

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA

* * * * *

TANYA CARPENTER AND HIGH
ROAD PRODUCTIONS, LLC

* CASE NO.
* 2:25-CV-00788-CJB-
* KWR

VERSUS

TANGIPAHOA PARISH, ROBBY
MILLER, INDIVIDUALLY AND
IN HIS CAPACITY AS PARISH
PRESIDENT, KELLY WELLS,
INDIVIDUALLY AND IN HIS
CAPACITY AS FLORIDA
PARISHES ARENA DIRECTOR,
TONI JEAN CATALANO,
INDIVIDUALLY AND IN HER
CAPACITY AS OFFICE MANAGER
OF FLORIDA PARISHES ARENA,
AND LISA M. COOLEY

* JUDGE CARL J.
* BARBIER
*
* MAGISTRATE JUDGE
* KAREN WELLS ROBY

* * * * *



Deposition of CHARLES ROBERT "ROBBY"
MILLER, JR., taken on Tuesday, March 24, 2026,
commencing at 9:59 a.m., in the offices of
MOODY LAW FIRM, Attorneys at Law, 1250 S.W.
Railroad Avenue, Suite 170, Hammond, Louisiana
70403.

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1 EXHIBITS:

2 Miller No. 1 59
3 E-Mail String starting with
4 E-Mail from Ronda Durbin to
5 Robby Miller and Joe Thomas
6 Date: 10/11/2023
7 Bates No. TPG-0003537 to -3528

8 Miller No. 2 75
9 E-mail from Lane Taillon
10 To: Ronda Durbin
11 Date: 6/26/2025
12 Subject: Fwd: Arena Letter, Whitney
13 Granger

14 Miller No. 3 79
15 Certified Mail Envelope
16 Letter from Brad Cascio to Tanya Carpenter
17 Dated October 23, 2024

18 Miller No. 4 90
19 Letter from Robby Miller, President
20 Tangipahoa Parish Government
21 To Bailey Nahrgang
22 National Barrel Horse Association
23 Date: November 19, 2024
24
25

1 APPEARANCES:

2 Representing Tanya Carpenter and High Roads
3 Productions, LLC:

4 BLUE WILLIAMS, LLC
5 Attorneys at Law
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8 Metairie, Louisiana 70002

9 BY: STEVEN M. MAUTERER
10 (smauterer@bluewilliams.com)

11 Representing Tangipahoa Parish; Robby Miller,
12 Individually and in His Capacity as Parish
13 President; Kelly Wells, Individually and in
14 His Capacity as Florida Parishes Arena
15 Director; Toni Jean Catalano, Individually
16 and in Her Capacity as Office Manager of
17 Florida Parishes Arena; and Lisa M. Cooley:

18 MOODY LAW FIRM
19 Attorneys at Law
20 Audubon Centre
21 1250 S.W. Railroad Avenue
22 Suite 170
23 Hammond, Louisiana 70403

24 BY: ALBERT D. GIRAUD
25 (agiraud@cmoodylaw.com)

ALSO PRESENT:

Tanya Carpenter

Reported by:

KATHRYN L. KOVACEVICH
Certified Court Reporter
Registered Professional Reporter
State of Louisiana

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S T I P U L A T I O N

It is stipulated and agreed by and between counsel that the deposition of CHARLES ROBERT "ROBBY" MILLER, JR. is hereby being taken under the Federal Rules of Civil Procedure in accordance with the Rules.

The formalities of reading and signing, sealing and certification are hereby waived. The party responsible for service of the discovery material shall retain the original.

All objections are to be made in accordance with the Federal Rules of Civil Procedure.

* * * * *

KATHRYN L. KOVACEVICH, Certified Court Reporter, Registered Professional Reporter, in and for the State of Louisiana, officiated in administering the oath to the witness.

1 CHARLES ROBERT "ROBBY" MILLER, JR.,
2 PARISH PRESIDENT, TANGIPAHOA PARISH, P. O. BOX
3 216, 206 WEST MULBERRY STREET, AMITE, LOUISIANA
4 70422, after having been first duly sworn,
5 testified on his oath as follows:

6 EXAMINATION BY MR. MAUTERER:

7 Q. Good morning, Mr. Miller. My name is
8 Steve Mauterer. We just met. It's a pleasure
9 to meet you.

10 Have you ever been deposed before, sir?

11 A. It's been a number of years ago, like
12 decades.

13 Q. Decades. Okay.

14 So just to refresh your recollection on
15 what the process is, if you already know this,
16 I apologize. But just for the record, it will
17 refresh your recollection.

18 Of course, this is a question and
19 answer session; and everything that we're doing
20 today is being taken down by Ms. Kathy, who's
21 the court reporter to my right.

22 You understand that so far?

23 A. Yes.

24 Q. And, of course, while I understand and
25 you may understand head nods and shakes and

1 other mannerisms and things like that,
2 Ms. Kathy can't take that down.

3 A. Okay.

4 Q. So while I'm not going to say, you
5 can't head shake or anything, as long as you
6 also verbalize your responses, I'd appreciate
7 it.

8 A. Okay.

9 Q. You're doing quite well so far. I
10 would ask that you give -- sometimes I will
11 pause in my questioning. You probably noticed
12 that already just a minute ago. Just wait
13 until I'm finished completely asking my
14 question before you respond.

15 We want a clean transcript where it's
16 question, answer, question, answer; and we
17 don't want to talk over each other.

18 Do you understand that?

19 A. Okay.

20 Q. If at any point in time you think or
21 question whether or not I am finished asking my
22 question, it's okay, you're not going to insult
23 me to say, Are you done. And I will be happy
24 to say yes, no, or just give me a minute, and
25 let me ask it again.

1 Is that fair?

2 A. Yes, sir.

3 Q. If there's a question that I ask,
4 because it's a poorly worded question or there
5 was a term in it that you don't understand,
6 whatever reason if you do not understand or
7 comprehend the question, would you let me know?

8 A. Yes, sir.

9 Q. If you do answer a question, I'm going
10 to assume you understood the question that I
11 asked.

12 Is that fair?

13 A. Okay.

14 Q. So in preparation for this deposition
15 today, other than maybe talking to your lawyer,
16 which I don't want to know about, did you speak
17 to anyone in preparation for this deposition
18 today?

19 A. In what sense do you mean talked to?

20 Q. Did you talk to anyone, other than
21 Mr. Giraud about you coming here and what your
22 testimony would be today?

23 A. I talked to my wife that I had this on
24 my calendar. I talked to the other folks that
25 are going to be deposed that were all scheduled

1 to come.

2 Q. Who did you speak with that are all
3 scheduled to come that are going to be deposed?

4 A. I saw Joe Thomas this morning. I
5 talked to Kelly Wells yesterday. Last week we
6 met with Toni Jean, Kelly. Andy Currier is
7 aware. Just, again, that we all know that
8 we're scheduled to come.

9 Q. And what time of day did you speak to
10 Kelly Wells yesterday?

11 A. About 7:30 last night.

12 Q. And what did you talk about?

13 A. He just told me how long the deposition
14 was.

15 Q. Did he discuss any of the content of
16 the deposition or the questions that he was
17 asked?

18 A. Generally, but nothing -- nothing that
19 was earthshaking to me.

20 Q. What do you recall, if anything, about
21 the general content of what Mr. Wells told you?

22 A. It was long.

23 Q. Okay.

24 Other than the length?

25 A. He -- isn't it hearsay, if I start

1 saying what Kelly said?

2 I mean, you know, it was just long.
3 And he went through the whole thing. He said
4 it was what he expected. Nothing. No gotcha's
5 and no -- out of the -- other than -- no
6 gotcha's or anything that he didn't expect.

7 Q. Did he give you any examples of any of
8 the questions that I asked?

9 A. I don't remember specifics.

10 Q. Did he reference any of the documents
11 that might have been presented to him during
12 the deposition?

13 A. I mean, he did say something about an
14 E-mail or a text. I don't remember which one
15 it was, that he felt like you didn't -- that
16 you took out of context.

17 So he was real clear on making sure the
18 whole context was in.

19 Q. How long did the conversation take
20 place?

21 A. Five minutes.

22 I can look if you want.

23 Q. Well, you're under oath. So I'm going
24 to take your word for it that that was five
25 minutes.

1 So you're here -- Mr. Miller, you're
2 the Parish President; correct?

3 A. Yes.

4 Q. And how long have you been the Parish
5 President of Tangipahoa?

6 A. Since January 11, 2016.

7 Q. How many terms have you served?

8 A. I'm in the third.

9 Q. It's my understanding that your third
10 term ends in 2027; is that correct?

11 A. Actually, the second Monday of January
12 2028.

13 Q. Is there going to be a fourth term?

14 A. Possibly.

15 Q. Is that allowed under the Parish
16 Charter?

17 A. No. There's an election in May that
18 would -- could give us one more term.

19 Q. So generally just describe for me what
20 are your duties as the Parish President?

21 A. By the Charter of Tangipahoa Parish, I
22 am the Chief Executive Officer of Tangipahoa
23 Parish, the business of the Parish.

24 Q. Are there any departments or anything
25 that come underneath you?

1 A. Everything in Tangipahoa Parish
2 Government: Economic Development; Workforce;
3 Public Works; the Arena; the Health Unit, our
4 portion of the Health Unit; Permitting;
5 Planning; Litter Abatement; Blighted Property.

6 And I'm sure I'm leaving stuff out.

7 Q. Is it fair to say that anything that
8 doesn't involve the legislative process, which
9 would be the Parish Council's job; right?

10 A. Yes.

11 Q. That would come under your purview?

12 A. Yes. They make the ordinances and the
13 rules and regs, and we administer them.

14 Q. Do you have anyone that works under you
15 as a Chief Administrative Officer?

16 A. Joe Thomas.

17 Q. How long has he served in that
18 position?

19 A. Roughly 10 years. He came on shortly
20 -- I don't know the exact date -- but a couple
21 or a few months after, three or four months
22 after we took office.

23 Q. To your knowledge, did the Parish have
24 a Chief Administrative Officer prior to your
25 election?

1 A. Did not.

2 Q. Why did you decide to appoint a Chief
3 Administrative Officer?

4 A. I thought it was a better way to manage
5 the Parish's business.

6 Q. And what responsibilities does the
7 Chief Administrative Officer have?

8 A. He tends to have day-to-day, and is at
9 places when I can't be and/or we're at two
10 different places handling business for the
11 Parish.

12 Q. Does he directly report to you?

13 A. Yes.

14 Q. Now, these other departments that you
15 started listing, Permitting, of course, the
16 Florida Parishes Arena that we're here talking
17 about --

18 A. Yes.

19 Q. -- do they directly report to you?

20 A. They report to Joe. The chain of
21 command goes -- all the men up through Joe to
22 me.

23 Q. Is it permissible, I mean, the
24 government -- Parish Government is not like the
25 military, as I understand.

1 So is it permissible to jump the chain
2 of command and go directly to you?

3 A. Sure.

4 Q. There's no prohibition for one of your
5 Directors of your departments to, for whatever
6 reason they feel fit, to bypass the CAO and go
7 to you; correct?

8 A. They can. That's true.

9 Q. Now, we're here to talk about,
10 obviously, the Florida Parishes Arena.

11 Who was the Director of the Florida
12 Parishes Arena for the years 2021 to 2024?

13 A. Kelly Wells.

14 Q. When was Kelly Wells' last day; do you
15 know?

16 A. I don't know it off the top of my head.

17 Q. Do you know if it was the beginning,
18 middle, or end of 2024?

19 A. I don't know it off the top of my head.

20 Q. Who is the current Director of the
21 Florida Parishes Arena?

22 A. Lane Taillon.

23 Q. When did he start?

24 A. When Kelly left.

25 Q. Did he start in his -- did he start

1 early, like as a -- I learned yesterday it was
2 Kelly Wells' term -- a protégé of his?

3 A. Yes. We had Lane there with Kelly for
4 some number of months. I don't know how many.

5 Q. And when Mr. Wells retired, that's when
6 Lane became the full director; is that --

7 A. Yes.

8 Q. Now, we're ultimately here to talk
9 about Ms. Carpenter and her company High Road
10 Productions.

11 Are you familiar with Ms. Carpenter?

12 A. Yes.

13 Q. You're familiar with High Road
14 Productions?

15 A. Yes.

16 Q. At some point in time in October of
17 2024, we'll get to this, Ms. Carpenter and her
18 company was banned from Florida Parishes Arena.

19 Are you aware of that?

20 A. Yes.

21 Q. Who has the final authority in Parish
22 Government to approve or deny someone being
23 banned from a public building?

24 A. Parish President.

25 Q. Is that something that you -- is that

1 responsibility and that authority to approve or
2 deny someone being banned from a public
3 building something that you would delegate to
4 someone else?

5 A. No.

6 Q. So the decision to ban Ms. Carpenter
7 and her company from the Parish building and
8 the Florida Parishes Arena, that was your
9 decision?

10 A. Yes.

11 Q. How did you come to that decision?

12 A. So I guess eight or nine years of being
13 in office and a couple -- a few times early on
14 of talking to Ms. Carpenter and realizing that
15 in forcing Kelly, the Arena, to continue to
16 work with her trying to keep her happy, trying
17 to make her happy, and then the final straw was
18 the event where we had police departments
19 saying they couldn't control it. It was an
20 unfortunate event. And Ms. Carpenter's actions
21 toward our staff, that was enough.

22 It was a final -- there was no way -- I
23 concluded, there was no way to make her happy.
24 There was no way to be able to ever overcome
25 all of the complaints. It was like sometimes

1 customers just have to move on.

2 And so it was, like, I'm not doing this
3 any more. The ladies that were berated in that
4 event didn't deserve it, and I'd had enough.
5 So I asked our attorney to do the letter.

6 Q. Okay.

7 Anything else before I start asking you
8 some specific questions?

9 A. I'm sure there will be more to come out
10 whenever you start asking.

11 Q. Okay.

12 You said that you were trying to keep
13 Ms. Carpenter happy over the eight or nine
14 years, but she just was full of complaints. I
15 think was your --

16 A. Yes.

17 Q. What was she complaining about over the
18 eight or nine years?

19 A. Anything and everything.

20 Q. Such as?

21 A. From how we talked to her, how we
22 didn't give her her dates, how we didn't have
23 the place ready, that we flooded the place.
24 That we literally flooded it. Whenever it had
25 rained and we know it was rain.

1 Anything and everything that -- that --
2 and never believing anything that we told --
3 that we -- when we stated it.

4 And my -- I can't even remember
5 conversations. Because basically I said, I
6 can't -- I'm not -- I'm not going to be able to
7 convince her. So Joe, you take care of her
8 from now on.

9 That was probably two years in, three
10 years in.

11 Q. How many times have you actually spoken
12 to Ms. Carpenter?

13 A. Maybe three.

14 Q. So over the eight or nine years of
15 complaints, you've only actually spoken to her
16 three times; right?

17 A. Uh-huh. (Affirmative response.)

18 Q. Is that a yes?

19 A. Yes.

20 MR. GIRAUD:

21 Say yes or no out loud.

22 THE WITNESS:

23 Yes.

24 BY MR. MAUTERER:

25 Q. So over the eight or nine years, how

1 would you get the information regarding
2 Ms. Carpenter's complaints; and what they were?

3 A. From our staff.

4 Q. Any staff in particular?

5 A. Kelly Wells, Coach, Andy Currier, Lane
6 Taillon, Jill DeSouge, her friend who came to
7 see me after we did the ban. Various people.

8 Q. And what if --

9 A. And almost every time, I'd be like, I
10 know. Just do our best, just do our best, do
11 our best.

12 Q. And all of these people that you just
13 named, other than I think Ms. Carpenter's
14 friend, who you didn't identify, all of those
15 people are Parish employees; is that correct?

16 A. Yes.

17 Q. What investigation, if any, did you or
18 your office undertake into any of
19 Ms. Carpenter's complaints?

20 A. Investigation? I would ask our staff,
21 you know, what was the basis; and had we done
22 what we needed to to fix it. And they would
23 tell me yes or no or whatever the answer would
24 have been at the time.

25 What we can do and what we can't do.

1 Q. So the yes or no that you received from
2 your staff, would that be a verbal yes or no?

3 A. Yes.

4 Q. Has there ever been any investigation
5 that was conducted and put in the form of a
6 written report?

7 A. Not to me.

8 Well, the last one. It was -- nah,
9 there wasn't an investigation. Never mind.

10 Q. Was there a written report that was put
11 together, a written statement regarding the
12 last one?

13 A. Not that I remember. Maybe, but I
14 don't remember. I don't have it.

15 Q. So we have: Trying to keep her happy
16 over the years and she complained a lot is
17 Number 1; right?

18 Is that fair so far?

19 A. Uh-huh. (Affirmative response.)

20 Q. Yes?

21 A. Yes.

22 Q. The police department that came to an
23 event and couldn't control it, what was that
24 about?

25 A. Whenever there was a -- there was going

1 to be the barrel racing that evening. There
2 was a car show earlier in the day. It was
3 supposed to be over at 2:00 o'clock and be
4 cleared out. And those folks did not leave and
5 started rolling in more.

6 Amite Police and the Sheriff's Office
7 were called, and they were not able to stop it.

8 And it just turned into a terrible
9 situation, which we admittedly know. And our
10 folks were working. I was getting phone calls
11 from our people; and they were, you know,
12 asking the police to get -- to stop it and so
13 forth. And it didn't happen early enough.

14 Q. So the people that were supposed to
15 roll out and leave in the afternoon, as you
16 said, who was supposed to roll out and leave?

17 The car show?

18 A. The car show, yes.

19 Q. Do you know that the car show people
20 started arriving in the early morning?

21 A. That's what I understand.

22 Q. And do you now know that the car show
23 people were there through the evening after
24 dark?

25 A. That's what I am aware of, yes.

1 Q. Did you receive reports that
2 Ms. Carpenter was on site trying to get a hold
3 of Kelly Wells regarding the car show in the --

4 A. Kelly Wells was one of the people that
5 called me. So I don't know that she -- I don't
6 know what her -- Ms. Carpenter's actions were
7 at that -- about that.

8 I know what they were toward our two
9 ladies.

10 Q. And what did Kelly Wells report to you
11 about the car show and the barrel race being
12 there at the same time?

13 A. That the car show was not listening.
14 They weren't leaving. And that, you know, they
15 were trying to get the police to help them to
16 get them cleared out, so everything would go
17 back to settled.

18 Q. Is it your testimony that Kelly Wells
19 called law enforcement?

20 A. No, it's not my testimony. Kelly
21 called me. I don't know who did all the
22 others. They, the group, our -- Kelly, Lane,
23 whatever other employees were on site were
24 working that.

25 Q. Okay.

1 So as we sit here today, within your
2 personal knowledge, you don't know who, whether
3 it was your people or someone else called law
4 enforcement; is that true?

5 A. I don't know which one of our people.

6 All I understood that there were law
7 enforcement -- the group had to have law
8 enforcement, and that law enforcement was
9 there. And the security was there; and that,
10 you know, more was called.

11 I don't know who called. Whether it
12 was the security or our people.

13 Q. Which security was there?

14 A. Amite PD, I believe. I believe that's
15 who it was that, who they hired.

16 Q. So you don't know whether or not, of
17 your personal knowledge, that Amite PD showed
18 up because of calls made by Ms. Carpenter?

19 A. No. Amite PD was hired by the group to
20 be there for the event, for the car show.

21 Q. Okay.

22 So it's your testimony that the car
23 show people hired Amite PD to be there as
24 details officers?

25 A. That's how I remember it.

1 Q. Who told you, or how did you come to
2 that understanding?

3 A. Our staff.

4 Q. And your staff meaning who?

5 Who told you that?

6 A. Either Kelly or Lane.

7 Q. Have you done any investigation
8 following that to find out that Amite PD were
9 there because of someone else not related to
10 your staff calling them?

11 A. You're using the word "investigation."
12 There was a lot of discussion about what
13 happened.

14 I don't know that -- I wouldn't define
15 it as investigation. I guess you could.

16 We talked about within, you know, what
17 happened, what's going on, where we at. And --
18 and our people were talking to the Sheriff's
19 Office. I don't know which ones. Sheriff's
20 Office and Amite PD.

21 We don't -- I don't know if
22 Ms. Carpenter called or not.

23 Q. Okay.

24 Is it your understanding that your
25 people were talking to the Sheriff's Office

1 and/or Amite PD after the event?

2 A. After in -- what do you mean? When it
3 was over?

4 Q. When it was over.

5 A. I don't know that, no.

6 Q. And you don't know what person or
7 persons might have called or communicated with
8 either law enforcement during the event; do
9 you?

10 A. No.

11 But I know our -- from talking -- there
12 -- somebody from our place did. I don't know
13 which ones.

14 Q. And who was in charge of contracting
15 with Ms. Carpenter to have her event on that
16 day?

17 A. Being that Kelly was still the
18 Director, I would say Kelly.

19 Q. And who was responsible for contracting
20 with the car show for that day?

21 A. It would have been Kelly too.

22 Q. And anything that took place on the
23 Florida Parishes Arena grounds, because of
24 those two contracts that day, would that be
25 Kelly's responsibility as well?

1 A. Yes, I would guess.

2 Q. And so as a result of Mr. Wells
3 contracting with those two entities to have
4 events at the same time and --

5 A. They were not -- that's not true.

6 Q. What's not true?

7 A. They were not at the same time.

8 Q. Okay.

9 So explain to me, what is your
10 understanding of not at the same time?

11 A. The car show was supposed to be ending
12 at 2:00, be clear -- 2:00 or 3:00 o'clock. Be
13 cleared out. And then the barrel racing
14 starting after that.

15 Q. Wasn't the barrel race there for two
16 days?

17 A. In the evenings, if it was. I don't
18 know that.

19 Q. Okay.

20 What is your understanding, if any, of
21 when Ms. Carpenter shows up at the Florida
22 Parishes Arena to start getting ready for her
23 shows?

24 Over the past 20 years, what time of
25 day?

1 A. Whenever it was available to her.
2 Sometimes, I -- I don't know that. I don't go
3 sit at the Arena.

4 Q. So you don't know whether or not she
5 shows up around 10:00 o'clock for her shows?

6 A. I know that the car show was not in the
7 Arena. It was in the parking lot, in the
8 front; and so it should have been able to be
9 accessible without any trouble. And that's
10 where the problem came up. It wasn't. The
11 people -- the car show people did not follow
12 the rules and regs that we had put in there
13 place.

14 Q. Okay.

15 So the car show people not following
16 the rules and regs that you -- that your people
17 put in place, is that something attributable to
18 Ms. Carpenter?

19 A. No.

20 Q. Okay.

21 Well, I mean, you would -- I just want
22 to make sure the record is clear.

23 A. It wasn't -- it wasn't that she was
24 upset. We were all upset. We were all -- it
25 was how she responded, how she attacked our

1 people, is what made me -- be the final straw.

2 Q. Okay.

3 So I just want the record to be clear,
4 and I want to understand. So that's what we're
5 here for.

6 When I asked you what some of the
7 reasons were why she was ultimately banned, you
8 listed at least three of them. Trying to keep
9 her happy, she complained a lot, the police
10 department that could not control it, and then
11 acts towards the staff.

12 That's what I have written down.

13 So the police department and not being
14 able to control the event, the car show, that
15 had nothing to do with Ms. Carpenter; right?

16 A. No.

17 Q. So really it's trying to keep her happy
18 with her complaining over the years, and then
19 some act toward the staff?

20 A. Yes.

21 Q. Are the reasons why she was banned from
22 the public building?

23 A. Yes.

24 Q. So what act toward the staff at the car
25 show resulted in her being banned from a public

1 building?

2 A. She was cursing them.

3 Q. Who was she -- I'm sorry, go ahead.

4 MR. GIRAUD:

5 Wait until --

6 Yeah, finish what were you saying,
7 Robby.

8 THE WITNESS:

9 She was cursing them. Went online and
10 berated all of them and all -- I did not see
11 it. I was told that. So I don't know that for
12 sure.

13 And was told that we were working -- we
14 were doing all we could, and it wasn't good
15 enough. And she continued to berate the -- and
16 Toni Jean Catalano and Donna Domiano. And I
17 don't know who else was in there, but those
18 two.

19 Toni especially. She's a sweet little
20 lady. And just -- it wasn't her place to even
21 try and run the -- you know, it wasn't her
22 responsibility anyway. And she was being just
23 cussed at. Toni, she called me crying about
24 it.

25 And I just -- I had enough. It was

1 like --

2 I mean -- nothing I'd ever done,
3 nothing I'd ever tried to do, pushing Kelly,
4 pushing whomever at the Arena, just keep, you
5 know, work to make the shows work, work to make
6 Ms. Carpenter happy. However many dates she's
7 got, try and make them work. Just wasn't ever
8 enough.

9 It was, like, you start cussing our
10 people out, I'm not -- I'm not putting up with
11 that. We don't have to take that.

12 So I made the decision.

13 BY MR. MAUTERER:

14 Q. So you said Toni Jean called you
15 crying?

16 A. Well, I don't know if she called me. I
17 was talking to somebody, and she was in the
18 phone call with us. So I don't know if she
19 specifically called me or if it was Kelly,
20 Lane, Donna. Somebody called me.

21 Q. Somebody called you, when?

22 A. And it could have been Toni Jean
23 herself, but I don't remember that. I don't
24 remember specifically how I got to where I --
25 where Toni Jean was upset. Very upset.

1 Q. So when was the call? Was it the night
2 of --

3 A. The night of that event or during the
4 chaos of the event.

5 Q. Now, during the chaos of the event,
6 isn't it true Toni Jean was in charge of the
7 Florida Parishes Arena?

8 A. No.

9 Q. Kelly Wells was not there; was he?

10 A. I don't know.

11 Q. So in the absence of Kelly Wells, who
12 is in charge of the Florida Parishes Arena?

13 A. If Lane was there or whomever. But
14 Kelly is still in charge.

15 But Toni Jean is not the one who would
16 be trying -- she would have been maybe calling
17 the police or whatever or talking to the -- I
18 don't remember. I think Lane Taillon was on
19 site, if I'm not mistaken; but I don't know
20 that. I'm not going to guarantee that.

21 But no, Toni Jean, no.

22 Q. So I just want to understand as a
23 matter, I guess, of hierarchy. If Kelly Wells,
24 who is the Director is not on site to take care
25 of --

1 A. In today's world with telephones and
2 all that, the directors are always available
3 and can handle their business.

4 Q. Okay. So let me ask my question.

5 If Kelly Wells is not on site or
6 doesn't answer his phone, who is supposed to
7 take care of or handle the business of the
8 Florida Parishes Arena on the night of the car
9 show?

10 A. In that, where we were at that time,
11 with Lane being -- getting ready, you know, in
12 his transition, we were in the transition.
13 Lane would have been the one, in my view.

14 Q. And if Lane couldn't take care of the
15 situation, because Kelly Wells told him not to,
16 who is supposed to take control of the
17 situation at the Florida Parishes Arena?

18 A. You're telling me something I don't
19 know.

20 Who told you Kelly Wells told him not
21 to?

22 MR. GIRAUD:

23 Object as to form. That's fine.

24 BY MR. MAUTERER:

25 Q. So you get a phone call from someone

1 and ultimately are speaking with Toni Jean;
2 correct?

3 A. Yes.

4 Q. What did Toni Jean tell you?

5 A. She was just very upset that this is
6 going on. I just got cussed out. I can't --
7 you know, the police are doing their best. You
8 know, we're trying -- we're trying to get this
9 thing worked out.

10 And I'm just -- I got cussed out by
11 Tanya, and I don't need to do this. Okay.

12 Q. So what words did Tanya --

13 A. I don't remember.

14 Q. -- tell --

15 A. I don't. I didn't ask. She told me
16 she cussed her out.

17 Plus, I don't have a memory that's good
18 enough to tell you everything. I just know
19 that she was not happy. And whenever our
20 people are not happy, it upsets me.

21 Q. Did she describe where this alleged
22 cussing out took place?

23 A. I don't -- no. Don't remember.

24 Q. Did she describe if there were any
25 witnesses to this alleged cussing out?

1 A. There were people. I don't know who
2 they were, but there were others. It was done
3 in front of several people or others. Let's
4 put it that way.

5 Q. Did Ms. Toni Jean identify who those
6 several others were?

7 A. No, not that I can remember right now.
8 She may have. But I don't remember now.

9 Q. So we have, you don't know where the
10 incident took place; and we don't know who --

11 A. At the Arena.

12 Q. And we don't know where in the Arena
13 the alleged incident took place; is that fair?

14 A. Yes.

15 Q. And you don't know who the other people
16 that allegedly witnessed this event are; is
17 that fair?

18 A. I think Donna Domiano is one of them,
19 but I don't know who else.

20 Q. Any members of the public?

21 A. From what I understand, yes; but I
22 don't know who they are.

23 Q. Did you inquire or ask anyone to
24 inquire to identify who the members of the
25 public were that allegedly heard this incident?

1 A. No.

2 Q. Did you ask Toni Jean whether -- what
3 curse words Ms. Carpenter used?

4 A. No.

5 Q. Did you interview Ms. Donna about this
6 alleged incident?

7 A. I wouldn't call it an interview. We
8 all talked -- we talked about it.

9 Q. How did you talk to her? Did you talk
10 to her in person or on the phone?

11 A. Over the next few days, we talked in
12 person several times about that, this event;
13 and how upset they were.

14 Q. Okay.

15 And what did Ms. Donna tell you about
16 this alleged incident?

17 A. What I just said already. That
18 Ms. Carpenter cussed out Toni Jean. And was
19 not happy and was wanting stuff to happen that
20 we were working on trying to make happen and
21 they were -- they were not able to make it
22 happen.

23 Q. So what cuss words did --

24 A. I don't know.

25 Q. -- Ms. Donna tell you that Tanya

1 allegedly used to address Toni Jean?

2 A. I didn't ask, that I remember.

3 Q. So is it fair to say you had two of
4 your employees tell you that Ms. Carpenter
5 cussed out Toni Jean; is that fair?

6 A. Yes.

7 Q. But you don't know what the cuss words
8 were; right?

9 A. Okay.

10 Q. Is that correct?

11 A. I don't remember what they were.

12 I'm not saying they didn't tell me. I
13 don't remember.

14 Q. And --

15 A. If I'd have known I was going to be
16 sitting here, I probably would have done a lot
17 better job.

18 Q. And you don't know who, if any, people
19 witnessed this alleged event, other than Donna;
20 correct?

21 A. I do not know who they are.

22 Q. And other than speaking with Donna and
23 Toni Jean, you didn't perform any other
24 investigation or inquiry into this event;
25 correct?

1 A. No, not -- I wouldn't -- yeah, I'll say
2 that's accurate as far as an official
3 investigation.

4 Q. You didn't call Ms. Carpenter and ask
5 what happened, if anything, during this event;
6 did you?

7 A. Nope.

8 Q. Did you -- so you don't -- so in
9 choosing not to call Ms. Carpenter, when was
10 the first time that you learned that Toni Jean
11 physically assaulted Ms. Carpenter during this
12 event?

13 MR. GIRAUD:

14 Object as to form.

15 THE WITNESS:

16 Never knew that.

17 BY MR. MAUTERER:

18 Q. You never knew that?

19 A. No.

20 Q. Okay.

21 It's an allegation --

22 A. I heard it -- I read it in her
23 deposition. I mean, her -- whatever that was,
24 deposition.

25 MR. GIRAUD:

1 Complaint?

2 BY MR. MAUTERER:

3 Q. Complaint.

4 A. Complaint.

5 Q. So the first time that you learned that
6 Ms. Toni Jean physically assaulted --

7 A. Allegedly.

8 MR. GIRAUD:

9 Yeah, that's the nature of my objection
10 as to form.

11 Just because it's in the Complaint
12 doesn't make it a fact.

13 MR. MAUTERER:

14 Just like --

15 MR. GIRAUD:

16 I understand.

17 But the way you worded your question,
18 as if it's a fact.

19 MR. MAUTERER:

20 Well, we've been hearing a lot about
21 what -- no comment. I'm just going to leave it
22 at that.

23 BY MR. MAUTERER:

24 Q. So the first time you learned that,
25 Ms. Carpenter's side of the story, was in the

1 Complaint; isn't that true?

2 A. Yes.

3 Q. Now, you told me that one of the two
4 issues that was the reason why you ultimately
5 decided to ban Ms. Carpenter from a public
6 building was that she -- you couldn't please
7 her, she was unhappy, she complained a lot.

8 Are you aware that the Florida Parishes
9 Arena and Ms. Carpenter have been sued before?

10 A. Yes.

11 Q. And are you aware of the allegations of
12 the lawsuits?

13 A. Vaguely.

14 Q. Are you aware that there was a man that
15 was killed at the Arena?

16 A. Yes.

17 Q. And are you aware that one of the
18 issues in that case was the Florida Parishes
19 Arena failing to put up the proper sign, as
20 required by State law to absolve the Arena and
21 the promoters and participants under the Equine
22 Law?

23 A. No.

24 Q. You don't know that that was one of the
25 issues in that case?

1 A. No.

2 I know that we didn't lose.

3 Q. When you say you didn't lose, is that
4 because the Parish and/or its insurance company
5 didn't pay any money?

6 A. That's what I understand.

7 Q. Is that because the contracts between
8 the Florida Parishes Arena and the promoters
9 require that all the promoters indemnify the
10 Arena?

11 A. Yes.

12 Q. So whether or not a plaintiff proves or
13 doesn't prove their case, it's the promoters
14 insurance company that pays the settlement; is
15 that your understanding?

16 A. Yes.

17 Q. And as a result of that, the resolution
18 of that case, did you ever become aware that
19 Ms. Carpenter was complaining to Kelly Wells
20 that he had the incorrect signs that did not
21 comply with State law posted at the Florida
22 Parishes Arena?

23 A. That seems vaguely familiar. Something
24 like that.

25 Q. After someone was killed at the Arena

1 and you learned about Ms. Carpenter complaining
2 about the incorrect signs, what, if anything,
3 did you direct Kelly Wells to do to rectify
4 that situation and put up correct signs?

5 A. Yes.

6 Q. No. What did you do?

7 A. Told him to put up the correct signs.

8 Q. Okay.

9 And did you do anything to follow-up to
10 see whether or not Kelly Wells, in fact, put up
11 the correct signs?

12 A. No. I told him to do it, and I
13 expected it to be done.

14 Q. And did you later learn that Mr. Wells
15 did not put up the correct signs?

16 A. No.

17 Q. Even when the Florida Parishes Arena
18 was sued again for a panel falling on somebody,
19 did you not learn that one of the issues in
20 that case was because of the incorrect signs?

21 A. No.

22 Q. Did you learn that Ms. Carpenter
23 complained about being sued and her insurance
24 company having to pay twice now for issues that
25 were under the control of the Florida Parishes

1 Arena?

2 MR. GIRAUD:

3 Object as to form. You can answer,
4 subject to the objection, if you can.

5 I'm just making a note that's on the
6 record.

7 THE WITNESS:

8 Ask the question again?

9 BY MR. MAUTERER:

10 Q. Did you learn that Ms. Carpenter
11 complained to Parish officials about being sued
12 twice and having to pay or have her insurance
13 company pay settlements, because of issues that
14 were the responsibility of the Florida Parishes
15 Arena?

16 MR. GIRAUD:

17 Object as to form. You can answer, if
18 you can, subject to my objection.

19 THE WITNESS:

20 I don't remember or recall specifically
21 one way or another. There was a lot of
22 complaints from Ms. Carpenter about everything
23 at the Arena.

24 By MR. MAUTERER:

25 Q. And one of the complaints that we're

1 talking about now, would have absolved the
2 Arena and Ms. Carpenter from liability under
3 State law, did you not do anything about it?

4 MR. GIRAUD:

5 Object as to form.

6 First, Counsel's -- I'll object as to
7 form. It's a Federal deposition. That's all I
8 can do is object as to form.

9 If you can answer, subject to my
10 objection, go ahead.

11 THE WITNESS:

12 I didn't even follow the question.

13 BY MR. MAUTERER:

14 Q. I think you've already answered it
15 anyway. Let me move on.

16 Did you learn about a complaint that
17 Ms. Carpenter had regarding the placement of a
18 trailer that was sticking out and could injure
19 someone at the Florida Parishes Arena?

20 A. I remember it from her Complaint.

21 Q. Did you learn about that --

22 MR. GIRAUD:

23 The docu --

24 THE WITNESS:

25 The document.

1 MR. GIRAUD:
2 -- the Pleading?

3 THE WITNESS:
4 The Pleading.

5 Not at the time it happened. I don't
6 remember it.

7 MR. GIRAUD:
8 The word "complaint" has a couple
9 different formats.

10 BY MR. MAUTERER:

11 Q. Was that the first time you learned
12 about her bringing this to the Arena's
13 attention was in the Federal Complaint?

14 A. It brought it back. I don't remember.
15 I don't know. I don't even know when it was.

16 It's a working arena. Things move all
17 the time. There's always stuff going on around
18 there. So --

19 Q. As the Parish President, would you
20 think it's important to have a working arena
21 that is safe to the participants that come to
22 the arena?

23 MR. GIRAUD:
24 Object as to form.

25 THE WITNESS:

1 Yes.

2 MR. GIRAUD:

3 You can answer --

4 THE WITNESS:

5 But it's kind of a smart aleck answer
6 question. But yeah.

7 BY MR. MAUTERER:

8 Q. Well, if someone is raising an issue of
9 safety at the Florida Parishes Arena, would you
10 expect your staff to address that issue of
11 safety?

12 A. Yes. That's why it's a ridiculous
13 question, because we would and we do. And we
14 did.

15 Q. And in this case talking about the
16 tongue of a trailer that's sticking out, the
17 Florida Parishes Arena staff did not address
18 that issue of complaint and someone got
19 injured; isn't that true?

20 MR. GIRAUD:

21 Object as to form.

22 THE WITNESS:

23 I don't know.

24 BY MR. MAUTERER:

25 Q. You don't know whether or not someone

1 got injured?

2 A. I don't remember.

3 Q. After the panel fell on a lady named
4 Terry Jenkins, are you aware of a meeting that
5 Ms. Carpenter had with Kelly Wells and your CAO
6 Joe Thomas and Andy Carrier?

7 A. I'm aware there was a meeting, because
8 of the -- this Federal Complaint.

9 Q. At the time -- and I'll represent to
10 you that occurred in January of 2021.

11 Were you briefed or informed as to the
12 substance of that meeting?

13 A. I don't remember.

14 Q. Were you told that Ms. Carpenter had
15 made some recommendations during that meeting
16 that would have aided in making the Arena more
17 safe?

18 MR. GIRAUD:

19 Object as to form. You can answer,
20 subject to the objection, if you can.

21 THE WITNESS:

22 I don't remember.

23 BY MR. MAUTERER:

24 Q. Do you remember whether or not
25 Mr, Carrier agreed with Ms. Carpenter or not as

1 to her recommendation that would have made the
2 Florida Parishes Arena safe?

3 A. I do not.

4 MR. GIRAUD:

5 Object as to form. You can answer,
6 subject to the objection.

7 THE WITNESS:

8 I do not.

9 BY MR. MAUTERER:

10 Q. When customers, such as Ms. Carpenter,
11 address or bring to your staff's attention
12 issues of safety and concern that they have
13 regarding the Arena, is that ever transmitted
14 to you in writing?

15 A. Maybe. I don't specifically know one
16 way or the other.

17 Q. After a meeting, such as this one in
18 January 2021, did you receive an E-mail or a
19 report from either of your staff members
20 addressing the issues that were discussed in
21 that meeting with Ms. Carpenter?

22 A. I don't remember.

23 Because I expect them to do what they
24 need to do. They don't have to get approval
25 from me to handle their business.

1 Q. And do you ever do anything to
2 follow-up to make sure that your staff are
3 doing what you expect them to do?

4 A. Sure.

5 Q. In this case, did you follow-up at all
6 after a January 2021 meeting to see if your
7 staff was doing -- addressing Ms. Carpenter's
8 concerns or not?

9 A. I just told you, I don't remember them
10 updating me anything about it.

11 I don't have to be informed for them to
12 do their job.

13 Q. Would that have been something that you
14 would have delegated to your CAO to take care
15 of?

16 A. Yes.

17 Q. Does your CAO report to you either in
18 writing as to efforts that he's done during his
19 job -- give you status reports of things that
20 he's done?

21 A. Sometimes.

22 Q. And as it pertains to -- you talked
23 about eight or nine years of complaints that
24 Ms. Carpenter was complaining and not being
25 happy at the Florida Parishes Arena.

1 Is there anything report, E-mails, in
2 writing addressed to you explaining to you what
3 the complaints were?

4 A. I don't remember.

5 Q. Is there anything in writing where your
6 staff or the Florida Parishes Arena staff
7 reported to you what, if anything, they did to
8 try to satisfy the complaints of Ms. Carpenter?

9 A. I don't remember in writing.

10 Q. Are you aware of an event in March of
11 2022 when Ms. Carpenter showed up at the
12 Florida Parishes Arena for one of her
13 contracted events and one of the lights was
14 hanging from a Romex wire over an alleyway?

15 A. No. But I know that we had lights
16 changed out, and the installer obviously didn't
17 do -- I don't know if it's those particular
18 lights. But some lights, LED lights changed
19 out; and they were -- we were having issues
20 with them, and we were working with the
21 electrician to get that resolved.

22 I don't know if that's specifically
23 then, but I know that over time we had that
24 happen.

25 Q. So do you remember when the LED light

1 -- or the lights were changed to LED?

2 A. No.

3 Q. So this incident in March of 2022, do
4 you have any personal knowledge of whether or
5 not this had anything to do with the change
6 over from, I guess, fluorescent lighting to LED
7 lighting?

8 A. No.

9 Q. Were you made aware of Ms. Carpenter
10 arriving at the Arena and having one of the
11 lights hanging from the Romex wire prior to the
12 Federal Complaint?

13 A. No. Not that I remember.

14 Those were things that I would just
15 say, fix it. I mean, it wouldn't even be --
16 just fix it.

17 Q. Do you know who fixed it?

18 A. No.

19 Q. Okay.

20 A. I'm saying I don't even remember it, so
21 I don't know.

22 I'm saying, if I would have been told
23 that and if I remembered, it would be like,
24 okay, it's broken. Fix it. There wouldn't be
25 any question about it.

1 They don't need to ask me that. They
2 know to fix it. Should know to fix it.

3 Q. And since you don't know about the
4 event, this next question is probably the same
5 answer.

6 You don't know that Ms. Carpenter fixed
7 that light; isn't that true?

8 MR. GIRAUD:

9 Object as to form. You can answer --

10 THE WITNESS:

11 No.

12 MR. GIRAUD:

13 While you're looking at that, Steve,
14 let's go off the record for a second.

15 (Off-the-record Discussion.)

16 BY MR. MAUTERER:

17 Q. Were you aware, Mr. Miller, of
18 Ms. Carpenter complaining over the years that
19 she would arrive at the Arena and pens would be
20 locked; and Mr. Wells would not unlock them?

21 A. I'm sure it was -- the complaint was
22 made. I don't specifically remember any of
23 those.

24 Q. These complaints that we're talking
25 about or this type of complaints that we're

1 talking about, are those things that would get
2 to you or your desk?

3 A. Probably not.

4 Q. Is that something that Mr. Wells would
5 have reported to your CAO Mr. Thomas?

6 A. Probably not. But I don't know.

7 Q. So these are things that you would
8 expect Mr. Wells to have just taken care of; is
9 that my understanding?

10 A. Yes.

11 Or the staff. Not him individually.

12 Q. So is it fair to say that you're aware
13 Ms. Carpenter made complaints over the eight or
14 nine years; but the particulars of the
15 complaints, you're not -- you don't have any
16 personal knowledge of?

17 A. Some of them, I guess, I do. I don't
18 have them, like, documented in my head. Didn't
19 take notes about them to do it.

20 It just -- I think the big one was
21 scheduling, that we didn't -- that was, you
22 know, and -- and the personal interactions
23 between her and Kelly, whether they liked each
24 other or didn't like each other. None of
25 that's -- it's, like, I didn't care about all

1 that.

2 Just run a -- you know, you run a good
3 show. We do our deal. And let you -- and try
4 and -- Kelly, do what you've got to do to
5 resolve issues with Ms. Carpenter.

6 Because there's never a -- you couldn't
7 get just an answer. This is a problem. That's
8 a problem. That's a problem. It was always
9 all over the place.

10 Q. How do you know that it's all over the
11 place?

12 A. From a few times I did talk to her.

13 Q. In, I think, the three times that --

14 A. Roughly. I don't -- it could be 20.
15 But it wasn't all of them, because I realized I
16 -- I wasn't getting anywhere.

17 Q. In the three times that you talked to
18 her -- or let me rephrase that.

19 In the times that you spoke to her in
20 any amount, was that -- is it fair to say that
21 those conversations or meetings took place in
22 the past three years?

23 A. No.

24 Q. When did these conversations or
25 meetings take place?

1 A. Probably in the first three years, I
2 was in office.

3 Q. Okay.

4 So --

5 A. There might have been another one, but
6 I don't -- I don't know.

7 Q. Do you recall a meeting with
8 Ms. Carpenter in October of 2023 where your CAO
9 Mr. Thomas, Mr. Wells was there; and it was at
10 the Parish building to discuss dates and other
11 complaints that Ms. Carpenter had?

12 Do you remember that?

13 A. I didn't specifically -- I didn't
14 remember it until they reminded me, and it was
15 in (indicating) there.

16 MR. GIRAUD:

17 The Complaint? The Federal Court
18 Complaint?

19 THE WITNESS:

20 Yeah.

21 MR. GIRAUD:

22 I'm just making it for the record.

23 THE WITNESS:

24 Thank you.

25 MR. GIRAUD:

1 You pointed towards it.

2 THE WITNESS:

3 I did, yes.

4 BY MR. MAUTERER:

5 Q. So when you said they reminded you, who
6 is they?

7 A. Kelly and Joe.

8 Q. And when did they remind you of the
9 meeting that was had back in 2023?

10 A. The other day.

11 MR. GIRAUD:

12 You're talking about the meeting that
13 was here in my office?

14 THE WITNESS:

15 Yes.

16 I don't know if I can talk about that.

17 MR. GIRAUD:

18 Well, if we start to get into things
19 that we talked about, no, that's
20 attorney/client.

21 BY MR. MAUTERER:

22 Q. I'm not asking you --

23 MR. GIRAUD:

24 He's just asking when.

25 THE WITNESS:

1 Yes, that's when it was.

2 BY MR. MAUTERER:

3 Q. Okay.

4 A. I was, like, I did? I said, I don't
5 remember; but okay.

6 And as they talked about it, I was,
7 like, Okay, I vaguely have a memory of
8 something about that. Yeah.

9 Q. So now that your -- let me back up.
10 Because I want to know who they are.
11 Is that Mr. Thomas and Mr. Wells, who
12 reminded you?

13 A. Yes.

14 Q. And after Mr. Thomas and Mr. Wells
15 reminded you of this meeting in October 2023,
16 in any way did your memory get refreshed as to
17 what you remembered of the meeting?

18 A. I just remember we were working on
19 dates. And it was, like, these were the dates
20 available. Pick your dates. Tell us what you
21 want. We're going to work it out.

22 And we kept going in circles and
23 circles and circles. Like, pick the date. And
24 we're going to work it out; and I left, because
25 I had other things to go do.

1 Q. And is that before or after the
2 contracts regarding the dates were tossed
3 across the table at Ms. Carpenter?

4 A. I don't know anything about the dates
5 being -- the paperwork or whatever you said
6 being tossed across the table.

7 Q. Was one of the issues discussed in that
8 meeting, if you recall, Mr. Wells' accusation
9 that the Florida Parishes Arena was losing
10 money because of Ms. Carpenter?

11 A. I don't know.

12 Q. Do you recall Ms. Carpenter challenging
13 Mr. Wells during that meeting and asking, Well,
14 where is all the money that I've been making
15 for the Arena going?

16 A. No.

17 But that wasn't even a -- that wasn't
18 part of my decision. It was like the dates are
19 there. Pick the dates.

20 We're not even talking about whether
21 we're making money or not making money on that.
22 Pick the dates. Tell us what your dates are.

23 Q. So is it your testimony that the only
24 thing that was discussed during this meeting
25 was dates, or is that the only thing you

1 recall?

2 A. Only thing I recall.

3 Q. Was the prices of rental at Florida
4 Parishes Arena discussed during that meeting;
5 do you recall?

6 A. I don't recall.

7 Q. How long did the meeting take place?

8 A. No idea.

9 Q. Why did you participate in this
10 particular meeting?

11 A. Probably because -- I would presume
12 Ms. Carpenter asked that I did. That I would.

13 Q. Are you aware of whether or not
14 Ms. Carpenter had asked you to be a participant
15 in prior meetings?

16 A. No.

17 Q. Prior to October of 2023, had you
18 refused to meet with Ms. Carpenter?

19 A. Not that I'm aware of. I'll attempt to
20 make sure that our people get taken care of
21 whether they -- I don't think they have to meet
22 with me to get their problem solved. So all
23 the times, like, Can you handle it? Get it
24 done. Take care of the person, regardless of
25 who it is.

1 So if they push for it, I -- I will. I
2 mean, I meet with people all the time about
3 various things, that one of our folks could
4 have taken care of.

5 Q. And since at least that -- the October
6 2023 meeting, Ms. Carpenter really wanted you
7 to be in attendance.

8 Did you get the sense that her concerns
9 were not being addressed, so she wanted you
10 present?

11 A. Yeah, I'll -- I'll agree with that.
12 Yes.

13 Q. Do you know -- do you have any
14 recollection as to whether or not your CAO had
15 recommended against meeting with Ms. Carpenter
16 regarding the October meeting?

17 A. Yeah, I don't know. I don't remember.

18 Q. I'm going to show you what I'm marking
19 as Exhibit 1 and see if this refreshes your
20 recollection at all.

21 So this is a series of E-mails, for the
22 record, are Bates numbered TPG-3537 and 3538.

23 At the bottom of the first page is an
24 E-mail of October 11th, 2023 from Joe Thomas to
25 Robby Miller with a CC of Ronda Durbin.

1 Do you see that at the bottom of the
2 page?

3 A. This (indicating) one? Yes.

4 Q. Yes. Okay.

5 And Ronda Durbin, that's your secretary
6 at the time?

7 A. She is our executive administrator.

8 Q. And it says, I recommend --

9 A. Assistant, rather. Excuse me.

10 Q. Sorry.

11 At the bottom it says, I recommend not
12 meeting with her. She can send her thought
13 last to Kelly or Ms. Toni.

14 Is that right?

15 A. I see it, yes.

16 Q. And that's in response to an E-mail
17 from you at the top or from your executive
18 assistant?

19 A. Uh-huh. (Affirmative response.)

20 Yes.

21 Q. To you, Tanya Carpenter called again
22 this morning requesting a call back or
23 scheduled meeting with you.

24 Right?

25 A. Yes.

1 Q. And you agreed, you can schedule a
2 meeting and be sure she knows Joe and Kelly
3 will be attending.

4 Right?

5 A. Yes.

6 Q. Do you know why Mr. Thomas was
7 recommending to you that you not meet with her?

8 A. No. I don't recall.

9 Q. But despite his recommendation, you
10 still went forward and had a meeting; correct?

11 A. Yes.

12 MR. GIRAUD:

13 Do you need some more water?

14 THE WITNESS:

15 Yeah, I guess so.

16 MR. GIRAUD:

17 Let me go grab another bottle. Anybody
18 else need anything?

19 (Off the Record)

20 BY MR. MAUTERER:

21 Q. After this October 2023 meeting, did
22 you learn that the contract between the Florida
23 Parishes Arena and Ms. Carpenter changed in any
24 way?

25 A. No, not specifically that.

1 I know that throughout Kelly's last few
2 years and even since, we've worked on
3 contracts. So they could have. But I don't
4 know specifically why.

5 Q. Did you learn --

6 A. Other than those needed to.

7 Q. Did you learn that the rate that she
8 had been charged over the past several years
9 was increased?

10 A. Okay.

11 Q. Did you learn that; yes or no?

12 A. I don't remember.

13 Q. Well, that's fair.

14 Did you learn that her multi-event
15 discount was eliminated from all of her future
16 contracts?

17 A. Okay.

18 No. I don't remember.

19 Q. Did you learn that for the first time
20 in 20 years, she now had to make deposits?

21 A. I don't know they were specifically at
22 Tanya. We were making changes to work on the
23 Arena's operations, period.

24 And it didn't matter who they were. We
25 were applying the way the contracts were

1 supposed to be managed.

2 Q. So do you have any knowledge one way or
3 another whether or not after the October 2023
4 meeting, every contract with any person that
5 wanted to rent the Arena required a deposit?

6 A. Supposed to.

7 Q. And did you do anything following that
8 meeting to look at any future contracts to
9 confirm whether or not everyone was charged a
10 deposit?

11 A. No.

12 Q. The decision of whether to charge a
13 renter a deposit or not, would that have been
14 Mr. Wells' decision?

15 A. Yes. But whatever the rules are, they
16 should have been applied to everybody.

17 Q. When you say "the rules are," what do
18 you mean?

19 Is that the rules that are adopted by
20 the Parish Council?

21 A. Yes.

22 Q. And if the rules adopted by the Parish
23 Council required deposits to be charged
24 uniformly, you would have expected as the
25 Parish President that that would have occurred;

1 correct?

2 A. Yes.

3 MR. GIRAUD:

4 Object as to form.

5 THE WITNESS:

6 Yes.

7 BY MR. MAUTERER:

8 Q. Was one of the changes in the rules and
9 regulations to remove multi-event discounts for
10 everyone that rented Florida Parishes Arena
11 after October of 2023?

12 MR. GIRAUD:

13 Object as to form. You can answer,
14 subject to my objection.

15 THE WITNESS:

16 If that was the -- in the new rules,
17 yes.

18 Rules apply to everyone or no one.

19 BY MR. MAUTERER:

20 Q. So is it fair to say, you don't
21 remember what changes, if any, were made;
22 correct?

23 A. Correct.

24 Q. But if changes were made, you would
25 have expected everyone to be treated the same;

1 is that fair?

2 A. Yes.

3 Q. Does someone in your administration
4 have the role or the job to ensure that the
5 rules are followed fairly for everyone?

6 MR. GIRAUD:

7 In general, or are you talking about
8 the specific?

9 BY MR. MAUTERER:

10 Q. The rules regarding these contracts, is
11 there someone --

12 A. I mean, our accounting to make sure the
13 deposits were there. Joe Thomas is the Chief
14 Administrative Officer of various folks.
15 Making sure Kelly Wells running the Arena, like
16 it's supposed to be.

17 But, I mean, it's -- yeah.

18 And then we have our auditors come in
19 every year and do audits of all of our
20 accountings.

21 Q. If you would learn that the rules and
22 regulations were not uniformly applied to
23 everyone, what, if anything, would you do about
24 it?

25 MR. GIRAUD:

1 Object as to form. You can answer,
2 subject to my objection, if you can.

3 THE WITNESS:

4 Take corrective action.

5 BY MR. MAUTERER:

6 Q. And what type of corrective action
7 would that be?

8 MR. GIRAUD:

9 Object as to form.

10 THE WITNESS:

11 It would be a personnel policy in -- I
12 would -- that we'd just make sure that they
13 were being applied uniformly.

14 BY MR. MAUTERER:

15 Q. Now, you told me a little -- in the
16 beginning of this deposition that one of the
17 issues that you had heard about Ms. Carpenter
18 complaining about was, an incident where she
19 said the Arena had been flooded.

20 Do you remember saying something about
21 that?

22 A. Yes.

23 Q. What, if anything, do you know about
24 that allegation?

25 A. I just remember it being a big deal

1 that we were accused of -- we were accused of
2 flooding it. Not that it rained into the
3 Arena. But it rains into the Arena.

4 Q. Were you aware of whether or not there
5 was a meeting with Ms. Carpenter about it?

6 A. Not specifically.

7 Q. Do you know that a meeting occurred?

8 A. No.

9 I just remember that topic being
10 discussed.

11 Q. And you have stated the conclusion that
12 we didn't flood the Arena or the Arena wasn't
13 flooded by any member of the staff. It was
14 done by another source, rain.

15 How did you come to that conclusion?

16 A. Because it happens still today.

17 Q. Okay.

18 Did someone tell you that the Arena
19 staff did not follow the rain event and put
20 water on the grounds?

21 A. As I recall, yes.

22 Q. Who told you that?

23 A. Don't remember who.

24 Q. Did you view any videos of the Arena to
25 see whether or not --

1 A. I didn't -- sorry.

2 Q. Let me finish.

3 -- following the rain event, if anyone
4 put additional water on the Arena grounds?

5 A. Not that I'm -- I don't know. I have
6 no idea.

7 MR. GIRAUD:

8 He's asking did you look at anything?

9 THE WITNESS:

10 No, I did not look at anything.

11 BY MR. MAUTERER:

12 Q. Do you know when -- what day of the
13 week the rain event took place?

14 A. No.

15 Q. Do you know whether or not there was a
16 show in between the rain event and
17 Ms. Carpenter's?

18 A. No.

19 Q. Have you personally seen anyone's
20 contracts with the Florida Parishes Arena?

21 A. No.

22 MR. GIRAUD:

23 Steve, and this isn't meant to
24 editorialize or rush you in way. But Joe is
25 here.

1 Are you still going to be a good little
2 bit with Robby? Because if so, I was just
3 going to -- this is all off the record.

4 (Off-the-record Discussion.)

5 BY MR. MAUTERER:

6 Q. Still speaking about this meeting
7 regarding the alleged flooding of the Arena,
8 are you aware that Mr. Wells called
9 Ms. Carpenter a liar during that meeting?

10 A. No.

11 Q. If Mr. Wells did call Ms. Carpenter a
12 liar, is that something that you would expect
13 your Director under your administration on how
14 to address a citizen of this State?

15 A. If it was factual.

16 Q. So factual or not, it's okay for a
17 public official in your administration to
18 directly call someone a liar?

19 MR. GIRAUD:

20 Object as to form. You can answer, if
21 you can.

22 THE WITNESS:

23 If it's factual. I would hope that he
24 did it professionally but --

25 BY MR. MAUTERER:

1 Q. Okay.

2 A. We don't have to -- we don't have to
3 move on things that are not facts.

4 Q. Do you expect or would it be expected
5 of employees of your administration to yell at
6 customers of the Parish of Tangipahoa?

7 A. No.

8 Q. And if an employee yelled at a customer
9 of the Parish of Tangipahoa what, if anything,
10 would you expect?

11 A. We handle it as a personnel matter.

12 Q. Was Toni Jean Catalano reprimanded in
13 any way following the April 2024 meeting with
14 Ms. Carpenter for yelling at her during that
15 meeting?

16 MR. GIRAUD:

17 Can you explain --

18 THE WITNESS:

19 You're alleging she yelled at her. I
20 don't know that she did.

21 MR. GIRAUD:

22 Are you talking about the meeting
23 that --

24 MR, MAUTERER:

25 That was on tape that we listened to

1 yesterday.

2 MR. GIRAUD:

3 No, no. Just what -- oh, okay, I'm
4 sorry.

5 The one where Kelly was involved as
6 well?

7 MR. MAUTERER:

8 Correct.

9 MR. GIRAUD:

10 Okay. Just making sure what dates
11 we're talking about.

12 THE WITNESS:

13 I'm not familiar with that. I've never
14 heard that call.

15 BY MR. MAUTERER:

16 Q. Just so the record is clear, let me ask
17 the question; and I think your answer is going
18 to be the same.

19 You've never heard the audio recording
20 of Mr. Wells telling Ms. Carpenter, All you do
21 is lie?

22 A. No.

23 Q. And you haven't heard the audio
24 recording of Toni Jean Catalano yelling at
25 Ms. Carpenter?

1 A. No.

2 MR. GIRAUD:

3 Object as to form.

4 BY MR. MAUTERER:

5 Q. I think I know the answer is going to
6 be the same, but I have to ask it just for
7 clarity of the record.

8 You haven't heard the audio recording
9 where Mr. Wells tells Ms. Carpenter, Because
10 you are a bitch?

11 A. No.

12 Q. Referring to a customer of the Parish
13 of Tangipahoa as a bitch, is that something
14 that you would expect of your or approve of
15 that your Director of the Arena would do?

16 MR. GIRAUD:

17 Object as to form.

18 THE WITNESS:

19 No.

20 BY MR. MAUTERER:

21 Q. Now, it's my understanding following
22 that meeting in April 2024, Kelly was asked to
23 give his last day of employment; is that true?

24 A. I don't know.

25 Q. Is it your testimony that you didn't

1 ask Mr. Wells for his final day of employment
2 following this meeting?

3 A. Correct.

4 I don't remember, is what I'm really
5 saying.

6 Q. Whenever the Parish asks for someone's
7 final day or to inquire when their retirement
8 day is, is that something that would be done in
9 writing?

10 A. Not from me.

11 Q. Do you know who it would come from?

12 A. HR Director.

13 Q. Who is that?

14 A. Roshanda Johnson.

15 Q. Did you become aware of an event in May
16 of 2024 when Ms. Carpenter arrived at the Arena
17 for her contracted event and the lights didn't
18 work?

19 A. No.

20 Q. And on that same day the PA system
21 didn't work, did you become aware of that?

22 MR. GIRAUD:

23 Object as to form.

24 THE WITNESS:

25 No. Don't remember.

1 BY MR. MAUTERER:

2 Q. Under your administration, have you
3 ever banned anyone else from a public building,
4 other than Ms. Carpenter?

5 A. Yes.

6 Q. Who?

7 A. Is that something that's public
8 knowledge that I can tell?

9 I don't even remember his whole name.

10 MR. GIRAUD:

11 If there was an instance then, it's --
12 it would be relevant to this litigation,
13 because of the nature of it.

14 THE WITNESS:

15 It's a gentleman. I can't remember his
16 name.

17 He was a vendor at rodeos and so forth.

18 BY MR. MAUTERER:

19 Q. Does the name Whitney Granger refresh
20 your recollection?

21 A. Yes, sir. That's it.

22 Q. And what, if anything, do you recall
23 that Whitney Granger did warranting his
24 banishment from a public building?

25 A. We had complaints of -- for lack of a

1 better term -- sexual harassment.

2 Q. Sexual harassment --

3 A. Or miss -- miss -- inappropriate
4 comments and so forth.

5 Q. The inappropriate comments were they
6 made to Parish employees or just other
7 citizens?

8 A. I don't remember.

9 Q. Did you have any involvement in -- did
10 you approve the banishment of Whitney Granger
11 from public buildings?

12 A. Yes.

13 Q. Were you involved in any way -- how was
14 the banishment communicated to Mr. Granger?

15 A. Probably from a letter from our
16 attorneys. I don't remember for sure.

17 Q. I'm going to show you what I'm marking
18 as Exhibit 2.

19 Again, Ronda Durbin is your
20 administrative assistant; correct?

21 A. Yes.

22 Q. And this is an E-mail that was
23 forwarded from Lane Taillon to Ronda Durbin in
24 June of 2025.

25 But if you look at the bottom, it's an

1 E-mail from Lane Taillon to Joe Thomas, Brad
2 Cascio, and Kelly Wells dated October 8th,
3 2024, Arena Letter Whitney Granger.

4 It has contents, Due to the incident of
5 verbal harassment that occurred during the
6 Tangipahoa Parish Fair on a particular date,
7 October 5th, 2024, with the members of the
8 Tangipahoa Parish Fair Board, Whitney Granger
9 will incur penalties as follows.

10 And the language is that Whitney
11 Granger, or any subsidiary company or event,
12 will be barred from service at the Florida
13 Parishes Arena and Greater Tangipahoa Parish
14 Government facility located at a particular
15 address.

16 Do you see that?

17 A. Yes.

18 Q. Prior to this letter being sent out and
19 Mr. Granger being barred from service at the
20 Florida Parishes Arena, was he given an
21 opportunity to address whether or not he
22 verbally harassed anyone with anyone at --

23 A. Not with -- not with me.

24 Q. Was he given the opportunity to address
25 with anyone in your administration at all

1 whether or not he verbally harassed anyone?

2 A. Not that I'm aware of.

3 Q. After Mr. Granger was barred from
4 service at the Florida Parishes Arena, was he
5 given the right to appeal that banishment to
6 you?

7 A. I guess not. I haven't talked to him.

8 Q. Was he given the right to appeal the
9 banishment from this public building to the
10 Parish Council?

11 A. I don't know if he was given the right.
12 As far as I know, he hasn't done it.

13 Q. It doesn't -- you would agree with me,
14 though, in the contents of this draft E-mail,
15 it doesn't describe any rights to object to the
16 banishment or appeal to you or the Parish
17 Council; is that fair?

18 A. That's what that document says. I'll
19 agree with you.

20 Q. Okay.

21 So you agree with me that there is no
22 provision in this document that gives him the
23 right or notifies him that he can object to you
24 or the Parish Council; would you agree --

25 A. Correct.

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MR. GIRAUD:
You're talking about the E-mail from --
MR. MAUTERER:
Correct.
MR. GIRAUD:
Okay.

BY MR. MAUTERER:

Q. Now, when you made the decision to ban Ms. Carpenter from the Florida Parishes Arena, did you ask anyone to prepare a letter similar to the one done for Mr. Granger?

A. I don't even remember the order of it happening. So, no.

We asked our attorneys to prepare the letter for Ms. Carpenter, if I'm not mistaken.

Q. So Mr. Granger was banned on October 8th, 2024, and Ms. Carpenter was banned in late October 2024.

Prior to October 2024, has your administration ever banned anyone from a public building?

A. Not that I recall.

Q. So throughout your entire administration, only in October of 2024, did your administration start banning people?

1 A. That's what it appears.

2 Q. Okay.

3 I'm going to show you what I'm marking
4 as Exhibit 3.

5 Exhibit 3, just for the record, is the
6 Certified Mail Envelope and then the October
7 23, 2024 letter from the Moody Law Firm to
8 Tanya Carpenter, High Road Productions, signed
9 by Brad Cascio.

10 Prior to today, have you seen this
11 letter?

12 A. Yes.

13 Q. And did you approve the contents of
14 this letter?

15 A. Yes.

16 Q. And prior to this letter going out to
17 Ms. Carpenter, did you or anyone in your
18 administration give her the ability to discuss
19 any issues that the administration had with her
20 prior to being banned from public buildings?

21 A. Not that I recall.

22 Q. This letter says, Due to a history of
23 uncooperativeness and harassment of staff,
24 public slander, and the inability to
25 effectively conduct business in a professional

1 manner with the Tangipahoa Parish Government
2 employees located at the Florida Parishes
3 Arena, Tanya Carpenter/High Road Productions
4 will incur penalties as follows. And it lists
5 the penalties in the letter.

6 Meaning they're barred from the Arena;
7 correct?

8 A. Yes.

9 Q. So the history of uncooperativeness, is
10 that her complaining over the past eight, nine
11 years as we discussed?

12 A. Yes.

13 Q. And the harassment of staff, is that
14 the alleged incident with Toni Jean?

15 A. That was the final straw.

16 Q. Well, are there any other instances of
17 harassment of staff that you considered when
18 you authorized this letter to be sent?

19 A. I don't have specifics. It was a
20 general that -- complaint and accusing us of
21 not being cooperative to her, no matter what we
22 did on a consistent basis almost -- it seemed
23 like every time she came, I'd get a phone call,
24 Tanya is not happy, blah, blah, blah, blah.

25 Tanya is not happy, blah -- about every

1 time she came.

2 So it was like, obviously, we're not
3 doing a good job. Tanya needs to take her show
4 somewhere else where she can be happy with
5 somebody else.

6 Q. Would you agree or disagree with me
7 that people have the right to complain to their
8 government?

9 A. Yes.

10 Q. And in Tangipahoa Parish, you are the
11 government; correct?

12 A. Yes.

13 Q. And your directors and your CAO is the
14 government; correct?

15 A. Yes.

16 Doesn't mean we can't keep them -- if
17 we can't make them happy, they shouldn't have
18 the opportunity to go somewhere else.

19 Q. But the decision that was made, wasn't
20 to just not rent to her anymore; isn't that
21 correct?

22 A. That's the way I see it.

23 Q. Is it your understanding that this
24 letter tells Ms. Carpenter that she just will
25 not be able to rent the facility anymore?

1 A. Oh, no, no. No, she's banned.

2 Q. Correct.

3 So if you couldn't satisfy the
4 complaints of Ms. Carpenter, why wasn't she
5 just told, we're not going to rent to you
6 anymore?

7 A. Don't know. That was our decision.

8 Q. And the decision was to bar her from a
9 public building and that she can't come to
10 without written permission granted by Certified
11 Letter from the Tangipahoa Parish Government,
12 that was the decision; right?

13 A. Yes.

14 Q. So not only can she not rent the
15 Florida Parishes Arena, she can't even go to
16 events at the Florida Parishes Arena; correct?

17 A. Yes.

18 Q. And we're sitting here going almost two
19 years after this, has Ms. Carpenter ever been
20 given a follow-up letter that says, it's been
21 two years, you can now go back to the Arena?

22 A. No.

23 Q. Is there any plan under your
24 administration to allow Ms. Carpenter to ever
25 step foot in the Florida Parishes Arena again?

1 A. I don't have any -- hadn't been a
2 thought process to determine that or a request.

3 Q. Would you agree with me, sir, that in
4 this letter, there's no notice to Ms. Carpenter
5 of any rights that she may or may not have to
6 appeal to you regarding this decision?

7 A. I guess the letter speaks for itself,
8 sir.

9 Q. So you would agree with me, that
10 there's no notice to Ms. Carpenter in this
11 letter that she had the right to appeal to the
12 Parish Council; correct?

13 A. Correct.

14 Q. In fact, she has no -- according to the
15 letter, she's not provided with notice of any
16 appeal rights at all; isn't that true?

17 A. According to the letter.

18 Q. Other than yourself, who, if anyone,
19 was involved in approving Exhibit 3, the
20 October 23rd, 2024 letter?

21 A. I'm sure Joe Thomas reviewed it.

22 Q. Do you know that from your personal
23 knowledge, or is that just an assumption?

24 A. An assumption.

25 Q. Do you know whether or not Kelly Wells

1 reviewed it?

2 A. I do not.

3 Q. Are there any written policies and
4 procedures with your office that describes to
5 your staff what conditions need to be met for a
6 citizen of the State to be banned from a public
7 building?

8 A. No. I'm not aware.

9 Q. That decision is ultimately on a
10 case-by-case basis made by you; right?

11 A. Yes.

12 Q. And there's no one other than you that
13 can make that decision; isn't that true?

14 A. Correct.

15 Q. Now, I don't want to know the contents
16 of a conversation. I'll put that out there
17 now.

18 But before this letter went out, did
19 you consult with an attorney as to whether or
20 not this letter was legal or not?

21 I mean, it's just a yes or no.

22 I'm not asking you the content of any
23 conversations or advice that you would --

24 MR. GIRAUD:

25 I think that that would come within

1 attorney/client privilege.

2 You're asking him if he asked a
3 specific question to his attorney.

4 MR. MAUTERER:

5 I'll just rephrase it then.

6 MR. GIRAUD:

7 Yeah.

8 BY MR. MAUTERER:

9 Q. Prior to this letter going out, did you
10 meet with Counsel?

11 Whether or not you met with them,
12 that's not privileged.

13 MR. GIRAUD:

14 I agree that that's not privileged.

15 THE WITNESS:

16 Yes.

17 MR. GIRAUD:

18 But any content of any conversation or
19 questions and all, would be clearly protected
20 by attorney/client privilege.

21 BY MR. MAUTERER:

22 Q. What attorney did you meet with?

23 I don't want to know what you talked
24 about, just which attorney.

25 MR, GIRAUD:

1 You can answer that as well.

2 THE WITNESS:

3 Brad Cascio.

4 MR. GIRAUD:

5 As long as you don't get into
6 substance.

7 BY MR. MAUTERER:

8 Q. Did you meet with any other attorney in
9 this office prior to this letter?

10 I don't want to know about it.

11 MR. GIRAUD:

12 I don't know the answer to it. I know
13 it wasn't me. I learned about it in this
14 Complaint.

15 THE WITNESS:

16 I don't remember.

17 BY MR. MAUTERER:

18 Q. After this letter, Exhibit 3, was sent
19 to Ms. Carpenter, people contacted you
20 regarding your decision to banish Ms. Carpenter
21 from the Florida Parishes Arena; isn't that
22 true?

23 A. One did.

24 Q. Okay.

25 Who was that?

1 A. Can I look at my phone?

2 Q. Sure.

3 A. Sandra Morales.

4 Q. A former Tangipahoa Parish Judge came
5 to see you to talk about Ms. Carpenter; isn't
6 that true?

7 A. Who?

8 Q. I'm just asking, did a former
9 Tangipahoa Parish Judge --

10 A. I don't remember. If you tell me a
11 name, it might jog my memory.

12 Who?

13 Q. The Governor of this State called
14 you --

15 A. No.

16 Q. -- to talk about that?

17 A. I do not remember that.

18 Q. Senators called you to talk about
19 Ms. Carpenter, and your decision to banish her
20 from the Florida Parishes Arena?

21 A. I might have. I don't remember
22 specifically.

23 Q. State Representatives called you to
24 talk about that?

25 A. You're saying with a plural. No, I

1 didn't get that many calls. If I got calls, it
2 was one or two.

3 Q. Who called?

4 A. I don't remember, specifically.

5 Q. Did you speak with anyone, other than
6 Ms. Morales, that called you regarding
7 Ms. Carpenter after this letter went out?

8 A. Maybe. I don't remember specifically.

9 Q. You remember speaking with Ms. Morales?

10 A. Yes.

11 Q. Tell me what you remember about that
12 meeting.

13 A. It was in my office in Amite. She told
14 me she was coming without Ms. Carpenter's
15 knowledge. She told me that she -- would I
16 reconsider, and that she understood.

17 I told her that -- I really feel kind
18 of uncomfortable telling you what she said,
19 because she didn't want Tanya to know.

20 But that she understood that Tanya
21 could be very difficult to work with, and that
22 she was just hoping that she could maybe get me
23 to reconsider.

24 And I told her, thank you very much;
25 but no.

1 Q. Ms. Morales even offered to be a
2 liaison between the Parish and Ms. Carpenter;
3 isn't that true?

4 A. Yes.

5 Q. And you told her no?

6 A. That's correct.

7 Q. And when Ms. Morales left the meeting,
8 you walked her out to the car; didn't you?

9 A. I doubt it. I never walk anybody to
10 the car. I walk them to the door.

11 Q. Did you tell Ms. Morales to pass on a
12 message to Ms. Carpenter for you?

13 A. Not that I remember.

14 Q. Let's see if this reflects your
15 recollection.

16 Did you tell Ms. Morales, I don't care
17 who Tanya Carpenter knows or how much pull she
18 thinks she has, I run this Parish, me; and she
19 will not be back?

20 A. Doesn't sound like anything I would
21 say.

22 Q. After you banned Ms. Carpenter from the
23 Florida Parishes Arena, why did you write a
24 letter to NBHA?

25 A. Because that's the Association and that

1 we wanted to make sure that we -- that the
2 Association was still welcome.

3 Q. I'm showing you what I'm marking as
4 Exhibit 4.

5 Is this a letter that you sent to
6 Bailey Nahrgang with the National Barrel Horse
7 Association?

8 A. Yes.

9 Q. And in this letter it says more than
10 just telling the NBHA that it's welcome to
11 participate at the Florida Parishes Arena;
12 doesn't it?

13 A. Yes.

14 Q. In fact, it goes on to tell the NBHA
15 that the decision is the result of years of
16 conflict between Ms. Carpenter and the facility
17 staff culminating in harassment and inability
18 to professionally execute events; isn't that
19 true?

20 A. Yes.

21 Q. Why did you feel the need to put that
22 in a letter to NBHA, just to explain to them
23 that they were welcome to continue having their
24 shows at your Arena?

25 A. So they knew that if there was a show,

1 that Ms. Carpenter wouldn't be able to be
2 associated.

3 Q. It says, This decision was not taken
4 lightly, and considerable efforts have been
5 made in the nine years prior to satisfying
6 Ms. Carpenter.

7 Did you explain to the NBHA what
8 considerable efforts your administration tried
9 to make in the nine years?

10 A. The letter is -- the letter is the
11 letter. That's all we talked to them about.

12 Q. Do you have any knowledge of whether or
13 not Tanya Carpenter is currently associated
14 with NBHA?

15 A. I do not.

16 MR. MAUTERER:

17 Let's take a break and give me a few
18 minutes to consult.

19 MR. GIRAUD:

20 Sure, absolutely.

21 (Off the Record)

22 BY MR. MAUTERER:

23 Q. Mr. Miller, are you aware one way or
24 another of whether or not Mr. Wells and
25 Ms. Carpenter got along during your

1 administration?

2 A. I believe it was explained to me that
3 Kelly felt like they were friends for a number
4 of years, and it finally fell apart.

5 Q. Do you know when it finally fell apart?
6 Around what time period?

7 A. I do not.

8 Q. Are you aware of an instance in 2023
9 where Ms. Carpenter was challenging Mr. Wells
10 as to where all the money was going for the Run
11 for the Pearl event that she put on?

12 A. No.

13 Q. Have you or anybody under your
14 direction prepared any audits or
15 reconciliations of money that Ms. Carpenter's
16 events have made for the Florida Parishes
17 Arena?

18 A. Specifically Ms. Carpenter's events?

19 Q. Correct.

20 A. No. We have audits every year.

21 MR. GIRAUD:

22 The Parish does.

23 THE WITNESS:

24 The Parish has an audit across Parish
25 Government every year.

1 BY MR. MAUTERER:

2 Q. The independent audits that the auditor
3 does?

4 A. Right.

5 MR. GIRAUD:

6 I was going to say, the Parish does.

7 BY MR. MAUTERER:

8 Q. Just so the record is clear, internally
9 within Parish Government, there's never been a
10 reconciliation or audit of just Ms. Carpenter's
11 business with the Parish; is that right?

12 A. Not that I've asked for. Not that I
13 know of.

14 Q. Now, I know you said you haven't seen
15 any of the contracts for rental at the Florida
16 Parishes Arena.

17 Are you aware of any of the insurance
18 conditions or requirements of any of the
19 contracts?

20 A. Not off the top of my head.

21 Q. Do you know whether or not the
22 insurance requirements are supposed to be
23 applied equally to everyone?

24 MR. GIRAUD:

25 Object as to form.

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THE WITNESS:

I would presume they are.

BY MR. MAUTERER:

Q. Do you have any personal knowledge of anyone that was allowed to have less insurance than what their contract called for?

A. I am not.

Q. Do you know a gentleman by the name of Willie Matthews?

A. I do not.

Q. I know you said over eight, nine years Ms. Carpenter would complain about things.

When did you first become aware that she was complaining to Parish officials about issues with the Arena?

A. It seems like I was very new in office, within the first few months; but I can't specifically give you a date and time.

Q. And who would have informed you; and if you don't remember the person, what position of a person would have informed you about the complaints that she was making?

A. If I'm not mistaken, it was actually a phone call or -- a call or meeting with Ms. Carpenter to tell me she was --

1 Q. That she was concerned about some
2 things and complaining about some things at the
3 Arena?

4 MR. GIRAUD:

5 Object as to form.

6 THE WITNESS:

7 Yes.

8 BY MR. MAUTERER:

9 Q. Do you recall what things she was
10 complaining or concerned about?

11 A. Scheduling. If I remember right, it
12 was just stuff that didn't seem to be that big
13 a deal; and that just -- like for me to have to
14 deal with it, I'd call Kelly and ask him, just
15 do what you need to do, make her happy. You
16 know, she's a customer. Make the event happen.

17 Other than -- scheduling tended to be
18 most of the problem.

19 Q. Do you recall whether or not
20 Ms. Carpenter complained about Kelly to you?

21 A. Oh, yes.

22 Q. So she couldn't go to Kelly to complain
23 about Kelly; would that be fair?

24 A. No. I think she complained to Kelly
25 about Kelly.

1 Q. Looking back at Exhibit 3, what public
2 slander did --

3 MR. GIRAUD:

4 I'm telling him what it is.

5 BY MR. MAUTERER:

6 Q. Exhibit 3 is the ultimate letter from
7 the Moody Law Firm banishing --

8 MR. GIRAUD:

9 Just so it's clear for the record that
10 he knows.

11 BY MR. MAUTERER:

12 Q. In the first paragraph one of the
13 reasons for the decision is public slander.

14 What public slander?

15 A. Facebook posts -- social media posts.

16 Q. Do you have an understanding of whether
17 or not it's someone's right to post things on
18 social media?

19 A. If they're factual.

20 Q. And if it's factual or someone's
21 opinion, do you have a knowledge of whether or
22 not they can post something on social media?

23 MR. GIRAUD:

24 Object as to form.

25 BY MR. MAUTERER:

1 Q. Do you?

2 MR. GIRAUD:

3 You can answer, subject to the
4 objection again.

5 THE WITNESS:

6 We have the First Amendment right. You
7 can lie, if you want. Doesn't mean I have to
8 accept it.

9 BY MR. MAUTERER:

10 Q. So based upon -- one of the reasons
11 that was determined as a basis to banish her or
12 ban her from the public building was because
13 she exercised her First Amendment right to post
14 things on social media?

15 MR. GIRAUD:

16 Object as to form.

17 THE WITNESS:

18 No.

19 What she said. I said if it was
20 factual. If it's not factual, I have the
21 ability to either counter it or take action.

22 BY MR. MAUTERER:

23 Q. What investigation, if any, did you do
24 to determine that the posts, if any, were not
25 factual?

1 A. I don't remember specifically what they
2 are today. It's been too long ago.

3 But our -- in that specific event, our
4 efforts were to resolve the problem. Not
5 create more problems.

6 And Ms. Carpenter's mode was to cause
7 more problems. We were trying to solve it.
8 She was not.

9 And so to me, whenever you go on social
10 media and not telling the facts of what was
11 going on, then it's public slander.

12 Q. So to you, if someone goes on social
13 media and does not convey the facts as you see
14 them, that's public slander?

15 MR. GIRAUD:

16 Object as to form.

17 THE WITNESS:

18 The facts as they were. Not as I see
19 them.

20 MR. GIRAUD:

21 Did you note my objection as to form?

22 THE WITNESS:

23 Yes.

24 MR. GIRAUD:

25 No, I'm talking to the court reporter.

1 COURT REPORTER:

2 (Nodded in the affirmative.)

3 MR. GIRAUD:

4 Make sure it's on the record.

5 Anytime he's asked to give an opinion,
6 that's subject --

7 BY MR. MAUTERER:

8 Q. So I kind of want to understand. And
9 I'm not trying to be argumentive in this
10 question. I'm just trying to understand.

11 If it's your opinion that the facts are
12 not factual or the statements she's making are
13 not factual, that's public slander --

14 MR. GIRAUD:

15 Object as to form.

16 BY MR. MAUTERER:

17 Q. -- right?

18 MR. GIRAUD:

19 Object as to form. You can answer,
20 subject to the objection, if you can.

21 And at this point, I think you are
22 getting argumentative, Counsel.

23 THE WITNESS:

24 If you're not telling the facts, it can
25 be public slander.

1 BY MR. MAUTERER:

2 Q. And what do you base that on?

3 MR. GIRAUD:

4 Object as to form.

5 BY MR. MAUTERER:

6 Q. I mean, that's a conclusion that you've
7 made.

8 MR. GIRAUD:

9 Object as to form.

10 MR. MAUTERER:

11 I understand the objection.

12 BY MR. MAUTERER:

13 Q. Just that's a conclusion you made?

14 MR. GIRAUD:

15 Every time you ask a question --

16 THE WITNESS:

17 I don't remember --

18 MR. GIRAUD:

19 Wait, Robby.

20 Every time you ask a question, I need
21 to note an objection as to form to keep the
22 record preserved.

23 Subject to my objection, if you can
24 answer, answer.

25 I'm not instructing you not to answer

1 any questions.

2 THE WITNESS:

3 If I -- I re- -- I don't recall all the
4 specifics of what was said.

5 But the gist of it was, that we were
6 doing nothing to resolve it. And we were doing
7 everything we could to resolve it.

8 And I didn't appreciate that and didn't
9 agree with it. And so we didn't go back on
10 social media. We let it go until we had our
11 discussions about it, and then made our
12 decision.

13 BY MR. MAUTERER:

14 Q. Did you personally review any of the
15 alleged public slander?

16 A. I was shown a few. I didn't have to
17 see it all. I saw enough.

18 Q. At any events that were described on
19 social media, were you in attendance to -- to
20 obtain the facts from your own personal
21 knowledge?

22 A. No. I was not there.

23 Q. So is it fair to say that any facts
24 that you might have come into possession of,
25 was given to you by others; correct?

1 A. Partially. And then video, reviewing
2 video. Our surveillance video of what was
3 going on.

4 Q. What surveillance video did you
5 personally review?

6 A. Our cameras. Watching the car show do
7 what they were doing and not leaving.

8 Q. So any other surveillance video did you
9 review?

10 A. I don't remember any others.

11 Q. And just -- there's different videos.
12 So I want to make sure --

13 MR. GIRAUD:

14 That's why I think he might be confused
15 here. Yeah.

16 BY MR. MAUTERER:

17 Q. Did you review camera video that is
18 from the Florida Parishes Arena regarding the
19 car show; or did you review, like, police
20 officer body cam video?

21 MR. GIRAUD:

22 When he was speaking to Ms. Carpenter,
23 that's how I can tell the difference.

24 THE WITNESS:

25 I would have rev- -- if I remember

1 right, some of it from our video; and then some
2 from people's social media stuff. You know,
3 cameras.

4 But I don't recall any police -- as a
5 matter of fact, I'm almost positive I didn't
6 see any police body cam. Me personally.

7 BY MR. MAUTERER:

8 Q. And any of the video regarding the car
9 show that you reviewed, was any of the video
10 taken of Ms. Carpenter or her barrel racing
11 event?

12 A. Not that I remember. I was looking at
13 how the car show was behaving.

14 Q. How did you see any of the posts, if
15 any, that Ms. Carpenter was making on social
16 media?

17 A. Either Kelly or some of our people
18 showed it to me.

19 Q. Was it posts that were, I guess, tagged
20 to the Florida Parishes Arena Facebook page?

21 A. I don't know.

22 Q. Do you know whether it was posts that
23 were made on Ms. Carpenter's personal page?

24 A. I don't know.

25 Q. Do you know was it posts made by

1 Ms. Carpenter in response to others?

2 A. I don't recall specifically about any
3 of them.

4 Q. But in the letter speaking about public
5 slander in Exhibit 3, is that limited to these
6 posts regarding the September 2024 car show?

7 MR. GIRAUD:

8 Let me object as to form.

9 I don't think that -- I don't think
10 there's been any testimony that was limited to
11 the car show.

12 MR. MAUTERER:

13 That's why I'm asking.

14 THE WITNESS:

15 I don't know. I think it was
16 throughout the time, there were various posts.
17 That was the most prevalent. But there have
18 been posts about anything and everything. How
19 crappy we were for a while.

20 Most of the time, it was either told to
21 me or shown to me.

22 BY MR. MAUTERER:

23 Q. And I think it's safe to assume, but
24 correct me if I'm wrong.

25 When you characterize how crappy we

1 were, she didn't use those words on social
2 media that --

3 A. I don't remember that specifically,
4 but --

5 Q. All right.

6 So whatever Ms. Carpenter was or was
7 not posting, it concerned a department of the
8 Parish of Tangipahoa; correct?

9 A. Yes.

10 Q. And when Ms. Carpenter raised any
11 concerns that she might have had over the years
12 to Mr. Wells or Mr. Thomas or anyone employed
13 by the Parish, is it fair to say that you
14 understood those complaints to be addressed to
15 them as public officials?

16 A. No, not always.

17 Q. Could you give me examples --

18 A. No.

19 Q. -- if you have any --

20 A. Sorry.

21 Q. -- as to what complaints she would have
22 made to them personally?

23 A. No.

24 Q. So Kelly Wells was the Director of the
25 Florida Parishes Arena; correct?

1 A. Yes.

2 Q. And any complaints that Ms. Carpenter
3 made to him about the Arena in which he was the
4 Director, would you agree with me that she was
5 making them to a public official?

6 A. No, not all of them.

7 MR. GIRAUD:

8 Object as to form.

9 THE WITNESS:

10 No.

11 BY MR. MAUTERER:

12 Q. How do you distinguish between
13 complaints that Ms. Carpenter was making to
14 Mr. Wells that were to him as the Director of
15 the Florida Parishes Arena and some complaints
16 that were not?

17 MR. GIRAUD:

18 Object as to form. You can answer,
19 subject to the objection, if you can.

20 THE WITNESS:

21 Because some of them were personal in
22 nature, if I remember right. They were not
23 about his job performance.

24 They were calling him a liar or calling
25 him a thief, in so many words.

1 BY MR. MAUTERER:

2 Q. How did Ms. Carpenter call Mr. Wells a
3 thief, in so many words?

4 MR, GIRAUD:
5 Object as to form.

6 THE WITNESS:
7 Kept asking him about where the money
8 was. Telling him that, you know, that -- when
9 Kelly says we were not making money, whether we
10 were or not, that's really not the point. Had
11 nothing to do with this.

12 And she'd start, the tone was
13 accusatory that he was doing something he
14 shouldn't have been.

15 BY MR. MAUTERER:

16 Q. Was that posted on Facebook?

17 A. I don't remember that.

18 Q. If someone -- if a citizen, a customer
19 that pays the Parish of Tangipahoa money was
20 questioning a public official regarding where
21 the money went that they paid, is that
22 something that you would investigate or look
23 into in any way?

24 MR. GIRAUD:
25 Object as to form.

1 THE WITNESS:

2 In any way? Yes.

3 I mean, I'd make sure our accounting
4 folks were comfortable with everything that was
5 going and how it was going.

6 BY MR. MAUTERER:

7 Q. So from your testimony, it appears that
8 at some point in time Ms. Carpenter was
9 questioning Mr. Wells about the money that she
10 was paying to the Arena and where it was going.

11 Did you order any investigation, audit,
12 or reconciliation to prove to yourself or
13 anyone else that every dollar that
14 Ms. Carpenter paid to the Parish was accounted
15 for?

16 A. I've answered that already. No.

17 Q. Did you or anyone in your
18 administration allow Ms. Carpenter to show you
19 from her records where all her payments went to
20 the Florida Parishes Arena?

21 A. Don't recall a request to do that.

22 Q. So you don't recall whether or not you
23 or someone in your administration requested
24 Ms. Carpenter --

25 A. No. No. That wasn't your question.

1 Your question was, did Ms. Carpenter offer; and
2 no, that doesn't -- I never knew there was a
3 request from Ms. Carpenter.

4 Q. I'm asking two questions, one way and
5 then the other.

6 Did your administration request of
7 Ms. Carpenter to, Hey, if you're questioning
8 our records, can you bring yours in and show
9 us?

10 Did you make that request?

11 A. No.

12 Q. Did Ms. Carpenter make the offer, Hey,
13 I have records that show my deposits that are
14 different from what the Parish is showing. Can
15 I show you my records?

16 Did she make that offer?

17 A. Not that I'm aware of. Not that -- and
18 -- never mind.

19 Q. Did you take Ms. Carpenter's calls when
20 she called you to try to explain anything to
21 you?

22 A. I did early on. And then right
23 (indicating) here, it says in this E-mail, this
24 Exhibit 1, where I said, I'll meet with her.

25 So, yes, I took her calls. Yes, I took

1 her meetings.

2 Q. All of them?

3 A. I don't know that. Again, I said this
4 earlier. Any time somebody calls, I try to let
5 the person who can handle it the best get it
6 handled. If I don't have to be involved to get
7 the issue resolved, it's better than me having
8 to go through -- not for me, for the person.

9 They get it quicker, faster, because
10 I'm not always as easy to get to as the person
11 who is supposed to be handling it.

12 Q. Did you ever walk out of a meeting when
13 Ms. Carpenter said the money was gone?

14 A. I don't recall that.

15 Q. Did you ever walk out of any meeting
16 with Ms. Carpenter prior to the meeting being
17 concluded?

18 A. Maybe the one about the schedules.
19 Like, there are your schedules. Pick them. I
20 got to be somewhere else. I'd already probably
21 run over time, trying to find out the dates
22 that Ms. Carpenter wanted.

23 Q. Prior to Ms. Carpenter being banned
24 from the Florida Parishes Arena, do you have
25 any idea of how many shows she was putting on

1 at the Arena each year?

2 A. I don't know the specific number. It
3 was a lot.

4 Q. Do you know whether or not she was --
5 whether or not she promoted more shows annually
6 than any other promoter?

7 A. I don't know that.

8 Q. Are you aware of any months in a year
9 that Ms. Carpenter wasn't renting the Florida
10 Parishes Arena prior to her being banned?

11 A. I wouldn't know that.

12 Q. Do you know or have any knowledge of
13 what, other than the Arena, Ms. Carpenter was
14 renting?

15 Did she rent RV spaces, stalls,
16 concessions?

17 MR. GIRAUD:

18 On site?

19 MR. MAUTERER:

20 On site.

21 MR. GIRAUD:

22 Okay. Because there are other
23 locations.

24 THE WITNESS:

25 I would presume they were getting

1 rented. I mean, it's available.

2 BY MR. MAUTERER:

3 Q. But you don't have any personal
4 knowledge as to what amenities that were
5 available were actually rented by her at any of
6 her shows; do you?

7 A. I'm pretty sure that all the amenities
8 were available to her. I don't know what her
9 activity was using them.

10 Q. Do you know whether the fees charged to
11 Ms. Carpenter for her events and rentals of any
12 amenities available at the location of the
13 Florida Parishes Arena were payable in cash?

14 A. For a while early on, we were taking
15 cash; and then we went to cashless later. So I
16 don't know where in there it went.

17 Q. You don't know when the Arena --

18 A. I don't remember -- sorry.

19 Q. Let me ask the --

20 MR. GIRAUD:

21 Finish the question first.

22 BY MR. MAUTERER:

23 Q. You do not know when the Arena went to
24 cashless; is that correct?

25 A. I don't remember.

1 Q. Prior to banning Ms. Carpenter from a
2 public building at the Florida Parishes Arena,
3 did you consider any less restrictive
4 penalty -- I'll use the word from the letter --
5 that you could have imposed, other than a
6 banishment?

7 A. No.

8 Q. I think that's all I have.

9 MR. GIRAUD:

10 Robby, under the law with a deposition
11 like this, you have the right to read and sign
12 the transcript after it's prepared; but you
13 can't change anything of substance.

14 We need to let the court reporter know
15 whether or not you're going to exercise that
16 right or whether you're going to waive the
17 right. If you waive the right, the extra step
18 of you reading it first gets bypassed.

19 THE WITNESS:

20 I waive.

21 MR. GIRAUD:

22 I'd waive --

23 THE WITNESS:

24 Thank you.

25 MR. GIRAUD:

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We will waive the right to read and
sign.

(Deposition concluded at or about 12:12
p.m.)

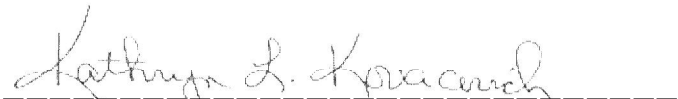
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REPORTER'S PAGE

I, KATHRYN L. KOVACEVICH, Certified Court Reporter, Registered Professional Reporter, in and for the State of Louisiana, the officer, as defined in Rule 28 of the Federal Rules of Civil Procedure and/or Article 1434(B) of the Louisiana Code of Civil Procedure, before whom this proceeding was taken, do hereby state on the Record:

That due to the interaction in the spontaneous discourse of this proceeding, dashes (--) have been used to indicate pauses, changes in thought, and/or talkovers; that same is the proper method for a Court Reporter's transcription of proceeding, and that the dashes (--) do not indicate that words or phrases have been left out of this transcript;

That any words and/or names which could not be verified through reference material have been denoted with the phrase "(spelled phonetically)."



KATHRYN L. KOVACEVICH
Certified Court Reporter
Registered Professional Reporter
State of Louisiana

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C E R T I F I C A T E

This certification is valid only for a transcript accompanied by my original signature and original required seal on this page.

I, KATHRYN L. KOVACEVICH, Certified Court Reporter, Registered Professional Reporter, in and for the State of Louisiana, as the officer before whom this testimony was taken, do hereby certify that CHARLES ROBERT "ROBBY" MILLER, JR., after having been duly sworn by me upon authority of R.S. 37:2554, did testify as hereinbefore set forth in the foregoing one hundred fifteen (115) pages;

That this testimony was reported by me in the stenotype reporting method, was prepared and transcribed by me or under my personal direction and supervision, and is a true and correct transcript to the best of my ability and understanding;

That the foregoing transcript has been prepared in compliance with transcript format guidelines required by statute or by Rules of the Louisiana Certified Shorthand Reporter Board, and that I am informed about the complete arrangement, financial or otherwise, with the person or entity making arrangements for deposition services; that I have acted in compliance with the prohibition on contractual relationships, as defined by Louisiana Code of Civil Procedure Article 1434 and in rules and advisory opinions of the board; that I have no actual knowledge of any prohibited employment or contractual relationship, direct or indirect, between a court reporting firm and any party litigant in this matter nor is there any such relationship between myself and a party litigant in this matter.

That I am not of counsel, not related to counsel or to the parties herein, nor am otherwise interested in the outcome of this matter.

Kathryn L. Kovacevich

KATHRYN L. KOVACEVICH
Certified Court Reporter
Registered Professional Reporter
State of Louisiana

