

1 IN THE CIRCUIT COURT OF THE FIFTEENTH JUDICIAL CIRCUIT
 IN AND FOR PALM BEACH COUNTY, FLORIDA
2 CASE No. 50-2011-000246 XXXX MB
3

JESS R. SANTAMARIA,

4

 Plaintiff,

5

-vs-

6

ANDREW F. SCHALLER,

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 Defendant.



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 DEPOSITION OF JOHNNIE R. EASTON

13

 Wednesday, March 28, 2012

14

 12:00 p.m. - 12:30 p.m.

15

 105 S. Narcissus Avenue

 Suite 400

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 West Palm Beach, Florida 33401

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Reported By:

Pamela J. Sullivan, RPR, FPR, CLR

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Signature Court Reporting, Inc.

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1 APPEARANCES:

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3 On behalf of the Plaintiff:

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10 On behalf of the Defendant:

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I N D E X

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WITNESS: DIRECT CROSS REDIRECT RE CROSS

JOHNNIE R. EASTON

BY MS. KITTERMAN 4

BY MR. BARSKY 27

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N O E X H I B I T S M A R K E D

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P R O C E E D I N G S

- - -

Deposition taken before Pamela J. Sullivan,
Registered Professional Court Reporter and Notary Public
in and for the State of Florida at Large, in the above
cause.

- - -

Thereupon,

JOHNNIE R. EASTON,

having been first duly sworn or affirmed, was examined
and testified as follows:

THE WITNESS: I do.

DIRECT EXAMINATION

BY MS. KITTERMAN:

Q. Good afternoon. My name is
Christina Kitterman. I've called you here to testify in
a case called Mr. Jess Santamaria versus
Mr. Andrew Schaller. You have been called because you
were listed as a witness on Mr. Santamaria's witness
list for trial. So I need to call you to find out what
you know about this case.

Have you ever given a deposition before?

A. No.

Q. Okay. A few things with depositions. If I
ask you a question and you don't understand what it is,

1 please let me know and I will rephrase it or I will try
2 and restate it so that you understand the question.

3 A. Okay.

4 Q. When you answer questions, answer them
5 audibly so that we know what you are saying. Instead of
6 shaking your head, say yes or no.

7 A. Okay.

8 Q. And if you have any other questions during
9 the deposition, I'll be happy to see if I can answer
10 them for you.

11 A. Okay.

12 Q. Okay. Please state your full name for the
13 record.

14 A. Johnnie Easton.

15 Q. Johnnie, what do you do for work?

16 A. I work for Palm Beach County.

17 Q. What is your position with Palm Beach County?

18 A. I'm administrative assistant to
19 Commissioner Santamaria.

20 Q. When did you meet Mr. Santamaria?

21 A. Probably around 1992 or '3.

22 Q. How did you meet him?

23 A. My husband started a newspaper in the western
24 communities and he was one of the advertisers.

25 Q. Mr. Santamaria was one of the advertisers?

1 A. Yes.

2 Q. Okay. How did you come to work for
3 Mr. Santamaria?

4 A. I worked for Commissioner Masilotti. And
5 then when he did not run again and
6 Commissioner Santamaria won the seat, he retained me.

7 Q. Okay. And do you know Mr. Andrew Schaller?

8 A. Yes.

9 Q. How do you know him?

10 A. He's been in a lot of accounting meetings and
11 he's come to our community forums.

12 Q. Okay.

13 A. And he's come to our office.

14 Q. Okay. Do you know since when, like what year
15 did you meet Mr. Schaller?

16 A. 2008 or '09.

17 Q. Okay. Are you aware of the lawsuit that was
18 filed by Mr. Santamaria against Mr. Schaller?

19 A. Yes.

20 Q. Okay. What is your understanding of the
21 lawsuit?

22 A. That Commissioner Santamaria is suing
23 Andy Schaller for slander and libel, defamation.

24 Q. Do you know what it is based on?

25 A. The 118-page thing that Mr. Schaller put out.

1 Q. Okay. And when you say the 118-page thing,
2 are you referring to the request for inquiry?

3 A. Yes.

4 Q. Okay. Have you ever seen the request for
5 inquiry?

6 A. Yes.

7 Q. Who showed it to you?

8 A. I think --

9 MR. BARSKY: Object to the form.

10 BY MS. KITTERMAN:

11 Q. You can answer.

12 A. I think Commissioner Santamaria actually
13 showed it to me.

14 Q. Okay. Did you read the entire request for
15 inquiry?

16 A. Yes.

17 Q. Okay.

18 A. Well, not all the legal stuff that was in
19 there.

20 Q. Okay.

21 A. There was a lot of stuff in there that...

22 Q. Okay. Did you happen to read the Exhibit 7
23 of the request for inquiry that included a felony
24 judgment for a Jesus R. Santamaria?

25 A. Yes.

1 Q. Do you know who Jesus R. Santamaria is?

2 A. That's Commissioner Santamaria, I understand.

3 Q. Okay. How do you understand that?

4 A. That's his name, his real name.

5 Q. Okay. How do you know that's his real name?

6 A. I actually don't.

7 Q. Okay.

8 A. I don't know, maybe it was Cindy or somebody
9 in the office told me.

10 Q. Okay. What is your opinion of
11 Mr. Santamaria?

12 A. He's a very generous man. He's been good in
13 that he kept me, and he does a lot of charity work.

14 Q. Okay. Did the request for inquiry that you
15 reviewed change your opinion of Mr. Santamaria?

16 A. No.

17 Q. Okay. Did the felony record included in the
18 request for inquiry change your opinion of
19 Mr. Santamaria?

20 A. No.

21 Q. Have you ever conducted a background search
22 on Mr. Santamaria?

23 A. No.

24 Q. Have you ever conducted a background search
25 on any of the other County Commissioners?

1 A. No.

2 Q. Okay. Are you aware of anyone that does
3 conduct background searches on any of the commissioners
4 or the incoming commissioners?

5 A. No. I mean, I don't.

6 Q. Right. Do you know of anybody that does?

7 A. No. No.

8 Q. Do you know or have any facts that show that
9 Mr. Schaller knew that that felony judgment did not
10 belong to Mr. Santamaria?

11 A. I'm sorry. Say that again?

12 Q. It's okay. Do you know of any facts that
13 would show that Mr. Schaller actually knew that the
14 felony judgment did not belong to Mr. Santamaria?

15 A. No.

16 Q. Okay. Do you know any facts to show that
17 Mr. Schaller purposely did not research further to find
18 out whether that felony judgment referred to
19 Mr. Santamaria?

20 A. Do I know if he researched further?

21 Q. If he purposely did not research further.

22 A. No, I -- no.

23 Q. Okay. Have you ever heard from anybody that
24 Mr. Schaller knew or should have known from any other
25 individual that the felony judgment did not relate to

1 Mr. Santamaria?

2 A. State it again, please?

3 Q. Okay. No problem.

4 Have you ever heard that Mr. Schaller knew or
5 should have known from any other person that the felony
6 judgment in the request for inquiry did not belong to
7 Mr. Santamaria?

8 MR. BARSKY: Object to the form.

9 THE WITNESS: No.

10 BY MS. KITTERMAN:

11 Q. Okay. Are you aware that Mr. Santamaria went
12 through ethic inquiries based on the subjects raised in
13 the request for inquiry?

14 A. There was an IG investigation, yeah.

15 Q. Okay. Do you know what the IG investigation
16 addressed? And when you say IG, I'm assuming you
17 mean --

18 A. Inspector General.

19 Q. Inspector General. Okay.

20 Do you know what issues specifically the
21 Inspector General addressed -- excuse me -- in the
22 request for inquiry?

23 MR. BARSKY: Object to the form.

24 BY MS. KITTERMAN:

25 Q. You can answer. He's just going to make

1 objections for the record. You can still answer.

2 A. You have to say it again now.

3 Q. Sure.

4 MS. KITTERMAN: Can you read back my
5 question.

6 (Whereupon, the requested portion of the
7 record was read aloud by the Court Reporter.)

8 THE WITNESS: I think all of them were looked
9 into.

10 BY MS. KITTERMAN:

11 Q. Okay. Do you know what the Inspector General
12 rulings were?

13 A. I was cleared. I think Dennis's comp time
14 was questioned anyway. I don't know what the outcome of
15 that was. And then the commissioner should not have
16 gotten rid of his calendars.

17 Q. When you say calendars, do you mean his
18 pocket calendars?

19 A. Pocket calendars.

20 Q. Okay. Was there any other rulings that you
21 know of in that Inspector General report?

22 MR. BARSKY: Object to the form.

23 THE WITNESS: I can't remember if there were.
24 I don't think there were, but I can't remember.

25

1 BY MS. KITTERMAN:

2 Q. Okay. Are you aware of any investigation
3 done by the Palm Beach Ethics Commission of
4 Mr. Santamaria as a result of the request for inquiry?

5 A. The Commission on Ethics?

6 Q. The Palm Beach Commission on Ethics.

7 A. Yeah, the Commission on Ethics did look at
8 it, but they did not rule on anything because it was not
9 in their jurisdiction, I believe.

10 Q. Okay. Was there any other agency that you
11 can remember that did an investigation of Mr. Santamaria
12 as a result of the request for inquiry?

13 A. I know that something went to the State
14 because the commissioner went to Tallahassee for a
15 hearing there.

16 Q. Okay.

17 A. I don't know the --

18 Q. Do you know when he went to the State?

19 A. I don't know -- I assume the same thing did,
20 but the commissioner was cleared on that one, so...

21 Q. Okay. Do you know whether any of the
22 investigations revolved around or specifically related
23 to the felony judgment that was contained within that
24 request for inquiry?

25 A. One more time.

1 MS. KITTERMAN: Can you read back, please.

2 (Whereupon, the requested portion of the
3 record was read aloud by the Court Reporter.)

4 THE WITNESS: That and only that. I don't
5 think so. I think it was the whole thing, the
6 whole...

7 BY MS. KITTERMAN:

8 Q. The whole document?

9 A. The whole -- yeah, whatever it was, the whole
10 118.

11 Q. Have you talk to anyone else about this
12 lawsuit besides Mr. Santamaria?

13 A. I did talk to Mr. Weisman. I told him that I
14 got subpoenaed.

15 Q. And what did he say?

16 A. He said I might want to talk to the County
17 attorney to see what to expect. So I talked to
18 Denise Nieman briefly.

19 Q. Don't tell me what you talked about with the
20 County attorney.

21 Did Mr. Weisman tell you anything else?

22 A. No, he just said to talk to Denise.

23 Q. Okay. Did you talked to anyone else about
24 the actual contents of the lawsuit?

25 A. No, I've not actually seen the contents of

1 the lawsuit.

2 Q. Okay. Fair enough.

3 You've talked to Mr. Santamaria about this
4 lawsuit?

5 A. Yeah, in passing for the most part.

6 Q. Okay. Did he ever tell you or address the
7 convicted felon or the felony judgment that was
8 addressed in the request for inquiry?

9 A. Did he ever tell me about it?

10 Q. Yes.

11 A. That it was in there?

12 Q. Yes.

13 A. I don't know if he specifically told me. I
14 saw it in there. I've heard him on the telephone
15 telling other people, but not me specifically.

16 Q. Did Mr. Santamaria ever tell you that he was
17 not a convicted felon?

18 A. I don't think that ever came into question.
19 I didn't ask him.

20 Q. Okay. Did anyone else tell you that
21 Mr. Santamaria was not a convicted felon?

22 A. No.

23 Q. Okay. Did anybody else ask you if
24 Mr. Santamaria was a convicted felon?

25 A. No.

1 Q. Do you know if Mr. Santamaria ever told
2 Mr. Schaller he was not a convicted felon?

3 A. I -- if he did, I wasn't there. So I don't
4 know.

5 Q. Yeah, I only want you to tell me what you
6 actually know.

7 A. Yeah.

8 Q. Okay. Do you know whether Mr. Schaller ever
9 retracted the portion that relates to the felony
10 judgment to the public or to anybody else?

11 A. I don't think it was retracted in the
12 newspaper. But he did on the -- it was a radio show.

13 Q. On a radio show?

14 A. Yeah.

15 Q. Did you actually hear it?

16 A. I heard part of it.

17 Q. Okay. Have you ever heard of anybody talking
18 about the felony judgment in connection with
19 Mr. Santamaria?

20 A. To me?

21 Q. Yes, to you.

22 A. No.

23 Q. Okay. How long have you worked for Palm
24 Beach County?

25 A. Eight years.

1 Q. And you've worked for Mr. Santamaria, I guess
2 since 2006 --

3 A. Correct.

4 Q. -- is that correct?

5 What is your opinion of Mr. Schaller?

6 A. I think he's very -- he's always very polite
7 and he's obviously a successful man. He spends a lot of
8 time at the County.

9 Q. Have you ever heard Mr. Schaller make any
10 malicious statements toward Mr. Santamaria or about
11 Mr. Santamaria?

12 A. No, not --

13 MR. BARSKY: Object to the form.

14 THE WITNESS: Not to me, no.

15 BY MS. KITTERMAN:

16 Q. Okay. Have you ever seen Mr. Schaller act in
17 any way towards Mr. Santamaria that you feel was
18 malicious?

19 A. No.

20 Q. From your experience, how would you describe
21 Mr. Schaller's conduct toward Mr. Santamaria?

22 MR. BARSKY: Object to the form.

23 THE WITNESS: He's very, very persistent.

24 BY MS. KITTERMAN:

25 Q. What do you mean by this?

1 A. Up until recently, he was at almost every
2 Board meeting discussing the road, Fargo Road -- Avenue.

3 Q. Did Mr.-- go ahead. I didn't mean to cut you
4 off.

5 A. He just addresses him on the commission dais.

6 Q. Okay. Do you know what he was addressing
7 specifically?

8 A. Fargo Avenue issue.

9 Q. Okay. Do you know whether Mr. Schaller asked
10 for Mr. Santamaria's help on the Fargo Avenue issue?

11 A. Yes.

12 Q. Yes, you know?

13 A. Yes, he did.

14 Q. He did ask. Okay. Do you know what help he
15 asked for?

16 A. Originally, it was to get the road improved.

17 Q. Okay. And then what did it turn out to be?

18 A. It's really been all along, I think it's been
19 improvement of the road. In the beginning, it was just
20 to correct an engineering mistake.

21 Q. Okay. Were you present when Mr. Santamaria
22 agreed to help Mr. Schaller?

23 MR. BARSKY: Object to the form.

24 THE WITNESS: I was in the office, but I
25 wasn't in the actual meeting.

1 BY MS. KITTERMAN:

2 Q. Do you know that Mr. Santamaria actually
3 agreed to help Mr. Schaller?

4 A. Yes.

5 Q. Do you think what Mr. Schaller was asking for
6 with regard to Fargo Avenue was a reasonable request
7 from the County?

8 A. Yes.

9 Q. Do you think the County's handling of the
10 Fargo Avenue was fair and just to the residents of
11 Fargo?

12 MR. BARSKY: Object to the form.

13 THE WITNESS: It -- the whole thing could
14 have been handled a lot better in my opinion. So
15 it wasn't fair to certain people.

16 BY MS. KITTERMAN:

17 Q. Okay. Do you think that Mr. Schaller was
18 trying to have the Fargo Avenue road paved for his own
19 personal gain?

20 A. I don't know about his own personal gain. It
21 would have improved the road for the whole -- for
22 everybody on the road, for the whole neighborhood
23 actually.

24 Q. Okay. Do you believe that the County did
25 everything in its power to fairly resolve the

1 Fargo Avenue situation?

2 MR. BARSKY: Object to the form.

3 THE WITNESS: No.

4 BY MS. KITTERMAN:

5 Q. What do you think they could have done
6 differently?

7 MR. BARSKY: Object to the form.

8 THE WITNESS: I think that had the entire
9 neighborhood been done -- and this is only my
10 opinion.

11 BY MS. KITTERMAN:

12 Q. Yes, that's all I'm asking for.

13 A. If the entire neighborhood had been done at
14 one time, all of the roads paved at one time, it
15 wouldn't have been an issue. But it was kind of
16 piecemealed and it didn't go well. Way back from '04,
17 '05, whenever they started doing the water installations
18 they did, it just got -- it just went downhill from
19 there.

20 Q. Right. Okay. Had you been working at the
21 County when it originally started?

22 A. Yes.

23 Q. Okay. Did you feel that Mr. Schaller's
24 request for inquiry was a malicious attack on
25 Mr. Santamaria?

1 MR. BARSKY: Object to the form.

2 THE WITNESS: I think that Mr. Schaller
3 didn't believe that we were doing the best that we
4 could do in the office. And so when he found out
5 the opportunity to point out things that we weren't
6 doing correctly, he did.

7 BY MS. KITTERMAN:

8 Q. Do you know of any constituent or media
9 person that contacted Mr. Santamaria's office to ask
10 about the felony judgment for Jesus R. Santamaria?

11 A. I don't know specifically about that one, but
12 the TV station did call that day. But I don't know that
13 I got the phone. I know they came and interviewed him,
14 but I don't know about when.

15 Q. When you say that day, what day are you
16 talking about?

17 A. The day that the request for inquiry came
18 out.

19 Q. Okay. So the news station came up to
20 interview Mr. Santamaria that day?

21 A. Correct.

22 Q. Did anybody else call about the request for
23 inquiry?

24 A. Not that I answered the phone. I was out
25 part of that day so, you know, it could have. But I

1 didn't answer the phone.

2 Q. Okay. Other than that one day, did any
3 person ever call to follow up and ask about
4 Mr. Santamaria's -- whether that felony record related
5 to Mr. Santamaria?

6 A. Not that I know of.

7 Q. Okay. Do you know if any constituent or
8 media representative attended any of the Board of
9 County Commissioner meetings and asked about that felony
10 record and asked whether it related to Mr. Santamaria?

11 MR. BARSKY: Object to the form.

12 THE WITNESS: Not that I remember, no.

13 BY MS. KITTERMAN:

14 Q. Did your opinion of Mr. Santamaria change in
15 any way because of the felony judgment that was included
16 in the request for inquiry?

17 A. No.

18 Q. To the best of your knowledge, how many times
19 has the County purchased pocket calendars for
20 Mr. Santamaria without reimbursing him?

21 A. Say it again?

22 Q. To the best of your knowledge, how many
23 times -- well, first, has the County ever purchased
24 pocket calendars for Mr. Santamaria?

25 A. Yes.

1 Q. Has he ever reimbursed the County for pocket
2 calendars?

3 A. Yes.

4 Q. How many times?

5 MR. BARSKY: Object to the form.

6 THE WITNESS: I know of one. There could be
7 more, but I know of one.

8 BY MS. KITTERMAN:

9 Q. Okay.

10 A. Wait, did the County reimburse him?

11 Q. Did -- no. Did Mr. Santamaria reimburse the
12 County --

13 A. Yes.

14 Q. -- for purchasing his --

15 A. Once that I know of.

16 Q. -- pocket calendars?

17 Okay. And those pocket calendars that
18 Mr. Santamaria has, does he carry them with him?

19 MR. BARSKY: Object to the form.

20 THE WITNESS: Yes.

21 BY MS. KITTERMAN:

22 Q. Do you know whether he syncs the pocket
23 calendars that he carries with him with the County
24 electronic calendar?

25 A. He doesn't use the computer. I print out the

1 calendar in a hard copy and give it to him and then he
2 writes it from there into his pocket calendar.

3 Q. Okay. So you don't know if he actually -- or
4 do you know if he actually enters the time or whatever
5 appointments he has in his pocket calendar into his
6 electronic calendar?

7 MR. BARSKY: Object to the form.

8 THE WITNESS: I assume he does. I don't do
9 it though, he does.

10 BY MS. KITTERMAN:

11 Q. How many sets of calendars does
12 Mr. Santamaria have?

13 MR. BARSKY: Object to the form.

14 THE WITNESS: Well, I keep the electronic
15 calendar and then his desk calendars.

16 BY MS. KITTERMAN:

17 Q. Okay.

18 A. And he keeps the one in his pocket. So
19 three, if you count his personal calendar.

20 Q. Okay. So he has an electronic calendar, a
21 desk calendar, and a pocket calendar?

22 MR. BARSKY: Object to the form.

23 THE WITNESS: Correct.

24 BY MS. KITTERMAN:

25 Q. Are the desk calendars coordinated with the

1 electronic calendar?

2 A. Yes.

3 Q. Do you know whether the pocket calendar and
4 the desk calendar are the same?

5 A. I would have to assume so because he puts the
6 same meetings in there. Otherwise, he wouldn't know
7 where to show up, so...

8 Q. Okay. In 2010, did Mr. Santamaria ask you to
9 compile information on how much money was spent in the
10 Glades since he took office?

11 A. Yes.

12 Q. What did you do with that information when
13 you completed it?

14 A. I gave it to the commissioner.

15 Q. And what did the commissioner do with it, do
16 you know?

17 A. No.

18 Q. Did Mr. Santamaria ask you to send the
19 documents to a Francine Nelson?

20 MR. BARSKY: Object to the form.

21 THE WITNESS: Yes.

22 BY MS. KITTERMAN:

23 Q. Did you send them?

24 A. Yes.

25 Q. Did he ask you to send those documents to

1 Jermaine Webb?

2 A. Yes.

3 Q. And did you send them?

4 A. Yes.

5 Q. Have you ever heard of Mr. Santamaria

6 referring to Mr. Schaller as an idiot?

7 A. I may have read that in the paper. I

8 don't...

9 Q. Have you ever heard him, Mr. Santamaria refer

10 to Mr. Schaller as a lunatic?

11 A. I think that was on one of the broadcasts.

12 Q. On one of the broadcasts?

13 A. On TV, yeah.

14 Q. Did Mr. Santamaria -- you heard --

15 A. Or the newspaper, I can't remember. It was

16 one of them.

17 Q. Have you ever heard Mr. Santamaria say that

18 Mr. Schaller was going to pay for printing this request

19 for inquiry?

20 A. In what way?

21 Q. In any way.

22 A. I think he said he was going to be held

23 accountable in court.

24 Q. For what?

25 A. For the request for inquiry.

1 Q. Okay. You said he doesn't -- I think you
2 just said that Mr. Santamaria doesn't use a computer,
3 earlier?

4 A. Right.

5 MR. BARSKY: Object to the form.

6 BY MS. KITTERMAN:

7 Q. So who would update his electronic calendar?

8 A. I would.

9 Q. Do you do that?

10 A. Yes.

11 Q. Do you know of anyone else that may have any
12 information on the issues that were brought forward in
13 the request for inquiry?

14 A. Dennis Lipp was involved in that. And I
15 don't think Chuck was. So just Dennis.

16 Q. Okay. Do you know anyone else that might
17 have any information with regard to the issues that are
18 present in this lawsuit?

19 A. Say it again?

20 Q. Do you know anyone else who would have any
21 information relating to the issues that are present in
22 this lawsuit?

23 A. Well, I haven't seen the lawsuit, but I
24 assume it's just because of the request for inquiry.

25 Q. Okay.

1 A. So would anybody else have information about
2 the request for inquiry or the lawsuit itself?

3 Q. The lawsuit itself is based on the felony
4 record, and that's it. Not the entire request for
5 inquiry.

6 A. Oh.

7 Q. So would you have any -- or do you know of
8 anybody that could testify one way or the other with
9 regard to the felony record?

10 MR. BARSKY: Object to the form.

11 THE WITNESS: No.

12 MS. KITTERMAN: Okay. I think that's it.

13 I'm done.

14 MR. BARSKY: I'm going to ask you a couple of
15 questions, ma'am.

16 CROSS EXAMINATION

17 BY MR. BARSKY:

18 Q. Have you ever known Jess by any other name
19 other than Jess Santamaria?

20 A. No.

21 Q. You mentioned earlier that you thought Jess's
22 name was Jesus, why was that?

23 A. I think Cindy told me, the lady that used to
24 be in our office.

25 Q. She used to be in your office. Would you

1 tell us who she was?

2 A. Cindy Verner was the administrative assistant
3 when the commissioner took office.

4 Q. Do you know why she would have thought that?

5 MS. KITTERMAN: Object to form.

6 THE WITNESS: No.

7 BY MR. BARSKY:

8 Q. Do you live in Palm Beach County?

9 A. Yes.

10 Q. How long have you lived in Palm Beach County?

11 A. Twenty -- since 1990.

12 Q. About 22 years at this point?

13 A. Yes.

14 Q. Are you aware of Jess Santamaria's -- are you
15 aware of the general reputation of Jess Santamaria in
16 the Palm Beach County community?

17 MS. KITTERMAN: Object to the form.

18 THE WITNESS: He's got a reputation for being
19 very charitable and community oriented.

20 BY MR. BARSKY:

21 Q. Are you aware of any specific instances of
22 conduct by Jess Santamaria that demonstrate his
23 character?

24 A. He gives his salary to charity.

25 Q. Anything else?

1 A. He volunteers on a lot of boards and
2 committees.

3 Q. Does he have a reputation in the community as
4 an honest man?

5 A. As far as I know.

6 Q. Does he have a reputation in the community as
7 an honorable man?

8 MS. KITTERMAN: Object to the form.

9 THE WITNESS: As far as I know.

10 BY MR. BARSKY:

11 Q. I think you've said this already, but does he
12 have a reputation in the community as a charitable man?

13 A. Yes.

14 Q. Does he have a reputation in the community as
15 a law-abiding man?

16 A. Yes.

17 MR. BARSKY: That's all I have.

18 MS. KITTERMAN: Nothing further.

19 (Discussion held off the record.)

20 (Deposition concluded at 12:30 p.m.)

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CERTIFICATE OF OATH

THE STATE OF FLORIDA
COUNTY OF PALM BEACH

I, the undersigned authority, certify that
JOHNNIE R. EASTON personally appeared before me and was
duly sworn.

Dated this 29th day of March, 2012.

Pamela J. Sullivan, RPR, FPR, CLR
Notary Public - State of Florida
My Commission Expires: June 5, 2014
My Commission No.: DD 993731

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C E R T I F I C A T E

THE STATE OF FLORIDA
COUNTY OF PALM BEACH

I, Pamela J. Sullivan, Registered Professional Reporter and Notary Public in and for the State of Florida at large, do hereby certify that I was authorized to and did report said deposition in stenotype; and that the foregoing pages are a true and correct transcription of my shorthand notes of said deposition.

I further certify that said deposition was taken at the time and place hereinabove set forth and that the taking of said deposition was commenced and completed as hereinabove set out.

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

The foregoing certification of this transcript does not apply to any reproduction of the same by any means unless under the direct control and/or direction of the certifying reporter.

Dated this 29th day of March, 2012.

Pamela J. Sullivan, RPR, FPR, CLR

1 March 29, 2012
2 JOHNNIE R. EASTON
6706 Westview Drive
3 Lantana, FL 33462
4 IN RE: SANTAMARIA V. SCHALLER
5 CASE NO.: 50-2011-000246 XXXX MB
6 Dear Ms. Easton:

7 Please take notice that on Wednesday, the 28th of
8 March, 2012, you gave your deposition in the
9 above-referred matter. At that time, you did not waive
signature. It is now necessary that you sign your
deposition.

10 Please call our office at the below-listed number
11 to schedule an appointment between the hours of 9:00
a.m. and 4:30 p.m., Monday through Friday, at our
office.

12 If you do not read and sign the deposition within a
13 reasonable time, the original, which has already been
14 forwarded to the ordering attorney, may be filed with
the Clerk of the Court. If you wish to waive your
signature, sign your name in the blank at the bottom of
this letter and return it to us.

15 Very truly yours,
16

17 _____
Pamela J. Sullivan, RPR, FPR, CLR
18 SIGNATURE COURT REPORTING, INC.
105 S. Narcissus Avenue, Suite 400
West Palm Beach, Florida 33401
19 561.659.2120
20

21 I do hereby waive my signature.
22

23 _____
JOHNNIE R. EASTON

24 cc via transcript:
Christina M. Kitterman, Esquire
Daniel J. Barsky, Esquire
25

C E R T I F I C A T E

- - -

THE STATE OF FLORIDA

COUNTY OF PALM BEACH

I hereby certify that I have read the foregoing deposition by me given, and that the statements contained herein are true and correct to the best of my knowledge and belief, with the exception of any corrections or notations made on the errata sheet, if one was executed.

Dated this ____ day of _____, 2012.

JOHNNIE R. EASTON

E R R A T A S H E E T

IN RE: SANTAMARIA V. SCHALLER
CR: PAMELA J. SULLIVAN, RPR, FPR, CLR
DEPOSITION OF: JOHNNIE R. EASTON
DATE TAKEN: March 28, 2012

 DO NOT WRITE ON TRANSCRIPT - ENTER CHANGES HERE
PAGE # LINE # CHANGE REASON

Please forward the original signed errata sheet to this office so that copies may be distributed to all parties. Under penalty of perjury, I declare that I have read my deposition and that it is true and correct subject to any changes in form or substance entered here.

DATE: _____