

NO. 05-CI-09390 JEFFERSON CIRCUIT COURT  
DIVISION EIGHT (8)  
HON. JUDGE McKAY CHAUVIN

TODD F. EKLOF PLAINTIFF

VS.

KENTUCKY FARM BUREAU FEDERATION, ET AL DEFENDANTS

DEPOSITION FOR PLAINTIFF

DEPONENT: SAM MOORE

DATE: MAY 30, 2007

REPORTER: GERRY HALL FULTON

FULTON BELANGER & ASSOCIATES  
1310 NAVAJO COURT  
LOUISVILLE, KENTUCKY 40207  
502-897-1303 OR 1-800-726-0391

The following deposition of Sam Moore was taken, pursuant to notice, at the law offices of Smith & Helman, 600 West Main Street, Louisville, Kentucky 40202-4201, on May 30, 2007, at the hour of 1:30 p.m., upon oral examination and to be used for all purposes in the trial of the above-entitled cause, in accordance with the Kentucky Rules of Civil Procedure.

APPEARANCES

For Plaintiff: Sally Hardin Lambert, Esquire  
Smith & Helman  
600 West Main Street  
Louisville, Kentucky 40202-4201

For Defendant Michael E. Krauser, Esquire  
Raymond Blust: Krauser & Brown  
2100 Waterfront Plaza  
325 West Main Street  
Louisville, Kentucky 40202

For Defendants Wayne J. Carroll, Esquire  
Sally McKenzie & Peden, P.S.C.  
Bridgewater 7508 New La Grange Road, No. 3  
and Sam Moore: Louisville, Kentucky 40222

For Defendant Scott D. Spiegel, Esquire  
Lynch, Cox, Gilman & Mahan  
500 West Jefferson Street  
Suite 2100  
Louisville, Kentucky 40202

Also Present: David Beck, Executive Vice President  
of Kentucky Farm Bureau Federation  
Sally Bridgewater  
Todd Eklof, Plaintiff

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1 Sam Moore, called in behalf of  
2 Plaintiff, after having been first duly sworn, was  
3 examined and deposed as follows:  
4

\* \* \*

5 DIRECT EXAMINATION  
6 BY MS. LAMBERT:  
7 Q. Would you state your full name and  
8 spell it for the court reporter, please?  
9 A. Sam Moore, M-o-o-r-e.  
10 Q. And what is your home address,  
11 please?  
12 A. 1070 Mooretown Road, Morgantown,  
13 Kentucky, 42261.  
14 Q. I know that you were here for at  
15 least part of Mr. Beck's deposition.  
16 A. Yes.  
17 Q. Have you had your deposition taken  
18 before?  
19 A. Not in this case, no.  
20 Q. But before?  
21 A. I have, yes.  
22 Q. And so you know that I am here to  
23 represent Mr. Eklof and to ask you some questions --  
24 A. Yes.  
25 Q. -- with regard to what went down

1 with Mr. Eklof's employment in the winter of  
 2 2004-2005?  
 3 A. Yes.  
 4 Q. And you understand that you should  
 5 let me finish my question before you answer?  
 6 A. (The witness nods his head up and  
 7 down.)  
 8 Q. Would you answer out loud, please?  
 9 A. Yes.  
 10 Q. And I will try not to step on your  
 11 answers and talk over you either. If there is a  
 12 question that I ask that you don't understand, would  
 13 you please let me know and I'll try to rephrase it,  
 14 otherwise, I'll assume that you knew what I was  
 15 asking.  
 16 A. Okay.  
 17 Q. And have you taken any kind of  
 18 medication today that might make it difficult for you  
 19 to understand the questions or formulate the answers?  
 20 A. No.  
 21 Q. Not on any allergy meds today?  
 22 A. No.  
 23 Q. I'd like to show you a copy of the  
 24 complaint in this case, and I believe that the rest  
 25 of the other attorneys have copies of this document.

1 A. I was also the president.  
 2 Q. Okay. And how long were you the  
 3 president of those companies?  
 4 A. For seven years.  
 5 Q. And what were your responsibilities  
 6 as president of both of those companies?  
 7 A. I dealt with the policy issues, the  
 8 implementation of the policy, and mainly, you know,  
 9 testified; worked on legislation; traveled to  
 10 Washington; represented Farm Bureau in several  
 11 different organizations.  
 12 Q. When you say you worked on policy  
 13 matters, what types of policies would that include?  
 14 A. Probably the thing that I worked on  
 15 most all during my presidency was the tobacco buyout,  
 16 especially for the last three years of my presidency  
 17 it was almost a full-time -- almost every day.  
 18 Q. Would you have been involved in  
 19 policies relating to employees of either of those  
 20 companies?  
 21 A. No.  
 22 Q. Would you have been involved in  
 23 choosing those public policies or public pieces of  
 24 legislation that the Farm Bureau Companies would be  
 25 lobbying or standing behind?

1 (The document is tendered to the  
 2 witness.)  
 3 Q. Have you seen this document before?  
 4 A. I believe I saw it early on, yes.  
 5 (Mr. Krauser comes into the room.)  
 6 MS. LAMBERT: We'll just go off the  
 7 record for just a minute and let Mr. Krauser get in.  
 8 MR. KRAUSER: Go ahead.  
 9 Q. What is your connection with  
 10 Kentucky Farm Bureau Companies?  
 11 A. I am now on their Board of  
 12 Directors. I am the immediate past president.  
 13 Q. And in the winter of 2004-2005,  
 14 what was your role with Kentucky Farm Bureau  
 15 Companies?  
 16 A. I was the president of Kentucky  
 17 Farm Bureau.  
 18 Q. Kentucky Farm Bureau, as I  
 19 understand it, is more than one company?  
 20 A. Yes.  
 21 Q. What was your role with Kentucky  
 22 Farm Bureau Federation?  
 23 A. I was the president.  
 24 Q. And Kentucky Farm Bureau Mutual  
 25 Insurance Companies?

1 A. Our policy comes from our grass  
 2 roots level.  
 3 Q. Uh-huh.  
 4 A. It starts in a county organization;  
 5 comes up through district meetings, through a  
 6 resolution committee, a policy development process,  
 7 and the resolution committee makes a report to our  
 8 voting delegates at the convention, and our policy is  
 9 established by our voting delegates.  
 10 Q. Was it a policy established by your  
 11 voting delegates that Kentucky Farm Bureau Companies  
 12 was supporting the defense or protection of marriage  
 13 amendment in Kentucky in 2004?  
 14 A. I'm not sure. I'd have to  
 15 look at -- I don't know. I'd have to look at that to  
 16 see.  
 17 Q. Were you involved with the  
 18 overall -- is it the American Farm Bureau?  
 19 A. Yes.  
 20 Q. Did they have a policy with regard  
 21 to the defense or protection of marriage laws  
 22 throughout the country?  
 23 A. I don't know the exact policy. I  
 24 would have to look at that to see.  
 25 Q. I'd like you to look at the

1 complaint, and you said that you've seen it before  
2 and --

3 A. It's been a while that I --

4 Q. -- you probably noticed that your  
5 name is there?

6 A. Yes.

7 Q. In going through this, did you  
8 understand what allegations Mr. Eklof made with  
9 regard to you that made you part of this litigation?

10 A. As president of the organization, I  
11 would assume.

12 Q. I'd like you to look back at  
13 Exhibit B to the complaint, and Mr. Carroll can  
14 probably help you find it.

15 MR. CARROLL: Exhibit what, now?

16 MS. LAMBERT: B.

17 MR. CARROLL: B?

18 MS. LAMBERT: Yes. He's looked at  
19 this enough times now that he probably noticed it.

20 MR. CARROLL: Let me see it.

21 (The document is tendered to the  
22 witness.)

23 MR. CARROLL: Is that B?

24 MS. LAMBERT: Yes, sir.

25 Q. (By Ms. Lambert) Had you seen that

1 2005, and I ask you to do that only to find  
2 Attachment A to that exhibit, which is a letter dated  
3 November 29, 2004, and that letter dated November 29,  
4 2004 is addressed to you. Do you recall receiving  
5 that letter?

6 A. I'm sure I did.

7 Q. Do you recall what you did when you  
8 received that letter?

9 A. No, not really.

10 Q. Did you ever respond directly to  
11 Mr. Eklof with regard to that letter?

12 A. I don't think so, not that I  
13 remember, no.

14 Q. Why not?

15 A. Because I did not get involved with  
16 personnel matters.

17 Q. Did you even respond and say I  
18 don't get involved in personnel matters; you'll have  
19 to take this up with somebody else?

20 A. Not that I recall.

21 Q. Did you follow up with anyone with  
22 regard to a response to this letter?

23 A. I don't recall.

24 Q. Did you discuss this letter with  
25 anyone?

1 document before you received the complaint?

2 A. I think I had seen a copy of this,  
3 yes.

4 Q. You were aware, then, in the winter  
5 of 2004-2005, that there were some issues with regard  
6 to Mr. Eklof's employment?

7 A. Yes.

8 Q. And how would you state those  
9 issues?

10 A. I think Mr. Eklof had taken a  
11 public stand on an issue that our employees were not  
12 supposed to do.

13 Q. And what was that issue?

14 A. The marriage of men and women.

15 Q. Is there any statement, that you're  
16 aware of, that prohibits employees from taking a  
17 stand on political questions?

18 A. I think it's just general knowledge  
19 that our employees were not to do that. I don't know  
20 if it's written down or not. I don't know.

21 Q. Did anyone ever tell you not to  
22 take a stand on a political issue?

23 A. No.

24 Q. I'll ask you to look at Exhibit H  
25 to the complaint, which is a letter dated January 6,

1 A. I'm sure David and I would have  
2 discussed the letter, yes.

3 Q. Did you ask Mr. Beck, and by David  
4 I'm --

5 A. Mr. Beck, yes.

6 Q. Did you ask Mr. Beck to handle the  
7 matter for you?

8 A. I don't recall asking him to handle  
9 it for me. I mean I did not respond to it because I  
10 just felt like it wasn't my place to.

11 Q. Why would it have not been your  
12 place to?

13 A. Because as president I didn't get  
14 involved in personnel matters.

15 Q. Was there a job description for the  
16 president of the companies?

17 A. Yes.

18 Q. Where is that found?

19 THE WITNESS: Do you have that?

20 MR. CARROLL: I'm handing you a  
21 copy of Article XI from the Constitution and Bylaws  
22 of the Kentucky Farm Bureau Federation.

23 MS. LAMBERT: I'd like to go ahead  
24 and mark the complaint Exhibit 1, and mark this as  
25 Exhibit 2.

1 (Whereupon, Plaintiff's Exhibit  
 2 Numbers 1 and 2 were marked for identification.)  
 3 MR. CARROLL: Fine.  
 4 MS. LAMBERT: Are these five the  
 5 only duties of the president?  
 6 MR. CARROLL: Those describe the  
 7 general duties of the president, and in Section 5 it  
 8 describes the duties of the executive vice president,  
 9 and that is the executive officers.  
 10 MS. LAMBERT: I would like to go  
 11 ahead and admit items 1 and 2 as our exhibits to the  
 12 deposition.  
 13 MR. CARROLL: All right.  
 14 Q. When did you cease being president  
 15 of the Farm Bureau?  
 16 A. In December of '05.  
 17 Q. Did you have any role before -- you  
 18 said you were there seven years?  
 19 A. I was elected in December of '08 --  
 20 '98, I'm sorry.  
 21 Q. Before December of '98, were you  
 22 involved somehow with the Farm Bureau?  
 23 A. I was first vice president, and  
 24 then prior to that I was second vice president. I've  
 25 been on their Board of Directors since 1976.

1 document marked the Answer of --  
 2 MR. CARROLL: Did you have this  
 3 marked?  
 4 MS. LAMBERT: Yes. Could we get  
 5 his copies of 1 and 2, please, because that's the  
 6 ones that are going to go to the court reporter. One  
 7 is the complaint, and 2 is your --  
 8 MR. CARROLL: Yeah.  
 9 MS. LAMBERT: So that she can mark  
 10 those.  
 11 (The documents are tendered to the  
 12 court reporter.)  
 13 MS. LAMBERT: One is the complaint,  
 14 and 2 is his one-page document.  
 15 (Whereupon, Plaintiff's Exhibit  
 16 Numbers 1 and 2 were marked for identification, and  
 17 attached hereto.)  
 18 Q. This document is headed the Answer  
 19 of Defendant Sam Moore.  
 20 (The document is tendered to the  
 21 witness.)  
 22 Q. Have you seen this document before?  
 23 A. It's been a while but, yes, I've  
 24 seen it.  
 25 Q. Did you review it before it was

1 Q. So basically thirty years?  
 2 A. Yes.  
 3 Q. Were you ever an employee of the  
 4 Kentucky Farm Bureau Federation or the insurance  
 5 companies or any of the other companies that make up  
 6 Kentucky Farm Bureau Companies?  
 7 A. I received a per diem from the  
 8 Federation, and compensation from the insurance  
 9 companies.  
 10 Q. As in your role as the president?  
 11 A. Yes.  
 12 Q. Before you began your ascension to  
 13 president, were you ever an employee of either of the  
 14 companies?  
 15 A. No.  
 16 Q. How did you become involved in the  
 17 company?  
 18 A. Through their young farmer  
 19 program --  
 20 Q. So your profession is --  
 21 A. -- entering their contest.  
 22 Q. You're in the agricultural  
 23 business?  
 24 A. Yes, I'm a farmer.  
 25 Q. Okay. I'd like to show you a

1 filed?  
 2 A. Pardon me?  
 3 Q. Did you review it before it was  
 4 filed?  
 5 A. Yes.  
 6 Q. So you agree with all of the  
 7 statements?  
 8 MR. CARROLL: Note my objection to  
 9 that. As I have stated in these other depositions,  
 10 an answer involves communications between Mr. Moore  
 11 and an attorney, and that's protective. It also  
 12 represents the input of the attorney and involves a  
 13 question of law, conclusions of law, opinions as to  
 14 the law, and so I object to a witness, a lay person,  
 15 being asked a blanket question like that; it's  
 16 totally inappropriate, and I don't think a court  
 17 would permit that.  
 18 Q. Did you review this paragraph  
 19 before it was filed?  
 20 A. Did I study it for its accuracy?  
 21 Q. Yes.  
 22 MR. CARROLL: Just note my  
 23 objection.  
 24 Q. Did you study it for its accuracy?  
 25 MR. CARROLL: I objected, but, you

1 know, you may answer it, if you recall.  
 2 A. I can't say if every word in here  
 3 is true or not, you know.  
 4 MS. LAMBERT: I'd like to have this  
 5 marked as Exhibit 3.  
 6 (Whereupon, a discussion was held  
 7 off the record.)  
 8 (Whereupon, Plaintiff's Exhibit  
 9 Number 3 was marked for identification, and attached  
 10 hereto.)  
 11 Q. I'd like to hand you a copy of the  
 12 document that's entitled Answer of Kentucky Farm  
 13 Bureau Mutual Insurance Company.  
 14 (The document is tendered to the  
 15 witness.)  
 16 Q. Have you seen that document before?  
 17 A. I'm sure I have, but, you know,  
 18 it's been a long time since I've seen any of this.  
 19 Q. In your capacity as president of  
 20 Kentucky Farm Bureau Mutual Insurance Company, would  
 21 you have reviewed it before it was filed?  
 22 A. I'm sure I've seen it, yes.  
 23 MS. LAMBERT: I'd like this to be  
 24 marked as Exhibit 4.  
 25 (Whereupon, a discussion was held

1 entitled Answer of Defendant Kentucky Farm Bureau  
 2 Federation.  
 3 (The document is tendered to the  
 4 witness.)  
 5 Q. Do you recall having seen that  
 6 document before?  
 7 MR. CARROLL: Just note my  
 8 objection to all of these questions about answers  
 9 that have been filed for the reasons I've already  
 10 stated.  
 11 A. I'm sure I've seen it. I don't  
 12 recall when or in what capacity.  
 13 Q. Who would have reviewed it on  
 14 behalf of Kentucky Farm Bureau Federation, do you  
 15 know?  
 16 A. As far as legal accuracy and all of  
 17 that, or --  
 18 Q. As far as factual accuracy. I know  
 19 that you are not an attorney; right?  
 20 A. No, far from it.  
 21 Q. Who would have reviewed it on  
 22 behalf of you?  
 23 A. I would assume Mr. Carroll.  
 24 Q. Would someone from the management  
 25 of Kentucky Farm Bureau Federation also have reviewed

1 off the record.)  
 2 (The document is tendered to the  
 3 court reporter.)  
 4 (Whereupon, Plaintiff's Exhibit  
 5 Number 4 was marked for identification, and attached  
 6 hereto.)  
 7 Q. I'd like to show you a document  
 8 entitled Answer of Defendant Kentucky Farm Bureau  
 9 Companies.  
 10 (The document is tendered to the  
 11 witness.)  
 12 Q. Have you seen that document before?  
 13 A. I think I -- I'm sure I have, but I  
 14 don't remember. I don't specifically remember.  
 15 Q. I'd like to show you a document --  
 16 do you know who would have reviewed it on behalf  
 17 of --  
 18 A. I'm sure I did. I mean I'm sure I  
 19 looked at it.  
 20 MS. LAMBERT: Then I'd like that  
 21 marked as Exhibit 5.  
 22 (Whereupon, Plaintiff's Exhibit  
 23 Number 5 was marked for identification, and attached  
 24 hereto.)  
 25 Q. I'd like to show you a document

1 it?  
 2 A. I would assume that they have seen  
 3 it, yes.  
 4 Q. Would you have seen it before it  
 5 was filed?  
 6 A. I'm sure I have. If it pertained  
 7 to me, I'm sure they showed it to me.  
 8 MS. LAMBERT: I'd like that marked  
 9 as Exhibit 6.  
 10 (Whereupon, Plaintiff's Exhibit  
 11 Number 6 was marked for identification, and attached  
 12 hereto.)  
 13 Q. Were you aware that Mr. Eklof was  
 14 interviewed on television with regard to his stand on  
 15 gay marriage?  
 16 A. After awhile I was, yes. I did not  
 17 see it.  
 18 Q. How did you become aware of that?  
 19 A. Through word of mouth by some  
 20 people, and, you know, I had some directors talk to  
 21 me about it, called me about it. I think Mr. Beck  
 22 called me about it and told me what had happened  
 23 there.  
 24 Q. Did you ever speak directly with  
 25 Mr. Eklof with regard to that incident?

1 A. No, no.  
 2 Q. Were you aware that Mr. Eklof  
 3 appeared on television with regard to his protest of  
 4 the war in Iraq?  
 5 A. I don't recall that. I think that  
 6 might have been all a part of that -- I'm not sure.  
 7 Q. Were you aware that Mr. Eklof has  
 8 written letters to The Courier-Journal?  
 9 A. Yes.  
 10 Q. When did you become aware of that?  
 11 A. I saw some of them in the paper.  
 12 Q. When they were published?  
 13 A. I saw some in the paper when the  
 14 paper came out, yes. I was called about some of the  
 15 others by members of our board.  
 16 Q. Did you ever talk to Mr. Eklof  
 17 about that?  
 18 A. No, I did not.  
 19 Q. Did you ever talk to Mr. Beck about  
 20 that?  
 21 A. We had had conversations about it,  
 22 yes.  
 23 Q. Do you know if anyone ever spoke to  
 24 Mr. Eklof about the letters -- from the Farm Bureau  
 25 ever discussed with Mr. Eklof the letters he had

1 this a problem, but ~~we don't~~ have it resolved?  
 2 A. I don't recall that.  
 3 Q. Were you aware that Mr. Eklof's  
 4 doctor took him off work in the middle of December of  
 5 2004?  
 6 A. I don't know the time frame. I  
 7 know that was part of the issue, yes.  
 8 Q. Was that a problem with the Farm  
 9 Bureau, that his doctor took him off work?  
 10 A. I'm not sure. I mean that was a  
 11 personnel matter. I honestly did not get involved in  
 12 these things.  
 13 Q. Why did you say it was an issue?  
 14 A. Pardon me?  
 15 Q. Why did you use the word issue to  
 16 describe that?  
 17 MR. CARROLL: I didn't hear him say  
 18 issue. He explained to you what he's talking about,  
 19 and that's a personnel matter, and that would be  
 20 somebody else handled that. He's dealing with  
 21 policies.  
 22 MS. LAMBERT: He said that he knew  
 23 that Mr. Eklof's being taken off work was an issue,  
 24 and I wanted to know why --  
 25 A. I knew that he had been taken off

1 written to The Courier-Journal?  
 2 A. I don't know. I know I didn't, no.  
 3 Q. Did you consider them a violation  
 4 of any policy of Kentucky Farm Bureau?  
 5 MR. KRAUSER: You're talking about  
 6 the letters?  
 7 MS. LAMBERT: Yes.  
 8 A. We have had conversations about the  
 9 inappropriateness of doing that, yes.  
 10 Q. We would mean who?  
 11 A. Some of our board members, and I'm  
 12 sure Mr. Beck.  
 13 Q. But would we include Mr. Eklof?  
 14 A. I never had a conversation with Mr.  
 15 Eklof about it, again, because I didn't get involved  
 16 in personnel matters.  
 17 Q. Did anyone ever report to you about  
 18 having a conversation with Mr. Eklof about writing  
 19 letters to the editor?  
 20 A. I'm not sure. I can't definitely  
 21 say that.  
 22 Q. Did anyone say I know you consider  
 23 this a problem, but we've got it resolved now?  
 24 A. I don't recall that.  
 25 Q. Did anyone say I know you consider

1 work because of a doctor's order.  
 2 Q. Okay.  
 3 A. That's what I meant by being an  
 4 issue.  
 5 Q. Was that considered something that  
 6 he should not have done?  
 7 A. I don't think so. I mean I -- not  
 8 to my knowledge.  
 9 Q. Were you normally apprised when --  
 10 were you normally told when employees had to take  
 11 time off from their work?  
 12 A. No.  
 13 Q. Was it unusual, then, that you knew  
 14 that Mr. Eklof was off work?  
 15 A. I don't think it was unusual, no.  
 16 I mean I wasn't apprised when everybody took off, but  
 17 I know, you know, when lots of others were off  
 18 because of medical reasons or doctor's orders, or  
 19 whatever, I knew that, but it wasn't something that  
 20 I --  
 21 Q. Were you aware of anyone  
 22 questioning whether Mr. Eklof actually needed to be  
 23 off work?  
 24 A. No.  
 25 Q. Do you know if the Kentucky Farm

1 Bureau Companies questioned their employees with  
 2 regard to medical necessity of being of work?  
 3 A. I don't know what the process was.  
 4 Q. You said you were in the  
 5 agriculture business?  
 6 A. Yes.  
 7 Q. What is your operation of your  
 8 particular business?  
 9 A. I farm about four thousand acres  
 10 with twenty-six or twenty-seven hundred acres of row  
 11 crops. I run about a thousand head of cattle, and  
 12 also I own and manage a feed and farm supply  
 13 business.  
 14 Q. How many employees do you have?  
 15 A. I have four employees on the farm,  
 16 and eleven at my store.  
 17 Q. Are you involved in the personnel  
 18 matters of those fifteen people?  
 19 A. Yes.  
 20 Q. Do you have any specific training  
 21 in personnel matters?  
 22 A. No.  
 23 Q. Do you ever rely on anyone from the  
 24 Farm Bureau to give you advice with regard to human  
 25 resources or personnel matters?

1 A. No.  
 2 Q. Who do you rely on for those, if  
 3 those questions come up on your farm?  
 4 A. I guess it would be me. We've  
 5 never had one.  
 6 Q. Did Mr. Beck keep you advised with  
 7 what was going on with Mr. Eklof?  
 8 A. In a general sort of way.  
 9 Q. Do you recall how many times you  
 10 talked with Mr. Beck about Mr. Eklof?  
 11 A. No.  
 12 Q. Were you aware that Mr. Eklof was  
 13 being barred from the premises while he was still an  
 14 employee?  
 15 A. I knew that after the fact, yes.  
 16 Q. Do you know why he was barred from  
 17 the premises?  
 18 A. We never discussed that. I mean I  
 19 don't -- I mean we -- I don't recall the  
 20 circumstances of that, you know, of all that  
 21 conversation.  
 22 Q. What do you recall about Mr.  
 23 Eklof's employment from, say, the 15th of November of  
 24 2004 through January 18, 2005?  
 25 A. I can't say. I don't know. Mr.

1 Beck and I would meet, as a general rule, once or  
 2 twice a week when I was in the office and he would  
 3 bring me up to speed on things that were happening in  
 4 and out of the office, and as an executive officer to  
 5 me as president. That was my involvement.  
 6 Q. Was Mr. Eklof considered one of  
 7 those matters that needed your attention as president  
 8 of the company?  
 9 A. Mr. Beck would report to me things  
 10 that had taken place, but, again, I did not get  
 11 involved in them.  
 12 Q. What was the criteria that you and  
 13 Mr. Beck used to determine what things you needed to  
 14 hear about, and what things you didn't?  
 15 A. I would have issues that I would  
 16 want David's input on, and he would report to me  
 17 things that he thought that I needed to know about,  
 18 as president of the company.  
 19 Q. Was Mr. Eklof one of those issues  
 20 that you felt that you needed to know about?  
 21 A. He would periodically update me on  
 22 it, yes.  
 23 Q. Why did you feel you needed to be  
 24 advised about Mr. Eklof?  
 25 A. As president of the company, just

1 to know what was going on within the company.  
 2 Q. Were there any other employees that  
 3 you wanted to be advised about?  
 4 A. Well, I was interested in all of  
 5 our employees, you know, but -- and we have discussed  
 6 other employees at times, just as a general rule.  
 7 Q. Were those other employees being  
 8 terminated?  
 9 A. No.  
 10 Q. Do you recall who those were that  
 11 Mr. Beck would discuss with you; what other employees  
 12 would Mr. Beck discuss with you?  
 13 MR. CARROLL: Just note my  
 14 objection to that.  
 15 A. I don't recall specifically. I  
 16 can't -- I can't say.  
 17 Q. Did you communicate to anyone  
 18 affiliated with the Kentucky Farm Bureau Companies  
 19 when Mr. Eklof was terminated?  
 20 A. Did I what, now?  
 21 Q. Did you tell anyone affiliated with  
 22 the Kentucky Farm Bureau Companies when Mr. Eklof was  
 23 terminated?  
 24 A. Not that I remember, no.  
 25 Q. Did people contact you with regard

1 to his termination?  
 2 A. I would have probably had some  
 3 directors call me and ask, you know, if he had been  
 4 terminated.  
 5 Q. Did they give a reason for wanting  
 6 to know?  
 7 A. Just, as the directors of the  
 8 company, wanted to know what had happened.  
 9 Q. Okay. What did he tell them?  
 10 A. I would say yes, he has been.  
 11 Q. Did you tell them why?  
 12 A. You know, I didn't know all the  
 13 reasons why, really.  
 14 Q. What did you know about why he was  
 15 terminated?  
 16 A. The issue of taking his public  
 17 stance on a very controversial issue.  
 18 Q. And that was?  
 19 A. The marriages, I think. I think  
 20 that was the main thing.  
 21 MS. LAMBERT: Well, that's all the  
 22 questions I have.  
 23 MR. KRAUSER: I have no questions.  
 24 MR. CARROLL: Let's take about five  
 25 minutes.

STATE OF KENTUCKY )  
 ) SS.  
 COUNTY OF JEFFERSON )

I, Gerry Hall Fulton, a Notary Public, within and for the State at Large, do hereby certify that the foregoing deposition was taken before me at the time and place and for the purpose in the caption stated; that the witness was first duly sworn to tell the truth, the whole truth and nothing but the truth; that the deposition was reduced to shorthand writing by me in the presence of the witness; that the foregoing is a full, true, and correct transcript of my stenographic notes; that there was a request that the witness read and sign the deposition; that the appearances were as stated in the caption.

Witness my signature this 2nd day of June 2007.

My commission expires July 13, 2009.

\_\_\_\_\_  
 Gerry Hall Fulton  
 Court Reporter and Notary Public  
 State at Large Kentucky

1 (Whereupon, a short recess was  
 2 taken.)  
 3 MR. CARROLL: We have no questions,  
 4 but we would like to read and sign.  
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STATE OF KENTUCKY )  
 ) SS.  
 COUNTY OF JEFFERSON )

I, Sam Moore, the undersigned deponent, have this date read the foregoing pages of my deposition, numbers one through 30 and with the changes noted below, if any, these pages constitute a true and accurate transcription of my deposition given on May 30, 2007 at the time and place stated herein.

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