

In The Matter Of:

Bostock v.

Clayton County

Sabrina Crawford

February 19, 2021

Video Deposition

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

GERALD LYNN BOSTOCK,

Plaintiff,

CIVIL ACTION NO.

vs.

1:16-CV-01460-WLR-WEJ

CLAYTON COUNTY,

Defendant.

The Video-recorded Deposition of SABRINA CRAWFORD,
taken on behalf of the Plaintiff, pursuant to the
Federal Rules of Civil Procedure, before Maureen S.
Kreimer, CCR B-1379, Notary Public, at 600 Peachtree
Street, N.E., Suite 3900, Atlanta, Georgia on Friday,
February 19, 2021 between the hours of 10:03 a.m. and
1:45 p.m.

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16 Also Present: Gerald Bostock, Plaintiff

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23
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1 (Whereupon, disclosure as required by the
2 Georgia Board of Court Reporting was made by the
3 court reporter, a written copy of which is
4 attached hereto.)

5 (Time noted 10:03 a.m.)

6 THE VIDEOGRAPHER: We're now on the video
7 record at 10:07 a.m. The date is February 19,
8 2021. This is the start of video file number
9 one. Would the court reporter please swear in
10 the witness.

11 (Witness duly sworn.)

12 MR. BUCKLEY: All right. This will be
13 the deposition of Sabrina Crawford. It is
14 taken in the case of Gerald Lynn Bostock versus
15 Clayton County, Civil Action Number
16 1:16-CV-01460-WLR-WEJ.

17 It's taken pursuant to notice and
18 subpoena, which was served on Ms. Crawford.

19 (Plaintiff's Exhibit [P-1](#) marked.)

20 SABRINA CRAWFORD,
21 having been first duly sworn, was examined and testified
22 as follows:

23 EXAMINATION

24 BY MR. BUCKLEY:

25 Q. Mrs. Crawford, I want to show you what's

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1 marked as Plaintiff's Exhibit No. 1, and ask you if
2 you can identify that as the subpoena that you -- was
3 served on you, and which is compelling you to be here
4 today.

5 A. Yes, it is.

6 Q. Okay. Good.

7 MR. BUCKLEY: So this deposition is taken
8 pursuant to the Federal Rules of Civil
9 Procedure. All objections except to the form
10 of the question will be reserved until the time
11 of trial, or until such other time as the
12 deposition is to be used in evidence.

13 BY MR. BUCKLEY:

14 Q. Ms. Crawford, I'll give you a couple of pretty
15 straightforward ground rules for this deposition, and
16 then we'll proceed with some questions.

17 A. Okay.

18 Q. First of all, I'm going to be asking you
19 questions, and my purpose is to get information.

20 If I ask you a question for any reason you
21 don't understand, just say so. I'll try to rephrase
22 it so you understand it.

23 A. Okay.

24 Q. Are we agreed?

25 A. Yes.

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1 Q. Because if you don't -- and you don't
2 understand, I'm going to assume you understood it and
3 your answer is a truthful answer to that question.

4 A. Okay.

5 Q. You do know you're under oath, under penalty
6 of perjury, of course; right?

7 A. Yes.

8 Q. All right. And so when I am asking you
9 questions, if you're answering a question and I cut
10 you off in the middle of an answer it's only because I
11 think you've finished your answer, if you haven't,
12 just say so. I'll let you finish and say whatever you
13 need to to make your answer complete. Are we agreed?

14 A. Okay.

15 Q. And sometimes you may anticipate my question
16 as I'm asking it, you'll cut me off. It's a very
17 natural thing. Lots of people do it because I speak
18 slowly sometimes. And I'll tell you if that happens
19 so that I can ask my complete question, then you can
20 give your complete answer, and we'll have a better
21 record for doing that; agreed?

22 A. Okay. Agreed.

23 Q. Okay. Are you laboring under any disability
24 or taking any medication that would render your memory
25 or your testimony less than accurate?

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1 A. No.

2 Q. All right. Great. Well, you generally know
3 that we are here because Gerald Bostock has sued
4 Clayton County for sex discrimination, and
5 specifically discrimination based on his sexual
6 orientation; correct?

7 A. Correct.

8 Q. And you are probably aware that on the
9 question of whether or not he can sue on sexual
10 orientation, the case was taken to the United States
11 Supreme Court, which found that he could, in fact,
12 bring the case.

13 Are you just generally aware of that?

14 A. Yes.

15 Q. All right. So we're here today just to ask
16 you questions about things you know surrounding his
17 termination from Clayton County. And before we do
18 that, I want to get a little bit of background
19 information on you, and then we'll proceed.

20 So what is your full name?

21 A. Is Sabrina Lynn Crawford.

22 Q. L-Y-N-N?

23 A. Yes.

24 Q. And what's your home address?

25 A. REDACTED

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1 REDACTED

2 Q. And how long have you lived there?

3 A. A month, one month.

4 Q. Oh, one month. You just moved, hum?

5 A. I just moved.

6 Q. Where did you live before that?

7 A. Clayton County, REDACTED

8 REDACTED

9 Q. Okay.

10 A. REDACT

11 Q. Why did you make the move?

12 A. We lived on the lake, and lake prices are
13 better than they've been in a long time, so we took
14 advantage of the opportunity to make a profit on our
15 home.

16 Q. I see. Okay. Great. So you had been there
17 for a good period of time; right?

18 A. So, actually, we had lived at that lake house
19 for about 15 months, but we have lived on Lake Spivey
20 for about ten years.

21 Q. Do you still have your place on Lake Spivey?

22 A. No. We sold it.

23 Q. Okay. And you -- are you originally from
24 Georgia?

25 A. Yes.

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1 Q. I thought that accent was Georgia.

2 A. Georgia all my life.

3 Q. Where did you grow up?

4 A. Marietta, Smyrna area.

5 Q. Went to high school up there?

6 A. Marietta High School.

7 Q. Any college?

8 A. No.

9 Q. Okay. And you and your husband own a Cadillac
10 dealership; is that right?

11 A. Part-owner of Heritage Cadillac Mitsubishi.

12 Q. Where is that?

13 A. Morrow, Clayton County.

14 Q. Can you give me the address on that?

15 A. 7134 Jonesboro Road, Morrow, Georgia 30260.

16 Q. How long have y'all -- you say you and your
17 husband are part-owners of that dealership?

18 A. Right. We are a minority owner.

19 Q. Okay.

20 A. We have a partner that owns multiple
21 dealerships, and we have ownership in that dealership.

22 Q. Okay. So just so I can be clear, you're
23 part-owner. Your ownership is confined to that
24 dealership. There is a bigger entity that has -- owns
25 several dealerships?

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1 A. Correct. Our partner owns multiple
2 dealerships.

3 Q. Who is your partner?

4 A. Ernest Hodge.

5 Q. And are they all Cadillac Mitsubishi
6 dealerships, or are they other?

7 A. No, they are other and in other states.

8 Q. Okay. But the only dealership that you and
9 your husband have ownership interest in is Heritage
10 Cadillac Mitsubishi?

11 A. Correct.

12 Q. And what is your husband's name?

13 A. Tim Crawford.

14 Q. How long have y'all had ownership interest in
15 that dealership?

16 A. Since December 2003. I've worked at Heritage
17 since June of '96, but our ownership wasn't until
18 December of 2003.

19 Q. Okay. All right. So you kind of worked your
20 way into the business?

21 A. Correct.

22 Q. All right. Were you in sales, or what did you
23 do?

24 A. So primarily both my husband and I have always
25 been on the accounting side of the automotive

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1 industry, controller, chief financial officer. And
2 that has been our position for that partner, and then
3 prior to that I was controller at another dealership.

4 Q. I get it. Okay.

5 A. So my whole -- my whole career has been in the
6 car business.

7 Q. All right.

8 A. Primarily on the accounting side.

9 Q. All right. So do you have any children?

10 A. Four.

11 Q. Are they grown, or are they --

12 A. Yes, all grown.

13 Q. Good. Good time to sell the house and move
14 to --

15 A. And downsize; right.

16 Q. -- downsize a little bit?

17 A. Yes.

18 Q. And you have to throw everything away you've
19 accumulated; correct?

20 A. Or donate it, yes.

21 Q. Or donate it, great.

22 A. Yes.

23 Q. You've been involved in different charities,
24 as I understand it, over the years; is that correct?

25 A. Correct.

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1 Q. So I'd like to get a little list of that. I
2 know you're involved right now in a charity. Is it
3 for abused women, or battered women?

4 A. So I own a group home for teen victims of sex
5 trafficking.

6 Q. I don't want the address, but tell me where it
7 is.

8 A. It's in Clayton County.

9 Q. And how long have you been involved in that?

10 A. So we officially opened the home May of 2018.
11 I have served the population of victims of CSEC is
12 what it's called, Commercially Sexually Exploited
13 Children, from about 2015 until I opened the group
14 home.

15 Q. And you were doing that on a strictly
16 volunteer basis?

17 A. Completely volunteer.

18 Q. And what you're doing now is on a volunteer
19 basis, too?

20 A. Yes.

21 Q. You said you own a home. Did you buy a piece
22 of property and develop it for this purpose?

23 A. We were donated the property and -- from the
24 City, and my business partner, Mr. Hodge, paid through
25 his foundation to build the home.

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1 Q. So it was a piece of dirt --

2 A. Correct.

3 Q. -- before y'all built on it to build this
4 special home for young women?

5 A. Correct, yes.

6 Q. And how many people will it house?

7 A. Ten at one time.

8 Q. Okay. And is the idea to help them to
9 re-matriculate into society in a safe way?

10 A. Correct.

11 Q. Okay.

12 A. We are what the state calls a step-down
13 program, maximum watchful oversight. We get the
14 residents that are hardest to place. Typically
15 they're coming from -- either straight from the
16 streets, juvenile, or a psychiatric facility of some
17 sort.

18 Q. Do you ever stay at the home to help these
19 young people, or?

20 A. I'm involved as a volunteer primarily for the
21 overall operation of the home. I have a director that
22 runs the day-to-day.

23 Q. Okay. And are you the chair of the board?

24 A. Yes.

25 Q. Okay. And what is the name of that -- this is

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1 a nonprofit; right?

2 A. GiGi's House. G-I-G-I apostrophe S house,
3 GiGi's House.

4 Q. Is that -- the name GiGi's House named after a
5 particular individual?

6 A. Me. I'm a GiGi.

7 Q. You're a GiGi?

8 A. Yeah.

9 Q. So is that your nickname?

10 A. Six grandchildren.

11 Q. Oh.

12 A. That's how I am GiGi.

13 Q. That's what they call you?

14 A. Yes.

15 Q. I see. So and I'm going to guess you have
16 some training working with sexually exploited
17 children?

18 A. Some training, yes.

19 Q. Okay.

20 A. Primarily I focus on the business side of the
21 ministry.

22 Q. Okay.

23 A. Fundraising, capital campaigns.

24 Q. All right. Now, this is not the first
25 charitable endeavor that you've been involved in;

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1 right?

2 A. No.

3 Q. What other charitable endeavors have you been
4 involved in in your adult life?

5 A. Clayton County CASA.

6 Q. And just for the record, what does CASA stand
7 for?

8 A. Court appointed special advocate.

9 Q. How did you get involved? First of all, for
10 what period of time were you involved with Clayton
11 County CASA?

12 A. I believe it was around 2005. I can't swear
13 to the dates. That was a long time ago. And I
14 believe it was until about 2013.

15 Q. And were you -- now, you were the board chair
16 in 2013; correct?

17 A. Correct.

18 Q. And how long had you been board chair when you
19 left the Clayton County CASA?

20 A. A good eight-plus years, I would say. The
21 majority of the time that I served on the board was
22 board chair.

23 Q. Okay. And how many people were on the board?

24 A. Typically I'm going to -- this would not be an
25 accurate -- this would be approximate, but ten, eight

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1 to ten.

2 Q. Did everybody have the same powers on the
3 board in terms of voting, or were there any non-voting
4 members advisory members?

5 A. So if you were on the board, you were able to
6 vote. The director of CASA, which would have been
7 Gerald, did participate in all board meetings.

8 Q. Gerald Bostock?

9 A. And at times that were also staff that would
10 attend a board meeting. It was open. You could
11 attend. But as far as voting privileges, it was board
12 members.

13 Q. So our jury in this case is not necessarily
14 going to know what CASA did, or what the
15 court-appointed special advocate did. So could you
16 explain in a paragraph or so what the function of
17 Clayton County CASA was? And there is a larger CASA
18 too; right?

19 A. So we need to clarify. The board is an
20 advisory board, and the name is Friends of Clayton
21 County CASA.

22 Q. Okay.

23 A. If you just state the words Clayton County
24 CASA, it may be interpreted as it is the court working
25 under the juvenile court judges.

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1 Q. Okay.

2 A. And so we were -- we were strictly volunteers.
3 We were an advisory group. We helped support the
4 program of Clayton County CASA --

5 Q. Mm-hmm (affirmative).

6 A. -- with fundraising, helping recruit board
7 members -- well, we did have to recruit board members
8 to keep our board active, but it was to help support
9 the volunteers of the Clayton County CASA program.

10 Q. Okay. And when you say you were advisory, who
11 were you advising?

12 A. It is -- it really is more about supporting
13 the program. We did not have the authority over the
14 CASA program. We were there to help recruit
15 volunteers and to secure funds to help keep the
16 volunteers for the program.

17 Q. When you say secure funds, did you have a bank
18 account?

19 A. We did have a bank account.

20 Q. And so tell me about Gerald's function as
21 director of CASA. What did he -- what was he charged
22 with doing?

23 A. Well, Gerald did not work for the Friends of
24 Clayton County CASA, so I'm not going to necessarily
25 have his job description, or know in detail --

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1 Q. Okay.

2 A. -- what was required of him by the court.

3 Q. Mm-hmm (affirmative).

4 A. He did attend our board meetings. He was the
5 liaison between Clayton County CASA program, and then
6 the board Friends of Clayton County CASA. He kept the
7 board abreast of how many volunteers were active, how
8 the program was going, if we were able to cover, and
9 when I say "we", if the program was able to cover, the
10 amount of children that were needing a CASA.

11 He reported the numbers of what the program
12 served on a monthly basis, and kept the board abreast
13 of anything that the board would need to know in
14 relation to the program.

15 Q. And just so the jury will understand, what was
16 the purpose of the program? It was a court-appointed
17 special advocate for who?

18 A. So we -- and when I say "we", I was also a
19 CASA volunteer.

20 Q. Okay.

21 A. So just to make sure that when I'm saying the
22 words "we" I represented both as a volunteer and as a
23 board member.

24 Q. Okay.

25 A. Okay. So we, as a volunteer, would advocate

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1 for what was in the best interest of a child that had
2 been deemed abused or neglected by the court system,
3 and we helped bring information to the judge as to
4 what may be going on with the child --

5 Q. Okay.

6 A. -- that was deprived or abused or neglected.

7 So CASA would talk with teachers, if the
8 children were in school, daycare, relatives, sometimes
9 a doctor or a medical profession. We would meet with
10 the children weekly, monthly, ensuring that they were
11 getting what they deserved.

12 Q. Okay.

13 A. If they were in foster care, we would meet
14 with the foster care parents, a group home, and just
15 make sure that the child was getting everything that
16 was in the best interest of the child.

17 If there was any family that could be
18 contacted, a lot of CASAs would go above and beyond
19 trying to contact family members that maybe the court
20 system did not know existed, and see if that -- if
21 there was a possibility there was a family member that
22 would be interested in caring for the child.

23 Q. Okay. And typically you-all were advocating
24 for kids who had gotten in some kind of trouble with
25 the law; right?

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1 A. No, not necessarily.

2 Q. No. Okay.

3 A. The children may be deprived due to parents'
4 neglect.

5 Q. Okay.

6 A. So we have children -- just thinking of those,
7 a few of my cases, I had a baby that was born to a mom
8 on drugs, and so obviously that child went directly to
9 foster care from the hospital.

10 And my job as a CASA was to make sure that his
11 needs were being taken care of, and that he was in the
12 best placement, and to report back to the judge during
13 court hearings of anything as a volunteer that I may
14 see might be best for the child.

15 Q. Okay.

16 A. It may be a teenager that's parents were
17 neglecting them with food, or shelter, or an abusive
18 relationship and could not take care of the child.

19 So it wasn't necessarily that the child was
20 the issue, but more so what his surroundings, or --

21 Q. I see.

22 A. -- his family life were.

23 Q. Okay. So the overarching goal was to be an
24 advocate for these kids; right?

25 A. Correct.

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1 Q. Okay.

2 A. An advocate for the child.

3 Q. Try to figure out what was in each child's
4 best interest, and then advocate for that with the
5 court, I assume?

6 A. With the court. A CASA -- it was not uncommon
7 for a CASA to go in front of the judge and alert the
8 judge as to the findings that you have either found a
9 family member, or that maybe that child's not in the
10 right placement. I had a teen that needed to be moved
11 because the foster mom was not providing his needs.

12 Q. Okay.

13 A. And I brought that forward to a judge, and the
14 child was removed and put into a group home. And so
15 just being an advocate, being the voice for the child.

16 Q. Okay. All right. How many -- when Gerald
17 Bostock was the director, how many volunteers were
18 working? If you can just give me a rough number. I'm
19 not expecting an exact number.

20 A. I really don't. It would be guessing.

21 Q. Yeah.

22 A. But I mean, there were -- I can remember there
23 were times that we were serving a couple hundred --

24 Q. Okay.

25 A. -- volunteers.

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1 Q. All right.

2 A. And sometimes not all were active, or didn't
3 have an active case, but we would have a roster of a
4 couple hundred volunteers. I can't remember exact
5 numbers. That was a long time ago.

6 Q. So as director of the program, did Gerald
7 report to your board?

8 A. No, he did not report to our board.

9 Q. He did not. But he was present at the
10 meetings?

11 A. He was present at the meetings, and he was the
12 liaison and would help us have a better understanding
13 of the program and make sure that board members
14 understood what the program was about, and who we
15 served and how many we served, and assisted the
16 board --

17 Q. Okay.

18 A. -- with advocacy and fundraising.

19 Q. Now, did he have access to any of the funds
20 that were raised as a result of the efforts of the
21 board?

22 A. When you say access, do you mean he could
23 personally go pull them out of the bank? Or did he
24 have suggestions or requests of what the board would
25 spend that money on?

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1 Q. Why don't you tell me.

2 A. So he did not have access. He could not go to
3 the bank, withdraw funds.

4 Q. Okay.

5 A. He could not cash a check, withdraw money.

6 The board voted on or made decisions on what and how
7 we spent the money, but it was fully to support the
8 CASA program.

9 So Gerald, being the director of the CASA
10 program, may be involved in we're going to have a
11 volunteer appreciation dinner for our volunteers, and
12 Gerald and his team would make suggestions on it would
13 be great if we could, you know, thank them with a
14 trophy, or thank them with a board member of the year,
15 or. So he was instrumental in helping the board know
16 how to best serve our volunteers, but was not any time
17 that I can remember ever able to have access to the
18 funds.

19 Q. Okay. Did he have credit card access or
20 anything like that?

21 A. For the Friends of Clayton County CASA board?

22 Q. Yes.

23 A. Not to my knowledge.

24 Q. Okay.

25 A. Can I say to you that Gerald never went and

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1 bought something for a fundraiser, that -- supplies we
2 needed? I am sure that's possible.

3 Q. Okay.

4 A. But it would all be -- I can't even swear that
5 it even happened. But if we needed to go and buy
6 materials for the Duck Derby, or the race, he was very
7 much so a part of helping us with that fundraiser.

8 So if he and one of our board members, Jane,
9 who was the treasurer, or even myself, would have
10 needed to go to Home Depot and buy materials, Gerald
11 may have very well have been involved in that.

12 Q. Okay.

13 A. But it was never a situation where he was able
14 to just take money out, or.

15 Q. Okay.

16 A. And he along with all of our volunteers helped
17 us sell tickets to the board --

18 Q. Mm-hmm (affirmative).

19 A. -- for the fundraiser. So just like me,
20 volunteers, our board, Gerald, Gerald's staff, we all
21 would sell duck tickets or help promote with
22 sponsorships and ticket sales, and we were all
23 instrumental in making the fundraiser a success.

24 Q. When you talk about duck tickets, the jury's
25 not necessarily going to know what you're talking

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25

1 about.

2 A. Right.

3 Q. There was an event, was it an annual event,
4 called the Duck Derby?

5 A. Correct.

6 Q. Tell the Jury what that was, and how that
7 supported Clayton County CASA.

8 A. So there was an annual fundraiser called the
9 Duck Derby, and staff, board, and a pool of volunteers
10 would help sell what we call duck tickets, or you --
11 it may even be referred to as a six-quack, because it
12 was very common that we would try to increase duck
13 sales by selling more than one.

14 So board, volunteers, staff, would work
15 throughout the year to sell as many duck as we
16 possibly could, ducks as we possibly could. In
17 addition to just selling ducks, it was also
18 sponsorship, so you could become a sponsor of the Duck
19 Derby.

20 There was 4,000 ducks, and all the ducks were
21 labeled with a number 1 to 4,000 on the bottom of the
22 plastic duck. So it wasn't a real animal.

23 Q. Not a real duck?

24 A. Not a real duck.

25 Q. All right.

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1 A. And those ducks would be numbered, and they
2 would be counted by board volunteers and staff before
3 the event to ensure that all 4,000 ducks were there in
4 attendance, were boxed up, sealed, and ready for the
5 event in hopes that throughout the year during the
6 fundraising efforts that we actually sold all 4,000
7 ducks and, therefore, would ensure a winner the day of
8 the Duck Derby.

9 All 4,000 ducks would be dumped into a pool of
10 water. Think very large slip-and-slide-type visual
11 where the ducks were pushed along the racetrack by a
12 force of water, and then at the end the ducks -- the
13 board and staff would be at the end, and would pull
14 out the winning ducks. And if you sponsored duck
15 number 2500, then you were the winner of the first
16 place prize.

17 And 100 percent of the funds were kept by
18 Friends of Clayton County CASA board, and we used
19 those funds to help support the CASA program.

20 Q. And did your dealership at one point donate a
21 prize for one of these races?

22 A. Many years --

23 Q. Okay.

24 A. -- we were a sponsor.

25 Q. Would it be a car, or something like that?

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1 A. So one year -- it may have been more than one
2 year, but we -- we -- one of the years was a
3 Mitsubishi -- oh, goodness. Let me think which car.
4 Anyway, it was a small compact car, a Mitsubishi car.
5 And the winner was, you won the car.

6 We were really trying to think of ways we
7 could increase ticket sales and sell all 4,000
8 tickets, all 4,000 ducks or tickets. And by donating
9 that car -- and when I say donating, the ticket sales
10 itself paid for the cost of the car, and then we gave
11 a monetary donation --

12 Q. Okay. Great.

13 A. -- the dealership did.

14 Q. Sounds like a very worthwhile thing.

15 And did Gerald, was part of his job to recruit
16 volunteers?

17 A. Yes.

18 Q. And did he ever recruit volunteers, to your
19 knowledge, from the gay community?

20 A. Yes.

21 Q. All right. And you didn't have a problem with
22 that, did you?

23 A. No.

24 Q. And did you become aware at any time that
25 Gerald was involved in a gay softball league?

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1 A. Yes.

2 Q. And did he approach you or your board about
3 sponsoring a team and having the Clayton County CASA
4 name put on the t-shirts for the baseball team?

5 A. Yes.

6 Q. Okay. And were -- did the board approve that?

7 A. The board did not have to approve that.

8 Q. Okay.

9 A. The board -- so every month, or any time we
10 had a meeting, Gerald and the board would always
11 update everybody on where we are with recruitment,
12 with ticket sales, with sponsors, with any potential
13 sponsors or volunteers. And during our board meetings
14 we would talk about creative ways to find people even
15 outside Clayton County.

16 Being a business owner of Clayton County,
17 sometimes you start to see that the same people are
18 always the ones that come to the table with
19 sponsorships and assistance with our non-profits. And
20 so all of us were always sitting around trying to find
21 ways that we could get the word out and advocate and
22 let people know who we are and what we do and who we
23 serve, and then, of course, trying to recruit funds
24 and volunteers to help us --

25 Q. Okay.

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1 A. -- with the program.

2 Q. You knew that he was -- he was involved with
3 the softball team that was up in Atlanta, in the
4 Atlanta area; right?

5 A. Yes. I believe -- I believe it was outside
6 Clayton County is all I really remember.

7 (Plaintiff's Exhibit [P-2](#) marked.)

8 BY MR. BUCKLEY:

9 Q. Okay. So I want to show you an exhibit. This
10 is Plaintiff's Exhibit No. 2, and just ask you if you
11 can identify this document.

12 A. Yes.

13 Q. What is it?

14 A. It is from the Clayton County District
15 Attorney's office stating that they have had a
16 conversation with me in February of 2015.

17 Q. Why, if you know, why did the Clayton County
18 District Attorney's office want to have this
19 conversation with you?

20 A. My guess would be it's because I was the board
21 chair of Clayton County CASA, and there was a, I
22 guess, allegation that our -- it was told, I guess,
23 that Gerald was -- I mean, at this time I would assume
24 he was either trying to get his job back, or was going
25 against Clayton County for a wrongful --

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1 Q. Termination?

2 A. -- termination. Sorry.

3 Q. Okay.

4 A. And they were looking to see who needed, or
5 had information.

6 Q. Now, the events that -- there is a summary of
7 a statement that was taken from you at the time of
8 this investigation, which it shows was February 11th,
9 2015. Was -- is the characterization, as far as it
10 goes, accurate?

11 A. Yes.

12 Q. All right. Now, I noticed there is a page,
13 the second page of the summary down at the bottom. It
14 appears that a new sentence starts, but then there is
15 no third page.

16 Do you know if there was a third page to this?

17 A. I do not remember.

18 Q. Had you -- I showed this to you before your
19 deposition today. Had you seen this document before?

20 A. I typed the document.

21 Q. Oh, you actually typed it. Okay.

22 A. Correct. I was asked to put in my own
23 words --

24 Q. Okay.

25 A. -- what happened. So I typed the document.

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1 Q. Mm-hmm (affirmative).

2 A. I do not remember what the third page said.

3 It was, you know, 2015.

4 Q. Yes.

5 A. But it does appear by looking at this document
6 there is a third page.

7 Q. Do you have the document at home or on a
8 computer?

9 A. Possibly. I'll have to look.

10 Q. I'll ask you if when you get finished with
11 this deposition and when you go home maybe this
12 weekend, if you could go ahead and check --

13 A. Okay.

14 Q. -- and let me know.

15 A. Okay.

16 Q. Because I would like to get whatever
17 remains -- whatever else of this document exists.

18 A. Does Clayton County district attorney's office
19 not have a page 3, to your knowledge?

20 Q. Well, this document was produced to us by
21 Clayton County. I don't know if they got this from
22 the district attorney, district attorney's office, or
23 they had it in some other file. So I don't really
24 know the answer to that question.

25 A. Okay.

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1 Q. But this is what they produced, and it does
2 appear that there is another page that's missing.

3 A. Okay.

4 Q. So I just ask you if you can look.

5 A. I will.

6 Q. I'll certainly ask Mr. Hill if he can check
7 and see if there is anything else, any other portion
8 of the statement.

9 MR. BUCKLEY: Would you agree to check
10 that out, Mr. Hill?

11 MR. HILL: Yeah, I'll check. I mean,
12 this is the copy that we have. I'm not aware
13 of a third page. I agree that it looks like --

14 MR. BUCKLEY: Right.

15 MR. HILL: -- that looks like that's
16 incomplete on the second page.

17 MR. BUCKLEY: Great.

18 BY MR. BUCKLEY:

19 Q. Okay. So we're going to talk about this
20 statement in a few minutes.

21 This statement was taken sometime after
22 Mr. Bostock was fired; right? It was a little more
23 than a year later.

24 A. I believe so.

25 Q. Right. He was fired -- to your recollection,

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1 he was fired in 2013?

2 A. '13, correct.

3 Q. All right.

4 A. I believe so, yes.

5 Q. Okay. Now, if I told you that he was fired on
6 June 3rd, 2013, does that sound about right for you?

7 A. It does.

8 Q. And not terribly long after that you resigned
9 from your board chair position; is that right?

10 A. Correct.

11 Q. And the fact of his firing in a meeting
12 that -- with Judge Teske that took place at or about
13 the time of his fire, those were sort of the -- some
14 of the events that caused you to decide to resign; is
15 that right?

16 A. Correct.

17 MR. HILL: Object to form.

18 BY MR. BUCKLEY:

19 Q. All right. Let's go ahead. Let me tell you,
20 he may object to the form of some of my questions, and
21 that's fine. He's making a record. And when he does,
22 you're welcome to go ahead and respond to the question
23 if you understand it; and, of course, if you don't,
24 say so, I'll rephrase it, okay?

25 A. I can address the reason for resigning. There

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1 were a multitude of reasons --

2 Q. Right.

3 A. -- that made me.

4 Q. Okay. Go ahead.

5 A. One was I had served on the board for a long
6 time, and we had made attempts to try to find another
7 board chair, and could not find another board chair,
8 and I was ready to step down as the board chair, but
9 continue to serve on the board. And we really
10 struggled with trying to find a board chair.

11 Q. Okay.

12 A. And so I just continued to remain as the board
13 chair and went along year after year. But after --
14 after I was approached about Gerald's firing, after I
15 was approached and told that the board would be
16 questioned by the media, it was very disheartening to
17 me to know that we would -- or we had worked so long
18 to build the Friends of Clayton County CASA board to
19 where it was, and the negative exposure of the media I
20 did not agree with.

21 I did not feel like -- for, one, it was the
22 board who had control over these funds that were being
23 allegedly misused, and, therefore, the board should
24 not have been involved.

25 Q. Mm-hmm (affirmative).

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1 A. I think the board -- it was okay for the board
2 to know what was going on, and we certainly should
3 know what's going on because we were -- we were there
4 to support the program. So if there was an issue with
5 the program, then it was absolutely okay for us to be
6 abreast to what was going on. It was not okay to be
7 pulled through the media, in my opinion.

8 Q. Okay.

9 A. And then -- so that was the first thing that
10 really disturbed me. And then the fact that it was --
11 a board meeting was requested without my knowledge to
12 explain what was going on, I felt was inappropriate.
13 That was not protocol. A board chair and a co-chair
14 are the two with the authority to call a special board
15 meeting, not a staff member of the court.

16 Q. Right.

17 A. And so I addressed that situation and
18 requested that the board meeting be cancelled, and
19 that I would be happy to call a special board meeting,
20 which we later did.

21 But that did not set well with the judge. And
22 so there were a few heated conversations, or I
23 shouldn't say -- there was a heated conversation with
24 a few words that I did not appreciate. And from my
25 perspective, I'm approached to serve on many

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1 non-profits. I can choose where I put my money and my
2 time, and I did not want to continue to serve and
3 donate my time and money to an organization that was
4 going to do that.

5 Q. Okay.

6 A. And, therefore, I resigned.

7 Q. Okay. So you said a lot. And we'll break
8 down a little bit --

9 A. Okay.

10 Q. -- of it at a time.

11 A. Okay.

12 Q. Who is Judge Teske?

13 A. He's the juvenile -- juvenile court judge for
14 Clayton County.

15 Q. Is there only one juvenile court judge?

16 A. No.

17 Q. How many are there?

18 A. I'd only be guessing if I told you four or
19 five.

20 Q. Was he at the time the chief juvenile court
21 judge?

22 A. I believe so. I believe sometime during my
23 time Judge Banke, I believe if I have got it right,
24 might have been the presiding, and then sometime after
25 Judge Teske. But, again, I can't swear to that.

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1 Q. Okay.

2 A. I was in Judge Teske's courtroom or Banke's
3 courtroom the majority of the time --

4 Q. Okay.

5 A. -- between when I was a CASA.

6 Q. In talking about CASA funds and Gerald
7 Bostock, did he submit any sort of a report or summary
8 concerning the funds or the bank account to the
9 Friends of Clayton County CASA board on a periodic
10 basis?

11 A. To the board, I'm not real sure if I remember
12 distinctly a document. It was discussed, the GAL
13 funds, how they were spent during our board meetings.

14 Q. Okay.

15 A. I do not recall if there was actually
16 paperwork that was given to --

17 Q. Okay.

18 A. -- the board. I found out about the bank
19 statements, and how the procedure worked afterwards.

20 Q. Okay.

21 A. Because I was told by a staff member how it
22 worked.

23 Q. Mm-hmm (affirmative).

24 A. I cannot recall that during those eight years
25 if we talked about the procedure or anything during

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1 our board meeting.

2 Q. Okay.

3 A. I can't recall.

4 Q. Okay. In any event, June of 2013 you were
5 still chair of the board?

6 A. Correct.

7 Q. And on a -- on an afternoon in June, Judge
8 Teske called you up and asked if he could meet you at
9 the dealership, at your dealership; is that right?

10 A. Him or Colin one called, yes, and asked to
11 come in.

12 Q. Him, or?

13 A. It was either Judge Teske, or -- I don't
14 remember who made the call.

15 Q. Okay.

16 A. But it was a request to meet me at the
17 dealership. And Judge Teske and Colin Slay were the
18 two in attendance.

19 Q. Who is Colin Slay?

20 A. His exact position I don't know, but it's -- I
21 mean, he works for the juvenile court as well.

22 Q. Okay.

23 A. I don't know his title.

24 Q. And did he say why he wanted to meet with you?

25 A. Not over the phone.

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1 Q. Okay. But you agreed to the meeting?

2 A. Yes.

3 Q. Okay. So did Judge Teske and Mr. Slay come
4 over?

5 A. Yes.

6 Q. What is Judge Teske's first name?

7 A. Steven.

8 Q. Steven. All right. So they came over, and
9 where did -- did they meet you inside in your
10 dealership?

11 A. Yes, in my office on the showroom floor.

12 Q. Okay. And so what did -- so they come in, and
13 I guess you shook hands with them, and they sat down?

14 A. Yes.

15 Q. Okay. And then what transpired?

16 A. Judge Teske did the majority of the talking.
17 He let me know that Gerald was being terminated, that
18 I may be contacted by the media, and that the -- they
19 were in the process of changing the locks so that
20 Gerald could no longer have access to the office.

21 Q. Did he tell you that Gerald had stolen between
22 \$14,000 and \$17,000?

23 A. Yes, or misused. Misused or stolen. It was
24 a -- I later found out it was a combination. It was
25 later told that there was also some cash missing. But

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1 misused.

2 Because I kept asking are -- I was in shock --
3 are you absolutely sure, this -- it was such a
4 surprise and shock to me that we would even be having
5 this conversation.

6 Q. Right.

7 A. And so I asked repeatedly if did he have
8 proof, and was he sure, and how is -- how did that
9 happen, and --

10 Q. Okay. And what did he say?

11 A. Yes, he had proof.

12 Q. Okay. And -- and did he -- did he say
13 something accusatory such that the board knew he was
14 spending money, or spending it illicitly, something
15 along those lines?

16 A. So in the beginning when -- when he told me
17 that I would be contacted by the media, I asked why.

18 Q. Yeah.

19 A. And he said, Well, it's because we were aware
20 that there was a misuse of funds.

21 And I said, I do not know anything about a
22 misuse of funds. We were not privy to those funds.

23 Q. Mm-hmm (affirmative).

24 A. That was not monies that the board approved,
25 or had in our possession. It did not go in our bank

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1 account. I don't know why the board would be
2 interviewed, or I would be interviewed, because I
3 couldn't -- I couldn't provide any information in
4 relation to if the -- the funds were misused. It was
5 in the teens, 14 to 17 grand, and he had proof.

6 Q. Okay.

7 A. And I kept saying are you sure. Because I
8 mean, at this point, to be honest with you, I mean, I
9 was in shock.

10 Q. Right.

11 A. I couldn't believe that that could be true.

12 Q. Okay.

13 A. And he reiterated that they had proof.

14 Q. Did he say what his proof was?

15 A. I don't know if it was that day or another day
16 with a conversation with John Johnson, but the bank
17 statements come up, that there was -- there was proof
18 by looking at the bank statements.

19 Q. You ultimately reviewed those statements,
20 didn't you?

21 A. I did review those statements.

22 Q. Did you find evidence of a misuse of funds
23 when you reviewed those statements?

24 A. None.

25 Q. Was that after Gerald had been fired?

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1 A. Yes.

2 Q. Okay. Let's go back to this conversation for
3 a few minutes.

4 Did he reference Gerald's expenditure of the
5 funds at a gay bar?

6 A. Yes.

7 Q. Tell -- tell me to your best recollection
8 exactly what he said and how he said it.

9 A. So because of my shock and disbelief, I kept
10 saying to both of them, Are you sure? Like, how could
11 this happen? How do you know? I mean, Gerald has
12 been with the program a long time. I would have never
13 suspected.

14 So in my questioning because I just, you know,
15 not that it was my duty or my right, but I just could
16 not believe that this could be the case. And so I
17 would ask: Are you sure? Like, how do you know? I
18 mean, is this -- you have proof before you're just
19 going right out and firing him, and now you're going
20 to the, or talking to the media?

21 I mean, this is going to be not favorable for
22 the Friends of Clayton County CASA board. And we had
23 nothing to do with that, if it did take place, and
24 I -- I just don't agree with the fact that you're
25 going to let the media get a hold of this, and be

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1 willing to talk to them when are you sure. Like, in
2 my mind I just couldn't believe it was true. So I
3 kept asking that.

4 And I guess because of me pushing for answers,
5 and kept saying are you sure, I just cannot believe
6 that this is -- this could be true, he said -- he
7 started stating, Well, he spent money here, and at
8 this place.

9 And I said, But isn't that what the funds were
10 for? Like, I'm still in shock. I don't understand
11 why you're saying it was misuse of money. That's what
12 I understood the money to be for.

13 And so because I kept questioning it, and --
14 and I don't know if I agitated him. I don't know if
15 he felt like I didn't have the right to be questioning
16 him, but I kept saying over and over I just can't
17 believe that this can be true, and you're just going
18 to fire him, and you're going to talk to the media,
19 and now you're pulling the board into it? Are you
20 sure?

21 And he said (indicating hand motion) it was
22 at -- he slammed his hand down on my desk (indicating
23 hand motion) and said, "But it was at a gay bar."

24 And I said, You knew he was gay. I mean, that
25 wasn't hidden. I don't -- what does that have to do

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1 with it? And he said he didn't have a right to be
2 using those funds, and. I said, Okay, I mean --

3 Q. He also referenced the softball team, didn't
4 he?

5 A. He did state that the softball team was -- the
6 sponsorship was covered by the GAL money, or it was --
7 I don't know if "covered" is the right word, but there
8 was money used for the softball team, and was I aware.

9 And I said yes, I was.

10 And he said, Why would you do that?

11 I said, Well, we don't approve that --

12 Q. Right.

13 A. -- we were just aware. And I don't disagree
14 with it. I don't recall anybody on my board thinking
15 that that was a bad idea.

16 Q. Mm-hmm (affirmative).

17 A. Not that it was our authority to -- to state
18 if it was --

19 Q. Mm-hmm (affirmative).

20 A. -- misuse of funds. But the money wasn't the
21 Friends of Clayton County CASA board money.

22 To our understanding, GAL funds were used for
23 recruitment of volunteers, and if you're re- -- and to
24 recruit Duck Derby sales, and if you're doing that,
25 then I don't think anybody, including myself, on the

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1 board thought that this was -- there was a problem
2 with that.

3 So for him to have said the softball team, or
4 brought up the softball team, and it was, you know,
5 Gerald had made the decision to sponsor the softball
6 team, and was I aware. I said I was, and we didn't
7 see anything wrong with it, although it wasn't our
8 approval.

9 Q. And he referenced it as a gay softball team
10 when he told you that, didn't he?

11 A. I know the "gay bar" comment was, I'm
12 100 percent. I cannot be 100 percent if he referred
13 to the softball team as being gay.

14 Q. Okay.

15 A. But I do remember - I could go back and look
16 at what I wrote in 2015.

17 Q. Okay.

18 A. I cannot swear to it today.

19 Q. All right.

20 A. But I can tell you that he said that about the
21 gay bar.

22 Q. And when he did it, he slammed his hand down
23 on your desk; right?

24 A. And said, "But it was at a gay bar."

25 Q. And you showed the jury how he did it, and

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1 what he said when he did it?

2 A. (Indicating hand motion.) "But it was at a gay
3 bar".

4 Q. Okay. All right. Now, you have been at CASA
5 events before with Judge Teske and Gerald; correct?

6 A. Yes.

7 Q. And you have been in -- at CASA events that
8 were fundraising, or perhaps events to reward
9 volunteers with Judge Teske, and with Gerald Bostock
10 here; right?

11 A. Yes.

12 Q. And some of those events were in bars; right,
13 or places that --

14 A. Restaurants that have bars.

15 Q. Okay. Restaurants that serve alcohol. And in
16 those events alcohol was purchased; right?

17 A. So the event did have alcohol.

18 Q. Mm-hmm (affirmative).

19 A. The volunteers, board and staff were told that
20 we have a sponsorship for -- to cover food costs, that
21 alcohol would -- should be purchased by the
22 individual.

23 So at both Carrabba's and Chili's I believe
24 might be the only two places we went over that period
25 of time. The food was a sponsorship, and the alcohol

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1 was up to the individual to pay for.

2 Q. Okay. Did you ever see Teske tell Gerald he
3 should pick up the tab for alcohol at any of these
4 events?

5 A. Yes. There were a few times that people would
6 walk out and forget. Maybe they didn't realize, or
7 just out of habit felt like that the whole event was
8 sponsored by either Carrabba's or Chili's.

9 Q. Okay.

10 A. And we would have a situation where at the end
11 of the event the waitress would come over and say,
12 well, we have some people that have left that did not
13 pay for the alcohol. And, yes, the -- it was picked
14 up by a debit card from the court system --

15 Q. Okay. Did --

16 A. -- which, I assume, was the GAL funds.

17 Q. And Teske told Gerald to go ahead and do that;
18 right?

19 A. Yes.

20 Q. And when he (indicating) slammed his hand down
21 on the -- on your desk, and said it was at a gay bar,
22 did he reference that it was a restaurant or bar
23 called Frogs?

24 A. I think that Frogs was mentioned.

25 Q. Okay.

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1 A. I'm not going to swear to that.

2 Q. All right.

3 A. Because I know that I saw that on the receipt
4 at the bank statement -- on the bank statement, but I
5 can't swear if he named the bar.

6 Q. Okay.

7 A. He did say it was at a gay bar, but I'm not
8 going to swear that he said Frogs.

9 Q. All right. Now, when Teske was instructing
10 Gerald to pick up the bar tab, was he telling him to
11 pick it up using CASA funds?

12 A. It wasn't -- not the Friends of Clayton County
13 CASA funds.

14 Q. Okay.

15 A. But it would have been CASA funds.

16 Q. CASA funds.

17 A. Whether it came out of the GAL account, or
18 what account it come out of --

19 Q. Okay.

20 A. -- I would not know that.

21 Q. All right.

22 A. And I believe even there was a time that the
23 Friends of Clayton County CASA had to pick up the tab.

24 Q. Okay.

25 A. Because this happened over years.

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1 Q. Right.

2 A. So I think that there was probably a time or
3 two that somebody walked out and didn't pay, and we
4 would have to pick up the tab.

5 Q. Now, Gerald was authorized to spend money for
6 recruiting, to your knowledge; correct?

7 A. Yes.

8 Q. Okay. And there is a Memorandum of
9 Understanding between the Superior Court State of
10 Georgia for Clayton County and Clayton County CASA;
11 right? Are you familiar with that document?

12 A. Yes.

13 MR. BUCKLEY: Okay. And I am going to
14 need you to get -- no, I don't. This will be
15 Exhibit 3?

16 REPORTER: 3, yes, sir.

17 (Plaintiff's Exhibit [P-3](#) marked.)

18 BY MR. BUCKLEY:

19 Q. Showing you what's marked as Exhibit 3. And
20 ask you if you can identify that document.

21 A. It states that it's a Memorandum of
22 Understanding between the Superior Court of the State
23 of Georgia for Clayton County and the Clayton County
24 CASA.

25 Q. Okay. So did you ask Judge Teske -- now, I

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1 mean, people get fired, and people get fired by
2 Clayton County, I assume, and not every event is a
3 media event. Did he tell you -- he told you that the
4 press was going to be contacting you, and did he tell
5 you how it was that the press had been alerted to this
6 matter?

7 A. He did not.

8 Q. Did he tell you that he was the person who
9 alerted the press?

10 A. He did not.

11 Q. Were you aware that he alerted Richard Belcher
12 to come down and -- when Gerald got fired?

13 MR. HILL: Objection, assumes facts not
14 in evidence.

15 BY MR. BUCKLEY:

16 Q. Well, if you're aware; if you're not, you're
17 not.

18 A. I was -- I was told, I do not remember by who,
19 that it was common knowledge that Judge Teske had
20 approached Belcher. I do not know that firsthand.

21 Q. Okay.

22 A. And Judge Teske did not tell me that.

23 Q. Did you see it on the news after that?

24 A. I did see it on the news.

25 Q. And what did it say? What do you recall of

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1 that newscast?

2 A. I remember Judge Teske being interviewed. I
3 believe he was sitting at his desk when he was
4 interviewed, and he stated that there was a misuse of
5 funds by Gerald Bostock of Clayton County CASA. And
6 what scrolled on and off between showing Judge Teske's
7 interview was pictures of the Friends of Clayton
8 County CASA board.

9 Q. Mm-hmm (affirmative). In a meeting, or
10 something?

11 A. So it was, I'm assuming, taken off of our
12 website --

13 Q. I see.

14 A. -- or.

15 Q. Right.

16 A. I believe that was the only way they would
17 have had access to pictures. But it was pictures of
18 the board from Clayton County CASA.

19 Q. Now, was it at this meeting or after this
20 meeting that Steve Teske told you that he wanted to
21 call a special board meeting of the Friends of Clayton
22 County CASA?

23 A. It was after this meeting.

24 Q. Okay. Did he call you on the phone or what?

25 A. No, I don't believe so. I believe that

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1 someone else let me know that he had requested for our
2 board to meet.

3 Q. Okay. All right.

4 A. And it was a quick turnaround, and I was
5 unavailable.

6 Q. Okay. Before we get to that let me go back to
7 the t-shirt thing. He did mention that Gerald had
8 used funds to put the Clayton County CASA logo or
9 something on the T-shirt for his softball team.

10 A. He did talk about the softball team.

11 Q. Okay. Do you remember when you and I talked
12 on the phone a couple of months ago?

13 A. Yes.

14 Q. All right. And do you remember at that time
15 that when he was talking about him taking out people
16 to a gay bar that he mentioned that he bought t-shirts
17 for a gay softball team?

18 A. I can't swear if he said gay softball team.

19 Q. Okay.

20 A. I know he said gay bar. I'm 100 percent sure.

21 Q. All right. But he was irate about the name of
22 the organization being paid -- money being paid for it
23 to be on a t-shirt for this, his softball team?

24 A. That was part of what the court had disagreed
25 with, is that Gerald had used the funds,

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1 misappropriated the funds, by sponsoring the softball
2 team and misusing the funds by the way of how he spent
3 them taking people out.

4 Q. Okay.

5 A. And it was -- it was mentioned with
6 100 percent certainty that it was at a gay bar.

7 Q. All right.

8 A. That, I 100 percent remember.

9 Q. Emphatically, the way you described it, with
10 his hand being slammed down on your desk?

11 A. Yes. Now, in honesty, he may have been
12 aggravated that I was questioning him --

13 Q. Right.

14 A. -- because I continued to question "are you
15 sure?"

16 Q. Mm-hmm (affirmative).

17 A. So reiterating to me the reasoning and trying
18 to prove that Gerald had misused the funds --

19 Q. Right.

20 A. -- is when he stated it was a gay bar.

21 Q. So let's go to the special board meeting that
22 he tried to call.

23 A. Okay.

24 Q. He got in touch with you to say he wanted to
25 call a special board meeting; right?

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1 A. I don't remember if he was the one that said
2 it, or if someone called me and said --

3 Q. Okay.

4 A. -- that there was a board meeting being
5 scheduled by Judge Teske for our board.

6 Q. Now, was Judge Teske authorized to call a
7 special board meeting of the Friends of Clayton County
8 CASA?

9 A. No.

10 Q. And did you explain that to whomever told you
11 that?

12 A. Yes.

13 Q. Did Judge Teske make any threats to you when
14 you refused to allow him to call that meeting?

15 A. Yes.

16 Q. What did he -- was this on the phone, or in
17 person?

18 A. Phone.

19 Q. What did -- what happened there? Tell me
20 about the substance of that conversation.

21 A. So Debbie Stinson, which was a staff member
22 that worked under Judge Teske, had called me, and it
23 was to talk about having a board meeting.

24 And I stated that I was happy to have a board
25 meeting. I was happy to let Judge Teske come in and

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1 talk to the board about -- and explain directly from
2 himself why Gerald was terminated, but it was not
3 going to be done on that next week, that I was out of
4 town, and that I felt like it was necessary for the
5 board chair to be there. And that I would schedule
6 it, but it would not be next week.

7 Q. Mm-hmm (affirmative).

8 A. And he was not happy about that decision, and
9 stated: You're either for me or you're against me,
10 but it would not be in your best interest to be
11 against me.

12 Q. Okay.

13 A. And so we had conversation back and forth
14 about how that was just not protocol, and that Judge
15 Teske couldn't call a board meeting; not that I was
16 against it. I didn't have a problem with him doing
17 so. But it would not be done the day he wanted, and
18 as quickly of a turnaround as he wanted. And that I
19 could call one and let him know, and that I would even
20 work with his schedule.

21 And he said, Well, let me make sure you
22 understand, if you're against -- that is not in your
23 best interest to be against me. You'll -- you will
24 have a federal investigation against you and that
25 dealership, and the IRS will be notified about you

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1 taking a deduction on the -- on the car you donated.

2 And I said, Whoa, whoa, whoa. Wait a minute.

3 First of all, do not talk to me that way. Don't
4 threaten me. I have done nothing but supported
5 Clayton County CASA for the eight, ten years I've been
6 involved. You have no idea about our financial
7 records and how we classified our donations. And I
8 don't work for you, and you may talk to your employees
9 like this, but you will not talk to me this way.

10 And Debbie Stinson, because it was on speaker
11 phone said, Whoa, whoa, wait, y'all, come on now, it's
12 getting a little heated. Let's just stop the
13 conversation. Let's just agree to have the board
14 meeting and we'll just move on from there.

15 Q. Remind me who Debbie Stinson is.

16 A. She works for the court. She works for
17 juvenile court. I don't know her exact position.

18 Q. Okay. So go on, tell the rest of the
19 conversation. She says whoa, whoa, whoa.

20 A. Whoa, whoa, whoa, I think this is getting out
21 of hand. Let's just end this call.

22 And Judge was either in her office or she in
23 his. And I agreed to call a board meeting and let him
24 know when the board meeting was, and we ended the
25 conversation.

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1 Q. Okay. So you -- did you tell anybody about
2 this conversation at your dealership with Teske where
3 he slammed his hand down on your desk and emphasized
4 that monies were being spent at a gay bar?

5 A. I believe I actually had that conversation
6 with Gerald.

7 Q. Okay.

8 A. I can't swear to it, but I believe I did tell
9 him.

10 Q. Did you talk to Jane Glaze --

11 A. Yes.

12 Q. -- or Sandra Henderson?

13 A. Yeah. Both of them are on my board.

14 Q. You told them about it?

15 A. I believe.

16 Q. Okay.

17 A. I mean, it's a long time ago. I don't
18 remember.

19 Q. Jane Glaze and Sandra Henderson, they're both
20 board.

21 Okay. So, when did you -- did you ask for the
22 bank statements? How did you get the bank statements
23 so you could go through them?

24 A. I did talk to a staff member about the bank
25 statements.

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1 Q. Staff member at the court?

2 A. Correct. Requel, I believe that was her name.
3 I tried to think back to who it was I had talked to
4 and I believe it was Requel. Again, that was a long
5 time ago.

6 And she stated that John Johnson had been
7 getting copies of the bank statement with notes
8 written by Gerald as to who he would have taken to
9 lunch or to dinner or to breakfast.

10 Q. Mm-hmm (affirmative).

11 A. The bank statements, as you know, that when
12 you use a debit card, it will say where, location,
13 who, Applebee's, Chili's, Chick-fil-A, whatever.

14 Q. Right.

15 A. And so beside it she stated it would state who
16 he attended, or who he went with.

17 Q. Mm-hmm (affirmative).

18 A. And she said: I would always give copies to
19 John Johnson at the end of each month.

20 Q. Mm-hmm (affirmative).

21 A. Again, our board wasn't privy to that
22 information.

23 And I requested from Heritage Bank to get
24 copies of the bank statements because I wanted to see
25 what was being accused of, and now you're bringing, or

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1 trying to bring our board into it, and I just, again,
2 couldn't believe that this was going on.

3 And so I asked someone at Heritage Bank could
4 I have copies of the bank statements. And I was
5 provided those copies.

6 Q. You said numerous times in this deposition
7 when you were told that Gerald had misappropriated
8 funds you couldn't believe it. You've said that over
9 and over here.

10 What was your experience in terms of Gerald
11 Bostock, working relationship? Did you get an
12 opportunity to -- to learn about his truthfulness and,
13 you know, was he in your mind and in your observation
14 a truthful person?

15 A. Yes.

16 Q. Did you ever have occasion to believe that
17 Gerald lied to you or your board?

18 A. No.

19 Q. Okay. And then so you went ahead -- who is,
20 by the way, Requel Stoutamire?

21 A. Yeah, she's a staff member.

22 Q. Okay. What was your dealing with -- a staff
23 member to the court?

24 A. Yes.

25 Q. What was your dealing with her? Was she on

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1 any calls or anything concerning this?

2 A. I do not believe she -- I cannot swear who was
3 in the room with --

4 Q. Okay.

5 A. -- Debbie and Judge Teske because I was on a
6 conference call. The only people that spoke were
7 Debbie and Judge Teske.

8 Q. Okay.

9 A. If anyone else was in the room, I'm not aware.
10 Requel may have attended a board meeting. Sometimes
11 staff members of CASA would attend our board meetings.

12 Q. Okay.

13 A. I can't swear if she was at a board meeting.
14 I remember -- I believe I remember speaking to her
15 about the issue, and she is the one that stated --

16 Q. Okay.

17 A. -- the bank statements got written on by
18 Gerald. I cannot swear that it was her.

19 Q. Okay.

20 A. I was not close with staff.

21 Q. Mm-hmm (affirmative).

22 A. I don't know them --

23 Q. Closely?

24 A. -- real well.

25 Q. Right.

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1 A. I would work with them at events when we would
2 go to events to try to promote CASA. But I -- I, you
3 know, we've had, you know, events in the county where
4 we would have a booth and we would try to promote
5 CASA, and sometimes staff was there, sometimes they
6 weren't. So I would, you know, be able to talk to
7 them or get to know them a little bit. But I did not
8 work as closely with staff members as I did -- I did
9 Gerald.

10 Q. Okay. So I want to go back to you. So you
11 personally went through these bank statements?

12 A. Correct.

13 Q. What was the approximate time frame that you
14 looked through this material?

15 A. Three years' worth.

16 Q. And your background is in bookkeeping and
17 accounting?

18 A. Correct.

19 Q. And so you looked at these bank statements
20 with a trained eye, so to speak?

21 A. Correct.

22 Q. Did you find any misspending of funds or
23 wrongdoing on Gerald's part?

24 A. All the debit card withdrawals, to me,
25 supported the Memorandum of Understanding that it was

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1 to help recruit volunteers --

2 Q. Okay.

3 A. -- to spread the word and advocate for Clayton
4 County CASA. And it aligned with the Memorandum of
5 Understanding, based on what I -- how I interpreted
6 the Memorandum of Understanding.

7 Q. And if he recruited or advocated for CASA at a
8 gay bar, for example, that would be within the four
9 corners of the memorandum -- the authorization of the
10 Memorandum of Understanding; correct?

11 A. In my mind that doesn't tell you to --

12 Q. Okay.

13 A. -- pick one group of people. It just -- it's
14 for advocating and recruitment of volunteers.

15 I don't think anywhere that I have ever seen
16 it told you that it should be male, female or what
17 your sexual orientation is, has nothing to do with
18 being a volunteer for CASA.

19 Q. Okay. So did you inform the board of your
20 investigation concerning your review of the bank
21 accounts?

22 A. By the time I got the bank statements, I
23 believe I had resigned from the board at this point.

24 Q. Okay.

25 A. I do remember having conversation with a

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1 couple of board members about the issue, and I do
2 remember the end conversation when I brought up the
3 fact that there was no evidence, from what I saw --

4 Q. Mm-hmm (affirmative).

5 A. -- that one of the board members mentioned
6 that she was told cash was missing. So, obviously, if
7 you're looking at a bank statement you're not going to
8 know that the deposit is not there. There is nothing
9 to see.

10 Q. Mm-hmm (affirmative).

11 A. But I have no proof of that.

12 Q. Okay.

13 A. And, again, you know how rumors and people
14 talk, so.

15 Q. Right.

16 A. That was nothing that I could --

17 Q. Okay.

18 A. -- I can state whether I know it's factual or
19 not.

20 Q. So she told you somebody had told her that?

21 A. That it also had to do -- it was more than
22 just the bank statement --

23 Q. Right.

24 A. -- that I was looking at, that it was also
25 cash.

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1 Q. Basically, she was kind of telling you hearsay
2 upon hearsay; right?

3 A. Hearsay, yes. You know how that happens --

4 Q. Right.

5 A. -- rumors and people start talking.

6 MR. HILL: Object to the form.

7 BY MR. BUCKLEY:

8 Q. Right. Okay. Great.

9 A. I don't have proof. And if you're asking me
10 if I saw that on a bank statement, I would not have.

11 Q. Did she --

12 A. Because if it didn't get made, it's not going
13 to be there.

14 Q. And did she identify who told her that cash
15 was missing?

16 A. No, no.

17 Q. Okay. So.

18 A. She said that she had heard.

19 Q. She'd just heard. All right.

20 So did you have a conversation with John
21 Johnson about Gerald not long after Gerald was fired?

22 A. Yes.

23 Q. And, again, John Johnson is who for the record
24 here?

25 A. He -- I'm going to state that I believe it's

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1 director. I don't know his title actually. But he
2 works for the Clayton County CASA program.

3 Q. Do you know if he's the court administrator?

4 A. I believe that's his position.

5 Q. Okay. So tell me, tell me about that
6 conversation.

7 A. So after the board meeting that Judge Teske
8 had requested, we -- John Johnson and I walked outside
9 of the court building, were standing in the lawn of
10 the parking lot, and just very nonchalant he said:

11 Well, we've been knowing that Gerald was
12 misrepresenting funds for a few years now. And, you
13 know, kind of implying that they finally got him.

14 And I cut him off. I said, Whoa, whoa, whoa,
15 wait a minute. You knew it was going on that he was
16 spending money he shouldn't have been spending, and
17 you let it keep going on? I said, Well, that's your
18 fault. If I had an employee at the dealership that
19 turned in a bank statement, or turned in a check
20 request and it was not an approved expense, I would
21 have sat that employee down and said that's not how
22 you spend our money.

23 I can't understand how you could make that
24 comment that you knew it was going on but didn't do
25 anything. The first time you saw it was a misuse of

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1 funds, you should have sat him down and told him this
2 is not how we want you to use funds.

3 So we -- that quickly ended the conversation
4 because --

5 Q. Did he have any reply to that, when you told
6 him this is how you should have done it?

7 A. I don't remember.

8 Q. Okay.

9 A. It wasn't -- it wasn't a long conversation
10 after that.

11 Q. Okay. All right. Did -- and Johnson, I take
12 it, he was not specific about what the misuse was,
13 the --

14 A. No.

15 Q. Okay.

16 A. It was a very short conversation.

17 Q. Okay. Did Johnson ever make any, any mention
18 of Gerald being gay?

19 A. No.

20 Q. Okay. All right. I am probably close to
21 being done, Ms. Crawford, to your delight, I am sure.
22 But if you will give me a few minutes, so I can --

23 A. Okay.

24 Q. -- talk with my folks.

25 A. Would you like me to step out?

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1 MR. BUCKLEY: Actually, we'll step out.

2 THE VIDEOGRAPHER: Going off the video
3 record at 11:21.

4 (Recess 11:21 a.m. - 11:34 a.m.)

5 THE VIDEOGRAPHER: We're now back on the
6 video record at 11:34. This is the start of
7 video file number two.

8 BY MR. BUCKLEY:

9 Q. Jane Glaze was the treasurer for Clayton,
10 Friends of Clayton County CASA; is that right?

11 A. Yes.

12 Q. And do you recall that there was a period of
13 time when, if Gerald needed to do an event, an event
14 to recruit volunteers, or donors, or fundraise or
15 whatever the case may be, that he would actually have
16 to pay the tab out of his own pocket and then seek
17 reimbursement from her?

18 A. I believe so, yes.

19 Q. Okay.

20 A. I believe that's taken place.

21 Q. Do you recall, if you do, that Ms. Glaze at a
22 certain point said that that was really something she
23 couldn't just keep doing, and that it would be better
24 to give him access to some account with a debit card
25 or something along those lines?

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1 A. I believe so. When we were doing Duck Derby,
2 you know, supplies and things like that --

3 Q. Yeah.

4 A. -- that, yes, I believe we had done that. I
5 don't remember for how long of a period of time, but I
6 do recall that.

7 Q. Okay.

8 A. That we -- Gerald was able to buy whatever
9 necessarily -- necessary supplies and things that we
10 might need --

11 Q. Okay.

12 A. -- to recruit volunteers --

13 Q. Okay.

14 A. -- or to buy supplies. We would have to buy
15 sometimes wood and plastic and containers or --

16 Q. Okay.

17 A. -- you know, things to -- tents or tables or
18 things. And he would help with that, getting stuff
19 like that.

20 Q. Okay.

21 A. Primarily the board was typically mainly
22 women, and so sometimes it was also hard for us to
23 pick up supplies and things like that. So I can
24 recall Gerald doing that.

25 Q. Okay. And in some of these events,

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1 fundraising events, recruiting events, things of that
2 nature, you attended probably a number of them over
3 the years; right?

4 A. Correct.

5 Q. And there were any number of these occasions,
6 separate and apart from food that alcohol was served,
7 or somebody might be given a glass of wine or
8 something along those lines, that would be picked up
9 with Clayton County CASA funds?

10 A. Yes.

11 Q. Okay. And that was not prohibited, or
12 unusual, was it?

13 A. No. I mean, the majority of our funds were we
14 sat around the bar at Chili's, as an example, and had
15 drinks, and it was appetizers. So it was not uncommon
16 for us to --

17 Q. Okay.

18 A. -- stand a round, everybody, for the most
19 part, having a drink and eating appetizers and
20 socializing.

21 Q. Okay. And Teske was at any number of those
22 events, correct, that you were at?

23 A. He was at some of the events, yes.

24 Q. Okay. And he saw alcohol being served?

25 A. Yes.

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1 Q. He may have even imbibed himself; right?

2 A. Yes, he did.

3 Q. Okay. And -- and he knew that those events
4 were being paid for with Friends of Clayton County
5 CASA funds; right?

6 A. And -- and sponsorships.

7 Q. And sponsorships?

8 A. The combination of, yes.

9 Q. Okay. So -- so did it strike you unusual when
10 he slammed his hand down on the table (indicating hand
11 motion) and said he took people to the gay bar?

12 A. I -- I was shocked by that.

13 Q. Okay.

14 A. Because it was not hidden that Gerald's choice
15 of partner was a -- a male, and -- and so everybody
16 knew that. And so for him to have been bothered by
17 that was a shock to me because I was never around him
18 where I felt like he was bothered by that.

19 Q. All right.

20 A. So --

21 Q. All right.

22 A. -- that's my reply was: "And?" I mean.

23 Q. Yeah. And you do recall him in that same
24 meeting in your office mentioning that he had used
25 funds to sponsor his softball team. You just don't

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1 specifically remember as you sit here under oath
2 whether he said gay softball team; is that right?

3 A. I cannot swear if he said "gay softball team."
4 I could go back and read my notes back when I was
5 requested back in 2015 to see if I had said that.

6 Q. Okay.

7 A. I 100 percent remember him saying that it was
8 at a gay bar.

9 Q. Okay.

10 A. I'm 100 percent positive with that.

11 Q. Right.

12 A. He did mention the different items that Gerald
13 had spent the money on, one of which was the
14 sponsorship of a softball team.

15 Q. Right. Okay.

16 A. I cannot swear at this time without reading,
17 you know, back in 2015 what I wrote, if it was -- if
18 it was a gay softball team or not. I cannot swear to
19 that.

20 Q. Do you know if Mr. Teske knew that the
21 softball team was gay, a gay team, a gay mens' team?

22 A. I do not know.

23 Q. Okay. All right. So Requel Stoutamire, was
24 she the bookkeeper for the expenditure of CASA funds
25 at the courthouse?

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1 A. I believe that she had it as part of her
2 duties because she had access to the bank statements.

3 Q. All right.

4 A. But I don't remember her exact title.

5 Q. Now, this allegation that cash was missing.

6 A. Mm-hmm (affirmative).

7 Q. You have never seen any evidence or proof that
8 any cash was taken from CASA-related funds?

9 A. No, never.

10 Q. Okay. And --

11 A. And it was not uncommon to sell our duck
12 tickets with cash.

13 Q. Okay.

14 A. It was not uncommon because people would buy a
15 six-quack for \$25, and they would -- whether it's a
16 volunteer, or a board member, or a staff member, would
17 turn in that cash at our event --

18 Q. Okay.

19 A. -- so.

20 Q. All right. So through all this event and your
21 being told that he has somehow misappropriated funds,
22 to this day have you seen any evidence that Gerald
23 Bostock misappropriated any CASA-related funds?

24 A. No.

25 MR. BUCKLEY: Okay. That's all I have.

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1 MR. HILL: Is it fine if I remove my mask
2 for the --

3 MR. BUCKLEY: You go ahead.

4 MR. HILL: Thank you.

5 MR. BUCKLEY: Do whatever works.

6 MR. HILL: Thank you.

7 EXAMINATION

8 BY MR. HILL:

9 Q. Ms. Crawford?

10 A. Yes.

11 Q. I'm Michael Hill. I represent Clayton County.
12 And to follow up on what we were just talking about
13 with the conversation at your dealership with Judge
14 Teske and Colin Slay, the one at the moment where you
15 say that Judge Teske slammed his hand down and said
16 the money was spent at a gay bar.

17 A. Yes.

18 Q. All right. Okay. I think you testified
19 earlier, so correct me if I'm wrong, I think you
20 testified earlier that the emotion behind him
21 slamming -- Judge Teske slamming his hand down, may
22 have been in response to your questioning his proof or
23 his decision making; is that right?

24 A. I can't tell you exactly what would cause a
25 person to be frustrated or angry enough to slam the

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1 hand down on the desk. I was continuing to ask: Why?
2 Are you sure? And that's when he finally said it was
3 at a gay bar, and slammed his hand down (indicating
4 hand motion) on my desk when he described where the
5 location took place.

6 Why he was mad, or had that intensity to
7 describe it, I -- that's -- I can't.

8 Q. You don't know why he was -- why he was upset,
9 is that what you're saying?

10 A. Well, I continued to question was he sure,
11 what proof did he have.

12 Q. Mm-hmm (affirmative).

13 A. How do you -- how do you know he took funds?
14 I mean, what -- what -- what -- what proof? And
15 wasn't that what he was allowed to do?

16 And he said: "It was at a gay bar."

17 Q. Okay. You did not think that Judge Teske was
18 trying to tell you that he had some problem with gay
19 people, did you?

20 A. I didn't -- I mean, I don't know what he was
21 trying to tell me. I can't --

22 Q. Well, what did you think he was --

23 A. I can't determine -- I can't determine another
24 person's feelings.

25 Q. Mm-hmm (affirmative).

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1 A. He -- I stated to him after the fact that "you
2 knew he was gay, so what does that have to do with
3 it?"

4 Whether the issue with him was that it was
5 done there, or that I was pushing him, I don't know
6 the reason to his -- (indicating hand motion).

7 Q. Okay. Just to the best of your recollection.
8 I know that you don't know what was actually in Judge
9 Teske's mind.

10 A. Right.

11 Q. But I just want to know what did you think at
12 the time to the best that you can remember. I know it
13 was back in 2013. Did you think he was saying that he
14 had some problem with gay people?

15 A. I cannot swear to what I feel like he knew. I
16 do know he brought it up to me.

17 Q. Okay.

18 A. I do know that that was an issue for him, or
19 he would not be telling me that. But I also know that
20 Judge Teske was aware that Gerald was gay. So for --
21 that was part of my shock, like why is that an issue
22 because we all knew it, why would -- why do you care.
23 That was the conversation that was taking place.

24 Now, can I swear that he had a problem with
25 it? No, I can't -- I can't tell you whether he had a

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1 problem. I can only tell you what he said.

2 Q. How -- so at the time you were -- in 2013 you
3 were aware that Mr. Bostock identifies as gay;
4 correct?

5 A. Yeah.

6 Q. How did you know that?

7 A. When I first become a CASA, he introduced his
8 partner to me as his partner. And so that's really
9 the only -- there was really no conversation that ever
10 took place about it. It's just I know that I was
11 introduced to one of his partners as his partner.

12 Q. Do you remember who that partner was?

13 A. I believe his name was Mike or Michael. I
14 can't even swear to that, to be honest with you. I'm
15 horrible with names, so. But I believe, I believe
16 that's his name.

17 Q. Do you recall a last name?

18 A. No, I do not. And I -- and I do remember a
19 Keith Sweat as being a partner that I was introduced
20 to.

21 Q. Did you ever --

22 A. But I don't remember the other name for sure.

23 Q. Okay. Did you ever meet anyone named Paul
24 Holland?

25 A. Paul? I'm absolutely terrible with names, to

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1 be honest with you. It sounds familiar, yes.

2 Q. Okay. And was that a yes, you think you did?

3 A. The name sounds familiar. I'm the worst at
4 remembering names.

5 Q. Okay. But you testified that it was really no
6 secret among CASA, or in the juvenile court, that
7 Mr. Bostock was gay, was it?

8 A. I don't -- I don't believe that -- that people
9 were unaware. I think everyone knew. It just wasn't
10 really talked about.

11 Q. Okay. And his partners over the years have
12 frequently attended CASA events; is that correct?

13 A. They have assisted with -- as, you know,
14 volunteering their time with the Duck Derby, and
15 helping out with, you know, duck sales, or helping
16 with the event, putting the track together, things
17 like that. That's how --

18 Q. Okay.

19 A. That's how I met them.

20 Q. Okay. And at the time of that meeting in your
21 office in the dealership, you believe that Judge Teske
22 had known for several years that Mr. Bostock was gay;
23 correct?

24 A. Yes.

25 Q. And you also believe that Colin Slay and John

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1 Johnson at that same time had also known for many
2 years that Mr. Bostock was gay; right?

3 A. I -- I would assume so. We didn't discuss it.

4 Q. But that was your belief?

5 A. That was my belief.

6 Q. Okay.

7 A. I would -- I would think -- it was not hidden,
8 but it also wasn't pushed in our faces either. But it
9 was -- when someone introduces their partner, you're
10 then aware.

11 Q. Okay. And so when Judge Teske said, as you
12 testified, that monies were spent at a gay bar, the
13 fact that Mr. Bostock may have gone to gay bars, that
14 would not have been a surprise to you or Judge Teske
15 as far as you knew; correct?

16 A. I can't imagine why we would be surprised if
17 that's who you prefer to hang around, it would not be
18 uncommon to go there.

19 So that was part of my shock in trying to talk
20 to him when he was so adamant of the fact that he was
21 about to terminate Gerald.

22 I said, But you knew that. Why would we --
23 what was -- okay, so your point? You know, that was
24 more just the conversation, like, "and your point is?"

25 Q. But the fact that Mr. Bostock was using the

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1 GAL account check card to pay for drinks at gay bars
2 in Midtown Atlanta, couldn't that also be an
3 indication that he was using check card for personal
4 social outings?

5 MR. BUCKLEY: Object to the form of the
6 question. Assumes facts not in evidence.

7 A. When we sit in our board meetings and we try
8 to strategize on ways to bring funds into Clayton
9 County and to help our cause, it was not uncommon for
10 us to talk about what are some other ways.

11 We kind of beat the same organizations up year
12 after year. And to grow it and to continue to spread
13 the word about what we do and who we serve and why we
14 do what we do, it was not uncommon for us to try to
15 strategize and think of ways for us to bring in new
16 people. And that conversation did take place at our
17 board meeting, that his softball team was interested
18 in helping, and no one in our board meeting felt that
19 that was inappropriate, or didn't make sense to us.

20 Q. Okay. I'm not asking about the softball team
21 right now. Just I'm really just focusing on the
22 comment about money being spent at a gay bar, all
23 right?

24 A. Okay.

25 Q. And one possibility could be a recruiting

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1 event, could be recruiting volunteers; correct? Could
2 also be just going out to a bar --

3 A. Mm-hmm (affirmative).

4 Q. -- correct?

5 MR. BUCKLEY: Object to the form.

6 A. So what you're asking me -- tell -- what is
7 your question, and I'll answer it. How about that?

8 BY MR. HILL:

9 Q. My question is when Judge Teske -- let me
10 strike that and start over.

11 My question is that the mere fact that
12 Mr. Bostock spent money at a gay bar also could be an
13 indication that he was just going out to a bar and
14 using CASA funds to cover a bar tab that might not
15 have been a recruiting expense; correct?

16 A. I don't think that that's for me to determine,
17 if it should have been at a gay bar or not.

18 Now, I do recall when I spoke with Gerald and
19 he was telling me that he was terminated, he asked me
20 do you believe this to be true?

21 And I said, No, I do not.

22 Could you have got permission, or made sure
23 that your superiors were aware of exactly who you were
24 going to for funds, maybe. Maybe looking back on it
25 now it may have made sense to have asked the question,

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1 or -- or -- or advise or let them know.

2 But at that time I did not know how the
3 procedure for the bank statements were being done.

4 So I later found out he actually was advising
5 them and letting them know that was the procedure that
6 the court had been allowing for several years, which
7 is writing on the bank statements who you took out and
8 where you went.

9 Q. Okay. I'll ask it in a more simple way.

10 Would you agree that it's possible that
11 expenses at bars or restaurants in Midtown could have
12 been just social outings? Would you agree with me on
13 that?

14 A. I think if you go to a bar and you speak to
15 people, that is a social outing. That is what we do
16 to recruit and try to raise funds. It is a social
17 event. We -- we -- that's what we did.

18 Q. Right. I'm just saying is it possible that
19 they were just social events and had nothing to do
20 with recruiting volunteers, would you agree that's
21 possible?

22 A. It's possible. That is not what I thought
23 happened.

24 Q. Right.

25 A. But yes, it is possible.

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1 Q. And at least did you know the events that
2 Judge Teske was talking about when he just said money
3 was spent at a gay bar, did you know what bar he's
4 talking about?

5 A. I do know that the word or the place Frogs, I
6 found out about the name. I cannot swear when I heard
7 the name Frogs.

8 When he stated it, he said "at a gay bar."
9 Now, whether or not or not the word of the name of the
10 restaurant or bar was brought up, when, I can't
11 recall.

12 Q. So he said "a gay bar," like in the singular?

13 A. It was at a gay bar. It was a gay bar.

14 (Indicating hand motion.)

15 Q. So "a gay bar," so not more than one gay bar?

16 A. Not that I recall. It was at a gay bar --

17 Q. Okay.

18 A. -- was his word.

19 Q. Did he also say during that meeting that --

20 did he point out that the bars were in Midtown

21 Atlanta?

22 A. I don't remember exactly when that information
23 come available. So I can't swear that Judge Teske
24 actually stated that.

25 Q. Okay.

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1 A. I don't remember.

2 Q. Okay. But he might have said that during the
3 meeting?

4 A. He might have said that, yes.

5 Q. If it turned out that Mr. Bostock were going
6 out to bars and restaurants socially and then falsely
7 claiming that it was for recruiting volunteers, that
8 would be something inappropriate, would it not?

9 A. I do think so, yes.

10 Q. And that would be something that Judge Teske
11 would have a right to be concerned about; right?

12 A. I believe any time you're -- you're spending
13 money incorrectly your superiors should -- should be
14 worried about that, if that's what's taking place.

15 Q. Sitting here today, you don't know of any
16 individuals Mr. Bostock recruited from these Midtown
17 bars or restaurants to volunteer to be guardians ad
18 litem in Clayton County, do you?

19 A. Not specifically that I can remember.

20 Q. And to clarify one point, in a lot of your
21 testimony we talked about recruiting volunteers, there
22 are -- would it be fair to say that there is, roughly,
23 two types of volunteers: You can be a volunteer to be
24 a court-appointed special advocate, or a guardian ad
25 litem, and you could also volunteer to assist with the

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1 Duck Derby or one of the other fundraising events?

2 A. Yes, that's correct.

3 Q. Okay. And when -- just so this is clear for
4 the record, a "guardian ad litem" and a
5 "court-appointed special advocate," those terms mean
6 the same thing; correct?

7 A. Correct.

8 Q. Okay. So the meeting with Judge Teske and
9 Colin Slay at your dealership, do you recall what day
10 of the week this was?

11 A. I believe it was a Friday.

12 Q. Okay.

13 A. I believe.

14 Q. And was it the same day that whoever, Mr. Slay
15 or whoever, called you to set up the meeting?

16 A. No. I believe it was the day before -- I
17 can't -- you know what, strike that. Because I'm not
18 100 percent sure.

19 Q. Okay.

20 A. It was -- it quickly happened. So I don't
21 remember if they called me the day before in the
22 afternoon and said can we come in the morning, or if
23 they called and said can we come this morning. I
24 can't swear to that.

25 Q. Okay. Do you remember the time of day it was?

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1 A. It was morning -- the phone call, or the
2 meeting?

3 Q. Let's do both.

4 A. I don't remember the time of the phone call.

5 Q. Mm-hmm (affirmative).

6 A. But the meeting was the morning, probably
7 midmorning.

8 Q. Midmorning. Okay. And you said this was in
9 your office; correct?

10 A. Yes.

11 Q. And --

12 A. On the showroom floor of the dealership.

13 Q. Okay. And your office at the showroom floor,
14 I have not seen it, but does it have, like, glass
15 walls?

16 A. It does.

17 Q. So people on the outside, customers and staff,
18 can see in?

19 A. Yes.

20 Q. Okay. Do you recall where everyone was --
21 Mr. Slay and Judge Teske, where they were sitting?

22 A. Yes. So I was sitting behind the desk.

23 Q. Okay.

24 A. And so looking out, Judge Teske would have
25 been on my right, and Colin would have been on my

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1 left.

2 Q. Do you recall if they -- outside your office
3 if there were any customers or staff around when the
4 meeting happened?

5 A. I don't -- I am sure there were, but I don't
6 recall that.

7 Q. Well, do you recall when -- you said that
8 Judge Teske slammed his hand pretty hard; correct?

9 A. Mm-hmm. Yes.

10 Q. Was it very loud?

11 A. As loud as I just showed it, so.

12 Q. Okay. When he said the words money was spent
13 at a gay bar, was this in a loud voice?

14 A. It was a louder voice than him talking, but it
15 was not a scream. It was not -- it was -- it was not
16 anything I think would have scared anybody or alerted
17 anybody that was outside my office.

18 Q. Okay. And it was, like, an open palm slap?
19 (Indicating hand motion).

20 A. Right. "It was at a gay bar," you know, he
21 kind of just slammed his -- (indicating hand motion).

22 Q. Do you remember seeing if anyone outside your
23 office like jumped or noticed the noise?

24 A. No, I don't remember that. I do not believe
25 that would have been the case, though. It was not

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1 loud enough for him to -- he didn't scream it. His --
2 his voice was louder than a conversation.

3 Q. Okay.

4 A. More firm, but it was not a scream or a yell.

5 Q. Did anyone come up to you afterwards and ask
6 you --

7 A. No.

8 Q. -- what was all that commotion?

9 A. No.

10 Q. Okay. And you mentioned in your testimony and
11 in the written statement that I think was Exhibit 2
12 that Judge Teske made a comment about the media may
13 want to reach out to you; is that right?

14 A. Right.

15 Q. And you don't know for a fact that Judge Teske
16 actually contacted the media himself; right?

17 A. No. It was just rumored after the fact, but I
18 do not know -- he did not.

19 Q. Do you recall who you heard this rumor from?

20 A. No.

21 Q. Okay. If you could look at Exhibit,
22 Plaintiff's Exhibit 2, just for a moment.

23 At the very bottom of the page that is --

24 MR. BUCKLEY: Which exhibit is this?

25 MR. HILL: This is Exhibit 2.

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1 MR. BUCKLEY: All right.

2 BY MR. HILL:

3 Q. If you could go to -- do you see the -- these
4 numbers at the very bottom where it will say "Clayton
5 dash"?

6 A. Yes.

7 Q. Okay. If you could go, turn to the page that
8 says 849.

9 A. Okay.

10 Q. And then in the last full paragraph about four
11 lines down, it says: The media had or would be
12 interviewing Judge Teske.

13 Do you see that?

14 A. Yes.

15 Q. And you wrote the statement yourself; right?

16 A. Yes.

17 Q. Do you recall, why did you write "had or would
18 be"?

19 A. This is two years after the conversation with
20 Judge Teske.

21 Q. Mm-hmm (affirmative).

22 A. So trying to remember exactly what he said as
23 far as, you know, if he had already talked to the
24 media. He was letting me know that I would be
25 contacted by the media, or could be contacted by the

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1 media. So at that time I did not know if he had
2 already done so.

3 Q. Okay.

4 A. I later found out he did because I saw it on
5 TV.

6 Q. Okay. But when you wrote this you were saying
7 this is two years after the fact, so your memory
8 wasn't completely clear; right?

9 A. Not on everything, no.

10 Q. Okay. So you couldn't remember exactly what
11 Judge Teske said to you?

12 A. Not at that point on that, if he had already
13 or was going to be.

14 Q. Okay. And the next step from that since
15 the -- you know, it was two years ago from the time
16 that you wrote this statement, but sitting here today
17 it's about eight years ago --

18 A. Right.

19 Q. -- so much longer; right?

20 A. Right.

21 Q. So your memory of the conversation today is
22 even less clear than it would have been when you wrote
23 this statement; correct?

24 A. Correct.

25 Q. Okay. Is it possible that Judge Teske may

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1 have said something like "this could get out to the
2 media"?

3 A. No.

4 Q. You don't think so?

5 A. No. Because he was letting me know that I --
6 I could be contacted by the media. And so you're --
7 you're coming to tell me that Gerald is getting
8 terminated, how did you know the media -- like, how's
9 the media even involved at this point.

10 Q. Okay. Is it possible he said something like:
11 If word gets out to the media, news reporters might
12 want to talk to you, too?

13 A. He did not describe it that way.

14 Q. Okay.

15 A. He just stated that -- because I was upset
16 with him that the media was involved, and it had to do
17 with the board.

18 And so my conversation with him is why would
19 you do that? Why would you -- why would you even have
20 a conversation with the media and have -- say anything
21 about the Clayton County CASA board? Because this was
22 nothing we control. If you're going to -- we've
23 worked too hard and have such a good reputation, why
24 -- why would you even state this and correlate
25 anything to do with the Friends of Clayton County CASA

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1 board?

2 I was upset with him that he would even
3 allow -- agree for that to happen because --

4 Q. Agree for what to happen?

5 A. A conversation with the media. It should have
6 been no comment.

7 Q. Okay.

8 A. Because why would you -- just because you feel
9 like you have enough information to terminate him, why
10 would you involve the board and talk to media and even
11 shed negative light on a cause that helps abused and
12 neglected children.

13 So at the time he was telling me that the
14 media would -- could be contacting me, I'm like, well,
15 I'm not going to speak to the media. I don't have any
16 knowledge of this, and I wish you wouldn't -- you
17 wouldn't have even given them my name or told them
18 because now you could possibly be hurting an
19 organization that could be tainted for no reason.

20 Q. Okay.

21 A. So I know we had the conversation about the
22 media because I was upset of the fact that the media
23 could even get involved.

24 Q. Okay. So would it even be possible that he
25 was telling you this is a possibility, the media might

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1 be contacting you, they might find out about it and
2 you're just, like, not remembering it totally clearly?

3 MR. BUCKLEY: Object to the form.

4 A. No. I know that he had talked to the media.
5 I just don't know if he had been interviewed. I know
6 he knew about the interview. I just don't know if he
7 had been interviewed.

8 Q. How did you --

9 A. And then it was later stated that he contacted
10 the media. I didn't know that then.

11 Q. It was stated, by whom?

12 A. The -- you know, there was just a lot of talk
13 and rumors where -- that people were talking, and it
14 was stated that they felt like Judge Teske is who
15 contacted the media.

16 Q. So someone told you that's what they felt had
17 happened?

18 A. That that's what they heard.

19 Q. That's what they heard from someone else?

20 A. Right.

21 Q. So the --

22 A. Again, a lot of rumors, a lot of people were
23 talking. This was --

24 Q. Right. But you said earlier that you know
25 that he had spoken to the media at this point already,

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1 is that what you said?

2 A. That what I remembered him saying was is that
3 he would or had been interviewed already, and that I
4 -- I would be contacted or could be contacted.

5 Q. Okay.

6 A. And I never -- I never was contacted by the
7 media.

8 Q. But you don't know if he actually had spoken
9 to anyone at the media at that point?

10 A. I don't know if he had been interviewed.

11 He had to have spoken to somebody, otherwise
12 he wouldn't have known if this was a possibility that
13 I would be contacted. So he had to have spoken to
14 someone.

15 Q. Okay.

16 A. But whether he had sat down and done his
17 full-blown interview at the time that he was telling
18 me Gerald was terminated, I don't know that time span.

19 Q. Okay.

20 A. I know he had talked to the media. I don't
21 know if he went through his full-blown interview.

22 Q. But the way you know this, I think what you're
23 saying is, this is something that you put together
24 yourself --

25 A. No.

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1 Q. -- that he had spoken to the media?

2 A. He -- he was letting me know that I may be
3 contacted, could be contacted by the media. And I
4 don't remember if he was getting interviewed, or had
5 been interviewed, but that was being done, or had been
6 done.

7 But the conversation was -- with Teske is that
8 he was going to be interviewed, or had been
9 interviewed.

10 Q. Okay.

11 A. So it wasn't speculation.

12 What my point is is I don't know if it had
13 already happened, or was going to happen.

14 Q. Okay.

15 A. Like I was being warned it could happen with
16 me.

17 Q. Okay.

18 A. And I said I'm going to say no comment and not
19 be interviewed because I don't have -- I don't have
20 anything to add to this. And I wish you wouldn't have
21 involved the board because now you're going to -- it's
22 going to appear, the media could twist it, that we did
23 something wrong, and we've worked so hard to build the
24 board to where it is today.

25 So I was -- this conversation between he and I

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1 took place because I was upset that he would even do
2 that. Now, I can't --

3 Q. Did you say all of this during that
4 conversation?

5 A. Yes, yes.

6 Q. How long was this meeting?

7 A. Oh, I'm going to guess 30 minutes. I mean, I
8 don't know. It was a long time ago.

9 Q. Okay.

10 A. My point is is that he was adamant of the fact
11 that he was either interviewed, or going to be
12 interviewed, and that I would be too. And I did not
13 want that to happen.

14 Q. Okay. You don't think that Judge Teske had
15 any incentive to call the media, do you?

16 MR. BUCKLEY: Object to the form.

17 A. That would be my opinion only.

18 BY MR. HILL:

19 Q. Well, I'm asking for your opinion.

20 A. Okay.

21 Q. Is that what you --

22 A. I think -- I think that there is some
23 speculation or belief that he could have done it
24 because he liked being in the light of things: Look
25 at me, look what I found.

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1 That would only be just an opinion of knowing
2 him. I think he's done great work, and I have a great
3 deal of admiration for him. I do think that it can
4 possibly be beneficial to someone's ego, or feeling
5 good about the fact that they get to go on TV and do
6 something like this.

7 And my point to him was is that you're going
8 to hurt a program to -- for what? What do you gain
9 from that?

10 Q. Were you aware at the time that Judge Teske
11 gets appointed by the superior court judges on a
12 four-year term?

13 A. Yes. Yes, I was.

14 Q. You were?

15 A. I mean, I would know that because --

16 Q. Okay.

17 A. -- it was protocol.

18 Q. At the time of this conversation were you
19 aware that his next reappointment would have been up
20 two years later in 2015?

21 A. No, I wouldn't...

22 Q. That's a "no"?

23 A. No.

24 Q. Were you aware that Judge Teske -- at the time
25 in 2013, were you aware that he needed to continue

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1 being reappointed through 2019 in order to become
2 eligible for his full retirement?

3 A. I would not know that.

4 Q. Well, so, if anything, would you agree that
5 Judge Teske would have an incentive not to put his
6 future reappointments in jeopardy?

7 A. I would not know that.

8 MR. BUCKLEY: Object to the form of the
9 question.

10 A. I would not know that.

11 BY MR. HILL:

12 Q. Would you agree that he would not want to put
13 his future reappointments into jeopardy?

14 MR. BUCKLEY: Objection to the form.
15 Calls for speculation.

16 BY MR. HILL:

17 Q. I'm just asking.

18 A. I don't know that it would. It might help it.
19 It could help it. It could hurt it. Who knows.
20 That's --

21 BY MR. HILL:

22 Q. Explain how it could help.

23 A. In -- in his eyes it may have looked like a
24 hero. You just found something going on wrong. I
25 mean, to him it may have looked like he accomplished

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1 something, he did something, he helped the
2 organization discover something.

3 I don't know. I can't speculate what a
4 person's thinking when they do something.

5 Q. When you say discover something, what are you
6 thinking of when you say that?

7 A. What he alleged happened, which was misuse of
8 funds.

9 Q. Okay.

10 A. Because it stated in the interview with
11 Belcher the amount of money even. So, I mean, here
12 you're going on live TV and telling that you just
13 found, or what you think you found -- I didn't -- it
14 was way too soon in the investigation to even jump on
15 TV and make accusations. And you tainted an
16 organization by doing so, by even mentioning the
17 Friends of Clayton County CASA and not clarifying that
18 it was not the board; nor was there -- I mean, it was
19 still allegedly, in my opinion. It was too soon to go
20 on TV and talk about.

21 Q. Yeah. I understand you don't like -- you
22 didn't like the news reporting.

23 A. Right.

24 Q. That's pretty clear. Got that.

25 But when you're saying you thought he was

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1 going to appear like a hero like he had discovered
2 something, you are referring to alleged misuse of
3 funds, and not the fact that Mr. Bostock is gay;
4 right?

5 MR. BUCKLEY: Objection to the form.

6 BY MR. HILL:

7 Q. I'm just asking what you meant when you said
8 it. That's all I'm asking.

9 A. My point is why go in front of the media and
10 talk about something we're not even 100 percent sure
11 of, that, yes, that would be in reference to misuse of
12 funds, and even bringing the board into it --

13 Q. Okay.

14 A. -- when the board would not be privy of that
15 information.

16 Q. Okay. And sitting here today, you do not --
17 asking about your belief -- you do not believe that
18 Judge Teske has some problem with gay people today;
19 right?

20 MR. BUCKLEY: Object to the form.

21 A. I don't -- I do not know what Judge Teske
22 feels. I --

23 BY MR. HILL:

24 Q. I'm asking your belief.

25 A. -- do not think so.

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1 MR. BUCKLEY: Don't interrupt her, let
2 her finish.

3 A. I do not think he did.

4 BY MR. HILL:

5 Q. Mm-hmm (affirmative).

6 A. That's why it was such a shock to me that day
7 in my office that he brought it up, and that was the
8 conversation. I'm like, well, you knew that.

9 And the reason I responded that way, because I
10 was shocked that that was his point. How he feels
11 about it, I can't -- I can't tell you how a person
12 feels about a situation or another person.

13 Q. Okay.

14 A. I never got the impression it bothered him.

15 Q. Okay.

16 A. But for whatever reason in my office he made
17 it real clear that it was at a gay bar that the funds
18 were spent at.

19 Q. Okay. You're familiar with the term
20 "scandal"; right?

21 A. Yes.

22 Q. What's your understanding of that term?

23 A. That you do something that's not ethically
24 right. It's scandalous. It's inappropriate. It's --

25 Q. In your experience do public figures typically

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1 want to tell the public about scandals in their
2 office?

3 MR. BUCKLEY: Objection to the form.

4 A. I think --

5 MR. BUCKLEY: Overbroad, speculative.

6 A. I think they want to prosecute someone that
7 did something unethically, or -- or did something
8 criminally wrong. Whether you want to tout it on the
9 media, I don't know that that's the position.

10 BY MR. HILL:

11 Q. When a public figure says someone under his
12 supervision, someone for whom he was responsible, was
13 misusing public funds, that would qualify as a scandal
14 in your mind; correct?

15 MR. BUCKLEY: Objection to the form.

16 A. Well, I think if you -- if someone misused
17 funds, stole, or did not do with funds what they are
18 supposed to do, yes, that could be considered
19 unethical, criminal, scandalous, whatever you want to
20 call it.

21 BY MR. HILL:

22 Q. And I think you testified that the news story
23 that ran did not reflect well on the CASA board;
24 right?

25 A. Correct. For whatever reason, they showed

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1 pictures of the board while they were airing the
2 story. So the shot would show Judge Teske's testimony
3 or interview, and then it would show pictures of the
4 board scrolling. It wasn't very long.

5 Q. Mm-hmm (affirmative).

6 A. But it did show the -- it did show board
7 pictures.

8 Q. And that same news story, would you agree it
9 did not really reflect well on Clayton County?

10 A. I would -- I would think it would not reflect
11 well on the program, not necessarily the County
12 itself, but the program.

13 Q. Okay. Well, the news story, would you agree
14 that it did not -- it did not make Judge Teske look
15 like he was doing a good job supervising the child
16 welfare director; right?

17 A. I don't know if anybody would have looked at
18 it that way considering there is multiple levels of
19 supervision, but, yes, you could interpret that he
20 could be at fault for allowing something to happen.
21 But there were multiple levels of supervision.

22 Q. You mentioned earlier this word taken money,
23 or stolen funds when you're talking about what Judge
24 Teske informed you he was accusing Mr. Bostock of.

25 Did he -- he didn't actually use the word,

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1 Judge Teske I'm talking about. He did not actually
2 use the word stolen, did he?

3 A. I believe that conversation come out after the
4 fact, but not in my office. Misuse of funds he
5 took -- I believe it was took, not necessarily stolen.
6 But I, again, can't swear to the exact language of
7 stolen, taken, or misused --

8 Q. Okay.

9 A. -- but.

10 Q. It was not your understanding that Judge Teske
11 was accusing Mr. Bostock of having pulled money out of
12 the GAL account and put it in his own pocket, was that
13 it?

14 A. Not in my office, I don't believe so, no.

15 Q. Did he ever accuse -- I mean, did you ever get
16 the impression that that's what he was accusing
17 Mr. Bostock of doing?

18 A. After the fact when I brought up the bank
19 statements when we were talking, and I stated I
20 couldn't see any misuse of funds, that I'd looked over
21 bank statements, a comment was made that it was told
22 that cash was taken.

23 I cannot recall if he stated "stolen" or
24 "taken" in my office as much as just referring to the
25 misuse of funds.

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1 Q. Okay. So is it correct to say that Judge
2 Teske was telling you that Mr. Bostock was using the
3 GAL funds to pay for things that he should not have
4 been using the GAL funds for?

5 A. Correct.

6 Q. That's correct. Okay. And we talked earlier
7 about the Memorandum of Understanding, which I think
8 is Exhibit 3.

9 A. Yes.

10 Q. And you did not draft the Memorandum of
11 Understanding; correct?

12 A. No, I did not.

13 Q. And you were not responsible for enforcing the
14 terms of the Memorandum of Understanding?

15 A. Correct.

16 Q. And you were not responsible for making sure
17 that Mr. Bostock complied with the Memorandum of
18 Understanding?

19 A. Correct.

20 Q. Okay. And I know that you testified that you
21 believed Mr. Bostock's expenses complied with the
22 Memorandum of Understanding, but you'd agree Judge
23 Teske could have a different opinion as to whether the
24 expenses complied with it?

25 A. I would go by what was in writing. And based

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1 on the receipts I saw, complied with what was in
2 writing. I don't know what he thought.

3 Q. Did you ever see the internal audit that was
4 done?

5 A. No.

6 Q. Okay. Do you have any knowledge about the
7 audit at all?

8 A. No.

9 Q. So you wouldn't know if the -- if I said the
10 auditor believed that a lot of the expenses did not
11 comply with the Memorandum of Understanding, you don't
12 have any knowledge one way or the other?

13 MR. BUCKLEY: Object to the form.

14 A. I don't know what the auditor thought.

15 BY MR. HILL:

16 Q. Okay. To clarify something about the bank
17 account, we were talking about -- the word bank
18 account was used, but there's is really -- my
19 understanding is there is three bank accounts; that
20 there was one bank account in the name of Friends of
21 Clayton County CASA that the board used to pay for
22 fundraising events and overhead for guardians ad litem
23 and volunteer appreciation events; is that correct?

24 A. Correct. And when you say "overhead," so,
25 like, mileage reimbursements or something like that.

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1 Q. So would that come -- well, first, let me lay
2 out the three before we get into the details of them.

3 So my understanding is there is three
4 accounts. There is a Friends of Clayton County CASA
5 account. Then there is a second account that's also
6 in the name of Friends of Clayton County CASA, but it
7 is the guardian ad litem account. And then there is
8 the third account called the Ambassadors of CASA; is
9 that correct?

10 A. Correct.

11 Q. Okay. And --

12 A. I believe so, that there was three. I can't
13 swear --

14 Q. Okay.

15 A. -- to it without going back and looking.

16 Q. Do you know what the difference is between
17 these three accounts?

18 A. The guardian ad litem account would be -- so
19 the guardian ad litem funds that the court took in --

20 Q. Mm-hmm (affirmative).

21 A. -- was not the Friends of Clayton County CASA
22 money. That was separate.

23 Q. Okay. Okay.

24 A. If I recall, I believe Jane Glaze assisted
25 because of her treasurer's experience, her paralegal

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1 experience, she assisted with that.

2 Q. Okay.

3 A. The Friends of Clayton County CASA would be
4 more what I referred to as board funds --

5 Q. Okay.

6 A. -- and what we used for volunteer
7 recruitments, or volunteer recognitions, things like
8 that.

9 Q. Okay.

10 A. I cannot remember everything we used it for,
11 but in a summation that's the best way to describe,
12 that it was to help with events and things that were
13 needed to continue supporting the CASA program.

14 Q. Okay. So just -- we can set up some terms
15 just to make it clear what we're talking about.

16 That account that you were just describing,
17 you referred to it as board funds; can we just call it
18 the CASA board account?

19 A. Sure.

20 Q. Okay. And then the other one that you
21 mentioned, which was funded by fees that people paid
22 into the court, that's the GAL account?

23 A. Yes.

24 Q. And do people say "G-A-L," or do they say
25 "gal"?

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1 A. Guardian ad litem, G-A-L.

2 Q. So you say G-A-L?

3 A. Yeah.

4 Q. I just wasn't sure if you actually say "gal",
5 because --

6 A. G-A-L.

7 Q. Okay. Got it. Okay. So we've got the GAL
8 account. We've got the board account. What is the
9 Ambassadors of CASA account, if you know?

10 A. So the best way to describe it is a
11 subcommittee of the board. They -- they worked more
12 towards events to help the children. So direct impact
13 for the kids, Ambassadors Behind CASA. So doing
14 things like Christmas, or presents, or to really help
15 -- help more support the program.

16 Q. Okay.

17 A. More directly impacted the children is what it
18 would be.

19 Q. Who was in charge of that event?

20 A. Oh, goodness. I believe the board.

21 Q. Okay.

22 A. It wasn't very much. It was a very small
23 account. And I believe we set that up sometime
24 probably about -- I would be clearly guessing, but
25 somewhere halfway between the time of me serving on

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1 the board. I can't recall exactly. I know it wasn't
2 a large amount, and it was a subcommittee of CASA.

3 Q. Okay.

4 A. And they -- it was a group of ladies -- or
5 there may have even been a male, I don't know -- but
6 that didn't want to make the commitment of serving on
7 the board, but would -- but wanted to be a volunteer
8 to help --

9 Q. Okay. How was --

10 A. -- assist.

11 Q. Okay. That's the Ambassadors of CASA?

12 A. Correct.

13 Q. How was that account funded?

14 A. I don't recall.

15 Q. Okay. But you think the -- you believe the
16 board controlled that account?

17 A. I believe so, yes.

18 Q. Okay. And the other account that we're
19 calling the board account, and you said that was to
20 support fundraising events and volunteer appreciation?

21 A. It was to support the programs.

22 Q. Programs.

23 A. So whatever the CASA program needs were, for
24 recruitment of volunteers, appreciation. It was --

25 Q. Okay.

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1 A. -- probably spent more towards appreciation,
2 if you were to audit that account. It was more
3 directly towards doing things, like, a volunteer
4 reception once a year.

5 Q. Okay.

6 A. Bringing all the volunteers in, feeding them,
7 recognizing them with a volunteer of the year --

8 Q. Okay.

9 A. -- and things like that. It was to not only
10 just recruit, but to also help maintain volunteers.

11 Q. And when you say volunteers, are you talking
12 about the guardians ad litem, or are you talking about
13 people who volunteered at other events?

14 A. Mainly the guardian ad litem. But, again, it
15 was supporting the CASA program.

16 Q. Okay.

17 A. And they were a group of people that are
18 volunteers that are guardian ad litem.

19 Q. And that's the board account?

20 A. Correct.

21 Q. What about the GAL account?

22 A. I -- that was through the courts. So we did
23 not vote on, or take in that money, or make the
24 decisions on how that money was spent.

25 Q. So you don't know what that account was

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1 supposed to be used for?

2 A. Well, other than based on what the Memorandum
3 of Understanding states.

4 Q. Okay. The Memorandum of Understanding. So is
5 it your view that the Memorandum of Understanding
6 relates to the GAL account, and not the other two
7 accounts?

8 A. This Memorandum of Understanding was the
9 court.

10 Q. Mm-hmm (affirmative).

11 A. And so that would have had to do with GAL.

12 Q. Okay.

13 A. Not the -- not the -- not the Friends of
14 Clayton County CASA board.

15 Q. Okay. Is there a document that says what the
16 Friends of Clayton -- what the board account was for?

17 A. There would be a mission statement for the
18 Friends of Clayton County CASA, and stating what our
19 mission is.

20 Q. Okay.

21 A. I don't know that there was a Memorandum of
22 Understanding that stated how we spent our funds.

23 Q. Okay.

24 A. And when I say "we," the Friends of Clayton
25 County CASA. But I can't remember exactly who all

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1 would have had anything to do with the GAL money other
2 than the funds. And I think that Jane Glaze helped
3 administer, separate from the Friends of Clayton
4 County board she assisted with, I think, reconciling
5 the account, or opening the account, or if they needed
6 something --

7 Q. Okay.

8 A. -- as a treasurer I believe she was involved.

9 Q. Well, one thing that I'm kind of confused by
10 is you're saying the board had no control over the GAL
11 account; right?

12 A. We did not vote on those funds and how they
13 were spent.

14 Q. Okay. It was opened up in the name of Friends
15 of Clayton County CASA; correct?

16 A. I believe so.

17 Q. Okay. And when you went to Heritage --

18 A. And I believe the purpose for that was because
19 Jane Glaze, who was a board member, was assisting.

20 Q. Okay.

21 A. Assisting with any, you know, spending or
22 keeping up with the funds or writing a check, if a
23 check had to be written. It was easier for Jane to
24 help versus going through the court system and setting
25 up -- that would have had to have been like a budget

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1 item, I believe --

2 Q. Okay.

3 A. -- if I remember. That's a long time ago, but
4 I remember a conversation about it would have been --
5 it was easier for her to help.

6 Q. Did you set up the accounts?

7 A. I don't believe so.

8 Q. All right.

9 A. I know I wasn't a check signer for that
10 account.

11 Q. Okay. Were you involved in the decision to
12 give Mr. Bostock check cards to the accounts?

13 A. For the Friends of Clayton County CASA?

14 Q. Either for that, or the GAL account.

15 A. So definitely the Friends of Clayton County
16 CASA.

17 Q. Okay.

18 A. We -- our board would have been fine with
19 that, and would have done it.

20 The GAL money, I cannot recall if we discussed
21 that 100 percent, but I know that he had a debit card.

22 Q. Okay. So he had two debit cards, one for the
23 GAL account, and for the board account; correct?

24 A. Correct.

25 Q. Okay. And you don't know what the GAL account

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1 was to be used for, but you know what the board
2 account was to be used for; correct?

3 A. At the -- well, I do know what the GAL money
4 was supposed to be used for.

5 Q. Okay.

6 A. We just didn't approve it. I was aware of
7 what it was for.

8 Q. What's your understanding of what it -- the
9 GAL account is to be used for?

10 A. To help recruit volunteers, to help advertise
11 or market the CASA program. I mean, I think there is
12 three or four.

13 Q. So the board account was not to be used to
14 advertise the CASA program?

15 A. It was to help support the CASA program.

16 Q. Okay. It just sounds like they're both being
17 used for kind of the same thing, and I'm not really
18 clear on why there are two different accounts.

19 A. The money for the GAL come in through the
20 court system.

21 Q. Mm-hmm (affirmative).

22 A. It was a required fee that parents were
23 required. And so that money -- although, both the end
24 result was, could be used for to build the CASA
25 program and to keep it going --

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1 Q. Mm-hmm (affirmative).

2 A. -- both of us, that was our goal. We, the
3 Friends of Clayton County CASA board, our goal was to
4 help support the CASA program.

5 Q. Mm-hmm (affirmative).

6 A. The way you help support the CASA program is
7 ensuring that we had volunteers, that the volunteers
8 stayed, that the volunteers felt appreciated. And so
9 we -- the Friends of Clayton County CASA board was set
10 up to clearly support the program that was managed by
11 the juvenile court.

12 Q. Okay.

13 A. The juvenile court also had a Memorandum of
14 Understanding and funds that they could use to help
15 improve the program, the CASA program.

16 Q. Okay.

17 A. So, yes, both had the same goal, which is to
18 make sure that the program sustained and grew as our
19 -- as our needs grew. But that money come in two
20 different ways. We fundraised. The Friends of
21 Clayton County CASA fundraised for ours.

22 Q. Okay.

23 A. The GAL account was funds that parents had to
24 pay. And I'll be honest, I don't know that I'm
25 100 percent explaining it right. I don't know if it

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1 was a requirement. I don't know if it was -- I can't
2 remember if it was required that each parent pay a
3 certain amount, but that is what the GAL funds were.

4 Q. Okay.

5 A. They were brought in through the court system,
6 and the judge and whoever signed the Memorandum of
7 Understanding made the decision that this is how we
8 would spend those funds.

9 Q. Okay. That's your understanding, but you're
10 not totally sure on the details; right?

11 A. Well, I'm sure based on this Memorandum of
12 Understanding.

13 Q. Okay. And the Memorandum of Understanding
14 says that the -- that's to be used for recruitment,
15 training, and retention of the guardian ad litem
16 volunteers?

17 A. Correct. And there's even information about
18 to have competent, professional staff. That's very
19 open-ended. You could -- you could use that for a lot
20 of reasons, but it -- there's four objectives.

21 Q. Mm-hmm (affirmative).

22 A. Competent, professional staff; supportive
23 environment for recruitment, training and retention of
24 volunteers.

25 Q. Mm-hmm (affirmative).

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1 A. Opportunities for volunteers to form caring,
2 committed relationships with children and their
3 families. A provision of concise, meaningful report
4 containing thoughtful well-reasoned recommendations
5 that assist the court in the meeting the needs of the
6 child -- in meeting the needs of the child.

7 Q. Okay. And since both the board account and
8 the GAL account, they were both in the name of Friends
9 of Clayton County CASA, is it correct that you could
10 have reviewed the bank statements whenever you wanted
11 to for both accounts?

12 A. I believe -- I believe I could have, yes.

13 Q. And --

14 A. It was -- it was more so for -- to help assist
15 Jane --

16 Q. Mm-hmm (affirmative).

17 A. -- in writing a check or keeping the funds for
18 the court.

19 Q. And I think you testified earlier that when
20 you did want to see the bank statements for the GAL
21 account that you went to Heritage Bank, and they gave
22 you bank statements?

23 A. Correct.

24 Q. Okay. But you did not regularly, excuse me,
25 regularly review the GAL account bank statements;

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1 right?

2 A. No.

3 Q. Okay.

4 A. Not that I recall.

5 Q. Right. And the reason you didn't do so is
6 because you did not see it as the board's money, you
7 saw it as the court's money?

8 A. Right.

9 Q. Okay. Are you aware that when Mr. Bostock
10 initially was questioned about how the GAL account
11 funds were being spent he said that the GAL account
12 was not the County's money?

13 MR. BUCKLEY: Objection to the form.

14 A. I'm not aware. I don't -- I don't know that.

15 BY MR. HILL:

16 Q. Okay. Are you aware that when Mr. Bostock was
17 asked about sponsoring a softball team in Midtown
18 Atlanta that he said that you and the board had
19 approved it?

20 A. We were aware of it.

21 Q. Okay.

22 A. I don't know what Gerald told the court, but
23 we were aware.

24 Q. Okay.

25 A. It was discussed in our board meeting, and no

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1 one had any objection to it.

2 Q. Okay. And --

3 A. There -- I believe, too, that there was some
4 confusion that may even be on -- on Gerald's part --
5 and I'm speculating only.

6 Originally when the Memorandum of
7 Understanding come out, they put it that the board
8 would be involved because originally the first draft
9 of the Memorandum of Understanding had board as a
10 signature on the Memorandum of Understanding, and the
11 judges made the decision to remove the board.

12 Q. Okay.

13 A. And I believe the draft was -- did not
14 include, the final draft did not include the board.

15 I think originally they -- they had
16 anticipated that the board -- and that may have even
17 been how Jane got involved, because Jane has been a
18 CASA for many years, and had -- was very instrumental
19 in helping the CASA program grow. And so she was more
20 than willing to have multiple hats, so to speak, in
21 helping with the court and the Clayton County CASA
22 board.

23 Q. Okay. So you remember another draft of the
24 Memorandum of Understanding before this one?

25 A. Originally there was one with board

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1 participation on the Memorandum of Understanding.

2 Q. Okay. This written statement that you
3 prepared in 2015, I think you stated that you prepared
4 this statement for Investigator Allen Crenshaw with
5 the Clayton County District Attorney's office; is that
6 right?

7 A. I don't remember the name, but it was somebody
8 from the district attorney's office had requested that
9 I put in writing.

10 Q. Okay. But if his name is on the second page
11 of it, Allen Crenshaw, that refreshed your
12 recollection?

13 A. That is correct.

14 Q. Okay. And you understood at the time that
15 Investigator Crenshaw was conducting a criminal
16 investigation; right?

17 A. I believe so. I don't know that it to be
18 criminal, but I would assume if it's coming from the
19 district attorney's office, yes.

20 Q. Okay. That's what you believed at the time;
21 right?

22 A. Yes.

23 Q. And you met with Investigator Crenshaw at your
24 dealership in 2015?

25 A. I believe that's when it was.

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1 Q. Okay. What did you talk about during that
2 meeting?

3 A. I don't remember. I mean, he asked me some
4 questions, and then he asked me to put anything I knew
5 about the questions he asked me in writing and so I
6 did.

7 Q. And is that this statement?

8 A. I vaguely -- I -- yes, yes, it is that
9 statement. I vaguely recall my conversation with him.

10 Q. Okay. So did you not prepare this statement
11 before you met with him?

12 A. I do not remember. But he's the one that
13 asked -- whoever it was I interviewed with asked me
14 would I put in writing my statement. Whether we met
15 before or after I can- -- in person, I cannot recall.

16 Q. Okay. But you may have -- do you remember if
17 you gave him this written statement at the time that
18 you met with him, hand-delivered it to him?

19 A. I do not remember.

20 Q. Okay. Had you -- did you talk to Investigator
21 Crenshaw more than once?

22 A. I don't remember.

23 Q. Okay. When you wrote this statement you
24 wanted to make clear to Investigator Crenshaw that you
25 had no knowledge of any potential criminal liability;

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1 right?

2 MR. BUCKLEY: Object to the form.

3 A. I mean, I don't know that that was my purpose,
4 but.

5 BY MR. HILL:

6 Q. Well, that's what I'm asking, if it was or
7 not.

8 A. No, I wasn't -- wasn't concerned about
9 anything criminal in relation to the board. I was
10 only concerned about the appearance through the media
11 that we had had some involvement.

12 But I had no concern about any criminal
13 involvement from my perspective or any of my board
14 members.

15 Q. Okay. So when you wrote this, it would not --
16 would it be correct to say that you were --
17 especially when you make the statement that the
18 board -- let me get the words right.

19 When you state that the GAL account, that it
20 was not FCCC board money, is it not correct that
21 you're wanting to distance yourself from any potential
22 criminal liability for yourself when you're making
23 this statement?

24 A. I don't believe that that would have crossed
25 my mind because I did not feel that we as a board were

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1 the ones being questioned, or allegedly asked or
2 thought of to have taken any money.

3 Q. Okay.

4 A. I think I was more concerned about the what
5 this was doing to our board and our -- the board of
6 directors and the program in general. Like, we
7 were -- we were opening the door for people to believe
8 that others had -- had -- we had done something wrong.

9 So in that statement I'm -- I'm not concerned
10 about anything that we did wrong, but more so just
11 making sure that everybody understands that the money
12 come into the court system, and we did not collect the
13 money, therefore, we didn't spend the money. And the
14 board really shouldn't be the one that it appears as
15 when you're getting interviewed in the media that we
16 did something wrong.

17 Q. Okay. I should have cleared this up earlier
18 when we were talking about the two different accounts.

19 If a guardian ad litem turns in an expense
20 report, or there is, like, mileage for driving out
21 some far distance to visit with a child, would that
22 come from -- would that be reimbursed from the GAL
23 account, or the board member?

24 A. Oh, let me think about that for a minute. So,
25 this was a long time ago. I believe if it was a

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1 volunteer, it would have come out of the Friends of
2 Clayton County CASA board, but I can't swear to that,
3 to be honest with you.

4 Q. And any volunteer -- just to clarify,
5 volunteer guardian ad litem?

6 A. Right, yeah.

7 Q. Not a volunteer at the Duck Derby?

8 A. It may have come out of either. It may have
9 come out of GAL. But I believe we, as in the Friends
10 of Clayton County CASA board, helped reimburse for
11 mileage for our volunteers.

12 Q. Okay.

13 A. The guardian ad litem.

14 Q. Okay. So is it your understanding that it
15 would be appropriate to reimburse from either account?

16 A. It would be inappropriate under the Friends of
17 Clayton County CASA; for the guardian ad litem I would
18 refer back to the Memorandum of Understanding, but I
19 believe it was --

20 Q. Okay.

21 A. -- reimbursed. And, again, I mean, you're --
22 you're talking 2013?

23 Q. Mm-hmm (affirmative).

24 A. So trying to remember after serving on
25 multiple boards since then --

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1 Q. Right, so you're --

2 A. -- exactly what we reimbursed, I wouldn't
3 swear to exactly where.

4 Q. Okay. What about --

5 A. We were -- we were to support the program. So
6 if in that means we helped with mileage
7 reimbursements, or any type of volunteer recruitment
8 or retention, that would have been appropriate to come
9 out of --

10 Q. Okay.

11 A. -- Friends of Clayton County CASA funds.

12 Q. How about this. Let's say if you -- if
13 Mr. Bostock, or some -- let's say if Mr. Bostock meets
14 with someone at a restaurant or a bar, and talks to
15 them about volunteering for the Duck Derby, for
16 instance, and treats them to a meal or drinks or
17 whatever, would that money come out of the board
18 account, or would that money come out of the GAL
19 account?

20 A. That money would have come out of the GAL
21 account is my understanding.

22 Q. Okay. Definitely not the board account?

23 MR. BUCKLEY: Objection to the form.

24 A. Not -- I'm not going to say never. I don't
25 remember.

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1 BY MR. HILL:

2 Q. Okay.

3 A. I'm not going to say we never reimbursed,
4 because I have taken people out to dinner or to lunch,
5 and would have gotten reimbursed. Jane would have
6 done the same thing. So to say Gerald didn't get
7 reimbursed would be incorrect because he was -- he had
8 the same authority to help recruit --

9 Q. Mm-hmm (affirmative).

10 A. -- and advocate for the program. And that's
11 what Friends of Clayton County CASA did.

12 So with his debit credit card, with Jane
13 Glaze, with myself, yes, we could have used that.

14 Q. But you didn't have a debit card for the GAL
15 account; right?

16 A. I did not.

17 Q. You -- so if you engaged in -- in, like, a
18 recruitment activity like I have just described, you
19 would use the check card for the board account;
20 correct?

21 A. Correct.

22 Q. Okay. Okay. And it's been a while, so you're
23 not clear on exactly which card Mr. Bostock was
24 supposed to use for those types of events; is that
25 right?

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1 A. It would have been appropriate for either.

2 Q. Okay. Okay.

3 A. Because both -- we're supporting the
4 program --

5 Q. Mm-hmm (affirmative).

6 A. -- which is recruitment of volunteers.

7 Q. Mm-hmm (affirmative).

8 A. And the Memorandum of Understanding is for
9 recruitment of volunteers, so we're a support group
10 for that program.

11 Q. Okay. You mentioned earlier that you saw
12 Judge Teske tell Mr. Bostock to pay for open bar tabs
13 at, like, Chili's or Carrabba's when an attendee at
14 the event had left the tab unpaid; right?

15 A. Correct.

16 Q. About how many times do you remember seeing
17 this?

18 A. More than once, less than a handful would be
19 my guess. That's clearly a guess.

20 I know he's attended more than one event, and
21 I know we've, unfortunately, got stuck with a bar tab
22 more than once, even though we would reiterate to our
23 volunteers that it was their responsibility, it seemed
24 to never fail that at one of the two events that we
25 had each year someone would leave thinking it was a

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1 sponsored event --

2 Q. Mm-hmm (affirmative).

3 A. -- and did not pay for their drinks, so.

4 Q. This is the Soup and Quackers; is that right?

5 A. Yeah. Soup and Quackers.

6 Q. That's one of the events. The other one being
7 the -- you said two events?

8 A. So we would have the Soup and Quackers, and we
9 would have, I can't remember what we would call the
10 other event -- but typically we would have a kick-off
11 event. And so Carrabba's and Chili's were our two
12 main sponsors over the years --

13 Q. Okay.

14 A. -- and would typically -- their sponsorship
15 would be for food.

16 Q. Mm-hmm (affirmative).

17 A. And then they would have a set menu, and if
18 anybody wanted to buy anything in addition, you know,
19 they would be responsible in addition to the drinks.

20 Q. Okay. And so the general policy for those
21 types of events is alcohol's not covered, everyone is
22 on their own for alcohol; right?

23 A. That is what we would let people know. But
24 they would forget, or purposely, who knows what the
25 reasoning --

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1 Q. Yeah, I understand.

2 A. -- but alcohol would be paid for because
3 someone would leave.

4 Q. Okay. And were those the only times under
5 those kind of circumstances, that no other times
6 that -- sorry. Let me start over clearly. Scratch
7 that.

8 Other than the events that you just described
9 where someone left a bar tab unpaid at one of these
10 events, no other times when you saw Judge Teske tell
11 Mr. Bostock to pay for alcohol; is that right?

12 MR. BUCKLEY: Object to the form.

13 A. I can remember specifically at the events at
14 Carrabba's or Soup and Quackers. I cannot remember if
15 there were other times.

16 BY MR. HILL:

17 Q. Okay. And Judge Teske on those occasions did
18 not tell Mr. Bostock to pay for the alcohol of anyone
19 else other than the attendees who happened to have
20 left without paying their tab; right?

21 A. Now, I can't remember or swear to who all was
22 on that tab.

23 Q. Mm-hmm (affirmative).

24 A. I know -- I mean, I couldn't tell you what all
25 it was for.

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1 Q. No, no, no. I'm not asking like for the names
2 of the people. I'm just saying that when -- when you
3 say that Judge Teske says -- tells Mr. Bostock it's
4 okay to pick up this tab, he's only talking about the
5 people who left without paying; right?

6 A. Well, that's what I'm saying to you. I don't
7 know if it was additional tabs.

8 Q. Okay.

9 A. I don't know if they chose to pick up staffs'
10 tab, or I don't know.

11 Q. You never -- you don't have any memory of
12 Judge Teske saying "pick up everyone's tab," right?

13 A. We -- I cannot recall a time when we had to
14 pick up everyone's tab. I'm not going to say that
15 didn't happen, but I don't recall a time.

16 Q. You have no knowledge of whether it happened?

17 A. Right.

18 Q. Okay.

19 A. Right. What I do remember is that we had paid
20 multiple times for alcohol at events.

21 Q. Okay. But fewer than a handful of times. I
22 think that's what you said earlier?

23 A. Of him being told -- of me hearing him say
24 it's okay to pay, go ahead and pay.

25 Q. So you think there were other times when it

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1 happened that you did not witness?

2 A. I don't know that.

3 Q. You don't know?

4 A. I do not know that. I can't swear to that.

5 Q. Okay. So I just wanted to set, like, outer
6 boundaries of, like, number of times. The only ones
7 you know about are more than once, but fewer than a
8 handful; right?

9 A. That's what I can remember.

10 Q. Okay. No other times that you know of where
11 Judge Teske authorized paying for alcohol; right?

12 A. That I can remember.

13 Q. Okay. And you'd agree that it would be unfair
14 to Chili's or Carrabba's if they had to write off that
15 bar tab because someone left without paying; right?

16 A. I would not have expected Chili's or
17 Carrabba's to pay for alcohol, because that was the
18 rule.

19 Q. Yeah. And so if the waitress comes over and
20 tells you that someone left, and they haven't paid?

21 A. Gerald would typically pick up the tab and pay
22 for it.

23 Q. Okay. And, otherwise --

24 A. And there may even be times that myself or
25 Jane did. It wasn't --

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1 Q. Do you remember? Do you remember ever doing
2 that?

3 A. I'm sure there was a time. We're talking
4 about --

5 Q. Well, I mean, are you guessing, or you're
6 saying you remember doing it?

7 A. I can't remember specifically, but I'm sure
8 there was. It was not uncommon, I guess is my point
9 to you.

10 Q. Okay.

11 A. You're talking about over eight-plus years, us
12 meeting two times a year at these events, and it was
13 not -- we tried really hard to make sure people knew
14 they were responsible for alcohol.

15 Q. Mm-hmm (affirmative).

16 A. Over eight years there would always be times
17 we're all sitting there going, great, it happened
18 again, you know, somebody didn't pay for their
19 alcohol, or there's a waitress that walks up.

20 So, between Gerald, or Judge Teske, or Colin,
21 or John, or Jane, we were typically always the one at
22 the end --

23 Q. Mm-hmm (affirmative).

24 A. -- making sure everything went fine, and
25 telling everybody our goodbyes and thank yous.

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1 So, typically, it was upper management and
2 Jane and myself who typically stayed back. And so
3 between us, I know that on more than one occasion we
4 paid for alcohol.

5 Q. On those occasions when it happened, did
6 Mr. Bostock go to Judge Teske and say: Should I use
7 the account? Or did he -- or what should I do?

8 A. I remember specifically one time at Chili's at
9 the bar that Judge Teske said, yes, pay for --

10 Q. Okay.

11 A. -- alcohol specifically. Whether he just
12 volunteered that, Gerald asked, I don't remember.

13 Q. Okay. And this might be clear, but you
14 didn't -- you did not witness Judge Teske give
15 Mr. Bostock a blanket approval to always pay for
16 alcohol with GAL funds; right?

17 A. I did not ever hear those words come out of
18 his mouth.

19 Q. Or anything, any words to that effect?

20 A. No.

21 Q. Okay. And if those tabs had not been picked
22 up, that would reflect poorly on the County or the
23 CASA organization?

24 A. Somebody had to pay for those tabs, yes.

25 Q. Right, right. And you mentioned earlier that

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1 you saw Judge Teske drink alcohol at some of these
2 events; right?

3 A. Yes.

4 Q. And you don't have any knowledge about how he
5 paid for that alcohol, do you?

6 A. No.

7 Q. Okay. The bank statements that you mentioned
8 that you went to Heritage Bank after your resignation
9 and picked up -- you know what I'm talking about?

10 A. Yes.

11 Q. Okay. Was it for the board account, or the
12 GAL account?

13 A. The GAL account.

14 Q. Okay. And --

15 A. I have the board account.

16 Q. Okay. You regularly reviewed the board
17 account?

18 A. Correct.

19 Q. Okay. Do you recall -- I know you said --
20 actually, I'm not sure if this was asked. Do you
21 still have those bank statements today?

22 A. I do not know.

23 Q. Okay. You might have them at home?

24 A. I might at the dealership.

25 Q. Okay.

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1 A. I have a bunch of old CASA files that are just
2 in a box. I don't know what I kept and didn't keep.

3 Q. Okay. With -- to follow up on Mr. Buckley's
4 request that you were going to look for the potential
5 third page to that statement, would you agree to also
6 look for these bank statements?

7 A. Yes.

8 Q. Okay.

9 MR. BUCKLEY: And if you find them, can
10 you furnish it to both of us?

11 THE WITNESS: Both, yes.

12 MR. BUCKLEY: Thanks.

13 THE WITNESS: Can I get both of your
14 cards before we leave so I'm sure I have the
15 address?

16 MR. BUCKLEY: Yeah. I'll have to run
17 back to my office and get you one.

18 BY MR. HILL:

19 Q. And -- and also, this goes without saying, but
20 I would want a copy of the third page of the
21 statements.

22 A. Yes.

23 Q. Do you remember what these bank statements
24 showed when you looked at them back in 2015?

25 A. Yes. I remember looking at them, and seeing

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1 several on every month, it was not uncommon to see
2 debit card withdrawals at restaurants, Waffle House,
3 Chick-fil-A, a various amount of different
4 restaurants. They looked to be pretty consistent,
5 month in and month out, but it was common that there
6 would be debit purchases at a restaurant.

7 Q. Okay. And just from seeing a debit purchase
8 at a restaurant, based on that information alone you
9 can't tell if that's for volunteer recruitment, or
10 just a regular old meal; right?

11 A. Not by looking at a bank statement, no.

12 Q. Okay. To follow up on the conversation you
13 had with Judge Teske over speaker phone where Debbie
14 Stinson called you --

15 A. Yes.

16 Q. -- that conversation. Okay. That was a
17 heated conversation; right?

18 A. It got heated, yes.

19 Q. And Judge Teske wanted you to call the board
20 members together so he could explain why Mr. Bostock
21 was terminated; is that right?

22 A. Correct.

23 Q. And that's an understandable reason to call a
24 meeting; right?

25 A. Yes.

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1 Q. Okay. But I think you mentioned you were out
2 of town so it was not convenient for you at the time;
3 right?

4 A. So, a board meeting was called without my
5 knowledge.

6 Q. It was called. Okay.

7 A. And I found out about it. And that's when I
8 stated, no, we can't call an emergency board meeting.
9 For, one, it was a very, very, very short notice.
10 Two, I wasn't going to be there, and I felt like it
11 was important, being a board chair, that I was in
12 attendance.

13 Q. Mm-hmm (affirmative).

14 A. And me or the co-chair should have been the
15 one calling a special board meeting, not -- not a --
16 an employee of the court.

17 And so I requested that that board meeting be
18 cancelled, that we not hold the board meeting, and
19 that I would schedule a board meeting. And I was
20 happy to do so, but it would have to be at a -- on a
21 different date when I was available.

22 Q. Okay.

23 A. And to give us all more notice.

24 Q. And I think you were saying Judge Teske was
25 kind of getting upset that you were questioning his

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1 authority over the CASA program; is that right?

2 A. Correct.

3 Q. Okay. And CASA is a court program; right, in
4 Clayton County?

5 A. CASA is a court program. The -- the board is
6 not a court-mandated program.

7 Q. Okay. I appreciate that distinction.

8 A. The board does not fall under the authority
9 of --

10 Q. Okay.

11 A. -- the court, the juvenile court.

12 Q. But the -- the court could choose to dissolve
13 the CASA program if it wanted to; right?

14 A. The CASA program, yes.

15 Q. And if that happened, the board would also --

16 A. Would not be needed, right.

17 Q. -- would cease to exist; right?

18 A. Correct.

19 Q. Okay. And when Judge Teske was speaking to
20 you over the phone, he was speaking to you as the
21 chief judge of the juvenile court; right?

22 A. Yes.

23 Q. Okay. And when you told him that you did not
24 work for him, he responded that if you did you would
25 have been fired, too. Didn't he say that?

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1 A. I don't remember those words specifically.

2 Q. Did he say something like that?

3 A. He stated --

4 MR. BUCKLEY: Don't cut her off. Let her
5 finish her answer.

6 A. He stated -- this is when I said to him: Do
7 not talk to me that way. I don't work for you. You
8 may talk to your staff like that, but you're not going
9 to talk to me like that.

10 And he -- he -- before or after that had
11 stated: "I am CASA, I started CASA," which was not my
12 understanding to be correct, but he is very
13 instrumental in the juvenile court and has -- anyway.
14 So I said, Do not speak to me that way.

15 And he said, Well, you're either for me or
16 against me, and if you're against -- I don't -- I
17 wouldn't advise being against me.

18 And I said -- and then that's when I said, Do
19 not talk to me that way. You may talk to your
20 employees that way, but you're not going to talk to me
21 that way.

22 And that's when he brought up the fact that
23 Heritage would be under -- or I don't know if he said
24 "Heritage," or "we," but I can't 100 percent say if he
25 said the word "you" or "Heritage" would be under a

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1 federal investigation for the misuse of the donation
2 of the car. And I'm, like, you don't even know, like,
3 what, or how we reported that but that, you know, like
4 that was crazy.

5 And it got a little heated, and that's when
6 Debbie stepped in and said, Okay, okay, okay, come on,
7 y'all, and let's -- let's just end this conversation.
8 And so we did.

9 Q. So about that car donation, during that
10 conversation didn't Judge Teske tell you that he had
11 heard rumors about the donation not being done
12 appropriately?

13 A. No, I don't think so.

14 Q. In the context of -- well, you understood that
15 the -- the -- the reference to --

16 A. I mean --

17 Q. -- there could be a federal investigation, you
18 understand that to be a threat; correct?

19 A. Oh, absolutely.

20 Q. Okay.

21 A. I didn't even know where that come from,
22 because the -- I mean, it clearly caught me off guard
23 that he would even bring that up. I -- I was
24 flabbergasted by the fact that we were talking --
25 we're talking about a board meeting with Friends of

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1 Clayton County CASA, the next thing I know you're
2 either for me or you're against me conversation.

3 So I -- you know, I don't know where that came
4 from.

5 And so, obviously, between the two of us the
6 conversation got heated, because I said you're not --
7 don't -- don't threaten me, and don't talk to me that
8 way, and.

9 Q. Mm-hmm (affirmative). Well, so when you say
10 you don't know where that came from, you mean like you
11 don't know what information he was acting on?

12 A. No. No, I don't -- I don't even know where he
13 would remotely think to bring up something as absurd
14 as that.

15 Q. Okay. Would you agree that it's appropriate
16 for him to be concerned about potential legal issues
17 with a donated prize at a CASA program?

18 MR. BUCKLEY: Objection to the form.

19 A. There was no indication whatsoever for him to
20 even remotely think that there was a problem with a
21 donation of a car.

22 BY MR. HILL:

23 Q. But you don't know what he heard; right? You
24 don't know what --

25 A. He didn't imply that he heard anything.

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1 Q. Okay.

2 A. He just stated I'm either for him or I'm
3 against him, and I -- and it's not going to be in my
4 best interest to be against him, there'd be a federal
5 investigation over the car.

6 And I'm like, whoa, where did -- I don't even
7 know where you're -- what, what?

8 Q. But there never was a federal investigation --

9 A. No.

10 Q. -- regarding that car? Okay. Got it.

11 And -- oh. The statement "I am CASA, I
12 started CASA," since CASA is a court program, and he's
13 speaking to you as the court, those statements are
14 technically true; right?

15 MR. BUCKLEY: Object to the form.

16 A. That's not how I would vision that, no.

17 BY MR. HILL:

18 Q. Well, the court started CASA in Clayton
19 County?

20 A. Martha Glaze started CASA in Clayton County.
21 She was a previous judged that had retired. She's the
22 one that started the program.

23 Q. Okay. Right.

24 A. So a previous judge did.

25 Q. Right. Okay. Okay. Well, I -- the only

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1 reason I'm asking, I understand there is two types of
2 CASA organizations. There is some that are --
3 originate with the court, and then in some places it
4 might be originated with a nonprofit that then works
5 for the court; is that right?

6 A. I don't know --

7 Q. Okay.

8 A. -- that to be exact.

9 Q. Okay. Is it possible that that heated
10 conversation through the speaker phone when Debbie
11 Stinson called you, is it possible that that was the
12 conversation when Judge Teske got angry and made the
13 comment about the gay bar?

14 A. Definitely not.

15 Q. Okay.

16 A. That was during him letting me know he was
17 terminating Gerald in my office at the dealership.

18 Q. Okay. You're absolutely positive?

19 A. 100 percent positive.

20 Q. Got it. And the subsequent board meeting when
21 Judge Teske explained the reason for Mr. Bostock's
22 termination, you say in your statement the atmosphere
23 was pleasant; is that correct?

24 A. Yes.

25 Q. Okay. And how long did that meeting last?

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1 A. Not very long. I don't recall if we met over
2 anything else afterwards. It wasn't a very long
3 meeting.

4 Q. What did Judge Teske say during that meeting?

5 A. That they had discovered that there was a
6 misuse of funds by Gerald, and that he was terminated.
7 He was -- he did not go into an extreme amount of
8 detail during that meeting.

9 Q. Did -- am I right that no board member opposed
10 Mr. Bostock's termination?

11 A. I wouldn't say opposed. I think everybody was
12 like me, very shocked --

13 Q. Okay.

14 A. -- to hear the news. No one brought up
15 opposition in the board meeting, or -- it was -- it
16 was -- it was a pretty short meeting, and it was just
17 they took it all in.

18 They had obviously had already -- a lot of
19 talk had been going on already, you know how rumors
20 and people talking happen, because the termination had
21 already taken place, so.

22 Q. Mm-hmm (affirmative).

23 A. But I don't -- I don't recall any board
24 members bringing up any concerns or questioning Judge
25 Teske. They just all took it all in and listened.

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1 Q. Okay. No one said that's not true, he didn't
2 misuse funds?

3 A. I mean, I don't -- I don't recall anybody
4 disputing Judge Teske.

5 Q. No one accused Judge Teske of having fired
6 Mr. Bostock for being gay; right?

7 A. I don't recall anybody saying that.

8 Q. And I think I've asked, but Judge Teske did
9 not tell the board that he fired Mr. Bostock for being
10 gay; right?

11 A. No.

12 Q. Okay. Subsequent conversation that you
13 mentioned with John Johnson.

14 A. Right.

15 Q. You said this was right after that board
16 meeting?

17 A. Correct.

18 Q. In the parking lot?

19 A. Yes.

20 Q. How long did this last?

21 A. Not very long. Probably less than five
22 minutes.

23 Q. Do you consider yourself friends with John
24 Johnson?

25 A. Acquaintance.

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1 Q. Okay. He's not someone who would confide in
2 you; is that right?

3 A. No. It was kind of surprising he even was
4 making mention.

5 Q. Okay. Are you aware that he denies that this
6 conversation ever occurred?

7 A. I'm not aware of that.

8 Q. Would that surprise you at all?

9 A. It would surprise me in the context that it
10 definitely happened. We were on the sidewalk right
11 there by the parking lot right outside the door where
12 we have our board meetings. And he -- he said it.

13 And I quickly said, Well, I don't know why you
14 would continue to let it happen. That wouldn't happen
15 at my dealership. And it was a very quick
16 conversation, but it definitely took place.

17 Q. What did he -- what did he say -- when you say
18 that he -- I think you said the language he uses that
19 Mr. Johnson told you he knew what Gerald had been
20 doing for three years or so.

21 Anything more specific than that as far as
22 what he claimed, supposedly knew he had been doing?

23 A. No, because it wasn't much after that that I
24 said, Well, why would you let it continue to happen?
25 If this happened at my dealership, first time somebody

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1 spent money I didn't want them spending, they'd be in
2 my office.

3 And, I mean, I don't know if he wasn't --
4 expecting me to agree along with him and, I don't know
5 what the reason, but the conversation didn't continue
6 much after that.

7 Q. Okay. Is it possible that he said something
8 like: I had had concerns, or felt uncomfortable about
9 the oversight over that account for the past three
10 years?

11 A. No.

12 Q. Okay. It was just we knew what he had been
13 doing --

14 A. Right.

15 Q. -- something like that, vague like that?

16 A. Right.

17 MR. HILL: I've got two minutes
18 remaining. Let's -- if we could just take one
19 quick break, I think I might be done. I just
20 wanted to gather my thoughts.

21 MR. BUCKLEY: Okay.

22 THE VIDEOGRAPHER: Going off the video
23 record at 1:01.

24 (Recess 1:01 p.m. - 1:13 p.m.)

25 THE VIDEOGRAPHER: We're now back on the

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1 video record at 1:13. This is the start of
2 video file number three.

3 BY MR. HILL:

4 Q. Okay. Ms. Crawford, I just wanted to clean up
5 a couple of items.

6 You mentioned that after your resignation you
7 went to Heritage Bank to get some bank statements for
8 the GAL account; right?

9 A. Correct.

10 Q. And you reviewed about three years or so of
11 those statements; is that right?

12 A. Correct.

13 Q. Do you remember which years you reviewed?

14 A. I do not. But it, I assume, would be 2013 and
15 back. It wouldn't have been -- it would have been
16 somewhere around the time that it was being
17 questioned.

18 Q. Okay. So most likely -- as far as -- as far
19 as you remember, it's probably like the last three
20 years of Mr. Bostock's employment?

21 A. That would be my guess, yes.

22 Q. Okay. And then you had a conversation with a
23 board member about the bank statements after you
24 reviewed them?

25 A. I do not remember when.

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1 Q. Okay.

2 A. I don't remember.

3 Q. Well, you wouldn't have discussed -- well,
4 would you have dis- -- maybe this will help you
5 remember. I mean, were you talking about the bank
6 statements and what you saw in the bank statements
7 with this board member?

8 A. I cannot remember if it was information after
9 talking with staff about what she said was protocol
10 for writing on the bank statements that me and this
11 board member had a conversation about it, or if it was
12 after I saw the bank statements. Again, that was
13 2013.

14 Q. Okay.

15 A. Because the bank statements come up more than
16 once in conversation. It was when talking to Requel,
17 and she was stating that she had been given the bank
18 statements with notes about who and where, or maybe
19 even who the person is in the company; for example,
20 you know, Mary Smith, AT&T, or whatever, that that
21 would be written on the bank statements. And then I
22 after that went and got copies of the bank statements.

23 So I don't recall if the board meeting
24 conversation -- or the board member conversation was
25 after I heard what Requel said, or after I saw what I

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1 saw.

2 Q. Okay. But this was after your resignation
3 when you went to the -- when you got the bank
4 statements?

5 A. I think so.

6 Q. Okay.

7 A. The timing was pretty relative together when
8 all that was going on.

9 Q. Mm-hmm (affirmative).

10 A. If I had the statements, and then sent my
11 resignation in, I don't -- I don't remember.

12 Q. Do you remember which board member you're
13 referring to that you spoke to about the bank
14 statements?

15 A. So I know that Jane Glaze and I have spoke
16 about this issue, and I know that Sandra Henderson and
17 I have. I believe the -- the bank statement
18 conversation was with Jane.

19 Sandra and I talked about the issue, like:
20 Did you hear what was going on? Did you hear about
21 Gerald? Gerald come to see me. I said, Yes, he come
22 to see me, too. I don't recall Sandra and I having a
23 conversation at that point because that was pretty
24 early in the termination of when Gerald got
25 terminated, so.

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1 Q. Okay.

2 A. I can't swear that Sandra and I didn't have
3 another conversation, but, again, it's been so long.

4 Q. Okay. But it wouldn't be anyone else except
5 for Sandra Henderson, or Jane Glaze, or maybe both in
6 different conversations; right?

7 A. That I recall.

8 Q. Okay.

9 A. I don't even recall, like, after the board
10 meeting, us having any in-depth private conversations.
11 Everybody just kind of scattered afterwards.

12 Q. Okay. Just real quick on those events at
13 Chili's or Carrabba's when Judge Teske -- when you saw
14 Judge Teske tell Mr. Bostock to pick up the tab for
15 someone who left without paying, I may have asked
16 this, but you don't have any knowledge of which check
17 card he used; right?

18 A. I don't remember.

19 Q. Talking about Mr. Bostock?

20 A. No.

21 Q. You don't remember? Okay.

22 A. I don't. I mean, I think -- I'm not going to
23 say that over -- that all those years that we didn't
24 use a combination of. It may have very well have been
25 the Friends of Clayton County CASA, and it could have

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1 very well have been the GAL. I mean, my guess is is
2 that it was a combination of both, but I can't swear
3 to how much and when and how often --

4 Q. Okay.

5 A. -- between the two.

6 Q. Okay. And the meeting at your dealership with
7 Judge Teske and Colin Slay when they were giving you
8 the heads-up on Mr. Bostock's termination, that
9 meeting, and the -- the -- no one from the media ever
10 did contact you; correct?

11 A. Correct.

12 Q. Okay. And when you gave the written statement
13 that's Plaintiff's Exhibit 2 to Investigator Crenshaw,
14 I think you testified that you did not have any
15 knowledge as to why the district attorney was
16 interested in speaking with you; is that right?

17 A. Well, at the time -- I mean, I knew that there
18 was an investigation going on. I had heard that. And
19 I'm assuming they would want to know what I knew about
20 anything that could have happened.

21 Q. When you say you had heard there was an
22 investigation going on, exactly like what did you
23 hear?

24 A. I don't know if that was the criminal, you
25 know, where they were trying to -- the district

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1 attorney trying to bring charges up against Gerald in
2 relation to the misuse of funds.

3 Q. Okay.

4 A. I'm assuming that's the time when Investigator
5 Crenshaw had asked me for my --

6 Q. Okay.

7 A. -- my input. But I don't -- I don't know the
8 dates of when they were trying to prosecute Gerald
9 other than after he was terminated.

10 Q. Okay. But sitting here today, you do not know
11 why the district attorney wanted to speak -- or the
12 Investigator Crenshaw wanted to speak with you; right?

13 A. Well, other -- other than I was the board
14 chair, and I may have information as to if -- if there
15 was misappropriation of funds, that would be the
16 reason why he would want to question me.

17 Q. Okay. Did he ask you to write this statement?

18 A. He did. He asked me would I put it in
19 writing. And I said Yes, I would.

20 Q. With your charitable organization, the current
21 one, GiGi's House, Judge Teske has assisted you in
22 some matters related to GiGi's House; is that correct?

23 A. Yes. He's the juvenile -- I mean, being the
24 juvenile court judge, and I serve -- and I serve
25 juveniles, teen girls 13 to 19.

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1 Q. Okay. So you and Judge Teske, would it be
2 fair to say, you do not have any, like, bad blood
3 between you two?

4 A. No. And I feel like that that situation
5 definitely got out of control, and it was unfortunate.
6 We have -- you know, I do not believe on either side
7 there is any real ill feelings on either side, him nor
8 I.

9 Q. Okay. You agree that he, in your opinion he
10 does a good job as the chief juvenile court judge?

11 A. I mean, I don't know that I'm qualified --
12 MR. BUCKLEY: Object to the form.

13 A. -- to -- to make a statement like that. I
14 think he's done a lot for our community and reform --
15 BY MR. HILL:

16 Q. Mm-hmm (affirmative).

17 A. -- for juveniles getting out of jail, I know
18 he's been very instrumental. I think he's a very
19 well-respected judge. For me to say does he do a good
20 job, I mean, I don't know that I -- that I'm qualified
21 to make that determination.

22 I think he's very well respected by the
23 judicial system.

24 Q. Okay. Yeah. I didn't mean, like, as a
25 lawyer, if you think he's doing -- obviously, I know

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1 you're -- you're -- you're not an attorney, so, I'm
2 not -- I just mean as a person as a person, as someone
3 who's lived in Clayton County?

4 A. I don't -- I mean, I think that he's respected
5 in the juvenile court system.

6 Q. Okay.

7 A. I've seen him be very fair and -- in the court
8 and advocate for youth to get, you know, what they
9 need to get back into society. And I think that he
10 has tried to make sure that his position as a judge
11 has helped teens get back to where they need to be,
12 and...

13 Q. Okay. To go back to the board meeting that
14 you mention in the written statement where Mr. Bostock
15 mentions the potential sponsorship of the softball
16 team?

17 A. Mm-hmm (affirmative).

18 Q. So, I mean, you said he -- the board did
19 not -- I believe you're saying the board did not vote
20 on whether or not to approve the softball team
21 sponsorship; correct?

22 A. I -- I do not recall of any time ever being
23 asked for us to determine the funds that the court
24 takes in that's considered GAL money, for the -- the
25 -- the board to make the decision on how that money is

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1 spent. That's determined by the Memorandum of
2 Understanding.

3 Q. Right.

4 A. However, every single board meeting Gerald
5 always gave the board updates on what he was doing as
6 the director, who he was meeting with, what he was
7 trying to do from a fundraising, increasing the
8 volunteer pool, bringing on more guardian ad litem to
9 the program. He would always update the board on
10 stats and where we were with the number of children
11 being served.

12 Q. Mm-hmm (affirmative).

13 A. The number of volunteers that we currently
14 have, and then some of the things that he was doing to
15 help grow the program.

16 Q. Okay. All I'm really asking is was he a --
17 your recollection of the board meeting, Mr. Bostock
18 was informing the board that he was going to be
19 sponsoring the softball team; correct?

20 A. Correct. He let us know. He let the board
21 know that he was doing that.

22 Q. Okay. He was not asking permission to do
23 that; is that right?

24 A. That's not my recollection of it.

25 Q. Okay. Your rec- -- yeah, it is not your

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1 recollection that he was asking --

2 A. For permission.

3 Q. -- for permission or approval; right?

4 A. Correct.

5 Q. Okay. And any -- did any board members voice
6 any kind of opposition, or say we don't think that's a
7 good idea, during that board meeting?

8 A. No.

9 Q. No one at all?

10 A. No.

11 MR. HILL: All right. I think that's it.

12 FURTHER EXAMINATION

13 BY MR. BUCKLEY:

14 Q. All right. I have a few.

15 Colin Slay, do you recall him saying anything
16 in the meeting in your office?

17 A. No, I don't believe he did.

18 Q. Okay.

19 A. He was very quiet. Judge Teske --

20 Q. Okay.

21 A. -- mostly spoke.

22 Q. When Judge Teske called you up, you know, and
23 as Mr. Hill made emphasis, he was calling you in his
24 judicial capacity, and he threatened your dealership,
25 said that you're either with me or you're against me,

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1 and threatened your -- you and your dealership with an
2 IRS investigation, did you feel like you were being
3 blackmailed?

4 MR. HILL: Object to form.

5 A. I don't know if "blackmailed" was the right
6 term. Threatened that if I didn't do what it was he
7 wanted me to do maybe. Could you look at that as
8 blackmail? I don't know.

9 I didn't -- I don't know that I necessarily
10 would have thought of blackmail. I looked at it more
11 as you're -- you're thinking you have the right to
12 talk to me that way and say those things, and you do
13 not.

14 Q. Right.

15 A. You -- you can't threaten me. For one, I knew
16 we did nothing wrong, so his threats did not scare me.
17 But it was inappropriate.

18 Q. Okay. But he was threatening you with a
19 criminal investigation; right?

20 A. Correct.

21 Q. Okay. The GAL funds, the intent behind the
22 MOU, as you understood it, was that they were not
23 re- -- I mean, how they were used to perform
24 CASA-related functions was not restricted, it was very
25 broad, the discretion that Gerald had?

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1 A. Yes.

2 Q. Now, you had a -- you were asked a number of
3 questions about as to, you know, basically whether or
4 not the fact that there were expenses that Gerald
5 incurred in gay bars, that that was somehow purely
6 social.

7 Is there any reason that you know of why an
8 expenditure in a gay bar, particularly where he's
9 recruiting members of his softball team, could be --
10 could not be business related?

11 A. We never questioned or felt like that they
12 were not appropriate.

13 Q. All right. You didn't think he --

14 A. Where they were was --

15 Q. When you saw them, you didn't -- you didn't
16 think, oh, this must be purely for social reasons
17 because Gerald is gay?

18 A. No, I did not think that.

19 Q. All right. And, in fact, the assumption that
20 such expenses would be for purely social reasons is
21 based on a sexual stereotype, isn't it?

22 MR. HILL: Objection. Object to form.

23 A. Can you rephrase the question? Like, what are
24 you asking?

25 BY MR. BUCKLEY:

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1 Q. Sure. I mean, the assumption that if he was
2 spending money in a gay bar, if he was spending
3 CASA-related funds in a gay bar, it must have been
4 strictly for social reasons is an assumption based on
5 the fact that Gerald is gay, isn't it?

6 MR. HILL: Object to the form.

7 A. I would not have assumed that.

8 BY MR. BUCKLEY:

9 Q. All right.

10 A. To me, I think you can question someone if
11 they're spending the money properly regardless of
12 where it is.

13 Q. Of course.

14 A. As a -- an owner of a -- of a business, if my
15 employees go to spend money, I question the reason
16 behind it, and then I approve it, or -- and reimburse
17 them and we move on. If I don't approve it, they --
18 they know not to spend the money that way again.

19 Q. Okay.

20 A. I think you can question someone if they're
21 spending the money properly or not; whether it's at a
22 gay bar or a straight bar shouldn't -- doesn't matter
23 in the way I look at it.

24 Q. Okay. Now, under the term of the MOU, you
25 know, Mr. Hill asked you questions about did Gerald

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1 ask if he could have these funds used, the GAL funds
2 used, for sponsoring the Honey Badger softball team,
3 or did he just tell you?

4 A. So from what I remember from our board
5 meetings, when we talked about GAL money it was under
6 the discretion of the director to spend it based on
7 the MOU.

8 Q. Okay. Right.

9 A. So our board was alerted. We were clued in.
10 Just like I would tell them what I was doing to try to
11 recruit --

12 Q. Mm-hmm (affirmative).

13 A. -- so was Gerald.

14 Q. Right.

15 A. And we went on the understanding that the
16 court saw what he did and there was a Memorandum of
17 Understanding that allowed him to do so.

18 Q. Right. Okay.

19 A. And from what I remember, I don't remember it
20 being our authority to deny those claims because there
21 was a Memorandum of Understanding by a judge.

22 Q. And as you understood the Memorandum of
23 Understanding, if Gerald thought that sponsoring the
24 softball team would serve CASA's interests in terms of
25 recruiting, or finding help for the program, that was

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1 within his discretion to do, and he didn't have to
2 necessarily ask permission; correct?

3 A. Correct. Because it talks about marketing in
4 here as well, if I recall --

5 Q. Okay.

6 A. -- or recruitment. And that's what you're
7 doing.

8 Q. Okay.

9 A. That conversation come up at our board
10 meeting. If we, any of us, thought that was
11 inappropriate, we would have brought it up then --

12 Q. Sure.

13 A. -- and we did not.

14 Q. Right. And nobody did, to your knowledge?

15 A. Nobody did.

16 Q. You said Judge Teske likes to be in the
17 spotlight?

18 A. That's his personality.

19 Q. Mm-hmm (affirmative). So he likes to be in
20 the media spotlight?

21 A. That would have -- that would have been my
22 guess as to why he would have agreed to have done
23 the --

24 Q. Did you read the recent AJC article in which
25 he accused Gerald of misappropriation of funds?

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1 A. I have not seen a recent article.

2 Q. Okay. All right. The Friends of Clayton
3 County CASA board is independent of the juvenile
4 court, and not under the supervision of the juvenile
5 court; correct?

6 A. Correct.

7 Q. And by the same token, you know, when you were
8 asked -- when Judge Teske came and told the board that
9 he was terminating Gerald, you were asked whether the
10 board, any of the board members opposed the
11 termination. The board didn't have authority to
12 oppose the termination; right?

13 A. Correct.

14 Q. Okay.

15 A. They -- they couldn't. It wouldn't have
16 mattered what they said.

17 Q. They were not a decision maker, and couldn't
18 be a decision maker in whether or not Gerald was hired
19 or fired by Clayton County?

20 A. Correct. We had no authority whatsoever.

21 Q. In that meeting do you recall the reason or
22 reasons that Judge Teske gave for firing Gerald?

23 A. I believe it was the verbiage of misuse of
24 funds.

25 Q. Okay. All right. Did he mention in that

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1 meeting the fact that he was spending monies in a gay
2 bar, or that he spent monies on putting the CASA logo
3 on the softball team T-shirt?

4 A. I do not remember him stating that.

5 Q. Okay.

6 A. I'm not going to say he did or didn't. I
7 don't remember.

8 Q. He just broadly said he had misused funds?

9 A. Correct.

10 Q. Did he characterize them as being used for
11 personal purposes?

12 A. I don't remember.

13 Q. Did he characterize -- when he said misused,
14 did he -- did he use the word stolen? You said that
15 you heard the word stolen later on.

16 A. Yeah. I know that --

17 MR. HILL: Objection, mischaracterizes
18 witness's testimony.

19 BY MR. BUCKLEY:

20 Q. Go ahead.

21 A. So the conversation had took place, and if I
22 recall it was more surrounded by the fact that I was
23 stating, Well, I saw the bank statements myself and I
24 did not see anything.

25 And that's when it was brought up: Yeah, but

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1 now they're saying it was actually cash that was
2 stolen. I'm like, Well, I wouldn't have known that by
3 seeing the statements.

4 Q. Right.

5 A. But, no, I do not recall him going into
6 detail --

7 Q. Okay.

8 A. -- stating stolen. I'm not saying he didn't.
9 I'm not saying he did.

10 Q. Okay.

11 A. I don't recall.

12 Q. All right.

13 A. I remember the meeting being brief.

14 Q. When he said misuse, he did not characterize
15 the type of misuse. In other words, he didn't say he
16 spent it for X, Y and Z, and that's an inappropriate
17 misuse of funds?

18 A. I don't believe so.

19 Q. Okay.

20 A. Not at the board meeting.

21 Q. Okay. He -- so and the only -- and the only
22 occasion where he was specific about misuse of funds,
23 to your recollection, is when he complained about him
24 spending money in a gay bar; right?

25 A. In my office.

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1 Q. Okay.

2 A. That day with Colin.

3 Q. All right. Thank you.

4 A. Mm-hmm (affirmative).

5 MR. BUCKLEY: That's all I have.

6 FURTHER EXAMINATION

7 BY MR. HILL:

8 Q. Ms. Crawford, if we -- going to ask you a
9 hypothetical question, and I want to know what you
10 think.

11 A. Okay.

12 Q. Okay. Let's say take a gay bar, let's take
13 that out of the equation for a second. Let's say that
14 you are reviewing the expenses for a Clayton County
15 employee who is racking up a lot of expenses at bars
16 and restaurants in Midtown Atlanta, not necessarily
17 gay bars, just any, okay? A lot of expenses at
18 locations in Midtown Atlanta, and he claims that the
19 expenses were for recruiting volunteer guardian ad
20 litem, and yet there is, like, no guardian ad litem
21 volunteers coming out of these meetings. Would you
22 agree that that might look suspicious?

23 MR. BUCKLEY: Object to the form, assumes
24 facts not in evidence.

25 A. You're asking me to answer you hypothetically,

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1 and I'm going to answer you as a business owner.

2 BY MR. HILL:

3 Q. Okay.

4 A. Three years of bank statements.

5 Q. Mm-hmm (affirmative).

6 A. As a supervisor you're looking at them.

7 Q. Mm-hmm (affirmative).

8 A. Why didn't you ask after the first month? You
9 just spent X amount of money that's not within your
10 authority. Don't do that again.

11 So the answer to your question is if you as a
12 supervisor give authority with a Memorandum of
13 Understanding to one of your employees, and they are
14 not within that Memorandum of Understanding, your job
15 as their supervisor is to pull them in your office and
16 say I have given you a debit card, you have a
17 Memorandum of Understanding, but you're not abiding by
18 that Memorandum of Understanding, I want to make clear
19 to you what I expect for you to use those funds for.

20 Q. Mm-hmm (affirmative).

21 A. And then from there that employee should move
22 forward and spend the money just the way their
23 supervisor laid out.

24 Instead, the court's got bank statements every
25 single month for at least, that I know of, three

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1 years -- because I looked at it for three years -- and
2 never questioned, supposedly, that it was not being
3 done based on the Memorandum of Understanding.

4 I put that back on the court. They -- the
5 supervisors of the court who allowed him to have a
6 debit card, but then later said he isn't spending the
7 money correctly --

8 Q. Mm-hmm (affirmative).

9 A. -- but yet they were getting the bank
10 statements, are at fault. If they didn't like it
11 being in Midtown at a gay bar, or at Waffle House, or
12 Atlanta Motor Speedway, an executive that is in a
13 different county than Clayton, if they didn't like
14 that, they should have let him know.

15 But a person, including me, would be going by
16 this Memorandum of Understanding. It does not lay out
17 what not to do and where to do it.

18 So if you as a supervisor are seeing where
19 your employee is spending money, and you don't like
20 it, and it's not within the parameters of what you're
21 giving them, you tell them that. And if they do it
22 again, they're fired, or they're reprimanded, or
23 whatever -- whatever you want to do as an employer.

24 Q. All right.

25 A. But you let it go on, which means you're

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1 accepting it.

2 Q. So are you saying that you would agree it's
3 suspicious, or are you not saying it's suspicious?

4 MR. BUCKLEY: Object to the form.

5 A. I agree that when you allow it to go on month
6 after month after year after year, then you're not
7 suspecting it's wrong or suspicious. You're allowing
8 it.

9 BY MR. HILL:

10 Q. That's not my question.

11 A. So, no, it's not suspicious.

12 Q. Just TO make sure I get this clear. If you
13 have three years of bank statements --

14 A. Mm-hmm (affirmative).

15 Q. -- with expenses in Midtown Atlanta that are
16 not in Clayton County, three years' worth, and no
17 guardian ad litem volunteers, zero, coming out of
18 these meetings, would you not think it's a fair
19 assumption that these might have actually just been
20 social outings?

21 A. No. Because you -- you cannot pinpoint how
22 many duck sale tickets were purchased out of that.
23 There were sponsorships other than a Clayton County
24 sponsor. And we sold 2,500 or 4,000 ducks every
25 single year that nobody can say wasn't -- was not

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1 people out of Clayton County.

2 And so just to say -- it was more than just
3 recruiting volunteers. It was bringing light to
4 people about the program and what we do and why we do
5 it. It is recruiting volunteers, it was recruiting
6 funds, sponsorships, and even additional board
7 members.

8 Q. Mm-hmm (affirmative).

9 A. I mean, part of all of our job was to try to
10 make sure that we had competent board members that
11 would also pull the ropes and try to help raise funds
12 and recruit volunteers.

13 So just to say you can look at a list of GALs,
14 that nobody lived outside of Clayton County, or
15 Midtown, is -- is not even measurable because you're
16 -- you're only looking at one thing.

17 And it was stated in earlier conversation that
18 they agreed to help sell duck tickets, the softball
19 team. So in our meeting, in our board meeting, it was
20 stated that they want to help -- they want to help us
21 by selling duck tickets or getting the word out.

22 Just because you meet with a person to try to
23 get them to become a sponsor, or a guardian ad litem,
24 a volunteer, a board member don't mean they say yes.
25 That don't stop you from trying to go and keep

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1 recruiting and meeting with them.

2 I meet with -- I may meet with 50 people over
3 lunch trying to get funds for my nonprofit
4 organization. All 50 don't give me the funds, but you
5 don't stop trying. You still keep meeting, and
6 hopefully recruit board members and recruit funding to
7 support your program.

8 Q. When you say it was stated in an earlier
9 conversation, can you tell us who stated it and what
10 earlier conversation you're talking about?

11 A. Are you referring back to the sponsorship?

12 Q. I'm referring back to what you just said.

13 A. So, as I said before, in our board meetings
14 Gerald would update us on what he's doing, who he's
15 meeting with, who he's trying to recruit.

16 At that meeting he stated that his softball
17 team -- that he was going to sponsor the softball
18 team, and then in return the softball team was willing
19 to help sell duck tickets, recruit volunteers, and
20 help promote the program in any way they could.

21 It was kind of a tradeoff, hey, you help me,
22 we'll help you. But not only that, it also -- for
23 everybody that wore that T-shirt, Friends of Clayton
24 County CASA was on that T-shirt.

25 So we looked at it as a way of spreading the

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1 word no matter where that person may be. It might not
2 be --

3 Q. What T-shirt are you talking about?

4 A. The softball T-shirt.

5 Q. Okay.

6 A. So the name of the program was on the back of
7 the T-shirt. That's a way of advertising. That's a
8 way of getting people to hear more about us. Maybe
9 that person is in Clayton County, maybe they're in
10 Henry and they are wearing that shirt, but they're
11 advertising the program.

12 Q. You have no knowledge that the court was
13 actually reviewing these bank statements over the
14 years, do you?

15 A. The only information I have is that Requel
16 stated that she turned those bank statements in every
17 month, and that they had notes on the bank statement
18 as to who and what organization would be written
19 beside.

20 Now, of course, the bank statements that I
21 went and got at the bank is not going to have his
22 writing on it. But based on what I'm being -- I was
23 told by staff is that it was protocol to turn the bank
24 statements in with writing that said who and what
25 company, assuming they belong to a company, that you

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1 were recruiting, you know, someone from -- that was
2 tied to a company, not just an individual.

3 Q. When you say told by staff, you're talking
4 about Requel; correct?

5 A. Correct.

6 Q. Nobody else?

7 A. I do not believe so, no. I don't believe ever
8 having that conversation with anybody other than her.

9 Q. Okay. And when she says she turned the
10 statements in, to whom was she turning them in?

11 A. Gosh, I'm trying to remember if it was Colin
12 or John, but it would, I believe, have been one of the
13 two.

14 Q. Okay. But you don't have any knowledge as to
15 whether Colin or John reviewed the bank statements?

16 A. I can't. I can't attest to what they did with
17 them.

18 Q. Okay. Would you describe yourself as good
19 friends with Mr. Bostock?

20 A. I believe us to have been -- to be friends,
21 yes.

22 Q. Closer than you would be with Judge Teske?

23 A. I spent more time with Gerald than I did Judge
24 Teske. I mean, we were out in the field together
25 putting together Duck Derby. I respected Gerald. I

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1 respect Judge Teske. We were not friends going out to
2 dinner and places after hours. It was definitely a
3 friendship that come from us both serving the CASA
4 program.

5 Q. Mm-hmm (affirmative).

6 A. Did we do things other than anything related
7 to CASA? No.

8 Q. Okay. You did not go out -- excuse me. You
9 did not go out with him, like, socially to events?

10 A. No. He had a -- he had a Christmas party, or
11 I believe it was Christmas -- he had a party at his
12 house one time, and the board, I believe volunteers,
13 staff, were all invited to. I don't remember
14 everybody that was there, but I went to that event.

15 And then other than that it would just
16 primarily be us either meeting a potential sponsor, a
17 volunteer, maybe over lunch or coffee, but nothing,
18 nothing like going out to dinner just, you know, the
19 two of us, or four of us or anything like that that I
20 can remember.

21 Q. Okay. When was the Christmas party that
22 you're referring to?

23 A. Oh, I do not even remember. It would have --
24 it would have been during the time I was on the board,
25 though.

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1 Q. Okay. Would it be, like, several years before
2 2013?

3 A. Oh, I couldn't even begin to remember.

4 Q. Okay.

5 A. It was not after. It was while --

6 Q. Yeah.

7 A. -- I was serving on the board.

8 Q. Do you remember if you had been on the board a
9 long time?

10 A. I don't remember.

11 Q. Okay. Do you remember if Judge Teske was at
12 that party?

13 A. I do not remember. I remember there being
14 some staff there. I just don't remember who.

15 Q. Okay.

16 A. I remember several board members were there,
17 but.

18 Q. Okay. Do you remember if Mr. Bostock had,
19 like, a romantic partner at the party?

20 A. I don't remember.

21 Q. Okay.

22 A. I can't even remember now if it was a
23 Christmas party. I just remember it being a
24 get-together. But as far as like socially, there was
25 no --

Sabrina Crawford - February 19, 2021
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1 Q. Only one Christmas party, or more than one?

2 A. -- that I can recall, yes, just once.

3 MR. HILL: All right. That's all I have.

4 MR. BUCKLEY: All right. We have no
5 further questions.

6 (To reporter) I want to make sure you get
7 the Exhibits.

8 THE VIDEOGRAPHER: This concludes the
9 video deposition at 1:45.

10 (Off video record.)

11 REPORTER: I need to know what to
12 indicate on the record about signature,
13 Counsel.

14 (Off the record.)

15 THE WITNESS: I'll waive.

16 MR. BUCKLEY: She waives.

17 (Deposition concluded at 1:47 p.m.)

18 (Signature waived.)

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Video Deposition

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C E R T I F I C A T E

STATE OF GEORGIA:

DEKALB COUNTY:

I hereby certify that the foregoing transcript was taken down, as stated in the caption, and the questions and answers thereto were reduced to the written page under my direction; that the foregoing pages 1 through 176 represent a true and correct transcript of the evidence given.

I further certify that I am not of kin or counsel to the parties in the case; am not in the regular employ of counsel for any of said parties; nor am I anywise interested in the result of said case. The witness did not reserve the right to read and sign the transcript.

This, 3rd day of March, 2021.



MAUREEN S. KREIMER, CCR-B-1379
Notary Public in and for the
State of Georgia. My Commission
Expires August 14, 2024.

Video Deposition

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DISCLOSURE

STATE OF GEORGIA:
COUNTY OF DEKALB:

Deposition of SABRINA CRAWFORD

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:

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Date: 02/19/2021

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Bostock v.
Clayton County

Video Deposition

Sabrina Crawford
February 19, 2021

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AO 88A (Rev. 12/20) Subpoena to Testify at a Deposition in a Civil Action

UNITED STATES DISTRICT COURT

for the

Northern District of Georgia



GERALD LYNN BOSTOCK

Plaintiff

v.

CLAYTON COUNTY

Defendant

Civil Action No. 1:16-cv-01460-ELR-WEJ

SUBPOENA TO TESTIFY AT A DEPOSITION IN A CIVIL ACTION

To:

Sabrina Crawford

(Name of person to whom this subpoena is directed)

Testimony: YOU ARE COMMANDED to appear at the time, date, and place set forth below to testify at a deposition to be taken in this civil action. If you are an organization, you must promptly confer in good faith with the party serving this subpoena about the following matters, or those set forth in an attachment, and you must designate one or more officers, directors, or managing agents, or designate other persons who consent to testify on your behalf about these matters:

Table with 2 columns: Place (Buckley Beal LLP, 600 Peachtree Street, N.E., Suite 3900, Atlanta, GA 30308) and Date and Time (02/19/2021 at 10:00 a.m.)

The deposition will be recorded by this method: Stenography and video recording

Production: You, or your representatives, must also bring with you to the deposition the following documents, electronically stored information, or objects, and must permit inspection, copying, testing, or sampling of the material:

The following provisions of Fed. R. Civ. P. 45 are attached – Rule 45(c), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e) and (g), relating to your duty to respond to this subpoena and the potential consequences of not doing so.

Date: 01/28/2021

CLERK OF COURT

OR

Signature of Clerk or Deputy Clerk

Attorney's signature

The name, address, e-mail address, and telephone number of the attorney representing (name of party) Plaintiff Gerald Lynn Bostock, who issues or requests this subpoena, are: Edward D. Buckley; Buckley Beal LLP, 600 Peachtree St., NE, Suite 3900, Atlanta, GA 30308; edbuckley@buckleybeal.com; (404)781-1100

Notice to the person who issues or requests this subpoena

If this subpoena commands the production of documents, electronically stored information, or tangible things before trial, a notice and a copy of the subpoena must be served on each party in this case before it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).

AO 88A (Rev. 12/20) Subpoena to Testify at a Deposition in a Civil Action (Page 2)

Civil Action No. 1:16-cv-01460-ELR-WEJ

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)

I received this subpoena for *(name of individual and title, if any)* _____
on *(date)* _____ .

I served the subpoena by delivering a copy to the named individual as follows: _____

_____ on *(date)* _____ ; or

I returned the subpoena unexecuted because: _____

Unless the subpoena was issued on behalf of the United States, or one of its officers or agents, I have also
tendered to the witness the fees for one day's attendance, and the mileage allowed by law, in the amount of
\$ _____ .

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ _____ 0.00 .

I declare under penalty of perjury that this information is true.

Date: _____

Server's signature

Printed name and title

Server's address

Additional information regarding attempted service, etc.:

Federal Rule of Civil Procedure 45 (c), (d), (e), and (g) (Effective 12/1/13)**(c) Place of Compliance.**

(1) For a Trial, Hearing, or Deposition. A subpoena may command a person to attend a trial, hearing, or deposition only as follows:

- (A) within 100 miles of where the person resides, is employed, or regularly transacts business in person; or
 (B) within the state where the person resides, is employed, or regularly transacts business in person, if the person
 (i) is a party or a party's officer; or
 (ii) is commanded to attend a trial and would not incur substantial expense.

(2) For Other Discovery. A subpoena may command:

- (A) production of documents, electronically stored information, or tangible things at a place within 100 miles of where the person resides, is employed, or regularly transacts business in person; and
 (B) inspection of premises at the premises to be inspected.

(d) Protecting a Person Subject to a Subpoena; Enforcement.

(1) Avoiding Undue Burden or Expense; Sanctions. A party or attorney responsible for issuing and serving a subpoena must take reasonable steps to avoid imposing undue burden or expense on a person subject to the subpoena. The court for the district where compliance is required must enforce this duty and impose an appropriate sanction—which may include lost earnings and reasonable attorney's fees—on a party or attorney who fails to comply.

(2) Command to Produce Materials or Permit Inspection.

(A) *Appearance Not Required.* A person commanded to produce documents, electronically stored information, or tangible things, or to permit the inspection of premises, need not appear in person at the place of production or inspection unless also commanded to appear for a deposition, hearing, or trial.

(B) *Objections.* A person commanded to produce documents or tangible things or to permit inspection may serve on the party or attorney designated in the subpoena a written objection to inspecting, copying, testing, or sampling any or all of the materials or to inspecting the premises—or to producing electronically stored information in the form or forms requested. The objection must be served before the earlier of the time specified for compliance or 14 days after the subpoena is served. If an objection is made, the following rules apply:

(i) At any time, on notice to the commanded person, the serving party may move the court for the district where compliance is required for an order compelling production or inspection.

(ii) These acts may be required only as directed in the order, and the order must protect a person who is neither a party nor a party's officer from significant expense resulting from compliance.

(3) Quashing or Modifying a Subpoena.

(A) *When Required.* On timely motion, the court for the district where compliance is required must quash or modify a subpoena that:

- (i) fails to allow a reasonable time to comply;
 (ii) requires a person to comply beyond the geographical limits specified in Rule 45(c);
 (iii) requires disclosure of privileged or other protected matter, if no exception or waiver applies; or
 (iv) subjects a person to undue burden.

(B) *When Permitted.* To protect a person subject to or affected by a subpoena, the court for the district where compliance is required may, on motion, quash or modify the subpoena if it requires:

(i) disclosing a trade secret or other confidential research, development, or commercial information; or

(ii) disclosing an unretained expert's opinion or information that does not describe specific occurrences in dispute and results from the expert's study that was not requested by a party.

(C) *Specifying Conditions as an Alternative.* In the circumstances described in Rule 45(d)(3)(B), the court may, instead of quashing or modifying a subpoena, order appearance or production under specified conditions if the serving party:

- (i) shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship; and
 (ii) ensures that the subpoenaed person will be reasonably compensated.

(e) Duties in Responding to a Subpoena.

(1) Producing Documents or Electronically Stored Information. These procedures apply to producing documents or electronically stored information:

(A) *Documents.* A person responding to a subpoena to produce documents must produce them as they are kept in the ordinary course of business or must organize and label them to correspond to the categories in the demand.

(B) *Form for Producing Electronically Stored Information Not Specified.* If a subpoena does not specify a form for producing electronically stored information, the person responding must produce it in a form or forms in which it is ordinarily maintained or in a reasonably usable form or forms.

(C) *Electronically Stored Information Produced in Only One Form.* The person responding need not produce the same electronically stored information in more than one form.

(D) *Inaccessible Electronically Stored Information.* The person responding need not provide discovery of electronically stored information from sources that the person identifies as not reasonably accessible because of undue burden or cost. On motion to compel discovery or for a protective order, the person responding must show that the information is not reasonably accessible because of undue burden or cost. If that showing is made, the court may nonetheless order discovery from such sources if the requesting party shows good cause, considering the limitations of Rule 26(b)(2)(C). The court may specify conditions for the discovery.

(2) Claiming Privilege or Protection.

(A) *Information Withheld.* A person withholding subpoenaed information under a claim that it is privileged or subject to protection as trial-preparation material must:

- (i) expressly make the claim; and
 (ii) describe the nature of the withheld documents, communications, or tangible things in a manner that, without revealing information itself privileged or protected, will enable the parties to assess the claim.

(B) *Information Produced.* If information produced in response to a subpoena is subject to a claim of privilege or of protection as trial-preparation material, the person making the claim may notify any party that received the information of the claim and the basis for it. After being notified, a party must promptly return, sequester, or destroy the specified information and any copies it has; must not use or disclose the information until the claim is resolved; must take reasonable steps to retrieve the information if the party disclosed it before being notified; and may promptly present the information under seal to the court for the district where compliance is required for a determination of the claim. The person who produced the information must preserve the information until the claim is resolved.

(g) Contempt.

The court for the district where compliance is required—and also, after a motion is transferred, the issuing court—may hold in contempt a person who, having been served, fails without adequate excuse to obey the subpoena or an order related to it.



**OFFICE OF THE DISTRICT ATTORNEY
CLAYTON JUDICIAL CIRCUIT**

Investigative Summary

D.A. 13-06-008

On Friday, February 13, 2015, I meet with SABRIN CRAWFORD at her place of employment, Heritage Cadillac in Morrow, Georgia. She submitted to me a typed letter, detailing her involvement as the Chairperson on the CASA Board.

The letter briefly detailed a meeting between CRAWFORD, COLIN SLAY and JUDGE TESKE, where upon the allegations that BOSTOCK had taken between \$14,000-\$17,000 in GAL funds were discussed. It briefly detailed a called CASA board meeting, by JUDGE TESKE in order to brief the board about the employment status of BOSTOCK. CRAWFORD also mentioned in the letter the reason for her resignation.

During our discussion, CRAWFORD felt that BOSTOCK did not commit any criminal act(s) regarding the spending of GAL monies, and added that her only suggestion to BOSTOCK was that he should have received prior approval to all spending of GAL monies.

(Letter attached.)

ID Data:

Sabrina Crawford

Heritage Cadillac

7134 Jonesboro Road

Morrow, Ga 30260

770-884-6690

RE: 03-06-008
Page 2 of 2

Prepared by:

Allen L. Crenshaw

Deputy Chief Investigator

February 11, 2015

Re: Friends of Clayton County CASA

I was recruited approximately in 2005 by Monique Henderson to be a sponsor for the Clayton County CASA duck derby. From there, I became a volunteer and board member. During those years as board member, I was in attendance at many board meetings and functions. Board/committee meetings were held every other month, monthly and weekly. Monthly and weekly meetings were needed to prepare for the annual Duck Derby. During the official board meetings we discussed fund raising, potential board members, and advocating for CASA. Some items were discussion items and some required approval from the board. There was time allotted for Director discussion regarding any pertinent information that may be valuable to the board regarding staff or volunteers. Statistical data was shared with the board regarding caseloads. The board was made aware if there were any functions or pertinent information in relation to Georgia CASA. During those meetings, Gerald would share information regarding opportunities for additional sponsors or support for the FCCC board. On more than one occasion, he made the board aware that he had met with representatives of companies that may be interested in CASA/Friends of Clayton County CASA and their efforts to fund raise and provide awareness about CASA. I do not remember all, but believe that AT&T, Atlanta Motor Speedway and players from his softball team were among the organizations and people that Gerald was making contact with regarding CASA. Gerald made the board aware that he was going to sponsor his softball team. In return, the players, at least some, were willing to assist with ticket sales and or sponsorships. He said that CASA would be printed on the back of the shirts. He stated that the sponsorship was being paid with GAL funds. The board did not have to vote for this action. It was not FCCC board money.

During our annual fund raising events, we secured two recurring sponsors. Carrabbas and Chili's. Their sponsorship included complimentary food. Staff, volunteers, board members and sponsors were notified they would be responsible for their own alcohol. There were many occasions that did not happen. The board or GAL money would have to pay for a persons tab that was left unpaid. Colin Slay, John Johnson and Judge Teske were aware and approved for it to be paid out of the funds. I recall seeing Judge Teske drinking alcohol at the functions, but can not recall if Colin or John had alcohol.

I remained on the board from 2005 to 2013. Most of that time as the chairperson. I received a call, on a Friday I believe, requesting a meeting with Judge Teske sometime the earlier part of 2013. The meeting was requested to be held at my office at Heritage Cadillac. I met with Colin Slay and Judge Teske. Judge Teske let me know that I may be contacted by the media. The media had or would be interviewing Judge Teske and there could be a possibility that I may receive that same request. That did not happen. Judge Teske informed me that Gerald would be terminated that following Monday. He stated that Gerald had taken money from the GAL funds. The amount was somewhere around \$14,000-\$17,000. I asked was he sure? He stated yes, they had proof. I asked that CASA not be mentioned/portrayed as being involved due to the fact that GAL funds were not monitored by Friends of Clayton County CASA board. He said no. I asked could the interview not be aired due to the negativity and consequences for the CASA organization. He said no. I asked could Gerald be reprimanded instead of terminated until the theft was proven. He said no and slammed his hand down on my desk and said that the "monies were

spent at a gay bar". He stated that locks were being changed and Gerald would be terminated that Monday. He and Colin left my office and stated they would be back in contact with me. Although, I was not asked, I did not contact Gerald to let him know what was going on. That Monday or Tuesday, Gerald came by the dealership and asked had I heard what happened. I said yes. He said he was in shock. He asked me if I thought he had stolen the money. I said no. I told him that the only recommendation I would have made would have been that he got prior approval. He stated that he abided by the Memorandum of Understanding. He stated that his supervisors were aware of how the funds were being spent. He stated that bank statements including written explanations were given to John Johnson. I was also told by Raquel that she had given banks statements to John with explanation of the expenditures written on the statement. I obtained copies of the bank statements which I reviewed. The expenses did not reveal the amount of dining or entertainment that Judge Teske had revealed on the news media.

Within a few days, I was told that Judge Teske has issued a request to all board members for a meeting. I asked that the meeting be rescheduled. I was unable to attend. I received a call from Debbie Stinson regarding the meeting. Judge Teske was present during that call. I was on speaker speaking with Debbie. Judge Teske seemed upset that I had questioned why he was calling a meeting. Meetings with the board are to be requested by the board chair or co-chair. He was neither. The conversation got a little out of hand and Debbie did step in and calmed the situation down. During that call while on speaker in front of his staff, Judge Teske let me know that there would be a federal investigation. He let me know that I would be part of that investigation. He proceeded to tell me that "I need to understand that I am either with him or against him". He stated that "it would not be in my best interest to be against him". He stated "I am CASA". "I started CASA". "I say who, when and where regarding CASA". He again advised me that I needed to be with him. That money was taken and I was the board chair. I reminded him that neither I nor the board had any control of GAL monies. That was his and his staff's responsibility. I reminded him that I did not work for him and he does not have the right to talk to me that way. I told him that what he said was a threat and I did not appreciate that.

The board meeting did take place. Most board members were in attendance along with some staff including John Johnson, Judge Teske and Carol Gossett. The atmosphere was pleasant. Judge Teske did explain to the board the reason for Gerald's termination. Judge Teske asked that the board consider holding a position open for himself or someone from his staff. It was approved by the board. After the meeting, I was talking one on one with John Johnson. He told me that he knew Gerald had been doing this for three years or so. I asked then why didn't you stop it if you knew about it. He just shrugged his shoulder without offering an answer.

I resigned shortly afterwards. Due to my busy schedule, the fact that I felt it would take me actually resigning to get someone to step forward to take the board position, the manner of which I was spoken to by Judge Teske, the fact that I had people telling me that Judge Teske had been talking negatively about the dealership and myself, telling people he was going to have us investigated by the IRS for the Mitsubishi that was used as first place prize at the duck derby, the fact that I believe Judge Teske allowed CASA to be positioned negatively in the media for his personal gain, the fact that I believe Judge Teske did not have enough facts before he portrayed Gerald and the CASA organization in the media. I

**OFFICE OF THE DISTRICT ATTORNEY
CLAYTON JUDICIAL CIRCUIT**

Investigative Summary

S.I. Number 13-06-008

Attached are E-mail correspondence with SABRINA CRAWFORD.

ID Data:

Sabrina Crawford

sabrina@heritagecadillac.net

RE: SI 13-06-008
Page 2 of 2

Prepared by:

Allen L. Crenshaw

Deputy Chief Investigator

Indictment Unit

Approved by:

Paul Garland

Chief Investigator

Re: Interview
Sabrina Crawford
to:
Allen Crenshaw
02/10/2015 09:21 AM
Show Details

History: This message has been replied to.

I am available in the afternoon Wednesday, Thursday or Friday.

Good morning Mrs. Crawford...

I am in need of conversation with you some time this week. I need to speak with you regarding your role as a CASA Board Member.

Thank you,

Allen L. Crenshaw
Deputy Chief Investigator
Office of the District Attorney
Clayton Judicial Circuit
Harold R. Banke Justice Center
Fourth Floor
9151 Tara Boulevard
Jonesboro, Ga. 30236
770-477-4585 (Direct)
678-898-4807 (Cell)
770-477-4577 (Fax)



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Re: Interview
Sabrina Crawford
to:
Allen Crenshaw
02/10/2015 09:27 AM
Show Details

History: This message has been replied to.

Yes we can meet at the dealership.
1 or 2 tomorrow? I am pretty flexible tomorrow. I kept my calendar open because my husband is having knee surgery today. Wanted to be available if he needed me.

On Feb 10, 2015 9:23 AM, "Allen Crenshaw" <Allen.Crenshaw@co.clayton.ga.us> wrote:

Mrs. Crawford,

Great. I assume I can meet you at the dealership? What is the best time for you, morning or early afternoon? Tomorrow would be great for me.

Allen L. Crenshaw
Deputy Chief Investigator
Office of the District Attorney
Clayton Judicial Circuit
Harold R. Banke Justice Center
Fourth Floor
9151 Tara Boulevard
Jonesboro, Ga. 30236
770-477-4585 (Direct)
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Sabrina Crawford ---02/10/2015 09:21:33 AM---I am available in the afternoon Wednesday, Thursday or Friday. Good morning Mrs. Crawford...

From: Sabrina Crawford <sabrina@heritagecadillac.net>
To: Allen Crenshaw <Allen.Crenshaw@co.clayton.ga.us>
Date: 02/10/2015 09:21 AM
Subject: Re: Interview

I am available in the afternoon Wednesday, Thursday or Friday.

Good morning Mrs. Crawford...

I am in need of conversation with you some time this week. I need to speak with you regarding your role as a CASA Board Member.

Thank you,

Allen L. Crenshaw
Deputy Chief Investigator
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Re: Interview
Sabrina Crawford
to:
Allen Crenshaw
02/10/2015 09:21 AM
Show Details

History: This message has been replied to.

I am available in the afternoon Wednesday, Thursday or Friday.

Good morning Mrs. Crawford...

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Thank you,

Allen L. Crenshaw
Deputy Chief Investigator
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Interview

Allen Crenshaw to: sabrina@heritagecadillac.net
Cc: allen.crenshaw@co.clayton.ga.us

02/10/2015 09:17 AM

Good morning Mrs. Crawford...

I am in need of conversation with you some time this week. I need to speak with you regarding your role as a CASA Board Member.

Thank you,

Allen L. Crenshaw
Deputy Chief Investigator
Office of the District Attorney
Clayton Judicial Circuit
Harold R. Banke Justice Center
Fourth Floor
9151 Tara Boulevard
Jonesboro, Ga. 30236
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To: sabrina@heritagecadillac.net <sabrina@heritagecadillac.net>.
Cc:
Bcc:
Subject: Interview

Good morning Mrs. Crawford...

I am in need of conversation with you some time this week. I need to speak with you regarding your role as a CASA Board Member.

Thank you,

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Deputy Chief Investigator
Office of the District Attorney
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Memorandum of Understanding

Between

Superior Court of the State of Georgia for the County of Clayton

And

Clayton County CASA

MISSION STATEMENT

The Clayton County CASA program provides advocacy and intervention to abused and neglected children in foster care and relative care custody, as well as, Guardian Ad Litem services to children involved in custody disputes through commitment to the following program values:

- Competent professional staff
- Supportive environment for recruitment, training and retention of volunteers
- Opportunities for volunteers to form caring, committed, relationships with children and their families
- Provision of concise meaningful reports containing thoughtful well-reasoned recommendations that assist the Court in meeting the needs of the child

THE GOAL OF CLAYTON COUNTY CASA

To be an effective response to a growing need for children to have a voice in deprivation and custody dispute proceedings by recruiting, training and supporting CASA volunteers who advocate for the best interest of the child.

The Clayton County CASA program is organized as a division of the Clayton County Juvenile Court and is given authority to recruit, train, support, and supervise CASA volunteers who serve as advocates for children under both a Clayton County Superior Court Order and a Clayton County Juvenile Court Order.

Achieving the goal of the CASA/Guardian Ad Litem service to children involved in custody dispute proceedings requires the development of a working relationship between the Clayton County Superior Court and the Clayton County CASA program. This Memorandum of Understanding identifies and clarifies that relationship.

Section I. Cases to be Referred to a CASA Program

Custody dispute cases under the jurisdiction of the Clayton County Superior Court where the judge requests CASA involvement are proper for referral to the Clayton County CASA program.

Section II. Administrative Fee

Clayton County CASA will charge a flat \$500 administrative fee. All monies must be received by CASA prior to commencement of investigation by CASA. If the \$500 administrative is not paid the CASA investigation will not commence until the administrative fee is received.

Order for payment of costs of Guardian Ad Litem services will be sent to the respective parties by the Clayton County Superior Court and shall include the following statement: "Cash and money order are acceptable means of payment. No personal checks will be accepted; however, a check drawn on the respective attorney's firm will be accepted for payment. All fees shall be paid to Friends of Clayton County CASA, Inc., Care of Gerald Bostock, Program Coordinator of CASA; Clayton County Juvenile Court; 121 S. McDonough St. Courthouse Annex 3; Jonesboro, GA. 30236."

The Clayton County CASA Advisory Board is the recipient of the administrative fee and will use the fees to fund volunteer recruitment, training, and retention.

Section III. Role and Responsibility of a CASA Volunteer

The roles and responsibilities of the CASA/Guardian Ad Litem (GAL) are as follows:

- A. The CASA/GAL's Role: The CASA/GAL is a volunteer of at least 21 years of age from the local community who has been screened and completed the 40 hour state-certified CASA training program, as well as, has received 8 hours of investigative training related to Superior Court custody cases. A CASA/GAL is appointed by the judge as an officer of the Court to advocate for children who are involved in custody dispute proceedings. The role of the CASA/GAL is to provide the Superior Court with independent and objective information regarding the status of children involved in custody dispute matters. Upon appointment, the CASA/GAL independently gathers and evaluates information which the judge will take into consideration in making a decision to protect the best interests of the child.
- B. The CASA/GAL responsibilities under the Court include:
 - Independently gathers pertinent information to determine what is in the best interest of the child/children involved in the custody dispute; by reviewing all relevant records and interviewing interested parties to ascertain the facts and circumstances as related to the present case.
 - Develops and submits written and verbal reports to the Court and to the respective attorneys for review
 - Reports to and is supervised by Clayton County CASA Special Assistant for Judicial Investigations

C. A CASA/GAL MAY NOT:

- Become inappropriately involved in a case by engaging in activities which endangers the wellbeing of the child, the integrity of the program, or the objectivity of the volunteer
- Be involved in activities that are likely to result in a conflict of interest
- Give legal advice
- Provide therapeutic counseling
- Make placement arrangements for a child
- Be related to any parties involved in the case

Section IV. Implementation of Volunteer Activities

A. Appointment: Appointment of a CASA/GAL will begin with an Order of Appointment from Superior Court and will remain in effect until the CASA/GAL's service is terminated.

B. Assignment:

1. Once a determination is made that a Superior Court case requires a CASA/GAL, the following is requested:
 - a) A copy of the initiating complaint and any other pertinent information shall be forwarded to the Special Assistant in order to determine the CASA/GAL who will be assigned to the case for investigation
2. The Special Assistant or his/her designee assigns an available CASA/GAL as soon as possible
3. After assignment of the CASA/GAL is determined, the name will be forwarded to the Superior Court and an Order of Appointment will be processed
4. After the judge signs the CASA Appointment Court Order, the Order is returned to the Special Assistant or his/her designee at Clayton County Juvenile Court (121 S. McDonough St. Courthouse Annex 3, Jonesboro, GA. 30236)
5. The Special Assistant receives the Appointment Order and notifies the assigned CASA/GAL of appointment
6. The CASA/GAL receives the certified copy of the Appointment Order and should be prepared to review all pertinent records and/or documents once the administrative fee has been received from each party
7. The Special Assistant will forward a letter to the attorneys, of each party, requesting:
 - a) A list of witnesses that will be interviewed on their client's behalf (the list of witnesses shall be limited to ten names). This list shall include the names; addresses and telephone numbers of the witnesses
 - b) An appointment will be scheduled with the attorney and his/her client to be conducted at the Clayton County Juvenile Court and fees may be submitted for services at this time

8. Through the CASA/GAL Order of Appointment, The CASA/GAL becomes a party to the case
9. This assignment process may be revised and updated as necessary to meet the needs of the Superior Court and the Clayton County CASA program

C. Procedure of Information Gathering: Once the CASA/GAL has been assigned, the Special Assistant will review the case file and will discuss with the CASA/GAL his/her duties in the case. The CASA/GAL shall conduct an independent and objective investigation in order to gather pertinent factual information to present to the judge to determine the best interest for the child/children. The investigation shall include interviews with and observations of the child, interviews with other individuals that may help in determining what is in the child's best interest, and a review of the relevant records and reports of the case.

The duties the CASA/GAL will perform include:

Interviews:

1. The CASA/GAL or Special Assistant will obtain a copy of all petitions filed within the Superior Court by the respective parties and any interlocutory or other orders (TPO or other restraining orders) issued in the case. These documents will be maintained by the Clerk of the Superior Court. In the event of a modification of a divorce decree, a copy of the divorce order, agreement and any other documents pertinent to the case should be retrieved and made a part of the CASA/GAL's findings.
2. The CASA/GAL will begin the investigation by scheduling appointments via telephone or letter with the plaintiff and the defendant in the case. This interview is conducted primarily to obtain the plaintiff's and defendant's perspective (as a point of reference, these interviews are independent of one another). During this interview, the investigator will have each party sign Releases of Information in order to check criminal backgrounds, mental health records, school records and medical records for all parties including children.
3. The CASA/GAL shall obtain background information on the plaintiff and the defendant. This information should include the parties' dates of birth, social security numbers, marital status, number of marriages, dates of marriages and or divorces, number of children, employment information, monthly income and expenses, and criminal history.
4. The CASA/GAL shall interview all witnesses provided by the plaintiff and the defendant, as well as, attempt to locate additional witnesses (i.e., neighbors, employers, and any other persons that could offer information that would be helpful to the CASA/GAL in deciding what is in the best interest of the child/children). The first interview of a witness should be done in person.
5. The CASA/GAL shall not involve the child/children anymore than necessary. The CASA/GAL should not question a child/children unless they appear to be mature and/or old enough.

6. Home visits will be made to the plaintiff's and the defendant's residence. If circumstances allow, an evaluation of the home should include at least one unannounced visit.
7. The CASA/GAL will conduct a second interview with the plaintiff and the defendant at the unannounced home visit to clarify or verify inconsistencies and conflicting information that has been found during interviews with witnesses.

Reporting:

Written Reports: Written reports are required for all investigations. The CASA/GAL will prepare written reports under the supervision of the Special Assistant in a format and manner approved by the CASA program. Written reports are to be submitted to the Clayton County Superior Court Judge and to each attorney representing a party to the case in accordance with the Court rules prior to any hearing.

Written reports shall include information in the following areas:

- *Background Information:* information will detail the reason for the investigation (i.e. information pertaining to determining the most suitable custodial parent or a modification of the divorce decree).
- *Biographical Data:* information will include data on the plaintiff and the defendant (i.e., Date of Birth, Social Security Number, marriages, divorces, employment history, etc).
- *Financial Information:* information will include monthly income and monthly expenditures.
- *Findings:* information will reflect the witnesses' statements and other applicable information.
- *Comments and Recommendations:* the comments and recommendations section will reflect the investigator's depiction of the factual information, as well as, concerns received during the investigative process. In writing the findings and the recommendations, the CASA/GAL should be aware of the legal standards for determining the custody of the child/children. The legal standard is the "best interest" of the child/children.
- Attachments should be used whenever practical. For example, details of a lengthy police report should be paraphrased with reference to an attachment that contains the actual police report. All attachments should be tabbed at the end of the investigative report.
- All investigative reports shall be typed and submitted to the Special Assistant for review before being dispersed to the Superior Court and the respective attorneys.

Verbal Reports: The CASA/GAL shall also provide verbal reports on his/her findings when requested by the judge.

Mandatory Reporting: Clayton County CASA/GALs are mandated reporters. The CASA/GAL has a mandatory obligation to immediately report any suspicion of child abuse or neglect to the Department of Family and Children Services.

Testimony: The CASA/GAL may be called as a witness in an action by the Court or by a party to the case and address questions concerning the investigative report.

Access to Information: The Special Assistant shall assist the CASA/GAL in obtaining criminal record checks on all parties to the case. By order of the Superior Court, the CASA/GAL has the authority to obtain pertinent information related to the assigned case. To include but not limited to information and documentation from respective parties and attorneys.

- D. **Resignation:** When a CASA/GAL finds it necessary to resign from a case, he/she shall take the following actions:
- a) He/she should immediately notify the Special Assistant
 - b) The CASA/GAL shall provide a written resignation to facilitate the Court Appointment of a new CASA/GAL to the case
 - c) Upon a CASA/GAL's resignation all case files and court related materials shall be returned to the CASA Program offices

The Special Assistant will be responsible for removing the out-going CASA/GAL from the court order and seeking a replacement if needed. The Special Assistant will follow the appointment and assignment process (discussed above) in the event that a new CASA/GAL is needed for the case.

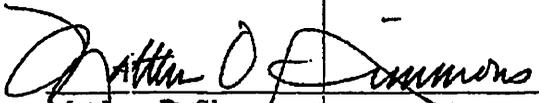
- E. **Termination Policy:** A CASA/GAL who does not adhere to the rules and procedure of the CASA program or who fails to perform his/her CASA/GAL assignments satisfactorily is subject to dismissal. A CASA/GAL may be terminated for taking action which:
- Could endanger the child or parties to a case
 - Is not within the scope of duties and responsibilities of a CASA/GAL
 - Violates approved guidelines or Clayton County Superior Court procedure and law
 - Breaches confidentiality
 - Could adversely affect the confidence of the public in the integrity of the program
 - Is considered gross misconduct or insubordination
 - Is performed, while acting as a CASA/GAL under the influence of alcohol or drugs
 - Includes theft of property or misuse of program equipment or materials

Section V. Working Relationships

- A. The Special Assistant will supervise the CASA/GAL and facilitate the interaction of the CASA/GAL with the Superior Court and other named parties involved in the case.
- B. The CASA/GAL will maintain and keep up to date notes for each assigned case and will seek guidance and assistance from the Special Assistant in the performance of CASA duties.
- C. The Clayton County Superior Court and the Special Assistant shall communicate on an as-needed basis to facilitate an effective operation of the Clayton County CASA custody dispute GAL service. There can be no ex parte communication.
- D. A Clayton County CASA staff member shall accompany the CASA volunteer in Court proceedings and settlement conferences.
- E. Clayton County CASA and the Clayton County Superior Court will maintain communication regarding the management, implementation, and operation of the CASA/GAL custody dispute service, as well as, provide information on CASA volunteer performance.
- F. The CASA/GAL caseload may vary depending on volunteer availability. Clayton County Superior Court and Clayton County CASA should correspond with one another regarding the number of available volunteers and the number of cases the CASA/GAL service is able to accept.

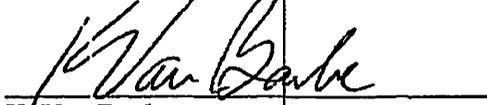
Section VI. Acceptance

This Memorandum of Understanding has been reviewed and accepted by the management of governing bodies of the organizations indicated below.



Matthew O. Simmons
Chief Judge
Superior Court
Clayton Judicial Circuit

Date: 11-20-07



K. Van Banke
Chief Judge
Juvenile Court
Clayton Judicial Circuit

Date: 12/17/07



Gerald Bostock
CASA Program Coordinator
Juvenile Court of Clayton County

Date: 12/13/07