

THE FLORIDA SENATE

IN RE: EXECUTIVE ORDER OF SUSPENSION, NUMBER 19-14,
Suspension of Mr. Scott Israel, Sheriff
Broward County, Florida

-----/

VOLUME III
(Pages 308 through 471)

TRANSCRIPT OF PROCEEDINGS

HEARING FOR REVIEW OF
EXECUTIVE ORDER OF SUSPENSION

DATE: June 19, 2019
TIME: 9:00 a.m. - 12:40 p.m.
LOCATION: Room 110, Senate Office Building
404 South Monroe Street
Tallahassee, Florida 32399
BEFORE: Dudley Goodlette, Special Master

COPY

Reported by:

JESSICA RENCHEN, Court Reporter
For the Record Reporting, Inc.
1500 Mahan Drive, Suite 140
Tallahassee, Florida, 32308

1 APPEARANCES OF COUNSEL:

2 On behalf of Governor DeSantis:

3 NICHOLAS A. PRIMROSE, ESQ.

JOHN MACIVER, ESQ.

4 Deputy General Counsel

Executive Office of The Governor

5 The Capitol, PL-05

Tallahassee, Florida 32399

6 E-mail: Nicholas.primrose@eog.myflorida.com

7 On behalf of Sheriff Israel:

8 BENEDICT P. KUEHNE, ESQ.

Kuehne Davis Law, P.A.

9 100 S.E. 2d Street, #3550

Miami, Florida 33131-2154

10 Phone: 305-789-5989

E-mail: Ben.kuehne@kuehnelaw.com

11

STUART N. KAPLAN

12 Kaplan & Parker, LLP

3399 PGA Blvd, Suite 150

13 Palm Beach Gardens, Florida 33410-2809

Phone: 561-296-7900

14 E-mail: Skaplan@kaplanparkerlaw.com

15

16

17

18

19

20

21

22

23

24

25

INDEX OF WITNESSES

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

WITNESS

PAGE

SCOTT ISRAEL

Continued Direct by Mr. Kuehne

318

Cross Examination by Mr. Primrose

385

REPORTER'S PAGE

471

P R O C E E D I N G S

(Proceedings continued from Volume II.)

SPECIAL MASTER: Good morning. It's 9:00 a.m. on Wednesday, June 19th, and this is the continuation of the final hearing with regard to Executive Order of Suspension 19-14, suspension of Scott Israel, Sheriff of Broward County.

Counsel, before hearing further testimony from Sheriff Israel this morning, there is a brief procedural matter that I would like to discuss. At the conclusion of the hearing, I will be requiring the parties to submit proposed findings of facts and conclusions of law. I would like to have those submissions staggered, with the governor's brief coming a week before the sheriff's -- Israel's brief. I would encourage the parties to -- during the break today to discuss the -- and see if they can consent to a timeframe for these submissions, and if that can't be accomplished, if you're not able to do so, then I will enter an order with a briefing schedule after the hearing.

Also, given that the parties will have an opportunity to present their case in writing, I plan to forego closing statements today.

1 And you may now proceed. At the conclusion
2 yesterday, we were under direct examination of
3 Sheriff Israel. And just remind Sheriff Israel,
4 as you jump back on the witness stand, that you
5 are still under oath.

6 THE WITNESS: Yes, sir.

7 SPECIAL MASTER: Please proceed, Counsel.

8 MR. KUEHNE: Special Master, we do have one
9 item we want to add to the record to preserve the
10 record. It will just take a moment.

11 SPECIAL MASTER: Okay, sir.

12 MR. KAPLAN: Special Master, if I may?

13 SPECIAL MASTER: Mr. Kaplan.

14 MR. KAPLAN: Thank you.

15 Special Masters, good morning. As you
16 recall, one of the first things that I did
17 yesterday morning was obviously we addressed our
18 concern with respect to whether or not in any way
19 Scott Israel's due process rights may be at risk
20 with respect to the failure to be able at this
21 point to have the benefit of the FDLE
22 investigation.

23 As you know, there were -- it's been made
24 public that there were over 180 witnesses who were
25 interviewed, as well as 200 or 200 plus

1 investigative reports. And one of my concerns to
2 you, Special Masters, was not only whether or not
3 actual due process may be at risk, but also, as
4 you know, the appearance of due process is always
5 called into question, especially when we talk
6 about what the public's perception is.

7 It wasn't two seconds after I sat down,
8 Special Masters, that the governor's attorney
9 stood up in his opening statement to you. And it
10 is interesting to me that sometimes government
11 attorneys, whether they're on the state level,
12 local level, or federal level, fail to realize
13 that they are still regulated under the Florida
14 Bar, as well as the ABA, with respect to the code
15 of conduct, as well as the ethical requirements.
16 And you may recall, Special Masters, that the
17 governor's attorney called out Scott Israel as by
18 contesting these -- this removal as,
19 quote/unquote, being shameful. Mr. Primrose said
20 on the record that it is shameful that Scott
21 Israel is basically coming before Your Honor in
22 contesting this removal. I equated that statement
23 as if a prosecutor in a criminal case was to
24 identify in a closing argument the failure of a
25 defendant taking the witness stand. As you would

1 know, that would be an automatic mistrial, and
2 certainly that government attorney would be dealt
3 with and probably sanctioned for those type of
4 comments.

5 Notwithstanding, we let it go. Obviously,
6 there has been the undertone of our concern that
7 the removal of Scott Israel was not based upon any
8 merits or facts, but it was politically motivated,
9 and we do know that several months ago when
10 Governor DeSantis was making his speech before the
11 Florida Senate almost as if to strong-arm the
12 senators, he made it well-known that anybody who
13 would vote against his suspension or removal of
14 Scott Israel may have to deal with him later on.
15 And that's certainly -- we took that as a clear,
16 overt threat.

17 Notwithstanding, Your Honor, after last
18 night's proceedings, and notwithstanding that
19 these proceedings are still open, the fact that we
20 have not had an opportunity to present our closing
21 remarks and certainly to allow the process to take
22 its course, Governor DeSantis went on record last
23 night and, quote, said, "It is shameful Israel is
24 still fighting the reasons for his dismissal when
25 his wrongdoings as sheriff are so clear." Now,

1 sir, you can only interrupt those statements as
2 trying to influence the ultimate decision-maker in
3 these proceedings. And that is of great concern
4 to Scott Israel, to Mr. Kuehne, and to myself,
5 because as a practicing attorney, having been
6 admitted to the New York State Bar 30 years ago, I
7 stand before you with a tremendous respect and
8 deference and understanding that while some may
9 look at the practice of law now in this day and
10 age in 2019 more like a sporting contest other
11 than what it should be in the application of the
12 administration of justice and to ensure that
13 justice is administered equally and fairly, I am
14 concerned and I wanted to call to your attention
15 so that we would make a record of our concern
16 that, again, the governor and through his
17 attorneys have made these type of statements that
18 certainly would cause condemnation in the public's
19 eye, as well as his attempt to circumvent the
20 process and interfere and try to coerce or
21 influence the ultimate decision-makers. And so I
22 just wanted to call that to your attention and
23 make a note of it and certainly make a record of
24 it.

25 SPECIAL MASTER: Let me just say -- I want to

1 ask Mr. Primrose to respond, but let me just say
2 that whatever comments the governor has made will
3 not influence the report that I am going to
4 provide to the senate president.

5 Mr. Primrose.

6 MR. KAPLAN: May I just say I appreciate that
7 response, sir.

8 SPECIAL MASTER: Mr. Primrose.

9 MR. PRIMROSE: First of all, it's deeply
10 concerning that as a member of the bar, that there
11 even be an accusation that I somehow committed
12 unprofessional or unethical conduct. However, Mr.
13 Kaplan, if he feels that that has happened, there
14 is an appropriate procedure to do that, and I
15 certainly would enjoy my due process rights if he
16 believes that I've somehow violated my oath to the
17 Florida Bar and the professional rules of conduct.

18 What I will say is this: That the Florida
19 voters in 1968 approved an amendment to the
20 Florida Constitution giving the Florida Senate the
21 power to develop the rules and procedures, that
22 the Florida Senate would conduct a removal or
23 reinstatement process. It's the Florida Senate's
24 rules and procedures on what is due process. This
25 procedure is due process. It's open to the

1 public. The governor is an independently-elected
2 official who can make comments about why he chose
3 to suspend Scott Israel from office. And Scott
4 Israel is provided the opportunity to come before
5 the senate and the entire media and make his case
6 for why he thinks that he should not be removed
7 from office.

8 But I will say this: There are 40
9 independently-elected Florida senators that will
10 read your report and they will take into
11 consideration all of the evidence and testimony
12 provided by Scott Israel and the governor's office
13 in making their decisions, and I would assume that
14 all 40 independently-elected Florida senators will
15 make their decisions based on their thoughts and
16 opinions, not based on what any other elected
17 official in the State of Florida says.

18 SPECIAL MASTER: Thank you, Mr. Primrose.
19 Let me just say that the statements that have been
20 made are now part of the transcript.

21 Okay. Let's please continue with the
22 proceedings. Your witness, Mr. Kuehne.

23 MR. KUEHNE: Thank you.

24 SPECIAL MASTER: And, Sheriff, you're still
25 under oath, if you will.

1 THE WITNESS: Understood, sir.

2 CONTINUED DIRECT EXAMINATION

3 BY MR. KUEHNE:

4 Q. Good morning, Sheriff. When we broke last
5 night, we were speaking about the Fort
6 Lauderdale-Hollywood Airport shooting. Do you recall
7 that?

8 A. I do.

9 Q. And I had posed a number of observations to
10 you that were raised by the governor in support of the
11 position that you were negligent or incompetent. Do
12 you recall that section?

13 A. I do recall that.

14 Q. So let me -- let me continue.

15 SPECIAL MASTER: Mr. Kuehne, is your
16 microphone on?

17 (Discussion off the record.)

18 BY MR. KUEHNE:

19 Q. The governor's bench memorandum submitted in
20 this case -- and you've read that, right?

21 A. I have.

22 Q. -- includes this statement in support of
23 the -- the governor's suspension claim. And it says,
24 and I'm quoting, this is at page 5, "While not an
25 exhaustive recitation of the initial draft report's

1 findings, it reveals faults with BSO, especially given
2 the November 1, 2013, shooting that occurred at the
3 Los Angeles International Airport and acts of
4 terrorisms that have elevated the need for efforts to
5 protect airport." That's the statement.

6 Is it your understanding that the initial
7 draft report done by the officer was vetted by others,
8 not by you?

9 A. The initial report, to my knowledge, was not
10 vetted by anyone, it was just turned in.

11 Q. It was reviewed after it was turned in?

12 A. Yes.

13 Q. And then vetted by others, not by you?

14 A. That's correct.

15 Q. There were command staff-level meetings?

16 A. Yes.

17 Q. Did you direct or order anything about how to
18 go through the process of working from that initial
19 draft report to get it into the final official
20 version?

21 A. Not at all.

22 Q. Who was in charge of that --

23 A. Ultimately --

24 Q. -- process?

25 A. Ultimately, the undersheriff was in charge of

1 the process.

2 Q. The undersheriff had that responsibility?

3 A. Yes, he did.

4 Q. And then once that's done, you're the final
5 authority?

6 A. That's correct. I would take the final
7 responsibility for the end product.

8 Q. And you explained how that process got to
9 you?

10 A. I did.

11 Q. Was BSO in the Sheriff Israel tenure focused
12 on and did it learn from the events at the Los Angeles
13 airport?

14 A. Absolutely.

15 Q. That was another attack, right?

16 A. It certainly was.

17 Q. And did that become part of the BSO process
18 of understanding what might happen in our community?

19 A. Yes. Actually, at the Broward Sheriff's
20 Office, I particularly on purpose made sure that our
21 command staff was diversified regarding talents and
22 how we all came to the ranks of colonel and lieutenant
23 colonel and majors. And we had about three or four of
24 our upper command staff, including myself, who were
25 former SWAT commanders. So we understood the adage

1 when we were young in this profession, we understand
2 that when people need police, they call 911. When the
3 police need police, they call SWAT. So I've always
4 understood how important it is to be cognizant of
5 training, preparation, planning.

6 Every critical incident in this country that
7 would happen, within a day or two, myself and four or
8 five or six other upper-command staff would sit in the
9 office and we would read and talk about lessons
10 learned from that. Now, they haven't even done action
11 plans yet, but we were talking about the Pulse
12 Nightclub the next day and what are the take-aways,
13 what could we learn initially. We certainly have
14 ability to talk to men and woman in the profession and
15 learn these things. So training and preparing for the
16 next attack, because, sadly, as I sit here and testify
17 today, somewhere in this country, there's going to be
18 another active killing. It's not a matter of if, it's
19 a matter of when. And that's why we have to be
20 vigilant, vigilant. And that was kind of the -- the
21 underlying tone of our administration, be vigilant.
22 We know we can't prevent a crazed individual from
23 doing what he or she is going to do, but perhaps if we
24 plan our response better and we learn, we can save
25 people's lives, we can get there quicker, we can get

1 there safer.

2 Training -- we throw the word "training"
3 around, but training is an ever-evolving thing. Every
4 time a critical incident happens, police train
5 differently. We learned from Columbine. Now we do
6 things a different way.

7 And my biggest take-away, Mr. Kuehne, at
8 Marjory Stoneman Douglas was we realized that we want
9 to enter a building as soon as possible and we want to
10 do one of three things: We want to eliminate the
11 target, we want to arrest the target, we want to have
12 the target flee or barricade himself or herself
13 without hostages. And as we went through Stoneman
14 Douglas, we realized that although the killer was
15 already gone, we no longer want to continue to push
16 forward. If we don't know where the killer is, we
17 want to stop and triage and we want to start to save
18 lives.

19 One thing the governor never brought out -- I
20 don't even know if they know -- is that police, Coral
21 Springs, BSO, and other police officers -- I'm not
22 talking about paramedics, but police transported 19
23 gunshot victims to area hospitals that day, and 17 of
24 those 19 lived because of our training, because we had
25 tourniquets, because we had the equipment we needed,

1 and that's why to be accused of not training right and
2 not training rigorously and not being vigilant, it's
3 not accurate, sir.

4 Q. Did you, in addition to what you've explained
5 with your command staff, post some notorious event,
6 also see what was going on in the law enforcement
7 community as a result of those things by communication
8 with others in other agencies?

9 A. Always.

10 Q. So, for example, you mentioned the -- the
11 sit-down discussion, the analysis, after Pulse?

12 A. Yes.

13 Q. Did you learn that FBI and other sheriffs'
14 offices and other law enforcement agencies around the
15 country were essentially doing the same thing?

16 A. Yes.

17 Q. And is it ordinary as a part of your job as
18 sheriff to get a feel, get a sense, get an
19 understanding what thoughts and developments have the
20 larger law enforcement group figured out from this?

21 A. Yes.

22 Q. One of the previous witnesses mentioned that
23 after Fort Lauderdale airport -- Fort
24 Lauderdale-Hollywood shooting, BSO was asked to make a
25 presentation before some fairly significant national

1 groups. Do you remember that testimony?

2 A. I do.

3 Q. Did you participate in any presentations to
4 law enforcement organizations post Fort
5 Lauderdale-Hollywood Airport shooting?

6 A. I did. Myself and Colonel Jack Dale were
7 invited to the Major County Sheriffs' Association,
8 they have a conference the first week, and then the
9 National Sheriffs' Association, their conference
10 begins when the other one concludes in the same venue.
11 It was in Reno. And Colonel Jack Dale and I went out
12 to that conference post airport, and not only we were
13 students at the -- or members of the conference, but
14 we taught a -- I think a 90-minute block on what
15 happened at the airport, lessons learned, because most
16 major county sheriffs or national sheriffs are going
17 to have some airport in their jurisdiction. So it was
18 very applicable and it was very important that we
19 share that information.

20 Q. And in the process of that presentation and
21 that series of meetings, did you have give-and-takes
22 so you got questions from the participants,
23 suggestions, in essentially being a learning
24 experience for BSO, as well as for everybody else?

25 A. If you've ever been into these conferences,

1 there were quite a bit of questions. There was a lot
2 of dialog back and forth.

3 Q. Did anybody in those series of meetings when
4 you're making the presentation, suggest to you that
5 when there is an airport shooting, the immediate
6 response is to shut down the entire airport, no ifs,
7 ands or buts?

8 A. A lot of people think like that.

9 Q. And did you have some discussion there about
10 the practical realties of doing such a thing?

11 A. We did. And at that time, I knew how an
12 airport needs to get shut down and the protocols to
13 go -- you know, to go through it, but I -- my main
14 message was although no sheriff, to my knowledge, in
15 the country has the power to shut down an airport, we
16 can certainly be, you know, aggressive in a very
17 positive manner, letting the airport folks and the
18 folks nationally know that it's a safety issue and the
19 airport needs to be shut down until we say it's an all
20 clear, no fire in the hole, and we feel people can
21 move about safely.

22 Q. And is that a lesson learned from Fort
23 Lauderdale airport shooting?

24 A. Absolutely.

25 Q. And did it appear to you that it was a lesson

1 that was important for everybody to hear?

2 A. Absolutely.

3 Q. That the thought of how you go about shutting
4 down an airport was really not within then law
5 enforcement experience?

6 A. Correct.

7 Q. But yet you would work through that with the
8 FBI during the Fort Lauderdale-Hollywood Airport
9 incident?

10 A. That was less of a problem or an issue with
11 the FBI. In fact, it wasn't even an issue with the
12 FBI. That was more with the Broward County Airport
13 Division, and we worked through it in a very positive
14 manner, exchanging information --

15 Q. You and the FBI and BCAD --

16 A. Yes.

17 Q. -- worked through the issues?

18 A. Yes.

19 Q. Now, you mentioned that the first draft gets
20 reviewed and that was the normal course of how these
21 things are done?

22 A. Yes.

23 Q. And Captain Diefenbacher was assigned to do
24 the next series of reviews?

25 A. Yes.

1 Q. Did you assign him to that task?

2 A. I did not.

3 Q. Now, he's -- was a captain in the BSO when
4 you were the sheriff?

5 A. Yes.

6 Q. And he remains a captain in the BSO post
7 Sheriff Israel?

8 A. Yes. And I don't know if this was brought
9 out yesterday, but what was so important, the
10 undersheriff told me later to having Diefenbacher run
11 the next step was that he was also an attorney besides
12 being an accomplished police leader.

13 Q. And did you give direction to Captain
14 Diefenbacher what to do or how to do it?

15 A. Not at all.

16 Q. And Captain Diefenbacher goes through his
17 review process and rewriting. Was it your
18 understanding that once Captain Diefenbacher finished,
19 that's it, we have a final report?

20 A. No, sir.

21 Q. Is that how those things work?

22 A. No, sir.

23 Q. This final report, the offense incident
24 report, came out in I think November of 2017, October
25 or November 2017. So airport incident shooting,

1 January to say November, a 10-month period. For an
2 event of that magnitude, is that a reasonable amount
3 of time to do a complete offense incident report?

4 A. Quite reasonable.

5 Q. And when Captain Diefenbacher did his
6 processing, did you understand that it included an
7 evaluation of subject matter experts getting input
8 from different agencies, et cetera?

9 A. Well, I would have assumed that because I
10 know the kind of work that Captain Diefenbacher
11 produces, but I never had a conversation with him or I
12 was never apprised he was doing that.

13 Q. And you didn't look at his draft report?

14 A. No, I did not.

15 Q. And are you familiar with how many more
16 versions, edits, red lines, strike-outs, reviews
17 happened before it got to the critical incident
18 report, the final report?

19 A. I actually have no idea.

20 Q. And we looked at it yesterday, but just so
21 it's clear, the final report is Governor Exhibit 6,
22 and that's dated October 6, 2017?

23 SPECIAL MASTER: Sheriff, please say "yes" or
24 "no." The court reporter has a hard time with
25 nods.

1 THE WITNESS: Yes.

2 SPECIAL MASTER: Thank you.

3 BY MR. KUEHNE:

4 Q. Did the critical incident report, the final
5 incident report, become part of the materials that you
6 and BSO used when you made presentations on the Fort
7 Lauderdale-Hollywood incident?

8 A. Yes.

9 Q. And was it widely distributed?

10 A. Yes.

11 Q. Did you get any push-back from national law
12 enforcement circles that the critical incident report
13 wasn't complete, wasn't the right form, didn't have
14 enough criticisms in it?

15 A. Just the opposite. I know the undersheriff
16 had gone to at least three or four venues throughout
17 the country, and I might have had other colonels, I
18 can't specifically say, that went to locations. I
19 believe the undersheriff was actually invited to
20 Montreal as one of his stops to do a presentation of
21 what happened at the airport. And after one of the
22 presentations, I would get calls from the folks that
23 hosted the conference, thanking them for allowing
24 staff to go up there and make such a professional and
25 worthwhile presentation.

1 Q. Did the critical incident report emphasize
2 the importance of effective trainings?

3 A. Yes.

4 Q. And is that something that was encouraged
5 when presentations were made to other organizations?

6 A. Yes.

7 Q. Now, the governor's memorandum adds as
8 additional reason for your suspension for neglect of
9 duty and incompetence, this, and this is on page 7,
10 they say, "The report" -- referring to the final
11 report -- "never acknowledges failures on the part of
12 Israel or BSO. Rather, as highlighted above, the
13 final report claims you cannot prevent or prepare for
14 this type of event, and that through the leadership of
15 Sheriff Israel, the event was mitigated and the scene
16 was secured and handled."

17 You remember that part of the governor's
18 memorandum?

19 A. Oh, very well.

20 Q. Now, isn't it accurate to say that the
21 governor's memorandum truncates and selectively
22 identifies portions of the report and takes them out
23 of context?

24 A. Yeah. We used the word "cherry-pick" when we
25 spoke.

1 Q. Doesn't the report actually say -- and I'm
2 quoting -- "Through the leadership of Sheriff Israel,
3 BSO personnel, the FBI, BCAD, and other law
4 enforcement agencies, fire rescue, regional
5 communications, and community partners, this tragic
6 event was mitigated and investigated in an
7 extraordinary manner"?

8 A. That's exactly what it said, and that's why I
9 just -- you know, I realize I stay in my lane and I'm
10 only the sheriff of one of many counties in the state,
11 and the power of a governor far surpasses that of a
12 sheriff, but that is the reason I just shake my head
13 that how could I not be called to a conference with
14 the governor to explain these things to him. Governor
15 Scott and I sat in an office and we went over as much
16 detail as we could of what happened. But to be
17 suspended and be called incompetent and not even have
18 the chance to explain what actually happened. I was
19 there. I left -- I was running an obstacle course in
20 the park that day, it was my day off, and I went to
21 the airport. I got there about an hour and a half
22 later and stayed for maybe 12 hours. I just wanted to
23 share what my observations were, what I did.

24 Q. The -- I mentioned when I was reading the
25 governor's memorandum it says -- and the memorandum

1 says, "The final report claims you cannot prevent or
2 prepare for this type of event." Doesn't the report
3 itself say the following: Not you cannot prepare for
4 this type of event, but doesn't the report actually
5 say, "there is no way to prevent this tragedy or to
6 prepare completely for the amount of unique obstacles
7 that had to be overcome in a very short period of
8 time"?

9 A. That's --

10 Q. Isn't that what the report says?

11 A. That's exactly what it --

12 Q. And is that an accurate observation in the
13 report?

14 A. Yes, it is.

15 Q. Did you say, as the governor claims, you
16 cannot prevent or prepare for this type of event?

17 A. That was never said. It's an absolute false
18 statement.

19 Q. In fact, doesn't the report conclude that you
20 can prepare for it, you just can't prepare completely
21 for the amount of unique obstacles that had to be
22 overcome in a very short period of time?

23 A. Yes, and we had that conversation, and what
24 the undersheriff was saying in that report is even in
25 training, at the airport we found that day there were

1 approximately -- the airport aviation division said
2 there were approximately twenty to twenty-two thousand
3 people that were either on planes, in turnstiles, or
4 somewhere within the proximity of that airport.
5 There's really no way to re-create training and
6 experience 20,000 people running haphazardly. That's
7 what they were trying to say, that you can't
8 completely prepare for that type of event, but you can
9 plan, you can prepare, and we did.

10 Q. Did BSO as part of its pre-Fort
11 Lauderdale-Hollywood training and its post Fort
12 Lauderdale training try to prepare officers to prepare
13 for the unexpected?

14 A. Yes, we did.

15 Q. Is that an important part of law enforcing?

16 A. One of the most fundamental parts of law
17 enforcement.

18 Q. The Marjory Stoneman Douglas tragedy happened
19 February 14, 2018?

20 A. Yes.

21 Q. BSO had an agreement with Broward County
22 Schools to staff a certain number of schools with an
23 SRO, school resource officer?

24 A. That's correct.

25 Q. Marjory Stoneman Douglas was one of them?

1 A. That's correct.

2 Q. And the agreement specified that a school
3 resource officer would be assigned to that school?

4 A. Yes.

5 Q. And then the agreement had other schools
6 assigned an officer?

7 A. Yes.

8 Q. The officer assigned was former Deputy Scot
9 Peterson?

10 A. Yes.

11 Q. Did you have any role in his assignment to
12 that location?

13 A. No.

14 Q. Did the Broward County Schools have input
15 into evaluating what they thought of their SRO
16 assigned to the schools?

17 A. Yes.

18 Q. And had SRO Peterson been at Marjory Stoneman
19 Douglas for some period of time before that mass
20 tragedy?

21 A. Quite some time.

22 Q. And he had been an SRO for a lot of years?

23 A. He had been an SRO for a lot of years, he was
24 considered a very good SRO, and I think he was --
25 might have been selected as SRO of the year, and he

1 actually taught some of the courses on how a school
2 resource officer should react to an active killer
3 situation.

4 Q. You're aware that he did, in fact, teach
5 Broward County personnel in how to respond to an
6 active shooter situation?

7 A. I do know that.

8 Q. Now, as you understand, you understand some
9 of what goes into training non-law enforcement into
10 responding to an active shooter situation?

11 A. I do.

12 Q. That's different from the active shooter
13 policy, 4.37, of Broward Sheriff's Office?

14 A. Yes. The fundamental premise of the training
15 is completely different.

16 Q. But SRO Peterson was nonetheless a trainer
17 for Broward schools personnel?

18 A. Absolutely.

19 Q. And you understand that -- now that SRO
20 Peterson actually met with and worked with people at
21 that school, at Marjory Stoneman Douglas, at the
22 beginning of the school year and other times during
23 the school year to essentially practice or get ready
24 or be aware of?

25 A. I do know that now.

1 Q. And that one of the responsibilities of SROs,
2 as you understand it, is as events unfold, if there's
3 something that needs to be imparted to school
4 administration, the SRO has the ability to do that?

5 A. He does.

6 Q. And BSO on its own, not through the SROs,
7 regularly communicates threats, issues of concern,
8 other incidents to the school system?

9 A. That's correct.

10 Q. And that's done as a matter of conserving the
11 peace in Broward County?

12 A. Exactly.

13 Q. And is there -- let me ask you this: You
14 became -- you were elected sheriff in November of
15 2012?

16 A. Yes.

17 Q. And then became sheriff. You were sworn in
18 in early 2013?

19 A. January.

20 Q. January 2013.

21 During -- what was one of the first projects
22 you instituted upon becoming sheriff in January of
23 2013?

24 A. I think when I -- the first SWAT commander
25 that I -- well, first individual I made SWAT commander

1 when I came over was Lieutenant Colonel Michael
2 DiMaggio. Mike is a consummate professional, lives,
3 eats and breathes SWAT, and the first meeting I had
4 with Mike, I told him I wanted a full-scale school
5 active shooter scenario. I told him it was a
6 priority. I told him it wasn't going to be able to be
7 done with it within a week or a month because of all
8 the work that was going to go into it. And then I
9 believe a few months later at Pompano Beach High
10 School in Broward County, we had one of the most
11 comprehensive full-scale trainings I've ever been a
12 part of. We actually had helicopters allow SWAT team
13 members to repel into the school to -- if students
14 were shot and injured in upper classrooms, so they
15 entered in through upper classrooms. In the scenario,
16 there was an active killer, still uncaptured. And
17 we -- incredible training. We repelled a K-9 dog down
18 off the helicopter into those upper classrooms so that
19 the K-9 dog could search out the killer. There were
20 so -- we had fire -- Pompano Beach has their own fire
21 department. We just do police. So Pompano fire was
22 there. They did an incredible job. And so many
23 different units and components came together. It was
24 a complete day-long training, and I want to say there
25 were about 200 to 300 students who volunteered their

1 times to be victims, observers, students.

2 Q. I want you to take a look at Israel Exhibit
3 29, and that's Israel Bates No. 2139. Is this an
4 accurate article in a police newsletter about the
5 Pompano Beach High School active shooter training?

6 A. It is.

7 Q. You've read it before?

8 A. I have.

9 Q. And does it explain the complexity and
10 involvement of so many different people, including
11 Broward County Schools?

12 A. It does.

13 Q. Is that an easy exercise to organize?

14 A. It's probably one of the more complex
15 trainings to organize that you will have.

16 Q. DiMaggio was your SWAT captain -- was he a
17 major?

18 A. Major.

19 Q. Major DiMaggio was your SWAT captain, and he
20 was overall in charge of this?

21 A. He was overall in charge of this with -- the
22 SWAT captain was Captain Ed Grant.

23 Q. Were you called upon in your position as
24 sheriff to pick up the phone, make a request, to use
25 your official status to get the school board to help

1 you accomplish this?

2 A. Yes. I actually had direct calls with the
3 school superintendent, Robert Runcie, who was very
4 cooperative and very willing to work with me on this
5 endeavor.

6 Q. Nothing like this had ever before been done
7 in Broward County, had it?

8 A. Not to my knowledge.

9 Q. Are you aware of anything like this having
10 been done in South Florida?

11 A. I'm not.

12 Q. Did this real-life, large-scale, active
13 shooter at a school scenario become looked at by other
14 law enforcement officers around the country?

15 A. I got quite a few calls on the training.

16 Q. Did you send other law enforcement officers
17 and offices around the country the material and the
18 backup to help them develop such a preparation?

19 A. I believe Lieutenant Colonel DiMaggio did
20 just that.

21 Q. Was it your understanding that law
22 enforcement around the country was actually surprised
23 that such a full-scale scenario could be -- could be
24 implemented?

25 A. Yeah, I remember one time Lieutenant Colonel

1 DiMaggio coming into my office and saying -- I said,
2 "How's it going with the -- with, you know, our
3 brothers and sisters in law enforcement?" He goes,
4 "The one question I get asked, Sheriff, is how did you
5 guys pull that off?" So it was appreciated. I think
6 law enforcement around the country appreciated the
7 efforts that we had to go through to even bring this
8 training to Pompano.

9 Q. And how about within BSO? Did having this
10 full-scale active shooter scenario in a school help
11 emphasize the importance of protection of our very
12 vulnerable child population?

13 A. Yes, and I think, you know, through -- the
14 men and women in the agency have heard me campaign,
15 they know that -- with all the hats I wear, they know
16 that the most important hat I wear is that of dad. I
17 have triplets, two boys and a girl. I coach the boys
18 throughout every sport they play, coached other kids
19 in the community, coached at two different high
20 schools, and just my whole essence of becoming sheriff
21 was to make Broward County a better place for kids.
22 So I think that sent the message. They knew that
23 already, and then when they saw the first mass
24 training we're doing is at a high school, I think I
25 set -- I think it set the tone for the agency that the

1 safety of children is going to be preeminent
2 responsibility for us during Sheriff Israel's
3 administration.

4 Q. Since that time, since that active shooter
5 training, did you detect any complacency or
6 *laissez-faire* attitude among any deputies when it came
7 to situations like school incidents?

8 A. I've never witnessed it, no.

9 Q. Did you sense any complacency among SROs that
10 they're just there to be glorified security guards, no
11 big deal?

12 A. Just the opposite. I went to countless
13 schools, and our SROs were -- they were exuberant,
14 they were excited to be there, and the reason I know
15 they enjoyed being there is because the principals of
16 those schools, when I do these walk-throughs and stop
17 to do readings with kids or stuff like that, the
18 principals were complimentary of the men and women
19 that we had assigned to the school. So I know that
20 our leaders selected the right people to be in our
21 elementary and middle and high schools.

22 Q. When it came to the SRO selection at BSO,
23 somebody has to apply or invite themselves to be an
24 SRO candidate?

25 A. Correct.

1 Q. Is the BSO philosophy of selecting the
2 appropriate candidate to look for experienced
3 deputies?

4 A. It's to look for putting a round plug in a
5 round hole. I tell the folks that select their units:
6 Don't have any preconceived notions, don't have
7 anybody first on the list or last on the list, let the
8 folks come in, let them interview fairly, and just
9 because a person might have come in fifth when they
10 put in for a burglary job doesn't mean they won't be
11 first for an SRO job. So I said be open-minded, know
12 what dimensions and disciplines you're looking for,
13 and pick the person that is most likely going to give
14 you what you're looking for and be able to serve the
15 public and make that presentation.

16 Q. As you understand it, as part of the SRO
17 overall responsibility, did the SROs work with the
18 schools' personnel to essentially inventory the
19 schools, get a sense of what the physical plant is?

20 A. Yes.

21 Q. Offer suggestions on safety and security?

22 A. Yes.

23 Q. Who ultimately, though, was responsible for
24 the operation of the physical plant?

25 A. Of the school?

1 Q. Of the school.

2 A. Superintendent.

3 Q. So the -- the governor criticizes you and BSO
4 that at Marjory Stoneman Douglas High School the day
5 of the incident, there were several entryways into the
6 school. Do you remember that criticism?

7 A. I do.

8 Q. Is there some uniform law passed by the State
9 of Florida that requires at high schools, a single
10 entrance that you know of?

11 A. No, not that I know of.

12 Q. Is there any Broward County ordinance or
13 school board policy that you know that says all high
14 schools have to have one in, one out?

15 A. No.

16 Q. Has the BSO encouraged the Broward County
17 Schools to limit access in and out of schools --

18 A. Yes.

19 Q. -- all schools?

20 A. Yes.

21 Q. And do you understand that to be a dialog,
22 BSO is looking for safety first, but the school system
23 has a lot of factors that it has to put in?

24 A. Yes. One particular example, we heard a
25 witness testify yesterday that when school personnel

1 were feverishly trying to track the killer's
2 movements, they rewound the camera a certain way, and
3 when they were giving out what they thought was
4 real-time intelligence to police, it was actually
5 about 20 minutes behind. So I knew that was something
6 that needed to be fixed, and for almost a year I had
7 conversations, fervent conversations, with the school
8 superintendent, and our staff had conversations with
9 his staff, and I wanted to make sure that if a
10 critical incident occurred, we as police could take
11 over without asking anyone for permission, complete
12 autonomy of the cameras that existed in schools
13 throughout Broward County. There was no time to call
14 up and ask for permission or get a phone call. We
15 just want to be able to flick a switch. And the
16 school board, I understand that they had legal issues
17 and their attorneys were worried and concerned about
18 some things regarding the rights of privacy and the
19 rights of students, and we had these discussions, and
20 shortly before the governor suspended me, we signed a
21 memo of understanding that at the time I left office,
22 we had access to cameras immediately, and that was
23 something very -- very important and something that we
24 worked feverishly on.

25 Q. Take a look at Exhibit 24, which starts at

1 Israel 1923. It's actually two documents in one. One
2 document is dated January 8, 2019. That's the first
3 document. And the second document is February 19,
4 2019. So during your tenure and after your tenure.

5 A. Okay.

6 Q. Is this apropos of the negotiation leading to
7 improvements in camera access from the Broward County
8 School Board to the BSO?

9 A. Yes.

10 Q. Did you get involved at that high level of
11 discussions, or was this done at levels below you?

12 A. I got involved.

13 Q. Do you get involved in all discussions and
14 negotiations with the school board and other
15 governmental entities?

16 A. Not at all.

17 Q. How do you decide when to get involved and
18 not?

19 A. Based on the nature of importance and based
20 on what -- when I think it's time for me to get
21 involved. You don't want to -- from a leadership
22 perspective, you don't want to pull things away from,
23 you know, the men and women you work with when they're
24 working on something and they're working to accomplish
25 something. But I know when I need to be involved, and

1 when I feel I need to be involved, I get involved.

2 Q. The governor's memorandum also criticizes
3 you, the BSO, that the SRO at Marjory Stoneman Douglas
4 was not actually carrying his rifle at the time he was
5 acting as SRO and had to go get the rifle. Do I
6 understand that?

7 A. Yes.

8 Q. Is that a fair criticism?

9 A. Of me?

10 Q. Of the process.

11 A. No.

12 Q. Have you had discussions at your level where
13 the Broward County Schools' response to you is
14 effectively our schools not armed camps?

15 A. Yes.

16 Q. We don't want to have a military operation
17 daily at our schools?

18 A. Yes.

19 Q. We want to encourage schools and children to
20 have a healthy respect for police?

21 A. Yes.

22 Q. And we want our SROs to be the kind of SROs
23 who essentially can help our kids feel good about law
24 enforcement?

25 A. Yes.

1 Q. And do those goals sometimes conflict a
2 little bit with a law enforcement goal of we want to
3 make sure we can do everything to limit the ability of
4 things to happen?

5 A. Of course, they conflict. One school -- I
6 don't know if it was a teacher or principal, but one
7 school person once told me about their SRO, that I
8 want the SRO to be a combination -- what makes him or
9 her so good is they're a combination of Santa Claus
10 and the Easter bunny. And, you know, you like to hear
11 things like that, but sometimes when a person has the
12 personality to be Santa Claus and the Easter bunny,
13 they're not going to turn in to be a Navy SEAL. It
14 doesn't -- you know, people have different
15 personalities, different skill sets, but yes to your
16 question.

17 Q. So when you hear a principal saying "Easter
18 bunny, Santa Claus," is the BSO response "Yes, but
19 he's a deputy"?

20 A. Yes.

21 Q. So is that -- do you trade off the friendly
22 Easter bunny/Santa Claus in lieu of being a law
23 enforcement officer?

24 A. No, there's no trade-off. You bring over
25 highly-trained school resource deputies that are

1 qualified, that want to be there, that the schools
2 want them there, and you give them the training
3 that -- you know, that as a sheriff, I'm obligated to
4 give them, you provide them with the policies and
5 procedures. But no matter what, the governor's
6 attorney says at any time. If they think I can
7 provide any woman or man on this earth with courage
8 and the desire to go inside when their conscience is
9 telling them I'm not going in there, there's no
10 sheriff, there's no police leader, there's no football
11 coach or there's no general that's going to get
12 someone to go in when the human element takes over and
13 they say to themselves "I'm not going in."

14 Q. Did you have any reason to believe on
15 February 14, 2018, that then SRO Peterson would not
16 immediately or promptly go in?

17 A. Had I had that knowledge, I would have
18 removed him as a deputy.

19 Q. Did you have any knowledge?

20 A. No, sir, not at all.

21 Q. Have you since looked at his personnel file
22 to see if there's anything that indicates an unfitness
23 for service or lack of knowledge of the training?

24 A. I have. It has been shown to me, yes, and --

25 Q. Is there anything like that?

1 A. Absolutely not.

2 Q. But does his report reflect significant
3 active shooter course participation?

4 A. Yes.

5 Q. Now, BSO, in addition to the contract with
6 the school system to provide SROs, also helps the
7 school system with issues of law enforcement, safety,
8 security, including planning?

9 A. That's correct.

10 Q. And there's a part of the Broward County
11 Schools that's their law enforcement unit called
12 special investigative unit?

13 A. Yes.

14 Q. You're familiar with that. That's like their
15 police department, but it doesn't do a full policing
16 job, like, for example, the Dade County School Board
17 has their own police force that actually polices their
18 schools?

19 A. You're talking about one agency that has
20 thousand employees and one that just has maybe 30 or
21 40.

22 Q. Okay. So does the BSO help facilitate
23 training programs for the Broward County Schools law
24 enforcement unit?

25 A. Yes.

1 Q. I'm going to hand you Exhibit 31. Let me
2 just find the right page. Israel Exhibit 31, starting
3 at page Israel 2849.

4 A. I'm familiar with it.

5 Q. That's a January 2018 -- January 2018 seminar
6 at the Broward County Schools, correct?

7 A. Yes.

8 Q. And that deals with their special
9 investigations law enforcement function?

10 A. Yes.

11 Q. Did BSO assist in preparation for that
12 seminar?

13 A. Yes.

14 Q. Did BSO provide personnel for presentation at
15 the seminar?

16 A. Yes.

17 Q. Did BSO discuss with Broward County Schools
18 at that seminar, security issues, including security
19 policies?

20 A. Yes.

21 Q. And is that a regular occurrence?

22 A. Yes.

23 Q. Now, that was, sadly, a month before the
24 Marjory Stoneman Douglas massacre?

25 A. Yes.

1 Q. Was there any part of that training, that
2 seminar, that report, that in any way led to a lax of
3 security at any of the schools, including Marjory
4 Stoneman Douglas?

5 A. No.

6 Q. Was it instead part of the effort of
7 coordination between BSO and Broward schools to
8 enhance safety of the children in the schools?

9 A. Certainly.

10 Q. Did anybody at that seminar clamor, demand
11 that BSO conduct another full-scale at a school, high
12 school or any school, active shooter/killer scenario?

13 A. I wasn't at the seminar, but when Colonel
14 Polan briefed me on it, he never mentioned anything
15 like that being brought up.

16 Q. And Colonel Polan is one of the command
17 officers?

18 A. Yes, he is. He was in charge of the
19 Department of Law Enforcement.

20 Q. But didn't he discuss with you that some of
21 the people remembered and were aware of that
22 large-scale active shooter scenario?

23 A. He certainly did.

24 Q. That from 2013 to 2018, it was still fresh in
25 some people's minds, as far as Colonel Polan had

1 explained to you given the dialog and discussion?

2 A. Correct.

3 Q. We've heard much testimony that the response
4 of SRO Peterson was a failure, correct?

5 A. Correct.

6 Q. Do you agree?

7 A. Yes.

8 Q. And was it immediately evident, immediately
9 in the aftermath, that Deputy Peterson had so failed
10 to discharge his responsibilities?

11 A. Absolutely not.

12 Q. It took some time?

13 A. Yes.

14 Q. And you're aware that Deputy Peterson in his
15 SRO capacity did call for a code red at the school?

16 A. Yes.

17 Q. Now, that's -- means something, right?

18 A. To the school.

19 Q. To the school. It's a system in the school
20 that a code red essentially shuts down the school
21 in -- not preparation for, but in response to a likely
22 major incident?

23 A. Correct.

24 Q. And that establishment of a code red for the
25 school and the implementation is something that was

1 worked through between BSO and Broward County
2 Schools --

3 A. Correct.

4 Q. -- to develop that process?

5 A. Yes.

6 Q. And that code red process was initiated by
7 SRO Peterson?

8 A. Yes.

9 Q. He, however, didn't follow the training, the
10 policy of 4.37, active shooter?

11 A. He did not.

12 Q. Now, that policy -- and we've heard lots of
13 discussions about it. That policy, you're familiar
14 with, but I'll give you a copy of it. Exhibit 1,
15 Bates Israel 1.

16 You had involvement in the development of
17 that policy?

18 A. I did.

19 Q. Generally explain how that policy -- strike
20 that.

21 Was the review and development of that policy
22 into that version of 4.37 part of a regular policy
23 review process?

24 A. Yes.

25 Q. Did you have at BSO an established process

1 for policy review and evaluation?

2 A. Yes, we did.

3 Q. Did it include involvement by Executive
4 Director Pusins?

5 A. Yes.

6 Q. And is that because of his national expertise
7 in police practices and policies?

8 A. Clearly.

9 Q. Did it include not just high-level rank
10 officers, but also -- I'll call them on the ground --
11 boots on the ground officers?

12 A. Yes. One of the things that Colonel Polan
13 and I used to talk about all the time is when
14 developing policies, make sure we're not only having
15 discussions with command staff, but the ultimate boots
16 on the ground, the user of those policies. I'm a
17 user-friendly sheriff. I wanted input from the folks
18 that are going to actually carry out through those
19 policies and hear what they have to say. So they were
20 always used in the development of those policies.

21 Q. Did the development of that policy include
22 reviewing the literature out there, meaning in law
23 enforcement circles, on such policies?

24 A. From my perspective, it did because I would
25 always read policies, as did most of the -- if not all

1 of the command staff.

2 Q. And was that the process used?

3 A. Yes.

4 Q. Did -- you knew at the time that the State of
5 Florida, FDLE, and the Justice Training Standards
6 Commission had no requirement for an active shooter
7 policy?

8 A. I did know that.

9 Q. And did you know at the time that some
10 sheriffs' offices didn't have any policy whatsoever?

11 A. No, I did not know that.

12 Q. You've since learned that?

13 A. Yes.

14 Q. And did you understand that policies in
15 Florida were looked at to try to compare and contrast?

16 A. I actually looked at some.

17 Q. In addition to you, did the team look at
18 others?

19 A. Yes.

20 Q. And was the development of that policy in the
21 language used consistent with model policies?

22 A. Yes.

23 Q. Consistent with standard practices in law
24 enforcement?

25 A. Yes.

1 Q. Inconsistent in any way with desirable or
2 desired active shooter policies?

3 A. It was completely in line with desired active
4 shooter policies.

5 Q. It was in place, revised in 2016?

6 A. It was.

7 Q. And from 2016 to February 14th of 2018, was
8 there any criticism about that policy?

9 A. None at all.

10 Q. Within law enforcement circles?

11 A. No.

12 Q. How about outside law enforcement circles,
13 like among politicians?

14 A. No, nobody criticized it. Matter of fact,
15 the policy -- as a reader, when I had input in that
16 final policy in 2016, I read many of the policies --
17 many of the policies in Florida and throughout the
18 country, and I didn't reinvent the wheel, I didn't
19 create my own policy, I didn't author some -- you
20 know, have some magic mantra and author some policy.
21 I read quite a few policies, and then we worked to
22 tailor our policy to what we thought was a compilation
23 of getting the best policy we could that sent the
24 message to our deputies how we wanted them to respond
25 and how we expected them to perform.

1 Q. And what -- when that policy was up to final
2 approval, did you give final approval?

3 A. I did.

4 Q. Was the general counsel for the Broward
5 Sheriff's Office a participant in discussions
6 regarding the formulation of that policy?

7 A. He was.

8 Q. And that was Ron Gunzburger?

9 A. Yes.

10 Q. Did he have extensive experience in legal
11 matters involving law enforcement?

12 A. Yes.

13 Q. He had been general counsel for quite some
14 time?

15 A. Six years.

16 Q. So the policy gets approved, and now we know
17 post Marjory Stoneman Douglas tragedy that the "may"
18 word has been singled out and criticized and used by
19 the governor as a reason to say you neglected your
20 duties and were incompetent. You understand that?

21 A. Yes.

22 Q. Is there any part of that policy that led to
23 or caused deputies, as you understand the training, to
24 hesitate, to take no action in the face of an active
25 shooter?

1 A. Absolutely not.

2 Q. What do you understand the training -- strike
3 that.

4 You were not a trainer?

5 A. No.

6 Q. Did you go to trainings?

7 A. I did.

8 Q. Did you go to active shooter trainings?

9 A. I would go into different ones at different
10 times. I've went to quite a few, not for the whole
11 day, but different trainings for different segments.

12 Q. And is that part of your role as sheriff, to
13 be visible among the line troops?

14 A. Absolutely.

15 Q. To know what's going on?

16 A. Absolutely.

17 Q. Not just sit in an office and get a report
18 going up?

19 A. No.

20 Q. You were sheriff, would you go on occasion
21 with road patrol to see what they're doing?

22 A. I would go -- I wouldn't go in the car with
23 another deputy, but I rode with a deputy constantly,
24 Deputy Conroy, and if an officer needed backup or we
25 needed to do a traffic stop, we would do -- or help

1 out in any way. Not only BSO, but if we could back up
2 a Florida highway trooper on the road or back up a
3 police officer in another city in Broward County,
4 they -- you know, sheriff's here to back me up, you
5 know. So we were cops.

6 Q. As a career law enforcement officer, boots on
7 the ground never leaves you?

8 A. Never leaves you.

9 Q. So -- by the way, were you aware of any
10 federal legislation by the Congress that required
11 active shooter training for large law enforcement
12 agencies?

13 A. I'm not aware of any, no.

14 Q. Were you aware of any proviso set by the
15 Congress that said if you're getting federal grant
16 money, you have to have active shooter training or
17 active shooter policies?

18 A. There was no industry standard for active
19 shooter training.

20 Q. And no congressional mandate?

21 A. No congressional mandate.

22 Q. Broward sheriff got federal funds --

23 A. Yes.

24 Q. -- or grants, right?

25 A. Yes.

1 Q. And did Broward Sheriff's Office comply in
2 every respect with the requirements of those grants?

3 A. Yes.

4 Q. Now, you may not be aware of this, maybe you
5 are, but before the governor became governor, he was a
6 member of Congress, right?

7 A. Yes.

8 Q. Are you aware of anything that he did as a
9 member of Congress to require active shooter policies
10 to be implemented by law enforcement circles?

11 A. I'm not aware of anything, no.

12 Q. Nothing?

13 A. Nothing.

14 Q. What was your -- what is your understanding
15 of the training on the active shooter policy? What
16 are officers trained to do in pursuance of that active
17 shooter policy?

18 A. Well, I witnessed it, so I know what the
19 training was because I had influenced my will on the
20 training.

21 Special Master, you've heard a lot about
22 "may" and "shall," and you'll read it all yourself and
23 come to your own conclusions, but I tell you it's a
24 red herring. I've read hundreds of policies with
25 "may" and hundreds of policies with "shall," and they

1 say the same thing.

2 The purposes of the policy is to give the
3 officer discretion not to go into a suicide mission.
4 If your child was inside a school, you'd want an
5 officer to go in, but you want him to go in alive so
6 he can do what he was trained to do, and that's
7 eliminate the threat to the student, to the citizen.

8 And the policies you read, you'll read on
9 "shall." It says "shall," and then it says a comma,
10 "when reasonable information." Well, when I told my
11 kids you shall do something, I didn't give them a
12 caveat with a comma. I said "You shall be home by
13 11:00." Whenever there's that comma and there's that
14 caveat, "shall" and "may" are the same. All lawyers
15 in Broward County that have spoke to me say they're
16 exactly the same. It's a red herring.

17 Our training told our deputies you will go in
18 as soon as you possibly can through the closest
19 entrance. Barring a booby trap door or gunfire coming
20 through that doorway, you will go in, you will push,
21 you will engage, you will eliminate the threat,
22 whether it's through using lethal force, apprehending
23 the individual, surrender, having the individual flee.
24 But our training was specific, you will pursue, you
25 will enter, and you will take that person into custody

1 as soon as is humanly possible, with no exceptions
2 other than developing intell or witnessing or seeing
3 or hearing something that says it's life-threatening
4 for me to go in here this second. Not to enter into a
5 life-threatening situation, we must do that, but to
6 open this door like the hero in Thousand Oaks,
7 California, did a few months ago when that sergeant
8 was killed going through a door in an active shooter
9 situation. That's what may -- that's what I was
10 trying to prevent, that's what I am trying to prevent.
11 That's why we went with the policy, "may." It's a red
12 herring.

13 Q. Was it your demand in developing the 4.37
14 policy to make sure all of your people agreed that you
15 wanted "may" in there and it was going to go in there
16 whether it was consistent or inconsistent with
17 national standards?

18 A. No, it was -- first of all, I would never do
19 anything that was inconsistent with national
20 standards. It was quite consistent with national
21 standards. It was -- it's shared by hundreds and
22 hundreds of law enforcement agencies around the
23 country. And the command staff understood that, and
24 we -- as one. I take full responsibility for the
25 word, I take full responsibility for the institution

1 of policy, but there was a lot of support.

2 Q. Now, the governor contends in his memorandum
3 to the Special Master that SOP 4.37 goes against
4 accepted practices. Do you remember that as part of
5 his argument?

6 A. I do.

7 Q. Is there any validity to that whatsoever?

8 A. No validity. It's a fictional statement.

9 Q. Does 4.37, as written in Exhibit 1 and as
10 trained, act entirely consistent with accepted
11 practices?

12 A. Absolutely does.

13 Q. Is it consistent with national standards?

14 A. It absolutely is.

15 Q. Is it consistent with what goes on in the
16 State of Florida?

17 A. It certainly is.

18 Q. Is it consistent with the policies of the law
19 enforcement agencies that are certified by the Florida
20 Department of Law Enforcement?

21 A. It surely is.

22 Q. The governor also contends in that same
23 argument that the policy is "wholly inadequate and
24 insufficient." Do you have a response for that?

25 A. As the kids text, SMH, shaking my head. If

1 he only understood how many policies -- tried and
2 tested policies state just that, appropriately so.

3 Q. And you've mentioned that you were never
4 given an opportunity to explain any of that policy to
5 him?

6 A. Never.

7 Q. And since you've been suspended as sheriff,
8 have you kept up on FDLE standards, accessing the
9 website, seeing what they do and say?

10 A. I have not.

11 Q. Now, the governor, also in an effort to claim
12 neglect of duty and incompetence, asserts that two of
13 your deputies, Deputy Eason and Treijs, had
14 interactions with the shooter --

15 A. Uh-huh.

16 Q. -- and were later disciplined, and had those
17 interactions been done properly, the governor claims
18 the shooting would never have occurred. You
19 understand that argument --

20 A. Yeah.

21 Q. -- the sheriff makes?

22 Now, my question is meant respectfully
23 because many lives were lost that day.

24 A. Uh-huh.

25 Q. Lives for which -- do you grieve for those

1 lives?

2 A. Every day. A lot of people don't know this,
3 but our house that we used to live in for 20 years, we
4 raised our kids in, was between the two schools, West
5 Glades Middle School and Parkland. You can see
6 Stoneman Douglas from my back yard. My triplets went
7 to Stoneman Douglas. I'll never -- I wish I could see
8 -- it's indelible in my mind. I wish I could forget
9 it. I never will, but when I walk through the crime
10 scene, not only was I grieving and emotional about
11 what I saw, but thinking how my kids could have been
12 sitting at those desks a year or two earlier. It was
13 a terrible, terrible, terrible situation.

14 Q. As a person and as the sheriff, have you
15 shared that grief with survivors of MSD?

16 A. Yes.

17 Q. Do either of the incidents, the Eason
18 incident and the Treijs -- let me change that from
19 "incident" -- interactions.

20 Do either of those interactions, Eason and
21 Treijs, that are used as accusatory comment by the
22 governor have anything to do with whether the shooter
23 would have been on the streets on February 14, 2018?

24 A. Not one thing.

25 Q. Do either of those events involve criminal

1 activity on the part of the shooter that would have
2 resulted in, under any scenario, his arrest --
3 apprehension and arrest?

4 A. Absolutely not.

5 Q. Do you -- you were not involved in the
6 discipline of those two officers, were you?

7 A. Well, to the point where I -- discipline, as
8 always, goes through me. The colonel will always
9 bring the final discipline to me.

10 Q. It ultimately goes to you --

11 A. Ultimately.

12 Q. -- but there's a process --

13 A. Yes.

14 Q. -- for determining discipline?

15 A. Yes.

16 Q. It's not Sheriff Israel snapped his fingers,
17 you're fired, you're demoted, you're this, you're
18 that?

19 A. No.

20 Q. And that process is, as far as you know,
21 always followed within the BSO?

22 A. Yeah, I mean, I completely respect it, honor
23 the law, and I honor the collective bargaining
24 agreements. So there are collective bargaining
25 agreements and the law and rights of those accused,

1 and we're always cognizant of those things.

2 Q. And not in any way intending to diminish or
3 demean the requirement to follow the rules, what do
4 you understand the rule violations were that led to
5 these two officers being disciplined?

6 A. It's my understanding that they did not
7 completely document or contact as fully as they should
8 have, and one of the deputies, it was his second
9 offense, so he received a more severe discipline than
10 the other deputy. But there were no risk protection
11 orders in effect at the time. There were no weapons
12 seen. They never even saw the killer. There were
13 no -- they wouldn't have been able to arrest him or
14 charge -- it was nothing like that. It was just
15 the -- they should have done more documentation.

16 Q. So on February 5, 2016, Deputy Eason received
17 a report of a student Instagram with a gun and the
18 words "I'm going to shoot up the school." Is that
19 what you understand the Eason matter to be?

20 A. Yes.

21 Q. And he did not report that in an incident
22 report, just a note?

23 A. Yes.

24 Q. And the nature of the computer system at the
25 BSO is that incident reports get categorized one way

1 and are searchable, and notes don't rise to the level
2 of a searchable incident?

3 A. That's correct.

4 Q. So if you're typing in the name of a suspect,
5 you would link to all the offense/incident reports
6 that show up for that?

7 A. That's correct.

8 Q. But a note is not automatically connected?

9 A. That's correct.

10 Q. It's only connected once you look at
11 information and essentially drill down to see the
12 note?

13 A. That's correct.

14 Q. So Eason was disciplined that he should have
15 done an incident report?

16 A. That's correct.

17 Q. And you ultimately approved that discipline?

18 A. Yes.

19 Q. Now, on November 30, 2017, Deputy Treijs --
20 by the way, you were not aware of Eason's failure to
21 report in real time?

22 A. I had never even heard his name before.

23 Q. The deputy's?

24 A. Correct.

25 Q. Are there that many deputies you don't know

1 each of them individually?

2 A. Well, we have 6,000 people on the agency and
3 approximately 1,800 deputies. It's really impossible
4 to know everybody with that large an agency.

5 Q. Deputy Treijs on November 30, 2017, received
6 a report -- a call that a shooter had weapons and
7 wanted to kill people, and he directed the caller to
8 another police department because the person who was
9 calling was for Palm Beach, had no idea where the
10 individual was, and no immediate information about the
11 individual?

12 A. Right.

13 Q. And Deputy Treijs wrote, "Note, the person is
14 described as autistic and no current information"?

15 A. That's correct.

16 Q. And Deputy Treijs was reported for not fully
17 making that an incident report?

18 A. That's correct.

19 Q. And was disciplined appropriately as far as
20 you approved?

21 A. Yes.

22 Q. Now, did you have information on November 30,
23 2017, that somebody had reported this information to
24 Deputy Treijs?

25 A. No.

1 Q. Was --

2 A. Counsel, let me just add -- I think this is
3 important -- we get approximately almost 750,000 calls
4 for service a year. It's not logical to think that a
5 sheriff would be apprised of calls for service. I
6 mean, how would that -- it's just not fathomable.

7 Q. Is that in the ordinary handling of a
8 sheriff's office, that there are means and priorities
9 to get matters to your attention?

10 A. Exactly.

11 Q. But is the training that you oversee and
12 implement designed to appropriately train your
13 officers to handle things correctly?

14 A. Exactly. Yes, sir.

15 Q. Did you, after becoming aware of the Treijs
16 incident, learn in follow-up that Palm Beach County
17 Sheriff's Office did nothing with the report when it
18 was made to them about somebody in their county?

19 A. I was told that.

20 Q. And while there's never an excuse for not
21 doing things correctly, did the Treijs report as
22 given, would that information have led to an
23 arrestable offense?

24 A. No.

25 Q. And by the way, if the subject was in Palm

1 Beach County, who ordinarily, as you understand state
2 law enforcement responsibilities and statutory
3 authorities, had the law enforcement responsibility in
4 Palm Beach County?

5 A. Well, if it was a city, it would have been
6 the whatever city --

7 Q. West Palm Beach or --

8 A. Right. Or if it was the county, the Palm
9 Beach County Sheriff's Office.

10 Q. You mentioned the Pompano Beach training even
11 had helicopters repelling?

12 A. We did.

13 Q. At the Marjory Stoneman Douglas shooting, did
14 you learn that Deputy Madrigal from Fort
15 Lauderdale-Hollywood Airport was actually piloting an
16 aircraft over Marjory Stoneman Douglas in an effort to
17 assist and aid in the process?

18 A. I did learn that.

19 Q. And that another aircraft, a second Broward
20 County Sheriff's Office aircraft, had been dispatched
21 to survey the area?

22 A. Yes. So much of the training that we had
23 instituted and implemented was evident at not only the
24 airport, but also the massacre at Marjory Stoneman
25 Douglas. The training that the deputies had received

1 was evident.

2 Q. Now, it took a significant amount of time to
3 unravel all that happened and didn't happen at Marjory
4 Stoneman Douglas; fair to say?

5 A. Yes.

6 Q. But you were at Marjory Stoneman Douglas?

7 A. Yes.

8 Q. And was there a command staff, a command
9 post?

10 A. Of course there was. As soon as I got there,
11 they had a TOC set up, a --

12 Q. A TOC?

13 A. -- tactical operations center, and that's
14 where the SWAT command was. There was colonels --
15 they had Colonel (inaudible), Colonel Dale was there,
16 investigations were there, and then a command center
17 was later set up. And there's been talk -- I don't
18 really even believe that the special council for the
19 governor even understands what a command center is or
20 what it's supposed to do to write the things that were
21 written in that, it was just so egregious, but I
22 wouldn't have allowed them to go over to the command
23 center at that time even if it was set up. There were
24 thousands of people, parents, people looking for their
25 children. It was -- it was complete turmoil. There

1 was chaos. The news media, there were hundreds and
2 hundreds of news media trucks over there. Elected
3 officers were flocking in the area. It was easier --
4 it was a better work place for them to work at this
5 tactical operation center, to run the -- it was also a
6 homicide scene, so we had to have our crime scene
7 leaders in one place directing what they want,
8 conferring with the FBI, conferring with the Florida
9 Department of Law Enforcement. The tactical
10 operations center was working seamlessly, and that was
11 the place -- I mean, I think they just pulled the term
12 "command center" out, heard that there were command
13 centers, and there was a little time getting a command
14 center set up. It doesn't matter how long it took
15 getting the command center. Was information getting
16 out as fast as it possibly could? There were radio
17 issues, horrific radio issues. Coral Springs and us
18 were on different radio channels, we had different
19 radios. Coral Springs decided not to go to a regional
20 system. So many other variables. But as long as
21 communication was as good as it could be at the top, I
22 wasn't going to let it go anywhere else anyway.

23 Q. As far as you were able to understand, was
24 the operation at Marjory Stoneman Douglas involving
25 coordination with other reporting agencies?

1 A. Could you repeat your question, sir?

2 Q. Did BSO cooperate and coordinate with other
3 responding agencies --

4 A. Yeah.

5 Q. -- not BSO?

6 A. Yes, certainly.

7 Q. And was that consistent with the law
8 enforcement function as you understood it?

9 A. Yes.

10 Q. Was there any breach of protocol, failure to
11 comply with accepted standards, in trying to work
12 through that operations center and deal with the
13 tragedy?

14 A. No. I -- there were so many firefighters and
15 police officers from not only the Broward Sheriff's
16 Office, but from like cities like Fort Lauderdale,
17 Coral Springs, and -- I don't remember seeing a first
18 responder from any city that wasn't working as hard as
19 he or she could to bring calmness to the community, to
20 do the things that they needed to do, to follow up, to
21 transport to the hospital. I mean, it was -- I
22 don't -- you know, I don't know how you describe it if
23 one wasn't there, but it was an incredibly terrible
24 situation. It was a massacre, and everybody was
25 trying their best. Everybody was in virgin territory.

1 There's no handbook on, you know, how you're going to
2 react. You just rely on your training, you do the
3 things you were taught. And everybody was working so
4 hard, yet we had a few people who should have done
5 things differently and better. But it's a race issue,
6 and when you pick first responders from the human
7 race, humans are imperfect people and --

8 Q. Let me just ask --

9 A. -- my heart goes out to the families, it
10 really does.

11 Q. Sheriff, let me ask for clarification. I'm
12 not certain that our phrase "a race issue" came across
13 as you intended. You're not talking about differences
14 in people --

15 A. No, I'm talking about --

16 Q. -- you're talking about human nature?

17 A. -- the human race, yes.

18 Q. Making -- decision-making and how people do
19 that?

20 A. Yes, that's exactly what I'm talking about.

21 Q. Now, as part of your job as sheriff, you have
22 a community responsibility. You talked about that
23 when we opened, right?

24 A. Yes.

25 Q. And was there a need for you as sheriff to

1 communicate post Marjory Stoneman Douglas to the
2 greater community?

3 A. Yes.

4 Q. Was there concern, as you understood it,
5 about safety and safety of the children and the
6 schools?

7 A. Yes.

8 Q. As well as other potential for terrorist
9 attacks?

10 A. Yes.

11 Q. And as part of a sheriff, as part of being
12 conservator of the peace, is it your job to let the
13 public know what's going on?

14 A. Inform and educate.

15 Q. And did you do that soon after the Marjory
16 Stoneman Douglas tragedy in a town hall meeting?

17 A. I did.

18 Q. And were you situated opposite a spokesperson
19 for the National Rifle Association?

20 A. I was.

21 Q. Dana Loesch?

22 A. That's not how it was planned. I got a call
23 from the United States congressman, Congressman
24 Deutch, and he asked me to be a part of the town hall
25 meeting. He thought it would be important that I had

1 information to impart with the public. And when I got
2 there, not only was the congressman there, but Senator
3 Nelson, Senator Rubio, and it was kind of like a
4 sheriff doesn't belong on stage with those
5 individuals. So I was -- I was told that I wouldn't
6 be part of that segment. Of course, I said "Roger
7 that," and then I was asked if I would go on in my own
8 segment with a woman from the NRA. I said "Sure." We
9 went on. I think we were on maybe five or ten
10 minutes.

11 Q. And during that segment, did it end up that
12 there were caustic comments by the NRA because of some
13 positions you had asserted?

14 A. I think there were. I mean, my position is I
15 support the second amendment and an American's right
16 to bear arms, but I just don't want to see guns in the
17 hands of people who are convicted felons, people who
18 are on no-fly lists, and people who are suffering from
19 mental illness. I pray for them and I hope they get
20 better, but I don't think they should have guns while
21 they're fighting mental illness. And whatever my
22 opinions were, she disagreed, she made that known, and
23 there was -- to my knowledge, there was no exchange
24 between us as far as, you know, any -- there was no
25 argument.

1 Q. And following that interview, did you learn
2 of political attacks on you and your position
3 regarding the second amendment?

4 A. Yes.

5 Q. And at that point, did you become a campaign
6 issue by one of the candidates?

7 A. I don't know at that point. I know one of
8 the state -- one of the state reps from Florida, I
9 don't remember his name, but he called for me to
10 resign a day later or two days later. But then
11 eventually both candidates running for governor,
12 both -- or two of the Republican candidates said that
13 they would suspend the sheriff.

14 Q. One of them being now --

15 A. One of them being --

16 Q. -- Governor DeSantis?

17 A. -- Governor DeSantis.

18 Q. And in the course of that campaign for
19 governor, you were not up for election?

20 A. No.

21 Q. You were doing your sheriff responsibilities
22 during that election time?

23 A. Yes.

24 Q. And in the course of that political campaign
25 season, did you become aware of the NRA actively

1 promoting your ouster from office?

2 A. Yes.

3 Q. Did you respond to the NRA?

4 A. No.

5 Q. Are you anti-gun?

6 A. No.

7 Q. You mentioned you respect the second
8 amendment?

9 A. I do.

10 Q. Your views, however, differed from at least
11 what the NRA spokesperson had -- had offered --

12 A. Yes.

13 Q. -- when it came to certain conditions for gun
14 ownership?

15 A. That's where the difference occurred.

16 Q. Now, Broward Sheriff's Office has instituted
17 a NIMS system, N-I-M-S?

18 A. Yes, we have.

19 Q. And is that part of the sheriff's oversight
20 to develop a means of communication from top to
21 bottom --

22 A. It is.

23 Q. -- at the sheriff's office?

24 A. Yes.

25 Q. And are there certification standards that --

1 that BSO has obtained in developing that
2 communications model?

3 A. Yes.

4 Q. And does the sheriff's office require that
5 all of its staff members, all of its 5,000 plus staff
6 members, go through appropriate NIMS training?

7 A. Yes.

8 Q. And is that an approach that helps you
9 develop policy and practices, as well as training, for
10 the sheriff's office?

11 A. Yes.

12 Q. All components of it?

13 A. All components.

14 Q. And if I brought out to you Exhibits 22
15 and -- 21, 22, and 23, Israel Exhibits 21, that's
16 Israel page 1863, Israel Exhibit 22 marked as Israel
17 1771, and Israel Exhibit 23, Bates No. Israel 1776 --
18 I'm not -- if you need to see them, I'll show them to
19 you, but those are documentation of the NIMS
20 certification and training for all the people at BSO,
21 right?

22 A. Right.

23 Q. As well as an explanation of the NIMS model
24 or NIMS process?

25 A. Yes, sir.

1 Q. Sheriff, I want to close with -- with you
2 with one area.

3 A. Yes, sir.

4 Q. And I'm going to hand you the Governor's
5 Exhibit S, the Governor's Exhibit S, as in Sam. It's
6 a transcript of an interview with Jake Tapper.

7 A. Yes.

8 Q. February 25, 2018. So soon after the Marjory
9 Stoneman Douglas interview.

10 A. Thank you.

11 Q. You've read that?

12 A. I have.

13 Q. You're familiar with it?

14 A. Yes.

15 Q. You did go -- you did go on CNN for an
16 interview. And was that part of your role and
17 responsibilities of community informing?

18 A. Self-imposed, yes.

19 Q. Was the community still reeling from,
20 reacting from the realization of the scope of the
21 Marjory Stoneman Douglas tragedy?

22 A. So much.

23 Q. And did you feel that -- from the community
24 that there was some potential for false attacks on
25 dep- -- not physical attacks, but relational attacks

1 on BSO and the law enforcement officers who served the
2 community?

3 A. Yes.

4 Q. Some sense of distrust?

5 A. Morale at the agency was low. There was so
6 much false information out there. And there might
7 have been accurate information out there, but it was
8 only 11 days after the massacre. Nobody really had a
9 handle on -- investigation was still in the embryonic
10 stages. There was so -- I can go on and on and on and
11 tell you about made-up, fictional reports that were
12 out there. There was one with what I remember that
13 was bizarre that said -- it was on one of the national
14 news networks that said that when I arrived on the
15 scene, the first radio transmission I gave was for
16 deputies not to enter into Marjory Stoneman Douglas to
17 look for the killer without body cameras. Only the
18 deputies with body cameras --

19 Q. That you made that announcement?

20 A. Yeah. If it wasn't so dreadfully serious, it
21 would have been classified as silly. When I arrived,
22 the killer was already in custody at another location.
23 I'm a former SWAT commander, I'm a tactical person,
24 and I know what our training would be. I never got on
25 the radio, I never said anything on the radio. So to

1 even say that -- but these are the things that were
2 out there. And if you don't -- sometimes if you don't
3 feed the story, people say what they want. And I knew
4 I had to go on to -- my sole -- my two-fold purpose,
5 one was to inform the community of anything that the
6 moderator might ask, but the other was to let folks
7 know that BSO, if, God forbid, something like this
8 happens tomorrow, the next day, next week, you can
9 have confidence in this agency. We're prepared to
10 handle what we need to, as prepared as any agency
11 could be.

12 Q. If you had to do that interview over again,
13 would there be any differences?

14 A. Yes. There would be one. I don't know if
15 this is what -- where I would be going, but at one
16 point in the interview, I used the term "amazing
17 leadership" about myself. I've apologized, and anyone
18 who's listening today, I apologize for the use of that
19 term. My sole focus -- the only group that I wanted
20 to say were amazing were the men and women I work
21 with. I just wanted to say don't judge one great
22 agency on one incident, judge them by the body of
23 their work. I apologize for the use of that word.
24 I'm not an "I" guy, I'm a "we" -- a "we" leader.. I
25 talk about the group, not myself. And leaders don't

1 go on and tout themselves. They let other people talk
2 about them. I just wanted to let the community know
3 that our agency was ready to handle what was coming
4 our way, and I apologize for saying that.

5 Q. When you were elected and then reelected, do
6 you believe that you were elected to serve as sheriff
7 for that entire four-year term?

8 A. Absolutely.

9 Q. Is that your promise to the people of Broward
10 County?

11 A. My absolute promise to serve and fulfill my
12 term and then some.

13 Q. And in the course of fulfilling that term,
14 have you done all that you reasonably could to be an
15 effective, capable sheriff of Broward County?

16 A. I'll answer that this way because a lot of
17 people are meeting me for the first time and don't
18 know me, but if my wife were here today, she'd tell
19 you I've been a good husband, and if my kids were here
20 today, they'd tell you I've been a good dad, and if my
21 community were here today, they'd tell you I've been a
22 good sheriff.

23 Q. And do you intend to fulfill that promise to
24 serve the people of Broward if the senate deems you to
25 be able to do that?

1 A. If that's the senate's will, I will fulfill
2 my term, yes.

3 MR. KUEHNE: I tender the witness.

4 SPECIAL MASTER: Thank you. We're going to
5 take a 10-minute break and we're going to come
6 back with cross examination by Mr. Primrose and
7 Mr. MacIver. And we'll reconvene at 10 minutes
8 till 11:00. Thank you.

9 (Brief recess.)

10 SPECIAL MASTER: Mr. Primrose, it's your
11 witness under cross examination. Please proceed.

12 MR. PRIMROSE: Thank you, Special Master.

13 CROSS EXAMINATION

14 BY MR. PRIMROSE:

15 Q. Mr. Israel, when you were elected to hold
16 sheriff within Broward County, you understood that it
17 was solely under your authority that the sheriff
18 office would exist, right?

19 A. Yes.

20 Q. And that's because any function that occurs
21 within Broward Sheriff's Office is done entirely under
22 what -- either your constitutional -- the creation of
23 your constitutional office, right?

24 A. Right.

25 Q. Or the Florida Statutes that we discussed --

1 or you and your attorney discussed?

2 A. Right.

3 Q. Meaning every employee within Broward
4 Sheriff's Office is acting under your authority as the
5 sheriff?

6 A. Yes.

7 Q. Okay. And in the chain of command within
8 Broward Sheriff's Office, you were the ultimate
9 decision-maker then?

10 A. Yes.

11 Q. Meaning if you wanted to go to the left,
12 everybody had to go to the left?

13 A. I don't understand what you're saying.

14 Q. Meaning if you wanted a policy to go one
15 direction, that's the direction the policy was going
16 to go?

17 A. Correct.

18 Q. Didn't matter if anybody else in the agency
19 said "We don't want to go that way," it was your
20 decision?

21 A. After listening to every member of the agency
22 that I want -- that I thought should weigh in or would
23 weigh in when a policy was going to be changed or not
24 changed or re-created or created, I would have final
25 say.

1 Q. Okay. And because of that, that also means
2 if you didn't want to hire a deputy or any other
3 personnel, you could have ultimately made that
4 decision?

5 A. Yes.

6 Q. And you could have ultimately made a decision
7 whether an employee was promoted?

8 A. Yes.

9 Q. Demoted?

10 A. Yes.

11 Q. You could have had the ultimate decision on
12 deputy assignments?

13 A. Yes.

14 Q. And you also -- as you mentioned, you had the
15 ultimate to say on all agency policy decisions?

16 A. Correct.

17 Q. And that includes any training decisions?

18 A. Correct.

19 Q. And we heard some testimony yesterday that I
20 think needs some clarification, and it was questions
21 asked by your counsel regarding FDLE and the Criminal
22 Justice Standards and Training Commission. Do you
23 remember some of those questions?

24 A. Questions that were posed to me, sir, or
25 posed to other witnesses?

1 Q. Posed to other witnesses that were testifying
2 on your behalf.

3 A. Well, they weren't testifying on my behalf.
4 They were just testifying to the truth and facts.

5 Q. But they were on your witness list?

6 A. They were on my witness list, but not
7 testifying on my behalf. So if you're going to ask a
8 question, I would -- it's up to the Special Master,
9 but I would think if you're going to ask a question
10 about another witness, you would ask it to the other
11 witness. I can't answer for them, sir.

12 Q. Okay. But you were sitting here when they
13 were asked some questions?

14 A. Yes, sir.

15 Q. And you -- you would agree with their
16 answers, that FDLE nor the CJSTC have a requirement
17 for active shooter training?

18 A. To my knowledge, they don't.

19 Q. Okay. And you'd agree that a Florida law
20 enforcement officer is required by CJSTC to have 40
21 hours of training every four years, right?

22 A. To my knowledge, yes.

23 Q. Okay. And are you aware of what the topic
24 areas are within that 40 hours of training?

25 A. I believe -- you mean diffusion -- or

1 de-escalation might be one topic. You'd have to
2 refresh my memory.

3 Q. So if I told you that the topic areas that
4 were covered were traffic stops and discriminatory
5 profiling, domestic violence, juvenile sex offender
6 investigations, human diversity training --

7 A. Human diversity training.

8 Q. -- and use-of-force scenario-based training,
9 that's within -- that sounds about right to you?

10 A. Does sound about right, yes.

11 Q. Okay. And you realize that those five areas
12 are ones that are either authorized or required by
13 Florida State Statute?

14 A. Yes.

15 Q. And those are just minimum requirements to be
16 a law enforcement officer anywhere within the State of
17 Florida, right?

18 A. Correct.

19 Q. But CJSTC nor the Florida Department of Law
20 Enforcement dictate specific training to any other
21 agency within the State of Florida, right?

22 A. Are you telling me that or asking me that?
23 I'm not sure.

24 Q. I'm asking you if you agree with that, that
25 CJSTC does not dictate training policies for

1 individual law enforcement agencies in the State of
2 Florida?

3 A. I would agree.

4 Q. Okay. And so that means that -- there was
5 some questions asked -- an officer in a small rural
6 town that might only have one stoplight, one school,
7 is not going to have the same training required of one
8 that might be in Miami-Dade?

9 A. I certainly can't answer that question. I
10 can only answer the training that we need to supply in
11 Broward County. It would be unfair to ask me to
12 compare what other officers or deputies would need in
13 other places that I've never been to.

14 Q. Yeah. But I think you'd have to at least
15 agree that it wouldn't be necessarily logical for the
16 training that say is required by the Miami-Dade Police
17 Department is the same training that would be required
18 for the smallest rural town in Florida?

19 A. I couldn't possibly answer that question.

20 Q. Okay.

21 A. Ask me about training that is apropos for
22 Broward County.

23 Q. That's absolutely fair that that's your
24 opinion. So -- but you would agree that each agency
25 leader, meaning each sheriff or each police chief, has

1 a responsibility to determine which additional
2 training is -- is best for their agency?

3 A. I would agree with that.

4 Q. And which training should go above and beyond
5 the basic training that's required by -- by CJSTC and
6 Florida Department of Law Enforcement to be a law
7 enforcement officer?

8 A. I would agree.

9 Q. Okay. And in the county, you've already said
10 that that's the sheriff's responsibility then, what
11 additional training above and beyond the minimums?

12 A. Yes.

13 Q. Okay. Now, a new graduate from the law
14 enforcement academy or the police academy doesn't
15 necessarily have all the training that would be
16 required to be a BSO deputy, right?

17 A. Well, when they graduate, they have all the
18 training that they're required to be a deputy, of
19 course, or they wouldn't be graduating from the
20 academy. The academy is giving them their certificate
21 and they're saying they're a full-fledged deputy, able
22 to work wherever the leader would want them to work.

23 Q. But we heard yesterday from Detective Curcio
24 that different agencies have different field training
25 that officers are required to go to even after they've

1 completed their minimum training at the police
2 academy?

3 A. Well, the field training is -- that's
4 probably the second most important thing an agency can
5 do. The most important thing you can do, sir, is to
6 hire the right people, and the second most important
7 thing is to train the people the right way. So you're
8 not going to take a person who graduated the police
9 academy and put them out in the streets of your county
10 without having a field training officer under -- you
11 know, train them, monitor them, evaluate them, and
12 make sure that he's doing reports or she's doing
13 reports, evaluating that, you know, newly-hired
14 officer to make sure they can do the job and, you
15 know, you're getting feedback on them.

16 Q. But it's not just newly-graduated police
17 officers from the academy, because as we heard
18 Detective Curcio say, he had 30 years of law
19 enforcement experience and he was still required to go
20 through Broward Sheriff's Office field training,
21 right?

22 A. New officers to the agency, probably 90
23 percent of them are going to come out of the academy,
24 and I assume some are going to come from other
25 agencies or other places, but anyone who's new to your

1 agency.

2 Q. And your field training -- your field officer
3 training is a specific requirement to your agency?

4 A. Yes.

5 Q. There's no FDLE requirement that there's a
6 field training program for each agency?

7 A. Correct.

8 Q. And you didn't need a direction from CJSTC to
9 create a field training program?

10 A. No.

11 Q. And, in fact, you don't need the legislature
12 to pass a statute or law that you have a field
13 training program specific to your agency?

14 A. No.

15 Q. And I think you had testified your job is to
16 make sure that you hire the best and that you provide
17 them the best tools to complete their jobs, right?

18 A. That's correct.

19 Q. Okay. In Broward sheriff's, your officers at
20 the time used mobile data terminals, correct?

21 A. Correct.

22 Q. And they needed to be trained on those
23 terminals?

24 A. Yes.

25 Q. And that's not training that's mandated by

1 FDLE?

2 A. That's correct.

3 Q. It's not training that's mandated by CJSTC?

4 A. That is correct too.

5 Q. Nor the legislature?

6 A. Nor the legislature.

7 Q. And you testified this morning about the fact
8 that your deputies who respond to Marjory Stoneman
9 Douglas were carrying tourniquets?

10 A. A lot of them were carrying kits.

11 Q. Kits?

12 A. Yes.

13 Q. And you highlighted that thankfully they have
14 those kits because they were able to save additional
15 lives that were brought to the hospital, right?

16 A. And not only deputies from the Broward
17 Sheriff's Office, but these police officers from other
18 agencies as well.

19 Q. Okay. Tourniquets aren't covered in first
20 aid training under CJSTC guidelines, correct?

21 A. I don't think so.

22 Q. So the deputies that you hired to BSO, they
23 would have required additional training on how to use
24 field tourniquets and other first aid measures?

25 A. Correct.

1 Q. And, again, FDLE doesn't require you to do
2 that training?

3 A. Correct.

4 Q. They didn't set the minimum standards?

5 A. No.

6 Q. CJSTC didn't do that?

7 A. No.

8 Q. The legislature didn't pass a law saying that
9 each agency needs to teach how to use a tourniquet?

10 A. No.

11 Q. And so you would agree with me, then, that
12 it's the sheriff that requires additional training
13 when he believes -- he or she believes it's necessary
14 for the agency to adequately protect the community?

15 A. I would agree with that statement.

16 Q. Okay. And it's not FDLE's responsibility
17 that a sheriff office have additional training?

18 A. Certainly not.

19 Q. Not CJSTC's?

20 A. No.

21 Q. Not the governor's?

22 A. No.

23 Q. Not the legislature's?

24 A. No.

25 Q. And as we heard in questions from your

1 counsel, it's not even Congress' responsibility to
2 ensure that a sheriff implements the additional
3 training that he or she feels is necessary for
4 their -- their deputies?

5 A. Correct.

6 Q. Okay. Now, if you wanted to, you could
7 implement certain additional trainings?

8 A. Yes.

9 Q. You could make trainings more frequent?

10 A. Not necessarily, no. I would disagree with
11 that, and here's why: There's a -- a national issue
12 of law enforcement. There are many vacant positions.
13 So if you can't fill vacancies on an agency, there's a
14 lot of training that you can't do or do as often as
15 you want because you can't leave the road or the
16 community short of police officers. So sometimes you
17 might want to do three, four trainings on something a
18 year, but especially in the agency like the Broward
19 Sheriff's Office, for example, if somebody would have
20 recommend maybe we can train our school resource
21 deputies more often, you can't take them out of
22 schools. They need to be there to protect children.
23 So just because you see sometimes the need for more
24 training, you don't have the manpower because of
25 vacancy issues and you're not able to do that. So

1 there's a lot of things that go into -- especially
2 with agency our size, there's a lot of variables that
3 go into it.

4 Q. How many days a week is school in session
5 when the school is normally in session?

6 A. Five.

7 Q. Five. So that leaves two days a week that
8 they're not in session?

9 A. Correct.

10 Q. And do you know how many days a year school
11 is actively in session?

12 A. Thirty something.

13 Q. Okay.

14 A. Forty.

15 Q. And they've got summer break, they've got
16 spring break, and they Christmas break. So there's at
17 least three opportunities throughout a calendar year
18 where the deputy assigned to the school doesn't have
19 to -- isn't doing his normal SRO duties, correct?

20 A. Right, but the -- and that's when we do the
21 predominant amount of our training because of exactly
22 what you said, when the deputies are off during the
23 summer -- or when the schools are off during the
24 summer, the summer months are when we -- are when we
25 concentrate on the field training, all the mandatory

1 training that has to go into being a field training
2 officer -- I mean a school resource officer.

3 Q. Right. And it was your decision to only make
4 school resource officers go to an annual training in
5 the summertime?

6 A. Correct.

7 Q. But not in -- not during spring break?

8 A. Correct.

9 Q. Not during their Christmas break?

10 A. Correct.

11 Q. And, again, that's something that you could
12 have implemented, you could have required not even
13 just school resource officers, but any of the deputies
14 in your agency to attend certain trainings more
15 frequently?

16 A. Right, but I must say this: We were well
17 within the industry standard of training of agencies
18 our size to mandate that deputies go through active
19 killer training once every three years, with an agency
20 of 1,800 deputies or thereabouts is well within
21 industry standard, and our deputies were receiving the
22 appropriate training and they were receiving the right
23 amount of training.

24 Q. But, again, I want to go back to this, it was
25 your decision, you could have prioritized certain

1 trainings more often, right?

2 A. Right.

3 Q. You could have prioritized certain trainings
4 longer, make them more extensive trainings, right?

5 A. Yes.

6 Q. Okay. And you could have made the school
7 resource officers do the active shooter training on a
8 more frequent basis than just -- than just once every
9 three years?

10 A. Yes.

11 Q. And you already testified that you were
12 familiar with Florida Statute 30.15?

13 A. Yes.

14 Q. And that's the duties and responsibilities
15 of an elected sheriff in the State of Florida, right?

16 A. Yes.

17 Q. And there was a long discussion about what
18 really was the responsibility of a sheriff, and my
19 words in my opening statement were taken, and you said
20 you disagreed with me as to what I said what
21 "conservator of the peace" meant, right?

22 A. Yes.

23 Q. And are you aware that the -- the words that
24 I was using were actually from a Florida District
25 Court of Appeal case?

1 A. No.

2 Q. Your attorney didn't show you in the
3 memorandum that we wrote that he went through that
4 that actually is from a Florida Fifth District Court
5 of Appeal decision called State v. ARR?

6 A. I think it was the interpretation rather than
7 the words, the way you were interpreting it.

8 Q. Okay. Let's do this exercise: The case
9 there -- and it's highlighted -- says, "Section 30.15
10 states in relevant part sheriffs in person or by
11 deputy shall be conservators of the peace."

12 Do you agree that that's the first sentence
13 of the highlighted portion?

14 A. Yes.

15 Q. And then it says, "And in a complex society,
16 police are charged with the duty to protect people and
17 property wherever they are situated under a variety of
18 circumstances," right?

19 A. Yes.

20 Q. That's the first thing I said is they are
21 charged with a duty to protect people and property.

22 The second -- or the last sentence there
23 highlighted says, quote, "In performing this duty,
24 they're required to protect against crime without
25 waiting for it to occur," right, that's what it says?

1 A. Yes.

2 Q. And that's exactly what I said, right?

3 Didn't I say in my opening that the conservator of the
4 peace also includes a duty to protect against crime
5 without waiting for it to occur?

6 MR. KUEHNE: Objection.

7 SPECIAL MASTER: Please proceed.

8 MR. PRIMROSE: Thank you.

9 BY MR. PRIMROSE:

10 Q. That comment that I said was taken exactly
11 from a Fifth District Court of Appeal case from the
12 State of Florida.

13 A. I -- if you said it like that, that's not how
14 I received what you were saying. I received as you
15 were saying that it's the responsibility of a sheriff
16 to eliminate crime and to prevent crime from
17 happening, and we both know that's an impossibility.

18 Q. Okay. Now, you'd also agree --

19 MR. KAPLAN: Special Master, I don't mean to
20 interrupt, but the exhibit --

21 SPECIAL MASTER: I'm sorry. Please proceed.

22 MR. PRIMROSE: Okay. Thank you.

23 BY MR. PRIMROSE:

24 Q. Now, we didn't go into this -- you didn't go
25 into this on direct examination, but I think it's an

1 important point to mention.

2 Do you agree that the deputies that you
3 assign or appoint are acting under your authority as
4 sheriff?

5 A. Yes.

6 Q. And are you familiar with Florida Statute
7 30.07?

8 A. I think so.

9 Q. And are you -- do you agree that it says that
10 because sheriffs appoint deputies, the deputy -- or
11 the sheriff is also responsible for the neglect or
12 default of the deputies that they appoint?

13 A. You'd have to show that to me, but I would --
14 I would think that that's accurate.

15 Q. Okay. Would you like me to show it to you?
16 I can.

17 A. No.

18 Q. Okay. So you'd at least agree that it
19 says -- and I'm jumbling up the way the words are
20 ordered, but essentially because the sheriff has to
21 appoint deputies to act with the sheriff's authority,
22 the sheriff is responsible if the deputies are
23 neglect -- commit neglect or default?

24 A. Yes.

25 Q. Okay. Now, I want to talk about -- there are

1 a lot of discussion about these organizations that
2 exist across the United States and globally. One of
3 them was CALEA. And you're familiar with CALEA?

4 A. CALEA?

5 Q. CALEA, excuse me. You're familiar with
6 CALEA?

7 A. Yes.

8 Q. And CALEA is actually a voluntary
9 organization?

10 A. It is.

11 Q. There's no mandate from the State of Florida
12 that a sheriff's office or police office be a part of
13 this organization?

14 A. That's correct.

15 Q. And isn't it also true that CALEA requires
16 the law enforcement agencies to pay to be a member of
17 CALEA?

18 A. That's correct.

19 Q. And you're paying to get access to some model
20 policies that CALEA wants the agencies to follow,
21 right?

22 A. I don't necessarily know that to be the
23 reason you pay, no.

24 Q. Were you aware that the way that CALEA
25 accredits an agency is by looking to see how many

1 CALEA policies are adopted by the agency?

2 A. Well, that's one dimension of CALEA, but they
3 do so much more than that. I've been there for their
4 reviews.

5 Q. Okay. And CALEA -- BSO being an accredited
6 agency under CALEA wasn't something new under your
7 tenure as the sheriff, right?

8 A. No.

9 Q. Right. BSO's actually been paying to be an
10 accredited member of CALEA since 1999?

11 A. I didn't know that.

12 Q. Okay. And there were a couple other -- you
13 remember seeing the exhibit from your attorney showing
14 all the different accreditations that BSO has?

15 A. Yes.

16 Q. Is it fair to say that none of the
17 accreditations on that sheet were new under your
18 tenure as the sheriff?

19 A. I'm not sure.

20 Q. Okay. We can pull it up if you'd like, but
21 I'd submit to you that none of the accreditations that
22 have been highlighted -- and this is Exhibit --

23 A. All you'd have to do is also pull up the
24 dates of their first accreditation and that would --

25 Q. Yeah. So let's -- well, this is Israel

1 Exhibit 11, and we'll just start with law enforcement.
2 CALEA, first accredited 1999, and then the Commission
3 for Florida Law Enforcement Accreditation, 2001. We
4 could go through the entire list of accreditations,
5 but --

6 A. I trust -- if you say the dates pre-dated me,
7 then I would agree with you.

8 Q. Okay. And we also heard about the
9 International Association of Chiefs of Police --

10 A. Yes.

11 Q. -- right?

12 And that's not an organization that a
13 particular sheriff's office or police department
14 becomes a member of, right?

15 A. Correct.

16 Q. That's for individual members to join?

17 A. That is.

18 Q. And, again, it's individual members paid to
19 join the international association?

20 A. Yes.

21 Q. Okay. Now, lot of discussion on the active
22 shooter policy, and on direct examination, you talked
23 about it being a concerted effort to develop this
24 policy, right?

25 A. Yes.

1 Q. You had your command staff included?

2 A. Yes.

3 Q. You had the road patrol, you got their input,
4 right?

5 A. Well, actually, it was -- it went the other
6 way. The command staff got the road patrol or whoever
7 they got involved, and then command staff came to see
8 me to discuss they felt it rose to -- you know, it was
9 an important policy and it rose to my level, and they
10 were absolutely right. So then I engaged in
11 conversations with command staff.

12 Q. Okay. Am I correct in my understanding that
13 the introduction of 4.37, the active shooter policy,
14 was under your tenure as sheriff, meaning the creation
15 of the policy in the Broward Sheriff's Office standard
16 operating procedure occurred under your tenure?

17 A. The first policy ever on active shooter? I'm
18 not sure.

19 Q. Okay. I want to show you -- this is Israel
20 Exhibit 4. And Israel Exhibit 4, the first page of
21 that says "Date, October 4, 2013."

22 THE WITNESS: Special Master, may I get up to
23 read it? I can't really see it too well from this
24 manner.

25 SPECIAL MASTER: Can you see that screen?

1 MR. PRIMROSE: That might be worse.

2 SPECIAL MASTER: Is that harder? The answer
3 is yes, you may certainly come closer here if
4 you'd like to do so.

5 THE WITNESS: Okay. Yeah, I don't -- I don't
6 know if that was the development of the policy or
7 if that was, you know, an amendment to the policy.

8 BY MR. PRIMROSE:

9 Q. Okay. So regardless of if it's the new
10 creation or an amendment to the policy, the policy
11 that existed -- and this says October 4, 2013, moving
12 forward says -- and I've highlighted it here -- "If
13 real-time intelligence exists, the sole deputy or team
14 of deputies will enter the area and/or structure to
15 preserve life," correct, that's what it says?

16 A. Yes.

17 Q. Okay. And when you were questioned by your
18 attorney, we heard that at some point, it was changed
19 to "may"?

20 A. Yes, sir.

21 Q. And that was your decision to change it to
22 "may"?

23 A. Yes.

24 Q. And isn't it true that after the Marjory
25 Stoneman Douglas shooting, the policy was then changed

1 to "shall"?

2 A. Yes.

3 Q. But you testified on direct examination that
4 "may" and "shall" are essentially the same word?

5 A. When "shall" has a caveat in there,
6 absolutely. I didn't say "may" and "shall" were the
7 same word, but I said in a policy that says "shall"
8 and has a comment in it that says "under reasonable
9 circumstances" or brings a caveat in to give the
10 officer discretion, it becomes the same as "may."

11 Q. So what's the purpose of changing it from
12 "will" to "may" under your tenure, and then from "may"
13 to "shall" under your tenure?

14 A. When we changed it back to "shall"?

15 Q. Well, this says "will."

16 A. This says "will" --

17 Q. And this was in October of '13.

18 A. And we changed it in 2016 because I felt and
19 still feel that the policy we changed it to is better
20 for deputies and is more in line with industry
21 standard and other policies throughout the nation.
22 Most of the policies that -- most of the policies from
23 large agencies will be more aligned with "may" and the
24 policy that I changed it to in 2016.

25 Q. Okay. And then you'd agree with me, though,

1 that after Marjory Stoneman Douglas, you changed the
2 policy to "shall"?

3 A. Yes.

4 Q. Why?

5 A. I was -- I had a conversation in my office
6 with Sheriff Bob Gualtieri, who was the chairman of
7 the Marjory Stoneman Douglas Commission, and it was
8 one of the things that he said the group was talking
9 about and he suggested that -- he was going to be
10 talking about other sheriffs and he suggested that we
11 change it back to "shall." He said that he thought,
12 you know, "shall" was the better way to do it. So we
13 developed a policy with "shall," and it basically says
14 the same thing. So we -- I just did that -- I felt
15 that, you know, I was being asked to do it, I
16 wanted -- in the spirit of full cooperation with the
17 commission, that's why I did it.

18 Q. Even though you don't think the policy change
19 from '16 to now, to 2018, has any practical
20 difference?

21 A. I know I'm not allowed to ask you questions,
22 but do you see a practical difference? Not that
23 you've ever been in police work or stuff, but I know
24 how deputies are going to respond, and the way it was
25 in 2016 was appropriate and within the lines of what

1 you'd want your deputies to do and how you want your
2 deputies to train. And you can't ask questions about
3 policy, I don't think, without asking about the
4 training that corresponds to it.

5 Q. But I guess the point that I'm getting at,
6 though, is you've testified that you don't think
7 practically there's any difference between the policy
8 that existed in 2016 to the policy that you
9 implemented before -- right before you were suspended
10 from office?

11 A. Correct.

12 Q. So, then, why change it? If it has no
13 practical effect, why change it, other than to maybe
14 try to avoid criticism that "may" provides discretion
15 to the deputies and "shall" is a directive that you
16 don't have discretion?

17 A. Respectfully, it sounds like you're answering
18 the question for me. I've already answered that
19 question. I did it because I was asked to by Sheriff
20 Gualtieri, and that's the answer.

21 Q. Okay. Now, an active shooter situations, I
22 think we all agree, are an unfortunate reality that we
23 now have in this -- in not only the country, but the
24 world, right?

25 A. Yes, sir.

1 Q. And with that, unfortunately, we know that
2 schools are becoming a likely target for these events?

3 A. Yes.

4 Q. And airports at least have similarly started
5 to be an increased target for active shooter
6 situations?

7 A. I don't know to be true.

8 Q. Okay. You'd agree that -- well, you
9 understand the word "soft target," what that phrase
10 means?

11 A. I do.

12 Q. And that's defined by homeland security as an
13 area that is easily accessible, contains large numbers
14 of people, and has limited security --

15 A. I would agree with that.

16 Q. -- right?

17 And so there's at least an understanding, not
18 even just in law enforcement, but globally that soft
19 targets are increasingly becoming used for active
20 shooter -- people that want to carry out mass casualty
21 events?

22 A. I don't necessarily agree with that. I mean,
23 if you're talking about -- certainly a soft target is
24 a (inaudible), and now you have horrific people
25 driving trucks into people when they can't find

1 weapons. So I think we're vulnerable. We're a free
2 society and I think we're vulnerable everywhere.

3 Q. Okay. You'd agree, though -- you at least
4 agree with me, though, that, I mean, schools are
5 considered soft targets that are being an increasing
6 venue for individuals to want to carry out mass
7 casualty events?

8 A. Well, define "increasing."

9 Q. I mean, let's go back. So Columbine in 1999
10 was really the first major one that's in a lot of
11 folks' minds, right?

12 A. Yes, sir.

13 Q. And since that time, there have been, it
14 unfortunately seems, more than just one every three or
15 four years?

16 A. Well, if you're going to ask the question,
17 I'd ask that you give me the exact number so I can
18 give you the answer. I don't know how many have been
19 committed since 1999.

20 Q. Let me ask you this: You as a sheriff for
21 -- you were elected once, you were reelected -- can't
22 tell me whether or not you agree that schools have
23 become an increasing -- school shootings have become
24 increasingly over the past 20 years?

25 A. What do you mean by -- I ask you again,

1 define "increasing." We have school shootings.
2 Protecting schools is -- but when you say
3 "increasing," every time a shooting happens anywhere,
4 it's increased by what? I don't know what you're
5 trying to say by "increasing."

6 Q. Okay. Let's do it this way, then, since
7 you're having difficulty understanding the question
8 here.

9 MR. KUEHNE: Move to strike.

10 SPECIAL MASTER: Denied. Go ahead.

11 BY MR. PRIMROSE:

12 Q. 1999, Columbine happened, right?

13 A. Yes, sir.

14 Q. Since 1999, school shootings are becoming
15 more frequent, yes or no?

16 A. Well, are you saying that -- I don't
17 understand what you're trying to say.

18 Q. Let's do it this way: So between -- we know
19 that Columbine happened in '99, the Sandy Hook
20 massacre happened in 2012?

21 A. Yes.

22 Q. Today, it is more apparent to law enforcement
23 that school shootings are a real possibility maybe
24 compared to 20 years ago or 30 years ago?

25 A. I would absolutely agree with that statement.

1 Q. Okay. And that's an area that absolutely
2 needs to be prioritized by every single law
3 enforcement agency in the United States?

4 A. Yes.

5 Q. Okay. And I noticed yesterday and into today
6 you really wanted to talk about the Pompano Beach High
7 School training exercise that occurred?

8 A. Yes.

9 Q. And that occurred in May of 2013, right?

10 A. Yes.

11 Q. So about five months after you first took
12 office?

13 A. Yes.

14 Q. Okay. You talked about helicopters were
15 involved?

16 A. Yes.

17 Q. You repelled a K-9 down the side of the
18 school?

19 A. Yes.

20 Q. You had multiple agencies within Broward
21 County that responded to this training exercise?

22 A. Yes.

23 Q. SWAT was included?

24 A. Yes.

25 Q. I read an article that was provided by your

1 counsel that the whole premise of it started with an
2 SRO was approached by four -- I believe it was males,
3 and one of them said "One of those guys has a gun,"
4 right?

5 A. Yes.

6 Q. And then the SRO engaged the shooter, right?

7 A. Correct.

8 Q. SWAT arrived --

9 A. Yes.

10 Q. -- right?

11 One of the shooters or maybe two of the
12 shooters created a hostage situation, right?

13 A. Yes.

14 Q. They barricaded themselves --

15 A. Yes.

16 Q. -- in a classroom?

17 Hostage negotiators were used to try to
18 defuse the situation?

19 A. Yes.

20 Q. Okay. And this all happened in one day?

21 A. Yes.

22 Q. It was a one-day training?

23 A. Yes.

24 Q. How many Broward Sheriff's Office school
25 resource officers participated in that training?

1 A. I'm not sure.

2 Q. Did the training happen multiple times that
3 day?

4 A. It was one continuous training exercise.

5 Q. Okay. But I guess my point is it wasn't like
6 we're going to start the training at 9:00 a.m., it's
7 going to be a one-hour event, and then we're going to
8 start it again at 11:00 and take it to 2:00?

9 A. No, no.

10 Q. So it was you start, you finish, end of the
11 day?

12 A. Yes.

13 Q. And it was one school resource officer who
14 engaged the initial shooter, and then SWAT arrives,
15 hostage negotiators arrive, and fire rescue?

16 A. Correct.

17 Q. So it wasn't like every single Broward
18 sheriff school resource officer got a chance to
19 participate in this Pompano Beach training in May of
20 2013?

21 A. I don't know how many were there, I really
22 don't.

23 Q. You have no idea how many of your school
24 resource officers --

25 A. I don't.

1 Q. -- went to a training that was designed to
2 test how a school resource officer and Broward
3 Sheriff's Office as a whole would respond to an active
4 shooter situation in a school?

5 A. Correct.

6 Q. And how many Broward SROs participated in
7 that training in 2014?

8 A. In which training in 2014?

9 Q. Well, the Pompano Beach High School active
10 shooter training that you did in May of 2013, how many
11 did it when the training happened in 2014, that
12 exercise?

13 A. I don't understand your question.

14 Q. Okay. Let's go back. May of 2013, you hold
15 this large-scale active shooter training at a high
16 school?

17 A. Correct.

18 Q. That training didn't happen in 2014, did it?

19 A. No.

20 Q. So no SROs under your agency attended a
21 similar full-scale exercise in 2014, right?

22 A. I mean, I would say we didn't do a full-scale
23 exercise in 2014, but I think it's also important to
24 know I don't know that any other county in the nation
25 did either. So I don't know where you're -- what your

1 trying to say, but, no, we did it -- we did it that
2 time and the training was incredible and there were
3 lessons learned from it, and these lessons were
4 taught -- you know, we constantly train. There's so
5 much training that goes -- we have training when we do
6 clearing training, you know, we talk about active
7 killer. So it's constant, so --

8 Q. And let me get to that --

9 A. It's not going to be done every year.

10 Q. Okay. And I want to follow up on that
11 because on direct examination, you highlighted how
12 renowned it was, not just in Florida, but nationally
13 folks are wondering how the heck did Broward Sheriff's
14 Office pull off this multi-agency, large-scale active
15 shooter training?

16 A. I don't know if you'd use the word
17 "renowned," but it was -- it was talked about, and our
18 colonels and command staff would come to me and they
19 would say they would get comments, "How did you guys
20 pull this off," because it was a lot that went into
21 developing the training.

22 Q. Okay. So -- but at a bare minimum, you have
23 to be thinking we're onto something here by doing such
24 a large exercise to really test every facet of not
25 only my agency, but surrounding agencies and fire

1 rescue, right?

2 A. You're telling me what I was thinking?

3 Q. I'm asking you. After you do the exercise
4 and you hear from your colonels that other law
5 enforcement agencies are asking "How did you pull this
6 off, it's great that you did this," you've got to be
7 thinking I got to do this more often, right? We've
8 got to hold a full-scale, real-life exercise in
9 schools more often because it worked so well in 2013,
10 I'm hearing that other people are asking about it, we
11 must be onto something, we need to do this more often?

12 A. I never said that. I mean --

13 Q. You never thought that?

14 A. There's -- the schools are one soft target,
15 but there are airports, there are a host of venues
16 that -- you know, there's a -- you know, got to do
17 training, you know, in different venues.

18 Q. Okay. So taking that, then, you're right,
19 there are other venues that are considered soft
20 targets that deserve full-scale, real-life exercises,
21 right?

22 A. Right.

23 Q. So you don't do the Pompano Beach training in
24 2014, maybe you do it at -- you do another soft
25 target. What about in 2015, did you do a similar

1 full-scale exercise at Pompano Beach High School to
2 test the SROs and how you might respond to an active
3 shooter situation in a school?

4 A. I think in 2015 or 2016 -- you know, I would
5 have to ask you to rely on Major Shults. I know he --
6 former Major Shults, he gave a deposition. So as far
7 as the calendar of training, I can't recall the
8 calendar of training. But I know there was a
9 full-scale exercise at the airport and seaport. I
10 don't remember what month or what year it was.

11 Q. Okay. And I'll get to that, I promise you on
12 that. Instead of me asking from every single year
13 after May 2013, you'd agree with me that in 2014, '15,
14 '16, '17, or '18, Broward Sheriff's Office under your
15 direction never held another full-scale, real-life
16 exercise to test an active shooter situation in a
17 school setting?

18 A. I think that's accurate.

19 Q. Okay. And do you know if SRO Peterson took
20 part in that May 2013 training at Pompano Beach High
21 School?

22 A. I don't know.

23 Q. Okay. Any deputy who attended that training,
24 it would have been on their training log, right?

25 A. Yes.

1 Q. So if -- and Deputy Peterson's training log,
2 which is an exhibit provided by your counsel, it
3 doesn't indicate a May of 2013 training, that would
4 imply he wasn't there and did not attend that
5 training?

6 A. Correct.

7 Q. Okay. Now, going back to the active shooter
8 policy, the policy is just the words written down,
9 right?

10 A. Correct.

11 Q. And it's my understanding in some of the
12 depositions that the piece of paper that the policy is
13 written on is e-mailed to each individual deputy?

14 A. Yes.

15 Q. And they have to -- they have to attest or
16 something that they read and understood the policy?

17 A. Sign for it.

18 Q. Okay. And then the other aspect of the
19 policy is now the training that goes hand in hand with
20 the written-down policy?

21 A. Yes.

22 Q. Okay. And in 2016, you then mandate active
23 shooter training to coincide with the written policy?

24 A. Correct.

25 Q. Okay. And we've heard some testimony that it

1 was two 4-hour blocks of training, right?

2 A. I don't know. You'd have to check with the
3 trainers. I don't know the calendar.

4 Q. If I told you that the folks that have
5 already testified said there was one 4-hour block that
6 was titled "Active Shooter" and then there was one
7 4-hour block that said "Rescue Task" or something
8 similar, does that sound about right to you?

9 A. Sounds about right.

10 Q. Okay. And you've already testified that the
11 two 4-hour blocks of training was once every three
12 years, meaning a deputy would do it in Year 1, but
13 they wouldn't do it in Year 2 or 3, they'd do it again
14 in Year 4?

15 A. Correct.

16 Q. Okay. And, again, you could have decided to
17 make that, instead of a three-year cycle, a two-year
18 cycle, right?

19 A. Or a five-year cycle or a six-year cycle.

20 Q. Okay. You think active shooter training
21 should have been done on a longer time cycle?

22 A. No, I think it should have been done exactly
23 how it was done. I thought --

24 Q. Three years was perfect?

25 A. Three years. It's not a perishable skill,

1 it's not, you know, studying for a chemistry test,
2 it's simply learning the movements and the philosophy
3 of what you need to do.

4 Q. Okay. I want to go through with you the
5 training on active shooter, and this is our Exhibit W.
6 And, Mr. Israel, I'll submit to you that this is the
7 lesson plan provided to us by BSO for the course
8 titled "Response to Active Shooter." Would you agree
9 that that's what the course title is?

10 A. Yes.

11 Q. Okay. I want to direct your attention to the
12 course agenda, and if you look at the course agenda,
13 you'll see it's broken down into five separate blocks,
14 right?

15 A. Yes.

16 MR. PRIMROSE: And Madam Court Reporter,
17 you're hearing him?

18 THE COURT REPORTER: Oh, yeah.

19 MR. PRIMROSE: I just want to make sure. And
20 you can stand up. I just wanted to make sure she
21 heard.

22 BY MR. PRIMROSE:

23 Q. So first block of time, 20 minutes spent on
24 introductions, right?

25 A. Right.

1 Q. Right?

2 A. Yes.

3 MR. PRIMROSE: Okay.

4 SPECIAL MASTER: He does need to answer the
5 questions into the microphone because this is not
6 just being transcribed, it's also on the record.

7 Thank you.

8 BY MR. PRIMROSE:

9 Q. If I put that up, is that large enough for
10 you to see on the TV?

11 A. Yes.

12 Q. Okay. So the first 20 minutes is spent on
13 introductions, right?

14 A. Yes.

15 Q. The next 50 minutes is a PowerPoint
16 presentation, right?

17 A. Yes.

18 Q. And then the third block, 40 minutes is spent
19 on two to four-man bounding overwatch practice, right?

20 A. Yes.

21 Q. Bounding overwatch is essentially like a
22 leap-frog exercise, right?

23 A. Correct?

24 Q. So person in the front does something,
25 somebody behind them comes and takes over, that's --

1 it's a multiple person leap-frog exercise?

2 A. Yes. It's basically developed and taught to
3 teach the units, teams, how to move towards the -- the
4 gunman and engage.

5 Q. Okay. And then there's 90 minutes spent on
6 practical exercises and scenarios, right?

7 A. Yes.

8 Q. And then a 10-minute just debrief and
9 cleanup?

10 A. Yes.

11 Q. Are you familiar in the 90 minutes -- let me
12 go back.

13 The two to four-man bounding overwatch, that
14 would not include solo deputy response to an active
15 shooter, right?

16 A. You would have to bring the instructors into
17 that. That would be something to ask the instructors.

18 Q. You as the sheriff have no idea whether or
19 not two to four-man bounding overwatch practice
20 includes single deputy response?

21 A. I know what two to four-man overwatch means,
22 what the practice means, but I'm not at the
23 instructions, so I don't know, I couldn't testify as
24 to what they're actually doing at the instruction.

25 Q. Okay. And so you couldn't actually tell us

1 in the practical exercises, how many scenarios are
2 done with just a solo deputy response?

3 A. I've been in -- I've witnessed some of the
4 practical exercises, but I couldn't tell you how many
5 are done solo.

6 Q. Okay. If I told you -- and we can go down to
7 it. All right. So we've got Exercise 1. This
8 Exercise 1 --

9 A. A little larger, sir?

10 Q. Sure, of course.

11 Exercise 1, first scenario, it says "two-man
12 deputy team," right?

13 A. Yes.

14 Q. Okay. Exercise 2, "single deputy" --

15 A. Yes.

16 Q. -- right?

17 Okay.

18 A. Could you go back to Exercise 2 so I could
19 read it a little bit?

20 Q. I'm just asking you what -- if it's solo or
21 multiple people.

22 A. I'd like you to go back to Exercise 2 so I
23 can read it. If you're going to ask me anymore
24 questions on this issue, I'd like to read it.

25 Q. Mr. Israel, I promise you that after I'm done

1 asking questions, Mr. Kuehne is going to get a chance
2 to go through every single question I ask and you'll
3 have a chance to follow up on any question that I
4 asked that you didn't feel you had a full chance to
5 respond. So --

6 MR. KUEHNE: Objection.

7 SPECIAL MASTER: Let me suggest that -- give
8 him an opportunity to read the whole section that
9 he is responding to. I think that's -- I think
10 that's a legitimate question on his part.

11 BY MR. PRIMROSE:

12 Q. Okay. So we'll go back, Exercise 2.

13 A. You can move up -- move it. You can keep
14 moving.

15 MR. PRIMROSE: Special Master Goodlette, at a
16 certain point, to ask to go through an entire
17 document when my question is very limited to
18 whether or not the exercise was a single deputy
19 versus two deputy, I mean --

20 SPECIAL MASTER: My concern is he's just
21 reading what you have highlighted, and I don't
22 know what else might be in there that you have not
23 highlighted that he's -- you're asking him the
24 question -- the question on. That's my only
25 concern.

1 MR. PRIMROSE: The question was only, though,
2 the -- how many individuals were asked to the
3 exercise. So, for example, the first -- Exercise
4 1, it says, "First scenario, two-man deputy team."
5 That's my sole question as to Exercise 1.

6 BY MR. PRIMROSE:

7 Q. And Exercise 2, it says, "Single deputy
8 response." We can all agree that it says that, right,
9 Mr. Israel?

10 A. Yes.

11 Q. Okay. And then Exercise 3 -- I'll give you a
12 chance to read that, but I'm seeing it says this
13 exercise is for a four-man deputy team?

14 A. Yes.

15 Q. Okay. And then -- and then it's done. So
16 one, two, three exercises, and then it says "debrief
17 and cleanup"?

18 A. Yes.

19 Q. Okay. Do you have any reason to disagree
20 with what was on there, that there were -- there are
21 three practical exercises that are gone through in the
22 four-hour training?

23 A. No reason to disagree.

24 Q. Okay. And I want to ask you about this.
25 We'll go back -- I told you we'd go back to this. So

1 Exercise 2, the single deputy response, which I think
2 is the very important part of all the testimony that
3 we've been hearing, the Exercise 2 on single deputy
4 response says --

5 A. Could you make it a little larger?

6 Q. Absolutely. There you go.

7 Deputy is going to search around a little bit
8 after hearing for gunshot, bad guy's going to be
9 distance away, blank gun firing intermittently, deputy
10 is going to move towards gunfire, passing dead
11 students and others running by him. This provides
12 real-time intell for the deputy, right?

13 A. Yes.

14 Q. Then it says, "Suspect will drop gun, raise
15 hands in surrender prior to the deputy making
16 contact"?

17 A. Yes.

18 Q. And then the single deputy is going to hold
19 the suspect at gunpoint, prone the suspect out. That
20 just means basically allow him to -- the deputy to pat
21 the suspect for guns, right?

22 A. Right.

23 Q. And then continues on, you're going to look
24 for potential weapons on the suspect.

25 Now, when it says "watch," that's a directive

1 for the instructor, right?

2 A. What's the question, sir?

3 Q. Under "watch," it says, "Instructors should
4 watch deputy." So the reason it says "watch" there,
5 am I correct that that is an indication for the
6 instructor, look out for the following things while
7 this single deputy is going through this exercise?

8 A. Yeah. I think a better word might have been
9 "evaluate," to evaluate the performance.

10 Q. Okay. And then it says "say." And would
11 "say" be a directive that the instructor should
12 provide some instruction or guidance to the deputy?

13 A. Yes.

14 Q. And I want to know about this last
15 highlighted line: "Remember the calvary is on their
16 way. So it's better to hold than to expose yourself
17 to unknown threats." What does that mean?

18 A. That means if you're sure that there's not
19 active killing going on; in other words, the active
20 killing is over or the suspect is barricaded, you
21 don't know where the suspect is, but your intell and
22 your senses tell you that nobody else is dying, it's
23 better to hold a position and wait for SWAT or
24 reinforcements. Has nothing to do with an active
25 killer situation.

1 In an active killer situation, you're moving,
2 you're moving, you're moving, as I said before, to
3 either neutralize the target, arrest the target, or
4 have the target surrender. But if there was, God
5 forbid, a shooting in this room and we chased the
6 shooter outside to another room, he's still a
7 murderer, he's still a felon, we still want to arrest
8 him, but there's no reason to go into a room to take
9 him into custody without waiting for reinforcements
10 because you're not worried about innocents getting
11 hurt.

12 Q. So the directive -- and that was under the
13 "say" section -- where an instructor might tell the
14 deputy "Remember calvary is on the way" does not apply
15 if the deputy still hears gunfire?

16 A. Correct.

17 Q. Okay. Now, my understanding is that under
18 your tenure, Broward Sheriff's Office had 12 trainers,
19 and I think that was in some of the testimony we heard
20 from some witnesses. Does that sound about right to
21 you?

22 A. I think -- well, we had -- we had other
23 people that do -- when you have an agency that large,
24 you have collateral trainers. You have people that
25 might do their regular jobs, but for a certain

1 specific training they will come off the road or away
2 from their assignment. So how many full-time trainers
3 we had compared to, you know, vis-à-vis how many we
4 had that do collateral training, I can't answer that.

5 Q. Okay. The number of trainers, that's a
6 personnel decision that would be up to the sheriff to
7 make?

8 A. Ultimately responsible for everything on the
9 agency.

10 Q. And the more trainers you have, presumably
11 the more trainings you can do?

12 A. No, not necessarily.

13 Q. No?

14 A. You still -- the number of trainers is --
15 that's just a fallacy, and, you know -- and I honestly
16 don't appreciate you answering the question for me.
17 It doesn't mean that at all. It's not about the
18 trainers, it's about the students. And when you have
19 an agency our size with all the vacancies we have, you
20 could have 100 trainers that could give people
21 one-on-one instruction, but if you don't have the
22 ability and you're going to make the county unsafe by
23 bringing students away from their regularly-scheduled
24 assignments to protect and serve and bring them into
25 training, that's not the best thing for the community

1 in my mind. So the amount of trainers or telling me
2 what the staff has is not indicative of the quality of
3 the training or our ability to train. It's about the
4 availability of the student and the necessity of that
5 specific training.

6 Q. Okay. I want to make sure that I -- that I
7 didn't mishear anything on direct examination. You
8 don't place any fault onto Broward County School
9 District for limiting how often you can train your
10 school resource officers, do you?

11 A. No.

12 Q. Okay. We'll talk about Fort Lauderdale
13 airport shooting for a moment. Five individuals
14 unfortunately lost their lives that day at the hands
15 of the shooter?

16 A. Yes, sir.

17 Q. And the shooter ran out of ammunition at a
18 certain point, right?

19 A. Yes.

20 Q. Dropped his gun, and when Deputy Madrigal
21 approached him, the active shooting had commenced,
22 wasn't going on anymore?

23 A. You'd have to ask Deputy Madrigal what
24 time -- at what time -- whether he saw the shot. I
25 know he took him into custody within 72 seconds, I was

1 told, after the first shot.

2 Q. Okay. Before we get into all the events that
3 happened that day, want to talk about the role of your
4 agency with the shooting. We've already heard, and
5 you don't disagree, right, that the Broward Sheriff's
6 Office was, in fact, the contracted law enforcement
7 agency for the airport?

8 A. I agree with that statement.

9 Q. Okay. And the essential operation of the
10 airport, grounds keeping, cleaning the floors, making
11 sure that the building is maintained, that's
12 presumably all kept with BCAD, the airport -- the
13 aviation district?

14 A. Correct.

15 Q. Okay. Broward -- the sheriff's office
16 agreement with BCAD was not unlike how the sheriff's
17 office might contract with a municipality to provide
18 law enforcement, right?

19 A. I think that's a fair statement.

20 Q. Okay. Let's talk about that. When Broward
21 Sheriff's Office is approached by a municipality,
22 "Hey, we want to outsource all of our law enforcement
23 to you," imagine you sit down with their principals
24 and go through some standard terms, right?

25 A. Yes.

1 Q. You look at the size of the municipality,
2 right?

3 A. Yes.

4 Q. You look at maybe how many large buildings or
5 areas that might be of concern from a law enforcement
6 perspective, right?

7 A. Yes.

8 Q. How many schools are in the municipality?

9 A. Yes.

10 Q. You probably even look at the crime rate in
11 that municipality when entering into a discussion to
12 provide law enforcement?

13 A. Yes.

14 Q. And so if a municipality came to you and they
15 had a high percentage -- a high crime rate and said,
16 "But we only want to pay for one Broward sheriff
17 deputy to be our law enforcement for our
18 municipality," you'd probably push back in that
19 discussion, right?

20 A. I can't answer a question with supposition.
21 You would have to give me a specific question. You
22 can't give me what would I have done in this
23 (inaudible), what would I have done -- that's not
24 fair. You ask me a specific question about a specific
25 contract, I can answer it, but unless ordered to by

1 the Special Magistrate, I'm not going to answer
2 questions about supposition.

3 Q. I'm just guessing -- or I'm just interested
4 in this question, though, is when you are approached
5 to provide law enforcement services to a
6 municipality --

7 A. Which municipality?

8 Q. I'm just -- in any situation, a municipality,
9 the airport district, for an outside event, you are
10 going into it with an understanding of what's going to
11 be requested of my law enforcement agency, what's the
12 threat of crime, how much crime is there, you want to
13 know all of those factors before you would ever enter
14 into an agreement to provide law enforcement services
15 for somebody outside of your agency?

16 A. I really don't even understand your question,
17 what you're trying -- I don't understand your question
18 at all.

19 Q. Let me try to break this down, and if you
20 don't want to answer hypotheticals, I'm not going to
21 ask the Special Master to require you to answer a
22 simple hypothetical, but here's what I want to --

23 MR. KUEHNE: Move to strike.

24 SPECIAL MASTER: Please proceed.

25 MR. PRIMROSE: Thank you.

1 BY MR. PRIMROSE:

2 Q. When you go to discuss with Broward County
3 Aviation District the contractual agreement to provide
4 law enforcement --

5 A. I've never had a discussion with aviation.
6 I've never been in on any of their conversations. So
7 I don't know what you're talking -- I can't answer the
8 question.

9 Q. You've never gone to a meeting with -- with a
10 representative of BCAD to discuss what law enforcement
11 services your agency would provide to the airport?

12 A. I don't believe I ever have. I think that's
13 all been brought back to me by staff. The
14 negotiations have been so seamless and so --
15 everybody's been on the same page, I don't believe
16 I've ever been part of a negotiation.

17 Q. But you would agree that your staff that you
18 have entrusted will come back to you with what they've
19 learned?

20 A. Yes.

21 Q. Or how their discussions went?

22 A. Yes.

23 Q. And you're ultimately the one that has to
24 sign the agreement --

25 A. Yes.

1 Q. -- with BCAD, right?

2 A. With the county.

3 Q. With the county to provide law enforcement
4 for BCAD?

5 A. Yes.

6 Q. So you're going to want to know all of the
7 statistics or the requirements that you're going to
8 put your agency in charge of protecting?

9 A. I'm going to want to know simply what
10 personnel BCAD is asking for, what they're willing to
11 pay for. You can't give them more resources or more
12 assets than they're going to pay for.

13 Q. Okay. Let's talk about that then. So you
14 said you do want to know how many deputies they're
15 asking for and how many they're willing to pay for?

16 A. Right. And of course, we make a
17 recommendation as to how many deputies they think they
18 should have, but, you know, if we recommend five, they
19 want 10, you know, there has to be a negotiation.

20 Q. If you want 150, they're only willing to pay
21 for 100, what happens at that point?

22 A. You'd have to give me a specific. I can't
23 give you a hypothetical answer.

24 Q. So we've already discussed that at the time
25 the airport shooting happened, there were

1 approximately 122 BSO deputies that were budgeted to
2 the airport?

3 A. Correct.

4 Q. And based on the reports, in 2007, there was
5 actually 150 BSO deputies that were budgeted for the
6 airport, right?

7 A. Right.

8 Q. So at some point between '07 and 2017, budget
9 dropped for law enforcement?

10 A. Well, I don't know if the budget dropped.
11 That's -- I mean, I'm not saying your information
12 isn't accurate, but there's more to it than that.
13 There might have been less deputies there, but there
14 might have been more civilians there to handle certain
15 of the traffic positions or posts that civilians are
16 able to handle. It's often said, PSA, police service
17 aide, community service aide, can actually do 65
18 percent of what a police officer could do for about --
19 or do 75 percent of what a police officer could do for
20 60 percent of the salary.

21 So 2007 pre-dated me. I didn't become the
22 sheriff until 2013. I don't know what contract -- I
23 don't know the date of the last contract with BCAD
24 and, you know, if I signed it or not, but I can tell
25 you that just because there were less police out there

1 or less deputies out there doesn't mean it was unsafe.
2 There could have been more civilians doing
3 non-life-threatening, you know, jobs.

4 Q. But I'll go back to this though. At a bare
5 minimum, if you believed that it was ill-advised to
6 have a minimum number of deputies there, you would
7 have made it known?

8 A. Let me answer it this way: The airport was
9 accurately staffed the day of the shooting. We had
10 the necessary assets and resources there. I don't
11 know what your contracts tell you, but the right
12 amount of people were there. The airport was as safe
13 as -- I wish I could go back in time and not have
14 that -- you know, the killer fly down on that plane.
15 But a killer entered a plane in Anchorage, Alaska,
16 flew to Minnesota, retrieved his baggage at a terminal
17 legally, loaded his gun, and killed five people and
18 shot six more. I ask you what could any Broward
19 sheriff deputy --

20 MR. MACIVER: Mr. Special Master, this is
21 nonresponsive to Mr. Primrose's question.

22 SPECIAL MASTER: Please proceed to answer the
23 question that was asked, if you would.

24 BY MR. PRIMROSE:

25 Q. Let me go to this. You mentioned after every

1 major law enforcement event, you and a small group of
2 command staff grouped together, read whatever
3 information you could, and kind of discussed what
4 happened, what could we maybe learn from this, right?

5 A. Yes.

6 Q. And so we know that in 2013, the LAX shooting
7 happened?

8 A. Two thousand what?

9 Q. 2012 or '13?

10 A. I thought it was '12, I'm not sure.

11 Q. Yeah, I think you're right, 2012. But you
12 would have -- at that point, you weren't sheriff, but
13 an event like that, an airport shooting or school
14 shooting or any major event that was probably
15 reported, you would get together and try to learn as
16 much as you can and take some lessons away?

17 A. Absolutely.

18 Q. Okay. Now, you discussed on direct
19 examination about the oper- -- the training exercise
20 that I believe was called Operation Vigilant Port?

21 A. Yes.

22 Q. And that happened in 2015, that exercise,
23 right?

24 A. Yes.

25 Q. Let me make sure that I understand this

1 right. The training started as an exercise where
2 terrorists took over a seaport terminal?

3 A. Yes.

4 Q. It involved a SWAT and hostage negotiators,
5 fire rescue, everybody that might respond?

6 A. Yes.

7 Q. And eventually it transitioned, I think -- I
8 believe he's a major, Major Grant?

9 A. Yes, retired.

10 Q. Retired. Said it was like a twenty -- it was
11 from the show 24, the terrorism moved from the cruise
12 terminal to the airport?

13 A. Yes.

14 Q. And he testified that the intell they got was
15 the terrorists were trying to highjack an actual
16 airplane?

17 A. Correct.

18 Q. Believe he said that BCAD has a
19 decommissioned FedEx cargo carrier that was utilized
20 in the exercise?

21 A. Yes.

22 Q. A car had driven through the fence line, onto
23 the tarmac, and taken over a plane?

24 A. Yes.

25 Q. Never had to go into the terminals, the

1 airport terminals? Exercise didn't include the
2 airport terminals, did it?

3 A. Not to my knowledge.

4 Q. Okay. And do you know if any airport -- any
5 of the deputies that were assigned to the airport
6 actually took place in the -- the part of the exercise
7 that include going onto the tarmac, onto the plane?

8 A. See, I think what you're not understanding is
9 maybe the exercise didn't include the airport
10 terminal, but it did include Publix and it did include
11 the library. It's teaching deputies the concept of
12 how to act to an active killer. It's not specifically
13 about the location. It's about teaching them
14 movements and teaching them how to understand their
15 policies and move forward. There were more places --
16 it wasn't about the beach, it wasn't about the 7-11.
17 It was about teaching deputies how to react during
18 these circumstances. You're not going to be able to
19 train at every venue, sir.

20 Q. Let me ask you this, though: Was that
21 exercise, Operation Vigilant Port, designed to test
22 how BSO and BCAD would deal with evacuating an entire
23 airport terminal, the passengers, the airline
24 employees, or the employees of the airport?

25 A. You'd have to ask Major Grant that. I --

1 Q. You don't know one --

2 A. I was there, but I don't know what the --
3 what the methodology was.

4 Q. Okay. And did I hear correctly on direct
5 examination this morning, I believe you said this,
6 that you were aware of what it takes to stop air
7 traffic at an airport?

8 A. I wasn't aware. I learned that.

9 Q. Okay. So leading up to the Fort Lauderdale
10 airport shooting, you as the sheriff providing law
11 enforcement to the airport, had no idea what it would
12 take to shut down the entire air traffic in the event
13 that there was a large-scale, mass casualty event?

14 A. Is your question -- I want to make sure I
15 understand. Is your question as a sheriff, would I
16 know the protocols of the airport and what the airport
17 director needed to shut down an airport?

18 Q. Yes.

19 A. I would not have any knowledge of that, no,
20 of course not.

21 Q. Would you have any knowledge of how your
22 agency would interact with the airport district in the
23 event of a large-scale active shooter situation within
24 the airport?

25 A. Of course, I would. We would be -- we would

1 do what the airport needed. We don't -- we're an
2 agency that when it's our -- when we're in control and
3 we're in command and we are in charge of a situation,
4 that we would expect other agencies to assist us. And
5 if the airport needed to shut down their airport,
6 whether it was life-threatening or maybe it was an
7 issue, anyway we can help out, we would help out.

8 So, you know, you don't need to -- if a
9 family member needs knee surgery, you don't need to
10 know how to do the knee surgery, just know how to take
11 them to an orthopedic surgeon who can do it. So as
12 long as I know what the -- as long as the airport
13 manager knows what to do and he knows that he can
14 count on me and BSO, we're good.

15 Q. But wasn't there a conflict, though? The
16 testimony I remember was you told BCAD "You need to
17 shut down -- shut down this airport."

18 A. There wasn't a conflict. There was -- we
19 were both experiencing an airport shooting for the
20 first time. It was a horrific incident, and it was
21 what two leaders -- it was a fervent discussion that
22 two leaders would have. The airport director, his
23 mission and scope was to keep the airport open for
24 commerce and do the things he needed to do, rightfully
25 so. And I was supporting that endeavor. But as I

1 said yesterday, when I found out that other people
2 were calling in and we were getting calls of gunshot
3 victim, woman down, I thought -- logically so, I
4 thought that this could be a systematic terrorist
5 attack where they're going to attack different
6 terminals. So I decided to -- having read about 9/11
7 more times than I wish I did, I thought this could be
8 a multi-faceted attack like the Pentagon,
9 Pennsylvania, the twin towers, and I thought that we
10 needed to shut down the airport because we were
11 getting calls of active killing, and I wasn't going to
12 let the airport director continue to have normal
13 operations. So we had a discussion. I told him that
14 I thought he needed to shut down the airport. He
15 agreed with me, he did it, and he shut down the
16 airport and we worked together seamlessly. It was
17 just a -- it was just a normal discussion between
18 leaders.

19 Q. Okay. Now, after the entire incident was
20 over, I don't know if it was the next day or
21 thereafter, but your agency had a policy we need to
22 conduct an after-action report into what happened and
23 create lessons learned?

24 A. There was no policy, we don't -- to my
25 knowledge, there's no policy to do an after-action

1 report. It was -- command staff came to me and they
2 said they felt that we should enter into the exercise
3 of doing an after-action report, was the logical way
4 to approach it. I knew there were lessons to be
5 learned from us and others, and I approved the -- the
6 compilation of that report.

7 Q. Okay. So -- and you understand that Major
8 Angelo Cedenno was chosen to be the lead author or
9 the -- the leader of this effort to do an after-action
10 report?

11 A. No, that's incorrect. He was chosen to be a
12 gatherer of facts. I hope I didn't, you know,
13 trivialize my analogy yesterday, but he was basically
14 sent out to buy the ingredients. There were many,
15 many other chefs and cooks who were going to put that
16 final report together. He was just gathering the
17 facts.

18 Q. Okay. He was selected to gather facts and he
19 was assisted by an Executive Lieutenant Furman, right?

20 A. He was an executive lieutenant --

21 Q. Do you know if he was credited as being a
22 contributing author?

23 A. I don't know that.

24 Q. Okay. And what about the inclusion of Deputy
25 Vincent Torres as a research, intelligence, and

1 coordination contributor?

2 A. Don't know that.

3 Q. Okay. I don't think that this is what you
4 meant, but I want to give you the opportunity to tell
5 me if -- what you actually meant. Major Ceden0 was
6 not some first-year, low-level road cop, was he?

7 A. Not at all.

8 Q. In fact, when Major Ceden0 was chosen to go
9 out and get the ingredients, as you say, he was
10 actually a major within Broward Sheriff's Office?

11 A. Yes. If I said anything to trivialize his
12 importance, thank you for correcting that on the
13 record because, no, he was a quality leader who was
14 given that assignment.

15 Q. Yeah, and I've got bio here, and it says he
16 had been with Broward Sheriff's Office since 1989. Do
17 you have any reason to disagree with that?

18 A. No reason to disagree with that.

19 Q. And he's held everything from a deputy
20 sheriff in the Department of Detention, Central
21 Booking, through sergeant of a road patrol division,
22 auto theft task force. He was then the lieutenant of
23 the City of Pompano Beach district, an executive
24 lieutenant, a captain, and then now -- now a major.
25 That is a significant promotion within the ranks of

1 the sheriff's office, right?

2 A. I would say so.

3 Q. Okay. And my understanding is that when he
4 drafted -- or when he was asked to -- when he was
5 asked to go gather the ingredients, he was the major
6 over the Department of Professional Standards,
7 Division of Internal Affairs, Public Corruption and
8 Internal Audit?

9 A. I think that's correct.

10 Q. That a pretty high-level position, right?

11 A. I think so.

12 Q. Would that be considered command staff?

13 A. Yes.

14 Q. Okay. And as part of that, he would have
15 actually conducted managerial duties as part of that
16 role?

17 A. Yes.

18 Q. He would have been in charge of analyzing how
19 his subordinates are doing in their jobs?

20 A. Yes.

21 Q. He would be able to pinpoint if there were
22 deficiencies in the individuals that he had working
23 within his department?

24 A. Yes.

25 Q. Okay. And so when Major Cedeno is going out

1 there, this is more than just, again, some newer law
2 enforcement officer just going out and doing
3 interviews or pulling documents or reviewing footage,
4 this is a guy who has spent 25 to 30 years in law
5 enforcement and knows what he's looking for, right,
6 knows to spot out good and bad?

7 A. Major Cedeno went out there, I'm proud of the
8 rank he established and I'm proud of him as an
9 individual, but nothing changes with my answer. He
10 went out there to look for facts, opinions, and
11 nothing changes with my answer. He just went out
12 there to find the ingredients. He was only one
13 person, and a plethora of people were going to review
14 the report.

15 Q. Let me ask the question this way: You don't
16 necessarily discount the opinions that Major Cedeno
17 put in his report, do you?

18 A. Absolutely not.

19 Q. They are valid opinions of Major Cedeno based
20 on his 30-plus years of experience in law enforcement
21 and a major over professional -- the Department of
22 Professional Standards?

23 A. As I like to say, everybody's entitled to
24 their own opinion, but nobody's entitled to their own
25 set of facts, so he went out and gathered facts,

1 opinions, and certainly a lot of other people -- it
2 was -- to get an accurate document, it was necessary
3 that many people weigh in on it.

4 Q. Okay. And Major Cedeno, along with Executive
5 Lieutenant Furman and Deputy Torres, they were doing
6 just that, they were going out and gathering facts,
7 right?

8 A. I don't know what they were doing. They
9 were -- I can't testify as to what Furman and Torres
10 were doing.

11 Q. Did any of your command staff, after
12 authorizing Major Cedeno to go do this, tell you,
13 "Hey, as an update, here's who he's going to talk to,
14 here's" --

15 A. No.

16 Q. -- "any meetings he's having"?

17 A. No.

18 Q. Okay. So want to show you -- this is
19 Governor's Exhibit C, and this is the first draft that
20 was issued by Major Cedeno. And Major Cedeno in --
21 and this is on EOG Bates stamp 63 -- puts a section
22 called "Meetings, Debriefs, Summits, and Proposals,"
23 and he goes through everything that they did in
24 preparation for this. January 20th, he meets with BSO
25 airport district command, and they discuss a whole

1 plethora of topic areas, right?

2 A. Right.

3 Q. Topic areas related to staffing, terminal,
4 personnel assignments, current initiatives, trends,
5 stats, airport extension -- or expansion, excuse me,
6 and all the stakeholders, right?

7 A. Right.

8 Q. And a few weeks later, Major Cedeno on
9 February 15th and Colonel Polan meet with airport
10 command captain to discuss a review of the timeline of
11 events, look at video surveillance, right?

12 A. Right.

13 Q. Two days later, February 17th, Major Cedeno
14 meets with Fort Lauderdale PD and fire rescue
15 emergency management to discuss their interaction
16 during the events?

17 A. Correct.

18 Q. March 1st, Major Cedeno chairs a formal BSO
19 debrief on the active shooter situation, including
20 agency department heads that played a role in it,
21 right?

22 A. Right.

23 Q. So he's got BSO -- what I'm going to call
24 senior staff from different agencies. He's got
25 airport district, criminal investigations, SWAT, CSU,

1 crime scene unit, investigations, COMs (phonetic),
2 fire rescue, Department of Law Enforcement, he has all
3 of those folks in a debrief on March 1st, right?

4 A. Yes.

5 Q. And it even says, if you go further, that
6 those individuals were able to speak at the debrief
7 about their experiences and observations, right?

8 A. Right.

9 Q. It says there that they were able to discuss
10 recommendations and perceive strengths and areas of
11 improvement?

12 A. I just want to ask you a question for
13 clarification. The document that you're showing me,
14 it has the word "draft" going across it. Is that
15 something that Major Cedeno had on it when you got
16 this document? Did it have the word "draft" across
17 it?

18 Q. This document, the only way that it has been
19 altered, sir, is the highlights that I put on it.

20 A. Okay. So, then, as you can see as you show
21 me that document, even Major Cedeno knew when he wrote
22 it, he has the word "draft" on it. So it wasn't
23 written with any finality. He knew he could write
24 whatever he wanted and put in whatever we needed to
25 read, because in his mind, he knew it was a draft, he

1 knew this wasn't even anywhere near the final
2 document. It's just a simple draft.

3 Q. Completely understand it's a draft, but the
4 draft -- let me ask it this way: You're in no way
5 saying that Major Cedeno put things into a draft that
6 were -- that were patently false?

7 A. No.

8 Q. So if Major Cedeno puts that on March 1st,
9 2017, he meets with all of these senior staff at
10 different agency departments and they discuss their
11 observations, recommendations, strengths and area of
12 improvement, you don't have any reason to believe that
13 that did not happen?

14 A. I have no reason to believe that, no.

15 Q. Okay. Keep going, March 10th, Major Cedeno
16 and Colonel Polan meet again with BCAD to discuss
17 their areas of concern, conversations, some proposals,
18 and then as I've highlighted, in Major Cedeno's
19 opinion, part of this meeting was that a tac- -- "The
20 tactical posture of the Fort Lauderdale airport was
21 deficient and several years behind local surrounding
22 airports and national/international airports in the
23 areas of tactical presence and response, training and
24 counter-terrorism strategies."

25 Now, do you agree with that statement, the

1 highlighted one I just read?

2 A. Can you read it again, please?

3 Q. You want me to read it out loud?

4 A. If you can.

5 Q. So the highlighted portion there at the
6 bottom, this is what Major Cedeno puts as an
7 observation from the March 10th, 2017, meeting Major
8 Cedeno and Colonel Polan had with the BCAD division
9 director, Mark Gale, and he wrote: "The tactical
10 posture of the" -- and I'm going to say it the way
11 that it's written -- "FLL airport is deficient and
12 several years behind local surrounding airports and
13 national/international airports in the areas of
14 tactical presence and response, training, and
15 counter-terrorism strategies."

16 Do you disagree with that statement?

17 A. I might. I mean, I don't know enough about
18 it to agree or disagree. I don't know -- I would ask
19 Major Cedeno what other airports you spoke to. Is
20 this just one person who said it -- you know, opinion?
21 Is this something you can document? You know, you
22 need more than a statement. What other airport
23 directors were spoken to? What other tactical units
24 were spoken to? So I don't know where he developed
25 that information, and that's why these are drafts and

1 not final products.

2 Q. But, again, as you've already said, you don't
3 believe that Major Cedeno put anything in the report
4 that would be patently false?

5 A. No, but I don't -- I can't say without -- you
6 know, with certainty that his observations were
7 correct or myself or command staff would have the same
8 observations or come to the same opinions. He was a
9 highly decorated and important member of command
10 staff, but he was one of 30 members, and 30 other
11 people were going to weigh in on it. So to say what
12 he said is the actual way, you know, I mean, he put
13 down this about the airport, but we would have to talk
14 to, you know, other airports and where did he get that
15 information from. I would have a lot more questions.

16 Q. Okay. So March 15th, now Major Cedeno and
17 Furman go to Miami-Dade airport district and meet with
18 a major there, and it says that they actually saw a
19 physical exercise presentation that included some
20 discussion about outline missions, standards of
21 operation, and criteria for deployment. So at least
22 there, it looks like Major Cedeno went to another
23 airport district and saw maybe how they were doing
24 things?

25 A. Correct.

1 Q. Okay. Two weeks later, it says Major Cedeno,
2 along with Colonel Polan and a captain, actually
3 attended a round table with Congressman Debbie
4 Wasserman Shults, right?

5 A. Yes.

6 Q. So at least there was an understanding within
7 BSO that the person told to go gather the ingredients
8 was being trusted enough to have formal discussions
9 with members of Congress about what he was learning
10 and what they were seeing in the lessons learned?

11 A. That's exactly what -- you know, what we
12 wanted. That's what an after-action report does, it
13 sends you to places where you can tell others what you
14 did right and what you did wrong, and the goal is
15 lessons learned, areas of improvement, and how can we
16 get better, and that's what he was out there doing,
17 trying to find out how we can get better.

18 Q. So are you suggesting that the formal round
19 table he had with Congressman Debbie Wasserman Shults
20 was so that he could learn ways to do it better?

21 A. No, I'm sure it was probably a debriefing
22 from him to her about what we've learned so far.

23 Q. Okay. And it says in there, at least what
24 Major Cedeno writes, is that they actually discussed
25 mass evacuations, planning, gaps in security, training

1 exercises, policy revisions. Those are conversations
2 that he was trusted to have with a member of Congress
3 about the lessons learned from the Fort Lauderdale
4 airport shooting?

5 A. Correct.

6 Q. Okay. And we go -- and a couple weeks later,
7 he's now flying to New York City to -- to have a
8 discussion with Port Authority of New York and New
9 Jersey Police Department about addressing terrorist
10 threats and experiences that they've learned on
11 attacks at airports?

12 A. Correct.

13 Q. So, again, I mean, he's trusted to be an
14 outward-facing person for Broward Sheriff's Office on
15 the information he's gathered and the opinions he has
16 about what we need to learn from this incident?

17 A. I don't dispute that.

18 Q. Okay. And we know that sometime in April,
19 Major Cedeno did another briefing with BSO senior
20 staff. I believe -- let's see. I believe we've got
21 right here on April 10th, it says he met with a formal
22 meeting at BSO headquarter with all incident
23 management, and then April 12, 2017, a formal debrief
24 with BCAD on it as well. So we've got a timeline of
25 all the different events that Major Cedeno -- all the

1 meetings he had, round tables, and discussions prior
2 to the releasing of his first draft?

3 A. I'll agree with you, we have a timeline.

4 Q. Okay. So we know based on this report that
5 the draft was completed on or about May 3rd of 2017,
6 but if I understood you correctly, you actually never
7 read the first draft?

8 A. I did not.

9 Q. So you had no idea what actual observations
10 or recommendations were made from the individual
11 chosen to go gather the ingredients and write them
12 down?

13 A. I don't know if -- I don't remember, I can't
14 recall now if I had discussions with other members of
15 command staff about some of his take-aways, but I --
16 I'm just telling you I didn't read the draft at that
17 point.

18 Q. Okay. You do know that at some point,
19 somebody within -- a senior staff at BSO wanted
20 another review of the first draft?

21 A. Say that again.

22 Q. Somebody within BSO --

23 A. Who?

24 Q. No, no, that's my point. Somebody higher
25 than Major Cedeno wanted his -- Major Cedeno's draft

1 to be looked at, a second set of eyes, another round
2 of revisions, right?

3 A. Is that a question?

4 Q. Yes. That's your understanding?

5 A. No, that's not my understanding. Who --

6 Q. You don't --

7 A. Who are you telling me would have asked for
8 that request? I'm not sure I'm following you.

9 Q. So you know -- you know Captain Diefenbacher?

10 A. Yes.

11 Q. And I believe you testified you read his
12 deposition --

13 A. Yes.

14 Q. -- right?

15 And you saw where Captain Diefenbacher said
16 either Colonel Polan or an assistant general counsel
17 asked him to look at Major Cedeno's report?

18 A. I thought that eventually came from the
19 undersheriff, but I would agree with you.

20 Q. Okay. And that's my point. Somebody else
21 looked or found Captain Diefenbacher and said, "you're
22 trusted, you're an attorney. We want you to take a
23 look at Major Cedeno's report"?

24 A. No. It wouldn't have been that way, take a
25 look at major's report. There would have been a

1 logical next step. It would have just been the second
2 step in the progression of doing an after-action
3 report. It wouldn't have been "We want you to take a
4 look at Major Cedeno's," it would have been
5 preplanned. Major Cedeno is going to do the initial
6 work, he's going to do the work-up, and then it's
7 going to go to -- the etymology of it is that it's
8 going to go to a round table or one other person or
9 two other people, and eventually it's going to work
10 its way up to a final product that I'm going to review
11 before it gets published.

12 Q. Well, you remember reading in Captain
13 Diefenbacher's testimony where he said he was
14 approached by -- and I think you might be right --
15 Undersheriff Kinsey?

16 A. That's -- I think so.

17 Q. Or an assistant general counsel to look at
18 the report because there was a public records request
19 from I believe *The Sun Sentinel* asking for the report?

20 A. Yeah, I remember the public records request
21 coming in clearly and I remember being briefed on
22 that. But like I said, it wouldn't be to over -- you
23 know, to review and grade Major Cedeno's work. It
24 would have been a logical next step.

25 Have you ever been part of an after-action

1 report before? I mean, do you know how it goes?
2 Because it's going to be a document that you want to
3 make sure is as good as it could be to teach and to
4 learn and what not to do, what we did wrong, and what
5 we did right. And we're not ashamed to put areas of
6 improvement in. I've never been on any operation yet
7 that's been perfect. Even our Safe SWAT operations,
8 nobody goes home until we go in the room and we
9 debrief. We go into the SWAT locker room and we
10 debrief, did it go good. Even if -- some briefings
11 last five minutes, some 50 minutes, but it was just
12 a -- a next step, sir.

13 Q. Okay. If Captain Diefenbacher testified that
14 he was asked to look at it because there were some
15 grammatical issues and, in his words, the report was
16 too emotional and non-pragmatic, you wouldn't disagree
17 that that's what he said?

18 A. If Captain Diefenbacher testified to
19 something, I wouldn't disagree with it, no.

20 Q. Okay. Now, you never looked at Captain
21 Diefenbacher's draft, what we'll call the second draft
22 of the report?

23 A. No.

24 Q. So you don't know if there were some areas of
25 improvement that he kept from Major Cedeno's version?

1 A. I just told you I didn't look at it.

2 Q. Okay. And I'm not going to go through all of
3 these with you, but you would agree with me that you
4 have no idea if there were areas of improvement that
5 both Major Cedeno and Captain Diefenbacher believed
6 should be in the report that were ultimately cut out
7 of the final critical incident report that you signed
8 off on?

9 A. That would have been at the level of
10 lieutenant colonels, colonels, and undersheriff to
11 decide, and I wouldn't have been involved in that. I
12 would have been involved at -- when I should have
13 been, at the very -- before the final product was
14 released and I had a chance to weigh in on it.

15 Q. Well, you keep saying "when I should have
16 been involved," but don't you want to know what the --
17 the major who's been over professional standards and a
18 captain who had legal experience, and you testified
19 this morning he was an amazing leader, had long
20 experience, don't you want to know what those two
21 individuals say are areas of improvement to them?

22 A. I want to know everything. I want to know
23 the reports that Treijs -- I want to know what he did.
24 I'd like to know about the 750,000 reports that come
25 in. You have -- you work with an agency with almost

1 6,000 people and you work and serve a community of two
2 million, you can't know everything and you can't want
3 to know everything, because then you get caught up in
4 not -- in not doing the things that you need to do.
5 The men and women I put in place as colonels, majors,
6 captains, and lieutenant colonels, they know at what
7 point they need to sit down and address issues with
8 me. So I hope I answered your question.

9 Q. But, see, that's where I've got a concern
10 now, because this airport shooting was a big deal,
11 right?

12 A. Right.

13 Q. This is not a -- a traffic stop that went
14 wrong, it's not a -- it's not a robbery. This is a
15 mass casualty event at one of the fastest-growing
16 airports in the country, and you're saying you just
17 relied on what your undersheriff was telling you this
18 is what should be important to you?

19 A. No, I relied on a command staff, starting
20 with Major Cedeno gathering facts, gathering
21 opinions --

22 Q. But if you rely on Major Cedeno --

23 MR. KUEHNE: Objection; cut off the witness
24 during a responsive answer.

25 SPECIAL MASTER: Please let him finish, but

1 try to be brief in the answer. Please continue.

2 THE WITNESS: Yes, sir.

3 As we -- as was testified this morning, I
4 think the report took 10 months to complete. I
5 didn't rely on the undersheriff. I relied on
6 everybody to be doing their jobs. And if you
7 read -- and I did, I'm sure you did too -- the
8 final product, the final product was excellent.
9 It talked about the positives and the things --
10 the areas for improvement, and I think that's what
11 an after-action report should do and did do. So I
12 was really proud of the way the agency came
13 together to develop that product.

14 BY MR. PRIMROSE:

15 Q. Do you believe that there are more than three
16 drafts of the report done on Fort Lauderdale airport
17 shooting?

18 A. I don't know how many drafts there were.

19 Q. If I told you that through requesting
20 these -- of all drafts through Sunshine, was given one
21 draft dated May 3rd, 2017, Major Cedeno's, another
22 draft dated June 2nd, 2017, Captain Diefenbacher's,
23 and then the critical incident report that I believe
24 was issued October 6 of 2017 as the full universe of
25 drafts that existed of this, you don't have any reason

1 to believe that there was a fourth, fifth, sixth, and
2 seventh versions --

3 A. No.

4 Q. -- of this?

5 A. No.

6 Q. Okay. So we're not talking about thousands
7 of drafts that you would have to look at to determine
8 the full scope of what happened and what were areas of
9 concern to Major Cedeno and Captain Diefenbacher,
10 right?

11 A. What's your question?

12 Q. Well, my question is you're saying there's
13 all of these calls that come in, but there was one
14 Fort Lauderdale airport shooting, there were two draft
15 versions and one critical incident report. These are
16 not thousands of pages of documents that you couldn't
17 read through the two draft versions to say "Let me see
18 what the other -- the front-line person who did this
19 said and let me compare it to what Undersheriff Kinsey
20 is telling me should go in the final report"?

21 A. I read the final product and -- I don't know
22 what -- I read the final product.

23 Q. Okay. And because you read the final
24 product, you did not know at that time that Major
25 Cedeno and Captain Diefenbacher included this area of

1 improvement listed at EOG 00070 about an area of
2 enhanced active shooter training lesson plans and the
3 implementation of an active shooter vetting process,
4 or the second one about enhanced training specific to
5 the BSO airport district and partner agency personnel?

6 A. I did know about that, not through the rough
7 draft, but I had conversations with the undersheriff
8 about those issues. So just because I didn't read the
9 rough draft doesn't mean the undersheriff or Colonel
10 Polan wouldn't have taken aspects out of the rough
11 draft or facts that they learned and told me about
12 what -- you know, what they thought we needed to do to
13 be a safer agency. So that's not necessarily true.

14 Q. Okay. Did the undersheriff also tell you
15 about Major Cedeno's highlighting of a concern about
16 complacency with the BSO district staff?

17 A. I don't remember.

18 Q. This one right here on Bates stamp EOG 00070,
19 "Area of Improvement 3: BOS district personnel,
20 though many are tenured, must avoid complacency based
21 on their environment and a perceived sense of
22 security. BSO deputies assigned to the airport
23 district can mistake the assignment as a lessened
24 exposure to harm or perceived retirement when the
25 contrary is highly needed to vigilantly address and

1 deter active shooter and bombing si- -- events.
2 Historically it has been an accepted practice, but
3 times have changed immensely, requiring a global view
4 to assigned personnel."

5 Did Undersheriff Kinsey tell you about that
6 area of improvement?

7 A. No, but just reading it now, that just seems
8 like the opinion -- that would be Major Cedeno's
9 opinion. I would doubt seriously he would have went
10 to the airport or served any time out there and been
11 able to make these evaluations at that time.

12 Q. Okay. So this is one area of improvement
13 that you believe Major Cedeno might not have actually
14 gotten the information to come up with this opinion?

15 A. No, I'm not saying that. I'm just saying
16 that was an opinion and -- sounds like an opinion,
17 that's all I'm saying.

18 Q. An opinion of a captain and a major over the
19 Department of Professional Standards wrote that?

20 A. Right. I mean, how he -- I would -- my
21 question to him if he were here is I'd say "How do you
22 know about complacency at the airport, and if there is
23 complacency out there, then, you know, what are the
24 sergeants, what are the lieutenants, what are they
25 doing about that?" So, I mean, it's a --

1 Q. But again, you didn't know that that was an
2 area of concern when Undersheriff Kinsey brought you
3 the final critical incident report, right? Because I
4 can submit to you that that area of concern is
5 completely absent from the critical incident report
6 that was finalized in October.

7 A. I don't remember hearing that, but whether --
8 and I don't know what -- I can't speak for Major
9 Cedenno, but I know -- look, I'm not -- no sheriff, no
10 leader's going to support complacency by their men or
11 women, but whether there was complacency in doing work
12 out at the airport, let's be crystal-clear and fair to
13 our community, that was going to have nothing to do
14 with a man getting off a plane and shooting five
15 people. So to correlate one to the other is grossly
16 unfair to the Broward Sheriff's Office.

17 MR. PRIMROSE: Okay. I'm just going to
18 submit for the record, Special Master, that all
19 three versions are listed as Governor's Exhibits
20 C, D, and E, and we will let them stand for
21 themselves.

22 SPECIAL MASTER: That's fine. Let me -- I
23 hate to interrupt, but let me just -- how much
24 longer do you think you're going to be in the
25 cross examination, Mr. Primrose? I want to try to

1 manage the time. I'm sensitive to the court
2 reporter who's been at it for a while now, and I
3 want to schedule a break, but I don't want to --
4 I'd just like some indication of how much longer
5 you think you might be.

6 MR. PRIMROSE: At least an hour.

7 SPECIAL MASTER: Okay. Let's go ahead and
8 take a break now and let's reconvene at 1:15.

9 (Brief recess.)

10 (Proceedings continued in Volume IV.)

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

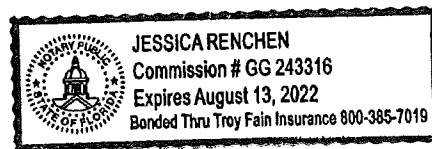
CERTIFICATE OF REPORTER

I, JESSICA RENCHEN, Registered Professional Court Reporter, certify that I was authorized to and did stenographically report the foregoing proceedings and that the transcript is a true and complete record of my stenographic notes.

DATED this 19th day of June, 2019.

Jessica Renchen

JESSICA RENCHEN, Court Reporter



TRANSCRIPT
CONDENSED

1 THE FLORIDA SENATE 308
2
3 IN RE: EXECUTIVE ORDER OF SUSPENSION, NUMBER 19-14,
4 Suspension of Mr. Scott Israel, Sheriff
5 Broward County, Florida /
6
7
8 VOLUME III
9 (Pages 308 through 471)
10 TRANSCRIPT OF PROCEEDINGS
11 HEARING FOR REVIEW OF
12 EXECUTIVE ORDER OF SUSPENSION
13
14 DATE: June 19, 2019
15 TIME: 9:00 a.m. - 12:40 p.m.
16 LOCATION: Room 110, Senate Office Building
17 404 South Monroe Street
18 Tallahassee, Florida 32399
19 BEFORE: Dudley Goodlette, Special Master
20
21
22 Reported by:
23 JESSICA RENCHEN, Court Reporter
24 For the Record Reporting, Inc.
25 1500 Mahan Drive, Suite 140
Tallahassee, Florida, 32308

FOR THE RECORD REPORTING TALLAHASSEE FLORIDA 850.222.5491

1 INDEX OF WITNESSES 310
2
3 WITNESS PAGE
4 SCOTT ISRAEL 318
5 Continued Direct by Mr. Kuehne 385
6 Cross Examination by Mr. Primrose
7
8 ****
9
10 REPORTER'S PAGE 471
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

FOR THE RECORD REPORTING TALLAHASSEE FLORIDA 850.222.5491

1 APPEARANCES OF COUNSEL: 309
2 On behalf of Governor DeSantis:
3 NICHOLAS A. PRIMROSE, ESQ.
4 JOHN MACIVER, ESQ.
5 Deputy General Counsel
6 Executive Office of The Governor
7 The Capitol, PL-05
8 Tallahassee, Florida 32399
9 E-mail: Nicholas.primrose@eog.myflorida.com
10
11 On behalf of Sheriff Israel:
12 BENEDICT P. KUEHNE, ESQ.
13 Kuehne Davis Law, P.A.
14 100 S.E. 2d Street, #3550
15 Miami, Florida 33131-2154
16 Phone: 305-789-5989
17 E-mail: Ben.kuehne@kuehnelaw.com
18
19 STUART N. KAPLAN
20 Kaplan & Parker, LLP
21 3399 PGA Blvd, Suite 150
22 Palm Beach Gardens, Florida 33410-2809
23 Phone: 561-296-7900
24 E-mail: Skaplan@kaplanparkerlaw.com
25

FOR THE RECORD REPORTING TALLAHASSEE FLORIDA 850.222.5491

1 P R O C E E D I N G S 311
2 (Proceedings continued from Volume II.)
3 SPECIAL MASTER: Good morning. It's 9:00
4 a.m. on Wednesday, June 19th, and this is the
5 continuation of the final hearing with regard to
6 Executive Order of Suspension 19-14, suspension of
7 Scott Israel, Sheriff of Broward County.
8 Counsel, before hearing further testimony
9 from Sheriff Israel this morning, there is a brief
10 procedural matter that I would like to discuss.
11 At the conclusion of the hearing, I will be
12 requiring the parties to submit proposed findings
13 of facts and conclusions of law. I would like to
14 have those submissions staggered, with the
15 governor's brief coming a week before the
16 sheriff's -- Israel's brief. I would encourage
17 the parties to -- during the break today to
18 discuss the -- and see if they can consent to a
19 timeframe for these submissions, and if that can't
20 be accomplished, if you're not able to do so, then
21 I will enter an order with a briefing schedule
22 after the hearing.
23 Also, given that the parties will have an
24 opportunity to present their case in writing, I
25 plan to forego closing statements today.

FOR THE RECORD REPORTING TALLAHASSEE FLORIDA 850.222.5491

1 And you may now proceed. At the conclusion ³¹²
2 yesterday, we were under direct examination of
3 Sheriff Israel. And just remind Sheriff Israel,
4 as you jump back on the witness stand, that you
5 are still under oath.

6 THE WITNESS: Yes, sir.

7 SPECIAL MASTER: Please proceed, Counsel.

8 MR. KUEHNE: Special Master, we do have one
9 item we want to add to the record to preserve the
10 record. It will just take a moment.

11 SPECIAL MASTER: Okay, sir.

12 MR. KAPLAN: Special Master, if I may?

13 SPECIAL MASTER: Mr. Kaplan.

14 MR. KAPLAN: Thank you.

15 Special Masters, good morning. As you
16 recall, one of the first things that I did
17 yesterday morning was obviously we addressed our
18 concern with respect to whether or not in any way
19 Scott Israel's due process rights may be at risk
20 with respect to the failure to be able at this
21 point to have the benefit of the FDLE
22 investigation.

23 As you know, there were -- it's been made
24 public that there were over 180 witnesses who were
25 interviewed, as well as 200 or 200 plus

FOR THE RECORD REPORTING TALLAHASSEE FLORIDA 850.222.5491

1 know, that would be an automatic mistrial, and ³¹⁴
2 certainly that government attorney would be dealt
3 with and probably sanctioned for those type of
4 comments.

5 Notwithstanding, we let it go. Obviously,
6 there has been the undertone of our concern that
7 the removal of Scott Israel was not based upon any
8 merits or facts, but it was politically motivated,
9 and we do know that several months ago when
10 Governor DeSantis was making his speech before the
11 Florida Senate almost as if to strong-arm the
12 senators, he made it well-known that anybody who
13 would vote against his suspension or removal of
14 Scott Israel may have to deal with him later on.
15 And that's certainly -- we took that as a clear,
16 overt threat.

17 Notwithstanding, Your Honor, after last
18 night's proceedings, and notwithstanding that
19 these proceedings are still open, the fact that we
20 have not had an opportunity to present our closing
21 remarks and certainly to allow the process to take
22 its course, Governor DeSantis went on record last
23 night and, quote, said, "It is shameful Israel is
24 still fighting the reasons for his dismissal when
25 his wrongdoings as sheriff are so clear." Now,

FOR THE RECORD REPORTING TALLAHASSEE FLORIDA 850.222.5491

1 investigative reports. And one of my concerns to ³¹³
2 you, Special Masters, was not only whether or not
3 actual due process may be at risk, but also, as
4 you know, the appearance of due process is always
5 called into question, especially when we talk
6 about what the public's perception is.

7 It wasn't two seconds after I sat down,
8 Special Masters, that the governor's attorney
9 stood up in his opening statement to you. And it
10 is interesting to me that sometimes government
11 attorneys, whether they're on the state level,
12 local level, or federal level, fail to realize
13 that they are still regulated under the Florida
14 Bar, as well as the ABA, with respect to the code
15 of conduct, as well as the ethical requirements.
16 And you may recall, Special Masters, that the
17 governor's attorney called out Scott Israel as by
18 contesting these -- this removal as,
19 quote/unquote, being shameful. Mr. Primrose said
20 on the record that it is shameful that Scott
21 Israel is basically coming before Your Honor in
22 contesting this removal. I equated that statement
23 as if a prosecutor in a criminal case was to
24 identify in a closing argument the failure of a
25 defendant taking the witness stand. As you would

FOR THE RECORD REPORTING TALLAHASSEE FLORIDA 850.222.5491

1 sir, you can only interrupt those statements as ³¹⁵
2 trying to influence the ultimate decision-maker in
3 these proceedings. And that is of great concern
4 to Scott Israel, to Mr. Kuehne, and to myself,
5 because as a practicing attorney, having been
6 admitted to the New York State Bar 30 years ago, I
7 stand before you with a tremendous respect and
8 deference and understanding that while some may
9 look at the practice of law now in this day and
10 age in 2019 more like a sporting contest other
11 than what it should be in the application of the
12 administration of justice and to ensure that
13 justice is administered equally and fairly, I am
14 concerned and I wanted to call to your attention
15 so that we would make a record of our concern
16 that, again, the governor and through his
17 attorneys have made these type of statements that
18 certainly would cause condemnation in the public's
19 eye, as well as his attempt to circumvent the
20 process and interfere and try to coerce or
21 influence the ultimate decision-makers. And so I
22 just wanted to call that to your attention and
23 make a note of it and certainly make a record of
24 it.

25 SPECIAL MASTER: Let me just say -- I want to

FOR THE RECORD REPORTING TALLAHASSEE FLORIDA 850.222.5491

ask Mr. Primrose to respond, but let me just say³¹⁶
that whatever comments the governor has made will
not influence the report that I am going to
provide to the senate president.

Mr. Primrose.

MR. KAPLAN: May I just say I appreciate that
response, sir.

SPECIAL MASTER: Mr. Primrose.

MR. PRIMROSE: First of all, it's deeply
concerning that as a member of the bar, that there
even be an accusation that I somehow committed
unprofessional or unethical conduct. However, Mr.
Kaplan, if he feels that that has happened, there
is an appropriate procedure to do that, and I
certainly would enjoy my due process rights if he
believes that I've somehow violated my oath to the
Florida Bar and the professional rules of conduct.

What I will say is this: That the Florida
voters in 1968 approved an amendment to the
Florida Constitution giving the Florida Senate the
power to develop the rules and procedures, that
the Florida Senate would conduct a removal or
reinstatement process. It's the Florida Senate's
rules and procedures on what is due process. This
procedure is due process. It's open to the

FOR THE RECORD REPORTING TALLAHASSEE FLORIDA 850.222.5491

public. The governor is an independently-elected³¹⁷
official who can make comments about why he chose
to suspend Scott Israel from office. And Scott
Israel is provided the opportunity to come before
the senate and the entire media and make his case
for why he thinks that he should not be removed
from office.

But I will say this: There are 40
independently-elected Florida senators that will
read your report and they will take into
consideration all of the evidence and testimony
provided by Scott Israel and the governor's office
in making their decisions, and I would assume that
all 40 independently-elected Florida senators will
make their decisions based on their thoughts and
opinions, not based on what any other elected
official in the State of Florida says.

SPECIAL MASTER: Thank you, Mr. Primrose.
Let me just say that the statements that have been
made are now part of the transcript.

Okay. Let's please continue with the
proceedings. Your witness, Mr. Kuehne.

MR. KUEHNE: Thank you.

SPECIAL MASTER: And, Sheriff, you're still
under oath, if you will.

FOR THE RECORD REPORTING TALLAHASSEE FLORIDA 850.222.5491

THE WITNESS: Understood, sir.³¹⁸

CONTINUED DIRECT EXAMINATION

BY MR. KUEHNE:

Q. Good morning, Sheriff. When we broke last
night, we were speaking about the Fort
Lauderdale-Hollywood Airport shooting. Do you recall
that?

A. I do.

Q. And I had posed a number of observations to
you that were raised by the governor in support of the
position that you were negligent or incompetent. Do
you recall that section?

A. I do recall that.

Q. So let me -- let me continue.

SPECIAL MASTER: Mr. Kuehne, is your
microphone on?

(Discussion off the record.)

BY MR. KUEHNE:

Q. The governor's bench memorandum submitted in
this case -- and you've read that, right?

A. I have.

Q. -- includes this statement in support of
the -- the governor's suspension claim. And it says,
and I'm quoting, this is at page 5, "While not an
exhaustive recitation of the initial draft report's

FOR THE RECORD REPORTING TALLAHASSEE FLORIDA 850.222.5491

findings, it reveals faults with BSO, especially given³¹⁹
the November 1, 2013, shooting that occurred at the
Los Angeles International Airport and acts of
terrorisms that have elevated the need for efforts to
protect airport." That's the statement.

Is it your understanding that the initial
draft report done by the officer was vetted by others,
not by you?

A. The initial report, to my knowledge, was not
vetted by anyone, it was just turned in.

Q. It was reviewed after it was turned in?

A. Yes.

Q. And then vetted by others, not by you?

A. That's correct.

Q. There were command staff-level meetings?

A. Yes.

Q. Did you direct or order anything about how to
go through the process of working from that initial
draft report to get it into the final official
version?

A. Not at all.

Q. Who was in charge of that --

A. Ultimately --

Q. -- process?

A. Ultimately, the undersheriff was in charge of

FOR THE RECORD REPORTING TALLAHASSEE FLORIDA 850.222.5491

1 the process.

2 Q. The undersheriff had that responsibility?

3 A. Yes, he did.

4 Q. And then once that's done, you're the final
5 authority?

6 A. That's correct. I would take the final
7 responsibility for the end product.

8 Q. And you explained how that process got to
9 you?

10 A. I did.

11 Q. Was BSO in the Sheriff Israel tenure focused
12 on and did it learn from the events at the Los Angeles
13 airport?

14 A. Absolutely.

15 Q. That was another attack, right?

16 A. It certainly was.

17 Q. And did that become part of the BSO process
18 of understanding what might happen in our community?

19 A. Yes. Actually, at the Broward Sheriff's
20 Office, I particularly on purpose made sure that our
21 command staff was diversified regarding talents and
22 how we all came to the ranks of colonel and lieutenant
23 colonel and majors. And we had about three or four of
24 our upper command staff, including myself, who were
25 former SWAT commanders. So we understood the adage

FOR THE RECORD REPORTING TALLAHASSEE FLORIDA 850.222.5491

1 there safer.

2 Training -- we throw the word "training"
3 around, but training is an ever-evolving thing. Every
4 time a critical incident happens, police train
5 differently. We learned from Columbine. Now we do
6 things a different way.

7 And my biggest take-away, Mr. Kuehne, at
8 Marjory Stoneman Douglas was we realized that we want
9 to enter a building as soon as possible and we want to
10 do one of three things: We want to eliminate the
11 target, we want to arrest the target, we want to have
12 the target flee or barricade himself or herself
13 without hostages. And as we went through Stoneman
14 Douglas, we realized that although the killer was
15 already gone, we no longer want to continue to push
16 forward. If we don't know where the killer is, we
17 want to stop and triage and we want to start to save
18 lives.

19 One thing the governor never brought out -- I
20 don't even know if they know -- is that police, Coral
21 Springs, BSO, and other police officers -- I'm not
22 talking about paramedics, but police transported 19
23 gunshot victims to area hospitals that day, and 17 of
24 those 19 lived because of our training, because we had
25 tourniquets, because we had the equipment we needed,

FOR THE RECORD REPORTING TALLAHASSEE FLORIDA 850.222.5491

1 when we were young in this profession, we understand
2 that when people need police, they call 911. When the
3 police need police, they call SWAT. So I've always
4 understood how important it is to be cognizant of
5 training, preparation, planning.

6 Every critical incident in this country that
7 would happen, within a day or two, myself and four or
8 five or six other upper-command staff would sit in the
9 office and we would read and talk about lessons
10 learned from that. Now, they haven't even done action
11 plans yet, but we were talking about the Pulse
12 Nightclub the next day and what are the take-aways,
13 what could we learn initially. We certainly have
14 ability to talk to men and woman in the profession and
15 learn these things. So training and preparing for the
16 next attack, because, sadly, as I sit here and testify
17 today, somewhere in this country, there's going to be
18 another active killing. It's not a matter of if, it's
19 a matter of when. And that's why we have to be
20 vigilant, vigilant. And that was kind of the -- the
21 underlying tone of our administration, be vigilant.
22 We know we can't prevent a crazed individual from
23 doing what he or she is going to do, but perhaps if we
24 plan our response better and we learn, we can save
25 people's lives, we can get there quicker, we can get

FOR THE RECORD REPORTING TALLAHASSEE FLORIDA 850.222.5491

1 and that's why to be accused of not training right and
2 not training rigorously and not being vigilant, it's
3 not accurate, sir.

4 Q. Did you, in addition to what you've explained
5 with your command staff, post some notorious event,
6 also see what was going on in the law enforcement
7 community as a result of those things by communication
8 with others in other agencies?

9 A. Always.

10 Q. So, for example, you mentioned the -- the
11 sit-down discussion, the analysis, after Pulse?

12 A. Yes.

13 Q. Did you learn that FBI and other sheriffs'
14 offices and other law enforcement agencies around the
15 country were essentially doing the same thing?

16 A. Yes.

17 Q. And is it ordinary as a part of your job as
18 sheriff to get a feel, get a sense, get an
19 understanding what thoughts and developments have the
20 larger law enforcement group figured out from this?

21 A. Yes.

22 Q. One of the previous witnesses mentioned that
23 after Fort Lauderdale airport -- Fort
24 Lauderdale-Hollywood shooting, BSO was asked to make a
25 presentation before some fairly significant national

FOR THE RECORD REPORTING TALLAHASSEE FLORIDA 850.222.5491

1 groups. Do you remember that testimony?

324

2 A. I do.

3 Q. Did you participate in any presentations to
4 law enforcement organizations post Fort
5 Lauderdale-Hollywood Airport shooting?

6 A. I did. Myself and Colonel Jack Dale were
7 invited to the Major County Sheriffs' Association,
8 they have a conference the first week, and then the
9 National Sheriffs' Association, their conference
10 begins when the other one concludes in the same venue.
11 It was in Reno. And Colonel Jack Dale and I went out
12 to that conference post airport, and not only we were
13 students at the -- or members of the conference, but
14 we taught a -- I think a 90-minute block on what
15 happened at the airport, lessons learned, because most
16 major county sheriffs or national sheriffs are going
17 to have some airport in their jurisdiction. So it was
18 very applicable and it was very important that we
19 share that information.

20 Q. And in the process of that presentation and
21 that series of meetings, did you have give-and-takes
22 so you got questions from the participants,
23 suggestions, in essentially being a learning
24 experience for BSO, as well as for everybody else?

25 A. If you've ever been into these conferences,

FOR THE RECORD REPORTING TALLAHASSEE FLORIDA 850.222.5491

1 that was important for everybody to hear?

326

2 A. Absolutely.

3 Q. That the thought of how you go about shutting
4 down an airport was really not within then law
5 enforcement experience?

6 A. Correct.

7 Q. But yet you would work through that with the
8 FBI during the Fort Lauderdale-Hollywood Airport
9 incident?

10 A. That was less of a problem or an issue with
11 the FBI. In fact, it wasn't even an issue with the
12 FBI. That was more with the Broward County Airport
13 Division, and we worked through it in a very positive
14 manner, exchanging information --

15 Q. You and the FBI and BCAD --

16 A. Yes.

17 Q. -- worked through the issues?

18 A. Yes.

19 Q. Now, you mentioned that the first draft gets
20 reviewed and that was the normal course of how these
21 things are done?

22 A. Yes.

23 Q. And Captain Diefenbacher was assigned to do
24 the next series of reviews?

25 A. Yes.

FOR THE RECORD REPORTING TALLAHASSEE FLORIDA 850.222.5491

1 there were quite a bit of questions. There was a lot
2 of dialog back and forth.

325

3 Q. Did anybody in those series of meetings when
4 you're making the presentation, suggest to you that
5 when there is an airport shooting, the immediate
6 response is to shut down the entire airport, no ifs,
7 ands or buts?

8 A. A lot of people think like that.

9 Q. And did you have some discussion there about
10 the practical realities of doing such a thing?

11 A. We did. And at that time, I knew how an
12 airport needs to get shut down and the protocols to
13 go -- you know, to go through it, but I -- my main
14 message was although no sheriff, to my knowledge, in
15 the country has the power to shut down an airport, we
16 can certainly be, you know, aggressive in a very
17 positive manner, letting the airport folks and the
18 folks nationally know that it's a safety issue and the
19 airport needs to be shut down until we say it's an all
20 clear, no fire in the hole, and we feel people can
21 move about safely.

22 Q. And is that a lesson learned from Fort
23 Lauderdale airport shooting?

24 A. Absolutely.

25 Q. And did it appear to you that it was a lesson

FOR THE RECORD REPORTING TALLAHASSEE FLORIDA 850.222.5491

1 Q. Did you assign him to that task?

327

2 A. I did not.

3 Q. Now, he's -- was a captain in the BSO when
4 you were the sheriff?

5 A. Yes.

6 Q. And he remains a captain in the BSO post
7 Sheriff Israel?

8 A. Yes. And I don't know if this was brought
9 out yesterday, but what was so important, the
10 undersheriff told me later to having Diefenbacher run
11 the next step was that he was also an attorney besides
12 being an accomplished police leader.

13 Q. And did you give direction to Captain
14 Diefenbacher what to do or how to do it?

15 A. Not at all.

16 Q. And Captain Diefenbacher goes through his
17 review process and rewriting. Was it your
18 understanding that once Captain Diefenbacher finished,
19 that's it, we have a final report?

20 A. No, sir.

21 Q. Is that how those things work?

22 A. No, sir.

23 Q. This final report, the offense incident
24 report, came out in I think November of 2017, October
25 or November 2017. So airport incident shooting,

FOR THE RECORD REPORTING TALLAHASSEE FLORIDA 850.222.5491

1 January to say November, a 10-month period. For an 328
2 event of that magnitude, is that a reasonable amount
3 of time to do a complete offense incident report?
4 A. Quite reasonable.
5 Q. And when Captain Diefenbacher did his
6 processing, did you understand that it included an
7 evaluation of subject matter experts getting input
8 from different agencies, et cetera?
9 A. Well, I would have assumed that because I
10 know the kind of work that Captain Diefenbacher
11 produces, but I never had a conversation with him or I
12 was never apprised he was doing that.
13 Q. And you didn't look at his draft report?
14 A. No, I did not.
15 Q. And are you familiar with how many more
16 versions, edits, red lines, strike-outs, reviews
17 happened before it got to the critical incident
18 report, the final report?
19 A. I actually have no idea.
20 Q. And we looked at it yesterday, but just so
21 it's clear, the final report is Governor Exhibit 6,
22 and that's dated October 6, 2017?
23 SPECIAL MASTER: Sheriff, please say "yes" or
24 "no." The court reporter has a hard time with
25 nods.

FOR THE RECORD REPORTING TALLAHASSEE FLORIDA 850.222.5491

1 Q. Did the critical incident report emphasize 330
2 the importance of effective trainings?
3 A. Yes.
4 Q. And is that something that was encouraged
5 when presentations were made to other organizations?
6 A. Yes.
7 Q. Now, the governor's memorandum adds as
8 additional reason for your suspension for neglect of
9 duty and incompetence, this, and this is on page 7,
10 they say, "The report" -- referring to the final
11 report -- "never acknowledges failures on the part of
12 Israel or BSO. Rather, as highlighted above, the
13 final report claims you cannot prevent or prepare for
14 this type of event, and that through the leadership of
15 Sheriff Israel, the event was mitigated and the scene
16 was secured and handled."
17 You remember that part of the governor's
18 memorandum?
19 A. Oh, very well.
20 Q. Now, isn't it accurate to say that the
21 governor's memorandum truncates and selectively
22 identifies portions of the report and takes them out
23 of context?
24 A. Yeah. We used the word "cherry-pick" when we
25 spoke.

FOR THE RECORD REPORTING TALLAHASSEE FLORIDA 850.222.5491

1 THE WITNESS: Yes. 329
2 SPECIAL MASTER: Thank you.
3 BY MR. KUEHNE:
4 Q. Did the critical incident report, the final
5 incident report, become part of the materials that you
6 and BSO used when you made presentations on the Fort
7 Lauderdale-Hollywood incident?
8 A. Yes.
9 Q. And was it widely distributed?
10 A. Yes.
11 Q. Did you get any push-back from national law
12 enforcement circles that the critical incident report
13 wasn't complete, wasn't the right form, didn't have
14 enough criticisms in it?
15 A. Just the opposite. I know the undersheriff
16 had gone to at least three or four venues throughout
17 the country, and I might have had other colonels, I
18 can't specifically say, that went to locations. I
19 believe the undersheriff was actually invited to
20 Montreal as one of his stops to do a presentation of
21 what happened at the airport. And after one of the
22 presentations, I would get calls from the folks that
23 hosted the conference, thanking them for allowing
24 staff to go up there and make such a professional and
25 worthwhile presentation.

FOR THE RECORD REPORTING TALLAHASSEE FLORIDA 850.222.5491

1 Q. Doesn't the report actually say -- and I'm 331
2 quoting -- "Through the leadership of Sheriff Israel,
3 BSO personnel, the FBI, BCAD, and other law
4 enforcement agencies, fire rescue, regional
5 communications, and community partners, this tragic
6 event was mitigated and investigated in an
7 extraordinary manner"?
8 A. That's exactly what it said, and that's why I
9 just -- you know, I realize I stay in my lane and I'm
10 only the sheriff of one of many counties in the state,
11 and the power of a governor far surpasses that of a
12 sheriff, but that is the reason I just shake my head
13 that how could I not be called to a conference with
14 the governor to explain these things to him. Governor
15 Scott and I sat in an office and we went over as much
16 detail as we could of what happened. But to be
17 suspended and be called incompetent and not even have
18 the chance to explain what actually happened. I was
19 there. I left -- I was running an obstacle course in
20 the park that day, it was my day off, and I went to
21 the airport. I got there about an hour and a half
22 later and stayed for maybe 12 hours. I just wanted to
23 share what my observations were, what I did.
24 Q. The -- I mentioned when I was reading the
25 governor's memorandum it says -- and the memorandum

FOR THE RECORD REPORTING TALLAHASSEE FLORIDA 850.222.5491

1 says, "The final report claims you cannot prevent or 332
2 prepare for this type of event." Doesn't the report
3 itself say the following: Not you cannot prepare for
4 this type of event, but doesn't the report actually
5 say, "there is no way to prevent this tragedy or to
6 prepare completely for the amount of unique obstacles
7 that had to be overcome in a very short period of
8 time"?
9 A. That's --
10 Q. Isn't that what the report says?
11 A. That's exactly what it --
12 Q. And is that an accurate observation in the
13 report?
14 A. Yes, it is.
15 Q. Did you say, as the governor claims, you
16 cannot prevent or prepare for this type of event?
17 A. That was never said. It's an absolute false
18 statement.
19 Q. In fact, doesn't the report conclude that you
20 can prepare for it, you just can't prepare completely
21 for the amount of unique obstacles that had to be
22 overcome in a very short period of time?
23 A. Yes, and we had that conversation, and what
24 the undersheriff was saying in that report is even in
25 training, at the airport we found that day there were

FOR THE RECORD REPORTING TALLAHASSEE FLORIDA 850.222.5491

1 A. That's correct. 334
2 Q. And the agreement specified that a school
3 resource officer would be assigned to that school?
4 A. Yes.
5 Q. And then the agreement had other schools
6 assigned an officer?
7 A. Yes.
8 Q. The officer assigned was former Deputy Scot
9 Peterson?
10 A. Yes.
11 Q. Did you have any role in his assignment to
12 that location?
13 A. No.
14 Q. Did the Broward County Schools have input
15 into evaluating what they thought of their SRO
16 assigned to the schools?
17 A. Yes.
18 Q. And had SRO Peterson been at Marjory Stoneman
19 Douglas for some period of time before that mass
20 tragedy?
21 A. Quite some time.
22 Q. And he had been an SRO for a lot of years?
23 A. He had been an SRO for a lot of years, he was
24 considered a very good SRO, and I think he was --
25 might have been selected as SRO of the year, and he

FOR THE RECORD REPORTING TALLAHASSEE FLORIDA 850.222.5491

1 approximately -- the airport aviation division said 333
2 there were approximately twenty to twenty-two thousand
3 people that were either on planes, in turnstiles, or
4 somewhere within the proximity of that airport.
5 There's really no way to re-create training and
6 experience 20,000 people running haphazardly. That's
7 what they were trying to say, that you can't
8 completely prepare for that type of event, but you can
9 plan, you can prepare, and we did.
10 Q. Did BSO as part of its pre-Fort
11 Lauderdale-Hollywood training and its post Fort
12 Lauderdale training try to prepare officers to prepare
13 for the unexpected?
14 A. Yes, we did.
15 Q. Is that an important part of law enforcing?
16 A. One of the most fundamental parts of law
17 enforcement.
18 Q. The Marjory Stoneman Douglas tragedy happened
19 February 14, 2018?
20 A. Yes.
21 Q. BSO had an agreement with Broward County
22 Schools to staff a certain number of schools with an
23 SRO, school resource officer?
24 A. That's correct.
25 Q. Marjory Stoneman Douglas was one of them?

FOR THE RECORD REPORTING TALLAHASSEE FLORIDA 850.222.5491

1 actually taught some of the courses on how a school 335
2 resource officer should react to an active killer
3 situation.
4 Q. You're aware that he did, in fact, teach
5 Broward County personnel in how to respond to an
6 active shooter situation?
7 A. I do know that.
8 Q. Now, as you understand, you understand some
9 of what goes into training non-law enforcement into
10 responding to an active shooter situation?
11 A. I do.
12 Q. That's different from the active shooter
13 policy, 4.37, of Broward Sheriff's Office?
14 A. Yes. The fundamental premise of the training
15 is completely different.
16 Q. But SRO Peterson was nonetheless a trainer
17 for Broward schools personnel?
18 A. Absolutely.
19 Q. And you understand that -- now that SRO
20 Peterson actually met with and worked with people at
21 that school, at Marjory Stoneman Douglas, at the
22 beginning of the school year and other times during
23 the school year to essentially practice or get ready
24 or be aware of?
25 A. I do know that now.

FOR THE RECORD REPORTING TALLAHASSEE FLORIDA 850.222.5491

1 Q. And that one of the responsibilities of SROs,³³⁶
2 as you understand it, is as events unfold, if there's
3 something that needs to be imparted to school
4 administration, the SRO has the ability to do that?

5 A. He does.

6 Q. And BSO on its own, not through the SROs,
7 regularly communicates threats, issues of concern,
8 other incidents to the school system?

9 A. That's correct.

10 Q. And that's done as a matter of conserving the
11 peace in Broward County?

12 A. Exactly.

13 Q. And is there -- let me ask you this: You
14 became -- you were elected sheriff in November of
15 2012?

16 A. Yes.

17 Q. And then became sheriff. You were sworn in
18 in early 2013?

19 A. January.

20 Q. January 2013.

21 During -- what was one of the first projects
22 you instituted upon becoming sheriff in January of
23 2013?

24 A. I think when I -- the first SWAT commander
25 that I -- well, first individual I made SWAT commander

FOR THE RECORD REPORTING TALLAHASSEE FLORIDA 850.222.5491

1 when I came over was Lieutenant Colonel Michael
2 DiMaggio. Mike is a consummate professional, lives,
3 eats and breathes SWAT, and the first meeting I had
4 with Mike, I told him I wanted a full-scale school
5 active shooter scenario. I told him it was a
6 priority. I told him it wasn't going to be able to be
7 done with it within a week or a month because of all
8 the work that was going to go into it. And then I
9 believe a few months later at Pompano Beach High
10 School in Broward County, we had one of the most
11 comprehensive full-scale trainings I've ever been a
12 part of. We actually had helicopters allow SWAT team
13 members to repel into the school to -- if students
14 were shot and injured in upper classrooms, so they
15 entered in through upper classrooms. In the scenario,
16 there was an active killer, still uncaptured. And
17 we -- incredible training. We repelled a K-9 dog down
18 off the helicopter into those upper classrooms so that
19 the K-9 dog could search out the killer. There were
20 so -- we had fire -- Pompano Beach has their own fire
21 department. We just do police. So Pompano fire was
22 there. They did an incredible job. And so many
23 different units and components came together. It was
24 a complete day-long training, and I want to say there
25 were about 200 to 300 students who volunteered their

FOR THE RECORD REPORTING TALLAHASSEE FLORIDA 850.222.5491

1 times to be victims, observers, students.³³⁸

2 Q. I want you to take a look at Israel Exhibit
3 29, and that's Israel Bates No. 2139. Is this an
4 accurate article in a police newsletter about the
5 Pompano Beach High School active shooter training?

6 A. It is.

7 Q. You've read it before?

8 A. I have.

9 Q. And does it explain the complexity and
10 involvement of so many different people, including
11 Broward County Schools?

12 A. It does.

13 Q. Is that an easy exercise to organize?

14 A. It's probably one of the more complex
15 trainings to organize that you will have.

16 Q. DiMaggio was your SWAT captain -- was he a
17 major?

18 A. Major.

19 Q. Major DiMaggio was your SWAT captain, and he
20 was overall in charge of this?

21 A. He was overall in charge of this with -- the
22 SWAT captain was Captain Ed Grant.

23 Q. Were you called upon in your position as
24 sheriff to pick up the phone, make a request, to use
25 your official status to get the school board to help

FOR THE RECORD REPORTING TALLAHASSEE FLORIDA 850.222.5491

1 you accomplish this?

2 A. Yes. I actually had direct calls with the
3 school superintendent, Robert Runcie, who was very
4 cooperative and very willing to work with me on this
5 endeavor.

6 Q. Nothing like this had ever before been done
7 in Broward County, had it?

8 A. Not to my knowledge.

9 Q. Are you aware of anything like this having
10 been done in South Florida?

11 A. I'm not.

12 Q. Did this real-life, large-scale, active
13 shooter at a school scenario become looked at by other
14 law enforcement officers around the country?

15 A. I got quite a few calls on the training.

16 Q. Did you send other law enforcement officers
17 and offices around the country the material and the
18 backup to help them develop such a preparation?

19 A. I believe Lieutenant Colonel DiMaggio did
20 just that.

21 Q. Was it your understanding that law
22 enforcement around the country was actually surprised
23 that such a full-scale scenario could be -- could be
24 implemented?

25 A. Yeah, I remember one time Lieutenant Colonel

FOR THE RECORD REPORTING TALLAHASSEE FLORIDA 850.222.5491

1 DiMaggio coming into my office and saying -- I said, 340
2 "How's it going with the -- with, you know, our
3 brothers and sisters in law enforcement?" He goes,
4 "The one question I get asked, Sheriff, is how did you
5 guys pull that off?" So it was appreciated. I think
6 law enforcement around the country appreciated the
7 efforts that we had to go through to even bring this
8 training to Pompano.
9 Q. And how about within BSO? Did having this
10 full-scale active shooter scenario in a school help
11 emphasize the importance of protection of our very
12 vulnerable child population?
13 A. Yes, and I think, you know, through -- the
14 men and women in the agency have heard me campaign,
15 they know that -- with all the hats I wear, they know
16 that the most important hat I wear is that of dad. I
17 have triplets, two boys and a girl. I coach the boys
18 throughout every sport they play, coached other kids
19 in the community, coached at two different high
20 schools, and just my whole essence of becoming sheriff
21 was to make Broward County a better place for kids.
22 So I think that sent the message. They knew that
23 already, and then when they saw the first mass
24 training we're doing is at a high school, I think I
25 set -- I think it set the tone for the agency that the

FOR THE RECORD REPORTING TALLAHASSEE FLORIDA 850.222.5491

1 Q. Is the BSO philosophy of selecting the 342
2 appropriate candidate to look for experienced
3 deputies?
4 A. It's to look for putting a round plug in a
5 round hole. I tell the folks that select their units:
6 Don't have any preconceived notions, don't have
7 anybody first on the list or last on the list, let the
8 folks come in, let them interview fairly, and just
9 because a person might have come in fifth when they
10 put in for a burglary job doesn't mean they won't be
11 first for an SRO job. So I said be open-minded, know
12 what dimensions and disciplines you're looking for,
13 and pick the person that is most likely going to give
14 you what you're looking for and be able to serve the
15 public and make that presentation.
16 Q. As you understand it, as part of the SRO
17 overall responsibility, did the SROs work with the
18 schools' personnel to essentially inventory the
19 schools, get a sense of what the physical plant is?
20 A. Yes.
21 Q. Offer suggestions on safety and security?
22 A. Yes.
23 Q. Who ultimately, though, was responsible for
24 the operation of the physical plant?
25 A. Of the school?

FOR THE RECORD REPORTING TALLAHASSEE FLORIDA 850.222.5491

1 safety of children is going to be preeminent 341
2 responsibility for us during Sheriff Israel's
3 administration.
4 Q. Since that time, since that active shooter
5 training, did you detect any complacency or
6 laissez-faire attitude among any deputies when it came
7 to situations like school incidents?
8 A. I've never witnessed it, no.
9 Q. Did you sense any complacency among SROs that
10 they're just there to be glorified security guards, no
11 big deal?
12 A. Just the opposite. I went to countless
13 schools, and our SROs were -- they were exuberant,
14 they were excited to be there, and the reason I know
15 they enjoyed being there is because the principals of
16 those schools, when I do these walk-throughs and stop
17 to do readings with kids or stuff like that, the
18 principals were complimentary of the men and women
19 that we had assigned to the school. So I know that
20 our leaders selected the right people to be in our
21 elementary and middle and high schools.
22 Q. When it came to the SRO selection at BSO,
23 somebody has to apply or invite themselves to be an
24 SRO candidate?
25 A. Correct.

FOR THE RECORD REPORTING TALLAHASSEE FLORIDA 850.222.5491

1 Q. Of the school. 343
2 A. Superintendent.
3 Q. So the -- the governor criticizes you and BSO
4 that at Marjory Stoneman Douglas High School the day
5 of the incident, there were several entryways into the
6 school. Do you remember that criticism?
7 A. I do.
8 Q. Is there some uniform law passed by the State
9 of Florida that requires at high schools, a single
10 entrance that you know of?
11 A. No, not that I know of.
12 Q. Is there any Broward County ordinance or
13 school board policy that you know that says all high
14 schools have to have one in, one out?
15 A. No.
16 Q. Has the BSO encouraged the Broward County
17 Schools to limit access in and out of schools --
18 A. Yes.
19 Q. -- all schools?
20 A. Yes.
21 Q. And do you understand that to be a dialog,
22 BSO is looking for safety first, but the school system
23 has a lot of factors that it has to put in?
24 A. Yes. One particular example, we heard a
25 witness testify yesterday that when school personnel

FOR THE RECORD REPORTING TALLAHASSEE FLORIDA 850.222.5491

were feverishly trying to track the killer's movements, they rewound the camera a certain way, and when they were giving out what they thought was real-time intelligence to police, it was actually about 20 minutes behind. So I knew that was something that needed to be fixed, and for almost a year I had conversations, fervent conversations, with the school superintendent, and our staff had conversations with his staff, and I wanted to make sure that if a critical incident occurred, we as police could take over without asking anyone for permission, complete autonomy of the cameras that existed in schools throughout Broward County. There was no time to call up and ask for permission or get a phone call. We just want to be able to flick a switch. And the school board, I understand that they had legal issues and their attorneys were worried and concerned about some things regarding the rights of privacy and the rights of students, and we had these discussions, and shortly before the governor suspended me, we signed a memo of understanding that at the time I left office, we had access to cameras immediately, and that was something very -- very important and something that we worked feverishly on.

Q. Take a look at Exhibit 24, which starts at

FOR THE RECORD REPORTING TALLAHASSEE FLORIDA 850.222.5491

when I feel I need to be involved, I get involved.

Q. The governor's memorandum also criticizes you, the BSO, that the SRO at Marjory Stoneman Douglas was not actually carrying his rifle at the time he was acting as SRO and had to go get the rifle. Do I understand that?

A. Yes.

Q. Is that a fair criticism?

A. Of me?

Q. Of the process.

A. No.

Q. Have you had discussions at your level where the Broward County Schools' response to you is effectively our schools not armed camps?

A. Yes.

Q. We don't want to have a military operation daily at our schools?

A. Yes.

Q. We want to encourage schools and children to have a healthy respect for police?

A. Yes.

Q. And we want our SROs to be the kind of SROs who essentially can help our kids feel good about law enforcement?

A. Yes.

FOR THE RECORD REPORTING TALLAHASSEE FLORIDA 850.222.5491

Israel 1923. It's actually two documents in one. One document is dated January 8, 2019. That's the first document. And the second document is February 19, 2019. So during your tenure and after your tenure.

A. Okay.

Q. Is this apropos of the negotiation leading to improvements in camera access from the Broward County School Board to the BSO?

A. Yes.

Q. Did you get involved at that high level of discussions, or was this done at levels below you?

A. I got involved.

Q. Do you get involved in all discussions and negotiations with the school board and other governmental entities?

A. Not at all.

Q. How do you decide when to get involved and not?

A. Based on the nature of importance and based on what -- when I think it's time for me to get involved. You don't want to -- from a leadership perspective, you don't want to pull things away from, you know, the men and women you work with when they're working on something and they're working to accomplish something. But I know when I need to be involved, and

FOR THE RECORD REPORTING TALLAHASSEE FLORIDA 850.222.5491

Q. And do those goals sometimes conflict a little bit with a law enforcement goal of we want to make sure we can do everything to limit the ability of things to happen?

A. Of course, they conflict. One school -- I don't know if it was a teacher or principal, but one school person once told me about their SRO, that I want the SRO to be a combination -- what makes him or her so good is they're a combination of Santa Claus and the Easter bunny. And, you know, you like to hear things like that, but sometimes when a person has the personality to be Santa Claus and the Easter bunny, they're not going to turn in to be a Navy SEAL. It doesn't -- you know, people have different personalities, different skill sets, but yes to your question.

Q. So when you hear a principal saying "Easter bunny, Santa Claus," is the BSO response "Yes, but he's a deputy"?

A. Yes.

Q. So is that -- do you trade off the friendly Easter bunny/Santa Claus in lieu of being a law enforcement officer?

A. No, there's no trade-off. You bring over highly-trained school resource deputies that are

FOR THE RECORD REPORTING TALLAHASSEE FLORIDA 850.222.5491

1 qualified, that want to be there, that the schools 348
2 want them there, and you give them the training
3 that -- you know, that as a sheriff, I'm obligated to
4 give them, you provide them with the policies and
5 procedures. But no matter what, the governor's
6 attorney says at any time. If they think I can
7 provide any woman or man on this earth with courage
8 and the desire to go inside when their conscience is
9 telling them I'm not going in there, there's no
10 sheriff, there's no police leader, there's no football
11 coach or there's no general that's going to get
12 someone to go in when the human element takes over and
13 they say to themselves "I'm not going in."
14 Q. Did you have any reason to believe on
15 February 14, 2018, that then SRO Peterson would not
16 immediately or promptly go in?
17 A. Had I had that knowledge, I would have
18 removed him as a deputy.
19 Q. Did you have any knowledge?
20 A. No, sir, not at all.
21 Q. Have you since looked at his personnel file
22 to see if there's anything that indicates an unfitness
23 for service or lack of knowledge of the training?
24 A. I have. It has been shown to me, yes, and --
25 Q. Is there anything like that?

FOR THE RECORD REPORTING TALLAHASSEE FLORIDA 850.222.5491

1 Q. I'm going to hand you Exhibit 31. Let me 350
2 just find the right page. Israel Exhibit 31, starting
3 at page Israel 2849.
4 A. I'm familiar with it.
5 Q. That's a January 2018 -- January 2018 seminar
6 at the Broward County Schools, correct?
7 A. Yes.
8 Q. And that deals with their special
9 investigations law enforcement function?
10 A. Yes.
11 Q. Did BSO assist in preparation for that
12 seminar?
13 A. Yes.
14 Q. Did BSO provide personnel for presentation at
15 the seminar?
16 A. Yes.
17 Q. Did BSO discuss with Broward County Schools
18 at that seminar, security issues, including security
19 policies?
20 A. Yes.
21 Q. And is that a regular occurrence?
22 A. Yes.
23 Q. Now, that was, sadly, a month before the
24 Marjory Stoneman Douglas massacre?
25 A. Yes.

FOR THE RECORD REPORTING TALLAHASSEE FLORIDA 850.222.5491

1 A. Absolutely not. 349
2 Q. But does his report reflect significant
3 active shooter course participation?
4 A. Yes.
5 Q. Now, BSO, in addition to the contract with
6 the school system to provide SROs, also helps the
7 school system with issues of law enforcement, safety,
8 security, including planning?
9 A. That's correct.
10 Q. And there's a part of the Broward County
11 Schools that's their law enforcement unit called
12 special investigative unit?
13 A. Yes.
14 Q. You're familiar with that. That's like their
15 police department, but it doesn't do a full policing
16 job, like, for example, the Dade County School Board
17 has their own police force that actually polices their
18 schools?
19 A. You're talking about one agency that has
20 thousand employees and one that just has maybe 30 or
21 40.
22 Q. Okay. So does the BSO help facilitate
23 training programs for the Broward County Schools law
24 enforcement unit?
25 A. Yes.

FOR THE RECORD REPORTING TALLAHASSEE FLORIDA 850.222.5491

1 Q. Was there any part of that training, that 351
2 seminar, that report, that in any way led to a lax of
3 security at any of the schools, including Marjory
4 Stoneman Douglas?
5 A. No.
6 Q. Was it instead part of the effort of
7 coordination between BSO and Broward schools to
8 enhance safety of the children in the schools?
9 A. Certainly.
10 Q. Did anybody at that seminar clamor, demand
11 that BSO conduct another full-scale at a school, high
12 school or any school, active shooter/killer scenario?
13 A. I wasn't at the seminar, but when Colonel
14 Polan briefed me on it, he never mentioned anything
15 like that being brought up.
16 Q. And Colonel Polan is one of the command
17 officers?
18 A. Yes, he is. He was in charge of the
19 Department of Law Enforcement.
20 Q. But didn't he discuss with you that some of
21 the people remembered and were aware of that
22 large-scale active shooter scenario?
23 A. He certainly did.
24 Q. That from 2013 to 2018, it was still fresh in
25 some people's minds, as far as Colonel Polan had

FOR THE RECORD REPORTING TALLAHASSEE FLORIDA 850.222.5491

1 explained to you given the dialog and discussion? 352
2 A. Correct.
3 Q. We've heard much testimony that the response
4 of SRO Peterson was a failure, correct?
5 A. Correct.
6 Q. Do you agree?
7 A. Yes.
8 Q. And was it immediately evident, immediately
9 in the aftermath, that Deputy Peterson had so failed
10 to discharge his responsibilities?
11 A. Absolutely not.
12 Q. It took some time?
13 A. Yes.
14 Q. And you're aware that Deputy Peterson in his
15 SRO capacity did call for a code red at the school?
16 A. Yes.
17 Q. Now, that's -- means something, right?
18 A. To the school.
19 Q. To the school. It's a system in the school
20 that a code red essentially shuts down the school
21 in -- not preparation for, but in response to a likely
22 major incident?
23 A. Correct.
24 Q. And that establishment of a code red for the
25 school and the implementation is something that was

FOR THE RECORD REPORTING TALLAHASSEE FLORIDA 850.222.5491

1 for policy review and evaluation? 354
2 A. Yes, we did.
3 Q. Did it include involvement by Executive
4 Director Pusins?
5 A. Yes.
6 Q. And is that because of his national expertise
7 in police practices and policies?
8 A. Clearly.
9 Q. Did it include not just high-level rank
10 officers, but also -- I'll call them on the ground --
11 boots on the ground officers?
12 A. Yes. One of the things that Colonel Polan
13 and I used to talk about all the time is when
14 developing policies, make sure we're not only having
15 discussions with command staff, but the ultimate boots
16 on the ground, the user of those policies. I'm a
17 user-friendly sheriff. I wanted input from the folks
18 that are going to actually carry out through those
19 policies and hear what they have to say. So they were
20 always used in the development of those policies.
21 Q. Did the development of that policy include
22 reviewing the literature out there, meaning in law
23 enforcement circles, on such policies?
24 A. From my perspective, it did because I would
25 always read policies, as did most of the -- if not all

FOR THE RECORD REPORTING TALLAHASSEE FLORIDA 850.222.5491

1 worked through between BSO and Broward County 353
2 Schools --
3 A. Correct.
4 Q. -- to develop that process?
5 A. Yes.
6 Q. And that code red process was initiated by
7 SRO Peterson?
8 A. Yes.
9 Q. He, however, didn't follow the training, the
10 policy of 4.37, active shooter?
11 A. He did not.
12 Q. Now, that policy -- and we've heard lots of
13 discussions about it. That policy, you're familiar
14 with, but I'll give you a copy of it. Exhibit 1,
15 Bates Israel 1.
16 You had involvement in the development of
17 that policy?
18 A. I did.
19 Q. Generally explain how that policy -- strike
20 that.
21 Was the review and development of that policy
22 into that version of 4.37 part of a regular policy
23 review process?
24 A. Yes.
25 Q. Did you have at BSO an established process

FOR THE RECORD REPORTING TALLAHASSEE FLORIDA 850.222.5491

1 of the command staff. 355
2 Q. And was that the process used?
3 A. Yes.
4 Q. Did -- you knew at the time that the State of
5 Florida, FDLE, and the Justice Training Standards
6 Commission had no requirement for an active shooter
7 policy?
8 A. I did know that.
9 Q. And did you know at the time that some
10 sheriffs' offices didn't have any policy whatsoever?
11 A. No, I did not know that.
12 Q. You've since learned that?
13 A. Yes.
14 Q. And did you understand that policies in
15 Florida were looked at to try to compare and contrast?
16 A. I actually looked at some.
17 Q. In addition to you, did the team look at
18 others?
19 A. Yes.
20 Q. And was the development of that policy in the
21 language used consistent with model policies?
22 A. Yes.
23 Q. Consistent with standard practices in law
24 enforcement?
25 A. Yes.

FOR THE RECORD REPORTING TALLAHASSEE FLORIDA 850.222.5491

1 Q. Inconsistent in any way with desirable or 356
2 desired active shooter policies?
3 A. It was completely in line with desired active
4 shooter policies.
5 Q. It was in place, revised in 2016?
6 A. It was.
7 Q. And from 2016 to February 14th of 2018, was
8 there any criticism about that policy?
9 A. None at all.
10 Q. Within law enforcement circles?
11 A. No.
12 Q. How about outside law enforcement circles,
13 like among politicians?
14 A. No, nobody criticized it. Matter of fact,
15 the policy -- as a reader, when I had input in that
16 final policy in 2016, I read many of the policies --
17 many of the policies in Florida and throughout the
18 country, and I didn't reinvent the wheel, I didn't
19 create my own policy, I didn't author some -- you
20 know, have some magic mantra and author some policy.
21 I read quite a few policies, and then we worked to
22 tailor our policy to what we thought was a compilation
23 of getting the best policy we could that sent the
24 message to our deputies how we wanted them to respond
25 and how we expected them to perform.

FOR THE RECORD REPORTING TALLAHASSEE FLORIDA 850.222.5491

1 A. Absolutely not. 358
2 Q. What do you understand the training -- strike
3 that.
4 You were not a trainer?
5 A. No.
6 Q. Did you go to trainings?
7 A. I did.
8 Q. Did you go to active shooter trainings?
9 A. I would go into different ones at different
10 times. I've went to quite a few, not for the whole
11 day, but different trainings for different segments.
12 Q. And is that part of your role as sheriff, to
13 be visible among the line troops?
14 A. Absolutely.
15 Q. To know what's going on?
16 A. Absolutely.
17 Q. Not just sit in an office and get a report
18 going up?
19 A. No.
20 Q. You were sheriff, would you go on occasion
21 with road patrol to see what they're doing?
22 A. I would go -- I wouldn't go in the car with
23 another deputy, but I rode with a deputy constantly,
24 Deputy Conroy, and if an officer needed backup or we
25 needed to do a traffic stop, we would do -- or help

FOR THE RECORD REPORTING TALLAHASSEE FLORIDA 850.222.5491

1 Q. And what -- when that policy was up to final 357
2 approval, did you give final approval?
3 A. I did.
4 Q. Was the general counsel for the Broward
5 Sheriff's Office a participant in discussions
6 regarding the formulation of that policy?
7 A. He was.
8 Q. And that was Ron Gunzburger?
9 A. Yes.
10 Q. Did he have extensive experience in legal
11 matters involving law enforcement?
12 A. Yes.
13 Q. He had been general counsel for quite some
14 time?
15 A. Six years.
16 Q. So the policy gets approved, and now we know
17 post Marjory Stoneman Douglas tragedy that the "may"
18 word has been singled out and criticized and used by
19 the governor as a reason to say you neglected your
20 duties and were incompetent. You understand that?
21 A. Yes.
22 Q. Is there any part of that policy that led to
23 or caused deputies, as you understand the training, to
24 hesitate, to take no action in the face of an active
25 shooter?

FOR THE RECORD REPORTING TALLAHASSEE FLORIDA 850.222.5491

1 out in any way. Not only BSO, but if we could back up 359
2 a Florida highway trooper on the road or back up a
3 police officer in another city in Broward County,
4 they -- you know, sheriff's here to back me up, you
5 know. So we were cops.
6 Q. As a career law enforcement officer, boots on
7 the ground never leaves you?
8 A. Never leaves you.
9 Q. So -- by the way, were you aware of any
10 federal legislation by the Congress that required
11 active shooter training for large law enforcement
12 agencies?
13 A. I'm not aware of any, no.
14 Q. Were you aware of any proviso set by the
15 Congress that said if you're getting federal grant
16 money, you have to have active shooter training or
17 active shooter policies?
18 A. There was no industry standard for active
19 shooter training.
20 Q. And no congressional mandate?
21 A. No congressional mandate.
22 Q. Broward sheriff got federal funds --
23 A. Yes.
24 Q. -- or grants, right?
25 A. Yes.

FOR THE RECORD REPORTING TALLAHASSEE FLORIDA 850.222.5491

1 Q. And did Broward Sheriff's Office comply in 360
2 every respect with the requirements of those grants?
3 A. Yes.
4 Q. Now, you may not be aware of this, maybe you
5 are, but before the governor became governor, he was a
6 member of Congress, right?
7 A. Yes.
8 Q. Are you aware of anything that he did as a
9 member of Congress to require active shooter policies
10 to be implemented by law enforcement circles?
11 A. I'm not aware of anything, no.
12 Q. Nothing?
13 A. Nothing.
14 Q. What was your -- what is your understanding
15 of the training on the active shooter policy? What
16 are officers trained to do in pursuance of that active
17 shooter policy?
18 A. Well, I witnessed it, so I know what the
19 training was because I had influenced my will on the
20 training.
21 Special Master, you've heard a lot about
22 "may" and "shall," and you'll read it all yourself and
23 come to your own conclusions, but I tell you it's a
24 red herring. I've read hundreds of policies with
25 "may" and hundreds of policies with "shall," and they

FOR THE RECORD REPORTING TALLAHASSEE FLORIDA 850.222.5491

1 as soon as is humanly possible, with no exceptions 362
2 other than developing intell or witnessing or seeing
3 or hearing something that says it's life-threatening
4 for me to go in here this second. Not to enter into a
5 life-threatening situation, we must do that, but to
6 open this door like the hero in Thousand Oaks,
7 California, did a few months ago when that sergeant
8 was killed going through a door in an active shooter
9 situation. That's what may -- that's what I was
10 trying to prevent, that's what I am trying to prevent.
11 That's why we went with the policy, "may." It's a red
12 herring.
13 Q. Was it your demand in developing the 4.37
14 policy to make sure all of your people agreed that you
15 wanted "may" in there and it was going to go in there
16 whether it was consistent or inconsistent with
17 national standards?
18 A. No, it was -- first of all, I would never do
19 anything that was inconsistent with national
20 standards. It was quite consistent with national
21 standards. It was -- it's shared by hundreds and
22 hundreds of law enforcement agencies around the
23 country. And the command staff understood that, and
24 we -- as one. I take full responsibility for the
25 word, I take full responsibility for the institution

FOR THE RECORD REPORTING TALLAHASSEE FLORIDA 850.222.5491

1 say the same thing. 361
2 The purposes of the policy is to give the
3 officer discretion not to go into a suicide mission.
4 If your child was inside a school, you'd want an
5 officer to go in, but you want him to go in alive so
6 he can do what he was trained to do, and that's
7 eliminate the threat to the student, to the citizen.
8 And the policies you read, you'll read on
9 "shall." It says "shall," and then it says a comma,
10 "when reasonable information." Well, when I told my
11 kids you shall do something, I didn't give them a
12 caveat with a comma. I said "You shall be home by
13 11:00." Whenever there's that comma and there's that
14 caveat, "shall" and "may" are the same. All lawyers
15 in Broward County that have spoke to me say they're
16 exactly the same. It's a red herring.
17 Our training told our deputies you will go in
18 as soon as you possibly can through the closest
19 entrance. Barring a booby trap door or gunfire coming
20 through that doorway, you will go in, you will push,
21 you will engage, you will eliminate the threat,
22 whether it's through using lethal force, apprehending
23 the individual, surrender, having the individual flee.
24 But our training was specific, you will pursue, you
25 will enter, and you will take that person into custody

FOR THE RECORD REPORTING TALLAHASSEE FLORIDA 850.222.5491

1 of policy, but there was a lot of support. 363
2 Q. Now, the governor contends in his memorandum
3 to the Special Master that SOP 4.37 goes against
4 accepted practices. Do you remember that as part of
5 his argument?
6 A. I do.
7 Q. Is there any validity to that whatsoever?
8 A. No validity. It's a fictional statement.
9 Q. Does 4.37, as written in Exhibit 1 and as
10 trained, act entirely consistent with accepted
11 practices?
12 A. Absolutely does.
13 Q. Is it consistent with national standards?
14 A. It absolutely is.
15 Q. Is it consistent with what goes on in the
16 State of Florida?
17 A. It certainly is.
18 Q. Is it consistent with the policies of the law
19 enforcement agencies that are certified by the Florida
20 Department of Law Enforcement?
21 A. It surely is.
22 Q. The governor also contends in that same
23 argument that the policy is "wholly inadequate and
24 insufficient." Do you have a response for that?
25 A. As the kids text, SMH, shaking my head. If

FOR THE RECORD REPORTING TALLAHASSEE FLORIDA 850.222.5491

1 he only understood how many policies -- tried and 364
2 tested policies state just that, appropriately so.
3 Q. And you've mentioned that you were never
4 given an opportunity to explain any of that policy to
5 him?
6 A. Never.
7 Q. And since you've been suspended as sheriff,
8 have you kept up on FDLE standards, accessing the
9 website, seeing what they do and say?
10 A. I have not.
11 Q. Now, the governor, also in an effort to claim
12 neglect of duty and incompetence, asserts that two of
13 your deputies, Deputy Eason and Treijs, had
14 interactions with the shooter --
15 A. Uh-huh.
16 Q. -- and were later disciplined, and had those
17 interactions been done properly, the governor claims
18 the shooting would never have occurred. You
19 understand that argument --
20 A. Yeah.
21 Q. -- the sheriff makes?
22 Now, my question is meant respectfully
23 because many lives were lost that day.
24 A. Uh-huh.
25 Q. Lives for which -- do you grieve for those

FOR THE RECORD REPORTING TALLAHASSEE FLORIDA 850.222.5491

1 activity on the part of the shooter that would have 366
2 resulted in, under any scenario, his arrest --
3 apprehension and arrest?
4 A. Absolutely not.
5 Q. Do you -- you were not involved in the
6 discipline of those two officers, were you?
7 A. Well, to the point where I -- discipline, as
8 always, goes through me. The colonel will always
9 bring the final discipline to me.
10 Q. It ultimately goes to you --
11 A. Ultimately.
12 Q. -- but there's a process --
13 A. Yes.
14 Q. -- for determining discipline?
15 A. Yes.
16 Q. It's not Sheriff Israel snapped his fingers,
17 you're fired, you're demoted, you're this, you're
18 that?
19 A. No.
20 Q. And that process is, as far as you know,
21 always followed within the BSO?
22 A. Yeah, I mean, I completely respect it, honor
23 the law, and I honor the collective bargaining
24 agreements. So there are collective bargaining
25 agreements and the law and rights of those accused,

FOR THE RECORD REPORTING TALLAHASSEE FLORIDA 850.222.5491

1 lives? 365
2 A. Every day. A lot of people don't know this,
3 but our house that we used to live in for 20 years, we
4 raised our kids in, was between the two schools, West
5 Glades Middle School and Parkland. You can see
6 Stoneman Douglas from my back yard. My triplets went
7 to Stoneman Douglas. I'll never -- I wish I could see
8 -- it's indelible in my mind. I wish I could forget
9 it. I never will, but when I walk through the crime
10 scene, not only was I grieving and emotional about
11 what I saw, but thinking how my kids could have been
12 sitting at those desks a year or two earlier. It was
13 a terrible, terrible, terrible situation.
14 Q. As a person and as the sheriff, have you
15 shared that grief with survivors of MSD?
16 A. Yes.
17 Q. Do either of the incidents, the Eason
18 incident and the Treijs -- let me change that from
19 "incident" -- interactions.
20 Do either of those interactions, Eason and
21 Treijs, that are used as accusatory comment by the
22 governor have anything to do with whether the shooter
23 would have been on the streets on February 14, 2018?
24 A. Not one thing.
25 Q. Do either of those events involve criminal

FOR THE RECORD REPORTING TALLAHASSEE FLORIDA 850.222.5491

1 and we're always cognizant of those things. 367
2 Q. And not in any way intending to diminish or
3 demean the requirement to follow the rules, what do
4 you understand the rule violations were that led to
5 these two officers being disciplined?
6 A. It's my understanding that they did not
7 completely document or contact as fully as they should
8 have, and one of the deputies, it was his second
9 offense, so he received a more severe discipline than
10 the other deputy. But there were no risk protection
11 orders in effect at the time. There were no weapons
12 seen. They never even saw the killer. There were
13 no -- they wouldn't have been able to arrest him or
14 charge -- it was nothing like that. It was just
15 the -- they should have done more documentation.
16 Q. So on February 5, 2016, Deputy Eason received
17 a report of a student Instagram with a gun and the
18 words "I'm going to shoot up the school." Is that
19 what you understand the Eason matter to be?
20 A. Yes.
21 Q. And he did not report that in an incident
22 report, just a note?
23 A. Yes.
24 Q. And the nature of the computer system at the
25 BSO is that incident reports get categorized one way

FOR THE RECORD REPORTING TALLAHASSEE FLORIDA 850.222.5491

1 and are searchable, and notes don't rise to the level³⁶⁸
2 of a searchable incident?
3 A. That's correct.
4 Q. So if you're typing in the name of a suspect,
5 you would link to all the offense/incident reports
6 that show up for that?
7 A. That's correct.
8 Q. But a note is not automatically connected?
9 A. That's correct.
10 Q. It's only connected once you look at
11 information and essentially drill down to see the
12 note?
13 A. That's correct.
14 Q. So Eason was disciplined that he should have
15 done an incident report?
16 A. That's correct.
17 Q. And you ultimately approved that discipline?
18 A. Yes.
19 Q. Now, on November 30, 2017, Deputy Treijs --
20 by the way, you were not aware of Eason's failure to
21 report in real time?
22 A. I had never even heard his name before.
23 Q. The deputy's?
24 A. Correct.
25 Q. Are there that many deputies you don't know

FOR THE RECORD REPORTING TALLAHASSEE FLORIDA 850.222.5491

1 Q. Was --³⁷⁰
2 A. Counsel, let me just add -- I think this is
3 important -- we get approximately almost 750,000 calls
4 for service a year. It's not logical to think that a
5 sheriff would be apprised of calls for service. I
6 mean, how would that -- it's just not fathomable.
7 Q. Is that in the ordinary handling of a
8 sheriff's office, that there are means and priorities
9 to get matters to your attention?
10 A. Exactly.
11 Q. But is the training that you oversee and
12 implement designed to appropriately train your
13 officers to handle things correctly?
14 A. Exactly. Yes, sir.
15 Q. Did you, after becoming aware of the Treijs
16 incident, learn in follow-up that Palm Beach County
17 Sheriff's Office did nothing with the report when it
18 was made to them about somebody in their county?
19 A. I was told that.
20 Q. And while there's never an excuse for not
21 doing things correctly, did the Treijs report as
22 given, would that information have led to an
23 arrestable offense?
24 A. No.
25 Q. And by the way, if the subject was in Palm

FOR THE RECORD REPORTING TALLAHASSEE FLORIDA 850.222.5491

1 each of them individually?³⁶⁹
2 A. Well, we have 6,000 people on the agency and
3 approximately 1,800 deputies. It's really impossible
4 to know everybody with that large an agency.
5 Q. Deputy Treijs on November 30, 2017, received
6 a report -- a call that a shooter had weapons and
7 wanted to kill people, and he directed the caller to
8 another police department because the person who was
9 calling was for Palm Beach, had no idea where the
10 individual was, and no immediate information about the
11 individual?
12 A. Right.
13 Q. And Deputy Treijs wrote, "Note, the person is
14 described as autistic and no current information"?
15 A. That's correct.
16 Q. And Deputy Treijs was reported for not fully
17 making that an incident report?
18 A. That's correct.
19 Q. And was disciplined appropriately as far as
20 you approved?
21 A. Yes.
22 Q. Now, did you have information on November 30,
23 2017, that somebody had reported this information to
24 Deputy Treijs?
25 A. No.

FOR THE RECORD REPORTING TALLAHASSEE FLORIDA 850.222.5491

1 Beach County, who ordinarily, as you understand state³⁷¹
2 law enforcement responsibilities and statutory
3 authorities, had the law enforcement responsibility in
4 Palm Beach County?
5 A. Well, if it was a city, it would have been
6 the whatever city --
7 Q. West Palm Beach or --
8 A. Right. Or if it was the county, the Palm
9 Beach County Sheriff's Office.
10 Q. You mentioned the Pompano Beach training even
11 had helicopters repelling?
12 A. We did.
13 Q. At the Marjory Stoneman Douglas shooting, did
14 you learn that Deputy Madrigal from Fort
15 Lauderdale-Hollywood Airport was actually piloting an
16 aircraft over Marjory Stoneman Douglas in an effort to
17 assist and aid in the process?
18 A. I did learn that.
19 Q. And that another aircraft, a second Broward
20 County Sheriff's Office aircraft, had been dispatched
21 to survey the area?
22 A. Yes. So much of the training that we had
23 instituted and implemented was evident at not only the
24 airport, but also the massacre at Marjory Stoneman
25 Douglas. The training that the deputies had received

FOR THE RECORD REPORTING TALLAHASSEE FLORIDA 850.222.5491

1 was evident.

2 Q. Now, it took a significant amount of time to
3 unravel all that happened and didn't happen at Marjory
4 Stoneman Douglas; fair to say?

5 A. Yes.

6 Q. But you were at Marjory Stoneman Douglas?

7 A. Yes.

8 Q. And was there a command staff, a command
9 post?

10 A. Of course there was. As soon as I got there,
11 they had a TOC set up, a --

12 Q. A TOC?

13 A. -- tactical operations center, and that's
14 where the SWAT command was. There was colonels --
15 they had Colonel (inaudible), Colonel Dale was there,
16 investigations were there, and then a command center
17 was later set up. And there's been talk -- I don't
18 really even believe that the special council for the
19 governor even understands what a command center is or
20 what it's supposed to do to write the things that were
21 written in that, it was just so egregious, but I
22 wouldn't have allowed them to go over to the command
23 center at that time even if it was set up. There were
24 thousands of people, parents, people looking for their
25 children. It was -- it was complete turmoil. There

FOR THE RECORD REPORTING TALLAHASSEE FLORIDA 850.222.5491

1 A. Could you repeat your question, sir?

2 Q. Did BSO cooperate and coordinate with other
3 responding agencies --

4 A. Yeah.

5 Q. -- not BSO?

6 A. Yes, certainly.

7 Q. And was that consistent with the law
8 enforcement function as you understood it?

9 A. Yes.

10 Q. Was there any breach of protocol, failure to
11 comply with accepted standards, in trying to work
12 through that operations center and deal with the
13 tragedy?

14 A. No. I -- there were so many firefighters and
15 police officers from not only the Broward Sheriff's
16 Office, but from like cities like Fort Lauderdale,
17 Coral Springs, and -- I don't remember seeing a first
18 responder from any city that wasn't working as hard as
19 he or she could to bring calmness to the community, to
20 do the things that they needed to do, to follow up, to
21 transport to the hospital. I mean, it was -- I
22 don't -- you know, I don't know how you describe it if
23 one wasn't there, but it was an incredibly terrible
24 situation. It was a massacre, and everybody was
25 trying their best. Everybody was in virgin territory.

FOR THE RECORD REPORTING TALLAHASSEE FLORIDA 850.222.5491

1 was chaos. The news media, there were hundreds and
2 hundreds of news media trucks over there. Elected
3 officers were flocking in the area. It was easier --
4 it was a better work place for them to work at this
5 tactical operation center, to run the -- it was also a
6 homicide scene, so we had to have our crime scene
7 leaders in one place directing what they want,
8 conferring with the FBI, conferring with the Florida
9 Department of Law Enforcement. The tactical
10 operations center was working seamlessly, and that was
11 the place -- I mean, I think they just pulled the term
12 "command center" out, heard that there were command
13 centers, and there was a little time getting a command
14 center set up. It doesn't matter how long it took
15 getting the command center. Was information getting
16 out as fast as it possibly could? There were radio
17 issues, horrific radio issues. Coral Springs and us
18 were on different radio channels, we had different
19 radios. Coral Springs decided not to go to a regional
20 system. So many other variables. But as long as
21 communication was as good as it could be at the top, I
22 wasn't going to let it go anywhere else anyway.

23 Q. As far as you were able to understand, was
24 the operation at Marjory Stoneman Douglas involving
25 coordination with other reporting agencies?

FOR THE RECORD REPORTING TALLAHASSEE FLORIDA 850.222.5491

1 There's no handbook on, you know, how you're going to
2 react. You just rely on your training, you do the
3 things you were taught. And everybody was working so
4 hard, yet we had a few people who should have done
5 things differently and better. But it's a race issue,
6 and when you pick first responders from the human
7 race, humans are imperfect people and --

8 Q. Let me just ask --

9 A. -- my heart goes out to the families, it
10 really does.

11 Q. Sheriff, let me ask for clarification. I'm
12 not certain that our phrase "a race issue" came across
13 as you intended. You're not talking about differences
14 in people --

15 A. No, I'm talking about --

16 Q. -- you're talking about human nature?

17 A. -- the human race, yes.

18 Q. Making -- decision-making and how people do
19 that?

20 A. Yes, that's exactly what I'm talking about.

21 Q. Now, as part of your job as sheriff, you have
22 a community responsibility. You talked about that
23 when we opened, right?

24 A. Yes.

25 Q. And was there a need for you as sheriff to

FOR THE RECORD REPORTING TALLAHASSEE FLORIDA 850.222.5491

1 communicate post Marjory Stoneman Douglas to the
2 greater community?
3 A. Yes.
4 Q. Was there concern, as you understood it,
5 about safety and safety of the children and the
6 schools?
7 A. Yes.
8 Q. As well as other potential for terrorist
9 attacks?
10 A. Yes.
11 Q. And as part of a sheriff, as part of being
12 conservator of the peace, is it your job to let the
13 public know what's going on?
14 A. Inform and educate.
15 Q. And did you do that soon after the Marjory
16 Stoneman Douglas tragedy in a town hall meeting?
17 A. I did.
18 Q. And were you situated opposite a spokesperson
19 for the National Rifle Association?
20 A. I was.
21 Q. Dana Loesch?
22 A. That's not how it was planned. I got a call
23 from the United States congressman, Congressman
24 Deutch, and he asked me to be a part of the town hall
25 meeting. He thought it would be important that I had

FOR THE RECORD REPORTING TALLAHASSEE FLORIDA 850.222.5491

1 Q. And following that interview, did you learn
2 of political attacks on you and your position
3 regarding the second amendment?
4 A. Yes.
5 Q. And at that point, did you become a campaign
6 issue by one of the candidates?
7 A. I don't know at that point. I know one of
8 the state -- one of the state reps from Florida, I
9 don't remember his name, but he called for me to
10 resign a day later or two days later. But then
11 eventually both candidates running for governor,
12 both -- or two of the Republican candidates said that
13 they would suspend the sheriff.
14 Q. One of them being now --
15 A. One of them being --
16 Q. -- Governor DeSantis?
17 A. -- Governor DeSantis.
18 Q. And in the course of that campaign for
19 governor, you were not up for election?
20 A. No.
21 Q. You were doing your sheriff responsibilities
22 during that election time?
23 A. Yes.
24 Q. And in the course of that political campaign
25 season, did you become aware of the NRA actively

FOR THE RECORD REPORTING TALLAHASSEE FLORIDA 850.222.5491

1 information to impart with the public. And when I got
2 there, not only was the congressman there, but Senator
3 Nelson, Senator Rubio, and it was kind of like a
4 sheriff doesn't belong on stage with those
5 individuals. So I was -- I was told that I wouldn't
6 be part of that segment. Of course, I said "Roger
7 that," and then I was asked if I would go on in my own
8 segment with a woman from the NRA. I said "Sure." We
9 went on. I think we were on maybe five or ten
10 minutes.
11 Q. And during that segment, did it end up that
12 there were caustic comments by the NRA because of some
13 positions you had asserted?
14 A. I think there were. I mean, my position is I
15 support the second amendment and an American's right
16 to bear arms, but I just don't want to see guns in the
17 hands of people who are convicted felons, people who
18 are on no-fly lists, and people who are suffering from
19 mental illness. I pray for them and I hope they get
20 better, but I don't think they should have guns while
21 they're fighting mental illness. And whatever my
22 opinions were, she disagreed, she made that known, and
23 there was -- to my knowledge, there was no exchange
24 between us as far as, you know, any -- there was no
25 argument.

FOR THE RECORD REPORTING TALLAHASSEE FLORIDA 850.222.5491

1 promoting your ouster from office?
2 A. Yes.
3 Q. Did you respond to the NRA?
4 A. No.
5 Q. Are you anti-gun?
6 A. No.
7 Q. You mentioned you respect the second
8 amendment?
9 A. I do.
10 Q. Your views, however, differed from at least
11 what the NRA spokesperson had -- had offered --
12 A. Yes.
13 Q. -- when it came to certain conditions for gun
14 ownership?
15 A. That's where the difference occurred.
16 Q. Now, Broward Sheriff's Office has instituted
17 a NIMS system, N-I-M-S?
18 A. Yes, we have.
19 Q. And is that part of the sheriff's oversight
20 to develop a means of communication from top to
21 bottom --
22 A. It is.
23 Q. -- at the sheriff's office?
24 A. Yes.
25 Q. And are there certification standards that --

FOR THE RECORD REPORTING TALLAHASSEE FLORIDA 850.222.5491

1 that BSO has obtained in developing that
2 communications model?

3 A. Yes.

4 Q. And does the sheriff's office require that
5 all of its staff members, all of its 5,000 plus staff
6 members, go through appropriate NIMS training?

7 A. Yes.

8 Q. And is that an approach that helps you
9 develop policy and practices, as well as training, for
10 the sheriff's office?

11 A. Yes.

12 Q. All components of it?

13 A. All components.

14 Q. And if I brought out to you Exhibits 22
15 and -- 21, 22, and 23, Israel Exhibits 21, that's
16 Israel page 1863, Israel Exhibit 22 marked as Israel
17 1771, and Israel Exhibit 23, Bates No. Israel 1776 --
18 I'm not -- if you need to see them, I'll show them to
19 you, but those are documentation of the NIMS
20 certification and training for all the people at BSO,
21 right?

22 A. Right.

23 Q. As well as an explanation of the NIMS model
24 or NIMS process?

25 A. Yes, sir.

FOR THE RECORD REPORTING TALLAHASSEE FLORIDA 850.222.5491

1 on BSO and the law enforcement officers who served the
2 community?

3 A. Yes.

4 Q. Some sense of distrust?

5 A. Morale at the agency was low. There was so
6 much false information out there. And there might
7 have been accurate information out there, but it was
8 only 11 days after the massacre. Nobody really had a
9 handle on -- investigation was still in the embryonic
10 stages. There was so -- I can go on and on and on and
11 tell you about made-up, fictional reports that were
12 out there. There was one with what I remember that
13 was bizarre that said -- it was on one of the national
14 news networks that said that when I arrived on the
15 scene, the first radio transmission I gave was for
16 deputies not to enter into Marjory Stoneman Douglas to
17 look for the killer without body cameras. Only the
18 deputies with body cameras --

19 Q. That you made that announcement?

20 A. Yeah. If it wasn't so dreadfully serious, it
21 would have been classified as silly. When I arrived,
22 the killer was already in custody at another location.
23 I'm a former SWAT commander, I'm a tactical person,
24 and I know what our training would be. I never got on
25 the radio, I never said anything on the radio. So to

FOR THE RECORD REPORTING TALLAHASSEE FLORIDA 850.222.5491

1 Q. Sheriff, I want to close with -- with you
2 with one area.

3 A. Yes, sir.

4 Q. And I'm going to hand you the Governor's
5 Exhibit S, the Governor's Exhibit S, as in Sam. It's
6 a transcript of an interview with Jake Tapper.

7 A. Yes.

8 Q. February 25, 2018. So soon after the Marjory
9 Stoneman Douglas interview.

10 A. Thank you.

11 Q. You've read that?

12 A. I have.

13 Q. You're familiar with it?

14 A. Yes.

15 Q. You did go -- you did go on CNN for an
16 interview. And was that part of your role and
17 responsibilities of community informing?

18 A. Self-imposed, yes.

19 Q. Was the community still reeling from,
20 reacting from the realization of the scope of the
21 Marjory Stoneman Douglas tragedy?

22 A. So much.

23 Q. And did you feel that -- from the community
24 that there was some potential for false attacks on
25 dep- -- not physical attacks, but relational attacks

FOR THE RECORD REPORTING TALLAHASSEE FLORIDA 850.222.5491

1 even say that -- but these are the things that were
2 out there. And if you don't -- sometimes if you don't
3 feed the story, people say what they want. And I knew
4 I had to go on to -- my sole -- my two-fold purpose,
5 one was to inform the community of anything that the
6 moderator might ask, but the other was to let folks
7 know that BSO, if, God forbid, something like this
8 happens tomorrow, the next day, next week, you can
9 have confidence in this agency. We're prepared to
10 handle what we need to, as prepared as any agency
11 could be.

12 Q. If you had to do that interview over again,
13 would there be any differences?

14 A. Yes. There would be one. I don't know if
15 this is what -- where I would be going, but at one
16 point in the interview, I used the term "amazing
17 leadership" about myself. I've apologized, and anyone
18 who's listening today, I apologize for the use of that
19 term. My sole focus -- the only group that I wanted
20 to say were amazing were the men and women I work
21 with. I just wanted to say don't judge one great
22 agency on one incident, judge them by the body of
23 their work. I apologize for the use of that word.
24 I'm not an "I" guy, I'm a "we" -- a "we" leader. I
25 talk about the group, not myself. And leaders don't

FOR THE RECORD REPORTING TALLAHASSEE FLORIDA 850.222.5491

1 go on and tout themselves. They let other people talk³⁸⁴
2 about them. I just wanted to let the community know
3 that our agency was ready to handle what was coming
4 our way, and I apologize for saying that.
5 Q. When you were elected and then reelected, do
6 you believe that you were elected to serve as sheriff
7 for that entire four-year term?
8 A. Absolutely.
9 Q. Is that your promise to the people of Broward
10 County?
11 A. My absolute promise to serve and fulfill my
12 term and then some.
13 Q. And in the course of fulfilling that term,
14 have you done all that you reasonably could to be an
15 effective, capable sheriff of Broward County?
16 A. I'll answer that this way because a lot of
17 people are meeting me for the first time and don't
18 know me, but if my wife were here today, she'd tell
19 you I've been a good husband, and if my kids were here
20 today, they'd tell you I've been a good dad, and if my
21 community were here today, they'd tell you I've been a
22 good sheriff.
23 Q. And do you intend to fulfill that promise to
24 serve the people of Broward if the senate deems you to
25 be able to do that?

FOR THE RECORD REPORTING TALLAHASSEE FLORIDA 850.222.5491

1 or you and your attorney discussed? ³⁸⁶
2 A. Right.
3 Q. Meaning every employee within Broward
4 Sheriff's Office is acting under your authority as the
5 sheriff?
6 A. Yes.
7 Q. Okay. And in the chain of command within
8 Broward Sheriff's Office, you were the ultimate
9 decision-maker then?
10 A. Yes.
11 Q. Meaning if you wanted to go to the left,
12 everybody had to go to the left?
13 A. I don't understand what you're saying.
14 Q. Meaning if you wanted a policy to go one
15 direction, that's the direction the policy was going
16 to go?
17 A. Correct.
18 Q. Didn't matter if anybody else in the agency
19 said "We don't want to go that way," it was your
20 decision?
21 A. After listening to every member of the agency
22 that I want -- that I thought should weigh in or would
23 weigh in when a policy was going to be changed or not
24 changed or re-created or created, I would have final
25 say.

FOR THE RECORD REPORTING TALLAHASSEE FLORIDA 850.222.5491

1 A. If that's the senate's will, I will fulfill ³⁸⁵
2 my term, yes.
3 MR. KUEHNE: I tender the witness.
4 SPECIAL MASTER: Thank you. We're going to
5 take a 10-minute break and we're going to come
6 back with cross examination by Mr. Primrose and
7 Mr. MacIver. And we'll reconvene at 10 minutes
8 till 11:00. Thank you.
9 (Brief recess.)
10 SPECIAL MASTER: Mr. Primrose, it's your
11 witness under cross examination. Please proceed.
12 MR. PRIMROSE: Thank you, Special Master.
13 CROSS EXAMINATION
14 BY MR. PRIMROSE:
15 Q. Mr. Israel, when you were elected to hold
16 sheriff within Broward County, you understood that it
17 was solely under your authority that the sheriff
18 office would exist, right?
19 A. Yes.
20 Q. And that's because any function that occurs
21 within Broward Sheriff's Office is done entirely under
22 what -- either your constitutional -- the creation of
23 your constitutional office, right?
24 A. Right.
25 Q. Or the Florida Statutes that we discussed --

FOR THE RECORD REPORTING TALLAHASSEE FLORIDA 850.222.5491

1 Q. Okay. And because of that, that also means ³⁸⁷
2 if you didn't want to hire a deputy or any other
3 personnel, you could have ultimately made that
4 decision?
5 A. Yes.
6 Q. And you could have ultimately made a decision
7 whether an employee was promoted?
8 A. Yes.
9 Q. Demoted?
10 A. Yes.
11 Q. You could have had the ultimate decision on
12 deputy assignments?
13 A. Yes.
14 Q. And you also -- as you mentioned, you had the
15 ultimate to say on all agency policy decisions?
16 A. Correct.
17 Q. And that includes any training decisions?
18 A. Correct.
19 Q. And we heard some testimony yesterday that I
20 think needs some clarification, and it was questions
21 asked by your counsel regarding FDLE and the Criminal
22 Justice Standards and Training Commission. Do you
23 remember some of those questions?
24 A. Questions that were posed to me, sir, or
25 posed to other witnesses?

FOR THE RECORD REPORTING TALLAHASSEE FLORIDA 850.222.5491

1 Q. Posed to other witnesses that were testifying³⁸⁸
2 on your behalf.
3 A. Well, they weren't testifying on my behalf.
4 They were just testifying to the truth and facts.
5 Q. But they were on your witness list?
6 A. They were on my witness list, but not
7 testifying on my behalf. So if you're going to ask a
8 question, I would -- it's up to the Special Master,
9 but I would think if you're going to ask a question
10 about another witness, you would ask it to the other
11 witness. I can't answer for them, sir.
12 Q. Okay. But you were sitting here when they
13 were asked some questions?
14 A. Yes, sir.
15 Q. And you -- you would agree with their
16 answers, that FDLE nor the CJSTC have a requirement
17 for active shooter training?
18 A. To my knowledge, they don't.
19 Q. Okay. And you'd agree that a Florida law
20 enforcement officer is required by CJSTC to have 40
21 hours of training every four years, right?
22 A. To my knowledge, yes.
23 Q. Okay. And are you aware of what the topic
24 areas are within that 40 hours of training?
25 A. I believe -- you mean diffusion -- or

FOR THE RECORD REPORTING TALLAHASSEE FLORIDA 850.222.5491

1 individual law enforcement agencies in the State of³⁹⁰
2 Florida?
3 A. I would agree.
4 Q. Okay. And so that means that -- there was
5 some questions asked -- an officer in a small rural
6 town that might only have one stoplight, one school,
7 is not going to have the same training required of one
8 that might be in Miami-Dade?
9 A. I certainly can't answer that question. I
10 can only answer the training that we need to supply in
11 Broward County. It would be unfair to ask me to
12 compare what other officers or deputies would need in
13 other places that I've never been to.
14 Q. Yeah. But I think you'd have to at least
15 agree that it wouldn't be necessarily logical for the
16 training that say is required by the Miami-Dade Police
17 Department is the same training that would be required
18 for the smallest rural town in Florida?
19 A. I couldn't possibly answer that question.
20 Q. Okay.
21 A. Ask me about training that is apropos for
22 Broward County.
23 Q. That's absolutely fair that that's your
24 opinion. So -- but you would agree that each agency
25 leader, meaning each sheriff or each police chief, has

FOR THE RECORD REPORTING TALLAHASSEE FLORIDA 850.222.5491

1 de-escalation might be one topic. You'd have to³⁸⁹
2 refresh my memory.
3 Q. So if I told you that the topic areas that
4 were covered were traffic stops and discriminatory
5 profiling, domestic violence, juvenile sex offender
6 investigations, human diversity training --
7 A. Human diversity training.
8 Q. -- and use-of-force scenario-based training,
9 that's within -- that sounds about right to you?
10 A. Does sound about right, yes.
11 Q. Okay. And you realize that those five areas
12 are ones that are either authorized or required by
13 Florida State Statute?
14 A. Yes.
15 Q. And those are just minimum requirements to be
16 a law enforcement officer anywhere within the State of
17 Florida, right?
18 A. Correct.
19 Q. But CJSTC nor the Florida Department of Law
20 Enforcement dictate specific training to any other
21 agency within the State of Florida, right?
22 A. Are you telling me that or asking me that?
23 I'm not sure.
24 Q. I'm asking you if you agree with that, that
25 CJSTC does not dictate training policies for

FOR THE RECORD REPORTING TALLAHASSEE FLORIDA 850.222.5491

1 a responsibility to determine which additional³⁹¹
2 training is -- is best for their agency?
3 A. I would agree with that.
4 Q. And which training should go above and beyond
5 the basic training that's required by -- by CJSTC and
6 Florida Department of Law Enforcement to be a law
7 enforcement officer?
8 A. I would agree.
9 Q. Okay. And in the county, you've already said
10 that that's the sheriff's responsibility then, what
11 additional training above and beyond the minimums?
12 A. Yes.
13 Q. Okay. Now, a new graduate from the law
14 enforcement academy or the police academy doesn't
15 necessarily have all the training that would be
16 required to be a BSO deputy, right?
17 A. Well, when they graduate, they have all the
18 training that they're required to be a deputy, of
19 course, or they wouldn't be graduating from the
20 academy. The academy is giving them their certificate
21 and they're saying they're a full-fledged deputy, able
22 to work wherever the leader would want them to work.
23 Q. But we heard yesterday from Detective Curcio
24 that different agencies have different field training
25 that officers are required to go to even after they've

FOR THE RECORD REPORTING TALLAHASSEE FLORIDA 850.222.5491

1 completed their minimum training at the police 392
2 academy?
3 A. Well, the field training is -- that's
4 probably the second most important thing an agency can
5 do. The most important thing you can do, sir, is to
6 hire the right people, and the second most important
7 thing is to train the people the right way. So you're
8 not going to take a person who graduated the police
9 academy and put them out in the streets of your county
10 without having a field training officer under -- you
11 know, train them, monitor them, evaluate them, and
12 make sure that he's doing reports or she's doing
13 reports, evaluating that, you know, newly-hired
14 officer to make sure they can do the job and, you
15 know, you're getting feedback on them.
16 Q. But it's not just newly-graduated police
17 officers from the academy, because as we heard
18 Detective Curcio say, he had 30 years of law
19 enforcement experience and he was still required to go
20 through Broward Sheriff's Office field training,
21 right?
22 A. New officers to the agency, probably 90
23 percent of them are going to come out of the academy,
24 and I assume some are going to come from other
25 agencies or other places, but anyone who's new to your

FOR THE RECORD REPORTING TALLAHASSEE FLORIDA 850.222.5491

1 FDLE? 394
2 A. That's correct.
3 Q. It's not training that's mandated by CJSTC?
4 A. That is correct too.
5 Q. Nor the legislature?
6 A. Nor the legislature.
7 Q. And you testified this morning about the fact
8 that your deputies who respond to Marjory Stoneman
9 Douglas were carrying tourniquets?
10 A. A lot of them were carrying kits.
11 Q. Kits?
12 A. Yes.
13 Q. And you highlighted that thankfully they have
14 those kits because they were able to save additional
15 lives that were brought to the hospital, right?
16 A. And not only deputies from the Broward
17 Sheriff's Office, but these police officers from other
18 agencies as well.
19 Q. Okay. Tourniquets aren't covered in first
20 aid training under CJSTC guidelines, correct?
21 A. I don't think so.
22 Q. So the deputies that you hired to BSO, they
23 would have required additional training on how to use
24 field tourniquets and other first aid measures?
25 A. Correct.

FOR THE RECORD REPORTING TALLAHASSEE FLORIDA 850.222.5491

1 agency. 393
2 Q. And your field training -- your field officer
3 training is a specific requirement to your agency?
4 A. Yes.
5 Q. There's no FDLE requirement that there's a
6 field training program for each agency?
7 A. Correct.
8 Q. And you didn't need a direction from CJSTC to
9 create a field training program?
10 A. No.
11 Q. And, in fact, you don't need the legislature
12 to pass a statute or law that you have a field
13 training program specific to your agency?
14 A. No.
15 Q. And I think you had testified your job is to
16 make sure that you hire the best and that you provide
17 them the best tools to complete their jobs, right?
18 A. That's correct.
19 Q. Okay. In Broward sheriff's, your officers at
20 the time used mobile data terminals, correct?
21 A. Correct.
22 Q. And they needed to be trained on those
23 terminals?
24 A. Yes.
25 Q. And that's not training that's mandated by

FOR THE RECORD REPORTING TALLAHASSEE FLORIDA 850.222.5491

1 Q. And, again, FDLE doesn't require you to do 395
2 that training?
3 A. Correct.
4 Q. They didn't set the minimum standards?
5 A. No.
6 Q. CJSTC didn't do that?
7 A. No.
8 Q. The legislature didn't pass a law saying that
9 each agency needs to teach how to use a tourniquet?
10 A. No.
11 Q. And so you would agree with me, then, that
12 it's the sheriff that requires additional training
13 when he believes -- he or she believes it's necessary
14 for the agency to adequately protect the community?
15 A. I would agree with that statement.
16 Q. Okay. And it's not FDLE's responsibility
17 that a sheriff office have additional training?
18 A. Certainly not.
19 Q. Not CJSTC's?
20 A. No.
21 Q. Not the governor's?
22 A. No.
23 Q. Not the legislature's?
24 A. No.
25 Q. And as we heard in questions from your

FOR THE RECORD REPORTING TALLAHASSEE FLORIDA 850.222.5491

1 counsel, it's not even Congress' responsibility to 396
2 ensure that a sheriff implements the additional
3 training that he or she feels is necessary for
4 their -- their deputies?
5 A. Correct.
6 Q. Okay. Now, if you wanted to, you could
7 implement certain additional trainings?
8 A. Yes.
9 Q. You could make trainings more frequent?
10 A. Not necessarily, no. I would disagree with
11 that, and here's why: There's a -- a national issue
12 of law enforcement. There are many vacant positions.
13 So if you can't fill vacancies on an agency, there's a
14 lot of training that you can't do or do as often as
15 you want because you can't leave the road or the
16 community short of police officers. So sometimes you
17 might want to do three, four trainings on something a
18 year, but especially in the agency like the Broward
19 Sheriff's Office, for example, if somebody would have
20 recommend maybe we can train our school resource
21 deputies more often, you can't take them out of
22 schools. They need to be there to protect children.
23 So just because you see sometimes the need for more
24 training, you don't have the manpower because of
25 vacancy issues and you're not able to do that. So

FOR THE RECORD REPORTING TALLAHASSEE FLORIDA 850.222.5491

1 training that has to go into being a field training 398
2 officer -- I mean a school resource officer.
3 Q. Right. And it was your decision to only make
4 school resource officers go to an annual training in
5 the summertime?
6 A. Correct.
7 Q. But not in -- not during spring break?
8 A. Correct.
9 Q. Not during their Christmas break?
10 A. Correct.
11 Q. And, again, that's something that you could
12 have implemented, you could have required not even
13 just school resource officers, but any of the deputies
14 in your agency to attend certain trainings more
15 frequently?
16 A. Right, but I must say this: We were well
17 within the industry standard of training of agencies
18 our size to mandate that deputies go through active
19 killer training once every three years, with an agency
20 of 1,800 deputies or thereabouts is well within
21 industry standard, and our deputies were receiving the
22 appropriate training and they were receiving the right
23 amount of training.
24 Q. But, again, I want to go back to this, it was
25 your decision, you could have prioritized certain

FOR THE RECORD REPORTING TALLAHASSEE FLORIDA 850.222.5491

1 there's a lot of things that go into -- especially 397
2 with agency our size, there's a lot of variables that
3 go into it.
4 Q. How many days a week is school in session
5 when the school is normally in session?
6 A. Five.
7 Q. Five. So that leaves two days a week that
8 they're not in session?
9 A. Correct.
10 Q. And do you know how many days a year school
11 is actively in session?
12 A. Thirty something.
13 Q. Okay.
14 A. Forty.
15 Q. And they've got summer break, they've got
16 spring break, and they Christmas break. So there's at
17 least three opportunities throughout a calendar year
18 where the deputy assigned to the school doesn't have
19 to -- isn't doing his normal SRO duties, correct?
20 A. Right, but the -- and that's when we do the
21 predominant amount of our training because of exactly
22 what you said, when the deputies are off during the
23 summer -- or when the schools are off during the
24 summer, the summer months are when we -- are when we
25 concentrate on the field training, all the mandatory

FOR THE RECORD REPORTING TALLAHASSEE FLORIDA 850.222.5491

1 trainings more often, right? 399
2 A. Right.
3 Q. You could have prioritized certain trainings
4 longer, make them more extensive trainings, right?
5 A. Yes.
6 Q. Okay. And you could have made the school
7 resource officers do the active shooter training on a
8 more frequent basis than just -- than just once every
9 three years?
10 A. Yes.
11 Q. And you already testified that you were
12 familiar with Florida Statute 30.15?
13 A. Yes.
14 Q. And that's the duties and responsibilities
15 of an elected sheriff in the State of Florida, right?
16 A. Yes.
17 Q. And there was a long discussion about what
18 really was the responsibility of a sheriff, and my
19 words in my opening statement were taken, and you said
20 you disagreed with me as to what I said what
21 "conservator of the peace" meant, right?
22 A. Yes.
23 Q. And are you aware that the -- the words that
24 I was using were actually from a Florida District
25 Court of Appeal case?

FOR THE RECORD REPORTING TALLAHASSEE FLORIDA 850.222.5491

1 A. No. 400
2 Q. Your attorney didn't show you in the
3 memorandum that we wrote that he went through that
4 that actually is from a Florida Fifth District Court
5 of Appeal decision called State v. ARR?
6 A. I think it was the interpretation rather than
7 the words, the way you were interpreting it.
8 Q. Okay. Let's do this exercise: The case
9 there -- and it's highlighted -- says, "Section 30.15
10 states in relevant part sheriffs in person or by
11 deputy shall be conservators of the peace."
12 Do you agree that that's the first sentence
13 of the highlighted portion?
14 A. Yes.
15 Q. And then it says, "And in a complex society,
16 police are charged with the duty to protect people and
17 property wherever they are situated under a variety of
18 circumstances," right?
19 A. Yes.
20 Q. That's the first thing I said is they are
21 charged with a duty to protect people and property.
22 The second -- or the last sentence there
23 highlighted says, quote, "In performing this duty,
24 they're required to protect against crime without
25 waiting for it to occur," right, that's what it says?

FOR THE RECORD REPORTING TALLAHASSEE FLORIDA 850.222.5491

1 important point to mention. 402
2 Do you agree that the deputies that you
3 assign or appoint are acting under your authority as
4 sheriff?
5 A. Yes.
6 Q. And are you familiar with Florida Statute
7 30.07?
8 A. I think so.
9 Q. And are you -- do you agree that it says that
10 because sheriffs appoint deputies, the deputy -- or
11 the sheriff is also responsible for the neglect or
12 default of the deputies that they appoint?
13 A. You'd have to show that to me, but I would --
14 I would think that that's accurate.
15 Q. Okay. Would you like me to show it to you?
16 I can.
17 A. No.
18 Q. Okay. So you'd at least agree that it
19 says -- and I'm jumbling up the way the words are
20 ordered, but essentially because the sheriff has to
21 appoint deputies to act with the sheriff's authority,
22 the sheriff is responsible if the deputies are
23 neglect -- commit neglect or default?
24 A. Yes.
25 Q. Okay. Now, I want to talk about -- there are

FOR THE RECORD REPORTING TALLAHASSEE FLORIDA 850.222.5491

1 A. Yes. 401
2 Q. And that's exactly what I said, right?
3 Didn't I say in my opening that the conservator of the
4 peace also includes a duty to protect against crime
5 without waiting for it to occur?
6 MR. KUEHNE: Objection.
7 SPECIAL MASTER: Please proceed.
8 MR. PRIMROSE: Thank you.
9 BY MR. PRIMROSE:
10 Q. That comment that I said was taken exactly
11 from a Fifth District Court of Appeal case from the
12 State of Florida.
13 A. I -- if you said it like that, that's not how
14 I received what you were saying. I received as you
15 were saying that it's the responsibility of a sheriff
16 to eliminate crime and to prevent crime from
17 happening, and we both know that's an impossibility.
18 Q. Okay. Now, you'd also agree --
19 MR. KAPLAN: Special Master, I don't mean to
20 interrupt, but the exhibit --
21 SPECIAL MASTER: I'm sorry. Please proceed.
22 MR. PRIMROSE: Okay. Thank you.
23 BY MR. PRIMROSE:
24 Q. Now, we didn't go into this -- you didn't go
25 into this on direct examination, but I think it's an

FOR THE RECORD REPORTING TALLAHASSEE FLORIDA 850.222.5491

1 a lot of discussion about these organizations that 403
2 exist across the United States and globally. One of
3 them was CALEA. And you're familiar with CALEA?
4 A. CALEA?
5 Q. CALEA, excuse me. You're familiar with
6 CALEA?
7 A. Yes.
8 Q. And CALEA is actually a voluntary
9 organization?
10 A. It is.
11 Q. There's no mandate from the State of Florida
12 that a sheriff's office or police office be a part of
13 this organization?
14 A. That's correct.
15 Q. And isn't it also true that CALEA requires
16 the law enforcement agencies to pay to be a member of
17 CALEA?
18 A. That's correct.
19 Q. And you're paying to get access to some model
20 policies that CALEA wants the agencies to follow,
21 right?
22 A. I don't necessarily know that to be the
23 reason you pay, no.
24 Q. Were you aware that the way that CALEA
25 accredits an agency is by looking to see how many

FOR THE RECORD REPORTING TALLAHASSEE FLORIDA 850.222.5491

1 CALEA policies are adopted by the agency? 404
2 A. Well, that's one dimension of CALEA, but they
3 do so much more than that. I've been there for their
4 reviews.
5 Q. Okay. And CALEA -- BSO being an accredited
6 agency under CALEA wasn't something new under your
7 tenure as the sheriff, right?
8 A. No.
9 Q. Right. BSO's actually been paying to be an
10 accredited member of CALEA since 1999?
11 A. I didn't know that.
12 Q. Okay. And there were a couple other -- you
13 remember seeing the exhibit from your attorney showing
14 all the different accreditations that BSO has?
15 A. Yes.
16 Q. Is it fair to say that none of the
17 accreditations on that sheet were new under your
18 tenure as the sheriff?
19 A. I'm not sure.
20 Q. Okay. We can pull it up if you'd like, but
21 I'd submit to you that none of the accreditations that
22 have been highlighted -- and this is Exhibit --
23 A. All you'd have to do is also pull up the
24 dates of their first accreditation and that would --
25 Q. Yeah. So let's -- well, this is Israel

FOR THE RECORD REPORTING TALLAHASSEE FLORIDA 850.222.5491

1 Q. You had your command staff included? 406
2 A. Yes.
3 Q. You had the road patrol, you got their input,
4 right?
5 A. Well, actually, it was -- it went the other
6 way. The command staff got the road patrol or whoever
7 they got involved, and then command staff came to see
8 me to discuss they felt it rose to -- you know, it was
9 an important policy and it rose to my level, and they
10 were absolutely right. So then I engaged in
11 conversations with command staff.
12 Q. Okay. Am I correct in my understanding that
13 the introduction of 4.37, the active shooter policy,
14 was under your tenure as sheriff, meaning the creation
15 of the policy in the Broward Sheriff's Office standard
16 operating procedure occurred under your tenure?
17 A. The first policy ever on active shooter? I'm
18 not sure.
19 Q. Okay. I want to show you -- this is Israel
20 Exhibit 4. And Israel Exhibit 4, the first page of
21 that says "Date, October 4, 2013."
22 THE WITNESS: Special Master, may I get up to
23 read it? I can't really see it too well from this
24 manner.
25 SPECIAL MASTER: Can you see that screen?

FOR THE RECORD REPORTING TALLAHASSEE FLORIDA 850.222.5491

1 Exhibit 11, and we'll just start with law enforcement. 405
2 CALEA, first accredited 1999, and then the Commission
3 for Florida Law Enforcement Accreditation, 2001. We
4 could go through the entire list of accreditations,
5 but --
6 A. I trust -- if you say the dates pre-dated me,
7 then I would agree with you.
8 Q. Okay. And we also heard about the
9 International Association of Chiefs of Police --
10 A. Yes.
11 Q. -- right?
12 And that's not an organization that a
13 particular sheriff's office or police department
14 becomes a member of, right?
15 A. Correct.
16 Q. That's for individual members to join?
17 A. That is.
18 Q. And, again, it's individual members paid to
19 join the international association?
20 A. Yes.
21 Q. Okay. Now, lot of discussion on the active
22 shooter policy, and on direct examination, you talked
23 about it being a concerted effort to develop this
24 policy, right?
25 A. Yes.

FOR THE RECORD REPORTING TALLAHASSEE FLORIDA 850.222.5491

1 MR. PRIMROSE: That might be worse. 407
2 SPECIAL MASTER: Is that harder? The answer
3 is yes, you may certainly come closer here if
4 you'd like to do so.
5 THE WITNESS: Okay. Yeah, I don't -- I don't
6 know if that was the development of the policy or
7 if that was, you know, an amendment to the policy.
8 BY MR. PRIMROSE:
9 Q. Okay. So regardless of if it's the new
10 creation or an amendment to the policy, the policy
11 that existed -- and this says October 4, 2013, moving
12 forward says -- and I've highlighted it here -- "If
13 real-time intelligence exists, the sole deputy or team
14 of deputies will enter the area and/or structure to
15 preserve life," correct, that's what it says?
16 A. Yes.
17 Q. Okay. And when you were questioned by your
18 attorney, we heard that at some point, it was changed
19 to "may"?
20 A. Yes, sir.
21 Q. And that was your decision to change it to
22 "may"?
23 A. Yes.
24 Q. And isn't it true that after the Marjory
25 Stoneman Douglas shooting, the policy was then changed

FOR THE RECORD REPORTING TALLAHASSEE FLORIDA 850.222.5491

1 to "shall"?
 2 A. Yes.
 3 Q. But you testified on direct examination that
 4 "may" and "shall" are essentially the same word?
 5 A. When "shall" has a caveat in there,
 6 absolutely. I didn't say "may" and "shall" were the
 7 same word, but I said in a policy that says "shall"
 8 and has a comment in it that says "under reasonable
 9 circumstances" or brings a caveat in to give the
 10 officer discretion, it becomes the same as "may."
 11 Q. So what's the purpose of changing it from
 12 "will" to "may" under your tenure, and then from "may"
 13 to "shall" under your tenure?
 14 A. When we changed it back to "shall"?
 15 Q. Well, this says "will."
 16 A. This says "will" --
 17 Q. And this was in October of '13.
 18 A. And we changed it in 2016 because I felt and
 19 still feel that the policy we changed it to is better
 20 for deputies and is more in line with industry
 21 standard and other policies throughout the nation.
 22 Most of the policies that -- most of the policies from
 23 large agencies will be more aligned with "may" and the
 24 policy that I changed it to in 2016.
 25 Q. Okay. And then you'd agree with me, though,

FOR THE RECORD REPORTING TALLAHASSEE FLORIDA 850.222.5491

1 that after Marjory Stoneman Douglas, you changed the
 2 policy to "shall"?
 3 A. Yes.
 4 Q. Why?
 5 A. I was -- I had a conversation in my office
 6 with Sheriff Bob Gualtieri, who was the chairman of
 7 the Marjory Stoneman Douglas Commission, and it was
 8 one of the things that he said the group was talking
 9 about and he suggested that -- he was going to be
 10 talking about other sheriffs and he suggested that we
 11 change it back to "shall." He said that he thought,
 12 you know, "shall" was the better way to do it. So we
 13 developed a policy with "shall," and it basically says
 14 the same thing. So we -- I just did that -- I felt
 15 that, you know, I was being asked to do it, I
 16 wanted -- in the spirit of full cooperation with the
 17 commission, that's why I did it.
 18 Q. Even though you don't think the policy change
 19 from '16 to now, to 2018, has any practical
 20 difference?
 21 A. I know I'm not allowed to ask you questions,
 22 but do you see a practical difference? Not that
 23 you've ever been in police work or stuff, but I know
 24 how deputies are going to respond, and the way it was
 25 in 2016 was appropriate and within the lines of what

FOR THE RECORD REPORTING TALLAHASSEE FLORIDA 850.222.5491

1 you'd want your deputies to do and how you want your
 2 deputies to train. And you can't ask questions about
 3 policy, I don't think, without asking about the
 4 training that corresponds to it.
 5 Q. But I guess the point that I'm getting at,
 6 though, is you've testified that you don't think
 7 practically there's any difference between the policy
 8 that existed in 2016 to the policy that you
 9 implemented before -- right before you were suspended
 10 from office?
 11 A. Correct.
 12 Q. So, then, why change it? If it has no
 13 practical effect, why change it, other than to maybe
 14 try to avoid criticism that "may" provides discretion
 15 to the deputies and "shall" is a directive that you
 16 don't have discretion?
 17 A. Respectfully, it sounds like you're answering
 18 the question for me. I've already answered that
 19 question. I did it because I was asked to by Sheriff
 20 Gualtieri, and that's the answer.
 21 Q. Okay. Now, an active shooter situations, I
 22 think we all agree, are an unfortunate reality that we
 23 now have in this -- in not only the country, but the
 24 world, right?
 25 A. Yes, sir.

FOR THE RECORD REPORTING TALLAHASSEE FLORIDA 850.222.5491

1 Q. And with that, unfortunately, we know that
 2 schools are becoming a likely target for these events?
 3 A. Yes.
 4 Q. And airports at least have similarly started
 5 to be an increased target for active shooter
 6 situations?
 7 A. I don't know to be true.
 8 Q. Okay. You'd agree that -- well, you
 9 understand the word "soft target," what that phrase
 10 means?
 11 A. I do.
 12 Q. And that's defined by homeland security as an
 13 area that is easily accessible, contains large numbers
 14 of people, and has limited security --
 15 A. I would agree with that.
 16 Q. -- right?
 17 And so there's at least an understanding, not
 18 even just in law enforcement, but globally that soft
 19 targets are increasingly becoming used for active
 20 shooter -- people that want to carry out mass casualty
 21 events?
 22 A. I don't necessarily agree with that. I mean,
 23 if you're talking about -- certainly a soft target is
 24 a (inaudible), and now you have horrific people
 25 driving trucks into people when they can't find

FOR THE RECORD REPORTING TALLAHASSEE FLORIDA 850.222.5491

1 weapons. So I think we're vulnerable. We're a free 412
 2 society and I think we're vulnerable everywhere.
 3 Q. Okay. You'd agree, though -- you at least
 4 agree with me, though, that, I mean, schools are
 5 considered soft targets that are being an increasing
 6 venue for individuals to want to carry out mass
 7 casualty events?
 8 A. Well, define "increasing."
 9 Q. I mean, let's go back. So Columbine in 1999
 10 was really the first major one that's in a lot of
 11 folks' minds, right?
 12 A. Yes, sir.
 13 Q. And since that time, there have been, it
 14 unfortunately seems, more than just one every three or
 15 four years?
 16 A. Well, if you're going to ask the question,
 17 I'd ask that you give me the exact number so I can
 18 give you the answer. I don't know how many have been
 19 committed since 1999.
 20 Q. Let me ask you this: You as a sheriff for
 21 -- you were elected once, you were reelected -- can't
 22 tell me whether or not you agree that schools have
 23 become an increasing -- school shootings have become
 24 increasingly over the past 20 years?
 25 A. What do you mean by -- I ask you again,

FOR THE RECORD REPORTING TALLAHASSEE FLORIDA 850.222.5491

1 Q. Okay. And that's an area that absolutely 414
 2 needs to be prioritized by every single law
 3 enforcement agency in the United States?
 4 A. Yes.
 5 Q. Okay. And I noticed yesterday and into today
 6 you really wanted to talk about the Pompano Beach High
 7 School training exercise that occurred?
 8 A. Yes.
 9 Q. And that occurred in May of 2013, right?
 10 A. Yes.
 11 Q. So about five months after you first took
 12 office?
 13 A. Yes.
 14 Q. Okay. You talked about helicopters were
 15 involved?
 16 A. Yes.
 17 Q. You repelled a K-9 down the side of the
 18 school?
 19 A. Yes.
 20 Q. You had multiple agencies within Broward
 21 County that responded to this training exercise?
 22 A. Yes.
 23 Q. SWAT was included?
 24 A. Yes.
 25 Q. I read an article that was provided by your

FOR THE RECORD REPORTING TALLAHASSEE FLORIDA 850.222.5491

1 define "increasing." We have school shootings. 413
 2 Protecting schools is -- but when you say
 3 "increasing," every time a shooting happens anywhere,
 4 it's increased by what? I don't know what you're
 5 trying to say by "increasing."
 6 Q. Okay. Let's do it this way, then, since
 7 you're having difficulty understanding the question
 8 here.
 9 MR. KUEHNE: Move to strike.
 10 SPECIAL MASTER: Denied. Go ahead.
 11 BY MR. PRIMROSE:
 12 Q. 1999, Columbine happened, right?
 13 A. Yes, sir.
 14 Q. Since 1999, school shootings are becoming
 15 more frequent, yes or no?
 16 A. Well, are you saying that -- I don't
 17 understand what you're trying to say.
 18 Q. Let's do it this way: So between -- we know
 19 that Columbine happened in '99, the Sandy Hook
 20 massacre happened in 2012?
 21 A. Yes.
 22 Q. Today, it is more apparent to law enforcement
 23 that school shootings are a real possibility maybe
 24 compared to 20 years ago or 30 years ago?
 25 A. I would absolutely agree with that statement.

FOR THE RECORD REPORTING TALLAHASSEE FLORIDA 850.222.5491

1 counsel that the whole premise of it started with an 415
 2 SRO was approached by four -- I believe it was males,
 3 and one of them said "One of those guys has a gun,"
 4 right?
 5 A. Yes.
 6 Q. And then the SRO engaged the shooter, right?
 7 A. Correct.
 8 Q. SWAT arrived --
 9 A. Yes.
 10 Q. -- right?
 11 One of the shooters or maybe two of the
 12 shooters created a hostage situation, right?
 13 A. Yes.
 14 Q. They barricaded themselves --
 15 A. Yes.
 16 Q. -- in a classroom?
 17 Hostage negotiators were used to try to
 18 defuse the situation?
 19 A. Yes.
 20 Q. Okay. And this all happened in one day?
 21 A. Yes.
 22 Q. It was a one-day training?
 23 A. Yes.
 24 Q. How many Broward Sheriff's Office school
 25 resource officers participated in that training?

FOR THE RECORD REPORTING TALLAHASSEE FLORIDA 850.222.5491

1 A. I'm not sure. 416
2 Q. Did the training happen multiple times that
3 day?
4 A. It was one continuous training exercise.
5 Q. Okay. But I guess my point is it wasn't like
6 we're going to start the training at 9:00 a.m., it's
7 going to be a one-hour event, and then we're going to
8 start it again at 11:00 and take it to 2:00?
9 A. No, no.
10 Q. So it was you start, you finish, end of the
11 day?
12 A. Yes.
13 Q. And it was one school resource officer who
14 engaged the initial shooter, and then SWAT arrives,
15 hostage negotiators arrive, and fire rescue?
16 A. Correct.
17 Q. So it wasn't like every single Broward
18 sheriff school resource officer got a chance to
19 participate in this Pompano Beach training in May of
20 2013?
21 A. I don't know how many were there, I really
22 don't.
23 Q. You have no idea how many of your school
24 resource officers --
25 A. I don't.

FOR THE RECORD REPORTING TALLAHASSEE FLORIDA 850.222.5491

1 trying to say, but, no, we did it -- we did it that 418
2 time and the training was incredible and there were
3 lessons learned from it, and these lessons were
4 taught -- you know, we constantly train. There's so
5 much training that goes -- we have training when we do
6 clearing training, you know, we talk about active
7 killer. So it's constant, so --
8 Q. And let me get to that --
9 A. It's not going to be done every year.
10 Q. Okay. And I want to follow up on that
11 because on direct examination, you highlighted how
12 renowned it was, not just in Florida, but nationally
13 folks are wondering how the heck did Broward Sheriff's
14 Office pull off this multi-agency, large-scale active
15 shooter training?
16 A. I don't know if you'd use the word
17 "renowned," but it was -- it was talked about, and our
18 colonels and command staff would come to me and they
19 would say they would get comments, "How did you guys
20 pull this off," because it was a lot that went into
21 developing the training.
22 Q. Okay. So -- but at a bare minimum, you have
23 to be thinking we're onto something here by doing such
24 a large exercise to really test every facet of not
25 only my agency, but surrounding agencies and fire

FOR THE RECORD REPORTING TALLAHASSEE FLORIDA 850.222.5491

1 Q. -- went to a training that was designed to 417
2 test how a school resource officer and Broward
3 Sheriff's Office as a whole would respond to an active
4 shooter situation in a school?
5 A. Correct.
6 Q. And how many Broward SROs participated in
7 that training in 2014?
8 A. In which training in 2014?
9 Q. Well, the Pompano Beach High School active
10 shooter training that you did in May of 2013, how many
11 did it when the training happened in 2014, that
12 exercise?
13 A. I don't understand your question.
14 Q. Okay. Let's go back. May of 2013, you hold
15 this large-scale active shooter training at a high
16 school?
17 A. Correct.
18 Q. That training didn't happen in 2014, did it?
19 A. No.
20 Q. So no SROs under your agency attended a
21 similar full-scale exercise in 2014, right?
22 A. I mean, I would say we didn't do a full-scale
23 exercise in 2014, but I think it's also important to
24 know I don't know that any other county in the nation
25 did either. So I don't know where you're -- what your

FOR THE RECORD REPORTING TALLAHASSEE FLORIDA 850.222.5491

1 rescue, right? 419
2 A. You're telling me what I was thinking?
3 Q. I'm asking you. After you do the exercise
4 and you hear from your colonels that other law
5 enforcement agencies are asking "How did you pull this
6 off, it's great that you did this," you've got to be
7 thinking I got to do this more often, right? We've
8 got to hold a full-scale, real-life exercise in
9 schools more often because it worked so well in 2013,
10 I'm hearing that other people are asking about it, we
11 must be onto something, we need to do this more often?
12 A. I never said that. I mean --
13 Q. You never thought that?
14 A. There's -- the schools are one soft target,
15 but there are airports, there are a host of venues
16 that -- you know, there's a -- you know, got to do
17 training, you know, in different venues.
18 Q. Okay. So taking that, then, you're right,
19 there are other venues that are considered soft
20 targets that deserve full-scale, real-life exercises,
21 right?
22 A. Right.
23 Q. So you don't do the Pompano Beach training in
24 2014, maybe you do it at -- you do another soft
25 target. What about in 2015, did you do a similar

FOR THE RECORD REPORTING TALLAHASSEE FLORIDA 850.222.5491

1 full-scale exercise at Pompano Beach High School to 420
2 test the SROs and how you might respond to an active
3 shooter situation in a school?
4 A. I think in 2015 or 2016 -- you know, I would
5 have to ask you to rely on Major Shults. I know he --
6 former Major Shults, he gave a deposition. So as far
7 as the calendar of training, I can't recall the
8 calendar of training. But I know there was a
9 full-scale exercise at the airport and seaport. I
10 don't remember what month or what year it was.
11 Q. Okay. And I'll get to that, I promise you on
12 that. Instead of me asking from every single year
13 after May 2013, you'd agree with me that in 2014, '15,
14 '16, '17, or '18, Broward Sheriff's Office under your
15 direction never held another full-scale, real-life
16 exercise to test an active shooter situation in a
17 school setting?
18 A. I think that's accurate.
19 Q. Okay. And do you know if SRO Peterson took
20 part in that May 2013 training at Pompano Beach High
21 School?
22 A. I don't know.
23 Q. Okay. Any deputy who attended that training,
24 it would have been on their training log, right?
25 A. Yes.

FOR THE RECORD REPORTING TALLAHASSEE FLORIDA 850.222.5491

1 was two 4-hour blocks of training, right? 422
2 A. I don't know. You'd have to check with the
3 trainers. I don't know the calendar.
4 Q. If I told you that the folks that have
5 already testified said there was one 4-hour block that
6 was titled "Active Shooter" and then there was one
7 4-hour block that said "Rescue Task" or something
8 similar, does that sound about right to you?
9 A. Sounds about right.
10 Q. Okay. And you've already testified that the
11 two 4-hour blocks of training was once every three
12 years, meaning a deputy would do it in Year 1, but
13 they wouldn't do it in Year 2 or 3, they'd do it again
14 in Year 4?
15 A. Correct.
16 Q. Okay. And, again, you could have decided to
17 make that, instead of a three-year cycle, a two-year
18 cycle, right?
19 A. Or a five-year cycle or a six-year cycle.
20 Q. Okay. You think active shooter training
21 should have been done on a longer time cycle?
22 A. No, I think it should have been done exactly
23 how it was done. I thought --
24 Q. Three years was perfect?
25 A. Three years. It's not a perishable skill,

FOR THE RECORD REPORTING TALLAHASSEE FLORIDA 850.222.5491

1 Q. So if -- and Deputy Peterson's training log, 421
2 which is an exhibit provided by your counsel, it
3 doesn't indicate a May of 2013 training, that would
4 imply he wasn't there and did not attend that
5 training?
6 A. Correct.
7 Q. Okay. Now, going back to the active shooter
8 policy, the policy is just the words written down,
9 right?
10 A. Correct.
11 Q. And it's my understanding in some of the
12 depositions that the piece of paper that the policy is
13 written on is e-mailed to each individual deputy?
14 A. Yes.
15 Q. And they have to -- they have to attest or
16 something that they read and understood the policy?
17 A. Sign for it.
18 Q. Okay. And then the other aspect of the
19 policy is now the training that goes hand in hand with
20 the written-down policy?
21 A. Yes.
22 Q. Okay. And in 2016, you then mandate active
23 shooter training to coincide with the written policy?
24 A. Correct.
25 Q. Okay. And we've heard some testimony that it

FOR THE RECORD REPORTING TALLAHASSEE FLORIDA 850.222.5491

1 it's not, you know, studying for a chemistry test, 423
2 it's simply learning the movements and the philosophy
3 of what you need to do.
4 Q. Okay. I want to go through with you the
5 training on active shooter, and this is our Exhibit W.
6 And, Mr. Israel, I'll submit to you that this is the
7 lesson plan provided to us by BSO for the course
8 titled "Response to Active Shooter." Would you agree
9 that that's what the course title is?
10 A. Yes.
11 Q. Okay. I want to direct your attention to the
12 course agenda, and if you look at the course agenda,
13 you'll see it's broken down into five separate blocks,
14 right?
15 A. Yes.
16 MR. PRIMROSE: And Madam Court Reporter,
17 you're hearing him?
18 THE COURT REPORTER: Oh, yeah.
19 MR. PRIMROSE: I just want to make sure. And
20 you can stand up. I just wanted to make sure she
21 heard.
22 BY MR. PRIMROSE:
23 Q. So first block of time, 20 minutes spent on
24 introductions, right?
25 A. Right.

FOR THE RECORD REPORTING TALLAHASSEE FLORIDA 850.222.5491

1 Q. Right? 424
2 A. Yes.
3 MR. PRIMROSE: Okay.
4 SPECIAL MASTER: He does need to answer the
5 questions into the microphone because this is not
6 just being transcribed, it's also on the record.
7 Thank you.
8 BY MR. PRIMROSE:
9 Q. If I put that up, is that large enough for
10 you to see on the TV?
11 A. Yes.
12 Q. Okay. So the first 20 minutes is spent on
13 introductions, right?
14 A. Yes.
15 Q. The next 50 minutes is a PowerPoint
16 presentation, right?
17 A. Yes.
18 Q. And then the third block, 40 minutes is spent
19 on two to four-man bounding overwatch practice, right?
20 A. Yes.
21 Q. Bounding overwatch is essentially like a
22 leap-frog exercise, right?
23 A. Correct?
24 Q. So person in the front does something,
25 somebody behind them comes and takes over, that's --

FOR THE RECORD REPORTING TALLAHASSEE FLORIDA 850.222.5491

1 in the practical exercises, how many scenarios are 426
2 done with just a solo deputy response?
3 A. I've been in -- I've witnessed some of the
4 practical exercises, but I couldn't tell you how many
5 are done solo.
6 Q. Okay. If I told you -- and we can go down to
7 it. All right. So we've got Exercise 1. This
8 Exercise 1 --
9 A. A little larger, sir?
10 Q. Sure, of course.
11 Exercise 1, first scenario, it says "two-man
12 deputy team," right?
13 A. Yes.
14 Q. Okay. Exercise 2, "single deputy" --
15 A. Yes.
16 Q. -- right?
17 Okay.
18 A. Could you go back to Exercise 2 so I could
19 read it a little bit?
20 Q. I'm just asking you what -- if it's solo or
21 multiple people.
22 A. I'd like you to go back to Exercise 2 so I
23 can read it. If you're going to ask me anymore
24 questions on this issue, I'd like to read it.
25 Q. Mr. Israel, I promise you that after I'm done

FOR THE RECORD REPORTING TALLAHASSEE FLORIDA 850.222.5491

1 it's a multiple person leap-frog exercise? 425
2 A. Yes. It's basically developed and taught to
3 teach the units, teams, how to move towards the -- the
4 gunman and engage.
5 Q. Okay. And then there's 90 minutes spent on
6 practical exercises and scenarios, right?
7 A. Yes.
8 Q. And then a 10-minute just debrief and
9 cleanup?
10 A. Yes.
11 Q. Are you familiar in the 90 minutes -- let me
12 go back.
13 The two to four-man bounding overwatch, that
14 would not include solo deputy response to an active
15 shooter, right?
16 A. You would have to bring the instructors into
17 that. That would be something to ask the instructors.
18 Q. You as the sheriff have no idea whether or
19 not two to four-man bounding overwatch practice
20 includes single deputy response?
21 A. I know what two to four-man overwatch means,
22 what the practice means, but I'm not at the
23 instructions, so I don't know, I couldn't testify as
24 to what they're actually doing at the instruction.
25 Q. Okay. And so you couldn't actually tell us

FOR THE RECORD REPORTING TALLAHASSEE FLORIDA 850.222.5491

1 asking questions, Mr. Kuehne is going to get a chance 427
2 to go through every single question I ask and you'll
3 have a chance to follow up on any question that I
4 asked that you didn't feel you had a full chance to
5 respond. So --
6 MR. KUEHNE: Objection.
7 SPECIAL MASTER: Let me suggest that -- give
8 him an opportunity to read the whole section that
9 he is responding to. I think that's -- I think
10 that's a legitimate question on his part.
11 BY MR. PRIMROSE:
12 Q. Okay. So we'll go back, Exercise 2.
13 A. You can move up -- move it. You can keep
14 moving.
15 MR. PRIMROSE: Special Master Goodlette, at a
16 certain point, to ask to go through an entire
17 document when my question is very limited to
18 whether or not the exercise was a single deputy
19 versus two deputy, I mean --
20 SPECIAL MASTER: My concern is he's just
21 reading what you have highlighted, and I don't
22 know what else might be in there that you have not
23 highlighted that he's -- you're asking him the
24 question -- the question on. That's my only
25 concern.

FOR THE RECORD REPORTING TALLAHASSEE FLORIDA 850.222.5491

1 MR. PRIMROSE: The question was only, though,⁴²⁸
2 the -- how many individuals were asked to the
3 exercise. So, for example, the first -- Exercise
4 1, it says, "First scenario, two-man deputy team."
5 That's my sole question as to Exercise 1.
6 BY MR. PRIMROSE:
7 Q. And Exercise 2, it says, "Single deputy
8 response." We can all agree that it says that, right,
9 Mr. Israel?
10 A. Yes.
11 Q. Okay. And then Exercise 3 -- I'll give you a
12 chance to read that, but I'm seeing it says this
13 exercise is for a four-man deputy team?
14 A. Yes.
15 Q. Okay. And then -- and then it's done. So
16 one, two, three exercises, and then it says "debrief
17 and cleanup"?
18 A. Yes.
19 Q. Okay. Do you have any reason to disagree
20 with what was on there, that there were -- there are
21 three practical exercises that are gone through in the
22 four-hour training?
23 A. No reason to disagree.
24 Q. Okay. And I want to ask you about this.
25 We'll go back -- I told you we'd go back to this. So

FOR THE RECORD REPORTING TALLAHASSEE FLORIDA 850.222.5491

1 for the instructor, right?⁴³⁰
2 A. What's the question, sir?
3 Q. Under "watch," it says, "Instructors should
4 watch deputy." So the reason it says "watch" there,
5 am I correct that that is an indication for the
6 instructor, look out for the following things while
7 this single deputy is going through this exercise?
8 A. Yeah. I think a better word might have been
9 "evaluate," to evaluate the performance.
10 Q. Okay. And then it says "say." And would
11 "say" be a directive that the instructor should
12 provide some instruction or guidance to the deputy?
13 A. Yes.
14 Q. And I want to know about this last
15 highlighted line: "Remember the calvary is on their
16 way. So it's better to hold than to expose yourself
17 to unknown threats." What does that mean?
18 A. That means if you're sure that there's not
19 active killing going on; in other words, the active
20 killing is over or the suspect is barricaded, you
21 don't know where the suspect is, but your intell and
22 your senses tell you that nobody else is dying, it's
23 better to hold a position and wait for SWAT or
24 reinforcements. Has nothing to do with an active
25 killer situation.

FOR THE RECORD REPORTING TALLAHASSEE FLORIDA 850.222.5491

1 Exercise 2, the single deputy response, which I think⁴²⁹
2 is the very important part of all the testimony that
3 we've been hearing, the Exercise 2 on single deputy
4 response says --
5 A. Could you make it a little larger?
6 Q. Absolutely. There you go.
7 Deputy is going to search around a little bit
8 after hearing for gunshot, bad guy's going to be
9 distance away, blank gun firing intermittently, deputy
10 is going to move towards gunfire, passing dead
11 students and others running by him. This provides
12 real-time intell for the deputy, right?
13 A. Yes.
14 Q. Then it says, "Suspect will drop gun, raise
15 hands in surrender prior to the deputy making
16 contact"?
17 A. Yes.
18 Q. And then the single deputy is going to hold
19 the suspect at gunpoint, prone the suspect out. That
20 just means basically allow him to -- the deputy to pat
21 the suspect for guns, right?
22 A. Right.
23 Q. And then continues on, you're going to look
24 for potential weapons on the suspect.
25 Now, when it says "watch," that's a directive

FOR THE RECORD REPORTING TALLAHASSEE FLORIDA 850.222.5491

1 In an active killer situation, you're moving,⁴³¹
2 you're moving, you're moving, as I said before, to
3 either neutralize the target, arrest the target, or
4 have the target surrender. But if there was, God
5 forbid, a shooting in this room and we chased the
6 shooter outside to another room, he's still a
7 murderer, he's still a felon, we still want to arrest
8 him, but there's no reason to go into a room to take
9 him into custody without waiting for reinforcements
10 because you're not worried about innocents getting
11 hurt.
12 Q. So the directive -- and that was under the
13 "say" section -- where an instructor might tell the
14 deputy "Remember calvary is on the way" does not apply
15 if the deputy still hears gunfire?
16 A. Correct.
17 Q. Okay. Now, my understanding is that under
18 your tenure, Broward Sheriff's Office had 12 trainers,
19 and I think that was in some of the testimony we heard
20 from some witnesses. Does that sound about right to
21 you?
22 A. I think -- well, we had -- we had other
23 people that do -- when you have an agency that large,
24 you have collateral trainers. You have people that
25 might do their regular jobs, but for a certain

FOR THE RECORD REPORTING TALLAHASSEE FLORIDA 850.222.5491

1 specific training they will come off the road or away⁴³²
2 from their assignment. So how many full-time trainers
3 we had compared to, you know, vis-a-vis how many we
4 had that do collateral training, I can't answer that.
5 Q. Okay. The number of trainers, that's a
6 personnel decision that would be up to the sheriff to
7 make?
8 A. Ultimately responsible for everything on the
9 agency.
10 Q. And the more trainers you have, presumably
11 the more trainings you can do?
12 A. No, not necessarily.
13 Q. No?
14 A. You still -- the number of trainers is --
15 that's just a fallacy, and, you know -- and I honestly
16 don't appreciate you answering the question for me.
17 It doesn't mean that at all. It's not about the
18 trainers, it's about the students. And when you have
19 an agency our size with all the vacancies we have, you
20 could have 100 trainers that could give people
21 one-on-one instruction, but if you don't have the
22 ability and you're going to make the county unsafe by
23 bringing students away from their regularly-scheduled
24 assignments to protect and serve and bring them into
25 training, that's not the best thing for the community

FOR THE RECORD REPORTING TALLAHASSEE FLORIDA 850.222.5491

1 told, after the first shot.⁴³⁴
2 Q. Okay. Before we get into all the events that
3 happened that day, want to talk about the role of your
4 agency with the shooting. We've already heard, and
5 you don't disagree, right, that the Broward Sheriff's
6 Office was, in fact, the contracted law enforcement
7 agency for the airport?
8 A. I agree with that statement.
9 Q. Okay. And the essential operation of the
10 airport, grounds keeping, cleaning the floors, making
11 sure that the building is maintained, that's
12 presumably all kept with BCAD, the airport -- the
13 aviation district?
14 A. Correct.
15 Q. Okay. Broward -- the sheriff's office
16 agreement with BCAD was not unlike how the sheriff's
17 office might contract with a municipality to provide
18 law enforcement, right?
19 A. I think that's a fair statement.
20 Q. Okay. Let's talk about that. When Broward
21 Sheriff's Office is approached by a municipality,
22 "Hey, we want to outsource all of our law enforcement
23 to you," imagine you sit down with their principals
24 and go through some standard terms, right?
25 A. Yes.

FOR THE RECORD REPORTING TALLAHASSEE FLORIDA 850.222.5491

1 in my mind. So the amount of trainers or telling me⁴³³
2 what the staff has is not indicative of the quality of
3 the training or our ability to train. It's about the
4 availability of the student and the necessity of that
5 specific training.
6 Q. Okay. I want to make sure that I -- that I
7 didn't mishear anything on direct examination. You
8 don't place any fault onto Broward County School
9 District for limiting how often you can train your
10 school resource officers, do you?
11 A. No.
12 Q. Okay. We'll talk about Fort Lauderdale
13 airport shooting for a moment. Five individuals
14 unfortunately lost their lives that day at the hands
15 of the shooter?
16 A. Yes, sir.
17 Q. And the shooter ran out of ammunition at a
18 certain point, right?
19 A. Yes.
20 Q. Dropped his gun, and when Deputy Madrigal
21 approached him, the active shooting had commenced,
22 wasn't going on anymore?
23 A. You'd have to ask Deputy Madrigal what
24 time -- at what time -- whether he saw the shot. I
25 know he took him into custody within 72 seconds, I was

FOR THE RECORD REPORTING TALLAHASSEE FLORIDA 850.222.5491

1 Q. You look at the size of the municipality,⁴³⁵
2 right?
3 A. Yes.
4 Q. You look at maybe how many large buildings or
5 areas that might be of concern from a law enforcement
6 perspective, right?
7 A. Yes.
8 Q. How many schools are in the municipality?
9 A. Yes.
10 Q. You probably even look at the crime rate in
11 that municipality when entering into a discussion to
12 provide law enforcement?
13 A. Yes.
14 Q. And so if a municipality came to you and they
15 had a high percentage -- a high crime rate and said,
16 "But we only want to pay for one Broward sheriff
17 deputy to be our law enforcement for our
18 municipality," you'd probably push back in that
19 discussion, right?
20 A. I can't answer a question with supposition.
21 You would have to give me a specific question. You
22 can't give me what would I have done in this
23 (inaudible), what would I have done -- that's not
24 fair. You ask me a specific question about a specific
25 contract, I can answer it, but unless ordered to by

FOR THE RECORD REPORTING TALLAHASSEE FLORIDA 850.222.5491

1 the Special Magistrate, I'm not going to answer 436
2 questions about supposition.
3 Q. I'm just guessing -- or I'm just interested
4 in this question, though, is when you are approached
5 to provide law enforcement services to a
6 municipality --
7 A. Which municipality?
8 Q. I'm just -- in any situation, a municipality,
9 the airport district, for an outside event, you are
10 going into it with an understanding of what's going to
11 be requested of my law enforcement agency, what's the
12 threat of crime, how much crime is there, you want to
13 know all of those factors before you would ever enter
14 into an agreement to provide law enforcement services
15 for somebody outside of your agency?
16 A. I really don't even understand your question,
17 what you're trying -- I don't understand your question
18 at all.
19 Q. Let me try to break this down, and if you
20 don't want to answer hypotheticals, I'm not going to
21 ask the Special Master to require you to answer a
22 simple hypothetical, but here's what I want to --
23 MR. KUEHNE: Move to strike.
24 SPECIAL MASTER: Please proceed.
25 MR. PRIMROSE: Thank you.

FOR THE RECORD REPORTING TALLAHASSEE FLORIDA 850.222.5491

1 Q. -- with BCAD, right? 438
2 A. With the county.
3 Q. With the county to provide law enforcement
4 for BCAD?
5 A. Yes.
6 Q. So you're going to want to know all of the
7 statistics or the requirements that you're going to
8 put your agency in charge of protecting?
9 A. I'm going to want to know simply what
10 personnel BCAD is asking for, what they're willing to
11 pay for. You can't give them more resources or more
12 assets than they're going to pay for.
13 Q. Okay. Let's talk about that then. So you
14 said you do want to know how many deputies they're
15 asking for and how many they're willing to pay for?
16 A. Right. And of course, we make a
17 recommendation as to how many deputies they think they
18 should have, but, you know, if we recommend five, they
19 want 10, you know, there has to be a negotiation.
20 Q. If you want 150, they're only willing to pay
21 for 100, what happens at that point?
22 A. You'd have to give me a specific. I can't
23 give you a hypothetical answer.
24 Q. So we've already discussed that at the time
25 the airport shooting happened, there were

FOR THE RECORD REPORTING TALLAHASSEE FLORIDA 850.222.5491

1 BY MR. PRIMROSE: 437
2 Q. When you go to discuss with Broward County
3 Aviation District the contractual agreement to provide
4 law enforcement --
5 A. I've never had a discussion with aviation.
6 I've never been in on any of their conversations. So
7 I don't know what you're talking -- I can't answer the
8 question.
9 Q. You've never gone to a meeting with -- with a
10 representative of BCAD to discuss what law enforcement
11 services your agency would provide to the airport?
12 A. I don't believe I ever have. I think that's
13 all been brought back to me by staff. The
14 negotiations have been so seamless and so --
15 everybody's been on the same page, I don't believe
16 I've ever been part of a negotiation.
17 Q. But you would agree that your staff that you
18 have entrusted will come back to you with what they've
19 learned?
20 A. Yes.
21 Q. Or how their discussions went?
22 A. Yes.
23 Q. And you're ultimately the one that has to
24 sign the agreement --
25 A. Yes.

FOR THE RECORD REPORTING TALLAHASSEE FLORIDA 850.222.5491

1 approximately 122 BSO deputies that were budgeted to 439
2 the airport?
3 A. Correct.
4 Q. And based on the reports, in 2007, there was
5 actually 150 BSO deputies that were budgeted for the
6 airport, right?
7 A. Right.
8 Q. So at some point between '07 and 2017, budget
9 dropped for law enforcement?
10 A. Well, I don't know if the budget dropped.
11 That's -- I mean, I'm not saying your information
12 isn't accurate, but there's more to it than that.
13 There might have been less deputies there, but there
14 might have been more civilians there to handle certain
15 of the traffic positions or posts that civilians are
16 able to handle. It's often said, PSA, police service
17 aide, community service aide, can actually do 65
18 percent of what a police officer could do for about --
19 or do 75 percent of what a police officer could do for
20 60 percent of the salary.
21 So 2007 pre-dated me. I didn't become the
22 sheriff until 2013. I don't know what contract -- I
23 don't know the date of the last contract with BCAD
24 and, you know, if I signed it or not, but I can tell
25 you that just because there were less police out there

FOR THE RECORD REPORTING TALLAHASSEE FLORIDA 850.222.5491

1 or less deputies out there doesn't mean it was unsafe.⁴⁴⁰

2 There could have been more civilians doing
3 non-life-threatening, you know, jobs.

4 Q. But I'll go back to this though. At a bare
5 minimum, if you believed that it was ill-advised to
6 have a minimum number of deputies there, you would
7 have made it known?

8 A. Let me answer it this way: The airport was
9 accurately staffed the day of the shooting. We had
10 the necessary assets and resources there. I don't
11 know what your contracts tell you, but the right
12 amount of people were there. The airport was as safe
13 as -- I wish I could go back in time and not have
14 that -- you know, the killer fly down on that plane.
15 But a killer entered a plane in Anchorage, Alaska,
16 flew to Minnesota, retrieved his baggage at a terminal
17 legally, loaded his gun, and killed five people and
18 shot six more. I ask you what could any Broward
19 sheriff deputy --

20 MR. MACIVER: Mr. Special Master, this is
21 nonresponsive to Mr. Primrose's question.

22 SPECIAL MASTER: Please proceed to answer the
23 question that was asked, if you would.

24 BY MR. PRIMROSE:

25 Q. Let me go to this. You mentioned after every

FOR THE RECORD REPORTING TALLAHASSEE FLORIDA 850.222.5491

1 major law enforcement event, you and a small group of⁴⁴¹
2 command staff grouped together, read whatever
3 information you could, and kind of discussed what
4 happened, what could we maybe learn from this, right?

5 A. Yes.

6 Q. And so we know that in 2013, the LAX shooting
7 happened?

8 A. Two thousand what?

9 Q. 2012 or '13?

10 A. I thought it was '12, I'm not sure.

11 Q. Yeah, I think you're right, 2012. But you
12 would have -- at that point, you weren't sheriff, but
13 an event like that, an airport shooting or school
14 shooting or any major event that was probably
15 reported, you would get together and try to learn as
16 much as you can and take some lessons away?

17 A. Absolutely.

18 Q. Okay. Now, you discussed on direct
19 examination about the oper- -- the training exercise
20 that I believe was called Operation Vigilant Port?

21 A. Yes.

22 Q. And that happened in 2015, that exercise,
23 right?

24 A. Yes.

25 Q. Let me make sure that I understand this

FOR THE RECORD REPORTING TALLAHASSEE FLORIDA 850.222.5491

1 right. The training started as an exercise where⁴⁴²
2 terrorists took over a seaport terminal?

3 A. Yes.

4 Q. It involved a SWAT and hostage negotiators,
5 fire rescue, everybody that might respond?

6 A. Yes.

7 Q. And eventually it transitioned, I think -- I
8 believe he's a major, Major Grant?

9 A. Yes, retired.

10 Q. Retired. Said it was like a twenty -- it was
11 from the show 24, the terrorism moved from the cruise
12 terminal to the airport?

13 A. Yes.

14 Q. And he testified that the intell they got was
15 the terrorists were trying to hijack an actual
16 airplane?

17 A. Correct.

18 Q. Believe he said that BCAD has a
19 decommissioned FedEx cargo carrier that was utilized
20 in the exercise?

21 A. Yes.

22 Q. A car had driven through the fence line, onto
23 the tarmac, and taken over a plane?

24 A. Yes.

25 Q. Never had to go into the terminals, the

FOR THE RECORD REPORTING TALLAHASSEE FLORIDA 850.222.5491

1 airport terminals? Exercise didn't include the⁴⁴³
2 airport terminals, did it?

3 A. Not to my knowledge.

4 Q. Okay. And do you know if any airport -- any
5 of the deputies that were assigned to the airport
6 actually took place in the -- the part of the exercise
7 that include going onto the tarmac, onto the plane?

8 A. See, I think what you're not understanding is
9 maybe the exercise didn't include the airport
10 terminal, but it did include Publix and it did include
11 the library. It's teaching deputies the concept of
12 how to act to an active killer. It's not specifically
13 about the location. It's about teaching them
14 movements and teaching them how to understand their
15 policies and move forward. There were more places --
16 it wasn't about the beach, it wasn't about the 7-11.
17 It was about teaching deputies how to react during
18 these circumstances. You're not going to be able to
19 train at every venue, sir.

20 Q. Let me ask you this, though: Was that
21 exercise, Operation Vigilant Port, designed to test
22 how BSO and BCAD would deal with evacuating an entire
23 airport terminal, the passengers, the airline
24 employees, or the employees of the airport?

25 A. You'd have to ask Major Grant that. I --

FOR THE RECORD REPORTING TALLAHASSEE FLORIDA 850.222.5491

1 Q. You don't know one -- 444
2 A. I was there, but I don't know what the --
3 what the methodology was.
4 Q. Okay. And did I hear correctly on direct
5 examination this morning, I believe you said this,
6 that you were aware of what it takes to stop air
7 traffic at an airport?
8 A. I wasn't aware. I learned that.
9 Q. Okay. So leading up to the Fort Lauderdale
10 airport shooting, you as the sheriff providing law
11 enforcement to the airport, had no idea what it would
12 take to shut down the entire air traffic in the event
13 that there was a large-scale, mass casualty event?
14 A. Is your question -- I want to make sure I
15 understand. Is your question as a sheriff, would I
16 know the protocols of the airport and what the airport
17 director needed to shut down an airport?
18 Q. Yes.
19 A. I would not have any knowledge of that, no,
20 of course not.
21 Q. Would you have any knowledge of how your
22 agency would interact with the airport district in the
23 event of a large-scale active shooter situation within
24 the airport?
25 A. Of course, I would. We would be -- we would

FOR THE RECORD REPORTING TALLAHASSEE FLORIDA 850.222.5491

1 said yesterday, when I found out that other people 446
2 were calling in and we were getting calls of gunshot
3 victim, woman down, I thought -- logically so, I
4 thought that this could be a systematic terrorist
5 attack where they're going to attack different
6 terminals. So I decided to -- having read about 9/11
7 more times than I wish I did, I thought this could be
8 a multi-faceted attack like the Pentagon,
9 Pennsylvania, the twin towers, and I thought that we
10 needed to shut down the airport because we were
11 getting calls of active killing, and I wasn't going to
12 let the airport director continue to have normal
13 operations. So we had a discussion. I told him that
14 I thought he needed to shut down the airport. He
15 agreed with me, he did it, and he shut down the
16 airport and we worked together seamlessly. It was
17 just a -- it was just a normal discussion between
18 leaders.
19 Q. Okay. Now, after the entire incident was
20 over, I don't know if it was the next day or
21 thereafter, but your agency had a policy we need to
22 conduct an after-action report into what happened and
23 create lessons learned?
24 A. There was no policy, we don't -- to my
25 knowledge, there's no policy to do an after-action

FOR THE RECORD REPORTING TALLAHASSEE FLORIDA 850.222.5491

1 do what the airport needed. We don't -- we're an 445
2 agency that when it's our -- when we're in control and
3 we're in command and we are in charge of a situation,
4 that we would expect other agencies to assist us. And
5 if the airport needed to shut down their airport,
6 whether it was life-threatening or maybe it was an
7 issue, anyway we can help out, we would help out.
8 So, you know, you don't need to -- if a
9 family member needs knee surgery, you don't need to
10 know how to do the knee surgery, just know how to take
11 them to an orthopedic surgeon who can do it. So as
12 long as I know what the -- as long as the airport
13 manager knows what to do and he knows that he can
14 count on me and BSO, we're good.
15 Q. But wasn't there a conflict, though? The
16 testimony I remember was you told BCAD "You need to
17 shut down -- shut down this airport."
18 A. There wasn't a conflict. There was -- we
19 were both experiencing an airport shooting for the
20 first time. It was a horrific incident, and it was
21 what two leaders -- it was a fervent discussion that
22 two leaders would have. The airport director, his
23 mission and scope was to keep the airport open for
24 commerce and do the things he needed to do, rightfully
25 so. And I was supporting that endeavor. But as I

FOR THE RECORD REPORTING TALLAHASSEE FLORIDA 850.222.5491

1 report. It was -- command staff came to me and they 447
2 said they felt that we should enter into the exercise
3 of doing an after-action report, was the logical way
4 to approach it. I knew there were lessons to be
5 learned from us and others, and I approved the -- the
6 compilation of that report.
7 Q. Okay. So -- and you understand that Major
8 Angelo Cedeno was chosen to be the lead author or
9 the -- the leader of this effort to do an after-action
10 report?
11 A. No, that's incorrect. He was chosen to be a
12 gatherer of facts. I hope I didn't, you know,
13 trivialize my analogy yesterday, but he was basically
14 sent out to buy the ingredients. There were many,
15 many other chefs and cooks who were going to put that
16 final report together. He was just gathering the
17 facts.
18 Q. Okay. He was selected to gather facts and he
19 was assisted by an Executive Lieutenant Furman, right?
20 A. He was an executive lieutenant --
21 Q. Do you know if he was credited as being a
22 contributing author?
23 A. I don't know that.
24 Q. Okay. And what about the inclusion of Deputy
25 Vincent Torres as a research, intelligence, and

FOR THE RECORD REPORTING TALLAHASSEE FLORIDA 850.222.5491

1 coordination contributor? 448
2 A. Don't know that.
3 Q. Okay. I don't think that this is what you
4 meant, but I want to give you the opportunity to tell
5 me if -- what you actually meant. Major Cedeno was
6 not some first-year, low-level road cop, was he?
7 A. Not at all.
8 Q. In fact, when Major Cedeno was chosen to go
9 out and get the ingredients, as you say, he was
10 actually a major within Broward Sheriff's Office?
11 A. Yes. If I said anything to trivialize his
12 importance, thank you for correcting that on the
13 record because, no, he was a quality leader who was
14 given that assignment.
15 Q. Yeah, and I've got bio here, and it says he
16 had been with Broward Sheriff's Office since 1989. Do
17 you have any reason to disagree with that?
18 A. No reason to disagree with that.
19 Q. And he's held everything from a deputy
20 sheriff in the Department of Detention, Central
21 Booking, through sergeant of a road patrol division,
22 auto theft task force. He was then the lieutenant of
23 the City of Pompano Beach district, an executive
24 lieutenant, a captain, and then now -- now a major.
25 That is a significant promotion within the ranks of

FOR THE RECORD REPORTING TALLAHASSEE FLORIDA 850.222.5491

1 there, this is more than just, again, some newer law 450
2 enforcement officer just going out and doing
3 interviews or pulling documents or reviewing footage,
4 this is a guy who has spent 25 to 30 years in law
5 enforcement and knows what he's looking for, right,
6 knows to spot out good and bad?
7 A. Major Cedeno went out there, I'm proud of the
8 rank he established and I'm proud of him as an
9 individual, but nothing changes with my answer. He
10 went out there to look for facts, opinions, and
11 nothing changes with my answer. He just went out
12 there to find the ingredients. He was only one
13 person, and a plethora of people were going to review
14 the report.
15 Q. Let me ask the question this way: You don't
16 necessarily discount the opinions that Major Cedeno
17 put in his report, do you?
18 A. Absolutely not.
19 Q. They are valid opinions of Major Cedeno based
20 on his 30-plus years of experience in law enforcement
21 and a major over professional -- the Department of
22 Professional Standards?
23 A. As I like to say, everybody's entitled to
24 their own opinion, but nobody's entitled to their own
25 set of facts, so he went out and gathered facts,

FOR THE RECORD REPORTING TALLAHASSEE FLORIDA 850.222.5491

1 the sheriff's office, right? 449
2 A. I would say so.
3 Q. Okay. And my understanding is that when he
4 drafted -- or when he was asked to -- when he was
5 asked to go gather the ingredients, he was the major
6 over the Department of Professional Standards,
7 Division of Internal Affairs, Public Corruption and
8 Internal Audit?
9 A. I think that's correct.
10 Q. That a pretty high-level position, right?
11 A. I think so.
12 Q. Would that be considered command staff?
13 A. Yes.
14 Q. Okay. And as part of that, he would have
15 actually conducted managerial duties as part of that
16 role?
17 A. Yes.
18 Q. He would have been in charge of analyzing how
19 his subordinates are doing in their jobs?
20 A. Yes.
21 Q. He would be able to pinpoint if there were
22 deficiencies in the individuals that he had working
23 within his department?
24 A. Yes.
25 Q. Okay. And so when Major Cedeno is going out

FOR THE RECORD REPORTING TALLAHASSEE FLORIDA 850.222.5491

1 opinions, and certainly a lot of other people -- it 451
2 was -- to get an accurate document, it was necessary
3 that many people weigh in on it.
4 Q. Okay. And Major Cedeno, along with Executive
5 Lieutenant Furman and Deputy Torres, they were doing
6 just that, they were going out and gathering facts,
7 right?
8 A. I don't know what they were doing. They
9 were -- I can't testify as to what Furman and Torres
10 were doing.
11 Q. Did any of your command staff, after
12 authorizing Major Cedeno to go do this, tell you,
13 "Hey, as an update, here's who he's going to talk to,
14 here's" --
15 A. No.
16 Q. -- "any meetings he's having"?
17 A. No.
18 Q. Okay. So want to show you -- this is
19 Governor's Exhibit C, and this is the first draft that
20 was issued by Major Cedeno. And Major Cedeno in --
21 and this is on EOG Bates stamp 63 -- puts a section
22 called "Meetings, Debriefs, Summits, and Proposals,"
23 and he goes through everything that they did in
24 preparation for this. January 20th, he meets with BSO
25 airport district command, and they discuss a whole

FOR THE RECORD REPORTING TALLAHASSEE FLORIDA 850.222.5491

1 plethora of topic areas, right? 452
2 A. Right.
3 Q. Topic areas related to staffing, terminal,
4 personnel assignments, current initiatives, trends,
5 stats, airport extension -- or expansion, excuse me,
6 and all the stakeholders, right?
7 A. Right.
8 Q. And a few weeks later, Major Cedeno on
9 February 15th and Colonel Polan meet with airport
10 command captain to discuss a review of the timeline of
11 events, look at video surveillance, right?
12 A. Right.
13 Q. Two days later, February 17th, Major Cedeno
14 meets with Fort Lauderdale PD and fire rescue
15 emergency management to discuss their interaction
16 during the events?
17 A. Correct.
18 Q. March 1st, Major Cedeno chairs a formal BSO
19 debrief on the active shooter situation, including
20 agency department heads that played a role in it,
21 right?
22 A. Right.
23 Q. So he's got BSO -- what I'm going to call
24 senior staff from different agencies. He's got
25 airport district, criminal investigations, SWAT, CSU,

FOR THE RECORD REPORTING TALLAHASSEE FLORIDA 850.222.5491

1 knew this wasn't even anywhere near the final 454
2 document. It's just a simple draft.
3 Q. Completely understand it's a draft, but the
4 draft -- let me ask it this way: You're in no way
5 saying that Major Cedeno put things into a draft that
6 were -- that were patently false?
7 A. No.
8 Q. So if Major Cedeno puts that on March 1st,
9 2017, he meets with all of these senior staff at
10 different agency departments and they discuss their
11 observations, recommendations, strengths and area of
12 improvement, you don't have any reason to believe that
13 that did not happen?
14 A. I have no reason to believe that, no.
15 Q. Okay. Keep going, March 10th, Major Cedeno
16 and Colonel Polan meet again with BCAD to discuss
17 their areas of concern, conversations, some proposals,
18 and then as I've highlighted, in Major Cedeno's
19 opinion, part of this meeting was that a tac- -- "The
20 tactical posture of the Fort Lauderdale airport was
21 deficient and several years behind local surrounding
22 airports and national/international airports in the
23 areas of tactical presence and response, training and
24 counter-terrorism strategies."
25 Now, do you agree with that statement, the

FOR THE RECORD REPORTING TALLAHASSEE FLORIDA 850.222.5491

1 crime scene unit, investigations, COMS (phonetic), 453
2 fire rescue, Department of Law Enforcement, he has all
3 of those folks in a debrief on March 1st, right?
4 A. Yes.
5 Q. And it even says, if you go further, that
6 those individuals were able to speak at the debrief
7 about their experiences and observations, right?
8 A. Right.
9 Q. It says there that they were able to discuss
10 recommendations and perceive strengths and areas of
11 improvement?
12 A. I just want to ask you a question for
13 clarification. The document that you're showing me,
14 it has the word "draft" going across it. Is that
15 something that Major Cedeno had on it when you got
16 this document? Did it have the word "draft" across
17 it?
18 Q. This document, the only way that it has been
19 altered, sir, is the highlights that I put on it.
20 A. Okay. So, then, as you can see as you show
21 me that document, even Major Cedeno knew when he wrote
22 it, he has the word "draft" on it. So it wasn't
23 written with any finality. He knew he could write
24 whatever he wanted and put in whatever we needed to
25 read, because in his mind, he knew it was a draft, he

FOR THE RECORD REPORTING TALLAHASSEE FLORIDA 850.222.5491

1 highlighted one I just read? 455
2 A. Can you read it again, please?
3 Q. You want me to read it out loud?
4 A. If you can.
5 Q. So the highlighted portion there at the
6 bottom, this is what Major Cedeno puts as an
7 observation from the March 10th, 2017, meeting Major
8 Cedeno and Colonel Polan had with the BCAD division
9 director, Mark Gale, and he wrote: "The tactical
10 posture of the" -- and I'm going to say it the way
11 that it's written -- "FLL airport is deficient and
12 several years behind local surrounding airports and
13 national/international airports in the areas of
14 tactical presence and response, training, and
15 counter-terrorism strategies."
16 Do you disagree with that statement?
17 A. I might. I mean, I don't know enough about
18 it to agree or disagree. I don't know -- I would ask
19 Major Cedeno what other airports you spoke to. Is
20 this just one person who said it -- you know, opinion?
21 Is this something you can document? You know, you
22 need more than a statement. What other airport
23 directors were spoken to? What other tactical units
24 were spoken to? So I don't know where he developed
25 that information, and that's why these are drafts and

FOR THE RECORD REPORTING TALLAHASSEE FLORIDA 850.222.5491

1 not final products. 456
2 Q. But, again, as you've already said, you don't
3 believe that Major Cedeno put anything in the report
4 that would be patently false?
5 A. No, but I don't -- I can't say without -- you
6 know, with certainty that his observations were
7 correct or myself or command staff would have the same
8 observations or come to the same opinions. He was a
9 highly decorated and important member of command
10 staff, but he was one of 30 members, and 30 other
11 people were going to weigh in on it. So to say what
12 he said is the actual way, you know, I mean, he put
13 down this about the airport, but we would have to talk
14 to, you know, other airports and where did he get that
15 information from. I would have a lot more questions.
16 Q. Okay. So March 15th, now Major Cedeno and
17 Furman go to Miami-Dade airport district and meet with
18 a major there, and it says that they actually saw a
19 physical exercise presentation that included some
20 discussion about outline missions, standards of
21 operation, and criteria for deployment. So at least
22 there, it looks like Major Cedeno went to another
23 airport district and saw maybe how they were doing
24 things?
25 A. Correct.

FOR THE RECORD REPORTING TALLAHASSEE FLORIDA 850.222.5491

1 exercises, policy revisions. Those are conversations 458
2 that he was trusted to have with a member of Congress
3 about the lessons learned from the Fort Lauderdale
4 airport shooting?
5 A. Correct.
6 Q. Okay. And we go -- and a couple weeks later,
7 he's now flying to New York City to -- to have a
8 discussion with Port Authority of New York and New
9 Jersey Police Department about addressing terrorist
10 threats and experiences that they've learned on
11 attacks at airports?
12 A. Correct.
13 Q. So, again, I mean, he's trusted to be an
14 outward-facing person for Broward Sheriff's Office on
15 the information he's gathered and the opinions he has
16 about what we need to learn from this incident?
17 A. I don't dispute that.
18 Q. Okay. And we know that sometime in April,
19 Major Cedeno did another briefing with BSO senior
20 staff. I believe -- let's see. I believe we've got
21 right here on April 10th, it says he met with a formal
22 meeting at BSO headquarter with all incident
23 management, and then April 12, 2017, a formal debrief
24 with BCAD on it as well. So we've got a timeline of
25 all the different events that Major Cedeno -- all the

FOR THE RECORD REPORTING TALLAHASSEE FLORIDA 850.222.5491

1 Q. Okay. Two weeks later, it says Major Cedeno, 457
2 along with Colonel Polan and a captain, actually
3 attended a round table with Congressman Debbie
4 Wasserman Shults, right?
5 A. Yes.
6 Q. So at least there was an understanding within
7 BSO that the person told to go gather the ingredients
8 was being trusted enough to have formal discussions
9 with members of Congress about what he was learning
10 and what they were seeing in the lessons learned?
11 A. That's exactly what -- you know, what we
12 wanted. That's what an after-action report does, it
13 sends you to places where you can tell others what you
14 did right and what you did wrong, and the goal is
15 lessons learned, areas of improvement, and how can we
16 get better, and that's what he was out there doing,
17 trying to find out how we can get better.
18 Q. So are you suggesting that the formal round
19 table he had with Congressman Debbie Wasserman Shults
20 was so that he could learn ways to do it better?
21 A. No, I'm sure it was probably a debriefing
22 from him to her about what we've learned so far.
23 Q. Okay. And it says in there, at least what
24 Major Cedeno writes, is that they actually discussed
25 mass evacuations, planning, gaps in security, training

FOR THE RECORD REPORTING TALLAHASSEE FLORIDA 850.222.5491

1 meetings he had, round tables, and discussions prior 459
2 to the releasing of his first draft?
3 A. I'll agree with you, we have a timeline.
4 Q. Okay. So we know based on this report that
5 the draft was completed on or about May 3rd of 2017,
6 but if I understood you correctly, you actually never
7 read the first draft?
8 A. I did not.
9 Q. So you had no idea what actual observations
10 or recommendations were made from the individual
11 chosen to go gather the ingredients and write them
12 down?
13 A. I don't know if -- I don't remember, I can't
14 recall now if I had discussions with other members of
15 command staff about some of his take-aways, but I --
16 I'm just telling you I didn't read the draft at that
17 point.
18 Q. Okay. You do know that at some point,
19 somebody within -- a senior staff at BSO wanted
20 another review of the first draft?
21 A. Say that again.
22 Q. Somebody within BSO --
23 A. Who?
24 Q. No, no, that's my point. Somebody higher
25 than Major Cedeno wanted his -- Major Cedeno's draft

FOR THE RECORD REPORTING TALLAHASSEE FLORIDA 850.222.5491

1 to be looked at, a second set of eyes, another round 460
2 of revisions, right?
3 A. Is that a question?
4 Q. Yes. That's your understanding?
5 A. No, that's not my understanding. Who --
6 Q. You don't --
7 A. Who are you telling me would have asked for
8 that request? I'm not sure I'm following you.
9 Q. So you know -- you know Captain Diefenbacher?
10 A. Yes.
11 Q. And I believe you testified you read his
12 deposition --
13 A. Yes.
14 Q. -- right?
15 And you saw where Captain Diefenbacher said
16 either Colonel Polan or an assistant general counsel
17 asked him to look at Major Cedeno's report?
18 A. I thought that eventually came from the
19 undersheriff, but I would agree with you.
20 Q. Okay. And that's my point. Somebody else
21 looked or found Captain Diefenbacher and said, "you're
22 trusted, you're an attorney. We want you to take a
23 look at Major Cedeno's report?"
24 A. No. It wouldn't have been that way, take a
25 look at major's report. There would have been a

FOR THE RECORD REPORTING TALLAHASSEE FLORIDA 850.222.5491

1 report before? I mean, do you know how it goes? 462
2 Because it's going to be a document that you want to
3 make sure is as good as it could be to teach and to
4 learn and what not to do, what we did wrong, and what
5 we did right. And we're not ashamed to put areas of
6 improvement in. I've never been on any operation yet
7 that's been perfect. Even our Safe SWAT operations,
8 nobody goes home until we go in the room and we
9 debrief. We go into the SWAT locker room and we
10 debrief, did it go good. Even if -- some briefings
11 last five minutes, some 50 minutes, but it was just
12 a -- a next step, sir.
13 Q. Okay. If Captain Diefenbacher testified that
14 he was asked to look at it because there were some
15 grammatical issues and, in his words, the report was
16 too emotional and non-pragmatic, you wouldn't disagree
17 that that's what he said?
18 A. If Captain Diefenbacher testified to
19 something, I wouldn't disagree with it, no.
20 Q. Okay. Now, you never looked at Captain
21 Diefenbacher's draft, what we'll call the second draft
22 of the report?
23 A. No.
24 Q. So you don't know if there were some areas of
25 improvement that he kept from Major Cedeno's version?

FOR THE RECORD REPORTING TALLAHASSEE FLORIDA 850.222.5491

1 logical next step. It would have just been the second 461
2 step in the progression of doing an after-action
3 report. It wouldn't have been "We want you to take a
4 look at Major Cedeno's," it would have been
5 preplanned. Major Cedeno is going to do the initial
6 work, he's going to do the work-up, and then it's
7 going to go to -- the etymology of it is that it's
8 going to go to a round table or one other person or
9 two other people, and eventually it's going to work
10 its way up to a final product that I'm going to review
11 before it gets published.
12 Q. Well, you remember reading in Captain
13 Diefenbacher's testimony where he said he was
14 approached by -- and I think you might be right --
15 Undersheriff Kinsey?
16 A. That's -- I think so.
17 Q. Or an assistant general counsel to look at
18 the report because there was a public records request
19 from I believe *The Sun Sentinel* asking for the report?
20 A. Yeah, I remember the public records request
21 coming in clearly and I remember being briefed on
22 that. But like I said, it wouldn't be to over -- you
23 know, to review and grade Major Cedeno's work. It
24 would have been a logical next step.
25 Have you ever been part of an after-action

FOR THE RECORD REPORTING TALLAHASSEE FLORIDA 850.222.5491

1 A. I just told you I didn't look at it. 463
2 Q. Okay. And I'm not going to go through all of
3 these with you, but you would agree with me that you
4 have no idea if there were areas of improvement that
5 both Major Cedeno and Captain Diefenbacher believed
6 should be in the report that were ultimately cut out
7 of the final critical incident report that you signed
8 off on?
9 A. That would have been at the level of
10 lieutenant colonels, colonels, and undersheriff to
11 decide, and I wouldn't have been involved in that. I
12 would have been involved at -- when I should have
13 been, at the very -- before the final product was
14 released and I had a chance to weigh in on it.
15 Q. Well, you keep saying "when I should have
16 been involved," but don't you want to know what the --
17 the major who's been over professional standards and a
18 captain who had legal experience, and you testified
19 this morning he was an amazing leader, had long
20 experience, don't you want to know what those two
21 individuals say are areas of improvement to them?
22 A. I want to know everything. I want to know
23 the reports that Treijs -- I want to know what he did.
24 I'd like to know about the 750,000 reports that come
25 in. You have -- you work with an agency with almost

FOR THE RECORD REPORTING TALLAHASSEE FLORIDA 850.222.5491

1 6,000 people and you work and serve a community of two⁴⁶⁴
2 million, you can't know everything and you can't want
3 to know everything, because then you get caught up in
4 not -- in not doing the things that you need to do.
5 The men and women I put in place as colonels, majors,
6 captains, and lieutenant colonels, they know at what
7 point they need to sit down and address issues with
8 me. So I hope I answered your question.
9 Q. But, see, that's where I've got a concern
10 now, because this airport shooting was a big deal,
11 right?
12 A. Right.
13 Q. This is not a -- a traffic stop that went
14 wrong, it's not a -- it's not a robbery. This is a
15 mass casualty event at one of the fastest-growing
16 airports in the country, and you're saying you just
17 relied on what your undersheriff was telling you this
18 is what should be important to you?
19 A. No, I relied on a command staff, starting
20 with Major Cedeno gathering facts, gathering
21 opinions --
22 Q. But if you rely on Major Cedeno --
23 MR. KUEHNE: Objection; cut off the witness
24 during a responsive answer.
25 SPECIAL MASTER: Please let him finish, but

FOR THE RECORD REPORTING TALLAHASSEE FLORIDA 850.222.5491

1 to believe that there was a fourth, fifth, sixth, and⁴⁶⁶
2 seventh versions --
3 A. No.
4 Q. -- of this?
5 A. No.
6 Q. Okay. So we're not talking about thousands
7 of drafts that you would have to look at to determine
8 the full scope of what happened and what were areas of
9 concern to Major Cedeno and Captain Diefenbacher,
10 right?
11 A. What's your question?
12 Q. Well, my question is you're saying there's
13 all of these calls that come in, but there was one
14 Fort Lauderdale airport shooting, there were two draft
15 versions and one critical incident report. These are
16 not thousands of pages of documents that you couldn't
17 read through the two draft versions to say "Let me see
18 what the other -- the front-line person who did this
19 said and let me compare it to what Undersheriff Kinsey
20 is telling me should go in the final report"?
21 A. I read the final product and -- I don't know
22 what -- I read the final product.
23 Q. Okay. And because you read the final
24 product, you did not know at that time that Major
25 Cedeno and Captain Diefenbacher included this area of

FOR THE RECORD REPORTING TALLAHASSEE FLORIDA 850.222.5491

1 try to be brief in the answer. Please continue. ⁴⁶⁵
2 THE WITNESS: Yes, sir.
3 As we -- as was testified this morning, I
4 think the report took 10 months to complete. I
5 didn't rely on the undersheriff. I relied on
6 everybody to be doing their jobs. And if you
7 read -- and I did, I'm sure you did too -- the
8 final product, the final product was excellent.
9 It talked about the positives and the things --
10 the areas for improvement, and I think that's what
11 an after-action report should do and did do. So I
12 was really proud of the way the agency came
13 together to develop that product.
14 BY MR. PRIMROSE:
15 Q. Do you believe that there are more than three
16 drafts of the report done on Fort Lauderdale airport
17 shooting?
18 A. I don't know how many drafts there were.
19 Q. If I told you that through requesting
20 these -- of all drafts through Sunshine, was given one
21 draft dated May 3rd, 2017, Major Cedeno's, another
22 draft dated June 2nd, 2017, Captain Diefenbacher's,
23 and then the critical incident report that I believe
24 was issued October 6 of 2017 as the full universe of
25 drafts that existed of this, you don't have any reason

FOR THE RECORD REPORTING TALLAHASSEE FLORIDA 850.222.5491

1 improvement listed at EOG 00070 about an area of ⁴⁶⁷
2 enhanced active shooter training lesson plans and the
3 implementation of an active shooter vetting process,
4 or the second one about enhanced training specific to
5 the BSO airport district and partner agency personnel?
6 A. I did know about that, not through the rough
7 draft, but I had conversations with the undersheriff
8 about those issues. So just because I didn't read the
9 rough draft doesn't mean the undersheriff or Colonel
10 Polan wouldn't have taken aspects out of the rough
11 draft or facts that they learned and told me about
12 what -- you know, what they thought we needed to do to
13 be a safer agency. So that's not necessarily true.
14 Q. Okay. Did the undersheriff also tell you
15 about Major Cedeno's highlighting of a concern about
16 complacency with the BSO district staff?
17 A. I don't remember.
18 Q. This one right here on Bates stamp EOG 00070,
19 "Area of Improvement 3: BOS district personnel,
20 though many are tenured, must avoid complacency based
21 on their environment and a perceived sense of
22 security. BSO deputies assigned to the airport
23 district can mistake the assignment as a lessened
24 exposure to harm or perceived retirement when the
25 contrary is highly needed to vigilantly address and

FOR THE RECORD REPORTING TALLAHASSEE FLORIDA 850.222.5491

1 deter active shooter and bombing si- -- events. 468
2 Historically it has been an accepted practice, but
3 times have changed immensely, requiring a global view
4 to assigned personnel."
5 Did Undersheriff Kinsey tell you about that
6 area of improvement?
7 A. No, but just reading it now, that just seems
8 like the opinion -- that would be Major Cedeno's
9 opinion. I would doubt seriously he would have went
10 to the airport or served any time out there and been
11 able to make these evaluations at that time.
12 Q. Okay. So this is one area of improvement
13 that you believe Major Cedeno might not have actually
14 gotten the information to come up with this opinion?
15 A. No, I'm not saying that. I'm just saying
16 that was an opinion and -- sounds like an opinion,
17 that's all I'm saying.
18 Q. An opinion of a captain and a major over the
19 Department of Professional Standards wrote that?
20 A. Right. I mean, how he -- I would -- my
21 question to him if he were here is I'd say "How do you
22 know about complacency at the airport, and if there is
23 complacency out there, then, you know, what are the
24 sergeants, what are the lieutenants, what are they
25 doing about that?" So, I mean, it's a --

FOR THE RECORD REPORTING TALLAHASSEE FLORIDA 850.222.5491

1 manage the time. I'm sensitive to the court 470
2 reporter who's been at it for a while now, and I
3 want to schedule a break, but I don't want to --
4 I'd just like some indication of how much longer
5 you think you might be.
6 MR. PRIMROSE: At least an hour.
7 SPECIAL MASTER: Okay. Let's go ahead and
8 take a break now and let's reconvene at 1:15.
9 (Brief recess.)
10 (Proceedings continued in Volume IV.)
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

FOR THE RECORD REPORTING TALLAHASSEE FLORIDA 850.222.5491

1 Q. But again, you didn't know that that was an 469
2 area of concern when Undersheriff Kinsey brought you
3 the final critical incident report, right? Because I
4 can submit to you that that area of concern is
5 completely absent from the critical incident report
6 that was finalized in October.
7 A. I don't remember hearing that, but whether --
8 and I don't know what -- I can't speak for Major
9 Cedeno, but I know -- look, I'm not -- no sheriff, no
10 leader's going to support complacency by their men or
11 women, but whether there was complacency in doing work
12 out at the airport, let's be crystal-clear and fair to
13 our community, that was going to have nothing to do
14 with a man getting off a plane and shooting five
15 people. So to correlate one to the other is grossly
16 unfair to the Broward Sheriff's Office.
17 MR. PRIMROSE: Okay. I'm just going to
18 submit for the record, Special Master, that all
19 three versions are listed as Governor's Exhibits
20 C, D, and E, and we will let them stand for
21 themselves.
22 SPECIAL MASTER: That's fine. Let me -- I
23 hate to interrupt, but let me just -- how much
24 longer do you think you're going to be in the
25 cross examination, Mr. Primrose? I want to try to

FOR THE RECORD REPORTING TALLAHASSEE FLORIDA 850.222.5491

1 CERTIFICATE OF REPORTER 471
2
3
4
5 I, JESSICA RENCHEN, Registered Professional
6 Court Reporter, certify that I was authorized to and
7 did stenographically report the foregoing proceedings
8 and that the transcript is a true and complete record
9 of my stenographic notes.
10
11 DATED this 19th day of June, 2019.
12
13
14
15
16 JESSICA RENCHEN, Court Reporter
17
18
19
20
21
22
23
24
25

FOR THE RECORD REPORTING TALLAHASSEE FLORIDA 850.222.5491

**WORD
INDEX**

#	17th [1] - 452:13	369:23, 439:8, 454:9,	4	A
#3550 [1] - 309:9	180 [1] - 312:24	455:7, 458:23, 459:5,	4 [5] - 406:20,	a.m [3] - 308:12,
	1863 [1] - 380:16	465:21, 465:22,	406:21, 407:11,	311:4, 416:6
	19 [4] - 308:11,	465:24	422:14	ABA [1] - 313:14
	322:22, 322:24, 345:3	2018 [9] - 333:19,	4-hour [4] - 422:1,	ability [5] - 321:14,
	19-14 [2] - 308:3,	348:15, 350:5,	422:5, 422:7, 422:11	336:4, 347:3, 432:22,
	311:6	351:24, 356:7,	4.37 [7] - 335:13,	433:3
'07 [1] - 439:8	1923 [1] - 345:1	365:23, 381:8, 409:19	353:10, 353:22,	able [17] - 311:20,
'12 [1] - 441:10	1968 [1] - 316:19	2019 [5] - 308:11,	362:13, 363:3, 363:9,	312:20, 337:6,
'13 [2] - 408:17,	1989 [1] - 448:16	315:10, 345:2, 345:4,	406:13	342:14, 344:15,
441:9	1999 [6] - 404:10,	471:11	40 [6] - 317:8,	367:13, 373:23,
'15 [1] - 420:13	405:2, 412:9, 412:19,	20th [1] - 451:24	317:14, 349:21,	384:25, 391:21,
'16 [2] - 409:19,	413:12, 413:14	21 [2] - 380:15	388:20, 388:24,	394:14, 396:25,
420:14	19th [2] - 311:4,	2139 [1] - 338:3	424:18	439:16, 443:18,
'17 [1] - 420:14	471:11	22 [3] - 380:14,	404 [1] - 308:13	449:21, 453:6, 453:9,
'18 [1] - 420:14	1:15 [1] - 470:8	380:15, 380:16	471 [2] - 308:8, 310:7	468:11
'99 [1] - 413:19	1st [3] - 452:18,	23 [2] - 380:15,		absent [1] - 469:5
	453:3, 454:8	380:17		absolute [2] -
0		24 [2] - 344:25,	5	332:17, 384:11
00070 [2] - 467:1,	2	442:11	5 [2] - 318:24, 367:16	Absolutely [15] -
467:18	2 [8] - 422:13,	25 [2] - 381:8, 450:4	5,000 [1] - 380:5	320:14, 325:24,
1	426:14, 426:18,	2849 [1] - 350:3	50 [2] - 424:15,	326:2, 335:18, 349:1,
1 [10] - 319:2,	426:22, 427:12,	29 [1] - 338:3	462:11	352:11, 358:1,
353:14, 353:15,	428:7, 429:1, 429:3	2:00 [1] - 416:8	561-296-7900 [1] -	358:14, 358:16,
363:9, 422:12, 426:7,	20 [6] - 344:5, 365:3,	2d [1] - 309:9	309:13	363:12, 366:4, 384:8,
426:8, 426:11, 428:4,	412:24, 413:24,	2nd [1] - 465:22		429:6, 441:17, 450:18
428:5	423:23, 424:12		6	absolutely [6] -
1,800 [2] - 369:3,	20,000 [1] - 333:6	3 [3] - 422:13,	6 [3] - 328:21,	363:14, 390:23,
398:20	200 [3] - 312:25,	428:11, 467:19	328:22, 465:24	406:10, 408:6,
10 [3] - 385:7,	337:25	30 [10] - 315:6,	6,000 [2] - 369:2,	413:25, 414:1
438:19, 465:4	2001 [1] - 405:3	349:20, 368:19,	464:1	academy [8] -
10-minute [2] -	2007 [2] - 439:4,	369:5, 369:22,	60 [1] - 439:20	391:14, 391:20,
385:5, 425:8	439:21	392:18, 413:24,	63 [1] - 451:21	392:2, 392:9, 392:17,
10-month [1] - 328:1	2012 [4] - 336:15,	450:4, 456:10	65 [1] - 439:17	392:23
100 [3] - 309:9,	413:20, 441:9, 441:11	30-plus [1] - 450:20		accepted [4] - 363:4,
432:20, 438:21	2013 [17] - 319:2,	30.07 [1] - 402:7	7	363:10, 374:11, 468:2
10th [3] - 454:15,	336:18, 336:20,	30.15 [2] - 399:12,	7 [1] - 330:9	access [4] - 343:17,
455:7, 458:21	336:23, 351:24,	400:9	7-11 [1] - 443:16	344:22, 345:7, 403:19
11 [2] - 382:8, 405:1	406:21, 407:11,	300 [1] - 337:25	72 [1] - 433:25	accessible [1] -
110 [1] - 308:12	414:9, 416:20,	305-789-5989 [1] -	75 [1] - 439:19	411:13
11:00 [3] - 361:13,	417:10, 417:14,	309:10	750,000 [2] - 370:3,	accessing [1] -
385:8, 416:8	419:9, 420:13,	308 [1] - 308:8	463:24	364:8
12 [3] - 331:22,	420:20, 421:3,	31 [2] - 350:1, 350:2		accomplish [2] -
431:18, 458:23	439:22, 441:6	318 [1] - 310:4	8	339:1, 345:24
122 [1] - 439:1	2014 [8] - 417:7,	32308 [1] - 308:24	8 [1] - 345:2	accomplished [2] -
12:40 [1] - 308:12	417:8, 417:11,	32399 [2] - 308:13,		311:20, 327:12
14 [3] - 333:19,	417:18, 417:21,	309:5	9	accreditation [1] -
348:15, 365:23	417:23, 419:24,	33131-2154 [1] -	9/11 [1] - 446:6	404:24
140 [1] - 308:23	420:13	309:9	90 [3] - 392:22,	Accreditation [1] -
14th [1] - 356:7	2015 [3] - 419:25,	33410-2809 [1] -	425:5, 425:11	405:3
150 [3] - 309:12,	420:4, 441:22	309:13	90-minute [1] -	accreditations [4] -
438:20, 439:5	2016 [10] - 356:5,	3399 [1] - 309:12	324:14	404:14, 404:17,
1500 [1] - 308:23	356:7, 356:16,	385 [1] - 310:5	911 [1] - 321:2	404:21, 405:4
15th [2] - 452:9,	367:16, 408:18,	3rd [2] - 459:5,	9:00 [3] - 308:12,	accredited [3] -
456:16	408:24, 409:25,	465:21	311:3, 416:6	404:5, 404:10, 405:2
17 [1] - 322:23	410:8, 420:4, 421:22			accredits [1] -
1771 [1] - 380:17	2017 [14] - 327:24,			403:25
1776 [1] - 380:17	327:25, 328:22,			accurate [9] - 323:3,
	368:19, 369:5,			330:20, 332:12,

- 338:4, 382:7, 402:14,
420:18, 439:12, 451:2
accurately [1] -
440:9
accusation [1] -
316:11
accusatory [1] -
365:21
accused [2] - 323:1,
366:25
acknowledges [1] -
330:11
act [3] - 363:10,
402:21, 443:12
acting [3] - 346:5,
386:4, 402:3
action [10] - 321:10,
357:24, 446:22,
446:25, 447:3, 447:9,
457:12, 461:2,
461:25, 465:11
Active [2] - 422:6,
423:8
active [61] - 321:18,
335:2, 335:6, 335:10,
335:12, 337:5,
337:16, 338:5,
339:12, 340:10,
341:4, 349:3, 351:12,
351:22, 353:10,
355:6, 356:2, 356:3,
357:24, 358:8,
359:11, 359:16,
359:17, 359:18,
360:9, 360:15,
360:16, 362:8,
388:17, 398:18,
399:7, 405:21,
406:13, 406:17,
410:21, 411:5,
411:19, 417:3, 417:9,
417:15, 418:6,
418:14, 420:2,
420:16, 421:7,
421:22, 422:20,
423:5, 425:14,
430:19, 430:24,
431:1, 433:21,
443:12, 444:23,
446:11, 452:19,
467:2, 467:3, 468:1
actively [2] - 378:25,
397:11
activity [1] - 366:1
acts [1] - 319:3
actual [4] - 313:3,
442:15, 456:12, 459:9
adage [1] - 320:25
add [2] - 312:9,
370:2
addition [3] - 323:4,
349:5, 355:17
additional [9] -
330:8, 391:1, 391:11,
394:14, 394:23,
395:12, 395:17,
396:2, 396:7
address [2] - 464:7,
467:25
addressed [1] -
312:17
addressing [1] -
458:9
adds [1] - 330:7
adequately [1] -
395:14
administered [1] -
315:13
administration [4] -
315:12, 321:21,
336:4, 341:3
admitted [1] - 315:6
adopted [1] - 404:1
advised [1] - 440:5
Affairs [1] - 449:7
after-action [8] -
446:22, 446:25,
447:3, 447:9, 457:12,
461:2, 461:25, 465:11
aftermath [1] - 352:9
age [1] - 315:10
agencies [22] -
323:8, 323:14, 328:8,
331:4, 359:12,
362:22, 363:19,
373:25, 374:3, 390:1,
391:24, 392:25,
394:18, 398:17,
403:16, 403:20,
408:23, 414:20,
418:25, 419:5, 445:4,
452:24
agency [54] - 340:14,
340:25, 349:19,
369:2, 369:4, 382:5,
383:9, 383:10,
383:22, 384:3,
386:18, 386:21,
387:15, 389:21,
390:24, 391:2, 392:4,
392:22, 393:1, 393:3,
393:6, 393:13, 395:9,
395:14, 396:13,
396:18, 397:2,
398:14, 398:19,
403:25, 404:1, 404:6,
414:3, 417:20,
418:14, 418:25,
431:23, 432:9,
432:19, 434:4, 434:7,
436:11, 436:15,
437:11, 438:8,
444:22, 445:2,
446:21, 452:20,
454:10, 463:25,
465:12, 467:5, 467:13
agenda [2] - 423:12
aggressive [1] -
325:16
ago [5] - 314:9,
315:6, 362:7, 413:24
agree [36] - 352:6,
388:15, 388:19,
389:24, 390:3,
390:15, 390:24,
391:3, 391:8, 395:11,
395:15, 400:12,
401:18, 402:2, 402:9,
402:18, 405:7,
408:25, 410:22,
411:8, 411:15,
411:22, 412:3, 412:4,
412:22, 413:25,
420:13, 423:8, 428:8,
434:8, 437:17,
454:25, 455:18,
459:3, 460:19, 463:3
agreed [2] - 362:14,
446:15
agreement [7] -
333:21, 334:2, 334:5,
434:16, 436:14,
437:3, 437:24
agreements [2] -
366:24, 366:25
ahead [2] - 413:10,
470:7
aid [3] - 371:17,
394:20, 394:24
aide [2] - 439:17
air [2] - 444:6,
444:12
aircraft [3] - 371:16,
371:19, 371:20
airline [1] - 443:23
airplane [1] - 442:16
Airport [6] - 318:6,
319:3, 324:5, 326:8,
326:12, 371:15
airport [81] - 319:5,
320:13, 323:23,
324:12, 324:15,
324:17, 325:5, 325:6,
325:12, 325:15,
325:17, 325:19,
325:23, 326:4,
327:25, 329:21,
331:21, 332:25,
333:1, 333:4, 371:24,
420:9, 433:13, 434:7,
434:10, 434:12,
436:9, 437:11,
438:25, 439:2, 439:6,
440:8, 440:12,
441:13, 442:12,
443:1, 443:2, 443:4,
443:5, 443:9, 443:23,
443:24, 444:7,
444:10, 444:11,
444:16, 444:17,
444:22, 444:24,
445:1, 445:5, 445:12,
445:17, 445:19,
445:22, 445:23,
446:10, 446:12,
446:14, 446:16,
451:25, 452:5, 452:9,
452:25, 454:20,
455:11, 455:22,
456:13, 456:17,
456:23, 458:4,
464:10, 465:16,
466:14, 467:5,
467:22, 468:10,
468:22, 469:12
airports [10] - 411:4,
419:15, 454:22,
455:12, 455:13,
455:19, 456:14,
458:11, 464:16
Alaska [1] - 440:15
aligned [1] - 408:23
alive [1] - 361:5
allow [3] - 314:21,
337:12, 429:20
allowed [2] - 372:22,
409:21
allowing [1] - 329:23
almost [4] - 314:11,
344:6, 370:3, 463:25
altered [1] - 453:19
amazing [3] -
383:16, 383:20,
463:19
amendment [6] -
316:19, 377:15,
378:3, 379:8, 407:7,
407:10
American's [1] -
377:15
ammunition [1] -
433:17
amount [8] - 328:2,
332:6, 332:21, 372:2,
397:21, 398:23,
433:1, 440:12
analogy [1] - 447:13
analysis [1] - 323:11
analyzing [1] -
449:18
Anchorage [1] -
440:15
ands [1] - 325:7
Angeles [2] - 319:3,
320:12
Angelo [1] - 447:8
announcement [1] -
382:19
annual [1] - 398:4
answer [23] - 384:16,
388:11, 390:9,
390:10, 390:19,
407:2, 410:20,
412:18, 424:4, 432:4,
435:20, 435:25,
436:1, 436:20,
436:21, 437:7,
438:23, 440:8,
440:22, 450:9,
450:11, 464:24, 465:1
answered [2] -
410:18, 464:8
answering [2] -
410:17, 432:16
answers [1] - 388:16
anti [1] - 379:5
anti-gun [1] - 379:5
anyway [2] - 373:22,
445:7
apologize [3] -
383:18, 383:23, 384:4
apologized [1] -
383:17
apparent [1] - 413:22
Appeal [3] - 399:25,
400:5, 401:11
appear [1] - 325:25
appearance [1] -
313:4
APPEARANCES [1] -
309:1
applicable [1] -
324:18
application [1] -
315:11
apply [2] - 341:23,
431:14
appoint [4] - 402:3,
402:10, 402:12,
402:21
appreciate [2] -
316:6, 432:16
appreciated [2] -
340:5, 340:6
apprehending [1] -
361:22
apprehension [1] -
366:3
apprised [2] -
328:12, 370:5

- approach** [2] - 380:8, 447:4
approached [5] - 415:2, 433:21, 434:21, 436:4, 461:14
appropriate [5] - 316:14, 342:2, 380:6, 398:22, 409:25
appropriately [3] - 364:2, 369:19, 370:12
approval [2] - 357:2
approved [5] - 316:19, 357:16, 368:17, 369:20, 447:5
April [3] - 458:18, 458:21, 458:23
apropos [2] - 345:6, 390:21
Area [1] - 467:19
area [14] - 322:23, 371:21, 373:3, 381:2, 407:14, 411:13, 414:1, 454:11, 466:25, 467:1, 468:6, 468:12, 469:2, 469:4
areas [17] - 388:24, 389:3, 389:11, 435:5, 452:1, 452:3, 453:10, 454:17, 454:23, 455:13, 457:15, 462:5, 462:24, 463:4, 463:21, 465:10, 466:8
argument [5] - 313:24, 363:5, 363:23, 364:19, 377:25
arm [1] - 314:11
armed [1] - 346:14
arms [1] - 377:16
ARR [1] - 400:5
arrest [6] - 322:11, 366:2, 366:3, 367:13, 431:3, 431:7
arrestable [1] - 370:23
arrive [1] - 416:15
arrived [3] - 382:14, 382:21, 415:8
arrives [1] - 416:14
article [2] - 338:4, 414:25
ashamed [1] - 462:5
aspect [1] - 421:18
aspects [1] - 467:10
asserted [1] - 377:13
asserts [1] - 364:12
assets [2] - 438:12, 440:10
assign [2] - 327:1, 402:3
assigned [10] - 326:23, 334:3, 334:6, 334:8, 334:16, 341:19, 397:18, 443:5, 467:22, 468:4
assignment [4] - 334:11, 432:2, 448:14, 467:23
assignments [3] - 387:12, 432:24, 452:4
assist [3] - 350:11, 371:17, 445:4
assistant [2] - 460:16, 461:17
assisted [1] - 447:19
Association [4] - 324:7, 324:9, 376:19, 405:9
association [1] - 405:19
assume [2] - 317:13, 392:24
assumed [1] - 328:9
attack [5] - 320:15, 321:16, 446:5, 446:8
attacks [6] - 376:9, 378:2, 381:24, 381:25, 458:11
attempt [1] - 315:19
attend [2] - 398:14, 421:4
attended [3] - 417:20, 420:23, 457:3
attention [4] - 315:14, 315:22, 370:9, 423:11
attest [1] - 421:15
attitude [1] - 341:6
attorney [11] - 313:8, 313:17, 314:2, 315:5, 327:11, 348:6, 386:1, 400:2, 404:13, 407:18, 460:22
attorneys [3] - 313:11, 315:17, 344:17
Audit [1] - 449:8
author [4] - 356:19, 356:20, 447:8, 447:22
authorities [1] - 371:3
authority [5] - 320:5, 385:17, 386:4, 402:3, 402:21
Authority [1] - 458:8
authorized [2] - 389:12, 471:6
authorizing [1] - 451:12
autistic [1] - 369:14
auto [1] - 448:22
automatic [1] - 314:1
automatically [1] - 368:8
autonomy [1] - 344:12
availability [1] - 433:4
aviation [3] - 333:1, 434:13, 437:5
Aviation [1] - 437:3
avoid [2] - 410:14, 467:20
aware [19] - 335:4, 335:24, 339:9, 351:21, 352:14, 359:9, 359:13, 359:14, 360:4, 360:8, 360:11, 368:20, 370:15, 378:25, 388:23, 399:23, 403:24, 444:6, 444:8
always [2] - 321:12, 459:15
-
- B**
-
- backup** [2] - 339:18, 358:24
bad [2] - 429:8, 450:6
baggage [1] - 440:16
Bar [3] - 313:14, 315:6, 316:17
bar [1] - 316:10
bare [2] - 418:22, 440:4
bargaining [2] - 366:23, 366:24
barricade [1] - 322:12
barricaded [2] - 415:14, 430:20
Barring [1] - 361:19
Based [1] - 345:19
based [9] - 314:7, 317:15, 317:16, 345:19, 389:8, 439:4, 450:19, 459:4, 467:20
basic [1] - 391:5
basis [1] - 399:8
Bates [5] - 338:3, 353:15, 380:17, 451:21, 467:18
BCAD [15] - 326:15, 331:3, 434:12, 434:16, 437:10, 438:1, 438:4, 438:10, 439:23, 442:18, 443:22, 445:16, 454:16, 455:8, 458:24
beach [1] - 443:16
Beach [18] - 309:13, 337:9, 337:20, 338:5, 369:9, 370:16, 371:1, 371:4, 371:7, 371:9, 371:10, 414:6, 416:19, 417:9, 419:23, 420:1, 420:20, 448:23
bear [1] - 377:16
became [3] - 336:14, 336:17, 360:5
become [8] - 320:17, 329:5, 339:13, 378:5, 378:25, 412:23, 439:21
becomes [2] - 405:14, 408:10
becoming [6] - 336:22, 340:20, 370:15, 411:2, 411:19, 413:14
BEFORE [1] - 308:14
beginning [1] - 335:22
begins [1] - 324:10
behalf [5] - 309:2, 309:7, 388:2, 388:3, 388:7
behind [4] - 344:5, 424:25, 454:21, 455:12
believes [3] - 316:16, 395:13
belong [1] - 377:4
below [1] - 345:11
ben.kuehne@kuehnelaw.com [1] - 309:10
bench [1] - 318:19
BENEDICT [1] - 309:8
benefit [1] - 312:21
best [6] - 356:23, 374:25, 391:2, 393:16, 393:17, 432:25
better [13] - 321:24, 340:21, 373:4, 375:5, 377:20, 408:19, 409:12, 430:8, 430:16, 430:23, 457:16, 457:17, 457:20
between [8] - 351:7, 353:1, 365:4, 377:24, 410:7, 413:18, 439:8, 446:17
beyond [2] - 391:4, 391:11
big [2] - 341:11, 464:10
biggest [1] - 322:7
bio [1] - 448:15
bit [4] - 325:1, 347:2, 426:19, 429:7
bizarre [1] - 382:13
blank [1] - 429:9
block [5] - 324:14, 422:5, 422:7, 423:23, 424:18
blocks [3] - 422:1, 422:11, 423:13
Blvd [1] - 309:12
board [4] - 338:25, 343:13, 344:16, 345:14
Board [2] - 345:8, 349:16
Bob [1] - 409:6
body [3] - 382:17, 382:18, 383:22
bombing [1] - 468:1
booby [1] - 361:19
Booking [1] - 448:21
boots [3] - 354:11, 354:15, 359:6
BOS [1] - 467:19
bottom [2] - 379:21, 455:6
bounding [3] - 424:19, 425:13, 425:19
Bounding [1] - 424:21
boys [2] - 340:17
breach [1] - 374:10
break [10] - 311:17, 385:5, 397:15, 397:16, 398:7, 398:9, 436:19, 470:3, 470:8
breathes [1] - 337:3
Brief [2] - 385:9, 470:9
brief [4] - 311:9, 311:15, 311:16, 465:1
briefed [2] - 351:14, 461:21
briefing [2] - 311:21, 458:19
briefings [1] - 462:10
bring [6] - 340:7, 347:24, 366:9, 374:19, 425:16, 432:24
bringing [1] - 432:23
brings [1] - 408:9
broke [1] - 318:4
broken [1] - 423:13

brothers [1] - 340:3
brought [7] - 322:19,
 327:8, 351:15,
 380:14, 394:15,
 437:13, 469:2
Broward [66] - 308:4,
 311:7, 320:19,
 326:12, 333:21,
 334:14, 335:5,
 335:13, 335:17,
 336:11, 337:10,
 338:11, 339:7,
 340:21, 343:12,
 343:16, 344:13,
 345:7, 346:13,
 349:10, 349:23,
 350:6, 350:17, 351:7,
 353:1, 357:4, 359:3,
 359:22, 360:1,
 361:15, 371:19,
 374:15, 379:16,
 384:9, 384:15,
 384:24, 385:16,
 385:21, 386:3, 386:8,
 390:11, 390:22,
 392:20, 393:19,
 394:16, 396:18,
 406:15, 414:20,
 415:24, 416:17,
 417:2, 417:6, 418:13,
 420:14, 431:18,
 433:8, 434:5, 434:15,
 434:20, 435:16,
 437:2, 440:18,
 448:10, 448:16,
 458:14, 469:16
BSO [61] - 319:1,
 320:11, 320:17,
 322:21, 323:24,
 324:24, 327:3, 327:6,
 329:6, 330:12, 331:3,
 333:10, 333:21,
 336:6, 340:9, 341:22,
 342:1, 343:3, 343:16,
 343:22, 345:8, 346:3,
 347:18, 349:5,
 349:22, 350:11,
 350:14, 350:17,
 351:7, 351:11, 353:1,
 353:25, 359:1,
 366:21, 367:25,
 374:2, 374:5, 380:1,
 380:20, 382:1, 383:7,
 391:16, 394:22,
 404:5, 404:14, 423:7,
 439:1, 439:5, 443:22,
 445:14, 451:24,
 452:18, 452:23,
 457:7, 458:19,
 458:22, 459:19,
 459:22, 467:5,

467:16, 467:22
BSO's [1] - 404:9
budget [2] - 439:8,
 439:10
budgeted [2] - 439:1,
 439:5
Building [1] - 308:12
building [2] - 322:9,
 434:11
buildings [1] - 435:4
bunny [3] - 347:10,
 347:12, 347:18
bunny/Santa [1] -
 347:22
burglary [1] - 342:10
butts [1] - 325:7
buy [1] - 447:14
BY [15] - 318:3,
 318:18, 329:3,
 385:14, 401:9,
 401:23, 407:8,
 413:11, 423:22,
 424:8, 427:11, 428:6,
 437:1, 440:24, 465:14

C

CALEA [16] - 403:3,
 403:4, 403:5, 403:6,
 403:8, 403:15,
 403:17, 403:20,
 403:24, 404:1, 404:2,
 404:5, 404:6, 404:10,
 405:2
calendar [4] -
 397:17, 420:7, 420:8,
 422:3
California [1] - 362:7
caller [1] - 369:7
calmness [1] -
 374:19
calvary [2] - 430:15,
 431:14
camera [2] - 344:2,
 345:7
cameras [4] -
 344:12, 344:22,
 382:17, 382:18
campaign [4] -
 340:14, 378:5,
 378:18, 378:24
camps [1] - 346:14
candidate [2] -
 341:24, 342:2
candidates [3] -
 378:6, 378:11, 378:12
cannot [4] - 330:13,
 332:1, 332:3, 332:16
capable [1] - 384:15
capacity [1] - 352:15

Capitol [1] - 309:5
Captain [18] -
 326:23, 327:13,
 327:16, 327:18,
 328:5, 328:10,
 338:22, 460:9,
 460:15, 460:21,
 461:12, 462:13,
 462:18, 462:20,
 463:5, 465:22, 466:9,
 466:25
captain [10] - 327:3,
 327:6, 338:16,
 338:19, 338:22,
 448:24, 452:10,
 457:2, 463:18, 468:18
captains [1] - 464:6
car [2] - 358:22,
 442:22
career [1] - 359:6
cargo [1] - 442:19
carrier [1] - 442:19
carry [3] - 354:18,
 411:20, 412:6
carrying [3] - 346:4,
 394:9, 394:10
case [7] - 311:24,
 313:23, 317:5,
 318:20, 399:25,
 400:8, 401:11
casualty [4] - 411:20,
 412:7, 444:13, 464:15
categorized [1] -
 367:25
caught [1] - 464:3
caused [1] - 357:23
caustic [1] - 377:12
caveat [4] - 361:12,
 361:14, 408:5, 408:9
Cedeno [38] - 447:8,
 448:5, 448:8, 449:25,
 450:7, 450:16,
 450:19, 451:4,
 451:12, 451:20,
 452:8, 452:13,
 452:18, 453:15,
 453:21, 454:5, 454:8,
 454:15, 455:6, 455:8,
 455:19, 456:3,
 456:16, 456:22,
 457:1, 457:24,
 458:19, 458:25,
 459:25, 461:5, 463:5,
 464:20, 464:22,
 466:9, 466:25,
 468:13, 469:9
Cedeno's [10] -
 454:18, 459:25,
 460:17, 460:23,
 461:4, 461:23,

462:25, 465:21,
 467:15, 468:8
center [10] - 372:13,
 372:16, 372:19,
 372:23, 373:5,
 373:10, 373:12,
 373:14, 373:15,
 374:12
centers [1] - 373:13
Central [1] - 448:20
certain [12] - 333:22,
 344:2, 375:12,
 379:13, 396:7,
 398:14, 398:25,
 399:3, 427:16,
 431:25, 433:18,
 439:14
Certainly [2] - 351:9,
 395:18
certainly [16] - 314:2,
 314:15, 314:21,
 315:18, 315:23,
 316:15, 320:16,
 321:13, 325:16,
 351:23, 363:17,
 374:6, 390:9, 407:3,
 411:23, 451:1
certainty [1] - 456:6
certificate [1] -
 391:20
CERTIFICATE [1] -
 471:1
certification [2] -
 379:25, 380:20
certified [1] - 363:19
certify [1] - 471:6
cetera [1] - 328:8
chain [1] - 386:7
chairman [1] - 409:6
chairs [1] - 452:18
chance [7] - 331:18,
 416:18, 427:1, 427:3,
 427:4, 428:12, 463:14
change [6] - 365:18,
 407:21, 409:11,
 409:18, 410:12,
 410:13
changed [10] -
 386:23, 386:24,
 407:18, 407:25,
 408:14, 408:18,
 408:19, 408:24,
 409:1, 468:3
changes [2] - 450:9,
 450:11
changing [1] -
 408:11
channels [1] -
 373:18
chaos [1] - 373:1

charge [9] - 319:22,
 319:25, 338:20,
 338:21, 351:18,
 367:14, 438:8, 445:3,
 449:18
charged [2] - 400:16,
 400:21
chased [1] - 431:5
check [1] - 422:2
chefs [1] - 447:15
chemistry [1] - 423:1
cherry [1] - 330:24
cherry-pick [1] -
 330:24
chief [1] - 390:25
Chiefs [1] - 405:9
child [2] - 340:12,
 361:4
children [6] - 341:1,
 346:19, 351:8,
 372:25, 376:5, 396:22
chose [1] - 317:2
chosen [4] - 447:8,
 447:11, 448:8, 459:11
Christmas [2] -
 397:16, 398:9
circles [5] - 329:12,
 354:23, 356:10,
 356:12, 360:10
circumstances [3] -
 400:18, 408:9, 443:18
circumvent [1] -
 315:19
cities [1] - 374:16
citizen [1] - 361:7
City [2] - 448:23,
 458:7
city [4] - 359:3,
 371:5, 371:6, 374:18
civilians [3] - 439:14,
 439:15, 440:2
CJSTC [9] - 388:16,
 388:20, 389:19,
 389:25, 391:5, 393:8,
 394:3, 394:20, 395:6
CJSTC's [1] - 395:19
claim [2] - 318:23,
 364:11
claims [4] - 330:13,
 332:1, 332:15, 364:17
clamor [1] - 351:10
clarification [3] -
 375:11, 387:20,
 453:13
classified [1] -
 382:21
classroom [1] -
 415:16
classrooms [3] -
 337:14, 337:15,

- 337:18
Claus [4] - 347:9,
 347:12, 347:18,
 347:22
cleaning [1] - 434:10
cleanup [2] - 425:9,
 428:17
clear [5] - 314:15,
 314:25, 325:20,
 328:21, 469:12
clearing [1] - 418:6
Clearly [1] - 354:8
clearly [1] - 461:21
close [1] - 381:1
closer [1] - 407:3
closest [1] - 361:18
closing [3] - 311:25,
 313:24, 314:20
CNN [1] - 381:15
coach [2] - 340:17,
 348:11
coached [2] -
 340:18, 340:19
code [5] - 313:14,
 352:15, 352:20,
 352:24, 353:6
coerce [1] - 315:20
cognizant [2] -
 321:4, 367:1
coincide [1] - 421:23
collateral [2] -
 431:24, 432:4
collective [2] -
 366:23, 366:24
colonel [3] - 320:22,
 320:23, 366:8
Colonel [17] - 324:6,
 324:11, 337:1,
 339:19, 339:25,
 351:13, 351:16,
 351:25, 354:12,
 372:15, 452:9,
 454:16, 455:8, 457:2,
 460:16, 467:9
colonels [8] -
 329:17, 372:14,
 418:18, 419:4,
 463:10, 464:5, 464:6
Columbine [4] -
 322:5, 412:9, 413:12,
 413:19
combination [2] -
 347:8, 347:9
coming [6] - 311:15,
 313:21, 340:1,
 361:19, 384:3, 461:21
comma [3] - 361:9,
 361:12, 361:13
command [36] -
 319:15, 320:21,
 320:24, 321:8, 323:5,
 351:16, 354:15,
 355:1, 362:23, 372:8,
 372:14, 372:16,
 372:19, 372:22,
 373:12, 373:13,
 373:15, 386:7, 406:1,
 406:6, 406:7, 406:11,
 418:18, 441:2, 445:3,
 447:1, 449:12,
 451:11, 451:25,
 452:10, 456:7, 456:9,
 459:15, 464:19
commander [3] -
 336:24, 336:25,
 382:23
commanders [1] -
 320:25
commenced [1] -
 433:21
comment [3] -
 365:21, 401:10, 408:8
comments [5] -
 314:4, 316:2, 317:2,
 377:12, 418:19
commerce [1] -
 445:24
commission [1] -
 409:17
Commission [4] -
 355:6, 387:22, 405:2,
 409:7
commit [1] - 402:23
committed [2] -
 316:11, 412:19
communicate [1] -
 376:1
communicates [1] -
 336:7
communication [3] -
 323:7, 373:21, 379:20
communications [2]
 - 331:5, 380:2
community [20] -
 320:18, 323:7, 331:5,
 340:19, 374:19,
 375:22, 376:2,
 381:17, 381:19,
 381:23, 382:2, 383:5,
 384:2, 384:21,
 395:14, 396:16,
 432:25, 439:17,
 464:1, 469:13
compare [3] -
 355:15, 390:12,
 466:19
compared [2] -
 413:24, 432:3
compilation [2] -
 356:22, 447:6
complacency [8] -
 341:5, 341:9, 467:16,
 467:20, 468:22,
 468:23, 469:10,
 469:11
complete [8] - 328:3,
 329:13, 337:24,
 344:11, 372:25,
 393:17, 465:4, 471:8
completed [2] -
 392:1, 459:5
Completely [1] -
 454:3
completely [8] -
 332:6, 332:20, 333:8,
 335:15, 356:3,
 366:22, 367:7, 469:5
complex [2] -
 338:14, 400:15
complexity [1] -
 338:9
complimentary [1] -
 341:18
comply [2] - 360:1,
 374:11
components [3] -
 337:23, 380:12,
 380:13
comprehensive [1] -
 337:11
computer [1] -
 367:24
COMs [1] - 453:1
concentrate [1] -
 397:25
concept [1] - 443:11
concern [15] -
 312:18, 314:6, 315:3,
 315:15, 336:7, 376:4,
 427:20, 427:25,
 435:5, 454:17, 464:9,
 466:9, 467:15, 469:2,
 469:4
concerned [2] -
 315:14, 344:17
concerning [1] -
 316:10
concerns [1] - 313:1
concerted [1] -
 405:23
conclude [1] -
 332:19
concludes [1] -
 324:10
conclusion [2] -
 311:11, 312:1
conclusions [2] -
 311:13, 360:23
condemnation [1] -
 315:18
conditions [1] -
 379:13
conduct [6] - 313:15,
 316:12, 316:17,
 316:22, 351:11,
 446:22
conducted [1] -
 449:15
conference [6] -
 324:8, 324:9, 324:12,
 324:13, 329:23,
 331:13
conferences [1] -
 324:25
conferring [2] -
 373:8
confidence [1] -
 383:9
conflict [4] - 347:1,
 347:5, 445:15, 445:18
Congress [6] -
 359:10, 359:15,
 360:6, 360:9, 457:9,
 458:2
Congress' [1] -
 396:1
congressional [2] -
 359:20, 359:21
congressman [2] -
 376:23, 377:2
Congressman [3] -
 376:23, 457:3, 457:19
connected [2] -
 368:8, 368:10
Conroy [1] - 358:24
conscience [1] -
 348:8
consent [1] - 311:18
conservator [3] -
 376:12, 399:21, 401:3
conservators [1] -
 400:11
conserving [1] -
 336:10
consideration [1] -
 317:11
considered [4] -
 334:24, 412:5,
 419:19, 449:12
consistent [8] -
 355:21, 362:16,
 362:20, 363:10,
 363:13, 363:15,
 363:18, 374:7
Consistent [1] -
 355:23
constant [1] - 418:7
constantly [2] -
 358:23, 418:4
Constitution [1] -
 316:20
constitutional [2] -
 385:22, 385:23
consummate [1] -
 337:2
contact [2] - 367:7,
 429:16
contains [1] - 411:13
contends [2] - 363:2,
 363:22
contest [1] - 315:10
contesting [2] -
 313:18, 313:22
context [1] - 330:23
continuation [1] -
 311:5
continue [5] -
 317:21, 318:14,
 322:15, 446:12, 465:1
Continued [1] -
 310:4
continued [2] -
 311:2, 470:10
CONTINUED [1] -
 318:2
continues [1] -
 429:23
continuous [1] -
 416:4
contract [5] - 349:5,
 434:17, 435:25,
 439:22, 439:23
contracted [1] -
 434:6
contracts [1] -
 440:11
contractual [1] -
 437:3
contrary [1] - 467:25
contrast [1] - 355:15
contributing [1] -
 447:22
contributor [1] -
 448:1
control [1] - 445:2
conversation [3] -
 328:11, 332:23, 409:5
conversations [8] -
 344:7, 344:8, 406:11,
 437:6, 454:17, 458:1,
 467:7
convicted [1] -
 377:17
cooks [1] - 447:15
cooperate [1] - 374:2
cooperation [1] -
 409:16
cooperative [1] -
 339:4
coordinate [1] -

- 374:2
coordination [3] -
 351:7, 373:25, 448:21
cop [1] - 448:6
cops [1] - 359:5
copy [1] - 353:14
Coral [4] - 322:20,
 373:17, 373:19,
 374:17
correct [28] - 319:14,
 320:6, 333:24, 334:1,
 336:9, 349:9, 350:6,
 352:4, 368:3, 368:7,
 368:9, 368:13,
 368:16, 369:15,
 369:18, 393:18,
 393:20, 394:2, 394:4,
 394:20, 397:19,
 403:14, 403:18,
 406:12, 407:15,
 430:5, 449:9, 456:7
Correct [39] - 326:6,
 341:25, 352:2, 352:5,
 352:23, 353:3,
 368:24, 386:17,
 387:16, 387:18,
 389:18, 393:7,
 393:21, 394:25,
 395:3, 396:5, 397:9,
 398:6, 398:8, 398:10,
 405:15, 410:11,
 415:7, 416:16, 417:5,
 417:17, 421:6,
 421:10, 421:24,
 422:15, 424:23,
 431:16, 434:14,
 439:3, 442:17,
 452:17, 456:25,
 458:5, 458:12
correcting [1] -
 448:12
correctly [4] -
 370:13, 370:21,
 444:4, 459:6
correlate [1] - 469:15
corresponds [1] -
 410:4
Corruption [1] -
 449:7
council [1] - 372:18
counsel [8] - 357:4,
 357:13, 387:21,
 396:1, 415:1, 421:2,
 460:16, 461:17
COUNSEL [1] -
 309:1
Counsel [4] - 309:4,
 311:8, 312:7, 370:2
count [1] - 445:14
counter [2] - 454:24,
 455:15
counter-terrorism
 [2] - 454:24, 455:15
counties [1] - 331:10
countless [1] -
 341:12
country [13] - 321:6,
 321:17, 323:15,
 325:15, 329:17,
 339:14, 339:17,
 339:22, 340:6,
 356:18, 362:23,
 410:23, 464:16
County [38] - 308:4,
 311:7, 324:7, 326:12,
 333:21, 334:14,
 335:5, 336:11,
 337:10, 338:11,
 339:7, 340:21,
 343:12, 343:16,
 344:13, 345:7,
 346:13, 349:10,
 349:16, 349:23,
 350:6, 350:17, 353:1,
 359:3, 361:15,
 370:16, 371:1, 371:4,
 371:9, 371:20,
 384:10, 384:15,
 385:16, 390:11,
 390:22, 414:21,
 433:8, 437:2
county [9] - 324:16,
 370:18, 371:8, 391:9,
 392:9, 417:24,
 432:22, 438:2, 438:3
couple [2] - 404:12,
 458:6
courage [1] - 348:7
course [19] - 314:22,
 326:20, 331:19,
 347:5, 349:3, 372:10,
 377:6, 378:18,
 378:24, 384:13,
 391:19, 423:7, 423:9,
 423:12, 426:10,
 438:16, 444:20,
 444:25
courses [1] - 335:1
COURT [1] - 423:18
court [2] - 328:24,
 470:1
Court [7] - 308:22,
 399:25, 400:4,
 401:11, 423:16,
 471:6, 471:15
covered [2] - 389:4,
 394:19
crazed [1] - 321:22
create [4] - 333:5,
 356:19, 393:9, 446:23
created [3] - 386:24,
 415:12
creation [3] - 385:22,
 406:14, 407:10
credited [1] - 447:21
crime [11] - 365:9,
 373:6, 400:24, 401:4,
 401:16, 435:10,
 435:15, 436:12, 453:1
criminal [3] - 313:23,
 365:25, 452:25
Criminal [1] - 387:21
criteria [1] - 456:21
critical [12] - 321:6,
 322:4, 328:17, 329:4,
 329:12, 330:1,
 344:10, 463:7,
 465:23, 466:15,
 469:3, 469:5
criticism [4] - 343:6,
 346:8, 356:8, 410:14
criticisms [1] -
 329:14
criticized [2] -
 356:14, 357:18
criticizes [2] - 343:3,
 346:2
cross [3] - 385:6,
 385:11, 469:25
Cross [1] - 310:5
CROSS [1] - 385:13
cruise [1] - 442:11
crystal [1] - 469:12
crystal-clear [1] -
 469:12
CSU [1] - 452:25
Curcio [2] - 391:23,
 392:18
current [2] - 369:14,
 452:4
custody [4] - 361:25,
 382:22, 431:9, 433:25
cut [2] - 463:6,
 464:23
cycle [5] - 422:17,
 422:18, 422:19,
 422:21
-
- D**
-
- dad** [2] - 340:16,
 384:20
Dade [4] - 349:16,
 390:8, 390:16, 456:17
daily [1] - 346:17
Dale [3] - 324:6,
 324:11, 372:15
Dana [1] - 376:21
data [1] - 393:20
date [1] - 439:23
Date [1] - 406:21
DATE [1] - 308:11
DATED [1] - 471:11
dated [6] - 328:22,
 345:2, 405:6, 439:21,
 465:21, 465:22
dates [2] - 404:24,
 405:6
Davis [1] - 309:8
day-long [1] - 337:24
days [6] - 378:10,
 382:8, 397:4, 397:7,
 397:10, 452:13
de [1] - 389:1
de-escalation [1] -
 389:1
dead [1] - 429:10
deal [5] - 314:14,
 341:11, 374:12,
 443:22, 464:10
deals [1] - 350:8
dealt [1] - 314:2
Debbie [2] - 457:3,
 457:19
debrief [8] - 425:8,
 428:16, 452:19,
 453:3, 453:6, 458:23,
 462:9, 462:10
debriefing [1] -
 457:21
Debriefs [1] - 451:22
decide [2] - 345:17,
 463:11
decided [3] - 373:19,
 422:16, 446:6
decision [13] - 315:2,
 315:21, 375:18,
 386:9, 386:20, 387:4,
 387:6, 387:11, 398:3,
 398:25, 400:5,
 407:21, 432:6
decision-maker [2] -
 315:2, 386:9
decision-makers [1]
 - 315:21
decision-making [1]
 - 375:18
decisions [4] -
 317:13, 317:15,
 387:15, 387:17
decommissioned [1]
 - 442:19
decorated [1] - 456:9
deems [1] - 384:24
deeply [1] - 316:9
default [2] - 402:12,
 402:23
defendant [1] -
 313:25
deference [1] - 315:8
deficiencies [1] -
 449:22
deficient [2] -
 454:21, 455:11
define [2] - 412:8,
 413:1
defined [1] - 411:12
defuse [1] - 415:18
demand [2] - 351:10,
 362:13
demean [1] - 367:3
Demoted [1] - 387:9
demoted [1] - 366:17
Denied [1] - 413:10
dep [1] - 381:25
Department [12] -
 351:19, 363:20,
 373:9, 389:19,
 390:17, 391:6,
 448:20, 449:6,
 450:21, 453:2, 458:9,
 468:19
department [6] -
 337:21, 349:15,
 369:8, 405:13,
 449:23, 452:20
departments [1] -
 454:10
deployment [1] -
 456:21
deposition [2] -
 420:6, 460:12
depositions [1] -
 421:12
deputies [46] -
 341:6, 342:3, 347:25,
 356:24, 357:23,
 361:17, 364:13,
 367:8, 368:25, 369:3,
 371:25, 382:16,
 382:18, 390:12,
 394:8, 394:16,
 394:22, 396:4,
 396:21, 397:22,
 398:13, 398:18,
 398:20, 398:21,
 402:2, 402:10,
 402:12, 402:21,
 402:22, 407:14,
 408:20, 409:24,
 410:1, 410:2, 410:15,
 438:14, 438:17,
 439:1, 439:5, 439:13,
 440:1, 440:6, 443:5,
 443:11, 443:17,
 467:22
deputy [42] - 347:19,
 348:18, 358:23,
 367:10, 387:2,
 387:12, 391:16,

- 391:18, 391:21,
397:18, 400:11,
402:10, 407:13,
420:23, 421:13,
422:12, 425:14,
425:20, 426:2,
426:12, 426:14,
427:18, 427:19,
428:4, 428:7, 428:13,
429:1, 429:3, 429:9,
429:12, 429:15,
429:18, 429:20,
430:4, 430:7, 430:12,
431:14, 431:15,
435:17, 440:19,
448:19
Deputy [19] - 309:4,
334:8, 352:9, 352:14,
358:24, 364:13,
367:16, 368:19,
369:5, 369:13,
369:16, 369:24,
371:14, 421:1, 429:7,
433:20, 433:23,
447:24, 451:5
deputy's [1] - 368:23
DeSantis [5] - 309:2,
314:10, 314:22,
378:16, 378:17
describe [1] - 374:22
described [1] -
369:14
deserve [1] - 419:20
designed [3] -
370:12, 417:1, 443:21
desirable [1] - 356:1
desire [1] - 348:8
desired [2] - 356:2,
356:3
desks [1] - 365:12
detail [1] - 331:16
detect [1] - 341:5
Detective [2] -
391:23, 392:18
Detention [1] -
448:20
deter [1] - 468:1
determine [2] -
391:1, 466:7
determining [1] -
366:14
Deutsch [1] - 376:24
develop [7] - 316:21,
339:18, 353:4,
379:20, 380:9,
405:23, 465:13
developed [3] -
409:13, 425:2, 455:24
developing [5] -
354:14, 362:2,
362:13, 380:1, 418:21
development [6] -
353:16, 353:21,
354:20, 354:21,
355:20, 407:6
developments [1] -
323:19
dialog [3] - 325:2,
343:21, 352:1
dictate [2] - 389:20,
389:25
Diefenbacher [15] -
326:23, 327:10,
327:14, 327:16,
327:18, 328:5,
328:10, 460:9,
460:15, 460:21,
462:13, 462:18,
463:5, 466:9, 466:25
Diefenbacher's [3] -
461:13, 462:21,
465:22
differed [1] - 379:10
difference [4] -
379:15, 409:20,
409:22, 410:7
differences [2] -
375:13, 383:13
different [23] - 322:6,
328:8, 335:12,
335:15, 337:23,
338:10, 340:19,
347:14, 347:15,
358:9, 358:11,
373:18, 391:24,
404:14, 419:17,
446:5, 452:24,
454:10, 458:25
differently [2] -
322:5, 375:5
difficulty [1] - 413:7
diffusion [1] - 388:25
DiMaggio [5] - 337:2,
338:16, 338:19,
339:19, 340:1
dimension [1] -
404:2
dimensions [1] -
342:12
diminish [1] - 367:2
Direct [1] - 310:4
direct [11] - 312:2,
319:17, 339:2,
401:25, 405:22,
408:3, 418:11,
423:11, 433:7,
441:18, 444:4
DIRECT [1] - 318:2
directed [1] - 369:7
directing [1] - 373:7
direction [5] -
327:13, 386:15,
393:8, 420:15
directive [4] -
410:15, 429:25,
430:11, 431:12
director [4] - 444:17,
445:22, 446:12, 455:9
Director [1] - 354:4
directors [1] -
455:23
disagree [10] -
396:10, 428:19,
428:23, 434:5,
448:17, 448:18,
455:16, 455:18,
462:16, 462:19
disagreed [2] -
377:22, 399:20
discharge [1] -
352:10
discipline [6] -
366:6, 366:7, 366:9,
366:14, 367:9, 368:17
disciplined [4] -
364:16, 367:5,
368:14, 369:19
disciplines [1] -
342:12
discount [1] - 450:16
discretion [4] -
361:3, 408:10,
410:14, 410:16
discriminatory [1] -
389:4
discuss [13] -
311:10, 311:18,
350:17, 351:20,
406:8, 437:2, 437:10,
451:25, 452:10,
452:15, 453:9,
454:10, 454:16
discussed [6] -
385:25, 386:1,
438:24, 441:3,
441:18, 457:24
discussion [14] -
323:11, 325:9, 352:1,
399:17, 403:1,
405:21, 435:11,
435:19, 437:5,
445:21, 446:13,
446:17, 456:20, 458:8
Discussion [1] -
318:17
discussions [11] -
344:19, 345:11,
345:13, 346:12,
353:13, 354:15,
357:5, 437:21, 457:8,
459:1, 459:14
dismissal [1] -
314:24
dispatched [1] -
371:20
dispute [1] - 458:17
distance [1] - 429:9
distributed [1] -
329:9
district [12] - 434:13,
436:9, 444:22,
448:23, 451:25,
452:25, 456:17,
456:23, 467:5,
467:16, 467:19,
467:23
District [5] - 399:24,
400:4, 401:11, 433:9,
437:3
distrust [1] - 382:4
diversified [1] -
320:21
diversity [2] - 389:6,
389:7
division [3] - 333:1,
448:21, 455:8
Division [2] - 326:13,
449:7
document [13] -
345:2, 345:3, 367:7,
427:17, 451:2,
453:13, 453:16,
453:18, 453:21,
454:2, 455:21, 462:2
documentation [2] -
367:15, 380:19
documents [3] -
345:1, 450:3, 466:16
dog [2] - 337:17,
337:19
domestic [1] - 389:5
done [26] - 319:7,
320:4, 321:10,
326:21, 336:10,
337:7, 339:6, 339:10,
345:11, 364:17,
367:15, 368:15,
375:4, 384:14,
385:21, 418:9,
422:21, 422:22,
422:23, 426:2, 426:5,
426:25, 428:15,
435:22, 435:23,
465:16
door [3] - 361:19,
362:6, 362:8
doorway [1] - 361:20
doubt [1] - 468:9
Douglas [28] - 322:8,
322:14, 333:18,
333:25, 334:19,
335:21, 343:4, 346:3,
350:24, 351:4,
357:17, 365:6, 365:7,
371:13, 371:16,
371:25, 372:4, 372:6,
373:24, 376:1,
376:16, 381:9,
381:21, 382:16,
394:9, 407:25, 409:1,
409:7
down [30] - 313:7,
323:11, 325:6,
325:12, 325:15,
325:19, 326:4,
337:17, 352:20,
368:11, 414:17,
421:8, 421:20,
423:13, 426:6,
434:23, 436:19,
440:14, 444:12,
444:17, 445:5,
445:17, 446:3,
446:10, 446:14,
446:15, 456:13,
459:12, 464:7
draft [29] - 318:25,
319:7, 319:19,
326:19, 328:13,
451:19, 453:14,
453:16, 453:22,
453:25, 454:2, 454:3,
454:4, 454:5, 459:2,
459:5, 459:7, 459:16,
459:20, 459:25,
462:21, 465:21,
465:22, 466:14,
466:17, 467:7, 467:9,
467:11
drafted [1] - 449:4
drafts [6] - 455:25,
465:16, 465:18,
465:20, 465:25, 466:7
dreadfully [1] -
382:20
drill [1] - 368:11
Drive [1] - 308:23
driven [1] - 442:22
driving [1] - 411:25
drop [1] - 429:14
Dropped [1] - 433:20
dropped [2] - 439:9,
439:10
Dudley [1] - 308:14
due [6] - 312:19,
313:3, 313:4, 316:15,
316:24, 316:25
During [1] - 336:21
during [14] - 311:17,
326:8, 335:22, 341:2,

345:4, 377:11,
378:22, 397:22,
397:23, 398:7, 398:9,
443:17, 452:16,
464:24
duties [4] - 357:20,
397:19, 399:14,
449:15
duty [6] - 330:9,
364:12, 400:16,
400:21, 400:23, 401:4
dying [1] - 430:22

E

E-mail [3] - 309:6,
309:10, 309:14
e-mailed [1] - 421:13
early [1] - 336:18
earth [1] - 348:7
easier [1] - 373:3
easily [1] - 411:13
Eason [6] - 364:13,
365:17, 365:20,
367:16, 367:19,
368:14
Eason's [1] - 368:20
Easter [4] - 347:10,
347:12, 347:17,
347:22
easy [1] - 338:13
eats [1] - 337:3
Ed [1] - 338:22
edits [1] - 328:16
educate [1] - 376:14
effect [2] - 367:11,
410:13
effective [2] - 330:2,
384:15
effectively [1] -
346:14
effort [5] - 351:6,
364:11, 371:16,
405:23, 447:9
efforts [2] - 319:4,
340:7
egregious [1] -
372:21
either [9] - 333:3,
365:17, 365:20,
365:25, 385:22,
389:12, 417:25,
431:3, 460:16
elected [10] - 317:1,
317:9, 317:14,
317:16, 336:14,
384:5, 384:6, 385:15,
399:15, 412:21
Elected [1] - 373:2
election [2] - 378:19,

378:22
element [1] - 348:12
elementary [1] -
341:21
elevated [1] - 319:4
eliminate [4] -
322:10, 361:7,
361:21, 401:16
embryonic [1] -
382:9
emergency [1] -
452:15
emotional [2] -
365:10, 462:16
emphasize [2] -
330:1, 340:11
employee [2] -
386:3, 387:7
employees [3] -
349:20, 443:24
encourage [2] -
311:16, 346:19
encouraged [2] -
330:4, 343:16
end [3] - 320:7,
377:11, 416:10
endeavor [2] - 339:5,
445:25
Enforcement [7] -
351:19, 363:20,
373:9, 389:20, 391:6,
405:3, 453:2
enforcement [66] -
323:6, 323:14,
323:20, 324:4, 326:5,
329:12, 331:4,
333:17, 335:9,
339:14, 339:16,
339:22, 340:3, 340:6,
346:24, 347:2,
347:23, 349:7,
349:11, 349:24,
350:9, 354:23,
355:24, 356:10,
356:12, 357:11,
359:6, 359:11,
360:10, 362:22,
363:19, 371:2, 371:3,
374:8, 382:1, 388:20,
389:16, 390:1, 391:7,
391:14, 392:19,
396:12, 403:16,
405:1, 411:18,
413:22, 414:3, 419:5,
434:6, 434:18,
434:22, 435:5,
435:12, 435:17,
436:5, 436:11,
436:14, 437:4,
437:10, 438:3, 439:9,

441:1, 444:11, 450:2,
450:5, 450:20
enforcing [1] -
333:15
engage [2] - 361:21,
425:4
engaged [3] -
406:10, 415:6, 416:14
enhance [1] - 351:8
enhanced [2] -
467:2, 467:4
enjoy [1] - 316:15
enjoyed [1] - 341:15
ensure [2] - 315:12,
396:2
enter [8] - 311:21,
322:9, 361:25, 362:4,
382:16, 407:14,
436:13, 447:2
entered [2] - 337:15,
440:15
entering [1] - 435:11
entire [8] - 317:5,
325:6, 384:7, 405:4,
427:16, 443:22,
444:12, 446:19
entirely [2] - 363:10,
385:21
entities [1] - 345:15
entitled [2] - 450:23,
450:24
entrance [2] -
343:10, 361:19
entrusted [1] -
437:18
entryways [1] -
343:5
environment [1] -
467:21
EOG [3] - 451:21,
467:1, 467:18
equally [1] - 315:13
equated [1] - 313:22
equipment [1] -
322:25
escalation [1] -
389:1
especially [4] -
313:5, 319:1, 396:18,
397:1
ESQ [3] - 309:3,
309:3, 309:8
essence [1] - 340:20
essential [1] - 434:9
essentially [10] -
323:15, 324:23,
335:23, 342:18,
346:23, 352:20,
368:11, 402:20,
408:4, 424:21

established [2] -
353:25, 450:8
establishment [1] -
352:24
et [1] - 328:8
ethical [1] - 313:15
etymology [1] -
461:7
evacuating [1] -
443:22
evacuations [1] -
457:25
evaluate [3] -
392:11, 430:9
evaluating [2] -
334:15, 392:13
evaluation [2] -
328:7, 354:1
evaluations [1] -
468:11
event [18] - 323:5,
328:2, 330:14,
330:15, 331:6, 332:2,
332:4, 332:16, 333:8,
416:7, 436:9, 441:1,
441:13, 441:14,
444:12, 444:13,
444:23, 464:15
events [11] - 320:12,
336:2, 365:25, 411:2,
411:21, 412:7, 434:2,
452:11, 452:16,
458:25, 468:1
eventually [4] -
378:11, 442:7,
460:18, 461:9
ever-evolving [1] -
322:3
everywhere [1] -
412:2
evidence [1] -
317:11
evident [3] - 352:8,
371:23, 372:1
evolving [1] - 322:3
exact [1] - 412:17
exactly [9] - 331:8,
332:11, 361:16,
375:20, 397:21,
401:2, 401:10,
422:22, 457:11
Exactly [3] - 336:12,
370:10, 370:14
Examination [1] -
310:5
EXAMINATION [2] -
318:2, 385:13
examination [11] -
312:2, 385:6, 385:11,
401:25, 405:22,

408:3, 418:11, 433:7,
441:19, 444:5, 469:25
example [5] -
323:10, 343:24,
349:16, 396:19, 428:3
excellent [1] - 465:8
exceptions [1] -
362:1
exchange [1] -
377:23
exchanging [1] -
326:14
excited [1] - 341:14
excuse [3] - 370:20,
403:5, 452:5
EXECUTIVE [2] -
308:3, 308:10
Executive [5] -
309:4, 311:6, 354:3,
447:19, 451:4
executive [2] -
447:20, 448:23
exercise [29] -
338:13, 400:8, 414:7,
414:21, 416:4,
417:12, 417:21,
417:23, 418:24,
419:3, 419:8, 420:1,
420:9, 420:16,
424:22, 425:1,
427:18, 428:3,
428:13, 430:7,
441:19, 441:22,
442:1, 442:20, 443:6,
443:9, 443:21, 447:2,
456:19
Exercise [14] - 426:7,
426:8, 426:11,
426:14, 426:18,
426:22, 427:12,
428:3, 428:5, 428:7,
428:11, 429:1, 429:3,
443:1
exercises [7] -
419:20, 425:6, 426:1,
426:4, 428:16,
428:21, 458:1
exhaustive [1] -
318:25
exhibit [3] - 401:20,
404:13, 421:2
Exhibit [17] - 328:21,
338:2, 344:25, 350:1,
350:2, 353:14, 363:9,
380:16, 380:17,
381:5, 404:22, 405:1,
406:20, 423:5, 451:19
Exhibits [3] - 380:14,
380:15, 469:19
exist [2] - 385:18,

403:2
existed [4] - 344:12,
 407:11, 410:8, 465:25
exists [1] - 407:13
expansion [1] -
 452:5
expect [1] - 445:4
expected [1] -
 356:25
experience [8] -
 324:24, 326:5, 333:6,
 357:10, 392:19,
 450:20, 463:18,
 463:20
experienced [1] -
 342:2
experiences [2] -
 453:7, 458:10
experiencing [1] -
 445:19
expertise [1] - 354:6
experts [1] - 328:7
explain [5] - 331:14,
 331:18, 338:9,
 353:19, 364:4
explained [3] -
 320:8, 323:4, 352:1
explanation [1] -
 380:23
expose [1] - 430:16
exposure [1] -
 467:24
extension [1] - 452:5
extensive [2] -
 357:10, 399:4
extraordinary [1] -
 331:7
exuberant [1] -
 341:13
eye [1] - 315:19
eyes [1] - 460:1

F

face [1] - 357:24
facet [1] - 418:24
faceted [1] - 446:8
facilitate [1] - 349:22
facing [1] - 458:14
fact [9] - 314:19,
 326:11, 332:19,
 335:4, 356:14,
 393:11, 394:7, 434:6,
 448:8
factors [2] - 343:23,
 436:13
facts [12] - 311:13,
 314:8, 388:4, 447:12,
 447:17, 447:18,
 450:10, 450:25,

451:6, 464:20, 467:11
fail [1] - 313:12
failed [1] - 352:9
failure [5] - 312:20,
 313:24, 352:4,
 368:20, 374:10
failures [1] - 330:11
fair [7] - 346:8,
 372:4, 390:23,
 404:16, 434:19,
 435:24, 469:12
faire [1] - 341:6
fairly [3] - 315:13,
 323:25, 342:8
fallacy [1] - 432:15
false [5] - 332:17,
 381:24, 382:6, 454:6,
 456:4
familiar [10] - 328:15,
 349:14, 350:4,
 353:13, 381:13,
 399:12, 402:6, 403:3,
 403:5, 425:11
families [1] - 375:9
family [1] - 445:9
far [8] - 331:11,
 351:25, 366:20,
 369:19, 373:23,
 377:24, 420:6, 457:22
fast [1] - 373:16
fastest [1] - 464:15
fastest-growing [1] -
 464:15
fathomable [1] -
 370:6
fault [1] - 433:8
faults [1] - 319:1
FBI [7] - 323:13,
 326:8, 326:11,
 326:12, 326:15,
 331:3, 373:8
FDLE [8] - 312:21,
 355:5, 364:8, 387:21,
 388:16, 393:5, 394:1,
 395:1
FDLE's [1] - 395:16
February [9] -
 333:19, 345:3,
 348:15, 356:7,
 365:23, 367:16,
 381:8, 452:9, 452:13
federal [4] - 313:12,
 359:10, 359:15,
 359:22
FedEx [1] - 442:19
feed [1] - 383:3
feedback [1] -
 392:15
felon [1] - 431:7
felons [1] - 377:17

felt [4] - 406:8,
 408:18, 409:14, 447:2
fence [1] - 442:22
fervent [2] - 344:7,
 445:21
feverishly [2] -
 344:1, 344:24
few [7] - 337:9,
 339:15, 356:21,
 358:10, 362:7, 375:4,
 452:8
fictional [2] - 363:8,
 382:11
field [12] - 391:24,
 392:3, 392:10,
 392:20, 393:2, 393:6,
 393:9, 393:12,
 394:24, 397:25, 398:1
fifth [2] - 342:9,
 466:1
Fifth [2] - 400:4,
 401:11
fighting [2] - 314:24,
 377:21
figured [1] - 323:20
file [1] - 348:21
fill [1] - 396:13
final [30] - 311:5,
 319:19, 320:4, 320:6,
 327:19, 327:23,
 328:18, 328:21,
 329:4, 330:10,
 330:13, 332:1,
 356:16, 357:1, 357:2,
 366:9, 386:24,
 447:16, 454:1, 456:1,
 461:10, 463:7,
 463:13, 465:8,
 466:20, 466:21,
 466:22, 466:23, 469:3
finality [1] - 453:23
finalized [1] - 469:6
findings [2] - 311:12,
 319:1
fine [1] - 469:22
fingers [1] - 366:16
finish [2] - 416:10,
 464:25
finished [1] - 327:18
fire [10] - 325:20,
 331:4, 337:20,
 337:21, 416:15,
 418:25, 442:5,
 452:14, 453:2
fired [1] - 366:17
firefighters [1] -
 374:14
firing [1] - 429:9
First [2] - 316:9,
 428:4

first [38] - 312:16,
 324:8, 326:19,
 336:21, 336:24,
 336:25, 337:3,
 340:23, 342:7,
 342:11, 343:22,
 345:2, 362:18,
 374:17, 375:6,
 382:15, 384:17,
 394:19, 394:24,
 400:12, 400:20,
 404:24, 405:2,
 406:17, 406:20,
 412:10, 414:11,
 423:23, 424:12,
 426:11, 428:3, 434:1,
 445:20, 448:6,
 451:19, 459:2, 459:7,
 459:20
first-year [1] - 448:6
five [10] - 321:8,
 377:9, 389:11,
 414:11, 422:19,
 423:13, 438:18,
 440:17, 462:11,
 469:14
Five [3] - 397:6,
 397:7, 433:13
five-year [1] - 422:19
fixed [1] - 344:6
fledged [1] - 391:21
flee [2] - 322:12,
 361:23
flew [1] - 440:16
flick [1] - 344:15
FLL [1] - 455:11
flocking [1] - 373:3
floors [1] - 434:10
FLORIDA [1] - 308:1
Florida [45] - 308:4,
 308:13, 308:24,
 309:5, 309:9, 309:13,
 313:13, 314:11,
 316:17, 316:18,
 316:20, 316:22,
 316:23, 317:9,
 317:14, 317:17,
 339:10, 343:9, 355:5,
 355:15, 356:17,
 359:2, 363:16,
 363:19, 373:8, 378:8,
 385:25, 388:19,
 389:13, 389:17,
 389:19, 389:21,
 390:2, 390:18, 391:6,
 399:12, 399:15,
 399:24, 400:4,
 401:12, 402:6,
 403:11, 405:3, 418:12
fly [2] - 377:18,

440:14
flying [1] - 458:7
focus [1] - 383:19
focused [1] - 320:11
fold [1] - 383:4
folks [10] - 325:17,
 325:18, 329:22,
 342:5, 342:8, 354:17,
 383:6, 418:13, 422:4,
 453:3
folks' [1] - 412:11
follow [7] - 353:9,
 367:3, 370:16,
 374:20, 403:20,
 418:10, 427:3
follow-up [1] -
 370:16
followed [1] - 366:21
following [4] - 332:3,
 378:1, 430:6, 460:8
footage [1] - 450:3
football [1] - 348:10
FOR [1] - 308:10
forbid [2] - 383:7,
 431:5
force [4] - 349:17,
 361:22, 389:8, 448:22
forego [1] - 311:25
foregoing [1] - 471:7
forget [1] - 365:8
form [1] - 329:13
formal [5] - 452:18,
 457:8, 457:18,
 458:21, 458:23
former [4] - 320:25,
 334:8, 382:23, 420:6
formulation [1] -
 357:6
Fort [18] - 318:5,
 323:23, 324:4,
 325:22, 326:8, 329:6,
 333:10, 333:11,
 371:14, 374:16,
 433:12, 444:9,
 452:14, 454:20,
 458:3, 465:16, 466:14
forth [1] - 325:2
Forty [1] - 397:14
forward [3] - 322:16,
 407:12, 443:15
four [14] - 320:23,
 321:7, 329:16, 384:7,
 388:21, 396:17,
 412:15, 415:2,
 424:19, 425:13,
 425:19, 425:21,
 428:13, 428:22
four-hour [1] -
 428:22
four-man [5] -

424:19, 425:13,
425:19, 425:21,
428:13
four-year [1] - 384:7
fourth [1] - 466:1
free [1] - 412:1
frequent [3] - 396:9,
399:8, 413:15
frequently [1] -
398:15
fresh [1] - 351:24
friendly [2] - 347:21,
354:17
frog [2] - 424:22,
425:1
front [2] - 424:24,
466:18
front-line [1] -
466:18
fulfill [3] - 384:11,
384:23, 385:1
fulfilling [1] - 384:13
full [21] - 337:4,
337:11, 339:23,
340:10, 349:15,
351:11, 362:24,
362:25, 391:21,
409:16, 417:21,
417:22, 419:8,
419:20, 420:1, 420:9,
420:15, 427:4, 432:2,
465:24, 466:8
full-fledged [1] -
391:21
full-scale [12] -
337:4, 337:11,
339:23, 340:10,
351:11, 417:21,
417:22, 419:8,
419:20, 420:1, 420:9,
420:15
full-time [1] - 432:2
fully [2] - 367:7,
369:16
function [3] - 350:9,
374:8, 385:20
fundamental [2] -
333:16, 335:14
funds [1] - 359:22
Furman [4] - 447:19,
451:5, 451:9, 456:17

G

Gale [1] - 455:9
gaps [1] - 457:25
Gardens [1] - 309:13
gather [4] - 447:18,
449:5, 457:7, 459:11
gathered [2] -

450:25, 458:15
gatherer [1] - 447:12
gathering [4] -
447:16, 451:6, 464:20
General [1] - 309:4
general [5] - 348:11,
357:4, 357:13,
460:16, 461:17
Generally [1] -
353:19
girl [1] - 340:17
give-and-takes [1] -
324:21
given [7] - 311:23,
319:1, 352:1, 364:4,
370:22, 448:14,
465:20
Glades [1] - 365:5
global [1] - 468:3
globally [2] - 403:2,
411:18
glorified [1] - 341:10
goal [2] - 347:2,
457:14
goals [1] - 347:1
God [2] - 383:7,
431:4
Goodlette [2] -
308:14, 427:15
government [2] -
313:10, 314:2
governmental [1] -
345:15
governor [21] -
315:16, 316:2, 317:1,
318:10, 322:19,
331:11, 331:14,
332:15, 343:3,
344:20, 357:19,
360:5, 363:2, 363:22,
364:11, 364:17,
365:22, 372:19,
378:11, 378:19
Governor [8] - 309:2,
309:4, 314:10,
314:22, 328:21,
331:14, 378:16,
378:17
Governor's [4] -
381:4, 381:5, 451:19,
469:19
governor's [13] -
311:15, 313:8,
313:17, 317:12,
318:19, 318:23,
330:7, 330:17,
330:21, 331:25,
346:2, 348:5, 395:21
grade [1] - 461:23
graduate [2] -

391:13, 391:17
graduated [2] -
392:8, 392:16
graduating [1] -
391:19
grammatical [1] -
462:15
grant [1] - 359:15
Grant [3] - 338:22,
442:8, 443:25
grants [2] - 359:24,
360:2
great [3] - 315:3,
383:21, 419:6
greater [1] - 376:2
grief [1] - 365:15
grieve [1] - 364:25
grieving [1] - 365:10
grossly [1] - 469:15
ground [4] - 354:10,
354:11, 354:16, 359:7
grounds [1] - 434:10
group [5] - 323:20,
383:19, 383:25,
409:8, 441:1
grouped [1] - 441:2
groups [1] - 324:1
growing [1] - 464:15
Gualtieri [2] - 409:6,
410:20
guards [1] - 341:10
guess [2] - 410:5,
416:5
guessing [1] - 436:3
guidance [1] -
430:12
guidelines [1] -
394:20
gun [8] - 367:17,
379:5, 379:13, 415:3,
429:9, 429:14,
433:20, 440:17
gunfire [3] - 361:19,
429:10, 431:15
gunman [1] - 425:4
gunpoint [1] -
429:19
guns [3] - 377:16,
377:20, 429:21
gunshot [3] - 322:23,
429:8, 446:2
Gunzburger [1] -
357:8
guy [2] - 383:24,
450:4
guys [3] - 340:5,
415:3, 418:19

H

half [1] - 331:21
hall [2] - 376:16,
376:24
hand [4] - 350:1,
381:4, 421:19
handbook [1] - 375:1
handle [6] - 370:13,
382:9, 383:10, 384:3,
439:14, 439:16
handled [1] - 330:16
handling [1] - 370:7
hands [3] - 377:17,
429:15, 433:14
haphazardly [1] -
333:6
hard [3] - 328:24,
374:18, 375:4
harder [1] - 407:2
harm [1] - 467:24
hat [1] - 340:16
hate [1] - 469:23
hats [1] - 340:15
head [2] - 331:12,
363:25
headquarter [1] -
458:22
heads [1] - 452:20
healthy [1] - 346:20
hear [6] - 326:1,
347:10, 347:17,
354:19, 419:4, 444:4
heard [17] - 340:14,
343:24, 352:3,
353:12, 360:21,
368:22, 373:12,
387:19, 391:23,
392:17, 395:25,
405:8, 407:18,
421:25, 423:21,
431:19, 434:4
hearing [10] - 311:5,
311:8, 311:11,
311:22, 362:3,
419:10, 423:17,
429:3, 429:8, 469:7
HEARING [1] -
308:10
hears [1] - 431:15
heart [1] - 375:9
heck [1] - 418:13
held [2] - 420:15,
448:19
helicopter [1] -
337:18
helicopters [3] -
337:12, 371:11,
414:14
help [8] - 338:25,

339:18, 340:10,
346:23, 349:22,
358:25, 445:7
helps [2] - 349:6,
380:8
hero [1] - 362:6
herring [3] - 360:24,
361:16, 362:12
herself [1] - 322:12
hesitate [1] - 357:24
high [12] - 340:19,
340:24, 341:21,
343:9, 343:13,
345:10, 351:11,
354:9, 417:15,
435:15, 449:10
High [7] - 337:9,
338:5, 343:4, 414:6,
417:9, 420:1, 420:20
high-level [2] -
354:9, 449:10
higher [1] - 459:24
highjack [1] - 442:15
highlighted [14] -
330:12, 394:13,
400:9, 400:13,
400:23, 404:22,
407:12, 418:11,
427:21, 427:23,
430:15, 454:18,
455:1, 455:5
highlighting [1] -
467:15
highlights [1] -
453:19
highly [3] - 347:25,
456:9, 467:25
highly-trained [1] -
347:25
highway [1] - 359:2
himself [1] - 322:12
hire [3] - 387:2,
392:6, 393:16
hired [2] - 392:13,
394:22
Historically [1] -
468:2
hold [6] - 385:15,
417:14, 419:8,
429:18, 430:16,
430:23
hole [2] - 325:20,
342:5
Hollywood [7] -
318:6, 323:24, 324:5,
326:8, 329:7, 333:11,
371:15
home [2] - 361:12,
462:8
homeland [1] -

- 411:12
homicide [1] - 373:6
honestly [1] - 432:15
Honor [2] - 313:21,
 314:17
honor [2] - 366:22,
 366:23
Hook [1] - 413:19
hope [3] - 377:19,
 447:12, 464:8
horrific [3] - 373:17,
 411:24, 445:20
hospital [2] - 374:21,
 394:15
hospitals [1] -
 322:23
host [1] - 419:15
hostage [3] - 415:12,
 416:15, 442:4
Hostage [1] - 415:17
hostages [1] -
 322:13
hosted [1] - 329:23
hour [4] - 331:21,
 416:7, 428:22, 470:6
hours [3] - 331:22,
 388:21, 388:24
house [1] - 365:3
human [5] - 348:12,
 375:6, 375:16,
 375:17, 389:6
Human [1] - 389:7
humanly [1] - 362:1
humans [1] - 375:7
hundreds [6] -
 360:24, 360:25,
 362:21, 362:22,
 373:1, 373:2
hurt [1] - 431:11
husband [1] - 384:19
hypothetical [2] -
 436:22, 438:23
hypotheticals [1] -
 436:20
-
- I**
-
- idea** [7] - 328:19,
 369:9, 416:23,
 425:18, 444:11,
 459:9, 463:4
identifies [1] -
 330:22
identify [1] - 313:24
ifs [1] - 325:6
II [1] - 311:2
III [1] - 308:7
ill [1] - 440:5
ill-advised [1] -
 440:5
- illness** [2] - 377:19,
 377:21
imagine [1] - 434:23
immediate [2] -
 325:5, 369:10
immediately [4] -
 344:22, 348:16, 352:8
immensely [1] -
 468:3
impart [1] - 377:1
imparted [1] - 336:3
imperfect [1] - 375:7
implement [2] -
 370:12, 396:7
implementation [2] -
 352:25, 467:3
implemented [5] -
 339:24, 360:10,
 371:23, 398:12, 410:9
implements [1] -
 396:2
imply [1] - 421:4
importance [4] -
 330:2, 340:11,
 345:19, 448:12
important [18] -
 321:4, 324:18, 326:1,
 327:9, 333:15,
 340:16, 344:23,
 370:3, 376:25, 392:4,
 392:5, 392:6, 402:1,
 406:9, 417:23, 429:2,
 456:9, 464:18
imposed [1] - 381:18
impossibility [1] -
 401:17
impossible [1] -
 369:3
improvement [11] -
 453:11, 454:12,
 457:15, 462:6,
 462:25, 463:4,
 463:21, 465:10,
 467:1, 468:6, 468:12
Improvement [1] -
 467:19
improvements [1] -
 345:7
IN [1] - 308:3
inadequate [1] -
 363:23
inaudible [3] -
 372:15, 411:24,
 435:23
Inc [1] - 308:23
incident [33] - 321:6,
 322:4, 326:9, 327:23,
 327:25, 328:3,
 328:17, 329:4, 329:5,
 329:7, 329:12, 330:1,
 343:5, 344:10,
 352:22, 365:18,
 365:19, 367:21,
 367:25, 368:2,
 368:15, 369:17,
 370:16, 383:22,
 445:20, 446:19,
 458:16, 458:22,
 463:7, 465:23,
 466:15, 469:3, 469:5
incidents [3] - 336:8,
 341:7, 365:17
include [9] - 354:3,
 354:9, 354:21,
 425:14, 443:1, 443:7,
 443:9, 443:10
included [5] - 328:6,
 406:1, 414:23,
 456:19, 466:25
includes [4] -
 318:22, 387:17,
 401:4, 425:20
including [6] -
 320:24, 338:10,
 349:8, 350:18, 351:3,
 452:19
inclusion [1] -
 447:24
incompetence [2] -
 330:9, 364:12
incompetent [3] -
 318:11, 331:17,
 357:20
Inconsistent [1] -
 356:1
inconsistent [2] -
 362:16, 362:19
incorrect [1] -
 447:11
increased [2] -
 411:5, 413:4
increasing [6] -
 412:5, 412:8, 412:23,
 413:1, 413:3, 413:5
increasingly [2] -
 411:19, 412:24
incredible [3] -
 337:17, 337:22, 418:2
incredibly [1] -
 374:23
indelible [1] - 365:8
independently [3] -
 317:1, 317:9, 317:14
independently-
elected [3] - 317:1,
 317:9, 317:14
INDEX [1] - 310:1
indicate [1] - 421:3
indicates [1] -
 348:22
- indication** [2] -
 430:5, 470:4
indicative [1] - 433:2
individual [12] -
 321:22, 336:25,
 361:23, 369:10,
 369:11, 390:1,
 405:16, 405:18,
 421:13, 450:9, 459:10
individually [1] -
 369:1
individuals [7] -
 377:5, 412:6, 428:2,
 433:13, 449:22,
 453:6, 463:21
industry [4] - 359:18,
 398:17, 398:21,
 408:20
influence [3] - 315:2,
 315:21, 316:3
influenced [1] -
 360:19
inform [1] - 383:5
Inform [1] - 376:14
information [19] -
 324:19, 326:14,
 361:10, 368:11,
 369:10, 369:14,
 369:22, 369:23,
 370:22, 373:15,
 377:1, 382:6, 382:7,
 439:11, 441:3,
 455:25, 456:15,
 458:15, 468:14
informing [1] -
 381:17
ingredients [6] -
 447:14, 448:9, 449:5,
 450:12, 457:7, 459:11
initial [6] - 318:25,
 319:6, 319:9, 319:18,
 416:14, 461:5
initiated [1] - 353:6
initiatives [1] - 452:4
injured [1] - 337:14
innocents [1] -
 431:10
input [5] - 328:7,
 334:14, 354:17,
 356:15, 406:3
inside [2] - 348:8,
 361:4
Instagram [1] -
 367:17
Instead [1] - 420:12
instead [2] - 351:6,
 422:17
instituted [3] -
 336:22, 371:23,
 379:16
- institution** [1] -
 362:25
instruction [3] -
 425:24, 430:12,
 432:21
instructions [1] -
 425:23
instructor [4] -
 430:1, 430:6, 430:11,
 431:13
instructors [2] -
 425:16, 425:17
Instructors [1] -
 430:3
insufficient [1] -
 363:24
intell [4] - 362:2,
 429:12, 430:21,
 442:14
intelligence [3] -
 344:4, 407:13, 447:25
intend [1] - 384:23
intended [1] - 375:13
intending [1] - 367:2
interact [1] - 444:22
interaction [1] -
 452:15
interactions [4] -
 364:14, 364:17,
 365:19, 365:20
interested [1] - 436:3
interesting [1] -
 313:10
interfere [1] - 315:20
intermittently [1] -
 429:9
Internal [2] - 449:7,
 449:8
international [1] -
 405:19
International [2] -
 319:3, 405:9
interpretation [1] -
 400:6
interpreting [1] -
 400:7
interrupt [3] - 315:1,
 401:20, 469:23
interview [7] - 342:8,
 378:1, 381:6, 381:9,
 381:16, 383:12,
 383:16
interviewed [1] -
 312:25
interviews [1] -
 450:3
introduction [1] -
 406:13
introductions [2] -
 423:24, 424:13

inventory [1] - 342:18
investigated [1] - 331:6
investigation [2] - 312:22, 382:9
investigations [5] - 350:9, 372:16, 389:6, 452:25, 453:1
investigative [2] - 313:1, 349:12
invite [1] - 341:23
invited [2] - 324:7, 329:19
involve [1] - 365:25
involved [15] - 345:10, 345:12, 345:13, 345:17, 345:21, 345:25, 346:1, 366:5, 406:7, 414:15, 442:4, 463:11, 463:12, 463:16
involvement [3] - 338:10, 353:16, 354:3
involving [2] - 357:11, 373:24
Israel [40] - 308:3, 309:7, 311:7, 311:9, 312:3, 313:17, 313:21, 314:7, 314:14, 314:23, 315:4, 317:3, 317:4, 317:12, 320:11, 327:7, 330:12, 330:15, 331:2, 338:2, 338:3, 345:1, 350:2, 350:3, 353:15, 366:16, 380:15, 380:16, 380:17, 385:15, 404:25, 406:19, 406:20, 423:6, 426:25, 428:9
ISRAEL [1] - 310:4
Israel's [3] - 311:16, 312:19, 341:2
issue [9] - 325:18, 326:10, 326:11, 375:5, 375:12, 378:6, 396:11, 426:24, 445:7
issued [2] - 451:20, 465:24
issues [11] - 326:17, 336:7, 344:16, 349:7, 350:18, 373:17, 396:25, 462:15, 464:7, 467:8
item [1] - 312:9
itself [1] - 332:3
IV [1] - 470:10

J

Jack [2] - 324:6, 324:11
Jake [1] - 381:6
January [8] - 328:1, 336:19, 336:20, 336:22, 345:2, 350:5, 451:24
Jersey [1] - 458:9
JESSICA [3] - 308:22, 471:5, 471:15
job [9] - 323:17, 337:22, 342:10, 342:11, 349:16, 375:21, 376:12, 392:14, 393:15
jobs [5] - 393:17, 431:25, 440:3, 449:19, 465:6
JOHN [1] - 309:3
join [2] - 405:16, 405:19
judge [2] - 383:21, 383:22
jumbling [1] - 402:19
jump [1] - 312:4
June [4] - 308:11, 311:4, 465:22, 471:11
jurisdiction [1] - 324:17
Justice [2] - 355:5, 387:22
justice [2] - 315:12, 315:13
juvenile [1] - 389:5

K

K-9 [3] - 337:17, 337:19, 414:17
KAPLAN [5] - 309:11, 312:12, 312:14, 316:6, 401:19
Kaplan [3] - 309:12, 312:13, 316:13
Keep [1] - 454:15
keep [3] - 427:13, 445:23, 463:15
keeping [1] - 434:10
kept [3] - 364:8, 434:12, 462:25
kids [9] - 340:18, 340:21, 341:17, 346:23, 361:11, 363:25, 365:4, 365:11, 384:19
kill [1] - 369:7
killed [2] - 362:8, 440:17

killer [15] - 322:14, 322:16, 335:2, 337:16, 337:19, 367:12, 382:17, 382:22, 398:19, 418:7, 430:25, 431:1, 440:14, 440:15, 443:12
killer's [1] - 344:1
killing [4] - 321:18, 430:19, 430:20, 446:11
kind [5] - 321:20, 328:10, 346:22, 377:3, 441:3
Kinsey [4] - 461:15, 466:19, 468:5, 469:2
kits [2] - 394:10, 394:14
Kits [1] - 394:11
knee [2] - 445:9, 445:10
knowledge [13] - 319:9, 325:14, 339:8, 348:17, 348:19, 348:23, 377:23, 388:18, 388:22, 443:3, 444:19, 444:21, 446:25
known [3] - 314:12, 377:22, 440:7
knows [4] - 445:13, 450:5, 450:6
KUEHNE [12] - 309:8, 312:8, 317:23, 318:3, 318:18, 329:3, 385:3, 401:6, 413:9, 427:6, 436:23, 464:23
Kuehne [7] - 309:8, 310:4, 315:4, 317:22, 318:15, 322:7, 427:1

L

lack [1] - 348:23
laissez [1] - 341:6
laissez-faire [1] - 341:6
lane [1] - 331:9
language [1] - 355:21
large [14] - 339:12, 351:22, 359:11, 369:4, 408:23, 411:13, 417:15, 418:14, 418:24, 424:9, 431:23, 435:4, 444:13, 444:23
large-scale [6] - 339:12, 351:22,

417:15, 418:14, 444:13, 444:23
larger [3] - 323:20, 426:9, 429:5
last [8] - 314:17, 314:22, 318:4, 342:7, 400:22, 430:14, 439:23, 462:11
Lauderdale [18] - 318:6, 323:23, 323:24, 324:5, 325:23, 326:8, 329:7, 333:11, 333:12, 371:15, 374:16, 433:12, 444:9, 452:14, 454:20, 458:3, 465:16, 466:14
Lauderdale-
Hollywood [7] - 318:6, 323:24, 324:5, 326:8, 329:7, 333:11, 371:15
law [74] - 311:13, 315:9, 323:6, 323:14, 323:20, 324:4, 326:4, 329:11, 331:3, 333:15, 333:16, 335:9, 339:14, 339:16, 339:21, 340:3, 340:6, 343:8, 346:23, 347:2, 347:22, 349:7, 349:11, 349:23, 350:9, 354:22, 355:23, 356:10, 356:12, 357:11, 359:6, 359:11, 360:10, 362:22, 363:18, 366:23, 366:25, 371:2, 371:3, 374:7, 382:1, 388:19, 389:16, 390:1, 391:6, 391:13, 392:18, 393:12, 395:8, 396:12, 403:16, 405:1, 411:18, 413:22, 414:2, 419:4, 434:6, 434:18, 434:22, 435:5, 435:12, 435:17, 436:5, 436:11, 436:14, 437:4, 437:10, 438:3, 439:9, 441:1, 444:10, 450:1, 450:4, 450:20
Law [8] - 309:8, 351:19, 363:20, 373:9, 389:19, 391:6, 405:3, 453:2
lawyers [1] - 361:14
lax [1] - 351:2

LAX [1] - 441:6
lead [1] - 447:8
leader [8] - 327:12, 348:10, 383:24, 390:25, 391:22, 447:9, 448:13, 463:19
leader's [1] - 469:10
leaders [6] - 341:20, 373:7, 383:25, 445:21, 445:22, 446:18
leadership [4] - 330:14, 331:2, 345:21, 383:17
leading [2] - 345:6, 444:9
leap [2] - 424:22, 425:1
leap-frog [2] - 424:22, 425:1
learn [14] - 320:12, 321:13, 321:15, 321:24, 323:13, 370:16, 371:14, 371:18, 378:1, 441:4, 441:15, 457:20, 458:16, 462:4
learned [16] - 321:10, 322:5, 324:15, 325:22, 355:12, 418:3, 437:19, 444:8, 446:23, 447:5, 457:10, 457:15, 457:22, 458:3, 458:10, 467:11
learning [3] - 324:23, 423:2, 457:9
least [12] - 329:16, 379:10, 390:14, 397:17, 402:18, 411:4, 411:17, 412:3, 456:21, 457:6, 457:23, 470:6
leave [1] - 396:15
leaves [3] - 359:7, 359:8, 397:7
led [4] - 351:2, 357:22, 367:4, 370:22
left [4] - 331:19, 344:21, 386:11, 386:12
legal [3] - 344:16, 357:10, 463:18
legally [1] - 440:17
legislation [1] - 359:10
legislature [4] - 393:11, 394:5, 394:6, 395:8
legislature's [1] -

- 395:23
legitimate [1] - 427:10
less [4] - 326:10, 439:13, 439:25, 440:1
lessened [1] - 467:23
lesson [4] - 325:22, 325:25, 423:7, 467:2
lessons [10] - 321:9, 324:15, 418:3, 441:16, 446:23, 447:4, 457:10, 457:15, 458:3
lethal [1] - 361:22
letting [1] - 325:17
level [12] - 313:11, 313:12, 319:15, 345:10, 346:12, 354:9, 368:1, 406:9, 448:6, 449:10, 463:9
levels [1] - 345:11
library [1] - 443:11
lieu [1] - 347:22
Lieutenant [5] - 337:1, 339:19, 339:25, 447:19, 451:5
lieutenant [6] - 320:22, 447:20, 448:22, 448:24, 463:10, 464:6
lieutenants [1] - 468:24
life [9] - 339:12, 362:3, 362:5, 407:15, 419:8, 419:20, 420:15, 440:3, 445:6
life-threatening [3] - 362:3, 362:5, 445:6
likely [3] - 342:13, 352:21, 411:2
limit [2] - 343:17, 347:3
limited [2] - 411:14, 427:17
limiting [1] - 433:9
line [6] - 356:3, 358:13, 408:20, 430:15, 442:22, 466:18
lines [2] - 328:16, 409:25
link [1] - 368:5
list [5] - 342:7, 388:5, 388:6, 405:4
listed [2] - 467:1, 469:19
listening [2] - 383:18, 386:21
lists [1] - 377:18
- literature** [1] - 354:22
live [1] - 365:3
lived [1] - 322:24
lives [7] - 321:25, 322:18, 337:2, 364:23, 365:1, 394:15, 433:14
Lives [1] - 364:25
LLP [1] - 309:12
loaded [1] - 440:17
local [3] - 313:12, 454:21, 455:12
location [3] - 334:12, 382:22, 443:13
LOCATION [1] - 308:12
locations [1] - 329:18
locker [1] - 462:9
Loesch [1] - 376:21
log [2] - 420:24, 421:1
logical [5] - 370:4, 390:15, 447:3, 461:1, 461:24
logically [1] - 446:3
look [26] - 315:9, 328:13, 338:2, 342:2, 342:4, 344:25, 355:17, 368:10, 382:17, 423:12, 429:23, 430:6, 435:1, 435:4, 435:10, 450:10, 452:11, 460:17, 460:23, 460:25, 461:4, 461:17, 462:14, 463:1, 466:7, 469:9
looked [6] - 328:20, 339:13, 348:21, 355:15, 355:16, 460:1, 460:21, 462:20
looking [6] - 342:12, 342:14, 343:22, 372:24, 403:25, 450:5
looks [1] - 456:22
Los [2] - 319:3, 320:12
lost [2] - 364:23, 433:14
loud [1] - 455:3
low [2] - 382:5, 448:6
low-level [1] - 448:6
-
- M**
-
- MacIver** [1] - 385:7
MACIVER [2] - 309:3, 440:20
- Madam** [1] - 423:16
made-up [1] - 382:11
Madrigal [3] - 371:14, 433:20, 433:23
magic [1] - 356:20
Magistrate [1] - 436:1
magnitude [1] - 328:2
Mahan [1] - 308:23
mail [3] - 309:6, 309:10, 309:14
mailed [1] - 421:13
main [1] - 325:13
maintained [1] - 434:11
Major [55] - 324:7, 338:18, 338:19, 420:5, 420:6, 442:8, 443:25, 447:7, 448:5, 448:8, 449:25, 450:7, 450:16, 450:19, 451:4, 451:12, 451:20, 452:8, 452:13, 452:18, 453:15, 453:21, 454:5, 454:8, 454:15, 454:18, 455:6, 455:7, 455:19, 456:3, 456:16, 456:22, 457:1, 457:24, 458:19, 458:25, 459:25, 460:17, 460:23, 461:4, 461:5, 461:23, 462:25, 463:5, 464:20, 464:22, 465:21, 466:9, 466:24, 467:15, 468:8, 468:13, 469:8
major [14] - 324:16, 338:17, 352:22, 412:10, 441:1, 441:14, 442:8, 448:10, 448:24, 449:5, 450:21, 456:18, 463:17, 468:18
major's [1] - 460:25
majors [2] - 320:23, 464:5
maker [2] - 315:2, 386:9
makers [1] - 315:21
males [1] - 415:2
man [9] - 348:7, 424:19, 425:13, 425:19, 425:21, 426:11, 428:4, 428:13, 469:14
manage [1] - 470:1
management [2] - 452:15, 458:23
manager [1] - 445:13
managerial [1] - 449:15
mandate [5] - 359:20, 359:21, 398:18, 403:11, 421:22
mandated [2] - 393:25, 394:3
mandatory [1] - 397:25
manner [4] - 325:17, 326:14, 331:7, 406:24
manpower [1] - 396:24
mantra [1] - 356:20
March [6] - 452:18, 453:3, 454:8, 454:15, 455:7, 456:16
Marjory [25] - 322:8, 333:18, 333:25, 334:18, 335:21, 343:4, 346:3, 350:24, 351:3, 357:17, 371:13, 371:16, 371:24, 372:3, 372:6, 373:24, 376:1, 376:15, 381:8, 381:21, 382:16, 394:8, 407:24, 409:1, 409:7
Mark [1] - 455:9
marked [1] - 380:16
mass [7] - 334:19, 340:23, 411:20, 412:6, 444:13, 457:25, 464:15
massacre [5] - 350:24, 371:24, 374:24, 382:8, 413:20
Master [13] - 308:14, 312:8, 312:12, 360:21, 363:3, 385:12, 388:8, 401:19, 406:22, 427:15, 436:21, 440:20, 469:18
MASTER [26] - 311:3, 312:7, 312:11, 312:13, 315:25, 316:8, 317:18, 317:24, 318:15, 328:23, 329:2, 385:4, 385:10, 401:7, 401:21, 406:25, 407:2, 413:10, 424:4, 427:7, 427:20, 436:24, 440:22, 464:25, 469:22, 470:7
Masters [4] - 312:15, 313:2, 313:8, 313:16
material [1] - 339:17
materials [1] - 329:5
Matter [1] - 356:14
matter [9] - 311:10, 321:18, 321:19, 328:7, 336:10, 348:5, 367:19, 373:14, 386:18
matters [2] - 357:11, 370:9
mean [27] - 342:10, 366:22, 370:6, 373:11, 374:21, 377:14, 388:25, 398:2, 401:19, 411:22, 412:4, 412:9, 412:25, 417:22, 419:12, 427:19, 430:17, 432:17, 439:11, 440:1, 455:17, 456:12, 458:13, 462:1, 467:9, 468:20, 468:25
Meaning [3] - 386:3, 386:11, 386:14
meaning [4] - 354:22, 390:25, 406:14, 422:12
means [10] - 352:17, 370:8, 379:20, 387:1, 390:4, 411:10, 425:21, 425:22, 429:20, 430:18
meant [4] - 364:22, 399:21, 448:4, 448:5
measures [1] - 394:24
media [3] - 317:5, 373:1, 373:2
meet [3] - 452:9, 454:16, 456:17
meeting [8] - 337:3, 376:16, 376:25, 384:17, 437:9, 454:19, 455:7, 458:22
Meetings [1] - 451:22
meetings [5] - 319:15, 324:21, 325:3, 451:16, 459:1
meets [3] - 451:24, 452:14, 454:9
member [10] - 316:10, 360:6, 360:9, 386:21, 403:16,

- 404:10, 405:14,
445:9, 456:9, 458:2
members [9] -
324:13, 337:13,
380:5, 380:6, 405:16,
405:18, 456:10,
457:9, 459:14
memo [1] - 344:21
memorandum [9] -
318:19, 330:7,
330:18, 330:21,
331:25, 346:2, 363:2,
400:3
memory [1] - 389:2
men [7] - 321:14,
340:14, 341:18,
345:23, 383:20,
464:5, 469:10
mental [2] - 377:19,
377:21
mention [1] - 402:1
mentioned [10] -
323:10, 323:22,
326:19, 331:24,
351:14, 364:3,
371:10, 379:7,
387:14, 440:25
merits [1] - 314:8
message [3] -
325:14, 340:22,
356:24
met [2] - 335:20,
458:21
methodology [1] -
444:3
Miami [4] - 309:9,
390:8, 390:16, 456:17
Miami-Dade [3] -
390:8, 390:16, 456:17
Michael [1] - 337:1
microphone [2] -
318:16, 424:5
middle [1] - 341:21
Middle [1] - 365:5
might [25] - 320:18,
329:17, 334:25,
342:9, 382:6, 383:6,
389:1, 390:6, 390:8,
396:17, 407:1, 420:2,
427:22, 430:8,
431:13, 431:25,
434:17, 435:5,
439:13, 439:14,
442:5, 455:17,
461:14, 468:13, 470:5
Mike [2] - 337:2,
337:4
military [1] - 346:16
million [1] - 464:2
mind [3] - 365:8,
433:1, 453:25
minded [1] - 342:11
minds [2] - 351:25,
412:11
minimum [6] -
389:15, 392:1, 395:4,
418:22, 440:5, 440:6
minimums [1] -
391:11
Minnesota [1] -
440:16
minutes [11] - 344:5,
377:10, 385:7,
423:23, 424:12,
424:15, 424:18,
425:5, 425:11, 462:11
mishear [1] - 433:7
mission [2] - 361:3,
445:23
missions [1] -
456:20
mistake [1] - 467:23
mistrial [1] - 314:1
mitigated [2] -
330:15, 331:6
mobile [1] - 393:20
model [4] - 355:21,
380:2, 380:23, 403:19
moderator [1] -
383:6
moment [2] - 312:10,
433:13
money [1] - 359:16
monitor [1] - 392:11
Monroe [1] - 308:13
month [3] - 337:7,
350:23, 420:10
months [6] - 314:9,
337:9, 362:7, 397:24,
414:11, 465:4
Montreal [1] - 329:20
Morale [1] - 382:5
morning [9] - 311:3,
311:9, 312:15,
312:17, 318:4, 394:7,
444:5, 463:19, 465:3
Most [1] - 408:22
most [10] - 324:15,
333:16, 337:10,
340:16, 342:13,
354:25, 392:4, 392:5,
392:6, 408:22
motivated [1] - 314:8
Move [2] - 413:9,
436:23
move [6] - 325:21,
425:3, 427:13,
429:10, 443:15
moved [1] - 442:11
movements [3] -
344:2, 423:2, 443:14
moving [5] - 407:11,
427:14, 431:1, 431:2
MR [41] - 312:8,
312:12, 312:14,
316:6, 316:9, 317:23,
318:3, 318:18, 329:3,
385:3, 385:12,
385:14, 401:6, 401:8,
401:9, 401:19,
401:22, 401:23,
407:1, 407:8, 413:9,
413:11, 423:16,
423:19, 423:22,
424:3, 424:8, 427:6,
427:11, 427:15,
428:1, 428:6, 436:23,
436:25, 437:1,
440:20, 440:24,
464:23, 465:14,
469:17, 470:6
MSD [1] - 365:15
multi [2] - 418:14,
446:8
multi-agency [1] -
418:14
multi-faceted [1] -
446:8
multiple [4] - 414:20,
416:2, 425:1, 426:21
municipality [10] -
434:17, 434:21,
435:1, 435:8, 435:11,
435:14, 435:18,
436:6, 436:7, 436:8
murderer [1] - 431:7
must [4] - 362:5,
398:16, 419:11,
467:20
-
- N**
-
- name** [3] - 368:4,
368:22, 378:9
nation [2] - 408:21,
417:24
national [10] -
323:25, 324:16,
329:11, 354:6,
362:17, 362:19,
362:20, 363:13,
382:13, 396:11
National [2] - 324:9,
376:19
**national/
international** [2] -
454:22, 455:13
nationally [2] -
325:18, 418:12
nature [3] - 345:19,
367:24, 375:16
Navy [1] - 347:13
near [1] - 454:1
necessarily [8] -
390:15, 391:15,
396:10, 403:22,
411:22, 432:12,
450:16, 467:13
necessary [4] -
395:13, 396:3,
440:10, 451:2
necessity [1] - 433:4
need [25] - 319:4,
321:2, 321:3, 345:25,
346:1, 375:25,
380:18, 383:10,
390:10, 390:12,
393:8, 393:11,
396:22, 396:23,
419:11, 423:3, 424:4,
445:8, 445:9, 445:16,
446:21, 455:22,
458:16, 464:4, 464:7
needed [15] - 322:25,
344:6, 358:24,
358:25, 374:20,
393:22, 444:17,
445:1, 445:5, 445:24,
446:10, 446:14,
453:24, 467:12,
467:25
needs [7] - 325:12,
325:19, 336:3,
387:20, 395:9, 414:2,
445:9
neglect [5] - 330:8,
364:12, 402:11,
402:23
neglected [1] -
357:19
negligent [1] -
318:11
negotiation [3] -
345:6, 437:16, 438:19
negotiations [2] -
345:14, 437:14
negotiators [3] -
415:17, 416:15, 442:4
Nelson [1] - 377:3
networks [1] -
382:14
neutralize [1] - 431:3
Never [3] - 359:8,
364:6, 442:25
never [28] - 322:19,
328:11, 328:12,
330:11, 332:17,
341:8, 351:14, 359:7,
362:18, 364:3,
364:18, 365:7, 365:9,
367:12, 368:22,
370:20, 382:24,
382:25, 390:13,
419:12, 419:13,
420:15, 437:5, 437:6,
437:9, 459:6, 462:6,
462:20
New [5] - 315:6,
392:22, 458:7, 458:8
new [5] - 391:13,
392:25, 404:6,
404:17, 407:9
newer [1] - 450:1
newly [2] - 392:13,
392:16
newly-graduated [1]
- 392:16
newly-hired [1] -
392:13
news [3] - 373:1,
373:2, 382:14
newsletter [1] -
338:4
next [11] - 321:12,
321:16, 326:24,
327:11, 383:8,
424:15, 446:20,
461:1, 461:24, 462:12
NICHOLAS [1] -
309:3
**nicholas.primrose
@eog.myflorida.com**
[1] - 309:6
night [2] - 314:23,
318:5
night's [1] - 314:18
Nightclub [1] -
321:12
NIMS [6] - 379:17,
380:6, 380:19,
380:23, 380:24
no-fly [1] - 377:18
nobody [3] - 356:14,
430:22, 462:8
Nobody [1] - 382:8
nobody's [1] -
450:24
non [3] - 335:9,
440:3, 462:16
non-law [1] - 335:9
**non-life-
threatening** [1] -
440:3
non-pragmatic [1] -
462:16
none [2] - 404:16,
404:21
None [1] - 356:9
nonetheless [1] -
335:16

nonresponsive [1] - 440:21
normal [4] - 326:20, 397:19, 446:12, 446:17
normally [1] - 397:5
Note [1] - 369:13
note [4] - 315:23, 367:22, 368:8, 368:12
notes [2] - 368:1, 471:9
Nothing [3] - 339:6, 360:12, 360:13
nothing [6] - 367:14, 370:17, 430:24, 450:9, 450:11, 469:13
noticed [1] - 414:5
notions [1] - 342:6
notorious [1] - 323:5
Notwithstanding [2] - 314:5, 314:17
notwithstanding [1] - 314:18
November [8] - 319:2, 327:24, 327:25, 328:1, 336:14, 368:19, 369:5, 369:22
NRA [5] - 377:8, 377:12, 378:25, 379:3, 379:11
number [6] - 318:9, 333:22, 412:17, 432:5, 432:14, 440:6
NUMBER [1] - 308:3
numbers [1] - 411:13

O

Oaks [1] - 362:6
oath [3] - 312:5, 316:16, 317:25
Objection [3] - 401:6, 427:6, 464:23
obligated [1] - 348:3
observation [2] - 332:12, 455:7
observations [7] - 318:9, 331:23, 453:7, 454:11, 456:6, 456:8, 459:9
observers [1] - 338:1
obstacle [1] - 331:19
obstacles [2] - 332:6, 332:21
obtained [1] - 380:1
Obviously [1] - 314:5
obviously [1] - 312:17

occasion [1] - 358:20
occur [2] - 400:25, 401:5
occurred [7] - 319:2, 344:10, 364:18, 379:15, 406:16, 414:7, 414:9
occurrence [1] - 350:21
occurs [1] - 385:20
October [7] - 327:24, 328:22, 406:21, 407:11, 408:17, 465:24, 469:6
OF [7] - 308:3, 308:9, 308:10, 308:10, 309:1, 310:1, 471:1
offender [1] - 389:5
offense [4] - 327:23, 328:3, 367:9, 370:23
offense/incident [1] - 368:5
Offer [1] - 342:21
offered [1] - 379:11
office [25] - 317:3, 317:7, 317:12, 321:9, 331:15, 340:1, 344:21, 358:17, 370:8, 379:1, 379:23, 380:4, 380:10, 385:18, 385:23, 395:17, 403:12, 405:13, 409:5, 410:10, 414:12, 434:15, 434:17, 449:1
Office [29] - 308:12, 309:4, 320:20, 335:13, 357:5, 360:1, 370:17, 371:9, 371:20, 374:16, 379:16, 385:21, 386:4, 386:8, 392:20, 394:17, 396:19, 406:15, 415:24, 417:3, 418:14, 420:14, 431:18, 434:6, 434:21, 448:10, 448:16, 458:14, 469:16
officer [28] - 319:7, 333:23, 334:3, 334:6, 334:8, 335:2, 347:23, 358:24, 359:3, 359:6, 361:3, 361:5, 388:20, 389:16, 390:5, 391:7, 392:10, 392:14, 393:2, 398:2, 408:10, 416:13, 416:18, 417:2, 439:18,

439:19, 450:2
officers [27] - 322:21, 333:12, 339:14, 339:16, 351:17, 354:10, 354:11, 360:16, 366:6, 367:5, 370:13, 373:3, 374:15, 382:1, 390:12, 391:25, 392:17, 392:22, 393:19, 394:17, 396:16, 398:4, 398:13, 399:7, 415:25, 416:24, 433:10
offices [3] - 323:14, 339:17, 355:10
official [4] - 317:2, 317:17, 319:19, 338:25
often [8] - 396:14, 396:21, 399:1, 419:7, 419:9, 419:11, 433:9, 439:16
once [8] - 320:4, 327:18, 347:7, 368:10, 398:19, 399:8, 412:21, 422:11
One [12] - 322:19, 323:22, 333:16, 343:24, 345:1, 347:5, 354:12, 378:14, 378:15, 403:2, 415:3, 415:11
one [76] - 312:8, 312:16, 313:1, 322:10, 324:10, 329:20, 329:21, 331:10, 333:25, 336:1, 336:21, 337:10, 338:14, 339:25, 340:4, 343:14, 345:1, 347:6, 349:19, 349:20, 351:16, 362:24, 365:24, 367:8, 367:25, 373:7, 374:23, 378:6, 378:7, 378:8, 381:2, 382:12, 382:13, 383:5, 383:14, 383:15, 383:21, 383:22, 386:14, 389:1, 390:6, 390:7, 404:2, 409:8, 412:10, 412:14, 415:3, 415:20, 415:22, 416:4, 416:7, 416:13, 419:14, 422:5, 422:6, 428:16, 432:21, 435:16,

437:23, 444:1, 450:12, 455:1, 455:20, 456:10, 461:8, 464:15, 465:20, 466:13, 466:15, 467:4, 467:18, 468:12, 469:15
one-day [1] - 415:22
one-hour [1] - 416:7
one-on-one [1] - 432:21
ones [2] - 358:9, 389:12
open [5] - 314:19, 316:25, 342:11, 362:6, 445:23
open-minded [1] - 342:11
opened [1] - 375:23
opening [3] - 313:9, 399:19, 401:3
oper [1] - 441:19
operating [1] - 406:16
operation [7] - 342:24, 346:16, 373:5, 373:24, 434:9, 456:21, 462:6
Operation [2] - 441:20, 443:21
operations [5] - 372:13, 373:10, 374:12, 446:13, 462:7
opinion [10] - 390:24, 450:24, 454:19, 455:20, 468:8, 468:9, 468:14, 468:16, 468:18
opinions [9] - 317:16, 377:22, 450:10, 450:16, 450:19, 451:1, 456:8, 458:15, 464:21
opportunities [1] - 397:17
opportunity [6] - 311:24, 314:20, 317:4, 364:4, 427:8, 448:4
opposite [3] - 329:15, 341:12, 376:18
ORDER [2] - 308:3, 308:10
Order [1] - 311:6
order [2] - 311:21, 319:17
ordered [2] - 402:20, 435:25

orders [1] - 367:11
ordinance [1] - 343:12
ordinarily [1] - 371:1
ordinary [2] - 323:17, 370:7
organization [3] - 403:9, 403:13, 405:12
organizations [3] - 324:4, 330:5, 403:1
organize [2] - 338:13, 338:15
orthopedic [1] - 445:11
ouster [1] - 379:1
outline [1] - 456:20
outs [1] - 328:16
outside [4] - 356:12, 431:6, 436:9, 436:15
outsourcing [1] - 434:22
outward [1] - 458:14
outward-facing [1] - 458:14
overall [3] - 338:20, 338:21, 342:17
overcome [2] - 332:7, 332:22
oversee [1] - 370:11
oversight [1] - 379:19
overt [1] - 314:16
overwatch [5] - 424:19, 424:21, 425:13, 425:19, 425:21
own [8] - 336:6, 337:20, 349:17, 356:19, 360:23, 377:7, 450:24
ownership [1] - 379:14

P

P.A [1] - 309:8
p.m [1] - 308:12
page [7] - 318:24, 330:9, 350:2, 350:3, 380:16, 406:20, 437:15
PAGE [2] - 310:3, 310:7
pages [2] - 308:8, 466:16
paid [1] - 405:18
Palm [7] - 309:13, 369:9, 370:16, 370:25, 371:4, 371:7, 371:8

- paper** [1] - 421:12
paramedics [1] - 322:22
parents [1] - 372:24
park [1] - 331:20
Parker [1] - 309:12
Parkland [1] - 365:5
part [36] - 317:20, 320:17, 323:17, 329:5, 330:11, 330:17, 333:10, 333:15, 337:12, 342:16, 349:10, 351:1, 351:6, 353:22, 357:22, 358:12, 363:4, 366:1, 375:21, 376:11, 376:24, 377:6, 379:19, 381:16, 400:10, 403:12, 420:20, 427:10, 429:2, 437:16, 443:6, 449:14, 449:15, 454:19, 461:25
participant [1] - 357:5
participants [1] - 324:22
participate [2] - 324:3, 416:19
participated [2] - 415:25, 417:6
participation [1] - 349:3
particular [2] - 343:24, 405:13
particularly [1] - 320:20
parties [3] - 311:12, 311:17, 311:23
partner [1] - 467:5
partners [1] - 331:5
parts [1] - 333:16
pass [2] - 393:12, 395:8
passed [1] - 343:8
passengers [1] - 443:23
passing [1] - 429:10
past [1] - 412:24
pat [1] - 429:20
patently [2] - 454:6, 456:4
patrol [4] - 358:21, 406:3, 406:6, 448:21
pay [7] - 403:16, 403:23, 435:16, 438:11, 438:12, 438:15, 438:20
paying [2] - 403:19, 404:9
PD [1] - 452:14
peace [5] - 336:11, 376:12, 399:21, 400:11, 401:4
Pennsylvania [1] - 446:9
Pentagon [1] - 446:8
people [52] - 321:2, 325:8, 325:20, 333:3, 333:6, 335:20, 338:10, 341:20, 347:14, 351:21, 362:14, 365:2, 369:2, 369:7, 372:24, 375:4, 375:7, 375:14, 375:18, 377:17, 377:18, 380:20, 383:3, 384:1, 384:9, 384:17, 384:24, 392:6, 392:7, 400:16, 400:21, 411:14, 411:20, 411:24, 411:25, 419:10, 426:21, 431:23, 431:24, 432:20, 440:12, 440:17, 446:1, 450:13, 451:1, 451:3, 456:11, 461:9, 464:1, 469:15
people's [2] - 321:25, 351:25
perceive [1] - 453:10
perceived [2] - 467:21, 467:24
percent [4] - 392:23, 439:18, 439:19, 439:20
percentage [1] - 435:15
perception [1] - 313:6
perfect [2] - 422:24, 462:7
perform [1] - 356:25
performance [1] - 430:9
performing [1] - 400:23
perhaps [1] - 321:23
period [4] - 328:1, 332:7, 332:22, 334:19
perishable [1] - 422:25
permission [2] - 344:11, 344:14
person [19] - 342:9, 342:13, 347:7, 347:11, 361:25, 365:14, 369:8, 369:13, 382:23, 392:8, 400:10, 424:24, 425:1, 450:13, 455:20, 457:7, 458:14, 461:8, 466:18
personalities [1] - 347:15
personality [1] - 347:12
personnel [14] - 331:3, 335:5, 335:17, 342:18, 343:25, 348:21, 350:14, 387:3, 432:6, 438:10, 452:4, 467:5, 467:19, 468:4
perspective [3] - 345:22, 354:24, 435:6
Peterson [10] - 334:9, 334:18, 335:16, 335:20, 348:15, 352:4, 352:9, 352:14, 353:7, 420:19
Peterson's [1] - 421:1
PGA [1] - 309:12
philosophy [2] - 342:1, 423:2
phone [2] - 338:24, 344:14
Phone [2] - 309:10, 309:13
phonetic [1] - 453:1
phrase [2] - 375:12, 411:9
physical [4] - 342:19, 342:24, 381:25, 456:19
pick [4] - 330:24, 338:24, 342:13, 375:6
piece [1] - 421:12
piloting [1] - 371:15
pinpoint [1] - 449:21
PL-05 [1] - 309:5
place [8] - 340:21, 356:5, 373:4, 373:7, 373:11, 433:8, 443:6, 464:5
places [4] - 390:13, 392:25, 443:15, 457:13
plan [4] - 311:25, 321:24, 333:9, 423:7
plane [5] - 440:14, 440:15, 442:23, 443:7, 469:14
planes [1] - 333:3
planned [1] - 376:22
planning [3] - 321:5, 349:8, 457:25
plans [2] - 321:11, 467:2
plant [2] - 342:19, 342:24
play [1] - 340:18
played [1] - 452:20
plethora [2] - 450:13, 452:1
plug [1] - 342:4
plus [2] - 312:25, 380:5
point [19] - 312:21, 366:7, 378:5, 378:7, 383:16, 402:1, 407:18, 410:5, 416:5, 427:16, 433:18, 438:21, 439:8, 441:12, 459:17, 459:18, 459:24, 460:20, 464:7
Polan [10] - 351:14, 351:16, 351:25, 354:12, 452:9, 454:16, 455:8, 457:2, 460:16, 467:10
police [35] - 321:2, 321:3, 322:4, 322:20, 322:21, 322:22, 327:12, 337:21, 338:4, 344:4, 344:10, 346:20, 348:10, 349:15, 349:17, 354:7, 359:3, 369:8, 374:15, 390:25, 391:14, 392:1, 392:8, 392:16, 394:17, 396:16, 400:16, 403:12, 405:13, 409:23, 439:16, 439:18, 439:19, 439:25
Police [3] - 390:16, 405:9, 458:9
polices [1] - 349:17
policies [31] - 348:4, 350:19, 354:7, 354:14, 354:16, 354:19, 354:20, 354:23, 354:25, 355:14, 355:21, 356:2, 356:4, 356:16, 356:17, 356:21, 359:17, 360:9, 360:24, 360:25, 361:8, 363:18, 364:1, 364:2, 389:25, 403:20, 404:1, 408:21, 408:22, 443:15
policing [1] - 349:15
policy [69] - 335:13, 343:13, 353:10, 353:12, 353:13, 353:17, 353:19, 353:21, 353:22, 354:1, 354:21, 355:7, 355:10, 355:20, 356:8, 356:15, 356:16, 356:19, 356:20, 356:22, 356:23, 357:1, 357:6, 357:16, 357:22, 360:15, 360:17, 361:2, 362:11, 362:14, 363:1, 363:23, 364:4, 380:9, 386:14, 386:15, 386:23, 387:15, 405:22, 405:24, 406:9, 406:13, 406:15, 406:17, 407:6, 407:7, 407:10, 407:25, 408:7, 408:19, 408:24, 409:2, 409:13, 409:18, 410:3, 410:7, 410:8, 421:8, 421:12, 421:16, 421:19, 421:20, 421:23, 446:21, 446:24, 446:25, 458:1
political [2] - 378:2, 378:24
politically [1] - 314:8
politicians [1] - 356:13
Pompano [13] - 337:9, 337:20, 337:21, 338:5, 340:8, 371:10, 414:6, 416:19, 417:9, 419:23, 420:1, 420:20, 448:23
population [1] - 340:12
Port [3] - 441:20, 443:21, 458:8
portion [2] - 400:13, 455:5
portions [1] - 330:22
Posed [1] - 388:1
posed [3] - 318:9, 387:24, 387:25
position [6] - 318:11, 338:23, 377:14, 378:2, 430:23, 449:10
positions [3] - 377:13, 396:12, 439:15

- positive** [2] - 325:17, 326:13
positives [1] - 465:9
possibility [1] - 413:23
possible [2] - 322:9, 362:1
possibly [3] - 361:18, 373:16, 390:19
post [8] - 323:5, 324:4, 324:12, 327:6, 333:11, 357:17, 372:9, 376:1
posts [1] - 439:15
posture [2] - 454:20, 455:10
potential [3] - 376:8, 381:24, 429:24
power [3] - 316:21, 325:15, 331:11
PowerPoint [1] - 424:15
practical [8] - 325:10, 409:19, 409:22, 410:13, 425:6, 426:1, 426:4, 428:21
practically [1] - 410:7
practice [6] - 315:9, 335:23, 424:19, 425:19, 425:22, 468:2
practices [5] - 354:7, 355:23, 363:4, 363:11, 380:9
practicing [1] - 315:5
pragmatic [1] - 462:16
pray [1] - 377:19
pre [3] - 333:10, 405:6, 439:21
pre-dated [2] - 405:6, 439:21
pre-Fort [1] - 333:10
preconceived [1] - 342:6
predominant [1] - 397:21
preeminent [1] - 341:1
premise [2] - 335:14, 415:1
preparation [5] - 321:5, 339:18, 350:11, 352:21, 451:24
prepare [11] - 330:13, 332:2, 332:3, 332:6, 332:16, 332:20, 333:8, 333:9, 333:12
prepared [2] - 383:9, 383:10
preparing [1] - 321:15
preplanned [1] - 461:5
presence [2] - 454:23, 455:14
present [2] - 311:24, 314:20
presentation [9] - 323:25, 324:20, 325:4, 329:20, 329:25, 342:15, 350:14, 424:16, 456:19
presentations [4] - 324:3, 329:6, 329:22, 330:5
preserve [2] - 312:9, 407:15
president [1] - 316:4
presumably [2] - 432:10, 434:12
pretty [1] - 449:10
prevent [8] - 321:22, 330:13, 332:1, 332:5, 332:16, 362:10, 401:16
previous [1] - 323:22
PRIMROSE [26] - 309:3, 316:9, 385:12, 385:14, 401:8, 401:9, 401:22, 401:23, 407:1, 407:8, 413:11, 423:16, 423:19, 423:22, 424:3, 424:8, 427:11, 427:15, 428:1, 428:6, 436:25, 437:1, 440:24, 465:14, 469:17, 470:6
Primrose [9] - 310:5, 313:19, 316:1, 316:5, 316:8, 317:18, 385:6, 385:10, 469:25
Primrose's [1] - 440:21
principal [2] - 347:6, 347:17
principals [3] - 341:15, 341:18, 434:23
priorities [1] - 370:8
prioritized [3] - 398:25, 399:3, 414:2
priority [1] - 337:6
privacy [1] - 344:18
problem [1] - 326:10
procedural [1] - 311:10
procedure [3] - 316:14, 316:25, 406:16
procedures [3] - 316:21, 316:24, 348:5
proceed [7] - 312:1, 312:7, 385:11, 401:7, 401:21, 436:24, 440:22
proceedings [5] - 314:18, 314:19, 315:3, 317:22, 471:7
PROCEEDINGS [1] - 308:9
Proceedings [2] - 311:2, 470:10
process [27] - 312:19, 313:3, 313:4, 314:21, 315:20, 316:15, 316:23, 316:24, 316:25, 319:18, 319:24, 320:1, 320:8, 320:17, 324:20, 327:17, 346:10, 353:4, 353:6, 353:23, 353:25, 355:2, 366:12, 366:20, 371:17, 380:24, 467:3
processing [1] - 328:6
produces [1] - 328:11
product [9] - 320:7, 461:10, 463:13, 465:8, 465:13, 466:21, 466:22, 466:24
products [1] - 456:1
profession [2] - 321:1, 321:14
Professional [4] - 449:6, 450:22, 468:19, 471:5
professional [5] - 316:17, 329:24, 337:2, 450:21, 463:17
profiling [1] - 389:5
program [3] - 393:6, 393:9, 393:13
programs [1] - 349:23
progression [1] - 461:2
projects [1] - 336:21
promise [5] - 384:9, 384:11, 384:23, 420:11, 426:25
promoted [1] - 387:7
promoting [1] - 379:1
promotion [1] - 448:25
promptly [1] - 348:16
prone [1] - 429:19
properly [1] - 364:17
property [2] - 400:17, 400:21
proposals [1] - 454:17
Proposals [1] - 451:22
proposed [1] - 311:12
prosecutor [1] - 313:23
protect [8] - 319:5, 395:14, 396:22, 400:16, 400:21, 400:24, 401:4, 432:24
protecting [1] - 438:8
Protecting [1] - 413:2
protection [2] - 340:11, 367:10
protocol [1] - 374:10
protocols [2] - 325:12, 444:16
proud [3] - 450:7, 450:8, 465:12
provide [14] - 316:4, 348:4, 348:7, 349:6, 350:14, 393:16, 430:12, 434:17, 435:12, 436:5, 436:14, 437:3, 437:11, 438:3
provided [5] - 317:4, 317:12, 414:25, 421:2, 423:7
provides [2] - 410:14, 429:11
providing [1] - 444:10
proviso [1] - 359:14
proximity [1] - 333:4
PSA [1] - 439:16
public [7] - 312:24, 317:1, 342:15, 376:13, 377:1, 461:18, 461:20
Public [1] - 449:7
public's [2] - 313:6, 315:18
published [1] - 461:11
Publix [1] - 443:10
pull [7] - 340:5, 345:22, 404:20, 404:23, 418:14, 418:20, 419:5
pulled [1] - 373:11
pulling [1] - 450:3
Pulse [2] - 321:11, 323:11
purpose [3] - 320:20, 383:4, 408:11
purposes [1] - 361:2
pursuance [1] - 360:16
pursue [1] - 361:24
push [4] - 322:15, 329:11, 361:20, 435:18
push-back [1] - 329:11
Pusins [1] - 354:4
put [14] - 342:10, 343:23, 392:9, 424:9, 438:8, 447:15, 450:17, 453:19, 453:24, 454:5, 456:3, 456:12, 462:5, 464:5
puts [3] - 451:21, 454:8, 455:6
putting [1] - 342:4

Q

- qualified** [1] - 348:1
quality [2] - 433:2, 448:13
questioned [1] - 407:17
Questions [1] - 387:24
questions [14] - 324:22, 325:1, 387:20, 387:23, 388:13, 390:5, 395:25, 409:21, 410:2, 424:5, 426:24, 427:1, 436:2, 456:15
quicker [1] - 321:25
Quite [2] - 328:4, 334:21
quite [6] - 325:1, 339:15, 356:21, 357:13, 358:10, 362:20
quote [2] - 314:23, 400:23
quote/unquote [1] - 313:19
quoting [2] - 318:24, 331:2

R

- race** [4] - 375:5,
375:7, 375:12, 375:17
radio [6] - 373:16,
373:17, 373:18,
382:15, 382:25
radios [1] - 373:19
raise [1] - 429:14
raised [2] - 318:10,
365:4
ran [1] - 433:17
rank [2] - 354:9,
450:8
ranks [2] - 320:22,
448:25
rate [2] - 435:10,
435:15
Rather [1] - 330:12
rather [1] - 400:6
re [2] - 333:5, 386:24
RE [1] - 308:3
re-create [1] - 333:5
re-created [1] -
386:24
react [3] - 335:2,
375:2, 443:17
reacting [1] - 381:20
read [35] - 317:10,
318:20, 321:9, 338:7,
354:25, 356:16,
356:21, 360:22,
360:24, 361:8,
381:11, 406:23,
414:25, 421:16,
426:19, 426:23,
426:24, 427:8,
428:12, 441:2, 446:6,
453:25, 455:1, 455:2,
455:3, 459:7, 459:16,
460:11, 465:7,
466:17, 466:21,
466:22, 466:23, 467:8
reader [1] - 356:15
reading [4] - 331:24,
427:21, 461:12, 468:7
readings [1] - 341:17
ready [2] - 335:23,
384:3
real [9] - 339:12,
344:4, 368:21,
407:13, 413:23,
419:8, 419:20,
420:15, 429:12
real-life [4] - 339:12,
419:8, 419:20, 420:15
real-time [3] - 344:4,
407:13, 429:12
reality [1] - 410:22
realization [1] -
381:20
realize [3] - 313:12,
331:9, 389:11
realized [2] - 322:8,
322:14
really [14] - 326:4,
333:5, 369:3, 372:18,
375:10, 382:8,
399:18, 406:23,
412:10, 414:6,
416:21, 418:24,
436:16, 465:12
realities [1] - 325:10
reason [15] - 330:8,
331:12, 341:14,
348:14, 357:19,
403:23, 428:19,
428:23, 430:4, 431:8,
448:17, 448:18,
454:12, 454:14,
465:25
reasonable [4] -
328:2, 328:4, 361:10,
408:8
reasonably [1] -
384:14
reasons [1] - 314:24
received [6] - 367:9,
367:16, 369:5,
371:25, 401:14
receiving [2] -
398:21, 398:22
recess [2] - 385:9,
470:9
recitation [1] -
318:25
recommend [2] -
396:20, 438:18
recommendation [1]
- 438:17
recommendations
[3] - 453:10, 454:11,
459:10
reconvene [2] -
385:7, 470:8
Record [1] - 308:23
record [11] - 312:9,
312:10, 313:20,
314:22, 315:15,
315:23, 318:17,
424:6, 448:13,
469:18, 471:8
records [2] - 461:18,
461:20
red [6] - 328:16,
352:15, 352:20,
352:24, 353:6,
360:24, 361:16,
362:11
reelected [2] - 384:5,
412:21
reeling [1] - 381:19
referring [1] - 330:10
reflect [1] - 349:2
refresh [1] - 389:2
regard [1] - 311:5
regarding [5] -
320:21, 344:18,
357:6, 378:3, 387:21
regardless [1] -
407:9
regional [2] - 331:4,
373:19
Registered [1] -
471:5
regular [3] - 350:21,
353:22, 431:25
regularly [2] - 336:7,
432:23
regularly-
scheduled [1] -
432:23
regulated [1] -
313:13
reinforcements [2] -
430:24, 431:9
reinstatement [1] -
316:23
reinvent [1] - 356:18
related [1] - 452:3
relational [1] -
381:25
released [1] - 463:14
releasing [1] - 459:2
relevant [1] - 400:10
relied [3] - 464:17,
464:19, 465:5
rely [4] - 375:2,
420:5, 464:22, 465:5
remains [1] - 327:6
remarks [1] - 314:21
remember [18] -
324:1, 330:17,
339:25, 343:6, 363:4,
374:17, 378:9,
382:12, 387:23,
404:13, 420:10,
445:16, 459:13,
461:12, 461:20,
461:21, 467:17, 469:7
Remember [2] -
430:15, 431:14
remembered [1] -
351:21
remind [1] - 312:3
removal [5] - 313:18,
313:22, 314:7,
314:13, 316:22
removed [2] - 317:6,
348:18
RENCHEN [3] -
308:22, 471:5, 471:15
Reno [1] - 324:11
renowned [2] -
418:12, 418:17
repeat [1] - 374:1
repel [1] - 337:13
repelled [2] - 337:17,
414:17
repelling [1] - 371:11
report [72] - 316:3,
317:10, 319:7, 319:9,
319:19, 327:19,
327:23, 327:24,
328:3, 328:13,
328:18, 328:21,
329:4, 329:5, 329:12,
330:1, 330:10,
330:11, 330:13,
330:22, 331:1, 332:1,
332:2, 332:4, 332:10,
332:13, 332:19,
332:24, 349:2, 351:2,
358:17, 367:17,
367:21, 367:22,
368:15, 368:21,
369:6, 369:17,
370:17, 370:21,
446:22, 447:1, 447:3,
447:6, 447:10,
447:16, 450:14,
450:17, 456:3,
457:12, 459:4,
460:17, 460:23,
460:25, 461:3,
461:18, 461:19,
462:1, 462:15,
462:22, 463:6, 463:7,
465:4, 465:11,
465:16, 465:23,
466:15, 466:20,
469:3, 469:5, 471:7
report's [1] - 318:25
reported [3] -
369:16, 369:23,
441:15
Reported [1] -
308:21
REPORTER [2] -
423:18, 471:1
reporter [2] - 328:24,
470:2
Reporter [4] -
308:22, 423:16,
471:6, 471:15
REPORTER'S [1] -
310:7
reporting [1] -
373:25
Reporting [1] -
308:23
reports [9] - 313:1,
367:25, 368:5,
382:11, 392:12,
392:13, 439:4,
463:23, 463:24
representative [1] -
437:10
reps [1] - 378:8
Republican [1] -
378:12
request [4] - 338:24,
460:8, 461:18, 461:20
requested [1] -
436:11
requesting [1] -
465:19
require [4] - 360:9,
380:4, 395:1, 436:21
required [14] -
359:10, 388:20,
389:12, 390:7,
390:16, 390:17,
391:5, 391:16,
391:18, 391:25,
392:19, 394:23,
398:12, 400:24
requirement [5] -
355:6, 367:3, 388:16,
393:3, 393:5
requirements [4] -
313:15, 360:2,
389:15, 438:7
requires [3] - 343:9,
395:12, 403:15
requiring [2] -
311:12, 468:3
rescue [6] - 331:4,
416:15, 419:1, 442:5,
452:14, 453:2
Rescue [1] - 422:7
research [1] - 447:25
resign [1] - 378:10
resource [15] -
333:23, 334:3, 335:2,
347:25, 396:20,
398:2, 398:4, 398:13,
399:7, 415:25,
416:13, 416:18,
416:24, 417:2, 433:10
resources [2] -
438:11, 440:10
respect [8] - 312:18,
312:20, 313:14,
315:7, 346:20, 360:2,
366:22, 379:7
Respectfully [1] -
410:17
respectfully [1] -
364:22

respond [10] - 316:1, 335:5, 356:24, 379:3, 394:8, 409:24, 417:3, 420:2, 427:5, 442:5
responded [1] - 414:21
responder [1] - 374:18
responders [1] - 375:6
responding [3] - 335:10, 374:3, 427:9
Response [1] - 423:8
response [16] - 316:7, 321:24, 325:6, 346:13, 347:18, 352:3, 352:21, 363:24, 425:14, 425:20, 426:2, 428:8, 429:1, 429:4, 454:23, 455:14
responsibilities [6] - 336:1, 352:10, 371:2, 378:21, 381:17, 399:14
responsibility [14] - 320:2, 320:7, 341:2, 342:17, 362:24, 362:25, 371:3, 375:22, 391:1, 391:10, 395:16, 396:1, 399:18, 401:15
responsible [4] - 342:23, 402:11, 402:22, 432:8
responsive [1] - 464:24
result [1] - 323:7
resulted [1] - 366:2
retired [1] - 442:9
Retired [1] - 442:10
retirement [1] - 467:24
retrieved [1] - 440:16
reveals [1] - 319:1
review [9] - 327:17, 353:21, 353:23, 354:1, 450:13, 452:10, 459:20, 461:10, 461:23
REVIEW [1] - 308:10
reviewed [2] - 319:11, 326:20
reviewing [2] - 354:22, 450:3
reviews [3] - 326:24, 328:16, 404:4
revised [1] - 356:5
revisions [2] - 458:1, 460:2

rewound [1] - 344:2
rewriting [1] - 327:17
Rifle [1] - 376:19
rifle [2] - 346:4, 346:5
rightfully [1] - 445:24
rights [5] - 312:19, 316:15, 344:18, 344:19, 366:25
rigorously [1] - 323:2
rise [1] - 368:1
risk [3] - 312:19, 313:3, 367:10
road [8] - 358:21, 359:2, 396:15, 406:3, 406:6, 432:1, 448:6, 448:21
robbery [1] - 464:14
Robert [1] - 339:3
rode [1] - 358:23
Roger [1] - 377:6
role [6] - 334:11, 358:12, 381:16, 434:3, 449:16, 452:20
Ron [1] - 357:8
room [5] - 431:5, 431:6, 431:8, 462:8, 462:9
Room [1] - 308:12
rose [2] - 406:8, 406:9
rough [3] - 467:6, 467:9, 467:10
round [7] - 342:4, 342:5, 457:3, 457:18, 459:1, 460:1, 461:8
Rubio [1] - 377:3
rule [1] - 367:4
rules [4] - 316:17, 316:21, 316:24, 367:3
run [2] - 327:10, 373:5
Runcie [1] - 339:3
running [4] - 331:19, 333:6, 378:11, 429:11
rural [2] - 390:5, 390:18

S

S.E [1] - 309:9
sadly [2] - 321:16, 350:23
safe [1] - 440:12
Safe [1] - 462:7
safely [1] - 325:21
safer [2] - 322:1, 467:13

safety [8] - 325:18, 341:1, 342:21, 343:22, 349:7, 351:8, 376:5
salary [1] - 439:20
Sam [1] - 381:5
sanctioned [1] - 314:3
Sandy [1] - 413:19
Santa [3] - 347:9, 347:12, 347:18
sat [2] - 313:7, 331:15
save [3] - 321:24, 322:17, 394:14
saw [7] - 340:23, 365:11, 367:12, 433:24, 456:18, 456:23, 460:15
scale [18] - 337:4, 337:11, 339:12, 339:23, 340:10, 351:11, 351:22, 417:15, 417:21, 417:22, 418:14, 419:8, 419:20, 420:1, 420:9, 420:15, 444:13, 444:23
scenario [11] - 337:5, 337:15, 339:13, 339:23, 340:10, 351:12, 351:22, 366:2, 389:8, 426:11, 428:4
scenario-based [1] - 389:8
scenarios [2] - 425:6, 426:1
scene [6] - 330:15, 365:10, 373:6, 382:15, 453:1
schedule [2] - 311:21, 470:3
scheduled [1] - 432:23
School [11] - 337:10, 338:5, 343:4, 345:8, 349:16, 365:5, 414:7, 417:9, 420:1, 420:21, 433:8
school [69] - 333:23, 334:2, 334:3, 335:1, 335:21, 335:22, 335:23, 336:3, 336:8, 337:4, 337:13, 338:25, 339:3, 339:13, 340:10, 340:24, 341:7, 341:19, 342:25, 343:1, 343:6, 343:13,

343:22, 343:25, 344:7, 344:16, 345:14, 347:5, 347:7, 347:25, 349:6, 349:7, 351:11, 351:12, 352:15, 352:18, 352:19, 352:20, 352:25, 361:4, 367:18, 390:6, 396:20, 397:4, 397:5, 397:10, 397:18, 398:2, 398:4, 398:13, 399:6, 412:23, 413:1, 413:14, 413:23, 414:18, 415:24, 416:13, 416:18, 416:23, 417:2, 417:4, 417:16, 420:3, 420:17, 433:10, 441:13
Schools [9] - 333:22, 334:14, 338:11, 343:17, 349:11, 349:23, 350:6, 350:17, 353:2
schools [33] - 333:22, 334:5, 334:16, 335:17, 340:20, 341:13, 341:16, 341:21, 342:19, 343:9, 343:14, 343:17, 343:19, 344:12, 346:14, 346:17, 346:19, 348:1, 349:18, 351:3, 351:7, 351:8, 365:4, 376:6, 396:22, 397:23, 411:2, 412:4, 412:22, 413:2, 419:9, 419:14, 435:8
schools' [1] - 342:18
Schools' [1] - 346:13
scope [3] - 381:20, 445:23, 466:8
Scot [1] - 334:8
SCOTT [1] - 310:4
Scott [12] - 308:3, 311:7, 312:19, 313:17, 313:20, 314:7, 314:14, 315:4, 317:3, 317:12, 331:15
screen [1] - 406:25
SEAL [1] - 347:13
seamless [1] - 437:14
seamlessly [2] - 373:10, 446:16
seaport [2] - 420:9, 442:2

search [2] - 337:19, 429:7
searchable [2] - 368:1, 368:2
season [1] - 378:25
second [14] - 345:3, 362:4, 367:8, 371:19, 377:15, 378:3, 379:7, 392:4, 392:6, 400:22, 460:1, 461:1, 462:21, 467:4
seconds [2] - 313:7, 433:25
section [4] - 318:12, 427:8, 431:13, 451:21
Section [1] - 400:9
secured [1] - 330:16
security [10] - 341:10, 342:21, 349:8, 350:18, 351:3, 411:12, 411:14, 457:25, 467:22
see [21] - 311:18, 323:6, 348:22, 358:21, 365:5, 365:7, 368:11, 377:16, 380:18, 396:23, 403:25, 406:7, 406:23, 406:25, 409:22, 423:13, 424:10, 453:20, 458:20, 464:9, 466:17
See [1] - 443:8
seeing [6] - 362:2, 364:9, 374:17, 404:13, 428:12, 457:10
segment [3] - 377:6, 377:8, 377:11
segments [1] - 358:11
select [1] - 342:5
selected [3] - 334:25, 341:20, 447:18
selecting [1] - 342:1
selection [1] - 341:22
selectively [1] - 330:21
Self [1] - 381:18
Self-imposed [1] - 381:18
seminar [7] - 350:5, 350:12, 350:15, 350:18, 351:2, 351:10, 351:13
senate [3] - 316:4, 317:5, 384:24
SENATE [1] - 308:1

- Senate** [4] - 308:12, 314:11, 316:20, 316:22
senate's [1] - 385:1
Senate's [1] - 316:23
Senator [2] - 377:2, 377:3
senators [3] - 314:12, 317:9, 317:14
send [1] - 339:16
sends [1] - 457:13
senior [4] - 452:24, 454:9, 458:19, 459:19
sense [5] - 323:18, 341:9, 342:19, 382:4, 467:21
senses [1] - 430:22
sensitive [1] - 470:1
sent [3] - 340:22, 356:23, 447:14
sentence [2] - 400:12, 400:22
Sentinel [1] - 461:19
separate [1] - 423:13
sergeant [2] - 362:7, 448:21
sergeants [1] - 468:24
series [3] - 324:21, 325:3, 326:24
serious [1] - 382:20
seriously [1] - 468:9
serve [6] - 342:14, 384:6, 384:11, 384:24, 432:24, 464:1
served [2] - 382:1, 468:10
service [5] - 348:23, 370:4, 370:5, 439:16, 439:17
services [3] - 436:5, 436:14, 437:11
session [4] - 397:4, 397:5, 397:8, 397:11
set [10] - 340:25, 359:14, 372:11, 372:17, 372:23, 373:14, 395:4, 450:25, 460:1
sets [1] - 347:15
setting [1] - 420:17
seventh [1] - 466:2
several [4] - 314:9, 343:5, 454:21, 455:12
severe [1] - 367:9
sex [1] - 389:5
shake [1] - 331:12
shaking [1] - 363:25
shall [20] - 360:22, 360:25, 361:9, 361:11, 361:12, 361:14, 400:11, 408:1, 408:4, 408:5, 408:6, 408:7, 408:13, 408:14, 409:2, 409:11, 409:12, 409:13, 410:15
shameful [3] - 313:19, 313:20, 314:23
share [2] - 324:19, 331:23
shared [2] - 362:21, 365:15
sheet [1] - 404:17
Sheriff [20] - 308:3, 309:7, 311:7, 311:9, 312:3, 317:24, 318:4, 320:11, 327:7, 328:23, 330:15, 331:2, 340:4, 341:2, 366:16, 375:11, 381:1, 409:6, 410:19
sheriff [59] - 314:25, 323:18, 325:14, 327:4, 331:10, 331:12, 336:14, 336:17, 336:22, 338:24, 340:20, 348:3, 348:10, 354:17, 358:12, 358:20, 359:22, 364:7, 364:21, 365:14, 370:5, 375:21, 375:25, 376:11, 377:4, 378:13, 378:21, 384:6, 384:15, 384:22, 385:16, 385:17, 386:5, 390:25, 395:12, 395:17, 396:2, 399:15, 399:18, 401:15, 402:4, 402:11, 402:20, 402:22, 404:7, 404:18, 406:14, 412:20, 416:18, 425:18, 432:6, 435:16, 439:22, 440:19, 441:12, 444:10, 444:15, 448:20, 469:9
Sheriff's [27] - 320:19, 335:13, 357:5, 360:1, 370:17, 371:9, 371:20, 374:15, 379:16, 385:21, 386:4, 386:8, 392:20, 394:17, 396:19, 406:15, 415:24, 417:3, 418:13, 420:14, 431:18, 434:5, 434:21, 448:10, 448:16, 458:14, 469:16
sheriffs [15] - 311:16, 359:4, 370:8, 379:19, 379:23, 380:4, 380:10, 391:10, 393:19, 402:21, 403:12, 405:13, 434:15, 434:16, 449:1
sheriffs [5] - 324:16, 400:10, 402:10, 409:10
sheriffs' [2] - 323:13, 355:10
Sheriffs' [2] - 324:7, 324:9
shoot [1] - 367:18
Shooter [2] - 422:6, 423:8
shooter [57] - 335:6, 335:10, 335:12, 337:5, 338:5, 339:13, 340:10, 341:4, 349:3, 351:22, 353:10, 355:6, 356:2, 356:4, 357:25, 358:8, 359:11, 359:16, 359:17, 359:19, 360:9, 360:15, 360:17, 362:8, 364:14, 365:22, 366:1, 369:6, 388:17, 399:7, 405:22, 406:13, 406:17, 410:21, 411:5, 411:20, 415:6, 416:14, 417:4, 417:10, 417:15, 418:15, 420:3, 420:16, 421:7, 421:23, 422:20, 423:5, 425:15, 431:6, 433:15, 433:17, 444:23, 452:19, 467:2, 467:3, 468:1
shooter/killer [1] - 351:12
shooters [2] - 415:11, 415:12
shooting [27] - 318:6, 319:2, 323:24, 324:5, 325:5, 325:23, 327:25, 364:18, 371:13, 407:25, 413:3, 431:5, 433:13, 433:21, 434:4, 438:25, 440:9, 441:6, 441:13, 441:14, 444:10, 445:19, 458:4, 464:10, 465:17, 466:14, 469:14
shootings [4] - 412:23, 413:1, 413:14, 413:23
short [3] - 332:7, 332:22, 396:16
shortly [1] - 344:20
shot [4] - 337:14, 433:24, 434:1, 440:18
show [9] - 368:6, 380:18, 400:2, 402:13, 402:15, 406:19, 442:11, 451:18, 453:20
showing [2] - 404:13, 453:13
shown [1] - 348:24
Shults [4] - 420:5, 420:6, 457:4, 457:19
shut [12] - 325:6, 325:12, 325:15, 325:19, 444:12, 444:17, 445:5, 445:17, 446:10, 446:14, 446:15
shuts [1] - 352:20
shutting [1] - 326:3
si [1] - 468:1
side [1] - 414:17
sign [1] - 437:24
Sign [1] - 421:17
signed [3] - 344:20, 439:24, 463:7
significant [4] - 323:25, 349:2, 372:2, 448:25
silly [1] - 382:21
similar [3] - 417:21, 419:25, 422:8
similarly [1] - 411:4
simple [2] - 436:22, 454:2
simply [2] - 423:2, 438:9
single [12] - 343:9, 414:2, 416:17, 420:12, 425:20, 426:14, 427:2, 427:18, 429:1, 429:3, 429:18, 430:7
Single [1] - 428:7
singled [1] - 357:18
sisters [1] - 340:3
sit [6] - 321:8, 321:16, 323:11, 358:17, 434:23, 464:7
sit-down [1] - 323:11
sitting [2] - 365:12, 388:12
situated [2] - 376:18, 400:17
situation [18] - 335:3, 335:6, 335:10, 362:5, 362:9, 365:13, 374:24, 415:12, 415:18, 417:4, 420:3, 420:16, 430:25, 431:1, 436:8, 444:23, 445:3, 452:19
situations [3] - 341:7, 410:21, 411:6
Six [1] - 357:15
six [3] - 321:8, 422:19, 440:18
six-year [1] - 422:19
sixth [1] - 466:1
size [4] - 397:2, 398:18, 432:19, 435:1
skaplan@kaplanparkerlaw.com [1] - 309:14
skill [2] - 347:15, 422:25
small [2] - 390:5, 441:1
smallest [1] - 390:18
SMH [1] - 363:25
snapped [1] - 366:16
society [2] - 400:15, 412:2
soft [7] - 411:9, 411:18, 411:23, 412:5, 419:14, 419:19, 419:24
sole [4] - 383:4, 383:19, 407:13, 428:5
solely [1] - 385:17
solo [4] - 425:14, 426:2, 426:5, 426:20
someone [1] - 348:12
sometime [1] - 458:18
sometimes [6] - 313:10, 347:1, 347:11, 383:2, 396:16, 396:23
somewhere [2] - 321:17, 333:4
soon [6] - 322:9, 361:18, 362:1, 372:10, 376:15, 381:8
SOP [1] - 363:3

- sorry** [1] - 401:21
sound [3] - 389:10, 422:8, 431:20
Sounds [1] - 422:9
sounds [3] - 389:9, 410:17, 468:16
South [2] - 308:13, 339:10
speaking [1] - 318:5
SPECIAL [26] - 311:3, 312:7, 312:11, 312:13, 315:25, 316:8, 317:18, 317:24, 318:15, 328:23, 329:2, 385:4, 385:10, 401:7, 401:21, 406:25, 407:2, 413:10, 424:4, 427:7, 427:20, 436:24, 440:22, 464:25, 469:22, 470:7
Special [18] - 308:14, 312:8, 312:12, 312:15, 313:2, 313:8, 313:16, 360:21, 363:3, 385:12, 388:8, 401:19, 406:22, 427:15, 436:1, 436:21, 440:20, 469:18
special [3] - 349:12, 350:8, 372:18
specific [11] - 361:24, 389:20, 393:3, 393:13, 432:1, 433:5, 435:21, 435:24, 438:22, 467:4
specifically [2] - 329:18, 443:12
specified [1] - 334:2
speech [1] - 314:10
spent [5] - 423:23, 424:12, 424:18, 425:5, 450:4
spirit [1] - 409:16
spoken [2] - 455:23, 455:24
spokesperson [2] - 376:18, 379:11
sport [1] - 340:18
sporting [1] - 315:10
spot [1] - 450:6
spring [2] - 397:16, 398:7
Springs [4] - 322:21, 373:17, 373:19, 374:17
SRO [26] - 333:23, 334:15, 334:18, 334:22, 334:23, 334:24, 334:25, 335:16, 335:19, 336:4, 341:22, 341:24, 342:11, 342:16, 346:3, 346:5, 347:7, 347:8, 348:15, 352:4, 352:15, 353:7, 397:19, 415:2, 415:6, 420:19
SROs [11] - 336:1, 336:6, 341:9, 341:13, 342:17, 346:22, 349:6, 417:6, 417:20, 420:2
staff [36] - 319:15, 320:21, 320:24, 321:8, 323:5, 329:24, 333:22, 344:8, 344:9, 354:15, 355:1, 362:23, 372:8, 380:5, 406:1, 406:6, 406:7, 406:11, 418:18, 433:2, 437:13, 437:17, 441:2, 447:1, 449:12, 451:11, 452:24, 454:9, 456:7, 456:10, 458:20, 459:15, 459:19, 464:19, 467:16
staff-level [1] - 319:15
staffed [1] - 440:9
staffing [1] - 452:3
stage [1] - 377:4
stages [1] - 382:10
staggered [1] - 311:14
stakeholders [1] - 452:6
stamp [2] - 451:21, 467:18
stand [5] - 312:4, 313:25, 315:7, 423:20, 469:20
standard [7] - 355:23, 359:18, 398:17, 398:21, 406:15, 408:21, 434:24
standards [10] - 362:17, 362:20, 362:21, 363:13, 364:8, 374:11, 379:25, 395:4, 456:20, 463:17
Standards [5] - 355:5, 387:22, 449:6, 450:22, 468:19
start [5] - 322:17, 405:1, 416:6, 416:8, 416:10
started [3] - 411:4, 415:1, 442:1
starting [2] - 350:2, 464:19
starts [1] - 344:25
State [13] - 315:6, 317:17, 343:8, 355:4, 363:16, 389:13, 389:16, 389:21, 390:1, 399:15, 400:5, 401:12, 403:11
state [6] - 313:11, 331:10, 364:2, 371:1, 378:8
statement [14] - 313:9, 313:22, 318:22, 319:5, 332:18, 363:8, 395:15, 399:19, 413:25, 434:8, 434:19, 454:25, 455:16, 455:22
statements [4] - 311:25, 315:1, 315:17, 317:19
states [1] - 400:10
States [3] - 376:23, 403:2, 414:3
statistics [1] - 438:7
stats [1] - 452:5
status [1] - 338:25
statute [1] - 393:12
Statute [3] - 389:13, 399:12, 402:6
Statutes [1] - 385:25
statutory [1] - 371:2
stay [1] - 331:9
stayed [1] - 331:22
stenographic [1] - 471:9
stenographically [1] - 471:7
step [5] - 327:11, 461:1, 461:2, 461:24, 462:12
still [16] - 312:5, 313:13, 314:19, 314:24, 317:24, 337:16, 351:24, 381:19, 382:9, 392:19, 408:19, 431:6, 431:7, 431:15, 432:14
Stoneman [28] - 322:8, 322:13, 333:18, 333:25, 334:18, 335:21, 343:4, 346:3, 350:24, 351:4, 357:17, 365:6, 365:7, 371:13, 371:16, 371:24, 372:4, 372:6, 373:24, 376:1, 376:16, 381:9, 381:21, 382:16, 394:8, 407:25, 409:1, 409:7
stood [1] - 313:9
stop [5] - 322:17, 341:16, 358:25, 444:6, 464:13
stoplight [1] - 390:6
stops [2] - 329:20, 389:4
story [1] - 383:3
strategies [2] - 454:24, 455:15
Street [2] - 308:13, 309:9
streets [2] - 365:23, 392:9
strengths [2] - 453:10, 454:11
strike [5] - 328:16, 353:19, 358:2, 413:9, 436:23
strike-outs [1] - 328:16
strong [1] - 314:11
strong-arm [1] - 314:11
structure [1] - 407:14
STUART [1] - 309:11
student [3] - 361:7, 367:17, 433:4
students [8] - 324:13, 337:13, 337:25, 338:1, 344:19, 429:11, 432:18, 432:23
studying [1] - 423:1
stuff [2] - 341:17, 409:23
subject [2] - 328:7, 370:25
submissions [2] - 311:14, 311:19
submit [5] - 311:12, 404:21, 423:6, 469:4, 469:18
submitted [1] - 318:19
subordinates [1] - 449:19
suffering [1] - 377:18
suggest [2] - 325:4, 427:7
suggested [2] - 409:9, 409:10
suggesting [1] - 457:18
suggestions [2] - 324:23, 342:21
suicide [1] - 361:3
Suite [2] - 308:23, 309:12
summer [4] - 397:15, 397:23, 397:24
summertime [1] - 398:5
Summits [1] - 451:22
Sun [1] - 461:19
Sunshine [1] - 465:20
superintendent [2] - 339:3, 344:8
Superintendent [1] - 343:2
supply [1] - 390:10
support [5] - 318:10, 318:22, 363:1, 377:15, 469:10
supporting [1] - 445:25
supposed [1] - 372:20
supposition [2] - 435:20, 436:2
surely [1] - 363:21
surgeon [1] - 445:11
surgery [2] - 445:9, 445:10
surpasses [1] - 331:11
surprised [1] - 339:22
surrender [3] - 361:23, 429:15, 431:4
surrounding [3] - 418:25, 454:21, 455:12
surveillance [1] - 452:11
survey [1] - 371:21
survivors [1] - 365:15
Suspect [1] - 429:14
suspect [7] - 368:4, 429:19, 429:21, 429:24, 430:20, 430:21
suspend [2] - 317:3, 378:13
suspended [4] - 331:17, 344:20, 364:7, 410:9
suspension [4] - 311:6, 314:13,

318:23, 330:8
SUSPENSION [2] -
 308:3, 308:10
Suspension [2] -
 308:3, 311:6
SWAT [19] - 320:25,
 321:3, 336:24,
 336:25, 337:3,
 337:12, 338:16,
 338:19, 338:22,
 372:14, 382:23,
 414:23, 415:8,
 416:14, 430:23,
 442:4, 452:25, 462:7,
 462:9
switch [1] - 344:15
sworn [1] - 336:17
system [8] - 336:8,
 343:22, 349:6, 349:7,
 352:19, 367:24,
 373:20, 379:17
systematic [1] -
 446:4

T

table [3] - 457:3,
 457:19, 461:8
tables [1] - 459:1
tac [1] - 454:19
tactical [9] - 372:13,
 373:5, 373:9, 382:23,
 454:20, 454:23,
 455:9, 455:14, 455:23
tailor [1] - 356:22
take-away [1] - 322:7
take-aways [2] -
 321:12, 459:15
talents [1] - 320:21
Tallahassee [3] -
 308:13, 308:24, 309:5
Tapper [1] - 381:6
target [12] - 322:11,
 322:12, 411:2, 411:5,
 411:9, 411:23,
 419:14, 419:25,
 431:3, 431:4
targets [3] - 411:19,
 412:5, 419:20
tarmac [2] - 442:23,
 443:7
task [2] - 327:1,
 448:22
Task [1] - 422:7
taught [5] - 324:14,
 335:1, 375:3, 418:4,
 425:2
teach [4] - 335:4,
 395:9, 425:3, 462:3
teacher [1] - 347:6

teaching [4] -
 443:11, 443:13,
 443:14, 443:17
team [6] - 337:12,
 355:17, 407:13,
 426:12, 428:4, 428:13
teams [1] - 425:3
ten [1] - 377:9
tender [1] - 385:3
tenure [10] - 320:11,
 345:4, 404:7, 404:18,
 406:14, 406:16,
 408:12, 408:13,
 431:18
tenured [1] - 467:20
term [7] - 373:11,
 383:16, 383:19,
 384:7, 384:12,
 384:13, 385:2
terminal [6] - 440:16,
 442:2, 442:12,
 443:10, 443:23, 452:3
terminals [6] -
 393:20, 393:23,
 442:25, 443:1, 443:2,
 446:6
terms [1] - 434:24
terrible [4] - 365:13,
 374:23
territory [1] - 374:25
terrorism [3] -
 442:11, 454:24,
 455:15
terrorisms [1] -
 319:4
terrorist [3] - 376:8,
 446:4, 458:9
terrorists [2] - 442:2,
 442:15
test [6] - 417:2,
 418:24, 420:2,
 420:16, 423:1, 443:21
tested [1] - 364:2
testified [13] -
 393:15, 394:7,
 399:11, 408:3, 410:6,
 422:5, 422:10,
 442:14, 460:11,
 462:13, 462:18,
 463:18, 465:3
testify [4] - 321:16,
 343:25, 425:23, 451:9
testifying [4] - 388:1,
 388:3, 388:4, 388:7
testimony [10] -
 311:8, 317:11, 324:1,
 352:3, 387:19,
 421:25, 429:2,
 431:19, 445:16,
 461:13

text [1] - 363:25
thankfully [1] -
 394:13
thanking [1] - 329:23
THE [8] - 308:1,
 312:6, 318:1, 329:1,
 406:22, 407:5,
 423:18, 465:2
theft [1] - 448:22
themselves [5] -
 341:23, 348:13,
 384:1, 415:14, 469:21
thereabouts [1] -
 398:20
thereafter [1] -
 446:21
they've [5] - 391:25,
 397:15, 437:18,
 458:10
thinking [4] - 365:11,
 418:23, 419:2, 419:7
thinks [1] - 317:6
third [1] - 424:18
Thirty [1] - 397:12
thoughts [2] -
 317:15, 323:19
thousand [3] - 333:2,
 349:20, 441:8
Thousand [1] - 362:6
thousands [3] -
 372:24, 466:6, 466:16
threat [4] - 314:16,
 361:7, 361:21, 436:12
threatening [4] -
 362:3, 362:5, 440:3,
 445:6
threats [3] - 336:7,
 430:17, 458:10
three [14] - 320:23,
 322:10, 329:16,
 396:17, 397:17,
 398:19, 399:9,
 412:14, 422:11,
 422:17, 428:16,
 428:21, 465:15,
 469:19
Three [2] - 422:24,
 422:25
three-year [1] -
 422:17
throughout [6] -
 329:16, 340:18,
 344:13, 356:17,
 397:17, 408:21
throughs [1] -
 341:16
throw [1] - 322:2
TIME [1] - 308:12
timeframe [1] -
 311:19

timeline [3] - 452:10,
 458:24, 459:3
title [1] - 423:9
titled [2] - 422:6,
 423:8
TOC [2] - 372:11,
 372:12
Today [1] - 413:22
today [8] - 311:17,
 311:25, 321:17,
 383:18, 384:18,
 384:20, 384:21, 414:5
together [6] -
 337:23, 441:2,
 441:15, 446:16,
 447:16, 465:13
tomorrow [1] - 383:8
tone [2] - 321:21,
 340:25
took [10] - 314:15,
 352:12, 372:2,
 373:14, 414:11,
 420:19, 433:25,
 442:2, 443:6, 465:4
tools [1] - 393:17
top [2] - 373:21,
 379:20
Topic [1] - 452:3
topic [4] - 388:23,
 389:1, 389:3, 452:1
Torres [3] - 447:25,
 451:5, 451:9
tourniquet [1] -
 395:9
tourniquets [3] -
 322:25, 394:9, 394:24
Tourniquets [1] -
 394:19
tout [1] - 384:1
towards [2] - 425:3,
 429:10
towers [1] - 446:9
town [4] - 376:16,
 376:24, 390:6, 390:18
track [1] - 344:1
trade [2] - 347:21,
 347:24
trade-off [1] - 347:24
traffic [6] - 358:25,
 389:4, 439:15, 444:7,
 444:12, 464:13
tragedy [7] - 332:5,
 333:18, 334:20,
 357:17, 374:13,
 376:16, 381:21
tragic [1] - 331:5
train [10] - 322:4,
 370:12, 392:7,
 392:11, 396:20,
 410:2, 418:4, 433:3,

433:9, 443:19
trained [5] - 347:25,
 360:16, 361:6,
 363:10, 393:22
trainer [2] - 335:16,
 358:4
trainers [10] - 422:3,
 431:18, 431:24,
 432:2, 432:5, 432:10,
 432:14, 432:18,
 432:20, 433:1
training [145] - 321:5,
 321:15, 322:2, 322:3,
 322:24, 323:1, 323:2,
 332:25, 333:5,
 333:11, 333:12,
 335:9, 335:14,
 337:17, 337:24,
 338:5, 339:15, 340:8,
 340:24, 341:5, 348:2,
 348:23, 349:23,
 351:1, 353:9, 357:23,
 358:2, 359:11,
 359:16, 359:19,
 360:15, 360:19,
 360:20, 361:17,
 361:24, 370:11,
 371:10, 371:22,
 371:25, 375:2, 380:6,
 380:9, 380:20,
 382:24, 387:17,
 388:17, 388:21,
 388:24, 389:6, 389:7,
 389:8, 389:20,
 389:25, 390:7,
 390:10, 390:16,
 390:17, 390:21,
 391:2, 391:4, 391:5,
 391:11, 391:15,
 391:18, 391:24,
 392:1, 392:3, 392:10,
 392:20, 393:2, 393:3,
 393:6, 393:9, 393:13,
 393:25, 394:3,
 394:20, 394:23,
 395:2, 395:12,
 395:17, 396:3,
 396:14, 396:24,
 397:21, 397:25,
 398:1, 398:4, 398:17,
 398:19, 398:22,
 398:23, 399:7, 410:4,
 414:7, 414:21,
 415:22, 415:25,
 416:2, 416:4, 416:6,
 416:19, 417:1, 417:7,
 417:8, 417:10,
 417:11, 417:15,
 417:18, 418:2, 418:5,
 418:6, 418:15,
 418:21, 419:17,

- 419:23, 420:7, 420:8,
420:20, 420:23,
420:24, 421:1, 421:3,
421:5, 421:19,
421:23, 422:1,
422:11, 422:20,
423:5, 428:22, 432:1,
432:4, 432:25, 433:3,
433:5, 441:19, 442:1,
454:23, 455:14,
457:25, 467:2, 467:4
Training [3] - 322:2,
355:5, 387:22
trainings [14] -
330:2, 337:11,
338:15, 358:6, 358:8,
358:11, 396:7, 396:9,
396:17, 398:14,
399:1, 399:3, 399:4,
432:11
transcribed [1] -
424:6
transcript [3] -
317:20, 381:6, 471:8
TRANSCRIPT [1] -
308:9
transitioned [1] -
442:7
transmission [1] -
382:15
transport [1] -
374:21
transported [1] -
322:22
trap [1] - 361:19
Treijls [11] - 364:13,
365:18, 365:21,
368:19, 369:5,
369:13, 369:16,
369:24, 370:15,
370:21, 463:23
tremendous [1] -
315:7
trends [1] - 452:4
triage [1] - 322:17
tried [1] - 364:1
triplets [2] - 340:17,
365:6
trivialize [2] -
447:13, 448:11
trooper [1] - 359:2
troops [1] - 358:13
trucks [2] - 373:2,
411:25
true [5] - 403:15,
407:24, 411:7,
467:13, 471:8
truncates [1] -
330:21
trust [1] - 405:6
trusted [4] - 457:8,
458:2, 458:13, 460:22
truth [1] - 388:4
try [9] - 315:20,
333:12, 355:15,
410:14, 415:17,
436:19, 441:15,
465:1, 469:25
trying [13] - 315:2,
333:7, 344:1, 362:10,
374:11, 374:25,
413:5, 413:17, 418:1,
436:17, 442:15,
457:17
turmoil [1] - 372:25
turn [1] - 347:13
turned [2] - 319:10,
319:11
turnstiles [1] - 333:3
TV [1] - 424:10
twenty [3] - 333:2,
442:10
twenty-two [1] -
333:2
twin [1] - 446:9
Two [3] - 441:8,
452:13, 457:1
two [34] - 313:7,
321:7, 333:2, 340:17,
340:19, 345:1,
364:12, 365:4,
365:12, 366:6, 367:5,
378:10, 378:12,
383:4, 397:7, 415:11,
422:1, 422:11,
422:17, 424:19,
425:13, 425:19,
425:21, 426:11,
427:19, 428:4,
428:16, 445:21,
445:22, 461:9,
463:20, 464:1,
466:14, 466:17
two-fold [1] - 383:4
two-man [2] -
426:11, 428:4
two-year [1] - 422:17
type [7] - 314:3,
315:17, 330:14,
332:2, 332:4, 332:16,
333:8
typing [1] - 368:4
-
- U**
-
- ultimate** [6] - 315:2,
315:21, 354:15,
386:8, 387:11, 387:15
Ultimately [4] -
319:23, 319:25,
366:11, 432:8
ultimately [7] -
342:23, 366:10,
368:17, 387:3, 387:6,
437:23, 463:6
uncaptured [1] -
337:16
Under [1] - 430:3
under [25] - 312:2,
312:5, 313:13,
317:25, 366:2,
385:11, 385:17,
385:21, 386:4,
392:10, 394:20,
400:17, 402:3, 404:6,
404:17, 406:14,
406:16, 408:8,
408:12, 408:13,
417:20, 420:14,
431:12, 431:17
underlying [1] -
321:21
Undersheriff [4] -
461:15, 466:19,
468:5, 469:2
undersheriff [13] -
319:25, 320:2,
327:10, 329:15,
329:19, 332:24,
460:19, 463:10,
464:17, 465:5, 467:7,
467:9, 467:14
understood [9] -
320:25, 321:4,
362:23, 364:1, 374:8,
376:4, 385:16,
421:16, 459:6
Understood [1] -
318:1
undertone [1] -
314:6
unethical [1] -
316:12
unexpected [1] -
333:13
unfair [2] - 390:11,
469:16
unfitness [1] -
348:22
unfold [1] - 336:2
unfortunate [1] -
410:22
unfortunately [3] -
411:1, 412:14, 433:14
uniform [1] - 343:8
unique [2] - 332:6,
332:21
unit [4] - 349:11,
349:12, 349:24, 453:1
United [3] - 376:23,
403:2, 414:3
units [4] - 337:23,
342:5, 425:3, 455:23
universe [1] - 465:24
unknown [1] -
430:17
unless [1] - 435:25
unlike [1] - 434:16
unprofessional [1] -
316:12
unravel [1] - 372:3
unsafe [2] - 432:22,
440:1
up [38] - 313:9,
329:24, 338:24,
344:14, 351:15,
357:1, 358:18, 359:1,
359:2, 359:4, 364:8,
367:18, 368:6,
370:16, 372:11,
372:17, 372:23,
373:14, 374:20,
377:11, 378:19,
382:11, 388:8,
402:19, 404:20,
404:23, 406:22,
418:10, 423:20,
424:9, 427:3, 427:13,
432:6, 444:9, 461:6,
461:10, 464:3, 468:14
update [1] - 451:13
upper [5] - 320:24,
321:8, 337:14,
337:15, 337:18
upper-command [1]
- 321:8
use-of-force [1] -
389:8
user [2] - 354:16,
354:17
user-friendly [1] -
354:17
utilized [1] - 442:19
-
- V**
-
- vacancies** [2] -
396:13, 432:19
vacancy [1] - 396:25
vacant [1] - 396:12
valid [1] - 450:19
validity [2] - 363:7,
363:8
variables [2] -
373:20, 397:2
variety [1] - 400:17
venue [3] - 324:10,
412:6, 443:19
venues [4] - 329:16,
419:15, 419:17,
419:19
version [3] - 319:20,
353:22, 462:25
versions [5] -
328:16, 466:2,
466:15, 466:17,
469:19
versus [1] - 427:19
vettied [3] - 319:7,
319:10, 319:13
vetting [1] - 467:3
victim [1] - 446:3
victims [2] - 322:23,
338:1
video [1] - 452:11
view [1] - 468:3
views [1] - 379:10
Vigilant [2] - 441:20,
443:21
vigilant [4] - 321:20,
321:21, 323:2
vigilantly [1] -
467:25
Vincent [1] - 447:25
violated [1] - 316:16
violations [1] - 367:4
violence [1] - 389:5
virgin [1] - 374:25
vis-à-vis [1] - 432:3
visible [1] - 358:13
Volume [2] - 311:2,
470:10
VOLUME [1] - 308:7
voluntary [1] - 403:8
volunteered [1] -
337:25
vote [1] - 314:13
voters [1] - 316:19
vulnerable [3] -
340:12, 412:1, 412:2
-
- W**
-
- wait** [1] - 430:23
waiting [3] - 400:25,
401:5, 431:9
walk [2] - 341:16,
365:9
walk-throughs [1] -
341:16
wants [1] - 403:20
Wasserman [2] -
457:4, 457:19
watch [4] - 429:25,
430:3, 430:4
ways [1] - 457:20
weapons [4] -
367:11, 369:6, 412:1,
429:24
wear [2] - 340:15,

340:16
website [1] - 364:9
Wednesday [1] - 311:4
week [6] - 311:15,
324:8, 337:7, 383:8,
397:4, 397:7
weeks [3] - 452:8,
457:1, 458:6
weigh [5] - 386:22,
386:23, 451:3,
456:11, 463:14
well-known [1] - 314:12
West [2] - 365:4,
371:7
whatsoever [2] - 355:10, 363:7
wheel [1] - 356:18
whole [6] - 340:20,
358:10, 415:1, 417:3,
427:8, 451:25
wholly [1] - 363:23
widely [1] - 329:9
wife [1] - 384:18
willing [4] - 339:4,
438:10, 438:15,
438:20
wish [4] - 365:7,
365:8, 440:13, 446:7
witness [11] - 312:4,
313:25, 317:22,
343:25, 385:3,
385:11, 388:5, 388:6,
388:10, 388:11,
464:23
WITNESS [7] - 310:3, 312:6, 318:1,
329:1, 406:22, 407:5,
465:2
witnessed [3] - 341:8, 360:18, 426:3
WITNESSES [1] - 310:1
witnesses [5] - 312:24, 323:22,
387:25, 388:1, 431:20
witnessing [1] - 362:2
woman [4] - 321:14,
348:7, 377:8, 446:3
women [6] - 340:14,
341:18, 345:23,
383:20, 464:5, 469:11
wondering [1] - 418:13
word [13] - 322:2,
330:24, 357:18,
362:25, 383:23,
408:4, 408:7, 411:9,
418:16, 430:8,
453:14, 453:16,
453:22
words [8] - 367:18,
399:19, 399:23,
400:7, 402:19, 421:8,
430:19, 462:15
work-up [1] - 461:6
world [1] - 410:24
worried [2] - 344:17,
431:10
worse [1] - 407:1
worthwhile [1] - 329:25
write [3] - 372:20,
453:23, 459:11
writes [1] - 457:24
writing [1] - 311:24
written [8] - 363:9,
372:21, 421:8,
421:13, 421:20,
421:23, 453:23,
455:11
written-down [1] - 421:20
wrongdoings [1] - 314:25
wrote [5] - 369:13,
400:3, 453:21, 455:9,
468:19

Y

yard [1] - 365:6
Year [3] - 422:12,
422:13, 422:14
year [18] - 334:25,
335:22, 335:23,
344:6, 365:12, 370:4,
384:7, 396:18,
397:10, 397:17,
418:9, 420:10,
420:12, 422:17,
422:19, 448:6
years [20] - 315:6,
334:22, 334:23,
357:15, 365:3,
388:21, 392:18,
398:19, 399:9,
412:15, 412:24,
413:24, 422:12,
422:24, 422:25,
450:4, 450:20,
454:21, 455:12
yesterday [10] - 312:2, 312:17, 327:9,
328:20, 343:25,
387:19, 391:23,
414:5, 446:1, 447:13
York [3] - 315:6,
458:7, 458:8
young [1] - 321:1
yourself [2] - 360:22,
430:16