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CITY OF NEW ROCHELLE

BOARD OF ETHICS

-----X

IN RE:

ETHICS COMPLAINT OF ROBERT COX

-----X

515 North Avenue  
New Rochelle, NY 10801  
May 2, 2022  
4:00 p.m.

Examination of ADAM SALGADO, in the  
above-captioned matter, held at the above  
time and place, before Christine  
Giustiniani, a Notary Public of the State  
of New York.

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A P P E A R A N C E S :

WILSON ELSER MOSKOWITZ EDELMAN & DICKER, LLP

Attorneys for the ETHICS COMMITTEE

1133 Westchester Avenue

White Plains, New York 10604

BY: PETER A. MEISELS, ESQ.

(914) 391-3690

PETER.MEISELS@WILSONELSER.COM

ALSO PRESENT :

CHARLES PHIPPS, Ethics Committee Member

DAVID BLUMENTHAL, Ethics Committee Member

NEW ROCHELLE LAW DEPARTMENT

BY: DAWN WARREN, ESQ.

1 Salgado

2 A D A M S A L G A D O, a witness called  
3 on behalf of the City of New Rochelle,  
4 having been first duly sworn by a Notary  
5 Public of the State of New York, was  
6 examined and testified as follows:

7 THE COURT REPORTER: Please  
8 state your name and title for the  
9 record.

10 THE WITNESS: Adam Salgado,  
11 Commissioner of Development for the  
12 City of New Rochelle.

13 THE COURT REPORTER: Please  
14 state your business address.

15 THE WITNESS: 515 North Avenue,  
16 New Rochelle, New York, 10801.

17 EXAMINATION BY

18 MR. MEISELS:

19 Q. Commissioner, my name is Peter  
20 Meisels. I represent the Board of Ethics.  
21 And as you may know we are investigating a  
22 complaint that was filed by Robert Cox.

23 This is purely an  
24 investigation. No charges or anything of  
25 that sort have been filed or brought by

1 Salgado

2 this Board or anybody. It is just under  
3 your ethics code when a citizen makes this  
4 kind of a complaint, this board  
5 investigates it.

6 So this is not an adversarial  
7 proceeding, and no one has been accused by  
8 this Board of doing anything, okay.

9 I'm going to ask you some  
10 questions to get the ball rolling. The  
11 board members are going to ask you some  
12 questions, and then you are free to tell us  
13 anything you would like to tell us if you  
14 think we forgot to ask or didn't think to  
15 ask or didn't know to ask.

16 It is quite informal, all  
17 right. Mr. Cox made a complaint that the  
18 mayor and contrary to the charter made an  
19 effort to get himself appointed by the city  
20 manager to the position that you now hold.

21 The second complaint was that  
22 the mayor attempted to influence the city  
23 manager on the question of appointing a  
24 deputy city manager. That's what this is  
25 about.

1 Salgado

2 How long have you have you been  
3 employed by New Rochelle?

4 A. I started in 2014. So a little  
5 over eight years or a little under eight  
6 years.

7 Q. When you --

8 A. August 18, 2014 is when I  
9 started. Not that I'm counting. I won't  
10 do the math in my head.

11 Q. When you first joined the city,  
12 what position did you hold?

13 A. The operations manager for the  
14 department of development.

15 Q. And did there come a time that  
16 you got a promotion?

17 A. I got a promotion to the  
18 development -- to the deputy commissioner  
19 of development.

20 Q. When did you become the deputy?

21 A. I became the deputy in 20 -- I  
22 want to say 18, I believe. Yeah, 2018.

23 Q. Am I correct you became  
24 commissioner towards the end of last year?

25 A. I became commissioner a month

1 Salgado

2 ago.

3 Q. Oh, a month ago?

4 A. Yes.

5 Q. So that would be April of 20 --

6 A. April 2nd or 3rd.

7 Q. -- 2022?

8 A. Yes. If I'm being totally -- I  
9 was originally -- I was promoted first to  
10 the deputy commissioner of finance. I was  
11 in charge of procurement downstairs. I got  
12 hired from here to go work in the finance  
13 department.

14 And six months later I was  
15 asked to come back up to be in development  
16 as a deputy commissioner when my, the  
17 previous deputy commissioner retired. It  
18 was like a four-month period where I was in  
19 finance. I just want to give full  
20 disclosure.

21 MR. BLUMENTHAL: He has  
22 experience in both areas.

23 Q. That had to be the least  
24 interesting four months that you have been  
25 with the City of New Rochelle.

1 Salgado

2 A. It wasn't great.

3 Q. I give him a lot of credit.

4 A. I wanted the title. I was  
5 ambitious, you know.

6 Q. Sure, absolutely. At any rate  
7 this is going to be fun for you in  
8 development in this day and age. At any  
9 rate, during the time that you served as  
10 deputy commissioner for economic  
11 development, did you ever have occasion to  
12 have any conversations with the mayor at  
13 all about the concept of his becoming the  
14 commissioner of development?

15 A. What was your time frame?

16 Q. While you were deputy?

17 A. No.

18 Q. At any time did you ever have  
19 any conversations with him about his  
20 becoming the commissioner of development?

21 A. Not with him, no.

22 Q. Did you have conversations with  
23 other people about it?

24 A. Yes, yes.

25 Q. Could you explain?

1 Salgado

2 A. Sure. When I -- after I was --  
3 well after I notified Chuck and Kathleen  
4 that I was going to submit my application  
5 for the commissioner of development  
6 position which I did, when I found out they  
7 were going to hire a recruitment firm and  
8 that they originally they were going to  
9 hire a recruitment firm and they told me  
10 that I should apply.

11 And there was some weeks  
12 between when they told me they encouraged  
13 me to apply and when I actually did apply.  
14 And when I finally did submit my resume, I  
15 mentioned it to Chuck. And Chuck mentioned  
16 to me that he was concerned about how the  
17 mayor would treat me publicly if I was to  
18 get the job.

19 He was concerned and I guess  
20 wanted me to be aware of that and to have  
21 that information before I went ahead and  
22 applied for the job because he was  
23 concerned and he had mentioned that the  
24 mayor wanted the job.

25 Q. Approximately when did that

1 Salgado

2 conversation take place?

3 A. Approximately August or  
4 September of 2021.

5 Q. Do you recall any other  
6 conversations with anybody dealing with the  
7 possibility that the mayor might want to  
8 apply for that position?

9 A. Not directly, but when my  
10 predecessor first announced his retirement,  
11 I mentioned that I wanted to put my name in  
12 the hat, throw my hat in the ring for the  
13 development commissioner position. And he  
14 didn't think it was a good idea.

15 And he suggested that I would  
16 be -- if I didn't get it, I would be  
17 vulnerable and perceived as competition if  
18 somebody else was to get it. And he also  
19 mentioned that he was being retained as a  
20 consultant after he retired and was going  
21 to run the department with Kathleen and the  
22 mayor; that the three of them were going to  
23 continue running the department after he  
24 retired.

25 Q. Your predecessor was Luiz

1 Salgado

2 Aragon?

3 A. Yes, Luiz with a Z.

4 Q. So Commissioner Aragon told you  
5 he didn't think it was a hot idea for you  
6 to apply because why?

7 A. That I -- he was concerned that  
8 if I didn't get it that I would be  
9 perceived as competition for the successor,  
10 and that at my stage of my career because I  
11 have about ten years or so before  
12 retirement that in this climate it would be  
13 safer for me to keep my head down and not  
14 apply for it.

15 Q. It was -- he told you he had  
16 already been retained as a consultant to --

17 A. To work with Kathleen and the  
18 mayor to run the department.

19 Q. Okay.

20 A. And then he set up meetings,  
21 you know, we had meetings and recurring  
22 meetings.

23 Q. Did he convey to you the idea  
24 that the mayor would be the commissioner?

25 A. Not exactly, no, no. Just that

1 Salgado

2 he was going to work with the mayor and  
3 Kathleen.

4 Q. To run the department?

5 A. To run the department.

6 Q. And after he retired before you  
7 were appointed, was Kathleen the acting  
8 commissioner?

9 A. Yes, Kathleen was appointed  
10 acting commissioner.

11 Q. Was it understood in the  
12 department that she would remain acting  
13 commissioner until a new commissioner was  
14 appointed?

15 A. Correct.

16 Q. Whoever that might be?

17 A. Uhm hhm, yes.

18 Q. Did you have discussions with  
19 anyone else relating to the idea of --

20 A. Well, after Kathleen was named  
21 acting commissioner, we had had our  
22 one-on-one with Chuck and Kathleen and  
23 myself. And I had mentioned what Luiz had  
24 said. And Chuck stated that was not his  
25 vision for how the department would be run

1 Salgado

2 post Luiz' retirement.

3 MR. PHIPPS: Repeat that. I'm  
4 sorry.

5 A. We had met with Chuck. We had  
6 our first sort of one-on-one you know  
7 within a few weeks of Kathleen being  
8 appointed the interim commissioner of  
9 development. And I mentioned to Chuck that  
10 Luiz said that he was going to be a  
11 consultant and run the department with  
12 Kathleen and the mayor.

13 And Chuck said that was not his  
14 intention and that was not his planned way  
15 of running the department; that I was going  
16 to be the deputy and I was going to support  
17 Kathleen as the interim commissioner. And  
18 Luiz was a consultant, but he was not in a  
19 leadership role; that he was reporting to  
20 me essentially.

21 Q. And how long did that  
22 arrangement last?

23 A. About I would say until -- well  
24 in terms of him remaining a consultant?

25 Q. Yes?

1 Salgado

2 A. I mean he remained a consultant  
3 I think until September of last year, but  
4 it wasn't -- we weren't meeting with him  
5 very often. His utility had sort of  
6 dwindled once Kathleen and I started  
7 working in earnest and once I started to  
8 make the connections with the developers  
9 and with the contracts and I had already  
10 had that history in the department so a lot  
11 of -- I knew the developers already.

12 I didn't really have to  
13 establish too many relationships, but you  
14 know there were some decisions that were  
15 made that were in the previous -- in Luiz'  
16 sort of purview, so once that sort of  
17 information was sort of passed, we relied  
18 on him less and less.

19 But we terminated the contract  
20 in September.

21 MR. BLUMENTHAL: When you say  
22 you terminated the contract, you used the  
23 word we.

24 THE WITNESS: Kathleen and  
25 myself.

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MR. BLUMENTHAL: Thank you.

THE WITNESS: I mean the city.

MR. BLUMENTHAL: I was just thinking did you have to run that idea by anybody or was it an open ended contract?

THE WITNESS: It was a retainer agreement, and it was on a month to month basis.

MR. BLUMENTHAL: Okay, so at the end of that month you guys said we are giving you X notice. Thank you very much. Enjoy Florida.

THE WITNESS: Yes.

Q. Can you think of any other conversations you had with anybody that related to actually who was going to become commissioner?

A. I mean not -- no, I mean except for, you know, my friends and people in the community. But in terms of you know within the city I had expressed my desire to be the commissioner to Chuck, and Kathleen certainly knew. Kathleen had encouraged me

1 Salgado

2 to apply. Chuck had called me in  
3 specifically to tell me I should apply for  
4 the commissioner position. I was hopeful  
5 that I could get it.

6 I mean, there was a buzz that  
7 the mayor wanted the job. I'm not going to  
8 -- I mean there was a buzz. I can't  
9 remember any specific conversation that I  
10 had with anyone about it, but I would say  
11 early in the year because if you recall,  
12 they did more than one posting for the job.

13 So there was the first posting  
14 they issued right away and they didn't get  
15 any leads. And then the second one was  
16 issued, and that's when I sort of started  
17 to hear scuttle bug from a variety of  
18 sources asking me did I know was it going  
19 to be him, things like that. What's my --  
20 you know do I think we will work well  
21 together, just it was sort of gossip  
22 honestly. It wasn't anything specific.

23 Q. Given the gossip that you  
24 heard, did you have any concerns in  
25 applying for the job that might put you at

1 Salgado

2 odds with the mayor?

3 A. I was definitely concerned. I  
4 was definitely concerned. I know that, you  
5 know, every month we have to go before  
6 council and we have to make presentations  
7 for a variety of zoning changes or if we  
8 want to introduce new programs or request  
9 funding for certain things we have to sort  
10 of convince the council.

11 And the mayor sits at the head  
12 of that body. And I was concerned that  
13 that was going to be tough.

14 Q. And in actuality how did it  
15 work out?

16 A. When I was appointed the mayor  
17 had come in to my office that morning and  
18 he said I know what you may have heard.  
19 Despite what you may have heard, I'm  
20 delighted by your appointment was his  
21 words. And he said I think you need to --  
22 I think you should call Luiz and make it  
23 right.

24 And I said --

25 Q. What did you understand that to

1 Salgado

2 mean?

3 A. That Luiz was upset that I  
4 wasn't relying on him as you know an  
5 advisor like sage counsel type person and  
6 that we let his contract expire and I  
7 wasn't utilizing him for his knowledge.

8 I think he felt left out. And  
9 I didn't know he was upset at me because I  
10 had no conversations with Luiz. So it was  
11 interesting to hear it from the mayor.

12 Q. Right. And what if anything  
13 did you do about that?

14 A. I said that I think if anyone  
15 -- I told him I think Luiz owes me a call  
16 if anything. And so I did, I got a call  
17 from Luiz, a congratulatory call.

18 MR. PHIPPS: And?

19 THE WITNESS: And he told me I  
20 was likeable.

21 MR. MEISELS: That's true.

22 THE WITNESS: Thank you.

23 MR. MEISELS: You are.

24 THE WITNESS: That's why I got  
25 it. He wasn't effusive at all. It

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was a little weird, but thank you for calling me to tell me I was likeable.

MR. BLUMENTHAL: Send him to us. We will set him straight. Did you feel uncomfortable before Luiz called? First, what the mayor said I will use the words making it right and secondarily, when the call comes in, I mean, how does that make you feel and what does that make you think going forward?

Are you supposed to make use of his services or is that an instruction coming from on high? Is that helping you with your job or is it just merely a suggestion?

And again I don't want to inject myself into your brain at that time, but what are you thinking then?

THE WITNESS: I'm thinking it is uncomfortable because I knew Luiz was upset that we terminated his contract. And I know Luiz for a long time. You know, I worked with him on

1 Salgado

2 and off over the years in different  
3 contexts. So I know he's very proud  
4 and I know it must have been hard for  
5 him to see someone who was you know  
6 under him or that he oversaw step  
7 into a role that he had occupied.

8 So I knew it was not going to  
9 be an easy call, and I was  
10 uncomfortable with it and I honestly  
11 was -- I was uncomfortable. I did  
12 it. You know, I answered the call,  
13 and at least I felt I had to stand my  
14 ground. But I was definitely  
15 uncomfortable. It was awkward.

16 MR. BLUMENTHAL: That part I  
17 get. But when the mayor is making  
18 his suggestion to you either you  
19 should call or whatever, how are you  
20 reading that instruction?

21 THE WITNESS: I'm reading it  
22 that the mayor has a specific point  
23 of view about the direction that we  
24 should be going in and that is  
25 embodied by how Luiz ran the

1 Salgado

2 department. And I don't know that he  
3 is -- I mean, our sort of tenure,  
4 Kathleen and I the first year and  
5 what we are continuing here is really  
6 kind of looking to expand diversity,  
7 expand opportunities for segments of  
8 the population that had previously  
9 felt maybe sort of separated from the  
10 development.

11 So we were, you know, stepping  
12 up our commitments to minority and  
13 women owned businesses. We expanded  
14 the affordable housing requirement.  
15 We changed the impact to support  
16 that, minority women owned  
17 businesses.

18 We amended the zoning for the  
19 downtown and embraced a lot of the  
20 climate goals and resiliency type  
21 policies. And I know that was not  
22 what Luiz was interested in.

23 So that's how I took it as a  
24 commentary on the direction we were  
25 going.

1 Salgado

2 MR. PHIPPS: You knew that was  
3 not Luiz' what?

4 THE WITNESS: Direction. As I  
5 worked for him for seven and change  
6 years so I knew what was important to  
7 him and I knew that you know those  
8 specific issues were not at the top  
9 of his --

10 MR. PHIPPS: Were not his?

11 THE WITNESS: Were not at the  
12 top of his --

13 MR. PHIPPS: So you guys were  
14 going into a different direction more  
15 to suit the needs how you felt the  
16 community needed?

17 THE WITNESS: Correct. I  
18 thought we were more receptive.

19 MR. PHIPPS: To that change?

20 THE WITNESS: I mean that is  
21 the characteristic of the policies  
22 that we have adopted in the last  
23 year, and I believe that there was a  
24 commentary on that somewhere.

25 He wasn't fully articulate. I

1 Salgado

2 don't know exactly what he meant, but  
3 that's to me what it --

4 Q. Were you under the impression  
5 that the mayor expected you to continue  
6 using Luiz as a consultant or was he  
7 suggesting that you continue to use Luiz as  
8 a consultant?

9 A. Yeah, I do. We had meetings  
10 with the mayor on a regular basis when we  
11 first you know started to -- when Luiz  
12 first retired it was Chuck would invite us  
13 to his weekly meetings with the mayor. And  
14 Kathleen and I would go and you know he  
15 would make comments -- he was a fan --  
16 insinuating like don't throw the baby out  
17 with the bath water type of the some of his  
18 stuff was good and we you know.

19 And so I got the impression  
20 that he was in accordance with a lot of  
21 those policies in the previous direction.  
22 He was a supporter.

23 Q. Now did the conversations with  
24 the mayor about make it right that occurred  
25 when you were actually --

1 Salgado

2 A. Once I was appointed.

3 Q. Once you were appointed?

4 A. Yes.

5 Q. So that's very recent?

6 A. Very recent.

7 Q. But in fact you had canceled  
8 the contract back in September?

9 A. Yes.

10 Q. So this comment comes months  
11 later after it was canceled. After you  
12 became commissioner and you had the  
13 conversation with the mayor, did you renew  
14 the contract?

15 A. No.

16 Q. Did anyone say anything to you  
17 about that?

18 A. No.

19 Q. Did any of the other council  
20 people other than the mayor ever mention  
21 anything to you about using Luiz as a  
22 consultant?

23 A. Not privately, but they made  
24 comments at council meetings.

25 Q. Who said what to whom? That's

1 Salgado

2 better probably. Who said what to whom?

3 A. I believe it was Ivar had said  
4 I hope we are still not using Luiz that way  
5 and looking at how much he was making and  
6 that sort of thing. And actually you know  
7 --

8 MR. PHIPPS: Are you saying  
9 cost was effective? You said how much he  
10 was making.

11 THE WITNESS: He was making. I  
12 don't think that was the only factor.

13 MR. PHIPPS: As a consultant?

14 THE WITNESS: As a consultant.  
15 I think it became unnecessary to  
16 spend any amount of money for that  
17 counsel that we were getting for  
18 those services. Because it is like  
19 we all worked -- I mean, we are not  
20 paying him for context.

21 We all worked here along with  
22 him. He knows the same people that  
23 we know. You know it is not like we  
24 need him to open doors and sort of  
25 broker any sort of transactions to

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happen. It sort of became why are we doing this?

MR. PHIPPS: Redundant.

THE WITNESS: Yes, exactly.

MR. PHIPPS: Unnecessary.

THE WITNESS: Yes, and so that's why the decision was made.

MR. PHIPPS: So who else on the council responded that you can remember?

THE WITNESS: I mean I think when we confirmed that we terminated the contract I was told by several of the council members that that was the right thing to do that. That was what we should have done. I don't want to name names, but Martha had said it -- Lopez -- Ivar said it, Al said it.

MR. PHIPPS: How did the mayor respond?

A. Not, no specific response.

MR. PHIPPS: So you minimized some costs?

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THE WITNESS: Yes. Yes, that's one way of looking at it.

MR. PHIPPS: So you felt obviously very uncomfortable with that dismissal? It was a very uncomfortable position that you were in?

THE WITNESS: It was uncomfortable. It was uncomfortable especially you know we had these weekly meetings and they were you know a source of anxiety. You know usually you have to prepare for the mayor.

MR. PHIPPS: How has it been since then?

THE WITNESS: Since we -- since I was named the commissioner, it has been fine. There has been no other kind of follow-up from the mayor other than the time he came in the day after I was appointed and you know said what he said that about my appointment that he was happy for my

1 Salgado

2 appointment and that I should reach  
3 out to Luiz.

4 Other than that it has been  
5 very much business as usual. We have  
6 had a few council meetings, nothing,  
7 no abrasive interactions or anything.

8 MR. PHIPPS: So do you feel  
9 like you are our man in New Rochelle  
10 now who's guiding us?

11 THE WITNESS: I am.

12 Q. Helping us?

13 A. I'm certainly doing my best and  
14 committed to --

15 MR. BLUMENTHAL: Thank you,  
16 very much. We appreciate it.

17 A. -- trying to make this  
18 development be a good thing for as many  
19 people of the city as possible. That's  
20 what I feel passionate about.

21 MR. BLUMENTHAL: Probably one  
22 of the most important things in the  
23 city right now. So thank you.

24 THE WITNESS: Thank you.

25 MR. MEISELS: Do you gentlemen

1 Salgado

2 have any other questions?

3 MR. BLUMENTHAL: None at all  
4 from me.

5 MR. PHIPPS: I just want to  
6 say --

7 MR. MEISELS: Sure.

8 MR. PHIPPS: I do thank you for  
9 your service. We notice a lot of  
10 stuff going on. Every time I drive  
11 through New Rochelle I see another  
12 building going up. I don't know if  
13 that has to be on the record or not,  
14 but it is very interesting and it was  
15 so interesting that it brought me to  
16 the corner of Fifth and North for  
17 quite some time.

18 And all of a sudden I came by  
19 yesterday and the building was gone.  
20 And it just -- my wife asked me what  
21 is going on in New Rochelle. Do they  
22 have the occupancy? Do they have  
23 enough people to fill the occupancy?  
24 It just is wild, man.

25 THE WITNESS: It is happening.

1 Salgado

2 Of the last report we got on absorb  
3 page which is how we monitor  
4 occupancy or how well the units are  
5 filling up, is about 88 percent of  
6 the units that are coming on line are  
7 being leased.

8 MR. PHIPPS: Are you kidding?  
9 That's to me amazing. I'm probably  
10 going to go off script a little bit  
11 because it is the capacity that my  
12 limited knowledge I don't know where  
13 we are being absorbed. You say it is  
14 88 percent and the buildings are  
15 still being knocked down and going  
16 up. It is like crazy.

17 I would imagine it is helping  
18 the tax base for New Rochelle and  
19 also helping the residents to  
20 minimize on a tax abatement benefit  
21 not to be borne as the sales become  
22 available, is that correct?

23 THE WITNESS: Correct. If you  
24 look at it over time we have pilot  
25 agreements so there is a little bit



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Salgado

of time, what is it 15 more years left?

THE WITNESS: I'm sorry?

MR. PHIPPS: Well I mean the abatement is for the first phase.

THE WITNESS: Well they are not phased. They are 20 year abatements generally the standard abatement is 20. There is some projects that are longer, but roughly most of them are 20 years. It is not so much a phase, but there are bench marks that they have to hit.

So the first bench mark being at year three they have to meet the cost of schools and so there was an analysis done in 2015 where they said you know based on the number of people in a building and the size of the bed room count of the unit, they do a formula and calculate how many children, school aged children are going to attend the schools.

And then that cost we got from

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Salgado

the school district and so we applied the cost to educate those students and we calculate what the minimum tax payment is going to have to be to meet that cost to educate that number of students that are generated and from there it goes -- the abatement schedule continues to full tax at the year 20.

MR. PHIPPS: Better and better for the city.

THE WITNESS: Yes, better for the city.

MR. PHIPPS: Yes. I imagine we benefit paying less taxes.

THE WITNESS: Exactly.

MR. BLUMENTHAL: Less increase in taxes.

MR. PHIPPS: I'm sorry?

MR. BLUMENTHAL: Less increase in taxes.

THE WITNESS: I can't make any representations that the taxes are going to go down.

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Salgado

MR. BLUMENTHAL: You were only there four months. You couldn't have done more with financing.

MR. MEISELS: Is there anything you would like to tell us that we don't know that we ought to know?

THE WITNESS: I don't think so. I feel like I have covered it.

MR. BLUMENTHAL: We should let him go home.

MR. MEISELS: Thank you, very much.

MR. BLUMENTHAL: Thank you, very much.

MR. MEISELS: Thank you very much and good luck.

THE WITNESS: Thank you.

MR. PHIPPS: Wish you success for us.

MR. BLUMENTHAL: For him too.

(Whereupon, at 5:05 P.M., the Examination of this witness was concluded.)

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C E R T I F I C A T E

STATE OF NEW YORK )  
: SS  
COUNTY OF WESTCHESTER )

I, Christine Giustiniani, a Notary Public for and within the State of New York, do hereby certify:

That the witness whose examination is hereinbefore set forth was duly sworn and that such examination is a true record of the testimony given by that witness.

I further certify that I am not related to any of the parties to this action by blood or by marriage and that I am in no way interested in the outcome of this matter.

IN WITNESS WHEREOF, I have hereunto set my hand this 13th day of May, 2022.

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Christine Giustiniani

<b>&amp;</b>	32:8	<b>appointed</b> 4:19 11:7,9,14 12:8 16:16 23:2,3 26:23	<b>bench</b> 31:13,15 <b>benefit</b> 29:20 32:16 <b>benefits</b> 30:18,19 <b>best</b> 27:13 <b>better</b> 24:2 32:11 32:11,13 <b>bit</b> 29:10,25 <b>blood</b> 35:17 <b>blumenthal</b> 2:14 6:21 13:21 14:2,4 14:11 18:4 19:16 27:15,21 28:3 32:18,21 33:2,10 33:14,21 <b>board</b> 1:3 3:20 4:2 4:4,8,11 <b>body</b> 16:12 <b>borne</b> 29:21 <b>brain</b> 18:19 <b>broker</b> 24:25 <b>brought</b> 3:25 28:15 <b>bug</b> 15:17 <b>build</b> 30:20 <b>building</b> 28:12,19 30:15 31:20 <b>buildings</b> 29:14 <b>built</b> 30:12,14 <b>business</b> 3:14 27:5 <b>businesses</b> 20:13 20:17 <b>buzz</b> 15:6,8
<b>&amp;</b> 2:4	<b>abatement</b> 29:20 30:2,14,25 31:6,9	<b>abatement</b> 31:8 <b>abrasive</b> 27:7 <b>absolutely</b> 7:6 <b>absorb</b> 29:2 <b>absorbed</b> 29:13 <b>accused</b> 4:7 <b>acting</b> 11:7,10,12 11:21 <b>action</b> 35:17 <b>actuality</b> 16:14 <b>adam</b> 1:14 3:10 <b>address</b> 3:14 <b>adopted</b> 21:22 <b>adversarial</b> 4:6 <b>advisor</b> 17:5 <b>affordable</b> 20:14 <b>age</b> 7:8 <b>aged</b> 31:23 <b>ago</b> 6:2,3 <b>agreement</b> 14:9 <b>agreements</b> 29:25 <b>ahead</b> 8:21 <b>al</b> 25:19 <b>amazing</b> 29:9 <b>ambitious</b> 7:5 <b>amended</b> 20:18 <b>amount</b> 24:16 <b>analysis</b> 30:9 31:18 <b>announced</b> 9:10 <b>answered</b> 19:12 <b>anxiety</b> 26:13 <b>anybody</b> 4:2 9:6 14:6,17 <b>application</b> 8:4 <b>applied</b> 8:22 32:2 <b>apply</b> 8:10,13,13 9:8 10:6,14 15:2,3 <b>applying</b> 15:25	<b>b</b> <b>baby</b> 22:16 <b>back</b> 6:15 23:8 <b>ball</b> 4:10 <b>base</b> 29:18 <b>based</b> 31:19 <b>basis</b> 14:10 22:10 <b>bath</b> 22:17 <b>becoming</b> 7:13,20 <b>bed</b> 31:21 <b>behalf</b> 3:3 <b>believe</b> 5:22 21:23 24:3
<b>1</b>			<b>c</b>
<b>10604</b> 2:7 <b>10801</b> 1:10 3:16 <b>1133</b> 2:6 <b>13th</b> 35:21 <b>15</b> 31:2 <b>18</b> 5:8,22			<b>c</b> 2:2 35:2,2 <b>calculate</b> 31:22 32:4 <b>call</b> 16:22 17:15,16 17:17 18:9 19:9 19:12,19
<b>2</b>			
<b>2</b> 1:11 <b>20</b> 5:21 6:5 30:7 31:8,10,12 32:10 <b>2014</b> 5:4,8 <b>2015</b> 31:18 <b>2018</b> 5:22 <b>2021</b> 9:4 <b>2022</b> 1:11 6:7 35:21 <b>28</b> 30:14 <b>2nd</b> 6:6			
<b>3</b>			
<b>391-3690</b> 2:9 <b>3rd</b> 6:6			
<b>4</b>			
<b>4:00</b> 1:12			
<b>5</b>			
<b>515</b> 1:9 3:15 <b>5:05</b> 33:22			
<b>8</b>			
<b>80</b> 30:13 <b>88</b> 29:5,14			
<b>9</b>			
<b>914</b> 2:9			
<b>a</b>			

<p><b>called</b> 3:2 15:2 18:7 <b>calling</b> 18:3 <b>canceled</b> 23:7,11 <b>capacity</b> 29:11 <b>captioned</b> 1:15 <b>career</b> 10:10 <b>certain</b> 16:9 30:6 <b>certainly</b> 14:25 27:13 <b>certify</b> 35:10,15 <b>change</b> 21:5,19 <b>changed</b> 20:15 <b>changes</b> 16:7 <b>characteristic</b> 21:21 <b>charge</b> 6:11 <b>charges</b> 3:24 <b>charles</b> 2:13 <b>charter</b> 4:18 <b>children</b> 31:23,23 <b>christine</b> 1:16 35:8 35:24 <b>chuck</b> 8:3,15,15 11:22,24 12:5,9,13 14:24 15:2 22:12 <b>citizen</b> 4:3 <b>city</b> 1:2 3:3,12 4:19,22,24 5:11 6:25 14:3,23 27:19,23 32:12,14 <b>climate</b> 10:12 20:20 <b>code</b> 4:3 <b>come</b> 5:15 6:15 16:17 <b>comes</b> 18:9 23:10 <b>coming</b> 18:15 29:6 <b>comment</b> 23:10 <b>commentary</b> 20:24 21:24</p>	<p><b>comments</b> 22:15 23:24 <b>commissioner</b> 3:11,19 5:18,24,25 6:10,16,17 7:10,14 7:20 8:5 9:13 10:4 10:24 11:8,10,13 11:13,21 12:8,17 14:19,24 15:4 23:12 26:19 <b>commitments</b> 20:12 <b>committed</b> 27:14 <b>committee</b> 2:5,13 2:14 <b>community</b> 14:22 21:16 <b>competition</b> 9:17 10:9 <b>complaint</b> 1:7 3:22 4:4,17,21 <b>concept</b> 7:13 <b>concerned</b> 8:16,19 8:23 10:7 16:3,4 16:12 <b>concerns</b> 15:24 <b>concluded</b> 33:24 <b>confirmed</b> 25:13 <b>congratulatory</b> 17:17 <b>connections</b> 13:8 <b>consultant</b> 9:20 10:16 12:11,18,24 13:2 22:6,8 23:22 24:13,14 <b>context</b> 24:20 <b>contexts</b> 19:3 <b>continue</b> 9:23 22:5 22:7 <b>continues</b> 32:9</p>	<p><b>continuing</b> 20:5 <b>contract</b> 13:19,22 14:7 17:6 18:24 23:8,14 25:14 <b>contracts</b> 13:9 <b>contrary</b> 4:18 <b>conversation</b> 9:2 15:9 23:13 <b>conversations</b> 7:12,19,22 9:6 14:17 17:10 22:23 <b>convey</b> 10:23 <b>convince</b> 16:10 <b>corner</b> 28:16 <b>correct</b> 5:23 11:15 21:17 29:22,23 <b>cost</b> 24:9 31:17,25 32:3,6 <b>costs</b> 25:25 <b>council</b> 16:6,10 23:19,24 25:10,15 27:6 <b>counsel</b> 17:5 24:17 <b>count</b> 31:21 <b>counting</b> 5:9 <b>county</b> 35:5 <b>court</b> 3:7,13 <b>covered</b> 33:9 <b>cox</b> 1:7 3:22 4:17 <b>crazy</b> 29:16 <b>credit</b> 7:3</p> <hr/> <p style="text-align: center;"><b>d</b></p> <hr/> <p><b>d</b> 3:2,2 <b>david</b> 2:14 <b>dawn</b> 2:17 <b>day</b> 7:8 26:23 35:21 <b>dealing</b> 9:6 <b>decision</b> 25:8 <b>decisions</b> 13:14</p>	<p><b>definitely</b> 16:3,4 19:14 <b>delighted</b> 16:20 <b>department</b> 2:16 5:14 6:13 9:21,23 10:18 11:4,5,12,25 12:11,15 13:10 20:2 <b>deputy</b> 4:24 5:18 5:20,21 6:10,16,17 7:10,16 12:16 <b>desire</b> 14:23 <b>despite</b> 16:19 <b>developers</b> 13:8 13:11 <b>development</b> 3:11 5:14,18,19 6:15 7:8,11,14,20 8:5 9:13 12:9 20:10 27:18 30:12,25 <b>dicker</b> 2:4 <b>different</b> 19:2 21:14 <b>direction</b> 19:23 20:24 21:4,14 22:21 <b>directly</b> 9:9 <b>disclosure</b> 6:20 <b>discussions</b> 11:18 <b>dismissal</b> 26:6 <b>district</b> 32:2 <b>diversity</b> 20:6 <b>doing</b> 4:8 25:3 27:13 <b>doors</b> 24:24 <b>downstairs</b> 6:11 <b>downtown</b> 20:19 <b>drive</b> 28:10 <b>duly</b> 3:4 35:12 <b>dwindled</b> 13:6</p>
---	---	--	---

<p><b>e</b></p> <p>e 2:2,2 35:2,2  <b>early</b> 15:11  <b>earnest</b> 13:7  <b>easy</b> 19:9  <b>economic</b> 7:10  <b>edelman</b> 2:4  <b>educate</b> 32:3,6  <b>effective</b> 24:9  <b>effort</b> 4:19  <b>effusive</b> 17:25  <b>eight</b> 5:5,5  <b>either</b> 19:18  <b>elser</b> 2:4  <b>embodied</b> 19:25  <b>embraced</b> 20:19  <b>employed</b> 5:3  <b>encouraged</b> 8:12  14:25  <b>ended</b> 14:7  <b>enjoy</b> 14:14  <b>especially</b> 26:11  <b>esq</b> 2:8,17  <b>essentially</b> 12:20  <b>establish</b> 13:13  <b>ethics</b> 1:3,7 2:5,13  2:14 3:20 4:3  <b>exactly</b> 10:25 22:2  25:5 32:17  <b>examination</b> 1:14  3:17 33:23 35:11  35:13  <b>examined</b> 3:6  <b>expand</b> 20:6,7  <b>expanded</b> 20:13  <b>expected</b> 22:5  <b>experience</b> 6:22  <b>expire</b> 17:6  <b>explain</b> 7:25  <b>expressed</b> 14:23</p>	<p><b>f</b></p> <p>f 35:2  <b>fact</b> 23:7  <b>factor</b> 24:12  <b>fan</b> 22:15  <b>feel</b> 18:6,11 27:8  27:20 33:9  <b>felt</b> 17:8 19:13  20:9 21:15 26:4  <b>fifth</b> 28:16  <b>filed</b> 3:22,25  <b>fill</b> 28:23  <b>filling</b> 29:5  <b>finally</b> 8:14  <b>finance</b> 6:10,12,19  <b>financing</b> 33:4  <b>fine</b> 26:20  <b>firm</b> 8:7,9  <b>first</b> 3:4 5:11 6:9  9:10 12:6 15:13  18:7 20:4 22:11  22:12 30:3,22,23  30:24 31:6,15  <b>five</b> 30:10  <b>florida</b> 14:14  <b>follow</b> 26:21  <b>follows</b> 3:6  <b>forgot</b> 4:14  <b>formula</b> 31:22  <b>forth</b> 35:12  <b>forward</b> 18:12  <b>found</b> 8:6  <b>four</b> 6:18,24 33:3  <b>frame</b> 7:15  <b>free</b> 4:12  <b>friends</b> 14:21  <b>full</b> 6:19 30:7 32:9  <b>fully</b> 21:25 30:14  <b>fun</b> 7:7  <b>funding</b> 16:9</p>	<p><b>further</b> 35:15</p> <p><b>g</b></p> <p>g 3:2  <b>generally</b> 31:9  <b>generated</b> 32:7  <b>gentlemen</b> 27:25  <b>getting</b> 24:17  <b>giustiniani</b> 1:17  35:8,24  <b>give</b> 6:19 7:3  <b>given</b> 15:23 35:14  <b>giving</b> 14:13  <b>go</b> 6:12 16:5 22:14  29:10 30:5 32:25  33:11  <b>goals</b> 20:20  <b>goes</b> 32:8  <b>going</b> 4:9,11 7:7  8:4,7,8 9:20,22  11:2 12:10,15,16  14:18 15:7,18  16:13 18:12 19:8  19:24 20:25 21:14  28:10,12,21 29:10  29:15 31:24 32:5  32:25  <b>good</b> 9:14 22:18  27:18 33:17  <b>gossip</b> 15:21,23  <b>great</b> 7:2  <b>ground</b> 19:14  <b>guess</b> 8:19  <b>guiding</b> 27:10  <b>guys</b> 14:12 21:13</p> <p><b>h</b></p> <p>hand 35:21  <b>happen</b> 25:2  <b>happening</b> 28:25  <b>happy</b> 26:25</p>	<p><b>hard</b> 19:4  <b>hat</b> 9:12,12  <b>head</b> 5:10 10:13  16:11  <b>hear</b> 15:17 17:11  <b>heard</b> 15:24 16:18  16:19  <b>held</b> 1:15  <b>helping</b> 18:16  27:12 29:17,19  <b>hereinbefore</b>  35:12  <b>hereunto</b> 35:20  <b>hhm</b> 11:17  <b>high</b> 18:15  <b>hire</b> 8:7,9  <b>hired</b> 6:12  <b>history</b> 13:10  <b>hit</b> 31:14  <b>hold</b> 4:20 5:12  <b>home</b> 33:11  <b>honestly</b> 15:22  19:10  <b>hope</b> 24:4  <b>hopeful</b> 15:4  <b>hot</b> 10:5  <b>housing</b> 20:14</p> <p><b>i</b></p> <p>idea 9:14 10:5,23  11:19 14:6  <b>imagine</b> 29:17  32:15  <b>impact</b> 20:15  <b>important</b> 21:6  27:22  <b>impression</b> 22:4  22:19  <b>increase</b> 32:18,21  <b>increment</b> 30:6  <b>influence</b> 4:22</p>
--	--	---	--

<p><b>informal</b> 4:16  <b>information</b> 8:21  13:17  <b>inject</b> 18:19  <b>insinuating</b> 22:16  <b>instruction</b> 18:15  19:20  <b>intention</b> 12:14  <b>interactions</b> 27:7  <b>interested</b> 20:22  35:18  <b>interesting</b> 6:24  17:11 28:14,15  <b>interim</b> 12:8,17  <b>introduce</b> 16:8  <b>investigates</b> 4:5  <b>investigating</b> 3:21  <b>investigation</b> 3:24  <b>invite</b> 22:12  <b>issued</b> 15:14,16  <b>issues</b> 21:8  <b>ivar</b> 24:3 25:19</p>	<p><b>knocked</b> 29:15  <b>know</b> 3:21 4:15  7:5 10:21 12:6  13:14 14:21,22  15:18,20 16:4,5,18  17:4,9 18:24,25  19:3,4,5,12 20:2  20:11,21 21:7  22:2,11,14,18 24:6  24:23,23 26:11,13  26:13,24 28:12  29:12 31:19 33:7  33:7  <b>knowledge</b> 17:7  29:12  <b>knows</b> 24:22</p>	<p><b>luck</b> 33:17  <b>luiz</b> 9:25 10:3  11:23 12:2,10,18  13:15 16:22 17:3  17:10,15,17 18:6  18:22,24 19:25  20:22 21:3 22:6,7  22:11 23:21 24:4  27:3</p>	<p>23:24 26:12 27:6  <b>meisels</b> 2:8 3:18  3:20 17:21,23  27:25 28:7 33:5  33:12,16  <b>member</b> 2:13,14  <b>members</b> 4:11  25:15  <b>mention</b> 23:20  <b>mentioned</b> 8:15,15  8:23 9:11,19  11:23 12:9  <b>merely</b> 18:17  <b>met</b> 12:5  <b>minimize</b> 29:20  <b>minimized</b> 25:24  <b>minimum</b> 32:4  <b>minority</b> 20:12,16  <b>money</b> 24:16  <b>monitor</b> 29:3  <b>month</b> 5:25 6:3,18  14:9,10,12 16:5  <b>months</b> 6:14,24  23:10 33:3  <b>morning</b> 16:17  <b>moskowitz</b> 2:4</p>
<p><b>j</b></p>	<p><b>l</b></p>	<p><b>m</b></p>	<p><b>n</b></p>
<p><b>job</b> 8:18,22,24  15:7,12,25 18:16  <b>joined</b> 5:11</p>	<p><b>l</b> 3:2  <b>law</b> 2:16  <b>leadership</b> 12:19  <b>leads</b> 15:15  <b>leased</b> 29:7  <b>left</b> 17:8 30:23  31:3  <b>likeable</b> 17:20  18:3  <b>limited</b> 29:12  <b>line</b> 29:6  <b>little</b> 5:4,5 18:2  29:10,25  <b>llp</b> 2:4  <b>long</b> 5:2 12:21  18:24  <b>longer</b> 31:11  <b>look</b> 29:24  <b>looking</b> 20:6 24:5  26:3  <b>lopez</b> 25:19  <b>lot</b> 7:3 13:10 20:19  22:20 28:9</p>	<p><b>m</b> 3:2  <b>making</b> 18:8 19:17  24:5,10,11  <b>man</b> 27:9 28:24  <b>manager</b> 4:20,23  4:24 5:13  <b>mark</b> 31:15  <b>marks</b> 31:13  <b>marriage</b> 35:17  <b>martha</b> 25:18  <b>math</b> 5:10  <b>matter</b> 1:15 35:19  <b>mayor</b> 4:18,22  7:12 8:17,24 9:7  9:22 10:18,24  11:2 12:12 15:7  16:2,11,16 17:11  18:7 19:17,22  22:5,10,13,24  23:13,20 25:21  26:15,21  <b>mean</b> 13:2 14:3,20  14:20 15:6,8 17:2  18:10 20:3 21:20  24:19 25:12 31:5  <b>meant</b> 22:2  <b>meet</b> 30:4 31:16  32:6  <b>meeting</b> 13:4  <b>meetings</b> 10:20,21  10:22 22:9,13</p>	<p><b>n</b> 2:2  <b>name</b> 3:8,19 9:11  25:18  <b>named</b> 11:20  26:19  <b>names</b> 25:18  <b>need</b> 16:21 24:24  30:5  <b>needed</b> 21:16  <b>needs</b> 21:15  <b>new</b> 1:2,10,18 2:7  2:16 3:3,5,12,16  3:16 5:3 6:25  11:13 16:8 27:9</p>
<p><b>k</b></p>	<p><b>k</b></p>	<p><b>k</b></p>	<p><b>k</b></p>
<p><b>kathleen</b> 8:3 9:21  10:17 11:3,7,9,20  11:22 12:7,12,17  13:6,24 14:24,25  20:4 22:14  <b>keep</b> 10:13  <b>kidding</b> 29:8  <b>kind</b> 4:4 20:6  26:21  <b>knew</b> 13:11 14:25  18:22 19:8 21:2,6  21:7</p>	<p><b>k</b></p>	<p><b>k</b></p>	<p><b>k</b></p>

<p>28:11,21 29:18 35:4,9 <b>north</b> 1:9 3:15 28:16 <b>notary</b> 1:17 3:4 35:8 <b>notice</b> 14:13 28:9 <b>notified</b> 8:3 <b>number</b> 31:19 32:6 <b>ny</b> 1:10</p>	<p><b>part</b> 19:16 <b>parties</b> 35:16 <b>passed</b> 13:17 <b>passionate</b> 27:20 <b>paying</b> 24:20 32:16 <b>payment</b> 32:5 <b>people</b> 7:23 14:21 23:20 24:22 27:19 28:23 31:20 <b>perceived</b> 9:17 10:9 <b>percent</b> 29:5,14 30:13 <b>period</b> 6:18 30:25 <b>person</b> 17:5 <b>peter</b> 2:8 3:19 <b>peter.meisels</b> 2:10 <b>phase</b> 30:22,24,24 31:6,12 <b>phased</b> 31:8 <b>phipp</b> 2:13 12:3 17:18 21:2,10,13 21:19 24:8,13 25:4,6,9,21,24 26:4,16 27:8 28:5 28:8 29:8 30:22 31:5 32:11,15,20 33:19 <b>pilot</b> 29:24 30:21 <b>pilots</b> 30:10 <b>place</b> 1:16 9:2 <b>plains</b> 2:7 <b>planned</b> 12:14 <b>please</b> 3:7,13 <b>point</b> 19:22 <b>policies</b> 20:21 21:21 22:21 <b>population</b> 20:8 <b>position</b> 4:20 5:12 8:6 9:8,13 15:4</p>	<p>26:7 <b>possibility</b> 9:7 <b>possible</b> 27:19 <b>post</b> 12:2 <b>posting</b> 15:12,13 <b>predecessor</b> 9:10 9:25 <b>prepare</b> 26:14 <b>present</b> 2:12 <b>presentations</b> 16:6 <b>previous</b> 6:17 13:15 22:21 <b>previously</b> 20:8 <b>privately</b> 23:23 <b>probably</b> 24:2 27:21 29:9 <b>proceeding</b> 4:7 <b>procurement</b> 6:11 <b>programs</b> 16:8 <b>projects</b> 31:10 <b>promoted</b> 6:9 <b>promotion</b> 5:16,17 <b>property</b> 30:17 <b>proud</b> 19:3 <b>public</b> 1:17 3:5 35:9 <b>publicly</b> 8:17 <b>purely</b> 3:23 <b>purview</b> 13:16 <b>put</b> 9:11 15:25</p>	<p><b>ran</b> 19:25 <b>rate</b> 7:6,9 <b>reach</b> 27:2 <b>reading</b> 19:20,21 <b>real</b> 30:19 <b>really</b> 13:12 20:5 <b>recall</b> 9:5 15:11 <b>receptive</b> 21:18 <b>record</b> 3:9 28:13 35:13 <b>recruitment</b> 8:7,9 <b>recurring</b> 10:21 <b>redundant</b> 25:4 <b>regular</b> 22:10 <b>related</b> 14:18 35:16 <b>relating</b> 11:19 <b>relationships</b> 13:13 <b>relied</b> 13:17 <b>relying</b> 17:4 <b>remain</b> 11:12 <b>remained</b> 13:2 <b>remaining</b> 12:24 <b>remember</b> 15:9 25:11 <b>renew</b> 23:13 <b>repeat</b> 12:3 <b>report</b> 29:2 <b>reporter</b> 3:7,13 <b>reporting</b> 12:19 <b>represent</b> 3:20 <b>representations</b> 32:24 <b>request</b> 16:8 <b>requirement</b> 20:14 <b>residents</b> 29:19 <b>resiliency</b> 20:20 <b>respond</b> 25:22</p>
<b>o</b>			
<p><b>o</b> 3:2 <b>obviously</b> 26:5 <b>occasion</b> 7:11 <b>occupancy</b> 28:22 28:23 29:4 <b>occupied</b> 19:7 <b>occurred</b> 22:24 <b>odds</b> 16:2 <b>office</b> 16:17 <b>oh</b> 6:3 <b>okay</b> 4:8 10:19 14:11 <b>once</b> 13:6,7,16 23:2,3 <b>open</b> 14:6 24:24 <b>operations</b> 5:13 <b>opportunities</b> 20:7 <b>originally</b> 6:9 8:8 <b>ought</b> 33:7 <b>outcome</b> 35:18 <b>oversaw</b> 19:6 <b>owes</b> 17:15 <b>owned</b> 20:13,16</p>			
<b>p</b>			
<p><b>p</b> 2:2,2 <b>p.m.</b> 1:12 33:22 <b>page</b> 29:3</p>			
		<b>q</b>	
		<p><b>question</b> 4:23 <b>questions</b> 4:10,12 28:2 <b>quickly</b> 30:18 <b>quite</b> 4:16 28:17</p>	
		<b>r</b>	
		<p><b>r</b> 2:2 35:2 <b>ramp</b> 30:3</p>	

<p><b>responded</b> 25:10  <b>response</b> 25:23  <b>resume</b> 8:14  <b>retail</b> 30:17  <b>retained</b> 9:19              10:16  <b>retainer</b> 14:8  <b>retired</b> 6:17 9:20              9:24 11:6 22:12  <b>retirement</b> 9:10              10:12 12:2  <b>right</b> 4:17 15:14              16:23 17:12 18:8              22:24 25:16 27:23  <b>ring</b> 9:12  <b>robert</b> 1:7 3:22  <b>rochelle</b> 1:2,10              2:16 3:3,12,16 5:3              6:25 27:9 28:11              28:21 29:18  <b>role</b> 12:19 19:7  <b>rolling</b> 4:10  <b>room</b> 31:21  <b>rough</b> 30:9  <b>roughly</b> 31:11  <b>run</b> 9:21 10:18              11:4,5,25 12:11              14:5  <b>running</b> 9:23              12:15</p>	<p>20:1 21:1 22:1          23:1 24:1 25:1          26:1 27:1 28:1          29:1 30:1 31:1          32:1 33:1  <b>saying</b> 24:8  <b>schedule</b> 30:2 32:9  <b>school</b> 30:5 31:23              32:2  <b>schools</b> 31:17,24  <b>script</b> 29:10  <b>scuttle</b> 15:17  <b>second</b> 4:21 15:15  <b>secondarily</b> 18:9  <b>see</b> 19:5 28:11              30:18  <b>segments</b> 20:7  <b>send</b> 18:4  <b>separated</b> 20:9  <b>september</b> 9:4              13:3,20 23:8  <b>served</b> 7:9  <b>service</b> 28:9  <b>services</b> 18:14              24:18  <b>set</b> 10:20 18:5              35:12,21  <b>seven</b> 21:5  <b>sits</b> 16:11  <b>six</b> 6:14  <b>size</b> 31:20  <b>somebody</b> 9:18  <b>sorry</b> 12:4 31:4              32:20  <b>sort</b> 3:25 12:6 13:5              13:16,16,17 15:16              15:21 16:9 20:3,9              24:6,24,25 25:2              30:9  <b>source</b> 26:13</p>	<p><b>sources</b> 15:18  <b>specific</b> 15:9,22              19:22 21:8 25:23  <b>specifically</b> 15:3  <b>spend</b> 24:16  <b>ss</b> 35:4  <b>stage</b> 10:10  <b>stand</b> 19:13  <b>standard</b> 31:9  <b>started</b> 5:4,9 13:6              13:7 15:16 22:11  <b>state</b> 1:17 3:5,8,14              35:4,9  <b>stated</b> 11:24  <b>step</b> 19:6  <b>stepping</b> 20:11  <b>store</b> 30:17  <b>story</b> 30:15  <b>straight</b> 18:5  <b>students</b> 32:3,7  <b>stuff</b> 22:18 28:10  <b>submit</b> 8:4,14  <b>success</b> 33:19  <b>successor</b> 10:9  <b>sudden</b> 28:18  <b>suggested</b> 9:15  <b>suggesting</b> 22:7  <b>suggestion</b> 18:17              19:18  <b>suit</b> 21:15  <b>support</b> 12:16              20:15  <b>supporter</b> 22:22  <b>supposed</b> 18:13  <b>sure</b> 7:6 8:2 28:7  <b>sworn</b> 3:4 35:12</p>	<p><b>taxes</b> 30:7,11,15              32:16,19,22,24  <b>tell</b> 4:12,13 15:3              18:3 33:6  <b>ten</b> 10:11  <b>tenure</b> 20:3  <b>terminated</b> 13:19              13:22 18:23 25:13  <b>terms</b> 12:24 14:22  <b>testified</b> 3:6  <b>testimony</b> 35:14  <b>thank</b> 14:2,13              17:22 18:2 27:15              27:23,24 28:8              33:12,14,16,18  <b>thing</b> 24:6 25:16              27:18  <b>things</b> 15:19 16:9              27:22  <b>think</b> 4:14,14 9:14              10:5 13:3 14:16              15:20 16:21,22              17:8,14,15 18:12              24:12,15 25:12              33:8  <b>thinking</b> 14:5              18:20,21  <b>thought</b> 21:18  <b>three</b> 9:22 30:3              31:16  <b>throw</b> 9:12 22:16  <b>time</b> 1:16 5:15 7:9              7:15,18 18:20,25              26:22 28:10,17              29:24 31:2  <b>title</b> 3:8 7:4  <b>told</b> 8:9,12 10:4,15              17:15,19 25:14  <b>top</b> 21:8,12  <b>totally</b> 6:8</p>
<p style="text-align: center;"><b>s</b></p>			
<p><b>s</b> 2:2 3:2  <b>safer</b> 10:13  <b>sage</b> 17:5  <b>sales</b> 29:21  <b>salgado</b> 1:14 3:1              3:10 4:1 5:1 6:1              7:1 8:1 9:1 10:1              11:1 12:1 13:1              14:1 15:1 16:1              17:1 18:1 19:1</p>			
		<b>t</b>	
		<p><b>t</b> 35:2,2  <b>take</b> 9:2  <b>tax</b> 29:18,20 32:4              32:9</p>	

<p><b>tough</b> 16:13  <b>transactions</b> 24:25  <b>treat</b> 8:17  <b>true</b> 17:21 35:13  <b>trying</b> 27:17  <b>type</b> 17:5 20:20                  22:17</p>	<p><b>weekly</b> 22:13                  26:12  <b>weeks</b> 8:11 12:7  <b>weird</b> 18:2  <b>went</b> 8:21  <b>westchester</b> 2:6                  35:5  <b>whereof</b> 35:20  <b>white</b> 2:7  <b>wife</b> 28:20  <b>wild</b> 28:24  <b>wilson</b> 2:4  <b>wilsonelser.com</b>                  2:10  <b>wish</b> 33:19  <b>witness</b> 3:2,10,15                  13:24 14:3,8,15                  17:19,22,24 18:21                  19:21 21:4,11,17                  21:20 24:11,14                  25:5,7,12 26:2,9                  26:18 27:11,24                  28:25 29:23 31:4                  31:7 32:13,17,23                  33:8,18,23 35:11                  35:14,20  <b>women</b> 20:13,16  <b>word</b> 13:23  <b>words</b> 16:21 18:8  <b>work</b> 6:12 10:17                  11:2 15:20 16:15  <b>worked</b> 18:25 21:5                  24:19,21  <b>working</b> 13:7</p>	<p>31:8,16 32:10  <b>years</b> 5:5,6 10:11                  19:2 21:6 30:4,7                  30:10,23 31:2,12  <b>yesterday</b> 28:19  <b>york</b> 1:18 2:7 3:5                  3:16 35:4,10</p>
<b>u</b>	<b>z</b>	
<p><b>uhm</b> 11:17  <b>uncomfortable</b>                  18:6,22 19:10,11                  19:15 26:5,7,10,10  <b>understand</b> 16:25  <b>understood</b> 11:11  <b>unit</b> 31:21  <b>units</b> 29:4,6  <b>unnecessary</b> 24:15                  25:6  <b>upset</b> 17:3,9 18:23  <b>use</b> 18:8,13 22:7  <b>usual</b> 27:5  <b>usually</b> 26:14  <b>utility</b> 13:5  <b>utilizing</b> 17:7</p>	<p><b>z</b> 10:3  <b>zoning</b> 16:7 20:18</p>	
<b>v</b>		
<p><b>variety</b> 15:17 16:7  <b>view</b> 19:23  <b>vision</b> 11:25  <b>vulnerable</b> 9:17</p>		
<b>w</b>		
<p><b>want</b> 5:22 6:19 9:7                  16:8 18:18 25:18                  28:5  <b>wanted</b> 7:4 8:20                  8:24 9:11 15:7  <b>warren</b> 2:17  <b>water</b> 22:17  <b>way</b> 12:14 24:4                  26:3 35:18</p>	<p style="text-align: center;"><b>x</b></p> <p><b>x</b> 1:4,8 14:13</p> <p style="text-align: center;"><b>y</b></p> <p><b>yeah</b> 5:22 22:9  <b>year</b> 5:24 13:3                  15:11 20:4 21:23</p>	