersons Sara Kaye and Liz Fried agreed with his position on the appointment of a deputy city manager?

A. I heard a lot of things but I never heard that dynamic. I heard that he had two people and went to one of the other ones. I don't think he ever, from what I was told, that he never had Liz Fried. I was told that he had-- he talked to Martha and said I have Yadira and Sara and you would be the fourth, and I was then told again third-hand that she said no, but I think from what I gather, from what I heard again third-hand, that Martha and Liz didn't entertain the discussion at all. Sara and Yadira might have entertained it but in the end, whether they decided to agree or not agree, apparently because there wasn't four, he was never going to come see me but I did go to see him because I was a little annoyed the next morning when I heard about all this.

Q. In reference to the allegations that he sought an appointment for himself to be commissioner, okay, we would like to do two things. One, get a sense of the timeline and

two, some facts came to our attention during the course of this investigation that we just didn't ask you about it. We want to clear this up.

Am I correct, and please let me know if I am not, that the practical timeline begins when you had a conversation with him saying that you are having a hard time finding a suitable applicant for the commissioner of economic development and said to him why don't you apply; is that sort of the beginning of it?

A. That's correct.

Q. And am I correct that it ends with a memo that you wrote, the memo you wrote to the mayor?

A. Correct.

Q. Approximately between the time that you had that initial conversation and the time that you delivered that memo to him, how much time transpired?

A. I would say it was-- my memory is not like what it used to be. I would say like a year, maybe a little more than a year.

Q. Okay.

A. I can go through it if you want me to

go through the time. I can go through what happened.

Q. That would be great.

A. Okay. So my recollection is that it started with the comment, offhanded or not it came from me, maybe you should apply because I was quite frustrated that we hadn't had a good recruitment. I figured it was a good job.

He then came back to me and said-- I was a little surprised but he came back and said yes, this might be something I might be interested in so I said okay, we'll give it some thought.

There was some discussion among myself and others on the staff, high level people and I was struggling with it from shortly after the beginning because it is very unusual and I was kind of kicking myself for starting this process but I accept responsibility for that.

At one point I was very much leaning in not going in this direction and cutting it off, and Kathleen Gill and I had lunch with the mayor where I expressed my concerns about the optics of it and how I didn't think it

was really something that we could proceed with, and his response was the optics aren't really important. If you think I am the best person for the job you should consider hiring me.

The next meeting was a meeting with Kathleen and myself and the mayor where Kathleen said that she was uncomfortable being involved in these discussions. She thought there might be some charter implications and she withdrew and wasn't involved anymore after that.

Shortly after that, I can't remember how long, I went to the mayor and said I am not comfortable doing this, I do have charter concerns and some ethics concerns but I am not comfortable doing it.

A few days later, I believe it was, he came back to my office and asked me to reconsider. Reluctantly I said yes saying that perhaps if the second round of recruitment provided no appropriate candidates it could be a consideration. I suggested he take part in the application process by submitting a resume. He said he did not want to do that, and then there was really no formal conversation after that but

he would bring it up, how is your search going? How many candidates are there? Why was it taking so long? And then we went through the process.

By the way, the person who was appointed, Adam, our internal person was not a participant in the first round. He applied the second time. Then towards the end of that process when the recruitment firm, we engaged a recruitment firm to help us engage in the second recruitment. They had narrowed down the resumes and he asked for a copy of the resumes which I gave to him because this is the conflict that I had. He is the mayor, and not that he has any say, but I always had shown the mayor a few other times that we hired development commissioners, mayors happen to be interested in development, who the finalists were just for their information and I did the same with the police commissioners and some other high level commissioners.

He said-- he tapped the resumes and he said it is obvious I am the best candidate and that's when I decided I had to write the memo to cut this off.

I also requested and received

shortly after that an ethics opinion from my professional organization which you folks had seen which said no.

So it was a difficult time because I knew he was_-- I want to try to be clear here. There was no outward pressure by him put on me although. I felt his interest was pressure enough after I had already said no and that made me uncomfortable but it wasn't because he was, you know, demanding that he get the job or demanding that I make a decision, it is just the nature of the events and him remaining interested in it and really being interested in it.

I think_-- I don't know what he would tell you but I think he really wanted the position so I had a lot of uncomfortable moments during that time, and a memo which maybe I should not have written in the end was my way of really just ending it and that's why I wrote the memo, got the opinions that I did, both the charter opinions and the ethics opinion.

I had never had a conversation with him about that memo or those opinions. He accepted the results of them. There was never

STROME

any problem with that after I gave him the memo.

The next thing was, the second memo that I sent about the deputy manager and Adam being the commissioner, that's when all this other hoopla began, so that's my recollection of the timeline on the development of the commissioner of development position.

Q. Now, you had mentioned that there was a point in time when you and the corporation council had lunch with the mayor. There was a time that you and corporation council and the mayor had lunch together to discuss this.

A. Correct.

Q. And at that time there was a discussion as to whether or not this would be a good idea, am I correct?

A. The purpose of the lunch, from my perspective and I believe Kathleen's prospective, was sort of indicate to him that it really wasn't a good idea to pursue this any further.

Q. And I know that you ultimately got an opinion from outside counsel. Did the corporation council offer an opinion as to what she thought about the legality of that?

A. She said she had some concerns, and as a result I asked her to contact the outside attorney. I felt it would be better to get an opinion from an outside attorney on a matter of this because she works here and works closely with myself and the mayor. I didn't think it would be appropriate or fair to put her in a position to have an opinion on that so we asked for outside counsel for an opinion.

Q. Now, did there ever come a time that the mayor initiated a meeting with you and advised you that he thought that the position that you were taking was standing in the way of his career?

A. When he asked me to reconsider he did say this was a pivotal moment in his career but I wouldn't say it is fair for me to say that he said I was hindering his career, but he made it clear to me that this is a direction that he wanted to go and that he would like the position, so I guess I could have assumed that I was hindering his career but I wouldn't put it in those terms. He just let me know that he really wanted the position and so you would have to ask

him if I was hindering his career.

Q. All right. Did he ever say to you in words or substance, this is my career, I need an answer by the end of the year?

A. He never gave me a deadline on when he needed an answer. Although he might have indicated because of the fact that he is up for election next year that that would be the timeline. I don't think he ever demanded anything.

In the end I don't recall him ever saying I need an answer from you.

Q. Okay.

A. I will say this. He did tell me that he was also going to be applying for another position outside of the city which I encouraged him to do and he told me that he was a finalist and then came to me I am withdrawing myself from that position because I really want to be the development commissioner. This is where his heart is but there was no demand behind that. It was just informational.

Q. Now, as I understand it, before there was a meeting with the mayor, with the

corporation council and yourself to discuss his desire to be appointed to the position of commissioner.

A. So after the lunch and after the meeting that I told him no, there was only one other formal meeting which is when he came and asked me to reconsider, and after the lunch there were no meetings with the corporation council on this particular subject.

The discussions, though, happened informally. He would mention it to me, "Where are you with the recruitment?" He asked me for my advice on his seeking this other position. He came to me to tell me that he was withdrawing from that application process and he would ask me for updates on the development commissioner job, what was taking so long for the recruitment firm? It wasn't a malicious question. It was summertime. People don't apply for jobs in the summer so it was really going to be a fall recruitment so there really were no formal meetings scheduled to discuss this but it kept coming up and I meet with the mayor once a week so it would come up. He would occasionally ask

me how it was going in those weekly meetings, among other things.

Q. You referred to formal meetings and informal meetings. What is the difference between them?

A. So lunch was probably the only scheduled formal meeting on this subject because we scheduled a meeting to specifically talk about this subject. Every other time was basically I would go into his office or he would come into my office and just bring it up. It wasn't a scheduled meeting. It never appeared on my calendar as a meeting to discuss a position of development commissioner, so the lunch, however, did, so I call that a formal meeting when you set something up.

Q. I just want to understand. So a formal meeting would be one that was preplanned and scheduled?

A. Correct.

Q. While informal would be_--

A. Came up in the context of another meeting or just sidebar, whatever you want to call it.

STROME

Q. Now, you had mentioned that there was a meeting from which Corp Counsel excused herself, is that right?

A. She said she was uncomfortable being involved in a further conversation about this. I believe she mentioned she had some charter concerns and she said she didn't want to be involved in the discussion anymore and that was shortly after the lunch. That is my recollection of the timeline.

Q. Okay. Did the mayor suggest to her that if she was feeling uncomfortable that maybe she should step out?

A. No, because she just stepped out.

Q. Okay.

A. I don't think_-- you have to ask him. I don't think he understood her discomfort but it didn't matter, she wasn't comfortable and she had some concerns so, you know, in the end it was going to be my decision anyway, so...

MR. BLUMENTHAL: Peter, may I cut in?

MR. MEISELS: Sure.

MR. BLUMENTHAL: When Kathleen

STROME

said that she has charter concerns, how frequently did she offer her, I will say, her legal opinion? I don't want to say summarily, I don't mean it in that context but it was ignored. I mean I think you said in the prior hearing or whenever, part of the investigation, you said the mayor sort of didn't take it and said I don't think that is an issue.

THE WITNESS: I am not sure it was her opinion. I cited specific language in the charter which I read, so he dismissed my concern which was there is a section of the charter that says no member of the city council, and as you all know a mayor is a member of the city council, shall be appointed to the city manager during their term of office, and I said I would deduce from that that they wouldn't be appointed to any commissioner type position because the assumption would be that no city manager would appoint an elected

STROME

official to a management position. That's the reason there is a city manager in the first place.

You know, you have to ask him but his immediate reaction to that was he did not agree, and when Kathleen had mentioned_-- I didn't have real significant conversations with Kathleen on her charter concerns, she said she had them, I had them, mentioned it to him.

He disagreed with my position on that and I said so I am going to get a legal opinion on that to see what it means. So that's when I asked Mr. Toomey-- I asked Kathleen to ask Mr. Toomey for the opinion on the charter.

MR. BLUMENTHAL: Also, go back about seven or eight minutes ago. You said you didn't feel pressure but you did feel pressure.

THE WITNESS: So it is hard for me to explain this, but when one of your employers, he's one of my employers, is

STROME

applying for a job or suggesting he would like a job and I have already said no and he asked me to reconsider, because of the nature of that relationship I believe there was inherent pressure.

So he wasn't coming into my office every day saying is there a decision, am I going to be it? The simple fact that he was still interested in it at least to me made me feel uncomfortable and pressured because I didn't really want to be in a position of having to turn him down for this because of the relationship I have with him and because of the working relationship I have with him, so I don't know how you characterize it but I believed the fact that it proceeded and continued after I originally said no, I felt tremendous pressure in that he was not happy with my decision that he wasn't the person and that he wanted to keep it going.

I never felt that I was going to

STROME

be terminated if I didn't appoint him. I never felt he was going to make my life miserable if I didn't appoint him, I just felt it was uncomfortable and I felt pressure that he really wanted this position and I really didn't think there was a way to do it and I probably expressed that to quite a few people.

I probably expressed it to the council people who I spoke with and I had told the mayor in the beginning I was going to talk to a few members of the council and I spoke to Councilmember Tarantino and Councilmember Lopez. Counsellable Tarantino then spoke to Councilmember Hyden.

I had lunch with Councilmember Tarantino specifically about this, told him how uncomfortable it was making me feel and I am just not sure if that lunch was before or after the original no. It was probably before because I was talking to those folks before I

STROME

told him the ultimate decision, the first decision, but I saw Councilmember Hyden a couple of times in his store because I was buying some things for Christmas and he mentioned it to me and I expressed to them how uncomfortable I was and I felt some pressure that he really wanted this job and I was not comfortable giving it to him and that made me very uneasy.

So I want to be clear.

MR. BLUMENTHAL: It was just the relationship that caused this?

THE WITNESS: I don't know whether the mayor could be assuming I was pressured but I do want to be clear. There was no overt, you know, you must tell me, you must do this, you must hire me. That was never a part of the equation, but I do think coming back to me after I had said no and saying please reconsider through the second process, not participating in the second process, there was inherent

STROME

pressure by those actions.

If it was meant or not I don't know. I am not a mind reader, but I did feel it.

MR. BLUMENTHAL: You can plow ahead.

MR. MEISELS: Okay.

Q. As we understand it you did conduct a search to fill the position of commissioner of economic development?

A. We hired a recruiting firm to do it for us.

Q. And based upon their efforts you received resumes?

A. That is correct.

Q. And as I understand it the mayor asked to review those resumes?

A. Yes, in fairness as did Councilmember Tarantino. I provided them to both of them and I would have provided them to any councilmember who would have asked with the caveat that it is for information only.

Q. And based upon his review of them did he express the opinion that he was more qualified

than any of the applicants?

A. He did, not any of the applicants. I think I provided him with the finalists. There were a number of applicants. I don't think I gave him all 70, but whatever the watered down list was. I can't remember if I gave them all but it doesn't matter. The finalists were obviously included in the resumes I gave him.

I mean he sort of tapped the resumes, come on, it is obvious I am the best candidate.

Q. Now, in terms of the timeline of this, did that occur-- that occurred before you wrote your memo?

A. Right before.

Q. Okay. So would it be fair to say that you wrote your memo probably about five or six weeks ago?

A. To be fair, that conversation happened a couple of weeks before that, prior to the interviews that we conducted.

Q. So that would mean that that would have occurred probably sometime in February of 2022?

A. Yes.

Q. And that would, am I correct that would be a little more than a year before you had your initial conversation with him?

A. Yes.

Q. Okay. Now, based upon-- we understand Councilman Hyden was one of the councilpeople you consulted?

A. No, he consulted me. My intent was to consult with Councilmember Tarantino, who is the Republican, and Councilmember Lopez who was a Democrat to just get their feelings which I did, and Councilmember Tarantino I think passed it along to Councilmember Hyden so I didn't proactively speak to him, he brought it up to me.

Q. Now, as I understand it he has a gallery?

A. He does.

Q. And you are one of his customers?

A. I used him several times.

Q. Drawing your attention to December of 2020, okay, did you_--

A. '21, I think.

Q. '21. I apologize. Let me rephrase

that, withdraw and rephrase the question.

Did there come a time that you discussed this issue with him in his gallery?

A. Yes.

Q. And when was that?

A. I think it was twice, December when I ordered the Christmas gift I was getting for somebody and then in January because he had to touch it up, so twice.

Q. Okay. That would be_--

A. '21 and then January of '22, I think, were the times.

Q. Okay. And who brought the subject up?

A. It is probably mutual. He might have asked me what was going on and I don't remember. I will tell you that on some occasions I took the initiative to unburden myself with all this discomfort I was self-inflicting upon myself.

Q. Did you tell him that you repeatedly told the mayor that you couldn't do this and nevertheless the mayor continued his efforts?

A. I would say everything in that is accurate except for the word repeatedly. I told the mayor once that I couldn't do it and he

STROME

continued after I told him no.

Q. And did you express to Councilman Hyden how you felt about it?

A. Yes.

Q. What did you tell him?

A. Basically what I told you a couple of minutes ago, that I was feeling pressure because of the circumstances around myself, his position, the mayor. Again, I don't want to cast dispersions that there was direct pressure but there was certainly indirect pressure.

Q. In terms of this pressure, of course nobody knows how somebody else feels or what they intend, but so the question is about how you felt.

A. Yes.

Q. Which you described. Did you ever_--

A. I can perhaps put it in a_-- I believe I have been clear on this, that a continued conversation after I originally said no was unfair to me and resulted in everything that I felt after that.

I think that the conversation should have been over, in my opinion, after I

STROME

said no, and the fact that it continued at his request bothered me and made me feel pressure. That's the best way I can describe it.

Q. Did you ever learn that Councilman Hyden actually confronted the mayor on January 21st of this year?

A. Yes, he told me he was going to and then he told me he did.

Q. Okay. How did you feel about that?

A. I felt pretty good. I felt the more people that told him it wasn't a good idea the better for me.

Q. Okay. Fair enough. Now, in reference to the conversations you already described that you had with Councilman Hyden, am I correct you had similar conversations with Councilman Tarantino?

A. The first one was more formal and then after that just occasionally, yes, I had lunch with him to really gauge his reaction if I would consider it and then a few more after that but they were informal.

Q. Meaning they weren't scheduled?

A. Correct. I didn't_-- you know, we

talk on other issues and he would ask me what is going on with this.

Q. And did you share with him how you felt about it?

A. Yes.

Q. Did you share with him internally how you felt in terms of the pressure you were feeling?

A. Yes.

Q. Okay. And on one occasion you did that over lunch?

A. Well, the lunch was to_-- was prior to my initially telling the mayor no, and as I said I was going to just broach the subject. I told the mayor I was going to do this, broach the subject with some elected officials to get their reactions so I cover all the bases so that lunch was prior to me telling the mayor, you know, and then there were other conversations over the eight months after that initial declining to make the appointment.

Q. Okay. When Councilman Hyden reported back to you that he on January 21st had confronted the mayor with this issue, did he

report to you what the mayor said to him?

A. Yes.

Q. What did he tell you the mayor said?

A. He said the mayor told him he had no interest in the commissioner of development position.

Q. Okay.

A. Something like that.

Q. When you heard that, how did you react to that?

A. I said surprising because it is not true. It didn't change what I was going to do or how I felt. I was surprised that he would tell him that but I will say this: We agreed at the beginning of the process to try to keep this as quiet as possible so I did not tell the mayor that I was going to talk to Councilmember Hyden. I told him who I was going to talk to but it surprised me that he would not tell him the truth. I don't know, you have to ask the mayor why he would say no to something that was obvious. He might tell you it is because Chuck never told me he was going to talk to Councilmember Hyden, but whatever, because my

STROME

understanding is when he talked to Councilmember Tarantino he did not say no because he knew I talked to Councilmember Tarantino but I don't want to dip into areas that are not of my knowledge but I was surprised. I mean in fairness I was surprised, but if you really want to know why he told Councilmember Hyden no you should ask the mayor that question.

Q. I was asking you about how you felt when hearing that.

A. Whether he expected him to ask him about it or not, I am surprised that he did not tell him he was interested or denied that he was interested in the position.

MR. MEISELS: Do you have any questions?

MR. BLUMENTHAL: I will ask an opinion question which I think I know what your answer is.

With your knowledge of the charter and the mayor, even though you brought it up originally, from your perspective, it not asking you about redress or punishment.

STROME

Did the mayor cross the line?

THE WITNESS: So I would say_-- I will answer it in two ways. I think he crossed the line. I don't think he knew he was crossing the line. I think he crossed the line much more with the second issue than the first issue based on what I heard. I wasn't involved in the conversation but, you know, I had come_-- I did not really give the mayor the opinion from the legal counsel on the charter issue, on the development commissioner job until I sent that memo.

So his opinion, I am sure he expressed to you and he expressed to me was he did not think it was a violation of the charter so it is hard for me to say he intentionally crossed the line because he did not agree it was a violation of the charter.

The second issue, that to me was a clear-- if the facts are what they intend to be that was a more

STROME

problematic issue because the council is not to get involved in specific personnel decisions. It is clear in the charter they shall not and it is clear that I as the city manager have the absolute right to name a deputy city manager at any time I want, whether I want one or don't want one, and gathering votes to talk about that or to ask me to rescind or whatever you want to say, to me, I think I said it in the memo, that speaks for itself, that was a clear violation but I would get an opinion from the legal counsel which is another opinion which I don't know if you have all seen but I did ask Mr. Toomey for a second opinion.

So if I can remember correctly, Councilman Tarantino sent me the request about both, not about the-- his e-mail was about the gathering of four votes, the deputy city management position.

I responded, I think it was pretty

STROME

clear that I felt that was not according to the charter but I am not a lawyer and I would get an opinion from a lawyer and we got an opinion from Mr. Toomey.

MR. BLUMENTHAL: The second question is something that is probably not as relevant and I just want to be clear about that.

We heard from a number of the City Councilmembers. It was unusual for you to announce that kind of position selection both of Adam and Kathleen in a memo notifying them in closed chambers.

THE WITNESS: That's correct that it was unusual. On the Adam one in particular. The reason I did that was because it would have been exceedingly uncomfortable to do that with the mayor's interest in the position, and some of the councilmembers I honestly believe had no idea that he had an interest. And I have to be honest, the

STROME

deputy city manager position, I didn't need to_-- that I didn't find unusual only because, you know, I did that before with the previous deputy manager, I just named the person. I didn't have a discussion. It is not like we go through a job interview process for a deputy city manager. I have never done that.

So the deputy city managers while I have been here are people that had other roles and I would be promoting them so it wasn't really an issue.

The fact is when I hire commissioners I usually update the council prior to the public announcement of the commissioners. It is kind of a funny thing about this whole thing. I thought there would be much more angst by the mayor of the development commissioner appointment.

When I announced Adam, even though I told him no, I just thought the deputy manager thing was routine. I

STROME

never went to them when I named her chief of staff, but if you really think about it is a very similar position. I just did it so I was surprised that that was creating discomfort on his part but he has to speak to why, so yes, it would have been unusual for me to hire a commissioner of development and not talk to them about it first but there were circumstances in this case that made that uncomfortable, and the deputy city manager position I was just throwing it in at the end to formalize what I believed was already in place.

Remember, I can show you them, for several years, probably five, every six months I write a letter to Kathleen saying that you are the acting city manager when I am not around, or if I become incapacitated you become the acting city manager, and in fact, every time I go on vacation or leave I send an e-mail to the city council saying I am not going to be around. While I am

STROME

away Kathleen will be the acting city manager.

So the idea that naming her deputy city manager was going to be surprising to anybody was weird.

MR. BLUMENTHAL: Thank you.

MR. PHIPPS: Sir, can I call you Charles?

THE WITNESS: I like Chuck.

MR. PHIPPS: What is interesting to me is that the mayor was interested in the position, however, he never applied for the position. Applying for the position is an act, is that correct?

THE WITNESS: Yes.

MR. PHIPPS: But he did not apply to the position so how could he have gotten it, you just would award it to him, is that common?

THE WITNESS: Not common but not never done before.

MR. PHIPPS: Okay.

THE WITNESS: For instance, I have

STROME

hired former colleagues city managers for positions here when they became open without having to go through an interview process because I knew them so I can understand him saying no to going through the application process. Why do you need to have a resume? You know me. I have worked with you for 23 years. Maybe that his motivation.

In fairness to him he wanted, you know, he didn't want what is happening now to happen and I did too. I didn't want this happening now too, to keep it as quiet as possible, and by the simple application I believe that becomes a public record so maybe that's what he was thinking. So that's really kind of a distinction without a difference.

He didn't formally apply but he clearly applied informally saying he wanted the job.

MR. PHIPPS: If you were to appoint him, the city would be in a fix because the part of the charter is you

STROME

have to review people. You knew him, he has never worked in that position, although as a mayor of the City of New Rochelle there is much development.

THE WITNESS: Correct.

MR. PHIPPS: So he cannot show you the 10 years of qualifications.

THE WITNESS: It would be hard to argue that if you went strictly by qualifications laid out in the city charter, which I have never gone strictly by, they are sort of a guideline but it would be hard to argue that he met any of the qualifications.

MR. PHIPPS: Okay.

THE WITNESS: For the position, but I don't believe, maybe I am wrong but I don't believe that that automatically disqualifies everybody.

I hired former city managers as public works commissioner. I now have one in the human resources department. I just hired that person because_-- but in those cases if you are a manager you

STROME

are sort of involved in everything and I guess you can make the argument that the mayor is involved, certainly is involved in development.

Developers for right or wrong, go to the mayors of communities first. Whether they are a strong mayor or city manager, they go. They want to talk to the mayors, so I can't say he has had no experience in development, but if you go strictly by the 10 years of planning and this, then you have a hard argument to make.

MR. PHIPPS: I have the trouble with not wanting to apply. It is a hot button issue and you are not one to speak to meet not all, at least some of the qualifications to apply.

THE WITNESS: Well, you know, formally apply, why he didn't want to, I am only guessing. So that's something you have to ask him if you really need to know why. He didn't want to take part.

STROME

All I know is, I said maybe you should get your resume in as we go through this process because I did suspect, and you saw in the ethics opinion that I got from ICMA, it did say that the hire, whoever it is, should be after a thorough review process based on the qualifications and experience of the candidate, and if you don't participate in the process, then it is hard to say you followed the ethics code by hiring somebody outside of that process.

In those other cases where I hired managers, I knew everybody. Do I think I could have done it? Yes, but without the qualifications it is very hard.

MR. PHIPPS: From what little I know--

THE WITNESS: I know where you are going with that, I think. The fact that he was still in the office of the mayor_--

MR. PHIPPS: Yes.

STROME

THE WITNESS: -- makes it first optically very difficult. You know, if he had resigned as mayor or had not run and was a year or two out then that's a whole different story, but to do it while someone is in the position of May mayor what made this whole thing complicated and difficult.

MR. PHIPPS: That's the charter also.

THE WITNESS: Yes. Listen, I kick myself every time I think back and say maybe you should apply. It was probably a dumb thing to say but it was said so I can't dispute that I said it.

MR. BLUMENTHAL: When the most recent foray with the recruitment firm for your job, the mayor seemed to have inserted comments about adding not-for-profit in that search document. Is that something from your perspective would be really unusual, partially unusual or normal?

THE WITNESS: Well, I would say it

STROME

is unusual because I don't think there is any not-for-profit, a not-for-profit running the government.

Now, what I have said offhanded to a few of the council people it might be difficult to find a manager only because of the timing. Next year is an election year and the whole city council is running for election so if I were applying for a job and seven people hired me and they may all be gone the next year I would be hesitant so, you know, there are ways around that. You can name an interim person and the next council can hire him.

I haven't been through this before. My profession is pretty standard in what the qualifications are and we are the largest city in the State of New York with a council manager form of government so I don't really get why we would be adding not-for-profit experience to the qualifications required.

STROME

I wasn't in the executive session when he made that suggestion or when he talked to the recruitment firm. This one hire, the city manager is the city council's hire so I would say it is unusual. I was surprised.

MR. MEISELS: I have one thing I want to clarify.

Q. Earlier you referred to a first issue and a second issue. Am I correct what you mean by the second issue is the issue relating to your appointment of the deputy city manager?

A. Yes. I don't mean to confuse you but that-- how do I say this? That whole circumstance, if it is as has been reported to me is odd and is a clearer charter issue than the other one.

You can argue I initiated, at least in the beginning, the development thing and I think as I said the first time, it gets tricky and it changes when I said no and then it continued. What happened up to that point was my initiation but I did try to end it early and it kept going.

STROME

The second thing was a different type of thing.

MR. BLUMENTHAL: In terms of redress, I am not saying we are going to find the mayor-- I will use the words stepped over the line. In either or both of the cases, what is the redress?

THE WITNESS: As I understand it, a violation of the city charter would be a misdemeanor of some kind. I imagine as the advisory, ethics advisory board you would make a report to me and possibly to the City Council, and if it is for a violation of that kind there is nothing I am going to do about it. I would refer it to the District Attorney. I imagine I would send it to the Assistant District Attorney.

If it came to me I would send it to the council and to the District Attorney because misdemeanors are a criminal offense. There is no redress

for me. There is nothing I can do. I don't think there is anything the council can do.

MR. BLUMENTHAL: In our opinion if we should go that route can we make a suggestion as to what we think the redress should be or is that something that is outside our purview?

THE WITNESS: If it were me I would say you guys are doing what you are doing and you should be able to say whatever you want to say but I think you should defer to your legal counsel on whether you can do that.

MR. BLUMENTHAL: For your decades of being in the industry and have spoken to other city managers where this type of thing may have come up_--

THE WITNESS: I never have. I will tell you when I talk to the managers I told the mayor that I would talk to a few elected officials, a few managers and a few developers and the managers were ready to slap me in the

STROME

face for even considering it so nobody that I know of has been_-- you know, the tenet that most concerns me, I am a tenet of the ethics code, I shall not participate in any political activities while I am in service.

This is on the borderline there. They didn't cite that one but I don't think anybody has had this experience.

MR. BLUMENTHAL: Thank you.

MR. PHIPPS: This is something that is_--

MR. BLUMENTHAL: Groundbreaking.

THE WITNESS: I think it is all circumstantial about_-- I don't mean circumstantial in the legal term, I mean circumstances are what they are. It is different because of the people that are here, the time that they have been here and I find it all very unfortunate and disheartening but, you know_--

MR. PHIPPS: Question. Because we are in the fix we are in and as you

STROME

stated the environment that we are in, your intention is to retire at the end of the year?

THE WITNESS: More so now than ever.

MR. PHIPPS: Well, I would like to know if the council were to ask you to stay for another six months, would you consider it?

THE WITNESS: Probably not. You know, they would have to give me a really good reason to do that.

MR. PHIPPS: We can motivate you.

THE WITNESS: I am inclined not to do that. There actually is an option in my contract. I am already retired, quote unquote retired. There is an option in my contract for another year but I had decided before all of this that this was it for me and, you know, I honestly think that whoever the next person is doesn't need me hanging around. I have been here long enough. It should be a clean break and the

STROME

person should come in.

MR. PHIPPS: If they were to ask you for another six months, that is with you in charge.

THE WITNESS: Yes, I understand but it doesn't really do much for the circumstances because then you are just getting closer to the hiring of a manager when the people that are hiring him are only going to be, him or her are going to be there for only six months. So the issue is really, you know, does this council or the next council hire the next manager?

My opinion, it is up to this council. I am leaving during their term. It is their obligation to hire somebody. They have a number of options. I have no idea who is going to run again, who is not going to run again so I am pointing out the possible difficulty in attracting good candidates because of the timing but this isn't going to help either.

STROME

MR. PHIPPS: This definitely isn't going to help.

MR. BLUMENTHAL: All I can say is thank you.

THE WITNESS: Thank you. I am sorry you have to deal with this. Those financial forms look a lot better than this stuff.

MR. BLUMENTHAL: We still haven't done them for this year.

(Off the record.)

MR. MEISELS: Thank you very much.

MR. PHIPPS: Thank you, sir, for your time. I appreciate it.

(Witness excused.)

K A T H L E E N G I L L, a witness called on behalf of the City of New Rochelle, having been first duly sworn, was examined and testified as follows:

THE COURT REPORTER: Can I have your name and address for the record.

THE WITNESS: Kathleen Gill, 515 North Avenue, New Rochelle, New York, 10801.

STROME

EXAMINATION BY

MR. MEISELS:

Q. One of the questions is this: There has been testimony about a meeting that you and the mayor and the city manager had together from which you were excused.

A. Yes.

Q. Do you remember that meeting?

A. Yes.

Q. Could you tell us what happened?

A. Yes. The meeting was in the mayor's office and we were discussing this possibility of Chuck appointing the mayor to the position of commissioner of development, and at that point I had done a little bit of research. [redacted] I was also concerned that there might be a violation of the Chuck's professional ethics and I was very concerned about the optics of it in the greater community. So I expressed all of those concerns and I said I would like to step out of the meeting. If this isn't going to end here I really don't want to participate in it any further and I was excused from the meeting.

STROME

MR. BLUMENTHAL: Who heard your concerns?

THE WITNESS: The mayor and the city manager.

MR. BLUMENTHAL: Was there any response by either of them?

THE WITNESS: The city manager expressed similar concern. He was very uncomfortable about his professional ethics. He also was concerned about the charter, the language of the charter.

MR. PHIPPS: That was expressed at that meeting?

THE WITNESS: Yes.

MR. PHIPPS: By the city manager?

THE WITNESS: I believe that he was agreeing with my concerns.

MR. PHIPPS: I am sorry.

MR. BLUMENTHAL: No, it okay.

THE WITNESS: [redacted].

After the meeting the city manager asked me to talk to the outside

STROME

attorney, Vince Toomey, and have him really look at this issue and research it.

MR. PHIPPS: And your feelings now?

THE WITNESS: With respect to?

MR. PHIPPS: The charter.

THE WITNESS: [redacted]

MR. BLUMENTHAL: Were there many cases in this term in your present role where you expressed, where you deemed to be a legal opinion where the legal opinion was not necessarily heated? Nothing about the mayor, city council,

STROME

any other_--

THE WITNESS: I understand. None come to mind.

MR. BLUMENTHAL: Thank you.

Q. We understand that there was a time that you and the city manager and the mayor had lunch to discuss the mayor's possible appointment to the position of commissioner.

A. Yes.

Q. Do you recall that?

A. Yes.

Q. Do you recall who said what to whom in substance during that lunch?

A. Yes. That was prior to the meeting in the mayor's office and the purpose of the meeting was to go off-site and have a conversation about whether this was something that the city manager could really consider.

The city manager, I believe, raised concerns about optics, either he raised them or I did. We were both saying that we were very concerned about how it would look. I am not sure if at that point we were talking about the charter, I am not sure but it was certainly

STROME

concern about how it would look.

The city manager was concerned that it would look like in the last year of his_-- that he was sort of giving the mayor something and that there might have been a quid pro quo and he was very concerned about how it would look to the greater community but also to his peers, fellow city managers, the concern being that hiring a political person into a professional administration.

MR. BLUMENTHAL: I want to thank you for all you have done for the city, the amazing work that you have done and thank you very much.

THE WITNESS: Thank you.

Q. I just have one more. Let's assume that there has been testimony that the mayor attempted to get four people to go to visit the city manager and express displeasure with your appointment as deputy city manager. Do you know why the mayor was displeased with that?

A. So I don't know with any certainty. I haven't discussed it with the mayor. I believe it is because I gave a legal opinion that

STROME

probably influenced the city manager's decision not to appoint him.

MR. MEISELS: I don't have any other questions. You gentlemen?

MR. BLUMENTHAL: Sorry for making you come in.

(Time noted: 5:45 p.m.)

INDEX

INDEX

EXAMINATION OF C. STROME 3

EXAMINATION BY MS. GILL 52

CERTIFICATION

STATE OF NEW YORK)
) ss.
COUNTY OF WESTCHESTER)

I, HOWARD BRESHIN, a Court Reporter and Notary Public within and for the State of New York, do hereby certify:

That I reported the proceedings that are hereinbefore set forth, and that such transcript is a true and accurate record of said proceedings.

I further certify that I am not related to any of the parties to this action by blood or marriage, and that I am in no way interested in the outcome of this matter.

IN WITNESS WHEREOF, I have hereunto set my hand.

HOWARD BRESHIN,
COURT REPORTER

ERRATA SHEET

VERITEXT/NEW YORK REPORTING, LLC

CASE NAME: Board Of Ethics Meeting v.
DATE OF DEPOSITION: 4/12/2022
WITNESSES' NAME: CHARLES STROME

PAGE	LINE (S)	CHANGE	REASON

_____
CHARLES STROME

SUBSCRIBED AND SWORN TO BEFORE ME
THIS ____ DAY OF _____, 20__.

_____ _____
(NOTARY PUBLIC) MY COMMISSION EXPIRES:

&

& 2:3

1

10 41:8 42:12
10604 2:5
10801 1:6 3:10 52:25
1133 2:4
12 1:7

2

20 61:22
2020 27:23
2022 1:7 26:25
21 27:24,25 28:12
21st 30:7 31:24
22 28:12
23 40:9
24695 60:20

3

3 59:2
391-3690 2:6

4

4/12/2022 61:3
4:40 1:7

5

515 1:6 3:8 52:23
52 59:3
5:45 58:8

7

70 26:6

9

914 2:6

a

aback 5:3
able 48:12
absolute 35:7
accept 10:20
accepted 13:25
accurate 28:24 60:11
act 39:15
acting 38:19,22 39:2
action 60:14
actions 25:2
activities 49:6
adam 12:6 14:5 36:14,18 37:23
adding 44:20 45:23
address 3:7 52:22
administration 57:11
advice 17:14
advised 7:25 15:13
advisory 47:13,14
ago 21:20 26:19 29:8
agree 8:17,17 21:7 34:21
agreed 8:3 32:15
agreeing 54:19
ahead 25:7
allegations 8:22
alleged 4:4
amazing 57:14
angst 37:21
announce 36:13
announced 37:23
announcement 37:18
annoyed 8:20
answer 16:5,7,13 33:20 34:4
anybody 7:22 39:6 49:10
anymore 11:11 19:9
anyway 5:6 6:25 19:21
apologize 27:25
apparently 8:17
appear 3:21
appeared 18:13
applicant 9:9
applicants 26:2,3 26:5
application 11:23 17:16 40:7,16
applied 12:7 39:14 40:21
apply 9:11 10:7 17:20 39:18 40:20 42:16,19,21 44:14
applying 16:16 22:2 39:14 45:11
appoint 20:25 23:2,4 40:24 58:3
appointed 4:20 12:6 17:3 20:19 20:22
appointing 53:14
appointment 4:5 5:13 6:10,23 7:18 8:4,23 31:22 37:22 46:13 55:13 56:8 57:21
appointments 7:14
appreciate 52:15
appropriate 11:21 15:8
approximately 9:17
april 1:7
areas 33:5
argue 41:10,14 46:19
argument 42:3,14
asked 11:18 12:12 15:3,9,16 17:8,13 21:16,17 22:4 25:17,22 28:16 54:25
asking 33:10,24 55:10,16
aspect 7:19
assistant 47:20
assume 57:17
assumed 15:22
assuming 24:16
assumption 4:17 20:24
attempt 6:19
attempted 57:19
attention 9:2 27:22
attorney 15:4,5 47:19,21,24 55:2
attorneys 2:4
attracting 51:23
automatically 41:20
avenue 1:6 2:4 3:9 52:24
award 39:20

b

back 10:10,11 11:18 21:19 24:21 31:24 44:13
based 25:14,24 27:7 34:8 43:9
bases 31:18
basically 18:10 29:7
began 14:6

beginning 9:11 10:18 23:12 32:16 46:20
begins 9:7
behalf 3:3 52:18
belief 7:9
believe 11:17 14:19 19:7 22:6 29:19 36:24 40:16 41:18,19 54:18 56:20 57:24
believed 22:19 38:15
best 11:4 12:22 26:11 30:4
better 15:4 30:13 52:8
bit 53:16
blanks 3:25
blood 60:15
blumenthal 2:9 19:22,25 21:19 24:13 25:6 33:18 36:7 39:7 44:17 47:4 48:5,16 49:11,14 52:4,10 54:2,6,21 55:20 56:5 57:12 58:6
board 1:2 47:14 61:2
borderline 49:8
bothered 30:3
break 50:25
breshin 1:10 60:6 60:21
bring 12:2 18:12
broach 31:15,16
brought 27:16 28:14 33:22
button 42:17
buying 24:5

c

c 2:2 3:2 59:2
calendar 18:14
call 5:13 18:16,25 39:8
called 3:2 5:19 52:17
calls 5:18
candidate 12:22 26:12 43:10
candidates 11:21 12:3 51:24
captioned 1:9
care 7:18
career 15:15,17,19 15:23 16:2,4
case 38:11 61:2
cases 41:25 43:15 47:8 55:21
cast 29:10
caused 24:14
caveat 25:22
certainly 29:12 42:4 56:25
certainty 57:23
certification 60:1
certify 60:8,13
chambers 36:16
change 4:11 32:13 61:5
changes 46:22
characterize 22:19
charge 51:5
charles 1:9 2:8 3:8 39:9 61:3,21
charter 7:13 11:10 11:14 13:21 19:7 20:2,14,16 21:10 21:18 33:21 34:13 34:19,22 35:5 36:3 40:25 41:12 44:10 46:17 47:11 53:18 54:12,13,23 55:8,19 56:25
chief 5:3 38:3
christmas 24:6 28:8
chuck 32:23 39:10 53:14
chuck's 53:19
circumstance 7:5 46:16
circumstances 29:9 38:11 49:18 51:8
circumstantial 49:16,17
cite 49:9
cited 20:13
city 1:2 3:3 4:6,10 4:18,25 5:2,4,14 6:9 7:10,15,21 8:4 16:17 20:17,19,20 20:24 21:3 35:6,8 35:23 36:11 37:2 37:9,11 38:13,19 38:22,24 39:2,5 40:2,24 41:4,11,21 42:8 45:9,20 46:5 46:5,13 47:11,15 48:18 52:18 53:6 54:5,8,17,24 55:11 55:16,25 56:7,18 56:20 57:3,9,13,20 57:21 58:2
clarify 46:9
clean 50:25
clear 7:14 9:4 13:6 15:20 24:12,17 29:20 34:24 35:4 35:6,14 36:2,10
clearer 46:17
clearly 40:21
closed 36:15
closely 15:6
closer 51:9
code 43:13 49:5
colleagues 40:2
come 5:24 6:18 7:2 7:4,22 8:18 15:11 17:25 18:11 26:11 28:3 34:11 48:19 51:2 56:4 58:7
comfortable 11:14 11:16 19:19 24:10
coming 17:24 22:8 24:21
comment 10:6
comments 44:20
commission 61:25
commissioner 4:21,21,22,23 8:24 9:9 14:5,8 16:21 17:4,17 18:15 20:23 25:10 32:6 34:14 37:22 38:9 41:22 53:15 56:9
commissioners 12:16,19,20 37:16 37:18
committee 2:4,8,9
common 39:21,22
communities 42:7
community 53:21 57:8
complaint 1:4 4:4
complicated 44:9
concern 6:16,22 7:23 20:15 54:9 57:2,9
concerned 6:8,14 53:17,18,20 54:11

55:19 56:23 57:3 57:7
concerning 4:4 5:13
concerns 5:16,23 5:24 10:24 11:15 11:15 15:2 19:8 19:20 20:2 21:10 49:4 53:22 54:3 54:19 56:21
conduct 25:9
conducted 26:22
conference 5:13
conflict 12:13
confronted 30:6 31:25
confuse 46:14
consider 11:5 30:22 50:10 56:19
consideration 11:22
considering 49:2
consult 27:11
consulted 27:9,10
contact 15:3
context 18:23 20:6
continued 22:20 28:22 29:2,20 30:2 46:23
contract 50:17,19
conversation 9:7 9:18 11:25 13:23 19:6 26:20 27:5 29:21,24 34:10 56:17
conversations 21:9 30:15,17 31:20
copy 12:12
corp 19:3
corporation 14:10 14:12,24 17:2,9
correct 9:5,12,13 9:16 14:14,17 18:21 25:16 27:3 30:16,25 36:17 39:16 41:6 46:11
correctly 35:19
council 5:22 6:12 6:16,24 7:10 14:11,12,24 17:2,9 20:17,19 23:11,14 35:2 37:17 38:24 45:6,10,16,21 47:15,23 48:4 50:8 51:14,15,17 55:25
council's 46:6
councilman 27:8 29:3 30:5,16,17 31:23 35:20
councilmember 5:19,19,20,20 23:15,16,17,19 24:3 25:19,21 27:11,12,14,15 32:18,25 33:2,4,8
councilmembers 36:12,23
councilpeople 27:8
councilperson 5:11 7:25
councilpersons 8:2
counsel 14:23 15:10 19:3 34:12 35:15 48:14
counsellable 23:16
county 60:5
couple 4:7 24:4 26:21 29:7
course 4:17 9:3 29:13
court 3:6 52:21 60:6,22
cover 31:18
cox 1:4
creating 38:6
criminal 47:25
cross 34:2
crossed 34:5,7,20
crossing 34:6
customers 27:20
cut 12:24 19:22
cutting 10:23

d

date 61:3
david 2:9
dawn 2:10
day 22:9 61:22
days 11:17
deadline 16:6
deal 52:7
dealt 4:18
decades 48:16
december 27:22 28:7
decided 8:17 12:23 50:20
decision 13:12 19:21 22:9,23 24:2,3 58:2
decisions 35:4
declining 31:21
deduce 20:21
deduced 6:5
deemed 55:22
defer 48:14
definitely 52:2
delivered 9:19
demand 16:22
demanded 16:10
demanding 13:11 13:12
democrat 27:13
denied 33:14
department 2:10 41:23
deposition 61:3
deputy 4:6,18,25 5:2,4,14 6:9 8:4 14:4 35:7,23 37:2 37:5,9,11,25 38:13 39:4 46:13 57:21
describe 30:4
described 29:18 30:15 55:14
desire 17:3
developers 42:6 48:24
development 4:21 9:10 12:16,17 14:7,8 16:21 17:17 18:15 25:11 32:6 34:13 37:22 38:9 41:5 42:5,11 46:20 53:15
dicker 2:3
difference 18:5 40:19
different 44:6 47:2 49:19
difficult 13:5 44:3 44:9 45:7
difficulty 51:23
dip 33:5
direct 29:11
direction 10:22 15:20

disagreed 21:13
discomfort 19:18 28:19 38:6
discretion 7:15
discuss 14:13 17:2 17:23 18:14 56:8
discussed 28:4 57:24
discussing 53:13
discussion 8:15 10:15 14:16 19:9 37:7
discussions 11:9 17:11
disheartening 49:22
disjointed 3:22
dismissed 20:15
dispersions 29:11
displeased 57:22
displeasure 57:20
dispute 44:16
disqualifies 41:20
distinction 40:19
district 47:19,20 47:23
document 44:21
doing 11:14,16 48:11,12
drawing 27:22
duly 3:4 52:19
dumb 44:15
dynamic 6:21 8:6

e

e 2:2,2 3:2,2 35:22 38:24 52:17,17
earlier 46:10
early 46:24
economic 9:10 25:11
edelman 2:3
effort 4:4
efforts 25:14 28:22
eight 21:20 31:21
either 47:7 51:25 54:7 56:21
elected 20:25 31:17 48:23
election 16:9 45:9 45:10
elser 2:3
employers 21:25 21:25
employment 6:6
encouraged 16:17
ends 9:13
engage 12:10
engaged 12:9
entertain 8:14
entertained 8:16
environment 50:2
equation 24:21
errata 61:1
esq 2:5,10
essentially 5:5
ethics 1:2,4 2:4,8,9 11:15 13:2,22 43:5,13 47:13 49:5 53:19 54:11 61:2
events 7:19 13:13
everybody 41:20 43:16
exact 5:7
examination 1:9 3:11 53:2 59:2,3
examined 3:4 52:19
exceedingly 36:20
excused 19:3 52:16 53:7,25
executive 46:2
existence 5:7
expected 33:12
experience 42:11 43:10 45:24 49:10
expires 61:25
explain 21:24
express 5:16 6:13 7:23 25:25 29:3 57:20
expressed 10:24 23:9,10 24:7 34:17,17 53:21 54:9,14 55:22
extent 3:17

f

face 49:2
fact 6:4 16:8 22:10 22:19 30:2 37:15 38:22 43:22
facts 9:2 34:24
fair 15:8,18 26:17 26:20 30:14
fairness 25:19 33:7 40:11
fall 17:21
far 55:18
february 26:24
feel 21:21,22 22:12 23:22 25:5 30:3 30:10
feeling 19:13 29:8 31:9
feelings 27:13 55:5
feels 29:14
fellow 57:9
felt 6:25 13:8 15:4 22:21,25 23:3,5,6 24:8 29:4,16,23 30:11,11 31:5,8 32:14 33:10 36:2
figured 10:9
fill 25:10
filling 3:24
finalist 16:18
finalists 12:18 26:4,8
finance 4:22
financial 52:8
find 37:3 45:7 47:6 49:21
finding 9:8
firm 12:9,10 17:18 25:12 44:18 46:4
first 3:4,14 12:7 21:4 24:3 30:19 34:8 38:10 42:7 44:2 46:10,21 52:19
five 26:18 38:17
fix 40:24 49:25
folks 13:3 23:25
followed 43:12
follows 3:5 52:20
foray 44:18
form 45:22
formal 11:25 17:7 17:22 18:4,8,16,19 30:19
formalize 38:14
formalizing 5:6
formally 40:20 42:21
former 40:2 41:21
forms 52:8
forth 60:10
four 4:23 5:18,21 7:22 8:18 35:22 57:19

fourth 8:11
free 6:17
frequently 20:3
fried 5:19 8:3,9
frustrated 10:8
fully 54:23
funny 37:19
further 14:21 19:6 53:25 55:15,18 60:13

g

g 52:17
gallery 27:18 28:4
gather 8:13
gathering 6:5 35:10,22
gauge 30:21
gentlemen 58:5
getting 7:3 28:8 51:9
gift 28:8
gill 1:9 4:6 10:23 52:23 59:3
give 10:13 34:11 50:12
giving 24:10 57:5
go 8:19 9:25 10:2 10:2 15:21 18:11 21:19 37:8 38:23 40:4 42:6,9,12 43:3 48:6 56:17 57:19
going 3:23 5:24 6:24 7:3 8:18 10:22 12:2 16:16 17:21 18:2 19:21 21:14 22:10,24,25 23:3,13 28:16 30:8 31:3,15,16 32:13,18,19,24 38:25 39:5 40:7 43:22 46:25 47:5 47:17 51:11,12,20 51:21,25 52:3 53:23
good 10:8,9 14:17 14:21 30:11,12 50:13 51:23
gotten 39:20
government 45:4 45:22
great 10:4
greater 53:21 57:8
groundbreaking 49:14
group 6:18
guess 15:22 42:3
guessing 42:22
guideline 41:14
guys 48:11

h

h 3:2 52:17
hand 5:25 8:12,14 60:18
hanging 50:23
hanratty 5:12
happen 12:17 40:13
happened 10:3 17:11 26:20 46:23 53:11
happening 40:12 40:14
happy 22:22
hard 9:8 21:23 34:19 41:9,14 42:13 43:12,18
heard 3:15 8:5,6,6 8:13,20 32:10 34:9 36:11 54:2
hearing 20:8 33:11
heart 16:22
heated 55:24
held 1:9
help 12:10 51:25 52:3
herbert 5:12,21 8:2
hereinbefore 60:10
hereunto 60:17
hesitant 45:13
high 10:16 12:20
higher 4:24
hinder 4:14
hindering 15:19 15:23 16:2
hire 4:15 24:20 37:15 38:9 43:7 45:16 46:5,6 51:15,18
hired 12:16 25:12 40:2 41:21,24 43:15 45:12
hiring 11:5 43:13 51:9,10 57:10
history 6:15
honest 36:25
honestly 7:6 36:23 50:22
hoopla 14:6
hot 42:16
howard 1:10 60:6 60:21
human 4:20 41:23
hyden 23:18 24:4 27:8,15 29:4 30:6 30:16 31:23 32:18 32:25 33:8

i

icma 43:6
idea 14:17,21 30:12 36:24 39:4 51:20
ignored 20:6
imagine 47:13,19
immediate 21:6
implications 11:10
important 11:4
incapacitated 38:21
inclined 50:15
included 26:9
index 59:1,2
indicate 14:20
indicated 16:8
indirect 29:12
individually 6:17
industry 48:17
inflicting 28:19
influenced 58:2
inform 7:11
informal 18:5,22 30:23
informally 17:12 40:21
information 6:2 12:18 25:23
informational 16:23
informed 5:10
inherent 22:7 24:25
initial 9:18 27:5 31:21
initially 31:14
initiated 15:12 46:19
initiation 46:24

initiative 28:18
input 7:11,12
inquiry 55:16,18
inserted 44:20
instance 7:16 39:25
intend 29:15 34:25
intent 27:10
intention 50:3
intentionally 34:20
interest 13:8 32:6 36:22,25
interested 10:13 12:17 13:13,14 22:11 33:14,15 39:12 60:16
interesting 39:11
interim 45:15
internal 12:6
internally 31:7
interview 37:8 40:5
interviews 26:22
investigation 9:3 20:9
involved 11:9,11 19:6,9 34:9 35:3 42:2,4,5
issue 20:11 28:4 31:25 34:8,8,13,23 35:2 37:14 42:17 46:10,11,12,12,17 51:13 54:23 55:3
issues 31:2

j

january 28:9,12 30:6 31:24
job 10:9 11:5 13:11 17:17 22:2 22:3 24:9 34:14 37:8 40:22 44:19 45:11
jobs 17:20
join 5:15

k

k 52:17
kathleen 1:9 4:6 10:23 11:7,8 19:25 21:7,9,17 36:14 38:18 39:2 52:23
kathleen's 14:19
kaye 5:20 8:3
keep 22:24 32:16 40:14
kept 17:23 46:25
kick 44:12
kicking 10:19
kind 5:6 6:20 10:19 36:13 37:19 40:18 47:12,17
knew 13:6 33:3 34:6 40:5 41:2 43:16
know 3:18 4:13,19 6:4 7:3 9:6 13:11 13:15 14:22 15:24 19:20 20:18 21:5 22:18 24:15,18 25:4 30:25 31:19 32:21 33:8,19 34:10 35:17 37:4 40:9,12 42:20,24 43:2,20,21 44:3 45:14 49:3,3,23 50:8,12,21 51:14 57:21,23
knowledge 33:6 33:21
knows 29:14

l

l 3:2 52:17,17,17
laid 41:11
language 20:13 54:12
large 3:17
largest 45:20
law 2:10
lawyer 36:4,5
leaning 10:22
learn 7:24 30:5
leave 38:23
leaving 51:17
legal 20:4 21:15 34:12 35:15 48:14 49:17 55:23,23 57:25
legality 14:25
letter 38:18
level 10:16 12:20
life 23:4
line 34:2,5,6,7,20 47:7 61:5
list 26:7
listen 44:12
little 4:19 5:3 6:19 8:19 9:23 10:11 27:4 43:19 53:16
liz 8:3,9,14
llc 61:1
llp 2:3
long 11:13 12:4 17:18 50:24
look 52:8 55:3 56:23 57:2,4,8
lopez 5:12,20 7:25 23:16 27:12
lot 3:16 8:5 13:17 52:8
lunch 10:23 14:11 14:13,18 17:5,8 18:7,15 19:10 23:19,23 30:20 31:12,13,18 56:8 56:14

m

m 3:2
mail 35:22 38:24
making 7:18 23:21 58:6
malicious 17:19
management 4:14 4:24 21:2 35:23
manager 4:6,10,14 4:16,18,25 5:4,14 6:9 7:10,15,21 8:4 14:4 20:20,25 21:4 35:6,8 37:2,6 37:9,25 38:13,20 38:22 39:3,5 41:25 42:9 45:7 45:22 46:5,13 51:10,15 53:6 54:5,8,17,24 55:11 55:17 56:7,18,20 57:3,20,21
manager's 58:2
managers 5:2 37:11 40:2 41:21 43:16 48:18,22,24 48:25 57:9
marriage 60:15
martha 5:11 7:25 8:10,14
matter 1:9 6:23 7:6,8 15:5 19:19 26:8 60:16
matters 7:9
mayor 4:8 5:11,17 7:25 9:15 10:24 11:7,13 12:14,15 14:11,13 15:7,12

16:25 17:24 19:12 20:9,18 23:12 24:16 25:17 28:21 28:22,25 29:10 30:6 31:14,16,19 31:25 32:2,4,5,17 32:21 33:9,22 34:2,11 37:21 39:12 41:4 42:4,8 43:24 44:4,8,19 47:6 48:22 53:6 53:14 54:4 55:10 55:16,25 56:7 57:5,18,22,24
mayor's 36:22 53:12 56:8,16
mayors 6:24 12:17 42:7,10
mean 20:5,7 26:10 26:23 33:6 46:11 46:14 49:16,18
meaning 30:24
means 21:16
meant 25:3
meet 17:24 42:18
meeting 11:6,6 15:12 16:25 17:6 17:7 18:8,9,13,14 18:16,19,24 19:3 53:5,9,12,23,25 54:15,24 56:15,16 61:2
meetings 17:9,23 18:2,4,5
meisels 2:5 3:12 19:24 25:8 33:16 46:8 52:13 53:3 58:4
member 2:8,9 6:16 20:17,18
members 23:13
memo 5:5 9:14,14 9:19 12:23 13:18 13:20,24 14:2,4 26:15,18 34:15 35:13 36:15
memory 9:21
mention 17:12
mentioned 14:9 19:2,7 21:8,11 24:6
met 41:15
miffed 6:19
mind 25:4 56:4
minutes 21:20 29:8
misdemeanor 47:12
misdemeanors 47:24
miserable 23:4
mistake 3:14
moment 15:17
moments 13:17
months 4:23 31:21 38:18 50:9 51:4 51:13
morning 6:7 8:20
moskowitz 2:3
motivate 50:14
motivation 40:10
mutual 28:15

n

n 2:2 52:17
name 3:7 35:7 45:15 52:22 61:2 61:3
named 37:6 38:2
naming 39:4
narrowed 12:11
nature 13:13 22:5
necessarily 55:24
need 6:25 16:4,13 37:3 40:8 42:24 50:23
needed 6:11 16:7
never 6:15,20,25 7:5,20 8:5,9,18 13:23,25 16:6 18:13 22:25 23:3 24:20 32:24 37:10 38:2 39:13,23 41:3,12 48:20
nevertheless 28:22
new 1:2,6,10 2:5 2:10 3:3,9,9 4:10 4:14,15 41:4 45:21 52:18,24,24 60:3,7 61:1
normal 44:24
north 1:6 3:9 52:24
notary 1:10 60:7 61:25
noted 58:8
notifying 36:15
number 26:5 36:11 51:19
ny 1:6

o

o 3:2
obligation 51:18
obvious 12:22 26:11 32:23
obviously 4:18 26:9
occasion 31:11
occasionally 17:25 30:20
occasions 28:17
occur 26:14
occurred 26:14,24
odd 46:17
offense 47:25
offer 14:24 20:3
offhanded 10:6 45:5
office 11:18 18:11 18:12 20:21 22:8 43:23 53:13 56:16
official 21:2
officials 31:17 48:23
okay 3:20 4:2 8:24 9:24 10:5,13 16:14 19:12,16 25:8 26:17 27:7 27:23 28:11,14 30:10,14 31:11,23 32:8 39:24 41:16 54:21
once 17:24 28:25
ones 8:7
open 40:4
opinion 6:13 13:2 13:22 14:23,24 15:5,9,10 20:4,13 21:15,18 25:25 29:25 33:19 34:12 34:16 35:15,16,18 36:4,5 43:6 48:5 51:16 55:23,24 57:25
opinions 13:21,22 13:24
opposed 5:15
optically 44:3
optics 10:25 11:3 53:20 56:21
option 50:16,19

options 51:20
ordered 28:8
organization 13:3
original 23:23
originally 22:21 29:21 33:23
outcome 60:16
outside 14:23 15:3 15:5,10 16:17 43:13 48:9 54:25
outward 13:7
overt 24:18

p

p 2:2,2
p.m. 1:7 58:8
page 61:5
part 11:22 20:8 24:20 38:7 40:25 42:25
partially 44:23
participant 12:7
participate 43:11 49:6 53:24
participating 24:24
particular 17:10 36:19
parties 60:14
passed 27:14
peers 57:9
people 3:15 5:18 5:21 6:12,24 8:7 10:16 17:20 23:9 23:11 30:12 37:12 41:2 45:6,12 49:19 51:10 57:19
person 5:22 11:4 12:5,6 22:23 37:6 41:24 45:15 50:23 51:2 57:10
personnel 6:23 7:9 35:4
perspective 14:19 33:24 44:22
peter 2:5 19:22
phipps 2:8 39:8,11 39:18,24 40:23 41:7,16 42:15 43:19,25 44:10 49:12,24 50:7,14 51:3 52:2,14 54:14,17,20 55:5,8
pivotal 15:17
place 1:10 4:15 21:4 38:15
plains 2:5
planning 42:13
please 9:5 24:23
plow 25:6
point 10:21 14:10 46:23 53:15 54:22 55:11 56:24
pointing 51:22
police 12:19
political 49:6 57:10
position 4:19 8:3 13:17 14:8 15:9 15:13,21,25 16:17 16:20 17:3,14 18:14 20:23 21:2 21:13 22:14 23:7 25:10 29:9 32:7 33:15 35:24 36:13 36:22 37:2 38:4 38:13 39:13,14,15 39:19 41:3,17 44:7 53:14 56:9
positions 4:23 40:3
possibility 53:13
possible 32:17 40:15 51:22 56:8
possibly 47:15
practical 9:6
preplanned 18:19
present 2:8 55:21
pressure 13:7,8 21:21,22 22:7,22 23:6 24:8 25:2 29:8,11,12,13 30:3 31:8
pressured 22:13 24:17
pretty 30:11 35:25 45:18
previous 37:5
prior 20:7 26:21 31:13,19 37:17 56:15
pro 57:7
proactively 27:16
probably 3:13 18:7 23:8,10,24 26:18,24 28:15 36:8 38:17 44:15 50:11 58:2
problem 14:2
problematic 35:2 55:18
proceed 11:2
proceeded 22:20
proceedings 60:9 60:12
process 10:20 11:23 12:4,9 17:16 24:24,25 32:16 37:9 40:5,7 43:4,9,11,14
profession 45:18
professional 13:3 53:19 54:10 57:11
profit 44:21 45:3,3 45:24
promoting 37:13
prospective 14:19
provided 11:21 25:20,21 26:4
public 1:10 37:17 40:17 41:22 60:7 61:25
punishment 33:25
purpose 14:18 56:16
pursue 14:21
purview 48:9
put 13:7 15:8,23 29:19

q

qualifications 41:8 41:11,15 42:19 43:9,18 45:19,25
qualified 25:25
question 3:24 17:19 28:2 29:15 33:9,19 36:8 49:24
questions 3:16 4:7 33:17 53:4 58:5
quid 57:6
quiet 32:17 40:15
quite 10:8 23:9
quo 57:7
quote 50:18

r

r 2:2 3:2,2
raised 56:21,21
ramos 5:12,20
react 32:10

reaction 21:6 30:21
reactions 31:18
read 5:5 20:14
reader 25:4
ready 48:25
real 7:11 21:8
really 3:17 7:6,12 7:17 11:2,3,25 13:14,16,19 14:20 15:24 16:20 17:21 17:22 22:13 23:6 23:7 24:9 30:21 33:7 34:11 37:14 38:3 40:18 42:24 44:23 45:23 50:13 51:7,13 53:24 55:3 56:19
reason 3:22 6:7,11 21:3 36:19 50:13 61:5
reasons 55:14
recall 16:12 56:11 56:13
received 12:25 25:15
recollection 10:5 14:6 19:10
reconsider 11:19 15:16 17:8 22:4 24:23 55:17
record 3:7 40:17 52:12,22 60:11
recruiting 25:12
recruitment 10:9 11:20 12:9,10,11 17:13,18,22 44:18 46:4
redress 33:25 47:5 47:9,25 48:8
refer 47:18
reference 4:3 8:22 30:14
referred 18:4 46:10
relate 3:17
related 60:14
relating 46:12
relationship 22:6 22:16,17 24:14
relatively 7:13
relevant 36:9
reluctantly 11:19
remaining 13:13
remember 7:21 11:13 26:7 28:16 35:19 38:16 53:9
repeat 3:23
repeatedly 28:20 28:24
rephrase 27:25 28:2
report 32:2 47:14
reported 31:23 46:16 60:9
reporter 3:6 52:21 60:6,22
reporting 61:1
republican 27:12
request 30:3 35:21
requested 12:25
required 7:5 45:25
rescind 4:5 35:11
research 53:16 55:3
researched 54:23
resigned 44:4
resources 4:20 41:23
respect 55:7
responded 35:25
response 11:3 54:7
responsibility 10:20
result 15:3
resulted 29:22
results 13:25
resume 11:23 40:8 43:3
resumes 12:11,12 12:21 25:15,18 26:9,11
retire 50:3
retired 50:17,18
review 25:18,24 41:2 43:8
right 16:3 19:4 26:16 35:7 42:6
robert 1:4
rochelle 1:2,6 2:10 3:3,9 41:5 52:18 52:24
role 55:21
roles 37:13
round 11:20 12:7
route 48:6
routine 37:25
run 44:4 51:21,21
running 45:4,10

s

s 2:2 3:2,2 61:5
sara 8:2,11,15
saw 24:3 43:5
saying 7:22 9:8 11:19 16:13 22:9 24:22 38:19,24 40:6,21 47:5 56:22
says 20:16
scale 4:24
scheduled 17:23 18:8,9,13,20 30:24
search 12:2 25:10 44:21
second 4:4 11:20 12:8,10 14:3 24:23,25 34:8,23 35:18 36:7 46:11 46:12 47:2
section 20:16
see 5:21 6:7 8:18 8:19 21:15
seeking 17:14
seen 13:4 35:17
selection 36:14
self 28:19
send 38:23 47:20 47:22
sense 3:19 8:25
sent 14:4 34:14 35:20
service 49:7
session 46:2
set 18:16 60:10,18
seven 5:22 7:8,17 21:20 45:11
share 31:4,7
sheet 61:1
shortly 10:17 11:12 13:2 19:10
show 38:16 41:7
shown 12:15
sidebar 18:24
signature 60:20
significant 21:9
similar 30:17 38:4 54:9
simple 22:10 40:15
sir 39:8 52:14

site 56:17
six 26:18 38:17 50:9 51:4,12
slap 48:25
somebody 6:2,3 7:16 28:9 29:14 43:13 51:19
somewhat 3:22
sorry 52:7 54:20 58:6
sort 9:11 14:20 20:9 26:10 41:13 42:2 57:5
sought 8:23
speak 27:16 38:7 42:18
speaks 35:13
specific 20:13 35:3
specifically 18:9 23:20
specifics 3:18
spoke 5:11 23:11 23:14,17
spoken 48:18
ss 60:4
staff 5:4 10:16 38:3
standard 45:19
standing 15:14
started 10:6
starting 10:19
state 1:10 45:21 60:3,7
stated 50:2
stay 50:9
step 19:14 53:22
stepped 19:15 47:7
stick 4:10,13,13
store 24:4
story 44:6
strictly 41:10,13 42:12
strome 1:9 3:1,8 3:13 4:1 5:1 6:1 7:1 8:1 9:1 10:1 11:1 12:1 13:1 14:1 15:1 16:1 17:1 18:1 19:1 20:1 21:1 22:1 23:1 24:1 25:1 26:1 27:1 28:1 29:1 30:1 31:1 32:1 33:1 34:1 35:1 36:1 37:1 38:1 39:1 40:1 41:1 42:1 43:1 44:1 45:1 46:1 47:1 48:1 49:1 50:1 51:1 52:1 53:1 54:1 55:1 56:1 57:1 58:1 59:2 61:3,21
strong 42:8
struggling 10:17
stuff 52:9
subject 5:18 17:10 18:8,10 28:14 31:15,17
submitting 11:23
subscribed 61:22
substance 4:9 5:8 16:4 56:14
suggest 19:12
suggested 5:14 11:22
suggesting 22:2
suggestion 46:3 48:7
suitable 9:9
summarily 20:5
summer 17:21
summertime 17:20
sure 19:24 20:12 23:22 34:16 56:24 56:25
surprised 7:19 10:11 32:14,20 33:6,7,13 38:5 46:7
surprising 4:19 32:12 39:5
suspect 43:5
sworn 3:4 52:19 61:22

t

t 3:2 52:17
tactical 3:14
take 11:22 20:10 42:25
taken 5:3
talk 5:24 6:17 7:4 18:9 23:13 31:2 32:18,19,24 35:10 38:10 42:9 48:21 48:23 54:25
talked 8:10 33:2,4 46:4
talking 23:25 56:24
tapped 12:21 26:10
tarantino 23:15,17 23:20 25:20 27:11 27:14 30:18 33:3 33:4 35:20
team 4:15
tell 13:16 16:15 17:15 24:19 28:17 28:20 29:6 32:4 32:14,17,20,23 33:14 48:21 53:11
telling 6:2 31:14 31:19
tenet 49:4,5
term 20:20 49:17 51:18 55:21
terminate 6:6
terminated 23:2
terms 15:24 26:13 29:13 31:8 47:4
testified 3:4 52:19
testimony 53:5 57:18
thank 39:7 49:11 52:5,6,13,14 56:5 57:12,15,16
thing 5:5 14:3 37:19,20,25 44:8 44:15 46:8,20 47:2,3 48:19
things 8:5,25 18:3 24:5
think 4:12 7:7,13 8:8,13 10:25 11:4 13:15,16 15:7 16:10 19:17,18 20:7,11 23:7 24:21 26:4,5 27:14,24 28:7,12 29:24 33:19 34:4 34:5,6,18 35:12,25 38:3 43:16,22 44:13 45:2 46:21 48:3,7,13 49:10,15 50:22 55:9,10,17
thinking 40:18
third 5:25 8:12,14
thorough 43:8
thought 10:14 11:9 14:25 15:13

37:20,24
three 4:22 6:6,12 6:20
throwing 38:14
time 1:10 4:8 7:7 7:21 9:8,17,18,20 10:2 12:8 13:5,18 14:10,12,15 15:11 18:10 28:3 35:8 38:23 44:13 46:21 49:20 52:15 55:11 56:6 58:8
timeline 3:19 8:25 9:6 14:7 16:10 19:11 26:13
times 12:16 24:4 27:21 28:13
timing 6:9,14 45:8 51:24
told 3:23 5:17,25 6:3,3,4 7:2 8:8,9 8:12 16:18 17:6 23:12,20 24:2 28:21,24 29:2,7 30:8,9,12 31:15 32:5,19,24 33:8 37:24 48:22
toomey 21:17,18 35:18 36:6 55:2
totally 7:10
touch 28:10
transcript 60:11
transpired 9:20
tremendous 22:21
tricky 46:21
trouble 42:15
true 32:13 60:11
truth 32:21
try 4:5 13:6 32:16 46:24
turn 22:15
twice 28:7,10
two 6:25 8:6,24 9:2 34:4 44:5
type 20:23 47:3 48:19

u

ultimate 24:2
ultimately 14:22
unburden 28:18
uncomfortable 11:8 13:10,17 19:5,13 22:12 23:5,21 24:7 36:21 38:12 54:10
understand 16:24 18:18 25:9,17 27:7,17 40:6 47:10 51:6 56:3,6
understanding 33:2
understood 19:18
uneasy 24:11
unfair 29:22
unfortunate 49:22
unquote 50:18
unusual 7:5 10:18 36:12,18 37:3 38:8 44:23,24 45:2 46:7
update 37:16
updates 17:17
use 47:6
usually 37:16

v

v 61:2
vacation 38:23
veritext 61:1
view 5:4
vince 55:2
violation 34:18,22 35:14 47:11,16 53:17,19
visit 57:19
visiting 5:16
votes 6:6,20 7:2,3 7:8,17,22 35:10,23

w

want 4:9,13 9:4,25 11:24 13:6 16:20 18:18,24 19:8 20:4 22:14 24:12 24:17 29:10 33:5 33:7 35:8,9,9,12 36:9 40:12,14 42:9,21,25 46:9 48:13 53:24 57:12
wanted 13:16 15:21,25 22:24 23:6 24:9 40:11 40:22
wanting 42:16
warren 2:10
watered 26:6
way 12:5 13:19 15:14 23:8 30:4 60:15
ways 34:4 45:14
week 17:24
weekly 18:2
weeks 26:19,21
weird 39:6
went 6:7 8:7 11:13 12:4 38:2 41:10
westchester 2:4 60:5
whereof 60:17
white 2:5
wilson 2:3
withdraw 28:2
withdrawing 16:19 17:15
withdrew 11:11
witness 3:2,8,15 20:12 21:23 24:15 34:3 36:17 39:10 39:17,22,25 41:6,9 41:17 42:20 43:21 44:2,12,25 47:10 48:10,20 49:15 50:5,11,15 51:6 52:6,16,17,23 54:4 54:8,16,18,22 55:7 55:9 56:3 57:16 60:17
witnesses' 61:3
word 4:14 28:24
words 4:9 5:8 16:4 47:7
work 57:14
worked 40:9 41:3
working 22:17
works 15:6,6 41:22
write 12:23 38:18
written 13:19
wrong 41:18 42:6
wrote 9:14,14 13:20 26:14,18

x

x 1:3,5

y

yadira 5:12 8:2,10 8:15
year 9:23,23 16:5 16:9 27:4 30:7 44:5 45:8,9,13 50:4,19 52:11 57:4

years 38:17 40:10 41:8 42:12
york 1:10 2:5 3:9 45:21 52:24 60:3 60:8 61:1