

Page 232	Page 234
<p>1 produced.</p> <p>2 A. If you don't have any questions, I don't know</p> <p>3 why --</p> <p>4 Q. Just a few follow-up questions. First off, is</p> <p>5 Ms. Weil your attorney, or is Mr. Sheppard your</p> <p>6 attorney?</p> <p>7 A. Mr. Sheppard.</p> <p>8 Q. Did you have a conversation with Ms. Weil at</p> <p>9 the most recent break about questions I had about the</p> <p>10 insurance exclusion before we broke?</p> <p>11 A. About the what?</p> <p>12 Q. Insurance exclusion.</p> <p>13 A. No.</p> <p>14 Q. Did you ever serve in the military?</p> <p>15 A. Yes, sir.</p> <p>16 Q. In what branch?</p> <p>17 A. Army.</p> <p>18 Q. And where did you serve?</p> <p>19 A. Army Reserve.</p> <p>20 Q. Did you ever serve in Vietnam?</p> <p>21 A. No, sir.</p> <p>22 Q. Were you ever a sniper?</p> <p>23 A. No, sir.</p> <p>24 Q. Are you familiar with Florida laws regarding</p> <p>25 mandatory reporting of suspected sex abuse?</p>	<p>1 knowledge, of anything that covers in whole or in part</p> <p>2 suspected sex abuse.</p> <p>3 A. Not that I recall, no.</p> <p>4 Q. Never in the history of ASCA, to your</p> <p>5 knowledge, has any such document, E-mail or verbal</p> <p>6 representation ever been made in whole or in part</p> <p>7 regarding suspected sex abuse of an ASCA member coach</p> <p>8 even if it's just a rumor?</p> <p>9 A. That's a really long question. My essential</p> <p>10 answer is I, in my position, I hear rumors all the time</p> <p>11 and I pay no attention to rumor. I don't recall ever</p> <p>12 getting any firsthand information from anyone.</p> <p>13 Q. Does ASCA keep a record of anything it</p> <p>14 receives concerning in whole or in part suspected sex</p> <p>15 abuse of ASCA members even if it's a rumor?</p> <p>16 A. Sex abuse of ASCA members?</p> <p>17 Q. Yes.</p> <p>18 A. Of ASCA members?</p> <p>19 Q. I'm sorry. By ASCA members.</p> <p>20 A. Say that again.</p> <p>21 Q. Has ASCA ever maintained any records</p> <p>22 pertaining to any suspected allegations of sexual abuse</p> <p>23 committed allegedly by ASCA members even if it's a</p> <p>24 rumor?</p> <p>25 A. I believe that's the same question you just</p>
<p>Page 233</p> <p>1 A. Not specifically, no, sir.</p> <p>2 Q. Do you know whether or not ASCA qualifies as a</p> <p>3 mandatory reporter under Florida state law?</p> <p>4 A. I do not, sir.</p> <p>5 Q. Do you know if ASCA qualifies as a mandatory</p> <p>6 reporter under the federal laws under the Mann, M-a-n-n,</p> <p>7 Act?</p> <p>8 A. I'm not familiar with that at all, sir.</p> <p>9 Q. How, if at all, does ASCA keep abreast of</p> <p>10 state or federal laws concerning child protection, if</p> <p>11 you know?</p> <p>12 A. I can't really say that we do.</p> <p>13 Q. All right. Does ASCA keep a record of any sex</p> <p>14 abuse claims or complaints or concerns or reports or</p> <p>15 allegations that have ever been forwarded to it?</p> <p>16 A. We would not keep track of any rumors, and I</p> <p>17 don't recall that we are, have any access to any facts.</p> <p>18 In other words, I don't think anyone has come to us with</p> <p>19 a direct firsthand report.</p> <p>20 Q. Okay. Sir, I'm not talking about rumors and</p> <p>21 rumors sometimes turn into arrests. I don't know. When</p> <p>22 it concerns kids, I tend to uncover every stone, but</p> <p>23 that's just me. My question to you is have you, has</p> <p>24 ASCA, to your knowledge, ever received any document,</p> <p>25 whether it contains rumors or what you say firsthand</p>	<p>Page 235</p> <p>1 asked me, and I believe my answer is the same, which is</p> <p>2 that we have not gotten, to my knowledge, any direct</p> <p>3 factual firsthand information, and we don't keep track</p> <p>4 of rumors.</p> <p>5 Q. Have any matters been brought to your</p> <p>6 attention, to your knowledge, even if they are -- for</p> <p>7 example, what you're telling me is there's a threshold</p> <p>8 that must be passed before the record is kept. I don't</p> <p>9 know. But I want to explore it. I am a concerned</p> <p>10 parent from Iowa and I tell you, "Mr. Leonard, I</p> <p>11 think -- and this is just a rumor -- that a coach here</p> <p>12 has been sexually abusing kids" and I write you an</p> <p>13 E-mail. Would that be kept in your files?</p> <p>14 A. No. I would tell that person whether it be</p> <p>15 E-mail or whether it be phone that if they suspect that</p> <p>16 there's been a law broken and there's been a crime</p> <p>17 committed that they need to go to the local police and</p> <p>18 they need to go to the proper authorities within their</p> <p>19 area, within their state.</p> <p>20 Q. What would you do with that E-mail if it was</p> <p>21 sent to you?</p> <p>22 A. If it's somebody who's doing, reporting this</p> <p>23 as a rumor, it's not the parent firsthand, nothing.</p> <p>24 Q. What if I am a parent and I'm telling you that</p> <p>25 I suspect -- and it's just a rumor. I don't know this</p>