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IN RE: AARON ZAHN - TERMINATION OF EMPLOYMENT  
AGREEMENT WITH JEA

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SWORN STATEMENT  
OF  
WALETTE STANFORD

DATE TAKEN: Friday, January 10, 2020  
 TIME: 3:06 p.m. - 4:10 p.m.  
 PLACE: Office of General Counsel  
 117 West Duval Street  
 Suite 480  
 Jacksonville, Florida

REPORTED BY: Marianne Branson, RPR, FPR  
 Court Reporter  
 - - -

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1 APPEARANCES FOR THE CITY OF JACKSONVILLE:  
 2 STEPHEN J. POWELL, ESQUIRE  
 ADINA TEODORESCU, ESQUIRE  
 3 SEAN GRANAT, ESQUIRE  
 ARIEL COOK, ESQUIRE  
 4 Office of General Counsel  
 117 West Duval Street  
 5 Suite 480  
 Jacksonville, Florida 32202

6  
 7 APPEARANCE FOR THE OFFICE OF INSPECTOR GENERAL:  
 8 ROBERT LINSNER, INVESTIGATOR  
 Office of Inspector General - City of Jacksonville  
 9 231 East Forsyth Street  
 Suite 470  
 10 Jacksonville, Florida 32202

11  
 12 ALSO PRESENT:  
 13 CHRISTINA M. SCHWING, ESQUIRE  
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I N D E X

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 3 WITNESS: WALETTE STANFORD  
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 5 EXAMINATION  
 6 By Mr. Powell . . . . . 5  
 7 CERTIFICATE OF REPORTER . . . . . 43  
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 11 - - -  
 12  
 13  
 14 EXHIBITS  
 15 1 12-13-19 email to Zahn Re Family Trust, 15  
 with attachments  
 16  
 17 2 12-13-19 email to Zahn Re Southern Group, 16  
 with attachments  
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 22  
 23  
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1 MR. LINSNER: This recorded interview is  
 2 being conducted at the Office of General Counsel,  
 3 City of Jacksonville. Today is January 10th,  
 4 2020. The time now is 3:06 p.m.

5 I'm Investigator Robert Linsner, employed by  
 6 the Office of Inspector General, City of  
 7 Jacksonville. The Office of Inspector General is  
 8 assisting the Office of General Counsel with its  
 9 investigation regarding Aaron Zahn, former CEO of  
 10 JEA.

11 Ms. Walette Stanford, you are being  
 12 interviewed as a witness in this investigation.  
 13 If at any time your status as a witness changes,  
 14 you will be notified. The attorneys who will be  
 15 interviewing you are Stephen Powell, Adina  
 16 Teodorescu, Sean Granat, and Aerial Cook.

17 As a commissioned notary public in the State  
 18 of Florida, I am authorized to administer oaths.  
 19 Please be advised that any false statements made  
 20 during your interview or attempts to obstruct the  
 21 Office of General Counsel's investigation may be  
 22 used in a subsequent prosecution against you.

23 If you'd please raise your right hand.  
 24 Do you, Walette Stanford, swear to tell the  
 25 truth, the whole truth, and nothing but the truth?

1 THE WITNESS: Yes.

2 MR. LINSNER: Have any promises, threats, or

3 inducements of any nature whatsoever been made by

4 me in order to obtain your consent to this

5 statement?

6 THE WITNESS: No.

7 MR. LINSNER: And do you understand that this

8 recorded interview will be subject to public

9 disclosure pursuant to the public records law and

10 other laws of the State of Florida?

11 THE WITNESS: Yes.

12 MR. LINSNER: Okay.

13 WALETTE STANFORD,

14 having been produced and first duly sworn as a witness,

15 testified as follows:

16 EXAMINATION

17 BY MR. POWELL:

18 Q Good afternoon, Ms. Stanford. Before we

19 begin, is it S-T-A-N-D or S-T-A-N ford?

20 A S-T-A-N-F-O-R-D, Stanford, like the college.

21 Q Thank you for coming over to visit with us

22 this afternoon. My name is Steve Powell, as we were

23 introduced before we began. I'm with the Office of

24 General Counsel. Sean Granat, Adina Teodorescu, and

25 Ariel Cook as well are with the office.

1 And you have brought company with you today.

2 Would you introduce her for our record?

3 THE WITNESS: Yes. Chris Schwing, my

4 attorney from Holland & Knight.

5 MR. POWELL: Thank you. And welcome, Chris.

6 MS. SCHWING: Good afternoon.

7 BY MR. POWELL:

8 Q I just want to establish the framework for

9 this so that you're clear on why we're here. And if

10 you have any questions before we begin, you can do

11 that.

12 This interview is being conducted in regard

13 to the assignment given to the Office of General

14 Counsel by the JEA board of directors on December 18th

15 to investigate the tenure of Aaron Zahn as CEO of JEA

16 to determine whether grounds exist to support the

17 termination of Mr. Zahn's employment contract for

18 cause.

19 We have been working on this for a couple of

20 weeks now and, over the course of that work, have

21 identified a number of areas of interest to us that we

22 would like to get more information about, and you have

23 fallen into one of those areas to some extent.

24 A Okay.

25 Q So all we ask today is that you do your best

1 to answer as completely as you can based on your

2 personal knowledge and observation of events that we

3 inquire into, and truthfully, of course.

4 A Yes.

5 Q If you have any questions to any question

6 that's put to you by any of us, that you don't

7 understand the question, please let us know, and we'll

8 be happy to clarify that. We don't want you answering

9 something thinking we're asking one thing and not the

10 other.

11 A Uh-huh.

12 Q So if you do give us an answer without asking

13 for any clarification, we will assume that you

14 understand the question. Is that agreeable?

15 A Yes.

16 Q All right. As I said, if along the way you

17 have any questions, let us know. I don't think we'll

18 be all that long, but if it goes beyond a point of

19 comfort for you, just let us know and we'll take a

20 break, take a walk, and visit with your attorney, or

21 run to the rest room.

22 If along the way you want to consult with

23 your attorney, just let us know and we'll -- it might

24 be easier if y'all stepped out, and we'll find a place

25 for you to have a conversation that's confidential and

1 address that and then come back in.

2 I think Mr. Granat is going to lead the

3 questioning. It's not going to be Mr. Granat, me

4 asking, Adina, then Ariel. It's going to be a bit of

5 a --

6 A Oh, okay. Good.

7 Q So you don't feel like we're going to go

8 through three or four rounds of this. We will

9 intersperse our questions as we go along, and we'll try

10 not to appear to be teaming up on you.

11 The only other caution -- and Chris, I'm

12 sure, would echo this -- please try to let us finish

13 our question before you come in with an answer. That's

14 really to help our court reporter in her work so that

15 she can keep the record straight.

16 As you know, in conversation we tend to talk

17 on top of one another, and that's not really ideal

18 here.

19 And, lastly, if you could answer audibly,

20 rather than with uh-huhs and huh-uhs, or nods and

21 shakes of the head, that, too, enables her to get the

22 record clear. Okay?

23 A Yes.

24 MR. POWELL: All right. Mr. Granat.

25 BY MR. GRANAT:

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1 Q So, Ms. Stanford, let me ask you first to  
2 tell us, what is your knowledge -- and just start  
3 generally -- about the Legacy Industries in relation to  
4 Mr. Zahn?  
5 A My knowledge. Well, I first heard about it  
6 in the newspaper. An article came out that Mr. Zahn  
7 owned Legacy Industries with Deno Hicks. And I read  
8 that in the newspaper, was my first knowledge of what  
9 Legacy Industries was.  
10 Q Okay.  
11 A And then I spoke to Mr. Zahn's attorney about  
12 Legacy Industries, and that's when I found out more  
13 about it, in addition to Mr. Zahn mentioning it to me  
14 as well.  
15 Q When you saw it in the newspaper, did you  
16 know what Legacy Industries was?  
17 A No. I had no idea.  
18 Q And when did you come to talk to Mr. Zahn's  
19 attorney about it?  
20 A Mr. Zahn called me on December the 12th and  
21 told me about Legacy Industries and his ownership of it  
22 and said that his attorney, named Jake Peek, would be  
23 calling me later to explain the situation to me.  
24 Q We have some emails, so maybe this will help.  
25 Let me pass --

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1 BY MR. POWELL:  
2 Q While he's doing that, let me also ask you,  
3 to help us with the chronology in terms of years -- I  
4 believe most of our focus here will be on the time  
5 frame spring of '18 to now.  
6 A Okay.  
7 Q Or actually to December of '19. So, as an  
8 example, you said December 12th. What year was that?  
9 A I'm sorry. 2019.  
10 Q Okay. Thank you very much. If you could  
11 keep that in mind as we go through, I'd appreciate it.  
12 A Yes.  
13 MR. POWELL: Thank you.  
14 BY MR. GRANAT:  
15 Q So hopefully what I've handed you has three  
16 pages. Is that a three-page document?  
17 A Yes.  
18 Q Okay. And the first is an email from you to  
19 Mr. Zahn dated December 13th, 2019?  
20 A Yes.  
21 Q All right. And so it says two memos that he  
22 asked you to document?  
23 A Yes.  
24 Q And when did he ask you to write these memos?  
25 A The day before, December 12th, 2019.

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1 Q Okay. So the -- was December 12th the first  
2 time that you looked into Legacy Industries at all  
3 other than seeing it in the paper?  
4 A Yes, sir.  
5 Q Okay. So tell me about your conversation  
6 with Mr. Zahn, please.  
7 A My conversation with Mr. Zahn was he called  
8 to explain to me that he did not believe that his  
9 ownership of Legacy LLC was categorized as secondary  
10 employment.  
11 And he asked me to contact -- told me that he  
12 would have his attorney contact me so that I could  
13 document what the Legacy LLC was and if it was -- that  
14 it was not secondary employment.  
15 I told him I could not document that it was  
16 not without investigating and looking into it, but I  
17 would be willing to speak with his attorney, and I  
18 could document the conversation that I have with his  
19 attorney and what his attorney tells me.  
20 Q Okay. Did -- when did Mr. Zahn ask you to  
21 document -- what was the date he asked you to  
22 document -- when was -- that's a bad -- let me try to  
23 rephrase this.  
24 Did he ask you what date to put down as the  
25 date he disclosed Legacy to you?

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1 A No, he did not.  
2 BY MR. POWELL:  
3 Q Before we go too much further, because other  
4 people might be reading this down the road, could you  
5 quickly summarize your position at JEA and what your  
6 duties and responsibilities are?  
7 A Sure. My title is ethics officer for JEA.  
8 I've held that position I believe eight years now.  
9 I've been with JEA for 16 years.  
10 And my duties include elevating the ethical  
11 culture at JEA. So I'm primarily responsible for our  
12 secondary employment disclosures, nepotism, gift  
13 policy. I handle exit interviews, anything involving  
14 the code of conduct around ethics for JEA. All the  
15 training goes through me for all those areas as well.  
16 MR. POWELL: Thank you.  
17 BY MR. GRANAT:  
18 Q So does -- the memo that's dated December  
19 12th, does that accurately describe your conversation  
20 with Aaron Zahn?  
21 MS. SCHWING: Which one are you wanting her  
22 to look at?  
23 THE WITNESS: Yeah.  
24 BY MR. GRANAT:  
25 Q Oh, they're both dated December 12.

1 A Yeah.

2 Q The first memo --

3 A The first one.

4 Q -- that says Memo for file - Family Trust.

5 A Yes. I wrote this memo.

6 Q Okay. And was there any other information

7 discussed with Mr. Zahn other than this?

8 A No.

9 Q And what did you do after you got the phone

10 call from Mr. Zahn?

11 A After I got the phone call from him, his

12 attorney called me. The first -- well, the first phone

13 call was at 10:00 a.m. on December 12th, 2019, and

14 that's when he told me that his attorney would be

15 calling me.

16 And then he called me about an hour later on

17 December 12, 2019.

18 Q The attorney?

19 A Aaron.

20 Q Oh, Aaron.

21 A Aaron called me back and asked if I could do

22 the memo. The first conversation was just to ask me to

23 talk to the attorney about Legacy Industries and the

24 makeup and the setup of it.

25 And then he called an hour later and asked if

1 I could do the memo -- do a memo to file once I've had

2 the conversation with his attorney.

3 His attorney called me on December 12th at

4 1:45 and said, Is this a good time to talk? I said no.

5 So we talked about scheduling a time to talk.

6 He called me back at 2:00 p.m., and we spoke

7 at that time on December 12, 2019.

8 Q And was it Jake Peek that you talked to?

9 A Jake Peek contact -- called me, yes.

10 Q And can you tell me about that conversation?

11 A Yes. Mr. Peek called me and began to explain

12 to me this makeup. He actually emailed this document

13 to me after our conversation.

14 And so he basically explained -- went through

15 this chart and said that Aaron Zahn and his father,

16 Fred Zahn, owned this company called GNOSIS Management

17 Group, LLC, it's a family trust, and that they own

18 Legacy Industries with Deno Hicks. Deno Hicks is 50

19 percent ownership, GNOSIS Management is the other 50

20 percent, and the two own Legacy Industries together.

21 And he said this family trust was not filed

22 correctly and that his paralegal put Aaron down as the

23 managing partner instead of Deno Hicks.

24 Q Of the family trust?

25 A No. Of Legacy.

1 Q Of Legacy.

2 A Because I believe the article in the paper

3 talked about Aaron being the managing partner of Legacy

4 Industries. And he said it actually was Deno Hicks,

5 and that his paralegal was going in to fix it, and

6 Aaron was not the owner -- managing partner, Deno was.

7 And that Aaron and his father owned this trust; Aaron

8 was not the primary responsible person for it, it was a

9 family trust, and that Legacy Industries owned the land

10 that was referenced in the newspaper.

11 Q Okay. And is that all the conversation you

12 had with Jake Peek?

13 A He went on to say, you know, this was a big

14 mistake. His law firm owned the responsibility and

15 that Aaron was not -- he was -- he was sorry that it

16 happened, and he wanted to help Aaron by trying to

17 explain to me that Aaron had -- Aaron was not the

18 managing partner for this organization.

19 Q Anything else?

20 A No.

21 (Exhibit Number 1 was marked for

22 identification.)

23 BY MR. GRANAT:

24 Q And then you wrote this second memo that's

25 titled Memo to File - Aaron Zahn, and it's dated

1 December 12th, 2019?

2 A Yes.

3 Q Okay. And you copied Ted Hobson with all of

4 these?

5 A Yes. Ted Hobson is my boss, so I copied him

6 on everything.

7 (Exhibit Number 2 was marked for

8 identification.)

9 BY MR. GRANAT:

10 Q So after you wrote this memo and had a

11 conversation with Mr. Peek, did you do anything else

12 regarding Legacy?

13 A Yes. After I wrote the memo, I called my

14 boss -- he was in Atlanta -- Ted Hobson. He was in

15 Atlanta on a business trip, and I asked him could I

16 investigate more into this information, because I felt

17 that I had to look into it because I was concerned

18 around secondary employment, that we have a policy at

19 JEA and Aaron is an employee, and so I felt like it may

20 be a violation, may or may not, but I didn't know

21 unless I looked into it. So I asked could I look into

22 this situation.

23 Q And what was the response?

24 A He said no.

25 Q Okay. Did he tell you why?

1 A No. He just said we'll talk about it later.  
 2 So I said okay.  
 3 Q Okay. Did you look into it at any point  
 4 after that?  
 5 A Yes. Aaron called me to --  
 6 Q Let me back up. Do you remember when the  
 7 date was that you called Ted Hobson and asked if you  
 8 could look into this?  
 9 A I believe it was the next day. It was  
 10 December the 13th at 8:00 a.m.  
 11 Q Okay. And is that the day that Ted Hobson  
 12 told you don't look into it?  
 13 A Correct.  
 14 Q And then when did Aaron call you after that?  
 15 A Aaron called me late -- probably right after  
 16 that and asked as a follow-up did I finish the memos?  
 17 And I said, I'm still working on them, but, yes, I  
 18 should have those done today.  
 19 He said, Okay.  
 20 And I said, But I really need to look into  
 21 this, Aaron.  
 22 He said, Well, do whatever you need to do.  
 23 So I took that as okay to start looking.  
 24 Q Did you start looking?  
 25 A I did.

1 Q Tell us what you did, please.  
 2 A The first thing I did was go into Sunbiz, I  
 3 believe, and start pulling up the information on this  
 4 Legacy Industries, GNOSIS Management, pretty much did a  
 5 Google search of as much as I could.  
 6 I did go and look to see when Aaron took his  
 7 ethics training. All employees are required to take  
 8 ethic training annually, so I looked to see when did he  
 9 take his training. And then I asked to get a copy of  
 10 his financial disclosure form, Form 1.  
 11 So I just started doing a normal  
 12 investigation that I normally would if I was looking  
 13 into a situation.  
 14 Q Did your investigation reveal any violations?  
 15 A Well, I don't have my notes in front of me,  
 16 but I believe I noticed that he did not have secondary  
 17 employment disclosed. He did not have a form. He did  
 18 not take the -- no, he did take the training. I'm  
 19 sorry, I think he did take the training. I don't have  
 20 my notes in front of me, so I don't have -- I turned  
 21 all that over, so I'm not sure.  
 22 Q Let me put -- well, let me just give it to  
 23 her.  
 24 (Off-the-record discussion)  
 25 BY MR. GRANAT:

1 Q Ms. Stanford, I'm just going to hand you this  
 2 notebook and ask you --  
 3 A Okay.  
 4 Q I know that you had prepared a notebook. Is  
 5 that the one you prepared, or is this different? Were  
 6 things added to it?  
 7 A It looks like the one I prepared, but, I  
 8 mean, I haven't had it, so I don't know if anything has  
 9 been added. But it looks very similar to the one I  
 10 prepared.  
 11 Q And when you said you didn't have your notes,  
 12 would that be your notes?  
 13 A These are my notes, yes. This has all the  
 14 information that I pulled to look into the  
 15 investigation.  
 16 Q So let me let you look through that, and take  
 17 all the time you need. Then I'll ask you the same  
 18 question: Did you find any violations for Mr. Zahn.  
 19 Please take your time?  
 20 A Well, the first one I found is right here in  
 21 the front. It's in his employment agreement. It  
 22 speaks to, Employees may not engage directly or  
 23 indirectly in any other business, investment, or  
 24 activity that interferes with employee's performance of  
 25 his duties and is directly contrary to JEA's interests,

1 or requires any significant portion of employee's  
 2 business time ... provided, however -- interests or  
 3 requires any significant portion of any employee's  
 4 business time ... provided employee may own less than 2  
 5 percent of the voting stock of a corporation listed for  
 6 trading.  
 7 So I highlighted that, because I wasn't  
 8 really sure that that may be an issue.  
 9 I then looked at -- okay. Can you repeat the  
 10 question, Shawn?  
 11 Q Yes. After you did your investigation, did  
 12 you find any policies that Mr. Zahn violated?  
 13 A Based on my investigation, I felt as though  
 14 Mr. Zahn had violated our secondary employment policy.  
 15 Two things: One, when he was hired back in April of  
 16 20 -- April 25th, 2018, he disclosed on his secondary  
 17 employment form that he did not engage in any secondary  
 18 employment. And the fact that now I see that he has  
 19 secondary employment, this GNOSIS Management, which is  
 20 tied into the Legacy Industries, that should have been  
 21 disclosed based on our secondary employment policy.  
 22 Q Is ownership in a company secondary  
 23 employment?  
 24 A Yes, it is.  
 25 Q What about just ownership of investment

Page 21

1 property?

2 A We changed our policy on November -- no, I'm  
3 sorry, September 4th of 2019, where passive ownership  
4 of investment policy (sic) did not require a secondary  
5 employment. But prior to that, it did.

6 Q And so Mr. Zahn should have disclosed his  
7 ownership in GNOSIS and Legacy Industries prior to the  
8 change in policy?

9 A Correct.

10 Q Did you notify anyone of that violation?

11 A Yes.

12 Q Who did you notify?

13 A I notified Office of General Counsel. I told  
14 Lynne Rhode and Miriam Hill. And I also told my boss,  
15 Ted Hobson, and I told April Green, the chair of JEA  
16 board.

17 Q Do you know if Mr. Zahn ever completed a  
18 secondary employment form?

19 A I did not find one.

20 Q Would you normally --

21 A Aside from the one he was hired. This is his  
22 original one from hire. That's the only one that I  
23 had.

24 Q So to your knowledge, has Mr. Zahn ever  
25 corrected his secondary employment form?

Page 22

1 A No, he has not.

2 Q Although if Legacy Industries is a passive  
3 real estate investment of his family trust, under the  
4 current policy would there be a need to disclose that  
5 under a secondary policy today?

6 A It would depend. I'd have to know more about  
7 this Legacy Industries. I haven't had a conversation  
8 with Mr. Zahn in detail about it.

9 Does it have a W-2? I mean I don't know what  
10 type of LLC it is. I was only told that the GNOSIS was  
11 a trust. But, again, I didn't investigate to that  
12 level to make that determination.

13 Q After you disclosed the secondary employment  
14 violation, did you conduct any other investigations?

15 A I did not.

16 Q Were you asked to continue or to not continue  
17 by anyone?

18 A I was asked to do neither, continue or not  
19 continue.

20 Q Okay. I'm going to pass out a second memo --  
21 email and memo. And this one is -- seems to be written  
22 by you on December 13, 2019. And it's titled Memo for  
23 file - Southern Group.

24 A Yes.

25 Q So can you tell us how this email and the

Page 23

1 attached memo came about?

2 A Yes. I received another call from Aaron Zahn  
3 on December 13, 2019. And I believe it occurred after  
4 a news article came out about Deno Hicks and the  
5 Southern Group, which is a lobbyist company. And he  
6 asked me to investigate and talk and find out about  
7 this Southern Group RFP that we had with JEA and asked  
8 me to do a memo to file once I looked into it.

9 Q So what did you do?

10 A So I spoke with Mr. Zahn, and I told him that  
11 I did talk to Sherry Hall, because she was the employee  
12 who was in charge of the RFP. I contacted the  
13 procurement office, got all the documents around the  
14 RFP with Southern Group.

15 And at the time, the RFP information I got  
16 from the procurement team, I spoke with a couple people  
17 on the team to make sure I had all the information, and  
18 then I also had a conversation with Sherry Hall in  
19 regards to it as well.

20 Q So did you find any irregularities with this  
21 procurement?

22 A Couple things came to mind. I can't say that  
23 they were an issue, but they were somewhat odd to me.

24 One was the timing of the RFP was handled  
25 fairly quickly. I mean I've been with the company 16

Page 24

1 years; I've never seen anything turn around that quick.  
2 So from the time it went out to the time it was secured  
3 was a very quick turnaround.

4 There was only one individual that reviewed  
5 it, and that was Sherry Hall, which I thought was  
6 somewhat odd. Usually it's two or three people -- or  
7 three, typically, for RFP. But I know this was not a  
8 large dollar amount RFP.

9 And then it was sent to, I believe, six or  
10 seven individuals, lobbyist companies, and only one  
11 responded. And I believe two of the six were the same  
12 firm, were Southern Group. So I thought that was kind  
13 of odd.

14 When asked, I was told that they used the  
15 same list that was provided from an RFP that JTA did  
16 for a lobbyist company, and that's how they secured the  
17 names of the lobbyists to send the RFP out for.

18 Having spoken to Sherry Hall, she mentioned  
19 that she did not know that Aaron and Deno Hicks had a  
20 business relationship together. She said they'd all  
21 been friends for many years, but she did not know that  
22 they had a business relationship together.

23 Q Do you know what the RFP was for, exactly  
24 what the service was?

25 A My understanding from Sherry Hall was Suzanne

1 Goss, an employee, retired -- I know because I did her  
2 exit interview; she retired from JEA. She was the  
3 governmental affairs person that handled a lot of our  
4 governmental issues in Tallahassee.

5 Instead of hiring another employee to replace  
6 her, Sherry was going to use a lobbyist company to fill  
7 that role in Tallahassee, and so that was the premise  
8 behind hiring the lobbyist group.

9 Q Do you know what the issue -- what the  
10 lobbyist was going to be used for, or why the urgency  
11 of this RFP?

12 A I do not. The only thing she told me around  
13 the urgency was that Suzanne was retiring and she  
14 needed someone to quickly fill that role.

15 Q Did you -- so you talked to Sherry Hall?

16 A I did talk to Sherry Hall.

17 Q Did you ask Sherry Hall directly if Aaron  
18 Zahn or anyone told her who to hire?

19 A I didn't ask her that question. She said  
20 that they went through the normal bid process. She  
21 worked closely with Jenny McCollum, who is the director  
22 of procurement.

23 Q Did you talk to Jenny McCollum?

24 A I did not. She was in Atlanta.

25 Q Okay. So did you talk to anyone else in

1 procurement?

2 A Heather Beard, I spoke with her in  
3 procurement. Actually, I was on the phone with Heather  
4 when --

5 Q Beard?

6 A I believe that's Heather's last name, Beard,  
7 B-E-A-R-D. I believe that's it.

8 I was actually on the phone with Heather and  
9 she said she just hung up with Jenny because Southern  
10 Group was sending a letter to say they no longer wanted  
11 to do business with us.

12 BY MR. POWELL:

13 Q When was that?

14 A It was, I believe, December 13th. I was on  
15 the phone with her when all this was like transpiring.  
16 Of 2019.

17 Q Do you recall how much time the RFP allowed  
18 for groups to respond to it?

19 A I do not. I printed all the documents, but I  
20 didn't get into all of that detail of the timeline.

21 Q When you talked to Sherry Hall, did I  
22 understand you to say that she told you that she and  
23 Aaron Zahn had been friends for many years?

24 A She did. She told me her, Aaron, and Deno  
25 had been friends for many years. But she did not know

1 that they had a business relationship.

2 Q Did she offer any additional information  
3 about her relationship with Mr. Zahn and Mr. Hicks over  
4 those years?

5 A She did not.

6 Q When you first contacted Mr. Peek --

7 A I didn't contact him. He contacted me.

8 Q He contacted you, I'm sorry. Did you provide  
9 him with at any point JEA's secondary employment policy  
10 in your back-and-forth with him?

11 A I did. He asked for a copy, and I did send  
12 it to him.

13 Q Before you sent it to him, did he offer any  
14 explanation to you of the structure of Legacy and  
15 whether Mr. Zahn was properly named as the managing  
16 partner?

17 A He explained to me that in his mind this was  
18 more passive ownership for Aaron, that he -- it was a  
19 family trust. Aaron was not actively engaged in it and  
20 that it was more of a family-trust-type business  
21 scenario, and that Aaron really was removed -- based on  
22 our conversation, I sensed that he was explaining to me  
23 that he was not actively involved. He was not the  
24 managing partner; he was just more of a passive owner.

25 Q The managing partner of GNOSIS?

1 A Correct. And Legacy. Because he said Legacy  
2 was -- Deno Hicks was the managing partner.

3 Q Did he affirm to you that Mr. Hicks was the  
4 managing partner before you sent JEA's secondary  
5 policy --

6 A Yes.

7 Q -- do you know?

8 A Yes. He told me that before -- he told me  
9 that the day -- I believe it was December the 12th,  
10 2019, when everything hit the paper. That's -- because  
11 the paper, I think, explained that Aaron was the  
12 managing partner, and he said, No, that was done in  
13 error. My paralegal has fixed that now.

14 And when I went in Sunbiz, it was changed. I  
15 did verify that. But he said Deno Hicks was the  
16 managing partner.

17 Q At any time before he offered this  
18 explanation of the paralegal error, did he represent to  
19 you or affirm to you that Mr. Zahn was, in fact, the  
20 managing partner of Legacy?

21 A No. He never affirmed that he was the --  
22 that Mr. Zahn was the managing partner, no. He never  
23 stated that.

24 BY MR. GRANAT:

25 Q Regarding the procurement of Southern Group,

1 did you come to any conclusions after looking into it,  
2 other than what you've already told us?

3 A No. I had no -- no other conclusion.

4 Q Did you find any procurement violations? I  
5 know you told us some questions.

6 A Yeah, I wasn't -- I'm not that familiar with  
7 procurement violations, so I didn't -- that's not  
8 really in my wheelhouse, so I basically assumed it was  
9 done properly.

10 I did speak to Heather Beard, who is one of  
11 the managers in procurement, and asked her was  
12 everything done correctly. And she said based on what  
13 she saw, it looked fine.

14 But I just found that kind of odd, like I  
15 said, myself, but ...

16 Q You said earlier that you conducted an exit  
17 interview of someone?

18 A Yes. Suzanne Goss.

19 Q Is that something that you regularly do, exit  
20 interviews?

21 A Yes. I do them for all employees that resign  
22 or retire, as long as it's not for cause.

23 Q And what's the purpose of those?

24 A It's a way to gather an understanding around  
25 the culture, to see from a standpoint how our

1 organization kind of lines up, or are there things we  
2 should do for improvement, to making sure that we don't  
3 have any managers that may be mistreating employees.

4 So we do all those for all of our retirees  
5 and resignations. If someone leaves -- let's say they  
6 come in, they put their notice in that day, I will mail  
7 it to their home and then see if I get a response back  
8 and offer to do them over the phone, or sometimes I get  
9 them back in the mail.

10 Q Do you find that you get good -- what appears  
11 to be honest critique?

12 A I think I do.

13 Q Do you recall a former employee named Scott  
14 Strackbine?

15 A Yes.

16 Q Did you conduct an exit interview with him?

17 A I did.

18 Q Was it verbal or in writing?

19 A It was in person.

20 Q In person. Can you tell us about that,  
21 please?

22 A Sure. I don't know if I put that in here. I  
23 don't think I have a copy of it with me.

24 But what I do recall is Scott stated he  
25 enjoyed his short time at JEA for the most part. He

1 was leaving the organization because he did not respect  
2 the senior leadership team.

3 He -- Scott was a compensation specialist, a  
4 senior compensation specialist, and he felt the senior  
5 leadership team did not respect his subject matter  
6 expertise as it related to compensation. He felt they  
7 were very disrespectful, and he no longer wanted to be  
8 part of an organization that didn't value the  
9 employee's knowledge of the subject matter in their  
10 expertise.

11 Q Can you tell us, if you know, generally what  
12 a compensation specialist does?

13 A Yes. I used to work in HR so -- I was  
14 actually there when they hired Scott. Scott's position  
15 as a compensation specialist is responsible for all  
16 compensation for all employees, so they make  
17 recommendations on salaries, they use benchmarking  
18 data. Anytime we do pay for performance or salary  
19 increases, they do all of the -- provide all the data  
20 for negotiations with the bargaining units, and look in  
21 the marketplace to see where we are based on where the  
22 market is for various job -- for all the positions  
23 within JEA. So, yes, he -- and he was a senior  
24 compensation specialist.

25 Q Was Mr. Strackbine specific with you about

1 any disagreements he had with the senior leadership  
2 team?

3 A He wasn't specific. He just said as a whole  
4 they were not respectful and he didn't agree with some  
5 of their concepts, and he just seemed to me like he was  
6 very disgusted.

7 Q Did -- are you familiar with what's  
8 referenced as the PUP?

9 A Just what I have read in the paper.

10 Q Okay. Did you ever have a conversation with  
11 Mr. Strackbine about the PUP?

12 A No, I did not.

13 BY MR. POWELL:

14 Q How long had Mr. Strackbine been with JEA?

15 A I don't know for sure. I want to say maybe  
16 two, three years. I'd have to look it up.

17 MR. GRANAT: Can we take a quick break?

18 (Recess from 3:49 p.m. to 3:57 p.m.)

19 BY MR. GRANAT:

20 Q Ms. Stanford, did you take notes of your  
21 interview -- exit interview with Mr. Strackbine?

22 A Yes.

23 Q Do you have those somewhere?

24 A Yes.

25 Q Did you also -- let's go off the record for a

1 minute, please.  
 2 (Off-the-record discussion)  
 3 BY MR. GRANAT:  
 4 Q Ms. Stanford, would you be willing to find  
 5 those notes and get them to me?  
 6 A Yes.  
 7 Q And if I have additional questions based on  
 8 those, could we reconvene at another time if we needed  
 9 to talk about those?  
 10 A Yes.  
 11 Q Would that be okay?  
 12 A Yes.  
 13 MR. GRANAT: Okay. So I -- I'm going to let  
 14 my colleagues ask more questions.  
 15 BY MS. COOK:  
 16 Q Yeah, I just had a couple follow-up questions  
 17 on the exit interview stuff.  
 18 A Sure.  
 19 Q So it makes sense to me why that would fall  
 20 under your purview, as you explained it. Let's say you  
 21 have an exit interview with someone and they voice  
 22 reasons for leaving or general concerns that you think  
 23 are worth addressing.  
 24 What authority or permissions do you have to  
 25 do anything to follow up on those concerns? Does that

1 make sense?  
 2 A Yes.  
 3 Q Okay.  
 4 A I have authority to follow up on them.  
 5 Typically, if I hear something that's shocking or  
 6 someone says they saw something that was in violation  
 7 of one of our policies, I would contact the senior  
 8 leadership team member of that individual and report it  
 9 to them.  
 10 Q Okay. And what about in the case of  
 11 Mr. Strackbine -- am I saying that right?  
 12 A Yes.  
 13 Q If his complaint is about the senior  
 14 leadership team, who do you take that to?  
 15 A To the chief human resource officer would  
 16 have been first person, and Ted Hobson, my boss.  
 17 Q Okay. And did you think anything that  
 18 Mr. Strackbine said rose to the level that required you  
 19 to follow up on it?  
 20 A No, because I didn't have any specifics.  
 21 However, I did mention it to my boss, Ted Hobson.  
 22 Q Tell me about that conversation.  
 23 A I told him pretty much what Mr. Strackbine  
 24 stated, and that I was somewhat shocked to hear that  
 25 his -- how upset he was, because I thought he was a

1 very good employee and didn't really want to leave but  
 2 felt like he was not comfortable working at JEA any  
 3 longer.  
 4 Q Generally speaking, what input would this --  
 5 I'm trying to understand, because you explained his job  
 6 as like basically he's making recommendations for  
 7 salaries, coming up with comp figures, stuff like that.  
 8 A Uh-huh.  
 9 Q What interaction would he be having with the  
 10 senior leadership team to create this kind of conflict?  
 11 A Well, prior to me leaving J -- I mean HR,  
 12 human resources, someone at his level would meet with  
 13 any employee. Anytime a new job description was being  
 14 created, he would meet with the hiring manager. So any  
 15 time job offers were made, he would meet with them.  
 16 So my assumption is that maybe he interacted  
 17 with them when new employees were hired and they were  
 18 talking about salaries and maybe some conversations  
 19 came up in that sense.  
 20 Q Okay.  
 21 A So that's -- that's kind of what I took it  
 22 as.  
 23 Q Okay.  
 24 A And he'd been doing that work for many years,  
 25 so he was very well respected.

1 Q And would he have had any input into the  
 2 salaries for the senior leadership team or only for the  
 3 people under them?  
 4 A Typically the compensation specialist is  
 5 involved with all salaries, discussions for all  
 6 employees, including senior leadership team.  
 7 Q But he didn't have any specific issues  
 8 with --  
 9 A He didn't tell me any specific issues.  
 10 Q -- so-and-so is getting a crazy bonus or  
 11 so-and-so --  
 12 A Correct.  
 13 Q -- is getting way underpaid?  
 14 A He works on employment contracts. He works  
 15 on all job descriptions, as far as I know.  
 16 MS. COOK: Okay. Thank you.  
 17 BY MR. POWELL:  
 18 Q Do you know whether Mr. Strackbine worked on  
 19 the employment agreements that were approved by the  
 20 board of directors on July 23?  
 21 A I do not.  
 22 Q Did he indicate to you when his unhappiness  
 23 began?  
 24 A He did not.  
 25 BY MS. COOK:

1 Q Oh, sorry, one other question. Did he talk  
2 anything about Zahn specifically?

3 A He did not. He did not name any specific  
4 senior leadership team member.

5 MR. GRANAT: Let's wait until we get the  
6 notes before we ask --

7 MS. COOK: I'm done.

8 MR. GRANAT: -- for more information.

9 BY MR. POWELL:

10 Q Okay, I'll move off Mr. Strackbine.

11 A Okay.

12 Q You indicated that on September 4th of '19  
13 the policy changed, I think I understood you to say, so  
14 that if you had passive employment you didn't need to  
15 disclose that. Did I get that right?

16 A Passive property, rental property. It was  
17 two changes made at that time. One was from passive  
18 ownership of property -- for example, if your parents  
19 owned a home, they passed away, they left the home to  
20 you, you rented it out to your cousin to live in, that  
21 would be passive rental agreement, so that no longer  
22 needed to be disclosed as secondary employment.

23 Q All right.

24 A The other change I made was clarifying for  
25 nonprofits. If you were on a nonprofit board that you

1 did not have to disclose secondary employment if you  
2 received no funds as being on that board.

3 And then, lastly, military, there were  
4 questions in the past, if you were on the reserves did  
5 you have to disclose that as secondary employment, and  
6 we clarified that in the policy. So those were the  
7 only three changes that were made in the policy in  
8 September of 2019.

9 Q Am I understanding you to say, then, that as  
10 we understand Mr. Zahn's passive interest in Legacy  
11 through his family trust, that that ownership, that  
12 interest, would still need to be disclosed as secondary  
13 employment?

14 A I believe, based on my knowledge, yes.

15 Q So the policy change would not have impacted  
16 any of the Aaron Zahn/Legacy/GNOSIS issues that we're  
17 talking about here today?

18 A Correct.

19 Q When Mr. Zahn first reached out to you on  
20 this issue on December 12th -- and that's the first  
21 time you'd had any conversation with him about Legacy;  
22 correct?

23 A Correct.

24 Q Did he at any time indicate to you that he  
25 owned Legacy?

1 A Yes. He said he -- his family trust owned  
2 Legacy.

3 Q Did he at any time indicate to you that he  
4 was the managing partner of Legacy?

5 A He stated he was not.

6 Q But he did acknowledge that his family trust  
7 had an ownership interest in Legacy?

8 A Yes.

9 Yes. I don't know if I said that loud  
10 enough. Yes.

11 MR. GRANAT: Adina?

12 BY MS. TEODORESCU:

13 Q Are you familiar with Project Scampi?

14 A Yes.

15 Q What was it, or what is it?

16 A My understanding of Project Scampi was a way  
17 for us to capture information for the ITN.

18 Q Why was there a need for a -- was it a code  
19 name?

20 A I have no idea. I never asked. I was just  
21 told that we were going to download information into a  
22 system, and it would be called Project Scampi, and it  
23 would be part of the ITN.

24 Q Did you look at any of the documents that  
25 were downloaded?

1 A A few of them, yes.

2 Q Which ones, do you remember?

3 A I downloaded the ones for all of compliance,  
4 so for Ted Hobson's team; I downloaded all of those in  
5 the system.

6 So I didn't read them line by line because it  
7 was thousands of pages, but I got the information and  
8 downloaded it in the system.

9 Q And who was going to review them?

10 A My understanding, the bidders.

11 MS. TEODORESCU: Okay.

12 BY MR. POWELL:

13 Q Do you remember when that moniker, Project  
14 Scampi, first came into your reality?

15 A I would say sometime probably the summer of  
16 2019.

17 Q Did you ever know of Project Scampi by any  
18 other name?

19 A No.

20 Q Have you ever heard of anything called  
21 Project Freebird?

22 A No.

23 BY MS. COOK:

24 Q Earlier when you were going through the  
25 notebook and looking at your notes, you were looking

1 for something and then you said: It's not in here.  
 2 What were you looking for?  
 3 A Scott Strackbine -- Strack -- I can't talk.  
 4 Scott's contact information. I thought maybe I had his  
 5 exit interview, a copy of it in my notebook. I didn't  
 6 see it in there.  
 7 MR. GRANAT: Okay. I don't have any other  
 8 questions.  
 9 BY MR. POWELL:  
 10 Q All right. It appears that we may be talking  
 11 to you again, but in the event that we don't, I do want  
 12 to ask this concluding question. And before I do, I  
 13 want to make it clear to you that as you're speaking to  
 14 us, you are literally speaking to the board of  
 15 directors.  
 16 A Okay.  
 17 Q Is that understood?  
 18 A Yes.  
 19 Q So with that in mind and with your -- whether  
 20 it has anything to do with what we talked about today  
 21 or otherwise, are you aware of any other information  
 22 that you have that you want to bring to our attention  
 23 that would bear on the issue of whether Mr. Zahn's  
 24 employment, his performance, his conduct, his  
 25 management of JEA, was conducted in a manner such that

1 there are grounds to terminate his contract for cause?  
 2 And by cause, let me qualify that. That  
 3 would include anything that would fall into the  
 4 category of willful misconduct, gross negligence, or  
 5 misappropriation of funds, or any manner or form of  
 6 fraud.  
 7 A I'm not aware of anything, no. I don't have  
 8 anything else.  
 9 Q Thank you very much for your time today.  
 10 A You are welcome.  
 11 MR. POWELL: Our friend from OIG --  
 12 THE WITNESS: All these acronyms.  
 13 MR. POWELL: -- will wrap this up for us.  
 14 MR. LINSNER: Is there anything else you  
 15 would like to offer or add, Ms. Stanford?  
 16 THE WITNESS: No.  
 17 MR. LINSNER: As this is an ongoing Office of  
 18 General Counsel investigation, please be advised  
 19 not to discuss the case with others.  
 20 And the interview has now concluded. It's  
 21 4:10 p.m.  
 22 (Sworn statement concluded at 4:10 p.m.)  
 23 - - -  
 24  
 25

1 CERTIFICATE  
 2 STATE OF FLORIDA )  
 3 COUNTY OF DUVAL )  
 4 I, Marianne Branson, RPR, FPR, do hereby  
 5 certify that I was authorized to and did report the  
 6 foregoing proceedings, and that the transcript, pages 1  
 7 through 43, is a true record of my stenographic notes.  
 8 I further certify that I am not a relative,  
 9 employee, attorney, or counsel of any of the parties,  
 10 nor am I a relative or employee of any of the parties'  
 11 attorney or counsel connected with the action, nor am I  
 12 financially interested in the action.  
 13 Dated this 15th day of January, 2020.  
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*Marianne Branson*  
 Marianne Branson, RPR-CP  
 Court Reporter



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**From:** [Stanford, Walette M. - Director Emerging Workforce Strategies](#)  
**To:** [Zahn, Aaron F. - Managing Director/CEO](#)  
**Cc:** [Hobson, Ted E. - VP & Chief Compliance Officer](#)  
**Subject:** Memos  
**Date:** Friday, December 13, 2019 11:20:07 AM  
**Attachments:** [Memo for LLC Legacy Industry of Jacksonville.doc](#)  
[Memo for file - Family Trust.doc](#)

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Good Morning Aaron,

Attached are two of the memos you asked me to document our conversations yesterday. I put them in draft form in case you have suggested changes to ensure accuracy. Thanks

The other two memos will be sent today once I get additional documents from staff

**Walette Stanford**

Ethics Officer

Direct: (904) 665-4282

Mobile: (904) 710-1788





To: Memo to File – Family Trust –A. Zahn

FROM: Walette Stanford  
Ethics Officer

DATE: December 12, 2019

CC: Ted Hobson, Chief Compliance Officer

Based on my conversation with Aaron today, I was informed his family has a Trust. In the Trust, there are various assets. Aaron has no authority or fiduciary responsibility for the Trust. Aaron stated the Family Trust was disclosed when he accepted the interim managing director/chief executive officer position at JEA in May 2018.



To: Memo to File – Aaron Zahn

FROM: Walette Stanford  
Ethics Officer

DATE: December 12, 2019

CC: Ted Hobson, Chief Compliance Officer

Based on my conversation with Aaron and his Attorney, Jacob Peek today, I understand that an administrative error occurred while processing paperwork for Legacy Industries of JAX, LLC. The annual corporate maintenance paperwork for the company was not completed due to an office relocation. Therefore, the Secretary of State dissolved the company. When the paralegal went to rectify the problem, she inadvertently put Aaron Zahn as the managing partner instead of Deno Hicks. As of this afternoon, I was informed the error has been corrected. Aaron Zahn is not the managing member for Legacy Industries of JAX, LLC it is Deno Hicks. I was able to validate this information based on SunBiz records and a conversation I had with Jacob R. Peek of Peek & Miska counselors at law.

**From:** Stanford, Walette M. - Director Emerging Workforce Strategies  
**To:** Zahn, Aaron F. - Managing Director/CEO  
**Cc:** Hobson, Ted E. - VP & Chief Compliance Officer  
**Subject:** Memo for file - Southern Group  
**Date:** Friday, December 13, 2019 12:15:21 PM  
**Attachments:** Memo for file - Southern Group.doc

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Hi Aaron,

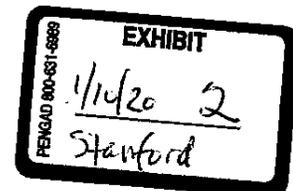
Attached is the memo to file for the Southern Group you requested. I put it in draft form to make sure I captured the facts correctly based on our conversation. Thanks

**Walette Stanford**

Ethics Officer

Direct: (904) 665-4282

Mobile: (904) 710-1788





To: Memo to File – The Southern Group

FROM: Walette Stanford  
Ethics Officer

DATE: December 13, 2019

CC: Ted Hobson, Chief Compliance Officer

Aaron Zahn stated to me on December 12 he had nothing to do with the procurement of The Southern Group. He told me to contact Sherry Hall, VP & Chief Government Affairs officer. On December 13, I spoke to Sherry Hall who procured the group when a retirement occurred in her group. She stated it was a competitive RFP done by Jenny McCollum's team in procurement services. There was only one respondent, which was The Southern Group. A list of companies were sent the RFP per Sherry. This all took place in the October 2019 timeframe. The Southern Group, managed in Jacksonville by Deno Hicks was awarded the contract with JEA and started in November 2019.