

IN THE CIRCUIT COURT OF THE
FIRST JUDICIAL CIRCUIT, IN AND FOR
WALTON COUNTY, FLORIDA

CASE NO.: 25CF123
FELONY

STATE OF FLORIDA,
Plaintiff,

v.

JOSEPH TURNER,
Defendant,

_____/

**DEFENDANT'S TENTH RECIPROCAL DISCOVERY SUBMISSION PURSUANT TO
FL. R. Cr. P. 3.220(d)**

COMES NOW the Defendant, JOSEPH TURNER, by and through his undersigned
Counsel and files this Reciprocal Discovery Submission Pursuant to FL. R. Cr. P. 3.220:

Documents:

1. Deposition of Undersheriff Donnie Clark

I HEREBY CERTIFY that a true and correct copy of the foregoing has been
furnished via e-filing to the Office of the State Attorney, SAO2_leon@leoncountyfl.gov,
this 20th day of May, 2026.



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In The Matter Of:

State of Florida v.

Joseph Turner

Deposition of Donald Clark

March 5, 2026

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1 IN THE CIRCUIT COURT OF THE FIRST JUDICIAL CIRCUIT,
2 IN AND FOR WALTON COUNTY, FLORIDA
3 CASE NO.: 25CF123
4 FELONY

5 STATE OF FLORIDA,
6
7 Plaintiff,

8 v.

9 JOSEPH TURNER,
10
11 Defendant.

12 _____ /

13 DEPOSITION OF: DONALD CLARK

14 ON BEHALF OF: Defendant

15 DATE: Thursday, March 5, 2026

16 TIME: COMMENCING AT: 4:08 p.m.
17 CONCLUDING AT: 5:22 p.m.
18 (CENTRAL TIME)

19 PLACE: LOCATION: VIA VIDEOCONFERENCE
20 (ZOOM)

21 REPORTED BY: KAREN RUIZ, RMR

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(No exhibits were marked for identification.)

UNOFFICIAL
DOCUMENT

1 Deposition taken before Karen Adair
2 Ruiz, Registered Merit Reporter and Notary Public in
3 and for the State of Florida at Large in the above
4 cause.

5 * * * *

6 DONALD CLARK,
7 acknowledged having been duly sworn to tell the
8 truth and testified upon his oath as follows:

9 THE WITNESS: I do.

10 DIRECT EXAMINATION

11 BY MS. BOGENSCHUTZ:

12 Q Okay. Can we have you say and spell your
13 name for the record, even though I know it's very easy.

14 A Donald Clark, D-o-n-a-l-d, C-l-a-r-k.

15 Q Okay. And I had gone over this with
16 Ms. Vlahos prior to you appearing. You do go by Donnie
17 quite frequently, but your real first name is Donald;
18 right?

19 A That's correct.

20 Q Okay. And for the court reporter, that's
21 D-o-n-n-i-e; correct?

22 A Correct.

23 Q Okay. Currently, what is your position with
24 the sheriff's office?

25 A I'm the undersheriff.

1 Q Okay. And is that exactly what it sounds
2 like; you're the guy right under the sheriff?

3 A That's correct, number two position.

4 Q Back in -- I don't know. I want to say,
5 like, the winter of '23 into '24, were you a chief
6 deputy instead?

7 A Yes, ma'am. Same position, just a different
8 title.

9 Q Okay. That was going to be my next question.
10 It was not a change in authority?

11 A No, ma'am.

12 Q Just a change in title?

13 A That's correct.

14 Q Okay. And I'm noting that the -- I've got
15 the org chart for the sheriff's office up here in front
16 of me. I'm noting that Dustin -- and can you pronounce
17 his last name for me.

18 A Cosson.

19 Q Cosson. Okay. That he is now considered --
20 or named, I guess, the chief -- the chief -- excuse
21 me -- chief deputy of the sheriff's office; right?

22 A Yes, ma'am. He was last week. Pre --

23 Q That's --

24 A -- to that was Audie Rowell. He was the
25 chief deputy.

1 Q Okay. And so there was a change, what,
2 within the last week?

3 A He was promoted to chief deputy last week.
4 Audie Rowell retired some months back, a few months
5 ago.

6 Q Okay. And what's -- because he now has the
7 same title that you had previously, is there a
8 difference in what he's in charge of or --

9 A Yes, ma'am. So the historical of that is
10 traditionally a chief deputy -- yeah, sheriff's
11 office -- primarily oversees law enforcement function
12 across the board. Some will oversee the jail as well,
13 but it's -- usually it's law enforcement.

14 I, when I was titled the chief deputy,
15 oversaw a whole lot more than that. It was -- law
16 enforcement was about 25 percent of what I oversaw,
17 including professional fire-rescue, administration,
18 finance, and then kind of the project management.

19 And where my emphasis is on day-to-day
20 operation is more the administrative project management
21 side. And, Audie Rowell, his day-to-day duty was
22 overseeing law enforcement.

23 So we made a change back in 2024, a name
24 change, to where I was moved to an undersheriff, which
25 traditionally across sheriff's offices handle more than

1 administrative side. And he was given the rank of
2 chief deputy, which is -- historically oversees
3 specifically a law enforcement function.

4 Q Is he still a direct report to you?

5 A He was at that time, yes, ma'am.

6 Q Or, I guess, is Dustin Cosson a direct report
7 to you now?

8 A Yes, ma'am.

9 Q Or as of -- as of last week?

10 A Yes, ma'am.

11 Q And what position was Dustin Cosson in at the
12 time any of this stuff was -- that's, you know,
13 particularly relevant to this case was happening?

14 A I believe he was a captain in criminal
15 investigation division at that time, and Audie Rowell
16 was his immediate supervisor.

17 Q Okay. And so you know, I was a prosecutor
18 for 12 years. I've been doing criminal defense for,
19 like, five now. But I -- you know, different sheriff's
20 offices run things differently. Criminal
21 investigations division, is that, like, detectives
22 investigating crimes?

23 A Yes, ma'am.

24 Q Okay. And not -- to differentiate it from
25 patrol; right?

1 A Yes, ma'am. Yes, ma'am.

2 Q Okay. So criminal investigations, anything
3 from burglary, battery, to sex bat, homicide?

4 A That's exactly correct. Yes, ma'am.

5 Q Okay. The whole gambit?

6 A Yes, ma'am.

7 Q And is that a fair description of it, that
8 that's a person that's in charge of the detectives --

9 A That's correct.

10 Q -- more than so than the first responders to
11 the scene?

12 A That's correct.

13 Q Okay. All right. So how long have you been
14 with the sheriff's office?

15 A A little over 23 years.

16 Q And did you start there or were you with a
17 different agency first?

18 A No. My entire law enforcement career has
19 been here. I was in the military prior.

20 Q Okay. Thank you for your service.

21 What branch?

22 A Air Force.

23 Q Okay. And how long were you at the Air
24 Force?

25 A Four years.

1 Q Four --

2 A Yes.

3 Q -- not forty; right? Okay.

4 A Yes, ma'am.

5 Q Okay. So four years, Air Force, and then
6 pretty much immediately came over to join the sheriff's
7 office?

8 A Yes, ma'am.

9 Q Okay. So -- and when are you scheduled to
10 retire?

11 A I can retire in 2027, next year.

12 Q Who's counting; right?

13 A Yes, ma'am.

14 Q All right. Is Dustin Cosson related to the
15 sheriff?

16 A Not that I'm aware of, no, ma'am.

17 Q Is he a cousin?

18 A If he is, it's -- you know, has to be, you
19 know, third, fourth, fifth cousin. I don't -- I
20 don't -- I'm not aware of any direct relation, no,
21 ma'am.

22 Q Okay. I was told that the sheriff's
23 biological mother was the sister of Mr. Cosson's. That
24 would make them, I think, nephew and uncle; right?

25 A I'm not aware of that.

1 Q Okay. Now, the sheriff is also related to
2 Clay Adkinson; right?

3 A Yes, ma'am.

4 Q And are they, what, first cousins?

5 A Yes, ma'am.

6 Q Okay. To your knowledge, has the sheriff had
7 any conversations with Clay Adkinson about this case?

8 A You'd have to talk to him about that.

9 Q Okay. I'm saying to your knowledge are you
10 aware of any?

11 A I have not been in -- in -- in a room with
12 them having a conversation about this, ma'am.

13 Q Okay. How about on a phone call?

14 A No, ma'am.

15 Q Have you been in a room with the sheriff
16 having conversations about this case?

17 A Yes, ma'am.

18 Q Okay. Why don't I have you just start at the
19 beginning as to how you got involved in this.

20 A Okay. As I stated, my primary function is,
21 you know, administrative side, dealing with finance and
22 budgets and being that liaison between the sheriff's
23 office and county administration and the commissioners,
24 primarily, you know, dealing with budgets and major
25 projects.

1 I had met Mr. Robertson after he was hired
2 here as, you know, the initial introduction. And we
3 had talked budget a couple times.

4 And somewhere around November-ish of '23,
5 he -- I believe he called me at that time about -- that
6 he was developing, he believed, some corruption going
7 on in Walton County. And he wanted to talk to me and
8 the sheriff at some point about it.

9 You know, I acknowledged it at the time. I
10 ran into him in passing in, I believe, the beginning of
11 December. And he also told me then too that -- at that
12 point he mentioned Mr. Turner's name. He said that he
13 and Joe Turner were looking into some possible
14 corruption in Walton County, and he eventually wanted
15 to bring it to us.

16 And then in mid December-ish, I believe it
17 was Mr. Turner who reached out to Audie Rowell, who
18 was, again, over law enforcement at the time, and asked
19 for us to come meet with him at the county
20 administration building. We did that.

21 At that meeting was Mr. Robertson,
22 Mr. Turner, Nathan Kervin, Mary Keene, Audie Rowell,
23 and myself. The county attorney, Clay Adkinson, showed
24 up later on in the meeting, but he wasn't there in the
25 beginning.

1 They, meaning Mr. Robertson and Mr. Turner,
2 began to explain their -- why they felt about the
3 corruption in Walton County, starting off with an
4 incident at a golf course that resulted in the release
5 of a video. They talked about they believe, based off
6 the context that they were reviewing on a -- on a -- on
7 a text communication between Chas Galloway and Teresa
8 Lowery that they believed that Commissioner Danny
9 Glidewell had involvement, direction of some sort,
10 based off what they saw in these texts to direct --

11 Q Can I -- can I stop you right there.

12 A Okay. Sure. Sorry.

13 Q Yeah. Yeah. It's okay. I mean, I
14 appreciate the -- but you mentioned Commissioner
15 Glidewell. Is he a former deputy sheriff?

16 A Yes, he was.

17 Q When was he a deputy sheriff, to the best of
18 your recollection? I know you don't have it --

19 A He was --

20 Q -- in front of you.

21 A He was working here when I started in 2002.

22 Q Okay.

23 A I don't know exactly when he retired, but it
24 was a -- it was -- it was a few years I worked -- you
25 know, when he -- when he worked with the agency as

1 well.

2 Q Okay. Does he have, like, his own -- I don't
3 know -- commission office off of -- like, on Triple G
4 Road or something like that?

5 A Yes, ma'am.

6 Q Okay. Any idea why Teresa Lowry would serve
7 her lawsuit directly on Glidewell's office?

8 A I have no clue about that.

9 Q Other than, you know, the thing that I like
10 to chalk it up to most is usually just incompetence.

11 Okay. And do you know if Commissioner
12 Glidewell has some kind of, I don't know, a personal
13 aversion to bank accounts?

14 A I have no idea what you're talking about.

15 Q Does he refuse to have a bank account --

16 A First I've heard about it.

17 Q -- that you're aware of?

18 A I've never heard of that before.

19 Q Okay. How often do you meet with
20 Mr. Glidewell?

21 A Once every -- maybe -- probably every two or
22 three months.

23 Q And is it usually on business, or is it,
24 like, social?

25 A Always business.

1 Q Okay. So his position as a county
2 commissioner and your position as -- whatever your name
3 is at the time, the chief deputy or undersheriff?

4 A Yes.

5 Q Okay. Now, at the time that Quinn and Joe
6 asked for this meeting with you or people at the
7 sheriff's office, did they try to give you an iPad?

8 A No, ma'am, not at that time.

9 Q When did they try to give you the iPad?

10 A I believe it was towards the end of December.
11 I had called Mr. Robertson and asked him that -- if we
12 could get the iPad to -- to do our data analysis on it.
13 And at that point is when he turned it over to us.

14 Q Okay. To your recollection and your
15 knowledge, was there ever a meeting that they had with
16 you where they tried to get you to take the iPad as
17 evidence, and you or someone with the sheriff's office
18 refused to take it?

19 A No, ma'am. That didn't happen in our
20 meeting.

21 Q Okay. Or to your knowledge, anyway?

22 A The meeting I was in with -- with them, that
23 did not occur.

24 Q Okay. So if it had occurred, it would have
25 been outside of your presence?

1 A Yes, ma'am.

2 Q Okay. Are you aware of anything that would
3 have been mildly salacious that was contained on that
4 iPad?

5 A You'll have to be more direct with your
6 question. I don't know what you're asking.

7 Q Is there -- is there a video on that iPad
8 that is mildly pornographic or maybe very pornographic
9 that shows Chas Galloway having sex with the
10 daughter-in-law of -- let's see. What's his name?
11 Cory Godwin?

12 A Not to my knowledge.

13 Q Who's Cory Godwin?

14 A He worked with us -- jail director some years
15 back in the past.

16 Q Okay. And is his son's last name Godwin as
17 well?

18 A Yes, ma'am.

19 Q Okay. What's his son's first name?

20 A Cory.

21 Q Okay. Is he a junior, or is it one of those
22 things where they switch the middle name?

23 A I believe he's a junior.

24 Q Okay. So you're completely unaware that
25 there may have been some salacious content on this

1 iPad?

2 A Yes, ma'am.

3 Q Okay. Is there any reason that the iPad
4 didn't get a full extraction once the sheriff's office
5 took custody of it?

6 A You'll have to ask the investigator about
7 that.

8 Q Okay. Are you aware that it didn't have a
9 full extraction?

10 A I don't know the -- I'm not aware of what
11 level of extraction was done with it.

12 Q Okay. So nobody discussed those decisions
13 with you?

14 A No, ma'am.

15 Q Or in your presence?

16 A No, ma'am.

17 Q As -- after the iPad was taken into custody
18 by the Walton County Sheriff's Office, were you being
19 kept up to speed on this investigation?

20 A Occasionally. I think I sat through one
21 briefing with the investigator. And then I -- I was
22 privy to some discussions from time to time but not --
23 not on a routine basis.

24 Q When you say I was sitting in on a discussion
25 with the investigator, do you mean Marthinsen?

1 A Yes, ma'am.

2 Q Okay. So while the case was still with the
3 Walton Sheriff's Office?

4 A Yes, ma'am.

5 Q Okay. And what was that meeting about?

6 A I think he was just -- my recollection is
7 just giving an update of what -- what he had found at
8 that point, and then, you know, some interviews that he
9 had -- he had conducted.

10 Q Is that -- is it usual for you and the
11 sheriff and the brass to be made aware of nonviolent,
12 third-degree felonies that are being investigated?

13 A It's -- if it involves a county
14 administrator, assistant county administrator, yes,
15 ma'am.

16 Q Okay. So that's the interest to the brass, I
17 guess; right?

18 A Yes, ma'am.

19 Q Okay. Is Stan Sunday a former deputy or
20 Defuniak Springs police officer?

21 A Yes. He worked in the sheriff's office as
22 well.

23 Q Okay. How long was he at the sheriff's
24 office, like a career kind of thing?

25 A Yes, ma'am.

1 Q Without making you rack your brain.

2 A Yeah. The same with Danny Glidewell. I
3 don't know when they -- the date they left.

4 Q Okay. Are you aware of Stan Sunday having a
5 conversation with one or both of these defendants where
6 he said, "Oh, just resign and no one will charge you
7 with anything"?

8 A No, ma'am.

9 Q That certainly wouldn't have been signed off
10 on by anybody at your end; right?

11 A Yeah. I'm not -- I don't know anything about
12 that.

13 Q On January 19th of 2024, were you present at
14 a meeting with Keith Riddick?

15 A No, ma'am.

16 Q As the FDLA agent?

17 A No, ma'am, I was not.

18 Q Okay. When did you meet with Investigator
19 Riddick?

20 A I never have.

21 Q Oh, okay. So is it fair to say that the only
22 person from the sheriff's office that was at this
23 meeting with Riddick would have been the sheriff?

24 A No, ma'am.

25 Q Who else?

1 A I don't know, but it's not customary for the
2 sheriff to meet with him alone. I can -- suspect
3 somebody else would have been there, but I don't know
4 who all for a fact was there.

5 Q Okay. But it certainly wasn't you?

6 A No, ma'am.

7 Q Okay. Let's see. At what point was the
8 decision made that FDLE would need to take over this
9 case?

10 A It was around the end of January, first of
11 February, is when we made that decision.

12 Q Who's the "we"?

13 A It was kind of collectively amongst executive
14 staff with Investigator Marthinsen, the chain of
15 command of the sheriff's office.

16 Q Did the sheriff have any input?

17 A Yes, ma'am.

18 Q Okay. And he was in agreement with that?

19 A Yes, ma'am.

20 Q Why was it decided that FDLE should take over
21 this case?

22 A Well, we talked about, you know, the original
23 complaint of -- they were -- I believe Commissioner
24 Glidewell had a part of some of this. Secondly, it
25 come to our attention that possibly Commissioner Donna

1 Johns had some involvement and would require some
2 further investigative -- maybe even interviews. And we
3 didn't feel it was appropriate for our entity to be
4 interviewing our sitting county commissioners and felt
5 that, you know, another agency would be better suited
6 in doing that.

7 Q Can I repeat it back to you the way that I
8 understand it? The commissioners vote on your budget,
9 so that would appear to be some kind of a conflict;
10 right?

11 A Very true. Good -- good point.

12 Q Okay. So that's -- that's a good reason for
13 you guys to want to tap out?

14 A Yes, ma'am.

15 Q And ask FDLE to be involved?

16 A Yes, ma'am.

17 Q Do you have a copy of the letter that you
18 sent?

19 A Not in front of me, no, ma'am.

20 Q I can -- well, it might be -- I don't know
21 how good your eyes are, but I'm going to go ahead and
22 share my screen. And I'm going to try to zoom in on
23 it; okay?

24 A Okay.

25 Q I have to hit "share."

1 Can you read that or you need me -- further
2 in?

3 A No. I'm good. Go ahead.

4 Q Okay. So -- and I'll scroll up and give you
5 the date. It's February 12th of '24 on here.

6 Oops. I'm sorry. I don't mean to make it
7 more difficult.

8 So: "To Walton County employees Quinn
9 Robertson and Joseph Turner."

10 At that point in time, had Quinn Robertson
11 been fired yet?

12 A I don't remember the day he was fired.

13 Q Okay. And was Joseph Turner still working
14 there?

15 A I don't remember that either.

16 Q Okay. This is just -- fair to say this is a
17 formality, asking FDLE to take the case over?

18 A Yes, ma'am.

19 Q Okay. Just to -- because they don't tend to
20 come into your jurisdiction and take stuff away from
21 you, or at least that's not their --

22 A No.

23 Q -- primary purpose in life?

24 A Yes, ma'am.

25 Q So you're naming Quinn and Joseph as the

1 subjects of this investigation; right?

2 A Yes, ma'am.

3 Q Okay. And "as more fully described in the
4 enclosed report," what report did you send them? Was
5 it Marthinsen's?

6 A Yes, ma'am.

7 Q Okay. "They're receiving complaints from
8 multiple individuals pertaining to certain actions
9 undertaken by the subjects" -- so sorry -- "suspected
10 to be criminal in nature. We performed a cursory
11 review."

12 Now, my personal definition of "cursory" is
13 pretty bare bones and surface level. Is that yours?

14 A I would -- I guess --

15 Q And --

16 A -- that's open to interpretation.

17 Q Yeah. No. That's why I'm asking. Like, a
18 cursory investigation, so --

19 A Well, I take that as we haven't -- we hadn't
20 moved into doing interviews of the commissioners and
21 whatnot, as you get to the end of this letter. So
22 that's why -- it wasn't a full investigation, is what I
23 meant by that.

24 Q Right. And the purpose of the investigation
25 was to determine whether further investigation would be

1 warranted: "Following our cursory investigation upon
2 consultation with the State Attorney's Office." And
3 let me ask you: Who at the State Attorney's Office did
4 he consult with?

5 A Mr. Mitchell.

6 Q Okay. So the person sitting -- I mean, I'm
7 looking at him with the yellow tag; right?

8 A Yes, ma'am.

9 Q So they decided that the actions at issue
10 require further investigation for the determination of
11 criminal liability.

12 Were you in on a meeting with the State
13 Attorney's Office about this?

14 A I talked with Mr. Mitchell about it.

15 Q In a meeting, like, face-to-face, or was it
16 on the phone or . . . ?

17 A I don't remember that, actually.

18 Q You don't remember which? You just
19 remember --

20 A I don't remember the conversation, if it was
21 on the phone or face-to-face.

22 Q Okay. Did you-all discuss the elements of
23 the offense that you were investigating?

24 A I believe we discussed the -- the need
25 that -- that we believe that, you know, county

1 commissioners are going to be have to be interviewed,
2 and who was the appropriate agency to -- to do that.
3 And that was pretty much it.

4 Q We're kind of jumping over something before
5 that. I mean, if there was no crime committed, I
6 suppose no one would need to be interviewed; right?

7 A We were -- we were interviewing --

8 Q It was pretty --

9 A -- if a crime had been committed.

10 Q I mean, you were pretty well-convinced that
11 you had evidence of a crime being committed; right?
12 Otherwise, you wouldn't have been looking to continue
13 the investigation?

14 A Yes, ma'am. We had -- we had reasonable
15 suspicion that a crime had been committed. That's
16 correct.

17 Q Okay. And why wouldn't the county
18 administrator be able to look through the entirety of a
19 county-owned iPad?

20 A I believe that the county administrator could
21 look through a county-owned iPad.

22 Q Okay. So what did you believe was the crime
23 here?

24 A Once it's identified that -- that he was
25 observing a private communication between two private

1 parties, that's when it crossed the threshold of,
2 "Okay. I see something that I shouldn't be doing. I
3 should stop at this point" and not continuing to
4 monitor it after the fact.

5 Q Okay. But you do realize that the county
6 employee manual says that there's no expectation of
7 privacy on any county-owned device; right?

8 A I'm assuming that's pretty standard for
9 government agencies to have that policy.

10 Q Right. And that somebody would have to go
11 through all of the messages that appeared on that iPad
12 to determine whether they were public records or not
13 and wouldn't be able to delete them because that would
14 be a violation of state law; right?

15 A I'm not sure about that.

16 Q Well, I mean, if you had found out that one
17 of your deputies had synced their personal iPhone to a
18 sheriff's office iPad, you wouldn't be able to just
19 wipe that iPad, would you?

20 A No, ma'am.

21 Q Because of public records laws; right?

22 A Possibly.

23 Q And because there might be other things on
24 the iPad that had to do with sheriff's office stuff
25 that you shouldn't wipe; right?

1 A That's correct.

2 Q Okay. So what would you do in that
3 circumstance? Would you assign someone to go through
4 the messages to try to determine whether they were
5 public record?

6 A No, ma'am. If I saw that it was a private
7 communication, I -- again, I would have to consult
8 with -- to see if it was, you know, something that we
9 could continue to monitor from a -- from a judge
10 perspective or -- you know, at that point, though, I
11 would stop and not continue to monitor it until I got
12 some direction from -- from a judge.

13 Q From a judge?

14 A Yes, ma'am.

15 Q You wouldn't just try to preserve public
16 records being on your agency's devices?

17 A No, ma'am, not -- not ongoing communication.

18 Q Are you aware that Chas Galloway was asked to
19 delete this profile from the iPad or unsync this iPad
20 from his personal account at least three times?

21 A No, ma'am.

22 Q Are you aware that the IT director, Jason
23 Cook, actually took pictures of the messages that he
24 sent Chas, saying, "Hey, your messages are being
25 displayed on this iPad"?

1 A No, ma'am.

2 Q Is there a reason you didn't list Jason Cook
3 or Jeremy Rowlands as subjects of this investigation?

4 A No, ma'am.

5 Q No, there's no reason?

6 A To my knowledge, at the time they were --
7 they weren't monitoring ongoing private communications.

8 Q Actually, we've taken Jeremy's deposition,
9 and he said he was checking it periodically to see if
10 Chas finally logged out as he had told him to.

11 A Okay.

12 Q Am I still sharing here? Yeah.

13 "We have resolved that the actions require
14 further investigation for the determination of criminal
15 liability and that the actions at issue require
16 further" -- I'm sorry -- "and that such inquiry could
17 reasonably be believed to include the interview of
18 locally affected officials."

19 And that's the county commission nonsense
20 that you -- the sheriff's office didn't want to get
21 involved in; right?

22 A Yes, ma'am.

23 Q Okay. Though, you do kind of cover yourself
24 here in the next sentence.

25 "Though nothing in this request is intended

1 to make any implication of wrongdoing on the part of
2 any elected official, our continued investigation could
3 present a conflict of interest and the appearance of
4 bias for our agency. And we, therefore, respectfully
5 request that FDLE receive the case for independent
6 review and determination. Thank you. And please let
7 us know if you require anything further from our
8 agency."

9 And that's a pretty form letterhead kind of a
10 letter; right?

11 A Yes, ma'am.

12 Q Okay. So fair to say at the time that you
13 penned or typed or somebody typed on your behalf this
14 letter, like, you weren't ready to make an arrest? You
15 realized the county commissioners might be involved and
16 kind of went hot potato with it; right?

17 A Yes, ma'am. We wanted to -- didn't feel like
18 we were appropriate to -- to continue the
19 investigation.

20 Q Okay. Do you know if anybody from the
21 sheriff's office followed that up with a phone call to
22 Keith Riddick?

23 A I'm not aware.

24 Q Okay. Which would certainly mean you didn't;
25 right?

1 A No, ma'am, I did not.

2 Q Okay. Any idea who would have made that
3 phone call?

4 A No, ma'am.

5 Q Are you aware of what I'm talking about as to
6 the existence of a phone call after this letter was
7 sent?

8 A No, ma'am. No, I'm not aware.

9 Q I will just tell you that Keith Riddick said
10 he received a phone call after this that said -- from
11 the sheriff's office telling him only investigate Donna
12 Johns, not these two.

13 A That's the first I've heard of that.

14 Q His depo was the first I heard of it so --
15 two of us.

16 So he continued telling us in his depo he
17 never investigated Quinn Robertson or Joe Turner, and
18 his only investigation was Donna Johns. So if you had
19 only done a cursory investigation, he's claiming he did
20 no investigation.

21 Can you explain to me why Mr. Mitchell
22 decided to file charges?

23 MR. MITCHELL: Objection. Mr. -- the
24 undersheriff has no possible idea why the State
25 did or didn't file anything.

1 BY MS. BOGENSCHUTZ:

2 Q But are you aware -- or was there any
3 discussions or any information passed to you as to
4 whether there was some other law enforcement agency
5 involved in investigating these two that would have
6 caused the State Attorney's Office to file charges?

7 A No, ma'am. I'm not aware of any other
8 investigation.

9 Q Okay. Now, what I am reading here is, like,
10 you know -- for lawyers we call it a conflict. Like,
11 you know, one of my former clients ends up -- is listed
12 as a victim in a case. Somebody comes to me on that
13 case and says, "Hey, will you represent me?"

14 And I'll look at the police report and say,
15 "I can't" -- "I can't do this. My former client's
16 listed here."

17 You know, it's a pretty easy conflict off. I
18 have to conflict off. I can send you to somebody else.

19 "Here" -- you know, "Here's my friend. He's
20 very good at his job."

21 As to law enforcement, does the sheriff's
22 office often conflict off the cases like this?

23 A I wouldn't say often, but it is standard
24 practice of passing on to another agency if there is a
25 conflict discovered.

1 Q Okay. So, like, would you ask another agency
2 to investigate if the subject was a deputy or a former
3 deputy, or would that maybe not reach the threshold?

4 A It's possible. For example, you know,
5 officer-involved shootings that result in death, we
6 often have Florida Department of Law Enforcement come
7 in and do the investigation on the use of force of
8 that -- you know, that shooting.

9 Q Yeah. That's a -- that's a good example. So
10 there's -- you know, that's kind of protocol, right,
11 for a death or an officer-involved shooting?

12 A Yes, ma'am.

13 Q How about for a case that is not involving an
14 officer-involved shooting like this one that's a
15 third-degree felony, you know, but for the identity of
16 the persons involved, probably not newsworthy?

17 A No, ma'am. No. We -- I guess to answer your
18 question, we -- we also investigate our own deputies if
19 there are law violations.

20 Q Okay. So this one -- I mean, other than the
21 police shootings you've spoken of, are there other
22 cases that you guys have, for lack of a better term,
23 "punted" through FDLE?

24 A Other than, you know, maybe, like, complex
25 frauds or, you know, multistate, you know, financial

1 crimes investigation that maybe we just don't have the
2 expertise for, but other than that, no, ma'am.

3 Q Okay. So as far as a conflict goes, is this
4 the only case that you're aware of that you've asked
5 them to take because of a conflict?

6 A It's the only one that comes to mind right
7 now.

8 Q Okay. And, obviously, you've worked there
9 for 23 years; there may be another one, but the only
10 one that comes to mind?

11 A Yes, ma'am.

12 Q Okay. So I have to imagine that there were
13 pretty extensive meetings about this?

14 A Not that I'm aware of.

15 Q Who made the ultimate call that it was going
16 to FDLE?

17 A It was -- it was a collective decision. I
18 don't -- I don't know if one single person made the
19 call.

20 Q Okay. It wasn't, like, a vote or anything?
21 It's just everybody at the table kind of agreed?

22 A Yes, ma'am. That's correct.

23 Q Okay. Did you know that your agency or the
24 executives in your agency were watching closely when
25 Quinn Robertson was arrested?

1 A I don't have any idea what you're talking
2 about.

3 Q Your agency was involved in extraditing
4 him --

5 A Yes, ma'am.

6 Q -- even though you had conflicted off. Can
7 you kind of explain that.

8 A I mean, as -- part of the jail duties of a
9 sheriff is we're charged with extraditing inmates that
10 have been arrested back to the county to, you know,
11 receive first appearance in front of a judge here.

12 Q Okay. My understanding is that there's a
13 transport agency that is often used; is that fair?

14 A We do, depending on certain criteria.

15 Q What are those criteria?

16 A Availability of staff to do transport, the
17 location of the inmate in -- you know, in the country
18 and --

19 THE COURT REPORTER: I'm sorry. "The
20 location of the inmate in" what?

21 THE WITNESS: In the country.

22 THE COURT REPORTER: Okay. Thank you.

23 THE WITNESS: And, you know, financial
24 factors of what it would -- what it would cost to
25 have the inmate move with a third-party company.

1 BY MS. BOGENSCHUTZ:

2 Q Okay. And in this case, the sheriff's office
3 bought a ticket for a courtroom bailiff to fly to
4 Virginia; right?

5 A I'm not aware of a courtroom bailiff, no,
6 ma'am.

7 Q Are you aware that a guy named Ed Gandy was
8 apparently bought a ticket to Richmond, Virginia, on
9 very short notice?

10 A He is our extradition deputy. That's all he
11 does every day, is -- is go get inmates from other --
12 other counties, other jails.

13 Q He's not a courtroom deputy; he's an
14 extradition deputy?

15 A That's correct. He hadn't worked a courtroom
16 in ten-plus years.

17 Q Okay. Do you know if he flew with his
18 firearm on the plane?

19 A I'm not aware of -- I don't know what he had
20 on him.

21 Q Okay. Is there a direction from the
22 sheriff's office as to whether employees should fly
23 with their firearms?

24 A There is guidance on how to fly with a
25 firearm.

1 Q Usually not loaded, I would assume --

2 A We don't carry firearms --

3 Q -- is preferable?

4 Are you aware that there needs to be notice
5 to federal agencies before someone flies with a firearm
6 on their person?

7 A Part of our policy is getting the approval
8 processed ahead of time.

9 Q Okay. Would you expect Mr. Gandy to have
10 transported Mr. Robertson without a firearm on him?

11 A I guess it's possible.

12 Q When you say "possible," does that also mean
13 unlikely, but possible?

14 A Yeah. I would -- I would seem to think that
15 he would transport inmates with a firearm on him.
16 Correct.

17 Q Okay. So we've got Mr. Gandy probably flying
18 on commercial flights with a firearm with a felony
19 person in custody. How many times does Mr. Gandy fly
20 on planes with inmates in custody?

21 A I don't know the exact number.

22 Q We'd have to ask him?

23 A That's correct.

24 Q Prior to this date, had he ever done that
25 before?

1 A I believe so, yes, ma'am.

2 Q Okay. Do you know if the proper federal
3 authorities were alerted to the fact that Mr. Gandy was
4 going to be carrying a firearm on a commercial flight?

5 A That is our policy, that they do that ahead
6 of time, but I don't know 100 percent in this case.

7 Q Well, usually, it's required to do it 48
8 hours in advance. Was this ticket even bought 48 hours
9 in advance?

10 A I don't know when the ticket was bought.

11 Q Okay. Any idea why there was suddenly a rush
12 to get Mr. Robertson back to Walton County?

13 A No, ma'am.

14 Q Okay. Do you have any idea why there wasn't
15 a courtesy bond set for Mr. Robertson?

16 A No, ma'am. The bond's set by the judge.

17 Q Yeah. So any idea why you'd be extraditing
18 somebody without a Judge's signature?

19 A We received a valid warrant to -- and it was
20 served in -- I'm not even sure what state he was at.
21 And that was our legal reason to go get him.

22 Q Okay. Do you know who's responsible for
23 putting a warrant in NCIC? Is it the clerk, or is it
24 the sheriff's office?

25 A I think there's examples of both.

1 Q Okay. Do you know who did it in this case?

2 A No, ma'am.

3 Q Okay. So what you're saying is that in
4 certain circumstances it could be one or the other, I
5 guess, in Walton County?

6 A Yes, ma'am.

7 Q Okay. Your agency -- I guess you're saying
8 that the jail portion of your agency did the
9 extradition and brought him back to Walton County;
10 right?

11 A Yes, ma'am.

12 Q Okay. Why did the criminal investigations
13 part of your agency request his jail calls?

14 A You'll have to talk to them about that.

15 Q Any idea why the jail calls didn't even make
16 it into evidence?

17 A No, ma'am, I don't know why.

18 Q Do you know where they were kept over the
19 past year?

20 A No, ma'am.

21 Q Do you know who listened to the jail calls
22 after your agency recused itself from this
23 investigation?

24 A No, ma'am.

25 Q I got it earlier today. I found out (audio

1 interruption).

2 MR. MITCHELL: I'm sorry. You broke up

3 there. Did you say something, Ms. Bogenschutz?

4 BY MS. BOGENSCHUTZ:

5 Q I said earlier today I found out -- and I had
6 sent it over to Mr. Mitchell. I didn't get this until
7 this morning. And then I had to go pay for an MSG
8 reader, which was news to me.

9 I like to do -- I like to request records
10 even when it's not . . .

11 Even when it's potentially a -- just a waste
12 of money.

13 So here's an email from Leah McLeod. She
14 works for you?

15 A Yes, ma'am. She works in the jail.

16 Q Okay. So that's Thursday, February 27th,
17 around 1:00 p.m. -- or I guess that's Eastern Standard
18 Time because I got all these records from Henrico
19 County. Walton said they didn't have these. So it's
20 going to be Eastern Standard Time up here, and then I
21 think that if there's a -- maybe a difference in the
22 two times that it probably has to do with you being on
23 Central Time.

24 And then she follows up, like, three hours
25 later because she hasn't gotten a response.

1 "We haven't received the waiver of
2 extradition. He can be transported much sooner than
3 the March 18th deadline. Our administration is pushing
4 to get this one scheduled."

5 Any idea who's pushing for that?

6 A No, ma'am.

7 Q Somebody in administration?

8 A I'm not sure who it was.

9 Q Okay. "We're just waiting on the waiver to
10 do it."

11 So she reaches out for the first time 12:44
12 Eastern Standard. And then she replies to herself
13 three hours later and attaches the direct file capias.

14 And then you can see down here it says,
15 "11:45." And I would assume that's because it's --
16 that's Central Time coming from her.

17 And "I apologize to keep at you." This is
18 close to three. "I'm getting it from my executive
19 staff due to who the subject is. They are all looking
20 at this."

21 Any idea who the executive staff is?

22 A I don't know who she's referring to.

23 Q And then he apologizes and said, "Sorry. I'm
24 working on it right now. I had to take care of
25 something else that came up. You will have it

1 momentarily."

2 And then I think this is the rest of the
3 email trail.

4 And she says, "Okay. Thank you so much."

5 And then we've got some later emails here --
6 sorry. I don't mean to make you seasick on this --
7 from someone at Henrico saying, "If you could contact
8 me" -- this is to Barbara Hall. She works for you;
9 right?

10 A Yes, ma'am. She works in warrants as well.

11 Q Okay. Is that in the jail, or is that, like,
12 in the sheriff's office in warrants?

13 A It's in the jail.

14 Q Okay. So he's saying -- or Nathan Solomon in
15 Henrico is saying, "If you could contact me at 804" --
16 Richmond phone number -- there's a little nostalgia
17 because I went to school up there -- "or you can email
18 me here with the date and time. We are a 24/7
19 facility. Even if it's an early pickup, we can still
20 accommodate that for you."

21 And she says, "I'm scheduling our transport
22 company to pick him up for us. I've given them a
23 deadline of 3/10/25 to pick up. Usually they pick up
24 prior to that date. Is there a phone number you want
25 them to call when they know for sure what date they

1 will pick up? Our transport company is Homeland
2 Protection and Transport."

3 And that was sent at -- again, I think
4 it's -- I don't know -- I believe this is Henrico
5 printing it for me, but, 1508. Somebody's got it set
6 to military time. So 3:08 p.m. on February 27th he's
7 got -- we're getting this deadline to do this. And
8 then for some reason we had --

9 MR. MITCHELL: Ms. Bogenschutz, can I ask
10 what this has to do with Mr. Turner?

11 MS. BOGENSCHUTZ: Yes. It would appear --
12 actually, I'll get to it.

13 BY MS. BOGENSCHUTZ:

14 Q Was your agency trying to keep Quinn
15 Robertson in custody so they could listen to jail
16 calls?

17 A No, ma'am.

18 Q Not to your knowledge, anyway; right?

19 A No, ma'am.

20 Q Okay. What do you know about this agency
21 trying to arrest Joe Turner at home?

22 A I'm not aware of how any warrants were served
23 on Mr. Turner.

24 Q There was no communication between your
25 office and the Wichita Police Department?

1 A Not to me. I'm not aware of any.

2 Q Okay.

3 I'll close this and open the other one.

4 Henrico was so good that they gave me their
5 Post-It notes saying someone named Burlington -- or
6 maybe Burlison had made phone calls and -- about
7 Sergeant Gandy and 3/5 he was going to be flying in.

8 You know nothing about why this was suddenly
9 an accelerated timeline?

10 A No, ma'am.

11 Q Who's Mr. Burlison?

12 A He was the jail director, I believe, at this
13 time. He worked at the jail. I may be wrong about the
14 jail director. He was just recently the jail director.
15 I just don't know the date when he was promoted to jail
16 director. But he -- he was working at the jail at this
17 time.

18 Q Okay. Would he be the one that was making
19 Gandy's flight arrangements?

20 A I believe Sergeant Gandy reported to him over
21 there, but I don't know who was scheduling the flight
22 arrangements.

23 Q Do you have a policy that your agency should
24 not be requesting the jail calls of an investigation
25 they've recused themselves from?

1 A No, ma'am.

2 Q Or that they -- nobody should be using their
3 position as a law enforcement officer to listen to jail
4 calls that do not pertain to an investigation that
5 they're involved in?

6 A We do not have a policy that says that, no,
7 ma'am.

8 Q Why was Dustin Cosson listening to Quinn
9 Robertson's jail calls?

10 A I'm not sure. You'll have to ask him.

11 Q Okay. And, again, you would have no reason
12 as to why Dustin Cosson didn't put them in evidence?

13 A I don't -- I don't know anything about it,
14 no, ma'am.

15 Q Or why Investigator Riddick was emailing
16 Mr. Mitchell, saying, "Oh, guess who he called? It was
17 Donna Johns. I'll let you know how interesting it
18 was"?

19 A I know nothing about that.

20 Q And how we didn't find out any of those calls
21 even existed until I made a public records request.

22 A I don't know nothing about that either.

23 Q If a deputy or somebody in your agency is in
24 possession of evidence and they fail to put it in
25 evidence, is that a problem?

1 A If it's actual evidence, yes, ma'am.

2 Q Do you think jail calls are actual evidence?

3 A They could be.

4 Q So you can request something, decide it's not
5 evidence, and not preserve it?

6 A Yes, ma'am. I believe, you know, jail phone
7 calls in the context of this situation with an
8 extradition can be reviewed for security purposes.

9 Q Was there a security issue?

10 A I'm just saying there could be. I don't know
11 the facts of what you're asking. I'm -- I'm just
12 saying what jail phone calls could be requested for.

13 Q Is there a -- would you be worried about the
14 Richmond Police Department's or the Henrico Sheriff's
15 Office security?

16 A No, ma'am. It's just, you know, a common
17 practice -- when you're extraditing an inmate from, you
18 know, multiple states away, and -- and, as you say, on
19 the airline, you know, to do certain -- secure
20 assessments prior to doing that to -- to see if it's,
21 you know, any reason not to take them on a -- on a
22 commercial airline.

23 Q That would make sense if it weren't for the
24 fact that we've got the emails that they were
25 requesting them days after Robertson was transported?

1 A I'm not aware of the timeline of that.

2 Q How is Ashley McCormick related to Boots
3 McCormick?

4 A I'm not sure.

5 Q Do you know they are related?

6 A I'm assuming they are, but I don't know the
7 details of it.

8 Q Okay. What does Ashley do?

9 A He is -- works at the jail.

10 Q Doing what? What was his position at the
11 time?

12 A I knew you were going to ask that. He was
13 either a lieutenant or a captain. He's -- he's
14 currently a captain of the jail. I just -- as I said
15 before, I don't remember the exact date.

16 Q That's fair.

17 There's a lot of, like, footers on these
18 emails --

19 THE COURT REPORTER: Did you --

20 BY MS. BOGENSCHUTZ:

21 Q -- that take up space here.

22 THE COURT REPORTER: Did you say "footers"?

23 MS. BOGENSCHUTZ: Yeah. Footers. I'm sorry.

24 I meant, like --

25 THE COURT REPORTER: No. That's okay.

1 MS. BOGENSCHUTZ: -- you know, they've got
2 their little badges and stuff.

3 BY MS. BOGENSCHUTZ:

4 Q So March 6th at 3:06 -- oops. No. I
5 apologize. March 6th at 2:09 p.m. -- I think that's
6 after Quinn Robertson's back at the jail. Ashley is
7 requesting these jail calls from Henrico. I think he
8 had already bonded out.

9 Do you think that would be a security risk?

10 A Again, I'm not aware of the timeline of when
11 Mr. Robertson was extradited here or -- or what.

12 Q I also have, from the previous day, 2:25 a.m.
13 Eastern Standard time -- I'm not sure what that is, but
14 somebody named Burlison had called over and requested
15 them as well. And then we've got an email saying
16 Dustin Cosson's listening to them.

17 Does that sound like something that you would
18 recommend your employees do?

19 A Again, it's common practice to, you know,
20 assess the security of moving -- when you're moving an
21 inmate that far on a commercial airline.

22 Q Well, the email that I have -- or the email
23 that I used to tell Mr. Mitchell that these jail calls
24 existed was sent later that month. I don't think he
25 was still in custody.

1 A Yeah. I'm not -- I'm not familiar with the
2 exact timeline of those events.

3 Q Who is Alli Lytle or Lytle?

4 A Alli Lytle?

5 Q Yeah.

6 A She was the sheriff's executive assistant.

7 Q That's past tense. Is she no longer there,
8 or was she moved to a different role?

9 A Yes, ma'am. She rotated back to the law
10 enforcement division.

11 Q What does that mean? What is -- what's the
12 difference?

13 A She had -- she had taken, I guess, a rotation
14 as his administrative aide and then was there a couple
15 years and then has rotated back out to -- to law
16 enforcement, you know, a deputy sheriff.

17 Q This isn't a quiz, so if you don't know this,
18 it's okay. Do you know when the rotation was
19 approximately?

20 A No, ma'am. I'd -- I'd be guessing.

21 Q Okay. So you could find that out somewhere,
22 but off the top of your head --

23 A Yes, ma'am. I could get you those dates.

24 Q Okay. Not a big deal. Is it pronounced
25 Little [phonetic] or Lytle?

1 A Lytle.

2 Q Okay. I was given this piece of discovery by
3 the -- by the State. I'm going to show it you on this
4 screen over here. I thought I had it ready to go, but
5 I'm . . .

6 Give me one second. I'm going to reopen it.
7 I think I've overdone my -- oh, there we go. I had it
8 up.

9 So this is an Adobe document that was given
10 to me as discovery by the State Attorney's Office.
11 It's FDLE Case No. EI-14-0196. It apparently doesn't
12 name Donna Johns here as a subject, but that he names
13 Quinn and Joe. So that's the -- in the seal and
14 everything like that.

15 Any idea why Alli Lytle is writing her
16 comments in the margins?

17 A No, ma'am.

18 Q Is that common, to have, like, mock-up --
19 does that happen, to have . . . ?

20 A I don't know what that's about.

21 Q It says January 24th. Any idea what year
22 that would have been?

23 A Sorry. I'm trying to read the comments,
24 but --

25 Q Oh. I'm sorry. Do you need me to make them

1 larger?

2 A No. I'm good. I just have to get a little
3 bit closer. But, no, ma'am, I don't know anything
4 about that.

5 Q Okay. And you said she was the executive
6 assistant to the sheriff; right?

7 A Yes, ma'am.

8 Q Okay. Do you think -- she was sworn law
9 enforcement, though?

10 A Yes, ma'am.

11 Q So as executive assistant to the sheriff,
12 would she be reviewing something on his behalf or
13 typing out something that he told her?

14 A She worked cases as well as being his
15 executive assistant.

16 Q Okay. So is it -- is it -- was she involved
17 in this case at all, or do you have any knowledge of
18 that?

19 A I do not have any knowledge of that, no,
20 ma'am.

21 Q Okay. Do you have any knowledge or were you
22 involved in any meetings with Mark Glass?

23 A No, ma'am. I've never spoken with him.

24 Q Like, ever in your career or --

25 A No. I sure haven't.

1 Q What about Mike Barker having any meetings
2 about this case?

3 A I know who you're talking about, but I don't
4 think -- I have no knowledge of him even really having
5 ties to this case.

6 Q You said you're scheduled to retire in '27,
7 or you can retire in '27? Do you have that right?

8 A I can retire, yes, ma'am.

9 Q So is it kind of up to you or what's the --

10 A Yes, ma'am.

11 Q Okay. And is it kind of a thought that
12 Dustin Cosson would be taking your position?

13 A We have not had that discussion at all, no,
14 ma'am.

15 Q Okay. Is there any thought as to who might
16 take your position if not him?

17 A No, ma'am. I mean, I guess it's good
18 business to be succession planning with multiple people
19 involved but no direct conversation of who would be my
20 replacement.

21 Q Okay. Do you remember when Joe Turner turned
22 himself in?

23 A I remember that it happened, but I don't
24 remember the specifics on it.

25 Q Do you know if Sheriff Adkinson had direct

1 contact with the sheriff of Henrico County, Virginia?

2 A Not to my knowledge, no, ma'am.

3 Q Not to your knowledge, which means maybe?

4 A I guess he could have. I don't --

5 Q Outside of your knowledge?

6 A I have no knowledge of that.

7 Q Is it a possibility that the sheriff asked --
8 Sheriff Adkinson asked the sheriff of Henrico County,
9 Virginia, to continue holding Robertson, and that's why
10 Gandy was put on a flight so quickly?

11 A I would say -- and I don't mean no disrespect
12 with this response but, I mean -- but your question
13 kind of seems to kind of contradict itself when
14 you're -- you're saying the sheriff is asking to hold
15 him longer but, yet, we sent the extradition deputy up
16 there soon to get him. That question, I guess -- I
17 don't understand what you're saying, I guess. It kind
18 of contradicts itself.

19 Q Yeah. That, basically, the sheriff of
20 Henrico County said, "Look. I'm going to release him
21 because this is a third-degree felony. It's
22 nonviolent. He should be bondable."

23 And the sheriff then said, "Well, just hold
24 him one more day and we'll get Gandy up there."

25 A I see what you're saying. No, ma'am, I don't

1 believe that happened.

2 Q And that was my -- you know, my mistake as to
3 how I explained that.

4 When you get jail calls from another agency,
5 do you generally put it into evidence --

6 A No.

7 Q -- at the Walton Sheriff's Office?

8 A No, ma'am.

9 Q Why not?

10 A Again, I think -- majority of times when jail
11 phone calls would be requested in this context is for
12 the security assessment of the transport. It has
13 nothing to do with the -- with the evidence of a crime.

14 Q Okay. And if the interest is more in
15 listening to Donna Johns on the phone, then it would
16 certainly be part of the investigation; right?

17 A Not necessarily, no, ma'am.

18 Q Okay. So just to put a finer point on this:
19 cursory investigation by the Walton Sheriff's Office;
20 you kind of washed your hands of it when FDLE took it
21 over; and, thus, you're unaware of any other agency
22 that did any kind of investigation in this case?

23 A That's correct.

24 Q Okay. So cursory investigation by Walton, no
25 investigation by FDLE, filed case by the State

1 Attorney's Office?

2 A I don't know what -- the extent of FDLE's
3 investigation was but -- but us referring it to them,
4 it is correct.

5 Q Did you have any internal discussions about
6 FDLE, the quality of their investigation in the past
7 six months?

8 A No, ma'am, I haven't.

9 Q Do you know of any?

10 A No, ma'am.

11 Q Has the sheriff's office undertaken the
12 investigation of other offenses against Quinn Robertson
13 and Joe Turner?

14 A Not that I -- not to my knowledge, no, ma'am.

15 Q Okay. Any reason that a prosecutor would
16 have put on the record at our last court date that they
17 wanted our clients present, quote, "in case the charges
18 changed"?

19 MR. MITCHELL: I don't think that
20 Undersheriff Clark could adequately answer that.

21 But if you have any knowledge why that would
22 be said, feel free to answer.

23 THE WITNESS: No, ma'am. I have no knowledge
24 of that.

25

1 BY MS. BOGENSCHUTZ:

2 Q But, certainly, you've already -- there's no
3 ongoing investigation to your knowledge?

4 A No, ma'am, there's not.

5 Q Okay.

6 MR. MITCHELL: Ms. Bogenschutz, I don't mind
7 clearing that up for you if you want me to if
8 you --

9 MS. BOGENSCHUTZ: Yeah. It's fine. Yeah.

10 MR. MITCHELL: The only thing we'll say about
11 that is, with the statement particulars, if the
12 judge orders the statement of particulars, there
13 may be -- instead of having one all-encompassing
14 count, it may be multiple counts for each message
15 they looked at.

16 MS. BOGENSCHUTZ: Great.

17 BY MS. BOGENSCHUTZ:

18 Q Okay. I think that's -- oh. Have you had
19 any contact with Keith Riddick since this case was
20 filed?

21 A No, ma'am. I've never spoken with him
22 before.

23 Q I'm including emails and any other ways
24 that --

25 A No, ma'am.

1 Q -- you may have communicated.

2 A No, ma'am.

3 Q Okay. It's my understanding that Miles
4 Marthinsen had an issue with a polygraph when he was
5 hired.

6 A I have no knowledge of that.

7 Q Well, I'm unclear as to whether you were even
8 an administrator at that point in time. So that may
9 not have even been close to you.

10 Does the sheriff teach classes at FSU?

11 A He has in the past, yes, ma'am.

12 Q Does he do it now or currently?

13 A No, ma'am.

14 Q Okay. Is he planning to do it in the future?

15 A I don't know. You'll have to ask him that.

16 Q Okay. Did he do it last semester?

17 A No, ma'am, not that I'm aware of.

18 Q Do you know when the last time is that he did
19 that?

20 A No, ma'am. It's been -- I would -- I would
21 say years, but I couldn't tell you the last time.

22 Q Okay. Well in the past?

23 A Yes, ma'am.

24 Q Do you personally know Chas Galloway?

25 A No, ma'am.

1 Q Ever met him to your knowledge?

2 A I believe I may. I think I saw him in a
3 Starbucks one time years ago, but that was just, you
4 know, in passing. I've never formally talked with him.

5 Q Okay. Was ever there any discussion of the
6 fact that he claimed that his iPad had been stolen in
7 this case and swore it out under oath?

8 A I've never had a conversation with him.

9 Q Or anybody internally at the sheriff's office
10 had a discussion about him filing a false police
11 report?

12 A I don't -- I'm not aware of any of that.

13 Q Do you personally know Jason Cook?

14 A Yes, ma'am.

15 Q How do you know him?

16 A Just professionally, him being -- you know,
17 working as IT for the board and seeing him at board
18 meetings.

19 Q Do you usually attend board meetings?

20 A I haven't been in several years, no, ma'am.

21 Q Was there a -- did you used to attend it as
22 part of your duties?

23 A Yes, ma'am. I -- when I first came to this
24 position and -- you know, building relationships with
25 the county administration and commissioners, I would --

1 I would attend it more often, but I haven't in recent
2 time.

3 Q Okay. When about were you doing those
4 meetings, how close in time to now?

5 A Maybe -- 2021 -- maybe '24, '25.

6 Q Do you know why there was this focus on Donna
7 Johns?

8 A No, ma'am.

9 Q To your knowledge, does she have a good
10 relationship with the sheriff?

11 A Yes, ma'am.

12 Q A good relationship with you?

13 A Yes, ma'am. Yeah. I worked with her very
14 well.

15 Q Okay. Oh. Do you know Teresa Lowery? I'm
16 sorry. I skipped over her.

17 A Yes, ma'am.

18 Q How do you know her?

19 A She's Commissioner Dan Glidewell's executive
20 aide. And I've dealt with her when I'm scheduling a
21 meeting with the commissioner.

22 Q Okay. Are you aware she's currently suing
23 the County?

24 A I read that in the local paper, yes, ma'am.

25 Q Okay. Were you -- do you know why she -- I

1 think I may have asked you this earlier. But do you
2 know why she had her lawsuit served on Danny
3 Glidewell's office?

4 A No, ma'am. I have no idea.

5 Q Let me just double-check one other thing.
6 Nobody's called you on behalf of the County
7 to, like, give a statement or anything like that with
8 the civil case?

9 A No, ma'am.

10 Q Okay. To your knowledge, has anybody ever
11 talked to them?

12 A No, ma'am.

13 Q Have you read the response or the motion to
14 dismiss filed by the County?

15 A No, ma'am.

16 Q I wouldn't expect that you did. I'm just
17 asking in case.

18 Did you have any involvement in selecting the
19 charges that were given over to FDLE to investigate?

20 A No, ma'am.

21 Q Okay. Did you have any discussion as to
22 elements of those charges with the State Attorney's
23 Office?

24 A No, ma'am.

25 Q Okay. Have you ever charged this

1 "trespassing into computer systems" charge in your
2 career as a deputy?

3 A No, ma'am.

4 Q Have you ever charged a 934 violation or
5 investigative one in your career as a deputy?

6 A Not to my knowledge.

7 Q Would you have read the statutes before you
8 charged somebody with those?

9 A Yes, ma'am.

10 Q Did you read the statutes prior to sending
11 those to FDLE?

12 A No, ma'am.

13 MS. BOGENSCHUTZ: So that's all I have. And
14 I'll cede it to Mr. Mitchell if he's got anything
15 to follow up with.

16 THE WITNESS: Thank you.

17 MR. MITCHELL: I don't think I do have any
18 questions.

19 You have the right to read or waive.

20 MS. BOGENSCHUTZ: Yeah. I can -- yeah.
21 That's -- yeah. Feel free to go through that with
22 him.

23 MR. MITCHELL: Yeah. So you can trust that
24 the court reporter's going to type down what you
25 said, your responses, accurately. If there's

1 anything inaccurate -- you can't change your
2 answer, but if there's inaccuracies in your
3 answer, then you can do an Errata Sheet, and we'll
4 go back through it, or you can waive that.

5 And it's really up to you. If you want to
6 read it, you'll probably need to give the court
7 reporter, like, an email address.

8 THE COURT REPORTER: Right.

9 THE WITNESS: I can waive it.

10 MR. MITCHELL: Okay. He said he waived,
11 Court Reporter.

12 THE COURT REPORTER: Okay. Thank you.

13 And did you want this transcribed, Kathleen?

14 MS. BOGENSCHUTZ: I would.

15 I actually have one other -- I'm sorry. I
16 think I'm still sharing my screen.

17 BY MS. BOGENSCHUTZ:

18 Q This screen that I'm showing you, 12/14 of
19 '23, says Robertson and Turner met with you and Chief
20 Rowell?

21 A Yes, ma'am. There was others in the room as
22 well.

23 Q Okay. Did they offer you the iPad on this
24 date?

25 A No, ma'am.

1 Q Did they have the iPad with them on this
2 date?

3 A I don't --

4 Q If you remember.

5 A -- remember.

6 Q I know.

7 A Yeah. I do not, no, ma'am.

8 Q Okay. And they were requesting that you
9 reopen an investigation into Chas Galloway; right?

10 A Yes, ma'am.

11 Q And you decided not to?

12 A I did not make that decision.

13 Q Did someone make a decision as to that?

14 A I believe that was part of Investigator
15 Marthinsen's investigation, initial investigation.

16 Q Okay. So you think that was kind of ceded to
17 Marthinsen with the rest of this?

18 A Yes, ma'am.

19 MS. BOGENSCHUTZ: Okay. I think that's all I
20 have. Sorry. I had it pulled up for a reason and
21 I'm getting tired.

22 THE COURT REPORTER: Okay. So Kathleen
23 ordered the original. Did you want a copy,
24 Mr. Mitchell?

25 MR. MITCHELL: Yes, ma'am.

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(Witness excused.)

(The witness waived reading and signing, and
the deposition was concluded at 5:22 p.m.)

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CERTIFICATE OF OATH

STATE OF FLORIDA)
COUNTY OF ST. JOHNS)

I, Karen Adair Ruiz, Registered Merit Reporter, Notary Public, State of Florida, certify that DONALD CLARK appeared before me via Zoom videoconference and was sworn remotely on the 5th day of March, 2026.

WITNESS my hand and official seal this 17th day of March, 2026.

Karen Adair Ruiz

KAREN ADAIR RUIZ
Registered Merit Reporter

Personally Known:
OR Produced Identification: XX
Type of identification Produced: Florida driver's license

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CERTIFICATE OF REPORTER

STATE OF FLORIDA)
COUNTY OF ST. JOHNS)

I, Karen Adair Ruiz, Registered Merit Reporter, certify that I was authorized to and did stenographically report the deposition of DONALD CLARK, that a review of the transcript was not 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' attorneys or counsel connected with the action, nor am I financially interested in the action.

Dated this 17th day of March, 2026.

Karen Adair Ruiz

KAREN ADAIR RUIZ
Registered Merit Reporter

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