

Deposition of:

Traci Theis

February 17, 2020

CITY OF MADEIRA

v.

PHILIP DOUGLAS OPPENHEIMER

Cause No. A1802415



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COURT OF COMMON PLEAS
HAMILTON COUNTY, OHIO

_____)	
CITY OF MADEIRA,)	
)	
Plaintiff,)	
)	Case No.
vs.)	A1802415
)	
PHILIP DOUGLAS OPPENHEIMER,)	
)	
Defendant.)	
_____)	

Deposition of: TRACI THEIS

Pursuant to: Notice

Date and Time: Monday, February 17, 2020
1:59 p.m.

Place: Finney Law Firm, LLC
1077 Celestial Street
Suite 10
Cincinnati, Ohio 45202

Reporter: Tracy L. Allen, RPR, RMR
Notary Public - State of Ohio

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2

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16 Also present:

17 Philip Douglas Oppenheimer

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1 TRACI THEIS
2 a witness herein, having been duly sworn, was
3 examined and deposed as follows:

4 EXAMINATION

5 BY MR. HARTMAN:

6 Q. Good afternoon, Ms. Theis.

7 A. Good afternoon.

8 Q. I introduced myself when we just met
9 a few minutes ago. I'm Curt Hartman. I'm
10 representing Mr. Oppenheimer in a lawsuit
11 that's been filed against him by the City of
12 Madeira.

13 We're here to take your deposition,
14 trying to figure out what you know and answer
15 my questions. I don't anticipate being all
16 that long, but I want to check before we get
17 going, have you ever had your deposition taken
18 previously?

19 A. I think we -- that's what we were
20 talking about. I think I had it taken when I
21 was a teenager working at The Beach Waterpark.

22 Q. Okay.

23 MR. ROBERTS: Hold on a second.

24 Are you recording this?

25 MR. OPPENHEIMER: No.

1 MR. ROBERTS: Okay.

2 MR. OPPENHEIMER: Did you think I
3 was?

4 MR. HARTMAN: No. I just asked a
5 question.

6 Go ahead.

7 MR. OPPENHEIMER: No.

8 MR. HARTMAN: But it's permissible
9 to record since the notice included audio
10 recording.

11 BY MR. HARTMAN:

12 Q. Okay. Let me just kind of go
13 through some of the ground rules with you in
14 terms of a deposition. I'm sure your attorney
15 went over them a little bit.

16 Since we're having a court reporter
17 here transcribing everything that's being
18 spoken here today, we need to first try to make
19 sure only one of us is speaking at a time. So
20 if you try to make sure I'm finishing my
21 question, I'll try to make sure I let you
22 finish your answer before I start the next
23 question.

24 Because she is transcribing what we
25 say, any responses need to -- ensure you have

1 affirmative yes or no answer as opposed to a
2 grunt noise or shaking of the head. I'll try
3 to pick it up if you do it. It's natural to do
4 it, but don't feel bad about that. I or the
5 court reporter will probably pick up if you do
6 it.

7 If you don't understand a question
8 I'm asking, feel free to ask me to clarify. I
9 can do that for you.

10 If you need to take a break, feel
11 free to ask for a break. I would ask if a
12 question is pending, that you answer the
13 question before we take a break. Like I said,
14 I do not anticipate being all that long.

15 And there's always a few ground
16 rules that I always tend to forget before -- as
17 I'm going through this, but we'll figure them
18 out as we go through here today.

19 For the record, could you state your
20 name and your address, please?

21 A. Traci Theis, 6945 Pineneedle Lane,
22 Cincinnati, Ohio 45243.

23 Q. And you live in the City of Madeira?

24 A. Yes, I do.

25 Q. And you're on the Madeira City

1 Council?

2 A. I am.

3 Q. How long have you served on the
4 Madeira City Council?

5 A. Let's see. December of 2013.

6 Q. To the present?

7 A. To the present.

8 Q. Correct.

9 A. Correct. My term ends 2021.

10 Q. And it's my understanding that the
11 mayor of the City of Madeira is selected from
12 amongst the council members?

13 A. Correct.

14 Q. And you did serve as mayor during a
15 certain period of time?

16 A. I did.

17 Q. What period of time was that?

18 A. 2017. So December 1st of 2017 to
19 November 30th, unless there's a 31st in
20 November.

21 Q. No.

22 A. -- 30th of 2019.

23 Q. And the mayor is a voting member of
24 council; is that correct?

25 A. Correct.

1 Q. Does the mayor usually not vote
2 unless there's a tie, or does the mayor
3 generally always vote?

4 A. The mayor always votes, unless they
5 recuse themselves for some kind of conflict of
6 interest or -- just like any other council
7 member. It's just another council member.

8 Q. All right. As I indicated, we're
9 here to talk about the lawsuit that the City of
10 Madeira has filed against Mr. Oppenheimer.

11 You're generally familiar with that
12 lawsuit --

13 A. Correct.

14 Q. -- attempting to have him declared a
15 vexatious litigator?

16 A. Correct.

17 Q. When did you first become aware that
18 the lawsuit had been filed against Mr.
19 Oppenheimer?

20 A. I don't recall the exact date.

21 Q. Okay. I'm going to hand you what is
22 being marked as Exhibit 1.

23 (Defendant's Exhibit 1 was marked for
24 identification.)

25 BY MR. HARTMAN:

1 Q. And I'll represent to you this is a
2 copy of the original complaint that was
3 filed --

4 A. Okay.

5 Q. -- on behalf of the City of Madeira
6 with the Hamilton County Common Pleas Court.

7 It indicates it was electronically
8 filed on May 11th, 2018 at 4:51 p.m.

9 A. Okay.

10 Q. Were you aware that it was being
11 filed before it was actually filed?

12 A. I know that we explored filing it
13 and we rely on our legal counsel. You know,
14 most of -- most of our council people are,
15 basically, volunteers in the community and we
16 rely on legal.

17 So we had a proclamation and we
18 talked about it at council. I don't recall the
19 exact date. So I'm sure it's before this was
20 filed.

21 And we, basically, gave legal
22 counsel the authority to explore the lawsuit.
23 And that was during regular council session.

24 MR. ROBERTS: Traci, listen to the
25 question. Just answer the question.

1 THE WITNESS: Okay. Sorry.

2 MR. ROBERTS: No worries.

3 BY MR. HARTMAN:

4 Q. When you say we explored filing it,
5 we rely on legal counsel, we gave legal counsel
6 authority to explore the lawsuit; who is we?

7 A. Council.

8 Q. The seven members of council?

9 A. Uh-huh.

10 Q. Collectively?

11 A. Uh-huh.

12 Q. Is that a yes?

13 A. Yes.

14 (Defendant's Exhibit 2 was marked for
15 identification.)

16 BY MR. HARTMAN:

17 Q. I'm going to hand you what's been
18 marked as Exhibit 2.

19 And do you recognize these as being
20 the official minutes of the Madeira City
21 Council Meeting from April 23, 2018?

22 A. That's what it says, yes.

23 Q. Okay. If you would, go to page 6 of
24 6 in the top left. There's an indication of a
25 signature of Christine Doyle as clerk of

1 council at the bottom.

2 Do you see that signature?

3 A. I do.

4 Q. Do you recognize that as her
5 signature?

6 A. I can't tell you what her
7 signature -- I mean, I assume that's her
8 signature, yes. She signed it.

9 Q. Okay.

10 A. I don't have her signature
11 memorized.

12 Q. Now, if I can go to the first page,
13 and it says under item Roman numeral IV,
14 Acceptance of the Agenda and Minutes. There's
15 an indication of category 1 under there,
16 Changes to the agenda. It says Mr. Fox asked
17 to add Proclamation 18-01 to New Business.

18 Do you see that?

19 A. Yes.

20 Q. When Mr. Fox asked that during that
21 council meeting to add Proclamation 18-01 to
22 new business, did you know what Proclamation
23 18-01 was?

24 A. I don't recall.

25 Q. Do you recall if anybody asked

1 Mr. Fox, what is Proclamation 18-01?

2 A. I don't recall.

3 (Defendant's Exhibit 3 was marked for
4 identification.)

5 BY MR. HARTMAN:

6 Q. I'm going to hand you what's been
7 marked as Exhibit 3.

8 A. Okay.

9 Q. Do you recognize this as being
10 Proclamation 18-01?

11 A. Yeah.

12 Q. And that is your signature at the
13 bottom?

14 A. It is. I can guarantee you that's
15 my signature.

16 Q. Say again.

17 A. I can guarantee you that is my
18 signature.

19 Q. That is your signature. And it also
20 has, it looks like, on the bottom of the first
21 page on to the second page, signatures of the
22 other members of council?

23 A. Yeah. It appears to be that way,
24 yes.

25 Q. And it looks like seven total

1 signatures. That's the number of --

2 A. Yes.

3 Q. Seven signatures?

4 A. Seven signatures.

5 Q. And those seven members of council?

6 A. Those were seven members of council
7 at the time.

8 Q. Very good.

9 When did you first see this
10 proclamation in printed form?

11 A. I don't recall.

12 Q. Did you see it before the meeting of
13 April 23rd, 2018, or did you first see it at
14 the meeting of April 23rd, 2018?

15 A. I -- I -- I can't speculate because
16 I think I saw it at that meeting.

17 Q. You did see it at the meeting?

18 A. I can't -- I can't remember.

19 No. I didn't. I don't -- I don't
20 recall. Sorry.

21 Q. You don't recall when you first saw
22 this proclamation?

23 A. I don't.

24 Q. When did you first become aware of
25 the potential of filing a vexatious lawsuit --

1 litigator lawsuit against Mr. Oppenheimer?

2 A. I don't have a date for you. I
3 can't --

4 Q. Did it first come up at the meeting
5 or were you aware of it prior to the meeting of
6 April 23, 2018?

7 A. I don't -- I don't recall. I really
8 don't remember if it came first or what came
9 first.

10 Q. When you went into the executive
11 session on April 23, 2018, did you know it was
12 to talk about filing a vexatious litigation
13 lawsuit against Mr. Oppenheimer?

14 A. Are these the minutes?

15 Q. You're looking at Exhibit 2. Yes,
16 those are the minutes. If you look, I think,
17 at the bottom of page 5 --

18 A. It will tell you exactly why we went
19 into executive session on here because we
20 announce why we go.

21 Q. If you look at the bottom of page 5
22 of 6 of Exhibit 2, that being the minutes from
23 April 23, 2018, it says Proclamation 18-01.
24 Mr. Fox said the Proclamation is related to
25 pending or imminent litigation and advised

1 Council to adjourn into Executive --
2 correction -- advise Council adjourn into
3 Executive Session to discuss.

4 Then it says a Motion to adjourn
5 into Executive Session for the purpose of
6 discussing pending litigation and to discuss
7 the sale or purchase of property for public
8 purposes.

9 A. Well, it's right there. We
10 discussed pending litigation, purchase or sale
11 of property, and public purposes.

12 Q. What pending -- what litigation was
13 pending at the time?

14 A. We had a lot.

15 Q. What did they --

16 A. So I don't --

17 Q. Okay. You said you had a lot. Do
18 you know?

19 THE WITNESS: Isn't that protected?

20 BY MR. HARTMAN:

21 Q. You had a lot of pending litigation
22 you just testified to.

23 What litigation was pending at the
24 time?

25 MR. ROBERTS: Pending litigation is

1 a public record.

2 A. I'm not sure what was pending in
3 2018.

4 BY MR. HARTMAN:

5 Q. Well, you just testified under oath
6 that you had a lot of pending litigation.

7 Can you tell me any of the pending
8 litigation --

9 A. No, I can't.

10 Q. -- at the time?

11 A. I don't know. So there is always
12 litigation that is out there. So 2018,
13 April 2018, I can't -- I can't speculate
14 without having records in front of me. I'm
15 sorry. But if he said pending litigation, it
16 was something that was open at that time.

17 (Defendant's Exhibit 4 was marked for
18 identification.)

19 BY MR. HARTMAN:

20 Q. I'm going to hand you what's been
21 marked as Exhibit 4.

22 This is a filing from the Hamilton
23 County Common Pleas courts. And those are the
24 administrative appeal. It indicates that a
25 C. Scott Gehring is suing Madeira Planning

1 Commission and the City of Madeira. It was
2 Filed on January 18, 2017.

3 Are you familiar with this lawsuit?

4 A. Yes, I am.

5 Q. Was that pending on April 23, 2018?

6 A. It could have been. I don't know
7 when it was dropped.

8 THE WITNESS: Is there something in
9 here that says when it was --

10 MR. ROBERTS: Don't worry about it.
11 Just answer his question.

12 THE WITNESS: Okay.

13 A. I don't know.

14 BY MR. HARTMAN:

15 Q. Who is Scott Gehring?

16 A. He's a council member.

17 Q. Do you know how this lawsuit or this
18 administrative appeal got resolved?

19 A. I'm pretty sure that Scott re --
20 took it out, but I'm not sure exactly. You
21 know, I think he withdrew it.

22 Q. Okay. So back to the meeting of
23 April 23, 2018; you cannot tell me any of the
24 pending litigation, though you've identified
25 there was a lot of pending litigation at the

1 time?

2 A. Well, I will say that I'm not sure
3 if there was a lot of pending litigation.
4 There always seems to be something that we
5 discuss under pending litigation.

6 Q. It talks about to discuss the
7 purchase or sale of property for public
8 purposes that was discussed in this meeting.

9 A. Okay.

10 Q. Was it for the purchase or the sale
11 of property?

12 A. I don't know. I don't know what we
13 were talking about at that point. This is over
14 a year ago.

15 Q. When you went into the executive
16 session, what was the -- you would -- strike
17 that.

18 You would agree with me, according
19 to the official minutes, that the motion to
20 adjourn into executive session only identified
21 the discussion of pending litigation and did
22 not include imminent litigation, correct?

23 A. I assume so.

24 Q. And during this executive session,
25 the general topic included the filing of a

1 vexatious litigation lawsuit against
2 Mr. Oppenheimer, correct?

3 A. I'm not -- I'm not sure if that -- I
4 know we were on the floor.

5 Q. Excuse me. You were on the floor?

6 A. We were on the floor when we
7 accepted the proclamation. We weren't in
8 executive session.

9 Q. Well, you came out and adopted it
10 after the executive session. If you go on to
11 page 6, you return from executive session, then
12 there's a motion to accept Proclamation 18-01.

13 Do you see that on page 6?

14 A. Yes, I do. I see that, yes.

15 Q. So Mr. Fox comes in that evening,
16 says I want to add a Proclamation 18-01 --

17 A. Okay.

18 Q. -- to the agenda. Then announces
19 the proclamation is related to pending or
20 imminent litigation and advise counsel to
21 adjourn into the executive session.

22 A. Okay.

23 Q. And then you come out of executive
24 session and the council adopts Proclamation
25 18-01.

1 Do you see that?

2 A. I do. So I assume we discussed it,
3 yes.

4 Q. Was Proclamation 18-01 that is
5 Exhibit 3 presented to you in the executive
6 session?

7 MR. ROBERTS: Objection. Asked and
8 answered.

9 Go ahead, Traci.

10 BY MR. HARTMAN:

11 Q. You can answer.

12 MR. ROBERTS: You can go ahead.

13 A. I don't know. I don't know if it
14 was typed up after or before.

15 Obviously, Scott Gehring signed it,
16 so -- he wasn't there, so some people signed it
17 after.

18 BY MR. HARTMAN:

19 Q. Well, you said -- you signed it, it
20 says, in witness whereof -- I'm looking at
21 Exhibit 3. In witness whereof, I have hereunto
22 issued this Proclamation this 23rd day of
23 April 2018.

24 Do you see that?

25 A. I do see that.

1 Q. Did you sign it on the 23rd day of
2 April 2018?

3 A. I can't say that I did. I don't
4 know.

5 Q. So you may have backdated it
6 after -- when you signed it?

7 MR. ROBERTS: Objection.

8 Go ahead. You can answer.

9 A. I don't know. I assume it was in
10 typed form after and we signed it. I probably
11 delivered it on the 23rd.

12 BY MR. HARTMAN:

13 Q. Well, when you came out of executive
14 session and you voted -- strike that.

15 If you look at page 6 of the minutes
16 that is Exhibit 2, it indicates that you voted
17 yes to accept Proclamation 18-01, correct?

18 A. Correct, on August 23rd.

19 Q. Correct. If the document that is
20 Exhibit 3 was not typed up and presented to
21 you, what were you voting on then?

22 A. This proclamation.

23 Q. So it was typed up when you voted on
24 it?

25 A. It wasn't probably in this form.

1 Q. What form would it have been in?

2 A. Well, either -- I mean, there wasn't
3 like a signature page or anything like that.
4 There was probably the wording of it.

5 MR. ROBERTS: Traci, don't guess.
6 Just tell him what you remember.

7 A. Okay. I don't remember.

8 MR. ROBERTS: If you remember,
9 great. If you don't, that's --

10 BY MR. HARTMAN:

11 Q. Do you recall coming out of the
12 executive session and Mr. Fox reading
13 Proclamation 18-01 in its entirety?

14 A. I do not remember August -- April --

15 MR. OPPENHEIMER: Do you want to
16 play the recording?

17 MR. HARTMAN: Hang on.

18 BY MR. HARTMAN:

19 Q. Go ahead.

20 A. I don't remember. I don't remember
21 who read it; if it was me, if it was Fox.

22 Q. But it was read publicly?

23 A. Yes, it was.

24 Q. What were they reading from?

25 A. I don't know. I don't know.

1 MR. ROBERTS: That's --

2 Q. Were they reading --

3 MR. ROBERTS: Hold on. Hold on.

4 Just because he asks you a
5 question -- you tell him what you recall
6 factually. If you can't recall, you
7 can't recall. That's it.

8 A. I don't know.

9 BY MR. HARTMAN:

10 Q. Somebody was reading, though, from a
11 sheet of paper?

12 A. I don't know. I assume.

13 Q. If you will, go to Exhibit 3.

14 So by voting for Proclamation 18
15 (sic) that is Exhibit 3, you agree with the
16 propositions that are in there, the whereas
17 clauses?

18 A. Yes.

19 Q. If you can look at the second
20 whereas clause, can you read that out loud for
21 me?

22 A. Whereas, Mr. Oppenheimer continues
23 to make accusations of fraud, corruption, and
24 collusion against the City of Madeira's public
25 servants including the City Manager, Tax

1 Commissioner, Clerk of Council, Council
2 Members, and Law Director. This continues to
3 take place despite clear and unequivocal
4 judicial declarations and findings that his
5 accusations are false and without merit.

6 MR. ROBERTS: She's trying to take
7 down what you say, so when you read
8 really fast, it's kind of difficult.

9 She's pretty good, though. I think
10 she picked that all up.

11 THE WITNESS: Okay.

12 MR. ROBERTS: Just be mindful when
13 you're doing that.

14 THE WITNESS: All right.

15 MR. ROBERTS: Okay.

16 BY MR. HARTMAN:

17 Q. What does that have to do with
18 whether or not Mr. Oppenheimer is a vexatious
19 litigator?

20 MR. ROBERTS: Objection. Legal
21 conclusion.

22 You can go ahead and answer, Traci.

23 A. What do you mean?

24 He does -- he makes false statements
25 without merit about all of us.

1 BY MR. HARTMAN:

2 Q. Okay. So you don't like what he
3 says?

4 MR. ROBERTS: Objection.

5 Go ahead.

6 A. I think he lies about us and says
7 that we're liars.

8 BY MR. HARTMAN:

9 Q. Okay.

10 A. He attacks our integrity.

11 Q. And you don't like that?

12 A. Absolutely not. Nobody likes that.

13 Q. And that's kind of the gist as to
14 that second whereas clause that you just read?

15 MR. ROBERTS: Objection. Misstates
16 the record.

17 Go ahead.

18 Same objection about legal
19 conclusion.

20 Go ahead.

21 A. What was your question?

22 BY MR. HARTMAN:

23 Q. You don't like him making all these
24 what you characterize as false lies about you,
25 et cetera, and other members of the city

1 government?

2 A. Well, me personally, I don't like
3 him attacking my integrity.

4 Q. Okay. How has he attacked your
5 integrity, you personally?

6 A. Me personally. He has made false
7 statements about me, my family. He questions
8 my actions every time we would have some kind
9 of ruling.

10 He kind of leaves me alone now that
11 I'm not the mayor, but he constantly would, you
12 know, look for something that we were doing
13 wrong.

14 Q. And you did not like that?

15 A. You know, Mr. Hartman, I respect
16 Mr. Oppenheimer. I've known him since I was a
17 little girl.

18 So I don't like what he does to the
19 city and I don't like what he does to our staff
20 and I don't like what he does to the council
21 members.

22 Q. Are there any other aspects of what
23 he does that's set forth in that second whereas
24 clause besides --

25 A. If you're trying to --

1 Q. -- besides what you just gave me?

2 A. No.

3 Q. I want to get down to the bottom of
4 the Proclamation 18-01 that you voted for, that
5 you signed the proclamation as mayor.

6 You indicate that the undersigned --
7 it indicates, the undersigned members of
8 Council do hereby proclaim our intention to
9 direct Law Director Brian W. Fox to explore the
10 filing of a civil action, pursuant to Ohio
11 Revised Code 2323.52, to have Mr. Philip
12 Douglas Oppenheimer declared a vexatious
13 litigator.

14 A. Correct.

15 Q. Do you see that?

16 A. Uh-huh.

17 Q. So at this stage, that is on
18 April 23rd, 2018, council was simply having
19 Mr. Fox explore the potential of a vexatious
20 litigation lawsuit?

21 A. My understanding is that Mr. Fox was
22 to explore it and then file it if -- but based
23 on legal advice, you know, like -- I'm not --
24 I'm --

25 Q. His legal analysis?

1 A. His legal analysis. That was my
2 understanding.

3 Q. So not only was Mr. Fox supposed to
4 explore it, but if he felt there was legal
5 merit to it, Mr. Fox had the authority from
6 city council to file the lawsuit?

7 A. That was my understanding.

8 Q. What was the basis of that
9 understanding?

10 A. My lack of knowing anything else. I
11 don't -- I'm not a lawyer by trade. I don't
12 know, but that was my understanding. My
13 personal understanding.

14 Q. Right. But I'm trying to use the
15 language, looking at the language that --

16 A. And I'm telling you what I interpret
17 that to mean to me.

18 Q. Okay. Where do you get -- what
19 language indicates that he has the authority
20 then to proceed to file the lawsuit when it
21 says simply --

22 A. So Brian Fox --

23 Q. Hang on.

24 A. Okay.

25 Q. You simply indicate it's the -- or

1 the council, and yet you voted for it -- this
2 proclamation says it's an intention to direct
3 him to explore the filing.

4 Where do we get from exploring the
5 filing of a lawsuit to actually the authority
6 to file that lawsuit?

7 A. You know, I'm just a mom. And I'm a
8 volunteer, basically, for the community. So I
9 rely on the law director for my legal advice
10 and legal counsel.

11 My personal interpretation was that
12 he was going to explore it. And if the legal
13 analysis said it was okay, he would file it.

14 That is my interpretation of what
15 this was about. That clause. I don't have any
16 legal training, therefore, I rely on the
17 experts.

18 Q. But I'm trying to figure out when
19 this really comes up for you to assess because
20 you say -- if you remember, Mr. Fox at the
21 beginning of the meeting wants to add the
22 proclamation to the agenda.

23 A. Correct.

24 Q. You go into an executive session.

25 A. Correct.

1 Q. You tell me you don't even recall if
2 you even discussed the proclamation in
3 executive session --

4 A. It's a year ago.

5 Q. -- and then you come out -- and then
6 you come out and immediately adopt the
7 proclamation.

8 A. I don't know exactly what we
9 discussed.

10 Q. Okay. Would it be safe to say that
11 from your discussions -- and I don't want to
12 get into particulars, but generally speaking
13 from your discussions in the executive session
14 relative to Proclamation 18-01 and whether or
15 not Mr. Oppenheimer was or was not a vexatious
16 litigator, that your understanding was that we
17 were -- council was going to authorize the
18 proclamation and if Mr. Fox thought that there
19 was merit to it, he had the authority to file
20 the lawsuit?

21 MR. ROBERTS: Objection. Asked and
22 answered.

23 Go ahead.

24 A. Whenever we take something on the
25 floor and we vote on it, you don't know how

1 people are going to vote. So you don't know if
2 it was going to be adopted at that point, so --
3 BY MR. HARTMAN:

4 Q. No. I understand you're not going
5 to not adopt it, but that's not really my
6 question.

7 A. Okay.

8 Q. I'm just trying to figure out -- you
9 said your understanding was -- and I think --

10 A. I don't know --

11 Q. I think I understand what you're
12 getting at. I just, you know, just not --
13 maybe I'm not asking it the right way.

14 I just look at the facts here in
15 this meeting from April 23, 2018. Mr. Fox
16 comes in, says I want to add Proclamation 18-01
17 to the agenda.

18 A. That's what the minutes say.

19 Q. Right. Nowhere in the minutes --
20 and if you want to take time to look through
21 the minutes, that is Exhibit 2, nowhere else in
22 the minutes does Proclamation 18-01 come up
23 until you get to the bottom of page 5 right
24 before the executive session where Mr. Fox says
25 the proclamation is relating to pending or

1 imminent litigation and advise council adjourn
2 into executive session to discuss.

3 A. Okay.

4 Q. Okay. That's the only place I see
5 in the minutes when it first comes up.

6 And you go into the executive
7 session and come out and adopt Proclamation
8 18-01. And I'm just trying to understand your
9 understanding of 18-01, which was not only to
10 have him explore -- that is Mr. Fox explore --

11 A. I told you my understanding.

12 Q. But was it from your discussions in
13 the executive session, or when else would you
14 have discussed it and arrived at that
15 understanding?

16 A. My understanding -- yeah. I mean,
17 obviously we went into executive session and we
18 talked about this and we came out and adopted
19 it.

20 Q. All right. And based upon that,
21 your understanding not only was he going to
22 explore it, but if he --

23 A. That is my personal understanding of
24 what that meant.

25 Q. That based upon that, you come out,

1 you adopt, that your understanding was not only
2 was he going to explore it, but if he felt
3 there was merit to it, he could go ahead and
4 file the lawsuit?

5 A. Correct.

6 Q. I would just note, I think the next
7 council meeting -- by the time the next council
8 meeting happens, the lawsuit had already been
9 filed. So I just want to make sure what
10 triggered -- it was May 14th is when I believe
11 the next council meeting would be.

12 A. Okay.

13 Q. I'm just trying to figure out what
14 triggered the filing of the lawsuit. I
15 understand exploring it.

16 And so because the issue again,
17 though, came up recently, did it not, at
18 council about the authorization of the lawsuit?
19 Is that -- in August of this past year?

20 A. You're going to have to give me
21 something else.

22 Q. Okay. Let me give you a document.
23 See if this helps refresh your recollection.

24 A. I was over two years of meetings.
25 You got to --

1 (Defendant's Exhibit 5 was marked for
2 identification.)

3 BY MR. HARTMAN:

4 Q. I'm handing you what's been marked
5 as Exhibit 5. And it indicates it's at the
6 Regular Meeting of Madeira City Council,
7 August 12th, 2019. That it indicates a Motion
8 Clarifying City Council's Authorization --

9 MR. ROBERTS: Which bullet point are
10 you reading from, Counsel?

11 MR. HARTMAN: Please?

12 MR. ROBERTS: Which of these bullet
13 points are you reading from?

14 MR. HARTMAN: No. I'm reading from
15 the title.

16 MR. ROBERTS: Okay.

17 BY MR. HARTMAN:

18 Q. Motion Clarifying City Council's
19 Authorization Regarding the Vexatious Litigator
20 Filing, and Advising of Council's Intentions
21 Should That Action Require an Appeal or
22 Refiling.

23 A. Okay.

24 Q. Does that refresh your recollection
25 from what happened four months ago or so, five

1 months ago?

2 A. Okay.

3 Q. Does that refresh your recollection
4 as to what happened four or five months ago on
5 this matter?

6 A. I don't know what I had for
7 breakfast yesterday, so -- sure. A little bit.
8 If it's got my signature on it.

9 Q. When you're saying you have
10 absolutely no recollection about anything that
11 happens at past council meetings, are you a
12 council member that just flushes everything out
13 of your memory at the end of a council meeting?

14 MR. ROBERTS: Objection.

15 You don't need to answer that.

16 That's a ridiculous question.

17 BY MR. HARTMAN:

18 Q. Do you flush everything out of your
19 mind at the end of council meetings?

20 MR. ROBERTS: Go ahead and answer
21 that.

22 A. Sure.

23 BY MR. HARTMAN:

24 Q. Okay.

25 A. Not everything, but -- I mean,

1 there's so much time that passes between each
2 council meeting that you can't remember every
3 detail.

4 So you're telling me that we did
5 this, I recall this.

6 Q. You recall it. That's all. I'm not
7 asking for details right now. I'm just
8 asking -- you recall this fact, right?
9 Correct?

10 A. Yes. It's familiar.
11 (Defendant's Exhibit 6 was marked for
12 identification.)

13 BY MR. HARTMAN:

14 Q. Hand you what's been marked as
15 Exhibit 6. Maybe this will help you remember
16 what happened at a council meeting four to five
17 months ago.

18 A. That's why we have minutes.

19 Q. So I've handed you what's been
20 marked as Exhibit 6. And I would indicate were
21 the minutes taken from the website for
22 August 12th, 2019.

23 You were at this meeting?

24 A. I was present.

25 Q. And this motion comes up, I think,

1 on page 5 of 7.

2 Middle of the page there's a motion
3 to go into executive session for the purpose of
4 discussing pending litigation.

5 Do you see that?

6 A. I do see that.

7 Q. What pending litigation was going to
8 be discussed in the executive session?

9 A. I don't know. Whatever was pending
10 at that point.

11 Q. Was this lawsuit -- vexatious
12 litigator lawsuit -- read the minutes if you
13 have to to help refresh your recollection.

14 A. The date is right here on the
15 lawsuit, so yes, this one was pending, right?

16 Q. The question is, was that -- was
17 this lawsuit the subject of discussion --

18 A. I don't know what pending litigation
19 we discussed.

20 Q. You have no recollection of that
21 executive session?

22 A. We discuss a lot of things in
23 executive session. So for you to ask me what
24 specific thing we did at that moment, I have no
25 idea.

1 Q. So reviewing the minutes you cannot
2 tell me what pending litigation was discussed
3 in the executive session?

4 MR. ROBERTS: Objection. Asked and
5 answered a couple times.

6 Go ahead.

7 BY MR. HARTMAN:

8 Q. If you can, take a minute to review
9 following Section XIV, Litigation Clarification
10 on page 5.

11 Do you see that on page 5?

12 A. Right here, yeah.

13 Q. It indicates first that you come out
14 with a motion to come out of executive session?

15 A. Uh-huh.

16 Q. Do you know how you voted on that
17 motion to come out of executive session?

18 MR. ROBERTS: How Traci voted?

19 A. How I voted?

20 BY MR. HARTMAN:

21 Q. Yes.

22 A. I voted yes to come out of executive
23 session.

24 Q. How do you know that if it's not in
25 the minutes?

1 A. Because I'm not in executive session
2 anymore.

3 Q. But you know you voted yes on that
4 motion?

5 A. Otherwise, I'd still be in executive
6 session.

7 Q. How can the public determine who
8 voted on that motion to come out of executive
9 session?

10 A. I don't know.

11 Q. Do you see a roll call vote or any
12 vote indicated on that motion in these minutes?

13 A. Obviously, if they voted no to come
14 out of executive session, they'd still be in
15 executive session.

16 Q. That's not the question.
17 Do you see any vote indicated on
18 that motion to come out of executive session?

19 A. No, I do not.

20 Q. Then under item 1 it indicates
21 Motion Clarifying City Council's Authorization
22 Regarding the Vexatious Litigator Filing, and
23 Advising of Council's Intentions should the
24 Action Require an Appeal or Refiling.

25 Do you see that heading?

1 A. I do.

2 Q. Then there's a long paragraph. Take
3 your time to read the entire paragraph
4 indicating what Mr. Fox explained.

5 Let me know when you're done
6 reading, please.

7 A. Okay.

8 Q. Did that help refresh your
9 recollection as to what was discussed during
10 the executive session?

11 A. I'll tell you what it reflects is I
12 remember being in the courtroom and -- yes.
13 And then -- because you were there.

14 Q. You're talking in the courtroom, not
15 in the executive session?

16 A. Yeah. So this rings a bell, yes.

17 Q. And it helps refresh your
18 recollection as to what was discussed,
19 generally speaking, in the executive session
20 that night?

21 A. Not all of it, but some of it, yeah.

22 Q. And part of the conversation
23 concerned this pending lawsuit against
24 Mr. Oppenheimer?

25 A. Yeah. I'm pretty sure the election

1 one was still hanging out there, too, but I
2 don't know the dates.

3 Q. When you say the election one --

4 A. The lawsuit that Mr. Oppenheimer
5 filed about the election.

6 Q. The one challenging --

7 A. Special --

8 Q. -- challenging the certification to
9 the board of elections --

10 A. Special elections, yeah.

11 I don't know if it was still out
12 there then or not, but --

13 Q. Now, if you look at Mr. Fox's
14 statement, in the second sentence it says --
15 partway through the sentence, it says, Council
16 is undertaking this motion to make plain for
17 the Court that the past authorization, prior to
18 the commencement of the suit, was in place, and
19 that going forward Council's also authorizing
20 actions to be taken relative to that case.

21 Do you see that?

22 A. I do.

23 Q. Do you agree with the proposition in
24 that statement that the past authorization
25 prior to the commencement of the suit was in

1 place?

2 A. I do.

3 Q. Okay. When did council give that
4 authorization?

5 A. I told you. My feeling is that we
6 gave it to him in that proclamation. That is
7 my personal feeling.

8 Q. Okay. That's your feeling, but can
9 you can point to anything where council as a
10 whole authorized it, other than that
11 Proclamation 18-01?

12 MR. ROBERTS: Objection. Asked and
13 answered.

14 Go ahead.

15 A. I told you, that's my understanding
16 of what we were doing.

17 BY MR. HARTMAN:

18 Q. Okay. Now, it indicates that you
19 read the following motion later on here.

20 Do you see that?

21 A. Yes.

22 Q. Do you recall reading that motion?

23 A. It says that I read it, so I
24 probably read it.

25 Q. I didn't ask you what it says. I

1 said, do you recall reading the motion?

2 A. No, I do not. Not specifically.

3 Q. Go over to page 6. Third bullet
4 down. And it says, Council moves to clarify
5 that this Motion was made in response to a
6 specific decision issued by the Court in Case
7 No. A1802415 (a decision which considers
8 neither the authorization provided by City
9 Council in 2018 nor the City Manager's
10 authorization in connection therewith).

11 Do you see that portion --

12 A. I do see that.

13 Q. -- portion of the bullet point I
14 read?

15 It references the authorization
16 provided by city council in 2018.

17 When did the city council authorize
18 the lawsuit in 2018 as indicated there?

19 A. I told you. In the proclamation
20 that was my feeling that we had authorized it.

21 Q. Do you recall in this executive
22 session, that is August 12th, 2019, who else
23 was in the executive session?

24 A. On August 12th?

25 Q. Yes.

1 A. Whoever was present at -- so --

2 Q. So --

3 A. One, two, three, four, five, six,

4 seven.

5 Q. The seven council members?

6 A. Plus Brian Fox, plus Tom Moeller,

7 plus Lori.

8 Q. Lori Thompson, the assistant city

9 manager?

10 A. Uh-huh.

11 Q. Mr. Schaefer, the police chief?

12 A. No.

13 Q. The clerk of council --

14 A. No.

15 Q. -- Ms. Doyle?

16 A. No.

17 Q. Okay. Is that generally who was

18 always in executive sessions?

19 A. Yeah.

20 Q. I didn't hear you.

21 A. Yes.

22 Q. Okay. Who invited or authorized

23 Mr. Moeller to come into the executive session?

24 A. We always -- we can invite whoever

25 we want and we always invite Mr. Moeller.

1 Q. Who invited Ms. Thompson into the
2 executive session?

3 A. We always invite Ms. Thompson.

4 Q. So council makes the decision to
5 invite them into?

6 A. Uh-huh. Council can invite whoever
7 they want into executive session.

8 Q. Can you show me where in the minutes
9 here that council authorized and made the
10 decision to invite Mr. Moeller and Ms. Thompson
11 into the executive session?

12 A. It's not the minutes. It's just a
13 standing invitation.

14 (Defendant's Exhibit 7 was marked for
15 identification.)

16 BY MR. HARTMAN:

17 Q. Hand you what's been marked as
18 Exhibit 7. I will represent to you these are
19 the codified ordinances of the City of Madeira,
20 Chapter 30, as taken from the Madeira
21 government web page.

22 Again, turn to page 5. Top right
23 corner is the number. And I'm looking third
24 paragraph down. It starts with a number 2 in
25 parens.

1 It states, Executive sessions shall
2 be limited to Council members, except that
3 those public officials or other persons who are
4 necessary or helpful for the discussion of the
5 subject matter of the executive session may be
6 included upon invitation of the Council members
7 requesting the executive session with the
8 consent of a majority of Council.

9 Do you see that?

10 A. I do see that.

11 Q. So I was asking you with respect to
12 the executive session held on August 12th,
13 2019, where is the indication of a consent of a
14 majority of council that Mr. Fox, Mr. Moeller,
15 or Ms. Thompson joined the council members in
16 the executive session?

17 A. We had --

18 MR. ROBERTS: Objection. Asked and
19 answered.

20 Go ahead.

21 A. We have a standing invitation for
22 them.

23 BY MR. HARTMAN:

24 Q. Where is that documented, that
25 standing invitation?

1 A. I'm not sure.

2 Q. Has it ever been documented, to your
3 knowledge?

4 A. To my knowledge, I don't know.

5 Q. Are you aware during your time on
6 counsel from December 2013 to the present, have
7 you ever been made -- or voted on a motion to
8 invite people into executive sessions?

9 A. We have asked people to come to
10 executive session beyond those people that are
11 there, yes.

12 Q. Okay. Such as?

13 A. Christine Parker has been in to
14 discuss her lease. We've had -- I can't think
15 of anybody else. That's the most recent.

16 Q. Christine Parker to discuss her
17 lease?

18 A. She rents one of our city-owned
19 buildings.

20 Q. When did that take place?

21 A. This was just recently. Like just a
22 couple weeks ago.

23 Q. So you went into executive session
24 to discuss a lease of public property?

25 A. Yes. Yes. She already had a lease.

1 She wanted clarification.

2 Q. Do you know what authority or basis
3 went into executive session to discuss that
4 lease?

5 A. Yes.

6 MR. ROBERTS: Objection. It's
7 totally irrelevant to the purpose of this
8 deposition.

9 I instruct you not to answer.

10 BY MR. HARTMAN:

11 Q. Are you refusing to answer?

12 MR. ROBERTS: I think she did
13 answer, but to the extent you ask another
14 question about it.

15 BY MR. HARTMAN:

16 Q. So when Ms. Parker went into the
17 executive session, was there a motion or a vote
18 to indicate that she was invited into the
19 executive session?

20 MR. ROBERTS: Objection. Instruct
21 you not to answer.

22 Go ahead.

23 You don't take my instruction?

24 THE WITNESS: Oh, did you say not
25 answer?

1 MR. ROBERTS: I did.

2 THE WITNESS: Okay. Sorry.

3 BY MR. HARTMAN:

4 Q. During your time on council since
5 December 2013 to the present, have you ever
6 been involved or had a motion or a vote to
7 expressly invite and authorize a person other
8 than council members to come into an executive
9 session?

10 MR. ROBERTS: Objection. Asked and
11 answered.

12 Go ahead.

13 THE WITNESS: You want me to answer
14 now?

15 MR. ROBERTS: Yeah.

16 A. Okay. I don't know if we've had
17 like a -- a vote on that, but we have, in the
18 past, either the mayor or someone said can we
19 invite so-and-so into executive session.

20 And it has always been the
21 understanding that we can invite whoever we
22 want into executive session.

23 BY MR. HARTMAN:

24 Q. Subject to the consent of the
25 majority of council.

1 Do you see that in your ordinance?

2 A. Yeah. So if somebody would object
3 to it, then we would have heard. It doesn't
4 say it has to be voted on.

5 MR. ROBERTS: Just answer the
6 question.

7 BY MR. HARTMAN:

8 Q. But you would agree it's taking
9 official action to invite somebody into an
10 executive session, right?

11 MR. ROBERTS: Objection. Misstates
12 facts.

13 Go ahead.

14 A. What did you want me to --

15 BY MR. HARTMAN:

16 Q. That is an official action on behalf
17 of council to invite somebody into an executive
18 session.

19 MR. ROBERTS: Objection.

20 Go ahead.

21 A. We can invite whoever we want to
22 discuss something if we need more information.

23 BY MR. HARTMAN:

24 Q. That wasn't my question.

25 The question is you would agree it's

1 official action by council to invite somebody
2 into executive session?

3 MR. ROBERTS: Objection. Calls for
4 legal conclusion.

5 Go ahead.

6 A. I don't know what you mean by
7 official act. I mean, what do you mean by
8 official act?

9 THE WITNESS: Do I have a legal --

10 BY MR. HARTMAN:

11 Q. I'll clarify. You want me to
12 clarify?

13 It's an act of council to invite
14 somebody in. Would you agree with that
15 proposition?

16 MR. ROBERTS: Objection. Calls for
17 a legal conclusion.

18 Go ahead.

19 A. I'm not sure. Any council member
20 can say, can we invite somebody in? So I'm not
21 sure what you mean by official action.

22 BY MR. HARTMAN:

23 Q. Do you recall how you first heard
24 that the lawsuit had actually been filed
25 against Mr. Oppenheimer?

1 A. I do not recall.

2 Q. Do you recall when you received a
3 copy -- have you ever received a copy of the
4 complaint or the amended complaint filed in the
5 action?

6 A. I have a file of the complaint right
7 here. I don't know. I mean, I've seen it but
8 I don't know that I have a copy of it.

9 Q. What do you mean, you've seen it
10 previous?

11 A. I've probably, you know, either been
12 e-mailed it or -- I was the mayor at the time,
13 so I probably got it e-mailed to me.

14 Q. What is your understanding as to
15 what it means for somebody to be a vexatious
16 litigator?

17 MR. ROBERTS: Objection. Legal
18 conclusion.

19 Go ahead.

20 A. That means that Mr. Oppenheimer
21 would have to get authorization from the court
22 to actually file a lawsuit.

23 BY MR. HARTMAN:

24 Q. Okay. That's the result of somebody
25 being declared a vexatious litigator.

1 A. That's what you asked me, isn't it?

2 Q. No. I asked you what it means for
3 somebody to be a vexatious litigator.

4 MR. ROBERTS: Objection.

5 BY MR. HARTMAN:

6 Q. Your layman's understanding.

7 MR. ROBERTS: Objection. Legal
8 conclusion.

9 Go ahead.

10 A. I just told you.

11 You said if he's a vexatious
12 litigator --

13 BY MR. HARTMAN:

14 Q. No, I didn't say if.

15 A. -- what that means.

16 Q. No. What does it mean for somebody
17 to be a vexatious litigator, not what's the
18 ramifications or the consequences?

19 A. Someone that files meritless
20 lawsuits against a party.

21 Q. Okay. And by your voting for and
22 supporting Proclamation 18-01 and the filing of
23 this lawsuit, you believe Mr. Oppenheimer falls
24 within that group?

25 A. Yes, I do.

1 Q. You're aware that one of the cases
2 underlying that claim of him being a vexatious
3 litigator concerned the historic properties,
4 the Muchmore House, I believe, and whether or
5 not the city could sell or dispose of certain
6 property on it.

7 Do you understand that?

8 A. Yeah. Historical asphalt.

9 Q. You were on council at the time,
10 correct?

11 A. I was.

12 Q. You have a general recollection of
13 that lawsuit?

14 A. I do. I do.

15 Q. What was your understanding as to
16 what the issue was in that lawsuit?

17 A. Well, first of all I want to state
18 that I am not a planning commission member. So
19 I don't have all the knowledge of zone.

20 Q. No. I'm just asking your
21 understanding based upon --

22 A. My understanding was that, you know,
23 there was a piece of property that we were
24 going to -- it was the historic -- I call it
25 the historical asphalt. That there was a piece

1 of property that we were going to switch with a
2 developer. And the objection, from my
3 understanding, is that Mr. Oppenheimer was
4 upset saying that that was historical property,
5 the asphalt.

6 Q. And that the charter provision
7 restricted or prohibited that distribution? Do
8 you recall the charter coming into play?

9 A. Yeah. The charter amendment that
10 Mr. Oppenheimer wrote.

11 Q. And that the voters of the City of
12 Madeira passed overwhelmingly, correct?

13 A. Yeah.

14 Q. And so Mr. Oppenheimer, basically,
15 was saying I don't think they can -- the City
16 can dispose of this portion of the property
17 because the charter doesn't allow for it?

18 A. The charter amendment that he wrote,
19 yes.

20 (Defendant's Exhibit 8 was marked for
21 identification.)

22 BY MR. HARTMAN:

23 Q. Handing you what's been marked
24 Exhibit 8. I'll represent to you this is a
25 filing taken from the Hamilton County Common

1 Pleas Court in the lawsuit we were just talking
2 about, the historic asphalt property.

3 This is actually the answer and
4 counterclaim that the City of Madeira and
5 Mr. Moeller filed.

6 If you can go to page 5, I'm looking
7 at paragraph 13 of the counterclaim that was
8 filed by the City of Madeira.

9 A. Wait a minute. I'm not on the --

10 Q. Fifth page back. You're on the
11 exhibits. You're going too far.

12 A. My point is, I just looked at this.
13 I'm not even on council.

14 Q. You were not on council then?

15 A. Wait a minute. On this one. On
16 Exhibit 1, I'm not on council.

17 Q. Exhibit 1 indicates it was passed on
18 October 22, 2012, which would be compatible
19 with when you --

20 A. When I'm not on council.

21 Q. -- were not on council.

22 I'm looking at the counterclaim.

23 A. Oh, okay. Sorry. What page?

24 Q. Five.

25 A. Okay. Five.

1 Q. I'm looking at paragraph 13 of the
2 counterclaim that was filed by the City of
3 Madeira in this lawsuit over the authority of
4 the City of Madeira to take care of the
5 historic asphalt properties that you indicated.

6 A. Yeah.

7 Q. And paragraph 13 is, by the City of
8 Madeira says, A real and justiciable dispute
9 exists between the parties regarding the
10 rights, status, and other legal relations
11 arising from the foregoing facts. And that the
12 respondents -- that being the City of
13 Madeira and Mr. Moeller -- seek a declaratory
14 judgment regarding said rights.

15 Do you see that in paragraph 13?

16 A. I do, yeah.

17 Q. So I'm lost from your understanding
18 as to why if the City of Madeira says a real
19 controversy or dispute exists regarding the
20 rights over these properties and that the City
21 of Madeira's saying we want to get a
22 declaration as to what these rights are, why is
23 it -- why would it be vexatious for Mr.
24 Oppenheimer to seek a similar right?

25 MR. ROBERTS: Objection. Objection.

1 As counsel knows, it's formulated legal
2 words. Calls for a legal conclusion.

3 Answer if you can. Go ahead.

4 THE WITNESS: I'm not really
5 understanding what he's asking anyway,
6 so --

7 BY MR. HARTMAN:

8 Q. Were you aware that the City of
9 Madeira filed a counterclaim saying, Court, we
10 want you to tell us what these rights are over
11 these properties?

12 A. Maybe -- I don't know. I don't
13 know. It's very confusing to me what all that
14 means.

15 Q. Have you been involved in litigation
16 before, personally or business-wise?

17 A. I am a CASA.

18 Q. Say again.

19 A. I'm a CASA.

20 Q. Okay.

21 A. So in dependency court is really the
22 extent.

23 Q. But in a personal capacity or as a
24 business owner you've not been involved in
25 litigation?

1 A. No. I was a teacher.

2 Q. Congratulations to you on that.

3 MR. HARTMAN: I'm going to take a
4 brief break here.

5 (A recess was taken from 2:56 to 3:01.)

6 MR. HARTMAN: We have no further
7 questions. We will order a transcript.

8 You do have the right to review this
9 transcript for signature and to make any
10 clerical or typographical errors that the
11 court reporter may have made.

12 Do you wish to review the
13 transcript?

14 THE WITNESS: Okay.

15 MR. ROBERTS: We're going to take
16 signature, yeah.

17 MR. HARTMAN: Okay.

18

19

20

TRACI THEIS

21

22 - - -

23 DEPOSITION ADJOURNED AT 3:02 P.M.

24 - - -

25

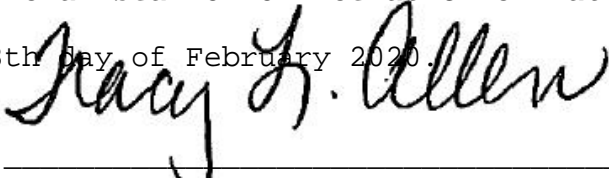
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C E R T I F I C A T E

STATE OF OHIO :
 : SS
COUNTY OF HAMILTON :

I, Tracy L. Allen, RPR, RMR, the undersigned, a duly qualified and commissioned notary public within and for the State of Ohio, do certify that before the giving of her deposition, TRACI THEIS was by me first duly sworn to depose the truth, the whole truth and nothing but the truth; that the foregoing is the deposition given at said time and place by TRACI THEIS; that I am neither a relative of nor employee of any of the parties or their counsel, and have no interest whatever in the result of the action; and that I am not, nor is the court reporting firm with which I am affiliated, under a contract as defined in Ohio Civil Rule 28(D).

IN WITNESS WHEREOF, I hereunto set my hand and official seal of office at Cincinnati, Ohio, this 28th day of February 2020.



Tracy L. Allen, RPR, RMR
Notary Public - State of Ohio
My commission expires July 29, 2023.

1
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