

In the Matter Of:

BOSTOCK V. CLAYTON COUNTY

1:16-CV-01460-ELR-WEJ

GERALD BOSTOCK

October 14, 2021



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GERALD BOSTOCK
BOSTOCK V. CLAYTON COUNTY

October 14, 2021

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IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

GERALD LYNN BOSTOCK,)	
)	
PLAINTIFF,)	
)	
vs.)	
)	CASE NUMBER:
)	1:16-CV-01460-ELR-WEJ
CLAYTON COUNTY,)	
)	
DEFENDANT.)	
)	

The following videotaped deposition of Gerald Bostock was taken pursuant to stipulations contained herein, the reading and signing of the deposition reserved, before Stephen Mahoney, Certified Court Reporter, 4921-4880-0199-0656, in the State of Georgia, at 600 Peachtree Street, N.E., Suite 3900, Atlanta, Georgia 30308 on October 14, 2021 at 10:06 a.m.

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ON BEHALF OF THE PLAINTIFF:

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ALSO PRESENT:
ERIC LUCAS, VIDEOGRAPHER

TRANSCRIPT LEGEND

-- Cross-talk/interruption/change of thought
(ph) Phonetically spelled
[sic] Written as spoken
(unintelligible) Not capable of being understood

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INDEX TO PROCEEDINGS

EXAMINATION OF GERALD BOSTOCK	PAGE
CROSS BY MR. HILL.....	08
DIRECT BY MR. MEW.....	308
DISCLOSURE.....	311
CERTIFICATE OF REPORTER.....	312
ERRATA SHEET.....	313

INDEX TO EXHIBITS

IDENTIFIED	PAGE
EXHIBIT NO. 01 - FCCC, INC. ARTICLES OF INCORPORATION.....	92
EXHIBIT NO. 02 - FCCC, INC. BY-LAWS.....	104
EXHIBIT NO. 03 - INVES. SUMMARY, CLAYTON_013912-16.....	109
EXHIBIT NO. 04 - MEMO OF UNDERSTANDING, CLAYTON_000232-39..	115
EXHIBIT NO. 05 - 2011 HERITAGE BANK STATEMENTS.....	146
EXHIBIT NO. 06 - 2012 HERITAGE BANK STATEMENTS.....	167
EXHIBIT NO. 07 - 2013 HERITAGE BANK STATEMENTS.....	193
EXHIBIT NO. 08 - 2011-2013 HERITAGE BANK STATEMENTS.....	195
EXHIBIT NO. 09 - MAY 24, 2013 INTERROGATORIES.....	197
EXHIBIT NO. 10 - MAY 28, 2012 INTER-OFFICE MEMO.....	203
EXHIBIT NO. 11 - FLASH DRIVE WITH VIDEO FILE.....	217
EXHIBIT NO. 12 - JULY 13, 2010 INTER-OFFICE MEMO.....	238
EXHIBIT NO. 13 - NOVEMBER 11, 2010 INTER-OFFICE MEMO.....	244
EXHIBIT NO. 14 - 2009 AND 2011 PERFORMANCE EVALUATIONS....	252
EXHIBIT NO. 15 - MAY 17, 2012 GENERAL COUNSELING FORM.....	254
EXHIBIT NO. 16 - GDOL CLAIMANT'S INFORMATION.....	265
EXHIBIT NO. 17 - FACT FINDING INQUIRY, CLAYTON_000367.....	272
EXHIBIT NO. 18 - FEBRUARY 17, 2015 LETTER.....	275
EXHIBIT NO. 19 - JANUARY 14, 2013 E-MAIL.....	278
EXHIBIT NO. 20 - JANUARY 17, 2013 E-MAIL CHAIN.....	278

P R O C E E D I N G S

1
2 THE VIDEOGRAPHER: Today's date is
3 October 14th, 2021, and the time is 10:06 a.m.
4 This will be the videotape deposition of Gerald
5 Bostock in the matter of Gerald Lynn Bostock
6 vs. Clayton County. Clayton at 600 Peachtree
7 Street, Atlanta, Georgia.

8 Would Counsel present please identify
9 themselves for the record?

10 MR. HILL: Michael Hill for the Defendant.

11 MR. BUECHNER: William Buechner for the
12 Defendant.

13 MR. MEW: Tom Mew on behalf of the
14 Plaintiff, Mr. Bostock.

15 MR. BUCKLEY: Ed Buckley on behalf of
16 Mr. Bostock.

17 THE VIDEOGRAPHER: Would the Court
18 Reporter please swear in the witness? Thank
19 you.

20 THE COURT REPORTER: Do you swear or
21 affirm that the testimony you're about to give
22 will be the truth, the whole truth, and nothing
23 but the truth?

24 THE WITNESS: I do.

25 MR. HILL: Okay.

GERALD BOSTOCK
BOSTOCK V. CLAYTON COUNTY

October 14, 2021

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1 This -- this is the deposition of Gerald
2 Bostock being taken in the case of Gerald Lynn
3 Bostock versus Clayton County, currently
4 pending in the United States District Court
5 Northern District of Georgia.

6 Case Number 116CV1460, which is being
7 taken in accordance with notice and agreement
8 of Counsel and for all purposes allowed under
9 the federal rules of civil procedure and
10 federal rules of evidence.

11 Good morning, Mr. Bostock.

12 THE WITNESS: Good morning.

13 MR. HILL: My name is Michael Hill, and I
14 represent Clayton County in this lawsuit you
15 filed. And before we get started, do we agree
16 to stipulate to reserve all objections except
17 as to the form of the question and
18 responsiveness of the answer?

19 MR. MEW: Yeah, other than, you know, if
20 there's some privilege issue or the like, yeah,
21 of course.

22 MR. HILL: Sure.

23 Mr. Bostock, have you ever had your
24 deposition taken before?

25 THE WITNESS: No.

1 MR. HILL: Okay.

2 So I know you've attended a bunch in this
3 case, so you've been through this ground rule
4 spiel a lot. But you understand that you're
5 here to answer questions under oath about this
6 case; correct?

7 THE WITNESS: I do.

8 MR. HILL: And I'm sure you know to be
9 sure to give verbal answers as opposed to
10 uh-huh or uh-uh or nuh-uh, you know --

11 THE WITNESS: Yes.

12 MR. HILL: -- or -- or shaking head or
13 nodding of the head, just so the court reporter
14 has a clear record of what we say today.

15 THE WITNESS: Yes.

16 MR. HILL: Okay.

17 And you agree that if I ask a question you
18 do not hear or understand, you'll ask me to
19 repeat it or rephrase it as appropriate?

20 THE WITNESS: Yes.

21 MR. HILL: And otherwise, I will assume
22 that you understood the question; is that fair?

23 THE WITNESS: Yes.

24 MR. HILL: Okay.

25 And you understand that the oath that you

1 just took prior to answering any questions
2 carries with it the same obligation to tell the
3 truth, the whole truth, and nothing but the
4 truth, just as the oath that you would take
5 before a jury if this case goes to trial?

6 THE WITNESS: I do.

7 MR. HILL: Okay.

8 Is there any reason why you would not be
9 able to give complete and accurate answers to
10 the questions I ask today?

11 THE WITNESS: No.

12 MR. HILL: So you're in -- you're not
13 taking any medication that might impair your
14 memory or ability to answer?

15 THE WITNESS: No.

16 MR. HILL: Okay.

17 And you knew that you'd be asked questions
18 about your allegations in this case; correct?

19 THE WITNESS: Yes.

20 MR. HILL: And so before coming here
21 today, did you think back on all the events
22 that took place so that you could have a clear
23 memory of exactly what occurred?

24 A. Yes.

25

CROSS-EXAMINATION

BY MR. HILL:

Q. Except for your attorneys, who have you talked with about your deposition today?

A. My partner is aware that I'm here.

Q. Do you -- did you discuss the -- the substance of your testimony at all?

A. No.

Q. Did you review any documents in preparing for your deposition?

A. I did.

Q. What did you review?

A. The productions that were sent --

(Background noise interruption.)

THE WITNESS: I'm sorry. Do you want me to repeat?

BY MR. HILL:

Q. Yes, please. Yeah.

A. The productions that were submitted by Clayton County.

Q. Okay. Did you review anything else?

A. No.

Q. Okay.

And you mean productions, like that -- documents that were produced in discovery.

1 A. Correct.

2 Q. Right?

3 Did you do anything else to prepare for
4 your deposition today?

5 A. I have met with my legal team.

6 Q. Okay.

7 Just so we have this on the record, you
8 identify as gay; correct?

9 A. That is correct.

10 Q. Okay.

11 And when you were working at Clayton
12 County, your sexual orientation was not a secret;
13 right?

14 A. I did not run down the hallway carrying a
15 rainbow flag, no. But I did not hide my sexuality,
16 no.

17 Q. Okay.

18 As far as you know, was Judge Teske aware
19 of your sexual orientation when you worked at
20 Clayton County?

21 A. At some point, he did become aware, yes.

22 Q. Okay. Do you know at what point?

23 A. I really don't. It was probably shortly
24 after I began.

25 Q. Okay. And you started in 2003?

1 A. That is correct, January of 2003.

2 Q. Okay.

3 And as far as you know, did Colin Slay --
4 was he aware of your sexual orientation when you
5 worked there?

6 A. At some point, I know he must've either
7 figured it out or saw, yes.

8 Q. Okay. Do you know at what point?

9 A. I don't.

10 Q. Okay. Why do you say that he must've
11 figured it out?

12 A. Well, my residence in Jonesboro was near
13 his residence in Jonesboro.

14 Q. Okay.

15 A. So there would be the occasion that he
16 would drive by and probably see who was at my home
17 or people coming and going, including my, at that
18 time, partner.

19 Q. Okay.

20 And John Johnson. Same question. As far as
21 you know, he was aware of your sexual orientation
22 when you worked at Clayton County?

23 A. Yes, and, again, at some point, I remember
24 when he approached me and indicated that a lot of
25 the female staff at the juvenile court were

1 interested in me. And he made a -- a snicker and
2 sort of replied before I could say anything, but
3 that doesn't really matter to you.

4 Q. When is -- when was this incident you're
5 referring to?

6 A. That was probably several months into my
7 employment with Clayton County.

8 Q. So you think it still might have been in
9 2003?

10 A. Most likely, yes.

11 Q. Okay.

12 And so what was the -- who were the female
13 employees he's talking about?

14 A. He did not give any names. All he said,
15 that there were quite a few or several females that
16 were interested in me.

17 Q. Okay. He said this to you directly?

18 A. Yes, in the hallway.

19 Q. In the hallway. Was anyone else there?

20 A. I don't know. I don't recall. I reported
21 it to another staff member immediately, though.

22 Q. Who did you report it to?

23 A. Jane Tuttle.

24 Q. And what was her position at the time?

25 A. She was the grants manager.

1 Q. Okay. Did you report it to anybody else?

2 A. No, I did not.

3 Q. What did you say to Jane Tuttle?

4 A. That I felt as though John Johnson was
5 homophobic and had just made a homophobic slur
6 towards me and my sexual orientation.

7 Q. And what -- what did -- what did he say to
8 you -- going back to John Johnson, what was the
9 remark he said to you?

10 A. He told me that a lot of -- something to
11 the -- let me -- let me start over.

12 Mr. Bostock, there are several -- or quite
13 a few females that are working here that have
14 expressed interest in you. And then there was a --
15 sort of a snicker smile. And then he responded
16 before I could say anything. He responded by saying,
17 but that doesn't really matter to you.

18 Q. Okay.

19 Did you think that he was trying -- that
20 he was, like, trying to be funny, or did you -- did
21 you think he was trying to make a joke or something?

22 A. I don't think he was kidding.

23 Q. Okay.

24 A. He had a quirky sense of humor, but I
25 didn't take it as funny.

1 Q. Okay. You didn't take it as a -- in a
2 friendly way?

3 A. Not at all.

4 Q. Okay.

5 Did Mr. Johnson ever say anything else to
6 you along these lines that you interpreted as less
7 than friendly regarding your sexual orientation?

8 A. The only other comment that I can recall
9 was while he was terminating me, and he referenced
10 my sexual orientation.

11 Q. And what did he say?

12 A. This is not because you're gay.

13 Q. Okay. Did he say anything else about your
14 sexual orientation?

15 A. No, but he's the one that brought it up.

16 Q. Okay. Do you remember what was said, like,
17 immediately before that comment?

18 A. I told him, and Colin Slay that I knew
19 what this was about.

20 Q. So you said, I know what this is about.
21 And he said it's not because you're gay?

22 A. This is not because you're gay.

23 Q. And then what did you say after that?

24 A. That's when the conversation pretty much
25 ended, as I recall. I was handed my letter and told

1 to evacuate from the property.

2 Q. Okay. So did you respond to the, this is
3 not because you're gay comment?

4 A. I did not.

5 Q. Did Colin Slay say anything at that --
6 during that meeting?

7 A. No, he did not. Not that I recall.

8 Q. Okay. Any other comments by John Johnson
9 regarding your sexual orientation?

10 A. Not that I can recall at this moment.

11 Q. Okay.

12 Did Colin Slay ever make any derogatory
13 comments or comments you interpreted as derogatory
14 regarding your sexual orientation?

15 A. Not that I can recall at this moment.

16 Q. What about Judge Teske?

17 A. Well, during testimony, I had the
18 opportunity to see his diary where he used the gay
19 word eight times. And in his explanation, the first
20 usage was to introduce me to his diary, but then he
21 proceeded through time to continue to reference my
22 sexuality as -- as being gay.

23 Q. Okay. But you weren't aware of those diary
24 entries when you worked at Clayton County; correct?

25 A. Correct.

1 Q. Okay. You saw them for the first time in
2 the course of this litigation?

3 A. Well, if I can back up.

4 Q. Sure.

5 A. I knew he kept diaries, but I had never
6 been privy to reading or seeing any of the verbiage
7 in those diaries. And I knew that he -- he -- he had
8 mentioned them before and mentioned that he kept
9 them in his office most of the time.

10 Q. You're not aware that anyone else ever saw
11 Judge Teske's diary entries; are you?

12 A. I -- I would not have any knowledge of
13 whether someone did or did not on that.

14 Q. Okay.

15 And the entries that you were referring to
16 where he uses the word gay, they're not derogatory
17 comments; are they?

18 MR. MEW: Object to form.

19 THE WITNESS: Again, as I've stated, the
20 -- the first entry was his explanation or
21 introduction, as he put it, as to who I was as
22 a new name appearing in his diaries. The fact
23 that the word gay is continued to be used seven
24 additional times, I do feel as that is
25 homophobic.

1 BY MR. HILL:

2 Q. This is something you are surmising on
3 your own; correct?

4 A. I would have to see the document again,
5 but I know how I felt, and I know when the word is
6 repeatedly used, I know how I feel about that.

7 Q. Okay.

8 No, that's just what I mean. It's based on
9 -- this is where -- where this information is coming
10 from that it's homophobic is coming from how you
11 feel --

12 MR. MEW: Object --

13 MR. HILL: -- about it; is that right?

14 MR. MEW: Sorry, Michael. Object to form.

15 THE WITNESS: Yes.

16 BY MR. HILL:

17 Q. Okay.

18 Other than those diary entries, are you
19 aware of Judge Teske making any other remarks,
20 comments about your sexual orientation?

21 A. Not that I can recall at this moment.

22 Q. Okay.

23 Are you aware of anyone else at the
24 juvenile court or with Clayton County Government
25 making any remarks about your sexual orientation?

1 A. It had been reported to me by a friend,
2 volunteer, and board member for -- that sat on
3 Friends of Clayton County CASA that Jeff Turner, the
4 Chairman of the Board of Commissioners, had made
5 some comments.

6 Q. Who told you that?

7 A. Sandra Henderson. She's the manager of
8 Savvi Formalwear in Morrow -- or was when I was
9 employed with Clayton County.

10 Q. When did she tell you this?

11 A. It was in or around a Christmas party, and
12 it was later in my career with Clayton County. So
13 I'm guessing maybe 2012 --

14 Q. Okay.

15 A. -- 2011.

16 Q. And what did she tell you that Mr. Turner
17 -- or Chairman Turner said?

18 A. I don't recall the exact words, but it was
19 -- her comments to me were that he had made some
20 comments about being uncomfortable around me because
21 of my sexuality.

22 Q. Okay. Did you say anything in response to
23 Ms. Henderson when she told you this?

24 A. I don't recall exactly what I said, but
25 probably something to the effect of, I was

1 surprised.

2 Q. Okay. Why were you surprised?

3 A. Because I worked with Jeff Turner on
4 several projects, specifically, you know,
5 surrounding my volunteer group, the ABCs, which
6 stands for Ambassadors Behind CASA, that work
7 directly with the children that we served, like
8 around Christmas time when we would have toy drives
9 and so forth.

10 Q. Okay.

11 And when you worked with him, you never
12 got the impression that he had any problem or issue
13 with your sexuality?

14 A. He was always very direct towards me but
15 not overly friendly.

16 Q. Okay.

17 But being -- you don't interpret someone
18 being direct towards you as having an issue with
19 your sexuality, though; do you?

20 A. Well, in response to your previous
21 question, that -- that's how I was trying to answer.

22 Q. Okay. I'm just not sure what the answer
23 is.

24 If the -- I was asking you if when you
25 worked with Chairman Turner if you ever got the

GERALD BOSTOCK
BOSTOCK V. CLAYTON COUNTY

October 14, 2021

19

1 impression that he had an issue with your sexuality,
2 and you said he was very direct with you. And so I
3 -- I don't know if that's a yes or a no.

4 A. I was surprised by the comment because we
5 had worked together.

6 Q. Okay.

7 You were surprised by the comment because
8 you did not have -- previously have the impression
9 that he had a problem with your sexuality?

10 A. Not that I could recall.

11 Q. Okay.

12 Like, he never said anything to you or did
13 anything that made you think he's doing this because
14 I'm gay? That never happened; right?

15 A. Not that I can recall.

16 Q. Okay.

17 Would it be fair to say that during the
18 time you worked for Clayton County, your sexuality
19 was commonly known throughout the juvenile court
20 staff?

21 MR. MEW: Object to form.

22 THE WITNESS: I would say that's probably
23 fair.

24 BY MR. HILL:

25 Q. Okay.

1 And over the years that you worked there,
2 from 2003 to 2013, coworkers at the juvenile court
3 had met your partners over those years at times; is
4 that right?

5 A. That is correct.

6 Q. Okay. One being Keith Sweat -- Keith Sweat
7 -- excuse me -- is that correct?

8 A. Correct.

9 Q. Okay.

10 And he had come to, I guess, like, staff
11 functions with you before; is that right?

12 A. The only attendance that I can recall is
13 he would attend some of our Duck Derby fundraising
14 events.

15 Q. Okay.

16 And when he would attend, you'd introduce
17 him as, this is my partner, or this is my boyfriend,
18 something like that; would you say that?

19 A. Yes.

20 Q. Okay. How many Duck Derby events do you
21 think he would have attended?

22 A. Not a lot. He typically attended -- I
23 think he may have attended the -- the actual Duck
24 Derby race maybe twice during my relationship with
25 him. And then there were a couple of other events.

1 Everything was duck-themed. We would have
2 a soup and quacker event, and it would be sort of
3 like a recognition for our sponsors. And he attended
4 probably one or two of those.

5 Q. Why is everything duck-themed?

6 A. Because it was -- the fundraiser itself
7 was the Darlin' Duck Derby.

8 Q. Mm-hmm.

9 A. And it was a race that -- we created a
10 racecourse, and we raced the little rubber ducks
11 that had numbers on them.

12 And initially, it had started as just a
13 single event, the race itself. And then, through
14 the years, I helped develop the Duck Derby into more
15 of a couple-of-month activity to help with
16 recruitment and retention of volunteers.

17 Q. So there were other activities, like,
18 leading up to the Duck Derby.

19 A. Correct.

20 Q. Is that what you mean? Okay.

21 But the Duck Derby race happened once a
22 year?

23 A. Yes, the last Saturday in September every
24 year.

25 Q. Okay.

1 You and Mr. Sweat have -- you socialized
2 with Judge Teske outside of work, as well; is that
3 correct?

4 A. We had, yes.

5 Q. Okay.

6 Had you -- you had been out, like, with
7 Mr. Sweat and then with Judge Teske and his wife,
8 Deb at the time, like out to dinner; correct?

9 A. That's correct.

10 Q. Okay. More than once?

11 A. Yes.

12 Q. Had you been over to their house for
13 dinner?

14 A. Yeah, I think so.

15 Q. And they had come over to your house for
16 dinner with Mr. Sweat there?

17 A. Yes.

18 Q. Okay.

19 Is it true you all -- all -- that you,
20 Mr. Sweat, Judge Teske, his wife, and Judge Teske's
21 parents went to Les Misérables together?

22 A. I went. I don't believe Keith Sweat went,
23 but I -- I remember going.

24 Q. Okay.

25 A. It was after a Duck Derby function, as a

1 matter of fact.

2 Q. Okay. But it was with Judge Teske and his
3 family?

4 A. That is correct.

5 Q. Okay.

6 Have you ever been to a -- or is it true
7 you've been to a gay bar with Judge Teske and
8 members of his family, along with Mr. Sweat?

9 A. I do not recall going to a gay bar with
10 Teske.

11 Q. Do you recall ever being at some social
12 outing with Judge Teske and his son-in-law?

13 A. I do not recall that, either.

14 Q. Okay.

15 Do you remember, even if it's not like, at
16 a -- you know, at, like, a gay bar, do you remember
17 going to any kind of bar with Judge Teske and his
18 son-in-law during the time you worked there?

19 A. I had met his -- one of his son-in-laws
20 (sic). I actually attended the wedding. But
21 socializing, I do not recall going out with Teske
22 and his son.

23 Q. Okay. About how long did you date
24 Mr. Sweat?

25 MR. MEW: Just object to the form, term,

1 date.

2 BY MR. HILL:

3 Q. Oh. What about -- I don't need months or
4 exact dates, but just, like, years. To the best you
5 can recall, how long did your relationship with
6 Mr. Sweat last?

7 A. 12 years.

8 Q. So from -- so you were in a relationship
9 with him in 2003 when you started. Do you remember
10 when that 12-year period ended?

11 A. I believe it was 2006.

12 Q. Okay. Are you still in touch with
13 Mr. Sweat today?

14 A. No, I have not had contact with him in
15 quite a few years.

16 Q. Okay. Do you consider him to be a credible
17 individual?

18 A. Not really.

19 Q. Okay. Why -- why -- why is that?

20 A. Because of his behaviors and actions after
21 we were no longer together.

22 Q. Okay.

23 What type of behaviors and actions would
24 you be referring to?

25 A. We owned a home together. He refused to

1 return the keys. He refused to have his name removed
2 from the lien (sic). He allowed a friend access to
3 the home -- a friend of his access to the home while
4 I was not present or at the house to retrieve things
5 from the house. And those would be the actions that
6 I'm referring to.

7 Q. I think you might have used the word lien.
8 Did you mean lease? You said -- I -- I --

9 A. Well, I'm sorry. Whatever the -- the legal
10 paperwork is, we were both on the paperwork. The
11 deed, I'm sorry.

12 Q. Oh, you owned the house; is that --

13 A. Yes.

14 Q. Oh, okay. Sorry. Sorry.

15 A. And there was a lien that --

16 Q. I thought you said you were renting.

17 A. -- against -- the -- the home that I was
18 unaware of until the separation, and we ended the
19 relationship.

20 Q. Okay.

21 A. And in order to finally get him off the
22 paperwork, I had to take care of the lien and some
23 other debt that he had incurred with his business.

24 Q. Okay. So you don't trust Mr. Sweat?

25 A. Not at all.

1 Q. Okay. And you probably would not trust him
2 in the future? Sorry.

3 A. Most likely, no.

4 Q. Okay. Nothing he could do to regain your
5 trust; would that be right?

6 MR. MEW: Object to form.

7 THE WITNESS: Probably not.

8 BY MR. HILL:

9 Q. You know who Paul Holland is?

10 A. Yes.

11 Q. Were you also, at one point, in a
12 relationship -- like a romantic relationship with
13 Mr. Holland?

14 MR. MEW: Michael, I just --

15 MR. HILL: Yeah.

16 MR. MEW: And I don't want to make a
17 speaking objection.

18 MR. HILL: Yeah.

19 MR. MEW: I just want to be clear. I don't
20 know where you're going with romantic --

21 MR. HILL: Yeah.

22 MR. MEW: -- relationship. And I want to
23 be, you know, very careful to set parameters on
24 this gentlemen's personal life as it relates to
25 issues that may go into romantic issues. Yeah.

1 MR. HILL: Yeah, I appreciate that, and
2 I'm not trying to get into sordid details or
3 anything like that. I'm trying to -- right?

4 MR. MEW: Well, I don't think anything
5 would be sordid, but yeah, I understand what
6 you mean. Yeah.

7 MR. HILL: Yeah.

8 MR. MEW: Okay.

9 MR. HILL: I'm kind of using that with --
10 I'm sorry. You know --

11 MR. MEW: Yeah, I understand.

12 MR. HILL: Yeah. I'm not trying to get
13 into embarrass -- you know, too involved into
14 -- into personal things. I'm mostly just --
15 scratch that.

16 Could you read back the last question,
17 please?

18 THE COURT REPORTER: Is it true that, at
19 one point, you were also in a relationship with
20 Mr. Holland?

21 BY MR. HILL:

22 Q. Is that true? Is that --

23 A. Yes.

24 Q. Okay. Okay.

25 Do you recall when -- like just years you

1 were in a relationship with Mr. Holland?

2 A. It started out as friendship and then
3 developed. Excuse me. I would say a total of about
4 three years.

5 Q. Okay.

6 So in 2013, the last year of your
7 employment with Clayton County, were you in a
8 relationship with Mr. Holland?

9 A. No, I was not.

10 Q. Okay. Would it have ended in 2012?

11 A. Yes.

12 Q. Okay. Okay. So roughly, 2009 to 2012.

13 Okay.

14 A. Correct.

15 Q. And were you living in Midtown Atlanta at
16 that time when you were in a relationship with
17 Mr. Holland?

18 A. I still owned my home in Jonesboro, and I
19 would go back and forth.

20 Q. Okay. So he lived in Midtown Atlanta. You
21 lived in Jonesboro?

22 A. That is correct.

23 Q. Okay.

24 A. My primary residence was Jonesboro.

25 Q. Okay. Okay.

1 Would you consider Mr. Holland to be a
2 credible individual?

3 A. I -- I suppose so, yes.

4 Q. Okay.

5 And Mr. Holland had also attended staff
6 functions when you worked at Clayton County and met
7 your coworkers; is that right?

8 A. He attended some, but it -- it was very
9 few. He did not like coming to Clayton County. He
10 did not like staying at my home. So his venturing
11 into Clayton County was, again, very limited.

12 Q. If you know, why didn't he like coming to
13 Clayton County?

14 A. You'd have to ask him. I don't know.

15 Q. Okay.

16 During the time you worked for Clayton
17 County, there were also other gay individuals who
18 worked at the juvenile court; correct?

19 A. Yes.

20 Q. Okay.

21 A. I assume so.

22 Q. Okay. Carol Gossett is gay; correct?

23 A. She had revealed that to me but told me
24 that she was living that lifestyle very quietly.

25 Q. Okay. Do you know around what year that

1 was?

2 A. I don't.

3 Q. Okay.

4 Shawn Black or Shawn Wooten is -- he also
5 is gay; is that right?

6 A. Yes, he had told me that -- what his
7 sexual orientation was.

8 Q. Okay.

9 Any other people that you -- any other
10 staff members in the juvenile court that you recall
11 who were also gay?

12 A. I -- I don't recall.

13 Q. Okay.

14 As far as you know, was it commonly known
15 in the juvenile court that Shawn Black was gay?

16 A. I think so, yes.

17 Q. What about Carol Gossett?

18 A. No.

19 Q. Did she tell you that it was -- did she
20 tell you that she was not, you know, open about her
21 sexuality?

22 A. As I recall, yes. And part of it had to do
23 with she was raising her grandchildren, and she had
24 indicated she was trying to protect them, as I
25 recall.

1 Q. Okay.

2 Do you know whether Judge Teske, at the
3 time of your termination, knew that Ms. Gossett was
4 gay?

5 A. You would have to ask him that question. I
6 don't --

7 Q. Okay. So you -- you do not know?

8 A. I don't know.

9 Q. Okay. Do you know whether John Johnson
10 knew that Ms. Gossett was gay?

11 A. I don't know.

12 Q. And Colin Slay? Do you know --

13 A. I don't know.

14 Q. -- whether he knew? Okay.

15 MR. MEW: Just a -- just a caution,
16 Mr. Bostock, and an instruction. Let -- make
17 sure Mr. Hill finishes his question before you
18 begin your answer. And that way, it'll be a
19 clean record.

20 THE WITNESS: I apologize.

21 MR. MEW: No problem.

22 BY MR. HILL:

23 Q. And just for that last question, in case
24 there was any mix-up, you said you do not know
25 whether Colin Slay knew, at the time of your

1 termination, that Ms. Gossett was gay; right?

2 A. That is correct. I -- I don't know.

3 Q. So apart from the Clayton County employees
4 we've discussed, who, if anyone else in Clayton
5 County during the time you worked there, would you
6 contend has a problem or issue with gay people?

7 MR. MEW: Object to form.

8 THE WITNESS: I'm sorry. Could you repeat
9 that question?

10 BY MR. HILL:

11 Q. Who in Clayton County -- and I don't mean
12 physically in Clayton County. I mean, in Clayton
13 County government or employee.

14 Who in Clayton County, if anybody, during
15 the time you worked there, would you contend has a
16 problem or an issue or animus towards gay people?

17 MR. MEW: Just the same objection, but you
18 can answer, Mr. Bostock.

19 THE WITNESS: Well, I've already told you,
20 Jeff Turner.

21 BY MR. HILL:

22 Q. Mm-hmm.

23 A. Sitting here in this moment, I -- I can't
24 think of anyone else right off.

25 Q. Okay.

1 And other than the comments that you
2 testified to earlier, you never heard any other
3 comments or remarks that you interpreted as
4 discriminatory or homophobic while you worked at
5 Clayton County?

6 MR. MEW: I'm just going to object to form
7 as to from whom. You had narrowed your earlier
8 question to Clayton County employees or
9 government, and I didn't -- you know, just
10 didn't know if you meant TV programs or out on
11 the street, or --

12 MR. HILL: Right. I --

13 MR. MEW: So --

14 BY MR. HILL:

15 Q. I did -- I did mean comments by Clayton
16 County employees, that's correct.

17 A. I believe there were homophobic statements
18 and actions in and around the time of my
19 termination, yes.

20 Q. Other than the ones that you've testified
21 to already today, what other homophobic statements
22 are you referring to, if any?

23 A. The conversation between Teske and Sabrina
24 Crawford where he repeatedly said the gay word,
25 slammed his fists on the desk stating that I was --

1 I had joined a gay softball league and that I was
2 spending money in and around Midtown. So that.

3 Q. Okay. Any other -- any other comments or
4 instances that you're referring to?

5 A. Except for the ones I've already testified
6 to --

7 Q. Okay.

8 A. -- that's what I can recall at the moment.

9 Q. And this conversation that you referred to
10 between Sabrina Crawford and Judge Teske, you did
11 not witness that personally; correct?

12 A. I did not witness it. However, I heard
13 Ms. Crawford's testimony. I also saw her statements
14 that she had submitted, including her statement, to
15 the DA's office.

16 Q. Okay. So what you know about that instance
17 is what you've learned from Ms. Crawford; right?

18 A. Yes, through her testimony and
19 documentation.

20 Q. Okay.

21 Before her testimony and documentation,
22 did she ever tell you about that instance -- that
23 conversation with Judge Teske?

24 A. Yes, she did.

25 Q. When did that conversation occur?

1 A. When I was terminated.

2 Q. Okay. Do you recall in the timeline around
3 the termination when that would have occurred?

4 A. It was either that Monday afternoon, or it
5 was Tuesday morning.

6 Q. Okay.

7 A. June 3rd was a Monday.

8 Q. Right. Okay. So it was either the day of
9 the termination or the day after?

10 A. Correct.

11 Q. What did Ms. Crawford tell you?

12 A. She told me that Judge Teske and Colin
13 Slay had visited her on that Friday before and that
14 it -- during the course of the conversation, he
15 repeated -- he repeatedly referred to me as gay.

16 She told me that she asked him to stop and
17 that he became agitated and stood up, slammed his
18 fist on the desk. And said, he joined a gay softball
19 league. He was spending money in and around Midtown.

20 And then he, according to Ms. Crawford,
21 threatened her and her dealership.

22 Q. Okay. Anything else she told you about
23 that conversation that you can recall?

24 A. As I recall, Ms. Crawford said that they
25 were -- that Colin Slay and Teske were actually

1 asked to leave the property.

2 Q. She said that she asked Colin Slay and
3 Judge Teske to leave the property?

4 A. Yes.

5 Q. Did she say whether they left when they --
6 when she asked them to?

7 A. She said they did.

8 Q. Okay. So she didn't have to call security
9 or anything like that?

10 A. Apparently not. I --

11 Q. And you don't have any reason to doubt
12 Ms. Crawford's credibility; do you?

13 A. No, I don't.

14 And if I can go back when you asked, were
15 there any other comments? I was also informed that
16 -- after my termination that the court had a
17 mandatory meeting that was called by Colin Slay,
18 John Johnson, and Teske.

19 And during that staff meeting that Teske,
20 again, referenced my sexual orientation and that I
21 had joined a gay recreational softball league, and
22 that I was misusing money, I believe, in and around
23 the Midtown area.

24 And immediately following that, Richard
25 Belcher was present to do a news story for ABC.

GERALD BOSTOCK
BOSTOCK V. CLAYTON COUNTY

October 14, 2021
37

1 Q. Who told you about this meeting?

2 A. Shelley Johnson.

3 Q. Okay. Did she say that Judge Teske said
4 anything else during that meeting?

5 A. I don't recall. She was noticeably upset
6 when she was giving me that information and said she
7 was very upset during the meeting.

8 Q. Okay. But saying that you had joined a gay
9 softball league, that's a true statement, though;
10 right?

11 A. That is a true statement.

12 Q. That's not a derogatory statement; is it?

13 MR. MEW: Object to form.

14 THE WITNESS: Depends on the tone and --
15 and how the statement was made.

16 BY MR. HILL:

17 Q. Did she tell you how the statement was
18 made?

19 A. She told me that it was very uncomfortable
20 and that it -- it -- certainly, based on what was
21 said, it surrounded the fact that I had joined the
22 softball league and that it was because it was a gay
23 softball league.

24 Q. But she didn't tell you that Judge Teske
25 said it's because it's a gay softball league; did

1 she?

2 A. Yes, I recall her telling me that he said
3 it was a gay softball league.

4 Q. Okay.

5 I understand that Shelley Johnson told you
6 that Judge Teske told the staff that you had joined
7 a gay softball league. But she did not tell you that
8 he went further and said, it's not the fact it's a
9 softball league, it's the fact that it's a gay
10 softball league or anything like that; did she?

11 MR. MEW: Object to form.

12 THE WITNESS: She did -- I don't recall
13 her going into any specifics about the
14 conversation.

15 BY MR. HILL:

16 Q. Okay.

17 A. Other than what I've shared with you
18 already.

19 Q. Okay. Your full name is Gerald Lynn
20 Bostock; correct?

21 A. That is correct.

22 Q. Gone by any other names or known by any
23 other names?

24 A. For many years, my family called me Gerry.

25 Q. Okay.

1 A. And that sort of ended as I started having
2 to sign legal documents and so forth for work, even
3 before I was employed at Clayton County. And my
4 social security card was even changed from Gerry to
5 Gerald.

6 Q. Okay. Was Gerry actually the name on your
7 birth certificate?

8 A. No.

9 Q. Oh, okay.

10 A. Gerald.

11 Q. Okay. What's your address?

12 A. My current address?

13 Q. Yes.

14 A. REDACTED

15 Q. How long have you lived there?

16 A. Since 2014.

17 Q. Okay. Where did you live before?

18 A. After I had to sell my home in Clayton
19 County, I temporarily rented a townhouse. I don't
20 know the exact address right off, but it was
21 Georgetown Townhomes, and it was off Shallowford
22 Road -- access road between Shallowford and Chamblee
23 Tucker. I was there for six months when I bought my
24 current home.

25 Q. Okay. I think I know where that is. I live

1 kind of close to that exit. Okay.

2 So between the current address and your
3 home that you sold in Jonesboro, was that -- the
4 townhome you were renting, is that the only other
5 place you lived?

6 A. That is correct.

7 Q. Okay. You said you had to sell your home
8 in Clayton County?

9 A. Correct.

10 Q. What did you mean, had to sell it?

11 A. I no longer felt comfortable in that
12 county.

13 Q. Why did you no longer feel comfortable
14 there?

15 A. Because I felt threatened not only by the
16 police but by the sheriff's department as I know the
17 relationship that Teske had with -- with those
18 agencies.

19 And, again, I -- I felt as though they had
20 committed homophobic acts towards me and just did
21 not feel comfortable and was not willing to continue
22 to -- to live in that environment.

23 Q. You -- you believe the -- you felt that
24 the police and the sheriff's department had
25 committed homophobic acts against you?

1 A. No, the county.

2 Q. Okay. Did any member of the police force
3 do anything that you saw as homophobic?

4 A. I was unfriended on social media by
5 members of the police and the sheriff's department.

6 Q. Okay.

7 A. So -- I'm sorry.

8 Q. Who unfriended you on social media?

9 A. The one that comes to mind, first of all,
10 is Michael Kearns.

11 Q. Who is he?

12 A. He is the son-in-law of some neighbors --
13 some former neighbors of mine that lived up the
14 street. He married their daughter.

15 Q. He's a -- is he a police officer?

16 A. He's a sheriff's deputy.

17 Q. Sheriff's deputy. Okay. Anybody else come
18 to mind?

19 A. I can't recall right off, but --

20 Q. Okay. Do you know why he unfriended you on
21 social media?

22 A. No, I haven't spoken with him.

23 Q. Okay. Did you believe it was because of
24 your sexual orientation?

25 A. Yes, I did.

1 Q. Why did you believe that?

2 A. Because we would occasionally see each
3 other at my neighbor's home. And all of a sudden,
4 after everything that had happened regarding my
5 termination, he ups and unfriends me suddenly. No
6 explanation.

7 Q. So any other reason that you believed that
8 to be connected with your sexual orientation?

9 A. Uh-uh.

10 Q. Okay.

11 A. No.

12 Q. So other than the unfriending on social
13 media by Deputy Kearns, any other action by the
14 sheriff's department or police department that you
15 interpreted as threatening or unfriendly towards
16 your sexual orientation?

17 A. I just felt uncomfortable that had I been
18 pulled over or if there was any kind of problem at
19 my home, I might be treated differently.

20 Q. You never were pulled over and treated
21 differently in Clayton County; were you?

22 A. No.

23 Q. Okay.

24 And there never was some incident --
25 instance when law enforcement had to come to your

1 home, and you felt you were treated differently
2 because of your sexual orientation; was there?

3 A. Not that I can recall, no.

4 Q. Okay.

5 Did anyone ever tell you that you would be
6 treated differently by law -- the Clayton County law
7 enforcement?

8 A. No.

9 Q. Okay. Do you have a Facebook account?

10 A. I do.

11 Q. Do you have a LinkedIn account?

12 A. No, I don't.

13 Q. Instagram?

14 A. No.

15 Q. Do you have any other social media
16 accounts?

17 A. No.

18 Q. Are you married?

19 A. No.

20 Q. Okay. Do you have any children?

21 A. No.

22 Q. Do you have any family members living
23 within 50 miles of Atlanta?

24 A. I have an uncle on my father's side that
25 is married. And then I have three cousins, their

1 children. They had a home in Lawrenceville. My side
2 of the family is estranged from that side, and I
3 don't know if -- if they're still living in or
4 around the Atlanta area. I can provide you with
5 their information if you want it.

6 Q. Okay. Yes, please.

7 A. My uncle is William Bostock. His wife is
8 Kathy Bostock, spelled with a K. And I believe their
9 oldest daughter is Amanda, and she has married, and
10 her last name is Sap. I've not met her husband and
11 don't know his name.

12 Q. Okay.

13 A. Their next youngest is Kristen with a K.
14 And her last -- she's also now married, and her
15 married name is Wells. And same, I don't know if --
16 I've not met him or I don't know where they live.
17 And then they have a son, and that's Gregory
18 Bostock. And I don't know if he's married or not.

19 Q. Okay. Any other family members in the
20 Metro Atlanta area?

21 A. No.

22 Q. Okay. Did you grow up in Georgia?

23 A. For the most part, yes.

24 Q. Where -- where'd you go to high school?

25 A. Valdosta High School in Valdosta, Georgia.

1 Q. Did you go to college?

2 A. I did.

3 Q. Where did you go?

4 A. I attended Valdosta State. It was Valdosta
5 State College when I was there. It's since become
6 Valdosta State University. And I received my social
7 service certification from the University of
8 Georgia.

9 Q. Okay. Any other post-secondary education?

10 A. No.

11 Q. When did you get that certification you
12 just mentioned?

13 A. I believe it was in or around 1999.

14 Q. Any other degrees or licenses?
15 Certificates like that?

16 A. I had a -- an associate's degree in
17 criminal justice, but other than that, that would be
18 all.

19 Q. That --

20 A. My degree was sociology.

21 Q. Okay. Was your associate's degree from
22 Valdosta State College?

23 A. That is correct.

24 Q. Okay. Were you ever in the military?

25 A. No.

1 Q. Have you ever been convicted of a crime?

2 A. No.

3 Q. Ever been arrested before?

4 A. One time.

5 Q. When was that?

6 A. That was in 1982.

7 Q. And what was that about?

8 A. It was about suspicion of drunk driving.

9 Q. But you were not convicted of a D -- DUI
10 or a DWI?

11 A. No.

12 Q. Okay.

13 Other than the DA investigation that
14 followed your termination have you ever been the
15 subject of a criminal investigation?

16 A. No.

17 Q. You ever been a party to any other
18 judicial proceeding?

19 A. I was a victim of a hit-and-run in 2013. I
20 believe it was April.

21 Q. Was there a lawsuit about that?

22 A. There was.

23 Q. There was? Where was the lawsuit?

24 A. Fulton County.

25 Q. Fulton County. What was the outcome of

1 that?

2 A. The -- the driver, fortunately, was
3 apprehended because there were a lot of witnesses
4 that were able to get his license plate. So the --
5 the driver was apprehended and had to go to court.

6 Q. And --

7 A. My understanding --

8 Q. Sorry. I didn't mean to cut you off.

9 A. My understanding is he lost his insurance
10 and was no longer able to drive. I filed a claim --
11 or a suit against him with The Lake Law Firm, and
12 there was a settlement agreement.

13 Q. What was his name? The driver?

14 A. I don't recall.

15 Q. When you went to court, did you have to
16 testify?

17 A. I actually did not have to go to court.

18 Q. Okay. But the court case was in Fulton
19 County; is that what you said?

20 A. That is correct.

21 Q. Do you remember if it was Superior Court?

22 A. I don't.

23 Q. Okay. Have you ever been divorced?

24 A. No.

25 Q. You ever filed for bankruptcy?

1 A. No.

2 Q. Any other judicial proceedings under the
3 -- other than this hit-and-run that you mentioned
4 and this case?

5 A. I was the victim of a burglary, but I
6 don't know that the police ever apprehended the
7 suspect.

8 Q. When was that?

9 A. That was probably in or around 2004 or
10 2005.

11 Q. You ever been a witness in any other
12 judicial proceeding?

13 A. No.

14 Q. Okay. And you've never testified in court;
15 is that right?

16 A. Other than work-related situations.

17 Q. Oh, right. Okay.

18 And you mean work-related, like when you
19 were working for the juvenile court?

20 A. And also, the Department of Family &
21 Children Services as a child welfare investigator.

22 Q. Okay. So after college, what was your
23 first job?

24 A. After college, I remained with my employer
25 that I had been with for quite a while all through

1 school, Barr Enterprises. I worked one more year
2 after I had graduated.

3 From that position, I took a job with the
4 Department of Family & Children Services.

5 Q. Okay. When -- when did that job start?

6 A. I want to say '88 -- 1988 or 1989.

7 Q. Okay. And what was your position there?

8 A. I started out as a food stamp caseworker
9 and then moved into the Child Welfare Unit as foster
10 care worker and then child -- child welfare
11 investigator.

12 Q. Okay. So when did that job end?

13 A. That job ended in or around '96, I
14 believe.

15 Q. Okay. And then what did you do next?

16 A. I relocated back to Valdosta to take a
17 position at a psychiatric hospital. It was called
18 Greenleaf.

19 Q. What -- what type of work were you doing
20 there?

21 A. I was an intake -- for admissions, I was
22 an intake staff.

23 Q. Okay.

24 A. So I did initial assessments.

25 Q. Okay. Was it focused on children or

1 adults?

2 A. Both.

3 Q. Both. Okay. How long did that job last?

4 A. I believe I was there about three years.

5 Q. Okay. So until about '99?

6 A. I can't recall right off.

7 Q. Okay. What did you do next?

8 A. I moved to Athens. I had a job opportunity

9 with the Northeast Georgia Regional Development

10 Center as their JTPA -- I'm sorry -- Title -- Title

11 III Coordinator for dislocated workers.

12 Q. Okay. How long did you do that job?

13 A. For a couple years.

14 Q. Okay. And then what did you do after that?

15 A. I -- I went to work with Safeco Insurance.

16 Q. What were you doing for Safeco?

17 A. I was a customer service rep.

18 Q. Okay. And then when did you leave that

19 job?

20 A. That must've been around 2000.

21 Q. Okay. And then what did you do?

22 A. I had moved to Key West. And then I was
23 introduced to the Guardian Ad Litem Program, which
24 is the equivalent of CASA. Some states refer to it
25 as guardian ad litem. Some states call it CASA.

1 Q. Mm-hmm.

2 A. And I became a caseload supervisor,
3 monitoring volunteers that were assigned to kids
4 within my caseload -- in the -- I think it's the
5 11th Circuit in Florida or the 12th Circuit. I can't
6 recall.

7 Q. How did you get introduced to the GAL,
8 CASA work?

9 A. My partner at the time had been
10 transferred with his company. He worked for
11 Marriott.

12 Q. Okay.

13 A. And so we were transferred to a Marriott
14 property on Key West. And one of his staff that
15 worked part-time also worked for the Guardian Ad
16 Litem Program. And she found out about my history
17 and suggested that I consider applying for a
18 position they had open.

19 Q. Okay.

20 A. And I did.

21 Q. So what year are we in now? That's 2000;
22 is that right?

23 A. Mm-hmm.

24 Q. Okay.

25 A. Yeah, we were in Key West a year, and

1 Marriott transferred Mr. Sweat back to Atlanta.

2 Q. Okay. So about 2001, you came back to
3 Atlanta?

4 A. Yeah.

5 Q. Where did you -- where did you work then?

6 A. I had applied for a position at Clayton
7 County Juvenile Court, and I'd also applied for a
8 position with the Superior Court of DeKalb County.

9 And I got the job at DeKalb County, worked
10 there for a very brief period when I heard back from
11 Clayton County Juvenile Court, and received the job
12 offer. And it was substantially more money than the
13 DeKalb County position. It was a jury clerk at
14 Superior Court, so I took the job with Clayton
15 County.

16 Q. So when people -- the DeKalb County job,
17 when -- would you be the person when someone is
18 called in for jury duty, and they show up and say,
19 hey, I'm here for -- like, would it be that kind of
20 clerk?

21 A. Yeah. Mm-hmm.

22 Q. Okay.

23 A. Yeah. Yes.

24 Q. Okay. And so then you -- what was your job
25 at Clayton County when you started?

1 A. When I started with Clayton County, my
2 title was CASA Program Coordinator.

3 Q. Okay. And when did that change? That
4 title?

5 A. I don't recall exactly what year, but
6 there was some reorganization. And the Court created
7 Child Welfare Services, which combined the CASA
8 Program and what's also referred to as the Citizen
9 Panel Review. So they combined both of those two
10 units, and I was named the Child Welfare Services
11 Coordinator.

12 Q. Okay. And then at some point, you became
13 the Child Welfare Director; is that right?

14 A. No, I never had --

15 Q. No.

16 A. -- that title.

17 Q. Oh, okay. Would -- when the department was
18 reorganized, and your title was changed, was that a
19 promotion?

20 A. Technically, I would say yes, but
21 financially, no.

22 Q. What do you mean?

23 A. I was asked --

24 Q. Didn't mean to cut you off. What --

25 A. I was asked to do more and have more

1 responsibility without any kind of financial
2 increase in my pay.

3 Q. Okay. Were -- did you ever -- were you
4 ever promoted while you were working at Clayton
5 County?

6 A. If I'm understanding your question
7 correctly, that was considered a promotion --

8 Q. Okay.

9 A. -- at least in my eyes, to Child Welfare
10 Services Coordinator, but there was no financial
11 gain from it.

12 Q. Okay.

13 A. But beyond that, there were no other
14 promotions.

15 Q. Okay. And no other changes in
16 responsibilities?

17 A. Other than some additional tasks as Child
18 Welfare Services Coordinator, which I was asked to
19 take over the Court Improvement Initiative for
20 Clayton County.

21 The -- the various juvenile courts within
22 a particular region met on a -- like a quarterly
23 basis. And so I was the representative for Clayton
24 County, along with one of our judges.

25 Q. Okay. You did get some pay increases

1 throughout your employment at Clayton County;
2 correct?

3 A. I did.

4 Q. Okay. Were these, like, annual increases?

5 A. Correct.

6 Q. Okay.

7 Be -- before Clayton County, you're -- the
8 prior employment that we just went over, have you
9 ever been fired or involuntarily terminated from any
10 of those other jobs?

11 A. No.

12 Q. Have you ever been asked to leave a job
13 before?

14 A. No.

15 MR. MEW: Hey, Michael?

16 MR. HILL: Yeah.

17 MR. MEW: When you get to a reasonable
18 stopping point -- I don't know -- we are about
19 an hour in, could we take about five?

20 MR. HILL: Yeah, give me another minute or
21 so.

22 MR. MEW: Sure.

23 BY MR. HILL:

24 Q. Other than the complaint and EEOC charge
25 at issue in this case, have you ever filed, like, a

1 grievance, complaint, charge against any other
2 employer?

3 A. No. Not that I can recall, no.

4 Q. Have you ever made any kind of HR
5 complaint to another employer?

6 A. I have gone to HR to talk about situations
7 in the past, yes.

8 Q. At other employers?

9 A. At other employers.

10 Q. How many times?

11 A. Maybe twice.

12 Q. So what was the first one?

13 A. When I was employed at Neiman Marcus.

14 Q. That was before Clayton County?

15 A. That was after.

16 Q. Okay. Okay. What was the second one?

17 A. The second one would be at Georgia
18 Regional.

19 Q. Okay. Okay. I'll get to a stopping point
20 in just a second. But can you tell me about the
21 Neiman Marcus one?

22 A. I had a coworker that had issue with my
23 sexual orientation, as well as other Neiman Marcus
24 employees' sexual orientation. And I thought it was
25 inappropriate and so I went to HR.

1 Q. Who was that coworker?

2 A. I -- I -- she has a very difficult first
3 name. I'll try to think of it, but right off, I
4 can't remember her name -- her first name, and I --
5 I don't know her last name at this point.

6 Q. Did you call her another name? Like, did
7 she have a nickname that was not so difficult?

8 A. She did have a nickname because her first
9 name was so difficult.

10 Q. Right.

11 A. And at the time that there were
12 conversations about her negativity towards those
13 employees that identified as gay, it was suggested
14 by HR that not only the department I was in but
15 storewide that no one was to call her by her
16 nickname, which was not anything racially or
17 inappropriate.

18 It was just a shortened version, as I
19 recall, of her long first name. So everyone complied
20 and started calling her by her full name.

21 Q. What did that have to do with the sexual
22 orientation complaint? I'm not sure I see the
23 connection between that.

24 A. I don't really know, other than that's
25 what we -- when those conversations about her

1 negativity towards the employees that identified as
2 gay, the company was also aware that storewide she
3 was being called by a -- a name that wasn't her
4 actual name. And so everyone in the store was
5 instructed to call everybody by their correct full
6 name.

7 Q. Okay. Did she -- so did she not like being
8 called this nickname?

9 A. That's how she introduced herself to me
10 when I first started.

11 Q. Okay.

12 What were the -- what did she say or do
13 that led you and others to believe she had an issue
14 with people's sexuality?

15 A. She would make comments, such as gay
16 Marcus, instead of Neiman Marcus, gay Neiman, or
17 just gay Neiman Marcus.

18 Q. So what did Neiman Marcus -- other than
19 instructing everyone to call her by her full name,
20 what did Neiman Marcus do to address these
21 complaints?

22 A. I don't know. You'd have to speak to the
23 management of Neiman Marcus. I know that her
24 comments ceased, as I recall.

25 Q. Okay.

1 facilitators. There were about six of us, maybe a
2 few more.

3 And it was beginning to feel like a
4 hostile work environment. And most, if not all of
5 the treatment team facilitators had gotten together
6 and decided that we would go to HR to voice our
7 concerns.

8 So that's what happened. And the result of
9 that -- after a period of time, it resulted in her
10 being terminated.

11 Q. Okay. And what was her name?

12 A. Teresa Jones.

13 Q. Teresa Jones.

14 And what is it that -- when you said it
15 started to feel like a hostile work environment,
16 what are you referring to?

17 A. She would call meetings at the drop of a
18 hat and expect you to be present at those meetings.
19 And oftentimes, those conflicted with our doctors'
20 schedules.

21 Meaning, for example, my -- my doctor on
22 my unit had a particular time that she met for her
23 treatment team, which was a multidisciplinary group.
24 It would include nursing, social work, activity
25 therapists.

1 So -- and I was responsible for managing
2 the doctor's team --

3 Q. Mm-hmm.

4 A. -- and coordinating schedules and making
5 sure -- so when -- when our director would call
6 these last-minute meetings, again, often they would
7 conflict not only with my team but the other teams.

8 And she became very verbal about it in --
9 in departmental meetings that we weren't following
10 her instructions. She would say you did something
11 you did not do, or -- I don't know. Just a variety
12 of things that really began to feel like she was
13 being hostile. Not to just one person, but to the
14 entire group.

15 Q. Okay.

16 Did -- was this a -- a -- were there any,
17 like, anti-gay or any comments related to sexual
18 orientation regarding this supervisor?

19 A. I don't know for sure.

20 Q. I -- well, I meant by you. Any complaints
21 by you in that regard regarding her?

22 A. I don't know.

23 Q. Oh, okay.

24 What you complained about was the way she
25 was running the team and the way she was acting as a

1 manager, in -- generally; right?

2 A. Yes.

3 Q. Okay. Okay. Okay.

4 I just wanted to make sure you -- you
5 didn't go to HR and complain about her having any
6 sort of, like, an anti-gay animus; right?

7 A. Correct. I did not --

8 Q. Okay.

9 A. -- do that.

10 Q. So -- so other than those two -- Neiman
11 Marcus, Georgia Regional, at any of the -- you did
12 not make any type of HR complaint to an employer
13 before Clayton County?

14 A. No.

15 Q. Okay.

16 You mentioned going to Jane Tuttle
17 earlier. When you -- about a -- a comment they said
18 John Johnson made towards you. Do you recall that
19 part of your testimony?

20 A. I do.

21 Q. Okay. How did Jane respond to you?

22 A. To know Jane is to love Jane. She was very
23 concerned and very supportive of me. And as I
24 recall, she may have even said, I'll keep an eye out
25 on things, something to that effect.

1 Q. Okay. Do you know if she took any action
2 against John Johnson?

3 A. I don't know.

4 Q. Okay. Did she do anything else other than
5 tell you she would keep an eye out?

6 A. Other than just supporting me in general,
7 that's all I can recall.

8 Q. When you say supporting you in general,
9 what did she do to support you?

10 A. She would make -- let me think of the
11 right word to use.

12 She would make very appropriate,
13 encouraging comments to me moving forward. Like, you
14 know you're appreciated. Don't let this get you
15 down. Let's keep moving forward. You know, those
16 types of words of encouragement. You're doing a
17 great job.

18 When the incident happened, she actually
19 hugged me. And she -- and she said that she was
20 sorry that John had made those comments --

21 Q. Okay.

22 A. -- or made that comment.

23 Q. And Jane was not your supervisor at any
24 point; was she?

25 A. Jane was the grants manager. And I did

1 report to her in a supervisory manner because she
2 was involved in, at any given time, four of the
3 grants that were coming into the CASA Program at
4 juvenile court. She was instrumental in the -- the
5 writing of those grants and then some of the
6 oversight of those grants.

7 So I did report to her as far as I did to
8 other court administration, numbers both on
9 volunteers and children served and activities of the
10 program.

11 Q. Okay. So you reported to her to the extent
12 your job had anything to do with grants?

13 A. Yes.

14 Q. Okay.

15 A. Including --

16 Q. Including what?

17 A. Including the CASA Grant, which, as I
18 recall, primarily supplemented my -- or covered a
19 large portion of my position.

20 Q. Okay.

21 When -- and during the meeting, when John
22 Johnson and Colin Slay were informing you of your
23 termination, and you testified that you said to John
24 Johnson, I know what this is about, what did you
25 mean when you said, I know what this is about?

1 A. I knew immediately that it was because of
2 my sexual orientation and that I was being
3 discriminated against.

4 Q. Okay.

5 At that time, what is it that led you to
6 believe that was the reason?

7 A. Well, number one, the comment by John
8 Johnson earlier about -- that we just discussed.

9 Q. The one from 2003?

10 A. Yeah.

11 Q. Okay.

12 A. Number two, him bringing up gay again. The
13 information that I had been given regarding the
14 meeting that had been held with Heritage Cadillac
15 with Sabrina Crawford and the word gay continually
16 was being used, and she even had to ask them to
17 stop.

18 The day of the termination, Mr. Johnson
19 bringing my sexual orientation into the
20 conversation. Immediately following my termination,
21 the information about the court meeting where the
22 word gay was used again multiple times.

23 Q. Mm-hmm.

24 A. And also, the 2014 audits that occurred.
25 There were three that I'm aware of. One was the

1 Juvenile Justice Incentive Grant that was handled by
2 Kendra Stevens. The results of that audit revealed
3 that it was poorly implemented and developed --

4 Q. Mm-hmm.

5 A. -- with little to no monitoring of the
6 expenditures. There was the Ford Promise Grant that
7 was handled by Sheryl Teske, Teske's wife. And it
8 had the same findings. That it was poorly developed,
9 and it was little to no oversight.

10 And the VOCA Grant, which stands for
11 Victims of Crime Act. That was actually a grant that
12 came into the court, federal money for the CASA
13 Program. And Sheryl Teske and Angela Martin, I
14 believe, were the two that handled that grant.

15 And it also had the same findings that the
16 grant was poorly developed and improperly
17 implemented with no oversight. And what was
18 concerning on the VOCA Grant was all of the
19 expenditures halfway through the grant period had
20 been disallowed.

21 So there was an additional audit done in
22 2015 on the VOCA Grant handled by the same two
23 people, Angela Martin and Sheryl Teske. And it had
24 the same results. And in the conclusion stated that
25 previous year's audit -- that the problems

1 identified had not been corrected. And once again,
2 the expenditures that had been submitted before that
3 grant were disallowed, placing the -- the monies at
4 risk.

5 Then in 2017, Stacey Merritt sent an
6 e-mail about the child welfare services director not
7 complying with the proper handling of the GAL funds
8 and requested additional training, I believe.

9 Also, in 2017, there was an audit on the
10 GAL money that was apparently directed through the
11 court. And it also indicated that it has been poorly
12 developed and implemented and that there was no good
13 controls in place for those monies.

14 In 2019, there was an audit released on
15 the juvenile court bank account. And that audit
16 showed that the responsible person was Angela Buggs,
17 I believe, Clerk of Court. And there were some
18 errors in the handling of the -- of funds.

19 And that audit result was -- it stated
20 that there needed to be immediate corrective action.
21 Recommendation was training and automation for the
22 clerk's department.

23 Q. Mm-hmm.

24 A. And my understanding is, during that
25 process, none of those individuals were terminated.

1 Q. Anything else?

2 A. On that --

3 Q. Yeah.

4 A. -- topic?

5 Q. Yeah, just -- I just wanted to be sure I
6 had a comprehensive list --

7 A. As I can --

8 Q. -- of infractions.

9 A. -- recall at the moment, that's --

10 Q. Okay.

11 So out of all of -- all of those that you
12 just listed, other than the John Johnson alleged
13 comment from 2003, all of those others happened
14 after you said, I know what this is about; right?

15 A. Yes.

16 Q. Okay.

17 So at the time that you said, I know what
18 this is about, you were basing that just on John
19 Johnson's comment from 2003?

20 MR. MEW: Object to form.

21 THE WITNESS: No, I'm basing that on -- it
22 was not until I had joined the Hotlanta
23 Softball League that all of this seemed to
24 surface. So the timeline -- months after
25 joining the league, end up being terminated.

1 Again, according to testimony and the
2 diary that was submitted, the -- the gay word
3 being used eight times, those did happen prior
4 to my termination.

5 BY MR. HILL:

6 Q. Right. But you didn't know about those.

7 A. Correct.

8 Q. Right. So I'm just focusing on what you
9 meant when you said, I know what this is about. You
10 -- you couldn't have been talking about the diary
11 entries because you didn't know about those; right?

12 A. At the time, no.

13 Q. Right.

14 So you got, like, the comment from 2003.
15 You've got the Hotlanta Softball League. Anything
16 else on that day in June 3rd, 2013, that you were
17 thinking of when you said, I know what this is
18 about?

19 A. No, but with that being said, I think the
20 Hotlanta Softball League carried a lot of weight.

21 Q. Why do -- why do you think so?

22 A. Certainly based on comments since the
23 termination by administration of the court.

24 Q. But you believe that at the time that you
25 joined the Hotlanta Softball League, Judge Teske,

1 John Johnson, Colin Slay, everyone knew you were
2 gay; right?

3 A. Pretty much, yes.

4 Q. Okay. No reason to think they didn't know
5 that; right?

6 A. Correct.

7 Q. So you're not saying that they just
8 learned about your sexuality when they found out you
9 joined the Hotlanta Softball League; are you?

10 A. No, I did not suggest that.

11 Q. Okay.

12 We spoke earlier about a period when you
13 would sometimes be in -- stay in Jonesboro, and
14 sometimes you'd stay with Mr. Holland in Midtown;
15 right?

16 A. That is correct.

17 Q. Okay.

18 During that time, do you know how --
19 about, like, how frequently would you be staying --
20 you know, like, how many days a week would you be
21 staying in Jonesboro versus Midtown?

22 A. I don't recall specifically, you know,
23 right here today.

24 Q. Yeah.

25 A. What I do recall is that I did not --

1 initially, it was a back and forth, and it was over
2 time that during that brief period of a few years
3 that I began to actually spend the night and stay
4 there.

5 And then towards the end of the
6 relationship, I was more full-time there than in
7 Jonesboro, but there would still be periods that I
8 would return to Jonesboro and --

9 Q. Okay.

10 A. -- and stay at my home.

11 Q. So when you say, towards the end, would
12 you mean like -- like all of 2012?

13 A. Maybe 2012, yes.

14 Q. Okay.

15 Would it be like a -- a -- would you be in
16 -- would you be staying the night in Atlanta, like,
17 more -- you know, more than 50 percent of the time?

18 A. That's probably fair.

19 Q. Okay.

20 Would you say it would be, like, almost
21 every night during the week during that period?

22 A. Towards the end.

23 Q. Okay.

24 A. I recall a lot of times, you know,
25 returning to the home on the weekend to, you know,

1 take care of the yard or make sure I'd gotten all
2 the mail-in and just checked on the -- on the house.

3 Q. Okay.

4 Let's talk about the Child -- Child
5 Welfare Office a little bit. What -- did you say the
6 Child Welfare -- sorry, I have trouble saying that
7 word.

8 Did you say the Child Welfare Office was
9 something that resulted from a departmental
10 reorganization?

11 A. Yeah, I -- I believe so.

12 Q. Okay.

13 What is Clayton County CASA? Is that the
14 same thing as the Child Welfare -- Child Welfare
15 Office?

16 A. Clayton County CASA is a program of Child
17 Welfare.

18 Q. Okay. So does the Child Welfare Office
19 have, like, a purpose or mission?

20 A. Not that I was ever aware of. Again, it
21 was a decision to combine the two programs of the
22 court that worked with child abuse victims. CASA
23 being all the services that they provided and then
24 the Citizen Panel Review, which handled reviews of
25 DFCS cases to sort of supplement the regular hearing

1 schedule.

2 Q. Okay.

3 And then when those two programs were
4 combined, you were in charge of both Citizen Panel
5 Review and Clayton County CASA; is that right?

6 A. Correct.

7 Q. Okay.

8 Would there be any other programs like
9 that that would have come under you?

10 A. No.

11 Q. Okay.

12 And so the structure of the Child Welfare
13 Office --like the organizational structure -- you
14 were the Child Welfare coordinator; right?

15 A. Correct.

16 Q. And then under you, you would have, like,
17 CASA volunteer supervisors; is that right?

18 A. Directly under me would have been Concilia
19 Chilumuna, who was the program coordinator of
20 Citizen Panel Review.

21 Q. Okay.

22 A. So in other words, I would kind of refer
23 to her as my right hand.

24 Q. Okay.

25 And then was there someone else kind of on

1 Ms. Chilumuna's level who would be in charge of CASA
2 volunteer supervisors?

3 A. No.

4 Q. Okay.

5 So it would be you, then Ms. Chilumuna
6 directly beneath you, and then beneath her would be
7 the volunteer supervisors?

8 A. I'm sorry. I don't understand your
9 question.

10 Q. There is a position called a CASA
11 volunteer supervisor; is that right?

12 A. That is correct.

13 Q. Okay. And there are lots of people who
14 were volunteer supervisors; right?

15 A. Correct.

16 Q. Like Griffin Shirley, for example, is one;
17 right?

18 A. Correct.

19 Q. Okay. Shelley Johnson was one?

20 A. Correct.

21 Q. Okay. And so those people supervised
22 nonemployee volunteers; right?

23 A. Correct.

24 Q. Okay.

25 And those volunteers were the -- they were

1 the court-appointed special advocates; right?

2 A. Correct.

3 Q. Okay. Who did those volunteer supervisors
4 report to?

5 A. The CASA volunteer supervisors reported
6 directly to me.

7 Q. Okay.

8 A. In my absence, it was kind of a -- a
9 wishy-washy setup by court administration because
10 even though Ms. Chilumuna was -- her -- had her
11 title and her position, she had one staff member
12 that reported directly to her that was outside of my
13 supervision.

14 Q. Who was that?

15 A. I think Belkus something or other. I can't
16 -- that position turned over several times
17 throughout my tenure there. But in -- if I were out,
18 I always felt as though all staff within Child
19 Welfare would report to Ms. Chilumuna if they needed
20 something.

21 Q. Okay.

22 A. The court administration always did not
23 see it that way, and they wanted her to be handled
24 separately and not step in -- in a CASA
25 responsibility role.

1 Q. Okay. And you got along with
2 Ms. Chilumuna; right?

3 A. Correct.

4 Q. Okay.

5 A. I feel like we did.

6 Q. Okay. Anyone else beneath you in the
7 organizational structure?

8 A. Well, we had a -- the CASA volunteer
9 supervisors, and we also had a CASA volunteer
10 recruiter position.

11 Q. Okay. Okay. Who was in that position?

12 A. Becky Galbraith had that position for a
13 good number of years.

14 Q. Okay. And she reported directly to you?

15 A. Correct.

16 Q. Okay.

17 And so I guess as her title suggests, her
18 main job was to go out and recruit people to become
19 CASA volunteers?

20 A. She would, primarily, yes, assist with
21 recruiting efforts. She would also screen the
22 potential volunteers. She would also process
23 volunteer applications, and she would handle most of
24 the training for Clayton County CASA unless it was a
25 training session that was part of the Metro CASA

1 collaborative, which included Clayton, Cobb, DeKalb,
2 Fulton, and Gwinnett.

3 Q. Okay.

4 If she had some expense for which she
5 needed reimbursement, what would be her process for
6 that at that time?

7 A. She would submit it to me.

8 Q. Okay. Like an expense reimbursement form?

9 A. Mm-hmm. Correct.

10 Q. Okay. And so would the reimbursement money
11 for that come from the -- the GAL account?

12 A. When any reimbursement request crossed my
13 desk, we would be looking at what was the
14 reimbursement for.

15 Q. Okay.

16 A. If it was mileage for her -- for example,
17 again, our trainings that we collaboratively worked
18 with the Metro collaborative group, if there was a
19 training group in Fulton County and she drove to
20 Fulton County, she would request mileage
21 reimbursement. So that might -- would be on the
22 county mileage form.

23 Q. Okay.

24 A. Now, as a supervisor, I was always, as I
25 assume all supervisors were, always updated on how

1 much money was in the county's travel budget for the
2 juvenile court. And there was times where there
3 would be, I guess, maybe an excess amount.

4 And they would encourage us, if you've got
5 any mileage or travel-related, make sure you're
6 charging it to the juvenile court. If they -- those
7 funds were running low, it might be a case where,
8 okay, you did this training. We might -- could apply
9 it towards X, Y, or Z grant.

10 Q. Mm-hmm. Okay.

11 So depending on the purpose of the
12 expense, there could be different sources of funding
13 for it; is that right?

14 A. That's correct.

15 Q. Okay.

16 Some of it would be grants that had
17 specific functions; right? And some of it would be
18 line items in the county's budget; right?

19 A. Correct.

20 Q. Okay. And then who did you report to?

21 A. I had several supervisors, but at my time
22 of termination, it was Colin Slay as, I believed,
23 Chief of Staff.

24 Q. Okay. And Colin Slay reported to John
25 Johnson?

1 A. That's my understanding.

2 Q. Okay. And did John Johnson report to
3 Judge Teske?

4 A. I imagine so, yes.

5 Q. Okay.

6 You said you had several supervisors. I
7 know you mentioned Jane Tuttle earlier. Any others?

8 A. No.

9 Q. Okay.

10 So you reported to Colin Slay as chief of
11 staff, but then also to Jane Tuttle when it comes to
12 grant-related issues?

13 A. Yes.

14 Q. Okay. The people who become CASA
15 volunteers, they have to take an oath; right?

16 A. They don't necessarily take an oath, but
17 they -- they do get sworn in --

18 Q. Okay.

19 A. -- by the juvenile court -- one of the
20 juvenile court judges.

21 Q. Okay. And they have to undergo some sort
22 of training?

23 A. That is correct. After they've been
24 screened, they -- they go through a mandatory
25 training. And that training program is the same

1 whether you're in Clayton County or whether you're
2 in Los Angeles. It -- we -- the program follows a
3 national CASA curriculum.

4 Q. Okay. And it's -- it's like eight weeks of
5 training; is that right?

6 A. It can vary depending on how many days a
7 week the facilitator, you know, scheduled the
8 training. Sometimes there might be a rush to
9 training to get volunteers sworn in quicker. And the
10 -- the -- the group might meet every night during
11 that week or it -- it might be twice a week, or it
12 might be once a week. It's based on hours.

13 Q. Got it. Okay. What -- do you know how
14 many hours the training is?

15 A. I honestly don't recall.

16 Q. Okay. And is it -- is there, like,
17 periodic updates to the training as someone who's a
18 volunteer?

19 A. I don't recall many, if -- if at all,
20 while I was employed by Clayton County.

21 Q. Okay. Just that initial training, then the
22 swearing-in; is that -- is that it?

23 A. Now, are you talking about the curriculum
24 for CASA or --

25 Q. Yeah, just the -- just the people who are

1 serving as CASA volunteers in Clayton County. I just
2 meant, is their training just that initial however
3 many hours -- might be eight weeks, could be more or
4 less depending on how frequent.

5 But is it just that initial period of
6 training, then they get sworn in, and then they're
7 CASA volunteers, and no more training; is that what
8 you're saying?

9 A. No, that's not what I'm saying.

10 Q. Okay.

11 A. And -- and I better understand your
12 question now.

13 Q. Okay.

14 A. So thank you.

15 If that CASA volunteer decided to become a
16 GAL volunteer and work Superior Court cases, they
17 would have to go through, I believe it was, an
18 additional eight-hour training program in order to
19 be able to do that.

20 But regardless, whether you become just a
21 CASA volunteer or you move and do Superior Court
22 cases, there were always training opportunities that
23 we made available to our volunteers.

24 The Georgia CASA State Office for CASA
25 programs all throughout the State held an annual

1 conference with training sessions. The National CASA
2 Organization always provided a -- a national
3 conference, and it traveled around the country, and
4 volunteers had the opportunities to go to those.

5 As we would identify training
6 opportunities, perhaps, through the DA's office,
7 through whatever organization, we would make that
8 known to the volunteers so that they could improve
9 on their skills.

10 Q. Okay.

11 What's the difference between cases that
12 were in Superior Court versus Juvenile Court?

13 A. So the cases before the Juvenile Court
14 would be considered deprivation cases, meaning child
15 abuse and neglect cases. The cases that were before
16 the Superior Court were for children involved in
17 custody dispute hearings.

18 Q. Okay. And a CASA volunteer would be
19 assigned to the Juvenile Court cases?

20 A. Correct.

21 Q. Okay. But a GAL would be assigned to the
22 Superior Court cases; right?

23 A. That is correct.

24 Q. Okay.

25 At the time you worked there, Carol

1 Gossett was in charge of the GALs; is that correct?

2 A. That is correct.

3 Q. Okay. So what are the duties of a CASA
4 volunteer?

5 A. The CASA volunteer is charged with
6 basically getting to know the child that's involved
7 in the case. The CASA volunteer would visit the
8 child, perhaps, at school.

9 If the child was involved -- just, for
10 example, say, maybe played on a -- on a football
11 team, they might go to the field and watch the child
12 practice. They would not only establish some rapport
13 with the child, but they would also be gathering
14 information that they would put into report form and
15 then submit that report to the court prior to that
16 child having to go to court.

17 And an additional role would be if the
18 CASA volunteer was available to come to court the
19 day of court, they would do so to stand up and be
20 the voice of the child during that court proceeding.
21 If the CASA volunteer was unable to attend, they
22 would have already submitted their report to their
23 CASA volunteer supervisor.

24 Q. Mm-hmm.

25 A. And then that volunteer supervisor would

1 stand in for that volunteer in the courtroom.

2 Q. And just in case this isn't in the record
3 anywhere, what is a deprivation hearing?

4 A. That would be a case where there is
5 suspected or confirmed child abuse and neglect, and
6 the child has most likely been removed from the home
7 and has been placed in foster care --

8 Q. Okay.

9 A. -- or, perhaps, relative care.

10 Q. Okay. And that's when a CASA volunteer
11 gets involved for those cases?

12 A. Correct.

13 Q. Any other type of cases, besides
14 deprivation hearing, that a CASA volunteer would be
15 assigned to?

16 A. No.

17 Q. Okay. So does being a CASA volunteer
18 entail a considerable time commitment?

19 A. I believe it does if you do -- if you do
20 the job of a -- of a true CASA volunteer, yes.

21 Q. What do you think it is, like, hours per
22 week?

23 A. It could be upwards of six or eight,
24 depending.

25 Q. Okay.

1 So I guess by definition, all these
2 families being affected in the child deprivation
3 hearing these are families going through a rough
4 time; right?

5 A. Correct.

6 Q. Probably a low point for most of these
7 people's lives talking about the families?

8 A. It could be, yes, considered that.

9 Q. Most of these families of, like, low
10 economic status?

11 MR. MEW: Object to form.

12 THE WITNESS: Child abuse and neglect does
13 not discriminate.

14 BY MR. HILL:

15 Q. But the ones -- just based on your
16 experience in Clayton County, are most of the
17 families in these child deprivation hearings low
18 economic status families?

19 MR. MEW: Same objection.

20 THE WITNESS: It was a mix. And quite
21 personally, we did not involve ourselves in --
22 necessarily in the financial matters of a case
23 unless the deprivation -- the -- the abuse or
24 neglect may have been as a result of the -- the
25 child's financial status.

1 BY MR. HILL:

2 Q. Okay. So you wouldn't know if, like, most
3 of these families were, like, below the poverty line
4 or not?

5 A. I did not track that, no.

6 Q. Okay. And even though you didn't track it,
7 do you have any idea?

8 MR. MEW: Object to form.

9 THE WITNESS: As stated, no. It --

10 BY MR. HILL:

11 Q. Okay.

12 A. Child abuse does not discriminate.

13 Q. Would it be true that most of these
14 families in the deprivation hearing -- would most of
15 them be African American families?

16 MR. MEW: Same objection.

17 BY MR. HILL:

18 Q. Just based on your recollection?

19 A. And that's what I'm trying to do. So if I
20 -- I could have a moment, please?

21 Q. Sure.

22 A. Just a sec.

23 I guess for me, I wasn't looking at skin
24 color. So it's hard for me to answer that question.
25 What I saw was a child in need. So that's a

1 difficult question to answer. I don't -- I don't
2 know how to answer that.

3 Q. Okay. You don't notice someone's skin
4 color when you see them?

5 A. When I walked into a courtroom, I was
6 seeing a child.

7 Q. Right.

8 A. Yes.

9 Q. I just mean generally. It's something I've
10 heard people say, I don't notice color. I'm just
11 saying, is that something that you would say just in
12 your daily life, I don't notice skin color?

13 MR. MEW: Object to form.

14 THE WITNESS: I've heard that comment as
15 it relates to the delinquency side of juvenile
16 court, but I -- I'm not familiar with comments
17 about the percentage of the children in DFCS
18 custody.

19 BY MR. HILL:

20 Q. What -- what comment have you heard about
21 the delinquency side?

22 A. That it's predominantly black.

23 Q. Okay. But the child deprivation side, you
24 don't know?

25 A. I -- again, I -- I don't recall ever

1 noticing anything other than the fact that we were
2 working with children in need.

3 Q. So the -- it's the families in the
4 Superior Court hearings that would be required to
5 pay \$500 into the court; is that right?

6 A. That is correct.

7 Q. Okay. Not from the juvenile court
8 hearings; right?

9 A. Correct.

10 Q. Okay. As far as you know, did anyone ever
11 object to having to pay that \$500?

12 A. I wouldn't have knowledge of that because
13 I rarely attended any of those hearings.

14 Q. Okay.

15 You never heard from anyone else that
16 anyone ever objected to having to pay the money; did
17 you?

18 A. I did not hear, and I would assume that
19 the judge would have, at that point, made a decision
20 as to whether or not to appoint a regular guardian
21 ad litem versus a CASA, GAL volunteer.

22 Q. Do you know if any of these families in
23 the Superior Court hearings ever questioned what the
24 purpose of the \$500 is?

25 A. I have no idea.

1 Q. Okay.

2 For expense reimbursements, Clayton County
3 does not permit county funds to be used to purchase
4 alcohol; is that correct?

5 MR. MEW: Object to form. Go ahead.

6 THE WITNESS: That's correct.

7 BY MR. HILL:

8 Q. And when you worked there, you never had
9 alcohol served at a reception or a party or event on
10 county government property; did you?

11 A. No, I did not. But I do recall a
12 conference in Puerto Rico. And after a full-day
13 session, Teske had invited the Clayton County
14 employees to the bar and -- before dinner for some
15 beverages -- alcoholic beverages.

16 And when we were ready to leave that
17 location to go to dinner, everyone pulled out their
18 wallets to pay. And he said, no, I've got this.
19 We're putting this on the Casey Foundation Grant.

20 Q. What is the Casey Foundation Grant?

21 A. I don't even know. It was monies that -- I
22 think federal monies that came into the court for
23 the delinquency side.

24 Q. Okay.

25 A. Annie E. Casey, I believe is the name.

1 Q. Anyone else heard him say this?

2 A. I would imagine. There were several of us
3 sitting at the bar.

4 Q. Who else was sitting there?

5 A. I remember Annell Graniela at the time. I
6 believe her married name now is Hudson. And I want
7 to say possibly Sheryl Teske was present.

8 Q. Anybody else you can recall being there?

9 A. Not that I can recall right in this
10 moment.

11 Q. If a county employee had turned in an
12 expense report to you requesting a reimbursement
13 that included alcohol with a meal, that would be
14 denied; wouldn't it?

15 MR. MEW: Object to form.

16 THE WITNESS: Not necessarily.

17 BY MR. HILL:

18 Q. Okay. Under what circumstances would it be
19 denied?

20 A. If the reimbursement was -- request was
21 for something related to recruitment, training, or
22 retention of a volunteer, based on the Memorandum of
23 Understanding, I could reimburse through the GAL
24 account.

25 Q. Okay. Could you reimburse alcohol from any

1 other source of money?

2 A. No.

3 Q. Okay. The Friends of Clayton County CASA
4 was set up in 2003; is that right?

5 A. When I started with the county in January
6 of 2003, there was an advisory board. I do not
7 believe it was referenced as the Friends of Clayton
8 County CASA.

9 Q. Okay.

10 A. But some of my first actions dealing with
11 the advisory board was they were already in progress
12 towards developing their 501(c)(3). David Wall was
13 the board chair -- or the -- or the chair of the
14 advisory committee at that time.

15 And we had several meetings with
16 Judge Banke and even some judges at the Superior
17 Court regarding the desire of that advisory
18 committee to become a non-profit.

19 Q. Okay.

20 So before 2003, there was an advisory
21 board that was like a less formal -- just in a less
22 formal capacity; is that right?

23 A. Yes.

24 Q. Okay. So it wasn't like -- it was not a
25 501(c)(3) before that; is that right?

1 MR. MEW: Object to form.

2 THE WITNESS: That is correct.

3 BY MR. HILL:

4 Q. Okay. So were you involved in setting up
5 the Friends of Clayton County CASA, Inc.?

6 A. My presence was more informational as it
7 related to the CASA Program of juvenile court.
8 Again, David Wall led the charge. He was, at the
9 time, the Chief of the Morrow Fire Department.

10 Q. Okay. And he was on that advisory board?

11 A. That is correct.

12 Q. Okay.

13 I can show you what I'm marking as
14 Defendant's Exhibit 1. The Friends of Clayton County
15 CASA Articles of Incorporation. Have you seen this
16 before?

17 A. Yes, I have.

18 (Exhibit Number 1 marked for
19 identification.)

20 BY MR. HILL:

21 Q. Were you involved in drafting this at all?

22 A. No, I was not.

23 Q. Okay.

24 Under -- I'll direct your attention to
25 under Article 3 where it says that, "The purpose of

1 the Friends of Clayton County CASA would be to
2 provide ongoing support to the Clayton County CASA
3 Program Director, increase public awareness of the
4 program, help recruit volunteers, raise funds, and
5 assist with volunteer recognition."

6 Do you see where I'm talking about?

7 A. Yes, I do.

8 Q. Where it says Clayton County CASA Program
9 Director, by A, is -- would that be referring to
10 your position?

11 A. I believe that was the intent, yes.

12 Q. Okay.

13 And the -- in that itemized list,
14 lowercase b, "Increase public awareness of the
15 program," would that -- your understanding that
16 would include telling people about the good work
17 Clayton County CASA does; right?

18 MR. MEW: Object to form.

19 THE WITNESS: Yes, among other things.

20 BY MR. HILL:

21 Q. Would it include advertising?

22 A. Yes.

23 Q. Anything else you think that would
24 include?

25 A. It would include speaking engagements,

1 county-wide events. For example, Chamber of
2 Commerce. And of course, the Darlin' Duck Derby was
3 their biggest public awareness event that they --
4 they held annually.

5 Q. And for this deposition, when I say, like,
6 FCCC, you know that means Friends of Clayton County
7 CASA; right?

8 A. Correct.

9 Q. Okay. And so FCCC also raises funds;
10 correct?

11 A. They did.

12 Q. They did.

13 And your understanding is FCCC would raise
14 funds to spend on CASA-related activities; is that
15 right?

16 A. Correct.

17 Q. And one fundraiser you mentioned is the
18 Darlin' Duck Derby?

19 A. That is correct.

20 Q. And that's an FCCC function; is that
21 right?

22 A. I don't know that I would necessarily
23 define it solely as an FCC (sic) function because it
24 was also a CASA function, as well. But --

25 Q. What -- can you give me, like, a

1 comprehensive list of all the fundraisers? Besides
2 Duck -- Duck Derby being one, what would be some of
3 the others?

4 A. An example might be where a board member
5 might have a connection with a certain company --

6 Q. Mm-hmm.

7 A. -- and speak to that representative and
8 provide awareness about CASA and what CASA does. And
9 then may, perhaps, speak to them about sponsorship
10 opportunities or donation opportunities.

11 Q. So like, donations from individuals?

12 A. Correct.

13 Q. You mentioned a Soup and Quackers event;
14 right?

15 A. That is correct.

16 Q. Were there -- were there any other, like,
17 regular events that FCCC would put on as
18 fundraisers?

19 A. Well, there was the Counting of the Flock
20 --

21 Q. Okay.

22 A. -- which was a week prior to the Darlin'
23 Duck Derby. Because the ducks had to be sorted and
24 counted and verified that all the numbers were
25 legible and that sort of thing.

1 There was the Duckoration Tour. All of the
2 sponsors that came in at a certain level would
3 receive a large rubber duck to decorate, or as they
4 called it, Duckorate.

5 And then those ducks would -- they would
6 go on tour throughout the county and the areas
7 around the county. And then there was what was known
8 as the V.I.D., Very Important Duck party. Obviously,
9 everything duck-themed.

10 But that was an appreciation event for all
11 of the sponsors and the volunteers that had
12 contributed to pulling off the Duck Derby itself.

13 Q. Okay. So any of these events could result
14 in raising funds; is that right?

15 A. That is correct.

16 Q. Any other events to include on this list?

17 A. Yes, I had a subgroup of volunteers that
18 were referred to as the ABCs --

19 Q. Okay.

20 A. -- which stands for Ambassadors Behind
21 CASA. And the FCCC would help the Ambassadors Behind
22 CASA with toy drives.

23 Those events would get toys, and quite
24 often, monies raised primarily for our children in
25 relative care. But oftentimes, there might be a DFCS

1 child that there was no money left from the State to
2 provide that child Christmas, so then the
3 ambassadors would step in.

4 We also had another subgroup of volunteers
5 known as the CASA Guardians. It was primarily an
6 attempt to increase male volunteers and maybe -- not
7 so much to go through the training and to actually
8 represent a child in the court system but to just
9 support the program similar to the ABCs.

10 And it was shadowed after a program, I
11 believe, in -- in Kentucky where they created a
12 group known as the CASA Quarterbacks. And it was
13 primarily, like, the husbands of the -- of the wives
14 that were CASA volunteers in that program.

15 It was a chance for them to get together.
16 And then they would do things -- mentoring-type
17 projects with some of the kids at that program or
18 service. So we -- we would try to raise money and
19 funds for that group.

20 It wasn't nearly as successful as we had
21 hoped, but they had the use of an old Dodge Dually
22 that was known as The Duck Truck. And it had a real
23 -- a painting on both sides of the truck of, like, a
24 duck running -- charging down the street. And that
25 vehicle would be used to help us with public

1 awareness and to show up at events.

2 Q. Any other fundraisers?

3 A. Not that I can recall other than what
4 we've discussed.

5 Q. Okay. So would -- money raised from the
6 ABCs toy drive, would that go into the ABCs'
7 account?

8 A. That is correct.

9 Q. And so would -- all of these others that
10 we mentioned, would money raised from those -- would
11 money raised from those functions go into the FCCC
12 board account?

13 A. Correct.

14 MR. MEW: Object to form.

15 BY MR. HILL:

16 Q. Okay. And will -- might be helpful to just
17 go ahead and define the accounts.

18 So there's -- my understanding, there's a
19 -- a universe of, like, three accounts, kind of, at
20 issue with the -- the FCCC. You've got the one
21 account for the Ambassadors Behind CASA; right?

22 A. Correct.

23 Q. And then you've got one account that was
24 sourced by the \$500 that families would pay in --
25 families in the Superior Court hearings would pay

1 into the court; right?

2 A. Correct.

3 Q. Okay. And we can call that one the GAL
4 account; right?

5 A. Yes.

6 Q. Right. Okay.

7 And then there's a -- a third one that
8 would be what I was calling the FCCC board account,
9 which would be sourced by the fundraising at these
10 functions; right?

11 A. Correct.

12 Q. Okay.

13 Did the -- the FCCC board account have any
14 other source of funds beyond money raised through
15 these fundraisers or individual donations, as far as
16 you know?

17 A. Not that I'm aware of, no.

18 Q. Okay.

19 And the G -- the GAL account was only
20 sourced by those \$500 payments for the families in
21 Superior Court; right?

22 A. Correct.

23 Q. Okay.

24 So the -- the FCCC would not give money
25 directly to the GAL account from fundraising; would

1 it?

2 MR. MEW: Object to form.

3 THE WITNESS: No, not that I would be
4 aware of.

5 BY MR. HILL:

6 Q. Okay. The FCCC never gave money directly
7 to Clayton County, to your knowledge; did it?

8 MR. MEW: Same objection.

9 THE WITNESS: Well, initially -- and the
10 primary reason that the -- the advisory board
11 shifted to a non-profit 501(c)(3) is that all
12 funds they initially made for those years --

13 BY MR. HILL:

14 Q. Mm-hmm.

15 A. -- prior to me coming in would be
16 deposited into the Clayton County account.

17 Q. Okay.

18 A. I'm assuming a juvenile court. And I'm not
19 an accountant, but my understanding, whatever the
20 budget term is at the end of the fiscal year if the
21 funds were not used --

22 Q. Mm-hmm.

23 A. -- they got absorbed into the Clayton
24 County budget. And the advisory board, even though
25 at the time the Darlin' Duck Derby did exist, it was

1 on a much smaller scale.

2 Q. Mm-hmm.

3 A. They became frustrated that their hard
4 work each year raising funds would disappear if they
5 couldn't use them fast enough.

6 Q. Okay.

7 A. So in -- in that light, they ended up
8 having lost money to the county. Not by choice, but
9 --

10 Q. Okay.

11 But that didn't happen anymore after 2003
12 when FCCC was formed as a 501(c)(3); right?

13 MR. MEW: Object to form.

14 THE WITNESS: I don't recall exactly when
15 the -- the articles or whatever -- the -- the
16 paperwork was actually finalized for the board.

17 BY MR. HILL:

18 Q. Okay.

19 Well, so to restate the question, whether
20 it's 2003 or not, after the articles of
21 incorporation were set into place and FCCC was a
22 corporation -- after that point, it was no longer
23 depositing money into the county's account; right?

24 MR. MEW: Same objection.

25 BY MR. HILL:

1 Q. As far as you know?

2 A. That's my understanding.

3 Q. Okay. And so FCCC, the money it raises, it
4 keeps in communes for its own purposes; right?

5 A. Correct.

6 Q. Okay.

7 And the county has no oversight over -- or
8 control over the money that the FCCC raises; right?

9 MR. MEW: Object to form.

10 THE WITNESS: Correct. After the articles
11 of incorporation were established.

12 BY MR. HILL:

13 Q. Right.

14 And so the FCCC board would be the group
15 of people who are in charge of the money that the
16 FCCC raises; right?

17 MR. MEW: Same objection.

18 THE WITNESS: That is correct.

19 BY MR. HILL:

20 Q. Okay.

21 Like you would not be the person to decide
22 how they spend their money; right? When you worked
23 there? The county?

24 MR. MEW: Object to form.

25 THE WITNESS: No, but they would sometimes

1 ask my opinion or ask for advice.

2 BY MR. HILL:

3 Q. Okay.

4 So you could give advice, but they would
5 -- the board would make the decision on how to spend
6 FCCC money; right?

7 A. That is correct.

8 Q. Okay. And you did not work for FCCC?

9 A. No, I did not.

10 Q. Okay.

11 MR. MEW: Could we go off the record for
12 one brief moment?

13 MR. HILL: Yeah.

14 MR. MEW: Hey, do what you got to do.

15 THE COURT REPORTER: We are still on the
16 video.

17 MR. MEW: Oh, sorry.

18 THE VIDEOGRAPHER: The time is 12:20. We
19 are going off the video record.

20 (A break was taken.)

21 THE VIDEOGRAPHER: The time is 12:21. We
22 are back on the video record.

23 BY MR. HILL:

24 Q. All right.

25 Mr. Bostock, I'm showing you what I'm

1 marking as Defendant's Exhibit 2, which is a
2 document entitled, "Bylaws of Friends of Clayton
3 County CASA Inc." Bates-stamped Clayton-371 through
4 377.

5 Have you seen these before?

6 A. Yes, I have.

7 (Exhibit Number 2 marked for
8 identification.)

9 BY MR. HILL:

10 Q. Were you involved in drafting these
11 bylaws?

12 A. No, I was not.

13 Q. Okay. Do you know who did draft them?

14 A. I do not know for sure. I'm assuming David
15 Wall played a major part. They also had contracted,
16 I believe, with an attorney that was involved.

17 Q. Okay.

18 And if you see on the first page, under
19 Article 2, Section 1, "Purpose and Mission," it
20 looks like it lists a lot of the same things as in
21 the articles of incorporation regarding purpose,
22 including, I think if you look right in the middle
23 of that paragraph -- I'm sorry.

24 Yeah. "The purpose and mission of the FCCC
25 board will be to provide ongoing support to the

1 program director of the Clayton County CASA
2 organization, increase public awareness of the
3 program, help recruit volunteers, raise funds, and
4 assist with volunteer recognition."

5 You see that part where I'm reading?

6 A. Yes, I do.

7 Q. Okay.

8 And then it goes on to say that, "The
9 purpose of Clayton -- of the Clayton County CASA
10 Program is to provide trained, screened, and
11 supervised volunteers to advocate for the best
12 interest of children involved in deprivation
13 hearings in Clayton County, and make recommendations
14 to the judge."

15 Do you see where I'm reading there?

16 A. Yes, I do.

17 Q. So the FCCC bylaws do not say that the
18 Clayton County CASA Program is intended to engage in
19 any fundraising; does it?

20 MR. MEW: Object to form.

21 THE WITNESS: Well, I read it as
22 supporting the program with awareness,
23 recruitment, raise funds, and assist with
24 volunteer recognition.

25 BY MR. HILL:

1 Q. Okay.

2 But that's talking about the purpose and
3 mission of the FCCC board where you just read from;
4 correct?

5 A. Correct.

6 Q. Okay.

7 But just when it spells out the purpose of
8 the Clayton County CASA Program, it does not use
9 that term raise funds; does it?

10 A. No, it does not.

11 Q. And nor does it say that the Clayton
12 County CASA Program is intended to raise public
13 awareness or engage in any advertising; does it?

14 MR. MEW: Object to form.

15 THE WITNESS: No, it does not. But in
16 order to provide the trained, screened, and
17 supervised volunteers, you have to have
18 recruitment, training, and retention.

19 BY MR. HILL:

20 Q. But that's your understanding; right?

21 A. Yes, and these are the purpose and mission
22 as outlined by FCCC that was signed on October of
23 2003.

24 Q. Mm-hmm. If you could turn to Page 6, which
25 is Bates-stamped Clayton-376. Under Section 2,

GERALD BOSTOCK
BOSTOCK V. CLAYTON COUNTY

October 14, 2021
107

1 "Checks," kind of at the top of the page; do you see
2 that?

3 A. Yes, I do.

4 Q. Okay.

5 Where it's saying that, "Checks, drafts,
6 and other demands for money shall be signed by the
7 chairperson or treasurer," and you see where it says
8 that the chairperson and the treasure, either one,
9 can sign checks for under \$500, but two signatures
10 are required for checks in excess of \$500; do you
11 see that?

12 A. Yes, I do.

13 Q. Okay.

14 And just to make it clear on the record,
15 you were never the chairperson or the treasurer for
16 FCCC; correct?

17 A. That is correct.

18 Q. And the chairperson or treasurer did not
19 ever make you, like, their agent for signing checks
20 for FCCC; correct?

21 MR. MEW: Object to form.

22 THE WITNESS: Again, this document was
23 created in 2003 --

24 MR. HILL: Right.

25 THE WITNESS: -- prior to the GAL monies

1 started coming to the FCCC. And at that time,
2 they did designate me after a period of time. I
3 didn't start out initially.

4 But prior to my termination, yes, I was
5 directed by the FCCC to have spending authority
6 over those GAL monies with their oversight.

7 BY MR. HILL:

8 Q. But not over the FCCC board monies; right?

9 MR. MEW: Object to form.

10 THE WITNESS: Correct.

11 BY MR. HILL:

12 Q. Okay.

13 A. And if I can go back. I mean, those were
14 considered FCCC monies that came in through the GAL
15 account and then housed in that separate account.

16 Q. Who -- when you say they were considered,
17 who considered them that?

18 A. Well, according to the MOU and the board.

19 Q. The board considered the GAL funds to be
20 their monies?

21 A. Yes.

22 Q. You were at Ms. Crawford's deposition;
23 weren't you?

24 A. I was.

25 Q. Do you recall when she testified that the

1 board did not have oversight over the GAL account?

2 MR. MEW: Object to form.

3 THE WITNESS: I don't recall specifically
4 what she said. But again, the understanding of
5 the MOU and when those monies started coming in
6 as directed by that MOU to the FCCC, that was
7 the decision made by the officers of the board.

8 BY MR. HILL:

9 Q. I'll show you what I'm going to mark as
10 Defendant's Exhibit 3. I'll represent to you --
11 actually, this was submitted during Ms. Crawford's
12 deposition -- or part of it was. I'll represent to
13 you this is a statement she gave to the District
14 Attorney in 2015.

15 A. Mm-hmm.

16 (Exhibit Number 3 marked for
17 identification.)

18 BY MR. HILL:

19 Q. If I could direct your attention to the
20 first page of her statement, which is Bates-stamped
21 Clayton-13914. It's about the third page of this
22 packet.

23 And if you see this last sentence in the
24 first full paragraph -- the last three sentences --
25 sorry -- where -- actually, I'll just read the last,

GERALD BOSTOCK
BOSTOCK V. CLAYTON COUNTY

October 14, 2021
110

1 it looks like, four or five.

2 "Gerald made the board aware that he was
3 going to sponsor his softball team. In return, the
4 players, at least some, were willing to assist with
5 ticket sales and/or sponsorships.

6 He said that CASA would be printed on the
7 back of the shirts. He stated that the sponsorship
8 was being paid with GAL funds. The board did not
9 have to vote for this action. It was not FCCC board
10 money."

11 Do you see that?

12 A. I do.

13 Q. Okay.

14 But it's your contention in the philosophy
15 that the GAL account was actually FCCC board money?

16 MR. MEW: Object to form.

17 THE WITNESS: Yes, most certainly. And I'm
18 not questioning her memory. This was dated
19 February 11th of 2015. That -- that money, per
20 the memo -- the MOU, was directed to be given
21 to the FCCC.

22 The board was left out of the process of
23 developing that MOU --

24 BY MR. HILL:

25 Q. Mm-hmm.

1 A. -- and the original draft actually had
2 Sabrina Crawford's name on it. And Teske had it
3 removed.

4 Again, when that money started coming into
5 the account, I was going through the treasurer
6 initially with any reimbursements for expenditures.
7 So they were providing oversight, and they continued
8 to provide oversight even once they established that
9 they would give me the spending authority with that
10 money.

11 BY MR. HILL:

12 Q. I'm not going to mark this as an exhibit.
13 I just want to show you some portions of
14 Ms. Crawford's deposition testimony where I know you
15 were present. If you could look at Page 44 of her
16 deposition.

17 And there's this -- this exchange where
18 Ms. Crawford is, again, saying, "He," you know,
19 referring to you, "did state that the softball team,
20 the sponsorship, was covered by the GAL money -- or
21 it was -- I don't know if covered is the right word,
22 but there was money used for the softball team, and
23 I was aware. And I said, yes, I was.

24 And he said," and she -- she's talking
25 about Judge Teske here, "Why would you do that?" I

1 said," Sabrina Crawford talking, "Well, we don't
2 approve that. We were just aware.

3 And I don't disagree with it. I don't
4 recall anybody on the board thinking that it was a
5 bad idea. Not that it was our authority to state if
6 it was misuse of funds, but the money wasn't the
7 Friends of Clayton County CASA board money."

8 Do you see that part that I'm reading
9 from?

10 A. I do.

11 Q. And I mean, it continues. Just to point
12 out the next page, Page 45, starting at Line 3. "So
13 for him to have said the softball team or brought up
14 the softball team, and it was, you know, Gerald had
15 made the decision to sponsor the softball team and
16 was I aware. I said I was. And we didn't see
17 anything wrong with it, although it wasn't our
18 approval."

19 And then if you look down at Page 48,
20 starting at Page -- at Line 9. "All right. Now, when
21 Teske was instructing Gerald to pick up the bar tab,
22 was he telling him to pick it up using CASA funds?"
23 That's the question.

24 Ms. Crawford answers, "It wasn't -- well,
25 not the Friends of Clayton County CASA funds."

1 "Okay." And then she goes on, "But it
2 would have been CASA funds."

3 And just if you could turn to Page 110 of
4 her deposition, Line 21, where she is asked, "What
5 about the GAL account?"

6 And Ms. Crawford says, "That was through
7 the courts. So we did not vote on or take in that
8 money or make the decisions on how that money was
9 spent."

10 Just one final one on Page 112, starting
11 at Line 9. "Well, one thing" -- she's asked the
12 question, "Well, one thing that I'm kind of confused
13 by is you're saying the board had no control over
14 the GAL account; right?"

15 And Ms. Crawford answers, "We did not vote
16 on those funds and how they were spent."

17 So I know that you're saying that you
18 interpret the MOU as giving -- as the GAL account
19 being under the control of the FCCC board, but do
20 you have an explanation for why Ms. Crawford -- who
21 was the chair of the FCCC board. She seems to be
22 really positive that the board did not have control
23 over the GAL account?

24 MR. MEW: Object to the form.

25 BY MR. HILL:

1 Q. Do you have -- maybe you don't have, but
2 do you have an explanation for why she -- her
3 understanding is so different from yours?

4 MR. MEW: Same objection.

5 THE WITNESS: Again, I can't speak to her
6 memory. We're in -- this was 2021, but I do
7 remember clearly that the board was excluded
8 and I -- from the conversations initially.

9 But when it was presented, because it was
10 their bank account that those monies were going
11 into, again, the treasurer at the time, Jane
12 Glaze, was the board member authorizing checks
13 to cover reimbursements for expenditures from
14 that account and was reviewing those
15 expenditures.

16 So that's my explanation is that you --
17 you would have to ask her if she was confused
18 or doesn't remember correctly.

19 MR. HILL: Okay. Do you want to take a
20 lunch break?

21 MR. MEW: Sure.

22 MR. HILL: Okay. Let's go off the record.

23 THE VIDEOGRAPHER: The time is 12:36. We
24 are going off the video record.

25 (A break was taken.)

1 THE VIDEOGRAPHER: The time is 1:23. We
2 are back on the video record.

3 BY MR. HILL:

4 Q. Mr. Bostock, you understand you're still
5 under oath; correct?

6 A. Yes.

7 Q. All right. All right.

8 Let me show you what I'm marking as
9 Defendant's Exhibit 4. All right.

10 This is a document titled, "Memorandum of
11 Understanding." Bates stamped Clayton-232 through
12 239. This is the MOU that you've referred to a
13 couple of times today; correct?

14 A. (No audible response.)

15 Q. Let me scratch that question and restate
16 it.

17 This is the MOU that was in effect during
18 your employment at Clayton County; correct?

19 A. It appears to be, yes.

20 (Exhibit Number 4 marked for
21 identification.)

22 BY MR. HILL:

23 Q. Okay.

24 You mentioned earlier that there was
25 another draft that had Sabrina Crawford's name on

GERALD BOSTOCK
BOSTOCK V. CLAYTON COUNTY

October 14, 2021
116

1 it; is that right?

2 A. That is correct.

3 Q. How do you know about that other draft?

4 A. I know about that draft because it was an
5 intern of the CASA Program that did about ten weeks
6 of research talking to other CASA programs across
7 the country and then actually developed the draft of
8 the Memorandum of Understanding.

9 Q. Okay. Who was that intern?

10 A. His name was Craig Nuprid, N-U-P-R-I-D, I
11 believe, is how he spelled his last name. He was an
12 intern from Mercer Law School.

13 Q. Okay.

14 And so are you saying that he is the
15 person who drafted this MOU?

16 A. That is correct.

17 Q. Oh, okay.

18 This other draft that you referenced that
19 had Sabrina Crawford's name was that ever signed as
20 far as you know?

21 A. I don't believe so because, again, as I
22 recall, Teske had marked through her name.

23 Q. Okay.

24 Do you know of any other changes with that
25 original draft and this one just based on your

1 recollection?

2 A. None that I can recall.

3 Q. Okay. So were you involved at all in
4 drafting this MOU?

5 A. I recall answering questions from Craig
6 during the development. And based on the research
7 that he had done across the country, he discussed
8 some of the findings that he came up with as he was
9 putting this together.

10 Q. Okay. And so this document is from 2007;
11 right?

12 A. I believe so.

13 Q. Okay.

14 A. Yes.

15 Q. And there was no MOU in place before this
16 one in December -- or November or December 2007;
17 right?

18 A. I assume this was the only one.

19 Q. Okay.

20 And so if you look at the signature page,
21 the very last page, it looks like this is a -- this
22 is an agreement between the Superior Court, Juvenile
23 Court, and the Clayton County CASA Program; is that
24 right?

25 MR. MEW: Object to form.

1 THE WITNESS: Yes.

2 BY MR. HILL:

3 Q. Okay. And the FCCC is not a party to the
4 MOU; correct?

5 MR. MEW: Object to form.

6 THE WITNESS: As stated, they were removed
7 from the signature -- signatory page, but they
8 -- during conversations and the decision that
9 the money would go to the FCCC, that would be
10 the extent of their involvement, to my
11 understanding.

12 BY MR. HILL:

13 Q. Okay. And Clayton County CASA is part of
14 Clayton County; is that correct?

15 A. That is correct.

16 Q. And so the Clayton County CASA employees
17 are Clayton County employees?

18 A. Correct.

19 Q. And this document this -- we've talked
20 about this a little bit, but this document describes
21 that the money source for what we've been calling
22 the GAL account is these \$500 assessments to the
23 parents in the Superior Court hearings; right?

24 A. Correct.

25 Q. Okay.

1 And that would be -- do you agree that's a
2 considerable amount of money for the families who
3 are being served?

4 MR. MEW: Object to form.

5 THE WITNESS: That was the decision of the
6 -- of the Superior Court Judge.

7 BY MR HILL:

8 Q. Oh, you mean the amount was the decision
9 of the Superior Court Judge?

10 A. As I recall.

11 Q. Okay.

12 If you could look at Page 2 at the top,
13 Section 2, "Administrative fee," that section. The
14 last sentence of that paragraph, under Section 2,
15 that first paragraph.

16 "If the \$500 administrative is not paid,
17 the CASA investigation will not commence until the
18 administrative fee is received." Do you see that?

19 A. I do.

20 Q. Is that -- when you worked there; is that
21 correct? If the parents did not pay the \$500, then
22 there would no -- would not be a CASA assigned; is
23 that correct? Like, is that how it worked in
24 practice?

25 A. Yes.

GERALD BOSTOCK
BOSTOCK V. CLAYTON COUNTY

October 14, 2021
120

1 Q. Okay.

2 But there wasn't like a procedure by which
3 the parents could show that they're too poor to pay
4 the fee and get out of it.

5 MR. MEW: Object to form.

6 BY MR. HILL:

7 Q. Was there?

8 A. Not that I'm aware of, no.

9 Q. Okay.

10 And the purpose of the \$500, like we've
11 discussed, is to fund volunteer recruitment,
12 training, and retention; correct?

13 A. Yes, as stated in the document.

14 Q. Right.

15 And so just to kind of go into each of
16 those terms. So recruiting volunteers, that means
17 recruiting someone to volunteer their time to become
18 a CASA volunteer; is that right?

19 MR. MEW: Object to form.

20 THE WITNESS: It could include that. It
21 could also include other services that might
22 benefit the CASA Program.

23 BY MR. HILL:

24 Q. What other services could it include?

25 A. It could include in-kind services, for

1 example, for the Duck Derby, or it could also
2 include recruitment of sponsorships and donors.

3 Q. Your interpretation of that, where does
4 that come from?

5 A. My years of volunteer management and
6 experience and with the understanding that
7 recruitment is a relationship-building process.

8 Q. A relationship-building process with whom?

9 A. With a potential volunteer. With a
10 potential donor or sponsor or even an existing
11 volunteer, donor, or sponsor.

12 Q. Okay. This document does not talk about
13 donors or sponsors; does it?

14 MR. MEW: Object to form.

15 THE WITNESS: It references recruitment,
16 training, and retention.

17 BY MR. HILL:

18 Q. Volunteer -- just to be clear, it does
19 actually say, "Volunteer recruitment, training, and
20 retention." Correct?

21 MR. MEW: Same objection.

22 THE WITNESS: Yes, it does, but I would
23 consider those other individuals in the
24 volunteer category.

25 BY MR. HILL:

1 Q. Okay.

2 This next section beneath it, Section 3,
3 it's the, "Role and responsibility of a CASA
4 volunteer." Do you see that?

5 A. I do.

6 Q. This section looks like a fairly detailed
7 discussion of what a CASA volunteer does; is that
8 right?

9 MR. MEW: Object to form.

10 THE WITNESS: Yes, it appears to be pretty
11 thorough.

12 BY MR. HILL:

13 Q. And this Section 3, "Role and
14 responsibility of a CASA volunteer," does not say
15 anything about Duck Derby or any other fundraising
16 events; does it?

17 MR. MEW: Object to form.

18 THE WITNESS: No, it outlines more so of
19 the core process.

20 BY MR. HILL:

21 Q. Okay.

22 So when this document talks about
23 volunteers, the only volunteers discussed in this
24 document are the court-appointed special advocates;
25 right?

1 MR. MEW: Objection to form.

2 THE WITNESS: I'm not sure I understand
3 your question.

4 BY MR. HILL:

5 Q. Well, I understand that someone could be a
6 volunteer at the Duck Derby, for instance. That's an
7 example of a volunteer; right?

8 A. Correct.

9 Q. Okay. Someone could be a volunteer at like
10 a 5K, and they give out water to participants;
11 right?

12 A. Correct.

13 Q. Okay.

14 Someone could also be a volunteer in the
15 CASA Program and undergo the training and serve as a
16 CASA for a child in need; right?

17 A. Correct.

18 Q. Okay.

19 So in this universe of people that we can
20 call volunteers, the only ones the MOU talks about
21 are the CASA volunteers; right?

22 MR. MEW: Same objection.

23 THE WITNESS: It refers to the primary
24 role of the CASA GALs, but our CASA GALs were
25 never required to go beyond the scope of what

1 they were expected to do in court.

2 BY MR. HILL:

3 Q. Okay.

4 And the MOU doesn't say anything about
5 them going beyond this scope; right?

6 A. It does not address that, no.

7 Q. Okay.

8 So before 2007, before this MOU was in
9 effect, the court did not assess any fees to the
10 parents in the Superior Court hearings for CASAs; is
11 that right?

12 A. It was not until this MOU was in place
13 that we began providing services with Superior
14 Court.

15 Q. Okay. So what was the -- how was it set up
16 before the MOU came into effect?

17 A. Before this MOU, the only volunteer
18 options that a person could choose from would be to
19 be a -- what we would consider a regular CASA
20 volunteer, working deprivation cases within Clayton
21 County Juvenile Court. They could volunteer with our
22 ABCs, the Ambassadors Behind CASA, or they could
23 volunteer to be one of the CASA guardians.

24 Q. Okay. Was there any recruitment, training,
25 or retention of CASA volunteers before 2007?

1 A. Yes.

2 MR. MEW: Object to form.

3 BY MR. HILL:

4 Q. Where -- where would that money have come
5 from before -- you know, when this \$500 wasn't being
6 assessed to the parents -- where would the money for
7 that recruitment, training, and retention come from?

8 A. A large percentage, I would say, would --
9 would have come from the FCCC. However, there might
10 have been some grant categories that would allow for
11 certain recruitment, training, or retention
12 activities.

13 Q. Okay.

14 And before the MOU was effective, the
15 parents in the Superior Court hearings would have to
16 pay the attorneys who served as guardians ad litem;
17 is that right?

18 A. That is my understanding, yes.

19 Q. And so the fee they would be paid, I
20 guess, would be paid -- I mean, would be -- would
21 depend on the attorney's hourly rate.

22 MR. MEW: Object to form.

23

24 BY MR. HILL:

25 Q. Is that your understanding?

1 A. I would imagine so, and yes.

2 Q. Usually, that would probably be -- that
3 total would probably be more expensive than the \$500
4 contemplated by this document?

5 MR. MEW: Same objection.

6 THE WITNESS: That would be my
7 understanding based on the conversations when
8 that \$500 amount was decided by the Superior
9 Court judges.

10 BY MR. HILL:

11 Q. Okay.

12 So is it fair to say that part of the idea
13 behind the MOU was to have a more cost-effective
14 system for getting advocates for the children you
15 serve?

16 MR. MEW: Object to the form.

17 THE WITNESS: I think the -- the value
18 that CASA brought to the courtroom is what led
19 the judges of Superior Court to sit down and
20 talk to us about creating this opportunity and
21 sort of jumpstarted.

22 BY MR. HILL:

23 Q. Okay.

24 The part of the idea, wasn't it also to
25 kind of save these parents some money? They only

1 have to pay \$500 instead of whatever the GAL
2 attorney was going to charge them?

3 MR. MEW: Same objection.

4 THE WITNESS: I recall there being
5 conversation that it -- it would, in some
6 cases, save the parents some money, but I also
7 remember in that conversation that the judges
8 felt that was a fair and reasonable amount for
9 the value that CASA brought into the courtroom.

10 BY MR. HILL:

11 Q. Okay. And the MOU did not govern any of
12 the money in the FCCC board account or the ABC
13 account; right?

14 A. My recollection is that when this document
15 was presented to the FCCC, they made the decision to
16 create the separate GAL account within the family of
17 accounts that the FCCC managed.

18 Q. Okay.

19 But the -- as far as your -- just your
20 understanding of the MOU, it doesn't have anything
21 to do with how -- how the FCCC spends the board
22 account funds; right?

23 MR. MEW: Object to form.

24 THE WITNESS: Well, they -- the board, as
25 I recall, wanted the money to be separate.

1 BY MR. HILL:

2 Q. Yeah.

3 A. So yes, this doctrine did -- document did
4 not govern their money that they brought in through
5 their fundraising efforts.

6 Q. Okay. And was it your -- well, was it your
7 idea to have the FCCC hold the money for the GAL
8 account?

9 A. The conversations that I was involved with
10 and present during with the juvenile -- with the
11 Superior Court judges, they specifically wanted the
12 money to go to the FCCC, and purposefully, wanted to
13 bypass county finance. Stating that it was -- the
14 money was to go to the FCCC board for use of or for
15 purposes of recruitment, training, and retention
16 with oversight by the board and not the county.

17 Q. Okay. Which Superior Court judges told you
18 that?

19 A. I had conversations with Judge Benefield
20 and with the judge that signed the document,
21 Judge Simmons.

22 Q. Okay.

23 Do you know -- do you know why the FCCC
24 kept the GAL funds in a separate account instead of
25 just adding it to its board account?

1 A. My belief is that, again, they were sort
2 of excluded in conversations and having Sabrina's
3 name, who was the chairman of the board at that
4 time, removed. And, again, initially, the treasurer
5 handled all reimbursements, and then the decision
6 was to hand that responsibility off to me.

7 Q. Wait, but I think you did say it was the
8 FCCC board that decided to have a separate account
9 for the GAL funds; right?

10 A. They did. They decided to --

11 Q. Okay.

12 A. -- put those monies separately.

13 Q. Do you know why they wanted to keep the
14 money separate?

15 A. I do not.

16 Q. Okay. Did you ever think about it?

17 MR. MEW: Object to form.

18 THE WITNESS: Not really, no.

19 BY MR. HILL:

20 Q. Did you ever believe that just having it
21 all in one account would make more sense instead of
22 having two separate accounts?

23 MR. MEW: Object to form.

24 THE WITNESS: I did not have control over
25 those decisions. That was board money, and they

1 made the decision on how those accounts would
2 be set up.

3 BY MR. HILL:

4 Q. Is it because the two accounts, the GAL
5 account and the board account, they have different
6 sources of money and different purposes of money?
7 Isn't that why they're separate accounts?

8 MR. MEW: Object to form.

9 THE WITNESS: I don't know that that is a
10 -- excuse me -- is a true statement. My belief
11 was that they just wanted to be able to, for
12 record-keeping purposes, have the money
13 separate.

14 BY MR. HILL:

15 Q. In the -- generally speaking, in the
16 relationship between Clayton County CASA and FCCC,
17 FCCC existed to support Clayton County CASA; is that
18 right?

19 A. Correct.

20 Q. Okay.

21 And so Clayton County CASA is like the
22 beneficiary of that relationship.

23 MR. MEW: Object to form.

24 BY MR. HILL:

25 Q. Right?

1 A. In some terms, yes.

2 Q. Okay. Clayton County CASA does not exist
3 to support FCCC; right?

4 A. Correct.

5 Q. Okay. And you had two debit cards; is that
6 correct? One for the GAL account and one for the
7 FCCC board account?

8 A. That is incorrect.

9 Q. That's incorrect? So you're saying you had
10 -- only had one debit card?

11 A. I was issued by the board the debit card
12 for the GAL --

13 Q. Okay.

14 A. -- account.

15 Q. And you didn't -- so you're saying you did
16 not have a debit card for the board account?

17 A. Not that I recall.

18 Q. Okay. You're aware that the auditors found
19 that you had two debit cards; right?

20 A. I'm not aware --

21 MR. MEW: Object to form.

22 THE WITNESS: -- of that.

23 BY MR. HILL:

24 Q. Okay.

25 Do you recall Sabrina Crawford testifying

GERALD BOSTOCK
BOSTOCK V. CLAYTON COUNTY

October 14, 2021
132

1 that you had a debit card for each of those accounts
2 -- those two accounts?

3 A. I do recall her statement.

4 Q. Okay. Do you have any idea why she felt
5 you had a debit card for the GAL account and the
6 board account?

7 MR. MEW: Object to form.

8 THE WITNESS: I don't know.

9 BY MR. HILL:

10 Q. Okay. Have you talked to Sabrina Crawford
11 since her deposition?

12 A. No, I have not.

13 Q. Okay. So you were not able to access the
14 FCCC board funds directly; were you?

15 A. No.

16 Q. So if you had wanted the FCCC board to pay
17 for something, you would have to have gone to them
18 for approval -- to the board for approval; right?

19 A. That is correct.

20 Q. Okay.

21 And according to the bylaws that we looked
22 out -- looked at earlier, for expenses above \$500,
23 you would have had to -- had to have gotten two
24 board member approvals; right?

25 A. Under which account?

1 Q. Oh, under the -- the FCCC bylaws, if you
2 had wanted the board to pay for something from the
3 board account and it cost more than \$500, that
4 required the approval of two board members; is that
5 right?

6 A. That is my understanding, yes.

7 Q. Okay. But there -- there were no controls
8 over expenditures like that for the GAL account;
9 were there?

10 MR. MEW: Object to form.

11 THE WITNESS: There was the same policy or
12 requirement that any check over \$500 would have
13 to have two signatures from the signature --
14 signatory card.

15 BY MR. HILL:

16 Q. There's not a document that says that for
17 the GAL account; is there?

18 A. I believe it stated it on the individual
19 checks.

20 Q. On the checks for the GAL account, it says
21 that?

22 A. I believe so.

23 Q. Okay.

24 But you were -- the board issued you a
25 debit card for the GAL account so that you would not

1 have -- so that you would not have to come to the
2 board directly for each expense you wanted to pay
3 for; is that right?

4 MR. MEW: Object to form.

5 THE WITNESS: My understanding was that
6 there was concern by them that I was having to
7 come out of pocket a lot of times and then wait
8 to be reimbursed. And then it became a
9 challenge for the board to keep up with the
10 reimbursements. And that's when the decision by
11 the board was made to have myself added.

12 And maybe that was when they created the
13 GAL account separate. But they -- that's the
14 point where I went and met Sabrina and a couple
15 of the other board members at the bank, and
16 they had my name added to the -- the card. And
17 specifically only the GAL account.

18 BY MR. HILL:

19 Q. No -- to your knowledge, no one else had a
20 debit card for the GAL account; right?

21 A. Not that I'm aware of.

22 Q. Okay. And the board would not have been
23 permitted to spend anything from the GAL account
24 without you approving it; would they?

25 MR. MEW: Object to form.

1 THE WITNESS: I don't recall any instance
2 where they came to me. I know there was an
3 issue at one of our functions where I was
4 instructed by Teske to use the card to cover
5 alcohol costs from individuals that had
6 attended the function, ordered their own
7 beverages from the bar, and then either forgot
8 or walked out and did not pay for them.

9 BY MR. HILL:

10 Q. Mm-hmm.

11 A. But as far as the board -- and I do
12 believe Ms. Crawford was aware of that. But outside
13 of that, I can't recall at this moment.

14 Q. You don't recall -- you don't know of an
15 instance where the board spent any money from the
16 GAL account that did not go through you; is that
17 what you're saying?

18 A. Again, I'm -- I'm -- my memory. I -- I'm
19 struggling with exactly when the GAL account was
20 established.

21 Q. Mm-hmm.

22 A. Because, again, I was going to the
23 treasurer. So during that time before that, I don't
24 know if the board may have spent money from that --

25 Q. Okay.

GERALD BOSTOCK
BOSTOCK V. CLAYTON COUNTY

October 14, 2021
136

1 A. -- those funds.

2 Q. But after you had a debit card, the board
3 never spent GAL account funds; right?

4 MR. MEW: Object to form.

5 THE WITNESS: Based on my memory, at this
6 point, no. They -- they did not come to me and
7 ask or that I'm aware of that they spent money,
8 no.

9 BY MR. HILL:

10 Q. Okay.

11 Now, I think Ms. Crawford testified that
12 she believed either the GAL account or the FCCC
13 board account could be used for any CASA-related
14 expense. Do you remember -- do you remember that?

15 A. If it aligned with this term in the MOU --

16 Q. Mm-hmm.

17 A. -- for GAL monies, volunteer recruitment,
18 training, and retention, she would be correct.

19 Q. Okay.

20 Did you believe that the GAL account and
21 the board account, either one could be -- that they
22 could be spent for the same purposes?

23 A. Yes.

24 Q. So if you needed to purchase something, it
25 would be more convenient to use the GAL debit card

GERALD BOSTOCK
BOSTOCK V. CLAYTON COUNTY

October 14, 2021
137

1 as opposed to going to the board for approval to get
2 money from the board account; right?

3 MR. MEW: Object to form.

4 THE WITNESS: Correct.

5 And if I can back up, as long as it
6 related to recruitment, training, and
7 retention.

8 BY MR. HILL:

9 Q. Okay.

10 Who decided -- you're the person who
11 decided if it related to recruitment, training, and
12 retention of volunteers; correct?

13 MR. MEW: Object --

14 BY MR. HILL:

15 Q. For the GAL account?

16 A. I felt like it was my responsibility most
17 of the time, yes. With board advice when I felt it
18 necessary.

19 Q. Okay.

20 But you did -- you did not have to get
21 board approval to spend money from the GAL account;
22 did you?

23 A. I did not --

24 MR. MEW: Object to form.

25 THE WITNESS: -- when they gave me the

1 authority to spend those funds for recruitment,
2 training, and retention.

3 BY MR. HILL:

4 Q. Okay.

5 So after that point, when the board gave
6 you that authority, you were the person who could
7 request money from the GAL account and approve the
8 expenditure and actually dispense the funds; right?

9 MR. MEW: Object to form.

10 THE WITNESS: If you break it down in
11 those steps.

12 BY MR. HILL:

13 Q. If I break it down into those steps, you
14 would be that person?

15 A. Yes.

16 Q. Okay. And you never saw anything wrong
17 with one person being in charge of all of those
18 steps?

19 MR. MEW: Object to form.

20 THE WITNESS: That was how it was decided
21 by the board.

22 BY MR. HILL:

23 Q. Okay.

24 Do you believe now, sitting here today,
25 that setting up an expense account that way could

1 provide an opportunity for wrongdoing?

2 MR. MEW: Object to form.

3 THE WITNESS: I suppose anything is
4 possible.

5 BY MR. HILL:

6 Q. Like if someone were an unscrupulous
7 person, they could abuse a setup like that for
8 personal gain; right?

9 MR. MEW: Object to form.

10 THE WITNESS: It's possible.

11 BY MR. HILL:

12 Q. So would you agree that it is vital or
13 extremely important that whoever is in that
14 three-part role of expense requester, approver, and
15 dispenser be someone who is a trustworthy
16 individual; right?

17 MR. MEW: Same objection.

18 THE WITNESS: Yes.

19 BY MR. HILL:

20 Q. Because if the person in charge of that
21 account is not trustworthy, they shouldn't be in
22 charge of the account; right?

23 MR. MEW: Same objection.

24 THE WITNESS: I suppose, yes, which is why
25 the -- the controls in place were that the bank

1 statements were being submitted to the
2 administration of the court every month. They
3 were being submitted and filed and presented at
4 each board meeting for review.

5 BY MR. HILL:

6 Q. The board members reviewed the GAL account
7 bank statements at each meeting?

8 A. They had the opportunity to review.

9 Q. Okay. Did they actually review them?

10 A. That I don't know. The books were always
11 made available.

12 Q. Okay. You attended the board meetings;
13 right?

14 A. I would probably say 99 percent.

15 Q. Okay.

16 Did they -- at the meetings you attended,
17 did the board ever review the GAL account bank
18 statements?

19 A. I remember occasionally having a -- a
20 question. Not about a particular expense, but how's
21 it looking? What's the account balance?

22 For a period of time, the board actually
23 had their own office space. And, again, the books
24 were actually kept there for a period. So they had
25 -- whether I was there or it was a board meeting,

1 they had access to the records at any given time.

2 Q. Okay.

3 We talked earlier about some of the
4 fundraising events. At one point, there was some
5 sort of, like, chicken biscuit sales at the
6 courthouse; is that right?

7 A. That -- that is correct.

8 Q. Okay. That was not like fundraising for
9 the FCCC board; right?

10 A. No, it was not.

11 Q. What -- what were the -- where did the --
12 what was the purpose of the chicken biscuit sales?

13 A. Well, it was a project actually sponsored
14 and presented by Chick-fil-A, which we had a very
15 close relationship with. And it was a project where
16 they would sell the biscuits to a charitable
17 organization at a reduced price. And then you could
18 sell the biscuits for whatever you wanted.

19 So staff had agreed it might be a good
20 idea just to have some -- some kind of, like, petty
21 cash, and we started selling the biscuits when --
22 before we moved to the new location.

23 The Citizen Panel Review, they started
24 observing and noticing. And we decided that if they
25 wanted to participate, that they could. And, again,

1 it was always just a small amount of money just for
2 miscellaneous.

3 And a lot of the intent was to allow the
4 Citizen Panel Review, when -- when she needed --
5 Ms. Cook, Concilia Chillumuna needed something for
6 her group of volunteers. She didn't have a whole lot
7 of funding sources. So there would be some petty
8 cash for -- that she would be able to access.

9 Q. Okay. So that chicken biscuit money did
10 not go to the GAL account?

11 A. No.

12 Q. Okay. It was just like a separate petty
13 cash account -- was there an account?

14 A. No.

15 Q. Okay. So just like separate petty cash
16 kept in the office?

17 A. Correct.

18 Q. Would you keep it in your office?

19 A. Yes.

20 Q. Okay. All of it, or did you split it up
21 with Ms. Chillumuna?

22 A. She and I had had multiple conversations
23 about sitting down and splitting the money. And, for
24 whatever reason, it never happened.

25 Q. Okay. But this was all -- this, the

1 chicken biscuit sales never occurred in the new
2 building; right?

3 A. No.

4 Q. Okay. I've seen some references to a men's
5 fashion show. Was that an FCCC fundraiser?

6 A. No, it was not.

7 Q. What -- was that a Georgia CASA event?

8 A. That is correct.

9 Q. So Georgia CASA is another separate
10 organization?

11 A. Correct. That's the state.

12 Q. Okay.

13 And so to make sure I get this right, is
14 the purpose of Georgia CASA to support individual
15 CASA programs throughout the state?

16 A. That is correct.

17 Q. Okay. So they would -- would they give
18 money directly to Clayton County CASA?

19 A. Yes, in the form of an allocation. And
20 it's my understanding that the majority of that
21 allocation through their CASA grant to the county
22 funded the majority of my position.

23 Q. Okay.

24 So they gave money to -- they allocated
25 money to Clayton County and also other CASA programs

1 throughout the state?

2 A. That is correct.

3 Q. Okay.

4 A. They -- they are members of National CASA.

5 Q. Okay.

6 A. And the national organization, along with
7 all the State organizations, CASA organizations,
8 they would actually go to Washington, D.C., every
9 year to speak on behalf of CASA programs and -- and
10 child abuse victims, and the need for CASA.

11 So they were creating federal dollars that
12 would come down that would be, in turn, allocated,
13 like you just mentioned. And then aside from that,
14 Georgia CASA, as a State organization, would also
15 hold their own fundraising events to support all the
16 programs, either through training or the Georgia
17 CASA conference every year.

18 Q. Okay. Was there also like a 5K that was a
19 CASA-related event?

20 A. That is correct.

21 Q. Was that Georgia CASA?

22 A. That was actually a Metro-collaborative
23 CASA effort, which again included Clayton, Cobb,
24 DeKalb, Fulton, and Gwinnett.

25 Q. Okay.

1 So is -- is -- is there a separate
2 organization called Metro Atlanta CASA?

3 A. It's not a separate organization. It was
4 just a group that was developed, and it developed
5 over time. Initially, the program directors or
6 coordinators got together casually on our own.

7 And finally, Georgia CASA stated to us
8 that all of you have been meeting on a regular basis
9 to support each other. What if we were able to
10 create a position at Georgia CASA and create a more
11 formal gathering, which then became the Metro CASA
12 Collaborative.

13 Q. Okay. So money raised from that 5K, where
14 would that money go?

15 A. I'm assuming at least part of it went to
16 cover the contract fees for the employee that
17 Georgia CASA hired to work with the collaborative.
18 But then that money would also go towards mutual
19 events, like training events, where Fulton may do a
20 day class of new volunteers, and Clayton would do
21 the evening class.

22 Q. Well -- well, who would hold the money?

23 A. Georgia CASA.

24 Q. Georgia CASA, okay.

25 And for the men's fashion show, funds

1 raised from that, that -- that would go to Georgia
2 CASA?

3 A. That was a Georgia CASA fundraiser. And
4 just to correct you, it wasn't a men's fashion show.

5 Q. Oh.

6 A. The event itself was known as the Georgia
7 CASA Luncheon and Fashion Show, which included male
8 models and female models on the runway.

9 Q. Oh, okay. I -- I -- I thought I saw in
10 e-mails reference to it being a male fashion show;
11 that's not correct?

12 A. No, that's not correct.

13 Q. Oh, okay.

14 I'll show you what I'm marking as
15 Defendant's Exhibit 5. And I'll represent these are
16 bank statements for the months in 2011 from the GAL
17 account.

18 MR. MEW: Month of what?

19 (Exhibit Number 5 marked for
20 identification.)

21 BY MR. HILL:

22 Q. All the months of 2011. The Bates numbers
23 are not sequential because I was trying to put them
24 in chronological order, so January through
25 December of 2011.

1 Is this -- the handwritten portions that
2 are on some of these pages, is that your
3 handwriting?

4 A. On some of these entries, yes.

5 BY MR. HILL:

6 Q. Okay. Oh, yeah, I see some that look
7 different.

8 On the first page, would that be your
9 handwriting on the first page?

10 A. That is correct.

11 Q. Okay.

12 MR. MEW: Michael?

13 MR. HILL: Yeah.

14 MR. MEW: Just for -- unless I'm missing a
15 page, I think for purposes of record, the last
16 one we have is the November statement. Am I
17 missing something? It's -- the Bates Number is
18 14034.

19 MR. HILL: Oh.

20 MR. MEW: Statement 12/07/2011.

21 MR. HILL: Yeah, I have one more page.

22 BY MR. HILL:

23 Q. Do you have -- Mr. Bostock, your last
24 page, is it 14034 or 14035?

25 MR. MEW: I have three -- I'm sorry,

GERALD BOSTOCK
BOSTOCK V. CLAYTON COUNTY

October 14, 2021
148

1 Michael. You were asking the witness. I'm
2 sorry.

3 THE WITNESS: I have 014035 as my last
4 page.

5 MR. HILL: Okay.

6 MR. MEW: Right, I have 35. I just didn't
7 know if it was -- because the dates that are
8 reflected on 35 appear to be --

9 MR. HILL: Oh, but at the very top, it
10 says 12/07/2011.

11 MR. MEW: Right, but I didn't know -- if
12 you -- if you look at the other statements,
13 they appear to be capturing the --

14 MR. HILL: Oh.

15 MR. MEW: -- trailing month up to the time
16 of the statement.

17 MR. HILL: Okay.

18 MR. MEW: So I didn't --

19 MR. HILL: Okay.

20 MR. MEW: -- know if there was -- yeah,
21 anyway.

22 MR. HILL: The could be --

23 MR. MEW: That's --

24 MR. HILL: -- the case.

25 MR. MEW: All right.

1 MR. HILL: Yeah.

2 BY MR. HILL:

3 Q. Okay.

4 Mr. Bostock, you don't have any reason to
5 believe that these are not accurate bank statements
6 for the GAL account for the months reflected; do
7 you?

8 A. No, I don't.

9 Q. Okay. Let me just ask you about some of
10 these. Like, on this very first page --

11 A. Mm-hmm.

12 Q. There is a couple of expenses. It looks
13 like ABC is preceding them. Like, I think it says,
14 "ABC appreciation drinks, and ABC lunch meeting, and
15 another ABC lunch meeting." Is that -- am I reading
16 those correctly?

17 A. I don't see ABC drinks, but --

18 Q. What is ABC appreciation? And then there's
19 a word that begins with a D; do you know what that
20 is?

21 A. I see ABC lunch meeting, ABC appreciation
22 dinner, ABC --

23 Q. Can --

24 A. -- lunch meeting.

25 Q. Sorry about that. Dinner, that's the word

1 that I'm talking about. Okay.

2 And then sponsor appreciation?

3 A. AMLI.

4 Q. AMLI? What is AMLI?

5 A. AMLI is an apartment residential company
6 headquartered in Atlanta.

7 Q. Okay. For the ones that say ABC, why --
8 why wouldn't these have been paid for out of the ABC
9 account?

10 A. The reason for the expenditures on the GAL
11 account would be it was appreciation and retention
12 efforts for all those hardworking Ambassadors Behind
13 CASA volunteers. So I, per the MOU understanding,
14 made those purchases.

15 If you notice the date range, it's during
16 the month of December. And that was the busiest
17 time, late November through December, where all of
18 our Ambassadors Behind CASA were out doing toy
19 drives. And so in an effort to retain those
20 volunteers, to keep them coming back every year,
21 money was spent to retain them.

22 Q. Okay.

23 But since, like, the Ambassadors Behind
24 CASA had its own account, why wouldn't -- is there a
25 reason why that money wouldn't have come out of the

1 Ambassadors Behind CASA account?

2 A. Because I wanted to make sure that money
3 was available for their use of either -- either
4 needing to purchase toys or items for the relative
5 caregivers, and to reward them and try to retain
6 them through other funds marked and designated as
7 such.

8 Q. Okay. And these were people who
9 volunteered to be an Ambassador Behind CASA?

10 A. Correct.

11 Q. Okay. But not to be a Clayton County CASA
12 volunteer?

13 A. I believe I had a few in that ambassador
14 group that did both --

15 Q. Okay.

16 A. -- which they had that ability to -- to
17 pick and choose. And -- but primarily, the majority
18 of my ABCs were -- were not trained CASA volunteers.

19 Q. Okay.

20 Do you know what the -- what looks like a
21 Verizon Wireless payment? Do you know what that is?

22 A. That would be for the -- at the time, the
23 netbooks that we were utilizing at the court. The
24 old court building did not have Wi-Fi.

25 And so we had discussed and made a

1 decision to purchase the netbooks so that staff
2 would have the ability to actually conduct work
3 while they were either waiting in court or between
4 hearings.

5 Q. So you --

6 A. So that would be the monthly payment, I
7 guess, for the --

8 Q. Okay. So -- and the one that says,
9 "Sponsor Appreciation AMLI," what had AMLI -- had
10 AMLI -- strike that.

11 Had AMLI donated money to the -- the
12 board?

13 A. No, AMLI had donated a computer for a
14 child we had. I can't recall if the child was in
15 foster care or if the child was in relative care in
16 custody.

17 Q. Okay. So it was appreciation to AMLI for
18 donating a computer to a child who was being served
19 by CASA?

20 A. That is correct. And Georgia CASA was
21 courting AMLI. It's my understanding AMLI chose a
22 charitable organization either every quarter or once
23 a year to support. And so Georgia CASA was courting
24 them, as well, for hopes that they would choose CASA
25 as an organization.

1 Q. Okay. So would the appreciation be, like,
2 courting a potential future sponsor, as well?

3 A. Correct.

4 Q. Okay. Would -- is there any reason why the
5 FCCC board should not have paid for that
6 appreciation?

7 A. It's possible they could have, as well as
8 the ABCs, but I don't recall.

9 Q. What do you not recall?

10 A. The reasoning that the GAL -- I mean, it
11 was - I was involved with the company, so --

12 Q. Okay. So since you had the relationship
13 with the company, that's why you paid for it with
14 the GAL funds?

15 A. Correct.

16 MR. MEW: Object to form.

17 BY MR. HILL:

18 Q. Could you turn to the third page, which
19 the Bates Stamp says Clayton-14076.

20 A. Okay.

21 Q. There's some Old Maguire's and a Chili's.
22 Do you know what these expenses were for?

23 A. It had to have been some type of
24 recruitment, training, or retention.

25 Q. What -- what -- is Old Maguire's a

1 restaurant?

2 A. It was. I don't know if it's still in
3 business.

4 Q. Okay.

5 When you say it would have been for some
6 recruitment, training, or retention, like, would you
7 -- recruiting a CASA volunteer, or would you be
8 recruiting someone to volunteer in some other
9 capacity?

10 A. We -- we did not recruit Maguire's, but I
11 do recall making an ask to have a -- an event there.

12 Q. Okay.

13 A. So we did meet with management of the
14 restaurant, I suppose, and I had some volunteers
15 with me.

16 Q. What type of event did you want to have
17 there?

18 A. I think it was going to be a volunteer
19 appreciation dinner, and they had, like, a banquet
20 hall.

21 Q. Okay. Chili's -- what about Chili's?

22 A. Chili's would be the same. They -- they
23 were a sponsor of us, and we did a lot of
24 activities. They generally hosted one of our Duck
25 Derby events. And so, therefore, if we were going to

1 do -- if I was going to meet with a potential
2 volunteer, I would definitely do that in an
3 establishment that was supporting --

4 Q. Mm-hmm.

5 A. -- our program.

6 Q. There was one -- there's a handwriting
7 that says, "CC payment to non-profit organization."
8 Is that your handwriting?

9 A. No, it's not.

10 Q. Do you know whose handwriting that is?

11 A. No, I do not.

12 Q. Is National Cakin -- is that -- I don't
13 know if I'm saying that right. National Cakin --
14 Cakin. Is that a non-profit organization?

15 A. I don't recall. It looks like it might be
16 the Kinship, but --

17 Q. Kinship? What's the Kinship?

18 A. That was a non-profit organization that
19 worked with relative caregivers, providing services
20 to the children and the relatives themselves.

21 Q. Do you know what this payment is for? It's
22 \$330 to -- possibly to the Kinship or National Cake
23 Inn. Do you know what that's for?

24 A. I don't recall.

25 Q. Okay. Do you know what this IKEA payment

1 was for? The \$15.10 to IKEA?

2 A. Best I can recall, it was for some type of
3 supply that we needed.

4 Q. Okay. But you don't know specific --
5 exactly what it is?

6 A. I don't recall.

7 Q. Okay.

8 So on the next page, which is
9 Bates-stamped Clayton-14075, it looks like more
10 restaurants, Flavors of Thai, Carrabba's, Chili's,
11 Dunkin' Donuts. Would -- did you ever take anyone to
12 a restaurant to try to talk them into becoming a
13 CASA volunteer?

14 A. Yes, that happened frequently.

15 Q. Okay. Is that what these were for?

16 A. Yes, I -- although, I think Flavors of
17 Thai or Thai Flavors -- I think that was volunteer
18 retention for some volunteers that were already in
19 the program.

20 Q. And so it would be volunteer retention by,
21 you know, just, like, paying for a meal to show that
22 you appreciate what they're doing, so hopefully
23 they'll stick around and keep volunteering; is that
24 the idea?

25 MR. MEW: Object to form.

1 THE WITNESS: Correct.

2 BY MR. MEW:

3 Q. Okay.

4 On any of the occasions when you did pay
5 for someone's meal, not for the purpose of retention
6 but for the purpose of trying to recruit them to
7 become a CASA volunteer, did that ever work?

8 A. I would certainly say yes.

9 Q. Can you think of anyone today who became a
10 CASA volunteer after taking them out to lunch or
11 dinner?

12 A. Not right off, I don't.

13 Q. Can you think of how many times that a
14 meal expense would have been for trying to recruit
15 someone to become a CASA volunteer?

16 MR. MEW: Object to form.

17 THE WITNESS: It would be hard to say
18 because it might -- would depend on whether or
19 not we were, like, in our Duck Derby planning
20 stages. Those expenditures might be more
21 closely related to recruitment of volunteers
22 for the event.

23 And then certainly, some retention efforts
24 to maintain those that were assisting for those
25 types of activities. So it just varies.

1 BY MR. HILL:

2 Q. Okay.

3 If you look at the next page, which is
4 stamped Clayton-14074. There's some expenses that
5 say, "Chicago." What -- what is -- what is the
6 Chicago trip?

7 A. I had attended a national CASA conference.

8 Q. Were -- were you the only person who
9 attended the national CASA conference?

10 A. From Clayton County?

11 Q. Oh, yeah. Yeah. Yeah, I don't mean like
12 the only person in the whole country. Were you the
13 only person from Clayton County CASA that attended?
14 Sorry.

15 A. To my recollection, yes.

16 Q. Okay. So how would that fit in with
17 volunteer recruitment, training, or retention?

18 A. Meetings to discuss and get ideas from
19 other CASA programs from around the country.

20 Q. To get ideas that --

21 A. About --

22 Q. -- for --

23 A. -- recruitment, training, and retention of
24 volunteers.

25 Q. Okay. Which one are we on? Could you turn

1 two more pages to the bottom? It'll say
2 Clayton-14068.

3 A. Okay.

4 Q. It says, "Cactus Car Wash expense." Do you
5 know what that is?

6 A. Yes, as stated on this document, I was in
7 the gold county vehicle and was needing to go to a
8 Georgia CASA-mandated meeting for all CASA programs
9 that they hold once or twice a year.

10 And the car had been due for service, and
11 so I took the vehicle in. And it had been normal
12 practice for the county, when they service the
13 vehicles, that the inmates would wash the vehicle.

14 Q. Mm-hmm.

15 A. And the -- the vehicle was horrible filthy
16 inside and out, and I could barely even see through
17 the windshield. And so I took the vehicle to the
18 carwash because I found out that the county was no
19 longer washing the vehicle as part of its servicing.
20 And I wasn't going to take the vehicle home and wash
21 it myself.

22 So in order to continue with recruitment,
23 training, and retention efforts, I needed to get to
24 and from safely.

25 Q. How does washing the car relate to

1 recruiting, training, or retaining volunteers?

2 A. It allowed me to get to the meeting so
3 that those topics could be discussed and I could
4 have information from Georgia CASA.

5 Q. What is Brasstown Valley? What is that?

6 A. That was a -- that's a place up in the --
7 the Foothills. And that was another Georgia CASA
8 meeting, I believe, or either it was a court
9 improvement meeting that I attended.

10 Q. Did anyone else from Clayton County CASA
11 attend?

12 A. I believe Judge Butler may have gone, and
13 I'm not sure if Concilia Chilumuna had attended.

14 Q. Okay.

15 And is -- the way that this would relate
16 to volunteer recruitment, training, retention is
17 that you would get ideas from there that you could
18 come back and implement --

19 A. Yes.

20 Q. -- at Clayton County --

21 A. Specifically for training.

22 MR. MEW: Make sure --

23 MR. HILL: Okay.

24 MR. MEW: Just again, make sure you let

25 Mr. Hill finish this question, so we have a

1 good record.

2 THE WITNESS: I apologize.

3 BY MR. HILL:

4 Q. No problem. And what's this McCormick and
5 something?

6 A. That was a training activity in Atlanta. I
7 believe it was on human trafficking.

8 Q. And so was that something that you
9 attended?

10 A. Yes.

11 Q. Anyone else from Clayton County CASA
12 attend?

13 A. Yes, I believe Annell Graniela -- or
14 Annell Hudson attended, as well.

15 Q. Okay. Could you turn to one, two, three,
16 four -- four pages until you see Clayton-14051?

17 A. Okay.

18 Q. There's some handwriting on here that
19 says, "Georgia CASA Braves tickets."

20 A. Mm-hmm.

21 Q. That's not your handwriting; is it?

22 A. No, it is not.

23 Q. And do you know whose handwriting that is?

24 A. I do not.

25 Q. So was this -- do you remember what this

1 payment was for? This \$312?

2 A. I do.

3 Q. Okay. What was that for?

4 A. Again, being part of the Metro

5 Collaborative, we had arranged to have a CASA

6 Awareness Day with the Braves. And the Metro CASA,

7 the Collaborative, sponsored X number of tickets for

8 all of the volunteers from each of the -- the main

9 counties, again, Clayton, Cobb, DeKalb, Fulton, and

10 Gwinnett.

11 And if we had additional volunteers that

12 wanted to attend, we had to purchase those tickets

13 ourselves. So we received our allocation and had an

14 overwhelming response from our volunteer pool. And

15 so we purchased the additional tickets to make sure

16 all that wanted to attend could attend the event.

17 Q. Okay. So all of these -- the tickets

18 purchased with that went to current CASA volunteers?

19 A. That is correct.

20 Q. Okay. You weren't buying Braves tickets

21 for Georgia CASA staff as an appreciation? That's

22 not what it was?

23 A. No.

24 Q. Okay.

25 Some of these have a little NR next to

1 them, and then at the bottom, it says, "No backup
2 documents." I'm thinking the NR means no receipts;
3 is that --

4 A. I don't know. That's not my handwriting.

5 Q. Okay. Do you know why there -- if there
6 were no receipts for these expenses, do you know
7 why?

8 A. I do not. My program assistant would help
9 facilitate processing the information, and so I
10 don't know.

11 Q. One of the expenses says, "Last Resort
12 Grill," and it's in Athens, Georgia; do you see that
13 one?

14 A. Mm-hmm.

15 Q. Do you know what that was for?

16 A. I actually -- I don't know specifically,
17 but I did meet with the owner of Last Resort, who
18 also reside -- has a home in Atlanta, and I believe,
19 has a restaurant in Atlanta. And I was hoping to
20 recruit him as a -- hopefully, a sponsor or a donor
21 for the program.

22 Q. Okay. Do you know what this Lowe's expense
23 of \$321.40 was for?

24 A. I don't recall.

25 Q. What types of things would you get from,

1 like, Lowe's or Home Depot that would be related to
2 volunteer recruitment, training, or retention?

3 A. The first thing that comes to mind would
4 be possibly the need for something related to Duck
5 Derby.

6 Q. Like what? Like what would -- what would
7 you get from a place like that related to Duck
8 Derby?

9 A. Well, each year, we had to construct the
10 racecourse. And over the course of the previous
11 year, where -- where the items were stored, they may
12 be damaged and need to be replaced. We wouldn't know
13 it until the last minute when the course was being
14 set up.

15 Q. Okay. So, like, building materials for the
16 course --

17 A. Mm-hmm.

18 Q. -- or something like that? Okay.

19 A. So that we would have our CASA Awareness
20 Day at the event.

21 Q. Okay. Could you turn a couple more pages
22 to Clayton-14034?

23 A. I'm sorry. Can you repeat the page?

24 Q. 14034.

25 A. Okay.

1 Q. It's a Dollar General expense. Do you have
2 any idea what that would be?

3 A. I believe it would have either been some
4 supplies for the ABC Toy Donation Drives they were
5 holding, given the date being December 3rd.

6 Q. What kind of supplies would you get from
7 Dollar General?

8 A. It may have been toys or if they need
9 signage, poster board, markers.

10 Q. So wouldn't it have been more appropriate
11 for the ABC to spend its own account for something
12 like that?

13 MR. MEW: Object to form.

14 THE WITNESS: Well, it would depend on the
15 situation and the -- the timing. If it was a --
16 a rush to get them materials or the supplies
17 and I was available.

18 BY MR. HILL:

19 Q. So did that happen sometimes? There would
20 be a rush to get materials or supplies, and so you
21 would expense it from the GAL account when maybe it
22 should have come from the ABC account?

23 MR. MEW: Object to form.

24 THE WITNESS: If I felt that it fell
25 within the terms of the MOU.

1 BY MR. HILL:

2 Q. Okay. Would the ABC account ever reimburse
3 you for something like that?

4 A. They did. One time, for their annual
5 Christmas Luncheon, they had met at, I believe,
6 Costco. Excuse me. And they had, I'm guessing, at
7 least six buggies full of food items, and they did
8 not have, apparently, their debit card.

9 And their option was to have to put all
10 the food back because, apparently, Costco would not
11 allow them just to leave it and then come back to
12 pay for it.

13 Q. Mm-hmm.

14 A. So I agreed to put it on my personal
15 credit card. And at the same time, this was
16 happening, the ABCs had received the Children's
17 Charity Grant of \$500 from Atlanta Motor Speedway.

18 And two of the board members and also ABC
19 members said that if I were to keep them from having
20 to put all the food back and then come back and shop
21 again, that they would have the \$500 Children's
22 Charity check deposited into the GAL. And then --
23 then I could get that money reimbursed to myself.

24 Q. Okay.

25 Up here, I don't think this is your

1 handwriting, but it says -- there's something -- a
2 note that says, "Written to GB." Do you see that, by
3 the \$45.51 amount?

4 A. Correct. That is not my writing.

5 Q. Right. Do you recall if there was some
6 check written to you from the GAL account in that
7 amount?

8 A. I don't recall.

9 Q. Okay. So no idea what that would have been
10 for?

11 A. No.

12 Q. I'm going to show you what I'm marking as
13 Defendant's Exhibit 6.

14 A. Okay.

15 (Exhibit Number 6 marked for
16 identification.)

17 BY MR. HILL:

18 Q. And I'll represent these are additional
19 bank statements for the GAL account from the year
20 2012. And you don't have any reason to dispute the
21 accuracy of these bank statements; correct?

22 A. That's correct.

23 Q. Okay. If you could go to the second page,
24 which is stamped Clayton-14027.

25 A. Okay.

1 Q. In the -- about the middle, there is a --
2 well, first, this is a -- this is your handwriting
3 in the lower half of the page? It says like, "Lunch
4 staff volunteer after Superior Court case," and all
5 of those below." Is that your handwriting?

6 A. Those entries, yes.

7 Q. Okay. The third one down, "Lunch meeting,
8 prospective board member." Do you see that?

9 A. Mm-hmm.

10 Q. "Olive Garden." So that's a -- a lunch
11 meeting with someone you were trying to recruit to
12 become a member of the board of FCCC?

13 A. That's correct. And board members were
14 considered volunteers.

15 Q. They were not CASA volunteers, though;
16 right?

17 A. Yes, they were considered CASA volunteers.

18 Q. Okay.

19 Well, they did not get paid for being on
20 the board, but they were not court-appointed special
21 advocates; right?

22 A. Some of the board members would actually
23 go through the training and work in the courtrooms.
24 Some opted just to volunteer as a board member, so
25 we counted them as volunteers in our numbers.

1 Q. Okay. Do you remember who this board --
2 prospective board member was?

3 A. I don't.

4 And if I may backup, it's possible that
5 was Andrea Fann.

6 Q. Mm-hmm.

7 A. She was the business manager -- or office
8 manager for Orthopaedic South in Morrow, and
9 actually was -- their offices were right next door
10 practically to the Olive Garden.

11 Q. Okay.

12 A. So it's possible that it was Ms. Fann.

13 Q. Okay. Is there any reason why you would
14 use the GAL funds for that as opposed to the FCCC
15 board funds?

16 A. Because that was a prospective volunteer
17 that I was recruiting and had been developing a
18 relationship with to get her to agree to come onto
19 the board.

20 Q. Did Andrea Fann become a court-appointed
21 special advocate?

22 A. She did.

23 Q. She did? Okay.

24 A couple of lines down, I think it says,
25 "Program camera." Am -- am I reading that correctly?

1 A. Yes, that's correct.

2 Q. What was that camera expense for?

3 A. That camera was expense -- we -- we had
4 been using the court camera, and I don't remember
5 what the shape of that camera had been. But we felt
6 like it was important to document via photos a lot
7 of our recruitment, retention, and training events
8 so that we could use it as awareness -- public
9 awareness about CASA.

10 Q. So you could put it on, like, a -- like,
11 the website? Something like that?

12 A. Correct.

13 Q. Okay. And then doing that would what?
14 Encourage more people to donate money or attend
15 future events; is that --

16 A. Correct.

17 Q. -- the idea?

18 A. Very similar to everyone getting a chuckle
19 out of the Duck Derby events with the duck
20 incorporated into the name. The visual is -- is
21 powerful.

22 Q. The last one, "Last Call," it says, "Lunch
23 meeting at airport prior to departure to San Juan."

24 A. Yes.

25 Q. What is the -- what was that lunch meeting

1 about?

2 A. Training.

3 Q. Okay. Well, who was at the lunch meeting?

4 A. Teske was present, as was Annell Graniela.

5 Q. Okay. And you all discussed the training
6 of CASA volunteers; is that what you're saying?

7 A. Correct.

8 Q. Do you remember specifically what you
9 discussed?

10 A. Some of our projects and ways that we
11 might -- could improve numbers of volunteers.

12 Q. Okay.

13 So it wasn't just expensing because we're
14 going out of town, and let's just put it on the GAL
15 funds account? Not like that?

16 A. No.

17 Q. Okay. Did you ever do that?

18 A. What's your question?

19 Q. Well, did you --

20 A. I'm sorry.

21 Q. Did you ever use the GAL account debit
22 card for something that was not volunteer
23 recruitment, training, or retention?

24 A. No.

25 Q. Okay.

1 The -- I believe it's the next page. It's
2 Clayton-14022. It's the very last one. It says,
3 "F.R.O.G.S., Atlanta, Georgia." And there's some
4 handwriting that says, "Restaurant bar, alcohol
5 only." Do you see that?

6 A. I do.

7 Q. And that's not your handwriting; right?

8 A. No, it is not.

9 Q. Would -- do you recall what this expense
10 was and if it was just alcohol only?

11 A. I had several meetings at F.R.O.G.S. with
12 potential volunteers and sponsors because of its
13 location. And I want to say that this -- given the
14 date, I had a meeting with -- her name was Jennifer
15 King with Turner Broadcasting.

16 And then there was a patient service
17 representative that Jennifer was friends with, and
18 that individual attended, as well. And that was part
19 of a recruitment effort.

20 Q. Okay. Do you recall if any of those people
21 became CASAs?

22 A. I don't, but if you look at the timeline,
23 I didn't really have the opportunity to see a lot of
24 the results of my efforts to recruit.

25 Q. Why not? What do you mean?

1 A. Because I was terminated.

2 Q. Well, this is 2012 there; right?

3 A. Correct.

4 Q. Okay.

5 Would -- well, when you're recruiting a
6 volunteer, are you saying it would take more than a
7 year of trying to recruit someone to become a CASA?

8 A. It could if you consider, for example,
9 that Turner Broadcasting probably has a thousand
10 employees.

11 Q. Mm-hmm.

12 A. Those decisions don't happen overnight. It
13 is a process, and it does take time.

14 Q. And are -- you're talking about people
15 becoming CASAs, or do you mean, like, building some
16 relationship where they're donating money to
17 fundraising events, or both?

18 A. I'm -- I'm referring to both, yes.
19 Recruitment, as I stated earlier, is relationship
20 building, and sometimes that takes time.

21 Q. So you're saying, like, had you not been
22 terminated, it's possible that this could have
23 worked out to where you got even more CASA
24 volunteers --

25 MR. MEW: Object to form.

1 BY MR. HILL:

2 Q. -- from efforts like these?

3 A. I absolutely believe that, and I can give
4 you a couple of examples. Aon Hewitt in Cobb County
5 because of -- not initially, but because of my
6 efforts to continue working with that company out of
7 Cobb County, we developed a very strong relationship
8 that took time. And they worked with us every year
9 and also worked with the Collaborative.

10 I can also give you the example of
11 Sutherland Law Firm. One of my very best volunteers,
12 Lovette Bennett, lived in McDonough, Georgia,
13 volunteered for us in Clayton County. And she worked
14 in Midtown at Sutherland.

15 And through our relationship, we developed
16 a relationship with her company who not only helped
17 with CASA awareness but also made financial
18 donations to our Collaborative.

19 I was also beginning to court Heery
20 Corporation, which is an architecture firm, I
21 believe practically next door to Sutherland. And we
22 were well on our way for building that relationship,
23 as well.

24 Q. Did -- so the ones you just mentioned, Aon
25 Hewitt, Lovette Bennett, and starting to court the

GERALD BOSTOCK
BOSTOCK V. CLAYTON COUNTY

October 14, 2021
175

1 Heery Corporation, did this result in any new CASAs
2 coming and joining the program?

3 A. Again, I -- I wasn't able to find out the
4 end result, but I have every belief that it would
5 have. My contacts and connections to Heery were
6 through softball.

7 Q. Okay. So someone played on the softball
8 team at Heery?

9 A. Not on -- not on a team in the HSL, but in
10 a business league.

11 Q. Oh, okay. So were you involved in a -- a
12 -- a softball league other than HSL?

13 A. Yes, I was.

14 Q. During the time that you worked for
15 Clayton County?

16 A. It was immediately thereafter, but I had
17 already signed up. It was a -- a -- if you will, a
18 minor league, sort of, to the HSL. It's known as
19 SSL, which is the Southern Softpaw League, and it's
20 a charitable league, all-inclusive.

21 And they actually played at SouthPark in
22 Clayton County, right next to where Scott Antique
23 Market is now located. And that league played there
24 for eight years. I played there two seasons.

25 Q. And you said it was shortly after you

1 started, like back in 2003?

2 A. Yeah, I -- I was playing with Hotlanta
3 Softball League, which what -- they referred to that
4 as the -- the spring league.

5 Q. Okay.

6 A. SSL is what's known as fall ball.

7 Q. Fall ball.

8 A. So it's played in the fall. So I started
9 in probably September.

10 Q. Is that -- does -- SSL, is that, like,
11 identified as a gay softball league?

12 A. Probably more than 70 percent of the teams
13 in HSL play in SSL.

14 Q. Okay.

15 I just didn't know if it, like, advertises
16 itself as, this is a gay softball league, or --
17 because you mentioned earlier, I think, just like a
18 business league. I wasn't sure if it has, like, some
19 designation that it puts out to the public.

20 A. Again, most of the teams in HSL and
21 players, which is predominantly gay, play in the
22 SSL.

23 Q. Okay.

24 But just because gay people might play in
25 the league doesn't mean it's, like, a gay softball

1 league. I'm just saying, like, Hotlanta Softball
2 League advertises itself as, this is a gay softball
3 league; is that right?

4 A. Correct.

5 Q. Okay. Does SSL do that, also?

6 A. Not on the same level as HSL, but I think

7 --

8 Q. Okay.

9 A. -- to your question, most people associate
10 it as a gay --

11 Q. Okay.

12 A. -- softball league.

13 Q. And so you started playing with HSL when?

14 A. In January of 2013.

15 Q. 2013. Okay.

16 And you made contacts, like the Heery
17 Corporation contacts, through S -- playing with SSL?

18 A. HSL.

19 Q. Oh, I'm sorry. You started playing with
20 HSL in January of 2013; right?

21 A. Correct.

22 Q. Okay. SSL, Southern Softball League, when
23 did you play with them?

24 A. That would have started in either August
25 or September, I believe, of 2013.

1 Q. Oh, okay.

2 You didn't play for them while you were --
3 for SSL, you did not play with that league while you
4 were employed with Clayton County; right?

5 A. Correct. I may have submitted my
6 application to play in the SSL, but the season had
7 not started yet for SSL.

8 Q. Okay. And you didn't expense any kind of
9 money for SSL from the GAL account; right?

10 A. No, I did not.

11 Q. Okay.

12 Did you pay for anything yourself
13 out-of-pocket for SSL while you were a Clayton
14 County employee?

15 A. No.

16 Q. Okay.

17 A. I don't believe there was a registration
18 fee or that if it was, I would have paid for that
19 out of my own pocket once I started with the actual
20 league.

21 Q. Okay. But just to back up for a second,
22 you said your contact for the Heery Corporation --

23 A. Mm-hmm.

24 Q. -- that came from playing with SSL?

25 A. No, it came from my involvement with HSL.

1 Q. Got it. Okay. Okay.

2 Any other softball leagues you played for
3 while you were working for Clayton County?

4 A. No.

5 Q. Okay. Can you turn two -- two more pages
6 to Clayton-14019? There's a few more Verizon
7 Wireless charges. I think you mentioned some were
8 for a netbook; is that right?

9 A. Three netbooks.

10 Q. Three -- three netbooks. Okay. Is that
11 what these are for?

12 A. Yes.

13 Q. Okay. Do you know what the Joe's on
14 Juniper's expenses is in the middle of the page?

15 A. Again, based on the date and my
16 recollection, I am thinking that was a part of a
17 recruitment and retention effort with a volunteer
18 from CNN.

19 Q. Okay. A volunteer for -- do you know what
20 this person was going to volunteer to do?

21 A. Yes, he was going to volunteer as a male
22 model for the Luncheon and Fashion Show that Georgia
23 CASA hosted. And he would consider himself an expert
24 on human trafficking, especially as it related to
25 children because he was a journalist.

1 Q. Okay. He wasn't going to be a CASA; was
2 he?

3 A. I was hoping at -- at best, I was hoping
4 that he would have become and -- and feel confident
5 that he would have become a CASA guardian.

6 Q. Okay. Could you go to that next page,
7 which is Clayton-14149? There's a couple -- this is
8 your handwriting on this page; right?

9 A. That is correct.

10 Q. Does that say, "COPS donation and COPS
11 reception?" Is that what that says?

12 A. It does.

13 Q. What is that?

14 A. COPS is an acronym for Council of
15 Programs. I stated earlier that there was a
16 mandatory Georgia CASA meeting held a couple of
17 times a year, and that was for -- that's what that
18 is, COPS.

19 Q. Okay. How would that relate to volunteer
20 training, recruitment, or retention?

21 A. Because that's what those meetings focused
22 on every time we met, all three categories.

23 Q. So giving you, like, best practices and
24 ideas that you can take back to your organization to
25 implement?

1 A. Correct.

2 Q. Okay.

3 A. And sometimes maybe marketing supplies.

4 Q. Okay. This other one says, "Gift cards,
5 DFCS foster parent appreciation." Is that what that
6 says?

7 A. I think it's association.

8 Q. Association. Okay. What are these gift
9 cards for?

10 A. They held a -- I believe, an annual event
11 for their foster parents. And we, meaning the CASA
12 Program, were always invited. And not only our
13 program but our court had a very close relationship
14 with DFCS.

15 Q. Mm-hmm.

16 A. And we often worked, you know,
17 hand-in-hand with foster parents, and of course,
18 their children. So we made that donation during
19 their annual event to not only show appreciation but
20 to also let our volunteers know that we were
21 appreciating their hard work on these cases and
22 trying to retain our volunteers.

23 Q. But the gift card is going to foster
24 parents?

25 A. Correct. But as I recall, we had

1 volunteers present during the event.

2 Q. Okay. But no volunteers -- no CASA
3 volunteers received the gift cards; is that right?

4 A. That would be my understanding, but again,
5 building relationships falls under recruitment.

6 Q. Okay.

7 If you would go two more pages in,
8 Clayton-14152. There is one for F.R.O.G.S. that
9 says, "Duck Derby sponsor meeting." And that's your
10 handwriting; right?

11 A. That is correct.

12 Q. So this would be a meeting for people --
13 for people who were sponsoring the Duck Derby; is
14 that right?

15 A. It would be. And it was for -- there were
16 about 12 people present. Duck Derby was discussed,
17 and we were actually in Atlanta. Again, referencing
18 the date --

19 Q. Mm-hmm.

20 A. -- there is a -- or used to be an annual
21 boxcar race down Piedmont. And the Ambassadors
22 Behind CASA were considering, in addition to working
23 -- helping us with Duck Derby and their toy drives,
24 that they were considering doing the boxcar race for
25 the next -- excuse me -- for the next year.

1 Q. The boxcar race wasn't a CASA event; was
2 it?

3 A. The event itself wasn't, but they were
4 going to enter some kind of duck boxcar.

5 Q. Okay. And that Chamber of Commerce lunch
6 staff expense down at the bottom, Chili's, what was
7 that for?

8 A. We participated and were members of the
9 Clayton County Chamber of Commerce, and we attended
10 all of their ribbon cuttings. And I'm assuming we
11 went with the -- the staff that had attended and
12 possibly somebody from the business that had the
13 ribbon cutting.

14 Q. So how does that relate to CASA volunteer
15 recruitment, training, and retention?

16 A. Because at every single Chamber event, we
17 talked about CASA to people that were attending the
18 event, to people that had businesses. Community
19 members would sometimes show up to show support for
20 whatever business would -- had the ribbon-cutting
21 ceremony. So we were always trying to recruit.

22 Q. Do you know if you got any CASA volunteers
23 from this meeting?

24 A. I believe we may have secured a -- a
25 sponsor.

1 Q. Okay. So a sponsor, like someone to donate
2 money to the FCCC board or --

3 A. Mm-hmm.

4 Q. -- to sponsor a duck or something like
5 that?

6 A. Or to sponsor the children or toy drives
7 at Christmas.

8 Q. Okay. Sponsoring the toy drives; is that
9 what you --

10 A. Mm-hmm.

11 Q. Okay.

12 A. Yes.

13 Q. Could you turn, I think, about four or
14 five pages to Clayton-14155? It looks like there is
15 a lot of Duck Derby expenses on this one. This is
16 your handwriting; right?

17 A. That is correct.

18 Q. What's that top one? Duck Derby something
19 meeting, what does that say?

20 A. Preparation meeting.

21 Q. Okay.

22 And then another Duck Derby prep meeting
23 and sponsor meeting below that; right?

24 A. Yes.

25 Q. What is, "Easel for poster?" Is that what

1 that says?

2 A. It is.

3 Q. Was that something for the Duck Derby? The
4 easel?

5 A. Yes, we had a -- some kind of laminated --
6 I can't recall if it was a National CASA image with
7 a child or if it was an actual Duck Derby
8 advertisement, but it was an advertisement for CASA
9 for awareness.

10 Q. Okay. So since the FCCC board put on the
11 Duck Derby, why weren't they paying for these
12 expenses?

13 MR. MEW: Object to form.

14 THE WITNESS: I felt it was important for
15 community awareness and recruitment.

16 BY MR. HILL:

17 Q. Okay. It would have been appropriate for
18 the FCCC board to pay for them; right?

19 MR. MEW: Object to form.

20 THE WITNESS: It may have. I don't know
21 how long that would have taken.

22 BY MR. HILL:

23 Q. The thing that I'm kind of struggling with
24 is that something like the Duck Derby, it raises
25 money. It seems to have a good purpose. But the

GERALD BOSTOCK
BOSTOCK V. CLAYTON COUNTY

October 14, 2021
186

1 money goes to the FCCC board. And they get that
2 money, but expenses like this for putting on an
3 event seems to be coming from the GAL account.

4 And so it's like a one-way path where
5 money is leaving the GAL account, and then the
6 fruits of that labor are going into the board
7 account. I mean, doesn't that seem kind of weird?

8 MR. MEW: Object to form.

9 THE WITNESS: I don't think it's weird at
10 all. I -- as long as I'm applying to the terms
11 of the MOU for recruitment, training, and
12 retention of, at that time, my volunteers and
13 my program, if I felt that it was appropriate.

14 BY MR. HILL:

15 Q. Did you ever think it felt like you were
16 raising money for the FCCC board?

17 MR. MEW: Same objection.

18 THE WITNESS: Not at all. And I can tell
19 you that the FCCC spent a lot of money, of
20 their money, on our volunteers, and on our
21 program.

22 BY MR. HILL:

23 Q. Mm-hmm. Which is what they were supposed
24 to do; right? Because they are supposed to be
25 supporting your program; right?

1 A. Correct.

2 Q. Did you ever say, why don't -- to the
3 board members, did you ever say, why aren't you guys
4 spending money for, you know, building supplies for
5 the Duck Derby and these meetings with sponsors?

6 MR. MEW: Object to form.

7 THE WITNESS: They did have expenditures
8 for those same items.

9 BY MR. HILL:

10 Q. Okay.

11 But not these ones, at least. I'm just
12 asking, did you ever say, GAL account really
13 shouldn't be paying for this? The board, this is
14 your event, you should really be paying for it. Did
15 you ever do that?

16 MR. MEW: Object to form.

17 THE WITNESS: I recall some conversations
18 about GAL versus FCCC, but I -- I don't recall
19 any specific.

20 MR. HILL: Okay.

21 Could you turn a couple of pages to
22 Clayton-14 -- I think it's 14158. It could be
23 14458. There's some print that's overlapping,
24 making it hard to read. The -- the date on the
25 top is 11/07/2012.

1 MR. MEW: Hey, Michael.

2 MR. HILL: Yeah.

3 MR. MEW: When you close out this exhibit,
4 would you mind if we take a break? It's been a
5 --

6 MR. HILL: Of course.

7 MR. MEW: -- little bit. Thanks.

8 MR. HILL: Yeah, I'm getting near the end
9 of this one, so that will be just a second.

10 BY MR. HILL:

11 Q. This is your handwriting on this page?

12 A. Yes, it is.

13 Q. Okay. There's another gift card and gift
14 donations, Bubbles and Publix. Do you know what --
15 what those were for?

16 A. That was for the Metro Collaborative
17 Superhero 5k Run.

18 Q. So was this -- the gift card a donation
19 that you were making from the GAL account to the
20 Metro Atlanta CASA 5K Run?

21 A. For the purposes of that card being given
22 to an individual participating in the 5K run, yes,
23 as it relates to recruitment and CASA awareness.

24 Q. But the Metro Atlanta 5K Run, that's
25 recruiting people -- potentially, recruiting

1 volunteers for all the CASA programs in the Metro
2 Atlanta area; right?

3 A. That is correct.

4 Q. Do you know if the other CASA -- other
5 local CASA programs also expensed money towards the
6 Metro Atlanta CASA Program?

7 A. I would venture to say yes to that. I
8 believe we were asked to donate the -- the gift
9 cards.

10 Q. When you say were asked, what do you mean?

11 A. By the Metro Collaborative, for each
12 program participating to --

13 Q. Okay.

14 But I know what -- in the MOU, I know we
15 go on about, like, volunteer recruitment, training,
16 and retention. It means for people who are CASA
17 volunteers in Clayton County; right?

18 MR. MEW: Object to form.

19 THE WITNESS: It doesn't say that in the
20 MOU. It -- it says to be spent on the purposes
21 of recruitment, training, and retention.

22 BY MR. HILL:

23 Q. So if you are spending money for the
24 purpose of recruiting, training, or retaining CASA
25 volunteers in DeKalb County, would you think that

1 would be within the scope of the MOU?

2 MR. MEW: Same objection.

3 THE WITNESS: As it relates to impacting
4 Clayton County CASA, yes, because there might
5 be a training class sponsored by Metro
6 Collaborative CASA in DeKalb County, and
7 Clayton County may have four or five
8 individuals in that training class --

9 BY MR. HILL:

10 Q. Mm-hmm.

11 A. -- or there may be a resident of DeKalb
12 County that chose to do their volunteer work in
13 Clayton County. So it is very feasible.

14 Q. Okay.

15 But generally, you would not want to use
16 GAL funds to recruit a CASA volunteer to the -- the
17 DeKalb County CASA Program, if there is one; right?

18 MR. MEW: Object to form.

19 THE WITNESS: There is a -- yes, a DeKalb
20 County CASA Program.

21 BY MR. HILL:

22 Q. Okay.

23 A. My recruitment efforts focused on Clayton
24 County.

25 Q. Mm-hmm.

1 A. But if that meant that a prospect decided
2 to volunteer with DeKalb County, for whatever
3 reason, whether it was where they worked, where they
4 lived --

5 Q. Mm-hmm.

6 A. -- didn't want to do it in the same county
7 where they lived, which was the case sometimes. As
8 long as that person agreed to do it and go through
9 the training because that meant another child was
10 impacted by those services that CASA volunteers
11 would bring into the courtroom.

12 Q. Okay.

13 So if I understand what you're saying, it
14 would be within the scope of the MOU as long as it
15 supports the CASA program -- any CASA -- as long as
16 it supports any CASA program --

17 MR. MEW: Object to form.

18 BY MR. HILL:

19 Q. -- even if it's not Clayton County?

20 A. I don't believe that's how I responded.
21 And, again, my primary focus was recruitment for
22 Clayton County.

23 Q. Right.

24 A. But in that process, like I said, using
25 the -- DeKalb County as an example, someone might

1 change midway through the training and decide they
2 were going do it in one county. And now, they've met
3 maybe the staff from other counties, and they prefer
4 to go to that county.

5 So my goal was to recruit as many people
6 as we could. And it was successful. We had one of
7 the largest, if not the largest, CASA volunteer
8 programs in the state of Georgia because of our
9 recruitment, training, and retention efforts.

10 Q. Okay. You wouldn't use the GAL account to
11 recruit someone to become a CASA volunteer in
12 Tennessee; right?

13 A. No.

14 Q. Okay. But other counties in Georgia, you
15 might?

16 MR. MEW: Object to form.

17 THE WITNESS: Not intentionally. It might
18 happen if that prospect changed their mind or
19 never revealed, for whatever reason, that they
20 were not going to proceed becoming a volunteer
21 for Clayton County.

22 MR. HILL: Okay. Okay.

23 MR. MEW: Let's take a break.

24 THE VIDEOGRAPHER: The time is 3:06. We
25 are going off the video record.

1 (A break was taken.)

2 THE VIDEOGRAPHER: We are back on the
3 video record. The time is 3:28.

4 BY MR. HILL:

5 Q. Mr. Bostock, I'm not going to go through
6 these ones in as much detail. I just want to get you
7 to identify something. This is -- I'm going to mark
8 this as Defendant's Exhibit 7 right here. Okay.

9 Okay. And so these appear to be bank
10 statements for the GAL account in 2013. It looks
11 like the months of January, February, March, and
12 April. Do you have -- have any reason to dispute the
13 accuracy of these bank statements?

14 A. No.

15 (Exhibit Number 7 marked for
16 identification.)

17 BY MR. HILL:

18 Q. Okay. And this is your handwriting on the
19 first three pages and the last two entries on the
20 last page?

21 A. On the first page, there's some
22 handwriting that I'm not familiar with.

23 Q. Is that --

24 A. That is not mine.

25 Q. Is that where it says, "Rest, Bar, Blake's

1 on the Park?" That's not your handwriting?

2 A. No, it's not.

3 Q. Okay. And then, "Softball league," down at
4 the bottom. Is that your handwriting?

5 A. No, it's not.

6 Q. Okay. But all the rest of it is?

7 A. Well, there's two entries on -- the last
8 two -- yeah, it's softball league, those are not my
9 handwriting.

10 MR. MEW: And I'm sorry, just for purposes
11 of the record, did you -- did I'm sorry. Did
12 the witness say what appears to be a sticky
13 note?

14 BY MR. HILL:

15 Q. The stick -- yeah. What appears to be a
16 sticky note, is that your handwriting?

17 A. No, it is not.

18 Q. Okay. Got it.

19 A. And on the back page, there are additional
20 notes that are not my handwriting.

21 Q. And that's the top two -- the first two
22 entries on the back page?

23 A. That is correct.

24 Q. Got it.

25 Okay. So these last -- this one and the

1 previous two exhibits, it looks like the GAL account
2 started off 2011 with about \$1,200 in it. And then
3 started off 2012 with about \$3,300, roughly. In
4 2013, with about \$2,300, approximately; is that
5 correct?

6 A. It appears so, yes.

7 Q. Okay.

8 And is that consistent with the -- the
9 whole time you worked at Clayton County, that -- is
10 that amount in the 2 to 3,000 range, typically, what
11 the GAL account had in it?

12 A. As I recall, yes.

13 Q. Okay. I'm going to show you what I'm
14 marking as Defendant's Exhibit 8.

15 And if you'll notice, compared to the
16 other previous three exhibits, the last four digits
17 of the account number of this one are different. And
18 so would I be correct in saying this is the -- these
19 would be bank statements for the FCCC board account
20 as opposed to the GAL account?

21 A. I'm assuming so, especially since the top
22 does not indicate DBA guardian ad litem account.

23 (Exhibit Number 8 marked for
24 identification.)

25 BY MR. HILL:

1 Q. Okay.

2 And so looking at these three pages, it
3 looks like the FCCC board account started off 2011
4 with about \$16,000. And the next page is 2012
5 January, starting off with around \$17,000. And then
6 in January of 2013, the last page, it's about
7 approximately \$33,000. Do you see all that?

8 A. I do.

9 Q. Okay.

10 So the FCCC board account, you know, at
11 least from 2011 to 2013, you know, almost doubled;
12 correct?

13 MR. MEW: Object to form.

14 THE WITNESS: Well, yes, and my
15 explanation for that would be that the 14th
16 Annual Darlin' Duck Derby had occurred the last
17 Saturday in September. So they were still
18 processing, and they would normally see an
19 influx of money after that event.

20 BY MR. HILL:

21 Q. The last Saturday in September of every
22 year --

23 A. 20 --

24 Q. -- that happens?

25 A. Correct.

1 Q. Okay.

2 A. The 14th Annual was September of 2012.

3 Q. Was that an unusually large Duck Derby, as
4 far as money coming in?

5 A. That was one of our more successful.

6 Q. Okay.

7 And so you're saying that would be a
8 reason why the January 2013 statement has so much
9 more money compared with the January statements for
10 2011 and 2012?

11 A. Correct.

12 Q. Okay. Okay. I'm showing you Defendant's
13 Exhibit 9. And you've seen this document before;
14 correct?

15 A. Yes, I have.

16 (Exhibit Number 9 marked for
17 identification.)

18 BY MR. HILL:

19 Q. Okay.

20 And this would be -- I think this has been
21 referred to as interrogatories that you received
22 from John Johnson in May 2013; is that right?

23 A. Correct.

24 Q. Okay. Do you recall receiving this?

25 A. I do.

1 Q. And did you -- did you discuss this
2 document with John Johnson or anyone else when you
3 received it?

4 A. No, as I recall, it was presented to me,
5 and I was given a deadline, and then Mr. Johnson
6 walked away.

7 Q. Okay. Did you ask anybody -- anyone else
8 -- like any -- or did you ask anybody at all, like,
9 what it was about?

10 A. I don't recall. I -- Mr. Johnson may have
11 said as a result -- as it -- as a result of the
12 audit, but I'm not exactly sure.

13 Q. Okay. Was it unusual for you to get a
14 document like this?

15 A. Yes.

16 Q. Okay. What did you think when you received
17 that memo with the questions?

18 A. When I read Number 10, that's when it hit
19 me that the county administration was not happy that
20 I had joined the Hotlanta Softball League to recruit
21 potential volunteers and sponsors because the league
22 identified as gay.

23 Q. Did you talk with anyone about that
24 feeling or realization that you came to?

25 A. I believe in passing with Debbie Stinson

1 and briefly with Carol Gossett, I told them that
2 they were going to try to fire me because I'm gay.

3 Q. So you think you told Debbie Stinson that
4 you believed you were about to be terminated because
5 you're gay?

6 A. Mm-hmm.

7 Q. Do you remember where this occurred?

8 A. In the CASA offices at the new court
9 building.

10 Q. What did Debbie Stinson say in response?

11 A. You're not going to get fired.

12 Q. Was anything -- did anything else
13 transpire in that conversation?

14 A. The -- there was a brief conversation. As
15 you may recall, I had stated I was the victim of a
16 hit-and-run in April. And that case had been -- I
17 guess it had been resolved.

18 And I was in the position to look for
19 another vehicle to replace my vehicle. And had -- in
20 previous conversations with Debbie, had mentioned to
21 her that I had found a truck that I was interested
22 in and that I might be buying it that weekend. And
23 she reached out, and put her hands on me and said,
24 don't you dare buy anything.

25 Q. Any idea why she said that?

1 A. I assumed she knew something and wasn't
2 willing to tell me.

3 Q. So are you saying that you believe that
4 she knew you were going to be fired? Is that what
5 you're saying?

6 A. Yes.

7 Q. Okay. But she told you, you were not going
8 to get fired?

9 A. That is correct.

10 Q. Okay.

11 Did that happen -- this conversation about
12 the -- possibly buying a truck, did that happen
13 before or after the conversation where you told
14 Debbie Stinson you think you're about to get fired?

15 A. It was the same conversation.

16 Q. Oh, okay.

17 So when she said, don't buy anything, you
18 interpreted that as meaning don't buy anything
19 because you're about to get fired; is that what
20 you're saying?

21 A. Or that something was about to happen.
22 That was the Friday, as I recall, before I was
23 terminated on that Monday.

24 Q. Okay.

25 So what did you say when she told you,

1 you're not going to get fired?

2 A. I don't recall saying anything because --
3 other than I was most likely going to go back to the
4 dealership on -- over the weekend and purchase the
5 pickup truck.

6 Q. Did she --

7 A. And then she gave her response.

8 Q. Oh. And did you go and purchase the pickup
9 truck at that time?

10 A. No, I did not.

11 Q. Okay. Did you not purchase it because
12 Debbie Stinson told you not to buy it?

13 A. Because, again, reading Question Number 10
14 and the way Debbie Stinson -- just her general
15 demeanor, I, again, felt like something was about to
16 happen.

17 Q. Okay. So tell me about the conversation
18 with Carol Gossett that you just referred to.

19 A. It was similar. I had mentioned that I
20 felt as though the court administration did not
21 approve of my joining the Hotlanta Softball League
22 and basically recruiting within the league and
23 trying to bring in additional volunteers, sponsors,
24 and donors.

25 Q. And what did Carol Gossett say?

GERALD BOSTOCK
BOSTOCK V. CLAYTON COUNTY

October 14, 2021
202

1 A. As I recall, she sort of laughed it off
2 and said, no, I don't think you have anything to
3 worry about.

4 Q. Okay. Did you say anything back to her?

5 A. No, I don't -- I don't recall saying
6 anything.

7 Q. When did that conversation occur?

8 A. It would have been -- I don't recall it
9 being the same day, that Friday that I had the
10 conversation with Debbie Stinson. I want to say it
11 was maybe a few days to right about a week prior.

12 Q. So the conversation with Carol Gossett
13 happened first?

14 A. Yes.

15 Q. Okay. A few days to a week earlier; is
16 that what you said?

17 A. I want to say maybe -- maybe a few days.

18 Q. Okay. Do you remember where that
19 conversation was?

20 A. It was also in the CASA office space.

21 Q. Okay. Anyone else in the conversation
22 between you and Carol Gossett?

23 A. Not that I recall.

24 Q. What about the -- the conversation with
25 Debbie Stinson, anyone else present?

GERALD BOSTOCK
BOSTOCK V. CLAYTON COUNTY

October 14, 2021
203

1 A. Not that I recall.

2 Q. Okay. Did you tell anybody else you
3 thought you were about to get fired?

4 A. I can't remember.

5 Q. Okay. Oh. I'll show you what I'm marking
6 as Defendant's Exhibit 10.

7 And these are your responses to the
8 questions posed in Exhibit 9; right?

9 A. It appears so, yes.

10 (Exhibit Number 10 marked for
11 identification.)

12 BY MR. HILL:

13 Q. Okay. Now, I know the date says
14 05/28/2012, but that's a typo; right?

15 A. Yeah.

16 Q. Yeah.

17 A. I believe so.

18 Q. Got it. Okay.

19 Did you ever discuss the -- so all this
20 information that you provided in response, did you
21 ever discuss this information with anyone at the
22 county?

23 MR. MEW: Object to form.

24 THE WITNESS: Without going into any
25 detail, I did ask for some assistance from my,

1 at the time, program assistant, Raquel
2 Stalimire (ph), to help gather some of the
3 information that had been requested.

4 BY MR. HILL:

5 Q. Okay.

6 But after you provided this information,
7 let's say -- just -- did you talk about it with John
8 Johnson, Colin Slay, or Judge Teske?

9 A. No.

10 Q. Okay.

11 There's a reference under Number 2 to the
12 CASA logo. What's the CASA logo? Meaning -- what I'm
13 asking, is like, what does it say?

14 A. That was The Duck Truck that I had
15 referred to, that primarily my CASA guardians, kind
16 of, were responsible for. It had the -- an image of
17 a duck running down both sides of the truck. And we
18 also had the actual Clayton County CASA logo placed
19 -- or painted onto the truck, as well.

20 Q. Okay. Did it say Friends of Clayton County
21 CASA, or did it say Clayton County CASA?

22 A. I believe it said -- it was the logo,
23 Clayton County CASA.

24 Q. Okay. Is that logo still in use, the same
25 logo, today?

1 A. That I don't know.

2 Q. Okay.

3 So if you look back real quick at Document
4 -- I mean, Exhibit Number 9 and Question Number 10
5 that we were talking about a second ago. You were
6 asked to -- if you had -- sorry, scratch that.

7 In the middle of that paragraph is a
8 question that says, "Did you recruit any volunteers
9 for Clayton County CASA directly as a result of this
10 sponsorship?" Talking about the HSL Sponsorship. And
11 then it asks for the name and contact info of any
12 such Clayton County CASA volunteer.

13 And in your response in Exhibit 10, you
14 give a pretty lengthy response on what all that was
15 for. But you do not identify any Clayton County CASA
16 volunteers in this response; correct?

17 MR. MEW: Object to form.

18 THE WITNESS: That is incorrect.

19 BY MR. HILL:

20 Q. Okay. Explain to me how it is incorrect.

21 A. Chris Burton with AT&T is referenced.

22 Q. Mm-hmm.

23 A. Scott Legnon with Children's Healthcare of
24 Atlanta is listed. Edwin Ness, a journalist with
25 CNN, is mentioned.

1 Q. Okay.

2 A. It's also mentioned that Dragon Con
3 Atlanta committed to be a donor or sponsor for the
4 2013 Darlin' Duck Derby. And Heery Corporation is
5 also referenced.

6 Q. Okay. But these people did not become
7 court-appointed special advocates; correct?

8 A. They became CASA volunteers that hopefully
9 would have, at best, become CASA guardians. But they
10 did volunteer their -- their time and services.

11 Q. Okay.

12 A. That would have been, most likely, the
13 next step for them.

14 Q. Okay. But they did not volunteer their
15 time and services as court-appointed special
16 advocates; right?

17 A. They volunteered as a part of Clayton
18 County CASA.

19 Q. Okay. But not as CASAs personally
20 themselves; right?

21 A. Well, I consider them a CASA volunteer.

22 Q. I understand that -- that we can have
23 differences about what we mean by volunteers. And
24 I'm just -- I'm just making it clear that they did
25 not volunteer as court-appointed special advocates;

1 did they?

2 A. They had not completed the application or
3 the training by the time I had been terminated.

4 Q. Okay. And they didn't tell you they were
5 going to, did they?

6 A. Those individuals did not. There is one,
7 Chris Bodeen, that had expressed interest and had
8 told me he had heard of CASA before. And when we had
9 returned from Birmingham, he was going to begin the
10 application process.

11 Q. Okay. Is he mentioned in the response in
12 Number 10?

13 A. I, for some reason, don't believe I see
14 him listed in here.

15 Q. Okay. So he's not mentioned in this
16 response?

17 A. I do not see his name.

18 Q. Okay.

19 A. No, sir.

20 Q. And was he someone who played in the HSL
21 League?

22 A. That is correct. He played on my team.

23 Q. On your team. Okay.

24 A. And I believe he lived either in DeKalb or
25 Fulton County.

1 Q. Okay.

2 And I think -- I think you said this, you
3 do -- you don't -- you do not know if he filled out
4 the application and went through the training to
5 become a CASA even, like, after your termination?

6 A. I spoke with Chris at some point after I
7 was terminated, and he made it very clear to me he
8 would not be volunteering his services or efforts
9 with Clayton County after my termination.

10 Q. Okay. What did he -- the best you can
11 recall, what were his exact words?

12 A. I want to say something to the effect of,
13 they're crazy if they think I will come to Clayton
14 County now that they fired you.

15 Q. What did you tell him in that conversation
16 before he made that response?

17 A. Well, he knew that I had been terminated,
18 and my -- my whole team knew.

19 Q. Okay. Did you tell him that you believed
20 you had been terminated because of your sexual
21 orientation?

22 A. Yes, I did.

23 Q. Okay.

24 And so then he responded, well, I'm not
25 going to volunteer if that's what happened,

1 something along those lines; right?

2 A. Correct.

3 Q. Okay. Did you tell everyone on your team
4 that that was the reason you believed you were
5 terminated?

6 A. Well, I didn't really have to tell them
7 because the coach had seen the ABC News coverage and
8 contacted me immediately, and then I think sent a
9 message to the -- the team members that there had
10 been the termination.

11 Q. Did he send -- like, was this an e-mail?

12 A. Probably.

13 Q. And did the e-mail say, Gerald Bostock has
14 been fired because he's gay? Did he say that?

15 A. I don't know what his comment was.

16 Q. Okay.

17 Because the -- the ABC -- when you said
18 the ABC News coverage, are you talking about that
19 initial -- that interview between Judge Teske and
20 Richard Belcher that was televised?

21 A. Correct.

22 Q. Okay. And that interview didn't say
23 anything about your sexual orientation; right?

24 MR. MEW: Object to form.

25 THE WITNESS: When referencing restaurants

1 in and around the Midtown area, I think most
2 people found it odd that both had rainbow flags
3 waving out front.

4 BY MR. HILL:

5 Q. Oh, okay. The footage had rainbow flags on
6 --

7 A. Correct.

8 Q. Okay.

9 So do you think an objective person
10 watching that news footage would have drawn the
11 inference that your sexual orientation played a role
12 in the termination?

13 A. I think that's reasonable.

14 Q. Regarding the -- the HSL sponsorship, was
15 -- there was going to be -- was -- part of that
16 sponsorship, there was going to be some message or
17 something on the jerseys of the uniforms?

18 A. Not on the jerseys --

19 Q. Okay.

20 A. -- of the actual uniform, but it was a
21 team T-shirt that listed the sponsors of the team.
22 And the team had agreed to place the Clayton County
23 CASA logo dead center on the back of the team
24 T-shirt.

25 Q. Okay. Did those T-shirts get made?

1 A. They did.

2 Q. Do -- do you still have one of those
3 shirts?

4 A. I do not have the shirt. I turned it over
5 to my legal team.

6 MR. HILL: Okay. I don't think we've seen
7 -- have we seen like a --

8 MR. MEW: We haven't given it to you, but
9 if you want to see it --

10 MR. HILL: Okay.

11 MR. MEW: -- we can make it available.

12 MR. HILL: Okay.

13 MR. MEW: I mean, it's going to be
14 evidence in the case in all likelihood. So if
15 you want to take a picture or anything like
16 that.

17 MR. HILL: Yeah, I -- I just don't think
18 we've seen what it looks like, but okay.

19 BY MR. HILL:

20 Q. So in addition to the shirt, there was
21 also a banner; is that right?

22 A. That is correct. There was a -- what you
23 would call a sponsor banner. And the -- the logo was
24 placed on that -- that same logo was placed on the
25 banner.

1 Q. And so the banner would -- the idea was it
2 would be displayed at games, and so the people who
3 come to see it, can see the banner?

4 A. That is correct. It -- not only at games
5 within the league but also at tournaments that the
6 team attended.

7 Q. Okay. And the banner would be placed, I
8 guess, like along, like, the outfield wall or
9 something like that?

10 A. For games held within HSL, the banner
11 would be on the fence of the actual -- kind of,
12 like, at the dug-out. Now, at the tournament, our
13 banner was chosen to be placed at the front entrance
14 that had probably upwards of 2,000 people walk by it
15 every single day of the tournament.

16 Q. Okay.
17 And what it -- what was -- what was on the
18 banner that was CASA-related? Was it the same -- the
19 same logo you were talking about?

20 A. Correct. The same Clayton County CASA
21 logo.

22 Q. Okay. And it said Clayton County CASA, not
23 Friends of Clayton County CASA?

24 A. Correct.

25 Q. Okay.

1 And I think I understand how you're saying
2 this fits in the MOU, but just to make sure we're on
3 the same page.

4 Is it your testimony that that would fit
5 within the MOU under, you know, recruitment --
6 volunteer recruitment because people who see the
7 logo, it might encourage them to either become CASAs
8 themselves or to donate money to the Friends of
9 Clayton County CASA?

10 A. I absolutely stand by that, evidenced by,
11 I had one verbal commitment from a teammate. I also
12 had another teammate that agreed to volunteer as a
13 male model for the Georgia CASA Fashion Show. I had
14 the representative from CNN that was a tie-in to the
15 -- the league, as well.

16 And I had two verbal commitments for
17 sponsorships. One of which was Dragon Con Atlanta,
18 for \$2,500. So it most definitely fits under
19 community awareness, which equates to recruitment,
20 training, and retention.

21 Q. But you understand that, like, Colin Slay,
22 Judge Teske, and some others could have a different
23 reading of the MOU and think that doesn't fall
24 within recruitment, training, or retention?

25 MR. MEW: Object to form.

1 THE WITNESS: What I know is the wording
2 in that MOU, and I applied based -- my actions
3 based on the wording that I read and the
4 conversations that were held during the
5 development of that MOU.

6 BY MR. HILL:

7 Q. And those conversations were with other
8 advisory board members; is that right?

9 A. No, as stated earlier, with
10 Judge Benefield and --

11 Q. Okay.

12 A. -- and with Judge Simmons.

13 Q. Did you actually ask Judge Benefield or
14 Judge Simmons about what the scope of recruitment,
15 training, and retention is?

16 A. My recollection of those conversations is
17 that the intent was meant to be broad so that we had
18 the ability to continue to grow a very strong
19 program that did fluctuate occasionally with our
20 number of volunteers. But they wanted us to have
21 that flexibility with how those funds were spent as
22 long as it fell under that net of recruitment,
23 training, and retention.

24 Q. Okay.

25 Do you remember if you actually asked

1 Judge Simmons or Judge Benefield something like, is
2 it okay if I spend GAL funds on something that
3 results in donations going to the Friends of Clayton
4 County CASA?

5 MR. MEW: Object to form.

6 THE WITNESS: I don't recall some of those
7 specifics, no.

8 BY MR. HILL:

9 Q. Okay.

10 A. And if I -- if -- if I can?

11 Q. Mm-hmm.

12 A. I think when I'm told that the intent is
13 very broad, I think I took them at their word.

14 Q. Did they use that language, the intent is
15 very broad? Someone actually said that?

16 A. That's what I recall.

17 Q. Okay.

18 A. And that's why -- or that's what I recall
19 as to why they wanted the money to be turned over to
20 the FCCC.

21 Q. After they said, you know, whoever said
22 that the intent is very broad, did you go into any
23 specific examples? What about this? What about that?

24 A. I don't recall.

25 Q. Okay. Do you remember which person said

GERALD BOSTOCK
BOSTOCK V. CLAYTON COUNTY

October 14, 2021
216

1 the intent is very broad --

2 A. I don't.

3 Q. -- or words to that effect?

4 A. I'm sorry, I don't.

5 Q. Okay.

6 MR. MEW: I'm going to go with your
7 indulgence --

8 MR. HILL: Yeah.

9 MR. MEW: I'm going to do what we did --
10 or what you guys did during the Judge Teske,
11 and come around so I can see.

12 MR. HILL: Oh, sure.

13 MR. MEW: I assume you're going to play it
14 for the witness.

15 MR. HILL: Yes. Yes.

16 MR. MEW: All right.

17 MR. HILL: Just going to play it for the
18 witness.

19 MR. BUECHNER: What are we playing?

20 MR. HILL: This is a video that we
21 produced.

22 MR. BUECHNER: Okay.

23 MR. HILL: I think -- so this will be --
24 where does this thing go.

25 MR. BUECHNER: Did you call it an exhibit?

1 MR. HILL: Yes, and then we'll produce
2 this drive -- we'll produce this drive to the
3 court reporter. Exhibit -- this will be 11.
4 Goodness gracious.

5 (Exhibit Number 11 marked for
6 identification.)

7 MR. BUECHNER: Am I out of frame for
8 purposes of the video?

9 MR. HILL: Okay. Okay.

10 (Exhibit Number 11 played for
11 the record.)

12 BY MR. HILL:

13 Q. So that's you speaking in the video;
14 correct?

15 A. Yes.

16 Q. Okay. And did you write those words
17 yourself?

18 A. I participated.

19 Q. Okay.

20 So I think you said this earlier, but are
21 you -- you are not contending that the county
22 learned of your sexuality based on your joining the
23 Hotlanta Softball League?

24 MR. MEW: Object to form.

25 THE WITNESS: Repeat that again, please. I

1 want to make sure I answer you correctly.

2 BY MR. HILL:

3 Q. Yeah, I understand.

4 So I think you said earlier that you are
5 not contending in this lawsuit that the county
6 learned of your sexuality based on the fact that you
7 joined HSL.

8 MR. MEW: Same objection.

9 THE WITNESS: Yes.

10 BY MR. HILL:

11 Q. Okay.

12 So having watched that video, do you not
13 agree that that is the clear implication of saying,
14 I was fired because I'm gay? For ten years, I had a
15 glowing record, and then I joined a gay softball
16 league. That's when things changed. Within
17 six months, I was fired.

18 So do you not agree that that is
19 suggesting that when you joined the gay softball
20 league, that is when your employer learned you were
21 gay?

22 MR. MEW: Objection to form.

23 THE WITNESS: What I'm saying is, it was
24 as a result of joining that. In other words, we
25 know you're gay. Keep it at home. Keep it

1 quiet. Don't go into Midtown, go into gay bars
2 and restaurants, and recruiting from within the
3 gay community, including your gay softball
4 team.

5 BY MR. HILL:

6 Q. Okay. So when you say that's when things
7 changed, what things changed?

8 A. Well, I, all of a sudden, received notice
9 of an audit --

10 Q. Mm-hmm.

11 A. -- that I had not had to deal with prior.
12 There was attitude change towards me within court
13 administration.

14 Q. Can you tell me about the attitude change?

15 A. A lot less personal or personality. More
16 direct -- directives or -- all the social aspect of
17 anything removed from any type of conversation.

18 Q. Well, who -- who specifically are you
19 talking about?

20 A. I would contend Colin Slay, John Johnson,
21 and Steve Teske.

22 Q. Okay. Anyone else's attitude change
23 towards you?

24 A. Those would be the three that stand out
25 the most.

GERALD BOSTOCK
BOSTOCK V. CLAYTON COUNTY

October 14, 2021
220

1 Q. When do you contend that Judge Teske, John
2 Johnson, and Colin Slay found out that you had
3 joined Hotlanta Softball League?

4 A. I don't recall for Colin Slay or John
5 Johnson, but I clearly recall a conversation with
6 Steve Teske. And that would have probably been the
7 end of March, possibly the very first part of April.

8 Q. Okay. And what was -- how did that
9 conversation go?

10 A. At the time, I thought it had gone well.
11 Meaning, I had given him the information that I had
12 decided to, you know, join the team, and I mentioned
13 the benefit to Clayton County CASA.

14 Q. Mm-hmm.

15 A. And knowing that Steve Teske is a beer
16 drinker, or had been, even made his own beer, there
17 was a fundraising event for the team at Diesel, I
18 believe, in Virginia Highland.

19 And given that he was a beer drinker, I
20 had invited him to come and meet the guys and some
21 of the supporters that we had. Some of the sponsors
22 of the team were also going to be present at the
23 fundraising event.

24 Q. And did he come to that event?

25 A. He had indicated he would be there, and

GERALD BOSTOCK
BOSTOCK V. CLAYTON COUNTY

October 14, 2021
221

1 then he never mentioned it again and did not show.

2 Q. Okay. Did you ever find out why he did not
3 show?

4 A. No.

5 Q. Okay. Did you and Judge Teske ever discuss
6 HSL at any other time?

7 A. As I recall, that was the only time that I
8 -- I was letting him know that I had joined and that
9 we were going to be involved with the team as a
10 sponsor, and, again, the benefits of -- for
11 recruitment, training, and retention.

12 Q. Did he say anything during that
13 conversation to discourage you?

14 A. I don't really recall him having much
15 response to me at all, and he just basically walked
16 off in -- which was, again, very unlike him --

17 Q. Mm-hmm.

18 A. -- in past years.

19 Q. Okay.

20 You don't have any reason to believe that
21 he became aware of the HSL sponsorship before that
22 conversation; do you?

23 MR. MEW: Object to form.

24 THE WITNESS: I don't know.

25 BY MR. HILL:

1 Q. Okay.

2 So what about Colin Slay? What -- when do
3 you think -- when do you believe he became aware of
4 the softball team sponsorship?

5 A. I really don't have any clue.

6 Q. Okay. What did you observe from him as far
7 as attitude change that you discussed earlier?

8 A. Again, difference in personality. A little
9 more short with responses during conversations, very
10 little to none as far as socialization, very
11 business-oriented, and somewhat avoidance, I would
12 say.

13 Q. Like, if you were coming down the hall,
14 would he turn around and go the other way?

15 A. Yeah, perhaps. Whereas, in the past, we
16 would come up and speak to each other.

17 Q. Okay. What about John Johnson?

18 A. Same response to that question --

19 Q. Okay.

20 A. -- as it relates to him.

21 Q. Do you have any idea when he became aware
22 of the HSL sponsorship?

23 A. I have no idea.

24 Q. Okay.

25 If any of these individuals -- Slay,

GERALD BOSTOCK
BOSTOCK V. CLAYTON COUNTY

October 14, 2021
223

1 Teske, Johnson, if any of them said that they
2 learned of the HSL sponsorship as a result of the
3 audit, do you have any reason to dispute that?

4 MR. MEW: Object to form.

5 THE WITNESS: With -- with Steve Teske,
6 most definitely because, again, I made him
7 aware.

8 BY MR. HILL:

9 Q. Okay. Around end of March or beginning of
10 April is what you said; right?

11 A. That is correct.

12 Q. Okay.

13 Did you ever think that the termination
14 just had to do with the fact that you spent
15 court-assessed fees on a softball team, gay or not?

16 A. No, I very clearly felt it was a
17 homophobic reaction to me participating in a gay
18 recreational league and taking the opportunity by
19 being a member to help people better understand the
20 needs of child abuse and neglect victims, to educate
21 them, to recruit them, hopefully, eventually, as a
22 full-scale sworn-in volunteer.

23 But on whatever level, whether it be a
24 CASA guardian that would help with mentoring a lot
25 of our children and help us with projects, or

GERALD BOSTOCK
BOSTOCK V. CLAYTON COUNTY

October 14, 2021
224

1 whether it be a sponsor or a donor to ensure that we
2 did have that continued influx of money that could
3 go toward recruitment, training, and retention.

4 Q. You don't know of anyone else in the
5 county who used court-assessed fees for a
6 recreational activity that they participated in; do
7 you?

8 MR. MEW: Object to form.

9 THE WITNESS: I have no idea. I don't -- I
10 don't know.

11 BY MR. HILL:

12 Q. Okay. Do you ever think that you were
13 terminated because of your prostate cancer
14 diagnosis?

15 A. No, I still stand that I was discriminated
16 against based on my sexual orientation.

17 Q. Those facts that you recited in that
18 video, if you replaced gay with prostate cancer, it
19 would say, I'm Gerald Bostock, and I was fired
20 because I developed prostate cancer. For ten years,
21 I had a glowing record. And then I was diagnosed
22 with prostate cancer, and that's when things
23 changed. Within six months, I was fired.

24 I mean, those would all be true
25 statements; right?

1 MR. MEW: Object to form.

2 THE WITNESS: What was discussed in that
3 video and that I shared about my story was an
4 act of discrimination based on my sexual
5 orientation. My diagnosis of prostate cancer
6 was in 2012.

7 BY MR. HILL:

8 Q. Okay. Were you not fired within six months
9 of beating prostate cancer?

10 A. I was still in recovery.

11 Q. Oh. I understood from the video you joined
12 the softball team after beating prostate cancer; was
13 that not right?

14 A. I was still in recovery.

15 Q. Okay.

16 But you would agree that just because you
17 got prostate cancer before your termination, that
18 does not necessarily mean that the prostate cancer
19 was the cause of the termination; right?

20 MR. MEW: Object to form.

21 THE WITNESS: I felt supported during my
22 prostate cancer treatment and early part of
23 recovery. But again, I absolutely stand by a
24 homophobic action that occurred by me being
25 terminated based on my sexual orientation.

1 BY MR. HILL:

2 Q. Okay.

3 So you do not believe that it is just as
4 plausible to say you were terminated because of
5 becoming a cancer patient as to say you were
6 terminated because of being a gay man; right?

7 A. Well, in looking back at my performance
8 reviews, it's clearly after I joined the Hotlanta
9 Softball League that I was terminated.

10 Q. Did anyone, not just meaning a court
11 employee, anyone, ever tell you that they understood
12 that -- you to be alleging that the county
13 discovered your sexual orientation when you joined
14 the softball team?

15 MR. MEW: Object to form.

16 THE WITNESS: And can you reask that
17 question?

18 BY MR. HILL:

19 Q. If I can -- okay.

20 What I was saying earlier- is after
21 watching that video -- and I'll say -- and it seemed
22 like an objective observer would say, his employer
23 learned about his sexual orientation once he joined
24 the softball league.

25 Did anyone ever tell you that that's how

GERALD BOSTOCK
BOSTOCK V. CLAYTON COUNTY

October 14, 2021
227

1 they interpreted that video or any of the other
2 interviews you gave?

3 A. No, not that I recall. Most people that
4 were aware were very upset.

5 Q. We talked about Mr. Holland earlier. Do
6 you -- did he not reach out to you and ask, why are
7 you telling people you were fired for being gay? And
8 that your employer found out you were gay because
9 you joined the gay softball league?

10 A. Mr. Holland did send me a -- it was either
11 a text or an e-mail. I believe it was maybe a text.
12 And for me, therapeutically, I jotted down a
13 response, but then I immediately tore that response
14 up and did not respond to Mr. Holland.

15 Q. Okay.

16 A. And if I may, I believe that was during
17 the time period that the EEOC had their open
18 investigation, and I was not going to jeopardize my
19 EEOC case by speaking with Mr. Holland about the
20 case.

21 Q. Had you made any public statements about
22 your termination while the EEOC had its
23 investigation going on?

24 A. No, not that I recall.

25 Q. So what would Mr. Holland have been

1 referring to?

2 A. That I don't know.

3 Q. Okay.

4 So you had not made any public statements
5 at the time, and Mr. Holland texted you out -- out
6 of the blue, why are you telling people that your
7 employer found out you were gay when you joined the
8 softball league; is that what you're saying?

9 A. What I'm saying is, that I don't recall
10 making any public statements about my termination so
11 as to not jeopardize my EEOC case.

12 Q. Okay. So you don't know why Mr. Holland
13 sent you that text that you're referring to?

14 A. I do not.

15 Q. Okay. Do you still have that text?

16 A. I do not believe so.

17 Q. What happened to it?

18 A. When I tore up my response, I'm sure I
19 deleted it.

20 Q. Okay.

21 A. He was also deleted off of my Facebook
22 page.

23 Q. Just while we have the video up, there was
24 a picture in the video of a -- what looks like a
25 softball team.

GERALD BOSTOCK
BOSTOCK V. CLAYTON COUNTY

October 14, 2021
229

1 A. That is.

2 Q. Is this the Honey Badgers Softball Team
3 that you were a part of?

4 A. No, that's actually when I played with the
5 SSL during fall ball. That's the Heretic Havoc.

6 Q. Got it. Oh, I do see it says Havoc. Okay.
7 Were any of these individuals on the Honey
8 Badgers Team, besides yourself?

9 MR. MEW: Is this an exhibit?

10 MR. HILL: It's part of that video. It's
11 like a freeze-frame from the video, yeah.

12 THE WITNESS: This guy here, back row,
13 second to my right, started with the Honey
14 Badgers, and then he left. I think this guy --
15 this guy here. I don't recall his name.

16 BY MR. HILL:

17 Q. Okay.

18 A. This guy occasionally may have subbed in
19 -- played if we had a player out.

20 Q. Okay. So just for the -- for -- yeah, so
21 -- so I can make it clear for the record, what we're
22 referring to is a freeze-frame from that video that
23 was marked as Exhibit 11. And so, you were
24 identifying the gentleman three in from the right
25 and two in from the right?

GERALD BOSTOCK
BOSTOCK V. CLAYTON COUNTY

October 14, 2021
230

1 A. Yeah, this gentleman here --

2 Q. Okay.

3 A. -- with the mustache.

4 MR. MEW: Is there a time stamp on the
5 freeze frame, just for purposes of the record?

6 MR. HILL: Yes, 31 seconds.

7 BY MR. HILL:

8 Q. Okay. And you don't remember their names?

9 A. This -- I know his name, Patrick Hanson.

10 Q. Okay. But you don't remember the man three
11 -- three in from the right? You don't --

12 A. I don't -- I don't remember his name.

13 Q. Okay. And none of these other people
14 played on the Honey Badgers Team?

15 A. This one in the middle, after I left the
16 Honey Badgers, he joined the Honey Badgers, but it
17 was after.

18 Q. Okay.

19 A. So that would have been after I was
20 terminated.

21 Q. Okay.

22 At the time you gave this interview to
23 CBS, you knew it was going to be broadcast on
24 national TV; correct?

25 A. I assumed it would be if the -- if CBS

GERALD BOSTOCK
BOSTOCK V. CLAYTON COUNTY

October 14, 2021
231

1 actually covered the story, yes.

2 Q. And you also knew at the time that it very
3 likely would be on the internet for the entire world
4 -- world to see; correct?

5 MR. MEW: Object to form.

6 THE WITNESS: I assumed that, yes.

7 BY MR. HILL:

8 Q. You knew at the time that you gave this
9 interview that there was a very good chance it'd be
10 seen by people you used to work with at the
11 courthouse; right?

12 A. That's reasonable.

13 Q. In giving this interview, would you be
14 trying to influence potential witnesses in this case
15 before it proceeded into discovery?

16 MR. MEW: Object to form.

17 THE WITNESS: That was not my intent.

18 BY MR. HILL:

19 Q. Do you contend in this lawsuit that if you
20 had used the GLA funds to sponsor a softball team
21 that was not a gay softball team that you would not
22 have been terminated?

23 MR. MEW: Object to form.

24 THE WITNESS: Yes.

25 BY MR. HILL:

GERALD BOSTOCK
BOSTOCK V. CLAYTON COUNTY

October 14, 2021
232

1 Q. And why do you believe that?

2 A. Because I think it would have been viewed
3 differently. The discriminatory act was that my
4 sexual orientation joining a gay softball league,
5 including and inviting members from the gay
6 community to become CASA volunteers, sponsors, or
7 donors, did not sit well with Clayton County
8 administration or the juvenile court.

9 Q. But this is based on your perception;
10 correct?

11 MR. MEW: Object to form.

12 THE WITNESS: It's based on my belief.

13 BY MR. HILL:

14 Q. Okay.

15 You're not saying the outcome would have
16 been different if it had been a female employee in
17 your position who had used GAL funds to sponsor a
18 women's softball team; do you?

19 MR. MEW: Objection. Same objection.

20 THE WITNESS: If it were a gay female
21 softball team and gay softball league, I think
22 it would have had the same outcome.

23 BY MR. HILL:

24 Q. Okay. But not if it were not a gay women's
25 softball league?

1 MR. MEW: Same objection.

2 THE WITNESS: Most likely not.

3 MR. MEW: Hey, Michael?

4 MR. HILL: Mm-hmm.

5 MR. MEW: We're an hour -- about an hour
6 in from when we started. I -- I got to take a
7 bathroom break. I'm sorry, man.

8 MR. HILL: We can take a break.

9 MR. MEW: All right.

10 MR. HILL: Okay. Let's go off the record.

11 MR. MEW: I put myself on the record
12 there, but I got to --

13 THE VIDEOGRAPHER: The time is 4:27. We
14 are going off the video record.

15 (A break was taken.)

16 THE VIDEOGRAPHER: 4:43, we are back on
17 the video record.

18 BY MR. HILL:

19 Q. Okay.

20 Mr. Bostock, we were just talking about
21 the HSL sponsorship. Apart from getting the logo on
22 the jersey -- sorry -- not jerseys.

23 Apart from getting the logo on the shirts
24 and the banner, what else did the -- would the
25 sponsorship have been used for?

1 A. Possibly to supplement the water supply.

2 Q. Okay. Would it have covered, like,
3 registration fees for the team?

4 A. No.

5 Q. Okay. Or any, like, activity fees or any
6 kind of fees for the individual players?

7 A. No.

8 Q. Okay. Did it cover the cost of the
9 uniforms?

10 A. No.

11 Q. How many games do you think you played
12 with the Honey Badgers at that time?

13 A. Right off, I can't recall. It was -- I
14 played the full season with them, including
15 tournament play.

16 Q. How frequently was there a game?

17 A. Every weekend.

18 Q. Okay. So you think every weekend from,
19 like -- scratch that.

20 When did the season start?

21 A. Around the end of March.

22 Q. Okay.

23 A. Maybe early April, but it seems like to me
24 it was more like end of March. And it usually
25 started off with some tournament plays around the

1 country. And then it ran through possibly August,
2 September when the World Series would occur.

3 Q. Okay. So at least from a -- you think from
4 the end of March, through your termination, you
5 played a game every weekend?

6 A. With a couple of exceptions like Mother --
7 Mother's Day or Easter.

8 Q. Okay. What -- at what fields did you all
9 play?

10 A. During the HSL season --

11 Q. Mm-hmm.

12 A. -- we played at a park. And I forget the
13 name of the park, but it was out by Six Flags.

14 Q. Okay. Were all the games out there?

15 A. Yes.

16 Q. Okay.

17 A. For HSL.

18 Q. For HSL. Right. Yeah.

19 Were there any practices in addition to
20 games?

21 A. Yes, every Saturday.

22 Q. Okay.

23 A. The games were on Sunday.

24 Q. Where were the practices held?

25 A. Those occurred in various locations. It

GERALD BOSTOCK
BOSTOCK V. CLAYTON COUNTY

October 14, 2021
236

1 would be dependent on where the team could find
2 available fields.

3 Q. Okay. Were they ever in Clayton County?

4 A. I don't recall a practice in Clayton
5 County, but I do recall maybe one practice in East
6 Point or College Park.

7 Q. Okay. And you're saying that would be,
8 like, the closest to Clayton County that you can
9 recall?

10 A. That I can recall.

11 Q. Got it.

12 Would you ever go out, like, after a game
13 or after a practice with other teammates to a bar or
14 restaurant or anything like that for, like, drinks
15 afterwards?

16 A. Yeah, I think that would be a pretty
17 common thing to happen.

18 Q. Okay.

19 Would you ever use GAL funds to pay for
20 drinks or appetizers or anything at one of these
21 after-game, after-practice gatherings?

22 A. No.

23 Q. Okay. Would you not use it because you
24 don't think that would be an appropriate use of the
25 GAL funds?

GERALD BOSTOCK
BOSTOCK V. CLAYTON COUNTY

October 14, 2021
237

1 MR. MEW: Object to form.

2 THE WITNESS: I used it because I was on
3 my personal -- I used my own personal monies
4 because I considered myself on personal time.

5 BY MR. HILL:

6 Q. Okay.

7 A. So play -- just to that point, playing on
8 the HSL Softball Team, also, did have a personal
9 benefit to you, as well; right?

10 MR. MEW: Object to form.

11 THE WITNESS: I would say yes because the
12 reason I joined was to prove that I could do it
13 both physically and mentally after going
14 through my treatments and being in recovery.

15 But as I did with every aspect of my life,
16 if I had the opportunity to talk about CASA, I
17 jumped on it, whether it was with family,
18 friends, or with complete strangers. It didn't
19 matter to me. If I could recruit and bring more
20 people into the program, I was willing to do
21 it.

22 BY MR. HILL:

23 Q. Okay. But playing softball is fun; right?

24 A. Absolutely.

25 Q. Okay. I'll show you what I'm marking as

1 Defendant's Exhibit 12.

2 Oh, sorry. Before I move on to exhibits,
3 where were tournaments played?

4 A. There was a tournament I played in, in
5 Birmingham. There was also a tournament that I
6 participated in, in Nashville. There were other
7 tournaments around the country, but those are the
8 only two that I recall that my team went to.

9 Q. Okay.

10 And so the Birmingham one and the
11 Nashville ones, you went to both of those while you
12 were still working for Clayton County; right?

13 A. Yes.

14 Q. Okay. Okay. I'll move to Defendant's
15 Exhibit 12. And you've seen this document before;
16 correct?

17 A. Yes.

18 (Exhibit Number 12 marked for
19 identification.)

20 BY MR. HILL:

21 Q. Okay.

22 This is a memo to you from Colin Slay back
23 in July 2010. And it starts off saying, "As you are
24 aware, a complaint was filed against you." Do you
25 see that?

GERALD BOSTOCK
BOSTOCK V. CLAYTON COUNTY

October 14, 2021
239

1 A. I do.

2 Q. Do you know who filed a complaint against
3 you?

4 A. I do not recall.

5 Q. Okay.

6 Do you -- you can take a second to look it
7 over if you need to, but do you remember, generally,
8 this whole issue about the Summerfest Event in -- in
9 the summer of 2010?

10 A. Basically, yes.

11 Q. And what is Summerfest?

12 A. Summerfest was a community event that was
13 held in Morrow. And for this particular year, it was
14 held at what was called Olde Towne Morrow, which was
15 a development right beside the Southlake Mall area.
16 And it had -- it looked like an old town with
17 businesses in those structures that -- that look old
18 houses and old buildings.

19 And it was a chance for organizations to
20 come out and highlight what kind of work they do. It
21 also provided entertainment for the community. I --
22 there may have been bands that played and, like, a
23 food truck area or something to that effect.

24 Q. Okay. So it was not just a FCCC event?

25 A. No, it was a -- a community event by the

1 City of Morrow I -- I believe.

2 Q. Okay. Did Friends of Clayton County CASA
3 have, like, a booth or something there?

4 A. We did.

5 Q. You did. Okay.

6 So would money have been raised at
7 Summerfest that would have gone into the -- the
8 board account?

9 A. I don't recall if any actual funds were
10 raised other than Duck Derby tickets because we were
11 selling the Duck Derby tickets.

12 Q. Okay.

13 A. And for the car giveaway, the -- the car
14 was present with signage. I do know that -- that I
15 personally secured some sponsorships from businesses
16 that attended the event.

17 Q. Okay. Did you ever talk with Colin Slay
18 about this memo after you received it?

19 A. I don't recall. I know we had a group
20 meeting which included my staff, but I can't
21 remember if this was afterwards or -- I -- I just
22 don't recall exactly.

23 Q. Okay.

24 In this first bullet point on that first
25 page, it starts off saying that several

1 staff-related they felt set up by you. "Waiting
2 until Monday to address their performance at
3 Saturday's event."

4 Did -- do you believe that's a fair
5 statement of what you were doing?

6 A. I do not believe that's a fair statement.

7 Q. Okay.

8 Do you know what they're talking about?
9 Was there something that happened on Saturday, and
10 then you addressed it on Monday, and people seemed
11 to have gotten -- gotten mad about that? Do you
12 remember this at all?

13 A. What I recall is, we had a booth. And,
14 again, the vehicle was present. And probably three
15 to four, maybe even five board members were also
16 present. And my staff that had attended, they had
17 brought coolers, which is appropriate. It was hot,
18 and they had beverages in -- in the coolers.

19 And they had set up a tent. And they were
20 sitting under the tent talking, laughing, and
21 joking. And my board members and myself, we were out
22 in the crowd recruiting, trying to retain sponsors
23 that were there.

24 Q. Mm-hmm.

25 A. And I believe at least once I mentioned

GERALD BOSTOCK
BOSTOCK V. CLAYTON COUNTY

October 14, 2021
242

1 something to the staff about assisting, especially
2 given that the -- the board members were out in the
3 sun on their own time trying to promote the Duck
4 Derby and to help with CASA awareness.

5 I don't recall -- maybe one or two staff
6 got up and walked around for a moment or two, and
7 then it became another social activity under the
8 tent.

9 So Monday morning, when it rolled around,
10 I thought I would use it as a training opportunity
11 with my staff. And I waited to see who was going to
12 submit for basically comped time --

13 Q. Mm-hmm.

14 A. -- for those hours on Saturday. And pretty
15 much all the staff that attended submitted their
16 request.

17 So I called them in individually, and I
18 just asked them very calmly. There was -- you know,
19 it -- it was not a heated discussion with any of my
20 staff. But I wanted to know what they felt they had
21 contributed on Saturday.

22 Q. Okay.

23 A. Basically, they stumbled around and were
24 unable to provide anything. So I said, well, let me
25 give you an example of what I did on Saturday. So I

1 referenced the sponsors that I had --

2 Q. Mm-hmm.

3 A. And I believe it was two that I had gotten
4 signed commitments on. There were also Duck Derby
5 Ticket sales that I had -- had brought in. And none
6 of the other staff were able to do that. They still
7 got their comped time, and then I was hit with this
8 information.

9 Q. Okay.

10 And under the second bullet point where it
11 says that several staff felt that your approach to
12 the follow-up meetings was confrontational, and some
13 even complained unprofessional, I'm assuming you
14 would disagree.

15 You do not think that your approach would
16 have been confrontational or unprofessional; do you?

17 A. I completely disagree.

18 Q. Okay.

19 And Colin Slay, I believe he even states
20 in here, in the second paragraph, that despite these
21 complaints, he looked over everything and believed
22 you didn't do anything wrong; right?

23 A. As I recall, yes.

24 Q. Yeah.

25 This third bullet point on the second page

1 says something about forcing staff to participate in
2 after-hours events. Did you force staff to
3 participate in after-hours events?

4 A. I did not. They were encouraged to
5 participate.

6 Q. Okay. These after-hour events, would they
7 have been FCCC board events?

8 A. Probably only if it were related to Duck
9 Derby.

10 Q. Okay. But you did not force Clayton County
11 CASA staff to participate in Duck Derby?

12 A. They were encouraged.

13 MR. HILL: Okay. Are we on 13 right now?

14 THE COURT REPORTER: Yes.

15 BY MR. HILL:

16 Q. Okay. I'll show you what I'm marking as
17 Defendant's Exhibit 13. Okay. Okay.

18 There's another memo to you, dated
19 November 11th, 2010, from John Johnson and Colin
20 Slay. Have you seen this before?

21 A. It looks familiar, yes.

22 (Exhibit Number 13 marked for
23 identification.)

24 BY MR. HILL:

25 Q. Okay.

1 And so that's the first two pages. And
2 then attached to it at Bates Stamp Clayton-248
3 through 253, it looks like some minutes from a CASA
4 staff meeting on November 9th, 2010. Have you seen
5 this before?

6 A. Yes.

7 Q. Okay.

8 This very first sentence on the memo says,
9 "Keep in mind that your employees are building a
10 case for a hostile work environment."

11 Do you have an understanding of what
12 hostile work environment means?

13 MR. MEW: Object to form.

14 THE WITNESS: I do have a basic
15 understanding, yes.

16 BY MR. HILL:

17 Q. What's your understanding of that term?

18 A. That somebody in authority, usually, might
19 conduct themselves in a manner which an employee
20 feels to be hostile or turbulent.

21 Q. In, I think, the fourth sentence, still in
22 Number 1, "Employees do not have to work within this
23 type of environment. And it is only a matter of time
24 before they will act upon this concern in a way that
25 is beyond our control."

1 Do you have any idea what that sentence
2 means?

3 A. Not really, I suppose.

4 Q. Do you think that John Johnson and Colin
5 Slay were concerned that members of your staff might
6 go to the EEOC or file a lawsuit or do any --
7 something like that?

8 MR. MEW: Object to form.

9 THE WITNESS: I can't answer that. I don't
10 know.

11 BY MR. HILL:

12 Q. Okay. You don't believe that you were
13 creating a hostile work environment; do you?

14 A. I do not. I -- I believe I had a certain
15 expectation of work ethic. You come to work to
16 perform your duties as written in your job
17 description or as other duties assigned. It's not a
18 social time to visit with friends and -- and -- and
19 not conduct the work.

20 Q. Okay.

21 Under Number 4, it says something about
22 Shawn having made statements that -- of having a
23 target on his back. Is this talking about Shawn
24 Black?

25 A. Yes.

1 Q. Okay. Did you have a target on his back?

2 A. I -- I absolutely did not have a target on
3 his back.

4 Q. Also, in this Number 4, it says that he's
5 -- let me just read it.

6 "Remain aware of the statements that Shawn
7 has made of having a target on his back, working in
8 a hostile environment, that you are concerned with
9 what he is doing 24 hours a day and with his
10 personal life, that other staff are being warned
11 about associating with him."

12 So were you concerned about what he was
13 doing in his personal life?

14 A. No, and I would say that's a false
15 statement. He did live up the street from my home,
16 and I usually did not even go that direction when I
17 was leaving my property. I went the other way.

18 Q. Did you do that deliberately so you would
19 not have to interact with him?

20 A. Mm-hmm.

21 Q. Okay. Did you warn other staff against
22 associating with Shawn Black?

23 A. No.

24 Q. These CASA staff meeting minutes that are
25 attached from Clayton-248 to 253 --

1 A. Mm-hmm.

2 Q. -- to the best of your recollection, is
3 this an accurate reflection of what was discussed
4 during this meeting?

5 MR. MEW: Take time to review them if you
6 need to --

7 MR. HILL: Sure.

8 MR. MEW: -- Mr. Bostock.

9 THE WITNESS: This appear -- appears to be
10 what I recall from the meeting.

11 BY MR. HILL:

12 Q. Okay. If you turn to where it says Page 4
13 of 6 at the top. Okay. Sorry about that. Page 5 of
14 6. Sorry.

15 A. All right.

16 Q. You have the next page. It looks like
17 there's a section talking about your comments. Do
18 you see a Number 1 in the middle where it says,
19 "Needed to keep an eye on Shawn?" Do you see that?

20 A. Yes.

21 Q. Did you -- did you say that during the
22 meeting that you needed to keep an eye on Shawn?

23 A. I believe that was in context to his
24 complaint that he was not able to move into an
25 office space in the old juvenile court building that

1 had a window. And I had expressed concern about some
2 of his activities, or lack thereof, while he was on
3 the clock. And so that's what I recall about that --

4 Q. Okay.

5 A. -- statement.

6 Q. Is it fair to say you did not trust Shawn
7 Black?

8 A. Initially, I did. He started with the
9 program as a volunteer and then applied for a
10 position when it became available. But as he took on
11 the responsibilities, there began to be concerned
12 about his work performance.

13 Q. Okay. So at some point, did you lose trust
14 in him?

15 A. Pretty much.

16 Q. In your opinion, is he still not a
17 trustworthy individual?

18 MR. MEW: Object to form.

19 THE WITNESS: I haven't had any contact
20 with him since he left the juvenile court.

21 BY MR. HILL:

22 Q. Okay. But the last contact -- at the time
23 of the last -- well, strike that.

24 When was the last time you had contact
25 with him?

1 A. When his grant-funded position basically
2 expired, and the county was not able to shift monies
3 into -- or allocate funds to keep that position
4 going.

5 Q. Would that be around January 2013?

6 A. No, I think it was before that.

7 Q. Would it have been like the end of 2012?

8 A. I honestly can't remember.

9 Q. Okay. But somewhere around that time,
10 roughly?

11 A. I -- I don't recall.

12 Q. Okay.

13 So at -- whenever it was, at the time of
14 your last contact with Shawn Black, did you consider
15 him to be a credible person?

16 A. No.

17 Q. Okay. Why not?

18 A. Based on his behaviors and actions while
19 he was still employed, I.E., lying about where he
20 was, saying he was one place, but actually somewhere
21 else, saying he was at meetings that never existed,
22 and never was able to give an explanation as to
23 where he was.

24 I would occasionally come in unannounced
25 and -- and find, again, social hour going on in the

1 offices.

2 Q. Okay. Did you ever write him up for any of
3 these behaviors?

4 A. He was evaluated on the performance
5 process that the county had.

6 Q. Okay. And were these behaviors that you
7 mentioned brought up during that evaluation?

8 A. Yes, I believe so.

9 Q. Okay. Did you terminate Shawn Black?

10 A. He technically was terminated. I did not
11 terminate him. Again, his grant-funded position had
12 completed its grant cycle. And that -- as I recall,
13 that grant was not being renewed.

14 So we did go to the county commissioners
15 to request an allocation to keep the position moving
16 forward. And as I recall, our request had been
17 denied.

18 Q. Okay. If the request had been approved,
19 would you have kept him employed?

20 MR. MEW: Object to form.

21 THE WITNESS: Most likely, unless his
22 performance reviews continued to drop.

23 BY MR. HILL:

24 Q. I'll show you what I'm marking as
25 Defendant's Exhibit 14.

1 members of your staff?

2 A. I don't recall any, no. And I don't see a
3 signature page where I would have signed this.

4 Q. Yeah, do you remember seeing this before
5 at all?

6 A. It doesn't stand out to me, no.

7 Q. Okay.

8 A. If I may, though?

9 Q. Yes.

10 A. I do note on Page 2 the score of 48 out of
11 50.

12 Q. Page 2. Okay.

13 So despite these negative comments, you
14 got an overall favorable review from your
15 supervisors; right?

16 MR. MEW: Object to form.

17 THE WITNESS: In looking at the scoring
18 mechanism, I received 48 out of 50.

19 BY MR. HILL:

20 Q. Right. That's a good review; right?
21 Overall?

22 A. Yes, it is. I -- I've seen other reviews
23 for other people that were employed by Newman --
24 like, the county assigned to juvenile court, and
25 their scores were much less than that.

1 Q. Okay.

2 Would you agree that just because some
3 employees complain about a supervisor doesn't
4 necessarily mean that the supervisor is doing
5 anything wrong?

6 MR. MEW: Object to form.

7 THE WITNESS: I think that's very
8 reasonable.

9 BY MR. HILL:

10 Q. I'll show you what I'm marking as
11 Defendant's Exhibit 15. This appears to be a
12 counseling form, Bates-stamped Clayton-539 to 540,
13 dated May 2012. You've seen this before?

14 A. I would have to say yes because that's my
15 writing that I am not willing to sign this general
16 counseling form.

17 (Exhibit Number 15 marked for
18 identification.)

19 BY MR. HILL:

20 Q. Why were you not willing to sign the
21 general counseling form?

22 A. Because I disagreed with the content.

23 Q. Okay.

24 It says in here under Number 1 that you
25 had submitted a request to terminate an employee

1 without taking the proper steps; is that a true
2 statement?

3 A. I don't recall that.

4 Q. Okay. So you don't recall what employee is
5 being discussed here?

6 A. No, I don't.

7 Q. Okay.

8 With -- Number 2 brings -- the box under
9 Number 2 brings up some complaints from staff in
10 July 2009. It says, "V. Henry, January 2010, S.
11 Black." And then, "July 2010, Summerfest," which I
12 think we looked at earlier.

13 In these instances, when employees had
14 made complaints about you, do you think they were
15 being untruthful about you?

16 MR. MEW: Object to form. Object to form.

17 THE WITNESS: I think there was a lot of
18 untruth (sic), and I think there was a lot of
19 over-exaggeration on their part.

20 BY MR. HILL:

21 Q. Do you believe some of the staff members
22 may have misunderstood the reasoning behind your
23 actions?

24 A. Oh, I don't --

25 MR. MEW: Object to form.

1 THE WITNESS: I don't -- I don't know.

2 BY MR. HILL:

3 Q. Okay.

4 Do you remember what -- these complaints
5 from staff in July 2009, referring to V. Henry, do
6 you know what that's about?

7 A. As I recall, that was the result of an
8 incident where I was not on property, and he got
9 into a confrontation with Concilia Chillumuna. And
10 Ms. Chillumuna reported the incident to me, and
11 consequently, Mr. Henry was written up.

12 Q. Okay. In that incident, you don't think
13 you did anything inappropriate in that circumstance;
14 do you?

15 A. No.

16 Q. Okay.

17 Was there an incident, at some point in
18 your employment, where someone reported that you had
19 photographs of nude people on your work computer?

20 A. I do recall a conversation about that, and
21 I also recall that the person that allegedly claimed
22 that was another disgruntled employee that was
23 actually hired to be our recruiter and trainer for
24 CASA, which entailed some evening hours because
25 that's when some of our training sessions were held.

1 And he had difficulty with that schedule and
2 routine.

3 And when confronted about it and
4 discussions about it, he ended up just walking in,
5 apparently, one day either over the weekend or at
6 night, and had cleared everything out of his office.
7 And supposedly, he had reported just prior to doing
8 that that he had found photographs.

9 I found him in my office at my computer,
10 which I found very odd, which caused me to suspect
11 possible foul play, as I recall it.

12 Q. What was his name?

13 A. David Santiago.

14 Q. And he was a recruiter and trainer?

15 A. He was the CASA volunteer recruiter --

16 Q. Okay.

17 A. -- and trainer.

18 Q. That's the same position that later went
19 to Becky Galbraith; is that right?

20 A. Correct.

21 Q. Okay.

22 Did -- you said suspected foul play. Like,
23 are you saying that you suspected he installed some
24 photographs on your computer?

25 A. I guess I'm suggesting it's possible

1 because he should not have been at my computer.

2 Q. Okay. So were there actually photographs
3 of nude individuals on your computer -- work
4 computer?

5 A. I don't recall that, no.

6 Q. Okay. But that's what -- as far as you
7 recall, that's what David Santiago reported?

8 A. In so many words, I think so, yes.

9 Q. And he reported that to -- to whom did he
10 report that?

11 A. I don't know.

12 Q. Okay. Did John Johnson talk to you about
13 this incident?

14 A. We did have some conversation, yes.

15 Q. Okay. Apart from David Santiago and John
16 Johnson, any -- did you talk with anyone else about
17 this?

18 A. I think Judge Teske may have made a
19 comment.

20 Q. Okay. Do you remember what comment
21 Judge Teske made?

22 A. I don't.

23 Q. Do you recall what year this was?

24 A. No, I'm sorry, I don't.

25 Q. If I said 2011, would that sound kind of

1 right or way off?

2 A. That seems a little off --

3 Q. Okay.

4 A. -- as I recall, but --

5 Q. You think it was earlier?

6 A. Maybe a little earlier.

7 Q. Okay. Did David Santiago report directly
8 to you?

9 A. He did.

10 Q. Were you written up as a result of this
11 allegation?

12 A. No, and there was nothing mentioned in my
13 performance review.

14 Q. Okay.

15 So was it not the case that you were
16 written up, but then there was an agreement to
17 delete the write-up and destroy it as long as the
18 pictures were deleted?

19 A. I recall John Johnson telling me that he
20 kept a file on everyone, and yes, something that he
21 would put in my file. And something about it -- it
22 can go away or something to that effect.

23 Q. Okay.

24 Did you understand this to mean, like, his
25 own personal file, as opposed to, like, personnel

1 file?

2 A. What I can say is, I think most employees
3 at the juvenile court knew that Mr. Johnson kept his
4 own personal files on each of us.

5 Q. Okay. But you never saw anything on -- in
6 writing referring to this?

7 A. Not in my file, no.

8 Q. Okay. Or anywhere else? Did you see
9 anything in writing anywhere else?

10 A. Not that I recall.

11 Q. Okay.

12 Is it true that there were nude
13 photographs found on your computer at the time of
14 your termination?

15 A. I -- I don't know that. I was asked to
16 remove my thing -- my personal belongings, and that
17 was earlier in the day. And I believe --

18 Q. Mm-hmm.

19 A. -- my computer was locked, so I -- I don't
20 know.

21 Q. Did you have nude photographs on your work
22 computer at the time of your termination?

23 A. No.

24 Q. Okay.

25 A. Not that I'm aware of.

1 Q. You'd agree that if someone in management
2 was looking for a reason to get rid of you, they
3 could have done it during any of the times that
4 there were these employee complaints that we just
5 discussed; right?

6 MR. MEW: Object to form.

7 THE WITNESS: What I know is what happened
8 to me, and that was after my performance
9 reviews. Then joining a gay recreational
10 softball league, I was wrongfully terminated.

11 BY MR. HILL:

12 Q. With that termination, is it your belief
13 that someone was looking for a reason to terminate
14 you and then seized upon the gay softball league as
15 a reason to get rid of you?

16 MR. MEW: Object to form.

17 THE WITNESS: I know what I experienced.
18 And I stand by, I was terminated because of my
19 sexual orientation. And then I was being
20 discriminated against because I had joined the
21 gay recreational softball league and was
22 promoting a county program within that league,
23 and also, in and around the Atlanta area,
24 deemed to be gay.

25 BY MR. HILL:

1 Q. Okay. You don't believe that anyone wanted
2 to terminate you before you joined the gay softball
3 league; right?

4 MR. MEW: Object to form.

5 THE WITNESS: Well, we just were looking
6 at my performance reviews. And looking back, 48
7 out of 50. My very last performance review was
8 very similar.

9 BY MR. HILL:

10 Q. Mm-hmm.

11 A. The reviews prior to that, one that you've
12 shared with me, was a 46 out of 50. Again, there
13 were employees with much lower scores.

14 So I think it's fair to say that a person
15 with not even average reviews but good to excellent
16 reviews would be fired after -- in my case, after
17 joining the gay recreational --

18 Q. Mm-hmm.

19 A. -- softball league.

20 Q. Yeah. Okay.

21 All -- all I'm asking, really, is just a
22 -- just as far as what you believe -- if you believe
23 that someone was looking for a reason to get rid of
24 you before you joined this gay softball league.

25 MR. MEW: Same objection.

GERALD BOSTOCK
BOSTOCK V. CLAYTON COUNTY

October 14, 2021
263

1 BY MR. HILL:

2 Q. Do you believe that or not?

3 A. I don't know. I can't answer that.

4 Q. Okay.

5 A. All I can state is -- and testify to is
6 what I experienced and the homophobic action that
7 was taken by Clayton County.

8 Q. Okay. But since you don't know, then it's
9 not your belief; right?

10 MR. MEW: Yeah, object to form. Misstates
11 what he said.

12 BY MR. HILL:

13 Q. Well, I'm just asking him.

14 A. It is my belief that I was discriminated
15 against based on my -- excuse me -- my sexual
16 orientation.

17 Q. Right. No, I get that.

18 All I'm just asking is, is it your belief
19 that someone was looking for a reason to terminate
20 you before you joined the gay softball league?

21 MR. MEW: Asked and answered.

22 THE WITNESS: I can't answer how somebody
23 else thought or -- excuse me.

24 BY MR. HILL:

25 Q. But as far as your -- as far as your

GERALD BOSTOCK
BOSTOCK V. CLAYTON COUNTY

October 14, 2021
264

1 belief, that's not something that you believe in
2 your head right now; right?

3 A. My belief is that --

4 MR. MEW: Objection --

5 THE WITNESS: I was discriminated against

6 --

7 BY MR. HILL:

8 Q. Okay.

9 A. -- based on my sexual orientation.

10 Q. When did you first come to believe that
11 you were terminated because of your sexual
12 orientation?

13 A. About the time of the audit, which would
14 have fallen in the month of April of 2013, and then
15 some of the questions that were being presented to
16 me.

17 Q. So before the termination happened, you
18 believed it was -- that you were going to be
19 terminated; right?

20 A. During that time period, I began to, what
21 I would consider, putting pieces of the puzzle
22 together. And it did feel like -- that the decisions
23 being made about my career with the county were
24 based on my sexual orientation. And since that time,
25 the testimony and some of the documents presented

1 have, to me, verified that belief.

2 Q. I'll show you what I'm marking as
3 Defendant's Exhibit 16. So this is a form with
4 information that you submitted to the department --
5 Georgia Department of Labor; correct?

6 A. Yes, I believe so.

7 (Exhibit Number 16 marked for
8 identification.)

9 BY MR. HILL:

10 Q. And the responses in here, you wrote these
11 yourself; correct?

12 A. Yes.

13 Q. Okay. So all this information is true?

14 A. Yes.

15 Q. Okay.

16 And in this form, you don't say anything
17 about believing you were terminated because of your
18 sexual orientation; do you?

19 A. It's not explicitly listed in this
20 document, no.

21 Q. Okay.

22 After question Number 3, there's a
23 sub-question that says, "If you do not think the
24 above reason was why you were discharged, give the
25 reason you feel you were discharged. Explain in

1 detail."

2 And your response is, "Chief Juvenile
3 Court Judge wanted to have someone else in the
4 position. Was overheard two months ago telling
5 colleague he was going to get rid of me. Performance
6 review was completed in May 2013."

7 A. That is correct.

8 Q. Right.

9 And the person you're referring to,
10 "Because they wanted to have someone else in the
11 position," you're talking about Carol Gossett there;
12 right? That's the someone else?

13 A. That was my belief, yes.

14 Q. Okay. And this -- that sentence I just
15 read, that's based on what Griffin Shirley told you;
16 correct?

17 A. Yes. His --

18 Q. Okay.

19 So he is the person who overheard
20 two months -- no. Sorry.

21 He is the person who allegedly overheard
22 Judge Teske telling someone he was going to get rid
23 of you; right?

24 A. That is correct. He came to me after the
25 golfing tournament.

1 Q. Okay. When did that happen, that he came
2 to you?

3 A. Would have been in April, I think is when
4 that tournament occurred.

5 Q. Okay.

6 And at the time that you filled this out,
7 this was your belief that Judge Teske got rid of you
8 because he wanted to replace you with Carol Gossett;
9 right?

10 MR. MEW: Object to form.

11 THE WITNESS: As part of it, yes.

12 BY MR. HILL:

13 Q. Okay. You still believe today that
14 Judge Teske wanted you out of the position and Carol
15 Gossett in the position?

16 A. Yes, based on not being happy with me
17 participating in the gay recreational softball
18 league and promoting the program within, not only
19 the league but also in what he deemed to be gay
20 Midtown.

21 Q. The reason you don't mention sexual
22 orientation as a reason for your termination in this
23 document is because it would not make sense to say
24 that you were terminated because of your sexual
25 orientation when you're saying that Judge Teske

1 wanted to have someone else in the position who also
2 was gay; right?

3 MR. MEW: Object to form.

4 THE WITNESS: Okay. Bear with me. Can you
5 repeat the question?

6 MR. HILL: Can you read back the question,
7 please?

8 THE COURT REPORTER: The reason you cannot
9 say that the reason for your termination in
10 this document is because it would not make
11 sense to say that your sexual orientation --
12 hold on a second.

13 Let me just -- the reason you do not
14 mention sexual orientation as a reason for your
15 termination in this document is because it
16 would not make sense to say that you were
17 terminated because of your sexual orientation
18 when you are saying that Judge Teske wanted to
19 have someone else in the position who was also
20 gay; right?

21 MR. MEW: Same objection.

22 THE WITNESS: If my memory is correct, I
23 had not secured legal counsel --

24 BY MR. HILL:

25 Q. Mm-hmm.

GERALD BOSTOCK
BOSTOCK V. CLAYTON COUNTY

October 14, 2021
269

1 A. -- on this matter, and my plan was to file
2 with the EEOC.

3 Q. Mm-hmm.

4 A. Therefore, I -- I did not go into any
5 specific detail on this document as I was waiting
6 for legal representation from my attorney.

7 Q. Why would you wait for legal
8 representation before going into detail in this
9 document?

10 A. Because of my belief that I was
11 discriminated against. And although I was familiar
12 with the EEOC, I wasn't completely familiar with all
13 of the options and the -- the terminology of the --
14 the complaint for EEOC.

15 Q. Okay.

16 If -- if an employer terminates an
17 employee who happens to be gay and then replaces
18 that employee with someone else who also is gay,
19 does it really makes sense to say that the person
20 who lost his job, that it's because he was gay?

21 MR. MEW: Object to form.

22 THE WITNESS: Well, considering this
23 individual was a closeted gay and did not have
24 her lifestyle openly displayed, I think factors
25 in, but --

1 BY MR. HILL:

2 Q. Okay.

3 So in this lawsuit, do you contend that
4 you were terminated because you were openly gay and
5 replaced by someone who was not openly gay?

6 MR. MEW: Object to form.

7 THE WITNESS: I contend it's when I joined
8 the Hotlanta Softball League, and yes, started
9 promoting the -- the county program within the
10 league. Specifically, my team, and also what
11 was deemed to be gay Midtown.

12 BY MR. HILL:

13 Q. Okay. But you think the being openly gay
14 is, like, the determinative factor for your
15 termination?

16 MR. MEW: Object to the form.

17 THE WITNESS: I believe what happened to
18 me, and that is I was terminated because of my
19 sexual orientation.

20 BY MR. HILL:

21 Q. Okay. But let me put it this way.

22 Ms. Gossett is white; right?

23 A. Yes.

24 Q. You're white; right?

25 A. Correct.

GERALD BOSTOCK
BOSTOCK V. CLAYTON COUNTY

October 14, 2021
271

1 Q. So if you were saying, I think I was
2 terminated because I was white, that doesn't really
3 make sense; right?

4 MR. MEW: Object to form.

5 BY MR. HILL:

6 Q. Because you're both white; right?

7 A. I can't speculate on that. I'm -- I -- I
8 know and can testify to what had happened to me.

9 Q. Okay.

10 Let's say you had a straight man who lost
11 his job and then got replaced by a straight woman.
12 Would it make sense at all to say that the straight
13 man lost his job because he's straight?

14 MR. MEW: Object to form, speculative.

15 THE WITNESS: Again, I can't speculate. I
16 know what happened to me.

17 BY MR. HILL:

18 Q. Okay.

19 You don't have any reason to believe that
20 Judge Teske has a preference for gay women over gay
21 men; do you?

22 MR. MEW: Same objection.

23 THE WITNESS: I don't know.

24 BY MR. HILL:

25 Q. Okay.

1 I'm going to show you what I'm marking as
2 Defendant's Exhibit 17. This is a document produced
3 to us by the Georgia Department of Labor. Have you
4 seen this before?

5 A. It does not look familiar, no.

6 (Exhibit Number 17 marked for
7 identification.)

8 BY MR. HILL:

9 Q. Okay.

10 Just read that short paragraph for a
11 second. Does it accurately reflect statements that
12 you made to the Department of Labor investigator in
13 the course of your unemployment claim?

14 A. Well, there appears to be a lot of typos
15 in this wording and some mistakes referencing a
16 baseball team.

17 Q. I know it's probably not intended to be,
18 like, an exact transcript. But does it generally
19 reflect accurately what you discussed with the
20 Department of Labor investigator?

21 A. Somewhat, yes. Again, given all the
22 mistakes and discrepancies, I'm -- I'm not convinced
23 this is a very good document, but --

24 Q. The statement at the top where it says, "I
25 used non-profit money." You see where I'm talking

GERALD BOSTOCK
BOSTOCK V. CLAYTON COUNTY

October 14, 2021
273

1 about?

2 A. I do.

3 Q. The GAL funds were not non-profit money;
4 were they?

5 A. Yes, those were FCCC funds.

6 Q. Well, they were service fees assessed by
7 the court; right?

8 MR. MEW: Object to form.

9 THE WITNESS: To be given to FCC (sic) for
10 use of recruitment, training, and retention.

11 BY MR. HILL:

12 Q. Right. FCCC was holding the funds that
13 they were service fees assessed by the court; right?

14 A. They --

15 MR. MEW: Same objection.

16 THE WITNESS: They were assessed by the
17 court and given to the Friends of Clayton
18 County CASA. They did not go through county
19 finance.

20 BY MR. HILL:

21 Q. Okay. They weren't charitable donations,
22 though; were they?

23 A. No, but the FCCC is -- was considered a
24 charitable organization.

25 Q. Near the bottom, maybe a couple sentences

1 up -- four lines up, it says, "I spoke to a board
2 member about the ideal --" I think it should have
3 been deal.

4 "I spoke to a board member about the
5 ideal, and they were okay with it."

6 Talking about Sabrina Crawford as the
7 board member?

8 A. Yes, Sabrina Crawford gave approval, as
9 did Guy Alexander, who was also a board member.

10 Q. Okay. Anybody else on the board who gave
11 approval?

12 A. I don't know.

13 Q. Okay. And they approved it because it
14 wasn't the board's money; right?

15 A. The conversation I recall is they approved
16 it because they thought it was a good idea to have
17 that opportunity to recruit, especially males, in
18 such a large number because the Hotlanta Softball
19 League is like the second largest league in the
20 country.

21 Q. You say in here that the \$250 were given
22 back to the court; is that true?

23 A. That is my understanding. Apparently, the
24 coach for the Honey Badgers contacted the court and
25 said, based on my termination, that they did not

1 want the money, and they wanted it to be returned
2 where it came from.

3 Q. Okay. Did you ever see any documentation
4 produced in discovery in this case showing that \$250
5 being returned?

6 A. I don't recall seeing that, no.

7 Q. Okay. Do you know to which account that
8 \$250 was returned?

9 A. I was terminated. I don't -- I don't know
10 what happened after I left the building.

11 Q. Okay. I'll show you Defendant's
12 Exhibit 18. Have you ever seen this document before?

13 A. I don't believe so.

14 (Exhibit Number 18 marked for
15 identification.)

16 BY MR. HILL:

17 Q. Is that Guy Alexander's signature at the
18 bottom?

19 A. It appears to be, yes.

20 Q. Read over this document. But after you do,
21 it does not say anything about him approving your
22 use of GAL funds for the softball team; does he?

23 A. Not in those words, no.

24 Q. In the fourth paragraph, it sounds like
25 he's saying that you just told him about the

1 softball team and that CASA was helping with the
2 sponsorship; right?

3 MR. MEW: Object to form.

4 THE WITNESS: No, it was a direct ask. As
5 far as his opinion and his thoughts, we had a
6 meeting scheduled because Mr. Alexander was
7 involved in a lot with our program. And he was
8 also involved on the State level with Georgia
9 CASA, sponsoring some of their events.

10 But the company he was with at the time
11 was Crown Distributing. And so I had talked to
12 him about the idea of sponsoring the Hotlanta
13 Softball Team and explained to him the benefits
14 as far as recruitment, retention, and training.
15 And he thought it was a good idea.

16 And he suggested because I was going to
17 use the GAL money, that I also run it by
18 Sabrina Crawford. And if she were in agreement,
19 that he would support that. He did decide not
20 to be a sponsor of the team.

21 But what he did agree to do would be host
22 a reception or a picnic at the end of the
23 season and have -- I could have the guys all
24 get together from the team, and that he would
25 sponsor that event but not as an official

1 sponsor of the team. Mostly because he was
2 already committed to working with Georgia CASA
3 on a project with his company.

4 BY MR. HILL:

5 Q. Did he tell you that's the reason he did
6 not -- that he declined your invitation for Georgia
7 Crown Distributing to sponsor the team?

8 A. As I recall, yes.

9 Q. Because he was already involved in other
10 capacities?

11 A. Seems like that's how the conversation
12 went, yes.

13 MR. MEW: Hey, before you start that
14 exhibit --

15 MR. HILL: Yeah.

16 MR. MEW: -- can we -- I got -- I got to
17 take a little break if that's okay.

18 MR. HILL: You got to cut out the Coke
19 Zeros.

20 MR. MEW: Yeah, you got to cut out the
21 seven-hour depositions. This could all be done.

22 THE VIDEOGRAPHER: The time is 5:44. We
23 are going off the video record now.

24 (A break was taken.)

25 THE VIDEOGRAPHER: The time is 5:59. We

1 are back on the video record.

2 BY MR. HILL:

3 Q. Okay. Mr. Bostock, I'm showing you what
4 I'm marking as Defendant's Exhibit 19. Is this an
5 e-mail you sent to Guy Alexander?

6 (Exhibit Number 19 marked for
7 identification.)

8 MR. BUECHNER: Is that 19, Mike?

9 THE COURT REPORTER: Yes.

10 MR. HILL: Yes, that's 19.

11 THE WITNESS: It appears to be.

12 BY MR. HILL:

13 Q. Okay.

14 A. Yes.

15 Q. I'm going to show you what I'm marking as
16 Defendant's Exhibit 20. Have you ever seen this
17 e-mail before?

18 A. I believe so, during review of the
19 documents -- during -- that you provided during
20 production.

21 (Exhibit Number 20 marked for
22 identification.)

23 BY MR. HILL:

24 Q. Had you ever seen this e-mail before this
25 litigation?

GERALD BOSTOCK
BOSTOCK V. CLAYTON COUNTY

October 14, 2021
279

1 A. No, I had not.

2 Q. No one ever told you about this e-mail
3 when it came in?

4 A. No.

5 Q. Okay. Oh, yeah. This is the same --

6 MR. MEW: The one you handed me was 19.
7 This is 20.

8 MR. BUECHNER: Okay.

9 BY MR. HILL:

10 Q. Are -- the allegations in this circled
11 part at the bottom about how GAL funds were spent,
12 are these allegations true?

13 A. I don't believe them to be true, no.

14 Q. Okay. Do you have any reason to -- strike
15 that.

16 Do you believe Shawn Black is being
17 untruthful with these allegations?

18 A. Yes, and overexaggerating.

19 Q. Okay. Do you have any idea, in your mind,
20 why he would do that?

21 MR. MEW: Object to form.

22 THE WITNESS: I believe his intent behind
23 this was to lash out that he ended up having
24 his position at the court get dissolved because
25 of lack of funding. And I think he took it out

GERALD BOSTOCK
BOSTOCK V. CLAYTON COUNTY

October 14, 2021
280

1 on me purposely, as if it were my fault, that
2 the funding had gone away.

3 BY MR. HILL:

4 Q. You're familiar with the concept of a
5 whistleblower; right?

6 A. Yes.

7 Q. Okay. Would you agree Shawn Black is
8 acting as a whistleblower with this e-mail?

9 MR. MEW: Object to form.

10 THE WITNESS: I believe he's acting as a
11 disgruntled employee.

12 BY MR. HILL:

13 Q. Whether the allegations in this e-mail are
14 true or not, would you agree that the county had a
15 duty at least to look into them to see if they're
16 true?

17 MR. MEW: Object to form.

18 THE WITNESS: Well, no one came to me and
19 talked to me about any of these allegations, so
20 --

21 BY MR. HILL:

22 Q. But would you agree that the county had a
23 duty to look into these allegations to see if
24 there's any truth to them?

25 MR. MEW: Same objection.

1 THE WITNESS: My response to that would
2 be, I don't know. I don't -- I can't respond as
3 to what the county would think or not think.

4 BY MR. HILL:

5 Q. You have no thoughts on the matter --

6 MR. MEW: Object to form.

7 MR. HILL: -- one way or the other?

8 MR. MEW: Object to form.

9 THE WITNESS: No.

10 BY MR. HILL:

11 Q. Okay. You don't believe Shawn Black had an
12 issue with you because of your sexual orientation;
13 do you?

14 A. As I've stated, I think his attitude
15 towards me was because he lost his position due to
16 lack of funding.

17 Q. Other than what we've discussed in this
18 deposition today about Shawn Black, were there any
19 other sources of, like, friction between you two?

20 A. Not that I'm aware of, no.

21 Q. Okay.

22 A. And that's evidenced by, I was invited to
23 participate in a garage sale that he had at his
24 residence prior to him being terminated. And some of
25 the other CASA staff also participated.

1 I also had received an e-mail from
2 Mr. Black before his termination that it was
3 somebody's birthday. I don't recall if it was Becky
4 Galbraith's birthday or if it was his sister's
5 birthday. But he had invited me to catch up with
6 some of them to go out and to have a cocktail.

7 Q. When did you first read the audit report?

8 A. I was not privy to the audit until it was
9 submitted to my legal team.

10 Q. Okay. You never saw it during your
11 employment?

12 A. No, no one showed me the audit or
13 discussed any of the findings with me.

14 Q. Okay. You had an interview, at one point,
15 with Stacey Merritt; is that right?

16 A. That is correct.

17 Q. Was anyone else in that interview?

18 A. I don't recall anyone else, but I want to
19 say there were maybe at least two meetings that I
20 had with Stacey.

21 Q. Okay.

22 A. But again, I -- I only recall meeting with
23 her. And maybe in the second meeting, a second
24 auditor was present.

25 Q. Okay.

1 A. I -- I -- I'm not a hundred percent sure
2 on that, though.

3 Q. Lesley Moore, does that name sound
4 familiar?

5 A. It only sounds familiar because I saw that
6 name as it relates to the audit and --

7 Q. Mm-hmm.

8 A. -- to some of the other audits that I had
9 mentioned where there was poor development and
10 implementation of the grants.

11 Q. The second auditor, was it a -- a black
12 woman?

13 A. I don't recall.

14 Q. Okay. Do you know who Juan Sanchez is?

15 A. Yes, he was the manager of F.R.O.G.S
16 Cantina in Midtown.

17 Q. Is it true that around the time of your
18 termination, you had started a -- got involved in a
19 romantic relationship with Mr. Sanchez?

20 MR. MEW: I'm going to object to that.

21 And, Gerald, I don't want you to answer that
22 question right now. We're not getting into this
23 guy's sex life. His sexual orientation is at
24 issue. Not his romantic life or his sex life or
25 anything else.

1 MR. HILL: What's the base --

2 MR. BUECHNER: I think it's relevant to
3 the -- perfectly relevant -- perfect question
4 because his name has come up in some of the
5 expenses.

6 MR. MEW: Oh, I'm sorry. I thought we were
7 one cowboy, one rodeo. Then I'm bringing in my
8 cowboy, too then. I think that the -- I think
9 that the answer is that none of that has to do
10 with anything.

11 The case is about whether he was
12 discriminated against based on his sexual
13 orientation. It's not about his personal life,
14 who he did or didn't date, or anything else.

15 MR. HILL: There was a lot of testimony
16 during Judge Teske's deposition that he
17 believed some of the expenses were personal
18 social outings and possibly even, like,
19 romantic dates. There was -- that was -- you
20 guys spent a long time on that.

21 MR. MEW: Yeah, but that's his --

22 MR. HILL: So if that's --

23 MR. MEW: -- prejudicial assumption that
24 because Gerald's gay, he must be visiting old
25 boyfriends. He couldn't identify anyone in his

1 testimony that had anything to do with that.

2 MR. HILL: Well -- so I can ask him about

3 --

4 MR. BUCKLEY: We're going to have to do it
5 in front of the court.

6 MR. HILL: -- that, though.

7 MR. BUCKLEY: We are not going to --

8 MR. HILL: Are you serious?

9 MR. BUCKLEY: Yeah, we are not -- he is
10 not going to testify about his sex life; okay?
11 So if you want to ask him a question about his
12 sex life or romantic life or anything like
13 that, he's going to have an instruction not to
14 answer the question.

15 MR. HILL: It goes directly to why there
16 would have been some expenses --

17 MR. BUCKLEY: You're assuming that --

18 MR. HILL: -- at this place.

19 MR. BUCKLEY: -- because he's gay, that he
20 must have been in a romantic relationship with
21 everybody he was having lunch with. And he's
22 not going to testify about who he ever had sex
23 with in his life. He's not --

24 MR. HILL: I'm not asking that. And I'm
25 not making any assumptions. I'm asking him the

1 question.

2 MR. BUCKLEY: Well, I know you're asking
3 him the question. And we are going to give him
4 an instruction and have given an instruction
5 not to answer. Period. Full stop.

6 If you ask again, the same instruction
7 will be given, and he will not testify about
8 that. And if you want to -- to -- you know,
9 take it up with the court.

10 MR. HILL: Well, it's too late to call the
11 judge right now.

12 MR. MEW: Well, if we decide to go down
13 that road, we'll take --

14 MR. BUCKLEY: If you decide to go down
15 that road. But I mean -- but I -- I just think
16 it's -- it's entirely irrelevant. Teske's
17 assumptions are Teske's assumptions, and they
18 speak to Teske's prejudice. But that's not
19 something that's relevant in this case.

20 MR. MEW: And his testimony made it clear
21 he didn't have any basis for those assumptions
22 anyway, so --

23 MR. HILL: Okay. We'll pass that and
24 explore whether to go take it up with the
25 court.

1 BY MR. HILL:

2 Q. We talked about the termination meeting
3 earlier. That was you and Judge -- I mean, you and
4 John Johnson and Colin Slay; correct?

5 A. That is correct.

6 Q. Okay.

7 And I think what you've testified to is,
8 there was a statement that you said, I know what
9 this is about. And John Johnson said, it's not
10 because you're gay; right?

11 A. That is correct.

12 Q. Anything else said at this termination
13 meeting?

14 A. My understanding -- or my memory of that
15 meeting was, at that point, I was actually handed
16 the pink termination slip. And I was told that I was
17 still in possession of a county phone and that I
18 needed to exit the property, and that Mr. Slay would
19 accompany me to the parking lot to retrieve the
20 county phone. And that was the end of the meeting,
21 as I recall.

22 Q. The first job you had after your
23 termination from Clayton County was the Neiman
24 Marcus position; right?

25 A. That is correct. That was about, I think,

1 six months after my termination.

2 Q. What did you do to find other jobs before
3 that position?

4 A. Well, because my unemployment had been
5 approved, I was under the regulations of the
6 Department of Labor. And so there was mandatory work
7 search. So I did both internet, face-to-face
8 contacts to try to apply for available positions
9 that I was qualified for.

10 Q. Did you ever try to find another job with
11 a CASA organization in another county?

12 A. No, I did not. Not that I recall.

13 Q. Why not?

14 A. Probably because, number one, I wasn't
15 going to -- I wasn't willing to relocate at the time
16 and just decided I would pursue other employment
17 opportunities.

18 Q. Did you not want to work at another CASA
19 organization?

20 A. That might be a fair statement. I don't
21 know.

22 Q. And you still have contacts in the Georgia
23 CASA community; right?

24 A. I do.

25 Q. And certainly, there are people in --

1 within that community who believe you were
2 wrongfully terminated; right?

3 A. I think that's reasonable.

4 Q. Sitting here today, would you want to work
5 for a CASA organization again?

6 A. I would probably entertain the -- the
7 possibility.

8 Q. Have you made any efforts to do that, to
9 work for another CASA organization in the last
10 two years?

11 A. No, I'm -- I'm very happily employed with
12 my current employer. I did shift from working with
13 and advocating for children to working with and
14 advocating for adults in the mental health system.

15 Q. To go back for a second to when you were
16 still working at Clayton County, was there a time
17 around the end of 2012 when there was less money
18 than usual available for, like, a volunteer
19 appreciation event?

20 A. No, I'm not aware of any. The FCCC always
21 did an amazing job with our volunteer events.

22 Q. So -- well, were there any volunteer
23 appreciation events that happened at the end of the
24 year that the GAL account funded?

25 A. No, those were typically held within the

1 month of April, which is when National Volunteer
2 Week falls every year. And so sometime around that
3 month, the FCCC would start having conversations
4 about what are we going to do this year for our
5 volunteer recognition event?

6 Q. Was there, like, a tradition of getting
7 polo shirts for newly sworn-in volunteers?

8 A. No, that was not a tradition.

9 Q. Did Clayton County CASA ever give polo
10 shirts to any -- anybody?

11 A. They did.

12 Q. Who received polo shirts?

13 A. The staff certainly received, so that when
14 we were doing various events or attending various
15 functions, we could wear the -- the CASA shirt. And
16 when I say that, it would have the Clayton County
17 CASA logo usually on the -- in the -- on the front
18 in the chest area.

19 I know for the Atlanta Braves event that,
20 if I'm not mistaken, the Metro Collaborative
21 provided all of the attendees a Metro Atlanta CASA
22 T-shirt that had the logo with all the counties
23 listed on the front. And maybe on the back, it had
24 -- or that was on the back. And on the front had the
25 Atlanta Braves logo with permission of the Braves.

1 When we would have, like, CASA Day at the
2 Capitol, when we were planning that event every
3 year, that occurred in February, for our volunteers
4 that would attend, we would try to ensure that they
5 had CASA shirts to wear that represented Clayton
6 County on -- on the logo.

7 Q. Was -- was there a time when you did not
8 have enough money to fund these polo shirts?

9 A. No, because if -- usually, the FCCC would
10 purchase the shirts, or if we had a grant that
11 allowed for marketing expenses, we would use that. I
12 -- I think what you may be confusing is each
13 volunteer was given a CASA pin that they could --
14 for a man, could put it on their lapel, or for a
15 female, she would wear it to the court and when they
16 went out into public.

17 Q. Was there a time when the GAL account
18 didn't have enough money to fund these CASA pins?

19 A. Again, FCCC would purchase those.

20 Q. Okay. Was there a year when the FCCC did
21 not purchase them for some reason?

22 A. Not during my tenure with the county.

23 Q. Okay.

24 You're claiming in this lawsuit that your
25 termination resulted in some emotional distress to

1 you; correct?

2 A. That is correct.

3 Q. How has this emotional distress manifested
4 itself?

5 A. Well, certainly, it was stressful. Imagine
6 losing your livelihood and your insurance when
7 you're recovering from cancer. And the number one
8 enemy for a cancer patient is stress. So there was
9 obviously the physical component.

10 There is also the financial stress of
11 having to depend on six months of unemployment to
12 not only provide funds for your mortgage payment but
13 also your car payment and your bills and other
14 financial commitments.

15 And then there was the emotional side of
16 it. And I did end up speaking with a licensed social
17 worker at Emory Hospital as a recommendation from my
18 oncologist, Dr. Godette, who had visibly noted that
19 I was depressed and was struggling.

20 Q. Did you experience any loss of sleep?

21 A. A tremendous amount of loss of sleep?

22 Q. How long did that last?

23 A. Probably up until I started with Neiman
24 Marcus six months later.

25 Q. Any, like, loss of appetite?

1 A. Absolutely.

2 Q. Did you experience any weight loss?

3 A. Probably, yes.

4 And if I can go back, additionally, when I
5 saw the licensed social worker at Emory, per the
6 recommendation of Dr. Godette, I had made some
7 comments and was referred to a psychiatrist at Emory
8 Hospital.

9 Q. And did you go to this psychiatrist?

10 A. I did.

11 Q. What's the psychiatrist's name?

12 A. I honestly don't remember. It would be in
13 my medical record, I suppose. But I went for one
14 session, and the psychiatrist did an assessment, and
15 that was the extent of my involvement with her.

16 Q. Okay. One session in --

17 A. That's correct.

18 Q. -- 2013?

19 A. Correct.

20 Q. And how long did you go to this licensed
21 social worker?

22 A. I met with him probably four to six
23 sessions.

24 Q. Okay. All in 2013?

25 A. I believe so, yes.

1 Q. And at the time of your termination, you
2 were in recovery from cancer; is that right?

3 A. That is correct.

4 Q. Was there still any treatment associated
5 with that?

6 A. I was -- I was still seeing -- I wasn't --
7 I went to see both my oncologist and my urologist,
8 but it -- it started out frequent visits, and then
9 it -- as each month passed, it -- it reduced.

10 Q. Do you still have visits related to cancer
11 recovery?

12 A. I have not. I've been told I'm
13 cancer-free.

14 Q. Okay. As of, like, what year have you been
15 cancer-free?

16 A. I think my last doctor's visit may have
17 been in 2015.

18 Q. Okay. The cancer diagnosis also is
19 stressful; right?

20 A. Of course, yes.

21 Q. So some of the emotional distress you
22 experienced during this period would be attributable
23 to being in recovery from cancer; right?

24 MR. MEW: Object to form.

25 THE WITNESS: After my termination; is

GERALD BOSTOCK
BOSTOCK V. CLAYTON COUNTY

October 14, 2021
295

1 that --

2 BY MR. HILL:

3 Q. Yeah.

4 A. -- your question?

5 Q. Yes.

6 A. I -- I feel as though the termination
7 created that additional stress. I had everything
8 under control and felt as though -- and even my
9 doctors would agree, that I was doing well in my
10 recovery and physically feeling well.

11 Q. Were you feeling any emotional distress as
12 a result of the cancer diagnosis or recovery before
13 your termination?

14 A. Not so much. More so tiredness.

15 Q. If you didn't mention already, the name of
16 the licensed social worker you were meeting with.

17 A. I honestly would have to go back into my
18 records and look. I -- I don't recall his name.

19 Q. Okay. What about the urologist?

20 A. That was Midtown Urology.

21 Q. Do you remember the doctor's name?

22 A. Yes, his name was Dr. Alphonse.

23 Q. And did you say that the last time you saw
24 him was 2015?

25 A. I'm -- I'm guessing it was around that

1 time. They had told me to expect about a three-year
2 period of recovery to be fully recovered unless
3 there were any types of complications. And that they
4 would track just to stay on top of it, but again,
5 the office visits began to decrease as each month
6 went by.

7 Q. Were there any other medical conditions
8 that contributed to your emotional distress
9 following your termination?

10 A. No, I don't believe so.

11 Q. Okay.

12 After your termination, did you have any
13 discussions with friends or family, or other loved
14 ones about the emotional distress you were
15 experiencing?

16 A. Mostly my mother.

17 Q. Is your mother still with us?

18 A. She is.

19 Q. Where does she live?

20 A. She resides in Cleveland, Georgia.

21 Q. What kind of discussions did you have with
22 your mother about your emotional distress?

23 A. Well, she had been with me from the
24 beginning of my diagnosis and was actually in the
25 room with me when I got the actual diagnosis. So it

1 was her continued love and support of checking on
2 me. How are you feeling today? Is this week a better
3 week than last week? Those kinds of conversations.

4 Q. And were -- so were those conversations
5 mostly about your medical condition?

6 A. We spoke about a lot of things, but I did
7 -- in answer to your question, I did speak to her
8 about my stress level and --

9 Q. Did you talk with her specifically about
10 your termination?

11 A. Of course, I did. She's my parent.

12 Q. Do you remember what you -- what you
13 talked about with her regarding your termination?

14 A. I spoke with her that evening and told her
15 that I had been terminated. The stated reason was
16 conduct unbecoming of Clayton County employee, but
17 that it was based on discrimination because of my
18 sexual orientation. And she was quite upset.

19 Q. Did you ever have to undergo, like,
20 surgery after your termination?

21 A. I have had surgery after termination. I
22 think it was in 2019.

23 Q. Was this a stressful event?

24 A. The surgery?

25 Q. Yes. Yes.

1 A. It was a necessary surgery. It was an
2 emergency surgery, and I recovered very quickly from
3 it. So I don't recall any undue stress because of
4 it.

5 Q. Did it have anything to do with the
6 prostate cancer?

7 A. No, it was gallbladder-related.

8 Q. Okay. Did you ever have to go through
9 chemotherapy?

10 A. No, I went through five weeks of external
11 radiation --

12 Q. Okay.

13 A. -- daily.

14 Q. And was that all before your termination?

15 A. Yes, that was in 2012.

16 Q. Okay. Do you currently own or rent your
17 home?

18 A. I own.

19 Q. And how long have you been at your current
20 address?

21 A. Since November of 2014.

22 Q. Okay. Do you have a mortgage?

23 A. Yes.

24 Q. What's, like, the monthly mortgage
25 payment?

GERALD BOSTOCK
BOSTOCK V. CLAYTON COUNTY

October 14, 2021
299

1 A. I want to say -- I believe it's either
2 1,100 or 1,200.

3 Q. And do you pay all of that yourself, or
4 does anyone contribute to it?

5 A. No, I have a partner now.

6 Q. So do you split the payment for the
7 mortgage?

8 A. Pretty much our --

9 Q. Do --

10 A. I'm sorry.

11 Q. With your partner, do you split the
12 payment for the mortgage?

13 A. We have our own accounts, but we -- we
14 basically combine funds to cover any and all of our
15 expenses.

16 Q. Okay. Do you know the balance of the
17 remaining loan on the house -- or the home?

18 A. We recently did a refi (sic) to do some
19 upgrades, and I believe it's right at or around
20 200,000.

21 Q. And you currently have health insurance;
22 right?

23 A. I do.

24 Q. And you have health insurance through your
25 work -- employment right now?

1 A. That is correct.

2 Q. Okay.

3 Do you have a car payment?

4 A. My vehicle is paid off.

5 Q. Okay. Apart from the mortgage, any other
6 regular monthly payment that you make?

7 A. I have a credit card that I pay off
8 monthly.

9 Q. Okay. Anything else?

10 A. No.

11 Q. The automobile, when did that become paid
12 off?

13 A. Probably in or around 20 -- end of 2017,
14 maybe 2018.

15 Q. Okay.

16 A. I -- I believe 2018.

17 Q. Would you say you experienced any sort of,
18 like, emotional distress from lack of -- lack of
19 money for a period after your termination?

20 A. Absolutely, yes.

21 Q. How long did that last?

22 A. Well, I was able to breathe a sigh of
23 relief when I landed the job at Neiman Marcus, even
24 though it was considerably less than I was making
25 with Clayton County.

GERALD BOSTOCK
BOSTOCK V. CLAYTON COUNTY

October 14, 2021
301

1 Q. And you got that position about six months
2 after your termination; is that right?

3 A. That's correct.

4 Q. At the -- your job at Georgia Regional, at
5 some point, you voluntarily requested a demotion to
6 a lower-paying position; is that right?

7 A. That is correct.

8 Q. Well, why did you do that?

9 A. I had been doing the job of the treatment
10 team facilitator, which I enjoyed immensely. The
11 psychiatrist team that I was assigned to was a
12 fantastic doctor. However, a position became
13 available in the psychology department as a mental
14 health counselor.

15 And I felt as though it would be a good
16 opportunity for me to continue to learn, number one,
17 but to also work more directly with the patients
18 that were on my unit that I'm assigned to.

19 And when I went through the process, I
20 didn't even realize initially that it was a lower
21 paygrade. But during the application process for
22 that, the chief of psychology had informed me that
23 if I were offered the job, that he could do what he
24 could to see if the State would be willing to
25 increase the salary.

GERALD BOSTOCK
BOSTOCK V. CLAYTON COUNTY

October 14, 2021
303

1 Mr. Bostock, right before the break, w
2 were talking about financial stress resulting from
3 your termination. Did you have a bank account at the
4 time of your termination?

5 A. Yes.

6 Q. Did you have a -- did you have more than
7 one account?

8 A. No, I believe it was just my checking
9 account.

10 Q. Checking account.

11 Do you recall what the balance was at the
12 time of your termination?

13 A. No, I don't.

14 Q. Did it ever get overdrawn after your
15 termination?

16 A. No, it did not.

17 Q. You didn't have a savings account at all?

18 A. At one point, I did, and I merged the two
19 accounts. I don't exactly recall the reason. I don't
20 think my return on the savings account was what I
21 wanted, so --

22 Q. But that was before your termination?

23 A. Yes.

24 Q. The merger? Okay.

25 What bank was that with?

1 A. I bank with USAA.

2 Q. The same account today?

3 A. Yes.

4 Q. Okay. Did you -- you had a pension with
5 the county? Did you --

6 A. Yes.

7 Q. Were you vested at the time of your
8 termination?

9 A. Yes.

10 Q. Okay. Did you have to tap into your
11 pension as a result of the termination?

12 A. I was forwarded paperwork from the county
13 asking me to make a decision as to whether I wanted
14 to, basically, cash out or to fill out paperwork to
15 continue. But at that time, the EEOC investigation
16 had begun, and I was instructed by the federal
17 investigator not to speak with anyone in the
18 administration of Clayton County.

19 Q. Okay.

20 A. So I did not respond to the paperwork that
21 had been forwarded to me.

22 Q. Okay. And so you did not cash it out.

23 A. I have not cashed --

24 Q. Right?

25 A. -- it out.

1 Q. Okay. So it's still there today?

2 A. That is correct.

3 Q. Okay. With your current employer, do you
4 have any sort of retirement savings?

5 A. There is a retirement plan, yes.

6 Q. Is it like a 401(k)?

7 A. It is. So I make a certain contribution,
8 and then the employer makes their contribution.

9 Q. Do you know how much your contribution is?

10 A. I don't right off. I don't -- I don't know
11 the percentage that they take.

12 Q. Do you know, like, the dollar amount per
13 month that you put in there?

14 A. I know it's less than what the State puts
15 in.

16 Q. Less than what the State put in when --
17 wait. Are you saying it's less -- you contribute
18 less than your employer contributes?

19 A. Yes.

20 Q. Got it. Okay.

21 And -- but you don't know how much that
22 is?

23 A. Not right off, I don't recall.

24 Q. Do you know what the balance is?

25 A. No, I don't.

1 Q. Do you have any other source of savings
2 besides county pension and this 401(k)?

3 A. I do from another former employer, the
4 Northeast Georgia Regional Development Center.

5 Q. Do you know what the balance of that is?

6 A. It's probably maybe 17,000.

7 Q. Is that a 401(k)?

8 A. Yes. Yeah.

9 Q. Okay.

10 A. I think so.

11 Q. At any point after your termination, were
12 you in a position where you had to, like, max out
13 your credit cards?

14 A. No.

15 Q. Okay. And how many credit cards do you
16 have?

17 A. I carry my main Mastercard -- or Visa
18 through USAA, and that's the only card I use.

19 Q. Okay. Is that -- and that was the case
20 back in 2013, also?

21 A. Pretty much. It -- as best I can recall,
22 I've -- I've got other credit cards, but I don't use
23 them.

24 Q. So after your termination, did you have to
25 tap into any other source of funds other than your

GERALD BOSTOCK
BOSTOCK V. CLAYTON COUNTY

October 14, 2021
307

1 checking account?

2 A. A big chunk of my checking account did
3 have to be used to make sure I maintained my home
4 and car note and -- and the bills, but I also had
5 some financial help from my mother.

6 Q. Okay. Do you know about how much financial
7 help you got from your mother?

8 A. Maybe all total during that window of
9 time, between the termination and Neiman Marcus,
10 maybe about 800 to 1,000 if that.

11 Q. Okay. Do you know -- when you said a
12 pretty big chunk of your checking account had to get
13 depleted during that time, how much?

14 A. About 16,000.

15 Q. Okay. And that's -- you're talking about
16 during the time from your termination until you
17 started getting a paycheck from Neiman Marcus?

18 A. And a little beyond because I had to pay
19 for COBRA Insurance, which was \$500. And my
20 insurance with Neiman Marcus did not kick in, I
21 don't believe, until January of 2014.

22 Q. Okay.

23 Do you know how much you pay in health
24 insurance premiums now?

25 A. Not right off. I have a Kaiser Permanent

1 plan. And as best I can recall, that's one of the
2 more affordable plans that the state of Georgia
3 offers.

4 Q. Does your employer contribute to your
5 health insurance premiums?

6 A. I imagine so, but I do make a -- you know,
7 premium per pay period.

8 Q. Okay. Do you know how much the -- your
9 employer contributes?

10 A. I don't.

11 MR. HILL: We don't have any further
12 questions?

13 MR. MEW: Okay. I'm -- I'm going to be
14 super brief follow-up.

15 MR. HILL: Sure.

16 DIRECT EXAMINATION

17 BY MR. MEW:

18 Q. Mr. Bostock, you testified a little bit
19 earlier today about an interview that Mr. Teske gave
20 to Richard Belcher at or around the time of your
21 termination. Do you recall that testimony?

22 A. I do recall that.

23 Q. Did it cause you distress to hear
24 Mr. Teske broadcast on the news media that you had
25 misappropriated funds?

GERALD BOSTOCK
BOSTOCK V. CLAYTON COUNTY

October 14, 2021
309

1 A. Yes, it did cause me a lot of distress. My
2 -- my name, my reputation in that community that I
3 had worked so hard to create the program, that the
4 county juvenile court continually bragged about. It
5 was embarrassing and very stressful.

6 MR. MEW: Okay. That's -- that's all I
7 have. Thank you, Mr. Bostock.

8 RE-CROSS EXAMINATION

9 BY MR. HILL:

10 Q. Real quick on the subject of interviews.
11 You have given interviews to the media about this
12 lawsuit; correct?

13 A. I've given interviews about my termination
14 due to my sexual orientation.

15 Q. Okay. About how many media interviews do
16 you think you've given?

17 MR. MEW: What does this have to do with
18 the scope of my redirect to him?

19 MR. HILL: You were talking about
20 interviews --

21 MR. MEW: No.

22 MR. HILL: -- that Judge Teske gave. So
23 I'm talking about --

24 MR. MEW: No, I'm speaking specifically
25 about one on the emotional distress issue that

1 you raised. Not the open-ended issue of how
2 many interviews Judge Teske did or didn't give.

3 MR. HILL: You think that's beyond the
4 scope?

5 MR. MEW: I do, yeah.

6 MR. HILL: Okay. We're done with the
7 questions.

8 MR. BUCKLEY: Thank you.

9 THE VIDEOGRAPHER: This --

10 MR. BUECHNER: Where are we with --

11 MR. MEW: Yeah, thanks.

12 THE VIDEOGRAPHER: This concludes the
13 deposition. The time is 6:51, and we're going
14 off the video record.

15 (Deposition concluded at 6:51 p.m.)

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GERALD BOSTOCK
BOSTOCK V. CLAYTON COUNTY

October 14, 2021
311

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D I S C L O S U R E

Pursuant to Article 10.B of the Rules and Regulations of the Board of Court Reporting of the Judicial Council of Georgia, I make the following disclosure:

I am a Georgia Certified Court Reporter. I am here as a representative of Esquire Deposition Solutions. I am not disqualified for a relationship of interest under the provisions of O.C.G.A. 9-11-28(c).

I was contacted by the offices of Esquire Deposition Solutions to provide court reporting services for these proceedings. I will not be taking this deposition under any contract that is prohibited by O.C.G.A. 15-14-34 (a) or (b).

I have no exclusive contract to provide reporting services with any party to the case, any counsel in the case, or any reporter or reporting agency from whom a referral might have been made to cover this deposition.

I will charge my usual and customary rates to all parties in the case, and a financial discount will not be given to any party to this litigation.

DATED: October 26, 2021



Stephen Mahoney
Certified Court Reporter
4921-4880-0199-0656

GERALD BOSTOCK
BOSTOCK V. CLAYTON COUNTY

October 14, 2021
312

CERTIFICATE

STATE OF GEORGIA

COUNTY OF COBB

I hereby certify that the foregoing deposition was reported as stated in the caption and the questions and answers thereto were reduced to writing by me; that the foregoing pages represent a true, correct, and complete transcript of the evidence given on October 14, 2021 by the witness, Gerald Bostock, who was first duly sworn by me.

I further certify that I am not of kin or counsel to the parties in the case; I am not in the regular employ of counsel for any of said parties; nor am I in anywise interested in the result of said case. The witness did reserve the right to read and sign the transcript.

DATED: October 26, 2021



Stephen Mahoney
Certified Court Reporter
4921-4880-0199-0656

GERALD BOSTOCK
BOSTOCK V. CLAYTON COUNTY

October 14, 2021
313

1
2
3
4
5
6
7
8
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14
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E R R A T A S H E E T

I have read the foregoing transcript of my testimony given on October 14, 2021, and wish to make the following changes.

Page No. ____ Line No. ____

Reason: _____

I wish to make no changes. _____

Signed: Gerald Bostock, Deponent

Sworn and subscribed before me

This ____ day of _____

NOTARY PUBLIC

GERALD BOSTOCK
BOSTOCK V. CLAYTON COUNTY

October 14, 2021
Index: \$1,200..2

	\$17,000		5:6	14458
<u>Exhibits</u>	196:5	<u>0</u>	11:10	187:23
	\$2,300		59:9	14th
7523362 Ger	195:4	014035	11:23	4:3
ald.		148:3	59:12	196:15
Bostock.	\$2,500	05/28/2012	11th	197:2
EXHIBIT1	213:18	203:14	51:5	15
92:14,18	\$250		110:19	254:11,17
7523362 Ger	274:21	<u>1</u>	244:19	16
ald.	275:4,8		12	265:3,7
Bostock.	\$3,300	1	24:7	16,000
EXHIBIT2	195:3	92:14,18	182:16	307:14
104:1,7	\$312	104:19	238:1,15,	17
7523362 Ger	162:1	245:22	18	272:2,6
ald.	\$321.40	248:18	12-year	17,000
Bostock.	163:23	254:24	24:10	306:6
EXHIBIT3	\$33,000	1,000	12/07/2011	18
109:10,16	196:7	307:10	147:20	275:12,14
7523362 Ger	\$330	1,100	148:10	19
ald.	155:22	299:2	12:20	278:4,6,
Bostock.	\$45.51	1,200	103:18	8,10
EXHIBIT4	115:9,20	299:2	12:21	279:6
	167:3	10	103:21	1982
7523362 Ger	\$500	198:18	12:36	46:6
ald.	88:5,11,	201:13	114:23	1988
Bostock.	24 98:24	203:6,10	12th	49:6
EXHIBIT5	99:20	205:4,13	51:5	1989
146:15,19	107:9,10	207:12	13	49:6
7523362 Ger	118:22	10:06	244:13,	1999
ald.	119:16,21	4:3	17,22	45:13
Bostock.	120:10	11	14	1:23
EXHIBIT6	125:5	217:3,5,	251:25	115:1
	126:3,8	10 229:23	252:6	
	127:1	11/07/2012	14034	
	132:22	187:25	147:18,24	2
<u>\$</u>	133:3,12	110	164:24	
	166:17,21	113:3	14035	2
\$1,200	307:19	112	147:24	104:1,7,
195:2		113:10	14158	19 106:25
\$15.10	-	116CV1460	187:22	119:12,
156:1	--like			13,14
\$16,000	73:13			
196:4				

GERALD BOSTOCK
BOSTOCK V. CLAYTON COUNTYOctober 14, 2021
Index: 2,000..6:33

195:10	2010	2014	31	233:13
204:11	238:23	39:16	230:6	4:43
253:10,12	239:9	65:24	35	233:16
255:8,9	244:19	298:21	148:6,8	
2,000	245:4	307:21	377	5
212:14	255:10,11	2015	104:4	
20	2011	66:22	3818	5
196:23	17:15	109:14	39:14	146:15,19
278:16,21	146:16,	110:19	3:06	248:13
279:7	22,25	294:17	192:24	50
300:13	195:2	295:24	3:28	43:23
200,000	196:3,11	2017	193:3	71:17
299:20	197:10	67:5,9	3rd	253:11,18
2000	258:25	300:13	35:7	262:7,12
50:20	2012	2018	69:16	501(c) (3)
51:21	17:13	300:14,16	165:5	91:12,25
2001	28:10,12	2019		100:11
52:2	71:12,13	67:14	4	101:12
2003	167:20	297:22		540
9:25 10:1	173:2	2021	4	254:12
11:9 20:2	195:3	4:3 114:6	115:9,20	5:44
24:9 65:9	196:4	21	246:21	277:22
68:13,19	197:2,10	113:4	247:4	5:59
69:14	225:6	239	248:12	277:25
91:4,6,20	250:7	115:12	401(k)	5k
101:11,20	254:13	24	305:6	123:10
106:23	289:17	247:9	306:2,7	144:18
107:23	298:15	253	44	145:13
176:1	2013	245:3	111:15	188:17,
2004	20:2 28:6	247:25	45	20,22,24
48:9	46:19	3	112:12	6
2005	69:16		46	
48:10	177:14,	3	262:12	
2006	15,20,25	3	48	106:24
24:11	193:10	92:25	112:19	167:13,15
2007	195:4	109:10,16	253:10,18	248:13,14
117:10,16	196:6,11	112:12	262:6	600
124:8,25	197:8,22	122:2,13	497	4:6
2009	206:4	265:22	252:3	6:33
28:12	250:5	3,000	4:27	302:17
255:10	264:14	195:10		
256:5	266:6			
	293:18,24			
	306:20			

GERALD BOSTOCK
BOSTOCK V. CLAYTON COUNTYOctober 14, 2021
Index: 6:42..actions

6:42		100:23	131:6,7,	100:19
302:22	A	abuse	14,16	accounts
6:51		72:22	132:5,6,	43:16
310:13,15	a.m.	82:15	25 133:3,	98:17,19
	4:3	84:5	8,17,20,	127:17
		85:12,23	25	129:22
7	ABC	86:12	134:13,	130:1,4,7
	36:25	139:7	17,20,23	132:1,2
7	127:12	144:10	135:16,19	299:13
193:8,15	149:13,	223:20	136:3,12,	303:19
	14,15,17,		13,20,21	
70	18,21,22	access	137:2,15,	accuracy
176:12	150:7,8	25:2,3	21 138:7,	167:21
	165:4,11,	39:22	25	193:13
75	22 166:2,	132:13	139:21,22	accurate
252:21	18 209:7,	141:1	140:6,17,	7:9 149:5
	17,18	142:8	21	248:3
8		accompany	142:10,13	
	ABCS	287:19	146:17	accurately
8	18:5		149:6	272:11,19
195:14,23	96:18	accordance	150:9,11,	acronym
	97:9 98:6	5:7	24 151:1	180:14
800	124:22	account	165:11,	act
307:10	151:18	43:9,11	21,22	66:11
88	153:8	67:15	166:2	225:4
49:6	166:16	77:11	167:6,19	232:3
	ABCS'	90:24	171:15,21	245:24
	98:6	98:7,12,	178:9	
9		21,23	186:3,5,7	acting
	ability	99:4,8,	187:12	61:25
9	7:14	13,19,25	188:19	280:8,10
112:20	151:16	100:16	192:10	
113:11	152:2	101:23	193:10	action
197:13,16	214:18	108:15	195:1,11,	42:13
203:8	252:11,20	109:1	17,19,20,	63:1
205:4	absence	110:15	22 196:3,	67:20
	75:8	111:5	10 240:8	110:9
96		113:5,14,	275:7	225:24
49:13	absolutely	18,23	289:24	263:6
	174:3	114:10,14	291:17	
99	213:10	118:22	303:3,7,	actions
50:5	225:23	127:12,	9,10,17,	24:20,23
140:14	237:24	13,16,22	20 304:2	25:5
9th	247:2	128:8,24,	307:1,2,	33:18
245:4	293:1	25 129:8,	12	91:10
	300:20	21 130:5	accountant	214:2
	absorbed			250:18
				255:23

GERALD BOSTOCK
BOSTOCK V. CLAYTON COUNTYOctober 14, 2021
Index: activities..allocated

activities	additional	adults	after-game	98:17
21:17	15:24	50:1	236:21	airport
64:9	54:17	289:14	after-hour	170:23
94:14	66:21	advertiseme	244:6	alcohol
125:12	67:8	nt	after-hours	89:4,9
154:24	81:18	185:8	244:2,3	90:13,25
157:25	83:17	advertises	after-	135:5
249:2	162:11,15	176:15	practice	172:4,10
activity	167:18	177:2	236:21	alcoholic
21:15	194:19	advertising	afternoon	89:15
60:24	201:23	93:21	35:4	Alexander
161:6	295:7	106:13	agencies	274:9
224:6	302:3	advice	40:18	276:6
234:5	additionall	103:1,4	agent	278:5
242:7	y	137:17	107:19	Alexander's
acts	293:4	advisory	agitated	275:17
40:20,25	address	91:6,11,	35:17	aligned
actual	39:11,12,	14,17,20	agree	136:15
20:23	20 40:2	92:10	5:15 6:17	all-
58:4	58:20	100:10,24	119:1	inclusive
178:19	124:6	214:8	139:12	175:20
185:7	241:2	advocate	169:18	allegation
204:18	298:20	105:11	218:13,18	259:11
210:20	addressed	169:21	225:16	allegations
212:11	241:10	advocates	254:2	7:18
240:9	administrat	75:1	261:1	279:10,
296:25	ion	122:24	276:21	12,17
ad	64:8	126:14	280:7,14,	280:13,
50:23,25	69:23	168:21	22 295:9	19,23
51:15	75:9,22	206:7,16,	agreed	alleged
88:21	140:2	25	141:19	68:12
125:16	198:19	advocating	166:14	allegedly
195:22	201:20	289:13,14	191:8	256:21
add	219:13	affected	210:22	266:21
302:3	232:8	85:2	213:12	alleging
added	304:18	affirm	agreement	226:12
134:11,16	administrat	4:21	5:7 47:12	allocate
adding	ive	affordable	117:22	250:3
128:25	119:13,	308:2	259:16	allocated
addition	16,18	African	276:18	143:24
182:22	admissions	86:15	ahead	
211:20	49:21	Adult	89:5	
235:19	Adult	59:24		

GERALD BOSTOCK
BOSTOCK V. CLAYTON COUNTYOctober 14, 2021
Index: allocation..arranged

144:12	292:21	anymore	214:2	approve
allocation	305:12	101:11	249:9	112:2
143:19,21	and/or	Aon	apply	138:7
162:13	110:5	174:4,24	78:8	201:21
251:15	Andrea	apartment	288:8	approved
allowed	169:5,20	150:5	applying	251:18
5:8 25:2	Angela	apologize	51:17	274:13,15
160:2	66:13,23	31:20	186:10	288:5
291:11	67:16	161:2	appoint	approver
Alphonse	Angeles	apparently	88:20	139:14
295:22	80:2	36:10	appreciated	approving
Amanda	animus	67:10	63:14	134:24
44:9	32:16	166:8,10	appreciatin	275:21
amazing	62:6	257:5	g	approximate
289:21	Annell	274:23	181:21	ly
ambassador	90:5	appearing	appreciatio	195:4
151:9,13	161:13,14	15:22	n	196:7
ambassadors	171:4	appears	96:10	April
18:6	Annie	115:19	149:14,	46:20
96:20,21	89:25	122:10	18,21	193:12
97:3	annual	194:12,15	150:2,11	199:16
98:21	55:4	195:6	152:9,17	220:7
124:22	81:25	203:9	153:1,6	223:10
150:12,	166:4	248:9	154:19	234:23
18,23	181:10,19	254:11	162:21	264:14
151:1	182:20	272:14	181:5,19	267:3
182:21	196:16	275:19	289:19,23	290:1
American	197:2	278:11	apprehended	architectur
86:15	annually	appetite	47:3,5	e
AMLI	94:4	292:25	48:6	174:20
150:3,4,5	answering	appetizers	approach	area
152:9,10,	7:1 117:5	236:20	243:11,15	36:23
11,13,17,	answers	application	approached	44:4,20
21	6:9 7:9	178:6	10:24	189:2
amount	112:24	207:2,10	approval	210:1
78:3	113:15	208:4	112:18	239:15,23
119:2,8	anti-gay	301:21	132:18	261:23
126:8	61:17	application	133:4	290:18
127:8	62:6	s	137:1,21	areas
142:1	Antique	76:23	274:8,11	96:6
167:3,7	175:22	applied	approvals	arranged
195:10		52:6,7	132:24	162:5

GERALD BOSTOCK
BOSTOCK V. CLAYTON COUNTYOctober 14, 2021
Index: arrested..aware

arrested 46:3	assistant 163:8 204:1	50:8 163:12	23:20 29:5,8 45:4	audit 66:2,21, 25 67:9, 14,15,19
Article 92:25 104:19	assisting 157:24 242:1	Atlanta 4:7 28:15,20 39:14 43:23	88:13 135:6 140:12,16 158:7,9,	198:12 219:9 223:3
articles 92:15 101:15,20 102:10 104:21	associate 177:9	44:4,20 52:1,3 71:16 145:2	13 160:9, 13 161:9, 14 172:18 183:9,11	264:13 282:7,8, 12 283:6
asks 205:11	associating 247:11,22	150:6 161:6 163:18,19	212:6 240:16 241:16 242:15	auditor 282:24 283:11
aspect 219:16 237:15	association 181:7,8	172:3 182:17 188:20,24	attendees 290:21	auditors 131:18
assess 124:9	assume 6:21 29:21	189:2,6 205:24 206:3	attending 183:17 290:14	audits 65:24 283:8
assessed 125:6 273:6,13, 16	77:25 88:18 117:18 216:13	213:17 261:23 290:19, 21,25	attention 92:24 109:19	August 177:24 235:1
assessment 293:14	assumed 200:1 230:25	attached 245:2 247:25	attitude 219:12, 14,22 222:7 281:14	authority 108:5 111:9 112:5 138:1,6 245:18
assessments 49:24 118:22	assuming 100:18 104:14 145:15	attempt 97:6	attorney 104:16 109:14 127:2 269:6	authorizing 114:12
assigned 51:3 82:19,21 84:15 119:22 246:17 253:24 301:11,18	183:10 195:21 243:13 285:17	attend 20:13,16 83:21 160:11 161:12 162:12,16 170:14 291:4	attorney's 125:21	automation 67:21
assist 76:20 93:5 105:4,23 110:4	assumption 284:23	attendance 20:12	attorneys 8:3 125:16	average 262:15
assistance 203:25	assumptions 285:25 286:17,21	attended 6:2 20:21,22, 23 21:3	attributable e 294:22	avoidance 222:11
	AT&T 205:21		audible 115:14	aware 8:5 9:18, 21 10:4, 21 14:23 15:10
	Athens			

GERALD BOSTOCK
BOSTOCK V. CLAYTON COUNTYOctober 14, 2021
Index: awareness..Becky

16:19, 23	36:14	112:5	bar	274:25
58:2	49:16	Badgers	23:7, 9,	284:12
65:25	52:1, 2, 10	229:2, 8,	16, 17	297:17
72:20	59:13	14	89:14	basic
99:17	71:1	230:14, 16	90:3	245:14
100:4	103:22	234:12	112:21	basically
110:2	108:13	274:24	135:7	83:6
111:23	110:7	balance	172:4	201:22
112:2, 16	115:2	140:21	193:25	221:15
120:8	137:5	299:16	236:13	239:10
131:18, 20	150:20	303:11	barely	242:12, 23
134:21	160:18	305:24	159:16	250:1
135:12	166:10,	306:5	Barr	299:14
136:7	11, 20	ball	49:1	304:14
221:21	176:1	176:6, 7	bars	basing
222:3, 21	178:21	229:5	219:1	68:18, 21
223:7	180:24	bands	base	basis
227:4	193:2	239:22	284:1	54:23
238:24	194:19, 22	bank	baseball	145:8
247:6	201:3	67:15	272:16	286:21
260:25	202:4	114:10	based	Bates
281:20	205:3	134:15	16:8	115:11
289:20	210:23	139:25	37:20	146:22
awareness	226:7	140:7, 17	69:22	147:17
93:3, 14	229:12	146:16	80:12	153:19
94:3 95:8	233:16	149:5	85:15	245:2
98:1	238:22	167:19, 21	86:18	Bates-
105:2, 22	246:23	193:9, 13	90:22	stamped
106:13	247:1, 3, 7	195:19	116:25	104:3
162:6	262:6	303:3, 25	117:6	106:25
164:19	268:6	304:1	126:7	109:20
170:8, 9	274:22	Banke	136:5	156:9
174:17	278:1	91:16	179:15	254:12
185:9, 15	289:15	bankruptcy	214:2, 3	bathroom
188:23	290:23, 24	47:25	217:22	233:7
213:19	293:4	banner	218:6	Bear
242:4	295:17	211:21,	224:16	Bear
	302:23	23, 25	225:4, 25	268:4
	306:20	212:1, 3,	232:9, 12	beating
B	background	7, 10, 13,	250:18	225:9, 12
	8:14	18 233:24	263:15	Becky
back	backup	banquet	264:9, 24	76:12
7:21 12:8	163:1	154:19	266:15	257:19
15:3	169:4	bad	267:16	
27:16				
28:19				

GERALD BOSTOCK
BOSTOCK V. CLAYTON COUNTYOctober 14, 2021
Index: beer..Bostock

282:3	18 264:1,	241:18	283:11	138:5,21
beer	3 265:1	Beya	Blake's	140:4,6,
220:15,	266:13	39:14	193:25	12,17,22,
16,19	267:7	big	blue	25 141:9
began	269:10	307:2,12	228:6	152:12
9:24	believed	biggest	board	153:5
61:12	42:7	94:3	17:2,4	165:9
71:3	78:22	bills	91:6,11,	166:18
124:13	136:12	292:13	13,21	168:8,12,
249:11	199:4	307:4	92:10	13,20,22,
264:20	208:19	Birmingham	95:4	24 169:1,
296:5	209:4	207:9	98:12	2,15,19
begin	243:21	238:5,10	99:8,13	184:2
31:18	264:18	birth	100:10,24	185:10,18
207:9	284:17	39:7	101:16	186:1,6,
beginning	believing	birthday	102:14	16 187:3,
60:3	265:17	282:3,4,5	103:5	13 195:19
174:19	Belkus	472:3,4,5	104:25	196:3,10
223:9	75:15	biscuit	106:3	214:8
296:24	belongings	141:5,12	108:8,18,	240:8
begins	260:16	142:9	19 109:1,	241:15,21
149:19	beneath	143:1	7 110:2,	242:2
begun	74:6 76:6	biscuits	8,9,15,22	244:7
304:16	122:2	141:16,	112:4,7	274:1,4,
behalf	beneficiary	18,21	113:13,	7,9,10
4:13,15	130:22	bit	19,21,22	board's
144:9	Benefield	72:5	114:7,12	274:14
behaviors	128:19	118:20	127:12,	Bodeen
24:20,23	214:10,13	188:7	21,24	207:7
250:18	215:1	308:18	128:14,	books
251:3,6	benefit	black	16,25	140:10,23
Belcher	120:22	30:4,15	129:3,8,	booth
36:25	220:13	87:22	25 130:5	240:3
209:20	237:9	246:24	131:7,11,	241:13
308:20	benefits	247:22	16 132:6,	Bostock
belief	221:10	249:7	14,16,18,	4:5,14,16
129:1	276:13	250:14	24 133:2,	5:2,3,11,
130:10	Bennett	251:9	3,4,24	23 12:12
175:4	174:12,25	255:11	134:2,9,	31:16
232:12	beverages	279:16	11,15,22	32:18
261:12	89:15	280:7	135:11,	38:20
263:9,14,	135:7	281:11,18	15,24	44:7,8,18
		282:2	136:2,13,	59:15
			21 137:1,	103:25
			2,17,21	

GERALD BOSTOCK
BOSTOCK V. CLAYTON COUNTYOctober 14, 2021
Index: bottom..calmly

115:4	break	128:4	bullet	128:13
147:23	59:8, 11,	241:17	240:24	
149:4	15 103:20	243:5	243:10, 25	
193:5	114:20, 25	251:7		C
209:13	138:10, 13	Bubbles	bunch	
224:19	188:4	188:14	6:2	Cactus
233:20	192:23	Buckley	burglary	159:4
248:8	193:1	4:15	48:5	Cadillac
252:12, 23	233:7, 8,	285:4, 7,	Burton	65:14
278:3	15	9, 17, 19	205:21	Cake
303:1	277:17, 24	286:2, 14	busiest	155:22
308:18	302:21	302:16	150:16	Cakin
309:7	303:1	310:8	business	155:12,
bottom	breathe	budget	25:23	13, 14
159:1	300:22	78:1, 18	154:3	call
163:1	briefly	100:20, 24	169:7	36:8
183:6	199:1	Buechner	175:10	50:25
194:4	bring	4:11	176:18	57:6, 15
252:10	191:11	216:19,	183:12, 20	58:5, 19
273:25	201:23	22, 25	business-	60:17
275:18	237:19	217:7	oriented	61:5 99:3
279:11	bringing	278:8	222:11	123:20
bought	65:12, 19	279:8	businesses	170:22
39:23	284:7	284:2	183:18	211:23
box	brings	310:10	239:17	216:25
252:10, 20	255:8, 9	buggies	240:15	286:10
255:8	broad	166:7	Butler	called
boxcar	214:17	Buggs	160:12	36:17
182:21, 24	215:13,	67:16	buy	38:24
183:1, 4	15, 22	building	199:24	49:17
boyfriend	216:1	143:2	200:17, 18	52:18
20:17	broadcast	151:24	201:12	58:3, 8
boyfriends	230:23	164:15	buying	59:25
284:25	308:24	173:15, 20	162:20	74:10
bragged	Broadcastin	174:22	199:22	96:4
309:4	g	182:5	200:12	145:2
Brasstown	172:15	187:4	bylaws	239:14
160:5	173:9	199:9	104:2, 11	242:17
Braves	brought	245:9	105:17	calling
161:19	13:15	248:25	132:21	57:20
162:6, 20	112:13	275:10	133:1	99:8
290:19, 25	126:18	buildings	bypass	118:21
	127:9	239:18		calmly
				242:18

GERALD BOSTOCK
BOSTOCK V. CLAYTON COUNTYOctober 14, 2021
Index: camera..CASA

camera	134:16,20	carried	12 110:6	168:15,17
169:25	135:4	69:20	112:7,22,	170:9
170:2,3,	136:2,25	carries	25 113:2	171:6
4,5	166:8,15	7:2	116:5,6	173:7,23
campus	171:22	carry	117:23	174:17
59:23	181:23	306:17	118:13,16	179:23
cancer	188:13,	carrying	119:17,22	180:1,5,
18,21	18,21	9:14	120:18,22	16 181:11
224:13,	300:7	carwash	122:3,7,	182:2,22
18,20,22	306:18	159:18	14	183:1,14,
225:5,9,	cards	CASA	123:15,	17,22
12,17,18,	131:5,19	17:3 18:6	16,21,24	185:6,8
22 226:5	181:4,9	50:24,25	124:19,	188:20,23
292:7,8	182:3	51:8	22,23,25	189:1,4,
294:2,10,	189:9	53:2,7	126:18	5,6,16,24
18,23	306:13,	64:3,17	127:9	190:4,6,
295:12	15,22	66:12	130:16,	16,17,20
298:6	care	72:13,16,	17,21	191:10,
cancer-free	25:22	22 73:5,	131:2	15,16
294:13,15	49:10	17 74:1,	143:7,9,	192:7,11
Cantina	72:1	10 75:5,	14,15,18,	199:8
283:16	84:7,9	24 76:8,	21,25	202:20
capacities	96:25	9,19,24,	144:4,7,	204:12,
277:10	152:15	25 79:14	9,10,14,	15,18,21,
capacity	career	80:3,24	17,21,23	23 205:9,
91:22	17:12	81:1,7,	145:2,7,	12,15
154:9	264:23	15,21,24	10,11,17,	206:8,9,
Capitol	careful	82:1,18	23,24	18,21
291:2	26:23	83:3,5,7,	146:2,3,7	207:8
capturing	caregivers	18,21,23	150:13,	208:5
148:13	151:5	84:10,14,	18,24	210:23
car	155:19	17,20	151:1,9,	212:20,
159:4,10,	Carol	88:21	11,18	22,23
25 240:13	29:22	91:3,8	152:19,	213:9,13
292:13	30:17	92:5,7,15	20,23,24	215:4
300:3	82:25	93:1,2,8,	154:7	220:13
307:4	199:1	17 94:7,	156:13	223:24
card	201:18,25	24 95:8	157:7,10,	232:6
39:4	202:12,22	96:21,22	15 158:7,	237:16
131:10,	266:11	97:5,12,	9,13,19	240:2
11,16	267:8,14	14 98:21	159:8	242:4
132:1,5	Carrabba's	104:3	160:4,7,	244:11
133:14,25	156:10	105:1,9,	10	245:3
		18 106:8,	161:11,19	247:24
			162:5,6,	256:24
			18,21	257:15
			164:19	273:18

GERALD BOSTOCK
BOSTOCK V. CLAYTON COUNTY

October 14, 2021
Index: CASA-MANDATED..child

276:1,9	245:10	caution	chance	167:6
277:2	259:15	31:15	97:15	checked
281:25	262:16	CBS	231:9	72:2
288:11,	275:4	230:23,25	239:19	checking
18,23	284:11	ceased	change	297:1
289:5,9	286:19	58:24	53:3	303:8,10
290:9,15,	306:19	center	192:1	307:1,2,
17,21	caseload	50:10	219:12,	12
291:1,5,	51:2,4	210:23	14,22	checks
13,18	cases	306:4	222:7	107:1,5,
CASA-	72:25	ceremony	changed	9,10,19
MANDATED	81:16,22	183:21	39:4	114:12
159:8	82:11,13,	certificate	53:18	133:19,20
CASA-	14,15,19,	39:7	192:18	chemotherap
RELATED	22 84:11,	Certificate	218:16	y
94:14	13 124:20	s	219:7	298:9
136:13	127:6	45:15	224:23	chest
144:19	181:21	certificati	charge	290:18
212:18	caseworker	on	55:24	Chicago
CASAS	49:8	45:7,11	56:1 73:4	158:5,6
124:10	Casey	chair	74:1 83:1	Chick-fil-a
172:21	89:19,20,	91:13	92:8	141:14
173:15	25	113:21	102:15	chicken
175:1	cash	chairman	127:2	141:5,12
206:19	141:21	17:4,17	138:17	142:9
213:7	142:8,13,	18:25	139:20,22	143:1
case	15	129:3	charged	chief
5:2,6	304:14,22	chairperson	83:5	78:23
6:3,6	cashed	107:7,8,	charges	79:10
7:5,18	304:23	15,18	179:7	92:9
31:23	casually	challenge	charging	266:2
47:18	145:6	134:9	78:6	301:22
48:4	catch	challenges	97:24	302:2
55:25	282:5	252:13	charitable	child
78:7 83:7	categories	Chamber	141:16	48:21
84:2,4	125:10	94:1	152:22	49:9,10
85:22	180:22	183:5,9,	175:20	53:7,10,
148:24	category	16	273:21,24	13 54:9,
168:4	121:24	Chamblee	Charity	17 67:6
191:7	caused	39:22	166:17,22	72:4,6,8,
199:16	257:10	check	check	14,16,18,
211:14	caused	133:12	166:22	22 73:12,
227:19,20				
228:11				
231:14				

GERALD BOSTOCK
BOSTOCK V. CLAYTON COUNTYOctober 14, 2021
Index: child's..Clayton-14019

14 75:18	183:6	51:5	33:5,8,15	174:13
82:14	Chilumuna	circumstanc	39:3,18	175:15,22
83:6,8,9,	73:19	e	40:8	178:4,13
11,13,16,	74:5	256:13	42:21	179:3
20 84:5,6	75:10,19	circumstanc	43:6	183:9
85:2,12,	76:2	es	52:6,11,	189:17
17 86:12,	142:5,21	90:18	14,25	190:4,7,
25 87:6,	160:13	Citizen	53:1	13,23
23 97:1,	256:9,10	53:8	54:4,20,	191:19,22
2,8	Chilumuna's	72:24	23 55:1,7	192:21
123:16	74:1	73:4,20	56:14	195:9
144:10	choice	141:23	59:17	204:18,
152:14,	101:8	142:4	62:13	20,21,23
15,18	choose	City	72:13,16	205:9,12,
185:7	124:18	240:1	73:5	15 206:17
191:9	151:17	civil	76:24	208:9,13
223:20	152:24	5:9	77:1	210:22
child's	chose	claim	80:1,20	212:20,
85:25	152:21	47:10	81:1	22,23
children	190:12	272:13	85:16	213:9
18:7	chosen	claimed	89:2,13	215:3
43:20	212:13	256:21	91:3,7	220:13
44:1	Chris	claiming	92:5,14	232:7
48:21	205:21	291:24	93:1,2,8,	236:3,4,8
49:4,25	207:7	class	17 94:6	238:12
64:9	208:6	145:20,21	100:7,16,	240:2
82:16	Christmas	190:5,8	23 104:2	244:10
87:17	17:11	Clayton	105:1,9,	263:7
88:2	18:8 97:2	4:6 5:3,	13,18	273:17
96:24	166:5	14 8:20	106:8,11	287:23
105:12	184:7	9:11,20	112:7,25	289:16
126:14	chronologic	10:22	115:18	290:9,16
155:20	al	11:7	117:23	291:5
179:25	146:24	14:24	118:13,	297:16
181:18	chuckle	16:24	14,16,17	300:25
184:6	170:18	17:3,9,12	124:20	304:18
223:25	chunk	19:18	130:16,	Clayton-
289:13	307:2,12	28:7	17,21	13914
Children's	circled	29:6,9,	131:2	109:21
166:16,21	279:10	11,13,16	143:18,25	Clayton-14
205:23	Circuit	32:3,4,	144:23	187:22
Chili's		11,12,14	145:20	Clayton-
153:21			151:11	14019
154:21,22			158:10,13	179:6
156:10			160:10,20	
			161:11	
			162:9	

GERALD BOSTOCK
BOSTOCK V. CLAYTON COUNTY

October 14, 2021
Index: Clayton-14022..committed

Clayton-14022 172:2	Clayton-376 106:25	closely 157:21	238:22 240:17 243:19	14:3 19:4,7 62:17
Clayton-14027 167:24	Clayton-493 252:2	closest 236:8	244:19 246:4 287:4	63:22 65:7 68:13,19 69:14
Clayton-14034 164:22	Clayton-508 252:3	clue 222:5	collaborative 77:1,18 145:12,17	87:14,20 209:15 252:12 258:19,20
Clayton-14051 161:16	Clayton-512 252:4,19	CNN 179:18 205:25 213:14	162:5,7 174:9,18 188:16 189:11	comments 14:8,13 15:17 16:20 17:5,19, 20 33:1, 3,15 34:3 36:15 58:15,24
Clayton-14068 159:2	clean 31:19	coach 209:7 274:24	190:6 290:20	61:17 63:13,20 69:22 87:16 248:17 253:13 293:7
Clayton-14074 158:4	clear 6:14 7:22 26:19 107:14 121:18 206:24 208:7 218:13 229:21 286:20	Cobb 77:1 144:23 162:9 174:4,7	collaboratively 77:17	61:17 63:13,20 69:22 87:16 248:17 253:13 293:7
Clayton-14075 156:9		COBRA 307:19	colleague 266:5	61:17 63:13,20 69:22 87:16 248:17 253:13 293:7
Clayton-14076 153:19		cocktail 282:6	college 45:1,5,22 48:22,24 236:6	61:17 63:13,20 69:22 87:16 248:17 253:13 293:7
Clayton-14149 180:7	cleared 257:6	Coke 277:18	color 86:24 87:4,10, 12	Commerce 94:2 183:5,9
Clayton-14152 182:8	clerk 52:13,20 67:17	Colin 10:3 13:18 14:5,12 31:12,25 35:12,25 36:2,17 64:22 70:1 78:22,24 79:10 204:8 213:21 219:20 220:2,4 222:2	combine 72:21 299:14	commissioners 17:4 251:14
Clayton-14155 184:14	clerk's 67:22		combined 53:7,9 73:4	commitment 84:18 213:11
Clayton-232 115:11	Cleveland 296:20		comfortable 40:11,13, 21	commitments 213:16 243:4 292:14
Clayton-248 245:2 247:25	clock 249:3		commence 119:17	committed 40:20,25 206:3
Clayton-371 104:3	close 40:1 141:15 181:13 188:3		comment 13:8,17	

GERALD BOSTOCK
BOSTOCK V. CLAYTON COUNTYOctober 14, 2021
Index: committee..content

277:2	complaint	152:13,18	297:16	300:24
committee	55:24	256:19	conference	considered
91:14,18	56:1,5	257:9,24	82:1,3	54:7
common	57:22	258:1,3,4	89:12	82:14
236:17	59:2,20	260:13,	144:17	85:8
commonly	62:12	19,22	158:7,9	108:14,
19:19	238:24	Con	confident	16,17,19
30:14	239:2	206:2	180:4	168:14,17
communes	248:24	213:17	confirmed	237:4
102:4	269:14	concept	84:5	273:23
community	complaints	280:4	conflict	consistent
183:18	58:21	concern	61:7	195:8
185:15	59:16	134:6	conflicted	construct
213:19	61:20	245:24	60:19	164:9
219:3	243:21	249:1	confrontati	contact
232:6	252:22	concerned	on	24:14
239:12,	255:9,14	62:23	256:9	178:22
21,25	256:4	246:5	confrontati	205:11
288:23	261:4	247:8,12	onal	249:19,
289:1	complete	249:11	243:12,16	22,24
309:2	7:9	concerns	confronted	250:14
company	237:18	60:7	257:3	contacted
51:10	completed	Concilia	confused	209:8
58:2 95:5	207:2	73:18	113:12	274:24
150:5	251:12	142:5	114:17	contacts
153:11,13	266:6	160:13	confusing	175:5
174:6,16	completely	256:9	291:12	177:16,17
276:10	243:17	concluded	connected	288:8,22
277:3	269:12	310:15	42:8	contemplate
compared	complicatio	concludes	connection	d
195:15	ns	310:12	57:23	126:4
197:9	296:3	conclusion	95:5	contend
302:10	complied	66:24	connections	32:6,15
comped	57:19	condition	175:5	219:20
242:12	complying	297:5	considerabl	220:1
243:7	67:7	conditions	e	231:19
complain	component	296:7	84:18	270:3,7
62:5	292:9	conduct	119:2	contending
254:3	comprehensi	152:2	considerabl	217:21
complained	ve	245:19	y	218:5
61:24	68:6 95:1	246:19	content	254:22
243:13	computer			

GERALD BOSTOCK
BOSTOCK V. CLAYTON COUNTY

October 14, 2021
Index: contention..correct

contention	control	187:17	16:3	115:5, 13,
110:14	102:8	199:20	20:5, 7, 8	18 116:2,
context	113:13,	214:4, 7,	21:19	16 118:4,
248:23	19, 22	16 222:9	22:3, 8, 9	14, 15, 18,
continually	129:24	290:3	23:4	24
65:15	245:25	297:3, 4	28:14, 22	119:21, 23
309:4	295:8	convicted	29:18, 22	120:12
continue	controls	46:1, 9	32:2	121:20
14:21	67:13	convinced	33:16	123:8, 12,
40:21	133:7	272:22	34:11	17 130:19
159:22	139:25	Cook	35:10	131:4, 6
174:6	convenient	142:5	38:20, 21	132:19
214:18	136:25	coolers	40:6, 9	136:18
301:16	conversatio	241:17, 18	45:23	137:4, 12
304:15	n	coordinatin	47:20	141:7
continued	13:24	g	55:2, 5	142:17
15:23	33:23	61:4	58:5 62:7	143:8, 11,
111:7	34:9, 23,	coordinator	69:7	16 144:2,
224:2	25 35:14,	50:11	70:6, 16	20 146:4,
251:22	23 38:14	53:2, 11	73:6, 15	11, 12
297:1	65:20	54:10, 18	74:12, 15,	147:10
continues	127:5, 7	73:14, 19	18, 20, 23	151:10
112:11	199:13, 14	coordinator	75:2	152:20
contract	200:11,	s	76:3, 15	153:3, 15
145:16	13, 15	145:6	77:9	157:1
contracted	201:17	COPS	78:14, 19	162:19
104:15	202:7, 10,	180:10,	79:23	167:4, 21,
contribute	12, 19, 21,	14, 18	82:20, 23	22 168:13
299:4	24 208:15	core	83:1, 2	170:1, 12,
305:17	219:17	122:19	84:12	16 171:7
308:4	220:5, 9	corporation	85:5	173:3
contributed	221:13, 22	101:22	88:6, 9	177:4, 21
96:12	256:20	174:20	89:4, 6	178:5
242:21	258:14	175:1	92:2, 11	180:9
296:8	274:15	177:17	94:8, 10,	181:1, 25
contributes	277:11	178:22	16, 19	182:11
305:18	conversatio	206:4	95:12, 15	184:17
308:9	ns	6:6 7:18	96:15	187:1
contribution	57:12, 25	9:1, 8, 9	98:8, 13,	189:3
305:7, 8, 9	114:8	10:1	22 99:2,	194:23
	118:8	14:24, 25	11, 22	195:5, 18
	126:7		102:5, 10,	196:12, 25
	128:9, 19		18 103:7	197:11,
	129:2		106:4, 5	14, 23
	142:22		107:16,	200:9
			17, 20	205:16
			108:10	206:7

GERALD BOSTOCK
BOSTOCK V. CLAYTON COUNTYOctober 14, 2021
Index: corrected..couple

207:22	costs	29:6,9,	118:13,	232:7
209:2,21	135:5	11,13,17	14,16,17	236:3,5,8
210:7	Council	32:3,5,	124:21	238:12
211:22	180:14	11,12,13,	128:13,16	240:2
212:4,20,		14 33:5,	130:16,	244:10
24 217:14	counsel	8,16	17,21	250:2
223:11	4:8 5:8	39:3,19	131:2	251:5,14
230:24	268:23	40:8,12	143:18,	253:24
231:4	counseling	41:1	21,25	261:22
232:10	254:12,	42:21	151:11	263:7
238:16	16,21	43:6	158:10,13	264:23
257:20		46:24,25	159:7,12,	270:9
265:5,11	counselor	47:19	18	273:18
266:7,16,	301:14	52:7,8,9,	160:10,20	280:14,22
24 268:22	counselors	11,13,15,	161:11	281:3
270:25	302:4	16,25	174:4,7,	287:17,
282:16		53:1	13	20,23
287:4,5,	counted	54:5,20,	175:15,22	288:11
11,25	95:24	24 55:1,7	178:4,14	289:16
292:1,2	168:25	56:14	179:3	290:9,16
293:17,19	counties	59:17	183:9	291:6,22
294:3	162:9	62:13	189:17,25	297:16
300:1	192:3,14	72:13,16	190:4,6,	300:25
301:3,7	290:22	73:5	7,12,13,	304:5,12,
305:2		76:24	17,20,24	18 306:2
309:12	Counting	77:19,20,	191:2,6,	309:4
	95:19	22 80:1,	19,22,25	
corrected	country	20 81:1	192:2,4,	county's
67:1	82:3	85:16	21 195:9	78:1,18
corrective	116:7	89:2,3,	198:19	101:23
67:20	117:7	10,13	203:22	county-wide
	158:12,19	90:11	204:18,	94:1
correctly	235:1	91:3,5,8	20,21,23	couple
54:7	238:7	92:5,14	205:9,12,	20:25
114:18	274:20	93:1,2,8,	15 206:18	50:13
149:16		17 94:6	207:25	115:13
169:25	county	96:6,7	208:9,14	134:14
218:1	4:6 5:3,	100:7,16,	210:22	149:12
cost	14 8:20	24 101:8	212:20,	164:21
133:3	9:12,20	102:7,23	22,23	169:24
234:8	10:22	104:3	213:9	174:4
	11:7	105:1,9,	215:4	180:7,16
cost-	14:24	13,18	217:21	187:21
effective	16:24	106:8,12	218:5	235:6
126:13	17:3,9,12	112:7,25	220:13	273:25
Costco	19:18	115:18	224:5	
166:6,10	28:7	117:23	226:12	

GERALD BOSTOCK
BOSTOCK V. CLAYTON COUNTYOctober 14, 2021
Index: couple-of-month..cut

couple-of-month	119:6,9 124:1,9, 21:15	223:15 224:5	116:10 117:5	24:16 29:2 250:15
court	10,14,21 125:15 126:9,19 128:11,17 140:2 151:23,24 152:3 160:8 168:4 170:4 174:19,25 181:13 199:8 201:20 217:3 219:12 226:10 232:8 244:14 248:25 249:20 253:24 260:3 266:3 268:8 273:7,13, 17 274:22,24 278:9 279:24 285:5 286:9,25 291:15 309:4	courthouse 141:6 231:11 courting 152:21,23 153:2 courtroom 84:1 87:5 126:18 127:9 191:11 courtrooms 168:23 courts 54:21 113:7 cousins 43:25 cover 114:13 135:4 145:16 234:8 299:14 coverage 209:7,18 covered 64:18 111:20,21 231:1 234:2 cowboy 284:7,8 coworker 56:22 57:1 coworkers 20:2 29:7 Craig	Crawford 33:24 34:10,17 35:11,20, 24 65:15 111:18 112:1,24 113:6,15, 20 131:25 132:10 135:12 136:11 274:6,8 276:18 Crawford's 34:13 36:12 108:22 109:11 111:2,14 115:25 116:19 crazy 208:13 create 127:16 145:10 309:3 created 21:9 53:6 97:11 107:23 134:12 295:7 creating 126:20 144:11 246:13 credibility 36:12 credible	credit 166:15 300:7 306:13, 15,22 crime 46:1 66:11 criminal 45:17 46:15 CROSS-EXAMINATION 8:1 crossed 77:12 crowd 241:22 Crown 276:11 277:7 current 39:12,24 40:2 162:18 289:12 298:19 305:3 curriculum 80:3,23 custody 82:17 87:18 152:16 customer 50:17 cut 47:8
court-	appointed 75:1 122:24 168:20 169:20 206:7,15, 25 court-	assessed		

GERALD BOSTOCK
BOSTOCK V. CLAYTON COUNTYOctober 14, 2021
Index: cutting..delete

53:24	203:13	210:23	decided	Defendant
277:18,20	284:14	deadline	60:6	4:10,12
cutting	dated	198:5	81:15	Defendant's
183:13	110:18	deal	126:8	92:14
cuttings	244:18	59:3	129:8,10	104:1
183:10	254:13	219:11	137:10,11	109:10
cycle	dates	274:3	138:20	115:9
251:12	24:4	dealership	141:24	146:15
	148:7	35:21	191:1	167:13
	284:19	201:4	220:12	193:8
D	daughter	dealing	288:16	195:14
	41:14	91:10	302:7	197:12
D.C.	44:9	decision	decision	203:6
144:8	David	Deb	72:21	238:1,14
DA	91:12	22:8	88:19	244:17
46:13	92:8	Debbie	103:5	251:25
DA's	104:14	198:25	109:7	254:11
34:15	257:13	199:3,10,	112:15	265:3
82:6	258:7,15	20 200:14	118:8	272:2
daily	259:7	201:12,14	119:5,8	275:11
87:12	day	202:10,25	127:15	278:4,16
298:13	35:8,9	debit	129:5	define
damaged	65:18	131:5,10,	130:1	94:23
164:12	69:16	11,16,19	134:10	98:17
dare	83:19	132:1,5	152:1	definition
199:24	145:20	133:25	304:13	85:1
Darlin'	162:6	134:20	decisions	degree
21:7	164:20	136:2,25	113:8	45:16,20,
94:2,18	202:9	166:8	129:25	21
95:22	212:15	171:21	173:12	degrees
100:25	235:7	debt	264:22	45:14
196:16	247:9	25:23	declined	Dekalb
206:4	257:5	December	277:6	52:8,9,
date	260:17	117:16	302:3	13,16
4:2 23:23	291:1	146:25	decorate	77:1
24:1	days	150:16,17	96:3	144:24
150:15	70:20	165:5	decrease	162:9
165:5	80:6	decide	296:5	189:25
172:14	202:11,	102:21	deed	190:6,11,
179:15	15,17	192:1	25:11	17,19
182:18	DBA	276:19	deemed	191:2,25
187:24	195:22	286:12,14	261:24	207:24
	dead		267:19	delete
			270:11	259:17

GERALD BOSTOCK
BOSTOCK V. CLAYTON COUNTYOctober 14, 2021
Index: deleted..digits

deleted 228:19,21 259:18	dependent 236:1	deputy 41:16,17 42:13	151:6	239:15 283:9 306:4
deliberately 247:18	depending 78:11 80:6 81:4 84:24	Derby 20:13,20, 24 21:7, 14,18,21 22:25 94:2,18 95:2,23 96:12 100:25 121:1 122:15 123:6 154:25 157:19 164:5,8 170:19 182:9,13, 16,23 184:15, 18,22 185:3,7, 11,24 187:5 196:16 197:3 206:4 240:10,11 242:4 243:4 244:9,11	designation 176:19	DFCS 72:25 87:17 96:25 181:5,14
delinquency 87:15,21 89:23	Depends 37:14		desire 91:17	desk 33:25 35:18 77:13
demands 107:6	depleted 307:13		destroy 259:17	diagnosed 224:21
demeanor 201:15	deposited 100:16 166:22		detail 193:6 203:25 266:1 269:5,8	diagnosis 224:14 225:5 294:18 295:12 296:24,25
demotion 301:5	depositing 101:23			diaries 15:5,7,22
denied 90:14,19 251:17	deposition 4:4 5:1, 24 8:4,10 9:4 94:5 108:22 109:12 111:14,16 113:4 132:11 281:18 284:16 310:13,15		detailed 122:6	diary 14:18,20, 23 15:11 16:18 69:2,10
department 40:16,24 41:5 42:14 48:20 49:4 53:17 57:14 67:22 92:9 265:4,5 272:3,12, 20 288:6 301:13	depositions 277:21	derogatory 14:12,13 15:16 37:12	determinative 270:14	Diesel 220:17
departmental 61:9 72:9	Depot 164:1		develop 21:14	difference 82:11 222:8
departure 170:23	depressed 292:19		developed 28:3 66:3,8,16 67:12 116:7 145:4 174:7,15 224:20	differences 206:23
depend 125:21 157:18 165:14 292:11	deprivation 82:14 84:3,14 85:2,17, 23 86:14 87:23 105:12 124:20	describes 118:20	developing 91:12 110:23 169:17	differently 42:19,21 43:1,6 232:3
		description 246:17	development 50:9 117:6 214:5	difficult 57:2,7,9 87:1
		designate 108:2		difficulty 257:1
		designated		digits 195:16

GERALD BOSTOCK
BOSTOCK V. CLAYTON COUNTY

October 14, 2021
Index: dinner..dollar

dinner	93:3,9	discriminat	dispense	doctors'
22:8,13,	105:1	ion	138:8	60:19
16 89:14,	directors	225:4	dispenser	doctrine
17	145:5	297:17	139:15	128:3
149:22,25	disagree	discriminat	displayed	document
154:19	112:3	ory	212:2	16:4
157:11	243:14,17	33:4	269:24	104:2
direct	disagreed	232:3	dispute	107:22
18:14,18	254:22	discuss	82:17	115:10
19:2	disallowed	8:6	167:20	117:10
92:24	66:20	158:18	193:12	118:19,20
109:19	67:3	198:1	223:3	120:13
219:16	disappear	203:19,21	dissolved	121:12
276:4	101:4	221:5	279:24	122:22,24
308:16	discharged	discussed	distress	126:4
directed	265:24,25	32:4 65:8	291:25	127:14
67:10	discourage	98:4	292:3	128:3,20
108:5	221:13	117:7	294:21	133:16
109:6	discovered	120:11	295:11	159:6
110:20	226:13	122:23	296:8,14,	170:6
direction	discovery	151:25	22 300:18	197:13
247:16	8:25	160:3	308:23	198:2,14
directives	231:15	171:5,9	309:1,25	205:3
219:16	275:4	182:16	Distributin	238:15
directly	discrepanci	222:7	g	265:20
11:17	es	225:2	276:11	267:23
18:7	272:22	248:3	277:7	268:10,15
73:18	discriminat	255:5	District	269:5,9
74:6	e	261:5	5:4,5	272:2,23
75:6,12	85:13	272:19	109:13	275:12,20
76:14	86:12	281:17	documentati	on
99:25	discriminat	282:13	divorced	34:19,21
100:6	ed	discussion	47:23	275:3
132:14	65:3	122:7	doctor	documents
134:2	224:15	242:19	60:21	8:9,25
143:18	261:20	discussions	301:12	39:2
205:9	263:14	257:4	doctor's	163:2
259:7	264:5	296:13,21	61:2	252:4
285:15	269:11	disgruntled	294:16	264:25
301:17	284:12	256:22	295:21	278:19
director	284:12	280:11	doctors	Dodge
53:13	dislocated	dislocated	295:9	97:21
59:24	50:11	50:11	dollar	
61:5 67:6				

GERALD BOSTOCK
BOSTOCK V. CLAYTON COUNTYOctober 14, 2021
Index: dollars..educate

165:1,7	doubled	184:6,8	244:8,11	e-mails
305:12	196:11	driving	duck-themed	146:10
dollars	doubt	46:8	21:1,5	earlier
144:11	36:11	drop	96:9	33:2,7
donate	draft	60:17	Duckorate	62:17
170:14	104:13	251:22	96:4	65:8
184:1	111:1	drove	Duckoration	70:12
189:8	115:25	77:19	96:1	115:24
213:8	116:3,4, 7,18,25	drunk	ducks	132:22
donated		46:8	21:10	141:3
152:11,13	drafted	Dually	95:23	173:19
donating	116:15	97:21	96:5	176:17
152:18	drafting	duck	due	180:15
173:16	92:21	20:13,20,	159:10	202:15
donation	104:10	23 21:7,	281:15	214:9
95:10	117:4	14,18,21	309:14	217:20
165:4	drafts	22:25	dug-out	218:4
180:10	107:5	94:2,18	212:12	222:7
181:18	Dragon	95:2,23	DUI	227:5
188:18	206:2	96:3,8,12	46:9	255:12
donations	213:17	97:22,24	Dunkin'	259:5,6
95:11	drawn	100:25	156:11	260:17
99:15	210:10	121:1	duties	287:3
174:18	drinker	122:15	83:3	308:19
188:14	220:16,19	123:6	246:16,17	earlier-
215:3	drinks	154:24	duty	226:20
273:21	149:14,17	157:19	52:18	early
donor	236:14,20	164:4,7	280:15,23	225:22
121:10,11	drive	170:19	DWI	234:23
163:20	10:16	182:9,13,	46:10	easel
206:3	47:10	16,23	East	184:25
224:1	98:6	183:4	E	185:4
donors	217:2	184:4,15,		
121:2,13	driver	18,22		
201:24	47:2,5,13	185:3,7,		
232:7	drives	11,24		
Donuts	18:8	187:5	e-mail	Easter
156:11	96:22	196:16	67:6	235:7
door	150:19	197:3	209:11,13	economic
169:9	165:4	204:14,17	227:11	85:10,18
174:21	182:23	206:4	278:5,17,	Ed
		240:10,11	24 279:2	4:15
		242:3	280:8,13	educate
		243:4	282:1	223:20

GERALD BOSTOCK
BOSTOCK V. CLAYTON COUNTYOctober 14, 2021
Index: education..environment

education	219:22	employees	encouraged	engagements
45:9		11:13	244:4,12	93:25
Edwin	embarrass	32:3	encourageme	enjoyed
205:24	27:13	33:8,16	nt	301:10
EEOC	embarrassin	57:13	63:16	ensure
55:24	g	58:1	encouraging	224:1
227:17,	309:5	89:14	63:13	291:4
19,22	emergency	118:16,17	end	entail
228:11	298:2	173:10	49:12	84:18
246:6	Emory	245:9,22	68:25	entailed
269:2,12,	292:17	254:3	71:5,11,	256:24
14 304:15	293:5,7	255:13	22 100:20	enter
effect	emotional	260:2	175:4	183:4
17:25	291:25	262:13	188:8	Enterprises
62:25	292:3,15	employees'	220:7	49:1
115:17	294:21	56:24	223:9	entertain
124:9,16	295:11	employer	234:21,24	289:6
208:12	296:8,14,	48:24	235:4	entertainme
216:3	22 300:18	56:2,5	250:7	nt
239:23	309:25	62:12	252:20	239:21
259:22	employed	218:20	276:22	entire
effective	17:9 39:3	226:22	287:20	61:14
125:14	56:13	227:8	289:17,23	231:3
effort	80:20	228:7	292:16	entitled
144:23	178:4	269:16	300:13	104:2
150:19	250:19	289:12	ended	entrance
172:19	251:19	305:3,8,	13:25	212:13
179:17	253:23	18 306:3	24:10	entries
	289:11	308:4,9	25:18	14:24
efforts	employee	employers	28:10	15:11,15
76:21	32:13	56:8,9	39:1	16:18
128:5	90:11	59:17	49:13	69:11
150:12	145:16	employment	101:7	147:4
157:23	178:14	11:7 28:7	257:4	168:6
159:23	226:11	55:1,8	279:23	193:19
172:24	232:16	115:18	enemy	194:7,22
174:2,6	245:19	256:18	292:8	entry
190:23	254:25	282:11	enforcement	15:20
192:9	255:4	288:16	42:25	environment
208:8	256:22	299:25	43:7	40:22
289:8	261:4	encourage	engage	
eight-hour	269:17,18	78:4	105:18	
81:18	280:11	170:14	106:13	
else's	297:16	213:7		

GERALD BOSTOCK
BOSTOCK V. CLAYTON COUNTYOctober 14, 2021
Index: equates..expenses

60:4, 15	96:10	evidence	146:15, 19	124:1
245:10,	143:7	5:10	167:13, 15	expenditure
12, 23	144:19	211:14	188:3	138:8
246:13	146:6	evidenced	193:8, 15	expenditure
247:8	154:11, 16	213:10	195:14, 23	s
equates	157:22	281:22	197:13, 16	66:6, 19
213:19	162:16	exact	203:6, 8,	67:2
equivalent	164:20	17:18	10 205:4,	111:6
50:24	181:10, 19	24:4	13 216:25	114:13, 15
errors	182:1	39:20	217:3, 5,	133:8
67:18	183:1, 3,	208:11	10 229:9,	150:10
establish	16, 18	272:18	23 238:1,	157:20
83:12	186:3	EXAMINATION	15, 18	187:7
established	187:14	308:16	244:17, 22	expense
102:11	196:19	309:8	251:25	77:4, 8
111:8	220:17,	examples	252:6	78:12
135:20	23, 24	174:4	254:11, 17	89:2
establishme	239:8, 12,	215:23	265:3, 7	90:12
nt	24, 25	excellent	272:2, 6	134:2
155:3	240:16	262:15	275:12, 14	136:14
estranged	241:3	exceptions	277:14	138:25
44:2	276:25	235:6	278:4, 6,	139:14
ethic	289:19	excess	16, 21	140:20
246:15	290:5, 19	78:3	exhibits	157:14
evacuate	291:2	107:10	195:1, 16	159:4
14:1	297:23	exchange	238:2	163:22
evaluated	events	111:17	exist	165:1, 21
251:4	7:21	excluded	100:25	170:2, 3
evaluation	20:14, 20,	114:7	131:2	172:9
251:7	25 94:1	129:2	existed	178:8
evaluations	95:17	excuse	130:17	183:6
252:2	96:13, 16,	20:7 28:3	250:21	expensed
evening	23 98:1	130:10	existing	189:5
145:21	122:16	166:6	121:10	expenses
256:24	141:4	182:25	exit	132:22
297:14	144:15	263:15, 23	40:1	149:12
event	145:19	exhibit	287:18	153:22
21:2, 13	154:25	92:14, 18	expect	158:4
89:9 94:3	170:7, 15,	104:1, 7	60:18	163:6, 11
95:13	19 173:17	109:10, 16	296:1	179:14
eventually	244:2, 3,	111:12	expectation	184:15
223:21	6, 7 276:9	115:9, 20	246:15	185:12
	289:21, 23		expected	186:2
	290:14			284:5, 17

GERALD BOSTOCK
BOSTOCK V. CLAYTON COUNTYOctober 14, 2021
Index: expensing..FCCC

285:16	explore	facilitator	193:22	FCC
291:11	286:24	s	244:21	94:23
299:15	expressed	60:1,5	269:11,12	273:9
expensing	12:14	fact	272:5	FCCC
171:13	207:7	15:22	280:4	94:6,9,
expensive	249:1	23:1	283:4,5	13,20
126:3	extent	37:21	families	95:17
experience	64:11	38:8,9	85:2,3,7,	96:21
85:16	118:10	88:1	9,17,18	98:11,20
121:6	293:15	218:6	86:3,14,	99:8,13,
292:20	external	223:14	15 88:3,	24 100:6
293:2	298:10	factor	22 98:24,	101:12,21
302:7	extremely	270:14	25 99:20	102:3,8,
experienced	139:13	factors	119:2	14,16
252:12	eye	269:24	family	103:6,8
261:17	62:24	facts	23:3,8	104:24
263:6	63:5	224:17	38:24	105:17
294:22	248:19,22	fair	43:22	106:3,22
300:17	eyes	6:22	44:2,19	107:16,20
experiencin g	54:9	19:17,23	48:20	108:1,5,
296:15	F	71:18	49:4	8,14
expert	F	126:12	127:16	109:6
179:23	F.r.o.g.s	127:8	237:17	110:9,15,
expired	283:15	241:4,6	296:13	21
250:2	F.R.O.G.S.	249:6	Fann	113:19,21
Explain	172:3,11	262:14	169:5,12,	118:3,9
205:20	182:8	288:20	20	125:9
265:25	face-to- face	fairly	fantastic	127:12,
explained	288:7	122:6	301:12	15,17,21
explanation	Facebook	fall	fashion	128:7,12,
14:19	43:9	176:6,7,8	143:5	14,23
15:20	228:21	213:23	145:25	129:8
42:6	facilitate	229:5	146:4,7,	130:16,17
113:20	163:9	fallen	10 179:22	131:3,7
114:2,16	facilitator	264:14	213:13	132:14,16
196:15	59:22	falls	fast	133:1
250:22	80:7	182:5	101:5	136:12
explicitly	301:10	290:2	father's	141:9
265:19	facilitator	false	43:24	143:5
	59:22	247:14	fault	153:5
	80:7	familiar	280:1	168:12
	301:10	87:16	favorable	169:14
			253:14	184:2
				185:10,18
				186:1,16,
				19 187:18

GERALD BOSTOCK
BOSTOCK V. CLAYTON COUNTYOctober 14, 2021
Index: feasible..food

195:19	fees	83:11	financial	fiscal
196:3,10	124:9	fields	54:1,10	100:20
215:20	145:16	235:8	85:22,25	fist
239:24	223:15	236:2	174:17	35:18
244:7	224:5	figure	292:10,14	fists
273:5,12,	234:3,5,6	302:14	303:2	33:25
23 289:20	273:6,13	figured	307:5,6	fit
290:3	fell	10:7,11	financially	158:16
291:9,19,	165:24	file	53:21	213:4
20	214:22	246:6	find	fits
feasible	felt	259:20,	175:3	213:2,18
190:13	12:4 16:5	21,25	221:2	flag
February	40:11,15,	260:1,7	236:1	9:15
110:19	19,23	269:1	250:25	flags
193:11	42:17	filed	288:2,10	210:2,5
291:3	43:1	5:15	findings	235:13
federal	75:18	47:10,25	66:8,15	Flavors
5:9,10	127:8	55:25	117:8	156:10,
66:12	132:4	140:3	282:13	16,17
89:22	137:16,17	238:24	finish	flexibility
144:11	165:24	239:2	160:25	214:21
304:16	170:5	files	finishes	Flock
fee	185:14	260:4	31:17	95:19
119:13,18	186:13,15	fill	fire	Florida
120:4	201:15,20	304:14	92:9	51:5
125:19	223:16	filled	199:2	fluctuate
178:18	225:21	208:3	fired	214:19
feel	241:1	267:6	55:9	focus
15:24	242:20	filthy	199:11	191:21
16:6,11	243:11	159:15	200:4,8,	focused
40:13,21	295:8	final	14,19	49:25
60:3,15	301:15	113:10	201:1	180:21
61:12	female	finalized	203:3	190:23
76:5	10:25	101:16	208:14	focusing
180:4	11:12	finally	209:14	69:8
264:22	146:8	25:21	218:14,17	follow-up
265:25	232:16,20	145:7	224:19,23	243:12
295:6	291:15	finance	225:8	308:14
feeling	females	128:13	227:7	food
198:24	11:15	273:19	262:16	49:8
295:10,11	12:13	firm	firm	
297:2	fence	47:11	174:11,20	
feels	212:11	field		
245:20	field			

GERALD BOSTOCK
BOSTOCK V. CLAYTON COUNTYOctober 14, 2021
Index: footage..full

166:7,10,	105:20	218:22	forwarded	friction
20 239:23	106:14	221:23	304:12,21	281:19
footage	107:21	223:4	foster	Friday
210:5,10	108:9	224:8	49:9 84:7	35:13
football	109:2	225:1,20	152:15	200:22
83:10	110:16	226:15	181:5,11,	202:9
Foothills	113:24	231:5,16,	17,23	friend
160:7	117:25	23 232:11	foul	17:1
force	118:5	237:1,10	257:11,22	25:2,3
41:2	119:4	245:13	found	friendly
244:2,10	120:5,19	246:8	51:16	13:2,7
forcing	121:14	249:18	70:8	18:15
244:1	122:9,17	251:20	131:18	friends
Ford	123:1	253:16	159:18	17:3
66:6	125:2,22	254:6,12,	199:21	91:3,7
forget	126:16	16,21	210:2	92:5,14
235:12	127:23	255:16,25	220:2	93:1 94:6
forgot	129:17,23	261:6,16	227:8	104:2
135:7	130:8,23	262:4	228:7	112:7,25
form	131:21	263:10	257:8,9,	172:17
5:17	132:7	265:3,16	10 260:13	204:20
15:18	133:10	267:10	Foundation	212:23
16:14	134:4,25	268:3	89:19,20	213:8
19:21	136:4	269:21	fourth	215:3
23:25	137:3,24	270:6,16	245:21	237:18
26:6 32:7	138:9,19	271:4,14	275:24	240:2
33:6	139:2,9	273:8	frame	246:18
37:13	143:19	276:3	217:7	273:17
38:11	153:16	279:21	230:5	296:13
68:20	156:25	280:9,17	friendship	28:2
77:8,22	157:16	281:6,8	freeze	front
83:14	165:13,23	294:24	230:5	210:3
85:11	173:25	formal	freeze-	212:13
86:8	177:8,22	91:21,22	frame	285:5
87:13	185:13,19	145:11	229:11,22	290:17,
89:5	186:8	Formalwear	frequent	23,24
90:15	187:6,16	17:8	81:4	fruits
92:1	189:18	formed	294:8	186:6
93:18	190:18	101:12	frequently	frustrated
98:14	191:17	fortunately	70:19	101:3
100:2	192:16	47:2	156:14	full
101:13	196:13	forward	234:16	38:19
102:9,24	199:18	63:13,15		
	203:23	251:16		
	205:17			
	209:24			
	213:25			
	215:5			
	217:24			

GERALD BOSTOCK
BOSTOCK V. CLAYTON COUNTYOctober 14, 2021
Index: full-day..gave

57:20	funding	136:1,3	25 107:25	276:17
58:5,19	78:12	138:1,8	108:6,14,	279:11
109:24	142:7	145:25	19 109:1	289:24
166:7	279:25	151:6	110:8,15	291:17
234:14	280:2	153:14	111:20	Galbraith
286:5	281:16	169:14,15	113:5,14,	76:12
full-day	fundraiser	171:15	18,23	257:19
89:12	21:6	190:16	118:22	Galbraith's
full-scale	94:17	214:21	127:1,16	282:4
223:22	143:5	215:2	128:7,24	gallbladder
full-time	146:3	231:20	129:9	-related
71:6	fundraisers	232:17	130:4	298:7
fully	95:1,18	236:19,25	131:6,12	GALS
296:2	98:2	240:9	132:5	83:1
Fulton	99:15	250:3	133:8,17,	123:24
46:24,25	fundraising	273:3,5,	20,25	game
47:18	20:13	12 275:22	134:13,	234:16
77:2,19,	99:9,25	279:11	17,20,23	235:5
20 144:24	105:19	292:12	135:16,19	236:12
145:19	122:15	299:14	136:3,12,	games
162:9	128:5	302:3	17,20,25	212:2,4,
207:25	141:4,8	306:25	137:15,21	10 234:11
fun	144:15	308:25	138:7	235:14,
237:23	173:17	funny	140:6,17	20,23
function	220:17,23	12:20,25	142:10	garage
22:25	funds	future	146:16	281:23
94:20,23,	67:7,18	26:2	149:6	Garden
24 135:6	78:7 89:3	153:2	150:10	168:10
functions	93:4	170:15	153:10,14	169:10
20:11	94:9,14	<hr/>	165:21	gather
29:6	96:14	G	166:22	204:2
78:17	97:19	<hr/>	167:6,19	gathering
98:11	99:14	gain	169:14	83:13
99:10	100:12,21	54:11	171:14,21	145:11
135:3	101:4	139:8	178:9	gatherings
290:15	105:3,23	GAL	186:3,5	236:21
fund	106:9	51:7	187:12,18	gave
120:11	108:19	67:7,10	188:19	100:6
291:8,18	110:8	77:11	190:16	109:13
funded	112:6,22,	81:16	192:10	137:25
143:22	25 113:2,	82:21	193:10	138:5
289:24	16 127:22	88:21	195:1,11,	
	128:24	90:23	20 215:2	
	129:9	99:3,19,	232:17	
	132:14		236:19,25	
			273:3	
			275:22	

GERALD BOSTOCK
BOSTOCK V. CLAYTON COUNTYOctober 14, 2021
Index: gay..graduated

143:24	228:7	59:19	39:4,6	gold
201:7	231:21	62:11		159:7
227:2	232:4,5,	81:24	gift	
230:22	20,21,24	143:7,9,	181:4,8,	golfing
231:8	261:9,14,	14	23 182:3	266:25
274:8,10	21,24	144:14,	188:13,18	good
308:19	262:2,17,	16,21	189:8	5:11,12
309:22	24 263:20	145:7,10,	give	67:12
	267:17,19	17,23,24	4:21 6:9	76:13
gay	268:2,20	146:1,3,6	7:9 11:14	93:16
9:8	269:17,	152:20,23	55:20	141:19
13:12,21,	18,20,23	159:8	94:25	161:1
22 14:3,	270:4,5,	160:4,7	99:24	185:25
18,22	11,13	161:19	103:4	231:9
15:16,23	271:20	162:21	111:9	253:20
19:14	284:24	163:12	123:10	262:15
23:7,9,16	285:19	172:3	143:17	272:23
29:17,22	287:10	174:12	174:3,10	274:16
30:5,11,		179:22	205:14	276:15
15 31:4,	GB	180:16	242:25	301:15
10 32:1,	167:2	192:8,14	250:22	Goodness
6,16		213:13	265:24	217:4
33:24	general	265:5	286:3	
34:1	63:6,8	272:3	290:9	Gossett
35:15,18	165:1,7	276:8	310:2	29:22
36:21	201:14	277:2,6		30:17
37:8,22,	254:15,21	288:22	giveaway	31:3,10
25 38:3,		296:20	240:13	32:1 83:1
7,9 57:13	generally	301:4	giving	199:1
58:2,15,	62:1 87:9	306:4	37:6	201:18,25
16,17	130:15	308:2	113:18	202:12,22
65:12,15,	154:24		180:23	266:11
22 69:2	190:15	Gerald	231:13	267:8,15
70:2	239:7	4:4,5		270:22
176:11,	272:18	5:1,2	GLA	
16,21,24,		38:19	231:20	govern
25 177:2,	gentleman	39:5,10		127:11
10 198:22	229:24	110:2	Glaze	128:4
199:2,5	230:1	112:14,21	114:12	
209:14	gentlemen's	209:13	glowing	government
218:14,	26:24	224:19	218:15	16:24
15,19,21,	Georgetown	283:21	224:21	32:13
25 219:1,	39:21			33:9
3 223:15,	Georgia	Gerald's	goal	89:10
17 224:18	4:7 5:5	284:24	192:5	
226:6	44:22,25	Gerry	Godette	gracious
227:7,8,9	45:8 50:9	38:24	292:18	217:4
	56:17		293:6	graduated

GERALD BOSTOCK
BOSTOCK V. CLAYTON COUNTYOctober 14, 2021
Index: grandchildren..Havoc

49:2	Griffin	257:25	181:17	192:18
grandchildr en	74:16	guessing	handed	200:11,
30:23	266:15	17:13	13:25	12,21
Graniela	Grill	166:6	279:6	201:16
90:5	163:12	295:25	287:15	236:17
161:13	ground	guy	handle	267:1
171:4	6:3	229:12,	76:23	happened
grant	group	14,15,18	handled	19:14
64:17	18:5	274:9	66:1,7,	21:21
66:1,6,	60:23	275:17	14,22	42:4 60:8
10,11,14,	61:14	278:5	72:24	63:18
16,18,19,	77:18,19	guy's	75:23	68:13
22 67:3	80:10	283:23	129:5	142:24
78:9	97:12,19	guys	handling	156:14
89:19,20	102:14	187:3	67:7,18	202:13
125:10	142:6	216:10	hands	208:25
143:21	145:4	220:20	199:23	228:17
166:17	151:14	276:23	handwriting	241:9
251:12,13	240:19	284:20	147:3,9	261:7
291:10	grow	Gwinnett	155:6,8,	264:17
grant- funded	44:22	77:2	10	270:17
250:1	214:18	144:24	161:18,	271:8,16
251:11	guardian	162:10	21,23	275:10
grant- related	50:23,25	<hr/>	163:4	289:23
79:12	51:15	H	167:1	happening
grants	88:20	<hr/>	168:2,5	166:16
11:25	180:5	half	172:4,7	happily
63:25	195:22	168:3	180:8	289:11
64:3,5,6,	223:24	halfway	182:10	happy
12 78:16	guardians	66:19	184:16	198:19
283:10	97:5	hall	188:11	267:16
great	124:23	154:20	193:18,22	hard
63:17	125:16	222:13	194:1,4,	86:24
Greenleaf	204:15	hallway	9,16,20	101:3
49:18	206:9	9:14	handwritten	157:17
Gregory	guess	11:18,19	147:1	181:21
44:17	20:10	hand	Hanson	187:24
grievance	76:17	73:23	230:9	309:3
56:1	78:3 85:1	129:6	happen	hardworking
	86:23	hand-in- hand	69:3	150:12
	125:20		101:11	hat
	152:7		165:19	60:18
	199:17		173:12	Havoc
	212:8			

GERALD BOSTOCK
BOSTOCK V. CLAYTON COUNTYOctober 14, 2021
Index: head..Hill

229:5,6	125:15	hey	93:20	149:1,2
head	152:4	52:19	98:15	153:17
6:12,13	heated	55:15	100:5,13	158:1
264:2	242:19	103:14	101:17,25	160:23,25
headquarter	Heery	188:1	102:12,19	161:3
ed	174:19	233:3	103:2,13,	165:18
150:6	175:1,5,8	277:13	23 104:9	166:1
health	177:16	hide	105:25	167:17
59:24	178:22	9:15	106:19	174:1
289:14	206:4	high	107:24	185:16,22
299:21,24	held	44:24,25	108:7,11	186:14,22
301:14	65:14	Highland	109:8,18	187:9,20
302:4	81:25	220:18	110:24	188:2,6,
307:23	94:4	highlight	111:11	8,10
308:5	180:16	239:20	113:25	189:22
Healthcare	181:10	Hill	114:19,22	190:9,21
205:23	212:10	4:10,25	115:3,22	191:18
hear	214:4	5:13,22	118:2,12	192:22
6:18	235:24	6:1,8,12,	119:7	193:4,17
88:18	239:13,14	16,21,24	120:6,23	194:14
308:23	256:25	7:7,12,	121:17,25	195:25
heard	289:25	16,20	122:12,20	196:20
33:2	helped	8:2,17	123:4	197:18
34:12	21:14	16:1,13,	124:2	203:12
52:10	174:16	16 19:24	125:3,24	204:4
87:10,14,	helpful	24:2	126:10,22	205:19
20 88:15	98:16	26:8,15,	127:10	210:4
90:1	helping	18,21	128:1	211:6,10,
207:8	182:23	27:1,7,9,	129:19	12,17,19
hearing	276:1	12,21	130:3,14,	214:6
72:25	Henderson	31:17,22	24 131:23	215:8
84:3,14	17:7,23	32:10,21	132:9	216:8,12,
85:3	Henry	33:12,14	133:15	15,17,20,
86:14	255:10	37:16	134:18	23 217:1,
hearings	256:5,11	38:15	135:9	9,12
82:17	Heretic	55:16,20,	136:9	218:2,10
85:17	229:5	23 59:5,	137:8,14	219:5
88:4,8,	Heritage	8,14 69:5	138:3,12,	221:25
13,23	65:14	85:14	22 139:5,	223:8
98:25	Hewitt	86:1,10,	11,19	224:11
105:13	174:4,25	17 87:19	140:5	225:7
118:23		89:7	146:21	226:1,18
124:10		90:17	147:5,13,	229:10,16
		92:3,20	19,21,22	230:6,7
			148:5,9,	231:7,18,
			14,17,19,	25
			22,24	232:13,23

GERALD BOSTOCK
BOSTOCK V. CLAYTON COUNTYOctober 14, 2021
Index: hired..humor

233:4, 8, 10, 18	22 310:3, 6	84:6 159:20 163:18 164:1 218:25 247:15 298:17 299:17 307:3	host 276:21	25:4, 5, 12 72:2 299:17
237:5, 22	hired		hosted	
238:20	145:17		154:24	housed
244:13, 15, 24	256:23		179:23	108:15
245:16	history		hostile	houses
246:11	51:16		60:4, 15	239:18
248:7, 11	hit		61:13	how's
249:21	198:18	homophobic	245:10, 12, 20	140:20
251:23	243:7	12:5	246:13	HR
252:8		15:25	247:8	56:4, 6, 25
253:19	hit-and-run	16:10		57:14
254:9, 19	46:19	33:4, 17, 21 40:20, 25 41:3	hot	60:6
255:20	48:3		241:17	62:5, 12
256:2	199:16		Hotlanta	
261:11, 25	hold	223:17	68:22	HSL
262:9	128:7	225:24	69:15, 20, 25 70:9	175:9, 12, 18
263:1, 12, 24 264:7	144:15 145:22	263:6	176:2	176:13, 20
265:9	159:9	honestly	177:1	177:6, 13, 18, 20
267:12	268:12	80:15	177:1	18, 20
268:6, 24		250:8	198:20	178:25
270:1, 12, 20 271:5, 17, 24	holding	293:12	201:21	205:10
272:8	165:5	295:17	217:23	207:20
273:11, 20	273:12	Honey	220:3	210:14
275:16	Holland	229:2, 7, 13	226:8	212:10
277:4, 15, 18 278:2, 10, 12, 23	26:9, 13 27:20 28:1, 8, 17 29:1, 5 70:14	230:14, 16 234:12 274:24	270:8 274:18 276:12	218:7 221:6, 21 222:22
279:9	227:5, 10, 14, 19, 25		hour	223:2
280:3, 12, 21 281:4, 7, 10	228:5, 12	hoped	55:19	233:21
284:1, 15, 22 285:2, 6, 8, 15, 18, 24	home	97:21	233:5	235:10, 17, 18
286:10, 23	10:16	hopes	250:25	237:8
287:1	24:25	152:24	hourly	
295:2	25:3, 17	hoping	125:21	Hudson
302:13, 18, 24	28:18	163:19	hours	90:6
286:10, 23	29:10	180:3	80:12, 14	161:14
287:1	39:18, 24	horrible	81:3	hugged
295:2	40:3, 7	159:15	84:21	63:19
302:13, 18, 24	42:3, 19	hospital	242:14	human
308:11, 15	43:1 44:1	49:17	247:9	161:7
309:9, 19,	71:10, 25	292:17	256:24	179:24
		293:8	house	humor
			22:12, 15	12:24

GERALD BOSTOCK
BOSTOCK V. CLAYTON COUNTYOctober 14, 2021
Index: hundred..individuals

hundred	146:20	13:17	in-kind	92:15
283:1	167:16	36:24	120:25	101:21
husband	193:16	65:1, 20	inappropria	102:11
44:10	195:24	175:16	te	104:21
husbands	197:17	209:8	56:25	incorrect
97:13	203:11	227:13	57:17	131:8, 9
	217:6	immensely	256:13	205:18, 20
	238:19	301:10	Incentive	increase
I	244:23	impacted	66:1	54:2
	252:7	191:10	incident	93:3, 14
I.E.	254:18	impacting	11:4	97:6
250:19	265:8	190:3	42:24	105:2
idea	272:7	impair	63:18	301:25
86:7	275:15	7:13	256:8, 10,	increases
88:25	278:7, 22	implement	12, 17	54:25
112:5	identified	160:18	258:13	55:4
126:12, 24	57:13	180:25	include	incurred
128:7	58:1 67:1	implementat	60:24	25:23
132:4	176:11	ion	93:16, 21,	individual
141:20	198:22	283:10	24, 25	24:17
156:24	identify	implemented	96:16	29:2
165:2	4:8 9:8	66:3, 17	120:20,	99:15
167:9	82:5	67:12	21, 24, 25	133:18
170:17	193:7	implication	121:2	139:16
199:25	205:15	218:13	included	143:14
212:1	284:25	important	77:1	172:18
222:21, 23	identifying	96:8	90:13	188:22
224:9	229:24	139:13	144:23	234:6
246:1	III	170:6	146:7	249:17
274:16	50:11	185:14	240:20	269:23
276:12, 15	IKEA	including	individually	
279:19	155:25	10:17	242:17	
ideal	156:1	impression	individuals	
274:2, 5	image	18:12	29:17	
ideas	185:6	19:1, 8	67:25	
158:18, 20	204:16	improperly	95:11	
160:17	imagine	66:16	121:23	
180:24	79:4 90:2	improve	135:5	
identificat	126:1	82:8	incorporate	
ion	292:5	171:11	d	190:8
92:19	308:6	improvement	170:20	207:6
104:8	immediately	54:19	incorporati	222:25
109:17	11:21	160:9	on	229:7
115:21				258:3

GERALD BOSTOCK
BOSTOCK V. CLAYTON COUNTY

October 14, 2021
Index: indulgence..involved

indulgence	108:3	61:10	internet	introduced
216:7	111:6		231:3	50:23
	114:8	instrumenta	288:7	51:7 58:9
inference	129:4	l		
210:11	145:5	64:4	interpret	introductio
influence	174:5	insurance	18:17	n
231:14	249:8	47:9	113:18	15:21
influx	301:20	50:15	interpretat	investigati
196:19	Initiative	292:6	ion	on
224:2	54:19	299:21,24	121:3	46:13,15
info	inmates	307:19,	interpreted	119:17
205:11	159:13	20,24	13:6	227:18,23
		308:5	14:13	304:15
information	Inn	intake	33:3	investigato
16:9 37:6	155:23	49:21,22	42:15	r
44:5	inside	intended	200:18	48:21
65:13,21	159:16	105:18	227:1	49:11
83:14	Instagram	106:12	interrogato	272:12,20
160:4	43:13	272:17	ries	304:17
163:9	installed	intent	197:21	invitation
203:20,21	257:23	93:11	interruptio	277:6
204:3,6	instance	142:3	n	invited
220:11	34:16,22	214:17	8:14	89:13
243:8	42:25	215:12,	interview	181:12
265:4,13	123:6	14,22	209:19,22	220:20
information	135:1,15	216:1	230:22	281:22
al	instances	231:17	231:9,13	282:5
92:6	34:4	279:22	282:14,17	inviting
informed	255:13	intentional	308:19	232:5
36:15	instructed	ly	interviews	involuntari
301:22	58:5	192:17	227:2	ly
informing	135:4	interact	309:10,	55:9
64:22	304:16	247:19	11,13,15,	involve
infractions	instructing	interest	20 310:2	85:21
68:8	58:19	12:14	intimidated	involved
initial	112:21	105:12	252:25	27:13
49:24	instruction	207:7	intimidatio	64:2
80:21	31:16	interested	n	82:16
81:2,5	285:13	11:1,16	252:24	83:6,9
209:19	286:4,6	199:21	introduce	84:11
initially	instruction	intern	14:20	92:4,21
21:12	s	116:5,9,	20:16	104:10,16
71:1		12		105:12
100:9,12				117:3

GERALD BOSTOCK
BOSTOCK V. CLAYTON COUNTYOctober 14, 2021
Index: involvement..judge

128:9		64:12	31:9	228:7
153:11	J	76:18	36:18	230:16
175:11		84:20	37:2 38:5	237:12
221:9		246:16	62:18	261:20
276:7,8	Jane	269:20	63:2	262:2,24
277:9	11:23	271:11,13	64:22,24	263:20
283:18	12:3	287:22	65:8,18	270:7
	62:16,21,	288:10	68:12	
involvement	22 63:23,	289:21	70:1	joining
118:10	25 79:7,	300:23	74:19	68:25
178:25	11 114:11	301:4,9,	78:25	175:2
293:15		23 302:1	79:2	201:21
	January		197:22	217:22
irrelevant	10:1 91:5	jobs	198:2,5,	218:24
286:16	146:24	55:10	10 204:8	232:4
	177:14,20	288:2	219:20	261:9
issue	193:11		220:2,5	262:17
5:20	196:5,6	Joe's	222:17	
18:12,18	197:8,9	179:13	223:1	joke
19:1	250:5		244:19	12:21
32:6,16	255:10	John	246:4	
55:25	307:21	10:20	258:12,16	joking
56:22		12:4,8	259:19	241:21
58:13	Jeff	14:8 31:9	260:3	
98:20	17:3 18:3	36:18	287:4,9	Jones
135:3	32:20	62:18		60:12,13
239:8		63:2,20		
281:12	Jennifer	64:21,23	Johnson's	10:12,13
283:24	172:14,17	65:7	68:19	28:18,21,
309:25		68:12,18		24 40:3
310:1	jeopardize	70:1	join	70:13,21
	227:18	78:24	220:12	71:7,8
	228:11	79:2		
issued		197:22	joined	jotted
131:11	jersey	198:2	34:1	227:12
133:24	233:22	204:7	35:18	
		219:20	36:21	journalist
issues	jerseys	220:1,4	37:8,21	179:25
26:25	210:17,18	222:17	38:6	205:24
79:12	233:22	244:19	68:22	
		246:4	69:25	JTPA
itemized	job	258:12,15	70:9	50:10
93:13	48:23	259:19	198:20	
	49:3,5,	287:4,9	218:7,15,	Juan
	12,13		19 220:3	170:23
items	50:3,8,		221:8	283:14
78:18	12,19	Johnson	225:11	
151:4	52:9,11,	10:20	226:8,13,	judge
164:11	14,16,24	12:4,8	23 227:9	9:18
166:7	55:12	13:5 14:8		14:16
187:8	63:17			15:11

GERALD BOSTOCK
BOSTOCK V. CLAYTON COUNTYOctober 14, 2021
Index: judges..last-minute

16:19	judicial	232:8	54:1 56:4	88:12
22:2,7,20	46:18	248:25	73:22,25	100:7
23:2,7,	48:2,12	249:20	75:8	134:19
12,17		253:24	98:19	
31:2	July	260:3	107:1	Kristen
34:10,23	238:23	266:2	113:12	44:13
35:12	255:10,11	309:4	120:15	
36:3	256:5		126:25	<hr/> L <hr/>
37:3,24	jumped		141:20	
38:6	237:17	K	165:6	
69:25	jumpstarted		178:8	labor
79:3	126:21	Kaiser	183:4	186:6
88:19		307:25	185:5,23	265:5
91:16	June	Kathy	186:7	272:3,12,
105:14	35:7	44:8	204:15	20 288:6
111:25	69:16		212:11	lack
119:6,9	Juniper's	Kearns	234:6	249:2
128:19,	179:14	41:10	239:20	279:25
20,21		42:13	252:20	281:16
160:12	jury	Keith	258:25	300:18
204:8	7:5	20:6	296:21	Lake
209:19	52:13,18	22:22		47:11
213:22	justice	Kendra	kinds	
214:10,	45:17	66:2	297:3	laminated
12,13,14	66:1		King	185:5
215:1		Kentucky	172:15	landed
216:10	juvenile	97:11	Kinship	300:23
220:1	10:25		155:16,	language
221:5	16:24	Key	17,22	215:14
258:18,21	19:19	50:22		
266:3,22	20:2	51:14,25	knew	lapel
267:7,14,	29:18	keys	7:17	291:14
25 268:18	30:10,15	25:1	13:18	
271:20	48:19		15:5,7	large
284:16	52:7,11	kick	31:3,10,	64:19
286:11	54:21	307:20	14,25	96:3
287:3	64:4 66:1	kidding	65:1 70:1	125:8
309:22	67:15	12:22	200:1,4	197:3
310:2	78:2,6	kids	208:17,18	274:18
	79:19,20	51:3	230:23	largest
judges	82:12,13,	97:17	231:2,8	192:7
54:24	19 87:15		260:3	274:19
79:20	88:7 92:7	kind		
91:16	100:18	23:17	knowing	lash
126:9,19	117:22	27:9 40:1	220:15	279:23
127:7	124:21	42:18	knowledge	last-minute
128:11,17	128:10	52:19	15:12	61:6

GERALD BOSTOCK
BOSTOCK V. CLAYTON COUNTYOctober 14, 2021
Index: late..living

late	176:3,4,	89:16	276:8	93:13
150:17	11,16,18,	166:11	297:8	95:1
286:10	25 177:1,	leaving	302:5	96:16
laughed	2,3,12,22	186:5	license	listed
202:1	178:3,20	247:17	47:4	68:12
	194:3,8	led	licensed	205:24
laughing	198:20,21	58:13	292:16	207:14
241:20	201:21,22	65:5 92:8	293:5,20	210:21
law	207:21	126:18	295:16	265:19
42:25	212:5	left	licenses	290:23
43:6	213:15	36:5 97:1	45:14	lists
47:11	217:23	110:22	lien	104:20
116:12	218:16,20	229:14	25:2,7,	litem
174:11	220:3	230:15	15,22	50:23,25
Lawrencevil	223:18	249:20	life	51:16
le	226:9,24	275:10	26:24	88:21
44:1	227:9	legal	87:12	125:16
	228:8	9:5 25:9	237:15	195:22
lawsuit	232:4,21,	39:2	247:10,13	litigation
5:14	25	211:5	283:23,24	15:2
46:21,23	261:10,	268:23	284:13	278:25
218:5	14,21,22	269:6,7	285:10,	live
231:19	262:3,19,	282:9	12,23	39:17,25
246:6	24 263:20	legible	lifestyle	40:22
270:3	267:18,19	95:25	29:24	44:16
291:24	270:8,10	Legnon	269:24	247:15
309:12	274:19	205:23	light	296:19
leadership	leagues	lengthy	101:7	lived
252:13	179:2	205:14	likelihood	28:20,21
leading	learn	Les	211:14	39:15
21:18	301:16	22:21	limited	40:5
league	learned	Lesley	29:11	41:13
34:1	34:17	283:3	lines	174:12
35:19	70:8	letter	13:6	191:4,7
36:21	217:22	13:25	169:24	207:24
37:9,22,	218:6,20	letting	209:1	livelihood
23,25	223:2	221:8	274:1	292:6
38:3,7,9,	226:23	level	LinkedIn	lives
10 68:23,	lease	74:1 96:2	43:11	85:7
25 69:15,	25:8	177:6	list	living
20,25	leave	223:23	68:6	28:15
70:9	36:1,3			29:24
175:10,	50:18			43:22
12,18,19,	55:12			
20,23				

GERALD BOSTOCK
BOSTOCK V. CLAYTON COUNTYOctober 14, 2021
Index: loan..make

44:3	longer	255:17,18	Luncheon	246:22
loan	24:21	272:14	146:7	247:7
299:17	40:11,13	276:7	166:5	252:25
local	47:10	284:15	179:22	255:14
189:5	101:22	287:19	lying	258:18,21
located	159:19	297:6	250:19	264:23
175:23	looked	309:1	Lynn	272:12
location	132:21,22	lots	4:5 5:2	286:20
89:17	239:16	74:13	38:19	289:8
141:22	243:21	love		293:6
172:13	255:12	62:22	<hr/>	Maguire's
locations	Los	297:1	M	153:21,25
235:25	80:2	loved		154:10
locked	lose	296:13	mad	mail-in
260:19	249:13	Lovette	241:11	72:2
logo	losing	174:12,25	made	main
204:12,	292:6	low	11:1 12:5	76:18
18,22,24,	loss	78:7	17:4,19	162:8
25 210:23	292:20,	85:6,9,17	19:13	306:17
211:23,24	21,25	Lowe's	37:15,18	maintain
212:19,21	293:2	163:22	56:4	157:24
213:7	lost	164:1	59:17	maintained
233:21,23	47:9	lower	62:18	307:3
290:17,	101:8	168:3	63:20,22	major
22,25	269:20	262:13	81:23	104:15
291:6	271:10,13	301:20	88:19	majority
long	281:15	lower-	100:12	143:20,22
23:23	lot	paying	109:7	151:17
24:5	6:4 10:24	301:6	110:2	make
39:15	12:10	lowercase	112:15	12:21
50:3,12	20:22	93:14	127:15	14:12
57:19	47:3	lunch	130:1	14:12
137:5	69:20	114:20	134:11	26:16
185:21	71:24	149:14,	140:11	31:16
186:10	104:20	15,21,24	150:14	58:15
191:8,14,	134:7	157:10	151:25	62:4,12
15 214:22	142:3,6	168:3,7,	174:17	63:10,12
259:17	154:23	10	177:16	72:1 78:5
284:20	170:6	170:22,25	181:18	82:7
292:22	172:23	171:3	208:7,16	82:7
293:20	184:15	183:5	210:25	103:5
298:19	186:19	285:21	220:16	105:13
300:21	219:15		223:6	107:14,19
	223:24		227:21	113:8
			228:4	129:21

GERALD BOSTOCK
BOSTOCK V. CLAYTON COUNTYOctober 14, 2021
Index: makes..meeting

143:13	managed	20	244:16	meaning
151:2	127:17	mark	251:24	60:21
160:22,24	management	109:9	254:10	82:14
162:15	58:23	111:12	265:2	181:11
211:11	59:1	193:7	272:1	200:18
213:2	121:5	marked	278:4,15	204:12
218:1	154:13	92:18	married	220:11
229:21	252:11,19	104:7	41:14	226:10
267:23	261:1	109:16	43:18,25	means
268:10,16	manager	115:20	44:9,14,	94:6
271:3,12	11:25	116:22	15,18	120:16
300:6	17:7 62:1	146:19	90:6	163:2
304:13	63:25	151:6	Marriott	189:16
305:7	169:7,8	167:15	51:11,13	245:12
307:3	283:15	193:15	52:1	246:2
308:6	managing	195:23	Martin	meant
makes	61:1	197:16	66:13,23	33:10
269:19	mandatory	203:10	Mastercard	61:20
305:8	36:17	217:5	306:17	69:9 81:2
making	79:24	229:23	materials	191:1,9
16:19,25	180:16	238:18	164:15	214:17
61:4	288:6	244:22	165:16,20	mechanism
154:11	manifested	252:6,11	matter	253:18
187:24	292:3	254:17	4:5 11:3	media
188:19	manner	265:7	12:17	41:4,8,21
206:24	64:1	272:6	23:1	42:13
228:10	245:19	275:14	237:19	43:15
285:25	March	278:6,21	245:23	308:24
300:24	193:11	markers	269:1	309:11,15
male	220:7	165:9	281:5	medical
97:6	223:9	Market	matters	293:13
146:7,10	234:21,24	175:23	85:22	296:7
179:21	235:4	marketing	max	297:5
213:13	Marcus	181:3	306:12	medication
males	56:13,21,	291:11	Mccormick	7:13
274:17	23 58:16,	marking	161:4	meet
Mall	17,18,20,	92:13	Mcdonough	80:10
239:15	23 59:1,	104:1	174:12	154:13
man	18 62:11	115:8	meal	155:1
226:6	287:24	146:14	90:13	163:17
230:10	292:24	167:12	156:21	220:20
233:7	300:23	195:14	157:5,14	meeting
271:10,13	307:9,17,	203:5		14:6
291:14		237:25		

GERALD BOSTOCK
BOSTOCK V. CLAYTON COUNTYOctober 14, 2021
Index: meetings..Mew

36:17,19	132:24	268:22	mentoring	144:22
37:1,4,7	168:8,12,	287:14	223:24	Mew
64:21	24 169:2	men	mentoring-	4:13 5:19
65:14,21	223:19	271:21	type	15:18
140:4,7,	274:2,4,	men's	97:16	16:12,14
25 145:8	7,9	143:4	Mercer	19:21
149:14,	members	145:25	116:12	23:25
15,21,24	23:8	146:4	merged	26:6,14,
159:8	30:10	mental	303:18	16,19,22
160:2,8,9	41:5	59:24	merger	27:4,8,11
168:7,11	43:22	289:14	303:24	31:15,21
170:23,25	44:19	301:13	Merritt	32:7,17
171:3	133:4	302:4	67:5	33:6,13
172:14	134:15	mentally	282:15	37:13
180:16	140:6	237:13	message	38:11
182:9,12	144:4	mention	209:9	55:15,17,
183:23	166:18,19	267:21	210:16	22 59:7
184:19,	168:13,22	268:14	met	68:20
20,22,23	183:8,19	295:15	9:5 20:3	85:11,19
240:20	187:3	mentioned	23:19	86:8,16
245:4	209:9	15:8	29:6	87:13
247:24	214:8	45:12	44:10,16	89:5
248:4,10,	232:5	48:3	54:22	90:15
22 276:6	241:15,21	62:16	60:22	92:1
282:22,23	242:2	79:7	134:14	93:18
287:2,13,	246:5	94:17	166:5	98:14
15,20	253:1	95:13	180:22	100:2,8
295:16	255:21	98:10	192:2	101:13,24
meetings	memo	115:24	293:22	102:9,17,
60:17,18	110:20	144:13	Metro	24
61:6,9	198:17	174:24	44:20	103:11,
91:15	238:22	176:17	76:25	14,17
140:12,16	240:18	179:7	77:18	105:20
158:18	244:18	199:20	145:2,11	106:14
172:11	245:8	201:19	162:4,6	107:21
180:21	Memorandum	205:25	188:16,	108:9
187:5	90:22	206:2	20,24	109:2
243:12	115:10	207:11,15	189:1,6,	110:16
250:21	116:8	220:12	11 190:5	113:24
282:19	memory	221:1	290:20,21	114:4,21
member	7:14,23	241:25	Metro-	117:25
11:21	110:18	251:7	collaborati	118:5
17:2 41:2	114:6	259:12	ve	119:4
75:11	135:18	283:9		120:5,19
95:4	136:5			121:14,21
114:12				122:9,17

GERALD BOSTOCK
BOSTOCK V. CLAYTON COUNTYOctober 14, 2021
Index: Michael..Mm-hmm

123:1,22	221:23	Michael	164:3	misusing
125:2,22	223:4	4:10 5:13	188:4	36:22
126:5,16	224:8	16:14	192:18	Misérables
127:3,23	225:1,20	26:14	245:9	22:21
129:17,23	226:15	41:10	279:19	mix
130:8,23	229:9	55:15	mine	85:20
131:21	230:4	147:12	41:13	mix-up
132:7	231:5,16,	148:1	193:24	31:24
133:10	23	188:1	minor	Mm-hmm
134:4,25	232:11,19	233:3	175:18	21:8
136:4	233:1,3,	middle	minute	32:22
137:3,13,	5,9,11	104:22	55:20	51:1,23
24 138:9,	237:1,10	168:1	164:13	52:21
19 139:2,	245:13	179:14	minutes	61:3
9,17,23	246:8	205:7	245:3	65:23
146:18	248:5,8	230:15	247:24	66:4
147:12,	249:18	248:18	302:14,15	67:23
14,20,25	251:20	Midtown	misappropri	77:9
148:6,11,	253:16	28:15,20	ated	78:10
15,18,20,	254:6	34:2	308:25	83:24
23,25	255:16,25	35:19	miscellaneo	95:6
153:16	261:6,16	36:23	us	100:14,22
156:25	262:4,25	70:14,21	142:2	101:2
157:2,16	263:10,21	174:14	missing	106:24
160:22,24	264:4	210:1	147:14,17	109:15
165:13,23	267:10	219:1	mission	110:25
173:25	268:3,21	267:20	72:19	135:10,21
185:13,19	269:21	270:11	104:19,24	136:16
186:8,17	270:6,16	283:16	106:3,21	149:11
187:6,16	271:4,14,	295:20	Misstates	155:4
188:1,3,7	22 273:8,	midway	263:10	159:14
189:18	15 276:3	192:1	mistaken	161:20
190:2,18	277:13,	Mike	290:20	163:14
191:17	16,20	278:8	mistakes	164:17
192:16,23	279:6,21	mileage	272:15,22	166:13
194:10	280:9,17,	77:16,20,	misundersto	168:9
196:13	25 281:6,	22 78:5	od	169:6
203:23	8 283:20	miles	255:22	173:11
205:17	284:6,21,	43:23	misuse	178:23
209:24	23	military	112:6	181:15
211:8,11,	286:12,20	45:24	mind	182:19
13 213:25	294:24	mind	41:9,18	184:3,10
215:5	308:13,17			186:23
216:6,9,	309:6,17,			190:10,25
13,16	21,24			191:5
217:24	310:5,11			
218:8,22				

GERALD BOSTOCK
BOSTOCK V. CLAYTON COUNTYOctober 14, 2021
Index: model..must've

199:6	67:10	185:25	monthly	MOU
205:22	77:10	186:1,2,	152:6	108:18
215:11	78:1	5,16,19,	298:24	109:5,6
219:10	88:16	20 187:4	300:6,8	110:20,23
220:14	91:1	189:5,23	months	113:18
221:17	97:1,18	196:19	11:6 24:3	115:12,17
233:4	98:5,10,	197:4,9	39:23	116:15
235:11	11 99:14,	213:8	68:24	117:4,15
241:24	24 100:6	215:19	146:16,22	118:4
242:13	101:8,23	224:2	149:6	123:20
243:2	102:3,8,	240:6	193:11	124:4,8,
247:20	15,22	272:25	218:17	12,16,17
248:1	103:6	273:3	224:23	125:14
260:18	107:6	274:14	225:8	126:13
262:10,18	110:10,	275:1	266:4,20	127:11,20
268:25	15,19	276:17	288:1	136:15
269:3	111:4,10,	289:17	292:11,24	150:13
283:7	20,22	291:8,18	301:1	165:25
	112:6,7	300:19		186:11
model	113:8	monies	Moore	189:14,20
179:22	118:9,21	67:3,13	283:3	190:1
213:13	119:2	89:21,22	morning	191:14
models	125:4,6	96:24	5:11,12	213:2,5,
146:8	126:25	107:25	35:5	23 214:2,
moment	127:6,12,	108:6,8,	242:9	5
14:10,15	25 128:4,	14,20	Morrow	move
16:21	7,12,14	109:5	17:8 92:9	81:21
32:23	129:14,25	114:10	169:8	238:2,14
34:8 68:9	130:6,12	129:12	239:13,14	248:24
86:20	135:15,24	136:17	240:1	moved
90:10	136:7	237:3	mortgage	49:9
103:12	137:2,21	250:2	292:12	50:8,22
135:13	138:7	monitoring	298:22,24	141:22
242:6	142:1,9,	51:3 66:5	299:7,12	moving
Monday	23	month	300:5	63:13,15
35:4,7	143:18,	140:2	mother	251:15
200:23	24,25	146:18	235:6	multidiscip
241:2,10	145:13,	148:15	296:16,	linary
242:9	14,18,22	150:16	17,22	60:23
money	150:21,25	264:14	307:5,7	multiple
34:2	151:2	290:1,3	Mother's	65:22
35:19	152:11	294:9	235:7	142:22
36:22	166:23	296:5	Motor	must've
52:12	170:14	305:13	166:17	10:6,10
66:12	173:16			
	178:9			
	184:2			

GERALD BOSTOCK
BOSTOCK V. CLAYTON COUNTYOctober 14, 2021
Index: mustache..oath

50:20	142:4, 5	179:9,10	noted	195:17, 23
mustache	156:3	newly	292:18	197:16
230:3	159:23	290:7	notes	198:18
mutual	248:19, 22	Newman	194:20	201:13
145:18	287:18	253:23	notice	203:10
	needing		5:7 87:3,	204:11
	151:4	news	10,12	205:4
N	159:7	36:25	150:15	207:12
	negative	209:7,18	195:15	214:20
N-U-P-R-I-D	253:13	210:10	219:8	217:5,10
116:10	negativity	308:24	noticeably	238:18
named	57:12	nickname	37:5	244:22
53:10	58:1	57:7, 8, 16	noticing	245:22
names	neglect	58:8	88:1	246:21
11:14	82:15	night	141:24	247:4
38:22, 23	84:5	71:3, 16,	November	248:18
230:8	85:12, 24	21 80:10	117:16	252:6
narrowed	223:20	257:6	147:16	254:17, 24
33:7	neighbor's	nodding	150:17	255:8, 9
Nashville	42:3	6:13	244:19	265:7, 22
238:6, 11	neighbors	noise	245:4	272:6
national	41:12, 13	8:14	298:21	274:18
80:3	Neiman	non-profit	NR	275:14
82:1, 2	56:13, 21,	91:18	162:25	278:6, 21
144:4, 6	23 58:16,	100:11	163:2	288:14
155:12,	17, 18, 20,	155:7, 14,	nude	292:7
13, 22	23 59:1,	18 272:25	256:19	301:16
158:7, 9	18 62:10	273:3	258:3	numbers
185:6	287:23	nonemployee	260:12, 21	21:11
230:24	292:23	74:22	nuh-uh	64:8
290:1	300:23	normal	6:10	95:24
necessarily	307:9, 17,	159:11	number	146:22
79:16	20	Northeast	5:6 65:7,	168:25
85:22	Ness	50:9	12 76:13	171:11
90:16	205:24	306:4	92:18	Nuprid
94:22	net	Northern	104:7	116:10
225:18	214:22	5:5	109:16	nursing
254:4	netbook	note	115:20	60:24
needed	179:8	167:2	146:19	
67:20	netbooks	194:13, 16	147:17	O
75:19	151:23	253:10	162:7	
77:5	152:1	307:4	167:15	oath
136:24			193:15	6:5, 25
				7:4

GERALD BOSTOCK
BOSTOCK V. CLAYTON COUNTY

October 14, 2021
Index: object..ongoing

79:15,16	136:4	276:3	observing	34:15
115:5	137:3,13,	279:21	141:24	72:5,8,
object	24 138:9,	280:9,17	occasion	15,18
15:18	19 139:2,	281:6,8	10:15	73:13
16:12,14	9 153:16	283:20	occasionall	81:24
19:21	156:25	294:24	y	82:6
23:25	157:16	objected	42:2	140:23
26:6 32:7	165:13,23	88:16	140:19	142:16,18
33:6	173:25	objection	214:19	169:7
37:13	185:13,19	26:17	229:18	202:20
38:11	186:8	32:17	250:24	248:25
68:20	187:6,16	85:19	occasions	257:6,9
85:11	189:18	86:16	157:4	296:5
86:8	190:18	100:8	occur	officer
87:13	191:17	101:24	34:25	41:15
88:11	192:16	102:17	202:7	officers
89:5	196:13	114:4	235:2	109:7
90:15	203:23	121:21	occurred	offices
92:1	205:17	123:1,22	7:23 35:3	169:9
93:18	209:24	126:5	65:24	199:8
98:14	213:25	127:3	143:1	251:1
100:2	215:5	139:17,23	196:16	official
101:13	217:24	186:17	199:7	276:25
102:9,24	221:23	190:2	225:24	oftentimes
105:20	223:4	218:8,22	235:25	60:19
106:14	224:8	232:19	267:4	96:25
107:21	225:1,20	233:1	291:3	Olde
108:9	226:15	262:25	October	239:14
109:2	231:5,16,	264:4	4:3	oldest
110:16	23 232:11	268:21	106:22	44:9
113:24	237:1,10	271:22	odd	Olive
117:25	245:13	273:15	210:2	168:10
118:5	246:8	280:25	257:10	169:10
119:4	249:18	objections	offer	oncologist
120:5,19	251:20	5:16	52:12	292:18
121:14	253:16	objective	302:1	294:7
122:9,17	254:6	210:9	offered	one-way
125:2,22	255:16,25	226:22	301:23	186:4
126:16	261:6,16	obligation	offers	ongoing
127:23	262:4	7:2	308:3	93:2
129:17,23	263:10	observe	office	104:25
130:8,23	267:10	222:6	15:9	
131:21	268:3	observer		
132:7	269:21	226:22		
133:10	270:6,16			
134:4,25	271:4,14			
	273:8			

GERALD BOSTOCK
BOSTOCK V. CLAYTON COUNTYOctober 14, 2021
Index: open..paperwork

open	269:13	57:22	outlines	
30:20		61:18	122:18	p
51:18	order	65:2,19		
227:17	25:21	208:21	over-	
	81:18	209:23	exaggeratio	p.m.
open-ended	106:16	210:11	n	310:15
310:1	146:24	224:16	255:19	packet
	159:22	225:5,25	overdrawn	109:22
openly		226:13,23	303:14	pages
269:24	ordered	232:4	overexagger	147:2
270:4,5,	135:6	261:19	ating	159:1
13	organizatio	263:16	279:18	161:16
opinion	n	264:9,12,	overheard	164:21
103:1	82:2,7	24 265:18	266:4,19,	179:5
249:16	105:2	267:22,25	21	182:7
276:5	141:17	268:11,	overlapping	184:14
	143:10	14,17	187:23	187:21
opportuniti	144:6,14	270:19	overly	193:19
es	145:2,3	281:12	18:15	196:2
81:22	152:22,25	283:23	overnight	245:1
82:4,6	155:7,14,	284:13	173:12	252:9
95:10	18 180:24	297:18	oversaw	paid
288:17	273:24	309:14	59:24	110:8
opportunity	288:11,19	original	oversight	119:16
14:18	289:5,9	111:1	64:6	125:19,20
50:8	organizatio	116:25	66:9,17	150:8
126:20	nal	Orthopaedic	102:7	153:5,13
139:1	73:13	169:8	108:6	168:19
140:8	76:7	out-of-	109:1	178:18
172:23	organizatio	pocket	111:7,8	300:4,11
223:18	ns	178:13	128:16	painted
237:16	144:7	outcome	overwhelmin	204:19
242:10	239:19	46:25	g	painting
274:17	orientation	232:15,22	162:14	97:23
301:16	9:12,19	outfield	owned	Panel
opposed	10:4,21	212:8	24:25	53:9
6:9 137:1	12:6	outing	25:12	72:24
169:14	13:7,10,	23:12	28:18	73:4,20
195:20	14 14:9,	outings	owner	141:23
259:25	14 16:20,	284:18	163:17	142:4
opted	25 30:7	outlined		paperwork
168:24	36:20	106:22		25:10,22
option	41:24			101:16
166:9	42:8,16			304:12,
options	43:2			
124:18	56:23,24			

GERALD BOSTOCK
BOSTOCK V. CLAYTON COUNTYOctober 14, 2021
Index: paragraph..perception

14,20	162:4	46:17	236:19	93:16
paragraph	172:18	89:9 96:8	299:3	102:15
104:23	179:16	118:3	300:7	123:19
109:24	206:17	pass	307:18,23	151:8
119:14,15	210:15	286:23	308:7	170:14
205:7	220:7	passed	paycheck	172:20
243:20	225:22	294:9	307:17	173:14
272:10	229:3,10	passing	paygrade	176:24
275:24	255:19	198:25	301:21	177:9
parameters	267:11		302:5	182:12,
26:23	279:11	past		13,16
parent	part-time	56:7	paying	183:17,18
181:5	51:15	221:18	156:21	188:25
297:11	participant	222:15	185:11	189:16
parents	s	path	187:13,14	192:5
22:21	123:10	186:4	payment	206:6
118:23	participate	patient	151:21	210:2
119:21	141:25	172:16	152:6	212:2,14
120:3	244:1,3,	226:5	155:7,21,	213:6
124:10	5,11	292:8	25 162:1	223:19
125:6,15	281:23	patients	292:12,13	227:3,7
126:25	participate	301:17	298:25	228:6
127:6	d	Patrick	299:6,12	230:13
181:11,	183:8	230:9	300:3,6	231:10
17,24	217:18	Paul	payments	237:20
park	224:6	26:9	99:20	241:10
194:1	238:6	pay	Peachtree	253:23
235:12,13	281:25	54:2,25	4:6	256:19
236:6	participati	88:5,11,	people's	288:25
parking	ng	16 89:18	pending	58:14
287:19	188:22	98:24,25	5:4	85:7
part	189:12	119:21	pension	percent
30:22	223:17	120:3	304:4,11	71:17
44:23	267:17	125:16	306:2	140:14
62:19	partner	127:1	people	176:12
76:25	8:5 10:18	132:16	10:17	252:21
104:15	20:17	133:2	30:9	283:1
105:5	51:9	134:2	32:6,16	percentage
109:12	299:5,11	135:8	52:16	87:17
112:8	partners	157:4	66:23	125:8
118:13	20:3	166:12	74:13,21	305:11
126:12,24	party	178:12	76:18	perception
145:15	17:11	185:18	79:14	232:9
159:19			80:25	
			87:10	

GERALD BOSTOCK
BOSTOCK V. CLAYTON COUNTYOctober 14, 2021
Index: perfect..point

perfect 284:3	permit 89:3	personnel 259:25	264:21	177:23
perfectly 284:3	permitted 134:23	pertains 252:23	Piedmont 182:21	178:2, 3, 6 216:13, 17 234:15
perform 246:16	person 52:17 61:13 67:16 102:21 116:15 124:18 137:10 138:6, 14, 17 139:7, 20 158:8, 12, 13 179:20 191:8 210:9 215:25 250:15 256:21 262:14 266:9, 19, 21 269:19	petty 141:20 142:7, 12, 15 ph 204:2 philosophy 110:14 phone 287:17, 20 photographs 256:19 257:8, 24 258:2 260:13, 21 photos 170:6 physical 292:9 physically 32:12 237:13 295:10 pick 112:21, 22 151:17 pickup 201:5, 8 picnic 276:22 picture 211:15 228:24 pictures 259:18 pieces	291:13 pink 287:16 pins 291:18 place 7:22 40:5 67:13 101:21 117:15 124:12 139:25 160:6 164:7 210:22 250:20 285:18 placing 67:3 Plaintiff 4:14 plan 269:1 305:5 308:1 planning 157:19 291:2 plans 308:2 plate 47:4 plausible 226:4 play 176:13, 21, 24	235:9 237:7 257:11, 22 played 83:10 104:15 175:7, 21, 23, 24 176:8 179:2 207:20, 22 210:11 217:10 229:4, 19 230:14 234:11, 14 235:5, 12 238:3, 4 239:22 player 229:19 players 110:4 176:21 234:6 playing 176:2 177:13, 17, 19 178:24 216:19 237:7, 23 plays 234:25 pocket 134:7 178:19 point 9:21, 22 10:6, 8, 23
period 24:10 52:10 60:9 66:19 70:12 71:2, 21 81:5 108:2 140:22, 24 227:17 252:22 264:20 286:5 294:22 296:2 300:19 308:7	personal 26:24 27:14 139:8 166:14 219:15 237:3, 4, 8 247:10, 13 259:25 260:4, 16 284:13, 17 personality 219:15 222:8 personally 34:11 85:21 206:19 240:15	periodic 80:17 periods 71:7 Permanent 307:25 permission 290:25		

GERALD BOSTOCK
BOSTOCK V. CLAYTON COUNTY

October 14, 2021
Index: police..primary

26:11	67:11	289:7	235:19, 24	182:1, 16
27:19	portion	possibly	preceding	202:25
53:12	64:19	90:7	149:13	220:22
55:18	portions	155:22	predominant	240:14
56:19	111:13	164:4	ly	241:14, 16
57:5	147:1	183:12	87:22	282:24
63:24	posed	200:12	176:21	presented
85:6	203:8	220:7	prefer	114:9
88:19	position	234:1	192:3	127:15
101:22	11:24	235:1	preference	140:3
112:11	49:3, 7, 17	284:18	271:20	141:14
134:14	51:18	post-	preferred	198:4
136:6	52:6, 8, 13	secondary	302:10	264:15, 25
138:5	59:21	45:9	prejudice	pretty
141:4	64:19	poster	286:18	13:24
208:6	74:10	165:9	prejudicial	70:3
236:6	75:11, 16	184:25	284:23	122:10
237:7	76:10, 11,	potential	284:23	205:14
240:24	12 93:10	76:22	premium	236:16
243:10, 25	143:22	121:9, 10	308:7	242:14
249:13	145:10	153:2	premiums	249:15
256:17	199:18	155:1	307:24	299:8
282:14	232:17	172:12	308:5	306:21
287:15	249:10	198:21	prep	307:12
301:5	250:1, 3	231:14	184:22	previous
303:18	251:11, 15	potentially	Preparation	18:20
306:11	257:18	188:25	184:20	66:25
police	266:4, 11	poverty	9:3	164:10
40:16, 24	267:14, 15	86:3	prepare	195:1, 16
41:2, 5, 15	268:1, 19	powerful	9:3	199:20
42:14	279:24	170:21	preparing	previously
48:6	281:15	practically	8:9	19:8
policy	287:24	169:10	presence	price
133:11	288:3	174:21	92:6	141:17
polo	301:1, 6,	practice	present	primarily
290:7, 9,	12 306:12	83:12	4:8 25:4	64:18
12 291:8	positions	119:24	36:25	76:20
pool	288:8	159:12	60:18	96:24
162:14	positive	236:4, 5,	90:7	97:5, 13
poor	113:22	13	111:15	151:17
120:3	possession	practices	128:10	204:15
283:9	287:17	180:23	171:4	primary
poorly	possibility			28:24
66:3, 8, 16				100:10

GERALD BOSTOCK
BOSTOCK V. CLAYTON COUNTYOctober 14, 2021
Index: print..psychiatrist's

123:23	proceeding	81:18	progress	169:2,16
191:21	46:18	92:7	91:11	prostate
print	48:12	93:3,4,8,	project	224:13,
187:23	83:20	15 97:9,	141:13,15	18,20,22
printed	proceedings	10,14,17	277:3	225:5,9,
110:6	48:2	105:1,3,	projects	12,17,18,
prior	process	10,18,22	18:4	22 298:6
7:1 55:8	67:25	106:8,12	97:17	protect
69:3	76:22	116:5	171:10	30:24
83:15	77:5	117:23	223:25	prove
95:22	110:22	120:22	Promise	237:12
100:15	121:7,8	123:15	66:6	provide
107:25	122:19	145:5	promote	44:4 93:2
108:4	173:13	155:5	242:3	95:8 97:2
170:23	191:24	156:19	promoted	104:25
202:11	207:10	163:8,21	54:4	105:10
219:11	251:5	169:25	promoting	106:16
257:7	301:19,21	175:2	261:22	111:8
262:11	processing	181:12,13	267:18	139:1
281:24	163:9	186:13,	270:9	242:24
privilege	196:18	21,25	promotion	292:12
5:20	produce	189:6,12	53:19	provided
privy	217:1,2	190:17,20	54:7	72:23
15:6	produced	191:15,16	promotions	82:2
282:8	8:25	204:1	54:14	203:20
problem	216:21	214:19	proper	204:6
18:12	272:2	237:20	67:7	239:21
19:9	275:4	249:9	255:1	278:19
31:21	production	261:22	property	290:21
32:6,16	278:20	267:18	14:1	providing
42:18	productions	270:9	36:1,3	111:7
161:4	8:13,19,	276:7	51:14	124:13
problems	24	309:3	89:10	155:19
66:25	program	programs	247:17	psychiatric
procedure	50:23	33:10	256:8	49:17
5:9 120:2	51:16	72:21	287:18	psychiatris
proceed	53:2,8	73:3,8	prospect	t
192:20	64:3,10	81:25	191:1	293:7,9,
proceeded	66:13	116:6	192:18	14 301:11
14:21	72:16	143:15,25	prospective	psychiatris
231:15	73:19	144:9,16	168:8	t's
	79:25	158:19		293:11
	80:2	159:8		
		180:15		
		189:1,5		
		192:8		

GERALD BOSTOCK
BOSTOCK V. CLAYTON COUNTYOctober 14, 2021
Index: psychiatrists..raises

psychiatris	78:11	270:21	101:19	quietly
ts	88:24	291:14	112:23	29:24
59:22	92:25	305:13,16	113:12	quirky
psychology	104:19,	puts	115:15	12:24
301:13,22	21,24	176:19	123:3	
302:2	105:9	305:14	140:20	
	106:2,7,		160:25	
public	21 120:10	putting	171:18	R
93:3,14	141:12	89:19	177:9	race
94:3	143:14	117:9	201:13	20:24
97:25	157:5,6	186:2	205:4,8	21:9,13,
105:2	185:25	264:21	222:18	21
106:12	189:24	puzzle	226:17	182:21,24
170:8	purposefull	264:21	265:22	183:1
176:19	Y		268:5,6	racecourse
227:21	128:12	Q	283:22	21:10
228:4,10	purposely		284:3	164:10
291:16	280:1	quacker	285:11,14	raced
Publix	purposes	21:2	286:1,3	21:10
188:14	5:8 102:4	Quackers	295:4	
Puerto	128:15	95:13	297:7	racially
89:12	130:6,12	qualified	questioned	57:16
pulled	136:22	288:9	88:23	radiation
42:18,20	147:15	quarter	questioning	298:11
89:17	188:21	152:22	110:18	rainbow
pulling	189:20	Quarterback	questions	9:15
96:12	194:10	s	6:5 7:1,	210:2,5
purchase	217:8	97:12	10,17	raise
89:3	230:5	quarterly	117:5	93:4
136:24	pursue	54:22	198:17	94:13
151:4	288:16	question	203:8	97:18
152:1	put	5:17	264:15	105:3,23
162:12	15:21	6:17,22	308:12	106:9,12
201:4,8,	83:14	10:20	310:7	raised
11	95:17	18:21	quick	96:24
291:10,	129:12	27:16	59:8	98:5,10,
19,21	146:23	31:5,17,	205:3	11 99:14
purchased	166:9,14,	23 32:9	309:10	145:13
162:15,18	20 170:10	33:8 54:6	quicker	146:1
purchases	171:14	74:9	80:9	240:6,10
150:14	185:10	81:12	quickly	310:1
purpose	199:23	86:24	298:2	raises
72:19	233:11	87:1	quiet	94:9
	259:21		219:1	102:3,8,

GERALD BOSTOCK
BOSTOCK V. CLAYTON COUNTY

October 14, 2021
Index: raising..received

16 185:24	275:20	263:19	58:24	221:7,14
raising	282:7	265:24,25	62:18,24	227:3,24
30:23	reading	267:21,22	63:7	228:9
96:14	15:6	268:8,9,	64:18	229:15
101:4	105:5,15	13,14	68:9	234:13
186:16	112:8	271:19	70:22,25	236:4,5,
ran	149:15	277:5	71:24	9,10
235:1	169:25	279:14	80:15,19	238:8
range	201:13	291:21	87:25	239:4
150:15	213:23	297:15	89:11	240:9,19,
195:10	ready	303:19	90:8,9	22 241:13
rapport	89:16	reasonable	98:3	242:5
83:12	real	55:17	101:14	243:23
Raquel	97:22	127:8	108:25	248:10
204:1	205:3	210:13	109:3	249:3
rarely	309:10	231:12	112:4	250:11
88:13	realization	254:8	116:22	251:12,16
rate	198:24	289:3	117:2,5	252:16
125:21	realize	reasoning	119:10	253:2
rating	301:20	153:10	127:4,25	255:3,4
252:21	reask	255:22	131:17,25	256:7,20,
RE-CROSS	226:16	recall	132:3	21 257:11
309:8	reason	11:20	135:1,13,	258:5,7,
reach	7:8 36:11	13:8,25	14 152:14	23 259:4,
227:6	42:7 65:6	14:7,10,	153:8,9	19 260:10
reached	70:4	15 16:21	154:11	274:15
199:23	100:10	17:18,24	155:15,24	275:6
reaction	142:24	19:10,15	156:2,6	277:8
223:17	149:4	20:12	163:24	282:3,18,
read	150:10,25	23:9,11,	167:5,8	22 283:13
27:16	153:4	13,21	172:9,20	287:21
105:21	167:20	24:5	181:25	288:12
106:3	169:13	27:25	185:6	295:18
109:25	191:3	30:10,12,	187:17,18	298:3
187:24	192:19	22,25	195:12	303:11,19
198:18	193:12	34:8	197:24	305:23
214:3	197:8	35:2,23,	198:4,10	306:21
247:5	207:13	24 37:5	199:15	308:1,21,
266:15	209:4	38:2,12	200:22	22
268:6	221:20	41:19	201:2	receipts
272:10	223:3	43:3	202:1,5,	163:2,6
	237:12	47:14	8,23	receive
	261:2,13,	50:6 51:6	203:1	96:3
	15 262:23	53:5 56:3	208:11	received
		57:19	215:6,16,	45:6
			18,24	
			220:4,5	

GERALD BOSTOCK
BOSTOCK V. CLAYTON COUNTYOctober 14, 2021
Index: receiving..referring

52:11	record	23	recruitment	reduced
119:18	4:9 6:14	295:10,12	21:16	141:17
162:13	9:7 31:19	296:2	90:21	294:9
166:16	59:10,13	recreational	105:23	refer
182:3	84:2	l	106:18	50:24
197:21	103:11,	36:21	120:11	73:22
198:3,16	19,22	223:18	121:2,7,	reference
219:8	107:14	224:6	15,19	14:21
240:18	114:22,24	261:9,21	124:24	146:10
253:18	115:2	262:17	125:7,11	204:11
282:1	147:15	267:17	128:15	252:15
290:12,13	161:1	recruit	136:17	referenced
receiving	192:25	76:18	137:6,11	13:9
197:24	193:3	93:4	138:1	36:20
recently	194:11	105:3	153:24	91:7
299:18	217:11	154:10	154:6	116:18
reception	218:15	157:6,14	157:21	205:21
89:9	224:21	163:20	158:17,23	206:5
180:11	229:21	168:11	159:22	243:1
276:22	230:5	172:24	160:16	references
recited	233:10,	173:7	164:2	121:15
224:17	11,14,17	173:7	170:7	143:4
recognition	277:23	183:21	171:23	referencing
21:3 93:5	278:1	190:16	172:19	182:17
105:4,24	293:13	192:5,11	173:19	209:25
290:5	302:15,	198:20	179:17	272:15
recollection	20,23	205:8	180:20	referred
86:18	310:14	223:21	182:5	34:9
117:1	record-keeping	237:19	183:15	35:15
127:14	130:12	274:17	185:15	53:8
158:15	records	recruiter	186:11	59:20
179:16	141:1	76:10	188:23	96:18
214:16	295:18	256:23	189:15,21	115:12
248:2	recovered	257:14,15	190:23	176:3
recommendat	296:2	recruiting	191:21	197:21
ion	298:2	76:21	192:9	201:18
67:21	recovering	120:16,17	213:5,6,	204:15
292:17	292:7	154:7,8	19,24	293:7
293:6	recovery	160:1	214:14,22	referring
recommendat	225:10,	169:17	221:11	11:5
ions	14,23	173:5	224:3	15:15
105:13	237:14	188:25	273:10	24:24
	294:2,11,	189:24	276:14	25:6
		201:22	redirect	33:22
		219:2	309:18	
		241:22		

GERALD BOSTOCK
BOSTOCK V. CLAYTON COUNTYOctober 14, 2021
Index: refers..repeated

34:4	regular	relates	relevant	240:21
60:16	72:25	26:24	284:2,3	241:12
93:9	88:20	87:15	286:19	250:8
111:19	95:17	188:23		253:4
173:18	124:19	190:3	relief	256:4
228:1,13	145:8	222:20	300:23	258:20
229:22	300:6	283:6	relocate	293:12
256:5			288:15	295:21
260:6	regulations	relationshi	relocated	297:12
266:9	288:5	p	49:16	remove
	reimburse	20:24		260:16
refers	90:23,25	24:5,8	Remain	
123:23	166:2	25:19	247:6	removed
		26:12,22		25:1 84:6
refi	reimbursed	27:19	remained	111:3
299:18	134:8	28:1,8,16	48:24	118:6
	166:23	40:17	remaining	129:4
reflect		71:6	299:17	219:17
272:11,19	reimburseme	130:16,22		
	nt	141:15	remark	renewed
reflected	77:5,8,	153:12	12:9	251:13
148:8	10,12,14,	169:18		
149:6	21 90:12,	173:16,19	remarks	rent
reflection	20	174:7,15,	16:19,25	298:16
248:3		16,22	33:3	
	reimburseme	181:13	remember	rented
refused	nts	283:19	10:23	39:19
24:25	89:2	285:20	13:16	renting
25:1	111:6		22:23	25:16
	114:13	relationshi	23:15,16	40:4
regain	129:5	p-building	24:9	
26:4	134:10	121:7,8	47:21	reorganizat
regard			57:4 90:5	ion
61:21	relate	relationshi	114:7,18	53:6
	159:25	ps	127:7	72:10
region	160:15	182:5	136:14	reorganized
54:22	180:19	relative	140:19	53:18
	183:14	84:9	161:25	
Regional		96:25	169:1	rep
50:9	related	151:4	170:4	50:17
56:18	61:17	152:15	171:8	repeat
59:19	90:21	155:19	199:7	6:19 8:16
62:11	92:7		202:18	32:8
301:4	137:6,11	relatives	203:4	164:23
306:4	157:21	155:20	214:25	217:25
	164:1,4,7	released	215:25	268:5
registratio	179:24	67:14	230:8,10,	repeated
n	244:8		12 239:7	35:15
178:17	294:10			
234:3				

GERALD BOSTOCK
BOSTOCK V. CLAYTON COUNTYOctober 14, 2021
Index: repeatedly..retention

repeatedly	6:13	required	59:2	restaurant
16:6	27:18	88:4	115:14	154:1,14
33:24	103:15	107:10	162:14	156:12
35:15	217:3	123:25	199:10	163:19
	244:14	133:4	201:7	172:4
rephrase	268:8	requirement	203:20	236:14
6:19	278:9	133:12	205:13,	restaurants
replace	represent	research	14,16	156:10
199:19	5:14 97:8	116:6	207:11,16	209:25
267:8	109:10,12	117:6	208:16	219:2
replaced	146:15	reserve	221:15	result
164:12	167:18	5:16	222:18	60:8
224:18	representat	reside	227:13	67:19
270:5	ion	163:18	228:18	85:24
271:11	269:6,8	residence	266:2	96:13
replaces	representat	10:12,13	281:1	175:1,4
269:17	ive	28:24	responses	198:11
replied	54:23	281:24	203:7	205:9
11:2	95:7	resident	222:9	218:24
report	172:17	190:11	265:10	223:2
11:22	213:14	residential	responsibil	256:7
12:1	represented	150:5	ities	259:10
64:1,7	291:5	resides	54:16	295:12
75:4,19	302:9	296:20	249:11	304:11
78:20	reputation	resolved	responsibil	resulted
79:2	309:2	199:17	ity	60:9 72:9
83:14,15,	request	Resort	54:1	291:25
22 90:12	77:12,20	163:11,17	75:25	resulting
258:10	90:20	respond	122:3,14	303:2
259:7	138:7	14:2	129:6	results
282:7	242:16	62:21	137:16	66:2,24
reported	251:15,	227:14	responsible	172:24
11:20	16,18	281:2	61:1	215:3
17:1	254:25	304:20	67:16	retain
64:11	requested	responded	204:16	150:19,21
75:5,12	67:8	12:15,16	responsiven	151:5
76:14	204:3	191:20	ess	181:22
78:24	301:5	208:24	5:18	241:22
79:10	requester	response	rest	retaining
256:10,18	139:14	17:22	193:25	160:1
257:7	requesting	18:20	194:6	189:24
258:7,9	90:12	restate	retention	21:16
reporter		101:19		
4:18,20		115:15		

GERALD BOSTOCK
BOSTOCK V. CLAYTON COUNTY

October 14, 2021
Index: retirement..save

90:22	returning	308:20	row	Safeco
106:18	71:25	Rico	229:12	50:15,16
120:12	revealed	89:12	rubber	safely
121:16,20	29:23	rid	21:10	159:24
124:25	66:2	261:2,15	96:3	sake
125:7,11	192:19	262:23	rule	302:7
128:15	review	266:5,22	6:3	salary
136:18	8:9,12,21	267:7	rules	301:25
137:7,12	53:9	risk	5:9,10	sale
138:2	72:24	67:4	run	281:23
150:11	73:5,20	road	9:14	sales
153:24	140:4,8,	39:22	188:17,	110:5
154:6	9,17	286:13,15	20,22,24	141:5,12
156:18,20	141:23	rodeo	276:17	143:1
157:5,23	142:4	284:7	running	243:5
158:17,23	248:5	role	61:25	San
159:23	253:14,20	75:25	78:7	170:23
160:16	259:13	83:17	97:24	Sanchez
164:2	262:7	122:3,13	204:17	283:14,19
170:7	266:6	123:24	runway	Sandra
171:23	278:18	139:14	146:8	17:7
179:17	reviewed	210:11	rush	Santiago
180:20	140:6	rolled	80:8	257:13
183:15	reviewing	242:9	165:16,20	258:7,15
186:12	114:14	romantic		259:7
189:16,21	reviews	26:12,20,	S	
192:9	72:24	25		
213:20,24	226:8	283:19,24	Sabrina	Sap
214:15,23	251:22	284:19	33:23	44:10
221:11	253:22	285:12,20	34:10	sat
224:3	261:9	room	65:15	17:2
273:10	262:6,11,	296:25	111:2	Saturday
276:14	15,16	302:16	112:1	21:23
retirement	reward	rough	115:25	196:17,21
305:4,5	151:5	85:3	116:19	235:21
retrieve	ribbon	roughly	131:25	241:9
25:4	183:10,13	28:12	132:10	242:14,
287:19	ribbon-	195:3	134:14	21,25
return	cutting	250:10	274:6,8	Saturday's
25:1 71:8	183:20	routine	276:18	241:3
110:3	Richard	257:2	Sabrina's	save
303:20	36:24	row	129:2	126:25
returned	209:20	rubber		
207:9		rule		
275:1,5,8		rules		
		run		
		running		
		San		
		Sanchez		
		Sandra		
		Santiago		
		Sap		
		sat		
		Saturday		
		Saturday's		
		save		

GERALD BOSTOCK
BOSTOCK V. CLAYTON COUNTY

October 14, 2021
Index: savings..sexual

127:6	27:15	40:7,10	196:17,21	89:13
savings	115:15	141:16,18	197:2	293:14,16
303:17,20	205:6	selling	235:2	sessions
305:4	234:19	141:21	sequential	82:1
306:1	screen	240:11	146:23	256:25
Savvi	76:21	send	Series	293:23
17:8	screened	209:11	235:2	set
scale	79:24	227:10	serve	26:23
101:1	105:10	sense	123:15	91:4
schedule	106:16	12:24	126:15	101:21
73:1	search	129:21	served	124:15
257:1	288:7	267:23	18:7 64:9	130:2
scheduled	season	268:11,16	89:9	164:14
80:7	178:6	269:19	119:3	241:1,19
276:6	234:14,20	271:3,12	125:16	252:18
schedules	235:10	sentence	152:18	setting
60:20	276:23	109:23	service	92:4
61:4	seasons	119:14	45:7	138:25
school	175:24	245:8,21	50:17	settlement
44:24,25	sec	246:1	97:18	47:12
49:1 83:8	86:22	266:14	159:10,12	setup
116:12	seconds	sentences	172:16	75:9
scope	230:6	109:24	273:6,13	139:7
123:25	secret	273:25	services	seven-hour
124:5	9:12	separate	48:21	277:21
190:1	section	108:15	49:4	sex
191:14	104:19	127:16,25	53:7,10	283:23,24
214:14	106:25	128:24	54:10,18	285:10,
309:18	119:13,14	129:8,14,	67:6	12,22
310:4	122:2,6,	22 130:7,	72:23	sexual
score	122:2,6,	13 134:13	120:21,	9:12,19
253:10	13 248:17	142:12,15	24,25	10:4,21
scores	secured	143:9	124:13	12:6
253:25	183:24	145:1,3	155:19	13:7,10,
262:13	240:15	separately	191:10	14 14:9,
scoring	268:23	75:24	206:10,15	14 16:20,
253:17	security	129:12	208:8	25 30:7
Scott	36:8 39:4	separation	servicing	36:20
175:22	seized	25:18	159:19	41:24
205:23	261:14	September	serving	42:8,16
scratch	sell	21:23	81:1	43:2
	39:18	176:9	session	56:23,24
		177:25	76:25	57:21

GERALD BOSTOCK
BOSTOCK V. CLAYTON COUNTYOctober 14, 2021
Index: sexuality..situations

61:17	262:12	short	278:3	128:20
65:2,19	Shawn	222:9	sic	175:17
208:20	30:4,15	272:10	23:20	243:4
209:23	246:22,23	shortened	25:2	253:3
210:11	247:6,22	57:18	94:23	significant
224:16	248:19,22	shortly	255:18	252:13
225:4,25	249:6	9:23	273:9	signing
226:13,23	250:14	175:25	299:18	107:19
232:4	251:9	show	side	similar
261:19	279:16	52:18	43:24	97:9
263:15	280:7	92:13	44:1,2	170:18
264:9,11, 24 265:18	281:11,18	98:1	87:15,21,	201:19
267:21,24	Shelley	109:9	23 89:23	262:8
268:11, 14,17	37:2 38:5	111:13	292:15	Simmons
270:19	74:19	115:8	sides	128:21
281:12	sheriff's	120:3	97:23	214:12,14
283:23	40:16,24	143:5	204:17	215:1
284:12	41:5,16,	145:25	sigh	single
297:18	17 42:14	146:4,7, 10,14	300:22	21:13
309:14	Sheryl	156:21	sign	183:16
sexuality	66:7,13, 23 90:7	167:12	39:2	212:15
9:15	shift	179:22	107:9	sir
14:22	250:2	181:19	254:15,20	207:19
17:21	289:12	183:19	signage	sister's
18:13,19	shifted	195:13	165:9	282:4
19:1,9,18	100:11	203:5	240:14	sit
30:21	Shirley	213:13	signatory	126:19
58:14	74:16	221:1,3	118:7	232:7
70:8	266:15	237:25	133:14	sitting
217:22	shirt	244:16	signature	32:23
218:6	211:4,20	251:24	117:20	90:3,4
shadowed	290:15	254:10	118:7	138:24
97:10	shirts	265:2	133:13	142:23
shaking	110:7	272:1	253:3	241:20
6:12	211:3	275:11	275:17	289:4
Shallowford	233:23	278:15	signatures	situation
39:21,22	290:7,10, 12 291:5, 8,10	showed	107:9	59:3
shape	8,10	67:16	133:13	165:15
170:5	shop	282:12	signed	situations
shared	166:20	showing	106:22	48:16
38:17		103:25	107:6	56:6
225:3		197:12	116:19	
		275:4		

GERALD BOSTOCK
BOSTOCK V. CLAYTON COUNTY

October 14, 2021
Index: skills..special

skills	snicker	11, 16, 25	44:17	sources
82:9	11:1	177:1, 2,	son-in-law	78:12
skin	12:15	12, 22	23:12, 18	130:6
86:23	social	179:2	41:12	142:7
87:3, 12	23:11	194:3, 8	son-in-laws	281:19
slammed	39:4	198:20	23:19	South
33:25	41:4, 8, 21	201:21	sordid	169:8
35:17	42:12	217:23	27:2, 5	Southern
Slay	43:15	218:15, 19	sort	175:19
10:3	45:6	219:3	11:2	177:22
13:18	60:24	220:3	12:15	Southlake
14:5, 12	219:16	222:4	21:2 39:1	239:15
31:12, 25	242:7	223:15	62:6	Southpark
35:13, 25	246:18	225:12	72:25	175:21
36:2, 17	250:25	226:9, 14,	79:21	space
64:22	284:18	24 227:9	95:25	140:23
70:1	292:16	228:8, 25	126:21	202:20
78:22, 24	293:5, 21	229:2	129:1	248:25
79:10	295:16	231:20, 21	141:5	speak
204:8	socializati	232:4, 18,	175:18	58:22
213:21	on	21, 25	202:1	95:7, 9
219:20	222:10	237:8, 23	300:17	114:5
220:2, 4	socialized	261:10,	305:4	144:9
222:2, 25	22:1	14, 21	sorted	222:16
238:22	socializing	262:2, 19,	95:23	286:18
240:17	23:21	24 263:20	sound	297:7
243:19	sociology	267:17	258:25	304:17
244:20	45:20	270:8	283:3	speaking
246:5	softball	274:18	sounds	26:17
287:4, 18	34:1	275:22	275:24	93:25
sleep	35:18	276:1, 13	283:5	130:15
292:20, 21	36:21	Softpaw	soup	217:13
slip	37:9, 22,	175:19	21:2	227:19
287:16	23, 25	sold	95:13	292:16
slur	38:3, 7, 9,	40:3	source	309:24
12:5	10 68:23	solely	91:1	special
small	69:15, 20,	94:23	99:14	75:1
142:1	25 70:9	somebody's	118:21	122:24
smaller	110:3	282:3	306:1, 25	168:20
101:1	111:19, 22	someone's	sourced	169:21
smile	112:13,	87:3	98:24	206:7, 15,
12:15	14, 15	157:5	99:9, 20	25
	175:6, 7,	son		
	12 176:3,	23:22		

GERALD BOSTOCK
BOSTOCK V. CLAYTON COUNTYOctober 14, 2021
Index: specific..start

specific	165:11	154:23	276:2	243:6,11
78:17	215:2	163:20	sponsorship	244:1,2,
156:4	spending	182:9	s	11 245:4
187:19	34:2	183:25	110:5	246:5
215:23	35:19	184:1,4,	121:2	247:10,
269:5	108:5	6,23	213:17	21,24
specificall	111:9	206:3	240:15	252:13,23
y	187:4	211:23	spring	253:1
18:4	189:23	221:10	176:4	255:9,21
70:22	spends	224:1	SSL	256:5
109:3	127:21	231:20	175:19	281:25
128:11	spent	232:17	176:6,10,	290:13
134:17	113:9,16	276:20,25	13,22	staff-
160:21	135:15,24	277:1,7	177:5,17,	related
163:16	136:3,7,	sponsored	22 178:3,	241:1
171:8	22 150:21	141:13	6,7,9,13,	stages
219:18	186:19	162:7	24 229:5	157:20
252:16	189:20	190:5	Stacey	Stalimire
270:10	214:21	sponsoring	67:5	204:2
297:9	223:14	182:13	282:15,20	stamp
309:24	279:11	184:8	staff	49:8
specifics	284:20	276:9,12	10:25	153:19
38:13	spiel	sponsors	11:21	230:4
215:7	6:4	21:3	19:20	245:2
speculate	split	96:2,11	20:10	stamped
271:7,15	142:20	121:13	29:5	115:11
speculative	299:6,11	172:12	30:10	158:4
271:14	splitting	187:5	36:19	167:24
Speedway	142:23	198:21	38:6	252:2
166:17	spoke	201:23	49:22	stand
spelled	70:12	210:21	51:14	83:19
44:8	208:6	220:21	75:11,18	84:1
116:11	274:1,4	232:6	78:23	213:10
spells	297:6,14	241:22	79:11	219:24
106:7	spoken	243:1	141:19	224:15
spend	41:22	sponsorship	152:1	225:23
71:3	sponsor	95:9	162:21	253:6
94:14	110:3	110:7	168:4	261:18
102:22	112:15	111:20	183:6,11	stands
103:5	121:10,11	205:10	192:3	18:6
134:23	150:2	210:14,16	240:20	66:10
137:21	152:9	221:21	241:16	96:20
138:1	153:2	222:4,22	242:1,5,	start
		223:2	11,15,20	
		233:21,25		

GERALD BOSTOCK
BOSTOCK V. CLAYTON COUNTY

October 14, 2021
Index: started..stumbled

12:11	state	272:24	steps	225:3
49:5	45:4,5,6,	287:8	138:11,	231:1
108:3	22 81:24,	288:20	13,18	straight
234:20	25 97:1	statements	255:1	271:10,
277:13	111:19	33:17,21	Steve	11,12,13
290:3	112:5	34:13	219:21	strangers
started	143:11,15	140:1,7,	220:6,15	237:18
5:15 9:25	144:1,7,	18 146:16	223:5	street
21:12	14 192:8	148:12	Stevens	4:7 33:11
24:9 28:2	263:5	149:5	66:2	41:14
39:1 49:8	276:8	167:19,21	stick	97:24
52:25	301:24	193:10,13	156:23	247:15
53:1	302:3	195:19	194:15	stress
57:20	305:14,16	197:9	sticky	292:8,10
58:10	308:2	224:25	194:12,16	295:7
60:15	stated	227:21	Stinson	297:8
91:5	15:19	228:4,10	198:25	298:3
108:1	66:24	246:22	199:3,10	303:2
109:5	67:19	247:6	200:14	stressful
111:4	86:9	272:11	201:12,14	292:5
141:21,23	110:7	states	202:10,25	294:19
176:1,8	118:6	5:4	stipulate	297:23
177:13,	120:13	50:24,25	5:16	309:5
19,24	133:18	243:19	stood	strike
178:7,19	145:7	stating	35:17	152:10
195:2,3	159:6	33:25	stop	249:23
196:3	173:19	128:13	35:16	279:14
229:13	180:15	status	65:17	strong
233:6	199:15	85:10,18,	286:5	174:7
234:25	214:9	25	stopping	214:18
249:8	281:14	stay	55:18	structure
270:8	297:15	70:13,14	56:19	73:12,13
283:18	statement	71:3,10	store	76:7
292:23	34:14	296:4	58:4	structures
294:8	37:9,11,	staying	stored	239:17
307:17	12,15,17	29:10	164:11	struggling
starting	109:13,20	70:19,21	storewide	135:19
112:12,20	130:10	71:16	57:15	185:23
113:10	132:3	step	58:2	292:19
174:25	147:16,20	75:24	story	stumbled
196:5	148:16	97:3	36:25	242:23
starts	197:8	206:13		
238:23	241:5,6	302:18		
240:25	247:15			
	249:5			
	255:2			

GERALD BOSTOCK
BOSTOCK V. CLAYTON COUNTY

October 14, 2021
Index: sub-question..system

sub-	suggest	128:11,17	support	surmising
question	70:10	168:4	63:9 93:2	16:2
265:23	suggested	supervised	97:9	surprised
subbed	51:17	74:21	104:25	18:1,2
229:18	57:13	105:11	130:17	19:4,7
subgroup	276:16	106:17	131:3	surrounded
96:17	suggesting	supervision	143:14	37:21
97:4	218:19	75:13	144:15	surrounding
subject	257:25	supervisor	145:9	18:5
46:15	suggests	51:2	152:23	suspect
309:10	76:17	61:18	183:19	48:7
submit	suit	63:23	276:19	257:10
77:7	47:11	74:11	297:1	supported
83:15	summer	77:24	225:21	suspected
242:12	239:9	83:23,25	supporters	84:5
submitted	Summerfest	254:3,4	220:21	257:22,23
8:19	239:8,11,	supervisors	supporting	suspicion
34:14	12 240:7	73:17	63:6,8	46:8
67:2 69:2	255:11	74:2,7,14	105:22	Sutherland
83:22	sun	75:3,5	155:3	174:11,
109:11	242:3	76:9	186:25	14,21
140:1,3	Sunday	77:25	supportive	swear
178:5	235:23	78:21	62:23	4:18,20
242:15	super	79:6	supports	swearing-in
254:25	308:14	253:15	191:15,16	80:22
265:4	Superhero	supervisory	suppose	Sweat
282:9	188:17	64:1	29:3	20:6
substance	Superior	252:11,19	139:3,24	22:1,7,
8:7	47:21	supplement	154:14	16,20,22
substantial	52:8,14	72:25	246:3	23:8,24
ly	81:16,21	234:1	293:13	24:6,13
52:12	82:12,16,	supplemente	supposed	25:24
successful	22 88:4,	d	186:23,24	52:1
97:20	23 91:16	64:18	supposedly	sworn
192:6	98:25	supplies	257:7	79:17
197:5	99:21	165:4,6,	surface	80:9 81:6
sudden	117:22	16,20	68:24	sworn-in
42:3	118:23	181:3	surgery	223:22
219:8	119:6,9	187:4	297:20,	290:7
suddenly	124:10,13	supply	21,24	system
42:5	125:15	156:3	298:1,2	97:8
	126:8,19	234:1		126:14

GERALD BOSTOCK
BOSTOCK V. CLAYTON COUNTYOctober 14, 2021
Index: T-SHIRT..termination

289:14	69:10	175:8,9	209:20	173:1,22
	80:23	207:22,23	telling	199:4
T	85:7 93:6	208:18	38:2	200:23
	106:2	209:3,9	93:16	207:3
T-SHIRT	111:24	210:21,	112:22	208:7,17,
210:21,24	112:1	22,23	227:7	20 209:5
290:22	116:6	211:5	228:6	224:13
T-SHIRTS	150:1	212:6	259:19	225:25
210:25	173:14	219:4	266:4,22	226:4,6,9
tab	205:5,10	220:12,	temporarily	230:20
112:21	209:18	17,22	39:19	231:22
takes	212:19	221:9	ten	251:10
173:20	219:19	222:4	116:5	261:10,18
taking	233:20	223:15	218:14	264:11,19
7:13	241:8,20	225:12	224:20	265:17
157:10	246:23	226:14	Tennessee	267:24
223:18	248:17	228:25	192:12	268:17
255:1	266:11	229:2,8	tent	270:4,18
talk	272:25	230:14	241:19,20	271:2
56:6 72:4	274:6	231:20,21	242:8	275:9
121:12	303:2	232:18,21	tenure	281:24
126:20	307:15	234:3	75:17	289:2
156:12	309:19,23	236:1	291:22	297:15
198:23	talks	237:8	terminates	269:16
204:7	122:22	238:8	terminating	13:9
237:16	123:20	270:10	termination	31:3 32:1
240:17	tap	272:16	term	33:19
258:12,16	304:10	275:22	23:25	35:3,9
297:9	306:25	276:1,13,	100:20	36:16
talked	target	20,24	106:9	36:16
8:4 59:17	246:23	277:1,7	136:15	42:5
118:19	247:1,2,7	282:9	245:17	46:14
132:10	tasks	301:10,11	terminate	64:23
141:3	54:17	teammate	251:9,11	65:18,20
183:17	team	213:11,12	254:25	69:4,23
227:5	9:5	teammates	261:13	78:22
276:11	59:21,25	236:13	262:2	108:4
280:19	60:5,23	teams	263:19	208:5,9
287:2	61:2,7,25	61:7	terminated	209:10
297:13	61:2,7,25	176:12,20	35:1 55:9	210:12
talking	83:11	technically	60:10	223:13
11:13	110:3	53:20	67:25	225:17,19
59:16	111:19,22	251:10	68:25	227:22
	112:13,	televised		
	14,15			

GERALD BOSTOCK
BOSTOCK V. CLAYTON COUNTYOctober 14, 2021
Index: terminology..time

228:10	33:23	136:11	164:3	threats
235:4	34:10,23	287:7	185:23	252:23,25
260:14,22	35:12,25	308:18	216:24	three-part
261:12	36:3,18,	testify	236:17	139:14
264:17	19 37:3,	47:16	260:16	three-year
267:22	24 38:6	263:5	things	296:1
268:9,15	40:17	271:8	25:4	ticket
270:15	66:7,13,	285:10,22	27:14	110:5
274:25	23 69:25	286:7	61:12	243:5
282:2	79:3	testifying	62:25	tickets
283:18	89:13	131:25	93:19	161:19
287:2,12,	90:7	testimony	97:16	162:7,12,
16,23	111:2,25	4:21 8:7	104:20	15,17,20
288:1	112:21	14:17	163:25	240:10,11
291:25	116:22	34:13,18,	218:16	tie-in
294:1,25	135:4	21 62:19	219:6,7	213:14
295:6,13	171:4	69:1	224:22	time
296:9,12	204:8	111:14	297:6	4:3 10:18
297:10,	209:19	213:4	thinking	11:24
13,20,21	213:22	264:25	69:17	14:21
298:14	216:10	284:15	112:4	15:1,9
300:19	219:21	285:1	163:2	18:8
301:2	220:1,6,	286:20	179:16	19:18
303:3,4,	15 221:5	308:21	thought	22:8
12,15,22	223:1,5	text	25:16	23:18
304:8,11	258:18,21	227:11	56:24	28:16
306:11,24	266:22	228:13,15	146:9	29:16
307:9,16	267:7,14,	texted	203:3	31:3,25
308:21	25 268:18	228:5	220:10	32:5,15
309:13	271:20	Thai	242:10	33:18
terminology	308:19,24	156:10,17	263:23	46:4 51:9
269:13	309:22	therapeutic	274:16	57:11
terms	310:2	ally	276:15	59:9,12,
120:16	Teske's	227:12	284:6	23 60:9,
131:1	15:11	therapists	thoughts	22 64:2
165:25	22:20	60:25	276:5	65:5
186:10	66:7	thereof	281:5	68:17
Teske	284:16	249:2	thousand	69:12,24
9:18	286:16,	thing	173:9	70:18
14:16	17,18	72:14	threatened	71:2,17
16:19	testified	95:25	35:21	77:6
22:2,7,20	33:2,20	113:11,12	40:15	78:21
23:2,7,	34:5	threatening	threatening	82:25
10,12,17,	48:14	42:15		84:18
10,12,17,	64:23			
21 31:2	108:25			

GERALD BOSTOCK
BOSTOCK V. CLAYTON COUNTYOctober 14, 2021
Index: timeline..trained

85:4	90:5	260:13,22	title	275:25	267:4
91:14		264:13,	50:10	279:2	tournaments
92:9		20,24	53:2,4,	287:16	212:5
100:25		267:6	16,18	294:12	238:3,7
103:18,21		276:10	75:11	296:1	
108:1,2		277:22,25	76:17	297:14	town
114:11,23		283:17	titled	302:2	171:14
115:1		284:20	115:10	Tom	239:16
120:17		288:15	today	4:13	Towne
129:4		289:16	6:14	tone	239:14
135:23		291:7,17	7:10,21	37:14	townhome
137:17		294:1	8:4 9:4	top	40:4
140:22		295:23	24:13	107:1	Townhomes
141:1		296:1	33:21	119:12	39:21
145:5		302:6,17,	70:23	148:9	townhouse
148:15		22 303:4,	115:13	184:18	39:19
150:17		12 304:7,	138:24	187:25	
151:22		15 307:9,	157:9	194:21	toy
166:4,15		13,16	204:25	195:21	18:8
173:13,20		308:20	267:13	248:13	96:22
174:8		310:13	281:18	272:24	98:6
175:14		timeline	289:4	296:4	150:18
180:22		35:2	297:2	topic	165:4
186:12		68:24	304:2	68:4	182:23
192:24		172:22	305:1	topics	184:6,8
193:3		times	308:19	160:3	toys
195:9		14:19	Today's	tore	96:23
201:9		15:24	4:2	227:13	151:4
204:1		20:3	told	228:18	165:8
206:10,15		56:10	12:10	total	track
207:3		65:22	13:18,25	28:3	86:5,6
220:10		69:3	17:6,23	126:3	296:4
221:6,7		71:24	29:23	307:8	tradition
227:17		75:16	30:6	touch	290:6,8
228:5		78:2	32:19	24:12	trafficking
230:4,22		115:13	35:12,16,	tour	161:7
231:2,8		134:7	22 37:1,	96:1,6	179:24
233:13		157:13	19 38:5,6	tournament	trailing
234:12		180:17	128:17	212:12,15	148:15
237:4		261:3	199:1,3	234:15,25	trained
242:3,12		timing	200:7,13,	238:4,5	105:10
243:7		165:15	25 201:12	266:25	106:16
245:23		tiredness	207:8		151:18
246:18		295:14	215:12		
248:5			266:15		
249:22,24					
250:9,13					

GERALD BOSTOCK
BOSTOCK V. CLAYTON COUNTYOctober 14, 2021
Index: trainer..unaware

trainer	207:3	301:9	truth	79:7,11
256:23	208:4		4:22,23	TV
257:14,17	213:20,24	treatments	7:3,4	33:10
	214:15,23	237:14	280:24	230:24
training	221:11	tremendous	TTF	type
67:8,21	224:3	292:21	59:25	24:23
76:24,25	242:10	trial	Tucker	49:19
77:19	256:25	7:5	39:23	62:12
78:8	273:10	trip	Tuesday	84:13
79:22,25	276:14	158:6	35:5	153:23
80:5,8,9,	trainings	trouble	turbulent	154:16
14,17,21	77:17	72:6	245:20	156:2
81:2,6,7,	transcript	truck	turn	219:17
18,22	272:18	97:22,23	106:24	245:23
82:1,5	transferred	199:21	113:3	302:9
90:21	51:10,13	200:12	144:12	types
97:7	52:1	201:5,9	153:18	63:16
106:18	transpire	204:14,	158:25	157:25
120:12	199:13	17,19	161:15	163:25
121:16,19	travel	239:23	164:21	296:3
123:15	78:1	true	179:5	typically
124:24	travel-	22:19	184:13	20:22
125:7,11	related	23:6	187:21	195:10
128:15	78:5	27:18,22	222:14	289:25
136:18	traveled	37:9,11	248:12	typo
137:6,11	82:3	84:20	252:9,18	203:14
138:2	treasure	86:13	turned	typos
144:16	107:8	130:10	75:16	272:14
145:19	treasurer	224:24	90:11	
153:24	107:7,15,	255:1	211:4	
154:6	18 111:5	260:12	215:19	
158:17,23	114:11	265:13	Turner	
159:23	129:4	274:22	17:3,16,	uh-huh
160:1,16,	135:23	279:12,13	17 18:3,	6:10
21 161:6	treated	280:14,16	25 32:20	uh-uh
164:2	42:19,20	283:17	172:15	6:10 42:9
168:23	43:1,6	trust	173:9	unable
170:7	treatment	25:24	turns	83:21
171:2,5,	59:21,25	26:1,5	302:1	242:24
23 180:20	60:5,23	249:6,13	Tuttle	unannounced
183:15	225:22	trustworthy	11:23	250:24
186:11	294:4	139:15,21	12:3	unaware
189:15,		249:17	62:16	
21,24				
190:5,8				
191:9				
192:1,9				

GERALD BOSTOCK
BOSTOCK V. CLAYTON COUNTYOctober 14, 2021
Index: unbecoming..video

25:18	116:8	60:22	297:18	199:19
unbecoming	118:11	301:18	upwards	241:14
297:16	121:6	United	84:23	300:4
uncle	125:18,25	5:4	212:14	vehicles
43:24	126:7	units	urologist	159:13
44:7	127:20	53:10	294:7	venture
uncomfortable	133:6	59:23	295:19	189:7
17:20	134:5	universe	Urology	venturing
37:19	143:20	98:19	295:20	29:10
42:17	150:13	123:19	USAA	verbal
undergo	152:21	University	304:1	6:9 61:8
79:21	182:4	45:6,7	306:18	213:11,16
123:15	245:11,	unlike	usage	verbiage
297:19	15,17	221:16	14:20	15:6
understand	274:23	unprofessional	usual	verified
6:4,18,25	287:14	243:13,16	289:18	95:24
27:5,11	understood	unscrupulous	utilizing	265:1
38:5 74:8	6:22	139:6	151:23	Verizon
81:11	225:11	untruth	<hr/>	151:21
115:4	226:11	255:18	v	179:6
123:2,5	undue	untruthful	<hr/>	version
191:13	298:3	255:15	V.I.D.	57:18
206:22	unemployment	279:17	96:8	versus
213:1,21	272:13	unusual	Valdosta	5:3 70:21
218:3	288:4	198:13	44:25	82:12
223:19	292:11	unusually	45:4,6,22	88:21
259:24	unfriended	197:3	49:16	187:18
understanding	41:4,8,20	updated	Valley	vested
47:7,9	unfriending	77:25	160:5	304:7
54:6	42:12	updates	varies	victim
67:24	unfriendly	80:17	157:25	46:19
79:1	42:15	upgrades	variety	48:5
90:23	unfriends	299:19	61:11	199:15
93:15	42:5	upset	vary	victims
94:13	uniform	37:5,7	80:6	66:11
98:18	210:20	227:4	vehicle	72:22
100:19	uniforms	ups	97:25	144:10
102:2	210:17	42:5	159:7,11,	223:20
106:20	234:9	upset	13,15,17,	video
109:4	unit		19,20	59:10,13
114:3	49:9			103:16,
115:11				

GERALD BOSTOCK
BOSTOCK V. CLAYTON COUNTY

October 14, 2021
Index: videotape..wanted

19,22	170:20	17,20	81:1,7,23	
114:24	vital	157:7,10,	82:4,8	W
115:2	139:12	15 158:17	93:4	
192:25		160:16	96:11,17	wait
193:3	VOCA	162:14	97:4,6,14	129:7
216:20	66:10,18,	164:2	105:3,11	134:7
217:8,13	22	168:4,24	106:17	269:7
218:12	voice	169:16	120:16	305:17
224:18	60:6	171:22	122:23	
225:3,11	83:20	173:6	123:20,21	waited
226:21		179:17,	124:25	242:11
227:1	voluntarily	19,20,21	137:12	waiting
228:23,24	301:5	180:19	142:6	152:3
229:10,	volunteer	183:14	145:20	241:1
11,22	17:2 18:5	189:15	150:13,20	269:5
233:14,17	73:17	190:12,16	151:18	
277:23	74:2,7,	191:2	154:14	walk
278:1	11,14	192:7,11,	156:18	212:14
302:20,23	75:3,5	20 205:12	157:21	walked
310:14	76:8,9,23	206:10,	158:24	87:5
videotape	80:18	14,21,25	160:1	135:8
4:4	81:15,16,	208:25	162:8,11,	198:6
viewed	21 82:18	213:6,12	18	221:15
232:2	83:4,5,7,	223:22	168:14,	242:6
Virginia	18,21,23,	249:9	15,17,25	
220:18	25 84:1,	257:15	171:6,11	walking
Visa	10,14,17,	289:18,	172:12	257:4
306:17	20 88:21	21,22	173:24	wall
visibly	90:22	290:1,5	174:11	91:12
292:18	93:5	291:13	181:20,22	92:8
visit	105:4,24	volunteered	182:1,2,3	104:15
83:7	120:11,	151:9	183:22	212:8
246:18	17,18	174:13	186:12,20	
294:16	121:5,9,	206:17	189:1,17,	wallets
visited	11,18,19,	volunteerin	25 191:10	89:18
35:13	24 122:4,	g	198:21	wanted
visiting	7,14	156:23	201:23	62:4 68:5
284:24	123:6,7,	208:8	205:8,16	75:23
visits	9,14	volunteers	206:8,23	127:25
294:8,10	124:17,	21:16	214:20	128:11,12
296:5	20,21,23	51:3 64:9	232:6	129:13
visual	136:17	74:22,25	290:7	130:11
	151:12	76:19,22	291:3	132:16
	154:7,8,	79:15	vote	133:2
	18 155:2	80:9	110:9	134:2
	156:13,		113:7,15	141:18,25
				151:2

GERALD BOSTOCK
BOSTOCK V. CLAYTON COUNTYOctober 14, 2021
Index: warn..worker

162:12,16	wedding	where'd	word	246:13,
214:20	23:20	44:24	14:19	15,19
215:19			15:16,23	249:12
242:20	week	whistleblow	16:5 25:7	256:19
262:1	70:20	er	33:24	258:3
266:3,10	71:21	280:5,8	63:11	260:21
267:8,14	80:7,11,	white	65:15,22	288:6,18
268:1,18	12 84:22	270:22,24	69:2 72:7	289:4,9
275:1	95:22	271:2,6	111:21	299:25
303:21	202:11,15	Wi-fi	149:19,25	301:17
304:13	290:2	151:24	215:13	302:9
	297:2,3			
warn	weekend	wife	wording	work-
247:21	71:25	22:7,20	214:1,3	related
warned	199:22	44:7 66:7	272:15	48:16,18
247:10	201:4	William	words	worked
wash	234:17,18	4:11 44:7	17:18	9:19
159:4,13,	235:5	window	63:16	10:5,22
20	257:5	249:1	73:22	14:24
washing	weeks	307:8	208:11	18:3,11,
159:19,25	80:4 81:3	windshield	216:3	25 19:5,
Washington	116:5	159:17	217:16	18 20:1
144:8	298:10	Wireless	218:24	23:18
watch	weight	151:21	258:8	29:6,16,
83:11	69:20	179:7	275:23	18 32:5,
watched	293:2	wishy-washy	work	15 33:4
218:12	weird	75:9	18:6 22:2	49:1
watching	186:7,9	witnesses	39:2	51:10,15
210:10	welfare	47:3	49:19	52:9
226:21	48:21	231:14	50:15	72:22
water	49:9,10	wives	51:8 52:5	77:17
123:10	53:7,10,	97:13	60:4,15,	82:25
234:1	13 54:9,	woman	24 81:16	89:8
waving	18 67:6	271:11	93:16	102:22
210:3	72:5,6,8,	283:12	101:4	119:20,23
ways	14,17,18	women	103:8	155:19
171:10	73:12,14	271:20	145:17	173:23
wear	75:19	women's	152:2	174:8,9,
290:15	Wells	232:18,24	157:7	13 175:14
291:5,15	44:15	Wooten	168:23	181:16
website	West	30:4	181:21	191:3
170:11	50:22		190:12	195:9
	51:14,25		231:10	309:3
			239:20	worker
			245:10,	49:10
			12,22	292:17

GERALD BOSTOCK
BOSTOCK V. CLAYTON COUNTY

October 14, 2021
Index: workers..Zeros

293:5,21	wrongdoing	24:4,7,15
295:16	139:1	27:25
workers	wrongfully	28:4
50:11	261:10	38:24
working	289:2	50:4,13
9:11	wrote	71:2
12:13	265:10	76:13
48:19		100:12
54:4 88:2		121:5
124:20	<u>Y</u>	175:24
174:6		218:14
179:3	yard	221:18
182:22	72:1	224:20
238:12	year	289:10
247:7	21:22,24	youngest
277:2	28:6	44:13
289:12,	29:25	
13,16	49:1	<u>Z</u>
world	51:21,25	
231:3,4	53:5	Zeros
235:2	100:20	277:19
worry	101:4	
202:3	144:9,17	
write	150:20	
217:16	152:23	
251:2	159:9	
write-up	164:9,11	
259:17	167:19	
writing	173:7	
64:5	174:8	
167:4	180:17	
254:15	182:25	
260:6,9	196:22	
written	239:13	
167:2,6	252:14	
246:16	258:23	
256:11	289:24	
259:10,16	290:2,4	
wrong	291:3,20	
112:17	294:14	
138:16	year's	
243:22	66:25	
254:5	years	
	20:1,3	
	21:14	