

In The Matter Of:

Bostock v.

Clayton County

Colin Slay

September 10, 2021

Video Deposition

Regency-Brentano, Inc.

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

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

Videotaped deposition of COLIN SLAY,
 taken on behalf of the Defendant, pursuant to
 Notice and agreement of counsel, in accordance
 with the Federal Rules of Civil Procedure,
 before Cynthia B. Gatewood, Certified Court
 Reporter, at 100 Galleria Parkway, Suite 1600,
 Atlanta, Georgia, on the 10th day of September
 2021, commencing at the hour of 10:07 a.m.

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20 Also Present:

21 Mr. Gerald Bostock

22 - - -

23 (Disclosure, as required by the Georgia
24 Board of Court Reporting, was made by the court
25 reporter, a written copy of which is attached
hereto.)

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1 (VIDEO CAMERA ON.)

2 THE VIDEOGRAPHER: Today is September 10th,
3 2021. The time is now 10:07 a.m. We're on the
4 record. Will the court reporter please swear in
5 the witness.

6 COLIN SLAY,
7 having been first duly sworn, was examined and
8 testified as follows:

9 CROSS-EXAMINATION

10 BY MR. BUCKLEY:

11 Q. Good morning, Mr. Slay. My name is Ed
12 Buckley.

13 A. Good morning.

14 Q. And I represent Gerald Bostock, and I am
15 going to take your deposition here today. Have you
16 ever had your deposition taken before?

17 A. I have not.

18 Q. Okay. Congratulations. So you are under
19 penalty of perjury. You understand those penalties are
20 criminal penalties; right?

21 A. Yes, sir.

22 Q. Okay. So you are obliged to tell the truth
23 here --

24 A. Yes, sir.

25 Q. -- in response to my questions. I will be

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1 asking you a number of questions today. If I ask you a
2 question that for any reason you don't understand, you
3 just tell me, and I'll try to rephrase it so that it
4 makes sense. Okay?

5 A. Yes, sir.

6 Q. And just as you're doing right now, if
7 you'll make sure your answers are verbal answers, yes,
8 no, or if you need to explain, that's fine. But uh-huh
9 and huh-uh or a nod or a shake of the head --

10 A. Yes, sir.

11 Q. -- they don't cut it in a deposition. Okay?

12 A. Right.

13 Q. Our court reporter needs to take down a
14 transcript of your testimony, so we're agreeable on
15 that. And I will assume, unless you say, "I don't
16 understand your question," that you do understand it
17 and that your answer is responsive to the question.

18 A. Yes, sir.

19 Q. All right? Okay. So are you laboring under
20 any disability or taking any medication that would
21 render your memory less than accurate?

22 A. No, sir.

23 Q. Okay. Have you discussed your testimony in
24 this case with anybody other than the two lawyers who
25 are present in this deposition?

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1 A. No, sir.

2 Q. Okay. And I mean anybody. I mean your
3 spouse, your best friend, anybody who works in Clayton
4 County government, anyone like that.

5 A. Not my testimony per se. I mean, I've had
6 conversations with the attorneys, and Judge Teske has
7 been a part of those conversations.

8 Q. Okay.

9 A. But --

10 Q. Let's carve that out a little bit because
11 I'm not going to ask you about any communications you
12 had with --

13 A. Right.

14 Q. -- the lawyers. Those are privileged. Did
15 you have any separate discussions with Judge Teske
16 either concerning your testimony or, more generally,
17 the facts surrounding the case that we're here about
18 today at any time from the time that you all started
19 investigating Mr. Bostock going forward?

20 A. Well, obviously, I had conversations with
21 Judge Teske and John Johnson as a part of the
22 investigation and the work that went into that. And,
23 you know, even following Mr. Bostock's termination,
24 there were ongoing conversations about the aftermath
25 and dealing with that.

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1 Q. Okay. We're going to get into some of
2 those -- well, all of those conversations --

3 A. Yes, sir.

4 Q. -- today. Okay? So hold that thought.
5 Have you had -- other than Teske and Johnson, have you
6 had conversations with anybody else, separate from the
7 lawyers in Clayton County government, concerning
8 Mr. Bostock's -- the events leading up to his
9 termination or the events after his termination?

10 A. The only conversation I had -- I mean,
11 obviously my wife knew I was coming here to give the
12 deposition today, but not about testimony or not really
13 about the case in any way.

14 Q. Okay. All right. So I just want to be
15 clear that the only two people that you've talked to,
16 other than your spouse, the only two people in Clayton
17 County government that you've talked to about this
18 matter are Teske and Johnson?

19 A. Yes, sir.

20 Q. All right. Now, one of the things I forgot
21 to tell you, in the course of your deposition if you
22 remember something that it would add to any of your
23 answers to your questions, then, you know, please tell
24 me.

25 A. Okay.

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1 Q. Okay. You know, and I'll just give you a
2 for instance. You've discussed some of the reasons for
3 Mr. Bostock's termination with Sabrina Crawford; right?

4 A. Yeah, during the -- yeah, back then when
5 that happened, yes.

6 Q. All right. So if you had remembered that --

7 A. Right.

8 Q. -- rather than me reminding you during your
9 testimony, you would be able to raise your hand and
10 say, "Hey, Mr. Buckley, I just remembered that we also
11 talked to Sabrina Crawford about this." So but now my
12 having reminded you of it, was that in a meeting at her
13 car dealership with Mr. Teske at or close to the time
14 that Mr. Bostock was terminated?

15 A. It was.

16 Q. Have you had any other conversations, other
17 than that meeting with Sabrina Crawford, concerning
18 Mr. Bostock's termination?

19 A. Not that I recall.

20 Q. Okay. All right. Again, if you recall
21 it --

22 A. Right.

23 Q. -- maybe it was a quick phone call, maybe
24 you saw her at a meeting and you had a couple of words,
25 I'd like you to tell me. So just try -- today we want

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1 to get your very best memory of all the events
2 surrounding this incident. Okay?

3 A. I have spoken to Ms. Crawford a few times
4 since all of that transpired, but it was not about
5 Mr. Bostock.

6 Q. Okay. What sort of things have you spoken
7 with Ms. Crawford about since that time?

8 A. She started a nonprofit. It's called Gigi's
9 House. It's for young women who have been sex
10 trafficked. It's sort of a group home for those young
11 women when they've been taken out of the situation.
12 And she was having some issues with -- it's located in
13 Lovejoy, Georgia, which is in the county, Clayton
14 County. And she was having some issues with the
15 Lovejoy Police Department, so she reached out. This
16 probably would have been maybe three or four years ago
17 at this point.

18 She reached out to John -- not John -- Judge
19 Teske, and he and I had two or three meetings with her.
20 And, of course, I've had some follow-up phone calls
21 basically trying to get our assistance with the Lovejoy
22 Police Department. And, in fact, we ended up having a
23 subsequent meeting with the chief of the Lovejoy Police
24 Department, Ms. Crawford, Judge Teske, and I. And we
25 helped devise a protocol for dealing with the young

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1 women when they were causing disruptions in the home or
2 had run away from the home.

3 Q. I see. So the issue that you all were
4 focusing on was these young women who had been sex
5 trafficked and who were living in the home. There were
6 incidents where they would disrupt the home, and then
7 there was a question of whether or how police should be
8 involved in handling those situations?

9 A. Correct, or whether or not the young women
10 should be detained.

11 Q. Right.

12 A. There were a couple of instances where the
13 girls actually left the home, kind of --

14 Q. Right.

15 A. -- technically be a runaway, left their
16 abode. In our court, we don't -- it's anti-ethical to
17 our mission to detain a young woman who is a victim, so
18 we were trying to figure out a way that we could get
19 ahold of the situation without having to resort to
20 certainly any kind of long-term detention.

21 Q. Okay. So did any of these young women go
22 through the or use the services of the Clayton County
23 CASA program?

24 A. I can't say for certain. Most of the young
25 women that were housed came from the city of Atlanta or

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1 other counties.

2 Q. Okay.

3 A. I'm sure there were probably a few that came
4 through that were Clayton -- you know, from Clayton
5 County. And if they had a dependency case pending
6 before the court, then they would have had a CASA
7 assigned to them. That's our practice.

8 Q. Okay. So backing up to what we were talking
9 about before this, and I was asking you anybody that
10 you've spoken to about the circumstances surrounding
11 Gerald's termination, were you present when Judge Teske
12 announced to courthouse staff that Mr. Bostock had been
13 terminated?

14 A. I don't recall. I know there was a meeting
15 in the -- what we call the resource center. It's a
16 large sort of training room that we use. And I
17 honestly do not recall that meeting at all. I don't
18 know if I was there or if I was on leave when that
19 meeting occurred.

20 Q. Okay.

21 A. And back to your previous question about
22 other people that I would have spoken to, I also spoke
23 to the auditors that did the audit of the accounts.
24 And we also met with Renee Bright, who was the human
25 resources director. So I just wanted to add that --

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1 Q. Okay.

2 A. -- for clarification.

3 Q. Who were the -- can you name the auditors?

4 A. It was Stacey Merritt -- well, I think the
5 actual auditor was Leslie Moore, and then Stacey
6 Merritt was her supervisor. She was or is the director
7 of the Internal Audit unit for the county.

8 Q. Okay. After the -- whether or not you were
9 present at the meeting where Mr. Bostock's termination
10 was announced to courthouse staff, you heard about it
11 afterwards; right?

12 A. Yeah, I was aware of it.

13 Q. Okay. Did anybody talk to you about it or
14 talk to you about the reasons Gerald was terminated or
15 that they couldn't imagine that Gerald -- why Gerald
16 would be terminated or any of those things? Did people
17 express opinions about it to you?

18 A. The only conversations I had with anyone in
19 the court about Mr. Bostock would have been Carol
20 Gossett, who was appointed to take his position after
21 he was terminated.

22 Q. Okay.

23 A. I had several conversations. I really don't
24 recall anything in detail about Mr. Bostock. It was
25 more about the job --

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1 Q. Right.

2 A. -- that she was assuming.

3 Q. So I just want to be clear. When you talked
4 to Ms. Gossett -- she's the person that replaced
5 Gerald; right?

6 A. Correct.

7 Q. When you talked to her, it's your testimony
8 that you didn't talk to her specifically about the
9 reasons Gerald was terminated but only about the job
10 duties that she would be assuming?

11 A. I'm not going to say I didn't have a
12 conversation with her about the reasons Mr. Bostock was
13 terminated. I don't -- it doesn't stand out to me. I
14 don't recall that per se.

15 Q. Okay.

16 A. But in the interest of transparency, I don't
17 want to purvey that I didn't have any -- I don't recall
18 that.

19 Q. Okay. Here's where -- what we're doing
20 today. We want your best memory.

21 A. Right.

22 Q. Okay.

23 A. Yeah.

24 Q. Yeah. If you don't remember, then just say
25 so.

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1 A. Okay.

2 Q. And, also, if you don't know.

3 A. Sure.

4 Q. That answer, if it's a truthful answer --

5 A. Right.

6 Q. -- is fine.

7 A. Okay.

8 Q. So all right. So I'm just going to -- and
9 you said you talked to Carol Gossett, but you're not
10 clear that you necessarily talked to her about the
11 circumstances of Gerald's termination. Did you talk to
12 Leslie Moore or Stacey Merritt about the circumstances
13 of his termination?

14 A. Not about the circumstances of his
15 termination. My conversation with them was about the
16 results of the audit.

17 Q. Okay. Now, one of the results of that audit
18 was that they, Ms. Moore and Ms. Merritt, found the
19 memorandum of understanding between the Superior Court
20 of Clayton County and Clayton County CASA to be very,
21 very vague in terms of the handling of funds that went
22 to Clayton County CASA. Is that a fair way of putting
23 it?

24 A. I wouldn't --

25 MR. HILL: Object to form.

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1 BY MR. BUCKLEY:

2 Q. Go ahead.

3 A. I wouldn't characterize it that way. I
4 think what they stated in the audit was that there
5 weren't proper controls in place --

6 Q. Okay.

7 A. -- for the management of those funds for
8 determining, you know, who had authority. There
9 weren't proper accounting practices in place --

10 Q. Okay.

11 A. -- to account for the expenditures, the
12 income, those sorts of things.

13 Q. And that, that -- I'm going to call it the
14 MOU.

15 A. Uh-huh (affirmative).

16 Q. It was a memorandum of understanding.

17 A. Yes.

18 Q. You're familiar with the document.

19 A. Yes, sir.

20 Q. Right? You probably reviewed the document
21 in preparation for your deposition, did you?

22 A. I did.

23 Q. Okay. And so -- and we'll look at it later
24 on. But that MOU, the only thing it really says about
25 the handling of money is that, "All fees shall be paid

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1 to Friends of Clayton County CASA, Inc., Care of Gerald
2 Bostock, Program Coordinator of CASA, Clayton County
3 Juvenile Court, 121 South McDonough Street, Courthouse
4 Annex, Jonesboro, Georgia 30236." That's all it says;
5 right?

6 A. About --

7 MR. HILL: Object to the form of the
8 question.

9 BY MR. BUCKLEY:

10 Q. Yeah, go ahead.

11 A. About the receipt of the monies? Is that
12 what you're asking?

13 Q. Well, about -- yeah, about anything about --
14 well, strike that -- about the receipt of money.
15 That's all it says about the receipt of the money, that
16 it shall be directed to Mr. Bostock; right?

17 A. I think that is right, yes, sir.

18 Q. Okay. And then it also says, in terms of
19 the use of the money, "The Clayton County CASA Advisory
20 Board is the recipient of the administrative fee and
21 will use the fees to fund volunteer recruitment,
22 training, and retention."

23 A. Correct.

24 Q. And that's all it says; right? It doesn't
25 give any specifics about the parameters of recruitment,

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1 training, or retention, or what's an appropriate
2 expenditure versus an inappropriate expenditure. It
3 doesn't get that specific, does it?

4 A. No, sir.

5 Q. Okay. Now, has that document, since
6 Mr. Bostock was fired, has that document ever been
7 revised, rewritten?

8 A. It has been amended, I believe, four
9 times --

10 Q. Yeah.

11 A. -- since then.

12 Q. Okay.

13 A. It was amended immediately after
14 Mr. Bostock's termination, and then there have been
15 some administrative changes to the document --

16 Q. Okay.

17 A. -- I believe two other times.

18 Q. And it's much more specific now than it was
19 then concerning the scope of expenditure of those
20 funds.

21 A. It is.

22 Q. Is that fair?

23 A. It is, yes.

24 Q. Okay. And it's more specific now than it
25 was then about how -- the scope of duties of the

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1 program coordinator with respect to those funds;

2 correct?

3 A. Yes. We changed how the money is received.

4 Q. It's actually received by the court now,
5 isn't it?

6 A. It is. It's received by our clerk's office.

7 Q. Okay.

8 A. Like all the other fines, fees, you know,
9 other payments the court receives, restitution payments
10 and such, it's received by the clerk's office.

11 Q. Okay.

12 A. They record it, it's deposited into the
13 court's account, and then the disbursement of that
14 money is -- there's a process for approving
15 expenditures and the disbursement of the money now.

16 Q. Okay. And so that was one of the things
17 that the auditors were critical of was the lack of
18 guidance provided by the MOU; right?

19 A. A lack of control. I don't recall
20 necessarily guidance being --

21 Q. Okay.

22 A. -- a particular word they used, but
23 certainly the lack of control.

24 Q. Okay.

25 A. Lack of separation of duties in terms of who

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1 receives and who has --

2 Q. Okay.

3 A. -- authority to expend, those sorts of
4 things.

5 Q. Right. And on what they can be spent;
6 right?

7 A. Yes, sir, I believe so, yeah.

8 Q. Did you ever go to a Clayton County CASA
9 event where alcohol was served?

10 A. Yeah, I've been to probably one or two.

11 Q. Okay. Did you ever go to any that were
12 outside of Clayton County?

13 A. I don't know that I've ever been to a CASA
14 event outside the county.

15 Q. Do you know if Judge Teske ever went to a
16 CASA event outside of Clayton County?

17 A. I'm not sure.

18 Q. Do you know if he -- you have been to events
19 at least where alcohol was served; right?

20 A. I remember one particular event was at
21 Chili's. I believe it was in the run up to the annual
22 Duck Derby.

23 Q. Right. Okay.

24 A. And I believe it was sort of a volunteer
25 appreciation dinner, and that's the one that I can

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1 remember for sure.

2 Q. Was the Chili's in Clayton County?

3 A. It was, on Mount Zion Parkway, I believe.

4 Q. And alcohol was served at that event?

5 A. There were -- I wouldn't say it was served.

6 People were ordering, you know, beer and wine and that
7 kind of thing.

8 Q. Okay. And you didn't consider that an
9 improper use of CASA funds, at least at that point in
10 time, did you?

11 A. I would have absolutely considered it an
12 improper use of CASA funds to pay for alcohol.

13 Q. Are you a teetotaler yourself?

14 A. No, sir.

15 Q. Okay. And but there is nothing in the MOU
16 that says that funds will not be spent on alcohol for
17 recruiting events, for instance. There's nothing that
18 says that.

19 A. There's nothing in the MOU that says that.
20 But the county, for instance, the county reimbursement
21 rules, the county will not reimburse employees for
22 alcohol. If we go somewhere on a conference or
23 something and we have a meal and we have a drink, we
24 have to ask for those drinks to be put on a separate
25 tab that we're responsible for.

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1 Q. Okay. But these funds were not per se
2 county funds.

3 A. No, they were county funds.

4 Q. These were funds that were held by CASA;
5 right?

6 A. They were held by the Friends of Clayton
7 County CASA, but those --

8 Q. Friends of Clayton County CASA.

9 A. Those funds came in through an agreement, a
10 government agreement.

11 Q. Right.

12 A. And so I consider those county funds.

13 Q. Okay. But you're not giving us a legal
14 opinion here today.

15 A. Absolutely not.

16 Q. Right.

17 A. I'm not an attorney.

18 Q. Okay. Clayton County CASA is a private
19 nonprofit, is it not?

20 A. It is.

21 Q. Okay. So --

22 A. With the express mission to support the
23 Clayton County CASA program, which is a government
24 program.

25 Q. Right. Okay.

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1 MR. HILL: Just wait. To clarify, are you
2 saying Clayton County CASA or the Friends of
3 Clayton County --

4 MR. BUCKLEY: Friends of Clayton County
5 CASA.

6 A. Is a nonprofit, yes.

7 BY MR. BUCKLEY:

8 Q. Okay. Now, my understanding is that there
9 would be a payment in order to have a CASA volunteer
10 serve as a guardian ad litem that would be paid -- a
11 \$500 payment. This is back when -- the MOU that we're
12 talking about when Gerald was, you know, the
13 coordinator.

14 A. Right.

15 Q. That \$500 payment was made to -- was made to
16 Friends of Clayton County CASA?

17 A. I believe it was in the care of at that time
18 Mr. Bostock, who --

19 Q. Okay.

20 A. -- received the money and made the deposit.

21 Q. So -- and I'm reading again the MOU. It
22 says, "All fees shall be paid" -- let me back up
23 because I want to give context here, and I think you
24 deserve context. It says, "Order for payment of costs
25 of guardian ad litem services will be sent to the

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1 respective parties by the Clayton County Superior Court
2 and shall include the following payment: Cash and
3 money order are acceptable means of payment. No
4 personal checks will be accepted. However, a check
5 drawn on the respective attorney's firm will be
6 accepted for payment. All fees shall be paid to
7 Friends of Clayton County CASA, Inc., care of Gerald
8 Bostock, Program Coordinator," et cetera.

9 So if -- I just want you to walk me through
10 how that occurred. Somebody requires the services of a
11 guardian ad litem. They're in court. There's a child
12 who needs a guardian ad litem. Who writes that check?

13 A. The parents would be responsible, each
14 party, so the mother -- because these were typically
15 divorce cases where there was a custody issue.

16 Q. Okay.

17 A. So each party would be required to pay half
18 of that fee, so \$250 each.

19 Q. Okay. And they would write -- they're
20 required by the court to pay the fee.

21 A. Uh-huh (affirmative).

22 Q. Right?

23 A. Correct.

24 Q. But the check that they wrote was to Friends
25 of Clayton County CASA.

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25

1 A. Yeah.

2 Q. Correct?

3 A. The checks -- the only checks we accepted
4 were from their representing attorneys' firms.

5 Q. Okay.

6 A. So, yes, those checks would be written or a
7 money order would be delivered by the parent or even
8 cash at times.

9 Q. What would happen if the check were made out
10 to -- let's say they made a mistake and made it out to
11 the clerk of court. Would you all just not accept the
12 check?

13 A. I don't know that that ever happened, but I
14 would assume whoever was receiving those monies would
15 ask them to re-write the check to the Friends.

16 Q. Right. Okay. So -- and, again, if I
17 understand correctly, Friends of Clayton County CASA is
18 a -- is it a 501(c)(3)?

19 A. I believe so, yes.

20 Q. Okay. Do people who write these checks get
21 a tax deduction for writing these checks?

22 A. I would assume they could. I don't know if
23 they did.

24 Q. All right. Okay. Would anybody other
25 than -- well, let's see. Was anybody who worked for

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1 the court on the Friends of Clayton County CASA board
2 at the time Gerald Bostock served as coordinator?

3 A. An employee serving on the board?

4 Q. Yeah.

5 A. I don't recall that ever being the case.

6 Q. Okay. And Judge Teske wasn't on the board.

7 A. No, sir.

8 Q. Okay. The board consisted of private
9 citizens who oversaw the program; right?

10 A. Correct.

11 Q. And did Mr. Bostock report to that board?

12 A. He had a reporting responsibility about the
13 activities, specifically around fundraising efforts,
14 the Duck Derby, those sorts of things. But he didn't
15 report to the board in his employment with the county.
16 He reported directly to me.

17 Q. So going back to your statement about you
18 would consider the expenditure on alcohol --

19 A. Right.

20 Q. -- to be improper. And you used as an
21 analogy county employees at county sanctioned events,
22 they'd have to buy their own alcohol. They couldn't
23 charge the county for it; right?

24 A. That's correct.

25 Q. Okay. But Clayton County CASA is not a

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1 county organization. It is a separate private
2 nonprofit; right?

3 A. That's right.

4 MR. HILL: Object to form.

5 BY MR. BUCKLEY:

6 Q. And so it would be the board who would
7 determine what is or is not the proper expenditure of
8 funds normally; correct?

9 A. I would say that is correct for funds that
10 they raised outside of the GAL program.

11 Q. Okay. And are you basing what you're
12 saying -- you've given me a nuanced answer. Are you
13 basing that on any document, or is that just your
14 opinion?

15 A. I base that on what has been the long-held
16 policy and practice of the county, that funds that
17 would come in through a county program would be
18 governed under those county rules.

19 Q. Okay.

20 A. These were not funds that were raised from
21 outside sources. These were funds that were raised as
22 a part of an ongoing court case. So I very much
23 considered those funds to be government funds. They
24 were held in the nonprofit whose mission was to support
25 the program.

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1 Q. Okay. If a -- let's say some parents are in
2 court, they're getting a divorce, and the court says,
3 "You need to appoint a guardian ad litem to represent
4 the interests of your child. So, in order to do that,
5 you're going to need to write a check to Friends of
6 Clayton County CASA." And the parents said, "We don't
7 want to do that. We don't have the money. We don't
8 want to spent the money," whatever the case may be.
9 Would that child simply be unrepresented? How would
10 that -- how would that work?

11 MR. HILL: Objection, calls for speculation.

12 MR. BUCKLEY: Well, he understands the
13 workings of the court better than I do.

14 BY MR. BUCKLEY:

15 Q. So go ahead and give me your best answer.

16 A. Well, and this is completely speculation
17 because --

18 Q. All right.

19 A. -- I was never involved in the superior
20 court cases myself.

21 Q. Right.

22 A. I would assume that the court has the
23 authority to waive the fee, if you're talking about
24 someone who is truly destitute and can't pay the fee.
25 I think the court's interest would probably be to make

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1 sure that that child's interests are properly
2 represented rather than allowing, you know, a parent's
3 inability to pay to interrupt that.

4 Q. So would Clayton County CASA or Friends of
5 Clayton County CASA be required and expected to provide
6 a guardian ad litem for that child notwithstanding the
7 failure or refusal to pay the fee?

8 A. Well, the Friends of Clayton County CASA do
9 nothing to provide guardian ad litem. The Clayton
10 County CASA program, which is --

11 Q. Excuse me. Right.

12 A. They would provide that guardian ad litem in
13 any situation where a judge has issued an order doing
14 so.

15 Q. They would do that regardless of whether the
16 parents were able or willing to pay the fee?

17 A. Absolutely.

18 Q. Okay. All right. So you were at an event
19 at Chili's in Clayton County where volunteers were --
20 they appeared. Volunteers were dined, I guess, as part
21 of the Duck Derby event, which, as I understand it, the
22 Duck Derby is an annual fundraising event designed to
23 raise money for Friends of Clayton County CASA;
24 correct?

25 A. Yes, sir.

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1 Q. Okay. And the Friends of Clayton County
2 CASA paid for that dinner, as far as you know; right?

3 A. As far as I know.

4 Q. Okay.

5 A. I don't know for sure.

6 Q. And while you don't necessarily view it as a
7 proper expenditure of funds with respect to alcohol,
8 there was nothing in the MOU that expressly prohibited
9 expenditure of funds for alcohol, was there?

10 A. No, sir. If the Friends of Clayton County
11 CASA out of the separate funds that they raise through
12 their fundraising events wanted to provide alcohol,
13 that's their business. If the GAL funds, the funds
14 collected through the GAL program were used to purchase
15 alcohol, I would consider that improper.

16 Q. Were the funds that are collected from the
17 GAL program that go to Friends of Clayton County CASA
18 kept -- to your knowledge, were they kept in a separate
19 account from other funds raised by Clayton County CASA,
20 say through the Duck Derby or otherwise?

21 A. To my knowledge, Friends of Clayton County
22 CASA held three accounts.

23 Q. Okay.

24 A. One for the GAL funds. One was sort of
25 their general, I guess, fundraising event, you know,

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1 where they deposited those sorts of things. And then
2 there was a separate account, I believe, for the
3 Ambassadors Behind CASA, which was sort of an ancillary
4 support organization that helped raise funds. I think
5 they focused more on doing things for the children. I
6 know they supported like a Christmas like luncheon and
7 gift giveaway, that kind of thing.

8 Q. Let me make sure I get all these right. So
9 there's the Ambassadors --

10 A. Right. We called it the ABC.

11 Q. And those don't sound like court events that
12 the Ambassadors are involved in --

13 A. No, it's --

14 Q. -- so much as --

15 A. -- completely separate.

16 Q. -- doing things for the kids.

17 A. Yes.

18 Q. And then what were the other two funds
19 you --

20 A. I don't know that it had a name other than
21 Friends of Clayton County CASA. It was their sort of
22 general operating fund.

23 Q. Okay.

24 A. And my understanding is the funds from the
25 Duck Derby, for instance, that's where those funds

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1 would go, and the expenses for those events would come
2 out of that account.

3 Q. Do you know if the Friends of Clayton County
4 CASA general operating fund only had -- you know, was
5 only funded by the \$500 fees that were paid into court
6 or whether there were other fundraising activities that
7 funded that operating account?

8 A. No, the --

9 MR. HILL: I object to form.

10 BY MR. BUCKLEY:

11 Q. Go ahead.

12 A. The funds raised from the GAL account should
13 have been deposited in that account that was designated
14 for those funds. That was the first account I
15 mentioned.

16 Q. That's the general operating fund?

17 A. No, sir. That's the GAL account.

18 Q. GAL account.

19 A. I believe it was Friends of Clayton County
20 CASA. It was a DBA, and I don't remember if it was
21 just called Guardian Ad Litem or GAL. That's where
22 those funds were supposed to be deposited.

23 Q. GAL. I'm sorry.

24 A. GAL, yes, sir.

25 Q. Guardian Ad Litem.

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1 A. Right.

2 Q. So, to be clear, there was a separate
3 Guardian Ad Litem account expressly for the purpose of
4 funding guardian ad litem activities in the court;
5 right?

6 A. Correct, supporting those, yes, sir.

7 Q. And that account was funded by the \$500 fees
8 that would be paid by the parents under the direction
9 of the court.

10 A. That's right.

11 Q. Okay. And, as far as you know, no other --
12 there was no other source of funds for that account
13 other than that court ordered fee?

14 A. There -- to my knowledge, there wasn't.
15 That's --

16 Q. Okay.

17 A. -- the sole funding mechanism for that
18 account, as far as --

19 Q. So the other -- you know, I forgot to
20 mention a couple of things to you. And I just did it
21 myself, so I apologize. But if you're answering a
22 question and I cut you off in the middle of an answer,
23 that's inadvertent.

24 A. Okay.

25 Q. You just tell me, and I'll let you finish

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1 your answer because I want your answer to be complete.
2 I just think you're finished, and I'm moving on. By
3 the same token, if you cut me off, I'll tell you
4 because sometimes you'll anticipate my question; right?
5 So if you cut me off, I'll say, "Hey, wait a minute,"
6 and I'll finish my question. All right? Are we
7 agreed?

8 A. Yes, sir.

9 Q. Okay. So, okay. And so in terms of the
10 general operating fund, that's different from the GAL
11 account; right?

12 A. Correct.

13 Q. And the Friends of Clayton County general
14 operating account was funded, to your knowledge,
15 through separate fundraising?

16 A. That's correct.

17 Q. Okay.

18 A. Such as the Duck Derby. There were some
19 other, you know, events that would happen. And I
20 believe people, you know, just citizens would make a
21 single donation or that kind of thing.

22 Q. Okay. And do you have the same concerns
23 about expenditure of funds for alcohol, for instance,
24 out of the general operating fund? Is that -- do you
25 have concerns that that's inappropriate too in the

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1 scope of volunteer recruiting, training, and retention?

2 A. I have a general -- and this is just sort of
3 a general feeling, that when we're doing activities
4 that are supporting a county program, alcohol should
5 probably be kept to a minimum.

6 Q. Right.

7 A. But at the same time, to answer your
8 question directly, that would be a decision that the
9 board of the Friends would have to decide on. I
10 don't feel like I necessarily have any sort of
11 governing authority over that decision.

12 Q. Right. Would that also be true, for
13 example, in the -- so the general operating fund, which
14 is funded by basically charitable donations, the use of
15 those funds in the normal course of business would be
16 up to the board; right?

17 A. Correct, within the parameters of its
18 mission and, you know, the scope of -- legal scope, of
19 course, of --

20 Q. Right.

21 A. -- spending money that's charitable
22 donations.

23 Q. But that in the normal course would not have
24 been something that the court would have oversight of.

25 A. Not oversight, no, sir.

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1 Q. Okay. And so even, for example, if they
2 decided that it was in furtherance of the mission of
3 Friends of Clayton County CASA to sponsor a softball
4 team where volunteers might be recruited, that would be
5 within the scope of acceptable behavior by the board.

6 A. It would be a board decision. I think, to
7 answer that question, it would depend on the context
8 around say the softball league or whatever other event
9 they might be sponsoring.

10 Q. Right. Okay.

11 A. If the event that they're sponsoring or the
12 entity that they're sponsoring is going to lead to
13 volunteers within the county, that -- yeah, that would
14 be okay.

15 Q. Or could lead to volunteers, because you
16 never know whether you're going to get a volunteer
17 until they say, "Yeah, I'm in." Right?

18 A. That's right.

19 Q. So there are recruiting events where people
20 are -- maybe they have dinner or maybe there's
21 conversation, and at the end of it some of them say,
22 "Hey, I'd like to volunteer," and some people say, "Not
23 for me." Right?

24 A. Right.

25 Q. And you don't really know. I mean, you're

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1 still -- you're still going to have the event in the
2 hope that there will be volunteers that come out of
3 that event. That's what they were doing, right, at
4 Friends --

5 A. I believe --

6 Q. -- of Clayton County?

7 A. -- that was their intention. I mean, I
8 can't say for sure. But I think I would say that
9 there's some qualifiers for determining whether or not
10 an event is likely to lead to volunteers. I mean, I
11 certainly wouldn't come up here and attempt to recruit
12 volunteers for a program where somebody's going to have
13 to go to court in Clayton County routinely or see kids
14 in Clayton County routinely. I'm going to focus my
15 volunteer efforts in directly around the county.

16 Q. When you say "up here," you're talking about
17 Marietta?

18 A. In Atlanta, yes.

19 Q. Atlanta?

20 A. Yeah. Well --

21 Q. I thought maybe you were talking about
22 Marietta.

23 A. Outside of -- you know, outside of Clayton
24 County where it's not a quick drive to the courthouse.

25 Q. Right. But there was no rule that said that

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1 volunteers from Atlanta could not be accepted into the
2 Friends of Clayton County --

3 A. I don't believe there was --

4 Q. -- CASA.

5 A. -- any residency requirement that said you
6 had to like be a Clayton County citizen --

7 Q. Right.

8 A. -- to participate in the program.

9 Q. Okay. All right. Let me ask you a few
10 questions about your preparation for the deposition
11 here today, and then I'm going to ask you a few
12 personal questions just so I can know who you are.

13 A. Okay.

14 Q. We've barely started. All right? So what
15 did you do to prepare for your deposition? And in
16 answering that question, you can tell me that you met
17 with the lawyers, but don't tell me what they said.

18 A. Right.

19 Q. Okay?

20 A. I did meet with Michael and Bill --

21 Q. Okay.

22 A. -- on Wednesday. And yesterday primarily I
23 reviewed some documents that were part of the
24 investigation, if you will.

25 Q. All right. How long did you meet with

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1 Michael and Bill?

2 A. I believe it was about four hours or so,
3 maybe four and a half.

4 Q. Okay. And then you said you reviewed some
5 documents did you say yesterday?

6 A. Yesterday, yes, sir.

7 Q. Okay. What documents did you review?

8 A. The MOU between the superior court and the
9 county, the juvenile court, a memo that I had written
10 to a DA's investigator. I think his name is Allen
11 Crenshaw. I reviewed several other memos. I believe
12 most of them were between Mr. Johnson and either to
13 Mr. Bostock, or I think there was one -- a memo that I
14 wrote to Mr. Johnson. I went through a lot of papers.
15 It's hard for me to remember exactly what all of them
16 were. But all of those were part of our investigative
17 file that was held from when all of that occurred in
18 2013.

19 Q. Did you review any emails or text messages?

20 A. Not text messages. I believe there was an
21 email or two.

22 Q. Okay. When this -- this litigation has been
23 going on for a while, as you know; right?

24 A. Yes, sir.

25 Q. When this litigation was started, was there

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1 any internal directive to preserve any documents that
2 would have to do with Gerald Bostock or his claims?

3 A. We did receive -- when I say we, the
4 juvenile court -- Mr. Johnson was the director at the
5 time -- received a letter from the firm representing
6 the county instruct --

7 Q. Freeman, Mathis & Gary?

8 A. Yes, sir, instructing us -- you know,
9 informing us of the litigation and instructing us to
10 take action to preserve --

11 Q. Do you have --

12 A. -- documents.

13 Q. Okay. I cut you off. I'm sorry.

14 A. That's okay.

15 Q. Go ahead. Finish.

16 A. No, just to preserve the documents related
17 to this case.

18 Q. Okay. Did you act accordingly?

19 A. I didn't -- I preserved what I had --

20 Q. Right.

21 A. -- at the time I was the chief of staff.

22 And Mr. Johnson certainly, he didn't throw out anything
23 from the investigative file that I'm aware of because
24 we have a pretty complete file.

25 Q. Do you have a county issued cell phone that

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1 you use?

2 A. I do.

3 Q. Okay. And has that been the case the entire
4 time you were chief of staff?

5 A. Yes, sir.

6 Q. What's that cell phone number?

7 A. It's (678) 409-9293.

8 Q. Do you ever communicate by text message on
9 that phone about county business?

10 A. Yeah, I have quite a bit in the past. I
11 don't use that phone presently very often.

12 Q. Okay. You still have it though?

13 A. I still have it.

14 Q. Did you preserve any text messages that you
15 had concerning Gerald Bostock on that phone?

16 A. I don't recall there ever being text
17 messages. And if they had been, I have a practice of
18 periodically going through and deleting texts that are
19 no longer relevant, so I don't recall. In 2013, I
20 didn't have that particular phone anyway. I had -- I
21 don't know. It may have been a Blackberry or an
22 Android phone.

23 Q. Okay.

24 A. So --

25 Q. What happened to that Blackberry or Android?

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1 A. The county rotates through updates -- or
2 upgrades technology periodically, so it would have been
3 turned in to the county Information Technology
4 division. I don't -- I have no clue what they do with
5 the old devices.

6 Q. When you got the memo or letter from
7 Freeman, Mathis & Gary, did you still have the old
8 phone, your Blackberry or whatever it was?

9 A. I'm not a hundred percent sure when I got
10 the current phone that I had or the -- I had an iPhone,
11 the previous generation.

12 Q. Okay.

13 A. I want to say that would -- I would have
14 gotten that sometime after we moved into our building,
15 for some reason I remember that, which would have been
16 September 12. I don't know.

17 Q. September 12 of what?

18 A. 2012. I'm sorry.

19 Q. Okay.

20 A. But that was the change from the Blackberry.
21 I think there was an Android phone in between there,
22 and then I had an iPhone. I think I've had two other
23 iPhones since then. So they change or upgrade the
24 phones about every two to three years.

25 Q. Do you recall this directive concerning

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1 documents, the preservation of documents, do you recall
2 it instructing you to preserve all text messages?

3 A. It may have. I don't recall that --

4 Q. Okay.

5 A. -- per se.

6 Q. But it sounds like you, notwithstanding
7 that, may have deleted some?

8 A. That would have been done contemporaneously
9 and prior to -- when I received -- when Mr. Johnson
10 shared that letter with me, there were no text messages
11 on my phone at that time about anything to do
12 with Mr. Bostock.

13 Q. So there --

14 A. That I recall.

15 Q. Was that at or about the time that the
16 lawsuit was filed?

17 A. I assume it would have been right after the
18 lawsuit was filed --

19 Q. Okay.

20 A. -- once the county received notice.

21 Q. Okay. So Mr. Bostock was terminated on
22 June 3rd, 2013.

23 A. Correct.

24 Q. Okay. Were you in the new building then?

25 A. Yes, sir. We had been there for about six,

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1 eight months, something --

2 Q. Okay.

3 A. -- like that.

4 Q. And do you think at that point you had your
5 iPhone as opposed to your Android or Blackberry, or
6 you're not sure?

7 A. I'm not sure. If I had to say, I would have
8 probably have had the Android at that time.

9 Q. Okay. But you turned that in?

10 A. Yes, sir. That was turned over to IT when
11 they issued the first iPhone.

12 Q. When you communicated -- did you ever
13 communicate by telephone with Mr. Johnson or Judge
14 Teske, or anybody for that matter, about the events
15 leading up to Gerald's termination? Did you ever talk
16 on the phone with anybody?

17 A. I can't say that I didn't. I would say that
18 the vast majority of the communication about the issues
19 during that time was in face-to-face meetings.

20 Q. Okay.

21 A. But there may have been a phone call
22 answering a question or something. I don't recall.

23 Q. Okay. And any -- if you still had -- if
24 those communications were on your Android or
25 Blackberry -- by the way, those are two very distinct

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1 kinds of phones. So you're not sure which one it was?

2 I mean --

3 A. I mean, we're talking --

4 Q. -- Blackberry has the little buttons,
5 elevated buttons --

6 A. Correct.

7 Q. -- and whatnot.

8 A. But, you know, what are we, nine years out?
9 I can't remember --

10 Q. Okay.

11 A. -- a granular detail eight, nine years ago.

12 Q. Right. I remember my Blackberry.

13 A. I just --

14 Q. I hated it, but that's why I remember it.

15 A. I loved my Blackberry. I wish we'd have
16 never gotten rid of it. But I do -- all I really --
17 the reason I remember the Android so vividly is that
18 there was this attempt by the county to use Android
19 phones, and it failed miserably, and they switched
20 within pretty short form to iPhones from the
21 Blackberry. So there was the Blackberry, the Androids,
22 and then the iPhones came -- that's why I even remember
23 the Android. I didn't have it for but a few months
24 honestly.

25 Q. So you may have turned -- in other words, at

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1 the time the suit was filed, you believe you may have
2 still had the previous phone, but you would have turned
3 it in to IT in order to get your new phone.

4 A. When the suit was filed, I had an iPhone at
5 that point.

6 Q. Okay. What about when the EEOC charge was
7 filed? You would have probably still had the Android
8 or the Blackberry; right?

9 A. Probably the Android. Or we may have -- I
10 don't remember how far out from the termination that
11 occurred, but --

12 Q. Okay.

13 A. -- depending on when it was, I may have
14 had -- I don't recall exactly.

15 Q. That letter from Freeman, Mathis & Gary, did
16 it -- did you receive it, or did it come to your inbox
17 at or about the time that the EEOC charge was filed, or
18 was it at or about the time that the lawsuit was filed?

19 A. I'm going to assume it was about the time
20 the lawsuit was filed.

21 Q. Okay.

22 A. I don't -- I had nothing -- I don't recall
23 having anything to do at all with the EEOC filing and
24 hearing that occurred, and I'm not sure about the time
25 line of how those things played out.

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1 Q. Okay. All right. So let me go back and
2 just get a little bit of personal background on you.
3 Okay. First of all, Mr. Slay, what is your home
4 address?

5 A. It's REDACTED
6

7 Q. So you actually live outside of Clayton
8 County; right?

9 A. No, sir, I'm in -- I'm in downtown
10 Jonesboro.

11 Q. Okay. All right. So you are in Clayton
12 County.

13 A. Yes, sir.

14 Q. All right. How long have you lived there?

15 A. 9 -- coming up on 19 years.

16 Q. Married or single?

17 A. Married.

18 Q. What's your wife's name?

19 A. Catherine Slay.

20 Q. Katherine with a K?

21 A. C.

22 Q. Do you have children?

23 A. I do have one daughter.

24 Q. Is she over 18?

25 A. No, sir. She's 17.

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1 Q. 17. She may come of age before we try this
2 case. What is her name?

3 A. REDACTED Slay.

4 Q. And that's your only child?

5 A. Yes, sir.

6 Q. Okay. Do you have relatives who live in the
7 metropolitan Atlanta area?

8 A. I do.

9 Q. Okay.

10 A. My mother and father and my father-in-law.
11 I have several aunts and uncles and --

12 Q. Okay.

13 A. -- some cousins as well that --

14 Q. Let's walk through them pretty quickly.
15 Okay. Tell me your mom and dad's name and where they
16 live.

17 A. It's Charles and Kristin, with a K, Slay.
18 And they live in Forest Park.

19 Q. And you said your father-in-law lives in --

20 A. He's in Peachtree City.

21 Q. Okay. Peachtree City. What's his name?

22 A. Raymond Fust, F-u-s-t.

23 Q. Do you have any siblings who live in
24 metropolitan Atlanta?

25 A. I don't. My brother, only brother, lives in

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1 Colorado.

2 Q. Okay. How about does -- does Raymond have
3 any children that live in metropolitan Atlanta?

4 A. He does. He has two, my wife and my
5 brother-in-law, who lives outside of downtown -- or the
6 City of Jonesboro, but it's a Jonesboro address.

7 Q. So your -- and your brother-in-law is who?

8 A. William Fust, F-u-s-t.

9 Q. Okay. And you said you had perhaps some
10 aunts and uncles that live in metropolitan Atlanta?

11 A. Yes, sir. I've got one on my mom's side --
12 well, one aunt on my mom's side and my uncle on her
13 side. And then there are one, two -- three aunts and
14 uncles on my father's side that live in the metro area.

15 Q. Let's run down that list, if we can.

16 A. Okay.

17 Q. Give me the names of those folks.

18 A. So my aunt on my mom's side is Linda Ellis.
19 She lives in Atlanta.

20 Q. Okay.

21 A. My uncle is Kenneth Crook. He lives in
22 Newnan. Well, no, Sharpsburg.

23 Q. Okay.

24 A. I have an Aunt Gail, Shelton is her last
25 name, and she lives in Stockbridge.

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1 Q. Okay.

2 A. An uncle, Douglas Slay. He also lives in
3 Stockbridge.

4 Q. Okay.

5 A. And then another uncle, Randy Slay, and he
6 lives in Jefferson. That's probably outside of metro
7 Atlanta, but --

8 Q. Okay. Anybody else you can think of?

9 A. No. I believe everybody else is in North
10 Carolina and Alabama.

11 Q. Okay. So --

12 A. Florida.

13 Q. -- if you in the course of testifying
14 remember there's a stray relative in metropolitan --

15 A. Okay.

16 Q. -- Atlanta, let me know, would you?

17 A. Well, my brother -- my dad had seven
18 siblings, so --

19 Q. Okay.

20 A. But they're scattered all over.

21 Q. They're not in metro Atlanta?

22 A. I don't -- no. Two of them live in Florida,
23 one's in Alabama, and one's in North Carolina, I
24 believe.

25 Q. All right. Let's get a little bit about you

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1 personally. How old you are, sir?

2 A. 45.

3 Q. Where are you from originally?

4 A. Clayton County, born in Forest Park -- well,
5 born in Riverdale technically at the hospital but grew
6 up in Forest Park.

7 Q. Where did you go to high school?

8 A. Forest Park High School.

9 Q. Graduate there?

10 A. Yes, sir.

11 Q. Any college education?

12 A. Yes, sir.

13 Q. Okay. Tell me about that.

14 A. Georgia State University.

15 Q. Did you get a degree?

16 A. I did, bachelor degree in criminal justice.

17 Q. What year did you get that degree?

18 A. Would have been 1998.

19 Q. All right. And have you got any
20 postgraduate work?

21 A. I was part of a fellowship program with the
22 Annie E. Casey Foundation. The name of the program was
23 the Applied Leadership Network.

24 Q. Applied Leadership, was that -- I've heard
25 of Annie E. Casey. Is that related to the Carnegie

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1 Institute, or am I --

2 A. It's actually named after the founder of
3 UPS's sister.

4 Q. Okay.

5 A. That was her name.

6 Q. All right. And it's called the Applied
7 Leadership Institute?

8 A. Network.

9 Q. Network. Is that out of Atlanta or where?

10 A. Baltimore.

11 Q. Okay. Did they have a program in metro
12 Atlanta, or did you go up to Baltimore for it?

13 A. Went to Baltimore mostly. They also -- I
14 mean, we also did seminars in New York City, Seattle,
15 and I believe Memphis --

16 Q. Was this --

17 A. -- if I remember.

18 Q. -- any of this online?

19 A. No, sir, it was all in person. This was
20 done in 2010 and '11, so it was kind of before the
21 online --

22 Q. Did you get a --

23 A. -- stuff.

24 Q. -- degree or certification as a result of
25 this?

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1 A. I would call it a certification. I mean, I
2 finished the program, got a cert -- you know, a
3 certificate from it.

4 Q. And what were you certified as or to do?

5 A. Well, as the name implies, it was a
6 leadership building program, a leadership skill
7 building program. And it was specifically oriented
8 around juvenile justice reform work. It's part of an
9 initiative of the foundation called the Juvenile
10 Detention Alternatives Initiative. You often hear that
11 referred to as JDAI.

12 Q. The acronym basically suggesting that the
13 program tries to encourage or foster alternatives to
14 juvenile detention?

15 A. Correct.

16 Q. That will remediate behavioral problems in
17 juveniles?

18 A. That, and it's all based around research
19 that shows sort of the dangers of detaining the wrong
20 kids or overusing detention and the negative impacts
21 that can have on those youth and their prospects in the
22 future. And that's what JDAI is. And the Applied
23 Leadership Network is around building up leaders to
24 further the JDAI work, if that makes sense.

25 Q. Who paid for you to attend this program?

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1 A. The Casey Foundation.

2 Q. Okay. So was it sort of a scholarship or
3 what? Did you apply for it?

4 A. I did apply. There's no cost to
5 participate. They cover all of the travel, and so
6 basically my contribution was my time.

7 Q. Okay. So the Clayton County Juvenile Court
8 was not involved in any way in your being in this
9 program?

10 A. Other than allowing me the liberty to go to
11 the seminars --

12 Q. Okay.

13 A. -- to participate.

14 Q. So you graduated. You got your bachelor's
15 in 1998. When did you go to work for Clayton County?

16 A. January 4th, 1999. And I actually interned
17 with the court as part of the -- of my senior year in
18 the bachelor's program.

19 Q. And when you did, when you went to work for
20 Clayton County, you went to work for the juvenile
21 court?

22 A. Yes, sir, as a probation officer.

23 Q. Okay. And so let's -- you were basically a
24 freshly minted college graduate then. You -- so you
25 started as a probation officer in the juvenile court.

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1 What I'm going to do now is we're going to try and walk
2 through your different jobs --

3 A. Okay.

4 Q. -- up to the present. Okay?

5 A. Yes, sir.

6 Q. So what was -- how long did you hold the
7 position of a juvenile court probation officer?

8 A. I believe it was about three years, and then
9 I was promoted to the supervisor of one of the
10 probation units.

11 Q. So that would be in or about 2002?

12 A. Yes, sir, 2002 or 2003, somewhere in that
13 time frame.

14 Q. You were promoted to be supervisor --

15 A. I think the title was actually called
16 probation supervisor at the time.

17 Q. Probation supervisor. That was a bump up in
18 pay, I assume?

19 A. A little bit.

20 Q. Okay. Not nearly enough though.

21 A. No, sir.

22 Q. Right. All right. So then you're probation
23 supervisor. For what period of time were you probation
24 supervisor?

25 A. I believe I was in that position until 2007.

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1 And at that time I was promoted into a position called
2 the JDAI coordinator.

3 Q. JD --

4 A. -- AI coordinator.

5 Q. -- AI.

6 A. It's an acronym for the Juvenile Detention
7 Alternatives Initiative.

8 Q. Is that about when you were taking this
9 certification or just received your certification?

10 A. That was actually before I did that. I did
11 that a couple of years after that. So I went
12 through -- I know I went through the fellowship program
13 in 2010 and '11.

14 Q. Okay. So you're JDAI coordinator starting
15 in 2007, and for what period of time did you hold that
16 position?

17 A. For about 18 months. Sometime in 2009 I was
18 promoted to chief of staff.

19 Q. Is that the position you hold today?

20 A. No, sir. I am now the director of juvenile
21 court operations.

22 Q. Okay. When did you get that promotion?

23 A. That would have happened in 2018.

24 Q. Okay. So was there any other position
25 between your position of chief of staff and your

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1 position of director of juvenile court operations?

2 A. Not really a different position. That chief
3 of staff position was reclassified, was given a
4 different title.

5 Q. What was that?

6 A. Director of programs and resource
7 development.

8 Q. And when did that reclassification happen?

9 A. I believe it was I'm going to say around
10 2015. I don't recall exactly, but somewhere in that
11 area.

12 Q. Okay. Was there any change in job duties or
13 an expansion of job duties, or it was just a change in
14 job title?

15 A. There was a restructure in the court at that
16 time, and my responsibilities moved more on the program
17 side of the court. So -- and resource development was
18 essentially looking for grant funding and other, you
19 know, opportunities to partner with community partners
20 or other organizations and to develop those --

21 Q. Okay.

22 A. -- collaborations.

23 Q. I want to go -- so at the time that
24 Mr. Bostock was terminated, you were chief of staff?

25 A. I was chief of staff at that time.

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1 Q. Okay. Let's focus on that for a bit. So --
2 and that's from 2009 to 2018; right?

3 A. Right, with the --

4 Q. Well, with the --

5 A. -- with the reclassification, yes, sir.

6 Q. -- the reclassification. But it sounds to
7 me like, at least at the time that Gerald was
8 terminated, you were still --

9 A. It was chief of staff.

10 Q. -- called chief of staff.

11 A. Yes, sir.

12 Q. Right. Okay. So let's focus on that for a
13 minute as chief of staff. I want to get clear on your
14 reporting relationships during that period of time.
15 First of all, who did you report to when you were chief
16 of staff?

17 A. John Johnson. He was the director of court
18 operations at that time.

19 Q. Director of juvenile court operations?

20 A. Yes, sir. Court administrator is probably
21 more how that would be commonly understood.

22 Q. Well, have you taken Mr. Johnson's place in
23 your promotion now?

24 A. Yes, sir. When he -- he retired --

25 Q. Okay.

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1 A. -- the summer of 2018, and I took over that
2 position.

3 Q. Are you ever called now, in your role as
4 director of juvenile court operations, are you ever
5 called court administrator?

6 A. (Witness nods head affirmatively.)

7 Q. It's the same.

8 A. Yeah.

9 Q. Right?

10 A. Right.

11 Q. Okay. Depends on who's calling you and --

12 A. Yeah. And, you know, in some jurisdictions
13 that's what they are officially titled, but --

14 Q. Okay. All right. So as chief of staff, you
15 reported to Johnson. And was that consistent
16 throughout the time that you were chief of staff?

17 A. It was.

18 Q. Okay. And who reported to you? I'm
19 interested, first of all, in positions --

20 A. Right.

21 Q. -- that reported to you, and then we'll get
22 into names.

23 A. Okay.

24 Q. All right? So tell me the positions that
25 reported to you.

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1 A. So the chief of Child Welfare.

2 Q. Okay.

3 A. The chief of Field Operations, the Clerk of
4 Court, the Restorative Justice Division.

5 Q. Restorative Justice Division?

6 A. Yes, sir. The JDAI coordinator, the chief
7 of Special Juvenile Justice Programs. Kind of going
8 through my head and making sure I'm not leaving out
9 anyone.

10 Q. Yep.

11 A. Oh, the grants coordinator and the court's
12 IT coordinator.

13 Q. And I want to be clear. All of these
14 different positions reported to you while you were
15 chief of staff; right?

16 A. Yes, sir.

17 Q. Okay. Which one of these positions was held
18 by Gerald Bostock? Did he report directly to you?

19 A. He did.

20 Q. Okay.

21 A. The chief of Child Welfare.

22 Q. Okay. And then John Johnson, who did he
23 report to? Did he report to Judge Teske?

24 A. He did.

25 Q. Mr. Teske was called chief judge --

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1 A. He's chief judge, yes, sir, sort of the
2 administrative judge.

3 Q. And Judge Teske was, with respect to
4 Gerald's termination, he was the decision maker on
5 that; correct?

6 A. Judge Teske was the final decision maker,
7 yes, sir.

8 Q. Okay. Did you make any recommendation to
9 Judge Teske one way or the other with respect to
10 Gerald, I mean, being terminated?

11 A. I didn't make a direct recommendation. The
12 recommendation was made by Mr. Johnson.

13 Q. Okay.

14 A. But I was involved in the conversations with
15 Mr. Johnson and, of course, with Judge Teske as well.

16 Q. I just want to be clear because what I asked
17 is did you recommend that Gerald be terminated. Did
18 you recommend -- and I'm asking you a direct question
19 about a direct thing. Did you recommend to Judge Teske
20 that Gerald be terminated, yes or no?

21 A. I concurred with the recommendation that was
22 on the table is the way I would characterize it.

23 Q. Okay.

24 A. I don't recall saying Mr. Bostock should be
25 terminated.

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1 Q. Okay.

2 A. There was conversation. We talked about it.

3 I concurred with the consensus.

4 Q. Did you recommend to Mr. Johnson that

5 Mr. Bostock be terminated?

6 A. Not directly.

7 Q. Okay. You provided Johnson with information

8 that led to Mr. Bostock's termination?

9 A. I didn't, no.

10 Q. You did not?

11 A. I didn't provide any --

12 Q. Okay.

13 A. -- information to him. That decision was

14 based on the results of the audit primarily.

15 Q. Okay. And we'll look at that audit document

16 in a bit. Is that what -- is that document what was

17 relied on in terminating Gerald?

18 A. Primarily, yes, sir.

19 Q. Okay. And when I say "was relied on," based

20 on your knowledge of what was relied on --

21 A. Yeah.

22 Q. -- that audit document was --

23 A. Yeah, it was the genesis of what led to the

24 termination, yes, sir.

25 Q. All right. Okay. So -- and when you say

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1 you concurred, of course, both Teske and Johnson were
2 your boss; right?

3 A. Yes, sir.

4 Q. Okay. So there's a certain amount of self
5 interest in concurring with decisions that your bosses
6 make. Fair?

7 A. Generally speaking, yes. I would add,
8 though, that I never felt like I couldn't give my own
9 opinion or that it wouldn't be listened to or that I
10 would in any way like be chastised or punished for --

11 Q. Right.

12 A. -- dissent or something like that. I had a
13 very good relationship with both of them.

14 Q. What I want to be clear on is you weren't
15 spearheading the drive to terminate --

16 A. No, sir.

17 Q. -- Gerald? Okay.

18 A. Not in that way, no, sir.

19 Q. Were you involved in furnishing information
20 for the audit?

21 A. I was involved in a conversation with Stacey
22 Merritt and John Johnson, and I believe Leslie Moore
23 was in that -- part of that conver -- I don't remember
24 if she, honestly, was there. I do recall Stacey
25 Merritt and sharing information. I didn't produce any

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1 documentation that I recall.

2 Q. Right. Now, the issue in the audit, there
3 was an audit of Friends of Clayton County CASA funds.
4 Am I correct about that?

5 A. Correct. It focused on that GAL account
6 specifically.

7 Q. Okay. Did Gerald, in his position as chief
8 of Child Welfare, have any oversight over any
9 government funds?

10 A. He -- there were at least two grants, one of
11 which was from a government entity. At that time I
12 believe it was called the Criminal Justice
13 Coordinate -- no, that's what it is now. It may have
14 been called Children Youth Coordinating Counsel, I
15 believe. The name of the entity's changed several
16 times --

17 Q. Okay.

18 A. -- in the years. And then there was another
19 grant from Georgia CASA, which is a nonprofit --

20 Q. This was --

21 A. -- that partially funded Mr. Bostock's
22 salary.

23 Q. Okay. So these were grants to the
24 government, to the Clayton County --

25 A. To the juvenile court, yes, sir.

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1 Q. Juvenile court. Okay. And there was no
2 finding of any improper handling of any of that grant
3 money by Mr. Bostock?

4 A. No. And just to clarify, he was in charge
5 of the programming aspect of the grants. And there --
6 I'm sure there were financial aspects to it, but it's
7 not like, you know, that he had received a check from
8 the government entity and had funds to spend. There
9 were funds that were reimbursed to the county --

10 Q. Right.

11 A. -- off of that grant.

12 Q. Yeah.

13 A. But that was all handled through the county
14 finance department.

15 Q. Okay. Now, I've looked at -- you did
16 Gerald's performance reviews for a period of time;
17 right?

18 A. I did a few of them, yes, sir.

19 Q. Okay. I looked at them. They were all very
20 favorable.

21 A. Yes.

22 Q. Best of your recollection; right?

23 A. Yes, sir.

24 Q. And we'll look at them today; but, I mean,
25 generally -- I mean, with maybe one or two exceptions,

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1 it was all 4s and 5s, which are the highest marks he
2 could get as an employee; correct?

3 A. That's right.

4 Q. Okay. Did you get along with Gerald?

5 A. I always felt like I had a good professional
6 relationship with Mr. Bostock.

7 Q. Okay. All right.

8 A. There were times, you know, where we were
9 dealing with management issues primarily around
10 employees where we didn't always agree on things, but
11 it was always professional.

12 Q. It was a -- well, where two or three
13 professionals are gathered together, there is always
14 disagreement, although not necessarily discord; right?

15 A. Correct, yes.

16 Q. Okay. In your handling of any disagreements
17 that you all had, he conducted himself professionally,
18 and you conducted yourself professionally; right?

19 A. I always felt that way, yes, sir.

20 Q. Okay. And it looks to me from your
21 performance reviews as if those, whatever those
22 disagreements were, they didn't strongly impact his
23 performance reviews.

24 A. No, they -- if you want to call them
25 negative marks or remarks, it was really more like

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1 corrective sort of criticism or, you know, suggestions.
2 And it was all focused primarily around his
3 relationship with his subordinates.

4 Q. Right.

5 A. There had been some tension within the unit.

6 Q. Okay.

7 A. Some accusations of things like favoritism,
8 micromanagement, those sorts of things.

9 Q. Right.

10 A. So --

11 Q. Okay.

12 A. -- my interaction in that regard with
13 Mr. Bostock was more, "Hey, here are some things that
14 you can try, please do this differently," that kind of
15 stuff. It wasn't --

16 Q. He had quite a number of people that he was
17 supervising, including a whole bunch of volunteers;
18 right?

19 A. Yeah. I believe the number probably would
20 have been eight to ten people, depending on the time
21 frame.

22 Q. Okay.

23 A. And then the volunteers reported to those
24 individuals.

25 Q. Right. These criticisms, the discussions

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1 you had surrounding his interactions with his personnel
2 were more in terms of what you would probably describe
3 as constructive criticism. Fair?

4 A. Yeah, I would -- that's fair.

5 Q. I'm sure anybody who's a leader, there's
6 always somebody who's going to say that they're not as
7 good as they should be; right?

8 A. Absolutely.

9 Q. And that's happened to you, I'm sure.

10 A. Sure, sure.

11 Q. Right? Okay. Have you ever received
12 constructive criticism with respect to your
13 interactions with your subordinates?

14 A. I'm sure, you know, a suggestion has been
15 made to me.

16 Q. Right.

17 A. I've never -- never really had the sort of
18 problem with my subordinates that Mr. Bostock ran into,
19 not -- especially not in any --

20 Q. Okay.

21 A. -- kind of large scale where it was
22 involving multiple people. I mean, there have been a
23 few difficult employees through the times --

24 Q. Yeah.

25 A. -- but --

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1 Q. Okay. And sometimes those, quote,
2 criticisms of leadership are as much a result of the
3 personality of the criticizer as of the leader.

4 A. Sometimes, yeah.

5 Q. Yeah. So -- and we'll talk about Mr. Black.

6 A. Okay.

7 Q. Mr. Black is the guy who wrote a memo after
8 he -- wasn't it after he was terminated that criticized
9 Gerald?

10 A. It was an email. And just to clarify,
11 Mr. Black lost his job. It was more of a layoff
12 situation. His position was grant funded, and that
13 funding ended, and the county did not pick up the
14 position. So when the funding stream ended, he lost
15 his job.

16 Q. Okay. Do you know if he was, with respect
17 to Gerald, a problem employee?

18 A. I know there was quite a bit of tension
19 between him and Mr. Bostock.

20 Q. Do you know much about that?

21 A. I know in general terms it was -- I think
22 Shawn had accused Mr. Bostock of showing favoritism
23 toward other employees, of sort of minding Shawn's
24 personal life, kind of getting into some of that. I
25 recall that.

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1 Q. Did you ever dig down far enough to know
2 whether there was any merit to those criticisms?

3 A. I didn't personally. I know Mr. Johnson was
4 involved in a meeting -- I actually was present in the
5 meeting as well, but there was a meeting with all of
6 the employees of the unit and Mr. Bostock, and
7 Mr. Johnson basically went around the room and let each
8 person sort of say their piece.

9 Q. And Mr. Black said his piece?

10 A. Yeah, I believe he was there, yes, sir.

11 Q. This meeting and these criticisms never
12 resulted in Gerald being written up or disciplined?

13 A. No.

14 Q. Okay.

15 A. There was a -- I wouldn't call it
16 discipline. There was, if you want to call it
17 anything, probably a coaching.

18 Q. Okay.

19 A. A memo that was produced sort of documenting
20 that meeting and providing Mr. Bostock with some
21 instructions and -- around different ways to handle
22 things in the future.

23 Q. But you all had a progressive discipline
24 policy that if you had felt that this was something
25 that rose to the level of discipline you could have

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1 used; correct?

2 A. Yes.

3 Q. And that includes everything from verbal
4 warning to written warning to suspension and, of
5 course, termination.

6 A. Right. Those are the general steps in it.

7 Q. I've got a note that says that our
8 videographer is about to run out of disc, so we're
9 going to take a little break here.

10 A. Okay.

11 Q. If you need to stretch, use the facilities,
12 whatever, take your time. Be sure you take your
13 microphone off when you do.

14 A. All right. Thank you.

15 MR. BUCKLEY: Okay. Thank you. We're off
16 the record.

17 (VIDEO CAMERA OFF.)

18 (A brief recess was taken.)

19 (VIDEO CAMERA ON.)

20 THE VIDEOGRAPHER: We're back on the record.

21 (An off-the-record discussion was held.)

22 (Exhibit Number [P-3](#) was presented.)

23 BY MR. BUCKLEY:

24 Q. So I want to show you what's marked as
25 Plaintiff's Exhibit 3 and ask you if you can identify

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1 this document. It's Bates stamped Clayton 232 through
2 239. Is this the memorandum of understanding between
3 the Superior Court of the State of Georgia for the
4 County of Clayton and Clayton County CASA that you and
5 I were discussing during the first couple of hours of
6 this deposition?

7 A. It is.

8 Q. Okay. And I'd like to ask you to look at
9 page 2 of this document. Section II there says
10 Administrative Fee, and it says, "Clayton County CASA
11 will charge a flat \$500 administrative fee. All monies
12 must be received by CASA prior to commencement of
13 investigation by CASA. If the \$500 administrative is
14 not paid, the CASA investigation will not commence
15 until the administrative fee is received."

16 And then it says, "Order for payment of
17 costs of guardian ad litem services will be sent to the
18 respective parties by the Clayton County Superior Court
19 and shall include the following statement," quote,
20 "Cash and money order are acceptable means of payment.
21 No personal checks will be accepted. However, a check
22 drawn on the respective attorney's firm will be
23 accepted for payment. All fees shall be paid to
24 Friends of Clayton County CASA, Inc., care of Gerald
25 Bostock, Program Coordinator of CASA, Clayton County

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1 Juvenile Court, 121 South McDonough Street, Courthouse
2 Annex 3, Jonesboro, Georgia, 30236."

3 I have read that correctly, haven't I?

4 A. Yes, sir.

5 Q. And then the next sentence after that says,
6 "The Clayton County CASA Advisory Board is the
7 recipient of the administrative fee and will use the
8 fees to fund volunteer recruitment, training, and
9 retention." Right?

10 A. Correct.

11 Q. Okay. So that -- and that's really all it
12 says about -- in this document about the use of those
13 fees; right?

14 A. I believe so, yes, sir.

15 Q. Okay.

16 A. Yes.

17 Q. Okay. And this document was signed by a
18 number of individuals. It was signed on November 20th,
19 2007, by Matthew Simmons, who was the chief judge of
20 the superior court, Clayton Judicial Circuit, at that
21 time; right?

22 A. Correct.

23 Q. That's his signature there. And then also
24 by K. Van Banke, chief judge of the juvenile court at
25 the time; right?

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1 A. Correct, Judge Banke.

2 Q. Banke. Sorry. And then Gerald Bostock, who
3 was CASA program coordinator for the Juvenile Court of
4 Clayton County; right?

5 A. Correct.

6 Q. Okay. Do you know who drafted this
7 document?

8 A. I don't know.

9 Q. Okay. Would you agree with me that the
10 one-sentence directive on the use of the fees is pretty
11 broad in terms of -- I mean, it says it'll be used for
12 volunteer recruitment, training, and retention. But it
13 doesn't itemize the specific areas, you know, what's
14 appropriate or what's not appropriate in terms of, for
15 example, purchases of alcohol or sponsoring of teams or
16 things like that. It's not that specific; right?

17 A. No, sir.

18 Q. Okay. Do you know whether Mr. Bostock's
19 recruiting events in Atlanta ever resulted in
20 volunteers for the Clayton County CASA Guardian Ad
21 Litem program?

22 A. The only volunteers that I know of were I
23 believe two or three that he mentioned when he
24 responded to the questionnaire that was given to him.

25 Q. Okay.

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1 A. Those are the only ones I know of.

2 Q. Okay. Do you know whether there was a gay
3 softball team? You're aware of the Honey Badgers, that
4 funds were used to put the logo or the name of Friends
5 of Clayton County CASA on the T-shirt, the jersey for
6 the team. Do you know whether any of the team players
7 were recruited to serve as volunteers or guardian ad
8 litem for the court, for CASA, Clayton County CASA?

9 A. I believe Mr. Bostock in his statement
10 stated that those two or three volunteers that I
11 referred to earlier --

12 Q. Okay.

13 A. -- came from that softball league.

14 Q. Okay.

15 A. I don't know that any of them served as
16 guardian ad litem. I'm not sure about --

17 Q. And I don't either.

18 A. -- what their capacity of volunteer --

19 Q. I'm just -- but they were volunteers for the
20 program. What sort of roles did volunteers for the
21 Clayton County CASA program serve? I guess guardian ad
22 litem is one, but what other roles could a volunteer
23 serve in that program?

24 A. So the primary purpose of recruitment of
25 volunteers was to be screened and trained and serve as

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1 guardian ad litem.

2 Q. Okay.

3 A. That was the primary focus of, you know, the
4 volunteer recruitment, training, and retention.

5 Q. Okay.

6 A. But there were other individuals that, you
7 know, were recruited to help with the Friends'
8 fundraising events and whatnot. I wouldn't call
9 those -- they weren't volunteers, obviously, for the
10 GAL. That was more volunteer to assist with the
11 fundraising efforts of -- or marketing or something
12 like that for the Friends of Clayton County CASA.

13 Q. All right. So -- and I don't know whether
14 you were deep into the whole recruitment effort or the
15 training effort, but let's talk about recruitment. Did
16 you ever -- were you ever aware of recruiting events,
17 whether they were in Clayton County or elsewhere, that
18 were perhaps not successful in recruiting a volunteer?

19 A. I didn't do a lot of participation in the
20 recruitment events.

21 Q. Right.

22 A. I mean, I'm sure there were probably some
23 events where -- that weren't fruitful in terms of
24 getting --

25 Q. Right.

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1 A. -- volunteers, but I don't know of --

2 Q. Right.

3 A. -- personally anything.

4 Q. Sometimes you can get people to dig into
5 their pockets, and sometimes you can't; right?

6 A. Right.

7 Q. Okay. So -- and you're not critical -- in
8 terms of Gerald's efforts to recruit, you're not
9 necessarily critical of those efforts because of the
10 results. You're just critical of the way he was
11 recruiting; right?

12 A. I'm not sure I'm critical of the recruiting
13 at all. It was the methodology.

14 Q. Well, that's what I mean, the way.

15 A. Okay. The methodology that was used --

16 Q. Okay.

17 A. -- or the approaches that were used.

18 Q. But in terms of methodology, nothing in this
19 MOU dictates the methodology he should use.

20 A. No.

21 Q. Right. Okay. So I want to talk a little
22 bit more about Mr. Black. You and Gerald, separate and
23 apart from the meeting that you referenced, you and
24 Gerald talked some about Mr. Black and his
25 performance-related problems, didn't you? You had

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1 several conversations about that.

2 A. Right, about the overarching issues. There
3 may have been some conversations, you know, more
4 specific about individuals.

5 Q. And some of the -- some of Mr. Bostock's
6 concerns, as he expressed them to you, were that
7 Mr. Black was sometimes dishonest with him; correct?

8 A. I do recall that --

9 Q. Okay.

10 A. -- being a comment.

11 Q. Sometimes, in terms of the documentation
12 that he submitted, Gerald was concerned that Mr. Black
13 was being dishonest. And he told you that, didn't he?

14 A. I believe so.

15 Q. Okay. And he told you that he had written
16 Mr. Black up; right?

17 A. I recall there was an incident where he
18 disciplined an employee. I don't remember if it were
19 Mr. Black or someone else --

20 Q. Okay.

21 A. -- that caused some concern for Mr. Johnson.
22 Basically, Mr. Bostock didn't follow the policy that
23 was in place that you get to a certain level of
24 discipline, you're supposed to consult the court
25 administrator prior to presenting it to the employee.

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1 I recall that.

2 Q. What level?

3 A. What level of --

4 Q. Of discipline.

5 A. If you're getting to the point where you're
6 doing what would be considered a formal write-up, what
7 the county refers to as a general counseling form.

8 Q. Okay. Did he ever -- would he have to talk
9 to the court administrator, or would he just have to
10 talk to you as his supervisor to get authority to write
11 Mr. Black up?

12 A. I believe at that time the court
13 administrator, Mr. Johnson, would have to sign off on
14 that form prior to it being presented to the employee.
15 So his chain of command, it would have come through
16 me --

17 Q. Right.

18 A. -- to, you know, in other words, make me
19 aware of it, and then Mr. Johnson would sign it.

20 Q. Do you recall whether he ever asked you for
21 authority to write Mr. Black up?

22 A. I don't recall.

23 Q. Okay. And when you say you don't recall,
24 you're saying you just don't remember; right?

25 A. I don't remember, right.

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1 Q. You're not going to say he did; you're not
2 going to say he didn't because --

3 A. I don't remember.

4 Q. -- you don't remember.

5 A. Right.

6 Q. Okay. That was a little while ago; right?

7 A. Yes.

8 Q. There may be a few other things you don't
9 necessarily remember because this has been -- this is
10 2012, 2013 we're talking about; right?

11 A. Correct.

12 Q. Okay. Did Mr. -- did you ever talk to
13 Mr. Black after he was terminated?

14 A. I didn't, other than that email that was
15 sent.

16 Q. Okay.

17 A. I don't recall ever talking to Mr. Black.

18 Q. Okay. Well, when you say "other than the
19 email," when you're saying -- when I'm saying talk, I
20 mean talk.

21 A. Interact personally, no.

22 Q. All right.

23 A. I don't recall doing that.

24 Q. Let me show you that email, the one I think
25 we're talking about. This is Plaintiff's Exhibit 19.

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1 (Exhibit Number [P-19](#) was presented.)

2 BY MR. BUCKLEY:

3 Q. Is this the email that you were referring
4 to?

5 A. It is.

6 Q. Okay. So this is an email dated
7 January 17th, 2013, and it's addressed to Janice Wilson
8 and you. Who is Janice Wilson?

9 A. That was Mr. Johnson's office administrator,
10 assistant.

11 Q. Okay. She didn't really have supervisory
12 authority over him; right?

13 A. No.

14 Q. But it's also addressed to you, and you
15 received this; right?

16 A. Actually, it's addressed to Mr. Johnson.

17 Q. Excuse me. It is addressed to Mr. Johnson.
18 You're right. And then Mr. Johnson forwarded it to you
19 and Ms. Wilson; right?

20 A. He either forwarded it or, you know, printed
21 out a copy and gave it to me. I don't remember.

22 Q. Okay. Well, I'm looking. "Forwarded by
23 John Johnson," do you see that?

24 A. Right. But it doesn't say it was forwarded
25 to me, I don't believe.

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1 Q. Well, it does, because then it shows --
2 let's see -- "forwarded by John Johnson" --

3 A. Oh, okay. Yeah, I see now where you're
4 talking about.

5 Q. Okay.

6 A. Yes.

7 Q. Right. Okay. So Black wrote Johnson.
8 Johnson forwarded it to you and Janice Wilson. And did
9 you reply to this in any way?

10 A. Not that I recall.

11 Q. Okay. And you knew that -- or did you know
12 at this point in time that Johnson's -- I'm sorry --
13 that Black's position had been defunded?

14 A. Yes. This was maybe a month or so after --

15 Q. Okay.

16 A. -- the grant ended.

17 Q. Did you have conversations with Gerald
18 Bostock about Black in which Bostock was talking to you
19 about the need to discipline Black or terminate him?

20 A. I believe there was a conversation to that
21 effect, yeah.

22 Q. And then the position was defunded, and so
23 no need to formally fire him because his job just went
24 away --

25 A. Right.

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1 Q. -- due to lack of funding; right? So, in a
2 way, that was the solution to a problem that had been
3 ongoing; correct?

4 A. I mean, you could look at it that way. But
5 what I would have to say is Mr. Bostock had negative
6 interactions with several of his employees, which, you
7 know, that was noted in the performance evaluations we
8 referenced earlier. There were several employees that
9 Mr. Bostock wanted to get rid of, and my position was
10 to step back a minute. You know, in my position, I
11 look at common denominators, and the common denominator
12 there was Mr. Bostock. So then I have to take a very
13 careful look at what's going on before we take action.

14 Q. Well, we're going to look at his performance
15 reviews in a minute. It's fair to say, in any event,
16 he had several conversations with you specifically
17 about Black?

18 A. I don't know about several. I mean, we had
19 some conversation, I'm sure.

20 Q. Okay. Well, several is more than one?

21 A. Yeah, maybe.

22 Q. You had more than one; right?

23 A. Right.

24 Q. Okay. And in those conversations, Bostock
25 was expressing concern about Mr. Black's performance

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1 and specifically his honesty or lack thereof; correct?

2 A. I honestly don't recall the content of --
3 nor the granular detail of the conversation.

4 Q. Okay. And do you know if, regardless of
5 whether it was written discipline, Mr. Bostock was
6 talking to Mr. Black about his concerns about Black's
7 not showing up for certain events that he was required
8 to show up to or his dishonesty on some of the forms
9 that he submitted to the court, or other performance
10 issues?

11 A. I have no clue what Mr. Bostock talked to
12 Mr. Black about.

13 Q. So you don't know whether part of
14 Mr. Black's motivation for sending this memo was his
15 ire at Mr. Bostock for having perhaps singled him out
16 due to his performance?

17 A. That would require me to speculate and --

18 Q. Okay.

19 A. -- I don't know. I mean, I'm not going to
20 get into somebody's internal motivation for something.

21 Q. Do you happen to know or recall whether
22 Mr. Black blamed Mr. Bostock for his termination?

23 A. I don't know if he blamed him or not. I
24 don't know.

25 Q. Okay. So, if I understand, this email

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1 resulted in an investigation and the audit occurring?

2 Or were they related or they were not related or is the
3 audit completely just unrelated to this email?

4 A. The audit happened independent of this or --

5 Q. Okay.

6 A. And, I mean, it was relevant to the audit.
7 I felt like, once we received this information, the
8 court administration had some responsibility to look
9 into it, of course.

10 Q. But I just want to be clear because I'm
11 looking at causation.

12 A. Right.

13 Q. This email didn't cause Gerald to be
14 terminated?

15 A. No, not this email.

16 Q. Okay. I want to show you an exhibit or two,
17 and I want to be clear. During what time frame -- you
18 know, you gave me a time line for the different jobs
19 that you held. And you were in your position as chief
20 of staff or director of programs and resource
21 development from 2009 to 2015, those two jobs; right?

22 A. Right. During all of this, it was chief of
23 staff.

24 Q. And then you had oversight over Gerald
25 during -- in that time frame, I've got three

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1 performance reviews that I believe you did. Were those
2 the only periods that you had oversight over Gerald,
3 direct reporting relationship?

4 A. Yes.

5 Q. Okay. Let's take a look at those for a few
6 minutes. Okay?

7 A. All right.

8 Q. I want to show you first what's marked as
9 Exhibit 32.

10 (Exhibit Number [P-32](#) was presented.)

11 BY MR. BUCKLEY:

12 Q. Exhibit 32 is a document Bates stamped
13 Clayton 1790 through 1795, and it appears to be a
14 performance review of Gerald Bostock for the appraisal
15 period of 1/13/09 to 1/12/10. And it says supervisor,
16 Colin Slay. This is a performance review that you
17 prepared, Mr. Slay?

18 A. It is.

19 Q. Okay. And I just want to be clear because I
20 want to focus on the things that matter here. There's
21 several pages of this document. I think if you go back
22 to the page that's Bates stamped 1793, go back to that
23 one. It's further back, sir.

24 A. Oh, 17 -- oh, I see the numbers now.

25 Q. All right. So 1793 through 1795 is

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1 basically Gerald's self-evaluation; is that right?

2 A. That's right.

3 Q. And so the pages before that, those are your
4 evaluation of his performance; correct?

5 A. That is correct.

6 Q. Okay. So let's just look generally at the
7 areas that you rated him on. And it looks like, with
8 the exception of supervisory/management ability, you
9 rated him a solid 5, which was the highest score for
10 every category; is that right?

11 A. Correct.

12 Q. So he had a total score of I guess 49 out of
13 a possible 50?

14 A. That's right.

15 Q. Okay. And then on the supervisory/
16 management ability, the key here, the rating says,
17 item 4, supervisory/management ability was "above
18 average performance, exceeds acceptable standards."
19 That's the way you rated him for the rating period --
20 for the appraisal period of 1/13/09 through 1/12/10;
21 correct?

22 A. That's right.

23 Q. All right. So you were pretty pleased with
24 his performance overall, it appears.

25 A. Yes, in that time period, absolutely.

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1 Q. And even though you rated him down a notch
2 on supervisory/management abilities, you still rated
3 him as exceeding acceptable standards.

4 A. Right.

5 Q. Okay. And I'm looking at page 3 of this
6 document, which is Bates stamped 1792. You state, with
7 respect to supervisory/management ability, "Mr. Bostock
8 acts as a leader both in his division and within the
9 court as a whole. He has effectively implemented new
10 procedures for his division during the rating period
11 and has promoted a more productive work environment
12 with higher employee morale."

13 Those are your words; correct?

14 A. Correct.

15 Q. Okay. And was this the first time that you
16 were able to do a performance review of Gerald?

17 A. I believe so.

18 Q. Okay. Let's look at Exhibit 33.

19 (Exhibit Number [P-33](#) was presented.)

20 BY MR. BUCKLEY:

21 Q. And just by the way, Mr. Slay, before I
22 forget, on Exhibit 32, second page of that document,
23 that is your signature where it says supervisor's
24 signature; right?

25 A. It is.

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1 Q. And beneath that is John Johnson's signature
2 as well; is that right?

3 A. Yes, sir.

4 Q. Did Johnson actually participate in the
5 review, or was he simply approving the review?

6 A. Approving the review.

7 Q. Okay. So Johnson didn't disagree with
8 anything you said in this document.

9 A. I would assume that's why he had signed it,
10 yes, sir.

11 Q. Has he ever disagreed with any of your
12 performance reviews, to your recollection?

13 A. There's been a time where we've had
14 conversations about a particular element of a review
15 for an employee or two.

16 Q. Okay. Has he ever pushed back on a rating
17 that you gave an employee in a particular area?

18 A. I think once or twice.

19 Q. Okay. Have you changed your review because
20 Mr. Johnson pushed back in that way?

21 A. No, sir.

22 Q. Okay. He's --

23 A. Not that I recall.

24 Q. -- pushed back, but you've stuck by your
25 guns, it sounds like.

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1 A. Yes, sir.

2 Q. Okay. And, in point of fact, you're the
3 person who had more day-to-day opportunity to observe
4 employee performance of the people who reported to you;
5 correct?

6 A. Yes, sir.

7 Q. Okay. All right. So let's look at
8 Exhibit 33. And this is a document captioned
9 Performance Evaluation Report, Gerald Bostock. And it
10 says -- I'm looking -- by the way, it's Bates stamped
11 Clayton 1782 through 1788. And it is -- it says --
12 it's a little bit different form, but it says, "FYE
13 6/30/2011." Do you see that?

14 A. Yes, sir.

15 Q. And so I just want to be clear. So that is
16 the fiscal year from about June of 2010 to June of
17 2011?

18 A. Yeah, fiscal -- July to June.

19 Q. July --

20 A. -- of 2011.

21 Q. July 1 --

22 A. Yeah.

23 Q. -- 2010 to --

24 A. June 30th.

25 Q. -- June 30th of 2011?

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1 A. Right.

2 Q. Okay. And so you did this evaluation as
3 well, and that's your signature on the first page;
4 right?

5 A. It is.

6 Q. And you rated Gerald a 40 -- total score of
7 46 out of a possible 50; right?

8 A. That's right.

9 Q. With 5s in the majority of categories, 4s in
10 decision making and problem solving and interpersonal
11 relations as well; right?

12 A. That's right.

13 Q. And then down in supervisory/management
14 ability, you rated him a 3, which was "average
15 performance, meets acceptable standards." Correct?

16 A. That's right.

17 Q. And looking at the second page of this
18 document, with respect to supervisory/management
19 ability, you actually didn't have any comment -- oh,
20 wait. No, you did. "Mr. Bostock has experienced some
21 significant leadership challenges among his staff this
22 year; but to his credit, he has accepted the coaching
23 and intervention imposed by the administration with
24 poise and grace and has demonstrated a willingness to
25 work on the issues."

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1 That's your -- those are your words; right?

2 A. Yes.

3 Q. Okay. And with respect to rule conformance
4 you said, "Mr. Bostock knows and follows departmental
5 rules and procedures, and he rarely has to be reminded
6 of them. His attendance was good during the rating
7 period."

8 Now, did you -- did Mr. Bostock at some
9 point start sending you the financial information that
10 he was providing to the Friends of Clayton County CASA
11 board?

12 A. He was instructed by Mr. Johnson, I believe,
13 originally to start providing copies of the bank
14 statements.

15 Q. When was that instruction?

16 A. I want to say early 2012.

17 Q. Okay.

18 A. Or maybe late 2011, somewhere in there.

19 Q. And you received those, and you reviewed
20 them when you received them; right?

21 A. I received them most of the time. There
22 were some times where it either wasn't -- it was
23 forgotten or it wasn't given.

24 Q. Okay.

25 A. But, yeah, I did look through them and pass

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1 along to Mr. Johnson.

2 Q. Did you ever write him up or anything for
3 not submitting --

4 A. Didn't write him up. I believe there was a
5 couple of times where I had to email him to get the
6 report.

7 Q. Okay. All right. Let me show you what's
8 marked as Plaintiff's Exhibit 34.

9 (Exhibit Number [P-34](#) was presented.)

10 BY MR. BUCKLEY:

11 Q. Now, this is a memorandum, captioned a
12 memorandum, dated April 29th, 2013; right?

13 A. That's right.

14 Q. And it's -- it says subject is a four-month
15 performance review. So it's a four-month performance
16 review for calendar year 2013?

17 A. For the fiscal year, yes, sir. This was
18 a -- I would call it an informal review.

19 Q. Okay.

20 A. Sort of a midyear --

21 Q. Okay.

22 A. -- type of meeting.

23 Q. Okay. It's a largely positive review;
24 correct?

25 A. Yes, sir.

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1 Q. Okay. And in terms of -- it looks like you
2 used the same rating system, right, 5s, 4s --

3 A. Right. And there's the official performance
4 evaluation.

5 Q. 5 being an outstanding performance, 4 being
6 above-average performance. And indeed -- let's see --
7 you rated him a 5 or a 4 in every category except on
8 productivity. Quantity of work, you rated him a 3,
9 average, and said, "The rating in this element was
10 lowered due to the missed meetings and late reports
11 previously discussed. As a whole, you do a good job
12 keeping up with the various requirements and deadlines
13 involved with your unit."

14 When you say "late reports," is that what
15 you're taking about, there were some missed --

16 A. I don't recall the details of it. It could
17 be. I don't know.

18 Q. Do you know if they were perhaps reports of
19 juvenile court proceedings?

20 A. I don't recall.

21 Q. Okay.

22 A. I know, besides the bank statements, there
23 were certain other reports that were due --

24 Q. Okay.

25 A. -- about performance --

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1 Q. Okay. Overall though you'd --

2 A. -- measures and things.

3 Q. -- say this is a good review; right?

4 A. Yeah.

5 Q. It's a 45 out of a possible 50? That's the
6 way I do it. That's my math coming from an English
7 major's quick and dirty calculation. That sound
8 correct?

9 A. Yes, sir, I believe that's right.

10 Q. And you actually gave him this review after
11 you received that email from Mr. Black; right?

12 A. Right.

13 Q. Okay. So the Black email, at least at that
14 point in time, really didn't faze you in terms of
15 Gerald's overall performance, did it?

16 A. It was an accusation. It hadn't been
17 investigated, so I'm not going to hold him to account
18 for something that hasn't been investigated.

19 Q. An accusation by somebody who'd just lost
20 his job; right?

21 A. Yeah.

22 Q. And you are a discerning man. You weighed
23 that fact, that the fellow had just lost a job and
24 wasn't happy and felt the need to lash out a little bit
25 at his manager; right?

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1 A. Well, I would say I certainly try to
2 consider, you know, motives in a situation like that.

3 Q. Okay.

4 A. You know, what they might be, I certainly --
5 you can never really know --

6 Q. Okay.

7 A. -- without other evidence.

8 Q. All right. So his -- I just want to be
9 clear. Black's email did not prompt the audit; right?

10 A. It did not prompt the audit. The audits
11 were scheduled independent of the courts. So, if I
12 remember correctly, the audit that year was new in the
13 way that they were doing them.

14 Q. Okay.

15 A. And we were notified by the internal audit
16 department that they would be conducting audits of all
17 the juvenile court accounts.

18 Q. And with respect to that, Friends of Clayton
19 County CASA accounts which were held by a separate
20 nonprofit were not per se juvenile court accounts, were
21 they?

22 A. No.

23 Q. Okay. So I want to walk through with you in
24 Exhibit -- this is Exhibit 20. Before I do, I have a
25 couple of other questions, so -- couple more things

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1 about Black, Mr. Black. He was basically -- his job
2 was funded by a grant, right, a two-year grant?

3 A. I don't remember if it was two years, but it
4 was grant funded. I don't recall --

5 Q. Okay.

6 A. -- exactly the time.

7 Q. And grants, if they're not renewed, they
8 expire; right?

9 A. Correct.

10 Q. Okay. And your recollection is the grant
11 that funded that position held by Black expired; right?

12 A. That's right. And that same grant funded
13 other positions who -- you know, those folks also --

14 Q. Okay.

15 A. -- lost -- some of them lost their job.

16 Q. And at the time that Black's funding
17 expired, I guess the county had an option of maybe
18 separately picking up funding for his position?

19 A. That has happened in the past. It didn't
20 happen with that particular -- that was all -- the
21 county was still dealing with the fallout from the
22 financial crisis in 2008.

23 Q. Okay.

24 A. So --

25 Q. Didn't have the money?

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1 A. Right.

2 Q. Okay. So Black's position basically timed
3 out, and the county elected, either by necessity or by
4 choice, to not separately fund that position --

5 A. Pick that up, no, sir.

6 Q. -- so that Black would have an ongoing job?

7 A. Correct.

8 Q. Okay. So I want to ask you a couple of more
9 questions about the GAL funds. We'll ask other
10 questions, but I want to get this right. Gerald
11 provided monthly reports with copies of bank statements
12 regarding the GAL funds; is that right?

13 A. He provided copies of bank statements, and I
14 recall on several of them he would write sort of an
15 explanation for what that --

16 Q. Right.

17 A. -- particular expenditure was.

18 Q. Here's an expenditure, here's what it was
19 for.

20 A. Right.

21 Q. And he would write that out; and you, as his
22 supervisor, received that. Did anybody else receive it
23 besides you?

24 A. Mr. Johnson.

25 Q. Okay.

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1 A. Well, I forwarded them to Mr. Johnson.

2 Q. You forwarded. Okay. Complete with his
3 hand notations --

4 A. Right.

5 Q. -- and whatnot. And generally did you find
6 Gerald's explanations for the expenditure of these
7 funds satisfactory?

8 A. I would say yeah. I didn't -- nothing flew
9 off the page as inappropriate.

10 Q. Okay. Right.

11 A. But I would say too there were often line
12 items that would have no explanation.

13 Q. Okay. Did you ever ask him for an
14 explanation on anything after you got a report, say,
15 "Hey, I'd like to know what this expenditure was for"?

16 A. I don't recall doing so. I know Mr. Johnson
17 did --

18 Q. Okay.

19 A. -- a few times maybe.

20 Q. Okay. Do you know if Mr. Johnson got
21 satisfactory explanations?

22 A. I don't know.

23 Q. Okay. But you had the option of doing that
24 if you wanted to; right?

25 A. Sure, if I saw something that stood out to

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1 me, yeah.

2 Q. Okay.

3 A. I have to say, though, those things were
4 almost pass through. I didn't know what I was looking
5 for or really --

6 Q. Okay.

7 A. -- have a whole lot of understanding of how
8 that all functioned. I was --

9 Q. But you didn't at the time have any feeling
10 that Gerald wasn't being transparent about what he was
11 doing with the money.

12 A. I didn't know.

13 Q. Okay. And I guess if he wasn't being
14 transparent, he would have not submitted the reports;
15 right?

16 A. That's fair.

17 Q. All right. So, anyway, so --

18 A. But there were times he didn't submit them,
19 so --

20 Q. Okay.

21 A. -- just for the record.

22 Q. But then did you ask him to submit them
23 and --

24 A. I asked, and sometimes we got them. There
25 -- when you go back through the records, there are

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1 months that are missing.

2 Q. Okay.

3 A. Complete months.

4 Q. I looked through the performance review
5 pretty carefully. I didn't see anything about where
6 you expressed any concern about any of that in the
7 review.

8 A. Well, that could have been alluded to with
9 the missing reports. I don't recall that.

10 Q. Okay.

11 A. Being specific. But that was noted in that
12 performance evaluation.

13 Q. Did you ever conclude, once you -- once the
14 audit occurred, did you ever conclude that the devil
15 was in the detail of the missing reports, that, gee,
16 whiz, that was where he was engaging in some misconduct
17 or anything of that nature?

18 A. After the audit?

19 Q. Yes, sir.

20 A. So after the audit, that did stand out to me
21 as a potential red flag after, you know, being made
22 aware of some of the other concerns.

23 Q. Okay.

24 A. You know, I think that would obviously stand
25 out to most people.

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1 Q. As a potential red flag, but what I'm asking
2 you is did you ever specifically learn that any of the
3 reports that were not submitted to you contained
4 evidence of any financial wrongdoing or anything of
5 that nature?

6 A. We never got them, so there's no way to
7 conclude that.

8 Q. Okay. Didn't you all seek to get those
9 reports from Clayton County CASA where he was also
10 providing -- Friends of Clayton County CASA when he was
11 also -- where he was also providing those reports?

12 A. I believe so, but I don't --

13 Q. Okay.

14 A. I wasn't involved in that.

15 Q. Okay. The notations that he made on the
16 bank statements about the nature of expenditures, that
17 was at your request, wasn't it?

18 A. I believe Mr. Johnson's request.

19 Q. Okay. Was that a request through you?

20 A. Possibly.

21 Q. If Gerald remembered that you were the
22 person requesting it, you wouldn't really argue with
23 that, would you?

24 A. Not necessarily. I mean, it came from --

25 Q. Okay.

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1 A. -- his chain of command, whether it was
2 originated with Mr. Johnson or it was a pass through
3 from me. I don't recall that exactly.

4 Q. Prior to the audit, do you remember either
5 you or Mr. Johnson raising any concerns about any of
6 the financial reports that were submitted to you?

7 A. I know Mr. Johnson had concerns.

8 Q. Okay. When you say "had concerns," tell me
9 what you mean.

10 A. Mr. Johnson never shared with me any detail,
11 but it was obvious from my own observations that he --
12 there was some discomfort or suspicion about this going
13 back as far as I want to say November of 2010. But the
14 details of that were never shared with me, so I wasn't
15 aware of what Mr. Johnson's concerns were. I just know
16 that --

17 Q. Okay.

18 A. -- by his own actions and some of the
19 directives he gave me, there must have been something
20 he was concerned with.

21 Q. Did he ever express to you a distaste or
22 dislike for Gerald?

23 A. Not per se. I think he -- he clearly
24 expressed some frustration during those times when
25 Gerald was having the issues with his employees and,

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1 you know, expressed some frustration and, you know,
2 disappointment about the way some of that stuff had
3 been handled.

4 Q. Did Mr. Johnson ever make any comments to
5 you about Gerald's sexual orientation?

6 A. The only thing he made was after all of this
7 happened.

8 Q. What did he say?

9 A. I'm sorry?

10 Q. What did he say?

11 A. Oh, he mentioned, when we were going through
12 the discovery process, that there -- somewhere there
13 was -- I don't remember if it was documents or if it
14 was like -- something to do with computer and
15 photographs being on a computer that had pornography on
16 them.

17 Q. Okay.

18 A. But that occurred whenever the discovery --
19 I don't remember when the discovery -- about a year or
20 so ago maybe when all of the --

21 Q. When you say that occurred a year or so ago,
22 the issue came up a year or so ago, but the actual
23 issue was much, much further back in time in
24 Gerald's --

25 A. I believe --

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1 Q. -- employment?

2 A. Yeah, I believe all of that occurred --

3 Q. Okay.

4 A. -- very early on.

5 Q. And what did he say about that?

6 A. That he should have been terminated for
7 having that stuff on his work computer at that time.

8 Q. Okay. All right. Does your wife work in
9 the probation department?

10 A. Not anymore. She retired this summer. She
11 actually worked in the intake unit.

12 Q. Okay. And, again, what is your wife's first
13 name?

14 A. Catherine.

15 Q. Catherine with a C.

16 A. C, yeah.

17 Q. Did Judge Teske at some point issue an order
18 barring Catherine from his courtroom because of some
19 dispute he was having with another judge with whom she
20 had a good working relationship or to whom she
21 reported?

22 A. With Cathy?

23 Q. Yep.

24 A. No.

25 Q. Was she ever barred from his courtroom?

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1 A. She was never barred from any courtroom. If
2 you're barred from a courtroom, it's going to be hard
3 for you to work at the juvenile court.

4 Q. I would think so, but I'm just --

5 A. No, that never happened.

6 Q. Okay. So I want to show you what's marked
7 as Plaintiff's Exhibit 20.

8 (Exhibit Number [P-20](#) was presented.)

9 BY MR. BUCKLEY:

10 Q. This is a memorandum dated June 7th, 2013,
11 and it's Bates stamped Clayton 312 through 314. It
12 appears to be signed by you, Mr. Slay. Is that your
13 signature on the third page?

14 A. It is.

15 Q. And your signature is dated 6/7/2013; right?

16 A. That's correct.

17 Q. Okay. So this is after Mr. Bostock was
18 terminated?

19 A. That's right.

20 Q. Okay. Why after Gerald was terminated did
21 you feel the need to write this memorandum?

22 A. So shortly after Mr. Bostock's termination,
23 Judge Teske and I -- and I don't remember if John was
24 there, but we actually went to meet with DA Tracy
25 Lawson and her chief investigator.

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1 Q. Okay.

2 A. And, actually, to answer your question, so I
3 was directed by the investigator to make a statement of
4 my involvement with everything.

5 Q. When you say your investigator, you're
6 talking about Mr. Crenshaw?

7 A. It was actually Paul -- I don't remember --
8 I can't remember his last name, but he was the chief
9 investigator. The investigation was assigned to
10 Mr. Crenshaw.

11 Q. He was the investigator for the DA's office?

12 A. DA's office, yes.

13 Q. Now, the DA never -- none of the
14 investigation ever resulted in any sort of
15 indictment --

16 A. No, sir.

17 Q. -- or arrest or anything like that?

18 A. No.

19 Q. And the DA, did the DA ever tell you why --
20 did the DA tell you that there was not adequate
21 evidence?

22 A. Basically that there was not enough -- they
23 didn't have enough evidence to present to the grand
24 jury.

25 Q. Okay. Was that Mr. Crenshaw that told you

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1 that?

2 A. I don't believe I ever had a conversation.
3 I believe the conversation occurred between Judge Teske
4 and Tracy Lawson, and Judge Teske I think was the one
5 that told me.

6 Q. Okay. Did he express disappointment about
7 that?

8 A. No.

9 Q. Okay.

10 A. The investigation -- the meeting with the
11 DA's office was more of a checking the box kind of
12 thing.

13 Q. Okay.

14 A. Just making sure there wasn't -- we didn't
15 want to be looked upon as being negligent because we
16 didn't make the DA's office aware of the situation.

17 Q. Okay. Who was -- whose decision was it to
18 refer the matter to the DA's office? Was it yours?

19 A. Judge Teske.

20 Q. Teske. Okay. And he did this, what,
21 shortly after Gerald was terminated?

22 A. Yes, it was in very close succession. I
23 don't recall exactly --

24 Q. Okay.

25 A. -- the dates.

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1 Q. You were present in a meeting with Sabrina
2 Crawford at or about the time of Gerald's termination;
3 right?

4 A. Yes.

5 Q. You and Judge Teske went over to her car
6 dealership; right?

7 A. That's right.

8 Q. Okay. And told her he was going to be
9 fired; right?

10 A. I think what Judge Teske said, that there
11 was probable adverse action.

12 Q. Okay.

13 A. Termination occurring.

14 Q. And he actually --

15 A. Or about to occur.

16 Q. He actually told her that the news media may
17 be contacting her; right?

18 A. I believe so.

19 Q. Okay. Why did, if you know, did Judge Teske
20 choose to make this -- to take this matter to the news
21 media, Gerald's termination?

22 MR. HILL: I object to the form of the
23 question.

24 A. I have no idea about his motive or --

25 / / /

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1 BY MR. BUCKLEY:

2 Q. But did he tell you he was going to take it
3 to the news media, that he was going to contact the
4 news media about this?

5 A. I believe I was informed the news media had
6 contacted him.

7 Q. Okay.

8 A. If I recall correctly.

9 Q. Before or after the termination?

10 A. I believe it was afterward.

11 Q. Richard Belcher?

12 A. I believe so.

13 Q. And you say you were told that. Who told
14 you that?

15 A. I think Judge Teske told me.

16 Q. Okay. Now, you all went to -- in any event,
17 you all informed Ms. Crawford, who at the time was the
18 chair of Friends of CASA, Friends of Clayton County
19 CASA.

20 A. That's right.

21 Q. Right? And she was -- she and her board,
22 they were the people that Mr. Bostock reported to
23 separate and apart from reporting to you in your job.

24 A. That's right.

25 Q. Okay. And he reported to them because he

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1 was working with them and their funds and their
2 volunteers; right?

3 A. That's right.

4 Q. Okay. And, to your knowledge, he did submit
5 regular financial reports to them; correct?

6 A. I don't -- I was never a participant of any
7 of the board meetings, so I don't know how that
8 happened.

9 Q. In that conversation at Ms. Crawford's
10 dealership, did Judge Teske specifically reference
11 Gerald's expenditure of funds at a gay bar?

12 A. I believe he highlighted all of the things
13 that were brought out in the audit. As to the specific
14 language he used, I -- I don't really remember.

15 Q. Well, you don't remember whether he hit his
16 fist on a table and said that he was spending money,
17 CASA funds, at a gay bar?

18 A. I don't recall that. I recall the meeting
19 actually being very cordial and professional.

20 Q. If Ms. Crawford testified that he did, would
21 you disagree with that testimony?

22 A. I don't recall that.

23 Q. Okay.

24 A. That's how I would say it. I don't -- the
25 meeting was in a glass room --

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1 Q. Right.

2 A. -- off the dealership floor.

3 Q. All right.

4 A. And it was -- my recollection of it was that
5 it was very cordial and professional.

6 Q. Well, you just said you don't recall it, and
7 we've talked about you're not recalling a few other
8 things. And I realize time marches on; right?

9 A. Yeah.

10 Q. You're saying you don't recall that. If
11 Ms. Crawford so testified, and I'll represent to you
12 that she has in her deposition in this case, would you
13 dispute that testimony, or is your testimony I just
14 don't remember that?

15 A. My testimony is I don't remember that. I'm
16 not going to sit here and call the lady a liar. I
17 don't recall. That was --

18 Q. All right.

19 A. -- nearly nine years ago.

20 Q. You know Ms. Crawford; right?

21 A. Yeah, I do.

22 Q. You have a good relationship with her.

23 A. Absolutely.

24 Q. She's a person of integrity, isn't she?

25 A. I believe so. In my experience, she has

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1 been.

2 Q. Right. And she's also a person, it sounds
3 to me at least with all of her charitable work, she's a
4 person with a good heart as well.

5 A. I would absolutely say that.

6 Q. Okay. Did she in that -- did Judge Teske in
7 that meeting tell her that Gerald had made the decision
8 to sponsor a gay softball team with Friends of CASA
9 funds?

10 A. He may have said that because, as I said
11 before, he sort of went through the -- I remember him
12 going through the highlights of the audit and the
13 concerns that were raised in the audit, and that was
14 one of those concerns.

15 Q. Okay. And so if she testified that he said
16 that, you wouldn't dispute that either; right?

17 A. I -- again, I mean, I don't recall the
18 details of that meeting, the specifics of it, what was
19 said necessarily. I have a general recollection of it,
20 but it was a brief -- relatively brief meeting and --

21 Q. Did you ever hear of a bar in Midtown
22 Atlanta called Frogs?

23 A. I've seen it in the audit report.

24 Q. Okay. To your knowledge, is that a gay bar?

25 A. I have no clue.

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1 Q. Okay. Let's assume for the sake of
2 discussion that Gerald was engaged in a recruiting
3 event at a gay bar. Would that be an improper use of
4 Friends of Clayton County CASA funds?

5 A. Not in and of itself, no.

6 Q. Okay. And looking back at the MOU, there is
7 no prohibition against that kind of activity in terms
8 of what it says he can do or not do; right?

9 A. No. Right, no.

10 Q. Okay. All right. So let's go back to this
11 memorandum that you wrote dated June 7, 2013. You --
12 I'm not going to -- we're not going to go line by line,
13 but we are going to go over some of the things you say
14 in here. You said in -- I'm looking at the third
15 paragraph. "On October 12, 2011, I received
16 instructions from Mr. Johnson to investigate the
17 receipt of monies by Carol Gossett, a court officer at
18 the time assigned to Child Welfare Services, in
19 relation to the Guardian Ad Litem program, a joint
20 venture of the juvenile court and Clayton County
21 Superior Court. The scope of my instruction was to
22 investigate how the money was collected and the
23 documentation process of those receipts."

24 So Carol Gossett is actually Gerald's
25 replacement in his position; correct?

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1 A. She was appointed to take that position,
2 yes.

3 Q. After he was fired?

4 A. Right.

5 Q. And I want to be clear. She was -- what was
6 her job in the Clayton County Juvenile Court?

7 A. She was the -- I believe her title was CASA
8 volunteer supervisor, but her primary responsibility
9 was to conduct the -- to handle the superior court GAL
10 cases, which involved her sometimes or a volunteer
11 doing home evaluations.

12 Q. Okay.

13 A. That sort of thing.

14 Q. But she's an employee of Clayton County
15 Superior Court; right?

16 A. No, she worked for the juvenile court.

17 Q. I'm sorry. Excuse me.

18 A. Yeah.

19 Q. I said superior.

20 A. Right.

21 Q. Juvenile.

22 A. Juvenile.

23 Q. She was an employee of Clayton County
24 Juvenile Court.

25 A. Correct. And Mr. Bostock was her direct

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1 supervisor.

2 Q. Okay. And when you're talking here about --
3 in your memorandum about "investigate the receipt of
4 monies by Carol Gossett," are you specifically
5 referring to monies that ended up being paid into
6 Clayton -- Friends of Clayton County CASA?

7 A. Correct, the GAL program.

8 Q. Okay. The GAL program.

9 A. Yeah.

10 Q. All right. So -- and I want to be clear
11 because the MOU actually says they're to be made out to
12 Friends of Clayton County CASA, care of Gerald Bostock.
13 That's what the MOU says; right?

14 A. That's right.

15 Q. So would Ms. Gossett receive the check, and
16 then it would be deposited in Friends of Clayton County
17 CASA? Is that how that worked?

18 A. Well, what I found was pretty much anybody
19 in the Child Welfare Services unit would take money as
20 it was delivered, take checks, money orders.

21 Q. Okay.

22 A. Those were then turned over to
23 Mr. Bostock --

24 Q. Right.

25 A. -- who handled the deposit with the Friends.

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1 Q. But those checks or money orders were
2 supposed to be made out to Friends of Clayton County --

3 A. Correct.

4 Q. -- CASA; right?

5 A. Right, right.

6 Q. Okay. And so you said here, third
7 paragraph, "My investigation found that the monies
8 associated with the program were being collected and
9 deposited in accordance with the 2007 memorandum of
10 understanding between the juvenile court and superior
11 court and that there was a process for recording those
12 receipts. Following the investigation, Mr. Johnson
13 requested that Mr. Bostock start providing copies of
14 the bank statements from the GAL account. Mr. Bostock
15 did so, albeit on an inconsistent basis."

16 So your investigation found -- and I just
17 want to be clear. He asked you to investigate the
18 receipt of these monies. Did he at that time suggest
19 that he thought there was any impropriety or anything
20 like that?

21 A. Provided no context or background.

22 Q. Okay.

23 A. I was just given that instruction.

24 Q. So you investigated it, and you found that
25 the procedures sort of generally outlined in the MOU

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1 were being followed and that the funds were being
2 properly deposited.

3 A. There was nothing that I looked at that
4 raised suspicion about how the money was collected,
5 and --

6 Q. Okay.

7 A. -- so I concluded that it's in line with the
8 MOU. You know, money's not --

9 Q. Okay.

10 A. -- is going where it's supposed to go.

11 Q. Did you look at Friends of Clayton County
12 CASA bank records at all during that period of time
13 when you were doing that initial 2011 investigation?

14 A. I don't recall doing that. I think my
15 investigation really was limited to asking questions of
16 Mr. Bostock and Ms. Gossett.

17 Q. Okay.

18 A. And understanding the process of how it was
19 received. I didn't -- I didn't look at expenditures at
20 all or any of that.

21 Q. Okay. So let's go to the next paragraph.
22 You say, "In late January 2013, I became aware of an
23 email a former employee, Shawn Black, sent Mr. Johnson
24 raising concern about how the GAL monies and other
25 funds collected by Friends of Clayton County CASA were

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1 being spent by Gerald Bostock." And you go on to say,
2 "Mr. Black shared that the funds, the primary purpose
3 of which are to support the CASA program with volunteer
4 recruitment, retention, and training, were being spent
5 on meals, alcohol, and other personal expenses by
6 Mr. Bostock." You said, "While the matter was greatly
7 concerning, because the money in question all belongs
8 to FCCC" -- Friends of Clayton County CASA; right?

9 A. Uh-huh (affirmative).

10 Q. -- "a separate nonprofit organization for
11 which we have no authority or oversight, Mr. Johnson
12 and I struggled with how to go about looking into the
13 matter without overstepping our legitimate authority."
14 Correct?

15 A. Correct.

16 Q. And so at that time, at least at the time of
17 the Black email, you concluded these aren't funds we
18 really have authority over, so we can't look into how
19 they're being spent or whether they're being spent
20 appropriately or anything else. Is that the gist of
21 what you all concluded at that point?

22 A. That was the conclusion, but there was the
23 tension of Mr. Bostock being an employee of the county
24 and having direct access and spending authority, debit
25 cards issued in his name.

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1 Q. Right.

2 A. That was the tension. That's the
3 connection --

4 Q. Okay.

5 A. -- between we have an employee who is
6 spending this money and it appears with little or no
7 oversight.

8 Q. Okay.

9 A. We have these accusations that it's being
10 misspent.

11 Q. Okay.

12 A. The tension is how do we go about
13 investigating that. I don't feel like I can walk into
14 Sabrina Crawford's office and demand the bank
15 statements.

16 Q. Right.

17 A. At my level of authority at this point.

18 Q. Okay. And even though you had these
19 allegations from Black, shortly after you had received
20 those allegations, you wrote a very positive
21 performance review of Gerald; correct?

22 A. Well, you can't put something in writing for
23 which you have no evidence.

24 Q. Right. And so --

25 A. At that point they were all just

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1 allegations.

2 Q. Okay. And so -- and then you say, "In late
3 March 2013, we were notified by Internal Audit that
4 they would soon be conducting routine audits of all
5 cash handling, countywide. Seeing this as an
6 opportunity, on the day of our audit, Mr. Johnson asked
7 the auditors to look into the handling of GAL funds
8 since those funds were being collected by county
9 employees in the Child Welfare Services unit."

10 That's a true statement; right?

11 A. Yes, sir.

12 Q. Okay. And it says, "The auditors
13 interviewed Mr. Bostock, and on April 23, 2013,
14 Mr. Johnson was notified by Stacey Merritt, director of
15 Internal Audit, that the GAL funds needed further
16 investigation due to red flags raised during her
17 interview of Mr. Bostock."

18 Let me ask you this question. Once you saw
19 this opportunity, as you say, was this -- was it
20 Johnson who said -- asked the auditors to -- did he
21 tell you to ask the auditors to look into the use of
22 GAL funds or did Johnson?

23 A. He asked.

24 Q. Okay. And did he then ask Clayton County --
25 Friends of Clayton County CASA to provide their

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1 records, their bank records?

2 A. Mr. Johnson?

3 Q. Yeah.

4 A. No. When Stacey Merritt came back and told
5 John --

6 Q. Okay.

7 A. -- there were red flags --

8 Q. Okay.

9 A. -- John and I then went to Judge Teske to
10 brief him on the information.

11 Q. Okay.

12 A. He --

13 Q. Sorry. Go ahead.

14 A. He instructed John to get in touch with
15 Chairman Turner, the chairman of the Clayton County
16 Commission --

17 Q. Okay.

18 A. -- to ask for authority for Internal Audit
19 to look at those bank accounts, which Chairman Turner
20 provided.

21 Q. Do you -- did Ms. Merritt or Mr. Johnson
22 tell you what these red flags were that are referred to
23 here in your memorandum?

24 A. I recall the missing records, the expense on
25 items that Mr. Bostock appeared to personally benefit

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1 from, the lack of oversight or policies and procedures
2 around the governance of how those funds were to be
3 spent, all of those things I recall being mentioned as
4 red flags.

5 Q. Okay. And let me be clear on what -- let's
6 go through each of these things, categories. Expense
7 on items Gerald Bostock benefited from, what are you
8 referring to there? Are you referring to having a meal
9 with somebody or what?

10 A. I believe that was part of it, but I
11 believe -- yeah, that was part of it, meals and drinks
12 with -- that he was benefitting from. But also the
13 sponsorship of the softball team, of which he played --

14 Q. Okay.

15 A. -- that was -- I remember the term conflict
16 of interest --

17 Q. Right.

18 A. -- being floated for that.

19 Q. There's nothing at all in the MOU, which is
20 Exhibit 3 in front of you, that says any -- that has
21 any sort of guidelines for what might constitute a
22 conflict of interest for Gerald Bostock, nothing in
23 there that says --

24 A. No, not in the MOU.

25 Q. Okay.

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1 A. There are --

2 Q. Right.

3 A. -- statements of policy with the county that
4 talk about conflict of interest and ethics, but --

5 Q. And in terms of -- in terms of that, if he
6 was using the Honey Badgers team to recruit, I mean,
7 any time a person -- let me back up. If Gerald were
8 trying to recruit an individual to be a volunteer and
9 he took that individual out for lunch -- well, Gerald
10 would benefit by that lunch because he's getting a meal
11 and sustenance, but he's also engaging in CASA-related
12 activity. Are you saying the mere fact that Gerald
13 consumed something at that lunch means that he
14 benefited by that and, therefore, that that's a
15 conflict of interest?

16 A. Well, I think I would question -- the
17 conflict of interest becomes repeated meals with the
18 same person. My question is why does it take that many
19 meals to recruit a volunteer? We're not a Fortune 500
20 company out swooning clients. We're a government
21 organization looking for volunteers for kids.

22 Q. Right.

23 A. And, again, the alcohol issue with regard to
24 that was concerning.

25 Q. When you say "repeated meals with the same

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1 person," who is that same person you're referring to?

2 A. I don't recall the name, but there were --
3 there was a fellow, I believe he worked as -- for AT&T.
4 Maybe it's Chris Burton. I don't remember for sure the
5 name. I know there were repeated meetings, dinner
6 meetings, you know, that involved alcohol with him.

7 Q. And you do seem -- I understand you don't
8 like the alcohol issue.

9 A. Right.

10 Q. Do you know whether Gerald was obtaining
11 approval for these events from the Friends of Clayton
12 County CASA board?

13 A. I have no idea.

14 Q. Okay. That's beyond the scope of your
15 knowledge.

16 A. Right.

17 Q. Okay. So you say, "Specifically,
18 Ms. Merritt expressed concern about the record keeping
19 and Mr. Bostock's level of authority to use the funds
20 at his discretion."

21 The level of authority to use the funds was
22 basically a function of the MOU and whatever the
23 Clayton County -- Friends of Clayton County CASA board
24 authorized him to do; right?

25 A. Except that the bylaws of the Friends of

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1 Clayton County CASA specifically state that
2 expenditures are to be approved by the chairperson and
3 that expenditures over \$500 are to be signed off on by
4 the chairperson and the treasurer.

5 Q. And Ms. Crawford would be that chairperson
6 for the --

7 A. Correct.

8 Q. -- relevant time period; right?

9 A. Yeah, for I think most of the period, if not
10 all.

11 Q. Didn't she tell y'all in that meeting that
12 y'all had in her dealership that she approved the
13 expenditure of money to sponsor the Honey Badgers
14 baseball team?

15 A. What I recall is that she said something to
16 the effect of he told us about it.

17 Q. Right. Okay.

18 A. Her and another board member, not at a --
19 specifically at like a full board meeting.

20 Q. But if he just needs the chair's approval,
21 then he told her; right?

22 A. I suppose so. I wasn't there. I have no
23 clue if that happened or not, but --

24 Q. Okay. Yeah, but she told you she did.

25 A. That's what she told me, right.

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1 Q. All right. And you don't think she was
2 lying.

3 A. No.

4 Q. All right. So -- but the level of authority
5 that he had was tied to, as I understand it, two
6 things, the MOU and whatever discretion the Friends of
7 Clayton County CASA board gave him; right?

8 A. Correct.

9 Q. Okay.

10 A. As long as what was happening doesn't
11 conflict with county policy or court policy.

12 Q. Right. And you know that they gave him some
13 credit cards to use for recruiting and training events?

14 A. I believe there were debit cards issued in
15 his name under the GAL account and then I think the
16 general account as well.

17 Q. Right. I said credit card, but --

18 A. Yeah, debit card.

19 Q. -- debit card; right? Okay. So we go on.
20 So Johnson talked to Judge Teske, according to your
21 memorandum. And then on May 1, it says, "Judge Teske
22 directed Johnson to request of Chairman Turner that the
23 Internal Audit perform a more thorough audit of the GAL
24 funds," that "Turner agreed and ordered the audit."
25 And you said, "When Mr. Johnson and I notified

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1 Mr. Bostock of the pending audit, he responded by
2 asking what right you had to look into the matter since
3 the money belonged to FCCC and was not the property of
4 the juvenile court." Correct?

5 A. Right.

6 Q. And, actually, that question was one that
7 you had actually asked yourself per the first page of
8 this memorandum; right?

9 MR. HILL: I object to form.

10 BY MR. BUCKLEY:

11 Q. Well, going back to the second to last
12 paragraph of the first page, you said, "While the
13 matter was greatly concerning because the money in
14 question all belongs to FCCC, a separate nonprofit
15 organization for which we have no authority or
16 oversight, Mr. Johnson and I struggled with how to go
17 about looking into the matter without overstepping our
18 legitimate authority."

19 That was -- those were your words; right?

20 A. Those are my words.

21 Q. Yeah. And so Gerald's concern that he
22 expressed to you and I guess Mr. Johnson, you know,
23 what right do you have to look into the matter since
24 the money belongs to FCCC, was not an unreasonable
25 question to ask, was it?

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1 A. To me, it absolutely raised red flags. If
2 you have nothing to hide, you as a county employee know
3 that you have responsibility to the county for your
4 actions. Why not be an open book? And the fact of the
5 matter at this point in the process, we had gone
6 through all the way to the chairman of the Board of
7 Commissioners to get authority. When I said we
8 struggled because we didn't have authority, I was
9 referring to myself and Mr. Johnson. I didn't feel
10 like I had the right to walk into Sabrina's office and
11 ask for, you know, bank statements or demand answers on
12 how things were spent.

13 Q. Okay.

14 A. But since the chairman, Judge Teske all
15 agreed that that was proper and the chairman has the
16 authority to order this as Mr. Bostock is an employee
17 of the county and is involved with this and it's
18 directly related to the work of the county.

19 Q. I get it. But, you know, here's the thing.
20 Mr. Bostock, yeah, he had a fiduciary obligation to the
21 county.

22 A. Yes.

23 Q. But he also had a separate fiduciary
24 obligation to Friends of Clayton County CASA; correct?

25 A. He did, absolutely.

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1 Q. And that obligation involved all kinds of
2 things, including who and when somebody could just look
3 at their private bank records and that kind of thing.
4 So I'm just saying where you question whether -- how
5 and whether you could have the authority yourself,
6 Gerald's a pretty intelligent guy.

7 A. Sure.

8 Q. You agree?

9 A. Absolutely.

10 Q. It's not really surprising that he would
11 say, "Well, what right do you have to look at the books
12 of Friends of Clayton County CASA?" That's not
13 surprising since you yourself, another intelligent man,
14 raised the very question; right?

15 MR. HILL: Object to the form of the
16 question.

17 A. Again, at this point in the process, the
18 matter of authority has been resolved in my mind. And
19 I know in the past when, for instance, Mr. Johnson
20 directed Gerald to provide the bank statement, there
21 was a reaction similar.

22 BY MR. BUCKLEY:

23 Q. Okay.

24 A. But he did that. If we're already getting
25 the bank statements, why are you objecting now to this

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1 audit being done? It just appears on the surface. I'm
2 not -- I wasn't at that point making an accusation, but
3 it raises a red flag in my mind. It raises honestly
4 some suspicion into my mind that you are opposed to
5 having someone look in on it.

6 Q. All right. So let's go to the next
7 paragraph. It says, "On May 23rd, 2013, Mr. Johnson
8 and I met with Ms. Merritt and Leslie Moore of Internal
9 Audit to discuss their findings." And it says, "The
10 report showed numerous inconsistencies in record
11 keeping and shared concerns that Mr. Bostock was
12 spending money on items that personally benefited him
13 and was doing so without any direct oversight by the
14 FCCC board of directors, the holder of the funds."

15 Now, are you talking about the audit report,
16 or are you talking about something else, some other
17 document when you say "the report"?

18 A. The audit report.

19 Q. Okay. We're going to look at that. I don't
20 think it quite says that, but that's what you say here.

21 A. Doesn't quite say which part?

22 Q. That "the report showed numerous
23 inconsistencies in record keeping and shared concerns
24 that Mr. Bostock was spending money on items that
25 personally benefited him and was doing so without any

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1 direct oversight by the FCCC board of directors, the
2 holder of the funds."

3 A. I think the audit report --

4 MR. HILL: You can wait --

5 A. -- directly says that.

6 MR. HILL: -- for him to ask a question
7 first.

8 BY MR. BUCKLEY:

9 Q. So my question for you is this: Did you
10 ever interview any of the FCCC board of directors with
11 respect to their oversight?

12 A. No. I didn't conduct this investigation.

13 Q. Okay. And it says here, your next sentence
14 says, "Money was spent in restaurants and bars to
15 sponsor Mr. Bostock's own softball team and on other
16 questionable purchases." And when you say "his own
17 softball team," you're not saying he owned the team;
18 right?

19 A. The team he was on.

20 Q. The team he was on.

21 A. He was a member of.

22 Q. And this team he was on was not something
23 that he profited by. It was a -- basically a volunteer
24 activity where a bunch of guys got together and played
25 softball; right?

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1 A. Right, but there's expense involved. I've
2 been on teams before. You have to buy uniforms. You
3 have tournament entry fees, those sorts of things. And
4 if you have a sponsorship that is now paying for that,
5 you're directly benefiting from that sponsorship.

6 Q. You have a sponsorship that's paying for the
7 team and is also advertising for Friends of Clayton
8 County CASA; right?

9 A. Right, but therein lies the conflict of
10 interest.

11 Q. Okay. And the conflict of interest would --
12 so the conflict of interest in your mind would occur if
13 he had a meal with somebody and he ate some of the food
14 that was paid for?

15 A. No. I think the repeated meals that happen
16 after -- you know, at this point we had a brand new
17 juvenile court building with all this meeting space.
18 Everybody else that meets with their volunteers -- and
19 we have other units within the court that have
20 volunteer services.

21 Q. Right.

22 A. None of them are taking people out to dinner
23 at night in Atlanta repeatedly. None of them are
24 consuming alcoholic beverages that are being paid for
25 through sponsorship funds. None of them are sponsoring

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1 their own softball teams.

2 Q. But those are county employees. And if they
3 were doing those things, they would be doing them with
4 county funds; right?

5 A. Correct. And Mr. Bostock is held to those
6 same standards. He's a county -- or was a county
7 employee.

8 Q. He's a county employee, but the funds
9 involved had oversight by a private board of directors
10 and did not have oversight by any Clayton County
11 official. And Mr. Bostock, in terms of the handling of
12 those funds, was subject to the supervision of that
13 board; right?

14 A. Correct. But I would say there's no
15 evidence that there was any oversight or very little
16 oversight of the expenditure of those funds, and that
17 is part of the primary issue. There were no policies
18 and procedures in place.

19 Q. Well, when you say there was no oversight,
20 you've already said you didn't interview or talk to any
21 of the board members; right?

22 A. Mr. Bostock had a debit card.

23 Q. Right.

24 A. That he with free will made purchases on.
25 There was no evidence or documentation that any of

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1 those purchases were approved in advance.

2 Q. Do you know if the Friends of Clayton County
3 CASA board gave Gerald the discretion in advance to use
4 that credit card for Friends of Clayton County CASA
5 activities? Do you know if they gave him that
6 discretion?

7 A. I don't know if they gave him that
8 discretion.

9 Q. Okay. And if they did give him that
10 discretion, was he wrong for relying on that authority
11 in making purchases with that card?

12 A. In using funds from the GAL account to
13 purchase alcohol, to sponsor receptions at a softball
14 tournament in Birmingham, Alabama, which I have a hard
15 time believing you're getting any recruits from Alabama
16 for Clayton County CASA. All of that is the issue I
17 had a problem with. If he were doing this with funds
18 strictly from the FCC account, it might be a different
19 conversation.

20 Q. Okay. Going back to the MOU, though, it
21 simply says that the funds, the fees, it says, "will
22 use the fees to fund volunteer recruitment, training,
23 and retention."

24 A. Yeah, CASA volunteers.

25 Q. Okay. Right.

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1 A. Not volunteers for FCC, volunteers for CASA,
2 CASA GALs.

3 Q. All right. So -- all right. Fine. So you
4 mentioned something in Birmingham.

5 A. Uh-huh (affirmative).

6 Q. There was a softball event in Birmingham?

7 A. Yeah. I believe it was a tournament of the
8 league that --

9 Q. Okay.

10 A. -- Mr. Bostock's team was --

11 Q. This was --

12 A. -- a part of.

13 Q. -- the one that -- the Honey Badgers, the
14 team was --

15 A. I think that's the name of it, yes.

16 Q. Okay. And do you know if those funds were
17 spent with respect to any of the volunteers that were
18 on the Honey Badgers team?

19 A. I believe, referencing the tournament in
20 Alabama, those funds were spent to provide a reception,
21 like, you know, I don't know, hors d'oeuvres and drinks
22 or whatever for people that are participating in the
23 softball tournament.

24 Q. Do you know that, or are you just
25 speculating on that?

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1 A. I think that's what Mr. Bostock responded to
2 in his questionnaire, that it was a light reception, if
3 I remember the wording right.

4 Q. Okay. So, in any event, so you in your
5 memorandum -- I mean, I'm just trying to figure out if
6 you're faulting Mr. Bostock for having a debit card
7 issued to him by Friends of Clayton County CASA.

8 A. Mr. Bostock was terminated for incompetence,
9 negligence, and conduct unbecoming a county employee.
10 The fact that he never established policies and
11 procedures, a fact that because there weren't records
12 on a lot of the expenses, there weren't proper
13 accounting of things, that was what concluded the fact
14 that disciplinary action had to be taken.

15 Q. Well, hang on, because you're not the
16 decision maker here. But you sound like you're --

17 A. I was involved in the conversations, so
18 I'm --

19 Q. All right. So --

20 A. -- privy to what --

21 Q. -- let's go back to that.

22 A. -- the conversation was.

23 Q. Are you faulting him for having a debit card
24 issued to him by the board of Friends of Clayton County
25 CASA?

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1 A. Not in and of itself, but by not having
2 proper procedures in place for record --

3 Q. Okay.

4 A. -- keeping and authorization.

5 Q. And when you say he didn't have proper
6 procedures for record keeping and authorization, when
7 the Clayton County -- Friends of Clayton County CASA
8 board chair says, "We want to issue you a debit card,"
9 because he's spending his own money and then seeking
10 reimbursement and she wants to make it easier for these
11 transactions to occur, does he need to have some
12 documentation of the fact that this private charity
13 issued him a debit card for its use?

14 MR. HILL: Object to the form of the
15 question.

16 BY MR. BUCKLEY:

17 Q. Go ahead.

18 A. But I believe the audit also showed that --
19 when I say no record keeping, proper procedures in
20 place, there were expenditures for which there were no
21 receipts produced.

22 Q. Okay.

23 A. There was a reimbursement that was made to
24 Gerald with a check signed by himself. Those are all
25 things that are not standard accounting processes or,

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1 you know, reimbursement techniques. All of that stuff
2 is -- was improper.

3 Q. Well, hang on. When you say improper,
4 that's a strong word. Let's --

5 A. Yeah.

6 Q. Let's look at that. He was subject to the
7 direction, with respect to the expenditure of these
8 funds, of the Friends of Clayton County board and
9 whatever procedures they set up or didn't set up for
10 him; isn't that right?

11 A. Correct. But, again, we're talking about a
12 county employee who you've already said, and I agreed,
13 is a very intelligent person, knows how the county
14 operates when it regards to expend -- when it comes to
15 expenditures, accounting, and all of those things. And
16 the fact that he never took the care to work with the
17 board of FCCC to establish something similar that is in
18 line with accepted accounting practices was the issue.

19 Q. But practically speaking, you don't really
20 have any personal knowledge about what care he took
21 with respect to that board, what conversations he had
22 with that board -- hang on -- with respect to
23 expenditures of money or the recording of those
24 expenditures of money. You don't have any personal
25 knowledge concerning those conversations, do you?

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1 A. I don't. But what I see is the result.

2 Q. Okay.

3 A. And it appears to several people there is no
4 procedure, that there was no authorization, that he had
5 free access and rein to spend the money how he saw fit.

6 Q. And he may have.

7 A. Right.

8 Q. But he was subject to whatever constraints
9 or directions that the Friends of Clayton County CASA
10 board put on him; correct?

11 A. Yes.

12 Q. Or lack thereof; right?

13 A. Correct. But it doesn't abrogate his
14 responsibilities as a county employee.

15 Q. Well, what if he was the treasurer of his
16 softball team?

17 A. That would be fine. That's not direct --
18 the Friends of Clayton County CASA would not exist if
19 there weren't a Clayton County CASA program.

20 Q. Okay.

21 A. Their sole mission is to promote and support
22 that program. It's directly tied to the mission of the
23 juvenile court. His softball team is a personal matter
24 that has nothing to do with work.

25 Q. Okay. And yet there -- well, apparently it

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1 does because that's one of the reasons --

2 A. Well, when he sponsored --

3 Q. -- he got fired.

4 A. When he starts using court money to sponsor
5 his own softball team, yeah, that's an issue.

6 Q. He did not use court money --

7 A. The money was raised through the CASA GAL --
8 I mean, the superior court GAL program.

9 Q. Right.

10 A. Those are not private funds. That money was
11 ordered by a court.

12 Q. They're not court funds either.

13 A. But it was ordered by a court, and that
14 money should be spent in accordance and in the same
15 fashion that any other government money should be
16 spent.

17 Q. And that is your conclusion, and yet --

18 A. It is absolutely.

19 Q. -- and yet there is not a single soul or was
20 not a single soul on the board of Friends of Clayton
21 County CASA who was a court official, and there is a
22 reason why there was an independent board set up so
23 that they could have independent oversight on how these
24 monies were spent. True?

25 A. That's true.

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1 Q. Okay. All right. I think we're about to
2 run out of video right now, so this may be a good time
3 to take a break.

4 A. Okay.

5 Q. A little lunch break. If we go much longer,
6 we'll be at dinner time, so let's do that.

7 MR. BUCKLEY: Go off the record, please.

8 THE VIDEOGRAPHER: We're off the record.

9 (VIDEO CAMERA OFF.)

10 (A luncheon recess was taken.)

11 (VIDEO CAMERA ON.)

12 THE VIDEOGRAPHER: We're back on the record.

13 BY MR. BUCKLEY:

14 Q. All right. We are back on the record,
15 Mr. Slay. And you understand you're still under
16 oath --

17 A. Yes.

18 Q. -- correct? And you've taken a break. Is
19 there any testimony you've given so far that you need
20 to correct or clarify?

21 A. Not -- not that I can think of, no, sir.

22 Q. All right. Okay. If in the course of this
23 deposition you realize there's anything you need to
24 correct, just say so. Okay?

25 A. Okay.

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1 Q. And we'll give you an opportunity to do that
2 or clarify.

3 A. All right.

4 Q. So before we took the break, we were looking
5 at Plaintiff's Exhibit 20, which you still have in
6 front of you; right? And we're on page 2 of that
7 document. And we were looking at, I believe, the
8 second paragraph of that page. And you stated in this
9 memorandum that you and Mr. Johnson shared the report
10 with Judge Teske. "He contacted Matt Sorenson,
11 Superior and State Court Administrator, and asked him
12 to advise Chief Superior Court Judge Deborah Benefield
13 of the audit."

14 Judge Teske, I assume, told you that he did
15 that?

16 A. I believe he did it while we were all
17 still --

18 Q. Okay.

19 A. -- in the meeting together.

20 Q. And then you say, "Judge Teske, Mr. Johnson,
21 and I then went to human resources and met with the
22 auditor, Leslie Moore, and HR director, Renee Bright,
23 to discuss the audit. It was decided in that meeting
24 that Judge Teske would propound a series of questions
25 demanding answers regarding the audit findings from

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1 Mr. Bostock. Mr. Johnson and I delivered those
2 questions to Mr. Bostock on May 28th, 2013."

3 These were written questions; correct?

4 A. They were.

5 Q. Okay. And I want to be clear. You said
6 that you shared the report with Judge Teske. That was
7 the audit report?

8 A. That is what I was referring to.

9 Q. Was it the finalized audit report?

10 A. Yes, sir.

11 Q. Okay. And I want to show you an exhibit.

12 Excuse me. One second here.

13 (Exhibit Number [P-10](#) was presented.)

14 BY MR. BUCKLEY:

15 Q. Let me show you what's marked as Exhibit 10.
16 Is that the -- when you say you showed Judge Teske the
17 audit report, is that the audit report that you showed
18 to Judge Teske?

19 A. Yes, sir.

20 Q. And this is, as I understand it, the final
21 version of the audit report; right?

22 A. That is my understanding, yes.

23 Q. Did you ever see any earlier drafts?

24 A. I don't remember if what we were presented
25 was a draft or if it was the final --

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1 Q. Okay.

2 A. -- report.

3 Q. Well, do you remember if what you gave to
4 Teske was the final?

5 A. It was this report.

6 Q. Okay.

7 A. So I'm thinking it was the final, but --

8 Q. This report, Plaintiff's Exhibit 10?

9 A. Yeah.

10 Q. Okay. We'll get back to that document.

11 Let's go back to 20 for a minute. So it says that you
12 submitted the questions to Mr. Bostock May 28th and
13 received answers back on May 31st. And you said, "At
14 that time, I demanded that Mr. Bostock surrender the
15 FCCC debit cards and checkbooks. He claimed that the
16 checkbooks were delivered to the FCC treasurer earlier
17 that week, and he only produced one debit card drawn on
18 the GAL account. That card was delivered to FCC
19 board -- FCCC board chair Sabrina Crawford when Judge
20 Teske and I met with her on May 31, 2013. She was made
21 aware of the pending audit, investigation, and
22 likelihood of adverse action against Mr. Bostock.
23 Judge Teske asked her to keep it all confidential."

24 That's the meeting we discussed earlier;
25 correct?

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1 A. Right, at her dealership.

2 Q. At her dealership. Okay. Now -- and so the
3 card was actually -- so when you say the card was
4 delivered to her, was it you and Judge Teske that
5 delivered the card to her?

6 A. I handed it to her.

7 Q. Okay. Now, again, the FCCC debit card was
8 not really the property of the Clayton County Juvenile
9 Court; correct?

10 A. That's why I returned it to --

11 Q. Okay.

12 A. -- Sabrina.

13 Q. Why didn't you just ask Mr. Bostock to
14 return it to Sabrina?

15 A. Well, at that point, the direction we were
16 headed was obviously termination.

17 Q. Had you told him when you asked him for the
18 card back that you all were planning to terminate him?

19 A. I don't remember telling him that. I mean,
20 it was obvious that something was going on.

21 Q. Did you tell him that he was suspended
22 pending further word or anything else, or did you just
23 tell him to go back to work?

24 A. Mr. Johnson -- and I don't -- I don't
25 remember the date, but Mr. Johnson placed Mr. Bostock

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1 on administrative leave and provided him with a letter
2 of intent to terminate with instructions to report to
3 his office I believe that same day at 4:00 o'clock --

4 Q. Was this --

5 A. -- in the afternoon.

6 Q. Was this contemporaneous with you all asking
7 for the card back or shortly thereafter?

8 A. It was shortly thereafter. It may have been
9 a day or two after that. Seems to me there was a
10 weekend in between those two events.

11 Q. If I'm reading your time line correctly
12 here, you're saying, "We received the answers on
13 May 31. At that time I" -- you -- "demanded that
14 Mr. Bostock surrender the FCCC debit cards and
15 checkbooks."

16 So you got his answers, and you went to him
17 at that point in time and said surrender this stuff?

18 A. Correct.

19 Q. Okay. So had you all at that point -- when
20 I say you all, I guess had Judge Teske at that point
21 stated to you definitively that he was going to
22 terminate Gerald Bostock?

23 A. On May 31st?

24 Q. Yes, sir.

25 A. Yes.

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1 Q. Okay. So when you said you were heading in
2 that direction, well, it wasn't that you were still
3 deliberating. The decision had been made.

4 A. After we met with Judge Teske, yes.

5 Q. Was the decision made before or after
6 Gerald's answers to the questions were submitted?

7 A. The decision was made after.

8 Q. Okay. How soon afterwards?

9 A. Very quickly, if I recall. I don't remember
10 if it was the same day, but it would have been in very
11 short succession.

12 Q. Was there something in his answers to
13 questions that triggered that decision?

14 A. I think the answers to his questions did not
15 alleviate the concerns that were held by Judge Teske,
16 John, and I.

17 Q. Can you give me any specifics? What were
18 the concerns that were not alleviated by his answers?

19 A. The explanations for the dinners with the
20 same people over and over and how that contributed to
21 CASA volunteers, not volunteers for FCC but CASA
22 volunteers, because those funds, again, were taken from
23 the GAL account, which is supposed to recruit CASA
24 volunteers. I think there's an important distinction
25 that should be observed, and that is two sets of

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1 volunteers work with Mr. Bostock, and he recruited
2 both. One was for the FCC to do fundraising events and
3 things like that. The other was people to serve in
4 that GAL role. And the GAL funds that were collected
5 were supposed to go for that effort.

6 Q. Well, does the MOU make that clear?

7 A. It's volunteer recruitment, training, and
8 retention.

9 Q. That's what it says. It says --

10 A. It's a GAL memo -- I mean, memorandum of
11 understanding. It's not for the Friends of Clayton
12 County CASA's development on fundraising. Nowhere in
13 the MOU does it say anything about fundraising.

14 Q. It says, "The Clayton County CASA Advisory
15 Board is the recipient of the administrative fee and
16 will use the fees to fund volunteer recruitment,
17 training, and retention." That's what it says; right?

18 A. Right.

19 Q. It does not specifically say solely for the
20 GAL program, does it?

21 A. Doesn't specifically say that, no.

22 Q. Okay. All right. So let me show you what's
23 marked as Exhibit 17.

24 (Exhibit Number [P-17](#) was presented.)

25 / / /

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1 BY MR. BUCKLEY:

2 Q. Excuse me. This is a letter dated June 3rd,
3 2013, to Gerald Bostock signed by John P. Johnson III
4 with a c.c. to Judge Steven C. Teske and to Colin Slay.
5 This is the letter -- or the termination letter that
6 you were just referring to a minute ago; right?

7 A. It is.

8 Q. Okay. And it shows a June 3rd date. Your
9 June 7th memorandum says, "We received the answers on
10 May 31, 2013. At that time, I demanded that
11 Mr. Bostock surrender the FCC debit cards and
12 checkbooks."

13 So I just want to be clear. Did you ask him
14 to surrender those when you handed him that letter?

15 A. No.

16 Q. Did Johnson hand him the letter, or did you
17 hand him --

18 A. I believe John handed him the letter.

19 Q. Were you present when the letter was handed
20 to him?

21 A. I don't remember if I was or not.

22 Q. Okay. Who drafted the letter?

23 A. Mr. Johnson.

24 Q. He did? Did he have any help from anybody
25 else?

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1 A. Not that I'm aware of. I don't know.

2 Q. Okay. But Johnson was not the decision
3 maker. It was Judge Teske, the decision maker, your
4 testimony; right?

5 A. Yes.

6 Q. Okay. So then you say that the "card was
7 delivered to the FCC board chair, Sabrina Crawford,
8 when Judge Teske and I met with her on May 31."

9 So it was May 31 that you all told her that
10 Bostock's termination was imminent. Do you know if
11 that June 3rd letter was handed to him on June 3rd, or
12 was it handed to him at an --

13 A. I believe it was --

14 Q. -- earlier time?

15 A. -- handed to him the morning hours of June
16 3rd.

17 Q. Okay. So the decision was made on May 31st.

18 A. Right.

19 Q. Okay. You don't mention it in this memo,
20 but at that meeting is also when Ms. Crawford was told
21 of the reasons for Gerald's termination; right?

22 A. Right.

23 Q. Okay. All right. So then you say, "Also,
24 on May 31, 2013, Judge Teske and I met with DA Tracy
25 Lawson and Chief Investigator Paul Garland to share our

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1 concerns and the findings of the audit. Mrs. Lawson
2 made the determination to open an investigation by her
3 office."

4 Did Judge Teske ask her to open an
5 investigation?

6 A. He didn't ask her. He presented the audit
7 report, there was a discussion about it, and she made
8 the decision.

9 Q. Well, if he didn't want the DA to
10 investigate it, he wouldn't have come to the DA and
11 presented the audit report; right?

12 A. Well, I think he was doing his due
13 diligence. The conversations I had with him is this is
14 part of the process that needs to be handled since
15 we're talking about funds and potentially missing
16 money.

17 Q. Okay. The next paragraph says,
18 "Mr. Bostock's answers to the questions were determined
19 to be insufficient, and on June" -- and you're saying
20 they were determined to be insufficient by whom? By
21 Judge Teske?

22 A. Yes.

23 Q. And then, "On June 3rd, 2013, he was served
24 with a notice of intent to terminate his employment
25 because of negligence, incompetence, and conduct

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1 unbecoming."

2 You're simply taking the language of the
3 letter and reciting it in this document; right?

4 A. Right.

5 Q. Okay.

6 A. Those were the civil service code sections
7 that were --

8 Q. Okay.

9 A. -- cited as cause for termination.

10 Q. Now, you said here, "In the days following,
11 we have continued to uncover evidence of poor record
12 keeping practices and other concerning matters,
13 including missing cash," parenthetical, "cash, checks,
14 and receipts for GAL funds received in 2012, as well as
15 checks and cash received for the 2012 Duck Derby
16 fundraising event were found in the credenza in
17 Mr. Bostock's office on June 6, 2013 -- according to
18 the receipts, \$200 cash is missing -- and money was
19 inventoried and secured in the juvenile court's safe."

20 Did you find those monies?

21 A. The monies were found by Carol Gossett.

22 Q. His successor in interest?

23 A. Correct.

24 Q. And you said there was \$200 in cash missing
25 according to the -- so there were receipts. Do you

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1 still have copies of those receipts and of that
2 documentation?

3 A. I don't know if they are part of the file or
4 not.

5 Q. Okay. Do you know if they're a part of the
6 file that was turned over to the DA?

7 A. I think so.

8 Q. You worked -- you provided the DA with
9 information after Gerald was terminated; right? You
10 personally did?

11 A. Yeah, this memo.

12 Q. Well, this, and then there was some other
13 follow-up --

14 A. There were some --

15 Q. -- writings.

16 A. -- records that he requested that Carol
17 Gossett primarily provided. I had a couple of email
18 exchanges, questions for clarification, that sort of
19 thing.

20 Q. Okay. You said, "The money was inventoried
21 and secured in the juvenile court safe and missing
22 property that was purchased with GAL funds, including a
23 smartphone and digital camera."

24 I'm not sure I can tell what you're saying
25 there.

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1 A. So --

2 Q. How did you -- did you find the phone and
3 the camera, or did you not find the phone and the
4 camera?

5 A. We didn't find them.

6 Q. Okay. And you say --

7 A. Not at that time. I think the camera was --
8 I don't remember if it was the camera or the phone.
9 One of the items was subsequently located, but one of
10 them wasn't.

11 Q. Did you learn ever that Gerald had sought to
12 turn in his phone to the board and they told him to
13 keep it and change the number?

14 A. I didn't know anything about that.

15 Q. Okay. Did you ever find the camera?

16 A. I believe the camera was the item that was
17 found.

18 Q. Okay. And are you saying that the purchase
19 of the camera served no purpose as far as Friends of
20 Clayton County CASA were concerned?

21 A. I'm not saying that.

22 Q. Okay. Because, I mean, I know they had
23 events.

24 A. Right.

25 Q. And they would sometimes make records of the

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1 events, take pictures --

2 A. Sure.

3 Q. -- and whatnot; right? That's not an
4 illegitimate expenditure.

5 A. No. That's not what I was saying.

6 Q. Okay.

7 A. I was just saying we couldn't -- we knew
8 there was a camera, and we couldn't locate it at that
9 time.

10 Q. Okay. Did you ever follow up with the DA's
11 office and say, "Well, we found the camera, and we
12 checked and" --

13 A. Yeah.

14 Q. I don't see any memoranda to that effect.

15 A. It was a phone call.

16 Q. Okay.

17 A. You'd have to -- the DA's office may have
18 records of that or something. I'm not sure.

19 Q. Now, you then say in here, "Subsequent
20 discussions with FCC board members and Child Welfare
21 Services staff also leads me to conclude that Mr." --
22 leads me, that's you -- "to conclude that Mr. Bostock
23 was intentional in his misuse of GAL funds and that he
24 possibly misled FCCC board members about their
25 responsibility to oversee and approve expenditures."

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1 Okay. Who did you talk about on the FCC
2 board?

3 A. Sabrina Crawford was one person.

4 Q. Okay. Who else?

5 A. I think it was -- I know his name is Angel,
6 and I think his last name was Ramos. He is the father
7 of one of our court employees, Annell -- at the time it
8 was Graniella.

9 Q. Okay.

10 A. Those are the two people I remember having a
11 conversation with.

12 Q. Was this after -- you mentioned the one
13 conversation you and Judge Teske had with Sabrina on
14 May 31st. Was this another conversation you had with
15 her?

16 A. No, it would have been that conversation.
17 That's the only conversation I remember having with
18 her.

19 Q. And what was it that she said in that
20 conversation that led you to believe that Gerald was
21 intentional in his misuse of GAL funds and that he
22 misled Sabrina Crawford about her responsibility to
23 oversee and approve those expenditures?

24 A. Primarily her lack of coming to his defense.
25 During the meeting, she didn't offer any explanation as

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1 to how they were, you know, managing or overseeing the
2 expenditures. She didn't say, "Oh, we approved that
3 and that, and that's okay. That's the way we
4 operated."

5 Q. If she testified that she did, would you
6 disagree with that?

7 A. I don't recall her doing that.

8 Q. Okay. What about Ramos, what did Ramos say
9 that caused you to believe that "Bostock was
10 intentional in his misuse of GAL funds, and that he
11 possibly misled FCCC board members about their
12 responsibility to oversee and approve expenditures"?

13 A. He was involved in helping with the
14 construction of the Duck Derby structure, a ramp and
15 there was like a tower that the people stood on to
16 start the Duck Derby. And he alluded to materials that
17 were purchased during that time being used to repair or
18 improve something at Gerald's home.

19 Q. You say he alluded to that. First of all,
20 when did you have the conversation with Mr. Ramos that
21 you're referring to?

22 A. It would have been very close to when all of
23 this was happening. I don't remember the exact date.

24 Q. And what was the thing Mr. Ramos said that
25 building supplies were used for to repair something at

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1 Gerald's home? What was the thing that was being
2 repaired at Gerald's home?

3 A. I don't recall what it was. It seems like
4 it had something to do with the back porch or
5 something, but I don't --

6 Q. Okay.

7 A. -- remember at this point what exactly it
8 was.

9 Q. Did you document this conversation with
10 Mr. Ramos in any way?

11 A. No, I did not.

12 Q. Okay. Did you ever go out to Gerald's house
13 to see if he had any recent repairs to his back porch
14 or any other part of his house?

15 A. I've been to Mr. Bostock's house, but I'd
16 never -- not at that time.

17 Q. Okay. Did you ever verify in any way
18 whether or not Mr. Ramos -- what he said was true, or
19 was it just a supposition on his part?

20 A. I don't know. I mean, I didn't take any
21 action to independently verify it. At this point my
22 involvement with this was concluded.

23 Q. Well, what I'm just -- you know, if you're
24 saying that he told you this, I mean, that's a serious
25 accusation, that he was using CASA funds to fix his

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1 back porch, for example.

2 A. Right.

3 Q. And I'm just wondering. You said he alluded
4 to that. Did he -- was this speculation on his part?
5 Did he say, "I saw Gerald take building supplies," or
6 "I went over to Gerald's house and fixed his porch," or
7 what did he say, or do you remember?

8 A. I don't remember exactly that conversation.

9 Q. Okay.

10 A. Mr. Johnson had a more in-depth conversation
11 with him, and that's how it came up is me mentioning
12 the conversation with Mr. Johnson that he had had. And
13 he -- when I say he alluded, he more or less confirmed
14 that conversation had occurred.

15 Q. He --

16 A. Mr. Ramos.

17 Q. -- Johnson? Johnson confirmed to you that a
18 conversation happened with Angel --

19 A. No, no. Mr. Johnson, I think prior to this,
20 had had a conversation with Mr. Ramos. And then when I
21 was talking to him, I mentioned it, and Mr. Ramos
22 confirmed the conversation with Mr. Johnson.

23 Q. Okay. And as far as Ms. Crawford's
24 concerned, the conversation that you're referencing
25 which caused you to conclude that "Bostock was

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1 intentional in misuse of GAL funds and possibly misled
2 FCCC board members" was based on her not responding to
3 the accusations that you and Teske leveled against
4 Gerald at your meeting with her on May 31st at her
5 dealership.

6 A. Correct.

7 Q. Okay. It was not based on anything
8 affirmative that she said, such as, "Oh, my gosh,
9 Gerald's been misleading us. I didn't realize that."

10 A. No. Those comments came more from the Child
11 Welfare staff themselves.

12 Q. All right. Well, let's talk about the Child
13 Welfare staff. Who on the Child Welfare staff did you
14 talk to?

15 A. Subsequent to all of this?

16 Q. Well, I mean, I'm specifically referencing
17 what you say here, "Subsequent discussions with FCC
18 board members and Child Welfare Services staff leads me
19 to conclude." So who on Child Welfare staff did you
20 talk to that caused you to draw this conclusion?

21 A. Carol Gossett was one person.

22 Q. Okay.

23 A. Concilia Chillumuna.

24 Q. Spell that.

25 A. It's Concilia, C-o-n-c-i-l-i-a. Chillumuna

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1 is C-h-i-l-u-m-u-n-a, I believe.

2 Q. Okay. Who else? Anybody else?

3 A. Those were the two I recall conversations
4 with. There could have been more, but I don't -- there
5 weren't a lot. It was those two primarily.

6 Q. Did you take any notes from any of those
7 conversations?

8 A. I may have. I couldn't find them when we
9 went through the discovery.

10 Q. Okay.

11 A. So I don't know what happened to them, if I
12 discarded them.

13 Q. What did Gossett tell you specifically about
14 misuse of GAL funds?

15 A. Both of them alluded to taking certain staff
16 members to lunch multiple times and, you know, seeming
17 to purposefully not include other people. In other
18 words, there were certain people he would take to lunch
19 more often than anybody else. That was primarily the
20 thing, just the way he was spending the money. Also,
21 that many of the people that he claimed were volunteers
22 were actually close friends, stuff like that.

23 Q. Did those close friends volunteer?

24 A. I don't -- I don't know for sure if they did
25 or not.

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1 Q. I mean, if they did, it wouldn't be anything
2 wrong with recruiting your friends, would there?

3 A. Not necessarily. Might be something wrong
4 with wining and dining them multiple times.

5 Q. If he did that. Did they tell you he was
6 wining and dining his close friends multiple times?

7 A. That's what they alluded to, that he was
8 going out with his friends to restaurants and bars,
9 that it really had nothing to do with CASA, he's just
10 taking his friends out.

11 Q. When you say alluded, are you saying they
12 stated that?

13 A. I can't remember exactly what they said.

14 Q. Well, I --

15 A. See, that's why I'm saying alluded. I don't
16 really recall word for word what was said.

17 Q. All right. It's important.

18 A. Sure.

19 Q. If I accused you of theft point blank, that
20 would be a serious allegation. If I said, "Well, I
21 don't trust" -- "I wouldn't leave my wallet in the same
22 room with Colin Slay" --

23 A. Right.

24 Q. -- I might be alluding to my suspicion that
25 you're a thief, but I haven't accused you of being a

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1 thief. That's why I'm asking you --

2 A. Right.

3 Q. -- this way. So when you say they alluded,
4 it sounds like they broadly and generally said, "Well,
5 we didn't think he should be spending money on lunches
6 this way, and he took some people to lunch more than he
7 took others."

8 A. Right.

9 Q. Do you know, for example, did they say --
10 when you say staff members, you mean staff members of
11 Friends of --

12 A. No.

13 Q. -- CASA?

14 A. The court employees.

15 Q. Court employees. Do you know whether any of
16 the staff members that he took to lunch were also
17 involved in recruiting or training members of Friends
18 of Clayton County -- excuse me. Strike that. Do you
19 know if any of the staff members he took to lunch were
20 involved in recruiting or training or sustaining
21 volunteers for the Guardian Ad Litem program?

22 A. All of them were involved in that process.
23 That was their job. They were supervisors of the
24 volunteers, which innately, you know, includes keeping
25 the volunteer engaged with the program.

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1 Q. So taking some -- taking somebody who's
2 involved in training to lunch could be a legitimate
3 activity for these funds; correct?

4 A. Sure.

5 Q. Okay. And they said maybe he was being --
6 showing favorites or something doing that.

7 A. But what they were referring to wasn't
8 taking volunteers to lunch. It was taking the staff to
9 lunch.

10 Q. Well, no, no, I get it. I get it.

11 A. Okay.

12 Q. But the staff members were -- some of them,
13 at least, were involved in either recruitment or
14 training or retention of GALs; correct?

15 A. Yes.

16 Q. Right. Okay. So -- follow me here. So
17 taking them to lunch, for example, to discuss training
18 or to keep them happy or whatever the case may be,
19 could be a legitimate expenditure of those funds.

20 A. I wouldn't agree with that.

21 Q. Because --

22 A. You're taking a county employee to lunch to
23 talk about them doing their job, and you're using
24 county funds to do that. That's not allowed under --

25 Q. Wait.

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1 A. -- the court.

2 Q. That's not county funds.

3 A. They are -- they are court generated funds.

4 Q. These are not county funds. They are funds
5 that belong to a nonprofit; correct? If they were ever
6 county funds, then they would have been written on a
7 check to the county.

8 A. Which now happens because that MOU was not
9 done properly.

10 Q. You're right. Now it happens.

11 A. It happens now because when Mr. Bostock
12 drafted the MOU, he set it up the way that it was.

13 Q. How do you know --

14 A. That was done in error.

15 Q. How do you know Mr. Bostock drafted --

16 A. I was told by Mr. -- by Judge Teske that he
17 was involved, he's the one that drafted the original
18 MOU.

19 Q. How does Teske know? He wasn't even a
20 signatory to it.

21 A. He was a judge at the time.

22 Q. He was not signatory to this.

23 A. But he was a judge at the time. I take his
24 word. He's an honorable man. He's a judge.

25 Q. Well, I'll submit to you that Mr. Bostock is

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1 an honorable man too, sir.

2 A. I'm not questioning that at this point.

3 MR. HILL: Just wait for him to ask a
4 question.

5 BY MR. BUCKLEY:

6 Q. All right. So regardless of the
7 draftsperson of the MOU, the MOU said what it said, and
8 it was signed -- if people didn't like the way it was
9 drafted, they could have said, "Well, I'm not signing
10 this." But the chief judge of the superior court
11 signed it, and the chief judge of the juvenile court at
12 the time also signed the document, as did Mr. Bostock.
13 He didn't force it on them, as far as you know. They
14 signed it. They consented to its terms. True?

15 A. As far as I know.

16 MR. HILL: Object to the form of the
17 question.

18 BY MR. BUCKLEY:

19 Q. All right. So nobody's going to accuse
20 Mr. Bostock of being a lawyer. Okay? We can accuse a
21 few other people in this room of that, but we can't
22 accuse him of that. And nobody's going to say, "Gee,
23 whiz, he should have been more lawyerly in drafting
24 this document," because he's not a lawyer. But,
25 subsequently, other MOUs were drafted once the audit

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1 was performed and there was a recognition that the
2 original MOU was not specific enough in discussions of
3 how money should be expended and duties and things like
4 that; right?

5 A. Correct.

6 Q. All right. Now, I want to show you some
7 exhibits. This is Plaintiff's 36. It was just -- I've
8 got three -- can y'all share that?

9 MR. HILL: We've got them.

10 MR. BUCKLEY: Okay. All right. Thank you.

11 MR. HILL: We have them.

12 (Exhibit Number [P-36](#) was presented.)

13 BY MR. BUCKLEY:

14 Q. So this is Plaintiff's 36. This document is
15 dated August 9th, 2013. This is just basically two
16 months after Gerald was terminated; right?

17 A. Correct.

18 Q. And do you know who drafted this particular
19 document?

20 A. I don't know for sure.

21 Q. Okay. And this document was drafted as part
22 of an effort to remediate some of the perceived
23 defects -- some defects that the audit perceived in
24 Plaintiff's Exhibit Number 3, the original MOU; right?

25 A. Yes.

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1 Q. Okay. And an honest reading of that audit
2 report, which you have in front of you, is very, very
3 critical of the lack of guidelines in the MOU; correct?

4 A. In the MOU, yes.

5 Q. Right. Okay.

6 A. As well as the lack of procedures and
7 policies for the Friends.

8 Q. Right. We can probably argue the rest of
9 the deposition about whether those procedures and
10 policies should have been in the MOU --

11 A. Sure.

12 Q. -- or in the bylaws of Friends --

13 A. Right.

14 Q. -- of Clayton County CASA. But the audit
15 was critical of the lack of procedures and guidelines
16 regardless -- in the handling of Friends of Clayton
17 County CASA funds; right?

18 A. Correct.

19 Q. And so this MOU, which was drafted and
20 submitted just a couple of months after Gerald was
21 fired, was meant to remedy some of those defects;
22 right?

23 A. Right.

24 Q. And let's look at Section 2 for a minute.
25 Administrative fee, that's on page 2 of this document.

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1 MR. BUCKLEY: We're going to need to get
2 Bates numbers ultimately on these, by the way.

3 MR. BUECHNER: We will.

4 MR. BUCKLEY: Okay. All right.

5 BY MR. BUCKLEY:

6 Q. So, again, it recites that CASA will charge
7 a flat \$500 administrative fee. It's basically -- the
8 first paragraph is the same as the first paragraph in
9 Plaintiff's Exhibit 3; right?

10 A. Yes.

11 Q. Then the second paragraph says, "Order for
12 payment of costs of guardian ad litem services will be
13 sent to the respective parties by the Clayton County
14 Superior Court and shall include the following
15 statement: Cash and money order are acceptable means
16 of payment. No personal checks will be accepted.
17 However, a check drawn on the respective attorney's
18 firm will be accepted for payment."

19 Very similar to Exhibit 3; right?

20 A. Correct.

21 Q. Then it goes on and says, "All fees shall be
22 paid to the clerk of the Juvenile Court of Clayton
23 County, Georgia, to be separately accounted for and
24 designated as GAL Superior Court Program and to be
25 distributed for the support of the CASA volunteer

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1 program, including recruitment, training, and retention
2 of CASA volunteers and to support CASA volunteer
3 activities in furtherance of CASA objectives."

4 So the payee is really who gets changed in
5 this; right?

6 A. That's right.

7 Q. And the payee, which was Friends of Clayton
8 County CASA, becomes the Juvenile Court of Clayton
9 County; right?

10 A. That's right.

11 Q. Okay. And then once it is paid into the
12 Juvenile Court of Clayton County, do you know if those
13 funds were then paid over to Friends of Clayton County
14 CASA?

15 A. No.

16 Q. They were not?

17 A. They remain in the juvenile court.

18 Q. So one of the -- one of the side benefits to
19 the juvenile court of this whole event was that funds
20 that were going to an outside nonprofit now were going
21 into the coffers of the juvenile court; correct?

22 MR. HILL: Object to form.

23 BY MR. BUCKLEY:

24 Q. Go ahead.

25 A. They go into the coffers of the juvenile

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1 court to be used for the purposes in the --

2 Q. Okay.

3 A. -- MOU, yes.

4 Q. So two months after Gerald was fired, the
5 payment plan is changed and funds are going into the
6 juvenile court. Then there is another recitation of
7 the roles and responsibilities of the CASA volunteers.
8 Did that change dramatically, or was it pretty much the
9 same?

10 A. I believe it's very -- if it changed at all,
11 it may have been a correction, but it's essentially the
12 same.

13 Q. Okay. All right. If the \$500 was going to
14 the juvenile court, to the clerk of juvenile court
15 instead of to Friends of Clayton County CASA, who
16 oversaw the use of those funds?

17 A. So Concilia Chilumuna, who is now the --
18 fills the role that Gerald was in, Child Welfare
19 Services coordinator, she will come to the chief of
20 staff, the current chief of staff, when she has an
21 expenditure that she wants to make.

22 Q. Okay.

23 A. Chief of staff reviews that and approves
24 that. Then the clerk issues the check.

25 Q. Any expenditure whatsoever?

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1 A. As long as it's related to recruitment,
2 retention, and training of volunteers --

3 Q. Okay. What if she --

4 A. -- of CASA.

5 Q. And I'm just going to give you a couple of
6 hypotheticals here. What if she wanted to take her
7 staff, who's involved in the recruitment and retention
8 and training, what if she wanted to take her staff to
9 lunch? Would she need to get approval in advance?

10 A. That wouldn't be approved.

11 Q. It would not be approved.

12 A. No.

13 Q. Because --

14 A. It's benefiting court employees. It's not
15 directly related to recruiting or retaining or training
16 volunteers.

17 Q. Okay. But in terms of the nonprofit, in the
18 previous MOU there was nothing that prevented that from
19 occurring from the perspective of the nonprofit.

20 A. Not from -- apparently.

21 Q. Okay. And that was one of the things -- let
22 me be clear on this. Was that one of the things that
23 the auditors took issue with, that funds were being
24 spent, for example, on lunches for court staff? Did
25 they say anything about that?

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1 A. I don't remember if they specifically cited
2 that as an example.

3 Q. Okay. All right. So she couldn't take
4 court staff to lunch. How, if at all, could she use
5 those funds for -- because the court staff are the
6 people who are going to train these guardian ad litem.
7 How, if at all, could she use those funds to train
8 court staff?

9 A. So CASA -- well, prior to the pandemic, they
10 would do an annual training event, like a conference.
11 And those funds could be used to send an employee to
12 that conference.

13 Q. Okay.

14 A. You know, we might reimburse something like
15 mileage to go to an in-service that's done by Metro
16 Atlanta CASA or another CASA program if we have say a
17 new employee and we need to get them trained.

18 Q. Are there any events that are periodically
19 thrown for volunteers, either for recruiting or
20 rewarding them for their service, recognition
21 ceremonies, anything of that nature?

22 A. Yeah. At the end of a class, a CASA
23 volunteer training class when they complete the
24 training, typically -- and this happened more
25 pre-pandemic, of course.

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1 Q. Right.

2 A. We would hold sort of a cake-and-punch type
3 reception, invite family and friends.

4 Q. Okay.

5 A. That's when the volunteers would be sworn
6 in --

7 Q. No alcohol though.

8 A. -- by the judge. No. It's held in the
9 juvenile court building, so no. No alcohol is
10 involved.

11 Q. Right. It's no alcohol service because it's
12 in a government building, or it's no alcohol service
13 because that is viewed as an inappropriate use of
14 funds?

15 A. It would be both, but the county does not
16 allow alcohol on the premises.

17 Q. Okay. All right. So let me show you what's
18 marked as Exhibit 37.

19 (Exhibit Number [P-37](#) was presented.)

20 BY MR. BUCKLEY:

21 Q. This is another MOU, again, between the
22 Superior Court of the State of Georgia for the County
23 of Clayton and the Clayton County Juvenile Court. And
24 I just want to note too, going back to the previous
25 Exhibit 36, in Plaintiff's Exhibit 3, the original MOU,

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1 Clayton County CASA was a party to the agreement;
2 right?

3 A. This is the original. Yeah, that's the
4 original. Yes, it was.

5 Q. They are no longer going forward -- in any
6 of these MOUs, they are no longer parties to these MOUs
7 concerning expenditure of the \$500 fee paid into the
8 court?

9 A. Friends of CASA or CASA -- Clayton County
10 CASA program?

11 Q. Clayton County CASA.

12 A. Not directly. I mean --

13 Q. Okay.

14 A. -- the MOU is with the juvenile court under
15 which Clayton County CASA, of course, falls.

16 Q. Okay. Well, is Clayton County CASA sort of
17 a subsidiary of the -- are they a separate corporation?

18 A. No.

19 Q. What are they?

20 A. It's a unit within the --

21 Q. Okay.

22 A. -- juvenile court, Child Welfare Services.

23 Q. All right. Why are they no longer a party
24 to the MOU?

25 A. That's the way that Judge Teske wanted it.

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1 It was directly with the court. There was no real
2 reason to have them as part of it since they fall
3 within the auspices of the court anyway.

4 Q. Did Judge Teske draft Plaintiff's Exhibit
5 36?

6 A. I don't know who drafted 36 or 37.

7 Q. But he had input into it; right?

8 A. Yeah, he certainly approved whatever was --

9 Q. You said, in so many words, that's the way
10 Judge Teske wanted it.

11 A. Well, right. And these were done because
12 the judges changed.

13 Q. Okay.

14 A. It's just more or less a renewal of the --
15 with the new judges.

16 Q. All right. So this new one that is -- was
17 signed on March 20th, 2018, I guess it was actually
18 filed in Clayton County March 21st, 2018. You say this
19 was just prepared and signed because the judges
20 changed?

21 A. Yes. I don't -- I can't say with certainty
22 something -- you know, some word or something wasn't
23 changed. There was nothing substantial with the way
24 that the program operates that was changed with any of
25 these subsequent -- the Exhibit 36 or 37.

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1 Q. Okay.

2 A. It was primarily because we had a new set of
3 judges and new chief judge in superior court.

4 Q. Okay. And so for going back to 36, this is
5 the first MOU that was signed by Judge Steven Teske;
6 correct?

7 A. I believe. Yes, that's right.

8 Q. Okay. Now, Simmons, Matthew O. Simmons, it
9 says Matthew O. Simmons is the judge. He was the chief
10 judge previously; right?

11 A. That's right.

12 Q. When Exhibit 3 was signed.

13 A. Right.

14 Q. Okay. So he had stepped down from being the
15 chief?

16 A. They have a system where they rotate every
17 so many years. I'm not exactly sure what it is, but --

18 Q. Is Judge Teske still a chief judge?

19 A. He will be until the end of this month.

20 Q. Right. Okay. Will a new MOU be signed?

21 A. It will. We'll have a new chief judge
22 and --

23 Q. Okay.

24 A. -- we'll go through that --

25 Q. All right. Now --

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1 A. -- process again.

2 Q. -- I also note that the people who are
3 signing Exhibit 36, you've got the chief judge of the
4 superior court, a judge of the superior court, another
5 judge of the superior court, one, two, three, four
6 judges of the superior court, and then the chief judge
7 of the juvenile court. Was every judge of the juvenile
8 court required to sign this document?

9 A. No, just Chief Judge Teske.

10 Q. Why, if you know, why -- if this is a
11 directive that fees be paid to the clerk of the
12 Juvenile Court of Clayton County, to be separately
13 accounted for and designated as GAL Superior Court
14 program, why was it necessary for the other superior
15 court judges who aren't really involved with these
16 funds to sign off on this document?

17 A. I don't know.

18 Q. So 37 is simply an update for the purpose of
19 the changing of personnel at the judge level?

20 A. Yes, sir, I believe so.

21 Q. Okay. And 38, is that -- Exhibit 38, let me
22 hand you that.

23 (Exhibit Number [P-38](#) was presented.)

24 BY MR. BUCKLEY:

25 Q. This is an MOU dated February 20 -- I'm

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1 sorry, February -- well, signed in February of 2017,
2 which was entered filed in Clayton County Superior
3 Court on February 22nd, 2017.

4 MR. HILL: Wait. Which one are you looking
5 at? I'm sorry.

6 MR. BUCKLEY: Wait a minute.

7 THE WITNESS: 38.

8 BY MR. BUCKLEY:

9 Q. Maybe I got my exhibits confused. One
10 second. Okay. 37 was March 21st. 38, I guess, is
11 actually prior to that, February 2017.

12 A. Right.

13 Q. Okay. So this was another instance of sort
14 of the changing of the guard?

15 A. That's what it was, yes, sir.

16 Q. Okay.

17 A. Judge Collier was the chief judge at that
18 time.

19 Q. I see. Okay. In your memorandum, you list
20 a number of people that you say, "I believe the
21 following persons have information relevant to this
22 investigation." And you list Judge Teske, Johnson,
23 Carol Gossett. Who is Becky Galbreath?

24 A. She was a CASA volunteer training supervisor
25 at that time, I believe. So she was the person

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1 responsible for training the CASA volunteers.

2 Q. Was she a juvenile court employee?

3 A. She was.

4 Q. Is she still employed by the juvenile court?

5 A. No.

6 Q. You list Kimberly Walker?

7 A. Yes, sir.

8 Q. Was she also a CASA volunteer or trainer?

9 A. She wasn't a trainer. She was a supervisor.

10 Q. Of the CASA volunteers?

11 A. Of just volunteers, right.

12 Q. Is she still employed by the juvenile court?

13 A. She is not.

14 Q. Were either Galbreath or Walker, did they
15 leave voluntarily or involuntarily?

16 A. Both voluntarily.

17 Q. Okay. You mention Requeral Stoutamire,
18 Mr. Bostock's program assistant. Is Stoutamire still
19 employed?

20 A. No, sir.

21 Q. Did Stoutamire leave voluntarily or
22 involuntarily?

23 A. I believe she actually, if I remember
24 correctly, resigned in lieu of termination.

25 Q. Okay. Do you know what the reason was?

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1 A. Just repeated problems with performance,
2 kind of a multiple --

3 Q. Okay.

4 A. -- issue.

5 Q. You list Shelley Johnson, Clayton County
6 Juvenile Court. Who is she?

7 A. She was a CASA volunteer supervisor, and I
8 believe she did some of the GAL cases, the superior
9 court GAL cases.

10 Q. When you say she did, did she serve as a
11 guardian ad litem?

12 A. I think she did in that role as well as, you
13 know, managed some of the volunteers that served in
14 that role as well for a while.

15 Q. Is she still employed by the juvenile court?

16 A. No. She retired.

17 Q. Annell Graniella, who is she?

18 A. She was a CASA volunteer supervisor. She is
19 now -- goes by Annell Hudson, and she is the current
20 Citizen Review Panel coordinator.

21 Q. So she's still employed by the court?

22 A. Yes, sir.

23 Q. Tell me what the Citizen Review Panel
24 coordinator does.

25 A. So when kids are placed into foster care,

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1 their cases are periodically supposed to come back to
2 the judge for a review hearing. And this program was
3 created by the Council of Juvenile Court Judges some
4 years ago. And basically we have volunteers that are
5 screened and trained, and they review the cases with
6 the child and the DFACS workers and then made a report
7 to the judge in lieu of the actual hearing. It was --

8 Q. Okay. What about Kimberly Walker?

9 A. I think that was a -- I put her down twice,
10 it looks like. It's the same --

11 Q. You did.

12 A. -- person as number 5.

13 Q. Okay. Sorry. Okay. And then Hawa Minor?
14 Am I reading that right?

15 A. That's right.

16 Q. Who is she?

17 A. She was a CASA volunteer supervisor as well,
18 and she's since retired.

19 Q. Concilia Chillumuna?

20 A. Correct, yeah.

21 Q. Who is she?

22 A. She at the time was the Citizen Review Panel
23 coordinator at that time, and she now sits in the role
24 that Gerald was in, the Child Welfare Services
25 coordinator.

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1 Q. So Ms. Gossett is no longer in that role?

2 A. No. She retired a few years ago.

3 Q. Okay. Sabrina Crawford, we know who she is.
4 Stan Owen was an FCCC board member. Is that somebody
5 that you spoke with?

6 A. I don't remember speaking to Stan at all
7 about any of this. But he had pre -- prior to him
8 going to the sheriff's office as the chaplain, he had
9 been a CASA volunteer supervisor with us. And then
10 after that he -- when he went to the sheriff's office,
11 he started serving on the board.

12 Q. He was a board member at or about the time
13 that Gerald was terminated?

14 A. That part I don't -- I don't remember if it
15 was -- if that aligned or if it was before.

16 Q. Debbie Stinson, she was an FCCC board
17 member. Did you talk to her?

18 A. Yeah. She was actually the assistant clerk
19 of court at the time as well, so she was employed with
20 the court.

21 Q. And did you talk to her about --

22 A. I don't recall talking --

23 Q. -- Gerald?

24 A. -- to her as far as the investigation is
25 concerned. I mean, I'm sure there was a conversation

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1 afterward.

2 Q. Okay. Ginger Bedell?

3 A. Yes, she formerly worked for the Clayton
4 County tax assessor office, but she was --

5 Q. A board member?

6 A. Yeah. And I know she worked with the ABC
7 organization as well.

8 Q. And then Shawn Black, you said former
9 employee. That's the guy who wrote the memorandum?

10 A. Correct.

11 Q. Okay. So let's go back for a minute. We've
12 talked about some of these people, and I don't think we
13 need to belabor their knowledge, but you listed these
14 folks. Did you list them because you -- some of them
15 you talked to, obviously Teske, Johnson, maybe Gossett.
16 You have relayed the conversations with Sabrina -- the
17 conversation with Sabrina Crawford. Black, we're
18 talking about the memorandum, but you never talked to
19 him, I think you said.

20 A. I didn't.

21 Q. Okay.

22 A. I don't recall talking to him after.

23 Q. So I'm going to ask you this question with
24 respect to any of the facts leading to Gerald's
25 termination. Okay? Did you personally talk to Becky

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1 Galbreath?

2 A. No.

3 Q. Did you personally talk to Kimberly Walker?

4 A. No.

5 Q. Did you personally talk to Requerel

6 Stoutamire?

7 A. No, sir.

8 Q. Did you personally talk to Shelley Johnson?

9 A. No, sir.

10 Q. Did you personally talk to Annell Graniella?

11 A. There may have been a conversation with her.

12 I don't -- I wouldn't say I didn't, but I don't really
13 recall any major detail of it.

14 Q. You don't remember any specifics?

15 A. No, sir.

16 Q. Okay. Kimberly Walker?

17 A. Same one, no.

18 Q. You did talk to her or you --

19 A. No, I did not.

20 Q. Okay. Hawa Minor?

21 A. No, sir.

22 Q. Concilia Chillumuna?

23 A. I did, specifically when she brought me
24 money that Gerald had told her about I think on the day
25 that he met with John and I for the termination

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1 meeting. There was some money that was in his office,
2 and he told her about it, so --

3 Q. When he told her to turn over the money or
4 what?

5 A. Yeah, to get it.

6 Q. Okay. He wasn't trying to hide the money or
7 make off with it. He was --

8 A. No.

9 Q. -- giving it to the proper person to give it
10 to.

11 A. Right.

12 Q. Okay. So she just brought -- did she bring
13 the money to you?

14 A. Well, he told her -- according to what she
15 told me --

16 Q. Yeah.

17 A. -- he told her she needed to do something
18 with it. And then she brought it to me like, "I don't
19 know what to do with this."

20 Q. When he said she needed to do something with
21 it, was it that vague, or did he tell her you need to
22 give this money to so and so or deposit it here or
23 what?

24 A. The context is this money was money that was
25 collected before. And when I say before, it was when

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1 we were in the other courthouse before we moved into
2 the new courthouse.

3 Q. Right.

4 A. Gerald's unit and Concilia's unit would
5 jointly sell Chick-fil-A biscuits on Friday mornings to
6 raise funds.

7 Q. Okay.

8 A. And I think the intention was that that
9 money was going to be split between those two units.
10 So back to when he brought her the money, I think he
11 was saying, "Hey, we never split this. You need to do
12 something with it."

13 Q. So he wasn't telling her to do anything
14 improper with it.

15 A. No, I don't think that was --

16 Q. Okay.

17 A. -- the intention.

18 Q. And if I understand the directive in the
19 original MOU, often this \$500 payment, maybe not all
20 the time, but frequently it was made in cash; right?

21 A. I don't know how often it was -- I know
22 there was some cash that was involved, but I don't know
23 how often.

24 Q. Well, I think the MOU does say it can be
25 made in cash.

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1 A. Yeah, I think -- yeah, that's right.

2 Q. And so it would not be, if Gerald's suddenly
3 terminated, it would not be unusual or surprising that
4 there could be cash in his office that had been paid to
5 be deposited with Friends of Clayton County CASA;
6 right?

7 A. It wouldn't surprise me to find money there,
8 you know, that had been recently received, yeah.

9 Q. All right. Okay. So the extent of what
10 Concilia knows is that Gerald told her or showed her or
11 gave her some cash. Was this at the time he was
12 terminated he said, "I'm being terminated, you need to
13 take care of this"?

14 A. I believe it was the day of the meeting.

15 Q. Okay.

16 A. I mean, I don't want to be held to that
17 because I'm not a hundred percent sure, but it was
18 sometime very close to that date.

19 Q. It's your understanding or recollection that
20 at or about the time that Gerald was directing her or
21 asking her to handle the proper distribution of that
22 cash because he was being taken out of his position?

23 A. I mean, I would assume. I don't know for
24 sure.

25 Q. Okay. Did he get put on a leave of absence

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1 first?

2 A. Yes.

3 Q. So he may have done it when he was put on
4 leave of absence. He may have said, "Hey, you need to
5 handle this." Right?

6 A. That could have been.

7 Q. Okay.

8 A. I don't know for sure.

9 Q. You're not -- I mean, by her bringing the
10 money to you, you're not suggesting that there's any
11 inference of wrongdoing on Gerald's part for asking her
12 to handle that.

13 A. No, I'm not suggesting that.

14 Q. All right. So did you ever talk to Stan
15 Owen about Gerald's -- the events leading to Gerald's
16 termination?

17 A. No, sir.

18 Q. Did you ever talk to Debbie Stinson about
19 the events leading to Gerald's termination?

20 A. I believe after the fact because we worked
21 with the clerk's office to set up the -- you know, the
22 receipt of the money and --

23 Q. Okay.

24 A. -- all of that.

25 Q. So, to be clear, you know, you mention she's

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1 an FCCC board member here.

2 A. Well, I believe she was -- she may have been
3 on the board of the -- I know she was heavily involved
4 with the Ambassadors --

5 Q. Okay.

6 A. -- program. But so that may be a mistype or
7 a mislabel.

8 Q. Okay.

9 A. I don't know for sure, though, if she was
10 ever on the actual board of the Friends.

11 Q. So it sounds to me, with respect to Ginger
12 Bedell, that you talked to her only about setting up
13 the new payment program and not specifically about any
14 alleged wrongdoing on Gerald's part.

15 A. That would have been Debbie Stinson.

16 Q. Sorry. Excuse me.

17 A. Yeah.

18 Q. Ms. Stinson.

19 A. Yeah, I believe that's the case. And there
20 may have been some conversation about what happened,
21 you know, that occurred sort of --

22 Q. Okay.

23 A. But I don't remember it.

24 Q. But she -- in other words, I just want to
25 make sure if she's a witness with material knowledge --

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1 A. Right, right.

2 Q. -- of alleged wrongdoing. You don't know of
3 any.

4 A. I don't think that's the case. I mean, I
5 don't know that, but --

6 Q. Right.

7 A. -- I mean, she never stood out as a person
8 that should be interviewed or anything like that.

9 Q. She never told you --

10 A. No, no, no.

11 Q. -- "I know about some wrongdoing"?

12 A. No, nothing like that.

13 Q. Okay. Shawn -- okay. So we -- and Ginger
14 Bedell, she's a board member. Did you talk to her?

15 A. I didn't talk to her. Most of these
16 people -- this list was compiled because those -- I was
17 instructed to provide him with a list of people I
18 thought might have knowledge.

19 Q. Okay.

20 A. And so because all of these folks I knew
21 were affiliated either with the CASA program or the
22 board.

23 Q. Okay. So these are not people that you --

24 A. They're not people I talked to --

25 Q. -- that you talked to or that you even --

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1 A. -- necessarily.

2 Q. -- knew had specific knowledge of any
3 alleged wrongdoing --

4 A. Right.

5 Q. -- on Gerald's part.

6 A. Right.

7 Q. Okay.

8 A. I would say that.

9 Q. All right. So then you say in the final
10 paragraph of your memorandum, "It should be noted that
11 in the midst of the investigation, Judge Teske directed
12 that all GAL funds be paid to the clerk of the juvenile
13 court for proper accounting and to be held in trust
14 until proper oversight and control mechanisms could be
15 put in place by the juvenile court and Clayton County
16 Finance."

17 Did he enter an order to that effect? What
18 did he do there?

19 A. No, that -- are you referring to the -- like
20 the mechanisms of control, the --

21 Q. Yeah. All I'm saying is was it documented
22 in any way Judge Teske's direction that GAL funds
23 should be paid to the clerk of the court instead of to
24 Friends of Clayton County CASA?

25 A. Well, that was -- it would subsequently be

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1 done in the revised MOU.

2 Q. Okay. And I get that.

3 A. But up until this point, it was just a
4 verbal directive.

5 Q. Just a verbal. Okay.

6 A. Until we -- we had to set up accounts,
7 and --

8 Q. Okay.

9 A. -- that required collaboration with the
10 finance department and all that.

11 Q. Okay.

12 A. So it took some time.

13 Q. All right. I'm going to show you a few
14 other exhibits that I believe pertain to the DA's
15 investigation.

16 (Exhibit Number [P-21](#) was presented.)

17 BY MR. BUCKLEY:

18 Q. This is Exhibit 21. This is a memorandum
19 dated June 12th, 2013. It's actually addressed to
20 Carol Gossett who had assumed Gerald's
21 responsibilities; right?

22 A. Correct.

23 Q. But you're copying John Johnson, director of
24 Juvenile Court Services, and it's from you; right?

25 A. That's right.

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1 Q. And that's your initialing there; right?

2 A. That's right.

3 Q. Okay. And you say that you received a
4 request from Deputy Chief Investigator Allen Crenshaw
5 and asking staff to begin collecting, labeling, and
6 boxing certain original documents. You say financial
7 records, account numbers, bank statements, draft books,
8 receipts of expenses, debit card numbers, and all FCC
9 bank accounts for Friends of Clayton County CASA,
10 Friends of Clayton County CASA d/b/a Guardian Ad Litem,
11 and Ambassadors Behind CASA.

12 The three entities that you list there, as
13 of the time that they had those names, were separate
14 entities from the court; correct?

15 A. Those were actually bank accounts held by
16 the Friends of Clayton County CASA.

17 Q. Okay. So you're directing -- who are you
18 directing? You're directing Ms. Gossett to get these
19 bank records; right?

20 A. That's right.

21 Q. Did Ms. Gossett, the Child Welfare
22 coordinator, have the power to do that with respect to
23 Friends of Clayton County CASA?

24 A. The Friends of Clayton County CASA's
25 paperwork was housed at our court.

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1 Q. Right. And speaking of which, you know, the
2 whole business of whether or not bank records were
3 maintained, did you ever determine that Gerald actually
4 kept each month of bank and financial records for
5 Friends of Clayton County CASA in his office at the
6 court? Did you ever determine that one way or the
7 other?

8 A. I never -- I don't know that that was ever a
9 question that I looked into.

10 Q. Okay. Do you know whether during the audit
11 he made all records available to the auditors that were
12 kept in his office?

13 A. I'm not sure if he did or not. It seems
14 that I remember their saying they were missing records.

15 Q. Okay. Did you ever determine like on a
16 monthly basis or a weekly basis or anything any -- you
17 say it seems they said they were missing records.

18 A. I think that's what the auditors mentioned
19 in the report.

20 Q. Okay. Did you ever determine what months
21 or, you know, what time frames were missing or
22 anything --

23 A. I didn't.

24 Q. -- of that nature?

25 A. I didn't look into that.

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1 Q. Okay. All right. You're asking for
2 incorporation documents, bylaws, any governing policies
3 of FCCC, dates of board meetings of FCCC, and all
4 minutes or records relating to meetings, listing and
5 contact information for all past and present FCC board
6 -- FCCC board members and officers, information
7 pertaining to the Hotlanta Softball League sponsorship,
8 name of team, amount of sponsorship, et cetera, listing
9 and contact information for all CASA staff.

10 Was there any particular reason why you --
11 you know, you sort of broadly alleged that he was
12 taking people to lunch that he shouldn't and having
13 events that maybe he shouldn't have had. Is there any
14 specific reason why you singled out the information
15 pertaining to sponsorship of the Hotlanta Softball
16 League team?

17 A. I didn't single -- this was all requested by
18 Investigator Crenshaw. All I was doing was passing
19 along what he had asked for to Ms. Gossett.

20 Q. But had y'all specifically told Crenshaw
21 about this issue concerning the Hotlanta Softball
22 League?

23 A. It was in the audit report.

24 Q. Okay. All right. Let me show you what's
25 marked as Exhibit 22.

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1 (Exhibit Number [P-22](#) was presented.)

2 BY MR. BUCKLEY:

3 Q. I need to be clear on who this is from,
4 among other things. It says -- it's a document Bates
5 stamped Clayton 904 dash -- 904-905. And it does not
6 appear to be a dated document, but it says, "On
7 December 6, 2013, I sent an email to Colin Slay
8 requesting the following," and it has a list of
9 information. Do you know who wrote this?

10 A. Looks like it was -- it says prepared by
11 Allen Crenshaw, Deputy Chief Investigator, so I assume
12 him.

13 Q. Okay. Oh, I see. Okay. Did you ever see
14 this or was this sent to you or --

15 A. I've never seen this.

16 Q. Okay. He says that he sent a request for a
17 number of things, list of names and application forms
18 of volunteers with CASA, Ambassadors Behind CASA, Duck
19 Derby, Friends of Clayton County CASA, et cetera. Do
20 you recall receiving that request from him?

21 A. I know that he -- after this -- on
22 Exhibit 21, that memo was crafted, we delivered to the
23 DA's office a lot of that stuff. And I do recall
24 receiving a request for some of the same stuff we'd
25 already delivered.

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1 Q. Okay. Did Bostock have a county-issued
2 vehicle?

3 A. A county -- there was a vehicle available
4 for his use. It wasn't specifically issued to him.

5 Q. So it's not a take-home vehicle.

6 A. No, no.

7 Q. Something that was at the workplace that if
8 he needed --

9 A. Yeah.

10 Q. -- to do something he could.

11 A. Like a fleet vehicle.

12 Q. Okay.

13 A. For use for that unit.

14 Q. All right. Let me show you what's marked as
15 Exhibit 23.

16 (Exhibit Number [P-23](#) was presented.)

17 BY MR. BUCKLEY:

18 Q. Did you author this memorandum?

19 A. I didn't. This is not from me.

20 Q. Have you ever seen it before?

21 A. No, sir.

22 (An off-the-record discussion was held.)

23 BY MR. BUCKLEY:

24 Q. So you've never seen this before. It does
25 mention you on the second -- bottom of the second page.

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1 It looks like it's from you, but it's not?

2 A. No. This is -- this is not any -- this
3 looks like it's from the district attorney's office.

4 Q. Okay. And it talks about -- it has attached
5 some stuff that's come off of a criminal history
6 record. Do you know anything about any of that?

7 A. No, sir.

8 Q. None of that pertains to or was a reason for
9 Mr. Bostock's termination?

10 A. No. This was all -- all the dates on this
11 are after that had occurred.

12 Q. After the fact, right. Okay. A few more of
13 these exhibits. This is Exhibit 24.

14 (Exhibit Number [P-24](#) was presented.)

15 BY MR. BUCKLEY:

16 Q. It appears to be a short memorandum from the
17 Office of the District Attorney. It says that, "I
18 received an email from Colin Slay regarding the 2013
19 Duck Derby intakes binder. He advised there was not a
20 2013 Duck Derby, so there's no binder."

21 Has there ever been a Duck Derby since then?

22 A. No.

23 Q. Since Gerald was terminated, I mean?

24 A. No, sir.

25 Q. Okay. The Duck Derby was one of the primary

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1 fundraisers for Friends of Clayton County CASA; right?

2 A. It was.

3 Q. Does that organization still exist?

4 A. Yes.

5 Q. Okay. How do they raise funds? Because
6 they don't get the benefit of the funds paid into the
7 court, what do they do to raise money?

8 A. Well, they still accept like personal
9 donations, and they are the recipient of Chairman
10 Turner -- Jeff Turner, Chairman of the Clayton County
11 Commission, he does a 5K. We just had it two or three
12 weeks ago, and that's an annual event. The proceeds
13 from that 5K go to support CASA.

14 Q. Okay.

15 A. Friends of CASA.

16 Q. Is that their big fundraiser as --

17 A. It is.

18 Q. -- opposed to the Duck Derby?

19 A. And Chairman Turner also does sort of a --
20 it's in the -- during the holiday season sort of a toy
21 drive, and people donate money to the program. That's
22 typically done like in -- right before Thanksgiving.

23 Q. Is he on the -- now on the Friends of
24 Clayton County CASA board?

25 A. Chairman Turner?

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1 Q. Yes.

2 A. No.

3 Q. Okay.

4 A. He's just always been a strident supporter
5 of the CASA program.

6 Q. Okay. Let me show you what's marked as
7 Exhibit 25.

8 (Exhibit Number [P-25](#) was presented.)

9 BY MR. BUCKLEY:

10 Q. It looks like this is from one of the
11 investigators in the office of the DA. And it says,
12 "On Friday, the 31st of January 2014," sometime after
13 Gerald was terminated, "I prepared and sent an email to
14 Colin Slay requesting some information related to the
15 investigation involving Bostock. I requested to whom
16 would be the point of contact for the individuals that
17 could provide me documentation related to the cases
18 that a judge ordered CASA intervention and payments
19 received. I requested an update on the missing GAL
20 bank statements, if they had been recovered. The
21 missing records are as follows: January 2011, May to
22 June 2012, and September to October of 2012."

23 Were those records ever recovered?

24 A. Not to my knowledge.

25 Q. Do you know what they -- now, these are --

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1 the bank statements would have been at least in the
2 control of Friends of Clayton County CASA; right?

3 A. They should have been, yes, sir.

4 Q. Do you know if anybody asked them if they
5 could get those bank statements?

6 A. CASA staff, primarily Ms. Gossett. And I
7 think Ms. Chilumuna went through everything that we had
8 in storage. And I believe they contacted --

9 Q. Okay.

10 A. -- board members to see if they had -- I
11 know they contacted Dee Haney.

12 Q. Okay.

13 A. Who's the current chair.

14 Q. Do you know if they agreed to let you all
15 have the records?

16 A. The records were housed, again, at the court
17 facility. And there was never any hesitance whatsoever
18 on the part of the board.

19 Q. Okay. All right. So you don't know whether
20 those records were ever sent over to the DA's office or
21 not?

22 A. To my knowledge, they weren't.

23 Q. Okay.

24 A. I didn't send them, I can tell you that.

25 Q. All right. So this is Exhibit 26.

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1 (Exhibit Number [P-26](#) was presented.)

2 BY MR. BUCKLEY:

3 Q. It is another email apparently from the DA's
4 office. It says that they received an email response
5 from you in which you directed them to look for the
6 contracts through Carol Gossett; right?

7 A. That Carol would be the best point of
8 contact for information --

9 Q. Okay.

10 A. -- he was seeking.

11 Q. All right. And then Exhibit 27 -- by the
12 way, you haven't seen 26 before yourself; right?

13 A. No, sir.

14 Q. Okay. This is Exhibit 27.

15 (Exhibit Number [P-27](#) was presented.)

16 BY MR. BUCKLEY:

17 Q. This is a memo from Allen Crenshaw. It
18 says, "On Friday, December 6, 2013, I sent an email to
19 Colin Slay requesting the following," and he says,
20 "Minutes for the Friends of Clayton County CASA, Inc.,
21 meetings from July 20, 2011, to such time that Gerald
22 Bostock was terminated," and also "Minutes for the
23 Friends of Clayton County CASA, Inc., Duck Derby
24 meetings, September 14, 2011, at such time
25 Gerald Bostock was term" -- "to such time Gerald

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1 Bostock was terminated from his employment."

2 Do you know if those records were turned
3 over?

4 A. I don't. I don't know. I don't remember.

5 Q. Do you know whether Ms. Gossett had Clayton
6 County -- Friends of Clayton County CASA board meeting
7 minutes in her office?

8 A. Not in her office. They were stored in a
9 storage room in the CASA unit.

10 Q. And the court had custody of those records.

11 A. Yeah, they were kept --

12 Q. Okay.

13 A. I think that was the case, except for a
14 period of time where they maintained an office.

15 Q. Okay. Let me show you what's marked as
16 Plaintiff's Exhibit Number 28.

17 (Exhibit Number [P-28](#) was presented.)

18 BY MR. BUCKLEY:

19 Q. This appears to be an email chain dated in
20 or about December 4th, 2013. It looks like you sent an
21 email on December 4th saying, "I was checking to see if
22 there was any update on the investigation. Mr. Bostock
23 has filed an EEOC complaint."

24 Okay. So was it at or about that time that
25 you learned that Mr. Bostock had filed an EEOC

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1 complaint?

2 A. I believe it would have been directly before
3 that.

4 Q. Okay.

5 A. Mr. Johnson notified me of that.

6 Q. Okay.

7 A. And he's the one that -- I expressly
8 remember he's the one that asked me to get an update on
9 the investigation.

10 Q. Going back to your phone situation, had you
11 switched phones at that point, or did you still have
12 your old telephones?

13 A. On 2000 -- oh, December of 2000 --

14 Q. December 4th.

15 A. -- '13. I believe I had the iPhone at that
16 point.

17 Q. Okay. Why -- what relevance did it have to
18 the investigation that Gerald had filed an EEOC
19 complaint?

20 A. I don't know.

21 Q. Why did you feel the need to tell the
22 investigator that Gerald had filed an EEOC complaint?

23 A. Oh, as I previously stated, I was directed
24 by Mr. Johnson to get an update, and it came in
25 relation to that. But I don't --

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1 Q. Well, I get it. Did Johnson tell you to
2 inform the investigator that Gerald had filed an EEOC
3 complaint?

4 A. Yes.

5 Q. Was it Johnson's desire to get a criminal
6 indictment against Gerald?

7 A. I have no idea what his desire was.

8 Q. Did he ever express that desire?

9 A. No, not that I recall.

10 Q. Did he or you or Judge Teske want Gerald to
11 be criminally indicted in order to defend against any
12 EEOC complaint?

13 A. No.

14 MR. HILL: I'll object to form. Go ahead.

15 BY MR. BUCKLEY:

16 Q. Go ahead.

17 A. No. I expressly remember Judge Teske, for
18 instance, saying he was glad that they didn't find
19 anything and that it went down that road.

20 Q. Okay. So here it says, on December 4th,
21 looks like Dennis Baker writes to you, "Allen Crenshaw
22 and I meet on Friday to go over the bank records we
23 have received and to see if there is any further
24 investigative processes we need to make. May I can
25 you" -- I guess it means -- he meant "may I call you

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1 after that meeting to give you a further update?"

2 Right? And then you said, "That would be great. Thank
3 you, Dennis." Right?

4 A. Uh-huh (affirmative).

5 Q. Did he call you with an update at or about
6 that time?

7 A. I don't remember -- I don't remember a phone
8 call after that.

9 Q. Did they ever call you and say, "We just
10 haven't found evidence to sustain or support an
11 indictment"?

12 A. I never got any information directly from
13 the DA's office about that. I learned of that decision
14 from Judge Teske.

15 Q. Okay. Tell me about that conversation.

16 A. About the conversation with Judge Teske?

17 Q. Right, about that. And, first of all, when
18 was that conversation?

19 A. I don't know. I don't remember. I mean, it
20 would have been maybe a year or two after this, but I
21 don't remember --

22 Q. Okay.

23 A. -- exactly when it occurred.

24 Q. Was it in his chambers?

25 A. Yes. It was --

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1 Q. Okay. Did you frequently meet with Judge
2 Teske in his chambers?

3 A. Yeah, it was a pretty regular occurrence.

4 Q. Okay. Do you ever socialize with Judge
5 Teske?

6 A. I've gone to his house for dinner a few
7 times. And certainly when we've traveled together, you
8 know, we've had dinner and maybe a drink or something,
9 a cigar.

10 Q. What kind of occasions did you and Judge
11 Teske travel on?

12 A. We are part of a technical assistance team
13 is probably the best way to describe it, so we receive
14 requests through the Annie Casey Foundation --

15 Q. Okay.

16 A. -- to provide assistance from other
17 jurisdictions on developing primarily school justice
18 partnerships and sometimes other detention reforms. So
19 that was often where the travel was. There have been
20 other occasions where we've gone to like a judge's
21 conference or --

22 Q. Okay.

23 A. -- we've presented together at some other
24 event.

25 Q. Is that -- that's courthouse business,

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1 right, when y'all have traveled together, I mean?

2 A. Being on --

3 Q. When you and Judge Teske have taken trips
4 together, has it always been on court business?

5 A. I guess you could say that because --

6 Q. Right.

7 A. -- we were traveling on the court -- the
8 county's time.

9 Q. Right. And the county was paying your
10 expenses for the trip?

11 A. No.

12 Q. Did the county pay for your hotel room?

13 A. No.

14 Q. Didn't pay for your dinners or anything?

15 A. No, sir. All of that was paid for by the
16 Annie Casey Foundation.

17 Q. I see. So every time you and Judge Casey
18 traveled -- I'm sorry, Judge Casey -- Judge Teske
19 traveled together, it was on the Annie B. Casey
20 Foundation?

21 A. Not -- when we were doing the technical
22 assistance, that would have been true. Now, there
23 would have been a possible time where we went to a
24 conference, for example, maybe a Coalition for Juvenile
25 Justice conference --

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1 Q. Okay.

2 A. -- where the county would have paid for
3 that.

4 Q. They would have paid your room and board for
5 those trips?

6 A. Right.

7 Q. Okay. How many times do you think you and
8 Judge Teske have gone on such trips?

9 A. At this point, honestly, it's --

10 Q. Handful?

11 A. No, far more than that. I mean, we've been
12 to over 50 jurisdictions.

13 Q. Okay. So when they paid for your meals, did
14 they pay -- did the county pay for your drinks?

15 A. County?

16 Q. Yep.

17 A. No, sir.

18 Q. Who paid -- would the juvenile court pay for
19 your drinks?

20 A. No.

21 Q. Who paid for your drinks?

22 A. I paid for my drinks.

23 Q. Did you -- did the county pay for -- did you
24 like pay for your meal with one credit card and then
25 you paid for your drinks with your personal credit

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1 card?

2 A. They -- no. We pay and have to submit
3 reimbursement for the county.

4 Q. Okay. So --

5 A. They don't do advances.

6 Q. So you pay -- when you do that, when you pay
7 for your dinner and you decide you're going to have a
8 drink with your dinner, do you actually run a separate
9 tab?

10 A. I do. I usually ask -- I explain the
11 situation, and most --

12 Q. Okay.

13 A. I've never had a server look at me funny.

14 Q. How about the cigars? Are those on the
15 county, or are those on you?

16 A. Those are mine.

17 Q. Okay.

18 A. Out of my humidor.

19 Q. All right. So how frequently do you
20 normally meet with Judge Teske in chambers?

21 A. Well, before the pandemic, I would say it
22 was at least weekly, sometimes more frequently just
23 depending on, you know, if I had a matter I needed to
24 discuss with him.

25 Q. Okay. Would you say that you and Judge

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1 Teske are friends?

2 A. I would.

3 Q. Okay. Let me show you Plaintiff's
4 Exhibit 29, which I think is a slightly different
5 version of 28. Okay?

6 (Exhibit Number [P-29](#) was presented.)

7 BY MR. BUCKLEY:

8 Q. In this, it appears to be the same December
9 4th email 2013 that you sent -- excuse me.

10 MR. HILL: Sorry.

11 MR. BUCKLEY: Okay. Thank you.

12 BY MR. BUCKLEY:

13 Q. It appears to be the same December 20 -- I'm
14 sorry -- the same December 4th --

15 A. Right.

16 Q. -- 2013 email you sent saying, "Dennis, I
17 was checking to see if there is any update on the
18 investigation. Mr. Bostock has filed an EEOC
19 complaint. Thanks."

20 And you sent that to Dennis Johnson, and who
21 is Dennis Johnson now?

22 A. He was the -- or is the assistant director
23 of the finance department.

24 Q. Okay.

25 A. I hit the -- I clicked on the wrong Dennis

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1 when I started typing this.

2 Q. Okay. I see. So you sent that --

3 A. It was meant for Dennis Baker.

4 Q. It was meant for Dennis Baker. So then you
5 -- it basically looks like you cut and pasted the very
6 same email and sent it to Dennis Baker; is that right?

7 A. That's what it looks like, yes, sir.

8 Q. Okay. I get it. All right. Thank you.

9 A. Sometimes the fingers are faster than the
10 mind.

11 Q. Right. Okay.

12 MR. BUCKLEY: He needs to change out, so
13 we'll take a break here.

14 THE VIDEOGRAPHER: We're off the record.

15 (VIDEO CAMERA OFF.)

16 (A brief recess was taken.)

17 (VIDEO CAMERA ON.)

18 THE VIDEOGRAPHER: We're back on the record.

19 MR. BUCKLEY: Okay. Good.

20 BY MR. BUCKLEY:

21 Q. In June of 2020, long after Mr. Bostock had
22 been terminated, you sent the internal audit report to
23 Judge Teske. Do you know why you suddenly did that?

24 A. In June of 2020?

25 Q. Yep.

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1 A. It probably would have just been a request
2 from him --

3 Q. Okay.

4 A. -- to provide him with a copy --

5 Q. Do you know --

6 A. -- or send it to him.

7 Q. Was there any event that caused him to
8 request --

9 A. In June of 2020?

10 Q. Yep.

11 A. I think it was probably in preparation for
12 this.

13 Q. For this. Okay.

14 (Exhibit Number [P-30](#) was presented.)

15 BY MR. BUCKLEY:

16 Q. Showing you what's marked as Plaintiff's
17 Exhibit 30. It's just a little short email from you
18 dated 6/16/2020, captioned Bostock Internal Audit
19 Report. It says, "Judge, the internal audit report you
20 requested is attached."

21 He asked for it. You don't know of any
22 event that prompted that?

23 A. I'm not -- I don't know for sure, no.

24 Q. Could it be that that was just a few days or
25 a day or so after the Supreme Court came down with its

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1 decision on this case?

2 A. It might have been. I don't remember --

3 Q. Okay.

4 A. -- when that happened.

5 Q. Do you know what the purpose was of
6 furnishing the audit report? Was that to load up the
7 judge with things to say about Mr. Bostock?

8 A. I was responding to a directive from my
9 supervisor, my boss.

10 Q. All right. Well, let me show you what's
11 marked as Plaintiff's Exhibit 31.

12 (Exhibit Number [P-31](#) was presented.)

13 BY MR. BUCKLEY:

14 Q. This is a document Bates stamped Clayton
15 13336. It's an email from Colin Slay dated June 17th,
16 2020, subject, Mr. Bostock's lawsuit. And I want to
17 know what the recipient group of this is. It says --
18 go ahead.

19 A. It's the entire juvenile court.

20 Q. Everybody in the juvenile court?

21 A. That's employed, yes, sir.

22 Q. So that means all the judges, all the staff,
23 everybody from top to bottom; right?

24 A. Yes, sir.

25 Q. Okay. And here you circulate this, you say,

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1 "Many of you have likely heard about the U.S. Supreme
2 Court decision involving a suit that former juvenile
3 court employee Gerald Bostock filed in response to his
4 termination of employment in 2013. While I cannot
5 comment on pending litigation, I would like to share
6 this article from the Atlanta Journal-Constitution. It
7 gives a different side of the story than the narrative
8 that has been widely portrayed in most other media
9 outlets."

10 Now, when you circulated this -- now, this
11 is an AJC article that discusses an interview with
12 Judge Steven Teske; correct?

13 A. Yes, I believe so.

14 Q. And it's an interview in which Judge Teske
15 basically tells the reporter that Gerald Bostock was
16 not fired because of his sexual orientation, he was
17 fired because of the misappropriation of funds; right?

18 A. I don't remember the exact wording. It was
19 something to that effect.

20 Q. All right. So -- and when you circulated
21 this document to the entirety of the juvenile court,
22 did it occur to you that you, by circulating this, were
23 influencing potential witnesses in the case?

24 A. I did what I was instructed to do.

25 Q. Who told you to do that?

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1 A. Judge Teske.

2 Q. All right. So Teske told you to circulate
3 this. I'm going to ask you the same question. Did it
4 occur to you that you were circulating a version of the
5 facts, if you will --

6 A. I was circulating an article --

7 MR. HILL: Wait. Let him finish the
8 question.

9 THE WITNESS: Oh, I thought he was -- sorry.

10 BY MR. BUCKLEY:

11 Q. Let me finish -- a version of the facts
12 contained in the article, yes, to people who were
13 potential witnesses in the case?

14 A. I didn't consider that.

15 Q. Okay. But, in fact, some of the people who
16 you circulated it to are potential witnesses in the
17 case; right?

18 A. Sure, who have access to the Atlanta
19 Journal-Constitution on their own accord.

20 Q. But by having the -- I guess you're the --
21 at this point you were -- what was your position at
22 this point?

23 A. Director of juvenile court operations.

24 Q. So by having the director of juvenile court
25 operations circulate this article rather than people

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1 just casually reading it in the AJC as they might or
2 might not --

3 A. Right, right.

4 Q. -- you were highlighting a particular
5 version of this facts -- of the facts in this case
6 favorable to Clayton County government to employees who
7 get their paychecks from Clayton County government;
8 correct?

9 MR. HILL: Object to form.

10 A. Again, I was doing as I was instructed.

11 BY MR. BUCKLEY:

12 Q. I got it.

13 A. I didn't put a lot of thought into it. When
14 my boss --

15 Q. Okay.

16 A. -- tells me to do something that's not
17 blatantly illegal, then I do what I'm told to do.

18 Q. Well, do you know if it's illegal or not to
19 circulate a version of the facts to every -- or most of
20 the potential witnesses in the case coming from the top
21 of the Clayton County Juvenile Court administration?

22 A. I would say it's a mischaracterization to
23 say most of the witnesses in the case. As in the other
24 document that we went through where I presented the
25 people that I thought had knowledge of the case, most

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1 of them are no longer employed with this court.

2 Q. Well, there are many people still employed
3 with Clayton County --

4 A. There are about two or three.

5 Q. There are a number of people employed in the
6 Clayton County courthouse who have knowledge of
7 Gerald's performance in his job; right?

8 A. There were two or three left --

9 Q. Okay.

10 A. -- at the time this was sent.

11 Q. Well, let's suppose and imagine you only
12 circulated this to those two or three people.
13 Certainly that would be an effort to influence their
14 outlook on the case and perhaps could influence their
15 testimony; true?

16 MR. HILL: Object to the form of the
17 question.

18 BY MR. BUCKLEY:

19 Q. Right?

20 A. My intent was not to influence anyone. My
21 intent was to follow the directions of my supervisor.

22 BY MR. BUCKLEY:

23 Q. Well, what do you think the intentions of
24 your supervisor were?

25 A. I'm not going to go into --

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1 MR. HILL: Objection.

2 A. Yeah, I don't know what his intentions were.

3 BY MR. BUCKLEY:

4 Q. Did it occur to you that Judge Teske, by
5 trying to promulgate his version of events, was trying
6 to influence the testimony of witnesses?

7 A. No, it did not occur to me that --

8 Q. Okay. Well, now that you've thought about
9 it, does it now occur to you that he might have been
10 trying to influence the testimony of witnesses?

11 A. I don't know what he was trying to do --

12 Q. Okay.

13 A. -- with that, other than we routinely share
14 news articles of anything that has to do with our
15 court. That's sort of a common practice, which is --
16 this wasn't out of character with that.

17 Q. Let me show you Exhibit 35.

18 (Exhibit Number [P-35](#) was presented.)

19 BY MR. BUCKLEY:

20 Q. And perhaps you weren't in a position where
21 you would even know about this memorandum. If you
22 don't, you can say so. But it's dated October 23rd,
23 2008, to Gerald Bostock, Child Welfare coordinator,
24 from John P. Johnson III, director of Juvenile Court
25 Services. What position were you occupying at that

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1 point in time?

2 A. 2008, I would have been the JDAI
3 coordinator, I believe.

4 Q. And here he seems to -- he says, "It has
5 come to my attention in a conversation with the finance
6 department that there are some questions that need to
7 be answered, at least inhouse, so that the
8 administrator and judges are not being kept in the
9 dark. Since CASA is a court-sponsored program tied
10 directly to the judges, they have a right to know the
11 financial status. I have been made aware that there
12 are funds coming from the Superior Court Custody
13 Investigations and being placed into the CASA's bank
14 account."

15 Do you know what that's referring to there
16 at all, the Superior Court Custody Investigations?

17 A. That would -- that term had been used sort
18 of interchangeably with the GAL. It's referring to the
19 GAL --

20 Q. It's referring to --

21 A. -- program.

22 Q. -- the \$500 payment --

23 A. Yes.

24 Q. -- we've been talking about all day; right?

25 A. Yes.

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1 Q. Okay. "And being placed in CASA's" -- he
2 says, "I have been made aware there are funds coming
3 from the Superior Court Custody Investigations and
4 being placed in the CASA's bank account."

5 That activity, to your knowledge, had been
6 going on for some time; right?

7 A. Looks like --

8 Q. Well, at least --

9 A. -- less than a year.

10 Q. It says 2007; right?

11 A. Yeah.

12 Q. When the MOU was entered into?

13 A. Right.

14 Q. Okay. So he's just finding out that this is
15 occurring. He says, "I have consulted with Judge Teske
16 in regards to this matter with the discussion resulting
17 in this memo. Therefore, I am asking for financial
18 disclosure. One, is Ms. Gossett being paid in addition
19 to her county salary," I guess meaning is she being
20 paid by Friends of Clayton County CASA, do you know?

21 A. I don't know what he was -- the first time I
22 ever saw this --

23 Q. Okay.

24 A. -- was in relation to the lawsuit.

25 Q. So you saw this as you were gathering

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1 documents --

2 A. Right.

3 Q. -- for the lawsuit?

4 A. Right.

5 Q. Did you ask any questions of anybody about
6 it, what was this about?

7 A. The only person that would be there would be
8 Judge Teske. But, no, I didn't. I just turned it over
9 to our attorneys.

10 Q. Well, Johnson would know because Johnson's
11 still there.

12 A. But he -- no, he wasn't there when this
13 stuff started.

14 Q. Well, it says it's from Johnson to Bostock,
15 this memo.

16 A. Right. But Mr. Johnson -- when I saw this,
17 Mr. Johnson had retired. He was no longer at the
18 court.

19 Q. Okay. All right. When did Mr. Johnson
20 retire?

21 A. 2018, June, I believe it was, 2018. His
22 official -- that's when he left. His official
23 retirement I think was in August. He had leave that
24 he --

25 Q. Who is the new -- the new I guess court

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1 administrator? Well, you.

2 A. Yeah, I am.

3 Q. Okay. Sorry. Excuse me. Little brain
4 lapse there. It says, "Are you being paid by the
5 Friends of CASA or the advisory board?" Okay. To your
6 knowledge, Gerald was not being paid by the Friends of
7 Clayton County CASA?

8 A. No, I had no knowledge of that, no.

9 Q. Okay. It says, "Please submit a monthly
10 budget report to me containing all incoming and
11 outgoing funds due on the 5th of each month starting
12 November 5th, 2008."

13 And then it looks like, again, in -- so
14 that, did you start getting that report as soon as you
15 stepped into your position?

16 A. I don't recall when exactly I started
17 getting those reports.

18 Q. Okay.

19 A. I honestly don't remember if it's when I
20 stepped into the position or if it started sometime
21 after that sort of cursory glance at the MOU income
22 process. I don't remember when.

23 Q. When you were having conversations with
24 Mr. -- well, I'm sorry -- Judge Teske leading up to
25 Gerald's termination, did he discuss either with you or

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1 in your presence the fact that Clayton County --
2 Friends of Clayton County CASA funds were being spent
3 in gay bars?

4 A. Well, he probably said that.

5 Q. Okay.

6 A. In relation to the audit report.

7 Q. Okay. And then did he mention in your
8 presence or discuss in your presence the fact that
9 Friends of Clayton County CASA funds were being spent
10 to sponsor a gay softball team?

11 A. I don't remember gay softball team, that
12 language being used. I remember a reference to the
13 softball team.

14 Q. Between you and Johnson and Teske, during
15 the course of talking about the softball team and the
16 sponsorship of the softball team, was there any mention
17 of the fact that this was a gay softball team or that
18 this softball team was part of a gay softball league?

19 A. I don't recall there being any emphasis on
20 that. There - we obviously discussed the softball
21 league.

22 Q. Okay.

23 A. If -- the term gay could have been used, but
24 I don't remember there being --

25 Q. Okay.

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1 A. -- any major emphasis being placed on that
2 term or that fact.

3 Q. In the course of the events leading up to
4 Gerald's -- if you already testified about this, I'm
5 trying to recall if you remember being present when
6 Johnson recommended that Gerald be terminated or --

7 A. To Judge Teske?

8 Q. Correct.

9 A. Yes, I was there.

10 Q. You were there. And Johnson -- I just want
11 to make it clear. Johnson expressly recommended that
12 to Teske?

13 A. Yes, I believe so.

14 Q. Okay. And when he did, did Johnson cite to
15 any of these things we've been talking about, the
16 sponsorship of the softball team or the expenditure of
17 funds in gay bars or gay restaurants?

18 A. We went through the audit report and the
19 findings of the audit report.

20 Q. Okay. Same question though. Was there any
21 express mention by Johnson of the fact that funds were
22 being spent in gay bars?

23 A. I don't recall that.

24 Q. Okay. When you say you don't recall, you're
25 not saying it didn't happen. You --

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1 A. I don't recall. I don't remember --

2 Q. Okay.

3 A. -- the specifics of the conversation.

4 Q. Who is Shelley Johnson?

5 A. She was a CASA volunteer supervisor.

6 Q. Okay. And she was -- was she also a
7 member -- so she's a member of the court staff.

8 A. Correct.

9 Q. She's paid by the court.

10 A. Correct.

11 Q. And her job is to supervise the CASA
12 volunteers?

13 A. That's right.

14 Q. Is she the only CASA volunteer supervisor?

15 A. No, there were several.

16 Q. Okay.

17 A. I think five or six more, if I remember.

18 Q. Have you had much in the way of dealings
19 with Ms. Johnson, Shelley?

20 A. Have I had dealings with her?

21 Q. Yeah.

22 A. I mean, I've spoken to her, of course. She
23 was within my chain of command.

24 Q. I mean, have you worked on anything together
25 with her or has she reported to you or anything of that

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1 nature?

2 A. Not directly.

3 Q. Okay.

4 A. I mean, my interaction was more casual with
5 her.

6 Q. Okay. In your dealings with her, have you
7 found her to be credible?

8 A. Yeah.

9 Q. Okay. Her deposition has been taken in this
10 case, and she testified -- I'm going to read testimony
11 to you -- "Judge Teske called a meeting the day that
12 Gerald was terminated, and we all reported to the
13 common area where we usually have meetings and
14 functions. It was Judge Teske and Colin and John
15 Johnson."

16 Does that -- I had asked you earlier if you
17 were present at that meeting, and you couldn't quite
18 remember.

19 A. I -- I don't remember that meeting.

20 Q. Okay.

21 A. I don't.

22 Q. But not remembering it isn't the same as
23 saying I wasn't there.

24 A. That's right.

25 Q. Okay.

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1 A. But I don't remember -- I don't even
2 remember attending that meeting. I don't know if --

3 Q. If she said you were there, you're not in a
4 position to dispute that.

5 A. I'm not going to call her a liar, no.

6 Q. Okay. It says that "Judge Teske led the
7 meeting and basically told us that Gerald was
8 terminated because he misappropriated funds in
9 sponsoring the gay softball team and that the court
10 would not tolerate that type of behavior." That's her
11 testimony.

12 Did Judge Teske ever in your presence say
13 anything of that nature, to your recollection?

14 A. That in particular, I mean, he's mentioned
15 the softball team, and he may have mentioned that it
16 was part of a, you know, gay softball league. But --

17 Q. Okay.

18 A. -- that's -- you know.

19 Q. Okay. Do you recall that at or right after
20 this meeting that Richard Belcher, the reporter, was
21 present at the courthouse?

22 A. I know that he was there at some point. I
23 didn't see him --

24 Q. Okay.

25 A. -- or have any interaction with him, so I

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1 don't remember when that occurred.

2 Q. How do you happen to know that he was there?

3 A. Well, I mean, he did a news piece on it,
4 yeah.

5 Q. He interviewed Judge Teske; right?

6 A. Yeah. Yes, sir.

7 Q. So you saw the news report?

8 A. Yeah, I believe so.

9 Q. Do you recall Judge Teske telling the
10 employees that they were not to discuss the matter or
11 that they were to keep it confidential?

12 A. Like I said, I don't even remember being at
13 that meeting, so I don't --

14 Q. Okay. So you're not able to admit that or
15 deny that.

16 A. Right. I don't remember it.

17 Q. Did you talk to Judge Teske at all about the
18 case before you appeared for your deposition here
19 today?

20 A. To Judge Teske?

21 Q. Yes.

22 A. No.

23 Q. Did you talk to Mr. Johnson about the case
24 before appearing for your deposition here today?

25 A. I saw him at the 5K, and he asked me if I

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1 had been deposed yet. And at that time I don't even
2 think it had been scheduled, and I think I told him,
3 "No, but I think it's soon."

4 Q. Okay.

5 A. And that was the extent of the conversation.

6 Q. All right. You were aware early in your
7 relationship with Gerald that he's gay; right?

8 A. Yeah.

9 Q. Okay. Did he tell you, or you just heard
10 it, or do you even remember?

11 A. I don't remember. I know at one of the -- I
12 believe it might have been one of the Duck Derby events
13 I met his partner at the time. He intro -- Gerald
14 introduced me to him.

15 Q. Okay.

16 A. I don't remember when that was or --

17 Q. You've attended a number of CASA events over
18 the years; right?

19 A. Yes.

20 Q. Okay. Did you ever consume alcohol at any
21 of those events?

22 A. I believe the event at the Chili's that I
23 referenced earlier today.

24 Q. Uh-huh, yeah.

25 A. I believe I had a drink or two at that

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1 event.

2 Q. Do you remember who picked up the tab for
3 those drinks?

4 A. I paid for those drinks at the bar.

5 Q. You paid for them at the bar?

6 A. Yes.

7 Q. Do you recall an event where Judge Teske was
8 present, Gerald was present, you were present, and a
9 number of people had drinks and didn't pay for them and
10 Judge Teske told Gerald, "I'll pay half the tab,
11 Clayton County CASA can pay the other half or the
12 Friends of Clayton County CASA can pay the other half"?
13 Do you remember that?

14 A. I wasn't a party to that conversation. I
15 remember that it may -- I remember an event where
16 several people were drinking. In fact, I believe it
17 was that same event I was referring to at the Chili's.

18 Q. Okay.

19 A. But I don't remember that conversation.

20 Q. You don't remember specifically how other
21 people's drinks were paid for or whether Judge Teske
22 actually encouraged Gerald to pay for them with --

23 A. I don't know that.

24 Q. -- CASA funds?

25 A. No, I don't know that.

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1 Q. Okay. Were you ever a member of Friends of
2 Clayton County CASA?

3 A. A member?

4 Q. Yep.

5 A. No.

6 Q. Volunteer -- you wouldn't do that because
7 you're running the court; right?

8 A. Right.

9 Q. Okay. So once the clerk of court took
10 control of these \$500 payments into the court, did you
11 have any involvement with the specific use or
12 maintenance of the fund that those dollars were paid
13 into?

14 A. Direct involvement?

15 Q. Yes.

16 A. No, sir.

17 Q. Indirect?

18 A. Indirect in that my chief of staff approves
19 for those expenditures now. She's under me.

20 Q. Are they kept in a separate account, or are
21 they simply in the account of the clerk of court?

22 A. They're -- the funds are credited to a
23 separate line item within the court's -- we have a
24 single account.

25 Q. Okay.

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1 A. And it's done through the accounting
2 process.

3 Q. So there's a single account for the clerk's
4 office, but CASA-related funds paid into the account
5 are -- they're ledgered --

6 A. Yes.

7 Q. -- separately?

8 A. Yes.

9 Q. And --

10 A. There's a separate line item for that.

11 Q. Okay. So if I wanted to know the amount of
12 funds in that line item or anything about the
13 expenditure of those funds, then that line item, I
14 could do an open records request to your office, for
15 instance?

16 A. Yeah, in their records.

17 Q. Okay. Did you -- when you were supervising
18 and managing Gerald, did you all meet regularly?

19 A. I don't know that we had -- there was a
20 period of time where I had regularly scheduled staff
21 meetings with -- or supervisors meetings with all the
22 supervisors. But Gerald and I certainly met fairly
23 frequently. I mean, we -- you know, at least once or
24 twice a week we would have -- I would more of informal
25 stop by, "Hey, this is what's going on," that kind of

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1 stuff. That was fairly frequent, yes.

2 Q. Sometimes he'd stop by your office, and
3 sometimes you'd stop by his?

4 A. Right, right.

5 Q. Okay. Did you find your dealings with him
6 to be professional?

7 A. I never had an issue with Gerald. Gerald
8 and I, like I said before, there were times that we
9 might not agree on the approach to something, but those
10 conversations were always professional, and I didn't
11 have any problem getting along with Gerald.

12 Q. Have you ever talked to Black, Mr. Black,
13 Shawn Black, after he sent that email that we've
14 already looked at that's Exhibit 19?

15 A. I believe I ran into him some years
16 afterwards somewhere, but I've not had any kind of
17 in-depth conversation --

18 Q. Okay.

19 A. -- with him about anything.

20 Q. Who specifically commissioned the audit and
21 report with respect to Friends of Clayton County CASA?

22 A. Chairman Turner.

23 Q. Chair --

24 A. Chairman Jeff --

25 Q. Chairman Turner.

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1 A. -- Turner, the chairman of the Board of
2 Commissioners.

3 Q. Was this at somebody's request?

4 A. At -- yes, at John Johnson's request per the
5 instruction of Judge Teske.

6 Q. Chairman Turner did not have any input into
7 the decision to terminate Gerald, did he?

8 A. No, sir.

9 Q. Were you interviewed during the audit
10 process?

11 A. I talked to Stacey Merritt and Leslie --
12 well, Stacey Merritt at the beginning. I wasn't
13 interviewed per se.

14 Q. Okay. Do you remember the substance of that
15 conversation?

16 A. That's where we shared the concerns, John
17 and I, that we had about the GAL account expenditures.

18 Q. Well, when you say you shared your concerns,
19 was the basis of those concerns the Black email, or
20 what was the basis of those concerns at the point in
21 time you talked with her?

22 A. I think that was the prime -- primarily what
23 we shared was that these accusations have been made,
24 that we don't have access to or the ability to review
25 them ourselves.

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1 Q. Yep.

2 A. You're a professional auditor, can you look
3 at that.

4 Q. Okay. Let's look at that audit report. I
5 think you already have it in front of you --

6 A. Yeah.

7 Q. -- as Exhibit 10. Okay. We're not going to
8 go through every line of it, but I want to -- there
9 is -- it's not an overly long report. When you
10 received the audit report, were there any attachments
11 to it beyond what you see in Exhibit 10?

12 A. Not that I recall.

13 Q. Okay. So it starts with an introduction,
14 and it actually says, "In response to a request from
15 the Chief Juvenile Court Judge Steve Teske and a
16 directive from Chairman Turner, we have conducted an
17 audit." Okay. And then the objectives, it states the
18 statement of objectives is "to evaluate the internal
19 controls and procedures for receipting and
20 disbursement." Okay.

21 And they also looked at whether the funds
22 were used in accordance with established Friends of
23 Clayton County CASA bylaws and the memorandum of
24 understanding that we've all looked at here. It goes
25 on and has a statement of scope and methodology, a

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1 statement of auditing standards, and then background on
2 the Clayton County CASA program.

3 And I'm a little concerned here about
4 conflating Clayton County CASA with the Friends of
5 Clayton County CASA, Inc. Were they auditing Clayton
6 County CASA, or were they auditing Friends of Clayton
7 County CASA, Inc.?

8 A. Well, they were auditing the bank accounts
9 that belonged to Friends of Clayton County CASA.

10 Q. Right, that's what I thought.

11 A. Because at that time there weren't any
12 accounts --

13 Q. Okay.

14 A. -- associated with CASA itself.

15 Q. And it said the focus of the audit was
16 primarily the Guardian Ad Litem account, and it recites
17 that the account collects an administrative fee of \$500
18 per case as ordered by the Clayton County Superior
19 Court. I thought that the administrative fee
20 collection was ordered by the Clayton County Juvenile
21 Court.

22 A. No.

23 Q. Okay.

24 A. These are superior court cases.

25 Q. Okay. I thought you mentioned earlier that

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1 Judge Teske would order the payment of the \$500. No?

2 A. No, it would be a superior court judge.

3 Q. Okay. All right. So the first -- there's
4 observations and recommendations; right? And as we go
5 through those, the first thing they note in the first
6 section is "Clayton County CASA programs currently have
7 no written policies and procedures regarding specific
8 details of how the funds should be maintained. There's
9 also no specifics on what is acceptable under the
10 categories of volunteer recruitment, training, and
11 retention."

12 And then they make a recommendation on what
13 should be done there; right?

14 A. Right.

15 Q. Okay. By the way, the MOU, which is
16 Exhibit 3, you mentioned earlier that Gerald drafted
17 that document. Do you remember that testimony?

18 A. That's what I was told.

19 Q. Okay.

20 A. Right.

21 Q. And you were told that by who, Judge Teske?

22 A. I believe so, yes, sir.

23 Q. Okay. Are you aware that he actually did
24 not draft it, that there was somebody in his program
25 that drafted it and it was circulated widely among the

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1 court staff, including Judge Teske, for editing and
2 comment before it was finalized?

3 A. I don't know anything myself about how any
4 of that occurred. I was --

5 Q. Okay.

6 A. -- not involved in the court administration
7 at that point.

8 Q. Do you realize that or did you know that at
9 one point there was an initial draft that had, among
10 other people, Judge Teske as signatory, but Judge Teske
11 struck through that and was not a signatory upon his
12 request?

13 A. I didn't -- I don't know that.

14 Q. Okay. All right. So you have no -- when
15 you said that, you had no personal knowledge of who the
16 draftsman was.

17 A. No. I was relaying what I was told.

18 Q. Okay. So they make a recommendation of a
19 detailed SOP for internal cash controls. And that SOP,
20 to your knowledge, had not ever been drafted; right?

21 A. Has not?

22 Q. Had not.

23 A. Oh, not at that time.

24 Q. At that time. And is it -- it's not your
25 testimony either that Gerald Bostock was personally

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1 responsible for drafting those SOPs?

2 A. It was under his purview to make sure
3 controls were in place.

4 Q. Well, let me ask the question. Was he, to
5 your knowledge, charged by anyone with drafting the
6 SOPs for the handling of these monies?

7 A. Not to my knowledge.

8 Q. Okay.

9 A. I'm basing my answer off of --

10 Q. Okay.

11 A. -- the assumption that a reasonable person
12 that has control of lots of money would have policies
13 and procedures and controls in place so that there
14 could not even be the appearance of wrongdoing.

15 Q. And do you know whether he had discussions
16 with the Friends of Clayton County CASA board and board
17 members specifically about how those monies should be
18 handled and what were proper expenditures?

19 A. I don't know.

20 Q. If he did, then there may have been policies
21 and procedures. You might not have liked them, but
22 there may have been policies and procedures in place
23 that you weren't aware of.

24 A. Right. I never saw anything in writing --

25 Q. Okay.

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1 A. -- that listed how things were --

2 Q. All right.

3 A. -- supposed to be handled.

4 Q. Okay. So --

5 A. Well, let me clarify that.

6 Q. Go ahead.

7 A. The only thing I ever saw in writing that
8 had anything at all to do with how the funds were to be
9 handled were -- was in the bylaws, as I mentioned
10 before, where it talks about --

11 Q. Okay.

12 A. -- the president's supposed to sign off on
13 expenditures -- or the chairperson, I'm sorry. And if
14 it were over \$500, I believe the chairperson and the
15 treasurer were supposed to sign off on it.

16 Q. Do you have any knowledge as to whether that
17 -- whether or not that practice was followed?

18 A. I don't.

19 Q. Okay. And I'm not saying you should.

20 A. Yeah, yeah, I don't --

21 Q. But I just want to be sure you're not about
22 to testify, "Oh, that policy in the bylaws was not
23 followed."

24 A. No. I was just clarifying that's the only
25 thing I've ever seen, because I just said I never saw

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1 anything in writing, but --

2 Q. Okay.

3 A. -- I wanted to make sure that that wasn't --
4 that that's the only thing I'd ever seen in writing.

5 Q. Okay. So they recommend then that the funds
6 be paid through the office of the Clerk of the Juvenile
7 Court. And they go on to say here, "the Child Welfare
8 Service coordinator's activity with the funds is a
9 direct violation of separation of duties."

10 Okay. Do you happen to know as a -- you're
11 not an accountant; right?

12 A. I am not.

13 Q. Do you know what that accounting term means,
14 separation of duties?

15 A. I have a general understanding that it means
16 that the person that receives money is not the person
17 that records the receipt of the money and is not the
18 person that signs off on the disbursement --

19 Q. Okay.

20 A. -- of that money. I've been involved in
21 multiple organizations where we have a treasurer, and
22 those practices are very commonplace.

23 Q. Okay. So it says here that there's a
24 violation of separation of duties saying, "Ideally,
25 there should be one or a limited number of employees

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1 who are authorized to process disbursements, separated
2 by a person designated to make deposits."

3 And that sounds like probably a good
4 accounting practice. You're not suggesting that
5 because Gerald was not aware of this particular
6 accounting practice that he was engaging in some
7 wrongdoing just because of his lack of awareness?

8 A. No, I'm not suggesting that.

9 Q. Okay. So let's go on and see what else they
10 say here. They say, "The Child Welfare Services
11 coordinator has discretionary spending authority over
12 the GAL account." And they recite that the payments
13 need to be made to Friends of Clayton County CASA in
14 the care of the coordinator's name and "expenditures
15 over \$500 must include two signatures, which may also
16 include one of the CASA advisory board members." And
17 then they recite that he "has two debit/credit cards
18 imprinted with his name, one each for Friends of
19 Clayton County CASA, Inc., and Friends of Clayton
20 County CASA d/b/a Guardian Ad Litem accounts."

21 Are you sure that he actually had two debit
22 cards?

23 A. I only personally ever saw one.

24 Q. Okay.

25 A. Yeah.

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1 Q. If he said he only had one, you wouldn't
2 really take issue with that, would you?

3 A. It's the only one I knew existed.

4 Q. Okay. All right. So they go on to say that
5 "there is very little oversight concerning the
6 day-to-day and weekly expenditures made from the
7 account." And they recommend -- their next
8 recommendation is "initiation of monthly reports which
9 list the details of the expenditures and how they align
10 with the mission of funding volunteer recruitment,
11 training, and retention."

12 Okay. And it says, "Although the Child
13 Welfare Services coordinator serves as liaison between
14 the CASA program and the courts, it's not best practice
15 for one person to have sole authority over court
16 ordered fees without any oversight."

17 Okay. So they're not saying he's done
18 anything wrong here, but what they're saying is these
19 reports need to be more specific in what they say about
20 whether or not funds are being properly spent on
21 recruitment -- volunteer recruitment, training, or
22 retention; right?

23 A. Correct.

24 Q. Okay. So then it -- they do have a section
25 captioned Guardian Ad Litem-Bank Statement

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1 Transactions. And they talk about the total amount of
2 administrative fees deposited in the GAL account from
3 February 2011 to April 2011 is \$14,853.28. And the
4 total amount of funds expensed during the same period
5 is \$12,294.17. It sounds to me, reading that, they're
6 not suggesting that more is being spent than is being
7 taken in. It sounds like the opposite, right, that
8 only funds that have been taken in are being spent?

9 A. Yes, that's what it would appear, yes.

10 Q. Okay. And then they do a breakdown of
11 various categories of expenditures that have been made,
12 and they say at the bottom, "The category of
13 recruitment, training, and retention include various
14 CASA-related lunch and dinner meetings at restaurants
15 and bars. The following pie charts compare approximate
16 percentages of these charges as related to meals,
17 alcohol, and training."

18 Now, I find that an odd way to say that, and
19 maybe I'm misunderstanding them or maybe it's a typo.
20 It says "the category of" -- "the following pie charts
21 compare approximate percentages of these charges as
22 related to meals, alcohol, and training."

23 Now, the purpose of the expenditure of the
24 funds is supposed to be recruitment, training, and
25 retention. So I find that breakdown, meals, alcohol,

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1 and training, to be odd because, whether or not you
2 like alcohol being purchased, the meals and alcohol
3 could be part of a training expenditure or a retention
4 expenditure or a recruiting expenditure. True?

5 A. Potentially, depending on the context.

6 Q. Okay. So I just found that the way that
7 they say that to be odd. So they then have these pie
8 charts, and it looks like they're showing three time
9 frames, 2013, 2012, and 2011. And they're breaking
10 down meals and entertainment, sponsorships, and
11 alcoholic beverages, as well as professional
12 association fees. It looks like in 2013 -- what is the
13 Sponsorships (HSL)? What is that expenditure of funds?
14 What is that for? I don't understand that. Do you
15 know what that means?

16 A. It is --

17 Q. This is money going out for sponsorships?

18 A. That's what I assume. I think the HSL is --
19 yeah, is referring to the Hot Atlanta Softball
20 League -- or Hotlanta Softball League.

21 Q. I'm not sure.

22 A. Well, on the next page they use the, you
23 know, initials HSL to refer to that. So I don't know.
24 I'm assuming that's what they're --

25 Q. Okay. So they're saying 40 percent of funds

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1 in 2013 were spent on the Hotlanta Softball League? Is
2 that what that means? That doesn't sound right.

3 A. That's what it appears to me, but I --

4 Q. Okay.

5 A. I didn't write the report, so I'm not sure.

6 Q. All right. Meals and entertainment, and
7 then 3 percent for alcohol. 2012, looks like nothing
8 for alcohol, 2 percent for professional association
9 fees, and then the rest, 98 percent, for meals and
10 entertainment. And then in 2011, a hundred percent for
11 meals and entertainment.

12 And they say, "Many of the audited receipts
13 were for restaurants and bars, many of which were
14 located outside the Clayton County area...Also, there
15 was evidence of GAL funds being expensed on alcoholic
16 beverages at restaurants, bars, and package stores."

17 And then they make a recommendation about
18 there being checks and balances to prevent the misuse
19 of funds and "strict guidelines regarding meals and
20 entertainment should be initiated and enforced by any
21 and all managing parties, especially disbursements
22 concerning alcohol?"

23 So, to be clear, they're not saying that
24 expenditures concerning alcohol are improper, but they
25 are saying that there should be strict guidelines on

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1 how and when funds are expended on such; right?

2 A. I would take that, right.

3 Q. Okay. And then they seem to highlight that
4 "the GAL bank statement...included a payment to Birch
5 Communications for monthly phone expenses at the CASA
6 office" and that this was a common expenditure and they
7 recommend that for office communication expenses that
8 they not be paid from the GAL account, that it doesn't
9 align with the mission of volunteer recruitment,
10 training, and retention.

11 Do you know if Gerald was in charge of that
12 expenditure or if somebody else was?

13 A. I don't -- I don't know.

14 Q. Okay. Was this a separate office separate
15 from -- a separate office separate from the courthouse,
16 do you know?

17 A. There was a separate office for a period of
18 time when we were housed in the historic courthouse --
19 or the annex behind the historic courthouse.

20 Q. Right.

21 A. Yeah, there was a separate --

22 Q. A separate CASA office?

23 A. -- space, yes.

24 Q. Okay. And whether or not the phone
25 expenses, the phones, if you will, are being used for

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1 recruitment, training, and retention, you don't know?

2 A. I have no idea what they were.

3 Q. Okay. All right. But they --

4 A. I don't know why there were separate phones
5 in February -- well, oh, no, wait a minute. Was it
6 February? Yeah. Never mind.

7 Q. They're saying February 2012.

8 A. Yeah. No, I thought it was February 2013.
9 That would seem odd to me because we had moved into the
10 new courthouse by then.

11 Q. Okay. So was the CASA office in the
12 courthouse after you moved into the new courthouse?

13 A. When we moved into the new courthouse,
14 every -- we had space for everybody that worked in
15 CASA. What had happened at some point, the program had
16 grown to the point that we didn't have space and --

17 Q. In the courthouse?

18 A. Right. And we were in the process of the
19 new courthouse being built, so --

20 Q. Okay.

21 A. -- they had to find some temporary space.

22 Q. If the board -- I'm sorry. If the phone
23 expenses were approved by the Friends of Clayton County
24 CASA board -- well, you don't know whether they were or
25 they weren't?

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1 A. I don't.

2 Q. Okay.

3 A. I think the issue was that they were being
4 taken from the GAL fund and not being funded --

5 Q. Okay.

6 A. -- through the other account.

7 Q. But if that were the case and if Gerald was
8 reporting to the board and they authorized that, you
9 can't take issue with that; right?

10 A. I take issue with it being used -- being
11 paid from the GAL account, yes.

12 Q. Well, I understand you might. But you don't
13 know what the --

14 A. I don't know what the board approved, no.

15 Q. And what the purpose of the phones was, for
16 that matter, whether the phones were used in
17 recruitment and training and whatnot. You don't really
18 know; right?

19 A. I don't know --

20 Q. Or retention.

21 A. -- why that was done, right.

22 Q. Okay. So let's go on. So it mentions, "On
23 the bank statement dated January 2013, a \$500 donation
24 for the ABC Christmas luncheon was deposited into the
25 GAL account."

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1 Now, if it's the GAL account, would a
2 donation for a Christmas luncheon, should that go in
3 the GAL account?

4 A. In my opinion, that should go in the ABC
5 account.

6 Q. Okay.

7 A. This was an ABC function, so --

8 Q. Okay.

9 A. -- that confused me from the get-go.

10 Q. But if somebody made a donation to Friends
11 of Clayton County CASA for the GAL account, would it be
12 improper to deposit those funds in --

13 A. Well --

14 Q. -- a different account?

15 A. -- people shouldn't be making donations to
16 the GAL account, period. That's not what that account
17 was set up for.

18 Q. But isn't the GAL account -- I think by your
19 testimony earlier, that is a 501(c)(3) account; right?

20 A. It's held in that, but that account was
21 supposed to be kept separate for only the court
22 generated fees.

23 Q. Okay.

24 A. All the other funds that Friends of Clayton
25 County CASA collected would go to their general

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1 account. Where if it --

2 Q. Okay.

3 A. -- were like this, a donation for ABC, ABC
4 had an account. It seems like it would have probably
5 been more appropriate there.

6 Q. Okay. Then it says, "the Child Welfare
7 Services coordinator wrote himself a reimbursement
8 check for the same luncheon for \$428.41. There was no
9 documentation or receipts provided to support the
10 reimbursement."

11 Okay. Do you know whether Gerald got
12 authorization from the board for reimbursement of that
13 sum of money for that expenditure?

14 A. Have no idea.

15 Q. Okay. And do you know if one of the
16 problems that they -- as they were going along that
17 they had was that he had to keep spending his own money
18 on CASA-related matters and then getting reimbursement
19 and that that's why they finally issued him a debit
20 card?

21 A. That may be. I don't have any personal
22 knowledge --

23 Q. And you're not --

24 A. -- of that.

25 Q. -- suggesting that if that had occurred that

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1 there's anything improper in that, are you?

2 A. I think writing yourself a check and signing
3 it, that -- that's not best practice, for sure.

4 Q. It may not be best practice, but if it's
5 approved by the board -- and I think, you know, we've
6 already talked about the board needed to approve these
7 things --

8 A. Well, as a court employee, one of our
9 policies states that you have the duty to avoid not
10 only improper behavior but the appearance of
11 impropriety. And writing yourself a check from a
12 charitable checkbook, you know, organization's
13 checkbook, that's --

14 Q. I think you're --

15 A. That crosses the line for me.

16 Q. Well, it may cross the line for you. But
17 you know what? There's not a darn thing in the MOU
18 about it, and there's not a darn thing in the Friends
19 of Clayton County CASA bylaws about it. And he's a guy
20 who's spending his own money on CASA-related events and
21 asking permission to basically get reimbursed.

22 A. I guess, but there's no documentation to --

23 MR. HILL: Let him ask his question.

24 THE WITNESS: Okay.

25 / / /

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1 BY MR. BUCKLEY:

2 Q. All right. But you guess, and that's the
3 problem I have is you didn't investigate to see, for
4 example, whether or not that reimbursement was, in
5 fact, authorized, did you? Did you ask -- did you ask
6 the chair, the board chair in that meeting if --

7 A. I didn't do the investigation.

8 Q. Okay. All right. Okay. And it said that
9 the "bank statement dated April 2013 included another
10 check written by the Child Welfare Services coordinator
11 to himself in the amount of \$82.57 for reimbursement
12 for an AT&T sponsor dinner meeting."

13 Is that the AT&T employee sponsor that
14 you're talking about?

15 A. I don't -- I don't know for sure.

16 Q. Did you know that Gerald was working with
17 that guy to recruit AT&T employees as volunteers for
18 Friends of Clayton County CASA?

19 A. I didn't know anything about that until --

20 Q. Okay.

21 A. -- I got this -- these -- you know, the
22 report and this stuff. I do believe I read that in --

23 Q. Okay.

24 A. -- his response.

25 Q. Okay. Do you know whether Gerald was ever

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1 trained in generally accepted accounting principles?

2 A. I don't know if he was or not.

3 Q. You don't know if he was trained -- if he
4 has accounting training at all; right?

5 A. I have no idea.

6 Q. And you're not trained in generally accepted
7 accounting principles.

8 A. Well, I've had lots of classes on budgeting
9 and finance and best practices and that --

10 Q. I get that.

11 A. Yeah.

12 Q. You may have had the benefit of more
13 training than Gerald's had with that respect; right?

14 A. Perhaps. I don't know.

15 Q. All right. But you're not specifically
16 trained on generally accepted accounting principles,
17 what they are and what they are not.

18 A. I'm not an accountant. I've had entire
19 courses in financial management that do go through
20 there. I wouldn't consider myself an expert, no.

21 Q. And so when you're talking about, quote,
22 crossing a line, for instance, as you just -- you're
23 talking about that based on the specialized training
24 that you have received and that he, in all likelihood,
25 has not received; right?

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1 A. Well, I found myself years and years ago the
2 treasurer of my daughter's swim team, and this was
3 before I was in court administration. And, you know, I
4 knew that it would not be good to write myself a check
5 on the team's checking account in a very similar
6 situation that Mr. Bostock seems to have found himself
7 where we're buying stuff, you know, on our own dime and
8 having to wait for the reimbursement. I immediately
9 set that up so that there were two signatories on that
10 account, myself and the president of the club.

11 Q. Okay.

12 A. And she would sign any reimbursements to me,
13 not me.

14 Q. Well, I think that's terrific that you were
15 a good steward to your daughter's swim team, but I
16 don't --

17 A. Thank you.

18 Q. -- know that that's necessarily the standard
19 that we're talking about here. You don't know whether
20 he was ever trained in generally accepted accounting
21 principles.

22 A. All I'm saying is it seems kind of common
23 sense.

24 Q. All right. So -- but the question is if he
25 has check writing authority and if the board gives him

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1 authority to write that check, regardless of whether
2 you think it looks good, there's nothing morally wrong
3 or illegal about him doing so.

4 A. Well, you have bylaws that prescribe how
5 payments are supposed to be handled.

6 Q. Right.

7 A. And I've never seen anything that says he
8 has that authority.

9 Q. Did you see anything in the -- if he gets
10 the authority from the board, then he has the
11 authority.

12 A. But where in writing is that authority?
13 I've never seen that. That's what I'm saying.

14 Q. Isn't that up to the board to make a record
15 of that, not up to Gerald?

16 A. It would be up to the board, but Gerald
17 should be able to produce it.

18 Q. Right. Well, if the board made that record;
19 right?

20 A. If they made that record. And if they
21 didn't make that record, then all we have to go on is
22 the bylaws, which prescribe a different method.

23 Q. Then part -- and, in fact, most of this
24 audit, what most of this audit concluded was not that
25 there was per se wrongdoing by Gerald but that controls

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1 on the funds and how they were -- not only how they
2 were spent but how they were documented needed to be
3 tightened up; right? That was most of what this audit
4 was about; right?

5 MR. HILL: Object to form, mischaracterizing
6 the evidence.

7 MR. BUCKLEY: That's not mischaracterizing
8 the evidence. This man just said he has common
9 sense.

10 BY MR. BUCKLEY:

11 Q. Most of this report was how they needed to
12 tighten up controls and they needed to have written
13 guidelines; right?

14 A. I would say that's a part of the report.

15 Q. Okay.

16 A. I don't know that I would say it was most.
17 I would say that there was much concern expressed about
18 missing records, the reimbursements, how money was
19 spent, and the image that it portrayed or left open to
20 someone --

21 Q. Okay.

22 A. -- to assume.

23 Q. And of course -- I'm on page 6 now. Are you
24 there?

25 A. Yes, sir.

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1 Q. Okay. Bottom half page 6, this is where
2 they get into the Hotlanta Softball League. Okay. And
3 it says, "The Child Welfare Services coordinator has
4 sponsored an adult softball team, of which he is a
5 member, using funds from the CASA GAL account. The
6 softball team is part of the Hotlanta Softball League
7 out of the city of Atlanta. The coordinator stated he
8 had spoken to two advisory board members and received
9 authorization and support of this expenditure."

10 Do you have any reason to doubt that that is
11 true?

12 A. No.

13 Q. Okay. And you're not here to call Gerald
14 Bostock a liar today, are you?

15 A. No, sir.

16 Q. Okay. So it said, "According to the
17 coordinator, the purpose of the sponsorship is to raise
18 awareness to the CASA program. Part of the expenses
19 incurred with this sponsorship included a reception
20 held in Birmingham, Alabama, that was paid for out of
21 the GAL funds."

22 Now, did you -- you've made a lot about
23 that, the reception. And you know that the ball club
24 competed in a tournament that was in Birmingham, that
25 the Hotlanta team that's from Atlanta went over to

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1 Birmingham to compete in a larger tournament, in this
2 case softball league. You're generally aware of that;
3 right?

4 A. That's what I understood happened, yes.

5 Q. Okay. Were you aware -- one second. Who is
6 Guy Alexander?

7 A. I know the name, but I'm not sure what his
8 association with this is.

9 Q. Was he a board member that had an alcohol
10 distribution company, CASA board member?

11 A. I don't know.

12 Q. Okay. Were you aware that -- even if you're
13 not aware of what he did for a living, were you aware
14 that Mr. Alexander was on the Friends of Clayton County
15 CASA board?

16 A. Like I said, the name sounds familiar. I
17 know he's somehow associated with that, but I can't say
18 for sure he was a --

19 Q. Were you aware --

20 A. -- board member.

21 Q. -- that he expressly authorized the
22 expenditure for this party after the -- party for the
23 team after the tournament or during the tournament and
24 the payment of funds for food and drink for that event?

25 A. I don't know anything about all that.

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1 Q. Okay. All right. So -- and they give an
2 opinion here, the auditors. "In our opinion" -- "It is
3 our opinion that sports league sponsorships do not fall
4 within the current intentions of the GAL account.
5 However, if the chief judges decide this type of
6 expenditure is acceptable, details should be included
7 in the MOU."

8 And then they recommend further that "any
9 CASA-sponsored sports leagues be based in Clayton
10 County" and "recommend the SOP require official written
11 requests and authorization for all sponsorships and
12 strict guidelines."

13 They express an opinion, Well, we don't
14 think sports teams should be sponsored with CASA funds.
15 But if the purpose of the sponsorship was recruitment
16 of volunteers for the program, that at least would fall
17 within the parameters of the original MOU, wouldn't it?

18 A. Yeah.

19 Q. Okay. And Gerald actually I think in the
20 questionnaire told you all that there were some people
21 that were recruited as a result of that and I think
22 that he was still trying to recruit. He let you know
23 that; right?

24 A. I believe there were three individuals he
25 mentioned.

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1 Q. I don't know the specific number. There
2 were a number --

3 A. Yeah.

4 Q. -- though anyway. Now, these volunteers,
5 and especially the guardian ad litem, there's a lot of
6 man and woman hours that go into -- they're volunteer
7 hours but are in the Guardian Ad Litem program; right?

8 A. There can be, yes, depending --

9 Q. Probably what?

10 A. -- on the case.

11 Q. How many do you think a year? Any idea at
12 all?

13 A. Per volunteer?

14 Q. No, all together for the court.

15 A. Well, I know last fiscal year, even with the
16 pandemic, there were over 1,200 hours.

17 Q. Okay. 1,200 hours.

18 A. Spread across all of our volunteers.

19 Q. Okay. And if you were to pay those folks by
20 the hour to do the work that they were doing, let's say
21 \$25 an hour, that would far exceed the Friends of
22 Clayton County CASA budget bank account, whatever --

23 A. Absolutely, yeah.

24 Q. Yeah. And these are people that are trained
25 in a very specialized and sensitive area; right?

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1 A. They are, yeah.

2 Q. You've got to -- you know, representing
3 these kids is a very sensitive and refined job. And so
4 the funds spent on recruiting can be well spent funds
5 that if you were to pay these folks, I mean, you're
6 getting more bang for your buck by recruiting
7 volunteers than by hiring staff and paying people to do
8 this job; right?

9 A. Well, right. And that's how the program's
10 structured expressly for -- there's no CASA program --
11 we're actually having paid staff on the CASA program
12 within the court is an oddity in this state. Most
13 programs are just nonprofits.

14 Q. Okay. And when -- we can get into, you
15 know, your differences of opinion on should these funds
16 have been spent this way or not. But overall, under
17 Gerald's stewardship, the GAL program was a success.

18 A. Yeah, we met the need of the superior court.

19 Q. It was one of the largest programs in the
20 state, if not the largest, wasn't it, of its kind?

21 A. The CASA program?

22 Q. Yes.

23 A. Oh, yeah. Yes.

24 Q. In fact, it's one of the larger programs in
25 the country, of its kind?

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1 A. It was, yes.

2 Q. Okay. And I'm not saying that size is a
3 determination of success, but it worked well. Children
4 were well represented by these guardian ad litem,
5 generally speaking; is that fair?

6 A. Generally speaking, yes, sir.

7 Q. Okay. And these guardian ad litem were
8 well trained and performed their jobs, probably with a
9 few exceptions, but for the most part performed their
10 jobs well.

11 A. Yeah. I mean, we had an occasional one we
12 would have to dismiss, but --

13 Q. Right.

14 A. -- yes. No, the judges were always very
15 happy with --

16 Q. When you have a lot of people doing a job,
17 you're occasionally going to have --

18 A. Sure.

19 Q. -- an outlier; right?

20 A. Sure.

21 Q. Okay. But on the whole, generally speaking,
22 it was a successful --

23 A. Yeah, it was.

24 Q. -- program, and it was performed well by
25 these volunteers.

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1 A. Yeah.

2 Q. That fell under Gerald's stewardship.

3 A. Sure.

4 Q. Okay. So, in any event, concluding this
5 report, they have a conclusion, a little short
6 conclusion. And they do not, in their conclusion, find
7 wrongdoing by Gerald, do they?

8 A. Not directly, no.

9 Q. Okay. What they say is, "The accounting
10 controls concerning the CASA program funds are
11 relatively nonexistent, lack structure, and leave room
12 for inconsistencies surrounding the cash reporting and
13 documentation process. Lack of oversight to these
14 accounts, particularly the Guardian Ad Litem account,
15 will increase risk and could result in loss of
16 credibility to a program that has an outstanding
17 reputation across Clayton County and the state."

18 That was their conclusion; right? No word
19 about Gerald Bostock or he stole money or he improperly
20 spent funds or anything of that kind. That's not what
21 they say in here; right?

22 A. That's not what they say.

23 Q. Okay. So you were not involved in
24 contacting Richard Belcher on the day that Gerald's
25 termination was announced or getting him down to the

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1 courthouse or anything of that nature?

2 A. No, sir.

3 Q. Okay. And you don't know who contacted him
4 or whether he contacted you all? You don't know?

5 A. I have no knowledge of it.

6 Q. Okay. Are you on social media?

7 A. Am I on social media?

8 Q. Yep.

9 A. I have social media accounts that I don't do
10 anything -- haven't done anything with in over two
11 years, maybe longer.

12 Q. What are your social media accounts?

13 A. I have Facebook and Instagram, LinkedIn.
14 That's all.

15 Q. Facebook, Instagram, LinkedIn. So you post
16 comments about whatever you want to on these -- or you
17 did.

18 A. I have in the past. I haven't posted
19 anything other than maybe an occasional vacation
20 picture or something in the last couple of years.

21 Q. Okay. Will you agree with me that after
22 this deposition you will not make any changes or any
23 deletions in any of those accounts?

24 A. Sure.

25 MR. BUCKLEY: Okay. All right. Let's take

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1 a little break. I'm deeply saddened to say we may
2 be close to being done here today.

3 THE WITNESS: Okay.

4 THE VIDEOGRAPHER: We're off the record.

5 (VIDEO CAMERA OFF.)

6 (A brief recess was taken.)

7 (VIDEO CAMERA ON.)

8 THE VIDEOGRAPHER: We're back on the record.

9 MR. BUCKLEY: You ready?

10 MR. HILL: We're ready.

11 BY MR. BUCKLEY:

12 Q. All right. Mr. Slay, we've taken a couple
13 of breaks. Is there any testimony you've given so far
14 today that you need to correct or clarify?

15 A. Not that I can think of, no, sir.

16 Q. Okay. And you understand you've been under
17 oath the entire day?

18 A. Yes, sir.

19 Q. All right. Now, I have a couple more
20 questions. I want to draw your attention back to
21 Exhibit 10, which you have in front of you. Go to page
22 5 of that document, please. Do you see the pie chart
23 there?

24 A. Yes, sir.

25 Q. You're looking at that?

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1 A. The three, yeah.

2 Q. Yeah. And you see the pie chart on the top
3 left-hand side for 2013 recruitment, training, and
4 retention; right?

5 A. Yes, sir.

6 Q. It shows 40 percent Sponsorships (HSL). Do
7 you see that?

8 A. Yes, sir.

9 Q. Do you know that that 40 percent there --
10 now, this is in -- this would have been -- this report
11 was generated in May of 2013; right?

12 A. Right.

13 Q. So this is not for a full year of
14 expenditures; right?

15 A. Right.

16 Q. It's only for a portion of the year.

17 A. Yeah.

18 Q. Do you understand that this 40 percent that
19 they are putting on the Hotlanta Softball League
20 sponsorship represents only \$250?

21 A. I don't know what the cost of the
22 sponsorship was.

23 Q. Okay. If I told you to assume for the sake
24 of your answer that that only represents \$250, you have
25 no reason to dispute that as you sit here today.

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1 A. No, sir.

2 Q. Okay. And the entire pie chart actually
3 represents less than a thousand dollars in
4 expenditures. If I told you that, you have no reason
5 to dispute that either; right?

6 A. Less than a thousand?

7 Q. Right, less than a thousand.

8 A. Well, according to the chart on the page
9 before, it's \$1,026.22.

10 Q. Okay. 1,026.22.

11 A. If that's -- if I'm reading that correctly.

12 Q. Okay. So are you aware now that the CASA
13 logo, Clayton County CASA logo, was on the team jerseys
14 and also that there was a banner that was displayed at
15 the ball field for Clayton County CASA?

16 A. I believe that's what Mr. Bostock said.

17 Q. Right. And that -- and he did say his
18 purpose was to promote the program and to promote
19 recruiting and commitments for the program.

20 A. That's what he said, yes.

21 Q. Okay. And did he tell you or did you ever
22 hear that he had obtained through that program \$3,000
23 in commitments for the Duck Derby?

24 A. I believe I remember reading something to
25 that effect in his response, but --

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1 Q. Okay.

2 A. -- other than that, no.

3 Q. And with respect to the display of the logo
4 on the banner and on the shirts, are you aware that the
5 people who attended these games, there was 1- to 2,000
6 people who actually saw the logo and saw the banner?

7 A. If you say so. I don't know how many people
8 attended.

9 MR. BUCKLEY: All right. Good. All right.
10 That is all the questions I have of this witness.

11 THE WITNESS: Okay.

12 MR. HILL: We do not have any questions.

13 MR. BUCKLEY: All right. Good. All right.
14 We'll be seeing you all again soon.

15 THE VIDEOGRAPHER: 5:59 p.m., we're off the
16 record.

17 (VIDEO CAMERA OFF.)

18 MR. HILL: We'll do the read and sign, which
19 means, when the transcript comes out, I'll send
20 you the copy. You read it, make sure everything
21 is correct and accurately reflects your testimony.

22 THE WITNESS: Okay. All right.

23 (Deposition concluded at 6:02 p.m.)

24 - - -

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E R R A T A S H E E T

Pursuant to Rule 30(e) of the Federal Rules of Civil Procedure and/or O.C.G.A. 9-11-30(e), any changes in form or substance which you desire to make to your deposition testimony shall be entered upon the deposition with a statement of the reasons given for making them.

To assist you in making any such corrections, please use the form below. If supplemental or additional pages are necessary, please furnish same and attach them to this errata sheet.

- - -

I, the undersigned, COLIN SLAY, hereby certify that I have read the foregoing deposition and that said transcript is true and accurate, with the exception of the following changes noted below, if any:

Page_____/Line_____/Should Read:_____

Reason:_____

Page_____/Line_____/Should Read:_____

Reason:_____

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Reason:_____

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1 Page ____/Line ____/Should Read:_____

2 _____

3 Reason:_____

4 _____

5 Page ____/Line ____/Should Read:_____

6 _____

7 Reason:_____

8 _____

9 Page ____/Line ____/Should Read:_____

10 _____

11 Reason:_____

12 _____

13 Page ____/Line ____/Should Read:_____

14 _____

15 Reason:_____

16 _____

17 Page ____/Line ____/Should Read:_____

18 _____

19 Reason:_____

20 _____

21 _____
COLIN SLAY,

22 Sworn to and subscribed before me,

23 _____, Notary Public.

24 This _____ day of _____ 2021.

25 My Commission Expires:_____.

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C E R T I F I C A T E

STATE OF GEORGIA:

PAULDING 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 and that the foregoing pages 1 through 274 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 anyway interested in the result of said case. The witness did reserve the right to read and sign the transcript.

This, the 4th day of October 2021.



CYNTHIA B. GATEWOOD, CCR-B-1400

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DISCLOSURE

STATE OF GEORGIA:
COUNTY OF PAULDING:

Deposition of COLIN SLAY

Pursuant to Article 10.B of the Rules and Regulations of the Board of Court Reporting of the Judicial Council of Georgia, I make the following disclosure:

I am a Georgia Certified Court Reporter. I am here as a representative of Regency-Brentano, Inc.

I am not disqualified for a relationship of interest under the provisions of O.C.G.A. §9-11-28[©].

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CYNTHIA B. GATEWOOD, CCR-B-1400
Date: October 4, 2021

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