

TRANSCRIPTION OF THOMAS VERNER ON SEPTEMBER 6, 2007*

S Mr. ____, I'm not going to, if you want to take a deposition or do any kind of that stuff, you can do that at a later date. We are here to take your client's statement and if you are agreeing to that, he's not going to be asking any questions. I'm asking the questions today.

VA So, what is his status being here?

S He's a consultant. He's a paid consultant, a compliance consultant, for the Section.

VA Consultant as distinguished to mean an investigator?

S Correct.

VA And that's what's your representation is?

S Yes it is.

VA __ crazy.

S Well, we, I'm sure he thinks an audience, but this is consultant ____.

V ???

S I'm sure that's true, too. Okay, are we ready to go?

V I'm ready.

S Alright, sir. Can you please state your name for the record?

V Tom Verner, V-e-r-n-e-r.

S Is that your full name, sir?

V No. John Thomas Verner.

S Okay. So, what's your date of birth?

V January 30, 1944.

S What's your current residence?

V 5685 Black Oak Drive, Stockton, 95212.

Are you currently the head football coach for Franklin High School?

Yes, sir.

How long have you been in that capacity?

This will be my 14th year.

S As I stated to you, sir, we're here to talk about the transferring of American Samoan football players to your high school. ___ day with Franklin High School, when was the first time you had a transfer from American Samoa to Franklin?

V Almost every year.

DL Is that any transfer, or is that someone who transfers and then ends up playing football? I don't know if that's clear or not.

S Do you understand that I'm just asking about football players?

V Yes.

S And so almost every year you've had a kid that is transferred from American Samoa to play football at Franklin High School?

V Not to play football at Franklin High School specifically but to attend Franklin High School, yes, sir.

S Have they all played football?

V No, not all of them.

S You're the head coach?

V Yes, sir.

S Okay. Do you have any other role at Franklin High School aside from being the football coach?

V No, sir.

S You're not a teacher?

V No, sir.

S And are you paid to be the football coach?

V I am.

S Do you have any other jobs besides being the football coach?

V I do.

S What are your other jobs?

V I'm retired Bureau of Alcohol Tobacco Farms and Explosions Supervising Special Agent and now I'm a real estate developer and have been for a number of years.

S How long have you been retired from the Bureau?

V 30 years.

S I'm going to have to...

V Sure, I apologize for that.

S That's okay, it's going to happen and it's typical of this process. So, you've been retired from the Bureau for 30 years?

V Yes.

S And you've been actively involved as a real estate developer in the 30-year period of time?

V Yes.

S Do you currently have an office?

V I do.

S Where is it?

V [REDACTED], [REDACTED], Stockton, 95205. Just across the bridge.

S Okay. How long have you been at that address?

V 30 years, well, we moved from one office to another in the same complex. There was one ___ there and we're also in Nevada, but I can't think of the address in Nevada.

S Do you know what city in Nevada?

V Yeah.

S What city?

V What city are we building in currently?

S No, what city do you have an office in Nevada?

V Reno.

S How long have you had an office in Reno?

V Well, in Northern Nevada, for 10 years.

S In the last four years, who has been on your coaching staff?

V Well, it changes every year.

S What do you typically, when you have a coaching staff, you typically have an offensive coordinator?

V Yes.

S Okay. What other typical positions to you have as coaches?

V The most important coach is the offensive line coach and we have a defensive coordinator. We have what we call a skills coach and I have one person who handles all of the administrative paperwork and than another coach who handles the skill positions.

S So, you have a skills coach? Is that the one you were talking about that handles the skills position?

V Yes.

S So, you have an offensive coordinator, an offensive line coach, a defensive coordinator, a skills coach, and an administrator?

V Right.

S Does that cover all of your positions that you typically have on your staff?

V Yeah. We're not counting stat takers and junk like that.

S No, we're not going to talk about those specifically right now when I'm asking ___ questions. Who has been your offensive coordinator?

V Me.

S Okay.

VA This is the last four years?

S In the last four years, yeah?

V Well, we're going above and beyond the statute of limitations here.

S Actually, that is true. Why are we, let's talk about then the last three years. I mean...

V I'll only go two.

VA The statute of rules says two years.

S Well...

VA Which also leads me to ask you, I don't know why you want to know about his real estate development. Why _____?

S Let's try and get this thing done. The offensive coordinator for the last two years has been...

V Me.

S Did you ever have anybody besides you as your offensive coordinator?

V No.

S Who's been the offensive line coordinator for the last two years?

V Jackson Embrosia.

S How long has he been your offensive line coach?

V ___ years.

S Who was the coach before that in that position?

V Jeff Seumaala.

S Who is your current defensive coordinator?

V Jeff Seumaala.

S How long has Jeff Seumaala been on your staff as a coach?

V Four years or five years, I'm really not sure.

S Who is your skills coach?

V Ed McCullough.

S How long has Ed been on your staff?

V Two years.

S Who does the administration?

V Gary ____.

S With regards to these coaches you've named, Jackson, Jeff, Ed, and Gary, are they paid by Franklin High School to be coaches?

V Yes.

S Do you pay them to coach?

V No. They're paid by the school district.

S Alright. Has Jeff's brother, Steve Seumaala, ever been a coach?

V No.

S Does Steve come out to your practices?

V He has, yes.

S And when he has in the past, he's come out, has he been at your practices this year?

V No.

S When was he last at your practices?

V He might have been came out and watched, you know.

S Has he ever participated with regards assisting coaches doing drills?

V No.

S Is he down on the field during football games with the coaches in uniform for games?

V Yeah.

S He is?

V He helps with water, yeah.

S Okay. How long has he been doing that?

VA Helping with water?

S How long has he been down on the field during games with a coach's uniform on?

V I don't remember him being in a coach's uniform.

JM Can I interject, they didn't have coach's uniforms last year, this would be the first year ____ coaches have them.

S Okay, but he's been down on the field in some capacity during games for how long?

V A couple of years.

S Aside from being down on the field helping with water during games, does he do anything else?

V No. He's around.

S Do you know what he does for a living?

V He does duct work, but he's been disabled, so I think that's, I don't know. I don't know; that's a fair statement.

S You said at some point he did duct work?

V He does, yeah.

S For HEAC Company?

V Right.

S Do you know which company?

V No, I think he works for a guy who owns a tremendous number of rental units and...

S Do you know who that guy is?

V Mark Williams.

S Do you know Mark Williams at all?

V Yes, I do.

S How do you know Mark?

V He used to be on our coaching staff.

S When?

V Not this year, but the preceding two or three years.

S And what positions did he coach?

V None.

S He was just on the coaching staff?

V ____.

S Was he let go?

V Yes. He was more on the coaching staff because he has an identity ___ with some of his ___ ethnic ___ diversity ___.

S What happened then?

V ____.

S Sir, have you ever been to American Samoa?

V I have not.

S Do you have any friends who were born in American Samoa?

V Jeff Seumaala. Wait a minute, I don't know if Jeff was born in American Samoa or not. I'm assuming that he was.

S Okay. Is Jeff the only one you would say is a friend that you believe was born in American Samoa?

VA Actually, he said he didn't know if he was born.

S That's what I said.

V I don't know if he was born there or not. I don't know anybody else who was born there other than the kids who would come over to play football.

S Right. How long have you known Jeff?

V For four or five years.

S How did he come to be a coach for you?

V Initially, his brother played for us and you have to understand the Samoan, if you come out to our football practice today, there will be ten Samoans there. They'll just be up there, be up in the bleachers and you never talk to them and they don't to you. Jeff's brother played for us.

S I'm sorry, sir, what was his brother's name?

V [REDACTED] Seumaala.

S Did [REDACTED] start playing for you before Jeff was a coach?

V Yeah.

S Did [REDACTED] play more than one year for you?

V I think he played two, but I'm not sure.

S Do you know if [REDACTED] came from American Samoa to play?

V I don't know.

S Do you know if [REDACTED] had played football in American Samoa before coming to Franklin High School?

V I don't know.

S Did [REDACTED] complete his football career with you before Jeff became a coach?

V Yes, I believe so.

S Do you know what Jeff does?

V Yes.

S What does he do?

V He is a computer guy at the __ State Bank. I don't know what his title is, I just know he's a computer expert.

S Have you ever been told, strike that, have you ever talked to Jeff's mother?

V Yes.

S Do you know what her name is?

V Manu.

S It's Manu Seumaala? Manu Seumaala?

V Manu Seumaala.

S Seumaala?

V Yeah.

S I'm going to mispronounce names. I'm not trying to do so.

V My feeling was you were going to ask me how to spell Jackson Embrosia's last name.

S When, have you met Manu in person?

V I have.

S When did you meet her?

V About 20 years ago.

S What were the circumstances?

V Her brother was receiving his Master's degree from the University of the Pacific.

S What's her brother's name? Is it Bob Tuiasosopo?

V I'm drawing a blank.

S Do you know what his last name is?

V I think it's Tuiasosopo.

S And, how is it that, was her brother a friend of yours?

V Yes.

S Were you getting your Masters at the same time?

V No. We were coaching together at St. Mary's High School and while we weren't coaching on the same levels, I attended the celebration of him getting his Master's degree and she was there.

S Okay. My understanding, let me make sure on this, the person that was graduating from U of P 20 years ago when you met Manu, you don't know his first name is Bob, correct?

V It was not Bob.

S Do you know what it was?

V I'm drawing a blank.

S Is it Richard?

V I don't know. Tui.

S You called him Tui?

V Yes.

S Do you know where this person is coaching now or did he become a coach?

V I think he's coaching at the University of Arizona.

S Do you know somebody named Bob Tuiasosopo?

V I do, yeah.

S Who is the person you know as Bob Tuiasosopo? Who is that person?

V He's Samoan.

S And is he related to Manu?

V I think so.

S Do you know how?

V Probably his brother.

S But you don't know...

V I don't know, I don't know that. Samoans are all related.

S I'm going to ask you some questions about some specific football players.

V Sure.

S Okay. Do you remember how you first learned about [REDACTED]?

V That's beyond two years.

S So, you're not going to answer that question?

VA He's not going to answer any questions over the past two years.

S And why is that?

VA It's beyond the rules provided by two year statute of limitations, that's why.

S With regards...

VA I don't need to take a look at it, but understand that this is a voluntary thing and frankly I think it would be very generous to answer, so far, I think 97 percent of your questions about enrollment, but I'm giving you the courtesy of answering them. I'm not going to answer about anything that happened over two years ago. If that's not acceptable to you, you need to do whatever you're going to do.

S That's fine. I just want to say, I want to make sure that you are not going to answer a question based on the issue that it's the statute of limitations.

V Yes.

S That's your...

V Yes.

VA It is not relevant. It cannot lead to relative evidence and it's basically, almost in the form of harassment.

S What about [REDACTED]? Same thing?

V Beyond two years.

S [REDACTED]?

V He's here.

S Okay. Let me just make sure on [REDACTED]?

V Beyond two years.

S [REDACTED]?

V Beyond two years.

S [REDACTED]?

V I don't remember him.

S [REDACTED]?

V [REDACTED]?

S Yeah, [REDACTED]?

V I'll answer any questions on him because it was last year.

S When did you first find out that [REDACTED] was coming to Franklin High School?

V Don't know.

S You didn't hear anything about that before?

V No.

S Did you ever have any conversations with anybody from American Samoa telling you that [REDACTED] was coming to Franklin High School?

V No.

S How was it that you first found out about it? What were the circumstances?

V Well, he obviously had been a student at school and probably came to the weight room when we advertised football tryouts. I'm guessing at that, but that...

S You don't remember?

V Well, I do remember that he was enrolled in school and subsequently showed up in the weight room.

S Had anybody asked you to take any steps to ensure that [REDACTED]'s eligibility requirements had been met?

V What do you mean?

S Did anybody ask you to make sure that [REDACTED] could play football, that is if he was eligible to play football?

V His academic eligibility?

S Any kind of eligibility, academic...

V No. I'm sure that I checked his academic eligibility.

?? Actually, Tom, if you're sort of surmising or something, you might want to say that. If you remember specifically, you might want to say it. It sounds like you don't remember specifically.

- V The only thing I can say is every kid who comes out in weight training, some way, some how, I check to make sure he is academically eligible.
- S What about transfer students? Do you make sure that those transfer students have met their appropriate eligibility requirements for the CIF?
- V No, that's not my job.
- S Who's job is that?
- V I couldn't do that if I wanted to. Joe Martin's job.
- S Did Joe ever ask you about the eligibility of [REDACTED]?
- V No. Not that I recall.
- S Did he ever ask you to take any steps to find out whether or not [REDACTED] had played football the previous year back in Samoa?
- V No.
- S Did you ask Mr. Martin to take any steps to find out whether or not [REDACTED] had played football in American Samoa?
- S No, and here's, no look, I've been tolerant to allow people that are, Mr. Martin doesn't have a right to sit in here, but I'm going to let him in here, but you can't talk during this...
- VA Well, the whole process is faltered and you can talk if you remember something or you don't remember something, you know, you can answer that question. I think, maybe we'll just hold off, as I'm sure they'll object if there's something, so...
- ?? It seems to me though that what we're trying to do is to find out the truth and if Mr. Martin has something of value, he should be able to state it. I disagree with your comment as who you are allowing or not allowing in this room. Everybody is here in this room on a voluntary basis, so why do you have any right to tell anybody that they can't be here?
- S Because if they interfere with my processes getting down a statement from somebody, including interrupting me when I'm trying to ask questions, than that is interfering with the process, which they're not allowed to do.
- ?? The problem is there is no definition of what this process is. You guys have decided to do whatever you decided to do. You haven't told us or me or ___ anybody anything of specificity. No allegations have been made.
- S Well, who are you to be told that in the first place?
- ?? Well, who are you to be conducting an investigation in the first place?
- S I'm representing CIF Sac-Joaquin Section and we are investigating Franklin High School.
- ?? I'm representing Franklin High School. Well, the remark was made in this situation, that could be anybody.

S Well, sir, actually, it's not. You just want to characterize it that way. You are not representing Franklin High school. You're not even representing the district. You are representing Mr. Verner. Mr. Verner's just being asked questions here today. So, you can keep making remarks and what you're doing is your interfering with the process.

?? Well, if that's how you feel, that's how you feel, but...

S I'm just asking right now while we're talking.

?? And Mr. Martin had something that he thought was of value.

S Mr. Martin's statement has been taken and we can put him back on the record afterwards if he wants to clear something up.

?? And typically, if you are talking about a formal ___ in procedures such as a deposition or any kind of a court proceeding, you are 100 percent correct. I guess I have the illusion that somebody wants to find out what really happened and wants to know the truth. I guess that's not correct.

S Mr. Verner, let's get back to what we were talking about here. Did you speak to Lewis at any point and ask him any questions about his past football experience at American Samoa.

V I don't recall that.

S Is that something that you normally do?

V I would certainly think that I did.

S I want to make sure, to caution you myself on this, I'm not, just because you might think you did, what I'm asking, that was a specific question about your own procedures with ever student that is a transfer, so I'm going to ask it again. With every student that's a transfer, do you find out from them personally what past experience they had in regards to football?

DL That's a confusing question. Are you asking him as general practice, is that what you're trying to ask?

S Yes.

DL ___ if you have a general ___.

S Okay, so what steps do you take generally? What do you normally do?

V Well, I mean, let's say you transfer to Franklin High School, okay, and you came into the weight room and you said you were a football player, you wanted to play football. I would ask you if you ever played football before, and I would probably ask you what position you played before.

S Do you remember asking this question to [REDACTED]?

V No, I don't specifically remember asking him that, but that's the general practice.

Once you find out that a student has played, let's strike that. Do you take any steps to find out where the students that have transferred are living?

V No.

S Do you know where [REDACTED] was living?

V No.

S Do you know where [REDACTED] was living, or is living?

V I don't know where he was living when he transferred in.

S Do you know who he's living with?

V Now?

S Yes?

V Yes.

S Who's he living with?

V Gwendolyn Seumaala.

S Who's that?

V His guardian.

S Is Gwendolyn related in way to Jeff?

V Sister-in-law, I believe.

S Is she married to Steve?

V She is. I ___ who she was married to.

S Do you know where Gwendolyn and Steve and [REDACTED] are living?

V On A [REDACTED] Street.

S Are any other student-athletes living with those people?

V Yeah, the people you asked about. Gwendolyn Seumaala is their court-appointed guardian.

S Has she been the court-appointed guardian of every American Samoan transfer?

V No.

S How many?

DL It's unclear as to what period of time that question was about and who we were talking about, so I don't think the question is very clear.

Which three?

V [REDACTED] and [REDACTED].

S [REDACTED] and [REDACTED]?

V And [REDACTED].

S Okay, [REDACTED]. Do you know why she is their court-appointed guardian?

DL Don't guess about something you don't know, Tom.

V I'm not going to guess.

S I would take that as any question that I ask, so that's a normal...

V My guess is not the issue here. If they want to tell you their family circumstances, they can tell you, I'm not going to tell you.

S Do you know?

V I know, yes.

S But, you're not going to tell me?

V Well, I mean, is this an adversarial proceeding or are we trying to do the right thing here?

S I'm just trying to get...

V —

S Are you going to tell me or not? If you're not, that's fine?

V I can tell you a kid that has had no father, raised by his grandmother and grandfather, the mother with so many children that she can't feed them, and he's related to her and they moved, the grandparents moved here with him and then he gets, so he stays with Gwendolyn.

S Which one are we talking about when you said all that? [REDACTED]?

DL It's sort of, I think it's a question of what Tom's concerns are, some privacy concerns, and they think maybe you can get what you are asking for. If you are asking about undue influence, you know, whether ____, something like that, but I think the concern is the private lives of these kids.

V Well, the bigger issue is they tell me something in confidence. I'm not going to sit here and have them come in here and then you know all this and they go, well, hell, this Verner, he's not...

S You're right, this is a voluntary proceeding. You don't have to answer my question. I just want to make sure...

V Don't get adversarial, come on, this is not a deposition. Is this a search for truth and facts or are you doing... this ain't an O.J. Simpson case, come on, please. I'm trying to be cooperative.

S My question is that, how long has Gwendolyn been the guardian for these three individuals?

I don't know.

Was Gwendolyn ever a guardian for any other American Samoan football players that played for you?

V No.

S Okay. Who did [REDACTED] live with?

V I don't know.

S Did [REDACTED] live with Jeff or Steve Seumaala.

V I don't think so.

S Did [REDACTED] live with either of those two individuals?

V I don't think so.

S What about [REDACTED]? Did he live with either Jeff or Steve?

V I don't know.

S Do you know if any of your football players have lived with Jeff or Steve?

V You don't understand ____, so...

S I don't understand what sir?

V These Samoans, we're all brothers. Samoans live with, they live here, they live there, there live here, they live there. It was ____ and the only thing I __ relate it to is when my parents relocated from Southeast Texas to California, in those days, we had Sunday dinners and we would stay at an uncle's house unannounced, cousins stayed with cousins, all that. Samoans have that steep family tradition.

S Okay. My question still is...

V I'm an outsider too, so.

S But my question is, do you know if any of your American Samoan Football players lived with Jeff or Steve, besides [REDACTED], [REDACTED], and [REDACTED]?

V I don't think so, no. I don't think they lived with them.

S Have Jeff or Steve...

V I don't know, let's get that cleared up, as a, on a temporary basis, I'm sure there's ____.

S I'm not talking about a temporary basis. I'm talking about whether or not, more than a month...

V Then the appropriate answer is no, I don't know.

S You said that you first met Eleimanu, Manu, about 20 years ago?

V About, yeah.

S Have you met her since?

V Yes.

S When did you meet her next, after the 20 years, when did you next meet her?

V I probably saw her within the last two years.

S Under what circumstances?

V She was here and her husband was being treated for his heart disease that was his demise. And she is Jeff's mother, Seumaala's mother.

S Have you ever spoken to her about contacting football players in American Samoa to come play at Franklin High School?

V I don't think so, no.

S Have you...

V Definitely, no.

S Do you know if Jeff has?

V You would have to ask Jeff that. I don't know.

S I know, I will ask Jeff that, but I am asking, based on your conversations with Jeff, have you learned that Jeff has had his mother contact American Samoa players?

V No.

S Do you know if Jeff has contacted American Samoa players while they are in American Samoa?

V Do I know?

S Yes, sir.

V No.

S Have you ever made any calls to American Samoan football coaches?

V No.

S Anybody from American Samoa about American Samoa football players? Have you contacted anybody in American Samoa about American Samoan players?

V In the last two years, no.

S So, you're not going to answer that question beyond the two years?

V No.

S Okay.

V But I will say for the record, I don't know any coaches in American Samoa.

S Well, my question was initially the coaches, but I'm asking have you ever contacted anybody else besides a coach in American Samoa. It's a different question about football players over there.

V No, I wouldn't know who to call.

S Did you meet with any of the American Samoan football players when they transferred to; let me ask you this question. Are you aware of any football players that have transferred from American Samoa to Franklin High School who played more than their senior year here?

V Yes.

S Who?

V Well, [REDACTED] and [REDACTED] others.

S Can you tell me their names?

V No. [REDACTED]. The others, I can remember.

S Do you understand, have you ever understood why you've had so many or a number of American Samoan football players transfer over after their junior year's are completed?

V Yes.

S Why is that?

V Because I think the families over there save up and save up and save up and the dream is to get to the United States to play football. Having said that, we probably, we certainly don't get as many football players from Samoa their senior year as Grant High School, Elk Grove High School, Long Beach Poly, Palo Alto High School, the big one in Los Angeles, _____.

S Did you personally pay for airfare for any of the American Samoan students to come here?

V Definitely no.

S What about for their parents?

V Definitely no.

S Did you arrange for their air travel?

V No.

S Do you know if Jeff did?

V I don't know.

S Do you know if Steve did?

V I certainly don't know that. I don't talk to Steve enough.

S I'm not trying to be adversarial, but I want to make sure my record's clear.

V Sure.

S Do you know whether Jeff or Steve paid money to have the airfare paid for any of the students or their families to come out from American Samoa?

V I don't know.

S Do you know if Jeff or Steve picked up any of the families from American Samoan football players and transferred them to Franklin High School and some of the hotels in Stockton?

V I don't know.

S Do you use L&L Travel?

V No.

S Have you ever used L&L Travel?

?? Is this saying personally or is this a school ___?

S In person.

V You mean in the last two years?

S Yeah, in the last two years.

V No.

S Have you ever used any travel agency to have Samoan workers come out here?

V No.

S Did you ever talk to the parents of [REDACTED] about having a portion of their airline transportation paid for graduation?

V Never talked to them.

S You don't recall talking to the parents at all?

V No.

S Sir, do you own [REDACTED] Street?

V I do.

S Have you had, is it a rental?

V It is.

S Who is renting it from you?

V Gwendolyn Seumaala.

S What about [REDACTED] Avenue?

V I've never heard of that.

S Do you believe that any former Franklin High School football player that transferred from American Samoa has a grudge against you?

?? Not going against public opinion and speculation.

- V I don't know.
- ?? I guess the question is __ do you have that belief?
- V Yeah, probably.
- S Who?
- V [REDACTED]
- S What do you think Eric Taifane has against you?
- V He was totally helpless. He's poor playing football and I know his older brother played at Fresno. He was really upset with, not with me, but with his brother _____.
- S Is there any reason that he or any other former Franklin High School student who transferred from American Samoa might not be too thrilled __ circumstances _____?
- V Probably.
- S Who would that be?
- V I don't know. They want to get here so badly that I don't know.
- JM When I first came here in 06, last fall, there were three kids that who transferred him that you didn't know and I didn't know that they played varsity football in Samoa before. Certainly had __ rules of CIF. Then we didn't know if my experience with American Samoan community. In Samoa, they don't always __, but football was rugby. They don't always say let's watch some TV, because there's a lot of places throughout __ not sure if this was jv, varsity, or professional program. And I'm not sure if he thinks __ conversation, I think __ conversation, but nevertheless, I did contact as I stated Samoa and find out if those kids played varsity football. The response on the letterhead was from whoever that lady is, that they played rugby. The other one was, I did get contacted by coaches. I brought my cell phone when I was in Seattle. It said 707. The conversation I had with the lady identified herself as [REDACTED]'s mother who is a player who was here from American Samoa. She was asking me about Jeff and she talked about the hate mail __ while I was in Seattle. My response to her was that I would look into it as I do with anybody and I contacted the coach. I did teach _____ this is Pete Saco gone through this. Pete's comment to me that I was possibly misled by somebody in Samoa. I remember Pete saying that. __ told about the 510s, 214s and _____.
- S Did you talk to somebody in Samoa?
- JM Yeah, I talked to Bob Tuiasosopo.
- S Anybody else?
- JM That's the only person I can remember talking to.
- DL And you talked to Claire earlier?
- JM Yeah, Claire. That was an earlier conversation. None of, often a number of coaches _____ way down there still ____.
- S I don't remember asking that question.

?? Yes, you did.

S Well, I'm not asking whether it was required to, I'm asking if you knew.

?? Yeah.

JM ___ coach ___, that's the responsibility. Tom knows that my responsibility is to oversee all of the athletics and make sure that the kids are eligible, but site principals are the final say on the eligibility of their kids who participate to decide their eligible. I hope that clears all that up.

?? And the Samoan community, Tom brought up, I thought I did.

V I know.

?? ___ very personal.

?? They do.

JM Hopefully, you guys are going to take into consideration the specifics, as well as the general culture of Samoa, and it's absolutely one night I'm sleeping here and the next night I'm moving there. So, if you start saying where they lived, especially if he can't, those Samoans who immigrated over here, that could get real ambiguous. You're going to find that anywhere you go in the Samoan community.

?? I think one thing important, they don't even have an address. They don't understand the concept of addresses.

JM Or PGE files or any of that stuff. Ultimately, the CIF is going to be cognizant of the characteristics of this ethnic group. I would certainly hate to see ___ be isolated in an investigation because of their ethnic background. We have not mentioned this in any of these conversations, Native Americans, Hispanics, Cambodian, Laotians, Southeast Asia, Phillipinos, which are a wide range of extensive transfers into this district. All the time, all different schools. I guarantee as a private citizen, I have some deep concern about the racial identity of these kids and being isolated and identified as a single ethnic group.

S Anything else?

JM That's it.

S = Scott Donald

V = Tom Verner

VA = Verner's attorney

DL = David Lyon

JM = Joe Martin

[*This transcript is a good-faith effort to determine the actual words used in the interview. Due to the speech volume or dialect of the person being interviewed, the noise in the background, and several persons talking at once, this transcript contains the information that is discernable from the recording that could be supplemented as an infrequent basis by the interview notes of Chuck Smrt.]