

Page 1

BEFORE THE STATE OF FLORIDA
DIVISION OF ADMINISTRATIVE HEARINGS
CASE NOS.: 14-1398BID, 14-1399BID 14-1400BID, 14-1425BID,
14-1426BID, 14-1428BID

PINNACLE RIO, LLC,
Petitioner,
vs.
FLORIDA HOUSING FINANCE
CORPORATION,
Respondent,
and
ALLAPATTAH TRACE APARTMENTS,
LTD.,
Intervenor.

DEPOSITION OF
JORGE CORDOVES
Taken on behalf of the Intervenor

April 17, 2014
3:01 p.m. - 3:15 p.m.
4210 Laguna Street
Coral Gables, Florida

Examination of the witness taken before:
I. Iris Cooper, CSR
United Reporting, Inc.
1218 S.E. 3rd Avenue
Fort Lauderdale, Florida 33316
954-525-2221

Page 2

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Page 3

I N D E X

1 2 WITNESS 3 JORGE CORDOVES 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25	PAGE Direct Examination by Mr. Glazer 4 EXHIBITS INTERVENOR'S EXHIBIT DESCRIPTION PAGE 1 Jorge Cordoves curriculum vitae 4 2 11-06-14 Stearns Weaver letter 6 3 11 x 17 map 7
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Page 4

1 -----
2 JORGE CORDOVES,
3 was called as a witness and, having been first
4 duly sworn, was examined and testified as follows:
5 THE WITNESS: I will.
6 DIRECT EXAMINATION
7 BY MR. GLAZER:
8 **Q Mr. Cordoves, would you please state your name
9 and your business address.**
10 A My name is Felix J. Cordoves. My business
11 address is 4210 Laguna Street, Coral Gables, Florida
12 33136.
13 **Q Mr. Cordoves, who do you work for?**
14 A I work for Corwil Architects.
15 **Q Do you have a title?**
16 A Yes. I am vice president of the company.
17 (Intervenor's Exhibit No. 1 was marked for
18 identification.)
19 BY MR. GLAZER:
20 **Q Mr. Cordoves, we have marked a document as
21 deposition Exhibit No. 1. Is that a brief summary of
22 your education and work experience?**
23 A Yes, it is.
24 **Q And is it accurate?**
25 A For sure.

<p>Page 5</p> <p>1 Q And are you a licensed architect?</p> <p>2 A Do you want me to talk about?</p> <p>3 Q Yes.</p> <p>4 A My experience is about almost a half century.</p> <p>5 I was graduated to Cuba. After I got graduated, I was</p> <p>6 selected to be professor at the University of the School</p> <p>7 of Architecture in Havana, Cuba. After that, I was</p> <p>8 working in design and construction of low-income housing</p> <p>9 there.</p> <p>10 I built schools. I built industries like the</p> <p>11 Berliet plant in Muriel, several works there in Cuba.</p> <p>12 After that, I worked in Costa Rica for a year in</p> <p>13 low-income housing. After that, I came to Miami. No.</p> <p>14 Before that, I worked in low-income residences for a</p> <p>15 year in Rwanda Africa.</p> <p>16 After that, I came to the states, and I worked</p> <p>17 here. In the beginning, I was working in a construction</p> <p>18 company that was building the Joe Robbie Stadium. Now</p> <p>19 it's the -- I don't know.</p> <p>20 Q Football stadium?</p> <p>21 A Yes. It has so many names. I remember Joe</p> <p>22 Robbie Stadium is the first one.</p> <p>23 Q It's where the Dolphins play.</p> <p>24 A Yes. Then after that, I was working in the</p> <p>25 U.S. Virgin Islands as a product manager of a</p>	<p>Page 7</p> <p>1 Exhibit No. 2 is the package that was submitted to the</p> <p>2 City of Miami regarding the Allapattah Trace project?</p> <p>3 A Yes. We got it this and this, too. And we</p> <p>4 did this.</p> <p>5 MR. GLAZER: He's flipping through the pages.</p> <p>6 THE WITNESS: This was submitted.</p> <p>7 BY MR. GLAZER:</p> <p>8 Q This is the package?</p> <p>9 A Yes, it is.</p> <p>10 Q And I'm going to specifically refer you in</p> <p>11 this package to the forth page of the document, which is</p> <p>12 the site plan. Do you recognize that page?</p> <p>13 A Yes. It was done by us.</p> <p>14 (Intervenor's Exhibit No. 3 was marked for</p> <p>15 identification.)</p> <p>16 MR. GLAZER: And for everyone on the phone, we</p> <p>17 have marked as a deposition Exhibit No. 3, an 11 by</p> <p>18 17 version of that same document, just so that it's</p> <p>19 easier for us to refer to and read this afternoon.</p> <p>20 That is our Exhibit No. 3.</p> <p>21 BY MR. GLAZER:</p> <p>22 Q Mr. Cordoves, why was this site plan prepared?</p> <p>23 A This site plan was prepared with the intention</p> <p>24 to get approved the towing department the City of Miami</p> <p>25 to submit that to the FHA, the Florida Housing.</p>
<p>Page 6</p> <p>1 construction company building high, whatever, residences</p> <p>2 there for tourist vacation constructions. After that, I</p> <p>3 came to Miami and worked in several -- worked like</p> <p>4 custom residences, construction of the Freedom Tower.</p> <p>5 Since 2006 I am working here at Corwil</p> <p>6 Architects in residential and high rise residential</p> <p>7 construction and apartments for affordable housing and</p> <p>8 even for condominiums that wasn't so affordable.</p> <p>9 Q I think that's good. And are you familiar</p> <p>10 with a company called the Richmond Group of Florida?</p> <p>11 A Yes. We're working with them or for them like</p> <p>12 a couple of years ago.</p> <p>13 Q And are you familiar with a project that's</p> <p>14 known as Allapattah Trace Apartments?</p> <p>15 A Yes, for sure.</p> <p>16 (Intervenor's Exhibit No. 2 was marked for</p> <p>17 identification.)</p> <p>18 BY MR. GLAZER:</p> <p>19 Q I'm going to show you a document that's been</p> <p>20 marked as our deposition Exhibit No. 2.</p> <p>21 MR. GLAZER: And for people on the phone, this</p> <p>22 is the Stearns Weaver letter. It's a total of nine</p> <p>23 pages.</p> <p>24 BY MR. GLAZER:</p> <p>25 Q Mr. Cordoves, I'm going to ask you if this</p>	<p>Page 8</p> <p>1 BY MR. GLAZER:</p> <p>2 Q Florida Housing Finance?</p> <p>3 A Finance Corporation.</p> <p>4 Q And is this site plan that is Exhibit No. 3</p> <p>5 the site plan for the Allapattah Trace Apartments</p> <p>6 project?</p> <p>7 A Yes, it is.</p> <p>8 Q Briefly can you describe the site plan for us?</p> <p>9 A The site plan is an envelope of low income or</p> <p>10 affordable housing that it has 80 stories, and it's</p> <p>11 going to have --</p> <p>12 Q You said 80 stories?</p> <p>13 A Eight stories.</p> <p>14 Q Eight stories?</p> <p>15 A Eight stories and 77 units. It has on the</p> <p>16 lower floors two parking levels that is required for</p> <p>17 this kind of construction.</p> <p>18 Q And have you been to this site?</p> <p>19 A Yes, I have.</p> <p>20 Q And are there buildings currently on a part of</p> <p>21 this site?</p> <p>22 A Yes.</p> <p>23 Q And on the right-hand side of the site plan,</p> <p>24 there is a section called legal description. Do you see</p> <p>25 that?</p>

<p style="text-align: right;">Page 9</p> <p>1 A Yes.</p> <p>2 Q And there are certain lot numbers that are</p> <p>3 listed there. What are those?</p> <p>4 A This is the description from the property</p> <p>5 appraisal Dade County. It shows the lots that we're</p> <p>6 going to use. They are the lot from two to seven.</p> <p>7 Q On the left side?</p> <p>8 A On the east side of the property, there is a</p> <p>9 strip of land in between. There are two lots on the</p> <p>10 east side. The first one on the west, and the two ones,</p> <p>11 19 and 20, are on the east side.</p> <p>12 Q And where are the actual structures that make</p> <p>13 up the apartment complex on the west or the east?</p> <p>14 A These are going to be on the west side on lot</p> <p>15 two to seven, we are going to develop all the</p> <p>16 construction.</p> <p>17 Q You mentioned a strip of land that is between</p> <p>18 lots 2 through 7 and lots 19 and 20?</p> <p>19 A Yes.</p> <p>20 Q Are there any buildings on lots 19 and 20 on</p> <p>21 this site plan?</p> <p>22 A No, they are not. It's a vacancy lot.</p> <p>23 Q And is the strip of land included in the legal</p> <p>24 description that's on the right-hand side of the site</p> <p>25 plan?</p>	<p style="text-align: right;">Page 11</p> <p>1 see those?</p> <p>2 A Yes, I do.</p> <p>3 Q What are those pages?</p> <p>4 A These pages are from the Miami property</p> <p>5 appraisal. These are the records of the different</p> <p>6 properties, the different lots with a legal description,</p> <p>7 including the dimensions of the lot. We have in the</p> <p>8 first page -- do you want me to describe them?</p> <p>9 Q Just describe them generally. The document</p> <p>10 will be in the record, so you don't have to read each</p> <p>11 one.</p> <p>12 A This is legal description plus a photo of the</p> <p>13 -- aerial photo of the lots. And then you can see that</p> <p>14 the dimensions that we are using are exactly the</p> <p>15 dimensions that are in our calculations for the design</p> <p>16 of the building.</p> <p>17 Q On the site plan?</p> <p>18 A On the site plan.</p> <p>19 Q And on these additional pages from Miami-Dade</p> <p>20 County, is that strip of land included in the properties</p> <p>21 associated with each of those pages?</p> <p>22 A No. It's not included in any of the property</p> <p>23 legal description for any of the lots, even the one that</p> <p>24 are on the east and the one that is out in the left.</p> <p>25 They're not included in any of the property legal</p>
<p style="text-align: right;">Page 10</p> <p>1 A No. It is not inside of the 80 feet of the</p> <p>2 width of the lots 19 and 20. And even it's not included</p> <p>3 on the 144 feet of the lot 2 through 7.</p> <p>4 Q Two through seven?</p> <p>5 A Yes.</p> <p>6 Q Now, Mr. Cordoves, I want you to look in the</p> <p>7 upper left-hand corner of Exhibit No. 3. There is</p> <p>8 something called folio numbers. Do you see that?</p> <p>9 A Yes.</p> <p>10 Q And do those folio numbers relate to the lots</p> <p>11 that are in the legal description?</p> <p>12 A Completely. We got that from them.</p> <p>13 Q Do they overlap, the folio numbers and the lot</p> <p>14 numbers?</p> <p>15 A Yes. We got that description from the legal</p> <p>16 description. We did that calculation on all this</p> <p>17 information. It is based on the legal description of</p> <p>18 the property appraisal of the Miami-Dade County.</p> <p>19 Q And is the strip of land that is between lots</p> <p>20 2 through 7 and 19 and 20, is that strip of land</p> <p>21 included in these folio numbers?</p> <p>22 A Not at all.</p> <p>23 Q Turning back to Exhibit No. 2, after the site</p> <p>24 plan, there are five additional pages that look like</p> <p>25 they come from the Miami-Dade County website. Do you</p>	<p style="text-align: right;">Page 12</p> <p>1 descriptions.</p> <p>2 Q And finally, Mr. Cordoves, do you anticipate</p> <p>3 being in or within 100 miles of Tallahassee, Florida</p> <p>4 during the week of April 29, 2014?</p> <p>5 A No. I'm going to be like I don't know how</p> <p>6 many thousands of miles away. I'm not going to be</p> <p>7 there.</p> <p>8 MR. GLAZER: Thank you. I don't have any</p> <p>9 further questions right now. Let's see if anybody</p> <p>10 on the phone has any questions.</p> <p>11 MR. BROWN: This is Hugh Brown. I don't have</p> <p>12 any questions.</p> <p>13 MS. LONG: This is Brittany Long. I don't</p> <p>14 have any questions.</p> <p>15 MS. CHUMBLER: Marti Chumbler. I have no</p> <p>16 questions.</p> <p>17 MR. GLAZER: I think we're done then, and</p> <p>18 Mr. Cordoves will read. That's it folks. We're</p> <p>19 off the record.</p> <p>20 (Deposition concluded at 3:15 p.m.)</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>

CERTIFICATE OF OATH

STATE OF FLORIDA)
COUNTY OF MIAMI DADE)

I, I. Iris Cooper, Court Reporter and Notary Public, State of Florida, certify that JORGE CORDOVES personally appeared before me on the 17th day of April, 2014, and was duly sworn.

Signed this 24th day of April, 2014

[Signature of I. Iris Cooper]

I. Iris Cooper, CSR
Notary Public, State of Florida
My Commission No.: #FF010009
Commission Expires: April 21, 2017



ERRATA SHEET
DO NOT WRITE ON TRANSCRIPT - ENTER CHANGES ON THIS PAGE
IN RE: PINNACLE RIO vs. FLORIDA HOUSING FINANCE
JORGE CORDOVES
April 17, 2014

Table with 4 columns: Page No., Line No., Change, Reason. Contains multiple empty rows for corrections.

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

Date JORGE CORDOVES

CERTIFICATE OF REPORTER

STATE OF FLORIDA)
COUNTY OF MIAMI DADE)

I, I. Iris Cooper, Court Reporter and Notary Public for the State of Florida at Large, do hereby certify that I was authorized to and did stenographically report the video deposition of JORGE CORDOVES, pages 1 through 12; that a review of the transcript was requested; and that the transcript is a true 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 24th day of April, 2014.

[Signature of I. Iris Cooper]

I. Iris Cooper, CSR
Notary Public, State of Florida
My Commission No.: #FF010009
Commission Expires: April 21, 2017

WITNESS NOTIFICATION LETTER

April 24, 2014
JORGE CORDOVES
c/o Michael J. Glazer
Ausley McMullen
123 South Calhoun Street
Tallahassee, Florida 32301

IN RE: PINNACLE RIO vs. FLORIDA HOUSING FINANCE
Deposition taken on April 17, 2014
The transcript of the above proceeding is now available for your review.

If you are a party to this action and your attorney has ordered a copy of this transcript, you may wish to read his/her copy of the transcript. In that event, please execute the Errata Sheet, found at the back of the transcript, and return it to us for distribution.

Please complete your review within 30 days.

Very truly yours,

I. Iris Cooper, CSR
United Reporting, Inc.
1218 S.E. 3rd Avenue
Fort Lauderdale, Florida 33316
(954) 525-2221

CC via transcript:
Brittany Adams Long, Esq.

A	briefly 8:8 brittany 2:4 12:13 16:19 bronough 2:4,21 brown 2:21,23 12:11 12:11 building 5:18 6:1 11:16 buildings 8:20 9:20 built 5:10,10 burt 2:14 business 4:9,10	copy 16:9,9 coral 1:20 4:11 cordoves 1:16 3:2,7 4:2,8,10,13,20 6:25 7:22 10:6 12:2,18 13:6 14:9 15:2,24 16:2 corner 10:7 corporation 1:8 2:20 8:3 corwil 4:14 6:5 costa 5:12 counsel 14:13,15 county 9:5 10:18,25 11:20 13:3 14:4 couple 6:12 court 13:5 14:6 csr 1:23 13:12 14:19 16:14 cuba 5:5,7,11 currently 8:20 curriculum 3:7 custom 6:4	dont 5:19 11:10 12:5 12:8,11,13 duly 4:4 13:8	12:3 13:2,6,13 14:3 14:7,20 15:2 16:4,5 16:15 floridahousing 2:23 folio 10:8,10,13,21 folks 12:18 follows 4:4 football 5:20 foregoing 15:23 fort 1:24 16:15 forth 7:11 found 16:10 freedom 6:4 further 12:9 14:12
	C		E	
accurate 4:24 action 14:15,16 16:8 actual 9:12 adams 2:4 16:19 additional 10:24 11:19 address 4:9,11 administrative 1:2 aerial 11:13 affordable 6:7,8 8:10 africa 5:15 afternoon 7:19 ago 6:12 allapattah 1:11 6:14 7:2 8:5 anticipate 12:2 anybody 12:9 apartment 9:13 apartments 1:11 6:7 6:14 8:5 apc 2:2 appearances 2:1 appeared 13:7 appearing 2:2,8,13 2:19 appraisal 9:5 10:18 11:5 approved 7:24 april 1:19 12:4 13:7 13:9,14 14:17,21 15:3 16:2,6 architect 5:1 architects 4:14 6:6 architecture 5:7 associated 11:21 attorney 14:13 16:8 attorneys 14:14 ausley 2:9,12 16:3 authorized 14:8 available 16:7 avenue 1:24 16:15	c 16:3 calculation 10:16 calculations 11:15 calhoun 2:10 16:4 called 4:3 6:10 8:24 10:8 carlton 2:14 carltonfields 2:18 case 1:3 cc 16:18 center 2:13 century 5:4 certain 9:2 certificate 13:1 14:1 certify 13:6 14:7,12 cfjblaw 2:17 change 15:4 changes 15:1 chumbler 2:15 12:15 12:15 city 7:2,24 com 2:6,12,17,18 come 10:25 commission 13:13,14 14:20,21 company 4:16 5:18 6:1,10 complete 16:11 completely 10:12 complex 9:13 concluded 12:20 condominiums 6:8 connected 14:15 construction 5:8,17 6:1,4,7 8:17 9:16 constructions 6:2 cooper 1:23 13:5,12 14:6,19 16:14	d 3:1 dade 9:5 13:3 14:4 date 15:24 dated 14:17 day 13:7,9 14:17 days 16:11 declare 15:22 department 7:24 deposition 1:15 4:21 6:20 7:17 12:20 14:9 16:6 describe 8:8 11:8,9 description 3:6 8:24 9:4,24 10:11,15,16 10:17 11:6,12,23 descriptions 12:1 design 5:8 11:15 develop 9:15 different 11:5,6 dimensions 11:7,14 11:15 direct 3:3 4:6 distribution 16:10 division 1:2 document 4:20 6:19 7:11,18 11:9 15:23 dolphins 5:23	e 1:24 3:1 16:15 easier 7:19 east 9:8,10,11,13 11:24 education 4:22 eight 8:13,14,15 email 2:6,12,17,23 employee 14:13,14 enter 15:1 envelope 8:9 errata 15:1 16:10 esq 2:4,9,15,21 16:19 event 16:9 exactly 11:14 examination 1:22 3:3 4:6 examined 4:4 execute 16:10 exhibit 3:6 4:17,21 6:16,20 7:1,14,17 7:20 8:4 10:7,23 exhibits 3:5 experience 4:22 5:4 expires 13:14 14:21	floridahousing 2:23 folio 10:8,10,13,21 folks 12:18 follows 4:4 football 5:20 foregoing 15:23 fort 1:24 16:15 forth 7:11 found 16:10 freedom 6:4 further 12:9 14:12
B		D	F	G
back 10:23 16:10 balong 2:6 based 10:17 beginning 5:17 behalf 1:16 2:2,8,13 2:19 berliet 5:11 brief 4:21		d 3:1 dade 9:5 13:3 14:4 date 15:24 dated 14:17 day 13:7,9 14:17 days 16:11 declare 15:22 department 7:24 deposition 1:15 4:21 6:20 7:17 12:20 14:9 16:6 describe 8:8 11:8,9 description 3:6 8:24 9:4,24 10:11,15,16 10:17 11:6,12,23 descriptions 12:1 design 5:8 11:15 develop 9:15 different 11:5,6 dimensions 11:7,14 11:15 direct 3:3 4:6 distribution 16:10 division 1:2 document 4:20 6:19 7:11,18 11:9 15:23 dolphins 5:23	facts 15:23 familiar 6:9,13 fax 2:6,11,17,23 feet 10:1,3 felix 4:10 ff010009 13:13 14:20 fha 7:25 fields 2:14 finally 12:2 finance 1:8 2:20 8:2 8:3 15:2 16:5 financially 14:15 firm 2:3 first 4:3 5:22 9:10 11:8 five 10:24 flipping 7:5 floors 8:16 florida 1:1,8,20,24 2:5,10,16,19,20,22 4:11 6:10 7:25 8:2	gables 1:20 4:11 generally 11:9 glazer 2:9 3:3 4:7,19 6:18,21,24 7:5,7,16 7:21 8:1 12:8,17 16:3 going 6:19,25 7:10 8:11 9:6,14,15 12:5 12:6 good 6:9 graduated 5:5,5 group 6:10
				H
				h 2:15 half 5:4 havana 5:7 hearings 1:2 hes 7:5 high 6:1,6 housing 1:8 2:19,20 5:8,13 6:7 7:25 8:2 8:10 15:2 16:5 hugh 2:21,23 12:11
				I
				identification 4:18 6:17 7:15 ii 2:13 im 6:19,25 7:10 12:5 12:6 included 9:23 10:2 10:21 11:20,22,25 including 11:7 income 8:9 industries 5:10

information 10:17
inside 10:1
intention 7:23
interested 14:16
intervenor 1:13,16
 2:8
intervenors 3:5 4:17
 6:16 7:14
iris 1:23 13:5,12 14:6
 14:19 16:14
islands 5:25

J

j 2:9 4:10 16:3
joe 5:18,21
jorden 2:14
jorge 1:16 3:2,7 4:2
 13:6 14:9 15:2,24
 16:2

K

kind 8:17
know 5:19 12:5
known 6:14

L

laguna 1:20 4:11
land 9:9,17,23 10:19
 10:20 11:20
large 14:7
lauderdale 1:24
 16:15
law 2:3
left 9:7 11:24
lefthand 10:7
legal 8:24 9:23 10:11
 10:15,17 11:6,12
 11:23,25
letter 3:8 6:22 16:1
levels 8:16
licensed 5:1
line 15:4
listed 9:3
llc 1:5
long 2:4 12:13,13
 16:19
look 10:6,24
lot 9:2,6,14,22 10:3
 10:13 11:7
lots 9:5,9,18,18,20
 10:2,10,19 11:6,13
 11:23

low 8:9
lower 8:16
lowincome 5:8,13,14

M

m 1:19,19 12:20
manager 5:25
map 3:9
marked 4:17,20 6:16
 6:20 7:14,17
martha 2:15
marti 12:15
mchumbler 2:17
mcmullen 2:9 16:3
mdonaldson 2:18
mentioned 9:17
mglazer 2:12
miami 5:13 6:3 7:2
 7:24 11:4 13:3 14:4
miamidade 10:18,25
 11:19
michael 2:9 16:3
miles 12:3,6
monroe 2:15
muriel 5:11

N

n 3:1
name 4:8,10
names 5:21
nine 6:22
north 2:21
nos 1:3
notary 13:5,13 14:6
 14:20
notes 14:11
notification 16:1
numbers 9:2 10:8,10
 10:13,14,21

O

o 16:3
oath 13:1
ones 9:10
ordered 16:9
org 2:23
overlap 10:13

P

p 1:19,19 2:14 12:20
package 7:1,8,11
page 3:2,6 7:11,12

11:8 15:1,4
pages 6:23 7:5 10:24
 11:3,4,19,21 14:9

parking 8:16
part 8:20
parties 14:13,14
party 16:8
penalties 15:22
people 6:21
perjury 15:22
personally 13:7
petitioner 1:6
phase 2:13
phone 2:5,11,16,22
 6:21 7:16 12:10
photo 11:12,13
pinnacle 1:5 15:2
 16:5
plan 7:12,22,23 8:4,5
 8:8,9,23 9:21,25
 10:24 11:17,18
plant 5:11
play 5:23
please 4:8 16:9,11
plus 11:12
prepared 7:22,23
president 4:16
proceeding 16:7
product 5:25
professor 5:6
project 6:13 7:2 8:6
properties 11:6,20
property 9:4,8 10:18
 11:4,22,25
public 13:6,13 14:7
 14:20

Q

questions 12:9,10,12
 12:14,16

R

r 2:21
radey 2:3
radeylaw 2:6
read 7:19 11:10
 12:18 15:22 16:9
reason 15:4
recognize 7:12
record 11:10 12:19
 14:11
records 11:5

refer 7:10,19
regarding 7:2
relate 10:10
relative 14:12,14
remember 5:21
report 14:8
reporter 13:5 14:1,6
reporting 1:23 16:14
requested 14:10
required 8:16
residences 5:14 6:1,4
residential 6:6,6
respondent 1:9
return 16:10
review 14:10 16:7,11
rica 5:12
richmond 6:10
right 12:9
righthand 8:23 9:24
rio 1:5 15:2 16:5
rise 6:6
robbie 5:18,22
rwanda 5:15

S

s 1:24 5:25 16:15
school 5:6
schools 5:10
section 8:24
see 8:24 10:8 11:1,13
 12:9
selected 5:6
seven 9:6,15 10:4
sheet 15:1 16:10
show 6:19
shows 9:5
side 8:23 9:7,8,10,11
 9:14,24
signed 13:9
site 7:12,22,23 8:4,5
 8:8,9,18,21,23 9:21
 9:24 10:23 11:17
 11:18
south 2:4,10,15 16:4
specifically 7:10
stadium 5:18,20,22
state 1:1 4:8 13:2,6
 13:13 14:3,7,20
stated 15:23
states 5:16
stearns 3:8 6:22
stenographic 14:11

stenographically
 14:8
stories 8:10,12,13,14
 8:15
street 1:20 2:4,10,15
 2:21 4:11 16:4
strip 9:9,17,23 10:19
 10:20 11:20
structures 9:12
submit 7:25
submitted 7:1,6
suite 2:4,15,21
summary 4:21
sure 4:25 6:15
sworn 4:4 13:8

T

taken 1:16,22 16:6
talk 5:2
tallahassee 2:5,10,16
 2:22 12:3 16:4
telephonically 2:2,13
 2:19
testified 4:4
thank 12:8
thats 6:9,13,19 9:24
 12:18
theyre 11:25
think 6:9 12:17
thousands 12:6
title 4:15
total 6:22
tourist 6:2
tower 6:4
towing 7:24
town 2:13
trace 1:11 6:14 7:2
 8:5
transcript 14:10,11
 15:1 16:7,9,9,10,18
true 14:11 15:23
truly 16:12
turning 10:23
two 8:16 9:6,9,10,15
 10:4

U

u 5:25
united 1:23 16:14
units 8:15
university 5:6
upper 10:7

use 9:6	141400bid 1:3	8	
V	141425bid 1:3	80 8:10,12 10:1	
vacancy 9:22	141426bid 1:3	8502220398 2:17	
vacation 6:2	141428bid 1:3	8502227560 2:11	
version 7:18	144 10:3	8502241585 2:16	
vice 4:16	15 1:19 12:20	8502249115 2:11	
video 14:9	17 1:19 3:9 7:18 15:3	8504256654 2:5	
virgin 5:25	16:6	8504256694 2:6	
vitae 3:7	17th 13:7	8504884197 2:22	
vs 1:7 15:2 16:5	19 9:11,18,20 10:2,20	8504889809 2:23	
W	2	9	
want 5:2 10:6 11:8	2 3:8 6:16,20 7:1	954 16:16	
wasnt 6:8	9:18 10:3,20,23	9545252221 1:25	
weaver 3:8 6:22	20 9:11,18,20 10:2,20		
website 10:25	200 2:4		
week 12:4	2006 6:5		
west 9:10,13,14	2014 1:19 12:4 13:8,9		
width 10:2	14:17 15:3 16:2,6		
wish 16:9	2017 13:14 14:21		
witness 1:22 3:2 4:3	21 13:14 14:21		
4:5 7:6 16:1	215 2:15		
work 4:13,14,22	227 2:21		
worked 5:12,14,16	24 16:2		
6:3,3	24th 13:9 14:17		
working 5:8,17,24	29 12:4		
6:5,11	3		
works 5:11	3 1:19,19 3:9 7:14,17		
write 15:1	7:20 8:4 10:7 12:20		
X	30 16:11		
x 3:1,9	301 2:4		
Y	32301 2:5,10,22 16:4		
year 5:12,15	323011866 2:16		
years 6:12	33136 4:12		
Z	33316 1:24 16:15		
0	3rd 1:24 16:15		
01 1:19	4		
1	4 3:3,7		
1 3:7 4:17,21 14:9	4210 1:20 4:11		
100 12:3	5		
11 3:9 7:17	500 2:15		
110614 3:8	5000 2:21		
12 14:9	5252221 16:16		
1218 1:24 16:15	6		
123 2:10 16:4	6 3:8		
141398bid 1:3	7		
141399bid 1:3	7 3:9 9:18 10:3,20		
	77 8:15		