

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,

7

Defendant.



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12

DEPOSITION OF VICTORIA J. SANTAMARIA

13

Monday, March 12, 2012

14

11:30 a.m. - 1:00 p.m.

15

525 Okeechobee Boulevard

Suite 1100

16

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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APPEARANCES:

On behalf of the Plaintiff:

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On behalf of the Defendant:

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Present:

ANDREW F. SCHALLER

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I N D E X
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WITNESS: DIRECT CROSS REDIRECT RECROSS
VICTORIA SANTAMARIA
BY MS. KITTERMAN 4
BY MR. BARSKY 71

- - -
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,

VICTORIA J. SANTAMARIA,

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

THE WITNESS: Yes.

DIRECT EXAMINATION

BY MS. KITTERMAN:

Q. Good morning, Ms. Santamaria.

A. Good morning.

Q. My name is Christina Kitterman. I am the
attorney for the defendant Andrew Schaller. We have
called you for a deposition in this case because you've
been listed as a witness. Have you ever had your
deposition taken before?

A. No.

Q. Okay. Let me just tell you a few rules. As
I ask you questions, if you don't understand the
question, please let me know, I will be happy to restate

1 or rephrase it. If you need a break, please let me
2 know, I will be happy to give you a break. Please
3 answer all questions saying yes or no, rather than
4 uh-huh or huh-uh, because we won't be able to understand
5 that later.

6 A. Okay.

7 Q. Okay. And, again, if you have any questions
8 for me, feel free to ask; okay?

9 A. Okay.

10 Q. Will you please state your full legal name
11 for the record?

12 A. Victoria Jison Santamaria.

13 Q. Can you spell that?

14 A. V-i-c-t-o-r-i-a, I usually just carry J.

15 Q. Uh-huh.

16 A. And Santamaria, S-a-n-t-a-m-a-r-i-a.

17 Q. Will you please spell the middle name for us?

18 A. J-i-s-o-n.

19 Q. Okay. Is Jison your maiden name or your
20 middle name?

21 A. Maiden name.

22 Q. Okay. Do you have a middle name?

23 A. No.

24 Q. No? Okay. Where were you born?

25 A. Philippines.

1 Q. Philippines. Where exactly?

2 A. Silay, S-i-l-a-y, Negros Occidental.

3 Philippines. N-e-g-r-o-s, and then Occidental,

4 Philippines.

5 Q. And you stated your maiden name is, Jison?

6 A. Yes.

7 Q. Miss Santamaria, have you been married?

8 A. I am married.

9 Q. You are currently married. When did you get

10 married?

11 A. July 10th, 1968.

12 Q. And who did you marry?

13 A. Jess Santamaria.

14 Q. Where did you get married?

15 A. Philippines.

16 Q. Where in the Philippines?

17 A. Manila, Philippines.

18 Q. Manila?

19 A. Well, wait, it's the city -- I guess it's

20 Green Hills. It's a suburb of Manila.

21 Q. Green Hills?

22 A. Yes.

23 Q. Were you married prior to Mr. Santamaria?

24 A. No.

25 Q. Okay. Do you have any children?

1 A. Yes.

2 Q. How many?

3 A. Three.

4 Q. Can you tell me their names, please?

5 A. Chris.

6 Q. Chris Santamaria?

7 A. Christopher, Chris.

8 Q. Christopher. How old is he?

9 A. Born 1969. So that's 40 -- is that 43?

10 Q. And the next child?

11 A. Vincent.

12 Q. Santamaria?

13 A. Yes.

14 Q. And how old is he?

15 A. Thirty -- he was born 1973.

16 Q. 1973. So he's about 38, 39, depending on

17 what month.

18 A. September.

19 Q. Okay. And the third child?

20 A. Michelle.

21 Q. Santamaria?

22 A. Uh-huh.

23 Q. Yes?

24 A. Yes.

25 Q. And when was she born?

1 A. March '77.

2 Q. Okay. And what is Christopher Santamaria's

3 occupation?

4 A. Attorney.

5 Q. He's an attorney in the state of Florida?

6 A. Yes.

7 Q. Is he currently practicing?

8 A. Yes.

9 Q. Okay. You paused a little bit.

10 A. I'm thinking his practice in real estate law.

11 Q. Okay. Does he have his own firm practicing

12 real estate law?

13 A. Yes.

14 Q. And Vincent Santamaria, what does he do?

15 What is his occupation?

16 A. He's an IT person.

17 Q. Okay. And Michelle Santamaria?

18 A. Attorney.

19 Q. Attorney. Is she currently practicing law?

20 A. Yes.

21 Q. Okay. Does she have her own practice?

22 A. Yes.

23 Q. And these are your only three children?

24 A. Yes.

25 Q. What month was Christopher born?

1 A. June.

2 Q. And Michelle was born in what month?

3 A. March.

4 Q. Miss Santamaria, have you ever been arrested?

5 A. No.

6 Q. Have you ever received a traffic ticket?

7 A. Yes.

8 Q. Speeding ticket?

9 A. Yes.

10 Q. Tell me about it.

11 A. I was on Royal Palm Beach Boulevard, and he

12 said I was going past 30 miles.

13 Q. The police officer said that?

14 A. Yes.

15 Q. Is that your only speeding ticket?

16 A. Yes.

17 Q. Okay. When do you think that was?

18 A. Fifteen years ago.

19 Q. Fifteen years? Had a pretty good record

20 since then?

21 MR. BARSKY: Object to the form.

22 THE WITNESS: What?

23 MR. BARSKY: You can answer that.

24 THE WITNESS: Oh.

25

1 BY MS. KITTERMAN:

2 Q. Yes?

3 A. I said yes.

4 Q. Thank you.

5 Have you ever been involved in a lawsuit in
6 the United States?

7 A. No.

8 Q. Have you ever been involved in a lawsuit in
9 any other country?

10 A. No.

11 Q. Does Christopher have any children?

12 A. No.

13 Q. Okay. Does Vincent have any children?

14 A. Yes.

15 Q. How many?

16 A. Three.

17 Q. And what are their ages?

18 A. Six, three and 17 months.

19 Q. Seventeen months. Boys and girls?

20 A. Two girls, one boy.

21 Q. Which one is the boy?

22 A. The youngest.

23 Q. And Michelle, does Michelle have any
24 children?

25 A. No.

1 Q. Has Michelle ever been pregnant?

2 MR. BARSKY: Object to the form.

3 THE WITNESS: No.

4 BY MS. KITTERMAN:

5 Q. Has she ever been the victim of a crime?

6 MR. BARSKY: Object to the form.

7 MS. KITTERMAN: You can object to the form
8 and she can answer.

9 MR. BARSKY: If you know the answer to that.

10 THE WITNESS: What is the question again?

11 BY MS. KITTERMAN:

12 Q. Has she ever been the victim of a crime?

13 A. I wouldn't -- oh, no.

14 Q. Okay.

15 A. Oh, wait.

16 THE WITNESS: Victim of a crime like what?

17 MS. KITTERMAN: He can't help you.

18 MR. BARSKY: I can't answer that for you.

19 MS. KITTERMAN: If you know.

20 MR. BARSKY: That's part of the reason why I
21 objected.

22 BY MS. KITTERMAN:

23 Q. Do you know if she's ever been the victim of
24 a crime that she would have reported to the police?

25 A. Oh, like criminal, a crime like that?

1 Q. Yes, she was a victim. Not that she
2 committed a crime, but she was a victim of a crime.

3 MR. BARSKY: I'm going to renew my form
4 objection.

5 BY MS. KITTERMAN:

6 Q. You can answer.

7 A. No.

8 Q. Okay. Was your daughter involved in a sexual
9 assault or a sexual harassment lawsuit?

10 A. Yes.

11 MR. BARSKY: Object to the form.

12 BY MS. KITTERMAN:

13 Q. Do you know the facts surrounding that?

14 MR. BARSKY: You can answer that if you know.

15 BY MS. KITTERMAN:

16 Q. If you know.

17 A. Okay. Facts around it. Like I know her
18 professor, that's about it.

19 Q. Okay. What was the name of her professor?

20 A. Professor Smiley, something like that.

21 Q. Okay. Do you know what the outcome of that
22 was?

23 A. I'm going to guess if I say it.

24 MR. BARSKY: No, then --

25 THE WITNESS: I'm not sure.

1 BY MS. KITTERMAN:

2 Q. You don't have to guess if you don't know.

3 MR. BARSKY: If you don't know, you can say
4 it again.

5 BY MS. KITTERMAN:

6 Q. You don't know?

7 A. Yes, I don't know.

8 Q. Okay. Miss Santamaria, have you attended any
9 schooling?

10 A. Yes.

11 Q. What was your highest level of education?

12 A. College.

13 Q. Where did you go to college?

14 A. Philippines.

15 Q. Okay. And what were you in college for?

16 A. Bachelor of Arts.

17 Q. And did you achieve your Bachelor of Arts
18 degree?

19 A. Yes.

20 Q. Was it in any specific field or it's just a
21 general Bachelor of Arts degree?

22 A. General.

23 Q. Okay. I'm not sure how it works in the
24 Philippines, if it's the same.

25 A. Yes.

1 Q. And what was the name of that college that
2 you went to?

3 A. Assumption College.

4 Q. Assumption College. Did you attend any other
5 college?

6 A. No.

7 Q. Since you've been to the United States, have
8 you been to any college or any --

9 A. No.

10 Q. -- post graduate courses?

11 A. No.

12 Q. When did you come to the United States?

13 A. 1968.

14 Q. Do you recall the date exactly?

15 A. It would have to be July 1968. The exact
16 date, no.

17 Q. Okay. So you got married in July --

18 A. Yes.

19 Q. -- 10th, 1968?

20 Did you come here after you were married?

21 A. Europe first.

22 Q. Okay. So after you were married in the
23 Philippines, you took a honeymoon --

24 A. Yes.

25 Q. -- essentially? Okay. To Europe, and then

1 you moved to the United States?

2 A. Yes.

3 Q. When you originally came to the United States
4 in 1968, was that for the purpose of moving to the
5 United States --

6 A. No.

7 Q. -- permanently?

8 A. No.

9 Q. What was the purpose?

10 A. For my husband to go to get his master's.

11 Q. Okay. Where was he going to get his master's
12 degree?

13 A. Wharton School.

14 Q. Wharton School of Business?

15 A. Yes.

16 Q. And where did you guys live when he was going
17 to get his master's?

18 A. Campus.

19 Q. Lived on campus?

20 A. Yes.

21 Q. And did he finish and get his degree at
22 Wharton School of Business?

23 A. Yes.

24 Q. Do you know what year that was?

25 A. '70, 1970.

1 Q. And then after 1970, where did you guys move?

2 A. We still were in Philadelphia.

3 Q. Still in Philadelphia. When did you move to
4 Palm Beach?

5 A. '77.

6 Q. Have you lived here continuously? Have you
7 lived in Palm Beach continuously since 1977?

8 A. Yes.

9 Q. You haven't lived anywhere else?

10 A. No.

11 Q. Where do you currently live? What's your
12 current address?

13 A. 255 Ponderosa Court, Royal Palm Beach.

14 Q. What is the zip code?

15 A. 33411.

16 Q. Are you a citizen of the United States?

17 A. Yes.

18 Q. When did you become a citizen?

19 A. I think 1990.

20 Q. 1990. How did you become a citizen?

21 A. What do you mean?

22 Q. Did you apply to become a citizen?

23 A. Yes.

24 Q. Who did you apply through? Did you use an
25 attorney or did you do it on your own?

1 MR. BARSKY: Object to the form.

2 THE WITNESS: I think -- I don't know. I
3 don't remember.

4 BY MS. KITTERMAN:

5 Q. Okay. Did you personally apply or did you
6 have your -- was your husband applying for himself and
7 you?

8 A. My husband.

9 Q. Do you recall signing any immigration forms
10 to become a citizen?

11 A. Yes.

12 Q. You do recall? Do you have copies of those?

13 A. The citizenship paper, yes.

14 Q. Okay. And I assume Christopher, since he was
15 born in June of 1969, he was born in the U.S.?

16 A. Yes.

17 Q. What was your husband's name at birth?

18 A. Jesus Santamaria.

19 Q. Did he have a middle name?

20 A. Ros.

21 Q. R-o --

22 A. S.

23 Q. S. When you married him, what was he going
24 by, what was his name?

25 A. Jess.

1 Q. Jess?

2 A. J-e-s-s.

3 Q. Uh-huh. Any middle name?

4 A. Ros.

5 Q. Santamaria?

6 A. Yes.

7 Q. Do you know your husband's current legal
8 name?

9 A. Jess Ros Santamaria.

10 Q. Do you know when he changed his legal name to
11 be Jess Ros Santamaria?

12 A. When we became citizens.

13 Q. When you became citizens in approximately
14 1990?

15 A. (The witness nods.)

16 MR. BARSKY: You have to --

17 THE WITNESS: Oh, I have to say it?

18 MR. BARSKY: Uh-huh.

19 THE WITNESS: Yes.

20 MS. KITTERMAN: I forget, too, sometimes
21 because I can see you nod. And we can all see you
22 nod, but she can't write that down.

23 THE WITNESS: Sorry.

24 MS. KITTERMAN: It's okay.

25

1 BY MS. KITTERMAN:

2 Q. Do you know whether your daughter knows your
3 husband's legal name?

4 A. I would suppose so.

5 Q. Would it surprise you if she testified she
6 did not know his legal name?

7 A. She's only known him as Jess, so -- or dad.

8 Q. Okay. Dad?

9 A. Yeah.

10 Q. That would make sense. Okay. Do you know
11 who Jesus Vincent Santamaria is?

12 A. That's Jess.

13 Q. That's your husband?

14 A. Yes.

15 Q. When was he known as Vincent Santamaria --
16 Jess Vincent -- I'm sorry, Jesus Vincent Santamaria?

17 A. I guess that's his birth name, too.

18 Q. Okay. And you already stated that Jesus Ros
19 Santamaria was his birth name; correct?

20 A. Yes.

21 Q. Do you know Jesus Vincent Ros Santamaria?

22 A. The same person, Jess.

23 Q. Okay. So was that his birth name as well, or
24 do you know where that came from?

25 A. I guess that would be his birth name.

1 Q. Okay. Is there any other names that he has
2 been known as that you know of?

3 A. No. No.

4 Q. Okay. Have you ever been required to sign
5 his name to any legal documents in this country?

6 A. No.

7 Q. Has your husband ever been married prior to
8 you?

9 A. No.

10 Q. Does your husband have any other children
11 from any other relationships?

12 A. No.

13 Q. Do you know whether your husband has ever
14 been arrested?

15 A. No, he has never been arrested.

16 Q. Do you know whether your husband has ever
17 received a traffic ticket?

18 A. Yes.

19 Q. Yes, you know?

20 A. (The witness nods.)

21 Q. He has?

22 A. Oh, yes.

23 Q. Do you know when he received the traffic
24 ticket?

25 A. No.

1 Q. Do you know what the circumstances were
2 surrounding the traffic ticket?

3 A. I guess going over the speed limit.

4 Q. Going over the speed limit. Would you say
5 that was in the past year?

6 A. More than that.

7 Q. Three years?

8 A. Maybe.

9 Q. Five years?

10 THE WITNESS: It should be yes or no only?

11 MR. BARSKY: If you know the answer to the
12 question, you can answer it, but...

13 THE WITNESS: I don't know. It's...

14 BY MS. KITTERMAN:

15 Q. Okay. That's fair enough. I'm not asking
16 you to guess. I'm just trying to see if I can hone in
17 on exactly when it was.

18 A. Yeah.

19 MR. BARSKY: It's a public record.

20 THE WITNESS: I'm sorry?

21 MS. KITTERMAN: Well, I understand that, but
22 this is also her deposition so I can ask her what
23 she knows. Thank you.

24 BY MS. KITTERMAN:

25 Q. Okay. Has your husband ever been diagnosed

1 with any physical or mental disabilities within the past
2 ten years?

3 A. Mental, no.

4 Q. What are the physicals?

5 A. Physical, heart.

6 Q. His heart?

7 A. (The witness nods.)

8 Q. What is wrong with his heart?

9 A. He has mitral valve prolapse.

10 Q. And when was he diagnosed with that?

11 MR. BARSKY: Object to the form.

12 Is there a reason, just out of curiosity,
13 that we're going through Jess's medical history?

14 MS. KITTERMAN: Because I'm asking questions.
15 So you can object to the form, your objections will
16 be noted on the record and she can answer the
17 question.

18 MR. BARSKY: No, but I'm saying --

19 MS. KITTERMAN: I would appreciate it if you
20 don't stop in the middle of my deposition.

21 MR. BARSKY: I can cut the deposition off.
22 There's a reason why we're asking about someone's
23 private medical records --

24 MS. KITTERMAN: Yes.

25 MR. BARSKY: -- which aren't at issue in this

1 case?

2 MS. KITTERMAN: I am entitled to discover
3 whatever I need to during a deposition.

4 MR. BARSKY: No. You can do so --

5 MS. KITTERMAN: Yes, I am.

6 MR. BARSKY: There's a limit.

7 MS. KITTERMAN: So you can state your
8 objection for the record. And if you want to bring
9 it up in front of the court, you're entitled to do
10 that.

11 MR. BARSKY: I'm going to object on the
12 record. If you've got somewhere you're going with
13 this; otherwise, I can stop it. So let's just --

14 MS. KITTERMAN: You can stop it. And if you
15 do, you'll be sanctioned, so --

16 MR. BARSKY: No.

17 BY MS. KITTERMAN:

18 Q. You can answer the question.

19 A. I don't know when he was diagnosed.

20 Q. Okay. Has he ever been diagnosed with
21 dementia?

22 A. No.

23 Q. Alzheimer's?

24 A. No.

25 Q. Do you know whether your husband has ever had

1 ownership in a bank?

2 A. Yes.

3 Q. What bank?

4 A. I don't know the name.

5 Q. Was that in Palm Beach County?

6 A. Yes.

7 Q. Do you know when that was?

8 A. In the '90s.

9 Q. Okay. Does he still have ownership?

10 A. That bank, it never went through. They were

11 just forming it.

12 Q. Oh, they are forming it, never completed.

13 Okay.

14 All right. When did your husband run for

15 county commissioner?

16 A. 2006.

17 Q. Okay. Did you support his decision to run

18 for political office?

19 A. No.

20 Q. Why not?

21 A. I don't like politics.

22 Q. I don't blame you.

23 Do you know whether anybody else in your

24 family supported him in his run for County Commission?

25 A. No.

1 Q. You don't know or they did not support him?

2 A. They did not support him -- or they didn't
3 like him to run, let's put it that way. But once he
4 decided, then we supported him.

5 Q. Of course.

6 Has his position as a County Commission
7 affected your family in a positive way?

8 MR. BARSKY: Object to the form.

9 BY MS. KITTERMAN:

10 Q. You can answer.

11 MR. BARSKY: You can answer.

12 THE WITNESS: Say it again?

13 BY MS. KITTERMAN:

14 Q. Has his position as a county commissioner had
15 any effect on your family in a positive manner?

16 MR. BARSKY: Same objection.

17 BY MS. KITTERMAN:

18 Q. You can answer.

19 A. I would say no.

20 Q. Has it had any effect on your family in a
21 negative manner?

22 MR. BARSKY: Object to the form.

23 THE WITNESS: Yes.

24 BY MS. KITTERMAN:

25 Q. Why?

1 A. Because he has less time with us.

2 Q. Anything else?

3 A. No.

4 Q. Have you or your husband ever received any
5 gifts from people that work for the Palm Beach County
6 Commission?

7 A. No.

8 Q. Are you -- let me start with: Are you
9 familiar with the request for inquiry that Mr. Schaller
10 submitted with regard to your husband?

11 A. I know there's a lot of pages.

12 Q. Okay. I'm going to show it to you and you
13 can tell me if -- I'm not going to mark it as an exhibit
14 right now. Tell me if you recognize it. I just printed
15 one copy since there's a lot of pages.

16 A. What am I supposed to do, read it?

17 Q. No, you can just flip through it and tell me
18 if that is what you saw, if that looks familiar to you.

19 A. Okay.

20 Q. Okay. So you've seen it before?

21 A. I'm sorry?

22 Q. Have you seen that before?

23 A. I saw a whole thick one, but I didn't read
24 it.

25 Q. Read. Okay. Fair enough.

1 Are you familiar with your husband going
2 through several different investigations as a result of
3 this request for inquiry?

4 A. Yes.

5 Q. Okay. Do you know what those investigations
6 were?

7 A. No.

8 Q. Were you familiar with the inspection by the
9 Inspector General at the County?

10 A. Yes.

11 MR. BARSKY: Object to the form.

12 BY MS. KITTERMAN:

13 Q. Did you have an opportunity to see the
14 Inspector General's report?

15 A. No.

16 Q. Are you familiar that Mr. Santamaria went
17 through an investigation by the Florida Elections
18 Commission?

19 A. That's local, elections commission is local?

20 Q. No, that's in Tallahassee.

21 A. Yes.

22 Q. No?

23 (Discussion held off the record.)

24 BY MS. KITTERMAN:

25 Q. So, yes, you are. Sorry.

1 A. If you say the one in Tallahassee?

2 Q. Yes.

3 A. Yes.

4 Q. Okay. Did you have an opportunity to see
5 what the result from that investigation was?

6 A. To see, no.

7 Q. Do you know what the result was?

8 A. Yes.

9 Q. What?

10 A. That he wasn't found to have violated
11 anything.

12 Q. Okay. Are you familiar with a investigation
13 that happened in 2006 related to your husband's position
14 as a county commissioner?

15 A. What investigation is that?

16 Q. Through the Florida Elections Commission.

17 A. (Witness shaking head.)

18 (Discussion held off the record.)

19 THE WITNESS: No.

20 BY MS. KITTERMAN:

21 Q. Okay. Just so I'm clear because I think that
22 I confused myself and the record, you are familiar with
23 the 2011 investigation in Tallahassee from the
24 Florida Ethics?

25 MR. BARSKY: Object to the form.

1 BY MS. KITTERMAN:

2 Q. Are you familiar?

3 MR. BARSKY: Same objection.

4 THE WITNESS: Yes.

5 BY MS. KITTERMAN:

6 Q. Yes. Okay. What do you know about that
7 investigation?

8 A. Oh, okay. So I just know I was there.

9 Q. You were in Tallahassee with your husband?

10 A. Yes.

11 Q. Did you testify in that proceeding?

12 A. No.

13 Q. Were you a witness to that proceeding?

14 A. No.

15 MR. BARSKY: Object to the form.

16 BY MS. KITTERMAN:

17 Q. Do you know what the outcome of that
18 proceeding was?

19 A. Yes.

20 Q. What?

21 A. He was not found to have violated anything.

22 Q. Okay. Do you know what the violations he was
23 being accused of at that particular hearing in
24 Tallahassee?

25 MR. BARSKY: Object to the form.

1 THE WITNESS: No.

2 BY MS. KITTERMAN:

3 Q. No?

4 A. I wouldn't remember if it was told to me.

5 Q. That's okay. All you can tell me is what you
6 know or what you remember.

7 Are you familiar that whether or not your
8 husband was -- one of the issues that was investigated
9 as to whether or not he had synced his pocket calendars
10 with his County Commission calendar?

11 MR. BARSKY: Object to the form.

12 BY MS. KITTERMAN:

13 Q. You can answer. He's just going to object
14 for the record, and you can answer.

15 A. Yes.

16 Q. Okay. What do you know about that claim?

17 A. That his calendar wasn't synced with the
18 County calendar.

19 Q. Okay. Do you know whether your husband has
20 any pocket calendars from any year other than 2011?

21 A. Yes.

22 Q. What years?

23 A. Every year.

24 Q. So he keeps them every year basically?

25 A. (The witness nods.)

1 Q. Do you know what he puts in the pocket
2 calendars, what type of appointments?
3 A. All appointments.
4 Q. Everything?
5 A. Family, reminders.
6 Q. Business?
7 A. Personal.
8 Q. Personal?
9 A. (The witness nods.)
10 Q. Any business?
11 A. Business, yes.
12 Q. Do you know whether your husband has ever
13 written any letters that have anybody else's name, he
14 signed anybody else's name to it?
15 A. No.
16 Q. Do you know whether your husband made any
17 petitions for reelection during county forums?
18 A. Say it again? I don't understand.
19 Q. Did he ask or make any petitions for his
20 reelection during a county forum?
21 A. Yes.
22 Q. Do you know when?
23 A. No.
24 Q. Okay. Was it within the past election?
25 A. Yes.

1 Q. So maybe in 2011?

2 MR. BARSKY: Object to the form.

3 THE WITNESS: No.

4 BY MS. KITTERMAN:

5 Q. When?

6 A. 2010.

7 Q. 2010? Okay. Did you or any of your family

8 members make any petitions for him to be reelected

9 during a county forum?

10 MR. BARSKY: Object to the form.

11 Are you referring to a written petition?

12 MS. KITTERMAN: No, just a petition asking

13 people to vote for him.

14 MR. BARSKY: Same objection.

15 You can answer.

16 THE WITNESS: What was the question again?

17 BY MS. KITTERMAN:

18 Q. Did you or any of your family members --

19 A. Me.

20 Q. You did?

21 A. Uh-huh.

22 Q. Thank you. Do you know when that was? Was

23 that in --

24 A. 2010.

25 Q. Are you currently employed?

1 A. Yes.

2 Q. Where?

3 A. The Royal Inn.

4 Q. Royal Inn? And what is your position at the

5 Royal Inn?

6 A. I guess I give myself title, administrative

7 assistant.

8 Q. Whose administrative assistant are you?

9 A. For everybody.

10 Q. For everybody?

11 A. (The witness nods.)

12 Q. For the managers?

13 A. I guess you can say office manager.

14 Q. What are your job duties?

15 A. I oversee the girls.

16 Q. What girls?

17 A. The bookkeepers.

18 Q. Okay.

19 A. They need any supplies, I go out and get it.

20 Q. Okay. What else?

21 A. That's it.

22 Q. You just oversee the girls?

23 A. Yes.

24 Q. Do you do scheduling?

25 A. No.

1 Q. Do you handle any employee complaints?

2 A. No.

3 Q. Do you do anything with regarding any human
4 resources?

5 A. No.

6 Q. Do you do the hiring?

7 A. No.

8 Q. Do you do the firing?

9 A. I guess if they have to be fired.

10 Q. Okay. Have you fired anybody?

11 A. No.

12 Q. Would you be the person to fire somebody that
13 is not within the office that's not a bookkeeper?

14 A. No.

15 Q. Okay. Who -- is there a general manager at
16 the Royal Inn?

17 A. No.

18 Q. So who runs the Royal Inn, basically?

19 MR. BARSKY: Object to the form.

20 You can answer.

21 THE WITNESS: I'm trying to think.

22 BY MS. KITTERMAN:

23 Q. Who is in charge of the day-to-day
24 operations?

25 A. For the front desk, it would be the front

1 desk supervisor.

2 Q. Do you know who that is?

3 A. Rhonda Davis.

4 Q. Okay. Who is in control or who supervises
5 the housekeeping staff -- well, first, do you have a
6 housekeeping staff?

7 A. Yes.

8 Q. Who is the supervisor for the housekeeping
9 staff?

10 A. Pat Ford.

11 Q. Pat Ford?

12 A. Pat Ford.

13 Q. Is that a man or a woman?

14 A. Woman.

15 Q. Okay. And how long has Pat Ford been with
16 Royal Inn?

17 A. Sixteen years, 17 years.

18 Q. Seventeen years. And, I'm sorry, how about
19 Rhonda Davis?

20 A. Five years.

21 Q. Is there a restaurant within your
22 establishment?

23 A. There is one that is leasing the space from
24 us.

25 Q. Okay. So it's not within your control?

1 A. No.

2 Q. What is the name of that restaurant?

3 A. El Toro.

4 Q. El Toro?

5 A. (The witness nods.)

6 Q. Okay. How long has El Toro been leasing

7 space there?

8 A. I don't know.

9 Q. A long time?

10 A. Maybe seven years.

11 Q. Seven. Okay. Prior to working at the

12 Royal Inn, did you work anywhere else before the

13 Royal Inn?

14 A. Yes.

15 Q. Where did you work?

16 A. In Philadelphia.

17 Q. In Philadelphia? What did you do in

18 Philadelphia?

19 A. I worked for Pan Am.

20 Q. What did you do for Pan Am?

21 A. Reservations.

22 Q. And how long did you work there?

23 A. Nine years.

24 Q. Nine years? Did you have any other jobs in

25 Philadelphia?

1 A. No.

2 Q. Okay. Do you know approximately how many
3 employees the Royal Inn has?

4 A. No. Sorry.

5 Q. It's okay. Do you think they have a hundred?

6 A. No.

7 Q. Less?

8 A. Much less.

9 Q. Okay. Twenty?

10 A. Around there.

11 Q. Okay. How many rooms does it have?

12 A. 161.

13 Q. Has your husband ever required the Royal Inn
14 employees to stand when you walk into a room?

15 A. No.

16 Q. No?

17 I think it would make me feel good.

18 A. To have them stand?

19 Q. To having people stand when I walk in the
20 room. I'm just kidding.

21 Do you own any property in Palm Beach County?

22 A. Yes.

23 Q. Where?

24 MR. BARSKY: Object to the form.

25 THE WITNESS: 255 --

1 A. Yes.

2 Q. Do you know what those are?

3 A. Rental units.

4 Q. Rental units? What do you mean?

5 A. Townhouses we rent out, so rental units.

6 Q. And where are those located?

7 A. Royal Palm Beach.

8 Q. Do you own or does he own, I apologize,
9 the -- like a whole subdivision, or individual units?

10 A. Individual units.

11 Q. Okay. How many?

12 A. Maybe three.

13 Q. Maybe three? Does your husband own any
14 commercial property in Palm Beach County?

15 THE WITNESS: Can I ask you a question?

16 MS. KITTERMAN: Well, you're not supposed to
17 during a deposition.

18 MR. BARSKY: Yeah, I can't. If you don't
19 know the answer, then --

20 THE WITNESS: No, because she's saying your
21 husband. So it has to mean his individual name?

22 MR. BARSKY: That's the question she's asked.

23 THE WITNESS: No.

24 BY MS. KITTERMAN:

25 Q. Okay. Do any of your husband's companies own

1 property in Palm Beach County?

2 A. Yes.

3 Q. Do you know what those are?

4 A. Can I have a clarification?

5 Q. Sure.

6 A. When you say his companies, you mean he owns
7 a hundred percent?

8 Q. No, any ownership.

9 A. Like it could be 10 percent?

10 Q. Correct.

11 A. Okay.

12 MR. BARSKY: I'm going to object to the form
13 since that would include if he owns one share of
14 stock in GE. Technically, it would be property
15 that GE owns.

16 MS. KITTERMAN: Okay. Sure. I'll clarify
17 that.

18 BY MS. KITTERMAN:

19 Q. Not including any publicly traded company
20 that he would own 1 percent or anything that is traded
21 on the stock market, I'm not talking about that. I'm
22 talking about any privately held companies that your
23 husband would be an owner of that owns property in Palm
24 Beach County.

25 A. Okay.

1 Q. Okay. He does?

2 A. Yes.

3 Q. Okay. Do you know what those are?

4 A. Royal Plaza.

5 Q. And where is that located?

6 A. Royal Palm Beach.

7 Q. What else?

8 A. Royal Inn.

9 Q. And that's the hotel that you're working at?

10 A. Yes.

11 Q. All right. Does he own the actual real

12 estate as well as the building?

13 A. Yes.

14 Q. And what else?

15 A. The Royal Commerce Park.

16 Q. And where is that located?

17 A. Royal Palm Beach.

18 Q. And what else?

19 A. Royal Plaza North.

20 Q. Is that in Royal Palm Beach as well?

21 A. Yes.

22 Q. What else?

23 A. Willows Plaza.

24 Q. Willows?

25 A. Yes.

1 Q. Thank you. And where is that located?

2 A. Royal Palm Beach.

3 Q. Where else?

4 A. Wellington Mall.

5 Q. And where is that located?

6 A. Wellington.

7 Q. And where else?

8 A. And I think that's it.

9 Q. You think that's it? Okay. For the

10 Wellington Mall, does he own the real estate as well as

11 the structure?

12 A. Yes.

13 Q. Okay. And Willows Plaza, does he own the

14 real estate as well as the structure?

15 A. (The witness nods.)

16 Q. Yes?

17 A. Yes.

18 Q. Royal Plaza North, does he own the real

19 estate --

20 A. Yes.

21 MR. BARSKY: Let me just -- when you're

22 referring to him, you mean his companies?

23 MS. KITTERMAN: Yes. Right.

24 MR. BARSKY: I just wanted to make sure.

25 MS. KITTERMAN: Yes.

1 BY MS. KITTERMAN:

2 Q. Okay. Royal Commerce Park?

3 A. Yes.

4 Q. He owns the real estate as well as the
5 structures? And, yes, I'm referring to --

6 A. Yes.

7 Q. And the Royal Plaza, does he own the real
8 estate as well as the structures?

9 A. Yes.

10 Q. To the best of your knowledge, are those the
11 only properties that your husband or any of his
12 companies own?

13 A. Yes, to the best of my knowledge.

14 Q. Okay. Do you know whether your husband owns
15 any property outside of Royal Palm Beach anywhere else
16 in the country?

17 A. Yes.

18 MR. BARSKY: Object to the form. Do you mean
19 his companies again?

20 MS. KITTERMAN: Yes.

21 THE WITNESS: His companies? No.

22 BY MS. KITTERMAN:

23 Q. Whether your husband, individually, or any of
24 his companies own any property outside of Palm Beach in
25 the country?

1 A. Yes.

2 Q. Where?

3 A. I don't know where Marion Oaks is.

4 Q. Marion Oaks? Okay. Is it in Florida?

5 A. Florida.

6 Q. Okay. Is that a development? What is that?

7 A. It's a vacant piece of land.

8 Q. Oh, okay. Anything else --

9 A. That's it.

10 Q. -- that you know of?

11 Okay. Do you know if your husband or any of

12 his companies own any property outside of the U.S.?

13 A. No.

14 Q. Do you and your husband own any property

15 outside of the U.S.

16 A. No.

17 Q. Okay. Do you or your husband have any bank

18 accounts in any country other than the U.S.?

19 A. No.

20 Q. Do you own a gun?

21 A. No.

22 Q. Does your husband?

23 A. Yes.

24 Q. Does he have a concealed weapons permit?

25 A. I don't know.

1 Q. Do you have security cameras at any of your
2 properties --

3 A. Yes.

4 Q. -- in Palm Beach County?

5 A. Yes.

6 Q. Where?

7 A. The Wellington Mall, the Royal Inn. I think
8 the Royal Plaza. That's about it.

9 Q. Okay. Any at your house?

10 A. Yes.

11 Q. But not at Willows Plaza or Royal Commerce
12 Park?

13 A. That's right.

14 Q. Do you know whether any law enforcement has
15 ever requested surveillance videos from any of your
16 properties?

17 MR. BARSKY: Object to the form. You're
18 saying your. You mean --

19 BY MS. KITTERMAN:

20 Q. Yes. When I say your, I'm talking about the
21 properties that we've gone over, whether they're related
22 to you, your husband, or his entities, the ones that
23 you've testified about today.

24 A. Yes.

25 Q. Okay. What were the circumstances

1 surrounding that?

2 A. It was after 911.

3 Q. Uh-huh.

4 A. Somebody had called him that he overheard
5 some conversation, and so they looked at the cameras of
6 the gym.

7 Q. Of the gym?

8 A. The Royal Plaza, there was a gym before
9 there.

10 Q. Oh, okay. Who overheard a conversation?

11 MR. BARSKY: Object to the form.

12 THE WITNESS: I don't know his name.

13 BY MS. KITTERMAN:

14 Q. Okay. Do you know whatever happened with
15 that investigation?

16 A. They -- I don't think anything ever happened.
17 The FBI came, but that was it.

18 Q. Okay. Do you know whether anybody has ever
19 been arrested at any of the properties that we've
20 discussed here today?

21 A. Hearsay. I wouldn't know personally.

22 Q. You have no personal knowledge?

23 A. I have no personal knowledge.

24 Q. What are your -- what have you heard? Have
25 you heard of any?

1 A. Yes.

2 Q. What have you heard of?

3 A. Somebody had drugs.

4 Q. Somebody had drugs?

5 A. In the room, yes.

6 Q. Where?

7 A. In the hotel.

8 Q. In the hotel? When was that?

9 A. I don't know.

10 Q. You don't know? Was it recently?

11 A. I guess --

12 MR. BARSKY: Object to the form.

13 THE WITNESS: I guess within the past year.

14 BY MS. KITTERMAN:

15 Q. Oh, within the past year?

16 A. Yes.

17 Q. Okay. Do you know whatever happened with

18 that investigation?

19 A. No.

20 Q. Do you know whether there's been any death at

21 any of your properties?

22 A. Yes.

23 Q. Tell me about that.

24 A. I was just told that somebody committed

25 suicide.

1 Q. Really?

2 A. (The witness nods.)

3 Q. When was that?

4 A. I don't remember.

5 Q. Which property?

6 A. The hotel.

7 Q. In the hotel?

8 A. (The witness nods.)

9 Q. Do you know what those circumstances were
10 surrounding the suicide?

11 A. No, other than his wife was divorcing him, he
12 lost his job. That was in his letter. That's what I
13 was told.

14 Q. Was this a hotel guest or someone who worked
15 for you?

16 A. Hotel guest.

17 Q. Okay. And was he found in one of the rooms?

18 A. Yes.

19 Q. Do you know how he committed suicide, how he
20 killed himself?

21 A. No.

22 Q. Has anybody ever been injured at one of your
23 properties that you know of?

24 A. I can't say I do.

25 Q. Do you know whether anybody's ever drowned at

1 one of your properties, at a pool?

2 A. Yes.

3 Q. Tell me about that.

4 A. I was told a little girl drowned in the pool.

5 Q. Do you know when that was?

6 A. Twenty years ago.

7 Q. Twenty years ago?

8 A. It was a long time.

9 Q. Was the girl a guest or an employee?

10 MR. BARSKY: Object to the form.

11 BY MS. KITTERMAN:

12 Q. You can answer.

13 A. I think she was a guest.

14 Q. You think she was a guest. Do you know how

15 old she was?

16 A. Seven, eight.

17 Q. Any others?

18 A. Not that I know.

19 Q. Not that you know of?

20 A. No.

21 Q. Do you know whether you or any of your

22 husband's companies have hired any illegal immigrants to

23 work at the properties?

24 MR. BARSKY: Object to the form.

25 THE WITNESS: No.

1 BY MS. KITTERMAN:

2 Q. No, you don't know?

3 A. He can't.

4 Q. He has not?

5 A. He has not.

6 Q. Do you know who Vivian Ferrin is?

7 A. Yes.

8 Q. Who is that?

9 A. A friend of ours.

10 Q. A friend?

11 A. Yes. V-i-v-i-a-n, F-e-r-r-i-n.

12 Q. And where do you know Vivian from?

13 A. From Philadelphia first.

14 Q. Okay. How did you meet her in Philadelphia?

15 A. It's a guy.

16 Q. Oh, it's a guy. I apologize.

17 A. His wife and I worked at Pan Am.

18 Q. Okay. Do they still live in Philadelphia?

19 A. No, he's dead.

20 Q. I'm sorry? Oh, he's dead?

21 A. Vivian is dead.

22 Q. Okay. What was Vivian's occupation in
23 Philadelphia?

24 A. He was the head --

25 MR. BARSKY: Object to the form.

1 BY MS. KITTERMAN:

2 Q. You can answer.

3 A. He was the head of the passport office, U.S.

4 Q. Do you currently have a housekeeper at your
5 place?

6 A. No.

7 Q. Have you ever had a housekeeper who got
8 married to get their U.S. citizenship?

9 A. No.

10 Q. Do you or your family members have any
11 ownership in a sugar business?

12 A. Yes.

13 MR. BARSKY: Object to the form.

14 BY MS. KITTERMAN:

15 Q. What is that interest?

16 MR. BARSKY: Object to the form.

17 THE WITNESS: What do you mean?

18 BY MS. KITTERMAN:

19 Q. What interest does your family have in the
20 sugar business?

21 MR. BARSKY: Same objection.

22 THE WITNESS: When my father, when he was
23 alive, was a sugar planter.

24 BY MS. KITTERMAN:

25 Q. Was that in the Philippines?

1 A. Philippines.

2 Q. Is that still within your family? Since you
3 said your father is no longer alive --

4 A. Yes.

5 Q. -- is the property still --

6 A. Yes.

7 Q. -- within your family?

8 A. Yes.

9 Q. Do you know whether there has ever been any
10 lawsuits regarding that sugar business property?

11 MR. BARSKY: Object to the form.

12 THE WITNESS: I don't know.

13 BY MS. KITTERMAN:

14 Q. Who is Emilio Jison?

15 MR. BARSKY: Object to the form.

16 THE WITNESS: My father.

17 BY MS. KITTERMAN:

18 Q. When did your father pass?

19 A. 1979.

20 Q. Did he always remain in the Philippines?

21 MR. BARSKY: Object to the form.

22 THE WITNESS: Yes.

23 BY MS. KITTERMAN:

24 Q. Do you know who Rose Marie Santamaria is?

25 A. No.

1 Q. Have you ever been contacted by a Rose Marie
2 Santamaria?

3 A. I've met -- how do you spell the last name?

4 Q. I believe it's the same way as yours.

5 A. Then no.

6 MR. BARSKY: Object to the form.

7 BY MS. KITTERMAN:

8 Q. Have you met somebody that had a similar
9 spelling?

10 A. A Rose.

11 MR. BARSKY: Object to the form.

12 BY MS. KITTERMAN:

13 Q. A Rose?

14 A. And then Santa Maria spelled differently.

15 Q. Okay. Who is that person, do you know?

16 A. We met her. Her son had a restaurant in
17 Boca.

18 Q. Uh-huh.

19 A. And that's how we met her.

20 Q. What was that restaurant?

21 A. I think it was called Bong's, B-o-n-g,
22 apostrophe S. The restaurant no longer exists.

23 Q. No? When was that? Do you know
24 approximately?

25 A. Ten years ago.

1 Q. Ten years ago? Okay. Do you know whether
2 your husband ever gave money to Rose Santamaria?

3 A. No.

4 Q. No, he never did or, no, you don't know?

5 A. He never did.

6 Q. Do you know a Raymond Kahn?

7 A. Yes.

8 Q. Who is that?

9 A. A nephew of Jess. K-a-h-n.

10 Q. How is it his nephew? Was it his sister's
11 son?

12 A. His sister's son.

13 Q. Do you know or do you have any relationship
14 with Dolly Santamaria Kahn?

15 A. That's the sister of Jess.

16 Q. Do you know a Francisco Santamaria?

17 A. Yes.

18 Q. Who is that?

19 A. Nephew of Jess.

20 Q. Is that the same sister's son?

21 A. No.

22 Q. Oh. Who is it?

23 A. The son of his brother.

24 Q. The son of his brother?

25 Do you know a Ninoy Aquino?

1 A. He was -- no, he wasn't president. Somebody
2 from the Philippines who was against Marcos. But it
3 wasn't -- there's a Y at the name, N-i-n-o-y.

4 Q. Right. When you say he was against Marcos,
5 what do you mean?

6 A. He was in prison during martial law.

7 Q. Am I saying it right? Ninoy?

8 A. Ninoy.

9 Q. Ninoy, N-i-n-o-y, and A-q-u-i-n-o.

10 Okay. So he was in prison during martial
11 law?

12 A. Yes.

13 MR. BARSKY: The same Marcos as the infamous
14 general.

15 THE WITNESS: Marcos is the president.

16 MR. BARSKY: President, whatever he is
17 called.

18 BY MS. KITTERMAN:

19 Q. He's the president of the Philippines?

20 A. Marcos was.

21 Q. Ferdinand?

22 A. Ferdinand Marcos.

23 Q. Do you know when that was?

24 A. When he was in prison? That would have had
25 to have been in the '70s.

1 Q. Now, did you have a personal relationship --
2 and I don't mean -- let me restate that.

3 Did you personally know Ninoy?

4 A. No.

5 Q. So you know about him being in prison through
6 the media?

7 A. Yes.

8 Q. Okay. Did you personally know
9 Ferdinand Marcos?

10 A. No.

11 Q. Had you ever met Ferdinand Marcos?

12 A. Yes.

13 Q. How many times?

14 A. Once.

15 Q. Once? Okay. Do you know Imelda Marcos?

16 A. Not personally, no.

17 Q. Who is that?

18 A. The wife of Ferdinand Marcos.

19 Q. Do you know whether your husband ever worked
20 for Ferdinand Marcos?

21 A. No, he never worked for him.

22 Q. No, he never worked for him?

23 A. No.

24 Q. Do you know whether he, your husband, has
25 picked anybody up from an airport for Ferdinand Marcos?

1 MR. BARSKY: Object to the form.

2 THE WITNESS: No.

3 BY MS. KITTERMAN:

4 Q. No, you don't know or, no, he has not?

5 MR. BARSKY: Object to the form.

6 You can answer.

7 THE WITNESS: I don't -- I don't know the
8 answer and I don't think he would have picked up
9 anybody.

10 BY MS. KITTERMAN:

11 Q. Okay. Do you know whether your husband has
12 ever been paid by any member of the Marcos regime?

13 MR. BARSKY: Object to the form.

14 THE WITNESS: No.

15 BY MS. KITTERMAN:

16 Q. No, he has not or no --

17 A. He has never been paid. He doesn't know
18 them.

19 Q. Have you ever been paid by anybody in the
20 Marcos regime?

21 MR. BARSKY: Object to the form.

22 THE WITNESS: No.

23 BY MS. KITTERMAN:

24 Q. Are you familiar with the lawsuit that's been
25 filed in this case by your husband against Mr. Schaller?

1 A. Yes.

2 Q. Okay. Have you had an opportunity to see the
3 actual complaint that's been filed?

4 A. No.

5 Q. What is your understanding of what the
6 lawsuit is about?

7 A. Defamation of character.

8 Q. Okay. What does that mean to you?

9 A. He told lies about Jess.

10 Q. He told lies about Jess?

11 A. Accused him of a crime he didn't commit.

12 Q. Okay. What did he accuse him of?

13 A. I don't know. Just a felony that Jess had
14 committed a crime, burglary or something like that.

15 Q. Okay. Have you ever had a chance to see what
16 the document was that stated that there was a felony
17 record?

18 A. Just what was in here.

19 Q. What was in the request for inquiry, that's
20 it?

21 A. Is that the same thing as what he passed --
22 he passed around to the media? Is that the same, the
23 request for inquiry?

24 Q. The request for inquiry is what is right in
25 front of you.

1 A. Okay. Then yes, that's it.

2 Q. If you turn to Page 76.

3 A. Okay.

4 Q. Is that the felony record that you're

5 speaking of?

6 A. Yes.

7 Q. Okay. And just for the record, can you read

8 to me what it says at the top?

9 A. Felony record for Jesus R. Santamaria.

10 Q. Okay. And then underneath it, it says what?

11 A. That Santamaria had a felony record.

12 Q. And then looking at the actual copy of the

13 judgment that is on this page, can you glance at it and

14 tell me if there is any personal identification

15 information on here that identifies that this is not

16 your husband?

17 MR. BARSKY: Object to the form.

18 THE WITNESS: The name.

19 BY MS. KITTERMAN:

20 Q. Why the name?

21 A. Because it says Jesus R. Santamaria and the

22 date is 1990 -- '91, and he wasn't Jesus R. Santamaria

23 in '91.

24 Q. Okay. Anything else?

25 A. No, that's it.

1 Q. And in 1991, he was -- what was his name?

2 A. Jess Ros Santamaria.

3 Q. Do you know when exactly he changed his name
4 to Jess Ros Santamaria?

5 MR. BARSKY: Object to the form.

6 THE WITNESS: When we became citizens.

7 BY MS. KITTERMAN:

8 Q. Okay. So was that in 1990?

9 A. (The witness nods.)

10 Q. Yes?

11 A. Yes.

12 (A brief recess was taken.)

13 BY MS. KITTERMAN:

14 Q. Have you ever seen your husband's petition
15 for naturalization when he became a citizen?

16 A. That would be the application form, or the
17 paper itself?

18 Q. I'll show it to you. I'm going to show
19 you -- I'll give it to your attorney first.

20 MR. BARSKY: Thanks.

21 THE WITNESS: I don't think I've seen this.

22 BY MS. KITTERMAN:

23 Q. You don't think you've seen that?

24 A. No.

25 Q. On that paper, it states what his name is.

1 Can you read that to me?

2 A. Jesus Vicente Santamaria.

3 Q. Okay. And do you know what the date of that
4 certificate is? I believe it's on the bottom.

5 A. January 1990.

6 Q. Okay.

7 (Plaintiff's Exhibits 1 and 2 were marked for
8 identification.)

9 BY MS. KITTERMAN:

10 Q. In paragraph 4, do you see it's says, are you
11 changing your name?

12 A. Yes.

13 Q. Can you read that to us?

14 A. "I request that my name be changed to none."

15 Q. Okay. So he wasn't changing his name on that
16 date from Jesus Vicente Santamaria according to that
17 form?

18 MR. BARSKY: Object to the form.

19 THE WITNESS: According to this.

20 MS. KITTERMAN: And then I'll mark this as
21 Exhibit 3.

22 (Plaintiff's Exhibit 3 was marked for
23 identification.)

24 BY MS. KITTERMAN:

25 Q. Have you seen that document before?

1 A. No.

2 Q. Do you know what it is?

3 A. Oath of allegiance.

4 Q. And what name is signed on that document?

5 A. Jess Ros Santamaria.

6 Q. Is that your husband's signature?

7 A. Yes.

8 Q. Do you know what the date of that document
9 is?

10 A. March 26th, 1990.

11 Q. Okay. So in January of 1990, his name was
12 Jesus Vicente Santamaria?

13 A. It's Vicente, yes.

14 Q. Vicente. I apologize. And then in March of
15 1990, his name was Ros, Jess Ros?

16 A. Jess Ros.

17 Q. Did he file any paperwork in between those
18 two months to change it; do you know?

19 MR. BARSKY: Object to the form.

20 THE WITNESS: I don't know.

21 BY MS. KITTERMAN:

22 Q. Okay. Have you ever met Mr. Schaller before
23 today?

24 A. Yes, I've seen him. Never.

25 Q. You've never officially met?

1 A. Yes.

2 Q. So you have not ever had a conversation with
3 Mr. Schaller?

4 A. Never.

5 Q. Okay. I believe we kind of touched on this,
6 but do you know what different investigations your
7 husband went through as a result of the request for
8 inquiry that is that Exhibit A?

9 MR. BARSKY: Object to the form.

10 THE WITNESS: No.

11 BY MS. KITTERMAN:

12 Q. You don't know?

13 A. No.

14 Q. Okay. Do you know whether your husband
15 suffered any damages as a result of the publication of
16 that request for inquiry?

17 MR. BARSKY: Object to the form.

18 THE WITNESS: Yes.

19 BY MS. KITTERMAN:

20 Q. What are they?

21 A. He was very upset.

22 Q. Very upset?

23 A. Yes.

24 Q. Okay.

25 A. I don't know physically what was going inside

1 of his body, but I know he was very upset.

2 Q. Do you know whether your husband suffered any
3 damage to his reputation as a result of that request for
4 inquiry?

5 A. Yes.

6 Q. How did he suffer damage to his reputation?

7 A. My brother was making jokes of him.

8 Q. Your brother?

9 A. Yes.

10 Q. What's your brother's name?

11 A. Emilio Jison.

12 Q. Okay. Anything else?

13 A. That's it.

14 (Discussion held off the record.)

15 THE WITNESS: E-m-i-l-i-o, Jison, same name
16 as my father.

17 BY MS. KITTERMAN:

18 Q. So no one else in the community that you know
19 of --

20 A. That I know of, yes.

21 Q. Okay. Let me just finish the question.

22 Nobody else in the community that you know of
23 has changed their opinion of your husband as a result of
24 that request for inquiry?

25 MR. BARSKY: Object to the form.

1 THE WITNESS: Yes.

2 BY MS. KITTERMAN:

3 Q. Yes, somebody has that you know of?

4 A. I'm agreeing with your question.

5 Q. Okay. I think I'm confused myself, probably.

6 Okay. Do you know whether your husband has
7 suffered any damages as a result of the actual
8 publication of that Page 76, the felony judgment?

9 MR. BARSKY: Object to the form.

10 THE WITNESS: No, I don't know.

11 BY MS. KITTERMAN:

12 Q. Okay. Do you know or have you heard of
13 anybody discussing this felony judgment about your
14 husband in a negative way?

15 A. I don't know.

16 Q. You don't know? So you haven't heard anybody
17 talking about it?

18 A. No, I don't know.

19 Q. Okay. Do you have any knowledge as to
20 whether or not Mr. Schaller knew that that felony
21 judgment was not related to your husband?

22 A. I don't know.

23 Q. You don't have any knowledge?

24 A. No.

25 Q. Do you have any knowledge as to where

1 Mr. Schaller got that felony judgment or obtained that
2 copy?

3 A. I don't know.

4 Q. You do not know. Okay.

5 MS. KITTERMAN: Quick break. We'll be right
6 back.

7 (A brief recess was taken.)

8 BY MS. KITTERMAN:

9 Q. Have you had any conversations with anybody
10 else with regard to anything that's related to this
11 particular lawsuit?

12 A. No.

13 MR. BARSKY: Object to the form.

14 BY MS. KITTERMAN:

15 Q. You talked to your husband about it; is that
16 correct?

17 MR. BARSKY: Object to the form.

18 BY MS. KITTERMAN:

19 Q. Did you talk to your husband about this case?

20 A. No. He told me about this case.

21 Q. Okay. He told you about this case. What did
22 he tell you?

23 MR. BARSKY: Object to the form.

24 BY MS. KITTERMAN:

25 Q. You can answer.

1 A. He's filed a lawsuit.

2 Q. Anything else?

3 A. No.

4 Q. Okay. Did you speak to your daughter about
5 this case?

6 A. No.

7 Q. Have you spoken to Christopher about this
8 case?

9 A. No.

10 Q. Have you spoken to -- I'm sorry, Vincent
11 about this case?

12 A. No.

13 Q. Do you know whether your husband has ever
14 helped write letters that are submitted to the media by
15 other people?

16 A. No.

17 Q. You don't know?

18 A. I don't know.

19 Q. Okay. Have you ever typed up letters from
20 your husband that he submits to the media?

21 A. Yes.

22 Q. When was that?

23 A. This week, last week.

24 Q. Do you do it often?

25 A. I do his typing.

1 Q. You do his typing?

2 A. (The witness nods.)

3 Q. Okay. And you've never typed anything that

4 was basically ghost drafted for another person?

5 MR. BARSKY: Object to the form.

6 THE WITNESS: No.

7 BY MS. KITTERMAN:

8 Q. Do you know whether your husband has

9 contributed to any campaign in 2010, whether it was cash

10 or check?

11 A. Check, yes.

12 MR. BARSKY: Object to the form.

13 BY MS. KITTERMAN:

14 Q. To who?

15 A. In 2010?

16 Q. Yes.

17 A. Oh, 2010. 2010, no.

18 Q. You don't know? I'm going to get to 2012.

19 You don't know that --

20 A. I don't know.

21 Q. Okay. Has he contributed to anybody's

22 campaign for the 2012 election?

23 MR. BARSKY: Object to the form.

24 THE WITNESS: Yes.

25

1 BY MS. KITTERMAN:

2 Q. Who?

3 A. David Aronberg.

4 Q. And what is David Aronberg running for?

5 A. State attorney.

6 Q. Okay. Of Palm Beach?

7 A. Palm Beach County, yes.

8 Q. Who else?

9 A. Bob Margolis.

10 Q. And what is Bob Margolis running for?

11 A. Mayor of Wellington.

12 Q. Who else?

13 A. Matty Mattioli.

14 Q. Can you spell that, please?

15 A. M-a-t-t-y. M -- last name is

16 M-a-t-t-i-o-l-i, I think.

17 Q. Okay. And what position is he running for?

18 A. Mayor of Royal Palm Beach.

19 Q. Who else?

20 A. Matt Willhite.

21 Q. Can you spell his last name?

22 A. W-i-l-l-h-i-t-e.

23 Q. What is he running for?

24 A. Council, Wellington.

25 Q. Council for Wellington?

- 1 A. Yes.
- 2 Q. Anybody else?
- 3 A. Jeff Green.
- 4 Q. And what is Jeff running for?
- 5 A. Council of Wellington.
- 6 Q. Anybody else?
- 7 A. Jeff Hmara, H-m-a-r-a.
- 8 Q. What is he running for?
- 9 A. Council, Royal Palm Beach.
- 10 Q. Sorry. Did you say Jeff Green went for
11 council of Wellington or Royal Palm Beach?
- 12 A. Yes, Wellington.
- 13 Q. And Matt Willhite is Wellington as well?
- 14 A. Yes.
- 15 Q. Okay. Anybody else?
- 16 A. Ryan Liang, L-i-a-n-g. I think that's how
17 you spell it.
- 18 Q. Okay. And what is Ryan running for?
- 19 A. Loxahatchee Groves council.
- 20 Q. Anybody else?
- 21 A. I can't remember if he has others.
- 22 Q. Okay. Is your husband seeking to run for
23 election for any other position?
- 24 A. No.
- 25 Q. In 2010 he did, in fact, win the election for

1 Palm Beach County Commission?

2 A. Yes.

3 MS. KITTERMAN: I believe -- yes, I believe
4 that's all I have for you today.

5 CROSS EXAMINATION

6 BY MR. BARSKY:

7 Q. I'm just going to ask a couple of quick
8 questions. There's been a lot of talk about your name,
9 your husband's name, middle names, et cetera.

10 You and your husband are originally from the
11 Philippines; correct?

12 A. Yes.

13 Q. The naming conventions used in the
14 Philippines are different from those used here in the
15 United States; correct?

16 A. Yes.

17 Q. Could you describe for us how middle names in
18 the Philippines work?

19 A. It's automatically your mother's maiden name.

20 Q. So your mother's -- your maiden name was
21 Jison?

22 A. My maiden name before I was married was
23 Gamboa, G-a-m-b-o-a. And then so Jison is my father's
24 name. So when I got married, Jison became my middle
25 name.

1 Q. Did you have to do anything to make that
2 change effective?

3 A. No, it's automatic.

4 Q. It's automatic under Filipino law?

5 A. Yes.

6 Q. And you were married in the Philippines?

7 A. Yes.

8 Q. What about for your husband, his middle name
9 is currently Ros; correct?

10 A. That's his mother's maiden name.

11 MR. BARSKY: I have nothing further.

12 MS. KITTERMAN: I have nothing. Do you want
13 to instruct her on reading or waiving?

14 MR. BARSKY: Sure. We're going to read.

15 MS. KITTERMAN: Okay. We're done.

16 MR. BARSKY: You're not going to order?

17 MS. KITTERMAN: Oh, yes, sorry. I am going
18 to order.

19 MR. BARSKY: Copy, mini, ASCII.

20 We need to talk about redacting the personal
21 medical information out of the transcript as well.

22 MS. KITTERMAN: That's fine. I think the
23 only thing that she testified to is that he had
24 mitral valve heart disease.

25 MR. BARSKY: Correct.

1 MS. KITTERMAN: Is that not public?

2 (Discussion held off the record.)

3 MR. BARSKY: Back on the record, I've asked
4 that we redact the personal medical information
5 regarding Jess Santamaria from the record, and
6 counsel for the defendant has declined to do so.
7 So we will address that if and when it becomes an
8 issue to comply with the Florida Rules of Judicial
9 Administration.

10 (Deposition concluded at 1:04 p.m.)

11 - - -

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CERTIFICATE OF OATH

THE STATE OF FLORIDA
COUNTY OF PALM BEACH

I, the undersigned authority, certify that
VICTORIA J. SANTAMARIA personally appeared before me and
was duly sworn.

Dated this 17th 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

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 Court 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 17th day of March, 2012.

Pamela J. Sullivan, RPR, FPR, CLR

1 March 17, 2012
2 VICTORIA J. SANTAMARIA
3 C/o DANIEL J. BARSKY, ESQUIRE
4 SHUTTS & BOWEN, LLP
5 525 Okeechobee Blvd., Ste. 1100
6 West Palm Beach, FL 33401
7 IN RE: SANTAMARIA V. SCHALLER
8 CASE NO.: 50-2011-000246XXXX MB

9 Dear Ms. Santamaria:

10 Please take notice that on Monday, the 12th of
11 March, 2012, you gave your deposition in the
12 above-referred matter. At that time, you did not waive
13 signature. It is now necessary that you sign your
14 deposition.

15 As previously agreed to, the transcript will be
16 furnished to you through your counsel or counsel for
17 Plaintiff. Please read the following instructions
18 carefully:

19 At the end of the transcript you will find an
20 errata sheet. As you read your deposition, any changes
21 or corrections that you wish to make should be noted on
22 the errata sheet, citing page and line number of said
23 change. DO NOT write on the transcript itself. Once
24 you have read the transcript and noted any changes, be
25 sure to sign and date the errata sheet and return these
26 pages to me.

If you do not read and sign the deposition within a
reasonable time, the original, which has already been
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.

Very truly yours,

Pamela J. Sullivan, RPR, FPR, CLR
Signature Court Reporting, Inc.
105 South Narcissus Avenue
Suite 400
West Palm Beach, Florida 33401
561.659.2120

I do hereby waive my signature.

VICTORIA J. SANTAMARIA

VICTORIA J. SANTAMARIA

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.

VICTORIA J. SANTAMARIA

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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: VICTORIA J. SANTAMARIA
DATE TAKEN: March 12, 2012

DO NOT WRITE ON TRANSCRIPT - ENTER CHANGES HERE

PAGE #	LINE #	CHANGE	REASON
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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: _____

SIGNATURE OF DEPONENT: _____