

1 MIAMI-DADE STATE ATTORNEY’S OFFICE  
2 PUBLIC CORRUPTION INVESTIGATION NUMBER:  
3 64-20-11

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6  
7 DATE: THURSDAY, SEPTEMBER 30<sup>TH</sup>, 2021  
8 TIMES: 9:00AM – 10:08AM  
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15 SWORN STATEMENT  
16 OF  
17 ABIGAIL MACIVER  
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APPEARANCES:

ON BEHALF OF THE STATE:

BY: Tim VanderGiesen, Assistant State Attorney

1350 N.W. 12<sup>th</sup> Avenue

Miami, Florida 33136

(305) 547-0100

ALSO PRESENT:

- SAO Investigator Robert Fielder; Office of the Miami-Dade State Attorney
- Detective Frank Castillo; Office of the Miami Dade State Attorney Public Corruption Task Force

ON BEHALF OF THE WITNESS:

- Adam Komisar, Esquire
- Will Spicola, Esquire

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1 PROCEEDINGS

2 [Beginning of statement 9:01AM]

3 Whereupon,

4 **Abigail Faith Maciver.,**

5 Been first duly sworn, was called as a witness and was examined and testified as follows:

6 DIRECT EXAMINATION

7 ASA VanderGiesen: Sorry, let me make sure my emails and everything are  
8 closed, because we're using my computer, so let me close everything so we don't get interrupted.  
9 And if I hang up on you, Puja, I will get back on.

10 Court Reporter Shah: Sounds good.

11 ASA VanderGiesen: I think everything is closed. Let me know if you have any  
12 problem hearing, Pooja. You're not going to be looking right at her. I need to be able to see.

13 Court Reporter Shah: No, that's fine. As long as I can hear, and you guys are  
14 coming through clear.

15 ASA VanderGiesen: Okay, thank you.

16 Court Reporter Shah: We're all set.

17 **By ASA VanderGiesen:**

18 Q. All right. Would you please give us your full name, ma'am?

19 A. Abigail Faith Maciever.

20 Q. Where do you currently live?

21 A. As in an address? 4534 High Grove Place in Tallahassee, Florida.

22 Q. High Grove?

23 A. Mm-hmm (affirmative).

24 Q. Is that one word?

25 A. Sure.

1 Q. It is or is not?

2 A. Honestly, it's done both ways.

3 Q. Okay. What's your highest level of education?

4 A. Undergraduate degree.

5 Q. From where?

6 A. University of Central Florida.

7 Q. What specialty?

8 A. Political science and international relations.

9 Q. Ma'am, you understand that you've been served with a subpoena from the State  
10 Attorney's Office in Miami to appear today?

11 A. Mm-hmm (affirmative).

12 Q. Is that a yes?

13 A. Yes.

14 Q. You understand this is being recorded?

15 A. Yes.

16 Q. Okay. What that means is you have to answer yes or no, or we need you to do  
17 your best to answer yes or no. Uh-huh (affirmative) and uh-uh (negative) don't transcribe well. I  
18 understand what they mean in this room, but when I read the transcript later, I won't be able to  
19 tell yes versus no. So, I know that's how we have talked every day. If you find me correcting  
20 you, it happens with every witness, so we'll just do our best. If a question calls for a yes or no  
21 answer with an explanation, you can say yes or no, and then explain it. Okay?

22 A. Okay.

23 Q. Did you bring anybody with you today?

24 A. My two attorneys.

25 Q. All right, and what are their names?

1 A. Adam Komisar and Will Spicola.

2 Q. Without telling me what you guys talked about, have you had ample opportunity  
3 to talk to them prior to coming here today?

4 A. Yes.

5 Q. Prior to us getting started with the substance of the questioning, would you like  
6 any more time to talk to them privately?

7 A. Not right now.

8 Q. Okay. If at any time during this interview you would like to take a break and  
9 speak to them privately, that opportunity will be afforded to you. You understand?

10 A. Yes.

11 Q. Even if it's about a question, if I ask a question and you have a concern about it,  
12 you can say, "Can I have a break to talk to my attorneys?" We'll give you the room. Puja's the  
13 person recording it. We'll make sure it's not being recorded, and you'll be able to speak privately  
14 with them. You understand that?

15 A. Sure, yes.

16 Q. Okay. Do you understand what it means to be under subpoena today?

17 A. Only from what has been explained to me by my lawyers.

18 Q. Okay. Without telling me what they told you, tell me what you understand it to  
19 mean.

20 A. That you all are requiring me to come and provide a statement to you.

21 Q. Okay. You understand that a State Attorney subpoena, such as the one that we  
22 served on you, means you're being compelled to be here today?

23 A. Yes.

24 Q. All right. Do you understand that, that means you are required by law to answer  
25 our questions?

1 A. Yes.

2 Q. All right. Now, there are a few exceptions. You're not required to tell us  
3 conversations between you and your attorneys. That's called attorney/client privilege. You  
4 understand that?

5 A. Yes.

6 Q. Okay. And there may be some other privilege that I'm not anticipating, but if your  
7 attorneys bring it up, we may have to hash it out during the course of this interview. But I think  
8 probably for the most part, I'm not going to ask you any questions that will require you to tell me  
9 what you and your attorneys talked about. Okay?

10 A. Okay.

11 Q. Other than that, you're required by law to answer my questions. If you feel that  
12 you shouldn't have to answer the question, your attorneys can tell me that. If I agree, I may  
13 agree. If I don't agree, then we may have to litigate it later, but I think for the most part, you're  
14 required to answer my questions. Okay?

15 A. Mm-hmm (affirmative).

16 Q. What that means is, is that you have something called immunity. It's called use  
17 immunity, which means that if I ask you a question that requires you to respond with an answer  
18 that implicates you in some sort of wrongdoing, like criminal wrongdoing, you are immune. So, I  
19 can't turn around and then be like, "Oh, Ms. Maciver admitted to me that she did X, now I'm  
20 going to charge her with this based on her statement." You're immune, so you have every  
21 incentive to be truthful with me about what I ask you. The exceptions to that are you don't have  
22 what's called transactional immunity, meaning whatever I already know or whatever I found out  
23 independent of speaking with you, I can still use against you. You understand that?

24 A. Yes.

25 Q. Okay. This is Detective Castillo. He's with us, so don't be alarmed. He came with

1 us. You understand that we don't have any sort of deal between us where no matter what you say  
2 you have immunity? It's only immunity for the subpoena. Do you understand that?

3 A. Yes.

4 Q. Okay. Did I say that clearly and is that your understanding based on what you've  
5 discussed with your attorneys?

6 A. Yes.

7 Q. Okay. Would you like any more time to speak with them about that?

8 A. No.

9 Q. Okay. One other caveat I sometimes explain to people is that use immunity also  
10 includes derivative use immunity, which means that ... First of all, I'm not suggesting that you're  
11 going to admit that you committed a crime, but this is the same thing, if you read all the  
12 statements I ever take, I tell every witness this, because I want to make sure that they understand  
13 the truth is the best course here.

14 If you acknowledge to me that you did something to help somebody in the furtherance of  
15 a crime, derivative use of immunity means I can't also use that to go find more evidence and then  
16 use that evidence against you. So, it's use and derivative use. Does that make sense?

17 A. Yes.

18 Q. Okay. The caveat to all this is that if you lie to us about something that's material  
19 and relevant to our investigation, you can be prosecuted for perjury. Do you understand what that  
20 means?

21 A. Yes.

22 Q. Okay. The civics lesson here is you can't get in trouble for answering my  
23 questions truthfully, but you can get in trouble for answering them falsely, knowingly doing that.  
24 Does that make sense?

25 A. Yes.



1 Q. Okay. I'm going to ask your attorneys if they are satisfied with our colloquy so  
2 far, if they would like to ask you any other questions just to make sure it's clear on the record  
3 how we're situated today. You gentlemen have anything else you want to add?

4 Attorney Komisar: We're satisfied. If you could just confirm with her that she's  
5 not allowed to plead the Fifth on any individual questions? Let's just make that very clear.

6 **By ASA VanderGiesen:**

7 Q. I think that, that's what I've explained to you, is that because you get immunity,  
8 you don't get the Fifth Amendment privilege. Okay? But again, if there is an attorney/client  
9 privilege or some sort of privilege that I'm not anticipating, it's not no limit. There are some  
10 things that your attorneys may be able to object to, which we would have to either litigate or I  
11 would agree that, that's privileged. But what your attorney is saying is that because you get  
12 immunity, you can't refuse to respond to my questions, unless it fits some other legal exception.  
13 Does that make sense?

14 A. Yes.

15 Q. It all makes sense, guys?

16 Attorney Komisar: Yes.

17 **By ASA VanderGiesen:**

18 Q. Okay. I try to say it in a commonsense way, because I know as a lawyer, it can be  
19 complicated the way we say it. If you tell the truth, I think that's the best course for us today. All  
20 right? Where do you currently work?

21 A. A company called Canopy Partners.

22 Q. And what's your position there?

23 A. I'm one of the partners.

24 Q. And how many partners are there?

25 A. Three.

1 Q. Who are the other partners?

2 A. Jeff Pitts and Dan Newman.

3 Q. And what business is Canopy Partners in?

4 A. Consulting and public affairs.

5 Q. What kind of consulting?

6 A. It varies depending on what a specific client may want, but political consulting,  
7 issue management, crisis communications, general public affairs.

8 Q. How long has Canopy Partners been in business?

9 A. We formed the LLC at the end of December, but formally started working at the  
10 company January 1.

11 Q. Of this year?

12 A. Mm-hmm (affirmative).

13 Q. Is that a yes?

14 A. Yes. Sorry.

15 Q. That's all right. Where were you at prior to employment at Canopy Partners?

16 A. I worked for Matrix LLC.

17 Q. And what is Matrix LLC?

18 A. A consulting firm.

19 Q. All right. And who are the owners or partners of Matrix LLC?

20 A. Joe Perkins.

21 Q. He's the sole owner?

22 A. Yup. Yes.

23 Q. And what did you do for Mr. Perkins at that company?

24 A. Various consulting, similar to what I do now with Canopy.

25 Q. Can you give me an example of what you would do for a client now, more than

1 just the general consulting? You don't have to disclose a specific client or anything like that, but  
2 just give me an example like, "A client could call me and ask me to do this."

3 A. A client could call me and ask me to ... A lot of what we do is just truly public  
4 affairs, communications management. Right now, I'm working on a ballot initiative.

5 Q. Okay.

6 A. So, I help run a ballot initiative campaign.

7 Q. All right. And are clients, are they candidates for office? Are they political  
8 committees? Are they nonprofits? What kind of clients would be interested in your services?

9 A. I do not work for candidates. However, Canopy does have some candidate work  
10 that they do through one of my other partners, but I don't do any work for candidates.

11 Q. Are you currently affiliated with any other companies other than Canopy  
12 Partners?

13 A. I have my own LLC.

14 Q. What's that called.

15 A. The Metis Group.

16 Q. M-E-T-I-S?

17 A. Mm-hmm (affirmative).

18 Q. Yes?

19 A. Yes.

20 Q. How long has the Metis Group been in business?

21 A. 2015.

22 Q. Are there any other partners, members, co-owners?

23 A. No.

24 Q. It's completely you?

25 A. It's all me.

1 Q. Always? It's always been that way?

2 A. Yes.

3 Q. When did you graduate from college?

4 A. I took a very long route, so I don't know, 2011, 2012. I finished my degree while I  
5 was working.

6 Q. Okay. What specifically does the Metis Group do?

7 A. Consulting, similar to what I do through other companies, just separate and apart  
8 from clients.

9 Q. Why do you need both Canopy Partners and the Metis Group?

10 A. If I'm doing work that is maybe not directly related to what Canopy Partners was  
11 doing. Granted, Metis Group was also already in existence. I don't really do any real work  
12 through Metis Group now. Now everything runs through Canopy. But previous, when I was  
13 working at Matrix, I did more work through Metis Group.

14 Q. How did you come to be partners with Mr. Pitts and Mr. Newman?

15 A. Jeff Pitts was the CEO and President of, I think was his title of Matrix, he was my  
16 boss at Matrix. Dan Newman was a consultant that we worked with on a number of different  
17 projects over a period of years. We just got along and decided that we'd start Canopy Partners.

18 Q. Have you ever heard of an organization called Let's Preserve the American  
19 Dream?

20 A. Yes.

21 Q. What if any relationship, do you have with that organization?

22 A. I've done work with that organization.

23 Q. What kind of work have you done for them?

24 A. Consulting.

25 Q. Okay. What have you consulted on?

1           A.     I mean a variety of different things. Usually, it has to do with some sort of  
2 research. It varies.

3           Q.     Can you tell me what kind of research it is? Is it research relating to issue and  
4 crisis management? Is it political consulting? What type of research do you do for them?

5           A.     It would depend on the specific instance. I don't do a consistent ... I'm not a  
6 retainer for them, so I just take on nominal projects.

7           Q.     Okay. Give me an example of a type of project you would do.

8           A.     It could have to do with political research. It could have to do with issue research.  
9 I've done a number of various different projects with them over the years.

10          Q.     What is the most recent time that you worked with Let's Preserve The American  
11 Dream?

12          A.     I'm working with Let's Preserve the American Dream now.

13          Q.     Okay, on what project?

14          A.     Do I have to ... A ballot initiative.

15          Q.     You can tell me just generally to start with, and if I think it's relevant ... This is  
16 not an investigation into the politics of one person or the other, so we're not necessarily seeking  
17 to find out about clients, and specific type of ballot stuff at this stage, unless we think it's  
18 relevant to what our real concern is. If you want to give me those type of answers, that's fine,  
19 that's really all I wanted to know at this point.

20          A.     Okay.

21          Q.     How do they pay you?

22          A.     They are currently paying me through a retainer with one of Canopy's LLCs. We  
23 have a subsidiary LLC, Game Day Strategies.

24          Q.     What's that? What is it?

25          A.     Game Day Strategies.

1 Q. How did you describe it, an affiliated LLC?

2 A. Yeah, it's a wholly owned.

3 Q. Completely owned by Canopy?

4 A. Mm-hmm (affirmative).

5 Q. Yes?

6 A. Yes.

7 Q. Is anybody else associated with Game Day Strategies, other than Mr. Pitts, and  
8 Mr. Newman, and yourself?

9 A. Game Day Strategies, I'm the only person on Game Day Strategies, but it is  
10 wholly owned by Canopy.

11 Q. Why do you need to do business through Game Day Strategies if you do business  
12 with Canopy?

13 A. Just for different purposes for different clients, depending on what the project is.

14 Q. But I mean for what purpose? What would be the purpose of needing to get paid  
15 as Game Day, as opposed to getting paid as Canopy?

16 A. Largely it's management of projects, or specific types of projects. Game Day  
17 Strategies is more of the ... I don't know how to describe it. Canopy is like our general  
18 consulting, and Game Day is something that we would do maybe something slightly more  
19 publicly political through, instead of through Canopy.

20 Q. It's part of the way you guys structure your business, you like to keep it separate  
21 for that, because of the particular type of work they may be doing. Is that a yes?

22 A. Yes.

23 Q. Okay. Just so I understand. Do you know a person named Ryan Tyson?

24 A. Yes.

25 Q. How do you know Ryan Tyson?

1 A. I've worked in and around Ryan Tyson for the last number of years.

2 Q. What does Ryan Tyson do?

3 A. He does research and polling. He's also I think the Executive Director, I don't  
4 know if that's actually his title, of Let's Preserve the American Dream.

5 Q. Is he the contact person for you and your company at Let's Preserve The  
6 American Dream, Ryan Tyson?

7 A. Yes.

8 Q. Is there anybody else with Let's Preserve the American Dream that you guys deal  
9 with?

10 A. Erika Alba is the attorney for Let's Preserve the American Dream, I think. We  
11 would do a contract agreement for services.

12 Q. Do you know what particular business is Let's Preserve the American Dream in?

13 A. It's a 501(c)(4) organization.

14 Q. Okay, my understanding is that's a tax designation.

15 A. Mm-hmm (affirmative).

16 Q. Right?

17 A. Yes.

18 Q. Do you agree that, that's what that means?

19 A. Yes.

20 Q. Okay. So, what business do they do? Because that would indicate that they're in a  
21 social service business. Do you know what their social service objectives are?

22 A. I don't know officially, whatever their mission statement, I don't know off the top  
23 of my head what their mission statement is.

24 Q. Okay. Are any of the companies that you're affiliated with, Canopy, Game Day,  
25 Metis, are any of those registered as a nonprofit?

1 A. No.

2 Q. Those are all for profit companies?

3 A. Yes.

4 Q. Okay. How did you come to know that Let's Preserve The American Dream is a  
5 501(c) whatever you said, (4) or (3).

6 A. I just have always known that.

7 Q. How do you know that?

8 A. I don't know.

9 Q. Do they get a deal? Do they have to pay taxes when they pay you? What causes  
10 you to ... Is it related to the business you do with them? Because I'm just curious as to ... Is it  
11 Let's Preserve the American Dream Inc. (c)(4)? Is it in their name? What causes it to be known?

12 A. I think just their general existence. I mean they publicly do activities. I just know  
13 them as a 501(c)(4) organization.

14 Q. What activities do they do publicly?

15 A. Usually research, public polling.

16 Q. I think I misunderstood. When you say they do research publicly, you mean they  
17 do research and release it to the public, or they do polling of the public for their interests? Do  
18 you understand the difference in the question I'm asking? When you first said they do public  
19 stuff, I thought you were talking about nonprofit type of work, but it sounded to me like the  
20 question was more like they ask questions of the public for their own purposes. Which one are  
21 you explaining to me, or am I really off base?

22 A. I think that they do both. They definitely do release publicly, they poll various  
23 issues, and political candidates, and issues, and release it publicly.

24 Q. Do they release it publicly because they have an interest in the public good, or  
25 because they're advocating and supporting a specific position?



1 A. I don't know.

2 Q. Okay. Okay. What information do you recall them releasing to the public?

3 A. I feel like he releases a decent amount of stuff to the public. I don't recall off the  
4 top of my head.

5 Q. He meaning Ryan Tyson?

6 A. Mm-hmm (affirmative).

7 Q. Yes?

8 A. Yes.

9 Q. Okay. Do you know anybody else, besides him and Ms. Alba, that are affiliated  
10 with Let's Preserve the American Dream?

11 A. I know that they have a Board of Directors. I don't know who all sits on that  
12 Board of Directors right now.

13 Q. Anybody else that works there or consults with them?

14 A. I know people who, I mean I think from ... Well, I don't know that actually. I don't  
15 know what agencies consulted for them. Yeah, I do know various different people who might  
16 work on projects with me.

17 Q. Okay, could you give me their names?

18 A. Alex Alvarado.

19 Q. Okay.

20 A. And I'm forgetting Eric's last name.

21 Q. Falcon?

22 A. Yes, Falcon.

23 Q. That's okay.

24 A. I think that they ... I might be totally wrong.

25 Q. Okay. Have you ever worked with either one, Mr. Alvarado or Mr. Falcon, in

1 relationship to something you were doing for Let's Preserve The American Dream?

2 A. Now that you're asking that, I actually don't know if they work for Let's Preserve  
3 the American Dream.

4 Q. No, I think I said that.

5 A. Oh, okay.

6 Q. You originally said you knew them to have done work somehow associated with  
7 it. What I'm asking is have you ever done work with Let's Preserve The American Dream where  
8 they were also involved in some way?

9 A. Yes, but I don't know that it was specifically ... Like their role in specifically Let's  
10 Preserve the American Dream, versus working on something else, something like a polling  
11 person, that maybe was not actually Let's Preserve The American Dream.

12 Q. Okay. Do you know a person named Richard Alexander?

13 A. No.

14 Q. Have you ever heard of an organization called Proclivity?

15 A. Yes.

16 Q. Have you ever heard of an organization called Grow United?

17 A. Yes.

18 Q. Can you please start with Proclivity, tell me how you've heard of Proclivity?

19 A. I know that it's a 501(c)(4) organization.

20 Q. How do you know that?

21 A. Through some of the folks that I work with.

22 Q. Okay. Who told you that?

23 A. Jeff Pitts, I believe possibly.

24 Q. You believe possibly. Can you tell me with what certainty you're giving me that  
25 name?

1           A.     Honestly, I don't have a lot of awareness of Proclivity, and so I don't recall  
2 specifically if he was the one who relayed that to me, or someone else did.

3           Q.     Okay. Do you recall how they happened to tell you or why did they happen to tell  
4 you about Proclivity, and why it was relevant that it was a (c)(4)?

5           A.     I thought that Proclivity was making a contribution to a political committee.

6           Q.     Why did you think that?

7           A.     Because I had some awareness of conversations that had happened. I was not  
8 directly involved in the conversations.

9           Q.     Okay. What conversations are we talking about?

10          A.     Around contributions being made to a political committee.

11          Q.     But involving who?

12          A.     Jeff.

13          Q.     Anybody else?

14          A.     Ryan, from Let's Preserve the American Dream, maybe. April Odom, who works  
15 for us as a contractor.

16          Q.     Does she have her own company?

17          A.     Yes.

18          Q.     Do you know the name of it?

19          A.     I do not.

20          Q.     Okay.

21          A.     Off the top of my head.

22          Q.     You guys contract with her?

23          A.     Yeah. I just can't remember. Off the top of my head, I don't recollect what her  
24 company name was.

25          Q.     Is it Odom?

1 A. Yes.

2 Q. Let's try and understand better, you recall that there was some sort of conversation  
3 that involved Ryan Tyson, Jeff Pitts, and April Odom. Was this conversation with everybody in  
4 the same room?

5 A. No.

6 Q. How did the conversation take place?

7 A. I don't know, I wasn't involved in the conversation.

8 Q. Okay, so the conversation was ... Somebody told you afterwards that, that  
9 conversation was had?

10 A. Somebody told me that ... Honestly, I don't recollect entirely how the train of  
11 awareness for me was. I just was aware that there was some contributions. Specific conversations  
12 or how they happened, I don't fully know.

13 Q. Do you know specifically where the contributions were made to?

14 A. I don't recollect the name of the political committees off the top of my head.

15 Q. Do you remember if Mr. Alvarado was involved in these events?

16 A. He was involved in the political committee discussions.

17 Q. Were those discussions relayed to you also, or were you involved in those  
18 discussions?

19 A. He had reached out to me at one point and asked me if I could help him get the  
20 contact information for the organization that had made contributions to the political committee.

21 Q. Okay. Let me show you ... Puja, I'm going to put Exhibit A and Exhibit B, and I'll  
22 give these to you when we get back.

23 Court Reporter Shah: Okay.

24 **By ASA VanderGiesen:**

25 Q. I'm going to show them to the witness. If you want to show them to your

1 attorneys, that's fine also. Do you recognize the texts that are in Exhibit A and B that I put in  
2 front of you?

3 **[Whereupon Exhibit A and B were entered into the record]**

4 A. They look like text messages between me and Alex.

5 Q. Okay. It looks like that those texts, they're dated in what month and of what year?

6 A. October of last year.

7 Q. Do you recall what your phone number was in October of last year?

8 A. It's the same as it is now.

9 Q. Which is what?

10 A. ██████████6400.

11 Q. Is that the number that you would have used to send those texts?

12 A. Yes.

13 Q. Do you use an app, or do you send them just via regular text?

14 A. Regular text.

15 Q. Do you still have those texts?

16 A. I doubt it. I don't keep text messages very frequently.

17 Q. How do you delete them?

18 A. I just periodically delete them, or else it just becomes too many text messages.

19 Q. Were there any other conversations between you and Alex Alvarado or you and  
20 anyone else that led to those texts being sent?

21 A. To Alex sending me a text?

22 Q. Any conversations between you and Alex or you and anybody, that led to those  
23 texts?

24 A. No.

25 Q. How does the conversation start when you're discussing Proclivity in those texts?

1 A. He asked me for the (c)(4) information.

2 Q. What specifically did he say though?

3 A. "Get me (c)(4) info when possible, please."

4 Q. Were other conversations had, or did you automatically know what that was in  
5 reference to?

6 A. I knew what it was in reference to.

7 Q. How did you know?

8 A. Just general awareness.

9 Q. Okay. Was that the only matter you were dealing with in October of last year that  
10 dealt with (c)(4)s?

11 A. I don't know. I honestly don't know.

12 Q. How often, if we had your records, how often would we see that you  
13 communicated with Alex on that?

14 A. It's varied. It depends on whether we're working on something together and I have  
15 a specific reason to chat with him.

16 Q. What about in October of last year, were you chatting with him on a regular  
17 basis?

18 A. It depends, maybe. We may have been working on other things that we would  
19 have been talking about.

20 Q. What I'm getting at is that I haven't understood your testimony to seem to indicate  
21 that you recall being involved in a lot of conversations dealing with Proclivity. You haven't  
22 testified that you had a lot of conversation with Alex Alvarado, but there is text messages that  
23 seem to assume or presume facts that are known to everybody. Do you follow what I'm asking?  
24 You're saying, "I think I remember Jeff telling me something about a (c)(4)." You have a text in  
25 front of you where Alex Alvarado asked you for the information on a (c)(4), but there seems to

1 me to be a gap between in your knowledge. How did you know, based on what you've told me,  
2 what Alex Alvarado would have been asking you for?

3 A. Because I knew that there were contributions being made to Proclivity by a (c)(4).  
4 That was my general awareness.

5 Q. Where did you get the specific information on Proclivity?

6 A. I asked possibly Jeff or possibly April for it.

7 Q. How would we narrow down who asked?

8 A. I don't know, ask them?

9 Q. Okay, we should talk to them.

10 A. I mean honestly, I don't know.

11 Q. Okay. I understand that we should talk to Jeff and we should talk to April, but  
12 would it be in a text message somewhere or an email?

13 A. I don't know. I don't know if I would have texted, or called, or emailed them for it.

14 Q. Do they know Alex Alvarado?

15 A. Yes. I don't know if April knows Alex Alvarado, but I know Jeff knows Alex  
16 Alvarado.

17 Q. Why would you think that April would have had the specific information on  
18 Proclivity?

19 A. Because she and Jeff were the ones that had the relationship with Proclivity.

20 Q. What relationship did they have?

21 A. I don't know.

22 Q. Was Proclivity a client of theirs?

23 A. I don't know.

24 Q. They would know if I asked them, right?

25 A. I would presume.

1 Q. As a partner, you don't know all the clients that your other partners have? I'm  
2 sorry, you weren't partners at the time, right?

3 A. Yeah, correct.

4 Q. All right. What was April doing or who was she working with in October of last  
5 year, that she would have been in the loop regarding these events?

6 A. She was a contractor for Matrix, but she also has her own business.

7 Q. She contracted for Matrix, and she contracts with you guys now?

8 A. Mm-hmm (affirmative).

9 Q. Yes?

10 A. Yes.

11 Q. Okay. What is her specialty?

12 A. She has a background in communications. She worked in local government for a  
13 very long time in Alabama, and she has a lot of relationships there, and does communications,  
14 and project management, I guess.

15 Q. Did you ever have any conversations with anybody where you discussed the  
16 details of how much money that those texts were in reference to, or what specific candidates or  
17 committees the money went to?

18 A. I don't think so, but I don't know.

19 Q. How would you not know?

20 A. Just because it was a year ago, and I just don't know if I could possibly have had  
21 or tangentially been aware of conversations. I just don't know.

22 Q. Are you aware, as you sit here today, that, that political committee or that (c)(4)  
23 ended up not being the organization that sent the money?

24 A. Yes.

25 Q. How do you know that as you sit here today?



1           A.     I found out after the fact there was a number of different things that happened,  
2 that got reported, that it wasn't the correct organization.

3           Q.     Like what?

4           A.     What do you mean like what?

5           Q.     You said you found out after the fact, what did you find out?

6           A.     I mean I know that there was at least one article about it. I don't remember if that  
7 was the order of which we found out, or if there was notice ahead of time. I don't remember.

8           Q.     All right, so you indicated earlier that you heard of Grow United?

9           A.     Yes.

10          Q.     How have you heard of Grow United?

11          A.     It was another 501(c)(4) that I had awareness of.

12          Q.     What was your awareness?

13          A.     Similar to Proclivity.

14          Q.     Which was what?

15          A.     Just general awareness that there was some activity and some work being done  
16 with them.

17          Q.     By who?

18          A.     Jeff and April.

19          Q.     Jeff and April?

20          A.     Mm-hmm (affirmative).

21          Q.     You knew that at the time that all these events were taking place, you knew that  
22 you had that information last year in October?

23          A.     I mean I tangentially knew. I was not directly involved in any of it, like as regular  
24 communications.

25          Q.     But you're not suggesting that you found out that through the news, you were

1 aware last year, you had heard last year of Grow United?

2 A. Yes.

3 Q. Okay. Did you understand them to be a client of Jeff Pitts?

4 A. I don't know.

5 Q. Or April?

6 A. I don't know.

7 Q. Do you recall any conversations about any money being sent to Grow United or  
8 coming from Grow United?

9 A. Not that I was directly involved in.

10 Q. Do you know a person named Haley Defilippis?

11 A. No.

12 Q. Do you know a person named Andrea Roca?

13 A. No.

14 Q. Do you know a person named Sierra Olive?

15 A. No.

16 **SAO Investigator Fielder:** Do you mind if I go back to a couple of things?

17 ASA VanderGiesen: Yeah, go ahead. I've got to find something else.

18 **By SAO Investigator Fielder:**

19 Q. You spoke about Erika Alba.

20 A. Yes.

21 Q. Do you know, does she work for a law firm?

22 A. She does.

23 Q. For which firm is that?

24 A. Foley & Lardner.

25 Q. Do you know somebody by the name of Tammy Elser?

1 A. No.

2 **By ASA VanderGiesen:**

3 Q. Do you know an organization called Ardent Strategies?

4 A. Yes.

5 Q. Who's that?

6 A. That's April Odom.

7 Q. Do you know what the focus is, what business the Ardent Strategies focuses on?

8 A. No.

9 Q. Where would we find April Odom? Is she in Tallahassee?

10 A. No, she lives in Alabama.

11 Q. Oh, okay. So, when –

12 **By SAO Investigator Fielder:**

13 Q. I was going to say, did she also use the last name [Alday] if you know?

14 A. No.

15 Q. No?

16 A. No.

17 **By ASA VanderGiesen:**

18 Q. You indicated you don't know the name Richard Alexander, right?

19 A. I didn't say that. I said I don't know Richard Alexander.

20 Q. Oh, I'm sorry if I asked ... I thought I asked it a different way. Do you know the  
21 name Richard Alexander?

22 A. I do.

23 Q. Do you know it other than reading it in the media?

24 A. I didn't know it until reading it in the media.

25 Q. Okay, so you had not heard of the name Richard Alexander last year?

1 A. If it had ever been mentioned around me, it wasn't something that I had awareness  
2 of.

3 Q. Have you talked, other than your lawyers, have you talked to anybody about the  
4 fact that you were going to come in today and give us a statement?

5 A. The people at my office know.

6 Q. Okay, how many people?

7 A. Everyone who was there when F.D.L.E. knocked on the door.

8 Q. Where was that? Was Jeff Pitts there?

9 A. He was.

10 Q. He's aware you're here right now?

11 A. Yes.

12 Q. What about Dan Newman?

13 A. Yes.

14 Q. Are you aware that we reached out to speak to Dan Newman?

15 A. No.

16 Q. He didn't tell you that?

17 A. No.

18 Q. Who else in the office would know that you're here today?

19 A. The young lady who works for us at the office and answered the door.

20 Q. What was her name?

21 A. Mary Summers, but I don't know that she knows I'm here today. She knew that it  
22 happened.

23 Q. Other than your attorneys, have you talked to anybody about what we were going  
24 to discuss today?

25 A. No.

1 Q. You didn't talk to Jeff Pitts about what this is about?

2 A. I mean I didn't know what it was about.

3 Q. You didn't realize that this was probably related to all the stuff you've read in the  
4 media?

5 A. I thought maybe it possibly was, but I wasn't sure.

6 Q. What else could it have been, just out of curiosity?

7 A. I assumed maybe it had to do with the stuff in the media, but I had no idea.

8 Q. Okay. Have you received any subpoenas from the Miami-Dade State Attorney's  
9 Office in recent years, to give statements?

10 A. No.

11 Q. What about any other State Attorneys' offices?

12 A. No.

13 Q. Okay. I'm going to ask you then, what in your mind could it have possibly been,  
14 other than this?

15 A. Honestly, I wasn't sure.

16 Q. Okay. Then you didn't have occasion ... If I bring in Jeff Pitts and I ask him  
17 whether or not you and him discussed what we were going to discuss today, he'll say the same  
18 thing, "No."

19 A. I'm not certain in that in detail.

20 Q. Well, what short of not in detail did you guys discuss?

21 A. I mean he had awareness that it happened, and it was like, "Well, what would this  
22 be about?"

23 Q. Anybody else outside of those three people, other than your attorneys, that you  
24 discussed-

25 A. My husband knows I'm here.

1 Q. Other than your husband?

2 A. No.

3 Q. Do you know a company called ABCM LLC?

4 A. No.

5 Q. The Truth Political Committee?

6 A. I've heard of it, yes.

7 Q. Did you hear of it through the media, or you know of it through prior to this?

8 A. I think I knew that, that was the name of a political committee before the media.

9 Q. How would you have known that?

10 A. Because it was involved in one of the political committees that I was involved in,  
11 some of the donations that were made.

12 Q. You would have known this around October of last year?

13 A. I mean if you had asked me then what the name of a political committee was, I  
14 don't know that I would have known it, but I'm sure if it was mentioned.

15 Q. Did you see any paperwork that reflected a financial transaction? Did you see, or  
16 were you provided, or were you privy to how the money was transferred around, where the  
17 money originated?

18 A. No.

19 Q. That it ended up at The Truth, or it ended up somewhere else, were you privy to  
20 anything like that?

21 A. No.

22 Q. Do you have any authority to make those decisions or to authorize those  
23 transfers?

24 A. No.

25 Q. To your knowledge, does Jeff Pitts or Dan Newman have any authority to

1 authorize transfers from Grow United to political committees in Florida?

2 A. Not to my knowledge.

3 Q. When April Odom consults with your companies, does she consult on Florida  
4 matters, or Alabama matters?

5 A. Both.

6 Q. Both?

7 A. Mm-hmm (affirmative).

8 Q. You guys do business in Alabama also?

9 A. Not really so much anymore.

10 Q. Our Florida political committee, have you heard of that?

11 A. Yes.

12 Q. In the media, or prior to that?

13 A. Same as with The Truth. I'm more familiar with it now because of the media, but  
14 I'm sure that I had awareness of its name prior to that.

15 Q. Do you know Frank Artiles?

16 A. I do not.

17 Q. Have you ever heard the name?

18 A. Of course.

19 Q. All right. Prior to the last year, did you know who he was?

20 A. Yes.

21 Q. How did you know?

22 A. He was a member of the House of Representatives.

23 Q. Did you know him as a member of the House of Representatives, or you just  
24 knew the name because you live in Tallahassee and you're in sort of that circle?

25 A. I worked for an organization, and I worked at the Capitol, and so he was in the

1 House of Representatives when I worked for a former organization where I had more direct  
2 engagement with elected officials.

3 Q. Do you know what work Frank Artiles does for Let's Preserve the American  
4 Dream?

5 A. No.

6 Q. Do you know why they pay him \$5,000 a month?

7 A. No.

8 Q. Okay. The Florida Democratic Party, I'm sure you've probably heard of that,  
9 right?

10 A. Yes.

11 Q. Sorry, because we're creating a transcript, I still have to ask the obvious. Inversion  
12 Strategies, have you heard of that?

13 A. No.

14 Q. Okay. Florida Promise?

15 A. Yes.

16 Q. What's that?

17 A. It's a 501(c)(4) organization.

18 Q. Okay, and how do you know it's a 501(c)(4)?

19 A. I've done some work for them in the past.

20 Q. What is their social welfare purpose?

21 A. I don't know.

22 Q. Do you understand why I ask the question about social welfare?

23 A. No.

24 Q. Are you aware of the significance of being a 501(c)(4) as a tax designation?

25 A. Yes.



1 Q. And it indicates that you're a not for profit, right?

2 A. Yes.

3 Q. Are you familiar with the fact that there are certain requirements of such an  
4 organization by law?

5 A. Yes.

6 Q. One of them I believe, I'm not an expert in tax law, is that they're supposed to be  
7 what's called social welfare organization. That's why I asked the question do you happen to know  
8 what their social welfare, does that make sense?

9 A. Yes.

10 Q. Okay, because you seem to know that a lot of these organizations are (c)(4)s, so I  
11 just wondered if you were going to tell me, "Oh no, they feed the homeless," or they do some  
12 other social welfare that you're aware of. I'm just asking if you're aware of it.

13 A. I don't know everything that they do.

14 Q. Okay. That's why I ask it, I just want to make sure there's not confusion about it,  
15 because it does seem to be something, you're aware of. Have you ever heard of an organization  
16 or a person named Deves Toon?

17 A. Yes.

18 Q. What is that?

19 A. It's a person.

20 Q. It's a person?

21 A. Mm-hmm (affirmative).

22 Q. Okay. Is that somebody in your industry, or do you know who that is?

23 A. I know who it is.

24 Q. Who is it?

25 A. I don't know what his title is, but he works for the National Action Network, and I

1 guess he's consulted with us before.

2 Q. Where is he out of?

3 A. I don't know. Jacksonville perhaps?

4 Q. Is he affiliated with Foley & Lardner or anything?

5 A. No, not that I'm aware of.

6 Q. What's National Action Network?

7 A. That's an organization run by a national African American pastor whose name I  
8 can't remember right now.

9 Q. No, it's okay.

10 A. It's like a national African American interest organization.

11 Q. Is it political?

12 A. I would say they're in that (c)(4) realm, where they're kind of on the outskirts of  
13 politics, Al Sharpton.

14 Q. Oh, okay.

15 A. That's Al Sharpton's organization.

16 Q. You've done work with them?

17 A. I have not done work with them specifically.

18 Q. Oh, you indicated Mr. Toon does.

19 A. Yes, Mr. Toon does.

20 Q. Okay. People Over Profits, have you heard of that?

21 A. Yes.

22 Q. What is that?

23 A. It's a 501(c)(4) organization.

24 Q. That seems to be a common designation. Is that something that's common in your  
25 business?

1 A. Yes.

2 Q. Is there an understanding about what those are supposed to be for in this industry?

3 A. Yes.

4 Q. What is the understanding?

5 A. That they are organizations that operate, like you said, in the public interest, but  
6 they're not typically specifically advocating like any electioneering. Basically, no electioneering.

7 They can operate on issues, typically issues, they can't support candidates around issues. I

8 worked for a large nonprofit 501(c)(4), so that's where most of my knowledge base comes from.

9 Q. Okay.

10 A. But they don't specifically electioneer.

11 Q. Okay. Direct Action Fund, did I ask about that one?

12 A. No.

13 Q. Do you know what that is?

14 A. No.

15 Q. Project 68 Inc., have you ever heard of that?

16 A. Yes.

17 Q. What's that?

18 A. It's I think a 501(c)(4). I don't actually know if that's a 501(c)(4) or not.

19 Q. Have you ever heard of a (c)(4) or a political committee called D.A.M., like  
20 D.A.M.?

21 A. No.

22 Q. What about People for a Better Miami-Dade?

23 A. People for a Better Miami-Dade?

24 Q. Mm-hmm (affirmative).

25 A. I've heard of A Better Miami-Dade.

1 Q. Oh, it's A Better Miami-Dade?

2 A. Yeah.

3 Q. Okay. Are you familiar with who operates that?

4 A. No.

5 Q. A (c)(4) again?

6 A. Yes?

7 Q. I'm just asking, it was a question.

8 A. I think it is. I don't know.

9 Q. Okay. Florida Watch Inc., have you heard of that?

10 A. I have.

11 Q. Do you know who that is or who's affiliated with it?

12 A. If you told me their names, I could tell you, but I'm not directly affiliated with  
13 them, so I just don't have an awareness, but I do know of them.

14 Q. Wingman?

15 A. No, never heard of it.

16 Q. Okay.

17 **By SAO Investigator Fielder:**

18 Q. You mentioned Matrix, is that a Florida corporation?

19 A. Alabama, I believe.

20 Q. Alabama. Do you remember the people who work there?

21 A. Now?

22 Q. Mm-hmm (affirmative).

23 A. Before I -?

24 Q. How about when you were there? How many is that?

25 A. Myself, between a dozen and 20 maybe, I don't know.

1 Q. Okay. Game Day Strategies, you spoke about that. When I checked that in  
2 SunBiz, there's two separate ones that come up, do you know about that? They seem to be the  
3 same, but they have different ID numbers.

4 A. Game Day Strategies, we incorporated in Delaware, and we haven't filed as a  
5 foreign corporation here.

6 Q. Right.

7 A. I'm not sure why there would be two with two different EINs.

8 Q. No, there's two separate ones do the exact same thing, Florida corporations, but  
9 then it refers to the managers of Game Day Holdings. Are you familiar with that?

10 A. Yes.

11 Q. Okay, what is that?

12 A. Because of the way that they made us do the foreign filing, that was the way we  
13 set it up.

14 Q. Okay, so that was a function of doing the foreign corporation?

15 A. Yeah.

16 Q. Okay.

17 **By ASA VanderGiesen:**

18 Q. Proclivity purports to have a PO box in Atlanta, and the person who we believe  
19 runs it is in Alabama, and we believe they may have donated money to Our Florida, to a couple  
20 of Florida political committees. Do you know, based on your knowledge and experience, why all  
21 that would be necessary? Why would a company in Alabama need a PO box in Atlanta, and give  
22 money to Florida campaigns?

23 A. I don't know why it was set up that way.

24 Q. Grow United, again, purports to be run by a person in Alabama, I believe their PO  
25 box is in Denver, and they did give money, \$550,000, or they moved \$550,000 to two Florida

1 political committees. Based on your knowledge and experience, can you offer an opinion as to  
2 why that's necessary?

3 A. No.

4 Q. If I told you that the money that went through Grow United and went into Our  
5 Truth, or The Truth and Our Florida, but that money originated with Let's Preserve the American  
6 Dream, so Let's Preserve the American Dream transferred several hundred thousand dollars to  
7 Grow United, who then in turn transferred it back to the political committees that were run by  
8 Alex Alvarado, could you offer me an opinion, based on your knowledge and experience, as to  
9 why that's necessary?

10 A. No.

11 Q. Is there any legitimate reason that you can think of, as we sit here today, that, that  
12 would be done? You can take a few moments to think about it.

13 A. I wasn't involved in any of the discussions with those decisions, and how those  
14 contributions or expenditures were made, so I just can't speculate.

15 Q. But you seem to be very familiar with (c)(4)s?

16 A. Mm-hmm (affirmative).

17 Q. You do political consulting. I just wondered-

18 A. I mean frequently people donate to (c)(4)s to protect their identity. That's a very  
19 common purpose for why people would donate to a (c)(4).

20 Q. Okay.

21 **By SAO Investigator Fielder:**

22 Q. When you talked to Alex Alvarado, did you ever talk to him about his forming  
23 PCs, how he does it, or what his strategy is?

24 A. No.

25 Q. Have you ever done that? Have you ever set up a PC, or anybody in your

1 company?

2 A. I have set up a PC before.

3 Q. Okay. Is there any formula to who you pick to be the Chairperson and the  
4 Treasurer?

5 A. I mean each political committee is going to have their own reasons for why they  
6 would choose different people.

7 Q. What are some of those reasons? I'll tell you why I'm asking. The ones we're  
8 familiar with seem to pick people that have absolutely nothing to do with it. They don't  
9 participate in the operation, and they don't have access to the bank accounts, even though they're  
10 the Treasurer. Do you have any explanation of why people do that?

11 A. No.

12 Q. Is that kind of a common thing that happens? Have you ever heard of that?

13 A. I don't know.

14 Q. Okay. Has Alex Alvarez ever discussed that with you at all?

15 ASA VanderGiesen: Alvarado.

16 **By SAO Investigator Fielder:**

17 Q. I'm sorry, Alvarado.

18 A. No.

19 Q. Do you recall any discussion coming up, whether it was relayed to you by your  
20 partner, Mr. Pitts, whether it was with Mr. Alvarado, or Mr. Tyson, explaining why they were  
21 spending \$550,000 to support two straw candidates in Miami-Dade County?

22 A. I don't know that I was involved in any of those conversations. I remember I was  
23 so kind of like on the outside of those conversations, I don't totally recollect how much detail I  
24 really had, as much as I had details, of why anything was formed.

25 **By ASA VanderGiesen:**

1 Q. But we would agree with certainty, based on the fact that you were asked to track  
2 down the origination of that, somebody in your company definitely was involved in these events,  
3 right? Otherwise, there would be no reason to text or call you for this information. Is that fair to  
4 say?

5 A. Right.

6 Q. All right. They didn't randomly reach out to you, like it was because somebody  
7 that you're affiliated with was in the loop?

8 A. Right.

9 Q. Okay. Other than Mr. Pitts or Ms. Odom, was there anybody else, any names that  
10 we haven't discussed, that could be a person or people involved in those events?

11 A. No, not that I know of. Could there have been other people? Sure, but not that I  
12 know of.

13 Q. Is there any reason why they would, in forming a political committee, use  
14 addresses that could not be traced back to them? Do you know of any legitimate reason why  
15 people would do that?

16 A. I don't know that, that's a specific goal. I mean we very commonly will use post  
17 office boxes or UPS stores, when we need to have a specific address when we're forming a  
18 political committee or an LLC.

19 Q. How long have you lived in Tallahassee?

20 A. I was born here, and I've lived here most of my life, but I have lived other places.

21 Q. But you went to college somewhere else, right?

22 A. Mm-hmm (affirmative).

23 Q. How long have you been back here since college?

24 A. Ten years back, at the end of 2010.

25 Q. How many political committees have you helped set up since then?



1 A. I don't know, a couple.

2 Q. Did you use addresses locally that would be affiliated with you, or did you use  
3 addresses out of county?

4 A. At least one is out of county that I can think of.

5 Q. Why was that then?

6 A. Because that's where the Treasurer is located.

7 Q. Okay. Did you use the Treasurer's address?

8 A. No, we used a UPS box.

9 Q. Okay. Did you put the Treasurer's name on the box?

10 A. I don't know. I think she actually set it up, so I don't know whose name is on the  
11 box, or if it's just the committee's name on the box.

12 Q. Okay. Did you accurately report the financial institutions that you used for the  
13 political committees?

14 A. Yes.

15 Q. You did?

16 A. I mean I wasn't the one reporting, but whoever the Treasurer is, I'm sure would  
17 accurately report. I don't do any political committee reports.

18 **By SAO Investigator Fielder:**

19 Q. I think we're just asking just kind of in general, we're not targeting what you did.

20 A. Right.

21 Q. We're trying to understand who comes up with these schemes where they keep  
22 people that apparently have nothing to do with any of the paperwork they use. In our case, what  
23 we think are misleading PO boxes that don't lead to anybody. We're just trying to find out who  
24 came up with this kind of system of doing things, but you can't offer anything on that?

25 A. I mean as far as the P.O. Boxes goes, that's a very common practice for when

1 you're creating [crosstalk].

2 Q. Right. There's nothing wrong with that, but some of the ones we've looked at,  
3 looked into, the people that are listed as the Chairperson or the Treasurer don't have any  
4 operation duties, other than having their name on it. Now, for instance, the ones that you set up,  
5 did your Treasurer actually fill out the campaign reports?

6 A. Yes.

7 Q. They did, okay. I assume there's probably a lot of them like that.

8 A. I presume, I don't know who, I mean them, whoever. Different political  
9 committees operate differently.

10 Q. Okay, I understood you.

11 A. Yeah.

12 **By ASA VanderGiesen:**

13 Q. Do you know a company called 96 Consulting?

14 A. I think so.

15 Q. A guy by the name of Ryan Smith?

16 A. I do know Ryan Smith.

17 Q. Do you know what he does for a living?

18 A. Communications and political consulting.

19 Q. Do you know who he's affiliated with? Do you know anybody that he's affiliated  
20 with?

21 A. He works with a political, I don't know if he's a political consultant,  
22 communications guy out of South Florida, that's all I know [inaudible].

23 Q. Who is that guy?

24 A. Tom McNichols.

25 Q. Do you know a company called Preservation Association Management?

1 A. I do.

2 Q. What is that?

3 A. Ryan Smith.

4 Q. And Alvarado Strategies?

5 A. That's Alex Alvarado, I assume.

6 Q. Did you do any work last year that was tied to the Senate 37 or Senate 39 political  
7 races in South Florida?

8 A. I don't think so.

9 Q. What about Senate 9 in Seminole County?

10 A. No, I don't think so.

11 ASA VanderGiesen: Anything else?

12 **By SAO Investigator Fielder:**

13 Q. A company called Public Concepts?

14 A. Yes.

15 Q. Who are they?

16 A. They're a political consulting firm out of South Florida.

17 Q. Do you have names of anybody you have contracted with?

18 A. Rich Johnston and Randy Nielsen, from Public Concepts.

19 Q. Have you done any work for them lately?

20 A. No.

21 Q. Let me correct that, in the 2020 general election period, did you work for them at  
22 all?

23 A. Yes.

24 Q. What kind of work did you do?

25 A. We shared various projects; it just depends.

1 Q. What were the projects there?

2 A. I worked on a few different types of projects with them, and we actually have a  
3 few mutual clients that we do work for.

4 **By ASA VanderGiesen:**

5 Q. Without telling us your clients, can you be more specific? Do you do polling for  
6 somebody? Do you do ... I don't know this industry.

7 A. We'll collaborate, yeah, we'll collaborate on polling, we'll collaborate on research,  
8 we'll collaborate on strategy.

9 Q. Okay.

10 **By SAO Investigator Fielder:**

11 Q. Was there any mention by them about opening up a P.C. on any of these projects?

12 A. I don't know. Not that I ... I don't think so.

13 **By ASA VanderGiesen:**

14 Q. Are any of the people that we spoke about today, in addition to doing projects  
15 together, close friends? Is Ryan Tyson close friend with Jeff Pitts? Are you close friends with  
16 Alex Alvarado? Are you aware of outside or inside ... I realize in your own company, you may  
17 be friends, but are any of the people in different companies also socially friendly?

18 A. I mean I would say we're all socially friendly. We work relatively closely together  
19 on a lot of different things over a period of years.

20 Q. Do you guys go to dinner together?

21 A. Yes, typically work-related dinners.

22 Q. Lunches?

23 A. Yeah.

24 Q. Meet with clients together?

25 A. Right.

1 Q. Okay. Have all of your answers today been truthful to the best of your  
2 knowledge?

3 A. Yeah.

4 Q. Is there anything that you would like to clarify or change about your answers,  
5 now that you've had a little bit more time to think about the questions?

6 A. Not that I can think of.

7 Q. Okay. Have you been given the opportunity to answer all of our questions?

8 A. Yes.

9 Q. Is there anything that you think that we should know about the questions that we  
10 asked, that we didn't ask the right question, or anything that you think, regardless of who it  
11 benefits, anything that you think that we need to know?

12 A. No.

13 Q. Okay, I'm not suggesting ... Sometimes when we're done, some people are like, "I  
14 don't understand why you didn't ask me this." I'll be like, "Well, that's related to all the same  
15 stuff." I'm just trying to give witnesses the opportunity to explain something if they're sitting  
16 there thinking, "Man, are they going to ask me about this?" I'm not suggesting that, that exists.

17 ASA VanderGiesen: All right, Puja, that will conclude the statement for today.  
18 Thank you.

19 [End of statement 10:08AM]

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1 REPORTER’S CERTIFICATE

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3 I, Puja Shah, hereby certify that the foregoing transcript consisting of 46  
4 transcript pages, is a complete true, and accurate transcript of the testimony  
5 indicated, held on Thursday, September 30<sup>th</sup>, 2021 via the Miami-Dade State  
6 Attorney’s Virtual Zoom software, E.R. Graham Building, 1350 N.W. 12<sup>th</sup>  
7 Avenue, Miami, Florida, 33136. Sworn Statement of Abigail Faith Maciver.  
8 Investigation Number: 64-20-11.

9

10 I further certify that this proceeding was reported by Puja Shah, and that the  
11 foregoing transcript has been prepared by me.

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Date: October 22<sup>nd</sup> 2021

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Puja Shah

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Hearings’ Reporter

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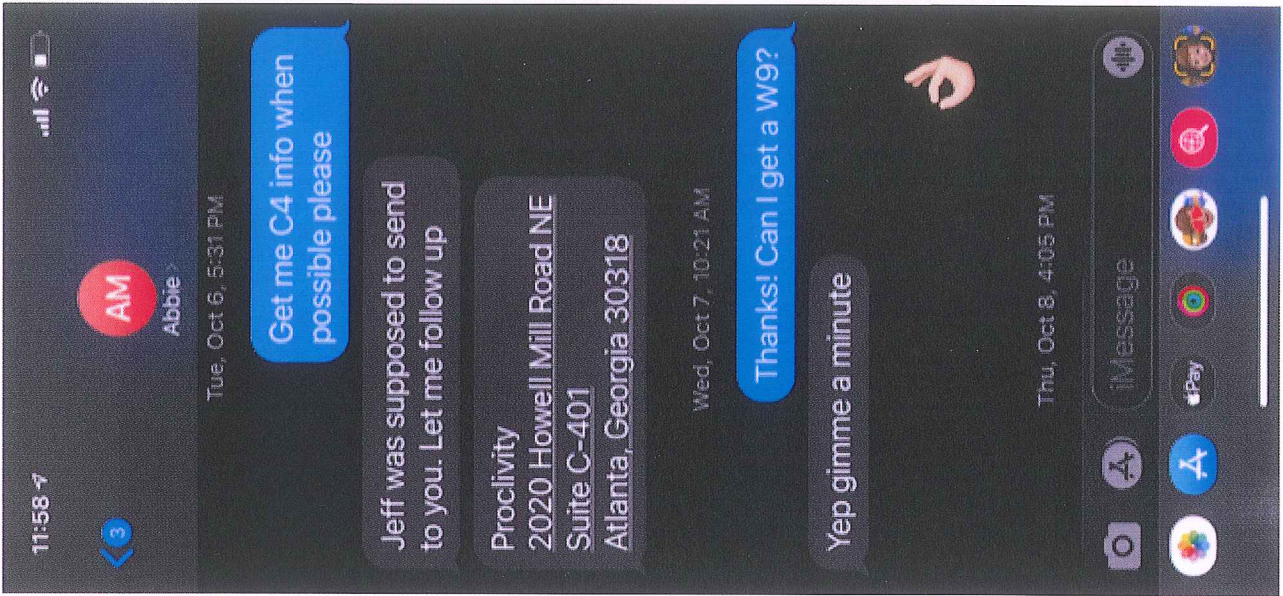
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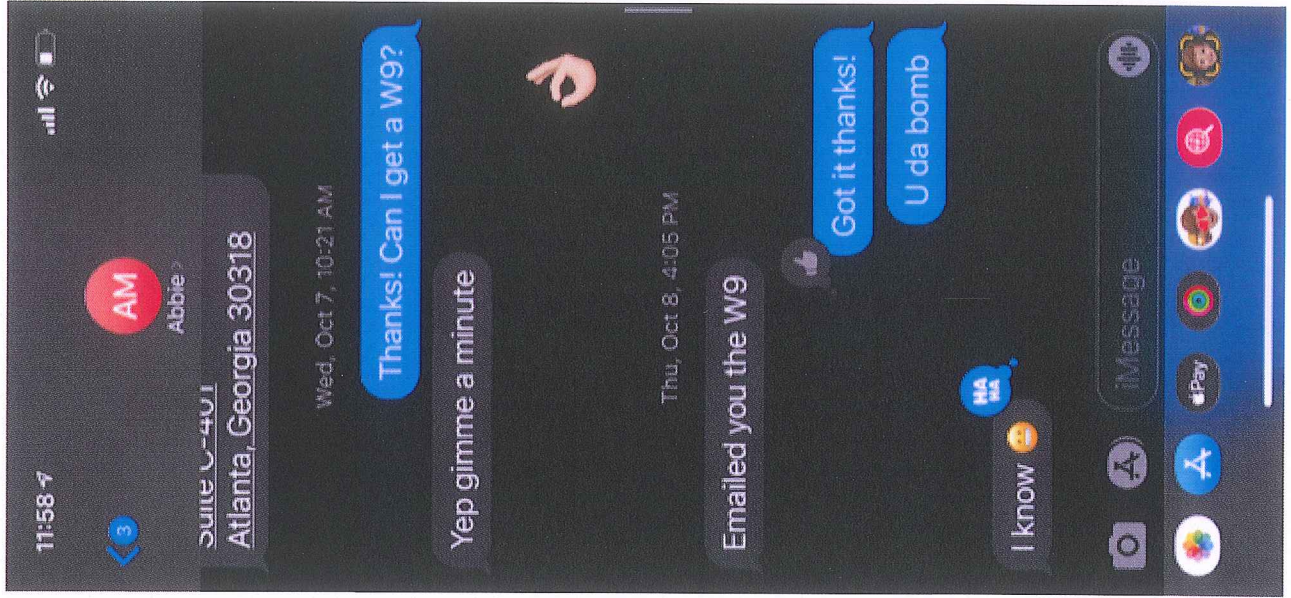
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