

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA

* * * * *

TANYA CARPENTER AND HIGH
ROAD PRODUCTIONS, LLC

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

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

* JUDGE CARL J.
* BARBIER

* MAGISTRATE JUDGE
* KAREN WELLS ROBY

* * * * *



Deposition of TONI JEAN C. CATALANO,
taken on Tuesday, March 31, 2026, commencing at
9:56 a.m., in the offices of MOODY LAW FIRM,
Attorneys at Law, 1250 S.W. Railroad Avenue,
Suite 170, Hammond, Louisiana 70403.

I N D E X

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25

	Page
Caption	1
Exhibits	3
Appearances	7
Agreement of Counsel	8
Examination	
STEPHEN M. MAUTERER	9
ALBERT D. GIRAUD	155
* * * * *	
Reporter's Page	157
Certificate	158

1	EXHIBITS:	
2	Catalano No. 1	48
3	Text Message starting with	
4	Date 10/1/2022 to 10/7/2022	
5	Bates No. Carpenter:0120	
6	Catalano No. 2	49
7	Text Message starting with	
8	Date 8/14/2021 to 1/12/2022	
9	Bates No. Carpenter:0107	
10	Catalano No. 3	50
11	Text Message starting with	
12	Date 10/7/2022 to 11/12/2022	
13	Bates No. Carpenter:0121	
14	Catalano No. 4	54
15	Documents pertaining to any of the	
16	payments that Ms. Carpenter made to the	
17	Arena receipts	
18	Bates No. TPG-0000129 to -0000308	
19	Catalano No. 5	59
20	Text Message starting with	
21	Date 11/19/2022 to 1/13/2023	
22	Bates No. Carpenter:0122	
23	Catalano No. 6	67
24	Text Message starting with	
25	Date 6/21/2023 to 6/29/2023	
26	Bates No. Carpenter:0132	
27	Catalano No. 7	70
28	Text Message starting with	
29	Date 7/27/2023 to 7/31/2023	
30	Bates No. Carpenter:0135 to -0137	
31	Catalano No. 8	73
32	Tangipahoa Parish Government	
33	Time Reporting Sheet	
34	Name: Toni Jean Catalano	
35	Dept: Florida Parishes Arena	
36	Pay Period: 7/22/2023 - 8/4/2023	
37	Bates No. Carpenter:0250	
38	Catalano No. 9	78
39	Text Message starting with	
40	Date 8/3/2023 to 9/13/2023	

1	EXHIBITS: (Continued)	
2	Catalano No. 10	82
	E-Mail from Toni Jean Catalano	
3	To: Tanya Carpenter	
	CC: Kelly Wells, Donna Domiano	
4	Date: August 12, 2023	
	Bates No. Carpenter:0919	
5		
	Catalano No. 11	90
6	Text Message starting with	
	Date 9/22/2023 to 9/28/2023	
7	Bates No. Carpenter:0148 to -0150	
8	Catalano No. 12	94
	Text Message starting with	
9	Date 9/28/2023 to 9/29/2023	
	Bates No. Carpenter:0151	
10		
	Catalano No. 13	95
11	E-mail from Tanya Carpenter	
	To: Toni Jean Catalano	
12	Date: October 11, 2023	
	Subject: Re:	
13	Bates No. Carpenter:0060	
14	Catalano No. 14	98
	E-mail from Toni Jean Catalano	
15	To: Tanya Carpenter	
	Date: October 25, 2023	
16	Subject: Updates	
	Bates No. Carpenter:0061	
17		
	Catalano No. 15	102
18	Florida Parishes Arena Contract	
	High Road Productions, LLC/Finally	
19	Friday Barrel Race	
	Date of Application: January 25, 2023	
20	Date to be Reserved: February 3, 2023	
	Bates No. Carpenter:1124 to -1130	
21		
	Catalano No. 16	102
22	Florida Parishes Arena Contract	
	High Road Productions, LLC/NBHA	
23	Barrel Race	
	Date of Application: January 25, 2023	
24	Date to be Reserved: February 4, 2023	
	Bates No. Carpenter:1131 to -1137	
25		

1 EXHIBITS: (Continued)

2 Catalano No. 17 103
 E-mail from Tanya Carpenter
 3 To: Toni Jean Catalano
 CC: Joe Thomas, Kelly Wells
 4 Date: November 7, 2023
 Subject: RE: Updates please confirm
 5 you got this. Thanks.
 Bates No. Carpenter:0926 to -0928

6 Catalano No. 18 110
 E-mail from Tanya Carpenter
 7 To: Toni Jean Catalano
 8 Date: December 15, 2023
 Bates No. Carpenter:0065

9 Catalano No. 19 110
 10 Florida Parishes Arena Contract
 High Road Productions, LLC/Finally
 11 Friday Barrel Race
 Date of Application: July 11, 2024
 12 Dates to be Reserved: August 2 and 9;
 September 20/ November 15 and 22; 2024
 13 Bates No. Carpenter:0213 to -0220

14 Catalano No. 20 111
 Florida Parishes Arena Contract
 15 High Road Productions, LLC/NBHA
 Barrel Race
 16 Date of Application: July 11, 2024
 Dates to be Reserved: August 10;
 17 September 21; November 16, 2024
 Bates No. Carpenter:0221 to -0228

18 Catalano No. 21 112
 19 Florida Parishes Arena Contract
 Alligators on Da Bayou Volume 3 Car Show
 20 Date of Application: August 8, 2024
 Date to be Reserved: September 17, 2024
 21 Bates No. TPG-0000317 to -0000324

22 Catalano No. 22 114
 Markel American Insurance Company
 23 Special Event Liability Insurance Policy
 Declarations Page
 24 Date of Issue: September 3, 2024
 Event Date: September 21, 2024
 25 Named Insured: Willie Matthews

1 EXHIBITS: (Continued)

2 Catalano No. 23 116
 Florida Parishes Arena Contract
 3 3-Dots Team Sorting
 Date of Application: March 5, 2025
 4 Date to be Reserved: March 22, 2025
 Bates No. TPG-0000001 to -0000008

5 Catalano No. 24 117
 6 Acord Certificate of Liability Insurance
 3 Dots, LLC
 7 Policy Eff: 1/16/2025
 Policy Exp: 1/16/2026
 8 Bates No. TPG-0000011

9 Catalano No. 25 118
 Florida Parishes Arena Contract
 10 Crazy Train Production Barrel Race/
 Turn'n Up Thursday's
 11 Date of Application: April 3, 2023
 Date to be Reserved: April 6, 2023
 12 Bates No. TPG-0000040 to -0000047

13 Catalano No. 26 119
 Florida Parishes Arena Contract
 14 Crazy Train Production Barrel Race/
 Turn'n Up Thursday's
 15 Date of Application: August 6, 2024
 Date to be Reserved: August 8, 2024
 16 Bates No. TPG-0000553 to -0000560

17 Catalano No. 27 119
 Florida Parishes Arena Contract
 18 Crossbrand Youth Rodeo
 Date of Application: August 6, 2025
 19 Date to be Reserved: August 16, 2025
 Bates No. TPG-0000325 to -0000332

20 Catalano No. 28 130
 21 Police Officer Body Camera Video

22 Catalano No. 29 148
 E-mail Chain beginning with E-mail
 23 From: Tanya Carpenter
 To: Toni Jean Catalano
 24 CC: Lane Taillon
 Date: November 19, 2024
 25 Bates No. Carpenter:0070

1 APPEARANCES:

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

4 BLUE WILLIAMS, LLC
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7 Suite 900
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 TONI JEAN C. CATALANO 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 TONI JEAN C. CATALANO, POST OFFICE BOX
2 355, INDEPENDENCE, LOUISIANA 70443, after
3 having been first duly sworn, testified on her
4 oath as follows:

5 EXAMINATION BY MR. MAUTERER:

6 Q. Good morning.

7 A. Good morning.

8 Q. Catalano; right?

9 A. Yes.

10 Uh-huh. (Affirmative response.)

11 Q. Just want to make sure I get the last
12 name right.

13 My name is Steve Mauterer. I represent
14 Tanya Carpenter and High Road Productions in a
15 lawsuit that she's brought against you and
16 other Defendants.

17 What did you do to prepare for this
18 deposition?

19 A. Nothing really. I mean.

20 Q. Just showed up this morning?

21 A. I just showed up.

22 Q. Did you have an opportunity, or did you
23 speak with any other deponents that were
24 previously --

25 A. We talk all the time. Because we're

1 all friends; and we work together, so.

2 Q. Did you speak with them about their
3 deposition testimony?

4 A. Not -- not really. Not specifically.
5 I mean, they just kind of mentioned different
6 things; but it was no long conversation or
7 anything.

8 Q. What things were mentioned to you about
9 the depositions that have already taken place?

10 A. How long it took. Some of the
11 questions, like -- I don't remember. Because I
12 wasn't focused on that.

13 So I just -- I wasn't really focusing
14 on that.

15 Q. Who did you speak with?

16 A. Kelly, Lane, Andy.

17 Q. Did you speak to Mr. Thomas?

18 A. No.

19 Q. Mr. Miller?

20 A. No.

21 Q. So since you spoke with them, you may
22 or may not know some of the ground rules about
23 the deposition. So I'm going to go over them
24 with you just to refresh --

25 MR. GIRAUD:

1 I think you should start from scratch.

2 BY MR. MAUTERER:

3 Q. -- refresh your recollection.

4 Okay?

5 A. Okay.

6 Q. Have you ever been deposed before?

7 A. No.

8 Q. So as you can see already, this is a
9 question and answer session; and Ms. Kathy, the
10 court reporter, is taking down everything that
11 either one of us say.

12 You see that?

13 A. Okay.

14 Q. And because she's taking down
15 everything that we say, we're going to try very
16 hard, both of us, not to talk over each other
17 during the deposition.

18 Is that fair?

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

20 Yeah.

21 Q. While I understand uh-huhs and uh-uhs
22 and head nods up and down, and it's perfectly
23 fine to do throughout the deposition, please
24 also say yes or no and answer verbally.

25 Okay?

1 A. Okay.

2 Q. Throughout the deposition, I may ask a
3 question; and you may -- I may all of a sudden
4 just kind of pause for a second, where I'm,
5 like thinking about the next word that comes
6 out of my mouth.

7 Just give it a second or two before you
8 go and answer.

9 A. Okay.

10 Q. So the transcript is clear.

11 A. Okay.

12 Q. Do you understand?

13 A. (Witness nodded head in the
14 affirmative.)

15 Q. If there is a question that I ask you
16 throughout today that you do not understand,
17 because I use a word that's legalese or
18 something and you don't understand it or it
19 just -- it comes out of my mouth like
20 gobbledygook and you don't understand it,
21 please let me know; and I'll try to rephrase
22 it.

23 Okay?

24 A. Okay.

25 Q. If you answer a question today, I'm

1 going to assume that you understood the
2 question.

3 Is that fair?

4 A. Fair.

5 Q. You're an employee of Florida Parishes
6 Arena; right?

7 A. Correct.

8 Q. How long have you been an employee of
9 the Florida Parishes Arena?

10 A. 18 years.

11 Q. And where did you start off in your job
12 role at the Arena?

13 A. I started working in the concession
14 stand.

15 Q. Obviously, you progressed.

16 Where did you go to after the
17 concession stand?

18 A. Then I went to office, helping the
19 other person that was there, which was Jill
20 DeSouge. Helping her.

21 Q. How long were you, I guess, the office
22 helper for Ms. DeSouge?

23 A. Oh, wow. I'm not sure.

24 Because I started part-time, because I
25 was working. I was teaching at the time. And

1 I started part-time. So maybe 14 years
2 part-time and then --

3 Q. Did you work with Ms. DeSouge for 14
4 years?

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

6 Q. Yes?

7 A. Yes.

8 Q. Did you work with her part-time?

9 A. Yes.

10 Q. When you were with the concession stand
11 before that, was that also a part-time
12 position?

13 A. Yes.

14 Q. So what is your current role?

15 A. Office manager.

16 Q. How long have you been in the office
17 manager role?

18 A. Well, four years until '18. It's
19 probably been more than that, because I'm
20 really not sure of the time. I know a total is
21 18 years.

22 Q. So I guess for our purposes the most
23 important time period is how long have you been
24 in your current role as office manager.

25 Do you know that time period?

1 A. Maybe five years, six years.

2 Q. Were you an office manager during COVID
3 in 2020?

4 A. Yes.

5 Q. Were you an office manager before
6 COVID?

7 A. Yes.

8 Q. So it's fair to say at least 2020
9 through current; correct?

10 A. Yes.

11 Q. It might have been a little time
12 before; right?

13 A. Yes.

14 Q. Did you have any employees that worked
15 under you or for you in your role as office
16 manager?

17 A. No.

18 Q. Where is your office, as the office
19 manager?

20 A. It is behind the concession stand.
21 Like concession stand is (indicating)
22 here, and then our office is (indicating) here.
23 It's like a big -- one room, and then it's all
24 divided into offices.

25 Q. So is it fair to say that there is an

1 administrative office at the Arena?

2 A. Yes.

3 Q. And your desk or office space is within
4 that administrative space; is that correct?

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

6 MR. GIRAUD:

7 You need to say yes or no.

8 THE WITNESS:

9 Yes.

10 BY MR. MAUTERER:

11 Q. Do you share that administrative space
12 with anyone else, or is that solely your
13 office?

14 A. That's my office and Alvin Stevens,
15 Coach. We share that office.

16 Q. Did you ever share space with Kelly
17 Wells?

18 A. I did. We all three shared a space at
19 one time.

20 Q. When was that?

21 A. Oh, gosh, '16 maybe. 2016.

22 I'm not sure. I would say 2016, maybe
23 before then.

24 Q. Okay.

25 So after 2016, it was just you and

1 Mr. Stevens?

2 A. Yes. They built Kelly another office,
3 and then me and Alvin Stevens shared that
4 office. Kelly went to his office.

5 Q. Now, we've heard a name throughout some
6 of the other depositions; and I may say the
7 last name incorrectly, Donna Domiano?

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

9 Yes.

10 Q. What role did she have at the Arena, if
11 you know?

12 A. She -- well, she would come and help
13 us. Like, concession when we had events. And
14 we would open concessions, and she would come
15 and help.

16 Q. She was a paid employee of the Arena;
17 correct?

18 A. Well, she works for the Parish.

19 Q. So she was the paid employee of the
20 Parish?

21 A. The Parish, yes.

22 Q. Fair to say, she did not have an office
23 space at the Arena?

24 A. No, she did not.

25 Q. The office that you now share with

1 Mr. Stevens, does it have any cameras outside
2 of the office?

3 A. Yes.

4 Q. Does it have any cameras inside the
5 office?

6 A. No.

7 Q. Since you have been at the Arena for 18
8 years, are you familiar with Tanya Carpenter?

9 A. Yes.

10 Q. And how are you familiar with her?

11 A. She does barrel races, and she was
12 there before me. And just working with her.

13 Q. She was there before you were ever
14 employed there; correct?

15 A. Yes.

16 Q. In the years prior to you taking on the
17 role of office manager, did you have any
18 interactions with Ms. Carpenter at the Arena
19 and her barrel racing?

20 A. We did. I mean, I would make sure -- I
21 would make sure the boys would go out and
22 let -- tell her where they are at and make sure
23 they communicate and stuff like that.

24 Q. Even though you weren't the office
25 manager, were you her contact person at the

1 Arena?

2 A. Yes.

3 Q. Prior to the time that you were the
4 office manager, what kind of duties and
5 responsibilities did you have?

6 A. I just -- I ran the concession stand.

7 Q. So I know there was a period of time
8 where you ran the concession stand?

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

10 Q. And then you also said that there was
11 many years that you were, I guess, an office
12 helper with Jill; correct?

13 A. Yeah.

14 Q. What were your duties and
15 responsibilities --

16 A. With Jill?

17 Q. -- with Jill?

18 A. Just running off papers for her,
19 filing, answering the phone.

20 Q. Did you have any responsibilities to
21 prepare contracts for promoters?

22 A. No. Not when Jill was there.

23 Now, I did when we built the Event
24 Center. I did with the Event Center.

25 Q. But as far as the Arena itself, when

1 Jill was there, that wasn't a duty or
2 responsibility that you had to?

3 A. No.

4 Q. Did you collect any money from
5 promoters or event organizers while Jill was
6 the office manager?

7 A. For the Event Center.

8 Q. Not for the Arena?

9 A. Not for the Arena.

10 Q. Once you became the office manager,
11 were you responsible for preparing the
12 contracts for promoters and event renters?

13 A. Yes.

14 Q. And were you responsible for collecting
15 the fees?

16 A. Yes.

17 Q. Who is above the office manager at the
18 Florida Parishes Arena?

19 A. It would be Kelly.

20 Q. And now is it Mr. Taillon?

21 A. Yes. Lane Taillon, yeah.

22 Q. Now, I know you didn't assume the role
23 of office manager until 2020-ish as we're
24 talking about?

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

1 Q. But you were there for many years at
2 the Arena before; correct?

3 A. Yes.

4 Q. Were you aware of any safety incidents
5 that Ms. Carpenter complained about during her,
6 I guess, tenure in renting the facility?

7 A. I mean, she would call me and tell me,
8 you know, something was broke, a gate was
9 broke. Something needed to be fixed. Things
10 like that.

11 And I would relay them to Coach, who is
12 the supervisor outside.

13 Q. Did other promoters call you regarding
14 safety issues that they had with the Arena?

15 MR. GIRAUD:

16 Object to as form. You can answer,
17 subject to the objection.

18 I may have to do that periodically
19 through the deposition. I'm not telling you
20 not to answer. I'm just doing something I need
21 to note for the record.

22 THE WITNESS:

23 Oh, okay.

24 MR. GIRAUD:

25 So if you can answer his question,

1 subject to my objection. Go ahead.

2 THE WITNESS:

3 Okay.

4 If they had a problem, yes, they would
5 call me or ask me where is Coach; and I would
6 tell them or give them his phone number.

7 BY MR. MAUTERER:

8 Q. Do you recall any specific instances
9 that other promoters would call about that they
10 believe were safety issues at the Arena?

11 MR. GIRAUD:

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

14 THE WITNESS:

15 Dirt needed to be worked. Like I said,
16 I mean, like, if there is a panel that's broke
17 or a panel that's not where it's supposed to
18 be, things like that.

19 But never -- nobody really ever
20 complained about it. I mean, they either did
21 it themselves; or if Coach went out there, they
22 took care of it.

23 BY MR. MAUTERER:

24 Q. Is it fair to say that Ms. Carpenter
25 complained more than others regarding issues

1 that she believed were --

2 A. Yes.

3 Q. When did Coach start?

4 A. Oh, I'm not really sure.

5 Q. Are you aware that at least twice the
6 Arena and Ms. Carpenter have been sued for
7 instances that occurred at the Arena?

8 A. Yes. I am aware of that.

9 Q. Are you aware of any other promoters
10 that have been sued for instances at the Arena?

11 A. Not that I can think of.

12 Q. And, in fact, are you aware of a death
13 that occurred at the Arena during --

14 A. Yes.

15 Q. And what do you recall about that
16 incident, if anything?

17 A. Nothing really. Just that someone was
18 working the gate and a horse ran over him. And
19 then, I know, Acadian was called; and then last
20 thing I heard was, he passed.

21 Q. So other than what you just told me,
22 just the bare facts of what happened, fair to
23 say you don't know any of the details?

24 A. No, I do not.

25 Q. Do you know that that was an incident

1 that occurred at one of Ms. Carpenter's barrel
2 races?

3 A. Yes.

4 Q. Are you aware of an instance where a
5 panel fell on someone at the Arena?

6 A. Yes.

7 Q. And are you aware that a lawsuit was
8 filed against the Arena and Ms. Carpenter for
9 the panel falling off the Arena?

10 A. I heard about it.

11 Q. Is that about the --

12 A. I wasn't --

13 Q. Go ahead. I'm sorry.

14 A. Wasn't really -- I wasn't involved in
15 those.

16 Q. So fair to say, that's pretty much the
17 extent of your knowledge --

18 A. Yes.

19 Q. -- is that it occurred; correct?

20 A. Yes.

21 Q. Are you aware about an incident where a
22 lady tripped over a tongue of a trailer and
23 injured herself?

24 A. Yes.

25 Q. What do you remember about that?

1 A. That's -- saw a trailer was out and the
2 tongue was out and she had tripped and fallen.
3 And then I knew, like, she would -- had called
4 to talk to Kelly one day. And that was it.

5 Q. Are you aware of Ms. Carpenter
6 contacting the Arena prior to the lady falling
7 asking for the Arena to move the trailer?

8 A. Yes. And I told Coach. So that's all
9 I know.

10 Q. Did you do anything to follow-up with
11 Coach to see if he followed your request to
12 move the trailer?

13 A. No, I did not.

14 Q. Fair to say since the trailer wasn't
15 moved, Coach didn't follow your request; right?

16 MR. GIRAUD:

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

19 THE WITNESS:

20 I don't know.

21 BY MR. MAUTERER:

22 Q. Is it fair to say the trailer hadn't
23 been moved at the time that the lady tripped on
24 it?

25 MR. GIRAUD:

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

3 THE WITNESS:

4 I guess so. I mean, I just tell them
5 what people tell me. And -- because I'm
6 inside, I'm not outside; and I don't go out to
7 check things.

8 BY MR. MAUTERER:

9 Q. Are you aware of incidents when
10 Ms. Carpenter showed up at the Arena for her
11 events, and there has been no power at the
12 Arena?

13 A. I mean, lights go out all the time. I
14 mean --

15 Q. Is the RV section separate from the
16 Arena?

17 A. Yes. It's -- like the Arena is
18 (indicating) here, and then it's across the
19 road.

20 Q. Is it out, like, in the grass area?

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

22 Q. Yes?

23 A. Yes.

24 Q. Is there separate power to the RV
25 section?

1 A. Yes.

2 Q. Prior to the Arena and its grounds
3 being turned over to a renter, such as
4 Ms. Carpenter, what, if anything, does the
5 Arena staff do to walk around the Arena and see
6 if it's in a condition ready to be turned over
7 to the renter?

8 A. They go out and check RV boxes. We
9 have our people from maintenance come, and they
10 check and make sure electricity and water is
11 good.

12 Coach goes out. I mean, he's working
13 the grounds. He's got the boys doing different
14 things, locking stalls.

15 Q. So there is a walkthrough process that
16 is --

17 A. Yes.

18 Q. And in the walkthrough process, is it
19 verified that RV power has power?

20 MR. GIRAUD:

21 Object as to form. You can answer,
22 subject to my objection.

23 THE WITNESS:

24 Okay.

25 BY MR. MAUTERER:

1 Q. Is that one of the things that they
2 would go and check?

3 MR. GIRAUD:

4 Same objection.

5 THE WITNESS:

6 They -- they -- I guess they check it.
7 I mean -- now, sometimes a breaker may break --
8 brillow or something. And then they'll call
9 and say, Hey, I don't have electricity at
10 such-and-such a spot. And then I would send
11 Coach out, or either I would call one of our
12 guys from maintenance.

13 They've had to come out times before,
14 like in the nighttime.

15 BY MR. MAUTERER:

16 Q. Who?

17 A. Our maintenance guys.

18 Q. So is it fair to say that this
19 walk-around the Arena you don't personally
20 conduct that; right?

21 A. No, no.

22 Q. So what you're telling me about, they
23 go out -- the staff goes out and looks, checks
24 power, checks other things at the Arena.

25 You don't know whether or not they do

1 that or not; correct?

2 A. I don't. I don't follow them around.

3 Q. Is that something that they're supposed
4 to be doing?

5 MR. GIRAUD:

6 Object as to form. You can answer,
7 subject to my objection.

8 THE WITNESS:

9 They're supposed to.

10 BY MR. MAUTERER:

11 Q. And even at the time that you have
12 become the office manager in 2020-ish, did you
13 go and check to make sure that the staff were
14 walking around --

15 A. No.

16 Q. No?

17 A. That's Coach's position.

18 Q. So if Coach is -- if it's Coach's
19 position to ensure that the staff go around and
20 look at the facility to make sure it's in
21 condition ready to be transferred to a promoter
22 or renter --

23 A. Yes.

24 Q. -- do you know why there was an
25 incident in March of 2022 when one of big Arena

1 lights was hanging from a power line?

2 MR. GIRAUD:

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

5 THE WITNESS:

6 There was a storm that had come
7 through. I don't know. I wasn't out there. I
8 just heard them talking about it.

9 So I don't know the logistics of that.
10 I just heard them talking about a light
11 hanging.

12 BY MR. MAUTERER:

13 Q. Who did you hear talking about it,
14 Coach?

15 A. Coach and Tanya.

16 Q. Did Tanya call you about the light
17 hanging from the Romex wire?

18 A. I don't remember if she called me or
19 not. I really don't.

20 Q. And what, if anything, did the Arena do
21 to fix that light hanging from the Romex wire?

22 A. I don't know.

23 Q. Would that be something that Coach
24 would know?

25 A. Yes.

1 Q. Does Coach not report to you as the
2 office manager about what he did or didn't do?

3 A. No.

4 Q. Does Coach report to you about -- does
5 he report to you at all?

6 A. Sometimes.

7 Q. And what types of things does Coach
8 report to you about versus about what he
9 doesn't?

10 A. The Event Center, he'll let me know
11 that it's set up and ready.

12 Q. Does he -- go ahead. I'm sorry.

13 A. Not too much about the Arena, because I
14 don't have anything to do with the, you know,
15 outside part of the Arena.

16 Q. Coach does?

17 A. Coach does, yes.

18 Q. Is he the Arena manager?

19 A. Yes.

20 Q. How long has Coach been the Arena
21 manager?

22 A. Since he's been there.

23 Q. If he is the Arena manager, why would
24 Ms. Carpenter be calling you as opposed to
25 Coach?

1 A. I don't know.

2 Q. I thought you said, and correct me if I
3 misunderstood, that you were the contact person
4 between the renters or promoters and --

5 A. I am.

6 Q. -- the Arena?

7 A. Usually.

8 But sometimes Coach is outside and
9 they'll see him and they'll tell him what's
10 going on or what, you know, if there's anything
11 wrong.

12 Q. And if he's not around, you are still
13 the contact person between the renter or the
14 promoter and the Arena; correct?

15 A. Yes. And then I get Coach, whatever
16 the problem is, let him know.

17 Q. So do you have any knowledge one way or
18 another that the light that was hanging from
19 the Romex wire was fixed by Ms. Carpenter and
20 the fire department?

21 A. No.

22 Q. Did you receive calls from Mr. Carrier
23 about the light hanging from the --

24 A. No.

25 Q. But it's your understanding that the

1 light was hanging because of a storm; right?

2 A. Yes. From what I remember.

3 Q. So you told me once you became the
4 office manager, you were in charge of contracts
5 between the Arena and promoters and renters;
6 correct?

7 A. Yes.

8 Q. And I think you also told me that you
9 were the person that collected, like, the
10 rental fees?

11 A. Yes.

12 Q. What fees did you collect from
13 Ms. Carpenter for her shows?

14 A. The Arena rental; vendor fees, if she
15 had any vendors; stall shavings; and RVs.

16 Q. So it's your testimony that
17 Ms. Carpenter would collect all of these fees
18 and then pay the Arena?

19 A. Yes.

20 Q. And how were those fees paid?

21 A. Cash, check.

22 Q. Isn't it true that Tanya's payments
23 were made in cash?

24 A. Yes. Some checks were in there. She
25 would -- like vendors, she had a snowball

1 vendor that would pay sometimes in check. Some
2 of the people that bought stall shavings and
3 RVs would pay sometimes in check, and she would
4 just give those to us.

5 Q. How would the -- how would you as the
6 office manager during 2020 to the time
7 Ms. Carpenter last used the facility, how would
8 you reconcile how many vendors she had?

9 A. They would do a spreadsheet and write
10 down how many vendors, how many stalls, how
11 many shavings. She had someone to do that for
12 her.

13 Q. Okay.

14 A. And they would turn in that sheet.

15 MR. GIRAUD:

16 Can I, just for clarity sake, "they"
17 being the person who was renting the facility?

18 The person who was renting the
19 facility?

20 THE WITNESS:

21 Yes. Tanya had --

22 MR. GIRAUD:

23 Just the "they," I'm trying to enter on
24 the record. That's all.

25 THE WITNESS:

1 It was Tanya's people.

2 BY MR. MAUTERER:

3 Q. So it's your testimony that as it
4 pertains to, like, vendor fees, stalls,
5 shavings, things like that, there was a
6 spreadsheet prepared by Tanya or her people;
7 and that was turned over to the Arena?

8 A. Yes.

9 Q. And is that spreadsheet maintained or
10 kept?

11 A. No. It was just like -- I say
12 spreadsheet. It was, like, they would write
13 down on the -- it might be an envelope or a
14 sheet of paper or something; and just write
15 down stall shavings, RVs, and then Arena rental
16 for Friday, Arena rental for Saturday.

17 Q. And whatever Tanya or her people wrote
18 on, whether it was an envelope or a spreadsheet
19 or a piece of paper, that document was not kept
20 by the Arena; correct?

21 A. No.

22 Q. Now, we heard from Mr. Wells last week
23 sometime that there was a receipt book?

24 A. Yes.

25 Q. Like in triplicate?

1 A. Yes.

2 Q. Did you utilize that with --

3 A. Yes.

4 Q. You did?

5 A. Yes.

6 Q. And how was it utilized?

7 A. I would write a receipt and break it
8 all down on there.

9 Q. Did you give a copy of the receipt to
10 Tanya?

11 A. Sometimes, I would. And sometimes, no.
12 Because I'm not there, like, when her barrel
13 races were happening. Boys would be working.
14 Because concession would not be open, because
15 she had vendors, food vendors.

16 So I wouldn't be there.

17 Q. Okay.

18 So if you're not there --

19 A. Yes.

20 Q. -- how does Tanya get the money to the
21 Arena?

22 A. She would give it to one of the boys,
23 and they would put it in my office.

24 Q. Is that how it worked every time that
25 you weren't there?

1 A. Yes. There was a few times that I
2 would call her and say, Hey, how many more you
3 have; and she would tell me.

4 And I say, Let me know when I can come
5 up to collect. So I would drive. When she'd
6 let me know, I would drive from home to go up,
7 collect, put the money in the safe, and then
8 leave.

9 Q. So the way I understand it, there's two
10 methods when you're there?

11 A. Yes.

12 Q. You would personally go get the money
13 and go put it in the safe?

14 A. Yes.

15 Q. And the safe was in that administrative
16 office?

17 A. Yes.

18 Q. If you're not there, then the boys
19 would go get it from her; correct?

20 A. Yes.

21 Q. And where would they bring it?

22 A. They would put it in my desk drawer.

23 Q. If you weren't there and the boys were
24 doing the collection process, did they give
25 Tanya a receipt?

1 A. No.

2 Some receipts may be in her folder too.

3 Q. When you picked up the money from
4 Tanya, did you give her a receipt?

5 A. No. Because that was after the barrel
6 race, if I got it.

7 Q. So she's still paying you money that is
8 due the Arena; correct?

9 A. Right.

10 Q. Whether it's for the rental fee, the
11 vendor fee, or stalls, and things; correct?

12 A. Right.

13 Q. Even though it's after the event, the
14 Arena is receiving the money for the event;
15 correct?

16 A. Right.

17 Q. Is there not a receipt given to
18 Ms. Carpenter at that time for the money she's
19 paying?

20 A. No, not that -- not that day.

21 Q. Is she given a receipt at any time?

22 A. I would put -- when I would write the
23 receipt, I would put it in her folder.

24 Q. And when you mean "in her folder," you
25 mean a folder that's --

1 A. With her contract and everything in it.

2 Q. So a folder that's maintained at the
3 Arena?

4 A. Yes.

5 Q. So she's not given a copy of the
6 receipt; correct?

7 A. Sometimes she was. Sometimes she
8 wasn't.

9 Q. And explain to me when she would
10 receive it, because so far you're explaining to
11 me the process; and I haven't found one where
12 she would get one.

13 So would you please tell me, when she
14 would actually get a receipt?

15 A. She would not -- there was a few times
16 that I wrote a receipt, and I'd gotten one of
17 the boys to bring her -- bring this to Tanya.

18 Q. Okay.

19 A. Then there was times that I didn't see
20 her, so the receipt would go in her folder.

21 Q. Okay.

22 So the only time she would actually get
23 one is, if you gave one to the boys; right?

24 A. Right.

25 Q. And the receipt -- did she have to sign

1 it?

2 A. No.

3 Q. So she didn't have to acknowledge in
4 any way on paper that the amount that the Arena
5 is saying she paid matches what her records
6 are; correct?

7 A. No.

8 Q. What is the purpose of a triplicate
9 receipt, if one of the parties doesn't get a
10 copy of the receipt?

11 A. I -- I don't know. I mean, I was just
12 doing what was always done.

13 Q. Is this a --

14 A. We had a wonderful relationship with
15 Tanya.

16 Q. Okay.

17 A. At one point.

18 Q. How long did that relationship,
19 wonderful relationship last, since you bring it
20 up?

21 A. Probably -- it was a few years. Before
22 COVID.

23 Q. So what changed in the relationship
24 after COVID that it no longer became a
25 wonderful relationship?

1 A. I don't know really. I mean,
2 everything stayed the same on our end, except
3 when Kelly was going to retire; and they put
4 Lane in that position. And they started making
5 changes.

6 Q. When you say "they," who is the they
7 that were making changes?

8 A. The Parish.

9 Q. And when you say "the Parish," is that
10 the Parish Administration, such as like
11 Mr. Miller and Mr. Thomas?

12 A. Well, yeah. I mean, Lane -- when Lane
13 started to take over, then Lane went to them
14 and said this needs to be done, this needs to
15 be done. We need to raise fees. We need to do
16 this.

17 And it's like -- to me that's when it
18 all started.

19 Q. Didn't Lane take over in January of
20 2025?

21 A. Yes. But he -- he took over then. But
22 they had taken Kelly out of dealing with Tanya
23 and put Lane. Lane would be her contact
24 person.

25 Q. Again, two questions in that one.

1 One, you said "they" again. Who is
2 "they" that took Kelly --

3 A. I guess --

4 MR. GIRAUD:

5 Same they?

6 BY MR. MAUTERER:

7 Q. Same they?

8 A. Yeah. I guess the -- Joe Thomas and
9 them.

10 Q. When did Mr. Miller and Mr. Thomas, the
11 Administration, take Kelly from dealing with
12 Ms. Tanya?

13 When did that happen?

14 A. I think it's when there was a
15 conversation and things got heated in that
16 conversation and they said that's it. They
17 were going to -- Lane was going to be the
18 contact person.

19 Q. Was that the conversation in April
20 discussing Ms. Carpenter's belief that someone
21 had rewet the grounds?

22 A. Yes.

23 Q. Is that the same discussion where
24 Mr. Wells called her a liar and a bitch?

25 A. Yes.

1 Q. Is that the same conver- -- this
2 meeting that you got a little -- your volume
3 increased talking to Ms. Carpenter?

4 MR. GIRAUD:

5 I'm going to object as to form. You
6 can answer, subject to the objection.

7 THE WITNESS:

8 I did not -- I was sitting away from
9 the phone. I was trying to get her to
10 understand what I was saying. I was not
11 directing the loud voice at her. I was trying
12 to make her hear me.

13 BY MR. MAUTERER:

14 Q. So when the jury hears the recording of
15 this event -- you understand that there's a
16 recording of it; right?

17 A. Yes.

18 Q. Okay.

19 So when the jury hears the recording of
20 the event, it's your testimony that the volume
21 level used by you was for the purpose of just
22 simply allowing Ms. Carpenter to hear you?

23 A. Yes.

24 Q. And it was following that event in
25 April of 2023 that Kelly was removed from

1 dealing with Ms. Carpenter; right?

2 A. I think so.

3 MR. GIRAUD:

4 2024?

5 I think we're all --

6 MR. MAUTERER:

7 '24?

8 MR. GIRAUD:

9 '24, yeah.

10 MR. MAUTERER:

11 Yeah, '24.

12 BY MR. MAUTERER:

13 Q. So just when I'm talking about this
14 April event with the allegation of the water
15 being rewet on the grounds, it's April 2024, as
16 I've been corrected by everyone in the room.
17 So I want to make sure we're all on the --

18 MS. CARPENTER:

19 I thought I --

20 MR. GIRAUD:

21 Including your client.

22 MR. MAUTERER:

23 That's right. I said everybody.

24 Except the court reporter, I guess.

25 BY MR. MAUTERER:

1 Q. So following that day, she dealt with
2 Mr. Taillon; correct?

3 A. Yes.

4 Q. And are you aware then that in October
5 of 2024, Ms. Carpenter was banned from the
6 facility?

7 A. Yes.

8 Q. So what happened in six months between
9 April of 2024 to October of 2024 that changed
10 the wonderful relationship, as you described
11 it, that the Arena had with Ms. Carpenter to
12 now she's going to be banned from the --

13 A. I really don't --

14 MR. GIRAUD:

15 Wait.

16 Object as to form. You can answer,
17 subject to the objection.

18 But I don't think you were finished
19 with your question yet.

20 BY MR. MAUTERER:

21 Q. -- that caused her to be banned from
22 the facility?

23 MR. GIRAUD:

24 Object as to form. You can answer,
25 subject to the objection, if you can.

1 THE WITNESS:

2 I -- to be honest, I don't know.

3 BY MR. MAUTERER:

4 Q. Did you have any discussions with
5 Mr. Wells, Mr. Taillon, or any of the
6 Administration, including Mr. Miller and
7 Mr. Thomas, regarding a decision to ban
8 Ms. Carpenter from the Arena?

9 A. No.

10 Q. Did you make any complaints to
11 Mr. Wells, Mr. Taillon, or the Administration,
12 Mr. Miller or Mr. Thomas, that you personally
13 had in asking for -- with Ms. Carpenter --
14 asking for her not to be allowed to rent the
15 facility any longer?

16 A. No.

17 Q. Same question, with the end as, did you
18 make any complaints to Mr. Taillon, Mr. Wells,
19 the Administration, Mr. Miller or Mr. Thomas,
20 that Ms. Carpenter should be banned from the
21 Arena?

22 A. No.

23 Q. Now, we'll come back to that a little
24 bit later.

25 But I want to go back to where you were

1 talking about the collection of money between
2 Ms. Carpenter and the Arena.

3 Did you ever tell her to leave the
4 money in a light room?

5 A. Yes.

6 Q. Why was that?

7 A. Because no one was there to collect it.

8 Q. So under that circumstance, it's
9 different from what you told me. You weren't
10 there to collect the money; correct?

11 A. Right.

12 Q. The boys weren't there to collect the
13 money?

14 A. Sometimes they left early.

15 Q. So when neither you or the boys were
16 there, Ms. Carpenter was told to put envelopes
17 of cash in a light room; correct?

18 A. Yeah. There was a special place for
19 it.

20 Q. So, obviously, she didn't get a receipt
21 at that time --

22 A. No.

23 Q. -- for the amount of money; correct?

24 After she put it in the light room, she
25 would send you a picture of the envelopes,

1 correct, to show you that she left it there for
2 you; right?

3 A. Sometimes.

4 Q. I'm going to show you what I'm marking
5 as Exhibit 1.

6 And just for the record, your cell
7 phone is 985-351-5444?

8 A. Yes.

9 Q. Do you see the picture at the top of
10 the page?

11 A. Yes.

12 Q. October 1st, 2022, is that an example
13 of the cash being left --

14 A. Yes.

15 Q. -- in the light room?

16 Yes?

17 A. (Witness nodded head in the
18 affirmative.)

19 Q. Okay.

20 How long would the cash be sitting
21 there before it was collected?

22 A. Later that afternoon.

23 Q. So in this instance, it is October 1st,
24 2022 at 4:34 p.m., later in the afternoon would
25 be when? Like that night?

1 A. I mean, whenever I would head back up
2 there and go get it and put it in the safe.

3 Q. And did you ever verify, particularly,
4 let's talk about this instance, October 1st,
5 2022, we know there's two envelopes of -- two
6 envelopes left for you on a ladder in a light
7 room.

8 Did you ever verify after picking up
9 those envelopes with Ms. Carpenter as to how
10 much were --

11 A. No.

12 MR. GIRAUD:

13 You have to let him finish the
14 question.

15 THE WITNESS:

16 Oh, I'm sorry.

17 MR. GIRAUD:

18 It's not anything you're doing wrong,
19 but it's easier to read the transcript later on
20 that way.

21 THE WITNESS:

22 Oh.

23 BY MR. MAUTERER:

24 Q. I'm going to show you what I'm marking
25 as Exhibit 2.

1 This is a text message between you and
2 Ms. Carpenter of August 14th, 2021. So almost
3 a year before Exhibit 1.

4 Is this another example of leaving the
5 money in the light room?

6 A. Yes.

7 Q. After Ms. Carpenter left the money in
8 2021, did you call her after you counted the
9 money and verify with her how much she was
10 paying the Arena?

11 A. No.

12 Q. How often did this process of leaving
13 the money in a light room occur?

14 A. I don't know.

15 Q. So I'm going to show you what I'm
16 marking as Exhibit 3. This looks like a text
17 message between you and Ms. Carpenter, up at
18 the top, October 8th, 2022. So about seven
19 days after October 1, 2022, that's referenced
20 in Exhibit 1 where she put the money in the
21 light room and sent you a picture of it on the
22 ladder.

23 She's asking you at 2:00 o'clock, Where
24 you want the money; and you respond, Put
25 everything in the light room and make sure the

1 door closes. I will be up there in a little
2 while to get it.

3 Does that refresh your recollection
4 that this process occurred again on October
5 8th, 2022?

6 A. Yes.

7 Q. And following this instance, is it fair
8 to say that you didn't call or verify with
9 Ms. Carpenter after you picked up the money to
10 verify how much money she was paying the Arena?

11 A. No.

12 Q. And if you look at the same exhibit,
13 Exhibit 3, down it looks like a November 12th,
14 2022 conversation between you and Ms. Carpenter
15 you say at 9:00 p.m. on the 12th, November
16 12th, 2022, Did you put everything in the light
17 room.

18 You're referring to the money?

19 A. Yes.

20 Q. And she responds, No, I gave it to the
21 guy.

22 Is that one of the boys?

23 A. Yes.

24 Q. After you received the money from the
25 boys, did you provide Ms. Carpenter a receipt

1 or reconciliation of how much money?

2 A. I mean -- not to her personally. I
3 don't know if there's one in her folder or not.

4 Q. Did Ms. Carpenter ever complain that
5 she needed pens open and Coach was refusing to
6 open them?

7 MR. GIRAUD:

8 Object as to form. You can answer,
9 subject to the objection.

10 THE WITNESS:

11 I don't remember that.

12 BY MR. MAUTERER:

13 Q. If you look at Exhibit 1 again?

14 A. (Witness complying.)

15 Q. There's a text message to you from
16 Ms. Carpenter of October 7th, 2022 at 6:15. I
17 need the holding pens open. Suzie has 17 kids,
18 and I have nowhere to put them out of harm's
19 way. Doing kiddie.

20 Next text, He is refusing to open them.
21 And you respond, Okay.

22 Does this refresh your recollection as
23 to an event where Coach was refusing to open
24 the pens?

25 A. I guess so, if I have it in a text.

1 Q. Does it refresh your recollection that
2 Ms. Carpenter was trying to get the kids out of
3 harm's way at this time?

4 MR. GIRAUD:

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

7 THE WITNESS:

8 Yes.

9 I said, I would call him seems like.

10 BY MR. MAUTERER:

11 Q. And the "him" you said you were going
12 to be calling, that's Coach; right?

13 A. That was Coach, yes.

14 Q. And sometime throughout the deposition,
15 we all kind of know what -- who you're talking
16 about, so just for clarity of the record, I may
17 ask silly questions like that. But I want it
18 to be clear.

19 MR. GIRAUD:

20 We're going to have to go back and read
21 this in the next couple of months, and it might
22 not be as fresh in our minds by that time.

23 BY MR. MAUTERER:

24 Q. So you said a couple times that there
25 might be receipts in Ms. Carpenter's folder;

1 right?

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

3 Yes.

4 Q. We asked in -- do you know what the
5 word "discovery" means in a lawsuit?

6 A. No.

7 Q. Okay.

8 So in a lawsuit, there's a process
9 called Discovery, where I ask you through your
10 attorney to produce documents. And if there's
11 no objections to producing the documents, I get
12 copies of them.

13 Do you understand that so far?

14 A. Yes.

15 Q. In this case, that has -- we've done
16 that.

17 And one of the requests was any
18 documents pertaining to any of the payments
19 that Ms. Carpenter made to the Arena. We
20 received a big stack of documents, which I'm
21 going to mark as Exhibit 4.

22 MR, GIRAUD:

23 That's everything, Steve?

24 I'm just asking.

25 MR. MAUTERER:

1 And it's Bates Numbered by the Parish
2 as TPG 129 through 308.

3 BY MR. MAUTERER:

4 Q. Take a few minutes. I'm not going to
5 ask you questions about every single page
6 that's in this huge stack. But take a few
7 minutes and flip through this and let me know
8 if you identify a receipt for a collection of
9 money for Ms. Tanya that might have been in her
10 folder?

11 A. Well, I can tell you I don't see that
12 happening.

13 There's no way I can remember that.

14 MR. GIRAUD:

15 Look through them first.

16 THE WITNESS:

17 (Complying.)

18 MR. GIRAUD:

19 Look through everything first.

20 BY MR. MAUTERER:

21 Q. Now, that you've flipped page by page
22 through Exhibit 4, is there an example of the
23 receipt in that stack of documents?

24 A. I'm sure there is receipts. But I --

25 MR. GIRAUD:

1 In what you just looked through, he's
2 asking.

3 THE WITNESS:

4 I don't know.

5 BY MR. MAUTERER:

6 Q. So out of this stack of documents that
7 you received and just the stack of documents
8 that you looked at, did you see a copy of the
9 receipt?

10 A. Oh, I did not.

11 Q. When the money is counted --

12 A. Yes.

13 Q. -- do you count it?

14 A. I do.

15 Q. By yourself?

16 A. No.

17 Q. Who counts the money with you?

18 A. I have Kelly, which he did. Coach.

19 Sometimes Donna. It was always two people.

20 Q. And looking through the documents that
21 are Exhibit 4, it appears to me that there is
22 -- looking at the first page, that's Bate
23 numbered 129, there is a handwritten sheet with
24 an amount of money on it, that appears to match
25 the deposit slip that is 130?

1 A. Yes.

2 Q. How was this handwritten sheet that's
3 Exhibit 4 but Bates numbered 129, how is that
4 created?

5 A. So when I count the money, I let the
6 next person count it. Once they count it, then
7 all the money, I just -- whatever it says.
8 That's what I -- I mean, like, how much cash,
9 how many checks, how much checks. And then I
10 put what it's for.

11 Q. This is your handwriting on Exhibit 4,
12 129?

13 A. Yes.

14 Q. The person that was with you to observe
15 the counting or to do a second counting, do
16 they sign off on this form?

17 A. No.

18 Q. Is the person that was there doing the
19 counting identified on the top of the page
20 under your name?

21 A. Under my name, that's the person that
22 made the deposit. Went to the bank.

23 Q. So when I look at 129 at the top of
24 page, it's January 7th, 2020; and it says, Toni
25 Catalano.

1 That's you; correct?

2 A. Yes.

3 Q. Is that name at the top meaning -- what
4 does that indicate?

5 A. It means that I prepared the deposit.

6 Q. Right underneath your name is Kelly
7 Wells on this document; correct?

8 A. Yes.

9 Q. That indicates what?

10 A. He made the deposit. He took the money
11 to the bank.

12 Q. Similarly, in Exhibit 4, 131, so two
13 pages in?

14 A. (Witness complying.)

15 Q. It looks like -- is that the signature
16 of Alvin Stevens?

17 A. Yes.

18 Q. Is that also the person that took it to
19 the bank?

20 A. Yes.

21 Q. So every time we see one of these
22 sheets and the second name on it, that's the
23 person that went to the bank; right?

24 A. Yes.

25 Q. Other than a handwritten sheet and a

1 deposit slip, does the Arena have anything to
2 reconcile the amount of money that Tanya
3 Carpenter gave to the Arena versus the amount
4 of money that the Arena put into its bank?

5 A. I don't think so. I mean --

6 Q. Because the records that Ms. Carpenter
7 would provide whether or not it was written on
8 an envelope or a spreadsheet or some piece of
9 paper, as you've previously testified, that's
10 thrown away; correct?

11 A. Right.

12 Q. Is it fair to say that Ms. Carpenter
13 either gave the money to one of the boys or
14 left it in the light room more often than she
15 would give it directly to you?

16 A. I would say more to the boys.

17 Q. More to the boys?

18 A. Yes.

19 Q. Is it fair to say that you would
20 follow-up up after the event and ask her,
21 Ms. Carpenter, to whom you gave the money?

22 A. No, I would not.

23 Q. I'm going to show you what I'm marking
24 as Exhibit 5. This is a November 13th, 2022
25 text message from you to Ms. Carpenter.

1 MR. GIRAUD:

2 13th or 19th?

3 MR. MAUTERER:

4 It looks like the 13th, November 13th.

5 MR. GIRAUD:

6 Oh, the top.

7 MR. MAUTERER:

8 The top.

9 BY MR. MAUTERER:

10 Q. At 1:07 p.m. from you to Ms. Carpenter,
11 Who did you give Friday money to?

12 A. I guess so.

13 Q. Okay.

14 Did Ms. Carpenter -- we were talking
15 about instances where Ms. Carpenter would show
16 up and perhaps there be issues with the Arena.

17 Do you recall times when she would show
18 up, and there was no lights on at the Arena?

19 A. It would still be daylight. We don't
20 turn them on, if it's daylight. I mean --

21 Q. There's never a time when a promoter or
22 renter would need the lights on at the Arena,
23 even though it was daytime?

24 A. Oh, yes.

25 Q. Okay.

1 A. Yes.

2 Q. So looking at Exhibit 5, there's a text
3 message November 19th, 2022 at 9:43 in the
4 morning. Ms. Carpenter is asking, Need Arena
5 lights on, can't find the boys.

6 And you respond, Coach told them to be
7 there for 10:00.

8 So does that refresh your recollection
9 as to, like, a morning event when she was
10 asking --

11 A. Yes.

12 Q. -- for the lights to be turned on;
13 right?

14 A. Yes.

15 Q. And following on Exhibit 5, 10 minutes
16 later, Ms. Carpenter is texting you at 10:09
17 telling you, No boys yet.

18 They weren't there at 10:00 o'clock, as
19 Coach told them to; correct?

20 A. I guess so.

21 Q. Has Coach ever expressed to you that
22 the boys are not useful?

23 A. No.

24 Q. Do you believe the boys are useful?

25 A. Yes.

1 Q. If you look, continuing on Exhibit 5,
2 by 10:21, Ms. Carpenter is reaching back out to
3 you, People have been here since 9:00, we're
4 starting at 10:00. Well, we were starting at
5 10:00; but running behind. There's no lights
6 and nobody to open stalls. Can't do it all.

7 Do you see that?

8 A. Yes.

9 Q. She's texted again, it looks like 10
10 minutes later, But lights would be nice.

11 I don't see a response from you that
12 immediately follows.

13 Did you respond to her regarding the
14 lights for the stalls?

15 A. I don't remember.

16 Q. It looks like the next text message
17 response from you that day was at 9:16 p.m.
18 asking her, Let me know when you're ready to
19 settle up.

20 Is that referring to receiving the
21 money?

22 A. Yes.

23 Q. Do you recall what, if anything, was
24 done on this day to try to get the lights
25 turned on and stalls open?

1 A. I'm sure the boys showed up at some
2 point. I mean --

3 Q. Fair to say you don't have any personal
4 recollection of what happened; right?

5 A. No.

6 Q. Do you recall whether or not at the end
7 of November of 2022, you advising Ms. Carpenter
8 from that point on, No employees will be
9 provided to open stalls or sell or collect any
10 of the Arena's cash payments for stall and RV
11 rentals or vendor fees. That that was going to
12 be the respons- -- her responsibility?

13 A. Yes.

14 Q. And even though you told Ms. Carpenter
15 that staff were no longer going to be provided,
16 were staff, in fact, provided for her future
17 shows; or was it cut off?

18 A. Well, they were not -- the boys were
19 not going to be able to collect money, things
20 like that. But they would be there to open
21 stalls, RVs.

22 Q. Okay.

23 So from that point forward, they
24 weren't accepting money; but they were there
25 literally to unlock things?

1 A. Yes.

2 Q. Why did that change, that the boys were
3 no longer collecting the money?

4 A. That came from -- Kelly came back from
5 a meeting and told me that.

6 Q. Prior to COVID, did the Arena operate
7 the concession stand for Ms. Carpenter's
8 events?

9 A. I think so. Maybe sometimes. I'm not
10 quite sure. I don't remember exactly.

11 Q. Is it fair to say that it wasn't
12 consistent for every single event?

13 A. Right. There were so many complaints
14 about the food that -- and then we weren't
15 making any money. So we thought it was just
16 best to not do it. Because, I mean, by the
17 time we hire people to run the concession and
18 buy the products and stuff, he --

19 Q. And do you recall -- I'm sorry. Go
20 ahead.

21 MR. GIRAUD:

22 Finish what you were saying.

23 THE WITNESS:

24 Kelly just decided not to do it.

25 BY MR. MAUTERER:

1 Q. Do you recall when Kelly decided not to
2 operate the concession stands for
3 Ms. Carpenter's events?

4 A. I don't. I don't remember. I really
5 don't.

6 Q. And whenever that decision was made, it
7 was up to Ms. Carpenter to get food vendors for
8 her events; correct?

9 A. Yes.

10 Q. And the Parish, the Arena would get a
11 fee from the food vendors; correct?

12 A. Right.

13 Q. And it would be up to Ms. Carpenter to
14 decide how much she would charge the food
15 vendors as long as the Arena got its designated
16 fee; correct?

17 A. Right.

18 Q. Did the Arena check with Ms. Carpenter
19 for every one of her events or prior to every
20 one of her events to see whether or not she
21 needed concessions opened after Mr. Wells
22 decided it wasn't profitable to operate the
23 concession stand?

24 A. No, I think --

25 MR. GIRAUD:

1 I was going to say, I didn't understand
2 the question.

3 MR. MAUTERER:

4 Apparently, she did.

5 THE WITNESS:

6 I think that there may have been a
7 couple times that she was asked, if we were
8 doing concession or she was doing it; and she
9 would say, No, she was doing it.

10 BY MR. MAUTERER:

11 Q. Okay.

12 And were there a couple times that the
13 Parish decided to open concessions on its own?

14 A. Yes.

15 Q. One of those times was for one of her
16 biggest events, the Run for the Pearl; correct?

17 A. Yes.

18 Q. Fair to say that the Arena chose not to
19 operate the concession stands for her smaller
20 events; right?

21 A. Right. Yes.

22 Q. And whenever the Arena wanted to, it
23 would exercise its right to operate the
24 concessions for her larger events; correct?

25 A. Yes.

1 Q. And the Arena would tell Ms. Carpenter
2 that a week before the event; is that right?

3 MR. GIRAUD:

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

6 THE WITNESS:

7 No.

8 BY MR. MAUTERER:

9 Q. The Run for the Pearl was in August of
10 each year; isn't that right?

11 A. Right.

12 Q. I'm going to show you what I'm marking
13 as Exhibit 6. This is a text message between
14 you and Ms. Carpenter starting at the top, June
15 26, 2023 at 1:46 p.m.

16 Texting from you to Ms. Carpenter, What
17 are you doing for concessions for the weekend;
18 and she responds, Working on it; right?

19 A. Correct. Yes.

20 Q. And after you say, Okay. You also
21 text, Hey, Kelly said we cannot do concessions
22 this weekend; but we will have full concessions
23 for Run for the Pearl weekend.

24 Do you see that?

25 A. Yes.

1 Q. And Ms. Carpenter responds, I have food
2 vendors already for Pearl.

3 Do you see that?

4 A. Yes.

5 Q. And you respond to her, We have right
6 of first -- we have first right of refusal;
7 right?

8 A. Yes.

9 Q. So --

10 A. This was from Kelly.

11 Q. I'm sorry?

12 A. I was telling her this, this came from
13 Kelly.

14 Q. So Kelly decided in June of 2023 that
15 he was going to operate or the Parish was going
16 to operate the concessions for Run for the
17 Pearl; correct?

18 A. Yes.

19 Q. But previously, for other events, the
20 Parish did not operate concessions; correct?

21 A. Yes.

22 Q. And it was up to Ms. Carpenter to have
23 her vendors if she wanted to sell food;
24 correct?

25 A. Yes.

1 Q. And for Run for the Pearl where the
2 Parish did not operate a concession stand,
3 isn't it true that you and Donna Domiano would
4 set up a tent and sell chicken salad on
5 croissants for Run for the Pearl?

6 A. No.

7 Q. That didn't happen?

8 A. No.

9 The only time -- Donna had nothing to
10 do with that. There was one time when we
11 weren't doing concession anymore. And I got
12 with Tanya and I said, Hey, do you have a
13 problem with my niece -- I would do it, but it
14 would be for her, to set up a tent and do
15 concession for you. And she said, No, I don't
16 have a problem with that.

17 And yes, I set up out there. Anybody
18 could come -- I mean, whatever she said. If
19 she said, Yeah, you can do it. Yeah, you can
20 do it. If she said, No, then you couldn't do
21 it.

22 But she did agree for that. But, yeah,
23 that --

24 Q. Go ahead. I'm sorry.

25 A. That was -- that wasn't -- that was

1 between me, her, and my niece.

2 Q. Is it your testimony that that occurred
3 only one time?

4 A. I know one. Maybe twice.

5 I know definitely one. Maybe twice.
6 I'm not sure.

7 Q. So we know in June of 2023,
8 Ms. Carpenter is being advised that she can't
9 have vendors for -- food vendors for Run for
10 the Pearl, because the Parish is doing
11 concessions; right?

12 A. Right.

13 Q. And following up the next month, isn't
14 it true that you provided Ms. Carpenter a list
15 of food items that food vendors could not sell
16 at Run for the Pearl?

17 A. Yes. This was all per Kelly.

18 Q. I'm going to show you what I'm marking
19 as Exhibit 7. This is a text message string
20 between yourself and Ms. Carpenter, top part of
21 it, July 28, 2023 at 10:34 a.m., Ms. Carpenter
22 is texting to you, Text me what food I cannot
23 sell. And you respond, Okay.

24 Correct?

25 A. Yes.

1 Q. And then you respond at 12:05, the same
2 day, You cannot sell hamburgers, cheeseburgers,
3 hot dogs, french fries, soft drinks. You can
4 sell tea or water. But water has to be at
5 least \$2, no less. I will have a special for
6 both days chicken salad on croissant and fruit
7 cups.

8 Do you see that?

9 A. Yes.

10 Q. Is that from Mr. Wells?

11 A. Yes.

12 Q. And at the bottom of the page, you're
13 telling Ms. Carpenter that the food vendors
14 have to fill out a form with the price they're
15 charging; and that the Arena gets to approve or
16 disprove the food vendors.

17 Do you recall that?

18 A. Yes.

19 Q. That was the first time Ms. Carpenter
20 had to fill out a form for food vendors;
21 correct?

22 A. I think so.

23 Q. And that was the first time she had to
24 get pre-approval of not only the food; but the
25 price they were charging; correct?

1 A. I think so.

2 Q. And July 28, 2023 is about a week away
3 from Run for the Pearl; isn't that correct?

4 A. I think so, yeah. Because it's August
5 -- first of August, I think.

6 MR. GIRAUD:

7 Steve, we've been going about an hour
8 and a half. Can I get some water?

9 MR. MAUTERER:

10 Yeah, you want to take a break?

11 MR. GIRAUD:

12 Go get some water and go the restroom
13 and stretch our legs.

14 MR. MAUTERER:

15 Sure.

16 Off record at 11:26.

17 (Off the Record)

18 MR. MAUTERER:

19 Back on the record, 11:40.

20 BY MR. MAUTERER:

21 Q. We were talking about, before our
22 little break, Ms. Catalano, the decision of
23 Mr. Wells to open the concession stand for the
24 Run for the Pearl.

25 Do you remember that?

1 A. Yes.

2 Q. And Ms. Tanya Carpenter questioning the
3 forms that she was being required to now fill
4 out for food vendors; right?

5 A. Yes.

6 Q. Fair to say that was the first time in
7 over 17 years, she was required to fill out a
8 food vendor form; correct?

9 A. Yes.

10 Q. Is any part of your office manager work
11 done remotely?

12 A. Yes.

13 Q. How much of your office manager work is
14 done remotely versus being on site at the
15 Arena?

16 A. Well, I could do contracts, answer the
17 phone, answer E-mails.

18 Q. So you're not, for lack of a better
19 term, confined to the Arena or your office; is
20 that fair?

21 A. Yes.

22 Q. I'm going to show you what I'm marking
23 as Exhibit 8.

24 For the record, Exhibit 8 is Carpenter
25 250. It is a time sheet for Ms. Toni Jean

1 Catalano.

2 Exhibit 8 is for the pay period of time
3 7/22/23 to 8/4/23. So the week right before
4 the Run for the Pearl; correct?

5 A. Yes.

6 Q. And who fills those time sheets out the
7 individual employee or someone else?

8 A. So we have time cards.

9 Q. Okay.

10 A. And I go by the time cards.

11 Q. So there's a time card where you
12 clock-in and clock-out?

13 A. Yes.

14 Q. So what is the purpose of this sheet,
15 if the Arena has a time-in/time-out time cards?

16 A. I have to do these sheets and turn in
17 to our payroll person. And this is how, I
18 guess, they figure up the pay.

19 Q. Payroll doesn't use the time cards?

20 A. I turn the time cards in too, yes.

21 Q. What is the reason that a supervisor
22 would have to sign this Time Reporting Sheet,
23 if you know?

24 A. I don't know.

25 Q. So if you look at July 28th, it looks

1 like you worked eight hours regular time on
2 Friday and a half-hour overtime; right?

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

4 Q. Yes?

5 A. Yes. Sorry.

6 Q. On the right side column, there's an
7 Overtime Documentation or Justification.

8 There's nothing marked on the 28th for
9 why you were working overtime.

10 A. Okay.

11 So overtime, anything after an hour --
12 anything an hour over, you have to document.
13 If it's half an hour, 0.75. 0.25, you don't
14 have to document.

15 Q. Okay.

16 So we know July 28th, 2023 was a
17 Friday.

18 In the eight-and-a-half hours that you
19 worked that day, were you working at your
20 office?

21 A. Yes. I very seldom -- the only time I
22 work remotely, during COVID, because we had
23 basically shut down. And I was working
24 remotely.

25 Because, I mean, we weren't there. I

1 mean, we were running. But we didn't have
2 events, but we were still open.

3 And the other time was when they redid
4 our offices.

5 Q. When did they redo your offices? Do
6 you know what year?

7 A. It's been a few years ago. That's when
8 they built Kelly's office.

9 Q. Was it in 2023?

10 A. No. It might have been -- I don't
11 know. I don't know.

12 Q. Okay.

13 If you look at -- compare Exhibit 8,
14 which is your time sheet, and then Exhibit 7,
15 which is some text messages that we have here,
16 the second page Carpenter 136 of Exhibit 7,
17 there is a text message from Ms. Carpenter to
18 you of July 28th, 2023 at 3:46 p.m.

19 You have that form you can E-mail me.
20 She's asking you about the food vendor forms.
21 And you respond at 3:46, I have to find it; and
22 I will send it to you Monday morning.

23 Do you see that?

24 A. Yes.

25 Q. She texts you again, Not on your

1 computer; and you respond, I am not in my
2 office, at 3:48 p.m. that day.

3 Do you see that?

4 A. Yes.

5 Q. Did you leave early that day?

6 A. I have no idea. A lot of times I'm
7 with Kelly too.

8 Q. I'm just trying to figure out where --
9 if for the eight-and-a-half hours that you
10 billed the Parish to work --

11 A. The half an hour could be, because I go
12 in. I may go in at 7:40.

13 Q. Okay.

14 A. So I mean it just depends on when you
15 clock in and when you clock out.

16 Q. So on July 28th, 2023, you don't know
17 what time of day you went in to start your
18 eight-and-a-half hours that day; right?

19 A. No.

20 Q. But we do know by 3:48, you're telling
21 Ms. Carpenter you're not in the office;
22 correct?

23 A. Correct.

24 A lot of times, like I said, if Kelly
25 says, We need to go here, we need to go there,

1 I'm with him.

2 Q. And her Friday night shows usually
3 start after 3:00 o'clock; isn't that true?

4 A. Her Friday night shows would start
5 later, but she would get there between 2:00 and
6 3:00.

7 Q. So we know from the prior exhibits that
8 the Parish -- the Arena operated a concession
9 stand for Run for the Pearl in August of 2023;
10 correct?

11 A. Yes.

12 Q. I'm going to show you what I'm marking
13 as Exhibit 9. This is a text message between
14 you and Ms. Carpenter.

15 Starting at the top of August 4th, 2023
16 at 1:06 p.m. she's asking, Is concession open
17 for food and drinks now; and you respond, Not
18 until 5:00, correct?

19 A. Correct.

20 Q. So even though the Parish now is
21 operating the concession stand and
22 Ms. Carpenter is not allowed to have food
23 vendors that would sell food that the Parish
24 would be selling, why didn't the concession
25 stand open earlier when Ms. Carpenter's show

1 started?

2 A. Her show -- I don't know what the 4th
3 was on, if that was a Friday or a Saturday.

4 That was a Friday.

5 So her show didn't start until later
6 that afternoon.

7 Q. What time does Run for the Pearl start
8 on Friday afternoons?

9 A. Well, Run for the Pearl starts on a
10 Saturday.

11 Q. And what time do people start showing
12 up to participate in Run for the Pearl?

13 A. I don't know. I mean, morning time.

14 Q. Morning time on Friday; right?

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

16 Q. Yes?

17 A. Morning time as -- I mean some people
18 would come in Friday afternoon and spend the
19 night and be there for Saturday for Run for the
20 Pearl.

21 Q. And some people for Run for the Pearl
22 come on Thursday night?

23 A. Some Thur- -- yes, Thursday night.
24 Yes, yes.

25 Q. So did the Parish operate the

1 concession stand for Ms. Carpenter on Thursday
2 night?

3 A. No.

4 Q. Did the Parish operate the concession
5 stand for Ms. Carpenter prior to 5:00 o'clock
6 on Friday?

7 A. No. It was Friday at 5:00 o'clock we
8 open. We probably opened a little bit earlier
9 than that.

10 And we've done that all -- I mean,
11 we've always done that.

12 Q. That's an event that sells out;
13 correct?

14 A. Sells?

15 Q. Sells out all of the stalls at the
16 Arena?

17 A. Sometimes.

18 Q. It's one of the biggest shows
19 Ms. Carpenter has --

20 A. Yes.

21 Q. -- in a given year?

22 A. Run for the Pearl, yeah.

23 Q. You weren't working the concession
24 stand on that Friday the 4th; were you?

25 A. No.

1 Q. What were you doing for 16.25 hours on
2 August 4th?

3 MR. GIRAUD:

4 You know, I understand this is a
5 discovery deposition; but this is so far beyond
6 asking this lady what she was doing at work
7 that day, far beyond the issues involved in
8 this litigation.

9 We're getting really borderline, even
10 aggressively trying to come up with why it's
11 reasonably calculated to lead to the discovery
12 of admissible evidence for what this litigation
13 is going to solve.

14 I'm not saying don't answer.

15 But you're going through this lady's
16 time sheets now. As if she was the one making
17 a claim of lost income or something.

18 MR. MAUTERER:

19 There are many allegations in the First
20 Amended Complaint that fit within this line of
21 questioning.

22 BY MR. MAUTERER:

23 Q. So what were you doing for 16 --

24 A. Well, I was -- I did work on the 4th.
25 That was Friday night.

1 Q. 16-and-a-half hours?

2 A. I worked eight -- at my regular
3 eight-hour time, and then Friday night I worked
4 the concession until it was over.

5 Q. Well, see that was easy enough.

6 Eight hours you were in the office or
7 doing office manager role; right?

8 A. Right.

9 Q. And then it's your testimony that you
10 were working the concession stand for the
11 remaining 8.25 hours; right?

12 A. Correct. Right.

13 Q. In your role as office manager, is it
14 your responsibility to provide available dates
15 to Ms. Carpenter and work on the dates she
16 wants to rent in every given year?

17 A. Yes.

18 Q. I'm going to show you what I'm marking
19 as Exhibit 10. This appears to be an E-mail
20 from you to Tanya Carpenter dated August 12th,
21 2023, providing of dates for which the Arena
22 has her down for events in 2024.

23 Is that a fair understanding of what
24 this E-mail is?

25 A. Yes.

1 Q. And it says, Please confirm so we can
2 proceed with the contracts; right?

3 A. Right.

4 Q. Contracts for Ms. Carpenter, they were
5 signed on the day of her events; isn't that
6 correct?

7 A. Yes. She would sign them when she came
8 in.

9 Q. Is it fair to say that every year
10 around August/September time is when the Arena
11 and Ms. Carpenter would start talking about
12 available dates for the following year?

13 A. I don't know when it is. When --
14 there's talk all year long, so.

15 Q. Was there a time that Mr. Wells or
16 anyone else reversed the decision regarding
17 operating concession stands at every one of
18 Ms. Carpenter's events, and from that point
19 forward the Parish was going to provide
20 concessions?

21 MR. GIRAUD:

22 Object as to form. You can answer, if
23 you can, subject to the objection.

24 THE WITNESS:

25 I'm not quite sure what you're saying

1 and asking.

2 BY MR. MAUTERER:

3 Q. So we talked about, I guess, prior to
4 COVID time, the Parish ran concessions at all
5 of Ms. Carpenter's events; but there was a time
6 that it was deemed by the Parish unprofitable,
7 so they were going to stop; right?

8 A. Right.

9 Q. And Ms. Carpenter was then responsible
10 to get her own food vendors; correct?

11 A. Right.

12 Q. We talked about that.

13 And we also talked about the Parish
14 deciding that it was going to open concessions
15 for Run for the Pearl in August of 2023; right?

16 A. Correct.

17 Q. Was there a decision that was made
18 that, Okay, now the Parish is going to start
19 providing concessions again at all of
20 Ms. Carpenter's events?

21 MR. GIRAUD:

22 Object as to form. You can answer,
23 subject to the objection.

24 THE WITNESS:

25 I'm not sure.

1 BY MR. MAUTERER:

2 Q. If you look at Exhibit 9, let's see if
3 it somewhat refreshes your recollection.

4 In the bottom part of the page,
5 9/13/23, text message at 11:38. It's
6 Ms. Carpenter responding to your text message
7 of 9:45 where you say, Do you want me to do
8 concessions Saturday night.

9 First of all, do you see that?

10 A. Yes.

11 Q. She responds, Sorry, I was in a
12 doctor's appointment. But just saw something
13 about a gate wheel. I think she was referring
14 to a way prior message.

15 Don't know nothing about that. No one
16 told me it was or wasn't broken. As far as
17 concessions is concerned, yes, we do need
18 concessions. And as per you, a few weeks ago,
19 you all are doing all concessions; and you all
20 just set up some new system to handle it.
21 Remember?

22 I have also decided at regular shows,
23 not special events, we are not doing stalls and
24 RVs. Probably no vendors either anymore. So
25 if you want stalls and RV, let me know how you

1 are going to handle them as far as who they
2 need to contact to rent one.

3 So I will no longer need the boys. I'm
4 driving now for the next hour. So if you have
5 any questions call my phone.

6 Does this refresh your recollection at
7 all or in any way as to whether or not the
8 Arena had informed Ms. Carpenter around
9 September of 2023 that it was now going to go
10 operate concessions at her events?

11 A. I don't know. I don't know.

12 Kelly asked me to ask her about
13 concessions for Saturday night. And then he
14 said -- I mean, I don't know.

15 Q. Okay.

16 So we know that there's a period of
17 time of about three years, maybe more, COVID to
18 2023, that Ms. Carpenter was having food
19 vendors of her own, because the Parish, the
20 Arena was not going to operate concessions.

21 We know that to be true; right?

22 A. Correct.

23 Q. So do you know what, if any, change
24 occurred in August/September of 2023, that
25 Mr. Wells now wanted to start operating

1 concession stands again at Ms. Carpenter's
2 show?

3 MR. GIRAUD:

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

6 THE WITNESS:

7 I don't know.

8 BY MR. MAUTERER:

9 Q. You had previously said that for many
10 years, there was -- I want to say a very good
11 relationship between the Arena and
12 Ms. Carpenter; right?

13 A. Correct.

14 Q. I think your words were "wonderful
15 relationship"?

16 A. Yes.

17 Q. And it started deteriorating.

18 Is it around August/September of 2023
19 when the relationship started deteriorating?

20 A. I don't know.

21 Q. Is there some point in time do you
22 recall the Arena starting to collect food
23 vendor fees and vendor fees directly from
24 Ms. Carpenter's food vendors?

25 A. Yes.

1 Q. And when was that?

2 A. (Witness shook head in the negative.)

3 Q. Do you know why?

4 MR. GIRAUD:

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

7 THE WITNESS:

8 Let me think.

9 Okay. Can you ask me the question
10 again, because --

11 MR. GIRAUD:

12 Are you -- you need to read it back?

13 MR. MAUTERER:

14 I think the question was literally,
15 why. But I'm trying to go --

16 MR. GIRAUD:

17 The preface --

18 MR. MAUTERER:

19 With the preface question.

20 Can you read it back? Because I think
21 I know what it was --

22 (Court reporter read requested
23 material.)

24 MR. GIRAUD:

25 Object as to form. You can answer,

1 subject to the objection, if you can.

2 THE WITNESS:

3 Okay.

4 So in the past, we used to collect
5 everything. And then, I'm not sure -- it's
6 been a few years. It was a few years ago that
7 it was decided that we were going to stop
8 collecting and let the show producers do the
9 collecting.

10 Because there was an incident that had
11 happened with one of the vendors saying that
12 they paid, and they did not pay. Said that
13 they paid one of our boys. And that was not
14 true.

15 So Kelly decided that we were going to
16 -- we were going to do the collecting again.

17 BY MR. MAUTERER:

18 Q. So the incident that you're just
19 talking about, isn't it true that at that time
20 Ms. Carpenter was still collecting all of the
21 fees?

22 A. Yes.

23 Q. And isn't it also true that
24 Ms. Carpenter paid the fee for the vendor, who
25 allegedly paid the boys?

1 A. Yes, she did. She paid. But then she
2 wanted it back, so she got it back.

3 Q. So at that time --

4 MR. GIRAUD:

5 Wait, were you finished?

6 THE WITNESS:

7 Yeah.

8 MR. GIRAUD:

9 I'm sorry.

10 BY MR. MAUTERER:

11 Q. So at least as to the time that you're
12 speaking of, that instance, we know that
13 Ms. Carpenter was collecting all of the fees at
14 that time?

15 A. At that time, yes.

16 Q. So when did the decision change, I
17 guess, not to -- to collect the fees directly
18 from the vendors and not the promoters?

19 A. I don't know when that -- I don't know.
20 I'm not sure of the time.

21 Q. Let me show you what I'm marking as
22 Exhibit 11. So this is a text message between
23 you and Ms. Carpenter, September 23rd, 2023.
24 She's asking at the top, You collected \$50 from
25 the tack girl. You respond, Yes, she paid.

1 Correct?

2 A. Yes.

3 Q. And then she says, Well, yeah, I charge
4 them \$200 remember; and you all just cut that
5 in half. And you responded, I got from her
6 what she owed, is for the weekend.

7 Correct?

8 A. Correct. Yes.

9 Q. So you collected directly from one of
10 her vendors --

11 A. Correct.

12 Q. -- what -- let me say it again.

13 A. Okay.

14 Q. You collected directly from one of the
15 vendors what was owed to the Arena; correct?

16 A. Correct.

17 Q. You didn't collect what was owed to
18 Ms. Carpenter; correct?

19 A. Correct.

20 Q. And then Ms. Carpenter responds, As
21 always, \$200 per event; and she said you told
22 her, No, it was not collecting -- or is not
23 collecting.

24 And I think you respond "is."

25 She responds, Yes, you charged \$100;

1 and you respond, Yes.

2 Do you see that?

3 A. Yes.

4 Q. And then you say, That's what she owed
5 us.

6 Correct?

7 A. Correct.

8 Q. For the Arena.

9 Ms. Carpenter seems to get upset, Well,
10 so I guess you just cut me right out; correct?
11 You know what I charge all vendors.

12 Do you see that at the bottom?

13 A. Yes.

14 Q. You respond, No, I don't know what you
15 charge all vendors. You used to collect and
16 gave us what we had to have from them.

17 Do you know why you went directly to
18 Ms. Carpenter's vendors and collected directly
19 from them?

20 A. No, I do not. I don't know.

21 Q. And while you might not have known
22 exactly what Ms. Carpenter charged her vendors,
23 you did have an understanding in September of
24 2023 that she would charge an amount to the
25 vendors above what the Arena charged; correct?

1 A. Correct. But I think this is where
2 Kelly said to collect from the vendors what
3 they owed us, and then Tanya could collect from
4 them what they owed her.

5 Q. Is it fair to say that the contract
6 between -- the contract is between the Arena
7 and Ms. Carpenter in 2023; correct?

8 A. Yes.

9 Q. Is it also fair to say that the Arena
10 does not have a contract with Ms. Carpenter's
11 vendors?

12 A. No.

13 Q. It's fair to say that; right? You
14 don't have a contract?

15 A. I don't have -- they don't sign a
16 contract. They don't sign anything.

17 Q. Do you know why in September of '23
18 that Kelly is changing the process and telling
19 you -- hold on let me finish. I know you're
20 getting excited -- telling you to go and
21 collect directly from Ms. Carpenter's vendors?

22 A. No. Do not.

23 Q. And isn't it true the only vendors that
24 you were collecting directly from were during
25 Ms. Carpenter's events?

1 A. No.

2 Q. Is it your testimony today that you
3 started -- per Mr. Wells, you started
4 collecting directly from vendors for other
5 promoters' events?

6 A. Yes.

7 Q. Do you recall that in September of 2023
8 there was also discussions regarding potential
9 new changes to the contracts between the Arena
10 and Ms. Carpenter?

11 A. I'm not sure.

12 Q. I'm going to show you what I'm marking
13 as Exhibit 12. This is a text message between
14 you and Ms. Carpenter, Bates Number Carpenter
15 151 of September 28, 2023.

16 At the bottom at 10:04 a.m.,
17 Ms. Carpenter is texting you, Let me know when
18 you get a copy of the new contract, so I can
19 see the changes, decide, and get insurance
20 prices. If I have to give any up, it would be
21 in the summer. I need to set the clinic date
22 with Talmadge. We may move him back in
23 November doing a different format. Finals will
24 definitely be back in November. If you E-mail
25 it, let me know. I don't check my E-mail

1 unless I know something is being sent.

2 Does this refresh your recollection as
3 to whether or not there was at least a
4 discussion regarding new contracts?

5 A. Yes.

6 Q. Do you know why there was a discussion
7 regarding changing the contracts in September
8 of 2023?

9 A. I do not.

10 Q. Would that have been a decision of
11 Mr. Wells?

12 A. Yes.

13 Q. Would that have been a decision of the
14 Administration, meaning Mr. Miller and
15 Mr. Thomas?

16 A. Possibly.

17 Q. Do you recall Ms. Carpenter following
18 up in the following month asking about the new
19 contracts?

20 A. Yeah, I'm sure she did.

21 Q. Let me show you what I'm marking as
22 Exhibit 13. At the bottom, it's an E-mail. It
23 looks like from you of October 11th, 2023, Toni
24 Jean Catalano wrote: Good morning, we do have
25 the information for the new contracts. Please

1 review the dates I sent you previously and send
2 me which ones you want. I will prepare the
3 contracts for these dates.

4 Do you see that?

5 A. Yes.

6 Q. And Tanya responds it looks like that
7 same day, less than 20 minutes later.

8 That's the problem. I need to see the
9 changes in any of the contracts, so I can see
10 what I can book. Seems they were redoing the
11 terms on the contract. I may or may not be
12 able to use any or may be able to use all of
13 the dates. If you can void a blank contract
14 out for me to preview the new terms, that would
15 be great. My insurance requires approval too,
16 if the contract has any changes. They have the
17 old contract. I need to price everything out,
18 so I can see what we can afford. Let me know
19 if you will be sending that. Thanks.

20 Did you provide a copy of a new
21 contract in response to this E-mail?

22 A. I'm not sure.

23 Q. Are you aware of a meeting between
24 Ms. Carpenter; Mr. Wells; and the
25 Administration, Robby Miller and Mr. Thomas;

1 about five days after this October 11th, 2023
2 E-mail discussing new contracts?

3 A. I mean, I wasn't involved in it. I
4 know that he was going to a meeting, but --

5 Q. And were you aware -- you weren't in
6 the meeting; correct?

7 A. No.

8 Q. Were you aware that during that meeting
9 Kelly accused Ms. Carpenter of losing money?

10 MR. GIRAUD:

11 Object as to form. She just said she
12 wasn't at that meeting.

13 Now, you're asking what happened during
14 the meeting.

15 BY MR. MAUTERER:

16 Q. Are you aware? And if the answer is
17 no, the answer is no.

18 A. No.

19 Q. Did Mr. Wells come back and talk to you
20 about the meeting?

21 A. No.

22 Q. So you have absolutely no personal
23 knowledge regarding what was said during that
24 meeting --

25 A. No.

1 Q. -- fair?

2 Do you know that as a result of the
3 meeting, Ms. Carpenter's multi-event producer
4 discount was eliminated?

5 MR. GIRAUD:

6 Object as to form. You can answer,
7 subject to the objection, if you can.

8 THE WITNESS:

9 No.

10 BY MR. MAUTERER:

11 Q. Do you know as a result of the meeting
12 that Ms. Carpenter had to now start paying
13 deposits?

14 MR. GIRAUD:

15 Object as to form. You can answer,
16 subject the objection, if you can.

17 THE WITNESS:

18 Yes.

19 BY MR. MAUTERER:

20 Q. Let me show you what I'm marking as
21 Exhibit 14.

22 At the bottom, this appears to be an
23 E-mail from you to Tanya Carpenter dated
24 October 25th, 2023.

25 Is that so far fair?

1 A. Yes.

2 This is from Kelly.

3 Q. Okay.

4 So even though the E-mail says from
5 Toni Jean Catalano to Tanya Carpenter, is it
6 your testimony that Mr. Wells typed this?

7 A. No, I typed it. He told me what to
8 type.

9 Q. So the contents of the E-mail is a
10 message from Mr. Wells that you typed using
11 your E-mail address; correct?

12 A. Correct.

13 Q. And it starts off with, After speaking
14 with Kelly regarding you all's meeting with him
15 and the Administration, here are answers to
16 your questions.

17 Right?

18 A. Correct.

19 Q. And I'm not going to read every single
20 line. But it talks about the Administration
21 and the Arena Management hadn't changed the
22 fees. It was just opting now to remove the
23 multi-date or multi-weekend discount.

24 Correct?

25 MR. GIRAUD:

1 Object as to form.

2 THE WITNESS:

3 Yes.

4 BY MR. MAUTERER:

5 Q. It also tells Ms. Carpenter that a
6 separate contract will be done for each
7 reserved weekend and a deposit now collected
8 for each contract; right?

9 A. Yes.

10 MR. GIRAUD:

11 Object as to form. You can answer.

12 BY MR. MAUTERER:

13 Q. It's also telling her regarding a form
14 that will be needed to be submitted to the
15 Arena for approval of items to be sold from
16 food vendors; right?

17 A. Yes.

18 Q. It's even telling Ms. Carpenter that
19 the producer should collect the fee from the
20 vendor at the beginning of the event and pass
21 it on to the Arena staff; right?

22 MR. GIRAUD:

23 Object as to form.

24 THE WITNESS:

25 Yes.

1 BY MR. MAUTERER:

2 Q. It also sets prices for stalls, RVs,
3 shavings; correct?

4 A. Yes.

5 Q. Are you aware that prior to October of
6 2023 Ms. Carpenter enjoyed a multi-event
7 producer discount?

8 A. Yes, she did.

9 Q. And are you aware that prior to October
10 of 2023, she no longer enjoyed that discount?

11 A. Yeah. From (indicating) here.

12 Q. And are you aware that prior to October
13 2023, she did not have to make a deposit for
14 her shows?

15 A. Yes.

16 Q. And that after October 2023 she did;
17 correct?

18 A. Yes.

19 Q. Are you aware that when Ms. Carpenter
20 rented the facility, the Florida Parishes
21 Arena, for Friday night, she entered into one
22 contract; correct?

23 A. Correct.

24 Q. And then Saturday she entered into
25 another contract; correct?

1 A. Correct.

2 Q. And the reason is, because NBHA was on
3 that Saturday; correct?

4 A. Correct.

5 Q. Just so we have a clear record, I'm
6 going to show you what I'm marking as
7 Exhibit 15.

8 For the record, this is a High Road
9 Productions, LLC, Finally Friday Barrel Race.
10 The date that's being reserved is February 3rd,
11 2023; correct?

12 A. Correct.

13 Q. And looking on the second page of this
14 document, it shows under section Roman Numeral
15 II(A)(4), that she's given a multi-event
16 producer discount; and it's \$225 she's got to
17 pay; correct?

18 A. Correct.

19 Q. And if you look at the last page it
20 shows, No deposit is due; correct?

21 A. Correct.

22 Q. And I'm going to show you what I'm
23 marking as Exhibit 16. This is a contract for
24 Ms. Carpenter's NBHA Barrel Race that was the
25 next day on Saturday, for February 4th, 2023.

1 Do you agree with me with that?

2 A. Yes.

3 Q. Just like Exhibit 15, she enjoyed a
4 multi-event producer discount of \$250 on this
5 one; correct?

6 A. Correct.

7 Q. And then she didn't have to pay a
8 deposit for this event; correct?

9 A. Correct.

10 Q. Does any of this, that we've now been
11 going over, refresh your recollection as to
12 whether or not this is the time period in which
13 the relationship between Mr. Wells and
14 Ms. Carpenter was deteriorating?

15 MR. GIRAUD:

16 Object as to form. You can answer,
17 subject to the objection.

18 THE WITNESS:

19 To be honest, I don't know.

20 BY MR. MAUTERER:

21 Q. I'm going to show you what I'm marking
22 as Exhibit 17.

23 On the second page of Exhibit 17, which
24 is Carpenter 0927 and 0928, that's your E-mail
25 of October 25th, 2023 that we were just

1 speaking about, and which is Exhibit 14;
2 correct?

3 The second page at the bottom and
4 compare that to Exhibit 14.

5 MR. GIRAUD:

6 It's right (indicating) here.

7 THE WITNESS:

8 Oh, okay.

9 MR. GIRAUD:

10 He's talking about starting
11 (indicating) here, where it says, Tanya, After
12 speaking with Kelly.

13 THE WITNESS:

14 Okay.

15 MR. GIRAUD:

16 Then through the rest of that E-mail.

17 BY MR. MAUTERER:

18 Q. If it helps at all, put Exhibit 14 next
19 to Exhibit 17; and see if they match.

20 A. (Witness complying.)

21 Q. It's the same one; right?

22 A. Yes.

23 Q. So the first page of Exhibit 17 and
24 most of the second page, would you agree with
25 me that's Tanya Carpenter's response to your

1 October 25th, 2023 E-mail?

2 MR. GIRAUD:

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

5 THE WITNESS:

6 Yes.

7 BY MR. MAUTERER:

8 Q. And the E-mail from Ms. Carpenter to
9 you is dated November 7, 2023; correct?

10 A. Correct.

11 Q. Ms. Carpenter addresses several things
12 in this E-mail. She's asking whether or not
13 she can get a half-day rental on Friday and
14 Saturday, because of the amount of time that
15 she uses the facility.

16 Is that something that was available to
17 her?

18 A. I don't -- I don't know. I don't think
19 so. I don't -- that would be Kelly for that
20 decision.

21 Q. One of the other things that
22 Ms. Carpenter addresses in this E-mail, it's
23 the second big paragraph she talks about, Since
24 High Road Productions is on the contract both
25 days and no one prepares the ground after

1 Friday night or reworks it, wets it, or even
2 cleans up before Saturday morning for the
3 Saturday to pick back up the event, we should
4 be a full day, six hours Friday night and seven
5 on Saturday for less than 18 hours for 350.

6 Do you see that?

7 A. Yes.

8 Q. Is it your understanding that even
9 though they are separate contracts between
10 Finally Friday/High Road Productions and
11 NBHA/High Road Productions that the grounds
12 were not reworked on Saturday mornings?

13 A. Correct.

14 They're not -- our guys do not do that.

15 Q. Even though the contract -- is it your
16 understanding of whether or not the contract
17 actually requires that?

18 MR. GIRAUD:

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

21 THE WITNESS:

22 No. I was under the impression that
23 from what's been discussed, that it's up to the
24 show producer. That we don't have anyone. Our
25 people don't work the ground like on the next

1 day. We don't have anyone.

2 Now, years ago, we did. We had a guy
3 that worked, that would come and work the
4 ground. But I don't know what happened with
5 that.

6 BY MR. MAUTERER.

7 Q. Coach doesn't work on Saturdays?

8 A. No.

9 Certain events he may work for a little
10 while, but normally he doesn't work on
11 weekends.

12 Q. And for many years the Parish would
13 provide a tractor and a tractor driver to
14 Ms. Carpenter; isn't that true?

15 A. Yes.

16 Q. And then at some point in time the
17 Parish would provide a tractor but no tractor
18 driver; correct?

19 A. Correct.

20 Q. And Ms. Carpenter is saying, I have to
21 pay my tractor driver to show up two hours
22 early to prepare everything and get help to wet
23 it, the run out and holding areas; and we need
24 to rework the warm-up pen to keep it safe.

25 Is that something that she was able to

1 negotiate and discuss with the Arena?

2 MR. GIRAUD:

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

5 THE WITNESS:

6 I mean she could have.

7 BY MR. MAUTERER:

8 Q. And, in fact, is that not what she's
9 doing in this E-mail? She's addressing that?

10 MR. GIRAUD:

11 Object as to form. You can answer,
12 subject to the objection, if you can.

13 THE WITNESS:

14 Yeah.

15 BY MR. MAUTERER:

16 Q. She's also asking regarding this new
17 deposit that she has to pay. If I secure all
18 15 weekends, will I need to pay a \$1500 deposit
19 at one time or will the \$100 deposit per
20 weekend roll over from weekend to weekend
21 throughout the end of the 2024 season?

22 A. All this would be Kelly questions. He
23 would be the one to say, Yay or Nay to this.

24 This is all above my pay grade.

25 Q. So it's fair to say anything new that

1 was occurring in October, November with the
2 contracts, deposits, not having multi-event
3 discounts, that was all Kelly Wells' decision;
4 correct?

5 MR. GIRAUD:

6 Object as to form. You can answer,
7 subject to the objection, if you can.

8 THE WITNESS:

9 Correct.

10 BY MR. MAUTERER:

11 Q. Do you know whether either you or
12 Mr. Wells responded to all of the content or
13 issues that Ms. Carpenter was raising in the
14 November 7th E-mail?

15 MR. GIRAUD:

16 Object as to form. You can answer,
17 subject to the objection, if you can.

18 THE WITNESS:

19 I don't know.

20 BY MR. MAUTERER:

21 Q. The process of continuing forward with
22 selection of dates did continue forward;
23 correct?

24 A. Correct.

25 Q. All right.

1 I'm going to show you what I'm marking
2 as Exhibit 18. It looks like somewhat at the
3 top, on Friday, November 15th, 2023, Toni Jean
4 Catalano wrote: Tanya, Kelly asked me to send
5 this to you. Please verify with an
6 affirmative. Show dates are as follows. And a
7 whole bunch of dates.

8 Do you recall being asked to send this
9 to Ms. Carpenter from Mr. Wells?

10 A. Yes.

11 Q. Is it fair to say that the contracts,
12 the four corners of the documents, didn't
13 change; correct?

14 A. Not that I know of.

15 Q. It's just -- I'm going to show you what
16 I'm marking as Exhibit 19. This is a High Road
17 Productions/Finally Friday contract for August
18 2nd and 9th, September 20th, November 15th and
19 22nd, 2024.

20 Contract is still the same as, in
21 appearance, as the ones in previous years;
22 correct?

23 A. Right.

24 Q. But if you look at the second page, at
25 least, in 2024 now, Ms. Carpenter was not

1 provided the multi-event producer discount;
2 correct?

3 A. Correct.

4 Q. And there was, for the first time now,
5 calculations of deposits, which there appears
6 to be some handwriting on the side to determine
7 what the amount of the deposit was; correct?

8 A. Correct.

9 Q. And then the last page shows a deposit
10 amount being due on signing; correct?

11 A. Correct.

12 Q. Similarly, when she rented the Arena
13 for the 2024 dates here, I'll show you what I'm
14 marking for Exhibit 20 for NBHA, for August
15 10th, September 21st, November 16th, 2024, even
16 Ms. Carpenter renting it for the NBHA Barrel
17 Racing, she was also -- the multi-event
18 producer discount was removed; correct?

19 A. Correct.

20 Q. And she was now also charged a deposit;
21 correct?

22 A. Correct.

23 Q. Was everyone charged a deposit after
24 October 25th, 2023?

25 MR. GIRAUD:

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

3 THE WITNESS:

4 Yes. As far as I know.

5 BY MR. MAUTERER:

6 Q. Do you know who Willie Matthews is?

7 A. Yes.

8 Q. Who is he?

9 A. He is the show producer of a car show.

10 Q. Was Mr. Matthews also an employee of
11 the Parish at some point?

12 A. I have no clue.

13 Q. I'm going to show you what I'm marking
14 as Exhibit 21. This is a contract for
15 Alligators on Da Bayou Volume 3 Car Show to
16 Willie Matthews for -- it says the date
17 reserved September 17th, 2024.

18 But look at the second page?

19 A. (Witness complying.)

20 Q. The car show is not a livestock event.

21 Would you agree with that?

22 A. Correct.

23 Q. But that fact notwithstanding,
24 Mr. Matthews was provided a \$250 multi-event
25 producer discount under the Livestock Event

1 category on this contract; correct?

2 A. Correct. Per Kelly Wells.

3 Q. And did Mr. Matthews produce five or
4 more events in a calendar year to your
5 knowledge?

6 A. No.

7 Q. Other than this car show event, are you
8 aware of any time prior to September of 2024
9 that Mr. Matthews rented the Florida Parishes
10 Arena?

11 A. No.

12 Q. If you look at the last page of
13 Mr. Matthews' contract?

14 A. (Witness complying.)

15 Q. He wasn't charged a deposit either;
16 correct?

17 A. No.

18 Q. And if you look at the -- right above
19 the signatures, under Section XII, Insurance
20 Requirements: Insurance is required for all
21 events having more than 100 participants or any
22 spectators in the amount of \$1,000,000.

23 Do you see that?

24 A. Yes.

25 Q. Was Mr. Matthews required to carry

1 \$1,000,000 for his car show?

2 MR. GIRAUD:

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

5 THE WITNESS:

6 I'm not sure.

7 BY MR. MAUTERER:

8 Q. I'm going to show you what I'm marking
9 as Exhibit 22.

10 This is a Certificate of Insurance for
11 Willie Matthews for the car show event that was
12 on September 21st, 2024 with limits of
13 half-a-million dollars.

14 Do you see that?

15 A. Yes.

16 Q. Do you know why Mr. Matthews was
17 allowed to only carry a half-a-million dollars
18 worth of insurance, even though the contract
19 says, for events having more than 100
20 participants or any spectators it requires a
21 \$1,000,000?

22 MR. GIRAUD:

23 Object as to form. You can answer,
24 subject to the objection, if you can.

25 THE WITNESS:

1 I do not.

2 BY MR. MAUTERER:

3 Q. Was this a decision by Mr. Wells?

4 MR. GIRAUD:

5 Object as to form. You can answer,
6 subject to the objections, if you can.

7 THE WITNESS:

8 Yes.

9 And I don't know if it was because it
10 was the parking lot and it wasn't the Arena, if
11 that had something to do with it. I don't
12 know.

13 BY MR. MAUTERER:

14 Q. Are you aware of instances where if
15 people rented the parking lot, they would not
16 have to -- are you aware of instances where
17 people renting the parking lot would not have
18 to carry the \$1,000,000 policy?

19 MR. GIRAUD:

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

22 THE WITNESS:

23 No. I mean, we very seldom rented the
24 parking lot.

25 BY MR. MAUTERER:

1 Q. I'm going to show you what I'm marking
2 as Exhibit 23. This is a contract dated March
3 22nd, 2025 with 3-Dots Team Sorting.

4 If you look at the back page, were they
5 required to pay a deposit?

6 A. No.

7 I don't know if they paid -- if they
8 paid the amount in full. I'm not sure.

9 Because some did.

10 MR. GIRAUD:

11 The amount in full for the entire
12 rental. I just want to understand what you're
13 talking about?

14 THE WITNESS:

15 (Witness nodded head in the
16 affirmative.)

17 Yes.

18 BY MR. MAUTERER:

19 Q. Above that, on Section XII, it has an
20 insurance requirement of \$1,000,000 for people
21 having participants of -- 100 participants or
22 any spectators.

23 Do you know whether or not 3-Dots Team
24 Sorting carried \$1,000,000 worth of insurance?

25 A. I'm not sure. I know they had

1 insurance, but I'm not sure.

2 If they didn't have -- I know the
3 number of spectators, they didn't have 100
4 people. And they didn't have 100 people --
5 participants.

6 Q. So the contract says, 100 participants
7 or any spectators.

8 So if they had one spectator, would it
9 be -- is it your understanding whether or not
10 \$1,000,000 worth of coverage was required?

11 MR. GIRAUD:

12 Object as to form. You can answer,
13 subject to the objection, if you can.

14 THE WITNESS:

15 I don't know. This is -- I don't know.

16 BY MR. MAUTERER:

17 Q. I'm going to show you what I'm marking
18 as Exhibit 24. This is 3 Dots LLC's
19 Certificate of Insurance for half-a-million
20 dollars.

21 Do you know why --

22 MR. GIRAUD:

23 That's just a general liability --

24 THE WITNESS:

25 The general.

1 BY MR. MAUTERER:

2 Q. Each occurrence is half a million;
3 right?

4 A. Yes.

5 I don't know what the general is. It's
6 a million.

7 Q. I'm going to show you what I'm marking
8 as Exhibit 25. This is a contract with Crazy
9 Train Productions Barrel Race/Turn'n Up
10 Thursday's, Estee Hawkins, one of
11 Ms. Carpenter's competitors; correct?

12 A. Correct.

13 Q. This is a contract from April 6, 2023;
14 right?

15 A. Yes.

16 Q. And it shows, at least, in April of
17 2023 Ms. Hawkins was also receiving the
18 multi-event producer discount; correct?

19 A. Correct.

20 Q. And prior to, or excuse me, in April of
21 2023, Ms. Hawkins was not paying a deposit;
22 correct?

23 A. I don't know if she paid the -- the
24 balance -- I mean, paid out in full.

25 Q. According to the contract, though,

1 there was no deposit due at signing; correct?

2 A. Correct.

3 Q. Now, let's look at Ms. Hawkins'
4 contract in 2024. I'll show you what I'm
5 marking as Exhibit 26.

6 This is Ms. Hawkins contract August
7 8th, 2024. She, again, is not paying a
8 deposit; correct?

9 A. Like I said, I don't know if it was
10 paid in full.

11 Q. There was no deposit due at signing,
12 though; correct?

13 A. Correct.

14 Q. Let me show you what I'm marking as
15 Exhibit 27. This is a Crossbrand Youth Rodeo
16 Event of August 16th, 2025.

17 Crossbrand Rodeo is being provided a
18 multi-event producer discount; correct?

19 A. Correct. Per Kelly Wells.

20 Q. And Crossbrand Youth Rodeo also did not
21 deposit anything at signing; correct?

22 A. Not on the contract.

23 Q. Now, we talked about Mr. Matthews
24 renting the parking lot for a car show on
25 September 21st, 2024.

1 You remember, at least, talking about
2 that?

3 A. Yes.

4 Q. Okay.

5 And on the day of the car show, there
6 was two events at the Arena property; correct?

7 A. Correct.

8 Q. Ms. Carpenter's barrel racing event
9 that had the Arena itself; correct?

10 A. Correct.

11 Q. And then Mr. Matthews was supposed to
12 have the parking lot; right?

13 A. Correct.

14 Q. It's fair to say Mr. Matthews' event
15 drew a significant crowd?

16 A. Correct.

17 Q. And you worked that day; correct?

18 A. Correct.

19 Q. Were you aware of the cars and the car
20 show and the participants from the car show
21 making their way back toward the Arena, where
22 the horses and the participants and --

23 A. No.

24 Q. You were not aware of that?

25 A. No.

1 Q. Where were you working on the day of
2 the car show, in your office?

3 A. I was in there, and then I -- we would
4 go outside.

5 Q. Who is "we"?

6 A. Me and Beverly Carter. She was a
7 part-time person. And Donna Domiano. And then
8 the boys.

9 Q. Are you aware that Ms. Carpenter was
10 complaining about the cars from the car show
11 coming back to where her participants were?

12 A. Yes.

13 Q. And how did she complain about the cars
14 going back where the horses were?

15 A. I -- I was just hearing what other
16 people were saying, that they were going to the
17 back.

18 Q. Did she complain to you?

19 A. I don't -- I don't remember.

20 Q. Do you remember whether or not
21 Ms. Carpenter came to the office to have a
22 discussion with you about the car show
23 participants?

24 A. She came up -- I was standing outside,
25 and I saw her walking up. And she said, Hey,

1 where is Kelly. I said, Kelly is not here.

2 And she said, Well, Lane told me he's
3 here. To come talk to him. And I said, Well,
4 he was here; but he's no longer here.

5 And she insisted he was there. So I
6 invited her into the office and to see --

7 MR. GIRAUD:

8 Wait, stop.

9 MS. CARPENTER:

10 I have to take a walk.

11 MR. MAUTERER:

12 Go ahead.

13 MR. GIRAUD:

14 You've got every right to be here, but
15 you can't comment during the --

16 MS. CARPENTER:

17 No, I'm just going to go get --

18 BY MR. MAUTERER:

19 Q. Go ahead.

20 MS. CARPENTER:

21 Excuse me. My husband is texting me
22 and --

23 THE WITNESS:

24 Um --

25 BY MR. MAUTERER:

1 Q. No, stop.

2 MR. GIRAUD:

3 Give her a second to --

4 MS. CARPENTER:

5 Go ahead. I'll be right back.

6 BY MR. MAUTERER:

7 Q. Okay.

8 A. So I invited her in -- I was there.

9 Donna was there. And she stood in the doorway.

10 Q. Donna or Ms. Carpenter?

11 A. No, Donna. Donna was sitting in
12 another chair.

13 I invited Ms. Carpenter in to check and
14 see if Kelly was there, to satisfy her that.

15 Q. Was she the -- was Ms. Carpenter the
16 one standing in the doorway?

17 A. Yes. Yes.

18 Q. Okay.

19 A. She was standing stopped at the
20 doorway.

21 Q. Okay.

22 A. I was at my desk. Donna was sitting at
23 Coach's desk. She was on her cell phone with
24 her son at the time.

25 MR. GIRAUD:

1 Donna was?

2 THE WITNESS:

3 Yes.

4 MR. GIRAUD:

5 Just keeping the players straight.

6 THE WITNESS:

7 Yes.

8 BY MR. MAUTERER:

9 Q. Okay.

10 What happened?

11 A. Then Tanya went off.

12 Q. Okay.

13 A. Cursing me. Just cursing the Arena.
14 Cursing Kelly and everything. And she just
15 kept on and on.

16 And I said, Tanya, there's nothing we
17 can do about it right now. We're going to make
18 sure everything is good.

19 I said -- and then she just kept on and
20 on. I said, Oh, and by the way, I heard you
21 called me a bitch. And she said, Yes, I did.

22 And this was out in front of people,
23 that she called me a bitch over ice, because I
24 was charging her for ice.

25 Q. So you --

1 A. That's the first thing.

2 Q. Okay.

3 Continue.

4 A. Okay.

5 So she was arguing with me about me
6 charging her for ice. I don't make these
7 rules. I'm told what to do, and I follow what
8 I'm told to do.

9 So she kept on and on.

10 Well, it just got so bad that Donna
11 hung up the phone with her son. She said, Let
12 me go. I'll call you later.

13 And she got up from the chair and she
14 went to Tanya and she said, You need to go.
15 You need to get out. You need to go run your
16 horse show. Your barrel race, I'm sorry, your
17 barrel race. And then you all need to leave.

18 Q. Anything else?

19 A. That's it.

20 I was -- I did not -- I got up. And
21 when I said, I (indicating) slammed my hands
22 down on my desk; and I said, I heard you called
23 me a bitch.

24 And that was it from me.

25 But Donna got up and she said things

1 were just getting out of hand with her. And
2 she told her she needed to leave.

3 Q. So is it your testimony today that you
4 did not come toward Ms. Carpenter with your
5 finger in her face and say, Get the hell out of
6 my fucking office?

7 A. Absolutely not.

8 Q. And as a result of this alleged
9 incident, as you're describing it, did you feel
10 threatened or --

11 A. No. I mean, I was used to Tanya. She
12 did that all the time.

13 Q. This alleged incident when
14 Ms. Carpenter came to the office, what time of
15 day was that?

16 A. It was during -- I mean, it was middle
17 day maybe.

18 Q. Okay.

19 And this alleged called you a bitch
20 over ice, you didn't hear that; did you?

21 A. No. The boys.

22 Q. Which boys?

23 A. The boys that were working.

24 Q. Which --

25 A. I'm not sure which ones they were.

1 Q. Which curse words did Ms. Tanya
2 allegedly use?

3 A. When?

4 Q. When you say she cursed at you, what --
5 what --

6 MR. GIRAUD:

7 You're talking about in the office?

8 MR. MAUTERER:

9 In the office.

10 MR. GIRAUD:

11 Okay.

12 Just clarifying the --

13 THE WITNESS:

14 Just cursing. Bitch and MF and --

15 BY MR. MAUTERER:

16 Q. What else, if anything?

17 A. That might be it. It was just the same
18 thing over and over again.

19 Q. And on the day of that alleged
20 incident, did you write down anything that
21 memorialized what Ms. Carpenter allegedly said
22 to you?

23 A. No.

24 Q. Did Donna write down anything?

25 A. No.

1 Q. In the office at the time, it was only
2 you and Donna; correct?

3 A. Correct.

4 Q. And Donna is your -- your --

5 A. The door was open, because that's the
6 way in and out. So people were passing by,
7 coming in.

8 Q. Was there anyone in the office, other
9 than you and Donna?

10 A. No. It was me and Donna and Tanya.

11 Q. And Donna is your friend for many, many
12 years; isn't that true?

13 A. Yes.

14 Q. You would consider Donna one of your
15 best friends; isn't that true?

16 A. Yes.

17 Q. After that incident, did you have --
18 that alleged incident, did you have any other
19 interactions with Ms. Carpenter that day?

20 A. I don't think so.

21 Interaction with her people.

22 Q. Did you have any discussions in person
23 with her that day after this incident, alleged
24 incident?

25 A. I don't think so.

1 Q. Did the police come out that day?

2 A. Yeah. There was police there.

3 Q. Did you notify the police that this
4 alleged incident took place?

5 A. No.

6 Between me and her? I mean, like in
7 the office? No.

8 Q. Do you recall driving up in, I guess,
9 what do you call it, a Side-by-Side --

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

11 Q. -- vehicle; and Ms. Tanya Carpenter was
12 talking to the police?

13 Do you remember that?

14 A. I think so, yes.

15 Q. And that was following -- it was after?

16 A. After, yes.

17 Q. And do you recall Ms. Carpenter having
18 concerns regarding the car show participants
19 smoking marijuana at the car show?

20 A. Yes.

21 Q. Do you recall laughing at
22 Ms. Carpenter's concerns?

23 A. No.

24 Q. I'm going to show you -- were you aware
25 that the police officer that Ms. Carpenter was

1 talking to was wearing a body camera video?

2 A. I know they wear them.

3 Q. And just for the record, I'm going to
4 turn this around, so you all can see it.

5 But for the record, I'm going to start
6 the -- we're going to mark this as Exhibit 28.

7 MR. MAUTERER:

8 I'm going to turn it a little bit more,
9 but I also need to be able to hit --

10 MR. GIRAUD:

11 No, that's okay. I can see the
12 brightness. I just couldn't at that angle.

13 BY MR. MAUTERER:

14 Q. And for the record, I'm just going to
15 start the audio at 4:54.

16 (Video playing.)

17 Is that you coming up on the
18 Side-by-Side?

19 A. Yes.

20 Q. So around 5 minutes and 10 seconds, you
21 drive up.

22 There's somebody else with you; do you
23 know who that is?

24 A. I can't see.

25 Q. And it will get better when I hit play

1 again.

2 MR. GIRAUD:

3 Yeah, I can't see anything.

4 THE WITNESS:

5 I think -- that's Donna.

6 BY MR. MAUTERER:

7 Q. So the person that said, How much more
8 you got, is Donna?

9 A. Yes.

10 Q. And you're driving?

11 A. Yes.

12 Q. When you drove up, Ms. Carpenter asked,
13 you know, what you all need, right; or
14 something to that effect?

15 A. I don't remember.

16 (Video playing.)

17 Q. So Ms. Carpenter in the video at 5
18 minutes and 28 seconds is explaining to you and
19 Ms. Donna that the car show participants are
20 coming back by her event; correct?

21 A. I guess. I don't know.

22 Q. Does the video of yourself and
23 Ms. Carpenter refresh your recollection in any
24 way that she was telling you --

25 A. She may have been.

1 Q. Okay.

2 (Video playing.)

3 Why are you laughing at her concern
4 regarding --

5 A. I'm not laughing at her.

6 Q. -- skunk weed?

7 (Video playing.)

8 A. She was saying they were smoking, but
9 there's nothing that nobody could do about it.
10 The police weren't even doing anything about
11 it.

12 Q. Okay.

13 But is that a concern?

14 I mean, one of your renters was giving
15 you a concern, right, that there was a lot of
16 marijuana smoking at the Arena; correct?

17 A. But the police were there.

18 Q. The police were there, because
19 Ms. Carpenter called them; isn't that true?

20 A. I don't -- I don't know who called
21 them.

22 Q. So you sit there for a few minutes or a
23 few seconds.

24 (Video playing.)

25 So for the record, around 6 minutes and

1 37 seconds in the video you start the
2 Side-by-Side and drive off; right?

3 A. Yes.

4 Q. So at any point during that
5 interaction, the police are there. Did you
6 complain to the police that Ms. Carpenter had
7 allegedly cursed you out?

8 A. No.

9 MR. GIRAUD:

10 I'm sorry -- finish your -- this line
11 of questioning. I just need, like, 5 minutes
12 to address something having to do with the
13 firm.

14 BY MR. MAUTERER:

15 Q. And you didn't feel threatened in any
16 way when Ms. Carpenter was allegedly cursing
17 you out; correct?

18 A. No.

19 MR. GIRAUD:

20 Object as to form.

21 BY MR. MAUTERER:

22 Q. What?

23 A. No.

24 Q. If you would have felt threatened, you
25 would have had an opportunity right there to

1 talk to the police about that; correct?

2 A. Correct.

3 Q. And you didn't do that, though; right?

4 A. No.

5 MR. GIRAUD:

6 Is it okay --

7 MR. MAUTERER:

8 Take five.

9 Off the record at 1:00 o'clock.

10 (Off the Record)

11 MR. MAUTERER:

12 Back on the record at 1:11.

13 BY MR. MAUTERER:

14 Q. All right.

15 Before we took our break, you were --
16 we were talking about the alleged interaction
17 between you and Ms. Carpenter on the car show;
18 and we also saw the video.

19 A. Yes.

20 Q. Remember?

21 A. Yes.

22 Q. I think it was your testimony that you
23 invited Ms. Carpenter into the office?

24 A. Correct.

25 Q. And she stood in the doorway; right?

1 A. Yes.

2 Q. You said that you were behind or at
3 your desk.

4 How far is that from the doorway?

5 I mean, I've never been there.

6 A. I don't know. It's a good ways from
7 the door to my desk.

8 Q. So 10 feet, 20 feet?

9 I've never been to your office.

10 A. I don't know. I mean, I just -- like
11 my desk is (indicating) here; and the doorway
12 is over (indicating) there. I have no clue.

13 Q. The alleged cursing incident that
14 Ms. Carpenter, when she allegedly cursed you,
15 she didn't move from the doorway; did she?

16 A. No.

17 Q. You said you had heard that she had
18 called you a bitch over ice.

19 Tell me about that.

20 A. So the boys -- and I don't remember who
21 was working. But they went out and they came
22 back and said, Ms. Tanya needs ice. I said,
23 Well, tell her that we're charging for ice now.
24 It's \$3 a bag. And they said, Okay. And I
25 said, Wait a minute, let me make a phone call

1 just to make sure.

2 So I called Lane and I said, Hey, Tanya
3 needs ice. Are we charging? He said, Yes,
4 absolutely, \$3. I said, Okay. Just making
5 sure.

6 Hung up. I told the boys, Yes, \$3 a
7 bag. So they went back and told her that we
8 were charging.

9 Q. Okay.

10 A. And that's when the bitch came in.

11 Q. Is it your testimony that it was at
12 this car show event that the incident regarding
13 ice --

14 A. It was earlier that -- yeah, earlier
15 that day.

16 Q. Are you sure?

17 A. Maybe not. I don't know. But I know
18 it was -- it could be. I'm not sure.

19 I'm pretty sure, though, because
20 that's -- that's when I said that.

21 That's when I -- yeah, I'm pretty sure.

22 Q. So it's your testimony under oath that
23 this event, this incident with the ice occurred
24 in September of 2024; and not on
25 Ms. Carpenter's last event on November 15th,

1 2024?

2 A. I don't think so. But I'm not sure.

3 But I don't -- I don't know.

4 Q. Did you report to Mr. Wells or anyone
5 else immediately after the car show that you
6 and Ms. Carpenter had this alleged interaction
7 in your office?

8 A. Probably told Kelly, me and Donna.

9 Q. Do you have any specific recollection
10 of telling Kelly that this alleged interaction
11 between you and Ms. Carpenter occurred?

12 A. I'm pretty sure we did tell him.

13 Q. And where did you -- I mean, was it on
14 the phone? Did you see him in person?

15 A. It was probably on the phone.

16 Q. Was it --

17 A. On speaker phone, me and her.

18 Q. Was it that day?

19 A. I don't remember.

20 Q. Was it days after?

21 A. I don't remember.

22 Q. Did you get called in to HR or some
23 other place to have an interview regarding this
24 alleged interaction between you and one of the
25 Arena's customers?

1 A. No.

2 Q. In connection with any type of -- there
3 was no investigation by the -- Mr. Wells or the
4 Administration regarding this incident to your
5 knowledge?

6 MR. GIRAUD:

7 Object as to form. You can answer,
8 subject to my objection.

9 THE WITNESS:

10 No.

11 BY MR. MAUTERER:

12 Q. Do you know whether or not Mr. Wells or
13 anyone in the Administration reached out to
14 Ms. Carpenter regarding this alleged incident?

15 MR. GIRAUD:

16 Object as to form. You can answer,
17 subject to my objection.

18 THE WITNESS:

19 I don't know.

20 BY MR. MAUTERER:

21 Q. Did you report this incident to
22 Mr. Miller?

23 A. No.

24 Q. Did you report this incident to
25 Mr. Thomas?

1 A. No.

2 Q. I think I asked you whether or not you
3 wrote anything down regarding this alleged
4 incident.

5 But did anyone take any taped
6 recordings of you, a statement as to what you
7 allege occurred?

8 A. No.

9 Q. Following this alleged incident in the
10 office, we know you didn't leave for the day;
11 correct?

12 Because we saw you on video; right?

13 A. Correct.

14 Q. And --

15 A. When the incident happened with one of
16 her people, I was on the Side-by-Side; and they
17 had stopped me. And I stopped, and they
18 started yelling and screaming and cursing at
19 me. And just so happened the car show producer
20 was standing there, and he turned around. He
21 said, Don't you ever talk to her like that.
22 This is not her fault.

23 And so I drove off. And when -- I just
24 broke down. And then Donna said, What's the
25 matter. And I told her what had happened. And

1 she said, Look, park that thing. Go in the
2 office, lock the door, and don't come back out
3 right now.

4 Q. Okay.

5 So there was an incident with some
6 participants of the barrel racing event?

7 A. Yes.

8 Q. Okay.

9 Do you know who they were?

10 A. I don't know. It was a man. There was
11 a couple of women behind him. I don't know who
12 they were. But they were just letting me have
13 it.

14 Q. They were --

15 A. Cursing.

16 Q. Was it your impression they were upset
17 or at least expressing to you that they were
18 upset, because the car show was interfering
19 with the barrel racing?

20 MR. GIRAUD:

21 Object as to form. You can answer,
22 subject to my objection.

23 THE WITNESS:

24 Yes.

25 BY MR. MAUTERER:

1 Q. This incident where there was cursing
2 by a participant of the barrel racing that
3 upset you enough that you cried, that didn't
4 involve Ms. Carpenter; did it?

5 A. No.

6 Q. Did you work the entire night of the
7 21st for the -- were you there at the Arena the
8 entire night?

9 A. Yes.

10 Q. So you know what the car show turned
11 into after dark; right?

12 A. Yes.

13 Q. Did you go out of your office and
14 actually observe what was going on?

15 A. I did.

16 Q. Okay.

17 And what did you observe?

18 A. It was a lot of commotion. A lot of
19 people trying to get out -- there was three
20 things happening on the property that night.
21 There was the barrel race, the car show, and a
22 quinceañera next door.

23 Q. And did you observe participants of the
24 car show selling alcohol on site?

25 A. No.

1 Q. You don't know whether or not it did or
2 didn't happen. You just didn't see it; right?

3 A. Correct.

4 Q. Other than Ms. Carpenter telling you
5 when you drove up that participants of the car
6 show were smoking marijuana, did you learn
7 subsequently that participants of the car show
8 were selling marijuana on the grounds?

9 A. No.

10 Q. Once it got after dark, did you walk
11 the grounds of the car show?

12 A. I did.

13 Q. Were you by yourself?

14 A. No.

15 Q. Were you with Donna?

16 A. Yes.

17 Q. The people that were having the
18 quinceañera also complained to the Arena about
19 the car show that day as well?

20 A. I don't --

21 Q. Did you know?

22 You don't know?

23 A. I don't know.

24 Q. Did you speak to anyone involved in the
25 quinceañera that day?

1 A. No.

2 Q. Are you aware that Ms. Carpenter
3 attempted to keep the participants of the car
4 show away from the barrel racing by closing the
5 gate to the Arena?

6 A. No.

7 MR. GIRAUD:

8 Object as to form. You can answer,
9 subject to the objection, if you can.

10 BY MR. MAUTERER:

11 Q. You're not aware that she closed the
12 gate?

13 A. No.

14 MR. GIRAUD:

15 Same objection as to form.

16 BY MR. MAUTERER:

17 Q. Did you open a gate at any time during
18 that day?

19 A. Absolutely not.

20 Q. It's your testimony under oath --

21 A. Yes.

22 Q. Let me finish the question.

23 A. I'm sorry.

24 Q. It's probably still no, but let me
25 finish the question.

1 It's your testimony under oath that on
2 September 21st, 2024, you never opened the
3 closed gate at the car -- between the car show
4 and the Arena?

5 A. Absolutely not.

6 Q. Are you aware of anyone opening the
7 closed gate --

8 A. No.

9 Q. -- that day?

10 Were you aware or did you observe the
11 gate being closed at any time during it?

12 A. I did not.

13 Q. Did the police tell you that it was a
14 good idea to close the gate to keep the
15 participants from the car show and the barrel
16 race separate?

17 A. I don't recall that.

18 Q. Now, a month after the car show,
19 Ms. Carpenter was sent a letter from Brad
20 Cascio on behalf of the Parish barring her from
21 the Florida Parishes Arena.

22 Were you aware of that?

23 A. I knew about it, because they -- that's
24 what -- they made Kelly tell me that was
25 happening. But that's all I know. I never saw

1 the letter.

2 Q. What did Kelly tell you about what was
3 happening?

4 A. Just that Robby and Joe made the
5 decision to.

6 Q. To do what?

7 A. To not let her come back on the
8 property. To not let her, you know,
9 participate -- I mean, rent the facility.

10 Q. Is it your understanding that
11 Ms. Carpenter was only being -- what was your
12 understanding from Mr. Wells' conversation with
13 you regarding that?

14 Only that she wasn't allowed to rent
15 the facility?

16 A. That's it.

17 Q. Did Mr. Wells share with you why Robby
18 and Joe made the decision to send this letter
19 to Ms. Carpenter?

20 MR. GIRAUD:

21 Object as to form. You can answer,
22 subject to the objection --

23 THE WITNESS:

24 Not at the time.

25 MR. GIRAUD:

1 -- if you can.

2 You've got to let me finish speaking,
3 as well, just like Counsel.

4 THE WITNESS:

5 Sorry.

6 BY MR. MAUTERER:

7 Q. So at the time the letter was being
8 prepared and being sent out, Mr. Wells did not
9 tell you the reason for it; correct?

10 A. Correct.

11 Q. Okay.

12 Now, after it was sent out, did he tell
13 you what the reason was?

14 A. I don't recall.

15 Q. You kind of said, Not at the time.

16 So --

17 A. Not at the -- yeah, I don't -- I don't
18 think so. I don't remember.

19 I just know that I knew he told me that
20 they were sending out a letter.

21 Q. Okay.

22 Do you have any reason to believe that
23 the reason why Ms. Carpenter received the
24 letter or was sent the letter had anything to
25 do with you?

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MR. GIRAUD:

Object as to form. You can answer subject to the objection.

THE WITNESS:

I really don't know.

BY MR. MAUTERER:

Q. Did you request or did you make a request of Mr. Wells to have Ms. Carpenter banned from being able to rent the Florida Parishes Arena?

A. Absolutely not. It wouldn't even matter what I think.

Q. Similar question, probably the answer is the same; but I'm just going to ask it for the record.

Did you ask Mr. Wells to have Ms. Carpenter banned from the Florida Parishes Arena property for any reason?

A. Absolutely not.

Q. Same question, I'm just going to change it to the different people.

Did you make a request of Robby Miller to have Ms. Carpenter banned from the Florida Parishes Arena?

A. Absolutely not.

1 Q. Did you request Joe Thomas to ban
2 Ms. Carpenter from the Florida Parishes Arena?

3 A. Absolutely not.

4 All of that is way above my pay grade.

5 Q. Do you even know when the letter was
6 sent to Ms. Carpenter?

7 A. I do not.

8 Q. I'm going to show you an E-mail. The
9 top part of it is from Tanya Carpenter to you
10 and Lane Taillon of November 19th, 2024; and it
11 seems to be responding to an E-mail from you to
12 Ms. Carpenter of that same or earlier date,
13 November 18th, 2024. (Catalano No. 29)

14 Do you see that?

15 A. Yes.

16 Q. So starting at the bottom on November
17 18th, 2024 at 9:02 a.m. you're E-mailing Tanya.

18 Good morning, Tanya. You did not pay
19 your vendor fees. I know you had three vendors
20 and list some vendor fees; correct?

21 A. Yes.

22 Q. And she responds to you the next day,
23 almost 24 hours later, and among several things
24 she says, I'm canceling this weekend and
25 getting a refund as per your attorney's letter.

1 So I will deduct the \$140 in deposits and send
2 you a check. It will probably be a temp check,
3 because I have changed banks; and I don't have
4 the new checks yet.

5 Do you recall receiving this E-mail?

6 A. Yes.

7 Q. Okay.

8 Do you know or did you know at the time
9 you received it on November 19th, 2024 what
10 attorney's letter she was speaking about?

11 A. I did not.

12 Q. Did you do anything to talk to
13 Mr. Wells or Mr. Taillon, who was copied on
14 this letter, Mr. Taillon was, to ask him or ask
15 either one of them what attorney's letter Tanya
16 might be referring to?

17 A. No.

18 Q. Did you know on November 19th, 2024,
19 that Ms. Carpenter at that time had received a
20 letter banning her from the Florida Parishes
21 Arena after certain dates in 2024?

22 A. I did not.

23 Q. Now, when we started the deposition,
24 you kind of told me that at some point in time
25 the relationship between the Arena and

1 Ms. Carpenter deteriorated. You really didn't
2 know the reason.

3 Do you remember telling me that?

4 A. (Witness nodded head in the
5 affirmative.)

6 Q. Yes?

7 A. Yes.

8 Q. Is it fair to say that the
9 relationship, if any, between you and
10 Ms. Carpenter didn't deteriorate over this
11 time; correct?

12 MR. GIRAUD:

13 Object as to form.

14 THE WITNESS:

15 That our relationship?

16 BY MR. MAUTERER:

17 Q. Yeah.

18 MR. GIRAUD:

19 Okay. Misunderstood the question.

20 THE WITNESS:

21 I feel that I have tried to do
22 everything right for Tanya. But it got to be
23 where she was never happy with anything. It
24 was like you could never please her.

25 There was always something wrong with

1 everything there, at the Arena. From the boys
2 -- and I'm not saying they're perfect, and I'm
3 not saying they did the right things. But it
4 was always something from the boys, to me, to
5 Kelly, the grounds, Coach, the whole facility
6 as a whole.

7 And before -- from what I remember
8 before, it was never like that. Tanya used to
9 come in the concession stand, call me on the
10 phone and say, Hey, what's your special
11 tonight. Hey, send one of the boys. Bring me
12 some food, bring me a drink, send me a drink.
13 Come in, get her own drink, come and get french
14 fries.

15 Almost like part of us. I mean, like
16 part of the Arena.

17 But as the years went on, I don't know
18 what happened. And I know things are not going
19 to be perfect, because of the facility and the
20 type of facility it is.

21 But -- and she always came across as
22 being so mean. Where I know you have bad days,
23 and I know things don't always go 100 percent
24 your way or the right way. But there was
25 getting along, there was everything was fine.

1 Her and Kelly would stay on the phone.
2 They would try to cook up things to make more
3 money for both of them, the Arena and for her,
4 her barrel racing. Go out and get sponsors.

5 But I don't know what happened. It's
6 just -- it was just not the same.

7 BY MR. MAUTERER:

8 Q. Okay.

9 And I appropriate that. So I just want
10 to make sure, you observed a change; correct?

11 A. Correct.

12 Q. But you have absolutely no idea why
13 there was a change?

14 A. No.

15 Q. And as far as your personal
16 observations, Ms. Carpenter was just
17 complaining about things; correct?

18 A. Correct.

19 Q. Whether right or wrong, would you agree
20 with me that someone that is paying the Arena
21 to rent their facility, would, at least, have a
22 right to complain?

23 MR. GIRAUD:

24 Object as to form. You can answer,
25 subject to the objection.

1 THE WITNESS:

2 I agree with that, totally.

3 But when your show comes up and it's
4 every single show that you have, that something
5 was wrong.

6 BY MR. MAUTERER:

7 Q. Would you agree with me that if the
8 renter found something that -- right or wrong,
9 if they thought it was wrong, that they had the
10 right to, at least, complain about it?

11 MR. GIRAUD:

12 Object as to form. You can answer,
13 subject to the objection.

14 THE WITNESS:

15 I agree. I agree.

16 But I know we did some things right.

17 BY MR. MAUTERER:

18 Q. To your knowledge, has the Florida
19 Parishes Arena banned any of its show producers
20 or renters in the past, other than
21 Ms. Carpenter?

22 A. I don't know. I don't know.

23 Q. And I understand you didn't see or read
24 the letter that Ms. Carpenter received;
25 correct?

1 A. Correct.

2 Q. All right.

3 Were you provided any instructions from
4 Mr. Wells or anyone, if you saw Ms. Carpenter
5 at the Florida Parishes Arena after this letter
6 was sent out?

7 A. If I saw her at the Arena?

8 Q. Correct.

9 A. I did not -- no.

10 Q. So you weren't told one way or another,
11 if you see Ms. Carpenter at the Arena, please
12 call someone?

13 A. No.

14 Q. And if the decision by the
15 Administration to prohibit Ms. Carpenter from
16 renting the Arena was reversed and you're still
17 employed by the Arena, you wouldn't have a
18 problem with working with Ms. Carpenter
19 regarding her future shows; would you?

20 A. Absolutely not.

21 MR. MAUTERER:

22 I have no more questions.

23 MR. GIRAUD:

24 I have literally just a couple
25 follow-ups on something that you testified to

1 earlier.

2 EXAMINATION BY MR. GIRAUD:

3 Q. The other instance that they -- when
4 you said there was a man who cursed you out --

5 A. Yes.

6 Q. -- on the car show day?

7 MR. MAUTERER:

8 Uh-huh.

9 BY MR. GIRAUD:

10 Q. Clarification was, Counsel was asking
11 you as if he was a participant as a barrel
12 rider.

13 Was he a -- wait a minute, let me
14 finish the question.

15 A. Okay.

16 Q. Do you know for a fact that he was a
17 barrel rider or was he someone who was part of
18 the producing team or do you know?

19 A. I don't know.

20 Q. Okay. All right.

21 I'm not inferring one way or the other.
22 I just had no idea.

23 Okay. Thank you.

24 That's the only clarification that I
25 had.

1 COURT REPORTER:

2 Read and sign or waive?

3 MR. GIRAUD:

4 Under the law you have a right, because
5 you've given a deposition, to read and sign the
6 transcript before it becomes formal. You can't
7 change anything of substance. It's more
8 correcting grammatical errors and things like
9 that.

10 You also have the right to waive the
11 right to read and sign. Most people waive the
12 right. Robby and everybody has so far. You
13 just need to let the court reporter know what
14 you want to do.

15 THE WITNESS:

16 I'll -- whatever you --

17 MR. GIRAUD:

18 Waive it.

19 (Deposition concluded at or about 1:39
20 p.m.)

21

22

23

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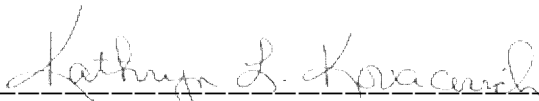
25

1 REPORTER'S PAGE

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

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

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

22
23 
24 KATHRYN L. KOVACEVICH
25 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 TONI JEAN C. CATALANO, 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 fifty-seven (157) 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

