

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF FLORIDA
PENSACOLA DIVISION

COPY

DAVID LOUIS KRIKA,

Plaintiff,

v.

Case No. 3:16-cv-265-RV-CJK

CITY OF DEFUNIAK SPRINGS, FLORIDA,
a Florida municipal corporation;
DEFUNIAK SPRINGS CITY MARSHAL
MARK WEEKS, in his official capacity
and in his individual capacity;
DEFUNIAK SPRINGS POLICE CAPTAIN
MICHAEL LOLLEY, in his official and in
his individual capacity,

Defendants.

DEPOSITION OF:

CECILIA JONES

OCTOBER 20, 2016

The Deposition of CECILIA JONES, taken by the attorney for the Plaintiff, commencing at 9:20 a.m., on the 20th day of October, 2016, at the Walton County Courthouse, 571 U.S. Highway 90 East, Room 315, DeFuniak Springs, Florida, before Sharon L. Payne, Registered Professional Reporter and Notary Public at Large, in and for the State of Florida.

APPEARANCES:

ON BEHALF OF THE PLAINTIFF:

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ON BEHALF OF CECILIA JONES:

GARY ALLEN SHIPMAN, ESQUIRE
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ALSO PRESENT:

David Krika
Mark Weeks
Michael Lolley

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1 WHEREUPON,

2 CECILIA JONES

3 was called as a witness, and after having been first duly
4 sworn, was deposed and testified as follows:

5 DIRECT EXAMINATION

6 BY MR. WEBSTER:

7 Q. Good morning, ma'am.

8 A. Good morning.

9 Q. Would you please state your name and spell your
10 name for the record?

11 A. Cecilia Jones, C-E-C-I-L-I-A, Jones, J-O-N-E-S.

12 Q. Ms. Jones, have you ever had your deposition
13 taken?

14 A. Yes, not many times.

15 Q. Good for you. So you're familiar with the ground
16 rules, but I will kind of go over them here a little bit.

17 The court reporter is trying to type down what I
18 say and what you say. I will do my best not to speak over
19 you. I would ask that you do the same thing for me because
20 it will make her life easier, okay?

21 A. Uh-huh.

22 Q. Okay?

23 A. Yes, yes.

24 Q. If you can, please try to answer with yes or no
25 as opposed to uh-huhs or huh-uhs because they don't

1 translate well.

2 A. Okay.

3 Q. If you don't understand the question, don't
4 hesitate to ask that I rephrase the question, okay?

5 A. Okay.

6 Q. Ms. Jones, what's your profession?

7 A. Right now I'm a county commissioner.

8 Q. How long have you been a county commissioner?

9 A. This is my second term. Six years.

10 Q. When were you first elected to the County
11 Commission?

12 A. 2012, I think.

13 MR. SHIPMAN: We're in 2016. She had a gap
14 between her --

15 THE WITNESS: I am so bad with numbers. Just a
16 second.

17 MR. WEBSTER: It's not critical anyway.

18 MR. SHIPMAN: Cecilia, I think you were elected
19 in 2014.

20 THE WITNESS: I wrote it down last night. Wait
21 a minute.

22 MR. SHIPMAN: And you were, between 2008 and
23 2012, a commissioner.

24 THE WITNESS: Yes, 2008 to 2012 I was a
25 commissioner. I took a two-year break, and then now,

1 two years now.

2 Q. (BY MR. WEBSTER) So 2008 through 2012 you were a
3 county commissioner?

4 A. Yes.

5 Q. And then there was a two-year break and you ran
6 again?

7 A. Up here in the north end.

8 Q. So from 2008 to 2012 you were a county
9 commissioner for the south end of Walton County?

10 A. I was.

11 MR. SHIPMAN: We have five districts, so it's
12 not -- she didn't represent the entire north end or the
13 entire south end.

14 MR. WEBSTER: Okay. Just for general
15 geographical purposes.

16 Q. (BY MR. WEBSTER) And then in 2012 or 2014 --
17 2014, you got elected into one of the northern districts?

18 A. Yes.

19 Q. Do you know a man by the name of Dewey Wilson?

20 A. Yes.

21 Q. How do you know Dewey?

22 A. He started -- I assume he started the water
23 company in the south end.

24 Q. You say you assume?

25 A. Well, there might have been somebody that started

1 it, but I know he worked at the water system in the south
2 end.

3 Q. When you say water system, what does that mean,
4 ma'am?

5 A. Regional Utilities. It's also Zane Sunday's
6 brother-in-law.

7 Q. Zane Sunday?

8 A. Uh-huh.

9 Q. And how long have you known Mr. Wilson?

10 A. I'm from here, so gosh, I don't know, 30 years.
11 I was in the teaching background, so I wasn't into the
12 community too much. When I became a commissioner, you get
13 to know these people.

14 Q. Right. Were you friends with him before you ran,
15 or acquaintances? How would you describe your relationship
16 with Dewey --

17 A. Acquaintances. I know him. We're not friends.

18 Q. And Zane Sunday, who is he?

19 A. He used to be superintendent.

20 Q. Of schools?

21 A. Of Walton County, uh-huh.

22 Q. You said you had a teaching background?

23 A. Yes.

24 Q. Were you closer with Mr. Sunday? Did you have a
25 relationship with Mr. Sunday?

1 A. Uh-huh.

2 Q. Yes?

3 A. Yes.

4 Q. And did Mr. Sunday introduce you to Mr. Wilson?

5 A. No.

6 Q. Did Mr. Sunday help you campaign for county
7 commissioner?

8 A. No.

9 Q. Did he network you with any of his supporters?

10 A. No.

11 Q. Did Dewey Wilson, did he support you in your run
12 for county commissioner?

13 A. I hope so. I don't know.

14 Q. Do you recall him donating any money to your
15 campaign?

16 A. No.

17 Q. Did Regional Utilities donate any money?

18 A. No.

19 Q. At any point did you receive a
20 ten-thousand-dollar check from Mr. Wilson?

21 A. No. I wish I had.

22 Q. Do you recall -- how much of your personal money
23 did you donate to your campaign in 2009?

24 MR. SCHARLEPP: Form.

25 A. I don't remember. Whatever it took to win. I

1 don't remember. It's public record. I would have to look
2 at them.

3 Q. Fifty thousand dollars?

4 A. Listen, I ran three times --

5 MR. SCHARLEPP: Asked and answered.

6 THE WITNESS: I ran three times. My husband ran
7 two times. I've been involved in every race along the
8 way. I don't remember. I don't remember how much I
9 put in. You want me to look it up on my iPad? It's
10 public record.

11 MR. SHIPMAN: Cecilia, you don't have to guess.
12 If you don't know, that's all you've got to say.

13 Q. (BY MR. WEBSTER) Fifty thousand dollars? Less
14 than that do you think?

15 A. The first time I ran?

16 Q. Yes, ma'am.

17 A. Probably less than 50. No, I remember, it was
18 thirty thousand because I thought I worked the first year
19 free.

20 Q. Okay. Is that approximately what the salary
21 would have been as a county commissioner, thirty thousand?

22 A. Plus mileage, yes.

23 Q. And you said you've ran twice and your husband
24 has ran twice?

25 A. I think three times with him. He was on the

1 school board.

2 Q. And the \$30,000 that you donated to your
3 campaign, would that have come from your bank? Did you have
4 any cash laying around the house that you donated to your
5 campaign?

6 A. No, I think I took it out of my drop money when I
7 retired, the second time. The first time I took it out of
8 personal money, the bank.

9 Q. But it wouldn't have been under your mattress or
10 anything like that, cash under your mattress? It would have
11 been --

12 A. I wish, but no.

13 Q. -- out of your bank account? Okay.

14 At any point were you interviewed by anybody with
15 the DeFuniak Springs Police Department about any campaign
16 contributions?

17 A. No.

18 Q. To the extent that -- when you were representing
19 this southern district or this other district in Walton
20 County, one of the southern districts, did you maintain an
21 office in DeFuniak Springs?

22 A. No.

23 Q. Did you ever meet with Dewey Wilson in DeFuniak
24 Springs?

25 A. No.

1 Q. Did you ever receive any campaign contributions,
2 large campaign contributions in DeFuniak Springs?

3 MR. SCHARLEPP: Form.

4 A. I don't remember.

5 Q. (BY MR. WEBSTER) Did Detective Bart Smith ever
6 call you?

7 A. Who?

8 Q. Detective Bart Smith with the DeFuniak Springs
9 Police Department?

10 A. No.

11 Q. Did anybody with the FBI ever contact you?

12 A. My first term the FBI asked for some documents
13 that was in the D5 office, some public records. I can't
14 remember if I ever saw an investigator, but we were
15 subpoenaed. And I also had to get the past commissioner,
16 Commissioner Meadows' public records as well. We kept those
17 in a room, so we got both of those public records for the
18 FBI.

19 Q. So the FBI subpoenaed some records?

20 A. Yes.

21 Q. From Walton?

22 A. Yes.

23 MR. SHIPMAN: Walton County.

24 MR. WEBSTER: Walton County.

25 Q. (BY MR. WEBSTER) Was it directed to you or just

1 to Walton County in general, the subpoena?

2 A. Just documents through my office. And I can't
3 remember exactly what they were asking for, but I'm sure it
4 was toward Walton County.

5 Q. When was that, ma'am, that subpoena?

6 A. In my first term.

7 Q. Which would have been between 2008 and 2012?

8 A. Yes.

9 Q. Were you campaigning in 2011?

10 A. No, 2008, and then -- you campaign the whole four
11 years you are commissioner.

12 Q. But you took time off between '12 and '14?

13 A. Yes.

14 Q. Did you have any -- towards 2011, 2012, did you
15 have any inclination that you were going to run again or at
16 that point -- when did you decide not to run?

17 A. I didn't decide not to run. I got beat in a very
18 close race.

19 Q. So the two-year gap was -- it was a contested
20 election?

21 A. Yes.

22 Q. At any point were you interviewed by the FBI?

23 A. No. Not that I remember, no.

24 Q. Do you think you would have a hard time
25 remembering that?

1 A. No, I have not been interviewed by the FBI.

2 Q. Have you ever spoken to an FBI agent by the name
3 of Jamie Van Pelt?

4 A. I've heard his name on social media, but not --
5 no.

6 Q. He's never spoken to you?

7 A. No.

8 Q. At any point did anybody with the Ethics
9 Commission or Florida Campaign Commission, did anybody ever
10 come talk to you about any contributions or anomalies with
11 your contributions?

12 A. No.

13 Q. You've never been investigated, to your
14 knowledge, in that respect?

15 A. No.

16 Q. And DeFuniak Springs has never opened up a
17 criminal investigation into you that you're aware of,
18 correct?

19 A. This last election I had a crazy happen. I don't
20 know if they ever did an investigation. It was really
21 crazy.

22 Q. What was that?

23 A. This last election I would go and pick up a bunch
24 of signs at Ponce De Leon and we put the whole truckload of
25 signs in my truck. And this crazy lady contacted my --

1 someone called and said that she was looking for a "Phony
2 Tony" sign that was in my truck that I had confiscated from
3 DOT.

4 So I just took my truck down to the city police
5 and I said, here's my truck. I'm going to sit in the cab
6 while you go through and look for that lady's sign, or if
7 you would prefer, I would take it over to her house and dump
8 it in her front yard and she can look for her sign.

9 This county just has some conspiracy people in
10 it.

11 MR. SHIPMAN: Cecilia --

12 THE WITNESS: I know. Okay. Okay.

13 MR. SHIPMAN: The question was --

14 THE WITNESS: Okay, I don't --

15 MR. SHIPMAN: -- have you ever been investigated
16 by the DeFuniak police to your knowledge?

17 THE WITNESS: I guess that was an investigation
18 about she was looking for a phony sign.

19 Q. (BY MR. WEBSTER) You said Phony Tony?

20 A. Yeah.

21 Q. Who is that?

22 A. He was running for office and these nuts made
23 these signs that said "Phony Tony."

24 MR. SHIPMAN: Cecilia --

25 THE WITNESS: Okay. I will.

1 MR. SHIPMAN: The question was --

2 MR. WEBSTER: Hey, I mean, no offense to you,
3 but you're not going to testify for her. I'm asking
4 the questions.

5 MR. SHIPMAN: I'm trying to get her to stay on
6 focus.

7 MR. WEBSTER: Well, that's my job.

8 THE WITNESS: I will stay on focus.

9 MR. SHIPMAN: I will -- you can -- whatever you
10 want, but --

11 MR. WEBSTER: You can't tell her how to answer
12 questions, Mr. Shipman.

13 MR. SHIPMAN: I'm not telling her how to answer
14 the question.

15 MR. WEBSTER: I've been tolerant, but my
16 patience is waning in that respect.

17 MR. SHIPMAN: Well, you can just be impatient.

18 MR. WEBSTER: Well, then we'll sit here all day.

19 MR. SHIPMAN: Cecilia --

20 THE WITNESS: I'm listening to you. Go ahead.

21 MR. SHIPMAN: Cecilia, you need to pay attention
22 to the question.

23 THE WITNESS: Yes, sir. I just want to tell --

24 MR. SHIPMAN: Cecilia --

25 THE WITNESS: I know, I know, I know. Okay.

1 MR. SHIPMAN: Please pay attention to the
2 question.

3 THE WITNESS: Yes, sir.

4 MR. SHIPMAN: And answer the question. Nothing
5 else, okay?

6 THE WITNESS: Okay.

7 MS. CRUZ: I just want to make sure you're
8 getting that on the record.

9 COURT REPORTER: Yes.

10 MS. CRUZ: Because Judge Hinkle recently ruled
11 that that's completely inappropriate to do. So if it
12 continues, we will seek --

13 MR. SHIPMAN: It's inappropriate to instruct a
14 witness to pay attention?

15 MS. CRUZ: Yes. Yes, it is. I'll get you the
16 order and we'll file for sanctions.

17 MR. SHIPMAN: I'm sure that Judge Hinkle and I
18 can talk about it.

19 MS. CRUZ: Yeah, I'm sure.

20 MR. SHIPMAN: Okay. Now, Cecilia, you
21 understand, pay attention to the question, please.

22 THE WITNESS: Don't tell them more than I'm
23 supposed to.

24 MR. SHIPMAN: Well, you need to answer the
25 question.

1 THE WITNESS: I will. Okay.

2 MR. WEBSTER: Did you get that part, too, where
3 she said don't tell them more than I'm supposed to?
4 Okay.

5 Q. (BY MR. WEBSTER) You have an attorney here
6 today?

7 A. Gary Shipman.

8 Q. Does he represent you in your personal capacity
9 or is he the County attorney?

10 A. He's not the County attorney. He is my personal
11 capacity.

12 MR. SHIPMAN: Nor have I ever represented the
13 County.

14 Q. (BY MR. WEBSTER) So he's not being paid by the
15 County --

16 A. No.

17 Q. -- for you to appear here today for a deposition?

18 A. No.

19 Q. Now, who is Tony? You said Phony Tony. Who is
20 Tony?

21 A. Tony Anderson.

22 Q. What position was he running for, what office?

23 A. County commissioner.

24 Q. Was he a friend of yours?

25 A. Acquaintance.

1 Q. Is it somebody that you supported his candidacy?

2 A. Yes.

3 Q. So you said some crazy called and complained that
4 you had taken a Tony sign?

5 A. Yes.

6 Q. Now, you said a Phony Tony. So opponents of
7 Mr. Anderson -- is that his name?

8 A. Yes.

9 Q. Were making signs. They called him Phony Tony
10 essentially. Is that what I'm understanding here?

11 A. Yes.

12 Q. And so the allegation was that you had stolen
13 somebody's sign, I guess?

14 A. Yes.

15 Q. So to the extent that you would have been
16 investigated, it would have been for allegedly taking
17 somebody's property?

18 A. Yes.

19 Q. And when would that have been, ma'am?

20 A. The last election.

21 Q. When was that?

22 A. Twenty -- whatever this year is, 2016.

23 Q. The last primary?

24 A. Yes, like, months, a few months down the road,
25 past.

1 Q. Just a few months ago?

2 A. Yeah.

3 Q. And who was the crazy -- the person you referred
4 to as the crazy who called?

5 A. Linda Morris.

6 Q. Did you know Linda Morris before she called and
7 complained against you?

8 A. Just from social media.

9 Q. Who is she? Is she politically active or is she
10 just a constituent who likes to talk on social media?

11 MR. SCHARLEPP: Form.

12 A. Who is she? She's a lady that lives in a house
13 on Highway 90.

14 Q. (BY MR. WEBSTER) She doesn't hold a political
15 office that you're aware of?

16 A. No.

17 Q. Did you take the sign to her property and dump it
18 in her front yard?

19 A. No, I gave it to the state attorney.

20 Q. So you did take the sign?

21 A. Oh, God. From DOT yard, along with about 200
22 more signs.

23 Q. Okay. So DOT had gone around and had cleaned the
24 right-of-way of signs, basically political signs?

25 A. Yes.

1 Q. And it was in the DOT yard. So were you going
2 there to pick up your signs from your campaign having ended?

3 A. No.

4 Q. Okay. I guess why were you at the DOT yard?

5 A. To pick up signs.

6 MR. ADKINSON: Can we take a break a minute? I
7 need to talk to counsel.

8 (WHEREUPON, A BREAK WAS TAKEN.)

9 Q. (BY MR. WEBSTER) Mr. Shipman has offered me some
10 context for the discussion about the signs and the
11 campaigns. I just want to make sure that I'm clear as to
12 DeFuniak Springs Police, to the extent that they were
13 involved in any complaints against you. This would have
14 been in 2015 or so? 2016, I guess?

15 A. 2016.

16 Q. Just a few months ago. Okay. And to your
17 knowledge that's the only complaint, investigation, or
18 whatever you want to call it that the DeFuniak Springs
19 Police Department has ever opened against you?

20 A. Yes.

21 Q. Personally?

22 A. Yes.

23 Q. Now, have you ever spoken to David Krika, who is
24 the plaintiff in this case?

25 A. No.

1 Q. Do you have any recollection of speaking, and I
2 may have asked and I apologize if I already have, to
3 Detective Bart Smith?

4 A. No.

5 Q. At any point were you made aware that you were
6 under a criminal investigation by the DeFuniak Springs
7 Police Department with respect to campaign contributions?

8 MR. SCHARLEPP: Form.

9 A. No.

10 Q. (BY MR. WEBSTER) To your knowledge, did you ever
11 engage in any sort of significant campaign activities in
12 DeFuniak Springs with respect to taking any sort of campaign
13 contributions from Regional Utilities in DeFuniak Springs?

14 A. No.

15 MR. SCHARLEPP: Form.

16 MR. WEBSTER: Can we have a few minutes?

17 (WHEREUPON, A BREAK WAS TAKEN.)

18 MR. WEBSTER: Back on the record.

19 Q. (BY MR. WEBSTER) Ms. Jones, you testified that
20 there was a subpoena from the FBI for some records. What
21 were the records related to?

22 A. I can't remember.

23 Q. Would a copy of the subpoena be in your office?

24 A. No.

25 Q. Who would have a copy of the subpoena?

1 A. I would assume the County Administrator.

2 Q. Who is the County Administrator?

3 A. Larry Jones.

4 Q. Now, you testified about the sign issue, that you
5 told somebody that you would take it to her house and dump
6 it off at Ms. Morris' house, in her yard. Who did you tell
7 that to?

8 A. A lady city policeman.

9 Q. So a DeFuniak Springs police officer did come to
10 your house or --

11 A. No, no.

12 Q. How did you speak to her, the police officer?

13 A. I went by the office. I went by the City police
14 office.

15 Q. Did somebody call you and ask you to come to the
16 police office?

17 A. No.

18 Q. Why did you go to the police office?

19 A. Because I wanted them to see the signs I got from
20 DOT.

21 Q. How did you become aware that there was a
22 complaint?

23 A. Social media.

24 Q. So somebody put on social media that they had
25 filed a police report against you?

1 A. Yes.

2 Q. Who put that on social media?

3 A. I don't know.

4 Q. But the police department didn't contact you
5 unilaterally to say we've received a complaint against you
6 and we're investigating you for petit theft or whatever the
7 case may be?

8 A. No.

9 Q. No. Did you speak to Chief Weeks at all about
10 the complaint that Ms. Morris brought against you?

11 A. I can't remember.

12 Q. So it's possible that you did?

13 MR. SCHARLEPP: Form.

14 A. Possibly.

15 Q. (BY MR. WEBSTER) Did you speak to Captain Lolley
16 about the complaint that was filed against you by
17 Ms. Morris?

18 A. No.

19 Q. You know you didn't speak to him. You recall
20 that. But you can't recall whether or not you spoke to
21 Chief Weeks about the complaint?

22 MR. SCHARLEPP: Asked and answered.

23 A. The reason being, I talk to Chief Weeks. I don't
24 usually talk -- I don't know him that well.

25 Q. (BY MR. WEBSTER) You don't know Captain Lolley,

1 but you know Chief Weeks pretty well?

2 A. When I see him I know him.

3 Q. Okay. So it's possible you talked to Chief
4 Weeks. You can't remember specifically because you speak to
5 him quite often.

6 A. No.

7 Q. Is there any reason why you can't remember
8 whether or not you talked to the city marshal about an
9 allegation that you had stolen somebody's property within
10 the past few months?

11 MR. SCHARLEPP: Form.

12 A. I can't remember specific conversations with him
13 other than, how's your family doing? I don't remember.

14 Q. (BY MR. WEBSTER) And did you say that you told
15 somebody at the DeFuniak Springs Police Department that you
16 would take the sign and give it to the state attorney?

17 A. No.

18 Q. Did you give the sign to the state attorney?

19 A. I sure did.

20 Q. Did you do that before or after you spoke to the
21 police officer with the DeFuniak Springs Police Department?

22 A. Afterward.

23 Q. So you -- you decided just to stop by the
24 DeFuniak Springs Police Department based upon something you
25 read on social media, correct?

1 A. Uh-huh.

2 Q. Is that a yes?

3 A. Yes.

4 Q. And you spoke with the police officer. Who was
5 the police officer you spoke with?

6 A. A lady.

7 Q. You don't know her name?

8 A. No.

9 Q. Did she fill out a report? Was there a criminal
10 investigation ongoing against you?

11 MR. ADKINSON: Asked and answered, I believe.

12 MS. CRUZ: You cannot object in these
13 depositions. Zack can object.

14 A. In my presence she did not write anything down.

15 Q. (BY MR. WEBSTER) Were you aware -- do you know
16 if there was actually a criminal investigation ongoing
17 against you?

18 MR. SCHARLEPP: Asked and answered.

19 A. Do I know? No.

20 Q. (BY MR. WEBSTER) Were you Mirandized?

21 A. What's Mirandized?

22 Q. Did they read you your rights?

23 A. Oh, no.

24 Q. Say you have the right to remain silent?

25 A. No, no. It was me talking.

1 Q. It was very casual?

2 A. Yeah.

3 Q. And you admitted that you took somebody else's
4 property?

5 A. I did not.

6 Q. You didn't admit that?

7 A. No, I did not.

8 Q. How do you explain having somebody else's
9 property in your possession then?

10 Don't look at them. They can't answer for you,
11 ma'am.

12 A. You go over to DOT and you say, I want all of
13 these signs right here, and there's hundreds. I even have a
14 picture on my truck. And they put -- the gentleman there
15 put all of these signs in my truck and I leave. So I don't
16 know who owned -- I assume Tony Anderson owned all the
17 signs.

18 Q. Okay. So you went to DOT and you told -- you
19 instructed some gentleman there to give you -- to put signs
20 on your truck?

21 A. Yeah. We did it together.

22 Q. Who is "we"?

23 A. The gentleman there and myself, in the hot
24 80-degree weather, put signs in my truck.

25 Q. And why are these signs in the possession of DOT?

1 A. Because they picked them up on the side of the
2 road.

3 Q. So your testimony would be that you didn't
4 realize you took Tony's -- the Phony Tony sign?

5 MR. SCHARLEPP: Form.

6 A. I did not.

7 Q. (BY MR. WEBSTER) So it was just inadvertent that
8 it ended up in the back of your truck?

9 A. Yes.

10 Q. And you're upset that the crazy lady demanded her
11 property back essentially?

12 A. Yes.

13 Q. But the police department didn't investigate you
14 for any crime?

15 MR. SCHARLEPP: Asked and answered.

16 Q. (BY MR. WEBSTER) Correct?

17 A. In my knowledge, no.

18 Q. And then you -- you didn't give the property back
19 to the crazy lady who owned the property?

20 A. No, I went to the state attorney about it. It
21 was an inappropriate political sign.

22 Q. You made that decision unilaterally. Is that why
23 you took it, because you felt like it was inappropriate?

24 A. I didn't take the sign, sir. The guy at the DOT
25 helped me put signs in. I didn't see a "Phony Tony" sign.

1 Q. But then when you realized you had somebody
2 else's property, you decided that it was improper and
3 therefore you were going to unilaterally provide it to the
4 state attorney's office.

5 MR. SCHARLEPP: Form.

6 Q. (BY MR. WEBSTER) Correct?

7 MR. SCHARLEPP: Form.

8 A. I took it to the state attorney's office when it
9 showed up.

10 Q. (BY MR. WEBSTER) Because you didn't -- the lady
11 didn't have the right to get her property back in your mind,
12 correct?

13 MR. SCHARLEPP: Form.

14 A. If it was hers, her property, she needs it back
15 if she wanted it.

16 Q. (BY MR. WEBSTER) Now, when you took it to the
17 state attorney's office, did you file a complaint against
18 her for having an improper political sign?

19 A. No, no.

20 Q. Who did you speak with at the state attorney's
21 office?

22 A. Greg Anchors.

23 Q. And how long have you known Mr. Anchors?

24 A. I don't know. Let's see. Four, five, six --
25 probably ten years.

1 Q. Okay. Did you ask to speak to him specifically
2 or did you just kind of walk in and he happened to be there?

3 A. I think I called his secretary and asked if I
4 could see him. Is this what this is about? This is
5 ridiculous.

6 MR. SHIPMAN: Is this a suit over a firing that
7 happened five years ago? Because if it is, it seems
8 like you're kind of harassing this witness.

9 MR. WEBSTER: I'm making sure that I understand
10 all of her involvement with the DeFuniak Springs Police
11 Department and I have the right to ask these questions.
12 If she received preferential treatment from the
13 DeFuniak Springs Police Department, it is one hundred
14 percent directly relevant to my case.

15 MR. SHIPMAN: And we sat here quietly while you
16 asked about the DeFuniak Springs Police Department.
17 Now you're asking about the state attorney and
18 something that occurred in 2016.

19 MR. WEBSTER: Your objection is noted.

20 MR. SHIPMAN: I'm not objecting. I'm pointing
21 out --

22 MR. WEBSTER: Well, then what you are doing
23 then?

24 MR. SHIPMAN: Counsel, it seems to me like you
25 are harassing this witness at this point.

1 If you are asking questions about something
2 that's five years after whatever your lawsuit is over
3 and has nothing to do with the parties in this lawsuit,
4 it sure seems like it's harassment.

5 MR. WEBSTER: I disagree with you that it has
6 nothing to do with the parties in this lawsuit. That's
7 my point. I disagree with you.

8 Q. (BY MR. WEBSTER) Ma'am, at any point were you
9 made aware that an allegation of illegal campaign
10 contributions had been made against you?

11 A. No.

12 Q. Nobody ever told you that?

13 A. No.

14 Q. Nobody ever told you that a complaint had been
15 filed or information had been provided to the FBI about your
16 having been involved in illegal campaign --

17 A. No.

18 Q. -- contributions?

19 MR. SCHARLEPP: Asked and answered.

20 THE WITNESS: No.

21 Q. (BY MR. WEBSTER) And did your friend Greg
22 Anchors, did he tell you that you should be investigated
23 criminally?

24 MR. SCHARLEPP: Form.

25 A. Greg is my acquaintance.

1 Q. (BY MR. WEBSTER) Okay. Did your acquaintance,
2 Greg Anchors, tell you that you were under investigation for
3 any sort of crime when you met with him and gave him the
4 property that belonged to the crazy lady, Linda Morris?

5 A. No.

6 MR. SCHARLEPP: Form.

7 Q. (BY MR. WEBSTER) And at no point did the Chief
8 or City Marshal Weeks, did he tell you that his office was
9 actively investigating you criminally?

10 A. No.

11 Q. And the DOT yard, where is that located? Is that
12 in DeFuniak Springs?

13 A. Ponce De Leon.

14 Q. Is that in DeFuniak Springs?

15 A. No.

16 Q. It's not.

17 A. No.

18 Q. It would be in the county?

19 A. No.

20 Q. Where is it at?

21 A. Holmes County.

22 Q. Holmes County?

23 A. Yes.

24 MR. WEBSTER: Nothing further. Thank you,
25 ma'am.

1 MR. SHIPMAN: We'll read.

2 MR. SCHARLEPP: I have no questions for
3 Ms. Jones.

4 (Deposition concluded at 9:50 a.m.)
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CERTIFICATE OF OATH

STATE OF FLORIDA

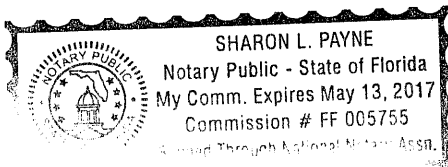
COUNTY OF WALTON

I, the undersigned authority, certify that CECILIA JONES personally appeared before me and was duly sworn this 20th day of October, 2016.

WITNESS my hand and official seal this 6th day of March, 2017.



Sharon L. Payne, RPR
Notary Public - State of Florida
My Commission No. FF 005755
Expires: May 13, 2017



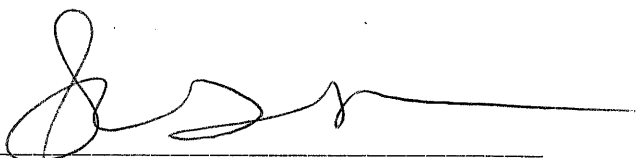
CERTIFICATE OF REPORTER

STATE OF FLORIDA

COUNTY OF WALTON

I, Sharon L. Payne, Registered Professional Reporter, certify that I was authorized to and did stenographically report the deposition of CECILIA JONES; that a review of the transcript was requested; and that the transcript is a true and complete record of my stenographic notes.

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



SHARON L. PAYNE, RPR

ERRATA SHEET

DO NOT WRITE ON TRANSCRIPT - ENTER CHANGES HERE

IN RE: Krika v. City of DeFuniak Springs, et al.

PAGE	LINE	CHANGE	REASON
8	25- Pg 9 Line 2	I did not run for County Commission in 2009	
10	6-8	Took money out of my drop account the first time.	
		The 2nd time I took it out of personal money, the bank.	
17	11	"capacity" should read "attorney" - Gary Shipman is a personal attorney.	

Under penalties of perjury, I declare that I have read my deposition and that it is true and correct subject to any changes in form or substance entered here.

DATE


 CECILIA JONES

(SP)