

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

ORIGINAL  
FILE COPY

Comprehensive Review of the  
Revenue Requirements and Rate  
Stabilization Plan of Southern  
Bell Telephone and Telegraph  
Company

Docket No. 920260-TL

In re: Investigation into the  
Integrity of Southern Bell's  
Repair Service Activities and  
Reports

Docket No. 910163-TL

Show Cause Proceeding Against  
Southern Bell Telephone and  
Telegraph Company for Misbilling  
Customers

Docket No. 900960-TL

Investigation into Southern Bell  
Telephone and Telegraph  
Company's Compliance with Rule  
25-4.110(2), F.A.C.

Docket No. 910727-TL

In Re: Petition of Intermedia  
Communications of Florida, Inc.  
for Expanded Interconnection for  
AAVs within LEC Central Offices

Docket No. 921074-TP

In re: Investigation into  
which local exchange company  
(LEC) services are effectively  
competitive in 1993

Docket No. 930046-TL

In re: Amendment of Rule  
25-4.0345, F.A.C., Customer  
Premise Equipment and Inside  
Wire

Docket No. 930485-TL  
Filed July 15, 1993

CITIZENS' MOTION TO DISQUALIFY COMMISSIONER THOMAS M. BEARD

The Citizens of Florida, by and through Jack Shreve, Public

Counsel, move to disqualify Commissioner Thomas M. Beard from further participation in all dockets in which Southern Bell is a party and all rulemaking proceedings affecting local exchange telecommunications companies.

#### BACKGROUND

1. Commissioner Beard first met Mary Daudelin at the San Antonio, Texas airport following a conference sponsored by the National Association of Regulatory Utility Commissioners (NARUC). Ms. Daudelin was (and still is) a manager employed by BellSouth Telecommunications, Inc., in the area of regulatory policy and planning.

2. Within a week or two of that meeting Commissioner Beard and Ms. Daudelin started seeing each other frequently, staying at each other's homes and traveling together. They stayed together at St. George Island, Florida, on three occasions. On the first visit to St. George Island, Ms. Daudelin paid the rental fee for their stay from her personal funds.<sup>1</sup>

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<sup>1</sup> See attachment 1, a memorandum of Edward W. Turner, investigator for the Department of Legal Affairs, concerning an interview of Mary Daudelin conducted on May 24, 1993. Mr. Turner discusses the initial meeting between Commissioner Beard and Mary Daudelin and the visits to St. George Island at pages 3 of 5 and 4 of 5. Because the attachments to this motion are voluminous, they are attached only to the original filed with the Division of Records and Reporting at the Florida Public Service Commission. Copies of the attachments will be provided to any party upon request.



3. Reportedly Commissioner Beard states that his relationship with Ms. Daudelin was only a business relationship. Ms. Daudelin, on the other hand, states that the relationship was predominately personal. They talked on the phone approximately every other night over a period of months.<sup>2</sup> At one point while visiting Tallahassee, they looked at houses.<sup>3</sup> They also visited a friend of Commissioner Beard who works for United Telephone Company.<sup>4</sup>

4. Ms. Daudelin provided documents to Commissioner Beard on two occasions. She recalls faxing documents from her office at BellSouth Telecommunications, Inc., to Commissioner Beard at the Florida Public Service Commission concerning Open Network Architecture (ONA). Also, at the NARUC meeting held in Washington, D.C. in February and March, 1993, she provided Commissioner Beard a BellSouth Telecommunications, Inc., "talk from" sheet providing the company's position on depreciation reform.<sup>5</sup> Commissioner Beard was unable to produce either of these documents in response to a request under Florida's Public Records Act.<sup>6</sup>

5. No later than the Spring of 1992, Southern Bell

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<sup>2</sup> See attachment 1 at page 3 of 5.

<sup>3</sup> See attachment 1 at page 4 of 5.

<sup>4</sup> See attachment 1 at page 4 of 5.

<sup>5</sup> See attachment 1 at page 5 of 5.

<sup>6</sup> See attachment 2.

officials, including Southern Bell attorneys, were aware of the relationship between Ms. Daudelin and Commissioner Beard.<sup>7</sup> Neither Commissioner Beard nor Southern Bell revealed that relationship to parties involved in proceedings with Southern Bell before the Florida Public Service Commission.

6. Commissioner Beard first met Alma Paruolo at the Ocean Reef Club in the Florida Keys in May, 1992, while attending a Florida Telephone Association (FTA) meeting.<sup>8</sup> Ms. Paruolo is a manager at Southern Bell earning approximately \$34,100 per year. Subsequent to the meeting in the Florida Keys, Ms. Paruolo and Commissioner Beard traveled together frequently and stayed at each other's homes many times.<sup>9</sup> They have traveled to Washington, D.C., and have traveled together within the states of California and Florida.<sup>10</sup>

7. On at least two occasions they have had dinner with Anthony M. Lombardo, an Assistant Vice President of Southern Bell. One dinner was in the Florida keys during the FTA meeting,<sup>11</sup> and the other was in Washington, D.C.<sup>12</sup> At the Washington, D.C. dinner

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<sup>7</sup> See attachment 1 at page 4 of 5.

<sup>8</sup> See attachment 3 at page 70.

<sup>9</sup> See attachment 3 at pages 97-98, 101-121, 129-135.

<sup>10</sup> See attachment 3 at pages 92-95, 121-123, 129.

<sup>11</sup> See attachment 3 at page 77.

<sup>12</sup> See attachment 3 at pages 126-128, 219.

Commissioner Beard brought a bottle of champagne to celebrate the Lombardos' wedding anniversary. Mr. Lombardo charged his portion of the expense and his wife's portion of the expense for both meals to Southern Bell as a business meal expense.<sup>13</sup>

8. Southern Bell officials knew about the relationship between Commissioner Beard and Ms. Paruolo by no later than November, 1992.<sup>14</sup> Neither Commissioner Beard nor Southern Bell revealed that relationship to parties involved in proceedings with Southern Bell before the Florida Public Service Commission.

9. On June 28, 1993 Commissioner Beard issued a press release announcing he had married Ms. Paruolo.<sup>15</sup> The press release stated that as a result of his marriage, he voluntarily made a decision to permanently recuse himself from any further matters "filed on behalf of his wife's employer."

10. On July 2, 1993 the Citizens sent Commissioner Beard a letter asking him to clarify the press release.<sup>16</sup> The letter asked whether he intended to recuse himself from all dockets in which Southern Bell is a party and recuse himself from all rule dockets affecting local exchange telecommunications companies. No response

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<sup>13</sup> See attachment 4.

<sup>14</sup> See attachment 3 at page 213.

<sup>15</sup> See attachment 5.

<sup>16</sup> See attachment 6.



has been received to that letter. The purpose of that letter was to avoid a situation where it was impossible to determine which dockets Commissioner Beard intended to vote on and which dockets he intended to recuse himself from.

11. Notwithstanding Commissioner Beard's June 28, 1993 press release and our letter dated July 2, 1993, Commissioner Beard continues to vote on matters affecting the substantial interests of Southern Bell. For example, at the July 6, 1993 Commission agenda conference, Commissioner Beard voted to deny a petition for rulemaking by Donald L. Pevsner to abolish automatic rounding-off of additional long distance minutes after the first minute. The petition, if granted, would have changed Southern Bell's intraLATA long distance billing.

#### ANALYSIS

12. §120.71, Florida Statutes (1991) states that any individual serving alone or with others as an agency head may be disqualified from serving in an agency proceeding for bias, prejudice, or interest. This statute applies to the Commission. City of Tallahassee v. Florida Public Service Commission, 441 So.2d 620 (Fla. 1983).<sup>17</sup> A similar standard applies to judges. A motion to disqualify a judge must show that the party fears that he or she

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<sup>17</sup> Commission rule 25-21.003 also uses the terms bias and prejudice as bases for disqualifying a Commissioner.

will not receive a fair trial because of specifically described prejudice or bias of the judge, or other enumerated grounds, including interest. Rule 2.160(d), Rules of Judicial Administration. Cases construing grounds for disqualification of judges are therefore relevant to the meaning of the terms bias, prejudice, and interest concerning disqualification of Commissioners.

13. In McKay v. McKay, 488 So.2d 898 (Fla. 3d D.C.A. 1986), a circuit judge designated as administrative judge in a case refused to step down in a case, despite a past social relationship with one of the parties, because he was only acting administratively in the case. The district court of appeals found this to be an erroneous view and decided that the judge should have disqualified himself from acting administratively or otherwise in the case because he was an admitted former social companion of one of the parties. Here, Commissioner Beard has not only had a prior relationships with employees of Southern Bell, but is now married to one of those employees.

14. Four matters were found sufficient to disqualify the trial judge in the case of St. George Island, LTD., v. Rudd, 547 So.2d 961 (Fla. 1st D.C.A. 1989). The four matters were (1) that the son of the judge was an employee of one of the plaintiffs; (2) the judge was observed having dinner with one of the plaintiffs during the pendency of the action; (3) plaintiffs provided

something of value to the judge during the pendency of the action; and (4) two of the plaintiffs may have taken the judge on a fishing trip during the pendency of the action.

15. The actions of Commissioner Beard are similar to the four matters described in St. George Island: (1) Commissioner Beard has had relationships with two employees of Southern Bell, and is now married to one of those employees; (2) not only has he had dinner with Southern Bell Assistant Vice President A.M. Lombardo on several occasions, but on one of those occasions he brought a bottle of champagne with him to celebrate a wedding anniversary of Mr. and Mrs. Lombardo; (3) Southern Bell manager Mary Daudelin paid the weekend rental for a house on St. George Island at which Commissioner Beard stayed, and Commissioner Beard is now married to an employee of Southern Bell who receives a salary from the company; and (4) Commissioner Beard has socialized with Southern Bell employees at various conferences, such as NARUC and Florida Telephone Association conferences.

#### CONCLUSION

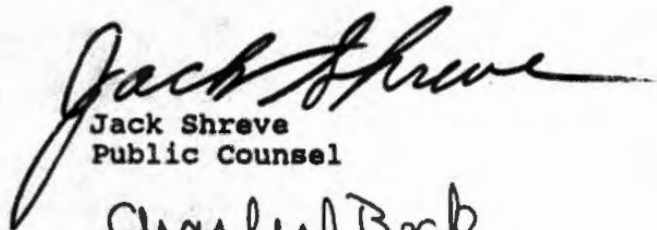
16. The Citizens of Florida fear we will not receive a fair hearing before Commissioner Beard in matters concerning Southern Bell. We therefore request the disqualification of Commissioner Beard from hearing any matters in these and all other dockets in which Southern Bell is a party, as well as all rulemaking



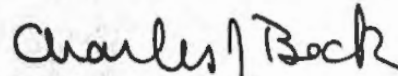
proceedings affecting local exchange telecommunications companies.

WHEREFORE, the Citizens request that Commissioner Thomas M. Beard be disqualified from further participation in all dockets in which Southern Bell is a party and all rulemaking proceedings affecting local exchange telecommunications companies.

Respectfully submitted,



Jack Shreve  
Public Counsel



Charles J. Beck  
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Attorneys for the Citizens of  
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# **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a copy of the foregoing has been furnished by U.S. Mail or hand-delivery to the following parties on this 15th day of July, 1993.

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*Charles J. Beck*  
Charles J. Beck  
Deputy Public Counsel

**ATTACHMENT 1**

## MEMORANDUM

TO: File

FROM: Ed Turner *ET*

DATE: May 26, 1993

SUBJECT: Interview of Mary Daudelin

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On May 24, 1993, Edward W. Turner, Investigator for the Department of Legal Affairs, was present at the law offices of Paul, Hastings, Janofsky & Walker, 133 Peachtree Street, Atlanta, Georgia, when an interview of Mary Daudelin took place. The following are the results of that interview:

Daudelin graduated from Emory University in 1974 with a B.A. degree in Mathematics. She first went to work for Bell South in Atlanta as a computer programmer in 1976. She wrote billing programs for the company's Automotive Message Accounting System. In 1981 she left Bell South for personal reasons. She returned to Bell South in 1985 as a computer programmer.

In 1986, her husband, who also worked for Bell South, was transferred to Charlotte, North Carolina. She took a position in the Controller's Office of the Southern Bell Office in Charlotte. She was assigned to the Carrier Access Billing System Organization. In 1987 she received a promotion to the position of manager, supervising a group of 30 employees and three supervisors. In June 1988, Daudelin filed for a legal separation from her husband and requested that Southern Bell transfer her back to their Atlanta office.

In October 1988, she received a transfer to Bell South in Atlanta to the Corporate Accounts Department. In this position, she worked in the Equal Access Service Center and supervised four managers and 12 other employees. She dealt with the different carriers in facilitating the Preferred Interchange Carrier (PIC) change process. This Equal Access process allowed customers to pick their own long distance carrier without having to dial a series of numbers to access the system.

In January 1991, the Equal Access Service Center began moving its operation to Birmingham, Alabama. Not wanting to



relocate to Birmingham, Daudelin applied for a vacant position in the Mechanical Methods Group. She was granted the transfer and managed three or four management personnel. Several months later she decided she wanted to move to another department. She spoke to some friends and learned of an opening in the Regulatory Section. She applied for the position, interviewed for the job several week later and was subsequently hired.

In March 1991, Daudelin became Manager, State Regulatory, responsible for Florida, Georgia, South Carolina and North Carolina. She was responsible for the Local Service Section of Tariffs, Deregulated Portion of Inside Wiring and Memory Call and for Open Network Architecture Tariffs. Here she began dealing with regulatory matters and answering tariff interpretation questions from Southern Bell regulatory personnel in the four states. In addition, she was responsible for tariff matters in front of or to be presented to the Public Service Commissions (PSC) in the four states she covered.

Daudelin states she gained tariff experience when she was a programmer. While working in the Carrier Access Billing Service program, she would have to become familiar with the various approved tariffs and then design a program to ensure proper billing.

By June 1991, Daudelin was familiar enough with her job that she was dealing with the different Bell South regulatory personnel in each of the four states and was providing them with information to use when Bell South regulatory personnel dealt with those respective states' Public Service Commissions. Daudelin states that some of the inquiries from the states could be answered quickly and others would take up to a week to answer.

In June or July 1991, Daudelin traveled to Tallahassee, Florida, to attend the Florida PSC agenda meeting. On the agenda was Southern Bell's Bulk Calling Line Identification Tariff. She traveled to Tallahassee to assist the Florida Bell South Regulatory people and to be available to answer any questions that they could not answer. Daudelin made the trip at the request of her boss, Nancy Sims. Daudelin stayed one night. She did not know Tom Beard at this point in time. She knew him to be a Florida Public Service Commissioner because she had a list of all the commissioners for the four states she handled. Daudelin added that it is possible that Susan Clark was sworn in as a new commissioner during this meeting.

In November 1991, she was promoted to manager, Regulatory Policy and Planning. She was responsible for Federal legislation analysis. Bills before Congress were sent to her to be routed to those interested to get their feedback on Bell South's position. She then prepared an analysis of Bell South's position on the legislation and sent it to the Washington, D.C. Bell South office for their regulatory personnel.

Daudelin does not review any state's legislation in this position. She does deal with Southern Bell's regulatory personnel on rule changes within the states.

In addition, she supports the Bell South Washington D.C. office with the National Association of Regulatory Utility Commissions (NARUC) and works with the South East Association of Regulatory Utility Commissions (SEARUC).

Daudelin states that she has a Southern Bell Long Distance Credit Card and an American Express Credit Card. She does not have an expense allowance for entertainment. She also has a personal long distance credit card.

In November 1991, Daudelin attended a NARUC conference in San Antonio, Texas. During the conference, she attended a session where Tom Beard spoke. At the time, she thought he was articulate and very knowledgeable about telecommunications issues. When she arrived at the airport for her flight to Atlanta, she observed Beard in a lounge. She introduced herself to Beard and told him she worked for Bell South. She discovered they were on the same flight and waited approximately three hours for their flight together. They spent their time talking about children and being a single parent. They did not talk about business at any time. She said they exchanged phone numbers and that this was her idea.

After returning to Atlanta, she called Beard in Tallahassee and suggested that if he were in Atlanta to call her. There were several other calls at night and Beard decided he would visit her. Beard came to Atlanta the weekend before or right after Thanksgiving 1991. He drove to Atlanta on Friday evening and stayed at Daudelin's home until he left on Sunday afternoon. Daudelin stated that all of the calls between Beard and her were personal and that no business was discussed.

Several weeks later, just before Christmas 1991, Daudelin rented the Pinnacle House at St. George Island, Florida, for the weekend. She called Beard and invited him to join her. They met at St. George Island and spent the weekend together without either her children or his. Daudelin added that all of the expenses for the weekend were paid by her. They did not discuss any business during this trip.

During the period prior to this trip, Daudelin said that she and Beard talked every night or every other night on the telephone. She said that they each initiated about half of these phone calls. These calls were all personal and at no time did they discuss business.

The week after Christmas, 1991, Daudelin went to St. George Island and met Beard. She had her children with her and stayed approximately one week and Beard and his children joined them. She said that prior to that trip, there were numerous phone calls

between Beard and her.

During January or February, 1992, Daudelin made two trips to Tallahassee to visit Beard. She drove to Tallahassee on both trips and brought her children on one of the trips. She stayed at Beard's home during each of these visits. While she was in Tallahassee, Daudelin said she did not meet or visit with any Southern Bell officials.

On each of these two visits, Beard took her to the home of someone connected with United Telephone. She does not know nor can she recall in what capacity this person was connected with United Telephone. During these visits to this person's home, there was no regulated business discussed. She was left with the impression that Beard and this person were friends.

On one of her two weekend trips to visit Beard, she and Beard went looking at homes. She believes that Beard said that maybe she could get transferred to Tallahassee and if so, they would need room for six kids. Daudelin stated that at this time, she was serious about Beard. It was while they were out looking at homes that they visited the United Telephone person. Daudelin added they only looked at houses on one of the two visits she made to Beard's in Tallahassee.

There was one occasion when Beard was in Atlanta on business and he stayed at her house. She recalls that they cooked out during this visit.

During her children's spring break from school, she and Beard spent the time at St. George Island. Sometime during this trip Beard told her about some pending Florida legislation relating to the ethics of public officials having personal relations with people from those industries with which the official may have contact. Beard told her there would be no conflict if the legislation did not pass. She added that Beard understood her difficulty with a long distance relationship and that he did not pressure her to stay in the relationship. It was at this time that they mutually agreed to stop dating.

When she returned to Atlanta, she was very concerned and contacted the Bell South Legal Department. She spoke with an attorney by the name of Bob Southerland who in turn referred her to a conflict of interest expert, Keith or Kevin Cockler, also a Bell South attorney. She explained the matter to Cockler and then never heard from him.

Daudelin went to her boss, Tuyla Martin, to tell her that she had been but was no longer dating Tom Beard. Martin told her that she, Martin, had already heard about it from Carlton Baker. Daudelin does not know how Baker knew about it.

In June 1992, Beard and Daudelin were both at a SEARUC Conference in Little Rock, Arkansas. It was at this conference



that Beard abruptly ended their relationship. During the time between the spring break trip to St. George Island and the conference in Little Rock, Beard and Daudelin only spoke on the phone two or three times.

Since June 1992, she and Beard have talked on the phone several times. Each call was personal in nature and did not involve any business conversation. She did not see Beard at the NARUC meeting in Seattle but may have had drinks with him at the NARUC Conference in Los Angeles. Cindy Cox, a Bell South employee from Washington, D.C., was present when Daudelin and Beard had drinks. Daudelin stated that no business was discussed while they had drinks.

Daudelin stated that during the NARUC meeting in Washington, D.C., in February or March 1993, there were meetings held to discuss the Depreciation Reform Resolution that NARUC was considering. She had with her a Bell South Talk From Sheet relating to the Resolution and Beard asked her for a copy. During a break, she told Anthony Lombardo about Beard's request and Lombardo told her to give Beard a copy, which she did. She added that on one other occasion she faxed to Beard the Federal ONA. To the best of her recollection she faxed the material to Tallahassee from her Atlanta office.

ET:eb



**ATTACHMENT 2**

State of Florida

THOMAS M. BEARD  
Commissioner



FLETCHER BUILDING  
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**Public Service Commission**

June 22, 1993

Mr. Jack Shreve  
Office of the Public Counsel  
111 West Madison Street, Room 812  
Tallahassee, Florida 32399-1400

Dear Mr. Shreve:

I am in receipt of your public documents request dated June 21, 1993. In your letter your request a copy of each document provided to me by Southern Bell or any of its agents, since January 1, 1991, that is not officially filed in a docket file in the Division of Records and Reporting of this agency.

Concerning your request with regards to a FAX concerning Open Network Architecture (ONA) sent by Ms. Mary Daudelin. I have no recollection of ever having seen or received such a document.

With regard to your request for a BellSouth "talk sheet" regarding depreciation procedures proposed for the Federal Communications Commission (FCC) which was given to me by a BellSouth representative at the most recent Winter Meetings in Washington, D.C. I do recall having seen a handout that discussed four different methods of depreciation simplification which were the subject of an FCC Notice of Proposed Rulemaking (NPRM). A resolution commenting on the NPRM was adopted by NARUC at that meeting. I do not have that handout in my possession. It did not pertain to anything that was occurring in Florida and like much of the printed matter that is distributed at a typical NARUC meeting, it was not retained after the end of the meeting.

Any document sent to my offices by any utility that is regulated by this agency is screened by my staff in accordance with procedures approved by the Ethics Commission. In response to your request, I respectfully suggest that you conduct a review of those files in my offices since my files are open in accordance with the Public Records Act. You should contact Brenda Ferris to schedule a time that is mutually convenient.

Sincerely,

A handwritten signature of Thomas M. Beard in dark ink.

Thomas M. Beard  
Commissioner

TMB:brf

**ATTACHMENT 3**

**BEFORE THE PUBLIC SERVICE COMMISSION**

**DOCKET NO. 920260TL**

**COMPREHENSIVE REVIEW OF THE REVENUE  
REQUIREMENTS AND RATE STABILIZATION  
OF SOUTHERN BELL TELEPHONE AND  
TELEGRAPH COMPANY**

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**Dade City Regional Service  
Center, Suite 124S  
401 Northwest 2nd Avenue  
Miami, Florida  
Wednesday, May 5, 1993  
11:20 a.m. to 5:30 p.m.**

**DEPOSITION OF ALMA DIAZ-PARUOLO**

**Taken before JOAN C. TIBBITS, Court Reporter and Notary  
Public in and for the State of Florida at Large, pursuant  
to Notice of Taking Deposition filed in the above cause.**

**COPY**



**APPEARANCES:**

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The Capitol, Suite 907  
Tallahassee, Florida 32399-1050  
On behalf of the State of Florida.

CHARLES J. BECK, Asst. Public Counsel  
The Florida Legislature  
111 West Madison Street/Room 812  
Tallahassee, Florida 32399-1040  
On behalf of the Public Counsel.

HARRIS R. ANTHONY, Esquire  
Southern Bell Telephone & Telegraph Co.  
Museum Tower Building/Suite 1910  
150 West Flagler Street  
Miami, Florida 33130  
On behalf of Southern Bell.

Mahoney, Adams & Criser, P.A.  
CHRISTINE RIEGER MILTON, Esquire  
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Jacksonville, Florida 32202  
On behalf of Southern Bell.

Sonnett, Sale & Kuehne, P.A.  
By: JON A. SALE, Esquire,  
and BENEDICT P. KUEHNE, Esquire  
One Biscayne Tower  
Two South Biscayne Boulevard  
Miami, Florida 33131-1802  
On behalf of Alma Diaz-Paruolo.

ANGELA B. GREEN, Esquire  
101 East Gaines Street  
Tallahassee, Florida 32399-0863  
On behalf of the Florida Public Service Commission.

**ALSO PRESENT:**

WILDA L. WHITE, Herald Staff Writer  
BILL MOSS, St. Petersburg Times Staff Writer

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**WITNESS:**

**DIRECT CROSS REDIRECT RECROSS**

**ALMA DIAZ-PARUOLO**

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1 (Thereupon, the following proceedings were had:)

2 MR. SALE: May I put one statement on  
3 the record.

4 Since this is the first time you and I  
5 have talked, I would like to make a record of the  
6 conversation I had with Mr. Twomey. I told Mr.  
7 Twomey this is hopefully just to set the  
8 parameters of our position that Ms. Paruolo is  
9 anxious to cooperate with this inquiry, has  
10 nothing to hide, and is prepared to answer any  
11 appropriate questions in any particular areas, but  
12 the one concern we expressed was once those  
13 legitimate areas are covered to the satisfaction  
14 of a reasonable observe, that we stressed some  
15 concern about going through strictly personal  
16 matters which I think would be inappropriate, and,  
17 amongst other things, could even violate Article  
18 I, Section 23, of the Constitution, the right to  
19 privacy. So, the only area we have any concern  
20 with are things being clearly personal, on  
21 personal details that have no arguable bearing on  
22 Southern Bell's business or PSC business. But in  
23 the legitimate areas, Mrs. Paruolo is prepared to  
24 answer all of your questions.

25 MR. CURINGTON: We appreciate your

1 privacy concerns and we will try to honor that. We  
2 may disagree when crossing that line.

3 MR. SALE: We will cross that bridge  
4 when we come to it.

5 Thereupon:

6 ALMA DIAZ-PARUOLO  
7 was called as a witness and, having been duly  
8 sworn, was examined and testified under oath as  
9 follows:

10 DIRECT EXAMINATION

11 BY MR. CURINGTON:

12 Q. Ma'am, would you please state your  
13 name for the record and present address of  
14 employment.

15 A. My name is Alma Diaz-Paruolo. I work  
16 at 150 West Flagler Street, Suite 1801, Miami,  
17 Florida.

18 Q. I'm sorry, would you pronounce your  
19 last name one more time.

20 A. It's Alma Diaz-Paruolo.

21 Q. Do you prefer Diaz-Paruolo?

22 A. It doesn't matter. You can say Alma  
23 D, or whatever.

24 Q. My name is Jerry Curington. I am an  
25 assistant attorney general. I represent the



1 Attorney General's Office in this matter. We are  
2 here today to simply gather information to  
3 determine whether or not Commissioner Thomas B.  
4 Beard should appropriately sit on matters in  
5 which Southern Bell has pending before PSC.  
6 That's the purpose of our discovery here today.  
7 We are not here to trick you or fool you. If I  
8 phrase a question you do not understand or do not  
9 hear, I will be glad to rephrase it. We are  
10 simply here to get the facts.

11 Could you very briefly tell us your  
12 educational background.

13 A. I graduated from Miami Coral Park High  
14 in -- gosh, I think 1975. I went to Miami-Dade  
15 Community College, and then went to the  
16 University of Miami. I was going for a systems  
17 analysis degree. I did not finish.

18 Q. Have you received an A.A.?

19 A. No, I did not.

20 Q. How many college credits have you  
21 earned?

22 A. Golly, I have no idea.

23 Q. Did you have any class sophomore or  
24 junior degrees?

25 A. No, because I was going at night. I

1 was working during the day and just going at  
2 night.

3 Q. Could you very briefly advise us of  
4 your employment prior to working for Southern  
5 Bell?

6 A. I worked for the FAA one summer  
7 briefly before I was employed by Southern Bell. I  
8 believe I was 17 years old.

9 Q. Were you in high school?

10 A. Yes, I was. It was the summer between  
11 the eleventh and twelfth grades.

12 Q. That was here in Miami?

13 A. Yes, it was.

14 Q. What were you doing for the FAA?

15 A. Oh, gosh, I think a general clerk type  
16 thing.

17 Q. When were you first employed by  
18 Southern Bell?

19 A. December 17, 1974.

20 Q. Was this pretty much right out of  
21 school?

22 A. I was still in high school and working  
23 part-time.

24 Q. What year did you graduate from high  
25 school?

1 A. I believe it was '75.

2 Q. Have you worked for any other  
3 affiliates or have you always worked with  
4 Southern Bell?

5 A. I have always worked for Southern  
6 Bell.

7 Q. For the purpose of this deposition, I  
8 would like my use of the term "Southern Bell" to  
9 include affiliates or whatever, unless it  
10 requires clarification, okay?

11 A. Okay.

12 Q. Could you describe your first job with  
13 Southern Bell?

14 A. I worked in the mail room.

15 Q. How long did you do that?

16 A. I really can't remember -- two years,  
17 maybe.

18 Q. What was your next position?

19 A. I was a secretarial stenographer in  
20 the medical department.

21 Q. What did that job entail?

22 A. Oh, just that I was a receptionist and  
23 did just general secretarial duties.

24 Q. Do you know shorthand?

25 A. Well, I used to.

1 Q. Do you use the stenograph machine?

2 A. No.

3 Q. Did you have to know medical terms?

4 A. No.

5 Q. Basically it was a secretarial-  
6 clerical type position?

7 A. That's correct.

8 Q. It was a promotion?

9 A. It was a higher pay rate than the mail  
10 room, yes.

11 Q. For what years or for how long did you  
12 do that? Approximations are sufficient.

13 A. Three years, four years. I really  
14 can't remember exactly.

15 Q. What was your next position?

16 A. I was a forecast assistant in the  
17 South Florida Forecasting Office.

18 Q. What years did you do that?

19 A. I probably did that for the three or  
20 four years following being in the medical  
21 department.

22 Q. Was that also a promotion?

23 A. Yes, it was.

24 Q. A higher pay rate?

25 A. Yes, it was.



1 Q. Did you have your supervisors  
2 throughout each of these positions?

3 A. Yes, we did.

4 Q. We will come back to that.

5 What was your next position?

6 A. I was a forecast assistant in the  
7 state forecasting office.

8 Q. Are those offices all in Miami?

9 A. Yes, they are all in Miami.

10 Q. Have you always worked in Miami?

11 A. Yes, I have always worked in Miami.

12 Q. What was the difference in duties  
13 between working for the South Florida office and  
14 the state office?

15 A. Well, in the South Florida office I  
16 was working access line forecasting and in the  
17 state office I was working in revenue  
18 forecasting.

19 Q. How many years did you do that?

20 A. I did that until 1988.

21 Q. Let me ask you, in revenue forecasting  
22 -- excuse my ignorance -- I am not familiar with  
23 these regulatory matters -- could you describe  
24 what revenue forecasting is used for?

25 A. Revenue forecasting?

1 Q. Yes.

2 A. Just for the company to project where  
3 they need to I guess spend money on growth and how  
4 well their products are going to do, that type of  
5 thing.

6 Q. It is projecting future revenues for  
7 the company?

8 A. That is correct.

9 Q. Projecting future number of customers  
10 and types of services?

11 A. They don't project customers.

12 Q. What do you project?

13 A. Revenues.

14 Q. Based upon what, if you don't know the  
15 customers?

16 A. All kinds of different data. I did  
17 not do the projections.

18 Q. What did you do?

19 A. I was a support person for the person  
20 who did the projections.

21 Q. What did your job entail?

22 A. I pulled out figures from the  
23 computer, pulled reports for them, that type of  
24 thing.

25 Q. Simplifying it, were you simply

1 putting the data into a computer?

2 A. That's correct.

3 Q. Did you understand the final report  
4 and the final results of your input?

5 A. To some degree, yes.

6 Q. Did you have any discretion as to what  
7 was input or how it was tabulated?

8 A. You're asking if I had input as to how  
9 these figures were attained?

10 A. Yes.

11 Did you have any discretion -- were  
12 you just putting in the numbers that someone put  
13 in front of you to put into a computer, or did you  
14 do analysis or tabulations?

15 A. No, I did not do analysis. I put the  
16 numbers in the computer.

17 Q. Not to be derogatory, that's a fairly  
18 easy clerical task?

19 A. Yes, uh-huh.

20 Q. Do you know what was done with that  
21 data once it was put into the computer?

22 A. Reports were sent out to certain  
23 people in the company.

24 Q. Do you know if those reports were ever  
25 used in front of the PSC?

1 A. I have no idea.

2 Q. Who was your supervisor in that  
3 position?

4 A. In revenue forecasting?

5 Q. Yes.

6 A. I worked for Rosie Soto.

7 Q. Would she know what is done with those  
8 reports?

9 A. She is retired. I imagine she would  
10 have.

11 Q. You have no idea what was done with  
12 that data compilation if you put it in the  
13 machine?

14 A. It was mailed out to employees.

15 Q. You saw to its distribution between  
16 co-employees or departments?

17 A. That's handled by another clerical  
18 person in a lower rated job.

19 Q. Under your supervision?

20 A. No, it was not under my supervision.  
21 That's not a supervisory position.

22 Q. But you have no personal knowledge as  
23 to whether or not that was distributed outside  
24 the company?

25 A. I have no idea.



1 Q. What was your next position after  
2 1988?

3 A. I was a staff assistant.

4 Q. Is that what you are today?

5 A. That is correct.

6 Q. From 1988 until today, have you been  
7 in the same position?

8 A. That is correct.

9 Q. Who is your supervisor?

10 A. Currently it is David Seymour, S-e-y-  
11 m-o-u-r.

12 Q. Did you have another supervisor in  
13 that same position earlier?

14 A. The first supervisor I had in that  
15 position was Larry Nixon, and after that I worked  
16 for Victor Beninate.

17 Q. Did Larry Nixon move on in the  
18 company?

19 A. He was transferred. It was a lateral  
20 transfer.

21 Q. Is he still in Miami?

22 A. I believe he's in West Palm Beach.

23 Q. I apologize if I don't recall the last  
24 name.

25 A. B-e-n-i-n-a-t-e.

1 Q. Did he move on from the company?

2 A. A lateral to Fort Lauderdale.

3 Q. Do they perform the same functions, do  
4 you know, with the company today?

5 Q. What do you mean? As they did in that  
6 job?

7 Q. Right.

8 A. No, they do not.

9 Q. They moved on to different positions,  
10 different job positions?

11 A. That's correct, uh-huh.

12 Q. What about David Seymour. how long has  
13 he been your supervisor?

14 A. Gosh, six months, eight months,  
15 somewhere in there.

16 Q. Are you a secretary today?

17 A. I would say I am a support person.

18 Q. Does the company have a job  
19 description for secretaries?

20 A. I'm sure they do.

21 Q. And a pay grade for secretaries?

22 A. They all have different pay rates for  
23 secretaries. There are different levels of  
24 secretarial support.

25 Q. Do you have any idea what range of pay

1 grades they have for secretaries?

2 A. Well, you're asking money-wise?

3 Q. Do they have like government G30  
4 through G50? Are they numbered grades one  
5 through ten?

6 A. Basically if you look at the May  
7 appraisal, the pay grades listed on that all fall  
8 more or less into a secretarial category.

9 Q. What is your current pay grade?

10 A. I am a pay grade one.

11 Q. A pay grade one?

12 A. That is correct.

13 Q. Can you explain the pay grade system  
14 to me briefly? Is it numerical, the higher the  
15 number, the higher the pay?

16 A. Generally, yes.

17 Q. Do you know what the range is for pay  
18 grades?

19 A. Pay grade one through eight, and then  
20 you have officers after that.

21 Q. Is there any pay grade below pay grade  
22 one?

23 A. Yes.

24 Q. What are they called?

25 A. I think there is AZ, AX, and AY.

1 Q. Those are lower pay grades?

2 A. One of them actually makes more money  
3 than a pay grade one, just a little bit more.

4 Q. Which one?

5 A. I don't know.

6 Q. Are secretaries generally at lower pay  
7 grades than staff services?

8 A. Yes, except for that one.

9 Q. So they are in a pay grade starting  
10 with a letter rather than a number?

11 A. That is correct.

12 Q. Do you consider yourself a secretary?

13 A. I wouldn't say that is exactly the  
14 correct title. I would say I'm a support person.

15 Q. What do you tell your friends when  
16 they ask you what you do?

17 A. I don't really talk with my friends  
18 about Southern Bell. When I leave the office, I  
19 like to forget about it, frankly.

20 Q. If you are ever asked what your job  
21 is, what do you respond?

22 A. I say I am a staff assistant.

23 Q. Do you have a current resume?

24 A. No, I don't.

25 Q. When is the last time you have done a



1 resume?

2 A. Oh, gosh, I have no idea. It's been a  
3 few years back.

4 Q. Do you know what that resume reflects  
5 in terms of your job description?

6 A. Basically what is on my performance  
7 appraisal.

8 Q. Have your job responsibilities from  
9 1988 to date been the same?

10 A. No, they have changed.

11 Q. How have they changed?

12 A. I have gotten more things added on.

13 Q. More responsibilities?

14 A. That's correct.

15 Q. Has your pay grade changed?

16 A. No, it has not.

17 Q. They have given you additional  
18 responsibilities?

19 A. Yes.

20 Q. Have they changed your job description  
21 when they added these additional duties?

22 A. No, they did not.

23 Q. What are your current job duties?

24 A. I am a supervisor over the clerical  
25 staff. I supervise the mail room for the Museum

1 Tower Building. I am the general support person  
2 for David Seymour. And I am training coordinator  
3 for the executive department. And I am the MTR  
4 coordinator for the executive department. MTR is  
5 mechanized time recording, which are the reports  
6 on which you input time when you are out, or  
7 whatever. And I guess basically that covers it.

8 Q. If we could go through each of those  
9 more specifically.

10 You supervise a clerical staff of how  
11 many?

12 A. Seven people.

13 Q. What pay grades are they?

14 A. They are nonmanagement. I have one  
15 wage scale of sixteen, five wage scale tens, and I  
16 think a wage scale two. She's the mail room  
17 person.

18 Q. You used a different term on me. Is  
19 "wage scale" different than "pay grade"?

20 A. Yes, they are nonmanagement employees.

21 Q. Does the pay grade one through eight  
22 that you mentioned apply to management?

23 A. That's correct.

24 Q. You are considered management?

25 A. That's correct.

1 Q. And above pay grade eight are  
2 officers?

3 A. Yes.

4 Q. Below pay grade one is wage scales?

5 A. Well, the secretarial titles are also  
6 considered managers. They are management  
7 positions.

8 Q. Which secretarial?

9 A. AX, AY, and AZ are all secretarial  
10 positions, but nonmanagement positions.

11 Q. Nonmanagement positions?

12 A. That's correct.

13 Q. The wage scale applies to  
14 nonmanagement?

15 A. That's correct.

16 Q. How is that listed or graded?

17 A. Well, it's in the contract. They are  
18 nonunion represented employees.

19 Q. No, I mean is the wage scale one  
20 through ten -- you said something about sixteen.

21 A. There are higher grade scales than  
22 that. I don't know what it goes up to. It's  
23 basically the same principle, the higher it is,  
24 the more they get paid.

25 Q. What do these seven people underneath

1       you do?

2           A.     One person is the mail person. She  
3       sorts the mail and goes around and picks it up and  
4       distributes it. One is the wage assistant, who is  
5       the back-up assistant. She supports the manager  
6       who does the employee information, the  
7       "Sunscriber," that type of thing, bulletins. And  
8       the other people are generally clerical support  
9       for the office.

10          Q.     Clerical responsibilities meaning  
11       typing, clerks, filing?

12          A.     Typing, answering the phone, filing,  
13       that is correct.

14          Q.     They are just basically support staff?

15          A.     That is correct.

16          Q.     They don't have an end product of  
17       their own or a goal?

18          A.     No, they don't.

19          Q.     The mail room I presume is self-  
20       explanatory?

21          A.     Yes.

22          Q.     For what? Is it by division? How  
23       much of the company is under the mail room that  
24       you supervise?

25          A.     Whoever is in that building who



1 reports to Southern Bell.

2 Q. You are responsible for the entire  
3 room, for the entire building?

4 A. For Southern Bell. There are firms  
5 and law firms that have nothing to do with  
6 Southern Bell.

7 Q. How many floors does Southern Bell  
8 have?

9 A. Two and a half floors.

10 Q. Two and a half floors in the building?

11 A. Yes.

12 Q. What floors are those?

13 A. Eighteen, nineteen, and half of  
14 twenty.

15 Q. You're on the eighteenth floor?

16 A. That's correct.

17 Q. Who else is in that building from  
18 Southern Bell?

19 A. The legal department, industry  
20 relations, the corporate external affairs staff  
21 office, the local corporate external affairs  
22 office. There are some comptroller people there.  
23 There are forecasting people there. And then  
24 there is executive staff, Joe Lacher, and a few  
25 people that report to him.

1 Q. Among the employees, that is  
2 considered the executive offices?

3 A. Pretty much, yes.

4 Q. What floors would include the  
5 executive offices?

6 A. Nineteen.

7 Q. Nineteen alone?

8 A. That's correct.

9 Q. What about eighteen and half of  
10 twenty?

11 A. Twenty has the comptroller and  
12 forecast people. Eighteen has the corporate  
13 external affairs people.

14 Q. They are not considered as part of the  
15 executive suite?

16 A. No.

17 Q. The nineteenth floor is Joe Lacher,  
18 who is the president?

19 A. Joe Lacher, yes, is the president of  
20 Southern Bell.

21 Q. What other corporate officers are  
22 there?

23 A. Cort Lantaf is there. Tom Loehman is  
24 there. And then--

25 Q. What are their positions, if you can

1 tell me?

2 A. Cort Lantaf is vice president of  
3 corporate and external affairs. Tom Loehman --  
4 gosh, I don't know. He's maybe assistant vice  
5 president of the comptrollers. And then there is  
6 the legal staff.

7 Q. Do you interact with the nineteenth  
8 floor people?

9 A. Sure.

10 Q. What kind of contact do you have with  
11 them?

12 A. I am their training coordinator and  
13 MTR coordinator.

14 Q. How often do you deal with people on  
15 the nineteenth floor?

16 A. Depending on how many training classes  
17 are going on, when you have a problem with MTR.  
18 You never know when you have a problem. It could  
19 be frequent or infrequent.

20 Q. Is there such a thing as an average  
21 work week or an average month? Are you talking to  
22 these people daily, monthly, weekly,  
23 semiannually?

24 A. Lately it has been pretty much daily.

25 Q. And it's to arrange training?

1 A. That's correct.

2 Q. For the people on the nineteenth floor  
3 or the people under their supervision?

4 A. The AVP's generally, I don't know how  
5 their training is arranged. There are people  
6 under them, and the legal department, which I  
7 arrange their training.

8 Q. So people from the assistant vice  
9 president on down, you arrange direct training  
10 for?

11 A. Sometimes for them, but rarely.

12 Q. What kind of training and how  
13 frequently do they go through training?

14 A. Well, there are all different kinds of  
15 things. We have PC training. We have all kinds  
16 of training. We have PC training. We have five  
17 kinds of PC training. There is management  
18 training, coaching skills, stress management,  
19 presentation skills. There are just quite a few.  
20 Lately we have had epic training and strategic  
21 performance, which is a new program form that  
22 they are training everybody on which is mandated.  
23 Both classes are mandated, which generates a lot  
24 of work for me.

25 Q. Is the company very conscientious



1 about continued training, continued education for  
2 employees?

3 A. I would say yes.

4 Q. Do you find that these people who you  
5 organize training for are typically going to  
6 training sessions once a year, twice a year?

7 A. I would say more than that.

8 Q. Would the average employee go?

9 A. It depends. A lot of the training  
10 courses, you request them. Some people take a  
11 lot.

12 Q. The employee?

13 A. Right. Some are mandated, such as the  
14 epic and strategic performance. The others are  
15 up to your discretion. A lot of people like to  
16 take a lot of training. Some are not interested.

17 Q. A minimum amount of training is  
18 expected?

19 A. Yes.

20 Q. And at least once or twice a year?

21 A. I would say minimally, yes.

22 Q. Would you explain to me the MTR  
23 responsibilities?

24 A. MTR is a time reporting system used  
25 throughout Bell South. It's called mechanized

1 time reporting. It's a computer system where you  
2 input time reports, just overtime, or if you are  
3 out sick or on vacation time, or any exception  
4 time that you may have that are reported to  
5 certain codes such as after Hurricane Andrew, we  
6 had certain codes we needed to refer to, because  
7 those expenses are separate from normal  
8 activities.

9 Q. While on the topic of time, let me ask  
10 you, are you a salaried employee where you earn  
11 your annual salary whether you work forty hours a  
12 week or would you be docked pay if you don't work  
13 forty hours a week?

14 A. I am a salaried employee.

15 Q. You would get paid even if you work a  
16 30-hour week?

17 A. I don't ever work a 30-hour week.

18 Q. Hypothetically.

19 A. Hypothetically, I don't think they  
20 would be happy if I worked a 30-hour week.

21 Q. Would they dock your pay?

22 A. I don't know if they would dock my  
23 pay. I am sure they would have a talk with me.  
24 That would not be acceptable, no.

25 Q. You don't have an hourly rate?

1           A.     No, I do not have an hourly rate, that  
2     is correct.

3           Q.     You are paid an annual salary, but  
4     it's expected you work a 40-hour week?

5           A.     Yes.

6           Q.     If you don't work, you are expected to  
7     take sick leave, annual sick leave or vacation  
8     time?

9           A.     That's correct. It depends on the  
10    circumstances. I would take one of those.

11          Q.     What type of leaves are available?

12          A.     Well, we're talking--

13          Q.     Any type of absence.

14          A.     There is excuse time, unpaid. You  
15    have vacation time.

16          Q.     Wait.

17                 If you could describe each one.

18          A.     Excuse time is called "E" time. It's  
19    when you want to take time off that you don't want  
20    to be paid. It's at your own personal discretion.  
21    You say to your boss, "I want to take some E  
22    time," for whatever reason. Then there is  
23    vacation time.

24          Q.     Would you be eligible for E time or  
25    would you need that?



1           A.     Everybody is eligible, any employee  
2     is.

3           Q.     Since you're not an hourly employee--

4           A.     It doesn't matter.

5           Q.     It doesn't matter.

6           A.     There is vacation time, which you know  
7     of, and it's according to your seniority how many  
8     days you get. There are some personal days,  
9     optional holidays. And, of course, the holidays  
10    everybody gets off at the same time.

11          Q.     Personal days, what are those?

12          A.     They are called GP days. They are  
13    like vacation days. They call them personal  
14    days. I don't know why. You get a certain amount  
15    every year. Everybody gets the same amount  
16    according to your seniority.

17          Q.     And it's used like vacation time?

18          A.     Yes, correct. There are optional  
19    holidays. It's basically the same thing. You get  
20    a certain amount according to seniority. You are  
21    paid for that. Everybody gets that.

22          Q.     Everybody, including nonmanagement and  
23    officers?

24          A.     That's correct, everybody. I'm trying  
25    to think. There is HP time, which is



1 home/personal. That's if somebody at home, your  
2 child, gets sick, or your parent is sick, your  
3 plumbing just blew up, that type of thing. There  
4 is MP time.

5 Q. With or without pay?

6 A. That is at the discretion of your  
7 supervisor. That's generally with pay.

8 Q. Are you allotted any limit?

9 A. No, there is not, but generally if you  
10 are taking a lot of HP time, you would be spoken  
11 to about it.

12 Q. But there is no formal cap?

13 A. No, there is no formal cap on it,  
14 that's correct.

15 Q. And the first you described, ET?

16 A. It's "E" time. No, that is generally  
17 up to thirty days. After that you would be  
18 expected to go on a normal leave of absence.

19 Q. Are there any others?

20 A. There is MP time, which is  
21 miscellaneous pay time. That's funerals, a death  
22 in the family, that type of thing.

23 Q. Is there any time limit to that?

24 A. No, there is not. It's the same as  
25 HP; basically, there is no cap.

1 Q. What are your responsibilities  
2 regarding this mechanized time recording?

3 A. I am the coordinator. Generally, you  
4 know, if there are any problems, if a person has a  
5 question about anything, they would come to me  
6 and I would try to resolve it for them. If I  
7 could not, I would have to go to Atlanta and talk  
8 to the people in Atlanta and get it resolved.

9 Q. Are you actually putting in the time  
10 records the hours worked by people?

11 A. I do not. Someone who works for me  
12 does that.

13 Q. For the entire company, for the three  
14 floors in this building?

15 A. No, she does that for the people who  
16 report to me, for my office. Not only for the  
17 people who report to me, but the people in my  
18 office.

19 Q. What are you referring to as "your  
20 office"?

21 A. Well, she handles it for my seven  
22 people, myself, and any management in corporate,  
23 in external affairs in the state staff office  
24 there.

25 Q. Are these people on the eighteenth and

1 twentieth floors?

2 A. That's correct.

3 We also do forecasting.

4 Q. The people on the eighteenth and  
5 twentieth floors do forecasting?

6 A. No, we also do the MTR forecasting for  
7 the forecasting folks.

8 Q. Are the forecasting people on one of  
9 these floors?

10 A. Yes, and some are in South Dade and  
11 some are in Fort Lauderdale.

12 Q. Are you doing the mechanized time  
13 recording for most of the people on the  
14 eighteenth, nineteenth, and twentieth floors?

15 A. I do not do the nineteenth floor.

16 Q. You do not do the nineteenth floor?

17 A. No.

18 And the twentieth floor, the  
19 comptrollers people, we do not handle.

20 Q. But otherwise you do--

21 A. There is a difference between -- the  
22 person who works for me does the imputing. I am  
23 the coordinator. I am not doing everyone's  
24 imputing. When they have problems, they come to  
25 me and I have to resolve them. That's the

1 nineteenth floor.

2 Q. What kind of problems do you resolve?

3 A. If an assistant has a lot of problems,  
4 any computer system that goes down, you can't put  
5 something in, the codes are popping back up, all  
6 kinds of things like that.

7 Q. Do you deal with the problem if  
8 someone is taking too much time?

9 A. That's not my responsibility.

10 Q. That's not your responsibility?

11 A. No, it is not.

12 Q. Your responsibility is primarily  
13 imputing data and seeing how it should be  
14 compiled?

15 A. For my seven people, I am responsible  
16 for them. That's my responsibility. The rest of  
17 the people, no. I am their coordinator. I send  
18 them the information, I tell them if there are  
19 updates, I keep them informed, and resolve any  
20 problems they have. I am not responsible for how  
21 they put their time.

22 Q. You have alluded to the term "our  
23 office" a number of times. What do you mean by  
24 "our office"?

25 A. I'm talking about the immediate people



1 right around the vicinity.

2 Q. What does that mean, the eighteenth  
3 floor?

4 A. No, not the entire eighteenth floor.

5 Q. How many people are on the eighteenth  
6 floor, a guesstimate?

7 A. Fifty? Forty?

8 Q. How many of them are you referring to  
9 as "our office," would you say?

10 A. I would say like maybe sixteen.

11 Q. Who does it include aside from this  
12 several people, and I assume your boss, David  
13 Seymour?

14 A. That's correct. And the corporate and  
15 external affairs state staff people.

16 Q. Are those people under David Seymour?

17 A. No, they are not.

18 Q. Explain to me who they are, corporate  
19 and external affairs.

20 A. They are public relations.

21 Q. Public relations for the entire  
22 company?

23 A. For Florida.

24 Q. For Florida?

25 A. Yes.

1 Q. But they do not report to David  
2 Seymour?

3 A. No, they report to Terry Johnson.

4 Q. Do you have responsibilities working  
5 with them? Do you do their time report?

6 A. That's correct. I do their training.

7 Q. You do their training?

8 A. Yes.

9 Q. What else?

10 A. Just minimally interact with them.

11 Q. Do you participate in any of their  
12 business in terms of work product?

13 A. The people that I supervise, support  
14 them, so that is how I interact with them.

15 Q. So they are not providing any sort of  
16 analysis, opinions, things of that nature? They  
17 are not providing management services?

18 A. My people?

19 Q. Yes.

20 A. No, they are not.

21 Q. It is all clerical support?

22 A. That's correct.

23 Q. You don't provide management or  
24 discretionary analysis?

25 A. No, I don't.

1 Q. Do you act as a personal secretary to  
2 David Seymour, or does he have a personal  
3 secretary?

4 A. No, he does not have a secretary; so  
5 pretty much, yes.

6 Q. Do you have any responsibilities for  
7 him that you haven't pretty much already  
8 described?

9 A. No, I don't.

10 Q. If he has a personal letter to go out  
11 or whatever, do you type it or have it typed for  
12 him?

13 A. I have it typed, uh-huh.

14 Q. Do you personally do his travel  
15 arrangements?

16 A. I have at times, and the people who  
17 work for me have at times, also.

18 Q. When you say you act as his personal  
19 secretary, do you delegate most of the stuff a  
20 personal secretary would do?

21 A. Pretty much, yes.

22 Q. What is the chain of command? From  
23 you it goes to David Seymour. Who is his boss?

24 A. Cort Lantaf.

25 Q. Who is Cort Lantaf?

1           A.     Cort Lantaf is the assistant vice  
2 president of corporate and external affairs.

3           Q.     I'm sorry? Assistant vice president?

4           A.     Of corporate and external affairs.

5           Q.     Are you considered part of corporate  
6 and external affairs?

7           A.     Well, I would say no. Officially, no.  
8 We are all under the same department, Cort's  
9 title.

10          Q.     What is that?

11          A.     It's considered the executive  
12 department.

13          Q.     You are under the executive department  
14 and so corporate and external affairs?

15          A.     Yes, it falls under that.

16          Q.     It falls under that?

17          A.     Yes. Forecasting does. Industry  
18 relations does. Pioneers do. The general  
19 assistance bureau does. All of that.

20                   (Thereupon, Ms. Green enters the  
21 deposition room.)

22                   MS. GREEN: I am Angela Green. I  
23 represent the commission staff.

24                   MR. CURINGTON: I am Jerry Curington  
25 with the Attorney General's Office.



1 MR. SALE: I am John Sale, along with  
2 my associate, Mr. Kuehne.

3 MS. MILTON: I am Ms. Milton.

4 MR. ANTHONY: I am Mr. Anthony.

5 BY MR. CURINGTON:

6 Q. Do you have a corporate organizational  
7 chart?

8 A. Do you mean one big chart with  
9 everybody on it?

10 Q. A diagram with everyone, who reports  
11 to whom.

12 A. I don't think so. I don't think they  
13 did one recently.

14 Q. Have you ever seen one?

15 A. Way back, but there have been so many  
16 changes.

17 Q. Changes in people or changes in  
18 structure?

19 A. Changes in structure, people,  
20 everything.

21 Q. Who does Cort Lantaf report to?

22 A. Joseph Lacher.

23 Q. Who is he?

24 A. The president of Florida.

25 Q. Of Southern Bell?

1 A. Southern Bell Florida.

2 Q. Southern Bell Florida?

3 A. Yes.

4 Q. Could you very briefly explain to me  
5 the corporate structure? Is Southern Bell of  
6 Florida a corporate and independent corporation?

7 MR. KUEHNE: If you know.

8 THE WITNESS: I don't know.

9 BY MR. CURINGTON:

10 Q. Do you know if it has a parent  
11 company?

12 A. Bell South is the parent company.

13 Q. Bell South is the parent company?

14 A. Yes.

15 Q. Who does Joe Lacher report to then?

16 A. Joe Lacher.

17 Q. Joe Lacher, I'm sorry.

18 A. Right now I couldn't tell you.

19 MR. CURINGTON: We're going to get to  
20 a somewhat tedious task.

21 THE WITNESS: Okay.

22 MR. CURINGTON: Let's go off the  
23 record for a second.

24 (Discussion held off the record)

25 MR. CURINGTON: Back on the record.

1 BY MR. CURINGTON:

2 Q. For the time being, we're referring to  
3 documents I think that are produced from your  
4 permanent file.

5 A. Okay.

6 Q. I just want to identify this as  
7 Document A. It reflects you were a secretary in  
8 November of '79.

9 A. That is an individual record of the  
10 hours worked in higher rated jobs, if you relieve  
11 someone on a higher related job. In other words,  
12 if an assistant manager is not in the office and I  
13 do their job for two weeks, it would go on here  
14 saying I relieved at a higher rated job.

15 Q. That would be in here?

16 A. That would be the 22 and 1/2 hours. I  
17 relieved someone for 22 and 1/2 hours. I did  
18 their job while they were gone for whatever  
19 reason.

20 Q. Would this have been when you were in  
21 the mail room or were you the secretarial  
22 stenographer at that time?

23 A. I probably was the secretarial  
24 stenographer.

25 Q. And you were filling in for a

1 secretary who was in a higher position?

2 A. That is correct.

3 Q. There is clearly a class for  
4 secretary? There is a job description called  
5 "secretary."

6 A. Sure. There is more than one, I am  
7 sure.

8 Q. I note that you have taken various  
9 courses at the community college and so on.

10 A. Right.

11 Q. Are those courses paid for by the  
12 company?

13 A. Yes, they are. The tuition, not  
14 anything else.

15 Q. Is the tuition available to all  
16 company employees or only management?

17 A. Yes, all company employees.

18 Q. Is there a limit to that?

19 A. I believe there is. I don't know what  
20 it is. It's a dollar limit every year.

21 Q. Are you allowed to take any course or  
22 is there some judgment that a course has to  
23 advance the company's interests?

24 A. It has to either be in the company's  
25 interest or working toward a degree. It could be



1 a course not directly related to the company, but  
2 directly related to a degree that would be of  
3 benefit to you in the company.

4 Q. But they would state some degrees are  
5 beneficial and some are not, but any degree?

6 A. No, I doubt whether they would pay for  
7 a medical degree.

8 Q. Were you working for a degree at this  
9 time? This would have been in '74.

10 A. I'm sure that was the general purpose,  
11 yes.

12 Q. It was a degree the company decided  
13 was in the company's interest to pay the tuition  
14 for?

15 A. Sure.

16 MR. CURINGTON: That will be Document  
17 B.

18 BY MR. CURINGTON:

19 Q. Document C refers to transportation  
20 training.

21 A. That's driver's training, safe  
22 driver's training.

23 Q. That is what it looks like to me.  
24 Who takes it and why?

25 A. Anybody who drives a company car is to

1 have safe driving training.

2 Q. Do you drive a company car?

3 A. Very rarely.

4 Q. Have you on occasion?

5 A. On occasion.

6 Q. For what purpose?

7 A. Any time you go to a meeting in  
8 another building, you are to take a company car.

9 Q. Locally?

10 A. That's correct.

11 Q. Have you ever driven a company car out  
12 of town?

13 A. Not that I can think of, no.

14 Q. Are you given possession of any  
15 company credit card, phone card, credit card?

16 .. No, I do not have any of those. When  
17 you drive a company car, there is a gas card  
18 assigned to that car, but not to a person.

19 Q. You don't walk around with some sort  
20 of company credit card in your purse?

21 A. I don't have a company credit card,  
22 that is correct.

23 Q. Document D says you have carefully  
24 read a booklet called "A Personal  
25 Responsibility"?

1 A. That's correct.

2 Q. I note that there are a few of them.  
3 Apparently you are periodically asked to review  
4 that and acknowledge that you've read it?

5 A. Yes.

6 Q. You have done so? You have read this  
7 pamphlet or booklet?

8 A. Yes, I have.

9 Q. A number of times, I take it?

10 A. Yes, I have.

11 Q. Every few years?

12 A. It depends on how sporadic.

13 Q. And you read it again on November 4,  
14 1992?

15 A. That's correct.

16 Q. Is there anything that prompted your  
17 reading of this document at that time?

18 A. The company, the personnel people,  
19 every once in a while tell you when everybody has  
20 to read it and sign it, and it is put in the  
21 personnel record. It's a mass thing.

22 Q. That was the case here?

23 A. That is correct.

24 Q. Document E is a questionnaire on  
25 conflict of interest.

1 MR. KUEHNE: Is that the one dated in  
2 1988?

3 MR. CURINGTON: Yes, 10/6/88.

4 MR. KUEHNE: You're making that No. E?

5 MR. CURINGTON: Yes.

6 BY MR. CURINGTON:

7 Q. Are you familiar with the company's  
8 conflict of interest policy?

9 A. Yes.

10 Q. The company prohibits the acceptance  
11 of gifts of loans from companies which you do  
12 business with?

13 A. That's correct.

14 Q. With which Southern Bell does  
15 business?

16 A. Yes.

17 Q. You are charged with keeping  
18 confidential private company information?

19 A. That's correct.

20 Q. Is the work that you did in the  
21 revenue forecasting considered private company  
22 information?

23 A. I'm sure it is.

24 Q. You would not be at liberty to share  
25 that with the competition or people outside the



1 company?

2 A. No, I don't think you should.

3 Q. Were you ever instructed when in  
4 revenue forecasting not to divulge that  
5 information?

6 A. I don't really remember specifically,  
7 but, in general, I think it's understood you  
8 don't divulge company information.

9 Q. Again, I am taking it out of context.  
10 I don't mean to trick you.

11 Here, read with me.

12 "The policy also provides for" -- if  
13 you will read the sentence to me.

14 A. "Also provides for disclosure by  
15 employees of any situation, activity, or  
16 relationship that is or may appear to be in  
17 violation of the principle."

18 Q. Let me digress for a minute.

19 I understand you were dating  
20 Commissioner Thomas Beard of the Public Service  
21 Commission; is that correct?

22 A. That's correct, yes.

23 Q. Do you consider this policy to affect  
24 that dating relationship?

25 A. I do not.

1 Q. Did you disclose to any of your  
2 supervisors that you were dating Commissioner  
3 Beard?

4 A. At some point -- I believe it was late  
5 November -- Tom Beard spoke with Joe Lacher about  
6 our dating relationship.

7 Q. Did you speak with anyone in your  
8 department or company?

9 A. After that I spoke with Hank Anthony.

10 Q. And disclosed you were dating  
11 Commissioner Beard?

12 A. Joe Lacher had already told Hank  
13 Anthony.

14 Q. You also told Mr. Anthony?

15 A. Yes. He and I talked about it at that  
16 point.

17 Q. Did he give you any advice as to what  
18 you could or could not do in that relationship in  
19 terms of what you could talk about or what you  
20 could communicate regarding certain subjects?

21 MR. SALE: Excuse me.

22 Without any broad waiver of any  
23 attorney/client privilege, we will not object to  
24 her answering any questions as long as it's not  
25 construed as a waiver of the attorney/client

1 privilege. In this area we have no problem.

2 MS. MILTON: We will reserve the same  
3 objection and comment on behalf of Southern Bell,  
4 as well. Her testimony is not any broad waiver of  
5 any attorney/client privilege.

6 BY MR. CURINGTON:

7 Q. Let me clarify.

8 You are appearing here today  
9 individually?

10 A. Right.

11 MR. CURINGTON: Mr. Sale, you  
12 represent her individually?

13 THE WITNESS: That's right.

14 MR. SALE: That's right.

15 MR. CURINGTON: Ms. Milton, you are  
16 representing Southern Bell today?

17 MS. MILTON: That is correct.

18 MR. CURINGTON: Mr. Anthony?

19 MR. ANTHONY: Southern Bell.

20 BY MR. CURINGTON:

21 Q. Have you retained Mr. Sale?

22 A. Yes, I have.

23 Q. Personally you have retained him, or  
24 has the company retained him for you?

25 MR. SALE: I think we are going to

1 Q. Did you get into any specifics about  
2 what you could or could not talk about, for  
3 example?

4 A. I don't remember specifically, but I  
5 understood I should not be discussing Southern  
6 Bell, period.

7 Q. But did Mr. Anthony ever say, "You can  
8 never discuss Southern Bell's business with Mr.  
9 Beard," or something to that effect?

10 A. I would assume he said something to  
11 that effect. I really cannot remember  
12 specifically. That was in November of '92.

13 Q. You said you were generally already  
14 aware of that notion. How were you aware?

15 A. I think hopefully ever employee is  
16 aware as part of their employment that you do not  
17 disclose company business to anyone.

18 Q. Are you familiar with any of the  
19 regulatory provisions that prohibit public  
20 commissioners from speaking with companies which  
21 have matters pending before them?

22 MR. ANTHONY: I'm sorry, I am not  
23 aware of any such provisions. Can you specify of  
24 which provision you are aware?

25 MR. CURINGTON: It's a provision where



1 a PSC commissioner is not allowed to speak to  
2 company officials when there is a matter pending  
3 before the PSC.

4 I may have to ask Charlie for some  
5 help here, but I think I can.

6 350.042, ex parte communications. Are  
7 you familiar with that?

8 MR. ANTHONY: Yes, sir, but I don't  
9 believe it says what your question asks.

10 BY MR. CURINGTON:

11 Q. Are you personally aware of any  
12 regulatory provisions that in any way address  
13 whether and how you can communicate with  
14 commissioners with the PSC if there is a Southern  
15 Bell matter pending in front of them?

16 A. I have no idea.

17 Q. Your lawyers never sat down and talked  
18 with you about Chapter 350, for example?

19 MR. SALE: I object to that in terms  
20 of what she discussed with her lawyers. It can  
21 mean anything beyond that discussion that she  
22 already testified about.

23 BY MR. CURINGTON:

24 Q. Did Mr. Anthony ever advise you about  
25 Chapter 350?

1 A. No.

2 Q. Has anybody from the company?

3 A. No.

4 Q. But your general instinct or common  
5 sense told you you should not talk about company  
6 business?

7 A. It's not general instinct only. In  
8 the company we have been taught -- every employee  
9 has been -- that we do not disclose company  
10 information to anyone. That is just standard  
11 operating procedure.

12 Q. Is that something that every  
13 employee--

14 UNIDENTIFIED WOMAN AT DOOR: May I see  
15 you for a minute? It's urgent.

16 (Brief recess taken)

17 (Thereupon, the preceding question and  
18 answer were read back by the court reporter.)

19 BY MR. CURINGTON:

20 Q. --is advised?

21 A. Yes.

22 Q. And would you apply that standard  
23 whether it was a PSC commissioner or just anyone  
24 on the street?

25 A. That's correct.

1 Q. Document F is captioned "Bell South  
2 Corporation, Notice to Employees Regarding  
3 Proprietary Information."

4 MR. KUEHNE: Is that the one dated  
5 August of 1984?

6 THE WITNESS: Yes.

7 MR. CURINGTON: Yes.

8 BY MR. CURINGTON:

9 Q. This document generally discusses that  
10 issue about not disclosing company information;  
11 is that correct?

12 A. Yes.

13 Q. That would be true of any information,  
14 but it also highlights things such as marketing  
15 research study data?

16 A. Yes.

17 Q. Is your regular forecasting part of  
18 that?

19 A. Marketing research is different.

20 Q. How so? What is marketing research  
21 data?

22 A. I imagine marketing does their own  
23 research product related. I really don't know.  
24 I'm not very familiar with their reports.

25 Q. What about marketing position, would

1       that be part of the revenue projections?

2           A.     No.

3           Q.     What about customer training and usage  
4       data?

5           A.     No.

6           Q.     How do you arrive at revenue  
7       forecasting if you don't look at things like  
8       usage data, quantity of service?

9           A.     Well, frankly, I don't arrive at  
10       forecasting analysis, I just input it into the  
11       computer. I don't think I can tell you how they  
12       arrive at that.

13          Q.     This is a medical document.

14          A.     That's the insurance paper.

15               MR. ANTHONY: May I see it?

16               MR. CURINGTON: Believe me, we don't  
17       want to invade anything personal. We do it  
18       strictly inadvertently.

19               MR. KUEHNE: The only area we are  
20       concerned about putting into public record is any  
21       information that is familiarly related. There is  
22       a portion that talks about dependents. We do not  
23       believe Alma's dependent is at all a necessary  
24       issue in this case. That would be 6H.

25               MR. CURINGTON: Well, let's address



1       that for a minute. There will be a point in time  
2       when we are talking about her travel and to the  
3       extent of how that travel is arranged, who is  
4       paying for it, who is accompanying her.

5               I take it if she has a dependent,  
6       whether the dependent accompanied her, we will  
7       ask those kinds of questions.

8               MR. KUEHNE: For example, this  
9       identifies her dependent by name and includes the  
10      Social Security number, date of birth, and other  
11      identifying information which is in no way public  
12      information. In fact, that's the most  
13      confidential information of sorts.

14              MR. CURINGTON: We're not interested  
15      in the Social Security number.

16              Can we establish on the record she has  
17      a dependent?

18              MR. KUEHNE: Sure.

19      BY MR. CURINGTON:

20              Q.     From this I garnered, at the time of  
21      this, at least -- I am having a hard time figuring  
22      out what the date is -- on March 15 of '88 you  
23      were married and you have a dependent daughter.

24              A.     I was not married in 1988, but I do  
25      have a dependent daughter. I was divorced.

1 Q. There is a typo here, it appears.

2 A. Yes.

3 Q. But you have a daughter?

4 A. Yes, I do.

5 Q. Again, this is another medical maybe  
6 where there was leave, extended leave.

7 A. That's when I had jaw surgery. I had  
8 double jaw surgery in 1984.

9 Q. A TMJ, one of those?

10 A. Something along those lines.

11 MR. SALE: One second.

12 MR. KUEHNE: One second.

13 (Discussion held between Mr. Sale and  
14 Kuehne outside the hearing of the court  
15 reporter.)

16 MR. SALE: We have no problem.

17 If you are asking any questions  
18 referring to it, just mark it and you will know  
19 what we are talking about.

20 MR. CURINGTON: I will mark it since I  
21 am asking the question.

22 We are on G then.

23 BY MR. CURINGTON:

24 Q. From this document it appears from  
25 August 27 of '84 to October of 11 of '84 you were

1 on leave.

2 A. It was medical benefits.

3 Q. Again, under this situation, for  
4 example, is your pay docked?

5 A. No, it is not.

6 Q. I'm going to move now to your more  
7 recent performance evaluations. I am looking at  
8 the one covering the period of January 1 of '92  
9 through 12/31 of '92. Your position is titled  
10 "staff assistant." Your supervisor is Victor --  
11 help me.

12 A. Beninate.

13 Q. I take it from this that David Seymour  
14 only became your supervisor since January of  
15 1993?

16 A. That's probably accurate, yes.

17 Q. What is the responsibility of your  
18 immediate boss? What is his program  
19 responsibility or objective or goal?

20 A. You're talking about Vic Beninate or  
21 David Seymour?

22 Q. They would be the same, that position?

23 A. No, their jobs have changed somewhat.

24 Q. The current one, David Seymour.

25 A. He is supervisor over forecasting,

1 industry relations, and the Pioneers.

2 Q. What is the Pioneers?

3 A. The Pioneers are a community  
4 organization that do a lot of voluntary work.

5 Q. He is responsible for getting revenue  
6 forecasting data together?

7 A. Right.

8 Q. What does he do in the other two  
9 roles?

10 A. He just supervises the Pioneers, which  
11 handles community work, and industry relations is  
12 they work with independent companies, other  
13 telephone companies, Florida telephone companies.

14 Q. It's the competition that he  
15 coordinates or communicates with?

16 A. I don't know exactly what they do,  
17 but, yes, that is correct.

18 Q. Other telephone companies?

19 A. Yes.

20 Q. He is responsible for communications  
21 throughout the state?

22 A. Yes.

23 Q. Do the people at -- I have notes here  
24 corporate and external affairs--

25 A. Correct.



1 Q. --report to him?

2 A. They do not.

3 Q. Does he report to them?

4 A. No, he does not.

5 Q. You have already generally summarized  
6 what your job duties are. They appear to be quite  
7 consistent with what is in this job description.  
8 Is there anything that comes to mind that is not  
9 described in terms of your job description?

10 A. Not that I can think of.

11 MR. KUEHNE: That document you have  
12 noted is letter H?

13 MR. CURINGTON: Yes.

14 BY MR. CURINGTON:

15 Q. It again talks about making travel  
16 arrangements. Are those travel arrangements only  
17 for the training seminars you put on or do you  
18 make training arrangements for other purposes?

19 A. This is just a very general document.  
20 It is used for all these people at these pay  
21 rates. This applies to everybody.

22 MR. SALE: When you say "all these"--

23 THE WITNESS: Okay, pay rate A1, AX,  
24 AY, and AZ. This applies to all those people.

25 Anybody in these pay rates uses this form. It's a

1 general form that doesn't specifically apply to  
2 every person the same way.

3 BY MR. CURINGTON:

4 Q. This job description says "includes  
5 responsibilities dealing with customers' calls  
6 and also dealing with corporate and external  
7 affairs."

8 A. Right.

9 Q. Your support staff are doing the day-  
10 to-day answering of the phones for corporate  
11 affairs, are they?

12 A. Yes, they are.

13 Q. They are?

14 A. Yes, they do.

15 Q. Your seven clerical people basically  
16 answer the phones for--

17 A. That's correct, corporate affairs.

18 Q. Does corporate and external affairs  
19 have anything to do or does it ever interact with  
20 the Public Service Commission?

21 A. Not that I can think of, no.

22 Q. Do you know what department in the  
23 company or what division does interact with the  
24 Public Service Commission?

25 A. Regulatory regulations.

1 Q. Is that a division, a department?  
2 What is it called?

3 A. I guess it's like a division or a  
4 department.

5 Q. And you are rated outstanding?

6 A. Yes.

7 Q. I am referring just to an earlier  
8 evaluation.

9 A. Yes.

10 Q. Can you explain these initials to me  
11 on the promoting rating?

12 A. Promotability rating.

13 Q. What is CG?

14 A. That means you are promotable. CG is  
15 maybe considered as a candidate for promotion to  
16 any pay grade one through three, general  
17 management or sales position. The other one, CW,  
18 may be considered as a candidate for promotion in  
19 the secretarial hierarchy. I guess that's what  
20 that means. What that is saying is I am  
21 considered promotable to any of those categories.

22 Q. I notice the CG is the one checked  
23 off.

24 A. Right. That means I may be considered  
25 as a candidate for promotion to both of those

1 categories. Instead of singling me out, I am  
2 promotable for both.

3 Q. This is 1992. Have you been promoted  
4 to CG or CB?

5 A. No, it just means you need that rating  
6 in order to be promoted.

7 Q. Are you still a candidate for that--

8 A. Sure.

9 Q. --even though I don't recall that box  
10 being checked in for recent evaluation?

11 A. If it doesn't change, your performance  
12 has to be rated every year. As long as your  
13 supervisor doesn't want to change it, it's not  
14 done again.

15 Q. Today you are considered a candidate  
16 for promotion to both of those positions, CW and  
17 CG?

18 A. That is correct.

19 MR. KUEHNE: You were considered a  
20 candidate for promotion to both of those  
21 positions, CW and CB?

22 THE WITNESS: That is correct.

23 MR. KUEHNE: Did you want to make that  
24 as No. I, the 6/1/89 to 12/31/89 performance  
25 review?



1 MR. CURINGTON: Let's do it. It is I.

2 BY MR. CURINGTON:

3 Q. I would like to direct your attention  
4 to what I have marked as J for the time being, a  
5 performance evaluation for January 10 of '86. It  
6 says there under your job duties that you assist  
7 in the preparation of book and billed revenue  
8 forecasts, you gather data from various revenue  
9 reports, and input data in the FDMS data system;  
10 prepares revenue reports and other miscellaneous  
11 reports. And in parentheses it says, "RES.  
12 Extend, rate case time."

13 What does "rate case time," mean?

14 A. I have no idea.

15 Q. Were you new to the job at that time?

16 A. I came into that job I believe in '84  
17 when I started doing revenue reports.

18 Q. Does this trigger your memory as to  
19 whether or not that forecast data was used by what  
20 you call the regulatory division?

21 A. Right.

22 Q. Whether they used that in cases before  
23 the PSC?

24 A. I have no idea.

25 Q. You were never personally involved in

1 getting materials together to submit to the PSC?

2 A. No, I was not.

3 Q. We are going to move on from your  
4 personal file.

5 I would now like to direct your  
6 attention to some phone bills that were provided  
7 to us by the company and ask you some preparatory  
8 questions.

9 In your job you have occasion to  
10 personally call Tallahassee?

11 A. Absolutely.

12 Q. You do?

13 A. Yes.

14 Q. For what purposes do you call  
15 Tallahassee?

16 A. I call Tallahassee because I am the  
17 training coordinator, because I am their MTR  
18 coordinator.

19 Q. When you say "their," whom are you  
20 referring to?

21 A. I could call anybody in the regulatory  
22 public affairs office.

23 Q. Of Southern Bell?

24 A. That is correct.

25 Q. What are the offices called then?

1           A.     Regulatory relations and public  
2     affairs.

3           Q.     Would you call them to arrange  
4     training and so on?

5           A.     That's correct, or to resolve problems  
6     with them for the MTR.

7           Q.     Problems dealing with MTR, in other  
8     words, time problems that you had in your office  
9     and you were consulting them to get help?

10          A.     No, they are asking me for help. I  
11     help them and I have to give them information. I  
12     am their coordinator. Any new updates, new  
13     information, I have to give them. And also any  
14     time they have a problem, they have to call me and  
15     get the problem resolved. I am not responsible  
16     for their time reporting, actually, I am  
17     responsible for resolving any problems they have  
18     with the system.

19          Q.     This system, meaning imputing  
20     information, anything of that nature?

21          A.     Yes.

22          Q.     Are you the company expert for those  
23     things? Do other people consult you on that?

24          A.     No, I'm not the company expert. I am  
25     for the department.

1 Q. For your department, though, for  
2 regulatory relations within your department?

3 A. They fall under that umbrella, the  
4 executive department.

5 Q. So for that department, the executive  
6 department, you assist anyone statewide?

7 A. In the executive department, yes, that  
8 is correct.

9 Q. Do you have people statewide in the  
10 executive department outside of Tallahassee or  
11 Miami?

12 A. Oh, sure; Orlando, West Palm Beach,  
13 Jacksonville, Gainesville.

14 Q. You would deal with them if they had  
15 problems with the MTR?

16 A. Absolutely, uh-huh.

17 Q. What other reasons would you call them  
18 besides for training and MTR problems?

19 A. It could just be all kinds of reasons  
20 that I can't think of right now. I can give you  
21 an example. One of the guys in Tallahassee is up  
22 there now in forecasting. He recently got  
23 transferred up there and was supposed to turn in a  
24 company car and had not turned it in yet. I was  
25 given the task of finding out where the car was,



1        why he had not turned it in, and what the deal is  
2        going to be. Those things come up all the time.

3            Q.     Did you ever have an occasion to talk  
4        with the regulatory relations people about  
5        substantive matters regarding their job  
6        responsibilities?

7            A.     Absolutely not.

8            Q.     Have you ever had an occasion to call  
9        PSC, its staff, the public counsel's office?

10          A.     No, I do not deal with them at all.

11          Q.     Do you recall any of the phone numbers  
12       that you call routinely?

13          A.     I call a lot of numbers.

14          Q.     Hopefully, to save some time here, let  
15       me ask if you if you recognize any of these phone  
16       numbers, if you can read my writing.

17          A.     Okay.

18          Q.     Let me ask you to start by looking at  
19       the ones with asterisks, state phone numbers with  
20       the 488 exchange. Do you recognize 488-0733?

21          A.     I do not.

22          Q.     Do you recognize 488-1573?

23          A.     No.

24                    Let me ask you something.

25                    Those are the lines for everybody in

1 the office. Those are not my lines.

2 Q. Let me clarify that.

3 Looking at these phone records,  
4 generally what lines to they cover and how many  
5 exchanges or how many extensions?

6 A. In my office there are probably thirty  
7 phone lines that belong to different people.

8 Q. In your office, you're talking about  
9 the eighteenth floor?

10 A. Yes.

11 Q. Part of the eighteenth floor?

12 A. That's correct.

13 Q. Not all fifty people?

14 A. That is correct.

15 The numbers that are shown on my phone  
16 are a lot of people's lines. All those bills were  
17 pulled. Here, 5403, is David Seymour.

18 Q. Are they on a rotary? You say thirty  
19 phone lines, approximately?

20 A. Some of them are and some of them  
21 aren't.

22 Q. But you or other people in your office  
23 have access to these numbers?

24 A. All these lines, that is correct.

25 Q. You can stand at someone else's desk

1 and call out?

2 A. And they can stand at mine, that is  
3 correct.

4 Q. I recognize from these phone records  
5 that doesn't mean you made the phone calls.

6 Do you recognize 488-1573?

7 A. No, I do not.

8 Q. Do you recognize 448-5573?

9 A. No, I do not.

10 Q. Do you recognize 448-1234?

11 A. No, I do not.

12 Q. I think those are the only state  
13 exchanges.

14 Are there any numbers on that list  
15 that you do recognize?

16 A. Sure. I recognize 234-5244, 234-6167.

17 Q. The ones you recognize, would you  
18 identify them again?

19 A. 224-5244.

20 Q. What number is that?

21 A. That's regulatory relations.

22 Q. And the next one?

23 A. 224-6167.

24 Q. That is what?

25 A. Also REG relations.

1 1201 I recognize.

2 Q. What is that?

3 A. I am not sure. That's either public  
4 affairs or either REG relations, one of the two.  
5 That's it.

6 Q. Those are the only numbers you  
7 recognize?

8 A. Yes.

9 Q. Thank you.  
10 These temporarily will save a lot of  
11 time.

12 I now want to direct your attention to  
13 your personal relationship with Commissioner  
14 Beard. Can you tell us when you first met  
15 Commission Beard?

16 A. I met Commissioner Beard, I believe it  
17 was May 30th of 1992.

18 Q. Where?

19 A. I met him at the Ocean Reef Club in  
20 Key Largo, Florida.

21 Q. Who introduced you?

22 A. He was sitting with a group of people.  
23 I walked up with Elise. I don't know who  
24 introduced us. Someone introduced us around.

25 Q. You walked up with Elise who?



- 1           A.     Nivica, N-i-v-i-c-a.
- 2           Q.     The two of you walked up. Where were  
3 you, at poolside, the restaurant?
- 4           A.     It was poolside.
- 5           Q.     This was a social time, people weren't  
6 there discussing business at the time?
- 7           A.     That is correct.
- 8           Q.     Who was in the group that you walked  
9 up to?
- 10          A.     Tony Lombardo, his wife Barbara, Tom  
11 Beard -- there were others there, but I really  
12 don't recollect who they were.
- 13          Q.     Do you recall if Tony Lombardo is the  
14 one who introduced you?
- 15          A.     I don't recall that specifically, no.
- 16          Q.     Excuse my informality by using first  
17 names.
- 18          A.     That's okay.
- 19          Q.     Elise was there?
- 20          A.     Yes.
- 21          Q.     Was she also introduced at that time  
22 to Commissioner Beard?
- 23          A.     To the group.
- 24          Q.     Were there personal introductions  
25 where everybody's name was given?

1 A. Sure.

2 Q. Is there anybody else that you can  
3 recall being present?

4 A. I know there were other people  
5 present, but I do not know who they are.

6 Q. People you didn't work with?

7 A. That is correct.

8 Q. PSC officials, do you know?

9 A. I don't believe so. I really don't  
10 know for sure.

11 Q. Were there other Southern Bell  
12 employees there?

13 A. No, not that I remember, no.

14 Q. Do you know if they were social  
15 friends of the Lombardos?

16 A. I have no idea.

17 Q. What was the function you were  
18 attending?

19 A. I was at a Florida Telephone  
20 Association annual convention.

21 Q. Why were you there?

22 A. I was a guest of Elise.

23 Q. Were you considered on duty?

24 A. No, I was not.

25 Q. This was personal time?

- 1 A. It was personal time.
- 2 Q. Who paid for your transportation?
- 3 A. I did.
- 4 Q. Did you stay down there?
- 5 A. Yes.
- 6 Q. How long were you down at the Ocean  
7 Reef?
- 8 A. I believe I was there Saturday night  
9 and Sunday night.
- 10 Q. You paid for your own accommodations?
- 11 A. I slept in Elise's room.
- 12 Q. She paid for the room?
- 13 A. I have no idea. I was in her room. I  
14 have no idea who paid for the room.
- 15 Q. How did you get down there?
- 16 A. I drove my car.
- 17 Q. Did she drive with you?
- 18 A. No, she did not. She was there  
19 already.
- 20 Q. Were you reimbursed for any expenses  
21 by the company?
- 22 A. No, I was not.
- 23 Q. Were you reimbursed by anyone?
- 24 A. No, I was not.
- 25 Q. You paid for your own meals?

1           A.     I can't say. Elise and I probably  
2     went back and forth paying for things. I do not  
3     remember.

4           Q.     Were you going to restaurants or were  
5     they having banquets and things where meals were  
6     provided?

7           A.     Well, we ate at restaurants, and there  
8     were dinners that were banquets.

9           Q.     You were invited to those dinners and  
10    you participated?

11          A.     Uh-huh.

12          Q.     Who sponsored those banquets or  
13    dinners?

14          A.     I do not have any idea.

15          Q.     The Florida Telephone Association I  
16    assume includes a majority of telephone companies  
17    that operate in Florida?

18          A.     I would say that's a safe assumption.

19          Q.     They were in attendance?

20          A.     There were a lot of people there, yes.

21          Q.     From other phone companies?

22          A.     Uh-huh.

23          Q.     Do you recall meeting people from  
24    other phone companies?

25          A.     I met a lot of people. I really don't



1 recall.

2 Q. But during your meeting with Mr.  
3 Beard, Commissioner Beard--

4 A. I am not sure exactly what you are  
5 asking.

6 Q. When first introduced to Commissioner  
7 Beard, do you recall whether the president of  
8 Sentel was there or anybody else?

9 A. There were a number of people there.  
10 I do not recall who they were.

11 Q. Was this the first convention of this  
12 nature you had attended?

13 A. That I can think of, yes.

14 Q. Had you ever traveled out of state on  
15 business for Southern Bell up to this point?

16 A. Yes, I had.

17 Q. When did you travel out of state for  
18 Southern Bell?

19 A. I had been to Birmingham twice.

20 Q. Was that before this?

21 A. No, it was after that.

22 Q. Have you ever traveled anywhere  
23 outside the state on behalf of Southern Bell?

24 A. No.

25 Q. Just the two visits to Birmingham?

1 A. That's correct.

2 Q. Do you recall the approximate dates?

3 A. One was in late July and the other  
4 one--

5 Q. Of '92?

6 A. Yes, that's correct.

7 Q. Shortly after that?

8 A. Correct.

9 And the other one I don't recall. It  
10 was in '92 at some point. I don't remember when.

11 Q. When you met Commissioner Beard, you  
12 were at the Ocean Reef Club poolside?

13 A. Yes.

14 Q. Would this have been on Friday,  
15 Saturday, or Sunday?

16 A. I believe that was Friday.

17 Q. You believe it was May 30th?

18 A. I believe so, uh-huh.

19 Q. It was in a social context?

20 A. That's correct.

21 Q. Everyone, I presume, was casual at  
22 poolside in swimming suits and things?

23 A. Yes, that is correct.

24 Q. Did you then socialize at all with  
25 Commissioner Beard that weekend?

1           A.     Well, he was around.  Other people  
2     were around, also.

3           Q.     Did you sit at the dinner table with  
4     him, for example?

5           A.     I had dinner with him one night, yes.

6           Q.     Do you recall what night that was?

7           A.     I believe it was Saturday night.

8           Q.     The day you met?

9           A.     Yes.

10          Q.     I presume at the table with other  
11     people?

12          A.     Yes.

13          Q.     Do you recall who else was at the  
14     table?

15          A.     I know Tony Lombardo was there and  
16     Barbara, his wife.  Elise was there.  I really  
17     don't recall who else.

18          Q.     In your mind at this point, this was  
19     not a date?

20          A.     Absolutely not.

21          Q.     Just sharing a table?

22          A.     Sure.

23          Q.     What was the nature of the  
24     conversation at that dinner table?

25          A.     I could not tell you specifically, but

1 it was social conversation.

2 Q. Strictly social?

3 A. Strictly social.

4 Q. No convention business?

5 A. Not that I can recall, no.

6 Q. And no Southern Bell business that you  
7 recall?

8 A. Not that I can recall, no.

9 Q. What about conversations at poolside  
10 when you were introduced?

11 A. No, that was very casual social  
12 conversation,

13 Q. Did you do anything else in the  
14 company of Commissioner Beard on that weekend?

15 A. Not that I can remember specifically.  
16 I know one night we were having drinks in the bar.  
17 Elise and I were in the bar. He came in. A group  
18 of people came in, maybe twenty people. He was  
19 there.

20 Q. Would that have been Saturday night?

21 A. I don't think so. I really can't  
22 recall. It may have been Sunday night.

23 Q. Would the bar have been open Sunday  
24 night?

25 A. It was open.



1 Q. Was it a bar separate from the  
2 restaurant?

3 A. It was separate from the restaurant,  
4 yes.

5 Q. Did he come up and speak to you in the  
6 bar?

7 A. Maybe very briefly.

8 Q. Did he speak with Elise?

9 A. I didn't see him speak with her, that  
10 I recollect. Everybody was talking to everybody.

11 Q. Do you know if he and Elise knew each  
12 other before that?

13 A. I believe Elise knew who he was. I  
14 don't believe that she knew him well.

15 Q. Going back to the poolside for a  
16 minute, was it apparent that Mr. Lombardo or  
17 Commissioner Beard knew each other already?

18 A. It looked like that everybody knew  
19 each other. Everybody was just chatting.

20 Q. Were they introduced as friends?

21 A. I had no idea who he was at this  
22 point.

23 Q. No one gave you information?

24 A. No. They said, "This is Tom Beard."

25 Q. Did Tom Beard have anybody with him?

1 A. Not that I recall.

2 Q. It didn't look like he had a date?

3 A. No.

4 Q. During your dinner conversation or  
5 anything did any conversation come out about how  
6 long Mr. Lombardo had known Commissioner Beard or  
7 anything of that nature?

8 A. Not that I can recollect. To be  
9 honest with you, I have a hard time recalling a  
10 conversation from a year and a half ago.

11 Q. I appreciate that.

12 Do you recall formulating any sort of  
13 a concept of whether or not these people were old  
14 friends or newly acquainted?

15 A. No, not really.

16 Q. When did you next either see or speak  
17 to Commissioner Beard?

18 A. That's hard to say. I mean, I know it  
19 was at some point after that by telephone.

20 Q. The next communication was by  
21 telephone?

22 A. I think so, yes.

23 Q. Can you describe the circumstances?

24 A. The circumstances were personal.

25 Q. Did he call you?

1           A.     Yes, he did.

2           Q.     Was it for purposes of going out,  
3     having a date?

4           A.     It was for personal purposes of  
5     getting to know me better, sure.

6           Q.     Did he call you from Tallahassee?

7           A.     I have no idea.

8           Q.     Was he in Miami?

9           A.     No, he was not in Miami, but I don't  
10    know where he was at. I don't remember him  
11    saying, "Hi, I'm in Tallahassee."

12          Q.     Did he say, "Hi, I am in town; can you  
13    join me for dinner"?

14          A.     No, he did not. He was not in town.

15          Q.     Approximately how long did you talk to  
16    him during that conversation?

17          A.     Oh, gosh, I have no earthly idea.

18          Q.     Did you agree to see him socially?

19          A.     Well, at that point we were just  
20    getting to know each other. I don't think there  
21    was any agreement of any kind.

22          Q.     Did he ask you to go out to dinner?  
23    Did he ask you to come by to visit?

24          A.     He said he would like to see me again.  
25    We were five hundred miles apart. It's

1       difficult.

2               Q.     But no specifics were discussed?

3               A.     No specifics that I can remember.

4               Q.     You don't remember setting up a first  
5       date or anything?

6               A.     No, I do not.

7               Q.     When do you next recall speaking with  
8       him or seeing him?

9               A.     I saw him at some point in June. I  
10       believe it was at some point in June I went up to  
11       Tallahassee for the weekend.

12              Q.     Let me digress.

13                     Can you recall approximately when that  
14       telephone call would have been?

15              A.     I have no idea.

16              Q.     Within a few weeks, apparently?

17              A.     I'm sure it was.

18              Q.     In June you went to Tallahassee?

19              A.     Yes.

20              Q.     On company business?

21              A.     No. This was personal. I went to see  
22       Elise.

23              Q.     You went to visit Elise?

24              A.     That's correct.

25              Q.     Let's digress and talk about that.



1                   What was your relationship to Elise at  
2   this time?

3           A.    Elise is a friend of mine.

4           Q.    And had been--

5           A.    She has been a friend of mine since  
6   1988.

7           Q.    Did you meet her at work?

8           A.    Yes, I did.

9           Q.    You had been social friends since '88?

10          A.    That is correct.

11          Q.    When did you first meet her?

12          A.    She worked in my office in Miami in  
13   1988.

14          Q.    In your office? A co-worker?

15          A.    A co-worker.

16          Q.    Were you peers?

17          A.    Peers.

18          Q.    Neither one of you had supervisory  
19   responsibilities?

20          A.    Over each of us, that's correct.

21          Q.    Is that when you first met her, in  
22   '88?

23          A.    That's correct.

24          Q.    You have been friends since you first  
25   met?

1 A. Yes.

2 Q. You socialize together?

3 A. Yes.

4 Q. Do you double date together? I don't  
5 know. Is she married?

6 A. She's not married, no.

7 Q. Do you go out socially in mixed  
8 company?

9 A. We have gone out socially a lot of  
10 times.

11 Q. On personal business?

12 A. Absolutely.

13 Q. Have you ever been in a social  
14 environment that was for business purposes,  
15 marketing client development, whatever?

16 A. No.

17 Q. So whenever you have gone out socially  
18 with her it's been for personal reasons with no  
19 affiliation to Southern Bell?

20 A. That is correct.

21 Q. She was then living in Tallahassee in  
22 June?

23 A. Yes, she was.

24 Q. When did she leave Miami?

25 A. I could not tell you exactly.

- 1 Q. Would it have been a long time?
- 2 A. No, not that long.
- 3 Q. Was this your first visit to see her
- 4 since her move?
- 5 A. Yes, it was.
- 6 Q. You were going up to Tallahassee to
- 7 visit a friend, basically?
- 8 A. Yes.
- 9 Q. You had no business motive?
- 10 A. Absolutely none.
- 11 Q. The travel arrangements, how did you
- 12 come to Tallahassee?
- 13 A. I called the airlines and made a
- 14 reservation and paid for my ticket.
- 15 Q. You bought your own plane ticket?
- 16 A. That is correct.
- 17 Q. The accommodations, you stayed at her
- 18 house?
- 19 A. That is correct.
- 20 Q. Was this a weekend?
- 21 A. Yes, it was.
- 22 Q. Did you take the time off work?
- 23 A. No, I don't think so.
- 24 Q. Do you recall the dates, by any
- 25 chance?

1 A. I have no idea.

2 Q. Again, you were not reimbursed by  
3 anybody, the company, or--

4 A. Absolutely not.

5 Q. All were personal expenses?

6 A. That's correct, personal expenses.

7 Q. When you and Elise went out, you  
8 typically went Dutch?

9 A. That depends. Sometimes I paid and  
10 sometimes she paid.

11 Q. Did you see Commissioner Beard during  
12 that visit?

13 A. Yes, I did.

14 Q. Did you go on a date?

15 A. Well, I went to dinner with him. At  
16 my age, a date is a little bit of a funny term.

17 Q. Did anyone join you at dinner?

18 A. No, it was just he and I.

19 Q. Who arranged that?

20 A. He and I did.

21 Q. Did he call you or did you call him?

22 A. He called me.

23 Q. Did he know you were coming to town?

24 A. Yes, he did.

25 Q. How do you know?



1 A. Because I told him.

2 Q. You called him beforehand?

3 A. No, he called me. We were talking. I  
4 said, "I'm thinking of going to see Elise."

5 Q. During the first phone call?

6 A. I imagine it's that phone call.

7 Q. I don't mean to pin you down or trick  
8 you.

9 A. No, no, no, it's okay. I just don't  
10 have a very good recollection over a year and a  
11 half ago of exactly what phone calls I made.

12 Q. During the phone call he initiated you  
13 said, "I think I am coming up to Tallahassee"? Do  
14 you recall? How did he know where to try to reach  
15 you?

16 A. I have no idea.

17 Q. But you got to Elise's and then he  
18 called you up and you arranged a dinner?

19 A. I think we were already planning on  
20 having dinner at some point. I am sure he called  
21 me then.

22 Q. The plans were basically prearranged  
23 before you arrived in Tallahassee?

24 MR. SALE: If you remember.

25 THE WITNESS: I don't remember. I

1 know he wanted to see me. I don't know exactly  
2 how we planned dinner or anything like that.

3 BY MR. CURINGTON:

4 Q. This was on a Saturday?

5 A. I have no idea. It was at some point  
6 during that weekend.

7 Q. Did you see him any further that  
8 weekend?

9 A. I may have, because we went  
10 rollerblading with his children. I believe it  
11 was that weekend.

12 Q. He has two children?

13 A. He has three. These are the two older  
14 ones.

15 Q. The two older children?

16 A. Yes, uh-huh.

17 Q. Did you go rollerblading down the  
18 street or in a facility?

19 A. We went to a park of some kind. I  
20 don't know what it is. It's the Long Trail. I'm  
21 not very familiar with Tallahassee.

22 Q. That's when you first met his two  
23 children?

24 A. Yes, that is correct.

25 Q. Was this like a Saturday or a Sunday

1       afternoon visit to the park?

2           A.     Pretty much, right.

3           Q.     You're not sure whether it was that  
4       initial visit in June?

5           A.     I'm not sure.

6           Q.     Did you have another visit close in  
7       time back to Tallahassee?

8           A.     I don't know if it was close in time.  
9       I know I went up there at another point.

10          Q.     When do you next recall speaking with  
11       or seeing Commissioner Beard?

12          A.     He called me after that.

13          Q.     After the dinner?

14          A.     Right, uh-huh.

15          Q.     Within a few days? Within the week?

16          A.     I would imagine within a few days.

17          Q.     And discussed personal social matters?

18          A.     Absolutely.

19          Q.     Did you ever discuss your job  
20       situation or his job situation?

21          A.     No, we did not.

22          Q.     You never complained about what was  
23       going on at the office and he never complained  
24       about what was going on at the office?

25          A.     At that point I didn't know him very

1 well.

2 Q. You spoke by phone then?

3 A. Yes.

4 Q. There was nothing particularly  
5 noteworthy about that phone conversation?

6 A. No.

7 Q. Did you arrange to speak to each other  
8 again at that point?

9 A. I don't think we arranged anything. I  
10 think it was understood that he would like to see  
11 me again.

12 Q. When did you next talk to him? Was  
13 there maybe a series of phone calls, or did you  
14 see him?

15 A. Sure.

16 Q. So there was a series of phone calls?

17 A. I imagine so.

18 Q. One of the phone calls led up to  
19 another social engagement?

20 A. Yes.

21 Q. Where was the next social engagement?

22 A. I went up to Tallahassee again.

23 Q. Primarily to see Commissioner Beard or  
24 primarily to see Elise?

25 A. Primarily to see Elise.



1 Q. Do you recall when that was?

2 A. I don't recall.

3 Q. Would it still be in the summer?

4 A. I really don't remember.

5 Q. Did you go swimming? Did you bring a  
6 sweater? Do you recall anything that might  
7 trigger your memory?

8 A. No, I don't really remember.

9 Q. Was it football weekend or anything?

10 A. I don't go to Seminole games. I am a  
11 Hurricane.

12 Q. But it's somewhere within the last  
13 eight or nine months?

14 A. Yes.

15 Q. We're talking about June of 1992?

16 A. Oh, sure.

17 Q. You don't recall whether it was summer  
18 or fall?

19 A. No.

20 Q. Tell me what you did. Was it another  
21 dinner date?

22 A. I imagine it was another dinner date.  
23 I really don't recall.

24 Q. Did you do other things like going  
25 rollerblading?

- 1           A.     We may have. I am truly drawing a  
2     blank.
- 3           Q.     You stayed with Elise on that visit?
- 4           A.     That is correct.
- 5           Q.     And you presumably did things with  
6     her?
- 7           A.     That is correct, uh-huh.
- 8           Q.     You flew up at your own expense?
- 9           A.     That is correct.
- 10          Q.     There were no reimbursements from  
11     anyone?
- 12          A.     No reimbursements from anyone.
- 13          Q.     When did you next speak or see  
14     Commissioner Beard?
- 15          A.     I don't know exactly when I spoke to  
16     him. As far as I can recall, the next time I saw  
17     him was in late July. I was in San Diego.
- 18          Q.     So it was between June and July then  
19     that you would have seen him on that second visit?
- 20          A.     That's probably correct.
- 21          Q.     Then you're saying you saw him in San  
22     Diego?
- 23          A.     That is correct.
- 24          Q.     Tell me about the San Diego visit.
- 25          A.     I was in San Diego with my daughter

1 staying at my nephew's house. We went out on  
2 vacation.

3 Q. Is that something that had been  
4 already planned?

5 A. Yes, it had been.

6 Q. How was it that Commissioner Beard was  
7 in San Diego?

8 A. Commissioner Beard had a conference in  
9 Seattle. When he finished the conference, he  
10 flew to San Diego.

11 Q. How long were you in San Diego?

12 A. I believe I was in San Diego maybe ten  
13 days.

14 Q. When he finished his business in San  
15 Diego, he came to visit you?

16 A. That's correct.

17 Q. That was prearranged?

18 A. That's correct.

19 Q. You flew out to San Diego at your own  
20 expense?

21 A. That is correct.

22 Q. No reimbursement?

23 A. No reimbursement.

24 Q. No business ties?

25 A. No business ties whatsoever.

1 Q. Did Commissioner Beard come to visit  
2 you toward the end of that ten days or at the  
3 beginning?

4 A. At the beginning.

5 Q. Did you go out together socially at  
6 that point?

7 A. Uh-huh.

8 Q. How many days did he see you or did  
9 you get together in San Diego?

10 A. Oh, I would say it was maybe two days  
11 he was there.

12 Q. Then you socialized, went out to  
13 dinner, or whatever you did, doing touristy  
14 things?

15 A. Yes, exactly.

16 Q. Then he jumped on a plane back to  
17 Florida?

18 A. Right.

19 Q. Did you fly back together?

20 A. Oh, no.

21 Q. No, you had a few more days there.

22 A. Yes, I was there longer than he was.

23 Q. He visited and then went back to work?

24 A. Yes, he went back to wherever.

25 Q. Did he talk about what he had done in



1       Seattle?

2           A.     Absolutely not.

3           Q.     Did he ever talk about what was going  
4       on in his job?

5           A.     Not really. I don't think he was  
6       interested in me for that reason. It was a  
7       personal thing.

8           Q.     You never talked about what was going  
9       on in your job?

10          A.     No. It's generally not exciting.

11          Q.     I presume -- I guess at that time you  
12       were getting to know each other, talking about  
13       personal interests, hobbies, and things of that  
14       nature?

15          A.     That is correct.

16          Q.     That would have been July. Do you  
17       recall the dates of that?

18          A.     I'm not sure. I believe I flew out  
19       there -- it may have been the 30th.

20          Q.     After the 4th of July weekend,  
21       presumably?

22          A.     Uh-huh.

23          Q.     So from July to the beginning of  
24       August?

25          A.     That is correct.

1 Q. When do you recall next seeing him?

2 A. I think I saw him at some point. He  
3 came down to Miami in August.

4 Q. Let me digress a moment and go back to  
5 these other visits.

6 A. Yes.

7 Q. Did anybody join you? Did you double  
8 date or do anything on that second visit to  
9 Tallahassee? Did you go out to dinner with any  
10 other couples?

11 A. Not that I can recall.

12 Q. Did Elise accompany you on any of the  
13 social things?

14 A. Not that I recall.

15 Q. In San Diego did Commissioner Beard  
16 have anybody with him or any staff?

17 A. He was by himself.

18 Q. And nobody else from Southern Bell was  
19 involved in any of those socials?

20 A. No, he and my daughter and I were  
21 involved.

22 MR. SALE: We need a break.

23 MR. CURINGTON: We need a break for  
24 lunch.

25 If you can just hold out.

1 BY MR. CURINGTON:

2 Q. Then Commissioner Beard came to Miami  
3 in August?

4 A. Yes.

5 Q. Do you recall when?

6 A. It was the weekend of Hurricane  
7 Andrew.

8 Q. Did he come down on a Friday to visit?

9 A. I cannot tell you absolutely. I don't  
10 remember exactly when he came.

11 Q. Was it prearranged that you would get  
12 together, he told you he was coming to town?

13 A. Sure.

14 Q. Do you recall Hurricane Andrew being  
15 the 24th?

16 A. Right.

17 Q. Do you recall what day of the week  
18 that was?

19 A. I believe it was in the morning early  
20 that it hit.

21 Q. Had he been down on the preceding  
22 weekend?

23 A. Yes, he had.

24 Q. Was he down on business; do you know?

25 A. I don't believe so. I believe it was

1       personal.

2               Q.     He came to visit you?

3               A.     Yes, uh-huh.

4               Q.     So we're probably talking about like  
5       August 22nd or the 21st, that time period?

6               A.     I imagine so, yes.

7               Q.     You socialized with him that weekend?

8               A.     Yes.

9               Q.     Did he stay at your house?

10              A.     Yes, I believe he did.

11              Q.     I believe this may be a time period in  
12       which we are talking about a number of state calls  
13       that are at issue that I presume you are familiar  
14       with?

15              A.     I have no idea. I haven't seen any  
16       list of state calls.

17              Q.     We will come back to his phone record  
18       in a minute.

19                     So he gets down to Miami and he visits  
20       with you. Is he at your home for two or three  
21       days visiting?

22              A.     Uh-huh.

23              Q.     Was there any shop talk during that  
24       visit?

25              A.     No.



1 Q. Just personal matters, hobbies,  
2 interests, what have you?

3 A. Exactly.

4 Q. I presume you went on the town  
5 somewhat and went out to dinner?

6 A. I'm sure we did.

7 Q. Did you observe him using your phone?

8 A. Sure, he used my phone all the time.

9 Q. Is that the first time he visited your  
10 home?

11 A. I am not sure. I can't remember  
12 exactly, but -- I'm not sure.

13 Q. Was he on the phone a lot?

14 A. Oh, there were several times he was on  
15 the phone a lot.

16 Q. Did that strike you as--

17 A. It struck me as disruptive.

18 Q. Did you participate in any of his  
19 phone calls?

20 A. Absolutely not, except maybe now if he  
21 called home and I had gotten on the phone and said  
22 hi to the kids.

23 Q. His kids?

24 A. Yes, that is correct.

25 Q. Did he ever give you his state credit

1 card to make phone calls with?

2 A. Absolutely not.

3 Q. Have you ever made a call using a  
4 state credit card?

5 A. Absolutely not.

6 Q. Did you generally excuse yourself when  
7 he got on the phone to talk business?

8 A. Sure. I think it's rude to sit and  
9 listen to someone on the phone.

10 Q. You didn't participate in any  
11 telephone conferences or anything of that nature?

12 A. I'm sorry? I didn't--

13 Q. Do you have a speaker phone where you  
14 can conference at your residence?

15 A. I don't have conferencing capabilities  
16 or a speaker phone either.

17 Q. Do you have more than one outlet?

18 A. Sure, there are outlets throughout the  
19 house.

20 Q. Two people could get on the phone at  
21 the same time?

22 A. There is a telephone upstairs and  
23 there is a telephone downstairs. I have never  
24 listened to any of his phone calls--

25 Q. Or joined in?

1           A.     --except of a personal nature when he  
2     has been talking to his children. I have never  
3     listened in on any of Commissioner Beard's  
4     telephone calls.

5           Q.     By saying "listening in," you're  
6     giving a negative connotation. That was not the  
7     intent of my question. I don't know if you got on  
8     the telephone to jointly discuss with a third  
9     party. That was the intent of my question.

10          A.     Absolutely not.

11          Q.     Do you recall what his plans were on  
12     that weekend in terms of returning to Tallahassee  
13     and how it was affected by the hurricane?

14          A.     No, I imagine he was returning home on  
15     Sunday, but that changed real quickly.

16          Q.     Do you recall what happened?

17          A.     Yes. He boarded up my house and we  
18     got packed in for a hurricane.

19          Q.     Do you recall when he started doing  
20     that?

21          A.     Sunday.

22          Q.     When the forecast was predicting it  
23     might make landfall in your vicinity?

24          A.     Yes, that's correct.

25          Q.     I presume he cancelled whatever travel

1 arrangements he had made?

2 A. I don't think he could have gotten out  
3 of town if he wanted. They had flown all of the  
4 planes out. Miami was getting shut down real  
5 fast.

6 Q. Do you recall if he had prior plans to  
7 leave on Sunday?

8 A. Yes, he was planning to leave on  
9 Sunday.

10 Q. That was cancelled and he was helping  
11 you to board up the house to get ready for the  
12 hurricane?

13 A. That is correct.

14 Q. Did you weather the hurricane at your  
15 home?

16 A. Yes, we did.

17 Q. He stayed with you?

18 A. That is correct.

19 Q. So you sat out the hurricane in your  
20 home?

21 A. Uh-huh.

22 Q. How much longer did the commission  
23 stay at your home?

24 A. I don't remember exactly, but I know  
25 he was there a few days.



1 Q. Did you return to work?

2 A. Not immediately, no.

3 Q. When did you return to work after the  
4 hurricane?

5 A. I believe it was the following Monday.

6 Q. The entire week of the hurricane you  
7 stayed at home?

8 A. That's correct.

9 Q. Do you recall if Commissioner Beard  
10 stayed at your home that entire week?

11 A. I don't recall. He went out on  
12 business as soon as you can get out. You could  
13 not get out at first.

14 Q. You were trapped in the house for a  
15 few days?

16 A. That's correct. There was no power.  
17 The trees were all down. It was a very bad  
18 situation.

19 Q. Do you know how many days you were  
20 isolated by the hurricane?

21 A. I imagine it was maybe the first day  
22 or so.

23 Q. Did you have a phone then?

24 A. Yes, I did. I had phone service  
25 throughout.

1 Q. You had phone service?

2 A. Yes.

3 MR. KUEHNZ: That was Southern Bell  
4 phone service.

5 BY MR. CURINGTON:

6 Q. Did you get preferential treatment?

7 A. No, I did not. I did not have power  
8 throughout, I can tell you that.

9 Q. Did you observe Commissioner Beard  
10 making numerous calls during that period?

11 A. Absolutely.

12 Q. Again, you did not participate in any  
13 of those?

14 A. I did not participate.

15 Q. When you were finally able to get out  
16 of the house, you did not go to work. Did you get  
17 out of the house personally to go grocery  
18 shopping?

19 A. Yes. You had to go find water and ice  
20 and money. There was nothing in the stores.  
21 Everything was shut. It was very hard just  
22 getting out of where you lived. You know, you had  
23 to get supplies and things.

24 Q. What did the commissioner do during  
25 that period? Did he help you go grocery shopping?

1 Was he helping you with your needs?

2 A. Well, he went with me to try to get  
3 water and money. He was also doing a lot of other  
4 things. He was going off. I don't know who he  
5 was seeing or what he was doing.

6 Q. Did he have a rental car? How was he  
7 getting about?

8 A. I believe he had a rental car. I  
9 don't remember exactly.

10 Q. Did you ever accompany him on business  
11 trips?

12 A. Absolutely not.

13 Q. He did accompany you on a few personal  
14 errands during the day and at night?

15 A. Sure.

16 Q. He was not keeping regular hours?

17 A. He was not keeping regular hours.

18 Q. Do you know who he was calling?

19 A. I have no idea.

20 Q. Are you aware of what he was doing in  
21 terms of trying to assist in the hurricane  
22 relief?

23 A. I don't know.

24 Q. Did he ever say to you, "Listen, I'm  
25 about to go to meet with the emergency relief team

1 here"? Did he ever talk about what he was going  
2 to do that day?

3 A. No, not that I can recall. I know at  
4 some point he told me they had asked him to be on  
5 a disaster team or something. That's about all I  
6 can remember.

7 Q. Did he say that was the governor that  
8 appointed him?

9 A. I believe somebody either appointed  
10 him or asked him to do it. I really don't  
11 remember who that was.

12 Q. Did he ever say to you, "What can I do  
13 to help Southern Bell to get these phones back in  
14 operation"?

15 A. Absolutely not.

16 Q. Did he ever say whether he was going  
17 to help Florida Power & Light get their power  
18 lines going?

19 A. No, he didn't.

20 Q. He didn't really talk about what he  
21 was doing to help with the hurricane relief then?

22 A. No.

23 Q. You are agreeing with me he didn't  
24 discuss it?

25 A. No, he did not discuss that, no.



1 Q. Would he come home at the end of the  
2 day, basically? Did he continue to stay at your  
3 home?

4 A. From what I recall, he did. I'm not  
5 absolutely sure, but I believe so.

6 Q. He never came home and said, "I had a  
7 rough day; I've been running around"? He didn't  
8 say that?

9 A. He didn't say specifically. Miami was  
10 chaotic. I mean that's about all everybody  
11 talked about, was the hurricane and how terrible  
12 things were. Sure we talked about that. My  
13 brother's house was almost totally destroyed.  
14 There were a lot of people--

15 Q. Did he ever discuss what he had done  
16 that day or whom he had met with, what he had  
17 accomplished, or anything of that nature?

18 A. Not that I recall specifics, no.

19 Q. Did he ever say who he was going to  
20 meet with or who he needed to talk to?

21 A. No, he did not. He did mention at one  
22 time he went on a helicopter ride. I do remember  
23 that.

24 Q. Were you calling into your office at  
25 all during this period?

1           A.     Well, not initially, but, yes, I spoke  
2     to them.

3           Q.     To let them know you couldn't get in?

4           A.     That's exactly right.

5           Q.     Anything else?

6           A.     I don't understand the question.

7           Q.     Did they ever say, "Listen, we are  
8     short-handed, we need every warm body we can get;  
9     when can you come back"?

10          A.     I understood as soon as it was  
11     feasible for me, I needed to get back to the  
12     office, yes.

13          Q.     Were you involved at all with the  
14     relief efforts?

15          A.     Absolutely.

16          Q.     How?

17          A.     When I got back to work, everybody in  
18     Southern Bell was involved in the relief effort.  
19     We did whatever we had to do.

20          Q.     What did your department do? What did  
21     your corporate and external affairs do?

22          A.     We did employee bulletins and things  
23     telling employees where they could get help.  
24     They set up relief -- the Pioneers set up relief  
25     depots and everything like that. I loaned some of

1 my people out. I was getting phone calls from  
2 other people asking for people. I loaned some of  
3 my people to the areas.

4 Q. Did you have your responsibility for  
5 getting service back on?

6 A. No, that's not our department.

7 Q. Did Commissioner Beard ever talked  
8 about what he needed to do to get service back to  
9 the people, whether phone service or utilities or  
10 power?

11 A. No, that I can recall, no.

12 Q. I take then eventually towards the end  
13 of the week he returned to Tallahassee?

14 A. That is correct.

15 Q. Am I safe in assuming there were  
16 intermediate phone calls, personal phone calls,  
17 telling each other what was going on?

18 A. I am sure that's a safe assumption.

19 Q. You talked on the phone between  
20 visits?

21 A. I am sure we did.

22 Q. When do you recall the next visit?

23 A. At some point in September, he came  
24 down again.

25 Q. In September of '92.

1                   On business?

2           A.     No, it was -- well, it was personal,  
3     that I can recall, but I really don't remember. I  
4     know he had meetings down here, and he came down  
5     personally. I don't remember the specifics of  
6     which were which.

7           Q.     Was it on a weekend?

8           A.     I would assume it was.

9           Q.     Did he stay with you then on that  
10    visit?

11          A.     I have no idea. He stayed at my  
12    house, and sometimes he may not have stayed at my  
13    house. I have no idea specifically when he did or  
14    did not.

15          Q.     But he stayed at your house on more  
16    than one occasion?

17          A.     I am sure he has, yes.

18          Q.     On this September visit, you don't  
19    recall whether he was down on business?

20          A.     I do not recall.

21          Q.     Do you recall how long he was down?

22          A.     I do not recall.

23          Q.     What was the extent of your social  
24    contact?

25          A.     With him?



1 Q. Yes. Did you have dinner or did you  
2 spend the weekend together or the afternoon; do  
3 you recall?

4 A. No, I have no idea.

5 Q. What stands out? Why do you even  
6 recall he was down in September?

7 A. Because the next time I remember him  
8 coming down was for my father's funeral. I know I  
9 had seen him in between then.

10 Q. That's all you recall about that  
11 visit, basically?

12 A. Yes.

13 Q. Then I take it there was another visit  
14 when your father passed away?

15 A. That's correct.

16 Q. When was that?

17 A. October 18th.

18 Q. That was the day of the funeral?

19 A. That was the day he passed away.

20 Q. My condolences.

21 A. Thank you.

22 Q. And Commissioner Beard came down  
23 during that period?

24 A. That's correct.

25 Q. He gave you support, emotional

1 support?

2 A. That's correct, uh-huh.

3 Q. Do you recall how long he stayed down  
4 during that visit?

5 A. I believe he was down a good three or  
6 four days.

7 Q. Did he stay with you?

8 A. Yes, he did.

9 MR. SALE: Let me state our position  
10 again at this time.

11 When there is some indication,  
12 something in the record or anything else that  
13 gives you the necessity to ask these questions,  
14 we understand, such as phone calls or something,  
15 but once it becomes abundantly clear it's  
16 strictly personal, a death in the family, here  
17 for emotional support, it is strictly personal.  
18 I am not sure frankly where somebody slept or  
19 something like that really adds to what your  
20 responsibility is to inquire into this. So, if it  
21 continues along these lines, we will have to ask  
22 her not to answer. Up to this point, I think it's  
23 okay.

24 MR. CURINGTON: I apologize. I know  
25 it's a sensitive area. I don't mean to intrude.

1 BY MR. CURINGTON:

2 Q. Do you know whether he made phone  
3 calls from your residence at that point?

4 A. He always used the phone from my  
5 house. That's a pretty safe assumption.

6 Q. Again, he has never authorized you and  
7 you have never used his state credit card?

8 A. Absolutely correct.

9 Q. Through today?

10 A. Through today I have never used a  
11 state credit card or any other credit card.

12 Q. When did you next see Mr. Beard?

13 A. I couldn't tell you specifically, but  
14 I know I saw him in December at some point.

15 Q. Where was that?

16 A. Well, I believe he came to Miami.

17 Q. Do you know if it was a business visit  
18 or purely social?

19 A. I know at some point in there he came  
20 down. He drove down with his daughter. He was  
21 down. I don't remember exactly when that was.

22 Q. Did he by chance spend the holidays  
23 with you?

24 A. That was another trip, but I know in  
25 between there he came down with his daughter.



1       Sometime between October and December in there,  
2       he came down with is daughter.

3           Q.       There was also a December visit?

4           A.       Yes, there may have been more than one  
5       December visit. I know he was down after  
6       Christmas.

7           Q.       After Christmas?

8           A.       Yes.

9           Q.       During any of those visits did you  
10       ever go out and socialize with other employees of  
11       Southern Bell?

12          A.       Absolutely not.

13          Q.       You never double dated, never had a  
14       dinner engagement?

15          A.       No.

16                    Elise also came down for my father's  
17       funeral, so he was around Elise at that point. We  
18       had never double dated in that time frame with  
19       anybody.

20          Q.       Were there any cocktail parties or  
21       social events company-oriented that you attended?

22          A.       With him?

23          Q.       With Commissioner Beard.

24          A.       No, absolutely not.

25          Q.       During all of these visits basically



1 there were no other employees from the company,  
2 there were no company functions the two of you  
3 participated in?

4 A. That is correct.

5 Q. You are saying there was no discussion  
6 about what was going on in your job or what was  
7 going on in his job?

8 A. No.

9 Q. You are agreeing?

10 A. Yes, I am agreeing there were no  
11 discussions. I mean I'm not saying I never came  
12 home and said, "Gee, I had a lousy day today," or  
13 wished my boss would be a little nicer or  
14 something like that, but there were no  
15 discussions of substance, absolutely.

16 Q. When do you recall next visiting the  
17 commissioner?

18 A. I know he came down in January. He  
19 flew in with his son. And he came down in  
20 January. Before that he also came down another  
21 time. He came down at some point in mid-January.

22 Q. Were these business or personal  
23 visits?

24 A. Those were both personal, if I recall.  
25 We went in mid-January down to Key West, I

1 believe.

2 Q. Did you take his son with you?

3 A. No, that was he and I.

4 Q. You went to Key West for a weekend?

5 A. Yes.

6 Q. You drove down there?

7 A. Yes, we did.

8 Q. In your car or his car, a rental car?

9 A. My car.

10 Q. As far as you know, he didn't use a  
11 state credit card or anything to charge it? It  
12 was a purely personal visit?

13 A. Absolutely personal.

14 Q. Was that like a long weekend?

15 A. It may have been.

16 Q. During any of these visits, were you  
17 taking leave from the company? Did you take long  
18 weekends?

19 A. I took vacation time, sure. There  
20 were times when I may have taken vacation days,  
21 uh-huh.

22 Q. You described earlier the types of  
23 vacation days.

24 A. Yes.

25 Q. I'm not sure if I remember them all.

1 Some were company days. Did the company give you  
2 any time off to spend with Commissioner Beard?

3 A. Absolutely not. That's my personal  
4 vacation which I take as I see fit. I am entitled  
5 to do that, as any other employee.

6 Q. I understand that.

7 They didn't give you any company time  
8 as far as those categories?

9 A. Absolutely not.

10 Q. It was a personal vacation?

11 A. Yes.

12 MR. SALE: There may have been a  
13 miscommunication on the question that wasn't  
14 intended.

15 Did the company suggest that the  
16 company knew she was taking time off to be with  
17 Commissioner Beard?

18 THE WITNESS: The company didn't know  
19 what I was doing. That's my business, my private  
20 life.

21 BY MR. CURINGTON:

22 Q. Does Elise know you are going out with  
23 the commissioner?

24 A. Elise knows.

25 Q. Does anyone else?

1           A.     At that point late in November, Joe  
2 Lacher was informed. That was when Tom talked to  
3 him.

4           Q.     You never talked to him personally?

5           A.     Then I talked to Hank after that.

6           Q.     When you briefly described.

7           A.     Yes.

8           Q.     Sometime in November?

9           A.     Late November or maybe December, right  
10 in there.

11          Q.     When you were taking vacations, you  
12 weren't telling them the nature of your days off?

13          A.     Of course not. I don't tell them when  
14 I take time off. Even if Tom is not around,  
15 that's not their business.

16          Q.     You believe there were two visits in  
17 January?

18          A.     I believe so.

19          Q.     Again, you believe it was just  
20 personal, no business for Commissioner Beard?

21          A.     The first one was. The second one was  
22 for my aunt. My mother's sister passed away.  
23 They had a memorial service. He came down and  
24 brought his son.

25          Q.     That's the one where he drove from



1 Tallahassee?

2 A. No, I believe they both flew in. He  
3 drove down with his daughter at some point. That  
4 was earlier.

5 Q. Again, there was no interaction with  
6 company officials during these visits to Key  
7 West?

8 A. It was just the two of us.

9 Q. When do you recall your next visit?

10 A. Well, he came in February, because he  
11 was here for Valentine's Day. I am pretty sure it  
12 was that weekend.

13 Q. Could you tell whether it was a purely  
14 personal visit?

15 A. I believe it was purely personal, yes.

16 Q. Did you have any notion at this time  
17 that on most of these trips he was buying his own  
18 plane ticket? Did he ever say, "I am down on a  
19 state visit, so I might as well visit you"? Did  
20 these appear to be personal visits where he was  
21 paying his own way?

22 A. He mentioned using frequent flyer  
23 tickets sometimes, and at other times, such as  
24 when he and his son flew, he told me he had gotten  
25 a pretty good rate from U.S. Air. I assumed he

1 bought his ticket. After the hurricane, I know he  
2 was down on company -- state business. I don't  
3 know what you call it.

4 Q. And on the Valentine's visit?

5 A. I do not have any personal knowledge  
6 of how Tom Beard paid for his tickets. I never  
7 witnessed him.

8 Q. I understand that.

9 Did he ever say, "Listen, I'm going to  
10 be down on state business; why don't I stay an  
11 extra day and go down to the Keys," that kind of  
12 conversation?

13 A. No, not that I can recall.

14 Q. So he visited you on Valentine's Day.  
15 Was that a weekend; do you recall? Were most of  
16 his visits on weekends?

17 A. I believe so.

18 Q. Is there anything about that visit  
19 that you recall?

20 A. Such as personal, yes, I recall that  
21 weekend. I don't think that's exactly what you  
22 are interested in.

23 Q. Did you again go out with any company  
24 officials and talk business?

25 A. No, we went to Key Largo. We were by

1 ourselves.

2 Q. You drove your car?

3 A. My car, that is correct.

4 Q. Key Largo is where you met?

5 A. Yes.

6 Q. Did you go back to Ocean Reef?

7 A. No, we did not.

8 Q. What was your next visit?

9 A. I believe the next time I saw him was  
10 when I went to Washington with him.

11 MR. CURINGTON: I take it we're  
12 running close to the end of your visits, so to  
13 speak.

14 Do you want to break at that point?

15 MR. SALE: As long as it's not too  
16 long, it's all right.

17 (Short recess taken for court reporter  
18 to change paper.)

19 (Thereupon, the preceding two  
20 questions and answers were read back by the court  
21 reporter.)

22 BY MR. CURINGTON:

23 Q. Before we get to the Washington visit,  
24 are there any other out-of-state visits other  
5 than San Diego?

1           A.     Yes, there was one where we went to  
2     California.

3           Q.     Between the San Diego and Washington  
4     visit?

5           A.     That's correct.

6           Q.     You saw Commissioner Beard during  
7     that?

8           A.     Yes, I did.

9           Q.     Where was that trip?

10          A.     We flew into L.A., Los Angeles, and  
11     drove up the coast to Big Sur. We went to  
12     Yosemite. We then flew out of San Francisco.

13          Q.     Do you recall when that was?

14          A.     It was in November, I believe.

15          Q.     You flew into Los Angeles and left  
16     from San Francisco?

17          A.     Right.

18          Q.     At personal expense?

19          A.     He paid for my ticket.

20          Q.     Did he do any state business while out  
21     there?

22          A.     I believe he had just finished a  
23     conference in Los Angeles?

24          Q.     He finished a conference in Los  
25     Angeles?



1 A. I believe so.

2 Q. And you joined him at the end of the  
3 conference?

4 A. The conference was over, yes.

5 Q. Did he talk about what went on during  
6 the conference, what he had accomplished?

7 A. No.

8 Q. He never discussed his job?

9 A. No. Frankly, I think he was just glad  
10 to see me.

11 Q. You never discussed your job?

12 A. No, I don't think we did.

13 Q. Let's talk about the Washington visit.  
14 Was that a convention of some sort?

15 A. Yes, I believe it was.

16 Q. Do you recall what?

17 A. I think he went up -- I think it was  
18 NARUC.

19 Q. How long were you in Washington?

20 A. I believe we flew in on Friday and I  
21 flew out Monday.

22 Q. He stayed longer?

23 A. That's correct.

24 Q. Did you travel at your own expense?

25 A. Yes, he paid for my ticket.

1 Q. He had business obviously at this  
2 convention?

3 A. Right.

4 Q. Did you have any Southern Bell  
5 business?

6 A. No.

7 Q. Did you attend any functions at that  
8 convention?

9 A. No.

10 Q. Any social functions?

11 A. No. There was one reception where we  
12 walked in for a minute and turned around and  
13 walked out.

14 Q. Were you introduced at that function  
15 to some people?

16 A. Yes, I was.

17 Q. Do you recall who you were introduced  
18 to?

19 A. I was introduced to Julia Johnson,  
20 Susan Clark, and Luis Loreda.

21 Q. Who is Luis Loreda?

22 A. He's a commissioner.

23 Q. Were you introduced to the entire  
24 commission?

25 A. To this date, I have never met Terry

1       Decene (phonetic).

2           Q.     How were you introduced?

3           A.     "This is Alma Paruolo; this is Julia  
4       Johnson; nice to meet you."

5           Q.     Did he identify you as a Southern Bell  
6       employee?

7           A.     Absolutely not.

8           Q.     Did he identify you as his girlfriend?

9           A.     No, he identified me as Alma Paruolo.

10          Q.     That was the extent of your  
11       introduction?

12          A.     That's correct.

13          Q.     You then talked for a while with these  
14       people?

15          A.     Very briefly.

16          Q.     Do you recall what you spoke about?

17          A.     No. Susan Clark said she lived in  
18       Miami. I believe we spoke about Miami. Julia, I  
19       don't remember. And Luis was talking about he was  
20       going over to have dinner with someone. I don't  
21       know.

22          Q.     How long did this thing occur?

23          A.     It took maybe ten minutes.

24          Q.     Did you discuss any business about  
25       what was going on at the convention?

1           A.     Absolutely not. I don't believe the  
2 convention had started yet. It was going to  
3 start.

4           Q.     Do you recall what day of the week you  
5 met?

6           A.     I believe it was a Sunday night.

7           Q.     Was this like a welcoming reception?

8           A.     It may have been, uh-huh.

9           Q.     Did you run into any Southern Bell  
10 employees at this convention?

11          A.     Yes, we did. We had dinner I believe  
12 Saturday night with Tony Lombardo and his wife  
13 Barbara.

14          Q.     What was discussed at dinner?

15          A.     It was their thirtieth wedding  
16 anniversary. They called and invited us to  
17 dinner. We took them a bottle of champagne as an  
18 anniversary present. It was a social  
19 conversation. I remember discussing children  
20 quite a bit.

21          Q.     Did you discuss any business?

22          A.     Absolutely not.

23          Q.     Who else was present at dinner?

24          A.     The four of us.

25          Q.     Just the four of you celebrating their



1 anniversary?

2 A. Tony and Barbara's thirtieth  
3 anniversary, that is correct.

4 Q. Were there other Southern Bell  
5 employees up there, that you know of?

6 A. Not that I saw, no.

7 Q. What was Mr. Lombardo doing up there?

8 A. I have no idea.

9 Q. At this point in time, did you have an  
10 opinion as to whether or not Mr. Lombardo and  
11 Commissioner Beard were old friends or newly  
12 acquainted? What was your impression of their  
13 relationship?

14 A. I don't think newly acquainted or old  
15 friends. I think somewhere in between.

16 Q. How would you characterize that  
17 relationship?

18 A. I don't know. It's hard to  
19 characterize something from sitting down at  
20 dinner with people for a couple of hours. They  
21 are comfortable with each other. They seem to  
22 respect each other. Beyond that, I have no idea.

23 Q. Did they talk about personal things,  
24 like the last time they played golf or the last  
25 time they saw each other?

1 A. No.

2 Q. Did they reminisce about old times?

3 A. Absolutely not.

4 Q. The conversation was dealing more with  
5 current matters?

6 A. It was talking about kids a lot and  
7 just things of that nature.

8 Q. Whose kids?

9 A. All of our kids.

10 Q. Everybody's?

11 A. Everybody's kids; and how they get  
12 when they get older and start having boyfriends  
13 and girlfriends, et cetera.

14 Q. Did you start exchanging pictures?

15 A. No pictures. We were exchanging just  
16 general aggravation stories, I guess.

17 Q. It was a long dinner then.

18 Were there any other social events  
19 that you attended during that convention?

20 A. No.

21 Q. The trip back to L.A., that was all  
22 concluded before you arrived?

23 A. That's correct.

24 Q. Did you see any Southern Bell  
25 employees?

1           A.     I didn't see anybody. He picked me up  
2     at the airport and we drove to Big Sur.

3           Q.     When did you next see him after  
4     Washington?

5           A.     After Washington?

6           Q.     When would this have been, February?

7           A.     I think late February. I'm really not  
8     sure. That's hard to say. I mean I may have seen  
9     him in between. The next time I recall seeing him  
10    for sure was the week of my birthday, which was  
11    the week of spring break.

12          Q.     When was your birthday, your visit?

13          A.     My birthday is April 7. It was that  
14    week. I guess I went up there like April 3rd.

15          Q.     So you went to Tallahassee?

16          A.     That is correct.

17          Q.     This was purely as a social visit?

18          A.     I drove to Tallahassee with my  
19    daughter for personal reasons, yes.

20                 MR. SALE: Excuse me for one second.

21                 (Conversation held outside the hearing  
22    of the court reporter between the Deponent and  
23    Mr. Sale.)

24    BY MR. CURINGTON:

25          Q.     Primarily to see Commissioner Beard at

1       that point?

2                   Were you seeing Elise, also?

3           A.       That was to see Commissioner Beard.

4           Q.       Did you stay with Elise there?

5           A.       No, I did not.

6           Q.       How long did you stay up there?

7           A.       I got there Saturday night. I believe  
8 we left the following Sunday -- not that Sunday,  
9 but the Sunday afterwards, which would have been  
10 I believe April 11.

11          Q.       So you were there about eight days?

12          A.       That is correct.

13          Q.       Did you go to St. George's Island  
14 during this week, this trip?

15          A.       Yes.

16          Q.       So you were in North Florida for eight  
17 days, or thereabouts?

18          A.       That's correct.

19          Q.       Somewhere in that period you went to  
20 St. George's?

21          A.       That is correct.

22          Q.       Let's go back to Tallahassee for a  
23 moment.

24                   Did you visit with any other Southern  
25 Bell employees or did you see Elise on that visit



1 at all?

2 A. I know I saw Elise at the end of the  
3 week. I don't think I saw her initially.

4 Q. During any of these visits to  
5 Tallahassee did you ever mention any business  
6 with the regulatory relations people, making any  
7 phone calls to them?

8 A. Absolutely not. My calls to Elise  
9 were strictly personal. Elise is my friend.

10 Q. Is Elise with REG relations?

11 A. Yes, she is.

12 Q. But you never called REG relations or  
13 public affairs to talk about any housekeeping  
14 matters?

15 A. Absolutely not.

16 Q. When you had business with them, you  
17 called from Miami?

18 A. That's correct.

19 Q. When you called Elise at work, that  
20 was for personal matters?

21 A. That depends. I am her training  
22 coordinator. I am her MTR coordinator.

23 Q. I'm saying while in Tallahassee did  
24 you ever call her at the office or would you call  
25 her at home?

1           A.     I don't know. I could have called her  
2 either way. I will call her at the office for  
3 personal reasons, also. If I call her from Miami,  
4 it does go on my personal credit card if it's  
5 personal, okay?

6           Q.     You had your daughter with you. Did  
7 you go to St. George's Island on this visit?

8           A.     Yes, we did.

9           Q.     Who all went to St. George's Island?

10          A.     Tom, his two oldest children, my  
11 daughter, and myself.

12          Q.     Where did you stay?

13          A.     We rented a house on the beach.

14          Q.     That Commissioner Beard paid for?

15          A.     Yes, he did pay for it. I did not pay  
16 for it.

17          Q.     Do you know that or do you know if it  
18 was possibly complimentary from someone?

19          A.     No, he went to the realty office. He  
20 said he was going in to pay. I imagined he went  
21 in to pay.

22          Q.     You have no reason to believe then it  
23 was the home of a lobbyist or anything of that  
24 nature?

25          A.     Absolutely not.

1 Q. Do you remember what realty company it  
2 was?

3 A. Alice Collins Realty Company, if I  
4 remember correctly. I am not absolutely sure  
5 about that, but I'm pretty sure. It's a green  
6 office building right there on the island.

7 Q. And he said he was going in to pay for  
8 it?

9 A. I drove him there.

10 Q. Was this before or after you were  
11 leaving?

12 A. We went both times. We went before  
13 and after.

14 Q. How long did you stay at St. George's?

15 A. I believe we went late Tuesday and  
16 came back Saturday morning.

17 Q. Did you meet any company officials  
18 there or any PSC staff?

19 A. On Tuesday -- I believe it was either  
20 Monday or Tuesday -- I went to Tom's office for  
21 the first time. I met his secretary and his  
22 assistant.

23 Q. I'm sorry? Tuesday?

24 A. It was either Monday or Tuesday I  
25 went. He was at the office and I went by there.

1 Q. And met his secretary?

2 A. And his assistant for the first time.

3 Q. Who was the assistant?

4 A. Bill Gibson, I believe, is his name.

5 Q. Who is like an staff assistant, or do  
6 you know?

7 A. He's Tom's assistant. I don't know  
8 what his title is.

9 Q. This is before you headed to St.  
10 George's?

11 A. That's correct.

12 Q. Do you know a Tim McCabe?

13 A. Tom McCabe.

14 Q. Tom McCabe?

15 A. Yes, I know Tom McCabe.

16 Q. Who is Tom McCabe?

17 A. He is Elise's boyfriend.

18 Q. Is he a PSC employee?

19 A. I believe so, yes. That's what the  
20 newspapers are saying.

21 Q. Did you ever socialize with the two of  
22 them together?

23 A. Yes, we have.

24 Q. When did you socialize with them?

25 A. They came to St. George's Island for



1 one night.

2 Q. On this trip?

3 A. That's correct.

4 Q. You spent one evening there?

5 A. Yes.

6 Q. You spent the day on the beach or  
7 whatever doing things?

8 A. Uh-huh.

9 Q. Were there any discussions of Southern  
10 Bell's business or any discussion of PSC  
11 business?

12 A. No, we did not discuss that. It was a  
13 social visit. We made dinner and sat and played  
14 Nintendo, Dr. Mario. And you can put down that I  
15 beat Tom McCabe.

16 Q. Did you ever socialize in that context  
17 with any PSC staff or analysts?

18 A. No.

19 Q. This is as close as you came to having  
20 a double date with Elise or anyone else?

21 A. That's as close as it ever got.

22 Q. You returned to Tallahassee. Then you  
23 drove back to Miami?

24 A. That's correct.

25 Q. I understand upon the return from St.

1 George's you noted the burglary of Commissioner  
2 Beard's house.

3 A. That's correct.

4 Q. We will get into that after lunch.  
5 Let me go back.

6 There was the Washington visit and  
7 then the Tallahassee/St. George's week. When did  
8 you next visit with the commissioner, or was that  
9 when the press started coming out?

10 A. That's when the press started coming  
11 out, but I have seen him since.

12 Q. When have you seen him?

13 A. I have been to Tallahassee. He has  
14 been to Miami.

15 Q. When did you come back to Tallahassee?

16 A. I was there not this weekend, but the  
17 weekend before.

18 Q. So what, a week or two after the St.  
19 George's visit?

20 A. That's probably accurate. I'm not  
21 sure.

22 Q. You drove or flew?

23 A. I bought a ticket and flew.

24 Q. And you stayed with Elise, or did you  
25 stay with the commissioner?

1 A. I stayed with Tom.

2 Q. Was that a weekend again?

3 A. Yes, it was.

4 Q. Again, was there any leave involved?

5 Were you taking leave at these points?

6 A. No.

7 Q. The times you were taking leaves, do  
8 you know if the commissioner was taking leave  
9 from his job?

10 A. I have no idea. We did not discuss  
11 that.

12 Q. You came back to Tallahassee. Was  
13 that like a weekend though?

14 A. Yes.

15 Q. Were there any meetings with any  
16 Southern Bell people or any PSC people?

17 A. I saw Elise that Sunday night, she and  
18 I. She came and picked me up at Tom's house. She  
19 and I went out together.

20 Q. And you talked about personal things,  
21 no company business?

22 A. That is correct.

23 Q. When did he come back to Miami?

24 A. This past weekend he was here.

25 Q. This past weekend?

1 A. Uh-huh. We went to Key West.

2 Q. Just the two of you?

3 A. That is correct.

4 Q. Personal, no business?

5 A. That's correct.

6 Q. You saw no company officials there?

7 A. No.

8 Q. No PSC people?

9 A. Just the two of us.

10 Q. Everything we have discussed for the  
11 last hour or two, it's your position you never  
12 talked about Southern Bell matters together?

13 A. That's absolutely correct. I told  
14 you, I may have come home and said that I had a  
15 rotten day, that type of thing. We have never  
16 discussed anything substantively, absolutely not.

17 Q. And having dinner with the Lombardos  
18 in Washington or down at the poolside during the  
19 Ocean Reef visits, there was no conversation of  
20 anything substantive?

21 A. That was strictly social.

22 Q. Other than the trips to Birmingham  
23 that you mentioned, has the company paid for any  
24 of this travel or reimbursed you for anything?

25 A. Absolutely not



1 MR. CURINGTON: This is probably a  
2 good breaking point for lunch.

3 THE WITNESS: Can I make one  
4 statement?

5 All those things on there, that's to  
6 the best of my recollection.

7 MR. CURINGTON: I understand.

8 THE WITNESS: It's very hard to go  
9 back and say I was exactly here or there, you  
10 know. He came down so many times. I just wanted  
11 to make that very clear, that I am doing the best  
12 I can to recall.

13 MR. CURINGTON: I appreciate that.

14 Do you want to order sandwiches or do  
15 what?

16 MR. ANTHONY: How much more do you  
17 think you have?

18 MR. CURINGTON: I don't know.

19 This can be off the record.

20 (Discussion held off the record)

21 (Thereupon, a luncheon recess was  
22 taken at 1:50, and the proceedings resumed at  
23 2:30 as follows:)

24 MR. CURINGTON: Are we ready to  
25 resume?

1 MR. SALE: We are ready to resume.

2 MR. ANTHONY: Yes.

3 MR. CURINGTON: I think we will mark  
4 this Intervenor's Exhibit 1.

5 (Thereupon, said document was marked  
6 as Intervenor's Exhibit No. 1 for  
7 identification.)

8 BY MR. CURINGTON:

9 Q. I ask you if you can identify what has  
10 been marked as Intervenor's 1?

11 A. That's the vacation schedule.

12 Q. Is that form routinely used by the  
13 company?

14 A. That's correct, uh-huh.

15 Q. Is this your personal vacation time?

16 A. That is correct.

17 Q. That's for the entire year, 1972?

18 A. 1992.

19 Q. 1992, excuse me.

20 A. Yes.

21 Q. That's through April 9 of 1993?

22 A. That's correct.

23 Q. If you would, you first met  
24 Commissioner Beard in May of '92, correct?

25 A. That is correct.

1 Q. Around the 30th?

2 A. Uh-huh.

3 Q. It shows no leaves during that time  
4 frame at the end of May, correct?

5 A. That's correct.

6 Q. Could you explain and go through with  
7 me each month? You have got some leave on the  
8 21st and the 22nd of May.

9 A. Right.

10 Q. What does VT stand for and the HU?

11 A. VT is vacation time. The HU is  
12 optional holiday.

13 Q. Do you recall what that leave was for?

14 A. I have no idea.

15 Q. Going to June 6th, there is a VT,  
16 vacation time. Do you recall what that was for?

17 A. I do not.

18 Q. If we go back to your visits, you went  
19 to Tallahassee in June of '92. Would that have  
20 been an extended weekend or--

21 A. I cannot ascertain that. I don't know  
22 why I took that day, so I cannot connect it with  
23 my visit to Tallahassee, because I'm not sure.

24 Q. You do not recall?

25 A. I do not recall.

1 Q. That was July 6th, apparently?

2 A. Yes.

3 Q. August 3rd, 4th, 5th, 6th, and 7th  
4 shows vacation time.

5 A. July 6th? That's the 4th of July  
6 weekend?

7 Q. I don't know.

8 A. Yes, I bet it was. I was in Fort Myers  
9 Beach with my family.

10 Q. What about August? Is it the 3rd,  
11 4th, 5th, 6th, and 7th?

12 A. Yes.

13 Q. Do you recall that as vacation leave  
14 again?

15 A. Yes, it is.

16 Q. Do you recall what that was for?

17 A. I imagine that was probably San Diego.

18 Q. That VT stands for personal vacation?

19 A. That's correct.

20 Q. And then a personal vacation day on  
21 August 31st.

22 A. Okay.

23 Q. Do you recall what that might have  
24 been?

25 A. I have no idea.



1 Q. Your earlier testimony suggested that  
2 Commissioner Beard was in Miami throughout the  
3 hurricane.

4 A. Right.

5 Q. You show no leave during the hurricane  
6 of August 22nd, through that period.

7 A. Okay, everybody was given MP time for  
8 that week.

9 Q. MP?

10 A. That's correct.

11 Q. It's not reflected here.

12 A. It should be on there. It's an error.

13 Q. That would have been for that week,  
14 whatever it was, the 24th?

15 A. Right, the 24th through that Friday.

16 Q. The 31st was probably a Monday then.

17 A. Okay.

18 Q. You took a day off after the week?

19 A. I guess I did. I don't have any  
20 recollection of it.

21 Q. Does this help you recall?

22 A. No.

23 Q. You took the entire week off because  
24 of miscellaneous leave after the hurricane and  
25 then through the weekend you take off the

1 following Monday as a vacation day?

2 A. That doesn't sound right. It doesn't  
3 seem right. I'm almost positive I was back at  
4 work. We were working at that point thirteen days  
5 on with one day off. We were not allowed to take  
6 vacation time.

7 Q. Am I misreading this, or is it correct  
8 that you do not recall?

9 A. I do not recall.

10 Q. But it reflects an August 31st  
11 vacation day?

12 A. As best as I recall.

13 Q. Then October shows the 13th, 14th,  
14 15th, 16th, and 17th, and HP. What is that?

15 A. Home personal.

16 Q. There is no time limit on that; the  
17 company allows that?

18 A. The company allows that. That was  
19 when my father was in the hospital. He died that  
20 Sunday morning.

21 Q. This is October or September?

22 A. October.

23 Q. This is around your father's death?

24 A. Yes.

25 Q. What about the following?

1           A.     If you have a death in the family, you  
2     are allowed to take time off.

3           Q.     Now, November 2nd, vacation leave on  
4     the 2nd. Do you remember what that would have  
5     been for?

6           A.     I don't, no.

7           Q.     You drove to San Francisco. Was it  
8     about that time frame?

9           A.     No, that was later in November.

10          Q.     At this point in time, you have no  
11     recollection what that is?

12          A.     I do not.

13          Q.     November 20th it appears you took GP.  
14     That stands for what?

15          A.     That is an excuse day. It's a  
16     vacation day, another name for a vacation day.  
17     It's a personal day.

18          Q.     Do you recall what that might have  
19     been for?

20          A.     The trip to California.

21          Q.     The one day?

22          A.     That's probably a weekend in between.  
23     I probably threw out Friday and then was out.

24          Q.     What does IP stand for?

25          A.     IP is sick days. I came back. I had a



1 kidney infection.

2 Q. So you returned from San Francisco and  
3 you missed a couple of days?

4 A. That's correct, yes.

5 Q. Then you took another--

6 A. GP. That's the day after  
7 Thanksgiving, I believe. That was an office  
8 holiday. The whole office took a GP. I'm pretty  
9 sure that's the day after Thanksgiving.

10 Q. That would make those two days  
11 Thanksgiving that you took sick leave?

12 A. Yes -- no, that doesn't make sense.  
13 We get that day off anyway.

14 Q. This is around the return of your  
15 trip?

16 A. That is correct.

17 Q. On any of these trips you never took  
18 company time, it was always personal leave? You  
19 were never on the clock, so to speak?

20 A. I was never on the clock.

21 Q. December the 14th and 15th, do you  
22 recall what that might have been?

23 A. I have no idea. It could have been my  
24 daughter was sick or something like that. HP time  
25 is for home, family.



1 Q. Would it have appeared when the  
2 commissioner was there?

3 A. I don't think so.

4 Q. December 24th is Christmas Eve.

5 A. Right.

6 Q. You took a vacation day?

7 A. That's correct.

8 Q. Based upon your prior testimony, he  
9 came down right after Christmas?

10 A. That is correct.

11 Q. You took personal leave the last week  
12 of Christmas, or December?

13 A. Uh-huh.

14 Q. And in January of '93 you took off the  
15 15th, vacation time, and the 18th?

16 A. Right.

17 Q. Do you recall what that was?

18 A. That may have been Key West. Like I  
19 said, I am not totally sure. This is the past. I  
20 can't tell you for sure. I don't want to say  
21 that, but that may have been Key West.

22 Q. Was it for a four-day weekend or  
23 something?

24 A. It may have been, yes.

25 Q. And then February 26th you took a day

1 off of leave. Do you recall what that was?

2 A. That could have been Washington.

3 Q. Was that a three-day weekend for you,  
4 did you say?

5 A. I think I took Friday and Monday off,  
6 if I remember correctly.

7 Q. Is there a reason why it wouldn't  
8 reflect another day?

9 A. It may be May 1st.

10 February has how many days in it? If  
11 this is a Friday, this is Saturday, Sunday, and  
12 that's Monday.

13 Q. May 1st was probably a second vacation  
14 for Washington?

15 A. That's correct.

16 Q. And in April you took off the 5th,  
17 6th, 7th, 8th, and 9th. That was the St. George's  
18 trip?

19 A. That was the spring break.

20 Q. Spring break is in reference to your  
21 daughter's school year?

22 A. That's right.

23 MR. SALE: I think the record should  
24 be clear that the witness does not have any  
25 records in front of her showing precisely when

1 she took the different trips. She is doing her  
2 best to try and compare something in front of her  
3 with something she doesn't have, so it's her best  
4 recollection, which could be inaccurate on some  
5 dates.

6 BY MR. CURINGTON:

7 Q. Do you recall when the commissioner  
8 was down during the hurricane week what kind of  
9 hours he was keeping?

10 A. I have no idea. I mean he was on the  
11 phone a lot. He was gone a lot. At that point, I  
12 have no recollection of hours.

13 Q. Were you pretty much confined to your  
14 home because of the situation?

15 A. What do you mean, the first day? Yes,  
16 absolutely. After that, no.

17 Q. But did you basically stay at home?  
18 Were you fixing the house up or out doing other  
19 errands, or spending the majority of the time at  
20 home?

21 A. I was at home. My daughter was sick.  
22 I was at home. I had also gone down to my  
23 brother's house, which was pretty devastated.

24 Q. Do you have any recollection of  
25 whether the commissioner was making phone calls?



1 A. He was making a lot of phone calls.

2 Q. Late into the evenings, twenty-four  
3 hours a day? Did you notice his habits?

4 A. I would say they probably died down  
5 late in the evening. He was making a lot of phone  
6 calls.

7 Q. Do you recall approximately what time  
8 he was going to sleep at night or getting up in  
9 the morning?

10 A. I have no idea.

11 Q. Do you recall any morning when he was  
12 getting up with the rising sun, or you have no  
13 recollection?

14 A. I have no idea. He generally gets up  
15 pretty early. I have no idea.

16 Q. Would it be consistent with your  
17 recollection whether or not he worked eighteen  
18 hours in a day, for example?

19 A. I have no idea.

20 Q. You mentioned in a September of '92 a  
21 visit where he returned to Miami. :

22 A. Right.

23 Q. Do you recall when he arrived whether  
24 he flew?

25 A. I have no idea.



1 Q. You have no idea?

2 A. No.

3 Q. You don't recall whether he arrived in  
4 the morning, the afternoon?

5 A. I do not know.

6 Q. Did he ever comment to you about  
7 calling his secretary and checking in with her or  
8 making comments of that nature?

9 A. I know he did, because I know she  
10 called back and left messages on my answering  
11 phone. He doesn't know how to get into my  
12 answering phone. When I picked up the messages,  
13 if there was a message from her I had to relay it  
14 to him.

15 Q. During the hurricane period she was  
16 leaving messages on your recorder?

17 A. I don't know whether during the  
18 hurricane period, but I know she has. That's  
19 probably pretty accurate.

20 Q. Do you recall the nature of those?  
21 Was she returning his calls, or could you tell?

22 A. Sometimes yes, and sometimes she was  
23 saying, "Please have Tom call me."

24 Q. Do you recall whether Tom called his  
25 secretary at odd hours, and, if so, why?

1           A.     Tom calls his secretary a lot; on the  
2 weekends, all kinds of times. I have noticed  
3 that. She is very -- I don't know what the word  
4 is. She is very hard-working, obviously.

5           Q.     So, for example, it doesn't surprise  
6 you if the phone records indicated he called his  
7 secretary at ten o'clock at night?

8           A.     No, that wouldn't surprise me, no.

9           Q.     Did you participate in any of those  
10 conversations?

11          A.     Absolutely not. The only thing I did  
12 was possibly get a message from her, either that  
13 or pick the phone up and it was her and I would  
14 hand it to him.

15          Q.     Do you have any personal knowledge as  
16 to when he made trips whether he was personally  
17 buying the ticket versus the state buying the  
18 ticket for travel?

19          A.     I have no idea. I know there were  
20 times -- I know there were a lot of times he was  
21 here personally. I know there were times he was  
22 down on business.

23          Q.     Do you have knowledge as to how he  
24 paid for those trips?

25          A.     I don't have personal knowledge of

1 that. No, I did not see him buying the tickets.

2 Q. I am going to name a number of cities  
3 and ask you if this refreshes your recollection  
4 and whether not you saw the commissioner and  
5 visited him in any of these cities.

6 Did you see the commissioner in  
7 Newport, Rhode Island?

8 A. Absolutely not.

9 Q. Oklahoma City?

10 A. No.

11 Q. Little Rock?

12 A. No.

13 Q. Seattle?

14 A. No.

15 Q. Kissimmee?

16 A. No.

17 Q. Sanford?

18 A. No.

19 Q. Tampa?

20 A. I have seen the commissioner in Tampa.

21 Q. On what occasions did you see him in  
22 Tampa?

23 A. I have no idea exactly when it was.  
24 Last year at some point I had been to his parents'  
25 house.



1 Q. Have we discussed about that?

2 A. I don't think so.

3 Q. When do you think that might have  
4 been?

5 A. I know I saw him in Tampa. It was  
6 briefly after my father died, shortly after my  
7 father died.

8 Q. So after October?

9 A. That is correct.

10 Q. Was this a weekend visit?

11 A. Yes, it was.

12 Q. You spent the weekend in Tampa?

13 A. Yes, I did.

14 Q. How did you get to Tampa?

15 A. I got a ride from some friends who  
16 were happening to go that way.

17 Q. And you rode with them in the car both  
18 ways?

19 A. No, actually, Tom came back with me.  
20 We drove back together.

21 Q. In his car?

22 A. His parents' car.

23 Q. His parents' car?

24 A. Yes, uh-huh.

25 Q. So from Tampa to Miami you took his



1 parents' car?

2 A. That's correct.

3 Q. But you spent the weekend in Tampa?

4 A. Yes.

5 Q. Was it to visit his parents?

6 A. That's correct.

7 Q. Was there any business in Tampa that  
8 you know of?

9 A. Absolutely not, no, not that I am  
10 aware of, no.

11 Q. You didn't discuss any business?

12 A. No.

13 Q. Going back to the cities, St.  
14 Petersburg?

15 A. No.

16 Q. Sarasota?

17 A. No.

18 Q. Sebring?

19 A. No.

20 Q. Pensacola?

21 A. No.

22 Q. Live Oak?

23 A. No.

24 Q. San Antonio?

25 A. No.

1 Q. Atlanta?

2 A. He and I on the way to Washington met  
3 in Atlanta and then took a plane from Atlanta on  
4 to Washington and met at the airport.

5 Q. That was the four-day trip--

6 A. For the convention; that's absolutely  
7 right.

8 Q. Do you know if Commissioner Beard  
9 dated any other women working for Southern Bell  
10 or any other regulating company?

11 A. Not that I am aware of. I have seen  
12 the newspaper articles. From what I understand,  
13 Mary Dawdlin is his friend. They have worked on  
14 some issues together as far as NARUC goes. I know  
15 what I have read in the papers. That is all I  
16 know about it.

17 Q. Did he ever talk to you about any old  
18 girlfriends, breaking up, or any of that sort of  
19 thing in conversation?

20 A. He mentioned old girlfriends here and  
21 there.

22 MR. SALE: I will object unless it has  
23 to do with the area under inquiry. I think it is  
24 totally personal.

25 Do you intend to confine that to

1 Southern Bell or to regulatory matters?

2 BY MR. CURINGTON:

3 Q. Yes, in talking about old girlfriends  
4 or anything of that nature, did you ever talk  
5 about anyone working for a regulatory company?

6 A. Not that I can recall, no.

7 Q. Is it Mary Dawdlin?

8 A. Yes.

9 Q. Do you know her?

10 A. No, I don't.

11 Q. Have you ever met her?

12 A. No, I have not.

13 Q. Do you know who she is now?

14 A. Yes, I do.

15 Q. Has he ever talked about her?

16 A. Yes, he has.

17 Q. Did he ever talk as if he had dated  
18 her?

19 A. No. The impression I got was they  
20 were friends.

21 Q. And the impression was they did not  
22 date?

23 A. The impression was that they had  
24 dinner and there was a friendship, but I don't  
25 think it could be categorized as a girlfriend



1 type thing.

2 Q. A Platonic type of relationship?

3 A. That's correct, to the best of my  
4 knowledge.

5 Q. Have you ever talked to Mary Dawdlin?

6 A. No, I have not.

7 Q. On my list there is the city of  
8 Denver.

9 A. No, I have never been to Denver with  
10 Tom. I have never been in about ninety percent of  
11 those cities, period.

12 Q. How about New York City?

13 A. No.

14 Q. I have another whole sheet.  
15 Orlando?

16 A. No.

17 Q. Fort Myers?

18 A. I have been to Fort Myers Beach with  
19 him I believe at one point.

20 Q. Did you describe that? I think you  
21 did.

22 A. That may have been in September, the  
23 September visit. It's somewhere in there.

24 Q. That you went to Fort Myers?

25 A. Beach.



1 Q. Beach?

2 A. Right.

3 Q. I can't tell from my notes whether you  
4 described it or not. That was a trip with just  
5 you and he, a personal trip?

6 A. Yes, that's right.

7 Q. How did you get there?

8 A. We drove my car.

9 Q. And you returned in your car?

10 A. That's correct.

11 Q. How did he get there?

12 A. In my car.

13 Q. From Miami? You both left from Miami  
14 and went to Fort Myers Beach and came back to  
15 Miami?

16 A. Yes.

17 Q. Do you think that was probably in  
18 September or thereabouts?

19 A. It was somewhere in there. I hate to  
20 say that because I really can't be sure.

21 Q. Boulder, Colorado?

22 A. No.

23 Q. You have never seen Mary Dawdlin face  
24 to face?

25 A. She was at the NARUC convention, I

1 believe.

2 Q. In Washington, D.C.?

3 A. That's correct.

4 I have never met her. I have never  
5 talked to her.

6 Q. That was in February?

7 A. That's the only one I have ever been  
8 to.

9 Q. She was pointed out to you across the  
10 room?

11 A. I don't remember. At some point she  
12 may have said hello to Tom and Tom said, "That's  
13 Mary Dawdlin." End of conversation.

14 Q. But you weren't introduced?

15 A. No, we were not.

16 Q. Do you think you might have seen her  
17 anywhere else?

18 A. No, I don't think so.

19 Q. Did you hear her name much in the  
20 business in terms of whether Mr. Lombardo or  
21 anyone else from the company dealt with her or--

22 A. I have never heard of her before.

23 Q. Never?

24 A. Never.

25 Q. Have you discussed your relationship

1 with Commissioner Beard with Elise?

2 A. Sure.

3 Q. Sort of girl talk or whatever? I  
4 don't know.

5 A. Sure it's girl talk. Yes, I guess. I  
6 don't know how men talk, so I guess it's girl  
7 talk.

8 (Discussion held off the record)

9 MR. CURINGTON: I apologize for that  
10 comment or that question. If I offended anyone, I  
11 did not mean that to be a chauvinistic statement.  
12 I think it was meant to be more generic  
13 terminology.

14 BY MR. CURINGTON:

15 Q. Did you understand the nature of the  
16 question?

17 A. I guess, yes.

18 MR. SALE: We can translate it into  
19 nonbusiness talk.

20 THE WITNESS: Yes, it was nonbusiness  
21 talk.

22 BY MR. CURINGTON:

23 Q. You mentioned earlier the helicopter  
24 ride that the commissioner took after the  
25 hurricane. Do you know who participated in that



1 ride?

2 A. I have no idea. I just know he  
3 mentioned they had flown down over South Florida  
4 and it was very, very bad.

5 Q. This is something he discussed with  
6 you after coming back from the ride or--

7 A. Well, I know he was going to go and  
8 take a helicopter ride. When he came back, he was  
9 telling me how devastated the area was.

10 Q. This was within days after the  
11 hurricane?

12 A. Yes.

13 Q. You didn't go on the ride?

14 A. No, I did not.

15 Q. Did anybody else from the company go,  
16 that you know of?

17 A. Not that I am aware of, no.

18 Q. Do you know a Mister -- I don't know  
19 how to pronounce it. He's from Argentina. It's  
20 spelled M-a-t-t-a-u-s-c-h.

21 A. I do not.

22 Q. Mattausch.

23 Did he ever talk about meeting with  
24 someone from Argentina in your presence?

25 A. Not that I can recall, no.



1 Q. I'm trying to save some time. A lot  
2 of these things have been answered in prior  
3 testimony.

4 Are you aware of any phone calls the  
5 commissioner may have made from your home to  
6 Chiles Communications?

7 A. I have no idea. I really do not know  
8 who the commissioner called from my home.

9 Q. Did you see any other commissioners on  
10 that St. George trip?

11 A. Absolutely not.

12 Q. Did you ever visit with the  
13 commissioner in Naples or had seen him there?

14 A. No. We drove to Naples on the way to  
15 Fort Myers Beach, but we didn't stop.

16 Q. Did you see the commissioner in  
17 Birmingham? You mentioned two visits to  
18 Birmingham.

19 A. I have never seen him in Birmingham.

20 Q. Did you see him on the trips to and  
21 from Birmingham?

22 A. No, I did not.

23 Q. Did you stop in Tallahassee on one of  
24 the trips to Birmingham?

25 A. Yes, I did.

1 Q. You did not see the commissioner?

2 A. I did not see him, no.

3 Q. What was the purpose of your stop in  
4 Tallahassee?

5 A. To see Elise.

6 Q. To see Elise?

7 A. Uh-huh.

8 Q. Did you spend some time there on that  
9 stop?

10 A. Yes.

11 Q. Was it just one day or two?

12 A. I believe so.

13 Q. But you did not see the commissioner  
14 on that stop?

15 A. No, I did not.

16 Q. Going back to the Washington, D.C.,  
17 meeting, you mentioned a social occasion where  
18 you mentioned three other PSC members.

19 A. Yes.

20 Q. You attended a meeting designated for  
21 PSC staff only?

22 A. Absolutely not. I did not attend any  
23 meeting.

24 Q. The only meeting you went to was that  
25 one social gala?

1 A. That is correct.

2 Q. The trips to Birmingham were Southern  
3 Bell trips, paid for through company expenses and  
4 so on?

5 A. That's correct.

6 Let me clarify that for you.

7 That Tallahassee stop-off I paid for  
8 myself. That should be reflected on the voucher.

9 Q. What was the purpose of those trips?

10 A. One I believe was to attend MTR  
11 coordinating training. The other one I was  
12 filling in for an assistant manager in the  
13 office. It was beyond the call of a trainer's  
14 training.

15 Q. I take it from the travel vouchers  
16 Southern Bell has some sort of dormitory  
17 available?

18 A. Yes.

19 Q. The highlight of your trip, huh?

20 A. Yes, it's lovely.

21 On one of them I did not stay there.  
22 I lucked out. It was booked when I called.

23 Q. Is that something they own or they  
24 just have an arrangement?

25 A. They own it.



1 Q. Is Birmingham a center for training,  
2 or what?

3 A. I don't know if you would call it a  
4 center for training. It's one of the cities that  
5 we have a lot of buildings in.

6 Q. I'm going to direct your attention now  
7 to the burglary incident during the St. George  
8 trip.

9 A. Yes.

10 Q. My understanding is you were in St.  
11 George from April 6th to the 10th. Does that  
12 sound right?

13 A. That sounds right.

14 Q. You returned to Tallahassee and notice  
15 the commissioner's house had been burglarized?

16 A. That is correct.

17 Q. Tell me what you recall of that  
18 incident.

19 A. Well, we did not notice that the house  
20 had been entered. There was no forced entry that  
21 you could see. We got home. They were washing  
22 the cars out in the driveway. I went to hang  
23 something up in the closet. I noticed at that  
24 point my clothes were gone. So, at that point I  
25 said, "Tom, do you know who could have moved my



1 clothes?" He said, "I have no idea." At that  
2 point, we started looking through the house. We  
3 realized someone had been in the house. We had a  
4 pretty good idea what had happened.

5 Q. As it turns out, it was his ex-wife?

6 A. We suspected that from the beginning,  
7 yes.

8 Q. We don't know necessarily at this  
9 point?

10 A. She has confessed.

11 Q. Has she remarried?

12 A. No, she has not.

13 Q. There is a reference in the police  
14 report to a Mr. Hart. Is that a typo? Is that  
15 her father, or do you know anything about that?

16 A. I imagine it's her father. I don't  
17 know.

18 Q. Do you know anything about the files  
19 that were removed from his home?

20 A. Yes, I do.

21 Q. Do you know what the contents of any  
22 of those files were?

23 A. I know she took American Express  
24 records and telephone records. I don't know what  
25 else. I know quite a few of his files were

1 missing.

2 Q. Were those his personal American  
3 Express?

4 A. Yes, that's correct, they were  
5 personal.

6 Q. Do you know if there were any office  
7 files that were removed?

8 A. I have no idea. I wouldn't be  
9 surprised. She took quite a bit of stuff.

10 Q. Does the commissioner keep office  
11 materials at home?

12 A. I really don't know. I wouldn't be  
13 surprised if he did. I have never seen any office  
14 files. I have seen that he has a file cabinet,  
15 but what is in there, I have no idea.

16 Q. Have you and the commissioner ever  
17 talked about what he is going to do after his term  
18 expires?

19 MR. SALE: Can we just have a moment,  
20 please?

21 (Discussion held off the record)

22 MR. SALE: They obviously have spoken  
23 about a lot of things of a personal nature.

24 Can you rephrase the question and  
25 specify something particularly, because we are

1 going to again suggest it is inappropriate to ask  
2 what their personal plans are, whether they are  
3 planning vacations together or things along those  
4 lines.

5 MR. CURINGTON: The area I want to  
6 inquire into is whether or not they have  
7 discussed his future plans, whether or not there  
8 are people who are assisting him in trying to find  
9 placement and who those people are.

10 MR. KUEHNE: His future professional  
11 plans as opposed to his personal plans?

12 MR. CURINGTON: Yes, yes.

13 MR. KUEHNE: We need a minute.

14 (Thereupon, a brief recess was taken  
15 during which the Deponent, Mr. Sale, Mr.  
16 Curington, Mr. Anthony, and Ms. Milton exited the  
17 deposition room, after which they returned and  
18 the following proceedings were had:)

19 MR. CURINGTON: Can you read the  
20 question back.

21 (Thereupon, the preceding question was  
22 read back by the court reporter.)

23 MR. CURINGTON: That was meant in the  
24 job context.

25 MR. SALE: The general position we are



1 going to take is we will not object to the witness  
2 responding to any knowledge she may have of any  
3 contact with Southern Bell or with any other  
4 regulated industry in connection with present or  
5 future employment, but we will object and  
6 instruct her not to discuss personal discussions  
7 they may have had about what someday people may  
8 want to do in a general sense, but we will allow  
9 her to answer anything which could suggest any  
10 improper conduct, which we think she will tell  
11 you there wasn't any.

12 BY MR. CURINGTON:

13 Q. Have you discussed his future job  
14 prospects?

15 A. We have discussed life after the PSC,  
16 yes.

17 Q. Including possible job alternatives?

18 A. That's correct.

19 Q. Do those job alternatives include jobs  
20 dealing with regulated industries or regulatory  
21 bodies?

22 A. They did not deal with Southern Bell.

23 Q. Do they deal with any other regulated  
24 companies?

25 MR. SALE: Do you understand?



1 THE WITNESS: Yes, I understand,  
2 but--

3 BY MR. CURINGTON:

4 Q. Did he ever talk about, for example,  
5 that he wanted a job with Florida Power & Light?  
6 Did he talk about any other companies he wanted to  
7 work for?

8 A. No, no, no.

9 Q. Regulated companies.

10 A. No.

11 Q. Did he ever talk about going to work  
12 for some other regulatory body?

13 A. I don't understand.

14 Q. Some federal regulatory body.

15 A. No, he did not.

16 Q. The Federal Communications Commission?

17 A. No.

18 Q. He has never talked about that?

19 A. Well, at one point the FCC had come  
20 up, yes.

21 Q. And you and he discussed it?

22 A. He said he was interested in the  
23 possibility, that's all.

24 Q. Did you ever talk about any efforts of  
25 anyone acting on his behalf to assist him in any

1 of those job possibilities?

2 A. Absolutely not, no.

3 Q. Did he ever talk about whether or not  
4 he would like Southern Bell's help in a job?

5 A. No, absolutely not.

6 Q. Did he ever talk about getting  
7 anyone's assistance in his job hunt, letters of  
8 recommendation or referrals?

9 A. No.

10 Q. Do you know what National Consulting  
11 Network is?

12 MR. KUEHNE: Do we need to talk?

13 THE WITNESS: Yes.

14 MR. KUEHNE: We need to take a break.

15 (Thereupon, the Deponent, Mr. Sales,  
16 Mr. Kuehne, Mr. Anthony, and Ms. Milton exited  
17 the deposition room, after which they returned  
18 and the following proceedings were had:)

19 MR. SALE: Do you want to read the  
20 question back.

21 (Thereupon, the preceding question was  
22 read back by the court reporter.)

23 MR. KUEHNE: Our position with regard  
24 to questions of potential plans of Tom Beard is  
25 the following: Alma will answer any questions

1       responding to whether she is aware of Tom Beard  
2       having any plans involving a regulated industry,  
3       including Southern Bell, whether within or  
4       without Florida, and whether he has consulted  
5       with people from a regulated industry to assist  
6       him in future plans, but that is the extent of her  
7       discussion.

8               If it does not involve a regulated  
9       industry, somebody from a regulated industry, she  
10      is not going to discuss her personal nonbusiness  
11      conversations with Tom Beard.

12      BY MR. CURINGTON:

13           Q.     With that limitation, do you know what  
14      the National Consulting Network is?

15               MR. KUEHNE: That is something we are  
16      instructing Alma not to answer.

17               MR. CURINGTON: What is the basis of  
18      that instruction? Is it privileged? Is it  
19      oppressive? Is it harassing?

20               MR. KUEHNE: If her knowledge of  
21      National Consulting Network comes from personal  
22      conversations with Tom Beard and not involving  
23      discussions about a regulated industry or people  
24      who work for regulated industry, we believe that  
25      is private. It is a private communication of a



1 nonbusiness nature between Alma and Tom Beard.  
2 We are advising our client that under the  
3 constitutional right to privacy her private  
4 communications may not be divulged, particularly  
5 since you set out the parameters of this  
6 deposition advising that the purpose of the  
7 deposition is to determine whether Tom Beard  
8 should, as I noted, sit on PSC matters regarding  
9 Southern Bell.

10 MR. CURINGTON: I think you fully  
11 appreciate the objections to relevancy aren't a  
12 basis to instruct a witness not to answer. I  
13 think under the Rules of Procedure you can  
14 instruct the witness not to answer if it is  
15 privileged, if you contend my questioning is  
16 oppressive or needlessly annoying. If that's not  
17 the basis, I think you are improperly instructing  
18 the witness not to answer.

19 MR. SALE: I would say it is  
20 oppressive, needlessly annoying, and invades her  
21 privacy, and might also be based upon  
22 unconstitutionally seized evidence.

23 BY MR. CURINGTON:

24 Q. Can you tell me whether the National  
25 Consulting Network has anything to do with



1 consulting regarding regulated industry?

2 A. It does not.

3 Q. Can you tell me if it's a network that  
4 the commissioner has a financial interest in?

5 MR. KUEHNE: If you know.

6 THE WITNESS: He has an interest in  
7 it.

8 BY MR. CURINGTON:

9 Q. Is this a business, an existing  
10 business?

11 A. No, it is not.

12 Q. Is it a proposed business or a  
13 possible business?

14 MR. SALE: Wait.

15 MR. KUEHNE: Based on the previous  
16 instruction, unless your question pertains to  
17 National Consulting Network and some relationship  
18 to an existing regulated industry or people who  
19 work for a regulated industry, we maintain that  
20 is an intrusion into Alma's personal affairs and  
21 personal private communications, which is  
22 protected, whether a privileged basis or a  
23 constitutional basis. It depends on how one  
24 analyzes it.

25 MR. CURINGTON: Are you instructing

1 her not to answer it?

2 MR. KUEHNE: Yes.

3 BY MR. CURINGTON:

4 Q. Is National Consulting Network an  
5 existing entity?

6 A. No, it is not.

7 Q. Do you have any financial interest in  
8 National Consulting Network?

9 A. No, I do not.

10 Q. Does Commissioner Beard have any  
11 financial interest in National Consulting  
12 Network?

13 (Discussion out of the hearing of the  
14 court reporter between the Deponent and Mr.  
15 Kuehne, after which the following proceedings  
16 were had:)

17 THE WITNESS: May I talk with you?

18 MR. KUEHNE: Excuse me.

19 (Thereupon, the Deponent, Mr. Sale,  
20 Mr. Kuehne, Mr. Anthony, and Ms. Milton exited  
21 the deposition room, after which they returned  
22 and the following proceedings were had:)

23 MR. SALE: Would you reread the  
24 question.

25 (Thereupon, the preceding question was

1 read back by the court reporter.)

2 MR. SALE: She will answer.

3 THE WITNESS: Not to my knowledge.

4 BY MR. CURINGTON:

5 Q. As I understand your earlier  
6 testimony, he has some interest in it. Do you  
7 know what the nature of his interest is?

8 MR. KUEHNE: Did you want to clarify  
9 that response when you said he had an interest in  
10 it?

11 MR. CURINGTON: Let's not coach the  
12 witness.

13 THE WITNESS: Well, yes, I wanted to.  
14 I meant he has no financial interest  
15 in it, to my knowledge.

16 BY MR. CURINGTON:

17 Q. Do you know what kind of an interest  
18 he has, if any?

19 MR. KUEHNE: If you know.

20 THE WITNESS: I am not really sure.

21 BY MR. CURINGTON:

22 Q. But you have no interest in it?

23 A. I have no interest in it I know.

24 Q. Do you know what National Consulting  
25 Network involves, whether or not it involves any



1 regulated industry?

2 A. To my knowledge, it does not involve  
3 any regulated industry, no.

4 Q. Whatever the Consulting Network may  
5 be, to your knowledge, it doesn't involve  
6 consulting for regulated industry?

7 A. To my knowledge, no.

8 Q. Do you have any idea what the  
9 consulting might involve?

10 A. Not really, no.

11 Q. Do you know what TMB Associates is?

12 A. I'm not sure.

13 Q. Do you know if TMB stands for Thomas  
14 Malcolm Beard?

15 A. I don't know.

16 Q. Do you know if it is an existing  
17 entity or an ongoing business?

18 A. Not to my knowledge, no.

19 Q. Do you know if it has anything to do  
20 with regulated industry?

21 A. Not to my knowledge, no.

22 Q. Have you and the commissioner ever  
23 talked about TMB Associates?

24 A. He may have mentioned it.

25 Q. What do you recall of that



1 conversation?

2 MR. SALE: Our position with regard to  
3 an entity which may or may not be called TMB  
4 Associates, which the witness has already said  
5 she is unaware of what that is, is the same: If  
6 she knows it to be regulated industry or people  
7 from regulated industry, we believe the question  
8 is permissible; otherwise, we believe it is of a  
9 private matter to the extent of her knowledge and  
10 not subject to be answered by the witness.

11 MR. CURINGTON: Are you instructing  
12 her not to answer?

13 I disagree with your objections and  
14 reserve the right to compel if that becomes an  
15 issue.

16 BY MR. CURINGTON:

17 Q. With that caveat, do you know if it  
18 has anything to do with regulated industry?

19 A. Not to my knowledge, no, it does not.

20 Q. These questions are coming from the  
21 police report from that burglary. They reference  
22 missing files. They also mention a file that is  
23 abbreviated BIO, which I assume means "biograph,"  
24 his resume or vitae.

25 Did the commissioner represent to you

1 his resume was missing or anything of that  
2 nature?

3 A. He did not mention it to me.

4 Q. Do you know if it was?

5 A. I have no idea.

6 Q. Does he have a biographical sketch or  
7 something?

8 A. I don't know that. It wouldn't  
9 surprise me if he did.

10 Q. Do you know what "the project" refers  
11 to, what file that might be?

12 A. I have no idea.

13 Q. Did he ever discuss the project with  
14 you?

15 A. I don't believe so, no. I'm not  
16 really quite sure what the project is.

17 Q. There is another police report  
18 involving your friend Elise -- again, I  
19 apologize, I don't know how to pronounce it --  
20 N-i-v-i-c-a--

21 A. Nivica.

22 Q. Nivica

23 --involving malicious mischief, the  
24 incident having occurred on November 8 of '92.  
25 Are you familiar with that incident?

1 A. Yes, I am.

2 Q. Can you tell me what you know of that?

3 A. Tom's ex-wife was calling Elise on the  
4 phone and asking for me, calling at two or three  
5 in the morning whispering. The next morning  
6 Elise went out to her car and someone had written  
7 with lipstick on the window of the car. They were  
8 pretty sure it was Tom's ex-wife.

9 Q. My understanding is written on the  
10 windows were the letters "SBW"?

11 A. That's correct.

12 Q. Do you know what that stands for?

13 A. I have no idea.

14 Q. Did anybody discuss this with you,  
15 either Elise or the commissioner, having any idea  
16 of what that might stand for?

17 A. We assumed "SB" was Southern Bell.  
18 The ex-wife was threatening to go to the media and  
19 make it appear we were doing things we weren't  
20 doing or doing things wrong. This was going on  
21 for quite a while. We are assuming that refers to  
22 Southern Bell. That's just an assumption.

23 Q. SBW?

24 A. I don't know what the "W" refers to.  
25 We just assumed "SB" was Southern Bell.



1 Q. Do we know this was done by his  
2 ex-wife?

3 A. Elise has had no other problems in  
4 Tallahassee. His ex-wife was calling at that  
5 time harassing her, hanging up on her, asking for  
6 me, and as I said, she had called me and Tom also  
7 and said that she was going to call the media and  
8 tell them that we were doing inappropriate  
9 things, that she was going to ruin Tom, et cetera.

10 Q. Has she been charged with this; do you  
11 know?

12 A. I don't know if she has been charged  
13 with that. I don't know.

14 Q. It also refers to threatening phone  
15 calls. Was Elise ever threatened by this caller?

16 A. I can't remember exactly what she said  
17 to Elise. She threatened me, so I wouldn't be  
18 surprised if she threatened Elise.

19 Q. The ex-wife threatened you?

20 A. Yes.

21 Q. How did she threaten you?

22 A. She told me she was going to find me.  
23 She quoted my address to me. She told me that I  
24 couldn't hide from her. She told me she was going  
25 to find my daughter. She told me she was going to



1 the media and ruin Tom and make it look like Tom  
2 and I had been passing things back and forth and  
3 she was going to ruin him.

4 No, Tom and I have not done anything  
5 wrong. She was just bent on making it look that  
6 way.

7 Q. Were you there when the police officer  
8 came to fill out this report?

9 A. No, I was not.

10 Q. Elise says -- or according to this  
11 officer, that she advised the officer she and you  
12 are business associates of Commissioner Beard.  
13 Were you aware of that?

14 A. I was not aware of that statement, no.

15 Q. Do you have any idea why she might  
16 refer to you as a business associate of  
17 Commissioner Beard?

18 MR. ANTHONY: Assuming the police  
19 report is accurate.

20 THE WITNESS: That is totally  
21 inaccurate. That may have been the officer. I  
22 don't think Elise would say that.

23 BY MR. CURINGTON:

24 Q. I am just reading from the police  
25 report.

1           A.     Elise is very aware that I am not a  
2 business associate of Tom Beard's. I don't think  
3 Elise would refer to me that way.

4           Q.     This may not be an accurate report. I  
5 am not vouching for its accuracy.

6           A.     No, I understand.

7           Q.     I guess this is consistent with your  
8 earlier statement that his ex-wife stated to you  
9 that Southern Bell can't hide you, that you're  
10 going to pay, that type of threat?

11          A.     That's correct.

12          Q.     Did this caller threaten Elise, too,  
13 or do you know?

14          A.     I can't remember exactly. I do know  
15 she was calling in the middle of the night  
16 whispering and asking if I was there and just  
17 saying her name over and over. I really can't  
18 remember beyond that what else she may have done.

19          Q.     Were you in Tallahassee when this  
20 incident occurred this November 8?

21          A.     I believe I was, yes. ,

22          Q.     If I could ask you to clarify, do you  
23 have a designated phone number at your office?

24          A.     My line is 5404. That is what is  
25 known as officially my line.

1 Q. It's 530--

2 A. 5404.

3 Q. And that is your line?

4 A. That's correct.

5 Q. You said earlier Mr. Seymour's number  
6 is 5403?

7 A. Mr. Seymour has 5400, 541, 542, and 3.

8 Q. Are there more numbers? That's on a  
9 rotary, I take it?

10 A. His is on a rotary.

11 Q. Yours is not?

12 A. No, it is not.

13 Q. Are there other numbers when referring  
14 to your office?

15 A. Sure. There are twenty-five or thirty  
16 lines in our office.

17 Q. As I understand your prior testimony,  
18 basically anyone in that office would have access  
19 to your desk and could have made phone calls and  
20 vice versa?

21 A. Sure.

22 Q. We can't tell who originated those  
23 phone calls from these phone records?

24 A. No, you cannot.

25 Q. I think we are winding down here, if



1 you will bear with me.

2 Just for clarity, in terms of the  
3 commissioner's future job-hunting prospects or  
4 whatever, has he ever mentioned whom he might  
5 seek assistance from in terms of either  
6 references or recommendations or even someone  
7 putting in a good word for him in terms of  
8 applying for any job?

9 A. No, he has never said anything about  
10 that.

11 Q. Has anybody at Southern Bell, Mr.  
12 Lombardo or anyone, said that they would trying  
13 to assist the commissioner in his job hunt of any  
14 nature?

15 A. Absolutely not.

16 Q. Has Commissioner Beard offered to  
17 assist you in your career in any way at Southern  
18 Bell?

19 A. Absolutely not.

20 Q. Have you discussed with him your  
21 career with Southern Bell?

22 A. Absolutely not.

23 Q. Did you and Commissioner Beard talk  
24 about your potential deposition today?

25 A. In general terms. He knew it was



1       happening today, yes.

2               Q.     What did you discuss?

3               A.     That it was going to go today at  
4       eleven a.m.

5               Q.     What else was said?

6               A.     He just told me to tell the truth,  
7       that's it, and, "Good luck!"

8               Q.     Nothing else was said?

9               A.     No.

10              Q.     Once your dating relationship or  
11       whatever, social relationship, with the  
12       commissioner was made known to Southern Bell, did  
13       any Southern Bell employee explicitly sit you  
14       down and say that you cannot discuss business  
15       matters with Commissioner Beard?

16              A.     I already knew that. Hank and I  
17       talked about that. I informed Hank I was well  
18       aware of my responsibilities.

19              Q.     And other than that?

20              A.     No.

21              Q.     As an individual, would you see any  
22       impropriety in a commissioner dating an employee  
23       of another regulated industry?

24                   MR. SALE: I object to that. I don't  
25       think she is competent to answer that.

1 BY MR. CURINGTON:

2 Q. Do you have an opinion?

3 Let me ask you, if you heard a  
4 commissioner was dating -- I don't know what your  
5 power company is down here -- Florida Power &  
6 Light?

7 A. Yes.

8 Q. --if a commissioner was dating an  
9 employee of Florida Power & Light, would that  
10 bother you as a rate payer?

11 A. I would look at the commissioner's  
12 voting record and if he was voting along the same  
13 lines as he always has, I don't see what  
14 difference it makes if he is a fair and impartial  
15 person. If I saw favoritism, it might be  
16 different, but if he is fair and impartial, I  
17 don't see what difference it makes.

18 Q. Your opinion is based upon his voting  
19 record in reference to his relationship?

20 A. I have to say there is no -- this is  
21 private life. As long as you are keeping your  
22 private life and your business responsibilities  
23 separated, there is no problem.

24 Q. So back to my hypothetical.

25 As a rate payer, that wouldn't bother

1       you?

2           A.       It would not bother me.

3           Q.       Would it bother you if you were a  
4       party to a litigation and the judge were dating  
5       the other side in the litigation? Would that  
6       bother you?

7           MR. SALE: I object to this. This  
8       sounds like the type of thing in the media,  
9       hypotheticals, and I object to that.

10          MS. WILDA WHITE: We appreciate the  
11       acknowledgment.

12          MR. CURINGTON: Are you instructing  
13       her not to answer?

14          MR. SALE: We are instructing her not  
15       to answer.

16          MR. CURINGTON: On what basis?

17          MR. SALE: It's totally speculative.  
18       She has no competency to answer that question.  
19       Answering a question like that is just doing down  
20       a path which has no end. I understand you reserve  
21       your right to litigate it.

22          MR. CURINGTON: Yes.

23       BY MR. CURINGTON:

24           Q.       Did Commissioner Beard ever explain to  
25       you that he was going to or why he was going to,



1 if he was, talk to Southern Bell people about your  
2 relationship?

3 A. Absolutely. His ex-wife was  
4 threatening to go to the media. She was going to  
5 make it look like we were doing all these things  
6 that we weren't doing. At that point he felt he  
7 should Joe Lacher because he didn't feel it was  
8 right.

9 Q. In response to those threats or  
10 concerns, he went and disclosed it himself?

11 A. That is correct.

12 Q. He told you he was going to do that?

13 A. That is correct.

14 Q. Did he ever talk to you about whether  
15 or not he was going to disclose that to other  
16 commissioners or the staff of PSC?

17 A. He did not discuss that with me, no.

18 Q. Do you have an opinion as to whether  
19 or not he should have disclosed that to the  
20 commission?

21 MR. SALE: The same objection and the  
22 same instruction as to her opinion whether or not  
23 he should have.

24 MR. CURINGTON: John, are you saying  
25 she is not qualified to tell her opinion?



1 MR. SALE: You can ask her opinion  
2 about anything in the world. Her opinion doesn't  
3 make any difference.

4 MR. CURINGTON: As to relevance.  
5 John, you know darn well that goes to relevance.

6 MR. KUEHNE: The witness certainly can  
7 answer the question if she has an opinion.

8 Have you formed an opinion, Ms.  
9 Paruolo?

10 THE WITNESS: What is the question?

11 BY MR. CURINGTON:

12 Q. Do you have an opinion the  
13 commissioner should have disclosed your  
14 relationship to other members of the commission  
15 or to the PSC staff?

16 A. That's his personal life. I don't  
17 think he has to tell his personal life.

18 Q. So your opinion is no?

19 A. It's his personal life and his private  
20 business.

21 Q. Should he have disclosed it to the  
22 commission, yes or no?

23 A. About his private life? No, I don't  
24 think he should disclose his private life to the  
25 commission.

1 Q. That's all I am asking for, a  
2 straightforward answer. Okay.

3 A short while ago we discussed a  
4 number of cities. I asked you whether or not you  
5 had traveled or seen the commissioner there.

6 A. Right.

7 Q. Generally, do you recall receiving any  
8 phone calls from the commissioner other than from  
9 Tallahassee? Did he call you from other cities  
10 like Washington or San Diego or Seattle or Denver  
11 or Boulder?

12 A. Sure.

13 Q. Can you recall you what cities he  
14 called you from?

15 A. I have no idea.

16 Q. To the best of your recollection, what  
17 comes to mind? Or if you can name the event he  
18 was calling from, maybe that will help.

19 A. The events are even more -- he called  
20 me from Washington.

21 Q. D.C.?

22 A. Yes, uh-huh.

23 I believe he called me from Seattle.  
24 Beyond that, I don't know.

25 Q. Do you recall if he ever called you

1 from Atlanta?

2 A. I have no idea.

3 Q. Birmingham?

4 A. I have no idea.

5 Q. Washington?

6 A. Washington, D.C., yes.

7 Q. Denver?

8 A. I have no idea.

9 Q. Orlando?

10 A. I don't know.

11 Q. Fort Myers?

12 A. Don't know.

13 Q. Newport, Rhode Island?

14 A. Don't know.

15 Q. Oklahoma City?

16 A. Don't know.

17 Q. Little Rock?

18 A. I don't know.

19 Q. Kissimmee?

20 A. I don't know.

21 Q. Sanford?

22 A. I have no idea.

23 Q. Sarasota?

24 A. I have no idea.

25 Q. St. Pete?



- 1 A. I have no idea.
- 2 Q. Pensacola?
- 3 A. I have no idea.
- 4 Q. San Antonio?
- 5 A. No idea.
- 6 Q. Los Angeles?
- 7 A. He called me from Los Angeles.
- 8 Q. Boston?
- 9 A. No idea.
- 10 Q. Boulder?
- 11 A. No idea.
- 12 Q. Whenever he did call you from those
- 13 places, it was personal?
- 14 A. Absolutely.
- 15 Q. Do you know if Commissioner Beard was
- 16 making calls to Elise? I apologize for the
- 17 informality. It's to avoid the pronunciation of
- 18 the last name. Do you know if he was making phone
- 19 calls to Elise for business reasons--
- 20 A. No.
- 21 Q. --since you have met him?
- 22 A. Not to my knowledge, no.
- 23 Q. Your attorney has been quoted as
- 24 saying you have management responsibilities.
- 25 Would you agree with that?



1           A.     Yes, I would say that's low level  
2 management responsibility.

3           Q.     Do you have any financial investment  
4 or arrangements with the commissioner,  
5 Commissioner Beard?

6           A.     Absolutely not.

7           Q.     No business partnerships or corporate  
8 things?

9           A.     No, none.

10          Q.     Does Elise actively participate in  
11 matters before the PSC?

12          A.     Not that I am aware of, no.

13          Q.     She works in that regulatory division?

14          A.     Yes, she does.

15          Q.     Do you know what her job duties are?

16          A.     Not really, no.

17          Q.     You testified earlier that you  
18 routinely saw I guess the people in the executive  
19 suite or whatever. Are you on a first-name basis  
20 with most of those people, or is it more formal?

21          A.     Everybody is on a first-name basis  
22 there. It's very informal.

23          Q.     If you were speaking to the president,  
24 how would you address him?

25          A.     Most people call him Mr. Lacher.

1 Q. Do you have any sort of a pay  
2 incentive plan? Are you eligible for bonuses or  
3 things of that nature?

4 A. Yes, I am.

5 Q. What criteria do they use for bonuses?

6 A. Your performance for the year.

7 Q. Evaluations, basically?

8 A. Yes.

9 Q. Is there a company policy on that  
10 that's in writing?

11 A. I am sure there is.

12 Q. But that's an evaluation as opposed  
13 to, say, productivity, like marketing for the  
14 number of sales?

15 A. Different departments have different  
16 programs. I am sure marketing has one based on  
17 your sales.

18 Q. What is yours based on?

19 A. Performance.

20 Q. Is it a qualitative measure or is  
21 there any quantitative?

22 A. No, it's not quantitative, it's  
23 qualitative.

24 Q. So it's a very subjective evaluation?

25 A. It's very subjective, yes, it is.

1 Q. Have you received bonuses in the last  
2 year or two--

3 A. No, I did not.

4 Q. --or the last four years?

5 A. No, I did not get a bonus for 1992.

6 Q. In the last four years when you got  
7 your outstanding ratings?

8 A. No. Actually, the way the pay plan  
9 reads is this is the first year I would have been  
10 eligible. '92 is the first year I would have been  
11 eligible for a bonus due to my pay rate.

12 Q. Bonuses are paid at the end of the  
13 fiscal year or the calendar year?

14 A. In March of '93 we got the bonus for  
15 '92.

16 Q. Is your fiscal year a calendar year?

17 A. That's correct.

18 Q. So it was for your evaluation through  
19 December?

20 A. That's correct.

21 Q. You would have been eligible in March  
22 for a bonus if you had gotten one, but you did  
23 not?

24 A. I did not get one.

25 MR. CURINGTON: Thank you. I have no



1 other questions.

2 THE WITNESS: Okay, thank you.

3 (Thereupon, a recess was taken, after  
4 which the following proceedings were had:)

5 BY MR. BECK:

6 Q. Ms. Paruolo, my name is Charlie Beck  
7 with the Office of the Public Counsel. As we go  
8 through this, if you have any questions or don't  
9 understand what I am asking, please stop me so we  
10 can get it straight before going into it.

11 A. Okay.

12 Q. You mentioned earlier you are now  
13 working for David Seymour?

14 A. Yes.

15 Q. You are a staff assistant?

16 A. That is correct.

17 Q. Would that also be properly titled  
18 staff assistant manager?

19 A. No, it's a staff assistant.

20 Q. Are there other staff assistants who  
21 work for Mr. Seymour?

22 A. No, there are not.

23 Q. Is there anybody else who reports  
24 directly to Mr. Seymour?

25 A. Yes, there are.



1 Q. Who else?

2 A. Managers, different managers.

3 Q. Could you briefly describe who those  
4 managers are and what positions they hold?

5 A. Pat Childs reports to Mr. Seymour. He  
6 is a manager in forecasting. Luis Quintero. Luis  
7 Quintero reports to Mr. Seymour. He is a manager  
8 in forecasting. Dorothy Bennett is a manager in  
9 industry relations. And Ed Prieto is a manager in  
10 industry relations. And Katie DeBrown and Loma  
11 Perks, they are assistant managers. They are  
12 Pioneer administrators. They all report directly  
13 to Dave Seymour.

14 Q. And you also report directly to him?

15 A. Yes, I do.

16 Q. Earlier you described his areas that  
17 he works in.

18 A. Right.

19 Q. But you mentioned that that job  
20 description had changed when Mr. Seymour took it  
21 over.

22 A. That is correct.

23 Q. Before that Mr. Beninate had that job?

24 A. That is correct.

25 Q. How did the job differ under Mr.

1 Beninate as compared to under Mr. Seymour?

2 A. What has happened is they have now  
3 promoted Terry Johnson. He is not an operating  
4 manager. He's from Atlanta. He has taken parts  
5 of what Mr. Beninate used to handle. So, the job  
6 has been split between two people.

7 Q. Mr. Beninate's job has been split into  
8 jobs that two people fill?

9 A. That's basically correct now. Mr.  
10 Seymour brought forecasting with him. Mr.  
11 Beninate did not have forecasting.

12 Q. Could you give me a brief listing, if  
13 you could, of the jobs Mr. Beninate had?

14 A. He had corporate and external affairs.  
15 He had industry relations. He had the customer  
16 assistance bureau. And he had Pioneers.

17 Q. Did you report directly to Mr.  
18 Beninate?

19 A. Yes, I did.

20 Q. What time period did you report to  
21 him?

22 A. Oh, I believe he came into that job --  
23 I would like to say 1989. He was there pretty  
24 much throughout 1992, I would say. He left in  
25 late '92.

1 Q. And you reported directly to him; is  
2 that correct?

3 A. Yes, that's correct.

4 Q. Do you know whether Mr. Seymour was  
5 deposed on the telephone earlier this year?

6 A. I have no idea.

7 Q. Let me ask this.

8 You said one of the areas he covers is  
9 corporate and external affairs.

10 A. That's correct.

11 Q. Can you tell me what that encompasses?

12 A. That's public relations.

13 Q. Do you know whether Mr. Beninate was  
14 at all involved in proceedings before the Public  
15 Service Commission concerning Caller ID?

16 A. I know he worked with Caller ID. I  
17 don't know. I don't know any involvement with PSC  
18 on that.

19 Q. Did you ever assist Mr. Beninate with  
20 any respect to Caller ID?

21 A. No, I did not.

22 Q. Have you ever assisted any of the  
23 people you have worked for with respect to any  
24 proceedings before the Public Service Commission,  
25 that you know of?



1 A. No, I have not.

2 Q. You have known -- is it Ms. Nivica?

3 A. Ms. Nivica, yes.

4 Q. --Ms. Nivica since 1988, I believe you  
5 said?

6 A. Yes.

7 Q. That's when you were peers in Miami?

8 A. That's correct.

9 Q. When did she transfer from Miami?

10 A. I'm not sure. It may have been early  
11 1991, or maybe late 1990. I'm really not sure.

12 Q. Did she transfer to the regulatory  
13 department in Tallahassee?

14 A. That is correct.

15 Q. Can you tell me what your  
16 understanding is of her job position in  
17 Tallahassee?

18 A. She's an assistant manager. She's a  
19 support person for Tony Lombardo.

20 Q. What does she do in that respect?

21 A. I have no idea.

22 Q. Does she not ever discuss what she  
23 does at the Public Service Commission?

24 A. No, not really.

25 Q. When you say "not really"--



1           A.     No, she doesn't. I don't know what  
2 she does.

3           Q.     Has she ever said that she works at  
4 the Public Service Commission?

5           A.     No, she has not.

6           Q.     You knew she was dating a person who  
7 is employed at the Public Service Commission, do  
8 you not?

9           A.     Yes, I do.

10          Q.     Did she not discuss that that person  
11 works at the place that she has duties that are  
12 involved?

13          A.     That's not the way she phrased it, no.

14          Q.     How did she phrase it?

15          A.     She said, "I am dating Tom McCabe."  
16 At some point, she told me he was a PSC analyst.

17          Q.     Is there anything else you know about  
18 what her job entails with respect to the Public  
19 Service Commission?

20          A.     I really don't know what her job  
21 entails.

22          Q.     You have already discussed your  
23 attendance at the Florida Telephone Association  
24 meeting in late May of 1992?

25          A.     That is correct.

1 Q. Had you ever been to a Florida  
2 Telephone Association meeting before that?

3 A. No, I had not.

4 Q. Have you ever been to any similar type  
5 of meeting before that?

6 A. Not that I can recall, no.

7 Q. Have you ever been to a meeting that  
8 related to regulation?

9 A. Never.

10 Q. What brought about your attendance at  
11 the meeting?

12 A. Well, Elise was going to be there.  
13 It's close to Miami. I had not seen her in a  
14 while. She wanted me to come down and see her.

15 Q. Did she tell you what the meeting  
16 involved?

17 A. She said it was an FTA meeting.

18 Q. Were you already familiar with what  
19 the FTA was?

20 A. I knew what FTA was.

21 Q. What did you know about the FTA?

22 A. It's an organization of the telephone  
23 companies and I guess lobbyists and other people.  
24 I don't know. It's kind of a conference type of  
25 thing, from what I understand.

1 Q. Did she tell you anybody else would be  
2 there?

3 A. I knew Tony Lombardo would be there.

4 Q. Do you know Tony Lombardo from the  
5 time before that meeting?

6 A. Yes, I do.

7 Q. When did you know Tony Lombardo from?

8 A. Oh, gosh, I have known Tony for a few  
9 years back. I don't know exactly when. He used  
10 to do work down here. Anybody in the building  
11 knew Tony.

12 Q. Was it the executive area of Miami?

13 A. Yes, it was.

14 Q. Did he work in Miami at the same time  
15 you did in executive?

16 A. Well, I don't know if we were in the  
17 same department, but he worked in Miami, yes.

18 Q. So Elise mentioned that Tony Lombardo  
19 would be there as well?

20 A. Yes.

21 Q. Was there anybody else she mentioned  
22 would be there?

23 A. No.

24 Q. Did she mention Tom Beard would be  
25 there?



1 A. Absolutely not.

2 Q. Did you drive down on Saturday?

3 A. Yes, I did.

4 Q. Do you recall about what time you got  
5 there?

6 A. I have no idea. It was probably late  
7 afternoon.

8 Q. Your first encounter with Commissioner  
9 Beard was at the pool side on Saturday?

10 A. That is correct.

11 Q. Do you recall about what time that  
12 happened?

13 A. I have no idea.

14 Q. Was it daylight?

15 A. Yes, it was.

16 Q. Was it before dinner?

17 A. Yes, it was.

18 Q. Would you believe it to be in the  
19 afternoon?

20 A. Yes, I would.

21 Q. That was Saturday, May 30th, 1992?

22 A. I believe so.

23 Q. Do you know how long before that that  
24 commissioner had been there?

25 A. I have no earthly idea.



1 Q. Do you know how he traveled to the  
2 convention?

3 A. I believe he drove his truck.

4 Q. What is your basis for believing that?

5 A. Because I believe at some point I saw  
6 him putting some stuff in the truck and I assumed  
7 it was his.

8 Q. What was he putting in the truck?

9 A. I have no idea. I just saw him  
10 putting stuff in the truck.

11 Q. When did you leave the meeting?

12 A. I believe I left Monday morning.

13 Q. Do you know whether Commissioner Beard  
14 was still there when you left?

15 A. I don't know. I believe I had gone to  
16 a speech that Monday morning and I believe he was  
17 gone after that.

18 Q. Do you recall what the speech was you  
19 were attending on Monday morning?

20 A. It was a telecommunications speech.

21 Q. Do you recall who gave it?

22 A. Yes, Tom did.

23 Q. Maybe I misheard. I thought you said  
24 you had gone to a speech on that morning and he  
25 had already left.

1 A. No, no, he left shortly after that.

2 Q. After that?

3 A. Yes.

4 Q. And you left shortly after that, also?

5 A. Yes.

6 Q. Did you leave together?

7 A. Absolutely not.

8 Q. Do you recall about how long it was  
9 when he next contacted you after that meeting?

10 A. I do not recall, no.

11 Q. Changing subjects. This may happen  
12 sometimes. There are a lot of things I was going  
13 to ask that have been covered already.

14 I want to show you -- putting a letter  
15 on this, the same sequence as before -- an entry  
16 from your personal file which relates to job  
17 function codes.

18 A. That's correct.

19 Q. Are you familiar with job function  
20 codes?

21 A. Somewhat.

22 Q. Was there a meeting or some kind of  
23 meeting at which your job functions were  
24 evaluated by Southern Bell and reassigned a new  
25 job function code?

1           A.     No. From what I understand, for  
2 everybody in the company they did a mass change of  
3 job function codes.

4           Q.     Did somebody come in and question you  
5 about what your job functions were?

6           A.     No. I think you basically looked at  
7 them and made sure they were correct and then you  
8 filled out this form and turned it in. No one  
9 asked you.

10           MR. SALE: For the record, the  
11 document the witness looked at is payroll change  
12 processing checkbook attachment two, dated  
13 8/5/91.

14           MR. KUEHNE: I believe that is "J,"  
15 the next letter?

16           MR. BECK: Sure.

17 BY MR. BECK:

18           Q.     There is an approved signature on this  
19 which has been labeled J. Do you recognize the  
20 signature?

21           A.     Yes, that is Terry Brand.

22           Q.     Who is that?

23           A.     I think she's an assistant manager.

24           Q.     Do you know why she would have  
25 approved these job functioning codes?



1           A.     She was approving all the job  
2     functioning code changes.

3           Q.     Let me ask you, if you could, one more  
4     time, take a look at the document. You see there  
5     there are a number of job functions, new job  
6     function codes listed on the document?

7           A.     Right.

8           Q.     Do you know what they are?

9           A.     I don't know exactly what they  
10    represent, no. Basically, I have the job  
11    function codes of the persons I support and  
12    report to, so that is what they reflect, I am  
13    sure.

14          Q.     It would be the same as what Mr.  
15    Beninate was at that period?

16          A.     Basically.

17                 MR. BECK: Thank you.

18                 We had spoken to Mr. Anthony earlier.  
19    I was wondering if as a late filed exhibit we  
20    could get a description of what each of these job  
21    function codes is.

22                 MR. ANTHONY: We will provide them.

23    BY MR. BECK:

24          Q.     I believe earlier you mentioned two  
25    occasions when you had a meal with Mr. Lombardo?



1 A. That's correct.

2 Q. I recall one in the Keys, Key Largo.

3 A. That's correct.

4 Q. And the second one in Washington this  
5 past either late February or early March?

6 A. That is correct.

7 Q. Have you had any other meals with Mr.  
8 Lombardo?

9 A. I have not.

10 Q. Have you had any discussions with him?

11 A. Wait, wait. Let me go back.

12 I don't recall right now if I have  
13 ever had any other meals with Tony Lombardo. I  
14 can absolutely tell you I have had no other meals  
15 with Tony Lombardo when Tom Beard was present. I  
16 don't know if in the last several years I haven't  
17 sat down to lunch with Tony.

18 Q. Any of the questions I would ask you  
19 now, as a starting point, it would be since you  
20 met Tom Beard, the Key Largo time.

21 A. Okay.

22 Q. Let me ask this.

23 Since that time have you had any  
24 discussions with Tony Lombardo or any meals,  
25 first of all, with Tony Lombardo other than the

1 two we have discussed already?

2 A. Not that I can think of.

3 Q. Did Mr. Lombardo ever talk to you  
4 about your relationship with Commissioner Beard?

5 A. I am sure it has been mentioned. He  
6 was aware of our relationship after November.

7 Q. Now are you referring to Commissioner  
8 Beard's call to Joe Lacher?

9 A. It was not a call. He and Tony  
10 Lombardo and Joe Lacher were at a NARUC meeting  
11 together when it was discussed. That is what I  
12 was told. I was not present.

13 Q. When you say it was discussed, the  
14 topic was that you had a relationship with  
15 Commissioner Beard?

16 A. That is correct.

17 Q. And it was three people? Did you  
18 understand that Commissioner Beard told it to  
19 both Mr. Lombardo and Mr. Lacher?

20 A. That's my understanding.

21 Q. What do you base that understanding  
22 on?

23 A. What Commissioner Beard told me.

24 Q. Do you know or do you have any reason  
25 to believe that Mr. Lombardo knew about the

1 relationship before that November discussion you  
2 just mentioned?

3 A. Not that I have reason to believe, no.

4 Q. The November discussion, is that at  
5 the meeting in Los Angeles?

6 A. That is correct.

7 Q. I recall you said that Commissioner  
8 Beard picked you up at the airport in Los Angeles  
9 and you left directly for Big Sur after that.

10 A. That's correct.

11 Q. Did you discuss during that trip to  
12 Big Sur the meeting that he had with Joe Lacher  
13 and Tony Lombardo?

14 A. He may have mentioned it. I don't  
15 recall that specifically.

16 Q. Did he tell you the reason that he  
17 made disclosure to them?

18 A. Absolutely. His ex-wife was harassing  
19 us and saying she was going to go to the media,  
20 that she was going to ruin Tom and make it look  
21 like we were doing inappropriate things, which we  
22 did not.

23 Q. Did Commissioner Beard tell you what  
24 reaction Joe Lacher or Tony Lombardo had to that  
25 disclosure?



1 A. Not to my recollection, no.

2 Q. You didn't ask Commissioner Beard how  
3 Joe Lacher had reacted?

4 A. No, I did not. The only thing he told  
5 me was that Joe had suggested I talk with Hank and  
6 Hank would be talking to me.

7 Q. Did he mention that to you while in  
8 the trip?

9 A. I have no idea when he mentioned that.

10 MR. CURINGTON: Who is Joe and Hank?

11 THE WITNESS: Hank is right there.

12 Joe Lacher is the president.

13 BY MR. BECK:

14 Q. Joe Lacher is the president of  
15 Southern Bell Florida?

16 A. Yes.

17 Q. And Hank Anthony is the general  
18 attorney in your Miami office?

19 A. I believe that's his title; I'm not  
20 sure.

21 Q. Do you do the training and are you the  
22 MTR coordinator for Mr. Anthony, as well as  
23 others?

24 A. Yes, I do.

25 Q. How long after that disclosure did Mr.



1 Lombardo and Mr. Lacher follow your discussions  
2 with Mr. Anthony?

3 A. I believe it was within days.

4 Q. How did that come about? Did you get  
5 a message?

6 A. I had a message on my desk that Hank  
7 had called me.

8 Q. And you called him and set up a  
9 meeting?

10 A. Yes.

11 Q. To the best of your recollection,  
12 specifically what did Mr. Anthony tell you?

13 A. I walked in. Mr. Anthony said, "I  
14 feel very uncomfortable doing this. This is your  
15 personal life. We don't have a right to intrude  
16 into your personal life, but we just want to make  
17 sure you understand your responsibilities, that  
18 you're not supposed to be talking about business  
19 with Tom Beard. I assured Mr. Anthony I was very  
20 aware of my responsibilities.

21 At that point he said, "Great! I just  
22 wanted to make sure." And that was it.

23 Q. Were there any instructions or  
24 guidance given you that were more specific other  
25 than just not to talk business with Commissioner

1       Beard?

2           A.     Not to my recollection. I mean we  
3 both were very clear on what the proper conduct  
4 was.

5           Q.     You attended the NARUC convention in  
6 Washington, D.C.?

7           A.     I was there with Tom before the NARUC  
8 convention started, to my understanding. I did  
9 not attend the convention with him.

10          Q.     It would be your understanding the  
11 NARUC convention deals with regulations of  
12 utilities, or would it be?

13          A.     I would imagine that, yes.

14          Q.     Why did you go to a convention that  
15 deals with the regulation of utilities?

16          A.     I did not go to the convention. I was  
17 there before the convention started. I went to  
18 Washington.

19          Q.     If I recall correctly, you met with  
20 Commissioner Beard in the Atlanta Airport on  
21 Friday the 26th.

22          A.     That's correct.

23          Q.     Then you flew to Washington on the  
24 same flight from Atlanta to Washington?

25          A.     That's correct.

1 Q. When you arrived in Washington, did  
2 you go to the Marriott Hotel?

3 A. That is correct.

4 Q. Was Commissioner Beard with you fairly  
5 constantly from that time until the time you went  
6 to the reception?

7 A. Yes, pretty much.

8 Q. Did you do any tourist type things  
9 while there in Washington?

10 A. We walked around by the White House.  
11 We went to Japanese restaurants. Yes, we did.

12 Q. Did Commissioner Beard leave to attend  
13 any conferences before that reception?

14 A. Yes, he did.

15 Q. Do you recall what they were?

16 A. I have no idea.

17 Q. Do you recall when it was he attended  
18 the conferences?

19 A. I believe Monday morning just before I  
20 left.

21 Q. The reception was on a Sunday evening,  
22 was it not?

23 A. I believe.

24 Q. Before the Sunday evening reception,  
25 from the time you got there on Friday until the



1 reception on Sunday evening, did Commissioner  
2 Beard leave to go to any conference?

3 A. Not to my recollection.

4 Q. Were you with him most of that time?

5 A. Yes.

6 Q. You had a dinner with Tony Lombardo  
7 and his wife on that Saturday evening?

8 A. That's correct.

9 Q. Where was that that you had the  
10 dinner?

11 A. At an Italian restaurant. I don't  
12 recall the name of it.

13 Q. No matter with respect to Southern  
14 Bell was ever discussed at that meeting?

15 A. No matter was ever discussed about  
16 Southern Bell at that meeting.

17 Q. You said on Monday Commissioner Beard  
18 left for a meeting of some sort?

19 A. I believe so, yes.

20 Q. Did you leave shortly after that?

21 A. Yes, I did.

22 Q. What time did you leave?

23 A. I could not tell you that. I don't  
24 remember.

25 Q. Did you go to the airport by yourself?



1 A. No, he went with me.

2 Q. How did you go there?

3 A. I believe by taxi.

4 Q. Did you come back to Miami from there?

5 A. Yes, I did.

6 Q. Do you recall about what time you got  
7 back?

8 A. I do not know.

9 Q. Have you had any reason to talk to  
10 Tony Lombardo other than at these two dinners  
11 that you discussed?

12 A. Have I had any reason to talk to Tony  
13 Lombardo?

14 Q. Or have you talked with him?

15 A. Yes, I have talked with him.

16 Q. On what occasions have you talked with  
17 him?

18 A. I cannot recall exactly, but I know I  
19 see him occasionally.

20 Q. Did you have any business discussions  
21 with Tony Lombardo?

22 A. Not that I can recall, no.

23 Q. Other than what we have talked about  
24 already, has he at any time asked you about your  
25 relationship with Commissioner Beard?

1 A. Has Tony Lombardo asked me?

2 Q. Yes.

3 A. No, he has not.

4 Q. Has Joe Lacher talked to you about the  
5 relationship?

6 A. I have not talked to Mr. Lacher about  
7 the relationship, no.

8 Q. Who else at Southern Bell have you  
9 talked to about the relationship with  
10 Commissioner Beard?

11 A. Well, Elise knew, and a friend of mine  
12 named Val Sapp was aware of it. There was another  
13 friend of mine named Gay Walker. And that I can  
14 think, I can't think of anybody else.

15 Q. How about Mr. Beninate?

16 A. I have never discussed it with Mr.  
17 Beninate.

18 Q. Has Commissioner Beard ever discussed  
19 that he had a hard time at the office, that kind  
20 of discussion?

21 A. I'm sure he came home at some point  
22 and called and said that he had had a rough day  
23 today.

24 Q. Did he ever discuss any frustration  
25 with the process of the Public Service

1 Commission?

2 A. No, not that I recall.

3 Q. Do you recall if he has ever been  
4 aggravated about anything with respect to this  
5 job?

6 A. In general terms, maybe. At some  
7 point I'm sure everyone gets aggravated. I don't  
8 recall specifics, no, I don't.

9 Q. You mentioned you are the MTR  
10 coordinator for executive.

11 A. That's correct.

12 Q. That includes people in Tallahassee,  
13 Orlando, and other areas of the state?

14 A. That's correct.

15 Q. Does your job responsibility cover  
16 everybody who is in Tallahassee?

17 A. I believe there are some marketing  
18 people in Tallahassee that I am not responsible  
19 for.

20 Q. When did you first discover that  
21 Commissioner Beard was on the Public Service  
22 Commission?

23 A. I have no idea.

24 Q. Was it at Key Largo?

25 A. It may have been.



1 Q. Did it make any difference to you that  
2 he was on the Public Service Commission?

3 A. No, it did not.

4 Q. You mentioned about several plane  
5 trips you have taken to Tallahassee.

6 A. That's correct.

7 Q. Have people met you at the airport at  
8 various times coming up there?

9 A. Sure.

10 Q. For example, has Elise met you at the  
11 airport and taken you to her house?

12 A. Yes, she has.

13 Q. How about Commissioner Beard?

14 A. Yes, he has.

15 Q. He has done that.

16 Do you recall about when those times  
17 were?

18 A. I have no idea.

19 Q. The hurricane was on what day of the  
20 week?

21 A. I believe it was early Monday morning  
22 that it hit.

23 Q. You already discussed you didn't go to  
24 your office that work week following the  
25 hurricane.



1 A. That's correct.

2 Q. Weren't people at Southern Bell  
3 working hard during that time to secure service?

4 A. The outside forces.

5 Q. Was your office in general all not  
6 reporting during that week?

7 A. It depends. Some people reported and  
8 some people didn't.

9 Q. What was the criteria for reporting or  
10 not reporting?

11 A. The criteria was personal, I guess, as  
12 far as how hurt your home was or whether you felt  
13 you could come in at that point or not.

14 Q. How did they tell you whether you had  
15 to come to work or not?

16 A. They didn't tell you.

17 Q. Did you not call the office?

18 A. Absolutely I did.

19 Q. To find out whether you had to report  
20 in?

21 A. It wasn't to find out whether I had to  
22 report in, it was to see how things were going and  
23 to talk to the people there.

24 Q. As I recall, Commissioner Beard was  
25 staying with you that entire week, or do I recall

1       incorrectly?

2           A.     I am not sure of that. That's a  
3       possibility, yes, but I'm not going to tell you  
4       absolutely.

5           Q.     Do you know whether a service hearing  
6       had been set in the Southern Bell rate case for  
7       that Monday, the date the hurricane hit?

8           A.     I'm not sure.

9           Q.     You do not know whether he was down  
10      here to attend a service hearing scheduled for  
11      that Monday?

12          A.     I really don't recall that.

13          Q.     Did he stay with you most of that  
14      week? Did he go out a lot, or was he with you at  
15      your house a lot?

16          A.     He was gone a lot.

17          Q.     Do you know what he was doing?

18          A.     It was business. I have no idea.

19          Q.     Is that what he was telling you, "I  
20      have business," but he never told you what his  
21      business was, what he was doing?

22          A.     He would say, "I have a meeting; I'll  
23      be back hopefully around six," or whatever.

24          Q.     Is that typical of your relationship,  
25      he will tell you he has a meeting but will never

1 say what it is?

2 A. Pretty much, yes.

3 Q. Do you recall any time that he has  
4 told you the purpose of a meeting he had attended?

5 A. Oh, sure, he may have told me, "I am  
6 going to NARUC," or, "I am going to FTA," or  
7 whatever, something like that, sure.

8 Q. But he would never discuss what  
9 happened at the meeting?

10 A. No.

11 Q. You mentioned earlier, the week of  
12 April, I believe the 5th, or sometime during that  
13 week in St. George's Island in 1993 Tom McCabe and  
14 Elise Nivica came to visit you?

15 A. That's correct.

16 Q. Did they stay at the same house you  
17 were renting?

18 A. Yes, they did.

19 Q. They left the next day?

20 A. Yes, they did.

21 Q. Do you know what time they left?

22 A. In the morning.

23 Q. Other than beating Tom McCabe at Mario  
24 Brothers, what other activities did you do while  
25 you were there?



1           A.     They got there pretty late in the  
2 evening. The kids were all over the place.  
3 Everybody was playing with the kids. Tom and I  
4 made dinner. We sat and had dinner. I believe  
5 someone had rented a movie. We may have watched  
6 that. And then we played Dr. Mario.

7           Q.     Have there been any other times where  
8 you, Commissioner Beard, and Tom McCabe have been  
9 together at the same time?

10          A.     Not to my recollection, no.

11          Q.     You mentioned at one time you went to  
12 Tom's parents' house in the Tampa area?

13          A.     That's correct.

14          Q.     You said you believed that Tom was  
15 driving his parents' car?

16          A.     Yes.

17          Q.     Do you recall what kind of car it was?

18          A.     I believe it's a Chrysler of some  
19 kind.

20          Q.     Had he ever told you he had been to  
21 Enis Brook at a conference?

22          A.     Not that I recall, no.

23          Q.     Do you know what the National  
24 Consulting Network is?

25               MR. KUEHNE: Let's just look at some



1 notes to figure out, first of all, if that was  
2 asked -- I think a response was given -- so we can  
3 reiterate our position.

4 MR. SALE: To keep the record  
5 consistent.

6 (Thereupon, a recess was taken for the  
7 perusal of papers and for the court reporter to  
8 change the stenographic paper, after which the  
9 following proceedings were had:)

10 MR. KUEHNE: In reviewing my notes, it  
11 appears that that question was asked in a similar  
12 fashion by Mr. Curington and that we instructed  
13 Alma that she is not to answer that question  
14 unless the question is phrased to reflect  
15 involvement with a regulated industry or an  
16 individual who works for a regulated industry.

17 MR. BECK: Obviously, I don't agree  
18 with that limitation. I need to know if you're  
19 going to instruct her to answer only within that  
20 limitation.

21 MR. KUEHNE: It depends on the  
22 question you ask if I instruct her not to answer.

23 MR. BECK: I asked what National  
24 Consulting Network is, and your counsel has  
25 instructed you not to answer that question.

1 MR. KUEHNE: That is correct.

2 BY MR. BECK:

3 Q. Has Commissioner Beard ever talked to  
4 you about National Consulting Network?

5 MR. KUEHNE: I am instructing the  
6 witness similarly.

7 BY MR. BECK:

8 Q. Have you ever talked to anyone else  
9 about National Consulting Network other than  
10 Commissioner Beard?

11 A. Absolutely not.

12 Q. Do you know what TMB Associates is?

13 MR. KUEHNE: That was asked and  
14 answered to the extent that the witness said --  
15 let me look -- that she is unaware of what that  
16 is, that Commissioner Beard may have discussed it  
17 with her, but she does not know what it has to do  
18 with.

19 BY MR. BECK:

20 Q. Could you tell me what Commissioner  
21 Beard told you about TMB Associates?

22 A. I do not recall.

23 Q. What do you recall about TMB  
24 Associates?

25 A. I recall it may have been mentioned.

1 Q. What do you know about the substance  
2 of TMB Associates?

3 A. Nothing. I mean I don't -- I don't  
4 recall.

5 Q. What was the context in which it may  
6 have been mentioned?

7 A. I have no idea.

8 Q. Is there anything else you know about  
9 TMB Associates?

10 A. No.

11 Q. Are you answering it within the  
12 limitations that your counsel has placed or are  
13 you answering without that limitation?

14 MR. BECK: Let your counsel respond.  
15 You may want to talk first.

16 MR. KUEHNE: I don't believe there was  
17 any limitation of TMB Associates since the  
18 witness previously testified she is unaware of  
19 what TMB Associates is and does not recall  
20 Commissioner Beard having discussed it with her,  
21 although he might have.

22 BY MR. BECK:

23 Q. The question is, are the answers you  
24 have given about TMB Associates given without any  
25 qualifications or limitations in your answer?



1           A.     Absolutely I do not recall, so I  
2 cannot answer.

3           MR. SALE: Mr. Beck, Mr. Kuehne's  
4 instruction in that regard we adopt since we do  
5 not have the record transcribed. Whatever  
6 reasons I also gave to similar questions is our  
7 basis for the instruction.

8 BY MR. BECK:

9           Q.     Has Commissioner Beard ever discussed  
10 with you a conference he attended in Rhode Island  
11 on June the 16th through the 18th of 1992?

12          A.     No.

13          Q.     Do you know whether he attended such a  
14 conference there?

15          A.     I have no idea.

16          Q.     Where did Commissioner Beard stay when  
17 he visited you in San Diego?

18          A.     He stayed at my nephew's, if I recall  
19 correctly.

20          Q.     That's where you were staying, also?

21          A.     That is correct.

22          Q.     Do you know whether Commissioner Beard  
23 was on a task force appointed by the governor with  
24 respect to Hurricane Andrew?

25          A.     I believe he was, yes.



1 Q. Has he ever discussed with you any of  
2 the matters that related to that?

3 A. No, he did not.

4 Q. Has he ever talked to you about how  
5 the hurricane affected Southern Bell's service?

6 A. No, he did not.

7 Q. For example, did he ever discuss how  
8 many phones were taken out of service by the  
9 hurricane?

10 A. Not with me, no.

11 Q. Did he ever discuss his opinions at a  
12 Florida League of Citizens conference?

13 A. Not that I can recall, no.

14 Q. You may have been asked this question  
15 earlier. I don't really recall if it has been  
16 answered. Let me ask.

17 There was a meeting with Carlos  
18 Mattausch of Argentina. Do you recall questions  
19 about that?

20 A. Yes, I do.

21 Q. Did you ever discuss Commissioner  
22 Beard's meeting with that person?

23 A. No, I did not.

24 Q. Do you know who that person is?

25 A. I have no idea.

1 Q. Do you know whether he stayed with you  
2 at the time he went to that meeting?

3 A. I have no idea.

4 Q. Has he ever discussed with you any  
5 service hearings related to Southern Bell?

6 A. He has not.

7 Q. Do you know whether he attended any  
8 Southern Bell meetings?

9 A. I have no idea.

10 MR. BECK: I think that's all I have.

11 MR. SALE: I think there was one thing  
12 you wanted to clarify.

13 THE WITNESS: You said something about  
14 if we were ever with Elise and Tom McCabe. I can  
15 recall Elise on one occasion when Tom Beard came  
16 to pick me up at Elise's house and Tom McCabe was  
17 present.

18 BY MR. BECK:

19 Q. When was that?

20 A. I cannot tell you specifically, but I  
21 do know that that happened.

22 Q. Tom McCabe was at Elise's house?

23 A. That's correct.

24 Q. And Commissioner Beard came to pick  
25 you up?

1 A. That's correct.

2 Q. Do you recall where he took you?

3 A. I have no idea.

4 Q. Did he come in or did you just go with  
5 him?

6 A. He came in and stayed for a few  
7 minutes and then left.

8 Q. Do you recall what was discussed?

9 A. I am sure it was, "How are you," that  
10 type of thing.

11 Q. When Commissioner Beard paid for your  
12 travel, how was that accomplished?

13 A. I have no idea.

14 Q. How did you get the ticket, for  
15 example, for the Washington meeting with NARUC?

16 A. I guess he either gave it to me or  
17 mailed it to me. I really don't recall exactly  
18 how.

19 Q. He picked up that ticket though? He  
20 paid for the ticket to the Washington meeting?

21 A. Yes, he did.

22 Q. And he paid for how many to  
23 Tallahassee?

24 A. Oh, gosh, I have no idea. He has paid  
25 for quite a few of them. I have paid for quite a



1 few of them. I don't know. That would be very  
2 hard to determine.

3 Q. Do you recall in any instance where he  
4 paid for the ticket how that was accomplished and  
5 how you got delivery of it the ticket?

6 A. I know there were times that he went  
7 them to me and I know there were times he handed  
8 them to me.

9 Q. Have you met any other persons  
10 connected with the Public Service Commission that  
11 you have not already discussed in your deposition  
12 today?

13 A. No, not that I can think of, no.

14 MR. BECK: That's all I have. Thank  
15 you.

16 THE WITNESS: Thank you.

17 BY MS. GREEN:

18 Q. Good afternoon. Ms. Paruolo, I know  
19 it's been a long day, so I am going to try and be  
20 very brief. I am Angela Green. I represent the  
21 commission staff.

22 I am a little bit confused. I am  
23 trying to understand what your job function  
24 duties are in relation to preparing revenue  
25 forecasts for the company. Would you explain



1 that to me?

2 A. I do not have any current  
3 responsibilities that relate to revenue, revenue  
4 forecasting. I used to work in revenue  
5 forecasting. I believe it was six or seven years  
6 ago.

7 Q. How does Mr. Seymour's role in that  
8 relate to your job responsibilities?

9 A. Do you mean Mr. Seymour's in  
10 forecasting?

11 Q. Yes.

12 A. He is their boss, the same as he is my  
13 boss.

14 Q. Do the people that you supervise  
15 prepare documents for him that are used in his job  
16 in forecasting?

17 A. No.

18 Q. I have another question related to  
19 your specific job function.

20 I am referencing a document that was  
21 identified earlier by letter number which I do  
22 not have, but it's your most recent performance  
23 appraisal, the one that goes through the end of  
24 '92.

25 A. Okay.

1           Q.     One of the standards dealing with your  
2 performance of your job functions has to do with  
3 directing customer complaints and media calls.  
4 In light of your job responsibilities of that  
5 nature, would you not generally be aware if the  
6 company was having a public service hearing in  
7 this area of the state?

8           A.     I might be aware of it. I mean,  
9 employees talk. It's not part of my  
10 responsibilities.

11          Q.     Is there some other person or division  
12 that would be the one to interact with public  
13 inquiries about the service hearing? What I mean  
14 is if someone were to call the company and say, "I  
15 want to know what I have to do to be able to  
16 talk," or, "Where is the hearing going to be?"

17          A.     I assume that a person calling in  
18 would call the business office. The customer  
19 complaints that I handle are customers who  
20 somehow get the public relations number and just  
21 call in with a complaint. At that point, we are  
22 instructed to handle them and try to direct them  
23 to whomever or get someone to call them back and  
24 handle their complaint.

25          Q.     Your phone number is not one the

1 public would generally have as the first access  
2 point?

3 A. That is absolutely correct.

4 Q. You stated several times in your line  
5 of questioning with Mr. Curington that Deborah  
6 Hart had made threats during the phone calls in  
7 November, threats to the effect that you and  
8 Commissioner Beard were doing inappropriate  
9 things?

10 A. That is correct.

11 Q. Did she state specifically, to the  
12 best of your recollection, what kind of  
13 inappropriate things she was going to say that  
14 you were doing?

15 A. To the best of my recollection, she  
16 was going to say that I worked for Southern Bell  
17 and that I am passing information to him. That's  
18 essentially what he said. She said she was going  
19 to ruin him.

20 Q. Had you had any contact with Deborah  
21 Hart prior to those phone calls in November?

22 A. If I remember correctly, the first  
23 time she called me was in late August. I've never  
24 had any contact with her. I have never met her.  
25 I would not recognize her right now if she walked



1 into the room.

2 Q. When she called you in approximately  
3 late August, where would you have been when you  
4 received that phone call?

5 A. I was at home.

6 Q. Here in Miami?

7 A. That is correct.

8 Q. What was the nature of that telephone  
9 call?

10 A. The nature of it was threatening and  
11 abusive.

12 Q. Of the same type that we discussed  
13 regarding November?

14 A. That is correct.

15 Q. Did you talk to Commissioner Beard  
16 about that phone call?

17 A. Yes, I did.

18 Q. What was his reaction?

19 A. He was very upset.

20 Q. What, if any, course of action was  
21 taken after the August phone call?

22 A. At that point, to the best of my  
23 recollection, none. We were just hoping that  
24 this was an isolated incident.

25 Q. Do you know whether he talked to her



1 about that?

2 A. I believe he did, yes.

3 Q. Do you have any idea how she would  
4 have gotten your phone number?

5 A. I believe she got it out of his house,  
6 off of his telephone list.

7 Q. Are you afraid of Deborah Hart?

8 A. It has caused me concern for my safety  
9 and my daughter's. Yes, it has.

10 Q. Has she threatened anything physical?

11 A. Yes, she has.

12 Q. What was the nature of those threats?

13 A. She has threatened or insinuated  
14 hurting me and hurting my child and that I'll be  
15 sorry.

16 Q. Is there any kind of restraining order  
17 in effect to keep her away from you?

18 A. There is a restraining order to keep  
19 her away from Tom, but not from me, no.

20 Q. How would you describe your friendship  
21 with Elise?

22 A. How would I describe it? I'm not sure  
23 I understand.

24 Q. Is she your best friend?

25 A. She is one of my best friends, yes.

1 Q. Do you have any personal knowledge of  
2 how long Elise has been dating Tom McCabe?

3 A. I am not exactly sure.

4 Q. Do you know approximately how long?

5 A. I am very hesitant to answer that  
6 because I'm not sure.

7 Q. Do you know how long Commissioner  
8 Beard's term of office is that remains?

9 A. Yes, I do.

10 Q. How long is that?

11 A. I believe it expires on December 31,  
12 1993.

13 Q. That is this year?

14 A. That is correct.

15 Q. Has he discussed with you what his  
16 plans are regarding seeking reappointment?

17 MR. KUEHNE: We have previously  
18 interposed an objection and instructed the  
19 witness not to answer as to personal  
20 communications she has had with Commissioner  
21 Beard unless those personal communications relate  
22 to a regulated industry or relate to a person who  
23 works for a regulated industry. To the extent  
24 it's a question as to whether Tom Beard is going  
25 to reapply to the PSC, we are instructing Alma not

1 to answer that question.

2 MS. GREEN: Your basis for that is  
3 what?

4 MR. KUEHNE: It's a private  
5 communication between the two of them which  
6 cannot be intruded by the state or any agency of  
7 the state of Florida.

8 BY MS. GREEN:

9 Q. Has Commissioner Beard discussed with  
10 you what his plans are for his future regarding  
11 his employment?

12 MR. KUEHNE: To the extent that your  
13 question does not limit the focus to his  
14 employment with a regulated industry or people  
15 who work for a regulated industry, I am  
16 instructing the witness to not answer that  
17 question for the same reason.

18 BY MS. GREEN:

19 Q. Has he discussed with you any plans or  
20 thoughts regarding going to work for any  
21 regulated industry or affiliate of any regulated  
22 industry?

23 A. No.

24 Q. Do you know what Commissioner Beard's  
25 father does for a living?



1 A. Yes, I do.

2 Q. Do you know what he did before you met  
3 him? Before you met Commissioner Beard, were you  
4 aware who his father was?

5 A. I wasn't aware who Commissioner Beard  
6 was, much less his family.

7 Q. And just to clarify something that I  
8 heard earlier that I do think that you said, was  
9 it your testimony that you have no  
10 responsibilities whatsoever related to Southern  
11 Bell's spending rate proceedings before the  
12 Florida Public Service Commission?

13 A. That is absolutely correct.

14 MS. GREEN: Thank you very much.

15 MR. CURINGTON: I have a few other  
16 questions.

17 REDIRECT EXAMINATION

18 BY MR. CURINGTON:

19 Q. Ma'am, when we went over these various  
20 cities, did you ever have any invitation from  
21 Commissioner Beard that you could not accept to  
22 visit with him in any of these locations?

23 A. Not that I can recall, no.

24 Q. Do you know whether Commissioner Beard  
25 considers himself to be a personal friend of your



1 friend Elise Nivica?

2 A. I think Tom considers Elise my friend,  
3 and if he is her friend, it is because of me.

4 Q. Was there any friendship there before?

5 A. No.

6 Q. Before June of '92?

7 A. No, there was not.

8 Q. Were they even acquaintances at that  
9 point?

10 A. I don't believe so. I'm not sure  
11 about that, but I don't believe so.

12 Q. When you were introduced in May at the  
13 Ocean Reef, do you think they were introduced for  
14 the first time?

15 A. They may have been, yes.

16 Q. Do you know whether Commissioner Beard  
17 considers himself to be personal friends with Mr.  
18 Lombardo?

19 A. That's a very hard question to answer.  
20 I would be hesitant to call them personal  
21 friends.

22 Q. Do you know, for example, why the  
23 commissioner would have been invited to the  
24 Lombardos' thirtieth anniversary as opposed to  
25 other people being invited?

1           A.     Maybe there was no one in Washington  
2 they knew. I don't know.

3           Q.     Has he talked about any other social  
4 contacts with Mr. Lombardo?

5           A.     Not to my recollection.

6           Q.     I want to ask this question about  
7 Commissioner Beard's seeking reappointment to the  
8 PSC. I want to know whether he has ever talked to  
9 you about whether he intends to seek that and  
10 whether or not he would ever talk to a regulated  
11 industry to lobby or assist him in getting that  
12 reappointment.

13           MR. KUEHNE: Let me interject.

14                 You have asked two specific questions.  
15 If you could break it down. I think the first  
16 question was has he ever spoken with you about  
17 seeking reappointment to the PSC.

18           MR. CURINGTON: Yes.

19           MR. KUEHNE: And your second question  
20 I think was has he ever spoken with you about  
21 seeking help from the regulated industry about  
22 being appointed to the PSC. Is that right?

23           MR. CURINGTON: Yes.

24           MR. KUEHNE: Break it down into each  
25 of those questions and we can take it one by one.

1 BY MR. CURINGTON:

2 Q. Can you answer the first question?

3 MR. KUEHNE: We have gone through that  
4 several times before and we are advising the  
5 deponent that she is not to answer that question  
6 because it seeks to intrude upon a personal,  
7 private communication between Commissioner Beard  
8 and Alma which we believe is inappropriate for  
9 the questions based upon the private nature of  
10 those communications.

11 MR. CURINGTON: Let me ask you, is it  
12 your position -- I don't mean to argue the law,  
13 but my understanding of discovery is if it might  
14 lead to admissible evidence we get to ask it, and  
15 if it is not privileged, we get to ask it and they  
16 have to answer.

17 Is it your position the right of  
18 privacy outweighs those legal principles?

19 MR. KUEHNE: It's our position the  
20 constitutional right of privacy is, in essence, a  
21 constitutional privilege much like other  
22 privileges which are constitutionally based.

23 MR. CURINGTON: You are instructing  
24 her not to answer?

25 MR. KUEHNE: Yes.



1 BY MR. CURINGTON:

2 Q. Has Commissioner Beard ever talked to  
3 you about the possibility of getting any  
4 regulated industry, including Southern Bell, to  
5 assist him in his job hunt to the inclusion of  
6 possible reappointment to the PSC?

7 A. No, he does not.

8 MR. CURINGTON: I have no other  
9 questions.

10 Thank you.

11 MS. MILTON: If everyone else is  
12 through, I have a couple of questions.

13 CROSS EXAMINATION

14 BY MS. MILTON:

15 Q. You testified hours ago in the opening  
16 statements of your deposition here that you are  
17 the coordinating training officer for the  
18 executive department?

19 A. That is correct.

20 Q. Are you involved in the substantive  
21 aspect of that training?

22 A. No, I am not.

23 Q. What is it you do, precisely?

24 A. I let all the people know what is  
25 available. Sometimes they are mandatory classes



1       which they must attend. I let them know they are  
2       mandatory classes they must attend. At that  
3       point, we get in the schedule aspect of it and I  
4       coordinate the trainer and attendees meetings.

5           Q.       You mentioned again hours and hours  
6       ago you had some interaction with the executives  
7       in conjunction with your training programs?

8           A.       That is correct.

9           Q.       Is that interaction limited to the  
10      extent you just described, scheduling and giving  
11      them a menu of alternatives available to them?

12          A.       Yes, that is exactly correct.

13          Q.       Do you have any substantive input into  
14      the training aspect of the MTR program?

15          A.       No, I do not.

16          Q.       Is your activity limited to the same  
17      sort of function?

18          A.       It is basically the same sort, except  
19      they may have problems with MTR, at which point  
20      it's my responsibility to resolve that problem  
21      for them. If I don't have the answer, I have to  
22      go higher up to get the answer.

23                   MS. MILTON: Thank you.

24                   I have nothing further.

25                   MR. SALE: I have nothing.

1 MR. CURINGTON: We want to order a  
2 copy.

3 MR. ANTHONY: I want a copy.

4 MR. SALE: We will have to let you  
5 know.

6 We want Ms. Paruolo to have the  
7 opportunity to read the deposition, which I have  
8 now submitted before filing.

9 (Thereupon, Ms. Green requested a  
10 transcript of the above proceedings.)

11 (Thereupon, the taking of the  
12 deposition was concluded at 5:30 p.m.)

13 (Reading, signing, and notice of  
14 filing were not waived.)

---

ALMA DIAZ-PARUOLO

Sworn to and subscribed before me this

\_\_\_\_\_ day of \_\_\_\_\_, 1993.

---

Notary Public, in and for the  
State of Florida at Large

My commission expires:

\_\_\_\_\_



**ALMA DIAZ-PARUOLO**

**RE Comprehensive Review of the Revenue  
Requirements and Rate Stabilization of  
Southern Bell Telephone & Telegraph Co.  
Docket No. 920260TL**

**DEAR MS. DIAZ-PARUOLO:**

**This letter is to inform you that your  
deposition, taken on May 5, 1993, is ready for  
reading and signing, and is available at the  
Offices of Laws Reporting, Inc., 1360 Northwest  
16th Street, Miami, Florida.**

**Thank you,**

---

**JOAN C. TIBBITS  
Court Reporter**



CERTIFICATE

STATE OF FLORIDA:

COUNTY OF DADE:

I, JOAN C. TIBBITS, Court Reporter and Notary Public in and for the State of Florida at Large, do hereby certify that I reported the deposition of ALMA DIAZ-PARUOLO, taken before me at the time and place stated in the caption thereof.

I further certify that said witness was duly sworn according to law; that I am not of counsel to any of the parties hereto, or otherwise interested in said cause.

IN WITNESS WHEREOF, I have hereunto set my hand and affixed my official seal this 9th day of May, 1993.

  
JOAN C. TIBBITS

My commission expires: November 6, 1995



S.S. Number \_\_\_\_\_

[illegible]

**Column B**

### Incidental Absences and Other Codes to be Summarized

| Absence Due To                                  |                                     | Code  |           |
|---|-------------------------------------|-------|-----------|
|   |                                     | Field | Not Field |
| Personal Reasons<br>Home Conditions             | First 7 Calendar Days               | MP    | H         |
|   | After 7 Calendar Days up to 30 Days | MP    | F (H)     |
| Illness—Prior to 6th Full Calendar Day          |                                     | IP    | I         |
| On Duty Accident—Prior to 6th Full Calendar Day |                                     | IA    | I         |
| On Duty Accident—Less than Full Tour            |                                     | IP    | —         |
| Absent—No Report                                |                                     | —     | N         |

**NOTE:** Where Absence IP, IA or I Extend into ME, FW or AC (One Continuous Absence) all such Continuous Absence is Summarized under Column A.

### Column A

### Under Storage Codes To Be Summarized

| Reason Due To   | Code  |            |
|---|-------|------------|
|   | Field | Full Field |
| 30—After 7 Full Calendar Days<br>(after On Duty Accidents)            | IS    | IS(1)      |
| Duty Accident—Full Tour   | AC    |            |
| 1) Covers Absence Due to<br>as after 7 Full Calendar<br>up to 30 Days |       |            |

### Column T

number of Times Today to be Summarized

number of Times Party

### Other Absence Codes

Not to be Summarized

| Absence Due To   | Codes |          |
|--|-------|----------|
|  | Paid  | Not Paid |
| Vacation   | VP    |          |
| Optional Holiday   | HX    |          |
| Optional Holiday—Originally Sched.   | HU    |          |
| Excused Work Day   | QX    | Q        |
| Excused Work Day—Originally Sched.   | QP    |          |
| Holiday  | HO    |          |
| Paid in Lieu of Vacation   | LOV   |          |
| Excused—up to 30 Days (Informal Leave)   | —     | E        |
| Excused—More than 30 days (Formal Leave)   | —     | LV       |
| Excused—Less than 30 days (Military Leave)   | —     | L        |
| Suspension   | —     | K        |
| Work Stoppage—Strikes  | —     | S        |
| Union Activity   | —     | U        |
| Union Act. Expected to Paid by Form 8270   | —     | UP       |
| Miscellaneous—Factor, Dental or Other Appointment, jury Duty—Witness, Duty—Quarantine—Death in Family—General Transportation Failure—Etc — up to 30 Days |       | NP M     |

| Absence Due To                  | Codes |          |
|---------------------------------|-------|----------|
|                                 | Paid  | Not Paid |
| Return to Limited Duty          |       |          |
| Eligible for Full Pay—          |       |          |
| Scheduled Time Not Worked       | PB    |          |
| Sixth or Seventh Scheduled Day  | FX    |          |
| Return to Limited Duty          |       |          |
| Eligible for Half Pay—          |       |          |
| Scheduled Time Not Worked       |       | P        |
| Sixth or Seventh Scheduled Day  |       | X        |
| Anticipated Disability Leave    |       | ADL      |
| Care for Newborn Children Leave |       | CNC      |

\*yes—Use "W" to indicate "Days Worked" when it is desired maintaining a record of such days for an Occasional employee.

**Absence of Less Than a Session are Not to be Summarized**—To indicate a session, draw diagonal (/) through square and enter code; Above diagonal indic

• 100  
• 100



**ATTACHMENT 4**



|     |     |        |    |               |    |         |         |         |        |       |
|-----|-----|--------|----|---------------|----|---------|---------|---------|--------|-------|
| Yr. | Mo. | Serial | PT | Voucher Class | St | Draft # | Study 1 | Study 2 | Edited | Cert. |
|-----|-----|--------|----|---------------|----|---------|---------|---------|--------|-------|

**H. Certification** I hereby certify that items, amounts and explanations herein listed or attached are true and correct and are due from the Company.

Signature [Signature] Date 06 / 16 / 92

Title Assistant Vice Pres.-Reg. ReDepartment Exec.

Name (Print) A. M. Lombardo

Address ☐ Temp. ☐ New ☒ Company Mail

150 South Monroe Street, Suite 400

Tallahassee, FL 32301

Telephone Number / Check Digit

(904) 222-0260

☒ Check here if your payroll RCO and GLC apply; otherwise, enter codes below:  
Responsibility Code Originating (RCO) Geographic Location Code (GLC)

**I. Approval**

Total Amount Approved

\$ 3,307.26 ✓

Signature

Date 06 / / 9

Title President-Florida

Name (Print) J. P. Lacher

Mgt Level Officer

Social Security Number / Check Digit

**J. Advance And Credit Card Data** Number

Cancel Advance ☐ Temporary ☐ Continuing Amount \$

If you used your Corporate Charge Card for any of these expenses, enter Amount Charged \$

Date of earliest charge / /

**K. Special Handling Instructions**

**Instructions** Report Management Travel Expenses on the reverse of this form. If all travel expense information is included on the reverse, leave Section L blank. Expenses not listed on the reverse must be listed in Section L below. Report Non-Management Travel Expenses in Section L. All Non-Travel Expenses except Conference and Business Meal Expenses, must be reported in Section L. Shaded Areas are for Voucher Office Use Only.

**L. Explanation Of Expenses** Use this section to explain employee non-travel expenses or travel expenses not listed on the reverse of this form. For additional space, attach a Form RF-2391-S.

| Date        | EXTC | Amount | Explanation   |
|-------------|------|--------|---|
|             |      |        | Spouse's expenses while attending Florida Telephone Association Annual Convention in Ocean Reef. Attendance deemed appropriate for business purposes: --lunch |
| 05-30       |      | 11.00  | --airfare   |
| 05-30       |      | 244.00 | --pro-rata share of \$104.86 dinner expense 5/30, Quay Rest.  |
| 05-30       |      | 34.95  | --recreational expense (golf). See hotel bill 112.35 charge   |
| 05-30       |      | 56.17  | --refreshment/Dolphin (see hotel 4.28 charge)   |
| 05-30       |      | 2.14   | --refreshment/Islander (see hotel 19.43 charge)   |
| 05-30       |      | 6.48   | --refreshment/Dolphin (see hotel 5.74 charge)   |
| 05-31       |      | 5.74   | --lunch/Dolphin (see hotel 8.24 charge)   |
| 05-31       |      | 8.24   | --dinner/Carysfort (see hotel 164.96 charge)  |
| 06-02       |      | 41.24  | --refreshment/room (see hotel 2.19 charge)  |
| 06-02       |      | 2.19   | --refreshments (see hotel 11.21 charge) Reef Lounge   |
| 06-03       |      | 11.21  | --refreshment/room (see hotel 2.19 charge)  |
| 06-03       |      | 2.19   | --lodging (spouse stayed to host 6/2 reception and attend honor banquet at company request; employee unable to attend due to meeting in Charlotte)            |
| 06-02       |      | 194.25 |   |
| Sheet Total |      | 619.80 |   |

Are these expenses to be charged to the certifier's RC, all JFC/EC(s), and any other codes as assigned for payroll purposes? ☐ Yes ☒ No  
If Yes, and no other information is required, leave Section M blank. Otherwise, complete Section M.

**M. Classification Data** (For additional classification lines, attach a Form RF-2391-S)

| EXTC | Amount                                      | Rel. Rpt. Code | FC     | EC | RC-C | GLC | Auth. Number | Supl. Data #1 | Supl. Data #2 | Bill To | VC |
|------|---|----------------|--------|----|------|-----|--------------|---------------|---------------|---------|----|
|      | 563.63                                      |                | 562888 |    |      |     |              |               |               |         |    |
|      | 56.17                                       |                | 5627   |    |      |     |              |               |               |         |    |
|      | (see page two for more classification data) |                |        |    |      |     |              |               |               |         |    |

SERIAL # DATE AMOUNT  
U1095 061692 3,307.26  
TOTAL 3,307.26

INVOICE # OR DESCRIPTION  
FORM RF-2391 DATED 06/16/92  
PAID TO LOMBARDO, A M  
ON JUN 30 92

Rec'd  
7/2/92  
to one

**A. Business Purpose** Enter the business purpose for your travel. Please explain the reasons clearly.

To attend Florida Telephone Association Annual Convention.

To attend 3-way regulatory meeting in Charlotte, NC.

Return trip.

**Itinerary**

| Date  | From City   | To City     |
|-------|-------------|-------------|
| 05-30 | Tallahassee | Miami       |
| 06-02 | Miami       | Charlotte   |
| 06-03 | Charlotte   | Tallahassee |

Were you away from home overnight? ☒ Yes ☐ No

If yes, begin by completing Section B

If no, begin by completing Section D

Expenses should be listed in the appropriate date column.

| Date              | 05-30 | 05-31 | 06-01 | 06-02 | 06-03 |  |  | Total | EXTC |
|-------------------|-------|-------|-------|-------|-------|--|--|-------|------|
| Breakfast         |       |       |       | 8.80  | 9.50  |  |  |       |      |
| Lunch             | 10.10 |       |       |       |       |  |  |       |      |
| Dinner            |       |       |       | 21.50 |       |  |  |       |      |
| Total Meal Amount | 10.10 |       |       | 30.30 | 9.50  |  |  | 49.90 |      |

**B. Meals For Self**

List on the right the amount you paid for meals for yourself only. If you paid for meals that included others, list the amount(s) in Section E below.

**C. Lodging** Did you pay for lodging? ☒ Yes ☐ No

If no, ☐ arranged for direct billing to Company.

☐ made personal arrangements.

If yes, enter lodging and related costs by the day on which they were paid. Please attach receipts for lodging.

|                      |        |        |        |      |       |  |  |        |  |
|----------------------|--------|--------|--------|------|-------|--|--|--------|--|
| Lodging              | 206.56 | 194.25 | 194.25 |      | 95.20 |  |  | 690.26 |  |
| Porter/Tips          | 8.00   |        |        | 3.00 | 8.00  |  |  | 19.00  |  |
| Laundry/Dry Cleaning |        |        |        |      |       |  |  |        |  |
| Telephone Calls      | 1.64   |        | 11.99  | 7.77 |       |  |  | 21.40  |  |

**D. Transportation**

1. Use the codes below to identify the primary mode of intercity travel:

- AT = Air - billed to Company      RC = Rental car  
AP = Air - paid by you (or charged to your credit card)      PC = Personal car  
SE = Bus, train or ship      WE = With other employee  
CC = Company car/Company plane      PA = Privately arranged  
PR = Personal vehicle, Rental Plan

2. Enter amount you paid for intercity public transportation and attach receipts.

3. If you paid for a rental car, enter the amounts and attach receipts.

4. If you used your personal car, enter by day the mileage, the rate per mile, and the amount to be reimbursed (plus a rate per mile).

5. Enter amounts you paid for parking at transportation terminal.

6. Enter amounts you paid for parking at destination city.

7. Enter amounts you paid for road tolls and ferry charges.

8. Enter amounts you paid for local taxi, bus or subway.

|                                    |        |  |  |       |        |  |  |        |  |
|------------------------------------|--------|--|--|-------|--------|--|--|--------|--|
| 1. Mode of Travel                  | AP     |  |  |       |        |  |  |        |  |
| 2. Intercity Public Transportation | 614.00 |  |  |       |        |  |  | 614.00 |  |
| 3. Rental Car                      |        |  |  |       | 170.67 |  |  | 170.67 |  |
| 4. Personal Car Mileage            |        |  |  |       |        |  |  |        |  |
| Personal Car Rate                  |        |  |  |       |        |  |  |        |  |
| Personal Car Amount                |        |  |  |       |        |  |  |        |  |
| 5. Transportation Terminal Parking |        |  |  |       | 25.00  |  |  | 25.00  |  |
| 6. Destination City Parking        |        |  |  |       |        |  |  |        |  |
| 7. Road Tolls                      | 2.00   |  |  | 2.00  |        |  |  | 4.00   |  |
| 8. Local Transportation            |        |  |  | 20.00 | 20.00  |  |  | 40.00  |  |

**E. Conference And Business Meal Expense**

In this section, list the costs you incurred in hosting conferences, business meals or refreshments for customers or fellow employees, or in attending business league meetings. Please explain the business purpose of each conference or business meal expense in Section G below.

|  |       |  |  |  |  |  |  |       |  |
|--|-------|--|--|--|--|--|--|-------|--|
| Conference Expense Excluding Entertainment |       |  |  |  |  |  |  |       |  |
| Conference Entertainment Expense           |       |  |  |  |  |  |  |       |  |
| Business Meals                             | 69.91 |  |  |  |  |  |  | 69.91 |  |
| Business League Meetings                   |       |  |  |  |  |  |  |       |  |

**F. Other Expenses**

|  |  |  |  |  |       |  |  |       |  |
|--|--|--|--|--|-------|--|--|-------|--|
| Traveler's Checks                              |  |  |  |  |       |  |  |       |  |
| Gas - Rental Car                               |  |  |  |  | 18.21 |  |  | 18.21 |  |
| Porter/tips (Other than with Lodging or Meals) |  |  |  |  |       |  |  |       |  |

1722.35 Sheet Total

**G. Explanation Of Conference And Business Meal Expenses.**

Specify types of meals, dates, cities/states, restaurants or serving establishments, attendees names and titles, and the business purpose.

If the business purpose is the same as that reported in Section A, it should not be repeated.

| Date  | Explanation   |
|-------|---|
| 05-30 | Dinner for self, Elise Nivica, Asst. Mgr.-Regl., Tallahassee, and spouse, at Quay Restaurant, Key Largo, while attending FTA conference and discussing FTA issues. (\$69.91, self & Nivica; \$34.95 spouse listed on front = 104.86 |
|       |   |
|       |   |
|       |   |
|       |   |



☐ BellSouth Services  
☒ Other:

**Employee Expense Voucher**  
**Supplemental Data**  
(Attach To Form RF-2301)

Page 2 of 2

**L. Explanation Of Expenses** Use this section to explain employee non-travel expenses or travel expenses not listed on the reverse of the RF-2391.

| Date        | BTC | Amount | Description   |
|-------------|-----|--------|---|
| 05-30       | ✓   | 56.18  | Recreational expense (golf) for self while attending FTA.<br>(Spouse's portion listed on front; see hotel charge of 112.15)   |
| 05-30       | ✓   | 2.14   | Refreshments at Dolphin Club for self (spouse's portion on front<br>see hotel charge of 4.28)   |
| 05-30       | ✓   | 12.95  | Refresh.: Islander Oyster Bar for self (spouse's portion on front<br>see hotel charge of 19.43) and E. Nivica, Asst. Mgr., Tall.  |
| 05-31       | ✓   | 144.45 | Recreational expense (golf) for self, J. P. Lacher, President-FI,<br>A. Carino, Reg. Rep., US INTELCO; and Tom Britt, No. Telcom..  |
| 05-31       | ✓   | 12.98  | Refreshments at Dolphin club for self, " " " "<br>while discussing FTA activities.  |
| 05-31       | ✓   | 32.72  | Lunch at Cafe for self and J. P. Lacher, President-FI, Miami,<br>while discussing regulatory issues.  |
| 05-31       | ✓   | 9.90   | Refreshments at Palm Court for self and J. P. Lacher, President-<br>Florida, Miami, while discussing regulatory issues.   |
| 05-31       | ✓   | 123.72 | Dinner at Caryfort Grille for self, Elise Nivica, Asst. Mgr.-Re<br>Alma Paurolo, Staff Asst-C&EA, Miami, while disussing FTA<br>events (spouse's portion of 41.24 listed on front). See<br>hotel charge of 164.96 |
| 05-31       | ✓   | 8.72   | Refreshments at Islander Oyster Bar for self and J. P. Lacher,<br>Pres.-FL, while discussing regulatory issues.   |
| 06-02       | ✓   | 211.13 | Drink refreshments at Southern Bell hosted reception for SB<br>FTA award recipients (see attached for list of honorees).  |
| 06-02       | ✓   | 164.83 | Food refreshments at above reception.   |
| 06-02       | ✓   | 141.24 | Flowers (corsages/boutineers, 6 ea) for honorees.   |
| 06-02       | ✓   | 40.13  | Bartender services for above reception.   |
| 06-03       | ✓   | 17.00  | Gratuity charge for maid service during FTA convention stay.  |
|             |     |        |   |
|             |     |        |   |
|             |     |        |   |
|             |     |        |   |
|             |     |        |   |
|             |     |        |   |
|             |     |        |   |
|             |     |        |   |
|             |     |        |   |
|             |     |        |   |
| Sheet Total |     | 965.11 |   |

### M. Classification Data

[illegible]



675 W Peachtree St NW  
Atlanta, Georgia 30308

For Reservations, call 404 579 1055  
For Emergency After Hours Service,  
call 1 800 777 7000  
(Your account ID is 1100) 000



675 W Peachtree St NW  
Atlanta, Georgia 30308

For Reservations, call 404 579 1055  
For Emergency After Hours Service,  
call 1 800 777 7000  
(Your account ID is 1100) 000

SALES PERSON: 52 ITINERARY/INVOICE NO. 0018816  
CUSTOMER NBR: 011000 QDAMJF

DATE: 28 MAY 92  
PAGE: 02

TO: LOMBARDO/A M SUITE 400  
150 S MONROE ST  
TALLAHASSEE FL 32301  
FED EX 28MAY/JUDY 904-222-0260

SALES PERSON: 52 ITINERARY/INVOICE NO. 0018816  
CUSTOMER NBR: 011000 QDAMJF

DATE: 28 MAY  
PAGE: 01

TO: LOMBARDO/A M SUITE 400  
150 S MONROE ST  
TALLAHASSEE FL 32301  
FED EX 28MAY/JUDY 904-222-0260

FOR: LOMBARDO/A M

REF: FF100000.

#F.3

CREDIT CARD IN YOUR NAME IS REQUIRED ID TO RENT CAR  
COMPANY OWNED LODGING SHOULD ALWAYS BE 1ST CHOICE  
HOTEL RESERVATIONS HANDLED BY FLORIDA TELEPHONE ASSOCIATION.  
25.00 SERVICE FEE APPLIES FOR REISSUE OR REFUND

MS  
UI-614  
UB-PK

FOR: LOMBARDO/A M

REF: FF100000.

#F.3

30 MAY 92 - SATURDAY  
AIR USAIR FLT:1747 ECONOMY SNACK  
LV TALLAHASSEE 835A EDP: 737-400  
AR MIAMI INTERNTL 944A NON-STOP  
RESERVED SEAT 15D  
CAR MIAMI INTERNTL NATIONAL CAR RENTAL 1-FULL SZ AUTO AC  
RETURN-08JUN TO-MELBOURNE FL UNLIMITED MILEAGE  
RATE-USD28.00 DAILY 0715006300A15LE  
CONFIRMATION NUMBER  
RATE IS SUBJ TO CHG  
CORP ID-5140007

02 JUN 92 - TUESDAY  
AIR USAIR FLT:3105 COACH  
OPERATED BY USAIR EXPRESS  
LV KEY WEST 700A EDP: DASH 8 TPORP  
AR MIAMI INTERNTL 745A NON-STOP  
RESERVED SEAT 4C  
AIR USAIR FLT:184 COACH BREAKFAST  
LV MIAMI INTERNTL 815A EDP: 737-400  
AR CHARLOTTE 1023A NON-STOP  
RESERVED SEAT 17C

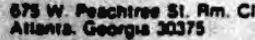
03 JUN 92 - WEDNESDAY  
AIR USAIR FLT:1253 ECONOMY EDP: 737 STRETCH  
LV CHARLOTTE 448P NON-STOP  
AR TALLAHASSEE 601P  
RESERVED SEAT 11D

AIR TICKETS US1385732053/54 LOMBARDO A M  
BILLED TO AT 614.00  
SUB TOTAL 614.00  
LESS AMOUNT BILLED TO CC 614.00  
TOTAL AMOUNT 0.00

WELLSOUTH TRAVEL SERVICES  
PASSENGER RECEIPT  
ARC 882  
XXXX  
LOMBARDO/A M  
ATLANTA  
CASA JF 14 JULY  
NOT VALID FOR THIS IS YOUR RECEIPT  
TRANSPORTATION  
LTD. CHANGES - RTH US A RIA US. 02 US CLTEL. 3LYA US  
FLN210.140AUS 55A.1A END  
24095092744 0 037 1385732053 0  
NOT VALID FOR TRAVEL  
0 037 1385732053 0  
4A11LL1554

CONTINUED ON PAGE 2





44-38861-11

पुनर्विचार

REF: FF100000,999999999,NF,3

Bubba - 7-11-77 - 11-11-77

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| TOTAL AMOUNT | 0. |
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. 62 END

AA11661554

DUAY RESTAURANT  
102050 OVERSEAS HWY  
KEY LARGO, FL 33037

TIME 10:35 PM DATE 05/30/92

ACT IN  
CITY DATES 9211  
NAME TITLE TAX  
TIME TITLE SALE  
VOLUME CODE 000031  
ISSUED BY 819  
SERIAL ID 009  
STREET NO 246  
STANDARD E 07403

**\$149.86**

TIP AMOUNT 25.00

TOTAL AMOUNT 174.86

- 70.00 Personal  
104.86 - guests paid  
their own way

AM LOMBARDI  
I AGREE TO PAY ABOVE TOTAL AMOUNT  
ACCORDING TO CARD ISSUER AGREEMENT  
THANK YOU  
COME AGAIN

$$\begin{array}{r} \text{YML} \\ \text{EN} \end{array} \} 69.91$$
  

$$\text{pouse } 34.45$$

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$$104.86$$
[illegible]

ALL INFORMATION CONTAINED HEREIN IS UNCLASSIFIED  
DATE 11-11-2004 BY 60322 UCBAW

| DATE SUB | RATE CLASS | F | MIN RENTAL DAYS |
|----------|------------|---|-----------------|
|----------|------------|---|-----------------|

|              |             |
|--------------|-------------|
| \$130.00/WHY | \$110.00/HB |
| \$150.00/5   |             |

4 2.435/GAL 17 KIFUEL 50 1.144/GAL

PAID BY AIR / 11/92 MONTH:00000000 + 750 000000

CUSTOMER CONFIRMED RENTAL AND SATISFACTION.  
YOUR SPECIAL CLUB INQUIRY IS:  
THANK YOU FOR RENTING WITH NATIONAL.

**COPY ONE**

• **INSIDE** **LIBR**

BP OIL COMPANY  
7131 OKEECHOBEE RD.  
FT. PIERCE FL.

15.9903 1.139 Reg Uni-Self 18.21  
GALLONS \$/GAL PUMP #07  
FUEL TICKET #072234

|          |             |       |
|----------|-------------|-------|
| ITEMS: 1 | SUBTOTAL    | 18.21 |
|          | SALES TAX   | 0.00  |
| TOTAL    |             | 18.21 |
| CHANGE   | Credit Card | 18.21 |
|          | DUE         | 0.00  |

0200c01s01t1 02:29:48pm Wed 03 Jun 92  
THANK YOU



# Guest Account

Hyatt Charlotte  
5501 Carnegie Boulevard  
Charlotte, North Carolina 28209-3462 USA  
704.554.1234 Telex 408482  
FAX: 704.554.8319

| Room | Rate | Arrive | Depart | Folio No. | Account | Affiliation | PF | ID | Page |
|------|------|--------|--------|-----------|---------|-------------|----|----|------|
|------|------|--------|--------|-----------|---------|-------------|----|----|------|

LOMBARDI TONY  
BELL SOUTH MEETING  
150 S. MONROE  
FALL HAVEN

11/92 06/49 100 100

RES. NO. 1 HH-102476-1

| Date             | Code | Reference | ID  | Description    | Charges     | Payments | Balance |
|------------------|------|-----------|-----|----------------|-------------|----------|---------|
| 0602             | 712  | 166       | XXX | 404-500-4482 U | 75          |          | 1 75    |
| 0602             | 712  | 165       | XXX | 404-420-8626 U | 75          |          | 2 50    |
| 0602             | 712  | 251       | XXX | 404-563-4482 U | 75          |          | 3 25    |
| 0602             | 712  | 306       | XXX | 404-847-8874 U | 75          |          | 4 00    |
| 0602             | 712  | 305       | XXX | GROUP ROOM     | 10.20       |          | 50 70   |
| 0602             | 811  | 406       | RJP | *ROOM TAX      |             |          | 98 90   |
| 0603             | 931  | EX11792   | KIR |                |             | -98.95   | 00      |
| TOTAL            |      |           |     |                | 98.95       | -98.95   | 00      |
| AMERICAN EXPRESS |      |           |     |                | 402/30/3819 |          |         |

Frequent Flyer account has been credited for this stay

Signature

I agree that my liability for this bill is not waived and I agree to be held personally liable in the event that the indicated person, company or association fails to pay for any part or the full amount of these charges.



LONGARDO TONY  
DELLSOUTH MEETING  
150 S. MONROE  
TALLAHASSEE FL

11/92 02:12 CAF 1/0  
\*\* DEPARTED \*\*

RES. NO.: HM-102472-1

|       |     |          |     |                |   |       |         |       |
|-------|-----|----------|-----|----------------|---|-------|---------|-------|
| 0602  | 712 | 160      | XXX | 904-224-7798   | 0 | .75   | } 3.75  | .75   |
| 0602  | 712 | 162      | XXX | 904-561-4482   | 0 | .75   |         | 1.50  |
| 0602  | 712 | 165      | XXX | 404-420-8624   | 0 | .75   |         | 2.25  |
| 0602  | 712 | 293      | XXX | 904-561-4482   | 0 | .75   |         | 3.00  |
| 0602  | 712 | 306      | XXX | 904-847-8874   | 0 | .75   |         | 3.75  |
| 0602  | 112 | Rm       | 408 | RJP GROUP ROOM |   | 85.00 | } 95.20 | 88.75 |
| 0602  | 811 | Rm       | 408 | RJP SHOOM TAX  |   | 10.20 |         | 98.95 |
| 0603  | 931 | Ex 11/92 | KIM |                |   |       | -98.95  | .00   |
| TOTAL |     |          |     |                |   | 98.95 | -98.95  | .00   |

AMERICAN EXPRESS

4320301989

Frequent Flyer account

has been credited for this stay.

Pay from copy; original lost.

Hyatt - Charlotte  
704-554-8319



**1**

| DATE    | DESCRIPTION              | AMOUNT | BALANCE |
|---------|--------------------------|--------|---------|
| 5/30/92 | TEMPORARY MEMBERSHIP PER | 12.31  |         |
| 5/30/92 | RESERVATION DEPOSIT      | 120.00 |         |
| 5/30/92 | GOALP                    | 112.23 |         |
| 5/30/92 | GOALPIN CLUB             | 40.28  |         |
| 5/30/92 | ISLAND AND TAY           | 150.25 |         |
| 5/30/92 | ISLAND ORTTER B&B        | 150.45 |         |
| 5/31/92 | GOALP                    | 140.45 |         |
| 5/31/92 | GOALPIN CLUB             | 5.70   |         |
| 5/31/92 | GOALPIN CLUB             | 6.20   |         |
| 5/31/92 | CAFE                     | 20.72  |         |
| 5/31/92 | PALE COURT               | 5.00   |         |
| 5/31/92 | ROOM AND TAX             | 150.25 |         |
| 5/31/92 | CAMPBELL CHILLIE B&B     | 140.25 |         |
| 5/31/92 | ISLAND ORTTER B&B        | 6.72   |         |
| 5/31/92 | ROOM AND TAX             | 150.25 |         |
| 5/31/92 | BAUMGART S&S - Drive     | 211.12 |         |
| 5/31/92 | DECONTATIONS - Floor     | 141.25 |         |
| 5/31/92 | BAUMGART S&S - Floor     | 140.25 |         |
| 5/31/92 | ROOM SERVICE             | 2.10   |         |
| 5/31/92 | VACAT S&S F&B B&B        | 150.25 |         |
| 5/31/92 | NEED LENSES              | 11.21  |         |
| 5/31/92 | ROOM SERVICE             | 2.10   |         |
| 5/31/92 | BAUMGART S&S             | 40.13  |         |
| 5/31/92 | MISCELLANEOUS CATERERS   | 17.00  |         |

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|---|---|
| MUST PRINT THE ACCOUNTS<br>PERSONAL OR ANY<br>OTHER BUSINESS<br>ADDRESS EXACTLY AS<br>APPEARING ON CARD<br>TELEPHONE NO. (OPTIONAL) | <b>TOTAL</b><br><br>MONEY FOR ALL<br>DEBTS AND PAID<br>VOUCHERS UNDER THIS ACCOUNT<br>IS NOT TRANSFERRED TO THE CREDITORS<br>OF THE DEBTOR. IT IS TO BE USED<br>ONLY FOR A CASH CREDIT ADVANCE, TO RUN THE BARRON'S TRADING ACADEMY |
|---|---|

86-15-42 01:47PM P002' B15

# 11

**1**

| DATE    | DESCRIPTION | AMOUNT | BALANCE      |
|---------|-------------|--------|--------------|
| 5/20/92 |             | 303    | 451.00-3     |
| 6/01/92 |             | 6106   | 904 545-4442 |
| 6/01/92 |             | 6106   | 904 225-7788 |
| 6/01/92 |             | 6106   | 440 418-8809 |
| 6/01/92 |             | 6106   | 440 312-5192 |
| 6/01/92 |             | 6106   | 440 428-8849 |
| 6/01/92 |             | 6106   | 303 538-5355 |
| 6/01/92 |             | 6106   | 904 941-4462 |
| 6/01/92 |             | 6106   | 303 538-5421 |
| 6/01/92 |             | 6106   | 440 328-8826 |
| 6/01/92 |             | 6106   | 440 312-5192 |
| 6/01/92 |             | 6106   | 303 538-5108 |
| 6/02/92 |             | 7938   | 904 225-4444 |
|         |             |        | 707P         |
|         |             |        | 815A         |
|         |             |        | 818A         |
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|         |             |        | 877A         |
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|---|--------------------------|-----------|------|
| PLEASE PRINT THE ACCOUNTS RECEIVABLE FROM OR ANY OTHER PERSONS, FIRMS, COMPANIES, OR INSTITUTIONS, TO WHOM YOU ARE OWING MONEY. | TOTALS                   | 1,0778.07 | 0.00 |
| AMOUNT DUE TO ALL OTHERS  | 81,778.07                |           |      |
| ANY ACCOUNT RECEIVABLES OWED TO BANK OR TO OTHERS FOR INVESTMENT  |                          |           |      |
| ACT TO A SERVICE OBTAINED SOCIAL, TO TRANSFER FROM THE OTHER ACCOUNT  | PLEASE PRINT THE ACCOUNT |           |      |

Ray from copy; original lost.

06-15 52 01.47PM 700, 815

info to Vanner +  
Anthony 6/1

**FTA AWARD RECIPIENTS:**

**HALL OF FAME-HONORARY MEMBER\***

Roger Strickland

Tel.:

**HUMANITARIAN**

Ricky F. Nolan  
Service Technician  
c/o Thelma Cofone

Tel:

**COMMUNITY SERVICE**

Pat Caruso  
Service Technician  
Room 1306  
8601 North Sunrise Boulevard  
Plantation, FL  
Tel: 305-476-2756

**HUMANITARIAN**

Roy A. Fussell  
Electronics Technician  
Room 622 - Translation  
424 Pearl Street  
Jacksonville, FL 32202  
Tel: 904-350-4529

**COMMUNITY SERVICE**

Edward Morreale  
Assistant Manager-Network

Tel

**COMMUNITY SERVICE**

Noreen Chervinski  
Asst. Mgr.-RSC  
Room 525  
666 NW 79th Avenue  
Miami, FL 33126  
305-263-5219

\*Roger Strickland not attending. Troy Todd, Chairman, United Telephone accepting award for Roger (at Roger's request).

**TUESDAY, JUNE 2**

6:00 p.m. Private Southern Bell reception at Tony's suite  
for award recipients (Room 306, Marlin Building)

**Award Recipients**

Ed Morreale (Pensacola)  
Pat Caruso (Plantation)  
Noreen Chervinski (Miami)

Ricky Noland (Lake Worth)

Roy Fussell (Jacksonville)

**Guests**

Venice Morreale (wife)  
Margaret Caruso (mother)  
Ron Chervinski (husband)  
Alfonso Jugo (Chervinski's svr)  
Debbie Jugo (Alfonso's wife)  
Cissy Nolan (wife)  
George Lewis (Ricky's OM)  
Susy Lewis (George's wife)  
Martha Fussell (wife)

7:00 pm President's Reception (sponsored by FTA Affiliate Members)

8:00 pm "Black & White Nite" Annual Banquet & Dance

**IMPORTANT: DRESS IS BLACK AND WHITE FOR ALL ATTENDEES**  
(Many will be wearing tux...)

*Y. Sinai*  
BOLD BY



**BP OIL**

**Thank You  
Come Back Again**

PURCHASE RECEIPT  
EXP: 06-30-92  
ST DIRECT  
P.O. BOX 11,800

**CUSTOMER COPY**

INVT 1429530025 N SALES TAX @ 0.00

**NOTICE TO BUYER-Do not sign before reading. Retain this copy. You may at any time pay the full balance. Buyer hereby acknowledges receipt of a true and correct copy of this agreement.**

18.2°



# OCEAN REEF CLUB

## GOLF COURSE

| DATE    |              | SERVED BY |     |       |  |
|---------|--------------|-----------|-----|-------|--|
| 5-31-92 |              | BAS       |     | 01602 |  |
| 3       | GREEN FEES   | 335       | 90  | -     |  |
| 3       | CART RENTAL  | 336       | 45  | -     |  |
|         | CLUB STORAGE | 341       |     |       |  |
|         | CLUB RENTAL  | 339       |     |       |  |
|         |              |           |     |       |  |
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|         |              | SUB-TOTAL | 135 | -     |  |
|         |              | TAX       | 9   | 45    |  |
|         |              | TOTAL     | 144 | 45    |  |

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49.90 +
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194.25 +
619.80 0
... 0.00
619.80 *
0.*M
619.80**

```

56.18 +  
2.14 +  
12.95 +  
144.45 +  
32.72 +  
9.90 +  
123.72 +  
8.72 +  
211.13 +  
164.83 +  
141.24 +  
40.13 +  
17.00 +  
965.11 0  
• 0.00  
965.11 \*  
0.\*M



# OCEAN REEF CLUB

CATERING



|                                    |                      |                |                  |
|------------------------------------|----------------------|----------------|------------------|
| NO. 18163                          | DATE<br>June 2, 1992 | DAY<br>Tuesday | ACCOUNT #<br>636 |
| ORGANIZATION<br>Southern Bell      |                      |                |                  |
| ACCOUNT #<br>Lombardo Acct. #17446 |                      |                |                  |

|                |     |    |
|----------------|-----|----|
| Flowers        |     |    |
| 6 Corsages     |     |    |
| @ \$18.50 each | 111 | 00 |
| 6 Boutinners   |     |    |
| @ \$3.50 each  | 21  | 00 |
| SUB-TOTAL      | 132 | 00 |
| SERVICE CHARGE | n/a |    |
| SUB-TOTAL      | 132 | 00 |
| TAX            | 9   | 24 |
| TOTAL          | 141 | 24 |

SIGNATURE



# OCEAN REEF CLUB

CATERING

|                               |                           |                    |           |
|-------------------------------|---------------------------|--------------------|-----------|
| DATE<br>JUNE 2, 1992          |                           | DAY<br>TUESDAY     | NO. 16334 |
| ORGANIZATION<br>SOUTHERN BELL |                           | ACCOUNT #<br>17446 |           |
| 28                            | cocktails consumed @ 4.50 | 156                | 00        |
| 6                             | beer consumed @ 4.50      |                    |           |
| 9                             | wine consumed @ 4.50      | 40                 | 50        |
| Sailfish Room                 |                           |                    |           |
| Dinner for 312 N. 17th St.    |                           |                    |           |
| SUB-TOTAL                     |                           | 1606               | 50        |
| SERVICE CHARGE                |                           | 30                 | 81        |
| SUB-TOTAL                     |                           | 197                | 31        |
| TAX                           |                           | 13                 | 82        |
| TOTAL                         |                           | 211                | 13        |

*A. M. Lombardo*  
SIGNATURE



*V. M. L. L.*

[illegible]

## OCEAN REEF CLUB



## CATERING

NO. 18250

|                               |  |                                   |
|-------------------------------|--|-----------------------------------|
| DATE<br>June 2, 1992          | DAY<br>Tuesday   | BEO #<br>636                      |
| ORGANIZATION<br>Southern Bell |  | ACCOUNT #<br>Lombardo Acct #17446 |
|                               | Honorees Reception Hors D'Oeuvres                                |                                   |
|                               | Small Crudite w/creamy dill dip<br>and Cheeseboard w/Fresh Fruit |                                   |
| @ \$106.00                    |  | 106 00                            |
| Mixed Nuts                    |  |                                   |
| @ \$16.50                     |  | 16 50                             |
| Pretzels                      |  |                                   |
| @ \$7.50                      |  | 7 50                              |
|                               |  |                                   |
|                               |  |                                   |
|                               |  |                                   |
|                               | SUB-TOTAL  | 130 00                            |
|                               | SERVICE CHARGE   | 24 05                             |
|                               | SUB-TOTAL  | 154 05                            |
|                               | TAX  | 10 78                             |
|                               | TOTAL  | 164 83                            |

T. W. H. L.  
SIGNATURE

Payment in 12 equal, and interest charged each day, based on the daily amount of the outstanding  
Any amount remaining unpaid at the end of the 12th day will be subject to a service charge equal

Dean Reef  
on vacation  
4 drink  
water



Southern Bell  
A BELL SOUTH Company

10 people  
@ reception

29 cocktails  
@ \$4/p.c.

Judy Paul  
Suite 400, 150 South Monroe Street  
Tallahassee, Florida 32301  
(904) 224-9561

**KEY LARGO, FLORIDA**

MR. A.M. LOMBARDO  
160 ROSEHILL DRIVE W  
TALLAHASSEE, FL

**32301**

**XH**

31 OCEAN REEF DRIVE  
KEY LARGO, FLORIDA 33037

17446

6/06/92

1

| DATE    | REFERENCE | DESCRIPTION              | AMOUNT    | REMARKS              |
|---------|-----------|--------------------------|-----------|----------------------|
| 5/30/92 |           | TEMPORARY MEMBERSHIP FEE | 12.31     |                      |
| 5/30/92 |           | RESERVATION DEPOSIT      | 128.00    |                      |
| 5/30/92 | 1581      | GOLF                     | 112.35    | 56.15 AML, BL        |
| 5/30/92 | 18915     | DOLPHIN CLUB             | 4.28      | 56.17 refresh TL, BL |
| 5/30/92 | 306H      | ROOM AND TAX             | 194.25    | refresh TL, BL       |
| 5/30/92 | 972670    | ISLANDER OYSTER BAR      | 19.42     | refresh TL, BL       |
| 5/31/92 | 1602      | GOLF                     | 144.45    | AML, JPL, L          |
| 5/31/92 | 18924     | DOLPHIN CLUB             | 8.74      | refresh TL, BL       |
| 5/31/92 | 18927     | DOLPHIN CLUB             | 8.24      | refresh TL, BL       |
| 5/31/92 | 220454    | CAFE                     | 32.72     | refresh TL, BL       |
| 5/31/92 | 221455    | PALM COURT               | 9.90      | refresh TL, BL       |
| 5/31/92 | 306H      | ROOM AND TAX             | 194.25    | dinner, AML          |
| 5/31/92 | 432742    | CARYSPORT GAILLE         | 164.98    | refresh. AML         |
| 5/31/92 | 572411    | ISLANDER OYSTER BAR      | 8.72      | refresh. AML         |
| 6/01/92 | 306H      | ROOM AND TAX             | 194.25    | drink                |
| 6/02/92 | 16334     | BANQUET SALES            | 211.13    | refresh. at 50%      |
| 6/02/92 | 18163     | DECORATIONS              | 141.24    | refresh. at 50%      |
| 6/02/92 | 18250     | BANQUET SALES            | 164.83    | refresh. at 50%      |
| 6/02/92 | 344002    | ROOM SERVICE             | 2.19      | refresh. at 50%      |
| 6/02/92 | 8YA028    | YACHTSMAN'S INN RENTAL   | 194.25    | refresh. at 50%      |
| 6/03/92 | 338030    | REEF LOUNGE              | 11.21     |                      |
| 6/03/92 | 351786    | ROOM SERVICE             | 2.19      |                      |
| 6/04/92 | 16341     | BANQUET SALES            | 40.13     | Barkman 6            |
| 6/05/92 |           | MISCELLANEOUS GRATUITIES | 17.00     | maid svc             |
|         |           | TELEPHONE CHARGES        |           |                      |
|         |           | NUMBER                   | TIME MINS |                      |
| 5/30/92 | 6306      | 305 852-8315             | 7:30      | 1                    |
|         |           |                          | TOTALS    |                      |

PLEASE NOTIFY THE ACCOUNTS  
RECEIVABLE DEPT. OF ANY  
ERRORS IMMEDIATELY  
TELEPHONE (800) 27-9622

**PAYMENT FOR ALL  
GOODS AND SER-  
VICES CHARGED UNDER THIS ACCOUNT  
IS DUE UPON RECEIPT OF THIS STATEMENT.  
YES AFTER THE BILLING DATE WILL BE SUB-  
1% PER MONTH OF THE UNPAID AMOUNT.**

**CONTINUED**

**PLEASE PAY ▲ THIS AMOUNT**



# STATEMENT



## OCEAN REEF CLUB

KEY LARGO, FLORIDA

MR. A.M. LOMBARDO  
160 ROSEHILL DRIVE W  
TALLAHASSEE, FL

31 OCEAN REEF DRIVE  
KEY LARGO, FLORIDA 33037

17446

6/06/92

2

XH

| DATE    | REFERENCE | DESCRIPTION          | AMOUNT | PAID     | BALANCE |
|---------|-----------|----------------------|--------|----------|---------|
| 5/30/92 | 6306      | 305 451-0943 747P 1  | .82    |          | 1.64    |
| 6/01/92 | 6306      | 904 561-4482 815A 2  | 1.09   |          |         |
| 6/01/92 | 6306      | 704 224-7798 818A 3  | 1.09   |          |         |
| 6/01/92 | 6306      | 404 420-8069 822A 1  | 1.09   |          |         |
| 6/01/92 | 6306      | 404 529-5192 824A 10 | 1.09   |          |         |
| 6/01/92 | 6306      | 404 420-8069 837A 6  | 1.09   |          |         |
| 6/01/92 | 6306      | 305 530-5555 423P 2  | 1.09   |          | 11.99   |
| 6/01/92 | 6306      | 904 561-4482 426P 3  | 1.09   |          |         |
| 6/01/92 | 6306      | 305 530-5421 439P 3  | 1.09   |          |         |
| 6/01/92 | 6306      | 404 420-8626 447P 1  | 1.09   |          |         |
| 6/01/92 | 6306      | 404 529-5192 449P 6  | 1.09   |          |         |
| 6/01/92 | 6306      | 305 530-5300 523P 4  | 1.09   |          |         |
| 6/02/92 | 7938      | 904 224-4044 305P 4  | 4.02   |          | 4.02 BL |
| TOTALS  |           |                      |        | 1,779.67 | .00     |

PLEASE NOTIFY THE ACCOUNTS  
RECEIVABLE DEPT. OF ANY  
ERRORS IMMEDIATELY  
TELEPHONE (904) 597-8888

PAYMENT FOR ALL  
GOODS AND SER-  
VICES CHARGED UNDER THIS ACCOUNT  
IS DUE UPON RECEIPT OF THIS STATEMENT  
ANY AMOUNT REMAINING UNPAID 30 DAYS AFTER THE BILLING DATE WILL BE SUB-  
JECT TO A SERVICE CHARGE EQUAL TO 1% PER MONTH OF THE UNPAID AMOUNT.

**\$1,779.67**  
PLEASE PAY THIS AMOUNT



*Carina NC?*  
*M.*

| <u>5/30</u>  | <u>5/31</u> | <u>6/1</u> | <u>6/2</u> | <u>6/3</u> |
|--|-------------|------------|------------|------------|
| 10 <sup>10</sup><br>11 <sup>22</sup><br>104 <sup>0</sup> ① | —           | —          | 8.89 /     | 9.50 /     |
| —  | —           | —          | — /        | — /        |
| —  | —           | —          | 4.24 /     | —          |
| —  | —           | —          | —          | 25.22 /    |
| —  | —           | —          | 3.00 /     | 8.33 /     |
| —  | —           | —          | —          | —          |
| —  | —           | —          | 2.00 /     | 2.50 /     |
| —  | —           | —          | 2.00 /     | —          |

*Hodgson in NC?*  
*Hypert Charlotte*  
*704-554-1234*  
*704-554-8300*  
*Steph*  
*Kids*

① Dinner for self, special and Shad M...  
34.95 - 02  
63.91 - 0-00

*Tournament  
pd. w/ Regis*

Regional Reg:  
Carina USINTELCO Networks

Tom Britt Northern Telecom Dist. Sales Mgr.  
INF. 100.0

## STATEMENT



OCEAN REEF CLUB

KEY LARGO, FLORIDA

MR. A.M. LOMBARDO  
160 ROSEHILL DRIVE W  
TALLAHASSEE, FL

32301

XH

31 OCEAN REEF DRIVE  
KEY LARGO, FLORIDA 33037

ACCOUNT NO.

17446

TRANSACTIONS FOR  
PERIOD ENDING

6/06/92

PAGE

1

| DATE    | REFERENCE | DESCRIPTION              | CURRENT TRANSACTIONS | PREVIOUS STATEMENTS |
|---------|-----------|--------------------------|----------------------|---------------------|
| 5/30/92 |           | TEMPORARY MEMBERSHIP FEE | 12.31                |                     |
| 5/30/92 |           | RESERVATION DEPOSIT      | 128.00CR             |                     |
| 5/30/92 | 1581      | GOLF                     | 112.35               |                     |
| 5/30/92 | 18915     | DOLPHIN CLUB             | 4.28                 |                     |
| 5/30/92 | 306M      | ROOM AND TAX             | 194.25               |                     |
| 5/30/92 | 572670    | ISLANDER OYSTER BAR      | 19.43                |                     |
| 5/31/92 | 1602      | GOLF                     | 144.45               |                     |
| 5/31/92 | 18924     | DOLPHIN CLUB             | 5.74                 |                     |
| 5/31/92 | 13927     | DOLPHIN CLUB             | 8.24                 |                     |
| 5/31/92 | 220454    | CAFE                     | 32.72                |                     |
| 5/31/92 | 221455    | PALM COURT               | 9.90                 |                     |
| 5/31/92 | 306M      | ROOM AND TAX             | 194.25               |                     |
| 5/31/92 | 432742    | CARYSFORT GRILLE         | 164.96               |                     |
| 5/31/92 | 572411    | ISLANDER OYSTER BAR      | 8.72                 |                     |
| 6/01/92 | 306M      | ROOM AND TAX             | 194.25               |                     |
| 6/02/92 | 16334     | BANQUET SALES            | 211.13               |                     |
| 6/02/92 | 18163     | DECORATIONS              | 141.24               |                     |
| 6/02/92 | 18250     | BANQUET SALES            | 164.83               |                     |
| 6/02/92 | 344002    | ROOM SERVICE             | 2.10                 |                     |
| 6/02/92 | 3YA02B    | YACHTSMAN'S INN RENTAL   | 194.25               |                     |
| 6/03/92 | 338032    | REEF LOUNGE              | 11.21                |                     |
| 6/03/92 | 351786    | ROOM SERVICE             | 2.19                 |                     |
| 6/04/92 | 16341     | BANQUET SALES            | 40.13                |                     |
| 6/05/92 |           | MISCELLANEOUS GRATUITIES | 17.00                |                     |
|         |           | TELEPHONE CHARGES        |                      |                     |
|         |           | NUMBER TIME MINS         |                      |                     |
| 5/30/92 | 6306      | 305 852-9315 743P 1      | .82                  |                     |
| TOTALS  |           |                          |                      |                     |

PLEASE NOTIFY THE ACCOUNTS  
RECEIVABLE DEPT. OF ANY  
ERRORS IMMEDIATELY  
TELEPHONE (904) 367-8828

PAYMENT FOR ALL  
GOODS AND SER-  
VICES CHARGED UNDER THIS ACCOUNT  
IS DUE UPON RECEIPT OF THIS STATEMENT.

ANY AMOUNT REMAINING UNPAID 30 DAYS AFTER THE BILLING DATE WILL BE SUB-  
JECT TO A SERVICE CHARGE EQUAL TO 1% PER MONTH OF THE UNPAID AMOUNT.

CONTINUED

PLEASE PAY ↑ THIS AMOUNT

# OCEAN REEF CLUB

KEY LARGO, FLORIDA

MR. A.M. LOMBARDO  
160 ROSEHILL DRIVE W  
TALLAHASSEE, FL

31 OCEAN REEF DRIVE  
KEY LARGO, FLORIDA 33037

ACCOUNT NO.

17446

TRANSACTIONS FOR  
PERIOD ENDING

6/06/92

PAGE

2

XH

| DATE    | REFERENCE | DESCRIPTION          | CURRENT TRANSACTIONS | PREVIOUS STATEMENTS |
|---------|-----------|----------------------|----------------------|---------------------|
| 5/30/92 | 6306      | 305 451-0943 747P 1  | .82                  |                     |
| 6/01/92 | 6306      | 904 561-4482 815A 2  | 1.09                 |                     |
| 6/01/92 | 6306      | 904 224-7798 818A 3  | 1.09                 |                     |
| 6/01/92 | 6306      | 404 420-8069 822A 1  | 1.09                 |                     |
| 6/01/92 | 6306      | 404 529-5192 824A 10 | 1.09                 |                     |
| 6/01/92 | 6306      | 404 420-8069 837A 6  | 1.09                 |                     |
| 6/01/92 | 6306      | 305 530-5555 423P 2  | 1.09                 |                     |
| 6/01/92 | 6306      | 904 561-4482 426P 3  | 1.09                 |                     |
| 6/01/92 | 6306      | 305 530-5421 439P 3  | 1.09                 |                     |
| 6/01/92 | 6306      | 404 420-8626 447P 1  | 1.09                 |                     |
| 6/01/92 | 6306      | 404 529-5192 449P 6  | 1.09                 |                     |
| 6/01/92 | 6306      | 305 530-5300 523P 4  | 1.09                 |                     |
| 6/02/92 | 7938      | 904 224-4044 305P 4  | 4.02                 |                     |

PLEASE NOTIFY THE ACCOUNTS  
RECEIVABLE DEPT. OF ANY  
ERRORS IMMEDIATELY  
TELEPHONE (308) 387-8928

TOTALS

1,779.67

.00

PAYMENT FOR ALL  
GOODS AND SER-  
VICES CHARGED UNDER THIS ACCOUNT  
IS DUE UPON RECEIPT OF THIS STATEMENT.

\$1,779.67

ANY AMOUNT REMAINING UNPAID 30 DAYS AFTER THE BILLING DATE WILL BE SUB-  
JECT TO A SERVICE CHARGE EQUAL TO 1% PER MONTH OF THE UNPAID AMOUNT.

PLEASE PAY ↓ THIS AMOUNT



OCEAN REEF CLUB

KEY LARGO, FLORIDA

PLEASE RETURN THIS PORTION WITH YOUR REMITTANCE  
MAKE CHECKS PAYABLE TO: OCEAN REEF CLUB INC.

17446

17446

ACCOUNT NO.

6/06/92

BILLING DATE

1,779.67

TOTAL AMOUNT DUE

AMOUNT REMITTED

ILL IN NEW ADDRESS IF CHANGED





# OCEAN REEF CLUB

KEY LARGO, FLORIDA  
 P.O. BOX 100000  
 100 ROSEHILL DRIVE N  
 TALLAHASSEE, FL

5 OCEAN REEF DRIVE  
 KEY LARGO, FLORIDA 32909

|         |
|---------|
| 17000   |
| 4/00/92 |
| 1       |

20301

EN

|                   |        |                          |        |     |
|-------------------|--------|--------------------------|--------|-----|
| 4/10/92           |        | TEMPERARY MEMBERSHIP FEE | 22.31  |     |
| 5/10/92           |        | RESERVATION DEPOSIT      | 120.00 |     |
| 5/10/92           | 1501   | GOLF                     | 112.30 |     |
| 5/10/92           | 10915  | DOLPHIN CLUB             | 4.20   |     |
| 5/10/92           | 3064   | ROOM AND TAX             | 196.25 |     |
| 5/10/92           | 972670 | ISLANDER OYSTER BAR      | 19.43  |     |
| 5/11/92           | 1602   | GOLF                     | 164.45 |     |
| 5/11/92           | 10924  | DOLPHIN CLUB             | 5.74   |     |
| 5/11/92           | 10927  | DOLPHIN CLUB             | 5.24   |     |
| 5/11/92           | 220494 | CAFE                     | 21.72  |     |
| 5/11/92           | 221493 | PALM COURT               | 9.90   |     |
| 5/11/92           | 3064   | ROOM AND TAX             | 196.25 |     |
| 5/11/92           | 432742 | CANYONPORT GRILLE        | 164.96 |     |
| 5/11/92           | 972611 | ISLANDER OYSTER BAR      | 8.72   |     |
| 6/01/92           | 3064   | ROOM AND TAX             | 196.25 |     |
| 6/02/92           | 16334  | BANQUET SALES            | 211.13 |     |
| 6/02/92           | 10163  | DECORATIONS              | 141.24 |     |
| 6/02/92           | 10250  | BANQUET SALES            | 164.03 |     |
| 6/02/92           | 344002 | ROOM SERVICE             | 2.19   |     |
| 6/02/92           | 074020 | YACHTMAN'S INN RENTAL    | 196.25 |     |
| 6/03/92           | 330030 | REEF LCLPIDE             | 11.21  |     |
| 6/03/92           | 391706 | ROOM SERVICE             | 2.19   |     |
| 6/04/92           | 14341  | BANQUET SALES            | 40.13  |     |
| 6/05/92           |        | MISCELLANEOUS GRATUITIES | 17.00  |     |
| TELEPHONE CHARGES |        |                          |        |     |
|                   |        | NUMBER                   | TIME   | MIN |
| 5/10/92           | 4304   | 304 053-0310             | 7:00   | 1   |
| TOTALS            |        |                          | 17000  |     |

*removed*

PLEASE NOTIFY THE ACCOUNTS  
 RECEIVABLE DEPT. OF ANY  
 CHANGES IMMEDIATELY  
 TELEPHONE (904) 820-0200

REVENUE FOR ALL  
 ROOMS AND GOLF  
 THIS CHARGED UNDER THIS ACCOUNT  
 IS DUE UPON RECEIPT OF THIS STATEMENT  
 ANY AMOUNT REMAINING UNPAID 30 DAYS AFTER THE BILLING DATE WILL BE SUB-  
 JECT TO A SERVICE CHARGE EQUAL TO 1% PER MONTH OF THE UNPAID AMOUNT.

CONTAINER  
 PLEASE PAY THIS AMOUNT



# OCEAN REEF CLUB

KEY LARGO, FLORIDA

PLEASE RETURN THIS PORTION WITH YOUR REMITTANCE  
 MAKE CHECKS PAYABLE TO: OCEAN REEF CLUB INC.

|  |  |  |
|--|--|--|
|  |  |  |
|  |  |  |
|  |  |  |

FILL IN NEW ADDRESS IF CHANGED



ALL INFORMATION CONTAINED HEREIN IS UNCLASSIFIED

STATEMENT



OCEAN REEF CLUB

KEY LARGO, FLORIDA

IN OCEAN REEF CLUB  
KEY LARGO, FLORIDA 33057

MR. A.M. LOMBARD  
160 ROSEHILL DRIVE W  
TALLAHASSEE, FL

17446  
6/06/92

| DATE    | MEMBER NO. | ROOM NO. | ROOM TYPE | RATE | TAX | TOTAL |
|---------|------------|----------|-----------|------|-----|-------|
| 5/30/92 | 6306       | 305      | 401-0965  | 7475 | 1   | 0.02  |
| 6/01/92 | 6306       | 705      | 561-4482  | 819A | 2   | 1.09  |
| 6/01/92 | 6306       | 705      | 824-7798  | 810A | 3   | 1.09  |
| 6/01/92 | 6306       | 404      | 420-0069  | 822A | 1   | 1.09  |
| 6/01/92 | 6306       | 404      | 559-5192  | 824A | 10  | 1.09  |
| 6/01/92 | 6306       | 404      | 420-0069  | 827A | 6   | 1.09  |
| 6/01/92 | 6306       | 305      | 530-5595  | 423P | 2   | 1.09  |
| 6/01/92 | 6306       | 704      | 561-4482  | 426P | 3   | 1.09  |
| 6/01/92 | 6306       | 305      | 530-5421  | 459P | 3   | 1.09  |
| 6/01/92 | 6306       | 404      | 420-5626  | 447P | 1   | 1.09  |
| 6/01/92 | 6306       | 404      | 559-5192  | 449P | 6   | 1.09  |
| 6/01/92 | 6306       | 305      | 530-5595  | 523P | 4   | 1.09  |
| 6/02/92 | 7998       | 704      | 561-4482  | 305P | 4   | 4.02  |

PLEASE NOTIFY THE ACCOUNTS  
RECEIVABLE DEPT OF ANY  
CHANGES IMMEDIATELY  
TELEPHONE (904) 99-0011

STATEMENT FOR ALL  
ROOMS AND  
YOUR SERVICES UNDER THIS ACCOUNT  
IS DUE IMMEDIATELY UPON RECEIPT OF THIS STATEMENT  
ANY ACCOUNT REMAINING UNPAID 30 DAYS AFTER THE BILLING DATE WILL BE SUB-  
JECT TO A SERVICE CHARGE EQUAL TO 10% PER MONTH OF THE UNPAID AMOUNT.

TOTALS 1,779.67

PLEASE PAY THIS AMOUNT



OCEAN REEF CLUB

KEY LARGO, FLORIDA

PLEASE RETURN THIS PORTION WITH YOUR REMITTANCE  
MAKE CHECKS PAYABLE TO: OCEAN REEF CLUB INC

17446

17446 6/06/92 1,779.67

**Combats**  
**OCEAN REEF CLUB**

## AT FOOD AND BEVERAGE

## YOUR SERVERS

**33803**

1 : 1647 10/9 4. 33024

U.S. AIR FORCE

7.000 7.000

17.00 1.50

REF ID: A66111 11.21

17446

104 00 519 57.5 WIO 0: 4 33.02  
M 05 47:37 58 357

TIP 1.32 TAX 8.00 17.32 1.32

[illegible]

MAJ-4 11.21

7-10-68

Proceeding under the plan straightens out priority (if not previously set) before cases come to court. **4.1**

**CLASSIFIED BY: 6032 JEP/DAW**

THOMAS H. HARRIS



*[Signature]*

... for all people and countries alike.

...the ... of the ...

...and the ...



For use of all goods and services obtained under this Agreement in the event of the occurrence of the events described herein, the Licensee shall be required to assign to the Licensor all rights in and to the goods and services obtained under this Agreement.



# OCEAN REEF CLUB

FOOD AND BEVERAGE

YOUR SERVER(S) \_\_\_\_\_

0  
3  
5  
1  
7  
0  
0

35178

11/13/72 11:13:27 06/10/72 H. 311

CASH SERVER 15: H11110R

1 0 0000 1.75  
TAX .00  
17/10 0000 1.75

CHECK 351784 DELETED

TIPS 17.5000 1.75  
TAX 1.75

NEW! TVE 2.10  
POSTAL/POSTING OFFLINE  
ACT 0 12466  
ACCT TYPE 00 510 1110 01 01 01 01  
P 001 1 06 01 01 01 01 01  
TVE TIP 31 TAX 1.75 1.75 1.75

1 00 17 1.75 1.75 1.75  
1 01 01 1.75 1.75 1.75  
TOTAL 1.75 1.75 1.75 1.75 1.75  
CHANGE A 2.10 BALANCE .00  
1 06 11 13:27 06/10/72 H. 311

Providing sales tax plus standard  
and gratuity (if not specified) are  
added when check is issued.

CASH TIPS - "CASH" in the  
space below.

CHECK TIPS - Write the % or \$  
amount.

306 m  
Lombardo  
17446

For all goods and services charges under this contract to the same extent of this statement  
and returning within 30 days after the date of the contract to a service charge equal to  
the amount of the original contract.



|  |           |                     |              |   |  |
|--|-----------|---------------------|--------------|---|--|
| Cardmember Account Number  |           | PLEASE WRITE FIRMLY |              | EXPIRATION DATE CHECKED <input checked="" type="checkbox"/> |  |
| Store No.  | Dept. No. | Salesperson         | Register No. | Approval Code   |  |
| Dept.  | Qty.      | Articles            | AMOUNT       | 77.29   |  |
|  |           |                     | AMOUNT       |   |  |
|  |           |                     | AMOUNT       |   |  |
| SHIP TO: Name (print)  |           |                     | SUB TOTAL    | 77.29   |  |
| Address  |           |                     | TAX          | 4.96  |  |
| City, State, Zip   |           |                     | TOTAL        | 82.25   |  |
| Merchandise and/or service purchased on this card shall not be resold or assumed for cash refund. Establishment agrees to transmit to American Express Travel Related Services Co., Inc. or authorized representative for payment. |           |                     | Dollars      | Cents   |  |

Cardmember Signature: *[Signature]*

Cardmember Copy

890407 Invoice Number

895287808996

1 RICCHI  
1228 19TH STREET NW  
WFO INSTON, DC 20036

03/02/93

TIME 11:22 AM DATE 03/02/93  
DOC#  
EXP DATE 9511  
CPE TYPE 91  
TRF TYPE SALE  
DATA CODE 25  
EXPI 015  
EXP IN 024  
EXP IN 01  
EXP IN 0050

16.00  
92.40

AMOUNT 6201.88

AMOUNT 35.00

AMOUNT 236.65  
- 115.00 - 9.00  
121.65

*[Signature]*



# Travel Expense Diary

FD-224 (1-87)  
Reverse

**A. Business Purpose** Enter the business purpose for your travel. Please explain the reasons clearly.

To attend National Association of Regulatory Utility Commissioners  
Winter Committee meetings and return in connection with regulatory  
responsibilities.

Itinerary

Date

From City

To City

02-27

Tallahassee

Wash., DC

03-04

Wash., DC

Tallahassee

Were you away from home overnight? ☒ Yes ☐ No

If yes, begin by completing Section B

If no, begin by completing Section D

Expenses should be listed in the appropriate date columns.

| Date | 02-27 | 02-28 | 03-01 | 03-02 | 03-03 | 03-04 |  | Total | EXTC |
|------|-------|-------|-------|-------|-------|-------|--|-------|------|
|------|-------|-------|-------|-------|-------|-------|--|-------|------|

## B. Meals For Self

List on the right the amount you paid for meals for yourself only. If you paid for meals that included others, list the amount(s) in Section E below.

|                   |       |       |       |       |       |       |  |        |  |
|-------------------|-------|-------|-------|-------|-------|-------|--|--------|--|
| Breakfast         |       | 10.00 | 11.00 |       | 10.00 | 11.00 |  |        |  |
| Lunch             | 10.00 | 15.00 |       |       | 15.00 |       |  |        |  |
| Dinner            |       | 23.00 | 21.00 | 23.00 |       |       |  |        |  |
| Total Meal Amount | 10.00 | 48.00 | 32.00 |       | 48.00 | 11.00 |  | 149.00 |  |

**C. Lodging** Did you pay for lodging? ☒ Yes ☐ No  
If no, I ☐ arranged for direct billing to Company.

☐ made personal arrangements.

If yes, enter lodging and related costs by the day on which they were paid. Please attach receipts for lodging.

|                      |        |        |        |        |        |        |  |         |  |
|----------------------|--------|--------|--------|--------|--------|--------|--|---------|--|
| Lodging              | 395.55 | 395.55 | 395.55 | 395.55 | 395.55 | 395.55 |  | 1977.75 |  |
| Porter/Tips          | 8.00   |        |        |        |        | 8.00   |  | 16.00   |  |
| Laundry/Dry Cleaning | 4.75   | .95    | 5.70   | 2.85   | 4.75   |        |  | 19.00   |  |
| Telephone Calls      |        |        |        |        |        |        |  |         |  |

## D. Transportation

1. Use the codes below to identify the primary mode of intercity travel.

AT = Air - billed to Company PC = Rental car  
AP = Air - paid by you (or charged to your credit card) PE = Personal car  
BT = Bus, train or ship WE = With other employee  
CC = Company car/Company plane PR = Personally arranged  
PH = Personally arranged

2. Enter amount you paid for intercity public transportation and attach receipts.

3. If you paid for a rental car, enter the amount and attach receipts.

4. If you used your personal car, enter by day the mileage, the rate per mile, and the amount to be reimbursed (unless a rate per mile).

5. Enter amounts you paid for parking at transportation terminal.

6. Enter amounts you paid for parking at destination city.

7. Enter amounts you paid for road tolls and ferry charges.

8. Enter amounts you paid for local taxi, bus or subway.

|                                    |        |       |       |       |       |       |  |        |  |
|------------------------------------|--------|-------|-------|-------|-------|-------|--|--------|--|
| 1. Mode of Travel                  | AP     |       |       |       |       |       |  |        |  |
| 2. Intercity Public Transportation | 295.00 |       |       |       |       |       |  | 295.00 |  |
| 3. Rental Car                      |        |       |       |       |       |       |  |        |  |
| 4. Personal Car Mileage            |        |       |       |       |       |       |  |        |  |
| Personal Car Rate                  |        |       |       |       |       |       |  |        |  |
| Personal Car Amount                |        |       |       |       |       |       |  |        |  |
| 5. Transportation Terminal Parking |        |       |       |       |       |       |  |        |  |
| 6. Destination City Parking        |        |       |       |       |       | 24.00 |  | 24.00  |  |
| 7. Road Tolls                      |        |       |       |       |       |       |  |        |  |
| 8. Local Transportation            | 25.00  | 18.00 | 16.00 | 18.00 | 14.00 | 17.00 |  | 108.00 |  |

## E. Conference And Business Meal Expense

In this section, list the costs you incurred in hosting conferences, business meals or refreshments for customers or fellow employees, or in attending business league meetings. Please explain the business purpose of each conference or business meal expense in Section G below.

|  |       |  |  |       |  |  |  |        |  |
|--|-------|--|--|-------|--|--|--|--------|--|
| Conference Expense Excluding Entertainment | 82.25 |  |  |       |  |  |  | 82.25  |  |
| Conference Entertainment Expenses          |       |  |  |       |  |  |  |        |  |
| Business Meals                             | 60.84 |  |  | 46.20 |  |  |  | 107.04 |  |
| Business League Meetings                   |       |  |  |       |  |  |  |        |  |

## F. Other Expenses

|  |  |  |  |  |  |  |  |  |  |
|--|--|--|--|--|--|--|--|--|--|
| Traveler's Checks                              |  |  |  |  |  |  |  |  |  |
| Gas - Rental Car                               |  |  |  |  |  |  |  |  |  |
| Porter/Tips (Other than with Lodging or Meals) |  |  |  |  |  |  |  |  |  |

2778.04

Sheet Total

## G. Explanation Of Conference And Business Meal Expenses.

Specify types of meals, dates, cities/states, restaurants or serving establishments, attendees names and titles, and the business purpose. If the business purpose is the same as that reported in Section A, it should not be repeated.

| Date  | Explanation  |
|-------|--|
| 02-27 | Refreshments for use in hospitality suite for business purposes while discussing NARUC issues.                       |
| 02-27 | Dinner for self at I Ricchi, Wash., DC, while attending NARUC winter meetings. (121.68 receipt; spouse's on front)   |
| 03-02 | Dinner for self at IronGate Inn, Wash., DC, while attending NARUC winter meetings (92.40 receipt; spouse's on front) |

## Employee Expense Voucher

To Sir

Sheet 1 of 1

| Yr. | Mo. | Serial | PT | Voucher Class |  | Stat | Draft # |  | Study 1 | Study 2 | Edited | Cert. |
|-----|-----|--------|----|---------------|--|------|---------|--|---------|---------|--------|-------|
|     |     |        |    |               |  |      |         |  |         |         |        |       |

**H. Certification** I hereby certify that items, amounts and explanations herein listed or attached are true and correct and are due from the Company.

Signature *[Signature]* Date 03 / 10 / 93

Title Assistant Vice Pres.-Reg. Rel. Exec.

Name (Print) **A. M. Lombardo**

Address ☐ Temp. ☐ New ☐ Company Mail

150 South Monroe Street, Suite 400

Tallahassee, FL 32301

|                                    |                  |
|------------------------------------|------------------|
| Social Security Number/Check Digit | Telephone Number |
| -                                  | (984) 222-0260   |

☒ Check here if your payroll RCO and GLC apply; otherwise, enter codes below:  
 Responsibility Code Originating (RCO)      Geographic Location Code (GLC)

### I. Approval

Total Amount Approved

►\$ 3,862.28

Signature \_\_\_\_\_ Date 03 / 11 / 93

Title **President-Florida**

Name (Print) **J. P. Lacher**

|            |         |
|------------|---------|
| Mgt. Level | Officer |
|------------|---------|

Social Security Number/Check Digit

| ↓ Advance And Credit Card Data | Number |
|--------------------------------|--------|
|--------------------------------|--------|

|                |                                    |                                     |               |
|----------------|------------------------------------|-------------------------------------|---------------|
| Cancel Advance | <input type="checkbox"/> Temporary | <input type="checkbox"/> Continuing | Amount<br>>\$ |
|----------------|------------------------------------|-------------------------------------|---------------|

If you used your Corporate Charge Card for any of these expenses, enter Amount Charged ▶▶

Date of earliest charge / /

### K. Special Handling Instructions

**Instructions** Report Management Travel Expenses on the reverse of this form. If all travel expense information is included on the reverse, leave Section L blank. Expenses not listed on the reverse must be listed in Section L below. Report Non-Management Travel Expenses in Section L. All Non-Travel Expenses, except Conference and Business Meal Expenses, must be reported in Section L. Shaded Areas are for Voucher Office Use Only.

**L. Explanation Of Expenses** Use this section to explain employee non-travel expenses or travel expenses not listed on the reverse of this form. For additional space, attach a Form RF-2391-S.

| Date        | EXTC | Amount  | Explanation   |
|-------------|------|---------|---|
|             |      |         | Travel expenses of spouse, Barbara Lombardo, while attending National Association of Regulatory Utility Commissioners meeting held in Washington, DC Feb. 27 - March 2. Spouse's attendance deemed appropriate for business purposes. |
| 02-27       |      | 295.00  | Airfare from Tallahassee to DC and return   |
| 02-27       |      | 8.50    | Meals--Lunch 8.50   |
| 02-27       |      | 60.84   | Business meal--Dinner at I Ricchi   |
| 02-28       |      | 47.60   | Meals--Bkfst 11.50; Lunch 13.10; Dinner 23.00   |
| 03-01       |      | 33.50   | Meals--Bkfst 11.00; Dinner 22.50  |
| 03-02       |      | 8.50    | Meals--Bkfst 8.50   |
| 03-02       |      | 46.20   | Business meal--Dinner at Irongate Inn   |
| 03-03       |      | 42.60   | Meals--Bkfst 10.00; Lunch 12.10; Dinner 20.50   |
| 03-04       |      | 8.00    | Meals--Bkfst 8.00   |
| 03-09       |      | 506.00  | Airfare for self to Atlanta and return to attend regulatory   |
| 03-09       |      | 6.50    | Parking at Tallahassee airport  |
| 03-09       |      | 21.00   | Dinner at Atlant airport while working meeting (92026Q)   |
| Sheet Total |      | 1084.24 | non-paid overtime.  |

**Sheet Total**

1084.24

Are these expenses to be charged to the certifier's RC, all JFC/EC(s), and any other codes as assigned for payroll purposes? ☐ Yes ☒ No  
If Yes, and no other information is required, leave Section M blank. Otherwise, complete Section M.

**11. Classification Data** (For additional classification lines, attach a Form RF-2391-S)

[illegible]

Delta airline receipt for TLHS/ATL/TLHS trip 3-9-93. Ticket purchased at airport--no itinerary provided.

**DELTA AIRLINES, INC.** SUBJECT TO CONDITIONS OF CONTRACT  
PASSENGER TICKET AND BAGGAGE CHECK

**PASSENGER RECEIPT**

FLIGHT  
CARRIER  
0725033238  
XXXXX  
YOUR CODE  
AIRLINE CODE  
800LL  
DATE OF ISSUE  
TLH FT0US03MAR93

NAME OF PASSENGER  
LOMBARDO/AM  
PRIVILEGE CODE  
GTV71T/DL 80L  
FARE BASIS/TICKET  
CLASS  
TIME  
STATUS  
NOT SOLD  
REFILED  
NOTED  
NOTHING AGENT IS  
DL/TH

**\*\*NOT VALID FOR\*\* THIS IS YOUR RECEIPT**  
**\*\*TRANSPORTATION\*\***

FI 09MAR TLH DL ATL 01.82 227.27806 DL TLH 227.27806  
USD456.36END XF TLH3

FARE  
USD 456.36  
US 45.64  
TAX 3.00  
XF 3.00  
USD506.00

COMM. FARE PD  
02825350754

STOCK CONTROL NO. TO 001

ALLOW FOR BY UNLESS  
DOCUMENT NUMBER  
0 006 2166872732 6

DO NOT MARK OR WRITE IN THE WHITE AREA ABOVE

VAT



AA11661554





For Reservations, call 404-529-6055  
For Emergency After Hour Service,  
call 1-800-777-7888  
(Your account ID is 11MO-Bell)

SALES PERSON: 43 ITINERARY/INVOICE NO. 0054437 DATE: 09 FEB  
CUSTOMER NBR: 011000 QKNEBX PAGE: 01

TO: LOMBARDO/A M SUITE 400  
150 S MONROE ST  
TALLAHASSEE FL 32301  
FEDEX 10FEB 904 222-0260\*VIP  
INCL WITH B LOMBARDO ATTN JUDY

FOR: LOMBARDO/A M REF: FF100000, NF:3

17 FEB 93 - SATURDAY

AIR USAIR <sup>714</sup> FLT: ~~1150~~ ECONOMY  
LV TALLAHASSEE ~~405P~~ 10:15A EGP: FOKKER 79  
AR CHARLOTTE ~~522P~~ 11:32A. NON-STOP  
LOMBARDO/A M SEAT-~~50~~ 864  
AIR USAIR FLT: ~~1150~~ ECONOMY SNACK  
LV CHARLOTTE ~~503P~~ 12:20P. EGP: 737-400  
AR WASHINGTON NATL ~~717P~~ 1:32P. NON-STOP  
CAR WASHINGTON NATL SEAT-~~150~~ NATIONAL CAR RENTAL 1-FULL SZ AUTO AC  
RETURN-04MAR  
RATE IS SUBJECT TO CHANGE  
DAILY-USD38.00 UNLIMITED MILEAGE  
CONFIRMATION NUMBER 0790778245A15E CORP ID-3140007  
HOTEL WASHINGTON NATL 5 NIGHTS OUT-04MAR  
IC THE WILLARD INTER CONTINEN 1 ROOM DOUBLE WITH BATH  
1401 PENNSYLVANIA AVE NW RATE-355.00C&V PER NIGHT  
WASHINGTON DC 20004 GUARANTEED LATE ARRIVAL  
PHONE 202-628-9100 CONFIRMATION 625211VERONICA

*Det tickets  
changed at  
counter*

*(gr. strict)*

04 MAR 93 - THURSDAY

AIR USAIR FLT:549 ECONOMY  
LV WASHINGTON NATL 905A EGP: 737-300  
AR CHARLOTTE 1027A NON-STDP  
LOMBARDO/A M SEAT-7C  
AIR USAIR FLT:1184 ECONOMY  
LV CHARLOTTE 1100A EGP: FOKKER 100  
AR TALLAHASSEE 1223P NON-STOP  
LOMBARDO/A M SEAT-3C

AIR TICKET US1322934355 *VA* LOMBARDO A M 295.00  
BILLED TO  
SUB TOTAL 295.00  
NET CC BILLING 295.00  
TOTAL AMOUNT DUE 0.00

*Bad  
Copy*



675 W. Peachtree St. Rm. G  
Atlanta, Georgia 30375

For Reservations, call 404-529-6055  
For Emergency After Hour Service,  
call 1-800-777-7999  
(Your account ID is 11HO-Bell)

SALES PERSON: 43 ITINERARY/INVOICE NO. 0054436  
CUSTOMER NBR: 011000 QLRZKH

DATE: 09 FEB 93  
PAGE: 01

TO: LOMBARDO BARBARA SUITE 400  
150 S MONROE ST  
TALLAHASSEE FL 32301  
FEDEX 10FEB 904 222-0260\*VIP\*  
INCL WITH A M LOMBARDO ATTN JUDY

FOR: LOMBARDO/BARBARA

REF: 99999999,99999999,NF,9

27 FEB 93 - SATURDAY

AIR USAIR 714  
LV TALLAHASSEE FLT: 1430 ECONOMY  
AR CHARLOTTE 405P 10:15A EQP: FOKKER F28  
LOMBARDO/BARBARA SEAT-5A 864 522P 11:32A NON-STOP  
AIR USAIR  
LV CHARLOTTE FLT: 1456 ECONOMY SNACK  
AR WASHINGTON NATL 605P 12:20P EQP: 737-400  
LOMBARDO/BARBARA SEAT-155 717P 1:32P NON-STOP

*Set tickets  
changed at  
counter.*

04 MAR 93 - THURSDAY

AIR USAIR FLT: 549 ECONOMY  
LV WASHINGTON NATL 905A EQP: 737-300  
AR CHARLOTTE 1027A NON-STOP  
LOMBARDO/BARBARA SEAT-7B  
AIR USAIR FLT: 1184 ECONOMY  
LV CHARLOTTE 1100A EQP: FOKKER 100  
AR TALLAHASSEE 1223P NON-STOP  
LOMBARDO/BARBARA SEAT-3A

AIR TICKET US1322934354 LOMBARDO-BARBARA  
BILLED TO

295.00

PASSENGER TICKET AND BAGGAGE CHECK  
SUBJECT TO CONDITIONS OF CONTRACT  
NOT TRANSFERABLE

99999999,99999999,NF,9

011000 0054436 A43 1.00  
\*\*\*\*\*X95X 1.00

PASSENGER RECEIPT

ISSUED BY USAIR  
NAME OF TRAVEL AGENT CARLSON TRAVEL  
NAME OF PASSENGER LOMBARDO/BARBARA  
TO FROM ATLANTA GA US 04 FEB 93 TLH  
\*\*NOT VALID FOR\*\* THIS IS YOUR RECEIPT  
\*\*TRANSPORTATION\*  
NON-REFUNDABLE/CHANGE SUBJECT TO FEE  
294/ 000025 /FCTLH US X/CLT  
01.82 US HAS131.82 US X/CLT US TLH131.82KE14NR 265  
.46 END XFTLH3

ARC

FLIGHT COUPON

TOUR CODE

AGENT CODE

NAME OF PASSENGER

LOMBARDO/BARBARA

PLACE OF ISSUE

TLH

TO

TLH

FROM

TLH

NOT VALID AFTER

TLH

NOT VALID BEFORE

TLH

NOT VALID

TLH

NOT VALID

TLH

NOT VALID

TLH

FARE USD 265.46  
TAX US 26.54  
XF 3.00  
TOTAL USD 295.00

STOCK CONTROL NO TX 8W CK  
42214834174

0 037 1322934354 1

NOT VALID FOR TRAVEL  
0 037 1322934354 1  
A11111554

Gracias por habernos elegido Kiitos kannista Nous vous remercions d'être venu chez nous  
 多謝光臨 Muito obrigado por nos ter dado a honrada sua preferencia شكرا لكم لاختياركم الافامه معنا  
 Tak for besøget 当ホテルをご利用いただきまして誠にありがとうございます Wij danken U voor Uw bezoek  
 Ευχαριστούμε που μας προτιμήσατε Wir danken Ihnen, daß Sie bei uns zu Gast waren  
 Terima kasih atas kesediaan anda menginap di hotel kami Thank you for staying with us

# THE WILLARD INTER-CONTINENTAL

1401 PENNSYLVANIA AVENUE, WASHINGTON D.C. 20004 TEL. (202) 628-9100

IN NORTH AMERICA  
 there are superb  
 Inter-Continental Hotels in:

CHICAGO  
 MAUI  
 MIAMI  
 MONTREAL  
 NEW ORLEANS  
 NEW YORK  
 SAN FRANCISCO  
 TORONTO

CHICAGO-FORUM  
 ... and in more than  
 80 cities worldwide.

RESERVATIONS:  
 800-327-0200  
 IN THE U.S.A.

LOMBARDO, A M M/M  
 CARLSON TRAVEL  
 150 SMCNROE  
 TALLAHASSEE, FL

|         |         |
|---------|---------|
| 2/27/93 | 2/27/93 |
| 3/04/93 | 3/04/93 |
| 2       | 2       |
| 355.00  | 355.00  |

\*\*\* FINAL \*\*\*

ACCOUNT NO.

523250

ROOM NO.

310

| #  | DATE    | DESCRIPTION   | AMOUNT |
|----|---------|---|--------|
| 1  | 2/27/93 | TELEPHONE LOCAL...../310/2270409007/1/4<br>17:29/3932000    | .95 1. |
| 2  | 2/27/93 | TELEPHONE LOCAL...../310/2270417002/1/4<br>17:38/3932000    | .95 2. |
| 3  | 2/27/93 | TELEPHONE LONG DIST./310/2270504001/1/4<br>18:29/3016542724 | .95 3. |
| 4  | 2/27/93 | TELEPHONE LONG DIST./310/2270507001/1/4<br>18:30/3016542724 | .95 4. |
| 5  | 2/27/93 | TELEPHONE LOCAL...../310/2270516004/1/4<br>18:31/3016542724 | .95 5. |
| 6  | 2/27/93 | ROOM CHARGE */310/2/2/4                                     | 355.00 |
| 7  | 2/27/93 | ROOM TAX 11% */310/2/2/4                                    | 39.05  |
| 8  | 2/27/93 | OCCUPANCY TAX (DC) */310/2/2/4<br>1 ROOM OCCUPANCY TAX      | 1.50   |
| 9  | 2/28/93 | TELEPHONE LOCAL...../310/2280878019/1/4<br>10:32/3016542724 | .95 6. |
| 10 | 2/28/93 | ROOM CHARGE */310/2/2/4                                     | 355.00 |
| 11 | 2/28/93 | ROOM TAX 11% */310/2/2/4                                    | 39.05  |

CONTINUE...

|   |         |  |  |        |       |          |
|---|---------|--|--|--------|-------|----------|
| OK'D<br>BY  | COMPANY |  |  | STREET |       |          |
| I AGREE THAT MY LIABILITY FOR THIS BILL IS NOT WAIVED AND AGREE<br>TO BE HELD PERSONALLY LIABLE IN THE EVENT THAT THE INDICATED<br>PERSON, COMPANY OR ASSOCIATION FAILS TO PAY FOR ANY PART OF<br>THE FULL AMOUNT OF THESE CHARGES. |         |  |  | CITY   | STATE | ZIP CODE |
| SIGNATURE   |         |  |  | X      |       |          |



Gracias por habernos elegido Kiitos kaynnista Nous vous remercions d'être venu chez nous  
 多謝光臨 Muito obrigado por nos ter dado a honra da sua preferencia شكرا لكم لاختياركم الاقامة  
 Tak for besøget 当ホテルをご利用いただきまして誠にありがとうございます Wij danken U voor Uw bezoek  
 Ευχαριστούμε που μας προτιμήσατε Wir danken Ihnen, daß Sie bei uns zu Gast waren  
 Terima kasih atas kesediaan anda menginap di hotel kami Thank you for staying with us

# THE WILLARD INTER-CONTINENTAL

1401 PENNSYLVANIA AVENUE, WASHINGTON D.C. 20004 TEL (202) 628-9100

LOMBARDO, A M M/M  
 CARLSON TRAVEL  
 150 SMONROE  
 TALLAHASSEE, FL

2/27/93  
 3/04/93  
 2  
 355.00

ACCOUNT NO.

523250

ROOM NO.

310

FINAL

IN NORTH AMERICA  
 there are superb  
 Inter-Continental Hotels in:

CHICAGO  
 MAUI  
 MIAMI  
 MONTREAL  
 NEW ORLEANS  
 NEW YORK  
 SAN FRANCISCO  
 TORONTO  
 CHICAGO-FORUM

... and in more than  
 80 cities worldwide.

RESERVATIONS:  
 800-327-0200  
 IN THE U.S.A.

| #  | DATE    | DESCRIPTION   | AMOUNT  |
|----|---------|---|---------|
| 22 | 3/02/93 | TELEPHONE LONG DIST./310/3020896002/1/4<br>15:10/9045614482 | .95 13. |
| 23 | 3/02/93 | TELEPHONE LOCAL...../310/3021446001/1/4<br>17:31/7371370    | .95 14. |
| 24 | 3/02/93 | TELEPHONE LOCAL...../310/3021934034/1/4<br>21:21/3019776985 | .95 15. |
| 25 | 3/02/93 | ROOM CHARGE */310/2/2/4                                     | 355.00  |
| 26 | 3/02/93 | ROOM TAX 11% */310/2/2/4                                    | 39.05   |
| 27 | 3/02/93 | OCCUPANCY TAX (DC) */310/2/2/4<br>1 ROOM OCCUPANCY TAX      | 1.50    |
| 28 | 3/03/93 | TELEPHONE LONG DIST./310/3030071013/1/4<br>09:07/904        | .95 16. |
| 29 | 3/03/93 | TELEPHONE LOCAL...../310/3030154010/1/4<br>09:20/3019776985 | .95 17. |
| 30 | 3/03/93 | TELEPHONE LONG DIST./310/3030203002/1/4<br>09:51/9045614482 | .95 18. |
| 31 | 3/03/93 | TELEPHONE LONG DIST./310/3031261001/1/4<br>16:44/9045614482 | .95 19. |

CONTINUE...

|  |         |  |  |             |       |          |
|--|---------|--|--|-------------|-------|----------|
| OKT<br>BY  | COMPANY |  |  | STREET      |       |          |
| I AGREE THAT MY LIABILITY FOR THIS BILL IS NOT WAIVED AND AGREE TO BE HELD PERSONALLY LIABLE IN THE EVENT THAT THE INDICATED PERSON, COMPANY OR ASSOCIATION FAILS TO PAY FOR ANY PART OR THE FULL AMOUNT OF THESE CHARGES. |         |  |  | CITY        | STATE | ZIP CODE |
|  |         |  |  | SIGNATURE X |       |          |



Gracias por habernos elegido Kiitos kaynnista Nous vous remercions d'être venu chez nous  
 多謝光臨 Muito obrigado por nos ter dado a honra da sua preferencia شكرا لكم لاختياركم الالف معانا  
 Tak for besøget 当ホテルをご利用いただきまして誠にありがとうございます Wij danken U voor Uw bezoek  
 Ευχαριστούμε που μας προτιμήσατε Wir danken Ihnen, daß Sie bei uns zu Gast waren  
 Terima kasih atas kesediaan anda menginap di hotel kami Thank you for staying with us

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| DATE | 355.00        |
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|----|---------|---|--------|
| 12 | 2/28/93 | OCCUPANCY TAX (DC) */310/2/2/4<br>1 ROOM OCCUPANCY TAX      | 1.50   |
| 13 | 3/01/93 | TELEPHONE LONG DIST./310/3010109001/1/4<br>09:04/3055305555 | .95 1. |
| 14 | 3/01/93 | TELEPHONE LONG DIST./310/3010114002/1/4<br>09:05/9045614482 | .95 1. |
| 15 | 3/01/93 | TELEPHONE LONG DIST./310/3010115001/1/4<br>09:06/9045614482 | .95 1. |
| 16 | 3/01/93 | TELEPHONE LONG DIST./310/3010662001/1/4<br>13:36/9045614482 | .95 1. |
| 17 | 3/01/93 | TELEPHONE LONG DIST./310/3011198002/1/4<br>16:54/9045614482 | .95 1. |
| 18 | 3/01/93 | TELEPHONE LOCAL...../310/3011219001/1/4<br>16:59/3932000    | .95 1. |
| 19 | 3/01/93 | ROOM CHARGE */310/2/2/4                                     | 355.00 |
| 20 | 3/01/93 | ROOM TAX 11% */310/2/2/4                                    | 39.05  |
| 21 | 3/01/93 | OCCUPANCY TAX (DC) */310/2/2/4<br>1 ROOM OCCUPANCY TAX      | 1.50   |

CONTINUE...

|   |         |  |  |        |       |          |
|---|---------|--|--|--------|-------|----------|
| OK'D<br>BY  | COMPANY |  |  | STREET |       |          |
| I AGREE THAT MY LIABILITY FOR THIS BILL IS NOT WAIVED AND AGREE<br>TO BE HELD PERSONALLY LIABLE IN THE EVENT THAT THE INDICATED<br>PERSON, COMPANY OR ASSOCIATION FAILS TO PAY FOR ANY PART OR<br>THE FULL AMOUNT OF THESE CHARGES. |         |  |  | CITY   | STATE | ZIP CODE |
| SIGNATURE   |         |  |  | X      |       |          |

Gracias por habernos elegido. Kiitos kaynnista. Nous vous remercions d'être venu chez nous.  
 多謝光臨。Muito obrigado por nos ter dado a honrada sua preferencia. شكرا لكم لاجراءكم الافادة.  
 This is our hope 当ホテルをご利用いただきまして誠にありがとうございます。Wij danken u voor uw bezoek.  
 这是我们的心愿。Nous espérons que vous serez satisfait de votre séjour. Wir danken Ihnen, daß Sie bei uns zu Gast waren.  
 这是我们的心愿。Kami berharap anda senang menginap di hotel kami. Thank you for staying with us.

# THE WILLARD INTER-CONTINENTAL

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|-----------------------------|---------|---|---------|
| 32                          | 3/03/93 | TELEPHONE LONG DIST./310/3031943004/1/4<br>23108/9046689164 | 2.95    |
| 33                          | 3/03/93 | ROOM CHARGE */310/2/2/4                                     | 355.00  |
| 34                          | 3/03/93 | ROOM TAX 11% */310/2/2/4                                    | 39.05   |
| 35                          | 3/03/93 | OCCUPANCY TAX (DC) */310/2/2/4<br>1 ROOM OCCUPANCY TAX      | 1.50    |
| C/O CLERK-RLA<br>TIME- 7:13 |         |   |         |
| * BALANCE DUE *             |         |   | 1996.75 |
| CONFIRMATION # 625211       |         |   |         |

3/3  
 room  
 395.55

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Cardmember ALAN...  
 12/92 THPU 11/95 71  
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 005202401-00 HT: 022793  
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 2080180349 DC  
 PLEASE WRITE FIRMLY  
 Cardmember Signature  
 Merchandise sold or service purchased on this card shall not be resold or re-  
 turned for cash refund. Establishment agrees to transmit to American Express  
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**ATTACHMENT 5**



**FOR IMMEDIATE RELEASE**

**June 28, 1993**

**FOR MORE INFORMATION**

**Rev DeMello (904) 488-0733**

(Tallahassee, FL.) PSC Commissioner Tom Beard announced today that he has married Alma Paruolo, an employee of Southern Bell. Beard said that as a result of his marriage, he has voluntarily made a decision to permanently recuse himself from any further matters filed on behalf of his wife's employer.

"Even though the law gives no clear direction, I believe this is the most appropriate decision," said Beard. "It is my hope that this action will finally bring to an end the intense scrutiny under which my family and I have been placed over the many months of these investigations."

Beard reemphasized that all investigations completed to date have failed to uncover any evidence of wrongdoing and said that he is confident a pending report from the Florida Department of Law Enforcement will reach the same conclusion.

"There are major issues before the commission that are critical to the citizens of this state. That is where our attention should be focused, not on personal attacks and witch hunts based on unsubstantiated allegations," said Beard.

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