

Exhibit 6

Deposition of Victoria G. Baggett

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IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF FLORIDA
PENSACOLA DIVISION

Case No. 3:23-CV-10385-TKS-ZCB

PEN AMERICAN CENTER, INC.,
SARAH BRANNEN, BENJAMIN GLASS,
on behalf of himself and his
minor child, GEORGE M. JOHNSON,
DAVID LEVITHAN, KYLE LUKOFF,
ANN NOVAKOWSKI, on behalf of
herself and her minor child,
PENGUIN RANDOM HOUSE LLC, SEAN
PARKER, on behalf of himself
and his minor child, ASHLEY
HOPE PEREZ, and CHRISTOPHER
SCOTT SATTERWHITE, on behalf of
himself and his minor child,

Plaintiffs,
vs.

ESCAMBIA COUNTY SCHOOL BOARD,

Defendant.

VIDEOTAPED DEPOSITION OF VICTORIA G. BAGGETT

Taken on Behalf of the Plaintiffs

DATE TAKEN: Thursday, July 25, 2024

TIME: 9:35 a.m. - 1:46 p.m. CDT

PLACE: Anchor Court Reporting
229 South Baylen Street
Pensacola, Florida 32502

Examination of the witness stenographically taken by:

SUSAN D. WASILEWSKI
Registered Professional Reporter
Certified Realtime Reporter
Certified Manager of Reporting Services
Certified Realtime Captioner
Florida Professional Reporter
~ Realtime Systems Administrator ~

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SUSAN WASILEWSKI, Court Reporter

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1 THEREUPON, the following proceedings were had
2 and taken at 9:35 a.m. CDT:

3 THE VIDEOGRAPHER: We are now on the record and
4 the time is now 9:35 a.m. Central. Today's date is
5 July 25th, 2024. This is the video recorded
6 deposition of Victoria Baggett being held at Anchor
7 Court Reporting taken in the matter of Pen American
8 Center, Incorporated, et al., vs. Escambia County
9 School Board.

10 The videographer is Joanna Arauz with Cardinal
11 Legal Video and the court reporter is Susan
12 Wasilewski with Anchor Court Reporting.

13 Counsel, will you please announce your name and
14 whom you represent, after which the court reporter
15 will swear in the witness.

16 MR. SAFIER: Paul Safier from Ballad Spahr and
17 I represent Plaintiffs.

18 MS. SMITH: Nicole Smith, Rumberger Kirk, I
19 represent the Defendant.

20 MS. REGAN: Sharon Regan and I represent the
21 witness, Vicki Baggett.

22 MR. SAFIER: And there are various additional
23 persons who are listening in on a phone line. Their
24 appearances will be noted on the record.

25 THE COURT REPORTER: Would you raise your right

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1 hand?

2 Do you solemnly swear or affirm the testimony
3 you're about to give will be the truth, the whole
4 truth, and nothing but the truth?

5 THE WITNESS: I do.

6 THE COURT REPORTER: Thank you.

7 VICTORIA G. BAGGETT, called as a witness by the
8 Plaintiffs, having been first duly sworn, testified as
9 follows:

10 DIRECT EXAMINATION

11 BY MR. SAFIER:

12 Q. Good morning, Ms. Baggett.

13 A. Good morning.

14 Q. We met off the record but my name is Paul
15 Safier and I represent the Plaintiffs. Can you state
16 your full name for the record?

17 A. Victoria Gandy Baggett.

18 Q. And what is your date of birth?

19 A. 06/19/67.

20 Q. What is your current address?

21 A. 6211 CW Caraway Road, Century, Florida.

22 Q. Have you ever had your deposition taken before?

23 A. No.

24 Q. All right. So I'm going to just go over the
25 ground rules but I'm sure at some point these were

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1 explained to you. So the way it works is I ask
2 questions, you provide answers, and the court reporter
3 takes everything down. Because there is a written
4 transcript, it's very important that we try not to talk
5 over each other. Does that make sense?

6 A. Uh-huh.

7 Q. And it's also important that you answer every
8 question verbally, "yes," "no." Does that make sense?

9 A. Yes, it does.

10 Q. Another personal point if for any reason you
11 don't understand the question, it's poorly phrased, I'm
12 mumbling, just let me know and I'll do my best to
13 clarify. Does that make sense?

14 A. Yes.

15 Q. And the assumption will be if you do answer a
16 question, that you understood the question posed. Does
17 that make sense?

18 A. Yes.

19 Q. Another point to mention, it's not an endurance
20 contest. If at any point you need a break, you need to
21 use the restroom, you want to get a drink, you just want
22 to stretch your legs, just let me know and we'll
23 accommodate. The only thing I ask is that if there is a
24 question pending, you answer that question. Does that
25 make sense?

Deposition of Victoria G. Baggett

1 A. Yes.

2 Q. If during the course of the deposition you
3 remember anything that you had previously not been able
4 to provide as an answer, feel free to go back and, you
5 know, reclarify your answer. Does that make sense?

6 A. Yes.

7 Q. Okay. I'm going to ask two awkward questions
8 that I have to ask. Are you taking any medication that
9 would prevent you from understanding my questions and
10 answering them truthfully?

11 A. No.

12 Q. Is there anything going on in your life at all
13 that would prevent you from answering my questions and
14 answering truthfully?

15 A. No.

16 Q. Thank you. I appreciate that. You're
17 testifying here today because you were subpoenaed,
18 correct?

19 A. Yes.

20 MR. SAFIER: I'm going to mark this as
21 Exhibit 1.

22 (Baggett Exhibit 1 was marked for identification.)

23 BY MR. SAFIER:

24 Q. So please take a look at Exhibit 1 and let me
25 know when you are ready.

Deposition of Victoria G. Baggett

1 A. Okay.

2 Q. Have you seen this document before?

3 A. Yes.

4 Q. Is this, to your understanding, a document
5 subpoena that was served on you earlier in this case?

6 A. Yes, it looks to be.

7 Q. And did you in fact gather documents and
8 produce them in response to the subpoena?

9 A. Yes.

10 MR. SAFIER: I want to mark this as Exhibit 2.

11 (Baggett Exhibit 2 was marked for identification.)

12 (Discussion off the record.)

13 BY MR. SAFIER:

14 Q. So, Ms. Baggett, let me know when you've had a
15 chance to look at Exhibit 2.

16 A. Okay.

17 Q. Is what you're looking at as Exhibit 2 a
18 deposition subpoena you received in this case?

19 A. Yes.

20 Q. And you're appearing today pursuant to the
21 subpoena, correct?

22 A. Yes.

23 Q. Thank you. Did you do anything to prepare for
24 your deposition today?

25 A. I looked up on the Internet what a deposition

Deposition of Victoria G. Baggett

1 was.

2 Q. What did you learn?

3 A. That it's basically in lieu of being in a
4 courtroom but that it is documentary type, so...

5 Q. Very good. Did you meet with your lawyer at
6 all in preparation for today's deposition?

7 A. Just before here.

8 Q. Okay. Other than your lawyer, did you talk
9 with anyone about your deposition today?

10 A. No.

11 Q. So anyone at the school district?

12 A. No.

13 Q. Anyone at the school -- any member of the
14 school board?

15 A. No.

16 Q. Any lawyers for the school board?

17 A. No.

18 Q. Where did you grow up?

19 A. The same place I live now, same community.

20 Q. Oh.

21 A. As a matter of fact, it's named after my
22 great-grandfather who lived to be 108.

23 Q. That is fascinating. Thank you. Am I correct
24 that you have both an undergraduate and graduate degree
25 in English?

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1 A. That's correct.

2 Q. Where did you receive those degrees from?

3 A. University of Alabama for my undergraduate and
4 what used to be called Livingston University for my
5 gradual.

6 Q. And can I ask why you went to University of
7 Alabama if you're from Florida?

8 A. The guy that I was dating talked me into it,
9 but I'm a Roll Tide fan, so...

10 Q. Good. So after getting your graduate degree,
11 did you move back to Florida?

12 A. Yes.

13 Q. And when was that?

14 A. 1988.

15 Q. Okay. And when -- I guess I'll step back. You
16 are currently employed as a teacher, correct?

17 A. Yes.

18 Q. And when did you start teaching?

19 A. Immediately after I graduated from college,
20 1988.

21 Q. 1988. Okay. And what district did you start
22 teaching in in 1988?

23 A. Santa Rosa County.

24 Q. Say that again.

25 A. Santa Rosa County.

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1 Q. And how long did you teach there for?

2 A. One year, and then came to Monroe County in
3 Alabama.

4 Q. And how long were you teaching in Monroe
5 County?

6 A. 10 years.

7 Q. 10 years. So when did you move back to
8 Florida?

9 A. After those 10 years.

10 Q. So 1999?

11 A. Yeah.

12 Q. Okay. And what did you do in 1999?

13 A. I came to Escambia County School District.

14 Q. And you've been teaching in that school
15 district since then?

16 A. Yes.

17 Q. And you teach English?

18 A. Yes.

19 Q. What grades have you taught, and focusing just
20 on Escambia?

21 A. Let's see. Sixth, seventh, eighth, ninth,
22 tenth, eleventh and twelfth, and dual enrollment college
23 level.

24 Q. And then going back to Monroe, what grades did
25 you teach there?

Deposition of Victoria G. Baggett

1 A. Ninth, tenth and twelfth.

2 Q. And then where you started in Sarasota, I
3 believe, what grades did you teach there?

4 A. Santa Rosa.

5 Q. Santa Rosa. Sorry.

6 A. I was teaching drama and journalism and I
7 believe -- I think it was a ninth grade English, if I
8 recall.

9 Q. Gotcha. What grade levels for drama and
10 journalism?

11 A. Nine through 12.

12 Q. Nine through 12. Okay.

13 MR. SAFIER: I'd like to mark this as
14 Exhibit 3.

15 (Baggett Exhibit 3 was marked for identification.)

16 BY MR. SAFIER:

17 Q. And let me know when you are ready to talk
18 about this.

19 A. Okay.

20 Q. Do you recognize Exhibit 3?

21 A. Yes.

22 Q. Is this a challenge form you filled out for the
23 book "Perks of being a Wallflower"?

24 A. Yes.

25 Q. And then if you look at the very bottom, there

Deposition of Victoria G. Baggett

1 is handwriting. Is that your handwriting?

2 A. Yes, it is.

3 Q. And it says -- let's see. The first of the two
4 handwritten places it says: Initially submitted this
5 book on 5/20/22.

6 Did I read that right?

7 A. Yes.

8 Q. So am I correct in understanding that you
9 submitted this challenge on May 20th, 2022?

10 A. That is the assumption.

11 Q. Okay.

12 A. Yes.

13 Q. Am I right that this is the first book
14 challenge you ever submitted?

15 A. Yes.

16 Q. Okay.

17 A. I was looking at the dates. Yes, uh-huh.

18 Q. So this is May 2022. I think we established
19 that you taught in Escambia since 1999, correct?

20 A. Correct.

21 Q. So at this point you had been teaching in
22 Escambia for 23 years, correct?

23 A. Yes.

24 Q. So what moved you in May 2022 to all the sudden
25 file a book challenge?

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1 A. This particular book was sent to me as -- to be
2 optionally used as a classroom novel set.

3 Q. Who sent it to you?

4 A. The English department of my school district.

5 Q. Okay. At the time that you submitted this
6 challenge, were you aware of other efforts to remove
7 books from libraries in other places?

8 A. Not necessarily, no.

9 Q. What do you mean not necessarily?

10 A. I mean I -- this was two years ago, three years
11 ago. I don't -- I do not think so, no. That was not --
12 no.

13 Q. Okay. Prior to making this first book
14 challenge, did you speak with anyone about challenging
15 books in libraries?

16 A. No, not that I recall.

17 Q. Okay. Prior to making this first book
18 challenge, did you consult any websites that identified
19 books that might be objectionable?

20 A. Prior to making the challenge?

21 Q. This challenge.

22 A. I do not recall that.

23 MR. SAFIER: Okay. I'd like to mark this as
24 Exhibit 4.

25 (Baggett Exhibit 4 was marked for identification.)

Deposition of Victoria G. Baggett

1 (Discussion off the record.)

2 BY MR. SAFIER:

3 Q. Let me know when you've had a chance to review
4 this.

5 A. Okay.

6 Q. Am I correct that this is an appeal form that
7 you filed for the book "Perks of being a Wallflower"?

8 A. Yes.

9 Q. And you filed this on October 5th, 2022,
10 correct?

11 A. October 4th, I think.

12 Q. Oh, I'm just getting the date from the --

13 A. Okay.

14 Q. That you sent the e-mail, but you think it
15 might be October 4th?

16 A. Yes, after this, yes. This is additional
17 appeal material.

18 Q. Oh, I see what you're saying. Thank you.

19 A. Uh-huh.

20 Q. Okay. So looking at the first page of this
21 document, do you see there's a paragraph numbered 1?

22 A. Yes.

23 Q. And I'm going to read just the last three
24 sentences of this paragraph to you, starting with "why
25 then." Do you see where I am?

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1 A. Uh-huh.

2 Q. Why then would a district offer a controversial
3 book as such to someone in this situation, and because
4 it's happening all throughout our district, we have the
5 book for classroom usage at all. There are so many
6 others from which to choose. This book is currently
7 removed or under investigation in so many states and
8 districts because of sexual obscene content, including
9 references to bestiality. Can our country [sic] really
10 afford to put ourselves in the position that many of our
11 neighboring counties have found themselves in regarding
12 this book and others like it.

13 Did I read that accurately?

14 A. Uh-huh.

15 Q. So I want to ask you about one sentence. So
16 one of the sentences I read is: This book is currently
17 removed or under investigation in so many states and
18 districts.

19 Why did you include that sentence in this?

20 A. Why wouldn't I?

21 Q. Who was your -- how did you become aware that
22 this book, books -- or "Perks of a Wallflower" had been
23 removed or under investigation in places other than
24 Escambia County?

25 A. Because after I read the book and had met and

Deposition of Victoria G. Baggett

1 sent numerous e-mails about something needs to be done
2 with this book, nothing was -- you know, there was no
3 movement, it was like it was unimportant, and so at that
4 point, of course, you know, I start trying to figure out
5 how can I get my school district aware that this book is
6 age and content inappropriate.

7 So, obviously, that's what I started doing, I
8 started researching the book.

9 Q. So you researched whether the book was being
10 challenged in other places in the country, correct?

11 A. I researched the content of the book and then
12 that's when I found out that the book was being
13 challenged.

14 Q. Okay.

15 A. That's where.

16 Q. I want to move now to Paragraph 4 of this first
17 page. The first sentence reads: The parental book
18 rating for this book is 4 of 5, meaning it is not for
19 minors.

20 Did I read that correctly?

21 A. Yes.

22 Q. What is the book rating that you're referring
23 to here?

24 A. Obviously, that is the book rating that was
25 given on the book that I found, the content rating that

Deposition of Victoria G. Baggett

1 I found on various book sites after I researched the
2 book, after I had already submitted the form.

3 Q. Do you know in particular where that rating 4
4 out of 5 came from?

5 A. I do not, ung-ugh.

6 Q. And if you look at -- do you see starting with
7 the -- first, second, third, fourth, fifth -- the fifth
8 page of this document, where there is Attachment 2, do
9 you see that?

10 A. Yes.

11 Q. Here you have excerpts from this book, correct?

12 A. Yes.

13 Q. Where did you find these excerpts?

14 A. That was one of those book sites.

15 Q. So these excerpts are taken from that book
16 site?

17 A. Yes.

18 MR. SAFIER: I'd like to mark this document
19 as -- can I go off the record for one second?

20 THE VIDEOGRAPHER: Yes. Stand by. Going off
21 the record. The time is 9:50 a.m.

22 (Recess from 9:50 a.m. until 9:51 a.m.)

23 THE VIDEOGRAPHER: We are back on the record.
24 The time is 9:51 a.m.

25 MR. SAFIER: Okay. I'd like to mark this as

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1 Exhibit 5.

2 (Baggett Exhibit 5 was marked for identification.)

3 BY MR. SAFIER:

4 Q. And let me know when you've had a chance to
5 review it.

6 A. Yes.

7 Q. Do you recognize this document?

8 A. Absolutely.

9 Q. What is it?

10 A. This is a document that when parents and
11 concerned citizens have come to me and said where can we
12 find books that have been challenged in our county,
13 where can we find information or content within those
14 books, this is something that I typed up and gave them.

15 Q. Okay. So if you would look at the paragraph
16 numbered 3, it reads: To see some sample book reviews,
17 go to www.booklooks.org or www.ratedbooks.org.

18 Did I read that correctly?

19 A. Yes.

20 Q. What is Book Looks?

21 A. That is a place where people can go and see
22 content materia, but then, of course, look at my next
23 sentence: It is important to read the book and have
24 state and federal laws to compare to see if you feel the
25 book is inappropriate.

Deposition of Victoria G. Baggett

1 Q. All right. So Book Looks is a site that
2 identifies books that might be objectionable; is that
3 correct?

4 A. Yes.

5 Q. How did you find Book Looks?

6 A. After this particular -- this first book
7 situation in May, which led into August, which led into
8 October of '22, that's how I came across Book Looks and
9 rated books, when I searched for information about that
10 book.

11 Q. And if you could look back at Exhibit 4,
12 remember when we saw excerpts from that book that you
13 included?

14 A. Yes.

15 Q. Do you think that was taken from Book Looks?

16 A. It certainly could have been.

17 Q. But you don't know --

18 A. I'm just -- I'm just not sure.

19 Q. Sure. Understood. Do you have any affiliation
20 with the website Book Looks?

21 A. Affiliation? No. I go to it and I know that,
22 you know, they do work trying to get the information
23 out. There are a lot of the people who are associated
24 with those websites who come to me and ask to be -- ask
25 to use some of my findings on their site, and I gladly

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1 let them.

2 Q. What websites have come to you with that kind
3 of request?

4 A. Like Book Looks and Rated Books ask if they
5 could share information of my reviews on books that they
6 can share.

7 Q. Do you know anyone personally who is involved
8 with the Book Looks website?

9 A. Personally, no.

10 Q. Through e-mail or otherwise?

11 A. They may have e-mailed me but I don't even
12 know -- I mean, I don't -- no. I mean, I don't care.
13 You know what I'm saying? This is just -- it's just a
14 website.

15 Q. So if I were to ask you for a name of someone
16 affiliated with the website, you couldn't give me a
17 name?

18 A. There are a lot of websites -- I don't think
19 that I could. There's one woman who is associated with,
20 I think, Book Looks, but I don't even know if it's her
21 website. I don't know.

22 Q. Is the woman you're thinking of Michelle
23 Beavers?

24 A. I don't know if she's a -- I do know that name.

25 Q. Okay.

Deposition of Victoria G. Baggett

1 A. But I do not know that she's associated with
2 that, but I do know that name.

3 Q. Who is -- so getting -- we'll get to Michelle
4 Beavers in a second, but is there some name you were
5 thinking of when you said "I don't know if she's
6 associated with Book Looks"?

7 A. Well, there is a name that I know but I think
8 that she's a person who constantly tries to get the word
9 out through various websites.

10 Q. What's that person's name?

11 A. Her name is Irish.

12 Q. Irish?

13 A. Uh-huh.

14 Q. Anything else, first name, last name?

15 A. I don't know her first name. I think Irish is
16 her last name.

17 Q. Gotcha. I had to ask. So getting back to
18 Michelle Beavers, do you know who she is?

19 A. Not really. I do know her name.

20 Q. Gotcha.

21 A. And she -- I think she may even be my friend on
22 social media, but I don't -- I know that she's a warrior
23 in this quest to clean up what we're exposing minors to.

24 Q. Do you consider her an ally?

25 A. I don't know. I don't know her personally so I

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1 can't -- I don't consider her an enemy, you know.

2 Q. Fair enough. So the other website in addition
3 to Book Looks that's referenced in the document we
4 marked as Exhibit 5 is ratedbooks.org. Can you tell me
5 what that is?

6 A. It's kind of like Book Looks, and these are --
7 you know, they're very limited but they're -- I think
8 that they're important because they allow parents and
9 citizens to see some portions of books and then they can
10 decide, hey, do I need to go read these, but it's the
11 same sort of thing as Book Looks.

12 Q. And do you know the name of anyone affiliated
13 with that website?

14 A. Not that I recall, no.

15 Q. Do you know if either website is affiliated
16 with Moms for Liberty?

17 A. I do not know.

18 MR. SAFIER: I'd like to mark this as
19 Exhibit 6.

20 (Baggett Exhibit 6 was marked for identification.)

21 BY MR. SAFIER:

22 Q. Let me know when you're ready to talk about
23 this document.

24 A. Okay.

25 Q. Yes, ready?

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1 A. Yes.

2 Q. Okay. Am I correct that this is part of your
3 response to the document subpoena that we served on you?

4 A. Yes.

5 Q. Okay.

6 A. It's very small print, so don't ask me to read.

7 Q. I'm just going to ask -- I'm going to ask about
8 the big print part, so that will make it easier.

9 A. Okay.

10 Q. So there is a part here that says "Response to
11 Request #7" and then there is some words again in big
12 print. Am I correct that those are your words --

13 A. Yes.

14 Q. -- that you wrote in response to our subpoena?

15 A. Yes.

16 Q. Okay. So I will read it out. It says: I
17 don't know the membership registry for members of Moms
18 for Liberty because I'm not a member myself, and anyone
19 is invited to their meetings. I am aware of one
20 official member. Here are a few e-mails I have sent to
21 her in a group e-mail. I did not save these since the
22 communications are not related to an Escambia County
23 School.

24 Did I read that correctly?

25 A. Yes.

Deposition of Victoria G. Baggett

1 Q. Who is the one official member you're referring
2 to in this explanation?

3 A. Her name is Mariya.

4 Q. And does she have a last name?

5 A. Calkins.

6 Q. How do you know her?

7 A. I met her at a school board meeting in Santa
8 Rosa County when I went to bring up some books that I
9 had found in a library.

10 Q. Okay. And when was that, roughly?

11 A. A year ago maybe.

12 Q. So it would have been after your first book
13 challenge, correct?

14 A. Oh, yes.

15 Q. Have you attended any Moms for Liberty
16 meetings?

17 A. Yes.

18 Q. When did you attend your first Moms for Liberty
19 meeting?

20 A. Probably in the summer of '23.

21 Q. So again, after you started challenging books
22 in Escambia County?

23 A. Yes.

24 Q. Why did you attend the meeting of Moms for
25 Liberty?

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1 A. Because they heard me speak at a school board
2 meeting.

3 Q. And they invited you?

4 A. Yes.

5 Q. What did you speak about at the meeting?

6 A. How I first found this particular book to be
7 content inappropriate and so forth.

8 Q. And by this particular book, you're referring
9 to "Perks of Being a Wallflower"?

10 A. Yes.

11 Q. How many meetings have you attended for Moms
12 for Liberty?

13 A. I've only attended the ones that I've been able
14 to attend or when they have a guest who has interesting
15 information that I would like to -- maybe three.

16 Q. Are you a member of that organization?

17 A. No.

18 Q. Do you receive e-mails or communications from
19 that organization?

20 A. No.

21 Q. Do you subscribe to any newsletters that they
22 generate or anything like that?

23 A. No, although I wouldn't mind doing that. I
24 just haven't had time.

25 Q. Fair enough. So I think we may have covered it

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1 but I just want to make sure we've tied a bow on this.
2 You've gone to a few Moms for Liberty's meetings that we
3 discussed.

4 A. Uh-huh.

5 Q. And there's these e-mail chains.

6 MS. REGAN: Answer with a yes or a no, please.

7 A. Oh, yes.

8 MR. SAFIER: Thank you. Sorry about that.

9 A. Yes. I'm sorry.

10 Q. And then these e-mails exchanges we discussed
11 with Mariya Calkins. Are there any other interactions
12 with Moms for Liberty that you've had other than the
13 ones we've discussed?

14 A. Just the meetings and -- yeah, that's it.

15 Q. Are you -- do you participate in a listserv for
16 Moms for Liberty?

17 A. No. They have a Moms for Liberty Facebook page
18 that I certainly, you know, sometimes go to and also
19 share information, especially book challenges.

20 Q. And how frequently do you go to it?

21 A. Once every three weeks maybe.

22 Q. And when did you start visiting that Facebook
23 page?

24 A. When I met them.

25 Q. Okay. And that, again, summer of 2023, you

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1 think?

2 A. Yes. Uh-huh.

3 MR. SAFIER: I'm going to mark this as

4 Exhibit 7.

5 (Baggett Exhibit 7 was marked for identification.)

6 BY MR. SAFIER:

7 Q. Let me know when you're ready to talk about
8 this.

9 A. Okay.

10 Q. Do you recognize this document?

11 A. This looks like something -- yeah, this looks
12 like something that's on some of the -- like the Book
13 Looks and stuff like that. Oh, LaVerna in the Library.

14 Q. Okay. What is LaVerna in the Library?

15 A. That's another one of the -- like the book
16 challenges type and for content information sites.

17 Q. So this is a place you go to for information
18 about books that might be objectionable?

19 A. I don't -- I do not have to go to these places
20 because I do my own research, but it's definitely there
21 for anyone who wants to, so yes, I am aware of this
22 site.

23 Q. Are you a member of the Facebook page
24 affiliated with this organization?

25 A. I go to the Facebook page, yes.

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1 Q. How frequently?

2 A. Maybe once a month, sometimes once a week. It
3 depends on if -- you know, what they -- what news they
4 have.

5 Q. Gotcha. Are you familiar with something called
6 Florida Citizens Alliance?

7 A. Yes, I've heard of that.

8 Q. What is it?

9 A. I believe that it's a group who advocates for
10 rights -- I don't want to incorrectly speak. I mean,
11 rights of parents maybe, rights of citizens.

12 Q. Do you have any -- do you have any affiliation
13 with that organization?

14 A. I do not think that I do.

15 Q. Have you gone to any of their events?

16 A. No.

17 Q. Are you familiar --

18 A. If I did, if I -- if I had been to, I think
19 that I would remember that, so I...

20 Q. Are you affiliated with a group called No Turn
21 Left in Education?

22 A. Yes.

23 Q. What is that?

24 A. That is also a group that prepares and shares
25 documents to parents and others.

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1 Q. And is it a Florida-specific organization?

2 A. I don't think it is, no.

3 Q. I should have asked this, going back. Is Book
4 Looks a Florida organization, do you know?

5 A. I do not know.

6 Q. Is --

7 A. I do not know if any of those are.

8 Q. Okay.

9 A. Yeah.

10 Q. I just want to -- yeah.

11 A. It's -- from what I can gather, it's like a
12 database where people share, you know, information.

13 Q. And that's -- so No Turn Left in Education is a
14 database, or are you talking about all these groups?

15 A. Yeah, I mean, it's like -- it's the same thing,
16 it's the same sort of thing as the other.

17 Q. So focusing just on No Turn Left in Education,
18 can you just explain to me what that is?

19 A. What it is?

20 Q. Yeah. What the org -- what the -- is it a
21 website, is it an organization?

22 A. It's a website. It's just like these others.
23 It's --

24 Q. Oh, so it's a place where you find books that
25 might potentially be objectionable?

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1 A. Where if a parent or a citizen has found a book
2 that maybe their child has brought home and it contains
3 age-inappropriate content, then the parent will share
4 the book on the website.

5 Q. How frequently do you visit that website?

6 A. No Left Turn?

7 Q. Yeah.

8 A. I don't even know if I'm a member of the
9 Facebook page but maybe I am. Probably about the same.

10 Q. Okay.

11 A. Once a month.

12 Q. And I probably should have asked this but are
13 you a member of the LaVerna group Facebook page?

14 A. When you say member, I mean, it just means
15 you're following, so yes.

16 Q. Okay. And are you a member for the Moms for
17 Liberty Facebook page, again meaning just following?

18 A. Yes. Uh-huh.

19 Q. Does Book Looks have a Facebook page?

20 A. Book Looks is a website. I don't think they
21 have a Facebook page.

22 Q. I figured I would ask. Okay.

23 A. I'm not sure.

24 MR. SAFIER: I would like to mark this as
25 Exhibit 8.

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1 (Baggett Exhibit 8 was marked for identification.)

2 MS. REGAN: Thank you.

3 BY MR. SAFIER:

4 Q. And let me know when you are ready to talk
5 about it.

6 A. Okay.

7 Q. So at the very bottom there is an e-mail you
8 sent on August 29th, 2022, to someone named Davina; is
9 that correct?

10 A. Yes.

11 Q. And that's Davina Carroll?

12 A. Yes.

13 Q. Who is Davina Carroll?

14 A. Davina Carroll was married to my stepbrother.
15 She's the former librarian at Jay Elementary.

16 Q. Gotcha. And just looking at the next page, you
17 see, moving on to Page 3 of the document, you see
18 starting at the document that bears the number 0064338,
19 a large list of books, correct?

20 A. Yes.

21 Q. And these are books that you've challenged in
22 Escambia County School District, correct?

23 A. Yes, and I've read.

24 Q. And there are 116 books listed here, correct?

25 A. Yes.

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1 Q. But you've challenged more than 116, correct?

2 A. I don't know the number that I've challenged.

3 Q. But it's more --

4 A. I'm not the only one challenging books.

5 Q. Oh, sure, absolutely. But is it more than 116?

6 A. I would assume.

7 Q. Okay.

8 A. Sadly.

9 Q. You've talked a little bit about this, but how
10 do you go about finding specific books to challenge?

11 A. It is very easy at this point because people
12 bring them to me or people will -- I had somebody to
13 leave about 15 books on my front porch recently. It's
14 not difficult but, really, all that one has to do is to
15 go to a library and start looking at books, especially
16 those that have been published after 2020, because I
17 have seen just in my own research that those are -- seem
18 to be more graphic.

19 Q. In identifying books to challenge, do you
20 consult lists of books that have been challenged
21 elsewhere?

22 A. Not necessarily, no.

23 Q. I mean ever.

24 A. I don't -- I mean, sometimes I do but more than
25 most of the time I do not.

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1 Q. Okay. Most of the time you do not. But you
2 have done it?

3 A. I have done that, sure.

4 Q. What about Book Looks, do you look at Book
5 Looks, find a book and say that's worthy of a challenge?

6 A. Refer to my previous answer.

7 Q. Okay. Fair enough.

8 A. I visit Book Looks about once or twice a month.

9 Q. Right. But my question is do you visit Book
10 Looks to find books that you then challenge?

11 A. That I've already challenged?

12 Q. No, no. That you then -- you find it on Book
13 Looks and you say --

14 A. Oh.

15 Q. -- "Aha, that's a book I'm going to challenge."

16 A. Not --

17 Q. Does that ever happen?

18 A. No, no, I don't have to. I did. I did when I
19 first found out about Book Looks and I saw some of these
20 books and then I saw the names of the books and I
21 would -- you know, I'm like, "Surely we don't have this
22 book in our library," and, sadly, we did.

23 Q. So just for --just for clarity, just so I'm
24 understanding this correctly, at least for some of your
25 challenges you would find a book on Book Looks --

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1 A. Not necessarily Book Looks, yeah, it would
2 be --

3 Q. Or -- Book Looks or a site like Book Looks, and
4 we talked about a bunch of sites.

5 A. It could be at Books-A-Million.

6 Q. Okay. Can I --

7 A. Yeah. I would find books, period, and then
8 challenge them.

9 Q. So I'm going to try to get out my question.
10 So, just for clarity, you would go to websites.
11 At least occasion -- or sometimes in the challenge
12 process, the way you would find a book is you would see
13 it on a website like Book Looks or Book Looks and you
14 would then go to the catalog for Escambia to see if it
15 was in Escambia and then file a challenge; is that -- is
16 that correct, that has happened?

17 MS. SMITH: Objection to form.

18 Q. You can answer.

19 A. After I would read the book myself.

20 Q. Sure. But my question is just you would
21 initially find the book on a website like Book Looks,
22 correct?

23 MS. SMITH: Objection; form.

24 A. Every once in a while.

25 Q. Okay.

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1 A. Yes.

2 Q. Can you tell me, roughly -- and I recognize you
3 can't be specific here, but how often that happened?

4 A. Maybe -- because, I mean, I don't even know how
5 many books that I have found per month but maybe one
6 book a month.

7 Q. Okay. You know, we've talked about a bunch of
8 websites. Are there any other websites other than the
9 ones we've discussed that you will find books to
10 potentially challenge on?

11 A. No.

12 Q. Okay.

13 A. Not that I can recall.

14 Q. Okay. Do you -- and I think you testified to
15 this earlier but I just want to make sure. Is it your
16 position that you will sometimes just go to libraries
17 and find books and pull them off the shelf and start
18 reading them and that will lead to a challenge?

19 A. Absolutely.

20 Q. Okay. Can you identify a specific book where
21 that was the process?

22 A. "Maestro."

23 Q. Say that again.

24 A. I just found a book called "Maestro" last -- I
25 remember this specifically last summer. I went to a

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1 Friends of the Library book sale and there was a book in
2 the juvenile section called "Maestro" and I got the
3 book, started flipping through it. It had graphic
4 pictures of people having sex, and I then went to our
5 Destiny catalog and, unfortunately, Escambia County had
6 that book available in the high school library. So I
7 finished reading the book and submitted the challenge on
8 that book.

9 Q. Can you identify any other books where that was
10 the sequence?

11 A. I could give you book after book after book,
12 you know. I just --

13 Q. But just in recognizing that memories are what
14 they are, the only one that comes to mind right now is
15 "Maestro"?

16 A. Oh, no. Stephen King books, yeah.

17 Q. Which Stephen King books?

18 A. Let's see. Recently, I think I've submitted
19 "Bag of Bones," I believe. I could -- let me look at
20 this list and I can tell you some. I live at the
21 library.

22 Q. I thought you told me your address was
23 different.

24 A. Let's see. "From Blood and Ash."

25 Q. How did you find that book?

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1 A. At the public library.

2 Q. So you went to the municipal library and found
3 it?

4 A. The public library, uh-huh. "Tricks" by Ellen
5 Hopkins, same thing.

6 Q. Municipal public library?

7 A. Uh-huh, the public library close to where I
8 live.

9 Q. What's that called?

10 A. It's just the Century Public Library.

11 Q. Thank you.

12 A. "Lessons from a Dead Girl."

13 Q. How'd you find that?

14 A. That was in our -- I believe that was in my
15 school library and I found that one on the shelf, yeah.
16 So a lot of these, you know, I just find in the
17 libraries.

18 MR. SAFIER: I'd like to mark this as
19 Exhibit 9.

20 (Baggett Exhibit 9 was marked for identification.)

21 BY MR. SAFIER:

22 Q. Have you had a chance to review?

23 A. Yes.

24 Q. Exhibit 9 is a challenge form you filled out,
25 correct?

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1 A. Yes.

2 Q. And it was for the book "When Wilma Rudolph
3 Played Basketball," correct?

4 A. Yes.

5 Q. And it's your position that that book should
6 not be in elementary schools in Escambia County --
7 elementary school libraries in Escambia County?

8 A. I just wanted the review committee to look at
9 this book, yes, because I'm just a firm believer that
10 nobody should be made to feel less than any other race.

11 Q. Okay. So your -- just to clarify your answer,
12 your view is yes, this book should not be in elementary
13 school libraries in Escambia County, that is your
14 position?

15 A. Yes.

16 Q. Okay. And if you look at reasons for
17 objection, you wrote: Opines prejudice based on race.
18 Correct?

19 A. Yes.

20 Q. What did you mean by that?

21 A. Well, just as some other books that I also
22 submitted based on race, if I recall, and this has been
23 two years, this book was like White shaming, and
24 elementary students, of course, they're inexperienced
25 and may not know how to accept that. We don't want any

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1 race to feel ashamed of color.

2 Q. Is it your recollection that this book
3 describes Wilma Rudolph's experience growing up in the
4 Jim Crow South?

5 A. Yes.

6 Q. What about that is inappropriate for elementary
7 school students?

8 A. Again, it was based on 1557, like race shaming.
9 This was not the only book that I submitted for race
10 shaming. There were others based on the way that Jewish
11 students were treated, the way that Black students were
12 treated, White students were treated, Asian students
13 were treated.

14 Q. And is it the depiction of the Jim Crow South
15 that makes it a race-baiting book?

16 MS. SMITH: Objection; form.

17 A. No. It was, I think -- I believe that it was
18 the way that she -- I believe that this book was
19 age-inappropriate for a young child to understand as far
20 as making a child feel ashamed for being a particular
21 color. We can't help what race we are.

22 Q. So hold onto that for a second. I want to show
23 you another document.

24 MR. SAFIER: I'd like to mark this as
25 Exhibit 10.

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1 (Baggett Exhibit 10 was marked for identification.)

2 BY MR. SAFIER:

3 Q. And take as long as you need to review this
4 document.

5 A. Okay.

6 Q. Have you ever seen this before?

7 A. I've never seen this document.

8 Q. Do you agree with me that just looking at the
9 cover and looking at what's in the bottom left-hand
10 corner, that this appears to be an NBC News publication?

11 A. That's what it says here.

12 Q. And the title of the article is "Here are 50
13 books Texas parents want banned from school libraries."

14 Did I read that correctly?

15 A. Yes.

16 Q. If you look at the next page, the date is
17 February 1st, 2022, correct?

18 A. Yes.

19 Q. In looking back at the challenge you filled out
20 for the Wilma Rudolph book, that was dated August 24th,
21 2022, correct?

22 A. Yes.

23 Q. So your challenge -- your challenge to the
24 Wilma Rudolph book came out after this article was
25 published, correct?

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1 A. In writing, yes.

2 Q. Okay. Fair enough. So if you look at the
3 third page of this document, there's an entry for "When
4 Wilma Rudolph Played Basketball." Do you see that?
5 Right there.

6 A. Oh, yes.

7 Q. At the very bottom. I'm sorry. And then if
8 you turn to the next page, there's a description and I'm
9 going to read that out. It reads: A parent in Prosper,
10 a Dallas suburb, said this illustrated children's book
11 which touches on the racism that Olympian Wilma Rudolph
12 experienced growing up in Tennessee in the 1940s, should
13 be removed from school libraries because it quote --
14 because, quote, "it opines prejudice based on race."

15 Did I read that correctly?

16 A. Uh-huh.

17 Q. Those are the same words you used in your
18 challenge form, right?

19 A. Looks like it.

20 Q. Do you know how that happened?

21 A. I do not.

22 Q. So you had not -- you did not look at the Texas
23 challenge form before you filled out your challenge
24 form?

25 A. I do not recall looking at the Texas challenge

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1 one. This is the first time I've seen this.

2 Q. Can you look at the front page of the document
3 that we marked as Exhibit 10?

4 A. Yes.

5 Q. Do you recognize, just looking at the cover,
6 some other books that you've challenged from this cover?

7 A. I do. I see several, uh-huh.

8 Q. Can you name them all?

9 A. I see -- you mean some that I recognize?

10 Q. The books that are depicted on this cover that
11 you recall challenging in Escambia County.

12 A. I see "Gender Queer." I see "Drama." I see
13 "Flamer." I see "All Boys Aren't Blue." I'm not sure
14 if we challenged these -- if these that have been listed
15 as being challenged are from me or from other people,
16 but I'm familiar with those books that have been
17 challenged.

18 Q. Gotcha.

19 A. I see "Breakaways."

20 Q. When you say -- you used the phrase "we
21 challenged." Who are you referring to there?

22 A. I'm referring to other people who also submit
23 forms.

24 Q. Gotcha.

25 MR. SAFIER: I'd like to mark this as

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1 Exhibit 11.

2 A. I also see some that I do not recognize in that
3 as well.

4 (Baggett Exhibit 11 was marked for identification.)

5 BY MR. SAFIER:

6 Q. Am I correct that Exhibit 11 is a challenge
7 form you filled out for the book "The Freedom Writers
8 Diary"?

9 A. Yes.

10 Q. Okay. And I just want to ask you about
11 Number 4 in your entry. The question for 4 is: Are you
12 aware of the judgment of this educational media by
13 literary and authoritative critics?

14 And you wrote: Yes; already banned in many
15 districts.

16 Did I read that correctly?

17 A. Yes.

18 Q. What was your basis at this time, when you
19 filled this out, for knowing this book had already been
20 banned in many districts?

21 A. When I filled this out, as well as other forms,
22 the handwritten forms that I first submitted, it was my
23 understanding there had never been a challenge in our
24 school district. As a matter of fact, you see how
25 pitiful the form is. And so this is why these are all

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1 handwritten and they're all very similar, and they were
2 all submitted at one time, as a matter of fact. That's
3 why the dates were the same. However, a lot of those I
4 had been working on but they were all submitted at one
5 time, but that book, I remember reading that book. It's
6 been a while, two -- definitely -- almost two years
7 and -- two-and-a-half years ago almost.

8 Yes, that's one of those books that I saw, when
9 I researched that book, that it was already being pulled
10 in a lot of districts, too.

11 Q. And in your mind, what's the significance of
12 the fact that it's already been pulled in a bunch of
13 other districts?

14 A. Why are we repeating the same steps? I mean,
15 if we've got a problem in one district, couldn't we
16 eliminate things if we work together to -- and save a
17 lot of time to come up with a solution in other
18 districts. That's why.

19 Q. And other districts, are you referring to other
20 districts in Florida or other districts throughout the
21 country?

22 A. Other districts in Florida.

23 Q. So let me finish. Just other districts in
24 Florida or other districts throughout the country?

25 A. My -- I'm sorry about that. My concern is

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1 Florida. Now, don't get me wrong, this is a universal
2 problem, what's going on, but, you know, Florida -- I'm
3 a teacher in Florida, so Florida is my concern right
4 now.

5 MR. SAFIER: I'd like to mark this as
6 Exhibit 12.

7 (Baggett Exhibit 12 was marked for identification.)

8 BY MR. SAFIER:

9 Q. So this -- am I correct that this is a
10 challenge form you filled out for the book "The Haters"?

11 A. Yes.

12 Q. And in this form you likewise answered under
13 Question 4: Yes; already banned in many districts.
14 Right?

15 A. Yes.

16 Q. And just so I'm understanding correctly, the
17 process is you would find a book and then research it
18 and if you found that it was banned in other places, you
19 would note that on the form; is that right?

20 A. Not necessarily.

21 Q. But you did sometimes?

22 A. No -- yes, obviously.

23 Q. Sure.

24 A. Yes, I didn't remember doing that, but yes.

25 Q. Okay. All right.

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1 MR. SAFIER: I'd like to mark this as
2 Exhibit 13.

3 (Baggett Exhibit 13 was marked for identification.)

4 BY MR. SAFIER:

5 Q. Let me know when you're ready.

6 A. Okay. Thank you.

7 Q. So this is an e-mail that you sent on
8 July 21st, 2003 [sic], correct?

9 A. Yes.

10 Q. I want to ask about the substance but first I
11 want to ask about who you sent it to. Very quickly, who
12 is Keith Leonard?

13 A. Superintendent for Escambia County, Florida.

14 Q. And who is Bradley Vinson?

15 A. She is the Library Media Director for Escambia
16 County, Florida.

17 Q. And who is William Slayton?

18 A. Board member.

19 Q. Who is Shenna Payne?

20 A. Assistant superintendent.

21 Q. Who is Kevin Adams?

22 A. Board member.

23 Q. I know the answer to this question but I'll ask
24 anyway. Who is Governor Ron DeSantis?

25 A. Governor of Florida.

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1 Q. Who is Michelle Salzman?

2 A. A representative for Florida.

3 Q. Is she your representative?

4 A. Yes.

5 Q. Who is David Williams?

6 A. Board member.

7 Q. Who is Manny Diaz?

8 A. Commissioner of Education.

9 Q. Who is Paul Fetsko?

10 A. Board member.

11 Q. Who is Patricia Hightower?

12 A. Board member.

13 Q. Okay. Just looking -- I will ask more
14 questions in a second, but looking at your e-mail,
15 you're proposing a change to the challenge form used in
16 Escambia County, correct?

17 A. Yes.

18 Q. Okay. Why did you copy the Governor of Florida
19 on this e-mail?

20 A. Because I have absolutely nothing to hide. I
21 think that when people -- I know -- and I'm speaking
22 from experience. When I started reading some of these
23 sexually graphic books, it was abhorrent, and once you
24 can see that a book is definitely in violation of 847,
25 why must the reviewer keep reading the book.

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1 So -- and so many people were asking this same
2 thing, because the books were -- it does something to
3 you, what you're putting in your thought process, so
4 that was the suggestion.

5 Q. Right. That's the substance of your e-mail,
6 and I want to ask you about that in a second. My
7 question was lightly different. Why was -- why did you
8 copy Governor Ron DeSantis on this e-mail?

9 A. I always did, on just about every e-mail that I
10 ever sent.

11 Q. Why is that?

12 A. Because I had nothing to hide. I did it -- I
13 started doing that from the get-go and so I just kept it
14 up.

15 Q. So from the get-go, you mean when you started
16 doing book challenges --

17 A. Yes.

18 Q. -- you would copy the governor's office on
19 every challenge?

20 A. Yes, because I wanted them to see the types of
21 books that were being found available to our minors in
22 our public school libraries.

23 Q. Would the governor respond to e-mails?

24 A. A simple response, the typical -- it was like
25 an automated response: We receive so many e-mails.

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1 We'll get back to you shortly.

2 Q. Did you ever receive any more direct --

3 A. No.

4 Q. Let me finish. Sorry.

5 A. I'm sorry. I apologize.

6 Q. No, it's my fault and I should have explained
7 this more clearly.

8 A. I'm sorry.

9 Q. For the record to be clean, I need to finish --

10 A. I apologize.

11 Q. -- asking a complete question and you answer.

12 A. I'm trying. I'm trying.

13 Q. You're doing a great job, and I appreciate this
14 is no fun, so I -- you've been a great sport. So let me
15 ask my question.

16 Has Governor DeSantis or anyone from Governor
17 DeSantis's office ever responded substantively to any
18 of --

19 A. No.

20 Q. -- the e-mails you've sent? Sorry. We almost
21 did it.

22 A. No.

23 Q. The e-mails as sent?

24 A. No.

25 Q. No is your answer. Okay. Thank you.

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1 A. I'm sorry. I'm sorry.

2 MS. REGAN: Don't step on his words, if you can
3 help it.

4 Q. Is it your understanding that he's supportive
5 of what you're doing?

6 A. I would hope so. I think so. I think so.

7 Q. What's your basis for that belief?

8 A. We have laws in place hopefully to protect our
9 children. I think they definitely need to be. You
10 know, spruced up and clarified so that there is no
11 wiggle room and everybody will be on the same page.

12 Q. And what about Representative Salzman's office,
13 does she or her office ever respond substantively to
14 your e-mails?

15 A. No.

16 Q. Do you think she supports what you're doing?

17 A. I assume so.

18 Q. Why do you assume so?

19 A. She has never indicated one way or the other.
20 I mean, I -- she has -- she's in my local area, so I'm
21 hoping that she does, but I wouldn't know one way or the
22 other.

23 Q. What about Manny Diaz?

24 A. Same thing.

25 Q. So he or his office has not responded to you

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1 substantively?

2 A. No.

3 Q. Do you think he supports what you're doing?

4 A. I have no way of knowing.

5 Q. Okay. So getting back to the substance of your
6 e-mail, and I think we talked about this earlier, what
7 you're proposing here is that someone who submits a book
8 challenge doesn't have to attest that he or she read the
9 whole book, correct?

10 A. Correct.

11 Q. And are you making that request for all books
12 or only some books?

13 A. The sexually graphic and those types of books.

14 Q. Do you think it's necessary to read a book in
15 full to assess whether it has literary or artistic
16 merit?

17 A. I do not.

18 Q. And do you feel that way about all books?

19 A. Yes, actually, I do.

20 Q. But your position today is that you do in fact
21 read all books cover to cover --

22 A. I read -- I --

23 Q. Let me finish.

24 A. I'm sorry.

25 Q. You do in fact read all books cover to cover

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1 when you submit book challenges, correct?

2 A. Yes.

3 Q. Okay.

4 A. I'm trying.

5 Q. You're doing a great job. I'd like to mark
6 this as Exhibit 17 -- 14.

7 MS. REGAN: 14.

8 MR. SAFIER: 14. Sorry. I'm not so good with
9 the counting.

10 (Baggett Exhibit 14 was marked for identification.)

11 BY MR. SAFIER:

12 Q. And take as much time as you need to review.

13 A. Okay.

14 Q. This is a appeal packet you submitted in
15 connection with the book "The Absolutely True Diary of a
16 Part-Time Indian." Correct?

17 A. Yes.

18 Q. And if you turn to -- if you turn to the fourth
19 page, do you see where it lists excerpts of books?

20 A. Yes.

21 Q. And those are excerpts you've pulled out of the
22 book as something you wanted the committee to review,
23 correct?

24 A. Yes.

25 Q. And do you think that you got this from Book

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1 Looks?

2 A. I don't know.

3 Q. Is it possible you did?

4 A. It's possible.

5 Q. Okay. And I'll just -- not to hide the ball --

6 A. Yes, it's just page numbers and content.

7 MR. SAFIER: I'd like to mark this as

8 Exhibit 15.

9 (Baggett Exhibit 15 was marked for identification.)

10 BY MR. SAFIER:

11 Q. Is Exhibit 15 the Books Looks entry for the
12 book "The Absolutely True Story of a Part-Time Indian"?

13 A. Appears that way.

14 Q. Okay. And can you turn to the second and third
15 pages, where they have charts that identify excerpts
16 from the book?

17 A. Okay.

18 Q. And can you look back at the excerpts you
19 submitted with your appeal form?

20 A. Yes.

21 Q. So if you look at the one on Page 12 in Book
22 Looks and Page 12 in your appeal form, they're
23 identical, correct?

24 A. It appears that way.

25 Q. Same for the next one?

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1 A. Uh-huh.

2 Q. Same for the next one?

3 A. It appears that way.

4 Q. Okay. In looking at -- there is an entry in
5 119 in both, can you look -- can you compare those to me
6 -- for me on Page -- for Page 119?

7 A. Okay.

8 Q. And am I correct that these two are identical
9 except that you handwrote a change in your appeal form;
10 is that right?

11 A. It looks that way.

12 Q. And you corrected a typo?

13 A. Yes.

14 Q. So is it fair to presume that you cut and
15 pasted out of the book --

16 A. That's --

17 Q. Let me finish -- out of the Book Looks website
18 into your appeal?

19 A. I don't think that that's fair to assume that.
20 What you have to understand is that a lot of websites
21 use this content, so it could have come from a different
22 website, which may have come from Book Looks or Rated
23 Books or something like that.

24 Q. So your testimony is that it came from some
25 website like Book Looks or Rated Books but you can't say

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1 which one?

2 A. Right. It's a cut and paste showing excerpts
3 for a book that I read in its entirety.

4 Q. Understood.

5 A. Yeah.

6 Q. But your testimony is that you did indeed cut
7 and paste that into your appeal form, correct?

8 A. Yes. The actual excerpts that I typed from the
9 book are in your exhibition, in the latter part, and you
10 can see that. I don't know -- you don't have the pages
11 num -- Page 53, those are the excerpts that I typed.

12 Q. Oh, right. So some -- just so I understand you
13 clearly, so for some excerpts you would cut and paste
14 them from Book Looks or --

15 A. Or I did them --

16 Q. Let me finish.

17 A. I'm sorry.

18 Q. -- or a site like Book Looks, but for other
19 excerpts, you would type them yourself; is that right?

20 A. On this one, apparently that's what I did.

21 Q. Okay. Do you know how frequently you did that
22 in your appeals?

23 A. When I first started submitting books, because
24 nobody knew what to do, including downtown, because no
25 one had ever submitted a form, you know, I did that to

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1 save time on a few but not many.

2 Q. Okay. But you don't -- do you know how many?

3 A. No.

4 Q. Does anyone help you with your book challenges?

5 A. No.

6 Q. Have you ever written a challenge that someone
7 else submitted under his or her name?

8 THE COURT REPORTER: Can you say the question
9 again?

10 Q. I'm sorry. Have you ever written a challenge
11 that someone else submitted under his or her name?

12 A. Have I ever written a challenge that someone
13 else -- not that I recall.

14 Q. And another way to ask the question, do you
15 know what a ghostwriter is?

16 A. Yes.

17 Q. Have you ever ghostwritten a challenge for
18 someone else?

19 A. My challenges end up all over the place, so
20 someone could easily use my challenges because they
21 are -- they are posted online on our school district
22 website.

23 MR. SAFIER: Okay. I'd like to mark this as
24 Exhibit 16.

25 (Baggett Exhibit 16 was marked for identification.)

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1 BY MR. SAFIER:

2 Q. Have you had a chance to review?

3 A. Yes.

4 Q. So you see this is an e-mail sent to you on
5 February 22nd, 2024, from someone with the name Clean
6 Books and the e-mail address cleanlibraries@gmail.com;
7 is that correct?

8 A. Yes.

9 Q. Who is or who is behind that account?

10 A. That's another -- that's my account.

11 Q. Clean Books is your account?

12 A. Uh-huh.

13 Q. So this is you e-mailing something to yourself?

14 A. Yes.

15 Q. Why do you have an e-mail account called Clean
16 Books?

17 A. It's just easy to -- it's a Gmail account, so,
18 I mean, it's just easy to, sometimes, if I'm trying to
19 remind myself of something, I just -- I have another
20 Gmail account, and I don't even know what this is.

21 MR. SAFIER: I'd like to mark this as

22 Exhibit 17.

23 (Baggett Exhibit 17 was marked for identification.)

24 BY MR. SAFIER:

25 Q. So you see at the top there is an e-mail dated

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1 March 22nd, 2023, do you see that?

2 A. Yes.

3 Q. And the e-mail is from

4 vicki@baggettsolutions.com --

5 A. Yes.

6 Q. -- to your school district's address; is that

7 correct?

8 A. Yes.

9 Q. I think I know the answer but I have to ask.

10 Who controls the account e-mail

11 vicki@baggettsolutions.com?

12 A. Me.

13 Q. Does anyone else have access to it?

14 A. No.

15 Q. So what you're forwarding is something from

16 someone named Amani Grow to your

17 vicki@baggettsolutions.com account, correct?

18 A. Yes.

19 Q. Who is Amani Grow?

20 A. This was -- I have not talked to her in a long

21 time. She had -- this was someone who wanted to assist

22 with reading books but she -- I don't even know if she

23 ever completed a form and did -- and read a book.

24 Q. When you mean assist by reading books, what do

25 you -- what do you mean by that?

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1 A. She wanted to read a book and submit a
2 challenge, but I don't think that she ever did.

3 Q. Was she in Escambia School District or a
4 different school district?

5 A. I believe she's Escambia.

6 Q. Is that something you've done, you've reached
7 out to other people and encouraged them to submit
8 challenges as well?

9 A. If they're interested in, yes, in being
10 involved, absolutely.

11 Q. And do you sort of organize groups where people
12 read books and they submit challenges?

13 A. I don't organize groups, no. They organize
14 themselves.

15 Q. Do you assist other people with challenges they
16 fill out?

17 A. If they ask me, absolutely.

18 Q. What do you do to assist them?

19 A. Show them what their -- the forms mean and show
20 them what they -- you know, how they need to fill out
21 their forms.

22 Q. And how many people have you helped like that,
23 do you recall?

24 A. Maybe 10.

25 Q. Okay. So looking back -- I'm sorry. Looking

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1 at it again, the -- Amani Grows forwards you what looks
2 to be a spreadsheet which she calls: The template for
3 reviewing books to consider submitting for appeal.
4 Please add columns and rearrange as you see fit. This
5 will at least get us started. As you are both editors
6 you will should be able to add folks to the sheet and
7 assign roles. If not, I would be happy to add them.

8 Did I read that correctly?

9 A. Yes.

10 Q. Do you know what this spreadsheet was?

11 A. Yes. She had taken the books that had been
12 submitted and she had put them on a spreadsheet. I
13 think she was trying to be super helpful, that I've
14 never even -- I don't even know if it's still in cyber
15 zone.

16 Q. Did you use that spreadsheet?

17 A. Excuse me?

18 Q. Did you personally use the spreadsheet she --

19 A. No. We -- I remember she had added some books
20 and we -- I think we tried to add some books to it, some
21 that people had submitted, because we were just trying
22 to keep up with it, but it -- it was too cumbersome.

23 Q. Have you tried to organize efforts to submit
24 book challenges?

25 A. No.

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1 MR. SAFIER: I'd like to mark this as
2 Exhibit 18.

3 A. Not that I recall.

4 (Baggett Exhibit 18 was marked for identification.)

5 BY MR. SAFIER:

6 Q. Do you see at the very top of this e-mail on
7 May 17th, 2023, you forward something to
8 bookdisciples@gmail.com?

9 A. Yes.

10 Q. Who is the person behind
11 bookdisciples@gmail.com?

12 A. That's an old account that I had.

13 Q. So this is -- you had another account that you
14 had, another Gmail account?

15 A. Uh-huh.

16 Q. Do you know why you were e-mailing this to
17 yourself?

18 A. Just to have a copy of it.

19 MR. SAFIER: I'd like to mark this as
20 Exhibit 19.

21 (Baggett Exhibit 19 was marked for identification.)

22 BY MR. SAFIER:

23 Q. Let me know when you are ready to discuss.

24 A. Okay.

25 Q. So this is an e-mail, at least the front page

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1 is an e-mail sent on May 23rd, 2023, from you to a
2 mrskris6@gmail.com; is that correct?

3 A. Yes.

4 Q. Who is the person you were e-mailing this to?

5 A. This is the lady who actually submitted this
6 form.

7 Q. Right. So that was going to be my next
8 question. So turn to the next page. There is a form, a
9 challenge form with respect to the book "Bingo Love."

10 A. Yes.

11 Q. And it was submitted by Kristy and Kristopher
12 Marshall; is that correct?

13 A. That's correct.

14 Q. Okay. And you were sending this e-mail to
15 Kristy Marshall; is that correct?

16 A. Yes.

17 Q. Why were you sending her -- or I guess,
18 stepping back, in the e-mail, you send to Ms. Marshall a
19 number of e-mail addresses, correct?

20 A. Yes. She wanted a copy of -- she could not
21 figure out the e-mail addresses of the board members.

22 Q. Did you draft the challenge for Ms. Marshall
23 that she submitted or did Ms. Marshall draft it?

24 A. Ms. Marshall did.

25 Q. Did you help her draft it?

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1 A. Yes.

2 Q. How did you help her?

3 A. She lives right down the road from me, so...

4 Q. No. I mean but in what specific way did you
5 help her?

6 A. Oh. Filling out the front part.

7 Q. You filled out the front part?

8 A. I helped her fill out the front part.

9 Q. How did you help her?

10 A. Like what she needed to write, like who
11 she needed to -- the author, what's the -- we didn't put
12 the ISBN number but she had marked the pages in the book
13 and so forth and she was having a hard time pulling in
14 the pictures, so I helped her with all of that.

15 Q. And how did it come to be the case that she
16 asked you to help you -- asked you to help her?

17 A. Her daughter is a public school student and her
18 daughter had come across a book online that was
19 inappropriate in nature, and when that happened, she
20 contacted me and wanted to get involved in helping with
21 making sure that our books are appropriate for minors.

22 Q. And you helped her fill out the challenge form,
23 correct?

24 A. Yes.

25 Q. And you gave her the list of people to send the

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1 challenge form to, correct?

2 A. Yes.

3 Q. I'm going to ask you just one short question
4 about this.

5 MR. SAFIER: I'd like to mark this as
6 Exhibit 20.

7 (Baggett Exhibit 20 was marked for identification.)

8 BY MR. SAFIER:

9 Q. Am I correct, Ms. Baggett, that this is an
10 e-mail in which you are sending to yourself the
11 challenge form we just looked at for "Bingo Love"?

12 A. Yes.

13 Q. Do you know why you did that?

14 A. Yes, because we had completed this form and she
15 needed to send this in, so this was a reminder to me.

16 MR. SAFIER: Okay. Why don't we take a rest
17 room break, if that's okay with everyone.

18 MS. SMITH: Yes, please.

19 MS. REGAN: Yes.

20 THE VIDEOGRAPHER: Stand by. Going off the
21 record. The time is 10:43 a.m.

22 (Recess from 10:43 a.m. until 10:55 a.m.)

23 THE VIDEOGRAPHER: We are back on the record.

24 The time is 10:55 a.m.

25 BY MR. SAFIER:

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1 Q. Ms. Baggett, you testified earlier that
2 sometimes you will peruse libraries and pull books off
3 shelves to potentially challenge; is that right?

4 A. Yes.

5 Q. Are there any cases where you pull a book off a
6 shelf, start reading it and say this book is okay, it
7 should be in the library?

8 A. Absolutely.

9 Q. Can you name any specific books?

10 A. One that I just found, as a matter of fact, and
11 submitted a form for on Monday. It's called "The
12 Running Dream." The story line itself is phenomenal.
13 It's great. It's about a lady named Jessica, a girl
14 named Jessica, she loses her leg in an accident. She
15 ends up with a prosthetic leg, comes back to school, she
16 was a runner. Her friends talk her into running again.
17 It's a great story. However, at the end of the book,
18 under the about the author page, there is a website that
19 is given called "Exercisetherighttoread.org." If you go
20 to that website, you will be faced with porn. So when I
21 submitted the challenge for that book, I specifically
22 said on the form the book itself is great, this is a
23 challenge for this link.

24 Q. And when you say there is porn at the link, do
25 you mean --

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1 A. Naked girls showing body parts, paragraphs
2 describing the naked girls saying things that are very
3 inappropriate. I'm talking about porn. Okay? So that
4 particular book, the school district is in agreement.
5 They -- the book is perfectly fine, the link is not, so
6 they are going to get rid of the link.

7 Q. All right. So that's an example where you
8 challenged the link but not the rest of the book?

9 A. Right.

10 Q. Can you think of an example where you picked a
11 book off the shelf, started reading it thinking you
12 might challenge it, and then decided it was okay and
13 could be in the library?

14 A. Let's see. "The Pearl."

15 Q. So "The Pearl" is a book you read and decided
16 it was appropriate, correct?

17 A. Uh-huh. Yes.

18 Q. How did you happen to pull that book off the
19 shelf?

20 A. You've got to remember I'm an English teacher.
21 You know, this is what I do. I just -- I mean, I read
22 constantly. I have five books going right now at one
23 time, but, I mean, I can think of a bunch of books, I
24 just have to think about the names, but there are many
25 that I have looked at and started reading and even got

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1 to the end and said, "Hmm," you know.

2 But what I do, I actually have the laws beside
3 me as I'm looking. That's what I do.

4 Q. And there are thousands of books in school
5 libraries, correct?

6 A. Right.

7 Q. So my question is how did you happen to pull
8 "The Pearl" off the shelf or some other book on the
9 shelf off the shelf, what is your method?

10 A. I don't have a method.

11 Q. It's just random?

12 A. It's just random.

13 Q. You testified earlier that occasionally or at
14 least sometimes you would find a book that was
15 potentially objectionable on Book Looks or a site like
16 that and then start reading it to see if you agreed,
17 correct?

18 A. Uh-huh.

19 Q. Are there any examples where you went through
20 that process, read the book, and said, "You know what, I
21 disagree with Book Looks, I think this book is
22 acceptable"?

23 A. Yes. I mean, there are -- I'm sure. I mean, I
24 don't know all of the books that they have listed. I do
25 not use those websites or those lists as the talisman

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1 for what I do, but I'm sure that they have many.

2 Q. Right. But no, I'm not asking you to guess.
3 I'm asking you for whether you can think of a specific
4 example where you identified a book as potentially
5 objectionable based on Book Looks or a site like that,
6 started reading it and then decided this book is okay,
7 I'm not going to challenge it?

8 A. There are many books but I would have to go to
9 their website to tell you some of the ones that I've
10 looked at, because I read constantly, and I mean --

11 Q. Sure.

12 A. Unless I think -- I may think of some as we go
13 but, I mean, I've got titles in my head, you know.

14 Q. Understood, but just to close the loop, as you
15 sit here today, you can't remember a specific book title
16 that fell into that category?

17 A. Let's see. Hold on. I'm going -- I'm starting
18 at the alphabet.

19 Q. If you -- I mean, we -- if you think of a
20 book --

21 A. Okay. I'll come back to it.

22 Q. -- let me know. I appreciate that, but for now
23 you cannot.

24 MR. SAFIER: So I want to mark this as
25 Exhibit 21.

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1 (Baggett Exhibit 21 was marked for identification.)

2 BY MR. SAFIER:

3 Q. So am I correct that this is an e-mail that you
4 sent on August 11th, 2022, to Tim Smith?

5 A. Yes.

6 Q. Who is Tim Smith?

7 A. He is our former superintendent.

8 Q. Okay. And in this e-mail you were sending him
9 a list of 33 books that you considered, quote-unquote,
10 extremely concerning; is that correct?

11 A. Yes.

12 Q. Was this fairly early -- we're at August 11th,
13 2022. Was this fairly early in the book challenge
14 process for you?

15 A. Yes.

16 Q. So these are some of your earlier challenges?

17 A. Yes.

18 Q. On this e-mail you BCC Kevin Adams; is that
19 right?

20 A. Yes.

21 Q. And that is the Chair of the school board,
22 correct?

23 MS. SMITH: Objection; form.

24 A. Yeah, I don't know if he's -- he was -- I don't
25 know if he was the Chair.

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1 Q. That is a member of the school board, correct?

2 A. Yes.

3 Q. That's all I needed. Why did you BCC him?

4 A. I don't know. I'm just looking at that because

5 normally when I e-mail, I e-mail all of them, I e-mail

6 everybody, so I can't answer that. I don't know.

7 Q. Do you know if that's something you did with

8 regularity, would BCC Mr. Adams on e-mail?

9 A. Actually, I did ccs.

10 Q. Okay.

11 A. So BCCs was not something I normally did.

12 Q. Okay.

13 A. And I always, you know, tried to do every

14 single board member.

15 Q. Can you describe for me the nature of your

16 relationship with Mr. Adams?

17 A. I know him when I see him, you know.

18 Q. Do you -- we're going to look at some e-mails

19 in a second, but outside the context of e-mails, do you

20 communicate with him in person?

21 A. When I see him, sure, I speak to him.

22 Q. When do you see him?

23 A. I have seen him at, like -- we went to the same

24 breakfast, we ended up at the same breakfast thing

25 together, and at board meetings, you know. I speak to

Deposition of Victoria G. Baggett

1 anybody, you know.

2 Q. Any other context in which you interact with
3 him?

4 A. No.

5 Q. How long have you known him?

6 A. I have never even talked to him until our book
7 challenges, so I guess two years.

8 Q. So you met him in the context of your book
9 challenges?

10 A. Yes.

11 Q. Did you ever text with him?

12 A. No, I don't think.

13 Q. You had to think for a while. Are you sure?

14 A. Well, I mean, not in the -- I've text him
15 before asking him if I could, you know -- like, "Do you
16 know anything about..." "Did you get my e-mails?" you
17 know, "Did any board members get my e-mails?"

18 But that was at the beginning of the book
19 challenges.

20 Q. So you have texted him about book challenges,
21 correct?

22 A. Yes, I think once or twice, but I -- actually,
23 I think I called him. I think I called him rather than
24 texting, to be honest with you.

25 Q. That was going to be my next question. Do you

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1 sometimes talk on the phone with him?

2 A. It has been a very long time, but I have talked
3 with him on the phone, I can count on one hand.

4 Q. Did you call him or did he call you?

5 A. He returned my phone call.

6 Q. And what were you calling him about?

7 A. Books.

8 Q. And what did you discuss over the phone with
9 him?

10 A. That I had found many inappropriate content and
11 age-inappropriate books and how can I get the board to
12 see these, because I did not know the process.

13 Q. And do you recall what he told you about that?

14 A. He did not either, and he said, you know, to
15 contact downtown, contact the media specialist. If I
16 recall correctly, that's what he said.

17 Q. Okay. And do you recall -- and, you know, you
18 can give me a rough number -- how many times you spoke
19 with him on the phone?

20 A. Five, six.

21 MR. SAFIER: Okay. I'd like to mark this as
22 Exhibit 22.

23 (Baggett Exhibit 22 was marked for identification.)

24 BY MR. SAFIER:

25 Q. So this is an e-mail exchange between you and

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1 Mr. Adams, correct?

2 A. Yes.

3 Q. If you look at the very bottom, it appears to
4 begin with an e-mail sent on August 30th, 2022, from
5 Mr. Adams to you, correct?

6 A. Let me see. Hold on.

7 Q. Sorry.

8 A. Oh, where he said, "When you have time please
9 check and verify if we have this book in our system"?

10 Q. Yes.

11 A. Yes.

12 MR. SAFIER: I'm getting a spam call. Can we
13 go off the record for one second?

14 THE VIDEOGRAPHER: Yes. Going off the record.
15 The time is 11:06 a.m.

16 (Recess from 11:06 a.m. until 11:06 a.m.)

17 THE VIDEOGRAPHER: We are back on the record.
18 The time is 11:06 a.m.

19 BY MR. SAFIER:

20 Q. Sorry about that, Ms. Baggett.

21 A. Uh-huh.

22 Q. So he writes to you, as you mentioned: When
23 you have time please check and verify if we have this
24 book in our system. Thanks, Kevin.

25 And he sends you a link to a news article; is

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1 that right?

2 A. No, he was -- he was referring --

3 Q. On the next page, if you look at the next page.

4 A. Oh. Yes, I think it was, "This Book is Gay,"
5 wasn't it? I don't know which book it is but...

6 Q. So he asked you -- we can agree on this. He
7 asked you to verify if the book referenced in the
8 article he sent a link to is in the Escambia library
9 system, correct?

10 A. Yes.

11 Q. Okay.

12 A. I guess that that's what that book is. I don't
13 know.

14 Q. Do you know why he e-mailed you in particular
15 for that task?

16 A. Because I'm definitely passionate about this
17 problem and he knows that.

18 Q. Does he share your passion?

19 A. I do not know.

20 MS. SMITH: Objection; form.

21 A. Yeah, I have no way of knowing that.

22 Q. Would he --

23 A. He just knows that I'm in front on this.

24 Q. Would he e-mail you this kind of request
25 frequently?

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1 A. No.

2 Q. So looking at your response on August 31st,
3 2022, you write: Good morning. Fortunately, we do not
4 have "The Book is Gay" in our school district; however,
5 we have 54 books that are marked under the key word
6 "transgender" available for all school levels
7 (elementary, middle and high).

8 Did I read that correctly?

9 A. Yes.

10 Q. Explain to me what you mean by using the key
11 word transgender. Can you walk me through that process?

12 A. You can go into Destiny and you can type in key
13 words, and you have to remember 1557 was for the
14 protection of K through 3, and we're not supposed to
15 have anything that would be too advanced for young
16 minds, especially in the terms of sexuality. So you
17 could search key words in Destiny. Destiny is our
18 school district database. That's what I mean by that.

19 Q. Sure. And just to return to my question, which
20 is just about key word searching, so one way in which
21 you could find books in Destiny is by using key word
22 searches.

23 A. Oh, absolutely. Our librarians do that all the
24 time.

25 Q. If finding books to challenge, would you do key

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1 word searches?

2 A. Oh, yes.

3 Q. So here you did a key word search for
4 transgender. Can you think of any other key word
5 searches you've done to find books to challenge?

6 A. Sex, coming of age. Coming of age is very --
7 you can find a lot. Just because a book, though -- I
8 want to make it clear, just because a book might have
9 transgender characters, you know, that doesn't mean that
10 it's going to have sexual connotations, you know, so --
11 but those are some -- the coming of age is a -- is --
12 there's enough there under that key word to keep a
13 reader busy for a long time.

14 Q. And just to close the loop, we've talked a lot
15 today about ways in which you find books to challenge,
16 and this is another way, you do key word searching,
17 correct?

18 A. Uh-huh. Yes.

19 Q. Is it fair to say that in this e-mail you are
20 expressing to Mr. Adams the view that these books that
21 come up under the key word transgender should not be in
22 Escambia school libraries?

23 A. Based on 1557, not for elementary students,
24 correct.

25 Q. Okay. So then Mr. Adams thanks you for

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1 checking and says something about what is happening in
2 St. Johns. Is that correct?

3 A. Yes.

4 Q. Is St. Johns another school district?

5 A. I don't know. I don't even know where it is.

6 Q. Fair enough. And then you write to him, this
7 is August 31st, 2022, at 9:49 a.m.: This is incredible
8 to me. I wonder if the new board member would be a
9 friend to us in this area.

10 Did I read that correctly?

11 A. Yes.

12 Q. And the "us" here refers to you and Mr. Adams,
13 correct?

14 A. No. It would refer to anyone who is wanting to
15 protect minor children from this sort of influence.

16 Q. Do you include Mr. Adams in that category?

17 A. I hope so. I sure hope so. He's a board
18 member.

19 Q. Do you have any basis -- beyond hope, do you
20 have any basis to believe that he in fact shares your
21 goals in this regard?

22 A. His vote, yeah, his public vote at board
23 meetings, yes.

24 Q. Do you believe that he shares your positions
25 about book challenges?

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1 A. I hope so but I don't know.

2 MS. SMITH: Objection; form.

3 A. I mean, I don't know his thoughts.

4 MR. SAFIER: Can you read back her answer?

5 (The answer was read by the reporter.)

6 (Discussion off the record.)

7 BY MR. SAFIER:

8 Q. Has Mr. Adams ever expressed to you views about
9 what books he considers appropriate to be in school
10 libraries?

11 A. No.

12 MR. SAFIER: I'd like to mark this as
13 Exhibit 25.

14 THE COURT REPORTER: 23.

15 MR. SAFIER: 23.

16 (Baggett Exhibit 23 was marked for identification.)

17 BY MR. SAFIER:

18 Q. Do you see at the very bottom there is an
19 e-mail from Tim Smith to you dated September 8th, 2022?

20 A. Yes.

21 Q. And is he updating you on the status of certain
22 challenges you filed?

23 A. Yes.

24 Q. And you write back to him: Dr. Smith, What I
25 wish to know from you is the same question I've been

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1 asking since I have submitted books that show
2 obscenities: Are you going to be shelving the books
3 while you are trying to refine and implement this new
4 policy?

5 Correct, that's your question?

6 A. Yes.

7 Q. Do you recall what you were getting at there?

8 A. Yes, exactly what we currently have in our law,
9 and that is when a book is submitted based on 847, the
10 district has five days to remove it from the shelf while
11 it is being reviewed.

12 Q. What is 847?

13 A. 847 is the obscenity, age-inappropriate,
14 content-inappropriate law, 847.012. If a book is
15 submitted based on 847, the district has five days to
16 pull it off the shelf.

17 Q. And that was not the policy as of
18 September 8th, 2022, correct?

19 A. I don't think it was.

20 Q. And what you're saying here to Mr. Smith is
21 there should be a policy like --

22 A. Yes.

23 Q. Let me finish. -- like the later 847 policy,
24 correct?

25 A. Yes.

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1 Q. And then do you forward your e-mail exchange
2 with Tim Smith to Mr. Adams?

3 A. Very possibly, yes, and I also may have
4 forwarded it to other board members --

5 Q. Okay.

6 A. -- as well, not just Mr. Adams.

7 Q. And Mr. Adams writes to you: Good question.
8 Thanks for keeping me updated.

9 Correct?

10 A. Yes.

11 Q. Do you have any sense of what he meant by that?

12 A. No.

13 Q. Did you take that as a statement of support for
14 what you were doing?

15 A. Yes, I hope so, because we had no policy or,
16 you know, the policy was weak, so that's what we were
17 trying to get to.

18 MR. SAFIER: I'd like to mark this as
19 Exhibit 24.

20 Oh, sorry. I handed it to the wrong person.

21 (Baggett Exhibit 24 was marked for identification.)

22 BY MR. SAFIER:

23 Q. Let me know when you've had a chance to review.

24 A. Okay.

25 Q. Are you good?

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1 A. Yes.

2 Q. So this is an e-mail sent to you on
3 October 9th, 2022, from Mr. Adams; is that correct?

4 A. Yes.

5 Q. And he writes to you: Vicki, Please review the
6 attached proposed new policy that will be discussed in
7 the morning workshop and provide any concerns or
8 suggested edits.

9 Correct?

10 A. Yes.

11 Q. So am I understanding correctly that here
12 Mr. Adams is asking you to review and suggest edits to a
13 proposed new school board policy?

14 A. Yes, because it concerns books.

15 Q. So the proposed new policy specifically --
16 specifically had to do with challenges to library books,
17 correct?

18 A. Yes, instructional material and material used
19 in the classroom and the libraries.

20 Q. And he's asking you to review and -- sorry --
21 review and provide any concerns or suggested edits to
22 the proposed new policy, correct?

23 A. Yes, because he knew I couldn't go to the
24 workshop.

25 Q. Do you know why he was asking you?

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1 A. I would assume because this was something that
2 was very important to me. I was pushing for new policy
3 related to this.

4 Q. Do you think he valued your input on the
5 subject?

6 A. Yes.

7 Q. And what is your basis for thinking that?

8 A. Because he asked my opinion.

9 MR. SAFIER: I'd like to mark this as
10 Exhibit 25.

11 (Baggett Exhibit 25 was marked for identification.)

12 BY MR. SAFIER:

13 Q. So, Ms. Baggett, am I correct that this is a
14 continuation of the e-mail exchange we just looked at?

15 A. Yes.

16 Q. So at 7:17 a.m. on October 10th, 2022, you
17 e-mail Mr. Adams with your views about the proposed new
18 policy, correct?

19 A. Yes.

20 Q. Okay. And he writes back to you: Thanks for
21 the quick feedback and all you do for kids!

22 With an exclamation point, correct?

23 A. Yes.

24 Q. Do you know what he meant by that?

25 A. The fact that I'm trying to protect minors from

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1 inappropriate material.

2 Q. Did you interpret that at the time as support
3 for what you were doing?

4 A. Yes.

5 MR. SAFIER: I'd like to mark this as
6 Exhibit 26.

7 (Baggett Exhibit 26 was marked for identification.)

8 BY MR. SAFIER:

9 Q. So if you'd look all the way down, there's an
10 e-mail from -- I'm going to mispronounce this -- but
11 gina.maiola@governor.alabama.gov. Do you see that?

12 A. Yes.

13 Q. Do you know who Gina is?

14 A. No.

15 Q. But she's someone who is affiliated with
16 Governor Kay Ivey --

17 A. That's correct, yeah.

18 Q. Sorry. Let me finish. -- Governor Kay Ivey of
19 Alabama, correct?

20 A. Yes.

21 Q. Okay. And then you take this e-mail and you,
22 in an e-mail, write: Dear Board Members, Superintendent
23 and Other Staff: Thought I would send this to you, in
24 case you had not heard about it. Thanks for holding the
25 line and doing what is right for our children. Be

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1 encouraged.

2 Q. Did I read that correctly?

3 A. Yes.

4 Q. And am I -- am I correct in surmising that you
5 sent that to all the board members and the
6 superintendent, among others?

7 A. Yes.

8 Q. Do you know what you meant by "thanks for
9 holding the line and doing what is right for our
10 children"?

11 A. Taking this whole situation seriously. Up to
12 this point we had had board meetings that sometimes
13 lasted six and seven hours and, you know, they're
14 hearing both sides to this issue, so that's exactly what
15 I meant.

16 Q. Can you explain that to me a little more? So
17 what are they doing that you consider holding the line
18 and doing what's right for our children?

19 A. They're redoing library policy, they're coming
20 up with a best approach method for submitting books, and
21 then coming up with a solution about those books.
22 They're not just ignoring it. They're trying to do
23 something about it.

24 Q. Gotcha. And you appreciated that?

25 A. Oh, yes.

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1 Q. So Mr. Fetsko writes back: Thank you for
2 sharing this information with me and the other Board
3 members.

4 Correct?

5 A. Yes.

6 Q. What's the nature of your relationship with
7 Mr. Fetsko?

8 A. He's just a board member.

9 Q. Have you ever spoken to him?

10 A. One time.

11 Q. When was that?

12 A. At a breakfast.

13 Q. Can you describe for me the substance of that
14 conversation?

15 A. Hello. How are you?

16 Q. Did he know who you were?

17 A. Yes.

18 Q. Have you ever spoken on the phone with
19 Mr. Fetsko?

20 A. I think one time he returned my phone call
21 when --

22 Q. Why would you -- sorry. Why were you calling
23 him?

24 A. When I first started all of this, when I was
25 trying to find out what to do.

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1 Q. And can you describe to me -- for me the
2 substance of that conversation?

3 A. Well, I would start by talking to the library
4 media specialist, that's what he said.

5 Q. Oh, okay. But in response to what?

6 A. To how do I begin this process.

7 Q. Gotcha. Understood.

8 Do you -- and you may not remember this, but do
9 you remember at all the nature of the article or I guess
10 e-mail that you were forwarding to the board? Do you
11 remember this -- forwarding this specific newsletter?

12 A. This article?

13 Q. Yeah.

14 A. No. I would have to reread it. I'm a big
15 supporter of Governor Ivey, though.

16 Q. Why is that?

17 A. She's just -- she's old-fashioned and what you
18 see is what you get with her. I like her.

19 Q. I want to just read the first three paragraphs
20 here or part of the first three paragraphs. This is an
21 e-mail from, you know, Governor Ivey's office. Good
22 afternoon -- it reads: Good afternoon. Last week it
23 was brought to the administration's attention that there
24 was concerning content in a pre-K educator resource
25 book, content that's simply not in line with what the

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1 Ivey administration or the people of Alabama stand for
2 or believe. Immediately Governor Ivey sought review and
3 upon confirming with the Alabama Department of Early
4 Childhood Education that the book is in fact a
5 book distributed in this state, the Governor directed
6 ADECE Secretary Barbara Cooper to send a memo to disavow
7 this book and to immediately discontinue its use.
8 Governor Ivey has made the decision to have a change in
9 leadership at the department and accepted Dr. Cooper's
10 resignation immediately.

11 Did I read that correctly?

12 A. Uh-huh.

13 Q. Do you recall at all why you were sending the
14 board something about demanding and accepting the
15 resignation of a government official?

16 A. That was not the point. The point was she did
17 something about the book immediately, she didn't wait.
18 When you see that a book is not appropriate for content
19 or it's not age-appropriate, you know, look at the
20 damage that can be done in the meantime if we leave it
21 on the shelf. That was the whole point of this article.
22 It wasn't even about somebody being replaced or
23 resigned. It was the fact that she made a decision,
24 boom, remove the books.

25 Q. So this e-mail didn't relate at all to

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1 Mr. Smith and his eventual firing?

2 A. Oh, no. I didn't even know about that, what
3 happened.

4 Q. Just asking. Is it your understanding that
5 Mr. Fetsko supports your book challenges?

6 A. I hope so. I don't know.

7 Q. What is the -- do you have a basis for your
8 hope?

9 A. Anybody who serves children, I would hope their
10 first and foremost goal is to protect what goes into
11 their minds, so I hope that those board members have
12 that as their number one goal.

13 Q. But with respect to Mr. Fetsko in particular,
14 do you have reasons to believe he does or does not
15 support you?

16 A. Every time I see him, he smiles and waves, so
17 I'm going to say yes, he supports me. Perhaps all the
18 other board members do as well, because they smile and
19 waved, too.

20 Q. What is the nature of your relationship with
21 David Williams?

22 A. I -- board member, he's just a board member.

23 Q. Have you ever spoken with him?

24 A. Just at board meetings.

25 Q. Did you ever call him?

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1 A. Yes. He did not return my call.

2 Q. Do you know if he supports your book challenge
3 efforts?

4 A. I hope so. I do not know.

5 Q. So you don't -- you don't know one way or the
6 other?

7 A. No, but I hope so, again, because he's a board
8 member.

9 Q. What's your understanding of his politics?

10 A. Of his politics?

11 MS. SMITH: Objection; form.

12 A. I do not know his politics.

13 Q. Okay. What's the nature of your relationship
14 with Bill Slayton?

15 A. He is my board member in my district.

16 Q. Have you ever spoken with him?

17 A. Nope.

18 Q. Did you ever call him?

19 A. Yes.

20 Q. Did he return your call?

21 A. No.

22 Q. Do you know if he's supportive of your book
23 challenges?

24 A. I hope so, but I do not know.

25 Q. And I should have asked this with David

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1 Williams, but do you know if he's supportive of your
2 book challenges?

3 A. I hope so, but I do not know.

4 Q. What's your relationship with Patty Hightower?

5 A. She is a board member.

6 Q. Have you ever spoken with her?

7 A. Just at the board meetings.

8 Q. Do you know if she supports your book
9 challenges?

10 A. I hope so, but I do not know.

11 Q. What is the understanding of her politics?

12 A. I do not know.

13 MS. SMITH: Form.

14 MR. SAFIER: I'd like to mark this as
15 Exhibit 27.

16 (Baggett Exhibit 27 was marked for identification.)

17 BY MR. SAFIER:

18 Q. Let me know when you're ready.

19 A. Okay.

20 Q. So this is an August 25th, 2022, e-mail you
21 sent to Mr. Smith. Is that right?

22 A. Yes.

23 Q. And you write: Dear [sic] Smith: Thanks for
24 your meeting yesterday. I hope for a timely and
25 effective solution to what we are discovering about

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1 obscene books in our district school libraries. I am
2 enclosing my Set 3 in digital format, although I gave
3 all three sets to you in published format. Have a
4 blessed day. Vicki Baggett.

5 Did I read that correctly?

6 A. Yes.

7 Q. So I around this time, I guess one day before
8 this, August 24th, 2022, you had an in-person meeting
9 with Mr. Smith, correct?

10 A. That is correct.

11 Q. How did that meeting come about?

12 A. He invited me to his office to discuss my
13 concerns about books and we had an hour-long meeting.

14 Q. Do you know why he invited you to his office?

15 A. I assume because -- because it was extensive.
16 I had found over 100 and something books that were
17 concerning, and so he invited me to come talk to those
18 books, about those books.

19 Q. And you met for an hour?

20 A. Uh-huh.

21 Q. And it was just the two of you?

22 A. (Nodding head.)

23 Q. Recog -- you know, acknowledging that you can't
24 recall an entire hour-long conversation, tell me
25 everything you recall about your conversation with him.

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1 A. He was very concerned about the books as well.
2 He said that he was. He stated that he -- I showed him
3 some of the excerpts from the books and even asked him
4 to read them out loud, and he couldn't, and he said that
5 that would -- he would not want his own children to be
6 in that situation as well or to read those books, and he
7 said that he would do something, at least make a move on
8 trying to bring these books -- attention to these books
9 so that we can do something, come up with a policy, do
10 something about this.

11 Q. And by do something, what do you mean?

12 A. Have review committees, whatever. I don't
13 know, because you have to remember this was at the
14 beginning and so the policy was very weak.

15 Q. What do you mean by very weak?

16 A. It was not like it is now.

17 Q. What's the difference between the policy then
18 and the policy now?

19 A. The policy now is we do not have school review
20 committees, we have -- like, if a book is submitted
21 based on 847, it coincides with the state law, it must
22 be removed for -- within five days until a review
23 committee can meet and decide if a review committee
24 needs to meet. Oftentimes the book itself is obvious,
25 you know, the content of the book is obvious. That's

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1 the difference.

2 We just -- we did -- our policy -- no one had
3 ever challenged a book, is my understanding.

4 Q. Do you think the policies are better now than
5 they were when you first started making book challenges?

6 A. Oh, yes, yes.

7 Q. Do you think you played a role in getting the
8 policies changed?

9 A. I don't know. I don't know, and if so, that's
10 not my goal. My goal, you know, is why do we have this
11 in front of minor children? Why do we have this sort of
12 thing?

13 Q. But you agree that you advocated for changes in
14 policies, correct?

15 A. Oh, yes, and I will continue to.

16 Q. And you did in your meeting with Tim Smith that
17 we just discussed, correct?

18 A. Yes. It was a very cordial meeting. It was a
19 nice meeting. It was storming that day, I remember
20 that. It took me a long time to get there.

21 Q. Who is Michelle White?

22 A. Michelle White is the former library media
23 director for Escambia County.

24 Q. In that capacity, what was her role?

25 A. All books that were submitted for challenges

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1 would go to her.

2 Q. Do you think she took her job seriously?

3 A. I do.

4 Q. Was she professional in her dealings with you?

5 A. I feel she was very professional.

6 Q. Did she treat you with respect?

7 A. Yes.

8 Q. We touched on this just a second ago but I want
9 to drill down a little bit. When you first started
10 submitting book challenges, the policy in the district
11 was that all books remain in place on shelves as they
12 previously had during the pendency of the challenge,
13 correct?

14 A. That's my understanding, yes.

15 Q. Is it fair to say that you disagreed with that
16 policy?

17 A. Yes. Yes.

18 Q. I think that's fair.

19 A. Yeah.

20 Q. Let the record show that she nodded her head
21 vigorously.

22 A. Yes.

23 Q. I'm going to ask you another question that
24 might elicit the same response. Is it fair to say that
25 you expressed your disagreement with that policy

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1 vocally?

2 A. Yes.

3 Q. And you expressed that to the school board,
4 correct?

5 A. Yes.

6 Q. At a school board meeting, correct?

7 A. Probably, yes.

8 Q. And to Tim Smith directly, correct?

9 A. In the -- in the meeting that I had with him,
10 yes. I've never been disrespectful to -- you've got to
11 remember, I'm an employee, so, I mean, I've never been
12 hateful to anybody like that, but yes, our policy was
13 weak.

14 Q. I'm from Philadelphia. Vocal doesn't mean
15 disrespectful. It just means out loud.

16 A. Okay. Okay. Okay. Okay.

17 Q. So you expressed that policy out loud to Tim
18 Smith.

19 A. Thank you.

20 Q. Sure.

21 MS. SMITH: You're in the South, no.

22 MS. REGAN: Uh-huh.

23 MR. SAFIER: I was aware of that.

24 Q. And, ultimately, the policy we just talked
25 about was changed, correct?

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1 A. Yes.

2 Q. Do you believe you played a role in getting it
3 changed?

4 A. I'm assuming.

5 Q. Okay. And what's the basis of that assumption?

6 A. Well, because it's changed now.

7 MR. SAFIER: I'd like to mark this as
8 Exhibit 28.

9 (Baggett Exhibit 28 was marked for identification.)

10 BY MR. SAFIER:

11 Q. So at the bottom of Exhibit 28 there is an
12 August 11th, 2022 e-mail to you from Steve Marcanio?

13 A. Yes.

14 Q. Did I pronounce that correctly?

15 A. Marcanio.

16 Q. Marcanio. Marcanio. And he is updating you on
17 the status of your challenge to "The Perks of Being a
18 Wallflower," correct?

19 A. Yes.

20 Q. And you write back to him on August 11th, 2022,
21 copying Kevin Adams, Michael Sherrill, Gerald Pippins,
22 Michelle White and Brian Alaback, correct?

23 A. Yes.

24 Q. And I'm going to skip to the last few sentences
25 of your e-mail which you write to him: My question at

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1 this point --

2 Or all these people: My question at this point
3 is are the books going to be pulled from the shelves
4 while these investigations are going on in order to have
5 these out of the hands of children while your committee
6 determines if these are appropriate for our school
7 district. Please note I will no longer find excerpts
8 for the committee, as I do not have time to do this for
9 you, but since you are compiling a qualified committee,
10 that should not be an issue. Note that all of the books
11 that I will be submitting I have personally reviewed.

12 Did I read that correctly?

13 A. Yes.

14 Q. And then if you see above, Mr. Adams forwards
15 your e-mail to Mr. Smith, correct?

16 A. Yes.

17 Q. And he writes: Superintendent, As discussed,
18 you have the statutory authority to take the books out
19 of circulation until they are reviewed by committee. I
20 would appreciate quick action to ensure our students do
21 not have access to inappropriate materials. I would
22 believe Ms. Baggett is providing a valuable service to
23 the district by identifying books that should be pulled
24 from circulation districtwide. Once again, appreciate
25 your quick action on this matter.

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1 Did I read that correctly?

2 A. Yes.

3 Q. Have you seen this e-mail before?

4 A. Yes -- what --

5 Q. The one from Kevin Adams to Tim Smith.

6 A. Oh, no. I don't think I have, no.

7 Q. Did you know that Kevin -- Mr. Adams was going
8 to send that e-mail?

9 A. No, but I'm glad he did.

10 Q. Okay. Did you discuss the policy change you
11 were advocating for directly with Mr. Adams?

12 A. I do not think that I did, no.

13 Q. Okay.

14 A. In -- but in school board meetings, I think
15 that I publicly would discuss the change for it.

16 Q. And the policy was eventually changed, correct?

17 A. Yes.

18 Q. And it was changed by Mr. Smith?

19 A. Yes.

20 MS. SMITH: Form.

21 A. But -- well, I don't -- I don't know if it was
22 by Mr. Smith. I think the library committee, you know,
23 downtown, the district committee came up with the
24 changes.

25 Q. Okay.

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1 A. But I'm sure he was a part of it.

2 MR. SAFIER: I'd like to mark this as
3 Exhibit 29.

4 (Discussion off the record.)

5 (Baggett Exhibit 29 was marked for identification.)

6 BY MR. SAFIER:

7 Q. So do you agree that this is an e-mail that you
8 sent on August 15th, 2022, to the following people: Tim
9 Smith, Kevin Adams, Governor Ron DeSantis, Michael
10 Sherrill, Gerald Pippins, Patricia Hightower, Laura
11 Edler, and Steve Marcanio?

12 A. Yes.

13 Q. Okay. I probably asked this before but who is
14 Gerry Pippins?

15 A. He is my assistant principal.

16 Q. Who is Michael Sherrill?

17 A. He is my principal.

18 Q. Got you. And just -- I'm going to skip down to
19 the second-to-last paragraph of your e-mail. You write
20 to this group: Please, please, please use your
21 authority to at least remove these books while your
22 committee reviews these books.

23 Did I read that correctly?

24 A. Yes.

25 Q. And that's the position you were advocating

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1 for, correct?

2 A. Absolutely.

3 Q. And is that still what you think is the correct
4 position?

5 A. Absolutely, and apparently the State does, too,
6 because that's now the law.

7 MR. SAFIER: Okay. I'd like to mark this as
8 Exhibit 30.

9 (Baggett Exhibit 30 was marked for identification.)

10 BY MR. SAFIER:

11 Q. So you'll see on Exhibit 30 there is an e-mail
12 sent on September 8th, 2022, from Tim Smith to you.

13 A. Yes.

14 Q. In this e-mail Mr. Smith is object -- is --
15 sorry -- is updating you on the status of one of your
16 book challenges, correct?

17 A. Yes.

18 Q. He writes in the second paragraph: I received
19 a copy of two of the books, but have struggled to find
20 reading time. I did meet recently to look at other
21 possibilities for our current situation and am trying to
22 figure a way to add some form of a quicker solution to
23 this matter.

24 Correct?

25 A. Yes.

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1 Q. Is this an issue you had raised with Mr. Smith,
2 expediting the process?

3 A. Oh, yes.

4 Q. And then you forward this e-mail to Mr. Adams,
5 correct?

6 A. Yes.

7 Q. Why did you do that?

8 A. Well, because he was the first board member who
9 called me back concerning the book challenges.

10 Q. And you thought he might be supportive of your
11 position?

12 A. Absolutely.

13 MR. SAFIER: I'd like to mark this as
14 Exhibit 31.

15 (Baggett Exhibit 31 was marked for identification.)

16 BY MR. SAFIER:

17 Q. So do you see on September 15th, 2022, you send
18 an e-mail to Tim Smith, Governor Ron DeSantis, Kevin
19 Adams, Paul Fetsko, another e-mail address I don't know,
20 Michelle White, Michael Sherrill, Gerald Pippins, and
21 Scott Marciano; is that correct?

22 A. Yes.

23 Q. And who is the Gmail address?

24 A. I don't know that either.

25 Q. Okay.

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1 A. Hey, but I do see -- I had forgotten that he
2 was the chair, so that's probably why I also cc'd him to
3 begin with, because he was the chair of the school
4 board.

5 Q. He being Mr. Adams?

6 A. Yes.

7 Q. So just to create a record, as of
8 September 19th, 2022, Mr. Adams was the chair --

9 A. Yes.

10 Q. -- of the Escambia County School Board,
11 correct?

12 A. Yes, and I had forgotten that, so...

13 Q. Fair enough. So you write, getting back to
14 your September 15th e-mail, you write: Dear Mr. Smith
15 and Others: Please find attached my fourth set of books
16 with questionable and inappropriate/obscene content. I
17 have provided 17 books in this set, with sample excerpts
18 from each book. I have also provided your forms to
19 begin the review process. This is now a total of 117
20 books that I have submitted for review. I am amazed
21 that all of the ones I have submitted are still on the
22 shelves, including those with graphic sexual pictures.
23 We all know books like these are not appropriate, and it
24 is sad to me that anyone has to beg our educational
25 leaders to stop making these easily available to minors.

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1 Did I read that correctly?

2 A. Yes.

3 Q. So you are again in this e-mail advocating that
4 books be restricting pending the challenge process,
5 correct?

6 A. Books that are submitted based on obscenities,
7 age-inappropriate or obscene content, yes.

8 Q. Thank you for the clarification.

9 And then do you see Mr. Adams forwards your
10 e-mail to Mr. Smith and writes: Superintendent, as per
11 our conversation, I'm requesting for you to quarantine
12 books that may contain age-inappropriate or obscene
13 content until they are reviewed and approved by the
14 district and board. I'm concerned that books with
15 inappropriate or obscene content could be checked out by
16 students without parents' approval.

17 Did I read that correctly?

18 A. Absolutely.

19 Q. So Mr. Adams is asking Mr. Smith here to
20 implement the policy for which you advocated, correct?

21 A. Yes.

22 MR. SAFIER: Okay. I'd like to mark this as
23 Exhibit 32.

24 (Baggett Exhibit 32 was marked for identification.)

25 BY MR. SAFIER:

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1 Q. Do you see this is a May 2nd, 2023 e-mail that
2 you sent?

3 A. Yes.

4 Q. And you copied on this e-mail Governor Ron
5 DeSantis, Manny Diaz, William Slayton, Kevin Adams,
6 David Williams, Paul Fetsko --

7 A. Steve Marcanio.

8 Q. -- Steve Marcanio, Michelle Salzman, Michelle
9 White, Keith Leonard, and I think that's it; is that
10 right?

11 A. Yes.

12 Q. So I'm going to read out the e-mail. You
13 write: Good morning. I am again asking you to please
14 do your job and make sure that your libraries adhere to
15 our district's own policies, which you worked so hard to
16 come up with, regarding removing and restricting books.
17 Just this morning, I can see that the librarian at West
18 Pensacola Elementary, Ms. Bradley Vinson, has failed to
19 restrict "New Kid" by Jerry Craft, and has actually
20 ordered an ebook version for students, a district
21 violation of what the board declared. She also has done
22 the same thing with the book "Drama." An ebook version
23 is available to her students as well. Both of these
24 were ordered after the board voted to remove these books
25 from the elementary libraries. Who approved this? Did

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1 you, Ms. White? If you did not, who signed off on these
2 purchases? I thought the policy was the library
3 committee must approve all new book purchases.

4 Did I read that correctly?

5 A. Yes.

6 Q. Okay. And so here, just to clarify, "New Kid"
7 and "Drama" are books that had been voted removed by the
8 school board, correct?

9 A. Yes.

10 Q. And then next paragraph: Secondly, she,
11 meaning Bradley Vinson, has not restricted several books
12 that have been submitted because of HB 7 and
13 HB 1557 violations, including "Too Bright to See," "Milo
14 Imagines the World," "Uncle Bobby's Wedding," "Hurricane
15 Child," "My Rainbow," "Better Nate Than Ever."

16 Did I read that correctly?

17 A. Yes.

18 Q. So is it your -- is what you're saying in this
19 e-mail that as of May 2023, the policy was that books
20 submitted because of HB 7 and HB 1557 were to be
21 automatically restricted during the review process?

22 MS. SMITH: Objection; form.

23 Q. Was that your understanding as of May 2nd,
24 2023?

25 A. We didn't have an understanding of it. That's

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1 what was not clear about 1557. We knew about 847 but
2 not 1557.

3 Q. Let me ask then a different way. What is HB 7?

4 A. It's -- if I remember correctly, it's part of
5 HB 1557. Anything that involves, again, sexual
6 discussions, things of that nature, in classroom
7 instruction and any book that is supplied for minors,
8 which I thought that also went for library books.

9 Q. Okay. And what about 1557, what is that?

10 A. Same thing.

11 Q. Okay. And was it -- so your position as of
12 May 2nd, 2023, was that books that are challenged on the
13 grounds that they violate HB 7 or HB 1557 should be
14 automatically restricted pending the challenge?

15 A. That's what we wanted to know.

16 Q. Okay.

17 A. A lot of us wanted to know, because it was not
18 clear.

19 Q. So you didn't know at this time what the policy
20 was about restrictions?

21 A. Ung-ugh. Ung-ugh.

22 Q. Do you know -- oh, sorry.

23 A. Well, you have to understand many had been
24 removed and then they were being put back on the shelf,
25 and so nobody understood what was going on with that.

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1 Q. Do you know as you sit here today what the book
2 "Too Bright to See" is? Do you recall that book?

3 A. Yes.

4 Q. What was your basis in this e-mail for saying
5 that book should be restricted pending the challenge
6 process?

7 A. I would have to go back and look at the book
8 again but it was that one that had alternate
9 sexualities, I do believe --

10 Q. What do you mean by that?

11 A. -- in that book.

12 Q. Is that -- did -- is your recollection that
13 that book has a transgender character in it?

14 A. I can't -- I think so. I think it may have.

15 Q. And is it your position that that in and of
16 itself would mean the book should be automatically
17 restricted?

18 A. That's what we -- a bunch of people who
19 submitted forms, that's what we all understood it to be.

20 Q. Okay. What do you recall about the book "Uncle
21 Bobby's Wedding"?

22 A. "Uncle Bobby's Wedding," I remember there was a
23 man who married another man in that wedding -- in that
24 book and actually had a wedding.

25 Q. And is it your position that that book should

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1 be automatically restricted pending the challenge?

2 A. Based on 1557, yes.

3 Q. Explain that to me.

4 A. 1557 said that there should be no -- in K
5 through 3 there should be no discussions of alternate
6 sexualities, gender confusion, et cetera.

7 Q. So alternate sexualities for you encompasses
8 any gay relationship, correct?

9 A. Well, that's sexual, yes.

10 Q. So the fact that the book depicts a wedding
11 between two men is enough to make it violate 1557, in
12 your interpretation?

13 A. In my interpretation, yes.

14 Q. And that is, again, your interpretation enough
15 to render the book such that it should be automatically
16 restricted, correct?

17 A. Based on my understanding of 1557.

18 Q. Do you know if the district agreed with you
19 about -- or sorry, scratch that.

20 Do you know if the school board agreed with you
21 about "Uncle Bobby's Wedding"?

22 MS. SMITH: Form.

23 A. I do not know.

24 Q. Do you know if that book was restricted in
25 Escambia libraries?

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1 A. That book is there on the shelves.

2 Q. As we sit here today?

3 A. Uh-huh.

4 Q. But was it ever restricted?

5 A. I do think when it was first submitted, it was
6 restricted, and then it was put back on the shelf after
7 a clearer understanding of 1557 came out.

8 Q. Do you agree with the decision to put it back
9 on the shelves?

10 A. No.

11 Q. Why do you think that's wrong?

12 A. Because I do not think that young children are
13 mature enough, and I also do not think that -- I think
14 parents should have the right for the say-so of whether
15 or not children should be exposed to that. Our MARC
16 reports in Destiny do not tell us what's in these books.

17 Q. Can you say that again? Your what reports?

18 A. The MARC reports.

19 Q. What are those?

20 A. In Destiny, the summaries.

21 Q. The marked reports. Got you.

22 A. MARC, MARC, M-A-R-C.

23 Q. Oh, okay.

24 A. MARC reports.

25 Q. That's a new term for me. Just can you -- I'm

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1 learning that term for the first time. Can you explain
2 to me what a MARC report is?

3 A. A MARC report is what a parent can go online
4 and see about a book and, hopefully, we want truthful
5 MARC reports. Unfortunately, many of our MARC reports
6 are not truthful at all. You might could look up that
7 book, you might could look up "My Rainbow" or "Better
8 Nate Than Ever" and it may not let the parents know that
9 the book contains alternate sexualities or so forth,
10 something that they may think that their child is too
11 young to deal with at the time.

12 MR. SAFIER: I'd like to mark this as
13 Exhibit 33.

14 (Baggett Exhibit 33 was marked for identification.)

15 BY MR. SAFIER:

16 Q. Do you see at the bottom of this e-mail chain
17 is an e-mail dated May 31st, 2023, from Tim Smith?

18 A. Yes.

19 Q. And in that e-mail is he announcing that he is
20 no longer going to be superintendent?

21 A. Yes.

22 Q. And he was fired; is that correct?

23 A. That's my understanding.

24 Q. And you write to him: Best wishes to you,
25 Dr. Smith.

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1 Correct?

2 A. Yes.

3 Q. And he writes back: Thank you Ms. Baggett.

4 Correct?

5 A. Yes.

6 Q. Now, was it your understanding that Mr. Smith
7 was removed by the school board, correct?

8 A. Yes.

9 Q. Do you know why he was removed?

10 A. No, I do not.

11 Q. Did you talk to any board members about his
12 removal ahead of his vote?

13 A. Nope.

14 Q. Ahead of the vote to remove him, I should say.
15 And your answer is no?

16 A. Absolutely not.

17 Q. What about after he was removed?

18 A. No.

19 Q. So you know -- you don't know anything about
20 why he was removed?

21 A. I do not.

22 Q. Did you want him to be removed?

23 A. No.

24 Q. Do you believe that books that feature gay
25 characters should not be in school libraries?

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1 A. I believe if they are going to be in school
2 libraries, I believe that -- especially in K through 3,
3 I believe that the MARC reports should state that there
4 are homosexual characters or alternate genders,
5 et cetera. That way parents will know and can decide if
6 they want their children to be exposed to that.

7 Q. So just, again, to get back to my original
8 questions. So it was a very broad question. So do you
9 think that books that feature gay characters should not
10 be in school libraries? I'm talking high school, middle
11 school, elementary school, any school library at all, a
12 book that features a gay character.

13 A. That's a loaded question. Elementary, no.

14 Q. Okay. And is elementary, in your
15 understanding, K through 3 or is it K through 5?

16 A. K through 3 is what I'm referencing, and for
17 immature students, I would say K through 5.

18 Q. So, again, to ask the same question, so your
19 position is that books that feature gay characters
20 should not be in school libraries for K through 5 kids
21 or K through 3?

22 A. K through 3 for certain, and in some cases K
23 through 5. It depends on the maturity level of the
24 student.

25 Q. What do you -- what kind of books do you think

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1 would be okay for fourth and fifth graders but not K
2 through 3 that feature gay characters?

3 A. Maybe those that don't have pictures of
4 characters touching, you know, things of that nature,
5 because a younger student who has not been exposed to
6 that may not understand that.

7 Q. So "Uncle Bobby's Wedding," I believe, and
8 let's assume that it does, it will be a hypothetical if
9 I'm wrong, shows a picture of two men getting married
10 and touching at the ceremony. Is it your position that
11 that book would be inappropriate for K through 5
12 libraries?

13 A. That is my position.

14 Q. Okay. Are there students in Escambia
15 elementary schools who have gay parents?

16 A. I don't know. How would I know that?

17 Q. Okay. Do you think it's likely that there are
18 some students in Escambia schools that have gay parents?

19 A. Just as it's likely that there are students who
20 do not, I'm sure, so yes.

21 Q. Okay. Do you think kids with gay parents
22 should have books about gay parents, should have access
23 to books about gay parents in school libraries?

24 A. If their parents want them to read those, then
25 the parents should -- they're available. I mean...

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1 Q. So your position is if the parents want their
2 kids to have access to books that depict gay couples,
3 they should purchase the books or acquire the books
4 outside the school library system but they shouldn't be
5 in school libraries for K through 3?

6 A. Right.

7 Q. And K through 5 if there are pictures that show
8 touching or anything like that?

9 A. Or depending upon the maturity level of the
10 student, yes.

11 Q. What about middle school libraries, is it
12 appropriate, in your opinion, to have --

13 A. I --

14 Q. Let me finish.

15 A. Okay.

16 Q. -- to have books that depict gay characters in
17 middle school libraries?

18 A. I do not think it is but my opinion is
19 irrelevant. You know, they are more mature, middle
20 school kids are more mature, so that's not something as
21 concerning to me.

22 Q. Why is your opinion irrelevant?

23 A. Because this is -- this should be based on law.
24 We should have laws reflecting this, and 1557 is a law
25 that was reflecting K through 3.

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1 Q. If there were a law that said K through 8, no
2 books that depict gay couples, would you support that
3 law?

4 A. I would, if there's a law.

5 Q. Yeah, but what I'm asking, would you support
6 the pass --

7 A. Yes, uh-huh.

8 Q. Would you support the passage of such a law?

9 A. Sure.

10 Q. What about K through 12, same question?

11 A. I would. I'm a -- I'm a Florida educator. I'm
12 bound by Florida law.

13 Q. Right, but I'm asking about your views. Your
14 view is you would support a law that banned books that
15 depict gay couples in any school library, K through 12,
16 correct?

17 A. No. No.

18 Q. Okay.

19 A. Because that would affect some of the classics,
20 so no, I would not. What the -- in high school, what
21 matters is the way that it is portrayed. Do you see
22 what I'm saying?

23 Q. Sure. Can you give me an example of a book at
24 the high school level that portrays a gay relationship
25 appropriately?

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1 A. That's appropriate.

2 Q. In your mind, yes.

3 A. "The Canterbury Tales."

4 Q. Okay.

5 A. You know, you have a gay character in "The
6 Canterbury Tales" but it's not graphic, it's very
7 subtle, and everybody who is reading this can certainly
8 figure out what's going on.

9 Q. Any other examples you can think of?

10 A. There are gay characters in all kinds of
11 literature but don't put me on the spot about it.

12 Q. I'm going to ask the same question about
13 transgender characters, so, again, beginning really
14 broadly, do you believe that books that feature
15 transgender characters books should not be in any school
16 library, and here we're talking K through 12?

17 A. No, I do not believe that they should be
18 limited to -- I think it's fine for high school.

19 Q. Okay.

20 A. I do. I do think it's fine for high school.
21 That's what I'm trying to say.

22 Q. So drill down a little bit. K through 3, you
23 don't think there should be any books that have
24 transgender characters in school libraries, correct?

25 A. I think that is too heavy for young minds.

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1 Q. What about K through 5?

2 A. I really think it's too heavy for K through 5
3 as well.

4 Q. What about 6 through 8?

5 A. I think that middle school students are more
6 impressionable than any other age group and, personally
7 speaking, if you're asking me personally, I don't think
8 that we need to have that for middle school kids, but I
9 know that we do and --

10 Q. Would you support a law that banned such books
11 from middle schools?

12 A. I would, uh-huh.

13 Q. Would you support a law that bans such books
14 from high school?

15 A. No.

16 Q. So that's where you draw the line, is ninth
17 grade?

18 A. Yes. I think kids are way more mature to
19 handle those things at the high school level.

20 Q. Again, I'm going to begin really generally and
21 then we'll drill down. Do you believe that books that
22 discuss discrimination by Whites against Blacks should
23 not be in school libraries?

24 A. In K through 3, I do not believe we need
25 any book -- actually, K through 5.

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1 Q. Okay.

2 A. I don't think any race should be pitted against
3 another race.

4 Q. So any book about or that depicts racism should
5 not be in K through 5 libraries, correct?

6 A. Yes, that's what I think.

7 Q. Sure.

8 A. But again, I don't make the laws.

9 MS. REGAN: I think that was a different
10 question. Would you ask it again, please?

11 MR. SAFIER: Can you read my question?

12 THE COURT REPORTER: So any book about or that
13 depicts racism should not be in K through 5
14 libraries, correct?

15 A. I think any book that pits one race against
16 another should definitely not be in elementary school.

17 Q. Sure. But my question is is a book that's
18 about or that depicts scenarios that involve racial
19 discrimination, do books like that, in your view, depict
20 one race against another?

21 A. It depends on how it's written.

22 Q. So you're -- and getting -- we're just trying
23 to get a sense of your views, so I want to ask this
24 again. So if -- do you think that a book that talks
25 about racism in America at some point in time is

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1 inappropriate for K through 5?

2 A. It depends on the content.

3 Q. Okay. Fair enough. What about middle school?

4 A. Depends on the content.

5 Q. And high school, your answer is the same?

6 A. (Nodding head.)

7 Q. So there could, in theory, could be a book
8 about someone's experience with racial discrimination
9 that would be appropriate for K through 3?

10 A. Yes, I think it depends on the content and the
11 way that it's written, sure.

12 Q. And the specific books that deal with racism
13 you objected to, you think that they are inappropriate
14 why?

15 A. Because they pitted one race against another
16 and we just -- what does that -- what good does that do
17 in our society? I think high schoolers, even middle
18 schoolers, are able to handle that, but elementary, no.

19 Q. I'm going to ask a very broad question right
20 now. What do you think the purpose of a school library
21 is?

22 A. Research, reading, of course, finding
23 information about things, pleasure. The list goes on
24 and on.

25 Q. Do you think it is important for kids to be

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1 able to find books in their libraries that speak to
2 their specific experiences?

3 A. I think that's very important with -- in a
4 public school library, though, with parental consent for
5 younger kids.

6 Q. Okay. So getting to a hypothetical we
7 discussed before, if you're a kid with two gay parents
8 and you want to read a book about that, your view is
9 they should be allowed to with parental consent, or is
10 your view that they should be allowed to if their
11 parents purchased the book or acquire it for them
12 outside the library?

13 A. I think K through 3, you know, again, why do we
14 have those, but beyond that, parental consent.

15 MR. SAFIER: I'd like to mark this as
16 Exhibit 34.

17 (Baggett Exhibit 34 was marked for identification.)

18 BY MR. SAFIER:

19 Q. Do you see at the bottom there's an e-mail from
20 an account with the name Every Library with the e-mail
21 address kosi-harrispr@gmail.com?

22 A. Yes.

23 Q. And that person e-mailed something to someone,
24 sherry@atmorenews.com, do you see that?

25 A. Yes.

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1 Q. Who is Every Library, if you know, who is that
2 person?

3 A. I do not know that person.

4 Q. Who is sherry@atmorenews?

5 A. Sherry is the editor for the Atmore News.

6 Q. And what is the Atmore News?

7 A. That is a newspaper in Alabama.

8 Q. Ah. Got you. So Sherry Digmon, that's her
9 name, correct?

10 A. Uh-huh.

11 Q. Writes to you: Vicki, I read some of this but
12 not all. Thought you might find interesting. I have
13 never heard of this group before I got this e-mail. I
14 realize this doesn't pertain to school libraries, but
15 still.

16 Correct?

17 A. Yes.

18 Q. And you write: Thank you for this. I am
19 meeting with a State rep tomorrow night about
20 dissociation with the ALA.

21 What state rep?

22 A. I didn't meet with them.

23 Q. Okay. Who were you supposed to meet with?

24 A. I don't even know. I don't even remember.

25 Q. And then you write: Every Library is part of

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1 the ALA.

2 A. Yes.

3 Q. And you write: This group is evil. We have to
4 keep fighting.

5 A. Yes.

6 Q. Do you believe the ALA is evil?

7 A. Well, that was -- that's my opinion.

8 Q. Okay. And what's -- elaborate. What's the
9 basis for that opinion?

10 A. I think anybody who wants to keep books about,
11 you know, pegging each other and books about becoming
12 transgender when you're in third grade, putting these
13 ideas into the minds of minors, I think that's evil, I
14 certainly do.

15 MR. SAFIER: I'd like to mark this as
16 Exhibit 35.

17 (Baggett Exhibit 35 was marked for identification.)

18 BY MR. SAFIER:

19 Q. So what I put before you is a challenge form
20 you filled out for the book "And Tango Makes Three,"
21 correct?

22 A. Yes.

23 Q. Do you recall how this book got in your radar
24 screen as one you would challenge?

25 A. I do not recall.

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1 Q. Okay. And you write as your reasons for
2 objections: LGBTQ agenda using penguins.

3 Did I read that correctly?

4 A. Yes.

5 Q. In what way, to the extent that you recall,
6 does this book promote the LGBTQ agenda?

7 A. There is one line in the book where the
8 penguins, the two male penguins are -- their necks are
9 wrapped around each other and the zookeeper says "they
10 must be in love." Is the subliminal message, the subtle
11 message, I guess you should say.

12 Q. So what do you think the message of the book
13 is? What is the subtle or subliminal message?

14 A. That it's okay -- we're putting in front of
15 pre-K through third grade kids that's it's -- it's a
16 push for, hey, it's okay for two men to be in love,
17 something that some parents may not want the school to
18 push.

19 Q. And do you disagree with that message, that's
20 it's okay for two men --

21 A. My opinion --

22 Q. Let me finish.

23 A. Okay. Sorry.

24 Q. Do you disagree with the message that it's okay
25 for two men to be in love?

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1 A. Men can do whatever they want to do. The issue
2 is should we put this in front of minor children.

3 Q. In response to the question, "What do you
4 believe is the purpose of this educational media?" you
5 wrote: Indoctrination.

6 Is that correct?

7 A. Yes.

8 Q. What's your basis for viewing the purpose of
9 this book as indoctrination?

10 A. Because it's a push to get this idea into the
11 minds of pre-K through actually fifth graders.

12 Q. This book was removed by the school board,
13 correct?

14 A. Correct.

15 Q. And you agreed with that decision?

16 A. Yes.

17 Q. What is your understanding of why the book was
18 removed?

19 A. Because it was a form of pushing this idea in
20 front of minor children, and parents did not agree with
21 the idea.

22 Q. And what's your basis for understanding that is
23 why the book was removed?

24 A. Because I remember at the board meeting it
25 seems like some of the board members said that they had

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1 been contacted that parents did not agree with this
2 book.

3 Q. Did you ever discuss this book with any board
4 member?

5 A. No, not that I recall.

6 Q. Fair enough.

7 A. Unless I sent them copies of, you know, my -- I
8 did send copies of my e-mails when I filed complaints.

9 Q. So if you communicated with the school board
10 about "Tango," it would have been in the context of
11 e-mailing them your complaint and your challenge, not
12 speaking on the phone, texting, that kind of thing?

13 A. Right.

14 Q. I got you.

15 A. That's what I remember.

16 MR. SAFIER: What number?

17 THE COURT REPORTER: 36.

18 MR. SAFIER: I'd like to mark this as
19 Exhibit 36.

20 (Baggett Exhibit 36 was marked for identification.)

21 BY MR. SAFIER:

22 Q. Am I correct that this is a challenge form that
23 you filled out for the book "New Kid" by Jerry Craft?

24 A. Yes.

25 Q. And you wrote as your reasons for objections:

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1 Race-baiting, anti-Whiteness.

2 A. Yes.

3 Q. What is your -- to the extent that you recall,
4 what was your basis for accusing the book of indulging
5 in race-baiting or anti-Whiteness?

6 A. And I'm trying to remember. Is this the one
7 about the two brothers and one looks Black and one looks
8 White and -- I'm thinking that's what it is.

9 Q. I'll show you more, and I don't think it is,
10 but -- so let's just get on the record, so your reasons
11 for objection were race-baiting and anti-Whiteness,
12 correct?

13 A. Yes.

14 Q. And when you wrote what do you -- in response
15 to the question, "What do you believe is the purpose of
16 this educational media?" you wrote: Woke agenda;
17 race-baiting.

18 Right?

19 A. Yes.

20 Q. So you believe, at least at the time you filled
21 this out, you believe that those were the purposes of
22 this book?

23 A. Yes.

24 MR. SAFIER: Okay. I'd like to mark this as
25 Exhibit 37.

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1 (Baggett Exhibit 37 was marked for identification.)

2 A. Oh, good. We have more about it.

3 MR. SAFIER: Can we go off the record for one
4 second?

5 THE VIDEOGRAPHER: Sure. Stand by. Going off
6 the record. The time is 12:06 p.m.

7 (Recess from 12:06 p.m. until 12:22 p.m.)

8 THE VIDEOGRAPHER: We are now on the record.
9 The time is 12:22 p.m.

10 BY MR. SAFIER:

11 Q. So, Ms. Baggett, before we broke we were
12 looking at your challenge form for "New Kid," and as you
13 know, we discussed your stated reasons for objections
14 were race-baiting, anti-Whiteness, and your statement of
15 what you believe the purpose of the book is was woke
16 agenda and race-baiting.

17 Did I summarize that correctly?

18 A. Yes.

19 Q. And at the time you didn't recall exactly what
20 "New Kid" was about. During the break were you able to
21 refresh your recollection?

22 A. Yes.

23 Q. So tell me what the book "New Kid" is about?

24 A. Well, the reason that I submitted the book was
25 because in the book there were many innuendos with

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1 stereotypes for races, and I put that in the appeal.
2 The pictures that were used, the assumption -- like in
3 the pictures that I used, you've got in the library,
4 there were specific sections like for -- for --

5 (Telephone audio interruption.)

6 MR. SAFIER: Can you -- sorry. Can we go off
7 the record for one second?

8 THE VIDEOGRAPHER: Yes. Going off the record.
9 The time is 12:23 p.m.

10 (Recess from 12:23 p.m. until 12:24 p.m.)

11 THE VIDEOGRAPHER: We are back on the record.
12 The time is 12:24 p.m.

13 BY MR. SAFIER:

14 Q. So, as you were saying?

15 A. In -- like, there was a page that had pictures,
16 a section in the library, that was an advertisement for
17 the African American kids. The books had assumptions,
18 stereotypical things, like how to escape poverty, how
19 to, you know, escape slavery, and I remember, if I'm
20 thinking correctly, there was a part even in this book
21 where a Black student would receive for his prize, if he
22 got the answer correct, a ticket from KFC.

23 It was not just one race singled out. There
24 were a lot of other races singled out. It was about
25 stereotypes. So in this book -- this book was submitted

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1 because K through 3, of course why would we want to do
2 this, why would we -- again, why would we want to pit
3 one race against another, especially based on laws that
4 we have? This is something we're not supposed to do.

5 Q. If I recall correctly, the plot of the book
6 involves a Black kid going to a --

7 A. A White school.

8 Q. Right, a White school, and some of the racial
9 stereotyping he encountered and some of the trouble that
10 he has adjusting to a different environment. Is that a
11 fair summary of the plot?

12 A. Yes. Uh-huh.

13 Q. Do you object to a book about that subject
14 matter?

15 A. No.

16 Q. So you think, in theory, a book that discussed
17 in fictional form some of the racism that a Black
18 student might encounter at a private White school could
19 be acceptable to be in libraries?

20 A. Absolutely. As I said earlier, it depends on
21 the content and the context in which it's presented and
22 the grade level to which it is presented.

23 Q. So do you think a book like that -- I guess
24 what is the -- let's just assume -- let's stick with the
25 plot of the book and not talk about any of the specific

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1 language that you are highlighting, but it's a book
2 about a Black student who goes to a predominantly White
3 private school and experiences racism. Right? Do you
4 think a book just like that would be appropriate for K
5 through 3?

6 A. As long as it did not have racial stereotypes,
7 yes.

8 Q. Okay. How did this book come to your
9 attention?

10 A. I don't remember. I don't even remember when
11 I -- I would have to go back and look at the form to see
12 when I submitted it. Let's see.

13 Q. August --

14 A. August of '22, so almost two years ago. So no,
15 I do not remember how this book came to my attention.

16 Q. Okay.

17 MS. REGAN: Thank you.

18 MR. SAFIER: I'd like to mark this as
19 Exhibit 38.

20 (Baggett Exhibit 38 was marked for identification.)

21 BY MR. SAFIER:

22 Q. This is a challenge form you filled out for the
23 book "Drama," correct?

24 A. Yes.

25 Q. Do you recall how this book got on your radar

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1 screen?

2 A. I believe this one was one where a parent
3 actually alerted me to this book.

4 Q. Okay.

5 A. If I recall.

6 Q. Do you -- and you might not, but do you recall
7 what parent?

8 A. No, I do not.

9 Q. I want to go back and ask a question about "New
10 Kid" which I forgot to ask. That book was removed by
11 the school board, correct, "New Kid"?

12 A. I think so, yes.

13 Q. And you agree with that decision?

14 A. Base -- yes, based on -- based on the HB 7,
15 yes.

16 Q. Do you know why it was removed?

17 A. My assumption is because of the social
18 stereotypes and the racial stereotypes that were
19 presented.

20 Q. Thanks. That's helpful. All right. Going
21 back to the "Drama" challenge form, and you might not,
22 this isn't a test, but do you recall what the plot of
23 the book "Drama" is?

24 A. Yes. That is the one where it's middle school
25 students and they're actually in a drama club, if I

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1 recall, and at the end of the book you have a boy who is
2 dressed as a soldier and then a boy who is dressed as a
3 girl and the two kiss, I believe.

4 Q. And they kiss as part of the play, correct?

5 A. Yes, but, of course, the -- yes, that's
6 correct. That's correct.

7 Q. Okay. And so the reasons for objections, you
8 wrote: Indoctrination of LGBTQ; age-inappropriate and
9 content not relevant.

10 Correct?

11 A. Yes.

12 Q. Do you know -- what's your basis for your
13 position that this book involves indoctrination of
14 LGBTQ?

15 A. If I recall, in the picture at the end of the
16 book, where the two boys are kissing, even though
17 they're in a play, the artist depicts this with hearts
18 and so forth, and so, again, that would be a violation
19 of HB 7.

20 Q. So is it -- I guess -- so it's your position
21 that this book should be removed from K through 3
22 class -- or libraries, right?

23 A. If I recall, there was not a -- I can't
24 remember if there was grade limit at the time --

25 Q. Got you. Got you.

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1 A. When this -- when the HB 7 and HB 1557 came
2 out, so I'm not aware.

3 Q. So looking at your response to 7 on the
4 challenge form, the question is "Where was the
5 educational media located in the school system?" and you
6 wrote: Elementary and middle schools.

7 A. Yes.

8 Q. So this book, at least at the time you
9 challenged it, was available in elementary and middle
10 schools, correct?

11 A. Yes.

12 Q. And is it your view that should not be
13 available in elementary or middle school libraries?

14 A. Based on the law, because when it first came
15 out we thought it was, you know, K through 8.

16 Q. Okay. Is that still your position?

17 A. Well, I mean, again, it depends on the maturity
18 of the student. Definitely K through 3 for me, but,
19 again, who cares about my personal opinion.

20 Q. A lot of people do, apparently.

21 A. I don't know.

22 Q. But no, I want to ask you a question about
23 that, which is when -- I mean, some of your challenges
24 are clearly expressing your opinions about what books
25 are and are not appropriate for libraries, correct?

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1 A. If you say so.

2 Q. Well, I'm not --

3 A. I try to pull -- I try to pull in content so
4 that the reader can -- you know.

5 Q. Sure. And we're not -- we're not assessing
6 here whether your opinions are valid or not valid, but
7 what I'm saying is your challenge forms aren't just
8 limited to legal analysis, you're not writing legal
9 briefs, you're expressing opinions about what books are
10 appropriate, correct?

11 A. Yes.

12 Q. And you think your opinions are valid and
13 correct, like everyone does about their own opinions,
14 correct?

15 A. Right. As a taxpaying citizen, I have the
16 right to present the challenges, so...

17 Q. Right. And you think if you had your druthers,
18 and it's a complex democratic society, maybe you don't,
19 but you would want your opinions to -- you would want
20 what books are in school libraries to reflect your
21 opinions, correct?

22 A. I am one opinion. So, I mean, I would want my
23 opinion to be put out there but, again, the community
24 needs to decide.

25 MR. SAFIER: I'd like to mark this as

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1 Exhibit 39.

2 (Baggett Exhibit 39 was marked for identification.)

3 BY MR. SAFIER:

4 Q. So this is a document you submitted entitled
5 "Additional Evidence for 'Drama'." Correct?

6 A. Yes.

7 Q. And at the bottom of this, is this the picture
8 you were referring to?

9 A. Yes.

10 Q. Are those hearts?

11 A. No. They're like little squirrelly things.

12 Q. What is inappropriate about that picture?

13 A. The squirrelly things, of course, are
14 indicative of hello, they're kissing, whatever. Look at
15 the content that I've put in here.

16 Q. All right. Let's read it out. That's a very
17 good suggestion. So you have, for the record, in
18 addition to the illustration we talked about with the
19 squirrellies, you have pulled up three quotes from the
20 book. I'm going to read them out: "When you say he's
21 cute, do you mean like ... like I like boys? Oh. Um,
22 is that cool? Is it okay that I told you? It's cool ..
23 I guess I was never really sure if anyone I knew was
24 actually ... um ... gay? You can say it. I don't
25 mind."

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1 That's the first quote from page 65.

2 The next quote: "Has he ever had a girlfriend?
3 I don't think so ... Maybe he's just a late bloomer. He
4 wouldn't hang around with you so much if he didn't like
5 you. Maybe. Or maybe he's ... no, nevermind. What?
6 Gay?" Page 117.

7 And the last quote: "Wes still doesn't know if
8 he's really gay, or I dunno, bi, or whatever." Page
9 222.

10 Did I read those out correctly?

11 A. Yes.

12 Q. And is it your position that those three quotes
13 render this book inappropriate for middle school or
14 elementary school libraries?

15 A. Based on 1557 and HB 7 at the time, yes.

16 Q. Let's put the statutes aside and just talk
17 about your opinions as Ms. Baggett. Is your opinion
18 that based on these quotes and in the picture, this book
19 should not be in elementary or middle school libraries?

20 A. Elementary.

21 Q. Just elementary?

22 A. Yes.

23 Q. And elementary being K through 5 here?

24 A. Yes.

25 Q. Okay.

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1 A. But once again, I'm going to restate what I
2 said earlier. My personal belief, K through 3
3 definitely should not be because they're not mature
4 enough to understand, and then it depends on the
5 maturity level for fourth and fifth graders.

6 Q. In connecting this additional evidence form to
7 your original challenge form, it's your view that the
8 picture and quotes that we just read out constituted
9 indoctrination of LGBTQ, correct?

10 A. Yes.

11 Q. Do you know where -- we looked at these quotes
12 from this page. Do you know where you pulled these
13 quotes?

14 A. No.

15 Q. Is it possible you pulled it from Book Looks?

16 A. I don't know. There -- I also go -- all the
17 time I go -- I find PDFs online and I cut and paste PDFs
18 online.

19 Q. Got you. Got you.

20 MR. SAFIER: We'll just do this really quickly
21 but can you mark this as Exhibit 40.

22 A. Because it saves time typing.

23 Q. Understood.

24 (Baggett Exhibit 40 was marked for identification.)

25 BY MR. SAFIER:

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1 Q. Now, if you could, just once you have
2 Exhibit 40 in front of you, compare the quotes that are
3 included in this book -- sorry. I'll go back to this.

4 MR. SAFIER: What number are we?

5 Q. So Exhibit 40 is the Book Looks entry for the
6 book "Drama," correct?

7 A. Yes.

8 Q. And then if you look at the second page in the
9 exhibit, there are a bunch of quotes that the Book Looks
10 pulls up, correct?

11 A. Yes.

12 Q. And there are three quotes and two references
13 to pictures, correct?

14 A. Yes.

15 Q. And the quotes identified on the Book Looks
16 entry are identical to the quotes that you've put in
17 your additional evidence form, correct?

18 A. It looks like it but I don't reference -- they
19 are saying something about an illustration on Page 10.
20 I didn't reference that, so, again, that's an
21 assumption.

22 Q. Yeah. So it's possibly you cut and pasted that
23 from Book Looks?

24 A. But it's also possible I didn't.

25 Q. Okay. Understood.

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1 MR. SAFIER: Okay. I'd like to mark this as
2 Exhibit 41.

3 A. Or 40?

4 (Baggett Exhibit 41 was marked for identification.)

5 BY MR. SAFIER:

6 Q. Ms. Baggett, do you agree that Exhibit 41 is a
7 challenge form you filled out with respect to the book
8 "Two Boys Kissing" by David Levithan?

9 A. Yes.

10 Q. How did this book get on your radar screen?

11 A. I think this is one I found at the public
12 library.

13 Q. You write for reasons for objections: LGBTQ
14 push/indoctrination; bestiality; suicide; victimization.
15 Did I read that correctly?

16 A. Yes.

17 Q. And you may not recall but --

18 A. I don't.

19 Q. -- what is the reference to bestiality in the
20 book?

21 A. I don't recall that about this book. I would
22 have to go back and look at this book.

23 Q. Do you remember the plot of this book?

24 A. Very little of the plot.

25 Q. Okay. But --

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1 A. I've read a lot of his books, though.

2 Q. Understood. Do you like his books?

3 A. They're okay. The plots are good.

4 Q. And you wrote under the purpose of educational
5 media: Indoctrination.

6 Right?

7 A. Uh-huh.

8 Q. And when you say where was the educational
9 media located in the high school system, you wrote:
10 High schools.

11 Correct?

12 A. Yes.

13 Q. So your position, at least as stated in this
14 challenge form, is that this book shouldn't even be
15 in high school libraries, correct?

16 A. If it contains bestiality, no, because that's a
17 violation of 847.

18 Q. But you're -- right. So this book -- your
19 understanding, based on this form, is that this book was
20 only available in high school libraries?

21 A. Yes.

22 Q. Not elementary school libraries?

23 A. Right.

24 Q. And you think it should be removed even from
25 those libraries, correct?

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1 A. If it contains bestiality, yes.

2 Q. Which you're representing it does?

3 A. Right. I just don't recall what --

4 Q. If it doesn't contain bestiality but just
5 involves gay relationships and struggles that gay
6 teenagers might face, is it your view that it then is
7 okay to be in a high school library?

8 A. As long as it's not graphic sexual content,
9 then it's wouldn't be a violation of 847.

10 Q. So your view is that a book that depicts gay
11 high school students not having graphic sex but maybe
12 having crushes on each other, maybe they hold hands,
13 would a book like that be acceptable in a high school
14 library?

15 A. Yes. Again, it depends on the content.

16 MR. SAFIER: I'd like to mark this as
17 Exhibit 42.

18 (Baggett Exhibit 42 was marked for identification.)

19 BY MR. SAFIER:

20 Q. Do you agree that this is a challenge form for
21 the book "Uncle Bobby's Wedding"?

22 A. Yes.

23 Q. Did you submit this challenge form?

24 A. Let me see. No. Kay Dickerson did.

25 Q. Who is Kay Dickenson -- Kay Dickerson?

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1 A. She is a -- I believe she's a former teacher.

2 Q. Do you know her personally?

3 A. Just her name.

4 Q. Did you talk to her about this book?

5 A. Yes.

6 Q. Tell me about that conversation.

7 A. Just that I was glad she submitted it.

8 Q. Did you talk to her before they submitted this
9 challenge or after?

10 A. After.

11 Q. Okay. So you didn't encourage her or prompt
12 her to file this challenge?

13 A. No, not that I recall, no.

14 MR. SAFIER: I'd like to mark this as
15 Exhibit 43.

16 (Baggett Exhibit 43 was marked for identification.)

17 MS. REGAN: Thank you. Really, thank you.

18 BY MR. SAFIER:

19 Q. Do you agree this is a challenge form along
20 with some of the appeal documents for "When Aidan Became
21 a Brother"?

22 A. Yes.

23 Q. Do you recall this book?

24 A. Yes.

25 Q. What's it about?

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1 A. I know it's about Lukoff. Oh, yeah, the boy
2 who dresses like a girl, I think.

3 Q. Is it your understanding that this book has a
4 transgender character?

5 A. Yes.

6 Q. You write under what you believe is the purpose
7 of this educational media: Indoctrination of LGBTQ.

8 Correct?

9 A. Yes.

10 Q. Is it your view that the fact that it has a
11 transgender character means that its purpose is
12 indoctrination of LGBTQ?

13 A. If we're pushing it in our younger minds, yes.

14 Q. Can you turn to -- one two three -- the fourth
15 page of this document?

16 A. Okay.

17 Q. Do you see that there -- you reference four
18 different books?

19 A. Yes.

20 Q. I want to look at the last one, "Stella Brings
21 the Family." Do you recall that book?

22 A. Yes.

23 Q. Okay. I want to read out the quotes that you
24 identify: "But Stella had two dads. Everyone else had
25 a mother. Howie had two! 'Daddy and Papa read stories

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1 to me,' said Stella ... 'I got lots of kisses when I'm
2 hurt. Either from Papa or Daddy or Nonna or Aunt Gloria
3 or Cousin Lucy...' The party was better than
4 Stella had imagined. Howie came with his two moms, and
5 Jonathan brought his grandmother while his mom was away.
6 Stella had the biggest crowd of all. Papa was a big
7 hit."

8 Did I read that correctly?

9 A. Yes.

10 Q. Is it your view that those passages render that
11 book inappropriate for an elementary school?

12 A. For K through 3, yes.

13 Q. What about K through 5?

14 A. Based on, at the time, based on 1557, yes.

15 Q. And if there were no 1557, would that still be
16 your opinion?

17 A. For K through 3, yes.

18 Q. What about for K through fourth and fifth
19 grade?

20 A. If the student is mature enough and with
21 parental consent.

22 Q. Okay.

23 MR. SAFIER: I'd like to mark this as

24 Exhibit 44.

25 (Baggett Exhibit 44 was marked for identification.)

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1 BY MR. SAFIER:

2 Q. This is a challenge form that you filled out
3 for the book "Out of Darkness," correct?

4 A. Yes.

5 Q. Do you recall this book?

6 A. Yes.

7 Q. What do you recall about the plot?

8 MS. SMITH: Excuse me.

9 MS. REGAN: Bless you.

10 THE WITNESS: Bless you.

11 A. I think this is the one about the rape of a
12 young girl, if I recall. Yes.

13 Q. So this book depicts rape of a minor, correct?

14 A. Yes.

15 Q. And do you think that in and of itself renders
16 the book inappropriate for high school kids?

17 A. I think it was very graphic, but that's not the
18 only reason that I felt -- that I submitted this book.

19 Q. What are the other reasons?

20 A. The derogatory comments, racial comments, the
21 profanity, the sexual comments, phrases like "you
22 nigger-loving cunt," "Mexicans are retarded." I mean,
23 why would we offer this?

24 Q. Just focusing on that last one, Mexicans are
25 the R word, is it your understanding that that is a view

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1 the author was expressing about Mexicans, or is it a
2 view that she was putting in the voice of a character
3 depicted as racist?

4 A. Yes, I know -- I know what she was doing, but
5 the thing is -- and that was just one of several. There
6 were a lot of racial comments in here. It was primarily
7 the sexual content.

8 Q. So getting back to that, the book depicts
9 sexual rape of a minor. Do you think it's intended to
10 be sexually titillating, this book?

11 A. No. No.

12 Q. Do you think this book is pornographic?

13 A. I think -- no. I think that this book is --
14 this book is abhorrent and prurient, and I think that
15 this book might be a trigger book for someone maybe who
16 has gone through this perhaps.

17 Q. I want to unpack that. What do you mean when
18 you say this book is prurient?

19 A. I mean it's -- did you read some of these?

20 Q. I did.

21 A. It's -- it's just -- it's -- this is one of
22 those that the community, I think, would need to decide
23 yea or nay.

24 Q. But getting back to the rape part, just that
25 piece, it's not your view that rape as depicted in this

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1 book for purposes of titillation, correct?

2 A. No.

3 Q. Okay. It's depicted to show that this is an
4 awful thing that happens to young women, correct?

5 A. Right. Right.

6 Q. Do you think that's an appropriate subject
7 matter for a book?

8 A. Again, it depends on the way that it's
9 portrayed. It's explicit. There are scenes in this
10 book of masturbation, which that's a violation of 847,
11 so...

12 Q. Is it a violation of H -- which law again?

13 A. 847.012.

14 Q. 847. Is it a violation of 847 for such a book
15 to be offered in a high school?

16 A. Masturbation, yes.

17 MR. SAFIER: I'd like to mark this as

18 Exhibit 45.

19 (Baggett Exhibit 45 was marked for identification.)

20 BY MR. SAFIER:

21 Q. This is the challenge form you submitted for
22 "All Boys Aren't Blue," correct?

23 A. Yes.

24 Q. Do you know how this book got on your radar
25 screen?

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1 A. Yes.

2 Q. How?

3 A. I found it myself.

4 Q. How did you find it?

5 A. At the library.

6 Q. You were just in the library perusing books?

7 A. Yes. Actually, it was -- it was on the shelf.

8 It was on the shelf at a library in Foley and I decided
9 to read it. It was one I had not read.

10 Q. Had you heard of it before you picked it up?

11 A. Uh-huh. Yes, I had.

12 Q. How had you heard of it?

13 A. I heard some students, I believe, talking about
14 it.

15 Q. And what were they saying?

16 A. Just that they had read the book and that it
17 was graphic. That's all they said. They didn't say yea
18 or nay.

19 Q. Before you picked up the book to read, were you
20 aware that it had been challenged in other school
21 districts?

22 A. I don't know that I was. I don't remember that
23 part.

24 Q. Do you recall what this book is about?

25 A. I remember it was about a guy's first gay

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1 sexual experience, and what I remember the most about
2 this book is that his condom was bubble gum flavor.

3 Q. You don't recall anything else?

4 A. I just remember it was extremely graphic, yes.

5 Q. Okay. And this book was removed by the
6 Escambia County School District, correct?

7 A. Yes.

8 Q. And you support that decision?

9 A. Absolutely.

10 Q. Do you know why it was removed?

11 A. Because of the sexual graphic content.

12 Q. What is your basis for that belief?

13 A. Because of the content that's in the book.

14 Q. Right. But you -- I'm asking whether any
15 school board member told you or anything like that?

16 A. Oh, no, ung-ugh.

17 Q. Okay. So you're just -- your supposition is
18 that that's why it was removed?

19 A. Yeah, that's what I'm assuming.

20 Q. Okay.

21 A. Because when -- I remember they -- at the board
22 meeting, they did not even want to read the lines out
23 loud because they were graphic.

24 MR. SAFIER: I'd like to mark this as

25 Exhibit 46.

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1 (Baggett Exhibit 46 was marked for identification.)

2 BY MR. SAFIER:

3 Q. This is the challenge form that you filled out
4 for the book "The Bluest Eye," correct?

5 A. Yes.

6 Q. And under the strengths of educational media
7 you wrote: None.

8 Is that your view?

9 A. Yes.

10 Q. Do you think everyone shares that view about
11 this book?

12 A. Does -- I don't know how everyone thinks. This
13 was my form, so it was my view.

14 Q. Understood. Are you aware that this book has
15 won awards?

16 A. Irrelevant.

17 Q. Do you think that -- do you think that the
18 people who think this is a book of great literary value,
19 that they should have any say about whether it appears
20 in high school libraries?

21 A. If they want to, sure, but again, we have to
22 follow the law.

23 Q. What's -- and what law do we have to follow in
24 this context?

25 A. 847.012. This book contains graphic scenes of

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1 sex and rape scenes.

2 Q. Now, this book -- when this book depicts rape,
3 it's not for the purpose of sexual titillation, correct?

4 A. Correct, but if I recall -- if I recall, I'm
5 thinking now -- and I may be getting it mixed up with
6 "Push," both of these books were extremely graphic.
7 There is a scene -- again, I may be getting it mixed up
8 and I'm speaking out of turn, but there is a scene where
9 a child is having sex with an adult and the child
10 orgasms and it's in description.

11 Q. But you don't recall whether that's "The Bluest
12 Eye" or "Push" for some other book, correct?

13 A. Correct.

14 Q. You wrote here: Pedophilia.

15 Do you recall whether that's because the book
16 depicts nonconsensual incest?

17 A. Yes.

18 Q. Okay. And it's not promoting nonconsensual
19 incest, correct?

20 A. If I recall, this book was -- that section was
21 written from the view -- and I'm, again -- from the view
22 of the perpetrator, and we do not see any sorrow from
23 the perpetrator's point of view, which was extremely
24 alarming.

25 Q. Isn't that something that actually could happen

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1 in real life, that a perpetrator would commit horrible
2 acts and not feel bad about it?

3 A. Sure, but do we want that in front of our
4 minors in our public school libraries?

5 Q. Isn't that something that literature can
6 depict?

7 A. Literature can depict anything. It's the
8 context in which it's depicted that counts.

9 Q. But your -- is it your position, granted, we
10 don't have the book in front of us, but is it your
11 position that this book promotes pedophilia?

12 A. It is my -- it is my position that this book
13 does not have any sorrow from the point of view of the
14 perpetrator, almost as if it's a good thing for this
15 victim.

16 Q. Might that be a literary device?

17 A. Again, sure, but again, does that make it
18 appropriate for minor children.

19 Q. Unfortunately, pedophilia is a thing that
20 happens in the world, correct?

21 A. Correct.

22 Q. Do you think that, for that reason, do you
23 think it's something that it's important for literature
24 to depict?

25 A. There are many things that are important but,

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1 again, you have to look at the context. Did this
2 violate the law? Is this appropriate for minor
3 children? My viewpoint was that it was not.

4 Q. Okay. And minor children includes all --

5 A. Yes.

6 Q. -- school-age children?

7 A. Yes. This was found in both middle and high
8 school.

9 Q. And you wrote under "What do you believe the
10 purpose of this educational media is?" you wrote:
11 Shock.

12 Right?

13 A. Yeah.

14 Q. That's your view. I just want to ask you one
15 thing.

16 MR. SAFIER: Can we mark this as Exhibit 47?

17 (Baggett Exhibit 47 was marked for identification.)

18 BY MR. SAFIER:

19 Q. One quick question about this. Is this your
20 handwriting on this document?

21 A. Yes.

22 Q. That's all I have.

23 MR. SAFIER: Can we mark this as Exhibit 48?

24 (Baggett Exhibit 48 was marked for identification.)

25 BY MR. SAFIER:

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1 Q. This is a challenge form you filled out for a
2 book called "The Hate U Give," correct?

3 A. Yes.

4 Q. And you wrote about that book --

5 A. Where did this come from, by the way? Was this
6 part of a challenge?

7 Q. I believe so but I'm not in a position to make
8 a representation. I was just asking whether that was
9 your handwriting.

10 MS. REGAN: Referring to 47.

11 Q. Okay. Do you have the Exhibit --

12 MR. SAFIER: What number?

13 THE COURT REPORTER: 48.

14 Q. -- 48 in front of you? Yep?

15 A. Okay.

16 Q. This is the challenge form you filled out to
17 the book "The Hate U Give," correct?

18 A. Yes.

19 Q. And one of the reasons for your objections was
20 anti-cop agenda, correct?

21 A. Yes.

22 Q. Does that render a book inappropriate for
23 middle school libraries?

24 A. Again, is that something -- is that
25 educationally suitable for middle school kids? This

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1 book was actually found in middle schools.

2 Q. Do you think kids who are middle school age
3 have encounters with the police ever?

4 A. They possibly could, sure.

5 Q. Do you think it would make sense for a library
6 to have both anti-cop and pro-cop books?

7 A. Yes, I think that would be good as long as,
8 again, the content is appropriate.

9 Q. And what is --

10 A. I don't -- I don't remember much about this
11 book.

12 Q. What is your recollection about why, according
13 to you, the content is inappropriate for middle school?

14 A. Because the way that it viewed cops. It was
15 like cops were bad, cops are evil, cops are not your
16 friends. I mean --

17 Q. And you took that as the message of the book,
18 correct?

19 A. Oh, that was a big message.

20 Q. And you disagree with that message?

21 A. I think that we're wise to teach young people
22 to respect those in authority.

23 MR. SAFIER: Okay. I'd like to mark this as
24 Exhibit 49.

25 (Baggett Exhibit 49 was marked for identification.)

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1 BY MR. SAFIER:

2 Q. This is a challenge form you filled out for the
3 book "Beloved," correct?

4 A. Yes.

5 Q. It says here the book depicts bestiality. Do
6 you have any recollection about where you got that?

7 A. Is that the one where I -- think there is a
8 line in there where they are referencing f-ing cows, I
9 do believe, uh-huh.

10 Q. Okay. And under strengths of this educational
11 media, you wrote: None.

12 Correct?

13 A. Yep.

14 Q. Is that your view?

15 A. Yes, it is.

16 Q. And under purpose of this educational media,
17 you wrote: None.

18 Correct?

19 A. Yes.

20 Q. And under age group you would recommend for
21 this educational media, you wrote: None.

22 Correct?

23 A. Right.

24 Q. Is it your understanding that some people view
25 this book as having great literary merit?

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1 A. I don't know. I don't know what other people
2 think on that.

3 MR. SAFIER: I'd like to mark this as
4 Exhibit 50.

5 (Baggett Exhibit 50 was marked for identification.)

6 BY MR. SAFIER:

7 Q. This is the challenge form you filled out for
8 the book "This Would Make a Good Story Someday,"
9 correct?

10 A. Yes.

11 Q. And you wrote -- actually, what do you recall
12 about this book?

13 A. Let's see. I think this had -- I think it had
14 some -- it was found in elementary schools and it had
15 some LGBTQ characters, same sex marriages and so forth.

16 Q. And that made it inappropriate for an
17 elementary school?

18 A. Yes.

19 Q. You write under what prompted your concern or
20 what first prompted your concern: This book violates HB
21 1557 and is content and age inappropriate according to
22 parental rights laws and shame based on race.

23 Do you know what you mean -- what you meant
24 there by shame based on race?

25 A. I remember that there was some content about,

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1 again, stereotypes with race.

2 Q. Okay. But you don't remember anything more
3 than that right now?

4 A. No.

5 MR. SAFIER: Okay. I'd like to mark this as
6 Exhibit 51.

7 (Baggett Exhibit 51 was marked for identification.)

8 BY MR. SAFIER:

9 Q. This is a challenge form you filled out for the
10 book "The Kite Runner," correct?

11 A. Yes.

12 Q. And you write under reasons for objections:
13 Extremely graphic of child rape.

14 Correct?

15 A. Yes.

16 Q. Is -- to the extent that you recall, is it your
17 understanding that the depiction of child rape in this
18 book is meant to be titillating?

19 A. No, it was just horrific and graphic.

20 Q. And that, as unfortunate as it is, that's a
21 thing that does happen sometimes, correct, children are
22 raped?

23 A. Does that mean we need to put it in front of
24 them? I mean, perhaps, if they're going to read about
25 it, it should be with a professional maybe or something.

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1 Q. Okay.

2 A. It's just extremely graphic.

3 Q. Okay. So that was your objection to this book?

4 A. Yes.

5 Q. Okay. You wrote under "What do you believe is
6 the purpose of this educational media?" Indoctrination.

7 What is your basis for believing that to be the
8 purpose of this book?

9 A. I don't recall.

10 Q. Would the mere fact that it depicts homosexual
11 rape of a child mean that it was for the purposes of
12 indoctrination, in your view?

13 A. Not necessarily, no.

14 Q. Okay. So you just don't recall why you --

15 A. I don't recall.

16 Q. That's fine.

17 MR. SAFIER: I'd like to mark this as

18 Exhibit 52.

19 (Baggett Exhibit 52 was marked for identification.)

20 BY MR. SAFIER:

21 Q. Ms. Baggett, this is a challenge form you
22 filled out for the book "Race and Policing in Modern
23 America," correct?

24 A. Yes.

25 Q. Do you recall this book?

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1 A. Barely. Again, this is two years ago.

2 Q. Understood. Understood. To the extent that
3 you recall, is it your understanding that this is a
4 nonfiction book about rape and policing in modern
5 America?

6 A. Yes, I guess. I don't recall really but...

7 Q. Do you have any basis -- did you have any basis
8 when you filled out this form in August of 2022 for
9 thinking that the book was factually inaccurate?

10 A. I remember when I read this book, I remember
11 exactly what I put down for the objection.

12 Q. And what was that?

13 A. All police are not bad but the assumption in
14 the book is that all police are bad, and that all White
15 people are racist, or all Asian people are racist. I
16 think there was even a reference -- if I recall, there
17 was even a reference to -- I'm thinking Asian people,
18 like I said, as being racist as well. It's just --
19 again, it was just pushing that divisiveness.

20 Q. So your objection to this book, just to
21 summarize, was that, according to you, it pushes the
22 idea that all police are bad and that non-Blacks are
23 racist, correct?

24 A. Yes.

25 Q. And that's the message of the book, correct?

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1 A. Yes.

2 Q. And you think that's an inappropriate message
3 to be in a middle school library, correct?

4 A. I do.

5 Q. Okay. And you think the purpose of this book
6 is to race-bait, correct?

7 A. I didn't say that.

8 Q. No, you did.

9 A. Well, I mean, I think that -- I didn't just say
10 that. I said that here but I am assuming that -- I
11 would have to go back and reread it but possibly, yes.

12 Q. Sure. Okay.

13 A. I don't think we need to push divisiveness with
14 race.

15 MR. SAFIER: I'd like to mark this as
16 Exhibit 53.

17 (Baggett Exhibit 53 was marked for identification.)

18 BY MR. SAFIER:

19 Q. Ms. Baggett, this is a challenge form you
20 filled out for the book "Speak," correct?

21 A. Yes.

22 Q. Do you recall this book?

23 A. Yes.

24 Q. Tell me what you recall about it.

25 A. Rape.

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1 Q. Can you say more?

2 A. I just remember -- is this the one -- hold on.
3 I think that this is the one where she was raped in
4 college. Is that correct? And she -- it was graphic,
5 extremely graphic in nature. What was interesting about
6 this book, if I recall, I think they -- a man went to
7 prison for 16 years for this crime, if I recall, if I'm
8 not getting it mixed up with another book, but the man
9 ended up being exonerated.

10 Q. Oh, I do think you're confusing this with a
11 different book.

12 A. Am I?

13 Q. Yeah, I do think so.

14 A. Okay. I may be. I may be. Like I said, I
15 have five going at one time.

16 Q. Understood. Understood.

17 A. Sorry.

18 Q. So under 5, in response to the prompt "What do
19 you believe is the purpose of this educational media?"
20 you wrote: Anti-men, anti-rape.

21 Correct?

22 A. Yes.

23 Q. Let me ask you this question. Is it bad for a
24 book to be anti-rape?

25 A. No.

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1 Q. So what is your objection?

2 A. I don't know. I don't know why I put "anti"
3 there, because this -- this is a graphic -- what I
4 recall about this book, it was -- it had graphic rape
5 scenes, which is not good.

6 Q. Even in the context of a book that's anti-rape?

7 A. No, that's a good thing, anti-rape. I think I
8 miswrote on that.

9 Q. Okay. Okay. What about the other piece, the
10 anti-men, is that a good or bad thing?

11 A. That's a bad thing. That's a bad thing.

12 Q. Do you think it's appropriate -- well, let
13 me -- what do you -- do you think the message of this
14 book is anti-men and anti-rape?

15 A. I think the message is anti-men, and then --
16 yes.

17 Q. Do you think the book depicts men as rapists?

18 A. Yes.

19 Q. And you think that's an inappropriate message
20 for high school?

21 A. I think that, again, the context in which it
22 was relayed is inappropriate.

23 Q. And what is that context?

24 A. It was extremely graphic.

25 MR. SAFIER: I'd like to mark this as

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1 Exhibit 54.

2 (Baggett Exhibit 54 was marked for identification.)

3 (Discussion off the record.)

4 BY MR. SAFIER:

5 Q. So Exhibit 54 is a challenge form you filled
6 out for the book "Ramona Blue," correct?

7 A. Yes.

8 Q. Do you recall this book?

9 A. Barely, but yes.

10 Q. I just want to ask you a few questions.

11 Reasons for objections, you wrote: Sexual activities;
12 inexplicit sexual nudity.

13 And some other terms that we'll get to in a
14 second. Do you know what you meant by inexplicit sexual
15 nudity?

16 A. Allusions to the nudity, that's usually what
17 that references.

18 Q. And this is a book for high schools, right?

19 A. Yes.

20 Q. Do you think it's inappropriate for a high
21 school book to have inexplicit sexual nudity?

22 A. Coupled with everything else, yes.

23 Q. So when you wrote or in response to the prompt
24 "What do you believe is the purpose of this educational
25 media?" you wrote: Racial division and sexual deviance.

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1 Do you recall what your basis was for
2 characterizing the book that way?

3 A. I do not.

4 MR. SAFIER: Okay. I'd like to mark this as
5 Exhibit 55.

6 (Baggett Exhibit 55 was marked for identification.)

7 BY MR. SAFIER:

8 Q. Do you agree that Exhibit 55 is a challenge
9 form you filled out for a book called "Degratias: A
10 Tale of Rwanda"?

11 A. Yes.

12 Q. Do you recall this book?

13 A. Yes.

14 Q. This book is a -- provides a history of the
15 Rwandan civil war, correct?

16 A. Yes.

17 Q. What is your objection to the book?

18 A. These were graphic pictures. I remember
19 specifically they were pictures involving sex, awful
20 name calling all throughout, especially against women,
21 girls.

22 Q. The Rwandan civil war was a horrific event,
23 correct?

24 A. I understand that. Again, it was the context
25 in which this was being presented. These were pictures,

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1 and according to 847.012, we cannot have graphic
2 pictures that show this kind of thing.

3 Q. Even if they depict a historically accurate --
4 even if they depict a real event accurately?

5 A. If I recall, there were actual pictures of
6 people having sex and nudity.

7 Q. One of the things you wrote in your objection
8 to this book is that it's race-baiting. Can you explain
9 that to me?

10 A. If I recall about this book, there were
11 horrible name callings, and that was, again, why?

12 Q. Do you think it's race-baiting to call
13 attention to the tragedy of Rwanda?

14 A. No.

15 Q. So this had to do with the specific content?

16 A. Right.

17 Q. Okay.

18 MR. SAFIER: I'd like to mark this as
19 Exhibit 56.

20 (Baggett Exhibit 56 was marked for identification.)

21 BY MR. SAFIER:

22 Q. Exhibit 56 is a challenge form you filled out
23 for the book "That's Betty: The Story of Betty White,"
24 correct?

25 A. Yes.

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1 Q. Who is Betty White?

2 A. Comedienne, off of "The Golden Girls."

3 Q. What could you possibly object to about this
4 book?

5 A. Based on 1557, this book had -- if I recall, it
6 was found in an elementary school and it had references
7 to "my two dads" and, again, that was, you know, going
8 off the interpretation of 1557.

9 Q. And your view is that's enough to get it out of
10 bounds for K through 3, correct?

11 A. Based on my understanding of 1557, yes.

12 Q. Is it your personal belief that this book would
13 be inappropriate for fourth and fifth graders?

14 A. With parental consent. As long as parents know
15 what's in that MARC report, then they could opt in.

16 Q. What about sixth through eighth?

17 A. No, that's fine. They're older.

18 Q. Okay. I'd like to mark this as Exhibit 57.

19 (Baggett Exhibit 57 was marked for identification.)

20 BY MR. SAFIER:

21 Q. This is a challenge form you filled out for the
22 book called "Stella Brings the Family," correct?

23 A. Yes.

24 Q. I think we looked at this before, but you write
25 under reasons for objections: Author claims book is

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1 written for gay parents and their children.

2 Correct, you wrote that?

3 A. Yes, that's my handwriting.

4 Q. Why is that a reason for a book to be taken out
5 of schools?

6 A. I don't remember. I don't know if that was
7 under the "About the author" section or not. That
8 may have -- it could have even been on the title page.
9 I don't know.

10 Q. Do you think the fact that the book is written
11 for gay parents and children means that its purpose is
12 to promote the sexual deviance agenda?

13 A. No. I think you have to look at the content of
14 what's in the book.

15 Q. So -- but your view is this book does in fact
16 promote the sexual deviance agenda?

17 A. This book has two dads and, like -- or two
18 moms, something like that, and it's, again, according to
19 1557, K through 3, we're not supposed to push sexual
20 ideas.

21 Q. And putting aside the statute, is it your view
22 that any book that depicts two dads promotes a sexual
23 deviance agenda?

24 A. I think any book in K through 3 that promotes
25 two dads or two moms would be a violation, and I'm in

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1 agreement with that. It's -- I think that that's too
2 heavy for minor children.

3 Q. My -- I think we're at the same page but I just
4 want to clarify. Just unpack this. Is it your view
5 that any book that includes two dads or two moms
6 promotes the sexual deviance agenda?

7 A. No. It depends on the grade level.

8 Q. So putting -- all right. So putting any book
9 that includes two dads or two moms in a K through 3
10 library is a way of promoting the sexual deviance
11 agenda, in your view?

12 A. Yes. It's a way of promoting sexual
13 ideologies, yes.

14 Q. What do you think the message of "Stella Brings
15 the Family" is?

16 A. My comment was to promote sexual deviance.

17 Q. And you disagree with that message?

18 A. Yes, for K through 3. Parents -- again,
19 parents need to know before they allow their children...

20 Q. Exhibit 58 is a challenge form you filled out
21 for the book "Bear Town," correct?

22 MR. SAFIER: Oh, sorry. My bad. I've stopped
23 looking up.

24 (Baggett Exhibit 58 was marked for identification.)

25 BY MR. SAFIER;

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1 Q. Let's try that again. Exhibit 58 is a
2 challenge form you filled out for the book "Bear Town,"
3 correct?

4 A. Yes.

5 Q. Do you recall this book?

6 A. I think this is about the -- I'm -- I kind of
7 think I do. No, not enough to talk about it, I don't.

8 Q. One of your reasons for objections you identify
9 is abortion. Correct?

10 A. Yes.

11 Q. Is it your recollection that this book depicts
12 a character having an abortion?

13 A. Yes.

14 Q. Do you think --

15 A. I think -- I think it does, yes.

16 Q. Do you think that fact makes it inappropriate
17 for high school?

18 A. No.

19 Q. So there could in theory be a book that
20 depicted a character getting an abortion that was
21 appropriate for a high school library?

22 A. Sure.

23 MR. SAFIER: Okay. Can I have -- I'm almost
24 done. Can I take five minutes to look at some
25 notes?

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1 MS. SMITH: Sure. And I'm just going to have a
2 few follow-up questions, too.

3 THE VIDEOGRAPHER: Stand by. Going off the
4 record. The time is 1:15 p.m.

5 (Recess from 1:15 p.m. until 1:18 p.m.)

6 THE VIDEOGRAPHER: We are now on the record and
7 the time is now 1:18 p.m.

8 MR. SAFIER: I'd like to mark this as
9 Exhibit 59.

10 (Baggett Exhibit 59 was marked for identification.)

11 THE WITNESS: I hate this picture.

12 BY MR. SAFIER:

13 Q. Ms. Baggett, have you seen Exhibit 59 before?

14 A. Twice, I've looked at this twice.

15 Q. This is an article written about you by a
16 journalist named Judd Legum, correct?

17 A. Yes.

18 Q. Did he interview you in connection with this
19 article?

20 A. Yes.

21 Q. Were you misquoted by him in this article?

22 A. Oh, yes.

23 Q. Do you know -- take as much time as you want
24 but can you -- can you tell me where you were misquoted?

25 A. Let's see. He uses selective phrasing all

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1 throughout. Let's see.

2 Where he's quoting me -- he quoted me on
3 Page 3, which was okay.

4 Q. So Page 3, let's -- can you tell me what the
5 quote is?

6 A. "She insisted it would make White students feel
7 uncomfortable because they are being White shamed. She
8 said the book was inappropriate because not all Whites
9 treated Blacks like this, and not all Blacks do drug
10 crimes, like a lot of people say."

11 Q. So those were statements you gave to --

12 A. That's what he said.

13 Q. Sorry. Let me finish.

14 A. Yes.

15 Q. Those are statements you gave to Mr. Legum in
16 connection with the book --

17 A. Yes.

18 Q. -- "When Wilma Rudolph Played Basketball,"
19 correct?

20 A. Yes, that's what --

21 Q. And those accurately quote you?

22 A. Do what?

23 Q. Do they acc -- are those quotes accurate? Is
24 that what you said to him, or no?

25 A. He says they are.

Deposition of Victoria G. Baggett

1 Q. But I'm asking --

2 A. Yes, yes, I guess they are.

3 Q. Okay.

4 A. Let me continue. He's not a -- I mean, he's a
5 blogger, by the way.

6 Oh, yeah. Notice he didn't use a quote, a
7 direct quote: Baggett added that she was a member of
8 the Daughters of Confederacy.

9 Q. Is that true?

10 A. No. I'm a daughter of Confederates.

11 Q. What is daughter of Confederates?

12 A. I had Confederate soldiers in my upline.

13 Q. Oh. So it's not -- that's not an organization?

14 A. Right. Right.

15 Q. This is something true about your genealogy?

16 A. Exactly.

17 Q. Gotcha.

18 A. I research my genealogy all day long. I love
19 that. I'm not a Daughter of the Confederacy. I could
20 be but I'm not, but how -- but, again, he twisted that.

21 Let's see. I don't -- any other quotes that
22 you want to talk about?

23 Q. Well, no. You represented that you were
24 misquoted and so I asked you to find where you were
25 misquoted.

Deposition of Victoria G. Baggett

1 A. Well, that, that's definitely one.

2 Q. So definitely he miss -- he represented that
3 you were a member of the Daughters of Confederacy and
4 you're not?

5 A. Right. Right.

6 Q. So that's inaccurate. Are there quotes here
7 that are inaccurate?

8 A. The rest are okay.

9 Q. Okay. Did you post an image of a Confederate
10 flag on your Facebook?

11 A. Oh, yes, I did, also a Scottish flag, an
12 American flag, and an English flag. Again...

13 Q. Have you ever expressed opposition to
14 interracial marriage in your classroom?

15 A. Not that I'm aware.

16 Q. So that contention in this article is false?

17 A. Where was that stated?

18 Q. It wasn't a quote but the article says that you
19 expressed --

20 A. Yeah, I don't recall stating that, but...

21 Q. Do you oppose interracial marriage?

22 A. No.

23 Q. Have you ever expressed hostility to race
24 mixing in your classroom?

25 A. To race what?

Deposition of Victoria G. Baggett

1 Q. Race mixing.

2 A. No.

3 Q. Okay. So that -- to the extent the article
4 says that, that's false?

5 A. Yeah, that's -- no. I've been teaching 34
6 years and that's never been an issue. We don't talk
7 about that.

8 MR. SAFIER: I have nothing further at this
9 time.

10 CROSS-EXAMINATION

11 BY MS. SMITH:

12 Q. Okay. Good afternoon, Ms. Baggett.

13 A. Hi.

14 Q. Again, we met off the record. I'm Nicole
15 Smith. I represent the school board, so I will just
16 have a few follow-up questions for you today.

17 A. Okay.

18 Q. Same rules apply. Even though it feels like a
19 conversation, so we don't drive our court reporter
20 mad --

21 A. Okay.

22 Q. -- do your best, and you've been doing great,
23 to let me finish my question.

24 Okay. So let me start at the beginning. When
25 Plaintiffs' counsel was asking you questions about

Deposition of Victoria G. Baggett

1 various websites that you may have referred to to get
2 information about books, did I hear you say one of the
3 websites was Books-A-Million?

4 A. It was not a website. It was a location,
5 Books-A-Million. You know, I go in Books-A-Million all
6 the time and find books.

7 Q. Oh, okay.

8 A. Yeah.

9 Q. So you go, in addition to going to libraries --

10 A. Yes.

11 Q. -- you also go into retail bookstores?

12 A. Bookstores, yes.

13 Q. Understood.

14 A. I have a problem with books.

15 Q. You love books?

16 A. I love books.

17 Q. Too much? How many hours a day would you say
18 you spend reading?

19 A. During -- well, I mean, I'm always found with a
20 book in my hand or a podcast or something like that.
21 When I teach, during my lunchtime I'm reading, you know.
22 I -- it's just I love books. I mean, that's what I do.

23 Q. All right. Plaintiffs' counsel asked you
24 several questions about you advocating for changes to --
25 we call it the policy, so I just want to make sure for

Deposition of Victoria G. Baggett

1 the record, are we talking about Board Policy 4.06?

2 A. Yes.

3 Q. And that is the policy that pertains both to
4 instructional materials and school library materials,
5 correct?

6 A. That's correct. Correct.

7 Q. Is it your understanding, Ms. Baggett, that
8 that policy has changed several times over the past few
9 years?

10 A. That is my understanding.

11 Q. Okay. And is it your understanding that Board
12 Policy 4.06 was amended on occasions when state law
13 changed?

14 A. Yes, that is my understanding.

15 Q. So it's your understanding that the school
16 board was required, at times that the state law changed,
17 to make sure that their board policy complied, correct?

18 A. That's correct.

19 MR. SAFIER: Objection to form.

20 A. What I was told is that no one had submitted
21 forms before, so it was -- it was a new process for
22 everybody, and so, you know, they had -- they could see
23 that there were some tweaks in the policy even when this
24 all started, so yes.

25 Q. Was there a period of time where the policy

Deposition of Victoria G. Baggett

1 was -- or let me ask it a different way.

2 Was there a period of time where the practice
3 of the district changed so that all books that were
4 challenged were restricted pending review?

5 A. Yes.

6 Q. Okay. And do you know how long that practice
7 was in effect?

8 A. I do not know how long that was in effect.

9 Q. Do you know if that ever was formalized into a
10 board policy?

11 A. I do not.

12 Q. Okay. You -- do you know whether at board
13 meetings, did you ever observe members of the community
14 coming out to advocate their positions on what they
15 thought the Board Policy 4.06 should reflect?

16 A. Oh, absolutely. I mean, there were -- there
17 were people on both sides of the aisle.

18 Q. Okay.

19 A. Wanting books to stay on the shelves while they
20 were being reviewed, wanting books to -- especially
21 these that were, you know, obscene, pornographic in
22 nature, to be removed while they were being reviewed.

23 Q. So fair to say you were one of many voices that
24 were speaking up on that issue?

25 A. Yes. I just think maybe my voice was the

Deposition of Victoria G. Baggett

1 loudest at the time, you know, because it was just there
2 and it was -- once I started looking at one book, it led
3 to many more.

4 Q. I thought I heard you say this has become your
5 mission or your -- did I hear that part right?

6 A. Yes. I mean, I'm -- it's -- it is a -- I just
7 don't think people understand how serious this is. It's
8 all in our libraries, you know. It's -- when you can
9 pick up a child's elementary book and an advertisement
10 for a link is right there and you as the parent are
11 concerned -- in my case, my children are grown, so I'm a
12 great aunt -- I click on the link to check the link and
13 it leads you to pictures of women masturbating, there is
14 a problem and something needs to be done. This is very
15 serious, and so yes, it is a mission.

16 Q. Do you view this as your personal mission?

17 A. I certainly do.

18 Q. Are the views expressed in all of your
19 challenge forms that you submitted your own personal
20 views?

21 A. Yes, they are my personal views, yes.

22 Q. Has anybody, any official, any leader in
23 administration at the Escambia County School Board, ever
24 asked you to put information in one of these challenge
25 forms?

Deposition of Victoria G. Baggett

1 A. Absolutely not.

2 Q. Have any of the board members communicated with
3 you regarding one of your specific challenge forms to
4 say, "Yes, I 100 percent agree with every single word
5 you put, Ms. Baggett"?

6 A. No. No. I've had, you know, I've had people
7 to come up to me after a board meeting and say "thank
8 you, keep up this work, we had no idea," but not board
9 members. They've always been very professional.

10 Q. You -- I understand you're an employee, you're
11 a teacher of the school district, but all of your work
12 with regards to your efforts to challenge and restrict
13 and remove certain books, that has all been done in your
14 personal capacity, correct?

15 A. Yes.

16 Q. You have never been paid by the Escambia County
17 School Board for any of that work, correct?

18 A. No. Goodness. I would be a wealthy woman.
19 No.

20 Q. Has anybody ever told you, "Ms. Baggett, you
21 need to do this on your own time, not at work"?

22 A. Oh, I had sent -- as I said, I have nothing to
23 hide and I know, you know, one time I had sent an e-mail
24 like -- about this during lunch or something like that,
25 and I was told please don't do this during the school

Deposition of Victoria G. Baggett

1 day, and so I don't, you know.

2 Q. Okay.

3 A. So that was just an -- I didn't think about it,
4 you know, because I saw this as -- I saw this as
5 definitely something pertaining to school kids, so, to
6 me, it was something that I didn't need to wait on,
7 but...

8 Q. All right. I think you said during your
9 testimony at some point "after a clearer decision of
10 House Bill 1557 came out." Did I hear you correctly?

11 A. Yes.

12 Q. What did you mean by that?

13 A. Where recently -- and I may have my terminology
14 incorrect, but recently there was a clearer
15 understanding of what was meant by that in that, oh,
16 this does not per se pertain to library books, that is
17 going to be left up to the school districts. That's
18 what I meant by that.

19 Q. Okay.

20 A. DeSantis's edict about that.

21 Q. All right. So your understanding is the State
22 of Florida has taken the position that House Bill 1557
23 does not apply to school library books?

24 A. Right, right. Now. Whereas before we thought
25 that, you know -- I say "we." Collectively, people who

Deposition of Victoria G. Baggett

1 submitted books, we thought that it did and should, you
2 know.

3 Q. Do you have -- well, let me ask it a different
4 way.

5 To your knowledge, the board did not formally
6 adopt any policy that stated House Bill 1557 applies to
7 library books, correct?

8 A. No, where, actually, many people of the public
9 have been going to the board meetings and pushing for
10 our board to please come up -- allow committees to come
11 together and come up with community standards so that we
12 can have a position and there won't be any questions
13 about things, you won't have this.

14 As a matter of fact, you can stop it when you
15 order the books. That way you will know what type of
16 books you should order and that way we won't have
17 certain situations. Are we not going to have books
18 about, you know, certain things in K through 3, or are
19 we going to allow these based on our community
20 standards, but also respect those parents who do not
21 think that this is something to do and maybe by
22 allowing -- we've even requested this: Allow people who
23 have read the books to leave reviews on the MARC reports
24 so that parents can know, oh, this book contains, you
25 know, two fathers laying in a bed together, there are

Deposition of Victoria G. Baggett

1 actual pictures. So that way, if your child is
2 kindergarten and you do not think your child is mature
3 enough to handle that knowledge, then you as a parent
4 can make the decision I do not want my child to read
5 these sorts of books at this time.

6 Q. And just so I understand, the collective "we"
7 that you use there, those would be --

8 A. All people that I know of who are -- who are
9 trying so hard to expose what's going on in our public
10 school libraries.

11 Q. But at this point in time, the board has not
12 adopted --

13 A. They have not.

14 Q. -- that suggestion, correct?

15 A. Right, they have not.

16 Q. Okay. And at this point in time your
17 understanding is that the board does not consider House
18 Bill 7 to apply to library books either, correct?

19 A. That's my understanding, because they've put --
20 they've put them back on the shelf.

21 Q. Okay.

22 A. Shelves.

23 Q. And that's what I was going to ask you as well.
24 So in addition to Board Policy 4.06 changing over time,
25 has that impacted, in your view, which books have been

Deposition of Victoria G. Baggett

1 restricted and then them becoming unrestricted?

2 A. As far as I can see, the only books at this
3 time that are restricted are those that were submitted
4 based on 847.

5 Q. Okay. Florida Statute 847?

6 A. Yes. Yes. The ones that were submitted based
7 on the previous 1557, as far as I can see, they have now
8 been put back on the shelves.

9 Q. Okay. And do you disagree with that?

10 A. For K through 3, I do.

11 Q. Okay.

12 A. I just don't think a child is mature enough to
13 handle those sorts of things, without parental
14 knowledge.

15 Q. Okay.

16 A. And you cannot know what's in a library book
17 until you read it.

18 Q. Is it your understanding, Ms. Baggett, that in
19 the Escambia County school libraries there are books
20 that are on the shelves that had not been reviewed by a
21 Certified Media Specialist?

22 A. 100 percent, yes.

23 Q. Why do you believe that?

24 A. Because I can find them every day. If our
25 school district would say, "Hey, Ms. Baggett, would you

Deposition of Victoria G. Baggett

1 like to work for us finding books that violate our laws
2 but you're not going to get paid unless you find, you
3 know, five books a week," I could turn around and find
4 10 books a week. We have that many. For every one that
5 you find that is age- and content-inappropriate, there
6 are 10 more coming in.

7 Q. Is it your understanding that the book -- I'm
8 sorry, the district is going through the process of
9 trying to review books that are presently --

10 A. Yes.

11 Q. -- on library shelves?

12 A. Yes.

13 MS. REGAN: Let her finish.

14 THE WITNESS: I'm sorry. I'm sorry.

15 A. Yes, they are trying as -- it's my
16 understanding they're trying as hard as they can, and I
17 commend them for that.

18 Q. Okay.

19 A. It's a mammoth task, I'm sure.

20 Q. I was going to say why do you say that?

21 A. I don't know the number of books that we have,
22 I just know how long it takes me to do the few that I
23 do, you know. It's a big deal to do this.

24 Q. Now, you made a few statements during your
25 testimony about your assumptions for why the board voted

Deposition of Victoria G. Baggett

1 to either remove or restrict a certain title, and I just
2 wanted to clarify that you don't have personal knowledge
3 as to why any board member voted a certain way on any
4 given title, correct?

5 A. I absolutely have no knowledge as to why they
6 voted a particular way.

7 Q. And with regard to the book "And Tango Makes
8 Three," would you agree with me that the public board
9 meeting, either the video or the transcript thereof,
10 would be the most accurate way to know what each board
11 member said about why they were voting the way that they
12 did?

13 MR. SAFIER: Objection to form.

14 A. Yes. I mean, how would I know what somebody is
15 thinking, but yes, that's the only way that -- that's a
16 good way to know what they -- the reason that they voted
17 the way that they did.

18 Q. Okay. So when you said something today about
19 you believe that the board removed "Tango" because it
20 was pushing, you know -- that they agreed with you that
21 it was pushing certain ideas to minor children, that was
22 just your assumption, correct?

23 A. Oh, yes, based on what they said at the board
24 meeting, because they, you know, they said -- I remember
25 at a particular board meeting, which was videoed and so

Deposition of Victoria G. Baggett

1 forth, so it's definitely public -- out there for the
2 public, I just remember that they said we have to follow
3 the law.

4 Q. Okay. You have not gone back and recently
5 reviewed that board meeting of "Tango," correct?

6 A. I have not. I don't --

7 Q. So that's just going on your best memory?

8 A. I'm just -- right, and I'm -- maybe I should
9 have gone back to review, but I was reviewing -- trying
10 to review all this stuff and I still missed some stuff.

11 Q. Plaintiffs' counsel asked you a lot of
12 questions about what you -- whether you would advocate
13 for certain laws in terms of, you know, certain subject
14 matter being allowed in books and school libraries based
15 on grades. Do you remember that line of questioning?

16 A. Yes.

17 Q. I just want to confirm that was all your own
18 personal opinions, correct?

19 A. Yes. Yes.

20 Q. Nobody from the Escambia County School Board
21 has told you that they endorse those views, correct?

22 A. Correct.

23 Q. And you are not a lawyer, correct?

24 A. I am not a lawyer.

25 Q. You have had no legal training, correct?

Deposition of Victoria G. Baggett

1 A. None.

2 Q. Okay. So, for example, I think at one point in
3 time you made the statement about "Drama" that it
4 violated House Bill 7. That was just your personal
5 opinion, correct?

6 A. Right.

7 Q. All right.

8 A. That goes back to my -- you have to remember I
9 have that English background, so I try to pull in
10 research content, you know, for my answers.

11 Q. Okay. Counsel asked you a few questions about
12 Toni Morrison's book, "The Bluest Eye." Do you remember
13 those questions?

14 A. Yes.

15 Q. And I don't think he asked you but do you
16 remember the vote on "The Bluest Eye," what the board
17 did with regard to that title?

18 A. I do not remember.

19 Q. If I represented to you that they restricted it
20 to only eleventh and twelfth grade students --

21 A. That's right. That's exactly right.

22 Q. So my question, though, is do you disagree with
23 the board's decision with regard to "The Bluest Eye"?

24 A. I respect their decision, so -- I mean, no, I'm
25 in agreement with it. I -- that vote, you know, was not

Deposition of Victoria G. Baggett

1 my favorite vote but I'm okay with it, you know.
2 There's a big difference in ninth and tenth graders and
3 eleventh and twelfth graders, we all know that, so I'm
4 okay with it. That gives a kid two more years to
5 mentally mature.

6 Q. Okay. Do you remember the title "The Nowhere
7 Girls"?

8 A. Yes.

9 Q. Do you remember how the board voted on that
10 book?

11 A. Wasn't that middle school, I think? I don't
12 remember how they voted. How did they vote?

13 Q. Do you remember what "Nowhere Girls" is about?

14 A. Isn't that the one where the attacks happened
15 on the group of girls and they're going to get back,
16 they got back at the boys, I believe.

17 Q. You've had an incredible memory so far today,
18 so...

19 A. I may have just messed up. I don't know.

20 Q. No, no.

21 A. I got two books mixed up a while ago.

22 Q. It's been shockingly good, so...

23 A. I will tell you the book -- I remember bringing
24 up the book "Push." That book, nothing has affected me
25 like that book did. That book was -- hmm. But anyway,

Deposition of Victoria G. Baggett

1 I may -- I hope that I'm remembering "The Nowhere Girls"
2 correctly, but what was the vote?

3 Q. So my question is -- so you don't remember the
4 vote on that one?

5 A. I don't remember the vote.

6 Q. Okay. So if I represent to you that the board
7 voted to restrict it to eleventh and twelfth grade,
8 based on your recollection of that particular title,
9 would you agree -- do you agree with that vote?

10 A. Yeah. Yeah. Again, that gives a kid two more
11 years to mentally mature.

12 Q. Okay. As to the book "New Kid," is it your
13 understanding that that was a title that was held only
14 in elementary school libraries?

15 A. Yes.

16 Q. Okay. And is it your understanding that that
17 book was therefore removed from elementary school
18 libraries?

19 A. Yes. Yes.

20 Q. And you agree with that vote?

21 A. I do.

22 Q. As to the title "Drama," is it your
23 understanding that that book was only held in elementary
24 libraries as well?

25 A. That's correct.

Deposition of Victoria G. Baggett

1 Q. And so you agree with the vote to remove it
2 from elementary school libraries?

3 A. Yes, I do.

4 Q. Now, "Perks of Being a Wallflower," I think we
5 started there hours ago this morning, is it your
6 understanding that the board voted to only restrict it
7 as a twelfth grade novel study?

8 A. Yes, that's correct.

9 Q. And do you agree with that vote?

10 A. I do. I was hoping that -- I mean, I was
11 hoping that the district downtown, the library media
12 director, would, you know, say, "Hmm, let's examine this
13 book for ourselves and see if we think it meets
14 communities standards," but we don't have any community
15 standards yet, so, you know -- so I think that's one of
16 those that might later, you know, somebody will look at,
17 but yes, I definitely agree with that decision.

18 Q. Okay. And is that why you didn't appeal it
19 further with regard to the book being --

20 A. Yes.

21 Q. -- in either middle schools or high schools?

22 A. Right. There are way worse books out there.

23 Q. And you started to talk about "Push" and how
24 that affected you. Can you describe for me what you
25 meant by that?

Deposition of Victoria G. Baggett

1 A. That's one of the most horrifying books I think
2 I've ever read, and it's -- that's the one where, you
3 know, the child is being molested and raped by her
4 father and she talks about having orgasms and -- I mean,
5 the book goes into descriptions of the sounds. That
6 book, it just -- that was a very, very graphic book, and
7 if it -- if it did that to me, an adult who reads
8 constantly, and all my degrees are in English, advanced
9 English, then what would that kind of book do to a
10 child?

11 MS. SMITH: Thank you, Ms. Baggett. That's all
12 the questions I have for you today.

13 THE WITNESS: You're welcome.

14 MR. SAFIER: Nothing further from me.

15 THE VIDEOGRAPHER: Before we go off the record,
16 Counsel, would anyone like a copy of the video?

17 MS. SMITH: No, thank you.

18 MR. SAFIER: Not now.

19 THE VIDEOGRAPHER: Not now. All right. This
20 concludes today's deposition and we are going off
21 the record at 1:46 p.m.

22 THEREUPON, the deposition of VICTORIA G.
23 BAGGETT, taken at the instance of the Plaintiffs, was
24 concluded at 1:46 p.m. CDT.

25

Deposition of Victoria G. Baggett

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CERTIFICATE OF REPORTER OATH

STATE OF FLORIDA

COUNTY OF ESCAMBIA

I, Susan D. Wasilewski, Registered Professional Reporter, Certified Realtime Reporter, Certified Manager of Reporting Services, Certified Realtime Captioner, Florida Professional Reporter, and Notary Public in and for the State of Florida at large, hereby certify that the witness named herein appeared before me on Thursday, July 25, 2024, and was duly sworn.

WITNESS my hand and official seal this 21st of August, 2024.

Susan Wasilewski

SUSAN D. WASILEWSKI, RPR, CRR, CMRS, CRC, FPR

NOTARY PUBLIC - STATE OF FLORIDA

MY COMMISSION NO. HH 438399

EXPIRES: 10-23-27

Deposition of Victoria G. Baggett

1 CERTIFICATE OF REPORTER

2 STATE OF FLORIDA

3 COUNTY OF ESCAMBIA

4 I, Susan D. Wasilewski, Registered Professional
5 Reporter, Certified Realtime Reporter, Certified Manager
6 of Reporting Services, Certified Realtime Captioner, and
7 Florida Professional Reporter, do hereby certify that I
8 was authorized to and did stenographically report the
9 examination of the witness named herein; that a review
10 of the transcript was requested; and that the foregoing
11 transcript is a true record of my stenographic notes.

12 I FURTHER CERTIFY that I am not related to or
13 an employee of any of the parties, nor am I related to
14 or an employee of any of the parties' attorneys or
15 counsel connected with this action, nor am I financially
16 interested in the outcome of this action.

17 DATED THIS 21st of August, 2024.

18
19 20 SUSAN D. WASILEWSKI, RPR, CRR, CMRS, CRC, FPR

Deposition of Victoria G. Baggett

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IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF FLORIDA
PENSACOLA DIVISION

Case No. 3:23-CV-10385-TKS-ZCB

PEN AMERICAN CENTER, INC.,
et al.,

Plaintiffs,

vs.

ESCAMBIA COUNTY SCHOOL BOARD,

Defendant.

IN RE: Deposition of Victoria G. Baggett
Taken Thursday, July 25, 2024

TO: SHARON DELENE REGAN, ESQUIRE
sharonregan@hotmail.com

Dear Ms. Regan:

The referenced transcript has been completed and awaits review and signing of the errata sheet.

Thank you for agreeing to handle the reading and signing process. Today's date is August 21, 2024. Please complete the reading and signing by September 30, 2024.

The original transcript of this deposition has been delivered to Attorney Paul J. Safier, and the errata sheet, once completed, should be forwarded to Attorney Paul Safier and Attorney Nicole Smith at safierp@ballardspahr.com and nsmith@rumberger.com.

Thank you.

Susan Wasilewski

Susan Wasilewski, RPR, CRR, CMRS, CRC, FPR
Anchor Court Reporting

Deposition of Victoria G. Baggett

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ERRATA SHEET

DO NOT WRITE ON TRANSCRIPT - ENTER CHANGES ON THIS PAGE

IN RE: Pen American Center, Inc., et al., vs.
Escambia County School Board
CASE NO.: 3:23-CV-10385-TKS-ZCB

Deposition of Victoria G. Baggett
Taken Thursday, July 25, 2024

PAGE #/LINE #	CHANGE	REASON
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Under penalties of perjury, I declare that I have read
the foregoing document and that the facts stated in it
are true.

VICTORIA G. BAGGETT

DATE

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