

IN RE:

FORENSIC AUDIT PRESS CONFERENCE

DATE: October 28, 2015

TIME: 10:30 a.m.

LOCATION: City Hall
117 West Duval Street
Jacksonville, Florida 32202

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2 MR. GULLIFORD: I want to thank you-all for
3 coming. I want to start off by introducing the
4 folks on my left. Obviously many of you
5 recognize them, but I would start with Councilman
6 Lori Boyer, Councilman Jim Love, Councilwoman
7 Anna Brosche, State Representative Janet Adkins,
8 John Crescimbeni (microphone fell) -- Fox News or
9 Action News, you've got to redo your thing here.
10 I know who did that. Get up here and fix that.

11 Councilman John Crescimbeni, nattily attired
12 in that orange and blue tie. And our guests from
13 down south, Ted Siedle, or Edward Siedle, as his
14 formal name is.

15 We, of course, today are presenting the
16 147 -- or 143 page, something like that, forensic
17 investigation of the Police and Fire Pension
18 Fund.

19 For a number of people, this forensic
20 investigation of the Police and Fire Pension Fund
21 would generate the obvious emotion: Anger. But
22 for me, getting past the anger, I feel profound
23 sadness for our citizens. With all the needs in
24 this city I witnessed in my over four years on
25 the council, the revelations by this report are

1 reprehensible.

2 A vast and staggering sum of money has been
3 recklessly squandered and now lost forever to
4 this community. From higher paid police
5 officers, firefighters, general employees, to
6 downtown development, neighborhood
7 revitalization, children's programs, better
8 streets, whatever the need, we don't have the
9 money.

10 Why? Because of a huge unfunded, bloated
11 and excessively expensive pension fund that no
12 one was properly watching. And, yes, there's
13 plenty of blame to spread around. For those who
14 have been party to this loss, shame on you.
15 Driven by greed, indifference, ignorance,
16 complacency, lack of attention or whatever the
17 reason, those individuals carry a large burden of
18 guilt.

19 Each of us shares in that guilt to some
20 degree, however, from citizens, unions, city
21 government and even the media. It started in
22 2000 with an ill-conceived and illogical 30-year
23 agreement.

24 Coming forward, there were numerous red
25 flags, including a serious warning from Florida

1 Taxwatch. We did nothing. The report itself is
2 an indictment and begs the question, Who was
3 really watching?

4 The audit points out one major
5 consideration. It would be bad enough that the
6 fund has been excessive with its administrative
7 expenses, but to compound the condition, it has
8 done a miserable job of ensuring proper return on
9 its assets.

10 Mr. Siedle indicates a \$370 million loss in
11 returns, but the very least, comparing the fund
12 performance to a very conservative Standard &
13 Poors benchmark.

14 There's questionable conduct on the part of
15 the executive director, fund managers, general
16 counsel and even board members. Need an example?
17 How about the continuing legal battle over a
18 \$300-plus public records request that the fund
19 has now spent almost \$400,000 defending?

20 It continues -- and they continue to fight
21 even though they've lost at every judicial level.
22 Ridiculous. For what purpose?

23 There is more than enough in the report to
24 raise ire and questions. I'll leave it to you to
25 review the specifics and the details in the

1 copies provided. You will hear some of those
2 responsible claim the report is flawed or
3 inaccurate.

4 Let me remind you that Edward Siedle, the
5 gentleman who audited the fund, has impeccable
6 credentials. Simply to go to his web page will
7 show for yourself those credentials. I dare you
8 could not -- I dare to say you could not find a
9 person in this country more qualified to conduct
10 such an audit, and he has done pension audits for
11 major cities, counties and Fortune 500 companies.

12 To those who say there are inaccuracies, my
13 answer to you is: Prove it.

14 Also, I want to remind you that the fund was
15 less than cooperative in providing some of the
16 information he sought, hence the need for the
17 finance committee to issue subpoenas for some of
18 the information on these.

19 But finger-pointing is not a solution. More
20 than anything else this audit is a call to
21 action. I promise the time that I have left on
22 this council I will push continuing investigation
23 and reform.

24 Lest we forget, we have a serious and
25 unresolved funding problem with the General

1 Employees Pension Fund. Attention to that fund
2 has been ignored for the past four years, and
3 it's time to initiate resolution to address its
4 huge unfunded liability.

5 I urge my colleagues in the administration
6 to seek answers, find the funding needed and
7 continue to press for reform. There are serious
8 questions still to be answered and steps taken.
9 I have been assured by Mr. Siedle that with
10 additional information we might provide from our
11 subpoenas or other sources, there will be
12 supplements to his audit.

13 The silver lining in all of this is that
14 we're coming to grips with our problems and
15 solution and situation. We have taken positive
16 steps with our recent reform legislation.

17 I recognize that without the affirmative
18 vote of the Police and Fire Pension Fund Board,
19 we would not have been successful. I believe
20 they know the seriousness of this for all of our
21 community.

22 With the administration we are addressing
23 the potential resources of funding to reduce the
24 unfunded liability. The governance provisions in
25 the reform legislation are equally important, and

1 that was due to the great work of the pension
2 reform task force headed by Bill Scheu.

3 The way forward is tough, but collectively
4 as a community we will solve it and make it
5 stronger for the future, protecting not only
6 taxpayers, but the police officers and
7 firefighters who are served by this pension.

8 De Tocqueville said, "The greatness of
9 America lies not in being more enlightened than
10 any other nation, but rather her ability to
11 repair her faults."

12 We will repair our faults once and for all.
13 Thank you.

14 And with that, I'm going to afford
15 Mr. Siedle an opportunity to make any comments he
16 would like to make and anyone else up here. I
17 would like to call on Representative Adkins too
18 to have an opportunity to do that. You can ask
19 them any questions you want.

20 So, Mr. Siedle.

21 MR. SIEDLE: Thank you.

22 I would like to thank the people of
23 Jacksonville for trusting me to do this
24 investigation. Forensic investigations are never
25 fun, but they're necessary. The investigation,

1 in a nutshell, showed that this pension adopted
2 the highest federal ERISA fiduciary standards and
3 told the public that it would be observing these
4 higher standards. In fact, the pension didn't
5 even observe state standards.

6 So like the Hebrew National commercial where
7 they say, we have to answer to a higher
8 authority, this pension didn't even answer to the
9 lowest authority that they were required to
10 follow.

11 I would -- I'll answer any questions that
12 you-all have.

13 MS. KELLEY: Eileen Kelley, Florida
14 Times-Union.

15 If you were to rank the pension fund -- I
16 know you've done other forensic investigations --
17 would you give it any sort of grade letter?

18 MR. SIEDLE: I would give it a D minus, and
19 one of the reasons I would give it such a -- such
20 a low rating is because of the profound lack of
21 transparency. Lack of transparency is a red
22 flag. By red flag, I mean, it's a red alert.

23 In the context of a forensic investigation
24 of a severely underfunded, highly controversial
25 pension, to have that to create a lack of

1 cooperation is very disturbing.

2 UNIDENTIFIED MALE: What does the term
3 "forensic investigation" mean? What did you do
4 to make it a forensic investigation?

5 MR. SIEDLE: Forensic means evidence
6 suitable for a court of law. So it really refers
7 to the quality of the proof that you're
8 analyzing, and that's all it means, simply.

9 UNIDENTIFIED MALE: You admitted you had
10 trouble getting copies. What were you looking at
11 (inaudible)

12 MR. SIEDLE: Some of the fundamental
13 documents that we need to look at are documents
14 that indicate the performance of the investments
15 of the pension.

16 What we discovered was that the documents
17 that we were provided were clearly wrong, and the
18 consultant to the pension agreed that they were
19 clearly wrong.

20 So that's a key issue. If you don't know
21 how the pension has performed, then you cannot
22 analyze how severe the losses may have been.

23 UNIDENTIFIED MALE: What documents did you
24 use to reach those conclusions (inaudible)

25 MR. SIEDLE: The documents were --

1 UNIDENTIFIED MALE: How did you reach those
2 conclusions (inaudible)

3 MR. SIEDLE: The documents -- we were
4 provided certain documents and many of the
5 documents were -- we requested documents over a
6 20-year period and we were given only ten years
7 worth of documents. But we worked with the
8 documents we were provided, we worked with the
9 documents that are on the funds' website, and we
10 also used collateral sources.

11 UNIDENTIFIED MALE: Are you of the opinion
12 that what you found is criminal?

13 MR. SIEDLE: Hopefully not. But until we
14 see the evidence, the information we've
15 requested, we won't have an answer to whether
16 there's potential criminality or not.

17 UNIDENTIFIED MALE: So what should happen
18 now?

19 MR. SIEDLE: It's my understanding that the
20 city council either will or has already issued
21 subpoenas for the information that the fund has
22 failed to provide.

23 UNIDENTIFIED FEMALE: You mentioned several
24 hundred million dollars in potential losses,
25 unrealized investments, things like that. Can

1 you break down for just the average person or the
2 average person that's vested in that fund, what
3 exactly does that kind of large number mean for
4 what we could have today?

5 MR. SIEDLE: Well, first thing to remember
6 is we don't know the performance of this fund,
7 and according to the board and the consultant to
8 the fund, they don't know the performance of the
9 fund.

10 So we are analyzing -- we are -- our
11 estimates are based upon suspect data to begin
12 with. But what we're looking at is how would the
13 fund have performed, how much more money or less
14 money would it have today had it been invested in
15 a representative index of 75 percent of the S&P
16 500 and 25 percent on a bond index.

17 And so what we found was over the last 20
18 years, it had underperformed by 370 million.

19 Again, we don't know if that number is too
20 high, too low, because nobody has the accurate
21 performance data.

22 UNIDENTIFIED FEMALE: Underperforming by
23 potentially that amount of money, if that had
24 been realized, would that have been more funding
25 toward the pension debt? Would that have been

1 better benefits, pay-outs for those vested?

2 MR. GULLIFORD: That would have meant --
3 let's assume 370 million is a real number. That
4 means \$370 million less contribution on the
5 contribution on the part of the city in some form
6 or fashion; i.e., taxpayers.

7 Yeah. That would have phased out all our
8 septic tanks in the city, by the way.

9 UNIDENTIFIED FEMALE: Mr. Siedle, can you
10 talk a little bit about the travel that's
11 mentioned in this report by John Keane and the
12 board members? He's obviously taken a lot of --
13 not a lot of vacation and he's getting paid for
14 that now that he's retired.

15 MR. SIEDLE: Well, as I mentioned in the
16 report, travel to -- extensive travel to exotic
17 locations has been a controversial issue for
18 public pension trustees across the country. This
19 has long been a major controversy.

20 And the travel that we see here is -- has
21 been extensive and, in my opinion, unwarranted.
22 So there was some great work done by the city
23 ethics officer who uncovered just how expensive
24 some of the travel had been.

25 In my opinion, there is no justification

1 for using pension assets to that extreme.

2 UNIDENTIFIED MALE: Of all the pensions
3 you've reviewed, how does this one rank, bottom,
4 quarter, the middle?

5 MR. SIEDLE: Well, I gave it a D minus
6 rating. So I would say it's certainly in the
7 bottom quarter.

8 But the lack of transparency, again, is
9 critical. The fact that this information in this
10 context has not been provided is very alarming.
11 I think citizens should be very, very worried
12 about that.

13 UNIDENTIFIED FEMALE: You and I talked about
14 this yesterday. What can the city do to try to
15 get some of this money back? Is it possible to
16 get any money back?

17 MR. SIEDLE: Well, the report recommends
18 that the city contact the FBI, the Securities and
19 Exchange Commission, the Department of Justice,
20 the Florida Bar. And we -- possibly the attorney
21 general.

22 But what needs to happen is we need to go
23 through the pension and look at all the
24 agreements they have with all of their money
25 managers. Many of those agreements were drafted

1 wrongly. They indicate that the fund is not
2 subject to ERISA fiduciary standards.

3 So a review needs to be done of how the
4 money was actually managed, and if there are any
5 losses because the money was improperly invested,
6 then they could potentially be recoverable.

7 Also, under ERISA the board itself is
8 personally liable. One of the things I bring out
9 in the report is that the board doesn't have any
10 insurance. So when the board fights citizens
11 over public records requests, they spend pension
12 money to do that. Under ERISA, that's
13 unacceptable.

14 So these are some of the changes that need
15 to be made. And under ERISA all the money
16 managers, all the staff, all the board could be
17 potentially personally liable.

18 UNIDENTIFIED MALE: To the extent the
19 pension fund does pay for travel, have lawyers
20 and fees, where should that money have come from
21 if not from the pension funds?

22 What should be the source of that funding
23 for the pension fund to operate?

24 MR. SIEDLE: Well, the pension fund can't --
25 assets from the pension fund could be used

1 conservatively to -- as long as they're used for
2 the -- under ERISA, the exclusive benefit of the
3 participants.

4 So a certain amount of limited travel could
5 be possibly paid for out of the plan. It's a
6 question of use versus abuse.

7 UNIDENTIFIED MALE: And the same thing for
8 attorney's fees. If someone sues for public
9 requests, where should the money come from
10 because -- money to fight (inaudible)

11 MR. SIEDLE: Well, that's what you have
12 insurance for. And an insurer imposes a
13 discipline and tells boards that they should stop
14 doing certain things. An insurer provides a
15 check-and-balance to the system.

16 So that's where if the board is sued, the
17 insurance should kick in and cover the cost.

18 UNIDENTIFIED MALE: In your experience, is
19 it uncommon for a municipal pension fund not to
20 use these conservative index funds that you
21 compared it to?

22 Is that -- is it common practice to use a
23 conservative fund that you were comparing that
24 370 million underperformance to?

25 MR. SIEDLE: It's standard throughout the

1 industry to compare actively managed funds with a
2 standard -- S&P 500 bond index.

3 UNIDENTIFIED MALE: Do they normally
4 outperform?

5 MR. SIEDLE: Some do. Some don't,

6 UNIDENTIFIED MALE: Do other -- is it
7 uncommon to find a pension fund that isn't using
8 the index that you're using for the bench line?
9 Do some funds just go ahead and use that?

10 MR. SIEDLE: Well, the pension fund does use
11 those indexes for comparing the management.

12 ERISA, by the way, for those of you who
13 don't know, is the Employee Retirement Income
14 Security Act. And it is a comprehensive federal
15 regulation that applies to all the private
16 corporate pension plans.

17 ERISA ironically does not cover public
18 pension plans. So that's the loophole that
19 swallowed the act almost. So public pension
20 funds throughout the nation involving trillions
21 of dollars are not subject to any comprehensive
22 federal law.

23 However, this pension fund adopted ERISA to
24 apply and indicated that all of the staff, the
25 board staff and all the vendors to the fund would

1 be subject to high ERISA fiduciary standards.

2 MR. GULLIFORD: She's got one last question.

3 UNIDENTIFIED FEMALE: Did the board not have
4 insurance because it didn't want it or because it
5 couldn't get it? Are they just not typically
6 insured or?

7 MR. SIEDLE: Boards typically have
8 insurance.

9 UNIDENTIFIED FEMALE: So this board in
10 particular opted out?

11 MR. SIEDLE: I don't know.

12 UNIDENTIFIED FEMALE: But they didn't have
13 it?

14 MR. SIEDLE: They did not. Neither of your
15 pensions have insurance. Neither of the two city
16 pension boards, it's my understanding, have
17 insurance.

18 UNIDENTIFIED FEMALE: This may be a question
19 more for someone with the city or the
20 representative --

21 MR. GULLIFORD: Okay. I'll tell you what,
22 before we do that, I'm going to give
23 Representative Adkins an opportunity to speak,
24 and then if any of my colleagues, if they want to
25 kick in, and then we'll open up questions of

1 anybody you want to ask.

2 REPRESENTATIVE ADKINS: Thank you.

3 I'm here today to applaud the Jacksonville
4 City Council for authorizing this forensic audit.
5 It's important that the people of Jacksonville
6 have public confidence and public trust restored.
7 And this is a first step. This is a very
8 important first step.

9 So I want to thank you, Councilman
10 Gulliford, for taking the lead on this very
11 important issue.

12 When you look at -- when you look at all of
13 our employees who depend every day on this
14 pension, it's important that we make sure that
15 this pension is properly funded. It's a matter
16 of fulfilling a promise that's been made to these
17 people.

18 And so it's one thing to have promises on
19 paper. It's another thing to be able to fulfill
20 those promises by providing that monthly check
21 that they depend on.

22 So thank you so much for your leadership on
23 this issue, and I look forward to working with
24 you as we move forward in the process.

25 MR. GULLIFORD: I just want to add a

1 footnote. Representative Adkins has gone out of
2 her way to assist us every way she could with
3 respect to this big issue. And that is to the
4 magnitude of the issue, I want you to think about
5 one thing.

6 I spoke at Florida Taxwatch's annual
7 meeting. As a matter of fact, Ted was there too.
8 And they -- of course, our topic was, guess what?
9 Pensions. And they were decrying the fact that
10 throughout the State of Florida the unfunded
11 pension liability is just over \$10 billion.

12 So I was able to announce to them that we
13 made up 25 percent of that, or roughly. But
14 there's not 25 percent of the population in the
15 City of Jacksonville.

16 So if you want something to weigh it
17 against, that's the -- that's the size of our
18 problem.

19 With that, anyone else care to speak?

20 Ms. Boyer, I'm surprised -- Council Vice
21 President Boyer. I'm sorry.

22 Oh, by the way, the full report is on the
23 city council web page probably by now. If it
24 isn't up yet, it will be up very shortly. So you
25 can access it there, the full context. And if

1 there's something else that we could provide by
2 the way of copies of anything, we certainly would
3 be willing to do that.

4 With that, any other questions?

5 UNIDENTIFIED FEMALE: We know the council
6 has already put forward some subpoenas, but there
7 are a lot of recommendations, including going
8 back to the governor, get the FBI involved.

9 In terms of the council, what is our next
10 step here?

11 MR. GULLIFORD: Well, I think we might have
12 a discussion about it at the next finance
13 committee meeting and see how we might go
14 forward. I think it's worth the discussion.

15 I know there's outstanding colleagues on the
16 finance committee, some of whom are here with me
17 today, and I'm sure that there will be some
18 approach to -- some organized approach to
19 pursuing some of the recommendations or all of
20 the recommendations that have been advanced.

21 Anyone else before we --

22 Yeah, Mr. Gabriel, hiding out there? Can
23 you give us any kind of update on the status --
24 they would like to know the status of the
25 subpoenas. I think they've been drafted and -- I

1 don't know where we are.

2 But this is General Counsel Jason Gabriel,
3 who has been a great asset for us and help.

4 MR. GABRIEL: Jason Gabriel, General
5 Counsel. As you can imagine, I'm going to be
6 circumspect about the status of the subpoenas. I
7 can tell you they have been drafted, they have
8 been issued, and they're out there. And that's
9 all I can say about that at this time.

10 I'm sorry?

11 UNIDENTIFIED FEMALE: They have been issued?

12 MR. GABRIEL: They have been issued.

13 UNIDENTIFIED MALE: Who did you issue them
14 to?

15 MR. GABRIEL: They have been issued pursuant
16 to the authority. The council has the authority
17 to issue the subpoenas. They have authorized the
18 council secretary to issue them. And as you know
19 and as you may recall from that action, it was on
20 the fund and the attorney, Mr. Klausner.

21 UNIDENTIFIED FEMALE: Have they been served?

22 MR. GABRIEL: I'm not going to answer that
23 question at this point in time. Thank you.

24 UNIDENTIFIED MALE: Counsel, Mr. Siedle
25 obviously recommends bringing this to the

1 attention of all these other agencies.

2 Is there a plan to (inaudible) envelope and
3 send them out? Do you plan to ask counsel -- if
4 you agree with that, how are you going to get --
5 really, it's for Councilman Gulliford (inaudible)

6 MR. GULLIFORD: Are you going to answer it?

7 MR. GABRIEL: Well, I was just going to say,
8 what we're going to do is review it, review every
9 word on it, and then take it under advisement
10 after that.

11 MR. GULLIFORD: Right. And we will -- we
12 will look to them for guidance, obviously. But I
13 think we've collectively -- and let me say
14 something else that has happened and I want
15 you-all to be aware of, because as I said earlier
16 in the comments, you know, finger-pointing is not
17 a solution. It doesn't get us anywhere. We've
18 got a problem and we recognize it.

19 There is some potential for recovery. And
20 we might say beyond even the fund itself, there
21 is some potential for financial recovery because
22 of the bad conduct of some of those who have
23 advised in the past or consulted in the past, et
24 cetera.

25 So I want everybody to be aware of that

1 possibility, but I also want you to be aware that
2 the chairman of the Police and Fire Pension Fund
3 has contacted me and wants to sit down, and I
4 think we've already scheduled it, and have a
5 meeting amongst ourselves.

6 I think it will be an open meeting. I would
7 want nothing less than an open meeting, frankly,
8 because I think he's talking about engaging the
9 other trustees, and sit down with the council
10 auditor, the general counsel, the folks from
11 finance, Joey Greive and others with the
12 administration, and let's talk about this thing.
13 I mean, I think that's healthy.

14 We're past the stage of, as I said, pointing
15 fingers. We need -- we need resolution and we
16 need solutions and we need to move in the right
17 direction. So that's going to be forthcoming.

18 Anything else?

19 UNIDENTIFIED MALE: My name is (inaudible)
20 citizen of Duval, Jacksonville. I just want to
21 say how irritated and irate I am that this has
22 been allowed to go on for so many years. I
23 appreciate you, the council, and everyone else
24 who has brought this to light.

25 In my opinion, the chairman, Mr. Keane -- I

1 think there should be legal recourse against the
2 gentleman. He's (inaudible) and the things he's
3 done, he's gotten away with. I will have an ax
4 to burn, but I think legal action should be
5 brought against this fund and its directors. And
6 it's got to come to a stop to the citizens of
7 Duval and Jacksonville. They're fed up with this
8 abuse. There needs to be resolution.

9 MR. GULLIFORD: Sir, I can assure you that
10 we will pursue every avenue as far as
11 investigation and resolution. It's something
12 that we take seriously, and it is a priority,
13 especially for me, I think.

14 So with that, anybody else?

15 MR. SIEDLE: I just want to add one thing,
16 that the United States Securities and Exchange
17 Commission instituted a new whistle-blower
18 program about two years ago pursuant to the
19 Dodd-Frank reforms, which today any citizen can
20 file this report with the SEC and ask for an SEC
21 investigation.

22 So with respect to any other agency of
23 government, any citizen can take this report and
24 file it with that agency. So it's something to
25 keep in mind.

1 In other jurisdictions where I've done
2 investigations, hundreds of people have filed the
3 reports with their state attorney generals and
4 with the FBI and others.

5 MR. GULLIFORD: Thank you.

6 Anyone else? You would have to end it,
7 wouldn't you? Last word.

8 UNIDENTIFIED FEMALE: Is it still the
9 council's intention to go ahead and try to get a
10 settlement with Mr. Keane for his unauthorized
11 pension or --

12 MR. GULLIFORD: That was the directive of
13 the legislation that was passed. I don't know
14 what the status is, but I would say that, yes, it
15 is at present --

16 UNIDENTIFIED FEMALE: No changes --

17 MR. GULLIFORD: -- have not heard anything
18 at all. I know that there's been some ongoing
19 discussions, negotiations or the like, and I'm
20 not apprised of anything as to the results.

21 UNIDENTIFIED FEMALE: I was just curious in
22 light of the -- this audit.

23 MR. GULLIFORD: I'm only one lowly
24 councilman amongst 19, you know, 18, others. I
25 can't speak for all of them. So we'll see. I

1 guess it will be a matter of -- Ms. Boyer, I was
2 hoping.

3 COUNCILWOMAN BOYER: So I'm going to correct
4 that comment a little bit because I would not say
5 that we authorized or directed -- we didn't
6 direct settlement.

7 What we directed and authorized was the
8 filing of the lawsuit. And we said, as with any
9 lawsuit, the general counsel had the authority to
10 enter into negotiations for settlement.

11 Whether the information in this document
12 informs those negotiations remains to be seen.

13 MR. GULLIFORD: Just like all the women in
14 my life correcting me on a regular basis.

15 Yeah, so with that, anyone else? Thank
16 you-all for coming and thank you for your
17 interest in this very difficult time.

18 (The press conference ended.)

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1 CERTIFICATE OF REPORTER

2
3 STATE OF FLORIDA

4 COUNTY OF DUVAL

5 I, Denice C. Taylor, Florida Professional
6 Reporter, do hereby certify that I transcribed a DVD
7 given to me by the Jacksonville Police and Fire
8 Pension Fund staff of a meeting held at Jacksonville
9 City Hall, on October 28, 2015, and that the foregoing
10 transcript, pages 2 through 26, is a true transcript
11 of the DVD, to the best of my ability.

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

17 DATED this 11th day of November, 2015, at
18 Jacksonville, Duval County, Florida.

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20 _____
21 Denice C. Taylor, FPR
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