

**In The Matter Of:**

*Michael Barfield v.*

*James Satcher, Vanessa Baugh, and Kevin Van Ostenbridge*

---

*Vanessa Baugh*

*May 14, 2021*

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IN THE CIRCUIT COURT OF THE TWELFTH JUDICIAL CIRCUIT  
IN AND FOR MANATEE COUNTY, FLORIDA

CASE NO.: 2020-CA-4699

MICHAEL BARFIELD,

Plaintiff,

-vs-

VANESSA BAUGH,

Defendant.

-----/

DEPOSITION OF

VANESSA BAUGH

Taken on Behalf of the Plaintiff

DATE TAKEN:           Friday, May 14, 2022

TIME:                   Commencing at 9:54 a.m.

PLACE:                 Imperial Court Reporting  
1904 Manatee Avenue West  
Suite 200  
Bradenton, Florida 342005

Examination of the witness taken before:

Melissa England, CSR  
Imperial Court Reporting  
1904 Manatee Avenue West, Suite 200  
Bradenton, Florida 34205

Imperial Court Reporting (941) 260-9000

APPEARANCES FOR THE PLAINTIFF

MICHAEL BARFIELD, PRO SE

APPEARANCES FOR THE DEFENDANT

GEORGE LEVESQUE, ESQ.  
 Gray Robinson, P.A.  
 301 S. Bronough Street, Suite 600  
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 george.levesque@gray-robinson.com

ALSO PRESENT

Chrisann Allen

\* \* \*

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(Exhibits retained by Mr. Barfield.)

1 THEREUPON,

2 VANESSA BAUGH

3 was adduced as the witness herein, and being first duly  
4 sworn upon oath, was questioned and testified as follows:

5 THE WITNESS: I do.

6 DIRECT EXAMINATION

7 BY MR. BARFIELD

8 Q. Good morning. Can you state your full name for  
9 the record.

10 A. Vanessa Ann Baugh.

11 Q. Have you ever had your deposition taken before?

12 A. No.

13 Q. Okay. If there's any questions that I ask that  
14 you don't understand, please stop me and ask for  
15 clarification or to repeat the question. Okay?

16 A. Okay.

17 Q. And try not to talk over each other because she  
18 has to take it down fairly quickly.

19 How long have you served as a commissioner?

20 A. Started my ninth year. Be nine years in  
21 November.

22 Q. So 2012?

23 A. 2012, yes.

24 Q. Okay. What did you do to prepare for today's  
25 deposition?

1 A. I talked to my attorneys.

2 Q. Anything else? I'm not interested in  
3 conversations you had with them, but did you review any  
4 documents?

5 A. Oh, of course, of course.

6 Q. What did you review?

7 A. I went over the complaint that you filed. And  
8 really, to be honest, that's about it.

9 Q. Okay. Did you go over the verified amended  
10 response that you filed?

11 A. Yes.

12 Q. Are you familiar with the three record requests  
13 that are the subject of this case?

14 A. Yes.

15 Q. Between the period of October 1, 2020 and  
16 November 25, 2020, did you send or receive public records  
17 via any personal electronic device?

18 A. I'm sorry, what were the days?

19 Q. October 1, 2020, November 25.

20 A. I don't recall.

21 Q. Can you identify each electronic device that  
22 you used during that period of time, personal electronic  
23 device?

24 A. A cell phone.

25 Q. And is it a county-issued cell phone or

1 personal?

2 A. Personal.

3 Q. Any other devices?

4 A. There's two cell phones, both of which are  
5 mine. One that I primarily use for county.

6 Q. Two cell phones. What are the numbers?

7 A. (941) 780-6467. And the other one, I don't  
8 recall the whole number. I can tell you it starts with  
9 (941) 518. I don't recall the last four digits.

10 Q. And you use one of them primarily for county  
11 business?

12 A. Correct.

13 Q. Which one?

14 A. The 518.

15 Q. The 518. Okay. Any other electronic devices  
16 that you use?

17 A. I have a county iPad and a county laptop.

18 Q. Any personal computer at home, laptop?

19 A. I have a laptop at home, yes.

20 Q. And did you use that during that time period to  
21 conduct official business?

22 A. I don't recall, but it would be unusual for me  
23 to do so.

24 Q. And what type of cell phone do you have? Is it  
25 an Android or an iPhone?

1 A. iPhone.

2 Q. Okay. Do you have social media accounts too  
3 during that period of time or did you have during that  
4 period of time?

5 A. Yes.

6 Q. Facebook?

7 A. Yes.

8 Q. Parler?

9 A. No.

10 Q. You --

11 A. I'm sorry, let me back up. From what was the  
12 time?

13 Q. October 1, 2020 through November 25, 2020.

14 A. Probably did have Parler some time in that  
15 area. I don't remember the exact dates.

16 Q. Do you have any other app or program that you  
17 use to send or receive records? Digital --

18 A. Don't understand your question.

19 Q. Did you have any other program app -- do you  
20 know what an app is?

21 A. Of course.

22 Q. Did you have any program or app that you use to  
23 communicate, send, receive information?

24 A. You mean like Twitter? Is that what you're  
25 referring to?

1 Q. Twitter is an app, yes.

2 A. Okay. I do have Twitter. I'm sure that you're  
3 aware of that. Instagram.

4 Q. Instagram.

5 A. And that's it.

6 Q. Do you use Dropbox?

7 A. No.

8 Q. Have you ever heard of Signal?

9 A. Yes, I've heard of it.

10 Q. Have you ever used it?

11 A. Really, no. No, I don't even have it.

12 Q. You don't have an account?

13 A. I do not have an account with Signal.

14 Q. And does anyone else have access to these  
15 personal cell phones of yours other than you?

16 A. Yes.

17 Q. Who?

18 A. My husband.

19 Q. Anyone else?

20 A. IT at the county, sure.

21 Q. Your personal cell phones?

22 A. Sure, if need be.

23 Q. If need be?

24 A. Yes.

25 Q. Okay. And do you also use Messenger, Facebook



1 Messenger?

2 A. On occasion.

3 Q. Slack?

4 A. No.

5 Q. Google Chat?

6 A. No.

7 Q. Teams?

8 A. No, never heard of them.

9 Q. Zoom?

10 A. Zoom? No.

11 Q. Okay. So between the period of time of  
12 October 1 and November 25 -- we are going to keep using  
13 those dates until I tell you otherwise.

14 A. Okay.

15 Q. Were you the records custodian for your  
16 personal cell phones?

17 MR. LEVESQUE: Object to form.

18 You can answer.

19 THE WITNESS: Yes.

20 BY MR. BARFIELD

21 Q. And your laptop?

22 MR. LEVESQUE: Same objection.

23 BY MR. BARFIELD

24 Q. Your personal laptop?

25 A. Yes.

1 Q. Other than your husband, no one else had access  
2 to them; is that correct?

3 A. Correct.

4 Q. Okay. Did you perform backups on those  
5 devices?

6 A. No.

7 Q. Do you know what a backup is?

8 A. I've heard of it.

9 Q. And you did not have any method of archiving  
10 your records on your personal devices during that time  
11 period?

12 A. No.

13 Q. Now, at the time of the three record requests  
14 that are the subject of this case, the county did not  
15 have physical possession of your text messages on your  
16 personal devices, did they?

17 MR. LEVESQUE: Object to form.

18 You can answer.

19 THE WITNESS: I don't recall because at the  
20 time I had public information requests that I was  
21 getting together. So they could have had some of  
22 those at that time. I don't remember the exact  
23 dates.

24 BY MR. BARFIELD

25 Q. Did they have access to the device itself at

1 that time?

2 A. I will tell you that, yes, the county did to a  
3 certain extent, yes.

4 Q. What extent was that?

5 A. I would go and meet with the person that  
6 handles the public information request for the county.  
7 And on occasion we would sit down side by side and I  
8 would give them my phone to look to see if something was  
9 a public record or not.

10 Q. Did that happen at any time during that  
11 October 1 to November 25 window?

12 A. I don't recall the dates, I'm sorry.

13 Q. Did they also have access to your Parler  
14 account?

15 A. They would have, yes.

16 Q. How would they have?

17 A. Well, because it was on the phone that she was  
18 holding so they might have.

19 Q. Who was holding?

20 A. The woman that handles the public information  
21 request for the county.

22 Q. Who is that?

23 A. Debbie Scaccianoce.

24 Q. And you don't know if it was in that time  
25 period or window that we discussed?

1 A. I'm sorry, I don't recall.

2 Q. Okay. The only way she would have been able to  
3 get your text messages and Parler account or Facebook was  
4 during that time when you physically brought your phone  
5 into the office, correct?

6 A. Yes.

7 MR. LEVESQUE: Object to form.

8 THE WITNESS: Sorry.

9 BY MR. BARFIELD

10 Q. Is that yes?

11 A. Yes.

12 Q. Okay. Now, the county wasn't backing up your  
13 text messages on your personal phone, were they?

14 A. No.

15 Q. They weren't backing up your social media  
16 accounts either, were they?

17 A. No.

18 Q. Or your e-mails?

19 A. No.

20 Q. And the records that were public business on  
21 those devices were in your individual possession,  
22 custody, and control, correct, with the exception of the  
23 time that you mentioned about Ms. Scaccianoce?

24 A. Yes.

25 Q. Are you familiar with the requirements of the

1 custodian under chapter 119 and chapter 257?

2 A. Yes.

3 MR. LEVESQUE: Object to form.

4 BY MR. BARFIELD

5 Q. And are you familiar with the term records  
6 management liaison officer?

7 MR. LEVESQUE: Object to form.

8 THE WITNESS: No.

9 BY MR. BARFIELD

10 Q. Did you ever file any documents with the  
11 department of state or any other state agency certifying  
12 that you were the records custodian for records on your  
13 personal devices?

14 MR. LEVESQUE: Object to form.

15 THE WITNESS: No.

16 BY MR. BARFIELD

17 Q. Did you have an electronic records keeping  
18 policy for the items on your personal devices?

19 MR. LEVESQUE: Object to form.

20 THE WITNESS: No.

21 BY MR. BARFIELD

22 Q. Was the issue of the county -- then-county  
23 administrator's, Cheri Coryea, evaluation in the latter  
24 part of 2020 one that involved official county business?

25 MR. LEVESQUE: Object to form.

1                   You can answer.

2                   THE WITNESS: Yes, yes.

3 BY MR. BARFIELD

4           Q.     And do you remember when that evaluation  
5 occurred?

6           A.     Not the day.

7           Q.     Frame of reference, the election, was it before  
8 or after?

9           A.     I don't recall.

10          Q.     Was it before or after the new commissioners  
11 came on some time in mid November?

12          A.     Before.

13          Q.     It was before. And it was shortly before, is  
14 that your recollection?

15                   MR. LEVESQUE: Object to the form.

16                   THE WITNESS: I don't recall.

17 BY MR. BARFIELD

18          Q.     What about the -- did you attend an event at  
19 Mote Marine in the latter part of 2020?

20          A.     Yes.

21                   MR. LEVESQUE: Just --

22                   THE WITNESS: Sorry.

23                   MR. LEVESQUE: You're starting to go into, you  
24 know, some areas where it's not clear to me why --  
25 they're designed to assess whether records exist or

1 not. I'm giving you leeway and I'm not telling you  
2 I'm going to start instructing her not to answer,  
3 but I just wanted to know, we would like to keep  
4 this a little more --

5 MR. BARFIELD: It will become apparent.

6 MR. LEVESQUE: Thank you.

7 BY MR. BARFIELD

8 Q. And that was an official Manatee County event  
9 as well?

10 A. No.

11 Q. Well, did Manatee County have any participation  
12 in the agreement with Mote Marine?

13 A. I have a problem with your question because  
14 there were a couple of events. And so I'm not sure which  
15 one you're referring to.

16 Q. I believe there was a ground breaking ceremony.

17 A. Yes.

18 Q. So that was -- you were there in your official  
19 capacity --

20 A. Yes, I was.

21 Q. -- correct? And you attended that event,  
22 correct, and gave remarks?

23 A. Yes.

24 Q. And it was on your official Manatee County  
25 calendar, correct?

1 MR. LEVESQUE: Object to form.

2 MR. BARFIELD: Withdrawn.

3 BY MR. BARFIELD

4 Q. Now, did you understand that the three records  
5 requests as seeking records in your individual  
6 possession?

7 A. Yes.

8 Q. Okay. In fact, that was in the first paragraph  
9 of the request, correct?

10 A. I don't recall.

11 MR. BARFIELD: Let me show you what I'm going  
12 to mark as Exhibit 1.

13 (Plaintiff's Exhibit No. 1 was marked for  
14 identification.)

15 BY MR. BARFIELD

16 Q. Here's a copy for your attorney and I marked  
17 the one that I'm giving you. And if you could, refer to  
18 Exhibit 5. And I can help you, if you'd like, to find  
19 it. You see the first paragraph there on Exhibit 5 to  
20 what is marked Exhibit 1, the last sentence that says --  
21 can you state what that last sentence is, please?

22 A. This request is for the public records in the  
23 individual possession of Vanessa Baugh.

24 Q. And in the individual possession of Vanessa  
25 Baugh is bolded, isn't it?



1 A. Yes.

2 Q. So you understood that was seeking records in  
3 your individual possession?

4 A. Yes.

5 Q. Okay. Now, prior to November 2020, had you  
6 received direction or guidance about compliance with the  
7 Public Records Act when it came to records created, sent,  
8 or received on your personal devices or accounts?

9 A. Yes.

10 Q. From who?

11 A. The county attorney's office every year, four  
12 hours.

13 Q. You attended training seminars on public  
14 records and sunshine law compliance?

15 A. Yes.

16 Q. And during those training sessions, what were  
17 you told about -- what was the direction or guidance you  
18 received about communicating back and forth on personal  
19 devices?

20 A. That if it pertains to county business, then it  
21 has to be retained.

22 Q. Any other guidance or direction that they gave  
23 you in that training?

24 A. That's pretty much what I recall.

25 Q. And who was it that gave that training?

1 A. The county attorney.

2 Q. Mickey Palmer at the time?

3 A. Yes, and other attorneys in his firm.

4 Q. And every year you received that training since  
5 2012?

6 A. Yes.

7 Q. And every year it was the same advice, nothing  
8 changed about that guidance?

9 A. Correct.

10 Q. And do you also recall commission meetings,  
11 public commission meetings where Mickey Palmer,  
12 then-county attorney, reiterated that advice?

13 A. I don't recall that, in all fairness.

14 Q. Do you recall the Robin DiSabatino fee  
15 reimbursement issue that came up in 2016?

16 A. Yes.

17 Q. And do you recall that the issue in that case  
18 was about personal -- official business records on  
19 then-Commissioner DiSabatino's personal devices?

20 A. No, because I was not involved.

21 Q. But you attended that meeting and voted on that  
22 matter, did you not?

23 MR. LEVESQUE: Object to the form.

24 THE WITNESS: I don't believe there was a vote.

25 MR. LEVESQUE: Is this related to records in

1 this case?

2 MR. BARFIELD: Yes.

3 MR. LEVESQUE: Okay. The only reason I ask is  
4 you're asking her about whether she attended a  
5 meeting and whether she voted on something. And I  
6 don't get the nexus to how the records are related  
7 to this case.

8 MR. BARFIELD: I'll try to tie it in.

9 MR. LEVESQUE: Okay.

10 BY MR. BARFIELD

11 Q. Were you the chair in 2016 for the Manatee  
12 County Commission?

13 A. Yes.

14 Q. So you would have attended all meetings,  
15 correct?

16 A. Most.

17 Q. And do you recall that I think -- I can't  
18 remember what you said. I think you said that you recall  
19 being at that meeting when Commissioner DiSabatino's  
20 reimbursement came up?

21 A. Yes.

22 Q. And do you recall Mickey Palmer sitting next to  
23 you at that meeting?

24 A. No.

25 Q. Where would the county attorney sit in

1 proximity to the chair?

2 A. Down at the end on the other end of the dais.

3 Q. Do you recall Mickey Palmer giving statements  
4 at that meeting reiterating the direction and advice from  
5 his office about communicating on private devices?

6 A. No.

7 Q. At any time have you heard Mickey Palmer tell  
8 you and other commissioners that if you communicate on  
9 private devices, to forward it to the clerk or your  
10 official e-mail address?

11 A. I recall that he said that would be the best  
12 thing to do, yes.

13 Q. That was his guidance and advice, correct?

14 MR. LEVESQUE: Object to the form.

15 THE WITNESS: Again, he said that would be the  
16 best thing to try to do.

17 BY MR. BARFIELD

18 Q. Okay. And did he give you some other option of  
19 what you should do?

20 A. Make sure you keep it.

21 Q. Back it up, archive it?

22 A. No.

23 Q. Did he tell you that you become the individual  
24 records custodian if you do not forward it to the county?

25 MR. LEVESQUE: Object to the form.

1 THE WITNESS: I don't recall that.

2 BY MR. BARFIELD

3 Q. Since you became a commissioner, what was the  
4 practice that you observed in terms of forwarding or  
5 retaining e-mails, text messages about public business on  
6 your personal devices to the county?

7 MR. LEVESQUE: Object to the form.

8 You can answer if you understand the question.

9 THE WITNESS: I would forward some. I would do  
10 it periodically to try to get it done, if that's  
11 what you're asking.

12 BY MR. BARFIELD

13 Q. Periodically, how often?

14 A. No particular routine. When I had time, I  
15 would sit down and try and catch up if I needed to.

16 Q. Sometimes you get behind, I would imagine?

17 A. It's a busy job.

18 Q. How would you make the determination when you  
19 would forward to the county and when you didn't?

20 A. I always made sure that if it was anything  
21 pertaining to county business, I knew I had to keep it.  
22 So if I saw something, when I sit down to do that, I  
23 would forward it. I had a particular folder at the  
24 county. It said text messages.

25 Q. Did any of the direction and guidance from the

1 county attorney's office include -- strike that.

2 Any direction or guidance from the county  
3 attorney's office about communications on your personal  
4 device and the steps that you should take to preserve and  
5 ensure that they're properly captured and archived in the  
6 county records?

7 MR. LEVESQUE: Object to the form to the extent  
8 that it relies on verbal communications that were  
9 not in the public forum. Those are protected by  
10 attorney-client privilege. Otherwise, if it's  
11 written or in the public forum, you can answer the  
12 question.

13 THE WITNESS: I hate to do this, but I'm going  
14 to have to ask you to repeat the question.

15 BY MR. BARFIELD

16 Q. Did any direction or guidance from the county  
17 attorney's office about communications on your personal  
18 devices include the steps that you should take to  
19 preserve those records and ensure that they are properly  
20 captured and archived in the county system?

21 MR. LEVESQUE: Same objection.

22 THE WITNESS: I don't recall.

23 BY MR. BARFIELD

24 Q. You don't recall whether that happened in a  
25 public meeting or in a private meeting?

1           A.    He might have gone over that in the four  
2 hours --

3                   MR. LEVESQUE:   Same objection.

4                   THE WITNESS:   -- frame, but --

5                   MR. LEVESQUE:   Sorry.

6                   THE WITNESS:   Sorry.  I don't recall exactly,  
7                   no.

8 BY MR. BARFIELD

9           Q.    Did anyone explain the reasons for that  
10 guidance?

11                   MR. LEVESQUE:   Same objection.

12                   THE WITNESS:   I can't answer that question.  I  
13                   don't know.

14 BY MR. BARFIELD

15           Q.    Did you ever ask?

16                   MR. LEVESQUE:   Object to the form.  And object  
17                   -- same objection regarding attorney-client  
18                   communications.

19                   THE WITNESS:   Yeah.

20                   MR. BARFIELD:   You can have a standing  
21                   objection to any attorney-client communications.  I  
22                   do not agree that there is a privilege between her  
23                   individually and any county attorney under a Supreme  
24                   Court decision unless it's in a shade meeting, but  
25                   we'll get to that at another point.

1           MR. LEVESQUE: Sure. And I've got to assert an  
2           objection, otherwise I waive it, because I'm aware  
3           of Supreme Court precedent that says if I don't, I  
4           waive it. So I'll try to keep them brief.

5           MR. BARFIELD: Yes.

6 BY MR. BARFIELD

7           Q. Okay. Was one of the reasons for the guidance  
8           that was given by the county attorney is that by  
9           forwarding it to the county, it gives the county the  
10          ability to respond to records requests when they come in?

11          A. I can't tell you that it was for that  
12          particular only purpose. It was because I thought that's  
13          where it would be protected the most.

14          Q. So they would be backing it up in the county  
15          system, you wouldn't have to worry about losing your  
16          phone?

17          A. Right.

18          Q. Deleting anything by accident?

19          A. I wouldn't say it exactly that way, but okay.

20          Q. Preservation. Let's just agree it could be  
21          properly archived and backed up. Do you agree with that?

22          A. Yes.

23          Q. Okay. And that it would give the county the  
24          ability to quickly respond to records requests instead of  
25          having to come and bother you with your busyness,



1 correct?

2 A. I never looked at it that way.

3 Q. I'm asking you to look at it that way now.

4 A. What's your question then?

5 Q. Does that make sense to you that that's a  
6 reason behind the guidance?

7 A. Yes.

8 Q. Just to be clear, you've been told on multiple  
9 occasions, including the annual training, that when an  
10 elected official or even an appointed official utilizes a  
11 personal device to communicate about government business,  
12 send or receive, that person becomes a custodian of  
13 records, correct?

14 MR. LEVESQUE: Object to the form.

15 You can answer if you understand the question.

16 THE WITNESS: Yes.

17 BY MR. BARFIELD

18 Q. Now, you mentioned from time to time you  
19 forward information to your official Manatee County  
20 e-mail account, correct?

21 A. Yes.

22 Q. Text messages?

23 A. Yes.

24 Q. E-mails?

25 A. Yes.

1 Q. Parler messages?

2 MR. LEVESQUE: Object to the form.

3 THE WITNESS: There was never any county  
4 business on Parler.

5 BY MR. BARFIELD

6 Q. We'll get to that. But you didn't forward any  
7 from Parler, correct?

8 A. No.

9 Q. Or Facebook?

10 A. I can't say that's true, no.

11 Q. Did you ever forward anything to the county  
12 from your Facebook page?

13 A. On occasion, yes.

14 Q. On what occasions?

15 A. I don't recall.

16 Q. In 2020 did you do it?

17 A. I don't recall.

18 Q. Did you do it in response to any of the three  
19 requests in this case?

20 A. I honestly don't recall.

21 Q. Well, when you received that first records  
22 request that was Exhibit 5 that's in front of you to your  
23 left there, what did you do to start identifying all  
24 records responsive to that request?

25 A. I think the first thing I did as I recall is I

1 called Debbie Scaccianoce and asked her what she needed  
2 me to do.

3 Q. When did you call Ms. Scaccianoce?

4 A. I don't remember the date.

5 Q. Was it the same day you got the request?

6 A. I don't recall.

7 Q. Some time shortly after?

8 A. Yes.

9 Q. And did you -- what happened? What did she  
10 tell you, if anything?

11 A. To look on my phone, any text messages, e-mails  
12 that I had pertaining to county business to forward to  
13 her. And that she was going to take care of anything  
14 that was on the county computer and telephone log from my  
15 county phone.

16 Q. Why would she be looking on your county  
17 e-mails; do you know?

18 MR. LEVESQUE: Object to the form.

19 THE WITNESS: Because she wanted to make sure  
20 she was thorough. I will tell you there was great  
21 due diligence done in trying. I did the best to my  
22 ability to meet your request. And by the way, it  
23 always, always went through the county and to my  
24 attorneys as well.

25 BY MR. BARFIELD

1 Q. So when you began producing records in response  
2 to the request, you forwarded it to the county --

3 A. Yes.

4 Q. -- at some point in time? Now, you filed a  
5 verified amended motion in this case. Do you -- under  
6 oath. Do you recall the dates you began forwarding those  
7 e-mails and text messages?

8 A. I do not. Off the top of my head, no.

9 Q. Okay. We'll come back to that.

10 A. Giving me way too much credit.

11 Q. Did anyone assist you, other than your  
12 attorney, in searching for and identifying responsive  
13 records to the request?

14 MR. LEVESQUE: Object to the form.

15 To the extent you can answer it without  
16 disclosing attorney-client privilege, you can  
17 answer.

18 THE WITNESS: Actually, there -- I would go to  
19 Debbie's office, Debbie Scaccianocie's office and go  
20 over things with her to make sure that we were  
21 abiding by your request. And also talked to my  
22 attorney and to the county attorney as well.

23 BY MR. BARFIELD

24 Q. Did Ms. Scaccianoce have complete access to  
25 your phone?

1           A.     I don't know what you mean by that question.  I  
2 want to make sure I answer it properly.

3           Q.     Did you leave the phone in her custody?

4           A.     No.

5           Q.     You were with her at all times when she had  
6 your phone or was maybe looking at it?

7           A.     Yes.

8           Q.     Did she actually take your phone and go through  
9 and --

10          A.     Yes.

11          Q.     -- look for things?

12          A.     She had my phone in her hand scrolling, yes.

13          Q.     And how long did that process occur?

14          A.     Is your question -- maybe you better ask -- I  
15 want to make sure I understand your question.  I want to  
16 be very clear with my answer.  So help me with that.

17          Q.     How many times did you do this with  
18 Ms. Scaccianoce?

19          A.     Two or three times.  I don't recall exactly,  
20 but two or three times.

21          Q.     In response to these requests that we are here  
22 about today?

23          A.     Any of your requests.

24          Q.     Okay.  The three that we are here about today,  
25 those are the only three that we are talking about.

1 A. Okay.

2 Q. How many times did you meet with  
3 Ms. Scaccianoce?

4 A. Oh, gosh. I did not keep the dates of when I  
5 would go to her office, but I can tell you several times  
6 I went to her office.

7 Q. And do you remember how long those meetings  
8 occurred?

9 A. With her in her office? I did not time them.  
10 I apologize. And they were different amounts of time,  
11 you know.

12 Q. Can you give me a ballpark?

13 A. 30 minutes to an hour probably. I don't recall  
14 exactly.

15 Q. Did she go through each individual text  
16 message?

17 MR. LEVESQUE: Object to the form.

18 THE WITNESS: I can't answer that because some  
19 I sent to her already. And I know that -- I'm sure  
20 she looked at every one of them to make sure it was  
21 county related, if that's what you're asking me.

22 BY MR. BARFIELD

23 Q. So you don't know if she went through each  
24 message?

25 A. I will tell you that, as I said before, there

1 was great due diligence done by the county, by me, by my  
2 attorneys to make sure that we abided by your --

3 Q. That's not question.

4 A. -- request. I'm sorry.

5 Q. My question is: Did she go through each  
6 message on your cell phone?

7 A. I can't speak for her, but I will tell you that  
8 I feel that she did, yes.

9 Q. Did you go through each message on your phone?

10 A. Of course.

11 Q. E-mail and text?

12 A. Yes.

13 Q. Let's talk about the resolution that was  
14 introduced by you at the November 19, 2020 meeting. Do  
15 you recall that?

16 A. Yes.

17 Q. What was the first communication you had  
18 relating to the need for that resolution?

19 MR. LEVESQUE: Object to the form. I'm going  
20 to instruct her not to answer. If you want to ask  
21 her about records she received related to it or  
22 something like that, that would be more appropriate.

23 MR. BARFIELD: Communications includes records.

24 MR. LEVESQUE: Understood. But communications  
25 also could include verbal communications and --

1           MR. BARFIELD: I'm going to ask her about them  
2           and I'm entitled to ask about any communications she  
3           had about them.

4           MR. LEVESQUE: I would respectfully disagree,  
5           but go ahead and ask your questions and we'll go  
6           forward.

7 BY MR. BARFIELD

8           Q.    What was the first communication you had  
9           relating to that resolution?

10          MR. LEVESQUE: If there's a record of that  
11          communication that you recall and you can answer,  
12          otherwise I'm going to instruct you not to answer.

13          THE WITNESS: Not answering. There's no --

14          MR. BARFIELD: You're refusing to answer that  
15          question? On what grounds?

16          MR. LEVESQUE: On the grounds that it's beyond  
17          the scope of permissible discovery. It's not  
18          relevant to ascertaining the records. If you can  
19          demonstrate to me that it's ascertaining whether  
20          other records exist, then we can go there.

21          MR. BARFIELD: It's pled in your complaint.

22          MR. LEVESQUE: There are lots of things in the  
23          complaint that have nothing to do with whether  
24          records exist that you're entitled to.

25          MR. BARFIELD: We'll come back to that.



1 BY MR. BARFIELD

2 Q. When was the first time that you saw that  
3 resolution?

4 A. Trying to remember. Middle part of November.  
5 I don't recall the exact date.

6 Q. How did you come about that resolution? Let me  
7 back up. Did you draft that resolution?

8 A. No.

9 Q. Have you previously made statements that you  
10 did?

11 A. Yes.

12 Q. How many times?

13 A. Once.

14 Q. Just once?

15 A. I believe so.

16 Q. And who drafted the resolution?

17 MR. LEVESQUE: Object to the form. I'm going  
18 to instruct her not to answer. Either -- that  
19 information is either in a record that was  
20 provided -- you don't get to ask her about the  
21 documents. You get to ask her about whether  
22 documents exist.

23 MR. BARFIELD: Okay. Let's stop the  
24 deposition. It is 10:30. And we are going to call  
25 Judge Sniffen's office.

1 MR. LEVESQUE: Fair enough.

2 (Telephone call begins.)

3 THE CLERK: Judge's chambers.

4 MR. BARFIELD: Good morning, Ruth. This is  
5 Michael Barfield. I am here with Attorney George  
6 Levesque. And we are in the middle of a deposition  
7 with the court reporter and the witness Vanessa  
8 Baugh. And we have an issue that we hope that Judge  
9 Sniffen is available to -- that needs resolution.

10 THE CLERK: Let me see if he's available. Hold  
11 on, please.

12 MR. BARFIELD: Thank you.

13 THE CLERK: Sir?

14 MR. BARFIELD: Yes, ma'am.

15 THE CLERK: Hello?

16 MR. BARFIELD: Yes.

17 THE CLERK: Can I find -- how much time do you  
18 think this -- is needed?

19 MR. BARFIELD: I think -- Mr. Levesque says ten  
20 minutes, I say five, but, you know --

21 MR. LEVESQUE: And it could be five.

22 THE CLERK: Can I get your phone number and  
23 give you a call back shortly?

24 MR. BARFIELD: Sure. It's (941) 228-1575. And  
25 we could do it by Zoom if you wanted us to do that.

1 We have that capability here.

2 THE CLERK: Okay. I will find out and get back  
3 with you maybe about five, ten minutes. Okay?

4 MR. BARFIELD: Okay. Thank you, Ruth.

5 THE CLERK: All right. Thank you, bye.

6 (Telephone call concludes.)

7 MR. BARFIELD: George, you want to wait until  
8 we --

9 MR. LEVESQUE: That's fine with me.

10 MR. BARFIELD: We agree we are --

11 MR. LEVESQUE: Yeah, we are in a pause. We're  
12 paused. I'm not running the clock now, if that's  
13 what you're asking.

14 MR. BARFIELD: Thank you.

15 (Telephone call begins.)

16 This is Michael Barfield.

17 THE CLERK: Hi, it's Ruth from Judge Sniffen's  
18 office. Are you available right now?

19 MR. BARFIELD: We are.

20 THE CLERK: Now, last time you had called on a  
21 conference call. Do you want to hang up and call  
22 back and I'll -- I can patch you through to the  
23 judge's office?

24 MR. BARFIELD: We are all here together, so --  
25 and we are all listening at the same time. Is that

1 what you want us to do?

2 THE CLERK: Right now you're all available?

3 MR. BARFIELD: Yes, yes, we are.

4 THE CLERK: Okay. I'll go ahead and transfer  
5 the call into the judge's office then. Okay?

6 MR. BARFIELD: Thank you, Ruth.

7 THE CLERK: Hold, please.

8 THE COURT: Hi, it's Judge Sniffen.

9 MR. BARFIELD: Good morning, Judge Sniffen. We  
10 are sorry to bother you. I'm here, Michael  
11 Barfield, with attorney George Levesque and his  
12 client Vanessa Baugh, the court reporter, and  
13 Chrisann Allen with my office.

14 We have an issue that the Court needs to  
15 address. Mr. Levesque has instructed the witness  
16 not to answer questions relating to a resolution  
17 R-2191 that was approved by the Manatee County  
18 Commission on November 19 of 2020. These matters  
19 are set forth in the amended complaint in quite some  
20 detail from paragraphs 36 through 51.

21 And the issue is that the witness has  
22 previously stated and has just acknowledged that she  
23 made a statement at that public meeting on  
24 November 19 that she drafted this resolution. She  
25 has now acknowledged that she did not draft the

1 resolution.

2 I have asked her questions about who did draft  
3 it, how she obtained it, and other circumstances  
4 surrounding that resolution to which Mr. Levesque  
5 has objected and instructed the witness not to  
6 answer.

7 And I'll let -- I apologize if I'm  
8 mischaracterizing Mr. Levesque's objections, but  
9 that is the issue. And I'll let him speak now, your  
10 Honor.

11 THE COURT: Thank you.

12 Hi, Mr. Levesque, it's Judge Sniffen.

13 MR. LEVESQUE: Hi, Judge Sniffen, this is  
14 George Levesque. And this is one of the things that  
15 we addressed in our case management conference.  
16 There's -- in the form of sworn system in the  
17 verified response, Commissioner Baugh has set forth  
18 everything related to the information necessary to  
19 ascertain whether additional records exist.

20 The complaint is seeking an original electronic  
21 version, the native file version of that document.  
22 And what Commissioner Baugh has set forth both in  
23 the verified response and, if asked the appropriate  
24 questions, would demonstrate that she does not, in  
25 fact, have the native file because she did not draft

1 the document. It was handed to her.

2 We believe the scope of appropriate discovery  
3 would be to ascertain whether specific records exist  
4 or not and whether they've been produced or not.  
5 Not sources of records where the information is not  
6 contained in a record.

7 The Coca-Cola case that I referenced  
8 previously, which is 582 So.2d 1, specifically  
9 clarifies that these types of actions are designed  
10 to get access to the records. They're not designed  
11 to elicit oral testimony about the records.

12 And that the public records law entitled access  
13 to records, not testimony about the records. So to  
14 the extent that he's going beyond that, we believe  
15 it's inappropriate and harassing on this particular  
16 issue.

17 THE COURT: Mr. Levesque, can you give me that  
18 cite again?

19 MR. LEVESQUE: It is 582 So.2d 1. And the case  
20 name is State vs. Coca-Cola Bottling Company of  
21 Miami, Incorporated, a Fourth District case from  
22 December 19, 1990.

23 THE COURT: All right. Everybody standby for a  
24 few seconds while I scan through here. Okay? All  
25 right. Thank you.

1           Mr. Barfield, what's your response?

2           MR. BARFIELD: Your Honor, number one, we are  
3 in deposition and I believe that the rule is that if  
4 the question is designed to discover other evidence.  
5 And in that, that is exactly what this seeks to do.

6           The statute 119.01(2)(f) provides that if the  
7 document exists in its native medium or format, that  
8 I am entitled to it. And these questions are  
9 designed to determine who it is that has the record  
10 so that we can obtain the native format of the  
11 document as well as any other records surrounding  
12 the creation and transmission of this particular  
13 record.

14           I do not think that the Coca-Cola case is on  
15 point because there was -- that was designed to get  
16 information about settlement discussions that  
17 occurred and that was within the attorney-client  
18 privilege. There is no assertion here of the  
19 attorney-client privilege as far as I understand.

20           MR. LEVESQUE: If I may respond, your Honor.

21           THE COURT: Of course.

22           MR. LEVESQUE: In response to the notion that  
23 he would be entitled to the native format, I'm not  
24 aware of any cases that would extend that type of --  
25 that type of public records obligation for

1 disclosure where a private citizen hands a paper  
2 document to a government official that would then  
3 allow someone requesting the record to go back to  
4 that private citizen and say, you have to give me  
5 the native file of the document that you provided in  
6 hard copy form to the government official.

7 I don't think that is the scenario that we're  
8 talking about in terms of appropriate discovery of  
9 the original documents. It would be a different  
10 story if it was drafted by Commissioner Baugh  
11 herself or one of the county staff and that the  
12 county staff created that document and then provided  
13 it, Commissioner Baugh.

14 That is not what is set forward in our sworn  
15 response. That is not what the questions are  
16 designed to do. And to the extent that we are  
17 talking about the native form of that electronic  
18 document existing in some private citizen's hands, I  
19 don't think that is something that would -- the  
20 public records law would extend to.

21 MR. BARFIELD: Your Honor, briefly, if I may.

22 THE COURT: Of course.

23 MR. BARFIELD: The statute itself is the  
24 authority for the requirement of the native digital  
25 format. There are a number of cases out there.



1 NCAA vs. Associated Press where records were on a  
2 computer hard drive in Nebraska at the offices of NC  
3 -- the NCAA.

4 And there was an intent in that case to keep  
5 the records off of the 119 grid, if you will. And  
6 the First District Court of Appeal said it doesn't  
7 matter. If it's a private individual who is  
8 communicating with public officials about public  
9 business, it becomes a public record.

10 And it didn't matter in that case to the 1st  
11 DCA that the computer was on a hard drive -- I'm  
12 sorry, that the record was on a hard drive in  
13 Nebraska. They ordered that it be produced.

14 And so there are also issues here, your Honor,  
15 of motive. The witness publicly stated that she  
16 drafted the resolution and now she has changed that  
17 testimony in her sworn response filed last month and  
18 in her testimony today to say that she did not draft  
19 it.

20 I think I am entitled to some leeway as to what  
21 the circumstances of how this record came into  
22 existence and whether there are any other records  
23 that exist relating to the creation of this  
24 resolution. It was a critical document that started  
25 this entire case.

1           MR. LEVESQUE: Your Honor, the NCAA case that  
2           Mr. Barfield cites involves a scenario where the  
3           NCAA wanted to share documents with the state and  
4           the state and the NCAA wanted to shield those  
5           documents entirely from public records disclosure.

6           So what they did was they developed a  
7           screen-sharing protocol that would allow them to  
8           view the documents without actually taking  
9           possession of them. That is not what we are talking  
10          about here.

11          We are talking about a hard copy document that  
12          was provided to Commissioner Baugh, hand-delivered.  
13          That document has been produced to Mr. Barfield.  
14          And the NCAA case doesn't address the native file  
15          format or any of the -- it doesn't discuss those  
16          things.

17          It's discussed in the context of can government  
18          agencies find creative ways to circumvent the public  
19          records law. That's -- that is not what we are  
20          dealing with here.

21          What he's essentially requesting is oral  
22          testimony concerning documents that have been  
23          produced. We believe that goes beyond the scope of  
24          the public records law.

25          There is no motive element analyzing whether a

1 public record exists and whether it should be  
2 produced under an exemption or not. If it's a  
3 public record, it will be produced. Here we've  
4 produced the public record.

5 MR. BARFIELD: Your Honor, just one thing I  
6 forgot to mention, is attached as Exhibit 19 to the  
7 first amended complaint, which Mr. Levesque has a  
8 copy of as well, the Clerk of Court of Manatee  
9 County, who's also the clerk for the board, on  
10 November 20, 2020, in that e-mail, specifically  
11 asked Ms. Baugh, reminded her that they needed a  
12 Word version of the resolution.

13 I'm quoting, hi, just a reminder that we need  
14 the Word version of the resolution. Thank you,  
15 Vicki Tessmer, supervisor board records.

16 There were at least two other e-mails from the  
17 board clerk, Ms. Tessmer, to Ms. Baugh asking for  
18 that electronic version because they needed it for  
19 their records. And those are attached to the  
20 complaint as well.

21 So, your Honor, I do believe this issue is  
22 fairly within the scope of the issues that  
23 ultimately need to be decided by the Court.

24 MR. LEVESQUE: And if I could just add one  
25 thing, your Honor. Mr. Barfield referenced a

1 subsequent e-mail that was sent by Ms. Tessmer to  
2 Ms. Baugh. And there was such an e-mail that was  
3 sent. The date and times are not included, but it's  
4 Exhibit 20 to the complaint.

5 And Ms. Tessmer's asking is there a PDF or Word  
6 version that we could print and sign for the record.  
7 They were actually looking for a document that they  
8 could incorporate into the official record. It  
9 didn't have to be a Word version.

10 As they referenced, they just needed a hard  
11 copy that they could incorporate for their records.  
12 And a hard copy, the original copy, as I understand  
13 it, was provided to them.

14 THE COURT: All right. Final thoughts,  
15 Mr. Barfield?

16 MR. BARFIELD: Yes, your Honor. At Exhibit 17  
17 in the complaint, the actual resolution, it was  
18 noted by the chair of the Board of County  
19 Commissioners at the time that, quote, original not  
20 provided to county by Vanessa Baugh.

21 And there was no PDF provided. What Ms. Baugh  
22 did was take a photograph on her cell phone of the  
23 resolution and then converted that to a PDF in an  
24 effort to -- I will argue in an effort to disguise  
25 the origin of that document and communications

1 relating to the preparation of that document.

2 MR. LEVESQUE: And there is no evidence --

3 THE COURT: Mr. Levesque, you can have the  
4 final word.

5 MR. LEVESQUE: There is no evidence of that  
6 being a motive or substantiated. The -- if it's a  
7 photo of the document that was provided, and there  
8 have been several photos that have circulated, all  
9 of those photos match the document that was provided  
10 and waved around in the commission hearing.

11 THE COURT: All right. So I've reviewed the  
12 authorities that both parties have cited, including  
13 the cases cited by Mr. Levesque and Mr. Barfield. I  
14 have some familiarity with the statute and certain  
15 case law that has construed the statute.

16 I believe this inquiry, when we are going  
17 forward in a mandamus proceeding from production of  
18 records, should be limited to the existence of  
19 records and whether or not they were produced.

20 I can understand Mr. Barfield's concern or  
21 suspicion, if that's a fair way to characterize his  
22 position, but I don't believe that the public  
23 records statute permits a wholesale investigation of  
24 the thought processes and motivations of the people  
25 who are the subject of the request. The questions

1           only are do the records exist and have they been  
2           produced.

3           So I'm going to treat this conversation as  
4           Mr. Levesque's motion for a protective order. I'm  
5           going to grant the protective order to the extent  
6           that the scope of examination goes beyond the  
7           subject of whether the records exist and whether or  
8           not they were produced.

9           I will expand that to some degree to permit  
10          Mr. Barfield to inquire about what forms records  
11          might exist, but I think going into what the origin  
12          of documents were, who possessed them, when they  
13          were processed, things like that go beyond what is  
14          contemplated by the statute.

15          So Mr. Barfield, to the extent that I limited  
16          the scope and you may eventually want appellate  
17          review of my ruling, is there anything else that you  
18          need me to specify, to clarify that ruling for the  
19          record?

20          MR. BARFIELD: Your Honor, as I understand your  
21          ruling, and thank you, I am permitted to inquire  
22          about what form of records that may exist  
23          surrounding this resolution, but not as to the  
24          reasons why it was created or -- does that include  
25          who created the document as well?

1           THE COURT: Yes, it does. So I'm not -- I'm  
2 excluding the information about how the document was  
3 created. I think the sole issue is does the  
4 document or record exist and was it produced. And I  
5 will expand does it exist to include any forms that  
6 exist that are known to the witness. How it was  
7 created, when it was created, et cetera, by whom, I  
8 think those are beyond the scope so I'm going to  
9 exclude those.

10           MR. BARFIELD: Okay. I understand your ruling,  
11 your Honor. I would just ask that it be without  
12 prejudice to revisit it at the final hearing should  
13 I convince you to change your mind.

14           THE COURT: Agreed. I will enter that ruling  
15 without prejudice.

16           MR. BARFIELD: Thank you, Judge. Thank you for  
17 your time.

18           MR. LEVESQUE: Thank you, your Honor.

19           MR. BARFIELD: Appreciate it.

20           THE COURT: No problem. I'm glad I can help.

21           Mr. Levesque, anything else you would like me  
22 to say for the record?

23           MR. LEVESQUE: No, your Honor. And thank you  
24 for being able to fit us in on short notice. We  
25 appreciate it.

1 THE COURT: I'm glad to do it. That's  
2 basically the only thing I'm here for. So when I  
3 have the time, I'm glad to help. So good luck  
4 everybody. If you need me, I should be around for  
5 the next 20, 30 minutes if anything else comes up.

6 MR. BARFIELD: Okay. Judge, thank you.

7 THE COURT: All right. Thank you. Have a good  
8 weekend.

9 MR. BARFIELD: Bye-bye.

10 (Telephone call concludes.)

11 Can we take a few minutes' break and then we'll  
12 restart?

13 MR. LEVESQUE: Sure.

14 (A short recess was taken).

15 MR. BARFIELD: It's 11:00. Mr. Levesque, stop  
16 at 11:30; is that fair?

17 MR. LEVESQUE: I've got us going -- that would  
18 be fair.

19 BY MR. BARFIELD

20 Q. Okay. Back to the resolution. When was the  
21 date that you received the resolution?

22 A. I don't recall the exact date. I would say  
23 maybe near the middle of November.

24 Q. Middle of November. And so some time prior to  
25 the 18th of November, correct? Because that's when you



1 had a discussion and forwarded it to Mr. Clegg on the  
2 18th; do you recall that?

3 A. Yes.

4 Q. So some time middle 15th through the 18th, in  
5 that time frame?

6 A. I can't recall.

7 Q. And you received it by hand delivery?

8 A. Yes.

9 Q. Did you also receive it by e-mail?

10 A. No.

11 Q. Did you receive it by mail?

12 A. No.

13 Q. It was hand delivered to you by an individual;  
14 is that correct?

15 A. Yes.

16 Q. And was -- were you at the county building when  
17 this occurred?

18 A. Yes. I had to stop and think.

19 Q. In your office?

20 A. No.

21 Q. Where in the county building?

22 A. The lobby.

23 Q. Did you have an appointment with this  
24 individual that delivered the resolution?

25 A. No.

1 Q. How did you know to meet with them in the  
2 lobby?

3 A. I had run into them earlier.

4 Q. And they said, I have a resolution, here you  
5 go?

6 MR. LEVESQUE: Objection. I'm going to  
7 instruct her not -- I think that's going a little  
8 bit further than what Judge -- and even some of the  
9 questions already.

10 BY MR. BARFIELD

11 Q. Was it just a random encounter that led to this  
12 or you ran into them in the lobby?

13 A. Outside.

14 Q. Outside of the lobby?

15 A. Yes.

16 Q. Randomly?

17 A. Yes.

18 Q. Okay. And what did you do after you received  
19 the hard copy document?

20 MR. LEVESQUE: Objection. I think the judge's  
21 order doesn't -- doesn't go to the issue of what she  
22 did with the document afterwards. That's the who  
23 and all of the things that were covered by his  
24 ruling.

25 MR. BARFIELD: I thought he allowed other forms

1 of the record that -- what I'm getting to --

2 MR. LEVESQUE: Okay. Fair enough.

3 BY MR. BARFIELD

4 Q. What did you do with the hard copy document  
5 after you received it?

6 A. Took a picture of it to send to the county  
7 attorney.

8 Q. County attorney wanted the resolution?

9 A. I wanted to make sure that it was appropriate  
10 to bring for our board. I wanted him to look at it and  
11 say it was proper.

12 Q. Other than taking a picture of the document,  
13 did you convert it into any other record format?

14 A. No.

15 Q. Never had it scanned?

16 A. No.

17 Q. Where is the original document at?

18 A. To be honest, I would assume -- and I'm going  
19 to have to answer this as an assumption -- one of the  
20 other commissioners have it.

21 Q. What did you do with the physical copy that you  
22 got?

23 A. I asked someone, one of the assistants, to make  
24 copies of it for me to present to all the commissioners  
25 in our meeting.

1 Q. And which assistant did you ask for that, to do  
2 that?

3 A. I want to say it was Celeste.

4 Q. And do you recall when you asked her to do  
5 that?

6 A. The morning of the commission meeting.

7 Q. November 19th?

8 A. Yes. I guess that was the day.

9 Q. So the original copy that you got from mystery  
10 person, you gave it to Celeste?

11 A. Uh-huh.

12 Q. You have to answer yes or no.

13 A. Yes.

14 Q. And that's the last you saw of it?

15 A. The copies with the original was brought back  
16 to me. And then I distributed it, them, to all the  
17 commissioners and Mr. Clegg.

18 Q. And the original was maintained by you or you  
19 don't know?

20 A. No.

21 Q. You can't say where the original is?

22 A. I don't know.

23 Q. Are you certain that the original document was  
24 included in the distribution?

25 A. Yes.

1 Q. How are you sure?

2 A. Because I remember when Celeste handed me the  
3 copies and the original.

4 Q. And then the next day -- I'm sorry, same day,  
5 November 19, you then handed out the original and copies  
6 to your colleagues on the commission?

7 A. Yes.

8 MR. LEVESQUE: Object to form.

9 BY MR. BARFIELD

10 Q. And how many copies did Celeste make all  
11 together?

12 A. Eight or nine.

13 Q. And when did -- what did you do after Celeste  
14 made the copies? Other than your six colleagues on the  
15 board, did you give anyone else a copy?

16 A. The county attorney's office. He was setting  
17 it up and he was in the meeting. And I thought the clerk  
18 had received one too, but I'm going to assume now that  
19 she didn't after her e-mail, but I thought she had  
20 received one as well. Other than that, that's it.

21 Q. Between the time that you received the document  
22 in the lobby and the time that Celeste made copies, were  
23 there any changes made to the document?

24 A. No.

25 Q. Were there any subsequent records exchanged

1 between you and the individual who you received the draft  
2 resolution from?

3 A. No. Does that -- are we talking e-mails? What  
4 are we talking?

5 Q. E-mails or text messages.

6 A. No.

7 Q. Phone calls?

8 A. No.

9 Q. At any point in time did the county attorney,  
10 either Mr. Palmer or then-Chief Deputy Clegg, ask you for  
11 the original copy?

12 A. Not that I recall.

13 Q. Did they ask you who drafted the resolution?

14 A. No.

15 MR. LEVESQUE: Object to form.

16 THE WITNESS: Sorry.

17 BY MR. BARFIELD

18 Q. When you received e-mails from Ms. Tessmer  
19 asking you for the Word or PDF version, did you respond  
20 to her?

21 A. As soon as I was able to sit down and reply to  
22 e-mails, yes.

23 Q. Do you recall when that was?

24 A. I do not.

25 Q. It was not the same day, was it?

1 A. No.

2 Q. In fact, she sent you at least three e-mails  
3 asking you to forward the document, correct?

4 A. I don't recall how many e-mails.

5 Q. More than one?

6 A. I don't recall.

7 Q. Well, do you want to take the time to look  
8 through -- back at the complaint?

9 A. No, if you -- no, I don't need to do that.

10 Q. You don't dispute that there was more than one,  
11 correct?

12 A. No.

13 MR. LEVESQUE: Mr. Barfield, are you going  
14 somewhere for additional records with that line of  
15 questioning.

16 MR. BARFIELD: Yes.

17 MR. LEVESQUE: Okay.

18 BY MR. BARFIELD

19 Q. Ultimately you did send the clerk a record --

20 A. Yes.

21 Q. -- of the resolution?

22 A. Yes.

23 Q. And it was a -- what form was it in?

24 A. I took a picture of it with my phone.

25 Q. You still had the original or a version or you

1 don't know?

2 A. I had a version. As we all did.

3 Q. Did you have a signed version at that point or  
4 just an unsigned version?

5 A. No, just an unsigned.

6 Q. And you forwarded that at some point to  
7 Ms. Tessmer?

8 A. Yes.

9 Q. Did you send that resolution to anyone else  
10 either before -- well, let me strike that.

11 Did you send that resolution to anyone else at  
12 any point in time after you received it from the  
13 individual in the lobby?

14 A. Not that I recall. Other than the county  
15 attorney.

16 Q. So other than the county attorney, you can't  
17 recall one way or another whether you sent it to anyone  
18 else?

19 A. No, no.

20 Q. Is it possible that you sent it to someone  
21 else?

22 A. No.

23 Q. It's not possible?

24 A. No, I don't -- not as I recall, no. Why would  
25 I? I mean, there was no reason to. And if I did, you



1 would have had that e-mail.

2 Q. Well, did you send it by perhaps text message  
3 to someone?

4 A. No.

5 Q. So earlier when you said you couldn't recall,  
6 now you're saying no, you didn't. Is that an emphatic  
7 no, that you did not send it to anyone else after you  
8 received it from the individual in the lobby?

9 A. Very doubtful.

10 MR. LEVESQUE: Object to the form.

11 THE WITNESS: Not that I recall.

12 BY MR. BARFIELD

13 Q. Who's your cell phone provider?

14 A. Sprint.

15 Q. Was it Sprint in November of 2020?

16 A. Yes.

17 Q. And with Sprint you have the ability to log in  
18 to your account and look at your account, correct?

19 A. Yes.

20 Q. Have you done that from time to time?

21 A. Yes.

22 Q. Did you do that in this case to obtain your  
23 cell phone records?

24 A. Yes.

25 Q. And any text messages as well?

1 A. Yes.

2 Q. And on your iPad or other electronic devices,  
3 aside from your personal cell phone, can you log in to  
4 your Sprint account and send or receive text messages as  
5 well?

6 A. I don't know.

7 Q. Have you ever done that?

8 A. No.

9 Q. So you only send texts via your iPhone?

10 A. Uh-huh.

11 Q. You have to say yes or no.

12 A. I'm sorry, yes.

13 Q. When you received the requests, number 1 and 2,  
14 for social media accounts, any public business on social  
15 media accounts, did -- at that time did you review your  
16 Parler account to determine whether there were any  
17 records on there that may be responsive?

18 A. Yes.

19 Q. You did?

20 A. Yes.

21 Q. And you didn't find any?

22 A. No.

23 Q. And Facebook?

24 A. Somewhat.

25 Q. You did review it?

1 A. Yes.

2 Q. And did you find any on Facebook?

3 A. To be honest, I was told that I didn't need to  
4 worry about Facebook because it was public and you could  
5 see it.

6 Q. Who told you?

7 A. The county.

8 Q. Who in the county?

9 A. Debbie Scaccianoce.

10 Q. And do you remember when she told you that?

11 A. No, but it had to be when this first started.

12 Q. Did you -- so you didn't produce any Facebook  
13 or social media messages to the county to provide to me?

14 MR. LEVESQUE: Object to the form.

15 You can answer if you understand the question.

16 THE WITNESS: No.

17 BY MR. BARFIELD

18 Q. And you didn't produce any Messenger -- you  
19 know what Facebook Messenger is?

20 A. Yes.

21 Q. Did you review that?

22 A. Yes.

23 Q. And you didn't produce any from there either,  
24 did you?

25 A. No. There was nothing there that was county

1 business.

2 Q. Did you preserve all of the records that were  
3 subject to this request?

4 MR. LEVESQUE: Object to the form.

5 You can answer.

6 THE WITNESS: Yes.

7 BY MR. BARFIELD

8 Q. And you still have them?

9 A. Yes.

10 Q. Where are they located now?

11 A. On my phone.

12 Q. Have you backed your phone up at all --

13 A. No.

14 Q. -- since then?

15 A. No.

16 Q. Has anyone assisted you in archiving or backing  
17 up your phone since the record requests were made in this  
18 case?

19 A. No.

20 Q. So they're still on your phone as far as you  
21 know?

22 A. Yes.

23 Q. And what about your -- when did -- when did  
24 Parler -- when was it deplatformed? Do you know what I'm  
25 referring to when I say that?

1           A.    I do, yes.  I'll be honest, I don't know the  
2 date.  I know it was removed by Amazon.  That's all I  
3 know.  I don't recall the date.

4           Q.    Do you recall that it was shortly after the  
5 incident that occurred at the capitol in January of this  
6 year?

7           A.    No, I thought it would have been before that,  
8 to be honest.  Sorry, I --

9           Q.    But you --

10          A.    It didn't stand out for me to remember the  
11 date.  I'm sorry, no.

12          Q.    And prior to that point in time, you had made  
13 no effort to archive or backup your Parler account?

14          A.    No.

15          Q.    And you are certain that there was nothing  
16 posted on your Parler account relating to official  
17 Manatee County business?

18          A.    There was nothing.

19          Q.    Because you reviewed it, correct?  Wasn't that  
20 your testimony earlier, a few minutes ago?

21          A.    I went through it, yes, but I already knew  
22 there wasn't anything on there because there was only one  
23 reason I was on Parler.

24          Q.    And what was that reason?

25          A.    To be able to get posts from our president.

1 Q. Did your Parler account and the description of  
2 who you were indicate Manatee County commissioner?

3 A. I don't think so. I'll be honest, I don't  
4 recall that, but I don't think so.

5 Q. So Parler wasn't deplatformed prior to this  
6 records request, correct?

7 MR. LEVESQUE: Object to the form.

8 THE WITNESS: I can't say for sure.

9 BY MR. BARFIELD

10 Q. Well, you said that you reviewed your Parler  
11 account to see if there were any records on there,  
12 correct?

13 A. I never did any county business on Parler.

14 Q. That's not my question.

15 A. Okay.

16 Q. Did you review your Parler account? Earlier  
17 you testified you reviewed it to see if there was  
18 anything public record on there.

19 A. I finally -- yes, I tried to look at everything  
20 I possibly could to make sure that I had it all.

21 Q. So by necessity, it wasn't shut off -- Parler  
22 wasn't shut off at the time you received these records  
23 requests, was it?

24 A. I don't think so. I just can't say when it  
25 happened.

1 Q. Are you aware of the fact that if someone posts  
2 on your Facebook page and they block another individual,  
3 that the other individual can't see their post on  
4 Facebook?

5 A. I'm not that -- no, I didn't know that. No,  
6 I'm sorry.

7 Q. Do you recall the date that you first forwarded  
8 text messages to the county through your Manatee County  
9 account that were responsive to the records requests?

10 A. I don't recall the exact date.

11 Q. Other than Ms. Scaccianoce -- am I saying that  
12 correctly?

13 A. Pretty close.

14 Q. Did anyone else assist you in reviewing your  
15 private devices or accounts to determine whether there  
16 were any records responsive to your request?

17 A. My attorney's office.

18 Q. And your attorney being Mr. --

19 A. Levesque.

20 Q. And anyone else outside of his office?

21 A. I don't believe so.

22 Q. Do you recall forwarding the records requests  
23 to other individuals after you received them?

24 A. Perhaps the county attorney.

25 Q. Anyone else? Anthony Pedicini?

1 A. I don't think so. Not that I recall.

2 Q. Kristy Zinna?

3 MR. LEVESQUE: At this point that goes well  
4 beyond whether records exist for this case. You're  
5 talking about things that are happening after she's  
6 already received the requests. So I think we are  
7 going to shut that one down.

8 BY MR. BARFIELD

9 Q. Maybe this will help. Did you reach out to  
10 anyone about recovering or resurrecting any records that  
11 you had or may have had in your possession that may have  
12 been responsive to the records requests in this case?

13 MR. LEVESQUE: Object to the form.

14 You can answer if you understand the question.

15 THE WITNESS: No, not that I recall.

16 BY MR. BARFIELD

17 Q. You didn't ask anyone else, hey, I don't know  
18 if I have this, do you have it and can you provide it to  
19 me?

20 A. Boy. Not that I recall.

21 Q. You may have, but you just don't recall?

22 A. I don't recall ever doing that, no. I will  
23 tell you that I really did the best that I could to make  
24 sure I got everything that you wanted.

25 Q. Are you aware that you can export your Facebook



1 page from within Facebook electronically?

2 A. No, sorry.

3 Q. Would that be difficult for you -- is there  
4 some difficulty in doing that?

5 A. I've never heard of it so I can't answer that  
6 question. I have no clue.

7 Q. Okay.

8 A. I'm old.

9 MR. BARFIELD: I don't have any further  
10 questions at this time.

11 MR. LEVESQUE: I've got just one or two.

12 CROSS-EXAMINATION

13 BY MR. LEVESQUE

14 Q. Commissioner Baugh, from the time the public  
15 records came in, have you purposefully deleted any  
16 responsive public records?

17 A. No.

18 MR. BARFIELD: Object to form.

19 BY MR. LEVESQUE

20 Q. Are you aware of any records that are  
21 responsive to the public records requests being  
22 inadvertently deleted?

23 A. No.

24 MR. LEVESQUE: No further questions.

25 MR. BARFIELD: I don't think I have any more.

1           MR. LEVESQUE:  If there's a transcript ordered,  
2           we'll read and sign.

3           (The taking of this deposition was concluded at  
4           11:27 a.m.)

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CERTIFICATE OF OATH

STATE OF FLORIDA

COUNTY OF MANATEE

I, MELISSA ENGLAND, the undersigned authority, certify that VANESSA BAUGH personally appeared before me on May 14, 2021, at 9:54 a.m. and was duly sworn.

WITNESS my hand and official seal this 24th day of May, 2021.



MELISSA ENGLAND  
Commission # GG 127050  
Expires November 9, 2021  
Bonded Thru Budget Notary Services

MELISSA ENGLAND, NOTARY PUBLIC  
State of Florida  
Commission No.: GG 127050  
Commission Expires: 11/9/2021

Personally Known: No  
Produced Identification: Yes  
Type of I.D. Produced: Florida Driver's License

## CERTIFICATE OF REPORTER

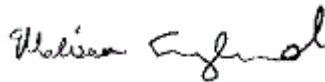
STATE OF FLORIDA

COUNTY OF MANATEE

I, Melissa England, do hereby certify that I was authorized to and did stenographically report the deposition of VANESSA BAUGH; that a review of the transcript was requested; and that the foregoing transcript, pages 1 through 65, is a true record of my stenographic notes.

I FURTHER CERTIFY that I am not a relative, employee, or attorney, or counsel of any of the parties, nor am I a relative or employee of any of the parties' attorneys or counsel connected with the action, nor am I financially interested in the action.

DATED this 24th day of May, 2021 at Manatee County, Florida.



---

Melissa England

ERRATA SHEET

DO NOT WRITE ON TRANSCRIPT - ENTER CHANGES

RE: Michael Barfield vs. Vanessa Baugh

CASE NO.: 2020-CA-4699

DEPONENT: Vanessa Baugh

DATE: May 14, 2021

Page No.	Line No.	Change	Reason

Under the penalties of perjury, I declare that I have read the foregoing document and that the facts stated in it are true.

DATE VANESSA BAUGH

ORIG: Michael Barfield, pro se, michael@denovolawfl.com

COPY: George Levesque, Esq.,  
george.levesque@gray-robinson.com

May 24, 2021

Vanessa Baugh  
c/o George Levesque, Esq.  
Gray Robinson, P.A.  
george.levesque@gray-robinson.com

In Re: Deposition of Vanessa Baugh taken on 5/14/21  
Michael Barfield vs. Vanessa Baugh

Dear Sir:

This letter is to advise that the transcript for the above-referenced deposition has been completed and is available for review. Please have your client contact Imperial Court Reporting at (941) 260-9000 to make arrangements to read and sign the transcript at our office within 30 days from the date of this letter; otherwise, they may sign below to waive review of this transcript and email this page to the email address below.

In the alternative, if you have ordered a copy of the transcript and will be handling reading and signing, have your client make note any corrections on the errata sheet provided and email it to admin@imperialcourtreporting.com to be forwarded to all parties for inclusion in the transcript.

Sincerely,

Imperial Court Reporting

cc: Michael Barfield, michael@denovolawfl.com

Waiver:

I, \_\_\_\_\_, hereby waive the reading & signing of my deposition transcript.

\_\_\_\_\_  
Deponent Signature

\_\_\_\_\_  
Date

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