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10 Attorneys for Plaintiff
 11 UNITED STATES OF AMERICA

12 UNITED STATES DISTRICT COURT

13 FOR THE CENTRAL DISTRICT OF CALIFORNIA

14 UNITED STATES OF AMERICA,
 15 Plaintiff,
 16 v.
 17 MARK RIDLEY-THOMAS,
 18 Defendant.

No. CR 21-00485-DSF-1

DECLARATION OF ASSISTANT UNITED STATES ATTORNEY LINDSEY GREER DOTSON AND ATTACHED EXHIBITS FILED IN SUPPORT OF THE GOVERNMENT'S OPPOSITION TO DEFENDANT'S RULE 29 MOTION

21 Plaintiff United States of America, by and through its counsel
 22 of record, the United States Attorney for the Central District of
 23 California and Assistant United States Attorneys Lindsey Greer
 24 Dotson, Thomas F. Rybarczyk, and Michael J. Morse, hereby files the
 25 declaration of Assistant United States Attorney Lindsey Greer Dotson

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DECLARATION OF LINDSEY GREER DOTSON

I, LINDSEY GREER DOTSON, declare as follows:

1. I am an Assistant United States Attorney in the United States Attorney's Office for the Central District of California. I have knowledge of the facts set forth herein and could and would testify to those facts fully and truthfully if called and sworn as a witness.

2. Attached hereto as Exhibit A is true and accurate copy of exhibit 787 -- a demonstrative timeline placing the government's trial exhibits and toll records in chronological order. The demonstrative was not admitted at trial. The government offers the demonstrative as an aid to the Court to assist with its review of the government's admitted trial exhibits, which have been manually filed with the Court. The government notes that the April 23, 2018 voicemail (Ex. 196), while on the demonstrative chart, was not admitted at trial, has not been provided to the Court, and the contents therefore should not be considered in the Court's sufficiency analysis.

3. Attached hereto as Exhibit B are excerpts of the reporter's transcripts from the trial of defendant MARK RIDLEY-THOMAS.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge and that this declaration is executed at Los Angeles, California, on May 22, 2023.


LINDSEY GREER DOTSON

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EXHIBIT A

SUMMARY TIMELINE

| <u>DATE</u> | <u>TIME</u> | <u>TYPE</u> | <u>DESCRIPTION</u> | <u>EXHIBITS</u> |
|--------------------|-------------|-------------|--|-----------------|
| 12-05-2013 | -- | Stipulation | Sebastian Ridley-Thomas becomes a Member of the California State Assembly. | 808 |
| 2016 to Early 2017 | -- | Stipulation | At the time of his resignation on December 31, 2017, Sebastian Ridley-Thomas was the subject of two non-public sexual harassment complaints in the California State Assembly for conduct alleged to have occurred in 2016 and early 2017. | 808 |
| 05-16-2017 | 8:56 p.m. | Email | Email from DEFENDANT to USC School of Social Work Dean Marilyn Flynn ("Dean Flynn"). DEFENDANT states: "Hi! Can you give me a call, please?" | 2 |
| 05-18-2017 | 8:10 a.m. | Email | Email from Sebastian Ridley-Thomas to Dean Flynn: "Might you have a moment for a meeting soon? As early as tomorrow works for me." | 3 |
| 05-18-2017 | 10:21 a.m. | Email | Email from Dean Flynn to Sebastian Ridley-Thomas: "I am glad to hear from you – and so quickly!...Would you please contact my assistant, Alejandro [armaldon@usc.edu]? He will find a time for us that will be mutually convenient." | 4 |
| 05-24-2017 | 9:07 p.m. | Email | Email from Dean Flynn to Leslie Wind. The subject line is "RE: Sebastian Ridley Thomas." Dean Flynn states: "Leslie, please contact him right away. He is the son of Supervisor Mark Ridley Thomas and an elected representative to the State Assembly." Dean Flynn says, "I intend to open every door for him, just as did with Karen." | 5 |
| 05-25-2017 | 6:00 p.m. | Email | Email from Dean Flynn to Leslie Wind. The subject line is "RE: Sebastian Ridley-Thomas." Dean Flynn states: "I'm not sure we can give him a free ride. However, can he sit in classes this summer with permission from the instructor, and we just overlook the audit fee?" | 6 |
| 05-25-2017 | 6:10 p.m. | Email | Email from Dean Flynn to Sebastian Ridley-Thomas and Leslie Wind: "Dean Wind thought her meeting with you was wonderful, and I hope you felt the same. I hope we can work this out!" | 7 |
| 05-26-2017 | 1:00 p.m. | Email | Email from DEFENDANT to Dean Flynn. The subject line is "Assemblymember Sebastian Ridley-Thomas: Next Generation of Leadership Takes Charge - Los | 9 |

| <u>DATE</u> | <u>TIME</u> | <u>TYPE</u> | <u>DESCRIPTION</u> | <u>EXHIBITS</u> |
|-------------------|-------------|-----------------|--|-----------------|
| | | | Angeles Sentinel Los Angeles Sentinel African-American News.” DEFENDANT says: “Thought you might be interested in seeing this article. Looking forward to seeing you soon. We’re overdue for lunch. Lots to catch up on.” | |
| 05-26-2017 | 1:33 p.m. | Email | Email from Dean Flynn to DEFENDANT: “Very nice article on Sebastian!” Dean Flynn says: “The joint degree will suit him perfectly. I would enjoy inviting you to my office for lunch, if you’re available.” | 9 |
| 05-26-2017 | 2:12 p.m. | Email | Email from Dean Flynn to Sebastian Ridley-Thomas: “Hi, Sebastian—I’ve had a chance to talk with Dean Knott at the Price School regarding your interest in a joint degree, online.” Dean Flynn says, “Our two schools will support your tuition.” | 8 |
| 05-26-2017 | 7:51 p.m. | Email | Email from DEFENDANT Dean Flynn: “Please have your assistant call Cindy to schedule a time for us soon.” | 9 |
| 06-05-2017 | 7:41 a.m. | Email | Email from Dean Flynn to Mark Kenneth Todd and other USC employees: “I am going to have dinner with Mark Ridley Thomas on Tuesday night, and I’ll see whether there’s an opportunity to talk with him about these possibilities. There are significant amounts of county funds available, and I think we could make a difference.” | 10 |
| 06-05-2017 | 8:55 a.m. | Email | Email from Mark Kenneth Todd to Dean Flynn and other USC employees: “MRT has lots of discretionary money.” The USC employee says, “He should give us \$1M each year for three years.” | 10 |
| 06-05-2017 | 10:20 a.m. | Email | Email from Dean Flynn to Mark Kenneth Todd: “His son, Sebastian, is planning to enroll for his MSW, I think, and Jack and I are going to try to make it a joint degree. We will offer a full scholarship between the two schools. I did the same for Karen Bass – full scholarship for our funds.” | 10 |
| 06-09-2017 | 10:17 a.m. | Calendar Invite | Calendar invite for Dean Flynn. The subject is “3:00pm – Mark Ridley Thomas.” The date and time are “6/23/2017 3:00:00 PM.” The location is “MRF 214.” | 12 |
| 06-23-2017 | -- | Lobbying Report | Dean Flynn’s Second Quarter 2017 lobbying report. Question 2 asks: “Did you communicate with any Federal, State, County or City staff member (other than an employee whose duties are primarily clerical) or any elected or appointed | 181 |

| <u>DATE</u> | <u>TIME</u> | <u>TYPE</u> | <u>DESCRIPTION</u> | <u>EXHIBITS</u> |
|-------------|-------------|-------------|--|-----------------|
| | | | Federal, State, County or City official and/or state member to influence official action?" The response is "6/23/17" and "Mark Ridley Thomas." | |
| 07-21-2017 | 2:20 p.m. | Email | <p>Email from Dean Flynn: "Dear Marleen and Marv, Supervisor Ridley Thomas and I had a long recent conversation about the needs of the school. He asked me to write a VERY brief summary of what we require for Telehealth support, mental health stipends, and any other pending initiatives with DMH...He is going to try to help."</p> <p>The draft summary states:</p> <p><i>For 4 years, we have been working toward a continuing contract with then-Department of Mental Health for support of Telehealth services. We have also been anxious to obtain stipends for students interested in mental health internships through the Mental Health Services Act. The latter requires a county match. Apparently there were unleveraged, eligible funds in DMH for this purpose which apparently are being used by Public Health (total = \$60 million). We only require \$1 million for the match. Is there any way to pry these funds free and to encourage the DMH director to move forward with stipend support?</i></p> <p><i>With respect to Telehealth, we have been attempting to establish eligibility for funding through Medicaid by DMH. We have had repeated conversations with John Sherin, who is always very cordial and for whom I have substantial respect. However, nothing has happened. We now have deep experience in the use of Telehealth and could make a significant contribution to treatment of several type of mental health services need IF we could get the agency to move on this. Is there any way you can help?</i></p> | 14 |
| 07-23-2017 | 11:12 a.m. | Email | Email from Dean Flynn to Brenda Wiewel: "Brenda, here is the confidential information that needs to be taken to Supervisor Ridley Thomas. Please have Ynah put this on letterhead, place in a sealed envelope and take to MRT's | 15 |

| <u>DATE</u> | <u>TIME</u> | <u>TYPE</u> | <u>DESCRIPTION</u> | <u>EXHIBITS</u> |
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| | | | <p>office. (Or perhaps you can deliver it?).” The email attachment is named “MRT letter.docx.” The beginning states:</p> <p><i>Dear MRT,</i></p> <p><i>I am finally back in the office following a vacation in which I was very disconnected from events and commitments here at USC. Now, however, I am prepared to follow up on our discussion in my office.</i></p> <p><i>I look forward to working with Sebastian and in fact met four officials from Moorhouse last Thursday, who remembered him well. I will try to learn more about his experience in our program so far and take steps with him to plan the road ahead.</i></p> <p><i>Just to recapitulate, you and I discussed five matters when we met:</i></p> <ul style="list-style-type: none"> • <i>Composition of the Home for Good Research Committee – my assessment of its quality, characteristics, strengths, shortcomings</i> • <i>Blocked movement of USC’s Title IVe contract with DCFS</i> • <i>USC role involvement in refurbished neighborhood parole office and current negotiations for possible IVe contraction with Department of Probation</i> • <i>Stalled movement of USC Telehealth contract with Mental Health.</i> | |
| 07-26-2017 | 1:36 p.m. | Email | <p>Email from Dean Flynn to Leslie Wind: “Leslie, thank you for following up with Sebastian...I assured him that we will provide a full scholarship for our program.” Dean Flynn states: “It looks as if the best arrangement for him would be a shared VAC, on-ground experience. We haven’t don’t that with anyone, because basically the shared tuition arrangement applies when the 2U student takes on-ground courses, but with Sebastian we can make an exception.” Dean Flynn says: “I have no idea if you can offer the joint degree,</p> | 17 |

| <u>DATE</u> | <u>TIME</u> | <u>TYPE</u> | <u>DESCRIPTION</u> | <u>EXHIBITS</u> |
|-------------------|-------------|----------------|--|-----------------|
| | | | since there is a specific and very rigid sequence of courses alternating between our school and Price that has to be followed. However, I would be very grateful if you could tackle this enigma.” | |
| 07-27-2017 | 12:16 p.m. | Email | Email from Brenda Wiewel to Dean Flynn: “I’m trying out for courier extraordinaire! MRT has letter waiting at his office in hall of administration.” | 18 |
| 07-31-2017 | 4:57 p.m. | Email | Email from Dean Flynn to USC employees. The subject line is “RE: Supervisor Ridley-Thomas/Kuehl motion to create community reentry hubs for probation – Dworak-Peck School of Social Work mentioned.” Dean Flynn states: “I met with the supervisor recently, and we discussed the school’s interest in involvement. This is exactly what I had hoped would happen.” | 21 |
| 08-01-2017 | -- | Vote | Item No. 16 on the Board of Supervisors’ August 1, 2017 agenda is a motion offered by DEFENDANT and Supervisor Sheila Kuehl. Item No. 16 directs the Chief Probation Officer to report to the Board of Supervisors on the following, among other things: “Recommendations on a Memorandum of Understanding to establish a partnership with the University of Southern California’s School of Social Work to enhance services, particularly around health, homelessness and case management.” DEFENDANT votes “aye” (yes) on Item No. 16. Item No. 16 passes. | 570 571A |
| 08-01-2017 | 9:58 a.m. | Email | Email from Emily Williams, DEFENDANT’s Senior Deputy, to Dean Flynn: “Hello Dean Flynn: We’re looking forward to meeting with you, along with the Probation Department, on Thursday afternoon.” | 22 |
| 08-02-2017 | 8:20 a.m. | Email | Email from David Galaviz to Dean Flynn. The subject line is “Re: Supervisor Ridley-Thomas/Kuehl motion to create community reentry hubs for probation – Dworak-Peck School of Social Work mentioned.” Galaviz states: “Dean Flynn – Thank you. This is really good news!!” | 23 |
| 08-03-2017 | 3:30 p.m. | Calendar Entry | Calendar entry from Dean Flynn’s cell phone: “3:30pm – Chief Terri McDonald (LA County Probation).” The date listed is “8/3/2017.” | 24 810 |
| 09-18-2017 | 12:46 p.m. | Email | Email from Darryl Lucien to Sebastian Ridley-Thomas. The email chain contains communications between Lucien and California State Assembly Human | 360 |

| <u>DATE</u> | <u>TIME</u> | <u>TYPE</u> | <u>DESCRIPTION</u> | <u>EXHIBITS</u> |
|-------------|-------------|-------------|--|---------------------|
| | | | Resources Director Tosha Cherry wherein Cherry says, "I would like to suggest a discussion with Asm. Ridley-Thomas as a next step." | |
| 10-12-2017 | 3:35 p.m. | Email | Email from Jacquelyn McCroskey to Dean Flynn. The subject line is "Probation University." Attached is a document titled "Probation University motion.pdf." McCroskey says, "Assuming you knew about this motion which is coming up for discussion on Tuesday." | 27 |
| 10-12-2017 | 7:15 p.m. | Email | Email from Dean Flynn to Jacquelyn McCroskey. In response to McCroskey's 3:35 p.m. email regarding "Probation University," Dean Flynn states: "I am holding my breath...MRT is really trying to deliver here, Jacquelyn." | 28 |
| 10-17-2017 | -- | Vote | <p>Item No. 3 on the Board of Supervisors' October 17, 2017 agenda is a motion offered by DEFENDANT and Supervisor Janice Hahn.</p> <p>Item No. 3 directs LA County public officials, including the Chief Probation Officer, to submit a written report to the Board of Supervisors on, among other things, the "availability and identification of funding streams to pay for training both within the Department and at 'Probation University.'"</p> <p>At the Board of Supervisors proceedings on October 17, 2017, DEFENDANT states: "But as we think about moving the Department in its totality forward, the Probation University concept is one that helps us send the right message."</p> <p>DEFENDANT votes "aye" (yes) on Item No. 3. Item No. 3 passes.</p> | 573 574A 575A |
| 10-17-2017 | 2:18 p.m. | Email | Email from Jacquelyn McCroskey to Dean Flynn. The subject line is "Good news!" McCroskey states: "I'm happy to say that the item requiring the Prob Chief, CEO, County Counsel DCFS and DHR directors and others to look at feasibility of a Probation University and funding streams to support such an effort passed." | 29 |
| 10-17-2017 | 3:09 p.m. | Email | Email from Dean Flynn to McCroskey. In response to McCroskey's 2:18 p.m. email, Dean Flynn says, "I am THRILLED!" | 29 |

| <u>DATE</u> | <u>TIME</u> | <u>TYPE</u> | <u>DESCRIPTION</u> | <u>EXHIBITS</u> |
|-------------|-------------|-----------------|---|-----------------|
| 10-18-2017 | 11:06 a.m. | Phone Call | Outgoing call from DEFENDANT (xxx-xxx-1405) to Dean Flynn (xxx-xxx-3873) lasting 30 seconds. | 781 804 |
| 11-03-2017 | -- | Lobbying Report | Dean Flynn's Fourth Quarter 2017 lobbying report. The report lists a "Meet re training grant" on "11/03/17" with "Supervisor Mark Ridley-Thomas" and others. Question 2 asks: "Did you communicate with any Federal, State, County or City staff member (other than an employee whose duties are primarily clerical) or any elected or appointed Federal, State, County or City official and/or state member to influence official action?" The response is "11/03/17" and "Mark Ridley Thomas." | 183 |
| 11-18-2017 | 12:20 p.m. | Email | Email from DEFENDANT to Dean Flynn and others. In response to an email regarding a "Concerning question re: IV-e legislation in Congress," DEFENDANT says, "Will check ASAP." | 202 |
| 11-20-2017 | 6:27 a.m. | Phone Call | Outgoing call from Sebastian Ridley-Thomas (xxx-xxx-0342) to DEFENDANT (xxx-xxx-1405) lasting 35 minutes and 13 seconds. | 781 804 |
| 11-20-2017 | 8:14 a.m. | Phone Call | Outgoing call from Sebastian Ridley-Thomas (xxx-xxx-0342) to DEFENDANT (xxx-xxx-1405) lasting 4 seconds. | 781 804 |
| 11-20-2017 | 8:15 a.m. | Phone Call | Outgoing call from DEFENDANT (xxx-xxx-1405) to Sebastian Ridley-Thomas (xxx-xxx-0342) lasting one minute and 49 seconds. | 781 804 |
| 11-20-2017 | 9:20 a.m. | Phone Call | Outgoing call from Sebastian Ridley-Thomas (xxx-xxx-0342) to DEFENDANT (xxx-xxx-1405) lasting zero seconds. | 781 804 |
| 11-20-2017 | 9:21 a.m. | Phone Call | Outgoing call from DEFENDANT (xxx-xxx-1405) to Sebastian Ridley-Thomas (xxx-xxx-0342) lasting 43 seconds. | 781 804 |
| 11-20-2017 | 9:22 a.m. | Phone Call | Outgoing call from DEFENDANT (xxx-xxx-1405) to Sebastian Ridley-Thomas (xxx-xxx-0342) lasting 23 seconds. | 781 804 |
| 11-20-2017 | 9:43 a.m. | Phone Call | Outgoing call from DEFENDANT (xxx-xxx-1405) to Sebastian Ridley-Thomas (xxx-xxx-0342) lasting 32 seconds. | 781 804 |

| <u>DATE</u> | <u>TIME</u> | <u>TYPE</u> | <u>DESCRIPTION</u> | <u>EXHIBITS</u> |
|-------------|-------------|------------------|--|-----------------|
| 11-20-2017 | 10:32 a.m. | Email | Email from DEFENDANT to Sebastian Ridley-Thomas with a Los Angeles Times article stating that California Assemblyman Raul Bocanegra "says he will resign next year as new sexual harassment allegations surface." | 203 |
| 11-20-2017 | 10:10 p.m. | Phone Call | Outgoing call from Sebastian Ridley-Thomas (xxx-xxx-0342) to DEFENDANT (xxx-xxx-1405) lasting 11 seconds. | 781 804 |
| 11-21-2017 | 7:38 a.m. | Phone Call | Outgoing call from Sebastian Ridley-Thomas (xxx-xxx-0342) to DEFENDANT (xxx-xxx-1405) lasting 14 minutes and 57 seconds. | 781 804 |
| 11-28-2017 | 9:38 a.m. | Phone Call | Outgoing call from Sebastian Ridley-Thomas (xxx-xxx-0342) to DEFENDANT (xxx-xxx-1405) lasting 4 seconds. | 781 804 |
| 11-28-2017 | 10:18 a.m. | Phone Call | Outgoing call from DEFENDANT (xxx-xxx-1405) to Sebastian Ridley-Thomas (xxx-xxx-0342) lasting 4 minutes and 44 seconds. | 781 804 |
| 11-28-2017 | 10:26 a.m. | Phone Call | Outgoing call from DEFENDANT (xxx-xxx-1405) to Sebastian Ridley-Thomas (xxx-xxx-0342) lasting 57 seconds. | 781 804 |
| 11-28-2017 | 10:26 a.m. | Phone Call | Outgoing call from Sebastian Ridley-Thomas (xxx-xxx-0342) to DEFENDANT (xxx-xxx-1405) lasting 4 minutes and 8 seconds. | 781 804 |
| 11-28-2017 | 11:17 a.m. | Email and Letter | <p>Email from Tosha Cherry, California State Assembly Human Resources Director, to Sebastian Ridley-Thomas with a letter attached.</p> <p>Cherry's email states: "Hello Mr. Ridley-Thomas, Please see the attached letter concerning our discussion earlier today. As I shared, Ms. Vida Thomas, attorney with Weintraub Tobin Law Corporation will want to schedule an appointment with you in the near future."</p> <p>Cherry's letter states: "Dear Assemblymember Ridley-Thomas: The California State Assembly, Rules Committee, has recently become aware of a complaint concerning your alleged conduct that may constitute a violation of Assembly policy. As a result, an investigation will be conducted. No conclusions will be made until all facts have been gathered and analyzed. An independent attorney investigator, Vida Thomas of Weintraub Tobin Law Corporation will schedule a mutually agreeable date and time for you to meet with her. At the</p> | 633 |

| <u>DATE</u> | <u>TIME</u> | <u>TYPE</u> | <u>DESCRIPTION</u> | <u>EXHIBITS</u> |
|-------------------|-------------|-------------|---|-----------------|
| | | | conclusion of the investigation, the Assembly Rules Committee will determine next steps.” | |
| 11-28-2017 | 5:03 p.m. | Phone Call | Outgoing call from DEFENDANT (xxx-xxx-1405) to Sebastian Ridley-Thomas (xxx-xxx-0342) lasting 19 seconds. | 781 804 |
| 11-28-2017 | 7:54 p.m. | Phone Call | Outgoing call from Sebastian Ridley-Thomas (xxx-xxx-0342) to DEFENDANT (xxx-xxx-1405) lasting 21 seconds. | 781 804 |
| 11-29-2017 | 11:17 a.m. | Phone Call | Outgoing call from DEFENDANT (xxx-xxx-1405) to John Sherin (xxx-xx6-8391) lasting 30 seconds. | 781 804 |
| 11-29-2017 | 11:20 a.m. | Phone Call | Outgoing call from DEFENDANT (xxx-xxx-1405) to John Sherin (xxx-xx6-8391) lasting 5 seconds. | 781 804 |
| 12-01-2017 | 4:58 p.m. | Phone Call | Outgoing call from DEFENDANT (xxx-xxx-1405) to Paul Vandeventer (xxx-xxx-2016) lasting 50 seconds. | 781 804 |
| 12-01-2017 | 5:34 p.m. | Email | Email from Sebastian Ridley-Thomas to DEFENDANT regarding a “sexual harassment pledge” for “male legislators” to sign “to help change the culture of harassment and be vocal about supporting, not punishing, women who share their stories.” | 204 |
| 12-01-2017 | 6:54 p.m. | Phone Call | Outgoing call from Paul Vandeventer (xxx-xxx-2016) to DEFENDANT (xxx-xxx-1405) lasting 36 seconds. | 781 804 |
| 12-01-2017 | 7:04 p.m. | Phone Call | Outgoing call from DEFENDANT (xxx-xxx-1405) to Paul Vandeventer (xxx-xxx-2016) lasting 28 minutes and 52 seconds. | 781 804 |
| 12-02-2017 | 9:23 p.m. | Email | Email from DEFENDANT to Vincent Harris: “Need you to call me ASAP, please. Rather urgent.” | 205 |
| 12-03-2017 | 8:11 p.m. | Email | Email from Vincent Harris to Sebastian Ridley-Thomas. Harris states: “Regarding the letter, the absence of a reason for your resignation will invite conjecture and you need to be prepared to address all the speculation a “surprise’ resignation will engender.” | 206 |
| 12-04-2017 | 8:28 a.m. | Email | Email from Sebastian Ridley-Thomas to DEFENDANT forwarding the 8:11 p.m. email from Vincent Harris in which Harris stated: “Regarding the letter, the absence of a reason for your resignation will invite conjecture and you need to | 206 |

| <u>DATE</u> | <u>TIME</u> | <u>TYPE</u> | <u>DESCRIPTION</u> | <u>EXHIBITS</u> |
|-------------|-------------|-------------|---|---|
| | | | be prepared to address all the speculation a “surprise’ resignation will engender.” | |
| 12-04-2017 | 11:55 a.m. | Email | Email from Paul Vandeventer to DEFENDANT. Vandeventer states: “The financials for AACEP.” The attached document is titled “Balance Sheet and Available Cash Balance 0765 African American Civic Engagement Project.” | 207 |
| 12-04-2017 | 12:09 p.m. | Email | Email from DEFENDANT to Sebastian Ridley-Thomas forwarding the 11:55 a.m. email from Paul Vandeventer with the “financials for AACEP.” | 208 |
| 12-04-2017 | 12:15 p.m. | Phone Call | Outgoing call from Sebastian Ridley-Thomas (xxx-xxx-0342) to DEFENDANT (xxx-xxx-1405) lasting 5 minutes and 6 seconds. | 781 804 |
| 12-04-2017 | 3:36 p.m. | Email | Email from Sebastian Ridley-Thomas to Nancy Sheehan, Lance Olson, Glenn Bunting, and Ralph Frammolino containing a press release regarding the sexual harassment allegations against California State Assemblyman Matt Dababneh. Sebastian Ridley-Thomas states: “FYI...rumors are another Los Angeles Legislator is next...” | 452 |
| 12-04-2017 | 4:35 p.m. | Email | Email from Sebastian Ridley-Thomas to DEFENDANT containing a press release regarding the sexual harassment allegations against California State Assemblyman Matt Dababneh. Sebastian Ridley-Thomas states: “FYI...rumors are another Los Angeles Legislator is next...” | 209 |
| 12-04-2017 | 4:54 p.m. | Phone Call | Outgoing call from DEFENDANT (xxx-xxx-1405) to Sebastian Ridley-Thomas (xxx-xxx-0342) lasting zero seconds. | 781 804 |
| 12-04-2017 | 4:55 p.m. | Phone Call | Outgoing call from DEFENDANT (xxx-xxx-1405) to Sebastian Ridley-Thomas (xxx-xxx-0342) lasting 22 seconds. | 781 804 |
| 12-04-2017 | 4:57 p.m. | Email | Email from DEFENDANT to Sebastian Ridley-Thomas. In response to Sebastian Ridley-Thomas’s 4:35 p.m. email, DEFENDANT says: “Don’t react. These are scare tactics.” | 209 |
| 12-04-2017 | 5:16 p.m. | Email | Email from DEFENDANT to Paul Vandeventer and BCC to Sebastian Ridley-Thomas. DEFENDANT says, “Please call me.” Attached to the email is the signed approval for a payment to Community Partners for \$100,000 from the Mark Ridley-Thomas Ballot Committee. | 211* 507 *BCC to Sebastian Ridley-Thomas |

| <u>DATE</u> | <u>TIME</u> | <u>TYPE</u> | <u>DESCRIPTION</u> | <u>EXHIBITS</u> |
|-------------|-------------|---|---|---|
| 12-04-2017 | 5:22 p.m. | Email | Email from Paul Vandeventer to DEFENDANT: "Will do." | 508 |
| 12-04-2017 | 5:36 p.m. | Phone Call | Outgoing call from Paul Vandeventer (xxx-xxx-2016) to DEFENDANT (xxx-xxx-1405) lasting 2 minutes and 57 seconds. | 781 804 |
| 12-04-2017 | 8:15 p.m. | Email | Email from Sebastian Ridley-Thomas to Dean Flynn: "I wanted to update you on a few things. When might be a good time to chat?" | 32 |
| 12-05-2017 | 7:52 a.m. | Email | Email from Dean Flynn to Sebastian Ridley-Thomas: "I have meetings at the moment, but will try around 10 am." | 32 |
| 12-05-2017 | 2:45 p.m. | Email <i>Count Six Interstate Wire</i> | Email from Sebastian Ridley-Thomas to USC Price School of Public Policy Jack Knott ("Dean Knott") and BCC to DEFENDANT. Sebastian Ridley-Thomas states: "'Practitioner-In-Residence' is a preferable title...The \$25,000.00 range would work as beginning compensation for the type of work you have outlined. The Public Administration/Social Work dual degree is my focus. Please let me know what you think and how we should proceed. I would like to be ready to launch in January." | 33 212* 807 *BCC to DEFENDANT |
| 12-05-2017 | 8:01 p.m. | Phone Call | Outgoing call from DEFENDANT (xxx-xxx-1405) to John Sherin (xxx-xx6-8391) lasting 1 minute and 26 seconds. | 781 804 |
| 12-06-2017 | 7:08 p.m. | Email | Email from Nancy Sheehan to Vida Thomas. Sheehan says, "I look forward to receiving a copy of the sexual harassment policy that forms the basis for the investigation into the allegations against Assemblymember Ridley-Thomas." Sheehan also says, "I understand from our discussion today that you anticipate conducting his interview during the week of December 18th, or sooner if possible." | 621 |
| 12-07-2017 | -- | Check | \$100,000 check from the Mark Ridley-Thomas Committee for a Better L.A. to "Community Partners fbo of AACEP" dated December 7, 2017. | 514 603 |
| 12-07-2017 | 7:20 a.m. | Email | Email from DEFENDANT to Sebastian Ridley-Thomas. The subject line is "Re: Investigation into complaint against Assemblymember/follow up." DEFENDANT says: "?????" | 213 |
| 12-08-2018 | -- | Letter | Letter from John Kennedy to Nancy Sheehan and CC to Vida Thomas. Kennedy states: "Your email was concerning Ms. Thomas' investigation for the Assembly of sexual harassment complaints pertaining to Assemblymember Ridley- | 453 |

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| | | | Thomas. As requested, please find attached a copy of the Assembly's Policy Against Sexual Harassment." | |
| 12-08-2017 | 8:22 a.m. | Email | Email from Sebastian Ridley-Thomas to DEFENDANT. The subject line is "Jade Stevens." A document titled "Stevens Jade 2018 resume.docx" is attached. | 214 |
| 12-08-2017 | 12:58 p.m. | Phone Call | Outgoing call from DEFENDANT (xxx-xxx-1405) to Paul Vandeventer (xxx-xxx-2016) lasting 3 minutes and 58 seconds. | 781 804 |
| 12-08-2017 | 1:14 p.m. | Phone Call | Outgoing call from Paul Vandeventer (xxx-xxx-2016) to DEFENDANT (xxx-xxx-1405) lasting 1 minute and 17 seconds. | 781 804 |
| 12-08-2017 | 1:18 p.m. | Phone Call | Outgoing call from DEFENDANT (xxx-xxx-1405) to Paul Vandeventer (xxx-xxx-2016) lasting 1 minute and 34 seconds. | 781 804 |
| 12-08-2017 | 4:47 p.m. | Email | Email from DEFENDANT to Sebastian Ridley-Thomas. The subject line is "Assemblyman Matt Dababneh to resign following sexual misconduct allegations – LA Times." | 215 |
| 12-09-2017 | 10:21 a.m. | Email | <p>Email from Dean Knott to Sebastian Ridley-Thomas. In response to Sebastian Ridley-Thomas's December 5, 2017 email, Dean Knott states:</p> <p><i>Sabastian:</i></p> <p><i>I appreciated the opportunity to meet to discuss title and types of activities for a role for you at the USC Price School.</i></p> <p><i>Until the end of our conversation, I had thought that you would be working as a full-time member of the state legislature and that you would be giving guest lectures or meeting with student leaders on a voluntary basis, for which we sometimes pay an honorarium. However, in order to create a part-time position with a salary, I will need to discuss this with my Vice Dean for Faculty and my Associate Dean for Administration and Budget. They will also need to put a proposal together on the specifics of an appointment, and once we come to agreement on that, they will need to write up a contract, which will need to be reviewed by the university administration.</i></p> | 34 |

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| | | | <i>Unfortunately, given that it is the last week of the fall semester, and many of us will be leaving next weekend for the holiday break, it is not feasible to complete these tasks in the next few days in order to have a January start date, but I am looking forward to us achieving this goal after the holidays.</i> | |
| 12-09-2017 | 11:17 a.m. | Email <i>Count Seven Interstate Wire</i> | Email from Sebastian Ridley-Thomas to DEFENDANT forwarding Dean Knott's 10:21 a.m. email about Sebastian Ridley-Thomas's requests not being "feasible." | 216 807 |
| 12-09-2017 | 11:58 a.m. | Email | Email from DEFENDANT to Sebastian Ridley-Thomas. The subject line is "The State of the Union: Report: Ken Cooley and Sebastian Ridley-Thomas are the Next #MeToo to Go." | 217 |
| 12-09-2017 | 3:50 p.m. | Email | Email from Sebastian Ridley-Thomas to DEFENDANT. The subject line is "Jobs." The email lists "USC," "AA CEP," "AAVREP," "Private Consulting," and "Media." | 218 |
| 12-10-2017 | 10:51 a.m. | Phone Call | Outgoing call from DEFENDANT (xxx-xxx-1405) to Dean Flynn (xxx-xxx-3873) lasting 3 minutes and 48 seconds. | 781 804 |
| 12-10-2017 | 10:55 a.m. | Phone Call | Outgoing call from DEFENDANT (xxx-xxx-1405) to Dean Flynn (xxx-xxx-3873) lasting 11 minutes and 30 seconds. | 781 804 |
| 12-11-2017 | 8:32 a.m. | Email | Email from Lynn Tamayo. The subject line is "Marilyn – Call Mark Ridley-Thomas." | 35 |
| 12-11-2017 | 9:42 a.m. | Email | Email from Sebastian Ridley-Thomas to DEFENDANT. The subject line is "Draft Job Description." The email contains a "job description" for the "Assistant Director (Deputy Director of Policy) African American Civil Engagement Project." | 219 |
| 12-11-2017 | 8:55 p.m. | Email | Email from Sebastian Ridley-Thomas to Dean Flynn and BCC to DEFENDANT. Sebastian Ridley-Thomas says: "Thanks for the conversation last week. When | 36 220* |

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| | | | your time allows I'd like to follow up on a couple of items. I'm flexible tomorrow." | *BCC to DEFENDANT |
| 12-12-2017 | 6:35 a.m. | Email | Email from Dean Flynn to Sebastian Ridley-Thomas: "I'll try to catch up with you during the day today." | 36 |
| 12-12-2017 | 11:22 a.m. | Email | Email from DEFENDANT to Bill Wong. The email contains a "DRAFT DRAFT DRAFT Rendon Leave Letter." | 221 |
| 12-12-2017 | 12:38 p.m. | Email | Email from Bill Wong to DEFENDANT. In response to DEFENDANT's 11:22 a.m. email, Wong says, "looks good to me." | 222 |
| 12-12-2017 | 4:54 p.m. | Email | Email from Vincent Harris to DEFENDANT: "Thank you. A more formal letter of gratitude will follow shortly." Attached is a photocopy of a check dated "12/7/2017" in the amount of "\$100,000.00" from the "Mark Ridley-Thomas Committee for a Better L.A." to "Community Partners fbo AACEP." | 223 |
| 12-12-2017 | 8:27 p.m. | Email | Email from DEFENDANT to Dean Flynn with the subject line: "Your Innovative Proposal." DEFENDANT's email states: "I spoke with Bobby Cagle today. Are you available to chat for a moment?" | 37 224 |
| 12-13-2017 | 4:44 a.m. | Email | Email from DEFENDANT to Sebastian Ridley-Thomas with the subject line: "When politicians harass." The email contains a link to the Los Angeles Times. | 225 |
| 12-13-2017 | 6:39 a.m. | Email | Email from Dean Flynn to DEFENDANT in response to DEFENDANT's December 12, 2017 email at 8:27 p.m. regarding "Your Innovative Proposal." Dean Flynn states: "I am very interested to hear what you have to say!" | 37 |
| 12-13-2017 | 12:38 p.m. | Phone Call | Outgoing call from DEFENDANT (xxx-xxx-1405) to Dean Flynn (xxx-xxx-8311) lasting 34 seconds. | 781 804 |
| 12-13-2017 | 1:07 p.m. | Phone Call | Outgoing call from DEFENDANT (xxx-xxx-1405) to Dean Flynn (xxx-xxx-8311) lasting 13 minutes and 35 seconds. | 781 804 |
| 12-13-2017 | 6:07 p.m. | Phone Call | Outgoing call from DEFENDANT (xxx-xxx-1405) to John Sherin (xxx-xx6-8391) lasting 59 seconds. | 781 804 |
| 12-13-2017 | 7:37 p.m. | Email | Email from Sebastian Ridley-Thomas to Nancy Sheehan, Ralph Frammolino, Glenn Bunting, and Lance Olson. The subject line and email state: "Does 11am Work...for our conference call tomorrow?" | 454 |

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| 12-13-2017 | 9:32 p.m. | Email | Email from Sebastian Ridley-Thomas to DEFENDANT with the subject line: "Ralph & Glenn on New Rumors." Attached is a document named "New Proposed Statements 12.13.2017.docx." | 226 |
| 12-14-2017 | 8:13 a.m. | Phone Call | Outgoing call from DEFENDANT (xxx-xxx-1405) to John Sherin (xxx-xx6-8391) lasting 3 minutes and 7 seconds. | 781 804 |
| 12-14-2017 | 8:17 a.m. | Email <i>Count Eight Interstate Wire</i> | Email from DEFENDANT to Dean Flynn with the subject line: "John Sherin, MD, PhD." DEFENDANT says, "He's ready to go. 😊" | 38 227 807 |
| 12-14-2017 | 9:09 a.m. | Email | Email from Dean Flynn to June Wiley, Leslie Wind, and John Clapp and CC to Sebastian Ridley-Thomas and Carmen Frierson. The subject line is "HIGHLY IMPORTANT – VAC enrollment of Sebastian Ridley Thomas." The email states: <i>Hi, June and Leslie –</i> <i>Leslie, Sebastian Ridley Thomas is now ready to move forward with his plans to enroll in the VAC this semester. I think his application is incomplete, although he mentioned this morning that he thinks his transcripts were submitted more than two months ago. June, will you please give highest priority to finding out where Sebastian is in the application process for the VAC? He would be a SCI student. As far as I know, he has not identified references and there are likely to be some other components of the application that require his attention before we can move forward.</i> <i>Leslie, Sebastian is going to be in touch with you today , and perhaps you can continue your role in coordinating Sebastian's progress. I know he appreciates this.</i> | 39 |

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| | | | <p><i>The SDP School of Social Work will be paying all of his tuition costs through a scholarship award; John Clapp said that we should tap our endowed funds. John, will you please see that Sebastian does in fact receive an award for full tuition costs this semester? We will plan to continue scholarship support for all of his course work in our program.</i></p> <p><i>Sebastian will be the first to attempt a joint degree through the VAC, combining social work and the Master's in Public Administration from Price. Leslie, I believe you advised Sebastian to begin with required courses in social work. Price is still building their online degree and won't have courses available for several months for the MPA.</i></p> <p><i>Please let Sebastian know what needs to be done, and let's see if we can wind this up before we all leave for the holidays.</i></p> <p><i>Thanks so much!</i></p> <p><i>Marilyn</i></p> | |
| 12-14-2017 | 9:18 a.m. | Email | Email from Dean Flynn to DEFENDANT in response to DEFENDANT's 8:18 a.m. email regarding John Sherin. Dean Flynn states: "This is very good news. Thank you so much!" | 40 228 |
| 12-14-2017 | 11:48 a.m. | Email | Email from Sebastian Ridley-Thomas to DEFENDANT, Nancy Sheehan, Lance Olson, Glenn Bunting, and Ralph Frammolino with the subject line: "Fwd: Senate Leader de León Announces Unprecedented Action to Tackle Sexual Harassment in Legislature." The press release states: "California Senate President pro Tempore Kevin de León (D-Los Angeles) announced Thursday he is taking unprecedented steps to end a culture of pervasive sexual harassment in the Capitol by hiring two law firms with deep experience in investigating work-place misconduct and partnering with a respected non-profit that provides intervention services to abused women." | 455 |

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|-------------|-------------|-------------|---|-----------------|
| 12-14-2017 | 1:13 p.m. | Email | Email from DEFENDANT to Dean Flynn in response to Dean Flynn's 9:18 a.m. email regarding "John Sherin." DEFENDANT's email has a thumbs up emoji. | 43 |
| 12-14-2017 | 1:50 p.m. | Email | Email from Sebastian Ridley-Thomas to DEFENDANT, Nancy Sheehan, Glenn Bunting, Ralph Frammolino, and Lance Olson. Attached are screenshots of Twitter posts stating: "Ken Cooley and Sebastian Ridley-Thomas are the Next #MeToo [] to Go." | 456 |
| 12-14-2017 | 2:34 p.m. | Email | Email from Dean Flynn to Leslie Wind. The subject line is "RE: HIGHLY IMNPORTANT – VAC enrollment of Sebastian Ridley Thomas." Dean Flynn states: "He told me that he had submitted his transcripts, which apparently he has not in fact done. Maybe he assigned this to one of his aides. I hope he pays attention to this." | 44 |
| 12-14-2017 | 4:12 p.m. | Email | Email from Emily Williams, DEFENDANT's Senior Deputy, to Dean Flynn and CC to Bobby Cagle and Veronica Martinez. The subject line is "DCFS Director Bobby Cagle." Williams states: "Hello Dean Flynn: It is my pleasure to introduce you, via e-mail, to Mr. Bobby Cagle, the new Director of DCFS. Supervisor Ridley-Thomas has asked that I connect the two of you and facilitate a meeting to discuss a partnership among USC, DCFS, DMH, and the Probation Department." | 45 |
| 12-14-2017 | 6:59 p.m. | Email | Email from John Clapp to Dean Flynn. Clapp states: "Sebastian Thomas Scott—we have been in contact with him several times today. He apparently never completed the application or sent his transcripts. Necole is working on that with him and we should have it all sorted out. Scholarship and Dean's Leadership Scholar will be awarded and that will cover his full tuition." | 46 |
| 12-15-2017 | 6:26 a.m. | Email | Email from Dean Flynn to Michele Clark with the subject line "Sebastian letter." Dean Flynn provides "the address to which Sebastian's offer letter should be sent." Dean Flynn says, "Hope we can get this done." | 47 |
| 12-15-2017 | 6:30 a.m. | Email | Email from Dean Flynn to Dean Knott. The subject line is "URGENT: Sebastian Ridley THomas offer letter." Dean Flynn says: <i>Hi, Jack –</i> | 48 |

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| | | | <p><i>I see you escaped before I could catch you regarding the offer letter for Sebastian Ridley Thomas. I think in the interests of showing MRT that we can deliver, it would be provident to get the offer letter out before the holidays. I asked Michele Clark to work with Connie and Regina to see whether we can draft language that you can review. We will plan to JV our share of Sebastian's salary (our share=\$25K) to Price, so his compensation and terms of employment can be administered from your school. If you want to change the language in the draft I wrote, absolutely you should do so. I just tried to get the ball rolling. You should be hearing from people today about this. Merry Christmas!</i></p> <p><i>Marilyn</i></p> | |
| 12-15-2017 | 5:13 p.m. | Phone Call | Outgoing call from John Sherin (xxx-xx6-8391) to Dean Flynn (xxx-xxx-3873) lasting 4 minutes and 29 seconds. | 672 804 |
| 12-16-2017 | 7:36 a.m. | Email | Email from Dean Flynn to Michele Clark and Emily Williams. Dean Flynn says, "I spoke with John Sherin late on Friday afternoon...He sees himself, together with USC, as the 'glue' that will be holding this conversation together since he will be supporting the budget for any ensuring proposals from his budget...." | 60 |
| 12-16-2017 | 7:41 a.m. | Email | Email from Dean Flynn to Michele Clark and CC to Sebastian Ridley-Thomas. Dean Flynn states: "Sebastian, as you can see, we will not complete work on the offer letter until January, simply because there are just too many relevant staff at Price who have left early for vacation. As you can also see, Michele is on top of this, she'll be in touch with you, and we'll wrap this up in January, hopefully by the 15 th ." | 57 |
| 12-16-2017 | 8:01 a.m. | Email | Email from Sebastian Ridley-Thomas to DEFENDANT forwarding Dean Flynn's 7:41 a.m. email regarding the "offer letter." | 229 |
| 12-16-2017 | 8:06 a.m. | Email | Email from DEFENDANT to Sebastian Ridley-Thomas in response to Sebastian Ridley-Thomas's 8:01 a.m. email. DEFENDANT responds with a green checkmark. | 230 |

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| 12-18-2017 | 5:54 a.m. | Email | Email from DEFENDANT to Fesia Davenport: "Where we on our probation project? Haven't heard from you on it in a few weeks. Any progress??" | 231 |
| 12-21-2017 | 8:58 p.m. | Email | Email from DEFENDANT to Sebastian Ridley-Thomas. The subject line is "New Title." The email states: "Sebastian Ridley-Thomas (SRT) is the Chief Strategist of the African American Voter Registration, Educational and Participation Project (AAVREP)." | 232 |
| 12-22-2017 | 8:06 a.m. | Email | Email from DEFENDANT to Sebastian Ridley-Thomas. The subject line is "Fwd: New Title (Update)." The email states that Sebastian Ridley-Thomas is "the Executive Director for the African American Civic Engagement Project (AA CEP)" and "a Practitioner in Residence at the University of Southern California." | 233 |
| 12-24-2017 | 11:59 a.m. | Phone Call | Outgoing call from DEFENDANT (xxx-xxx-1405) to Paul Vandeventer (xxx-xxx-2016) lasting 0 seconds. | 781 804 |
| 12-24-2017 | 12:00 p.m. | Phone Call | Outgoing call from DEFENDANT (xxx-xxx-1405) to Paul Vandeventer (xxx-xxx-2016) lasting 28 seconds. | 781 804 |
| 12-24-2017 | 2:02 p.m. | Phone Call | Outgoing call from Paul Vandeventer (xxx-xxx-2016) to DEFENDANT (xxx-xxx-1405) lasting 16 minutes and 20 seconds. | 781 804 |
| 12-24-2017 | 3:09 p.m. | Phone Call | Outgoing call from DEFENDANT (xxx-xxx-1405) to Dean Flynn (xxx-xxx-3873) lasting 1 minute and 25 seconds. | 781 804 |
| 12-24-2017 | 3:13 p.m. | Email | Email from DEFENDANT to Dean Flynn: "Please call at your earliest convenience as I have confidential news to share with you." | 62 235 |
| 12-25-2017 | 7:52 p.m. | Email | Email from DEFENDANT to DEFENDANT with the subject line "Fwd: Resignation Letter Statement (3rd draft)." | 236 |
| 12-26-2017 | 9:02 a.m. | Phone Call | Outgoing call from Dean Flynn (xxx-xxx-2959) to DEFENDANT (xxx-xxx-1405) lasting 56 seconds. | 781 804 |
| 12-26-2017 | 9:06 a.m. | Phone Call | Outgoing call from DEFENDANT (xxx-xxx-1405) to Dean Flynn (xxx-xxx-2959) lasting 4 minutes and 8 seconds. | 781 804 |
| 12-26-2017 | 3:06 p.m. | Email | Email from DEFENDANT to Bill Wong and BCC to Sebastian Ridley-Thomas and himself. The subject line is "Fwd: Resignation Letter Statement (3rd draft)." DEFENDANT states: "Bill, As promised. DRAFT ONLY. Thank you. MRT." | 237* *BCC to Sebastian Ridley-Thomas |

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| 12-26-2017 | 3:29 p.m. | Email | Email from Bill Wong to DEFENDANT in response to DEFENDANT's 3:06 p.m. email. Wong states: "Looks good to me...i like the nuanced language in the red parentheses..they are suggestive without being defensive..." | 238 |
| 12-26-2017 | 6:27 p.m. | Email | Email from DEFENDANT to Glenn Bunting and Ralph Frammolino and CC to Darryl Lucien regarding a "6:45PM Press Call." | 239 |
| 12-26-2017 | 6:33 p.m. | Email | Email from DEFENDANT to Darryl Lucien and CC to Glenn Bunting and Ralph Frammolino. The subject line is "Revised Release." | 240 |
| 12-26-2017 | 8:18 p.m. | Email | Email from Darryl Lucien to DEFENDANT. Lucien forwards an email which states: "Given the sensitivity of the matter at hand, it is very important that we forward all press inquiries we may receive to Ms. Stevens, CC'ing me." | 241 |
| 12-26-2017 | 8:22 p.m. | Email | Email from DEFENDANT to Jade Stevens forwarding the "Draft Job Description" for the "Assistant Director (Deputy Director of Policy) African American Civic Engagement Project." | 242 |
| 12-26-2017 | 8:26 p.m. | Email | Email from DEFENDANT to Jade Stevens and BCC to Sebastian Ridley-Thomas. The subject line is "African American Civic Engagement Project." DEFENDANT states: "All of this would be updated in light of our conversation. Thank you. http://www.supportaacep.org/ ." | 243* *BCC to Sebastian Ridley-Thomas |
| 12-27-2017 | 8:06 a.m. | Email | Email from Glenn Bunting to DEFENDANT and CC to Ralph Frammolino, Darryl Lucien, and Jade Stevens. Bunting states, "let's put the statement on SRT office letterhead and circulate to this group along with a copy of the official resignation letter." | 244 |
| 12-27-2017 | 8:30 a.m. | Email | Email from Jade Stevens to DEFENDANT, Glenn Bunting, and Ralph Frammolino. Stevens states: "Please see attached for the revised announcement. Now on our letterhead and including a headline." The attached document is titled "SRT Resignation announcement.docx." | 459 |
| 12-27-2017 | 9:52 a.m. | Email | Email from DEFENDANT to Ralph Frammolino regarding the "SRT Resignation Letter." | 460 |
| 12-27-2017 | 10:04 a.m. | Email | Email from DEFENDANT to Ralph Frammolino with the subject line "Leave Letter." DEFENDANT says, "This was sent on 12/13/17 and the Speaker acknowledged the same day." | 461 |

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| 12-27-2017 | 10:24 a.m. | Email | Email from DEFENDANT to Dorinne Jordan with the subject line "SRT/MRT Statement." | 245 |
| 12-27-2017 | 11:07 a.m. | Email | Email from Jade Stevens to DEFENDANT, Glenn Bunting, and Ralph Frammolino. Attached is a press release titled "SRT Resignation announcement.docx." Stevens says, "Please use this version of the announcement." | 246 |
| 12-27-2017 | 11:28 a.m. | Email | Email from Jade Stevens to DEFENDANT. Attached is a letter from Sebastian Ridley-Thomas to Speaker Rendon titled "SRT Resignation Letter.docx." | 247 |
| 12-27-2017 | 11:45 a.m. | Email | Email from DEFENDANT to Dorinne Jordan regarding a "Statement on Assemblymember Ridley-Thomas." | 248 |
| 12-27-2017 | 1:22 p.m. | Email | Email from DEFENDANT to Nancy Sheehan and Lance Olson. The subject line is "Assemblyman Sebastian Ridley-Thomas is resigning – LA Times." | 249 |
| 12-27-2017 | 1:58 p.m. | Email | Email from Nancy Sheehan to Vida Thomas and CC to John Kennedy. Sheehan says: <i>Dear Ms. Thomas,</i> <i>When we spoke on December 14th, I told you that Assemblymember Ridley-Thomas was undergoing surgery related to the medical condition that caused him to take a leave of absence earlier this year and thus would be unavailable for matters relating to the investigation you are conducting until he has fully recuperated. The surgery took place on December 18th. I wanted to let you know that yesterday Assemblymember Ridley-Thomas submitted a letter of resignation to Speaker Rendon, effective December 31, 2017. The five surgeries he endured this year, along with advice from his physicians, convinced Assemblymember Ridley-Thomas that he needs to focus first and foremost on recovering his good health. At this point I do not have any further information on when he will be medically cleared by his team of doctors.</i> | 367* *BCC to DEFENDANT (obtained from DEFENDANT's AOL email account) |

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| 12-27-2017 | 2:31 p.m. | Email | Email from Darryl Lucien to DEFENDANT and CC to Glenn Bunting and Ralph Frammolino. The subject line is "3:15 pm Press Call." Lucien says, "The Supervisor would like to schedule a call for 3:15 pm." | 250 |
| 12-28-2017 | 8:32 a.m. | Email | Email from Glenn Bunting to DEFENDANT. In response to an email from DEFENDANT with a link to an LA Times articles, Bunting says: "Today's key. Let's hope for smooth sailing." | 251 |
| 12-28-2017 | 8:44 a.m. | Email | Email from DEFENDANT to Glenn Bunting. In response to Bunting's 8:32 a.m. email, DEFENDANT says, "Agreed." | 251 |
| 12-28-2017 | 10:53 a.m. | Email | Email from DEFENDANT to Dorinne Jordan and BCC to Sebastian Ridley-Thomas. The subject line is "Re: Bio." DEFENDANT sends Jordan a biography for Sebastian Ridley-Thomas. | 252* *BCC to Sebastian Ridley-Thomas |
| 12-28-2017 | 11:30 a.m. | Email | Email from Sebastian Ridley-Thomas to DEFENDANT in response to DEFENDANT's 10:53 a.m. email: "Thumbs up." | 254 |
| 12-28-2017 | 6:43 p.m. | Email | Email from DEFENDANT to Sebastian Ridley-Thomas with the subject line: "ACEP Administrative Coordinator Job Description_2017-12-28.docx." DEFENDANT says, "Feedback please." | 255 |
| 12-28-2017 | 7:37 p.m. | Phone Call | Outgoing call from DEFENDANT (xxx-xxx-1405) to Paul Vandeventer (xxx-xxx-2016) lasting 10 minutes and 32 seconds. | 781 804 |
| 12-28-2017 | 7:45 p.m. | Email | Email from Sebastian Ridley-Thomas to DEFENDANT with the subject line "Pre-Resignation Resume." Sebastian Ridley-Thomas says, "Your edits are most welcome. Thank you for your continued assistance." | 256 |
| 12-30-2017 | 7:41 p.m. | Email | Email from DEFENDANT to Bill Wong. DEFENDANT states: "HMMMMMMMMM.....This was published in a widely read electronic blog around the Capitol..." The blog article states: "Sebastian Ridley-Thomas's resignation was not really unexpected...Everyone is innocent until proven guilty, but eyebrows must be raised considering all the factors." | 257 |
| 12-31-2017 | 4:13 a.m. | Email | Email from Bill Wong to DEFENDANT. Wong states: "responding or reacting to the post would draw more attention than the post would have garnered itself during the break while most lobbyists and members are away for the | 258 |

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| | | | holidays.” Wong continues, “i think people will move on as long as the reality of sebastian’s health problem is a plausible alternate narrative and our reaction to rumors/gossip do not come across as overly defensive.” | |
| 12-31-2017 | 7:29 a.m. | Email | Email from DEFENDANT to Bill Wong: “Very helpful, per usual. Thanks very much! Talk soon.” | 259 |
| 12-31-2017 | -- | Stipulation | At the time of his resignation on December 31, 2017, Sebastian Ridley-Thomas was the subject of two non-public sexual harassment complaints in the California State Assembly for conduct alleged to have occurred in 2016 and early 2017. | 808 |
| 01-02-2018 | 10:51 a.m. | Email | Email from Vienna Von Renner to DEFENDANT, Jade Stevens, Glenn Bunting, Ralph Frammolino, and Darryl Lucien. The subject line is “Sebastian Ridley-Thomas media monitoring report 1.2.18.” Page 6 states, “Another state lawmaker has resigned: Assemblyman Sebastian Ridley-Thomas stepped down, blaming health issues for his departure before the end of the two-year session in August.” Page 9 states, “The scandal-caused resignations of Assemblymen Raul Bocanegra and Matt Dababneh, plus the health-related departure of Sebastian Ridley-Thomas, mean the Assembly’s Democrats will return to Sacramento without a two-thirds super majority.” Page 11 states, “A third Assemblymember, Sebastian Ridley-Thomas (D-Los Angeles), just this week announced his <u>sudden resignation, citing health reasons</u> —after his name had been whispered as someone else who might end up in the spotlight on this issue.” | 466 |
| 01-02-2018 | 11:35 a.m. | Email | Email from Bill Wong to DEFENDANT with the subject line “todays nooner.” Wong says, “FYI, no mention this time...so far a good sign that folks have moved on.” | 260 |
| 01-02-2018 | 4:27 p.m. | Email | Email from Parke Skelton to DEFENDANT and Steven Barkan. In response to a “query from The Sacramento Bee” regarding “Assemblyman Sebastian Ridley-Thomas’ recent resignation,” Skelton says: “ FYI Did not respond.” | 261 |
| 01-03-2018 | 7:58 p.m. | Email | Email to Sebastian Ridley-Thomas with the subject line “Welcome Packet – Please Read!” The email states: “Hello Sebastian, Welcome to the MSW | 63 |

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|-------------------|-------------|-------------|--|-----------------|
| | | | program at The University of Southern California! We are glad that you are here and a part of The Trojan Family. Attached you will find a <i>Welcome Packet</i> , which will provide helpful information as you embark on your MSW journey in <i>The Virtual Academic Center</i> .” | |
| 01-04-2018 | 7:04 a.m. | Email | Email from Vienna Von Renner to DEFENDANT, Jade Stevens, Glenn Bunting, Ralph Frammolino, and Darryl Lucien. The subject line is “Sebastian Ridley-Thomas media monitoring report 1.4.18.” Page 7 states, “Dababneh’s and Bocanegra’s resignations, along with Sebastian Ridley-Thomas’ resignation last week for health reasons, has at least temporarily dropped Democrats below a two-thirds supermajority in the Assembly.” Page 8 states, “Over the course of the last month, three Democratic members of the state assembly have stepped down; Raul Bocanegra, D-Pacoima, and Matt Dababneh, D-Encino, as a result of sexual harassment allegations and Sebastian Ridley-Thomas, D-Los Angeles, for ‘health reasons.’” | 467 |
| 01-04-2018 | 10:39 a.m. | Email | Email from Glenn Bunting to DEFENDANT and CC to Ralph Frammolino. The email contains a “Draft Reactive Statement” to the blog post that Sebastian Ridley-Thomas’s resignation “has been rumored for awhile” and “eyebrows must be raised.” | 262 |
| 01-04-2018 | 1:42 p.m. | Email | Email from DEFENDANT to Ralph Frammolino, Nancy Sheehan, Lance Olson, and Glenn Bunting. The attached screenshot states: “Assemblymember Sebastian Ridley-Thomas resigned for ‘medical reasons.’ I have three legit sources with specific sexual misbehavior instances that have been filed as harassment complaints, which are sealed under the Assembly Rules Committee.” | 263 |
| 01-04-2018 | 1:50 p.m. | Email | Email from DEFENDANT to Bill Wong. DEFENDANT says, “Shall we chat?” The attached screenshot states: “Assemblymember Sebastian Ridley-Thomas resigned for ‘medical reasons.’ I have three legit sources with specific sexual misbehavior instances that have been filed as harassment complaints, which are sealed under the Assembly Rules Committee.” | 264 |

| <u>DATE</u> | <u>TIME</u> | <u>TYPE</u> | <u>DESCRIPTION</u> | <u>EXHIBITS</u> |
|-------------|-------------|-------------|---|-----------------|
| 01-04-2018 | 4:25 p.m. | Email | Email from Sebastian Ridley-Thomas to DEFENDANT forwarding his Spring 2018 USC course schedule. Classes for Spring 2018 classes begin "Monday, January 8." | 265 |
| 01-04-2018 | 6:01 p.m. | Email | Email from Sebastian Ridley-Thomas to DEFENDANT with the subject line "\$\$\$." Sebastian Ridley-Thomas says, "Overall debt: 32.2k (15k in high interest)." | 266 |
| 01-05-2018 | 11:37 a.m. | Email | Email to Sebastian Ridley-Thomas from the USC Office of Admissions. The email states: "Your enrollment deposit for the MSW@USC program has been waived." | 64 |
| 01-05-2018 | 12:57 p.m. | Phone Call | Outgoing call from DEFENDANT (xxx-xxx-1405) to Paul Vandeventer (xxx-xxx-2016) lasting 28 seconds. | 781 804 |
| 01-05-2018 | 1:05 p.m. | Phone Call | Outgoing call from DEFENDANT (xxx-xxx-1405) to Dean Flynn (xxx-xxx-3873) lasting 19 seconds. | 781 804 |
| 01-05-2018 | 1:07 p.m. | Email | Email from DEFENDANT to Dean Flynn: "Please give me a call when you can." | 65 268 |
| 01-06-2018 | 10:15 a.m. | Email | Email from Dean Flynn to DEFENDANT: "Will call on Monday." | 66 269 |
| 01-06-2018 | 10:41 a.m. | Email | Email from Dean Flynn to Monica Ellis. Dean Flynn states: "Yes – Price is covering the cost of courses taken for his MPA degree, and we are covering for the MSW. He should be registered for the joint degree. However, since I understand that he plans to take this online, he will have to go 'out of order' so to speak on some of his MPA courses, or at least I think so, because Price hasn't finished their online MPA development yet." | 67 |
| 01-06-2018 | 1:19 p.m. | Email | Email from Dean Flynn to Monica Ellis. In the email chain, Ellis tells Dean Flynn: "I will be sure to notate his dual degree program objective. Please note, our dual degree post code is only valid for campus-based students. However, I will explore ways to work around this matter and his unique course sequencing." Dean Flynn responds: "I think the extra effort will be worth it (for obvious reasons.)" | 67 |

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|-------------|-------------|--|--|------------------|
| 01-06-2018 | 1:29 p.m. | Email | Email from Sebastian Ridley-Thomas to DEFENDANT. The subject line is "Draft Updated Resume." | 270 |
| 01-06-2018 | 10:15 p.m. | Email | Email from Sebastian Ridley-Thomas to DEFENDANT. The subject line is "Re: \$\$\$." | 271 |
| 01-07-2018 | 6:15 p.m. | Email | Email from DEFENDANT to Sebastian Ridley-Thomas. Attached is a document titled "SRT2017Res.docx." | 272 |
| 01-07-2018 | 6:36 p.m. | Email | Email from Sebastian Ridley-Thomas to DEFENDANT. The subject line is "Its real...real..." The attached document is titled "January.docx." | 68 273 |
| 01-08-2018 | 1:20 p.m. | Phone Call | Outgoing call from DEFENDANT (xxx-xxx-1405) to Dean Flynn (xxx-xxx-8311) lasting 22 seconds. | 781 804 |
| 01-08-2018 | 1:22 p.m. | Phone Call | Outgoing call from DEFENDANT (xxx-xxx-1405) to Dean Flynn (xxx-xxx-3873) lasting 10 minutes and 42 seconds. | 781 804 |
| 01-08-2018 | 1:33 p.m. | Phone Call | Outgoing call from DEFENDANT (xxx-xxx-1405) to Dean Flynn (xxx-xxx-3873) lasting 1 minute and 6 seconds. | 781 804 |
| 01-08-2018 | 5:14 p.m. | Phone Call | Outgoing call from DEFENDANT (xxx-xxx-1405) to Paul Vandeventer (xxx-xxx-2016) lasting 4 minutes and 2 seconds. | 781 804 |
| 01-08-2018 | 5:18 p.m. | Phone Call | Outgoing call from DEFENDANT (xxx-xxx-1405) to Paul Vandeventer (xxx-xxx-2016) lasting 6 minutes and 29 seconds. | 781 804 |
| 01-08-2018 | 6:13 p.m. | Phone Call | Outgoing call from DEFENDANT (xxx-xxx-1405) to Dean Flynn (xxx-xxx-3873) lasting 13 minutes and 3 seconds. | 781 804 |
| 01-09-2018 | 1:31 p.m. | Email <i>Count Nine Interstate Wire</i> | Email from Sebastian Ridley-Thomas to DEFENDANT. The forwarded email states: "Dear Sebastian Ridley-Thomas, Congratulations! We are pleased to inform you that you have been selected as a recipient of the USC Suzanne Dworak-Peck School of Social Work MSW VAC Scholarship. You are receiving a full tuition scholarship, which will be applied to your tuition and fees for the duration of your program." | 70 274 807 |
| 01-09-2018 | 3:50 p.m. | Email | Email from DEFENDANT to Sebastian Ridley-Thomas in response to Sebastian Ridley-Thomas's 1:31 p.m. email. DEFENDANT's email contains three clapping hand emojis. | 71 275 |

| <u>DATE</u> | <u>TIME</u> | <u>TYPE</u> | <u>DESCRIPTION</u> | <u>EXHIBITS</u> |
|-------------|-------------|-------------|--|---|
| 01-10-2018 | 9:56 p.m. | Email | Email from Sebastian Ridley-Thomas to DEFENDANT. The subject line is "Debt Consolidation." The email states: "MR-T, For the purpose of high interest debt consolidation, I propose a \$15,800.00 personal loan with payment beginning in June 2018 at 4.5% for 12 months (\$1375.00 per month). Thank you for your consideration." | 276 |
| 01-16-2018 | 12:12 p.m. | Email | Email from DEFENDANT to Jade Stevens and BCC to Sebastian Ridley-Thomas. The subject line is "ACEP Associate Director." | 277* *BCC to Sebastian Ridley-Thomas |
| 01-17-2018 | 3:49 p.m. | Email | Email from Sebastian Ridley-Thomas to DEFENDANT. The subject line is "DRAFT Deans Flynn and Knott." The body of the email states: <i>Deans Flynn and Knott,</i> <i>A Happy 2018 to you! I trust this email finds both of you well.</i> <i>As you both know, since last we communicated I have resigned the State Assembly to improve my ailing health. The path to wellness has been a task and is progressing appropriately.</i> <i>I would like to be prepared to serve the Social Work and Policy Schools as I return to work. I expect to be cleared by my physician team as early as mid-February. I have a concept of what you both desire of me as an employee and look forward to refining the responsibilities!</i> <i>Yours in service,</i> <i>Sebastian Ridley-Thomas</i> | 278 |
| 01-17-2018 | 7:57 p.m. | Email | Email from Sebastian Ridley-Thomas to Dean Flynn and Dean Knott. The subject line is "2018 and The Future." The body of the email states: | 72 |

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|-------------------|-------------|-------------|---|-----------------|
| | | | <p><i>Deans Flynn and Knott,</i></p> <p><i>A Happy 2018 to you! I trust this email finds both of you well.</i></p> <p><i>As is known, since last we communicated I have resigned my post in the State Assembly to improve my health. The path to wellness has been challenging but things are progressing appropriately.</i></p> <p><i>I would like to be prepared to assist the Social Work and Policy Schools as I return to work. I could be cleared by my physician team as early as mid-February. I have a concept of what you both desire of me and look forward to refining expectations and responsibilities.</i></p> <p><i>Is there a written offer or agreement that I might review as we think this through together?</i></p> <p><i>Sincerely,</i></p> <p><i>Sebastian Ridley-Thomas</i></p> | |
| 01-17-2018 | 9:08 p.m. | Email | Email from Dean Flynn to Michele Clark. The subject line is "FW: 2018 and The Future." Dean Flynn states: "Would you jump all over this? We need to get this finished." | 73 |
| 01-18-2018 | 10:02 a.m. | Email | Email from Dean Knott to Sebastian Ridley-Thomas and Dean Flynn and CC to Mike Nichol. Dean Knott states: "We are in the process of preparing a written offer, which we will get to you shortly." | 74 |
| 01-18-2018 | 12:02 p.m. | Email | Email from Sebastian Ridley-Thomas to DEFENDANT forwarding Dean Knott's 10:02 a.m. email. | 279 |
| 01-18-2018 | 1:17 p.m. | Email | Email from Sebastian Ridley-Thomas to DEFENDANT. Sebastian Ridley-Thomas states: "If allowed, I need 3,200.00 more for this month's expenses (excluding | 280 |

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|-------------|-------------|-------------|--|-----------------|
| | | | yet known final healthcare and tax costs). My goal is to be as frugal as possible. I would add that February and March, depending on healthcare costs, will run between 10k-11k. April will likely be 60% more in expenses (Roughly 16k for expenses, including healthcare, vision, dental, taxes and Roth contribution). Thank you for your consideration." | |
| 01-18-2018 | 1:37 p.m. | Email | Email from DEFENDANT to Sebastian Ridley-Thomas in response to Sebastian Ridley-Thomas's 1:17 p.m. email: "Mercy!" | 280 |
| 01-20-2018 | 11:08 a.m. | Phone Call | Outgoing call from DEFENDANT (xxx-xxx-1405) to John Sherin (xxx-xx6-8391) lasting 36 seconds. | 781 804 |
| 01-20-2018 | 11:16 a.m. | Phone Call | Outgoing call from John Sherin (xxx-xx6-8391) to DEFENDANT (xxx-xxx-1405) lasting 30 seconds. | 781 804 |
| 01-20-2018 | 11:35 p.m. | Phone Call | Outgoing call from DEFENDANT (xxx-xxx-1405) to John Sherin (xxx-xx6-8391) lasting 10 minutes and 47 seconds. | 781 804 |
| 01-20-2018 | 4:01 p.m. | Email | Email from Sebastian Ridley-Thomas to DEFENDANT. The subject line is "January Tasks." Attached is a document titled "January Task Sheet." | 281 |
| 01-20-2018 | 4:34 p.m. | Email | Email from DEFENDANT to Sebastian Ridley-Thomas with a green checkmark. | 282 |
| 01-21-2018 | 6:01 a.m. | Email | Email from DEFENDANT to Sebastian Ridley-Thomas. The subject line is "Family note." | 283 |
| 01-21-2018 | 7:07 a.m. | Email | Email from Sebastian Ridley-Thomas to DEFENDANT. The subject line is "Re: Family note." | 284 |
| 01-22-2018 | 10:22 p.m. | Email | Email from Sebastian Ridley-Thomas to Sebastian Ridley-Thomas. The subject line is "A Family Update." | 285 |
| 01-23-2018 | 7:05 p.m. | Phone Call | Outgoing call from Paul Vandeventer (xxx-xxx-2016) to DEFENDANT (xxx-xxx-1405) lasting 11 minutes and 13 seconds. | 781 804 |
| 01-23-2018 | 8:05 p.m. | Phone Call | Outgoing call from DEFENDANT (xxx-xxx-1405) to Paul Vandeventer (xxx-xxx-2016) lasting 54 seconds. | 781 804 |
| 01-23-2018 | 8:55 p.m. | Phone Call | Outgoing call from DEFENDANT (xxx-xxx-1405) to Paul Vandeventer (xxx-xxx-2016) lasting 4 seconds. | 781 804 |
| 01-24-2018 | 9:01 a.m. | Email | Email from Mike Nichol to Sebastian Ridley-Thomas. The subject line is "2018 and The Future." Nichol states: "Hi Sebastian, I'm the Vice Dean for Faculty | 75 |

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|-------------------|-------------|-------------|---|-----------------|
| | | | Affairs at Price, so I'll be managing our offer to you to serve as a part-time professor of practice. Could you please send me an electronic copy of your CV/resume? I'll need to coordinate with the Provost's office since this is a special hiring process, and the resume will be required to obtain their approval." | |
| 01-24-2018 | 9:01 a.m. | Phone Call | Outgoing call from DEFENDANT (xxx-xxx-1405) to Paul Vandeventer (xxx-xxx-2016) lasting 3 seconds. | 781 804 |
| 01-24-2018 | 1:44 p.m. | Email | Email from Sebastian Ridley-Thomas to Sebastian Ridley-Thomas. The subject line is "From A Friend." | 286 |
| 01-24-2018 | 5:19 p.m. | Phone Call | Outgoing call from DEFENDANT (xxx-xxx-1405) to Paul Vandeventer (xxx-xxx-2016) lasting 4 seconds. | 781 804 |
| 01-24-2018 | 11:32 p.m. | Email | Email from Sebastian Ridley-Thomas to DEFENDANT. The subject line is "Hard List." Sebastian Ridley-Thomas states, "200k in Non-profit monies (460k identified)." | 287 |
| 01-24-2018 | 11:56 p.m. | Email | Email from DEFENDANT to Sebastian Ridley-Thomas. The subject line is "Re: Hard List." The email has a smiley face emoji. | 288 |
| 01-25-2018 | 4:48 p.m. | Phone Call | Outgoing call from DEFENDANT (xxx-xxx-1405) to Paul Vandeventer (xxx-xxx-2016) lasting 29 seconds. | 781 804 |
| 01-25-2018 | 4:55 p.m. | Phone Call | Outgoing call from Paul Vandeventer (xxx-xxx-2016) to DEFENDANT (xxx-xxx-1405) lasting 3 minutes and 12 seconds. | 781 804 |
| 01-25-2018 | 4:59 p.m. | Phone Call | Outgoing call from DEFENDANT (xxx-xxx-1405) to Paul Vandeventer (xxx-xxx-2016) lasting 2 seconds. | 781 804 |
| 01-25-2018 | 4:59 p.m. | Phone Call | Outgoing call from Paul Vandeventer (xxx-xxx-2016) to DEFENDANT (xxx-xxx-1405) lasting 31 minutes and 5 seconds. | 781 804 |
| 01-26-2018 | 7:56 a.m. | Email | Email from Jade Stevens to DEFENDANT. Stevens says, "After much consideration, I have decided to accept a position with another employer." | 289 |
| 01-26-2018 | 8:28 a.m. | Email | Email from DEFENDANT to Sebastian Ridley-Thomas forwarding Jade Stevens's 7:56 a.m. email. | 290 |

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|-------------|-------------|-------------|---|---|
| 01-26-2018 | 9:29 a.m. | Email | Email from Sebastian Ridley-Thomas to DEFENDANT with the "First Draft Introduction Paragraph." The body of the email refers to the "Policy, Research, and Practice Initiative." | 291 |
| 01-26-2018 | 10:12 a.m. | Email | Email from DEFENDANT to Sebastian Ridley-Thomas. The subject line is "Re: Draft First Introduction Paragraph." DEFENDANT says: "Good start. Will edit. Call me now." | 292 |
| 01-26-2018 | 10:16 a.m. | Phone Call | Outgoing call from Sebastian Ridley-Thomas (xxx-xxx-0342) to DEFENDANT (xxx-xxx-1405) lasting 10 minutes and 45 seconds. | 781 804 |
| 01-26-2018 | 10:38 p.m. | Email | Email from Sebastian Ridley-Thomas to Zaneta Smith and BCC to DEFENDANT. The subject line is "Associate Director." The email says, "The Policy, Research, and Practice Initiative." | 293 294* *BCC to DEFENDANT |
| 01-27-2018 | 8:09 a.m. | Email | Email from Sebastian Ridley-Thomas to DEFENDANT. The subject line is "Re: Associate Director." Sebastian Ridley-Thomas states: "I'd suggest a 67k offer. Formal transitioning-in would begin Monday April 2 (half time for benefits). Full time beginning Tuesday May 29. Pay day should be the 15th of every month." | 295 |
| 01-27-2018 | 8:39 p.m. | Email | Email from DEFENDANT to Sebastian Ridley-Thomas. DEFENDANT says: "Sounds good. \$67k + benefits would take her to \$80-85k. Let's chat about all of this and get it lined up properly. I'm excited, I think." | 296 |
| 01-27-2018 | 9:02 a.m. | Email | Email from Sebastian Ridley-Thomas to DEFENDANT. The attachment is titled "ZanetaSmith_CV_AACEP.pdf." | 297 |
| 01-27-2018 | 1:07 p.m. | Email | Email from Sebastian Ridley-Thomas to DEFENDANT. The attachment is titled "Fiscal Sponsor Agreement – UWCA Template .pdf." | 298 299 |
| 01-27-2018 | 3:40 p.m. | Email | Email from Sebastian Ridley-Thomas to DEFENDANT. The subject line is "Resume As Requested." | 300 |
| 01-28-2018 | 8:55 p.m. | Email | Email from DEFENDANT to himself and CC to Sebastian Ridley-Thomas. The subject line is "PRPI Description Revised." | 301 |

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|-------------|-------------|-----------------|--|-----------------|
| 01-30-2018 | -- | Check | \$100,000 check from Community Partners to the Mark Ridley-Thomas Committee for a Better L.A. dated January 30, 2018. | 542 605 |
| 02-01-2018 | 7:03 p.m. | Email | Email from Sebastian Ridley-Thomas to DEFENDANT. The subject line is "Draft Biographies." | 302 |
| 02-02-2018 | 7:45 p.m. | Email | Email from Sebastian Ridley-Thomas to DEFENDANT. The subject line is "Draft Biological Sketches." The attached document is titled "AAVREP.docx." | 77 |
| 02-02-2018 | 8:49 p.m. | Email | Email from Sebastian Ridley-Thomas to DEFENDANT. The subject line is "Next Draft." The attached document is titled "AAVREP.docx." | 78 |
| 02-03-2018 | 8:13 a.m. | Email | Email from Lance Olson to DEFENDANT and Nancy Sheehan. The subject line is "Los Angeles Times." Olson states: "No mention of SRT. There is a mention of 8 pending Assembly investigations involving staff and members. I assume Legislature is not releasing cases not 'substantiated.'" | 303 |
| 02-03-2018 | 8:09 p.m. | Email | Email from Sebastian Ridley-Thomas to DEFENDANT. The subject line is "Biography Revisions." | 79 |
| 02-03-2018 | 9:30 p.m. | Email | Email from DEFENDANT to Sebastian Ridley-Thomas. The subject line is "Re: Biography Revisions." DEFENDANT states: "Impressive. Now it needs a new pair of eyes." | 80 |
| 02-04-2018 | -- | Lobbying Report | Dean Flynn's First Quarter 2018 lobbying report lists a communication "to influence official action" with DEFENDANT on "2/4/18." | 184 |
| 02-04-2018 | 10:32 a.m. | Phone Call | Outgoing call from John Sherin (xxx-xx6-8391) to DEFENDANT (xxx-xxx-1405) lasting 7 minutes and 22 seconds. | 781 804 |
| 02-07-2018 | 12:52 a.m. | Email | Email from Sebastian Ridley-Thomas to DEFENDANT. The subject line is "2018 PRPI Budget Sketch." The attached "2018 Budget Projection" lists "TOTAL PROJECTED BUDGET: \$468,050." Under "Personnel," the document states: <i>Director (1/2 time at \$67,200.00)</i> <i>Associate Director (Full time at \$67,200.00)</i> <i>Benefit packages for both (25% of each salary: 16,400.00 x 2 = 33,600.00)</i> <i>Annual Total: \$168,000.00</i> | 304 |

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|-------------|-------------|--|--|------------------|
| 02-10-2018 | 5:12 p.m. | Phone Call | Outgoing call from John Sherin (xxx-xx6-8391) to DEFENDANT (xxx-xxx-1405) lasting 5 seconds. | 781 804 |
| 02-10-2018 | 5:29 p.m. | Phone Call | Outgoing call from DEFENDANT (xxx-xxx-1405) to John Sherin (xxx-xx6-8391) lasting 7 minutes and 50 seconds. | 781 804 |
| 02-12-2018 | 9:12 a.m. | Email | Email from Sebastian Ridley-Thomas to DEFENDANT. The subject line is "FYI...on my conversation this morning." The email says "Zaneta Smith" and "67,000.000 in salary." | 305 |
| 02-13-2018 | 6:21 a.m. | Email | Email from Mike Nichol to Sebastian Ridley-Thomas and CC to Michele Clark and Yurri Hyun. Nichol states: "Hi Sebastian, Yesterday afternoon we received the Provost approval of our request to waive our usual hiring process. The next step in the process is a standard background check. You should receive a request for information in the next day or two, please complete it as soon as you can so we can get that process started. As soon as we receive the clearance, I'll send you a draft contract for your review." | 82 |
| 02-13-2018 | 6:54 a.m. | Email <i>Count Ten Interstate Wire</i> | Email from Sebastian Ridley-Thomas to DEFENDANT forwarding Mike Nichol's 6:21 a.m. email stating "we received the Provost approval of our request to waive our usual hiring process." | 306 807 |
| 02-13-2018 | 7:05 a.m. | Email <i>Count Eleven Interstate Wire</i> | Email from DEFENDANT to Sebastian Ridley-Thomas in response to Sebastian Ridley-Thomas's 6:54 a.m. email: "👍😊". | 306 807 |
| 02-13-2018 | 11:48 a.m. | Email | DEFENDANT emails two individuals. The subject line is "Probation/RDA Report Motion." DEFENDANT says, "I'm trying to move it forward." | 307 |
| 02-13-2018 | 11:56 a.m. | Email <i>Count Twelve</i> | Email from DEFENDANT to Dean Flynn. The subject line is "Probation Reform motion." DEFENDANT says, "Would like to discuss this with you in the near term." | 83 308 807 |

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|-------------------|-------------|---------------------------|--|---|
| | | <i>Interstate Wire</i> | <p>The attached document is a “MOTION BY SUPERVISORS MARK RIDLEY-THOMAS,” dated February 13, 2018. DEFENDANT’s motion states:</p> <p><i>I THEREFORE MOVE THAT THE BOARD OF SUPERVISORS:</i></p> <ol style="list-style-type: none"> <i>Accept the seven primary recommendations made in the “Los Angeles County Probation Governance Study” (herein Resource Development Associates (RDA) Governance Study), submitted to the Board of Supervisors (Board) on February 2, 2018, excluding any recommendation that usurps current negotiations with Probation Department bargaining units.</i> <i>Direct the Ad-Hoc Taskforce created in the October 17, 2017 Ridley-Thomas – Hahn motion, which includes the Chief Executive Officer, the Chief Probation Officer, County Counsel, as well as labor representatives, to incorporate for programmatic review and fiscal analysis, the seven primary recommendations in the Ad Hoc Taskforce report due to the Board in March 2018.</i> | |
| 02-13-2018 | 12:00 p.m. | Email | DEFENDANT emails Dean Flynn and BCC’s Sebastian Ridley-Thomas. The subject line is “Don’t let this Probation Department overhaul proposal sit on the shelf.” DEFENDANT includes a link to an LA Times article and says, “Lots to discuss.” | 84 309* *BCC to Sebastian Ridley-Thomas |
| 02-13-2018 | 4:16 p.m. | Email | Email from USC to Sebastian Ridley-Thomas. The subject line is “Your Aetna Student Health Insurance Toolkit.” The email states: “Dear USC Student, As a student on the USC Aetna Student Health Insurance Plan, we want to ensure you know how to access your insurance and the many helpful tools that are available to you.” | 85 |
| 02-13-2018 | 4:52 p.m. | Email <i>Count</i> | Email from Dean Flynn to DEFENDANT in response to DEFENDANT’s 11:56 a.m. email. The subject line is “RE: Probation Reform motion.” Dean Flynn states: “I am just catching up with this, and of course would be very interested in | 86 310 807 |

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|-------------------|-------------|---|---|------------------|
| | | <i>Thirteen Interstate Wire</i> | talking with you about the vision and how we can help, if possible. I had an excellent meeting last night with John Sherin and Bobby Cagle. We are going to explore the use of WET funds for possible support of graduate students in social work and other disciplines this Spring. I was very encouraged." Dean Flynn states: "Thank you for facilitating all these important relationships and opportunities." | |
| 02-13-2018 | 4:54 p.m. | Email | Email from Dean Flynn to Jacquelyn McCroskey. Dean Flynn states: "Had a long meeting at the City Club last night with Bobby Cagle and John Sherin. Teri canceled at the last minute. We are off to a marvelous start, thanks to MRT." | 87 |
| 02-14-2018 | 10:47 p.m. | Email | Email from Sebastian Ridley-Thomas to DEFENDANT. The subject line is "100k by 2/28/18 for PRPI." Sebastian Ridley-Thomas states, "100k Needed at UWC February 28 (405k in Potential Identified)." | 311 |
| 02-14-2018 | 11:12 p.m. | Email | Email from DEFENDANT to Sebastian Ridley-Thomas in response to Sebastian Ridley-Thomas's 10:47 p.m. email. The subject line is "Re: 100k by 2/28/18 for PRPI." DEFENDANT's email has a thumbs up, green checkmark, and other emoji. | 312 |
| 02-19-2018 | 7:01 p.m. | Phone Call | Outgoing call from John Sherin (xxx-xx6-8391) to DEFENDANT (xxx-xxx-1405) lasting 7 minutes and 58 seconds. | 781 804 |
| 02-23-2018 | 11:39 a.m. | Email | Email from Marlene Wong to Dean Flynn. Wong states: "An important amendment to the Telehealth DMH Contract is going before the County Board of Supervisors next week. I've summarized the proposal below. Would it be helpful if MRT knew about this in advance since he helped initiate the Contract a few years ago. It would help to get these changes approved to release us from the stranglehold of the terms negotiated by the previous administration of Telehealth." | 314 |
| 02-23-2018 | 8:01 p.m. | Email <i>Count Fourteen Interstate</i> | Email from Dean Flynn to DEFENDANT forwarding Marlene Wong's 11:39 a.m. email. The subject line is "FW: Telehealth Amendment going to the County Board of Supervisors next week." Dean Flynn states: "I hope to have an opportunity to speak with you, but in | 91 314 807 |

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|-------------------|-------------|---|---|---|
| | | <i>Wire</i> | case I am not successful for some reason, I wanted to bring to your attention an extremely important request for contract amendment that will be on the Board's agenda next week, I believe. This is our TeleHealth contract with DMH, which was negotiated while Marv Southard was Director. It contains clauses that have been severely limited our ability to offer help to young persons who need it most. Further, we greatly need to expand billable services and to increase the flat rate for services to a level comparable to other county contract agencies." | |
| 02-23-2018 | 8:48 p.m. | Email <i>Count Fifteen Interstate Wire</i> | Email from DEFENDANT to Dean Flynn and BCC to Sebastian Ridley-Thomas. In response to Dean Flynn's 8:01 p.m. email, DEFENDANT says, "Your wish is my command." | 92 315* 807 *BCC to Sebastian Ridley-Thomas |
| 02-24-2018 | 7:51 a.m. | Email | Email from Dean Flynn to DEFENDANT. In response to DEFENDANT's "Your wish is my command" email, Dean Flynn writes: "Thank you for staying in touch on these matters. I deeply appreciate it." | 93 |
| 02-26-2018 | 5:04 p.m. | Email | Email from DEFENDANT to Emily Williams forwarding Dean Flynn's 7:51 a.m. DEFENDANT says, "FYI." | 316 |
| 02-26-2018 | 5:57 p.m. | Email | Email from Emily Williams to DEFENDANT in response to DEFENDANT's 5:04 p.m. email. Williams states: <i>I have found a hard copy of the board letter expressing DMH's intent to extend its sole source agreement with USC to provide ongoing tele-mental health services to children and TAY. However, there is no amendment mentioned—only a one-year extension that will 'allow DMH additional time to assess the effectiveness' of the program.</i> <i>The letter came to health cluster last week and is dated February 21, 2018. It does not require action from the Board, so it will not appear on a future board</i> | 316 |

| <u>DATE</u> | <u>TIME</u> | <u>TYPE</u> | <u>DESCRIPTION</u> | <u>EXHIBITS</u> |
|-------------------|-------------|-------------|---|-----------------|
| | | | <p><i>agenda. However, the letter is required by Board Policy No. 5.100 in order for DMH to begin negotiating with USC on the terms of the new agreement.</i></p> <p><i>The agreement with USC expires on August 31, 2018. I recommend that we do the following:</i></p> <ol style="list-style-type: none"> <i>1. I can connect with Dhakshike on the importance of this contract so that we can monitor progress on the terms described by Dr. Wong below.</i> <i>2. We can take the temperature of the other board offices to find out if there is any reluctance to continue this agreement.</i> <p><i>I'm happy to connect with you at the board meeting tomorrow if you'd like to discuss further.</i></p> | |
| 02-27-2018 | 6:32 p.m. | Email | Email from DEFENDANT to Emily Williams. In response to Williams's 5:57 p.m. email, DEFENDANT says, "We should have a follow up." | 316 |
| 02-27-2018 | 7:27 p.m. | Phone Call | Outgoing call from DEFENDANT (xxx-xxx-1405) to Dean Flynn (xxx-xxx-3873) lasting 10 minutes and 9 seconds. | 781 804 |
| 02-28-2018 | 1:40 p.m. | Phone Call | Outgoing call from DEFENDANT (xxx-xxx-1405) to Dean Knott (xxx-xxx-6057) lasting 25 seconds. | 781 804 |
| 02-28-2018 | 6:28 p.m. | Phone Call | Outgoing call from DEFENDANT (xxx-xxx-1405) to John Sherin (xxx-xx6-8391) lasting 26 seconds. | 781 804 |
| 02-28-2018 | 8:24 p.m. | Phone Call | Outgoing call from DEFENDANT (xxx-xxx-1405) to Dean Knott (xxx-xxx-6057) lasting 14 minutes and 55 seconds. | 781 804 |
| 02-28-2018 | 9:07 p.m. | Phone Call | Outgoing call from DEFENDANT (xxx-xxx-1405) to Dean Knott (xxx-xxx-6057) lasting zero seconds. | 781 804 |
| 03-01-2018 | 7:33 a.m. | Phone Call | Outgoing call from John Sherin (xxx-xx6-8391) to DEFENDANT (xxx-xxx-1405) lasting 42 seconds. | 781 804 |
| 03-01-2018 | 10:38 a.m. | Phone Call | Outgoing call from DEFENDANT (xxx-xxx-1405) to John Sherin (xxx-xx6-8391) lasting 23 seconds. | 781 804 |

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|-------------|-------------|-------------|---|-----------------|
| 03-01-2018 | 10:39 a.m. | Phone Call | Outgoing call from John Sherin (xxx-xx6-8391) to DEFENDANT (xxx-xxx-1405) lasting 5 minutes and 38 seconds. | 781 804 |
| 03-05-2018 | 8:25 a.m. | Email | Email from to Sebastian Ridley-Thomas to DEFENDANT. In the below email in the chain, Sebastian Ridley-Thomas is now listed as the "Chief Strategist" for the "African American Voter, Registration, Education, and Participation Committee." | 317 |
| 03-05-2018 | 10:57 a.m. | Email | Email from Mike Nichol to Sebastian Ridley-Thomas and CC to Yurri Hyun. Nichol states: "I've got great news, the background check is completed, so I'll have the contract sent to you by Yurri as soon as we have signatures from the two deans (should be a couple of days max). We'll set the start date as soon as is practical, probably March 19th." | 94 |
| 03-05-2018 | 11:12 a.m. | Email | Email from Sebastian Ridley-Thomas to DEFENDANT forwarding Mike Nichol's 10:57 a.m. email. | 318 |
| 03-05-2018 | 12:38 p.m. | Email | Email from Michele Clark to Dean Flynn. In the forwarded email from Mike Nichol, Nichol states: "We have just been notified that Sebastian's background check has been completed successfully. We're going to revise his offer letter to have him start mid-March, and then Yurri will get it over to you for Marilyn's signature." | 95 |
| 03-05-2018 | 7:43 p.m. | Phone Call | Outgoing call from John Sherin (xxx-xx6-8391) to DEFENDANT (xxx-xxx-1405) lasting 6 seconds. | 781 804 |
| 03-05-2018 | 8:02 p.m. | Phone Call | Outgoing call from DEFENDANT (xxx-xxx-1405) to John Sherin (xxx-xx6-8391) lasting 7 seconds. | 781 804 |
| 03-05-2018 | 8:31 p.m. | Phone Call | Outgoing call from John Sherin (xxx-xx6-8391) to DEFENDANT (xxx-xxx-1405) lasting 16 minutes and 35 seconds. | 781 804 |
| 03-06-2018 | 6:26 a.m. | Email | Email from Sebastian Ridley-Thomas to Yurri Hyun and CC to Mike Nichol with his mailing address. | 96 |
| 03-07-2018 | 5:31 a.m. | Email | Email from DEFENDANT to Sebastian Ridley-Thomas: "I have an idea. 😊" | 319 |

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|-------------|-------------|--|---|-------------------------|
| 03-09-2018 | -- | Contract | The "FISCAL SPONSORSHIP AGREEMENT" between United Ways of California and PRPI. The signature from Peter Manzo is dated "3.9.2018." The signature from Sebastian Ridley-Thomas is dated "January 27, 2018." | 408 |
| 03-09-2018 | -- | Mailing <i>Count Four Mailing</i> | The offer letter for the position of "Professor of the Practice of Policy and Social Work" is mailed to Sebastian Ridley-Thomas on or about March 9, 2018. The offer letter states: "Since you are being appointed at 50% effort, your annual university salary will be \$50,000. Funding for this position is provided by the Price School (50%) and the Dworak-Peck School (50%)." | 90 491 492 806 |
| 03-09-2018 | 9:01 a.m. | Phone Call | Outgoing call from Bobby Cagle (xxx-xxx-3878) to Dean Flynn (xxx-xxx-3873) lasting 4 minutes and 30 seconds. | 672 804 |
| 03-09-2018 | 9:06 a.m. | Phone Call | Outgoing call from Bobby Cagle (xxx-xxx-3878) to Dean Flynn (xxx-xxx-3873) lasting 4 minutes and 7 seconds. | 672 804 |
| 03-13-2018 | 10:27 a.m. | Email | Email from Sebastian Ridley-Thomas to DEFENDANT. Sebastian Ridley-Thomas states, "For personal vacation..." The email lists the following: "May 24-28 Local trip (possibly Disneyland);" "June 8-12 Grand Canyon;" "July 1-9 Disney World – Orlando, FL;" "July 20-24 NYC;" "August 9-14 Alaska;" and "November 9-19 TakeTEN." | 320 |
| 03-13-2018 | 11:26 a.m. | Email | Email from DEFENDANT to Sebastian Ridley-Thomas: "Seems like a lot." | 320 |
| 03-13-2018 | 11:30 a.m. | Email | Email from Sebastian Ridley-Thomas to DEFENDANT: "In a regular year, I hope to have eight such travels." | 320 |
| 03-13-2018 | 11:39 a.m. | Email | Email from DEFENDANT to Sebastian Ridley-Thomas: "Vacations are costly and time-consuming." | 320 |
| 03-14-2018 | -- | Lobbying Report | Dean Flynn's First Quarter 2018 lobbying report lists a communication "to influence official action" with Bobby Cagle on "3/14/18." | 184 |
| 03-15-2018 | 10:56 p.m. | Email | Email from Sebastian Ridley-Thomas to Dean Flynn. The subject line is "Checking In—Office Space." Sebastian Ridley-Thomas says, "I will be leading the Policy, Research, and Practice Initiative (PRPI), a project of the United Ways of California." Sebastian Ridley-Thomas states: "We are considering our space options and wondered if you might help us think about a 500-800 square foot | 99 |

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| | | | enclosed space we might furnish for two. Downtown Los Angeles is an ideal location for such an office and USC City Center would be a dream come true.” | |
| 03-16-2018 | 7:42 a.m. | Email | Email from Dean Flynn to Sebastian Ridley-Thomas. The subject line is “RE: Checking In—Office Space.” Dean Flynn states: “Let me explain what we have available. It may or may not meet your needs. I have an area on the 14th floor City Center[.]” Dean Flynn further states: “Michele can give you a mini-tour if you would like to pursue this further.” | 99 |
| 03-17-2018 | 11:59 p.m. | Email | Email from Sebastian Ridley-Thomas to DEFENDANT. The subject line is “Zaneta Smith Offer Letter. Sebastian Ridley-Thomas says, “DRAFT...Comments Encouraged.” The salary is listed at \$67,000. | 322 |
| 03-18-2017 | 10:10 a.m. | Email | Email from Sebastian Ridley-Thomas to DEFENDANT. The subject line is “Re: Zaneta Smith Offer Letter.” Sebastian Ridley-Thomas says, “Updated sentence addition.” The start date is listed as May 29th. | 323 |
| 03-19-2018 | -- | Lobbying Report | Dean Flynn’s First Quarter 2018 lobbying report lists a communication “to influence official action” with Bobby Cagle on “3/19/18.” | 184 |
| 03-30-2018 | 11:59 p.m. | Email | Email from DEFENDANT to Sebastian Ridley-Thomas. The subject line is “Re: Draft USC Price Page.” An email from Sebastian Ridley-Thomas contained therein with his “Bio paragraph(s)” states: “The Honorable Sebastian Ridley-Thomas (Ret.) is Adjunct Professor at the University of Southern California (USC) Sol Price School of Public Policy and Suzanne Dworak-Peck School of Social Work.” The email further states: “He is also Director of the Policy, Research, and Practice Initiative (PRPI), one of California’s prominent polling organizations.” | 324 |
| 04-01-2018 | 10:30 a.m. | Email | Email from Marleen Wong to Dean Flynn and John Clapp. Wong states: “It’s the financial barriers that prevent us (Telehealth Clinic) from offering these services now. We’re on ‘operation survival’ attempting to make USC Telehealth self-sustaining in one year with a focus on maximizing our contract reimbursed services.” | 101 |
| 04-01-2018 | 10:55 a.m. | Email | Email from Dean Flynn to Marleen Wong and John Clapp in response to Wong’s 10:30 a.m. email. Dean Flynn states: “Marleen, someone (maybe | 101 |

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|-------------|-------------|-------------|--|-----------------|
| | | | Nadia) should be paying attention to Board motions and then working with me or John to follow up with Supervisor Mark Ridley Thomas and John Sherin. The Supervisor told me that the Board is adopting a motion that will open the way to negotiation in August for a new contract that would allow us to move forward. I think at the moment the three of us need a better strategy for ensuring that we don't lose this very important opportunity. Do you ever talk with the mental health deputy or the children's deputy for MRT? We are approaching a very critical point, and he will help us, but we have to be on top of these developments." | |
| 04-01-2018 | 3:11 p.m. | Email | Email from Marleen Wong to Dean Flynn and John Clapp regarding "Telehealth." Wong states: "Our most recent effort has been to expand the DMH contract in several significant ways are highlighted in the final 'draft' of the attached Scope of Work which we submitted to DMH for Board of Supervisors approval in August." Wong states: "The current contract allows for us to bill for children and youth ages 12 to 22...In our amendment, we eliminated the age limit of 22." Wong further states, "The reimbursement rate is increased from \$89 to \$120 per 45 minute session." | 102 |
| 04-01-2018 | 4:02 p.m. | Email | Email from Dean Flynn to Marleen Wong: "I sent all of the recommendations to MRT. The result was a Board motion that made possible renegotiation of the current contract in AUGUST this year. You'll need to stay on track with your colleagues at DMH to be sure that we engage at the correct point." | 103 |
| 04-01-2018 | 6:59 p.m. | Email | Email from Marleen Wong to Dean Flynn: "Telehealth survival is a priority. I will continue to monitor the progress of our amendment. Thank you for creating the support and communication at the higher levels of DMH." | 103 |
| 04-14-2018 | 7:44 p.m. | Email | Email from DEFENDANT to Sebastian Ridley-Thomas. In response to an email with a link to Sebastian Ridley-Thomas's biography posted on the USC Price School of Public Policy website, DEFENDANT says, "Bam!" | 326 |
| 04-16-2018 | 8:23 a.m. | Email | Email from Sebastian Ridley-Thomas to DEFENDANT. The subject line is "AAVREP Bio." | 328 |

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|-------------|-------------|-------------|--|-----------------|
| 04-16-2018 | -- | Email | Email from Dean Flynn to Lynn Tamayo. Dean Flynn states that she had a call with DEFENDANT on April 16, 2018. | 168 |
| 04-20-2018 | 6:06 p.m. | Phone Call | Outgoing call from DEFENDANT (xxx-xxx-1405) to Dean Flynn (xxx-xxx-3873) last 33 seconds. | 781 804 |
| 04-20-2018 | 6:07 p.m. | Phone Call | Outgoing call from DEFENDANT (xxx-xxx-1405) to Dean Flynn (xxx-xxx-3873) last 15 seconds. | 781 804 |
| 04-20-2018 | 6:08 p.m. | Email | Email from DEFENDANT to Dean Flynn: "Please call me." | 329 |
| 04-21-2018 | 8:53 a.m. | Email | Email from Dean Flynn to DEFENDANT: "Will certainly do so...but which number?" | 330 |
| 04-22-2018 | 7:44 a.m. | Phone Call | Outgoing call from John Sherin (xxx-xx6-8391) to DEFENDANT (xxx-xxx-1405) lasting 3 minutes and 50 seconds. | 781 804 |
| 04-22-2018 | 10:33 a.m. | Phone Call | Outgoing call from DEFENDANT (xxx-xxx-1405) to Dean Flynn (xxx-xxx-2959) lasting 18 seconds. | 781 804 |
| 04-22-2018 | 10:34 a.m. | Phone Call | Outgoing call from DEFENDANT (xxx-xxx-1405) to Dean Flynn (xxx-xxx-3873) lasting 46 minutes and 24 seconds. | 781 804 |
| 04-23-2018 | 8:19 p.m. | Phone Call | Outgoing call from John Sherin (xxx-xx6-8391) to Dean Flynn (xxx-xxx-3873) lasting 1 minute and 15 seconds. | 672 804 |
| 04-23-2018 | 8:20 p.m. | Voicemail | Voicemail from John Sherin to Dean Flynn: <i>"Hello, Marilyn. It's John Sherin, DMH, giving you a call. I'm very sorry it's kind of late, uh, but busy days. Anyway, I had the pleasure of spending some time with Supervisor Ridley-Thomas today, and he, uh, kind of gave me the heads up that, uh, we're not making progress, which to me is a big surprise, um. It's something I check on regularly, and I've been told that, uh, things are moving forward, so obviously, um, I'm not getting accurate information from my team, and I would love to hear from you directly about, uh, your perspective and your experience with things, um, as they're unfolding in real time, so please give me a call, and I look forward to, uh, talking and, um, hopefully seeing you before, uh, before the summer. I hope you're doing great, Marilyn. Talk soon, bye bye."</i> | 196 809 |

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|-------------|-------------|-------------------------|--|-----------------|
| 04-26-2018 | -- | Email + Lobbying Report | Dean Flynn's Second Quarter 2018 lobbying report lists a communication "to influence official action" with DEFENDANT on "4/26/18." The description states: "to learn in general how the county worked with universities and other organizations in meeting county needs for new programs, evaluation, and other services. I also met with him to discuss a gift agreement." | 167 187 |
| 04-26-2018 | 4:30 p.m. | Calendar Entry | Calendar entry from Dean Flynn's cell phone: "4:30pm – Supervisor Mark Ridley Thomas." The date listed is "4/26/2018." | 192 810 |
| 04-26-2018 | -- | Email | Email from Dean Flynn to Lynn Tamayo. Dean Flynn states that she had a call with DEFENDANT on April 26, 2018. | 168 |
| 04-26-2018 | 6:01 p.m. | Email | Email from Sebastian Ridley-Thomas to DEFENDANT with a document titled "ZanetaSmith_CV_AACEP." | 331 |
| 04-26-2018 | 6:02 p.m. | Email | Email from DEFENDANT to Sebastian Ridley-Thomas: "Thank you." | 332 |
| 04-26-2018 | 6:04 p.m. | Email | Email from DEFENDANT to Dean Flynn with a document titled "ZanetaSmith_CV_AACEP." DEFENDANT says: "As discussed. Thank you." | 333 |
| 04-27-2018 | 11:12 a.m. | Email | Email from Maryrose McMahon to Sebastian Ridley-Thomas and Peter Manzo. McMahon states: "Good morning, Sebastian! Pete shared with me the good news about your grant from the USC Dworak-Peck School of Social Work – congratulations to you! In case USC wants to send funds directly, I have attached our bank wiring instructions along with our IRS Exemption Letter for your review." | 334 |
| 04-27-2018 | 2:27 p.m. | Phone Call | Outgoing call from DEFENDANT (xxx-xxx-1405) to Dean Flynn (xxx-xxx-8311) lasting 1 minute and 16 seconds. | 781 804 |
| 04-27-2018 | 2:29 p.m. | Phone Call | Outgoing call from DEFENDANT (xxx-xxx-1405) to Dean Flynn (xxx-xxx-3873) lasting 8 minutes and 51 seconds. | 781 804 |
| 04-27-2018 | 8:49 p.m. | Phone Call | Outgoing call from Dean Flynn (xxx-xxx-3873) to John Sherin (xxx-xx6-8391) lasting 5 seconds. | 672 804 |
| 04-29-2018 | 9:06 a.m. | Email | Email from Dean Flynn to Michele Clark. The subject line is "New assignments." Dean Flynn says, "Continuing work with Sebastian Ridley Thomas, especially on PIRI." | 106 |

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|-------------|-------------|--|---|---|
| 05-02-2018 | -- | Letter and Check | <p>\$100,000 check to the USC School of Social Work from the Mark Ridley-Thomas Committee for a Better L.A. The cover letter states:</p> <p><i>Dear Dean Flynn:</i></p> <p><i>Please find enclosed tangible acknowledgement of the important work of the Suzanne Dworak Peck School of Social Work in Los Angeles and beyond. As Dean, these funds can be used at your discretion in order to best facilitate the impressive policy and practical work of the School and its impact in the community.</i></p> <p><i>I look forward to witnessing and supporting the Schools continuing achievements.</i></p> <p><i>With hope,</i> MARK RIDLEY-THOMAS <i>Supervisor, Second District</i></p> <p><i>Enclosure</i> <i>(\$100,000.00 check #1168)</i></p> | 107 |
| 05-03-2018 | 2:22 p.m. | Phone Call | Outgoing call from DEFENDANT (xxx-xxx-1405) to Dean Flynn (xxx-xxx-8311) lasting 4 minutes and 25 seconds. | 781 804 |
| 05-03-2018 | 9:20 p.m. | Email | Email from Sebastian Ridley-Thomas to DEFENDANT forwarding Maryrose McMahon's April 27, 2018 email with the IRS and donor information for United Ways of California. | 334 |
| 05-03-2018 | 10:19 p.m. | Email <i>Count Sixteen Interstate</i> | Email from DEFENDANT to Dean Flynn and BCC to Sebastian Ridley-Thomas. DEFENDANT states: "Attached is the information you requested. At this point it is necessary to act with dispatch so as to facilitate the completion of Ms. Smith's on-boarding with the United Way in a timely manner – no later than | 108 335* 807 *BCC to Sebastian |

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| | | <i>Wire</i> | May 15th." Attached to the email are the IRS and donor information for United Ways of California. | Ridley-Thomas |
| 05-03-2018 | 10:27 p.m. | Email <i>Count Seventeen Interstate Wire</i> | Email from Dean Flynn to DEFENDANT in response to DEFENDANT's 10:19 p.m. "act with dispatch" email. Dean Flynn states: "MRT, If that is the case, then we definitely cannot use the option of a university appointment, at least this year. However, I will adopt another course of action tomorrow morning and assume the person we are to contact is Maryrose McMahon. I will let people know that this must be expedited." | 336 807 |
| 05-03-2018 | 10:34 p.m. | Email | Email from Dean Flynn to Michele Clark and CC to Carmen Frierson. Dean Flynn states: "I will explain later, but it is urgent that we issue a sponsorship to the United Way of California for \$100,000 and that it be received by May 15th if at all possible. I will explain the reason for haste when I speak to you tomorrow morning." | 110 |
| 05-03-2018 | 11:02 p.m. | Email | Email from DEFENDANT to Dean Flynn and BCC to Sebastian Ridley-Thomas. DEFENDANT's email is in response to Dean Flynn's 10:27 p.m. email in which she states that she will "let people know that this must be expedited." DEFENDANT says: "Thank you so much. Let's try to touch base by noon tomorrow." | 111 337* *BCC to Sebastian Ridley-Thomas |
| 05-04-2018 | 8:16 a.m. | Email | Email from Dean Flynn to DEFENDANT in response to DEFENDANT's 11:02 p.m. email from the night before. Dean Flynn states: "I won't be able to give you further information until about 1:00 pm...Part of the issue here is that the sponsorship will have to move through the university payroll office over which we have very little control. I can guarantee that we will fulfill our part of the transaction today, but can only nag and nip at people's heels at the higher administrative levels. If May 15th is a drop dead date, then I will need to understand a little more so that I can figure out what to do about bridge funds. (I actually have an idea already.)" | 112 339 |
| 05-04-2018 | 9:21 a.m. | Email | Email from Michele Clark to Dean Flynn and CC to Carmen Frierson. In response to Dean Flynn's 10:35 p.m. email from the night before regarding a "sponsorship to the United Way of California for \$100,000," Clark states: | 113 |

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| | | | “Unfortunately I don’t have that amount in my account, so I believe this will have to be handled by Lynn through the main office account. Given Lynn is on vacation I can reach out to Adriana to attempt to get this payment started.” | |
| 05-04-2018 | 9:29 a.m. | Phone Call | Outgoing call from DEFENDANT (xxx-xxx-1405) to Dean Flynn (xxx-xxx-3873) lasting 8 minutes and 41 seconds. | 781 804 |
| 05-04-2018 | -- | Email | Email from Dean Flynn to Lynn Tamayo. Dean Flynn states that she had a call with DEFENDANT on May 4, 2018. | 168 |
| 05-04-2018 | -- | Voicemail | Voicemail from DEFENDANT to Peter Manzo. DEFENDANT says, “Be kind enough to give me a call, I’d appreciate it...Time-sensitive.” | 432 |
| 05-04-2018 | 10:55 a.m. | Email | Email from DEFENDANT to Peter Manzo with the subject line: “Message from Mark Ridley-Thomas. Please confirm receipt.” | 338 |
| 05-04-2018 | 11:13 a.m. | Email | Email from DEFENDANT to Peter Manzo. The attached document is titled “ZanetaSmith_CV_AACEP.pdf.” DEFENDANT says: “1. Please find the resume we discussed. No need for you to contact her yet. 2. I await your on-boarding pdf for review. 3. Dean Marilyn Flynn of USC will follow up with you on the financial details. All good.” | 340 |
| 05-04-2018 | 11:39 a.m. | Email | Email from DEFENDANT to Dean Flynn. DEFENDANT states: “I have spoken with Peter Manzo, President/CEO United Ways of California, fiscal agent for PRPI. Please call him and assure him of the School’s commitment and that you have begun the funds transfer process.” | 341 |
| 05-04-2018 | 12:03 p.m. | Email | Email from Sebastian Ridley-Thomas to DEFENDANT. The subject line is “Zaneta Smith Offer Letter.” The attached letter for the position of “Associate Director” states: “Start date would be Tuesday May 29 th . The employer of record is the United Ways of California, the wage is \$67,000.00.” | 342 |
| 05-04-2018 | 12:29 p.m. | Email | Email from DEFENDANT to Peter Manzo. The attached document is titled “ZJSOfferLtr.docx.” DEFENDANT states: “Here’s the offer Ms. Smith received and accepted with the salary adjustment of \$70k as we discuss earlier. It is my understanding that the USC financial support comes in at \$100k.” | 343 |
| 05-04-2018 | 12:36 p.m. | Email | Email from Adriana Gonzalez to Dean Flynn and CC to Carmen Frierson. Gonzalez states: “Dean Flynn, I have attached a vendor invoice as a template | 116 |

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| | | | to demonstrate what the invoice should look like from United Way. Invoice should include a description indicating that the funds will be used by June 30,2018 in order for payment to be released from the current fiscal year.” | |
| 05-04-2018 | 12:50 p.m. | Email | Email from Dean Flynn to DEFENDANT. Dean Flynn states: “I am happy to say that I think we can expedite this so that the funds are available by May 18th. I have wonderful people here in the school, they have great relationships in the university, and I think the path looks clear.” | 344 |
| 05-04-2018 | 12:55 p.m. | Email | Email from Dean Flynn to Peter Manzo. The subject line is “Transfer of funds – urgent.” Dean Flynn says: “Supervisor Ridley Thomas gave me your contact information. I did try to call but the attempt went to voice mail. I do need to speak with you about a letter that will be required from you before we can begin transfer of funds. I have a template that I can send you to facilitate this – and can send it today, but want to confirm first that you understand the process that we will need to follow. I think we can expedite processing so that funds from USC will be available to the United Way by May 18 th IF we can begin today.” | 118 |
| 05-04-2018 | 12:58 p.m. | Email | Email from Peter Manzo to Dean Flynn and Maryrose McMahon. The subject line is “Re: Transfer of funds – urgent.” Manzo states: “I’ve copied Maryrose McMahon, our Program Assistant, here on this message, she can help us with all this.” | 119 |
| 05-04-2018 | 1:01 p.m. | Email | Email from Peter Manzo to DEFENDANT in response to DEFENDANT’s 12:29 p.m. email regarding the offer letter for Zaneta Smith. Manzo states: “Supervisor Ridley-Thomas, Thank you for sending this, I have received it. I have also received an email message from Dean Flynn, we are working on a letter she will require from us in order to transmit the funds.” | 345 |
| 05-04-2018 | 1:02 p.m. | Email | Email from Dean Flynn to Peter Manzo in response to Manzo’s 12:58 p.m. email. Dean Flynn says, “Will do!” | 120 |
| 05-04-2018 | 1:04 p.m. | Email | Email from Maryrose McMahon to Peter Manzo and CC to Dean Flynn. The subject line is “Re: Transfer of funds – urgent.” McMahon says, “Hi Marilyn, Nice to meet you and happy to help.” | 121 |

| <u>DATE</u> | <u>TIME</u> | <u>TYPE</u> | <u>DESCRIPTION</u> | <u>EXHIBITS</u> |
|-------------|-------------|-------------|---|-----------------|
| 05-04-2018 | 2:05 p.m. | Email | Email from DEFENDANT to Peter Manzo: "Got it." | 346 |
| 05-04-2018 | 2:06 p.m. | Email | Email from DEFENDANT to Dean Flynn. In response to Dean Flynn's 12:50 p.m. email in which she says "I think we can expedite this so that the funds are available by May 18th," DEFENDANT says: "You're the best!" | 347 |
| 05-04-2018 | 2:10 p.m. | Email | Email from Dean Flynn to DEFENDANT: "Let's wait until after May 18th to confirm that statement." | 348 |
| 05-04-2018 | 2:13 p.m. | Email | Email from Dean Flynn to Adriana Gonzalez: "Thank you so much!" | 124 |
| 05-04-2018 | 2:25 p.m. | Email | Email from Dean Flynn to Maryrose McMahon with the vendor invoice template. | 436 |
| 05-04-2018 | 2:43 p.m. | Email | Email from Maryrose McMahon to Dean Flynn, Adriana Gonzalez, and Siemuy Lim. McMahon states: "Please let me know if the attached draft invoice looks OK, or if you need us to make any revisions." The amount in the invoice is "\$100,000.00." The description in the invoice states: "Sponsorship for 2018 PRPI CA Survey Total commitment of \$100,000 will be spent prior to 6/30/18." | 125 |
| 05-04-2018 | 2:50 p.m. | Email | Email from Dean Flynn to Adriana Gonzalez. Dean Flynn forwards the "draft invoice" from Maryrose McMahon and states: "Adriana – will this do it?" | 126 |
| 05-04-2018 | 2:53 p.m. | Email | Email from Adriana Gonzalez to Dean Flynn: "Yes. I am just waiting for the university to verify I can pay the vendor based on the profile on file." | 128 |
| 05-04-2018 | 2:53 p.m. | Email | Email from Dean Flynn to Maryrose McMahon and CC to Peter Manzo. In response to McMahon's 2:44 p.m. email asking "if the attached draft invoice looks OK," Dean Flynn states: "Yep! It's great! Now all Adriana has to do is to insure that the vendor information we have on file and the tax ID number match at the University, and Adriana can process the check. She will also track its progress through the university so that we can be sure that it arrives in a timely way." | 127 |
| 05-04-2018 | 2:57 p.m. | Email | Email from Dean Flynn to DEFENDANT. The subject line is "On its way..." Dean Flynn states: "...payment should be received by May 18 th ." | 349 |
| 05-04-2018 | 3:25 p.m. | Email | Email from DEFENDANT to Dean Flynn. The subject line is "Re: On its way..." DEFENDANT states: "I repeat: You're the best!!!" | 350 |

| <u>DATE</u> | <u>TIME</u> | <u>TYPE</u> | <u>DESCRIPTION</u> | <u>EXHIBITS</u> |
|-------------|-------------|----------------|---|-----------------|
| 05-04-2018 | 5:01 p.m. | Email | Email from Adriana Gonzalez to Dean Flynn and CC to Carmen Frierson and Lynn Tamayo. Gonzalez states: "We are a few steps ahead, the invoice is ready and I think we can process this check in 7 business days." | 133 |
| 05-04-2018 | -- | Signed Invoice | The signed invoice for the \$100,000 payment from USC to United Ways of California. The amount in the invoice is "\$100,000.00." The description in the invoice states: "Sponsorship for 2018 PRPI CA Survey Total commitment of \$100,000 will be spent prior to 6/30/18." | 135 |
| 05-07-2018 | 10:02 a.m. | Email | Email from Dean Flynn to Maryrose McMahon and CC to Peter Manzo. The subject is "update on our sponsorship." Dean Flynn states: "...it will be 7 business days before you receive payment – that is, next week, by Tuesday or Wednesday at the latest." | 137 |
| 05-07-2018 | 11:23 a.m. | Email | Email from Dean Flynn to Maryrose McMahon: "We do have to set you up as a new vendor, and Adriana is working on it with lots of other people to get this done." | 138 |
| 05-08-2018 | -- | Report | USC Disbursement Voucher Report for the \$100,000 payment to United Ways of California. The "Business Purpose" is listed as "Sponsorship: United Ways of California Support for 2018 PRPI CA Survey- Los Angeles California. Approved by Dean Marilyn Flynn, USC Suzanne Dworak-Peck School of Social Work." | 141 |
| 05-08-2018 | -- | Report | Notes and Attachments to the USC Disbursement Voucher Report for the \$100,000 payment to United Ways of California. | 142 |
| 05-08-2018 | 10:11 a.m. | Report | USC Disbursement Voucher Document Overview for the \$100,000 payment to United Ways of California. The "Explanation" and "Business Purposes" sections state: "Sponsorship: United Ways of California Support for 2018 PRPI CA Survey- Los Angeles California. Approved by Dean Marilyn Flynn, USC Suzanne Dworak-Peck School of Social Work." | 143 |
| 05-08-2018 | 10:17 a.m. | Email | Dean Flynn receives an "Action List Reminder" regarding the USC Disbursement Voucher for the \$100,000 payment to United Ways of California. | 145 |
| 05-08-2018 | 10:21 a.m. | Email | Email from Adriana Gonzalez to Dean Flynn and CC to Carmen Frierson, James Earl Kelly, and Lynn Tamayo. Gonzalez says: "The request for UNITED WAYS OF CALIFORNIA has been submitted. Please log in and approve at your earliest | 146 |

| <u>DATE</u> | <u>TIME</u> | <u>TYPE</u> | <u>DESCRIPTION</u> | <u>EXHIBITS</u> |
|-------------|-------------|--|---|--------------------------|
| | | | convenience. Once the check is printed I will pick it up and overnight it to the organization." | |
| 05-08-2018 | 5:14 p.m. | Email | Email from Dean Flynn to DEFENDANT: "Just to keep you updated: The check will be overnight mailed to United Ways of America this Friday, to arrive on Monday. Everything has been cleared." | 149 351 |
| 05-08-2018 | 5:24 p.m. | Email | Email from DEFENDANT to Dean Flynn: "Shall I restate my assertion about you or do you now believe that I speak with authority from on high? 😊 I look forward to seeing you on Thursday for the homeless meeting." | 352 |
| 05-08-2018 | 10:19 p.m. | Email | Email from Dean Flynn to DEFENDANT: "This one was easy. Sort of." | 353 |
| 05-08-2018 | -- | Email | Email from Dean Flynn to Lynn Tamayo. Dean Flynn states that she had a call with DEFENDANT on May 8, 2018. | 168 |
| 05-09-2018 | -- | Check | The \$100,000 check from USC to United Ways of California is dated May 9, 2018. | 419 |
| 05-10-2018 | -- | Mailing <i>Count Five Mailing</i> | The \$100,000 check from USC to United Ways of California is mailed via FedEx on May 10, 2018 and delivered on May 11, 2018. | 153 154 494 806 |
| 05-10-2018 | -- | Email + Lobbying Report | Dean Flynn's Second Quarter 2018 lobbying report lists a May 10, 2018 communication "to influence official action" between Dean Flynn and John Sherin. The description states: "to understand the process of establishing an affiliation agreement for schools at USC and to get an update on the timing of renegotiation for our TeleHealth contract. I also discussed possibilities for crossover youth training for all LA County schools of social work and inquired about DMH interest in new veterans programming." | 167 187 |
| 05-10-2018 | 9:00 a.m. | Calendar Entry | Calendar entry from Dean Flynn's cell phone: "9:00am – Dr. Jon Sherin – DMH." The date listed is "05/10/2018." | 193 810 |
| 05-10-2018 | 3:49 p.m. | Email | Email from Peter Manzo to DEFENDANT: "It was good speaking with you recently. Attached as promised are a summary of employee benefits and a draft form of offer letter we would send to Ms. Smith alongside the letter from PRPI." | 354 |

| <u>DATE</u> | <u>TIME</u> | <u>TYPE</u> | <u>DESCRIPTION</u> | <u>EXHIBITS</u> |
|-------------|-------------|--|--|--|
| 05-10-2018 | 4:05 p.m. | Email | Email from DEFENDANT to Sebastian Ridley-Thomas forwarding the 3:49 p.m. email from Peter Manzo regarding the Zaneta Smith offer letter. DEFENDANT says: "My piece is done. 🙌" | 354 |
| 05-10-2018 | 9:56 p.m. | Email | Email from DEFENDANT to Dean Flynn and BCC to Sebastian Ridley-Thomas. The subject line is "Today's meeting." DEFENDANT says: "Tried to catch you before you got away today. Need to debrief and clear up a few things with you confidentially." | 152 355* *BCC to Sebastian Ridley-Thomas |
| 05-11-2018 | 6:21 a.m. | Email | Email from Dean Flynn to DEFENDANT: "I'm sorry I missed you" and "you have my cell phone number (I know.)" | 356 |
| 05-11-2018 | 6:58 a.m. | Email <i>Count Eighteen Interstate Wire</i> | Email from DEFENDANT to Dean Flynn: "Try me over the weekend or when you come up for air. Want to talk master contract stuff and somehow use yesterday's 'discussion' to advance it. 😊" | 357 807 |
| 05-11-2018 | -- | Bank Wire <i>Count Nineteen Interstate Wire</i> | Bank wire transfer of \$100,000 from a California Bank & Trust account for the Mark Ridley-Thomas Committee for a Better L.A. into a Bank of America account for USC. | 607 608 807 |
| 05-12-2018 | 12:39 p.m. | Phone Call | Outgoing call from DEFENDANT (xxx-xxx-1405) to Dean Flynn (xxx-xxx-3873) lasting 23 seconds. | 781 804 |
| 05-12-2018 | 12:39 p.m. | Phone Call | Outgoing call from DEFENDANT (xxx-xxx-1405) to Dean Flynn (xxx-xxx-2959) lasting 8 minutes and 4 seconds. | 781 804 |
| 05-12-2018 | 1:14 p.m. | Phone Call | Outgoing call from DEFENDANT (xxx-xxx-1405) to Dean Flynn (xxx-xxx-2959) lasting 30 minutes and 19 seconds. | 781 804 |
| 05-12-2018 | -- | Email | Email from Dean Flynn to Lynn Tamayo. Dean Flynn states that she had a call with DEFENDANT on May 12, 2018. | 168 |

| <u>DATE</u> | <u>TIME</u> | <u>TYPE</u> | <u>DESCRIPTION</u> | <u>EXHIBITS</u> |
|-------------|-------------|--|--|--------------------------|
| 05-15-2018 | -- | Letter | <p>Letter from Dean Flynn to DEFENDANT. The letter states:</p> <p><i>Dear MRT,</i></p> <p><i>Thank you for your generous support for the USC Suzanne Dworak-Peck School of Social Work and for the vote of confidence in the school and in my leadership. As you have instructed, your gift will be deposited into the Dean's Discretionary Fund. This account provides support for the critical needs and special opportunities.</i></p> <p><i>We are so appreciative of your involvement over the years, in the work of the school and the greater university. Our progress would not be possible without key supporters like you who share in our vision.</i></p> <p><i>Warm regards,</i> <i>Marilyn L. Flynn, PhD</i> <i>Dean and 2U Chair</i></p> | 156 |
| 05-18-2018 | -- | Email | Email from Dean Flynn to Lynn Tamayo. Dean Flynn states that she had a call with DEFENDANT on May 18, 2018. | 168 |
| 05-24-2018 | -- | Bank Wire <i>Count Twenty Interstate Wire</i> | Bank wire transfer of \$100,000 from a Bank of America account for USC into a JPMorgan Chase Bank account for United Ways of California. | 419 431 611 807 |
| 05-24-2018 | 10:25 a.m. | Email | Email from Peter Manzo to Sebastian Ridley-Thomas: "I'm writing to follow up on the hiring of Zaneta Smith as your Associate Director. We just received and deposited the funds to hire her from USC." | 702 |
| 05-25-2018 | 8:59 p.m. | Phone Call | Outgoing call from DEFENDANT (xxx-xxx-1405) to Dean Flynn (xxx-xxx-3873) lasting 37 minutes and 2 seconds. | 781 804 |

| <u>DATE</u> | <u>TIME</u> | <u>TYPE</u> | <u>DESCRIPTION</u> | <u>EXHIBITS</u> |
|-------------|-------------|-------------|--|-----------------|
| 05-26-2018 | 11:06 a.m. | Phone Call | Outgoing call from Dean Knott (xxx-xxx-6057) to DEFENDANT (xxx-xxx-1405) lasting 38 seconds. | 781 804 |
| 05-26-2018 | 11:36 a.m. | Phone Call | Outgoing call from DEFENDANT (xxx-xxx-1405) to Dean Knott (xxx-xxx-6057) lasting 44 minutes and 47 seconds. | 781 804 |
| 05-28-2018 | 5:03 p.m. | Phone Call | Outgoing call from Dean Flynn (xxx-xxx-3873) to DEFENDANT (xxx-xxx-1405) lasting 10 minutes and 0 seconds. | 781 804 |
| 06-01-2018 | 2:47 p.m. | Email | <p>Email from Dean Flynn to Lynn Tamayo. The attached document is titled “The Ten Most Important Accomplishments for the Suzanne Dworak Peck School of Social Work in 2017-18.”</p> <p>Under the heading “Faculty Development,” Dean Flynn says: “Recruitment of 2 distinguished senior scholars (Clapp, AAHB laureate; Yang); reduced number of part-time and adjunct faculty.” There is no mention of Sebastian Ridley-Thomas.</p> <p>Under the heading “Goals and Anticipated Accomplishments for 2018-19 Academic Year,” Dean Flynn states: “Expand TeleHealth Clinic services” and “Complete planning and begin implementation of new employee and graduate student training programs in youth justice with LA Department of Probation.”</p> <p>Under the heading “Valued Assistance from the Office of the Provost,” Dean Flynn states: “Obtaining a Master Contract or Affiliation Agreement for the University from the Los Angeles Department of Mental Health.”</p> <p>Dean Flynn also states: “we are reducing scholarship benefits in order to avoid the possibility of a deficit.”</p> <p>Finally, Dean Flynn states: “Qualify as legal entity with LA Department of Mental Health; develop Master Contract (affiliation agreement) with LA Department of Mental Health.”</p> | 159 |

| <u>DATE</u> | <u>TIME</u> | <u>TYPE</u> | <u>DESCRIPTION</u> | <u>EXHIBITS</u> |
|-------------|-------------|-----------------|--|-----------------|
| 06-04-2018 | -- | Letter | Letter from USC Senior Vice President Albert Checcio to DEFENDANT. The letter states: "Thank you for your gift of \$100,000 to the USC Dworak-Peck School of Social Work. With the incredible generosity of donors like you, USC remains among the nation's leading educational and research institutions. We are truly grateful for your support." | 174 |
| 06-06-2018 | 8:18 a.m. | Email | Dean Flynn asks DEFENDANT to get in touch with her. She says, "There is a major change I would like to tell you about." | 161 358 |
| 06-06-2018 | 8:39 a.m. | Phone Call | Outgoing call from DEFENDANT (xxx-xxx-1405) to Dean Flynn (xxx-xxx-3873) lasting 4 seconds. | 781 804 |
| 06-06-2018 | 8:40 a.m. | Phone Call | Outgoing call from Dean Flynn (xxx-xxx-3873) to DEFENDANT (xxx-xxx-1405) lasting 23 minutes and 46 seconds. | 781 804 |
| 06-06-2018 | 7:41 p.m. | Phone Call | Outgoing call from DEFENDANT (xxx-xxx-1405) to Dean Flynn (xxx-xxx-3873) lasting 7 minutes and 50 seconds. | 781 804 |
| 06-10-2018 | 8:19 p.m. | Phone Call | Outgoing call from DEFENDANT (xxx-xxx-1405) to Dean Knott (xxx-xxx-6057) lasting 54 seconds. | 781 804 |
| 06-10-2018 | 9:16 p.m. | Phone Call | Outgoing call from Dean Knott (xxx-xxx-6057) to DEFENDANT (xxx-xxx-1405) lasting 11 minutes and 47 seconds. | 781 804 |
| 06-11-2018 | -- | Lobbying Report | Dean Flynn's Second Quarter 2018 lobbying report lists a June 11, 2018 dinner with Bobby Cagle. | 186 |
| 06-12-2018 | 5:03 p.m. | Email | DEFENDANT's deputy forwards him an email from Dean Flynn announcing her transition from Dean of the USC School of Social Work to a new position in the Office of the Provost. | 359 |
| 06-13-2018 | 8:03 a.m. | Phone Call | Outgoing call from DEFENDANT (xxx-xxx-1405) to Dean Flynn (xxx-xxx-3873) lasting 21 minutes and 36 seconds. | 781 804 |
| 06-20-2018 | 5:55 a.m. | Email | Email from Dean Flynn to John Clapp and CC to Dean Knott and Leslie Wind. Dean Flynn states: "Price is sharing equally with us the costs of Sebastian's tuition and salary, and I have been supervising part of his work. Mark Ridley Thomas and Sebastian understand this as a commitment until Sebastian graduates (he is currently enrolled part time). This is a very important commitment on the part of both schools." | 164 |

| <u>DATE</u> | <u>TIME</u> | <u>TYPE</u> | <u>DESCRIPTION</u> | <u>EXHIBITS</u> |
|-------------|-------------|---------------------------|--|-----------------|
| 06-22-2018 | 2:00 p.m. | Phone Call | Outgoing call from John Sherin (xxx-xx6-8391) to DEFENDANT (xxx-xxx-1405) lasting 4 seconds. | 781 804 |
| 06-22-2018 | 2:01 p.m. | Phone Call | Outgoing call from John Sherin (xxx-xx6-8391) to DEFENDANT (xxx-xxx-1405) lasting 3 seconds. | 781 804 |
| 06-22-2018 | 2:15 p.m. | Phone Call | Outgoing call from DEFENDANT (xxx-xxx-1405) to John Sherin (xxx-xx6-8391) lasting 2 minutes and 54 seconds. | 781 804 |
| 06-23-2018 | -- | Email | Email from Dean Flynn to Lynn Tamayo. Dean Flynn states that she had a call with DEFENDANT on June 23, 2018. | 168 |
| 06-23-2018 | -- | Lobbying Report | Dean Flynn's Second Quarter 2018 lobbying report lists a communication with DEFENDANT on "6/23/18" to "influence official action." | 186 |
| 06-29-2018 | 12:31 p.m. | Phone Call | Outgoing call from DEFENDANT (xxx-xxx-1405) to Dean Flynn (xxx-xxx-8311) lasting 37 seconds. | 781 804 |
| 07-12-2018 | -- | Letter and Check | Letter from USC Associate Senior Vice President, University Comptroller, to the Mark Ridley-Thomas Committee for a Better L.A. Enclosed is a \$100,000 check from USC to the Mark Ridley-Thomas Committee for a Better L.A. The letter states: "Enclosed please find a check for \$100,000 payable to Mark Ridley-Thomas Committee for a Better LA. Based on recently discovered facts, USC respectfully remits the \$100,00 donation made by the Mark Ridley-Thomas Committee for Better LA on May 2, 2018." | 166 |
| 07-13-2018 | 3:01 p.m. | Email and Lobbying Report | Email from Lynn Tamayo with Dean Flynn's Second Quarter 2018 draft lobbying report. Dean Flynn lists an April 26, 2018 meeting with DEFENDANT "to learn in general how the county worked with universities and other organizations in meeting county needs for new programs, evaluation, and other services." Dean Flynn states, "I also met with him to discuss a gift agreement." | 167 187 |

| <u>DATE</u> | <u>TIME</u> | <u>TYPE</u> | <u>DESCRIPTION</u> | <u>EXHIBITS</u> |
|-------------|-------------|-----------------|--|-----------------|
| | | | Dean Flynn lists a May 10, 2018 meeting with John Sherin “to understand the process of establishing an affiliation agreement for schools at USC and to get an update on the timing of renegotiation for our TeleHealth contract.” | |
| 07-14-2018 | 5:38 p.m. | Phone Call | Outgoing call from DEFENDANT (xxx-xxx-1405) outgoing call to Dean Flynn (xxx-xxx-2959) lasting 23 seconds. | 781 804 |
| 07-14-2018 | 5:39 p.m. | Phone Call | Outgoing call from DEFENDANT (xxx-xxx-1405) outgoing call to Dean Flynn (xxx-xxx-3873) lasting 24 seconds. | 781 804 |
| 07-16-2018 | 4:09 p.m. | Phone Call | Outgoing call from DEFENDANT (xxx-xxx-1405) outgoing call to Dean Flynn (xxx-xxx-3873) lasting 3 seconds. | 781 804 |
| 07-16-2018 | 4:10 p.m. | Phone Call | Outgoing call from DEFENDANT (xxx-xxx-1405) outgoing call to Dean Flynn (xxx-xxx-2959) lasting 7 seconds. | 781 804 |
| 07-17-2018 | -- | Meeting | USC representatives meet with the United States Attorney’s Office and FBI. | Agent Testimony |
| 07-17-2018 | 3:50 p.m. | Email | Email from Dean Flynn to Lynn Tamayo. The subject line is “Re: Additions to lobbying report.” Tamayo asks, “Should purposes be noted for the telephone conversations with Mark Ridley Thomas?” Dean Flynn states: “No, Lynn. Just send it in.” | 168 |
| 07-17-2018 | -- | Lobbying Report | Dean Flynn’s Second Quarter 2018 lobbying report lists contacts with DEFENDANT but does not state the purpose or substance of the communications. The purpose of the May 10, 2018 contact with John Sherin is also not listed. | 186 |
| 07-18-2018 | 12:14 p.m. | Email | Email from “USC Provost” to Sebastian Ridley-Thomas and CC to John Clapp, Dean Knott, Michael Blanton, and Daniel Shapiro. The attached letter states that Sebastian Ridley-Thomas’s “faculty appointment” is “terminated.” | 169 |
| 07-18-2018 | 12:39 p.m. | Phone Call | Outgoing call from DEFENDANT (xxx-xxx-1405) to Dean Knott (xxx-xxx-6057) lasting 25 seconds. | 781 804 |
| 07-18-2018 | 12:53 p.m. | Email | Email from Monica Ann Ellis to Sebastian Ridley-Thomas stating that his “scholarship will not be continued.” | 361 |
| 07-18-2018 | 12:57 p.m. | Phone Call | Outgoing call from DEFENDANT (xxx-xxx-1405) to Dean Knott (xxx-xxx-6057) lasting 8 minutes and 57 seconds. | 781 804 |

| <u>DATE</u> | <u>TIME</u> | <u>TYPE</u> | <u>DESCRIPTION</u> | <u>EXHIBITS</u> |
|-------------|-------------|------------------|---|-----------------|
| 07-18-2018 | 1:08 p.m. | Phone Call | Outgoing call from DEFENDANT (xxx-xxx-1405) to Dean Knott (xxx-xxx-6057) lasting 9 minutes and 4 seconds. | 781 804 |
| 07-18-2018 | 1:17 p.m. | Phone Call | Outgoing call from DEFENDANT (xxx-xxx-1405) to Sebastian Ridley-Thomas (xxx-xxx-0342) lasting 13 minutes and 52 seconds. | 781 804 |
| 07-18-2018 | 1:20 p.m. | Email | Email from Sebastian Ridley-Thomas to DEFENDANT forwarding Monica Ann Ellis's 12:53 p.m. email stating that his "scholarship will not be continued." | 361 |
| 07-18-2018 | 1:21 p.m. | Email | Email from Sebastian Ridley-Thomas to DEFENDANT forwarding the USC Provost's email and letter regarding the termination of Sebastian Ridley-Thomas's faculty appointment. | 362 |
| 07-18-2018 | 3:26 p.m. | Email and Letter | Email from John Clapp to Peter Manzo and CC to Michael Blanton with a letter requesting return of the \$100,000 donation from USC to United Ways of California. | 170 |
| 07-19-2018 | 7:41 a.m. | Phone Call | Outgoing call from DEFENDANT (xxx-xxx-1405) to Paul Vandeventer (xxx-xxx-2016) lasting 2 minutes and 24 seconds. | |
| 07-19-2018 | 10:21 a.m. | Email | Email from Sebastian Ridley-Thomas to DEFENDANT forwarding an email from Peter Manzo regarding "USC requesting return of the \$100k grant to PRPI." | 363 |
| 07-19-2018 | 8:51 a.m. | Phone Call | Outgoing call from DEFENDANT (xxx-xxx-1405) to Peter Manzo (xxx-xx9-8522) lasting 1 minute and 3 seconds. | 781 804 |
| 07-19-2018 | -- | Voicemail | Voicemail from DEFENDANT to Peter Manzo: "Got a few insights I wish to share with you, uh, sooner rather than later." | 433 |
| 07-19-2018 | 10:34 a.m. | Phone Call | Outgoing call from DEFENDANT (xxx-xxx-1405) to Peter Manzo (xxx-xx9-8522) lasting 3 seconds. | 781 804 |
| 07-19-2018 | 10:35 a.m. | Phone Call | Outgoing call from Paul Vandeventer (xxx-xxx-2016) to DEFENDANT (xxx-xxx-1405) lasting 2 minutes and 59 seconds. | 781 804 |
| 07-19-2018 | 10:38 a.m. | Phone Call | Outgoing call from Paul Vandeventer (xxx-xxx-2016) to DEFENDANT (xxx-xxx-1405) lasting 21 seconds. | 781 804 |
| 07-19-2018 | 11:54 a.m. | Phone Call | Outgoing call from DEFENDANT (xxx-xxx-1405) to Peter Manzo (xxx-xx9-8522) lasting 5 seconds. | 781 804 |
| 07-19-2018 | 11:59 a.m. | Phone Call | Outgoing call from Peter Manzo (xxx-xx9-8522) outgoing call to DEFENDANT (xxx-xxx-1405) lasting 11 minutes and 45 seconds. | 781 804 |

| <u>DATE</u> | <u>TIME</u> | <u>TYPE</u> | <u>DESCRIPTION</u> | <u>EXHIBITS</u> |
|-------------|-------------|-------------|---|-----------------|
| 07-23-2018 | 2:44 p.m. | Phone Call | Outgoing call from DEFENDANT (xxx-xxx-1405) to Peter Manzo (xxx-xx9-8522) lasting 31 seconds. | 781 804 |
| 07-23-2018 | -- | Voicemail | Voicemail from DEFENDANT to Peter Manzo: "Peter, if you'd give me a call, I'd appreciate it." | 434 |
| 07-23-2018 | 2:47 p.m. | Phone Call | Outgoing call from DEFENDANT (xxx-xxx-1405) to Peter Manzo (xxx-xx9-8522) lasting 5 seconds. | 781 804 |
| 07-23-2018 | 3:07 p.m. | Phone Call | Outgoing call from Peter Manzo (xxx-xx9-8522) to DEFENDANT (xxx-xxx-1405) lasting 3 minutes and 18 seconds. | 781 804 |
| 07-23-2018 | 5:52 p.m. | Phone Call | Outgoing call from DEFENDANT (xxx-xxx-1405) to Dean Flynn (xxx-xxx-2959) lasting 6 seconds. | 781 804 |
| 07-23-2018 | 5:52 p.m. | Phone Call | Outgoing call from DEFENDANT (xxx-xxx-1405) to Dean Flynn (xxx-xxx-3873) lasting 5 seconds. | 781 804 |
| 07-24-2018 | 6:35 a.m. | Phone Call | Outgoing call from DEFENDANT (xxx-xxx-1405) to Dean Knott (xxx-xxx-6057) lasting 37 seconds. | 781 804 |
| 07-24-2018 | 6:54 a.m. | Phone Call | Outgoing call from DEFENDANT (xxx-xxx-1405) to Dean Knott (xxx-xxx-6057) lasting 14 minutes and 11 seconds. | 781 804 |
| 07-24-2018 | 3:39 p.m. | Phone Call | Outgoing call from Peter Manzo (xxx-xx9-8522) to DEFENDANT (xxx-xxx-1405) lasting 11 seconds. | 781 804 |
| 07-24-2018 | 3:39 p.m. | Phone Call | Outgoing call from DEFENDANT (xxx-xxx-1405) to Peter Manzo (xxx-xx9-8522) lasting 7 minutes and 57 seconds. | 781 804 |
| 07-25-2018 | 7:21 a.m. | Phone Call | Outgoing call from John Sherin (xxx-xx6-8391) to DEFENDANT (xxx-xxx-1405) lasting 13 minutes and 38 minutes. | 781 804 |
| 07-25-2018 | 9:06 a.m. | Email | Email from Sebastian Ridley-Thomas to DEFENDANT: "FYI...they used to assist with priority registration. My email has successfully been de-coupled from the faculty server." | 364 |
| 07-25-2018 | 2:58 p.m. | Phone Call | Outgoing call from Dean Knott (xxx-xxx-6057) to DEFENDANT (xxx-xxx-1405) lasting 17 minutes and 46 seconds. | 781 804 |
| 07-31-2018 | 6:05 a.m. | Phone Call | Outgoing call from DEFENDANT (xxx-xxx-1405) to Dean Knott (xxx-xxx-6057) lasting 0 seconds. | 781 804 |

| <u>DATE</u> | <u>TIME</u> | <u>TYPE</u> | <u>DESCRIPTION</u> | <u>EXHIBITS</u> |
|-------------------|-------------|-------------|--|-----------------|
| 07-31-2018 | 6:06 a.m. | Phone Call | Outgoing call from DEFENDANT (xxx-xxx-1405) to Dean Knott (xxx-xxx-6057) lasting 0 seconds. | 781 804 |
| 07-31-2018 | 9:02 a.m. | Phone Call | Outgoing call from Dean Knott (xxx-xxx-6057) to DEFENDANT (xxx-xxx-1405) lasting 15 minutes and 55 seconds. | 781 804 |
| 07-31-2018 | -- | Vote | DEFENDANT votes "aye" (yes) on Item No. 27 on the Board of Supervisors' July 31, 2018 agenda. Item No. 27 authorizes the Director of the Los Angeles County Department of Mental Health ("LADMH" or "DMH") to "execute an amendment to a sole source agreement with the University of Southern California (USC) on behalf of its USC Telehealth for the provision of tele-mental health services, to extend the term for one year, effective September 1, 2018 through August 31, 2019; and execute amendments to the agreement to sustain the program throughout the term, provided that sufficient funds are available..." Item No. 27 passed. | 576 577A |

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EXHIBIT B

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UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
WESTERN DIVISION

THE HONORABLE DALE S. FISCHER, JUDGE PRESIDING

UNITED STATES OF AMERICA,)
)
 Plaintiff,)
)
 vs.) NO. CR 21-485-DSF
)
 MARK RIDLEY-THOMAS,)
)
 Defendant.)
 _____)

REPORTER'S TRANSCRIPT OF PROCEEDINGS

Los Angeles, California

Wednesday, March 8, 2023, 7:44 A.M.

Day 2 of Jury Trial, Page 272 to 410, Inclusive

PAT CUNEO CSR 1600
Official Reporter
First Street Courthouse
350 West 1st Street
Room 4311
Los Angeles, CA 90012
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1 asked to believe is the story of Mark Ridley-Thomas selling
2 his vote.

3 That did not happen. Mark Ridley-Thomas did not
4 sell his vote because what you heard was only part of the
5 story told by someone who only knows part of the story.

6 My name is Galia Amram. I'm very proud to
7 represent Mark Ridley-Thomas along with my partners,
8 Daralyn Durie and Arturo Gonzalez, and our associates,
9 Ramsey Fisher and Jessica Lanier who's sitting right over
10 there.

11 The first thing I want to let you know is that you
12 will learn in this case that nothing that happened, nothing
13 that the government just told you was illegal if it was done
14 in good faith.

15 So that funneling of a hundred thousand dollars
16 that they just told you about, that was legal under campaign
17 finance law in California and you're going to hear that.

18 Everything that USC offered Sebastian was legal if
19 done in good faith and everything that Mark Ridley-Thomas
20 did to support county items before the Board of Supervisors
21 was legal if done in good faith.

22 Supporting a telehealth contract for remote
23 therapy for people who otherwise can't access it, that's
24 legal when done in good faith.

25 Supporting enhanced training for probation

1 BY MR. RYBARCZYK:

2 Q. Did you know if Dean Flynn had a relationship with the
3 defendant?

4 A. I'm not sure what you mean by a "relationship."

5 Q. Well, did she have a professional relationship with the
6 defendant?

7 A. Yes.

8 Q. How do you know that?

9 A. Because I had been aware that during the time that I
10 was there on occasion she talked with him about projects
11 that the school was working on to communicate about our
12 progress and the services we were offering.

13 Q. In your role as director of the Initiative, do you
14 recall Dean Flynn ever asking you to hand-deliver a letter?

15 A. Yes, I do.

16 Q. How many times did she ask you to do that?

17 A. One time.

18 Q. Who was the letter addressed to?

19 A. Supervisor Mark Ridley-Thomas.

20 MR. RYBARCZYK: Your Honor, at this time the
21 government moves -- Your Honor, at this time the government
22 asks permission to publish Exhibit 15 which is already in
23 evidence?

24 THE COURT: Then you don't need to ask permission.

25 MR. RYBARCZYK: Sorry. It's not entered, Your

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UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
WESTERN DIVISION

THE HONORABLE DALE S. FISCHER, JUDGE PRESIDING

UNITED STATES OF AMERICA,)
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 MARK RIDLEY-THOMAS,)
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 Defendant.)
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REPORTER'S TRANSCRIPT OF PROCEEDINGS

Los Angeles, California
Wednesday, March 8, 2023, 12:14 P.M.

Day 2 of Jury Trial, Page 411 to 511, Inclusive

WIL WILCOX, CSR 9178
Official Reporter
First Street Courthouse
350 West 1st Street
Room 4311
Los Angeles, CA 90012
wil.wilcox@gmail.com

1 A. Yes, there was.

2 Q. When was that?

3 A. That was right around that same time, late May or early
4 June of '18.

5 Q. And after the no-confidence vote is when she stepped
6 down in June of 2018?

7 A. Yes.

8 Q. Dr. Clapp, let me ask you, as a dean, do you get
9 additional compensation on top of your faculty tenured
10 salary?

11 A. Yes. That's the way it worked then, and I believe it
12 still works that way.

13 MS. DOTSON: Publishing Exhibit 191.

14 If we could zoom in on the top and the first two
15 paragraphs.

16 Q. Now, Dr. Clapp, have you ever served as the interim
17 dean of the USC School of Social Work?

18 A. Yes, I have.

19 Q. When was that?

20 A. That was from shortly after when former Dean Flynn
21 stepped down, I was appointed by Provost Quick, so that
22 started in late June, I believe, of 2018 and then ran
23 through that academic year into the next summer.

24 Q. When you became interim dean or based on running the
25 School of Social Work, are you aware of whether there's

1 additional compensation that someone gets as being the dean
2 of a school at USC?

3 A. Yes. The way it works is, you get a nine-month
4 academic salary, and then you get an administrative stipend
5 from the university.

6 Q. And do you see what's in front of you?

7 A. Yes.

8 Q. Okay. Have you ever seen this before?

9 A. No.

10 Q. What does it appear to be to you?

11 A. This looks like an offer letter from the provost to
12 Marilyn Flynn from 2017.

13 Q. Do you get an offer letter every year; is it kind of a
14 renewed thing?

15 A. Yes. If you're an administrator, you do.

16 Q. Do you see the first part of the second paragraph,
17 "Your salary for 2017, '18 will be 408,000"?

18 A. Yes, I do.

19 Q. What part of the salary package is the 408? Is that
20 related to the deanship or no?

21 A. Well, if you look at the next sentence, that 408 is the
22 complete package, probably minus bonuses. And then the
23 academic salary was the 273. And the administrative stipend
24 for being the dean was 135,000.

25 Q. So on top of that academic core of \$273,000, plus the

1 administrative stipend of \$135,000 for being the dean of a
2 school, are there additional bonuses that a dean can get
3 just by being employed at USC?

4 A. Yes. So depending on performance, they can receive
5 bonuses. And I think below here, it actually says the
6 bonus was set that year at between zero and \$35,000
7 additional.

8 MS. DOTSON: Let's publish the third paragraph of
9 the same letter.

10 Q. Now, do you see, "With all of this as background, your
11 performance-based compensation for 2016, '17, is 33,000."

12 Have you seen this term "performance-based
13 compensation" before?

14 A. I'm not sure if I've seen that exact term, but I know
15 what it means in this context.

16 Q. What does it mean?

17 A. It's basically the bonus that was awarded for her
18 performance the prior academic year.

19 Q. And would that be on top of her faculty salary and the
20 additional six figures that she gets for being a dean?

21 A. Yes, it would.

22 Q. Dr. Clapp, you mentioned that you became the interim
23 dean. When you became the interim dean in June of 2008, was
24 part of your responsibility to assess the financial state of
25 the School of Social Work?

1 A. Yes, it was. The dean is the primary fiduciary
2 official for the unit.

3 Q. Are the School of Social Work finances separate and
4 apart from the broader university USC finances?

5 A. For the most part, yes.

6 Q. Is each school, the business school, the medical
7 school, the School of Social Work at USC, each responsible
8 for maintaining its own budget?

9 A. Yes.

10 Q. Is each school responsible for maintaining its own
11 financial good shape, if you will, or staying in financial
12 good shape?

13 A. Yes.

14 Q. What was the financial state of the School of Social
15 Work when you became the interim dean in the summer of 2018?

16 A. At the time, we were running a deficit of -- that we
17 knew of at the time of \$8 million.

18 Q. When you say you knew of at the time, did their come a
19 point in time when you knew of something different?

20 A. Yes. As the year progressed and we had accountants
21 come in, both from the university and external, we
22 learned that that actual deficit that year was closer to
23 21 million.

24 Q. Dr. Clapp, do you know what cash reserves are?

25 A. Yes, I do.

1 Q. What are cash reserves?

2 A. Cash reserves are basically, like, profits in a
3 business. So at the end of any academic year, if revenue
4 exceeds expenditures, that's a reserve. And you basically
5 put it into an account, like a bank account, that the school
6 owns.

7 Q. Given your role as the interim dean, are you aware of
8 whether or not cash reserves had been used to cover expenses
9 for the School of Social Work when Marilyn Flynn was the
10 dean there?

11 A. Yes.

12 Q. And had cash reserves been used to cover the financials
13 and the expenses of the school?

14 A. Yes.

15 Q. Now, given this time when you said that there was an
16 8 million or soon learned after a \$21 million deficit, prior
17 to that, do you recall Marilyn Flynn ever making a comment
18 about a shortfall?

19 A. Yes. She had started to talk about the \$8 million
20 shortfall.

21 Q. Okay. Did she talk to you about any steps she was
22 taking to address the \$8 million shortfall?

23 A. Yes, she did.

24 Q. What did she say?

25 A. Her plan was to basically try to grow our way out of it

1 through various new programs.

2 Q. Did she talk about securing county contracts as a way
3 to grow?

4 A. Yes, she did.

5 Q. How would a county contract -- for instance, with the
6 County of Los Angeles -- potentially help the School of
7 Social Work at this time when there's an 8 million or
8 \$21 million budget deficit?

9 A. It would depend on the contract. But in general,
10 contracts, as a source of revenue, offset existing personnel
11 costs, existing overhead costs, and so on.

12 Q. Based on your experience with Dean Flynn and things
13 she's said to you or anything she's done in your presence,
14 did you get the sense of whether her legacy at the School of
15 Social Work appeared important to her?

16 MR. GONZALEZ: Objection. Calls for speculation.

17 THE COURT: Sustained.

18 BY MS. DOTSON:

19 Q. Did Dean Flynn ever make any comments to you about her
20 legacy?

21 A. Yes, she did.

22 Q. What did she say?

23 A. She was very proud of what she had done up to that
24 point and very concerned about how she was viewed in the
25 general social work field nationally.

1 Q. Is it possible to be removed as a dean at USC?

2 MR. GONZALEZ: I'm sorry -- I'll withdraw.

3 THE COURT: All right. You can answer.

4 THE WITNESS: Can you repeat the question?

5 BY MS. DOTSON:

6 Q. Is it possible to be removed as a dean at USC?

7 A. Yes, it is.

8 Q. How?

9 A. It's -- you serve at the provost and the president's
10 will.

11 Q. Based on your experience at USC and serving as an
12 interim dean, would a school's financial state be one reason
13 that a dean can be removed as a dean at USC?

14 MR. GONZALEZ: Your Honor, that calls for
15 speculation.

16 THE COURT: If you know.

17 THE WITNESS: If I know, I answer?

18 THE COURT: If you know the answer, yes.

19 THE WITNESS: Yes, it could be one factor.

20 BY MS. DOTSON:

21 Q. Dr. Clapp, have you ever heard of someone named
22 Mark Ridley-Thomas?

23 A. Yes, I have.

24 Q. How are you familiar with him?

25 A. Just mainly through the school, and then various news

1 amended contract?

2 A. I don't know if it would be federal funds.

3 Q. Would it be more taxpayer dollars?

4 A. Yes.

5 Q. And under the telehealth contract, was it the County of
6 Los Angeles that was providing money to the USC School of
7 Social Work?

8 A. Yes.

9 Q. Let's go down to the second to last paragraph. Do you
10 see, "As I understand it, DMH has plenty of clean (unused
11 for other purposes) match available (\$60 million or so) for
12 federal IV-E funds from its designated share of
13 realignment"?

14 A. Yes.

15 Q. Again, federal IV-E funds, that's the Title IV-E funds
16 we talked about earlier?

17 A. Yes.

18 Q. Did Marilyn Flynn talk to you about the potential for
19 getting more federal IV-E funds administered through the
20 County of Los Angeles pursuant to an amended telehealth
21 contract?

22 A. Yes.

23 Q. How much did she tell you she thought an amended
24 telehealth contract would be worth?

25 A. I believe she told me it would be worth about

1 \$8 million a year once we got it up and going.

2 Q. Do you see where it says at the top of the third
3 paragraph, "These two actions" -- referring to the two
4 bullets -- "are now essential to solidify the functionality
5 of Telehealth and meet an acute service need"; do you see
6 that?

7 A. Yes, I do.

8 Q. You then see, "A contract amendment might be the
9 quickest way to make this -- make this change, together with
10 your encouragement for a quick course of action would be
11 useful"?

12 A. Yes, I do.

13 Q. Again, who is this letter addressed to?

14 A. Mark Ridley-Thomas.

15 Q. Okay. Let's go back to the first page again, that
16 email.

17 What was the date of this email?

18 A. This was July 23rd, 2017.

19 MS. DOTSON: Okay. I'd like to talk with you now
20 about an agenda item.

21 Let's publish Exhibit 570.

22 Q. Sir, prior to meeting with the government, had you ever
23 seen this particular agenda item?

24 A. I had not.

25 Q. Which supervisor sponsored this motion?

1 A. Mark Ridley-Thomas and I -- I apologize if I get the
2 name wrong, Sheila Kuehl.

3 Q. Sheila Kuehl?

4 A. Correct.

5 Q. Okay. And what's the date of this agenda item?

6 A. This would be August 1st, 2017.

7 Q. Let's go to Page 4 of 5, paragraph 1.

8 Do you see that the agenda item here directs the
9 chief probation officer and others to report back to the
10 Board of Supervisors regarding some items?

11 A. Yes, it -- yes.

12 Q. Let's go to Page 4 of 5, paragraph 1C.

13 Do you see where it says, "Recommendations on a
14 Memorandum of Understanding to establish a partnership with
15 the University of Southern California's School of Social
16 Work to enhance services, particularly around health,
17 homelessness and case management"?

18 A. Yes.

19 Q. What do you understand a Memorandum of Understanding to
20 be?

21 A. A Memorandum of Understanding is typically either the
22 precursor to a contract, or it is an agreement in spirit
23 that you would have some sort of relationship between two
24 organizations.

25 Q. How, if at all, would a partnership with the County and

1 the USC School of Social Work at this time have benefited
2 the USC School of Social Work?

3 A. Depending on the types of services that it might yield,
4 it could have brought in revenue to the school.

5 Q. Based on your experience, was it common to see a
6 university, and particularly a school, mentioned in an
7 agenda item like this?

8 A. I hadn't seen it before, no.

9 Q. Do you know whether item number 16 passed?

10 A. I believe it did.

11 MS. DOTSON: I'd like to talk with you now about
12 another agenda item.

13 Let's publish Exhibit 573.

14 Q. Now, sir, prior to meeting with the government, had you
15 ever seen this agenda item before?

16 A. I had not.

17 Q. Let's go to the top. Do you see the two supervisors'
18 names?

19 A. Yes, I do.

20 Q. Who were those two supervisors?

21 MR. GONZALEZ: I'm going to object on the basis
22 that there's no foundation that this witness knows anything
23 about this document.

24 THE COURT: Well, I'll hear the question, and then
25 I'll decide.

1 regular program, so at least three years. It could be
2 longer, depending on what the curriculum was.

3 Q. So at least three years for a joint master's degree,
4 but it was difficult because the program hadn't developed
5 yet; am I understanding that correct?

6 A. That's right. I couldn't tell you with exactness how
7 long it would take without having the program in front of
8 me.

9 Q. So three years. How many semesters at USC are there in
10 one year?

11 A. Well, the two traditional semesters are fall and
12 spring. But in the online programs in several of the
13 graduate schools, there's a summer semester as well.

14 Q. So if it's \$13,000 a semester and there are three
15 semesters in a year and at least three years to complete
16 this degree, I'll ask you to do a little math, can you
17 estimate how much that might be for a full scholarship
18 award?

19 A. So -- and, again, this would -- this would be an
20 estimate. So you'd be looking at -- it would -- it would be
21 at least \$110,000 a year, possibly higher, depending on the
22 unit configuration. I'm not -- sorry, I misspoke. Not per
23 year, per program.

24 Q. So when you say "per program," is that because
25 Sebastian Ridley-Thomas was also getting admitted with a

1 scholarship award to attend the Price School of Public
2 Policy?

3 A. Yeah -- yeah -- well, a dual degree, yes. He would
4 have had to been admitted to both.

5 Q. So could there have been potentially even more
6 scholarship money on the Price side for the Public Policy
7 part of that degree potentially?

8 A. In theory, yes.

9 MS. DOTSON: Let's publish Exhibit 90, which I
10 understand there's no objection from the defense.

11 Q. Dr. Clapp, prior to meeting with the government, had
12 you ever seen this before?

13 A. I had not.

14 Q. What do you understand Exhibit 90 to be?

15 A. This is a letter from a former dean, Jack Knott, of the
16 Price School to Sebastian Ridley-Thomas, offering a
17 teaching -- or a nontenured track faculty position.

18 Q. Let's go a few pages in. Is it just from Dean Knott,
19 or is it also from Dean Flynn as well? And if you --
20 actually, we can stay here on the screen with this page. If
21 you want to look at the binder, it's Volume I.

22 A. Okay.

23 *(Counsel conferred.)*

24 THE COURT: You may proceed.

25 MS. DOTSON: Publish Page 3 of Exhibit 90. Let's

1 Telehealth Clinic.

2 Q. Now, is this email regarding Telehealth that you and I
3 have been talking about?

4 A. Yes, it is.

5 Q. Is this regarding the Telehealth Clinic that's been
6 losing a million dollars a year?

7 A. Yes, it is.

8 Q. Let's go to that second paragraph. Do you see where
9 she writes, "It's the financial barriers that prevent us
10 (Telehealth Clinic) from offering these services now. We're
11 on 'operation survival,' attempting to make USC Telehealth
12 self-sustaining in one year with a focus on maximizing our
13 contract reimbursed services"; do you see that?

14 A. Yes, I do.

15 Q. How would maximizing the contract reimbursed services
16 help sustain Telehealth?

17 A. Well, in theory, the more clients you could see, the
18 more revenue you'd bring in. And there's an economy of
19 scale with a bigger operation. So we'd realize greater,
20 kind of, surplus.

21 Q. Then she writes, "We're on 'operation survival'
22 attempting to make USC Telehealth self-sustaining in one
23 year..."

24 Is that what you discussed earlier about
25 Telehealth basically had one year to make it or break it?

1 Q. Is there a scope of work attached to this email? If we
2 can go up and look at the attachment. Just go up to the top
3 of the email chain.

4 Is there a scope of work attached that you see?

5 A. On the screen in front of me?

6 Q. What does "SOW" stand for, as far as you're aware? On
7 the attachment.

8 A. Scope of work.

9 Q. What is the scope of work?

10 A. Scope of work is basically what you would be providing
11 in a contract.

12 Q. Let's go down to that third paragraph again. Let's
13 start with bullet one. "The current contract allows us to
14 bill for children and youth ages 12 to 22. In our
15 amendment, we eliminated the age limit of 22. There is now
16 no age limit..."

17 Do you see that?

18 A. Yes, I do.

19 Q. What is the significance of that vis-à-vis the contract
20 amendment vis-à-vis the age limit?

21 A. It would greatly increase the potential population that
22 we could serve.

23 Q. If the USC Telehealth Clinic can serve more patients,
24 can that bring in more county dollars to the School of
25 Social Work?

1 A. Yes, in theory.

2 Q. Let's look at bullet four. "Reimbursed services can be
3 provided in a hybrid model, either on Telehealth platform or
4 on the ground, in schools, homes or other agencies. All of
5 our students in these placements can bill for intervention
6 services!"

7 Do you see that?

8 A. Yes, I do.

9 Q. Who do you understand would be billed in this case?

10 A. I believe it would be the County and perhaps Medi-Cal
11 directly. I'm not exactly sure how that billing flows.

12 Q. If there's more students who can bill the government,
13 is that more money, more revenue, for the School of Social
14 Work?

15 A. Yes. And also benefit to the students in terms of
16 placement reduction and tuition costs potential.

17 Q. Let's go to bullet five. "The reimbursement rate is
18 increased from \$89 to \$120 per 45-minute session."

19 Do you see that?

20 A. Yes, I do.

21 Q. What is the reimbursement rate, as far you understand
22 it?

23 A. I believe that's what we received for a billable hour
24 or a billable 45-minute session.

25 Q. So if the rate increases with this amended Telehealth

1 contract, what does that mean vis-à-vis revenue to the
2 School of Social Work?

3 A. Well, it potentially means that the surplus now is
4 going to be greater because the amount we can bill is
5 greater.

6 Q. Bill the County?

7 A. Yes, I believe so.

8 Q. Let's go look at that scope of work that's attached to
9 this email that Marleen Wong sent. If we could go to
10 Page 10 of 14. Page 10.

11 Okay. Do you recall that in her email, Marleen
12 Wong talked about highlighted provisions in the scope of
13 work that would be changes to the amended -- to the
14 Telehealth contract?

15 A. Yes.

16 Q. Do you see this highlighted provision under 10.1,
17 "Person's to be Served"?

18 A. Yes.

19 Q. You see "Contractor's LCSW and MSW Student Interns
20 (identified as Mental Health Practitioners hereafter) shall
21 provide services to children, TAY, and Adults ages 12 and
22 up."

23 Do you see that?

24 A. Yes.

25 Q. Let's start with that first part. What is contractors

1 A. Yes, it is.

2 Q. Would that have been -- with a Telehealth amendment,
3 would that have been an increased billable rate?

4 A. Yes, it would be.

5 Q. And who did you understand Marilyn Flynn would be
6 reaching out to at the County to try to get these amendments
7 to the existing Telehealth contract?

8 MR. GONZALEZ: Objection. No foundation at this
9 point. And calls for speculation.

10 THE COURT: Lay some foundation.

11 BY MS. DOTSON:

12 Q. Did Marilyn Flynn tell you who she was going to reach
13 out to at the County to try to get this amended Telehealth
14 contract?

15 A. Yes.

16 Q. Who?

17 A. Mark Ridley-Thomas and the director of Department of
18 Mental Health.

19 Q. Is that John Sherin?

20 A. Yes.

21 MS. DOTSON: At this time, let's publish
22 Exhibit 103, which I understand has been admitted at this
23 point.

24 Q. If you go down, what is Exhibit 103?

25 A. This is a email from Marleen to Marilyn and myself,

1 too."

2 Do you see that?

3 A. Yes, I do.

4 Q. At this point, in April of 2018, based on what Marilyn
5 Flynn told you, based on emails that were coming across your
6 inbox, did Marilyn Flynn appear very concerned about getting
7 this amended Telehealth agreement?

8 A. Yes, she did.

9 MR. GONZALEZ: Your Honor, that calls for
10 conclusion and for speculation.

11 THE COURT: If you -- if you have --

12 Why don't you rephrase your question.

13 BY MS. DOTSON:

14 Q. Sure.

15 At this time, in April of 2018, did Marilyn Flynn
16 express to you concern about getting the amended Telehealth
17 contract?

18 A. Yes. She mentioned it would be very important.

19 Q. In addition to mentioning that it would be very
20 important, did you see emails coming across your inbox with
21 Marilyn Flynn and others trying to get this amended
22 Telehealth contract?

23 A. Yes.

24 Q. Let's go up to the top email, 103. What is the top
25 email in this chain?

1 A. This email is from Marleen Wong to Marilyn Flynn and
2 myself, again on the 20th of -- I'm sorry -- on April 1st,
3 2018.

4 Q. Is this the response to Marilyn Flynn's email regarding
5 Telehealth that we just discussed?

6 A. Yes, it is.

7 Q. Marleen Wong writes to you and Marilyn Flynn,
8 "Telehealth survival is a priority."

9 Did you understand that Telehealth may not survive
10 without this amended Telehealth contract?

11 A. Yes.

12 Q. When Marleen Wong says, "I will continue to monitor the
13 progress of our amendment," what did you understand "the
14 amendment" to be?

15 A. That amendment that we just walked through.

16 Q. That would increase the billable rate for services
17 rendered to the County, and increase it so that there was no
18 age limit on the students or on the patients that students
19 at the School of Social Work could provide services for?

20 A. Yes.

21 Q. The amendment that would expand the scope of that
22 Telehealth contract?

23 A. Yes.

24 Q. When Marleen Wong writes, "Thank you for creating the
25 support and communication at the higher levels of DMH," were

1 you the one creating any support and communications at the
2 higher levels of DMH?

3 A. No.

4 Q. Who was?

5 A. Marilyn Flynn.

6 Q. And was John Sherin, as the director of DMH, part of
7 those higher levels of DMH, as you understood it?

8 A. Yes.

9 Q. Now, at this time, April 1st, 2018, how much money was
10 Telehealth losing a year?

11 A. \$1 million, approximately.

12 Q. How much did Marilyn Flynn tell you she thought this
13 amended Telehealth contract would mean to the USC School of
14 Social work?

15 A. The figure she kept mentioning was \$8 million.

16 Q. Dr. Clapp, as of the end of April 2018, or at the end
17 of April 2018, did Dean Flynn give you an update with any
18 good news about the Telehealth contract?

19 A. Yes, she did.

20 Q. At the end of April 2018, what did Dean Flynn tell you
21 about the amendment to the Telehealth contract?

22 MR. GONZALEZ: Your Honor, just preserving the
23 in limine motion.

24 THE COURT: All right.

25 MR. GONZALEZ: Thank you.

1 BY MS. DOTSON:

2 Q. At the end -- so let's go back.

3 These emails about Telehealth survival being a
4 priority and the Telehealth Clinic might not make it, this
5 is early April 2018; am I right about that?

6 A. Yes. It's April 1st.

7 Q. A few weeks later, did Marilyn Flynn give you any
8 update about the status of her negotiations regarding the
9 Telehealth contract?

10 A. Yes.

11 Q. What did Marilyn Flynn tell you just a few weeks after
12 this series of emails?

13 A. Something to the effect of, "Good news, we got the --
14 we're going to get the Telehealth contract."

15 Q. When she said, "Good news, we're going to get the
16 Telehealth contract," did she say anything else relating to
17 a favor?

18 A. Yes.

19 Q. What did she say to you at the end of April 2018?

20 A. She said something to the effect of, "But I had to do a
21 little favor to get it."

22 Q. Did she talk about having to do a favor for someone to
23 get it?

24 A. Yes.

25 Q. When Marilyn Flynn told you at the end of April 2018,

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UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
WESTERN DIVISION

THE HONORABLE DALE S. FISCHER, JUDGE PRESIDING

UNITED STATES OF AMERICA,)
)
 Plaintiff,)
)
 vs.) NO. CR 21-485-DSF
)
 MARK RIDLEY-THOMAS,)
)
 Defendant.)
 _____)

REPORTER'S TRANSCRIPT OF PROCEEDINGS

Los Angeles, California

Thursday, March 9, 2023, 7:44 A.M.

Day 3 of Jury Trial, Page 512 to 663, Inclusive

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1 I was first appointed to the municipal court,
2 which doesn't even exist anymore, in 1997 and I have learned
3 not to say that I've now seen it all because that was a
4 first.

5 (Laughter.)

6 THE COURT: Good morning, sir. You're still under
7 oath.

8 Ms. Dotson, you may continue.

9 Oh, first, as you know, you weren't supposed to
10 talk to anyone about the case or read or see anything about
11 it.

12 Is there anyone who by accident or otherwise came
13 across any information about the case that we need to hear
14 about?

15 (No response.)

16 THE COURT: I don't see any hands.

17 You may proceed.

18 MS. DOTSON: Thank you, Your Honor.

19 **GOVERNMENT'S CASE-IN-CHIEF RESUMED**

20 **DIRECT EXAMINATION RESUMED**

21 BY MS. DOTSON:

22 Q. Dr. Clapp, following up on where we left off yesterday,
23 was it in early April that Marilyn Flynn was emailing you
24 and Marlene Wong regarding the needs of the telehealth
25 clinic and that amended contract?

1 A. Yes.

2 Q. How much did Marilyn Flynn tell you she thought that
3 that amendment would be worth to the School of Social Work
4 for the telehealth contract?

5 A. She said she believed it would be worth about
6 \$8 million a year.

7 Q. As of April 2018, had the School of Social Work
8 obtained that amended telehealth contract that Marilyn Flynn
9 was seeking?

10 A. I don't believe so, no.

11 Q. All right. In April of 2018, who did Marilyn Flynn say
12 that she was planning to reach out to in order to get that
13 amended telehealth contract?

14 A. I believe she said she was reaching out to John Sherin
15 and Mark Ridley-Thomas.

16 Q. And when was it, again, that Marilyn Flynn then made
17 the statement you testified about yesterday, "Good news.
18 We're going to get the telehealth contract but I had to do a
19 favor for someone to get it"?

20 A. I believe that was shortly after. I don't know the
21 exact date.

22 Q. Does THE end of April sound about right to you?

23 A. That's about right.

24 MS. DOTSON: Publish Exhibit 107.

25 *(The exhibit was displayed on the screen.)*

1 BY MS. DOTSON:

2 Q. Okay. Dr. Clapp, prior to meeting with the government,
3 had you ever seen Exhibit 107 before?

4 A. I had not, no.

5 MS. DOTSON: Let's zoom in on the letter portion,
6 the whole portion, starting with the date.

7 *(The exhibit was displayed on the screen.)*

8 BY MS. DOTSON:

9 Q. What's the date of this letter?

10 A. This is May 2nd, 2018.

11 Q. And do you see where it says at the bottom "Enclosure
12 (\$100,000 check #116)"?

13 A. Yes, I do.

14 Q. Was there a check attached to this letter?

15 A. I can't see it so --

16 MS. DOTSON: Let's go to page 2. We're going to
17 publish page 2 of Exhibit 107.

18 *(The exhibit was displayed on the screen.)*

19 THE WITNESS: Yes, there's a check.

20 MS. DOTSON: If we could zoom in.

21 *(The exhibit was displayed on the screen.)*

22 BY MS. DOTSON:

23 Q. What's the date of this check?

24 A. This check was on May 2nd, 2018.

25 Q. Are you familiar with the Mark Ridley-Thomas Committee

1 suggests that the money's supposed to come in and go right
2 out the door to Sebastian Ridley-Thomas?

3 A. I do not.

4 Q. Did Marilyn Flynn ever tell you that this money was
5 supposed to be funneled through USC to the school -- from
6 the School of Social Work through USC and out to a nonprofit
7 controlled by the defendant's son?

8 MR. GONZALEZ: Your Honor, I object. It's
9 argumentative.

10 THE COURT: Overruled.

11 BY MS. DOTSON:

12 Q. I'll ask it again, Dr. Clapp. Did Marilyn Flynn ever
13 tell you that an incoming 100,000-dollar payment on
14 May 2nd, 2018, to the School of Social Work was supposed
15 to be funneled through the university and go out just days
16 later to a nonprofit controlled by the defendant's son?

17 A. She did not, no.

18 Q. If this hundred thousand-dollar payment from the
19 defendant's Ballot Committee had intended to be routed
20 through the School of Social Work and out to a nonprofit
21 controlled by the defendant's son, if that were true and if
22 you had learned about it at this time, what would you have
23 done?

24 A. I -- well, at first I would have asked Marilyn why we
25 were doing that and if it was legitimate and perhaps maybe

1 even gone to the Provost.

2 Q. Would it have raise red flags for you?

3 A. Yes.

4 Q. Why?

5 A. On the surface, the first time I heard of this, I
6 thought it didn't seem like it made any sense, for one. For
7 two, I thought it was possibly illegal so it just -- it
8 didn't make any sense to me.

9 Q. So May 2nd, 2018, is that correct on this letter?

10 A. Yes.

11 MS. DOTSON: Let's publish Exhibit 110.

12 *(The exhibit was displayed on the screen.)*

13 THE COURT: Ladies and gentlemen, you've probably
14 figured out by now that "publish" is lawyer speak for let's
15 show it to the jury.

16 BY MS. DOTSON:

17 Q. Dr. Clapp, is this the email we were talking about
18 yesterday that Michele Clark showed to you?

19 A. Yes, it is.

20 Q. Did she show you this email when she reported concerns
21 about this hundred thousand dollars going through the School
22 of Social Work?

23 A. Yes, she did.

24 Q. Had you seen this document before Michele Clark showed
25 it to you?

1 "urgent that we issue a sponsorship to the United Way of
2 California for \$100,000"?

3 A. Yes, I do.

4 Q. Did anything about that amount being a hundred thousand
5 dollars strike you as odd?

6 A. Yes. It matched the amount that came in a couple days
7 earlier.

8 Q. Was it the amount that came in just the day before on
9 May 2nd?

10 A. Yes. I believe so, yes.

11 Q. Was it the amount that came in just the day before on
12 May 2nd from the defendant's Ballot Committee?

13 A. Yes.

14 Q. What did you do upon learning that there had been this
15 email chain where the day before there had been this
16 100,000-dollar payment to the School of Social Work and the
17 very next day the defendant is directing Marilyn Flynn to
18 move that money out of the school?

19 A. I went back to my office and I believe it was the same
20 day I called the Provost and told him I needed to speak to
21 him about an important matter.

22 MS. DOTSON: Publish Exhibit 419. 419. Zoom in,
23 please.

24 *(The exhibit was displayed on the screen.)*

25

1 to the School of Social Work?

2 A. Yes, it does.

3 Q. When it says "Your gift will be deposited into the
4 Dean's Discretion Fund," do you see that?

5 A. Yes, I do.

6 Q. What is the Dean's Discretionary Fund?

7 A. That is a budgeted item that was in the budget at the
8 time where the Dean could basically use the funds to do
9 whatever she saw fit.

10 Q. By May 15th of 2018, when Marilyn Flynn's sending
11 this thank-you letter to the defendant, had that hundred
12 thousand dollars already moved out of the USC School of
13 Social Work?

14 A. Yes, I believe so.

15 Q. Based on what you know as the Interim Dean, is this
16 sentence accurate?

17 A. No.

18 Q. Dr. Clapp, you mentioned a no-confidence vote for
19 Dean Flynn prior to her resignation as Dean. Again, when
20 was that?

21 A. That was in -- I believe it was in late May or early
22 June when there was a straw poll vote that -- that our
23 faculty did; and then there was the actual vote. So it was
24 mid-June-ish, I believe.

25 Q. Does June 3rd ring a bell at all?

1 A. Yes.

2 Q. And what were the reasons, as you understood them as a
3 member of the faculty, for the no-confidence vote?

4 A. There were several reasons. The faculty was upset with
5 the direction and size of the school, that it had become --
6 at the time, it was the biggest school of social work in the
7 world and we were unable to adequately service that many
8 students in the faculty's opinion.

9 They were concerned about the spending, the way
10 Marilyn was spending money and the -- they were concerned
11 about the deficit.

12 Q. At that time in June 2018, on or around June 3rd, did
13 anything about the no-confidence vote appear to be related
14 at all yet to the Sebastian Ridley-Thomas matter?

15 A. No.

16 Q. Did Marilyn Flynn, at the time of the no-confidence
17 vote, appear to be in the loop or know that there was --
18 there had been any reports to the Provost about her conduct
19 related to the defendant?

20 MR. GONZALEZ: I'm sorry, Your Honor. That calls
21 for speculation.

22 THE COURT: Why don't you phrase it differently?

23 BY MS. DOTSON:

24 Q. Did Marilyn Flynn ever suggest to you around the time
25 of the no-confidence vote that she had any idea whatsoever

1 A. That's true, yes.

2 Q. When this no-confidence vote happened in or around --
3 you know, on or around June 3rd of 2018, did Marilyn Flynn
4 ever make any comments to you about the no-confidence vote?

5 A. I believe she made a comment shortly after she learned
6 about it but it -- I'm not exactly sure which date -- when
7 that occurred.

8 Q. Did she ever make a comment to you about "glad it
9 wasn't a scandal"?

10 MR. GONZALEZ: Objection. Leading.

11 THE COURT: Sustained.

12 BY MS. DOTSON:

13 Q. Did Marilyn Flynn ever make a comment to you about what
14 she had found out regarding the no-confidence vote?

15 A. Yes.

16 Q. What did she say to you?

17 A. She said that she was obviously upset about it and she
18 was concerned about her legacy. And then she did make a
19 comment, "I'm glad I'm not out on a scandal," and then made
20 a comment of -- that -- something to the effect of that she
21 should have left a year earlier.

22 Q. After Marilyn Flynn stepped down as the Dean in early
23 June 2018, did you take on any additional responsibilities
24 at the USC School of Social Work?

25 A. Yes. I was appointed as the Interim Dean.

1 Q. Does that mean you were taking over for Marilyn Flynn?

2 A. Yes.

3 Q. Did you start having transition meetings with her to
4 prepare to be the Interim Dean of the school?

5 A. Yes, there were a couple.

6 Q. What was the purpose of those meetings?

7 A. The purpose of those meetings were to kind of get me up
8 to speed on the -- the things I didn't necessarily know she
9 would -- had going or that I knew of but didn't have
10 operation details of.

11 Q. Did it appear whether Dean Flynn -- or Marilyn Flynn at
12 that time wanted you to continue on with some initiative she
13 had?

14 A. Yes.

15 Q. What made you think that?

16 A. She -- she said so. She listed a few things that she
17 thought were important for the school and asked me to
18 continue them.

19 Q. Did Marilyn Flynn ever make a comment to you about
20 Mark Ridley-Thomas or Sebastian Ridley-Thomas, MRT or SRT?

21 A. Yes, she did.

22 Q. What did Marilyn Flynn say to you regarding, quote, MRT
23 and SRT?

24 A. Well, first she reiterated the importance of the
25 telehealth expansion to the school. And then she said

1 something to the effect of: At some point soon, I'll have
2 to tell you about my deal with them.

3 Q. Did she say "side deal"?

4 MR. GONZALEZ: Objection. Leading.

5 THE COURT: Overruled.

6 THE WITNESS: I believe so, yes.

7 BY MS. DOTSON:

8 Q. After Marilyn Flynn told you about the importance of
9 the telehealth contract and the need to inform you about her
10 side deal with the defendant and his son,
11 Sebastian Ridley-Thomas, did she ever follow up and tell you
12 what that side deal was?

13 A. No.

14 Q. Was it soon thereafter that there was an internal
15 investigation at USC regarding Marilyn Flynn's conduct?

16 A. Yes. I believe it had already started during these
17 transition meetings.

18 Q. At any point, did Marilyn Flynn follow up with you and
19 make a comment about a hundred thousand-dollar payment from
20 the defendant?

21 A. Yes. In -- in one of those meetings, she kind of made
22 an offhand comment: Well, you have -- at least you'll have
23 a hundred thousand dollars to use however you need to use
24 it.

25 Q. Did that strike you as odd at that time in June of

1 that stipulated the endowment was contingent on that.

2 Q. When you say "endowment," does that mean a big donation
3 coming into a school?

4 A. Yes.

5 Q. So in your 30 years, you've seen only one other
6 instance and that was when there was a potential for a big
7 pot of money to come into a particular school?

8 A. Yes.

9 Q. Based on things Marilyn Flynn told you, what was your
10 understanding as to why it would be important to honor a
11 commitment to the defendant and his son?

12 A. It was my understanding that it was important to
13 maintain this for the -- the health of the telehealth
14 clinic.

15 MR. GONZALEZ: Your Honor, I move to strike that
16 as speculative.

17 MS. DOTSON: That's based on the -- I asked him
18 based on Marilyn Flynn's statements to him.

19 THE COURT: You can cross-examine.

20 BY MS. DOTSON:

21 Q. Dr. Clapp, after these issues came to light that you
22 mentioned earlier regarding Sebastian Ridley-Thomas's dual
23 faculty status, did Sebastian Ridley-Thomas continue on as a
24 professor?

25 A. No.

1 MS. DOTSON: Publish Exhibit 169, please. Zoom in
2 on the top portion of the email.

3 *(The exhibit was displayed on the screen.)*

4 BY MS. DOTSON:

5 Q. Have you seen Exhibit 169 before?

6 A. Yes, I have.

7 Q. What is it?

8 A. This is an email from the Provost's office to
9 Sebastian Ridley-Thomas, cc'ing myself, Jack Knott,
10 Michael Blanton, and Daniel Shapiro from the university and
11 the subject was a letter that was attached from Marty Levine
12 who's in the Provost's office.

13 Q. Is the Provost office that same office we talked about
14 yesterday that's the boss of all the deans in the schools at
15 USC?

16 A. Yes. There's several Vice Provosts.

17 Q. Who's Michael Scott Blanton?

18 A. He is -- at the time, I'm not sure what his term --
19 the -- his exact title was, but he is our kind of ethics and
20 professional standards attorney and -- not attorney, but
21 vice president.

22 Q. Who's Daniel Shapiro?

23 A. He works for -- for that same office and he does
24 investigations.

25 Q. What's the date of this email?

1 A. This is July 18, 2018.

2 Q. Was there an attachment to this email?

3 A. Yes.

4 MS. DOTSON: Go to page 2, please. If we could
5 zoom in on the letter starting with the date and going down
6 to the signature block.

7 *(The exhibit was displayed on the screen.)*

8 BY MS. DOTSON:

9 Q. Okay. What is this letter, Dr. Clapp?

10 A. This is a letter to Sebastian Ridley-Thomas from Marty
11 Levine that basically is saying that the faculty appointment
12 is in violation of the handbook and, therefore, it's --
13 needs to be terminated.

14 Q. Is that Section 3-J of the faculty handbook that we
15 talked about yesterday?

16 A. Yes.

17 Q. And so the faculty appointment for
18 Sebastian Ridley-Thomas, is it terminated as of July 18th,
19 2018, pursuant to this letter?

20 A. Yes.

21 Q. In addition to the rescinding of the professorship or
22 the termination of the professorship, when issues regarding
23 the hundred thousand dollars and everything with Sebastian
24 came to light, did he continue on with his full-tuition
25 scholarship at USC?

1 A. He did not.

2 Q. When was that stopped?

3 A. I believe the same day.

4 Q. July 18th, 2018?

5 A. Yes.

6 Q. Around this time, did anyone at USC ever ask United
7 Ways for return of that 100,000-dollar payment that went out
8 of USC to United Ways?

9 A. Yes. The letter came from the School of Social Work,
10 the Dean's office, requesting the return of that money.

11 MS. DOTSON: Publish Exhibit 170, please.

12 *(The exhibit was displayed on the screen.)*

13 BY MS. DOTSON:

14 Q. What is Exhibit 170?

15 A. This is an email from myself to Pete Manzo who was the
16 executive director or CEO of United Ways, and it is
17 basically telling him that I've sent this other letter via
18 Federal Express.

19 Q. Is there a letter attached to it?

20 A. I believe so, yes.

21 MS. DOTSON: Go to page 2, please.

22 *(The exhibit was displayed on the screen.)*

23 BY MS. DOTSON:

24 Q. What's the date of this letter asking for the return of
25 the hundred thousand dollars?

1 A. In July 17th, 2018.

2 Q. Is this a letter from you to Peter Manzo?

3 A. Yes, I sent this letter.

4 Q. Where it says "Based on recently discovered facts, USC
5 also believes that the donation was made in contravention of
6 USC policy and procedure," what were the recently discovered
7 facts as you understood them?

8 A. I believe that was the money in-money out, that we
9 don't make grants, and there probably was a few other things
10 involved as well that I can't remember at the time.

11 Q. When the next sentence says "We respectfully request
12 the remittance of the donation," is that the return the
13 donation?

14 A. Yes. We're asking for the money back.

15 Q. Did USC ever get the money back from United Ways?

16 A. Yes, I believe they did.

17 Q. Did USC thereafter return the hundred thousand-dollar
18 payment that the defendant had made to USC as well?

19 A. Yes, I believe they did.

20 Q. So just so I'm clear, when this came to light at USC,
21 did USC take steps to undo all of the money that had been
22 transmitted through USC?

23 A. Yes.

24 Q. I want to ask you, sir, without telling me anything
25 that was in it, do you recall an article on August 1st,

1 Q. Are each of those schools under the university umbrella
2 responsible for maintaining their own financial good state?

3 A. Yes.

4 Q. In 2017 and 2018, how big was the actual deficit for
5 the USC School of Social Work?

6 A. \$21 million, approximately.

7 Q. Was that estimated to continue to grow?

8 A. Yes. It -- it could grow theoretically. What had
9 happened is our expenditures had exceeded the revenue we
10 generated by enrollment. And we were at full capacity of
11 enrollment so it would have theoretically kept growing if we
12 didn't cut costs.

13 Q. Was this a serious financial crisis for the School of
14 Social Work?

15 A. Yes, it's -- we're still reeling from it.

16 Q. You're still reeling from it?

17 MS. DOTSON: If we could publish Exhibit 576,
18 please. Let's leave this up for a second.

19 *(The exhibit was displayed on the screen.)*

20 BY MS. DOTSON:

21 Q. Defense counsel talked to you about the telehealth
22 contract here; am I right?

23 A. Yes.

24 Q. Does this contract extend the telehealth program and
25 its contract with the county one more year?

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UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
WESTERN DIVISION

THE HONORABLE DALE S. FISCHER, JUDGE PRESIDING

UNITED STATES OF AMERICA,)
)
 Plaintiff,)
)
 vs.) NO. CR 21-485-DSF
)
 MARK RIDLEY-THOMAS,)
)
 Defendant.)
 _____)

REPORTER'S TRANSCRIPT OF PROCEEDINGS

Los Angeles, California

Thursday, March 9, 2023, 11:41 A.M.

Day 3 of Jury Trial, Page 664 to 795, Inclusive

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1 A. That's correct.

2 Q. At least, this "To:" and "From:" line; is that correct?

3 A. Yes.

4 Q. And the subject line appears to be "Sebastian
5 Ridley-Thomas"; is that right?

6 A. That's right.

7 Q. Now, before we jump into the content of this email, is
8 USC on a quarter or semester system?

9 A. We're on a semester basis.

10 Q. Okay. And does that mean that the school year usually
11 starts in the fall?

12 A. The school year usually starts about the third week in
13 August.

14 Q. All right. And when does the fall semester conclude?

15 A. Generally speaking, about mid-December.

16 Q. Okay. And so December 16th, 2017, based on your
17 experience at the School of Public Policy and USC, where
18 would we be at in terms of the semester?

19 A. You're at the very -- that would be at the very end of
20 the semester.

21 Q. All right. So would you expect classes to be in
22 session during this time period?

23 A. No. I would expect examinations to be -- final
24 examinations to be either under way or concluded.

25 Q. All right. So essentially, we're at the end of the

1 fall semester in mid-December of 2017; is that correct?

2 A. That's correct.

3 Q. Okay. Can you please --

4 What's the level of activity like at USC
5 mid-December in terms of the presence of staff, students,
6 et cetera?

7 A. Generally speaking, the level of activity, once
8 examinations are completed, is very low. Many times,
9 faculty and staff may be taking vacation time to augment
10 their time during the winter break.

11 Q. Did you say faculty and staff?

12 A. Sure.

13 Q. Okay. And what about the presence of students?

14 A. Students will -- in most cases, will have concluded
15 their examinations and will have left for home or a vacation
16 of some type.

17 Q. And was this email string, the general purpose or
18 subject, was this regarding the onboarding of Sebastian
19 Ridley-Thomas as a USC employee?

20 A. Yes, this appeared to be the hiring of Sebastian
21 Ridley-Thomas as an employee of USC.

22 MR. MORSE: All right. I want to go to the very
23 end of this email string, if we could. If we could zoom out
24 on the last page, Page 4, I believe. Sorry, second to last.
25 Let's go to Page 3.

1 Q. All right. Taking a look at Page 3, it appears to be
2 the first message in this email string; do you agree with
3 that?

4 A. Yes, that appears to be.

5 Q. Okay. And it's from Regina Nordahl to Michele Clark;
6 is that correct?

7 A. That's correct.

8 Q. And the date here, December 13th, 2017; is that right?

9 A. That's correct.

10 Q. By the way, Regina Nordahl and Michele Clark, they were
11 mentioned by Dean Flynn in Exhibit 48 when she was
12 discussing contacting Regina and Michele Clark; is that
13 right?

14 A. That's correct.

15 Q. Okay. So these are the two individuals it appears she
16 was referring to?

17 A. That's correct.

18 Q. Okay. And in this message from Regina Nordahl to
19 Michele Clark, she says, "Michele, Dean Knott asked me to
20 reach out to you regarding a 50 percent time position for
21 Sebastian Ridley-Thomas, which will be jointly shared by
22 both Price and Social Work."

23 Based on what's written there, what does that
24 refer to?

25 A. It appears that there is an effort to hire Sebastian

1 Ridley-Thomas into a position, a half-time position with the
2 University of Southern California.

3 Q. All right. And then it goes on to say, "I am traveling
4 to the East Coast starting tomorrow, returning on Thursday,
5 December 21st, 2019."

6 Do you see that?

7 A. Yes.

8 Q. And it says, "Given the holidays, with key employees on
9 vacation, it is going to be difficult to work on this until
10 January 2nd, 2018."

11 Do you see that?

12 A. Yes, I do.

13 Q. Okay. Is that consistent with what you know to be
14 common around this time of year at USC? In other words,
15 staff and faculty members traveling, being on vacation, and
16 things of that nature?

17 A. Yes.

18 Q. Would you say this is a bit of a difficult time to get
19 things done?

20 A. Yes.

21 Q. Would it be an unusual time to attempt to onboard a
22 faculty member during this time of the year?

23 A. Yes.

24 MR. MORSE: And if we could zoom out, please, and
25 get to the message from Michele Clark that starts with "Hi

1 would normally be August 16th. Why is that?

2 A. Just as a normal part of an academic calendar.

3 Q. All right. So the appointment would usually take place
4 at the beginning of the year, correct?

5 A. At the beginning of the academic year, yes, that's
6 correct.

7 Q. All right. As opposed to at the end or in the middle?

8 A. Correct.

9 Q. Now, when you were going through this hiring process
10 with Sebastian Ridley-Thomas and received this offer letter,
11 were you aware at the time that it was being contemplated
12 that Sebastian Ridley-Thomas would be a student at the
13 School of Social Work and at the School of Public Policy?

14 A. I was unaware of that.

15 Q. Okay. So, again, this offer letter is in March. At
16 this point, you didn't know that Sebastian Ridley-Thomas was
17 going to be a student in your school; is that fair?

18 A. That's correct.

19 Q. Okay. If you'd known that, that he was going to be a
20 student in either the School of Social Work or the School of
21 Public Policy, would that have concerned you?

22 A. Yes.

23 Q. Why?

24 A. Because we have an employee faculty handbook that
25 specifically precludes that participation in any of the

1 degrees offered within the university unless it is approved
2 by a provost waiver.

3 Q. What are the concerns around a student being both a
4 student and a professor in a given program?

5 A. Direct concerns relate to a potential conflict of
6 interest. So the individual would be in the degree program
7 as they are potentially teaching within that program as
8 well.

9 Q. And why would that be an issue?

10 A. Because it's difficult to be both student and faculty.
11 And certainly, the university is concerned about whether or
12 not there would be accommodations given to that individual
13 by his or her colleagues that are teaching in the classes
14 that he or she is going to be taking within the degree
15 program.

16 Obviously, the university would be very much
17 concerned. The school would be very much concerned about
18 the possibility of the student reaction to having an
19 individual that is both a instructor and a student.

20 Q. How long have you been in the field of academia, sir?

21 A. More than 35 years.

22 Q. And in your experience in the field of academia, both
23 as a professor and later as an administrator, have you
24 interacted with many of your colleagues, other professors,
25 and administrators?

1 A. Yes.

2 Q. In fact, did you have some role in the crafting of the
3 faculty handbook?

4 A. I was chair of the Faculty Handbook Committee for a
5 period of a couple of years.

6 Q. Okay. So you're pretty dialed in to the rules and
7 regulations; is that accurate?

8 A. Yes, unfortunately.

9 Q. Okay. But also, did you discuss and interact with your
10 other colleagues around this -- around issues relating to
11 the faculty handbook?

12 A. Yes.

13 Q. Okay. And other policies and sort of no-noes in the
14 world of academia; is that fair?

15 A. Yes.

16 Q. Was this commonly known at the time that it's a
17 conflict of interest and would be a problem for a student to
18 be both a professor and a student in a given program?

19 A. Yes.

20 Q. Now, at the time that you were handling Sebastian
21 Ridley-Thomas as both his hiring -- and it sounds like you
22 had some -- you had some role in his onboarding in terms of
23 the background check; is that correct?

24 A. Yes.

25 Q. And is the onboarding process more of the HR-type

1 of Public Policy.

2 Q. Well, let's go up to your response, your next message,
3 I should say. If we can scroll up on Page 1 of this
4 exhibit.

5 You send an email -- it looks like you're
6 forwarding Sebastian Ridley-Thomas's and your email to
7 Kattie Johnson here, correct?

8 A. That's correct.

9 Q. And you say or you ask, "... we don't have a joint
10 online, do we?"

11 Do you see that?

12 A. Yes.

13 Q. Why were you questioning that?

14 A. My specific responsibilities were faculty affairs, not
15 academic affairs. So I wasn't that involved in the degree
16 programs except in the programs that I taught. And so this
17 came out of left field to me. I was not aware of a joint
18 MPA/MSW degree at that time.

19 Q. Were you aware of an online program --

20 A. Yes.

21 Q. -- for the MPA program?

22 A. Yes.

23 Q. You seem to be expressing some -- you're questioning
24 whether that program even exists at the current moment; is
25 that correct?

1 A. That is correct.

2 Q. Was it not clear to you that such a program even
3 existed?

4 A. It was not clear to me that a program even existed.
5 And I didn't necessarily have the knowledge base -- the
6 knowledge about that.

7 Q. Did you later find out that, indeed, such a program did
8 not yet exist?

9 A. Yes, I found out it did not exist.

10 Q. Did that raise additional concerns for you?

11 A. Yes.

12 Q. Why is that?

13 A. Because apparently, Sebastian Ridley-Thomas had been
14 informed there was such a degree that could be available
15 even though we didn't have one.

16 Q. Now, in terms of just this overall hiring process, in
17 your time in academia as both a professor and as an
18 administrator, had you ever been involved in the hiring and
19 onboarding of a candidate where you were so kind of out of
20 the loop in terms of what their actual role at the
21 university would be?

22 A. I don't believe so.

23 Q. Had you ever been involved in the hiring or onboarding
24 of a candidate that was attempting to be expedited during
25 the winter break in this way?

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UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
WESTERN DIVISION

THE HONORABLE DALE S. FISCHER, JUDGE PRESIDING

UNITED STATES OF AMERICA,)
)
 Plaintiff,)
)
 vs.) NO. CR 21-485-DSF
)
 MARK RIDLEY-THOMAS,)
)
 Defendant.)
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REPORTER'S TRANSCRIPT OF PROCEEDINGS

Los Angeles, California

Friday, March 10, 2023, 7:46 A.M.

Day 4 of Jury Trial, Page 796 to 936, Inclusive

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1 Q. What are those disclosure obligations?

2 A. Umm, you need to -- I don't know all of them so I'll
3 just state that because I'm not a (c)(3) attorney. But it
4 is important for (c)(3) organizations to file tax forms that
5 are called 990s, and they also need to report any specific
6 lobbying that might happen within them.

7 Q. Have you heard Community Partners referred to as a
8 fiscal sponsor?

9 A. Yes.

10 Q. What is a fiscal sponsor?

11 A. A fiscal sponsor is a nonprofit organization that
12 essentially serves as an umbrella to other organizations or
13 entities that want to do work that will provide -- it --
14 that want to do work in which they can receive tax
15 deductible donations.

16 Let's just say you are a person who has an
17 interest in supporting young people in your neighborhood so
18 you set up in your own backyard, with your own funds, an
19 after-school program for young people who, you know, need
20 something to do in the off-school hours.

21 You've been doing this for a while. You're coming
22 out of pocket. A donor finds out that you're doing this,
23 wants to help you and says: I'm going to make a \$5,000
24 contribution to you because I see all this good work that
25 you're doing with kids, but I need it to be tax deductible.

1 I can't just give you the money.

2 What you might do, as the person who's running
3 that organization, is seek fiscal sponsorship.

4 Now, you could go ahead and establish yourself as
5 a nonprofit by getting the state designation and then going
6 through the more arduous process of getting the IRS to give
7 you 501(c)(3) designation so you can do that. Or you can
8 move a little more quickly and find a nonprofit to fiscally
9 sponsor you.

10 What that means is that the fiscal sponsor is
11 taking responsibility for what you are doing as a sponsored
12 entity within them. So a fiscal sponsor covers the
13 organizations within it, with it's I- -- they share the same
14 IRS designation, the same tax exemption.

15 In the case of Community Partners, we practice
16 what was called comprehensive fiscal sponsorship. So all of
17 the people and entities that came to us who wanted to do
18 good work, they were very focused on mission, but they
19 didn't want to deal with all of the filing and the
20 administration, the reporting. We handled that for them.
21 So we essentially absorbed them.

22 So I want to be clear that groups that were part
23 of Community Partners, it was like we were a super nonprofit
24 made up of all these different nonprofits coming together
25 and we shared the same tax ID status, we shared the same

1 governing board of directors, we shared the same insurance
2 policy. We shared the same bank account. So we were all
3 part of one.

4 If you were a project of Community Partners, your
5 paychecks came from Community Partners, your HR policies
6 were Community Partners. We all shared the same
7 designation.

8 Q. Ms. Berry, was there one distinct difference there?
9 Did the Community Partners do the fundraising for the
10 sponsor projects underneath their umbrella, if you will?

11 A. We did not. Some fiscal sponsors do, but we did not.

12 Q. And I think -- believe you just testified, Ms. Berry,
13 but correct me if I'm wrong, did you say that Community
14 Partners handled the payroll for the sponsored projects
15 underneath them?

16 A. That is correct.

17 Q. Did they also -- you said there's also a HR policy, you
18 said. Is that a human resources policy that applied to
19 sponsored projects underneath the umbrella of Community
20 Partners?

21 A. If they were part of our comprehensive fiscal
22 sponsorship program. I don't want to get too nerdy, but
23 there are multiple types of fiscal sponsorship.

24 What we mostly practiced was comprehensive, but
25 there is another type in which entities that have their own

1 a potential sponsored project?

2 A. Yes.

3 Q. And why is that?

4 A. The mission of Community Partners was to accelerate
5 ideas into action to support the public good. So we wanted
6 to make sure that the projects that we were bringing into
7 fiscal sponsorship were intended for broader community
8 impact.

9 Q. Did you want to make sure that Community Partners
10 didn't become a vehicle for so-called self-employment
11 projects?

12 A. That was something that we were trying to guard
13 against. That was not my own personal bias. That's just
14 the way the organization had operated.

15 Q. Now, earlier you had testified that the defendant had
16 some sponsored projects associated with Community Partners.

17 Do you remember that?

18 A. Yes.

19 Q. Okay. Was one of those sponsored projects called the
20 African American Civic Engagement Project?

21 A. Yes.

22 Q. And was that a comprehensive fiscal sponsorship?

23 A. Yes, it was part of our comprehensive fiscal
24 sponsorship program.

25 Q. And so for the jury, that means that you provided

1 A. The project was pretty low on funds.

2 Q. At that time, did Community Partners have the required
3 amount of money in its accounts so that it could hire an
4 employee?

5 A. No. We required six months of budget of the -- six
6 months' worth of -- of reserves in the project accounts in
7 order to hire an employee because we didn't want to bring
8 people on and then immediately have to lay them off.

9 Q. And by six months in the project reserves, is that with
10 respect to the salary of the employee?

11 A. I think the rule of thumb that we used was, yeah, six
12 months of salary for what that employee would cost, salary
13 and benefits.

14 Q. Okay. You say benefits; okay.

15 A. Yeah.

16 Q. And did those benefits include health benefits?

17 A. They did.

18 Q. Do you recall having conversations with Mr. Harris in
19 the fall of 2017 concerning ACEP's lack of funds?

20 A. I don't recall details, but I -- I do recall talking
21 with Mr. Harris about that.

22 Q. Now, in late 2017, did you learn that ACEP was going
23 to be receiving a donation?

24 A. Yes.

25 Q. And who was that donation going to be from?

1 A. -- yeah.

2 Q. By "Vincent," do you mean Mr. Harris?

3 A. Mr. Harris, Vincent Harris.

4 Q. And, again, who is Mr. Harris?

5 A. He is or was the project leader.

6 Q. When you received this donation, did you have any
7 concerns about it coming from the Mark Ridley-Thomas
8 Committee for a Better L.A.?

9 A. Yes.

10 Q. What were those concerns?

11 A. I wasn't sure if we were able legally to accept
12 campaign funds for the support of our projects.

13 Q. Did you also have any concerns with the optics of the
14 donation?

15 A. Yes, but not initially.

16 Q. Okay. And why do you say "not initially"?

17 A. At the point when these funds came in, there was
18 discussion of hiring someone to assist Mr. Harris with some
19 of the administrative needs of the project.

20 And my understanding was that these funds were to
21 support that person's salary. So that didn't cause me -- I
22 didn't have any concerns about that.

23 Q. But you're testifying -- your testimony is that later
24 you had optics concerns related to this donation?

25 A. Later, yeah.

1 MR. RYBARCZYK: Can you please publish
2 Exhibit 603.

3 *(The exhibit was displayed on the screen.)*

4 MR. RYBARCZYK: Which is in evidence, Your Honor.

5 THE COURT: All right. Thank you.

6 BY MR. RYBARCZYK:

7 Q. Ms. Berry, do you recognize this check?

8 A. Yes.

9 Q. When did you first see this check?

10 A. I don't remember. It was in December. I didn't see it
11 as soon as it came through. The process that we had for
12 receiving funds was that they came into our accounts
13 receivable department.

14 Then the check would get scanned and noted in
15 sales force and then the project liaisons, the people who
16 were on my team who I managed, would get an email
17 notifying -- with the notification: Hey, this project that
18 is in your portfolio got this -- received these revenues;
19 and we would see scanned copies of the checks.

20 But there was a slight delay. It wasn't like
21 depositing a check in a -- in a bank using your mobile app.
22 There was a little bit of a time lag.

23 Q. Did you show this check to Paul Vandeventer?

24 A. I must have -- I -- probably. I know I -- yeah, I --
25 yes. I know I talked about the check with him. I don't

1 know if I actually showed it to him.

2 Q. What did you talk with him about the check?

3 A. Umm, I guess I was wondering if we -- again, as I
4 testified earlier, I wasn't sure about the legality of us
5 getting a check from a campaign fund, a private campaign
6 fund.

7 Also, I'm not sure at what point, but I think I
8 did have some concerns about the optics of this -- of these
9 funds being used to support potentially a -- a family
10 member.

11 Q. Okay. Now, earlier you said -- you testified that --
12 with Mr. Harris about the purpose of this hundred
13 thousand-dollar donation.

14 A. Yes.

15 Q. Remember that? And what did he tell you it was for?

16 A. To hire someone who would be like a project, you know,
17 some kind of deputy or high-level administrative support.

18 MR. RYBARCZYK: Your Honor, permission to publish
19 Exhibit 510 again.

20 *(The exhibit was displayed on the screen.)*

21 BY MR. RYBARCZYK:

22 Q. Okay. Ms. Berry, who is this check from?

23 A. The Mark Ridley-Thomas Committee for a Better L.A.

24 Q. How much is the check for?

25 A. \$100,000.

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UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
WESTERN DIVISION

THE HONORABLE DALE S. FISCHER, JUDGE PRESIDING

UNITED STATES OF AMERICA,)
)
 Plaintiff,)
)
 vs.) NO. CR 21-485-DSF
)
 MARK RIDLEY-THOMAS,)
)
 Defendant.)
 _____)

REPORTER'S TRANSCRIPT OF PROCEEDINGS

Los Angeles, California

Friday, March 10, 2023, 11:41 A.M.

Day 4 of Jury Trial, Page 937 to 1046, Inclusive

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1 MR. RYBARCZYK: Your Honor, at this time, the
2 government moves to admit this exhibit, 543, pursuant to
3 Federal Rule of Evidence 803(6).

4 MS. AMRAM: No objection.

5 THE COURT: It's admitted.

6 *(Exhibit 543 received in evidence.)*

7 BY MR. RYBARCZYK:

8 Q. Now, I believe you testified earlier, Ms. Berry, that
9 this was from the African American Civic Engagement Project.
10 Is that AACEP?

11 A. Yes.

12 Q. And it's made payable, it says, to the
13 "Mark Ridley-Thomas Committee for a Better L.A."

14 Do you see that there?

15 A. Yes.

16 Q. And the description says "Return Funds."

17 Do you see that?

18 A. Yes.

19 Q. And it says it's for \$100,000.

20 Do you see that?

21 A. That is correct.

22 Q. Okay. Now, do you know, were the funds returned to
23 Mark Ridley-Thomas Committee for a Better L.A., the
24 \$100,000?

25 A. I believe they were.

1 MR. RYBARCZYK: I need to publish Exhibit 542,
2 which is already in evidence.

3 Can you show the bottom.

4 Q. Have you seen this check before, Ms. Berry?

5 A. Yes.

6 Q. Did you see it when you met with the government?

7 A. That's correct.

8 Q. Did you also see it previous to that?

9 A. I don't recall.

10 Q. Okay. What is this?

11 A. It's a check for \$100,000 from Community Partners to
12 the Mark Ridley-Thomas Committee for a Better L.A.

13 Q. And is it your understanding this is the return of
14 funds check?

15 A. That is my understanding.

16 Q. Now, Ms. Berry, earlier you testified that you're a big
17 supporter of some of the causes that the Defendant
18 championed in his years; is that correct?

19 A. That's correct.

20 Q. Did you have an understanding, did Paul Vandeventer
21 also share in supporting those causes?

22 A. I believe he did.

23 Q. To your knowledge, did Paul Vandeventer, or
24 Mr. Vandeventer, have a long-term relationship with the
25 Defendant?

1 personal affinity for the Defendant?

2 A. Yes.

3 Q. Did he consider him to have a friendship with the
4 Defendant?

5 A. I think he believed that. I can't possibly know what
6 was in his head, but I believe he thought that.

7 Q. What gave you that impression?

8 A. He would meet with the supervisor to talk about
9 projects they wanted to do together, I guess, over
10 breakfast. And...

11 Q. Now, going back to early December of 2017, before
12 the Mark Ridley-Thomas -- the check from the -- the
13 \$100,000 check from the Mark Ridley-Thomas Committee for a
14 Better L.A., at that time, before December 4th, 2017,
15 did Community Partners have enough money -- let me restate
16 that.

17 Did AACEP have enough money to hire a new
18 employee?

19 A. Not at that time.

20 Q. Now, whose responsibility was it to get donors to fund
21 that project?

22 A. The project leader or the project staff.

23 Q. And that -- and that would be to pay -- what would that
24 money be before? Would it be to pay for the salary of
25 employees that would be hired?

1 A. It could go for a range of expenses. Salaries were
2 usually the biggest portion of what projects needed to pay,
3 but it could go to pay for other activities. It could go to
4 pay for some of the costs that Community Partners incurred
5 on their behalf, like if they needed to get extra insurance
6 for an event or something like that.

7 Q. So would the fundraising also cover the health
8 insurance for an employee that was hired?

9 A. Yes.

10 Q. Would it also cover other fringe benefits that might be
11 available through Community Partners?

12 A. Yes.

13 Q. So without the \$100,000 donation from Defendant's
14 Mark Ridley-Thomas for a Better L.A. Committee, at that time
15 Community Partners could not have hired an employee?

16 A. Not for AACEP.

17 Q. Now, after you expressed concerns with the optics of
18 hiring Sebastian Ridley-Thomas as AACEP's director, did that
19 affect your relationship with Paul Vandeventer?

20 MS. AMRAM: Objection. Relevance.

21 THE COURT: Sustained.

22 BY MR. RYBARCZYK:

23 Q. After Community Partners were funded the \$100,000, did
24 Sebastian Ridley-Thomas ever become the director of AACEP?

25 A. I don't know, not while I was there.

1 Q. So at least until 2020 he did not become the executive
2 director?

3 A. As of June 2020, I don't believe he was, no.

4 Q. After Community Partners refunded the \$100,000, did
5 Defendant ever donate from his ballot committee again to
6 AACEP while you were there?

7 A. I don't recall the supervisor doing that.

8 MR. RYBARCZYK: At this time, the government
9 doesn't have further questions, Your Honor.

10 THE COURT: Cross-examination.

11 THE WITNESS: May I close the book, Your Honor?

12 THE COURT: Yes.

13 CROSS-EXAMINATION

14 BY MS. AMRAM:

15 Q. Good afternoon, Ms. Dunn Berry.

16 A. Good afternoon.

17 Q. You mentioned on direct that the donation was legal,
18 and I just wanted to ask you some questions about that.

19 When the check for \$100,000 came in to Community
20 Partners from the Mark Ridley-Thomas Ballot Committee for a
21 Better L.A., did you have a concern about whether that was
22 legal to accept?

23 A. I did.

24 Q. Did you get legal advice about that concern?

25 A. We did.

1 A. January 24th.

2 Q. Is that the day that you met with the Defendant in
3 person again to discuss --

4 A. Yes.

5 Q. -- AACEP?

6 A. Yes.

7 Q. Where did this meeting take place?

8 A. It happened later in the afternoon. The times are
9 inaccurate. It happened later in the afternoon. I remember
10 it was getting dusky. He said he would be briefly in the
11 parking lot of the Hall of Administration for the county
12 supervisors, could I meet him there. I said sure. There
13 were other people there in the parking lot. The head of
14 Metro, Phil Washington, was there and a number of other
15 people. So we had a brief conversation.

16 Q. Was it just you and him in that conversation to the
17 side?

18 A. Yes. It was sort of a sidebar to -- we weren't
19 socializing with everybody else at that point. They were
20 still there.

21 Q. What did you -- what did you talk about during that
22 conversation?

23 A. He asked me if we had been able to reach a decision
24 about the hiring of Sebastian, and I said no.

25 Q. Did you tell him anything else about why you hadn't

1 reached that decision yet?

2 A. I, at that point, had been encountering disagreement in
3 the office about whether we should go ahead and make that
4 hire. And I probably communicated that it was getting
5 complicated to be able to follow through on hiring
6 Sebastian. But I was still thinking about it and I hadn't
7 made a decision. And a couple of my staff were pushing
8 back. And I was concerned that it was complicated enough to
9 where if I was in disagreement with senior staff, this might
10 have to go to our board of directors.

11 And if it went to the board of directors, which is
12 a very conservative group of people, it -- this was my
13 thinking, I don't know how much of this I actually said.
14 But if it went to the board of directors, they would make
15 the most conservative of recommendations to me in the
16 decision, and it would probably be negative.

17 Q. During this meeting, was a final decision made as to
18 whether to bring Sebastian Ridley-Thomas on to the AACEP?

19 A. No.

20 Q. Okay. Did the Defendant tell you anything about that
21 decision? Did he ask you to make that decision?

22 A. He asked me had we come to conclusion.

23 Q. Was he asking you to come to a conclusion?

24 A. Yes. I took it that way, yes.

25 Q. Okay. What was your understanding by -- when he asked

1 you to come to a conclusion. What did he want?

2 A. Closure.

3 Q. A decision?

4 A. Yes.

5 Q. And based on his actions and your conversations with
6 him, what was your impression of what he wanted that answer
7 to be?

8 A. He would have liked me to hire Sebastian.

9 Q. Now, do you recall if you had another conversation with
10 the Defendant shortly after this meeting on January 24th?

11 A. Yes. On January 25th, my wife and I boarded a train
12 heading for Portland, Oregon, overnight train, late in the
13 afternoon on the 25th. And we had a conversation, kind of
14 broken up by tunnels and stuff like that going up the coast,
15 about this issue.

16 I, at that point, had decided we couldn't make the
17 hire, that I didn't want it to go beyond this staff
18 disagreement, and that we wouldn't be hiring -- we wouldn't
19 be bringing Sebastian aboard to lead the project.

20 Q. Was the staff disagreement primarily concerned with the
21 optics of the arrangement?

22 A. I would say, yes, they were concerned with the optics.
23 I'd at least convinced them of the legality of it. And,
24 more than anything, that was my concern.

25 Q. Now, you said -- you testified you were on the train

1 A. Yes.

2 Q. And does MRT refer to Mark Ridley-Thomas?

3 A. Yes, it does.

4 Q. And did Mark Ridley-Thomas control how Community
5 Partners used its funds?

6 A. No. Once we received funds, we had total legal and
7 managerial and fiduciary control over funds.

8 Q. Now, that second sentence that starts, "However, while
9 legally permissible, you should strongly consider the optics
10 of this arrangement as MRT's contribution to CP will be
11 publicly disclosed on MRT's campaign reports."

12 Do you see that?

13 A. I do.

14 Q. Does CP stand for Community Partners?

15 A. It does.

16 Q. Do you know if Mark Ridley-Thomas publicly disclosed
17 the donation on his campaign reports?

18 A. Yes, I do.

19 Q. And did he publicly disclose it on his campaign
20 reports?

21 A. On?

22 Q. Did he publicly disclose the donation on his campaign
23 reports?

24 A. I believe so. I haven't seen those disclosures, so I'm
25 assuming so. Okay.

1 MR. RYBARCZYK: Your Honor, I'm going to move to
2 strike for foundation. He said he hadn't seen the
3 disclosures. So he is assuming so, so I'm going to move to
4 strike that answer.

5 THE COURT: That will be stricken.

6 BY MS. AMRAM:

7 Q. Now, and in the last sentence, it says, "Alternatively,
8 as we discussed, you could consider segregating the funds to
9 be used for other purposes."

10 Do you see that?

11 A. I do.

12 Q. You know if Community Partners did, in fact, segregate
13 the funds?

14 A. No, we did not.

15 Q. Thank you. You can put that down.

16 Now, as you mentioned, the concern with hiring
17 Sebastian was optics; is that right?

18 A. One of the things, yes.

19 Q. And does optics mean how something looks?

20 A. Yes, it does.

21 Q. And you let Mark Ridley-Thomas know that that was the
22 concern, right?

23 A. One of the concerns, yeah.

24 Q. And your concern with optics was that Community
25 Partners would look like the Ridley-Thomas Family Charity?

1 A. That expression is really a reflection of the kind of
2 stressful environment that was at Community Partners between
3 me and my senior staff, our disagreement about whether this
4 was appropriate or not. There was a heightened sense of,
5 How would we be perceived?

6 Q. And is it fair to say that there were a number of
7 projects at Community Partners that were connected to
8 Supervisor Ridley-Thomas?

9 A. Over the years, many. And very effective ones.

10 Q. And the government asked you about one of them, which
11 was the Institute for Nonviolence, correct?

12 A. Correct.

13 Q. And was that started by Mark Ridley-Thomas's wife,
14 Avis?

15 A. Shortly after her retirement from the Los Angeles City
16 Attorney's Office.

17 Q. And had Mark Ridley-Thomas donated to the Institute for
18 Nonviolence?

19 A. Through -- I believe in retrospect learning through the
20 ballot committee. And other contributions came through I
21 want to say his office. But I don't have a list in front of
22 me. I'm sorry.

23 Q. Had USC also donated to the Institute for Nonviolence?

24 A. I would have to see a list of the donors. I'm sorry.
25 I don't have those details.

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UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
WESTERN DIVISION

THE HONORABLE DALE S. FISCHER, JUDGE PRESIDING

UNITED STATES OF AMERICA,)
)
 Plaintiff,)
)
 vs.) NO. CR 21-485-DSF
)
 MARK RIDLEY-THOMAS,)
)
 Defendant.)
 _____)

REPORTER'S TRANSCRIPT OF PROCEEDINGS

Los Angeles, California

Tuesday, March 14, 2023, 7:44 A.M.

Day 5 of Jury Trial, Page 1047 to 1184, Inclusive

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1 Q. Okay. Did there come a time in 2017, December
2 specifically, when Dean Flynn asked you to reach out to the
3 Price School of Public Policy in order to expedite a hiring
4 of Sebastian Ridley-Thomas with a joint appointment, a
5 professorship essentially, between the School of Social Work
6 and the School of Public Policy?

7 A. I'm sorry. You said September or December?

8 Q. December of 2017.

9 A. December, yes, correct.

10 Q. And what instructions did you get from
11 Dean Marilyn Flynn around that time?

12 A. Umm, I would have to refresh my memory with emails,
13 documents and such. But, essentially, that we were
14 expediting his hire as a Professor of Practice which was
15 a -- a specific designation for a faculty member within the
16 university and that there needed to -- this needed to be
17 expedited as quickly as possible.

18 Q. Had you ever received this type of request from
19 Dean Marilyn Flynn before?

20 A. No, not for a faculty member.

21 Q. Was it a part of your role to assist in the onboarding
22 and hiring of faculty candidates within the School of Social
23 Work?

24 A. Not at that time. When I was a student worker, I would
25 coordinate our tenure line visits. So, essentially, tenure

1 A. Yes.

2 Q. And Regina Nordahl, who's that?

3 A. So you can see in her title below that she was an
4 associate dean of the Price School, and my understanding was
5 she was in charge of faculty affairs so essentially bringing
6 on faculty.

7 Q. And she's writing you a message here. What was this
8 message that she's sending you, as you understood it?

9 A. So as I understood it, she had had a conversation with
10 her dean, Jack Knott at the Price School, and had been asked
11 to reach out to me regarding a half-time position for
12 Sebastian Ridley-Thomas.

13 And then as it mentions, it would be a joint
14 appointment which was, you know, not terribly uncommon,
15 between the Price School and social work.

16 Q. And do you see where she says: I'm traveling to the
17 East Coast starting tomorrow, returning on Thursday,
18 December 21st.

19 And she continues: Given the holidays with key
20 employees on vacation, it is going to be difficult to work
21 on this until January 2nd, 2018.

22 And my question to you is: In December --
23 mid-December of any given year at USC while you were there,
24 what's the level of activity on the campus?

25 A. So during that time, it's very low. Essentially, this

1 would've been after finals had concluded so a great number
2 of faculty go on vacation during that time because there's
3 no classes in session.

4 Students are primarily gone because, again,
5 they're not in classes until mid-January. So, essentially,
6 between December 13 -- or mid-December and mid-January on
7 any given year, it's a very, very quiet time on campus.

8 Q. And she indicates that -- she says that there's -- it's
9 going to be difficult to get this accomplished given the
10 holiday with employees on vacation.

11 Is that consistent with what your understanding is
12 in terms of what's likely to be the case in terms of staff
13 availability around this time in the school year?

14 A. Yes.

15 Q. Is this heading into what is called like winter break?

16 A. Yes. It's part of winter break.

17 MR. MORSE: So if we could zoom out, please.

18 *(The exhibit was displayed on the screen.)*

19 BY MR. MORSE:

20 Q. And we could go to your response here at the top of
21 page 2. It appears you respond to Regina Nordahl.

22 And what date is that?

23 A. So that's December 14th of 2017.

24 Q. At 9:48 a.m.?

25 A. Yes.

1 eventually extended an offer for a joint appointment, a
2 professorship, a Professor of Practice; is that correct?

3 A. Yes.

4 Q. And that was in March of 2018; is that right?

5 A. That's my recollection, yes.

6 Q. So during the time that you had initially been looped
7 into this project, mid-December of 2017, you'd agree that
8 that was around the time?

9 A. Yes.

10 Q. Until the plane was landed so to speak, he got the
11 offer letter.

12 Did you follow up with the School of Public Policy
13 multiple times at Dean Flynn's direction to establish or to
14 figure out what the -- when this was going to get done?

15 A. Yes.

16 Q. Did this appear to be something that was very important
17 to Dean Marilyn Flynn that this get done?

18 A. Yes. She followed up regularly.

19 MR. MORSE: I want to publish Exhibit 73 which has
20 already been admitted into evidence.

21 *(The exhibit was displayed on the screen.)*

22 BY MR. MORSE:

23 Q. Have you seen Exhibit 73 before?

24 A. Yes, I have.

25 Q. What is Exhibit 73?

1 A. It's an email from Marilyn to me. And reading the
2 original message below, it looks like it was a forward of an
3 original message from Sebastian Ridley-Thomas to both
4 Dean Marilyn Flynn and both Jack Knott who is JK -- or
5 jhknott@price regarding the hiring.

6 Q. And in the email, the original email which appears to
7 be from Sebastian Ridley-Thomas to Dean Flynn and
8 Jack Knott, that's dated January 17th?

9 A. Yes.

10 Q. Okay. And it says in the third substantive paragraph,
11 "As is known, since last we communicated, I have resigned my
12 post in the State Assembly in order to improve my health."

13 Were you aware around this time that
14 Sebastian Ridley-Thomas was no longer an assemblymember?

15 A. I believe I discovered this via this email.

16 Q. And in the third -- the last paragraph, substantive
17 paragraph, Sebastian Ridley-Thomas appears to be indicating,
18 "Is there a written offer or agreement that I might review
19 as we think this through together?"

20 Now, this email is sent January 17th, so is it a
21 little bit after what Dean Marilyn Flynn had told
22 Sebastian Ridley-Thomas when this thing would get wrapped
23 up?

24 A. Yes. I believe she referred to mid-January or
25 January 15th specifically.

1 Q. So when you got this email, was it your understanding
2 that Sebastian Ridley-Thomas was now following up?

3 A. Yes.

4 Q. And Dean Flynn writes a message to you. How did you
5 interpret that to mean?

6 A. Umm, with a little bit of frustration. "Would you jump
7 all over this," question mark? "We need to get this
8 finished." Very direct.

9 Q. What makes you think it was a little frustrated?

10 A. Just the tone of the email. I mean, she did send
11 emails quickly at times, but usually if it was of high
12 priority or, you know, essentially she was trying to get
13 something wrapped up, it would appear this way.

14 Q. And did you then take steps to get this wrapped up?

15 A. I did.

16 Q. Was this one of the requests from Marilyn Flynn that
17 caused you to follow up at the School of Public Policy to
18 see what was going on?

19 A. Yes.

20 Q. Now, as we discussed, the -- an offer letter was
21 eventually extended; correct?

22 A. Yes.

23 MR. MORSE: Okay. I want to show you Exhibit 216
24 which has been admitted into evidence.

25 *(The exhibit was displayed on the screen.)*

1 Q. Now, it says "So as to facilitate the completion of
2 Ms. Smith's onboarding with the United Way in a timely
3 manner."

4 Are you aware or were you aware at the time of any
5 rules at USC regarding USC making payments to outside
6 entities in order for that outside company or entity to be
7 able to pay the salary of someone else? Were you aware of
8 any rules as to that?

9 A. Yes. My understanding is that that was prohibited.

10 Q. What do you mean by that?

11 A. Umm, so essentially, we weren't allowed to give money
12 from the university that was specifically for the purpose of
13 paying someone's salary outside. Mostly to protect fair
14 hiring practices and USC's, you know, standards when it
15 comes to paying salary and hiring employees.

16 Q. Were you ever present in a room or otherwise with
17 Dean Marilyn Flynn where this rule was discussed in your
18 presence and in Dean Marilyn Flynn's presence?

19 A. Yes.

20 Q. Tell us about that.

21 A. So I had had many discussions over the years about our
22 sponsorships. So as I mentioned, those were a way for us to
23 support affiliate organizations that we worked with really
24 closely, and there had been conversations over the years
25 about attempting to compensate a staff member at one of the

1 affiliate organizations for work they were supporting us in.

2 So one example is we worked with an initiative
3 called the Grand Challenges of Social Work, and the employee
4 that managed that initiative was an existing employee of a
5 different university and Marilyn thought that that person
6 should be compensated for essentially the extra work that
7 they were doing related to the Grand Challenges initiative;
8 and I knew that we were not able to do that, process that
9 request or pursue that in any way based on the instruction
10 we received from our budget team which in this case was Lynn
11 and Adriana.

12 Q. And Dean Marilyn Flynn was present for some of those
13 conversations?

14 A. Yes.

15 Q. So as far as you know, Dean Marilyn Flynn would have
16 been aware of that rule?

17 A. As far as I know, yes.

18 MR. MORSE: If we could zoom out from this portion
19 of this email.

20 *(The exhibit was displayed on the screen.)*

21 BY MR. MORSE:

22 Q. When you received this email from Dean Marilyn Flynn,
23 did there appear to be an attachment to the email?

24 A. Yes.

25 MR. MORSE: If we could go to that attachment of

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UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
WESTERN DIVISION

THE HONORABLE DALE S. FISCHER, JUDGE PRESIDING

UNITED STATES OF AMERICA,)
)
 Plaintiff,)
)
 vs.) NO. CR 21-485-DSF
)
 MARK RIDLEY-THOMAS,)
)
 Defendant.)
 _____)

REPORTER'S TRANSCRIPT OF PROCEEDINGS

Los Angeles, California

Tuesday, March 14, 2023, 11:28 A.M.

Day 5 of Jury Trial, Page 1185 to 1317, Inclusive

WIL WILCOX, CSR 9178
Official Reporter
First Street Courthouse
350 West 1st Street
Room 4311
Los Angeles, CA 90012
wil.wilcox@gmail.com

1 Q. When was the first time you saw this document, this
2 check?

3 A. In my interview with the government.

4 Q. Okay. And again, the request first came into your
5 inbox to get \$100,000 out of USC on May 3rd, correct?

6 A. Correct.

7 Q. And the date on this check is May 2nd?

8 A. Correct.

9 MR. MORSE: Okay. If we could zoom out of Page 2
10 and go to Page 1 of Exhibit 107, please. And if we could
11 zoom in on just the message.

12 Q. All right. Now, does this appear to be a message to
13 Dean Marilyn Flynn from Mark Ridley-Thomas?

14 A. Yes.

15 Q. Can you read that message, the first paragraph?

16 A. "Please find enclosed tangible acknowledgement of the
17 important work of the Suzanne Dvorak-Peck School of Social
18 Work in Los Angeles and beyond. As Dean, these funds can be
19 used at your discretion in order to best facilitate the
20 impressive policy and practical work of the school and it's
21 impact in the community.

22 "I look forward to witnessing and supporting the
23 school's continuing achievements.

24 "With hope, Mark Ridley-Thomas."

25 Q. Do you see anything in that letter about sending this

1 \$100,000 to the United Ways of California the next day?

2 A. No.

3 Q. If you'd seen this letter and if you'd seen this check
4 before May 3rd, 2018, would this have given you any pause or
5 concern with respect to this payment that you were assisting
6 to be processed to the United Ways?

7 A. It would have given me pause, yes.

8 Q. Why?

9 A. Because the sender of the letter and the check is the
10 same as the person who was directing the money that was
11 going out of the university the next day.

12 Q. Is that common, for money to be funneled through the
13 university under essentially false pretense?

14 MS. DURIE: Objection. Argumentative.

15 THE COURT: Sustained.

16 BY MR. MORSE:

17 Q. Is it common for, in your experience of processing
18 payments from Dean Marilyn Flynn, for monies to come into
19 the university with a stated purpose and then go out of the
20 university with another stated purpose?

21 A. So at the time, I didn't have any knowledge of money
22 coming in to the university, per se, other than
23 tangentially. So I can't speak to the money coming in. So
24 really, the money coming out was really all I had visibility
25 to, particularly in this case.

1 Q. The fact that this money, this \$100,000 was going to an
2 organization, was it an organization that you knew to be
3 associated with Sebastian Ridley-Thomas?

4 A. Yes.

5 Q. Would that have concerned you?

6 A. Yes.

7 Q. Why?

8 A. You mean, if I was aware of the money that had come in
9 prior to the money going out or just for the second?

10 Q. If you had been aware of the money coming in from
11 Mark Ridley-Thomas.

12 A. Yes.

13 Q. Why?

14 A. Because I was aware of their relation and that the
15 check was going to an organization that was supporting the
16 work of Sebastian Ridley-Thomas.

17 Q. Why would that have given you concern, knowing that
18 relationship?

19 A. Mostly because it's not something that we had been
20 involved in before as a school and as the university. And
21 so I didn't -- I wouldn't have understood the direction for
22 us as a school. So it would have given me concern, seeing
23 that we had received a check and then gotten direction for
24 how that money essentially should be spent on behalf of the
25 university.

1 And you need to slow down, Ms. Durie.

2 MS. DURIE: I will endeavor to do that.

3 Q. Let me just ask that last question again.

4 A. Okay.

5 Q. Dean Flynn never told you to keep it a secret that
6 Sebastian Ridley-Thomas was a student in the School of
7 Social Work and a professor of practice in the School of
8 Social Work, right?

9 A. Not explicitly, no.

10 Q. There was nothing in here that said, "Don't tell anyone
11 else," right?

12 A. No.

13 Q. Now, part of your job responsibilities was to work with
14 Sebastian Ridley-Thomas specifically on a nonprofit called
15 PRPI, right?

16 A. Yes. That became one of the things I was assigned at
17 the time.

18 MS. DURIE: Let's take a look at GTX-106 in
19 evidence. And if we can blow that up.

20 Q. This is an email from Dean Flynn to you in April of
21 2018 about new assignments, right?

22 A. Yes.

23 Q. And she lists a couple of things. And then the third
24 thing is, "Continuing work with Sebastian Ridley-Thomas,
25 especially on PRPI," right?

1 A. Yes. It's misspelled, but that's what she was
2 referring to.

3 Q. Dean Flynn was sort of prone to typos, right?

4 A. I think by the exhibits, I can say confidently yes.

5 Q. And so you understood that you, as a USC employee, were
6 being told to work with Sebastian Ridley-Thomas on PRPI?

7 A. Yes.

8 Q. Okay. Now, you understood PRPI to be a nonprofit,
9 right?

10 A. I learned through the process of supporting that, yes,
11 it was a nonprofit.

12 Q. A nonprofit that was engaged in activities about voter
13 engagement in the African American community?

14 A. Yes.

15 Q. And did you understand that Sebastian Ridley-Thomas was
16 doing work with PRPI as part of his academic work as a
17 professor of practice?

18 A. That connection was not made for me, no.

19 Q. Did you ever ask Dean Flynn why you were being asked to
20 assist him as part of your job with PRPI?

21 A. No. The only information I had gotten was that
22 Sebastian needed a level of support when he was at City
23 Center, which is where our spaces were co-located. And
24 since I was the designated special projects person, that
25 would be something that I would be doing.

1 Q. Fair enough.

2 So you mentioned City Center. That is an office
3 location where USC had offices; is that right?

4 A. Yes.

5 Q. And it was also a location where United Ways of
6 California had offices; is that right?

7 A. So, again, it could be semantics. I'm not an expert.
8 But United Way did. And I don't know if that's different
9 from United Ways of California or the other reference that
10 I've seen is, again, United Ways of America.

11 Q. Fair enough.

12 Some United Way entity had space there?

13 A. Yes.

14 Q. And you were asked to help show Sebastian Ridley-Thomas
15 some office space in that building that he might be able to
16 use; is that right?

17 A. Yes. My understanding was on this School of Social
18 Work floor, so that would have been the 14th floor.

19 Q. Right. And that was space that was going to be used by
20 Sebastian Ridley-Thomas in connection with his work with
21 PRPI; did you understand that?

22 A. As a part of that, yes.

23 Q. And, ultimately, he was provided with a workstation in
24 that space; is that right?

25 A. I believe it was two, but yes.

1 Q. Okay. Sort of cubes, basically?

2 A. Yeah. It was an open-concept space, so two cubicles.

3 Q. And then, you continued to work with
4 Sebastian Ridley-Thomas on PRPI thereafter, right?

5 A. I think "work with" is very intensive. Basically, I
6 would make sure he had rooms scheduled when that group would
7 meet. I wasn't involved in any of the direct work of that.
8 It was more coordinating space. And the building has
9 security requirements where an individual needs to be added
10 to security to get up. So things like that. More
11 admin-type support.

12 Q. Fair enough. Fair enough.

13 Let's take a look at GTX-162 in evidence.

14 This is an email that you had sent to
15 Marilyn Flynn and John Clapp on June 18th, 2018. You were
16 talking about some of the projects that you were working on,
17 right?

18 A. Yes.

19 Q. And you were talking about how those were going to be
20 transitioning with the transition from the deanship from
21 Marilyn Flynn to John Clapp, right?

22 A. Based on the date, yes.

23 Q. And if you turn to the next page, you'll see that you
24 had prepared a list of things that you're working on.

25 Do you see that?

1 it's more -- it's a backup of documentation. And it's part
2 of our guidelines and policies with -- with USC.

3 Q. And is the invoice a document that USC would fill out
4 describing the amount of money that they're paying out and
5 the description, or is it something that the recipient would
6 fill out?

7 A. This is something that should come from the vendor,
8 from the recipient.

9 Q. Okay. So it's essentially, like, a bill, if you will?

10 A. Yes.

11 Q. And I'm going to show you Exhibit 116, which has
12 already been admitted into evidence.

13 Showing you Exhibit 116, have you seen this
14 document before?

15 A. Yes.

16 Q. Is this an email you sent?

17 A. This is an email I sent, yes.

18 Q. And who are you sending this email to?

19 A. I am sending it to Marilyn and Carmen.

20 Q. And why are you sending this document?

21 A. The dean asked me for a template of what an invoice
22 should look like. So I sent her -- in this email, I say, an
23 invoice should include a description indicating that the
24 funds will be used by June 30th in order for the payment to
25 be released from the current fiscal year.

1 Q. And why are you giving those instructions that the
2 invoice should include a description indicating that the
3 funds will be used before June 30th, 2018?

4 A. Because this request is already in May. And our
5 university accounts are on a fiscal calendar. So all
6 activity that is to be paid from the current fiscal year
7 needs to happen between July 1st and June 30th. Because
8 we're -- that's just how our budgets work. So if -- if
9 we're going to use the current -- our budget -- our current
10 budget, we need to show that within the invoice.

11 Q. So when you say that the funds will be used by
12 June 30th, 2018, are you saying that the actual recipient of
13 the money has to indicate to you that they will use the
14 money that you're giving them by the end of June 2018?

15 A. That's correct.

16 Q. So this isn't about USC giving the money, necessarily.
17 It's about the timing by which the recipient will use the
18 money.

19 A. Yes, that's correct.

20 Q. What happens if the recipient is not going to be using
21 the money by the end of the fiscal year, in this case,
22 June 30th, 2018?

23 A. So if we know that the activity is going to cross
24 fiscal years, we would have to -- I would -- I would have
25 had to process or request two separate checks.

1 So each check would be kind of tagged to that
2 current fiscal year. So if there was -- if there was
3 activity that was going to be from July 1st and on, I would
4 have had to process a separate check request so that that
5 amount hits the next fiscal year.

6 MR. MORSE: All right. And if we could exit out
7 of the zoom and just see the broad view of this email.

8 Q. Now, you indicated you attached a template to this
9 document; is that correct?

10 A. Yes.

11 MR. MORSE: If you could just go down to the next
12 page.

13 Q. What are we looking at on Page 2 of Exhibit 116?

14 A. So I sent -- this was one of the templates I sent of
15 an invoice of a sponsorship that I also processed. And
16 what I really wanted -- so, like, if the invoice isn't set
17 up right, then there's, like, delays in payment being
18 issued.

19 So, like, there had to be the dates, the name of
20 company, they're billing us, all that information. And
21 then, when the -- in this case, the event was happening.

22 Q. And what we're looking at here is the template that you
23 sent to Dean Marilyn Flynn, not the one that was related to
24 the \$100,000 payment; is that correct?

25 A. Yeah. This is just an example, to be used as an

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UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
WESTERN DIVISION

THE HONORABLE DALE S. FISCHER, JUDGE PRESIDING

UNITED STATES OF AMERICA,)
)
 Plaintiff,)
)
 vs.) NO. CR 21-485-DSF
)
 MARK RIDLEY-THOMAS,)
)
 Defendant.)
 _____)

REPORTER'S TRANSCRIPT OF PROCEEDINGS

Los Angeles, California

Wednesday, March 15, 2023, 7:48 A.M.

Day 6 of Jury Trial, Page 1318 to 1513, Inclusive

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Los Angeles, CA 90012
213-894-1782
patcuneo1600@gmail.com
www.patcuneo.com

1 Q. So it did not get sent out on that date, May 7th,
2 then?

3 A. No, it was not sent out on May 7th.

4 Q. Okay. Did there come a time on May 7th where you had
5 a discussion about the check with Dean Marilyn Flynn?

6 A. Umm, Marilyn Flynn -- well, I walked in. She was -- it
7 was in the morning time, and she came in and there was a
8 conversation around the check.

9 And I don't remember all the details, but she just
10 looked at me -- or she sat down and she just looked at me
11 and said: If -- if this check doesn't get cut, I will --
12 I'm going to be in trouble.

13 Q. So let me just back up for a second. You said that she
14 came in. Where did -- she came into a room that were you
15 in?

16 A. Right. She walked into my office.

17 Q. Okay. Was it common at that time for
18 Dean Marilyn Flynn to go directly into your office and chat
19 with you?

20 A. No, it wasn't common. Most interactions were just like
21 good morning and she would walk right through and go to her
22 office.

23 Q. Can you walk us through that, please. So you're
24 sitting in your office and what happens?

25 A. She comes in. So rather just walking straight into her

1 office, she comes into my office and we were talking
2 about -- she must have been asking me for an update on the
3 check and I didn't have an update.

4 We still didn't have a vendor or anything like
5 that. So she just -- she told me: If -- if a check isn't
6 cut, I'm going to be in a lot of trouble or...

7 Q. And did she offer any other details about why she'd be
8 in trouble or who she'd be in trouble with?

9 A. No, she -- she did not.

10 Q. You indicated she sat down in chair in your office?

11 A. Right, yeah, she sat down.

12 Q. Had she ever visited your office to sit down and chat
13 with you before?

14 A. No.

15 Q. Had -- did you have the kind of relationship or rapport
16 with her where she would share her issues at work and things
17 that she may get in trouble for?

18 A. No, we did not have that type of relationship.

19 Q. Okay. How did you respond?

20 A. Umm, I was -- I responded with just kind of giving
21 her -- like repeating myself about the summary of where
22 we -- what the status was and we were still waiting for a --
23 we were still waiting for a -- an update on the -- on the
24 vendor. And that was -- it was a really short conversation
25 and that was -- that was it.

1 Q. What does that department do?

2 A. So that check -- that -- that department would've
3 reviewed these -- the check request and they -- they review
4 that the guidelines are being followed before the -- they --
5 before the request is approved and a check can be issued.

6 Q. Did you receive any notifications or messages from
7 disbursement control concerning this particular check?

8 A. Yes, I did.

9 Q. What kind of message did you receive?

10 A. It was a -- it was a message from disbursement control
11 asking -- they wanted to know the specific dates of this
12 event -- of this sponsorship.

13 MR. MORSE: Let me publish Exhibit 140. Excuse
14 me, no. What do we have -- no, sorry. If you can take this
15 down.

16 May I have one moment, Your Honor?

17 THE COURT: Yes.

18 *(Pause in the proceedings.)*

19 MR. MORSE: If we may publish Exhibit 148, please.

20 *(The exhibit was displayed on the screen.)*

21 BY MR. MORSE:

22 Q. I'm showing you what's been admitted into evidence as
23 Exhibit 148. Do you recognize this exhibit?

24 A. Yes.

25 Q. Okay. What is this document?

1 A. I -- this is an email to Marilyn with a screen-shot of
2 the ask from disbursement control that they're -- that
3 disbursement control's asking for exact dates of this
4 payment and I'm asking Marilyn for that information.

5 Q. Did you have an understanding as to why sort of
6 procedurally disbursement control would want to know details
7 about the dates of this payment?

8 A. Yeah. So they wanted to know the dates of the payment,
9 again, because it's on a fiscal year and they wanted to know
10 when the activity was going to -- if -- if the activity was
11 true to be -- to happen before June 30th, they needed to
12 know that so that the check can hit the current fiscal year
13 budget.

14 Q. Are you referring to what we talked about yesterday,
15 that the recipient of the funds have to spend the money by
16 the end of the fiscal year in order for USC to cut one
17 check?

18 A. Yes. So in order for this check -- this one check to
19 be cut, they want to make sure that that date is before
20 June 30th.

21 Q. Okay. And in terms of a disbursement control
22 department generally, is this a department that can reject
23 certain requests for payment if they don't believe that the
24 description of the payment is adequate or meets with the USC
25 rules?

1 A. Yes.

2 Q. So if there were information given to disbursement
3 control that did not coincide or was not consistent with USC
4 policy, this department would be one of the departments that
5 could decline to extend the payment; is that correct?

6 A. That's correct, yes.

7 Q. So is it accurate to say that a school like the School
8 of Social Work can't just cut checks on behalf of USC unless
9 it meets with a strict sort of guidelines and rules within
10 USC? Is that correct?

11 A. Yes, that's correct.

12 Q. So you emailed Dean Marilyn Flynn asking for the dates.
13 It looks like this was on May 8th, 2018 at 4:29 p.m.

14 A. Uh-huh.

15 Q. Did you hear back from Dean Marilyn Flynn?

16 A. I did not.

17 Q. What did you do next?

18 A. So I went to her office, I knocked on her door, and she
19 was sitting there. She was typing, she was working. And I
20 asked her: Hey, did you see my email? Disbursement control
21 wants to know the dates of -- for this payment.

22 And she was kind of like a little bit annoyed that
23 I bothered her, her workflow, but she verbally gave me the
24 dates.

25 Q. Why did you find it necessary to go into her office as

1 opposed to just waiting for her to respond to your email?

2 A. Because, umm, again, I was just -- I was trying to do
3 my job and my job was to make sure that this sponsorship was
4 issued. So if I didn't respond to Donald, it was already
5 4:30, this was probably going to take another day before it
6 was finalized.

7 Q. And did she provide you with the information on when
8 these funds were to be expended by the recipient?

9 A. She did, yes.

10 Q. What did she tell you?

11 A. I don't remember the exact dates. It was May. And
12 the -- the dates she gave me, I -- I went back to my desk
13 and I responded to Donald within the disbursement voucher.

14 Q. Did you put that in the system that we were talking
15 about earlier where the disbursement control can communicate
16 with people submitting payment requests?

17 A. I did, yes.

18 MR. MORSE: If we could please publish
19 Exhibit 143, which has been admitted into evidence, please.

20 *(The exhibit was displayed on the screen.)*

21 BY MR. MORSE:

22 Q. All right. I'm showing you Exhibit 143. It appears to
23 be a three-page document. In the upper left-hand corner it
24 says "Disbursement Voucher." Do you see that?

25 A. Yes.

1 Q. Okay. So what are we looking at here on page 1 of
2 Exhibit 143?

3 A. This is a -- this is like -- again, this is more --
4 it's a receipt of -- of the action that I took. So this is
5 the information I actually took -- put into our
6 disbursement -- into our -- into our system.

7 In the explanation, I added, you know, that this
8 was a sponsorship and I took that information from the
9 survey and I entered the amount of the check.

10 It has the vendor information, the vendor address
11 which was what we were waiting for. Like the vendor
12 address, I can't just go in there and -- and delete that or
13 add that. That's something that's -- that's just automatic
14 by the name of the vendor, and that's why it was so
15 important to get the vendor accurate, so that the address
16 populates and it would go to the right place.

17 So -- so that's -- that's -- this is just like
18 a -- it's a receipt of -- I always call it like a receipt of
19 the action I took to request the check.

20 Q. And are we also looking at -- is this also like a
21 snapshot of a database where information is input into a
22 system relative to this check request?

23 A. It's a -- yeah. Yes. It's a snapshot, yes.

24 Q. Okay. So this would have been information that you put
25 into the system relative to this payment; is that correct?

1 A. Yes.

2 MR. MORSE: Okay. If we could go to page 2 of
3 this exhibit, please.

4 *(The exhibit was displayed on the screen.)*

5 BY MR. MORSE:

6 Q. Okay. Page 2 of this exhibit, are we looking at
7 again -- what's this system called by the way? Does this
8 have a name?

9 A. It's our Kualu system.

10 Q. Do you mind spelling that?

11 A. K-u-a-l-i. K-u-a-l-i. Yes, Kualu.

12 Q. Okay. So it looks like a -- in what we've highlighted
13 here. It says "Contact Name" and it has a few -- it says
14 "Check Pickup," and "Show," "Tax," "Show." Is this like a
15 database where you could click on these things and see
16 details of this payment?

17 A. Yes.

18 Q. Okay. And in the bottom portion of this document that
19 says "Notes and Attachments," what's this area of this
20 database?

21 A. So that's just like additional information where we can
22 communicate with disbursement voucher, but at the same time
23 we can add our backup documentation as proof of the payment.

24 So the first line is -- it's a -- the document
25 that's attached is the invoice. It's the invoice for United

1 Ways. And then line 2, we have the opportunity within the
2 system if we wanted to add additional approvers, but because
3 it's a sponsorship, the dean had to be added as an ad hoc so
4 she would have to approve via ad hoc. It's like an
5 electronic approval. That's what that is.

6 Q. Okay. So under "Note and Attachments," it says "Posted
7 Timestamp" and it says "Author" and a number of other
8 entries.

9 We can see there are two here and the timestamp
10 shows -- correct me if I'm wrong -- the timestamp shows the
11 activity and the author shows who did that activity; is that
12 correct?

13 A. Yes, that's correct.

14 Q. So in line item 2, when it says "Approval by
15 Dean Marilyn Flynn via adhoc," you're the author. Is that
16 you communicating to disbursement control that
17 Dean Marilyn Flynn approves this?

18 A. It's -- yeah, it's me adding another -- adding an
19 approver. So it's kind of like an extra approval step to
20 the document. So I added that approval request to this
21 document.

22 Q. Okay. And at the bottom of the screen there, it looks
23 like another's line item is starting. The posted timestamp
24 is May 8th, 2018. The author says "Burnett" and the note
25 text says "Please confirm the dates that."

1 Can you explain what that message is?

2 A. Umm, is that message complete or is there --

3 MR. MORSE: Well, good point. Let's go down to
4 the next page where I believe it continues. So page --
5 let's go to the top of page 3 of Exhibit 143, and if we
6 could highlight the top portion, No. 3 and 4.

7 *(The exhibit was displayed on the screen.)*

8 BY MR. MORSE:

9 Q. Do you see what we've highlighted at the top of
10 Exhibit 143?

11 A. Yes.

12 Q. So at the bottom of page 2 of Exhibit 143, we started
13 to see a message that was talking about the dates. Did you
14 see the continuation of that message?

15 A. I do, yes.

16 Q. Can you explain line item 3? What's that that we're
17 looking at?

18 A. So this is the -- the request from Donald Burnett who
19 is -- who is part of our disbursement control office; and
20 he's asking us for the dates of -- of the -- of the -- for
21 which the event is for.

22 Q. And is that the message that prompted you to then send
23 the email to Dean Marilyn Flynn that we saw in the last
24 exhibit?

25 A. Yeah. Yes, it is.

1 Q. Okay. And then the next line item, line item 4, again
2 May 8th, 2018, 4:45 p.m., there's a message that appears to
3 be attributed to you.

4 Hi, Donald. It's support of a survey May 1, 2018,
5 to May 31, 2018. Is that you relaying the information that
6 you got from Dean Marilyn Flynn?

7 A. Yeah. Yes, those are -- when I went to Marilyn Flynn's
8 office, those are the dates that she told me this was --
9 this event was for, so I went back to my desk and I -- I
10 entered those dates there.

11 Q. Did Dean Marilyn Flynn tell you that this payment was
12 actually for the purpose of onboarding an employee and
13 playing -- paying an employee's salary for an outside
14 entity?

15 A. No, she never told me that.

16 MR. MORSE: All right. If we could zoom out of
17 that exhibit, please.

18 BY MR. MORSE:

19 Q. Once this payment was processed, did you contact the
20 USC employees, including Michele Clark, and let them know
21 that the payment had been finalized?

22 A. I don't remember.

23 MR. MORSE: If we could publish Exhibit 147,
24 please. It's already been admitted into evidence.

25 *(The exhibit was displayed on the screen.)*

1 Q. Okay. And also in the upper right-hand corner we see
2 actual delivery. Do you see that?

3 A. Yes, I do.

4 Q. Is that your understanding of when it was delivered?

5 A. Yes.

6 Q. There's some handwriting on this document. It says
7 "Check to United Ways delivered." Do you recognize that
8 handwriting?

9 A. That's my handwriting.

10 Q. Now, after you processed this check and assisted in it
11 being sent out to the United Ways of California, did you
12 later find out that there was a \$100,000 payment to USC that
13 came from the Mark Ridley-Thomas for a Better L.A. Ballot
14 Committee the day before you were asked to assist in this
15 transaction?

16 A. I found out later, yes.

17 Q. If you -- did you later find out that that -- after
18 that hundred thousand dollars was sent to USC, that that's
19 when you got involved and eventually processed this payment
20 for a hundred thousand dollars?

21 A. Yes.

22 Q. Did you find out that that payment went to an
23 organization that was associated with someone named
24 Sebastian Ridley-Thomas?

25 A. Yes. Yes.

1 Q. Did you find out that that person was
2 Mark Ridley-Thomas's son?

3 A. Yes.

4 Q. Did you know that when you were attempting to process
5 this check?

6 A. No. I had no idea, no.

7 Q. If you had known that information, would you have
8 handled this differently?

9 A. Yeah. Yes.

10 Q. Why do you say that?

11 A. Because, umm, that -- I -- I really value my job. It's
12 my livelihood. I -- if I would have done something like
13 that, I could've lost my job and I worked really hard to get
14 where I am.

15 MS. DURIE: Your Honor, I move to strike the
16 comment as being -- lacking foundation, being speculative.

17 THE COURT: That will be stricken.

18 BY MR. MORSE:

19 Q. Well, let me ask you this, Ms. Gonzalez: If you were
20 to have placed incorrect information, if you tried to
21 mislead the disbursement control department, for example, as
22 to the true purpose of that hundred-thousand-dollar payment,
23 could that have resulted in disciplinary action for you?

24 MS. DURIE: Objection. Lacks foundation, calls
25 for --

1 Q. What do you do as a special agent?

2 A. I'm assigned to a Public Corruption Squad currently in
3 Orange County.

4 Q. How long have you investigated public corruption cases?

5 A. I began investigating public corruption cases in
6 Chicago for a couple years so total -- about -- a little
7 over 10, 11 years so...

8 Q. Are you familiar with the defendant,
9 Mark Ridley-Thomas?

10 A. Yes, I am.

11 Q. How are you familiar with him?

12 A. Umm, at the time of this investigation, he was a member
13 of the Los Angeles County Board of Supervisors.

14 Q. Were you the case agent on the investigation along with
15 other agents?

16 A. Yes.

17 Q. Was the defendant a supervisor with the Los Angeles
18 County Board of Supervisors from 2008 to 2020?

19 A. Yes, he was.

20 Q. Did the conduct in this case relate to 2017 and 2018?

21 A. Yes.

22 Q. How long has the defendant been a politician?

23 A. About 30 years.

24 Q. Was he first on the Los Angeles City Council?

25 A. Yes.

1 Q. Was that from 1991 to 2002?

2 A. Yes.

3 Q. What is the Los Angeles City Council?

4 A. It's the governing body that oversees the City of
5 Los Angeles. I believe it's a 15-member body.

6 Q. After his stint on the L.A. City Council, did he then
7 go to the California State Assembly?

8 A. Yes.

9 Q. Was that from 2002 to 2006?

10 A. Yes.

11 Q. What is the California State Assembly?

12 A. California State Assembly is the -- is a governing body
13 of -- at the legislative -- at the state level.

14 Q. And coincidentally, the issues in this case, was
15 Sebastian Ridley-Thomas a California State Assemblymember?

16 A. Yes, he was.

17 Q. So after the California State Assembly, did the
18 defendant then move on in 2006 to the California State
19 Senate?

20 A. Yes, he did.

21 Q. Was that from 2006 to 2008?

22 A. Yes.

23 Q. And what is the California State Senate?

24 A. California State Senate, again, is another -- half the
25 governing body of the State of California. I believe it's a

1 40-member board.

2 Q. And then in 2008, like you said, did the defendant go
3 on and become a member of the Los Angeles County Board of
4 Supervisors?

5 A. Yes, he did.

6 Q. By 2020, was he termed out?

7 A. Yes, he was.

8 Q. What does it mean to be termed out?

9 A. So the rules in L.A. County, if you are a member of the
10 Board of Supervisors, you can serve three terms. Each term
11 is a four-year term. So after those three terms, you're
12 termed out. You're no longer allowed to be on the Board of
13 Supervisors.

14 Q. As we got towards the end of his term in 2020, did the
15 defendant start campaigning for yet another elected office?

16 A. Yes, for L.A. City Council.

17 Q. Did he start campaigning in 2019?

18 A. Yeah, I believe around December of 2019.

19 Q. Did he win? Did he become a Los Angeles City
20 councilman?

21 A. Yes. In fact, he's currently a Los Angeles councilman.

22 Q. So in 2018, when the events in this case are all
23 happening, was that just prior to the defendant starting his
24 election campaign for the Los Angeles City Council?

25 A. Yes.

1 commissions." Do you see that?

2 A. Yes.

3 Q. Do the county departments include the Department of
4 Children and Family Services?

5 A. Yes.

6 Q. Is that DCFS?

7 A. Yes.

8 Q. Does that also include the Department of Mental Health,
9 DMH?

10 A. Yes.

11 Q. Does it also include the probation department?

12 A. Yes.

13 Q. Just so I'm clear, the Board of Supervisors has the
14 power to appoint those department heads?

15 A. Yes, they do.

16 Q. Power to fire those department heads?

17 A. Absolutely.

18 Q. Have you heard the term "the five kings and queens"?

19 A. Yes.

20 Q. What do you understand that to be a reference to?

21 A. It's a reference to the -- the five-member Board of
22 Supervisors.

23 Q. Based on your experience investigating public
24 corruption investigations within Los Angeles County and your
25 experience in this case, why do you understand that they're

1 referred to the five kings and queens?

2 A. Put simply, they are the most powerful elected public
3 officials in Los Angeles County.

4 Q. I'd like to talk with you now about the defendant's
5 time as a member of the Board of Supervisors. How many
6 terms exactly did he serve?

7 A. Three.

8 Q. And just again, how long is each term?

9 A. Four years each term, so 12 years total.

10 Q. So was he elected in 2008?

11 A. Yes.

12 Q. 2012?

13 A. Yes.

14 Q. And 2016?

15 A. Yes.

16 Q. You said that he was termed out at that end of that
17 2020 term that he was serving?

18 A. Yes.

19 Q. Are you aware of whether the defendant ever served as
20 the Chairman of the Board of Supervisors?

21 A. Yes, he did. It's a -- it's a rotating responsibility
22 on the board. The defendant served as chairman from
23 December of 2012 for a year until the following December of
24 2013, and again December 2016 through the following year
25 until December 2017.

1 Q. Was the defendant the Chairman of the Board of
2 Supervisors at any time during the events in this
3 investigation?

4 A. Yes, he was.

5 Q. Was that in 2017?

6 A. Yes.

7 Q. Agent Adkins, I'd like to talk with you about this
8 particular investigation, when it began. When did this
9 investigation of the defendant begin?

10 A. The summer of 2018.

11 Q. Was July -- was it July 17th, 2018 --

12 A. Yes.

13 Q. -- roughly?

14 A. Yes.

15 Q. What happened on July 17th, 2018?

16 A. Representatives from USC reached out to the United
17 States Attorney's Office wanting to provide them with some
18 information related to the defendant and the U.S. Attorney's
19 Office reached out to the FBI and I sat in that initial
20 meeting with the U.S. Attorney's Office.

21 Q. Was this a criminal referral?

22 A. Yes.

23 Q. Did you start an investigation either on that day or
24 shortly thereafter?

25 A. Yes.

1 Sebastian Ridley-Thomas was trying to get that faculty
2 position to launch immediately in January of 2018?

3 A. Yes.

4 Q. Did you see Sebastian Ridley-Thomas around the time
5 that he's got this deteriorating health trying to get a
6 Master's degree from USC?

7 A. A dual Master's, yes.

8 Q. Dual Master's, so two degrees?

9 A. Yes.

10 Q. Also, that paid professorship, the faculty position's a
11 paid professorship?

12 A. Yes.

13 Q. Did you also see emails where he was planning to become
14 the director of AACEP?

15 A. Yes.

16 Q. Did you also see emails and draft resumes where he's
17 going to become the chief strategist of AAVREP?

18 A. Yes.

19 Q. Is that the defendant's political action committee?

20 A. Yes.

21 Q. And as we talked about earlier, did you also see
22 resumes where he's founding an entire consulting company?

23 A. Millennial Advisors.

24 Q. Did you also see evidence that he was going to be a
25 media contributor at this time when his health is

1 demonstrative.

2 MS. DURIE: No objection.

3 THE COURT: All right.

4 MS. DOTSON: Let's publish Exhibit 782.

5 *(The exhibit was displayed on the screen.)*

6 BY MS. DOTSON:

7 Q. Now, Agent Adkins, what did you notice about the
8 pattern and frequency in this heat chart between the
9 defendant's cellphone and Marilyn Flynn's cellphone?

10 A. I noticed a significant uptick around the time frame
11 that we've been discussing in this investigation.

12 Q. Now, did the defendant and Marilyn Flynn -- had they
13 known each other since the time of the Blue Ribbon
14 Commission, you know, years earlier?

15 A. Yeah. I think that would be reflected at the beginning
16 of that heat chart, February and March of 2014.

17 Q. Was it starting in May of 2017 when you started to
18 notice the uptick in the personal cellphone to personal
19 cellphone communication?

20 A. Yes.

21 Q. What, if anything, did that indicate to you in your
22 investigation?

23 A. It told me something was going on. There was a need to
24 communicate between their personal cellphones so that's...

25 Q. Okay. Was this -- was May 2017 right when the

1 defendant started reaching out to Marilyn Flynn about
2 benefits for Sebastian Ridley-Thomas?

3 A. Yes.

4 Q. If you could now look at Exhibit 783. We're not going
5 to publish it yet.

6 A. *(Searching through documents.)*

7 Q. Is this a similar heat chart?

8 A. Yes. It's a heat chart showing the contacts between
9 the defendant's cellphone, Flynn -- Dean Flynn and DMH
10 Director John Sherin.

11 Q. Does it fair and accurately reflect what you obtained
12 from the toll records in this case?

13 A. Yes.

14 MS. DOTSON: Your Honor, move to publish
15 Exhibit 783 as a demonstrative only.

16 MS. DURIE: No objection.

17 THE COURT: You may.

18 *(The exhibit was displayed on the screen.)*

19 BY MS. DOTSON:

20 Q. Agent Adkins, what did you notice about the pattern and
21 frequency of communications between the defendant's
22 cellphone and Marilyn Flynn's cellphone and John Sherin's
23 cellphone?

24 A. Again, the pattern you can see is a drastic uptick. I
25 would note the first -- it appears the first contact between

1 Q. Do you know what an audit fee is?

2 A. I believe it's a fee that allows prospective students
3 to sit in on classes, but I'm not entirely sure about that.

4 Q. Okay. Did that soon change in terms of Marilyn Flynn's
5 efforts, as you saw them in all these emails, to provide
6 benefits to Sebastian Ridley-Thomas?

7 A. Yes.

8 MS. DOTSON: If we could publish Exhibit 9. Let's
9 go down to the bottom email and zoom in.

10 *(The exhibit was displayed on the screen.)*

11 BY MS. DOTSON:

12 Q. What is Exhibit 9, this bottom email?

13 A. This is an email from the defendant to Marilyn Flynn
14 and the subject is regarding Assemblymember
15 Sebastian Ridley-Thomas, next generation leader.

16 Q. Does he provide a link talking about the things
17 Sebastian Ridley-Thomas is doing?

18 A. Yes.

19 Q. Does he also say, "Thought you might be interested in
20 seeing this article. Looking forward to seeing you soon.
21 We're overdue for lunch. Lots to catch up on"?

22 A. Yes.

23 Q. Based on your review of their email communications,
24 were Mark Ridley-Thomas and Marilyn Flynn social friends?
25 Did they go to each other's houses and --

1 A. No.

2 Q. -- from anything you saw in the emails?

3 A. No.

4 Q. When they met, what did it appear, based on the
5 lobbying reports and alls the things that they talked about?

6 A. Business, L.A. County business, USC business,
7 Sebastian.

8 MS. DOTSON: Now, if we could zoom up and go to
9 the next email in the chain. Let's zoom in here.

10 *(The exhibit was displayed on the screen.)*

11 BY MS. DOTSON:

12 Q. So after the defendant sends Marilyn Flynn an email
13 saying: Here's some stuff my son's doing and let's meet,
14 lots to catch up on, does she respond?

15 A. Yes.

16 Q. Okay. Does she say: He will do very well here and I'm
17 glad he's interested in advancing his education. The joint
18 degree will suit him perfectly?

19 A. Yes.

20 Q. Did it appear to you at that point that they had
21 discussed a joint degree for Sebastian Ridley-Thomas?

22 A. Yes. This appears they had a conversation discussing
23 this topic.

24 Q. Now, as of May 26, 2017, had there been any joint
25 degree approved for Sebastian Ridley-Thomas?

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UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
WESTERN DIVISION

THE HONORABLE DALE S. FISCHER, JUDGE PRESIDING

UNITED STATES OF AMERICA,)
)
 Plaintiff,)
)
 vs.) NO. CR 21-485-DSF
)
 MARK RIDLEY-THOMAS,)
)
 Defendant.)
 _____)

REPORTER'S TRANSCRIPT OF PROCEEDINGS

Los Angeles, California

Thursday, March 16, 2023, 7:44 A.M.

Day 7 of Jury Trial, Page 1625 to 1776, Inclusive

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1 the emails you had seen that anyone other than Marilyn Flynn
2 at the USC School of Social Work was aware that the
3 defendant had donated a hundred thousand dollars, it was
4 going through the university and out to United Ways?

5 MS. DURIE: Objection. Lacks foundation.

6 THE COURT: Oh, overruled.

7 BY MS. DOTSON:

8 Q. Let me ask that again, Agent Adkins.

9 As of the date that USC is honoring the defendant
10 with this commencement address and honorary degree, had you
11 seen any evidence whatsoever that anyone at USC was aware
12 that the defendant had donated a hundred thousand dollars to
13 USC and that Marilyn Flynn, seven days later, was moving
14 that money out of the university to United Ways?

15 A. I believe the only other person that would've been
16 aware may have been Michele Clark.

17 Q. Michele Clark, the whistleblower in this case?

18 A. Yes.

19 MS. DURIE: I'm going to object as argumentative
20 and move to strike.

21 THE COURT: Sustained. That'll be stricken.

22 BY MS. DOTSON:

23 Q. Did Michele Clark report her suspicion she had with
24 this hundred-thousand-dollar transaction to John Clapp?

25 A. Yes, she did.

1 Q. What did John Clapp do when he heard from Michele Clark
2 this report?

3 A. He elevated it to higher levels within the university.

4 Q. So after this point in June and July 2018, is that when
5 that internal USC investigation began?

6 A. Yes.

7 Q. And did that then follow a criminal referral to the
8 U.S. Attorney's Office and the FBI?

9 A. Yes.

10 MS. DOTSON: Zoom back out.

11 *(The exhibit was displayed on the screen.)*

12 BY MS. DOTSON:

13 Q. Just so we're clear, Agent Adkins, in the bank records
14 in this case, did you see the wirings happen of the hundred
15 thousand dollars coming in and then the hundred thousand
16 dollars eventually going out?

17 A. Yes.

18 Q. Okay. Do they happen on the same date so USC receives
19 the May 2nd payment and it goes immediately out or does it
20 take a few days?

21 A. The wirings occur --

22 Q. A few days --

23 A. -- after the fact.

24 Q. A few days after?

25 A. Yes.

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UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
WESTERN DIVISION

THE HONORABLE DALE S. FISCHER, JUDGE PRESIDING

UNITED STATES OF AMERICA,)
)
 Plaintiff,)
)
 vs.) NO. CR 21-485-DSF
)
 MARK RIDLEY-THOMAS,)
)
 Defendant.)
 _____)

REPORTER'S TRANSCRIPT OF PROCEEDINGS

Los Angeles, California

Friday, March 17, 2023, 11:51 A.M.

Day 8 of Jury Trial, Page 2047 to 2117, Inclusive

WIL WILCOX, CSR 9178
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1 A. Well, we provide those, you know. So any employee of
2 ours, right, is -- is entitled to the same benefits of all
3 of our other employees. And so that comes out of funds that
4 the sponsor -- or sorry, that the project helps to raise.

5 Q. So the project is the one that provides the funds for
6 the health care?

7 A. Right.

8 Q. Is the same true for retirement benefits?

9 A. Yes.

10 Q. Now, is it fair to say that fiscal sponsorship is not
11 United Ways' primary purpose?

12 A. It's not. Yeah, that's fair.

13 Q. Now, for a sponsored project like you -- is it
14 important for United Ways to know the source of the
15 donation?

16 A. Yes.

17 Q. Why is that?

18 A. Well, so my organization works with the 30 United Ways
19 here in California. The thing about United ways is nobody
20 thinks we're separate. So if one United Way messes up in
21 one place, the whole country's going to hear about and think
22 United Way did something, right? So, you know, reputational
23 risk is important for us to -- to sort out, right? So we
24 don't want to be associated with something that's a
25 reputational risk. That's one key reason.

1 Also, you know, under the Patriot Act and other
2 laws, there are places that you legally can't accept money
3 from, right, so...

4 Q. In 2018, approximately how many employees did United
5 Ways have?

6 A. I think we had around 14. I'd have to go back and look
7 and see exactly how many. It was like 12 to 14.

8 Q. Was one of those employees Maryrose McMahon?

9 A. Yes. She was our executive coordinator.

10 Q. Do you know Mark Ridley-Thomas?

11 A. We've spoken on the phone. I don't think we've
12 actually met in person, but I know him by reputation as
13 well.

14 Q. Now, around January 2018, were you made aware of a
15 project associated with Mark Ridley-Thomas?

16 A. Yes.

17 Q. Was that project called the Policy Research & Practice
18 Initiative?

19 A. I don't know if I knew the name -- them by that name
20 yet, but it was a project focused on African American
21 politics and civic culture, I think.

22 Q. Fair enough.

23 At that time, do you recall who referred the
24 project to you?

25 A. Yes, Elise Buik. She's the CEO for United Way of

1 Greater Los Angeles.

2 Q. Do you know if Mark Ridley-Thomas had first approached
3 United Ways -- United Way of Greater Los Angeles concerning
4 the sponsored project?

5 A. Yes, I think so. I think that Elise thought it would
6 be a better fit if they worked with us because the project
7 was going to have a statewide scope and mission.

8 MR. RYBARCZYK: Let's publish Exhibit 404, which I
9 believe is in evidence.

10 *(Exhibit 404 received in evidence.)*

11 BY MR. RYBARCZYK:

12 Q. Take a look at this email, Mr. Manzo. Do you see it's
13 an email from you dated January 26th, 2018?

14 A. Uh-huh.

15 Q. And then you write here: "Attached is our template
16 form of fiscal sponsorship agreement."

17 A. Right.

18 Q. Is this about the time you heard about
19 Mark Ridley-Thomas being interested in bringing a sponsored
20 project to United Ways?

21 A. Yes, I think so.

22 Q. Now, after sending this email that we're looking at
23 right here, did you receive another email from Ms. Buik
24 shortly thereafter concerning the sponsor project?

25 A. Yeah. I think she sent me a response. She forwarded

1 me something.

2 MR. RYBARCZYK: Let's publish Exhibit 405, which
3 is in evidence. Okay. Go to the second page, please.

4 BY MR. RYBARCZYK:

5 Q. Do you see an email here, Mr. Manzo. Who's that email
6 from?

7 A. It says Mark Ridley-Thomas.

8 Q. And whose it to?

9 A. Elise Buik.

10 Q. Okay. It says here, "Evening Elise, Just a heads up on
11 the prospective project. Quite exciting. Looking forward
12 to our conversation in the morning. Thank you."

13 Do you see what date it was sent?

14 A. January 28.

15 Q. And what's -- is that a Sunday?

16 A. 2018, sorry.

17 Huh?

18 Q. Is that a Sunday?

19 A. Yes.

20 MR. RYBARCZYK: Okay. Let's go up to the top
21 email. It's Exhibit 405.

22 BY MR. RYBARCZYK:

23 Q. Now, was that email forwarded to you?

24 A. Yes. Elise -- it says forwarded, and she didn't put a
25 message, but yes.

1 Q. Is this about the time you learned the name of the
2 potential sponsored project?

3 A. Yes.

4 Q. And is that PRPI?

5 A. Uh-huh.

6 Q. Or the Policy Research & Practice Initiative?

7 A. Yes.

8 Q. And is it okay if I refer to it as PRPI?

9 A. Yeah, absolutely.

10 MR. RYBARCZYK: Now, let's go back to that email
11 from Ms. Buik -- I'm sorry, that email from
12 Mark Ridley-Thomas to Ms. Buik on page 2.

13 BY MR. RYBARCZYK:

14 Q. If you look at the "from" header information there, is
15 Sebastian Ridley-Thomas copied on this?

16 A. No.

17 Q. So at this time, did you know if
18 Sebastian Ridley-Thomas -- well, first let me back up.

19 Do you know if Mark Ridley-Thomas has a son named
20 Sebastian Ridley-Thomas?

21 A. Yes.

22 Q. Okay. Is Sebastian Ridley-Thomas copied on this email?

23 A. No.

24 Q. Okay. At this time, did you know
25 Sebastian Ridley-Thomas was associated with PRPI?

1 BY MR. RYBARCZYK:

2 Q. Is that four? Is that accurate? Okay.

3 Now, in the four emails that Mark Ridley-Thomas
4 sent you and his voice mail and during your conversation
5 with him on May 4th, did Mark Ridley-Thomas tell you that he
6 had just donated \$100,000 from his ballot committee, the
7 Mark Ridley-Thomas Committee For A Better L.A., to USC?

8 A. No.

9 Q. Now, in those same conversations and emails, did
10 Mark Ridley-Thomas tell you that shortly thereafter, he
11 directed USC to make 100,000-dollar donation to United Ways
12 for PRPI?

13 A. No.

14 MS. AMRAM: Objection. Lacks foundation, assumes
15 facts not in evidence.

16 THE COURT: Overruled.

17 THE WITNESS: No.

18 BY MR. RYBARCZYK:

19 Q. No, okay.

20 Given the importance of knowing the source of the
21 funds you just testified to, would you have at least wanted
22 to know the fact that the money that Mark Ridley-Thomas had
23 paid to USC the \$100,000 was from his ballot committee and
24 that USC had turned around and donated \$100,000 to PRPI?

25 A. It would've been good to know, yes.

1 wrote, it was like, okay, let's just take a pause. So
2 that's what we ended up doing.

3 Q. Now, in August 2018, did you tell
4 Sebastian Ridley-Thomas that you would have to
5 terminate Zaneta Smith if you did not receive
6 additional funds?

7 A. Yes. We were having conversations about -- they had
8 other funds available and so we were going to use those
9 other to keep Zaneta on, Ms. Smith on, and -- but those
10 funds will run out if we don't get additional funds. And we
11 were talking about, you know, his prospects for lining up
12 additional support.

13 Q. Did you -- shortly after this situation, however, did
14 PRPI move on from United Ways?

15 A. Yes.

16 Q. Now, in all your conversations with
17 Sebastian Ridley-Thomas, did he ever tell you that just
18 mere days before the 100,000-dollar payment to United Ways,
19 if Mark Ridley-Thomas' ballot committee had given a
20 100,000-dollar payment to USC?

21 A. No.

22 Q. Now, did -- in all the conversations you had and emails
23 you had with Mark Ridley-Thomas, did Mark Ridley-Thomas ever
24 tell you, in the days -- the mere days leading up to the --
25 to May 4th, 2018, his ballot committee had provided \$100,000

1 to USC?

2 A. No.

3 Q. Now, did Sebastian Ridley-Thomas ever tell you, in all
4 your conversations with him, if the 100,000-dollar payment
5 from USC to United Ways had been directed by his father,
6 Mark Ridley-Thomas?

7 MS. AMRAM: Objection. Foundation.

8 THE COURT: No. Overruled.

9 THE WITNESS: Can you repeat the question --

10 BY MR. RYBARCZYK:

11 Q. Sure.

12 A. -- real quick?

13 Q. In all your conversations with Sebastian Ridley-Thomas,
14 did he ever tell you that his father, Mark Ridley-Thomas,
15 had directed the 100,000-dollar payment from USC to United
16 Ways for PRPI?

17 THE COURT: That was not the question you asked.

18 THE WITNESS: Yeah, sorry.

19 MR. RYBARCZYK: Okay. Do you want to restate it?
20 Do you want to restate it again, Your Honor?

21 THE COURT: No. I want you to ask the question
22 that you asked, which is the question to which I overruled
23 the objection.

24 BY MR. RYBARCZYK:

25 Q. In all your convers- -- in all your conversations with

1 Sebastian Ridley-Thomas, did he ever tell you that the
2 100,000-dollar payment from USC to United Ways for PRPI was
3 directed by his father, Mark Ridley-Thomas?

4 A. No.

5 Q. Did Mark Ridley-Thom- -- in all the conversations
6 you had with Mark Ridley-Thomas, did he ever tell you
7 that the \$100,000 from USC that went to fund PRPI and
8 United Way -- via United Ways was directed by him?

9 MS. AMRAM: Objection.

10 THE WITNESS: No.

11 MS. AMRAM: Assumes facts and foundation.

12 THE COURT: Overruled.

13 THE WITNESS: No.

14 MR. RYBARCZYK: Nothing further, Your Honor.

15 THE COURT: Cross-examination?

16 MS. AMRAM: Your Honor, we have no questions.

17 THE WITNESS: May the witness be excused?

18 MS. AMRAM: Yes, he may.

19 THE COURT: Thank you very much, sir. You're
20 excused.

21 Does the government have any further witnesses?

22 MS. DOTSON: Your Honor, subject to the government
23 conferring with the Court regarding all the admitted
24 exhibits and all of the exhibits that we understand have
25 been admitted and conferring regarding the matter at

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UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
WESTERN DIVISION

THE HONORABLE DALE S. FISCHER, JUDGE PRESIDING

UNITED STATES OF AMERICA,)
)
 Plaintiff,)
)
 vs.) NO. CR 21-485-DSF
)
 MARK RIDLEY-THOMAS,)
)
 Defendant.) PARTIAL TRANSCRIPT
)

REPORTER'S TRANSCRIPT OF PROCEEDINGS

Los Angeles, California

Wednesday, March 22, 2023, 11:39 A.M.

Day 10 of Jury Trial

Pages 2591-2647 and 2653-2773, Inclusive

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1 I'll just note that for the record.

2 MS. AMRAM: And, Your Honor, they repeatedly asked
3 witnesses during the Defense case if it was a conflict of
4 interest. So they have brought at issue it's a conflict of
5 interest. And the jury shouldn't be confused as to whether
6 or not that's sufficient when the Supreme Court has said, in
7 black and white, a conflict of interest is not sufficient
8 for a federal crime. We are just asking for that simple
9 instruction.

10 MS. DOTSON: The Government is not arguing that
11 the basis of the 1346 is a conflict of interest versus a
12 bribe. The Government elicited that testimony, because the
13 Defense's case, beginning at opening, has been, Nothing to
14 see here; everybody would have done what Mark Ridley-Thomas
15 did; no problem.

16 And part of the Government's case is that things
17 are unusual. And the Defense put at issue so-called good
18 faith. When you are a fiduciary for the County of
19 Los Angeles and you are acting in ways that appear to be a
20 conflict of interest, that's at least some evidence of
21 things of this in this case to rebut that.

22 But the conflict of interest in *Skilling* would be
23 if we were saying that to prove 1346, all we had to show was
24 a conflict of interest. The Government's not arguing that,
25 will not argue that. The Government has the burden of

1 proving that bribery was the scheme for the 1346, and that's
2 what the Government will argue tomorrow.

3 MS. AMRAM: And we just ask the Court to read
4 Defense Proposed 39B. It is an accurate recitation of
5 *Skilling*. And we think the jury should be told that a
6 conflict of interest is not a federal crime.

7 THE COURT: All right. Go work on this. I mean,
8 stay here and work on it.

9 And Ms. Fisher will let me know when you have
10 accomplished something.

11 MS. AMRAM: Your Honor, can I ask you two quick
12 housekeeping questions?

13 THE COURT: Yes.

14 MS. AMRAM: Does the Court pre-instruct the jury,
15 or does the Court do instructions after closing?

16 THE COURT: Pre-instruct.

17 MS. AMRAM: Okay. And we will do closings
18 tomorrow, I'm guessing?

19 THE COURT: Because the jury will shoot me if I
20 bring them in for an hour of jury instructions.

21 MS. AMRAM: That's what I figured, but I just
22 wanted to check. Thank you.

23 (Recess.)

24 THE COURT: We've had some progress?

25 Good.

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UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
WESTERN DIVISION

THE HONORABLE DALE S. FISCHER, JUDGE PRESIDING

UNITED STATES OF AMERICA,)
)
 Plaintiff,)
)
 vs.) NO. CR 21-485-DSF
)
 MARK RIDLEY-THOMAS,)
)
 Defendant.)
 _____)

REPORTER'S TRANSCRIPT OF PROCEEDINGS

Los Angeles, California

Friday, March 24, 2023, 7:45 A.M.

Day 12 of Jury Trial, Page 2992 to 3068, Inclusive

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1 School of Social Work. And at the same time, he knows
2 that his son's application is essentially in front of
3 Dean Marilyn Flynn. In other words, she's told
4 Sebastian Ridley-Thomas: We're going to give you a free
5 ride.

6 But nothing's been finalized. And, in fact,
7 you'll see, at the end of the year, it had not been
8 finalized. So as he's voting in a way that benefits
9 Dean Marilyn Flynn, who is a contractor with the county, who
10 has business in front of the county, who wants things from
11 the county? Specifically, the Defendant.

12 He's just voting for this like no big deal.
13 Yeah, I know my son has an application. I know I've been
14 talking to Dean Marilyn Flynn, the dean of that school,
15 about him getting into that school. But I still feel
16 comfortable voting in a way that is financially beneficial
17 to that school as a result of a request specifically from
18 that dean.

19 That is called a conflict of interest.

20 Multiple witnesses were asked on cross-examination
21 if --

22 MS. DURIE: Your Honor, I object to that.

23 THE COURT: Ladies and gentlemen, you'll be the
24 judges of what the evidence shows.

25 MR. MORSE: Multiple witnesses testified in