

<p style="text-align: right;">Page 1</p> <p>1 BEFORE THE OFFICE OF MANAGEMENT AND ENTERPRISE SERVICES</p> <p>2 STATE OF OKLAHOMA</p> <p>3 CREEKS BEHAVIORAL HEALTH SERVICES, INC., FAMILY AND CHILDREN'S SERVICES, INC.,</p> <p>4 Protestants,</p> <p>5 vs. Protest No. 2024-01</p> <p>6 THE OFFICE OF MANAGEMENT AND ENTERPRISE SERVICES, Solicitation No. EV00000232</p> <p>7 Respondent.</p> <p>8</p> <p>9</p> <p>10</p> <p>11 DEPOSITION OF LARRY SMITH</p> <p>12 TAKEN ON BEHALF OF THE PROTESTANT</p> <p>13 ON DECEMBER 17, 2024, BEGINNING AT 9:02 A.M.</p> <p>14 IN TULSA, OKLAHOMA</p> <p>15</p> <p>16 APPEARANCES</p> <p>17 On behalf of the PROTESTANT FAMILY &amp; CHILDREN'S SERVICES:</p> <p>18 Hilary Velandia</p> <p>19 Elise Dunitz Brennan</p> <p>20 CONNER &amp; WINTERS</p> <p>21 4100 First Place Tower, 15 East Fifth Street</p> <p>22 Tulsa, OK 74103</p> <p>23 918-586-5693</p> <p>24 hvelandia@cwlaw.com</p> <p>25 ebrennan@cwlaw.com</p> <p>26</p> <p>27 (Appearances continued on next page.)</p> <p>28 REPORTED BY: Barbara Tiffie, CSR, RPR</p>	<p style="text-align: right;">Page 3</p> <p>1 ALSO PRESENT: Allison Loehr, In-House counsel for Family &amp; Children's Services</p> <p>2</p> <p>3 Jennifer L. Johnson, In-House counsel for CREEKS</p> <p>4</p> <p>5 Ashley Westmorland, Chief of Staff &amp; Strategy CREEKS</p> <p>6</p> <p>7</p> <p>8</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>
<p style="text-align: right;">Page 2</p> <p>1 APPEARANCES (Continued)</p> <p>2 On behalf of the PROTESTANT CREEKS BEHAVIORAL HEALTH SERVICES, INC.:</p> <p>3 Paul DeMuro</p> <p>4 FREDERIC DORWART, LAWYERS PLLC</p> <p>5 124 East Fourth Street</p> <p>6 Tulsa, OK 74103</p> <p>7 918-583-9957</p> <p>8 pdemuro@fdlaw.com</p> <p>9</p> <p>10 On behalf of the RESPONDENT OFFICE OF MANAGEMENT AND ENTERPRISE SERVICES:</p> <p>11 Courtney Templeton</p> <p>12 OFFICE OF MANAGEMENT AND ENTERPRISE SERVICES</p> <p>13 DEPUTY GENERAL COUNSEL</p> <p>14 2401 N. Lincoln Blvd.</p> <p>15 Oklahoma City, OK 73105</p> <p>16 405-521-2444</p> <p>17 courtney.templeton@omes.ok.gov</p> <p>18</p> <p>19 Ryan D. Berry</p> <p>20 OKLAHOMA MENTAL HEALTH &amp; SUBSTANCE ABUSE ASSISTANT GENERAL COUNSEL</p> <p>21 2000 N. Classen Blvd., Suite 2-600</p> <p>22 Oklahoma City, OK 73106</p> <p>23 405-248-9246</p> <p>24 ryan.berry@odmhsas.org</p> <p>25</p> <p>26 On behalf of the INTERVENOR GRAND LAKE MEDICAL MENTAL HEALTH CENTER, INC., dba GRAND MENTAL HEALTH:</p> <p>27</p> <p>28 Marcus N. Ratcliff</p> <p>29 Hailey Huber</p> <p>30 LATHAM, KEELE, LEHMAN, RATCLIFF, CARTER &amp; CLARKE</p> <p>31 1515 E. 71st Street, Suite 200</p> <p>32 Tulsa, OK 74136</p> <p>33 918-970-2000</p> <p>34 mratcliff@law-lsl.com</p> <p>35 hhuber@law-lkl.com</p>	<p style="text-align: right;">Page 4</p> <p>1 INDEX</p> <p>2 PAGE</p> <p>3 LARRY SMITH</p> <p>4 DIRECT EXAMINATION BY MS. VELANDIA 7</p> <p>5</p> <p>6 EXHIBITS</p> <p>7 Exhibit Description</p> <p>8 1 Text messages 174</p> <p>9 2 Text messages 176</p> <p>10 3 Text messages 179</p> <p>11 4 Text messages 180</p> <p>12 5 E-mail 2/13/23 182</p> <p>13 6 Text messages 183</p> <p>14 7 Text messages 188</p> <p>15 8 E-mail 9/27/23 190</p> <p>16 9 Text messages 195</p> <p>17 10 Text messages 197</p> <p>18 11 Text messages 202</p> <p>19 12 Text messages 204</p> <p>20 13 Title 450 205</p> <p>21 14 Healthy Minds Policy Initiative Tulsa System Assessment 205</p> <p>22 15 E-mail 12/2/22 207</p> <p>23 16 E-mail 1/25/23 207</p> <p>24</p> <p>25</p> <p>26 CERTIFIED QUESTION</p> <p>27</p> <p>28 Page Line</p> <p>29 211 15</p> <p>30</p> <p>31</p> <p>32</p> <p>33</p> <p>34</p> <p>35</p>

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1 STIPULATIONS

2 It is hereby stipulated and agreed by and between

3 the parties hereto, through their respective attorneys,

4 that the deposition of LARRY SMITH may be taken pursuant

5 to agreement and in accordance with the Oklahoma

6 Discovery Code on December 17, 2024, at the offices of

7 1515 E. 71st Street, Tulsa, Oklahoma, before Barbara

8 Tiffie, CSR, RPR.

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1 THE VIDEOGRAPHER: This is the videotaped

2 deposition of Larry Smith in the matter of CREOKS

3 Behavioral Health, et al., versus OMES of Oklahoma.

4 This deposition is being held at 1515 East 71st Street

5 in Tulsa, Oklahoma, on December 17th, 2024. We are on

6 the record at 9:03 a.m.

7 Will counsel please state your appearances for

8 the record.

9 MS. VELANDIA: Hilary Velandia and Elise

10 Brennan for Family & Children's Services.

11 MS. LOEHR: Allison Loehr for Family &

12 Children's Services.

13 MS. JOHNSON: Jennifer Johnson for CREOKS.

14 MR. DEMURO: Paul DeMuro for CREOKS.

15 MS. TEMPLETON: Courtney Templeton for the

16 Office of Management and Enterprise Services.

17 MR. BERRY: Ryan Berry for the Department of

18 Mental Health & Substance Abuse Services.

19 MS. HUBER: Hailey Huber for Grand Mental

20 Health.

21 MR. RATCLIFF: Marcus Ratcliff for Grand.

22 THE WITNESS: Larry Smith with -- for Grand.

23 THE VIDEOGRAPHER: The court reporter will now

24 swear in the witness.

25 WHEREUPON,

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1 LARRY SMITH

2 after having been first duly sworn, deposes and says in

3 reply to the questions propounded as follows, to-wit:

4 DIRECT EXAMINATION

5 BY MS. VELANDIA:

6 **Q Good morning.**

7 A Good morning.

8 **Q I'll introduce myself again. I'm Hilary**

9 **Velandia. I represent Family & Children's Services.**

10 A Okay.

11 **Q Thank you for coming over this morning.**

12 A Yeah. You may -- if I don't hear you, you may

13 have to speak up. I have hearing aids and --

14 **Q Okay.**

15 A -- but, anyway, thank you.

16 **Q All right. Let me know if you can't hear me --**

17 A Okay.

18 **Q -- and I will speak up.**

19 A I'm good.

20 **Q Let me know if I'm speaking too fast too,**

21 **because I tend to do that.**

22 A Okay.

23 **Q So I'll -- I'll try to slow it down if you need**

24 **me to. So have you been deposed before?**

25 A Yes, about 35 years ago.

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1 **Q And what -- what were you deposed -- why were**

2 **you deposed?**

3 A It was a sexual harassment case.

4 **Q For -- against Grand Mental Health?**

5 A No.

6 **Q Who was it against?**

7 A American Legion Children's Home.

8 **Q Okay. And did you work there at the time?**

9 A Yes.

10 **Q What was your position there?**

11 A Executive director.

12 **Q And who was the employee that was being accused**

13 **of sexual harassment?**

14 A I don't recall her name.

15 **Q Okay. And was that here in Tulsa County?**

16 A Kay County.

17 **Q Kay County? And was that a state court**

18 **proceeding?**

19 A I don't know.

20 **Q Federal court?**

21 A 35 years is a long time ago.

22 **Q It is a long time. Did it go to trial?**

23 A No.

24 **Q And was it a female that was accused of sexual**

25 **harassment or was the female the plaintiff?**

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1 A The female was the plaintiff.

2 **Q Okay. And who was she accusing had sexually**

3 **harassed her?**

4 A That would be me.

5 **Q Okay. Did that case settle?**

6 A Yes.

7 **Q And who was -- who were your attorneys in that**

8 **case?**

9 A Mike Collins.

10 **Q And what did she specifically allege?**

11 A I'm sorry?

12 **Q What did -- what did the plaintiff allege in**

13 **that case specifically?**

14 A I -- I don't -- I don't even know. Couldn't

15 tell you.

16 **Q Was the plaintiff deposed in that case?**

17 A Yes.

18 **Q Have you been deposed any other time?**

19 A No.

20 **Q Have you ever testified in court?**

21 A No.

22 **Q Have you ever testified in any other kind of**

23 **proceeding under oath?**

24 A No.

25 **Q Are you on any medications today that might**

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1 **prevent you from answering truthfully?**

2 A No.

3 **Q So just some ground rules. We already talked**

4 **about if I'm talking too fast or if you can't hear me,**

5 **let me know. If you don't understand my question, you**

6 **can ask me to restate it. Otherwise I'm going to assume**

7 **that you understand it.**

8 A (Witness moves head up and down.)

9 **Q And I'm going to use some terms today, and I**

10 **just want to go ahead and get them out there before we**

11 **get to them so that the court reporter will have them**

12 **down. So if I talk about the Department of Mental**

13 **Health & Substance Abuse Services, I'm probably going to**

14 **refer to that as DMH. Do you understand what I mean?**

15 A Yes.

16 **Q And if I talk about the RFP or the**

17 **solicitation, I'm usually going to be -- I'm going to be**

18 **talking about the CCBHC solicitation that was issued in**

19 **2023 for Tulsa County --**

20 A Yes.

21 **Q -- and -- and Cleveland County. And if I say**

22 **FCS, I'm going to mean Family & Children Services. Do**

23 **you understand that?**

24 A I'm sorry?

25 **Q If I say FCS, I'm referring to Family &**

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1 **Children's Services.**

2 A Okay.

3 **Q Do you understand that? And if I say OHCA,**

4 **O-H-C-A, I'm referring to the Oklahoma Health Care**

5 **Authority.**

6 A Okay.

7 **Q And if I say catchment area or service area,**

8 **I'm talking about the catchment area and service areas**

9 **for CMHCs or CBHCs. Do you understand what those are?**

10 A The CMHC?

11 **Q The catchment areas that apply for CMHCs or**

12 **CBHC services?**

13 A Yes.

14 **Q I might use catchment area and service area**

15 **interchangeably, but I mean the same thing. Do you**

16 **understand that?**

17 A Okay.

18 **Q And also I might use for community -- for**

19 **Certified Community Behavioral Health Center, I might**

20 **use the term CBHC or CCBHC. Do you understand what I**

21 **mean --**

22 A Yes.

23 **Q -- when I use those? And I might use those**

24 **interchangeably. And for CMHC, I'm referring to**

25 **Community Mental Health Center. Do you understand that**

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1 **that's --**

2 A Yes.

3 **Q -- what I'm referring to? Okay. Okay. Can**

4 **you fill me in on your education after high school?**

5 A I -- online courses at California Coast

6 University, nine hours from a bachelor's degree in

7 business administration.

8 **Q Any other -- any other education after that?**

9 A Went to several workshops.

10 **Q What year did you get your bachelor's degree?**

11 A I didn't get a bachelor's degree.

12 **Q Oh, I'm sorry. What kind of degree did you**

13 **get?**

14 A I was nine hours from a bachelor's degree.

15 **Q And when did you stop attending that school?**

16 A '89.

17 **Q And why -- why did you stop attending when you**

18 **were only nine hours away?**

19 A Just got tired of it.

20 **Q Were you in Tulsa when you were attending**

21 **that online course?**

22 A No.

23 **Q Where were you?**

24 A Ponca City.

25 **Q Ponca? And in 1989, they had online courses on**

<p>Page 13</p> <p>1 <b>the Internet?</b></p> <p>2 A Yes, one of the first.</p> <p>3 <b>Q And then you said several workshops after that?</b></p> <p>4 A Yes.</p> <p>5 <b>Q What were those workshops related to?</b></p> <p>6 A They were conferences that I went to, and I</p> <p>7 went to different workshops, different areas of</p> <p>8 discussion.</p> <p>9 <b>Q Were those related to mental health?</b></p> <p>10 A Yes.</p> <p>11 <b>Q Did you get any kind of a certification or</b></p> <p>12 <b>license?</b></p> <p>13 A No. I am a CPRSS, Certified Peer Recovery</p> <p>14 Support Specialist.</p> <p>15 <b>Q And how long have you been a CPRSS?</b></p> <p>16 A Probably ten years.</p> <p>17 <b>Q And do you provide services now as a CPRSS? Do</b></p> <p>18 <b>you provide services now --</b></p> <p>19 A No.</p> <p>20 <b>Q -- as a CPRSS?</b></p> <p>21 A No.</p> <p>22 <b>Q Have you ever provided services as a CPRSS?</b></p> <p>23 A No.</p> <p>24 <b>Q Why did you get the certification?</b></p> <p>25 A We wanted our -- all of our administrators at</p>	<p>Page 15</p> <p>1 A Oh, '78, I'm sorry. Yes.</p> <p>2 <b>Q And what did you do after you left the Air</b></p> <p>3 <b>Force?</b></p> <p>4 A I went to work for the American Legion</p> <p>5 Children's Home.</p> <p>6 <b>Q Where is that at?</b></p> <p>7 A Ponca City.</p> <p>8 <b>Q When you were in the Air Force, where did you</b></p> <p>9 <b>live?</b></p> <p>10 A Oklahoma City.</p> <p>11 <b>Q And what was your role at the children's home</b></p> <p>12 <b>when you started?</b></p> <p>13 A House parent.</p> <p>14 <b>Q Was that in 1978?</b></p> <p>15 A '76.</p> <p>16 <b>Q When did -- so you were working for the</b></p> <p>17 <b>children's home while you were still on Air Force</b></p> <p>18 <b>reserve status?</b></p> <p>19 A Yes.</p> <p>20 <b>Q And as a house parent, what were your duties?</b></p> <p>21 A Taking care of a dorm, some -- with adolescents</p> <p>22 living there, male adolescents.</p> <p>23 <b>Q How many children lived in that home?</b></p> <p>24 A Right at 100.</p> <p>25 <b>Q How many dorms were there?</b></p>
<p>Page 14</p> <p>1 Grand to be -- to -- that -- that qualified to have a</p> <p>2 CCBRS.</p> <p>3 <b>Q Why did Grand want that?</b></p> <p>4 A Nobody else had it.</p> <p>5 <b>Q Was that a requirement to get any kind of a</b></p> <p>6 <b>license or a certification or contract?</b></p> <p>7 A No.</p> <p>8 <b>Q And how did you obtain your CPRSS</b></p> <p>9 <b>certification?</b></p> <p>10 A It was five -- five days of training put on by</p> <p>11 the Department of Mental Health.</p> <p>12 <b>Q And any other education, other than the</b></p> <p>13 <b>workshops, the CPRSS training and the California online</b></p> <p>14 <b>course?</b></p> <p>15 A No.</p> <p>16 <b>Q And tell -- walk me through your work history</b></p> <p>17 <b>starting after high school.</b></p> <p>18 A Joined the United States Air Force, reserve</p> <p>19 status.</p> <p>20 <b>Q What was your role with -- in the Air Force?</b></p> <p>21 A It was supply.</p> <p>22 <b>Q How long -- when did you stop serving in the</b></p> <p>23 <b>Air Force?</b></p> <p>24 A '76.</p> <p>25 <b>Q Was that an honorable discharge?</b></p>	<p>Page 16</p> <p>1 A Four.</p> <p>2 <b>Q Did you remain a house parent the whole time</b></p> <p>3 <b>that you were at the children's home?</b></p> <p>4 A No.</p> <p>5 <b>Q Did you have other titles?</b></p> <p>6 A Yes.</p> <p>7 <b>Q What were those titles in order?</b></p> <p>8 A I eventually become the executive director.</p> <p>9 <b>Q Do you remember when that was?</b></p> <p>10 A No, don't recall.</p> <p>11 <b>Q Did you have any other titles while you were at</b></p> <p>12 <b>the children's home?</b></p> <p>13 A No.</p> <p>14 <b>Q When did you leave the children's home?</b></p> <p>15 A '89.</p> <p>16 <b>Q Why did you leave the children's home?</b></p> <p>17 A Just tired of the work.</p> <p>18 <b>Q Why were you tired of the work?</b></p> <p>19 A Huh?</p> <p>20 <b>Q Why were you tired of the work?</b></p> <p>21 A It's pretty draining, pretty -- all the time,</p> <p>22 24/7, and I -- it was time for me to do something else.</p> <p>23 <b>Q Where did you go after you left the children's</b></p> <p>24 <b>home?</b></p> <p>25 A Ark City Memorial Hospital.</p>

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1 **Q And what was your title when you started there?**

2 A In charge of accounts receivable.

3 **Q When you were at the children's home and you**

4 **were executive director, was that the lead executive**

5 **role at that --**

6 A Yes.

7 **Q -- center? What did you do as -- what was --**

8 **what was your title again at the Ark City Memorial**

9 **Hospital?**

10 A AR specialist, I guess. I -- I'm not sure what

11 the title was.

12 **Q Accounts receivable specialist? Is that what**

13 **you mean by AR?**

14 A That's what I did there. I'm not sure what the

15 title was.

16 **Q And what were your duties as a AR specialist?**

17 A Make sure that insurance paid, make sure that

18 individuals paid and accounts -- just all accounts

19 receivable.

20 **Q And how long did you serve in that role?**

21 A I -- I'm going to guess two years.

22 **Q And then did you continue at the hospital or**

23 **did you transition to a --**

24 A I transitioned.

25 **Q To another role at the hospital?**

Page 18

1 A No.

2 **Q You left the hospital after --**

3 A Yes.

4 **Q -- two years? Where did you work next?**

5 A I can't remember the name of it. It was a -- a

6 computer company, software.

7 **Q What did that company do? What kind of**

8 **software?**

9 A Medical.

10 **Q And what year was that that you started working**

11 **there?**

12 A I believe it was eighty -- '91, '92.

13 **Q And was that electronic medical records**

14 **software?**

15 A Yes.

16 **Q What was the name of that company?**

17 A I -- I cannot recall.

18 **Q Do you remember the name of their software?**

19 A No.

20 **Q And what did you do there?**

21 A I was vice president.

22 **Q And did your -- did your role change while you**

23 **were there?**

24 A No.

25 **Q How long were you there?**

Page 19

1 A Let me re-answer that question. It did change.

2 The --

3 **Q What --**

4 A -- role changed, but not the title.

5 **Q What was the role? What were your duties when**

6 **you first started?**

7 A Overseeing all the programmers and the software

8 product.

9 **Q And what was your role when it changed?**

10 A Taking General Sign through bankruptcy.

11 **Q Can you repeat what that -- what you said**

12 **there?**

13 A General Sign. It was a company in Cape

14 Girardeau, Missouri. That's also where Computer

15 Solutions, I think, is the -- is the name of that

16 company.

17 **Q Okay. So when you oversaw the programming and**

18 **the software, did that require you to be familiar with**

19 **programming and -- and software coding?**

20 A It required me to be familiar with the software

21 and how it worked.

22 **Q Do you have any training in computer**

23 **programming?**

24 A No.

25 **Q Computer coding?**

Page 20

1 A No.

2 **Q So what do you mean when you say that you took**

3 **General Sign through bankruptcy while you were at the**

4 **computer software company?**

5 A The -- the owner of -- of that company was an

6 attorney, and he took General Sign through bank -- he

7 had me take them through bankruptcy to try to collect

8 all of the dollars that was owed to them. They did big

9 signs for hotels, motels.

10 **Q What did you say the name of the computer**

11 **software company was again?**

12 A Computer Solutions, I believe, was the right

13 name.

14 **Q So what was the relationship between General**

15 **Sign and Computer Solutions?**

16 A The owner of -- of Computer Solutions was an

17 attorney, and he was taking -- he was hired to take

18 General Sign through bankruptcy.

19 **Q What was the name of that attorney? So as**

20 **part --**

21 A I couldn't tell you.

22 **Q So as part of your employment with computer**

23 **solutions, the owner asked you to take General Sign**

24 **through bankruptcy?**

25 A Yes. Mostly to collect all of their accounts

<p>1 receivable was my biggest role in that.</p> <p>2 <b>Q Were you a receiver? Was that your title?</b></p> <p>3 A AR specialist, I guess.</p> <p>4 <b>Q All during that whole time, your paycheck came</b></p> <p>5 <b>from Computer Solutions?</b></p> <p>6 A I'm sorry?</p> <p>7 <b>Q During that time that you were taking General</b></p> <p>8 <b>Sign through bankruptcy, you were paid by Computer</b></p> <p>9 <b>Solutions?</b></p> <p>10 A Yes.</p> <p>11 <b>Q And did you take it all the way through the</b></p> <p>12 <b>bankruptcy?</b></p> <p>13 A I collected all the -- about \$3 million worth</p> <p>14 of accounts receivable that was owed.</p> <p>15 <b>Q And during that time that you were taking</b></p> <p>16 <b>General Sign through bankruptcy, were you still</b></p> <p>17 <b>overseeing programming and software?</b></p> <p>18 A I -- I don't think the -- it's right to say I</p> <p>19 took them through bankruptcy. The attorneys took them</p> <p>20 through bankruptcy, not me. I was in charge of</p> <p>21 collecting their AR.</p> <p>22 <b>Q And while you were collecting the AR for</b></p> <p>23 <b>General Sign, were you still overseeing programmers and</b></p> <p>24 <b>software?</b></p> <p>25 A Yes.</p>	<p>Page 21</p> <p>1 <b>Q Who was that person?</b></p> <p>2 A Bill Meek.</p> <p>3 <b>Q And what year did you buy ABC Cleaning?</b></p> <p>4 A Had to be '92, I believe, if I recall right.</p> <p>5 <b>Q What was your title while you were there?</b></p> <p>6 A Owner.</p> <p>7 <b>Q Did you have a manager or a CEO that run -- ran</b></p> <p>8 <b>the business?</b></p> <p>9 A No.</p> <p>10 <b>Q Did you run the business?</b></p> <p>11 A Yes.</p> <p>12 <b>Q Any other clients besides the health department</b></p> <p>13 <b>and Braum's?</b></p> <p>14 A Yeah, but I can't recall. It's been a long</p> <p>15 time ago. 32 years or so, something like that.</p> <p>16 <b>Q How many health department facilities did you</b></p> <p>17 <b>clean?</b></p> <p>18 A I -- I don't recall.</p> <p>19 <b>Q Was it just in one area or was it all over the</b></p> <p>20 <b>state?</b></p> <p>21 A It was just in one area. It was up and down 35</p> <p>22 for Braum's, from probably the Kansas line to maybe</p> <p>23 Perry on 35.</p> <p>24 <b>Q And the health department, where -- where were</b></p> <p>25 <b>those facilities located?</b></p>
<p>Page 22</p> <p>1 <b>Q How long did you work at Computer Solutions?</b></p> <p>2 A About 18 months.</p> <p>3 <b>Q Where did you work after you left Computer</b></p> <p>4 <b>Solutions?</b></p> <p>5 A I bought a company.</p> <p>6 <b>Q What company?</b></p> <p>7 A ABC Cleaning.</p> <p>8 <b>Q And why did you leave Computer Solutions?</b></p> <p>9 A Just didn't enjoy the work anymore.</p> <p>10 <b>Q And were you the sole owner of ABC Cleaning?</b></p> <p>11 A Uh-huh.</p> <p>12 <b>Q What --</b></p> <p>13 A Yes.</p> <p>14 <b>Q What did ABC Cleaning do?</b></p> <p>15 A They had janitorial jobs, as well as windows.</p> <p>16 <b>Q Who were their clients?</b></p> <p>17 A Huh?</p> <p>18 <b>Q Who were the clients of ABC Cleaning?</b></p> <p>19 A Braum's, for example, up and down 35. Let's</p> <p>20 see, the health department, I believe, was one of those</p> <p>21 contracts.</p> <p>22 <b>Q Did you have to submit a bid to get the</b></p> <p>23 <b>contract with the health department?</b></p> <p>24 A I didn't. The person that owned it before me</p> <p>25 did.</p>	<p>Page 24</p> <p>1 A In Ponca City.</p> <p>2 <b>Q And then how long did you work with ABC</b></p> <p>3 <b>Cleaning?</b></p> <p>4 A '93.</p> <p>5 <b>Q So one year?</b></p> <p>6 A Yes.</p> <p>7 <b>Q Did you sell it in 1993?</b></p> <p>8 A Yes.</p> <p>9 <b>Q How much did you sell it for?</b></p> <p>10 A I don't recall.</p> <p>11 <b>Q Why did you sell it?</b></p> <p>12 A My daughter was killed in a car accident.</p> <p>13 <b>Q I'm sorry.</b></p> <p>14 A She was 15.</p> <p>15 <b>Q Sorry to hear that. Did you take some time off</b></p> <p>16 <b>after that?</b></p> <p>17 A Yes.</p> <p>18 <b>Q When did you start working again?</b></p> <p>19 A At Grand Mental Health.</p> <p>20 <b>Q What year was that?</b></p> <p>21 A '94. Actually, I believe I started in October</p> <p>22 of '94, as a consultant with Grand Mental Health.</p> <p>23 <b>Q What did you do as a consultant when you</b></p> <p>24 <b>started?</b></p> <p>25 A Looked at their books, tried to figure out</p>

<p>1 what -- what -- what was the issues that they were 2 having financially.</p> <p>3 <b>Q What issues were they having financially?</b></p> <p>4 A Well, in '93, the Department of Mental Health 5 contract wasn't much. They were seeing more DMH clients 6 than Medicaid clients, and so I shifted that to where 7 they were seeing more Medicaid clients.</p> <p>8 <b>Q Was that because Medicaid clients were more 9 profitable?</b></p> <p>10 A They paid.</p> <p>11 <b>Q DMH didn't pay then?</b></p> <p>12 A DMH paid, but only a certain amount. Once you 13 hit that amount, then they didn't pay anymore.</p> <p>14 <b>Q Was that -- were those payments for indigent 15 clients?</b></p> <p>16 A Yes.</p> <p>17 <b>Q Uninsured clients, in other words?</b></p> <p>18 A Yes.</p> <p>19 <b>Q And was there a cap on how much they would pay 20 in a year or how much they would pay per patient?</b></p> <p>21 A It -- it was a yearly contract. The -- had -- 22 you only got so much every month, so you divide -- the 23 yearly contract was divided by 12, and then so any -- 24 any services provided over the amount for that month 25 would be charity care.</p>	<p>Page 25</p> <p>1 <b>that consulting?</b></p> <p>2 A Yes.</p> <p>3 <b>Q Did you say you were hired in June of 1994?</b></p> <p>4 A Uh-huh.</p> <p>5 <b>Q Then --</b></p> <p>6 A Yes.</p> <p>7 <b>Q -- when did you start at Grand then?</b></p> <p>8 A Actually as an employee?</p> <p>9 <b>Q As a consultant.</b></p> <p>10 A As a consultant? I think it was October, '93.</p> <p>11 <b>Q Did that contract for being a consultant 12 describe the specific duties you were supposed to 13 perform?</b></p> <p>14 A I'm sorry?</p> <p>15 <b>Q Did that contract for you to be a consultant 16 describe the duties that you were expected to perform?</b></p> <p>17 A Yes.</p> <p>18 <b>Q How did it describe them?</b></p> <p>19 A Basically the CFO.</p> <p>20 <b>Q Had they just -- did they have a CFO before you 21 were hired as consultant?</b></p> <p>22 A Yes.</p> <p>23 <b>Q And did they terminate the CFO before you came 24 over as a consultant?</b></p> <p>25 A I believe after I became a full-time employee.</p>
<p>Page 26</p> <p>1 <b>Q And what was the experience that caused you to 2 be hired by Grand?</b></p> <p>3 A I had a lot of knowledge and information in my 4 head about finances and how to make it work.</p> <p>5 <b>Q What knowledge was that?</b></p> <p>6 A Just knowledge.</p> <p>7 <b>Q Did you have knowledge about Medicaid payment?</b></p> <p>8 A Yes.</p> <p>9 <b>Q How did you have all that knowledge?</b></p> <p>10 A Learned it.</p> <p>11 <b>Q When did you learn it?</b></p> <p>12 A When I came to Grand as a consultant for six 13 months, seven months, something like that.</p> <p>14 <b>Q So why did they hire you if you didn't have the 15 knowledge yet?</b></p> <p>16 A Because I'm good.</p> <p>17 <b>Q What do you mean you're good?</b></p> <p>18 A I have a track record of making things happen.</p> <p>19 <b>Q So where was that track record from?</b></p> <p>20 A It was from all the jobs prior to that.</p> <p>21 <b>Q But was -- did you have a specific title as 22 consultant?</b></p> <p>23 A Just consultant, and then I was hired in June 24 of '94.</p> <p>25 <b>Q Did your -- did you have a written contract for</b></p>	<p>Page 28</p> <p>1 <b>Q So while you were a consultant, they had a CFO?</b></p> <p>2 A Yes, I -- I worked with that CFO to get the 3 billing and the dollars rolling into Grand Mental 4 Health.</p> <p>5 <b>Q How -- how did you come into contact with Grand 6 Mental Health in order to become a consultant?</b></p> <p>7 A Charles Danley.</p> <p>8 <b>Q Who's Charles Danley?</b></p> <p>9 A He was the CEO of Grand Mental Health.</p> <p>10 <b>Q How did you know him?</b></p> <p>11 A We worked together back at the American Legion 12 Children's Home.</p> <p>13 <b>Q What was his role at the children's home?</b></p> <p>14 A Executive director.</p> <p>15 <b>Q Was it -- you were executive director at that 16 children's home at one point; correct?</b></p> <p>17 A Yes.</p> <p>18 <b>Q And was he executive director before you?</b></p> <p>19 A Yes.</p> <p>20 <b>Q And did he go from that children's home to 21 Grand Mental Health?</b></p> <p>22 A I'm sorry?</p> <p>23 <b>Q Did he go from that children's home to -- 24 directly to Grand Mental Health?</b></p> <p>25 A Actually he went to OSU, got a master's degree,</p>

<p style="text-align: right;">Page 29</p> <p>1 and then went to work for Grand Mental Health.</p> <p>2 <b>Q So did you apply for a position at Grand Mental</b></p> <p>3 <b>Health?</b></p> <p>4 A He asked me to come in and consult with them to</p> <p>5 try to figure out what was going on with the agency.</p> <p>6 <b>Q Did he -- did he reach out to you because of</b></p> <p>7 <b>your experience at the children's home or because of</b></p> <p>8 <b>your work at the janitor company?</b></p> <p>9 A I think just because of my experience, period.</p> <p>10 <b>Q Were you guys friends outside of work?</b></p> <p>11 A Yes.</p> <p>12 <b>Q Did you both live in the same town?</b></p> <p>13 A No.</p> <p>14 <b>Q Where did he live?</b></p> <p>15 A Bartlesville.</p> <p>16 <b>Q Did you get together socially? Did you -- did</b></p> <p>17 <b>get together socially with him?</b></p> <p>18 A No.</p> <p>19 <b>Q So how often would you see each other?</b></p> <p>20 A After I became a consultant?</p> <p>21 <b>Q Before you became a consultant.</b></p> <p>22 A Oh, maybe once a year.</p> <p>23 <b>Q So was Grand Mental Health struggling</b></p> <p>24 <b>financially in 1993?</b></p> <p>25 A Yes.</p>	<p style="text-align: right;">Page 31</p> <p>1 A I worked directly under the CFO.</p> <p>2 <b>Q Who was the CFO?</b></p> <p>3 A I don't recall.</p> <p>4 <b>Q So did you have any training on billing</b></p> <p>5 <b>services to federal health care programs while you were</b></p> <p>6 <b>there?</b></p> <p>7 A No.</p> <p>8 <b>Q What were your specific duties related to</b></p> <p>9 <b>billing of federal health care programs while you were</b></p> <p>10 <b>there?</b></p> <p>11 A Running their soft -- when I say running their</p> <p>12 software, I used their software and was able to document</p> <p>13 and then be able to collect their funds that were owed</p> <p>14 to them.</p> <p>15 <b>Q So did you document it before they were billed</b></p> <p>16 <b>or after they were billed?</b></p> <p>17 A After.</p> <p>18 <b>Q So how do you document it?</b></p> <p>19 A The computer.</p> <p>20 <b>Q What in the computer though?</b></p> <p>21 A The software product.</p> <p>22 <b>Q But what was on the software product that was</b></p> <p>23 <b>needed to document?</b></p> <p>24 A Sorry?</p> <p>25 <b>Q What -- what did -- when you documented, what</b></p>
<p style="text-align: right;">Page 30</p> <p>1 <b>Q So what about your experience at the children's</b></p> <p>2 <b>home, at ABC Cleaning, overseeing medical software,</b></p> <p>3 <b>what -- what about that experience was relevant to Grand</b></p> <p>4 <b>bringing you in to assist the CFO?</b></p> <p>5 A The finances had to be done at all of those</p> <p>6 places.</p> <p>7 <b>Q Did you handle the finances at those places?</b></p> <p>8 A Yes.</p> <p>9 <b>Q Did you have CFOs that handled those or did you</b></p> <p>10 <b>handle those directly?</b></p> <p>11 A I handled them directly.</p> <p>12 <b>Q But how did you just come in and start handling</b></p> <p>13 <b>health care claims without any health care experience</b></p> <p>14 <b>for billing?</b></p> <p>15 A That's what I did in -- at Ark City Memorial</p> <p>16 Hospital, accounts receivable.</p> <p>17 <b>Q Accounts receivable is more collections;</b></p> <p>18 <b>correct?</b></p> <p>19 A Yes.</p> <p>20 <b>Q Was it -- was it private pay collections?</b></p> <p>21 A Yes.</p> <p>22 <b>Q So it wasn't billing?</b></p> <p>23 A Part of it was billing.</p> <p>24 <b>Q What were your roles -- what was your role</b></p> <p>25 <b>related to billing at the hospital?</b></p>	<p style="text-align: right;">Page 32</p> <p>1 <b>was in the documents that you used to document the</b></p> <p>2 <b>billing?</b></p> <p>3 A Computer Solutions software.</p> <p>4 <b>Q But what was needed in the documentation? It</b></p> <p>5 <b>wasn't just software. What was -- what was the data?</b></p> <p>6 <b>What was the information in that software?</b></p> <p>7 A I don't understand what you're asking.</p> <p>8 <b>Q Was it medical records that you were using to</b></p> <p>9 <b>document it?</b></p> <p>10 A Yes. Accounts receivable, accounting -- the</p> <p>11 software did everything from medical to finance.</p> <p>12 <b>Q So the software did billing and medical</b></p> <p>13 <b>records?</b></p> <p>14 A Yes.</p> <p>15 <b>Q And so after you billed the services, you would</b></p> <p>16 <b>document the medical records to support the billing?</b></p> <p>17 A I'm sorry?</p> <p>18 <b>Q After you submitted the bills, you would</b></p> <p>19 <b>document using medical records to support the billing?</b></p> <p>20 MR. RATCLIFF: Object to the form. I don't</p> <p>21 understand, but answer it if you understand.</p> <p>22 <b>Q (By Ms. Velandia) So you said earlier that</b></p> <p>23 <b>after you billed the services, you would document the</b></p> <p>24 <b>services so you'd get paid; correct?</b></p> <p>25 A Documented it in the computer, yes.</p>

<p>Page 33</p> <p>1 <b>Q And so you would enter information into the</b></p> <p>2 <b>medical records system?</b></p> <p>3 MR. RATCLIFF: Objection.</p> <p>4 THE WITNESS: I'm sorry?</p> <p>5 MR. RATCLIFF: I don't think he's saying he</p> <p>6 entered information in anyone's medical record.</p> <p>7 MS. VELANDIA: I object to that comment being</p> <p>8 made. You're not testifying.</p> <p>9 MR. RATCLIFF: Answer it if you understand.</p> <p>10 <b>Q (By Ms. Velandia) Can you just explain -- just</b></p> <p>11 <b>walk me through what you did with -- with a bill when</b></p> <p>12 <b>you needed to collect it. How did you document it, what</b></p> <p>13 <b>did you do?</b></p> <p>14 A First of all, I would look to make sure the</p> <p>15 client owed it; right? And then verify that. And then</p> <p>16 I would call the client, talk to the client, they would</p> <p>17 come in, set up meetings, they would come in and we</p> <p>18 talked about their financial situation that they're in,</p> <p>19 and sometimes set up payments for them so they could get</p> <p>20 their obligation resolved.</p> <p>21 <b>Q So that was collecting from patients. Is that</b></p> <p>22 <b>what you mean by client?</b></p> <p>23 A Uh-huh, yes.</p> <p>24 <b>Q Okay. And then -- so what about billing</b></p> <p>25 <b>payors? Were you involved with billing payors?</b></p>	<p>Page 35</p> <p>1 A You'd have to ask Charles Danley.</p> <p>2 <b>Q Did Charles Danley just come in and say -- what</b></p> <p>3 <b>did Charles Danley say?</b></p> <p>4 A What?</p> <p>5 <b>Q What did -- what did you say to Charles Danley</b></p> <p>6 <b>about the position he was talking to you about?</b></p> <p>7 A He asked me to come in as a consultant to look</p> <p>8 at the billing, to look at how we were billing, what we</p> <p>9 were billing to private pay, as well as to DMH, as well</p> <p>10 as to Medicaid.</p> <p>11 <b>Q Did you tell him, I don't have any experience</b></p> <p>12 <b>with billing those kind of entities?</b></p> <p>13 A I'm sure he knew that.</p> <p>14 <b>Q How would he know that?</b></p> <p>15 A I didn't tell him I had experience in billing.</p> <p>16 <b>Q What did you tell him?</b></p> <p>17 A I told him -- I asked him what he wanted me to</p> <p>18 do for him.</p> <p>19 <b>Q And did you say anything else to him about it?</b></p> <p>20 <b>Did you make any other statements to him when you were</b></p> <p>21 <b>discussing --</b></p> <p>22 A No.</p> <p>23 <b>Q -- you possibly working --</b></p> <p>24 A He -- he came to me. I didn't go to him.</p> <p>25 <b>Q I know, but you had a conversation with him;</b></p>
<p>Page 34</p> <p>1 A I'm sorry?</p> <p>2 <b>Q Were you involved with billing insurance or</b></p> <p>3 <b>federal health care programs?</b></p> <p>4 A No.</p> <p>5 <b>Q So you didn't get any experience billing</b></p> <p>6 <b>federal health care programs while you were at the</b></p> <p>7 <b>hospital?</b></p> <p>8 A No.</p> <p>9 <b>Q So why would Grand Mental Health bring you in</b></p> <p>10 <b>to oversee billing of Medicaid services and DMH services</b></p> <p>11 <b>if you didn't have any experience with those?</b></p> <p>12 A You'd have to ask Charles Danley that.</p> <p>13 <b>Q Did you have a resume at that time?</b></p> <p>14 A Yes.</p> <p>15 <b>Q Did your resume state that you had experience</b></p> <p>16 <b>with Medicaid --</b></p> <p>17 A No.</p> <p>18 <b>Q -- or the federal health care programs?</b></p> <p>19 A My resume said exactly what I did and who I</p> <p>20 worked for, starting with the United States Air Force</p> <p>21 all the way to owning ABC Cleaning. And then after my</p> <p>22 daughter got killed, I just stopped everything.</p> <p>23 <b>Q So what did you tell Charles Danley you could</b></p> <p>24 <b>do regarding Medicaid services to get that job if you</b></p> <p>25 <b>didn't have any experience?</b></p>	<p>Page 36</p> <p>1 <b>right?</b></p> <p>2 A Yes.</p> <p>3 <b>Q So what else did you say to him?</b></p> <p>4 A 35 years ago.</p> <p>5 <b>Q Did you tell him that you thought you could</b></p> <p>6 <b>improve Grand's finances?</b></p> <p>7 A I believe he believed I could.</p> <p>8 <b>Q Why would he believe that?</b></p> <p>9 A Because most things that I do I'm successful</p> <p>10 at.</p> <p>11 <b>Q So how did you learn about Medicaid bill --</b></p> <p>12 <b>billing requirements when you started at Grand without</b></p> <p>13 <b>any prior experience?</b></p> <p>14 A There was a CFO there that had that experience.</p> <p>15 <b>Q And he trained you?</b></p> <p>16 A Yes.</p> <p>17 <b>Q And you got all that training in six months?</b></p> <p>18 A Yes. It's not complicated.</p> <p>19 <b>Q Why were you hired as a consultant if you</b></p> <p>20 <b>needed to be trained?</b></p> <p>21 MR. DEMURO: Objection. Calls for speculation.</p> <p>22 <b>Q (By Ms. Velandia) Do you have any idea about</b></p> <p>23 <b>why you were hired as a consultant when you needed to be</b></p> <p>24 <b>trained?</b></p> <p>25 MR. DEMURO: Same objection.</p>

<p style="text-align: right;">Page 37</p> <p>1 <b>Q (By Ms. Velandia) You can still respond.</b></p> <p>2 THE WITNESS: Do I answer it?</p> <p>3 MR. RATCLIFF: You can answer if you know.</p> <p>4 THE WITNESS: So what was the question again?</p> <p>5 MS. VELANDIA: Can you read back my question,</p> <p>6 please?</p> <p>7 (Reporter read back requested portion.)</p> <p>8 MR. DEMURO: Object to the form of the</p> <p>9 question.</p> <p>10 MR. RATCLIFF: You can answer if you know.</p> <p>11 THE WITNESS: Can you clarify what you're</p> <p>12 asking?</p> <p>13 <b>Q (By Ms. Velandia) Why do you think you were</b></p> <p>14 <b>hired as a consultant when you needed to be trained to</b></p> <p>15 <b>do the work that you were hired for?</b></p> <p>16 A My job at that point was to come in and look at</p> <p>17 their software, which I had experience in the software</p> <p>18 for medical services, to determine how it would be best</p> <p>19 used. It was called Echo soft -- Echo Group, and they</p> <p>20 sold out to Therapy Brands.</p> <p>21 <b>Q How did you have experience with Echo Group</b></p> <p>22 <b>software?</b></p> <p>23 A I didn't.</p> <p>24 <b>Q Didn't you say that you had experience with the</b></p> <p>25 <b>software that Grand was using?</b></p>	<p style="text-align: right;">Page 39</p> <p>1 A Yes.</p> <p>2 <b>Q And how did he -- how did he train you on</b></p> <p>3 <b>federal health care programs if he was in over his head?</b></p> <p>4 A We discussed it, we talked about it, we talked</p> <p>5 about the Department of Mental Health, Oklahoma Health</p> <p>6 Care Authority billing and what -- what it took to do</p> <p>7 that.</p> <p>8 <b>Q Where did he work before he was brought in as</b></p> <p>9 <b>CFO at Grand?</b></p> <p>10 A I have no idea.</p> <p>11 <b>Q Why do you say he was in over his head?</b></p> <p>12 A Obviously there was a lot of AR out there, and</p> <p>13 they were -- they were billing DMH, who was not</p> <p>14 reimbursing them for all the services they were doing.</p> <p>15 <b>Q So was he in over his head regarding the</b></p> <p>16 <b>requirements to bill Medicaid and DMH?</b></p> <p>17 A No.</p> <p>18 <b>Q He was in over his head regarding the</b></p> <p>19 <b>collecting of AR?</b></p> <p>20 A He was over -- he was in over his head as far</p> <p>21 as understanding the mental health system and finance,</p> <p>22 including balance sheets and financial statements.</p> <p>23 <b>Q So did he train you on the mental health</b></p> <p>24 <b>system?</b></p> <p>25 A I don't understand what you're asking.</p>
<p style="text-align: right;">Page 38</p> <p>1 A No.</p> <p>2 <b>Q So it was just your experience with software in</b></p> <p>3 <b>general?</b></p> <p>4 A Yes, and finance.</p> <p>5 <b>Q And did the CFO know that he was going to be</b></p> <p>6 <b>leaving when you were hired as a consultant?</b></p> <p>7 A I'm sorry?</p> <p>8 <b>Q I think I said that wrong. Did the CFO know</b></p> <p>9 <b>that he was going to be leaving Grand when you were</b></p> <p>10 <b>hired as a consultant?</b></p> <p>11 A The C -- the CFO retired, named -- by the name</p> <p>12 of Ray Kay, and then they brought in Bruce -- I can't</p> <p>13 remember his last name -- to fulfill that role, and he</p> <p>14 was way over his head.</p> <p>15 <b>Q Was Ray Kay the CFO that trained you while you</b></p> <p>16 <b>were a consultant?</b></p> <p>17 A No, it was Bruce.</p> <p>18 <b>Q Did Ray Kay leave Grand before you joined as a</b></p> <p>19 <b>consultant?</b></p> <p>20 A About the same time I came in.</p> <p>21 <b>Q So the person who trained you on billing for</b></p> <p>22 <b>federal health care programs was in over his head?</b></p> <p>23 A Was who?</p> <p>24 <b>Q The person who trained you on federal health</b></p> <p>25 <b>care programs, he was in over his head?</b></p>	<p style="text-align: right;">Page 40</p> <p>1 <b>Q You said -- you said earlier that he trained</b></p> <p>2 <b>you; right? Bruce trained you when you were a</b></p> <p>3 <b>consultant?</b></p> <p>4 A Yes.</p> <p>5 <b>Q But he was in over his head on the mental</b></p> <p>6 <b>health system?</b></p> <p>7 A He was in over his head as far as the finance</p> <p>8 goes.</p> <p>9 <b>Q But you just said he was in over his head on</b></p> <p>10 <b>the mental health system.</b></p> <p>11 A I stand to be corrected.</p> <p>12 <b>Q So was he -- had he worked in the mental health</b></p> <p>13 <b>system before?</b></p> <p>14 A Me?</p> <p>15 <b>Q No, Bruce.</b></p> <p>16 A I'm not sure.</p> <p>17 <b>Q Did you get any other training on the mental</b></p> <p>18 <b>health system besides from Bruce?</b></p> <p>19 A Donna Aultz, Becky Foster, who was -- who's in</p> <p>20 charge of the billing.</p> <p>21 <b>Q What's Donna Aultz's -- what was her title at</b></p> <p>22 <b>the time?</b></p> <p>23 A She was just in charge of billing. I don't</p> <p>24 know what her title at that time was.</p> <p>25 <b>Q And you said Becky Foster? What was her title?</b></p>

<p style="text-align: right;">Page 41</p> <p>1 A I'm not sure.</p> <p>2 <b>Q Is Donna Aultz still with Grand?</b></p> <p>3 A Yes.</p> <p>4 <b>Q What's her title now?</b></p> <p>5 A She's the CFO. No, I'm sorry, she's in --</p> <p>6 she's in charge of facilities.</p> <p>7 <b>Q Is she still involved in billing?</b></p> <p>8 A No.</p> <p>9 <b>Q When did she stop being in charge of billing?</b></p> <p>10 A I don't recall. It was -- I don't know.</p> <p>11 <b>Q More than ten years ago?</b></p> <p>12 A I don't recall. It wasn't ten years ago</p> <p>13 though.</p> <p>14 <b>Q Less --</b></p> <p>15 A It was much shorter.</p> <p>16 <b>Q Was it less than five years ago?</b></p> <p>17 A Yes.</p> <p>18 <b>Q Did she become in charge of facilities when</b></p> <p>19 <b>Grand began to provide services in Tulsa County in the</b></p> <p>20 <b>last five years?</b></p> <p>21 A Yes.</p> <p>22 <b>Q Is that why she was manager of facilities?</b></p> <p>23 A Sorry?</p> <p>24 <b>Q Is that why she was put in charge of facilities</b></p> <p>25 <b>because of the expansion into Tulsa County?</b></p>	<p style="text-align: right;">Page 43</p> <p>1 A June of '94.</p> <p>2 <b>Q When did you stop being a consultant then at</b></p> <p>3 <b>Grand?</b></p> <p>4 A June of '94.</p> <p>5 <b>Q Earlier you said 1993.</b></p> <p>6 A Sorry?</p> <p>7 <b>Q Earlier you said 1993. Was it 1993 or 1994?</b></p> <p>8 A I stand to be corrected.</p> <p>9 <b>Q So you became a consultant in June of 1993; is</b></p> <p>10 <b>that correct?</b></p> <p>11 A No, I -- I had a six-month contract.</p> <p>12 <b>Q As a -- was that as a consultant contract?</b></p> <p>13 A Yes. And it started in January and ended in</p> <p>14 June.</p> <p>15 <b>Q And were you the CFO from January to June of</b></p> <p>16 <b>1994?</b></p> <p>17 A From June of '94, yes.</p> <p>18 <b>Q You were the CFO as of June, 1994?</b></p> <p>19 A Yes.</p> <p>20 <b>Q So you weren't the CFO when you were the</b></p> <p>21 <b>consultant?</b></p> <p>22 A No.</p> <p>23 <b>Q What other training did you have regarding</b></p> <p>24 <b>federal health care programs?</b></p> <p>25 A None.</p>
<p style="text-align: right;">Page 42</p> <p>1 A No, we had 36 sites at the time, and they were</p> <p>2 not being kept up with, and air conditionings being</p> <p>3 serviced and all the stuff that needs to happen to keep</p> <p>4 a building up and running.</p> <p>5 <b>Q Did she have any duties overseeing the</b></p> <p>6 <b>expansion of services into Tulsa County?</b></p> <p>7 A No.</p> <p>8 <b>Q What about Becky Foster? Is she still with</b></p> <p>9 <b>Grand?</b></p> <p>10 A Yes.</p> <p>11 <b>Q What's her current title?</b></p> <p>12 A I don't know. I can't tell you.</p> <p>13 <b>Q Is she still working billing?</b></p> <p>14 A Yes.</p> <p>15 <b>Q So what year did you become CFO of Grand?</b></p> <p>16 A That's what I was hired to do, I think, when I</p> <p>17 first came there. Donna was not the CFO. Bruce</p> <p>18 somebody was the CFO.</p> <p>19 <b>Q And so you -- but you were brought in to be the</b></p> <p>20 <b>CFO while Bruce was the CFO?</b></p> <p>21 A I was hired by the board of directors as the</p> <p>22 position of CFO.</p> <p>23 <b>Q So was Bruce --</b></p> <p>24 A In June.</p> <p>25 <b>Q In June, 2020 -- I'm sorry, in June, 1993?</b></p>	<p style="text-align: right;">Page 44</p> <p>1 <b>Q Did you have any while you were at Grand?</b></p> <p>2 A Yes.</p> <p>3 <b>Q What kind of training did you have in 1994?</b></p> <p>4 A From Becky Foster.</p> <p>5 <b>Q Did you attend any seminars or programs</b></p> <p>6 <b>regarding billing --</b></p> <p>7 A No.</p> <p>8 <b>Q -- Medicaid or other --</b></p> <p>9 A No. Becky's the -- Becky's probably the most</p> <p>10 knowledgeable person in the state when it comes to</p> <p>11 Oklahoma Health Care Authority and billing Medicaid.</p> <p>12 <b>Q How long had she worked for Grand before you</b></p> <p>13 <b>joined?</b></p> <p>14 A I don't know.</p> <p>15 <b>Q So did -- would you just go to Becky when you</b></p> <p>16 <b>had questions about billing, or would you go to any</b></p> <p>17 <b>other resources?</b></p> <p>18 A Just to Becky.</p> <p>19 <b>Q You never consulted regulations or other agency</b></p> <p>20 <b>guidance?</b></p> <p>21 A Sorry?</p> <p>22 <b>Q You never consulted regulations or other agency</b></p> <p>23 <b>guidance regarding billing?</b></p> <p>24 A I -- I'm sure I did their manual.</p> <p>25 <b>Q Anything else?</b></p>

<p style="text-align: right;">Page 45</p> <p>1 A No.</p> <p>2 <b>Q Did you ever have any training on fraud and</b></p> <p>3 <b>abuse issues related to billing federal health care</b></p> <p>4 <b>systems?</b></p> <p>5 A I'm sorry?</p> <p>6 <b>Q Did you ever have any training regarding fraud</b></p> <p>7 <b>and abuse related to federal health care programs?</b></p> <p>8 A No. Just what was in the manual.</p> <p>9 <b>Q What manual are you talking about?</b></p> <p>10 A I'm talking about the Oklahoma Health Care</p> <p>11 Authority billing practices and the Department of Mental</p> <p>12 Health billing practices. And I can't tell you the name</p> <p>13 of the manual, but I read about it. But Becky was the</p> <p>14 expert.</p> <p>15 <b>Q How long were you CFO of Grand?</b></p> <p>16 A Maybe three years.</p> <p>17 <b>Q And what was your role after you were CFO?</b></p> <p>18 A Chief operating officer.</p> <p>19 <b>Q Did your duties change while you were CFO?</b></p> <p>20 A Yes.</p> <p>21 <b>Q How did they change?</b></p> <p>22 A Let me take that back. No, not while I was</p> <p>23 CFO.</p> <p>24 <b>Q Who did you oversee while you were CFO?</b></p> <p>25 A Billing.</p>	<p style="text-align: right;">Page 47</p> <p>1 <b>Q Who -- who reported to you when you were COO?</b></p> <p>2 A Who reported to me?</p> <p>3 <b>Q Yes.</b></p> <p>4 A Donna Aultz and Becky Foster.</p> <p>5 <b>Q When you were COO?</b></p> <p>6 A Yeah, and I also had an executive team, also</p> <p>7 HR. Basically everybody that was doing business at</p> <p>8 Grand Mental Health, I was responsible for, except</p> <p>9 therapists.</p> <p>10 <b>Q Did any of those departments or individuals</b></p> <p>11 <b>also report to the CEO while you --</b></p> <p>12 A No.</p> <p>13 <b>Q And who was on the executive team that reported</b></p> <p>14 <b>to you?</b></p> <p>15 A Christy Young. That was it in the very</p> <p>16 beginning.</p> <p>17 <b>Q What was her title?</b></p> <p>18 A She was HR director.</p> <p>19 <b>Q And then in the very beginning, how -- did it</b></p> <p>20 <b>change? Did additional people report to you on the</b></p> <p>21 <b>executive team?</b></p> <p>22 A I'm sorry?</p> <p>23 <b>Q You said in the beginning. During your role as</b></p> <p>24 <b>COO, who else reported to you as part of the executive</b></p> <p>25 <b>team?</b></p>
<p style="text-align: right;">Page 46</p> <p>1 <b>Q Who in billing? Who reported to you?</b></p> <p>2 A Becky Foster, Donna Aultz.</p> <p>3 <b>Q Anyone else? Did anyone else report to you?</b></p> <p>4 A No.</p> <p>5 <b>Q And who did you report to?</b></p> <p>6 A Charles Danley.</p> <p>7 <b>Q The CEO?</b></p> <p>8 A Yes.</p> <p>9 <b>Q And then when you became COO, how did your</b></p> <p>10 <b>duties change from being CFO?</b></p> <p>11 A I was in charge of the operations of the</p> <p>12 agency.</p> <p>13 <b>Q Who became CFO when you become COO?</b></p> <p>14 A Donna Aultz.</p> <p>15 <b>Q What were your -- what were your specific --</b></p> <p>16 <b>well, when you were COO, who did you oversee?</b></p> <p>17 A Sorry?</p> <p>18 <b>Q Who reported to you when you were COO?</b></p> <p>19 A Charles Danley.</p> <p>20 <b>Q The CEO?</b></p> <p>21 A Yes.</p> <p>22 <b>Q The CEO reported to you --</b></p> <p>23 A No.</p> <p>24 <b>Q -- when you were COO?</b></p> <p>25 A What -- rephrase -- rephrase your question.</p>	<p style="text-align: right;">Page 48</p> <p>1 A In -- in the very beginning, it was only</p> <p>2 Christy and some other people on the executive team, but</p> <p>3 I don't recall. We're talking 30 -- 28 years ago,</p> <p>4 27 years ago or whatever.</p> <p>5 <b>Q What year was that that you became COO?</b></p> <p>6 A Best guess, '97.</p> <p>7 <b>Q And why were you named COO?</b></p> <p>8 A The board made that decision.</p> <p>9 <b>Q How did that come up that they were deciding to</b></p> <p>10 <b>make a new COO?</b></p> <p>11 A I have no idea.</p> <p>12 <b>Q Was there a COO previously?</b></p> <p>13 A No.</p> <p>14 <b>Q It was a new role?</b></p> <p>15 A Sorry?</p> <p>16 <b>Q It was -- so it was a new position at Grand,</b></p> <p>17 <b>COO?</b></p> <p>18 A Yes.</p> <p>19 <b>Q What kind of projects did you work on when you</b></p> <p>20 <b>were a COO?</b></p> <p>21 A I --</p> <p>22 <b>Q Let's --</b></p> <p>23 A Several.</p> <p>24 <b>Q Let's just -- kind of going back, when you were</b></p> <p>25 <b>C -- wait, when you were the consultant, how many</b></p>

<p style="text-align: right;">Page 49</p> <p>1 <b>counties was Grand providing services in?</b></p> <p>2 A Seven.</p> <p>3 <b>Q Did that expand while you were CFO?</b></p> <p>4 A No.</p> <p>5 <b>Q What were those counties?</b></p> <p>6 A Sorry?</p> <p>7 <b>Q What were those seven counties?</b></p> <p>8 A The ones that we expanded?</p> <p>9 <b>Q No. When you were --</b></p> <p>10 A Oh, what counties were those seven?</p> <p>11 <b>Q Yes.</b></p> <p>12 A Okay. Delaware, Mayes, Craig, Washington,</p> <p>13 Rogers, Mayes and Nowata. Is that seven?</p> <p>14 <b>Q I think you said Mayes twice.</b></p> <p>15 A Oh, I did? Okay. Let's see, oh, Ottawa. Did</p> <p>16 I -- did I say Craig?</p> <p>17 <b>Q Yes.</b></p> <p>18 A Okay. How many is that?</p> <p>19 <b>Q Delaware, Mayes, Craig, Washington, Rogers,</b></p> <p>20 <b>Nowata, Ottawa; correct?</b></p> <p>21 A Yes, that's seven.</p> <p>22 <b>Q And did that change while you were CFO?</b></p> <p>23 A No.</p> <p>24 <b>Q Did that change while you were COO?</b></p> <p>25 A Yes.</p>	<p style="text-align: right;">Page 51</p> <p>1 part ways with Parkside. That's also -- should be the</p> <p>2 same -- about the same time that Family &amp; Children's</p> <p>3 Services became a C -- CMHC.</p> <p>4 <b>Q Was Grand a CMHC before it began providing</b></p> <p>5 <b>services in Tulsa County?</b></p> <p>6 A Yes.</p> <p>7 <b>Q Why did DMH want to part ways with Parkside?</b></p> <p>8 A You'd have to ask DMH.</p> <p>9 <b>Q What did they tell you?</b></p> <p>10 A Nothing.</p> <p>11 <b>Q They just said, we want to part ways with</b></p> <p>12 <b>Parkside?</b></p> <p>13 A No, they just said that -- Teri Klein said that</p> <p>14 he needed a service provider in the Tulsa area. Family</p> <p>15 &amp; Children was one of those and Grand was the other one</p> <p>16 and ACT, back then, was the other one. It's now CRS.</p> <p>17 <b>Q So why did you say that DMH wanted to part ways</b></p> <p>18 <b>with Parkside? What made you believe that?</b></p> <p>19 A Because Teri Klein came to me and said, we need</p> <p>20 somebody to provide crisis services and to take on north</p> <p>21 Tulsa.</p> <p>22 <b>Q So did anybody actually say -- did anybody</b></p> <p>23 <b>actually say --</b></p> <p>24 A Wait a minute. Sorry.</p> <p>25 MR. DEMURO: Amazon, you got a package.</p>
<p style="text-align: right;">Page 50</p> <p>1 <b>Q What additional counties did Grand serve while</b></p> <p>2 <b>you were COO?</b></p> <p>3 A Kay, Osage, Noble, Pawnee and Payne.</p> <p>4 <b>Q And did you oversee the expansion to those</b></p> <p>5 <b>counties as COO? Did you oversee the expansion to those</b></p> <p>6 <b>counties as COO?</b></p> <p>7 A Yes.</p> <p>8 <b>Q And did Grand continue to serve Delaware,</b></p> <p>9 <b>Mayes, Craig, Washington, Rogers, Nowata and Ottawa the</b></p> <p>10 <b>whole time you were COO?</b></p> <p>11 A Yes.</p> <p>12 <b>Q Did Grand ever serve patients in Tulsa County</b></p> <p>13 <b>while you were CFO or COO?</b></p> <p>14 A C -- CFO?</p> <p>15 <b>Q Either.</b></p> <p>16 A Yeah, yes.</p> <p>17 <b>Q When did Grand provide services in Tulsa County</b></p> <p>18 <b>before 1997?</b></p> <p>19 A I was COO.</p> <p>20 <b>Q What year did Grand begin providing services in</b></p> <p>21 <b>Tulsa County?</b></p> <p>22 A I believe it was 2000.</p> <p>23 <b>Q And how did that come about?</b></p> <p>24 A Let's see, Teri Klein was -- was commissioner.</p> <p>25 They had a situation with Parkside that they wanted to</p>	<p style="text-align: right;">Page 52</p> <p>1 MS. VELANDIA: Let's take a break. Go off the</p> <p>2 record.</p> <p>3 THE VIDEOGRAPHER: Off the record at 10:02 a.m.</p> <p>4 (Recess taken from 10:02 a.m. and 10:20 a.m.)</p> <p>5 THE VIDEOGRAPHER: Back on the record at</p> <p>6 10:20 a.m.</p> <p>7 <b>Q (By Ms. Velandia) You said earlier that DMH</b></p> <p>8 <b>wanted to part ways with Parkside. What was the basis</b></p> <p>9 <b>for you saying that?</b></p> <p>10 A I was not informed at -- what those bases were.</p> <p>11 You'd have to ask either Teri Klein or Rand Baker.</p> <p>12 <b>Q But who said that DMH wanted to part ways with</b></p> <p>13 <b>Parkside?</b></p> <p>14 A I'm sorry?</p> <p>15 <b>Q Who said DMH wanted to part ways with Parkside?</b></p> <p>16 A Somebody said they were going to terminate</p> <p>17 their contract. I don't know who it was.</p> <p>18 <b>Q Did they tell you why?</b></p> <p>19 A No.</p> <p>20 <b>Q Was it somebody from DMH that told you that?</b></p> <p>21 A I think it was Teri Klein, commissioner at the</p> <p>22 time.</p> <p>23 <b>Q Did they tell you anything about problems that</b></p> <p>24 <b>Parkside was having?</b></p> <p>25 A No.</p>

<p style="text-align: right;">Page 53</p> <p>1 <b>Q What did they tell you exactly? Walk me</b>  2 <b>through what they told you when you talked to them</b>  3 <b>about --</b>  4 A That we were --  5 <b>Q I'm sorry.</b>  6 A They were going to terminate the contract with  7 Parkside as a CMHC in Tulsa and that they wanted Grand  8 to come in and run the crisis center and serve north  9 Tulsa is all I know.  10 <b>Q You didn't ask why they were terminating?</b>  11 A No.  12 <b>Q You didn't ask if Parkside was having any</b>  13 <b>problems?</b>  14 A No.  15 <b>Q You didn't do any due diligence to see whether</b>  16 <b>you needed to address any problems?</b>  17 A I did due diligence to see if we could -- with  18 our board of directors and other people to make sure  19 that we could handle going into Tulsa.  20 <b>Q Walk me through the due diligence that you did.</b>  21 A I'm sorry?  22 <b>Q Walk me through that due diligence process that</b>  23 <b>you did.</b>  24 A Teri Klein was -- I spent about two weeks with  25 him looking for property that we could use as a crisis</p>	<p style="text-align: right;">Page 55</p> <p>1 A I think it was 594 -- 493 maybe. It was -- it  2 was paid fee for service.  3 <b>Q Where was that crisis center located?</b>  4 A I'm sorry?  5 <b>Q Where was that crisis center located?</b>  6 A On Harvard.  7 <b>Q North Harvard in Tulsa?</b>  8 A Yes, at Doctors' Hospital, the old hospital  9 down there.  10 <b>Q What was the cross street for Doctors'</b>  11 <b>Hospital?</b>  12 A Sorry?  13 <b>Q What was the cross street -- where -- where</b>  14 <b>approximately was it located?</b>  15 A I --  16 <b>Q Was it north of 244?</b>  17 A Oh, yeah, it was way north. I mean, way south.  18 <b>Q So it was in south Tulsa?</b>  19 A Yes, on Harvard Avenue is what I recall.  20 <b>Q Was it around 25th and Harvard?</b>  21 A Could be.  22 <b>Q Was that part of your service area as a CMHC at</b>  23 <b>that time in Tulsa County?</b>  24 A No. Our job was to run the crisis center for  25 Tulsa County.</p>
<p style="text-align: right;">Page 54</p> <p>1 center. We ended up at Doctors' Hospital out -- out on  2 Harvard and rented that and booked a space -- I think it  3 was over by -- on Peoria for our outpatient clinic for  4 north Tulsa.  5 <b>Q Did you do any due diligence to make sure that</b>  6 <b>you'd be able to provide services without -- I'm sorry,</b>  7 <b>let me -- did you do any due diligence to see how much</b>  8 <b>money would be made from providing services in north</b>  9 <b>Tulsa?</b>  10 A We looked at the contract dollars with the  11 Department of Mental Health and felt like that we could  12 afford to do it.  13 <b>Q What else did you do?</b>  14 A 25 years ago. I don't know.  15 <b>Q Did you run a pro forma?</b>  16 A No.  17 <b>Q Were those -- what kind of contract was it?</b>  18 A It was a contract to be a CMHC in Tulsa County.  19 Specifically, our role would be to run the crisis center  20 in north Tulsa.  21 <b>Q And how were the services for the crisis center</b>  22 <b>paid?</b>  23 A I'm sorry?  24 <b>Q How were the services at the crisis center</b>  25 <b>paid?</b></p>	<p style="text-align: right;">Page 56</p> <p>1 <b>Q Were the crisis center services CMHC services?</b>  2 A Sorry?  3 <b>Q Are crisis center services CMHC services?</b>  4 A Yes.  5 <b>Q And what was your service area in Tulsa County</b>  6 <b>at that time?</b>  7 A What?  8 <b>Q What was your service area in Tulsa County at</b>  9 <b>that time?</b>  10 A North Tulsa. That's all -- that's all I  11 recall. North Tulsa. And then, of course, every --  12 all -- all of Tulsa when it came to crisis.  13 <b>Q So the CMHC service area at that time for Grand</b>  14 <b>covered all of Tulsa?</b>  15 A For the crisis center.  16 <b>Q Did you have a separate contract for the crisis</b>  17 <b>center?</b>  18 A Yes, I believe so.  19 <b>Q And how were the CMHC services in north Tulsa</b>  20 <b>paid?</b>  21 A Fee for service.  22 <b>Q Was that all paid by Medicaid?</b>  23 A Medicaid and DMH.  24 <b>Q And how about -- who paid the -- for the</b>  25 <b>services for the crisis center?</b></p>

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1 A I don't really recall, but I believe that we  
 2 billed Oklahoma Health Care Authority, and we billed the  
 3 Department of Mental Health, depending on the payor of  
 4 the client.  
 5 **Q So when did Grand begin providing services in  
 6 Tulsa County after Parkside left?**  
 7 A I -- I don't remember the exact date, but I'm  
 8 pretty sure it was in 2020 -- I mean twenty -- 2000.  
 9 **Q The same year that the commissioner approached  
 10 you about --**  
 11 A Yes.  
 12 **Q -- providing services? And how long did Grand  
 13 provide services in Tulsa County after that transition?**  
 14 A I think it was a couple of years, but I can't  
 15 tell you.  
 16 **Q What was your title during that time?**  
 17 A COO.  
 18 **Q And why did Grand stop providing services in  
 19 Tulsa County at that time?**  
 20 A Charles Danley made that decision.  
 21 **Q Did you provide him any input regarding that  
 22 decision?**  
 23 A I'm sure I did.  
 24 **Q What input did you provide him?**  
 25 A That we were losing about \$750,000 a year in --

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1 no, \$750,000 for a period of time. I'm not -- I can't  
 2 recall the period of time. It was costing us 750,000  
 3 more to operate than we were getting reimbursed.  
 4 **Q Why was that?**  
 5 A We had to have 24/7 security, and the sheriff's  
 6 department was providing that security, and most of the  
 7 time it was either majors or captains that was doing  
 8 that.  
 9 **Q Why is that significant?**  
 10 A Huh?  
 11 **Q Why is that significant?**  
 12 A Because a major and a captain gets paid a whole  
 13 lot more than a corporal, and that's -- I -- I'm not  
 14 saying that's the only reason, but I'm saying that was  
 15 part of it.  
 16 **Q What are the other reasons?**  
 17 A The original contract was for \$7.5 million, if  
 18 I recall correctly, for us to go -- to operate that, so  
 19 it was way underbid -- or the Department of Mental  
 20 Health gave us less money than it took to operate it.  
 21 **Q Had Grand bid on that contract?**  
 22 A No.  
 23 **Q And that's -- you're talking about the contract  
 24 for the crisis center?**  
 25 A Sorry?

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1 **Q You're talking about the contract for the  
 2 crisis center?**  
 3 A Yeah, and north Tulsa.  
 4 **Q So DMH gave you a contract for 7.5 million to  
 5 cover the crisis center and north Tulsa?**  
 6 A I believe that's correct.  
 7 **Q So the CMHC services in north Tulsa, in  
 8 addition to the crisis center?**  
 9 A I'm sorry?  
 10 **Q That 7.5 million was the amount that was going  
 11 to be paid for the CMCH services and the crisis center?**  
 12 A Yes.  
 13 **Q If it was fee for service, was it then -- was  
 14 the 7.5 million the cap?**  
 15 A 7.5 million was the cap, if I recall correctly.  
 16 And if you find that not to be true, then -- I believe  
 17 it to be true at this point in time.  
 18 **Q Would -- would DMH have been paying part of  
 19 that and then OHCA would have been paying the -- part of  
 20 the fee for service?**  
 21 A Sorry?  
 22 **Q Was the \$7.5 million just the cap for money  
 23 coming from DMH or did it apply to the money coming from  
 24 OHCA?**  
 25 A That was DMH.

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1 **Q So was -- was OHCA paying additional funds in  
 2 addition to the 7.5 million for the fee for service?**  
 3 A For anyone that had Medicaid. And back then,  
 4 very few people had Medicaid unless you were a pregnant  
 5 woman or a child, I think.  
 6 **Q So why else was Grand losing money in Tulsa?**  
 7 A Because it cost more to provide services than  
 8 we were getting paid.  
 9 **Q And so you had -- it sounds like you had turned  
 10 this around when you joined Grand, when Grand was  
 11 serving counties outside Tulsa. Why weren't you able to  
 12 turn that around in Tulsa?**  
 13 A Sorry?  
 14 **Q Why weren't you able to turn that around in  
 15 Tulsa if you were able to turn the problems around when  
 16 you first joined Grand?**  
 17 A It costs more there to provide services than we  
 18 were getting paid.  
 19 **Q And the cost was just the security?**  
 20 A It was security and other, you know -- it was a  
 21 big job to run a crisis center in Tulsa. Everybody was  
 22 coming there from Family & Children Services, from  
 23 STAR -- let's see, it wasn't STAR mental health then. I  
 24 think it was ACT. Anytime a police officer picked  
 25 somebody up, they would bring them there.

<p style="text-align: right;">Page 61</p> <p>1 <b>Q So you were just providing a lot of services</b>  2 <b>that weren't getting reimbursed; is that correct?</b>  3 A About \$750,000 worth.  4 <b>Q And that was all related to the crisis center?</b>  5 A It was -- I believe so, yes.  6 <b>Q As a CMHC then, did you have to provide</b>  7 <b>indigent care?</b>  8 A Yes.  9 <b>Q Did you have to serve everybody that came in</b>  10 <b>your door?</b>  11 A Yes.  12 <b>Q But you weren't losing money as a CMHC? You</b>  13 <b>were losing money at crisis care center?</b>  14 A I believe that's true.  15 <b>Q So did you stop being a crisis center and a</b>  16 <b>CMHC in Tulsa at the same time?</b>  17 A Yes.  18 <b>Q Why?</b>  19 A Had a meeting with Rand Baker and asked him to  20 pay that \$750,000 loss that we would be taking, and he  21 said no. And Charles -- best I can recall in the  22 meeting, Charles looked at Rand Baker and said, when you  23 going to take it over? And TCBHC became a  24 state-operated crisis center from that day forward or  25 that -- I think we did 30-day notice. And we moved out</p>	<p style="text-align: right;">Page 63</p> <p>1 believe.  2 <b>Q What else was different about the culture</b>  3 <b>there?</b>  4 A Huh? What?  5 <b>Q What else was different about the culture</b>  6 <b>there?</b>  7 A It's a large city, but it is operated like a  8 small town.  9 <b>Q In what way?</b>  10 A Rumors, people talking, the -- the foundations  11 giving -- you know, based upon who they were giving  12 money to, those type of things.  13 <b>Q What foundations?</b>  14 A Zarrow and Kaiser, I believe.  15 <b>Q Who were they giving the money to?</b>  16 A I have no clue.  17 <b>Q Were they --</b>  18 A But --  19 <b>Q -- giving money to Grand?</b>  20 A -- they didn't give us -- they didn't give it  21 to Grand, I can tell you that.  22 <b>Q What kind -- what were the rumors that you</b>  23 <b>mentioned?</b>  24 A I don't recall the exact rumors.  25 <b>Q Generally, what do you remember about the</b></p>
<p style="text-align: right;">Page 62</p> <p>1 of north Tulsa as well.  2 <b>Q Who was Rand Baker? What was his title at that</b>  3 <b>time?</b>  4 A Deputy commissioner, I believe.  5 <b>Q At DMH?</b>  6 A Yes.  7 <b>Q How much notice did your contract to run the</b>  8 <b>crisis center require before you terminated the</b>  9 <b>contract?</b>  10 A I'm not 100 percent sure, but I would say  11 30-day notice.  12 <b>Q So you think you gave the amount of notice that</b>  13 <b>was required?</b>  14 A Yes.  15 <b>Q How about under the CMHC contract?</b>  16 A Probably the same.  17 <b>Q So you think you gave the proper amount of</b>  18 <b>notice under that contract to leave?</b>  19 A Yes.  20 <b>Q But why did you leave as a CMHC if you weren't</b>  21 <b>losing money as a CMHC?</b>  22 A It made no sense just to serve north Tulsa  23 only. It was a different culture in north Tulsa than we  24 expected and very difficult to get people in for  25 services. They mostly went to their preachers, I</p>	<p style="text-align: right;">Page 64</p> <p>1 <b>rumors?</b>  2 A A lot of talk.  3 <b>Q What were they talking about?</b>  4 A Just different stuff.  5 <b>Q What different stuff?</b>  6 A I don't recall.  7 <b>Q You don't recall anything at all about the</b>  8 <b>rumors?</b>  9 A Huh-uh.  10 <b>Q Why do you characterize them as rumors if you</b>  11 <b>can't recall what they are?</b>  12 A It was just talk, people talking.  13 <b>Q Was there any truth to the -- what they were</b>  14 <b>talking about?</b>  15 A I couldn't -- don't remember that.  16 <b>Q Were they talking about Grand?</b>  17 A I think some of it was, yes.  18 <b>Q You don't remember anything specific about what</b>  19 <b>they were saying about Grand?</b>  20 A Do what?  21 <b>Q You don't remember anything about what they</b>  22 <b>were saying about Grand at all?</b>  23 A Gail -- Gail Lapidus was the CEO of Family &amp;  24 Children's Services, and we were trying to meet with her  25 to talk about how the crisis center was operated and --</p>

<p style="text-align: right;">Page 65</p> <p>1 and we kind of started off on a bad foot, because I</p> <p>2 think that in one of those meetings, Charles looked at</p> <p>3 Gail and said, if you would shut up long enough for me</p> <p>4 to talk, we might get something done, and she got up and</p> <p>5 stomped out.</p> <p>6 <b>Q What were you trying to get done at that</b></p> <p>7 <b>meeting?</b></p> <p>8 A I -- I don't even know what we were trying to</p> <p>9 get done.</p> <p>10 <b>Q What was Gail saying?</b></p> <p>11 A I don't recall.</p> <p>12 <b>Q Are you saying that it was Gail that was</b></p> <p>13 <b>spreading rumors?</b></p> <p>14 A I don't think so. I don't believe that's what</p> <p>15 I was saying.</p> <p>16 <b>Q Why did you -- why did you bring up Gail when</b></p> <p>17 <b>you were talking about rumors then?</b></p> <p>18 A I don't know. I brought up Gail because it</p> <p>19 came to mind when we were in meetings and that one</p> <p>20 incident with Charles Danley and her, and that's the one</p> <p>21 I remember better than any of the others, except I don't</p> <p>22 know what was being said. I know that Gail was</p> <p>23 continuously talking and overtalking Charles Danley, and</p> <p>24 he, at that time, had a pretty short fuse and just told</p> <p>25 her to shut up and give him a chance to talk, is how I</p>	<p style="text-align: right;">Page 67</p> <p>1 <b>providing services in Tulsa County?</b></p> <p>2 A It was probably about halfway through, I'd</p> <p>3 guess.</p> <p>4 <b>Q And so did that meeting have anything to do</b></p> <p>5 <b>with the reason that Grand left?</b></p> <p>6 A No. I think I already answered that question</p> <p>7 on why we left.</p> <p>8 <b>Q So earlier you said that -- we were talking</b></p> <p>9 <b>about some of the reasons that Grand left, and you</b></p> <p>10 <b>talked about rumors. Why would you say that those</b></p> <p>11 <b>rumors were detrimental if you can't remember what they</b></p> <p>12 <b>were?</b></p> <p>13 A I don't know.</p> <p>14 <b>Q So are you sure that part of the reason that</b></p> <p>15 <b>you were having problems in Tulsa was rumors?</b></p> <p>16 A No. I don't -- did I say that?</p> <p>17 <b>Q You said it was one of the problems with north</b></p> <p>18 <b>Tulsa.</b></p> <p>19 A It was one of the problems in Tulsa, yes, but</p> <p>20 probably more now than it was back then. Sometimes you</p> <p>21 get your timelines mixed up.</p> <p>22 <b>Q So was it a problem when Grand was in Tulsa</b></p> <p>23 <b>around 2000?</b></p> <p>24 A Must not have been, because I don't remember it</p> <p>25 being a problem even though I said rumors was part of</p>
<p style="text-align: right;">Page 66</p> <p>1 remember it.</p> <p>2 <b>Q Were you talking about the financial problems</b></p> <p>3 <b>that Grand was having at the crisis center?</b></p> <p>4 A No.</p> <p>5 <b>Q You don't remember anything about what you were</b></p> <p>6 <b>talking about?</b></p> <p>7 A No.</p> <p>8 <b>Q You don't remember what you wanted from FCS at</b></p> <p>9 <b>that meeting?</b></p> <p>10 A I think we were required to meet with FCS by</p> <p>11 the commissioner.</p> <p>12 <b>Q What did the commissioner say when he --</b></p> <p>13 A I don't know.</p> <p>14 <b>Q You have no --</b></p> <p>15 A I said --</p> <p>16 <b>Q -- recollection at all about --</b></p> <p>17 A -- I think. I said I think.</p> <p>18 <b>Q But you have no idea why the commissioner would</b></p> <p>19 <b>require Grand to meet with FCS?</b></p> <p>20 A We were both new in Tulsa as CMHCs.</p> <p>21 <b>Q When was this meeting required by the --</b></p> <p>22 A I --</p> <p>23 <b>Q -- Department of Mental Health?</b></p> <p>24 A -- can't recall.</p> <p>25 <b>Q Was it at the beginning or the end of Grand</b></p>	<p style="text-align: right;">Page 68</p> <p>1 the problem. So I --</p> <p>2 <b>Q Was anybody else at that meeting with Gail</b></p> <p>3 <b>Lapidus?</b></p> <p>4 A Charles Danley, myself.</p> <p>5 <b>Q No one else?</b></p> <p>6 A I don't think so.</p> <p>7 <b>Q What about the other CMHC in Tulsa County? Why</b></p> <p>8 <b>weren't they at that meeting?</b></p> <p>9 A I think it was because we were both new, Family</p> <p>10 &amp; Children's Services and Grand, in Tulsa County as a</p> <p>11 CMHC.</p> <p>12 <b>Q What was the other CMHC in Tulsa County at that</b></p> <p>13 <b>time?</b></p> <p>14 A I'm not sure STAR was still there or not. ACT.</p> <p>15 I don't know. There was -- I think there was like -- at</p> <p>16 one time, there was, like, five CMHCs in Tulsa County.</p> <p>17 Parkside was one of them, but that was gone by then.</p> <p>18 <b>Q So when Charles asked Rand Baker to pay the</b></p> <p>19 <b>loss, did Rand Baker give a reason why he said no?</b></p> <p>20 A Didn't have the money.</p> <p>21 <b>Q And did you tell him at that meeting that if he</b></p> <p>22 <b>didn't get the money, you were going to leave Tulsa</b></p> <p>23 <b>County?</b></p> <p>24 A I think at that meeting is when Charles Danley</p> <p>25 looked at Rand Baker and said, when are you -- when are</p>

<p>1 you going to take over the crisis center? <span style="float: right;">Page 69</span></p> <p>2 <b>Q Did he also tell him you're not going to be a</b></p> <p>3 <b>CMHC in Tulsa County if you don't increase the contract</b></p> <p>4 <b>rate?</b></p> <p>5 A Do what?</p> <p>6 <b>Q Did Charles also tell Rand Baker that he was</b></p> <p>7 <b>going to leave Tulsa County as a CMHC?</b></p> <p>8 A I don't think so, but I don't know for sure.</p> <p>9 <b>Q Do you -- you remember talking about CMHC</b></p> <p>10 <b>services at that meeting?</b></p> <p>11 A No, we talked about the crisis center at that</p> <p>12 meeting.</p> <p>13 <b>Q After you gave your notice that you were going</b></p> <p>14 <b>to terminate the crisis center and the CMHC services,</b></p> <p>15 <b>did anybody from DMH contact you to discuss that?</b></p> <p>16 A I don't think so. The decision was made in</p> <p>17 that room that they were going to take over the crisis</p> <p>18 center.</p> <p>19 <b>Q Did anybody from the community contact you</b></p> <p>20 <b>about that issue?</b></p> <p>21 A Sorry?</p> <p>22 <b>Q Did anybody from the community contact you</b></p> <p>23 <b>about Grand leaving Tulsa County?</b></p> <p>24 A No, I don't think so.</p> <p>25 <b>Q Who became the CMHC in north Tulsa after Grand</b></p>	<p>1 A Well, I mean that it wasn't an inpatient <span style="float: right;">Page 71</span></p> <p>2 hospital. It was for crisis.</p> <p>3 <b>Q What services did it provide?</b></p> <p>4 A What crisis centers do.</p> <p>5 <b>Q What do they do? Tell me about it.</b></p> <p>6 A Okay.</p> <p>7 <b>Q I'm a lawyer, not a health care provider.</b></p> <p>8 A All right. Well, Family &amp; Children has a</p> <p>9 crisis center in their facility.</p> <p>10 <b>Q Did you provide the same services that Family &amp;</b></p> <p>11 <b>Children's Services provides now at its crisis center?</b></p> <p>12 A Yes.</p> <p>13 <b>Q So list -- can you list those services for me?</b></p> <p>14 A Take anyone who walks in the door. Police</p> <p>15 officers usually brought them in. Very few people</p> <p>16 walked in at that time for crisis. Mostly police</p> <p>17 officers brought them. And most of the time they went</p> <p>18 to the emergency room before they came to the crisis</p> <p>19 center to make sure they're medically stable and make</p> <p>20 sure their alcohol level wasn't at a certain percent.</p> <p>21 They had had LMHPs there, RNs, 24/7, and techs.</p> <p>22 <b>Q What's an LMHP?</b></p> <p>23 A Licensed mental health professional.</p> <p>24 <b>Q Can they prescribe medications?</b></p> <p>25 A No.</p>
<p>1 <b>left around 2000?</b> <span style="float: right;">Page 70</span></p> <p>2 A I believe it was Family &amp; Children's Services.</p> <p>3 <b>Q Did Grand work with them on that transition?</b></p> <p>4 A Don't recall.</p> <p>5 <b>Q Did Grand sell any property to them as part of</b></p> <p>6 <b>that transition?</b></p> <p>7 A No.</p> <p>8 <b>Q Did Grand own the property that it was using as</b></p> <p>9 <b>a CMHC --</b></p> <p>10 A No.</p> <p>11 <b>Q -- at that time? It was leasing?</b></p> <p>12 A Sorry?</p> <p>13 <b>Q You were leasing all the property?</b></p> <p>14 A Yes.</p> <p>15 <b>Q Was that crisis center all outpatient services?</b></p> <p>16 A Yes.</p> <p>17 <b>Q Do you know is TCBH -- is it TCBHC? What did</b></p> <p>18 <b>you say became the crisis center after you left?</b></p> <p>19 A I'm sorry?</p> <p>20 <b>Q What did you say was the name of the crisis</b></p> <p>21 <b>center?</b></p> <p>22 A Tulsa Center For Behavioral Health.</p> <p>23 <b>Q Is that an outpatient only facility?</b></p> <p>24 A At that time. Crisis center.</p> <p>25 <b>Q What do you mean by crisis center?</b></p>	<p>1 <b>Q Did you provide any physician services at the</b> <span style="float: right;">Page 72</span></p> <p>2 <b>crisis center?</b></p> <p>3 A Yes.</p> <p>4 <b>Q How many physicians were on staff at the crisis</b></p> <p>5 <b>center?</b></p> <p>6 A I don't recall.</p> <p>7 <b>Q So what would Grand do once the police brought</b></p> <p>8 <b>somebody in?</b></p> <p>9 A They would wait for the police officers to</p> <p>10 un cuff them. Once they were uncuffed, we would assign</p> <p>11 them with a bed, have the doctor see them, have the</p> <p>12 therapist see them, and try to determine what their real</p> <p>13 needs were and provide those needs, meet those needs.</p> <p>14 <b>Q Did you say you'd strap them to the bed?</b></p> <p>15 A What?</p> <p>16 <b>Q Did you say you would strap them to the bed?</b></p> <p>17 A No.</p> <p>18 <b>Q Oh, I thought I heard that.</b></p> <p>19 A We -- we provided a bed.</p> <p>20 <b>Q You provided a bed. Okay. And why was it</b></p> <p>21 <b>important that they were taken to the emergency room</b></p> <p>22 <b>first?</b></p> <p>23 A Sorry?</p> <p>24 <b>Q Why was it important that they were taken to</b></p> <p>25 <b>the emergency room before they were taken to the crisis</b></p>

<p>1 center? Page 73</p> <p>2 A To make sure they were medically stable. We --</p> <p>3 we were not a inpatient unit and we were not a inpatient</p> <p>4 hospital. We -- we treated mental health, and it was a</p> <p>5 practice.</p> <p>6 <b>Q So would it be a -- a -- a violation of a rule</b></p> <p>7 <b>or a statute to take them into the crisis care center if</b></p> <p>8 <b>they weren't medically stable?</b></p> <p>9 MR. RATCLIFF: Object to the form. Answer --</p> <p>10 answer if you know.</p> <p>11 THE WITNESS: Repeat it.</p> <p>12 MS. VELANDIA: Can you repeat my question,</p> <p>13 please?</p> <p>14 (Reporter read back requested portion.)</p> <p>15 THE WITNESS: No. We just didn't ever do it.</p> <p>16 <b>Q (By Ms. Velandia) And why not?</b></p> <p>17 A We were not a hospital. We felt like, you</p> <p>18 know, if somebody had a -- 3.8, I think, was the limit</p> <p>19 on alcohol in them. If they blew more than 3.8, then</p> <p>20 they had to be stabilized at the hospital before we</p> <p>21 would take them.</p> <p>22 <b>Q So was it because it would be dangerous for the</b></p> <p>23 <b>patient for you to admit them at the crisis care center</b></p> <p>24 <b>before they were medically stable?</b></p> <p>25 A No.</p>	<p>1 question. Page 75</p> <p>2 A Best practices at that time. Not anymore, but</p> <p>3 at that time, best practice was to make sure somebody is</p> <p>4 medically stable before we let a police officer just</p> <p>5 drop them off.</p> <p>6 <b>Q What does best practices mean?</b></p> <p>7 A Sorry?</p> <p>8 <b>Q What does best practices mean?</b></p> <p>9 A God. Standard of care.</p> <p>10 <b>Q Okay. We kind of went down a tangent, so</b></p> <p>11 <b>let's -- going back to when you first became CFO or were</b></p> <p>12 <b>a consultant, you said that you got them -- got Grand to</b></p> <p>13 <b>change -- to bill Medicaid more instead of DMH, how did</b></p> <p>14 <b>you do that? Just walk me through how you did that.</b></p> <p>15 A No, I don't recall.</p> <p>16 <b>Q You don't recall anything about what you did?</b></p> <p>17 A 25 years ago. No.</p> <p>18 <b>Q Did you talk to anybody about it?</b></p> <p>19 A About what?</p> <p>20 <b>Q Billing Medicaid.</b></p> <p>21 A Oklahoma Health Care Authority.</p> <p>22 <b>Q What did you --</b></p> <p>23 A Debbie Ogles.</p> <p>24 <b>Q Who's Debbie Ogles?</b></p> <p>25 A Debbie Ogles is somebody that used to work at</p>
<p>1 <b>Q Then why was it?</b> Page 74</p> <p>2 A Our policy.</p> <p>3 MR. DEMURO: Object to form. Argumentative.</p> <p>4 <b>Q (By Ms. Velandia) You can answer.</b></p> <p>5 A Our policy.</p> <p>6 <b>Q And why did you have those policies?</b></p> <p>7 MR. DEMURO: Object to form. Argumentative.</p> <p>8 <b>Q (By Ms. Velandia) You can answer.</b></p> <p>9 A Answer your -- what was the question?</p> <p>10 <b>Q Why would you have that as a policy? What's</b></p> <p>11 <b>the reason for the policy? Is it a medical reason?</b></p> <p>12 A It was --</p> <p>13 <b>Q Is it a financial reason?</b></p> <p>14 A It was a practice.</p> <p>15 MR. DEMURO: Same objection. Argumentative.</p> <p>16 <b>Q (By Ms. Velandia) Why?</b></p> <p>17 MR. DEMURO: Same objection.</p> <p>18 THE WITNESS: Why was it a --</p> <p>19 <b>Q (By Ms. Velandia) Yeah. What --</b></p> <p>20 A -- practice?</p> <p>21 <b>Q Why would you put a -- why would you have that</b></p> <p>22 <b>practice in place?</b></p> <p>23 MR. DEMURO: Same objection.</p> <p>24 <b>Q (By Ms. Velandia) You can answer the question.</b></p> <p>25 <b>He's objecting for the record, but you can answer the</b></p>	<p>1 the Oklahoma Health Care Authority. Page 76</p> <p>2 <b>Q And what specifically did you discuss with her?</b></p> <p>3 A Talked about the rules, exactly how much it</p> <p>4 paid, how we had to bill it. There was not a lot of</p> <p>5 crisis centers in the State of Oklahoma at that point</p> <p>6 that was not state operated.</p> <p>7 <b>Q So are you talking about a crisis center that</b></p> <p>8 <b>Grand was running when you joined Grand?</b></p> <p>9 A I'm talking about the TCBH.</p> <p>10 <b>Q Okay. So I'm going back. I'm kind of going</b></p> <p>11 <b>back, because we kind of went down that path. But I'm</b></p> <p>12 <b>going back to when you first started at Grand. Remember</b></p> <p>13 <b>you said you were hired and that one of the things you</b></p> <p>14 <b>did was you started having Grand bill Medicaid more than</b></p> <p>15 <b>DMH because they weren't getting paid much from DMH;</b></p> <p>16 <b>right? So how did you -- how did you do that?</b></p> <p>17 A We geofenced basically where the Medicaid</p> <p>18 clients were living, went through the -- went and -- to</p> <p>19 the low income housing, health department, places where</p> <p>20 people that would qualify for Medicaid would be living</p> <p>21 or be at.</p> <p>22 <b>Q What's geofencing mean?</b></p> <p>23 A Do what?</p> <p>24 <b>Q What does geofencing mean? Did you say</b></p> <p>25 <b>geofencing?</b></p>

<p>Page 77</p> <p>1 A Oh, geofencing is like a process where you look 2 and see where populations live and -- I don't think we 3 did geofencing in 2020 -- I mean, in 2000, but we -- 4 we -- we did go to the low income housing and served a 5 lot more children than we ever served before. 6 Because -- 7 <b>Q So --</b> 8 A -- 90 percent of the children have Medicaid in 9 Oklahoma. 10 <b>Q So what do you mean when you say you went to</b> 11 <b>the low income housing?</b> 12 A There was low income housing, and that's where 13 we went and we talked to the people that were there 14 about providing services for them, and -- and if they 15 needed services, then we would provide those services. 16 <b>Q So did Grand set up an office --</b> 17 A No. 18 <b>Q -- in the low income housing centers?</b> 19 A No. 20 <b>Q Were you talking to the potential patients or</b> 21 <b>were you talking to the owners of the low income</b> 22 <b>housing?</b> 23 A The people that lived there. 24 <b>Q Okay. And who went out -- what kind of -- what</b> 25 <b>kind of staff was sent out there?</b></p>	<p>Page 79</p> <p>1 help. 2 <b>Q So, I mean, how -- how did you get in? I -- I</b> 3 <b>imagine you didn't just walk into the classroom.</b> 4 A I -- 5 <b>Q Did they schedule --</b> 6 A I didn't go in. I didn't go to any schools. 7 Staff did. 8 <b>Q But you were overseeing them; right?</b> 9 A Yes. 10 <b>Q So did they go in and say, we'll provide</b> 11 <b>services to the kids in the school? I'm just trying to</b> 12 <b>figure out how you go to schools and provide services.</b> 13 A I assume. 14 <b>Q And then did you provide the services at the</b> 15 <b>housing facility and at the health department, or did</b> 16 <b>you say, come into our office?</b> 17 A Came into our office. 18 <b>Q So Grand wasn't providing any services in the</b> 19 <b>field or outside your office at that time?</b> 20 A We were in the schools. 21 <b>Q And that's the only place?</b> 22 A I believe so. 23 <b>Q So how did Grand determine -- when it saw</b> 24 <b>somebody in a housing -- in a low income housing area or</b> 25 <b>in the health department, how did Grand determine who to</b></p>
<p>Page 78</p> <p>1 A Therapists. 2 <b>Q And then you said you went to the health</b> 3 <b>department?</b> 4 A Yes. 5 <b>Q Was that also therapists that went to the</b> 6 <b>health department?</b> 7 A Yes. 8 <b>Q To see if there were potential clients there?</b> 9 A Do what? 10 <b>Q To see if there were clients there that might</b> 11 <b>need services?</b> 12 A The health department was a place where a lot 13 of Medicaid mothers and people that had Medicaid would 14 go. 15 <b>Q So -- so Grand sent clinicians out to the</b> 16 <b>health department to talk to people to see if they</b> 17 <b>needed to receive mental health services?</b> 18 A Yes. 19 <b>Q What other places did Grand go to -- to do</b> 20 <b>that?</b> 21 A I don't recall. Schools. 22 <b>Q How did you get in to see the kids at the</b> 23 <b>schools?</b> 24 A We talked to the principal and the 25 superintendent of schools. They were needing a lot of</p>	<p>Page 80</p> <p>1 <b>approach? Or did you just approach everybody?</b> 2 A Everyone. 3 <b>Q And then how did they -- how was it that they</b> 4 <b>got them to Grand's clinic? Did they give them a card,</b> 5 <b>did they give them a ride, give them bus fare?</b> 6 A I don't recall. We're talking about what year? 7 <b>Q This is when you were CFO.</b> 8 A Oh. I believe that we gave them a card, but 9 I'm not 100 percent sure. 10 <b>Q Did that change over time while you were</b> 11 <b>working at Grand?</b> 12 A Yeah, yes. 13 <b>Q How did it change? What other --</b> 14 A It changed because we embedded a therapist at 15 the schools where they were there -- when the school was 16 open, we were there, and a behavioral health coach. 17 <b>Q What about at the low -- the low income housing</b> 18 <b>areas?</b> 19 A That never changed. 20 <b>Q It was always just giving them a card? You</b> 21 <b>think it was just giving them a card?</b> 22 A I believe so. I'm not sure. 23 <b>Q What else could it have been if it wasn't a</b> 24 <b>card?</b> 25 A It could have been a flier that we developed.</p>

<p style="text-align: right;">Page 81</p> <p>1 <b>Q What did the flier say?</b></p> <p>2 A I don't know. Come on.</p> <p>3 <b>Q Did it have the address of your facilities?</b></p> <p>4 A I'm sure it did.</p> <p>5 <b>Q How did the -- the clinicians that went out,</b></p> <p>6 <b>how did they clinically determine that somebody needed</b></p> <p>7 <b>to get in -- come in to get services?</b></p> <p>8 A You would have to ask one of the LMHPs.</p> <p>9 <b>Q But you oversaw them; right?</b></p> <p>10 A No, actually Dr. Hackworth -- Janet Hackworth</p> <p>11 actually oversaw them. I oversaw -- I oversaw the stuff</p> <p>12 that was non-clinical, and we had a PhD psychologist</p> <p>13 that was making the clinical decisions. She sat on the</p> <p>14 executive team with me.</p> <p>15 <b>Q So -- so you were in charge of them going out</b></p> <p>16 <b>into the areas where Medicaid patients would be and</b></p> <p>17 <b>seeing if they needed services and Janet was over how to</b></p> <p>18 <b>determine that they should come into the clinic; is that</b></p> <p>19 <b>right?</b></p> <p>20 A Yes.</p> <p>21 <b>Q And why didn't -- why wasn't Grand going out to</b></p> <p>22 <b>areas were there -- where people that weren't covered by</b></p> <p>23 <b>Medicaid? Let me ask that a better way. Why was Grand</b></p> <p>24 <b>only going to the places where there were Medicaid</b></p> <p>25 <b>patients?</b></p>	<p style="text-align: right;">Page 83</p> <p>1 we just went somewhere -- it was just we would go into</p> <p>2 the places where we believe that Medicaid clients would</p> <p>3 be at, the health department, low income housing, the</p> <p>4 schools.</p> <p>5 <b>Q So what was the goal? What was the reasoning</b></p> <p>6 <b>behind going to the places where the Medicaid members</b></p> <p>7 <b>lived?</b></p> <p>8 MR. RATCLIFF: Objection. You've asked that</p> <p>9 numerous times.</p> <p>10 <b>Q (By Ms. Velandia) You can still answer. I</b></p> <p>11 <b>don't think it got fully answered.</b></p> <p>12 A Same answer I gave before.</p> <p>13 <b>Q What was that?</b></p> <p>14 A Funny.</p> <p>15 <b>Q Well, he can object that it's asked and</b></p> <p>16 <b>answered and he's getting that on the record, but I need</b></p> <p>17 <b>a reminder --</b></p> <p>18 A Yeah.</p> <p>19 <b>Q -- because there were a lot of objections.</b></p> <p>20 A What was the question?</p> <p>21 <b>Q What was the purpose -- what was the goal when</b></p> <p>22 <b>Grand started going out to places where it had</b></p> <p>23 <b>determined Medicaid members were?</b></p> <p>24 A We only had so much DMH funds, and we were</p> <p>25 doing a lot of charity care in there, so we needed to</p>
<p style="text-align: right;">Page 82</p> <p>1 MR. DEMURO: Object to form. Can we get a time</p> <p>2 frame for any of these questions?</p> <p>3 MS. VELANDIA: Yeah, I'm talking about the time</p> <p>4 when he was CFO.</p> <p>5 MR. DEMURO: The entire time he was CFO?</p> <p>6 THE WITNESS: That three years I was CFO from</p> <p>7 ninety -- it would be from '94 to '97, I believe, is --</p> <p>8 I was CFO from that period of time.</p> <p>9 MR. DEMURO: Thank you.</p> <p>10 THE WITNESS: Three years.</p> <p>11 MR. DEMURO: Thanks.</p> <p>12 THE WITNESS: Now, what was your question?</p> <p>13 MS. VELANDIA: Can you read back my question,</p> <p>14 please? Well, I think I -- I'll say it. I'll say it.</p> <p>15 <b>Q (By Ms. Velandia) So -- so this was all part of</b></p> <p>16 <b>your work that you did to turn Grand financially around;</b></p> <p>17 <b>correct?</b></p> <p>18 A It was part of the strategy, yes.</p> <p>19 <b>Q And that strategy was to go to the areas where</b></p> <p>20 <b>Medicaid patients are to find Medicaid patients that</b></p> <p>21 <b>need services, so they can --</b></p> <p>22 A And --</p> <p>23 <b>Q -- come to your clinic?</b></p> <p>24 A -- and everywhere a Medicaid client was, there</p> <p>25 was also an indigent client there also, so it's not just</p>	<p style="text-align: right;">Page 84</p> <p>1 balance that out with people that had Medicaid so we</p> <p>2 could afford to stay open and -- and operate.</p> <p>3 <b>Q All right. Because the Medicaid paid better;</b></p> <p>4 <b>right?</b></p> <p>5 A Didn't pay -- no, it paid the same.</p> <p>6 <b>Q But it -- that would increase your income by</b></p> <p>7 <b>having Medicaid patients in addition to indigent?</b></p> <p>8 A Say what?</p> <p>9 <b>Q That would increase the income, though, by</b></p> <p>10 <b>having more Medicaid patients; correct?</b></p> <p>11 A Yes.</p> <p>12 <b>Q And there's no cap on the number of fee for</b></p> <p>13 <b>service -- services you can bill for the Medicaid</b></p> <p>14 <b>patients; correct?</b></p> <p>15 A I don't know if it was while I was C -- COO,</p> <p>16 but we had, like, RVUs, rules of value units, so if a</p> <p>17 person qualified to be a Level 4 client, for example,</p> <p>18 they could receive a lot more services, and if somebody</p> <p>19 was a walking well, then they -- then there was -- those</p> <p>20 services were reduced that we could provide.</p> <p>21 <b>Q But there wasn't a cap on the number of clients</b></p> <p>22 <b>that you could have?</b></p> <p>23 A No.</p> <p>24 <b>Q For Medicaid?</b></p> <p>25 A We're there to serve the communities.</p>

<p style="text-align: right;">Page 85</p> <p>1 <b>Q Okay. Kind of -- kind of just going back to</b></p> <p>2 <b>when you were CFO again, when you came in and they</b></p> <p>3 <b>brought you in to improve what was going on, why was it</b></p> <p>4 <b>important that you knew what the software -- that you</b></p> <p>5 <b>knew the software at that time?</b></p> <p>6 MR. DEMURO: Object to form.</p> <p>7 <b>Q (By Ms. Velandia) When you came in -- go ahead</b></p> <p>8 <b>and answer my question.</b></p> <p>9 MR. DEMURO: Object to the form of the</p> <p>10 question.</p> <p>11 <b>Q (By Ms. Velandia) You can answer it.</b></p> <p>12 A What was the question?</p> <p>13 MS. VELANDIA: Can you read back my question,</p> <p>14 please?</p> <p>15 (Reporter read back requested portion.)</p> <p>16 MR. DEMURO: Same objection.</p> <p>17 THE WITNESS: Had to know the capabilities of</p> <p>18 the software, whether you could put a -- for example,</p> <p>19 whether you could put an RVU in there and -- and it</p> <p>20 would show you exactly how many services you could</p> <p>21 provide to a client. Those are important things. And</p> <p>22 it was all housed in the software.</p> <p>23 <b>Q (By Ms. Velandia) Okay. Okay. That makes</b></p> <p>24 <b>sense. What else? What other capabilities were</b></p> <p>25 <b>important?</b></p>	<p style="text-align: right;">Page 87</p> <p>1 A Operation --</p> <p>2 <b>Q -- allowed you to do that? What's that?</b></p> <p>3 A It would -- it would show whether we were loop</p> <p>4 making or losing money and where -- which county that</p> <p>5 was in and a lot of other stuff like that.</p> <p>6 <b>Q What do you mean by loop making?</b></p> <p>7 A Huh?</p> <p>8 <b>Q What do you mean by loop making?</b></p> <p>9 A Well, your financials usually tell you whether</p> <p>10 you're losing money or not. And we had seven counties</p> <p>11 at that time, and we were looking at the financials,</p> <p>12 which is in the software, to determine which county was</p> <p>13 financially solvent and which ones were not.</p> <p>14 <b>Q And then what changes were made based on that</b></p> <p>15 <b>information?</b></p> <p>16 A Whether we were going out to low income</p> <p>17 housing, health departments and -- and schools.</p> <p>18 <b>Q And just to clarify, did you use the term loop</b></p> <p>19 <b>making earlier?</b></p> <p>20 A Do what?</p> <p>21 <b>Q Did you say loop making earlier? I thought I</b></p> <p>22 <b>heard you say loop making. Okay.</b></p> <p>23 A What?</p> <p>24 <b>Q I thought you were using a term of art that I</b></p> <p>25 <b>didn't know.</b></p>
<p style="text-align: right;">Page 86</p> <p>1 A What?</p> <p>2 <b>Q What other capabilities were important?</b></p> <p>3 A In the software?</p> <p>4 <b>Q Right. Yes.</b></p> <p>5 MR. DEMURO: Again, time frame here is when he</p> <p>6 was CFO?</p> <p>7 MS. VELANDIA: Yes.</p> <p>8 MR. DEMURO: So you're asking what capabilities</p> <p>9 in the software from 1994 to 1997 were important to him?</p> <p>10 MS. VELANDIA: Yes.</p> <p>11 THE WITNESS: The software not only done</p> <p>12 clinical -- all the clinical stuff, it also kept the</p> <p>13 financial stuff. Echo software does both. They're not</p> <p>14 just clinical software. They are a billing, financial</p> <p>15 operation, anything that you needed to do was on the</p> <p>16 computer and -- and part of that software.</p> <p>17 <b>Q (By Ms. Velandia) So what did -- what did you</b></p> <p>18 <b>learn from the -- the financial information in Echo that</b></p> <p>19 <b>helped you solve the problems at Grand at that time?</b></p> <p>20 A The financial reports was coming out of the</p> <p>21 Echo software.</p> <p>22 <b>Q What was in the financial reports that you</b></p> <p>23 <b>need -- I'm just trying to figure out -- it sounds like</b></p> <p>24 <b>you really turned them around. I'm trying to figure out</b></p> <p>25 <b>how and what specifically --</b></p>	<p style="text-align: right;">Page 88</p> <p>1 A No, I don't --</p> <p>2 <b>Q I guess I just misunderstood you.</b></p> <p>3 A -- think I used that term.</p> <p>4 <b>Q Okay. Okay. So what else was important for</b></p> <p>5 <b>you to know about the software to help you fix the</b></p> <p>6 <b>problems at Grand when you became CFO?</b></p> <p>7 A That's why it's called software, because it</p> <p>8 gathers information and then you can request the</p> <p>9 information out of it and it would do that. It would --</p> <p>10 number of clients, number of people that had Medicaid,</p> <p>11 number of people that had DMH, number of people that had</p> <p>12 Medicare, number of people that -- all the -- all these</p> <p>13 things that you would have to have to operate a -- a</p> <p>14 mental health facility was there.</p> <p>15 <b>Q But what was the most -- so -- but what were</b></p> <p>16 <b>the most important -- what was the most important</b></p> <p>17 <b>information that was in there to help you solve the</b></p> <p>18 <b>problems that were going on at Grand when you were CFO?</b></p> <p>19 A Those things I just mentioned.</p> <p>20 MR. DEMURO: Object to the form of the</p> <p>21 question.</p> <p>22 MS. VELANDIA: Let's take a break. We're about</p> <p>23 two hours in.</p> <p>24 THE VIDEOGRAPHER: Off the record at 11:10</p> <p>25 a.m.</p>

<p style="text-align: right;">Page 89</p> <p>1 (Recess taken from 11:10 a.m. to 11:23 a.m.)</p> <p>2 THE VIDEOGRAPHER: Back on the record at</p> <p>3 11:23 a.m.</p> <p>4 <b>Q (By Ms. Velandia) I just want to clarify, I</b></p> <p>5 <b>said -- I think I said something about two hours on the</b></p> <p>6 <b>record. We've been, we just confirmed, on the record</b></p> <p>7 <b>for an hour and 50 minutes. So I should have covered</b></p> <p>8 <b>this in the ground rules. So sometimes your attorney is</b></p> <p>9 <b>going to object, sometimes other attorneys are going to</b></p> <p>10 <b>object. Unless your attorney tells you not to answer,</b></p> <p>11 <b>you're still required to answer.</b></p> <p>12 A Okay.</p> <p>13 <b>Q So they're just -- they're saying it because</b></p> <p>14 <b>they're getting it on the record for if this goes to</b></p> <p>15 <b>trial later, whether or not we get it in, but it doesn't</b></p> <p>16 <b>affect your requirement to answer; okay?</b></p> <p>17 A It does mess with my brain.</p> <p>18 <b>Q It messes with your brain?</b></p> <p>19 A Yes, because --</p> <p>20 <b>Q Yeah.</b></p> <p>21 A -- I'm hearing the different noises and</p> <p>22 different people saying stuff, but that's okay. I mean,</p> <p>23 I -- so -- so when I say, can you repeat that, it's</p> <p>24 usually after somebody objects.</p> <p>25 <b>Q So okay. Let's go into -- let's go into the</b></p>	<p style="text-align: right;">Page 91</p> <p>1 <b>that right?</b></p> <p>2 A I'm sorry?</p> <p>3 <b>Q What was Josh Cantwell in charge of?</b></p> <p>4 A As a COO, he was responsible for all</p> <p>5 operations, chief operating officer.</p> <p>6 <b>Q And who was under Josh Cantwell?</b></p> <p>7 A Jeff Harlin, Kim Hill, Matt Spencer. The CFO</p> <p>8 is now Jared Sawyer. I'm trying to go around the table</p> <p>9 here.</p> <p>10 <b>Q When did Jeff --</b></p> <p>11 A HR is responsible to him.</p> <p>12 <b>Q Anyone else?</b></p> <p>13 A Not that I can think of right now, but I'm just</p> <p>14 trying to name the people that's sitting around a table</p> <p>15 here; right?</p> <p>16 <b>Q When did Jared Sawyer become CFO?</b></p> <p>17 A Maybe October? September, October. Before</p> <p>18 that, Dashun Monk was the CFO.</p> <p>19 <b>Q How do you spell Dashun's name?</b></p> <p>20 A D, dash -- Dashun, S-H-U-N.</p> <p>21 <b>Q And when did Dashun Monk become CFO?</b></p> <p>22 A I don't know the exact date.</p> <p>23 <b>Q Who was the CFO before Dashun Monk was CFO?</b></p> <p>24 A Donna Aultz.</p> <p>25 <b>Q You said Dashun Monk left in October of 2024;</b></p>
<p style="text-align: right;">Page 90</p> <p>1 <b>second time that Tulsa -- that Grand came in -- into</b></p> <p>2 <b>Tulsa County. Were you the COO at that time or CFO?</b></p> <p>3 A I think the CEO. I've been CEO for five years</p> <p>4 in March, so you can count it back, and whenever that</p> <p>5 happened is what my position was.</p> <p>6 <b>Q Around 2019?</b></p> <p>7 A I believe so.</p> <p>8 <b>Q Before COVID?</b></p> <p>9 A Yes.</p> <p>10 <b>Q And who was CEO before you?</b></p> <p>11 A Charles Danley.</p> <p>12 <b>Q And when you were CEO, who reported to you?</b></p> <p>13 A Dr. Hack -- Hackworth, HR, Donna Aultz as a --</p> <p>14 she was named CFO.</p> <p>15 <b>Q Anyone else?</b></p> <p>16 A When I was --</p> <p>17 <b>Q CEO.</b></p> <p>18 A -- CEO. Josh Cantwell, COO, mainly is the main</p> <p>19 person that reported to me, and he was responsible for</p> <p>20 as is -- as is COO of same thing I was responsible for,</p> <p>21 and that's this running the agency. And he has several</p> <p>22 people -- I think he has ten people on his executive</p> <p>23 team.</p> <p>24 <b>Q Now, you just said -- I don't know if I heard</b></p> <p>25 <b>you correctly. He was responsible of SCCSO? Did I hear</b></p>	<p style="text-align: right;">Page 92</p> <p>1 <b>is that correct?</b></p> <p>2 A I don't remember the exact dates or month.</p> <p>3 <b>Q It was in 2024, though?</b></p> <p>4 A Yes.</p> <p>5 <b>Q Why did Dashun leave?</b></p> <p>6 A He was actually terminated.</p> <p>7 <b>Q Why was he terminated?</b></p> <p>8 A For lying to me.</p> <p>9 <b>Q What did he lie to you about?</b></p> <p>10 A About how much money was in accounts payable,</p> <p>11 how much money was as accounts payable. He also -- when</p> <p>12 he -- when he would receive money -- when he would</p> <p>13 receive a bill, he kept it himself until it was verified</p> <p>14 that it was a legitimate bill. And that caused us to</p> <p>15 not have in our AP about \$810,000. So stuff that -- he</p> <p>16 was very good at Excel, but I'm not sure he even -- I</p> <p>17 don't -- I'm just not sure. I mean, just didn't have</p> <p>18 the ability to do the job.</p> <p>19 <b>Q Did he lie about anything else?</b></p> <p>20 A Yeah. I went to Stillwater, and at our</p> <p>21 Stillwater property was -- had a lien against it, and he</p> <p>22 didn't -- I say he lied. He just didn't inform me of</p> <p>23 that.</p> <p>24 <b>Q Why did it have a lien against it?</b></p> <p>25 A Sorry?</p>

<p>Page 93</p> <p>1 <b>Q Why did it have a lien against it?</b></p> <p>2 A Because we have a line of credit, and the line</p> <p>3 of credit is backed up by the Stillwater property.</p> <p>4 <b>Q And so had Grand defaulted on that line of</b></p> <p>5 <b>credit?</b></p> <p>6 A If we defaulted on the line of credit, the</p> <p>7 Stillwater facility would belong to the bank.</p> <p>8 <b>Q But was the lien on the building because Grand</b></p> <p>9 <b>had failed to pay the line of credit on time?</b></p> <p>10 A No.</p> <p>11 <b>Q Why was there a lien on it?</b></p> <p>12 A The bank required it.</p> <p>13 <b>Q Oh, so he -- so Dashun agreed to a lien on the</b></p> <p>14 <b>property without telling you that?</b></p> <p>15 A That's correct.</p> <p>16 <b>Q Okay.</b></p> <p>17 A Other than that, he was a nice guy.</p> <p>18 <b>Q What were your concerns about what he did with</b></p> <p>19 <b>Excel?</b></p> <p>20 A The what?</p> <p>21 <b>Q Did you have concerns about what he did with</b></p> <p>22 <b>Excel?</b></p> <p>23 A No. He was -- he was an expert at Excel.</p> <p>24 <b>Q Did he lie to you about anything else?</b></p> <p>25 A Not that I can think of.</p>	<p>Page 95</p> <p>1 I -- don't know if he did say that. If you want to</p> <p>2 quote him, we need to go back through the transcript.</p> <p>3 MS. VELANDIA: Well, that's my understanding.</p> <p>4 I don't --</p> <p>5 MR. RATCLIFF: Well, you're saying it as a</p> <p>6 fact.</p> <p>7 MS. VELANDIA: He can -- he can answer the</p> <p>8 question. I don't think we need to go back. He can</p> <p>9 tell me if I'm right or wrong.</p> <p>10 <b>Q (By Ms. Velandia) Were you trained by Donna</b></p> <p>11 <b>Aultz on -- on medical billing?</b></p> <p>12 A No.</p> <p>13 <b>Q Were you trained by Becky Foster on medical</b></p> <p>14 <b>billing?</b></p> <p>15 A You train dogs. You educate people.</p> <p>16 <b>Q Were you educated by Donna Aultz on medical</b></p> <p>17 <b>billing?</b></p> <p>18 A No.</p> <p>19 <b>Q Were you educated by Becky Foster on medical</b></p> <p>20 <b>billing?</b></p> <p>21 A Yes.</p> <p>22 <b>Q So why was Donna Aultz moved from CFO to</b></p> <p>23 <b>director of facilities?</b></p> <p>24 A We brought in Dashun Monk at the recommendation</p> <p>25 of -- he was one of the people that -- that was</p>
<p>Page 94</p> <p>1 <b>Q Did he oversee billing at Grand?</b></p> <p>2 A Yes.</p> <p>3 <b>Q Did you have any concerns about his work</b></p> <p>4 <b>related to the billing?</b></p> <p>5 A No, because I depended on Becky Foster to make</p> <p>6 sure that was done, and done correctly.</p> <p>7 <b>Q And so kind of going back, when Donna Aultz was</b></p> <p>8 <b>made chief of facilities, why was she made chief of</b></p> <p>9 <b>facilities if she's one of the most knowledgeable people</b></p> <p>10 <b>on billing in Oklahoma?</b></p> <p>11 A Becky Foster, not Donna Aultz, is a expert in</p> <p>12 billing.</p> <p>13 <b>Q Okay. Earlier you said Donna Aultz.</b></p> <p>14 A I did? I don't think so, but I -- if I did, I</p> <p>15 did, but Becky Foster is the expert in billing.</p> <p>16 <b>Q So did Donna Aultz train you in billing? Did</b></p> <p>17 <b>she train you in billing medical services?</b></p> <p>18 A I don't know what you mean by train.</p> <p>19 <b>Q You said earlier that you got trained by Donna</b></p> <p>20 <b>Aultz and Becky Foster.</b></p> <p>21 A We -- oh, I'm sorry. Go ahead.</p> <p>22 <b>Q So you said that earlier, so -- but now you</b></p> <p>23 <b>seem to be changing that. Did you get trained by Donna</b></p> <p>24 <b>Aultz --</b></p> <p>25 MR. RATCLIFF: I'm going to object, because</p>	<p>Page 96</p> <p>1 recommended to us, and we brought him in as our CFO and</p> <p>2 moved Donna -- Donna was in charge of CFO, as well as</p> <p>3 facilities, and it was just overwhelming job. So we</p> <p>4 basically split that job.</p> <p>5 <b>Q And I think earlier -- do you remember the year</b></p> <p>6 <b>that she was made director of facilities?</b></p> <p>7 A I'm sorry?</p> <p>8 <b>Q Do you remember what year she was made director</b></p> <p>9 <b>of facilities?</b></p> <p>10 A No.</p> <p>11 <b>Q When did Grand start providing services in</b></p> <p>12 <b>Tulsa County again after it left around 2002?</b></p> <p>13 A I can't remember the exact date, but we came in</p> <p>14 as a -- under Chapter 23.</p> <p>15 <b>Q What's Chapter 23?</b></p> <p>16 A Private provider.</p> <p>17 <b>Q What does that mean?</b></p> <p>18 A Sorry?</p> <p>19 <b>Q What does that mean?</b></p> <p>20 A You can -- as a private provider -- as a</p> <p>21 private provider, you just have to have a contract with</p> <p>22 the Oklahoma Health Care Authority, you don't have a</p> <p>23 contract with the Department of Mental Health. And</p> <p>24 Chapter 23 allows private providers -- allows you to</p> <p>25 bill for services anywhere.</p>

<p>Page 97</p> <p>1 <b>Q Chapter 23 of what?</b></p> <p>2 A Do what?</p> <p>3 <b>Q What's Chapter 23? What -- what is that a</b></p> <p>4 <b>chapter of?</b></p> <p>5 A I believe it is the private provider chapter</p> <p>6 that speaks to a individual therapist or a group to</p> <p>7 provide mental health services.</p> <p>8 <b>Q Is it a chapter of Oklahoma Statutes, Oklahoma</b></p> <p>9 <b>regulations?</b></p> <p>10 A I have no clue. I just -- I just remembered</p> <p>11 people talking about Chapter 23.</p> <p>12 <b>Q Why were they talking about Chapter 23?</b></p> <p>13 MR. DEMURO: Object to the form of the</p> <p>14 question.</p> <p>15 <b>Q (By Ms. Velandia) Why were you talking about</b></p> <p>16 <b>Chapter 23?</b></p> <p>17 A Because we wanted to come into Tulsa and be</p> <p>18 providing services to compete with CREOKS, who was also</p> <p>19 Chapter 23 private provider in Tulsa.</p> <p>20 <b>Q And when did Grand start providing services as</b></p> <p>21 <b>a private provider in Tulsa?</b></p> <p>22 A I don't recall.</p> <p>23 <b>Q Was it before you were CEO?</b></p> <p>24 A It was after I was CEO.</p> <p>25 <b>Q So it was after 2019?</b></p>	<p>Page 99</p> <p>1 A I believe is the right date. I'm 1,000 percent</p> <p>2 sure.</p> <p>3 <b>Q Was Grand certified as a CM -- a CBHC when it</b></p> <p>4 <b>was providing services under Chapter 23 in Tulsa?</b></p> <p>5 A I don't believe so, but I'm not -- I'm not</p> <p>6 100 percent sure.</p> <p>7 <b>Q When did Grand become certified as a CBHC?</b></p> <p>8 A 2017, I believe, like I said earlier, but I'm</p> <p>9 not 100 percent sure about that date.</p> <p>10 <b>Q So in addition to providing services in the</b></p> <p>11 <b>schools, what other services did Grand provide as a</b></p> <p>12 <b>private provider in Tulsa County before 2023?</b></p> <p>13 A Therapy, case management, care management,</p> <p>14 behavioral health coach in schools, therapists in</p> <p>15 schools.</p> <p>16 <b>Q Was that all to the schools? Was that all</b></p> <p>17 <b>provided in the schools, or was it provided in another</b></p> <p>18 <b>location?</b></p> <p>19 A In schools mostly.</p> <p>20 <b>Q If it wasn't in the schools, where was it</b></p> <p>21 <b>provided?</b></p> <p>22 A In the office.</p> <p>23 <b>Q What office?</b></p> <p>24 A Are you talking about Tulsa?</p> <p>25 <b>Q Yes, when you were providing Tulsa -- when you</b></p>
<p>Page 98</p> <p>1 A Sorry?</p> <p>2 <b>Q It was after 2019 then?</b></p> <p>3 A Yes.</p> <p>4 <b>Q And what kind of services did Grand provide as</b></p> <p>5 <b>a private provider when it first started providing</b></p> <p>6 <b>services in Tulsa County?</b></p> <p>7 A We were already providing services in Tulsa</p> <p>8 County because we had merged with the drug and alcohol</p> <p>9 center in Tulsa, and so we were already providing</p> <p>10 services underneath the -- whatever chapter that is of</p> <p>11 drug and alcohol. I think it's 24. Not sure. I mean,</p> <p>12 I don't want you to come back and say, you said</p> <p>13 something that -- so -- and we -- and we wanted to go</p> <p>14 into the schools in Tulsa, and we could do that as a</p> <p>15 private provider with Medicaid. So any clients that we</p> <p>16 saw that were indigent was just a write-off, but we were</p> <p>17 not under the criteria of a C -- CMHC or a CCBHC.</p> <p>18 <b>Q Was Grand certified as a CMHC at that time?</b></p> <p>19 A In Tulsa?</p> <p>20 <b>Q In general.</b></p> <p>21 A Yeah, we were -- we were certified as a CMHC</p> <p>22 for 45 years.</p> <p>23 <b>Q And was Grand certified as a CBHC at that time?</b></p> <p>24 A In 2017?</p> <p>25 <b>Q Yes.</b></p>	<p>Page 100</p> <p>1 <b>were -- when Grand was --</b></p> <p>2 A We were certified in Tulsa to provide</p> <p>3 outpatient services under -- not -- not the Department</p> <p>4 of Mental Health, but Medicaid, we were certified to</p> <p>5 provide under Chapter 23, which is a private provider,</p> <p>6 has nothing to do with the Department of Mental Health,</p> <p>7 I don't believe. It may have, but I don't think so.</p> <p>8 <b>Q So what office were the services provided out</b></p> <p>9 <b>of in Tulsa County?</b></p> <p>10 A It's called Skyline II on Skelly Drive. It was</p> <p>11 certified as also where the crisis center is. The only</p> <p>12 building in that area that's not certified was our</p> <p>13 eight-story building, and we provided no services out of</p> <p>14 that building.</p> <p>15 <b>Q So services -- so before November of 2023,</b></p> <p>16 <b>clients would come into the Skyline building to receive</b></p> <p>17 <b>mental health services?</b></p> <p>18 A No, we provided services in the schools.</p> <p>19 <b>Q But you said -- you said earlier most of the</b></p> <p>20 <b>services were provided in the schools. Were there</b></p> <p>21 <b>services that were not provided in the schools?</b></p> <p>22 A They would be provided in the Skyline II</p> <p>23 building.</p> <p>24 <b>Q And in addition to crisis care services, what</b></p> <p>25 <b>other services were provided in that building?</b></p>

<p>1 A Therapy, case management, outreach. Page 101</p> <p>2 <b>Q And when did the crisis center open in the</b></p> <p>3 <b>Skyline II building?</b></p> <p>4 A I believe it was December the 30th.</p> <p>5 <b>Q What year?</b></p> <p>6 A Be '23.</p> <p>7 <b>Q Okay.</b></p> <p>8 A That was -- that was opened underneath the drug</p> <p>9 and alcohol contract.</p> <p>10 <b>Q So you weren't providing crisis center services</b></p> <p>11 <b>before November of 2023 in Tulsa County?</b></p> <p>12 A For them?</p> <p>13 <b>Q Yes.</b></p> <p>14 A No, we didn't provide crisis services until</p> <p>15 December -- late December, maybe even early January, but</p> <p>16 I -- 2023, 2024. And we provided crisis services for</p> <p>17 dual diagnose. We also knew from our research -- and</p> <p>18 you're going to ask me what kind of research, and I'm</p> <p>19 just, you know -- so we -- we, from our research and</p> <p>20 from our belief that drug and alcohol treatment is this</p> <p>21 short of time when you're -- when you're ready to go</p> <p>22 into recovery, and so we opened that crisis center up so</p> <p>23 we could take people 24/7 and provide services when and</p> <p>24 where they needed it.</p> <p>25 <b>Q Was that a rehabilitation crisis center?</b></p>	<p>1 A No. Page 103</p> <p>2 <b>Q Going back, you said that Grand merged with the</b></p> <p>3 <b>drug and alcohol --</b></p> <p>4 A Yeah --</p> <p>5 <b>Q -- services?</b></p> <p>6 A -- used to be 12&amp;12.</p> <p>7 <b>Q When did that happen?</b></p> <p>8 A June, '22, I believe. I'm not 100 percent sure</p> <p>9 on that.</p> <p>10 <b>Q Okay. Walk me through how that came up. How</b></p> <p>11 <b>did it come to be that Grand merged with 12&amp;12?</b></p> <p>12 A 12&amp;12 was struggling financially. I believe</p> <p>13 that the chairman of the board went to Red Rock. I'm</p> <p>14 not sure if he went to Family &amp; Children Services or</p> <p>15 not. But -- but then he came to Grand and was looking</p> <p>16 for someone to be able to keep it open.</p> <p>17 <b>Q And did he say why he was having problems? Did</b></p> <p>18 <b>he say why 12&amp;12 was struggling financially?</b></p> <p>19 A Because they didn't have enough money.</p> <p>20 <b>Q But why?</b></p> <p>21 A The rates were one issue, medical detox was</p> <p>22 another issue, plus they were not staying full.</p> <p>23 <b>Q Were there any other reasons they were</b></p> <p>24 <b>struggling financially?</b></p> <p>25 A Do what?</p>
<p>1 <b>Was -- was that a URC?</b> Page 102</p> <p>2 A It was a URC and a crisis center and also a</p> <p>3 sobering center in Tulsa.</p> <p>4 <b>Q Before November, 2023, just to clarify, I think</b></p> <p>5 <b>you said -- I think you said that Grand was providing</b></p> <p>6 <b>therapy case management and outreach out of the Skyline</b></p> <p>7 <b>II center before November, 2023?</b></p> <p>8 A Yes, it was certified.</p> <p>9 <b>Q Certified as what?</b></p> <p>10 A Outpatient clinic.</p> <p>11 <b>Q Was that certification with the Department of</b></p> <p>12 <b>Mental Health or OHCA?</b></p> <p>13 A I'm not exactly sure, but I'm pretty sure it</p> <p>14 was with the Department of Mental Health.</p> <p>15 <b>Q And the patients actually came in and received</b></p> <p>16 <b>services?</b></p> <p>17 A I'm sorry?</p> <p>18 <b>Q And patients actually came in and received</b></p> <p>19 <b>those services in the Skyline facility?</b></p> <p>20 A Yeah, as long as you're certified.</p> <p>21 <b>Q And did you have a contract to provide those</b></p> <p>22 <b>services with the Oklahoma Health Care Authority?</b></p> <p>23 A That's correct.</p> <p>24 <b>Q Did you have any contract related to those</b></p> <p>25 <b>services with the Department of Mental Health?</b></p>	<p>1 <b>Q Were there any other reasons that 12&amp;12 was</b> Page 104</p> <p>2 <b>struggling financially?</b></p> <p>3 A No.</p> <p>4 <b>Q So then what happened? Did Grand conduct due</b></p> <p>5 <b>diligence regarding 12&amp;12?</b></p> <p>6 A Sorry?</p> <p>7 <b>Q Did Grand conduct due diligence regarding</b></p> <p>8 <b>acquiring 12&amp;12?</b></p> <p>9 A Yeah, the chairman of the board asked us to</p> <p>10 come in as -- and help operate 12&amp;12. His name is Joe</p> <p>11 Griffin. And we had a meeting with him and Bryan Day,</p> <p>12 which was the CEO of -- or the director or some title,</p> <p>13 I'm not sure what that is, but -- and he asked us to</p> <p>14 come in in October, and we had a contract with him to</p> <p>15 help manage 12&amp;12. They had 57 clients open. Pandemic</p> <p>16 was at its worst.</p> <p>17 <b>Q What else did you discuss with Bryan Day and</b></p> <p>18 <b>Joe Griffin?</b></p> <p>19 A Sorry?</p> <p>20 <b>Q What else did you discuss with Bryan Day and</b></p> <p>21 <b>Joe Griffin when you were meeting to discuss possibly</b></p> <p>22 <b>managing 12&amp;12?</b></p> <p>23 A Bryan was there and we talked about their</p> <p>24 financials, and -- and they just were not making it.</p> <p>25 They borrowed \$3 million, I think.</p>

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1 **Q And was that a problem?**

2 A Was that a problem?

3 **Q (Attorney moves head up and down.)**

4 A No.

5 **Q Were they able to pay their debt?**

6 A Barely.

7 **Q Did anybody else talk to you or anyone else at**

8 **Grand about acquiring 12&12 before it was acquired?**

9 A Before what?

10 **Q Before it was acquired.**

11 A I'm pretty sure we had a conversation with the

12 Department of Mental Health, because we didn't want to

13 just go in there and merge. And I'm pretty sure we kind

14 of got permission from the Department of Mental Health

15 to do that, because the funding from the department.

16 **Q What funding?**

17 A There was about \$9 million that the Department

18 of Mental Health was funding 12&12 with. They were

19 paying for full or empty beds at the time that we came

20 in. And I don't know how many beds that was. And we

21 came in from October to June. We pretty well had a

22 pretty good turn over -- or, I mean, had a pretty good

23 moving in the right direction by the time June hit.

24 However, Joe Griffin and the board asked us to merge.

25 **Q Why did they tell you they wanted to merge?**

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1 A Probably the same reason they had us come in

2 and manage it. They didn't have good management. Or

3 the management -- Bryan Day was their CEO. And he's a

4 smart man, but he didn't -- he didn't get it.

5 **Q So was that around June, 2023?**

6 A I believe so. Maybe 2022. I don't know. I

7 think we've been in there -- it had to be 2022, I

8 believe, but I'm not sure.

9 **Q So did you run -- did you run numbers to see**

10 **whether Grand could financially keep 12&12 afloat? Did**

11 **you run any numbers or do any due diligence to confirm**

12 **whether Grand could keep 12&12 afloat before you merged?**

13 A We basically knew -- we basically knew that

14 they had to be full and they had to be -- be billing to

15 Medicaid or -- when it was -- when a client had

16 Medicaid, and to the Department of Mental Health

17 contract when the -- when the person was a -- a DMH

18 client.

19 **Q And how did Grand plan to make sure that 12&12**

20 **was full?**

21 A How did Grand do what?

22 **Q Plan to make sure that 12&12 was full.**

23 A Outreach 24/7. Tulsa was used to outreach

24 being 8 to 5, Monday through Friday, and that's not when

25 people necessarily need services.

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1 **Q How did Grand engage in outreach 24/7? What**

2 **specifically did Grand do?**

3 A We hired staff 24/7, enough to be at least two

4 vans out, I believe, is the right number. Josh would be

5 able to answer this question a lot better than me,

6 because he's in charge of operations.

7 **Q So you just hired staff to be at the -- at**

8 **12&12? Or did they do community outreach?**

9 A No, they were outreach staff.

10 **Q Did they go out into the community?**

11 A Yes, mostly the homeless community.

12 **Q So was it like with the Medicaid, when you**

13 **first became CFO, they would go out to the homeless**

14 **community and approach people to see if they needed drug**

15 **and alcohol treatment?**

16 A Most homeless people either have a mental

17 health issue or drug and alcohol. Not all, but most.

18 **Q So -- so that would be a yes?**

19 A What's the question?

20 MS. VELANDIA: Can you read back my question,

21 please?

22 (Reporter read back requested portion.)

23 THE WITNESS: CEO or CFO?

24 THE REPORTER: CFO.

25 THE WITNESS: No.

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1 **Q (By Ms. Velandia) How was it different?**

2 A We were not in Tulsa when we were -- when I was

3 a CFO.

4 **Q Did the staff of 12&12, when Grand was**

5 **operating it, go out to where homeless people were to**

6 **see whether those people needed services from 12&12?**

7 A Yes.

8 **Q And then how did -- sorry. Did -- did Grand**

9 **give them then a card or a flier or did it transport**

10 **them to 12&12?**

11 A If somebody was ready for recovery, we would

12 actually transport them over to 12&12. That is before

13 we opened up the crisis center.

14 **Q Did 12&12 have a URC --**

15 A No.

16 **Q -- at the time that it was acquired?**

17 A I'm sorry. No.

18 **Q What does URC stand for?**

19 A Urgent recovery center.

20 **Q Does Grand have a URC now?**

21 A In Tulsa?

22 **Q Yes.**

23 A Yes.

24 **Q Is -- is the URC what you were referring to**

25 **earlier as the crisis center?**

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1 A No, there's two different programs within  
 2 there. Crisis center must have beds. URC can have  
 3 people be in chairs for 23 hours and 59 minutes, and  
 4 then after that, they have to volunteer to stay there,  
 5 if -- if we brought them in under an EDO process. Oh,  
 6 God, here you go, what is EDO? Yeah.  
 7 **Q What is EDO?**  
 8 A Emergency detention where a police officer  
 9 would take somebody into custody under 43A.  
 10 **Q Did Grand work with the police department to --**  
 11 **to assist with patients needing alcohol and drug**  
 12 **treatment coming to 12&12?**  
 13 A Yes.  
 14 **Q How -- how did they do that exactly? Walk me**  
 15 **through what they did.**  
 16 A From the crisis unit or from --  
 17 **Q 12&12.**  
 18 A 12&12. Before the crisis center was there?  
 19 **Q Yes.**  
 20 A No, everybody had to be a volunteer.  
 21 **Q And then when --**  
 22 A So I don't think police officers brought people  
 23 in.  
 24 **Q So that was only when the URC opened?**  
 25 A Yes.

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1 **Q When Grand merged with 12&12, was it losing**  
 2 **money?**  
 3 MR. RATCLIFF: Objection.  
 4 THE WITNESS: 12&12? I already answered that  
 5 question.  
 6 MR. RATCLIFF: Object to the form.  
 7 **Q (By Ms. Velandia) When it merged with 12&12,**  
 8 **was it losing money? Was 12&12 losing money?**  
 9 A I think I already answered that question, but  
 10 yes.  
 11 **Q And then a year -- well, let's see, did it**  
 12 **start -- was it still losing money the whole time that**  
 13 **Grand was running it?**  
 14 A When we had a contract to run it, you mean?  
 15 **Q No, when you -- after you merged with it.**  
 16 A Oh, after we merged? It reduced the loss by a  
 17 tremendous amount, because we paid off the building,  
 18 their debt, and put about \$5 million into 12&12.  
 19 **Q Was 12&12 still losing money after that --**  
 20 **after all that?**  
 21 A No, I don't think so.  
 22 **Q When did 12&12 stop losing money?**  
 23 A I believe when we -- they were no longer paying  
 24 interest on their building, because we -- and that's a  
 25 big chunk of money when you're looking at \$3.2 million.

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1 I think it was 3.2.  
 2 **Q So when was that?**  
 3 A June, 2022, or -- I believe.  
 4 **Q But if you account for that 3.2 million that**  
 5 **Grand invested in 12&12, it -- it would have been a**  
 6 **loss; right? Did Grand ever recover that 3.2 million?**  
 7 A No, one of the things that we were able to do  
 8 is get a higher rate for medical detox and for  
 9 residential treatment.  
 10 **Q And were you able to recover that 3.2 million**  
 11 **by doing that?**  
 12 A Sorry?  
 13 **Q Was Grand able to recover the 3.2 million by**  
 14 **doing that?**  
 15 A No.  
 16 **Q Did Grand ever recover that 3.2 million through**  
 17 **12&12?**  
 18 A No, it was an investment. I mean, at some  
 19 point you would think so.  
 20 **Q But not -- not during the time that you were**  
 21 **CEO?**  
 22 A No.  
 23 **Q Was there anything else Grand was trying to do**  
 24 **to ensure that it continued to operate 12&12?**  
 25 A Say it again?

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1 **Q Was there anything else that Grand was doing to**  
 2 **try to stop losing money on 12&12 and to cover that 3.2**  
 3 **million?**  
 4 A We did some improvements. We put a generator  
 5 there, because when the electricity went out, they would  
 6 have to empty their building, because without  
 7 electricity. And we put a new elevator in.  
 8 **Q So did Grand do financial projections or**  
 9 **anything to show that it was going to recover that 3.2**  
 10 **million eventually if 12&12 was full?**  
 11 A I don't think that was our concern.  
 12 **Q What was the concern?**  
 13 A We used 12&12 out of our 12 counties for people  
 14 that had drug and alcohol problems that needed medical  
 15 detox and that needed residential. And it was kind of  
 16 selfish, but we couldn't afford them to shut down,  
 17 because we wouldn't have anyplace to send our clients  
 18 from -- from our 12 counties to get drug and alcohol  
 19 treatment. So it was an investment to make sure that we  
 20 had a place.  
 21 **Q So it was a decision to operate at a loss to**  
 22 **ensure that there was a -- a facility like 12&12 open?**  
 23 A Sorry?  
 24 **Q So was there a decision to operate at a loss in**  
 25 **order to ensure that 12&12 remained open?**

<p>Page 113</p> <p>1 A It's not a loss now.</p> <p>2 <b>Q Oh, it's making money now?</b></p> <p>3 A Yes.</p> <p>4 <b>Q But has it recovered that 3.2 million?</b></p> <p>5 A No.</p> <p>6 <b>Q How much do you think it's recovered towards</b></p> <p>7 <b>that?</b></p> <p>8 A 125,000 a month maybe.</p> <p>9 <b>Q And when did it start being profitable?</b></p> <p>10 A I'm going to say six months after we merged.</p> <p>11 Remember, the pandemic was going on. We made a</p> <p>12 decision -- do you want to hear all this?</p> <p>13 <b>Q Sure.</b></p> <p>14 A I probably should just answer your question,</p> <p>15 because you are going to come back and tell me</p> <p>16 something. We made a decision when the pandemic was</p> <p>17 going on that people would be safer that had a drug and</p> <p>18 alcohol problem on that unit than they would be by</p> <p>19 closing it down and not having any clients there. So we</p> <p>20 requested all clients take the shot to -- whatever that</p> <p>21 shot was called. And those people that wouldn't take</p> <p>22 the shot, then we found them other services other</p> <p>23 places. So -- and the reason we required the shot is</p> <p>24 because it -- the theory was if you got the shot, you</p> <p>25 wouldn't get as sick, even if you got COVID. And so we</p>	<p>Page 115</p> <p>1 A I don't know exactly what month it was.</p> <p>2 <b>Q Who?</b></p> <p>3 A Zarrow Foundation, Kaiser Foundation.</p> <p>4 <b>Q And what was discussed?</b></p> <p>5 A What?</p> <p>6 <b>Q What was discussed during those conversations?</b></p> <p>7 A To rebuild the facility and to make it a</p> <p>8 one-stop shop there on the corner of Skyline and --</p> <p>9 where you could -- I'm sorry, Skelly Drive -- where</p> <p>10 people that came in, we would have a nice -- a nice</p> <p>11 facility so we could keep them there, rebuild the</p> <p>12 kitchen, rebuild a lot of the projects. About a \$45</p> <p>13 million project.</p> <p>14 <b>Q And did that happen, that \$45 million project?</b></p> <p>15 A No.</p> <p>16 <b>Q Why --</b></p> <p>17 A It's still in the works, I'm sorry.</p> <p>18 <b>Q Why were you discussing that with the</b></p> <p>19 <b>foundations?</b></p> <p>20 A Because they give money for capital campaigns.</p> <p>21 <b>Q And did they give Grand money for that capital</b></p> <p>22 <b>campaign in relation to 12&amp;12?</b></p> <p>23 A When what?</p> <p>24 <b>Q Did the foundations give money to Grand as part</b></p> <p>25 <b>of a capital campaign to assist with 12&amp;12?</b></p>
<p>Page 114</p> <p>1 did that.</p> <p>2 <b>Q So by staying open during COVID, was that one</b></p> <p>3 <b>of the ways that 12&amp;12 became profitable?</b></p> <p>4 A I think it led to that, yes.</p> <p>5 <b>Q Did Grand obtain any grants to assist it with</b></p> <p>6 <b>talking over 12&amp;12 and operating it?</b></p> <p>7 A I don't believe so, but I'm not -- I'm not</p> <p>8 sure.</p> <p>9 <b>Q Before November, 2023, did Grand receive any</b></p> <p>10 <b>grants to help it expand services in Tulsa?</b></p> <p>11 A No, not that I'm aware of.</p> <p>12 <b>Q Who would know about those?</b></p> <p>13 A Josh Cantwell, chief operating officer.</p> <p>14 <b>Q Did Grand have any communications with any</b></p> <p>15 <b>foundations related to the possibility of it acquiring</b></p> <p>16 <b>12&amp;12?</b></p> <p>17 A Sorry?</p> <p>18 <b>Q Did Grand have any communications with any of</b></p> <p>19 <b>the foundations in Tulsa related to the possibility of</b></p> <p>20 <b>it acquiring 12&amp;12?</b></p> <p>21 A Of the foundation requiring -- acquiring it?</p> <p>22 <b>Q Did Grand have any communications about 12&amp;12</b></p> <p>23 <b>with the foundations in Tulsa?</b></p> <p>24 A Yes.</p> <p>25 <b>Q When?</b></p>	<p>Page 116</p> <p>1 A Yes.</p> <p>2 <b>Q How much?</b></p> <p>3 A The Kaiser Foundation gave five million. I'm</p> <p>4 sorry, the Zarrow pledged five million. The Zarrow's, I</p> <p>5 think, gave -- I mean, the Kaiser -- I'm not sure what</p> <p>6 they gave. The person that's in charge of all that is</p> <p>7 Selena Stockley.</p> <p>8 <b>Q That's a -- that's a Grand employee?</b></p> <p>9 A Yes.</p> <p>10 <b>Q Did -- was anything else discussed with Zarrow</b></p> <p>11 <b>and Kaiser Foundation related to 12&amp;12, besides capital</b></p> <p>12 <b>campaigns?</b></p> <p>13 A I don't believe so.</p> <p>14 <b>Q Who met with them?</b></p> <p>15 A That would have been Selena Stockley.</p> <p>16 <b>Q What's her title?</b></p> <p>17 A She is -- I'm not sure what her title is.</p> <p>18 She's in charge of that fund drive.</p> <p>19 <b>Q So you weren't at those meetings?</b></p> <p>20 A Sorry?</p> <p>21 <b>Q You weren't involved in any of those</b></p> <p>22 <b>conversations personally?</b></p> <p>23 A Not that I remember.</p> <p>24 <b>Q Earlier you talked about getting a better rate</b></p> <p>25 <b>for medical detox and residential treatment at 12&amp;12?</b></p>

<p style="text-align: right;">Page 117</p> <p>1 A Uh-huh.</p> <p>2 <b>Q How were you able to do that?</b></p> <p>3 A Through the Department of Mental Health. I</p> <p>4 think we had -- I don't recall exactly what the rate</p> <p>5 was, but it wasn't adequate to run 12&amp;12. And then we</p> <p>6 also got that same rate for Medicaid through Oklahoma</p> <p>7 Health -- through the Oklahoma Health Care Authority,</p> <p>8 and they added a 30 percent increase on that because</p> <p>9 certain clients -- with the MCOs coming in and some of</p> <p>10 this other stuff that happened, I -- anyway, they --</p> <p>11 they added -- Josh Cantwell could answer that question.</p> <p>12 <b>Q Who did you talk to at DMH about increasing the</b></p> <p>13 <b>rates?</b></p> <p>14 A I believe -- I believe that would be Wendy.</p> <p>15 <b>Q Wendy Larsen-Bond?</b></p> <p>16 A Yes.</p> <p>17 <b>Q And did Grand provide her any information to</b></p> <p>18 <b>support that request?</b></p> <p>19 A Yes.</p> <p>20 <b>Q What information would that have been?</b></p> <p>21 A The rates of the states around us were higher</p> <p>22 than what Oklahoma was paying.</p> <p>23 <b>Q Anything else?</b></p> <p>24 A I don't believe so. That was -- that was the</p> <p>25 main...</p>	<p style="text-align: right;">Page 119</p> <p>1 A You know, when I think about it, I believe so.</p> <p>2 <b>Q And who was that?</b></p> <p>3 A That would be Carrie Slatton-Hodges and</p> <p>4 Courtney Blaylock. They got me on the phone and said,</p> <p>5 are you interested in going into Tulsa County, which</p> <p>6 would be kind of like what we did with Teri Klein;</p> <p>7 right? And I went to the board and asked them. And</p> <p>8 they said, man, if that's what you want to do, we'll --</p> <p>9 we'll do it, but, you know, we've already been there</p> <p>10 once. And so we -- and then Carrie called back right</p> <p>11 after that. I believe she called me. Courtney called</p> <p>12 me. Somebody called me. And said, we just found out we</p> <p>13 have to do an RFP, you can't just come in here. That</p> <p>14 was kind of the conversation, the basis of the</p> <p>15 conversation.</p> <p>16 And I can't tell you when that was, but it</p> <p>17 happened. Obviously it was before the RFP came out,</p> <p>18 because at that point, she didn't believe she had to do</p> <p>19 an RFP. She believed that she could bring us into Tulsa</p> <p>20 the same way that was done before. But then informed me</p> <p>21 that I had to do an RFP. She did not say she was going</p> <p>22 to put out an RFP. She said it would have to go out as</p> <p>23 an RFP, based upon legal. I think that would be Don --</p> <p>24 is it Don or Dan -- I want to say Crosby, but that's not</p> <p>25 right. And he is the main attorney at the Department of</p>
<p style="text-align: right;">Page 118</p> <p>1 <b>Q When did Grand first learn of a potential RFP</b></p> <p>2 <b>for CCBHC services in Tulsa?</b></p> <p>3 A You know, I -- I've thought about that several</p> <p>4 times, and I just -- I'm going to say rumors in Tulsa</p> <p>5 County. I believe that what was happening was that Gail</p> <p>6 Lapidus was trying to stop the RFP and was calling on</p> <p>7 legislators and the district attorney and other people</p> <p>8 trying to keep the RFP from coming out. And I think</p> <p>9 those conversations she was having was earlier than -- I</p> <p>10 believe that's when we learned about it, and I can't</p> <p>11 even tell you when that was.</p> <p>12 <b>Q So you -- do you think that was before 2021?</b></p> <p>13 A I don't recall.</p> <p>14 <b>Q Do you --</b></p> <p>15 A I don't recall when it was. I just know that's</p> <p>16 what was happening.</p> <p>17 <b>Q How do you know that that was going on?</b></p> <p>18 A I can't name anybody specifically, but it was a</p> <p>19 lot of chatter.</p> <p>20 <b>Q Did you learn that from anybody at the</b></p> <p>21 <b>Department of Mental Health?</b></p> <p>22 A No.</p> <p>23 <b>Q Did you ever talk to anyone about the</b></p> <p>24 <b>Department of Mental Health about the potential for an</b></p> <p>25 <b>RFP being issued in Tulsa County?</b></p>	<p style="text-align: right;">Page 120</p> <p>1 Mental Health.</p> <p>2 <b>Q Was it Ryan Berry?</b></p> <p>3 A No, it's not him.</p> <p>4 <b>Q Was it Durand Crosby?</b></p> <p>5 A The -- I'm not sure the first name is even</p> <p>6 right. It may be Rand -- anyway, somebody at the</p> <p>7 Department of Mental Health, I believe, and I don't know</p> <p>8 that for a fact, but I do know this, it was a legal</p> <p>9 decision that it had to go out as an RFP.</p> <p>10 <b>Q Who -- how did you know that?</b></p> <p>11 A Huh?</p> <p>12 <b>Q How do you know that?</b></p> <p>13 A The conversation I had with Courtney and --</p> <p>14 now, she didn't say she was going to put it out as an</p> <p>15 RFP. She just said it has to go out as an RFP. And</p> <p>16 that was the end of that conversation.</p> <p>17 <b>Q And you never had any other conversations with</b></p> <p>18 <b>her about a potential RFP in Tulsa County?</b></p> <p>19 A No.</p> <p>20 <b>Q You never asked her if one was going to come</b></p> <p>21 <b>out?</b></p> <p>22 A Yeah, I did ask her that. I mean, you know, we</p> <p>23 were talking about maybe a year and a half before that,</p> <p>24 and I asked her, is -- is an RFP coming out for Tulsa</p> <p>25 County, and she didn't answer. She was like that. If I</p>

<p>Page 121</p> <p>1 would e-mail her something or talk to her and she didn't</p> <p>2 want to answer the question, she just wouldn't answer</p> <p>3 the question.</p> <p>4 <b>Q Was that Courtney or Carrie that you said you</b></p> <p>5 <b>contacted about whether an RFP was going to come out?</b></p> <p>6 A Do what?</p> <p>7 <b>Q Was that Courtney or Carrie that you were</b></p> <p>8 <b>talking to about whether or not --</b></p> <p>9 A It was both of them at the same time on the</p> <p>10 phone when we talked about Grand coming into Tulsa</p> <p>11 County. The -- Carrie somehow communicated with me, and</p> <p>12 I don't know if it was a phone call or what, but she</p> <p>13 basically said this would have to go out as an RFP. She</p> <p>14 didn't say she was going to put it out. She just said</p> <p>15 it would have to go out.</p> <p>16 <b>Q Did she explain why it had to go out as an RFP,</b></p> <p>17 <b>other than to say it was a legal --</b></p> <p>18 A It had something to do with legal.</p> <p>19 <b>Q Did -- did she say anything about --</b></p> <p>20 A OMES -- that OMES, all that stuff. But, again,</p> <p>21 I don't know.</p> <p>22 <b>Q Did she say anything about sole-source</b></p> <p>23 <b>contract?</b></p> <p>24 A Do what?</p> <p>25 <b>Q Did she ever use the term sole-source contract?</b></p>	<p>Page 123</p> <p>1 <b>CCBHC and they would not respond.</b></p> <p>2 A And it was never responded to that I can</p> <p>3 remember.</p> <p>4 <b>Q But who were you e-mailing?</b></p> <p>5 A Probably Carrie.</p> <p>6 <b>Q Okay. Could it have been anybody else?</b></p> <p>7 A I don't think so. It could have. I'm pretty</p> <p>8 serious about that stuff.</p> <p>9 <b>Q What does that mean?</b></p> <p>10 A I'm just serious about our business, period.</p> <p>11 And part -- part of that business appeared to be going</p> <p>12 into Tulsa at that point, and so -- and I -- when they</p> <p>13 asked me to come in, I went to the board, asked them,</p> <p>14 but before all that happened, I got a message from</p> <p>15 Carrie, either through the bird flying over my head or</p> <p>16 something, that there was a message from Carrie that</p> <p>17 said we have to go out for an RFP.</p> <p>18 <b>Q And then earlier I asked if you had talked to</b></p> <p>19 <b>her about the RFP after that to ask her if one was</b></p> <p>20 <b>coming out. Did you ever e-mail her about the RFP after</b></p> <p>21 <b>she told you that it had to go out for RFP?</b></p> <p>22 A Very possible. Not impossible.</p> <p>23 <b>Q You said earlier that you did e-mail somebody.</b></p> <p>24 <b>Are you changing that testimony now?</b></p> <p>25 A Yeah, because I just don't really recall that</p>
<p>Page 122</p> <p>1 A We have some sole-source funding, but I didn't</p> <p>2 have that conversation with Carrie.</p> <p>3 <b>Q Did she say anything about fixed-rate contracts</b></p> <p>4 <b>when she was telling you that it would have to go out as</b></p> <p>5 <b>an RFP?</b></p> <p>6 A Best of my recollection, she just said, this</p> <p>7 has to go out as an RFP, I can't -- you can't just come</p> <p>8 into Tulsa County. Something like that. I don't</p> <p>9 remember the exact words. Don't know the date, don't</p> <p>10 know the time.</p> <p>11 <b>Q So you mentioned, though, that you would e-mail</b></p> <p>12 <b>somebody about the RFP and she would not respond. Was</b></p> <p>13 <b>that Carrie or Courtney?</b></p> <p>14 A I never had that -- any conversations with</p> <p>15 Courtney after that phone call.</p> <p>16 <b>Q So that would have been Carrie?</b></p> <p>17 A What?</p> <p>18 <b>Q That would have been Carrie that you had</b></p> <p>19 <b>e-mailed?</b></p> <p>20 A I don't recall. I might've have.</p> <p>21 <b>Q Who else would it have been if it wasn't</b></p> <p>22 <b>Carrie?</b></p> <p>23 A E-mailed about what?</p> <p>24 <b>Q You said earlier that you would e-mail somebody</b></p> <p>25 <b>about whether an RFP was coming out for Tulsa County</b></p>	<p>Page 124</p> <p>1 well so...</p> <p>2 <b>Q So you don't recall if you spoke to anyone at</b></p> <p>3 <b>DMH about the potential for an RFP for CCBHC services</b></p> <p>4 <b>after Carrie told you there had to be an RFP?</b></p> <p>5 A That's correct. That was probably 18 months</p> <p>6 before it came out.</p> <p>7 <b>Q So what did you tell your board after you</b></p> <p>8 <b>learned there had to be an RFP?</b></p> <p>9 A I just told them there had to be an RFP. We --</p> <p>10 we were not going to just come into Tulsa and -- like we</p> <p>11 did in 2000.</p> <p>12 <b>Q Did Grand do anything to prepare for a</b></p> <p>13 <b>potential RFP?</b></p> <p>14 A Do what?</p> <p>15 <b>Q Did Grand do anything to prepare for a possible</b></p> <p>16 <b>RFP?</b></p> <p>17 A Yes.</p> <p>18 <b>Q What did -- what did Grand do?</b></p> <p>19 A We became a Chapter 23 individual -- which is a</p> <p>20 private provider, same as CREOKS, and we did the same</p> <p>21 thing when we did the five counties back in 2017, so it</p> <p>22 was no different than what we did in Edwin Fair area</p> <p>23 than what we did in Tulsa. There's no difference</p> <p>24 between those.</p> <p>25 <b>Q And what -- what specifically was that that was</b></p>

<p>1 <b>done?</b> <span style="float: right;">Page 125</span></p> <p>2 A What?</p> <p>3 <b>Q What specifically was it that was done?</b></p> <p>4 A We started providing services under Chapter 23,</p> <p>5 which is an individual -- which allows private providers</p> <p>6 to come in and provide services.</p> <p>7 <b>Q And that's the only thing that Grand did to</b></p> <p>8 <b>prepare for an RFP?</b></p> <p>9 A I believe so, but I'm not 100 percent sure.</p> <p>10 <b>Q Did --</b></p> <p>11 A I've got 11 executive team members.</p> <p>12 <b>Q Did it purchase or lease any facilities?</b></p> <p>13 A Do what?</p> <p>14 <b>Q Did it purchase or lease any facilities?</b></p> <p>15 A Before?</p> <p>16 <b>Q To prepare for a potential RFP?</b></p> <p>17 A We prepared to be able to be a private provider</p> <p>18 in Tulsa, and we did purchase Skyline I and Skyline II,</p> <p>19 but not preparing for an RFP. Preparing to be a private</p> <p>20 provider in Tulsa.</p> <p>21 <b>Q But you prepared to be a private provider in</b></p> <p>22 <b>Tulsa to prepare for a potential RFP, you said earlier?</b></p> <p>23 A Yeah, I would say that that's true, because</p> <p>24 that's what we did in the -- in the five counties that</p> <p>25 we did an RFP on in that Edwin Fair area --</p>	<p>1 <b>besides CMHC or CBHC?</b> <span style="float: right;">Page 127</span></p> <p>2 A I think that we were a CCBHC -- we became a</p> <p>3 CCBHC in 2017.</p> <p>4 <b>Q So just to clarify, the Edwin Fair RFP, it</b></p> <p>5 <b>sounds like you -- you're pretty certain it was either</b></p> <p>6 <b>CBHC or CMHC services?</b></p> <p>7 A Yeah, I'm not sure what the RFP said, because I</p> <p>8 don't do RFPs.</p> <p>9 <b>Q Did it --</b></p> <p>10 A That's Josh Cantwell's responsibility.</p> <p>11 <b>Q What did Grand do to prepare for the RFP in</b></p> <p>12 <b>those five counties?</b></p> <p>13 A We became a private provider. CREOKS was</p> <p>14 already in those five counties. Not in every one of</p> <p>15 them, but they were -- they had a -- a presence, and</p> <p>16 they -- and we -- we -- we wanted to make sure that we</p> <p>17 had a presence. But we did not know the RFP was coming</p> <p>18 out or when.</p> <p>19 <b>Q What else did Grand do to prepare for the RFP</b></p> <p>20 <b>in Tulsa?</b></p> <p>21 A We did nothing to prepare for the RFP, but we</p> <p>22 made some business decisions. Because you keep asking</p> <p>23 me what we did to prepare for an RFP. We made some</p> <p>24 business decisions of how we want to be -- how we wanted</p> <p>25 to operate.</p>
<p>1 <b>Q When was that --</b> <span style="float: right;">Page 126</span></p> <p>2 A -- that I talked about.</p> <p>3 <b>Q -- again?</b></p> <p>4 A Huh?</p> <p>5 <b>Q When was that that you did an RFP in Edwin</b></p> <p>6 <b>Fair?</b></p> <p>7 A I think it was 2017.</p> <p>8 <b>Q What was --</b></p> <p>9 A But I'm not 100 percent sure.</p> <p>10 <b>Q What were those counties?</b></p> <p>11 A Kay, Noble, Osage, Pawnee and Payne.</p> <p>12 <b>Q And was that an RFP for CMHC or CBHC services?</b></p> <p>13 A What was that?</p> <p>14 <b>Q Was that an RFP for CBHC services or CMHC</b></p> <p>15 <b>services?</b></p> <p>16 A I believe it was CCBHC, but I'm not 100 percent</p> <p>17 sure on that.</p> <p>18 <b>Q If it wasn't CCBHC, would it be CMHC?</b></p> <p>19 A If it wasn't what?</p> <p>20 <b>Q If it wasn't CCBHC, would it be CMHC?</b></p> <p>21 A No, I don't believe so. Well, it could have</p> <p>22 been, yeah. It's --</p> <p>23 <b>Q Is there any --</b></p> <p>24 A -- possible.</p> <p>25 <b>Q Is there anything else it could have been</b></p>	<p>1 <b>Q What were those business decisions?</b> <span style="float: right;">Page 128</span></p> <p>2 A Chapter 23, private provider, same as CREOKS.</p> <p>3 They had a pretty good model going.</p> <p>4 <b>Q Anything else? I just want to make sure I know</b></p> <p>5 <b>everything that Grand did to prepare for the RFP.</b></p> <p>6 A I didn't prepare for the RFP. I did a business</p> <p>7 decision of what we should do.</p> <p>8 <b>Q Because there was going to be --</b></p> <p>9 A Because we --</p> <p>10 <b>Q -- a potential for an RFP?</b></p> <p>11 A -- were already at 12&amp;12 --</p> <p>12 <b>Q Uh-huh.</b></p> <p>13 A -- we had a bunch of clients that we -- when</p> <p>14 we'd send them to Family &amp; Children's Services or</p> <p>15 somewhere else, they seemed to get lost, and so we</p> <p>16 wanted to be able to provide services to those clients</p> <p>17 that were -- after they had 28 days of treatment,</p> <p>18 because we always look for outcomes, not services.</p> <p>19 <b>Q So you were already -- Grand had already merged</b></p> <p>20 <b>with 12&amp;12 when it learned about the potential for an</b></p> <p>21 <b>RFP in Tulsa County?</b></p> <p>22 A Yes, best of my knowledge.</p> <p>23 <b>Q Did Grand hire anybody to help put it in a</b></p> <p>24 <b>better position to respond to an RFP for Tulsa County?</b></p> <p>25 A We didn't do anything to prepare for an RFP in</p>

<p style="text-align: right;">Page 129</p> <p>1 Tulsa County. We made a business decision, since we</p> <p>2 merged with 12&amp;12, we came in as a private provider,</p> <p>3 same as CREOKS would, and we served those clients that</p> <p>4 were graduating from our drug and alcohol program.</p> <p>5 That's not preparing to be -- for an RFP. That's not --</p> <p>6 that's not preparing for anything. It was providing</p> <p>7 services to people to get a better outcome.</p> <p>8 <b>Q But would you -- would you have made a presence</b></p> <p>9 <b>in Tulsa County if there weren't going to be the</b></p> <p>10 <b>potential for an RFP?</b></p> <p>11 A What?</p> <p>12 <b>Q Would Grand have done that if there weren't a</b></p> <p>13 <b>potential for an RFP?</b></p> <p>14 A I believe so, because we were -- we didn't do</p> <p>15 it for the RFP. I keep saying that to you, and you're</p> <p>16 going to keep saying I did it. But let's make it</p> <p>17 clear --</p> <p>18 <b>Q Well, you did say earlier that you did it.</b></p> <p>19 A -- it was a business decision to serve clients</p> <p>20 graduating from 12&amp;12 to have a better outcome because</p> <p>21 we were able to -- we would be able to treat them.</p> <p>22 <b>Q So you didn't engage any -- any other entities</b></p> <p>23 <b>that help with preparing a potential RFP?</b></p> <p>24 A Repeat it.</p> <p>25 <b>Q Did Grand engage any vendors to help it prepare</b></p>	<p style="text-align: right;">Page 131</p> <p>1 or no question. He didn't say yes or no.</p> <p>2 THE WITNESS: You said I answered it yes or no.</p> <p>3 What is the question that you want me --</p> <p>4 Is it okay to answer it?</p> <p>5 MR. RATCLIFF: If you understand it.</p> <p>6 THE WITNESS: Well, I mean, make sure I</p> <p>7 understand it.</p> <p>8 MS. VELANDIA: Can you read back my question,</p> <p>9 please?</p> <p>10 THE REPORTER: Which one? I mean, there were</p> <p>11 several --</p> <p>12 MS. VELANDIA: Did you engage any outside</p> <p>13 vendors.</p> <p>14 (Reporter read back requested portion.)</p> <p>15 THE WITNESS: And I told you that we didn't</p> <p>16 prepare for an RFP in Tulsa County.</p> <p>17 <b>Q (By Ms. Velandia) So the answer is no?</b></p> <p>18 A No. Could you describe --</p> <p>19 MR. DEMURO: Counsel, what about a lunch break?</p> <p>20 MS. VELANDIA: Yeah, we can do a lunch break if</p> <p>21 you guys want to.</p> <p>22 THE VIDEOGRAPHER: Off the record at 12:29 p.m.</p> <p>23 (Recess taken from 12:29 p.m. to 1:14 p.m.)</p> <p>24 THE VIDEOGRAPHER: Back on the record at</p> <p>25 1:14 p.m.</p>
<p style="text-align: right;">Page 130</p> <p>1 <b>for an RFP in Tulsa County?</b></p> <p>2 A We were not preparing for an RFP in Tulsa</p> <p>3 County. We were preparing to provide services in Tulsa</p> <p>4 County as a private provider, the same as CREOKS.</p> <p>5 <b>Q So your testimony --</b></p> <p>6 A I've said that ten times.</p> <p>7 <b>Q So your testimony about -- in response to my</b></p> <p>8 <b>question is no?</b></p> <p>9 A What?</p> <p>10 <b>Q Your testimony in response to my question is</b></p> <p>11 <b>no?</b></p> <p>12 MR. RATCLIFF: Objection. He's answered the</p> <p>13 question.</p> <p>14 MS. VELANDIA: He didn't say yes or no. It's a</p> <p>15 yes or no question.</p> <p>16 MR. RATCLIFF: I don't think it is. He</p> <p>17 answered the question. Move on.</p> <p>18 You don't have to answer.</p> <p>19 MS. VELANDIA: He can answer. I can keep</p> <p>20 asking.</p> <p>21 MR. RATCLIFF: I'm instructing you. You've</p> <p>22 answered the question.</p> <p>23 If there's a new question, he can answer it.</p> <p>24 But you --</p> <p>25 MS. VELANDIA: He didn't answer it. It's a yes</p>	<p style="text-align: right;">Page 132</p> <p>1 <b>Q (By Ms. Velandia) Kind of a change of topics.</b></p> <p>2 <b>Can you kind of explain to me your understanding of how</b></p> <p>3 <b>CCBHCs are paid for their services?</b></p> <p>4 A Yeah, a CCBHC is a lot like an FQHC. You get</p> <p>5 cost reimbursement. Now, in Oklahoma, we made a</p> <p>6 decision to go to PPS-1 -- or PPS-2, I'm sorry, which</p> <p>7 means that we get paid per member per month. We're</p> <p>8 expected to get outcomes for that, which -- which I</p> <p>9 like.</p> <p>10 <b>Q So if you don't meet certain outcome criteria,</b></p> <p>11 <b>does the CCBHC not get paid?</b></p> <p>12 A No, they get still paid, but it's expected to</p> <p>13 have some outcomes.</p> <p>14 <b>Q And then what is ETPS? Can you explain to me</b></p> <p>15 <b>what that is? Because I really don't understand it.</b></p> <p>16 A No, I really can't.</p> <p>17 <b>Q Is it based on outcomes?</b></p> <p>18 A Yes.</p> <p>19 <b>Q And it's separate from the PPS rate; correct?</b></p> <p>20 A It's separate from, yes.</p> <p>21 <b>Q And PPS means prospective payment system; is</b></p> <p>22 <b>that right?</b></p> <p>23 A Uh-huh, yes.</p> <p>24 <b>Q What does ETPS stand for?</b></p> <p>25 A Something payment system. I mean, I don't</p>

<p>1 know. I did know at one time, but I don't know now. Page 133</p> <p>2 <b>Q So -- okay. So you said that, like, FQHCs,</b></p> <p>3 <b>CCBHCs get paid based on their cost?</b></p> <p>4 A Yes.</p> <p>5 <b>Q How -- how are the costs calculated? How do</b></p> <p>6 <b>they determine -- how does DMH or OHCA determine what</b></p> <p>7 <b>the costs are?</b></p> <p>8 A Our CFO completes our cost report, and I</p> <p>9 couldn't tell you exactly what's in it and what's not.</p> <p>10 <b>Q Did -- did CMHCs ever complete cost reports</b></p> <p>11 <b>before they became CBHCs?</b></p> <p>12 A A CMH -- I mean, a -- no, it was all fee for</p> <p>13 service.</p> <p>14 <b>Q Are all CBHCs CMHCs?</b></p> <p>15 A I'm sorry?</p> <p>16 <b>Q Are all CBHCs also CMHCs?</b></p> <p>17 A No.</p> <p>18 <b>Q Are there some CBHCs that are not CMHCs?</b></p> <p>19 A There is no CMHCs in Oklahoma.</p> <p>20 <b>Q CMHCs don't exist anymore?</b></p> <p>21 A No. Now we are called CCBHCs under the state</p> <p>22 plan amendment.</p> <p>23 <b>Q So if a regulation refers to a CMHC, it's --</b></p> <p>24 <b>it's now referring to a CBHC --</b></p> <p>25 A Yes.</p>	<p>1 mean, I get paid a lot of money. Page 135</p> <p>2 <b>Q What is your salary?</b></p> <p>3 A 1,897,000.</p> <p>4 <b>Q Just confirm, are you still employed by Grand?</b></p> <p>5 A No.</p> <p>6 <b>Q Okay. So that was at the time of your --</b></p> <p>7 A Huh?</p> <p>8 <b>Q That's what -- your salary when you left Grand?</b></p> <p>9 A That's what my salary was.</p> <p>10 <b>Q Okay. And what was your salary in, say, 2020?</b></p> <p>11 A Salary is set by -- we had a -- Schnake Turnbo</p> <p>12 Frank do a study, and CEOs were paid one percent of</p> <p>13 their revenue in most cases. It averaged one percent.</p> <p>14 And the board set my salary at one percent of revenue.</p> <p>15 <b>Q Have you ever heard of requirements referred to</b></p> <p>16 <b>as private inurement?</b></p> <p>17 A Do what?</p> <p>18 <b>Q Private inurement? Are you familiar with that</b></p> <p>19 <b>term?</b></p> <p>20 A No.</p> <p>21 <b>Q Do you know what -- do you know how a</b></p> <p>22 <b>non-for-profit status can be affected based on private</b></p> <p>23 <b>inurement?</b></p> <p>24 A No.</p> <p>25 <b>Q Do you know what Adam Andreassen's salary is?</b></p>
<p>1 <b>Q -- is your understanding?</b> Page 134</p> <p>2 A That's my understanding.</p> <p>3 <b>Q I know you said you don't know, but I'm just</b></p> <p>4 <b>going to confirm. Do you know whether employee's</b></p> <p>5 <b>salaries are included in the cost reports?</b></p> <p>6 A Yes.</p> <p>7 <b>Q Does that include anyone other than therapists</b></p> <p>8 <b>or --</b></p> <p>9 A Includes all employees.</p> <p>10 <b>Q All employees? Does it include the CEO's</b></p> <p>11 <b>salary?</b></p> <p>12 A Yes.</p> <p>13 <b>Q And COO's?</b></p> <p>14 A Yes.</p> <p>15 <b>Q Does it include building costs?</b></p> <p>16 A Yes.</p> <p>17 <b>Q Are there any limits on the salaries that can</b></p> <p>18 <b>be included in a cost report and counted towards the</b></p> <p>19 <b>total costs?</b></p> <p>20 A Not that I'm aware of. And if there is, then</p> <p>21 they didn't count all my salary.</p> <p>22 <b>Q Okay. Why do you -- why do you say that?</b></p> <p>23 A Do what?</p> <p>24 <b>Q Why do you say that?</b></p> <p>25 A Because my salary is high, pretty high. I</p>	<p>1 A Who? Page 136</p> <p>2 <b>Q Adam Andreassen? Do you know who Adam</b></p> <p>3 <b>Andreassen is?</b></p> <p>4 A I don't know who Adam is or Jason is, I'm</p> <p>5 sorry.</p> <p>6 <b>Q Do you know who the CEO of FCS is right now?</b></p> <p>7 A Oh, Adam, yes.</p> <p>8 <b>Q I don't know if I'm saying his name correctly.</b></p> <p>9 <b>I think so. Do you know his salary?</b></p> <p>10 A No.</p> <p>11 <b>Q Do you know what Gail Lapidus' salary was when</b></p> <p>12 <b>she left FCS?</b></p> <p>13 A No.</p> <p>14 <b>Q Do you know what Brent Black's salary is?</b></p> <p>15 A No.</p> <p>16 <b>Q When did Schnake Turnbo do that study?</b></p> <p>17 A I believe it was three years ago. They're now</p> <p>18 doing another study at the request of the board to make</p> <p>19 sure that it meets the IRS regulations.</p> <p>20 <b>Q When they did the study, did they include</b></p> <p>21 <b>salaries for not-for-profit entities or was it just for</b></p> <p>22 <b>profit entities?</b></p> <p>23 A Non-for-profit.</p> <p>24 <b>Q So that would be -- so the study was based only</b></p> <p>25 <b>on review of nonprofit entities?</b></p>

<p>1 A I'm sorry?</p> <p>2 <b>Q The study was only based on the review of</b></p> <p>3 <b>salaries for nonprofit entities?</b></p> <p>4 A I'm not absolutely 100 percent sure of that,</p> <p>5 because it was given to the board of directors, not to</p> <p>6 me.</p> <p>7 <b>Q Who would be the best person on the board to</b></p> <p>8 <b>ask about that survey?</b></p> <p>9 A Probably Jim Tanner.</p> <p>10 <b>Q Who is on the -- who's on the Grand board?</b></p> <p>11 A Huh?</p> <p>12 <b>Q Who is on the board for Grand?</b></p> <p>13 A Jim Tanner, Tad Jones, Rick Littlefield, Wally</p> <p>14 Bryce, Joe Griffin.</p> <p>15 <b>Q Anyone else?</b></p> <p>16 A I'm thinking. There's nine members on the</p> <p>17 board, and I can't tell you who they are right now,</p> <p>18 except the ones I named.</p> <p>19 <b>Q So is it accurate to say then that CCBHCs per</b></p> <p>20 <b>member per month rate goes up if the CCBHC has higher</b></p> <p>21 <b>costs?</b></p> <p>22 A It's based upon -- yeah, not only the cost</p> <p>23 report but the number of clients you serve.</p> <p>24 <b>Q But the rate per member per month increases if</b></p> <p>25 <b>costs increase; correct?</b></p>	<p>Page 137</p> <p>1 <b>Q Anything else?</b></p> <p>2 A No. I know Grand Mental Health averages about</p> <p>3 seven clients -- seven hours per month per client.</p> <p>4 <b>Q And what do you mean by outreach when you say</b></p> <p>5 <b>outreach doesn't trigger it?</b></p> <p>6 A We -- when we came to Tulsa, drug and alcohol,</p> <p>7 and merged with 12&amp;12, we started doing outreach 24/7.</p> <p>8 Outreach in Tulsa up to that point, I believe -- I'm not</p> <p>9 sure -- was 8 to 5, Monday through Friday.</p> <p>10 <b>Q And by outreach, do you mean services provided</b></p> <p>11 <b>by non-clinicians to identify potential patients?</b></p> <p>12 A I'm sorry, say that again?</p> <p>13 <b>Q Is outreach performed by non-clinicians?</b></p> <p>14 A I think you have to be an RSS, but I'm not sure</p> <p>15 about that.</p> <p>16 <b>Q What's an RSS?</b></p> <p>17 A A CPRSS. That's a -- what I told you earlier,</p> <p>18 that you get certified through the Department of Mental</p> <p>19 Health with five days of training.</p> <p>20 <b>Q That's the peer --</b></p> <p>21 A Peer recovery support specialist. Certified</p> <p>22 means you have the training.</p> <p>23 <b>Q Do you ever have therapists perform outreach?</b></p> <p>24 A No.</p> <p>25 <b>Q So if a therapist provides a service to a</b></p>
<p>Page 138</p> <p>1 A If clients decrease or if the rate increases.</p> <p>2 Either way.</p> <p>3 <b>Q So do you know what -- what was Grand's rate,</b></p> <p>4 <b>when you left, for CCBHC services?</b></p> <p>5 A \$1,171 and some odd cents.</p> <p>6 <b>Q So let's say all the patients -- the number of</b></p> <p>7 <b>patients stays the same but the salaries of the</b></p> <p>8 <b>employees go up, that amount -- that 1,171 would also</b></p> <p>9 <b>increase because --</b></p> <p>10 A Yes.</p> <p>11 <b>Q -- of the costs increasing? And what -- what</b></p> <p>12 <b>has to occur in order for a CCBHC to bill for a member</b></p> <p>13 <b>in a month?</b></p> <p>14 A You have to provide a service.</p> <p>15 <b>Q Any service?</b></p> <p>16 A No. A billable service.</p> <p>17 <b>Q Just one service?</b></p> <p>18 A Yes.</p> <p>19 <b>Q Is that referred to as a trigger service?</b></p> <p>20 A Yes.</p> <p>21 <b>Q And what -- what kind of services can be</b></p> <p>22 <b>trigger services?</b></p> <p>23 A Therapy, doctor visit. Case management, I</p> <p>24 think, also does. Crisis, urgent care, billing would</p> <p>25 trigger. Outreach does not trigger it.</p>	<p>Page 140</p> <p>1 <b>patient, that is a trigger service? If a therapist</b></p> <p>2 <b>provides therapy to a patient, that would be a trigger</b></p> <p>3 <b>service?</b></p> <p>4 A Yes, or if a doctor saw them or a nurse.</p> <p>5 <b>Q Does it matter where the service is provided?</b></p> <p>6 A I don't believe so.</p> <p>7 <b>Q Are mobile crisis services, are those trigger</b></p> <p>8 <b>services?</b></p> <p>9 A Yes, I think so.</p> <p>10 <b>Q Are the -- so do you record trigger services on</b></p> <p>11 <b>an hourly basis, on a -- on a 15-minute basis?</b></p> <p>12 A Some are on 15 minutes, some are 30 minutes,</p> <p>13 some's 45 minutes, some's an hour. Crisis is seven</p> <p>14 days, up to seven days. URC is 23 hours and 59 minutes,</p> <p>15 but the client can volunteer to stay there after that</p> <p>16 time if they choose to.</p> <p>17 <b>Q Up to 23 hours, you mean?</b></p> <p>18 A After the 23 hours and 59 minutes. You</p> <p>19 cannot -- you can't meet the criteria of an EDO,</p> <p>20 emergency detention order --</p> <p>21 <b>Q But you can only bill 23 hours if the patient</b></p> <p>22 <b>is in URC?</b></p> <p>23 A 23 hours and 59 minutes, unless the client</p> <p>24 volunteers.</p> <p>25 <b>Q Okay. But let's say the client comes in for</b></p>

<p style="text-align: right;">Page 141</p> <p>1 <b>four hours and then says, I'm out of here, would you</b></p> <p>2 <b>only bill four hours or do you get the whole 23 hours?</b></p> <p>3 A Bill four hours. Or, I'm sorry, do you -- what</p> <p>4 did you say?</p> <p>5 <b>Q Did you catch what I said?</b></p> <p>6 A It -- it is a trigger service, so if somebody</p> <p>7 came and they were open chart and you billed four hours</p> <p>8 and they were only there four hours, then you would</p> <p>9 document that and only show that you billed for four</p> <p>10 hours. But you would still trigger a CCBHC payment.</p> <p>11 <b>Q Are the services provided at 12 to 12 (sic)</b></p> <p>12 <b>trigger services?</b></p> <p>13 A What?</p> <p>14 <b>Q Are the services provided by 12&amp;12 trigger</b></p> <p>15 <b>services?</b></p> <p>16 A Not CCBHC. That's under a fee for service</p> <p>17 under the drug and alcohol contract.</p> <p>18 <b>Q What happens if a individual who is enrolled</b></p> <p>19 <b>with one CBHC goes to another CBHC in the same month as</b></p> <p>20 <b>it goes to the first CBHC?</b></p> <p>21 A Only the CCBHC where the client's open first.</p> <p>22 You can't open a CCBHC client if it's already opened at</p> <p>23 another CCBHC.</p> <p>24 <b>Q So can the second CB -- CBHC provide services</b></p> <p>25 <b>to that individual?</b></p>	<p style="text-align: right;">Page 143</p> <p>1 <b>Q So then the -- in that situation then, the</b></p> <p>2 <b>first CCBHC would get paid the PPS rate, and the second</b></p> <p>3 <b>CCBHC would get their fee for service rate?</b></p> <p>4 A If they're Chapter 23.</p> <p>5 <b>Q So there could be two payments for one patient?</b></p> <p>6 A I'm not sure that a CCBHC that is certified as</p> <p>7 a CCBHC can be also Chapter 23 in the same catchment</p> <p>8 area. Now, they can in other catchment areas.</p> <p>9 <b>Q So if a patient that's enrolled with FCS comes</b></p> <p>10 <b>into Grand and receives services that Grand has a</b></p> <p>11 <b>Chapter 23 contract for in Grand's catchment area --</b></p> <p>12 A We don't --</p> <p>13 <b>Q -- Grand --</b></p> <p>14 MR. RATCLIFF: Objection. Wait until she</p> <p>15 finishes before you answer. Sorry.</p> <p>16 Sorry, Hilary.</p> <p>17 <b>Q (By Ms. Velandia) What was your response?</b></p> <p>18 A What was your answer -- question?</p> <p>19 MS. VELANDIA: Can you read me my question,</p> <p>20 please?</p> <p>21 THE REPORTER: You did not finish it --</p> <p>22 MS. VELANDIA: Okay.</p> <p>23 THE REPORTER: -- but I can read the portion --</p> <p>24 MS. VELANDIA: Okay. Okay. I'll ask it --</p> <p>25 well --</p>
<p style="text-align: right;">Page 142</p> <p>1 A Yeah -- yeah, consumer's -- client choice;</p> <p>2 however, we don't get paid if another CCBHC has that</p> <p>3 client as an open chart.</p> <p>4 <b>Q Do CCBHCs get paid by the other CBH -- CCBHC</b></p> <p>5 <b>for that service?</b></p> <p>6 A Only for crisis.</p> <p>7 <b>Q Are they -- are the CCBHCs required to</b></p> <p>8 <b>reimburse other CCBHCs in that situation?</b></p> <p>9 A I don't know if that's still in place or not,</p> <p>10 but it was in place at one time.</p> <p>11 <b>Q So if a -- if an individual, let's say, who's</b></p> <p>12 <b>in -- enrolled as a CCBHC client with CREOKS comes into</b></p> <p>13 <b>Grand to get therapy services, Grand can't bill that at</b></p> <p>14 <b>all?</b></p> <p>15 A Huh-uh.</p> <p>16 <b>Q You can't bill that --</b></p> <p>17 A No.</p> <p>18 <b>Q -- fee for service?</b></p> <p>19 A No. When you say can't bill it fee for</p> <p>20 service, I'm not 100 percent sure of that. Depends on</p> <p>21 whether you have a -- certified under Chapter 23 or not.</p> <p>22 <b>Q So if you have certified under Chapter 23, the</b></p> <p>23 <b>second CCBHC could bill under the Chapter 23 contract?</b></p> <p>24 A Yes. Any private provider can. Even a private</p> <p>25 therapist that's doing work out of her home.</p>	<p style="text-align: right;">Page 144</p> <p>1 <b>Q (By Ms. Velandia) So if a -- let's just, as an</b></p> <p>2 <b>example, if a patient who's enrolled as a CCBHC consumer</b></p> <p>3 <b>with FCS comes to receive therapy from Grand in Grand's</b></p> <p>4 <b>catchment area, can Grand bill for that as fee for</b></p> <p>5 <b>service?</b></p> <p>6 MR. RATCLIFF: Object to the form.</p> <p>7 THE WITNESS: I'm not sure I understand your</p> <p>8 question.</p> <p>9 <b>Q (By Ms. Velandia) Does Grand in 2020 -- in 2023</b></p> <p>10 <b>and 2024, did Grand have any Chapter 23 contracts</b></p> <p>11 <b>covering Tulsa County?</b></p> <p>12 A What year?</p> <p>13 <b>Q 2023.</b></p> <p>14 A Is that before they became a CCBHC or after?</p> <p>15 <b>Q Before they became a C -- well, before November</b></p> <p>16 <b>of 2023?</b></p> <p>17 A Okay. If it was before, then Grand could bill</p> <p>18 fee for service under Chapter 23.</p> <p>19 <b>Q And after -- after November of 2023, was Grand</b></p> <p>20 <b>a private provider under Chapter 23 in Tulsa County?</b></p> <p>21 A I don't think you can be a private provider.</p> <p>22 I'm not 100 percent sure about this, but I don't think</p> <p>23 you can be a private provider and be a CCBHC in your</p> <p>24 catchment area. You can only be a private provider</p> <p>25 outside of your catchment area.</p>

<p style="text-align: right;">Page 145</p> <p>1 <b>Q Did Carrie Slatton-Hodges tell Grand that it</b>  2 <b>couldn't bill for CCBHC services until after the</b>  3 <b>catchment areas were redrawn?</b>  4 A I'm not 100 percent sure on that, because what  5 I believe is that if you have a certified CCBHC clinic,  6 a certified CCBHC, you can provide services from there.  7 But I'm not 100 percent sure about that. I'd have to  8 ask my billing person.  9 <b>Q But did she ever tell you that?</b>  10 A Probably.  11 <b>Q When were the catchment lines redrawn for Tulsa</b>  12 <b>County?</b>  13 A Very recently. I mean, like two weeks ago --  14 or, no, a month ago maybe? I don't know the exact date.  15 <b>Q Have they actually been withdrawn or have there</b>  16 <b>just been proposed revisions?</b>  17 A I believe the CCBHC catchment areas have been  18 drawn. Grand Mental Health has east Tulsa, certain  19 street, certain area. Family &amp; Children's Services has  20 north Tulsa and central -- I guess downtown Tulsa area.  21 We were already in some schools, and it's still client  22 choice. The schools asked us to come in, so we may very  23 well be billing CCBHC outside of our catchment area  24 because client choice.  25 <b>Q School -- so services provided in schools are</b></p>	<p style="text-align: right;">Page 147</p> <p>1 A I don't know if we started immediately or not,  2 but we -- we got permission from Department of Mental  3 Health based upon Josh's meeting with Adam, which I  4 wasn't there. And Josh and Adam kind of agreed that  5 open catchment area made sense for Tulsa. Now, I don't  6 know if that created the ability to bill CCBHC or the  7 fact that we have a outpatient clinic that is certified  8 to bill CCBHC services. I'm not sure which one of those  9 is true or false.  10 <b>Q You said there was an agreement between Adam</b>  11 <b>and Josh? Was that -- are you talking about Josh</b>  12 <b>Cantwell?</b>  13 A That's what Josh informed me of, that he met  14 with Adam and Adam kind of agreed to open catchment  15 areas.  16 <b>Q Is that in writing?</b>  17 A No, I don't think. You'd have to ask Josh. I  18 wasn't there.  19 <b>Q But he wouldn't -- if he had an agreement with</b>  20 <b>FCS, he wouldn't have given you a copy of it if it was</b>  21 <b>in writing?</b>  22 MR. RATCLIFF: Objection. Answer if you know.  23 THE WITNESS: Question?  24 <b>Q (By Ms. Velandia) If Grand had entered into an</b>  25 <b>agreement with FCS and Josh had that in writing, he</b></p>
<p style="text-align: right;">Page 146</p> <p>1 <b>trigger services?</b>  2 A Sorry?  3 <b>Q Schools -- services provided in schools are</b>  4 <b>trigger services for CCBHCs?</b>  5 A Are what?  6 <b>Q Trigger services?</b>  7 A If a therapist does it or if -- a behavioral  8 health coach, I believe, also qualifies for a CCBHC  9 service.  10 <b>Q When did Grand start billing CBHC services in</b>  11 <b>Tulsa County?</b>  12 A I couldn't tell you that.  13 <b>Q Was it before you left as CEO?</b>  14 A Yes.  15 <b>Q And when did you leave Grand?</b>  16 A November the 18th.  17 <b>Q Can you -- can you remember with any -- I'm</b>  18 <b>sorry, can you generally remember any -- sorry, let me</b>  19 <b>do it this way. Did Grand begin billing CCBHC services</b>  20 <b>for Tulsa County in the first half of 2024?</b>  21 A The RFP came out and was let on December 1st, I  22 believe. November 30 or December 1st, somewhere in  23 that.  24 <b>Q And that's when Grand started billing for CCBHC</b>  25 <b>services in Tulsa County?</b></p>	<p style="text-align: right;">Page 148</p> <p>1 <b>wouldn't give that to the CEO?</b>  2 MR. RATCLIFF: Objection.  3 Answer if you know.  4 THE WITNESS: Josh is responsible for the  5 operations of Grand Mental Health as the COO. Chief  6 operating officer means he operates Grand Mental Health.  7 <b>Q (By Ms. Velandia) So that's a no?</b>  8 A Huh?  9 <b>Q So your answer is no?</b>  10 A What was the question?  11 <b>Q So if there were agreements -- we'll just --</b>  12 <b>we'll just drop it. Okay. So just to confirm, Grand</b>  13 <b>started billing for CCBHC services in Tulsa County</b>  14 <b>sometime around the first quarter of 2024?</b>  15 A You would have to ask Josh that.  16 <b>Q But it was sometime in 2024 before you left?</b>  17 A Yes, I believe so.  18 <b>Q Was it more than a month before you left?</b>  19 A I'm not even sure that we're billing CCBHC  20 services right now. We may still be doing something  21 else. I don't know.  22 <b>Q You testified earlier that you were.</b>  23 A What?  24 <b>Q You testified earlier that you were.</b>  25 A Were what?</p>

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1 **Q That you were billing CCBHC services in Tulsa**  
 2 **County.**  
 3 A I believe that to be true, but I'm not  
 4 100 percent sure.  
 5 **Q And do you --**  
 6 A So I don't know if I testified to that or not  
 7 earlier.  
 8 **Q Well, you keep changing your testimony.**  
 9 A Huh?  
 10 **Q You keep changing your testimony. You did**  
 11 **testify to that earlier.**  
 12 A Okay.  
 13 MR. DEMURO: Objection. Argumentative.  
 14 **Q (By Ms. Velandia) And now you're saying you**  
 15 **don't know?**  
 16 A If you say so.  
 17 **Q So now you're saying you don't know whether --**  
 18 A That's correct.  
 19 **Q -- or not -- so you have no idea if Grand was**  
 20 **providing and billing for CCBHC services before**  
 21 **October of 2024?**  
 22 MR. RATCLIFF: Objection.  
 23 MR. DEMURO: Objection. Argumentative.  
 24 MR. RATCLIFF: Answer the question.  
 25 MS. VELANDIA: He can still answer. They're

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1 going to say whatever they want as an objection.  
 2 THE WITNESS: What was the question again?  
 3 MS. VELANDIA: He's already said it confuses  
 4 him, so we don't need to be talking objections.  
 5 MR. DEMURO: There was no talking objection.  
 6 It was objection, argumentative. What's talking about  
 7 that, counsel?  
 8 MS. VELANDIA: Well, he's already said it's  
 9 confusing him.  
 10 MR. DEMURO: That's not my concern. I'm  
 11 entitled to make an objection.  
 12 MS. VELANDIA: You are entitled to make an  
 13 objection, but just make it and go on.  
 14 MR. DEMURO: I did. You're the one that  
 15 brought it back up.  
 16 MS. VELANDIA: Can you repeat my question,  
 17 please?  
 18 (Reporter read back requested portion.)  
 19 THE WITNESS: We couldn't have billed CCBHC  
 20 services until we were -- until the RFP was answered and  
 21 we won it, which would have been the late November,  
 22 early December.  
 23 **Q (By Ms. Velandia) When did you learn that Grand**  
 24 **was going to be awarded the RFP for Tulsa County CCBHC?**  
 25 A The day it was awarded.

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1 **Q What day was that?**  
 2 A I don't know. Come on. Oh --  
 3 **Q Approximately -- can you just --**  
 4 A -- wait a minute, wait a minute. I take that  
 5 back. I believe it was December the 1st or November the  
 6 30th.  
 7 **Q And how did you learn that Grand was awarded**  
 8 **the RFP?**  
 9 A Josh came in and told me.  
 10 **Q And how had he learned?**  
 11 A What?  
 12 **Q How had he learned?**  
 13 A You have to ask Josh.  
 14 **Q Did you have any discussions with anyone at DMH**  
 15 **about the RFP between the time that it was announced and**  
 16 **the time that it was awarded?**  
 17 A From the time it was announced until the time  
 18 it was rewarded, no. Not that I recall, by the way.  
 19 It's no to the best of my knowledge.  
 20 **Q A lot of these I've already asked, so I'm just**  
 21 **going through my notes. Did you receive any kind of a**  
 22 **bonus when Grand was awarded the CCBHC for Tulsa County?**  
 23 A No.  
 24 **Q What about when the catchment areas were**  
 25 **changed?**

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1 A When what?  
 2 **Q When the catchment lines were changed for Tulsa**  
 3 **County?**  
 4 A No.  
 5 **Q Have you discussed the RFP with anyone, other**  
 6 **than your attorneys, since you left Grand?**  
 7 A No.  
 8 **Q Have you talked to Carrie Slatton-Hodges since**  
 9 **you left Grand?**  
 10 A No.  
 11 **Q How about Josh -- how about Heath Hayes?**  
 12 A Do what?  
 13 **Q How about Heath Hayes?**  
 14 A Who? Oh, Heath Hayes, no.  
 15 **Q Who is -- who is Heath Hayes?**  
 16 A He's a male that lives in Oklahoma City.  
 17 **Q Did he used to work at DMH?**  
 18 A Yes, he did.  
 19 **Q What was his role when he was at DMH?**  
 20 A I believe it had to do with the legislators,  
 21 communicating with the legislators about the needs of  
 22 mental health, trying to get more money.  
 23 **Q As a CCBHC provider in Oklahoma, did you ever**  
 24 **communicate with Heath Hayes about CCBHC services?**  
 25 A With who?

<p>Page 153</p> <p>1 <b>Q Heath Hayes?</b></p> <p>2 A About CCBHC services?</p> <p>3 <b>Q (Attorney moves head up and down.)</b></p> <p>4 A It's possible, but I don't recall exactly what</p> <p>5 was said or when it was said.</p> <p>6 <b>Q Did you serve on speaking panels to present --</b></p> <p>7 <b>to make presentations with Carrie Slatton-Hodges?</b></p> <p>8 A We ran into each other in Washington, D.C., and</p> <p>9 we were both presenting.</p> <p>10 <b>Q Was that just one time?</b></p> <p>11 A That's it, I believe. She might have been in</p> <p>12 the audience when I was doing a webinar.</p> <p>13 <b>Q But she never spoke on a panel that you were</b></p> <p>14 <b>on, other than that time in Washington, D.C.?</b></p> <p>15 A Not that I recall.</p> <p>16 <b>Q And what was that conference for?</b></p> <p>17 A It was for the consultants at -- or, no, it was</p> <p>18 to do a white paper, and they were getting information</p> <p>19 to work on a white paper.</p> <p>20 <b>Q Who was getting the information?</b></p> <p>21 A Huh?</p> <p>22 <b>Q Who? Who was getting information?</b></p> <p>23 A National counsel.</p> <p>24 <b>Q And do you know how it came about that you and</b></p> <p>25 <b>Carrie were both on the same panel?</b></p>	<p>Page 155</p> <p>1 <b>Carrie Slatton-Hodges' house?</b></p> <p>2 A No.</p> <p>3 <b>Q Did you ever attend any dinners or events at</b></p> <p>4 <b>Nisha Wilson's house?</b></p> <p>5 A No.</p> <p>6 <b>Q Wendy Larsen's house?</b></p> <p>7 A No.</p> <p>8 <b>Q Did you ever -- did you ever have dinner or any</b></p> <p>9 <b>other kind of social gathering with any other DMH staff?</b></p> <p>10 A No.</p> <p>11 <b>Q With Carrie Slatton-Hodges?</b></p> <p>12 A No.</p> <p>13 <b>Q Who's (unintelligible)?</b></p> <p>14 THE REPORTER: I'm sorry?</p> <p>15 <b>Q (By Ms. Velandia) Who is CohnReznick? It's</b></p> <p>16 <b>C-O-H-N, and then new word, R-A-S-N-I-C-K (sic).</b></p> <p>17 A They are a firm that after the announcement</p> <p>18 came out for the RFP, we had them help us with the RFP.</p> <p>19 <b>Q Did you discuss the RFP with them before it was</b></p> <p>20 <b>announced?</b></p> <p>21 A No.</p> <p>22 <b>Q And what did they do to help with the RFP?</b></p> <p>23 A They are pretty well professional writers and,</p> <p>24 you know, read the RFP, gave us feedback in what we</p> <p>25 might want to do differently in it, but not as far as</p>
<p>Page 154</p> <p>1 A How that came about? I have no idea. I didn't</p> <p>2 know she was going to be on the panel.</p> <p>3 <b>Q Did Grand have a contract with national counsel</b></p> <p>4 <b>at that time?</b></p> <p>5 A I did personally.</p> <p>6 <b>Q You, as an individual, had a contract with</b></p> <p>7 <b>national counsel?</b></p> <p>8 A Uh-huh.</p> <p>9 <b>Q And what was that contract for?</b></p> <p>10 A It was to put on webinars and talk about</p> <p>11 everything from how we do crisis to the iPads through</p> <p>12 the -- why we are -- why we are so successful.</p> <p>13 <b>Q Did you ever recommend that Carrie</b></p> <p>14 <b>Slatton-Hodges be included on a panel for national</b></p> <p>15 <b>counsel?</b></p> <p>16 A Do what?</p> <p>17 <b>Q Did you ever recommend that Carrie</b></p> <p>18 <b>Slatton-Hodges be asked to speak at --</b></p> <p>19 A No.</p> <p>20 <b>Q -- at that event for national counsel?</b></p> <p>21 A No. Sorry. Got a little anxious there.</p> <p>22 <b>Q Did you ever see Carrie Slatton-Hodges</b></p> <p>23 <b>socially?</b></p> <p>24 A No.</p> <p>25 <b>Q Did you ever attend any dinners or events at</b></p>	<p>Page 156</p> <p>1 services go, no. Just the writing of it.</p> <p>2 <b>Q Like, what specifically about the writing of it</b></p> <p>3 <b>did they help with?</b></p> <p>4 A You'd have to ask Josh that.</p> <p>5 <b>Q Did they help with identifying how to score</b></p> <p>6 <b>higher?</b></p> <p>7 A What?</p> <p>8 <b>Q Did they help identify ways to score higher?</b></p> <p>9 A You'd have to ask Josh that.</p> <p>10 <b>Q Who's Joan McNamara?</b></p> <p>11 A I don't think I know that name.</p> <p>12 <b>Q Did Grand engage Schnake Turnbo to do anything</b></p> <p>13 <b>to help with the RFP in Tulsa?</b></p> <p>14 A No.</p> <p>15 <b>Q Did you ever discuss the RFP in Tulsa with</b></p> <p>16 <b>anyone from Schnake Turnbo?</b></p> <p>17 A After it was let or before or what?</p> <p>18 <b>Q At any time?</b></p> <p>19 A No.</p> <p>20 <b>Q Do you know whether Josh Cantwell spoke with</b></p> <p>21 <b>Schnake Turnbo about the RFP?</b></p> <p>22 A Do what?</p> <p>23 <b>Q Do you know whether Josh Cantwell spoke with</b></p> <p>24 <b>Schnake Turnbo about the RFP?</b></p> <p>25 A I -- I don't understand your question.</p>

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1 **Q Do you know whether Josh Cantwell ever spoke**  
 2 **with Schnake Turnbo about the RFP?**  
 3 A You'd have to ask Josh that.  
 4 **Q He never told you that he did?**  
 5 A No.  
 6 **Q Who is Kevin Matthews?**  
 7 A He's a person that we hired to lead us into  
 8 north Tulsa. I -- I believe we hired him when we were a  
 9 twenty -- Chapter 23. We were trying to figure out how  
 10 to get services into north Tulsa, and he is from north  
 11 Tulsa. He also happens to be a senator, but that's not  
 12 why we hired him.  
 13 **Q And how much was he paid?**  
 14 A I think 200,000.  
 15 **Q And what did he do for Grand specifically?**  
 16 A Set up meetings with people in north Tulsa,  
 17 with other therapists in north Tulsa, with the who's  
 18 who's in north Tulsa, and also assisted us with a  
 19 Cherokee tribe as a Freedmen.  
 20 **Q How many hours would he work a month for Grand**  
 21 **Mental Health?**  
 22 A You'd have to ask Josh that.  
 23 **Q Do you know whether that was tracked?**  
 24 A What?  
 25 **Q Do you know whether the amount of hours that he**

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1 **worked a month were tracked? Did Grand track how many**  
 2 **hours Senator Matthews provided services?**  
 3 A You'd have to ask Josh that.  
 4 **Q Did Senator Matthews have an office at Grand?**  
 5 A Yes.  
 6 **Q How often did he come in?**  
 7 A You'd have to ask Josh that.  
 8 **Q Was his office near your office?**  
 9 A No.  
 10 **Q Was his office near Josh's office?**  
 11 A No.  
 12 **Q Where is your office?**  
 13 A My office is in Skyline I. His office was in  
 14 Skyline II.  
 15 **Q And where is Josh Cantwell's office?**  
 16 A Skyline I.  
 17 **Q And he was an employee of Grand?**  
 18 A Who?  
 19 **Q Senator Matthews?**  
 20 A Yes.  
 21 **Q What is Healthy Minds Healthy Lives?**  
 22 A Healthy Minds Healthy Lives. I don't know.  
 23 **Q Are you familiar with any foundations that are**  
 24 **affiliated with Department of Mental Health?**  
 25 A No.

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1 **Q Just to help refresh your memory, if I told you**  
 2 **that Healthy Minds Healthy Lives is a foundation**  
 3 **affiliated with Department of Mental Health, does that**  
 4 **help you recall anything about --**  
 5 A No, I don't --  
 6 **Q -- Healthy Minds Healthy Lives?**  
 7 A -- know anything about Healthy Minds Healthy --  
 8 whatever it is you said.  
 9 **Q Did Grand ever make any donations to any**  
 10 **foundations associated with the Department of Mental**  
 11 **Health?**  
 12 A No.  
 13 **Q Did -- did Carrie Slatton-Hodges ever comment**  
 14 **about Gail Lapidus when she was in your presence?**  
 15 A No.  
 16 **Q Did you hear anybody from DMH ever comment**  
 17 **about Gail Lapidus when they were in your presence?**  
 18 A Not that I recall.  
 19 **Q Did you regularly talk to Gail Lapidus in 2022**  
 20 **and 2023?**  
 21 A No.  
 22 **Q Did you ever talk to her in 2022 or 2023?**  
 23 A Probably not. I don't know. I don't recall  
 24 ever sitting down and having a conversation with her.  
 25 She was difficult to deal with.

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1 **Q Why she was difficult to deal with?**  
 2 A Okay. She -- she would cut you off when you  
 3 were trying to talk. She would belittle you kind of in  
 4 a way, and I don't even know what I mean by that, but  
 5 she just acted like she was better than everybody else,  
 6 every other CEO that -- that I'm aware of. She just  
 7 acted like she was better.  
 8 **Q Any other way? Anything else she did?**  
 9 A No.  
 10 **Q Did you ever hear anybody from DMH call Tulsa**  
 11 **the enemy of the state?**  
 12 A Who?  
 13 **Q Did you ever hear anybody from DMH call Tulsa**  
 14 **the enemy of the state?**  
 15 A I'm not catching the word.  
 16 **Q Did you ever hear anyone from DMH refer to**  
 17 **Tulsa as enemy of the state?**  
 18 A No.  
 19 **Q How about the State of Tulsa?**  
 20 A I'm not sure, but it -- it is a different -- it  
 21 is different than most communities.  
 22 **Q How is it different?**  
 23 A Had a lot of foundations, a lot of money, a lot  
 24 of people supporting different things. Their United Way  
 25 is a major fund drive, and it's also their 100th year

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1 this year. And I don't think -- in rural America, that  
 2 doesn't -- doesn't exist.

3 **Q Earlier you talked about rumors in Tulsa**  
 4 **County, and I think at that time we were talking about**  
 5 **when you were CFO and then when you came into Tulsa**  
 6 **County in two thousand -- 2002. Were there rumors --**  
 7 **are there -- in the last three years, have there been**  
 8 **rumors in Tulsa County that cause you concern about**  
 9 **providing services in Tulsa County?**

10 MR. RATCLIFF: Object to the form.

11 THE WITNESS: I believe I already answered  
 12 that, but go ahead. Ask it again?

13 **Q (By Ms. Velandia) In the last three years, have**  
 14 **there been rumors going around Tulsa County that cause**  
 15 **you concern about providing services in Tulsa County?**

16 MR. RATCLIFF: Same objection.

17 THE WITNESS: Not that I recall.

18 **Q (By Ms. Velandia) You're not aware of any**  
 19 **rumors that Grand Mental Health is being investigated by**  
 20 **the government?**

21 A I couldn't tell you if there was, because it  
 22 says very clearly that you can't discuss this, you can't  
 23 tell anybody about it, so I don't know.

24 **Q What --**

25 A Does this exempt me from the law to tell her

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1 about --

2 MR. RATCLIFF: Objection. Object to the  
 3 question.

4 THE WITNESS: The question again?

5 **Q (By Ms. Velandia) Are there any**  
 6 **investigations -- have there been any investigations**  
 7 **into Grand Mental Health conducted by the government in**  
 8 **the last four years?**

9 MR. RATCLIFF: I'll instruct the witness not to  
 10 answer.

11 MS. VELANDIA: Based on?

12 MR. RATCLIFF: I instruct the witness not to  
 13 answer. If you want to take it up with the Judge, be my  
 14 guest.

15 **Q (By Ms. Velandia) You said that something tells**  
 16 **you not to discuss it. What was that something?**

17 A What?

18 MR. RATCLIFF: I'll instruct the witness not to  
 19 answer.

20 **Q (By Ms. Velandia) Are you or have you been**  
 21 **investigated personally by the government in the last**  
 22 **five years?**

23 A No.

24 **Q Has Josh Cantwell been investigated by the**  
 25 **government personally --**

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1 A Not that I know of.

2 **Q -- in the last five years? Has Dashun Monk**  
 3 **been investigated personally by the government in the**  
 4 **last five years?**

5 A Not that I know of.

6 **Q Are you aware of any federal investigations of**  
 7 **DMH in the last six years?**

8 A No.

9 **Q How about state investigations of DMH in the**  
 10 **last six years?**

11 A No.

12 **Q Going back to earlier this morning, you said**  
 13 **that you learned about fraud and abuse issues from**  
 14 **Medicaid manuals; is that -- that's correct?**

15 A Yeah, reading the -- reading -- reading up on  
 16 what's considered.

17 **Q What's your understanding about what's required**  
 18 **by the fraud and abuse laws?**

19 A What's required?

20 MR. RATCLIFF: Object to the form.

21 **Q (By Ms. Velandia) What is your understanding**  
 22 **about what is prohibited by the Medicaid fraud and abuse**  
 23 **laws?**

24 MR. RATCLIFF: Same objection.

25 THE WITNESS: You --

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1 MR. RATCLIFF: You can answer.

2 THE WITNESS: Yeah, you -- one of the main  
 3 things is a clinician seeing somebody and not  
 4 documenting it, I think, is a -- is a problem, but I  
 5 don't think that's abuse. But if a client -- if a  
 6 therapist or somebody saw a client or said they saw a  
 7 client and only wrote a progress note, that would  
 8 definitely be Medicaid fraud.

9 **Q (By Ms. Velandia) What else is your -- I'm**  
 10 **sorry, based on your understanding, what else can be**  
 11 **prohibited by the Medicaid fraud and abuse laws?**

12 A That -- you have to ask Becky Foster that.

13 **Q So you don't know about anything else that's**  
 14 **prohibited by the Medicaid fraud and abuse laws, other**  
 15 **than what --**

16 A Not --

17 **Q -- you just described?**

18 A Not that I recall.

19 **Q Have you ever heard of the False Claims Act?**

20 A No.

21 **Q Do you know what the company called MyCare**  
 22 **does?**

23 A Yes.

24 **Q What do they do?**

25 THE REPORTER: I'm sorry.

<p style="text-align: right;">Page 165</p> <p>1 MS. VELANDIA: Do you need a break? Let's take 2 a break.</p> <p>3 THE VIDEOGRAPHER: Off the record at 2:03 p.m. 4 (Recess taken from 2:03 p.m. to 2:49 p.m.)</p> <p>5 THE VIDEOGRAPHER: Back on the record at 6 2:49 p.m.</p> <p>7 <b>Q (By Ms. Velandia) So I think I had asked you if 8 you know what the company MyCare does?</b></p> <p>9 A Yes.</p> <p>10 <b>Q What do they do?</b></p> <p>11 A In 2015, started creating a video type of way 12 to talk to our clients into -- put out in police cars, 13 and so the Grand board gave that to Jeff Hunter, who 14 runs MyCare, and with the -- with the intent of them 15 developing it to where we needed to be so we could 16 provide services anytime anywhere. About a thousand of 17 those are in -- about a thousand of those are in police 18 cars in northeast Oklahoma and sheriff cars, and the 19 remainder of those, about 8,000, is in client's homes, 20 with some of our sickest clients, so they can have 21 access to a therapist 24/7.</p> <p>22 <b>Q So does Grand have ownership interest in 23 MyCare?</b></p> <p>24 A Do what?</p> <p>25 <b>Q Does Grand have ownership interest in MyCare?</b></p>	<p style="text-align: right;">Page 167</p> <p>1 <b>Q Okay.</b></p> <p>2 A So we buy a data plan for them.</p> <p>3 <b>Q So Grand licenses the software from MyCare --</b></p> <p>4 A No.</p> <p>5 <b>Q -- that's used on --</b></p> <p>6 A MyCare has the license, not us. We purchased 7 the license and the data plan from MyCare.</p> <p>8 <b>Q You purchased it for MyCare?</b></p> <p>9 A From MyCare.</p> <p>10 <b>Q From MyCare. And when you say license, you 11 mean, like, the license to use it, the ability to use 12 it?</b></p> <p>13 A Uh-huh.</p> <p>14 <b>Q And then the iPads are used by law enforcement 15 too?</b></p> <p>16 A Yes.</p> <p>17 <b>Q But does Grand buy those for law enforcement?</b></p> <p>18 A Yes. And pay for the license.</p> <p>19 <b>Q Would the cost for buying the license and 20 buying the iPads be included in the cost report for 21 CCBHC?</b></p> <p>22 A Yes.</p> <p>23 <b>Q Does -- it's my understanding that DMH has also 24 purchased iPads from MyCare; is that your understanding?</b></p> <p>25 A I -- I'm not involved with MyCare to the point</p>
<p style="text-align: right;">Page 166</p> <p>1 A The source code for MyCare has to be given to 2 Grand if -- if MyCare goes out of business or whatever, 3 so they have a -- the source code.</p> <p>4 <b>Q So Grand owns the source code?</b></p> <p>5 A No, MyCare owns the source code, but it's in 6 the contract that MyCare has to give us a copy of their 7 source code.</p> <p>8 <b>Q Did -- when Jeff Hunter created the MyCare 9 software, was he employed by Grand or by MyCare?</b></p> <p>10 A He owns MyCare. He was not employed by Grand.</p> <p>11 <b>Q Was there ever any kind of ownership 12 relationship between MyCare and Grand?</b></p> <p>13 A No.</p> <p>14 <b>Q So did -- did Grand contract with MyCare to 15 create that software?</b></p> <p>16 A Yes.</p> <p>17 <b>Q And that's --</b></p> <p>18 A When you say contract, we paid for the license 19 of that, which allows him to use those funds to develop 20 MyCare.</p> <p>21 <b>Q So you paid for the license of the software?</b></p> <p>22 A Yes, and the data plan. All of our iPads are 23 on a data plan so we don't take the risk of a client not 24 having Internet in their home and we don't take the risk 25 of a police officer having Internet in his car.</p>	<p style="text-align: right;">Page 168</p> <p>1 that I would know who's buying or selling or -- 2 software.</p> <p>3 <b>Q Do you -- do you know what percentage of the 4 CCBH (sic) funds come from the federal government as 5 opposed to the state?</b></p> <p>6 A At one time when it first started up in the 7 demonstration model, it was 90 percent fed, 10 percent 8 state. Now I think it's maybe 20 percent or better 9 state and less feds.</p> <p>10 <b>Q Do you have any family that has any ownership 11 interest in MyCare?</b></p> <p>12 A Say what?</p> <p>13 <b>Q Do you have any family members who have 14 ownership interest in MyCare?</b></p> <p>15 A No.</p> <p>16 <b>Q Do you personally have any ownership interest 17 in --</b></p> <p>18 A No.</p> <p>19 <b>Q -- MyCare? Do you know who Brian Smith is who 20 works at MyCare?</b></p> <p>21 A No. I know who Brian Sample is.</p> <p>22 <b>Q And he works at MyCare?</b></p> <p>23 A Yes.</p> <p>24 <b>Q Is he a relation of yours?</b></p> <p>25 A He is the son of my partner.</p>

<p style="text-align: right;">Page 169</p> <p>1 <b>Q Of your business partner or your --</b></p> <p>2 A My wife, for a better word.</p> <p>3 <b>Q Okay. Okay.</b></p> <p>4 A But not married to her.</p> <p>5 <b>Q Okay. So if you were married, he would be your</b></p> <p>6 <b>stepson, but he's -- but you're not married?</b></p> <p>7 A Yes, he would.</p> <p>8 <b>Q And what's his role at MyCare?</b></p> <p>9 A I believe, based upon what he's told me, is</p> <p>10 that he does all sales outside of Oklahoma.</p> <p>11 <b>Q Do you know whether he has an ownership</b></p> <p>12 <b>interest in MyCare?</b></p> <p>13 A What?</p> <p>14 <b>Q Do you know whether he has an ownership</b></p> <p>15 <b>interest in MyCare?</b></p> <p>16 A He does not.</p> <p>17 <b>Q Are there any other entities or companies that</b></p> <p>18 <b>pay for a license from MyCare?</b></p> <p>19 A Like -- I don't understand the question.</p> <p>20 <b>Q Do any other entities license that software</b></p> <p>21 <b>from MyCare?</b></p> <p>22 A You would have to ask MyCare. I don't know.</p> <p>23 <b>Q Do you know of any other CMHCs or CBHCs that</b></p> <p>24 <b>provide iPads and software to referral sources?</b></p> <p>25 A For what?</p>	<p style="text-align: right;">Page 171</p> <p>1 doctor and licensed professional counselors. We do a</p> <p>2 breath test on how intoxicated they are and -- but we go</p> <p>3 ahead and accept them, and then if -- if they go -- if</p> <p>4 they're not medically stable, we call 911 and we have an</p> <p>5 ambulance come pick them up.</p> <p>6 <b>Q (By Ms. Velandia) How many hours would you bill</b></p> <p>7 <b>for a patient in that situation? How would you</b></p> <p>8 <b>determine how many hours?</b></p> <p>9 A In -- in the urgent care, it would be 23 hours</p> <p>10 and 59 minutes. That's all you can bill.</p> <p>11 <b>Q But would you bill for the time that they were</b></p> <p>12 <b>at the emergency room?</b></p> <p>13 A No.</p> <p>14 <b>Q So is it a violation of the standard of care to</b></p> <p>15 <b>admit a client to a URC when the client is not medically</b></p> <p>16 <b>stable?</b></p> <p>17 MR. RATCLIFF: Objection.</p> <p>18 <b>Q (By Ms. Velandia) Just yes or no.</b></p> <p>19 A What's the question?</p> <p>20 <b>Q Is it a violation of the standard of care to</b></p> <p>21 <b>admit a client to a URC when the client is not medically</b></p> <p>22 <b>stable?</b></p> <p>23 MR. RATCLIFF: Same objection.</p> <p>24 THE WITNESS: No, but it could happen.</p> <p>25 <b>Q (By Ms. Velandia) It's not a standard of</b></p>
<p style="text-align: right;">Page 170</p> <p>1 <b>Q Do you know of any other CMHCs or CBHCs that</b></p> <p>2 <b>provide iPads and software to referral sources?</b></p> <p>3 A No.</p> <p>4 <b>Q Does the police department reimburse Grand for</b></p> <p>5 <b>how much Grand pays for the iPads and the software?</b></p> <p>6 A No.</p> <p>7 <b>Q Are you aware of any other CMHCs or CBHCs that</b></p> <p>8 <b>provide their patients or their consumers with iPads and</b></p> <p>9 <b>software?</b></p> <p>10 A No.</p> <p>11 <b>Q Is it a violation of the standard of care to</b></p> <p>12 <b>admit a client to a URC when the client's not medically</b></p> <p>13 <b>stable?</b></p> <p>14 MR. RATCLIFF: Object to the form.</p> <p>15 Answer if you know.</p> <p>16 THE WITNESS: Can I answer?</p> <p>17 MR. RATCLIFF: You can answer if you know.</p> <p>18 THE WITNESS: Okay. Sorry. Question?</p> <p>19 <b>Q (By Ms. Velandia) Is it a violation of the</b></p> <p>20 <b>standard of care to admit a client to a URC when the</b></p> <p>21 <b>client is not medically stable?</b></p> <p>22 MR. RATCLIFF: Same objection.</p> <p>23 THE WITNESS: Standard of care. If a client</p> <p>24 can -- if a client's not medically stable, we -- we</p> <p>25 determine that after they're there by nurses and a</p>	<p style="text-align: right;">Page 172</p> <p>1 <b>care -- it's not a violation of the standard of care but</b></p> <p>2 <b>it could happen? What do you mean? Can you explain</b></p> <p>3 <b>that?</b></p> <p>4 A Somebody walks in our door or a police officer</p> <p>5 brings them in or a family member brings them in or we</p> <p>6 go pick them up because they called our crisis line, and</p> <p>7 we bring the person in. At that point, a nurse does an</p> <p>8 exam on them and determines whether they're medically</p> <p>9 stable or not, and if they're not, then we call 911 for</p> <p>10 an ambulance.</p> <p>11 <b>Q So what did you mean by when you say it can</b></p> <p>12 <b>happen though?</b></p> <p>13 A It could happen that somebody is not medically</p> <p>14 stable and they come to our crisis center, yeah, because</p> <p>15 it could happen. I mean, there's no urgent care or</p> <p>16 anything else out there that you can take a client by</p> <p>17 and have them checked out, except the emergency room.</p> <p>18 And most of our clients don't go to the emergency room</p> <p>19 ever, because it is a free-for-all.</p> <p>20 <b>Q What do you mean by a free-for-all?</b></p> <p>21 A Jesus. Okay. In an emergency room, people are</p> <p>22 treating life and death situations, and people are</p> <p>23 running up and down the hall, the beepers are going off</p> <p>24 and all kind of stuff, and if you're mentally ill, that</p> <p>25 can overstimulate you, and then you could possibly get</p>

<p style="text-align: right;">Page 173</p> <p>1 into where you want to leave or you get into a fight or</p> <p>2 you get in another situation, and now you have four</p> <p>3 misdemeanors and two felonies on you and all you did was</p> <p>4 go to the emergency room.</p> <p>5 <b>Q Thanks. What is your phone number?</b></p> <p>6 A 918-402-1031.</p> <p>7 <b>Q Is that your mobile phone number?</b></p> <p>8 A Yes.</p> <p>9 <b>Q Have you ever -- have you used another mobile</b></p> <p>10 <b>phone number in the last five years?</b></p> <p>11 A Have I used that number?</p> <p>12 <b>Q Have you used any other mobile phone number in</b></p> <p>13 <b>the last --</b></p> <p>14 A Yes.</p> <p>15 <b>Q -- five years? What was that other mobile</b></p> <p>16 <b>phone number?</b></p> <p>17 A 918-443-7376, 918-697-4820.</p> <p>18 <b>Q The 4820 number, was that a phone that you</b></p> <p>19 <b>owned or was that a phone that was issued by Grand?</b></p> <p>20 A That's issued by Grand.</p> <p>21 <b>Q Do you still have that phone?</b></p> <p>22 A No.</p> <p>23 <b>Q Do you still have any of the data that was on</b></p> <p>24 <b>that phone?</b></p> <p>25 A No. Let me take that back; okay?</p>	<p style="text-align: right;">Page 175</p> <p>1 <b>Q (By Ms. Velandia) Okay. I'm going to put what</b></p> <p>2 <b>I'm marking as Exhibit 1 on the screen. Can you read</b></p> <p>3 <b>that?</b></p> <p>4 A Yes.</p> <p>5 <b>Q This looks to me like it's an e-mail from</b></p> <p>6 <b>somebody -- with someone named Larry.</b></p> <p>7 A Whoa, whoa, whoa, whoa. I don't read that</p> <p>8 fast.</p> <p>9 <b>Q Oh, well, you don't need to read it. I'm just</b></p> <p>10 <b>trying to figure out -- well, go ahead and read it and</b></p> <p>11 <b>then I'll ask my question.</b></p> <p>12 A Okay. Do you know who that: "Is the new</p> <p>13 center called Grand recovery and addiction center," do</p> <p>14 you know who wrote that?</p> <p>15 <b>Q I'm going to ask you in a second.</b></p> <p>16 A Huh?</p> <p>17 <b>Q I -- I think I do, so just go ahead and read</b></p> <p>18 <b>this, and then I'll -- we can talk about it. Let me</b></p> <p>19 <b>know when you're done.</b></p> <p>20 A Okay.</p> <p>21 <b>Q So this is marked Grand 00134. So this was</b></p> <p>22 <b>produced by Grand. And it says LS. I think it's Larry</b></p> <p>23 <b>Smith. I think that's you.</b></p> <p>24 A That's me.</p> <p>25 <b>Q Okay. What did -- what did you mean here by:</b></p>
<p style="text-align: right;">Page 174</p> <p>1 <b>Q Uh-huh.</b></p> <p>2 A Let me -- I'm thinking about this.</p> <p>3 <b>Q Sure.</b></p> <p>4 A I turned in one phone.</p> <p>5 <b>Q Uh-huh.</b></p> <p>6 A And they were supposed to deleted everything on</p> <p>7 it --</p> <p>8 <b>Q Uh-huh.</b></p> <p>9 A -- and give me a new phone.</p> <p>10 <b>Q Uh-huh.</b></p> <p>11 A And they did, but they didn't delete everything</p> <p>12 on that phone.</p> <p>13 <b>Q Okay. When was that?</b></p> <p>14 A I don't know. I don't have a date.</p> <p>15 <b>Q Was that within the last two years?</b></p> <p>16 A Yes.</p> <p>17 <b>Q And was that the 4820 number? Was that the --</b></p> <p>18 A No, the 402 (sic) number is a number and a</p> <p>19 phone that I bought after I left Grand, because they</p> <p>20 were furnishing that phone to that point, and it had</p> <p>21 both those numbers on that one phone.</p> <p>22 <b>Q Okay. So you were using the number 4820 before</b></p> <p>23 <b>you left Grand?</b></p> <p>24 A Yes.</p> <p>25 (Exhibit 1 marked for identification.)</p>	<p style="text-align: right;">Page 176</p> <p>1 <b>"I think politically she would have no problems at this</b></p> <p>2 <b>point?"</b></p> <p>3 A You know, I don't even know. I couldn't even</p> <p>4 tell you. When was this written? May of '22? Man, I</p> <p>5 type all the time.</p> <p>6 <b>Q Do you have any idea why you would have told</b></p> <p>7 <b>her this would be a perfect time for her to put the RFP</b></p> <p>8 <b>out?</b></p> <p>9 A I have no idea.</p> <p>10 <b>Q Did you often give Carrie advice about actions</b></p> <p>11 <b>for the DMH to take?</b></p> <p>12 A Do what?</p> <p>13 <b>Q Did you regularly give Carrie advice on what</b></p> <p>14 <b>actions DMH should take?</b></p> <p>15 MR. RATCLIFF: Object to --</p> <p>16 THE WITNESS: No.</p> <p>17 MR. RATCLIFF: -- the form.</p> <p>18 <b>Q (By Ms. Velandia) And I --</b></p> <p>19 MR. RATCLIFF: He answered.</p> <p>20 <b>Q (By Ms. Velandia) -- think his answer was no;</b></p> <p>21 <b>right? You said no?</b></p> <p>22 A I said no.</p> <p>23 (Exhibit 2 marked for identification.)</p> <p>24 <b>Q (By Ms. Velandia) Before you start reading, I'm</b></p> <p>25 <b>just going to say this is marked as Exhibit 2, and it is</b></p>

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1 **Grand -- I can't see that -- 00128 and 00114. And this**  
 2 **says from LS too, and I think this is from you too; is**  
 3 **that correct?**  
 4 A This is when we were looking for an engineer  
 5 to -- for our building. It's required because the size  
 6 of our boiler, and the State of Oklahoma you have to  
 7 have somebody there anytime -- in your regular hours.  
 8 **Q Okay. Okay.**  
 9 A That's what that first one is.  
 10 **Q So this text is from you, this gray -- this**  
 11 **gray text?**  
 12 A Yes, I would say.  
 13 **Q Okay. Now read this other text down here.**  
 14 **This is the one I have questions about.**  
 15 A Okay.  
 16 **Q And -- and I think this text is from you too;**  
 17 **is that correct?**  
 18 A I think the blue text is from me. Well, I'm  
 19 not sure. I obviously got something from Leah talking  
 20 about the boiler and a engineer that would possibly go  
 21 to work for us.  
 22 **Q So this gray text is from you, so this gray**  
 23 **text below appears to be from you too?**  
 24 A When was this written?  
 25 **Q It says January 9, 2023.**

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1 A Okay. I don't remember why I said it or what I  
 2 said in it.  
 3 **Q But do you -- you don't dispute that this is a**  
 4 **text that you sent to somebody?**  
 5 A Yeah, I probably sent that to Josh.  
 6 **Q And do you know what problem you're talking**  
 7 **about here? Does that, "We think we can help with this**  
 8 **problem," do you know what problem you were talking**  
 9 **about in May -- or January, 2023?**  
 10 A It seems like there was a death in north Tulsa.  
 11 Police went in and shot somebody, I believe, and I was  
 12 just letting her know that I think that we could help  
 13 with the Oklahoma model.  
 14 **Q What's the Oklahoma model?**  
 15 A I -- the Oklahoma model is basically the iPads  
 16 and being available 24/7 and having a crisis center  
 17 that's open 24/7, an outreach to homeless population  
 18 24/7. Unbridled access is, I believe, the Oklahoma  
 19 model.  
 20 **Q Is that the model that Grand had in place in**  
 21 **the counties other than Tulsa County?**  
 22 A Ask --  
 23 **Q Is that -- is that -- all that what you just**  
 24 **described, is that what Grand had in place in counties**  
 25 **other than Tulsa County?**

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1 A Yeah, in our 12 counties, we basically had that  
 2 in place.  
 3 **Q 24 hour...**  
 4 A Urgent care, 24 hour -- we weren't doing 24  
 5 hour outreach to the homeless, because most of your  
 6 homeless population is in your bigger cities where they  
 7 can disappear. If you -- in Oklahoma, you know,  
 8 somebody's homeless, somebody does something about it  
 9 and gets them a home. But -- so all of those things,  
 10 except the 24/7 outreach, we were doing the rest of  
 11 them.  
 12 (Exhibit 3 marked for identification.)  
 13 **Q (By Ms. Velandia) I'm marking this Exhibit 3.**  
 14 **It's Grand 01127. Can you read -- is that too small?**  
 15 A Yes, this would be to Josh and him. And can  
 16 you enlarge that?  
 17 **Q Yeah.**  
 18 A Yeah, Josh is in the green here.  
 19 **Q And is that you in the gray?**  
 20 A Yes.  
 21 **Q And it looks like August 15th, 2022; correct?**  
 22 A Okay. Now we're talking about construction  
 23 that a company was going to do for us at 12&12.  
 24 **Q Okay.**  
 25 A Or the old 12&12.

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1 **Q Okay. I'm -- I'm more interested in this last**  
 2 **text, so let me know when you've read that.**  
 3 A Okay.  
 4 **Q So what did you mean by, "We are risking a lot**  
 5 **of work, money and time. Hoping that we are the best**  
 6 **candidate for the RFP?"**  
 7 A We were billing under Chapter 23 fee for  
 8 service as a private provider, and we were in the  
 9 schools, we were in -- working with the Salvation Army  
 10 and some other places about how we could help them.  
 11 **Q And you were doing all that hoping that you**  
 12 **were the best candidate for the RFP?**  
 13 A Yeah, sure. We were always hoping we were the  
 14 best candidate for the RFP. Why would you not? You're  
 15 turning one in.  
 16 **Q So how were you risking a lot of work and**  
 17 **money? Were you not making as much money --**  
 18 A On a --  
 19 **Q -- before you got the --**  
 20 A On a fee for service basis, yeah, you get paid  
 21 for what you do with a client. And our CCBHC rate in  
 22 our other 12 counties was per member per month. So we  
 23 were getting paid a lot more for our consumers in our 12  
 24 counties.  
 25 (Exhibit 4 marked for identification.)

<p style="text-align: right;">Page 181</p> <p>1 <b>Q (By Ms. Velandia) So this is what I've marked</b>  2 <b>as Exhibit 4 and it's Grand 00093. Go ahead and read</b>  3 <b>that and let me know when you have read it.</b>  4 A So what are you asking me?  5 <b>Q Well, read it first. Have you had a chance to</b>  6 <b>read it?</b>  7 A I read the first paragraph.  8 <b>Q Do you know who -- it looks like JH. Do -- do</b>  9 <b>you know if that's Jeff Harlin?</b>  10 A Could be.  11 <b>Q Do you know if this was -- these were text</b>  12 <b>messages sent by you to Jeff or by someone else?</b>  13 A Okay.  14 <b>Q Do you know --</b>  15 A What's your question?  16 <b>Q -- was this a communication between you and</b>  17 <b>Jeff Harlin?</b>  18 A I believe so.  19 <b>Q And what did you mean -- well, what did Jeff --</b>  20 <b>do you know what Jeff meant by saying, "I'm assuming</b>  21 <b>Carrie is aware of the good news in Tulsa?"</b>  22 A What are you asking me?  23 <b>Q What did -- do you know what Jeff meant by the</b>  24 <b>good news in Tulsa when he said that?</b>  25 A You'd have to ask Jeff what he meant.</p>	<p style="text-align: right;">Page 183</p> <p>1 A Two weeks would have been toward the end of  2 February? Okay. That -- I don't have a clue. That was  3 written by Josh Cantwell.  4 <b>Q Did Josh ever tell you --</b>  5 A I did -- I didn't -- I did not respond to it if  6 he sent it to me. What's your question?  7 <b>Q Yeah, did Josh ever tell you that he had</b>  8 <b>trusted information that the RFP was going to be</b>  9 <b>released?</b>  10 A No.  11 <b>Q He wouldn't tell you that as the CEO of the</b>  12 <b>company?</b>  13 A Josh had a bad habit of not keeping me informed  14 of everything that was going on.  15 <b>Q Would you be concerned that he was receiving</b>  16 <b>information about when the RFP was being released?</b>  17 MR. RATCLIFF: Object to the form.  18 THE WITNESS: I wouldn't know where he got that  19 information. Could have been from Gail Lapidus, as far  20 as I know.  21 (Exhibit 6 marked for identification.)  22 <b>Q (By Ms. Velandia) I'm going to put Exhibit 6,</b>  23 <b>which is Grand 00155.</b>  24 A Elaine Clugston?  25 <b>Q Is this a text between you and Elaine Clugston?</b></p>
<p style="text-align: right;">Page 182</p> <p>1 <b>Q Well, you said here, "Yes, she is. Pretty</b>  2 <b>awesome." So at some point you must have known what the</b>  3 <b>good news was?</b>  4 A I think what here we were talking about is the  5 two candidates that were being interviewed for Family &amp;  6 Children's Services, and the rumor was that a decision  7 was going to be made in December. So what is your  8 question?  9 <b>Q What was the good news?</b>  10 A I don't have a clue.  11 (Exhibit 5 marked for identification.)  12 <b>Q (By Ms. Velandia) I'm going to put up here what</b>  13 <b>I have marked as Exhibit 5. This is Grand 01018. Go</b>  14 <b>ahead and read that and let me know when you're done.</b>  15 A This is from Josh Cantwell?  16 <b>Q Yes.</b>  17 A To -- who's this to? Joanne McNamara. Joanne  18 McNamara must be with CohnReznick. Well, obviously they  19 were wrong.  20 <b>Q You mean they were wrong that the RFP was going</b>  21 <b>to be released?</b>  22 A Yeah. This was written in what month?  23 7/11/23. Two weeks would have been 1st of August;  24 right?  25 <b>Q That's February 13th, 2023; right?</b></p>	<p style="text-align: right;">Page 184</p> <p>1 A Okay. So I'm in the blue, I'm assuming here,  2 if this was sent to me.  3 <b>Q I don't know. This is all I have.</b>  4 A Yeah.  5 <b>Q Do you know if this was sent to you?</b>  6 A What's your question?  7 <b>Q Do you think this was sent to you?</b>  8 A Could have been.  9 <b>Q You're not sure?</b>  10 A Well, it says EC up there, and I don't know who  11 she was corresponding with.  12 <b>Q So you don't know if this was a communication</b>  13 <b>between you and Elaine Clugston?</b>  14 A I don't know what?  15 <b>Q You don't know whether this is a communication</b>  16 <b>between you and Elaine Clugston?</b>  17 A I'm not 100 percent sure, but it wouldn't  18 surprise me.  19 <b>Q So it says here, "I will be totally surprised</b>  20 <b>if we are not awarded this RFP?"</b>  21 A I would be. We did a good RFP, and we did a  22 damn good job at it. I would be totally surprised if we  23 didn't get it.  24 <b>Q What do you think was so good about your RFP?</b>  25 A Do what?</p>

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1 **Q What do you think was so good about your RFP?**

2 A What do I think it says about --

3 **Q What did you think was so good about the Grand**

4 **RFP specifically?**

5 A I didn't write it.

6 **Q So why do you say you think it was really good?**

7 A Because we hired good experts to help us with

8 it, and I got a good executive team, and Josh -- Josh

9 Cantwell is a good thinker.

10 **Q Anything else?**

11 A No.

12 **Q Just because of who wrote it? You don't think**

13 **it was because of the content of it at all?**

14 A So I -- what's the open.spotify.com; do you

15 know?

16 **Q No.**

17 A Neither do I. But it has to be a public record

18 of some sort.

19 **Q I don't know.**

20 A So Elaine is basically saying that -- she's in

21 the blue; right?

22 **Q Usually when -- the person at the top is in the**

23 **gray, so it's my understanding that she would be --**

24 A Okay.

25 **Q -- in the gray.**

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1 A Elaine Clugston is in the gray?

2 **Q That's my understanding. I don't know. Tell**

3 **me if you think that's wrong.**

4 A I would say that would be something Elaine

5 would probably say. And that was when? Was that

6 August 6th at 10:37 a.m.? And then the next one looks

7 like it starts September. So if you go back up to the

8 top and see a date --

9 **Q Yeah, I -- I didn't get the top so I didn't get**

10 **the date. That wasn't provided to us. It says, "Our**

11 **RFP was sent this morning," so I think this must have**

12 **been --**

13 A Okay. I -- I -- I don't totally recall this

14 conversation, but I kind of do.

15 **Q Okay. So --**

16 A Elaine, for some reason, thought the Department

17 of Mental Health had put a lot of money in bridging us

18 to this point, and she's absolutely wrong but -- and you

19 notice I didn't even respond to that. I didn't know how

20 to respond to that. She's a board member. You would

21 have to ask Elaine what she meant by that.

22 **Q So she's not an employee of Grand? She's a**

23 **board member?**

24 A Elaine Clugston is either vice chair or

25 secretary-treasurer of the board.

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1 **Q Did you say anything to her --**

2 A She lives in Miami, Oklahoma.

3 **Q Did you say anything to her to say, they**

4 **haven't bridged us?**

5 A Huh?

6 **Q Never mind. So going back to when you said**

7 **you'll be totally surprised if we're not awarded this**

8 **RFP, you said, because you had really good writers and**

9 **because you engaged experts, who are the experts that**

10 **have been engaged by Grand to help with the RFP?**

11 A Was that Cohn -- whatever how you say it.

12 **Q CohnReznick?**

13 A Yes, CohnReznick.

14 **Q Anyone else?**

15 A No, I don't think so.

16 **Q And was -- other than the writers and the**

17 **experts, was there anything about Grand that made you**

18 **think -- that made you feel that you would be totally**

19 **surprised if you did not get the RFP?**

20 A Sure.

21 **Q What?**

22 A We're damn good.

23 **Q Well, give me specifics.**

24 A We reduced inpatient by 93 percent, and

25 inpatient seemed to be a problem in Tulsa, but I'm not

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1 sure it was. We put iPads in all the police cars so

2 they could contact us 24/7 instead of arresting clients

3 or arresting people that are mentally ill because it's

4 easier to arrest them than it is to bring them to our

5 clinic. And so all those things are important in this

6 business.

7 **Q Anything else? I just want to make sure I get**

8 **everything.**

9 A I think that's plenty.

10 **Q Do consumers of Grand get gift cards when they**

11 **finish treatment?**

12 A Have to ask Josh that. I don't know. There

13 is -- no, I don't know.

14 (Exhibit 7 marked for identification.)

15 **Q (By Ms. Velandia) I marked this Exhibit 7.**

16 **This is Grand 00104.**

17 A Do what? Oh, you're saying what's next.

18 **Q Can you read that?**

19 A Yeah. Okay.

20 **Q This looks like a text communication between**

21 **you and someone else. Do you know who this**

22 **communication was with?**

23 A It says this is what I -- what I sent Carrie,

24 which was the podcast itself that Mike Brose did with me

25 and Josh Cantwell.

<p style="text-align: right;">Page 189</p> <p>1 <b>Q So you think this was a --</b></p> <p>2 A Talking about -- talking about who -- who we</p> <p>3 are and what we do.</p> <p>4 <b>Q When was that podcast?</b></p> <p>5 A I have -- that's so long --</p> <p>6 <b>Q That was -- oh, sorry, that was a podcast with</b></p> <p>7 <b>you and Josh Cantwell?</b></p> <p>8 A Yes.</p> <p>9 <b>Q Okay. And so do you think this is a</b></p> <p>10 <b>communication with Josh Cantwell?</b></p> <p>11 A What's your question?</p> <p>12 <b>Q Is this a conversation between you and Josh</b></p> <p>13 <b>Cantwell?</b></p> <p>14 A I think so.</p> <p>15 <b>Q And do you know why he's saying, "Minimize</b></p> <p>16 <b>expenses to the bare necessities until this RFP goes</b></p> <p>17 <b>live?"</b></p> <p>18 A What is your question?</p> <p>19 <b>Q Why was Josh talking about minimizing expenses</b></p> <p>20 <b>in relation to the RFP?</b></p> <p>21 A Because we were billing on a fee for service --</p> <p>22 when was this sent? Let me make sure I know when this</p> <p>23 was sent. August the 7th, but it doesn't tell you what</p> <p>24 year; does it?</p> <p>25 <b>Q I don't think I have that, but did you do the</b></p>	<p style="text-align: right;">Page 191</p> <p>1 And I -- I don't think that way. But she was trying to</p> <p>2 stop this RFP from coming out. She was the one</p> <p>3 interfering in the RFP, because she was trying to get it</p> <p>4 stopped before it even came out, I believe. When did</p> <p>5 that come out? September the 27th, 2023. Was the RFP</p> <p>6 released by then? I don't know.</p> <p>7 <b>Q Who did you hear that from?</b></p> <p>8 A It was pretty well known in Tulsa.</p> <p>9 <b>Q But do you remember anybody specifically --</b></p> <p>10 A I said rumors, so I can't tell you exactly who</p> <p>11 I heard it from, but that's my belief that's what she</p> <p>12 was doing. And there was some talk around Tulsa that</p> <p>13 she didn't want this RFP to happen, she wanted to be the</p> <p>14 only CCBHC in Tulsa, along with CRS, because then even</p> <p>15 though she wasn't providing the services as needed in</p> <p>16 the community, she still wanted to be the only person</p> <p>17 here in Tulsa.</p> <p>18 <b>Q Did anybody from DMH state anything to you that</b></p> <p>19 <b>made you think that --</b></p> <p>20 A No.</p> <p>21 <b>Q -- the RFP was on hold because of what she was</b></p> <p>22 <b>doing?</b></p> <p>23 A No.</p> <p>24 <b>Q Did anybody from DMH tell you that she was</b></p> <p>25 <b>acting in the way that you just described?</b></p>
<p style="text-align: right;">Page 190</p> <p>1 <b>podcast in 2023?</b></p> <p>2 A Okay. I -- I think we did that podcast in 2022</p> <p>3 maybe. Maybe after that. I can't remember.</p> <p>4 <b>Q So why was Josh talking about minimizing</b></p> <p>5 <b>expenses in relation to the RFP?</b></p> <p>6 A Because we were billing on a fee for service</p> <p>7 basis, and we were struggling to make ends meet with the</p> <p>8 number of staff and the buildings and everything else</p> <p>9 that we had there.</p> <p>10 (Exhibit 8 marked for identification.)</p> <p>11 <b>Q (By Ms. Velandia) I'm putting on the screen</b></p> <p>12 <b>what I marked as Exhibit 8, and this is Grand 00278.</b></p> <p>13 A This is from Josh Cantwell.</p> <p>14 <b>Q Yes. It appears to be, yes.</b></p> <p>15 A Him and jpg. I don't have a clue what that is.</p> <p>16 Okay. What's your question?</p> <p>17 <b>Q So in this e-mail from you to Josh and Leah</b></p> <p>18 <b>Harrell, it says, "I think the word might be spreading</b></p> <p>19 <b>the RFP has been put on hold because of what Gail is</b></p> <p>20 <b>doing." What were you referring to when you say what</b></p> <p>21 <b>Gail was doing?</b></p> <p>22 A It was rumored -- did not witness personally --</p> <p>23 that she was trying to stop the RFP from coming out.</p> <p>24 Gail -- Gail believes Tulsa belongs to her and she</p> <p>25 believes the clients belong to her, in my opinion; okay?</p>	<p style="text-align: right;">Page 192</p> <p>1 A No. What -- what's on that next one from Leah?</p> <p>2 Okay.</p> <p>3 <b>Q So what do you specifically allege that Gail</b></p> <p>4 <b>did to try to stop the RFP?</b></p> <p>5 A I'm sorry?</p> <p>6 <b>Q What -- what do you -- what is it you're</b></p> <p>7 <b>alleging that Gail did specifically to try to stop the</b></p> <p>8 <b>RFP?</b></p> <p>9 A It was rumors.</p> <p>10 <b>Q So -- but do you have any facts?</b></p> <p>11 A No.</p> <p>12 <b>Q You don't have any evidence that she ever did</b></p> <p>13 <b>anything?</b></p> <p>14 A No. She could have not done anything. It's</p> <p>15 just the rumors in Tulsa.</p> <p>16 <b>Q So you never witnessed her do any of the things</b></p> <p>17 <b>you just described?</b></p> <p>18 A I never was around Gail.</p> <p>19 <b>Q So you never witnessed her --</b></p> <p>20 A I stayed my distance from her.</p> <p>21 <b>Q So you don't have any direct knowledge of what</b></p> <p>22 <b>you just stated about Gail?</b></p> <p>23 A No.</p> <p>24 <b>Q Who were you around that would have given you</b></p> <p>25 <b>this -- these rumors?</b></p>

<p style="text-align: right;">Page 193</p> <p>1 A We were -- what month was this? September? We</p> <p>2 were working with Dr. Johnson a lot with the school</p> <p>3 system, but I'm not sure she said that; okay? I don't</p> <p>4 know.</p> <p>5 <b>Q Anyone else?</b></p> <p>6 A No.</p> <p>7 <b>Q Who else were you talking to in Tulsa about the</b></p> <p>8 <b>RFP around that time?</b></p> <p>9 A Who was I talking to?</p> <p>10 <b>Q Uh-huh. I mean, you say there were rumors.</b></p> <p>11 <b>The only person you remember hearing a rumor from --</b></p> <p>12 A To Leah Harrell, Josh Cantwell.</p> <p>13 <b>Q That wasn't my question. Who were you talking</b></p> <p>14 <b>to about these rumors about Gail?</b></p> <p>15 A People were talking to me about the rumors</p> <p>16 about Gail.</p> <p>17 <b>Q What people?</b></p> <p>18 A Jeff Harlin probably. Some of her staff was</p> <p>19 talking to Jeff.</p> <p>20 <b>Q Which ones? Who?</b></p> <p>21 A Huh?</p> <p>22 <b>Q Who?</b></p> <p>23 A I don't know the name.</p> <p>24 <b>Q And how do you know that that staff was talking</b></p> <p>25 <b>to Jeff?</b></p>	<p style="text-align: right;">Page 195</p> <p>1 A Probably Gail.</p> <p>2 <b>Q Gail would know who was spreading rumors about</b></p> <p>3 <b>her?</b></p> <p>4 A Yeah, she would know it. She's well connected</p> <p>5 in Tulsa.</p> <p>6 (Exhibit 9 marked for identification.)</p> <p>7 <b>Q (By Ms. Velandia) I think this is Exhibit 9,</b></p> <p>8 <b>Grand 00061.</b></p> <p>9 A Becky Frank.</p> <p>10 <b>Q With Schnake Turnbo?</b></p> <p>11 A Yes.</p> <p>12 <b>Q Is this a text between you and Becky?</b></p> <p>13 A I don't know, but it -- it didn't -- it didn't</p> <p>14 happen, so if I -- if I said Monday, it was false rumor,</p> <p>15 because it didn't happen until December 1, and that was</p> <p>16 in October.</p> <p>17 <b>Q But was this a text between you and Becky</b></p> <p>18 <b>Frank?</b></p> <p>19 A Looks like it.</p> <p>20 <b>Q Who would you have heard -- who would you have</b></p> <p>21 <b>heard from that it was going to be released Monday? Or</b></p> <p>22 <b>who -- who did you hear from in October 20th that the</b></p> <p>23 <b>RFP was going to be released the following Monday?</b></p> <p>24 A I -- I don't know who I heard from them. I</p> <p>25 think that -- best of my recall, it would have been Jeff</p>
<p style="text-align: right;">Page 194</p> <p>1 A It seems like Jeff -- no, Josh. Jeff is not in</p> <p>2 here.</p> <p>3 <b>Q What's that?</b></p> <p>4 A Jeff Harlin is not in this e-mail. It would</p> <p>5 have had to been Josh --</p> <p>6 <b>Q So --</b></p> <p>7 A -- or Leah.</p> <p>8 <b>Q So you would have been telling Josh and Leah</b></p> <p>9 <b>that you heard rumors from Josh or Leah that Gail was</b></p> <p>10 <b>doing something to put the RFP on hold?</b></p> <p>11 A I believe that's true.</p> <p>12 <b>Q Does that make any sense?</b></p> <p>13 A Yes. Leah was her administrative assistant,</p> <p>14 and she treated her like a piece of crap, and Leah was</p> <p>15 pissed off about it and she could be saying anything.</p> <p>16 <b>Q When did Leah join Grand?</b></p> <p>17 A I have no clue.</p> <p>18 <b>Q Is there anyone else you were talking to about</b></p> <p>19 <b>rumors in Tulsa County about Gail --</b></p> <p>20 A Not that I recall.</p> <p>21 <b>Q -- and the RFP? Who would I need to go to to</b></p> <p>22 <b>find out --</b></p> <p>23 A Do what?</p> <p>24 <b>Q Who would I need to go to to find out the</b></p> <p>25 <b>source of those rumors?</b></p>	<p style="text-align: right;">Page 196</p> <p>1 Harlin, and the rumor came out of Family &amp; Children's</p> <p>2 Services, one of those staff, and so you can ask him who</p> <p>3 that staff member is and I'm sure he'll know.</p> <p>4 <b>Q No one else was telling you when an RFP would</b></p> <p>5 <b>come out?</b></p> <p>6 A No.</p> <p>7 <b>Q Why would FCS know?</b></p> <p>8 A What?</p> <p>9 <b>Q Why do you think FCS would know when the RFP</b></p> <p>10 <b>would come out?</b></p> <p>11 A I don't -- so she says, "Sooooo....CCBHC?"</p> <p>12 <b>Q No, but you just said that Jeff got information</b></p> <p>13 <b>from FCS. How do you know that Jeff was getting</b></p> <p>14 <b>information from FCS about the date the RFP was</b></p> <p>15 <b>released?</b></p> <p>16 A Sorry?</p> <p>17 <b>Q You just said that Jeff got information from</b></p> <p>18 <b>FCS about when the RFP was released?</b></p> <p>19 A Not FCS. I said got information from Family &amp;</p> <p>20 Children's Services. One of their employees.</p> <p>21 <b>Q When I'm talking about FCS, I'm talking about</b></p> <p>22 <b>Family &amp; Children's Services; right?</b></p> <p>23 A Okay. I thought you were talking Schnake</p> <p>24 Turnbo Frank.</p> <p>25 <b>Q No FCS. FCS, yeah.</b></p>

<p style="text-align: right;">Page 197</p> <p>1 A So what is your question?</p> <p>2 <b>Q What -- what makes you think that Jeff was</b></p> <p>3 <b>getting information about the timing of the award of the</b></p> <p>4 <b>RFP from Family &amp; Children's Services staff?</b></p> <p>5 A I can't tell you that, but more than likely he</p> <p>6 told me that.</p> <p>7 <b>Q But you don't remember? You don't have any</b></p> <p>8 <b>specific recollection --</b></p> <p>9 A No.</p> <p>10 <b>Q -- of him telling you that?</b></p> <p>11 A No. Is there anything below that?</p> <p>12 (Exhibit 10 marked for identification.)</p> <p>13 <b>Q (By Ms. Velandia) No. So that was</b></p> <p>14 <b>December 20th. The next exhibit is marked Exhibit --</b></p> <p>15 A That was on a Friday, October the 20th; right?</p> <p>16 <b>Q Yeah. So I'm marking this next exhibit</b></p> <p>17 <b>Exhibit 10. It's Grand 00077, and it also says</b></p> <p>18 <b>October 23rd at the top.</b></p> <p>19 A This is Becky Frank again?</p> <p>20 <b>Q It appears to be. Is that your understanding?</b></p> <p>21 A So I'm in the green?</p> <p>22 <b>Q I'm not sure. Do you think this was a</b></p> <p>23 <b>communication between you and Becky Frank?</b></p> <p>24 A That's what it appears to be.</p> <p>25 <b>Q When it refers to a phone call with Carrie,</b></p>	<p style="text-align: right;">Page 199</p> <p>1 <b>sent on October 23rd, 2023, based on the texts that we</b></p> <p>2 <b>just reviewed?</b></p> <p>3 A I don't know for sure, but that's a big -- big</p> <p>4 leap.</p> <p>5 <b>Q What's that?</b></p> <p>6 A That's a big leap.</p> <p>7 <b>Q Now, are these texts between you and Becky</b></p> <p>8 <b>Frank?</b></p> <p>9 A Not -- no year or date, just time; right? Can</p> <p>10 you tell me what year these --</p> <p>11 <b>Q No, I --</b></p> <p>12 A -- e-mails come from?</p> <p>13 <b>Q -- don't. Grand Mental Health provided this to</b></p> <p>14 <b>me without a year on it, so I'm asking you.</b></p> <p>15 A Well, we provided everything we had.</p> <p>16 <b>Q Well, they didn't provide the date for this</b></p> <p>17 <b>text, the year --</b></p> <p>18 MR. RATCLIFF: Can we --</p> <p>19 <b>Q (By Ms. Velandia) -- so I'm asking you.</b></p> <p>20 MR. RATCLIFF: -- take a break?</p> <p>21 MS. VELANDIA: Yeah.</p> <p>22 THE VIDEOGRAPHER: Off the record at 3:44.</p> <p>23 (Recess taken from 3:44 p.m. to 3:52 p.m.)</p> <p>24 THE VIDEOGRAPHER: Back on the record at</p> <p>25 3:52 p.m.</p>
<p style="text-align: right;">Page 198</p> <p>1 <b>would that be Carrie Slatton-Hodges?</b></p> <p>2 A Yeah.</p> <p>3 <b>Q Would anybody else be talking with Carrie</b></p> <p>4 <b>Slatton-Hodges from Grand besides you?</b></p> <p>5 A Josh maybe.</p> <p>6 <b>Q So do you think this is a communication between</b></p> <p>7 <b>you and Becky Frank?</b></p> <p>8 A What year is it?</p> <p>9 <b>Q I believe it's 2023, because this is the Monday</b></p> <p>10 <b>after October 20th. Does that seem accurate?</b></p> <p>11 A What makes you think it was that year?</p> <p>12 <b>Q Because the previous text that we looked at was</b></p> <p>13 <b>dated October 20th, and it said we would know about the</b></p> <p>14 <b>RFP on Monday.</b></p> <p>15 A So that means that we would have known about</p> <p>16 the RFP on October the -- that it would -- somebody was</p> <p>17 expecting it to be released, and, again, we were wrong</p> <p>18 several, several times about when we thought it was</p> <p>19 going to be released.</p> <p>20 <b>Q So does it appear to you that this text --</b></p> <p>21 A Huh?</p> <p>22 <b>Q -- these texts -- does it appear to you that</b></p> <p>23 <b>these texts were sent on October 23rd, 2023?</b></p> <p>24 A What are you asking me?</p> <p>25 <b>Q Does it appear to you that these texts were</b></p>	<p style="text-align: right;">Page 200</p> <p>1 <b>Q (By Ms. Velandia) So do you have any reason to</b></p> <p>2 <b>dispute that this text chain was sent in October 23rd,</b></p> <p>3 <b>2023?</b></p> <p>4 A What I'm disputing is I don't believe that text</p> <p>5 was from Becky Frank to me. If I was on the phone with</p> <p>6 Carrie Slatton-Hodges still and if it was me on the</p> <p>7 phone, if Josh was on the phone, then I would say</p> <p>8 something like, he's still on the phone, but I don't --</p> <p>9 I don't remember any of this text.</p> <p>10 <b>Q Do you remember Josh talking to Carrie</b></p> <p>11 <b>Slatton-Hodges?</b></p> <p>12 A Do what?</p> <p>13 <b>Q Do you remember Josh talking to Carrie</b></p> <p>14 <b>Slatton-Hodges in October of 2023?</b></p> <p>15 A He wouldn't have told me about it necessarily.</p> <p>16 <b>Q Did he regularly talk to Carrie Slatton-Hodges?</b></p> <p>17 A Huh?</p> <p>18 <b>Q Did he regularly talk to Carrie Slatton-Hodges?</b></p> <p>19 A I don't think so. Very rarely.</p> <p>20 <b>Q But you don't know? Oh, he --</b></p> <p>21 A I don't know.</p> <p>22 <b>Q He spoke to her rarely?</b></p> <p>23 A What?</p> <p>24 <b>Q He spoke to her occasionally? You don't know</b></p> <p>25 <b>whether he ever spoke to her?</b></p>

<p style="text-align: right;">Page 201</p> <p>1 A I don't. All I'm saying is that somebody is 2 saying they're still on the phone. I don't know who 3 they would be unless it's Josh and Carrie talking or me 4 and Carrie talking. 5 <b>Q Do you --</b> 6 A And I don't remember any of this text. 7 <b>Q Do you remember having a phone call with Carrie</b> 8 <b>around October, 2023, of --</b> 9 A Could have been about anything, though. We -- 10 you know, Carrie was the commissioner of the Department 11 of Mental Health. She was always having directors 12 meetings, there was a lot going on at Grand Mental 13 Health at -- during this period of time. I could have 14 been talking to her about anything. 15 <b>Q Do you have any reason to dispute that you were</b> 16 <b>talking to her about the RFP?</b> 17 A Do what? 18 <b>Q Do you have any basis for disputing that you</b> 19 <b>were talking about Carrie -- you were talking with</b> 20 <b>Carrie about the RFP --</b> 21 MR. RATCLIFF: Object to form. 22 <b>Q (By Ms. Velandia) -- on the date of these</b> 23 <b>texts?</b> 24 A I don't know. 25 <b>Q You don't know if you have any basis --</b></p>	<p style="text-align: right;">Page 203</p> <p>1 all the time. I can't tell you what percent of the 2 time. But Carrie -- if she didn't want to answer a 3 question, she just did not respond, period. Never. 4 <b>Q So it looks like you're telling somebody this</b> 5 <b>is what -- it looks like you've pasted what Carrie has</b> 6 <b>said to you into this text; is that --</b> 7 A Yeah -- 8 <b>Q -- correct?</b> 9 A -- I would say, "the provider cert establishes 10 your clinics that (sic) meet cert requirements." We 11 were certified in Skyline II, so I think the first part 12 of it doesn't matter, because it's -- the second thing, 13 a provider certification establish your clinics that 14 meet certified requirements, and it -- it did meet it, 15 it was certified. 16 <b>Q But -- but this is a text that Carrie sent to</b> 17 <b>you, this, "FYI, you can't start billing CCBHC services</b> 18 <b>until, 1, I redraw the catchment areas and assign yours,</b> 19 <b>and, 2, provider cert establishes your clinics there</b> 20 <b>meet cert requirements?"</b> 21 A What -- what's your question? 22 <b>Q Is -- is that a copy of a text that Carrie sent</b> 23 <b>you?</b> 24 A I assume it is. 25 <b>Q Or it could have been an e-mail?</b></p>
<p style="text-align: right;">Page 202</p> <p>1 A I've given you -- 2 <b>Q -- to dispute that?</b> 3 A -- the best answer I know how to give you. 4 <b>Q So you don't know -- it's -- it's possible you</b> 5 <b>could have been talking to her about the RFP on this</b> 6 <b>date?</b> 7 A No. 8 <b>Q Why is it not possible?</b> 9 A Because it hadn't come out yet or it wasn't let 10 yet. One of the two. And I did not know it was coming 11 out. So I don't know who that text is between. 12 (Exhibit 11 marked for identification.) 13 <b>Q (By Ms. Velandia) I'm marking this Exhibit 11.</b> 14 <b>It's Grand 00089. Sorry. Can you read that?</b> 15 A Blow it up a little bit more if you could. 16 Okay. 17 <b>Q That's the top. Is this a text between you</b> 18 <b>and -- well, is this a text that you sent to somebody?</b> 19 A More than likely. 20 <b>Q Do you know who you were sending this text to?</b> 21 A No. 22 <b>Q When you communicated with Carrie in writing,</b> 23 <b>was it via e-mail or via text message? I'm talking</b> 24 <b>about Carrie Slatton-Hodges.</b> 25 A With Carrie, it was usually an e-mail, but not</p>	<p style="text-align: right;">Page 204</p> <p>1 A Could have been. I don't know. How do you 2 tell the difference between an e-mail and a text? 3 <b>Q It's hard if you don't have the original;</b> 4 <b>right?</b> 5 A Huh? 6 <b>Q It's hard if you don't have the original text</b> 7 <b>or the e-mail; correct?</b> 8 A Right. Usually on an e-mail, it says who it's 9 to and from. 10 <b>Q Uh-huh.</b> 11 A And I didn't see that. 12 (Exhibit 12 marked for identification.) 13 <b>Q (By Ms. Velandia) So you think that was a text?</b> 14 <b>It's okay if you don't. It -- it was one way or the</b> 15 <b>other.</b> 16 <b>Okay. I'm going to mark this as Exhibit 12,</b> 17 <b>Grand 00171.</b> 18 A You'll have to blow that up. 19 <b>Q Okay.</b> 20 A So this was before the announcement was made, 21 looks like to me. 22 <b>Q Is this a text between -- looks like this is a</b> 23 <b>text between somebody and Carrie Slatton-Hodges;</b> 24 <b>correct? And I can go down --</b> 25 A It doesn't say anything about the RFP.</p>

<p style="text-align: right;">Page 205</p> <p>1 <b>Q It looks like this is a text between someone</b>  2 <b>and Carrie Slatton-Hodges. Was this a text between you</b>  3 <b>and Carrie Slatton-Hodges?</b>  4 A I don't know.  5 <b>Q Do you know of anybody else with the initials</b>  6 <b>CS named Carrie?</b>  7 A Could have been Josh.  8 (Exhibit 13 marked for identification.)  9 <b>Q (By Ms. Velandia) I'm marking this Exhibit 13.</b>  10 A Huh?  11 <b>Q I'm marking this next document Exhibit 13. It</b>  12 <b>doesn't have a Bates stamp, but it's revisions to</b>  13 <b>450:17, dash 1, dash 6. Are you familiar with these</b>  14 <b>proposed revisions to the service area regulations?</b>  15 A When did they come out?  16 <b>Q I believe it was 2023.</b>  17 A I might have read them.  18 <b>Q Do you know why DMH was proposing these</b>  19 <b>changes?</b>  20 A No, I don't.  21 (Exhibit 14 marked for identification.)  22 <b>Q (By Ms. Velandia) Marking this Exhibit 14. Do</b>  23 <b>you know what this is?</b>  24 A This was, I believe, a report that came out  25 from Healthy Minds, looks like to me.</p>	<p style="text-align: right;">Page 207</p> <p>1 A Not that I recall.  2 (Exhibit 15 marked for identification.)  3 <b>Q (By Ms. Velandia) Mark this Exhibit 15. This</b>  4 <b>is Bates stamped SDT DMH 00120.</b>  5 A This is from Carol Ladd. Okay. What's your  6 question?  7 <b>Q Is this address here on 38th Street, is that</b>  8 <b>the Skyline building?</b>  9 A Okay. 2530, I believe, is where Dr. McElwain  10 was officing at, and we wanted to relocate him to our  11 Skyline II.  12 <b>Q So this address here on 6128 East 38th Street,</b>  13 <b>that's Skyline II?</b>  14 A I believe so.  15 (Exhibit 16 marked for identification.)  16 <b>Q (By Ms. Velandia) The next document is marked</b>  17 <b>Exhibit 16, and it's Grand 01015. Who's Alicia Beard?</b>  18 A She is in charge of the PAs and doctors,  19 medical stuff.  20 <b>Q This is -- in January 23rd, 2023, it says she's</b>  21 <b>asking about -- "Attached is what I believe we can do</b>  22 <b>once we become a CCBHC." What -- do you think that's</b>  23 <b>referring to the Tulsa CCBHC?</b>  24 A I'm not sure, but I think so. This is from  25 Jeff Harlin; right?</p>
<p style="text-align: right;">Page 206</p> <p>1 <b>Q Did you receive this report when it came out?</b>  2 A I couldn't tell you.  3 <b>Q Did you ever review any assessment of Tulsa</b>  4 <b>County?</b>  5 A Do what?  6 <b>Q Have you ever reviewed an assessment of Tulsa</b>  7 <b>County performed by Healthy Minds?</b>  8 A Not that I remember. What does the assessment  9 say?  10 <b>Q Well, it's pretty long. I don't think we can</b>  11 <b>read it --</b>  12 A Okay. No, I don't want you to --  13 <b>Q I can get --</b>  14 A -- read it. Thank you.  15 <b>Q In case it refreshes your memory, I --</b>  16 A I shouldn't have asked -- shouldn't have asked  17 that question, I'm sorry.  18 <b>Q I mean, here's a little update on it and</b>  19 <b>findings. Does this help refresh your memory about</b>  20 <b>whether you saw it?</b>  21 A Okay.  22 <b>Q Do you remember ever seeing this report?</b>  23 A No.  24 <b>Q Did anybody ever tell you about a report being</b>  25 <b>issued by Healthy Minds assessing Tulsa?</b></p>	<p style="text-align: right;">Page 208</p> <p>1 <b>Q Right.</b>  2 A So I have no clue why he would write that.  3 You'd have to ask Jeff Harlin.  4 <b>Q What was Grand's gross income in 2022?</b>  5 A Sorry?  6 <b>Q Do you know what Grand makes annually, roughly,</b>  7 <b>from -- in 2022?</b>  8 A We were probably over \$100 million in budget.  9 <b>Q Do you know what this means? Projected of</b>  10 <b>Tulsa OP active clients?</b>  11 A Who's it from?  12 <b>Q I think this is what was attached to that.</b>  13 A Who would be projecting growth would either be  14 Jeff Harlin, Kim Hill or Josh Cantwell.  15 <b>Q What does OP active clients mean?</b>  16 A Where is it at?  17 <b>Q Right here.</b>  18 A Outpatient.  19 <b>Q Okay. Would these be -- then would these be</b>  20 <b>number of CCBHC's clients?</b>  21 A Sorry?  22 <b>Q Do you think this is referring to projected</b>  23 <b>growth in CCBHC clients?</b>  24 A If it was, he missed it by a long ways.  25 <b>Q Why is that?</b></p>

<p style="text-align: right;">Page 209</p> <p>1 A Because.</p> <p>2 <b>Q Is it too high or too low?</b></p> <p>3 A Way too high.</p> <p>4 <b>Q I think I'm done with exhibits for now.</b></p> <p>5 <b>So when did your employment end with Grand</b></p> <p>6 <b>Mental Health?</b></p> <p>7 A Sorry?</p> <p>8 <b>Q When did your employment end with Grand Mental</b></p> <p>9 <b>Health?</b></p> <p>10 A November the 18th.</p> <p>11 <b>Q And why did it end?</b></p> <p>12 A I don't know --</p> <p>13 MR. RATCLIFF: I'm going to object. That's not</p> <p>14 relevant to -- to anything going on here.</p> <p>15 MS. VELANDIA: Sure it is. We want to know</p> <p>16 what was going on.</p> <p>17 THE WITNESS: I don't know what happened. I</p> <p>18 was never told.</p> <p>19 <b>Q (By Ms. Velandia) Who told you that your</b></p> <p>20 <b>employment was being terminated?</b></p> <p>21 A I was in the hospital, just had three -- two</p> <p>22 stents put into my -- the vessels around my heart. Tad</p> <p>23 Jones, Elaine Clugston and Jim Tanner walked into my</p> <p>24 hospital room and told me that -- and this was on</p> <p>25 Tuesday morning, and so they said, last night we decided</p>	<p style="text-align: right;">Page 211</p> <p>1 of his employment. I'm going to instruct him not to</p> <p>2 answer, and if you want to take it up with the Judge, we</p> <p>3 can.</p> <p>4 <b>Q (By Ms. Velandia) When you -- when we started</b></p> <p>5 <b>this deposition, you said you are here on behalf of</b></p> <p>6 <b>Grand. Are you getting paid right now for testifying?</b></p> <p>7 A No.</p> <p>8 <b>Q Are you providing any consulting services to</b></p> <p>9 <b>Grand?</b></p> <p>10 A No.</p> <p>11 <b>Q Why did you say you were here for Grand?</b></p> <p>12 A I guess because I was the CEO at one time, and</p> <p>13 I don't know why else you would be asking me any</p> <p>14 questions if it wasn't for Grand.</p> <p>15 MS. VELANDIA: I'm going to certify that issue</p> <p>16 of the instruction not to respond regarding his</p> <p>17 employment. I just want to state for the record, we</p> <p>18 think it's highly relevant because we think the</p> <p>19 termination might be related to the allegations in this</p> <p>20 RFP, and we're going to bring that up with the Judge.</p> <p>21 MR. RATCLIFF: And I'm going to state for the</p> <p>22 record that one attorney should take this deposition,</p> <p>23 not two. We've sat here all day, and I've watched Elise</p> <p>24 ask questions to you, so -- so next deposition you guys</p> <p>25 pick, because this --</p>
<p style="text-align: right;">Page 210</p> <p>1 to replace you.</p> <p>2 <b>Q And who are those people?</b></p> <p>3 A What?</p> <p>4 <b>Q Who are those individuals?</b></p> <p>5 A They're three board members.</p> <p>6 <b>Q And do you have any suspicion about why your</b></p> <p>7 <b>employment was terminated?</b></p> <p>8 A No, I have no clue.</p> <p>9 <b>Q Have you asked anybody why?</b></p> <p>10 A Yeah, but nobody will answer my questions.</p> <p>11 <b>Q Were you given any corrective actions in the</b></p> <p>12 <b>last three years related to your employment?</b></p> <p>13 A No.</p> <p>14 <b>Q Were you given any warnings that if something</b></p> <p>15 <b>did not happen or --</b></p> <p>16 MR. RATCLIFF: Object. What does that have to</p> <p>17 do with an -- an RFP protest?</p> <p>18 MS. VELANDIA: It has a lot to do with it. We</p> <p>19 want to know if it was related to the RFP.</p> <p>20 MR. RATCLIFF: Objection.</p> <p>21 Larry, you don't need to answer that.</p> <p>22 THE WITNESS: Okay.</p> <p>23 MS. VELANDIA: That's not privileged.</p> <p>24 MR. RATCLIFF: I -- I'm going to object to any</p> <p>25 questions related to his employment or -- or termination</p>	<p style="text-align: right;">Page 212</p> <p>1 MS. VELANDIA: Attorneys work --</p> <p>2 MR. RATCLIFF: -- this is --</p> <p>3 MS. VELANDIA: -- together all the time on a</p> <p>4 deposition.</p> <p>5 MR. RATCLIFF: Attorneys might pass a note or</p> <p>6 two, but Elise is actually asking questions to you and</p> <p>7 you're repeating it on the record. It's -- it's at</p> <p>8 least added an hour --</p> <p>9 MS. VELANDIA: I don't think so.</p> <p>10 MR. RATCLIFF: -- to this -- okay.</p> <p>11 MS. VELANDIA: But your objection is noted.</p> <p>12 Let's go off the record for a minute.</p> <p>13 THE VIDEOGRAPHER: Off the record at 4:11 p.m.</p> <p>14 (Recess taken from 4:11 p.m. to 4:12 p.m.)</p> <p>15 THE VIDEOGRAPHER: Back on the record at 4:12</p> <p>16 p.m.</p> <p>17 MS. VELANDIA: I don't have any questions other</p> <p>18 than what we've asked for direct right now, but I want</p> <p>19 to keep the deposition opening pending the ALJ's ruling</p> <p>20 on the issue of Mr. Smith being instructed not to</p> <p>21 answer, and I also want to point out that Grand has two</p> <p>22 attorneys here present.</p> <p>23 MR. RATCLIFF: And I point out only one</p> <p>24 attorney has voiced any objections today.</p> <p>25 MR. DEMURO: I don't have any questions.</p>

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1 MR. RATCLIFF: Read and sign. Thank you.  
 2 THE VIDEOGRAPHER: We're now off the videotape  
 3 record. The time is 4:13 p.m.  
 4 (Brief discussion.)  
 5 THE VIDEOGRAPHER: Back on the record at 4:13  
 6 p.m.  
 7 MS. TEMPLETON: OES has no questions.  
 8 MR. BERRY: I don't think I have any questions  
 9 either.  
 10 MR. RATCLIFF: We'll read and sign. Thank you.  
 11 THE VIDEOGRAPHER: We're now off the videotape  
 12 record. The time is 4:13 p.m.  
 13 (Deposition concluded at 4:13 p.m.)  
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1 JURAT  
 2 CREOKS et al. V. OMES, Protest No. 2024-01  
 3 I, LARRY SMITH, do hereby state under oath that I  
 4 have read the above and foregoing deposition in its  
 5 entirety and that the same is a full, true and correct  
 6 transcription of my testimony so given at said time and  
 7 place.  
 8  
 9  
 10 \_\_\_\_\_  
 11 Signature of Witness  
 12  
 13  
 14 Subscribed and sworn to before me, the undersigned  
 15 Notary Public in and for the State of Oklahoma, by said  
 16 witness, LARRY SMITH, on this \_\_\_\_ day  
 17 of \_\_\_\_\_, 2024.  
 18  
 19  
 20  
 21 \_\_\_\_\_  
 22 NOTARY PUBLIC  
 23 MY COMMISSION EXPIRES: \_\_\_\_\_  
 24 (BDT) JOB FILE # 172219  
 25

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1 ERRATA SHEET  
 2 CREOKS et al. V. OMES, Protest No. 2024-01  
 3 DEPOSITION OF LARRY SMITH  
 4 REPORTED BY: Barbara Tiffée, CSR, RPR  
 5 DATE DEPOSITION TAKEN: December 17, 2024  
 6 JOB FILE NO. 172219  
 6 PAGE LINE IS SHOULD BE  
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1 CERTIFICATE  
 2  
 3 STATE OF OKLAHOMA )  
 4 ) SS:  
 5 COUNTY OF TULSA )  
 6  
 7 I, Barbara Tiffée, Certified Shorthand  
 8 Reporter within and for the State of Oklahoma, do hereby  
 9 certify that the above-named LARRY SMITH was by me first  
 10 duly sworn to testify the truth, the whole truth, and  
 11 nothing but the truth, in the case aforesaid; that the  
 12 above and foregoing deposition was by me taken in  
 13 shorthand and thereafter transcribed; and that I am not  
 14 otherwise interested in the event of said action.  
 15  
 16 IN WITNESS WHEREOF, I have hereunto set my hand and  
 17 official seal this 27th day of December, 2024.  
 18  
 19 *Barbara Tiffée, RPR*  
 20 \_\_\_\_\_  
 21 Barbara Tiffée, CSR, RPR  
 22  
 23  
 24  
 25