

1 to force an entry.

2 Q. So you think that he had a right to defend  
3 himself, I mean, with force necessary to kill a police  
4 officer based on the police officers' actions?

5 A. Statute 776 would agree with that statement.  
6 Yes, he would have.

7 Q. You think after 45 minutes of a standoff, if  
8 Michael Morrison was telling them get out of my yard,  
9 they don't get out of his yard, he could have killed all  
10 the police officers there?

11 A. If he did kill all the police officers, I  
12 think that he would prevail. I wouldn't wish for that,  
13 of course. But I think if you go back to 776, it  
14 specifically addresses law enforcement officers, but  
15 then says an officer conducting official duties. This  
16 officer is not conducting official duties.

17 There's no bona fide law enforcement reason  
18 why he's in Mr. Morrison's back yard. You can't name a  
19 bona fide reason. They later say, well, we're just  
20 there sort of keeping the peace.

21 Keeping the peace? What are you talking  
22 about? It's 1:30 in the morning. You're disturbing the  
23 peace. So there is no bona fide law enforcement reason  
24 why law enforcement is there. Mr. Morrison knows that.  
25 He knows that she doesn't live there. Perhaps the

1 police are a little unsure about that.

2 But this is the time where you retreat,  
3 regroup and go, how do we avoid having to kill the guy  
4 that owns the house that we're illegally in his back  
5 yard? That's not what they do, and that's the problem I  
6 have.

7 Q. I guess if we're talking prudent thing as  
8 well, wouldn't you agree the prudent thing for  
9 Mr. Morrison to have done, would have come out and said,  
10 look, I don't know why you're letting her break into my  
11 back yard but she doesn't live here?

12 A. Well, the onus of reasonableness is what  
13 prudent applies to. It's not on the part of the  
14 defendant, it's on the part of the officers. We can't  
15 rely on defendants to be reasonable, obviously. It's  
16 the officers who are trained and equipped and are  
17 following certain policies and strict laws that they  
18 have been trained to follow. They're the ones that we  
19 judge as reasonable.

20 And the definition of reasonable is a  
21 reasonable, prudent officer. That's why I use that  
22 word. So I wouldn't impose that on Mr. Morrison because  
23 there is no expectation that he should have been  
24 reasonable. There is only an expectation that he had  
25 the right to defend himself against excessive force by

1 police, and in this case this is what we see.

2 Q. Would you agree that tactically speaking,  
3 perception is reality?

4 A. Yes.

5 Q. As it relates to probable cause for law  
6 enforcement officers, what one officer knows, would you  
7 agree, is transferred to all officers?

8 A. So I'm not sure I understand your question.

9 Q. Would you say probable cause is transferable  
10 to all officers, information that one officer knows is  
11 being transferable to another officer?

12 A. Generally speaking, yes, but it also has to do  
13 with the reasonableness of that information. In other  
14 words, if an officer tells you that he has probable  
15 cause and you have time to understand the elements of  
16 that probable cause and you choose not to but go on his  
17 bad information, then I think it holds you liable as  
18 well because of the unreasonable -- I think in this  
19 case, the timeframe alone gave everyone plenty of time  
20 to sit back and calmly go over what it is they were  
21 dealing with, who it was they're dealing with, why they  
22 were there, what their angle was, the bona fide lawful  
23 enforcement reason. I think they would have settled on  
24 a very, very different strategy.

25 I would submit to you that those officers

1 involved, if this happens again, will take a different  
2 course of action because they know it's unreasonable.

3 Q. Would you agree -- I mean, your testimony, you  
4 have benefit of hindsight?

5 A. Yes.

6 Q. That -- you know, say for the sake of argument  
7 you were the officer and someone pointed a gun at you --  
8 have you ever had a gun pointed at you?

9 A. Yes.

10 Q. And did you apologize to the person and leave  
11 and walk away, or did you stay and resolve the issue?

12 A. I've never had a gun pointed at me on somebody  
13 else's property that I was illegally on, I can tell you  
14 that. And the circumstances which I've had a gun  
15 pointed at me twice, actually, I ended up responding. I  
16 shot somebody that came after me with a knife one time.

17 Again, I was on good grounds to lawfully be  
18 there. I had authority. I was doing a bona fide law  
19 enforcement investigation. Again, that's not the  
20 circumstances that we're talking about in this case.  
21 This is a -- these officers are on thin ice the minute  
22 that they show up at Mr. Morrison's house.

23 And then take that from bad to worse. They  
24 jump fences or she jumps fences, lets them in, go into  
25 the back yard. The curtilage of the house is a very,

1 very sovereign part of our Constitution.

2 Those areas are protected, and without a  
3 warrant, police officer -- the Constitution is against  
4 law enforcement. That's exactly who it's trying to  
5 address.

6 Q. Well, I mean, I understand your issue is they  
7 shouldn't have been there in the first place, correct?

8 A. Yes.

9 Q. But, again, once they're there and had a gun  
10 pointed at them, you really think they should have  
11 totally left the property after someone pulls a gun,  
12 puts it to a police officer's head and says, I'm going  
13 to kill you, you effing police officer? You think it's  
14 reasonable for them to say, my bad, and leave?

15 MR. BROSS: Object to the form of the  
16 question, assumes facts not in evidence.

17 THE WITNESS: Right. I think that we have to  
18 look at the alternative, which is to stay there and  
19 insist on a shooting. That's essentially what the  
20 officer did, arguably. When he first pulled the  
21 weapon, he didn't shoot. Not that he couldn't  
22 shoot it, he just simply didn't.

23 At this point, the officers have got to  
24 understand why they're there and what grounds they  
25 have for being there. I think a reasonable

1 officer, well-trained, prudent, reasonable officer  
2 would have to stop and say, what are we doing here,  
3 we really have no right to be here, and at that  
4 point would have removed themselves from that  
5 scenario.

6 Yes, I think absolutely that they should have  
7 retreated from that environment and not continue to  
8 force what later became a gun fight.

9 BY MR. REID:

10 Q. I mean, you said that forced the shooting. I  
11 mean, for 30 to 40 minutes, they were trying to get Mr.  
12 Morrison to put his gun down and come out, correct?

13 MR. BROSS: Object to the form of the  
14 question.

15 THE WITNESS: He did not have to come out. He  
16 did not have to put his gun down. They're telling  
17 him to do something he doesn't have to do, and  
18 you're implying he should have done that.

19 BY MR. REID:

20 Q. Say for the sake of argument, he doesn't have  
21 to come out for the domestic violence case because of  
22 the warrant. You don't think the fact that he pointed a  
23 gun at a police officer at least gave rise to the  
24 police -- a situation where the police can ask him out  
25 of the house?

1 A. They can ask him, sure.

2 Q. Force him out of the house?

3 A. No. You better have a warrant. If you're  
4 going to pull somebody out of their house, you better  
5 have a warrant. That's the point I was making. Even  
6 when they pulled the gun, if they decided they wanted to  
7 develop probable cause on aggravated assault, get a  
8 warrant. We will go in after if we need to. Have a  
9 judge sign a warrant. They don't do that.

10 Q. Again, let me give you another hypothetical.  
11 And I had this happen. I had a police officer come  
12 knock on my door. Apparently a wallet was found at the  
13 the park next door, and he was asking if I knew whose  
14 wallet it was. Kind of an odd thing for a police  
15 officer to do but he did.

16 If I came to the door with a gun and pointed  
17 at the police officer and said, get the hell off my  
18 property and slammed the door in his face, do you think  
19 he should have just walked off the property? Or do you  
20 think in that situation he should have been pulling me  
21 out of the house to figure out what the hell was going  
22 on?

23 MR. BROSS: Object to the form of the  
24 question.

25 THE WITNESS: Are you asking if I should kick

1 in your door because you pulled a gun on him?

2 BY MR. REID:

3 Q. What's the proper situation, in that scenario,  
4 if I had done that?

5 A. It happens all the time. People come to the  
6 door with guns in their hands all the time in law  
7 enforcement. If they're there and want to ask you a  
8 couple questions, they slam the door, it's time for me  
9 to leave.

10 Q. There is a difference, though, if somebody  
11 comes to the door with a gun because they don't know who  
12 you are or they come pointing a gun and said, I'm going  
13 to kill you, you MF police officer, right?

14 A. No.

15 Q. So you think if a police officer walks to my  
16 door and asks a question, I pull a gun on him, say I'm  
17 going to kill you if I ever see you here again, you have  
18 to just leave?

19 A. If a police officer comes to the door and  
20 you're standing there with a gun in your hand, which  
21 many people do all the time, especially at 1:30 in the  
22 morning --

23 Q. Pointed?

24 A. I would probably have a gun in my hand at 1:30  
25 in the morning if you came pounding on my door.

1 Q. My question, if you pointed at a police  
2 officer --

3 MR. BROSS: Object. He needs to be able to  
4 answer the question.

5 BY MR. REID:

6 Q. My question is, if you come to the door and  
7 you're pointed -- the police officer gets a gun pointed  
8 in their face; says, if I ever see you again on my  
9 property, I'm going to kill you, get off my property  
10 right now; the police officer has to just leave and let  
11 it go?

12 A. Legally?

13 Q. Yes.

14 A. Pretty much. We do what's called field  
15 interview reports. I certainly wouldn't just let it go.  
16 I would write about it, probably call a supervisor and  
17 say a weird thing happened, knocked on this door and  
18 this guy came out with a gun, pointed at me, said he  
19 didn't want me here, get the hell off the property.

20 I would be interested to know what the crime  
21 was that you had committed in your own house with your  
22 own gun when you answered the door. Arguably, you could  
23 perhaps say it was assault from the person on the inside  
24 of the house, but I don't know how shaky that probable  
25 cause --

1 Q. That's what we're alleging on Morrison is  
2 assault.

3 A. I think it's a weak case. Your case is  
4 actually better than that case I'm speaking to in terms  
5 of this case because you're there really on sort of a  
6 fact-finding mission, and it's kind of normal that you  
7 get compliance and cooperation from the community.

8 Gosh, we teach courses on community-oriented  
9 policing, where we rely on the community to say, no, I  
10 don't know whose wallet that is; and to consent to  
11 things like, can I come in and can you come out. Most  
12 of the time that is what they do. But if they choose  
13 not to, they do have a Constitutional protection to not  
14 do that, and I think sometimes we may forget that.

15 Q. Let me go back to the facts of this. You read  
16 the FDLE reports, correct?

17 A. Yes.

18 Q. All of them?

19 A. Yes.

20 Q. And they cleared the police officers?

21 A. Criminally?

22 Q. Correct.

23 A. Yes.

24 Q. Do you have any problems with the FDLE  
25 reports: Their conclusion, their opinions, their

1 findings, anything at all?

2 A. Well, I certainly can critique them for not  
3 going into enough detail to address the issue of which I  
4 addressed here today. Much of it was very small  
5 paragraphs, kind of conclusionary stuff.

6 There is an assumption that the law  
7 enforcement officers in that report, as far as I can  
8 read, were conducting a law -- this is where we forget  
9 sometimes the difference between what's called use of  
10 force and authority.

11 So when you teach the use of force continuum,  
12 for instance, which you raised the question earlier, you  
13 look at what does he do versus what do I do. That is  
14 only 50 percent of the equation. I taught classes for  
15 the last over 25 five years on this. Before you can use  
16 the continuum, you have to demonstrate that you have  
17 authority. And the authority comes, of course, from  
18 Terry versus Ohio: The reasonable belief that a crime  
19 has, is, or is about to be committed.

20 If you don't believe the crime has, is, or  
21 about to be committed, you cannot turn towards the force  
22 continuum to talk about proportional force. If you are  
23 imposing a police act on somebody in which a crime has  
24 not been at least reasonably suspected, then you cannot  
25 turn to the force continuum as a defense for your

1 actions.

2 So that's half the equation. I think that is  
3 what the FDLE report missed was it just assumed the  
4 police, because they happen to wear polyester with shiny  
5 buttons on it, were in the proper authority, and they  
6 were not.

7 As a matter of fact, as they stood outside in  
8 their uniforms, they had precisely the same authority  
9 that the neighbor next door did. They have no more  
10 right to be in the back yard than the neighbor did.  
11 They had no more authority to order Mr. Morrison out of  
12 the house as the neighbor next door did or you did or I  
13 did.

14 These officers get their authority from  
15 circumstances. They draw their authority from when a  
16 crime reasonably is, has or is about to be committed.  
17 This is a very well-established point of law, and  
18 officer are taught this, by the way. This is taught at  
19 the most basic level of the academy.

20 The officers knew or should have known that.  
21 They could not identify that a crime has, is, was about  
22 to be committed by Mr. Morrison when they violated --  
23 trespassed on his property and helped facilitate a  
24 burglary. That's the point where they should have had  
25 the maturity and perhaps the resolve to disengage, to

1 leave and say, we don't have a crime, Good Lord, I hope  
2 we don't end up in a deadly force situation.

3 So that's my critique of the report. It makes  
4 the assumption that the officers had the authority. At  
5 least it implies it. They don't specifically say that.  
6 It implies the officers have the authority, where I find  
7 there is no authority of the officers to act in the way  
8 that they do.

9 Q. And besides the fact that the FDLE report  
10 makes an assumption that the officer had a right to be  
11 there in the first place, any other issues you have with  
12 the report?

13 A. Well, that's a big issue.

14 Q. But any other issues -- I want to make sure  
15 I'm clear.

16 A. I wasn't asked really to critique that report.  
17 It was something I read just sort of as another  
18 collection of evidence. At this present moment, without  
19 us moving forward in trial, I would say that I don't  
20 recall anything about that report.

21 But if this continues, then I will verse  
22 myself more specifically on the details of what they  
23 wrote and where I thought it was perhaps flawed.

24 Q. Is that something else that you would be  
25 anticipating testifying to, about --

1           A.    Again, the police aren't on trial and so I  
2    don't think that I would testify -- but it might offer a  
3    perspective that, unfortunately, has been carried  
4    through this entire thread, which is the fundamental  
5    fruit of the poisonous tree, is that they did not have  
6    the authority to engage Mr. Morrison in what turned out  
7    to be a use of force based on proportionality; which is  
8    what they claimed, that he pointed a gun and therefore  
9    we shot. They couldn't even enter into the continuum  
10   based on the present circumstances that we're all aware  
11   of.

12           Q.    And you would agree that in some situations,  
13    maybe if the police don't start with authority, they can  
14    gain authority?

15           A.    Absolutely.

16           Q.    After he shot, any issue you have from that  
17    point forward?

18           A.    After the officer shot?

19           Q.    Yes, sir.

20           A.    I would have to look. And I haven't seen the  
21    medical reports. My understanding is the shooting was  
22    in the back. I can speak a little bit about that.

23                    There is discrepancy between whether or not,  
24    A, Mr. Morrison even had a gun in his hand at the time  
25    and, B, whether he was actually facing the officers and

1 lifting it up to head level as the officers declared.

2 Based on the forensics of where this gunshot  
3 entered, if we see shots in the back, in my experience,  
4 anecdotally -- but perhaps there is some science and I  
5 looked into that as well. We usually see the second or  
6 third shot go in the back. That's natural from somebody  
7 that gets shot facing the person, then immediately turns  
8 away from it. Usually not the first shot ends up in the  
9 back unless you shoot somebody in the back.

10 I think that's a curious question. I don't  
11 think any of us can say absolutely what position he was  
12 facing when the officer decided to shoot, but I think  
13 the forensic evidence makes some suggestions that the  
14 jury will find interesting.

15 Q. You would agree you're not a medical doctor?

16 A. No, I'm not.

17 Q. You don't have any certifications in medical  
18 anything, correct?

19 A. No.

20 Q. You're not a -- you don't have any  
21 certification in forensics?

22 A. No.

23 Q. You don't have any special training in  
24 forensics?

25 A. I've done death injury investigations. I have

1 a certificate in that.

2 Q. In your opinion, are you an expert in talking  
3 about medical wounds?

4 A. I am not, but I suspect that the defense will  
5 find one, and it would comport with perhaps my opinion  
6 as to whether or not the officer was in eminent danger  
7 of death or great bodily harm.

8 If the forensic expert says, well, he clearly  
9 couldn't have been shooting at the time, then I would  
10 add to that, that it was a no shoot.

11 Q. You would agree from your experience that  
12 people can turn and twist very quickly?

13 A. Yes.

14 Q. And, you know, a shooting happens in a  
15 fraction of a second?

16 A. Yes.

17 Q. I mean, there is lot of scenarios -- I wasn't  
18 there, obviously -- someone can pick a gun up and see a  
19 police officer pick his gun up and move a little bit  
20 before he gets shot, correct?

21 A. Yes.

22 Q. So based on the wound alone, you can't say a  
23 hundred percent what happened?

24 A. I can't say a hundred percent what happened.  
25 I think perhaps a forensic expert could suggest it with

1 more authority than I have in this position, that  
2 perhaps Mr. Morrison's version of events is more  
3 accurate based on the wound pattern.

4 His version of events is, I think, he is  
5 reaching inside the refrigerator getting something  
6 out -- I don't remember if it was a cookie or something  
7 like that -- when he was shot.

8 And so it's going to be a jury's job to  
9 compare these contrasting versions of events. And the  
10 problem for the officers, which is why I was surprised  
11 to see this case go forward, is that the officers had a  
12 lot of work in front of them in dealing with just the  
13 wound pattern.

14 If the officer is saying he was pointing a gun  
15 at me, and the defendant is saying I wasn't pointing a  
16 gun, I was facing away from you and the bullet ended up  
17 in the back, you've got a lot of work in front of you to  
18 get a jury to accept that version over the defendant's.

19 Q. Well, I mean, you would agree -- you said they  
20 might get an expert and that's fine -- as far as your  
21 expertise, you're not going to be able to testify about  
22 wound pattern or anything like that?

23 A. If their expert says this likely occurred  
24 while the subject was facing away, then I would then  
25 follow that with a use of force opinion that you have to

1 only use deadly force when your life is in imminent  
2 danger of death or great bodily harm; in other words,  
3 it's ongoing, not happened a moment ago or will happen  
4 in the future but is on ongoing.

5 So I think I would comport with the expert's  
6 finding that perhaps the determination is that the  
7 officer was not in -- the defendant was not posing a  
8 danger at the time he was shot; that it would be  
9 considered an improper shooting, excessive force, once  
10 again.

11 Q. Again, you read the FDLE findings?

12 A. Yes, sir.

13 Q. Any problems with their findings from your  
14 opinion on that aspect? I mean, you said you didn't  
15 have any other issues with FDLE that they had no problem  
16 with shooting?

17 A. They mentioned it being a bladed -- a bladed  
18 position.

19 Q. What is a bladed position?

20 A. A proper bladed position is still somewhat  
21 isosceles of your shoulders if you're shooting. Of  
22 course, if --

23 Q. Can you describe that more, isosceles of the  
24 shoulder?

25 A. Isosceles would be a squared position.

1 Q. You mind standing up and show --

2 A. I'll try to explain this the best I can.  
3 Isosceles position would be essentially feet in line,  
4 shoulders rolled forward.

5 Q. At your target?

6 A. At your target. A bladed position is still  
7 shoulders rolled forward, but your body is in a bladed  
8 position.

9 Q. One foot in front of another, just forward?

10 A. Yes, because we're protecting the firearm or  
11 we're protecting our weapons. When we approach somebody  
12 and we do an interview, we're in a bladed position. My  
13 understanding is that the shot entered through the left  
14 flank.

15 Q. Is that the fat in your back?

16 A. Yes. So if the bullet comes in through the  
17 left flank -- by the way, I think the report described  
18 it as a graze. Now I understand it went through his  
19 body, certainly not a grazing wound.

20 But in your standard position, you'd literally  
21 be shooting this way. Unfortunately, I think Mr.  
22 Morrison is right-handed, which means he should have  
23 been standing this way and the bullet should have went  
24 through here.

25 So it's a hard sell, I think, for a jury when

1 they look at the bullet in the left flank of a  
2 right-handed shooter to understand conceptually how he  
3 might have been pointing the gun at them from that  
4 position.

5 It doesn't mean he couldn't -- I've had some  
6 crazy cases. It turns out he's a Vietnam veteran as  
7 well. My understanding, he knows firearms pretty well.  
8 I can't say that absolutely he wasn't standing this way  
9 and doing this (indicating) for some reason. That's  
10 kind of what it would have taken. I don't know.

11 Q. Where is your flank? Tell me again.

12 A. I don't really know what they define as flank.

13 Q. I guess what I'm getting at, what's your  
14 understanding of where he got shot?

15 A. The left part of the torso.

16 Q. When you say torso, I think anywhere on the  
17 side --

18 A. I'm not sure. I'm actually not sure. Say  
19 from armpits to the waist.

20 Q. It's in the back area, like this part?

21 A. As I understand it.

22 Q. This is like the meaty part of your lower  
23 back?

24 A. It's a flank. I don't know. I mean, it's not  
25 a medical term. I think it's more a butcher's term as

1 far as I know. But I understood, after even speaking  
2 with the attorneys from more clarification, it's through  
3 sort of the back.

4 Q. And from your expertise on firearms as well,  
5 if you're picking -- let me start again. If you're not  
6 trained in firearms you might stand any way -- not a  
7 particular way you would always stand, correct?

8 A. I have no idea.

9 Q. I mean, I think common sense, if you give 50  
10 untrained people firearms and say shoot down the field,  
11 you're going to get a lot of different stances, correct?

12 A. You get minor variations. I actually do that.  
13 We do it with what's called a simulator. I'm not sure  
14 if you're familiar with it. I've taken many civilians  
15 with no firearms training and put them on a simulator,  
16 and they're very, very similar in the way they stand.  
17 They generally face the target and put both their hands  
18 on the weapon.

19 Q. And police are saying he's picking it up and  
20 raising it at head level, correct?

21 A. That's what he said, yes.

22 Q. So not necessarily being in your shooting  
23 stance when you're raising the gun up?

24 A. You still have the problem of being  
25 right-handed and being shot through the left flank.

1 That's still going to be a problem for the state, as far  
2 as I can tell.

3 When you're talking about this guy threatened  
4 the officer and that's why he was shot, I mean, your  
5 whole case is based on him threatening the officers, and  
6 I think that's going to be the most difficult part  
7 forensically for the state's case.

8 Q. All right. Any other issues we haven't  
9 mentioned that you have with this case?

10 A. Not off the top of my head. You did a good  
11 job.

12 Q. Any other areas you think that you would feel  
13 that you would testify about?

14 A. I have more to read. I have more to look at.  
15 At this present moment, I think I spoke about everything  
16 as I understand it. I don't think there's going to be  
17 some giant revelation of something that I don't  
18 understand at this moment.

19 But I think I'm pretty -- I've given you  
20 pretty much what you're intending to talk about if I'm  
21 asked.

22 Q. If there is some, you know, new area that you  
23 haven't mentioned, will you let us know? I mean,  
24 obviously, you know, we're doing a deposition as fact  
25 finding. If you haven't reviewed everything, I would

1 like to know.

2 A. Sure. I won't let you know, but I'll leave it  
3 to defense counsel to let you know. I'll share with  
4 him. I don't know if I'm --

5 Q. Just so -- you know, I mean, because I might  
6 want to do an another depo if there is like a whole new  
7 area you're talking about.

8 A. Yes. If it's something I go home with a viola  
9 moment and say, I didn't see this at all and nobody  
10 mentioned it in any of the depositions and FDLE didn't  
11 talk about it, I will let you know.

12 MR. REID: No other questions.

13 MR. BROSS: No questions.

14 THE WITNESS: I'll read it.

15 THEREUPON, the deposition of ROY BEDARD, taken  
16 at the instance of the State of Florida, was concluded  
17 at 12:00 p.m.

18 NOTE: The original and one copy of the  
19 foregoing deposition will be held by John Reid, Esquire;  
20 copy to A. Michael Bross, Esquire.

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WITNESS NOTIFICATION LETTER

June 8, 2016

Roy Bedard  
3057 Tipperary Drive  
Tallahassee, Florida 32309

IN RE: State of Florida vs. Michael Jon Morrison  
Deposition of Roy Bedard, taken on May 25, 2016  
U.S. Legal Support Job No. 1414889

The transcript of the above-referenced proceeding is now  
available for your review.

Please call to schedule an appointment between the hours  
of 9:00 a.m. and 4:00 p.m., Monday through Friday, at a  
U.S. Legal Support office nearest you. Please complete  
your review within 30 days.

Sincerely,

DEBORAH WARREN, Registered Professional Reporter  
U.S. Legal Support  
1364 Turnbull Bay Road  
New Smyrna Beach, Florida 32168  
(386) 423-1963

1 ATTACH TO THE DEPOSITION OF ROY BEDARD  
2 CASE: State of Florida vs. Michael Jon Morrison  
3 CASE NO.: 2012-036059-CFAES

4 ERRATA SHEET

5 I, Roy Bedard, have read the foregoing  
6 deposition given by me on May 26, 2006, in Daytona  
7 Beach, Volusia County, Florida. If any correction  
8 should be made in the transcript:

9 PAGE LINE CORRECTION AND REASON THEREOF

PAGE	LINE	CORRECTION AND REASON THEREOF
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20 Under penalties of perjury, I declare that I  
21 have read the foregoing document and that the facts  
22 stated in it are true.

23 SIGNED at \_\_\_\_\_, Florida,  
24 this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_.

25 \_\_\_\_\_  
ROY BEDARD