

IN AND FOR OKAL

CLERK NO

DIVISION:

AGENCY

AMENDED DISCOVERY EXHIBIT

COMES NOW the State of Florida, by and through the undersigned Assistant State Attorney, and amends the previously furnished and filed Discovery Exhibit in the above-styled cause, and furnishes the following additional information:


WITNESS NAMES:

ADDITIONAL REPORTS:

Enclosed please find a copy of a statement provided to the State Attorney's Office by Margaret Geddings, former FDLE inspector for the Intoxilyzer 8000's in your area. We have determined to send this information pursuant to Florida Rule of Criminal Procedure 3.220. It is our firm belief that the instrument used for your case was functioning reliably and accurately and produced scientifically sound results.

All of the above listed witnesses are Category A Witnesses unless otherwise designated as Category B or Category C Witnesses. Category A Statement Witnesses are designated by an asterisk (*).

I HEREBY CERTIFY that a copy or copies of the State's Amended Discovery Exhibit has been furnished to: ISAAC T NEWLIN, Attorney for Defendant, KILPATRICK LAW FIRM LLC 9218 NAVARRE PARKWAY, NAVARRE, FL, 32566, by mail/delivery/fax/electronically on 2-23-11.

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Adrienne Emerson: This is an interview, a sworn statement from Margaret Geddings, former FDLE Inspector. Assistant State Attorney Adrienne Emerson is present, along with Investigator Renee Pelotte from the State Attorney's Office. Uh, Ms. Geddings, could you please raise your right hand for me? Do you swear or affirm that what you're going to say is the truth, and nothing but the truth?

A: I do.

Q: Okay. Um, Ms. Geddings, we had a conversation yesterday about the plug pulls issue that's going on in, ugh, Escambia County, and during the course of that, ugh, conversation you mentioned to me, ugh, that there was a situation - there were times that you used a cell phone or radio in order to, um, intentionally abort a, an annual inspection. Can you describe please, um, the nature of that conversation and what you told me?

A: Okay, originally, ugh, you had asked me about pull plugs, and my first and my first reaction whenever I heard of this, was, well, you need to pull the plug, you can just whip out a cell phone and stop the inspection that way, and that way there's a record, and I had mentioned, as a matter of fact, even I've done that a couple of times. And I may have done that in front of an agency inspector. What - I never condoned it, they might have noticed it.

Q: Okay, and yesterday when we were speaking you told me that, um, you had done this at least a dozen times. Do you remember saying that -

A: No, -

Q: - do you remember that?

A: I didn't do it a dozen times, that was an exaggeration -

Q: Okay, but do you remember saying that to me?

A: I do remember saying that. I was being sarcastic. Because, um, what happens, is it happens frequently, RFI's naturally happen constantly with the radios that are around, and ugh, you can tell which ones were intentional, because the, whatever was being tested, um, for example, if I was on an 08 solution, if the first 08 were to show out of tolerance, and then there was an RFI, then I might have to admit that was me hitting the RFI so that I could end the inspection, while still having a record, rather than having to wait for the other 20 or 30 ins- ugh, measurements that I'd have to do -

Q: Okay -

A: - but it wasn't twelve, it might have been two or three.

Q: Okay, um, but that was what you told me yesterday, correct -

A: - yes -

Q: - that it was at least a dozen times?

A: Yes.

Q: Okay. And subsequently you told me that it was at least, or it may have been only six times.

A: Yes.

Q: Do you remember saying that?

A: Yes, and then I thought about it I don't think I intentionally did it that often.

Q: Okay, now, can you describe what you mean by intentionally using the RFI to abort, a test, can you describe physically what you did?

A: Oh, well, physically, you're watching what the measurements are coming up and if the measurements are not within tolerance, you get a second opportunity. Before that second opportunity comes up, you adjust your simulator, you do whatever it is you do with the solution, or orings, or what have you, and then you start the second test. Well, once it starts, if I get out of tolerance again, then that means it's failed the inspection. At that point, at that instant, it failed the inspection, period, end of sentence, no matter what I do. So, instead of sitting around for another 30 minutes to an hour, I would actually take out my cell phone and dial a number, and just call, and that would trigger an RFI, and what an RFI does, is it takes it out of the inspection mode, goes to the very end and says, you're done -

Q: - okay -

A: - so I don't have to wait for the whole rest of the thing.

Q: Okay, and how did you learn how to do that?

A: I don't think - I don't really learned it - like I said, it happened so frequently, that I might have caught on, when we already had a failure, like waiting for the other ten, if a cell phone went off, and I went, Thank God, now we don't have to wait for the rest of the test - is what I'm thinking. My trainer, I don't believe, ever did it in front of me, nor do I condone it or anything to anybody, so I don't know - I don't know where I got that idea from.

Q: And yesterday, you explained to me that there may have been a couple of instances, I think you said two to three incidences where you actually did an intentional RFI in front of, um, agency inspectors.

A: Maybe - I'm thinking maybe. I'd say 80% of my inspections are **not** done in front of inspectors.

Q: Okay -

A: - so, if they noticed it, I'm pretty sure there was one or two that might have been around, considering, like I said, mm, two out of ten, there might have been an inspector there, and out of those one of those must have seen it at some point.

Q: Okay, um, so what you told me yesterday was at least two times that you had done that?

A: I'm thinking, maybe two -

Q: - that you had done the RFI-

A: - or practically maybe two.

Q: Did you explain to them how that works, how you do that?

A: No, no, I never said anything. I just said, if my cell phone didn't work, for example, I tried to stop it with my cell phone and if it didn't work, I would turn to the agency inspector, I remember doing that at least once, and say, they, let me borrow your radio and they hand me the radio while they were doing their little paperwork, I don't think he was even watching the first time, and I'd take the radio, and the radios **always** give off the RFIs, so I just do the RFI, and I hand it back to them, whether or not they noticed what I'm doing or why. I've never - I've **never** explained it to them, that's for sure.

Q: Um, so you've never actually verbally explained how to do this?

A: No -

Q: - how to do an RFI -

A: - just happened to notice it.

Q: But you did actually perform or did actually do that at least two times that you're aware of?

A: Probably two.

Q: Okay. Are you aware of any other times that you may have done that?

A: No.

Q: Do you know what inspectors you did that in front of?

A: I was racking my brain trying to think who it was, and I - I can't remember. I can't even remember. You would think it was Melinda, 'cause I do a lot with her, she is the main inspector that is usually around, but I don't think I've ever done it in front of her.

Q: Okay, you said he a moment ago -

A: - yeah, I think it was a he, and I remember him sitting at his desk, but I can't picture where the desk is. And there's a couple of them that have desks near where they're at, and that would be - Bay County, one, and. I don't remember it being Bay County. I just can't remember.

Q: Okay. Um, let me ask you this. Um, the RFI, can you describe physically what the instrument does when you hold a phone up to it?

A: Well, it should detect a signal, any kind of RFI interference, should be picked up by, as an RFI detector right behind the, um, the display, and it's supposed to immediately stop the inspection, wherever it is and annitrate. RFI detect.

Q: You mentioned - now the instrument itself, will it make a noise when you hold up an RFI or if you hold up a cell phone to it will it make a noise?

A: Yes, the usual two tone, high low, two tone, do dee do dee do dee.

Q: So, the physical act of holding the phone up to the instrument, um, will cause the instrument to emit a very high alarm?

A: Not really high, it's the same tone that it gives when there's any other kind of incident.

Q: But, it's clearly audible.

A: Oh, yeah, it's audible, it's a high -low sound, basically. Are you asking would they recognize it? No, they wouldn't recognize it as opposed to any other thing else that would go wrong, cause all of them have the same tone whenever there's an incident. Nor, do I remember any of them asking me what I was doing. You know, he didn't ask me, he just handed me his radio and I handed it back, it was...they trust me.

Q: You mentioned that, that you don't condone that practice, and you don't approve that practice, why is that?

A: Well, I don't want them stopping. At least I know why I was doing it. And my inspections are an hour and a half to two hours long. You asked me if I'd ever done it during an agency inspection. My immediate answer was no, because those are only 25 to 30 minutes long, if that. There's no need to do them during a, during an agency inspection.

Q: Okay, so this practice of holding an RFI or holding a cell phone, or a radio up to the intoxilyzer, did that ever occur during an agency inspection?

A: Not that I remember. If it did, it was an accidental one, for sure.

Q: And to be clear, the agency inspection is conducted by the agency inspector?

A: Correct, but I've done a couple of agency inspections, and during those, I might have had an RFI, but it sure as heck was never intentional, because again, like I said, they're only 30 minutes long, tops, if that.

Q: And for the agency inspections, you're only allowed two of those before the instrument must be -

A: - right, they're only allowed two -

Q: - removed from service -

A: - correct -

Q: - and you are contacted at that point.

A: Right.

Q: Now, the department inspections that you conduct, you're saying that you have done the RFI on, the intentional RFI's, on annual inspections.

A: Correct.

Q: And you mentioned that you don't, ugh, approve or condone of that, and I believe you kind of answered that, but let's go back to that. Why is that you don't approve or condone of that practice?

A: It's not really approve or condone, it's just, impatient. Um, I could have, I could have sat there through the rest of those ten. What I would do, if those, ugh, numbers were not back up to where I needed them to be, I would let it, run, and that way I would not have to worry about whether or not the next inspection's going to pass, but once I'm for sure what the problem was, and I'm just waiting for the rest of those to go, it's just a way to save time.

Q: What prompted you or what prompts you to want to do an intentional RFI?

A: Impatient, and I wanted to get - some of these are done at jails, that are very busy, with lots of people around, you know, get in and get out as fast as possible, without being interrupted.

Q: Well, what's going on with the instrument at the time that you made the decision to do these RFI's?

A: Nothing, probably, whatever, the - what do you mean?

Q: Well, what I'm getting at, is what prompts you to want to do that? I understand that you have a time constraint, but is there something going on in the inspection that prompts you to say, okay, now it's time for me to, to, to abort this test?

A: No, no.

Q: Okay, well, do remember yesterday when we were talking and you mentioned to me that when you're going through an inspection and you realize the instrument is going to fail for some reason that you have caused, that's, that would be one reason why you would do an intentional RFI?

A: If it already failed one, and I knew it was going to fail the next one, or it started to fail the next one, that was when - it might as well, - it's failed at that point. The only time I ever did an intentional RFI is when it had already failed, as in twice, so no matter what I did from then on forward, it would still be a non-compliant inspection. It just simply ends the inspection process early, rather than do all the rest of the tests that are completely irrelevant, because it already failed.

Q: Right, but what I'm getting at is the instrument itself - um, the - you, you decided to do the intentional RFI at the time the instrument was failing, correct, or had failed the inspection?

A: Correct - usually because something I did, for example, the 08 solution in that case. My seal wasn't tight, and then when I did tighten it I didn't tighten it right, or didn't tighten it enough, or I had a tube that I didn't reconnect, and it started to fail it again. It was never the instrument, ever. It was always something I could identify, my fault, and the inspector said I could start over.

Q: Okay, a moment ago you said usually the reason was because of something that you did.

A: Yes.

Q: Usually. Usually implies that there were other times when it was the instrument, so which is it?

A: I shouldn't say the instrument - it's - it's always something that I do, um, as far as -

Q: - so when you said usually, what did you mean?

A: Ugh, well, I'm trying to think if there was ever a time the instrument had a problem - not really, um. I don't remember saying - I know I said usually, but I really didn't mean that. 99.9% of the time it was me. I can't even think of a time it was ever the instrument malfunctioning, you know what I mean? In other words, of all the times I could have intentionally stopped an RFI, when I the repeated the inspection, it always passed. Always. Always. Always (laughing). Cause I knew what was wrong. Again, if I didn't know what was wrong, I would have never intentionally stopped it, because I would still be trouble-shooting at that point.

Q: When you decided to do these, again, these were all on annual inspections, or department inspections -

A: - mm-hm -

Q: - is that correct?

A: Correct.

Q: Um, and do you remember which counties you might have done this in?

A: No, I tried to, ugh, I tried to think of that, I did check the thirteen that were listed in this affidavit, and -

Q: - and referring to what affidavit?

A: Referring to the Workman, whatever his statement was, that he mentioned thirteen specific instruments.

Q: The Tom Workman Declaration, that has been provided by the defense?

A: I checked all of those, and none of those had an intentional RFI, matter of fact, I think only one had an RFI, and the instrument was passing just fine, so obviously somebody walked by with a cell phone during a perfectly good, you know, inspection. Here it is.

Q: How would you have noted on the - on the inspection, and you - you actually handed me an annual inspection, a department inspection, completed May 8th of 2008 on Intoxilyzer Number 80-001303, a Santa Rosa County inspection. Ugh, the time of the inspection was 11:26 a.m. On this particular one, you note in the remark section that someone walked - an officer walked by with a cell phone -

A: - correct.

Q: How would you know, um, the difference between an RFI that was not intentionally caused by you?

A: I remember typing in, for example, the one that I asked for the radio, I typed in "radio too close," or "cell phone too close," which meant **my** cell phone or **my** radio was too close.

Q: Okay. And that was your code to let you know that was one -

A: - that's the truth - my phone was too close.

Q: Right - but those are the ones - you're saying that any - any of the instruments - any of the inspections that you completed wherein an intentional RFI was - was - done -

A: Well, I couldn't tell myself, because accidentally I would answer my phone, and it would ruin a perfectly good inspection with an RFI.

Q: So, how would we know, in going back through the records, which ones -

A: - again -

Q: - were intentional -

A: - it would be a failed inspection, it would be on the second trial, if it was going to fail or already started to show that it was intolerance, and the RFI was after that, that would be intentional.

A: Okay, did you -

A: - I would not sabotage one that's perfect.

Q: Would you - is there anything in the remarks section that you noted to let somebody know that you had done that?

A: Yes, "cell phone too close" or "radio too close."

Q: Okay, but you indicated a moment ago that some of those can be, um, unintentional by somebody walking by -

A: - correct -

Q: - but others could be intentional -

A: - or it could be me using my own phone.

Q: Correct - um, but it could also be you intentionally using your phone or dialing somebody as you stated earlier?

A: If it was a failed inspection, then I would have to agree that would be me stopping the inspection before it had to go through all the rest of that.

Q: And when that happened, um, say we find an annual inspection where it's got a failed inspection and an RFI, would there be anything in the remark section that you've noted to let somebody know that's what you were doing?

A: No - it's "radio too close," it's very short. Whether the radio was too close intentionally or by accident, is irrelevant, the result is the same. It stops the inspection at that point.

Q: Okay. Well, the difference would be intent, right, I mean, one would be an accidental RFI, the other would be intentional -

A: - you know, I thought about that, but what about an intent of, man, I wish this would stop because it's already failed and somebody were to walk by and it were to go off. My intent was, man, this is great. I mean, intent is, is irrelevant.

Q: Well -

A: - because, it's irrelevant because it already failed, I'm just stopping it sooner.

Q: Sure -

A: - it's still documenting every single thing that I did. It's even documenting the exact RFI, exact time, and I am putting exactly what happened - the cell phone was too close. None of that is a false statement.

Q: Right. Well, regardless of relevance, my question is still, what was - how do we tell between the difference in intent, because the question of intent is certainly going to be an issue-

A: The intent would be, I would, I would have to admit, even if I wasn't sure, I would have to admit, any inspection that failed, and then after that second fail had a RFI, I would have to admit that that might be one of my purpose intended ones. I would also say, something like this, where it was absolutely doing fine -

Q: - and -

A: - I can guarantee that I didn't do that on purpose - because why would I stop a good inspection?

Q: And you're referring when you say this, you're referring to the inspection that we just mentioned -

A: - correct - the previous -

Q: - serial number -801303 -

A: - 1303 -

Q: - dated 5/8/08 -

A: - at Santa Rosa -

Q: - department inspection done by Maggie Geddings.

A: Correct.

Q: So, you're intent when you purposely did the RFI was to abort the test?

A: Was to stop it where it was, correct.

Q: Okay. And that would allow you do what?

A: Repeat the inspection.

Q: Did you contact anybody to let anybody know that it had failed that inspection?

A: My usual notification. If there was a problem, um, whenever someone does fail, I let the inspector know. It's just out of courtesy, I mean. Once, once it's repeated and passes. They'll see. Everything is documented, they'll see why it failed. That's why I don't have any problem with it - it's. I don't condone it, but It's not illegal, either.

Q: You said you notified, um, the inspectors, so each time that you did the RFI intentionally you notified your inspector?

A: If they were present.

Q: Okay, and who was -

A: - if they were present, I would say, oh my 08's, I've got to redo my 08's. Sorry, I've got to do this over again.

Q: But you wouldn't say hey, I just held the cell phone up because it's failing -

A: -no -

Q: - and I'm going to redo it -

A: - no, I would address the actual issue that was - that occurred.

Q: Okay, who was your inspector?

A: Who was who?

Q: Who was the inspector that you notified?

A: I don't know, that's what I mean, whoever was sitting in the chair behind me at that desk, I don't remember who it was - I've done so many of them.

Q: You're referring to an agency inspector or -

A: Hm-hm, yeah, the agency inspector, for example, that I took the radio from. He hears the tone, and he says, oh, you gotta start over again, and I handed it back, and say, yeah, my 08's weren't - weren't in compliance -

Q: - okay -

A: - and then I'll usually say, because of my, you know -

Q: How often did someone sit in with you?

A: Not very often, like I said, maybe 20% of the time I had an agency inspector present. Most of mine were on midnight shifts in this region.

Q: Did you notify anyone else other than agency inspectors about the failed inspections?

A: No, I give them copies, though, and I write them notes. So I'll give them a copy of the failed one with my RS's -

Q: - you give the agency inspector -

A: - oh, yeah, I leave a copy for the agency, an unofficial copy because it hasn't been received and stamped by Tallahassee. But I always left my guys a copy of this, a copy of these field notes which you'll see, saying, you know, what date and time, and a note.

Q: Um, did you then forward that to Tallahassee?

A: The originals would go to Tallahassee, they would just get a copy.

Q: And who in Tallahassee would you send that to?

A: Ugh, Laura, Barfield.

Q: Okay. The remarks section that you're referring to, um, this is separate. Excuse, me, the department inspector field notes that you're referring to -

A: - correct -

Q: - Um, would you have noted anything in there letting anybody know that you had done, ugh, an intentional RFI in order to repeat, an, ugh, inspection?

A: No, there'd be no reason to.

Q: Did you ever learn in any of your materials that that was a way to - to abort an inspection?

A: I learned it's exactly what causes it to stop was an RFI.

Q: Did you learn that through any teaching curriculum that you received to become -

A: - no, it's just a knowledge whenever a cell phone goes off, or a radio goes off, it stops the inspection.

Q: Okay, let me finish my question. Um, did you learn this in any of the curriculum, um, that was taught to you to become a breath test operator, a breath test inspector, or to work with FDLE? Was that in any of the curriculum?

A: I, I think I might have seen one of the other inspectors do it when we all get together on the training instruments. But I don't, I don't, I don't remember a specific time. It seems like I've always known that a radio interference will stop the inspection, and if you already know what the problem is, you just hit your radio, and that's why I was so shocked at Sandra's case. Again, that was the first thing in my head, even way back then, was why would she unplug it when all you have to do is put a radio up to it. And that way you have the documentation, and it's legal, I mean, you did the inspection, you have an RFI, you say that you had the cell phone too close, and you continue.

Q - okay -

A: So, I must have thought that all along, I just didn't do it regularly. I would say I wasn't always in a hurry, or trying to save time.

Q: Well, let me ask you this - if it's a practice that you don't condone, how is that you think it's - it's legal?

A: It's legal as in what I did was not against any specific regulation. There's nothing that says your phone goes off, accidentally, slash purposely, whatever the reason. Long as it's documented. Our, our stress in our training was we always want to have it documented what you do, from the minute you log in, to the minute you log out. So, to me, within that realm is, if a cell phone goes off accidentally, that's one thing, if it goes off on purpose, it's still the same result, I still have my documentation.

Q: Um, if you believe that to be a, a valid way to do that, why, why didn't you instruct the agency inspectors on how to do that?

A: Again, theirs is only 30 minutes long, it can't possibly help any time for them, it wouldn't save them an hour of stuff, or 30 minutes of stuff, 'cause their whole - their whole inspection is only 30 minutes. And I didn't do it on practice, because I just thought it wasn't a good idea, because I would rather let the whole thing run out and see, like again, if I was trouble shooting, I would let it run out, and if I'm not in a hurry, I'd let it run out. But those two circumstances, I'm pretty sure, we were in a hurry, it was very busy, I wanted to get going, I had to do it again, and it's was just one of those, you know what, an RFI would do it. Boom, let's do it.

Q: And you mentioned two incidents specifically, which ones are those?

A: The one where I handed that one radio to that guy that got his radio and the other one was somewhere else and I used my cell phone on that one and it worked fine.

Q: And do you know what county or what inspector was present?

A: Isn't that terrible, I do not. I just remember I didn't do it intentionally in front of them, that's for sure. I never recommended it.

Q: And when, let me ask you about the -

A: - I do not remember.

Q: - incident with the other, um, inspector that was present. You said at some point your 08's weren't working and you've looked behind you, did you ask for a radio, from that agency inspector?

A: No, no, I asked for his radio first, and then when he heard the two-tone, do do do do, and I handed it back, he kind - we were laughing, because he knows what that means, that means I've screwed up and have to start over again. And, so when I handed it back, I said I have to my 08's over again, that way I'm explaining to him that it's not the instrument, I'm just repeating it because my 08's were off.

Q: Okay. And you don't know who that was?

A: No, I wonder if it was - who's the one who's retired from FHP? Mike Strickland -

Q: - mm-hm -

A: - I think it might have been Mike Strickland with FHP -

Q: - Okay -

A: - 'cause he went to school with me, too, and he would be the one person I would feel comfortable doing it, you know, in the same room with.

Q: And what - you said you were laughing, what were you laughing about?

A: I was laughing because we have to do it all - when you hear that do do do do do do, it might as well as be saying idiot, idiot, idiot, because you know you made a mistake and have to start over.

Q: And, so you said that Mike, um, would know, Mike Strickland would know what that meant?

A: Yes, he would know that I screwed up. He was - his concern would be is it my instrument, or is it something you did, and that's why I was laughing, and said, no, it's me, I have to do the 08's over again.

Q: But you're saying that he knew what you were doing as for - putting the radio up to the instrument and -

A: - no, no, he didn't - I don't think he thought twice about it.

Q: But in front of him you did take - ask for his radio, right -

A: - yeah, I did -

Q: - and you did take the radio and put it up to the instrument, right?

A: Mm hm.

Q: And the instrument immediately sounds the alarm -

A: Yeah, he was busy with paperwork, so I figured if he noticed -

Q: - okay, but the question is, the instrument immediately alarms?

A: Mm hm.

Q: And, after, immediately after that you hand the radio back to him?

A: Correct.

Q: And you're both laughing?

A: Yes, that I have to do it over.

Q: Okay, and you said at that point, that I've got to do it over again.

A: Yeah, well, I didn't say I have to do it over again, I said it's my 08's, I have to do them over again.

Q: What happened on the other instance, you said there were two instances, what was the second one?

A: I do not remember, the other one was my own cell phone, and whether or not there was anybody was around - I vaguely remember a, a department inspector being there. It might be Billy Brock with Washington. You might want to ask him. He comes in and out of the room, so whether or not he was actually there if I had done it, and if it was one of those. Ugh, but, again, that's not one of the one's listed. I think, um - what's Washington County's - I don't remember - seven, no, - I'll have to look at the numbers. But again, the important thing is, the integrity of the instrument is never in question. Everything I did was exactly documented, including the RFI, whether it was an intentional RFI or not, it is documented exactly what happened, and I always repeated them and they always passed.

Q: Well, it's documented in the sense that there's an RFI that appears on the -

A: - and that it was a radio -

Q: - on the inspection -

A: - or a cell phone -

Q: - so, it's documented in the sense that the RFI is on the inspection, correct?

A: Yes, yes, but all of them have it -

Q: - but it's not documented in the sense that you did not put on there that it was intentional in order to abort the inspection to begin again, and begin a new inspection, is that correct?

A: No, it doesn't matter because it stops the inspection.

Q: It may not matter, but the answer to the question then -

A: - right. Whether or not I typed in there, officer walked by with radio, versus I'm tired of waiting and wanna go home is completely irrelevant as far as the accuracy of the instrument and the documentation. It is exactly the same, and it does not compromise the inspection at all. It compromises me not having, you know, patience to let it run through the rest, but it does not - it always makes you repeat it, it always, you know, is - is passed after that.

Q: Okay. But, so the documentation is not going to be there that this was something that you intentionally did to abort the test and begin a new test?

A: Correct, I would never put on there I'm just tired of this, I wanna go.

Q: Okay.

A: I would never say that. I would put radio or cell phone too close.

Q: But that was in essence what you were thinking, correct? That you were tired and wanted go home?

A: Well, it depends, if they're in a hurry, if I was in a hurry. I mean, there was only two times that I remember doing it, and one of them, it was mass hysteria, there was so much going on. And the other one, I don't remember, I was late, and I had already, ugh, and I'd already done another agency, so it was late at night, and I was like, man, if I could do this again, or I've got to wait, it's already 8:00 or 10:00 at night, yeah.

- Q: Okay. Now, these two that you just described, those are different than the ones you just described to me a moment ago with - with, um, Mike Strickland sitting in the room when you asked for his radio?
- A: No, Mike Strickland was one, and it might be Billy Brock being the other -
- Q: - okay -
- A: - walking in and out of the room.
- Q: Now, the Mike Strickland, which one is the mass hysteria incident?
- A: Well, mass hysteria, I don't mean mass hysteria - it was just very busy.
- Q: In which incident -
- A: - Mike - Mike Strickland's would've been busy.
- Q: Okay. So, the time that you asked for his radio and held it up to the instrument when he was sitting behind you, that's one of the incidents you're referring to with the mass hysteria?
- A: Well, it wasn't mass hysteria. It was busy, it was traffic going in and out. He had to get on the road, people, you know. It's in an FHP station where there's lots of traffic, it's just a nightmare.
- Q: The other incident that you described with Billy Brock. What was going on there, you said you were tired and wanted to go home?
- A: Yeah, it was late, and I had already done a whole bunch of inspections and he has - actually, they have a nice setup that's usually in the training room. So it's nice and quiet and there's nobody around normally. So, whether or not he was in the room when I did it to start over, I don't know.
- Q: You seem to remember these with pretty good accuracy.

A: Well, I remember these two incidents, but I don't remember if I used my phone on the Washington one. I know I used the radio for Mike, and I'm pretty sure it was Mike. But Billy Brock, I don't remember if that was one of the places I did it or not. It's just - I would have to go through every single inspection I did. And again, even if I'm admitting to these, I know two at least times, I would have - I would have to say, any inspection that failed and had an RFI, whether I did it intentionally or not, I would have to admit it could have been intentional, because it's the same result, it is completely irrelevant, whether it was intentional or accidental, the documentation is the same, the integrity of the inspection is the same, the repeating of the procedure is the same, everything is the same. And it differs very much from pulling a plug, because pulling a plug, you've erased that you've done anything at all, and I would **never** do that. Like I said, when you have a radio that you can stop the inspection, and document it, there is no need to turn off the power.

Q: When you spoke to me yesterday you said there were, um, when we spoke and I asked you about the intentional RFI's, uh, and you mentioned to me that when you heard about the Sandra Viega hearings, you thought, why would she do that when all she had to do was hold a cell phone up to it?

A: Correct. That was my first reaction, well, if you're really in that much of a hurry, you can whip out a cell phone and do it again.

Q: And at that point, you told me, in fact, I asked you, what does that mean, and you told me what that meant, and you said, well, in fact, I've done at least half - I've done it at least a dozen times?

A: Correct, now, when I said that, we do it on on training instruments a lot. Training instruments do not upload to this system, so whatever you do to training instruments - is play time, basically. And I know I've done it a lot, but I didn't mean a lot on instrumentals, I meant I've done it a lot. And actually, if you ask any of the inspectors, they'll probably say that, yeah, they'll hit it if they're using a training instrument, and they're trying to do something and it doesn't get what they need, or whatever, you just hit that. That way you still have a document and you start over. Now if you don't, you just turn it off, turn it on, during that, 'cause it's a training instrument. So, yeah, I've probably did it a dozen times with a training instrument, but I know two I might have done it. I'm pretty sure that I did it on two.

Q: Do you believe that other department inspectors know how to do this -

A: - well -

Q: - intentional -

- A: - yeah, I'm just thinking, I'm pretty sure that's where I got it from. But, I shouldn't have done it on an instrumental. You know, normally, on evidential we're very careful about that. But, I'm pretty sure I've seen them do it on training instruments quite a bit. Because, again, it's a training instrument and if you're in a hurry, you want to start another inspection or do whatever.
- Q: Now, when we spoke yesterday and you told me that you've done this at least half a dozen times. Uh, I'm going to need to nail down exactly how many times you think you did this because -
- A: - I would have to go through literally every one-
- Q: - hang on, hang on. Before, when you said it was at least half a dozen times you said that rather cavalierly, kind of like yeah, I've done it at least half a dozen times -
- A: - correct -
- Q: - today we're down to two -
- A: - on evidentiary instruments. Now, you -when we're talking in general, I have literally hundreds of inspections - literally, if not a thousand or more. I meant evidential, I want to be specific. Only two that I remember on evidential instruments. Now, I've done it a bunch of times, as in - on purpose when I'm either I'm doing a training instrument or some other, you know, ugh, what you call it, research stuff that we have to do in Tallahassee.
- Q: Did you feel like you needed to qualify that answer yesterday, and let me know the difference?
- A: I should have, I didn't think about it, I was so concentrating on the specific two that I remember doing. And then I was trying find out which two those were, I have to look them up. It just never dawned on me that you wouldn't differentiate, because I do so many different, you know, things, as far as research, training. Evidentiary is a whole different ball game.
- Q: Well, we were talking about it in the context of specific instruments, right?
- A: Of these thirteen, I'm pretty sure I hadn't done it all. I'm pretty - I'm right, actually, I looked them all up for the last four years.
- Q: Okay, but yesterday we were talking about in the context of those thirteen machines.

A: Mm -

Q: - listed -

A - sometimes, sometimes we were talking about the 150 in general that he was talking about - and then he, then he narrowed it down to the 76.

Q: No, but, listen to my question. What I'm saying is yesterday we were talking about all of this in the context of the 13 machines -

A - no, we talking about -

Q: - not inspections, 13 machines -

A: - oh, oh, machines, yes.

Q: Correct?

A: Yeah, we were talking about 13 machines, sometimes.

Q: Right. Sometimes?

A: For example, if I thought you meant those 13 machines, I sure as heck wouldn't have said oh, yeah, I've done it half a dozen, dozen times. Not on instrumental machines. I would have **never** said that. (Laughing)

Q: Maggie, we were only talking about those 13 instruments.

A: No, we were talking about the 150 inspections that he -

Q: - done on -

A: - started with -

Q: - the 150 inspections completed on those 13 instruments -

A: - ugh, no -

Q: - that's what -

A: I thought the 150 were all of them -

Q: - hang on, we were talking about this in context of the declaration from Tom Workman, right?

A: Correct.

Q: And in that declaration we were only talking about those 13 instruments.

A: No, well, I misunderstood, I thought we were talking about all instruments.

Q: Did the - did the declaration say anything else about any other instruments?

A: No, we got off tangent with the RFI. We were talking about these specific 13 with the pull plugs. And we were talking about pull plugs, talking about pull plugs, and I said, there is no reason to pull the plug when you can just - - and then I said I might as well as admit to you that if I were to stop it early, I would do the RFI, and that's when we started talking about all my instruments. I mean, I assumed you were talking about all my whole region, and my whole region, if I were to ever want to actually stop an inspection, I would not turn it off, I would whip out a cell phone like I did those two times that I knew of and stop it. At that point, we were not within just these 13, you were talking in general, at least I was talking general.

Q: All right. But, I never gave you any indication that we were talking about anything other than those 13 in the declaration, which is why I brought you in.

A: Oh, I definitely did not get the impression we were talking about these specific 13.

Q: - Well, but today -

A: - I mean, that was my misunderstanding My misunderstanding was we were talking about the 13, about the pull plugs, and then off the subject was, well, if I was ever going to do it in my whole region, I would whip out the cell phone, and do it, and that's when you asked, well, have you done that a lot, and I was like, yeah, I've done it a dozen times, but I meant training and in the whole region, God knows what I was doing, or if we were doing a live DUI, matter of fact I probably did it then, too, when were doing a drinking lab and they were in the middle of something and they wanted to start it again, I probably did it then, you know what I mean, it's in general, probably a dozen times. Evidentiary - two. These 13, none.

Q: But we never differentiated in our conversation the difference between an evidential breath test and an evidential inspection -

A: No, no - I just jumped to the conclusion. I was talking about all of them.

Q: Okay. And in all of them, you're saying, I did it at least a dozen times?

A: No, I was saying I've done the radio thing to an instrument to stop it a dozen times, because it's a common thing to do when you want documentation, and then I said, am I going to have to submit that on the stand, and you said, yes, we're going to have to tell the defense. And then I started thinking, well, did I - how many times did I do it with an actual evidential, and that was only two that I can think of, maybe six. And I'm thinking six, because I've been here four years, if I did it twice a year, and don't remember from year to year it might have been, and then I can only think of two evidentiary times I've done that.

Q: Well, let's back up, because when we sat down, you changed from twelve times to two times. Now we're back up to six times. So, I need to go back and - hang on, and before you say anything, we need to go back and clarify exactly what you're talking about, because you're changing your testimony on me here.

A: - yes -

Q: You started off telling me I at least did this twelve times.

A: - correct -

Q: You walked in here today, and hang on, you walked in here today, and you said, I can only think of two times I did that -

A: - correct -

Q: - and now, you just said, possibly six times I've done that.

A: Six being the evidentiary, if I had to go back and check. For example, this is not something that I saw a problem with.

Q: But, it's not something you approved or condoned of?

A: - no, I would put that in the 08's in the remark, you see what I'm saying. For example, in here, the um, the ambient failed, it was a small room, I opened the door. Yeah, that kind of thing. I would actually put, as in nothing changes, whether it's by accident, an RFI, or whether I did it on purpose as an RFI. It's the exact same thing on paper. It is the exact same procedure, it is the exact same integrity, exact same integrity of that instrument, whether it's intentional or not.

Q: I understand that's your position. What I'm trying to get to the bottom of, is this - there is no documentation of you intentionally doing the RFI in the remark section?

A: Correct.

Q: Because you did not put it there?

A: No, no.

Q: Nor would you have?

A: No.

Q: Well, my question to you is this: if you don't approve of this process, why do you do it?

A: I only did it, like I said, a couple of times, when it was a time crunch, or whatever was going on at the time. It's not, like I said, I don't think it's not illegal. I don't think, it doesn't say you can't purposely hit the radio and stop your inspection. But you shouldn't have to say that, you know what I mean - it's it's -

Q: - if you don't approve of it, though, why would you even do it at all?

A: Well, because I was running out of time, and I had people running a round, so it was a matter of time before I had an RFI anyways.

Q: So, you believe that time was a valid justification to do something that -

A: - right-

Q: - was improper?

A: Not improper. It was not improper. It's not recommended, but there's nothing wrong with it. If my agency inspector went in there, and he to get a call and he had to leave, if he would rather, instead of hitting that abort button, he hit his radio and got an RFI, and I wouldn't care - whichever way you need to stop that test, is fine. Now, he doesn't do that, I don't recommend that. But if he were to come to me and tell me that, and say, hey, I forgot - I forgot about the abort button, so I went ahead and hit my radio so it would stop and do an RFI. I'd be like, alright, next time, hit the abort button, whatever.

Q: - okay -

A: - but it's not illegal. I wouldn't write him up for doing something illegal.

Q: But I'm talking about your particular practice. When you do this - you said already -

A: - and normally, I would not do it - normally, I would not do it.

Q: But you did it at least a dozen times.

A: Yeah, with it - between training instruments and the two on the evidentiary, yeah. And the concern is, I did not recommend this for my agency inspectors, I didn't recommend it for myself, I did it two times out of extraordinary circumstances, and even those two times the procedure was never deviated from. The integrity was never questioned, because it's irrelevant.

Q: Well, I think the integrity is questioned in the intent.

A: Yes, my intent was to end it sooner. And to document that I ended it sooner.

Q: Why didn't you press the abort -

A: - if you want me to, I can go back to all of those, and write in there I was running out of time. I can edit those and put cell phone on purpose, or something like that, if you'd like, it's not going to change -

Q: - absolutely not -

A: - the result -

Q: - No, it's not I would not recommend you go back and change an affidavit. What - what I'm asking is why didn't you press the abort button as you instructed your monthly inspectors?

A: I don't remember why I didn't, to tell you the truth. That's a good question. What was different if I was to abort it?

Q: If this the procedure that you're recommending to your agency inspectors -

A: Yeah, yeah, they abort it.

Q: Hang on. If you recommend that procedure to them, why didn't you follow same suit?

A: Because I wanted to trouble shoot, and find out what's the problem before I, before I stop it. And if you abort it, then you don't get to find out what the next ones are.

Q: But the test stops -

A: - the radio does the same thing. It just never dawned on me -

Q: The test stops as soon as you press the abort button or do an RFI, correct?

A: Correct.

Q: So you could stop at any time by doing either?

A: - yeah, I don't know why I didn't -

Q: - so, it wouldn't make any sense not to use the abort button?

A: Right, I don't know why I didn't, tell you the truth.

Q: Well, if that's the procedure you were instructing your agency inspectors on doing, why wouldn't you follow suit?

A: It never dawned on me to do it, tell you the truth. I, I - now that you think about it, and I'll be honest right now, under oath, I don't know why, that would have been be a lot easier. Instead of hitting the radio, you just hit the abort, and I would still have my documentation. I believe. Yeah, if you abort it, it still gives you the numbers. So, it just - I never thought of it, isn't that terrible. And, yet, that is the procedure that I tell my agency inspectors.

Q: Well, does the aborted test, does that get automatically uploaded to Tallahassee as well?

- A: Yes, it might have been that, it might have been pride, or, you know, not wanting Laura to know. But Laura's going to know anyway, 'cause she's going to see what the error was, so honestly, under oath, I have no idea why I didn't just hit the abort button.
- Q: Well, the difference in the error, though, is one is intentional. I mean, with that abort button=
- A: - and that is an error - abort is an error -
- Q: - hang on, let me finish. Let me ask you this: an RFI where you don't document that this something that you intentionally did, can look like an accident, or it can intentional, by your own words, right?
- A: Right.
- Q: But, pressing the abort button is definite and you can't-
- A: - you wouldn't know why they aborted it. Did they abort it because it they ran out of time, did they abort it because it was busy, did they abort it - you still wouldn't know the intent of the abort, unless you specify -
- Q: Right, but that would be something that you intentionally do is press the abort button, and that would go to Tallahassee and Tallahassee would question you as to why did you hit the abort button, correct?
- A: No, I would put it in the remarks field.
- Q: Okay. But you wouldn't put it in there if you intentionally did an RFI?
- A: No, I would just put RFI, cell phone too close.
- Q: Well, don't - don't you agree, that if you don't do that, there would be no reason to question you on an RFI?
- A: Right, I, I, I, don't know why I didn't think of that - that's a great - that's a great idea. I should have done that, I should have just hit the abort.
- Q: Okay. If you intentionally do an RFI and you don't document in the remark section, there is no reason for your boss to come and say to you, what happened, because it could have been an accidental RFI, there's no way to know, right?

A: It's the same. It's a cell phone too close, or radio too close, it's the same.

Q: it's -

A: - Matt, my trainer, did know that I did that on purpose, at least once.

Q: And, okay, because earlier, I asked you, if you learned it from anybody or if anybody taught you - .

A: I didn't learn it from Matt Myatt, but I do remember telling Matt Myatt that I was in a hurry, so I just hit the - I accidentally got an RFI, and I'm sure he understood what that mean.

Q: Why are you sure he understood what that meant?

A: Because he' laughing. I'm sure he was laughing.

Q: Well, had you ever discussed it with him before?

A: No.

Q: Why would he be laughing if he didn't know what you meant?

A: Well, 'cause, Im sure some other agency inspector was getting frustrated after having to wait, and they would hit the radio thing. Probably not in evidentiary, though.

Q: Well, let me go back and rephrase my question about the RFI before we get on that track. If you don't put in the remark section that you did this intentionally, there is no reason for anyone to question you as why that test was aborted, correct?

A: They might want to intentionally know why I had my radio too close to the instrument.

Q: Right, but that would be very - that would be less suspicious, wouldn't it. There wouldn't be any reason to question you -

A: - right

Q: - if it could have been an accident -

A: - well, there's no reason to question, even if I intentionally did it, they would be like, why did you intentionally do that. I'd say, because I didn't want to wait. There's no secret.

Q: But that would automatically - an abort would automatically prompt a question, because your -

A: - pushing abort -

Q: - right - you're saying - I'm aborting the test.

A: But again, in the abort I would put the same remarks that I put on an RFI. In addition to the RFI, let me - I see what you're saying. The RFI is like some innocent RFI versus an abort where you're stopping it on purpose. I understand the distinction, I probably should have done that, but, whatever the issue was, I always documented what the issue was. So, even if there was an RFI, and I've put cell phone too close, I always documented, 08, tighten seal, or whatever the problem was, or interferant had acetone in it, you see what I'm saying?

Q: Yes. But let me go back to my question. My question is, pressing the abort would automatically raise a question, you'd automatically have to say, I pressed the abort, because, X, Y, and Z, right?

A: Correct.

Q: RFI, you don't necessarily have to explain why you intentionally did that - you simply explain -

A: - that it was X, Y, and Z. Same exact words.

Q: Except, the intent -

A: - only it says RFI versus abort, abort versus RFI, that's the only difference.

Q: Let me go back to Matt Myatt, um, you said he laughed when you told him that you had intentionally done an RFI.

A: I'm pretty sure, one time, we were talking about inspections, and how late it gets, and sometimes, you're doing so many, and I said, yeah, of course if it's going to repeat it, and it's too late, you can always have an RFI or a phone too close. Because everybody knows that what happens when a phone gets too close.

Q: How does everybody know that?

A: Because that's what an RFI does.

Q: Well, how does everybody know that you just hold up a cell phone and it'll abort the test.

A: Because it happens all the time.

Q: Alright.

A: Not intentionally, so that's why when you say it happens all the time, literally, people come waltzing by - .

Q: Okay, for Matt Myatt to laugh with you about that. You said there wasn't a mutual understanding that's what that meant - that you had intentionally done that, is that what I'm getting? That right? Yes or no?

A: Yes, I'm sure that he understood that that's what I mean.

Q: Alright. And if you're sure that he understood that, how are you sure he understood that?

A: Because of his laughing. In other words, when I say, well, of course, a cell phone could accidentally go off, ha ha ha, and he would be like, yeah, good timing, you know what I mean, he would laugh, because he knew what that meant.

Q: Which is what?

A: That a cell phone went off very close (laughing) not accidentally, probably.

Q: Okay. So, you're saying when he was laughing, the common understanding was that it had been intentionally done, the RFI had been intentionally done.

A: Correct. That somebody would have walked up and done it.

Q: What was his response to you?

A: Nothing, he just laughed.

Q: Did he ever -

A: - I'm sure he didn't assume I was doing it frequently, nor did he assume it was okay. He was laughing because it happens.

Q: So, he knew that was something you had done?

A: Yes, I'm pretty sure he was aware. In other words, I know he was aware that I had done it at least once.

Q: Who else would be aware?

A: Ugh, Just Matt, probably, I don't remember anybody else being there. Whether Dwight or any of the other inspectors were around at the time.

Q: Have you joked around with anybody else about this procedure?

A: No.

Q: Have you talked to anybody -

A: - well, it's not really joking. It's not something you do during inspections, generally speaking. It just happens all the time. Unintentionally, it happens all the time.

Q: Have you had any conversations with any of the other department inspectors or your boss about doing this, about this procedure?

A: No, not intentionally.

Q: Okay. Um, so, you've never mentioned it to him, never talked to him about this?

A: The only inference I've ever made was that joke with Matt, is, well, you know this phone could go off and that would...

Q: Well, let me ask you this, why wouldn't you discuss it with anybody else?

A: It's nothing big. It's just not, whether it's an intentional RFI or whether it's an accidental RFI, it's not something to discuss. It just happens. It's frustrating when it happens, whether it happens intentionally or unintentionally, it's funny when it happens. Because then you have to start all over again, and it adds an hour and a half to your time. It's kind of like, uh, I don't know, when cops have to work an accident. When they hear an accident on the radio, here we go, we gotta work this wreck. Well, it's the same thing when you do dee do ee. It's like, oh, great, we have to do this all over again, because you did something stupid.

Q: Now, you said you talked about it with Matt. Have you talked about it with anybody else - this procedure?

A: No, it's not a procedure.

Q: Well, have you talked to anybody else about the fact that you have done this -

A: - no, no -

Q: - at least a dozen times?

A: No, I just joked with Matt about it.

Q: And at any of the training sessions was that was shown to you, correct?

A: Again, it might have been shown to be during the training because of the training instruments.

Q: But you at least know you've done that in training?

A: Yes, I've done it in training.

Q: Alright. And there were other agency inspectors present at the time?

A: No, no, this would be training up in Tallahassee or when we all used to get together at our monthly meetings or quarterly meetings, used to get together for our quarterly meetings, and we would do research, where we would have to do an update for the software. We had to do all the procedures. And you know, if you're doing 500 tests of something, and you, you know what I mean, you wanted to stop it, you just.

Q: Did anybody ever tell you this procedure was okay?

A: No, they never told me it was okay and they never told me it was not okay.

Q: Um, but this is a procedure you don't approve of?

A: Pardon me?

Q: But, this is a procedure you don't approve of?

A: Um, no, I like the abort idea. I should have done the abort, I don't know why I didn't. That was very silly of me.

Q: Right. But the question is, this procedure, the intentional RFI procedure, is not something you approve of?

A: No, not usually. No, not a good idea.

Q: Okay.

A: Obviously, I approve of it in those two circumstances.

Q: But, only in those two circumstances?

A: Right. Only in those two circumstances. And even now, now that I would I think about the abort, that was stupid, I should have just hit abort and done them, done them over.

Q: But you realize earlier as we were talking, you said, actually several times, I don't approve of this, I don't condone it.

A: No, generally I don't approve of it. But, see, you're making a, you don't approve of it, period so why did you do it twice. Well, because those two circumstances, I approved of it (laughing).

Q: Yeah. That wasn't my question, my question was -

A: No, generally -

Q: - it's a procedure you don't approve of?

A: No, and I should have done the abort, that's definitely. Main points, it only happened twice, it was documented, I wrote in the remarks the same thing I would have written, whether the intent was to stop it sooner, or if it was just an accidental RFI.

Q: Well, we don't know if it was two times, correct?

A: Right. Or, ough two times, or -

Q: - it was at least two times.

A: Right.

Q: Um, in fact, at least twelve. That you told me.

A: Twelve. Between, yeah, with the training instruments and what have you. And again, so what does that mean. It doesn't mean anything. It means I purposely documented exactly what I would have done either way. Exactly. Whether I hit the abort, or whether I did the radio RFI, I documented exactly the same, except for the part where cell phone too close, I should have been, I mean, intentionally cell phone too close, or. I mean, it's still, the documentation would be identical to what it is.

Q: Except that you're not documenting that it was intentional RFI?

A: That it was an intentional RFI, correct. And, it wouldn't change anything. If I were to go back to all these inspections on the, where I suspected I did it on purpose, and put in parenthesis, intentional to abort. That would fix everything, because that's exactly what that is. I mean, as in, none of this will change, everything is documented, it doesn't change anything, but the intent of, did it on purpose to start over, versus abort. Did it to start over. I wasn't hiding anything, in other words. I'm hiding the embarrassment of being stupid. But, nothing was ever left out as to the actual cause of the failure.

Q: Well, that's - that's not, not entirely true. The - part of the cause is your intent to end it.

A: Right -

Q: - with an intentional RFI -

A: Well I intended to end it because it had already failed. That's the only difference. An abort would do the same thing. If I were to hit abort, it would have been the same thing.

Q: So, it's not completely accurate that this documents the cause?

A: Well, again, if I were to stick in there, intentional RFI, versus, non-intentional RFI, it doesn't change anything.

Q: It may not, but you're statement is that they're identical, that it's the exact same.

A: Right. All I have to do is add the word intentional in front of the word RFI. That's all I would have to change. And if you want me to do that, I can back to all those ones that have it -

Q: - No, I do not suggest you do that at all. Please don't.

A: But wouldn't that be better, though. I'm not hiding anything -

Q: No, absolutely not. These are affidavits. Renee, do you have any questions?

Renee: I don't think so.

A: You understand the gist -

Q: Yeah, as you're talking -

A: That's it, nothing else in the documentation changes.

Q: Is there anything else you'd like to add, Maggie?

A: Is there anything that I can do to rectify or, you know, explain, or you want me to, ugh -

Q: - I think -

A: - you want me to nail the two that I know I did somewhere -

Q: Yes, if you can nail down the two that you know you did, absolutely.

A: Let me try and nail those down. Oh, I would like to add, you can ask any of my agency inspectors, and every single one of them will tell you, no, she never recommended using a radio or cell phone to stop an inspection. I can guarantee that. All thirty or umpteen of them.

Q: But, some would say you've done it before in front of them?

A: One of them might - Mike might say I did it, if he turned around, while I did it, and that was it. And Mike's retired, I believe.

Q: Okay, I don't have anything further.

Okay, this'll end it.