

IN THE CIRCUIT COURT, SEVENTH
JUDICIAL CIRCUIT, IN AND FOR
ST. JOHNS COUNTY, FLORIDA

STEVEN RHODES,
Plaintiff,

vs.

CASE NO.: 2015-CA15-1383

JOSEPH BRYANT and
O [REDACTED] V [REDACTED]

Defendants.

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DEPOSITION OF

JOSEPH PRESTON BRYANT, JR.

TAKEN BY: Plaintiff

DATE: July 18, 2017

TIME: 8:42 a.m. - 10:49 a.m.

PLACE: Precise Reporting Services
820 A1A North, Suite W14
Ponte Vedra Beach, Florida 32082

REPORTED BY: Maia Randosh, Court Reporter
Notary Public, State of Florida

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CONDUCTED ON 7/18/2017

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2	<p>1 A P P E A R A N C E S</p> <p>2 APPEARANCE FOR THE PLAINTIFF</p> <p>3 BRYAN E. DEMAGGIO, ESQUIRE</p> <p>4 SHEPPARD, WHITE, KACHERGUS & DEMAGGIO, P.A.</p> <p>5 215 Washington Street</p> <p>6 Jacksonville, Florida 32202</p> <p>7 (904) 356-9661</p> <p>8 APPEARANCE FOR THE DEFENDANTS</p> <p>9 JULIE K. KURTZ, ESQUIRE</p> <p>10 CANAN LAW</p> <p>11 1030 North Ponce de Leon Boulevard</p> <p>12 St. Augustine, Florida 32084</p> <p>13 (904) 824-9402</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	4
3	<p>1 JOSEPH PRESTON BRYANT, JR.</p> <p>2 a witness herein, having been duly sworn, testified as</p> <p>3 follows:</p> <p>4 THE WITNESS: I do.</p> <p>5 DIRECT EXAMINATION</p> <p>6 BY MR. DeMAGGIO:</p> <p>7 Q Good morning, sir.</p> <p>8 A Good morning.</p> <p>9 Q My name is Brian DeMaggio. I represent</p> <p>10 Dr. Rhodes in his suit against you and Ms. O [REDACTED] I have</p> <p>11 trouble pronouncing her last name, so --</p> <p>12 A So do I.</p> <p>13 Q I believe it's Z [REDACTED] now, but the prior name</p> <p>14 was tough. If you could, please give your full name to</p> <p>15 the court reporter.</p> <p>16 A Joseph Preston Bryant, Junior.</p> <p>17 Q And what do you normally go by?</p> <p>18 A Joe.</p> <p>19 Q Joe Bryant?</p> <p>20 A Uh-huh.</p> <p>21 Q Okay. Where do you currently live?</p> <p>22 A In a condo on Mickler.</p> <p>23 Q What's the address?</p> <p>24 A 134 Hidden Palms Lane.</p> <p>25 Q Does that have a unit number?</p> <p>1 A No.</p> <p>2 Q And that's Ponte Vedra?</p> <p>3 A Correct. Ponte Vedra Beach.</p> <p>4 Q What's the ZIP over there?</p> <p>5 A 32082.</p> <p>6 Q What's your date of birth?</p> <p>7 A June 25th, 1947.</p> <p>8 Q Okay. So you're right at 70?</p> <p>9 A Just past it.</p> <p>10 Q Got you. Got you. And off the record, what's</p> <p>11 your social security number?</p> <p>12 (Discussion off the record.)</p> <p>13 BY MR. DeMAGGIO:</p> <p>14 Q How long have you been living at Hidden Palms</p> <p>15 Lane?</p> <p>16 A Since June of -- since June of last year.</p> <p>17 Q Do you own or rent?</p> <p>18 A Rent.</p> <p>19 Q Where did you live at prior to Hidden Palms</p> <p>20 Lane?</p> <p>21 A The address?</p> <p>22 Q Uh-huh.</p> <p>23 A 57 Thicket Creek Trail, Ponte Vedra, 32081.</p> <p>24 Q Was that a condo, or was that a home?</p> <p>25 A Home.</p>	5

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<p>6</p> <p>1 Q Did you own that one or rent that one?</p> <p>2 A Rented it.</p> <p>3 Q Okay. And I know I saw a -- what was it --</p> <p>4 136 Plantation Circle South. Did you ever live there?</p> <p>5 A Yes.</p> <p>6 Q Okay. When did you live at that address?</p> <p>7 A Let's --</p> <p>8 Q Let's do it this way. Has there been an</p> <p>9 address you lived at in between that and Cricket --</p> <p>10 A Thicket.</p> <p>11 Q -- Thicket Creek Trail?</p> <p>12 A No.</p> <p>13 Q Okay. So you lived at 136 Plantation South</p> <p>14 prior to moving to Thicket Creek Trail?</p> <p>15 A Uh-huh.</p> <p>16 Q Okay. How long did you live there?</p> <p>17 A Almost three years.</p> <p>18 Q Same question. Rent or own there?</p> <p>19 A Neither.</p> <p>20 Q Okay.</p> <p>21 A I was a home stager. Well, I guess -- I guess</p> <p>22 you could say I rent it.</p> <p>23 Q That was your rent, I guess, to stage the</p> <p>24 home? Were you staging it to sell other homes in the</p> <p>25 area?</p>	<p>8</p> <p>1 A General executive duties, oversee marketing</p> <p>2 and operations.</p> <p>3 Q And you guys are property appraisers or --</p> <p>4 A We're an appraisal management company.</p> <p>5 Q Okay. Well, tell me what that -- what you do</p> <p>6 there. Forgive my ignorance. I'm not in that game.</p> <p>7 A Thanks to the mortgage meltdown of 2008, the</p> <p>8 government -- the adage from the government, "We're here</p> <p>9 to help you," put in place the Home Valuation Code of</p> <p>10 Conduct in 2009, which instructed banks, credit unions,</p> <p>11 and mortgage bankers on the process in which they have</p> <p>12 to follow the law to handle appraisals on residential</p> <p>13 properties.</p> <p>14 Lenders can do it themselves. It costs money,</p> <p>15 and it has risk. They can outsource it to a third-party</p> <p>16 vendor like our company, and we manage the process.</p> <p>17 Q Okay. How long have you been the president of</p> <p>18 Triserv Appraisal Management?</p> <p>19 A Six years.</p> <p>20 Q Is that a corporation or --</p> <p>21 A It's an LLC.</p> <p>22 Q Okay.</p> <p>23 A Well, it's a DBA. It's Trident,</p> <p>24 T-r-i-d-e-n-t, Services, LLC, doing business as.</p> <p>25 Q Okay. And you're the president of the</p>
<p>7</p> <p>1 A No. To sell that house.</p> <p>2 Q Oh, okay. That was eventually sold to a Terri</p> <p>3 Krasienko or something like that?</p> <p>4 A Yes.</p> <p>5 Q Okay. So you never had any ownership interest</p> <p>6 in that house?</p> <p>7 A No.</p> <p>8 Q You were just there? Okay.</p> <p>9 And at one point, did you live at 128</p> <p>10 Middleton Place?</p> <p>11 A Correct.</p> <p>12 Q When did you live there?</p> <p>13 A Three and a half years before, I lived at</p> <p>14 Middleton Place.</p> <p>15 Q Okay.</p> <p>16 A And the same answer. I was a home stager.</p> <p>17 Q Yeah. My next question was going to be,</p> <p>18 what's your profession?</p> <p>19 A I am president of Triserv Appraisal Management</p> <p>20 Solutions.</p> <p>21 Q What is that?</p> <p>22 A An appraisal management company.</p> <p>23 Q And tell me what you do there.</p> <p>24 A I'm the president.</p> <p>25 Q What does the president do?</p>	<p>9</p> <p>1 corporation?</p> <p>2 A Uh-huh.</p> <p>3 Q Okay.</p> <p>4 A Yes.</p> <p>5 Q What is JP Bryant and Associates?</p> <p>6 A It is an LLC.</p> <p>7 Q And what is -- do you work there?</p> <p>8 A Up until this week, technically, I did. JP</p> <p>9 Bryant and Associates was a contractor to Trident</p> <p>10 Services and provided me as the president of the</p> <p>11 company.</p> <p>12 Q Okay. And you said "up until this week."</p> <p>13 What happened this week?</p> <p>14 A I became a W-2 employee of Trident.</p> <p>15 Q Okay. So you were getting a 1099 from Trident</p> <p>16 doing work there under the rubric of JP Bryant and</p> <p>17 Associates?</p> <p>18 A Uh-huh.</p> <p>19 Q Did JP Bryant and Associates -- did you guys</p> <p>20 do any other work there other than contract work for</p> <p>21 Trident Services?</p> <p>22 A No.</p> <p>23 Q Okay. And I noted the business address for JB</p> <p>24 Bryant is 134 Hidden Palms Lane; is that correct?</p> <p>25 A That's correct.</p>

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10	<p>1 Q And that's where you're living at now?</p> <p>2 A Correct.</p> <p>3 Q Okay. And do you rent from the Pelles?</p> <p>4 A The Pelles.</p> <p>5 Q Pelles.</p> <p>6 A Yeah.</p> <p>7 Q They own that place?</p> <p>8 A Uh-huh.</p> <p>9 Q Okay. And then I saw as well on the</p> <p>10 Department of State that the registered agent address is</p> <p>11 at the 136 Plantation Circle; is that correct?</p> <p>12 A I really don't know. It should have been</p> <p>13 changed, but obviously it wasn't.</p> <p>14 Q Okay. What are your plains for JB Bryant now</p> <p>15 that you're W-2 with Triserv?</p> <p>16 A I will keep it as an active LLC, but probably</p> <p>17 will not conduct any business.</p> <p>18 Q Okay. Are there any other sources of</p> <p>19 employment for you now currently?</p> <p>20 A No.</p> <p>21 Q What's your educational background?</p> <p>22 A BS.</p> <p>23 Q Where did you go?</p> <p>24 A Lipscomb University.</p> <p>25 Q And what's your BS in?</p>	12
11	<p>1 A Business management.</p> <p>2 Q What year did you get that?</p> <p>3 A '69.</p> <p>4 Q Do you hold any certifications or licensure</p> <p>5 from the State of Florida?</p> <p>6 A No.</p> <p>7 Q Did you ever live at an address, 136 Playpen?</p> <p>8 A No.</p> <p>9 Q Okay. Are you married?</p> <p>10 A No.</p> <p>11 Q Have you been?</p> <p>12 A Yes.</p> <p>13 Q What was the name of your former spouse?</p> <p>14 A The first one was Barbara --</p> <p>15 Q Okay.</p> <p>16 A -- Wilson Bryant.</p> <p>17 Q How long were you guys married?</p> <p>18 A Thirty-one years.</p> <p>19 Q And I don't mean to pry to that end. By</p> <p>20 "divorce," did she pass away or --</p> <p>21 A Divorce.</p> <p>22 Q Okay. When were you guys divorced?</p> <p>23 A November of 1999.</p> <p>24 Q Was that here in St. Johns County?</p> <p>25 A No. It was in Suffolk County, New York.</p>	13

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1 Q Okay. And we got a little off track there,
2 but you and Ms. Barbara Wilson Bryant divorced in '99 --
3 A '99.
4 Q -- up in Suffolk County, New York. And then
5 did you have a spouse after her?
6 A Correct. Deborah Lattuca, L-a-t-t-u-c-a,
7 Bryant. We got divorced in June of 2007 here in
8 St. Johns County.
9 Q Okay. How long were you-all married?
10 A Seven years.
11 Q Okay. Any other spouses other than those two?
12 A Two is enough.
13 Q Respectfully, I would agree with you.
14 Where you're living now in Hidden Palms,
15 anybody live there with you?
16 A No.
17 Q Was anybody living with you when you lived at
18 136 Plantation Circle South?
19 A No.
20 Q Okay. You ever been in a lawsuit prior to
21 this one?
22 A Yes.
23 Q How many?
24 A Well, that's why I'm hesitating.
25 Q Okay.

15

1 A The first one I can remember is when I left
2 Travelers. I sued Travelers Insurance for -- to fulfill
3 the contract I had. I won that.
4 Q Where was that case?
5 A Philadelphia.
6 Q So you sued Travelers for a breach of
7 contract, it sounds like?
8 A Uh-huh.
9 Q Okay. Did it go to trial, or did you settle
10 it?
11 A No. I settled it. Then I moved down here and
12 I -- I guess you would call it a law- -- I don't know if
13 it was a lawsuit or whatever -- bought the house. When
14 I moved down here, bought the house and totally
15 renovated it, and got sideways with the contractor that
16 did the driveway. And, you know, I had a firm quote.
17 They tried to charge me more. I refused to pay it. The
18 guy filed a lien. I don't guess that was -- you know,
19 that, technically, was not a lawsuit.
20 Q What was that name of the contractor?
21 A I think it was North Florida Pavers.
22 Q Okay.
23 A And honestly -- I mean, I think -- if -- there
24 might be another one or two, but I just don't remember
25 anything.

16

1 Q Okay.
2 A I take that back. My ex-wife and I twice went
3 to court.
4 MS. KURTZ: Well, let me ask you this. When
5 you're asking about prior lawsuits, do you want him
6 to include divorce or post divorce proceedings?
7 BY MR. DeMAGGIO:
8 Q I was going to -- yeah. Obviously, you were
9 involved in two divorces and I guess, technically, those
10 are lawsuits.
11 A Well, then there were further actions beyond
12 that, but -- in the -- as it relates to the marriage.
13 Q Well, as to going back and trying to change
14 alimony or something like that?
15 A Yeah. Child support and --
16 Q I don't care about that, Mr. Bryant.
17 A Okay.
18 Q I'm more just -- you know, lawsuits where you
19 were the plaintiff or a defendant outside of the marital
20 context.
21 A As I said, there might have been another one.
22 I can't remember.
23 Q Okay. Did you -- were you subject to a
24 bankruptcy proceeding in the Middle District of Florida
25 back in 2010?

17

1 A Uh-huh.
2 Q Okay. Tell me a little about that.
3 A Well, I went bankrupt.
4 Q Okay.
5 A How to explain this. I had -- when I moved
6 here, I did a lot of consulting, did several -- I call
7 them part-time gigs as CEO or COO of mortgage companies,
8 ended up putting together a very substantial deal,
9 raised a lot of money to buy two mortgage companies.
10 That was successful. I made a lot of money on that.
11 Did another deal. You got to be careful when you pick
12 an equity partner, and I got -- I just got screwed.
13 Q Okay.
14 A And I was on the hook personally, you know,
15 the State of Illinois employment tax, a whole bunch of
16 other stuff, and my only alternative was to declare
17 bankruptcy.
18 Q Did you take any legal action against the
19 equity partner that screwed you?
20 A The equity -- the principal of the equity
21 partner is in prison.
22 Q Okay. So good luck getting any money out of
23 him?
24 A Yeah. It was blood out of a -- whatever.
25 Q Fair enough. And as I was digging around, I

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18	<p>1 also came across a tax lien from 2016.</p> <p>2 A That's correct.</p> <p>3 Q Is that you?</p> <p>4 A Uh-huh.</p> <p>5 Q Okay. I thought it may be, once you gave me</p> <p>6 the address, but that's -- tell me what's going on</p> <p>7 there.</p> <p>8 A Well, when I went bankrupt, I had no money,</p> <p>9 minimal income. And through a miracle from God, I got a</p> <p>10 check in the mail one day on an investment that I had</p> <p>11 made for about \$185,000, and I got 5600 a month for,</p> <p>12 like, 12 months, and I didn't pay taxes on it.</p> <p>13 Q Okay.</p> <p>14 A And I filed a return, negotiated an agreement</p> <p>15 with the IRS, which I have paid faithfully.</p> <p>16 Q Okay. So you're in a repayment plan with</p> <p>17 them?</p> <p>18 A Yeah.</p> <p>19 Q Fair enough. We talked about Trident</p> <p>20 Services, LLC where you were president, and then also JP</p> <p>21 Bryant and Associates where, I think, you're also the</p> <p>22 president there; right?</p> <p>23 A Managing member.</p> <p>24 Q Managing member, because it's an LLC. Any</p> <p>25 other corporations or LLCs which you're a member of?</p>	20	<p>1 Q How was that?</p> <p>2 A At the bar at Ruth's Chris.</p> <p>3 Q Right around the corner here?</p> <p>4 A Uh-huh.</p> <p>5 Q Was it a planned meeting or something</p> <p>6 fortuitous where you ran into her there?</p> <p>7 A Very fortuitous.</p> <p>8 Q Okay. And take it from there. How did your,</p> <p>9 you know, relationship with her develop?</p> <p>10 A We became very close. As in all</p> <p>11 relationships, we had our ups and downstairs, and</p> <p>12 throughout it all, we've been dear friends.</p> <p>13 Q How would you characterize the relationship</p> <p>14 currently?</p> <p>15 A It's kind of undefinable. We're very close.</p> <p>16 We spend a lot of time together. No ideas or thoughts</p> <p>17 about getting married or anything of that nature.</p> <p>18 Q Well, I mean, I know you said it's</p> <p>19 undefinable, which means it's hard to put a label on it.</p> <p>20 I mean, is she your girlfriend? Your fiancée? I mean,</p> <p>21 you talk about get -- you see where I'm coming from?</p> <p>22 I'm just trying to figure it out.</p> <p>23 MS. KURTZ: I'm going to object and say as</p> <p>24 asked and answered. Is there some specific</p> <p>25 information you're looking for?</p>
19	<p>1 A No.</p> <p>2 Q Okay. Have you ever met Steven Rhodes before?</p> <p>3 A Never.</p> <p>4 Q Okay. How about Richard Bloom? Have you ever</p> <p>5 met him?</p> <p>6 A I might have met him once.</p> <p>7 Q And when you say "you might have," do you have</p> <p>8 any specific recollection of when that was or where it</p> <p>9 was?</p> <p>10 A No.</p> <p>11 Q Do you know who he is and what he does?</p> <p>12 A He is a chiropractor.</p> <p>13 Q Would he have told you that when you met him,</p> <p>14 or would you have learned about that through another</p> <p>15 source?</p> <p>16 A I learned about that through another source.</p> <p>17 Q Who is that source?</p> <p>18 A Dr. Blanton.</p> <p>19 Q And I know Ms. Blanton says she knows you.</p> <p>20 You know her, Dr. Blanton?</p> <p>21 A Yes.</p> <p>22 Q How long have you known Dr. Blanton?</p> <p>23 A Almost -- it will be ten years in December.</p> <p>24 Q Do you remember how you first met her?</p> <p>25 A Yes.</p>	21	<p>1 MR. DeMAGGIO: I'm just trying to find out</p> <p>2 more about the relationship as it currently stands.</p> <p>3 A As the two of us describe it to everyone,</p> <p>4 we're dear friends, more than a friendship, but less</p> <p>5 than being madly in love.</p> <p>6 BY MR. DeMAGGIO:</p> <p>7 Q Okay. And how long has that been the state of</p> <p>8 the relationship with her? I know you said you've known</p> <p>9 her ten years.</p> <p>10 A Probably at least two, three years. I mean, I</p> <p>11 have no clue.</p> <p>12 Q Got you. After you met her back, roughly, ten</p> <p>13 years ago at the Ruth's Chris bar, did you guys start</p> <p>14 out as friends, or did you start dating after that?</p> <p>15 A Started dating immediately.</p> <p>16 Q Okay. And how long did you guys -- let me ask</p> <p>17 you this. Did there ever come a period where you broke</p> <p>18 up?</p> <p>19 A Yes.</p> <p>20 Q Okay. How long did you date until you broke</p> <p>21 up?</p> <p>22 A I have no clue.</p> <p>23 Q Okay. Do you know when you broke up?</p> <p>24 A I have no clue.</p> <p>25 Q There was a point in time where she dated</p>

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<p style="text-align: right;">22</p> <p>1 Dr. Rhodes; right?</p> <p>2 A Yes.</p> <p>3 Q Okay. Were you guys still dating then, or</p> <p>4 were you broken up at that point?</p> <p>5 A No. I guess you would say we were -- have</p> <p>6 broken up, but we still talked a good bit, saw each</p> <p>7 other occasionally.</p> <p>8 Q Okay. And I know Dr. Blanton told me that she</p> <p>9 had worked, I guess, for, like, a weight loss center</p> <p>10 somewhere for a little while. Do you know anything</p> <p>11 about that?</p> <p>12 A Uh-huh.</p> <p>13 Q Yes?</p> <p>14 A Yes.</p> <p>15 Q Okay. And then at some point, she came to</p> <p>16 share office space with Dr. Rhodes' office?</p> <p>17 A That's my understanding, yes.</p> <p>18 Q Okay. Well, when she was doing that, what was</p> <p>19 the nature of your relationship then?</p> <p>20 A Same answer I said before. We were good</p> <p>21 friends. We talked occasionally, but we didn't see each</p> <p>22 other.</p> <p>23 Q Okay. When's the last time you spoke to her?</p> <p>24 A Yesterday.</p> <p>25 Q Okay. How did it make you feel when she was</p>	<p style="text-align: right;">24</p> <p>1 met her at some little restaurant up on -- in Jax Beach.</p> <p>2 The purse was not in the car. And it was right after</p> <p>3 that that I found out that she had been dating Steve</p> <p>4 here.</p> <p>5 Q Who was the friend you were with that night?</p> <p>6 A April Daley.</p> <p>7 Q So you, Ms. Bryant, and Ms. Daley were having</p> <p>8 dinner somewhere other than this restaurant in Jax</p> <p>9 Beach?</p> <p>10 A Yeah. We were having dinner at Aqua Grill.</p> <p>11 Q Okay. And you said Ms. Bryant lied to you</p> <p>12 about something. What was that?</p> <p>13 A I think her name's Dr. Blanton.</p> <p>14 Q Okay. Dr. Blanton. I'm sorry.</p> <p>15 A Yeah.</p> <p>16 Q What did she lie to you about?</p> <p>17 A She said she had to go home early to take care</p> <p>18 of her son Daniel and give him dinner. She left. April</p> <p>19 discovered she did not have her purse, thought she had</p> <p>20 left it in Dr. Blanton's car. We called Deb on her cell</p> <p>21 phone, didn't answer, called her home phone, no one was</p> <p>22 there. I called Daniel and spoke with him and found out</p> <p>23 he was with his father in Orlando.</p> <p>24 Q Okay. And from that, how did that lead you to</p> <p>25 discover that she was --</p>
<p style="text-align: right;">23</p> <p>1 dating Dr. Rhodes?</p> <p>2 MS. KURTZ: Object to the form.</p> <p>3 BY MR. DeMAGGIO:</p> <p>4 Q You can answer.</p> <p>5 A Why do I have to answer?</p> <p>6 Q Because it's your deposition, and it can lead</p> <p>7 to relevant information.</p> <p>8 A What if I don't want to answer?</p> <p>9 Q Then I can file a motion with the Court, and</p> <p>10 we can take it up in front of the judge.</p> <p>11 A I'm just sparring with you. I didn't know she</p> <p>12 was dating Rhodes until one night, and I found out about</p> <p>13 it then.</p> <p>14 Q Do you remember roughly when that was?</p> <p>15 A I have no clue.</p> <p>16 Q Was that the night she got the DUI?</p> <p>17 A No.</p> <p>18 Q Was it prior to the night she got the DUI?</p> <p>19 A Yes.</p> <p>20 Q Okay. How did you find out about it?</p> <p>21 A She had dinner with myself and another friend.</p> <p>22 And in the course of the meeting, she told us something</p> <p>23 that turned out to be a lie. And the other friend</p> <p>24 thought she had left her purse in Dr. Blanton's car, so</p> <p>25 we were trying to find her, and ultimately found her,</p>	<p style="text-align: right;">25</p> <p>1 A Well, she -- she told us.</p> <p>2 Q Oh, you asked her, "What's up," and she</p> <p>3 said --</p> <p>4 A Well, we met, and I was upset with her because</p> <p>5 I don't like people to lie. And April talked to her</p> <p>6 and, I think, Deb said that she had been with Steve, and</p> <p>7 that's how I found out about it.</p> <p>8 Q Got you. So April confronted her about it and</p> <p>9 then she --</p> <p>10 A No. She didn't -- I would not use the word</p> <p>11 "confronted." She was talking to Deb, trying to find</p> <p>12 her purse, and asked her, "What the heck's going on?"</p> <p>13 Why did you lie to us?"</p> <p>14 "Well, I didn't want to tell you I was on a</p> <p>15 date with --"</p> <p>16 Q So she -- I'm going to use this term, and I</p> <p>17 don't mean to imply that she's in some elaborate</p> <p>18 cover-up, but she came clean to April, and then April</p> <p>19 relayed that to you?</p> <p>20 A Right.</p> <p>21 Q Okay. And then after you found out, that she</p> <p>22 was -- had been dating Dr. Rhodes, did you stay in</p> <p>23 contact with her at all after that?</p> <p>24 A Some --</p> <p>25 Q Some contact?</p>

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1 A -- but minimal.
2 Q Would that typically be, you know, telephone
3 contact, or would you ever have dinner together or --
4 A I mean, I really can't remember. We would
5 text, and once in a while, I talked to her.
6 Q Okay. Back then was your phone number
7 (904) 371-0870?
8 A That's correct.
9 Q Who was your service provider back then?
10 A Sprint.
11 Q You still have that number?
12 A Correct.
13 Q And then I think you're aware at some point,
14 Ms. Bryant got stopped for driving under the
15 influence -- or Dr. Blanton -- I don't know why I keep
16 saying "Ms. Bryant." I'm sorry -- Dr. Blanton got
17 stopped for driving under the influence?
18 A Yes.
19 Q And from reading the report, I understand that
20 you were at the scene?
21 A Yeah. I followed -- let me just tell the
22 story.
23 Q Yeah. That's what I'm trying to find out
24 about it. Yeah.
25 A So I think this was -- well, it had to be

27

1 October, and I guess it was '13. Is that when it was?
2 Q Yeah, I believe so.
3 A Okay. I get a phone call from Dr. Blanton.
4 She's very upset, asked me to meet her.
5 I met her at the Eleven South restaurant, and
6 her exact words were, she was -- well, paraphrasing, I
7 can't say her exact words but, you know, she was in this
8 relationship with Rhodes. It was a fiasco. He was
9 pressing her, yada, yada, yada. She wanted to get out
10 of it. And she was going to go talk to him that
11 afternoon or night to tell him that, you know, she
12 didn't want the cheese. She wanted out of the trap.
13 Q Okay.
14 A And then --
15 Q Let me stop you real fast. What time do you
16 reckon that phone call was?
17 MS. KURTZ: He said it was a meeting.
18 THE WITNESS: Huh?
19 MS. KURTZ: Did you say this was an in-person,
20 meeting or --
21 THE WITNESS: Yeah.
22 MS. KURTZ: Right.
23 A Well, she called me and asked me to meet her.
24 BY MR. DeMAGGIO:
25 Q She called to set it up?

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1 A It was obviously sometime in -- you know,
2 earlier in the day.
3 Q Okay. And then you guys met at where?
4 A Eleven South.
5 Q Okay. Is that a restaurant down here?
6 A Yes.
7 Q Where -- do you know where that is down here?
8 Help me out. I'm from Jacksonville. I don't come down
9 here a lot.
10 A It's on Eleven South. It's a street, you
11 know, and the name of the restaurant is Eleven South.
12 Q Is that --
13 A It's in Jacksonville Beach.
14 Q Okay.
15 A Very popular place.
16 Q I'm just a simple country boy from
17 Jacksonville. I don't come to the beach that much,
18 so -- so you guys met at Eleven South. Do you recollect
19 about what time you met there?
20 A I have no idea. 3:00 -- 3:00 to 4:00,
21 somewhere in there. Probably a little bit -- probably
22 closer to 4:00, is my guess.
23 Q Okay. Eat?
24 A Yeah. We had an appetizer, and I think we
25 drank one or two glasses of wine. She might have had a

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1 drink. I don't remember. And then she was very upset.
2 Deb can be a little bit emotional, and she doesn't like
3 confrontation. And she dreaded going and seeing this
4 guy to -- that would obviously, probably, be a
5 confrontation. She left. I wished her well. I went
6 home.
7 Q What time do you think she left?
8 A I have no clue. 5:30, 6:00.
9 Q Okay.
10 A Just a guess. I went home. And at what -- I
11 lose track of time. I call her, no answer, because I
12 want to see how she's doing, how it went. I get no
13 answer. I get -- for whatever reason, I got worried.
14 And she had initially -- well, initially she
15 told me she was going to the office, which is somewhere
16 down there in Jax Beach. I know where the building is.
17 I don't know the address. I actually drove to that
18 building, drove up into the parking garage to see if I
19 saw her car.
20 I drove around Jax Beach just thinking, maybe
21 they went here or went there, or whatever. I'm on my
22 way home, and I see -- it turns out to be a Jacksonville
23 police car following a blue BMW.
24 Q Okay.
25 A And they were in the outside lane. I was in

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1 the inside lane. And normally -- in normal
2 circumstances, I would just blow by that, but I don't
3 know why. I felt like there's something going on here,
4 and I'm just going to watch and see what happens.
5 And we drove for -- you know, I don't know.
6 It seemed like quite a while or quite a distance. And
7 then finally in the -- the BMW drove perfectly. And I
8 didn't -- at that time -- it was Dr. Deb, but I didn't
9 know at that time it was her.
10 Then the cop turns on his red lights, and I'm
11 thinking, "Well, this is weird. What's going on?" And
12 maybe -- I don't know -- a quarter mile, a half a mile,
13 she turned into -- what is it -- yeah. It's Outback
14 restaurant there in the shopping center near Butler.
15 Q Right near JTB. Okay.
16 A Yeah. And so there was Deb in her car here,
17 the first car, the cop, and then me. And I was just
18 going to go on. And as she turned in, she has a
19 "Florida State Mom" sticker in the bottom right-hand of
20 her rear window, and I said, "Holy crap. This is Deb."
21 Q Oh, you couldn't see that when you were
22 following --
23 A I had no clue it was her until she turned into
24 Outback. And then I pulled in, and candidly pulled up
25 beside her, got her to roll her window down, and I said,

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1 "If you've been drinking, do not blow."
2 And then I pulled around and, you know, they
3 got her out of the car. And I didn't know it, but she
4 had blown. I called an attorney that I knew and got him
5 on the phone and said, "We got a problem." And that's
6 the story of how that all happened.
7 Q So to paraphrase, the way you came on her is,
8 you were looking for her in the Jax Beach area, and as
9 you were heading back home --
10 A Uh-huh.
11 Q -- you saw a car, and it happened to be her
12 and you ended up in the parking lot?
13 A Exactly.
14 Q Okay. Did that lawyer that you called end up
15 representing her?
16 A Yes.
17 Q Okay. Who was that?
18 A Malcolm Anthony.
19 Q Have you yourself ever been arrested?
20 A Yes.
21 Q When and where?
22 A 1977 in Nashville, Tennessee.
23 Q What for?
24 A Mail fraud.
25 Q Was that a state charge or a federal charge?

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1 A Federal. And let me just add, it was a "made
2 for TV show." I got screwed.
3 Q Okay.
4 A I was between the U.S. attorney, the FBI, and
5 a guy that I had done some work for that they wanted,
6 and they wanted me to testify. I couldn't testify to
7 something that I knew was not true, and they put me in a
8 vice. I had no money, pled guilty, one count of mail
9 fraud.
10 Q Did you get time or probation or what
11 happened?
12 A Twelve months of probation, no fine.
13 Q Nashville is in the -- is it the Middle
14 District of Tennessee?
15 A Middle District.
16 Q Yeah. So are you a convicted felon?
17 A I think that's what they call it.
18 Q Okay.
19 A I did have my civil rights restored when I
20 lived in New York.
21 Q So now that you've got them restored, you can
22 vote?
23 A Yes.
24 Q Okay. Do you have your gun rights restored?
25 A No.

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1 Q Thought about doing that?
2 A No.
3 Q Other than the 1977 mail fraud charge up in
4 Nashville, any other arrests?
5 A No.
6 Q Okay. Do you know Tammy Wilson?
7 A Well, I don't -- I assume that's Tammy who
8 worked for Rhodes.
9 Q That's the one I'm referring to, yes.
10 A Yeah.
11 Q Have you ever met her?
12 A I don't recall meeting her.
13 Q Okay. How do you know about her then?
14 A Through conversations I had with Dr. Blanton.
15 And I talked to Tammy on the phone a couple of times,
16 and we traded some emails, as I remember.
17 Q Do you remember when that was, what time
18 period?
19 A I'm guessing it was sometime in 2014.
20 Q Can you ballpark for me? Was it, you know,
21 the early part, middle part of '14, Christmastime '14?
22 You don't know? Okay.
23 A One thing about being 70 is that maybe your
24 memory is not as clear as it used to be.
25 Q I work with a 76-year-old, so I get where

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1 you're coming from.
2 What email address would you have emailed her
3 at? Would it be this Jbryant@Triservellc.com?
4 A It would have probably been Joe@jpbryant.com.
5 Q Were there any other email addresses you used
6 back in 2014 that --
7 A No.
8 Q Okay. And as far as what you guys traded by
9 email, do you remember what she sent you or what you
10 sent her?
11 A In the -- only in the most general terms.
12 Q What would that be?
13 A Talking about misdeeds that apparently took
14 place by your client.
15 Q Alleged misdeeds by Dr. Rhodes?
16 A Yes.
17 Q How did it come to be that Ms. Wilson, who you
18 hadn't met, got your email address?
19 A I would assume Dr. Deb gave it to her, or it
20 could have been that Deb asked me -- you know, gave me
21 Tammy's email. I don't -- you know, talked to her, I
22 think, a couple of times and maybe a couple of emails at
23 best.
24 Q Was this email trading with Ms. Wilson before
25 or after you filed the tip with the insurance fraud

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1 folks?
2 A I don't know.
3 Q And this one's probably really going to tax
4 your memory. Do you have any recollection at all what
5 Ms. Wilson's email was at the time?
6 A I have no clue.
7 Q Okay. Who is your -- when you got
8 Joe@jpbryant.com, who is that email through?
9 A Network Solutions.
10 Q You ever exchange any text messages with
11 Ms. Wilson?
12 A I'm pretty sure, no.
13 Q Okay. Did Ms. Wilson ever send you any
14 documents related to Mr. -- or Dr. Rhodes' practice?
15 A No.
16 Q Okay. Just text, emails where she's writing
17 you stuff?
18 A Yes.
19 Q Okay. So no attachments to any of those
20 emails?
21 A No.
22 Q Okay. Did you maintain those emails?
23 A No.
24 Q Do you think you could track them down?
25 A I have no clue.

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1 Q Other than the possible one telephone call
2 with Ms. Wilson and the emails that you traded sometime
3 in 2014, have you had any other communication with her?
4 A Not that I can recall.
5 Q Okay. O V now named O
6 Z- and I'll get you the spellings when we go on a
7 break -- do you know her?
8 A No.
9 Q Have you ever met her?
10 A No.
11 Q Have you ever heard of her prior to this
12 lawsuit where she's listed as one of the defendants?
13 A Yes.
14 Q When did you first hear about her?
15 A I would say late -- well, sometime around
16 two-thousand -- late -- fourth quarter of 2013.
17 Q Okay. And how did you hear about her?
18 A She was referred to as someone that Rhodes had
19 done work on that was minimal. They charged the
20 insurance company like 56- or \$60,000 on.
21 Q Who did you hear that information from?
22 A I believe, Dr. Blanton.
23 Q Did Dr. Blanton tell you how she found out
24 about this information?
25 A Yes.

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1 Q What did she say?
2 A She said several people in the office had been
3 telling her about billing practices that were against
4 what they felt was right, and one specific one was this
5 egregious 56,000 for a couple of hours of work. And I
6 say 56-. I don't know what the exact -- that number
7 sticks with me for some reason. It might have been
8 60,000, you know.
9 Q Have you ever seen O bills?
10 A No.
11 Q Have you ever seen her medical records?
12 A No.
13 Q You have no idea what went on at the office as
14 it relates to her personally, do you?
15 A No.
16 Q Okay. Did -- when Ms. Blanton said there were
17 several in the office who had remarked about that, did
18 she say who in the office?
19 A Yeah. She said -- you know, she was old
20 enough to be everyone's mother there, and she became the
21 "mother confessor." The morale in the office was not
22 very good because most people didn't like or respect
23 this guy, and Tammy -- and there was at least two others
24 that talked to Deb a lot, and, you know, Deb shared that
25 information with me.

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1 Q Was one of the others a Melissa "Missie" Ross?
2 A Yeah. Missie something.
3 Q Okay. Do you need to take that? We can take
4 a break.
5 A No.
6 Q Okay.
7 A I apologize for looking at it.
8 Q Now, when she says that she was the "mother
9 confessor," were these in-person conversations that
10 Ms. -- or Dr. Blanton had with these folks about what
11 they saw at the office, or was this done by a phone
12 call, a text? Do you know?
13 A I inferred that it was personal contact.
14 Q Did you ever see any text messages that either
15 of these ladies, either Ms. Wilson or Ms. Ross, sent to
16 Dr. Blanton about what was going on at the office?
17 A I don't recall.
18 Q You said you never met O[REDACTED]. Have you ever
19 spoken to her?
20 A No.
21 Q Have you ever traded emails with her?
22 A Yes.
23 Q When was that?
24 A I don't know. Sometime in the last year, year
25 and a half.

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1 Q Since the lawsuit's been filed?
2 A Correct.
3 Q Okay. What email address would you have sent
4 that email?
5 A I have no idea.
6 Q Okay. Well, would it have possibly been the
7 JP --
8 A I have no idea.
9 Q Okay. What email addresses have you used in
10 the past year?
11 A The two that I have given you. For full
12 disclosure, I do have another email. I never use it.
13 Q Okay.
14 A It's what I use for when people want you to
15 give an email address that you think you might get junk.
16 Q Okay. So it wouldn't have been that one that
17 you sent to O[REDACTED]
18 A No. So JPBryant or Triserve are the only two
19 emails that I use.
20 Q Okay. The Triserve email, is that from the
21 same Network Solutions? Do you use them for that as
22 well?
23 A No. It's Google.
24 Q Google? Okay. And the emails you sent back
25 and forth with Ms. O[REDACTED], what do those concern?

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1 A The -- that I had gotten information from my
2 attorney that a suit had been filed against her. And at
3 that time, it was my understanding she did not have an
4 idea that that had occurred. She had not yet been
5 served. And I introduced myself by email and said that
6 I had retained counsel, Ms. Kurtz, and that I'd be happy
7 to introduce her if she felt she was in need of an
8 attorney.
9 Q Did you agree to pay her legal fees?
10 A Of course not.
11 Q Okay. How did you -- I guess, how did you
12 know that she didn't have counsel or that she hadn't
13 been served yet? How did you find out about that?
14 A As I -- I believe, it was either a phone call
15 or an email with Ms. Kurtz that an additional suit had
16 been filed.
17 Q Okay. And I don't want to know about any
18 conversations you had with your attorney. I just, you
19 know --
20 A Yeah.
21 Q Okay. Other than that email about, "Suit's
22 been filed. I've retained Ms. Kurtz. I can introduce
23 you if you want," any other contact you've had with
24 Ms. O[REDACTED]?
25 A I don't believe there was anything else.

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1 Q Fair enough. Melissa Ross, or Missie Ross, we
2 had mentioned her earlier. Have you met her before?
3 A I don't believe I have.
4 Q Do you know who she is?
5 A All I know is that she is somebody that used
6 to work for Rhodes.
7 Q Do you know what she did there?
8 A It would be a guess. I think she was some
9 type of masseuse.
10 Q Okay. Have you seen her deposition?
11 A No.
12 Q And the fact that she used to work for Rhodes,
13 would you have learned that from Dr. Blanton as well?
14 A Correct.
15 Q Okay. Similar question as I asked you as it
16 related to Ms. Wilson and O[REDACTED]. Any email contact that
17 you've had with Ms. Ross?
18 A I don't believe I have.
19 Q Okay. Any phone contact?
20 A I have no recollection of email, text, phone
21 calls, Pony Express, or anything with Missie Ross.
22 Q Okay. No smoke signals or anything?
23 A No.
24 Q Okay. So basically your knowledge as it
25 relates to her is that she's somebody that worked for

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1 Rhodes, and you learned that from Dr. Blanton?

2 A Correct.

3 Q Okay. I know Dr. Blanton didn't work for

4 Dr. Rhodes, but she shared space with him. So other

5 than her sharing that space and working in that office,

6 Ms. Ross, or Ms. Wilson, are you aware of any other

7 people that worked in the office with Dr. Rhodes?

8 A I heard names, but I couldn't tell you

9 anybody's name.

10 Q Okay. Have you ever corresponded with any of

11 them?

12 A Other than --

13 Q O [REDACTED]

14 A And Tammy?

15 Q Right.

16 A No.

17 Q Okay.

18 A Not to my knowledge. I can't remember.

19 Q Have you ever met or had any conversations

20 with any patients or former patients of Dr. Rhodes,

21 other than O [REDACTED]

22 A Can I ask my attorney a question?

23 Q Sure. You want to take a break?

24 A No, that's okay.

25 (Witness conferring with counsel.)

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1 BY MR. DeMAGGIO:

2 Q Okay. Have you met any patients or former

3 patients of Dr. Rhodes?

4 A I'm sure I have.

5 Q Okay. But not specifically by name?

6 A No.

7 Q Okay. So have you ever met a guy named H [REDACTED]

8 C [REDACTED]

9 A If I have, I don't remember that.

10 Q Okay. How about a B [REDACTED] L [REDACTED]?

11 A Not to my knowledge.

12 Q A [REDACTED] N [REDACTED]?

13 A A [REDACTED], no.

14 Q M [REDACTED] S [REDACTED]?

15 A No.

16 Q Or a H [REDACTED] S [REDACTED]?

17 A Not to my knowledge.

18 Q All right. The guy with the last name

19 G [REDACTED], G [REDACTED]?

20 A Not to my knowledge.

21 Q Okay. And how about a D [REDACTED] B [REDACTED]?

22 A Not to my knowledge.

23 Q All right. Have you ever met an attorney

24 named Mike Ossi?

25 A Not to my knowledge.

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1 Q And there were a couple detectives from the

2 Department of Insurance Fraud that investigated this

3 thing, a Detective Murphy. Did you ever meet him?

4 A I met two detectives, Paul Robbins, and the

5 second one, I can't remember the name of.

6 Q The only two that I know that worked this

7 thing up were Robbins and a guy named Murphy.

8 A Well, I guess it will --

9 Q Do you remember what Robbins and the other guy

10 looked like? Maybe we can differentiate that way.

11 A Not really.

12 Q Okay.

13 A I just -- I met them once face-to-face.

14 Q When and where was that, if you can recall?

15 A Oh, man. I guess this was sometime in 2014,

16 maybe the first quarter, late first quarter. They came

17 to my house.

18 Q Was that at Plantation Circle South?

19 A 136 Plantation Circle South.

20 Q Did they call before they came, or did they

21 just show up?

22 A They called.

23 Q What do you remember about that phone call?

24 A That they were very excited to talk to

25 somebody about your client, because they had him under

45

1 investigation.

2 Q They said that?

3 A Exact words.

4 Q Anything else on that phone call?

5 A Excuse me. On the phone call, no.

6 Q Did they say how long they had him under

7 investigation?

8 A Not that I can remember.

9 Q Okay. I'm assuming they also said, "We'd like

10 to come by and talk to you. Where do you live or what

11 time is convenient," something like that?

12 A Exactly.

13 Q Okay. So they came over to your house, just

14 those two?

15 A Yes.

16 Q And do you remember what time of day it might

17 have been?

18 A Seems like it was mid- -- 3:00 or 4:00.

19 Q Was this before or after you submitted the tip

20 to the --

21 A It was after. The phone call was a result of

22 that.

23 Q Okay. Okay. And I'll go over the tip here in

24 a little bit. I'm just trying to keep it timeline. So

25 they came over about 3:00 or 4:00 p.m. Where did you

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1 guys meet?

2 A My house.

3 Q How long were they there?

4 A I can't remember.

5 Q What did you guys talk about? What did they

6 ask you? What did you tell them?

7 A They asked me what I knew about the allegation

8 that I had -- or allegations that I had made in the tip

9 to the FDLE, and I shared with them that it was, you

10 know, based on information that I had heard from

11 Dr. Blanton, and after a chance -- meeting with a friend

12 of mine in the health insurance business who recommended

13 that I -- not recommended. He said, "You have an

14 obligation to report anything that you feel might be

15 misdeeds on behalf of this guy."

16 Q When you were being given this information by

17 Dr. Blanton concerning Dr. Rhodes about what she was

18 hearing from the folks at the office, did you ever ask

19 her, "Why don't you report that to somebody?"

20 A Yes. And she said she's very

21 nonconfrontational, and she was -- and there's -- I lose

22 track of the time. She was trying to extricate herself

23 from the relationship and from the office with Rhodes.

24 She and I both had several conversations with a personal

25 friend and attorney of Rhodes about how to help manage

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1 that and get her out of there.

2 She was afraid. She felt like he would be

3 vindictive and, you know, again the old joke, she didn't

4 want the cheese. She wanted out of the trap.

5 Q Who was the personal friend that you guys

6 spoke to?

7 A David Willis.

8 Q He's got -- I think he's got an office in the

9 building where Rhodes' office is; right?

10 A I have no clue.

11 Q Okay. Did there come some tension about

12 Dr. Rhodes starting to charge Dr. Blanton rent to use

13 their office -- or use his office?

14 A Not that I'm aware of.

15 Q Okay.

16 A I believe that statement, if -- well, never

17 mind. Scratch.

18 Q Go ahead. What do you believe?

19 A No.

20 Q I'm asking you, what do you believe?

21 A I believe that, you know, that's total BS. He

22 never would have charged her rent and never asked her

23 for rent.

24 Q Okay. Did Dr. Blanton, in any of her

25 conversations with you, ever express to you that either

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1 of these ladies at the office that were having problems

2 with the building procedures, did they ever go talk to

3 Dr. Rhodes about it?

4 A Not that I'm aware of.

5 Q Okay. And who is the friend in the health

6 insurance business that you were referencing?

7 A Mike Guyette.

8 Q How do you spell Mike's last name?

9 A G-u-y-e-t-t-e.

10 Q Where does he work?

11 A He's a CEO of Blue Cross of Minnesota.

12 Q Was he in that position back in this time

13 period that we're talking about?

14 A Yes.

15 Q Okay. Does he live up in Minnesota?

16 A He does now, yeah.

17 Q Does he --

18 A He formerly was a neighbor of mine, and I

19 consider him a friend.

20 Q Where was he living back in the last quarter

21 of 2013, beginning quarter of 2014?

22 A I have no relevant knowledge of that.

23 Q Okay. Well, the conversation you had with

24 him, where did that occur?

25 A In the 19th hole at the clubhouse at the

49

1 Plantation.

2 Q Okay. So in any event, he was down in Florida

3 and you guys played golf together?

4 A Yeah.

5 Q Okay. What did you tell him about what you

6 had heard?

7 A Something to the effect, "Hey, Mike, let me

8 run something by you." And, you know, that -- and he

9 knows Dr. Deb. And Deb was not with me at that time.

10 And something to the effect, you know, "Let me

11 share something with you. It just doesn't seem right.

12 What should I do? I've got this knowledge that this

13 chiropractor is apparently overbilling patients."

14 And paraphrasing his words, he said, "Well,

15 chiropractors seem to be one of the major problems we

16 have in our industry. It's soft tissue stuff. Some of

17 it's not provable. There's a lot of misrepresentation

18 in billing, and something like that needs to be brought

19 to the authorities."

20 Q Okay. Anything beyond that?

21 A Uh-uh.

22 Q Other than O [REDACTED] who you had talked about

23 earlier and you heard about her and the 56,000, were

24 there any other patients by name that you had heard of

25 any improprieties that related to Dr. Rhodes?

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1 A Not that I can recall.
2 Q Okay. Now, back to your house with the two
3 agents there, you told them that it was based on the
4 information you had heard from Bryant and your friend,
5 Mr. Guyette. Anything else you told him that day?
6 A No. I said it seemed logical to me that they
7 should be talking to Dr. Blanton.
8 Q Okay. Anything else?
9 A Not that I recall.
10 Q Do you know if they ever spoke to Dr. Blanton?
11 A As I remember, they went to see her
12 immediately.
13 Q Okay. Did you go over there with them?
14 A No.
15 Q Okay. When those two agents met with you, did
16 they have any documentation or anything like that that
17 they showed you?
18 A Not that I recall. Just the statement of,
19 Rhodes was on their radar and someone that they were
20 very interested in.
21 Q Did they say why that was?
22 A I mean, I can't recall what the exact words
23 were, but it was insurance -- obviously insurance fraud.
24 Q Okay. Other than that meeting, did you have
25 any more or any further communication with either one of

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1 those agents?
2 A Yes.
3 Q Okay. When was that?
4 A Subsequent to that, I talked to Robbins
5 probably two or three times. Because I believe it was
6 when I met them face-to-face, I mentioned that another
7 good friend of mine was the CEO of Florida Blue, and he
8 said -- I can't remember exactly what he said, but, you
9 know, the net-net is that, "You should share this
10 information with him."
11 And I have -- that might have been at the
12 meeting or the first phone call. I think I might have
13 had three phone calls, one with something -- they just
14 had some, as I remember, simple question, and I asked
15 them if they could share anything. They said, "Yes,"
16 almost quoting them, "we're going to get this guy."
17 Q Okay. Did they say how they were going to do
18 that or --
19 A Well, he was committing insurance fraud.
20 Q Well, did they say that?
21 A I don't recall.
22 Q Okay. Just you specifically recall, "We're
23 going to get this guy"?
24 A Exactly.
25 Q Okay. And then there was another -- I take it

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1 was a phone call where you mentioned you were friends
2 with the CEO of Florida Blue. Who was that at the time?
3 A Still is. Pat Geraghty.
4 Q Okay. Would you spell his name for the
5 record?
6 A G-e-r-a-t-h-y [sic].
7 Q And had you had conversations with
8 Mr. Geraghty about Dr. Rhodes, or were the people at the
9 insurance fraud investigation telling you, "You should
10 have conversations with him about this"?
11 A As I recall they said, "You ought to share
12 this information with Pat."
13 Q Okay. How did it come -- or how did it come
14 out that you knew Pat?
15 A I think, in the course of the conversation, I
16 just mentioned it, you know. They were talking about
17 different insurance companies in Florida, and I said,
18 "Well, you know, I've got -- he's not a close friend,
19 but a friend. It's the CEO of Florida Blue." And he
20 said, "We work closely with Florida Blue." I don't
21 think they said anything about the situation with
22 Rhodes, but, "You might want to apprise them of this
23 information."
24 Q Do you know if any of Rhodes' patients had
25 Florida Blue as their insurance?

53

1 A I have no clue.
2 Q Do you know if Rhodes ever billed Florida Blue
3 for anything?
4 A I take that back. I know for sure that they
5 did.
6 Q Okay. How do you know that?
7 A Because I had ongoing conversations with Pat
8 and the -- and the EVP of risk -- and I can't
9 remember -- it might be Jim something. I can't remember
10 his name. I had one or two conversations with him.
11 And I used to play golf with Pat every Sunday,
12 and he would give me a rundown that, you know, this --
13 this guy apparent- -- you know, Rhodes, apparently,
14 had -- it looks like, overbilled a lot of their
15 customers, and they were working with the FDLE.
16 Q This is after the investigation started?
17 A Yes.
18 Q And you gave me a lot there. When is the
19 first time you spoke with Mr. Geraghty about Dr. Rhodes?
20 A Sometime after my meeting with Robbins and
21 Murphy. And as I recall, I sent Pat an email, you know,
22 "I need to give you a heads up," dada, dada, dada, da.
23 Q Fill in the "dada, dada, da" for me.
24 A Well, that, you know, I had been given some
25 information. I had filed a tip with the Florida

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1 Department of Law Enforcement.
2 Subsequently, whatever you call them,
3 detectives with FDLE had visited me, and there's an
4 active investigation underway of Rhodes, and that, you
5 know, I wanted him to be aware of it. Because as big as
6 Florida Blue is, there are bound to be customers that
7 are -- of Florida Blue that are using Rhodes, and, you
8 know, likelihood there would be some overbilling.
9 Q Okay. When you sent Mr. Geraghty that email,
10 which email address did you send it from?
11 A Probably -- I don't know.
12 Q One --
13 A One of the two.
14 Q One of the two? That's fine.
15 A I generally send all of my emails from
16 Jbryant@Triserve.
17 Q Okay. Okay. And then after you sent that
18 email to Mr. Geraghty about Dr. Rhodes, did he reply to
19 you by email, or did you guys have a phone call, an
20 in-person meeting on the golf course or --
21 A I can't remember how -- well, we ended up
22 having a conversation about it. And he did -- I guess
23 he did some legwork internally and asked me to then
24 speak with the EVP of risk --
25 Q Executive vice president?

55

1 A Yes.
2 Q Okay.
3 A -- about, you know, the tip I had and the
4 conversation I had with FDLE. And when -- and I spoke
5 by phone with the executive vice president of risk. He
6 indicated that they were already working with the FDLE
7 and investigating fraudulent claims from Rhodes.
8 Q Did he tell you anything else?
9 A The EVP of risk?
10 Q Yes, sir.
11 A I can't remember.
12 Q Okay. And you said you can't remember what
13 his name was?
14 A I think I have it in -- I might have -- can
15 find it if you're really interested in it.
16 Q Why don't we do this? When we go on a break,
17 you can look it up.
18 A Sounds good.
19 Q And that way -- okay.
20 Other than the phone call that you had with
21 him -- or was that an in-person or a phone call?
22 A Phone call.
23 Q Okay. Not one time did you ever speak with
24 the EVP of risk again?
25 A I might have, but I don't remember.

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1 Q Do you remember what information you provided
2 him?
3 A Just that it -- and I used Dr. Deb's name,
4 that people in the office had confided in her, that
5 there were -- seemed to be a lot of cases where Rhodes
6 would overbill. When questioned about it, Rhodes
7 appeared to get angry at the people who brought that up
8 to him, and he said, "It's my office, my way. Shut up,"
9 kind of that thing. And that's -- that's the best I can
10 remember.
11 Q And you were just relaying to him what you had
12 heard from Blanton?
13 A Yeah.
14 Q Okay. What she had learned from the ladies at
15 the office?
16 A That's correct.
17 Q Did Blanton ever tell you that she personally
18 observed any overbilling?
19 A I don't recall.
20 Q Okay. And the EVP from Florida Blue told you,
21 "Hey, we're looking into this. We're already working
22 with FDLE on it"?
23 A Yeah. And then Geraghty and I would -- as I
24 recall, we'd talk about it on -- we'd play golf together
25 on Sundays.

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1 Q So tell me about that. You'd get periodic
2 updates on the golf course?
3 A Yeah. The best one was, he was on a driving
4 range. I came up in my golf cart, got out of my golf
5 cart. He turned around. He raised his club in the air
6 and said, "Joe, we got this son of a bitch, and he's
7 going to jail." That was his exact words.
8 Q Do you remember when that was?
9 A No.
10 Q When he said "we," do you know who he was
11 talking about?
12 A "We" is -- I inferred he was talking about
13 Florida Blue.
14 Q Okay.
15 A I'll never forget his exact words, "This guy's
16 going to jail."
17 Q Did he say how he learned that information?
18 A No.
19 Q At some point, Dr. Rhodes was arrested. Did
20 you know that?
21 A Oh yeah.
22 Q Okay. Do you know, kind of, the timing of
23 when the arrest happened versus when Pat Geraghty told
24 you, "We got this son of a bitch. He's going to jail"?
25 A No.

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<p>58</p> <p>1 Q Okay. That's one of the times you can recall</p> <p>2 the updates, and that's probably the ultimate update on</p> <p>3 the case that he could have told you. What other things</p> <p>4 did he tell you out on the golf course?</p> <p>5 A Well, you know, this would be just general</p> <p>6 recollection that, you know, fraud was systematic, you</p> <p>7 know. Through the system, there were certain healthcare</p> <p>8 providers who had a higher propensity for a percentage</p> <p>9 of fraud than others. Chiropractors were up there. If</p> <p>10 not at the top, close to the top.</p> <p>11 He thanked me. I mean, it's just -- you know,</p> <p>12 it's a mumbo jumbo, because we would play. It was a</p> <p>13 group, maybe twelve, so three, four. Sometimes he would</p> <p>14 be in a cart with me, sometimes he wouldn't be. And,</p> <p>15 you know, that's my general memory of that.</p> <p>16 Q Did he ever tell you, you know, for example,</p> <p>17 "Patient" -- you know, "Somebody, he billed this guy too</p> <p>18 much money," or, "Here's what he was doing"? Anything</p> <p>19 specific?</p> <p>20 A Not that I remember.</p> <p>21 Q Okay. Did you ever see any documents from</p> <p>22 Florida Blue as it relates to any alleged overbilling by</p> <p>23 Dr. Rhodes?</p> <p>24 A Not that I remember.</p> <p>25 Q Okay. Did Mr. Geraghty ever say that</p>	<p>60</p> <p>1 Q You didn't have a high regard for him prior to</p> <p>2 hearing anything about fraud, did you?</p> <p>3 A No.</p> <p>4 Q When Dr. Rhodes actually got arrested, how did</p> <p>5 you find out about that?</p> <p>6 A I think Dr. Deb told me, because somebody from</p> <p>7 the office called and told her.</p> <p>8 Q Do you know who that was?</p> <p>9 A I have no clue.</p> <p>10 Q Other than finding out that Dr. Rhodes had</p> <p>11 been arrested, did you learn any more specifics about</p> <p>12 what, you know, what for, what the bond was, anything</p> <p>13 like that?</p> <p>14 A Well, as I remember, it was in the paper</p> <p>15 within a couple of days.</p> <p>16 Q Okay.</p> <p>17 A Mugshot, and it was either six or eight counts</p> <p>18 of fraud.</p> <p>19 Q Did you follow his criminal case at all as it</p> <p>20 proceeded?</p> <p>21 A Generally, yes.</p> <p>22 Q How did you do that?</p> <p>23 A I would Google stuff every once in a while.</p> <p>24 As I remember, Deb would have a conversation with, you</p> <p>25 know, somebody who had worked in the office, you know,</p>
<p>59</p> <p>1 Dr. Rhodes had committed insurance fraud?</p> <p>2 A I can't remember.</p> <p>3 Q Okay. How about the guy, the executive vice</p> <p>4 president?</p> <p>5 A I think, you know, a general memory would be,</p> <p>6 "We believe we have evidence that he has committed</p> <p>7 insurance fraud."</p> <p>8 Q Okay. Did you ever see any of that evidence?</p> <p>9 A No.</p> <p>10 Q You said there may have been two or three</p> <p>11 phone calls with Robbins. You detailed two of them.</p> <p>12 One was, "We're going to get this guy." The second</p> <p>13 one -- I'm paraphrasing -- was basically the "talk to</p> <p>14 Geraghty" phone call. Was there a third one that you</p> <p>15 can recall?</p> <p>16 A It's just -- it's a general memory. It might</p> <p>17 have been only two. I just don't remember.</p> <p>18 Q Did you ever talk to Geraghty at all about</p> <p>19 Dr. Rhodes after Geraghty made the statement, "He's</p> <p>20 going to get arrested. We got this son of a bitch"?</p> <p>21 A Yeah, some general conversation.</p> <p>22 Q What do you recall about those?</p> <p>23 A Well, I didn't have a high regard for this</p> <p>24 gentleman, and we kind of talked about -- just in</p> <p>25 general.</p>	<p>61</p> <p>1 "What's going on," yada, yada, yada, yada.</p> <p>2 Q So even after Dr. Blanton had left the</p> <p>3 practice, she stayed in contact with people that still</p> <p>4 worked in the office?</p> <p>5 A That's my understanding, yes.</p> <p>6 Q Okay. Did anybody from the state attorney's</p> <p>7 office ever talk to you about Dr. Rhodes?</p> <p>8 A Not that I can remember.</p> <p>9 Q Okay. And through your following the case</p> <p>10 through Google, or your updates from Dr. Blanton from</p> <p>11 hearing from people at the office, did you come to learn</p> <p>12 what ultimately happened with the case?</p> <p>13 A Well, apparently, charges were dismissed, and</p> <p>14 probably this guy, being the kind of guy he is, he</p> <p>15 rolled over on a bunch of people and turned them in.</p> <p>16 Q Do you know that or do you suspect that?</p> <p>17 You're speculating; right?</p> <p>18 A Yes, because nobody gets indicted for that</p> <p>19 many counts of fraud and gets off. There had to be some</p> <p>20 consequences.</p> <p>21 Q Would you be surprised to learn that</p> <p>22 Dr. Rhodes didn't roll over on anybody?</p> <p>23 A That's wonderful for him, isn't it? You can</p> <p>24 be a crook and get away with it. America is wonderful.</p> <p>25 Q Do you have any personal knowledge as to</p>

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1 Dr. Rhodes committing any insurance fraud?

2 A Only what I was told and what I learned from

3 the FDLE and Florida Blue.

4 Q Okay. But no personal knowledge?

5 A No.

6 MR. DeMAGGIO: Why don't we take a quick

7 break?

8 MS. KURTZ: I was just going to say, if you're

9 going to start with the exhibits --

10 MR. DeMAGGIO: Yeah. They're not anything you

11 haven't seen. They're the ones that are attached

12 to the complaint. So, yeah, we'll take a

13 ten-minute break.

14 (Brief recess.)

15 BY MR. DeMAGGIO:

16 Q Mr. Bryant, during the break, you looked up

17 the name of the individual who you had understood to be

18 the executive vice president at Blue Cross. Do you have

19 his name, and is there a different title that he has

20 with the organization?

21 A There's a different title. His name is Jay,

22 J-a-y, Alligood, A-l-l-i-g-o-o-d. He's vice president

23 and chief audit executive.

24 Q Thank you, sir.

25 Do you have any knowledge as to whether or not

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1 he's still in that position at Florida Blue?

2 A I have no knowledge.

3 Q All right. Okay. I want to share a couple of

4 documents with you. We'll make this Exhibit 1. This is

5 what's Exhibit A to the complaint.

6 MR. DeMAGGIO: Do you want a copy?

7 MS. KURTZ: Yes, please.

8 (Plaintiff's Exhibit No. 1 was marked for

9 identification.)

10 BY MR. DeMAGGIO:

11 Q Do you recognize that, sir?

12 A Yes.

13 Q And what is that?

14 A It's a post on Facebook.

15 Q You're on Facebook?

16 A Yes.

17 Q Okay. So the Joe Bryant, that's you?

18 A Yes.

19 Q And you posted what's written there in

20 Exhibit 1?

21 A Absolutely.

22 Q Okay. And that would have been done on

23 December 29?

24 A December 29th.

25 Q Okay. Do you know how many friends you have

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1 on Facebook?

2 A A bunch.

3 Q I mean, more than 100, more than 1,000?

4 A It's more than 2,000.

5 Q Okay.

6 A Very few are here. Most of them are in

7 Nashville.

8 Q How long have you been on Facebook?

9 A I don't know.

10 Q Okay. At least as of December of 2013?

11 A Correct.

12 Q Okay. What prompted you to write that?

13 A I don't remember. Somebody had posted

14 something about Rhodes, I assume.

15 Q Okay. I'll show you what we'll mark as

16 Exhibit 2. This is Exhibit B to the complaint.

17 (Plaintiff's Exhibit No. 2 was marked for

18 identification.)

19 BY MR. DeMAGGIO:

20 Q Do you recognize that, sir?

21 A Yes.

22 Q Is that your post as well?

23 A Correct.

24 Q And would the date on that reflect when you

25 would have posted it?

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1 A I would assume. Facebook doesn't lie.

2 Q Okay. At that point in time when you wrote

3 "He," being Dr. Rhodes, "abuses his staff, is

4 untrustworthy, and guilty of insurance fraud. He should

5 lose his license and be put out of" -- you got "out if

6 business." I think you mean "out of business" --

7 A Uh-huh.

8 Q -- what information did you have to support

9 those claims?

10 A Information that we've already talked about.

11 Q The talking to Ms. Blanton who had talked to

12 the people at the office?

13 A Uh-huh.

14 Q Okay. Yes?

15 A Yes.

16 Q That wasn't based on any personal information

17 that you had?

18 A No. It was an opinion, which I am entitled to

19 have, I believe.

20 (Plaintiff's Exhibit No. 3 was marked for

21 identification.)

22 BY MR. DeMAGGIO:

23 Q And then Exhibit 3, which is Exhibit C to the

24 complaint.

25 A Oh, yeah.

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1 Q Do you recognize that, sir?

2 A Right. I was saying, "Oh, yes," because I

3 recognize this name, Jessie. I had forgotten her.

4 Q Yeah. And I want to go through -- this is

5 Exhibit 3, is the tip that you sent into the Division of

6 Insurance Fraud; right?

7 A Correct.

8 Q Okay. I take it you sent this in by email?

9 A Correct.

10 Q And did you do that -- did you just email

11 somebody blindly or does the --

12 A No. The Florida Department of Law

13 Enforcement, as you probably should know, has a link on

14 there to report misdeeds.

15 Q So you went through their online portal to do

16 this?

17 A Correct.

18 Q Okay. And as we go through this -- I just

19 want to go through it with you. "Rhodes is a

20 chiropractor doing business in Jacksonville Beach,

21 Florida. Based on information I know to be true,

22 Rhodes, for some time, has been billing patients'

23 insurance companies for services that were never

24 provided."

25 What information did you have that you knew to

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1 be true at that time?

2 A What I had heard.

3 Q So how did you know it to be true?

4 A Well, Deb Blanton is probably the purest

5 person I have ever met, and she would not share any

6 information that she didn't know to be true. So I took

7 that at its face value.

8 Q She didn't know, though, did she? She was

9 talking to the ladies in the office; right?

10 A I think -- I don't know. She sure knew about

11 this \$56,000 that O█ got about 2,000 worth of massage

12 time, or whatever he does.

13 Q Well, do you know Dr. Blanton to have ever had

14 any conversations with O█ personally about that

15 billing amount?

16 A I do not know.

17 Q Do you know whether or not Dr. Blanton ever

18 worked in the billing department at Dr. Rhodes' office?

19 A I do not know.

20 Q Do you know if Dr. Blanton ever performed any

21 work on O█ as a patient?

22 A I do not know.

23 Q Do you know whether or not Dr. Rhodes ever

24 performed any work on her as a patient?

25 A I would assume since he's suing her that, yes,

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1 he did.

2 Q Do you personally know, though?

3 A Well, personally, I know what's fact. He

4 filed a lawsuit against her claiming defamation, so --

5 and I believe in that lawsuit, it indicates that she was

6 a patient of his. So, yes, that's fact.

7 Q Okay. Have you ever seen any of his billings

8 that he submitted for any treatment he rendered to O█?

9 A I don't believe I have.

10 Q Okay. So the sentence that you read about one

11 example, a woman was involved in an auto accident

12 recently and three months her insurance company was

13 billed for over \$56,000 in treatments, the majority of

14 which never took place, the woman you're referencing

15 there is O█?

16 A At the time, I didn't know her name, yes.

17 Q But now, that's who you're referencing?

18 A Yes.

19 Q Okay. Who did you hear the number 56,000

20 from?

21 A I assume Dr. Deb.

22 Q Do you know who she heard it from?

23 A I assume it was conversation in the office.

24 Q Okay. Then you go on to write, "Two

25 individuals in his office had been aware of this issue

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1 for some time and have questioned him on several

2 occasions. They were told to mind their own business."

3 Do you know who those two individuals were?

4 A I believe it was Jessie and Missie, now that

5 I've seen her name.

6 Q Have you ever met Jessie?

7 A Not to my knowledge.

8 Q Okay. Do you know Jessie's last name?

9 A No.

10 Q Do you know if she worked for Dr. Rhodes?

11 A Yes.

12 Q You know that because Dr. Blanton told you

13 that?

14 A Yes.

15 Q Do you know what Dr. -- or do you know what

16 Jessie did there?

17 A Well, as I put in there, she handles part of

18 the billing or something, so I assume that's what she

19 did.

20 Q What you put in here was, "Jessie, don't know

21 her last name, handled all billings and was so suspect

22 of what was going on that she resigned and took another

23 job in the last few months."

24 Where did you get that information from?

25 A From Dr. Deb.

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1 Q Okay. You don't know whether or not that's
2 true, do you?
3 A Well, I have to believe it's true because Deb
4 told me, and she was in contact with all of these
5 people.
6 Q So what she would have told you is that Jessie
7 left working there, is because she was suspect about
8 what was going on and took another job?
9 A I sure didn't make that up, Counselor.
10 Q Okay. Well, what if I told you that she got a
11 job that was higher paying?
12 A It wouldn't doubt me at all, because he
13 probably is -- treats his -- the way he treats his
14 staff, that I heard, probably doesn't pay them well.
15 Q What if I told you that she subsequently came
16 back to work for Dr. Rhodes?
17 MS. KURTZ: Objection. Calls for speculation.
18 We don't even know the last name of the person
19 you're talking about.
20 A I couldn't care less about it. Facts --
21 understand something, Counselor. Facts are our friends.
22 And if we end up going to court, all the facts will be
23 laid out, and then a jury can decide what's what.
24 BY MR. DeMAGGIO:
25 Q Absolutely. "Missie" -- it says again --

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1 "don't know her last name." I represented to you that
2 it was Ross earlier. Does that --
3 A That seems right.
4 Q Okay. "-- is a massage therapist, is totally
5 aware of the fraud that is going on."
6 Did you ever talk to Missie directly about any
7 fraud that may have been going on?
8 A I can't remember exactly if I did. I think I
9 did, but I -- because -- I don't know.
10 Q Okay. If you talked to her, would it have
11 been phone, email, in person?
12 A I don't know.
13 Q Okay. "The recent news that above-mentioned
14 patient is claiming fraud against Rhodes caused her to
15 seek out an attorney who counseled her to immediately
16 leave the job to take her out of any potential
17 liability."
18 Where did you learn about that information?
19 A I have no clue. I don't remember it.
20 Probably -- it would have to be Dr. Deb.
21 Q Then you go on to write (as read), "Rhodes
22 likes to brag that all his patients love him and that
23 the are willing to cut corners with him in order for
24 Rhodes to receive more income than he's entitled to."
25 Where did you learn that from?

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1 A From either Missie, Tammy, or Jessie.
2 Q Okay.
3 A And Dr. Deb.
4 Q You had never spoken to Rhodes. I think you
5 said that; right?
6 A Never.
7 Q Okay. And you've never actually been to the
8 office either?
9 A Yes, I have.
10 Q Oh, you've been to that office?
11 A Uh-huh.
12 Q When?
13 A I don't remember.
14 Q When you were there, was Rhodes present?
15 A No.
16 Q "There are a number of patients who are
17 elderly and thereby are covered either by Medicare or
18 Medicaid, thus very little insurance reimbursement where
19 Rhodes treats an adult child of the patient and performs
20 no treatments, yet bills for substantial treatment with
21 each visit."
22 A There was a situation where he was
23 overcharging a patient. As I recall, he was
24 overcharging a patient and then doing some work for a
25 child of the patient, or something like that.

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1 Q Who did you learn that from?
2 A I don't think I ever -- since I've testified
3 before, I can't remember exactly who I spoke with, if I
4 did, who I texted, emailed with or who I did, but that's
5 something that I heard more than once.
6 Q Okay. When you sat down at a computer,
7 presumably, and entered this information in there to
8 send it to the folks at Department of Insurance Fraud,
9 where physically was that computer? Where were you
10 sitting?
11 A What does that got to do with anything?
12 Q Where was it?
13 A What difference does it make where it was? It
14 was in my house someplace.
15 Q Okay. Was anybody present with you when you
16 did this?
17 A No.
18 Q Okay. Did you know that O█ submitted a tip
19 shortly after on the same day that you did?
20 A I had no clue.
21 Q Okay. Do you even know who O█ insurance
22 company was?
23 A I have no knowledge.
24 Q Do you remember, roughly, how long after you
25 submitted this tip that you had your meeting with the

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<p>74</p> <p>1 two agents?</p> <p>2 A It was almost instantaneous.</p> <p>3 Q Okay. Did they indicate to you, the two</p> <p>4 agents, when they spoke to you, that they had spoken</p> <p>5 with anybody else about this investigation prior to</p> <p>6 speaking with you?</p> <p>7 A Yeah. They said they were investigating</p> <p>8 Rhodes, so I assumed from that that they had talked to</p> <p>9 some people.</p> <p>10 Q When they spoke to you, did they record the</p> <p>11 interview, do you know?</p> <p>12 A I have no remembrance of that.</p> <p>13 Q Okay. Are there any other Facebook posts</p> <p>14 about Dr. Rhodes that you've ever done that I don't have</p> <p>15 in front of you as Exhibits -- either 1 or 2?</p> <p>16 A Well, since he's not at the top of my mind, I</p> <p>17 have no idea, but I assume these are the only two.</p> <p>18 Q Okay. And then other than the report to the</p> <p>19 insurance fraud there, did you report anything else to</p> <p>20 them in writing?</p> <p>21 A To whom?</p> <p>22 Q To the Department of Insurance Fraud, the tip</p> <p>23 that you did there.</p> <p>24 A I don't think it's the Department of Insurance</p> <p>25 Fraud. I think it's the Florida Department of Law</p>	<p>76</p> <p>1 office, either Jessie or Missie, anything else since the</p> <p>2 lawsuit's been filed?</p> <p>3 A I don't know.</p> <p>4 Q Okay. Do you have any documentation in your</p> <p>5 possession -- and I don't mean here today -- but</p> <p>6 documentation that's available to you which would</p> <p>7 substantiate your claims that Dr. Rhodes was guilty of</p> <p>8 insurance fraud?</p> <p>9 A Other than what the FDLE said, what Pat</p> <p>10 Geraghty said, and the fact that he was indicted. And</p> <p>11 obviously the two of you manipulated the system. And</p> <p>12 you say he didn't roll over. Maybe he didn't roll over,</p> <p>13 but there was some kind of plea bargain or etc., because</p> <p>14 a case like this doesn't disappear without some type of</p> <p>15 settlement. Right? Anyway...</p> <p>16 Q Is that your opinion too?</p> <p>17 A Well, I know there's certain facts that I just</p> <p>18 alluded to. He committed insurance fraud. You don't</p> <p>19 get indicted. And don't give me the ham sandwich stuff.</p> <p>20 He got indicted for not one, not two, not three, not</p> <p>21 four, not five, not six counts of insurance fraud, so</p> <p>22 he's obviously a scumbag and he's a crook.</p> <p>23 Q Have you seen the -- he wasn't indicted. Have</p> <p>24 you seen the information that was filed against him?</p> <p>25 A No.</p>
<p>75</p> <p>1 Enforcement. That's who I made the tip to.</p> <p>2 Q Okay. That's fine. Other than your attorney,</p> <p>3 who have you spoken to about this lawsuit? Have you</p> <p>4 spoken to Ms. -- or Dr. Blanton about it?</p> <p>5 A Yes.</p> <p>6 Q What have you guys talked about when you've</p> <p>7 talked about the lawsuit?</p> <p>8 A Very little. I just told her that Rhodes was</p> <p>9 filing suit against me. And, you know, she had to</p> <p>10 testify, do a deposition recently, and she talked about</p> <p>11 that. I talked about having to do a deposition. But</p> <p>12 any in-depth conversations about any of our</p> <p>13 conversations or anything like that, we didn't do that.</p> <p>14 Q When this lawsuit got filed, beginning of '16,</p> <p>15 what address were you living at then?</p> <p>16 A I have no clue. Probably 1657 Thicket Creek</p> <p>17 Trail.</p> <p>18 Q Okay. Have you talked to Tammy Wilson since</p> <p>19 the lawsuit's been filed?</p> <p>20 A I don't know.</p> <p>21 Q Okay. How about O [REDACTED] other than the email</p> <p>22 about, "You've been named. I'm going to put you in</p> <p>23 touch with Ms. Kurtz"?</p> <p>24 A I'm pretty sure I've never spoken with O [REDACTED]</p> <p>25 Q Okay. And those two other ladies at the</p>	<p>77</p> <p>1 Q Have you seen any of the documents relating to</p> <p>2 the criminal case?</p> <p>3 A I don't recall.</p> <p>4 Q Okay. And I think we've established you</p> <p>5 haven't seen any of the billing records; correct?</p> <p>6 A Correct.</p> <p>7 Q None of the medical records that he treated?</p> <p>8 A Yeah.</p> <p>9 Q Okay. Did Mr. Geraghty give you anything in</p> <p>10 writing about any alleged improprieties of Dr. Rhodes?</p> <p>11 A Not that I'm aware of.</p> <p>12 Q Same thing with Mr. Alligood?</p> <p>13 A Not that I'm aware of.</p> <p>14 Q Did Dr. Blanton give you anything in writing?</p> <p>15 A Not that I can remember.</p> <p>16 Q Any of the ladies at the office?</p> <p>17 A Not that I can remember.</p> <p>18 Q And you don't know them personally, I think</p> <p>19 you said; right?</p> <p>20 A Correct.</p> <p>21 Q Okay. So you don't know what their veracity</p> <p>22 may be?</p> <p>23 A No.</p> <p>24 Q Okay. Did you have any friends that were</p> <p>25 working or -- strike that.</p>

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78	1 Did you know anybody that worked at the state 2 attorney's office in Jacksonville back in 2013, 2014? 3 A No. 4 Q Okay. 5 MR. DeMAGGIO: Give me two minutes. I think 6 I'm almost done. 7 MS. KURTZ: Okay. 8 (Brief recess.) 9 BY MR. DeMAGGIO: 10 Q Just one other question for you, Mr. Bryant. 11 Other than Facebook, are you on any other social media 12 websites? 13 A Well, I have an Instagram account, and I have 14 a Twitter account, but it's extremely, extremely rare 15 when I post something. Like, I posted five pictures or 16 something on Instagram the other day. It's probably the 17 first time I've done something in -- I don't know when. 18 Q Got you. Have you ever posted on either one 19 of those social networking sites about Dr. Rhodes? 20 A No. 21 Q Okay. 22 MR. DeMAGGIO: I don't think I have any 23 further questions for Mr. Bryant. I'll say that 24 you're more on social media than I am, so you're 25 not as old as you think you are. So there you go.
79	1 THE WITNESS: Well, I've got a 19-year-old 2 daughter. 3 MR. DeMAGGIO: Okay. 4 CROSS-EXAMINATION 5 BY MS. KURTZ: 6 Q I just have one follow-up question. 7 Mr. Bryant, I want to turn your attention to what I 8 believe has been marked as Exhibit 2 of the complaint. 9 This is, I think you testified, a Facebook post? 10 A Correct. 11 Q Did you post all of the comments that appear 12 on Exhibit 2 or just the comments that appear under your 13 name and above the date December 29th, 2013. 14 A Only my name and above the date. 15 Q Okay. 16 MS. KURTZ: Those are all my questions for 17 you. Thank you. 18 THE WITNESS: Sure. 19 MR. DeMAGGIO: Read? 20 MS. KURTZ: Waive. 21 MR. DeMAGGIO: Okay. 22 (This deposition concluded at 10:49 a.m.) 23 --- 24 25

80

1 CERTIFICATE OF OATH
2
3 STATE OF FLORIDA)
4 COUNTY OF ST. JOHNS)
5
6 I, Maia Randosh, Court Reporter, certify that
7 JOSEPH PRESTON BRYANT personally appeared before me on
8 the 18th of July, 2017 and was duly sworn.
9
10 Signed this 28th day of July, 2017.
11
12
13 Maia Randosh, Court Reporter
14
15
16 (AFFIX NOTARY SEAL)
17
18
19
20
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24
25

81

1 CERTIFICATE OF REPORTER
2
3 STATE OF FLORIDA)
4 COUNTY OF ST. JOHNS)
5
6 I, Maia Randosh, Court Reporter, do hereby certify
7 that I was authorized to and did stenographically report
8 the deposition of JOSEPH PRESTON BRYANT; that a review
9 of the transcript was not requested; and that the
10 foregoing transcript is a true record of my stenographic
11 notes.
12
13 I FURTHER CERTIFY that I am not a relative,
14 employee, attorney or counsel of any of the parties, nor
15 am I a relative or employee of any of the parties'
16 attorney or counsel connected with the action, nor am I
17 financially interested in the action.
18
19 DATED this 28th day of July, 2017.
20
21 Maia Randosh, Court Reporter
22
23
24
25

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