

IN THE CIRCUIT COURT OF THE SIXTH JUDICIAL CIRCUIT
OF THE STATE OF FLORIDA IN AND FOR PINELLAS COUNTY
CIVIL DIVISION

MERRILL KING and KAREN KING,
Plaintiffs,

vs.

Case No.
19-001842-CI

SAINT PETERSBURG PRESERVATION,
INC., d/b/a PRESERVE THE 'BURG,
ALLENDALE TERRACE NEIGHBORS
UNITED, INC., ANNE DOWLING,
DEREK HESS, and PETER BELMONT,

Defendants.

DEPOSITION OF: ANNE C. E. DOWLING

DATE: December 3, 2019

TIME: 9:55 a.m. to 11:48 a.m.

PLACE: Trenam Kemker
200 Central Avenue
Suite 1600
St. Petersburg, Florida

PURSUANT TO: Notice by counsel for Plaintiffs
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Rules of Civil Procedure

REPORTED BY: Aaron T. Perkins, RMR, CRR, CRC
Notary Public, State of
Florida at Large

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Pages 1 to 83

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25 Peter Belmont

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I N D E X

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Exhibit 2 Electronic Articles of Incorporation for Allendale Terrace Neighbors United, Inc. Page 69

1 ANNE C. E. DOWLING,
2 the witness herein, being first duly sworn on oath, was
3 examined and deposed as follows:

4 DIRECT EXAMINATION

5 BY MR. HAYDEN:

6 Q. Good morning. I'm Tyler Hayden. I'm here on
7 behalf of the plaintiffs.

8 Can you state your name for the record,
9 please?

10 A. Anne Chisholm Elizabeth Dowling.

11 Q. And have you ever had your deposition taken
12 before?

13 A. Never.

14 Q. Have you ever sat through a deposition before,
15 maybe of somebody else?

16 A. When a first law associate at my firm, yes.

17 Q. Okay. The only reason I ask you -- and I'm
18 not trying to trip you up. I'm just trying to explain a
19 couple basic rules. We have a court reporter here. So
20 when I ask questions, no head nods, no shaking of the
21 heads. Just make audible responses, yeses or noes or an
22 elaborate response. But don't cut me off, and I won't
23 cut you off. If you need to take a break, just ask. If
24 you need me to explain something or restate it, just
25 ask. I just want to make sure the record is clear and

1 that your responses are audible and that you understand
2 my questions.

3 Do you understand that?

4 A. I do.

5 Q. Okay. Now, are you able to testify today?

6 A. I am.

7 Q. Okay. You're not on any prescription drugs or
8 alcohol that would prevent you from testifying?

9 A. Not that would prevent me from testifying.

10 Q. All right. And I understand I'm a little
11 under the weather, so I'm making sure you can understand
12 my voice. There's no hearing problems, or anything like
13 that?

14 A. I have vertigo, but no, nothing aside from
15 that.

16 Q. Otherwise, you can hear what I'm saying?

17 A. Yes.

18 Q. What did you do to prepare for today's
19 deposition?

20 A. I talked to Shirin, my counsel.

21 Q. Did you talk with anybody else?

22 A. No, I did not.

23 Q. Did you look through any documents or review
24 any papers?

25 A. I reviewed your filings.

1 Q. By my filings, do you mean --

2 A. Plaintiffs' filings.

3 Q. And what exactly were those filings?

4 A. The complaint, the amended complaint.

5 Q. Okay. I would like to start with a little bit
6 of a brief background.

7 Earlier, you mentioned that you had obtained a
8 law degree, so I just want to go through your
9 educational background.

10 A. Sure.

11 Q. Where you went to high school, start with
12 there.

13 A. Do you want me to go through it?

14 Q. Yeah. Just go through it, if you want.

15 A. I attended The Masters School in Dobbs Ferry,
16 New York, from 1988 -- I'm sorry, from 1984 to 1988. I
17 graduated in '88 with all honors. I then attended Duke
18 University. I applied for early decision and was
19 accepted. I graduated in 1992. I have received three
20 degrees -- two degrees since then, a master's in 1994
21 from Williams College in the history of art and a law
22 degree from the College of William and Mary, where I was
23 the editor -- one of the editors of the Environmental
24 Law and Policy Review.

25 Q. Okay. What did you do after -- let's start

1 with after high school. I want to go through some of
2 your work history.

3 A. Sure.

4 Q. Where did you work after high school?

5 A. I worked during high school. I worked in
6 museums the entire time I was in high school, as
7 internships, including the Metropolitan, the museum, New
8 York, and other places like that. And then I went to --
9 after high school and when I was in college?

10 Q. Sure.

11 A. Okay. I continued to do interning in museums
12 due to my love of art history. And following college, I
13 went directly into graduate school from '92 to '94. And
14 then during the summers we were required to travel to
15 Europe, so I traveled to Europe.

16 Q. Where in Europe did you go?

17 A. All over.

18 Q. All over.

19 And this was for an art focus or for history?

20 A. Art history.

21 Q. Okay. A little bit of both?

22 A. It's art history. It's a separate discipline.

23 Q. Okay. Now, you mentioned that you had gotten
24 a law degree.

25 Did you ever work as a lawyer?

1 A. I did.

2 Q. Where did you work as a lawyer?

3 A. Williams Mullen Clark and Dobbins.

4 Q. Okay. Is that a private law firm?

5 A. It is.

6 Q. Okay. Where is that located?

7 A. Virginia, Richmond.

8 Q. And was that a litigation firm or what type of
9 work were you doing?

10 A. I did energy work and conservation.

11 Q. Can you elaborate a little bit on what exactly
12 that means?

13 A. Sure. I worked -- our major client -- we were
14 lobbyists, and our major client during the deregulation
15 of the Virginia Energy System was PJM, which is
16 basically the people who controlled the generation --
17 don't control the generation side, but control the
18 distribution side of energy, so we worked representing
19 PJM.

20 Q. So as a lobbyist, I imagine you probably had a
21 lot of involvement with government?

22 A. Some.

23 Q. Okay. What capacity?

24 A. Talking to different entities and trying to
25 work through issues involving deregulation.

1 Q. Okay. And "different entities," are you
2 talking about legislators and that type of thing?

3 A. I was a first year law associate, so I did
4 pretty much none of the front stuff. You know how it
5 goes.

6 Q. But you were doing some of the background
7 work?

8 A. Right.

9 Q. Okay. And when did you stop doing work as a
10 lobbyist?

11 A. I stopped doing work as a lobbyist when I
12 moved to -- it wasn't really a lobbyist. Let's go back
13 to doing that. When I was a lobbyist, I worked for the
14 Virginia Conservation Network. That's what I did my
15 lobbying in. When I went to law school, I was an energy
16 attorney in the energy department.

17 Q. Okay. Approximately what year was this that
18 you were the Virginia lobbyist?

19 A. You mean the head of the Virginia Conservation
20 Network?

21 Q. Yes.

22 A. So, again, I didn't do an extreme amount of
23 lobbying. I organized other lobbyists behind the
24 scenes. I'm not very good at public speaking --

25 Q. Okay.

1 A. -- not my forte.

2 Q. Approximately what years?

3 A. Let me think. That would be '94 to -- I will
4 have to look it up. I don't want to say something
5 incorrect.

6 Q. No, that's okay. That's fine.

7 And then after that I imagine you were living
8 in Virginia. And at that time what brought you down to
9 St. Petersburg? Because eventually you moved here,
10 correct?

11 A. My husband's family grew up here and has lived
12 here since 1970 something.

13 Q. And you said your husband. Is that Derek
14 Hess?

15 A. That is.

16 Q. Okay. Did you meet him in school?

17 A. I did.

18 Q. Okay. What school?

19 A. Duke University.

20 Q. Okay. What year did you move back to
21 St. Petersburg or what year did Derek move back and you
22 moved here for the first time?

23 A. Well, we had lived in Tampa before that while
24 Derek was in medical school. It's either 2002 or 2004.
25 I want to say it's 2004.

1 Q. And when you moved to St. Pete, or
2 St. Petersburg, in 2004, did you immediately move to the
3 Allendale neighborhood or --

4 A. We immediately moved to the Allendale
5 neighborhood, Allendale Terrace.

6 Q. Thank you. I will be more specific.

7 A. Okay.

8 Q. All right. We'll get to Allendale in a little
9 more detail in a moment, but, first, I want to talk
10 about some of the documents that your counsel produced
11 in response to plaintiffs' request for production in
12 this case.

13 Do you understand that your counsel did
14 produce a significant amount of documents to the
15 plaintiffs? Over the last month, or so, we've been
16 getting documents from your office.

17 You understand that, right?

18 A. I do.

19 Q. Okay. Now, I want to talk just a minute how
20 those documents were found and what you did to produce
21 those.

22 A. Sure.

23 Q. I want to talk about -- do you have a cell
24 phone?

25 A. I do.

1 Q. Okay. And what model cell phone is it?

2 A. I'm not technical. No clue. 7S Apple iPhone.

3 Q. It's an Apple?

4 A. Yes.

5 Q. Okay. Is that your only cell phone?

6 A. That's my only cell phone.

7 Q. Okay. What cell phone provider do you have?

8 A. AT&T.

9 Q. And what is your cell phone number?

10 A. (727) 366-0207.

11 Q. And what about your husband, Derek? Does he

12 also have an Apple iPhone?

13 A. He does.

14 Q. And what is his cell phone number?

15 A. (727) 452-1641.

16 Q. Does he also use AT&T?

17 A. He does.

18 Q. And your son William Hess, does he have an

19 Apple iPhone as well?

20 A. He does.

21 Q. Okay.

22 A. I cannot provide you his number. I haven't

23 memorized it.

24 Q. Okay. Are you-all on a family plan, everybody

25 with AT&T?

1 A. Yes.

2 Q. Okay.

3 A. Derek's is through his office. Ours is
4 through a family plan.

5 Q. Okay.

6 A. When I say "ours," I'm speaking of me,
7 William, and Oliver.

8 Q. Thank you.

9 And just to be clear, does Oliver have an
10 iPhone as well?

11 A. He does.

12 Q. Okay. I want to talk about other electronic
13 devices that you as a family have starting with you.

14 Do you have a computer?

15 A. I have a desktop Dell.

16 Q. Do you have an iPad or a tablet?

17 A. I'm not technical. I have nothing other than
18 an iPhone and a desktop Dell.

19 Q. Okay. Same question for William. Does he
20 have a computer?

21 A. William purchased a new computer for use in
22 college at Duke University.

23 Q. Do you know if that's a Mac product, or is it
24 a Dell?

25 A. It's definitely a Mac product.

1 Q. Same question for Oliver. Does he have a
2 computer?

3 A. Oliver has a computer that he purchased for
4 school, and he also owns a Mac product. I cannot tell
5 you what kind.

6 Q. For your husband, Derek, does he have a
7 computer?

8 A. Derek owns a computer, yes.

9 Q. Okay.

10 A. It has been inoperable and sitting unused on
11 his desk for months.

12 Q. Okay. Does he share that desktop Dell that
13 you have now?

14 A. He does not.

15 Q. Okay. I imagine he has a work computer,
16 though?

17 A. I wouldn't know. I don't go to his office.

18 Q. Okay. What is your e-mail address?

19 A. Acderek, D-e-r-e-k, @aol.com.

20 Q. Do you have any other e-mail addresses?

21 A. If I do, I don't use them ever.

22 Q. Is that acderek@aol.com, is that an e-mail
23 address that your husband uses as well?

24 A. No.

25 Q. Does your husband have an e-mail address?

1 A. He does.

2 Q. Do you know what that is?

3 A. I believe it is derekhess@hotmail.com.

4 Q. And same question for William.

5 A. William has a new e-mail through Duke.

6 Q. Okay. Does he have a Gmail or Yahoo or some
7 other personal account?

8 A. He used to have a Gmail account through
9 Shorecrest Preparatory school. He does not any longer.

10 Q. Okay. Same question for Oliver.

11 A. Oliver has an e-mail account through Exeter,
12 where he attends school.

13 Q. So nobody has a Gmail account in your family?

14 A. If they do, again, I don't know much about it.
15 You would have to ask them. I don't want to say
16 something or speculate as to what they may or may not
17 have. I apologize.

18 Q. Understood.

19 If you don't know the answer to something,
20 just let me know.

21 A. Okay.

22 Q. What social media do you use, Ms. Dowling?

23 A. Only Facebook.

24 Q. Do you have any other social media accounts?

25 A. I have an Instagram account that was set up

1 that I don't understand how to use very well. Oh, wait.
2 I don't have -- wait. I don't -- I may have Instagram.
3 I don't even know if I have Instagram. I have Snapchat
4 so I can follow my children on Snap Map, and that is all
5 I do with it.

6 Q. Do you have an account on Nextdoor?

7 A. I do have an account on Nextdoor.

8 Q. Any other social media accounts that you can
9 think of?

10 A. None that I can think of. I think I have -- I
11 think -- I follow some things on Twitter, but I don't
12 know, and I don't believe I have ever tweeted anything.

13 Q. Okay. Same question for Derek. Does he have
14 Facebook?

15 A. Derek does not have Facebook. Derek has no
16 social media at all that I'm aware of.

17 Q. Okay. Thank you. That makes it a little bit
18 simpler.

19 A. Okay.

20 Q. Same question for William. Does he have any
21 social media?

22 A. I'm sure he does. I could not tell you what
23 they are.

24 Q. Do you know if he's on Facebook?

25 A. I believe that -- someone set up an account

1 for him. I could not tell you yes or no.

2 Q. Does he have Instagram?

3 A. I do not know.

4 Q. You mentioned he has Snapchat, though?

5 A. Yes.

6 Q. Same questions for Oliver. Does he have
7 Facebook?

8 A. Oliver has a Facebook account. The Facebook
9 founder attended his boarding school. All Exeter kids
10 are required to have a Facebook account.

11 Q. All right. So in providing documents to your
12 counsel prior to your counsel producing documents to us,
13 what did you do to search for documents that were
14 responsive to our request for production?

15 A. I went through my Dell desktop.

16 Q. And what does that mean? What does that
17 entail you went through? Did you use search terms, or
18 how did you go through?

19 A. I had saved everything that I could think of
20 under a file called 810, because I was dealing with a
21 different issue, and so I had just kept putting a lot of
22 stuff into that file. And so I started there.

23 Q. What is 810?

24 A. It's a different address.

25 Q. Different e-mail address or --

1 A. No. It's a different house address.

2 Q. What is that house address?

3 A. 810 35th Avenue North.

4 Q. And you mentioned that you were going through
5 a different issue. What was the different issue?

6 A. It was the demolition of 810 35th Avenue
7 North.

8 Q. Is that the demolition that took place by a
9 developer known as Taralon Homes?

10 A. I believe so, yes.

11 Q. Just so I can understand what exactly you did
12 with looking through your Dell desktop, are you saying
13 that, essentially, that you kept documents, e-mails,
14 text messages, records related to this 810 home and
15 that's where you started with your Dell desktop, because
16 there were documents that you put together in a file
17 there?

18 A. There were e-mails.

19 Q. E-mails.

20 A. And all of which have been, to the best my
21 knowledge, provided to you.

22 Q. Were there any text messages in that file?

23 A. I don't know how to do that. Remember, I have
24 zero technical skills.

25 Q. Now, prior to producing documents to your

1 counsel, did you search your e-mail account, the
2 acderek@aol.com?

3 A. Yes.

4 Q. Okay. What did you use to search it in terms
5 of, Did you use search terms or --

6 A. I believe I did. I can't recall. It's been a
7 while, but I searched incredibly thoroughly to provide
8 you with everything possible that I could.

9 Q. Do you remember the search terms that you
10 used, for example, "King" or an address, or do you
11 recall?

12 A. I don't recall. I probably started with the
13 810 file, probably "preservation," probably "Webb."

14 Q. And that 810 file, is that just a local file
15 that's kept on your Dell desktop in a Microsoft Windows
16 setup?

17 A. No. It's under my AOL account. Again, I'm
18 not technical. You're really dealing with basics here.

19 Q. Okay. I understand. I'm just trying to
20 understand what you did to search for documents.

21 A. Okay.

22 Q. Did you search your sent folder on your
23 aol.com?

24 A. Yes, I did.

25 Q. You searched your inbox?

1 A. Yes, I did.

2 Q. And did you search the -- you searched the 810
3 folder. You already mentioned that, right?

4 A. Yes.

5 Q. Did you search your deleted folder?

6 A. Yes.

7 Q. Any other archives you searched?

8 A. I don't have any other archives --

9 Q. Okay.

10 A. -- that I'm aware of.

11 Q. Did you search for responsive documents in
12 your husband's e-mail account, this
13 derekhess@hotmail.com?

14 A. Derek never, to the best of my knowledge,
15 responded to anything or was involved in this, so it
16 would have come up in my searches.

17 Q. So did you ever communicate with Derek via
18 e-mail about the Kings' home or the Webb house?

19 A. Derek and I would talk about it occasionally.
20 Derek works 80 hours a week. I barely get to talk to my
21 husband regularly as it is.

22 Q. Okay. That wasn't my question.

23 A. What's your question?

24 Q. Did you speak with Derek via e-mail about the
25 King house or the Webb house?

1 A. If I did, it has been provided to you, if he
2 was cc'd on something.

3 Q. All right. I want to talk about the text
4 messages that were produced.

5 A. Okay.

6 Q. How did you go about searching for responsive
7 text messages?

8 A. I provided my phone to this law office. I
9 kept --

10 MS. VESELY: Just as a reminder, we have an
11 attorney-client privilege, so our communications
12 regarding that -- and he's not even looking for --

13 MR. HAYDEN: Yeah, I don't want that.

14 MS. VESELY: Yeah. But I just wanted you
15 to --

16 BY MR. HAYDEN:

17 Q. Don't tell me what you and Ms. Vesely spoke
18 about. I just want to know in general terms what was
19 done to provide the Trenam law firm with text messages.

20 A. I looked through every single text message I
21 could find and provided them.

22 Q. And how did you go about looking for text
23 messages that would be responsive?

24 A. You can search in text messages, as you know.

25 Q. Well, I don't know that.

1 A. Do you have an iPhone? You can search. So if
2 you're looking for something, I could type in "Webb" or
3 "preservation."

4 Q. Did you use any other search terms besides
5 "Webb" or "preservation"?

6 A. Search terms?

7 Q. You just mentioned that you searched through
8 your iPhone --

9 A. Right. Not that I --

10 Q. -- using terms "Webb" and "preservation." Did
11 you use any other terms?

12 A. I said like those. If I did, I don't recall
13 which ones I used, but I did a very thorough search of
14 my text messages and provided them.

15 Q. Did you search any other devices other than
16 your iPhone for text messages, for example, Derek's
17 iPhone?

18 A. No, because I would have been texting my
19 husband, and it would have come up under mine.

20 Q. Did you search through William's iPhone for
21 text messages?

22 A. Again, I would have texted William, and it
23 would have come up.

24 Q. So is that a "no"?

25 A. That's a no.

1 Q. Same question for Oliver. Did you search
2 through his iPhone for text messages that might be
3 responsive to the plaintiffs' request for production?

4 A. Again, it would have come up because I would
5 have been texting him.

6 Q. Is that a "no"?

7 A. That's a "no."

8 Q. Same question for social media. How did you
9 go about searching for responsive documents within your
10 Facebook account?

11 A. I went on to my Facebook account, and I pulled
12 every single thing I could find related to the case and
13 any single thing that you had asked me to look for in
14 your request for production.

15 Q. Okay. I'm asking about specific search terms.
16 Which terms --

17 A. I can't recall.

18 Q. -- did you use?

19 A. But what I did is be very responsive to your
20 request for production.

21 Q. Okay. Same question for your Nextdoor
22 account.

23 A. I did the exact same thing.

24 Q. What date range did you use to search for
25 responsive documents?

1 A. I can't recall specifically, but it was the
2 date range that you requested in your request for
3 production, but I don't believe that I limited it to
4 anything to that.

5 Q. All right. Have we covered all of the devices
6 and accounts that you searched for? Strike that. Let
7 me say that again.

8 Did we just cover all the different accounts
9 and devices that you used to search for documents
10 responsive to plaintiffs' request for production?

11 A. If I had a device in my purview, it has been
12 searched.

13 Q. Okay.

14 A. I promise you that.

15 Q. Okay. Other than the iPhones that we just
16 discussed, the Facebook accounts, the 810 folder, the
17 AOL account, were there any other devices or e-mail
18 accounts that you -- or social media accounts -- that
19 you used to search for responsive documents?

20 A. I believe I was thorough in my search.

21 Q. Okay. That wasn't my question. I just want
22 to make sure -- and I'm not trying to trip you up here.
23 I'm trying to understand --

24 A. And I don't want to give you an answer that
25 limits me when I don't know. I was incredibly thorough

1 in giving you everything. I want you to have
2 everything.

3 Q. So the answer is you don't know if there are
4 any other devices other than the --

5 A. I do not believe there's anything else out
6 there that I have not thoroughly searched through in an
7 effort to provide you with every document in my
8 possession so you may have it for this case.

9 Q. Okay. And you mentioned that you did not
10 personally search through Derek or -- sorry, Derek,
11 William, or Oliver's cell phones for responsive text
12 messages.

13 Do you know if they searched through their
14 devices for responsive text messages?

15 A. They don't have anything.

16 Q. So is that a "no"?

17 A. Ask the question again, please. I'm sorry.

18 Q. Yeah.

19 You mentioned that you, Anne Dowling, did not
20 personally search through the iPhones of Derek, William,
21 and Oliver. Do you know if they searched through their
22 iPhones for the responsive text messages?

23 A. I don't, but I would have been the one
24 initiating the text message.

25 Q. So the answer is you don't know whether they

1 searched, or, no, they did not search?

2 A. I believe there's nothing on their phones.

3 That's the best I can do with that answer.

4 Q. Okay. But you're not answering my question.

5 A. I don't know.

6 Q. Did they search them?

7 A. I don't know.

8 Q. So everything that was responsive in your
9 possession, custody, and control to plaintiffs' request
10 for production has been produced?

11 A. Yes.

12 Q. I'm sorry to beat a dead horse. I want to
13 understand how records are kept in this case.

14 Since November 1st of 2018, have you deleted
15 any text messages or e-mails that you have?

16 A. No. Let me go back and say that again. I
17 have deleted nothing that's responsive to this case.

18 Q. And to your knowledge, is your phone set up to
19 auto delete text messages?

20 A. My phone is not, to the best of my
21 knowledge -- again, I have no technical knowledge -- set
22 up to delete anything.

23 Q. All right. Good news. We're done talking
24 about cell phone and Facebook accounts for a minute.

25 I want to go through a couple individuals that

1 are not identified fully by name or by phone number
2 within some documents that were produced by your
3 attorney, starting with Jim Stitt. Who is Jim Stitt?

4 A. Mr. Stitt is the -- what is he? The president
5 of the Allendale Neighborhood Association.

6 Q. How do you know Mr. Stitt?

7 A. Mr. Stitt has been known to me since I have
8 moved here. He's friends with my husband's family.
9 St. Petersburg is a tiny town.

10 Q. Now, within a lot of the documents that were
11 produced by your counsel, you have some significant
12 e-mails back and forth with Mr. Stitt regarding the
13 Kings and the Webb house. What do you recall the first
14 conversation you had with Mr. Stitt about the Kings'
15 home?

16 And if I refer to it as the Kings' home or the
17 Doc Webb house, we understand what that means, right?

18 MS. VESELY: Excuse me. Form objection.

19 BY MR. HAYDEN:

20 Q. Okay. Let me say it this way. Going forward,
21 I would like to be on the same page in understanding
22 that when I say the Webb home or the Kings' home, I'm
23 referring to 774 36th Avenue North in St. Petersburg.

24 You understand that, right?

25 A. I do.

1 Q. That's just so we're on the same page.

2 Now, let me refer to the prior question. When
3 do you recall first having conversations with Mr. Stitt
4 about the Webb home?

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

6 Q. Okay. Can you recall the last time you spoke
7 with Mr. Stitt about the Webb home?

8 A. Maybe a couple months ago. I can't recall.

9 Q. And what was Mr. Stitt's position on the Webb
10 home? And by "position," I mean was he pro-historical
11 designation?

12 A. Mr. Stitt supports preservation.

13 Q. Have you and Mr. Stitt worked together in
14 efforts to preserve other homes within the Allendale
15 Terrace neighborhood?

16 A. We have talked about issues relating to the
17 preservation in the Allendale neighborhood and the
18 Allendale Terrace neighborhood.

19 Q. Did you speak with Mr. Stitt about these
20 issues solely by e-mail, or would you text with him?

21 A. Mr. Stitt is even less inclined to text
22 anything. I do not believe we had a significant text
23 exchange. It was mostly telephone conversations and
24 e-mails.

25 Q. Okay. You mentioned you don't think there was

1 a significant text exchange. Were there any?

2 A. If there are any texts with Mr. Stitt, you
3 have been provided with them, to the best of my
4 knowledge.

5 Q. Moving on.

6 There's an employee with the City of
7 St. Petersburg by the first name of Shane. Do you know
8 a Shane that works with the City?

9 A. Shane works with the City of St. Petersburg.
10 He's an arborist.

11 Q. Do you know Shane's last name?

12 A. I do not.

13 Q. Did you speak with Shane regarding any
14 historic designation issues with the Webb home?

15 A. Never, to the best of my knowledge. He's a
16 tree guy.

17 Q. Did you speak with Shane regarding any tree
18 issues at the Webb home?

19 A. I believe other people spoke to Shane. I
20 don't think that I spoke to Shane directly about what
21 was going to happen with their demolition plan.

22 Q. Kelley Ann Matheson, do you know who Kelley
23 Ann Matheson is?

24 A. Kelly, yes. Sorry. I have never used her
25 middle name before. I do.

1 Q. Okay. Who is Kelly Matheson?

2 A. She's a friend of mine.

3 Q. Do you remember the first time you spoke with
4 Ms. Matheson about the Doc Webb home?

5 A. I don't recall the exact first date, so I
6 don't want to trip myself up.

7 Q. Okay. And do you remember the mediums with
8 which you would speak to Ms. Matheson about the Webb
9 home?

10 A. Mainly via texting.

11 Q. Did you have e-mails with Ms. Matheson about
12 the Webb home?

13 A. If I did have any e-mails, which I do not
14 believe that I did, they have been provided to you.

15 Q. Okay. What about a Sarah Howell? Do you know
16 Ms. Howell?

17 A. Sarah Howell is a real estate agent.

18 Q. Is she your real estate agent?

19 A. She represented us, yes.

20 Q. Represented you as a buyer or a seller or --

21 A. A seller of our home.

22 Q. Recently?

23 A. We sold our house in September.

24 Q. Do you know an individual named Elodie?

25 A. Elodie Martin, she's a friend of mine.

1 Q. Is that Martin, M-a-r-t-i-n?

2 A. Yes. Hold on. That's her married name.
3 She's now divorced. She goes by -- she will still
4 respond to Martin. I can get you the name if you need
5 it.

6 Q. Ms. Martin, is she -- does she live in the
7 Allendale neighborhood?

8 A. She does not.

9 Q. Is she a Realtor, or what does she do
10 professionally?

11 A. She is not. She's a speech pathologist.

12 Q. Did you have conversations with her about the
13 Webb home?

14 A. I have had text exchanges with her.

15 Q. Do you know what her cell phone number is?

16 A. I do not. I don't memorize anybody's cell
17 phone number except my husband's.

18 Q. How about an individual named Rhody,
19 R-h-o-d-y?

20 A. That is a woman who lives in my neighborhood.

21 Q. Do you know her last name?

22 A. I do not. I'm embarrassed to say that,
23 because she's a wonderful person.

24 Q. You said she lives in your neighborhood. Does
25 she live on 36th Avenue or 35th?

1 A. I do not know her address.

2 Q. Okay.

3 A. I can visualize her house, but I don't know
4 her exact address.

5 Q. Did you have conversations with her regarding
6 the Webb home?

7 A. I did.

8 Q. And in what form are those communications?

9 A. Texts, probably a telephone call.

10 Q. Do you remember the approximate time frame
11 those texts and phone calls were under?

12 A. Probably starting as far back as 2017, not
13 about the Webb house.

14 Q. What about historic preservation?

15 A. I started speaking to her in 2017 when I got
16 to know her, being a friendly neighbor.

17 Q. What about Greg Tappan?

18 A. Greg Tappan lives in Allendale proper. I
19 believe we also started speaking in 2017.

20 Q. Did you speak with Mr. Tappan regarding the
21 Webb home?

22 A. I did.

23 Q. And what medium were you communicating with
24 him?

25 A. E-mail, text, and telephone.

1 Q. I think I probably know the answer to this,
2 but do you know what his telephone phone number is?

3 A. I have no earthly idea.

4 Q. Okay. Nina Light, who is Nina Light?

5 A. Nina Light is the former president of the
6 Allendale Neighborhood Association and president of the
7 Allendale Crime Watch.

8 Q. And that's distinct from the Allendale Terrace
9 Neighbors United entity, correct?

10 A. Two separate neighborhoods.

11 Q. Okay.

12 A. Correct.

13 Q. Now, did you communicate with Ms. Light about
14 the Webb property?

15 A. Mainly via telephone, some e-mails.

16 Q. All right. You mentioned a moment ago that
17 you moved to St. Pete, I believe you said, in 2004,
18 right?

19 A. Uh-huh (Indicates affirmatively).

20 Q. Okay. And you moved --

21 A. I'm sorry. Yes.

22 Q. Thank you.

23 A. You're welcome.

24 Q. And you said you moved directly to the
25 Allendale area, right?

1 A. We did.

2 Q. Okay. So how long have you lived there, then,
3 continuously?

4 A. I'm not good with math. I wasn't aware there
5 were going to be math questions asked. I will subtract
6 it. We lived there until 2019.

7 Q. And how familiar are you with the neighbors in
8 the neighborhood?

9 A. Very.

10 Q. Okay. Can you elaborate? How are you
11 familiar?

12 A. We have block parties, we're friends with
13 everyone on our street.

14 Q. Anything else? Organizations that you were
15 involved in within the community? And by "community," I
16 mean Allendale.

17 A. In Allendale --

18 Q. Yes.

19 A. -- Terrace?

20 MS. VESELY: Terrace?

21 BY MR. HAYDEN:

22 Q. Yes.

23 A. What are you looking for?

24 Q. You said that you're very familiar with the
25 Allendale Terrace neighborhood. I'm trying to

1 understand how you are familiar with the Allendale
2 Terrace.

3 A. I'm a good neighbor.

4 Q. Okay.

5 A. I speak to my neighbors.

6 Q. You say you speak with your neighbors. You
7 mean just if you're out walking the dog or something,
8 you have friendly conversations with people?

9 A. Uh-huh (Indicates affirmatively). I'm sorry,
10 yes.

11 Q. Okay. And you have conversations with
12 neighbors in the context of, for example, the Allendale
13 Crime Watch entity?

14 A. I wouldn't necessarily speak to my neighbors
15 about what's going on in a different neighborhood.

16 Q. All right. Do you know when the Allendale
17 Terrace neighborhood was built?

18 A. The Allendale -- when was it built
19 historically?

20 Q. Yeah.

21 A. I don't. But it was definitely done early on
22 in the history of St. Petersburg as far as I understand.
23 I think it was one of the original neighborhoods
24 plotted.

25 Q. Is the Allendale Terrace neighborhood, is it

1 designated as historic?

2 A. No. But there are houses in it that are.

3 Q. Now, you mentioned that you recently sold your
4 home in Allendale Terrace, correct?

5 A. Yes.

6 Q. Okay. And when did you sell it?

7 A. September of 2019.

8 Q. And you listed it with a Realtor,
9 Ms. Matheson?

10 A. No.

11 Q. Okay. You used a different Realtor to list
12 the house?

13 A. I listed it with Sarah Howell, as I said
14 earlier.

15 Q. Okay. Do you remember when you first listed
16 your home in Allendale Terrace for sale?

17 A. I do not recall specifically. I can get that
18 information for you if you so -- if you need it.

19 Q. Do you remember the approximate time frame?
20 Was it fall of 2018, spring of 2019?

21 A. I want to say spring of 2019, but I don't
22 recall specifically.

23 Q. Do you know if it was before or after March of
24 2019?

25 A. I would prefer to look it up instead of

1 speculate. I'm sorry.

2 Q. And how much did your home sell for? You said
3 it, ultimately, sold in September of '19. What was
4 the --

5 A. \$808,000.

6 Q. And what did you originally have it listed
7 for?

8 A. I believe it was 889.

9 Q. And what prompted you to sell the home?

10 A. Multiple factors.

11 Q. What were those multiple factors?

12 A. Construction, demolition, noise. We had a
13 desire to simplify and because we would have had to sell
14 if we were going to purchase the Webb estate.

15 Q. So by that, do you mean you needed the funds
16 from the sale of your home in order to purchase the Webb
17 estate?

18 A. Yes.

19 Q. Was the real estate market and the general
20 uptick in the real estate market, was that a factor in
21 you wanting to sell the home?

22 A. I have no desire -- no information on that
23 whatsoever of what the real estate market was or was not
24 doing.

25 Q. So an increased value in your home had no

1 bearing or no relation to you wanting to sell it?

2 A. No. An increase in my son attending college
3 might have, but nothing else.

4 Q. So by that, were you looking to downsize with
5 the kids moving out of the house?

6 A. We are looking to simplify our lives.

7 Q. And what do you mean by "simplify"?

8 MS. VESELY: Let me know -- hold on a second.
9 I'm sorry. I'm just going to object to the form
10 because I don't know what time frame we're at if
11 we're talking about --

12 THE WITNESS: I don't either. I'm very
13 uncomfortable with that.

14 MS. VESELY: -- at the time of the sale or the
15 time of the listing or now.

16 MR. HAYDEN: Okay. You can object and then --

17 MS. VESELY: I know. I'm just going to object
18 to the form regarding time frame, because I think
19 we're just a little all over the place.

20 BY MR. HAYDEN:

21 Q. Okay. So the spring of 2019 --

22 A. I don't know.

23 Q. -- when you listed the home for sale --

24 A. I will have to answer these questions after I
25 confirm when we listed the house for sale.

1 Q. Okay. But you said you wanted to simplify
2 your life.

3 A. We don't need -- we don't need as much. My
4 children are in school. One is at boarding school; one
5 is going to college.

6 Q. And you don't need as much space. Is that --

7 A. I don't need as much of anything.

8 Q. -- what you mean?

9 A. You're not 49. When you get to be 49, you
10 don't want as much of anything. You want simplicity and
11 family time.

12 MS. VESELY: Just a reminder, let him finish
13 his question --

14 THE WITNESS: Sorry.

15 MS. VESELY: -- before you answer.

16 BY MR. HAYDEN:

17 Q. Now, you, ultimately -- you still live in
18 St. Petersburg, correct?

19 A. We do.

20 Q. So you moved to a new home within
21 St. Petersburg?

22 A. We did. We purchased a new home.

23 Q. Okay. What was the purchase price of that new
24 home?

25 A. 475, 450 -- I don't recall. 400 and

1 something. High 400s.

2 Q. All right. Let's change topics and talk about
3 Doc Webb.

4 Who was Doc Webb?

5 A. Doc Webb is a figure in St. Petersburg
6 folklore and a businessman.

7 Q. Anything else about him that you know?

8 MS. VESELY: Excuse me. Object to form.

9 THE WITNESS: I know a lot about Doc Webb
10 because my sons were in a play.

11 BY MR. HAYDEN:

12 Q. Okay. I will just ask more specifically: Why
13 was Doc Webb important to St. Petersburg?

14 A. He was a businessman who helped put
15 St. Petersburg on the map.

16 Q. How did he put St. Petersburg on the map?

17 A. He was a merchant, and he owned many, many
18 stores.

19 Q. Do you have a personal interest in Doc Webb?

20 A. I do not.

21 Q. Now, you mentioned he owned many, many stores
22 in St. Petersburg.

23 Do you know where those stores were located?

24 A. They were located in an area called Webb City.

25 Q. Did he have any other stores that were located

1 outside of Webb City?

2 A. I do not know.

3 Q. Do you know of any other buildings within the
4 City of St. Petersburg that Doc Webb was associated
5 with?

6 A. I have heard other buildings referenced
7 throughout this proceeding. I do not know much more
8 than that.

9 Q. I would like to talk a minute about Preserve
10 the 'Burg or St. Petersburg Preservation, Inc., known as
11 Preserve the 'Burg.

12 Are you familiar with that entity?

13 A. I am.

14 Q. How are you familiar with that entity?

15 A. I am a member.

16 Q. How long have you been a member?

17 A. I don't recall the exact length of time I have
18 been a member.

19 Q. Is it --

20 A. Gift memberships have been purchased for me,
21 and I would have to go back and check my records.

22 Q. Is it longer than ten years?

23 A. I don't believe it's even close to ten years.

24 Q. Is it longer than five years?

25 A. I do not know.

1 Q. Was it less than five years?

2 A. I do not know.

3 Q. How did you first become familiar with
4 Preserve the 'Burg?

5 A. Preserve the 'Burg offers tours to the fourth
6 grade class at Shorecrest Preparatory School.

7 Q. Did you go on that tour?

8 A. My sons both went on the tour at separate
9 times and were enthralled.

10 Q. And when would your sons have been in fourth
11 grade?

12 A. I'd have to, again, go back and look. I don't
13 want to tell you a date that is incorrect. A long time
14 ago.

15 Q. So you have been familiar with Preserve
16 the 'Burg, then, for a long time if you first became
17 aware of them a long time ago, right?

18 A. I would say yes.

19 Q. Do you have personal contact information, cell
20 phones, e-mail addresses with members of Preserve
21 the 'Burg?

22 MS. VESELY: Form objection.

23 THE WITNESS: Emily Elwyn and I are friends.

24 BY MR. HAYDEN:

25 Q. Anyone else?

1 A. Mr. Belmont and I have had correspondence.

2 Q. Anyone else at Preserve the 'Burg?

3 A. Not that I'm aware of at this time.

4 Q. What about an Allison Stribling?

5 A. I have never met Allison Stribling.

6 MS. VESELY: Did you say Stribling?

7 MR. HAYDEN: I think that's her name, yeah.

8 THE WITNESS: I think it's Stribling.

9 MR. HAYDEN: Stribling.

10 THE WITNESS: S-t-r-i-b-l-i-n-g, based on the
11 request for production that you asked for.

12 BY MR. HAYDEN:

13 Q. Thank you.

14 How long have you been friends with Ms. Elwyn?

15 A. Since our children were little in school.

16 Q. And how many approximate years is that?

17 A. Twelve maybe.

18 Q. And same question for Mr. Belmont: How long
19 have you known Mr. Belmont?

20 A. Define "known."

21 Q. How long have you had Mr. Belmont's cell phone
22 number such that you communicate with him via text?

23 A. Only since the beginning of when I filed the
24 application and well after that initial filing.

25 Q. And by "the application," do you mean the

1 application for the historic designation of the Doc Webb
2 home?

3 A. Yes.

4 Q. How were you introduced to Mr. Belmont?

5 A. I believe Emily put us together.

6 Q. Did she make the introduction in person or
7 provide you with his --

8 A. I think it was in an e-mail.

9 Q. How many other applications for historic
10 designation have you filed with the
11 City of St. Petersburg?

12 A. One.

13 Q. Was that the application for the 810 home that
14 we were discussing earlier?

15 A. It was.

16 Q. What year approximately was that?

17 A. I believe it was 2017.

18 Q. Any other historical designation activities
19 that you have participated in with Preserve the 'Burg?

20 MR. ROSS: Object to the form of the question.

21 MS. VESELY: Join.

22 THE WITNESS: I have provided testimony to
23 city council before on other entities.

24 BY MR. HAYDEN:

25 Q. Anything else?

1 A. I have attended a porch party and another
2 event at the bird cage homes.

3 Q. Now, through your efforts with historic
4 designation, have you ever had any disputes with any
5 developers in town?

6 MS. VESELY: Form.

7 THE WITNESS: Through my efforts with historic
8 preservation?

9 BY MR. HAYDEN:

10 Q. Yes.

11 MS. VESELY: I'm sorry. Can you define
12 "disputes"? I mean, legal disputes?

13 THE WITNESS: Yeah. "Disputes" is way too
14 broad.

15 MR. HAYDEN: You've had your objection. She
16 can answer the question.

17 THE WITNESS: I find "disputes" to be broad.
18 Could you please help me?

19 BY MR. HAYDEN:

20 Q. All right. Have you ever had any public
21 disagreements with any developers in town regarding
22 their development of properties you would deem as
23 historic?

24 MS. VESELY: Form.

25 THE WITNESS: Public as in what?

1 BY MR. HAYDEN:

2 Q. You were featured in a newspaper or a radio
3 story with any kind of dispute with a developer.

4 A. Are you speaking of the WMNF interview about
5 the tree?

6 Q. Yes, that's one of them. I'm asking about any
7 others.

8 A. Okay. That is a public dispute that I had.

9 Q. And who was that public dispute with?

10 A. It never involved speaking to a developer. It
11 involved saving a tree that had been promised to be
12 saved.

13 Q. You said "promised to be saved." Who promised
14 to save it?

15 A. It is my understanding that Taralon received a
16 variance on a setback for the house that they were
17 building at 800 35th Avenue North on the former site of
18 810 35th Avenue North by saving, i.e., not cutting down,
19 the tree that was also located on that property.

20 Q. Have you ever had any other disagreements with
21 developers within the Allendale Terrace neighborhood?

22 MS. VESELY: Form objection.

23 THE WITNESS: Disagreements?

24 BY MR. HAYDEN:

25 Q. Yes.

1 A. There have been code compliance issues, yes.

2 Q. And by "code compliance issues," do you mean
3 that you referred developers within the Allendale
4 Terrace neighborhood to the City of St. Petersburg for
5 code violations?

6 A. I utilized SeeClickFix to report code
7 violations.

8 Q. And were those violations that you observed
9 regarding developers within the Allendale Terrace
10 neighborhood?

11 A. These are violations that I observed.

12 Q: Approximately how many violations did you
13 report using that?

14 A. I do not know.

15 Q. Was it more than five?

16 A. More than five.

17 Q. Was it more than ten?

18 MS. VESELY: Form.

19 THE WITNESS: It was more than five, most
20 likely more than ten. I don't know.

21 BY MR. HAYDEN:

22 Q. Do you know if any of those reported
23 violations resulted in a developer being fined for any
24 code violations?

25 A. I have no idea.

1 Q. Did you ever report any developers within the
2 Allendale Terrace neighborhood to any other
3 administrative body?

4 A. I reported them to the office of Pam Bondi's
5 office, Taralon.

6 Q. And did you file a formal complaint against
7 Taralon?

8 A. I don't know what it constituted that I filed.

9 Q. Do you know what year that was in?

10 A. I could look it up. I don't recall sitting
11 here. 2018, potentially.

12 Q. Was it before the filing of the application
13 for the Doc Webb estate?

14 A. I believe that it was. I do not recall.

15 Q. Do you know if Pam Bondi's office ever took
16 any formal action against Taralon based on the filing
17 that you submitted?

18 A. I do not believe that they -- I don't know. I
19 do not believe that they did.

20 Q. So no action was taken by Ms. Bondi's office?

21 A. I don't know.

22 Q. Did you speak with Taralon before filing
23 that -- I guess we'll call it a complaint -- before
24 filing that complaint with Pam Bondi's office?

25 MS. VESELY: Form.

1 THE WITNESS: Taralon made it clear that they
2 would never speak to me.

3 BY MR. HAYDEN:

4 Q. How did they make it clear to you?

5 A. The owner of Taralon came out and said, "I
6 never have to speak to you," and made it very clear that
7 he never would speak to me.

8 Q. Was that the first interaction with him?

9 A. That's the first and only interaction I have
10 ever had with him.

11 Q. Do you know what his name is?

12 A. Mike Bartoletta.

13 Q. Do you remember the approximate date of that
14 interaction?

15 A. It must have been right after they purchased
16 the 810 property.

17 Q. I would like to go back to your relationship
18 with Mr. Belmont.

19 You mentioned that your friend Emily Elwyn
20 introduced him to you, and you think it was via e-mail,
21 right?

22 A. I believe so, yes.

23 Q. And at that time did you know that Mr. Belmont
24 was an attorney?

25 A. I believe -- I believe I knew Peter was an

1 attorney. I knew he had given tours. I'm not sure.

2 Q. Did you seek legal advice from Mr. Belmont?

3 A. No.

4 Q. Did you ever consider Mr. Belmont to be your
5 attorney?

6 A. No.

7 Q. Did you want him to be?

8 A. I asked him to help me with the application,
9 yes.

10 Q. Did you ever ask him to be your agent in
11 negotiating with the City of St. Petersburg after you
12 filed the application on the Doc Webb estate?

13 MS. VESELY: Form objection.

14 THE WITNESS: I asked Mr. Belmont generally to
15 help shepherd the application after I had filed it.
16 I don't believe that constitutes agency.

17 BY MR. HAYDEN:

18 Q. Did you authorize him to speak on your behalf
19 with the City?

20 A. With the City?

21 Q. Yes.

22 A. Define "the City."

23 Q. The City of St. Petersburg.

24 A. He spoke in meetings on telephone conferences
25 with Mr. Cremer. Derek Kilborn happened to be in the --

1 and maybe another person happened to be on that
2 telephone conversation.

3 Q. Was that other person Michael Dema?

4 A. I have no idea if Mr. Dema was in the
5 telephone conversation. He wasn't in the one that -- I
6 don't believe he was on the phone in the conversation
7 that I participated in as well.

8 Q. Okay. Now, you mentioned that you wanted
9 Mr. Belmont to -- I believe you used the word
10 "shepherd." You wanted him to shepherd the application
11 through the City of St. Petersburg.

12 Is that what you said?

13 A. That's what I said.

14 Q. Okay. So in doing so, did you authorize
15 Mr. Belmont to speak on your behalf?

16 MS. VESELY: Excuse me. Form objection.

17 THE WITNESS: I authorized Mr. Belmont --
18 authorization implies that I control him somehow.
19 I don't. He was merely helping with an
20 application.

21 BY MR. HAYDEN:

22 Q. So prior to the telephone conference with Jake
23 Cremer, Derek Kilborn, and, perhaps, Michael Dema you
24 mentioned before, did you not permit Mr. Belmont to
25 speak on your behalf?

1 A. I asked Mr. Belmont to help with the
2 application. I'm a terrible public speaker. I don't
3 enjoy these things.

4 Q. So in helping with the application, wouldn't
5 that entail speaking on your behalf at this telephone
6 conversation?

7 MS. VESELY: Form objection.

8 THE WITNESS: It entailed what I wanted it to
9 entail, was bolstering the physical application.
10 And when I couldn't participate in telephone calls,
11 Mr. Belmont participated in telephone calls.

12 BY MR. HAYDEN:

13 Q. And he participated in those telephone calls
14 on your behalf, right?

15 MS. VESELY: Form objection.

16 THE WITNESS: I just couldn't make the
17 telephone call. He wasn't doing anything
18 unnecessarily on my behalf.

19 BY MR. HAYDEN:

20 Q. So he wasn't speaking for you since you
21 couldn't attend?

22 A. We are with each other. We are not above and
23 for each other. Does that make sense?

24 Q. No. Explain that.

25 A. Okay. I wanted a better application with

1 somebody who understands the City better than I do.

2 Q. Okay. Anything else?

3 A. That's what I wanted.

4 Q. And did Mr. Belmont assist you with making
5 that better application?

6 A. He was asking a friend, whose name I don't
7 know, to potentially help with that. It never came to
8 fruition.

9 Q. Was that friend a Howard Hansen? Does that
10 name sound familiar?

11 A. The name Howard is familiar. I do not know
12 the last name.

13 Q. Did Preserve the 'Burg assist you with the
14 preparation of the application in any way?

15 A. Clearly not.

16 Q. But you wanted them to, right?

17 MS. VESELY: Form objection.

18 THE WITNESS: No.

19 MR. ROSS: Object to the form of the question.

20 BY MR. HAYDEN:

21 Q. Did you not want Preserve the 'Burg to assist?

22 A. I didn't ask for Preserve the 'Burg's help to
23 file the application.

24 Q. Not to file it, but you wanted them to help
25 revise it, right?

1 A. After, yes.

2 Q. After it was filed?

3 A. After it was filed, yes.

4 Q. And other than simply revising the
5 application, you asked Mr. Belmont to also assist with
6 negotiations with Jake Cremer as well, right?

7 MR. ROSS: Object to the form of the question.

8 MS. VESELY: Join.

9 THE WITNESS: I asked Mr. Belmont when I could
10 not make things to listen in and hear what
11 Mr. Cremer had to say. I was unavailable. We were
12 traveling.

13 BY MR. HAYDEN:

14 Q. And then you expected Mr. Belmont to relay
15 that conversation back to you?

16 MS. VESELY: Object to the form of the
17 question before she finished her answer.

18 BY MR. HAYDEN:

19 Q. I'm sorry. Were you done or --

20 A. I might have wanted to say more.

21 Q. Okay. Go ahead.

22 MR. ROSS: Could you read back --

23 THE WITNESS: Please repeat it.

24 MR. ROSS: -- all of her answer to that last
25 question. I got as far as she was traveling, and

1 then I lost it.

2 (A portion of the record was read by the
3 reporter.)

4 BY MR. HAYDEN:

5 Q. Anything else you would like to add after
6 traveling?

7 A. I'm not too good on how the City works, and I
8 wanted Mr. Belmont's help to help with the application
9 and to help make this a good process.

10 Q. So did you want Mr. Belmont to help with
11 communications with the City?

12 A. I wanted Mr. Belmont to help me in general.
13 I'm not good at, like I said, public speaking,
14 negotiations. I'm a research and writing person.

15 Q. So if you wanted Mr. Belmont to help you in
16 general, did you also want him to help with your
17 communications with the City?

18 MS. VESELY: Form.

19 THE WITNESS: If there were calls that were
20 going on with the City and I couldn't attend, then,
21 yes, Mr. Belmont would participate in the call and
22 then he would, along with Mr. Stitt and other
23 people, let me know how the call went.

24 BY MR. HAYDEN:

25 Q. So he would relay back to you what occurred on

1 a call --

2 A. Yes.

3 Q. -- if you were unable to attend? And by
4 "him," I mean Mr. Belmont.

5 A. Yes.

6 Q. And then would you give him directions after
7 the call on --

8 A. We would talk about stuff. I'm not trying to
9 get anybody to do anything.

10 Q. Did you talk about next steps?

11 A. A lot of us, I believe, spoke about what would
12 be the good way to go about doing things to help the
13 designation process along.

14 Q. So would it be fair to say that you were
15 working in concert with one another?

16 MR. ROSS: Object to the form of the question.

17 MS. VESELY: Join.

18 THE WITNESS: It would be fair to say that we
19 were all working for an amicable resolution to my
20 filing of the application to the benefit of
21 preservation.

22 BY MR. HAYDEN:

23 Q. So you were working together with Mr. Belmont
24 on moving the application through the City?

25 MR. ROSS: Object to the form of the question.

1 MS. VESELY: Form objection.

2 THE WITNESS: We were working on the same side
3 of preservation. Does that make sense?

4 BY MR. HAYDEN:

5 Q. No. Explain that.

6 A. We all wanted the house to be preserved, and
7 we wanted to put forward a good application.

8 Q. And in order to put forward a good
9 application, you were working together with Mr. Belmont?

10 MR. ROSS: Object to the form of the question.

11 MS. VESELY: Objection to form.

12 THE WITNESS: Mr. Belmont and I and others all
13 worked together to put a good foot forward with
14 this application.

15 BY MR. HAYDEN:

16 Q. So you were communicating with one another
17 about the application after it was filed, correct?

18 A. Yes.

19 Q. And Mr. Belmont was communicating with
20 Mr. Cremer, right --

21 A. Yes.

22 Q. -- about the application, correct?

23 A. I believe so, yes.

24 Q. And Mr. Belmont was also communicating with
25 Derek Kilborn about the application, right?

1 A. I believe so in the context of the meetings
2 that took place.

3 Q. And Mr. Belmont was also communicating with
4 Mr. Dema about the application?

5 A. I have no knowledge about what Mr. Belmont was
6 doing with Mr. Dema. You would have to ask Mr. Belmont
7 these questions.

8 Q. Was Mr. Belmont communicating with Jake Cremer
9 about a potential purchase of the Webb estate -- strike
10 that.

11 Was Mr. Belmont communicating with Jake Cremer
12 about your potential purchase of the Webb estate?

13 A. At some point, yes.

14 Q. And in what capacity was he communicating with
15 Mr. Cremer?

16 A. I believe he relayed to them that we may be a
17 potential buyer. And by "we," I mean me and my husband,
18 Derek.

19 Q. Was he communicating with anyone at the City
20 regarding that potential purchase?

21 A. I have no idea if he communicated with anybody
22 at the City about the potential purchase.

23 Q. Now, after the application was filed and prior
24 to the hearings with CPPC and the city council, were you
25 working with Preserve the 'Burg regarding research to

1 support the application?

2 A. No.

3 Q. Were you requesting that they assist with the
4 application?

5 A. The only person who was asked was Howard. He
6 said no, thank you, or he didn't choose to help. I
7 don't know. And we progressed.

8 Q. Did you ask Ms. Elwyn for assistance with the
9 hearings before the CPPC?

10 A. Define "assistance."

11 Q. Did you ask her to attend the hearing and
12 speak in support?

13 A. Preserve the 'Burg was already doing that
14 themselves. I didn't have to ask Ms. Elwyn to do that.
15 It's part and parcel of their mission.

16 Q. Well, did you ask her?

17 A. I don't recall if I asked Emily specifically.
18 I assumed she was coming.

19 MS. VESELY: We've been going about a little
20 over an hour. Do you mind if we take a break?

21 MR. HAYDEN: Yeah, just like five more
22 minutes.

23 MS. VESELY: Go ahead.

24 MR. HAYDEN: This is almost done.

25 MS. VESELY: Wrap something up here, and

1 that's fine.

2 BY MR. HAYDEN:

3 Q. Did you ask Ms. Elwyn to reach out to Preserve
4 the 'Burg's network to help bring people to the CPPC
5 hearing?

6 A. Preserve the 'Burg does that, and I would have
7 asked her to make sure she put something to say that,
8 yes.

9 Q. Did you ask her for the same support for the
10 city council hearing?

11 A. I'm sure that I did.

12 Q. So would it be fair to say that you asked
13 Preserve the 'Burg generally to provide their support of
14 the Doc Webb application?

15 MR. ROSS: Object to the form of the question.

16 MS. VESELY: Same objection.

17 THE WITNESS: I assumed Preserve the 'Burg
18 would be doing that. And I undoubtedly said, Could
19 you make sure that you help support it?

20 BY MR. HAYDEN:

21 Q. So is that a "yes"?

22 MS. VESELY: Objection.

23 THE WITNESS: Repeat the question, please.

24 BY MR. HAYDEN:

25 Q. Did you ask Preserve the 'Burg to help spread

1 the word and to spread support for the application for
2 the Doc Webb house?

3 A. Preserve the 'Burg was already doing that. I
4 asked them to make sure -- they were definitely doing
5 it, so I was not the initiator of their support.

6 Q. So independently Preserve the 'Burg was
7 already supporting the application?

8 A. Yes.

9 Q. And were they supporting that prior to the
10 application being filed?

11 A. I have no idea what they were doing prior to
12 the application being filed with the Doc Webb estate.

13 MR. HAYDEN: Okay. We can take a break.

14 MS. VESELY: Thank you.

15 (A recess was taken.)

16 BY MR. HAYDEN:

17 Q. I would like to talk a moment about Karen and
18 Merrell King. Do you know who Karen and Merrell King
19 are?

20 A. Yes.

21 Q. How long have you known the Kings?

22 A. I don't know the Kings at all.

23 Q. How long have you been neighbors with the
24 Kings?

25 A. We have our -- our property backs up to the

1 back of their property from 35th to 36th, I guess, since
2 we moved in.

3 Q. So over that approximate 15-year history of
4 living there, you never got to know the Kings
5 whatsoever?

6 A. No. I never even knew what they looked like
7 until they walked into the hearing the first day.

8 Q. Did you have any general knowledge of their
9 age?

10 A. I knew they were older than we were, because I
11 believe they have a daughter or had a daughter, and she
12 was older than my children were.

13 Q. Now, you were in the deposition a few months
14 back of Merrell and Karen King here at the Trenam law
15 firm, weren't you?

16 A. I was.

17 Q. And you heard the Kings mention that they had
18 spoken with your husband, Derek Hess, before about
19 Mr. Hess potentially wanting to buy a portion of their
20 property.

21 Do you remember that?

22 A. I recall that part of the deposition, yes.

23 Q. Do you remember if Derek ever had that
24 conversation with the Kings?

25 A. You would have to ask Derek about his exact

1 conversation with Mr. King for the specifics. I don't
2 know the specifics of that conversation. I'm very
3 sorry.

4 Q. Did you ever share in Derek's interest to
5 purchase a portion of the Kings' property?

6 A. I shared in the interest to preserve that part
7 of the lot that backed up on to our pool so that we
8 could keep it full of trees and undeveloped.

9 Q. And by preserving that portion of the
10 property, do you mean preserving some type of structure,
11 or is it just trees?

12 A. I believe it's just trees and a derelict
13 greenhouse.

14 Q. How big is this greenhouse?

15 A. I have no idea how big the greenhouse is.
16 There's a lot of foliage between our house and the
17 Kings' property.

18 Q. Do you know if your husband ever formally
19 offered to buy that portion of the property?

20 A. He did not.

21 Q. Do you remember approximately what year that
22 was?

23 A. I have no idea. Sorry.

24 Q. Do you remember when you first -- strike that.
25 When did you first associate the Kings' home

1 with Doc Webb?

2 A. Not until right before filing the application.

3 Q. So you hadn't known for decades that that was
4 a home that was associated with Doc Webb?

5 A. No.

6 Q. So what was the approximate time frame, then,
7 that you first noticed that the Kings' home was
8 associated with Doc Webb?

9 A. I believe -- I don't know the specific time
10 frame and I apologize -- that it was after the 810 house
11 had been demolished, and that was about 2017, 2018.

12 Q. Did you try to file an application for the
13 historic designation of the Kings' home during the time
14 period that the 810 property was demolished?

15 A. I'm sorry, I don't understand the question.

16 MR. ROSS: Object to the form of the question.

17 BY MR. HAYDEN:

18 Q. Did you try to file a local landmark
19 designation application for the Kings' house back in
20 2017 when the 810 property was demolished?

21 A. No.

22 Q. Why not?

23 A. Because I didn't.

24 Q. But you mentioned that was the first time that
25 you realized that the property was associated with Doc

1 Webb, right?

2 MS. VESELY: Form objection.

3 THE WITNESS: Yes.

4 BY MR. HAYDEN:

5 Q. So when you first realized that the Kings'
6 home was associated with Doc Webb, you didn't file an
7 application for the local landmark designation of the
8 Kings' home, right?

9 A. I had a senior in high school.

10 Q. If you could answer the question.

11 A. I'm answering the question. I had a senior in
12 high school. I focused on him and his college
13 application, not much else.

14 Q. So the answer is no?

15 A. Repeat the question.

16 Q. In 2017, when you first noticed that the
17 Doc Webb home -- sorry. Strike that.

18 In 2017, when you first realized that the
19 Kings' home was associated with Doc Webb, you did not
20 file a local landmark designation application, correct?

21 A. No, I did not.

22 Q. Instead, you waited until November of 2018 to
23 file an application, correct?

24 MS. VESELY: Excuse me. Form objection.

25 THE WITNESS: I filed an application in early

1 November 2018.

2 (Exhibit No. 1 was marked for identification.)

3 BY MR. HAYDEN:

4 Q. Okay. I would like to hand you what I have
5 marked as Exhibit 1. I would like you to flip through
6 the exhibit. And then once you've had a chance to read
7 through it, just look up and let me know.

8 A. I'm well versed in this exhibit.

9 Q. Okay. Do you want to flip through it and make
10 sure that all pages are there? I want to make sure that
11 this is a correct copy.

12 MR. ROSS: For the record, the exhibit is
13 Bates stamped Dowling --

14 MS. VESELY: 733.

15 MR. ROSS: -- a bunch of zeroes, 733 --

16 MR. HAYDEN: And it ends at 756.

17 MR. ROSS: -- through 756.

18 THE WITNESS: It appears to be complete.

19 BY MR. HAYDEN:

20 Q. Now, looking at the face of this Exhibit 1, is
21 this your handwriting that appears on this document?

22 A. It is.

23 Q. Okay. And you see at the top right there it's
24 the City of St. Petersburg and what looks to be a red
25 date stamp.

1 What's the date of that?

2 A. November 6th, 2018.

3 Q. Was that the date that you filed this
4 application with the City of St. Petersburg?

5 A. I believe that it is.

6 Q. Okay. And at portion 3 on the first page, it
7 says "nomination prepared by." You have -- what's
8 listed there? Is that your name, Anne Dowling?
9 Correct?

10 A. It is.

11 Q. And under "organization," what do you have
12 listed?

13 A. Allendale Terrace Neighbors United.

14 Q. And what's that that follows after that slash?

15 A. "Issues to Action."

16 Q. What's "Issues to Action"?

17 A. A club that my children were involved in in
18 Shorecrest.

19 Q. Is that an entity that's formed with Sunbiz
20 or --

21 A. No.

22 Q. It's a school club at Shorecrest, then?

23 A. It is.

24 Q. I would like you to flip to -- it's Bates
25 stamped at the bottom -- Dowling 737. I believe it's

1 page 5 of Exhibit 1. Let me know when you're there.

2 A. I'm there.

3 Q. Okay. Do you see the section that starts with
4 the letter "B"? And the language reads, "Is there an
5 existing contract for sale of subject property?" Do you
6 see that?

7 A. I do see that.

8 Q. Okay. And do you see the box that's marked
9 "no"?

10 A. I do see that.

11 Q. Okay. Did you place the X within that box?

12 A. I did place the X within that box.

13 Q. Okay. And then the signature at the bottom of
14 page 737, Bates stamped 737, is that your signature?

15 A. That is my signature.

16 Q. Okay. And going back to the first page of
17 Exhibit 1 that's marked Dowling 733, do you see also
18 under Section No. 3 that there's a signature? Is that
19 your signature that appears there as well?

20 A. It is.

21 Q. Okay. Now, is this, then, a true and correct
22 copy of the application that you filed to designate the
23 Kings' home at 774 36th Avenue North as a landmark
24 historic designation with the City of St. Petersburg?

25 A. It appears to be, yes.

1 (Exhibit No. 2 was marked for identification.)

2 BY MR. HAYDEN:

3 Q. I would like to hand you what I have marked as
4 Exhibit 2. I would like you to look through that
5 document and let me know when you've had a chance to
6 review it.

7 A. I have reviewed it.

8 Q. What is this document?

9 A. It is an electronic articles of incorporation
10 for Allendale Terrace Neighbors United, Inc.

11 Q. And at the top right, what is the date that
12 this was filed with the secretary of state?

13 A. November 14th, 2018.

14 Q. Now, Allendale Terrace Neighbors United, Inc.,
15 is this an organization that you formed to act as a
16 neighborhood association for Allendale Terrace Neighbors
17 United?

18 A. It's an organization formed to be a
19 neighborhood organization for Allendale Terrace, the
20 official name of the neighborhood.

21 Q. And did you intend for this to be a voluntary
22 homeowners association?

23 A. I intended it to be a homeowners association.

24 Q. A mandatory homeowners association?

25 A. I don't know the difference. I mean, I know

1 the difference between voluntary and mandatory. I just
2 intended it to be a homeowners association.

3 Q. At the time of filing in November -- on
4 November 14th of 2018, who were the neighbors -- sorry.

5 Who were the members that were part of this
6 organization?

7 A. My husband, Derek Hess; my son, William Hess;
8 myself. And that's it.

9 Q. Were there any neighbors within Allendale
10 Terrace that were also members?

11 A. Not on the date of filing, no.

12 Q. What about subsequent to the date of filing?

13 A. That's a long answer.

14 Q. Are there other members that are part of
15 Allendale Terrace Neighbors United, Inc., as we sit here
16 today?

17 A. No. We were sued. I wouldn't subject anybody
18 to that.

19 Q. Between November 14th, 2018, and March of
20 2019, were any additional members added to Allendale
21 Terrace Neighbors United, Inc.?

22 A. I was in a training for CONA, the neighborhood
23 association, so there were none added as I was learning
24 how to be a neighborhood association president.

25 Q. So is the answer no, there were no additional

1 members added between November 14th, 2018, and March of
2 2019?

3 MS. VESELY: Objection. Asked and answered.

4 THE WITNESS: I don't believe that there were.

5 BY MR. HAYDEN:

6 Q. Is it that you don't know, or is the answer
7 no?

8 A. I don't believe there were. I'm happy to
9 check and see between those dates if there was anybody
10 who was added.

11 Q. So you don't know?

12 MS. VESELY: Objection. Asked and answered.

13 THE WITNESS: I don't know.

14 BY MR. HAYDEN:

15 Q. Okay. Thank you. I'm just trying to get a
16 clear record. Do you not know?

17 A. I don't know.

18 Q. All right. Thank you.

19 Between November 14th, 2018, and March of 2019
20 were there any community activities that Allendale
21 Terrace Neighbors United engaged in?

22 A. As I said, I was going through training with
23 CONA, and this is exactly what they teach you how to do.
24 I was learning how to be an advocate and the president
25 of a neighborhood association, which was new to me. I

1 graduated from CONA, I believe, in late February 2018 --
2 or 2019.

3 Q. Okay. So for simplification purposes, is that
4 a "no"?

5 A. Repeat the question, please.

6 Q. Between November 14th, 2018, and March of 2019
7 was Allendale Terrace Neighbors United, Inc., involved
8 in any neighborhood activities?

9 A. I participated as president in a tremendous
10 number of activities through the CONA organization.

11 Q. Okay. Can you describe some of those
12 activities?

13 A. Sure. We met with Mayor Kriseman. We met
14 with the police chief. We met with every head of the
15 city, of every department. We met with other
16 neighborhood associations. I attended CONA meetings. I
17 attended other neighborhood association meetings.

18 Q. Anything else?

19 A. I met weekly with my group for a 12- to
20 16-week period. And there's a full binder of stuff you
21 can get from the head of CONA, and she can walk you
22 through it.

23 Q. Okay. You mentioned that you met with your
24 group. Is that the CONA group or -- let's just
25 abbreviate this -- the Allendale Terrace, Inc.? Which

1 was it? Did you meet with the CONA group, or did you
2 meet with the Allendale Terrace, Inc.?

3 A. I met with CONA as a representative of
4 Allendale Terrace Neighbors United.

5 Q. Okay. And, earlier, when you were describing
6 some of the activities that were participated in, you
7 said "we." Was there anyone else that attended those
8 CONA activities besides you?

9 A. There were over 40 people.

10 Q. Forty other individuals that were
11 representatives --

12 A. Who were all going through the same training.

13 Q. I want to be more specific.

14 A. I'm the only representative of Allendale
15 Terrace Neighbors United at CONA.

16 Q. Thank you.

17 So nobody else from Allendale --

18 A. William Hess --

19 THE REPORTER: I just need one at time, if we
20 could.

21 BY MR. HAYDEN:

22 Q. So there were no other members from Allendale
23 Terrace Neighbors United, Inc., that participated in any
24 of the CONA programs?

25 A. My son, William Hess, did, yes.

1 Q. Anyone else?

2 A. Not that I'm aware of.

3 Q. So I would like to go -- if you look at page 2
4 of Exhibit 2, Bates marked as 759 under Article 7, it
5 says under "the initial officers and/or directors of the
6 corporation is/are," starting with William R. Hess as
7 the title. There's a "P." Is that for president?

8 A. Yes.

9 Q. What was William's role as president? What
10 did that entail?

11 A. He didn't participate much as he was in
12 school, and I became president.

13 Q. When did you become president?

14 A. I don't know. I think we changed -- we had to
15 update the articles. I don't recall the exact date.

16 Q. Is that something that was done electronically
17 on Sunbiz?

18 A. I believe so.

19 Q. Is that something that Jessica Ehrlich did on
20 your behalf?

21 A. No.

22 Q. Did you do that on your own?

23 A. I did.

24 Q. And what was the reason why you changed
25 William to -- or, I'm sorry. Strike that.

1 What was the reason that you were named
2 president?

3 A. So that I could be active and go through the
4 CONA leadership training.

5 Q. Down below you see Derek Hess, title, VP. Is
6 that vice president?

7 A. That is.

8 Q. And what was Mr. Hess's role as vice
9 president?

10 A. Dr. Hess did nothing.

11 Q. Dr. Hess. I apologize.

12 So his role was vice president, and he did
13 nothing?

14 A. No. We were inactive until I went through the
15 training.

16 Q. Explain that inactive. You were inactive in
17 terms of you weren't an active corporation or --

18 A. We were an active corporation. We didn't do
19 much until I went through the training. We had done
20 stuff prior.

21 Q. What type of stuff did you do?

22 A. Provided -- I helped provide a voice for my
23 neighborhood.

24 Q. Where was your voice heard?

25 A. Hopefully with city council on various issues.

1 Q. Did you appear at various city council
2 meetings on behalf of Allendale Terrace Neighbors
3 United, Inc.?

4 A. Following the corporation I did, yes.

5 Q. Other than the city council hearing for the
6 designation --

7 A. I don't know the dates.

8 MS. VESELY: Let him finish his question.

9 BY MR. HAYDEN:

10 Q. If I may.

11 A. Sorry.

12 MS. VESELY: That's okay.

13 BY MR. HAYDEN:

14 Q. Did you appear at other St. Petersburg City
15 Council meetings other than for the designation of the
16 Kings' home on behalf of Allendale Terrace Neighbors
17 United, Inc.?

18 A. I appeared on behalf of myself at those
19 meetings.

20 Q. But you mentioned a moment ago that your voice
21 as a proponent for Allendale Terrace Neighbors United,
22 Inc., was heard by city council?

23 A. Following incorporation.

24 Q. Okay. I'm not trying to trip you up here.
25 I'm just trying to understand.

1 Did you represent Allendale Terrace Neighbors
2 United, Inc.?

3 A. I represented Allendale Terrace Neighbors
4 United, Inc., after incorporation.

5 Q. And did you represent them before city
6 council?

7 A. If I appeared in a city council hearing, then
8 it was either myself or on behalf of Allendale Terrace
9 Neighbors United, Inc.

10 Q. Approximately how many times did you appear on
11 behalf of --

12 A. I don't know. That would be public record.

13 Q. Was it more than once?

14 A. I believe it was more than once.

15 Q. Was it more than five times?

16 A. I don't know. You will have to pull the
17 public records. I'm sorry.

18 Q. So was it less than five times?

19 A. I don't know.

20 MS. VESELY: Form.

21 THE WITNESS: You will have to pull the public
22 records. I'm very sorry.

23 BY MR. HAYDEN:

24 Q. How many membership meetings has Allendale
25 Terrace Neighbors United, Inc., held since

1 November 14th, 2018?

2 A. None. We were in training or we were sued.

3 Q. So would it be fair to say that Allendale
4 Terrace Neighbors United, Inc., does not have any
5 meeting minutes?

6 A. It does not have any meeting minutes.

7 Q. Now, going back to page 1 of Exhibit 2, under
8 Article 3, it says to address issues affecting Allendale
9 Terrace neighborhood.

10 A. Yes.

11 Q. What issues were you intending to address?

12 A. All sorts of issues.

13 Q. Can you elaborate?

14 A. Everything traditionally affecting a
15 neighborhood: crime, code compliance, neighborly
16 concerns, park maintenance.

17 Q. Was property development one of those
18 concerns?

19 MS. VESELY: Form.

20 THE WITNESS: Property development as in?

21 BY MR. HAYDEN:

22 Q. Development of new homes.

23 A. Development of new homes.

24 Q. Was that a concern that Allendale Terrace
25 Neighbors United was to address?

1 A. The historic nature of the neighborhood was a
2 concern.

3 Q. So to answer my question, was one of the
4 issues that Allendale Terrace Neighbors United, Inc.,
5 was formed to address was the development of new
6 residential properties within Allendale Terrace?

7 A. It was development in general.

8 Q. Including new residential construction, right?

9 A. Including new residential construction, yes.

10 Q. And what was Allendale Terrace Neighbors
11 United, Inc.'s, position on new residential construction
12 within Allendale Terrace?

13 A. My position is that it was -- progress is
14 good, but that affecting the character of the
15 neighborhood to the detriment of the neighborhood is
16 bad.

17 Q. And what types of development did Allendale
18 Terrace Neighbors United, Inc., consider to be bad?

19 MS. VESELY: Asked and answered. Form.

20 THE WITNESS: The destruction of historic
21 properties.

22 BY MR. HAYDEN:

23 Q. So was it your position and the position of
24 Allendale Terrace Neighbors United, Inc., that the
25 destruction of any historic properties was bad?

1 MS. VESELY: Form.

2 THE WITNESS: I'm not a fan of destroying
3 historic properties.

4 BY MR. HAYDEN:

5 Q. Now, at the time of filing in November 14th,
6 2018, had any properties within Allendale Terrace that
7 were designated as historic with the
8 City of St. Petersburg been destroyed?

9 A. I'm not aware of any that were designated as
10 historic that were destroyed. There were many that were
11 destroyed.

12 Q. But they weren't designated as historic,
13 correct?

14 A. They were not designated as historic, that I
15 am aware of.

16 MR. HAYDEN: Okay. All right. I think now is
17 probably a good breaking point.

18 MS. VESELY: Okay.

19 (A lunch recess was taken at 11:48 a.m.)
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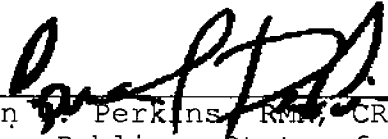
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CERTIFICATE OF OATH

STATE OF FLORIDA
COUNTY OF HILLSBOROUGH

I, the undersigned authority, certify that
ANNE C. E. DOWLING personally appeared before me and
was duly sworn.

WITNESS my hand and official seal this 9th day of
December, 2019.



Aaron W. Perkins, RM, CRR, CRC
Notary Public - State of Florida
My Commission Expires: 3/1/2020
Commission No. FF966216



REPORTER'S CERTIFICATE

STATE OF FLORIDA
COUNTY OF HILLSBOROUGH

I, Aaron T. Perkins, Registered Merit Reporter and Certified Realtime Reporter, certify that I was authorized to and did stenographically report the deposition of ANNE C. E. DOWLING; that a review of the transcript was requested; and that the transcript is a true and complete record of my stenographic notes.

I further certify that I am not a relative, employee, attorney, or counsel of any of the parties, nor am I a relative or employee of any of the parties' attorney or counsel connected with the action, nor am I financially interested in the action.

Dated this 9th day of December 2019.



Aaron T. Perkins, RMR, CRR, CRC

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SIGNATURE PAGE

Please attach to the deposition of ANNE C. E. DOWLING taken on December 3, 2019, in the case of MERRILL KING and KAREN KING and SAINT PETERSBURG PRESERVATION, INC., d/b/a PRESERVE THE 'BURG, ALLENDALE TERRACE NEIGHBORS UNITED, INC., ANNE DOWLING, DEREK HESS, and PETER BELMONT.

PAGE LINE CORRECTION AND REASON THEREFOR

I HAVE READ THE FOREGOING PAGES AND, EXCEPT FOR ANY CORRECTIONS OR AMENDMENTS INDICATED ABOVE, I HEREBY SUBSCRIBE TO THE ACCURACY OF THIS TRANSCRIPT.

ANNE C. E. DOWLING

DATE

WITNESS TO SIGNATURE

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18-9030010



City of St. Petersburg
Division of Urban Design
and Historic Preservation

Local Landmark Designation Application

Type of property nominated (for staff use only):
 building structure site object
 historic district multiple resource

CITY OF ST. PETERSBURG
NOV 06 2018
PLANNING & ECONOMIC DEVELOPMENT

1. NAME AND LOCATION OF PROPERTY

historic name Allendale Terrace - Doc Webb Estate
other names/site number _____
address 774 36th Ave N, St. Pete, FL 33704-1246
historic address _____

2. PROPERTY OWNER(S) NAME AND ADDRESS

name Merrill C. King and Karen King
street and number 774 36th Ave N
city or town St. Petersburg state FL zip code 33704
phone number (h) _____ (w) _____ e-mail _____

3. NOMINATION PREPARED BY

name/title Anne Dowling
organization Allendale Terrace Neighbors United / Issues to Action
street and number 803 35th Ave N
city or town St. Petersburg state FL zip code 33704-1246
phone number (h) 727-366-1207 (w) _____ e-mail _____
date prepared 11/6 signature [Signature]

4. BOUNDARY DESCRIPTION AND JUSTIFICATION

Describe boundary line encompassing all man-made and natural resources to be included in designation (general legal description or survey). Attach map delimiting proposed boundary. (Use continuation sheet if necessary)
07-31-17-00522-002-0110 - Lots 11-14

5. GEOGRAPHIC DATA

acreage of property .56 acres - ?
property identification number 07-31-17-00522-002-00-Lot 11-14



DOWLING_000000733

Doc Webb Estate - Alondale Farm
Name of Property

STATEMENT OF SIGNIFICANCE

Criteria for Significance
(mark one or more boxes for the appropriate criteria)

Areas of Significance
(see Attachment B for detailed list of categories)

- Its value is a significant reminder of the cultural or archaeological heritage of the City, state, or nation.
- Its location is the site of a significant local, state, or national event.
- It is identified with a person or persons who significantly contributed to the development of the City, state, or nation.
- It is identified as the work of a master builder, designer, or architect whose work has influenced the development of the City, state, or nation.
- Its value as a building is recognized for the quality of its architecture, and it retains sufficient elements showing its architectural significance.
- It has distinguishing characteristics of an architectural style valuable for the study of a period, method of construction, or use of indigenous materials.
- Its character is a geographically definable area possessing a significant concentration, or continuity or sites, buildings, objects or structures united in past events or aesthetically by plan or physical development.
- Its character is an established and geographically definable neighborhood, united in culture, architectural style or physical plan and development.
- It has contributed, or is likely to contribute, information important to the prehistory or history of the City, state, or nation.

Doc Webb - Cabin
House is architectural of interest
History of City of Okla

Period of Significance

Significant Dates (date constructed & altered)

Significant Person(s)

Cultural Affiliation/Historic Period

Builder

Architect

Narrative Statement of Significance

(Explain the significance of the property as it relates to the above criterial and information on one or more continuation sheets. Include biographical data on significant person(s), builder and architect, if known.)

10. MAJOR BIBLIOGRAPHICAL REFERENCES

(Cite the books, articles, and other sources used in preparing this form on one or more continuation sheets.)



Planning Department
310 Court St., 3rd Floor
Clearwater, FL 33758
(727) 484-8200
Fax: (727) 484-8201



**Local Landmark/Landmark Site
Designation Application**

- City of St. Pete, FL
Div. of Urban Design and
Historic Pres.

Date: 11/5/2018

Applicant

Name/Title Anne C. Dowling
Organization Allendale Terrace Neighbors United / Issues + Actm
Address 803 35th Ave N
City St. Petersburg State FL Zip Code 33704
Phone 727-366-0207
Email A.C.DOLEKE@OL.COM

Property/District

Historic Name Allendale Terrace
Property Address 774 36th AVE N
City St. Petersburg, FL State FL Zip Code 33704-1246
Tax Parcel Identification Number 07-31-17-00522-002-0110

Lots 11-14

Property Owner(s)

Name Merrill C. King II, Karen King
Address 774 36th Ave N
City St. Petersburg State FL Zip Code 33704-1246
Phone _____
Email _____



Planning Department
310 Court St., First Floor
Clearwater, FL 33756
(727) 484-8200
Fax: (727) 484-8201

Criteria for Designation

Please check all applicable boxes if the resource(s) you are submitting for designation is/are:

- Associated with distinctive elements of the cultural, social, political, economic, scientific, religious, prehistoric, or architectural history that have contributed to the pattern of history in the community, the county, southwestern Florida, the state or nation.
- Has yielded, or are likely to yield, information on history or prehistory.
- Listed or have been determined eligible for listing in the National Register of Historic Places.
- Associated with the life or activities of a person of importance in local, state, or national history.
- Is the site of a historic event with a significant effect upon the county, state or nation.
- Exemplary of the historical, political, cultural, economic, or social trends of the community in history..
- Associated in a significant way with a past or continuing institution which has contributed substantially to the life of the community.
- Embodies the distinctive characteristics of a type, period, style or method of construction or are the work of a master; or that possess high artistic value; or that represent a distinguishable entity whose components may lack individual distinction.
- It portrays the environment in an era of history characterized by one or more distinctive design element or architectural styles;
- It embodies the characteristics of an architectural style, period or method of construction.
- It is a historic or outstanding work of a prominent architect, designer, or landscape architect.
- It contains elements of design, detail, material, or craftsmanship which are of outstanding quality or which represented, in its time, a significant innovation, adaptation or response to the southwest Florida environment.

Incentives

Are any historic preservation incentives being sought in association with this application (e.g., historic property tax exemption, variance from building code/zoning)? If so, please elaborate below.

None



Planning Department
310 Court St., First Floor
Clearwater, FL 33756
(727) 468-8200
Fax: (727) 464-8201

Disclosure Information (This information must be supplied pursuant to County Ordinance No. 74-15)

A. If the owner is a corporation, partnership, or trust, list all persons (i.e. partners, corporate officers, all members of the trust) who are a party to such as well as anyone who may have a beneficial interest in the property which would be affected by any ruling on their application.

N/A

Specify interest held:

B. Is there an existing contract for sale of subject property: Yes No

If yes, list names of all parties to the contract including all partners, corporate officers, and members of any trust:

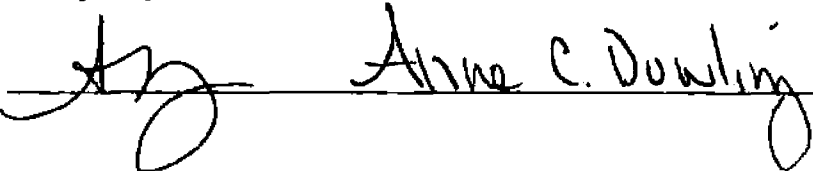
Is contract conditional or absolute? Conditional Absolute

C. Are there any options to purchase on subject property? Yes No

If so, list names of all parties to option including all partners, corporate officers and members of any trust:

Signature of Property Owner

I hereby certify that all information is correct:


Anne C. Dowling



Planning Department
310 Court St., First Floor
Clearwater, FL 33756
(727) 464-8200
Fax: (727) 464-8201

Function or Use

Historic Function:

Home of the legendary "Doc Webb" - site of significant cultural importance to St. Petersburg.

Current Function:

Single-family home

Proposed Use:

Single-family home

Written Description of Proposed Landmark or Landmark Site

As an attachment, please provide a narrative summary explaining the significance of the property as it relates to the above criteria for designation. The narrative should explain the archaeological, historical, architectural, or cultural significance of the proposed landmark, as well as the period of significance, date constructed, biographical data on significant persons who may have resided in the structure, the cultural affiliation/historic period, who the builder and architect were, etc., if known/applicable.)

Additional Evidence and Supporting Materials

Please provide the following, as attachments to this application:

- (a) Photographs which are inclusive of all elevations, architectural details and significant exterior features.
- (b) Copy of Florida Master Site File, if one exists.
- (c) Survey, or legal description, of property/structure.

On applications for the designation of historic districts, the applicant shall also submit:

- (d) A written description of the boundaries of the district; and - In Green Beach Article on Altendale.
- (e) List of contributing resources. Cade B. Allen, A Life Remembered 2007

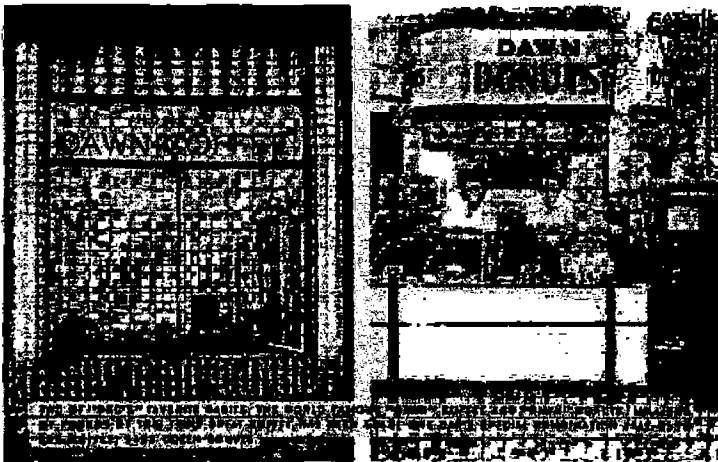
Note: If this application is for designation of a historic district, please refer to the additional requirements in Sec. 146-8 (b) and (c) of the Pinellas County code.

Searching for Webb's City

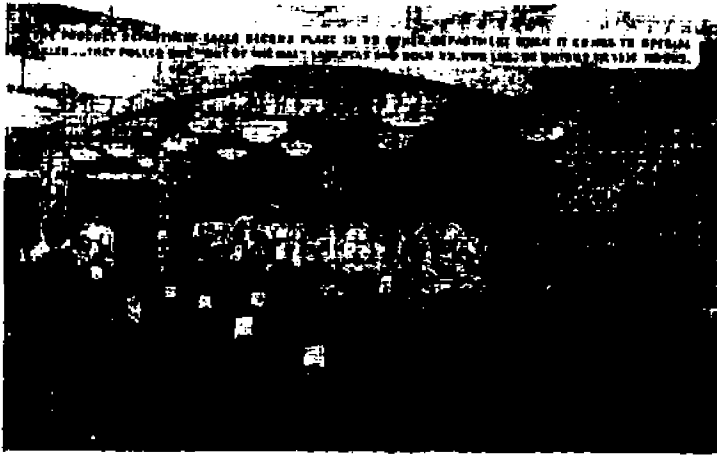
BIG T



I grew up hearing about Webb's City in St. Petersburg, but I never had a chance to visit that famed shopper's paradise. The so-called "World's Most Unusual Drug Store" had already closed in 1979. But during its heyday, Webb's City was renowned (and attacked) for its "stack it high and sell it cheap" philosophy and its fearlessly tacky gimmicks that included dancing chickens, mermaids, and dollar bill-sales (95 cents per buck). Webb's City was a southern tradition.



Launched as a out-rate drug store in 1925, Webb's City grew fast during the Depression thanks to "Doc" Webb's willingness to do anything to attract customers. He was particularly beloved for his two-cent breakfasts in those early days, when anyone who could scrounge up some pennies got an egg, a bacon strip, and a side of buttered toast, along with a cup of coffee and a glass of orange juice. Thus fortified, anyone could go shopping at Webb's.

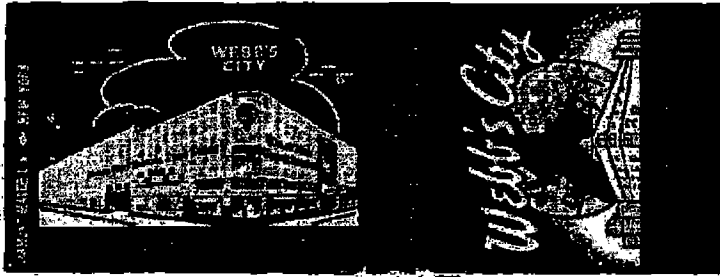


Webb fashioned himself as a man of the little people, selling goods below prices set by their producers and fighting lawsuits that challenged his cut-rate tactics. In *St. Petersburg and the Florida Dream: 1888-1950*, Raymond Arsenault quotes Webb's philosophy, "I don't care a damn about money . . . I wanted customers."

Are You Parked on On A Webb City Lot?

**A \$2.00 PARKING FEE WILL BE
COLLECTED . . . If You Trade Else-
where Than WEBB CITY STORES**

At its zenith, Webb's City included 77 stores covering seven city blocks, selling groceries, hardware, surgical supplies, electronics, clothes and, of course, drugs. Webb's City offered a combination of history, hucksterism, and value that can only now be experienced, I suppose, in South Dakota's Wall Drug. I'd love to learn more about Webb's City, so if you ever visited "Doc" Webb's beloved xanadu of values, please leave a comment.



Learn More

- *Crazed Fanboy*, A profile of J.E. "Doc" Webb - - Florida Folk Hero and Entrepreneur Extraordinaire
- *St. Petersburg Times*, Follow the dancing chicken



House

web house

Clipped By:

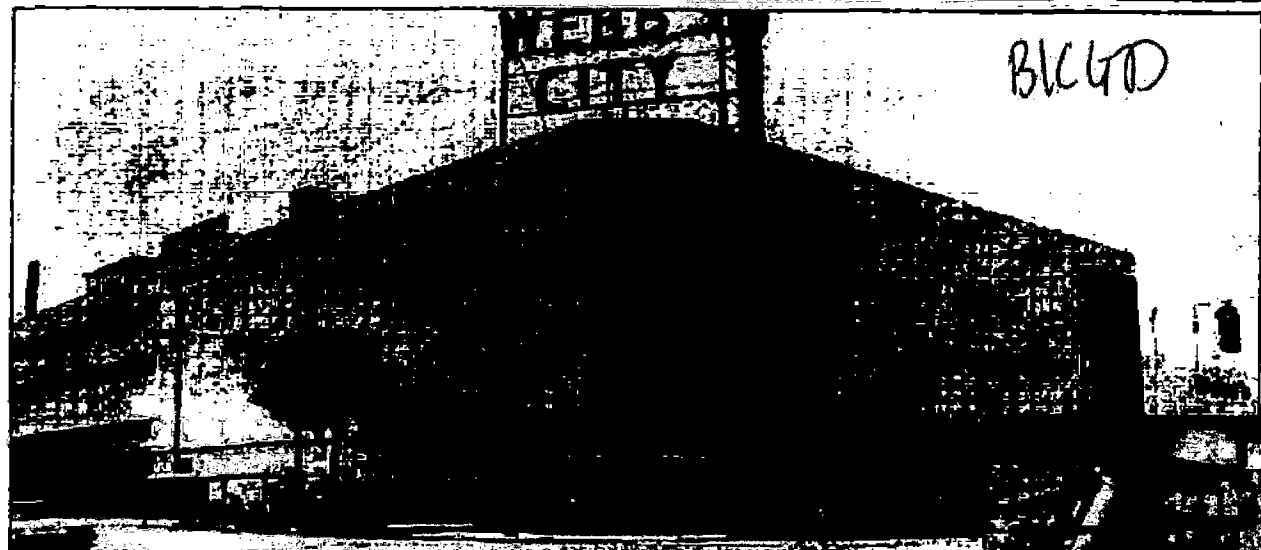


eshwyl
Tue, Nov 6, 2018

DOWNTOWN



including Old Northeast and Shell Isle



ALL ROADS LEAD TO WEBB'S CITY

Ask any resident who lived in St. Petersburg prior to the Nixon Administration about their favorite place to shop, and you will most likely be inundated with fond memories and grand tales of one place: Webb's City and its charismatic owner, James Earl Webb. What began as a 17-by-28 foot storefront, on the "wrong side of the tracks" in 1925, rapidly ballooned into a monolithic empire which took up nearly 10 city blocks thanks to the vision on James Webb. "I don't give a damn about money, I want customers," he once declared in an interview. And did he ever get them – up to 60,000 of them daily.

A natural born salesman, James Webb hawked newspapers at the age of 9 in 1905 for Nashville's largest daily, The Tennessean. Soon he was managing a crew of 14 other newsies and was making a whopping \$8 monthly. Always wanting to offer the customer more, Webb began selling hot German bread to his customers three days a week. His family had a garden and a cow, so he started selling them vegetables and milk, too. Not one to sit still, the youngster mowed lawns and sold lemonade at a curbside stand. He took any unsold ads and made sherbet for the next day's customers. At the ripe age of 12, Webb decided he was too busy for school and dropped out in the 5th grade. That same year, the family relocated to Knoxville where Webb promptly found work setting pins at a bowling alley, working the soda fountain and helping around a local pharmacy, Economy Drug Company.

By age 20, Webb had married and become manager and part owner of the drug store. It was here that James Webb earned a lifelong nickname as "Doc." That moniker fit the slight 5 foot 5 man, as he was always testing and marketing quick-cure remedies and elixirs. Without license requirements or FDA interference, pharmacists like Doc took advantage of the lack of regulation on patent medicines. Soon he began selling his cure-all "Doc Webb's 608." Primarily intended to treat gonorrhea, the concoction was little more than 70 cents worth of gum acacia and sandlewood. He sold it for \$5.50 a bottle. It sold like hotcakes.

With a growing bank account and desire for a new venture he could call his own, Doc was offered a managing partnership in a friend's St. Petersburg drug store in 1925. For the next year the duo operated the Seaboard Drug store (named for its proximity to the Seaboard rail line). Then came the bust of Florida's land boom.

Webb's partner, most likely nervous about the rapid decline in the economy, sold his portion of the store to Doc and headed back to the hills of Tennessee. Webb immediately began slashing prices to lure in cash-strapped customers. By 1932, Doc had incorporated the store as Webb's Cut Rate Drug Co. and topped \$500,000 in sales. He topped the cool million mark four years later.

Always a fighter for the common man, Doc refused to raise prices and constantly ran advertisements announcing that he would undercut any competitor's price by ten percent. It worked... sometimes too well. ... Continued inside

Story: Nevin D. Sittler, Director of Education and Outreach – St. Petersburg Museum of History. Photos courtesy of St. Petersburg Museum of History and the St. Petersburg Times



Or Current Resident

WEBB'S CITY, Continued

During a 1938 visit to the growing Webb's store, William Bristol - of Bristol-Myers Corp. - became so enraged at Doc's low prices on their products that Doc found himself in court defending his rights to sell his goods at his own chosen price and not that of the manufacturer's suggested price. He won, although he would find himself in court many more times on similar supplier complaints.

Incorporated as Webb's City in 1946, Doc's empire flourished. As customers began requesting more items for purchase, Doc responded. Folks wanted gas and tires, he opened a gas station next door. Folks wanted foodstuffs, he opened a grocery store. Haircuts, sure, you can get one for 50 cents in the barbershop, and get a free ice cream cone afterwards. Doc sold it all. From carpet to cantaloupes to clothes and curtains, customer's came in droves to visit dozens of different stores at Webb's City. And not just for the low prices. Always a salesman (and certainly a showman) Webb provided seemingly endless attractions. Mermaid shows, dancing chickens, bathing beauties and three ringed circuses entertained weary mothers and restless children.

Gimmicks were Doc's forte. You never knew when a sale would happen or where. Want to save 20 percent on women's underwear? On sale at the cigar counter for the



next 5 minutes. He even once sold dollar bills for 95 cents each. Anything to lure the customer in and to keep them shopping. Which they did. Doc even contemptuously proclaimed in a 1949 advertisement that "All roads lead to Webb's City."

The 1950s and 1960s were the golden decades for the "World's Most Unusual Drugstore." In 1970, Webb's City consisted of more than 70 individual stores in seven buildings with a total of 3,000 parking spaces. Sensing a downturn in the economy, and with the arrival of urban shopping malls, Webb sold his 56 percent share of the company to Texas interests in 1974. Perhaps the loss of its greatest promoter was too much for Webb's City, for it went into bankruptcy and closed a few years later. A sad day in St. Pete, for sure.

Webb remained in St. Petersburg with his third wife, Dorothy, passing away in 1982. Although nearly thirty years have elapsed since St. Petersburg's greatest showman left the stage, the memories and mermaids remain in the hearts of thousands. There will never be another Doc Webb.



200 Central Avenue, Suite 280 • RobinsonMed.com • Call 727.339 159

Property
Info

Record Date: 1/1/2014

Book Type:
SUBDIVISIONPLAT - SUBDIVISIONPLAT Book Type

Book / Page: 4/66

Secondary #:

Number of Pages: 1

Doc Type: SUBDIVISIONPLAT
SUBDIVISIONPLAT
Document Type

Grantor: ALLENDALE TERRACE BLKS A-B-

07-31-17-00522-002-0110

Comment Property Record Card

Tax Estimator

Updated November 3, 2018

Email Print

Radius Search

FERMA/WLM

Ownership/Mapping Address-Change Mapping Address KING, MERELL C H KING, KAREN G 774 36TH AVE N ST PETERSBURG FL 33704-1246	Site Address: 774 36TH AVE N ST PETERSBURG
--	--



Property Use: 0110 (Single Family Home)

Total Living: SF: 3,096 Total Gross SF: 4,742 Total Living Units: 1

[click here to hide] Legal Description

ALLENDALE TERRACE BLK 2, LOTS 11 THRU 14

Mortgage Letter		<input checked="" type="checkbox"/> For Homestead Exemption		2019 Parcel Use:
Exemption	2018	2019		Assuming no ownership changes before Jan. 1 Homestead Use Percentage: 100.00% Non-Homestead Use Percentage: 0.00% Classified Agricultural: No
Homestead:	Yes	Yes		
Government:	No	No		
Institutional:	No	No		
Historic:	No	No		

Special Information: Latest Notice of Proposed Property Taxes (TRIM Notice)

Most Recent Recording	Sales Comparison	Census Tract	Elevation Zone	Plot Book/Page
06321/2105	\$1,043,000 Sales Query	121030239001	NON EVAC	4/66

2018 Estimated Value Information

Year	Just/Market Value	Assessed Value / SOH Cap	County Taxable Value	School Taxable Value	Municipal Taxable Value
2018	\$813,954	\$310,965	\$260,965	\$285,965	\$260,965

[click here to hide] Value History as Certified (yellow indicates correction on file)

Year	Homestead Exemption	Just/Market Value	Assessed Value	County Taxable Value	School Taxable Value	Municipal Taxable Value
2017	Yes	\$714,536	\$304,569	\$254,569	\$279,569	\$254,569
2016	Yes	\$581,180	\$298,305	\$248,305	\$273,305	\$248,305
2015	Yes	\$511,272	\$296,231	\$246,231	\$271,231	\$246,231
2014	Yes	\$408,782	\$293,880	\$243,880	\$268,880	\$243,880
2013	Yes	\$384,641	\$289,537	\$239,537	\$264,537	\$239,537
2012	Yes	\$342,354	\$284,697	\$234,697	\$259,697	\$234,697
2011	Yes	\$396,143	\$276,405	\$226,405	\$251,405	\$226,405
2010	Yes	\$524,485	\$272,320	\$222,320	\$247,320	\$222,320
2009	Yes	\$615,840	\$265,161	\$215,161	\$240,161	\$215,161
2008	Yes	\$679,100	\$264,896	\$214,896	\$239,896	\$214,896
2007	Yes	\$795,200	\$257,181	\$232,181	N/A	\$232,181
2006	Yes	\$761,500	\$250,908	\$225,908	N/A	\$225,908
2005	Yes	\$556,800	\$243,600	\$218,600	N/A	\$218,600
2004	Yes	\$415,700	\$236,500	\$211,500	N/A	\$211,500
2003	Yes	\$388,200	\$232,100	\$207,100	N/A	\$207,100
2002	Yes	\$329,500	\$226,700	\$201,700	N/A	\$201,700
2001	Yes	\$247,700	\$223,200	\$198,200	N/A	\$198,200
2000	Yes	\$248,500	\$216,700	\$191,700	N/A	\$191,700
1999	Yes	\$226,000	\$211,000	\$186,000	N/A	\$186,000
1998	Yes	\$224,000	\$207,700	\$182,700	N/A	\$182,700
1997	Yes	\$217,400	\$204,300	\$179,300	N/A	\$179,300
1996	No	\$29,700	\$29,700	\$29,700	N/A	\$29,700

2018 Tax Information

2018 Tax Bill	Tax District: SP
2018 Final Millage Rate	21.7154

Ranked Sales ranked sales history See all transactions

Site Date	Book/Eagt	Price	Q/U	Y/I
	06321/2105	\$275,000	M	

Do not rely on current taxes as an estimate following a change in ownership. A significant change in taxable value may occur after a transfer due to a loss of exemptions, reset of the Save Our Homes or 10% Cap, and/or market conditions. Please use our new Tax Estimator to estimate taxes under new ownership.

Assessment 1 - Will you Benefit?

Check Estimated 3rd Homestead Exemption Benefit

2018 Land Information

Seawall: No

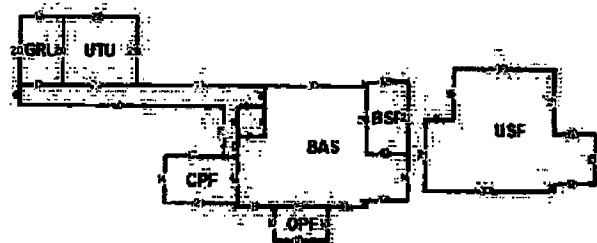
Frontage: None

View: Park/Cons/Pres

Land Use	Land Size	Unit Value	Units	Total Adjustments	Adjusted Value	Method
Single Family (01)	240x138	3800.00	240.0000	0.6693	\$610,584	FF

[click here to hide] 2019 Building 1 Structural Elements Back to Top
 Site Address: 774 36TH AVE N

Building Type: Single Family
 Quality: Excellent
 Foundation: Continuous Footing
 Floor System: Wood
 Exterior Wall: Frame Siding
 Roof Frame: Gable Or Hip
 Roof Cover: Shingle Composition
 Stories: 2
 Living units: 1
 Floor Finish: Carpet/Hardtile/Hardwood
 Interior Finish: Upgrade
 Fixtures: 11
 Year Built: 1925
 Effective Age: 41
 Heating: Central Duct
 Cooling: Cooling (Central)



Compact Property Record Card

Open plot in New Window

Building 1 Sub Area Information

Description	Living Area SF	Gross Area SF
Utility Unfinished	0	440
Lower Story	1,428	1,428
Open Porch	0	652
Garage Unfinished	0	260
Carport	0	294
Base Semi-finished	252	252
Base	1,416	1,416
Total Living SF: 3,096		Total Gross SF: 4,742

[click here to hide] 2019 Extra Features

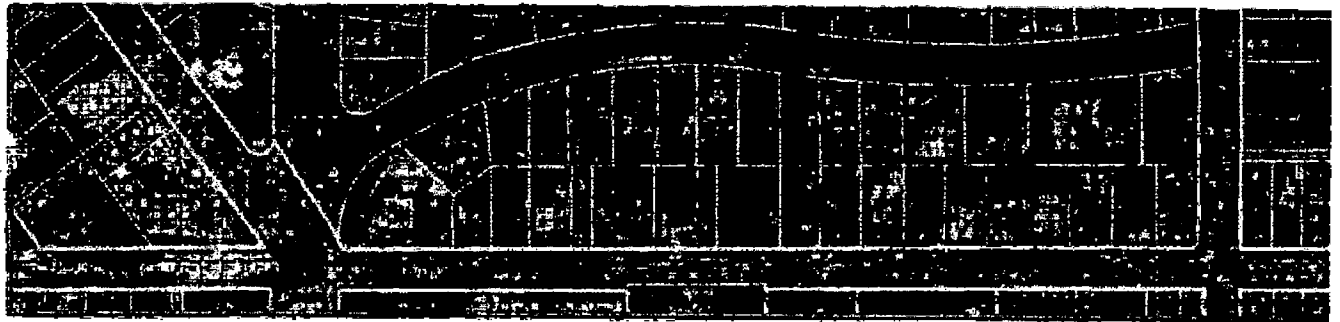
Description	Value/Unit	Units	Total Value as New	Depreciated Value	Year
POOL	\$32,000.00	1.00	\$32,000.00	\$12,800.00	1958
PATIO/DECK	\$9.00	1,760.00	\$15,840.00	\$6,336.00	1958
PORCH	\$22.00	400.00	\$8,800.00	\$3,520.00	1958
SHED	\$25.00	100.00	\$2,500.00	\$1,000.00	1925
GREENHOUSE	-\$60.00	861.00	-\$51,660.00	\$20,664.00	1958

[click here to hide] Permit Data

Permit information is received from the County and Cities. This data may be incomplete and may exclude permits that do not result in field reviews (for example for water heater replacement permits). We are required to list all improvements, which may include unpermitted construction. Any questions regarding permits, or the status of non-permitted improvements, should be directed to the permitting jurisdiction in which the structure is located.

Permit Number	Description	Issue Date	Estimated Value
No Permit Data Found			





[Interactive Map of this record](#)

[Map Legend](#)

[Select Query](#)

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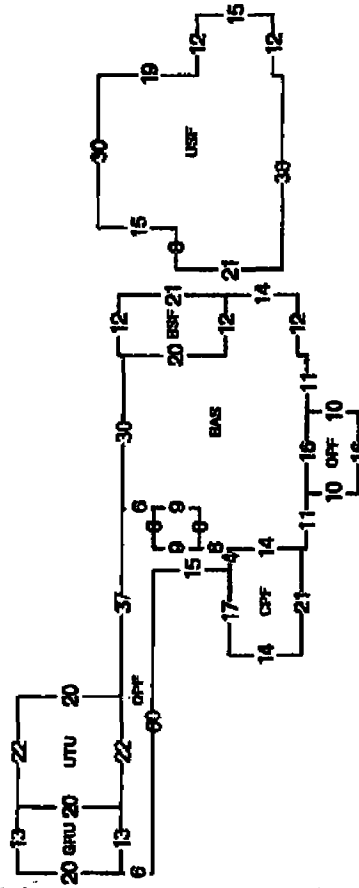


774 36TH AVE N, ST PETERSBURG 33704-

Map 14: 1314.0 1.00 1.00 1.00 AREA ± 13; PER = 24

0110 Single Family Home

QUALITY	RECALLANT	AREA	UNIT VALUE	UNIT PRICE	TOTAL VALUE
FOUNDATION	WOOD	100	3.00		
FLOOR	WOOD	100	12.00		
EXTERIOR	2FRAME -	100	23.00		
ROOF	SHINGLE OR	100	6.00		
FLOOR	SCARPET/HARD	100	10.00		
EXTERIOR	SOPGRADE	100	39.00		
HEATING	CENTRAL	100	5.00		
COOLING	COOLING	100	3.00		
LANDING		2.00			
FIXTURES		11.00			
LAVING UNITS		1.00			
TOTAL FLOOR AREA 1,416 SQ FT					
TOTAL MARKET VALUE 0.0000					
TOTAL MARKET VALUE 0.0000					
TOTAL MARKET VALUE 0.0000					
TOTAL MARKET VALUE 0.0000					
TOTAL MARKET VALUE 0.0000					
TOTAL MARKET VALUE 0.0000					



BUILDING: 1

PREVIOUS LIST MARKET VALUE	714,535
CURRENT LIST MARKET VALUE	613,954
ADJUSTED VALUE	310,965
MARKET CAP BASE YEAR	1994
TAXABLE VALUE	260,965
MARKET	Yes
% INC	100.00
TOT DISTRIBUTIONS VALUE	50,000

2007R WAR, 2013R NC

NO	DESCRIPTION	AREA	UNIT VALUE	UNIT PRICE	TOTAL VALUE	MARKET TYPE	REVIEW DATE	FIELD NUMBER	REVIEW TYPE	OBSEQU
1	1204 GREENHOUSE	100	21			215000 W	4/30/2018	224	Oblique	
2	0703 SHED	100	10							
3	1003 PORCH	1	25							
4	0101 PATIO/DECK	100	0							
5	0203 POOL	100	0							
		130.0	50	65.00						
C 1	01 SINGLE	100	248.00							
		130.0	50	65.00						
		240.00	BT	130	1.03	1.00				
		3,500.00	2,544.30							

ALABAMA STATE DEPARTMENT OF REVENUE
 HAS 2, LOW INVENTORY 14

KING, MARSHALL C II
 774 36TH AVE N
 ST PETERSBURG, FL 33704-1246

2018 07-31-17-00522-002-0110

Page 1 of 2
 PRINTED 8/18/2018
 BY Jaxxstronng

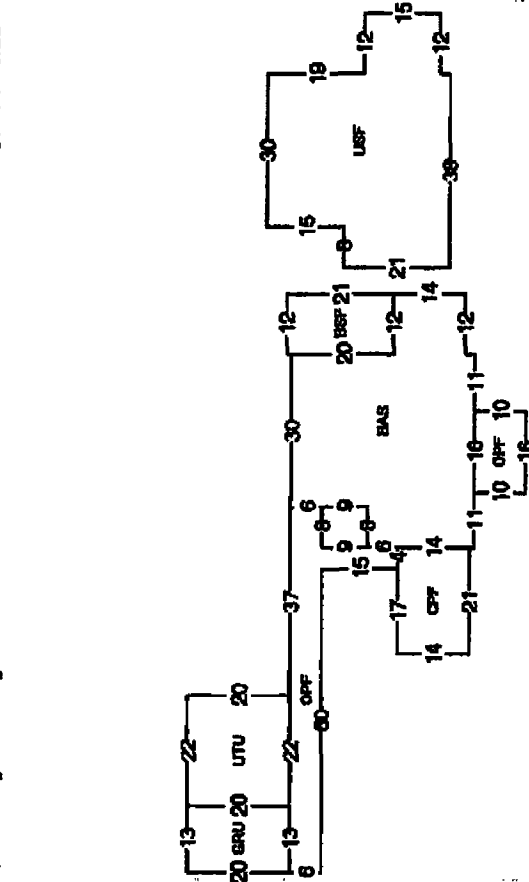
774 36TH AVE N, ST PETERSBURG 33704-

Map Id: 1114.0 1.00 1.00 1.00 AREA = 11; NEB = 14

** VALUE SUBJECT TO CHANGE **

0110 Single Family Home

QUALITY	EXCELLENT
FOURWAY	100 3.00
FLOOR	100 12.0
EXTERIOR	100 23.0
ROOF	100 6.00
POOR	100 3.00
FLOOR	100 10.0
INTERIOR	100 39.0
HEATING	100 5.00
COOLING	100 3.00



STOVE	2.00
FIXTURES	11.00
LIVING UNITS	1.00
TOTAL LIVING UNITS	1
EXTERIOR COOLING UNITS	0.0000
EXTERIOR HEATING UNITS	0.0000
OTHER	0.0000
61	100.0
256201	1925 60

BAS	1,416	100	1,416
OFF	482	20	964
TRC	440	25	1100
GRU	260	25	650
OFF	160	20	320
TOTAL	3,758		3,758

1	1304	CONCRETE	100	21	41	821.00	60.00	1988	30	1988	40	20,666	21141
2	0703	TRC	100	10	10	100.00	25.00	1925	50	1925	40	1,000	10X10
3	1003	POOR	1	100	35	400.00	22.00	1958	50	1958	40	3,520	25X16
4	0101	PATIO/DECK	1	100	0	1,760.00	9.00	1958	35	1958	40	6,356	1760
5	0203	POOL	1	100	0	1.00	32,000.00	1958	35	1958	40	12,800	760

C	1	01	REINFR	100	240.00	138.0	50	65.00	240.00	BF	130	1.03	1.00
													3,500.00
													2,544.16
													610,584.17
													UT 17

PROFIT JUST MARKET VALUE	714,536
CURRENT JUST MARKET VALUE	819,954
ASSESSED VALUE	310,965
UNPAID CAP BANK YEAR	1894
TAXABLE VALUE	260,965
NO	Yes
% INC	100.00
TOT ESTIMATED VALUE	50,000

2007R MAR. 2013R NC

YEAR/AREA OF
1 00321 2105
275000 W
V
M

REVIEW DATE	4/30/2018
FIELD NUMBER	224
REVIEW TYPE	Ob11-qee

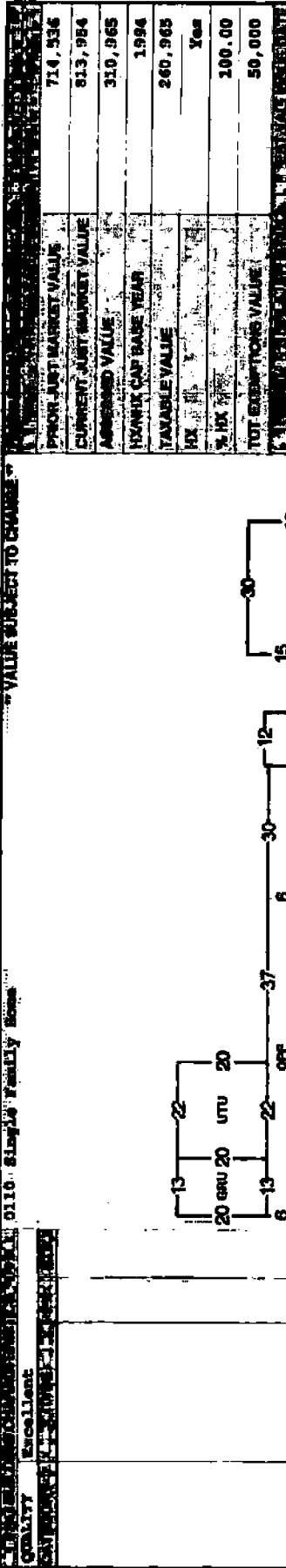
2018 07-31-17-00522-002-0110

KING, MERRILL C II
 774 36TH AVE N
 ST PETERSBURG, FL 33704-1246

774 36TH AVE N, ST PETERSBURG 33704-
 1246
 QUALITY Excellent
 CONDITION Excellent

Page 2 of 2
 PRINTED 8/15/2018
 BY Jannetrong

Map ID: 1114.0 1.00 1.00 1.00 AREA = 11; NEB = 14



PRIOR JUST MARKET VALUE	714,936
CURRENT JUST MARKET VALUE	813,984
ASSESSED VALUE	310,965
HOMERUN CAP BASE YEAR	1994
TAXABLE VALUE	260,965
HX	Yes
% HX	100.00
TOT EXEMPTIONS VALUE	50,000

TOTAL LIVING UNIT	1
QUALITY	0.0000
CONDITION	0.0000
ANNUAL OBSOLESCE	0.0000
DEPRECIATION PERCENTAGE	100.0
2007R MAR. 2018R NC	

202	60	302
234	25	74
USF	50	1,285
1	06321	2105
		275000 M

REVIEW DATE	6/30/2018
FIELD NUMBER	224
REVIEW TYPE	Oblique

ALLENDALE TERRACE ([HTTPS://GREENBENCHMONTHLY.COM/CATEGORY/NEIGHBORHOOD/ALLENDALE-TERRACE/](https://greenbenchmonthly.com/category/neighborhood/allendale-terrace/))

HISTORY ([HTTPS://GREENBENCHMONTHLY.COM/CATEGORY/ST-PETERSBURG-HISTORY/](https://greenbenchmonthly.com/category/st-petersburg-history/))

MAY 17 ([HTTPS://GREENBENCHMONTHLY.COM/CATEGORY/ISSUE-05-17/](https://greenbenchmonthly.com/category/issue-05-17/))

Building a Neighborhood: Allendale Terrace

by Jack Spirud (<https://greenbenchmonthly.com/author/jack/>)

May 24, 2017 (<https://greenbenchmonthly.com/neighborhood/allendale-terrace/building-a-neighborhood/>)

I have often driven the brick streets of Allendale Terrace. The first things I notice when approaching this neighborhood are the majestic oak trees shading the area's streets and homes. One can't help but marvel at the stately old homes, many of which were built in the 1920s and 1930s. Due to my inborn interest in the history of St. Petersburg (<https://greenbenchmonthly.com/category/st-petersburg-history/>), I wondered about the history of Allendale Terrace. I'm really becoming friendly with the folks at our local library.

The history of Allendale Terrace is written largely in much of the life Code B. Allen. It was Allen who conceived and developed Allendale. He was a former brick mason from New York who came to St. Petersburg in 1912, reportedly for the health benefits of its climate. Beginning in 1918, Allen made nine purchases of land around Crescent Lake. He established a truck garden (a garden where vegetables are grown for market) and dairy farm on this property. Some of his cattle actually grazed on what is now Miller Huggins Field. The second of these land purchases was from Perry Snell.

During this time he became friendly with Harold Smith, who was a member of the same church. In 1922 Allen sold this property and went into business with Smith, who was a real estate developer. St. Petersburg's public records show the registration of a deed to Code B. Allen and Harold Smith for 135 acres bought from the estate of W.L. Foster and his wife Amanda in December of 1922. The area had been known as "The Foster Grove" and Code's son Donald believed the price was \$188,000.

Development was soon under way when the two men engaged George F. Young Civil & Landscape Engineers of St. Petersburg to survey and lay out a street and block plan for the land. The plat for Allendale Park, named after Mr. Allen, was recorded on April 4, 1923, and soon, with plan in hand, brick streets with granite curbs were constructed.

Harold Smith and Code Allen shared a real estate office on Central Avenue, and then on 4th Street, until Allen opened his own real estate office at 3849 Haines Road. Around that time Mr. Allen also bought out Smith's interests in the Allendale subdivision.

Between 1922 and 1954, Code Allen and his sons built a total of 40 houses in Allendale, many with a distinct appearance that makes them easily recognizable today. All of these houses were built with hollow clay tile, and a stone veneer was then added to many of them. Some of the homes used local coquina rock, while others were faced with different types of stone, including granite, sandstone, and fieldstone from Georgia, Alabama, North Carolina and Tennessee, brought in by rail.

Over the years, Mr. Allen and his family (which included his wife, Eva and their eight children) actually lived in six different houses in Allendale. First was the original frame house that came with the purchase of the property. It had eight brick chimneys, which were torn down, and the brick was used as a veneer on the frame house and stuccoed. The house was located at 3550 Foster Hill Drive.



3405 6th St. N is the first house that Allen built for his family. Photo by Bill Stinger.

The second house, which was the first Allen built for the family, was located at 3405 8th St. N. (Euclid Blvd.). It was called the "Snow House" because it was so white. The family lived there for about a year, from 1924 to 1925.

The third Allen residence in Allendale Terrace is the gray granite house at 3600 8th St. N. (Euclid Blvd.), completed in 1925. The contemporary address for this beautiful home is now 3601 Foster Hill Drive N. The fourth house in Allendale Terrace occupied by the Allen family, built in 1928 and located at 944 39th Ave. N., was a large masonry, Spanish style home. The family lived here until 1947.

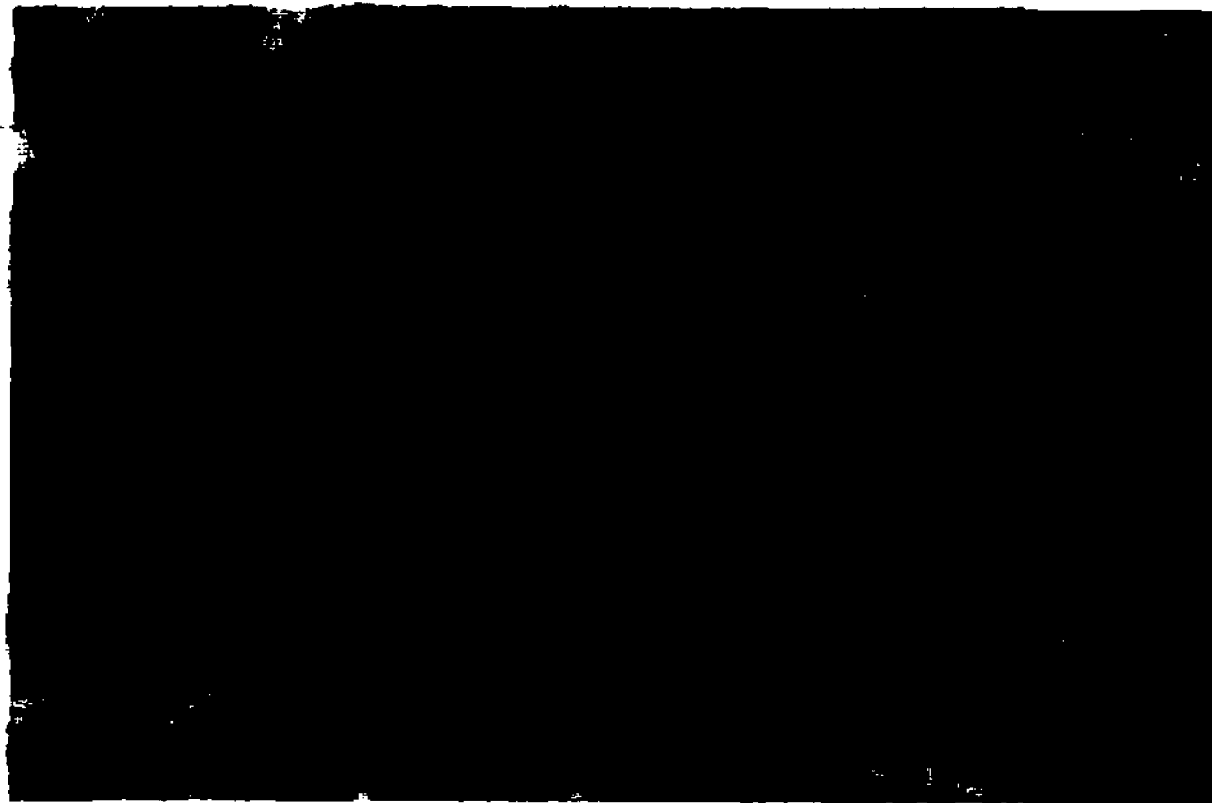
The fifth home was built in 1939 and was sold to a Mr. William Garrison. The Allens bought the house back in 1950. The address was 845 40th Avenue N.



345 40th Ave N built by Cade Allen. Photo by Bill Stinger.

6 The sixth and last house that Allen designed and built as Cade B. Allen & Sons was 1020 41st Ave. N. Built in 1954 of pink and white marble imported from Georgia, the home was occupied by Cade and Eva until Cade's passing in 1966. Eva continued to live in the house until 1968; she died in 1971.

In total, 74 homes were built in Allendale Terrace prior to World War II. Between the War and 1960, there were an additional 188 homes built, with another 50 homes built since then.



Allendale

Terrace

One of the advantages of living in Allendale Terrace is the fact that it is built on a rise, often referred to as "The Ridge", which puts the homes above the flood zone elevations, so residents are not required to purchase flood insurance. By comparison, other sought-after historic neighborhoods closer to the water, such as Old Northeast and Snell Isle—while lovely—would be evacuated in a severe storm, and residents there must purchase flood insurance.

Known for its giant oak trees and large estate homes, Allendale Terrace is considered by many to be the finest area of St. Petersburg that is not located on the water. The area spans from 34th Avenue North to 42nd Avenue North, between 7th Street and 9th Street (MLK). It also includes the area between 34th Avenue North and 38th Avenue North, from 8th Street (MLK) to Haines Road.

The Allendale Terrace Neighborhood Association was formed in 1988, according to its former president, Hardy Bryan, to protect property development rights. As a result, Allendale is one of the few neighborhoods in St. Petersburg where you will not find any apartments or stores within its boundaries. Although the association is not currently active, the neighborhood does have a well-known Crime Watch program. If you get a chance, take a drive or a stroll through the area to view some of the impressive and distinctive Coda Allen homes. To connect with Allendale Terrace residents, log on to nextdoor.com (<http://nextdoor.com>).

Tags: [Architecture](https://greenbenchmonthly.com/tag/architecture/) (<https://greenbenchmonthly.com/tag/architecture/>), [Coda Allen](https://greenbenchmonthly.com/tag/coda-allen/) (<https://greenbenchmonthly.com/tag/coda-allen/>),

[Preservation](https://greenbenchmonthly.com/tag/preservation/) (<https://greenbenchmonthly.com/tag/preservation/>)

f facebook (<https://www.facebook.com/sharer.php?u=https://greenbenchmonthly.com/neighborhood/allendale-terrace/building-a-neighborhood/>)

t twitter (<https://twitter.com/sharer?url=https://greenbenchmonthly.com/neighborhood/allendale-terrace/building-a-neighborhood/>)

G+ google+ (<https://plus.google.com/sharer?url=https://greenbenchmonthly.com/neighborhood/allendale-terrace/building-a-neighborhood/>)

in pinterest ([https://www.pinterest.com/sharerArticle?mini=true&url=https://greenbenchmonthly.com/neighborhood/allendale-terrace/building-a-neighborhood/&title=pinterest&summary=Building a Neighborhood: Allendale Terrace&source=Building a Neighborhood: Allendale Terrace](https://www.pinterest.com/sharerArticle?mini=true&url=https://greenbenchmonthly.com/neighborhood/allendale-terrace/building-a-neighborhood/&title=pinterest&summary=Building%20a%20Neighborhood%20Allendale%20Terrace&source=Building%20a%20Neighborhood%20Allendale%20Terrace))

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Aerial view of garage -
774 36th Ave N
- House



**Electronic Articles of Incorporation
For**

N18000012162
FILED
November 14, 2018
Sec. Of State
diokeefe

ALLENDALE TERRACE NEIGHBORS UNITED, INC.

The undersigned incorporator, for the purpose of forming a Florida not-for-profit corporation, hereby adopts the following Articles of Incorporation:

Article I

The name of the corporation is:

ALLENDALE TERRACE NEIGHBORS UNITED, INC.

Article II

The principal place of business address:

803 35TH AVE N
ST PETERSBURG, FL. 33704

The mailing address of the corporation is:

803 35TH AVE N
ST PETERSBURG, FL. UN 33704

Article III

The specific purpose for which this corporation is organized is:

TO ADDRESS ISSUES AFFECTING ALLENDALE TERRACE NEIGHBORHOOD.

Article IV

The manner in which directors are elected or appointed is:

APPT. OF DIRECTORS

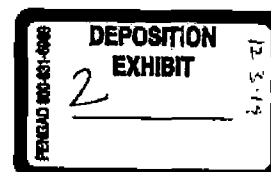
Article V

The name and Florida street address of the registered agent is:

JESSICA ERLICH
150 SECOND AVE N,
15TH FLOOR
ST PETERSBURG, FL. 33701

I certify that I am familiar with and accept the responsibilities of registered agent.

Registered Agent Signature: JESSICA ERLICH



DOWLING_000000758

N18000012162
FILED
November 14, 2018
Sec. Of State
diokeefe

Article VI

The name and address of the incorporator is:

ANNE C DOWLING
803 35TH AVE N

ST PETERSBURG FL 33704

Electronic Signature of Incorporator: ANNE C DOWLING

I am the incorporator submitting these Articles of Incorporation and affirm that the facts stated herein are true. I am aware that false information submitted in a document to the Department of State constitutes a third degree felony as provided for in s.817.155, F.S. I understand the requirement to file an annual report between January 1st and May 1st in the calendar year following formation of this corporation and every year thereafter to maintain "active" status.

Article VII

The initial officer(s) and/or director(s) of the corporation is/are:

Title: P
WILLIAM R HESS
803 35TH AVE N
ST PETERSBURG, FL. 33704 UN

Title: VP
DEREK HESS
803 35TH AVE N
ST PETERSBURG, FL. 33704 UN

Title: VP
ANNE C DOWLING
803 35TH AVE N
ST PETERSBURG, FL. 33704 UN

Title: SEC
ANNE DOWLING
803 35TH AVE N
ST PETERSBURG, FL. 33704

Article VIII

The effective date for this corporation shall be:

11/06/2018