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IN THE CIRCUIT COURT OF THE
11TH JUDICIAL CIRCUIT IN AND FOR
MIAMI-DADE COUNTY, FLORIDA

CASE NO.: 12-41600 CA 22

JOHN M. BENNETT and
NANCY L. BENNETT,

Plaintiffs,

vs.

MORTGAGE ELECTRONIC REGISTRATION
SYSTEMS, INC., HOME LOANS ALLIANCE, LLC,
f/k/a LEVERAGE FINANCIAL, LLC, d/b/a
LF LOANS, JAMAL M. WILSON and GTE
FEDERAL CREDIT UNION,

Defendants.

_____ /

June 24, 2016
Friday - 11:50 a.m.
4649 Ponce de Leon Boulevard
Suite 402
Coral Gables, Florida 33146

TRANSCRIPT OF THE DEPOSITION

OF

JAMAL WILSON

TAKEN ON BEHALF OF THE PLAINTIFFS

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APPEARANCES

REX E. RUSSO, ESQ.
Attorney for Plaintiffs
2655 LeJeune Road, PH 1-D
Coral Gables, Florida 33134

SCOTT J. FEDER, P.A.
By: Scott J. Feder, Esq.
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Suite 402
Coral Gables, Florida 33146

ALSO PRESENT

John M. Bennett
Nancy L. Bennett

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1 THEREUPON:

2 JAMAL WILSON

3 a Defendant in the above-styled cause, having been first
4 duly sworn, deposes and says on his oath as follows:

5 DIRECT EXAMINATION

6 BY MR. RUSSO:

7 Q. Please state your full name.

8 A. Jamal Malek Wilson.

9 Q. And what is your capacity with LF Loans?

10 A. I no longer have anything to do with it. I
11 sold the company.

12 Q. Did you ever?

13 A. Yes.

14 Q. What was your capacity with the company?

15 A. Managing partner.

16 Q. How many other managing partners were there?

17 A. Just me.

18 Q. And when was LF Loans formed?

19 A. I don't remember the exact date.

20 Q. Give me an approximation, how many years ago?

21 Or if you know the year.

22 A. I believe the year was 2006.

23 Q. And when did it cease operations?

24 A. From my knowledge, it hasn't.

25 Q. Somebody bought you out?

1 A. Yes.

2 Q. You were bought out by your partner or
3 somebody else?

4 A. Someone else.

5 Q. And what is your capacity with GTE Federal
6 Credit Union?

7 A. I have none.

8 Q. Are you here today in any capacity as their
9 representative for the deposition?

10 A. Correct.

11 Q. You have no association with them, but you're
12 here today in a capacity representing them for the
13 deposition.

14 A. Correct.

15 Q. Have you ever been employed by GTE Federal
16 Credit Union?

17 A. Yes.

18 Q. In what capacity?

19 A. I was managing partner of Home Loans Alliance,
20 which was partly owned by GTE Credit Union.

21 Q. Are you presently employed by GTE Credit
22 Union?

23 A. No.

24 Q. Are you an officer or director of GTE Credit
25 Union?

1 A. No.

2 Q. Are you an independent contractor presently
3 with GTE?

4 A. No.

5 Q. Then in what capacity do you believe you are
6 able to be here today representing GTE Federal Credit
7 Union?

8 MR. FEDER: He's been designated as the person
9 with the most knowledge of the facts regarding this
10 case; and we advised previously, in response to your
11 notices, that he would be the representative.

12 MR. RUSSO: Yes. Alright, that's something
13 for another day perhaps, or perhaps not.

14 (THEREUPON, A LETTER WAS MARKED "EXHIBIT 1"
15 FOR IDENTIFICATION.)

16 Q. (BY MR. RUSSO) I'm going to show you a
17 document and ask you if you recognize this. It's marked
18 Exhibit 1 for identification.

19 Have you seen that letter before?

20 A. Yes.

21 Q. And you received a copy of this letter
22 directly at LF Loans?

23 A. I don't recall.

24 Q. The correct name for LF Loans is Leverage
25 Financial, correct?

1 A. I'm sorry, say that again.

2 Q. The correct name for LF Loans is actually
3 Leverage Financial?

4 A. Both names.

5 Q. Was it a corporation, an LLC?

6 A. An LLC.

7 Q. Were you at the closing on this loan?

8 A. No.

9 Q. Were you any part of preparing the closing
10 package?

11 A. No.

12 Q. Who prepared the closing package?

13 A. The closer in our office.

14 Q. And that would have been whom?

15 A. I don't know.

16 Q. You say your office, you're talking about
17 Leverage Financial.

18 A. Correct.

19 Q. And how many closers did Leverage Financial
20 have in the office?

21 MR. FEDER: Form, predicate.

22 A. At the time at least five.

23 Q. And are the records on those employees still
24 maintained by you or only by the entity that now owns --

25 A. I don't maintain any records.

1 Q. From LF Loans.

2 A. No.

3 Q. Do you know if the other individual that
4 was -- well, you said you were the only owner of LF Loans,
5 correct?

6 A. Correct.

7 Q. And who owns it now?

8 A. GTE Credit Union.

9 Q. So GTE Credit Union bought out LF Loans.

10 A. Correct.

11 Q. Do you know if, when the closer prepared the
12 closing package, that at the time it was first prepared
13 and sent to the closer, that it in fact contained a copy
14 of the document that's attached to this letter, being the
15 Payment Letter to Borrower?

16 A. I'm sorry, could you repeat the question?

17 Q. At the time that the closing package was
18 prepared and sent to the closer, was this document, that's
19 attached to the letter that was previously identified,
20 part of that closing package, this Payment Letter to
21 Borrower?

22 MR. FEDER: Object to form.

23 Go ahead.

24 A. I don't know.

25 Q. Did you ever witness the signatures that are

1 on this document, Payment Letter to Borrower?

2 A. No.

3 Q. Do you know who might have?

4 A. No.

5 Q. Who is Stewart Title?

6 A. The title company that closed that loan.

7 Q. And they were chosen by LF Loans?

8 A. No.

9 Q. They were chosen by GTE?

10 A. No.

11 Q. They weren't chosen by GTE. Who chose
12 Stewart?

13 A. I don't know.

14 Q. So it might have been GTE, or it might have
15 been LF Loans that designated Stewart Title to be the
16 closer, correct?

17 A. I don't know. I couldn't say exactly who
18 chose them.

19 Q. Do you know whether or not there is any action
20 pending by either LF Loans or GTE, which I'll just say for
21 short for GTE Federal Credit Union, against Stewart Title?

22 A. I don't know.

23 (THEREUPON, AN EMAIL WITH ATTACHMENTS WAS
24 MARKED "EXHIBIT 2" FOR IDENTIFICATION.)

25 Q. (BY MR. RUSSO) Show you another document,

1 which is marked Exhibit 2 for identification, and ask you,
2 please, if you recognize this document.

3 MR. FEDER: Are you representing the
4 attachments?

5 MR. RUSSO: And attachments.

6 A. I recognize this email.

7 Q. Did you send that email?

8 A. I recognize this first page of the email. The
9 other subsequent pages, I don't know.

10 Q. You don't know if those are the attachments or
11 not?

12 A. I don't, no.

13 Q. And you prepared that email?

14 A. Yes, this first page.

15 (THEREUPON, AN EMAIL WAS MARKED "EXHIBIT 3"
16 FOR IDENTIFICATION.)

17 Q. (BY MR. RUSSO) Let me show you now what's
18 been marked as Exhibit 3 for identification and ask you
19 the same question, whether or not you recognize the
20 document.

21 A. I'm sorry, what was the question?

22 Q. Do you recognize the document?

23 A. Yes.

24 Q. And you prepared that email?

25 A. Yes.

1 Q. In this email, it states that, I'm reading
2 here, "We are taking every step to remedy the situation
3 and have taken legal action against the title company in
4 question." When you said, "we," who is "we"?

5 A. My company.

6 Q. LF Loans.

7 A. Correct.

8 Q. And you said, "remedy this situation." What
9 was the remedy that you had in mind?

10 A. I don't remember what my thought process was
11 when I wrote that email.

12 Q. And then you conclude, "and have taken legal
13 action against the title company in question." What legal
14 action was taken against the title company?

15 A. I meant I called my attorney.

16 Q. And who would that be? Who was your attorney?

17 A. Arthur Corrales.

18 (THEREUPON, AN EMAIL WAS MARKED "EXHIBIT 4"
19 FOR IDENTIFICATION.)

20 Q. (BY MR. RUSSO) Same question, Mr. Wilson, I'm
21 going to ask you if you recognize this document.

22 A. Yes.

23 Q. And you prepared that email?

24 A. This second page is from the other one?

25 Q. Yes.

1 MR. FEDER: You're referring to the final
2 email.

3 MR. RUSSO: Of Monday July 30th, at 9:42 P.M.

4 A. Okay, yes.

5 Q. In this email, you stated that the MI -- that
6 means mortgage insurance?

7 A. Correct.

8 Q. That the mortgage insurance portion of their,
9 meaning the Bennetts, monthly payment will be returned and
10 removed from any future payments. Do you know if in fact
11 it was removed from the August payment?

12 A. I don't know.

13 Q. Do you know if it was removed from the
14 September payment?

15 A. I don't know.

16 Q. Well, who was taking care of that? Who was
17 following up with that?

18 A. GTE, they were the servicing company.

19 Q. So who actually saw to any correction, if
20 there was one? That was GTE's responsibility?

21 A. No. We sought the correction, but GTE was the
22 servicer so we couldn't access funds through or their
23 payment process.

24 Q. So only they could follow up on it then.

25 A. Correct.

1 Q. And did you call them to follow up on it?

2 A. Yes.

3 Q. And what did they tell you?

4 A. That they would be rectifying the situation.

5 Q. Did they say when they rectified it?

6 A. I don't remember.

7 Q. How many times did you call them?

8 A. I spoke with them, and they said they would
9 rectify it. I don't know if that was one or two times,
10 but they told me that they would correct the situation.

11 Q. Did you keep any notes or other log on your
12 calls to GTE?

13 A. No.

14 (THEREUPON, AN INITIAL ESCROW ACCOUNT
15 DISCLOSURE STATEMENT WAS MARKED "EXHIBIT 5" FOR
16 IDENTIFICATION.)

17 Q. (BY MR. RUSSO) Show you now another document
18 and ask you the same question, whether or not you
19 recognize the document.

20 A. No.

21 Q. Have you ever seen it before?

22 A. I don't believe so, no.

23 Q. Do you know what it is?

24 A. It says: "Initial Escrow Account Disclosure
25 Statement."

1 Q. Do you know who prepared it?

2 A. No, I don't.

3 Q. Would it have been somebody employed by LF
4 Loans that prepared that, or GTE?

5 A. I don't know where this came from, so I don't
6 know.

7 (THEREUPON, A HUD-1 STATEMENT WAS MARKED
8 "EXHIBIT 6" FOR IDENTIFICATION.)

9 Q. (BY MR. RUSSO) I'm going to show you now
10 another document, which has been marked Exhibit 6 for
11 identification, and ask you if you recognize that
12 document.

13 A. Yes, the HUD-1 Statement.

14 Q. So you've seen the HUD-1 before in this case
15 for the Bennetts?

16 A. Yes.

17 Q. And who prepared the HUD-1 Statement?

18 A. The title company.

19 Q. It's not part of the closing package that
20 would have been sent to the title company?

21 A. No, title companies create HUD-1 Statements.

22 Q. So you believe Stewart Title then created
23 that. Correct?

24 A. Here, where it says, "Settlement Agent," it
25 says, "Stewart Title," yes, it appears so.

1 Q. Settlement agent and closing agent same thing?

2 A. Correct.

3 Q. And also attached here is another Payment

4 Letter to Borrower. Do you see that?

5 A. Yes, I see this letter.

6 Q. Do you know who prepared that letter?

7 A. I don't know.

8 Q. Would that have been somebody in your office

9 preparing the closing package, or would that have also

10 been Stewart Title?

11 A. A Payment Letter would be part of the closing

12 package, but I don't know who prepared this particular

13 Payment Letter.

14 Q. It would have been somebody at LF Loans or

15 somebody at GTE?

16 A. If this was part of the package that LF Loans

17 sent, then it would be someone at LF Loans.

18 Q. And there is also attached here a document

19 that says, "Federal Truth and Lending Disclosure

20 Statement." Same question, do you know who prepared that

21 statement?

22 A. No, I don't.

23 Q. It would have been part of the closing

24 package?

25 A. Correct.

1 Q. So it would have been somebody at LF Loans
2 that would have prepared it then.

3 A. If that was one of LF Loans' packages, then it
4 would come from LF Loans, yes.

5 Q. And also attached to this same exhibit there
6 is this page that starts off, "Leverage Financial d/b/a
7 Transfer Sales Loans. Dear Borrower." Do you know who
8 would have prepared that?

9 A. That would be part of the closing package. If
10 that's one of our packages, then LF Loans would have
11 created that.

12 Q. Well, it says, "Leverage Financial" here, so
13 that would have been part of the package, correct?

14 A. Yes. I don't know about this particular --
15 what I'm saying is there is a payment statement in all of
16 our packages that we sent out.

17 Q. And same with this document, the last one I
18 think in this Exhibit 6, Initial Escrow Account Disclosure
19 Statement, do you know who prepared that?

20 A. No, I don't know who prepared that, but that's
21 typically part of the closing package.

22 Q. Part of the package that LF Loans would have
23 created, correct?

24 A. If that is one of our packages, yes.

25 Q. Because you don't know who created it. But if

1 that in fact was created by LF Loans, then it would have
2 been part of the package.

3 A. Correct.

4 Q. Well, who would have created the loan package
5 in this instance? It would have been LF Loans, right, not
6 GTE?

7 A. Correct. Closing packages are originated from
8 LF Loans.

9 Q. Now, why is a title company involved in the
10 closing of a loan?

11 MR. FEDER: Object to form.

12 A. I believe that's Florida law; I'm not sure.

13 Q. And when was the sale of LF Loans to GTE?

14 A. 2013.

15 Q. And you were not working at GTE in 2012 then.

16 A. Yes, I was.

17 (THEREUPON, A DOCUMENT WAS MARKED "EXHIBIT 7"
18 FOR IDENTIFICATION.)

19 Q. (BY MR. RUSSO) Show you a document marked
20 Exhibit 7 and ask you if you could identify that document
21 for me.

22 A. No, I have no idea what that is.

23 (THEREUPON, AN EMAIL WAS MARKED "EXHIBIT 8"
24 FOR IDENTIFICATION.)

25 Q. (BY MR. RUSSO) Let me show you a document

1 that's been marked Exhibit 8 and ask you if you recognize
2 that document.

3 A. No. I've never seen this document before.

4 Q. I'm talking about the very top part of it, the
5 email. Is that something you sent or was sent at your
6 direction?

7 A. I don't recall.

8 Q. So you don't recall that at all.

9 A. No.

10 Q. Do you know who Rochelle Gonzalez is?

11 A. I do.

12 Q. And who is Rochelle Gonzalez?

13 A. She was head of our closing department.

14 Q. Do you know where she works now?

15 A. I don't think she's -- she's not currently
16 working.

17 Q. Do you know her personally?

18 A. I do.

19 Q. Do you see her regularly?

20 A. I do.

21 Q. She is not a paramour or anything like that;
22 you don't live together or anything like that, do you?

23 A. We do.

24 Q. And who's Tania Swanberg?

25 A. I have no idea.

1 Q. As part of the deposition for today, you were
2 asked do bring certain documents with you. Did you bring
3 any of those documents?

4 MR. FEDER: I have them.

5 MR. RUSSO: Can I take a look at them?

6 MR. FEDER: I'm going to have to print them
7 out.

8 MR. RUSSO: You have to print them out?

9 Well, let's go through them first.

10 Off the record.

11 (OFF THE RECORD.)

12 MR. RUSSO: So let's just go on the record
13 quickly.

14 I believe counsel is going to agree that most
15 of the documents that have been produced, since I say
16 that they're not that important for today's
17 deposition, my office will itemize them and send an
18 email to counsel for Mr. Wilson, GTE, and LF Loans,
19 which he may then confirm as being those documents
20 that were provided today, other than those which may
21 otherwise be identified.

22 MR. FEDER: Let me make it simple. I have
23 produced, in response to a Notice for Deposition
24 Duces Tecum, the 255 pages that we were able to
25 gather in response to your duces tecum; and I've

1 given you a copy of 255 pages.

2 MR. RUSSO: But you agree we can handle most
3 of them the way I stated, correct, other than what I
4 believe is important and I'm going to pull out and
5 have identified.

6 MR. FEDER: I don't understand.

7 MR. RUSSO: I'm just saying that, in the event
8 I later determine something here was important, so
9 that we all agree that it was part of this that was
10 produced today, I'm going to have these documents
11 sort of identified as well as possible and itemized
12 and just sent to you so that you can look at them and
13 say, "Yes, that looks like the list of the documents
14 produced here."

15 MR. FEDER: Of course, I will, as a
16 professional, confirm at any time for whatever
17 reason, if you present me with a document, because I
18 have it segregated in my computer as to the documents
19 I produced today so I can easily confirm that which
20 was given to you here today.

21 MR. RUSSO: Perfect, thank you.

22 MR. FEDER: Sure.

23 (THEREUPON, A COMMITMENT FOR TITLE INSURANCE
24 WAS MARKED "EXHIBIT 9" FOR IDENTIFICATION.)

25 Q. (BY MR. RUSSO) Mr. Wilson, I'm going to show

1 you a document which is marked Exhibit 9 for
2 identification, and it's titled "Commitment for Title
3 Insurance" issued by Stewart Title Guaranty Company, and
4 it is eight pages long, if my counting is correct, and I
5 ask you if you recognize that document.

6 A. Yes, his title commitment.

7 Q. Prepared by Stewart Title, correct?

8 A. Correct.

9 Q. Would that have been part of the loan process?

10 A. The loan process, no. The closing process
11 with the title company, yes.

12 Q. So it would have been part of the closing
13 process. Would it have been required by the lender?

14 A. Yes.

15 Q. In fact, the commitment page, Schedule A,
16 shows that the only policy is really being written for the
17 lender, correct?

18 A. Wait, say that again. I'm sorry, what was
19 your question?

20 Q. That in fact, I said, it shows that the policy
21 is really being written only for the lender. Isn't that
22 correct?

23 A. You mean the title company policy, like the
24 title insurance?

25 Q. Right.

1 A. Yes, to protect the lender, correct. It also
2 protects the borrower, as well.

3 Q. In what way would it protect the borrower?

4 A. Numerous ways, but it's a title commitment, so
5 a title commitment protects all parties involved.

6 (THEREUPON, A DOCUMENT TITLED "WIRE
7 INSTRUCTION" WAS MARKED "EXHIBIT 10" FOR IDENTIFICATION.)

8 Q. (BY MR. RUSSO) I'm going to ask you, please,
9 if you recognize this document, which has been marked
10 Exhibit 10.

11 But before we do that, just to go back to
12 Exhibit 9, Exhibit 9 was part of the documents that you
13 produced for me today, correct?

14 A. Yes, my lawyer just gave it to you.

15 Q. Let me show you now what has been marked
16 Exhibit 10 and ask you if you recognize that document.

17 A. No, I've never seen this Wire Instruction.

18 Q. But you stipulate that these documents were in
19 the set of documents provided to me today as part of the
20 deposition, correct?

21 A. Correct.

22 Q. Now why is it that you do not recognize these
23 documents?

24 A. I mean, I recognize that they're typically
25 part of the loan process, but I didn't see that Wire

1 Instruction previously.

2 Q. But these documents would have been part of
3 GTE's records or part of LF Loans' records?

4 MR. FEDER: Object to form.

5 A. GTE would hold those records.

6 Q. Are you stipulating then that these are in
7 fact true and correct copies of documents maintained in
8 the business records?

9 A. I can't stipulate to that.

10 Q. And who is Advance Mortgage Lending?

11 A. That was Mr. and Mrs. Bennetts' mortgage
12 broker.

13 Q. And their job would have been to gather
14 together all the application information and then submit
15 it to LF Loans or other potential lenders to see who would
16 approve it, correct?

17 A. I don't know who they submit it to, but
18 they're originators of the loan.

19 Q. Have you ever been employed by Advance?

20 A. No.

21 Q. And you were never an officer or director or
22 agent in any way connected with Advance Mortgage.

23 A. No.

24 (THEREUPON, A CLOSING PROTECTION LETTER WAS
25 MARKED "EXHIBIT 11" FOR IDENTIFICATION.)

1 Q. (BY MR. RUSSO) Ask you, please, to identify
2 for me, if you can, a document which has now been marked
3 Exhibit 11.

4 A. It looks like a Closing Protection Letter.

5 Q. Have you seen it before?

6 A. I mean I've seen a ton of Closing Protection
7 Letters.

8 Q. You don't remember whether you saw this one or
9 not?

10 A. I don't remember that one specifically.

11 Q. Would this one have been part of the records
12 of LF Loans?

13 A. Closing Protection Letters would go to the end
14 lender, so it would be GTE would be the keeper of those
15 records.

16 Q. Would have them now. At anytime before GTE
17 purchased LF Loans, would these have been in LF Loans'
18 records?

19 A. No, they would be with GTE.

20 MR. RUSSO: No further questions at this time.

21 MR. FEDER: We'll read if it's printed.

22 AND FURTHER DEPONENT SAYETH NAUGHT.

23 * * * * *

24 (THEREUPON, THE DEPOSITION WAS CONCLUDED AT
25 1:05 P.M.)

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CERTIFICATE OF OATH

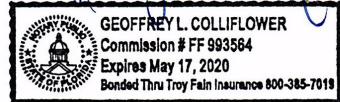
STATE OF FLORIDA:

SS.

COUNTY OF MIAMI-DADE:

I, Geoffrey L. Colliflower, a Notary Public in and for the State of Florida at Large, do hereby certify that Jamal M. Wilson appeared before me and was duly sworn.

WITNESS my hand and official seal this 30th day of June, 2016.



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READING AND SIGNING

DEPOSITION OF JAMAL M. WILSON

I do hereby certify that I have read all questions propounded to me and all answers given by me on the 24th day of June, 2016, taken before Geoffrey L. Colliflower.

___ 1) The transcript is true, correct, and completely accurate.

___ 2) The transcript is true, correct, and accurate except as set forth in my list of corrections, citing the page number, the line number and the reason for the correction, realizing that for this purpose I am still under oath.

Page No. ___ Line No. ___ should read:

Page No. ___ Line No. ___ should read:

Page No. ___ Line No. ___ should read:

Page No. ___ Line No. ___ should read:

JAMAL M. WILSON

Sworn to and subscribed before me this ___ day
of _____, 2016.

Notary Public

My Commission Expires: _____

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TO BE EXECUTED BY THE NOTARY IF JAMAL M. WILSON DOES NOT
SIGN.

I hereby certify that this deposition transcript was
submitted to Jamal M. Wilson for reading and signing on
the 29th day of June, 2016, and that Jamal M. Wilson did
not read and sign this deposition transcript because:

() Jamal M. Wilson or attorney waived reading and
signing by telephone.

() Jamal M. Wilson read the deposition transcript and
witness or attorney waived signing by telephone.

() Jamal M. Wilson refused to sign, giving the following
reason:

() Neither Jamal M. Wilson nor his attorney has
responded to request to read and sign.

DATE

NOTARY PUBLIC

REPORTER'S DEPOSITION CERTIFICATE

STATE OF FLORIDA:

SS.

COUNTY OF MIAMI-DADE:

I, GEOFFREY L. COLLIFLOWER, a Shorthand Reporter and Notary Public in and for the State of Florida at Large, do hereby certify that I was authorized to and did stenographically report the deposition of Jamal M. Wilson; that a review of the transcript was requested; and that the transcript is a true and complete record of my stenographic notes.

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

Witness my hand and official seal this 29th day of June, 2016.

