

EXHIBIT 5
to
Defendant's Statement of Material Facts
(Declaration of Stacey Merritt)

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

GERALD LYNN BOSTOCK,)	
)	
Plaintiff,)	
)	
v.)	CIVIL ACTION
)	NO: 1:16-cv-01460-ELR-WEJ
CLAYTON COUNTY,)	
)	
Defendant.)	

DECLARATION OF STACEY MERRITT

1.

My name is Stacey Merritt. I have personal knowledge of the facts set forth in this Declaration and know them to be true and correct. I am over the age of eighteen years old, am suffering no disabilities, and am competent to execute this Declaration.

2.

I am currently the Director of Internal Audit for Clayton County (“the County”) and held this position in 2013.

3.

In May 2013, I oversaw an audit of the Guardian Ad Litem (“GAL”) bank account owned by Friends of Clayton County CASA, Inc. (“FCCC”) and maintained by Gerald Bostock. The audit was conducted by Leslie Moore, who was an associate internal auditor at time under my supervision.

4.

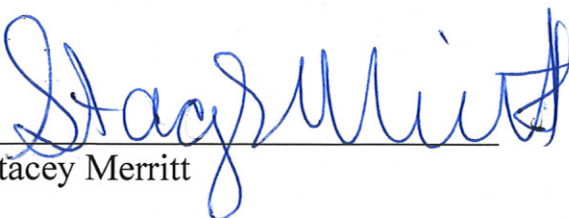
Although audits written by the County’s Internal Audit Department do not as a matter of practice identify specific individuals and focus on identifying problems and recommending to managers changes to procedures and processes, in this instance, I agreed with Ms. Moore’s conclusion that Mr. Bostock had spent funds from the GAL account on expenses that were not authorized by the Memorandum of Understanding (“MOU”), and that he had otherwise mishandled the GAL account. The changes recommended in the audit were intended to prevent such wrongdoing from occurring again in the future.

5.

If I had been given the responsibility of deciding what personnel action to take based on what I learned during the audit, I would have terminated Mr. Bostock’s employment. Based on my review of the evidence gathered during the audit, Mr.

Bostock treated the GAL account like a fundraising and marketing account, which was not authorized under the terms of the MOU.

Pursuant to 28 U.S.C. § 1746, by my signature below, I declare, under penalty of perjury, that the foregoing is true and corrected. Executed on March 17, 2022.



Stacey Merritt

EXHIBIT 6
to
Defendant's Statement of Material Facts
(Declaration of Concilia Chilumuna)

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

GERALD LYNN BOSTOCK,)	
)	
Plaintiff,)	
)	
v.)	CIVIL ACTION
)	NO: 1:16-cv-01460-ELR-WEJ
CLAYTON COUNTY,)	
)	
Defendant.)	

DECLARATION OF CONCILIA E. CHILUMUNA

1.

My name is Concilia E. Chilumuna. I have personal knowledge of the facts set forth in this Declaration and know them to be true and correct. I am over the age of eighteen years old, am suffering no disabilities, and am competent to execute this Declaration.

2.

I have been the Chief of Child Welfare for the Juvenile Court of Clayton County (“the County”) since September 2018. In 2013, I was the Citizens Review Panel Coordinator for the Juvenile Court.

3.

The Juvenile Court maintains records for individuals who have applied to become a Clayton County CASA volunteer, who have completed the required training to become a Clayton County CASA volunteer and who have been certified and sworn in as a Clayton County CASA volunteer.

4.

I have not been able to locate any records with the Juvenile Court indicating that Danielle Beaty, Regan Bush, Rasheen Hunter, Kim Norwood or Gwendolyn Hockley applied to become a Clayton County CASA volunteer, completed the required training to become a Clayton County CASA volunteer, or were certified or sworn in as a Clayton County CASA volunteer.

5.

Rhonda Burke lived in a small portion of the City of Atlanta that is located within Clayton County. Ms. Burke completed the required training to become a Clayton County CASA volunteer in July 2013, and was certified as a Clayton County CASA volunteer and sworn in as a Clayton County CASA volunteer in August 2013.

Pursuant to 28 U.S.C. § 1746, by my signature below, I declare, under penalty of perjury, that the foregoing is true and corrected. Executed on March 21, 2022.



Concilia E. Chilumuna

EXHIBIT A

Last Name	First Name	Address	City	State	Zip Code	Email
Agnew	Tijuana	2826 Haddon Drive	Rex	GA	30273	tagnew@student.clayton.edu
Alexander	Guy	315 North Grove Court	McDonough	GA	30252	galexander@gacrown.com
Amanuel	Herani	6392 Maddox Road	Morrow	GA	30260	heranimanuel@gmail.com
Banks	Rameachia	7219 New Dale Road	Rex	GA	30273	msbanks1984@yahoo.com
Barnes	Anastasia	100 Riverview Place #1102	Jonesboro	GA	30238	mostambitious1123@gmail.com
Bazemore	Nichole	1112 Lake View Way	Jonesboro	GA	30238	ncbmore@hotmail.com
Beaty	Danielle	1500 Walton Reserve Boulevard Apt. 7	Austell	GA	30168	d.beaty.claytoncountycasa@gmail.com
Bennett	Lovette	1442 Starling Court	Hampton	GA	30228	lbennett68@aatt.net
Brown	Marjorie	1755 Signature Court	Hampton	GA	30228	mmb2008@bellsouth.net
Brown	Brenda	2930 Wood Hollow Lane	Jonesboro	GA	30236	bendaloybrown@comcast.net
Brown	Nova	170 Edmondson Way	Fayetteville	GA	30214	geminio605@live.com
Bullard	Obreziah	311 Carrington Green Parkway	McDonough	GA	30252	olbullard@gmail.com
Burke	Rhonda	5445 Waterfall Court	Atlanta	GA	30349	rhondab_law@yahoo.com
Busby	Brittany	314 Ridge Trail	Riverdale	GA	30274	brittany.busby06@gmail.com
Bush	Reagan	5072 Laurel Bridge Drive SE	Smyrna	GA	30082	reaganmbush@gmail.com
Buiter	Reginald	8671 Twin Oaks Drive	Jonesboro	GA	30236	retiredreg@yahoo.com
Daniels	Sheila	1158 St. Phillips Court	Locust Grove	GA	30248	sdls4it@gmail.com
Darnell	Monique	6033 Woodview Drive	Morrow	GA	30260	ladymd_21@yahoo.com
Dickinson-Ford	Ruby	10845 Southshore Court	Hampton	GA	30228	rubie.dee79@gmail.com
DiPetta	Roberta	207 Banks Station	Fayetteville	GA	30214	provfundsol@yahoo.com
Doanes	Shatyn	120 Kettering Trace	Tyrone	GA	30290	sharyndoanes@yahoo.com
Durham	Wendy	5089 Hickory Circle	Ellenwood	GA	30294	wrd1967@gmail.com
Edwards	Damico	110 Stratmore Place	Stockbridge	GA	30281	edwardsdamico43@gmail.com
English	Jackquelina	313 Nunnay Drive	Stockbridge	GA	30281	jenGLISH.casaadvocate@yahoo.com
Gaba	Laud	7676 Marabou Lane	Riverdale	GA	30274	claudg4@gmail.com
Gilbert	Bennecia	681 Flint River Road Apt. 17D	Jonesboro	GA	30238	bgilbert2@student.gsu.edu
Glaze	Jane	2171 Indian Hill Road	Jonesboro	GA	30236	
Gray	Yukema	2128 Trees of Avalon Parkway	McDonough	GA	30253	yukemasky@yahoo.com
Hall	Rose	3388 Rock Creek Drive	Rex	GA	30273	rhall234@gmail.com
Hamilton	Steve	712 Brambling Way	Stockbridge	GA	30281	hamilton_sn@mercer.edu
Harris	Jalea	9509 Carnes Crossing Circle	Jonesboro	GA	30236	jalea.harris@yahoo.com
Hastings	Wilma	8263 Penbrook Terrace	Jonesboro	GA	30236	wihastings@bellsouth.net
Hawkins	Peggy	1102 Hyacinth Lane	Peachtree City	GA	30269	peggy.hawkins@wellstar.org
Hendricks	Camille	4740 Ruby Lane	Forest Park	GA	30297	cameo_1962@yahoo.com
Hightower	Anthonio	526 Country Greens Drive	Jonesboro	GA	30238	hightower1133@yahoo.com
Hill	Jared	7247 Amanda Court	Riverdale	GA	30274	jalanh2002@yahoo.com

Hockley	Gwendolyn	5749 Pine Oak Drive	Norcross	GA	30092	ghockley@hotmail.com
Holmes	Ecclesia	9307 Deer Crossing Drive	Jonesboro	GA	30236	eholmes5@student.gsu.edu
Hope	Lenise	149 Eihan Moor	Jonesboro	GA	30238	hopegregory@bellsouth.net
Hunter	Rasheen	4934 Lakespur Lane	Atlanta	GA	30349	rasheen.hunter@gmail.com
Jackson	LaDonna	219 Sandstone Drive	Hampton	GA	30228	
Jones	Cory	2855 High Tide Drive	Atlanta	GA	30349	cjones331@gmail.com
Joseph	Marlene	6315 Lamp Post Place	College Park	GA	30349	marleneajoseph@yahoo.com
JuBeark	Cynthia	10666 Wimbeldon Court	Hampton	GA	30228	gjbeark@yahoo.com
Kent	Valerie	1152 Timberlake Court	Riverdale	GA	30296	vhkent@aol.com
Langlais	Helena	705 Riverview Place	Jonesboro	GA	30238	lang88@bellsouth.net
Layton	Jennifer	4704 Southlake Cove Court	Jonesboro	GA	30236	jenn@jennifur.net
Leaks	Claressia	160 Brandon Mill Circle	Fayetteville	GA	30214	reesieleaks@gmail.com
Luke	Brittne	2101 Eastwood Village Drive Apt. 210	Stockbridge	GA	30281	bluke@student.clayton.edu
Luongo	Brandi	100 Evenview Drive	Jonesboro	GA	30236	brandil1425@aol.com
Magbie	Thomasina	P.O. Box 155	Forest Park	GA	30298	tmagbie@gmail.com
Marshall-Dyer	Tamika	11600 Alicia's Court	Hampton	GA	30228	tamika4660m@gmail.com
McFadden	Janice	825 Kohl Drive	McDonough	GA	30253	jenicemc2007@yahoo.com
Mortimer	Frances	71 Oak Grove Road	McDonough	GA	30253	fmortimer@hammersmith.net
Niare	Angelique	4020 Grant Road	Ellenwood	GA	30294	a.niare_37@yahoo.com
Norwood	Kim	5256 Joan of Arc Place	Atlanta	GA	30349	levarikim@att.net
Ogwofu	Oretha	10452 Ivygate Avenue	Jonesboro	GA	30238	ogwofu.oretha@gmail.com
Pitts	Helen	300 Labrea Boulevard	McDonough	GA	30253	hepitts@dekalbcountyga.gov
Quinn	Freddie	1867 Slate Road	Ellenwood	GA	30294	freddiequinn2@yahoo.com
Randolph	Cleve	755 Swamp Creek Drive	Jonesboro	GA	30238	cleve.and.sue@gmail.com
Roberson	Ainka	434 Canady Court	Hampton	GA	30228	ainkanr@gmail.com
Roberts	Eleanor	261 Dorsey Road	Hampton	GA	30228	smokey5000@bellsouth.net
Sivels	Jacqueline	1528 Wynthrope Court	Riverdale	GA	30274	sivels.jacqueline@yahoo.com
Smith	Shanikka	1604 Chase Lake Drive	Jonesboro	GA	30236	s.l.smithba@gmail.com
Smith	Meredith	10553 Sandpiper Road	Jonesboro	GA	30238	memi703@yahoo.com
Stallworth	Marian	6708 Judy Lane	Riverdale	GA	30296	mastallworth@yahoo.com
Stansbury	Ramala	1112 Hockstra Point	Stockbridge	GA	30281	ramalastansbury@hotmail.com
Street	Joyce	6497 King William Drive	Morrow	GA	30260	gmastreet@yahoo.com
Summers	Tanya	815 Sandlwood Court	Morrow	GA	30260	cham120@yahoo.com
Swaby	Mabel	7594 Colonial Court	Jonesboro	GA	30236	mjblove@aol.com
Thomas	Twila	3704 Southlake Cove Court	Jonesboro	GA	30236	twila.thomas@yahoo.com
Tyrus	Adrienne	16 Roundtree Road	Riverdale	GA	30274	tyrusadrienne@yahoo.com
Van Eiten	Sara	100 Dover Court	Fayetteville	GA	30215	sawalve@hotmail.com

Vereen	Beverley	5991 Sunflower Court	Ellenwood	GA	30294	retiree55@bellsouth.net
Walker	Deborah	6564 Esquire Place	Riverdale	GA	30296	walk5923@bellsouth.net
Weeks	Etess	4473 Hillpine Road	Forest Park	GA	30297	ddweeksr@hotmail.com
Williams	Angela	P.O. Box 346	Morrow	GA	30260	angelawilliams75@yahoo.com
Williams	Erica	285 Ridgemont Drive	Fayetteville	GA	30215	e4ewms4@gmail.com
Williams	Tenisha	194 Brandon Ridge Court	Riverdale	GA	30274	tnwilliams@gmail.com
Wilson	Barbara	1078 Maria Drive	McDonough	GA	30253	bjfdw@yahoo.com
Wright	Christina	6929 Biscayne Boulevard	Rex	GA	30273	christinawilliams1976@yahoo.com
Wright	Donna	1110 Genny Lane	Riverdale	GA	30296	thanku442006@yahoo.com