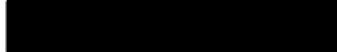


Lance Miller, Ph.D.
August 09, 2022

IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON
IN AND FOR KING COUNTY

 individually,)
)
Plaintiff,)
) No. 21-2-08166-1 SEA
vs.)
)
AMERICAN ASSOCIATION OF)
ZOOLOGICAL PARKS AND AQUARIUMS)
INC. D/B/A ASSOCIATION OF ZOOS &)
AQUARIUMS,)
Defendants.)

REPORTER'S TRANSCRIPT OF PROCEEDINGS

DEPOSITION OF LANCE MILLER, PH.D.
APPEARING REMOTELY FROM
CHICAGO, ILLINOIS

CONDUCTED VIA VIDEOCONFERENCE
August 9, 2022
9:30 A.M. MST

Reported by:
Kristi K. Week, RPR
WA Certified Court Reporter # 21004996

1 facilities?

2 A. With a couple of facilities, not too many
3 facilities.

4 Q. And did they tell you what they meant when they
5 said "pushed too hard"?

6 A. Wouldn't stop until he got his way.

7 Q. And did they give you any more detail, other than
8 that he would not stop until he got his way?

9 A. Not that I recall.

10 Q. Okay. And did Ms. Perkins or this third person
11 tell you the identities of the facilities where he had
12 pushed too hard?

13 A. I believe they mentioned Denver Zoo, but I think
14 that was the only one. I can't remember.

15 Q. And did they tell you how they knew that
16 [REDACTED] too hard with the Denver Zoo?

17 A. I don't believe they shared any detail, no. I'm
18 assuming it's because they were part of the SSP.

19 Q. Do you know what Ms. Perkins' title was with SSP?

20 A. I do not.

21 Q. What about Ms. Schwetz?

22 A. I do not recall.

23 Q. And just to -- just to make sure I'm clear, you
24 can't recall whether it was Ms. Perkins or this third
25 person who told you that [REDACTED] pushed too hard with a

1 A. Yeah. I don't think we even left the office, if
2 I remember correctly, but it was a joint decision that it
3 just wasn't going to work moving forward.

4 Q. Who's the -- can I ask this question, who's the
5 formal decisionmaker with respect to termination of
6 [REDACTED] employment? Is it you? Can you do that? Can
7 you make that decision yourself?

8 A. Honestly, I don't know what CZS policy is. I
9 worked with Sandi and the HR team throughout the process.

10 Q. Understood. Okay.

11 So at this meeting with you and Sandi, you
12 decide together that it's not going to work with [REDACTED]
13 working for the zoo and so you're going to terminate his
14 employment; right?

15 A. Correct.

16 Q. And what were the reasons, in your mind, for
17 terminating [REDACTED] employment?

18 A. He wasn't going to uphold the standards that we
19 thought appropriate as a CZS employee. Again, he was more
20 concerned about finding out who approached me, as opposed
21 to working on building relationships. I had lost all
22 trust in him, and the fact that he stated, based on the
23 correspondence in the Denver email, he didn't see any
24 concerns with his behavior, that was also a big red flag,
25 not the fact that he had actually done it, but the fact

1 Q. And you were involved in the approval of those
2 requests; correct?

3 A. I don't know when he requested those samples and
4 if I was in the position or not at that time.

5 Q. Okay. Do you have any recollection or do you
6 dispute that you would have been involved?

7 A. I'm not saying that I did or I did not. I don't
8 recall.

9 Q. As a part of that process, did you come away with
10 any negative impressions of how [REDACTED] interacted with
11 either you or anyone at the Brookfield Zoo?

12 A. Again, I don't recall reviewing that proposal, if
13 that came in during my time. I would have to go back and
14 look at it again.

15 Q. All right. Fair enough.

16 Is it fair to say you were quite
17 enthusiastic when [REDACTED] ultimately accepted employment
18 with the Brookfield Zoo?

19 A. That would be fair. Yes, that's accurate.

20 Q. Why?

21 A. Because I was excited about building a
22 conservation program with him and working with him to
23 build something the zoo could be proud of.

24 Q. Okay. Well, why did you feel [REDACTED] could be
25 someone with whom you could build something the zoo could

1 be proud of?

2 A. Because of his background, his skills, his
3 expertise, and he interviewed quite well.

4 Q. Sure. In fact, at the time you described that
5 [REDACTED] could be one of the most influential hires the
6 Chicago Zoological Society ever made; right?

7 A. Correct.

8 MR. MCLEAN: Okay. And so I want to show
9 you some documents. And where are we at? We're up to
10 Exhibit 6?

11 COURT REPORTER: Correct.

12 (Exhibit Number 6 marked for identification.)

13 COURT REPORTER: I think he just froze and
14 fell off.

15 MS. HANLEY: Yeah, that's what I understand
16 too. His computer crashed, and he's logging back in.
17 Sorry.

18 COURT REPORTER: Can we go off the record
19 then until he comes back.

20 MR. STONE: Okay.

21 VIDEOGRAPHER: Going off the record at
22 11:34.

23 (Brief recess.)

24 VIDEOGRAPHER: Going back on the record at
25 11:46.

1 MR. STONE: Objection to form.

2 THE WITNESS: Again, I assume that Jamie or
3 Andrea put me in touch with them.

4 BY MR. MCLEAN:

5 Q. Well, how did Jamie or Andrea know to reach out
6 to you?

7 MR. STONE: Objection to form.

8 THE WITNESS: I honestly don't know.
9 Somehow all these people found out that [REDACTED] was the new
10 scientist at CZS, and I had not shared it with any of
11 these people, so I don't know how they found it out.

12 BY MR. MCLEAN:

13 Q. Did you find it odd that these people were
14 approaching you where they had never before approached you
15 with regards to [REDACTED]

16 MR. STONE: Objection to form.

17 THE WITNESS: I had actually worked with
18 Jamie Ivy for years at San Diego Zoo and knew her quite
19 well.

20 BY MR. MCLEAN:

21 Q. Sure. You also worked with Ronda Schwetz; right?

22 A. At Disney, yep, years ago.

23 Q. And you also worked with Sharon Jacobs; right?

24 A. Sharon Joseph.

25 Q. Sharon Joseph, who was the person with whom

1 [REDACTED] had an unfortunate email exchange at the Denver
2 Zoo; right?

3 A. Correct.

4 Q. So these aren't just random people approaching
5 you at the AZA conference; these are former colleagues of
6 yours as well; right?

7 A. So Jamie Ivy and Andrea Putnam I both worked with
8 at San Diego, and Ronda Schwetz I worked with at Disney's
9 Animal Kingdom. I had not worked with Lori Perkins at
10 that institution or the other person.

11 Q. Sure. You worked with Ronda Schwetz for a period
12 of about four years; right?

13 A. That sounds about right. I'd have to double
14 check. I don't remember exactly when she was employed and
15 when I left.

16 Q. Sure. And you and Ronda were friendly; right?

17 A. Yeah. I mean, we were colleagues.

18 Q. Had you ever been -- had you ever spent time with
19 her socially at AZA conferences?

20 A. Possibly. Honestly I don't recall, like, setting
21 an exact time to go have dinner with her or anything like
22 that, but we probably ran into each other occasionally at
23 conferences and chatted cordially.

24 Q. Had you ever had a situation where you and Ronda
25 Schwetz consumed alcohol together?

1 A. Possibly.

2 Q. Let me ask you, when you -- when these
3 individuals on the AZA SSP orangutan committee approached
4 you, one of the things that Ronda said -- and Ronda was
5 standing right there; right?

6 A. Correct.

7 Q. She was one of the three participants from the
8 AZA's committee who were speaking with you about [REDACTED]
9 [REDACTED] right?

10 A. She was -- she was present; correct.

11 Q. And one of the things she said initially was,
12 "I'm not going to comment given my situation." Right?

13 A. I don't remember if those were the exact words,
14 but that was the general concept, correct.

15 Q. Did you not think to ask what are you talking
16 about?

17 MR. STONE: Object to form.

18 THE WITNESS: I figured it was her -- if
19 there was something going on personally then that's her
20 choice.

21 BY MR. MCLEAN:

22 Q. Did these other individuals, who were also on the
23 SSP -- the orangutans SSP, ask Ronda what she was talking
24 about?

25 A. They did not.