

**In the Matter Of:**

**BOSTOCK V. CLAYTON COUNTY**

1:16-CV-01460-ELR-WEJ

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**GERALD BOSTOCK**

*October 14, 2021*

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GERALD BOSTOCK  
BOSTOCK V. CLAYTON COUNTY

October 14, 2021

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

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

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

Stephen Mahoney, CVR, CCR  
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APPEARANCES

ON BEHALF OF THE PLAINTIFF:

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ALSO PRESENT:  
ERIC LUCAS, VIDEOGRAPHER

TRANSCRIPT LEGEND

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

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P R O C E E D I N G S

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

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

10 MR. HILL: Michael Hill for the Defendant.

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

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

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

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

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

24 THE WITNESS: I do.

25 MR. HILL: Okay.

GERALD BOSTOCK  
BOSTOCK V. CLAYTON COUNTY

October 14, 2021

5

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

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

11           Good morning, Mr. Bostock.

12           THE WITNESS: Good morning.

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

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

22           MR. HILL: Sure.

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

25           THE WITNESS: No.

GERALD BOSTOCK  
BOSTOCK V. CLAYTON COUNTY

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6

1 MR. HILL: Okay.

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

7 THE WITNESS: I do.

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

11 THE WITNESS: Yes.

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

15 THE WITNESS: Yes.

16 MR. HILL: Okay.

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

20 THE WITNESS: Yes.

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

23 THE WITNESS: Yes.

24 MR. HILL: Okay.

25 And you understand that the oath that you

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

6 THE WITNESS: I do.

7 MR. HILL: Okay.

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

11 THE WITNESS: No.

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

15 THE WITNESS: No.

16 MR. HILL: Okay.

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

19 THE WITNESS: Yes.

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

24 A. Yes.

25



CROSS-EXAMINATION

BY MR. HILL:

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

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

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

A. No.

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

A. I did.

Q. What did you review?

A. The productions that were sent --

(Background noise interruption.)

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

BY MR. HILL:

Q. Yes, please. Yeah.

A. The productions that were submitted by Clayton County.

Q. Okay. Did you review anything else?

A. No.

Q. Okay.

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

1 A. Correct.

2 Q. Right?

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

5 A. I have met with my legal team.

6 Q. Okay.

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

9 A. That is correct.

10 Q. Okay.

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

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

17 Q. Okay.

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

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

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

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

25 Q. Okay. And you started in 2003?

1 A. That is correct, January of 2003.

2 Q. Okay.

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

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

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

9 A. I don't.

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

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

14 Q. Okay.

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

19 Q. Okay.

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

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

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

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

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

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

10 A. Most likely, yes.

11 Q. Okay.

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

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

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

18 A. Yes, in the hallway.

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

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

22 Q. Who did you report it to?

23 A. Jane Tuttle.

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

25 A. She was the grants manager.

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

2 A. No, I did not.

3 Q. What did you say to Jane Tuttle?

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

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

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

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

18 Q. Okay.

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

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

23 Q. Okay.

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

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

3 A. Not at all.

4 Q. Okay.

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

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

11 Q. And what did he say?

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

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

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

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

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

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

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

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

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

1 to evacuate from the property.

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

4 A. I did not.

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

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

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

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

11 Q. Okay.

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

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

16 Q. What about Judge Teske?

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

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

25 A. Correct.

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

3 A. Well, if I can back up.

4 Q. Sure.

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

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

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

14 Q. Okay.

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

18 MR. MEW: Object to form.

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



1 BY MR. HILL:

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

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

7 Q. Okay.

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

12 MR. MEW: Object --

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

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

15 THE WITNESS: Yes.

16 BY MR. HILL:

17 Q. Okay.

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

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

22 Q. Okay.

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

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

6           Q.     Who told you that?

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

10          Q.     When did she tell you this?

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

14          Q.     Okay.

15          A.     -- 2011.

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

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

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

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

1 surprised.

2 Q. Okay. Why were you surprised?

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

10 Q. Okay.

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

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

16 Q. Okay.

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

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

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

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

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

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

6 Q. Okay.

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

10 A. Not that I could recall.

11 Q. Okay.

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

15 A. Not that I can recall.

16 Q. Okay.

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

21 MR. MEW: Object to form.

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

24 BY MR. HILL:

25 Q. Okay.

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

5                   A.     That is correct.

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

8                   A.     Correct.

9                   Q.     Okay.

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

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

15                  Q.     Okay.

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

19                  A.     Yes.

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

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

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

5           Q.     Why is everything duck-themed?

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

8           Q.     Mm-hmm.

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

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

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

19           A.     Correct.

20           Q.     Is that what you mean? Okay.

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

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

25           Q.     Okay.

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

4           A.    We had, yes.

5           Q.    Okay.

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

9           A.    That's correct.

10          Q.    Okay. More than once?

11          A.    Yes.

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

14          A.    Yeah, I think so.

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

17          A.    Yes.

18          Q.    Okay.

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

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

24          Q.    Okay.

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

1 matter of fact.

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

4 A. That is correct.

5 Q. Okay.

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

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

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

13 A. I do not recall that, either.

14 Q. Okay.

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

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

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

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



1 date.

2 BY MR. HILL:

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

7 A. 12 years.

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

11 A. I believe it was 2006.

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

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

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

18 A. Not really.

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

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

22 Q. Okay.

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

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

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

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

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

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

13 A. Yes.

14 Q. Oh, okay. Sorry. Sorry.

15 A. And there was a lien that --

16 Q. I thought you said you were renting.

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

20 Q. Okay.

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

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

25 A. Not at all.

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

3 A. Most likely, no.

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

6 MR. MEW: Object to form.

7 THE WITNESS: Probably not.

8 BY MR. HILL:

9 Q. You know who Paul Holland is?

10 A. Yes.

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

14 MR. MEW: Michael, I just --

15 MR. HILL: Yeah.

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

18 MR. HILL: Yeah.

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

21 MR. HILL: Yeah.

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

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

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

7 MR. HILL: Yeah.

8 MR. MEW: Okay.

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

11 MR. MEW: Yeah, I understand.

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

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

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

21 BY MR. HILL:

22 Q. Is that true? Is that --

23 A. Yes.

24 Q. Okay. Okay.

25 Do you recall when -- like just years you

1 were in a relationship with Mr. Holland?

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

5 Q. Okay.

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

9 A. No, I was not.

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

11 A. Yes.

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

13 Okay.

14 A. Correct.

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

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

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

22 A. That is correct.

23 Q. Okay.

24 A. My primary residence was Jonesboro.

25 Q. Okay. Okay.

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

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

4           Q.    Okay.

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

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

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

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

15          Q.    Okay.

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

19          A.    Yes.

20          Q.    Okay.

21          A.    I assume so.

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

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

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

1 was?

2 A. I don't.

3 Q. Okay.

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

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

8 Q. Okay.

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

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

13 Q. Okay.

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

16 A. I think so, yes.

17 Q. What about Carol Gossett?

18 A. No.

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

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

1 Q. Okay.

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

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

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

8 A. I don't know.

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

11 A. I don't know.

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

13 A. I don't know.

14 Q. -- whether he knew? Okay.

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

20 THE WITNESS: I apologize.

21 MR. MEW: No problem.

22 BY MR. HILL:

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



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

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

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

7 MR. MEW: Object to form.

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

10 BY MR. HILL:

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

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

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

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

21 BY MR. HILL:

22 Q. Mm-hmm.

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

25 Q. Okay.

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

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

12           MR. HILL: Right. I --

13           MR. MEW: So --

14 BY MR. HILL:

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

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

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

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

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

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

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

7 Q. Okay.

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

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

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

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

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

20 Q. Okay.

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

24 A. Yes, she did.

25 Q. When did that conversation occur?

1 A. When I was terminated.

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

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

6 Q. Okay.

7 A. June 3rd was a Monday.

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

10 A. Correct.

11 Q. What did Ms. Crawford tell you?

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

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

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

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

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

1 asked to leave the property.

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

4 A. Yes.

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

7 A. She said they did.

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

10 A. Apparently not. I --

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

13 A. No, I don't.

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

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

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

1 Q. Who told you about this meeting?

2 A. Shelley Johnson.

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

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

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

11 A. That is a true statement.

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

13 MR. MEW: Object to form.

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

16 BY MR. HILL:

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

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

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

1 she?

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

4 Q. Okay.

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

11 MR. MEW: Object to form.

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

15 BY MR. HILL:

16 Q. Okay.

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

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

21 A. That is correct.

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

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

25 Q. Okay.

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

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

8           A.     No.

9           Q.     Oh, okay.

10          A.     Gerald.

11          Q.     Okay. What's your address?

12          A.     My current address?

13          Q.     Yes.

14          A.     3818 Beya Way, Atlanta.

15          Q.     How long have you lived there?

16          A.     Since 2014.

17          Q.     Okay. Where did you live before?

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

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



1 kind of close to that exit. Okay.

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

6 A. That is correct.

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

9 A. Correct.

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

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

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

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

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

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

1 A. No, the county.

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

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

6 Q. Okay.

7 A. So -- I'm sorry.

8 Q. Who unfriended you on social media?

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

11 Q. Who is he?

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

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

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

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

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

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

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

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

25 A. Yes, I did.

1 Q. Why did you believe that?

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

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

9 A. Uh-uh.

10 Q. Okay.

11 A. No.

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

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

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

22 A. No.

23 Q. Okay.

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

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

3 A. Not that I can recall, no.

4 Q. Okay.

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

8 A. No.

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

10 A. I do.

11 Q. Do you have a LinkedIn account?

12 A. No, I don't.

13 Q. Instagram?

14 A. No.

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

17 A. No.

18 Q. Are you married?

19 A. No.

20 Q. Okay. Do you have any children?

21 A. No.

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

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

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

6 Q. Okay. Yes, please.

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

12 Q. Okay.

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

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

21 A. No.

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

23 A. For the most part, yes.

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

25 A. Valdosta High School in Valdosta, Georgia.

1 Q. Did you go to college?

2 A. I did.

3 Q. Where did you go?

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

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

10 A. No.

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

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

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

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

19 Q. That --

20 A. My degree was sociology.

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

23 A. That is correct.

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

25 A. No.

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

2 A. No.

3 Q. Ever been arrested before?

4 A. One time.

5 Q. When was that?

6 A. That was in 1982.

7 Q. And what was that about?

8 A. It was about suspicion of drunk driving.

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

11 A. No.

12 Q. Okay.

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

16 A. No.

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

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

21 Q. Was there a lawsuit about that?

22 A. There was.

23 Q. There was? Where was the lawsuit?

24 A. Fulton County.

25 Q. Fulton County. What was the outcome of

1 that?

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

6 Q. And --

7 A. My understanding --

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

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

13 Q. What was his name? The driver?

14 A. I don't recall.

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

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

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

20 A. That is correct.

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

22 A. I don't.

23 Q. Okay. Have you ever been divorced?

24 A. No.

25 Q. You ever filed for bankruptcy?



1 A. No.

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

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

8 Q. When was that?

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

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

13 A. No.

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

16 A. Other than work-related situations.

17 Q. Oh, right. Okay.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

23 Q. Okay.

24 A. So I did initial assessments.

25 Q. Okay. Was it focused on children or

1 adults?

2 A. Both.

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

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

5 Q. Okay. So until about '99?

6 A. I can't recall right off.

7 Q. Okay. What did you do next?

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

9 with the Northeast Georgia Regional Development

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

11 III Coordinator for dislocated workers.

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

13 A. For a couple years.

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

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

16 Q. What were you doing for Safeco?

17 A. I was a customer service rep.

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

19 job?

20 A. That must've been around 2000.

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

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

1 Q. Mm-hmm.

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

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

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

12 Q. Okay.

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

19 Q. Okay.

20 A. And I did.

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

23 A. Mm-hmm.

24 Q. Okay.

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

1 Marriott transferred Mr. Sweat back to Atlanta.

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

4 A. Yeah.

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

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

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

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

21 A. Yeah. Mm-hmm.

22 Q. Okay.

23 A. Yeah. Yes.

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

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

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

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

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

14          A.     No, I never had --

15          Q.     No.

16          A.     -- that title.

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

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

22          Q.     What do you mean?

23          A.     I was asked --

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

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

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

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

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

8 Q. Okay.

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

12 Q. Okay.

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

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

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

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

25 Q. Okay. You did get some pay increases

1 throughout your employment at Clayton County;  
2 correct?

3 A. I did.

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

5 A. Correct.

6 Q. Okay.

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

11 A. No.

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

14 A. No.

15 MR. MEW: Hey, Michael?

16 MR. HILL: Yeah.

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

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

22 MR. MEW: Sure.

23 BY MR. HILL:

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



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

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

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

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

8 Q. At other employers?

9 A. At other employers.

10 Q. How many times?

11 A. Maybe twice.

12 Q. So what was the first one?

13 A. When I was employed at Neiman Marcus.

14 Q. That was before Clayton County?

15 A. That was after.

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

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

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

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

1 Q. Who was that coworker?

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

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

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

10 Q. Right.

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

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

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

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

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

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

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

11 Q. Okay.

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

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

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

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

25 Q. Okay.



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

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

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

11 Q. Okay. And what was her name?

12 A. Teresa Jones.

13 Q. Teresa Jones.

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

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

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

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

3                   Q.     Mm-hmm.

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

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

15                  Q.     Okay.

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

19                  A.     I don't know for sure.

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

22                  A.     I don't know.

23                  Q.     Oh, okay.

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

1 manager, in -- generally; right?

2 A. Yes.

3 Q. Okay. Okay. Okay.

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

7 A. Correct. I did not --

8 Q. Okay.

9 A. -- do that.

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

14 A. No.

15 Q. Okay.

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

20 A. I do.

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

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

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

3 A. I don't know.

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

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

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

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

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

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

21 Q. Okay.

22 A. -- or made that comment.

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

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



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

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

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

13 A. Yes.

14 Q. Okay.

15 A. Including --

16 Q. Including what?

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

20 Q. Okay.

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

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

4           Q.    Okay.

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

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

9           Q.    The one from 2003?

10          A.    Yeah.

11          Q.    Okay.

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

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

23          Q.    Mm-hmm.

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

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

4 Q. Mm-hmm.

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

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

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

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

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

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

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

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

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

23 Q. Mm-hmm.

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

1 Q. Anything else?

2 A. On that --

3 Q. Yeah.

4 A. -- topic?

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

7 A. As I can --

8 Q. -- of infractions.

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

10 Q. Okay.

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

15 A. Yes.

16 Q. Okay.

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

20 MR. MEW: Object to form.

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

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

5 BY MR. HILL:

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

7                   A.     Correct.

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

12                  A.     At the time, no.

13                  Q.     Right.

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

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

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

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

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

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

3 A. Pretty much, yes.

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

6 A. Correct.

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

10 A. No, I did not suggest that.

11 Q. Okay.

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

16 A. That is correct.

17 Q. Okay.

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

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

24 Q. Yeah.

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

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

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

9 Q. Okay.

10 A. -- and stay at my home.

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

13 A. Maybe 2012, yes.

14 Q. Okay.

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

18 A. That's probably fair.

19 Q. Okay.

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

22 A. Towards the end.

23 Q. Okay.

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



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

3 Q. Okay.

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

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

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

12 Q. Okay.

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

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

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

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

1 schedule.

2 Q. Okay.

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

6 A. Correct.

7 Q. Okay.

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

10 A. No.

11 Q. Okay.

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

15 A. Correct.

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

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

21 Q. Okay.

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

24 Q. Okay.

25 And then was there someone else kind of on

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

3 A. No.

4 Q. Okay.

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

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

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

12 A. That is correct.

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

15 A. Correct.

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

18 A. Correct.

19 Q. Okay. Shelley Johnson was one?

20 A. Correct.

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

23 A. Correct.

24 Q. Okay.

25 And those volunteers were the -- they were

1 the court-appointed special advocates; right?

2 A. Correct.

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

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

7 Q. Okay.

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

14 Q. Who was that?

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

21 Q. Okay.

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

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

3 A. Correct.

4 Q. Okay.

5 A. I feel like we did.

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

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

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

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

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

15 A. Correct.

16 Q. Okay.

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

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

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

3 Q. Okay.

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

7 A. She would submit it to me.

8 Q. Okay. Like an expense reimbursement form?

9 A. Mm-hmm. Correct.

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

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

15 Q. Okay.

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

23 Q. Okay.

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

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

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

10 Q. Mm-hmm. Okay.

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

14 A. That's correct.

15 Q. Okay.

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

19 A. Correct.

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

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

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

1 A. That's my understanding.

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

4 A. I imagine so, yes.

5 Q. Okay.

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

8 A. No.

9 Q. Okay.

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

13 A. Yes.

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

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

18 Q. Okay.

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

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

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



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

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

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

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

15 A. I honestly don't recall.

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

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

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

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

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

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

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

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

10 Q. Okay.

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

13 Q. Okay.

14 A. So thank you.

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

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

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

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

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

10 Q. Okay.

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

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

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

20 A. Correct.

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

23 A. That is correct.

24 Q. Okay.

25 At the time you worked there, Carol

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

2 A. That is correct.

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

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

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

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

24 Q. Mm-hmm.

25 A. And then that volunteer supervisor would

1 stand in for that volunteer in the courtroom.

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

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

8 Q. Okay.

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

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

12 A. Correct.

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

16 A. No.

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

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

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

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

25 Q. Okay.

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

5           A.     Correct.

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

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

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

11           MR. MEW:   Object to form.

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

14 BY MR. HILL:

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

19           MR. MEW:   Same objection.

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

1 BY MR. HILL:

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

5 A. I did not track that, no.

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

8 MR. MEW: Object to form.

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

10 BY MR. HILL:

11 Q. Okay.

12 A. Child abuse does not discriminate.

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

16 MR. MEW: Same objection.

17 BY MR. HILL:

18 Q. Just based on your recollection?

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

21 Q. Sure.

22 A. Just a sec.

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

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

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

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

7 Q. Right.

8 A. Yes.

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

13 MR. MEW: Object to form.

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

19 BY MR. HILL:

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

22 A. That it's predominantly black.

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

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



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

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

6 A. That is correct.

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

9 A. Correct.

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

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

14 Q. Okay.

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

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

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

25 A. I have no idea.

1 Q. Okay.

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

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

6 THE WITNESS: That's correct.

7 BY MR. HILL:

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

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

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

20 Q. What is the Casey Foundation Grant?

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

24 Q. Okay.

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

1 Q. Anyone else heard him say this?

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

4 Q. Who else was sitting there?

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

8 Q. Anybody else you can recall being there?

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

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

15 MR. MEW: Object to form.

16 THE WITNESS: Not necessarily.

17 BY MR. HILL:

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

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

25 Q. Okay. Could you reimburse alcohol from any

1 other source of money?

2 A. No.

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

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

9 Q. Okay.

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

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

19 Q. Okay.

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

23 A. Yes.

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

1 MR. MEW: Object to form.

2 THE WITNESS: That is correct.

3 BY MR. HILL:

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

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

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

11 A. That is correct.

12 Q. Okay.

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

17 A. Yes, I have.

18 (Exhibit Number 1 marked for  
19 identification.)

20 BY MR. HILL:

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

22 A. No, I was not.

23 Q. Okay.

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

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

6 Do you see where I'm talking about?

7 A. Yes, I do.

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

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

12 Q. Okay.

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

18 MR. MEW: Object to form.

19 THE WITNESS: Yes, among other things.

20 BY MR. HILL:

21 Q. Would it include advertising?

22 A. Yes.

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

25 A. It would include speaking engagements,

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

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

8 A. Correct.

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

11 A. They did.

12 Q. They did.

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

16 A. Correct.

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

19 A. That is correct.

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

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

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

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

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

6 Q. Mm-hmm.

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

11 Q. So like, donations from individuals?

12 A. Correct.

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

15 A. That is correct.

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

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

21 Q. Okay.

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



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

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

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

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

15           A.    That is correct.

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

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

19           Q.    Okay.

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

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

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

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

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

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

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

1 awareness and to show up at events.

2 Q. Any other fundraisers?

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

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

8 A. That is correct.

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

13 A. Correct.

14 MR. MEW: Object to form.

15 BY MR. HILL:

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

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

22 A. Correct.

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

1 into the court; right?

2 A. Correct.

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

5 A. Yes.

6 Q. Right. Okay.

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

11 A. Correct.

12 Q. Okay.

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

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

18 Q. Okay.

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

22 A. Correct.

23 Q. Okay.

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

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1 it?

2 MR. MEW: Object to form.

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

5 BY MR. HILL:

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

8 MR. MEW: Same objection.

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

13 BY MR. HILL:

14 Q. Mm-hmm.

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

17 Q. Okay.

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

22 Q. Mm-hmm.

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

1 on a much smaller scale.

2 Q. Mm-hmm.

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

6 Q. Okay.

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

10 Q. Okay.

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

13 MR. MEW: Object to form.

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

17 BY MR. HILL:

18 Q. Okay.

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

24 MR. MEW: Same objection.

25 BY MR. HILL:

1 Q. As far as you know?

2 A. That's my understanding.

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

5 A. Correct.

6 Q. Okay.

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

9 MR. MEW: Object to form.

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

12 BY MR. HILL:

13 Q. Right.

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

17 MR. MEW: Same objection.

18 THE WITNESS: That is correct.

19 BY MR. HILL:

20 Q. Okay.

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

24 MR. MEW: Object to form.

25 THE WITNESS: No, but they would sometimes

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1 ask my opinion or ask for advice.

2 BY MR. HILL:

3 Q. Okay.

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

7 A. That is correct.

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

9 A. No, I did not.

10 Q. Okay.

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

13 MR. HILL: Yeah.

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

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

17 MR. MEW: Oh, sorry.

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

20 (A break was taken.)

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

23 BY MR. HILL:

24 Q. All right.

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



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

5 Have you seen these before?

6 A. Yes, I have.

7 (Exhibit Number 2 marked for  
8 identification.)

9 BY MR. HILL:

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

12 A. No, I was not.

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

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

17 Q. Okay.

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

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

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

5 You see that part where I'm reading?

6 A. Yes, I do.

7 Q. Okay.

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

15 Do you see where I'm reading there?

16 A. Yes, I do.

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

20 MR. MEW: Object to form.

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

25 BY MR. HILL:

1 Q. Okay.

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

5 A. Correct.

6 Q. Okay.

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

10 A. No, it does not.

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

14 MR. MEW: Object to form.

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

19 BY MR. HILL:

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

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

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

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

3 A. Yes, I do.

4 Q. Okay.

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

12 A. Yes, I do.

13 Q. Okay.

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

17 A. That is correct.

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

21 MR. MEW: Object to form.

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

24 MR. HILL: Right.

25 THE WITNESS: -- prior to the GAL monies

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

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

7 BY MR. HILL:

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

9 MR. MEW: Object to form.

10 THE WITNESS: Correct.

11 BY MR. HILL:

12 Q. Okay.

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

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

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

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

21 A. Yes.

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

24 A. I was.

25 Q. Do you recall when she testified that the

1 board did not have oversight over the GAL account?

2 MR. MEW: Object to form.

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

8 BY MR. HILL:

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

15 A. Mm-hmm.

16 (Exhibit Number 3 marked for  
17 identification.)

18 BY MR. HILL:

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

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

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1 it looks like, four or five.

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

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

11 Do you see that?

12 A. I do.

13 Q. Okay.

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

16 MR. MEW: Object to form.

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

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

24 BY MR. HILL:

25 Q. Mm-hmm.

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

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

11 BY MR. HILL:

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

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

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



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

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

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

10 A. I do.

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

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

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

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

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

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

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

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

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

24 MR. MEW: Object to the form.

25 BY MR. HILL:

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

4 MR. MEW: Same objection.

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

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

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

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

21 MR. MEW: Sure.

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

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

25 (A break was taken.)

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

3 BY MR. HILL:

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

6 A. Yes.

7 Q. All right. All right.

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

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

14 A. (No audible response.)

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

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

19 A. It appears to be, yes.

20 (Exhibit Number 4 marked for  
21 identification.)

22 BY MR. HILL:

23 Q. Okay.

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

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1 it; is that right?

2 A. That is correct.

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

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

9 Q. Okay. Who was that intern?

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

13 Q. Okay.

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

16 A. That is correct.

17 Q. Oh, okay.

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

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

23 Q. Okay.

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

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1 recollection?

2 A. None that I can recall.

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

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

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

12 A. I believe so.

13 Q. Okay.

14 A. Yes.

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

18 A. I assume this was the only one.

19 Q. Okay.

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

25 MR. MEW: Object to form.

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1 THE WITNESS: Yes.

2 BY MR. HILL:

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

5 MR. MEW: Object to form.

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

12 BY MR. HILL:

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

15 A. That is correct.

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

18 A. Correct.

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

24 A. Correct.

25 Q. Okay.

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

4                   MR. MEW: Object to form.

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

7 BY MR HILL:

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

10                  A. As I recall.

11                  Q. Okay.

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

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

19                  A. I do.

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

25                  A. Yes.



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1 Q. Okay.

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

5 MR. MEW: Object to form.

6 BY MR. HILL:

7 Q. Was there?

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

9 Q. Okay.

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

13 A. Yes, as stated in the document.

14 Q. Right.

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

19 MR. MEW: Object to form.

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

23 BY MR. HILL:

24 Q. What other services could it include?

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

1 example, for the Duck Derby, or it could also  
2 include recruitment of sponsorships and donors.

3 Q. Your interpretation of that, where does  
4 that come from?

5 A. My years of volunteer management and  
6 experience and with the understanding that  
7 recruitment is a relationship-building process.

8 Q. A relationship-building process with whom?

9 A. With a potential volunteer. With a  
10 potential donor or sponsor or even an existing  
11 volunteer, donor, or sponsor.

12 Q. Okay. This document does not talk about  
13 donors or sponsors; does it?

14 MR. MEW: Object to form.

15 THE WITNESS: It references recruitment,  
16 training, and retention.

17 BY MR. HILL:

18 Q. Volunteer -- just to be clear, it does  
19 actually say, "Volunteer recruitment, training, and  
20 retention." Correct?

21 MR. MEW: Same objection.

22 THE WITNESS: Yes, it does, but I would  
23 consider those other individuals in the  
24 volunteer category.

25 BY MR. HILL:

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1 Q. Okay.

2 This next section beneath it, Section 3,  
3 it's the, "Role and responsibility of a CASA  
4 volunteer." Do you see that?

5 A. I do.

6 Q. This section looks like a fairly detailed  
7 discussion of what a CASA volunteer does; is that  
8 right?

9 MR. MEW: Object to form.

10 THE WITNESS: Yes, it appears to be pretty  
11 thorough.

12 BY MR. HILL:

13 Q. And this Section 3, "Role and  
14 responsibility of a CASA volunteer," does not say  
15 anything about Duck Derby or any other fundraising  
16 events; does it?

17 MR. MEW: Object to form.

18 THE WITNESS: No, it outlines more so of  
19 the core process.

20 BY MR. HILL:

21 Q. Okay.

22 So when this document talks about  
23 volunteers, the only volunteers discussed in this  
24 document are the court-appointed special advocates;  
25 right?

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1 MR. MEW: Objection to form.

2 THE WITNESS: I'm not sure I understand  
3 your question.

4 BY MR. HILL:

5 Q. Well, I understand that someone could be a  
6 volunteer at the Duck Derby, for instance. That's an  
7 example of a volunteer; right?

8 A. Correct.

9 Q. Okay. Someone could be a volunteer at like  
10 a 5K, and they give out water to participants;  
11 right?

12 A. Correct.

13 Q. Okay.

14 Someone could also be a volunteer in the  
15 CASA Program and undergo the training and serve as a  
16 CASA for a child in need; right?

17 A. Correct.

18 Q. Okay.

19 So in this universe of people that we can  
20 call volunteers, the only ones the MOU talks about  
21 are the CASA volunteers; right?

22 MR. MEW: Same objection.

23 THE WITNESS: It refers to the primary  
24 role of the CASA GALs, but our CASA GALs were  
25 never required to go beyond the scope of what

1           they were expected to do in court.

2       BY MR. HILL:

3           Q.     Okay.

4                     And the MOU doesn't say anything about  
5       them going beyond this scope; right?

6           A.     It does not address that, no.

7           Q.     Okay.

8                     So before 2007, before this MOU was in  
9       effect, the court did not assess any fees to the  
10      parents in the Superior Court hearings for CASAs; is  
11      that right?

12          A.     It was not until this MOU was in place  
13      that we began providing services with Superior  
14      Court.

15          Q.     Okay. So what was the -- how was it set up  
16      before the MOU came into effect?

17          A.     Before this MOU, the only volunteer  
18      options that a person could choose from would be to  
19      be a -- what we would consider a regular CASA  
20      volunteer, working deprivation cases within Clayton  
21      County Juvenile Court. They could volunteer with our  
22      ABCs, the Ambassadors Behind CASA, or they could  
23      volunteer to be one of the CASA guardians.

24          Q.     Okay. Was there any recruitment, training,  
25      or retention of CASA volunteers before 2007?

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1 A. Yes.

2 MR. MEW: Object to form.

3 BY MR. HILL:

4 Q. Where -- where would that money have come  
5 from before -- you know, when this \$500 wasn't being  
6 assessed to the parents -- where would the money for  
7 that recruitment, training, and retention come from?

8 A. A large percentage, I would say, would --  
9 would have come from the FCCC. However, there might  
10 have been some grant categories that would allow for  
11 certain recruitment, training, or retention  
12 activities.

13 Q. Okay.

14 And before the MOU was effective, the  
15 parents in the Superior Court hearings would have to  
16 pay the attorneys who served as guardians ad litem;  
17 is that right?

18 A. That is my understanding, yes.

19 Q. And so the fee they would be paid, I  
20 guess, would be paid -- I mean, would be -- would  
21 depend on the attorney's hourly rate.

22 MR. MEW: Object to form.

23

24 BY MR. HILL:

25 Q. Is that your understanding?

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1 A. I would imagine so, and yes.

2 Q. Usually, that would probably be -- that  
3 total would probably be more expensive than the \$500  
4 contemplated by this document?

5 MR. MEW: Same objection.

6 THE WITNESS: That would be my  
7 understanding based on the conversations when  
8 that \$500 amount was decided by the Superior  
9 Court judges.

10 BY MR. HILL:

11 Q. Okay.

12 So is it fair to say that part of the idea  
13 behind the MOU was to have a more cost-effective  
14 system for getting advocates for the children you  
15 serve?

16 MR. MEW: Object to the form.

17 THE WITNESS: I think the -- the value  
18 that CASA brought to the courtroom is what led  
19 the judges of Superior Court to sit down and  
20 talk to us about creating this opportunity and  
21 sort of jumpstarted.

22 BY MR. HILL:

23 Q. Okay.

24 The part of the idea, wasn't it also to  
25 kind of save these parents some money? They only

1 have to pay \$500 instead of whatever the GAL  
2 attorney was going to charge them?

3 MR. MEW: Same objection.

4 THE WITNESS: I recall there being  
5 conversation that it -- it would, in some  
6 cases, save the parents some money, but I also  
7 remember in that conversation that the judges  
8 felt that was a fair and reasonable amount for  
9 the value that CASA brought into the courtroom.

10 BY MR. HILL:

11 Q. Okay. And the MOU did not govern any of  
12 the money in the FCCC board account or the ABC  
13 account; right?

14 A. My recollection is that when this document  
15 was presented to the FCCC, they made the decision to  
16 create the separate GAL account within the family of  
17 accounts that the FCCC managed.

18 Q. Okay.

19 But the -- as far as your -- just your  
20 understanding of the MOU, it doesn't have anything  
21 to do with how -- how the FCCC spends the board  
22 account funds; right?

23 MR. MEW: Object to form.

24 THE WITNESS: Well, they -- the board, as  
25 I recall, wanted the money to be separate.



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1 BY MR. HILL:

2 Q. Yeah.

3 A. So yes, this doctrine did -- document did  
4 not govern their money that they brought in through  
5 their fundraising efforts.

6 Q. Okay. And was it your -- well, was it your  
7 idea to have the FCCC hold the money for the GAL  
8 account?

9 A. The conversations that I was involved with  
10 and present during with the juvenile -- with the  
11 Superior Court judges, they specifically wanted the  
12 money to go to the FCCC, and purposefully, wanted to  
13 bypass county finance. Stating that it was -- the  
14 money was to go to the FCCC board for use of or for  
15 purposes of recruitment, training, and retention  
16 with oversight by the board and not the county.

17 Q. Okay. Which Superior Court judges told you  
18 that?

19 A. I had conversations with Judge Benefield  
20 and with the judge that signed the document,  
21 Judge Simmons.

22 Q. Okay.

23 Do you know -- do you know why the FCCC  
24 kept the GAL funds in a separate account instead of  
25 just adding it to its board account?

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1           A.    My belief is that, again, they were sort  
2 of excluded in conversations and having Sabrina's  
3 name, who was the chairman of the board at that  
4 time, removed. And, again, initially, the treasurer  
5 handled all reimbursements, and then the decision  
6 was to hand that responsibility off to me.

7           Q.    Wait, but I think you did say it was the  
8 FCCC board that decided to have a separate account  
9 for the GAL funds; right?

10          A.    They did. They decided to --

11          Q.    Okay.

12          A.    -- put those monies separately.

13          Q.    Do you know why they wanted to keep the  
14 money separate?

15          A.    I do not.

16          Q.    Okay. Did you ever think about it?

17                MR. MEW: Object to form.

18                THE WITNESS: Not really, no.

19 BY MR. HILL:

20          Q.    Did you ever believe that just having it  
21 all in one account would make more sense instead of  
22 having two separate accounts?

23                MR. MEW: Object to form.

24                THE WITNESS: I did not have control over  
25 those decisions. That was board money, and they

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1           made the decision on how those accounts would  
2           be set up.

3       BY MR. HILL:

4           Q.     Is it because the two accounts, the GAL  
5           account and the board account, they have different  
6           sources of money and different purposes of money?  
7           Isn't that why they're separate accounts?

8           MR. MEW:   Object to form.

9           THE WITNESS:   I don't know that that is a  
10          -- excuse me -- is a true statement. My belief  
11          was that they just wanted to be able to, for  
12          record-keeping purposes, have the money  
13          separate.

14       BY MR. HILL:

15          Q.     In the -- generally speaking, in the  
16          relationship between Clayton County CASA and FCCC,  
17          FCCC existed to support Clayton County CASA; is that  
18          right?

19          A.     Correct.

20          Q.     Okay.

21                  And so Clayton County CASA is like the  
22          beneficiary of that relationship.

23          MR. MEW:   Object to form.

24       BY MR. HILL:

25          Q.     Right?

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1 A. In some terms, yes.

2 Q. Okay. Clayton County CASA does not exist  
3 to support FCCC; right?

4 A. Correct.

5 Q. Okay. And you had two debit cards; is that  
6 correct? One for the GAL account and one for the  
7 FCCC board account?

8 A. That is incorrect.

9 Q. That's incorrect? So you're saying you had  
10 -- only had one debit card?

11 A. I was issued by the board the debit card  
12 for the GAL --

13 Q. Okay.

14 A. -- account.

15 Q. And you didn't -- so you're saying you did  
16 not have a debit card for the board account?

17 A. Not that I recall.

18 Q. Okay. You're aware that the auditors found  
19 that you had two debit cards; right?

20 A. I'm not aware --

21 MR. MEW: Object to form.

22 THE WITNESS: -- of that.

23 BY MR. HILL:

24 Q. Okay.

25 Do you recall Sabrina Crawford testifying

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1 that you had a debit card for each of those accounts  
2 -- those two accounts?

3 A. I do recall her statement.

4 Q. Okay. Do you have any idea why she felt  
5 you had a debit card for the GAL account and the  
6 board account?

7 MR. MEW: Object to form.

8 THE WITNESS: I don't know.

9 BY MR. HILL:

10 Q. Okay. Have you talked to Sabrina Crawford  
11 since her deposition?

12 A. No, I have not.

13 Q. Okay. So you were not able to access the  
14 FCCC board funds directly; were you?

15 A. No.

16 Q. So if you had wanted the FCCC board to pay  
17 for something, you would have to have gone to them  
18 for approval -- to the board for approval; right?

19 A. That is correct.

20 Q. Okay.

21 And according to the bylaws that we looked  
22 out -- looked at earlier, for expenses above \$500,  
23 you would have had to -- had to have gotten two  
24 board member approvals; right?

25 A. Under which account?

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1 Q. Oh, under the -- the FCCC bylaws, if you  
2 had wanted the board to pay for something from the  
3 board account and it cost more than \$500, that  
4 required the approval of two board members; is that  
5 right?

6 A. That is my understanding, yes.

7 Q. Okay. But there -- there were no controls  
8 over expenditures like that for the GAL account;  
9 were there?

10 MR. MEW: Object to form.

11 THE WITNESS: There was the same policy or  
12 requirement that any check over \$500 would have  
13 to have two signatures from the signature --  
14 signatory card.

15 BY MR. HILL:

16 Q. There's not a document that says that for  
17 the GAL account; is there?

18 A. I believe it stated it on the individual  
19 checks.

20 Q. On the checks for the GAL account, it says  
21 that?

22 A. I believe so.

23 Q. Okay.

24 But you were -- the board issued you a  
25 debit card for the GAL account so that you would not

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1 have -- so that you would not have to come to the  
2 board directly for each expense you wanted to pay  
3 for; is that right?

4 MR. MEW: Object to form.

5 THE WITNESS: My understanding was that  
6 there was concern by them that I was having to  
7 come out of pocket a lot of times and then wait  
8 to be reimbursed. And then it became a  
9 challenge for the board to keep up with the  
10 reimbursements. And that's when the decision by  
11 the board was made to have myself added.

12 And maybe that was when they created the  
13 GAL account separate. But they -- that's the  
14 point where I went and met Sabrina and a couple  
15 of the other board members at the bank, and  
16 they had my name added to the -- the card. And  
17 specifically only the GAL account.

18 BY MR. HILL:

19 Q. No -- to your knowledge, no one else had a  
20 debit card for the GAL account; right?

21 A. Not that I'm aware of.

22 Q. Okay. And the board would not have been  
23 permitted to spend anything from the GAL account  
24 without you approving it; would they?

25 MR. MEW: Object to form.

1 THE WITNESS: I don't recall any instance  
2 where they came to me. I know there was an  
3 issue at one of our functions where I was  
4 instructed by Teske to use the card to cover  
5 alcohol costs from individuals that had  
6 attended the function, ordered their own  
7 beverages from the bar, and then either forgot  
8 or walked out and did not pay for them.

9 BY MR. HILL:

10 Q. Mm-hmm.

11 A. But as far as the board -- and I do  
12 believe Ms. Crawford was aware of that. But outside  
13 of that, I can't recall at this moment.

14 Q. You don't recall -- you don't know of an  
15 instance where the board spent any money from the  
16 GAL account that did not go through you; is that  
17 what you're saying?

18 A. Again, I'm -- I'm -- my memory. I -- I'm  
19 struggling with exactly when the GAL account was  
20 established.

21 Q. Mm-hmm.

22 A. Because, again, I was going to the  
23 treasurer. So during that time before that, I don't  
24 know if the board may have spent money from that --

25 Q. Okay.



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1 A. -- those funds.

2 Q. But after you had a debit card, the board  
3 never spent GAL account funds; right?

4 MR. MEW: Object to form.

5 THE WITNESS: Based on my memory, at this  
6 point, no. They -- they did not come to me and  
7 ask or that I'm aware of that they spent money,  
8 no.

9 BY MR. HILL:

10 Q. Okay.

11 Now, I think Ms. Crawford testified that  
12 she believed either the GAL account or the FCCC  
13 board account could be used for any CASA-related  
14 expense. Do you remember -- do you remember that?

15 A. If it aligned with this term in the MOU --

16 Q. Mm-hmm.

17 A. -- for GAL monies, volunteer recruitment,  
18 training, and retention, she would be correct.

19 Q. Okay.

20 Did you believe that the GAL account and  
21 the board account, either one could be -- that they  
22 could be spent for the same purposes?

23 A. Yes.

24 Q. So if you needed to purchase something, it  
25 would be more convenient to use the GAL debit card

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1 as opposed to going to the board for approval to get  
2 money from the board account; right?

3 MR. MEW: Object to form.

4 THE WITNESS: Correct.

5 And if I can back up, as long as it  
6 related to recruitment, training, and  
7 retention.

8 BY MR. HILL:

9 Q. Okay.

10 Who decided -- you're the person who  
11 decided if it related to recruitment, training, and  
12 retention of volunteers; correct?

13 MR. MEW: Object --

14 BY MR. HILL:

15 Q. For the GAL account?

16 A. I felt like it was my responsibility most  
17 of the time, yes. With board advice when I felt it  
18 necessary.

19 Q. Okay.

20 But you did -- you did not have to get  
21 board approval to spend money from the GAL account;  
22 did you?

23 A. I did not --

24 MR. MEW: Object to form.

25 THE WITNESS: -- when they gave me the

1 authority to spend those funds for recruitment,  
2 training, and retention.

3 BY MR. HILL:

4 Q. Okay.

5 So after that point, when the board gave  
6 you that authority, you were the person who could  
7 request money from the GAL account and approve the  
8 expenditure and actually dispense the funds; right?

9 MR. MEW: Object to form.

10 THE WITNESS: If you break it down in  
11 those steps.

12 BY MR. HILL:

13 Q. If I break it down into those steps, you  
14 would be that person?

15 A. Yes.

16 Q. Okay. And you never saw anything wrong  
17 with one person being in charge of all of those  
18 steps?

19 MR. MEW: Object to form.

20 THE WITNESS: That was how it was decided  
21 by the board.

22 BY MR. HILL:

23 Q. Okay.

24 Do you believe now, sitting here today,  
25 that setting up an expense account that way could

1 provide an opportunity for wrongdoing?

2 MR. MEW: Object to form.

3 THE WITNESS: I suppose anything is  
4 possible.

5 BY MR. HILL:

6 Q. Like if someone were an unscrupulous  
7 person, they could abuse a setup like that for  
8 personal gain; right?

9 MR. MEW: Object to form.

10 THE WITNESS: It's possible.

11 BY MR. HILL:

12 Q. So would you agree that it is vital or  
13 extremely important that whoever is in that  
14 three-part role of expense requester, approver, and  
15 dispenser be someone who is a trustworthy  
16 individual; right?

17 MR. MEW: Same objection.

18 THE WITNESS: Yes.

19 BY MR. HILL:

20 Q. Because if the person in charge of that  
21 account is not trustworthy, they shouldn't be in  
22 charge of the account; right?

23 MR. MEW: Same objection.

24 THE WITNESS: I suppose, yes, which is why  
25 the -- the controls in place were that the bank

1 statements were being submitted to the  
2 administration of the court every month. They  
3 were being submitted and filed and presented at  
4 each board meeting for review.

5 BY MR. HILL:

6 Q. The board members reviewed the GAL account  
7 bank statements at each meeting?

8 A. They had the opportunity to review.

9 Q. Okay. Did they actually review them?

10 A. That I don't know. The books were always  
11 made available.

12 Q. Okay. You attended the board meetings;  
13 right?

14 A. I would probably say 99 percent.

15 Q. Okay.

16 Did they -- at the meetings you attended,  
17 did the board ever review the GAL account bank  
18 statements?

19 A. I remember occasionally having a -- a  
20 question. Not about a particular expense, but how's  
21 it looking? What's the account balance?

22 For a period of time, the board actually  
23 had their own office space. And, again, the books  
24 were actually kept there for a period. So they had  
25 -- whether I was there or it was a board meeting,

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1 they had access to the records at any given time.

2 Q. Okay.

3 We talked earlier about some of the  
4 fundraising events. At one point, there was some  
5 sort of, like, chicken biscuit sales at the  
6 courthouse; is that right?

7 A. That -- that is correct.

8 Q. Okay. That was not like fundraising for  
9 the FCCC board; right?

10 A. No, it was not.

11 Q. What -- what were the -- where did the --  
12 what was the purpose of the chicken biscuit sales?

13 A. Well, it was a project actually sponsored  
14 and presented by Chick-fil-A, which we had a very  
15 close relationship with. And it was a project where  
16 they would sell the biscuits to a charitable  
17 organization at a reduced price. And then you could  
18 sell the biscuits for whatever you wanted.

19 So staff had agreed it might be a good  
20 idea just to have some -- some kind of, like, petty  
21 cash, and we started selling the biscuits when --  
22 before we moved to the new location.

23 The Citizen Panel Review, they started  
24 observing and noticing. And we decided that if they  
25 wanted to participate, that they could. And, again,

1 it was always just a small amount of money just for  
2 miscellaneous.

3 And a lot of the intent was to allow the  
4 Citizen Panel Review, when -- when she needed --  
5 Ms. Cook, Concilia Chillumuna needed something for  
6 her group of volunteers. She didn't have a whole lot  
7 of funding sources. So there would be some petty  
8 cash for -- that she would be able to access.

9 Q. Okay. So that chicken biscuit money did  
10 not go to the GAL account?

11 A. No.

12 Q. Okay. It was just like a separate petty  
13 cash account -- was there an account?

14 A. No.

15 Q. Okay. So just like separate petty cash  
16 kept in the office?

17 A. Correct.

18 Q. Would you keep it in your office?

19 A. Yes.

20 Q. Okay. All of it, or did you split it up  
21 with Ms. Chillumuna?

22 A. She and I had had multiple conversations  
23 about sitting down and splitting the money. And, for  
24 whatever reason, it never happened.

25 Q. Okay. But this was all -- this, the

1 chicken biscuit sales never occurred in the new  
2 building; right?

3 A. No.

4 Q. Okay. I've seen some references to a men's  
5 fashion show. Was that an FCCC fundraiser?

6 A. No, it was not.

7 Q. What -- was that a Georgia CASA event?

8 A. That is correct.

9 Q. So Georgia CASA is another separate  
10 organization?

11 A. Correct. That's the state.

12 Q. Okay.

13 And so to make sure I get this right, is  
14 the purpose of Georgia CASA to support individual  
15 CASA programs throughout the state?

16 A. That is correct.

17 Q. Okay. So they would -- would they give  
18 money directly to Clayton County CASA?

19 A. Yes, in the form of an allocation. And  
20 it's my understanding that the majority of that  
21 allocation through their CASA grant to the county  
22 funded the majority of my position.

23 Q. Okay.

24 So they gave money to -- they allocated  
25 money to Clayton County and also other CASA programs



1 throughout the state?

2 A. That is correct.

3 Q. Okay.

4 A. They -- they are members of National CASA.

5 Q. Okay.

6 A. And the national organization, along with  
7 all the State organizations, CASA organizations,  
8 they would actually go to Washington, D.C., every  
9 year to speak on behalf of CASA programs and -- and  
10 child abuse victims, and the need for CASA.

11 So they were creating federal dollars that  
12 would come down that would be, in turn, allocated,  
13 like you just mentioned. And then aside from that,  
14 Georgia CASA, as a State organization, would also  
15 hold their own fundraising events to support all the  
16 programs, either through training or the Georgia  
17 CASA conference every year.

18 Q. Okay. Was there also like a 5K that was a  
19 CASA-related event?

20 A. That is correct.

21 Q. Was that Georgia CASA?

22 A. That was actually a Metro-collaborative  
23 CASA effort, which again included Clayton, Cobb,  
24 DeKalb, Fulton, and Gwinnett.

25 Q. Okay.

1                   So is -- is -- is there a separate  
2 organization called Metro Atlanta CASA?

3           A.     It's not a separate organization. It was  
4 just a group that was developed, and it developed  
5 over time. Initially, the program directors or  
6 coordinators got together casually on our own.

7                   And finally, Georgia CASA stated to us  
8 that all of you have been meeting on a regular basis  
9 to support each other. What if we were able to  
10 create a position at Georgia CASA and create a more  
11 formal gathering, which then became the Metro CASA  
12 Collaborative.

13           Q.     Okay. So money raised from that 5K, where  
14 would that money go?

15           A.     I'm assuming at least part of it went to  
16 cover the contract fees for the employee that  
17 Georgia CASA hired to work with the collaborative.  
18 But then that money would also go towards mutual  
19 events, like training events, where Fulton may do a  
20 day class of new volunteers, and Clayton would do  
21 the evening class.

22           Q.     Well -- well, who would hold the money?

23           A.     Georgia CASA.

24           Q.     Georgia CASA, okay.

25                   And for the men's fashion show, funds

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1 raised from that, that -- that would go to Georgia  
2 CASA?

3 A. That was a Georgia CASA fundraiser. And  
4 just to correct you, it wasn't a men's fashion show.

5 Q. Oh.

6 A. The event itself was known as the Georgia  
7 CASA Luncheon and Fashion Show, which included male  
8 models and female models on the runway.

9 Q. Oh, okay. I -- I -- I thought I saw in  
10 e-mails reference to it being a male fashion show;  
11 that's not correct?

12 A. No, that's not correct.

13 Q. Oh, okay.

14 I'll show you what I'm marking as  
15 Defendant's Exhibit 5. And I'll represent these are  
16 bank statements for the months in 2011 from the GAL  
17 account.

18 MR. MEW: Month of what?

19 (Exhibit Number 5 marked for  
20 identification.)

21 BY MR. HILL:

22 Q. All the months of 2011. The Bates numbers  
23 are not sequential because I was trying to put them  
24 in chronological order, so January through  
25 December of 2011.

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1                   Is this -- the handwritten portions that  
2                   are on some of these pages, is that your  
3                   handwriting?

4                   A.     On some of these entries, yes.

5                   BY MR. HILL:

6                   Q.     Okay. Oh, yeah, I see some that look  
7                   different.

8                   On the first page, would that be your  
9                   handwriting on the first page?

10                  A.     That is correct.

11                  Q.     Okay.

12                  MR. MEW: Michael?

13                  MR. HILL: Yeah.

14                  MR. MEW: Just for -- unless I'm missing a  
15                  page, I think for purposes of record, the last  
16                  one we have is the November statement. Am I  
17                  missing something? It's -- the Bates Number is  
18                  14034.

19                  MR. HILL: Oh.

20                  MR. MEW: Statement 12/07/2011.

21                  MR. HILL: Yeah, I have one more page.

22                  BY MR. HILL:

23                  Q.     Do you have -- Mr. Bostock, your last  
24                  page, is it 14034 or 14035?

25                  MR. MEW: I have three -- I'm sorry,

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1 Michael. You were asking the witness. I'm  
2 sorry.

3 THE WITNESS: I have 014035 as my last  
4 page.

5 MR. HILL: Okay.

6 MR. MEW: Right, I have 35. I just didn't  
7 know if it was -- because the dates that are  
8 reflected on 35 appear to be --

9 MR. HILL: Oh, but at the very top, it  
10 says 12/07/2011.

11 MR. MEW: Right, but I didn't know -- if  
12 you -- if you look at the other statements,  
13 they appear to be capturing the --

14 MR. HILL: Oh.

15 MR. MEW: -- trailing month up to the time  
16 of the statement.

17 MR. HILL: Okay.

18 MR. MEW: So I didn't --

19 MR. HILL: Okay.

20 MR. MEW: -- know if there was -- yeah,  
21 anyway.

22 MR. HILL: The could be --

23 MR. MEW: That's --

24 MR. HILL: -- the case.

25 MR. MEW: All right.

1 MR. HILL: Yeah.

2 BY MR. HILL:

3 Q. Okay.

4 Mr. Bostock, you don't have any reason to  
5 believe that these are not accurate bank statements  
6 for the GAL account for the months reflected; do  
7 you?

8 A. No, I don't.

9 Q. Okay. Let me just ask you about some of  
10 these. Like, on this very first page --

11 A. Mm-hmm.

12 Q. There is a couple of expenses. It looks  
13 like ABC is preceding them. Like, I think it says,  
14 "ABC appreciation drinks, and ABC lunch meeting, and  
15 another ABC lunch meeting." Is that -- am I reading  
16 those correctly?

17 A. I don't see ABC drinks, but --

18 Q. What is ABC appreciation? And then there's  
19 a word that begins with a D; do you know what that  
20 is?

21 A. I see ABC lunch meeting, ABC appreciation  
22 dinner, ABC --

23 Q. Can --

24 A. -- lunch meeting.

25 Q. Sorry about that. Dinner, that's the word

1 that I'm talking about. Okay.

2 And then sponsor appreciation?

3 A. AMLI.

4 Q. AMLI? What is AMLI?

5 A. AMLI is an apartment residential company  
6 headquartered in Atlanta.

7 Q. Okay. For the ones that say ABC, why --  
8 why wouldn't these have been paid for out of the ABC  
9 account?

10 A. The reason for the expenditures on the GAL  
11 account would be it was appreciation and retention  
12 efforts for all those hardworking Ambassadors Behind  
13 CASA volunteers. So I, per the MOU understanding,  
14 made those purchases.

15 If you notice the date range, it's during  
16 the month of December. And that was the busiest  
17 time, late November through December, where all of  
18 our Ambassadors Behind CASA were out doing toy  
19 drives. And so in an effort to retain those  
20 volunteers, to keep them coming back every year,  
21 money was spent to retain them.

22 Q. Okay.

23 But since, like, the Ambassadors Behind  
24 CASA had its own account, why wouldn't -- is there a  
25 reason why that money wouldn't have come out of the

1     Ambassadors Behind CASA account?

2             A.     Because I wanted to make sure that money  
3     was available for their use of either -- either  
4     needing to purchase toys or items for the relative  
5     caregivers, and to reward them and try to retain  
6     them through other funds marked and designated as  
7     such.

8             Q.     Okay. And these were people who  
9     volunteered to be an Ambassador Behind CASA?

10            A.     Correct.

11            Q.     Okay. But not to be a Clayton County CASA  
12     volunteer?

13            A.     I believe I had a few in that ambassador  
14     group that did both --

15            Q.     Okay.

16            A.     -- which they had that ability to -- to  
17     pick and choose. And -- but primarily, the majority  
18     of my ABCs were -- were not trained CASA volunteers.

19            Q.     Okay.

20                    Do you know what the -- what looks like a  
21     Verizon Wireless payment? Do you know what that is?

22            A.     That would be for the -- at the time, the  
23     netbooks that we were utilizing at the court. The  
24     old court building did not have Wi-Fi.

25                    And so we had discussed and made a



1 decision to purchase the netbooks so that staff  
2 would have the ability to actually conduct work  
3 while they were either waiting in court or between  
4 hearings.

5 Q. So you --

6 A. So that would be the monthly payment, I  
7 guess, for the --

8 Q. Okay. So -- and the one that says,  
9 "Sponsor Appreciation AMLI," what had AMLI -- had  
10 AMLI -- strike that.

11 Had AMLI donated money to the -- the  
12 board?

13 A. No, AMLI had donated a computer for a  
14 child we had. I can't recall if the child was in  
15 foster care or if the child was in relative care in  
16 custody.

17 Q. Okay. So it was appreciation to AMLI for  
18 donating a computer to a child who was being served  
19 by CASA?

20 A. That is correct. And Georgia CASA was  
21 courting AMLI. It's my understanding AMLI chose a  
22 charitable organization either every quarter or once  
23 a year to support. And so Georgia CASA was courting  
24 them, as well, for hopes that they would choose CASA  
25 as an organization.

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1 Q. Okay. So would the appreciation be, like,  
2 courting a potential future sponsor, as well?

3 A. Correct.

4 Q. Okay. Would -- is there any reason why the  
5 FCCC board should not have paid for that  
6 appreciation?

7 A. It's possible they could have, as well as  
8 the ABCs, but I don't recall.

9 Q. What do you not recall?

10 A. The reasoning that the GAL -- I mean, it  
11 was - I was involved with the company, so --

12 Q. Okay. So since you had the relationship  
13 with the company, that's why you paid for it with  
14 the GAL funds?

15 A. Correct.

16 MR. MEW: Object to form.

17 BY MR. HILL:

18 Q. Could you turn to the third page, which  
19 the Bates Stamp says Clayton-14076.

20 A. Okay.

21 Q. There's some Old Maguire's and a Chili's.  
22 Do you know what these expenses were for?

23 A. It had to have been some type of  
24 recruitment, training, or retention.

25 Q. What -- what -- is Old Maguire's a

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1 restaurant?

2 A. It was. I don't know if it's still in  
3 business.

4 Q. Okay.

5 When you say it would have been for some  
6 recruitment, training, or retention, like, would you  
7 -- recruiting a CASA volunteer, or would you be  
8 recruiting someone to volunteer in some other  
9 capacity?

10 A. We -- we did not recruit Maguire's, but I  
11 do recall making an ask to have a -- an event there.

12 Q. Okay.

13 A. So we did meet with management of the  
14 restaurant, I suppose, and I had some volunteers  
15 with me.

16 Q. What type of event did you want to have  
17 there?

18 A. I think it was going to be a volunteer  
19 appreciation dinner, and they had, like, a banquet  
20 hall.

21 Q. Okay. Chili's -- what about Chili's?

22 A. Chili's would be the same. They -- they  
23 were a sponsor of us, and we did a lot of  
24 activities. They generally hosted one of our Duck  
25 Derby events. And so, therefore, if we were going to

1 do -- if I was going to meet with a potential  
2 volunteer, I would definitely do that in an  
3 establishment that was supporting --

4 Q. Mm-hmm.

5 A. -- our program.

6 Q. There was one -- there's a handwriting  
7 that says, "CC payment to non-profit organization."  
8 Is that your handwriting?

9 A. No, it's not.

10 Q. Do you know whose handwriting that is?

11 A. No, I do not.

12 Q. Is National Cakin -- is that -- I don't  
13 know if I'm saying that right. National Cakin --  
14 Cakin. Is that a non-profit organization?

15 A. I don't recall. It looks like it might be  
16 the Kinship, but --

17 Q. Kinship? What's the Kinship?

18 A. That was a non-profit organization that  
19 worked with relative caregivers, providing services  
20 to the children and the relatives themselves.

21 Q. Do you know what this payment is for? It's  
22 \$330 to -- possibly to the Kinship or National Cake  
23 Inn. Do you know what that's for?

24 A. I don't recall.

25 Q. Okay. Do you know what this IKEA payment

1 was for? The \$15.10 to IKEA?

2 A. Best I can recall, it was for some type of  
3 supply that we needed.

4 Q. Okay. But you don't know specific --  
5 exactly what it is?

6 A. I don't recall.

7 Q. Okay.

8 So on the next page, which is  
9 Bates-stamped Clayton-14075, it looks like more  
10 restaurants, Flavors of Thai, Carrabba's, Chili's,  
11 Dunkin' Donuts. Would -- did you ever take anyone to  
12 a restaurant to try to talk them into becoming a  
13 CASA volunteer?

14 A. Yes, that happened frequently.

15 Q. Okay. Is that what these were for?

16 A. Yes, I -- although, I think Flavors of  
17 Thai or Thai Flavors -- I think that was volunteer  
18 retention for some volunteers that were already in  
19 the program.

20 Q. And so it would be volunteer retention by,  
21 you know, just, like, paying for a meal to show that  
22 you appreciate what they're doing, so hopefully  
23 they'll stick around and keep volunteering; is that  
24 the idea?

25 MR. MEW: Object to form.

1 THE WITNESS: Correct.

2 BY MR. MEW:

3 Q. Okay.

4 On any of the occasions when you did pay  
5 for someone's meal, not for the purpose of retention  
6 but for the purpose of trying to recruit them to  
7 become a CASA volunteer, did that ever work?

8 A. I would certainly say yes.

9 Q. Can you think of anyone today who became a  
10 CASA volunteer after taking them out to lunch or  
11 dinner?

12 A. Not right off, I don't.

13 Q. Can you think of how many times that a  
14 meal expense would have been for trying to recruit  
15 someone to become a CASA volunteer?

16 MR. MEW: Object to form.

17 THE WITNESS: It would be hard to say  
18 because it might -- would depend on whether or  
19 not we were, like, in our Duck Derby planning  
20 stages. Those expenditures might be more  
21 closely related to recruitment of volunteers  
22 for the event.

23 And then certainly, some retention efforts  
24 to maintain those that were assisting for those  
25 types of activities. So it just varies.

1 BY MR. HILL:

2 Q. Okay.

3 If you look at the next page, which is  
4 stamped Clayton-14074. There's some expenses that  
5 say, "Chicago." What -- what is -- what is the  
6 Chicago trip?

7 A. I had attended a national CASA conference.

8 Q. Were -- were you the only person who  
9 attended the national CASA conference?

10 A. From Clayton County?

11 Q. Oh, yeah. Yeah. Yeah, I don't mean like  
12 the only person in the whole country. Were you the  
13 only person from Clayton County CASA that attended?  
14 Sorry.

15 A. To my recollection, yes.

16 Q. Okay. So how would that fit in with  
17 volunteer recruitment, training, or retention?

18 A. Meetings to discuss and get ideas from  
19 other CASA programs from around the country.

20 Q. To get ideas that --

21 A. About --

22 Q. -- for --

23 A. -- recruitment, training, and retention of  
24 volunteers.

25 Q. Okay. Which one are we on? Could you turn

1 two more pages to the bottom? It'll say  
2 Clayton-14068.

3 A. Okay.

4 Q. It says, "Cactus Car Wash expense." Do you  
5 know what that is?

6 A. Yes, as stated on this document, I was in  
7 the gold county vehicle and was needing to go to a  
8 Georgia CASA-mandated meeting for all CASA programs  
9 that they hold once or twice a year.

10 And the car had been due for service, and  
11 so I took the vehicle in. And it had been normal  
12 practice for the county, when they service the  
13 vehicles, that the inmates would wash the vehicle.

14 Q. Mm-hmm.

15 A. And the -- the vehicle was horrible filthy  
16 inside and out, and I could barely even see through  
17 the windshield. And so I took the vehicle to the  
18 carwash because I found out that the county was no  
19 longer washing the vehicle as part of its servicing.  
20 And I wasn't going to take the vehicle home and wash  
21 it myself.

22 So in order to continue with recruitment,  
23 training, and retention efforts, I needed to get to  
24 and from safely.

25 Q. How does washing the car relate to



1 recruiting, training, or retaining volunteers?

2 A. It allowed me to get to the meeting so  
3 that those topics could be discussed and I could  
4 have information from Georgia CASA.

5 Q. What is Brasstown Valley? What is that?

6 A. That was a -- that's a place up in the --  
7 the Foothills. And that was another Georgia CASA  
8 meeting, I believe, or either it was a court  
9 improvement meeting that I attended.

10 Q. Did anyone else from Clayton County CASA  
11 attend?

12 A. I believe Judge Butler may have gone, and  
13 I'm not sure if Concilia Chilumuna had attended.

14 Q. Okay.

15 And is -- the way that this would relate  
16 to volunteer recruitment, training, retention is  
17 that you would get ideas from there that you could  
18 come back and implement --

19 A. Yes.

20 Q. -- at Clayton County --

21 A. Specifically for training.

22 MR. MEW: Make sure --

23 MR. HILL: Okay.

24 MR. MEW: Just again, make sure you let

25 Mr. Hill finish this question, so we have a

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1 good record.

2 THE WITNESS: I apologize.

3 BY MR. HILL:

4 Q. No problem. And what's this McCormick and  
5 something?

6 A. That was a training activity in Atlanta. I  
7 believe it was on human trafficking.

8 Q. And so was that something that you  
9 attended?

10 A. Yes.

11 Q. Anyone else from Clayton County CASA  
12 attend?

13 A. Yes, I believe Annell Graniela -- or  
14 Annell Hudson attended, as well.

15 Q. Okay. Could you turn to one, two, three,  
16 four -- four pages until you see Clayton-14051?

17 A. Okay.

18 Q. There's some handwriting on here that  
19 says, "Georgia CASA Braves tickets."

20 A. Mm-hmm.

21 Q. That's not your handwriting; is it?

22 A. No, it is not.

23 Q. And do you know whose handwriting that is?

24 A. I do not.

25 Q. So was this -- do you remember what this

1 payment was for? This \$312?

2 A. I do.

3 Q. Okay. What was that for?

4 A. Again, being part of the Metro

5 Collaborative, we had arranged to have a CASA

6 Awareness Day with the Braves. And the Metro CASA,

7 the Collaborative, sponsored X number of tickets for

8 all of the volunteers from each of the -- the main

9 counties, again, Clayton, Cobb, DeKalb, Fulton, and

10 Gwinnett.

11 And if we had additional volunteers that

12 wanted to attend, we had to purchase those tickets

13 ourselves. So we received our allocation and had an

14 overwhelming response from our volunteer pool. And

15 so we purchased the additional tickets to make sure

16 all that wanted to attend could attend the event.

17 Q. Okay. So all of these -- the tickets

18 purchased with that went to current CASA volunteers?

19 A. That is correct.

20 Q. Okay. You weren't buying Braves tickets

21 for Georgia CASA staff as an appreciation? That's

22 not what it was?

23 A. No.

24 Q. Okay.

25 Some of these have a little NR next to

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1 them, and then at the bottom, it says, "No backup  
2 documents." I'm thinking the NR means no receipts;  
3 is that --

4 A. I don't know. That's not my handwriting.

5 Q. Okay. Do you know why there -- if there  
6 were no receipts for these expenses, do you know  
7 why?

8 A. I do not. My program assistant would help  
9 facilitate processing the information, and so I  
10 don't know.

11 Q. One of the expenses says, "Last Resort  
12 Grill," and it's in Athens, Georgia; do you see that  
13 one?

14 A. Mm-hmm.

15 Q. Do you know what that was for?

16 A. I actually -- I don't know specifically,  
17 but I did meet with the owner of Last Resort, who  
18 also reside -- has a home in Atlanta, and I believe,  
19 has a restaurant in Atlanta. And I was hoping to  
20 recruit him as a -- hopefully, a sponsor or a donor  
21 for the program.

22 Q. Okay. Do you know what this Lowe's expense  
23 of \$321.40 was for?

24 A. I don't recall.

25 Q. What types of things would you get from,

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1 like, Lowe's or Home Depot that would be related to  
2 volunteer recruitment, training, or retention?

3 A. The first thing that comes to mind would  
4 be possibly the need for something related to Duck  
5 Derby.

6 Q. Like what? Like what would -- what would  
7 you get from a place like that related to Duck  
8 Derby?

9 A. Well, each year, we had to construct the  
10 racecourse. And over the course of the previous  
11 year, where -- where the items were stored, they may  
12 be damaged and need to be replaced. We wouldn't know  
13 it until the last minute when the course was being  
14 set up.

15 Q. Okay. So, like, building materials for the  
16 course --

17 A. Mm-hmm.

18 Q. -- or something like that? Okay.

19 A. So that we would have our CASA Awareness  
20 Day at the event.

21 Q. Okay. Could you turn a couple more pages  
22 to Clayton-14034?

23 A. I'm sorry. Can you repeat the page?

24 Q. 14034.

25 A. Okay.

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1 Q. It's a Dollar General expense. Do you have  
2 any idea what that would be?

3 A. I believe it would have either been some  
4 supplies for the ABC Toy Donation Drives they were  
5 holding, given the date being December 3rd.

6 Q. What kind of supplies would you get from  
7 Dollar General?

8 A. It may have been toys or if they need  
9 signage, poster board, markers.

10 Q. So wouldn't it have been more appropriate  
11 for the ABC to spend its own account for something  
12 like that?

13 MR. MEW: Object to form.

14 THE WITNESS: Well, it would depend on the  
15 situation and the -- the timing. If it was a --  
16 a rush to get them materials or the supplies  
17 and I was available.

18 BY MR. HILL:

19 Q. So did that happen sometimes? There would  
20 be a rush to get materials or supplies, and so you  
21 would expense it from the GAL account when maybe it  
22 should have come from the ABC account?

23 MR. MEW: Object to form.

24 THE WITNESS: If I felt that it fell  
25 within the terms of the MOU.

1 BY MR. HILL:

2 Q. Okay. Would the ABC account ever reimburse  
3 you for something like that?

4 A. They did. One time, for their annual  
5 Christmas Luncheon, they had met at, I believe,  
6 Costco. Excuse me. And they had, I'm guessing, at  
7 least six buggies full of food items, and they did  
8 not have, apparently, their debit card.

9 And their option was to have to put all  
10 the food back because, apparently, Costco would not  
11 allow them just to leave it and then come back to  
12 pay for it.

13 Q. Mm-hmm.

14 A. So I agreed to put it on my personal  
15 credit card. And at the same time, this was  
16 happening, the ABCs had received the Children's  
17 Charity Grant of \$500 from Atlanta Motor Speedway.

18 And two of the board members and also ABC  
19 members said that if I were to keep them from having  
20 to put all the food back and then come back and shop  
21 again, that they would have the \$500 Children's  
22 Charity check deposited into the GAL. And then --  
23 then I could get that money reimbursed to myself.

24 Q. Okay.

25 Up here, I don't think this is your

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1 handwriting, but it says -- there's something -- a  
2 note that says, "Written to GB." Do you see that, by  
3 the \$45.51 amount?

4 A. Correct. That is not my writing.

5 Q. Right. Do you recall if there was some  
6 check written to you from the GAL account in that  
7 amount?

8 A. I don't recall.

9 Q. Okay. So no idea what that would have been  
10 for?

11 A. No.

12 Q. I'm going to show you what I'm marking as  
13 Defendant's Exhibit 6.

14 A. Okay.

15 (Exhibit Number 6 marked for  
16 identification.)

17 BY MR. HILL:

18 Q. And I'll represent these are additional  
19 bank statements for the GAL account from the year  
20 2012. And you don't have any reason to dispute the  
21 accuracy of these bank statements; correct?

22 A. That's correct.

23 Q. Okay. If you could go to the second page,  
24 which is stamped Clayton-14027.

25 A. Okay.



1 Q. In the -- about the middle, there is a --  
2 well, first, this is a -- this is your handwriting  
3 in the lower half of the page? It says like, "Lunch  
4 staff volunteer after Superior Court case," and all  
5 of those below." Is that your handwriting?

6 A. Those entries, yes.

7 Q. Okay. The third one down, "Lunch meeting,  
8 prospective board member." Do you see that?

9 A. Mm-hmm.

10 Q. "Olive Garden." So that's a -- a lunch  
11 meeting with someone you were trying to recruit to  
12 become a member of the board of FCCC?

13 A. That's correct. And board members were  
14 considered volunteers.

15 Q. They were not CASA volunteers, though;  
16 right?

17 A. Yes, they were considered CASA volunteers.

18 Q. Okay.

19 Well, they did not get paid for being on  
20 the board, but they were not court-appointed special  
21 advocates; right?

22 A. Some of the board members would actually  
23 go through the training and work in the courtrooms.  
24 Some opted just to volunteer as a board member, so  
25 we counted them as volunteers in our numbers.

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1 Q. Okay. Do you remember who this board --  
2 prospective board member was?

3 A. I don't.

4 And if I may backup, it's possible that  
5 was Andrea Fann.

6 Q. Mm-hmm.

7 A. She was the business manager -- or office  
8 manager for Orthopaedic South in Morrow, and  
9 actually was -- their offices were right next door  
10 practically to the Olive Garden.

11 Q. Okay.

12 A. So it's possible that it was Ms. Fann.

13 Q. Okay. Is there any reason why you would  
14 use the GAL funds for that as opposed to the FCCC  
15 board funds?

16 A. Because that was a prospective volunteer  
17 that I was recruiting and had been developing a  
18 relationship with to get her to agree to come onto  
19 the board.

20 Q. Did Andrea Fann become a court-appointed  
21 special advocate?

22 A. She did.

23 Q. She did? Okay.

24 A couple of lines down, I think it says,  
25 "Program camera." Am -- am I reading that correctly?

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1 A. Yes, that's correct.

2 Q. What was that camera expense for?

3 A. That camera was expense -- we -- we had  
4 been using the court camera, and I don't remember  
5 what the shape of that camera had been. But we felt  
6 like it was important to document via photos a lot  
7 of our recruitment, retention, and training events  
8 so that we could use it as awareness -- public  
9 awareness about CASA.

10 Q. So you could put it on, like, a -- like,  
11 the website? Something like that?

12 A. Correct.

13 Q. Okay. And then doing that would what?  
14 Encourage more people to donate money or attend  
15 future events; is that --

16 A. Correct.

17 Q. -- the idea?

18 A. Very similar to everyone getting a chuckle  
19 out of the Duck Derby events with the duck  
20 incorporated into the name. The visual is -- is  
21 powerful.

22 Q. The last one, "Last Call," it says, "Lunch  
23 meeting at airport prior to departure to San Juan."

24 A. Yes.

25 Q. What is the -- what was that lunch meeting

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1 about?

2 A. Training.

3 Q. Okay. Well, who was at the lunch meeting?

4 A. Teske was present, as was Annell Graniela.

5 Q. Okay. And you all discussed the training  
6 of CASA volunteers; is that what you're saying?

7 A. Correct.

8 Q. Do you remember specifically what you  
9 discussed?

10 A. Some of our projects and ways that we  
11 might -- could improve numbers of volunteers.

12 Q. Okay.

13 So it wasn't just expensing because we're  
14 going out of town, and let's just put it on the GAL  
15 funds account? Not like that?

16 A. No.

17 Q. Okay. Did you ever do that?

18 A. What's your question?

19 Q. Well, did you --

20 A. I'm sorry.

21 Q. Did you ever use the GAL account debit  
22 card for something that was not volunteer  
23 recruitment, training, or retention?

24 A. No.

25 Q. Okay.

1           The -- I believe it's the next page. It's  
2 Clayton-14022. It's the very last one. It says,  
3 "F.R.O.G.S., Atlanta, Georgia." And there's some  
4 handwriting that says, "Restaurant bar, alcohol  
5 only." Do you see that?

6           A.    I do.

7           Q.    And that's not your handwriting; right?

8           A.    No, it is not.

9           Q.    Would -- do you recall what this expense  
10 was and if it was just alcohol only?

11          A.    I had several meetings at F.R.O.G.S. with  
12 potential volunteers and sponsors because of its  
13 location. And I want to say that this -- given the  
14 date, I had a meeting with -- her name was Jennifer  
15 King with Turner Broadcasting.

16                   And then there was a patient service  
17 representative that Jennifer was friends with, and  
18 that individual attended, as well. And that was part  
19 of a recruitment effort.

20          Q.    Okay. Do you recall if any of those people  
21 became CASAs?

22          A.    I don't, but if you look at the timeline,  
23 I didn't really have the opportunity to see a lot of  
24 the results of my efforts to recruit.

25          Q.    Why not? What do you mean?

1 A. Because I was terminated.

2 Q. Well, this is 2012 there; right?

3 A. Correct.

4 Q. Okay.

5 Would -- well, when you're recruiting a  
6 volunteer, are you saying it would take more than a  
7 year of trying to recruit someone to become a CASA?

8 A. It could if you consider, for example,  
9 that Turner Broadcasting probably has a thousand  
10 employees.

11 Q. Mm-hmm.

12 A. Those decisions don't happen overnight. It  
13 is a process, and it does take time.

14 Q. And are -- you're talking about people  
15 becoming CASAs, or do you mean, like, building some  
16 relationship where they're donating money to  
17 fundraising events, or both?

18 A. I'm -- I'm referring to both, yes.  
19 Recruitment, as I stated earlier, is relationship  
20 building, and sometimes that takes time.

21 Q. So you're saying, like, had you not been  
22 terminated, it's possible that this could have  
23 worked out to where you got even more CASA  
24 volunteers --

25 MR. MEW: Object to form.

1 BY MR. HILL:

2 Q. -- from efforts like these?

3 A. I absolutely believe that, and I can give  
4 you a couple of examples. Aon Hewitt in Cobb County  
5 because of -- not initially, but because of my  
6 efforts to continue working with that company out of  
7 Cobb County, we developed a very strong relationship  
8 that took time. And they worked with us every year  
9 and also worked with the Collaborative.

10 I can also give you the example of  
11 Sutherland Law Firm. One of my very best volunteers,  
12 Lovette Bennett, lived in McDonough, Georgia,  
13 volunteered for us in Clayton County. And she worked  
14 in Midtown at Sutherland.

15 And through our relationship, we developed  
16 a relationship with her company who not only helped  
17 with CASA awareness but also made financial  
18 donations to our Collaborative.

19 I was also beginning to court Heery  
20 Corporation, which is an architecture firm, I  
21 believe practically next door to Sutherland. And we  
22 were well on our way for building that relationship,  
23 as well.

24 Q. Did -- so the ones you just mentioned, Aon  
25 Hewitt, Lovette Bennett, and starting to court the

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1 Heery Corporation, did this result in any new CASAs  
2 coming and joining the program?

3 A. Again, I -- I wasn't able to find out the  
4 end result, but I have every belief that it would  
5 have. My contacts and connections to Heery were  
6 through softball.

7 Q. Okay. So someone played on the softball  
8 team at Heery?

9 A. Not on -- not on a team in the HSL, but in  
10 a business league.

11 Q. Oh, okay. So were you involved in a -- a  
12 -- a softball league other than HSL?

13 A. Yes, I was.

14 Q. During the time that you worked for  
15 Clayton County?

16 A. It was immediately thereafter, but I had  
17 already signed up. It was a -- a -- if you will, a  
18 minor league, sort of, to the HSL. It's known as  
19 SSL, which is the Southern Softpaw League, and it's  
20 a charitable league, all-inclusive.

21 And they actually played at SouthPark in  
22 Clayton County, right next to where Scott Antique  
23 Market is now located. And that league played there  
24 for eight years. I played there two seasons.

25 Q. And you said it was shortly after you



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1 started, like back in 2003?

2 A. Yeah, I -- I was playing with Hotlanta  
3 Softball League, which what -- they referred to that  
4 as the -- the spring league.

5 Q. Okay.

6 A. SSL is what's known as fall ball.

7 Q. Fall ball.

8 A. So it's played in the fall. So I started  
9 in probably September.

10 Q. Is that -- does -- SSL, is that, like,  
11 identified as a gay softball league?

12 A. Probably more than 70 percent of the teams  
13 in HSL play in SSL.

14 Q. Okay.

15 I just didn't know if it, like, advertises  
16 itself as, this is a gay softball league, or --  
17 because you mentioned earlier, I think, just like a  
18 business league. I wasn't sure if it has, like, some  
19 designation that it puts out to the public.

20 A. Again, most of the teams in HSL and  
21 players, which is predominantly gay, play in the  
22 SSL.

23 Q. Okay.

24 But just because gay people might play in  
25 the league doesn't mean it's, like, a gay softball

1 league. I'm just saying, like, Hotlanta Softball  
2 League advertises itself as, this is a gay softball  
3 league; is that right?

4 A. Correct.

5 Q. Okay. Does SSL do that, also?

6 A. Not on the same level as HSL, but I think

7 --

8 Q. Okay.

9 A. -- to your question, most people associate  
10 it as a gay --

11 Q. Okay.

12 A. -- softball league.

13 Q. And so you started playing with HSL when?

14 A. In January of 2013.

15 Q. 2013. Okay.

16 And you made contacts, like the Heery  
17 Corporation contacts, through S -- playing with SSL?

18 A. HSL.

19 Q. Oh, I'm sorry. You started playing with  
20 HSL in January of 2013; right?

21 A. Correct.

22 Q. Okay. SSL, Southern Softball League, when  
23 did you play with them?

24 A. That would have started in either August  
25 or September, I believe, of 2013.

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1 Q. Oh, okay.

2 You didn't play for them while you were --  
3 for SSL, you did not play with that league while you  
4 were employed with Clayton County; right?

5 A. Correct. I may have submitted my  
6 application to play in the SSL, but the season had  
7 not started yet for SSL.

8 Q. Okay. And you didn't expense any kind of  
9 money for SSL from the GAL account; right?

10 A. No, I did not.

11 Q. Okay.

12 Did you pay for anything yourself  
13 out-of-pocket for SSL while you were a Clayton  
14 County employee?

15 A. No.

16 Q. Okay.

17 A. I don't believe there was a registration  
18 fee or that if it was, I would have paid for that  
19 out of my own pocket once I started with the actual  
20 league.

21 Q. Okay. But just to back up for a second,  
22 you said your contact for the Heery Corporation --

23 A. Mm-hmm.

24 Q. -- that came from playing with SSL?

25 A. No, it came from my involvement with HSL.

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1 Q. Got it. Okay. Okay.

2 Any other softball leagues you played for  
3 while you were working for Clayton County?

4 A. No.

5 Q. Okay. Can you turn two -- two more pages  
6 to Clayton-14019? There's a few more Verizon  
7 Wireless charges. I think you mentioned some were  
8 for a netbook; is that right?

9 A. Three netbooks.

10 Q. Three -- three netbooks. Okay. Is that  
11 what these are for?

12 A. Yes.

13 Q. Okay. Do you know what the Joe's on  
14 Juniper's expenses is in the middle of the page?

15 A. Again, based on the date and my  
16 recollection, I am thinking that was a part of a  
17 recruitment and retention effort with a volunteer  
18 from CNN.

19 Q. Okay. A volunteer for -- do you know what  
20 this person was going to volunteer to do?

21 A. Yes, he was going to volunteer as a male  
22 model for the Luncheon and Fashion Show that Georgia  
23 CASA hosted. And he would consider himself an expert  
24 on human trafficking, especially as it related to  
25 children because he was a journalist.

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1 Q. Okay. He wasn't going to be a CASA; was  
2 he?

3 A. I was hoping at -- at best, I was hoping  
4 that he would have become and -- and feel confident  
5 that he would have become a CASA guardian.

6 Q. Okay. Could you go to that next page,  
7 which is Clayton-14149? There's a couple -- this is  
8 your handwriting on this page; right?

9 A. That is correct.

10 Q. Does that say, "COPS donation and COPS  
11 reception?" Is that what that says?

12 A. It does.

13 Q. What is that?

14 A. COPS is an acronym for Council of  
15 Programs. I stated earlier that there was a  
16 mandatory Georgia CASA meeting held a couple of  
17 times a year, and that was for -- that's what that  
18 is, COPS.

19 Q. Okay. How would that relate to volunteer  
20 training, recruitment, or retention?

21 A. Because that's what those meetings focused  
22 on every time we met, all three categories.

23 Q. So giving you, like, best practices and  
24 ideas that you can take back to your organization to  
25 implement?

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1 A. Correct.

2 Q. Okay.

3 A. And sometimes maybe marketing supplies.

4 Q. Okay. This other one says, "Gift cards,  
5 DFCS foster parent appreciation." Is that what that  
6 says?

7 A. I think it's association.

8 Q. Association. Okay. What are these gift  
9 cards for?

10 A. They held a -- I believe, an annual event  
11 for their foster parents. And we, meaning the CASA  
12 Program, were always invited. And not only our  
13 program but our court had a very close relationship  
14 with DFCS.

15 Q. Mm-hmm.

16 A. And we often worked, you know,  
17 hand-in-hand with foster parents, and of course,  
18 their children. So we made that donation during  
19 their annual event to not only show appreciation but  
20 to also let our volunteers know that we were  
21 appreciating their hard work on these cases and  
22 trying to retain our volunteers.

23 Q. But the gift card is going to foster  
24 parents?

25 A. Correct. But as I recall, we had

1 volunteers present during the event.

2 Q. Okay. But no volunteers -- no CASA  
3 volunteers received the gift cards; is that right?

4 A. That would be my understanding, but again,  
5 building relationships falls under recruitment.

6 Q. Okay.

7 If you would go two more pages in,  
8 Clayton-14152. There is one for F.R.O.G.S. that  
9 says, "Duck Derby sponsor meeting." And that's your  
10 handwriting; right?

11 A. That is correct.

12 Q. So this would be a meeting for people --  
13 for people who were sponsoring the Duck Derby; is  
14 that right?

15 A. It would be. And it was for -- there were  
16 about 12 people present. Duck Derby was discussed,  
17 and we were actually in Atlanta. Again, referencing  
18 the date --

19 Q. Mm-hmm.

20 A. -- there is a -- or used to be an annual  
21 boxcar race down Piedmont. And the Ambassadors  
22 Behind CASA were considering, in addition to working  
23 -- helping us with Duck Derby and their toy drives,  
24 that they were considering doing the boxcar race for  
25 the next -- excuse me -- for the next year.

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1 Q. The boxcar race wasn't a CASA event; was  
2 it?

3 A. The event itself wasn't, but they were  
4 going to enter some kind of duck boxcar.

5 Q. Okay. And that Chamber of Commerce lunch  
6 staff expense down at the bottom, Chili's, what was  
7 that for?

8 A. We participated and were members of the  
9 Clayton County Chamber of Commerce, and we attended  
10 all of their ribbon cuttings. And I'm assuming we  
11 went with the -- the staff that had attended and  
12 possibly somebody from the business that had the  
13 ribbon cutting.

14 Q. So how does that relate to CASA volunteer  
15 recruitment, training, and retention?

16 A. Because at every single Chamber event, we  
17 talked about CASA to people that were attending the  
18 event, to people that had businesses. Community  
19 members would sometimes show up to show support for  
20 whatever business would -- had the ribbon-cutting  
21 ceremony. So we were always trying to recruit.

22 Q. Do you know if you got any CASA volunteers  
23 from this meeting?

24 A. I believe we may have secured a -- a  
25 sponsor.



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1 Q. Okay. So a sponsor, like someone to donate  
2 money to the FCCC board or --

3 A. Mm-hmm.

4 Q. -- to sponsor a duck or something like  
5 that?

6 A. Or to sponsor the children or toy drives  
7 at Christmas.

8 Q. Okay. Sponsoring the toy drives; is that  
9 what you --

10 A. Mm-hmm.

11 Q. Okay.

12 A. Yes.

13 Q. Could you turn, I think, about four or  
14 five pages to Clayton-14155? It looks like there is  
15 a lot of Duck Derby expenses on this one. This is  
16 your handwriting; right?

17 A. That is correct.

18 Q. What's that top one? Duck Derby something  
19 meeting, what does that say?

20 A. Preparation meeting.

21 Q. Okay.

22 And then another Duck Derby prep meeting  
23 and sponsor meeting below that; right?

24 A. Yes.

25 Q. What is, "Easel for poster?" Is that what

1 that says?

2 A. It is.

3 Q. Was that something for the Duck Derby? The  
4 easel?

5 A. Yes, we had a -- some kind of laminated --  
6 I can't recall if it was a National CASA image with  
7 a child or if it was an actual Duck Derby  
8 advertisement, but it was an advertisement for CASA  
9 for awareness.

10 Q. Okay. So since the FCCC board put on the  
11 Duck Derby, why weren't they paying for these  
12 expenses?

13 MR. MEW: Object to form.

14 THE WITNESS: I felt it was important for  
15 community awareness and recruitment.

16 BY MR. HILL:

17 Q. Okay. It would have been appropriate for  
18 the FCCC board to pay for them; right?

19 MR. MEW: Object to form.

20 THE WITNESS: It may have. I don't know  
21 how long that would have taken.

22 BY MR. HILL:

23 Q. The thing that I'm kind of struggling with  
24 is that something like the Duck Derby, it raises  
25 money. It seems to have a good purpose. But the

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1 money goes to the FCCC board. And they get that  
2 money, but expenses like this for putting on an  
3 event seems to be coming from the GAL account.

4 And so it's like a one-way path where  
5 money is leaving the GAL account, and then the  
6 fruits of that labor are going into the board  
7 account. I mean, doesn't that seem kind of weird?

8 MR. MEW: Object to form.

9 THE WITNESS: I don't think it's weird at  
10 all. I -- as long as I'm applying to the terms  
11 of the MOU for recruitment, training, and  
12 retention of, at that time, my volunteers and  
13 my program, if I felt that it was appropriate.

14 BY MR. HILL:

15 Q. Did you ever think it felt like you were  
16 raising money for the FCCC board?

17 MR. MEW: Same objection.

18 THE WITNESS: Not at all. And I can tell  
19 you that the FCCC spent a lot of money, of  
20 their money, on our volunteers, and on our  
21 program.

22 BY MR. HILL:

23 Q. Mm-hmm. Which is what they were supposed  
24 to do; right? Because they are supposed to be  
25 supporting your program; right?

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1 A. Correct.

2 Q. Did you ever say, why don't -- to the  
3 board members, did you ever say, why aren't you guys  
4 spending money for, you know, building supplies for  
5 the Duck Derby and these meetings with sponsors?

6 MR. MEW: Object to form.

7 THE WITNESS: They did have expenditures  
8 for those same items.

9 BY MR. HILL:

10 Q. Okay.

11 But not these ones, at least. I'm just  
12 asking, did you ever say, GAL account really  
13 shouldn't be paying for this? The board, this is  
14 your event, you should really be paying for it. Did  
15 you ever do that?

16 MR. MEW: Object to form.

17 THE WITNESS: I recall some conversations  
18 about GAL versus FCCC, but I -- I don't recall  
19 any specific.

20 MR. HILL: Okay.

21 Could you turn a couple of pages to  
22 Clayton-14 -- I think it's 14158. It could be  
23 14458. There's some print that's overlapping,  
24 making it hard to read. The -- the date on the  
25 top is 11/07/2012.

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1 MR. MEW: Hey, Michael.

2 MR. HILL: Yeah.

3 MR. MEW: When you close out this exhibit,  
4 would you mind if we take a break? It's been a  
5 --

6 MR. HILL: Of course.

7 MR. MEW: -- little bit. Thanks.

8 MR. HILL: Yeah, I'm getting near the end  
9 of this one, so that will be just a second.

10 BY MR. HILL:

11 Q. This is your handwriting on this page?

12 A. Yes, it is.

13 Q. Okay. There's another gift card and gift  
14 donations, Bubbles and Publix. Do you know what --  
15 what those were for?

16 A. That was for the Metro Collaborative  
17 Superhero 5k Run.

18 Q. So was this -- the gift card a donation  
19 that you were making from the GAL account to the  
20 Metro Atlanta CASA 5K Run?

21 A. For the purposes of that card being given  
22 to an individual participating in the 5K run, yes,  
23 as it relates to recruitment and CASA awareness.

24 Q. But the Metro Atlanta 5K Run, that's  
25 recruiting people -- potentially, recruiting

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1 volunteers for all the CASA programs in the Metro  
2 Atlanta area; right?

3 A. That is correct.

4 Q. Do you know if the other CASA -- other  
5 local CASA programs also expensed money towards the  
6 Metro Atlanta CASA Program?

7 A. I would venture to say yes to that. I  
8 believe we were asked to donate the -- the gift  
9 cards.

10 Q. When you say were asked, what do you mean?

11 A. By the Metro Collaborative, for each  
12 program participating to --

13 Q. Okay.

14 But I know what -- in the MOU, I know we  
15 go on about, like, volunteer recruitment, training,  
16 and retention. It means for people who are CASA  
17 volunteers in Clayton County; right?

18 MR. MEW: Object to form.

19 THE WITNESS: It doesn't say that in the  
20 MOU. It -- it says to be spent on the purposes  
21 of recruitment, training, and retention.

22 BY MR. HILL:

23 Q. So if you are spending money for the  
24 purpose of recruiting, training, or retaining CASA  
25 volunteers in DeKalb County, would you think that

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1 would be within the scope of the MOU?

2 MR. MEW: Same objection.

3 THE WITNESS: As it relates to impacting  
4 Clayton County CASA, yes, because there might  
5 be a training class sponsored by Metro  
6 Collaborative CASA in DeKalb County, and  
7 Clayton County may have four or five  
8 individuals in that training class --

9 BY MR. HILL:

10 Q. Mm-hmm.

11 A. -- or there may be a resident of DeKalb  
12 County that chose to do their volunteer work in  
13 Clayton County. So it is very feasible.

14 Q. Okay.

15 But generally, you would not want to use  
16 GAL funds to recruit a CASA volunteer to the -- the  
17 DeKalb County CASA Program, if there is one; right?

18 MR. MEW: Object to form.

19 THE WITNESS: There is a -- yes, a DeKalb  
20 County CASA Program.

21 BY MR. HILL:

22 Q. Okay.

23 A. My recruitment efforts focused on Clayton  
24 County.

25 Q. Mm-hmm.

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1           A.     But if that meant that a prospect decided  
2     to volunteer with DeKalb County, for whatever  
3     reason, whether it was where they worked, where they  
4     lived --

5           Q.     Mm-hmm.

6           A.     -- didn't want to do it in the same county  
7     where they lived, which was the case sometimes. As  
8     long as that person agreed to do it and go through  
9     the training because that meant another child was  
10    impacted by those services that CASA volunteers  
11    would bring into the courtroom.

12          Q.     Okay.

13                 So if I understand what you're saying, it  
14    would be within the scope of the MOU as long as it  
15    supports the CASA program -- any CASA -- as long as  
16    it supports any CASA program --

17                 MR. MEW: Object to form.

18    BY MR. HILL:

19          Q.     -- even if it's not Clayton County?

20          A.     I don't believe that's how I responded.  
21    And, again, my primary focus was recruitment for  
22    Clayton County.

23          Q.     Right.

24          A.     But in that process, like I said, using  
25    the -- DeKalb County as an example, someone might



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1 change midway through the training and decide they  
2 were going do it in one county. And now, they've met  
3 maybe the staff from other counties, and they prefer  
4 to go to that county.

5 So my goal was to recruit as many people  
6 as we could. And it was successful. We had one of  
7 the largest, if not the largest, CASA volunteer  
8 programs in the state of Georgia because of our  
9 recruitment, training, and retention efforts.

10 Q. Okay. You wouldn't use the GAL account to  
11 recruit someone to become a CASA volunteer in  
12 Tennessee; right?

13 A. No.

14 Q. Okay. But other counties in Georgia, you  
15 might?

16 MR. MEW: Object to form.

17 THE WITNESS: Not intentionally. It might  
18 happen if that prospect changed their mind or  
19 never revealed, for whatever reason, that they  
20 were not going to proceed becoming a volunteer  
21 for Clayton County.

22 MR. HILL: Okay. Okay.

23 MR. MEW: Let's take a break.

24 THE VIDEOGRAPHER: The time is 3:06. We  
25 are going off the video record.

1 (A break was taken.)

2 THE VIDEOGRAPHER: We are back on the  
3 video record. The time is 3:28.

4 BY MR. HILL:

5 Q. Mr. Bostock, I'm not going to go through  
6 these ones in as much detail. I just want to get you  
7 to identify something. This is -- I'm going to mark  
8 this as Defendant's Exhibit 7 right here. Okay.

9 Okay. And so these appear to be bank  
10 statements for the GAL account in 2013. It looks  
11 like the months of January, February, March, and  
12 April. Do you have -- have any reason to dispute the  
13 accuracy of these bank statements?

14 A. No.

15 (Exhibit Number 7 marked for  
16 identification.)

17 BY MR. HILL:

18 Q. Okay. And this is your handwriting on the  
19 first three pages and the last two entries on the  
20 last page?

21 A. On the first page, there's some  
22 handwriting that I'm not familiar with.

23 Q. Is that --

24 A. That is not mine.

25 Q. Is that where it says, "Rest, Bar, Blake's

1 on the Park?" That's not your handwriting?

2 A. No, it's not.

3 Q. Okay. And then, "Softball league," down at  
4 the bottom. Is that your handwriting?

5 A. No, it's not.

6 Q. Okay. But all the rest of it is?

7 A. Well, there's two entries on -- the last  
8 two -- yeah, it's softball league, those are not my  
9 handwriting.

10 MR. MEW: And I'm sorry, just for purposes  
11 of the record, did you -- did I'm sorry. Did  
12 the witness say what appears to be a sticky  
13 note?

14 BY MR. HILL:

15 Q. The stick -- yeah. What appears to be a  
16 sticky note, is that your handwriting?

17 A. No, it is not.

18 Q. Okay. Got it.

19 A. And on the back page, there are additional  
20 notes that are not my handwriting.

21 Q. And that's the top two -- the first two  
22 entries on the back page?

23 A. That is correct.

24 Q. Got it.

25 Okay. So these last -- this one and the

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1 previous two exhibits, it looks like the GAL account  
2 started off 2011 with about \$1,200 in it. And then  
3 started off 2012 with about \$3,300, roughly. In  
4 2013, with about \$2,300, approximately; is that  
5 correct?

6 A. It appears so, yes.

7 Q. Okay.

8 And is that consistent with the -- the  
9 whole time you worked at Clayton County, that -- is  
10 that amount in the 2 to 3,000 range, typically, what  
11 the GAL account had in it?

12 A. As I recall, yes.

13 Q. Okay. I'm going to show you what I'm  
14 marking as Defendant's Exhibit 8.

15 And if you'll notice, compared to the  
16 other previous three exhibits, the last four digits  
17 of the account number of this one are different. And  
18 so would I be correct in saying this is the -- these  
19 would be bank statements for the FCCC board account  
20 as opposed to the GAL account?

21 A. I'm assuming so, especially since the top  
22 does not indicate DBA guardian ad litem account.

23 (Exhibit Number 8 marked for  
24 identification.)

25 BY MR. HILL:

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1 Q. Okay.

2 And so looking at these three pages, it  
3 looks like the FCCC board account started off 2011  
4 with about \$16,000. And the next page is 2012  
5 January, starting off with around \$17,000. And then  
6 in January of 2013, the last page, it's about  
7 approximately \$33,000. Do you see all that?

8 A. I do.

9 Q. Okay.

10 So the FCCC board account, you know, at  
11 least from 2011 to 2013, you know, almost doubled;  
12 correct?

13 MR. MEW: Object to form.

14 THE WITNESS: Well, yes, and my  
15 explanation for that would be that the 14th  
16 Annual Darlin' Duck Derby had occurred the last  
17 Saturday in September. So they were still  
18 processing, and they would normally see an  
19 influx of money after that event.

20 BY MR. HILL:

21 Q. The last Saturday in September of every  
22 year --

23 A. 20 --

24 Q. -- that happens?

25 A. Correct.

1 Q. Okay.

2 A. The 14th Annual was September of 2012.

3 Q. Was that an unusually large Duck Derby, as  
4 far as money coming in?

5 A. That was one of our more successful.

6 Q. Okay.

7 And so you're saying that would be a  
8 reason why the January 2013 statement has so much  
9 more money compared with the January statements for  
10 2011 and 2012?

11 A. Correct.

12 Q. Okay. Okay. I'm showing you Defendant's  
13 Exhibit 9. And you've seen this document before;  
14 correct?

15 A. Yes, I have.

16 (Exhibit Number 9 marked for  
17 identification.)

18 BY MR. HILL:

19 Q. Okay.

20 And this would be -- I think this has been  
21 referred to as interrogatories that you received  
22 from John Johnson in May 2013; is that right?

23 A. Correct.

24 Q. Okay. Do you recall receiving this?

25 A. I do.

1 Q. And did you -- did you discuss this  
2 document with John Johnson or anyone else when you  
3 received it?

4 A. No, as I recall, it was presented to me,  
5 and I was given a deadline, and then Mr. Johnson  
6 walked away.

7 Q. Okay. Did you ask anybody -- anyone else  
8 -- like any -- or did you ask anybody at all, like,  
9 what it was about?

10 A. I don't recall. I -- Mr. Johnson may have  
11 said as a result -- as it -- as a result of the  
12 audit, but I'm not exactly sure.

13 Q. Okay. Was it unusual for you to get a  
14 document like this?

15 A. Yes.

16 Q. Okay. What did you think when you received  
17 that memo with the questions?

18 A. When I read Number 10, that's when it hit  
19 me that the county administration was not happy that  
20 I had joined the Hotlanta Softball League to recruit  
21 potential volunteers and sponsors because the league  
22 identified as gay.

23 Q. Did you talk with anyone about that  
24 feeling or realization that you came to?

25 A. I believe in passing with Debbie Stinson

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1 and briefly with Carol Gossett, I told them that  
2 they were going to try to fire me because I'm gay.

3 Q. So you think you told Debbie Stinson that  
4 you believed you were about to be terminated because  
5 you're gay?

6 A. Mm-hmm.

7 Q. Do you remember where this occurred?

8 A. In the CASA offices at the new court  
9 building.

10 Q. What did Debbie Stinson say in response?

11 A. You're not going to get fired.

12 Q. Was anything -- did anything else  
13 transpire in that conversation?

14 A. The -- there was a brief conversation. As  
15 you may recall, I had stated I was the victim of a  
16 hit-and-run in April. And that case had been -- I  
17 guess it had been resolved.

18 And I was in the position to look for  
19 another vehicle to replace my vehicle. And had -- in  
20 previous conversations with Debbie, had mentioned to  
21 her that I had found a truck that I was interested  
22 in and that I might be buying it that weekend. And  
23 she reached out, and put her hands on me and said,  
24 don't you dare buy anything.

25 Q. Any idea why she said that?



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1           A.     I assumed she knew something and wasn't  
2 willing to tell me.

3           Q.     So are you saying that you believe that  
4 she knew you were going to be fired? Is that what  
5 you're saying?

6           A.     Yes.

7           Q.     Okay. But she told you, you were not going  
8 to get fired?

9           A.     That is correct.

10          Q.     Okay.

11                   Did that happen -- this conversation about  
12 the -- possibly buying a truck, did that happen  
13 before or after the conversation where you told  
14 Debbie Stinson you think you're about to get fired?

15          A.     It was the same conversation.

16          Q.     Oh, okay.

17                   So when she said, don't buy anything, you  
18 interpreted that as meaning don't buy anything  
19 because you're about to get fired; is that what  
20 you're saying?

21          A.     Or that something was about to happen.  
22 That was the Friday, as I recall, before I was  
23 terminated on that Monday.

24          Q.     Okay.

25                   So what did you say when she told you,

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1 you're not going to get fired?

2 A. I don't recall saying anything because --  
3 other than I was most likely going to go back to the  
4 dealership on -- over the weekend and purchase the  
5 pickup truck.

6 Q. Did she --

7 A. And then she gave her response.

8 Q. Oh. And did you go and purchase the pickup  
9 truck at that time?

10 A. No, I did not.

11 Q. Okay. Did you not purchase it because  
12 Debbie Stinson told you not to buy it?

13 A. Because, again, reading Question Number 10  
14 and the way Debbie Stinson -- just her general  
15 demeanor, I, again, felt like something was about to  
16 happen.

17 Q. Okay. So tell me about the conversation  
18 with Carol Gossett that you just referred to.

19 A. It was similar. I had mentioned that I  
20 felt as though the court administration did not  
21 approve of my joining the Hotlanta Softball League  
22 and basically recruiting within the league and  
23 trying to bring in additional volunteers, sponsors,  
24 and donors.

25 Q. And what did Carol Gossett say?

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1           A.    As I recall, she sort of laughed it off  
2 and said, no, I don't think you have anything to  
3 worry about.

4           Q.    Okay. Did you say anything back to her?

5           A.    No, I don't -- I don't recall saying  
6 anything.

7           Q.    When did that conversation occur?

8           A.    It would have been -- I don't recall it  
9 being the same day, that Friday that I had the  
10 conversation with Debbie Stinson. I want to say it  
11 was maybe a few days to right about a week prior.

12          Q.    So the conversation with Carol Gossett  
13 happened first?

14          A.    Yes.

15          Q.    Okay. A few days to a week earlier; is  
16 that what you said?

17          A.    I want to say maybe -- maybe a few days.

18          Q.    Okay. Do you remember where that  
19 conversation was?

20          A.    It was also in the CASA office space.

21          Q.    Okay. Anyone else in the conversation  
22 between you and Carol Gossett?

23          A.    Not that I recall.

24          Q.    What about the -- the conversation with  
25 Debbie Stinson, anyone else present?

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1 A. Not that I recall.

2 Q. Okay. Did you tell anybody else you  
3 thought you were about to get fired?

4 A. I can't remember.

5 Q. Okay. Oh. I'll show you what I'm marking  
6 as Defendant's Exhibit 10.

7 And these are your responses to the  
8 questions posed in Exhibit 9; right?

9 A. It appears so, yes.

10 (Exhibit Number 10 marked for  
11 identification.)

12 BY MR. HILL:

13 Q. Okay. Now, I know the date says  
14 05/28/2012, but that's a typo; right?

15 A. Yeah.

16 Q. Yeah.

17 A. I believe so.

18 Q. Got it. Okay.

19 Did you ever discuss the -- so all this  
20 information that you provided in response, did you  
21 ever discuss this information with anyone at the  
22 county?

23 MR. MEW: Object to form.

24 THE WITNESS: Without going into any  
25 detail, I did ask for some assistance from my,

1 at the time, program assistant, Raquel  
2 Stalimire (ph), to help gather some of the  
3 information that had been requested.

4 BY MR. HILL:

5 Q. Okay.

6 But after you provided this information,  
7 let's say -- just -- did you talk about it with John  
8 Johnson, Colin Slay, or Judge Teske?

9 A. No.

10 Q. Okay.

11 There's a reference under Number 2 to the  
12 CASA logo. What's the CASA logo? Meaning -- what I'm  
13 asking, is like, what does it say?

14 A. That was The Duck Truck that I had  
15 referred to, that primarily my CASA guardians, kind  
16 of, were responsible for. It had the -- an image of  
17 a duck running down both sides of the truck. And we  
18 also had the actual Clayton County CASA logo placed  
19 -- or painted onto the truck, as well.

20 Q. Okay. Did it say Friends of Clayton County  
21 CASA, or did it say Clayton County CASA?

22 A. I believe it said -- it was the logo,  
23 Clayton County CASA.

24 Q. Okay. Is that logo still in use, the same  
25 logo, today?

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1 A. That I don't know.

2 Q. Okay.

3 So if you look back real quick at Document  
4 -- I mean, Exhibit Number 9 and Question Number 10  
5 that we were talking about a second ago. You were  
6 asked to -- if you had -- sorry, scratch that.

7 In the middle of that paragraph is a  
8 question that says, "Did you recruit any volunteers  
9 for Clayton County CASA directly as a result of this  
10 sponsorship?" Talking about the HSL Sponsorship. And  
11 then it asks for the name and contact info of any  
12 such Clayton County CASA volunteer.

13 And in your response in Exhibit 10, you  
14 give a pretty lengthy response on what all that was  
15 for. But you do not identify any Clayton County CASA  
16 volunteers in this response; correct?

17 MR. MEW: Object to form.

18 THE WITNESS: That is incorrect.

19 BY MR. HILL:

20 Q. Okay. Explain to me how it is incorrect.

21 A. Chris Burton with AT&T is referenced.

22 Q. Mm-hmm.

23 A. Scott Legnon with Children's Healthcare of  
24 Atlanta is listed. Edwin Ness, a journalist with  
25 CNN, is mentioned.

1 Q. Okay.

2 A. It's also mentioned that Dragon Con  
3 Atlanta committed to be a donor or sponsor for the  
4 2013 Darlin' Duck Derby. And Heery Corporation is  
5 also referenced.

6 Q. Okay. But these people did not become  
7 court-appointed special advocates; correct?

8 A. They became CASA volunteers that hopefully  
9 would have, at best, become CASA guardians. But they  
10 did volunteer their -- their time and services.

11 Q. Okay.

12 A. That would have been, most likely, the  
13 next step for them.

14 Q. Okay. But they did not volunteer their  
15 time and services as court-appointed special  
16 advocates; right?

17 A. They volunteered as a part of Clayton  
18 County CASA.

19 Q. Okay. But not as CASAs personally  
20 themselves; right?

21 A. Well, I consider them a CASA volunteer.

22 Q. I understand that -- that we can have  
23 differences about what we mean by volunteers. And  
24 I'm just -- I'm just making it clear that they did  
25 not volunteer as court-appointed special advocates;

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1 did they?

2 A. They had not completed the application or  
3 the training by the time I had been terminated.

4 Q. Okay. And they didn't tell you they were  
5 going to, did they?

6 A. Those individuals did not. There is one,  
7 Chris Bodeen, that had expressed interest and had  
8 told me he had heard of CASA before. And when we had  
9 returned from Birmingham, he was going to begin the  
10 application process.

11 Q. Okay. Is he mentioned in the response in  
12 Number 10?

13 A. I, for some reason, don't believe I see  
14 him listed in here.

15 Q. Okay. So he's not mentioned in this  
16 response?

17 A. I do not see his name.

18 Q. Okay.

19 A. No, sir.

20 Q. And was he someone who played in the HSL  
21 League?

22 A. That is correct. He played on my team.

23 Q. On your team. Okay.

24 A. And I believe he lived either in DeKalb or  
25 Fulton County.



1 Q. Okay.

2 And I think -- I think you said this, you  
3 do -- you don't -- you do not know if he filled out  
4 the application and went through the training to  
5 become a CASA even, like, after your termination?

6 A. I spoke with Chris at some point after I  
7 was terminated, and he made it very clear to me he  
8 would not be volunteering his services or efforts  
9 with Clayton County after my termination.

10 Q. Okay. What did he -- the best you can  
11 recall, what were his exact words?

12 A. I want to say something to the effect of,  
13 they're crazy if they think I will come to Clayton  
14 County now that they fired you.

15 Q. What did you tell him in that conversation  
16 before he made that response?

17 A. Well, he knew that I had been terminated,  
18 and my -- my whole team knew.

19 Q. Okay. Did you tell him that you believed  
20 you had been terminated because of your sexual  
21 orientation?

22 A. Yes, I did.

23 Q. Okay.

24 And so then he responded, well, I'm not  
25 going to volunteer if that's what happened,

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1 something along those lines; right?

2 A. Correct.

3 Q. Okay. Did you tell everyone on your team  
4 that that was the reason you believed you were  
5 terminated?

6 A. Well, I didn't really have to tell them  
7 because the coach had seen the ABC News coverage and  
8 contacted me immediately, and then I think sent a  
9 message to the -- the team members that there had  
10 been the termination.

11 Q. Did he send -- like, was this an e-mail?

12 A. Probably.

13 Q. And did the e-mail say, Gerald Bostock has  
14 been fired because he's gay? Did he say that?

15 A. I don't know what his comment was.

16 Q. Okay.

17 Because the -- the ABC -- when you said  
18 the ABC News coverage, are you talking about that  
19 initial -- that interview between Judge Teske and  
20 Richard Belcher that was televised?

21 A. Correct.

22 Q. Okay. And that interview didn't say  
23 anything about your sexual orientation; right?

24 MR. MEW: Object to form.

25 THE WITNESS: When referencing restaurants

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1 in and around the Midtown area, I think most  
2 people found it odd that both had rainbow flags  
3 waving out front.

4 BY MR. HILL:

5 Q. Oh, okay. The footage had rainbow flags on  
6 --

7 A. Correct.

8 Q. Okay.

9 So do you think an objective person  
10 watching that news footage would have drawn the  
11 inference that your sexual orientation played a role  
12 in the termination?

13 A. I think that's reasonable.

14 Q. Regarding the -- the HSL sponsorship, was  
15 -- there was going to be -- was -- part of that  
16 sponsorship, there was going to be some message or  
17 something on the jerseys of the uniforms?

18 A. Not on the jerseys --

19 Q. Okay.

20 A. -- of the actual uniform, but it was a  
21 team T-shirt that listed the sponsors of the team.  
22 And the team had agreed to place the Clayton County  
23 CASA logo dead center on the back of the team  
24 T-shirt.

25 Q. Okay. Did those T-shirts get made?

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1 A. They did.

2 Q. Do -- do you still have one of those  
3 shirts?

4 A. I do not have the shirt. I turned it over  
5 to my legal team.

6 MR. HILL: Okay. I don't think we've seen  
7 -- have we seen like a --

8 MR. MEW: We haven't given it to you, but  
9 if you want to see it --

10 MR. HILL: Okay.

11 MR. MEW: -- we can make it available.

12 MR. HILL: Okay.

13 MR. MEW: I mean, it's going to be  
14 evidence in the case in all likelihood. So if  
15 you want to take a picture or anything like  
16 that.

17 MR. HILL: Yeah, I -- I just don't think  
18 we've seen what it looks like, but okay.

19 BY MR. HILL:

20 Q. So in addition to the shirt, there was  
21 also a banner; is that right?

22 A. That is correct. There was a -- what you  
23 would call a sponsor banner. And the -- the logo was  
24 placed on that -- that same logo was placed on the  
25 banner.

1 Q. And so the banner would -- the idea was it  
2 would be displayed at games, and so the people who  
3 come to see it, can see the banner?

4 A. That is correct. It -- not only at games  
5 within the league but also at tournaments that the  
6 team attended.

7 Q. Okay. And the banner would be placed, I  
8 guess, like along, like, the outfield wall or  
9 something like that?

10 A. For games held within HSL, the banner  
11 would be on the fence of the actual -- kind of,  
12 like, at the dug-out. Now, at the tournament, our  
13 banner was chosen to be placed at the front entrance  
14 that had probably upwards of 2,000 people walk by it  
15 every single day of the tournament.

16 Q. Okay.

17 And what it -- what was -- what was on the  
18 banner that was CASA-related? Was it the same -- the  
19 same logo you were talking about?

20 A. Correct. The same Clayton County CASA  
21 logo.

22 Q. Okay. And it said Clayton County CASA, not  
23 Friends of Clayton County CASA?

24 A. Correct.

25 Q. Okay.

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1           And I think I understand how you're saying  
2 this fits in the MOU, but just to make sure we're on  
3 the same page.

4           Is it your testimony that that would fit  
5 within the MOU under, you know, recruitment --  
6 volunteer recruitment because people who see the  
7 logo, it might encourage them to either become CASAs  
8 themselves or to donate money to the Friends of  
9 Clayton County CASA?

10          A.    I absolutely stand by that, evidenced by,  
11 I had one verbal commitment from a teammate. I also  
12 had another teammate that agreed to volunteer as a  
13 male model for the Georgia CASA Fashion Show. I had  
14 the representative from CNN that was a tie-in to the  
15 -- the league, as well.

16           And I had two verbal commitments for  
17 sponsorships. One of which was Dragon Con Atlanta,  
18 for \$2,500. So it most definitely fits under  
19 community awareness, which equates to recruitment,  
20 training, and retention.

21          Q.    But you understand that, like, Colin Slay,  
22 Judge Teske, and some others could have a different  
23 reading of the MOU and think that doesn't fall  
24 within recruitment, training, or retention?

25           MR. MEW: Object to form.

1 THE WITNESS: What I know is the wording  
2 in that MOU, and I applied based -- my actions  
3 based on the wording that I read and the  
4 conversations that were held during the  
5 development of that MOU.

6 BY MR. HILL:

7 Q. And those conversations were with other  
8 advisory board members; is that right?

9 A. No, as stated earlier, with  
10 Judge Benefield and --

11 Q. Okay.

12 A. -- and with Judge Simmons.

13 Q. Did you actually ask Judge Benefield or  
14 Judge Simmons about what the scope of recruitment,  
15 training, and retention is?

16 A. My recollection of those conversations is  
17 that the intent was meant to be broad so that we had  
18 the ability to continue to grow a very strong  
19 program that did fluctuate occasionally with our  
20 number of volunteers. But they wanted us to have  
21 that flexibility with how those funds were spent as  
22 long as it fell under that net of recruitment,  
23 training, and retention.

24 Q. Okay.

25 Do you remember if you actually asked

1 Judge Simmons or Judge Benefield something like, is  
2 it okay if I spend GAL funds on something that  
3 results in donations going to the Friends of Clayton  
4 County CASA?

5 MR. MEW: Object to form.

6 THE WITNESS: I don't recall some of those  
7 specifics, no.

8 BY MR. HILL:

9 Q. Okay.

10 A. And if I -- if -- if I can?

11 Q. Mm-hmm.

12 A. I think when I'm told that the intent is  
13 very broad, I think I took them at their word.

14 Q. Did they use that language, the intent is  
15 very broad? Someone actually said that?

16 A. That's what I recall.

17 Q. Okay.

18 A. And that's why -- or that's what I recall  
19 as to why they wanted the money to be turned over to  
20 the FCCC.

21 Q. After they said, you know, whoever said  
22 that the intent is very broad, did you go into any  
23 specific examples? What about this? What about that?

24 A. I don't recall.

25 Q. Okay. Do you remember which person said



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1 the intent is very broad --

2 A. I don't.

3 Q. -- or words to that effect?

4 A. I'm sorry, I don't.

5 Q. Okay.

6 MR. MEW: I'm going to go with your  
7 indulgence --

8 MR. HILL: Yeah.

9 MR. MEW: I'm going to do what we did --  
10 or what you guys did during the Judge Teske,  
11 and come around so I can see.

12 MR. HILL: Oh, sure.

13 MR. MEW: I assume you're going to play it  
14 for the witness.

15 MR. HILL: Yes. Yes.

16 MR. MEW: All right.

17 MR. HILL: Just going to play it for the  
18 witness.

19 MR. BUECHNER: What are we playing?

20 MR. HILL: This is a video that we  
21 produced.

22 MR. BUECHNER: Okay.

23 MR. HILL: I think -- so this will be --  
24 where does this thing go.

25 MR. BUECHNER: Did you call it an exhibit?

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1 MR. HILL: Yes, and then we'll produce  
2 this drive -- we'll produce this drive to the  
3 court reporter. Exhibit -- this will be 11.  
4 Goodness gracious.

5 (Exhibit Number 11 marked for  
6 identification.)

7 MR. BUECHNER: Am I out of frame for  
8 purposes of the video?

9 MR. HILL: Okay. Okay.  
10 (Exhibit Number 11 played for  
11 the record.)

12 BY MR. HILL:

13 Q. So that's you speaking in the video;  
14 correct?

15 A. Yes.

16 Q. Okay. And did you write those words  
17 yourself?

18 A. I participated.

19 Q. Okay.  
20 So I think you said this earlier, but are  
21 you -- you are not contending that the county  
22 learned of your sexuality based on your joining the  
23 Hotlanta Softball League?

24 MR. MEW: Object to form.

25 THE WITNESS: Repeat that again, please. I

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1 want to make sure I answer you correctly.

2 BY MR. HILL:

3 Q. Yeah, I understand.

4 So I think you said earlier that you are  
5 not contending in this lawsuit that the county  
6 learned of your sexuality based on the fact that you  
7 joined HSL.

8 MR. MEW: Same objection.

9 THE WITNESS: Yes.

10 BY MR. HILL:

11 Q. Okay.

12 So having watched that video, do you not  
13 agree that that is the clear implication of saying,  
14 I was fired because I'm gay? For ten years, I had a  
15 glowing record, and then I joined a gay softball  
16 league. That's when things changed. Within  
17 six months, I was fired.

18 So do you not agree that that is  
19 suggesting that when you joined the gay softball  
20 league, that is when your employer learned you were  
21 gay?

22 MR. MEW: Objection to form.

23 THE WITNESS: What I'm saying is, it was  
24 as a result of joining that. In other words, we  
25 know you're gay. Keep it at home. Keep it

1 quiet. Don't go into Midtown, go into gay bars  
2 and restaurants, and recruiting from within the  
3 gay community, including your gay softball  
4 team.

5 BY MR. HILL:

6 Q. Okay. So when you say that's when things  
7 changed, what things changed?

8 A. Well, I, all of a sudden, received notice  
9 of an audit --

10 Q. Mm-hmm.

11 A. -- that I had not had to deal with prior.  
12 There was attitude change towards me within court  
13 administration.

14 Q. Can you tell me about the attitude change?

15 A. A lot less personal or personality. More  
16 direct -- directives or -- all the social aspect of  
17 anything removed from any type of conversation.

18 Q. Well, who -- who specifically are you  
19 talking about?

20 A. I would contend Colin Slay, John Johnson,  
21 and Steve Teske.

22 Q. Okay. Anyone else's attitude change  
23 towards you?

24 A. Those would be the three that stand out  
25 the most.

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1 Q. When do you contend that Judge Teske, John  
2 Johnson, and Colin Slay found out that you had  
3 joined Hotlanta Softball League?

4 A. I don't recall for Colin Slay or John  
5 Johnson, but I clearly recall a conversation with  
6 Steve Teske. And that would have probably been the  
7 end of March, possibly the very first part of April.

8 Q. Okay. And what was -- how did that  
9 conversation go?

10 A. At the time, I thought it had gone well.  
11 Meaning, I had given him the information that I had  
12 decided to, you know, join the team, and I mentioned  
13 the benefit to Clayton County CASA.

14 Q. Mm-hmm.

15 A. And knowing that Steve Teske is a beer  
16 drinker, or had been, even made his own beer, there  
17 was a fundraising event for the team at Diesel, I  
18 believe, in Virginia Highland.

19 And given that he was a beer drinker, I  
20 had invited him to come and meet the guys and some  
21 of the supporters that we had. Some of the sponsors  
22 of the team were also going to be present at the  
23 fundraising event.

24 Q. And did he come to that event?

25 A. He had indicated he would be there, and

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1 then he never mentioned it again and did not show.

2 Q. Okay. Did you ever find out why he did not  
3 show?

4 A. No.

5 Q. Okay. Did you and Judge Teske ever discuss  
6 HSL at any other time?

7 A. As I recall, that was the only time that I  
8 -- I was letting him know that I had joined and that  
9 we were going to be involved with the team as a  
10 sponsor, and, again, the benefits of -- for  
11 recruitment, training, and retention.

12 Q. Did he say anything during that  
13 conversation to discourage you?

14 A. I don't really recall him having much  
15 response to me at all, and he just basically walked  
16 off in -- which was, again, very unlike him --

17 Q. Mm-hmm.

18 A. -- in past years.

19 Q. Okay.

20 You don't have any reason to believe that  
21 he became aware of the HSL sponsorship before that  
22 conversation; do you?

23 MR. MEW: Object to form.

24 THE WITNESS: I don't know.

25 BY MR. HILL:

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1 Q. Okay.

2 So what about Colin Slay? What -- when do  
3 you think -- when do you believe he became aware of  
4 the softball team sponsorship?

5 A. I really don't have any clue.

6 Q. Okay. What did you observe from him as far  
7 as attitude change that you discussed earlier?

8 A. Again, difference in personality. A little  
9 more short with responses during conversations, very  
10 little to none as far as socialization, very  
11 business-oriented, and somewhat avoidance, I would  
12 say.

13 Q. Like, if you were coming down the hall,  
14 would he turn around and go the other way?

15 A. Yeah, perhaps. Whereas, in the past, we  
16 would come up and speak to each other.

17 Q. Okay. What about John Johnson?

18 A. Same response to that question --

19 Q. Okay.

20 A. -- as it relates to him.

21 Q. Do you have any idea when he became aware  
22 of the HSL sponsorship?

23 A. I have no idea.

24 Q. Okay.

25 If any of these individuals -- Slay,

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1 Teske, Johnson, if any of them said that they  
2 learned of the HSL sponsorship as a result of the  
3 audit, do you have any reason to dispute that?

4 MR. MEW: Object to form.

5 THE WITNESS: With -- with Steve Teske,  
6 most definitely because, again, I made him  
7 aware.

8 BY MR. HILL:

9 Q. Okay. Around end of March or beginning of  
10 April is what you said; right?

11 A. That is correct.

12 Q. Okay.

13 Did you ever think that the termination  
14 just had to do with the fact that you spent  
15 court-assessed fees on a softball team, gay or not?

16 A. No, I very clearly felt it was a  
17 homophobic reaction to me participating in a gay  
18 recreational league and taking the opportunity by  
19 being a member to help people better understand the  
20 needs of child abuse and neglect victims, to educate  
21 them, to recruit them, hopefully, eventually, as a  
22 full-scale sworn-in volunteer.

23 But on whatever level, whether it be a  
24 CASA guardian that would help with mentoring a lot  
25 of our children and help us with projects, or



1 whether it be a sponsor or a donor to ensure that we  
2 did have that continued influx of money that could  
3 go toward recruitment, training, and retention.

4 Q. You don't know of anyone else in the  
5 county who used court-assessed fees for a  
6 recreational activity that they participated in; do  
7 you?

8 MR. MEW: Object to form.

9 THE WITNESS: I have no idea. I don't -- I  
10 don't know.

11 BY MR. HILL:

12 Q. Okay. Do you ever think that you were  
13 terminated because of your prostate cancer  
14 diagnosis?

15 A. No, I still stand that I was discriminated  
16 against based on my sexual orientation.

17 Q. Those facts that you recited in that  
18 video, if you replaced gay with prostate cancer, it  
19 would say, I'm Gerald Bostock, and I was fired  
20 because I developed prostate cancer. For ten years,  
21 I had a glowing record. And then I was diagnosed  
22 with prostate cancer, and that's when things  
23 changed. Within six months, I was fired.

24 I mean, those would all be true  
25 statements; right?

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1 MR. MEW: Object to form.

2 THE WITNESS: What was discussed in that  
3 video and that I shared about my story was an  
4 act of discrimination based on my sexual  
5 orientation. My diagnosis of prostate cancer  
6 was in 2012.

7 BY MR. HILL:

8 Q. Okay. Were you not fired within six months  
9 of beating prostate cancer?

10 A. I was still in recovery.

11 Q. Oh. I understood from the video you joined  
12 the softball team after beating prostate cancer; was  
13 that not right?

14 A. I was still in recovery.

15 Q. Okay.

16 But you would agree that just because you  
17 got prostate cancer before your termination, that  
18 does not necessarily mean that the prostate cancer  
19 was the cause of the termination; right?

20 MR. MEW: Object to form.

21 THE WITNESS: I felt supported during my  
22 prostate cancer treatment and early part of  
23 recovery. But again, I absolutely stand by a  
24 homophobic action that occurred by me being  
25 terminated based on my sexual orientation.

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1 BY MR. HILL:

2 Q. Okay.

3 So you do not believe that it is just as  
4 plausible to say you were terminated because of  
5 becoming a cancer patient as to say you were  
6 terminated because of being a gay man; right?

7 A. Well, in looking back at my performance  
8 reviews, it's clearly after I joined the Hotlanta  
9 Softball League that I was terminated.

10 Q. Did anyone, not just meaning a court  
11 employee, anyone, ever tell you that they understood  
12 that -- you to be alleging that the county  
13 discovered your sexual orientation when you joined  
14 the softball team?

15 MR. MEW: Object to form.

16 THE WITNESS: And can you reask that  
17 question?

18 BY MR. HILL:

19 Q. If I can -- okay.

20 What I was saying earlier- is after  
21 watching that video -- and I'll say -- and it seemed  
22 like an objective observer would say, his employer  
23 learned about his sexual orientation once he joined  
24 the softball league.

25 Did anyone ever tell you that that's how

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1 they interpreted that video or any of the other  
2 interviews you gave?

3 A. No, not that I recall. Most people that  
4 were aware were very upset.

5 Q. We talked about Mr. Holland earlier. Do  
6 you -- did he not reach out to you and ask, why are  
7 you telling people you were fired for being gay? And  
8 that your employer found out you were gay because  
9 you joined the gay softball league?

10 A. Mr. Holland did send me a -- it was either  
11 a text or an e-mail. I believe it was maybe a text.  
12 And for me, therapeutically, I jotted down a  
13 response, but then I immediately tore that response  
14 up and did not respond to Mr. Holland.

15 Q. Okay.

16 A. And if I may, I believe that was during  
17 the time period that the EEOC had their open  
18 investigation, and I was not going to jeopardize my  
19 EEOC case by speaking with Mr. Holland about the  
20 case.

21 Q. Had you made any public statements about  
22 your termination while the EEOC had its  
23 investigation going on?

24 A. No, not that I recall.

25 Q. So what would Mr. Holland have been

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1 referring to?

2 A. That I don't know.

3 Q. Okay.

4 So you had not made any public statements  
5 at the time, and Mr. Holland texted you out -- out  
6 of the blue, why are you telling people that your  
7 employer found out you were gay when you joined the  
8 softball league; is that what you're saying?

9 A. What I'm saying is, that I don't recall  
10 making any public statements about my termination so  
11 as to not jeopardize my EEOC case.

12 Q. Okay. So you don't know why Mr. Holland  
13 sent you that text that you're referring to?

14 A. I do not.

15 Q. Okay. Do you still have that text?

16 A. I do not believe so.

17 Q. What happened to it?

18 A. When I tore up my response, I'm sure I  
19 deleted it.

20 Q. Okay.

21 A. He was also deleted off of my Facebook  
22 page.

23 Q. Just while we have the video up, there was  
24 a picture in the video of a -- what looks like a  
25 softball team.

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1 A. That is.

2 Q. Is this the Honey Badgers Softball Team  
3 that you were a part of?

4 A. No, that's actually when I played with the  
5 SSL during fall ball. That's the Heretic Havoc.

6 Q. Got it. Oh, I do see it says Havoc. Okay.  
7 Were any of these individuals on the Honey  
8 Badgers Team, besides yourself?

9 MR. MEW: Is this an exhibit?

10 MR. HILL: It's part of that video. It's  
11 like a freeze-frame from the video, yeah.

12 THE WITNESS: This guy here, back row,  
13 second to my right, started with the Honey  
14 Badgers, and then he left. I think this guy --  
15 this guy here. I don't recall his name.

16 BY MR. HILL:

17 Q. Okay.

18 A. This guy occasionally may have subbed in  
19 -- played if we had a player out.

20 Q. Okay. So just for the -- for -- yeah, so  
21 -- so I can make it clear for the record, what we're  
22 referring to is a freeze-frame from that video that  
23 was marked as Exhibit 11. And so, you were  
24 identifying the gentleman three in from the right  
25 and two in from the right?

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1 A. Yeah, this gentleman here --

2 Q. Okay.

3 A. -- with the mustache.

4 MR. MEW: Is there a time stamp on the  
5 freeze frame, just for purposes of the record?

6 MR. HILL: Yes, 31 seconds.

7 BY MR. HILL:

8 Q. Okay. And you don't remember their names?

9 A. This -- I know his name, Patrick Hanson.

10 Q. Okay. But you don't remember the man three  
11 -- three in from the right? You don't --

12 A. I don't -- I don't remember his name.

13 Q. Okay. And none of these other people  
14 played on the Honey Badgers Team?

15 A. This one in the middle, after I left the  
16 Honey Badgers, he joined the Honey Badgers, but it  
17 was after.

18 Q. Okay.

19 A. So that would have been after I was  
20 terminated.

21 Q. Okay.

22 At the time you gave this interview to  
23 CBS, you knew it was going to be broadcast on  
24 national TV; correct?

25 A. I assumed it would be if the -- if CBS

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1 actually covered the story, yes.

2 Q. And you also knew at the time that it very  
3 likely would be on the internet for the entire world  
4 -- world to see; correct?

5 MR. MEW: Object to form.

6 THE WITNESS: I assumed that, yes.

7 BY MR. HILL:

8 Q. You knew at the time that you gave this  
9 interview that there was a very good chance it'd be  
10 seen by people you used to work with at the  
11 courthouse; right?

12 A. That's reasonable.

13 Q. In giving this interview, would you be  
14 trying to influence potential witnesses in this case  
15 before it proceeded into discovery?

16 MR. MEW: Object to form.

17 THE WITNESS: That was not my intent.

18 BY MR. HILL:

19 Q. Do you contend in this lawsuit that if you  
20 had used the GLA funds to sponsor a softball team  
21 that was not a gay softball team that you would not  
22 have been terminated?

23 MR. MEW: Object to form.

24 THE WITNESS: Yes.

25 BY MR. HILL:



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1 Q. And why do you believe that?

2 A. Because I think it would have been viewed  
3 differently. The discriminatory act was that my  
4 sexual orientation joining a gay softball league,  
5 including and inviting members from the gay  
6 community to become CASA volunteers, sponsors, or  
7 donors, did not sit well with Clayton County  
8 administration or the juvenile court.

9 Q. But this is based on your perception;  
10 correct?

11 MR. MEW: Object to form.

12 THE WITNESS: It's based on my belief.

13 BY MR. HILL:

14 Q. Okay.

15 You're not saying the outcome would have  
16 been different if it had been a female employee in  
17 your position who had used GAL funds to sponsor a  
18 women's softball team; do you?

19 MR. MEW: Objection. Same objection.

20 THE WITNESS: If it were a gay female  
21 softball team and gay softball league, I think  
22 it would have had the same outcome.

23 BY MR. HILL:

24 Q. Okay. But not if it were not a gay women's  
25 softball league?

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1 MR. MEW: Same objection.

2 THE WITNESS: Most likely not.

3 MR. MEW: Hey, Michael?

4 MR. HILL: Mm-hmm.

5 MR. MEW: We're an hour -- about an hour  
6 in from when we started. I -- I got to take a  
7 bathroom break. I'm sorry, man.

8 MR. HILL: We can take a break.

9 MR. MEW: All right.

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

11 MR. MEW: I put myself on the record  
12 there, but I got to --

13 THE VIDEOGRAPHER: The time is 4:27. We  
14 are going off the video record.

15 (A break was taken.)

16 THE VIDEOGRAPHER: 4:43, we are back on  
17 the video record.

18 BY MR. HILL:

19 Q. Okay.

20 Mr. Bostock, we were just talking about  
21 the HSL sponsorship. Apart from getting the logo on  
22 the jersey -- sorry -- not jerseys.

23 Apart from getting the logo on the shirts  
24 and the banner, what else did the -- would the  
25 sponsorship have been used for?

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1 A. Possibly to supplement the water supply.

2 Q. Okay. Would it have covered, like,  
3 registration fees for the team?

4 A. No.

5 Q. Okay. Or any, like, activity fees or any  
6 kind of fees for the individual players?

7 A. No.

8 Q. Okay. Did it cover the cost of the  
9 uniforms?

10 A. No.

11 Q. How many games do you think you played  
12 with the Honey Badgers at that time?

13 A. Right off, I can't recall. It was -- I  
14 played the full season with them, including  
15 tournament play.

16 Q. How frequently was there a game?

17 A. Every weekend.

18 Q. Okay. So you think every weekend from,  
19 like -- scratch that.

20 When did the season start?

21 A. Around the end of March.

22 Q. Okay.

23 A. Maybe early April, but it seems like to me  
24 it was more like end of March. And it usually  
25 started off with some tournament plays around the

1 country. And then it ran through possibly August,  
2 September when the World Series would occur.

3 Q. Okay. So at least from a -- you think from  
4 the end of March, through your termination, you  
5 played a game every weekend?

6 A. With a couple of exceptions like Mother --  
7 Mother's Day or Easter.

8 Q. Okay. What -- at what fields did you all  
9 play?

10 A. During the HSL season --

11 Q. Mm-hmm.

12 A. -- we played at a park. And I forget the  
13 name of the park, but it was out by Six Flags.

14 Q. Okay. Were all the games out there?

15 A. Yes.

16 Q. Okay.

17 A. For HSL.

18 Q. For HSL. Right. Yeah.

19 Were there any practices in addition to  
20 games?

21 A. Yes, every Saturday.

22 Q. Okay.

23 A. The games were on Sunday.

24 Q. Where were the practices held?

25 A. Those occurred in various locations. It

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1 would be dependent on where the team could find  
2 available fields.

3 Q. Okay. Were they ever in Clayton County?

4 A. I don't recall a practice in Clayton  
5 County, but I do recall maybe one practice in East  
6 Point or College Park.

7 Q. Okay. And you're saying that would be,  
8 like, the closest to Clayton County that you can  
9 recall?

10 A. That I can recall.

11 Q. Got it.

12 Would you ever go out, like, after a game  
13 or after a practice with other teammates to a bar or  
14 restaurant or anything like that for, like, drinks  
15 afterwards?

16 A. Yeah, I think that would be a pretty  
17 common thing to happen.

18 Q. Okay.

19 Would you ever use GAL funds to pay for  
20 drinks or appetizers or anything at one of these  
21 after-game, after-practice gatherings?

22 A. No.

23 Q. Okay. Would you not use it because you  
24 don't think that would be an appropriate use of the  
25 GAL funds?

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1 MR. MEW: Object to form.

2 THE WITNESS: I used it because I was on  
3 my personal -- I used my own personal monies  
4 because I considered myself on personal time.

5 BY MR. HILL:

6 Q. Okay.

7 A. So play -- just to that point, playing on  
8 the HSL Softball Team, also, did have a personal  
9 benefit to you, as well; right?

10 MR. MEW: Object to form.

11 THE WITNESS: I would say yes because the  
12 reason I joined was to prove that I could do it  
13 both physically and mentally after going  
14 through my treatments and being in recovery.

15 But as I did with every aspect of my life,  
16 if I had the opportunity to talk about CASA, I  
17 jumped on it, whether it was with family,  
18 friends, or with complete strangers. It didn't  
19 matter to me. If I could recruit and bring more  
20 people into the program, I was willing to do  
21 it.

22 BY MR. HILL:

23 Q. Okay. But playing softball is fun; right?

24 A. Absolutely.

25 Q. Okay. I'll show you what I'm marking as

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1 Defendant's Exhibit 12.

2 Oh, sorry. Before I move on to exhibits,  
3 where were tournaments played?

4 A. There was a tournament I played in, in  
5 Birmingham. There was also a tournament that I  
6 participated in, in Nashville. There were other  
7 tournaments around the country, but those are the  
8 only two that I recall that my team went to.

9 Q. Okay.

10 And so the Birmingham one and the  
11 Nashville ones, you went to both of those while you  
12 were still working for Clayton County; right?

13 A. Yes.

14 Q. Okay. Okay. I'll move to Defendant's  
15 Exhibit 12. And you've seen this document before;  
16 correct?

17 A. Yes.

18 (Exhibit Number 12 marked for  
19 identification.)

20 BY MR. HILL:

21 Q. Okay.

22 This is a memo to you from Colin Slay back  
23 in July 2010. And it starts off saying, "As you are  
24 aware, a complaint was filed against you." Do you  
25 see that?

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1 A. I do.

2 Q. Do you know who filed a complaint against  
3 you?

4 A. I do not recall.

5 Q. Okay.

6 Do you -- you can take a second to look it  
7 over if you need to, but do you remember, generally,  
8 this whole issue about the Summerfest Event in -- in  
9 the summer of 2010?

10 A. Basically, yes.

11 Q. And what is Summerfest?

12 A. Summerfest was a community event that was  
13 held in Morrow. And for this particular year, it was  
14 held at what was called Olde Towne Morrow, which was  
15 a development right beside the Southlake Mall area.  
16 And it had -- it looked like an old town with  
17 businesses in those structures that -- that look old  
18 houses and old buildings.

19 And it was a chance for organizations to  
20 come out and highlight what kind of work they do. It  
21 also provided entertainment for the community. I --  
22 there may have been bands that played and, like, a  
23 food truck area or something to that effect.

24 Q. Okay. So it was not just a FCCC event?

25 A. No, it was a -- a community event by the



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1 City of Morrow I -- I believe.

2 Q. Okay. Did Friends of Clayton County CASA  
3 have, like, a booth or something there?

4 A. We did.

5 Q. You did. Okay.

6 So would money have been raised at  
7 Summerfest that would have gone into the -- the  
8 board account?

9 A. I don't recall if any actual funds were  
10 raised other than Duck Derby tickets because we were  
11 selling the Duck Derby tickets.

12 Q. Okay.

13 A. And for the car giveaway, the -- the car  
14 was present with signage. I do know that -- that I  
15 personally secured some sponsorships from businesses  
16 that attended the event.

17 Q. Okay. Did you ever talk with Colin Slay  
18 about this memo after you received it?

19 A. I don't recall. I know we had a group  
20 meeting which included my staff, but I can't  
21 remember if this was afterwards or -- I -- I just  
22 don't recall exactly.

23 Q. Okay.

24 In this first bullet point on that first  
25 page, it starts off saying that several

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1 staff-related they felt set up by you. "Waiting  
2 until Monday to address their performance at  
3 Saturday's event."

4 Did -- do you believe that's a fair  
5 statement of what you were doing?

6 A. I do not believe that's a fair statement.

7 Q. Okay.

8 Do you know what they're talking about?  
9 Was there something that happened on Saturday, and  
10 then you addressed it on Monday, and people seemed  
11 to have gotten -- gotten mad about that? Do you  
12 remember this at all?

13 A. What I recall is, we had a booth. And,  
14 again, the vehicle was present. And probably three  
15 to four, maybe even five board members were also  
16 present. And my staff that had attended, they had  
17 brought coolers, which is appropriate. It was hot,  
18 and they had beverages in -- in the coolers.

19 And they had set up a tent. And they were  
20 sitting under the tent talking, laughing, and  
21 joking. And my board members and myself, we were out  
22 in the crowd recruiting, trying to retain sponsors  
23 that were there.

24 Q. Mm-hmm.

25 A. And I believe at least once I mentioned

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1 something to the staff about assisting, especially  
2 given that the -- the board members were out in the  
3 sun on their own time trying to promote the Duck  
4 Derby and to help with CASA awareness.

5 I don't recall -- maybe one or two staff  
6 got up and walked around for a moment or two, and  
7 then it became another social activity under the  
8 tent.

9 So Monday morning, when it rolled around,  
10 I thought I would use it as a training opportunity  
11 with my staff. And I waited to see who was going to  
12 submit for basically comped time --

13 Q. Mm-hmm.

14 A. -- for those hours on Saturday. And pretty  
15 much all the staff that attended submitted their  
16 request.

17 So I called them in individually, and I  
18 just asked them very calmly. There was -- you know,  
19 it -- it was not a heated discussion with any of my  
20 staff. But I wanted to know what they felt they had  
21 contributed on Saturday.

22 Q. Okay.

23 A. Basically, they stumbled around and were  
24 unable to provide anything. So I said, well, let me  
25 give you an example of what I did on Saturday. So I

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1 referenced the sponsors that I had --

2 Q. Mm-hmm.

3 A. And I believe it was two that I had gotten  
4 signed commitments on. There were also Duck Derby  
5 Ticket sales that I had -- had brought in. And none  
6 of the other staff were able to do that. They still  
7 got their comped time, and then I was hit with this  
8 information.

9 Q. Okay.

10 And under the second bullet point where it  
11 says that several staff felt that your approach to  
12 the follow-up meetings was confrontational, and some  
13 even complained unprofessional, I'm assuming you  
14 would disagree.

15 You do not think that your approach would  
16 have been confrontational or unprofessional; do you?

17 A. I completely disagree.

18 Q. Okay.

19 And Colin Slay, I believe he even states  
20 in here, in the second paragraph, that despite these  
21 complaints, he looked over everything and believed  
22 you didn't do anything wrong; right?

23 A. As I recall, yes.

24 Q. Yeah.

25 This third bullet point on the second page

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1 says something about forcing staff to participate in  
2 after-hours events. Did you force staff to  
3 participate in after-hours events?

4 A. I did not. They were encouraged to  
5 participate.

6 Q. Okay. These after-hour events, would they  
7 have been FCCC board events?

8 A. Probably only if it were related to Duck  
9 Derby.

10 Q. Okay. But you did not force Clayton County  
11 CASA staff to participate in Duck Derby?

12 A. They were encouraged.

13 MR. HILL: Okay. Are we on 13 right now?

14 THE COURT REPORTER: Yes.

15 BY MR. HILL:

16 Q. Okay. I'll show you what I'm marking as  
17 Defendant's Exhibit 13. Okay. Okay.

18 There's another memo to you, dated  
19 November 11th, 2010, from John Johnson and Colin  
20 Slay. Have you seen this before?

21 A. It looks familiar, yes.

22 (Exhibit Number 13 marked for  
23 identification.)

24 BY MR. HILL:

25 Q. Okay.

1                   And so that's the first two pages. And  
2 then attached to it at Bates Stamp Clayton-248  
3 through 253, it looks like some minutes from a CASA  
4 staff meeting on November 9th, 2010. Have you seen  
5 this before?

6           A.     Yes.

7           Q.     Okay.

8                   This very first sentence on the memo says,  
9 "Keep in mind that your employees are building a  
10 case for a hostile work environment."

11                   Do you have an understanding of what  
12 hostile work environment means?

13                   MR. MEW: Object to form.

14                   THE WITNESS: I do have a basic  
15 understanding, yes.

16 BY MR. HILL:

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

18           A.     That somebody in authority, usually, might  
19 conduct themselves in a manner which an employee  
20 feels to be hostile or turbulent.

21           Q.     In, I think, the fourth sentence, still in  
22 Number 1, "Employees do not have to work within this  
23 type of environment. And it is only a matter of time  
24 before they will act upon this concern in a way that  
25 is beyond our control."

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1 Do you have any idea what that sentence  
2 means?

3 A. Not really, I suppose.

4 Q. Do you think that John Johnson and Colin  
5 Slay were concerned that members of your staff might  
6 go to the EEOC or file a lawsuit or do any --  
7 something like that?

8 MR. MEW: Object to form.

9 THE WITNESS: I can't answer that. I don't  
10 know.

11 BY MR. HILL:

12 Q. Okay. You don't believe that you were  
13 creating a hostile work environment; do you?

14 A. I do not. I -- I believe I had a certain  
15 expectation of work ethic. You come to work to  
16 perform your duties as written in your job  
17 description or as other duties assigned. It's not a  
18 social time to visit with friends and -- and -- and  
19 not conduct the work.

20 Q. Okay.

21 Under Number 4, it says something about  
22 Shawn having made statements that -- of having a  
23 target on his back. Is this talking about Shawn  
24 Black?

25 A. Yes.

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1 Q. Okay. Did you have a target on his back?

2 A. I -- I absolutely did not have a target on  
3 his back.

4 Q. Also, in this Number 4, it says that he's  
5 -- let me just read it.

6 "Remain aware of the statements that Shawn  
7 has made of having a target on his back, working in  
8 a hostile environment, that you are concerned with  
9 what he is doing 24 hours a day and with his  
10 personal life, that other staff are being warned  
11 about associating with him."

12 So were you concerned about what he was  
13 doing in his personal life?

14 A. No, and I would say that's a false  
15 statement. He did live up the street from my home,  
16 and I usually did not even go that direction when I  
17 was leaving my property. I went the other way.

18 Q. Did you do that deliberately so you would  
19 not have to interact with him?

20 A. Mm-hmm.

21 Q. Okay. Did you warn other staff against  
22 associating with Shawn Black?

23 A. No.

24 Q. These CASA staff meeting minutes that are  
25 attached from Clayton-248 to 253 --



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1 A. Mm-hmm.

2 Q. -- to the best of your recollection, is  
3 this an accurate reflection of what was discussed  
4 during this meeting?

5 MR. MEW: Take time to review them if you  
6 need to --

7 MR. HILL: Sure.

8 MR. MEW: -- Mr. Bostock.

9 THE WITNESS: This appear -- appears to be  
10 what I recall from the meeting.

11 BY MR. HILL:

12 Q. Okay. If you turn to where it says Page 4  
13 of 6 at the top. Okay. Sorry about that. Page 5 of  
14 6. Sorry.

15 A. All right.

16 Q. You have the next page. It looks like  
17 there's a section talking about your comments. Do  
18 you see a Number 1 in the middle where it says,  
19 "Needed to keep an eye on Shawn?" Do you see that?

20 A. Yes.

21 Q. Did you -- did you say that during the  
22 meeting that you needed to keep an eye on Shawn?

23 A. I believe that was in context to his  
24 complaint that he was not able to move into an  
25 office space in the old juvenile court building that

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1 had a window. And I had expressed concern about some  
2 of his activities, or lack thereof, while he was on  
3 the clock. And so that's what I recall about that --

4 Q. Okay.

5 A. -- statement.

6 Q. Is it fair to say you did not trust Shawn  
7 Black?

8 A. Initially, I did. He started with the  
9 program as a volunteer and then applied for a  
10 position when it became available. But as he took on  
11 the responsibilities, there began to be concerned  
12 about his work performance.

13 Q. Okay. So at some point, did you lose trust  
14 in him?

15 A. Pretty much.

16 Q. In your opinion, is he still not a  
17 trustworthy individual?

18 MR. MEW: Object to form.

19 THE WITNESS: I haven't had any contact  
20 with him since he left the juvenile court.

21 BY MR. HILL:

22 Q. Okay. But the last contact -- at the time  
23 of the last -- well, strike that.

24 When was the last time you had contact  
25 with him?

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1           A.     When his grant-funded position basically  
2     expired, and the county was not able to shift monies  
3     into -- or allocate funds to keep that position  
4     going.

5           Q.     Would that be around January 2013?

6           A.     No, I think it was before that.

7           Q.     Would it have been like the end of 2012?

8           A.     I honestly can't remember.

9           Q.     Okay. But somewhere around that time,  
10    roughly?

11          A.     I -- I don't recall.

12          Q.     Okay.

13                    So at -- whenever it was, at the time of  
14    your last contact with Shawn Black, did you consider  
15    him to be a credible person?

16          A.     No.

17          Q.     Okay. Why not?

18          A.     Based on his behaviors and actions while  
19    he was still employed, I.E., lying about where he  
20    was, saying he was one place, but actually somewhere  
21    else, saying he was at meetings that never existed,  
22    and never was able to give an explanation as to  
23    where he was.

24                    I would occasionally come in unannounced  
25    and -- and find, again, social hour going on in the

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1 offices.

2 Q. Okay. Did you ever write him up for any of  
3 these behaviors?

4 A. He was evaluated on the performance  
5 process that the county had.

6 Q. Okay. And were these behaviors that you  
7 mentioned brought up during that evaluation?

8 A. Yes, I believe so.

9 Q. Okay. Did you terminate Shawn Black?

10 A. He technically was terminated. I did not  
11 terminate him. Again, his grant-funded position had  
12 completed its grant cycle. And that -- as I recall,  
13 that grant was not being renewed.

14 So we did go to the county commissioners  
15 to request an allocation to keep the position moving  
16 forward. And as I recall, our request had been  
17 denied.

18 Q. Okay. If the request had been approved,  
19 would you have kept him employed?

20 MR. MEW: Object to form.

21 THE WITNESS: Most likely, unless his  
22 performance reviews continued to drop.

23 BY MR. HILL:

24 Q. I'll show you what I'm marking as  
25 Defendant's Exhibit 14.



1 members of your staff?

2 A. I don't recall any, no. And I don't see a  
3 signature page where I would have signed this.

4 Q. Yeah, do you remember seeing this before  
5 at all?

6 A. It doesn't stand out to me, no.

7 Q. Okay.

8 A. If I may, though?

9 Q. Yes.

10 A. I do note on Page 2 the score of 48 out of  
11 50.

12 Q. Page 2. Okay.

13 So despite these negative comments, you  
14 got an overall favorable review from your  
15 supervisors; right?

16 MR. MEW: Object to form.

17 THE WITNESS: In looking at the scoring  
18 mechanism, I received 48 out of 50.

19 BY MR. HILL:

20 Q. Right. That's a good review; right?  
21 Overall?

22 A. Yes, it is. I -- I've seen other reviews  
23 for other people that were employed by Newman --  
24 like, the county assigned to juvenile court, and  
25 their scores were much less than that.

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1 Q. Okay.

2 Would you agree that just because some  
3 employees complain about a supervisor doesn't  
4 necessarily mean that the supervisor is doing  
5 anything wrong?

6 MR. MEW: Object to form.

7 THE WITNESS: I think that's very  
8 reasonable.

9 BY MR. HILL:

10 Q. I'll show you what I'm marking as  
11 Defendant's Exhibit 15. This appears to be a  
12 counseling form, Bates-stamped Clayton-539 to 540,  
13 dated May 2012. You've seen this before?

14 A. I would have to say yes because that's my  
15 writing that I am not willing to sign this general  
16 counseling form.

17 (Exhibit Number 15 marked for  
18 identification.)

19 BY MR. HILL:

20 Q. Why were you not willing to sign the  
21 general counseling form?

22 A. Because I disagreed with the content.

23 Q. Okay.

24 It says in here under Number 1 that you  
25 had submitted a request to terminate an employee

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1 without taking the proper steps; is that a true  
2 statement?

3 A. I don't recall that.

4 Q. Okay. So you don't recall what employee is  
5 being discussed here?

6 A. No, I don't.

7 Q. Okay.

8 With -- Number 2 brings -- the box under  
9 Number 2 brings up some complaints from staff in  
10 July 2009. It says, "V. Henry, January 2010, S.  
11 Black." And then, "July 2010, Summerfest," which I  
12 think we looked at earlier.

13 In these instances, when employees had  
14 made complaints about you, do you think they were  
15 being untruthful about you?

16 MR. MEW: Object to form. Object to form.

17 THE WITNESS: I think there was a lot of  
18 untruth (sic), and I think there was a lot of  
19 over-exaggeration on their part.

20 BY MR. HILL:

21 Q. Do you believe some of the staff members  
22 may have misunderstood the reasoning behind your  
23 actions?

24 A. Oh, I don't --

25 MR. MEW: Object to form.



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1 THE WITNESS: I don't -- I don't know.

2 BY MR. HILL:

3 Q. Okay.

4 Do you remember what -- these complaints  
5 from staff in July 2009, referring to V. Henry, do  
6 you know what that's about?

7 A. As I recall, that was the result of an  
8 incident where I was not on property, and he got  
9 into a confrontation with Concilia Chillumuna. And  
10 Ms. Chillumuna reported the incident to me, and  
11 consequently, Mr. Henry was written up.

12 Q. Okay. In that incident, you don't think  
13 you did anything inappropriate in that circumstance;  
14 do you?

15 A. No.

16 Q. Okay.

17 Was there an incident, at some point in  
18 your employment, where someone reported that you had  
19 photographs of nude people on your work computer?

20 A. I do recall a conversation about that, and  
21 I also recall that the person that allegedly claimed  
22 that was another disgruntled employee that was  
23 actually hired to be our recruiter and trainer for  
24 CASA, which entailed some evening hours because  
25 that's when some of our training sessions were held.

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1 And he had difficulty with that schedule and  
2 routine.

3 And when confronted about it and  
4 discussions about it, he ended up just walking in,  
5 apparently, one day either over the weekend or at  
6 night, and had cleared everything out of his office.  
7 And supposedly, he had reported just prior to doing  
8 that that he had found photographs.

9 I found him in my office at my computer,  
10 which I found very odd, which caused me to suspect  
11 possible foul play, as I recall it.

12 Q. What was his name?

13 A. David Santiago.

14 Q. And he was a recruiter and trainer?

15 A. He was the CASA volunteer recruiter --

16 Q. Okay.

17 A. -- and trainer.

18 Q. That's the same position that later went  
19 to Becky Galbraith; is that right?

20 A. Correct.

21 Q. Okay.

22 Did -- you said suspected foul play. Like,  
23 are you saying that you suspected he installed some  
24 photographs on your computer?

25 A. I guess I'm suggesting it's possible

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1 because he should not have been at my computer.

2 Q. Okay. So were there actually photographs  
3 of nude individuals on your computer -- work  
4 computer?

5 A. I don't recall that, no.

6 Q. Okay. But that's what -- as far as you  
7 recall, that's what David Santiago reported?

8 A. In so many words, I think so, yes.

9 Q. And he reported that to -- to whom did he  
10 report that?

11 A. I don't know.

12 Q. Okay. Did John Johnson talk to you about  
13 this incident?

14 A. We did have some conversation, yes.

15 Q. Okay. Apart from David Santiago and John  
16 Johnson, any -- did you talk with anyone else about  
17 this?

18 A. I think Judge Teske may have made a  
19 comment.

20 Q. Okay. Do you remember what comment  
21 Judge Teske made?

22 A. I don't.

23 Q. Do you recall what year this was?

24 A. No, I'm sorry, I don't.

25 Q. If I said 2011, would that sound kind of

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1 right or way off?

2 A. That seems a little off --

3 Q. Okay.

4 A. -- as I recall, but --

5 Q. You think it was earlier?

6 A. Maybe a little earlier.

7 Q. Okay. Did David Santiago report directly  
8 to you?

9 A. He did.

10 Q. Were you written up as a result of this  
11 allegation?

12 A. No, and there was nothing mentioned in my  
13 performance review.

14 Q. Okay.

15 So was it not the case that you were  
16 written up, but then there was an agreement to  
17 delete the write-up and destroy it as long as the  
18 pictures were deleted?

19 A. I recall John Johnson telling me that he  
20 kept a file on everyone, and yes, something that he  
21 would put in my file. And something about it -- it  
22 can go away or something to that effect.

23 Q. Okay.

24 Did you understand this to mean, like, his  
25 own personal file, as opposed to, like, personnel

1 file?

2 A. What I can say is, I think most employees  
3 at the juvenile court knew that Mr. Johnson kept his  
4 own personal files on each of us.

5 Q. Okay. But you never saw anything on -- in  
6 writing referring to this?

7 A. Not in my file, no.

8 Q. Okay. Or anywhere else? Did you see  
9 anything in writing anywhere else?

10 A. Not that I recall.

11 Q. Okay.

12 Is it true that there were nude  
13 photographs found on your computer at the time of  
14 your termination?

15 A. I -- I don't know that. I was asked to  
16 remove my thing -- my personal belongings, and that  
17 was earlier in the day. And I believe --

18 Q. Mm-hmm.

19 A. -- my computer was locked, so I -- I don't  
20 know.

21 Q. Did you have nude photographs on your work  
22 computer at the time of your termination?

23 A. No.

24 Q. Okay.

25 A. Not that I'm aware of.

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1 Q. You'd agree that if someone in management  
2 was looking for a reason to get rid of you, they  
3 could have done it during any of the times that  
4 there were these employee complaints that we just  
5 discussed; right?

6 MR. MEW: Object to form.

7 THE WITNESS: What I know is what happened  
8 to me, and that was after my performance  
9 reviews. Then joining a gay recreational  
10 softball league, I was wrongfully terminated.

11 BY MR. HILL:

12 Q. With that termination, is it your belief  
13 that someone was looking for a reason to terminate  
14 you and then seized upon the gay softball league as  
15 a reason to get rid of you?

16 MR. MEW: Object to form.

17 THE WITNESS: I know what I experienced.  
18 And I stand by, I was terminated because of my  
19 sexual orientation. And then I was being  
20 discriminated against because I had joined the  
21 gay recreational softball league and was  
22 promoting a county program within that league,  
23 and also, in and around the Atlanta area,  
24 deemed to be gay.

25 BY MR. HILL:

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1 Q. Okay. You don't believe that anyone wanted  
2 to terminate you before you joined the gay softball  
3 league; right?

4 MR. MEW: Object to form.

5 THE WITNESS: Well, we just were looking  
6 at my performance reviews. And looking back, 48  
7 out of 50. My very last performance review was  
8 very similar.

9 BY MR. HILL:

10 Q. Mm-hmm.

11 A. The reviews prior to that, one that you've  
12 shared with me, was a 46 out of 50. Again, there  
13 were employees with much lower scores.

14 So I think it's fair to say that a person  
15 with not even average reviews but good to excellent  
16 reviews would be fired after -- in my case, after  
17 joining the gay recreational --

18 Q. Mm-hmm.

19 A. -- softball league.

20 Q. Yeah. Okay.

21 All -- all I'm asking, really, is just a  
22 -- just as far as what you believe -- if you believe  
23 that someone was looking for a reason to get rid of  
24 you before you joined this gay softball league.

25 MR. MEW: Same objection.

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1 BY MR. HILL:

2 Q. Do you believe that or not?

3 A. I don't know. I can't answer that.

4 Q. Okay.

5 A. All I can state is -- and testify to is  
6 what I experienced and the homophobic action that  
7 was taken by Clayton County.

8 Q. Okay. But since you don't know, then it's  
9 not your belief; right?

10 MR. MEW: Yeah, object to form. Misstates  
11 what he said.

12 BY MR. HILL:

13 Q. Well, I'm just asking him.

14 A. It is my belief that I was discriminated  
15 against based on my -- excuse me -- my sexual  
16 orientation.

17 Q. Right. No, I get that.

18 All I'm just asking is, is it your belief  
19 that someone was looking for a reason to terminate  
20 you before you joined the gay softball league?

21 MR. MEW: Asked and answered.

22 THE WITNESS: I can't answer how somebody  
23 else thought or -- excuse me.

24 BY MR. HILL:

25 Q. But as far as your -- as far as your



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1 belief, that's not something that you believe in  
2 your head right now; right?

3 A. My belief is that --

4 MR. MEW: Objection --

5 THE WITNESS: I was discriminated against  
6 --

7 BY MR. HILL:

8 Q. Okay.

9 A. -- based on my sexual orientation.

10 Q. When did you first come to believe that  
11 you were terminated because of your sexual  
12 orientation?

13 A. About the time of the audit, which would  
14 have fallen in the month of April of 2013, and then  
15 some of the questions that were being presented to  
16 me.

17 Q. So before the termination happened, you  
18 believed it was -- that you were going to be  
19 terminated; right?

20 A. During that time period, I began to, what  
21 I would consider, putting pieces of the puzzle  
22 together. And it did feel like -- that the decisions  
23 being made about my career with the county were  
24 based on my sexual orientation. And since that time,  
25 the testimony and some of the documents presented

1 have, to me, verified that belief.

2 Q. I'll show you what I'm marking as  
3 Defendant's Exhibit 16. So this is a form with  
4 information that you submitted to the department --  
5 Georgia Department of Labor; correct?

6 A. Yes, I believe so.

7 (Exhibit Number 16 marked for  
8 identification.)

9 BY MR. HILL:

10 Q. And the responses in here, you wrote these  
11 yourself; correct?

12 A. Yes.

13 Q. Okay. So all this information is true?

14 A. Yes.

15 Q. Okay.

16 And in this form, you don't say anything  
17 about believing you were terminated because of your  
18 sexual orientation; do you?

19 A. It's not explicitly listed in this  
20 document, no.

21 Q. Okay.

22 After question Number 3, there's a  
23 sub-question that says, "If you do not think the  
24 above reason was why you were discharged, give the  
25 reason you feel you were discharged. Explain in

1 detail."

2 And your response is, "Chief Juvenile  
3 Court Judge wanted to have someone else in the  
4 position. Was overheard two months ago telling  
5 colleague he was going to get rid of me. Performance  
6 review was completed in May 2013."

7 A. That is correct.

8 Q. Right.

9 And the person you're referring to,  
10 "Because they wanted to have someone else in the  
11 position," you're talking about Carol Gossett there;  
12 right? That's the someone else?

13 A. That was my belief, yes.

14 Q. Okay. And this -- that sentence I just  
15 read, that's based on what Griffin Shirley told you;  
16 correct?

17 A. Yes. His --

18 Q. Okay.

19 So he is the person who overheard  
20 two months -- no. Sorry.

21 He is the person who allegedly overheard  
22 Judge Teske telling someone he was going to get rid  
23 of you; right?

24 A. That is correct. He came to me after the  
25 golfing tournament.

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1 Q. Okay. When did that happen, that he came  
2 to you?

3 A. Would have been in April, I think is when  
4 that tournament occurred.

5 Q. Okay.

6 And at the time that you filled this out,  
7 this was your belief that Judge Teske got rid of you  
8 because he wanted to replace you with Carol Gossett;  
9 right?

10 MR. MEW: Object to form.

11 THE WITNESS: As part of it, yes.

12 BY MR. HILL:

13 Q. Okay. You still believe today that  
14 Judge Teske wanted you out of the position and Carol  
15 Gossett in the position?

16 A. Yes, based on not being happy with me  
17 participating in the gay recreational softball  
18 league and promoting the program within, not only  
19 the league but also in what he deemed to be gay  
20 Midtown.

21 Q. The reason you don't mention sexual  
22 orientation as a reason for your termination in this  
23 document is because it would not make sense to say  
24 that you were terminated because of your sexual  
25 orientation when you're saying that Judge Teske

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1 wanted to have someone else in the position who also  
2 was gay; right?

3 MR. MEW: Object to form.

4 THE WITNESS: Okay. Bear with me. Can you  
5 repeat the question?

6 MR. HILL: Can you read back the question,  
7 please?

8 THE COURT REPORTER: The reason you cannot  
9 say that the reason for your termination in  
10 this document is because it would not make  
11 sense to say that your sexual orientation --  
12 hold on a second.

13 Let me just -- the reason you do not  
14 mention sexual orientation as a reason for your  
15 termination in this document is because it  
16 would not make sense to say that you were  
17 terminated because of your sexual orientation  
18 when you are saying that Judge Teske wanted to  
19 have someone else in the position who was also  
20 gay; right?

21 MR. MEW: Same objection.

22 THE WITNESS: If my memory is correct, I  
23 had not secured legal counsel --

24 BY MR. HILL:

25 Q. Mm-hmm.

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1           A.     -- on this matter, and my plan was to file  
2 with the EEOC.

3           Q.     Mm-hmm.

4           A.     Therefore, I -- I did not go into any  
5 specific detail on this document as I was waiting  
6 for legal representation from my attorney.

7           Q.     Why would you wait for legal  
8 representation before going into detail in this  
9 document?

10          A.     Because of my belief that I was  
11 discriminated against. And although I was familiar  
12 with the EEOC, I wasn't completely familiar with all  
13 of the options and the -- the terminology of the --  
14 the complaint for EEOC.

15          Q.     Okay.

16                 If -- if an employer terminates an  
17 employee who happens to be gay and then replaces  
18 that employee with someone else who also is gay,  
19 does it really makes sense to say that the person  
20 who lost his job, that it's because he was gay?

21                 MR. MEW: Object to form.

22                 THE WITNESS: Well, considering this  
23 individual was a closeted gay and did not have  
24 her lifestyle openly displayed, I think factors  
25 in, but --

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1 BY MR. HILL:

2 Q. Okay.

3 So in this lawsuit, do you contend that  
4 you were terminated because you were openly gay and  
5 replaced by someone who was not openly gay?

6 MR. MEW: Object to form.

7 THE WITNESS: I contend it's when I joined  
8 the Hotlanta Softball League, and yes, started  
9 promoting the -- the county program within the  
10 league. Specifically, my team, and also what  
11 was deemed to be gay Midtown.

12 BY MR. HILL:

13 Q. Okay. But you think the being openly gay  
14 is, like, the determinative factor for your  
15 termination?

16 MR. MEW: Object to the form.

17 THE WITNESS: I believe what happened to  
18 me, and that is I was terminated because of my  
19 sexual orientation.

20 BY MR. HILL:

21 Q. Okay. But let me put it this way.

22 Ms. Gossett is white; right?

23 A. Yes.

24 Q. You're white; right?

25 A. Correct.

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1 Q. So if you were saying, I think I was  
2 terminated because I was white, that doesn't really  
3 make sense; right?

4 MR. MEW: Object to form.

5 BY MR. HILL:

6 Q. Because you're both white; right?

7 A. I can't speculate on that. I'm -- I -- I  
8 know and can testify to what had happened to me.

9 Q. Okay.

10 Let's say you had a straight man who lost  
11 his job and then got replaced by a straight woman.  
12 Would it make sense at all to say that the straight  
13 man lost his job because he's straight?

14 MR. MEW: Object to form, speculative.

15 THE WITNESS: Again, I can't speculate. I  
16 know what happened to me.

17 BY MR. HILL:

18 Q. Okay.

19 You don't have any reason to believe that  
20 Judge Teske has a preference for gay women over gay  
21 men; do you?

22 MR. MEW: Same objection.

23 THE WITNESS: I don't know.

24 BY MR. HILL:

25 Q. Okay.



1 I'm going to show you what I'm marking as  
2 Defendant's Exhibit 17. This is a document produced  
3 to us by the Georgia Department of Labor. Have you  
4 seen this before?

5 A. It does not look familiar, no.

6 (Exhibit Number 17 marked for  
7 identification.)

8 BY MR. HILL:

9 Q. Okay.

10 Just read that short paragraph for a  
11 second. Does it accurately reflect statements that  
12 you made to the Department of Labor investigator in  
13 the course of your unemployment claim?

14 A. Well, there appears to be a lot of typos  
15 in this wording and some mistakes referencing a  
16 baseball team.

17 Q. I know it's probably not intended to be,  
18 like, an exact transcript. But does it generally  
19 reflect accurately what you discussed with the  
20 Department of Labor investigator?

21 A. Somewhat, yes. Again, given all the  
22 mistakes and discrepancies, I'm -- I'm not convinced  
23 this is a very good document, but --

24 Q. The statement at the top where it says, "I  
25 used non-profit money." You see where I'm talking

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1 about?

2 A. I do.

3 Q. The GAL funds were not non-profit money;  
4 were they?

5 A. Yes, those were FCCC funds.

6 Q. Well, they were service fees assessed by  
7 the court; right?

8 MR. MEW: Object to form.

9 THE WITNESS: To be given to FCC (sic) for  
10 use of recruitment, training, and retention.

11 BY MR. HILL:

12 Q. Right. FCCC was holding the funds that  
13 they were service fees assessed by the court; right?

14 A. They --

15 MR. MEW: Same objection.

16 THE WITNESS: They were assessed by the  
17 court and given to the Friends of Clayton  
18 County CASA. They did not go through county  
19 finance.

20 BY MR. HILL:

21 Q. Okay. They weren't charitable donations,  
22 though; were they?

23 A. No, but the FCCC is -- was considered a  
24 charitable organization.

25 Q. Near the bottom, maybe a couple sentences

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1 up -- four lines up, it says, "I spoke to a board  
2 member about the ideal --" I think it should have  
3 been deal.

4 "I spoke to a board member about the  
5 ideal, and they were okay with it."

6 Talking about Sabrina Crawford as the  
7 board member?

8 A. Yes, Sabrina Crawford gave approval, as  
9 did Guy Alexander, who was also a board member.

10 Q. Okay. Anybody else on the board who gave  
11 approval?

12 A. I don't know.

13 Q. Okay. And they approved it because it  
14 wasn't the board's money; right?

15 A. The conversation I recall is they approved  
16 it because they thought it was a good idea to have  
17 that opportunity to recruit, especially males, in  
18 such a large number because the Hotlanta Softball  
19 League is like the second largest league in the  
20 country.

21 Q. You say in here that the \$250 were given  
22 back to the court; is that true?

23 A. That is my understanding. Apparently, the  
24 coach for the Honey Badgers contacted the court and  
25 said, based on my termination, that they did not

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1 want the money, and they wanted it to be returned  
2 where it came from.

3 Q. Okay. Did you ever see any documentation  
4 produced in discovery in this case showing that \$250  
5 being returned?

6 A. I don't recall seeing that, no.

7 Q. Okay. Do you know to which account that  
8 \$250 was returned?

9 A. I was terminated. I don't -- I don't know  
10 what happened after I left the building.

11 Q. Okay. I'll show you Defendant's  
12 Exhibit 18. Have you ever seen this document before?

13 A. I don't believe so.

14 (Exhibit Number 18 marked for  
15 identification.)

16 BY MR. HILL:

17 Q. Is that Guy Alexander's signature at the  
18 bottom?

19 A. It appears to be, yes.

20 Q. Read over this document. But after you do,  
21 it does not say anything about him approving your  
22 use of GAL funds for the softball team; does he?

23 A. Not in those words, no.

24 Q. In the fourth paragraph, it sounds like  
25 he's saying that you just told him about the

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1 softball team and that CASA was helping with the  
2 sponsorship; right?

3 MR. MEW: Object to form.

4 THE WITNESS: No, it was a direct ask. As  
5 far as his opinion and his thoughts, we had a  
6 meeting scheduled because Mr. Alexander was  
7 involved in a lot with our program. And he was  
8 also involved on the State level with Georgia  
9 CASA, sponsoring some of their events.

10 But the company he was with at the time  
11 was Crown Distributing. And so I had talked to  
12 him about the idea of sponsoring the Hotlanta  
13 Softball Team and explained to him the benefits  
14 as far as recruitment, retention, and training.  
15 And he thought it was a good idea.

16 And he suggested because I was going to  
17 use the GAL money, that I also run it by  
18 Sabrina Crawford. And if she were in agreement,  
19 that he would support that. He did decide not  
20 to be a sponsor of the team.

21 But what he did agree to do would be host  
22 a reception or a picnic at the end of the  
23 season and have -- I could have the guys all  
24 get together from the team, and that he would  
25 sponsor that event but not as an official

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1 sponsor of the team. Mostly because he was  
2 already committed to working with Georgia CASA  
3 on a project with his company.

4 BY MR. HILL:

5 Q. Did he tell you that's the reason he did  
6 not -- that he declined your invitation for Georgia  
7 Crown Distributing to sponsor the team?

8 A. As I recall, yes.

9 Q. Because he was already involved in other  
10 capacities?

11 A. Seems like that's how the conversation  
12 went, yes.

13 MR. MEW: Hey, before you start that  
14 exhibit --

15 MR. HILL: Yeah.

16 MR. MEW: -- can we -- I got -- I got to  
17 take a little break if that's okay.

18 MR. HILL: You got to cut out the Coke  
19 Zeros.

20 MR. MEW: Yeah, you got to cut out the  
21 seven-hour depositions. This could all be done.

22 THE VIDEOGRAPHER: The time is 5:44. We  
23 are going off the video record now.

24 (A break was taken.)

25 THE VIDEOGRAPHER: The time is 5:59. We

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1 are back on the video record.

2 BY MR. HILL:

3 Q. Okay. Mr. Bostock, I'm showing you what  
4 I'm marking as Defendant's Exhibit 19. Is this an  
5 e-mail you sent to Guy Alexander?

6 (Exhibit Number 19 marked for  
7 identification.)

8 MR. BUECHNER: Is that 19, Mike?

9 THE COURT REPORTER: Yes.

10 MR. HILL: Yes, that's 19.

11 THE WITNESS: It appears to be.

12 BY MR. HILL:

13 Q. Okay.

14 A. Yes.

15 Q. I'm going to show you what I'm marking as  
16 Defendant's Exhibit 20. Have you ever seen this  
17 e-mail before?

18 A. I believe so, during review of the  
19 documents -- during -- that you provided during  
20 production.

21 (Exhibit Number 20 marked for  
22 identification.)

23 BY MR. HILL:

24 Q. Had you ever seen this e-mail before this  
25 litigation?

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1 A. No, I had not.

2 Q. No one ever told you about this e-mail  
3 when it came in?

4 A. No.

5 Q. Okay. Oh, yeah. This is the same --

6 MR. MEW: The one you handed me was 19.  
7 This is 20.

8 MR. BUECHNER: Okay.

9 BY MR. HILL:

10 Q. Are -- the allegations in this circled  
11 part at the bottom about how GAL funds were spent,  
12 are these allegations true?

13 A. I don't believe them to be true, no.

14 Q. Okay. Do you have any reason to -- strike  
15 that.

16 Do you believe Shawn Black is being  
17 untruthful with these allegations?

18 A. Yes, and overexaggerating.

19 Q. Okay. Do you have any idea, in your mind,  
20 why he would do that?

21 MR. MEW: Object to form.

22 THE WITNESS: I believe his intent behind  
23 this was to lash out that he ended up having  
24 his position at the court get dissolved because  
25 of lack of funding. And I think he took it out



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1           on me purposely, as if it were my fault, that  
2           the funding had gone away.

3 BY MR. HILL:

4           Q.    You're familiar with the concept of a  
5 whistleblower; right?

6           A.    Yes.

7           Q.    Okay. Would you agree Shawn Black is  
8 acting as a whistleblower with this e-mail?

9                   MR. MEW: Object to form.

10                   THE WITNESS: I believe he's acting as a  
11 disgruntled employee.

12 BY MR. HILL:

13           Q.    Whether the allegations in this e-mail are  
14 true or not, would you agree that the county had a  
15 duty at least to look into them to see if they're  
16 true?

17                   MR. MEW: Object to form.

18                   THE WITNESS: Well, no one came to me and  
19 talked to me about any of these allegations, so  
20 --

21 BY MR. HILL:

22           Q.    But would you agree that the county had a  
23 duty to look into these allegations to see if  
24 there's any truth to them?

25                   MR. MEW: Same objection.

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1 THE WITNESS: My response to that would  
2 be, I don't know. I don't -- I can't respond as  
3 to what the county would think or not think.

4 BY MR. HILL:

5 Q. You have no thoughts on the matter --

6 MR. MEW: Object to form.

7 MR. HILL: -- one way or the other?

8 MR. MEW: Object to form.

9 THE WITNESS: No.

10 BY MR. HILL:

11 Q. Okay. You don't believe Shawn Black had an  
12 issue with you because of your sexual orientation;  
13 do you?

14 A. As I've stated, I think his attitude  
15 towards me was because he lost his position due to  
16 lack of funding.

17 Q. Other than what we've discussed in this  
18 deposition today about Shawn Black, were there any  
19 other sources of, like, friction between you two?

20 A. Not that I'm aware of, no.

21 Q. Okay.

22 A. And that's evidenced by, I was invited to  
23 participate in a garage sale that he had at his  
24 residence prior to him being terminated. And some of  
25 the other CASA staff also participated.

1 I also had received an e-mail from  
2 Mr. Black before his termination that it was  
3 somebody's birthday. I don't recall if it was Becky  
4 Galbraith's birthday or if it was his sister's  
5 birthday. But he had invited me to catch up with  
6 some of them to go out and to have a cocktail.

7 Q. When did you first read the audit report?

8 A. I was not privy to the audit until it was  
9 submitted to my legal team.

10 Q. Okay. You never saw it during your  
11 employment?

12 A. No, no one showed me the audit or  
13 discussed any of the findings with me.

14 Q. Okay. You had an interview, at one point,  
15 with Stacey Merritt; is that right?

16 A. That is correct.

17 Q. Was anyone else in that interview?

18 A. I don't recall anyone else, but I want to  
19 say there were maybe at least two meetings that I  
20 had with Stacey.

21 Q. Okay.

22 A. But again, I -- I only recall meeting with  
23 her. And maybe in the second meeting, a second  
24 auditor was present.

25 Q. Okay.

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1           A.    I -- I -- I'm not a hundred percent sure  
2    on that, though.

3           Q.    Lesley Moore, does that name sound  
4    familiar?

5           A.    It only sounds familiar because I saw that  
6    name as it relates to the audit and --

7           Q.    Mm-hmm.

8           A.    -- to some of the other audits that I had  
9    mentioned where there was poor development and  
10   implementation of the grants.

11          Q.    The second auditor, was it a -- a black  
12   woman?

13          A.    I don't recall.

14          Q.    Okay. Do you know who Juan Sanchez is?

15          A.    Yes, he was the manager of F.R.O.G.S  
16   Cantina in Midtown.

17          Q.    Is it true that around the time of your  
18   termination, you had started a -- got involved in a  
19   romantic relationship with Mr. Sanchez?

20               MR. MEW:  I'm going to object to that.

21           And, Gerald, I don't want you to answer that  
22   question right now. We're not getting into this  
23   guy's sex life. His sexual orientation is at  
24   issue. Not his romantic life or his sex life or  
25   anything else.

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1 MR. HILL: What's the base --

2 MR. BUECHNER: I think it's relevant to  
3 the -- perfectly relevant -- perfect question  
4 because his name has come up in some of the  
5 expenses.

6 MR. MEW: Oh, I'm sorry. I thought we were  
7 one cowboy, one rodeo. Then I'm bringing in my  
8 cowboy, too then. I think that the -- I think  
9 that the answer is that none of that has to do  
10 with anything.

11 The case is about whether he was  
12 discriminated against based on his sexual  
13 orientation. It's not about his personal life,  
14 who he did or didn't date, or anything else.

15 MR. HILL: There was a lot of testimony  
16 during Judge Teske's deposition that he  
17 believed some of the expenses were personal  
18 social outings and possibly even, like,  
19 romantic dates. There was -- that was -- you  
20 guys spent a long time on that.

21 MR. MEW: Yeah, but that's his --

22 MR. HILL: So if that's --

23 MR. MEW: -- prejudicial assumption that  
24 because Gerald's gay, he must be visiting old  
25 boyfriends. He couldn't identify anyone in his

1 testimony that had anything to do with that.

2 MR. HILL: Well -- so I can ask him about

3 --

4 MR. BUCKLEY: We're going to have to do it  
5 in front of the court.

6 MR. HILL: -- that, though.

7 MR. BUCKLEY: We are not going to --

8 MR. HILL: Are you serious?

9 MR. BUCKLEY: Yeah, we are not -- he is  
10 not going to testify about his sex life; okay?  
11 So if you want to ask him a question about his  
12 sex life or romantic life or anything like  
13 that, he's going to have an instruction not to  
14 answer the question.

15 MR. HILL: It goes directly to why there  
16 would have been some expenses --

17 MR. BUCKLEY: You're assuming that --

18 MR. HILL: -- at this place.

19 MR. BUCKLEY: -- because he's gay, that he  
20 must have been in a romantic relationship with  
21 everybody he was having lunch with. And he's  
22 not going to testify about who he ever had sex  
23 with in his life. He's not --

24 MR. HILL: I'm not asking that. And I'm  
25 not making any assumptions. I'm asking him the

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1 question.

2 MR. BUCKLEY: Well, I know you're asking  
3 him the question. And we are going to give him  
4 an instruction and have given an instruction  
5 not to answer. Period. Full stop.

6 If you ask again, the same instruction  
7 will be given, and he will not testify about  
8 that. And if you want to -- to -- you know,  
9 take it up with the court.

10 MR. HILL: Well, it's too late to call the  
11 judge right now.

12 MR. MEW: Well, if we decide to go down  
13 that road, we'll take --

14 MR. BUCKLEY: If you decide to go down  
15 that road. But I mean -- but I -- I just think  
16 it's -- it's entirely irrelevant. Teske's  
17 assumptions are Teske's assumptions, and they  
18 speak to Teske's prejudice. But that's not  
19 something that's relevant in this case.

20 MR. MEW: And his testimony made it clear  
21 he didn't have any basis for those assumptions  
22 anyway, so --

23 MR. HILL: Okay. We'll pass that and  
24 explore whether to go take it up with the  
25 court.

1 BY MR. HILL:

2 Q. We talked about the termination meeting  
3 earlier. That was you and Judge -- I mean, you and  
4 John Johnson and Colin Slay; correct?

5 A. That is correct.

6 Q. Okay.

7 And I think what you've testified to is,  
8 there was a statement that you said, I know what  
9 this is about. And John Johnson said, it's not  
10 because you're gay; right?

11 A. That is correct.

12 Q. Anything else said at this termination  
13 meeting?

14 A. My understanding -- or my memory of that  
15 meeting was, at that point, I was actually handed  
16 the pink termination slip. And I was told that I was  
17 still in possession of a county phone and that I  
18 needed to exit the property, and that Mr. Slay would  
19 accompany me to the parking lot to retrieve the  
20 county phone. And that was the end of the meeting,  
21 as I recall.

22 Q. The first job you had after your  
23 termination from Clayton County was the Neiman  
24 Marcus position; right?

25 A. That is correct. That was about, I think,



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1 six months after my termination.

2 Q. What did you do to find other jobs before  
3 that position?

4 A. Well, because my unemployment had been  
5 approved, I was under the regulations of the  
6 Department of Labor. And so there was mandatory work  
7 search. So I did both internet, face-to-face  
8 contacts to try to apply for available positions  
9 that I was qualified for.

10 Q. Did you ever try to find another job with  
11 a CASA organization in another county?

12 A. No, I did not. Not that I recall.

13 Q. Why not?

14 A. Probably because, number one, I wasn't  
15 going to -- I wasn't willing to relocate at the time  
16 and just decided I would pursue other employment  
17 opportunities.

18 Q. Did you not want to work at another CASA  
19 organization?

20 A. That might be a fair statement. I don't  
21 know.

22 Q. And you still have contacts in the Georgia  
23 CASA community; right?

24 A. I do.

25 Q. And certainly, there are people in --

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1 within that community who believe you were  
2 wrongfully terminated; right?

3 A. I think that's reasonable.

4 Q. Sitting here today, would you want to work  
5 for a CASA organization again?

6 A. I would probably entertain the -- the  
7 possibility.

8 Q. Have you made any efforts to do that, to  
9 work for another CASA organization in the last  
10 two years?

11 A. No, I'm -- I'm very happily employed with  
12 my current employer. I did shift from working with  
13 and advocating for children to working with and  
14 advocating for adults in the mental health system.

15 Q. To go back for a second to when you were  
16 still working at Clayton County, was there a time  
17 around the end of 2012 when there was less money  
18 than usual available for, like, a volunteer  
19 appreciation event?

20 A. No, I'm not aware of any. The FCCC always  
21 did an amazing job with our volunteer events.

22 Q. So -- well, were there any volunteer  
23 appreciation events that happened at the end of the  
24 year that the GAL account funded?

25 A. No, those were typically held within the

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1 month of April, which is when National Volunteer  
2 Week falls every year. And so sometime around that  
3 month, the FCCC would start having conversations  
4 about what are we going to do this year for our  
5 volunteer recognition event?

6 Q. Was there, like, a tradition of getting  
7 polo shirts for newly sworn-in volunteers?

8 A. No, that was not a tradition.

9 Q. Did Clayton County CASA ever give polo  
10 shirts to any -- anybody?

11 A. They did.

12 Q. Who received polo shirts?

13 A. The staff certainly received, so that when  
14 we were doing various events or attending various  
15 functions, we could wear the -- the CASA shirt. And  
16 when I say that, it would have the Clayton County  
17 CASA logo usually on the -- in the -- on the front  
18 in the chest area.

19 I know for the Atlanta Braves event that,  
20 if I'm not mistaken, the Metro Collaborative  
21 provided all of the attendees a Metro Atlanta CASA  
22 T-shirt that had the logo with all the counties  
23 listed on the front. And maybe on the back, it had  
24 -- or that was on the back. And on the front had the  
25 Atlanta Braves logo with permission of the Braves.

1                   When we would have, like, CASA Day at the  
2 Capitol, when we were planning that event every  
3 year, that occurred in February, for our volunteers  
4 that would attend, we would try to ensure that they  
5 had CASA shirts to wear that represented Clayton  
6 County on -- on the logo.

7           Q.     Was -- was there a time when you did not  
8 have enough money to fund these polo shirts?

9           A.     No, because if -- usually, the FCCC would  
10 purchase the shirts, or if we had a grant that  
11 allowed for marketing expenses, we would use that. I  
12 -- I think what you may be confusing is each  
13 volunteer was given a CASA pin that they could --  
14 for a man, could put it on their lapel, or for a  
15 female, she would wear it to the court and when they  
16 went out into public.

17           Q.     Was there a time when the GAL account  
18 didn't have enough money to fund these CASA pins?

19           A.     Again, FCCC would purchase those.

20           Q.     Okay. Was there a year when the FCCC did  
21 not purchase them for some reason?

22           A.     Not during my tenure with the county.

23           Q.     Okay.

24                   You're claiming in this lawsuit that your  
25 termination resulted in some emotional distress to

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1 you; correct?

2 A. That is correct.

3 Q. How has this emotional distress manifested  
4 itself?

5 A. Well, certainly, it was stressful. Imagine  
6 losing your livelihood and your insurance when  
7 you're recovering from cancer. And the number one  
8 enemy for a cancer patient is stress. So there was  
9 obviously the physical component.

10 There is also the financial stress of  
11 having to depend on six months of unemployment to  
12 not only provide funds for your mortgage payment but  
13 also your car payment and your bills and other  
14 financial commitments.

15 And then there was the emotional side of  
16 it. And I did end up speaking with a licensed social  
17 worker at Emory Hospital as a recommendation from my  
18 oncologist, Dr. Godette, who had visibly noted that  
19 I was depressed and was struggling.

20 Q. Did you experience any loss of sleep?

21 A. A tremendous amount of loss of sleep?

22 Q. How long did that last?

23 A. Probably up until I started with Neiman  
24 Marcus six months later.

25 Q. Any, like, loss of appetite?

1 A. Absolutely.

2 Q. Did you experience any weight loss?

3 A. Probably, yes.

4 And if I can go back, additionally, when I  
5 saw the licensed social worker at Emory, per the  
6 recommendation of Dr. Godette, I had made some  
7 comments and was referred to a psychiatrist at Emory  
8 Hospital.

9 Q. And did you go to this psychiatrist?

10 A. I did.

11 Q. What's the psychiatrist's name?

12 A. I honestly don't remember. It would be in  
13 my medical record, I suppose. But I went for one  
14 session, and the psychiatrist did an assessment, and  
15 that was the extent of my involvement with her.

16 Q. Okay. One session in --

17 A. That's correct.

18 Q. -- 2013?

19 A. Correct.

20 Q. And how long did you go to this licensed  
21 social worker?

22 A. I met with him probably four to six  
23 sessions.

24 Q. Okay. All in 2013?

25 A. I believe so, yes.

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1 Q. And at the time of your termination, you  
2 were in recovery from cancer; is that right?

3 A. That is correct.

4 Q. Was there still any treatment associated  
5 with that?

6 A. I was -- I was still seeing -- I wasn't --  
7 I went to see both my oncologist and my urologist,  
8 but it -- it started out frequent visits, and then  
9 it -- as each month passed, it -- it reduced.

10 Q. Do you still have visits related to cancer  
11 recovery?

12 A. I have not. I've been told I'm  
13 cancer-free.

14 Q. Okay. As of, like, what year have you been  
15 cancer-free?

16 A. I think my last doctor's visit may have  
17 been in 2015.

18 Q. Okay. The cancer diagnosis also is  
19 stressful; right?

20 A. Of course, yes.

21 Q. So some of the emotional distress you  
22 experienced during this period would be attributable  
23 to being in recovery from cancer; right?

24 MR. MEW: Object to form.

25 THE WITNESS: After my termination; is

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1           that --

2       BY MR. HILL:

3           Q.     Yeah.

4           A.     -- your question?

5           Q.     Yes.

6           A.     I -- I feel as though the termination  
7     created that additional stress. I had everything  
8     under control and felt as though -- and even my  
9     doctors would agree, that I was doing well in my  
10    recovery and physically feeling well.

11          Q.     Were you feeling any emotional distress as  
12    a result of the cancer diagnosis or recovery before  
13    your termination?

14          A.     Not so much. More so tiredness.

15          Q.     If you didn't mention already, the name of  
16    the licensed social worker you were meeting with.

17          A.     I honestly would have to go back into my  
18    records and look. I -- I don't recall his name.

19          Q.     Okay. What about the urologist?

20          A.     That was Midtown Urology.

21          Q.     Do you remember the doctor's name?

22          A.     Yes, his name was Dr. Alphonse.

23          Q.     And did you say that the last time you saw  
24    him was 2015?

25          A.     I'm -- I'm guessing it was around that



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1 time. They had told me to expect about a three-year  
2 period of recovery to be fully recovered unless  
3 there were any types of complications. And that they  
4 would track just to stay on top of it, but again,  
5 the office visits began to decrease as each month  
6 went by.

7 Q. Were there any other medical conditions  
8 that contributed to your emotional distress  
9 following your termination?

10 A. No, I don't believe so.

11 Q. Okay.

12 After your termination, did you have any  
13 discussions with friends or family, or other loved  
14 ones about the emotional distress you were  
15 experiencing?

16 A. Mostly my mother.

17 Q. Is your mother still with us?

18 A. She is.

19 Q. Where does she live?

20 A. She resides in Cleveland, Georgia.

21 Q. What kind of discussions did you have with  
22 your mother about your emotional distress?

23 A. Well, she had been with me from the  
24 beginning of my diagnosis and was actually in the  
25 room with me when I got the actual diagnosis. So it

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1 was her continued love and support of checking on  
2 me. How are you feeling today? Is this week a better  
3 week than last week? Those kinds of conversations.

4 Q. And were -- so were those conversations  
5 mostly about your medical condition?

6 A. We spoke about a lot of things, but I did  
7 -- in answer to your question, I did speak to her  
8 about my stress level and --

9 Q. Did you talk with her specifically about  
10 your termination?

11 A. Of course, I did. She's my parent.

12 Q. Do you remember what you -- what you  
13 talked about with her regarding your termination?

14 A. I spoke with her that evening and told her  
15 that I had been terminated. The stated reason was  
16 conduct unbecoming of Clayton County employee, but  
17 that it was based on discrimination because of my  
18 sexual orientation. And she was quite upset.

19 Q. Did you ever have to undergo, like,  
20 surgery after your termination?

21 A. I have had surgery after termination. I  
22 think it was in 2019.

23 Q. Was this a stressful event?

24 A. The surgery?

25 Q. Yes. Yes.

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1           A.     It was a necessary surgery. It was an  
2 emergency surgery, and I recovered very quickly from  
3 it. So I don't recall any undue stress because of  
4 it.

5           Q.     Did it have anything to do with the  
6 prostate cancer?

7           A.     No, it was gallbladder-related.

8           Q.     Okay. Did you ever have to go through  
9 chemotherapy?

10          A.     No, I went through five weeks of external  
11 radiation --

12          Q.     Okay.

13          A.     -- daily.

14          Q.     And was that all before your termination?

15          A.     Yes, that was in 2012.

16          Q.     Okay. Do you currently own or rent your  
17 home?

18          A.     I own.

19          Q.     And how long have you been at your current  
20 address?

21          A.     Since November of 2014.

22          Q.     Okay. Do you have a mortgage?

23          A.     Yes.

24          Q.     What's, like, the monthly mortgage  
25 payment?

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1           A.    I want to say -- I believe it's either  
2    1,100 or 1,200.

3           Q.    And do you pay all of that yourself, or  
4    does anyone contribute to it?

5           A.    No, I have a partner now.

6           Q.    So do you split the payment for the  
7    mortgage?

8           A.    Pretty much our --

9           Q.    Do --

10          A.    I'm sorry.

11          Q.    With your partner, do you split the  
12   payment for the mortgage?

13          A.    We have our own accounts, but we -- we  
14   basically combine funds to cover any and all of our  
15   expenses.

16          Q.    Okay. Do you know the balance of the  
17   remaining loan on the house -- or the home?

18          A.    We recently did a refi (sic) to do some  
19   upgrades, and I believe it's right at or around  
20   200,000.

21          Q.    And you currently have health insurance;  
22   right?

23          A.    I do.

24          Q.    And you have health insurance through your  
25   work -- employment right now?

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1 A. That is correct.

2 Q. Okay.

3 Do you have a car payment?

4 A. My vehicle is paid off.

5 Q. Okay. Apart from the mortgage, any other  
6 regular monthly payment that you make?

7 A. I have a credit card that I pay off  
8 monthly.

9 Q. Okay. Anything else?

10 A. No.

11 Q. The automobile, when did that become paid  
12 off?

13 A. Probably in or around 20 -- end of 2017,  
14 maybe 2018.

15 Q. Okay.

16 A. I -- I believe 2018.

17 Q. Would you say you experienced any sort of,  
18 like, emotional distress from lack of -- lack of  
19 money for a period after your termination?

20 A. Absolutely, yes.

21 Q. How long did that last?

22 A. Well, I was able to breathe a sigh of  
23 relief when I landed the job at Neiman Marcus, even  
24 though it was considerably less than I was making  
25 with Clayton County.

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1 Q. And you got that position about six months  
2 after your termination; is that right?

3 A. That's correct.

4 Q. At the -- your job at Georgia Regional, at  
5 some point, you voluntarily requested a demotion to  
6 a lower-paying position; is that right?

7 A. That is correct.

8 Q. Well, why did you do that?

9 A. I had been doing the job of the treatment  
10 team facilitator, which I enjoyed immensely. The  
11 psychiatrist team that I was assigned to was a  
12 fantastic doctor. However, a position became  
13 available in the psychology department as a mental  
14 health counselor.

15 And I felt as though it would be a good  
16 opportunity for me to continue to learn, number one,  
17 but to also work more directly with the patients  
18 that were on my unit that I'm assigned to.

19 And when I went through the process, I  
20 didn't even realize initially that it was a lower  
21 paygrade. But during the application process for  
22 that, the chief of psychology had informed me that  
23 if I were offered the job, that he could do what he  
24 could to see if the State would be willing to  
25 increase the salary.



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1                   Mr. Bostock, right before the break, w  
2 were talking about financial stress resulting from  
3 your termination. Did you have a bank account at the  
4 time of your termination?

5                   A.     Yes.

6                   Q.     Did you have a -- did you have more than  
7 one account?

8                   A.     No, I believe it was just my checking  
9 account.

10                  Q.     Checking account.

11                   Do you recall what the balance was at the  
12 time of your termination?

13                  A.     No, I don't.

14                  Q.     Did it ever get overdrawn after your  
15 termination?

16                  A.     No, it did not.

17                  Q.     You didn't have a savings account at all?

18                  A.     At one point, I did, and I merged the two  
19 accounts. I don't exactly recall the reason. I don't  
20 think my return on the savings account was what I  
21 wanted, so --

22                  Q.     But that was before your termination?

23                  A.     Yes.

24                  Q.     The merger? Okay.

25                           What bank was that with?



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1 A. I bank with USAA.

2 Q. The same account today?

3 A. Yes.

4 Q. Okay. Did you -- you had a pension with  
5 the county? Did you --

6 A. Yes.

7 Q. Were you vested at the time of your  
8 termination?

9 A. Yes.

10 Q. Okay. Did you have to tap into your  
11 pension as a result of the termination?

12 A. I was forwarded paperwork from the county  
13 asking me to make a decision as to whether I wanted  
14 to, basically, cash out or to fill out paperwork to  
15 continue. But at that time, the EEOC investigation  
16 had begun, and I was instructed by the federal  
17 investigator not to speak with anyone in the  
18 administration of Clayton County.

19 Q. Okay.

20 A. So I did not respond to the paperwork that  
21 had been forwarded to me.

22 Q. Okay. And so you did not cash it out.

23 A. I have not cashed --

24 Q. Right?

25 A. -- it out.

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1 Q. Okay. So it's still there today?

2 A. That is correct.

3 Q. Okay. With your current employer, do you  
4 have any sort of retirement savings?

5 A. There is a retirement plan, yes.

6 Q. Is it like a 401(k)?

7 A. It is. So I make a certain contribution,  
8 and then the employer makes their contribution.

9 Q. Do you know how much your contribution is?

10 A. I don't right off. I don't -- I don't know  
11 the percentage that they take.

12 Q. Do you know, like, the dollar amount per  
13 month that you put in there?

14 A. I know it's less than what the State puts  
15 in.

16 Q. Less than what the State put in when --  
17 wait. Are you saying it's less -- you contribute  
18 less than your employer contributes?

19 A. Yes.

20 Q. Got it. Okay.

21 And -- but you don't know how much that  
22 is?

23 A. Not right off, I don't recall.

24 Q. Do you know what the balance is?

25 A. No, I don't.

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1 Q. Do you have any other source of savings  
2 besides county pension and this 401(k)?

3 A. I do from another former employer, the  
4 Northeast Georgia Regional Development Center.

5 Q. Do you know what the balance of that is?

6 A. It's probably maybe 17,000.

7 Q. Is that a 401(k)?

8 A. Yes. Yeah.

9 Q. Okay.

10 A. I think so.

11 Q. At any point after your termination, were  
12 you in a position where you had to, like, max out  
13 your credit cards?

14 A. No.

15 Q. Okay. And how many credit cards do you  
16 have?

17 A. I carry my main Mastercard -- or Visa  
18 through USAA, and that's the only card I use.

19 Q. Okay. Is that -- and that was the case  
20 back in 2013, also?

21 A. Pretty much. It -- as best I can recall,  
22 I've -- I've got other credit cards, but I don't use  
23 them.

24 Q. So after your termination, did you have to  
25 tap into any other source of funds other than your

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1 checking account?

2 A. A big chunk of my checking account did  
3 have to be used to make sure I maintained my home  
4 and car note and -- and the bills, but I also had  
5 some financial help from my mother.

6 Q. Okay. Do you know about how much financial  
7 help you got from your mother?

8 A. Maybe all total during that window of  
9 time, between the termination and Neiman Marcus,  
10 maybe about 800 to 1,000 if that.

11 Q. Okay. Do you know -- when you said a  
12 pretty big chunk of your checking account had to get  
13 depleted during that time, how much?

14 A. About 16,000.

15 Q. Okay. And that's -- you're talking about  
16 during the time from your termination until you  
17 started getting a paycheck from Neiman Marcus?

18 A. And a little beyond because I had to pay  
19 for COBRA Insurance, which was \$500. And my  
20 insurance with Neiman Marcus did not kick in, I  
21 don't believe, until January of 2014.

22 Q. Okay.

23 Do you know how much you pay in health  
24 insurance premiums now?

25 A. Not right off. I have a Kaiser Permanent

1 plan. And as best I can recall, that's one of the  
2 more affordable plans that the state of Georgia  
3 offers.

4 Q. Does your employer contribute to your  
5 health insurance premiums?

6 A. I imagine so, but I do make a -- you know,  
7 premium per pay period.

8 Q. Okay. Do you know how much the -- your  
9 employer contributes?

10 A. I don't.

11 MR. HILL: We don't have any further  
12 questions?

13 MR. MEW: Okay. I'm -- I'm going to be  
14 super brief follow-up.

15 MR. HILL: Sure.

16 DIRECT EXAMINATION

17 BY MR. MEW:

18 Q. Mr. Bostock, you testified a little bit  
19 earlier today about an interview that Mr. Teske gave  
20 to Richard Belcher at or around the time of your  
21 termination. Do you recall that testimony?

22 A. I do recall that.

23 Q. Did it cause you distress to hear  
24 Mr. Teske broadcast on the news media that you had  
25 misappropriated funds?

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1           A.     Yes, it did cause me a lot of distress. My  
2     -- my name, my reputation in that community that I  
3     had worked so hard to create the program, that the  
4     county juvenile court continually bragged about. It  
5     was embarrassing and very stressful.

6           MR. MEW:   Okay. That's -- that's all I  
7     have. Thank you, Mr. Bostock.

8                               RE-CROSS EXAMINATION

9     BY MR. HILL:

10           Q.     Real quick on the subject of interviews.  
11     You have given interviews to the media about this  
12     lawsuit; correct?

13           A.     I've given interviews about my termination  
14     due to my sexual orientation.

15           Q.     Okay. About how many media interviews do  
16     you think you've given?

17           MR. MEW:   What does this have to do with  
18     the scope of my redirect to him?

19           MR. HILL:   You were talking about  
20     interviews --

21           MR. MEW:   No.

22           MR. HILL:   -- that Judge Teske gave. So  
23     I'm talking about --

24           MR. MEW:   No, I'm speaking specifically  
25     about one on the emotional distress issue that

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1 you raised. Not the open-ended issue of how  
2 many interviews Judge Teske did or didn't give.

3 MR. HILL: You think that's beyond the  
4 scope?

5 MR. MEW: I do, yeah.

6 MR. HILL: Okay. We're done with the  
7 questions.

8 MR. BUCKLEY: Thank you.

9 THE VIDEOGRAPHER: This --

10 MR. BUECHNER: Where are we with --

11 MR. MEW: Yeah, thanks.

12 THE VIDEOGRAPHER: This concludes the  
13 deposition. The time is 6:51, and we're going  
14 off the video record.

15 (Deposition concluded at 6:51 p.m.)

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D I S C L O S U R E

Pursuant to Article 10.B of the Rules and Regulations of the Board of Court Reporting of the Judicial Council of Georgia, I make the following disclosure:

I am a Georgia Certified Court Reporter. I am here as a representative of Esquire Deposition Solutions. I am not disqualified for a relationship of interest under the provisions of O.C.G.A. 9-11-28(c).

I was contacted by the offices of Esquire Deposition Solutions to provide court reporting services for these proceedings. I will not be taking this deposition under any contract that is prohibited by O.C.G.A. 15-14-34 (a) or (b).

I have no exclusive contract to provide reporting services with any party to the case, any counsel in the case, or any reporter or reporting agency from whom a referral might have been made to cover this deposition.

I will charge my usual and customary rates to all parties in the case, and a financial discount will not be given to any party to this litigation.

DATED: October 26, 2021



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Stephen Mahoney  
Certified Court Reporter  
4921-4880-0199-0656



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CERTIFICATE

STATE OF GEORGIA

COUNTY OF COBB

I hereby certify that the foregoing deposition was reported as stated in the caption and the questions and answers thereto were reduced to writing by me; that the foregoing pages represent a true, correct, and complete transcript of the evidence given on October 14, 2021 by the witness, Gerald Bostock, who was first duly sworn by me.

I further certify that I am not of kin or counsel to the parties in the case; I am not in the regular employ of counsel for any of said parties; nor am I in anywise interested in the result of said case. The witness did reserve the right to read and sign the transcript.

DATED: October 26, 2021



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Stephen Mahoney  
Certified Court Reporter  
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E R R A T A S H E E T

I have read the foregoing transcript of my testimony given on October 14, 2021, and wish to make the following changes.

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Reason: \_\_\_\_\_

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Reason: \_\_\_\_\_

I wish to make no changes. \_\_\_\_\_

\_\_\_\_\_

Signed: Gerald Bostock, Deponent

Sworn and subscribed before me

This \_\_\_\_ day of \_\_\_\_\_

\_\_\_\_\_

NOTARY PUBLIC

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| 7523362 Ger<br>ald. | \$312     | 92:14,18          | 182:16            | 307:14        |
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| 7523362 Ger<br>ald. | \$33,000  | 254:24            | 24:10             | 306:6         |
| Bostock.            | 196:7     | <b>1,000</b>      | <b>12/07/2011</b> | <b>18</b>     |
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**ARTICLES OF INCORPORATION**  
**OF**  
**FRIENDS OF CLAYTON COUNTY CASA, INC.**

**ARTICLE I**

The name of the corporation is **Friends of Clayton County CASA, Inc. (FCCC)**. The corporation is organized pursuant to the provisions of the Georgia Non-Profit Corporation Code.

**ARTICLE II**

The term of existence of the corporation is perpetual.

**ARTICLE III**

The corporation shall be a voluntary, non-profit, charitable corporation; its purpose shall be exclusively charitable. FCCC will provide:

- a) ongoing support to the **Clayton County CASA** (Court Appointed Special Advocates) Program Director,
- b) increase public awareness of the program,
- c) help recruit volunteers;
- d) raise funds; and
- e) assist with volunteer recognition.

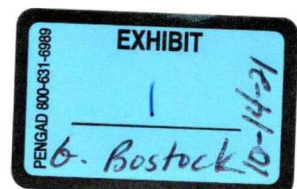
**ARTICLE IV**

The affairs of the corporation shall be managed by a Board of Directors. The method of electing the board of directors shall be determined by the By Laws of the corporation.

**ARTICLE V**

The mailing address of the initial principal office of the corporation is:

Friends of Clayton County CASA  
Clayton County Juvenile Court  
121 S. McDonough Street  
Jonesboro, GA 30236



**BY-LAWS**

**Of**

**FRIENDS of CLAYTON COUNTY  
CASA, INC.**

**ARTICLE I – NAME**

**Section 1.** The name of the organization shall be **Friends of Clayton County CASA, Inc.** (hereinafter referred to as **FCCC**). The organization known as Clayton County Court Appointed Special Advocates will hereinafter be referred to as **Clayton County CASA**

**ARTICLE II – PURPOSE AND MISSION**

**Section 1. Purpose and Mission**

The purpose and mission of the **FCCC** Board will be to provide ongoing support to the Program Director of the **Clayton County CASA** organization, increase public awareness of the program, help recruit volunteers, raise funds and assist with volunteer recognition. The purpose of the **Clayton County CASA** program is to provide trained, screened and supervised volunteers to advocate for the best interest of children involved in deprivation hearings in Clayton County and make recommendations to the judge. The **Clayton County CASA** volunteer provides an objective opinion while providing a consistent representative for the child.

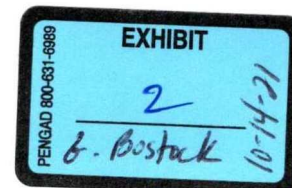
**ARTICLE III – BOARD COMPOSITION  
AND TERMS OF OFFICE**

**Section 1. General Powers**

A volunteer Board of Directors shall manage the business affairs of the corporation. In addition to the powers and authority expressly conferred upon it by these By Laws, the Board of Directors may exercise all such powers of the corporation and do all such lawful acts and things as are authorized by law, by the Articles of Incorporation, or by these By-Laws directed or required to be exercised.

**Section 2. Qualifications**

Members of the Board of Directors shall be chosen from persons who have shown an interest and willingness to participate in the work carried on by the **FCCC**, and been elected as described in these By-Laws.





### **Section 3. Numbers of Directors**

The Board of Directors shall consist of no fewer than eight (8) members, nor more than twenty (20) members.

### **Section 4. Elections**

The elections shall be held at the annual meeting or at a regular meeting of the Board of Directors for this purpose. Each member of the FCCC Board of Directors shall cast a vote for as many candidates as there are positions open on the Board of Directors. All elections shall be by a majority vote of a quorum.

### **Section 5. Term of Office**

Each director shall serve for a term of three (3) years. The rotation of terms, as best as possible, should allow approximately one-third (1/3) of directors to be elected each year to fill vacancies, occurring through the normal expiration of terms. Except as provided, no director shall serve more than two consecutive terms without an intervening period of one (1) year. Any unexpired vacancy filled shall not count as a full term as it pertains to two allowable terms.

### **Section 6. Vacancy**

Any vacancy on the Board of Directors may be filled as provided in Section 4 of these By-Laws.

### **Section 7. Termination**

By a majority vote of the Board, any director's service may be terminated, if the Board in its judgment, determines that it would be in the best interest of the FCCC.

### **Section 8. Honorary**

The Board of Directors may honor one or more of their members from time to time, for long and faithful service by electing him/her an Honorary Board Member for life. An Honorary Board Member may attend all meetings and participate in the discussion, but shall not vote or hold office.

### **Section 9. Recruitment**

Board Members shall be recruited from nominations made by FCCC Board of Directors, Program Staff, or the Juvenile Court Judges. Interested candidates shall submit a brief resume or short biography.

### **Section 10. Resignation**

Members who wish to resign from the FCCC should give written notification to the Chairperson.

## **ARTICLE IV – MEETINGS**

### **Section 1. Annual and Regular Meetings**

The annual meeting of the Board of Directors shall be held during the month of June, at a time and place designated by the Chairperson. The purpose of this meeting shall be to review the work of the organization, to develop fellowship among members, and to develop their united action in planning and carrying forward the program of the organization. The Board of Directors shall meet not less than four (4) times per year, and may schedule other meetings to occur at regular intervals throughout the year.

### **Section 2. Special Meetings**

Special meetings of the Board of Directors shall be held at such time and place as shall be designated in the notice of such meetings, and may be called by the Chairperson at any time, and shall be called by the Chair at the request of any two Directors.

### **Section 3. Notice**

Unless waived as provided by law, the Chairperson or Secretary of the corporation thereof shall give notice to each Director for each meeting stating the time, place and purpose of the meeting.

### **Section 4. Quorum**

A majority of the Directors present shall constitute a quorum for the transaction of any business by the Board of Directors. The vote of a majority of Directors present at a meeting shall be necessary to transact any business, except as otherwise provided by law, the Articles of Incorporation, or by these By-Laws.

### **Section 5. Removal of Director and Inactive Status**

Any member of the Board of Directors who misses three (3) consecutive meetings is/may be subject to removal or placement on an inactive status by vote of the Board of Directors at the next scheduled meeting.

### **Section 6. Informal Action**

Any action that may be taken at a meeting of the Board of Directors may be taken without a meeting if written, faxed, or e-mail consent setting forth the action is signed by

two-thirds of the Directors and filed with the Secretary. Such consent shall have the same effect as a unanimous vote at a meeting of the Board of Directors.

## **ARTICLE V – OFFICERS**

### **Section 1. Election and Term of Office**

The Board of Directors shall elect officers at its annual meeting. There shall be a Chairperson, Vice Chairperson, Secretary and Treasurer. The officers shall be chosen from the membership of the Board. Term of office shall be three (3) years, with the number of terms to be fixed by the Board. Terms of office shall be rotated, as best as possible, so there are not all new officers in any one (1) year.

### **Section 2. Salaries**

The officers of the corporation shall serve in a voluntary capacity.

### **Section 3. Removal of Officers**

Each officer of the corporation shall hold office until such officer's successor is chosen or until such officer's earlier resignation, death or removal. Any officer may be removed by a majority vote of a quorum of members of the Board of Directors whenever, in its judgment, the best interests of the corporation will be served thereby.

### **Section 4. Chairperson**

The Chairperson of the Board of Directors shall be the chief executive officer of the Board. The Chairperson shall call meetings of the Board of Directors to order and shall act as Chair of such meetings, appoint committees, serve as an ex-officio member of all committees and shall be duly authorized to execute contracts on behalf of the corporation.

### **Section 5. Vice Chairman**

The Vice Chair shall perform such duties as are generally performed by vice chairpersons. The Vice Chair shall perform such other duties and exercise such other powers as the Board of Directors shall request or delegate. In the absence of the Chair, or in the event of the death or disability of the Chair, or when specifically authorized by the Board of Directors, the Vice Chair shall perform duties of the Chair, and when so acting shall have the powers of, and be subject to, all restrictions upon the chair.

### **Section 6. Secretary**

The Secretary, or one appointed in her/his absence, shall attend all sessions of the Board of Directors and record all votes and the minutes of all proceedings in books to be kept for that purpose. The Secretary shall have charge of the Seal of the Corporation,

shall give or cause to be given, any notice required to be given of any meetings of the Board of Directors and shall perform such other duties and have such other powers as may be prescribed by the Chair of the Board of Directors.

#### **Section 7. Treasurer**

The Treasurer shall be responsible for all funds, securities, receipts and disbursements of the corporation and shall deposit, or cause to be deposited in the name of the corporation, all moneys or other valuable effects, in such banks, trust companies or other depositories as shall, from time to time be selected by the Board of Directors, shall render to the Chair and to the Board of Directors, at every Board meeting, an accounting of the financial condition of the corporation. In general, the Treasurer shall perform all the duties incident to the office of the Treasurer of a corporation, and such other duties as may be assigned by the Board of Directors or the Chair.

#### **Section 8. Absence.**

In the case of absence of any officer of the corporation, or for any other reason that the Board of Directors may deem sufficient, the Board of Directors may delegate, for the time being, any or all of the powers or duties of such officer to any officer or director.

#### **Section 9. Books and Records**

Each officer shall, upon leaving office, deliver to their successor any books, records or other documents pertaining to the office.

### **ARTICLE VI – COMMITTEES**

#### **Section 1. Committees**

There may be standing committees for Finance, Nominating, Fundraising and Public Relations and such other committees as may be needed by the Board. The Board shall have the power to set committees, define committee responsibilities and to develop written job descriptions for same as needed. The committee chairs shall be appointed by the Chairperson for a term not to exceed one (1) year. Chairs may be reappointed for additional terms. Each committee chair shall present a report to the Board of Directors at each board meeting.

### **ARTICLE VII – SPECIAL CORPORATE ACTS**

#### **Section 1. Execution of Instruments**

Contracts, documents and instruments shall unless otherwise directed by the Board of Directors, be signed in the name, and on behalf of the corporation by the

Chairperson, and the Seal of the Corporation shall be affixed thereto, and attested to by the Secretary, unless otherwise provided by the corporate resolution.

## **Section 2. Checks**

Checks, drafts and other demands for money shall be signed by the Chairperson, or Treasurer. Additionally, other officers, from time to time, may be designated by the Board of Directors. The Chairperson and the Treasurer can sign checks for under \$500. Two signatures are required for checks in excess of \$500.

## **ARTICLE VIII – MISCELLANEOUS**

### **Section 1. Fiscal Year**

The corporation fiscal year shall begin July 1 and end on June 30.

### **Section 2. Seal**

The seal of the Corporation shall be in such form as the Board of Directors may, from time to time, determine. In the event it is inconvenient to use such a seal at any time, the signature of the Corporation, followed by "Seal" enclosed in parenthesis or scroll, shall be deemed the Seal of the Corporation. The seal shall be kept and affixed by the Secretary on such papers as may be directed by law, these By-Laws, or the Board of Directors.

### **Section 3. Appointment of Agents.**

The Chair or Vice Chair shall be authorized and empowered in the name and as an act and deed of the corporation to name and appoint general and special agents, representative and attorneys to represent the corporation, and to prescribe, limit and define the powers and duties of such agents, representatives, attorneys and proxies; and to make substitution, revocation or cancellation in whole or in part, of any power or authority conferred on any such agent, representative, or proxy.

## **ARTICLE IX – DISSOLUTION**

### **Section 1. Dissolution**

Upon the dissolution of this Corporation, no officer, Board member, or anyone else associated with this Corporation shall have any rights nor shall receive any assets of this Corporation. The assets of the corporation are permanently dedicated to a tax exempt organization of the purposes set forth herein.

**ARTICLE X – ADOPTION AND EFFECTIVE DATE**

**Section 1. Adoption and Effective Date**

These By-Laws, are adopted and become effective October 13, 2003.

**ARTICLE XI – AMENDMENTS**

**Section 1. Amendments.**

The By-Laws of the corporation may be altered or amended and new by-laws adopted by the Board of Directors by an affirmative majority vote of a quorum of directors at any regular or special meeting of the Board of Directors, provided that written notice of the changes to be acted upon is given ten (10) days prior to the meeting at which the vote is to be taken.

**ARTICLE XII – RULES OF ORDER**

**Section 1. Rules of Order**

Robert's Rules of Order, Newly Revised, shall govern the proceedings of the FCCC except where the rules conflict with provisions of these By-Laws.

**DATED** this 13th day of October, 2003.

  
\_\_\_\_\_

## OFFICE OF THE DISTRICT ATTORNEY CLAYTON JUDICIAL CIRCUIT

### Investigative Summary

D.A. 13-06-008

On Friday, February 13, 2015, I meet with SABRIN CRAWFORD at her place of employment, Heritage Cadillac in Morrow, Georgia. She submitted to me a typed letter, detailing her involvement as the Chairperson on the CASA Board.

The letter briefly detailed a meeting between CRAWFORD, COLIN SLAY and JUDGE TESKE, where upon the allegations that BOSTOCK had taken between \$14,000-\$17,000 in GAL funds were discussed. It briefly detailed a called CASA board meeting, by JUDGE TESKE in order to brief the board about the employment status of BOSTOCK. CRAWFORD also mentioned in the letter the reason for her resignation.

During our discussion, CRAWFORD felt that BOSTOCK did not commit any criminal act(s) regarding the spending of GAL monies, and added that her only suggestion to BOSTOCK was that he should have received prior approval to all spending of GAL monies.

(Letter attached.)

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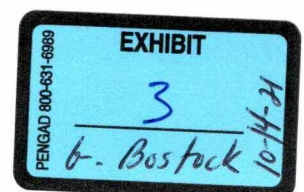
Sabrina Crawford

Heritage Cadillac

7134 Jonesboro Road

Morrow, Ga 30260

770-884-6690



RE: 03-06-008  
Page 2 of 2

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Prepared by:

Allen L. Crenshaw

Deputy Chief Investigator



February 11, 2015

Re: Friends of Clayton County CASA

I was recruited approximately in 2005 by Monique Henderson to be a sponsor for the Clayton County CASA duck derby. From there, I became a volunteer and board member. During those years as board member, I was in attendance at many board meetings and functions. Board/committee meetings were held every other month, monthly and weekly. Monthly and weekly meetings were needed to prepare for the annual Duck Derby. During the official board meetings we discussed fund raising, potential board members, and advocating for CASA. Some items were discussion items and some required approval from the board. There was time allotted for Director discussion regarding any pertinent information that may be valuable to the board regarding staff or volunteers. Statistical data was shared with the board regarding caseloads. The board was made aware if there were any functions or pertinent information in relation to Georgia CASA. During those meetings, Gerald would share information regarding opportunities for additional sponsors or support for the FCCC board. On more than one occasion, he made the board aware that he had met with representatives of companies that may be interested in CASA/Friends of Clayton County CASA and their efforts to fund raise and provide awareness about CASA. I do not remember all, but believe that AT&T, Atlanta Motor Speedway and players from his softball team were among the organizations and people that Gerald was making contact with regarding CASA. Gerald made the board aware that he was going to sponsor his softball team. In return, the players, at least some, were willing to assist with ticket sales and or sponsorships. He said that CASA would be printed on the back of the shirts. He stated that the sponsorship was being paid with GAL funds. The board did not have to vote for this action. It was not FCCC board money.

During our annual fund raising events, we secured two recurring sponsors. Carrabbas and Chili's. Their sponsorship included complimentary food. Staff, volunteers, board members and sponsors were notified they would be responsible for their own alcohol. There were many occasions that did not happen. The board or GAL money would have to pay for a persons tab that was left unpaid. Colin Slay, John Johnson and Judge Teske were aware and approved for it to be paid out of the funds. I recall seeing Judge Teske drinking alcohol at the functions, but can not recall if Colin or John had alcohol.

I remained on the board from 2005 to 2013. Most of that time as the chairperson. I received a call, on a Friday I believe, requesting a meeting with Judge Teske sometime the earlier part of 2013. The meeting was requested to be held at my office at Heritage Cadillac. I met with Colin Slay and Judge Teske. Judge Teske let me know that I may be contacted by the media. The media had or would be interviewing Judge Teske and there could be a possibility that I may receive that same request. That did not happen. Judge Teske informed me that Gerald would be terminated that following Monday. He stated that Gerald had taken money from the GAL funds. The amount was somewhere around \$14,000-\$17,000. I asked was he sure? He stated yes, they had proof. I asked that CASA not be mentioned/portrayed as being involved due to the fact that GAL funds were not monitored by Friends of Clayton County CASA board. He said no. I asked could the interview not be aired due to the negativity and consequences for the CASA organization. He said no. I asked could Gerald be reprimanded instead of terminated until the theft was proven. He said no and slammed his hand down on my desk and said that the "monies were

spent at a gay bar". He stated that locks were being changed and Gerald would be terminated that Monday. He and Colin left my office and stated they would be back in contact with me. Although, I was not asked, I did not contact Gerald to let him know what was going on. That Monday or Tuesday, Gerald came by the dealership and asked had I heard what happened. I said yes. He said he was in shock. He asked me if I thought he had stolen the money. I said no. I told him that the only recommendation I would have made would have been that he get prior approval. He stated that he abided by the Memorandum of Understanding. He stated that his supervisors were aware of how the funds were being spent. He stated that bank statements including written explanations were given to John Johnson. I was also told by Raquel that she had given banks statements to John with explanation of the expenditures written on the statement. I obtained copies of the bank statements which I reviewed. The expenses did not reveal the amount of dining or entertainment that Judge Teske had revealed on the news media.


Within a few days, I was told that Judge Teske has issued a request to all board members for a meeting. I asked that the meeting be rescheduled. I was unable to attend. I received a call from Debbie Stinson regarding the meeting. Judge Teske was present during that call. I was on speaker speaking with Debbie. Judge Teske seemed upset that I had questioned why he was calling a meeting. Meetings with the board are to be requested by the board chair or co-chair. He was neither. The conversation got a little out of hand and Debbie did step in and calmed the situation down. During that call while on speaker in front of his staff, Judge Teske let me know that there would be a federal investigation. He let me know that I would be part of that investigation. He proceeded to tell me that "I need to understand that I am either with him or against him". He stated that "it would not be in my best interest to be against him". He stated "I am CASA". "I started CASA". "I say who, when and where regarding CASA". He again advised me that I needed to be with him. That money was taken and I was the board chair. I reminded him that neither I nor the board had any control of GAL monies. That was his and his staff's responsibility. I reminded him that I did not work for him and he does not have the right to talk to me that way. I told him that what he said was a threat and I did not appreciate that.

The board meeting did take place. Most board members were in attendance along with some staff including John Johnson, Judge Teske and Carol Gossett. The atmosphere was pleasant. Judge Teske did explain to the board the reason for Gerald's termination. Judge Teske asked that the board consider holding a position open for himself or someone from his staff. It was approved by the board. After the meeting, I was talking one on one with John Johnson. He told me that he knew Gerald had been doing this for three years or so. I asked then why didn't you stop it if you knew about it. He just shrugged his shoulder without offering an answer.

I resigned shortly afterwards. Due to my busy schedule, the fact that I felt it would take me actually resigning to get someone to step forward to take the board position, the manner of which I was spoken to by Judge Teske, the fact that I had people telling me that Judge Teske had been talking negatively about the dealership and myself, telling people he was going to have us investigated by the IRS for the Mitsubishi that was used as first place prize at the duck derby, the fact that I believe Judge Teske allowed CASA to be positioned negatively in the media for his personal gain, the fact that I believe Judge Teske did not have enough facts before he portrayed Gerald and the CASA organization in the media. I

did not feel that it was in my best interest to continue my efforts promoting and advocating for a cause that someone could so carelessly tear down. The side of Judge Teske that I saw during this situation was not one that I was willing to work alongside with. His portrayed himself as God like. I did not agree with his actions. I believe it was a witch hunt. There was anger in him when he slammed his hand down on my desk and said but "it was at a gay bar". Therefore, for all the reasons I just stated, it was best for me to move on.

Sabrina Crawford

A handwritten signature in cursive script that reads "Sabrina Crawford". The signature is written in black ink and is positioned to the right of the printed name "Sabrina Crawford".

Memorandum of Understanding

Between

Superior Court of the State of Georgia for the County of Clayton

And

Clayton County CASA

MISSION STATEMENT

The Clayton County CASA program provides advocacy and intervention to abused and neglected children in foster care and relative care custody, as well as, Guardian Ad Litem services to children involved in custody disputes through commitment to the following program values:

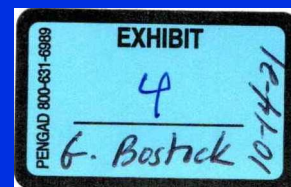
- Competent professional staff
- Supportive environment for recruitment, training and retention of volunteers
- Opportunities for volunteers to form caring, committed, relationships with children and their families
- Provision of concise meaningful reports containing thoughtful well-reasoned recommendations that assist the Court in meeting the needs of the child

THE GOAL OF CLAYTON COUNTY CASA

To be an effective response to a growing need for children to have a voice in deprivation and custody dispute proceedings by recruiting, training and supporting CASA volunteers who advocate for the best interest of the child.

The Clayton County CASA program is organized as a division of the Clayton County Juvenile Court and is given authority to recruit, train, support, and supervise CASA volunteers who serve as advocates for children under both a Clayton County Superior Court Order and a Clayton County Juvenile Court Order.

Achieving the goal of the CASA/Guardian Ad Litem service to children involved in



**Section I. Cases to be Referred to a CASA Program**

Custody dispute cases under the jurisdiction of the Clayton County Superior Court where the judge requests CASA involvement are proper for referral to the Clayton County CASA program.

**Section II. Administrative Fee**

Clayton County CASA will charge a flat \$500 administrative fee. All monies must be received by CASA prior to commencement of investigation by CASA. If the \$500 administrative is not paid the CASA investigation will not commence until the administrative fee is received.

Order for payment of costs of Guardian Ad Litem services will be sent to the respective parties by the Clayton County Superior Court and shall include the following statement: "Cash and money order are acceptable means of payment. No personal checks will be accepted; however, a check drawn on the respective attorney's firm will be accepted for payment. All fees shall be paid to Friends of Clayton County CASA, Inc., Care of Gerald Bostock, Program Coordinator of CASA; Clayton County Juvenile Court; 121 S. McDonough St. Courthouse Annex 3; Jonesboro, GA. 30236."

The Clayton County CASA Advisory Board is the recipient of the administrative fee and will use the fees to fund volunteer recruitment, training, and retention.

**Section III. Role and Responsibility of a CASA Volunteer**

The roles and responsibilities of the CASA/Guardian Ad Litem (GAL) are as follows:

- A. The CASA/GAL's Role: The CASA/GAL is a volunteer of at least 21 years of age from the local community who has been screened and completed the 40 hour state-certified CASA training program, as well as, has received 8 hours of investigative training related to Superior Court custody cases. A CASA/GAL is appointed by the judge as an officer of the Court to advocate for children who are involved in custody dispute proceedings. The role of the CASA/GAL is to provide the Superior Court with independent and objective information regarding the status of children involved in custody dispute matters. Upon appointment, the CASA/GAL independently gathers and evaluates information which the judge will take into consideration in making a decision to protect the best interests of the child.
- B. The CASA/GAL responsibilities under the Court include:
  - Independently gathers pertinent information to determine what is in the best interest of the child/children involved in the custody dispute; by reviewing all relevant records and interviewing interested parties to ascertain the facts and circumstances as related to the present case.
  - Develops and submits written and verbal reports to the Court and to the respective attorneys for review
  - Reports to and is supervised by Clayton County CASA Special Assistant for Judicial Investigations

C. A CASA/GAL MAY NOT:

- Become inappropriately involved in a case by engaging in activities which endangers the wellbeing of the child, the integrity of the program, or the objectivity of the volunteer
- Be involved in activities that are likely to result in a conflict of interest
- Give legal advice
- Provide therapeutic counseling
- Make placement arrangements for a child
- Be related to any parties involved in the case

**Section IV. Implementation of Volunteer Activities**

A. **Appointment:** Appointment of a CASA/GAL will begin with an Order of Appointment from Superior Court and will remain in effect until the CASA/GAL's service is terminated.

B. **Assignment:**

1. Once a determination is made that a Superior Court case requires a CASA/GAL, the following is requested:
  - a) A copy of the initiating complaint and any other pertinent information shall be forwarded to the Special Assistant in order to determine the CASA/GAL who will be assigned to the case for investigation
2. The Special Assistant or his/her designee assigns an available CASA/GAL as soon as possible
3. After assignment of the CASA/GAL is determined, the name will be forwarded to the Superior Court and an Order of Appointment will be processed
4. After the judge signs the CASA Appointment Court Order, the Order is returned to the Special Assistant or his/her designee at Clayton County Juvenile Court (121 S. McDonough St. Courthouse Annex 3, Jonesboro, GA. 30236)
5. The Special Assistant receives the Appointment Order and notifies the assigned CASA/GAL of appointment
6. The CASA/GAL receives the certified copy of the Appointment Order and should be prepared to review all pertinent records and/or documents once the administrative fee has been received from each party
7. The Special Assistant will forward a letter to the attorneys, of each party, requesting:
  - a) A list of witnesses that will be interviewed on their client's behalf (the list of witnesses shall be limited to ten names). This list shall include the names; addresses and telephone numbers of the witnesses
  - b) An appointment will be scheduled with the attorney and his/her client to be conducted at the Clayton County Juvenile Court and fees may be submitted for services at this time

8. Through the CASA/GAL Order of Appointment, The CASA/GAL becomes a party to the case
9. This assignment process may be revised and updated as necessary to meet the needs of the Superior Court and the Clayton County CASA program

**C. Procedure of Information Gathering:** Once the CASA/GAL has been assigned, the Special Assistant will review the case file and will discuss with the CASA/GAL his/her duties in the case. The CASA/GAL shall conduct an independent and objective investigation in order to gather pertinent factual information to present to the judge to determine the best interest for the child/children. The investigation shall include interviews with and observations of the child, interviews with other individuals that may help in determining what is in the child's best interest, and a review of the relevant records and reports of the case.

The duties the CASA/GAL will perform include:

**Interviews:**

1. The CASA/GAL or Special Assistant will obtain a copy of all petitions filed within the Superior Court by the respective parties and any interlocutory or other orders (TPO or other restraining orders) issued in the case. These documents will be maintained by the Clerk of the Superior Court. In the event of a modification of a divorce decree, a copy of the divorce order, agreement and any other documents pertinent to the case should be retrieved and made a part of the CASA/GAL's findings.
2. The CASA/GAL will begin the investigation by scheduling appointments via telephone or letter with the plaintiff and the defendant in the case. This interview is conducted primarily to obtain the plaintiff's and defendant's perspective (as a point of reference, these interviews are independent of one another). During this interview, the investigator will have each party sign Releases of Information in order to check criminal backgrounds, mental health records, school records and medical records for all parties including children.
3. The CASA/GAL shall obtain background information on the plaintiff and the defendant. This information should include the parties' dates of birth, social security numbers, marital status, number of marriages, dates of marriages and or divorces, number of children, employment information, monthly income and expenses, and criminal history.
4. The CASA/GAL shall interview all witnesses provided by the plaintiff and the defendant, as well as, attempt to locate additional witnesses (i.e., neighbors, employers, and any other persons that could offer information that would be helpful to the CASA/GAL in deciding what is in the best interest of the child/children). The first interview of a witness should be done in person.
5. The CASA/GAL shall not involve the child/children anymore than necessary. The CASA/GAL should not question a child/children unless they appear to be mature and/or old enough.

6. Home visits will be made to the plaintiff's and the defendant's residence. If circumstances allow, an evaluation of the home should include at least one unannounced visit.
7. The CASA/GAL will conduct a second interview with the plaintiff and the defendant at the unannounced home visit to clarify or verify inconsistencies and conflicting information that has been found during interviews with witnesses.

**Reporting:**

Written Reports: Written reports are required for all investigations. The CASA/GAL will prepare written reports under the supervision of the Special Assistant in a format and manner approved by the CASA program. Written reports are to be submitted to the Clayton County Superior Court Judge and to each attorney representing a party to the case in accordance with the Court rules prior to any hearing.

Written reports shall include information in the following areas:

- *Background Information:* information will detail the reason for the investigation (i.e. information pertaining to determining the most suitable custodial parent or a modification of the divorce decree).
- *Biographical Data:* information will include data on the plaintiff and the defendant (i.e., Date of Birth, Social Security Number, marriages, divorces, employment history, etc).
- *Financial Information:* information will include monthly income and monthly expenditures.
- *Findings:* information will reflect the witnesses' statements and other applicable information.
- *Comments and Recommendations:* the comments and recommendations section will reflect the investigator's depiction of the factual information, as well as, concerns received during the investigative process. In writing the findings and the recommendations, the CASA/GAL should be aware of the legal standards for determining the custody of the child/children. The legal standard is the "best interest" of the child/children.
- Attachments should be used whenever practical. For example, details of a lengthy police report should be paraphrased with reference to an attachment that contains the actual police report. All attachments should be tabbed at the end of the investigative report.
- All investigative reports shall be typed and submitted to the Special Assistant for review before being dispersed to the Superior Court and the respective attorneys.

Verbal Reports: The CASA/GAL shall also provide verbal reports on his/her findings when requested by the judge.



Mandatory Reporting: Clayton County CASA/GALs are mandated reporters. The CASA/GAL has a mandatory obligation to immediately report any suspicion of child abuse or neglect to the Department of Family and Children Services.

Testimony: The CASA/GAL may be called as a witness in an action by the Court or by a party to the case and address questions concerning the investigative report.

Access to Information: The Special Assistant shall assist the CASA/GAL in obtaining criminal record checks on all parties to the case. By order of the Superior Court, the CASA/GAL has the authority to obtain pertinent information related to the assigned case. To include but not limited to information and documentation from respective parties and attorneys.

- D. **Resignation:** When a CASA/GAL finds it necessary to resign from a case, he/she shall take the following actions:
- a) He/she should immediately notify the Special Assistant
  - b) The CASA/GAL shall provide a written resignation to facilitate the Court Appointment of a new CASA/GAL to the case
  - c) Upon a CASA/GAL's resignation all case files and court related materials shall be returned to the CASA Program offices

The Special Assistant will be responsible for removing the out-going CASA/GAL from the court order and seeking a replacement if needed. The Special Assistant will follow the appointment and assignment process (discussed above) in the event that a new CASA/GAL is needed for the case.

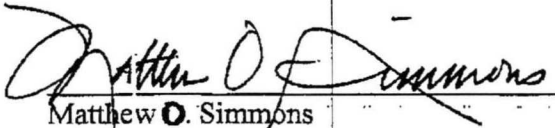
- E. **Termination Policy:** A CASA/GAL who does not adhere to the rules and procedure of the CASA program or who fails to perform his/her CASA/GAL assignments satisfactorily is subject to dismissal. A CASA/GAL may be terminated for taking action which:
- Could endanger the child or parties to a case
  - Is not within the scope of duties and responsibilities of a CASA/GAL
  - Violates approved guidelines or Clayton County Superior Court procedure and law
  - Breaches confidentiality
  - Could adversely affect the confidence of the public in the integrity of the program
  - Is considered gross misconduct or insubordination
  - Is performed, while acting as a CASA/GAL under the influence of alcohol or drugs
  - Includes theft of property or misuse of program equipment or materials

**Section V. Working Relationships**

- A. The Special Assistant will supervise the CASA/GAL and facilitate the interaction of the CASA/GAL with the Superior Court and other named parties involved in the case.
- B. The CASA/GAL will maintain and keep up to date notes for each assigned case and will seek guidance and assistance from the Special Assistant in the performance of CASA duties.
- C. The Clayton County Superior Court and the Special Assistant shall communicate on an as-needed basis to facilitate an effective operation of the Clayton County CASA custody dispute GAL service. There can be no ex parte communication.
- D. A Clayton County CASA staff member shall accompany the CASA volunteer in Court proceedings and settlement conferences.
- E. Clayton County CASA and the Clayton County Superior Court will maintain communication regarding the management, implementation, and operation of the CASA/GAL custody dispute service, as well as, provide information on CASA volunteer performance.
- F. The CASA/GAL caseload may vary depending on volunteer availability. Clayton County Superior Court and Clayton County CASA should correspond with one another regarding the number of available volunteers and the number of cases the CASA/GAL service is able to accept.

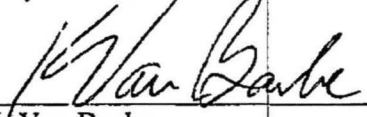
**Section VI. Acceptance**

This Memorandum of Understanding has been reviewed and accepted by the management of governing bodies of the organizations indicated below.



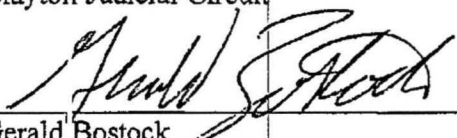
Date: 11-20-07

Matthew O. Simmons  
Chief Judge  
Superior Court  
Clayton Judicial Circuit



Date: 12/17/07

K. Van Banke  
Chief Judge  
Juvenile Court  
Clayton Judicial Circuit



Date: 12/13/07

Gerald Bostock  
CASA Program Coordinator  
Juvenile Court of Clayton County



P.O. BOX 935 101 NORTH MAIN STREET  
 JONESBORO, GEORGIA 30237-0935  
 (770) 478-8881

ACCOUNT: ██████████ 1812  
 DOCUMENTS: 0

PAGE: 1  
 01/05/2011

FRIENDS OF CLAYTON COUNTY  
 CASA INC  
 DBA GUARDIAN AD LITEM ACCOUNT  
 124 NORTH MCDONOUGH ST STE 101  
 JONESBORO GA 30236

COMMUNITY CHECKING ACCOUNT ██████████ 1812

|                       |          |                         |          |
|-----------------------|----------|-------------------------|----------|
| MINIMUM BALANCE       | 1,246.35 | LAST STATEMENT 12/01/10 | 1,941.73 |
| AVG AVAILABLE BALANCE | 1,525.13 | CREDITS                 | .00      |
| AVERAGE BALANCE       | 1,525.13 | 6 DEBITS                | 695.38   |
|                       |          | THIS STATEMENT 01/05/11 | 1,246.35 |

| DESCRIPTION  | DATE  | AMOUNT |
|--|-------|--------|
| VZ WIRELESS VE E CHECK 3733068   | 12/06 | 243.21 |
| POS 12/08/10 09:27 3571 GINA'S BISTRO & GINA'S BIS JONESBORO GA 100003 | 12/08 | 10.68  |
| POS 12/10/10 09:47 3571 RUBY TUESDAY #5 RUBY TUESD HAMPTON GA 556168   | 12/10 | 190.78 |
| POS 12/16/10 09:42 3571 GINA'S BISTRO & GINA'S BIS JONESBORO GA 100003 | 12/16 | 21.90  |
| POS 12/23/10 04:19 3571 MARLOWS TAVERN MARLOWS TA ATLANTA GA 004893    | 12/23 | 68.60  |
| VZ WIRELESS VE E CHECK 7352103   | 01/05 | 160.21 |

--- ITEMIZATION OF OVERDRAFT AND RETURNED ITEM FEES ---

|                             |             |              |            |
|-----------------------------|-------------|--------------|------------|
| *****                       |             |              |            |
| *                           | TOTAL FOR   | TOTAL        | PREVIOUS   |
| *                           | THIS PERIOD | YEAR TO DATE | YEAR TOTAL |
| *****                       |             |              |            |
| * TOTAL OVERDRAFT FEES:     | .00         | .00          | .00        |
| *****                       |             |              |            |
| * TOTAL RETURNED ITEM FEES: | .00         | .00          | .00        |
| *****                       |             |              |            |

| DAILY BALANCE |          | DAILY BALANCE |          | DAILY BALANCE |          |
|---------------|----------|---------------|----------|---------------|----------|
| DATE          | BALANCE  | DATE          | BALANCE  | DATE          | BALANCE  |
| 12/06         | 1,698.52 | 12/08         | 1,687.84 | 12/10         | 1,497.06 |

\* \* \* CONTINUED \* \* \*



Member FDIC

Equal Housing Lender

HERITAGE 24 (404)897-5447

www.heritagebank.com



P.O BOX 935 101 NORTH MAIN STREET  
JONESBORO, GEORGIA 30237-0935  
(770) 478-8881

ACCOUNT:  
DOCUMENTS:

1812  
0

PAGE: 2  
01/05/2011

FRIENDS OF CLAYTON COUNTY  
CASA INC  
DBA GUARDIAN AD LITEM ACCOUNT

COMMUNITY CHECKING ACCOUNT 1812

| DAILY BALANCE |          |       |          |       |          |
|---------------|----------|-------|----------|-------|----------|
| DATE          | BALANCE  | DATE  | BALANCE  | DATE  | BALANCE  |
| 12/16         | 1,475.16 | 12/23 | 1,406.56 | 01/05 | 1,246.35 |

Member FDIC

Equal Housing Lender

HERITAGE 24 (404)897-5447

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P.O. BOX 935 • 101 NORTH MAIN STREET  
 JONESBORO, GEORGIA 30237-0935  
 (770) 478-8881

ACCOUNT: [REDACTED] 1812  
 DOCUMENTS: 0

PAGE: 1  
 02/02/2011

000085

FRIENDS OF CLAYTON COUNTY  
 CASA INC  
 DBA GUARDIAN AD LITEM ACCOUNT  
 124 NORTH MCDONOUGH ST STE 101  
 JONESBORO GA 30236

=====

COMMUNITY CHECKING ACCOUNT [REDACTED] 1812

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|                       |          |                         |          |
|-----------------------|----------|-------------------------|----------|
| MINIMUM BALANCE       | 838.01   | LAST STATEMENT 01/05/11 | 1,246.35 |
| AVG AVAILABLE BALANCE | 1,081.47 | CREDITS                 | .00      |
| AVERAGE BALANCE       | 1,081.47 | 4 DEBITS                | 408.34   |
|                       |          | THIS STATEMENT 02/02/11 | 838.01   |

- - - - - OTHER DEBITS - - - - -

| DESCRIPTION   | DATE  | AMOUNT |
|---|-------|--------|
| POS 01/07/11 08:13 3571 MAGUIRE'S OLDE MAGUIRE'S MORROW GA 103023   | 01/07 | 26.20  |
| POS 01/20/11 00:28 3571 CHILI'S GRI4760CHILI'S GR Morrow GA 426630  | 01/20 | 37.04  |
| POS 01/22/11 17:56 3571 KIN*NATIONAL CAKIN*NATION 866-992-3374 CA 000455 <i>CC payment to non profit organization</i> | 01/24 | 330.00 |
| POS 01/28/11 05:51 3571 IKEA ATLANTA IKEA ATLAN ATLANTA GA 805007   | 01/28 | 15.10  |

- - - ITEMIZATION OF OVERDRAFT AND RETURNED ITEM FEES - - -

| *****                       |                       |                    |
|-----------------------------|-----------------------|--------------------|
|                             | TOTAL FOR THIS PERIOD | TOTAL YEAR TO DATE |
| * TOTAL OVERDRAFT FEES:     | .00                   | .00                |
| * TOTAL RETURNED ITEM FEES: | .00                   | .00                |
| *****                       |                       |                    |

- - - - - DAILY BALANCE - - - - -

| DATE  | BALANCE  | DATE  | BALANCE | DATE | BALANCE |
|-------|----------|-------|---------|------|---------|
| 01/07 | 1,220.15 | 01/24 | 853.11  |      |         |
| 01/20 | 1,183.11 | 01/28 | 838.01  |      |         |

CLAYTON\_014076



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ACCOUNT:  
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 0

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FRIENDS OF CLAYTON COUNTY  
 CASA INC  
 DBA GUARDIAN AD LITEM ACCOUNT  
 124 NORTH MCDONOUGH ST STE 101  
 JONESBORO GA 30236

=====

COMMUNITY CHECKING ACCOUNT 1812

=====

|                       |        |                         |        |
|-----------------------|--------|-------------------------|--------|
|                       |        | LAST STATEMENT 02/02/11 | 838.01 |
| MINIMUM BALANCE       | 335.31 | CREDITS                 | .00    |
| AVG AVAILABLE BALANCE | 524.80 | 6 DEBITS                | 502.70 |
| AVERAGE BALANCE       | 524.80 | THIS STATEMENT 03/02/11 | 335.31 |

----- OTHER DEBITS -----

| DESCRIPTION  | DATE  | AMOUNT |
|--|-------|--------|
| POS 02/03/11 20:30 3571 CARRABBA'S #110CARRABBA'S MORROW GA 02/04<br>581582    |       | 43.17  |
| VZ WIRELESS VE E CHECK 6016921   | 02/09 | 160.21 |
| POS 02/17/11 10:24 3571 FLAVORS OF THAIFLAVORS OF JONESBORO 02/17<br>GA 286724 |       | 35.44  |
| POS 02/16/11 20:03 3571 CHILI'S GRI4760CHILI'S GR Morrow GA 02/17<br>426530    |       | 87.85  |
| POS 02/16/11 20:03 3571 CHILI'S GRI4760CHILI'S GR Morrow GA 02/17<br>426530    |       | 160.17 |
| POS 02/24/11 05:09 3571 DUNKIN #304933 DUNKIN #30 JONESBORO 02/24<br>GA 072002 |       | 15.86  |

--- ITEMIZATION OF OVERDRAFT AND RETURNED ITEM FEES ---

```

*****
*                                     | TOTAL FOR | TOTAL      *
*                                     | THIS PERIOD | YEAR TO DATE *
*-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|
* TOTAL OVERDRAFT FEES:                |           .00 |           .00 *
*-----|-----|-----|-----|-----|-----|-----|-----|-----|
* TOTAL RETURNED ITEM FEES:            |           .00 |           .00 *
*****
    
```

----- DAILY BALANCE -----

|                  |                  |                  |
|------------------|------------------|------------------|
| DATE.....BALANCE | DATE.....BALANCE | DATE.....BALANCE |
| 02/04 794.84     | 02/09 634.63     | 02/17 351.17     |

\* \* \* C O N T I N U E D \* \* \*

CLAYTON\_014075



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ACCOUNT: [REDACTED] 1812  
 DOCUMENTS: 3

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 04/06/2011

000030

FRIENDS OF CLAYTON COUNTY  
 CASA INC  
 DBA GUARDIAN AD LITEM ACCOUNT  
 124 NORTH MCDONOUGH ST STE 101  
 JONESBORO GA 30236

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COMMUNITY CHECKING ACCOUNT [REDACTED] 1812

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|                       |        |                         |          |
|-----------------------|--------|-------------------------|----------|
|                       |        | LAST STATEMENT 03/02/11 | 335.31   |
| MINIMUM BALANCE       | 335.31 | 3 CREDITS               | 1,500.00 |
| AVG AVAILABLE BALANCE | 905.02 | 9 DEBITS                | 596.71   |
| AVERAGE BALANCE       | 919.30 | THIS STATEMENT 04/06/11 | 1,238.60 |

----- DEPOSITS -----

|                           |                           |                           |
|---------------------------|---------------------------|---------------------------|
| REF #.....DATE.....AMOUNT | REF #.....DATE.....AMOUNT | REF #.....DATE.....AMOUNT |
| 03/07 750.00              | 03/17 250.00              | 04/04 500.00              |

----- OTHER DEBITS -----

|   |       |        |
|---|-------|--------|
| DESCRIPTION   | DATE  | AMOUNT |
| VZ WIRELESS VE E CHECK 3621164                                      | 03/07 | 160.21 |
| POS 03/11/11 04:49 3571 ROCKY'S ROCKY'S JONESBORO GA 900016         | 03/11 | 23.49  |
| POS 03/18/11 08:14 3571 RUBY TUESDAY #2RUBY TUESD CONYERS GA 000127 | 03/18 | 22.66  |
| POS 03/21/11 08:58 3571 HOULIHAN'S #522HOULIHAN'S CHICAGO IL 200688 | 03/21 | 21.37  |
| POS 03/21/11 04:22 3571 HYATT HOTELS F&HYATT HOTE CHICAGO IL 072006 | 03/21 | 35.97  |
| POS 03/20/11 16:02 3571 HYATT HOTELS F&HYATT HOTE CHICAGO IL 072006 | 03/21 | 69.32  |
| POS 03/22/11 04:30 3571 HYATT HOTELS F&HYATT HOTE CHICAGO IL 072006 | 03/22 | 26.31  |
| POS 03/26/11 01:00 3571 404.262.7130HOU404.262.71 ATLANTA GA 084237 | 03/28 | 77.17  |
| VZ WIRELESS VE E CHECK 9781434                                      | 04/06 | 160.21 |

*Houston's AtI Restaurant*

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CLAYTON\_014074



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ACCOUNT: ██████████ 1812  
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FRIENDS OF CLAYTON COUNTY  
 CASA INC  
 DBA GUARDIAN AD LITEM ACCOUNT  
 124 NORTH MCDONOUGH ST STE 101  
 JONESBORO GA 30236

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COMMUNITY CHECKING ACCOUNT ██████████ 1812

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|                       |          |                         |          |
|-----------------------|----------|-------------------------|----------|
|                       |          | LAST STATEMENT 04/06/11 | 1,238.60 |
| MINIMUM BALANCE       | 1,167.70 | CREDITS                 | .00      |
| AVG AVAILABLE BALANCE | 1,196.84 | 4 DEBITS                | 70.90    |
| AVERAGE BALANCE       | 1,196.84 | THIS STATEMENT 05/04/11 | 1,167.70 |

----- CHECKS -----

|                          |                          |                          |
|--------------------------|--------------------------|--------------------------|
| CHECK #..DATE.....AMOUNT | CHECK #..DATE.....AMOUNT | CHECK #..DATE.....AMOUNT |
| 1041 04/26 18.66         |                          |                          |

----- OTHER DEBITS -----

|  |       |        |
|--|-------|--------|
| DESCRIPTION  | DATE  | AMOUNT |
| POS 04/08/11 06:11 3571 QT 798 OQT 798 COVINGTON GA 993700         | 04/08 | 2.12   |
| POS 04/09/11 02:26 3571 FIREHOUSE SUBS FIREHOUSE AUGUSTA GA 101008 | 04/11 | 26.58  |
| POS 04/22/11 04:55 3571 TRUETT'S GRILL TRUETT'S G MORROW GA 710035 | 04/22 | 23.54  |

--- ITEMIZATION OF OVERDRAFT AND RETURNED ITEM FEES ---

```

*****
*                               | TOTAL FOR | TOTAL      *
*                               | THIS PERIOD | YEAR TO DATE *
*-----|-----|-----*
* TOTAL OVERDRAFT FEES:      |          .00 |          .00 *
*-----|-----|-----*
* TOTAL RETURNED ITEM FEES:  |          .00 |          .00 *
*****
    
```

----- DAILY BALANCE -----

|                  |                  |                  |
|------------------|------------------|------------------|
| DATE.....BALANCE | DATE.....BALANCE | DATE.....BALANCE |
| 04/08 1,236.48   | 04/22 1,186.36   |                  |
| 04/11 1,209.90   | 04/26 1,167.70   |                  |

CLAYTON\_014072



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ACCOUNT: [REDACTED] 1812  
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000044

FRIENDS OF CLAYTON COUNTY  
 CASA INC  
 DBA GUARDIAN AD LITEM ACCOUNT  
 124 NORTH MCDONOUGH ST STE 101  
 JONESBORO GA 30236

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COMMUNITY CHECKING ACCOUNT [REDACTED] 1812

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|                       |          |                         |          |
|-----------------------|----------|-------------------------|----------|
| MINIMUM BALANCE       | 964.69   | LAST STATEMENT 05/04/11 | 1,167.70 |
| AVG AVAILABLE BALANCE | 1,275.80 | 1 CREDITS               | 500.00   |
| AVERAGE BALANCE       | 1,284.73 | 7 DEBITS                | 385.30   |
|                       |          | THIS STATEMENT 06/01/11 | 1,282.40 |

----- DEPOSITS -----

|                           |                           |                           |
|---------------------------|---------------------------|---------------------------|
| REF #.....DATE.....AMOUNT | REF #.....DATE.....AMOUNT | REF #.....DATE.....AMOUNT |
| 05/11 500.00              |                           |                           |

----- CHECKS -----

|                          |                          |                          |
|--------------------------|--------------------------|--------------------------|
| CHECK #..DATE.....AMOUNT | CHECK #..DATE.....AMOUNT | CHECK #..DATE.....AMOUNT |
| 1042 05/10 42.80         | 1043 05/18 54.99         |                          |

----- OTHER DEBITS -----

|   |       |        |
|---|-------|--------|
| DESCRIPTION   | DATE  | AMOUNT |
| VZ WIRELESS VE E CHECK 5399004  | 05/05 | 160.21 |
| POS 05/18/11 23:12 3571 CACTUS CAR WASHCACTUS CAR ATLANTA GA 158104     | 05/19 | 20.95  |
| POS 05/18/11 19:02 3571 BRASSTOWN VALLEBRASSTOWN YOUNG HARRIS GA 259546 | 05/19 | 41.69  |
| POS 05/19/11 22:36 3571 BRASSTOWN VALLEBRASSTOWN YOUNG HARRIS GA 259547 | 05/20 | 16.38  |
| POS 05/26/11 06:19 3571 MCCORMICK & SCHMCCORMICK ATLANTA GA 541450      | 05/26 | 48.28  |

\* \* \* CONTINUED \* \* \*

*→ took county vehicle (Gold Car)*



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ACCOUNT:  
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FRIENDS OF CLAYTON COUNTY  
 CASA INC  
 DBA GUARDIAN AD LITEM ACCOUNT

=====

COMMUNITY CHECKING ACCOUNT 1812

=====

- - - ITEMIZATION OF OVERDRAFT AND RETURNED ITEM FEES - - -

| ***** |                           |             |              |
|-------|---------------------------|-------------|--------------|
| *     |                           | TOTAL FOR   | TOTAL        |
| *     |                           | THIS PERIOD | YEAR TO DATE |
| ----- |                           |             |              |
| *     | TOTAL OVERDRAFT FEES:     | .00         | .00          |
| *     |                           |             |              |
| *     | TOTAL RETURNED ITEM FEES: | .00         | .00          |
| *     |                           |             |              |
| ***** |                           |             |              |

- - - - - DAILY BALANCE - - - - -

| DATE..... | BALANCE  | DATE..... | BALANCE  | DATE..... | BALANCE  |
|-----------|----------|-----------|----------|-----------|----------|
| 05/05     | 1,007.49 | 05/18     | 1,409.70 | 05/26     | 1,282.40 |
| 05/10     | 964.69   | 05/19     | 1,347.06 |           |          |
| 05/11     | 1,464.69 | 05/20     | 1,330.68 |           |          |



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FRIENDS OF CLAYTON COUNTY  
 CASA INC  
~~DBA GUARDIAN AD LITEM ACCOUNT~~  
 124 NORTH MCDONOUGH ST STE 101  
 JONESBORO GA 30236

=====

COMMUNITY CHECKING ACCOUNT 1812

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|                       |        |                         |          |
|-----------------------|--------|-------------------------|----------|
|                       |        | LAST STATEMENT 06/01/11 | 1,282.40 |
| MINIMUM BALANCE       | 823.43 | 1 CREDITS               | 500.00   |
| AVG AVAILABLE BALANCE | 976.68 | 7 DEBITS                | 641.02   |
| AVERAGE BALANCE       | 990.97 | THIS STATEMENT 07/06/11 | 1,141.38 |

----- DEPOSITS -----

|                           |                           |                           |
|---------------------------|---------------------------|---------------------------|
| REF #.....DATE.....AMOUNT | REF #.....DATE.....AMOUNT | REF #.....DATE.....AMOUNT |
| 06/29 500.00              |                           |                           |

----- OTHER DEBITS -----

| DESCRIPTION   | DATE  | AMOUNT |
|---|-------|--------|
| VZ WIRELESS VE E CHECK 9032499                                    | 06/06 | 160.21 |
| POS 06/08/11 23:25 3571 CHILI'S GRI4760CHILI'S GR Morrow GA 06/09 |       | 57.89  |
| 426630  |       |        |
| POS 06/08/11 23:25 3571 CHILI'S GRI4760CHILI'S GR Morrow GA 06/09 |       | 199.23 |
| 426630  |       |        |
| POS 06/10/11 20:58 3571 CHINA CITY CHINA CITY JONESBORO GA 06/13  |       | 33.42  |
| 124016  |       |        |
| POS 06/18/11 04:12 3571 TOKYO EXPRESS TOKYO EXPR MORROW GA 06/20  |       | 8.22   |
| 013124  |       |        |
| POS 07/01/11 05:06 3571 JONESBORO DWARFJONESBORO JONESBORO 07/01  |       | 20.05  |
| GA 710037   |       |        |
| POS 07/01/11 05:06 3571 JONESBORO DWARFJONESBORO JONESBORO 07/01  |       | 162.00 |
| GA 710037   |       |        |

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 JONESBORO, GEORGIA 30237-0935  
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ACCOUNT: ██████████ 1812  
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*File*

FRIENDS OF CLAYTON COUNTY  
 CASA INC  
 DBA GUARDIAN AD LITEM ACCOUNT  
 124 NORTH MCDONOUGH ST STE 101  
 JONESBORO GA 30236

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COMMUNITY CHECKING ACCOUNT ██████████ 1812

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|                       |          |                         |          |
|-----------------------|----------|-------------------------|----------|
| MINIMUM BALANCE       | 910.32   | LAST STATEMENT 07/06/11 | 1,141.38 |
| AVG AVAILABLE BALANCE | 1,080.59 | 3 CREDITS               | 531.00   |
| AVERAGE BALANCE       | 1,097.48 | 10 DEBITS               | 434.93   |
|                       |          | THIS STATEMENT 08/03/11 | 1,237.45 |

----- DEPOSITS -----

|                           |                           |                           |
|---------------------------|---------------------------|---------------------------|
| REF #.....DATE.....AMOUNT | REF #.....DATE.....AMOUNT | REF #.....DATE.....AMOUNT |
| 07/20 250.00              | 07/28 273.00              |                           |

----- OTHER CREDITS -----

|                         |       |        |
|-------------------------|-------|--------|
| DESCRIPTION             | DATE  | AMOUNT |
| PROOF CORRECTION CREDIT | 07/28 | 8.00   |

----- CHECKS -----

|                          |                          |                          |
|--------------------------|--------------------------|--------------------------|
| CHECK #..DATE.....AMOUNT | CHECK #..DATE.....AMOUNT | CHECK #..DATE.....AMOUNT |
| 1045 07/19 25.39         | 1046 07/21 30.00         |                          |

*Reimbursement requested 5/17*

----- OTHER DEBITS -----

|   |       |        |
|---|-------|--------|
| DESCRIPTION   | DATE  | AMOUNT |
| POS 07/07/11 06:13 3571 PUBLIX #461 PUBLIX #46 MORROW GA 600127         | 07/07 | 9.03   |
| POS 07/09/11 18:33 3571 DOLLAR-GENERAL DOLLAR-GEN JONESBORO GA 100166   | 07/11 | 3.21   |
| POS 07/10/11 11:48 3571 FOOD LION #2165FOOD LION JONESBORO GA 720014    | 07/11 | 6.16   |
| POS 07/09/11 07:04 3571 LEE'S GOLDEN BULEE'S GOLD MORROW GA 577248      | 07/11 | 22.15  |
| VZ WIRELESS VE E CHECK 3793153  | 07/11 | 160.21 |
| POS 07/12/11 16:01 3571 QUIZNOS SUB #54QUIZNOS SU STOCKBRIDGE GA 249415 | 07/12 | 4.91   |
| POS 07/21/11 15:51 3571 ZAXBY'S #38701 ZAXBY'S #3 RIVERDALE GA 118249   | 07/21 | 13.66  |
| VZ WIRELESS VE E CHECK 2307878  | 07/29 | 160.21 |

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CLAYTON\_014054

**Heritage**  
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JONESBORO, GEORGIA 30237-0935  
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ACCOUNT:  
DOCUMENTS:

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FRIENDS OF CLAYTON COUNTY  
CASA INC  
DBA GUARDIAN AD LITEM ACCOUNT  
124 NORTH MCDONOUGH ST STE 101  
JONESBORO GA 30236

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COMMUNITY CHECKING ACCOUNT 1812

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|                       |        |                         |          |
|-----------------------|--------|-------------------------|----------|
| MINIMUM BALANCE       | 265.91 | LAST STATEMENT 08/03/11 | 1,237.45 |
| AVG AVAILABLE BALANCE | 953.57 | CREDITS                 | .00      |
| AVERAGE BALANCE       | 953.57 | 11 DEBITS               | 971.54   |
|                       |        | THIS STATEMENT 09/07/11 | 265.91   |

|                          |                          |                          |
|--------------------------|--------------------------|--------------------------|
| ----- CHECKS -----       |                          |                          |
| CHECK #..DATE.....AMOUNT | CHECK #..DATE.....AMOUNT | CHECK #..DATE.....AMOUNT |
| 1044*08/08 6.16          | 1047 08/26 312.00        |                          |

*GA CASA BRAVES TICKETS*

(\*) INDICATES A GAP IN CHECK NUMBER SEQUENCE

|  |       |          |
|--|-------|----------|
| ----- OTHER DEBITS -----   |       |          |
| DESCRIPTION  | DATE  | AMOUNT   |
| POS 08/05/11 08:37 3571 GINA'S BISTRO &GINA'S BIS JONESBORO GA 100003  | 08/05 | 10.68 NR |
| POS 08/11/11 03:56 3571 COPELANDS OF NECOPELANDS ATLANTA GA 015858     | 08/11 | 10.55 NR |
| POS 08/18/11 08:57 3571 LAST RESORT GRILAST RESOR ATHENS GA 200299     | 08/18 | 4.00 NR  |
| POS 08/26/11 16:19 3571 CARRABBA'S #110CARRABBA'S MORROW GA 581331     | 08/26 | 45.59 NR |
| POS 08/26/11 16:19 3571 CARRABBA'S #110CARRABBA'S MORROW GA 581331     | 08/26 | 60.00 NR |
| POS 08/26/11 22:37 3571 LA FONDA LATINALA FONDA L ATLANTA GA 158185    | 08/29 | 35.46 NR |
| POS 08/30/11 01:19 3571 LOWES #00512* LOWES #005 STOCKBRIDGE GA 000743 | 08/30 | 321.40   |
| VZ WIRELESS VE E CHECK 2646337   | 09/06 | 160.41   |
| POS 09/07/11 09:36 3571 J & J BBQ J & J BBQ MARROW GA 206927           | 09/07 | 5.29 NR  |

\* \* \* CONTINUED \* \* \*

**Heritage**  
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ACCOUNT: [REDACTED] 1812 PAGE: 1  
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FRIENDS OF CLAYTON COUNTY  
 CASA INC  
 DBA GUARDIAN AD LITEM ACCOUNT  
 124 NORTH MCDONOUGH ST STE 101  
 JONESBORO GA 30236

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COMMUNITY CHECKING ACCOUNT [REDACTED] 1812

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|                       |         |                         |          |
|-----------------------|---------|-------------------------|----------|
|                       |         | LAST STATEMENT 09/07/11 | 265.91   |
| MINIMUM BALANCE       | 200.72- | 1 CREDITS               | 1,250.00 |
| AVG AVAILABLE BALANCE | 395.33  | 6 DEBITS                | 466.63   |
| AVERAGE BALANCE       | 422.11  | THIS STATEMENT 10/05/11 | 1,049.28 |

----- DEPOSITS -----

|       |       |          |       |      |        |       |      |        |
|-------|-------|----------|-------|------|--------|-------|------|--------|
| REF # | DATE  | AMOUNT   | REF # | DATE | AMOUNT | REF # | DATE | AMOUNT |
|       | 09/29 | 1,250.00 |       |      |        |       |      |        |

----- OTHER DEBITS -----

| DESCRIPTION  | DATE  | AMOUNT |
|--|-------|--------|
| POS 09/17/11 06:51 3571 LEE'S GOLDEN BULEE'S GOLD MORROW GA 09/19<br>577318                            |       | 39.72  |
| POS 09/22/11 22:07 3571 THE HOME DEPOT THE HOME D MORROW GA 09/23<br>010173 <i>no backup</i>           |       | 11.35  |
| POS 09/23/11 23:58 3571 CHILI'S GRI4760CHILI'S GR Morrow GA 09/26<br>426570                            |       | 34.60  |
| POS 09/23/11 22:23 3571 THE HOME DEPOT THE HOME D MORROW GA 09/26<br>010173 <i>no backup documents</i> |       | 188.75 |
| CHK# 00 AMT \$160.21, NSF FEE CHARGE   | 09/28 | 32.00  |
| VZ WIRELESS VE E CHECK 0000183   | 09/28 | 160.21 |

----- ITEMIZATION OF OVERDRAFT AND RETURNED ITEM FEES -----

|                             |             |              |
|-----------------------------|-------------|--------------|
| *****                       |             |              |
| *                           | TOTAL FOR   | TOTAL        |
| *                           | THIS PERIOD | YEAR TO DATE |
| -----*                      |             |              |
| * TOTAL OVERDRAFT FEES:     | 32.00       | 32.00        |
| -----*                      |             |              |
| * TOTAL RETURNED ITEM FEES: | .00         | .00          |
| *****                       |             |              |

\* \* \* C O N T I N U E D \* \* \*

CLAYTON\_014049

*File*



P.O. BOX 935 • 101 NORTH MAIN STREET  
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ACCOUNT: [REDACTED]  
 DOCUMENTS: 2

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FRIENDS OF CLAYTON COUNTY  
 CASA INC  
 DBA GUARDIAN AD LITEM ACCOUNT  
 124 NORTH MCDONOUGH ST STE 101  
 JONESBORO GA 30236

===== COMMUNITY CHECKING ACCOUNT [REDACTED] 1812 =====

|                       |          |  |                         |          |
|-----------------------|----------|--|-------------------------|----------|
|                       |          |  | LAST STATEMENT 10/05/11 | 1,049.28 |
| MINIMUM BALANCE       | 1,049.28 |  | 2 CREDITS               | 1,500.00 |
| AVG AVAILABLE BALANCE | 1,584.85 |  | 3 DEBITS                | 273.45   |
| AVERAGE BALANCE       | 1,709.85 |  | THIS STATEMENT 11/02/11 | 2,275.83 |

----- DEPOSITS -----

|       |       |        |       |       |          |       |      |        |
|-------|-------|--------|-------|-------|----------|-------|------|--------|
| REF # | DATE  | AMOUNT | REF # | DATE  | AMOUNT   | REF # | DATE | AMOUNT |
|       | 10/07 | 500.00 |       | 10/28 | 1,000.00 |       |      |        |

----- OTHER DEBITS -----

|   |       |        |
|---|-------|--------|
| DESCRIPTION   | DATE  | AMOUNT |
| POS 10/21/11 06:58 3571 RUBY TUESDAY #5RUBY TUESD HAMPTON GA 600126   | 10/21 | 60.88  |
| POS 11/02/11 09:55 3571 FLAVORS OF THAIFLAVORS OF JONESBORO GA 286724 | 11/02 | 51.76  |
| VZ WIRELESS VE E CHECK 8040467  | 11/02 | 160.81 |

----- ITEMIZATION OF OVERDRAFT AND RETURNED ITEM FEES -----

|       |                           |             |              |
|-------|---------------------------|-------------|--------------|
| ***** |                           |             |              |
| *     |                           | TOTAL FOR   | TOTAL        |
| *     |                           | THIS PERIOD | YEAR TO DATE |
| ----- |                           |             |              |
| *     | TOTAL OVERDRAFT FEES:     | .00         | 32.00        |
| ----- |                           |             |              |
| *     | TOTAL RETURNED ITEM FEES: | .00         | .00          |
| ***** |                           |             |              |

----- DAILY BALANCE -----

|       |          |       |          |      |         |
|-------|----------|-------|----------|------|---------|
| DATE  | BALANCE  | DATE  | BALANCE  | DATE | BALANCE |
| 10/07 | 1,549.28 | 10/28 | 2,488.40 |      |         |
| 10/21 | 1,488.40 | 11/02 | 2,275.83 |      |         |







P.O. BOX 935 • 101 NORTH MAIN STREET  
 JONESBORO, GEORGIA 30237-0935  
 (770) 478-8881

ACCOUNT: [REDACTED] 1812  
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*File*

FRIENDS OF CLAYTON COUNTY  
 CASA INC  
 DBA GUARDIAN AD LITEM ACCOUNT  
 124 NORTH MCDONOUGH ST STE 101  
 JONESBORO GA 30236

=====

COMMUNITY CHECKING ACCOUNT [REDACTED] 1812

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|                       |          |                         |          |
|-----------------------|----------|-------------------------|----------|
| MINIMUM BALANCE       | 2,146.57 | LAST STATEMENT 11/02/11 | 2,275.83 |
| AVG AVAILABLE BALANCE | 3,063.06 | 1 CREDITS               | 1,750.00 |
| AVERAGE BALANCE       | 3,113.06 | 10 DEBITS               | 601.99   |
|                       |          | THIS STATEMENT 12/07/11 | 3,423.84 |

----- DEPOSITS -----

|                           |                           |                           |
|---------------------------|---------------------------|---------------------------|
| REF #.....DATE.....AMOUNT | REF #.....DATE.....AMOUNT | REF #.....DATE.....AMOUNT |
| 11/17 1,750.00            |                           |                           |

----- CHECKS -----

|                                      |   |                                |
|--------------------------------------|---|--------------------------------|
| CHECK #..DATE.....AMOUNT             | CHECK #..DATE.....AMOUNT                  | CHECK #..DATE.....AMOUNT       |
| 1048 11/22 24.00<br><i>Volunteer</i> | 1049 11/21 45.51<br><i>Written to GB.</i> | 1050 11/28 40.00<br><i>GAL</i> |

----- OTHER DEBITS -----

|  |      |        |
|--|------|--------|
| DESCRIPTION  | DATE | AMOUNT |
| POS 11/08/11 08:25 3571 LEE'S GOLDEN BULEE'S GOLD MORROW GA 11/08<br>577371      |      | 102.99 |
| POS 11/10/11 00:07 3571 TOKYO JAPANESE TOKYO JAPA 11/10<br>STOCKBRIDGE GA 987197 |      | 26.27  |
| POS 11/18/11 19:43 3571 LONGHORN STEAKOLONGHORN S MORROW GA 11/18<br>397000      |      | 28.57  |
| VZ WIRELESS VE E CHECK 2919320 12/02   |      | 162.81 |
| POS 12/03/11 20:15 3571 DOLLAR-GENERAL DOLLAR-GEN JONESBORO 12/05<br>GA 100207   |      | 23.54  |
| POS 12/03/11 11:48 3571 FLAVORS OF THAIFLAVORS OF JONESBORO 12/05<br>GA 286724   |      | 24.94  |
| POS 12/03/11 17:56 3571 LUELLA'S RESTAULUELLA'S R JONESBORO 12/05<br>GA 000611   |      | 123.36 |

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 JONESBORO, GEORGIA 30237-0935  
 (770) 478-8881

ACCOUNT:  
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FRIENDS OF CLAYTON COUNTY  
 CASA INC  
 DBA GUARDIAN AD LITEM ACCOUNT

=====

COMMUNITY CHECKING ACCOUNT ██████████1812

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- - - ITEMIZATION OF OVERDRAFT AND RETURNED ITEM FEES - - -

```

*****
*                                     |          TOTAL FOR          |          TOTAL          *
*                                     |          THIS PERIOD        |          YEAR TO DATE   *
*-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|
* TOTAL OVERDRAFT FEES:             |          .00                |          32.00         *
*-----|-----|-----|-----|-----|-----|-----|-----|-----|
* TOTAL RETURNED ITEM FEES:         |          .00                |          .00           *
*****
    
```

- - - - - DAILY BALANCE - - - - -

| DATE..... | BALANCE  | DATE..... | BALANCE  | DATE..... | BALANCE  |
|-----------|----------|-----------|----------|-----------|----------|
| 11/08     | 2,172.84 | 11/18     | 3,868.00 | 11/28     | 3,758.49 |
| 11/10     | 2,146.57 | 11/21     | 3,822.49 | 12/02     | 3,595.68 |
| 11/17     | 3,896.57 | 11/22     | 3,798.49 | 12/05     | 3,423.84 |



P.O. BOX 935 • 101 NORTH MAIN STREET  
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ACCOUNT: ██████████ 1812 PAGE: 1  
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FRIENDS OF CLAYTON COUNTY  
 CASA INC  
 DBA GUARDIAN AD LITEM ACCOUNT  
 124 NORTH MCDONOUGH ST STE 101  
 JONESBORO GA 30236

=====

COMMUNITY CHECKING ACCOUNT ██████████ 1812

=====

|                       |          |                         |          |
|-----------------------|----------|-------------------------|----------|
|                       |          | LAST STATEMENT 12/07/11 | 3,423.84 |
| MINIMUM BALANCE       | 3,347.69 | 1 CREDITS               | 250.00   |
| AVG AVAILABLE BALANCE | 3,395.88 | 6 DEBITS                | 326.15   |
| AVERAGE BALANCE       | 3,404.81 | THIS STATEMENT 01/04/12 | 3,347.69 |

----- DEPOSITS -----

|                           |                           |                           |
|---------------------------|---------------------------|---------------------------|
| REF #.....DATE.....AMOUNT | REF #.....DATE.....AMOUNT | REF #.....DATE.....AMOUNT |
| 12/13 250.00              |                           |                           |

----- OTHER DEBITS -----

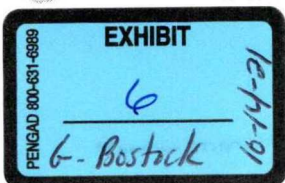
| DESCRIPTION   | DATE | AMOUNT |
|---|------|--------|
| POS 12/09/11 07:11 3571 PUBLIX #461 PUBLIX #46 MORROW GA 12/09 52.04<br>600152        |      |        |
| POS 12/16/11 05:34 3571 SUSHI CHINA CAFSUSHI CHIN MORROW 12/16 17.65<br>GA 102017     |      |        |
| POS 12/16/11 06:19 3571 JONESBORO DWARFJONESBORO JONESBORO 12/16 70.74<br>GA 710037   |      |        |
| POS 12/17/11 20:15 3571 MARSHALLS #0353MARSHALLS BUCKHEAD 12/19 161.98<br>GA 100248   |      |        |
| POS 12/21/11 10:05 3571 WAL-MART #0745 WAL-MART # 12/21 4.21<br>STOCKBRIDGE GA 141005 |      |        |
| POS 12/21/11 15:58 3571 ZAXBYS 001011 ZAXBYS 001 12/21 19.53<br>STOCKBRIDGE GA 118145 |      |        |

----- ITEMIZATION OF OVERDRAFT AND RETURNED ITEM FEES -----

|                             | TOTAL FOR THIS PERIOD | TOTAL YEAR TO DATE | PREVIOUS YEAR TOTAL |
|-----------------------------|-----------------------|--------------------|---------------------|
| * TOTAL OVERDRAFT FEES:     | .00                   | .00                | 32.00               |
| * TOTAL RETURNED ITEM FEES: | .00                   | .00                | .00                 |

\* \* \* CONTINUED \* \* \*

CLAYTON\_014029





P.O. BOX 935 • 101 NORTH MAIN STREET  
 JONESBORO, GEORGIA 30237-0935  
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ACCOUNT:  
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FRIENDS OF CLAYTON COUNTY  
 CASA INC  
 DBA GUARDIAN AD LITEM ACCOUNT  
 124 NORTH MCDONOUGH ST STE 101  
 JONESBORO GA 30236

=====

COMMUNITY CHECKING ACCOUNT [REDACTED] 1812

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|                       |          |                         |          |
|-----------------------|----------|-------------------------|----------|
| MINIMUM BALANCE       | 2,981.09 | LAST STATEMENT 01/04/12 | 3,347.69 |
| AVG AVAILABLE BALANCE | 3,289.99 | 2 CREDITS               | 1,312.28 |
| AVERAGE BALANCE       | 3,336.85 | 10 DEBITS               | 1,678.88 |
|                       |          | THIS STATEMENT 02/01/12 | 2,981.09 |

----- DEPOSITS -----

|                           |                           |                           |
|---------------------------|---------------------------|---------------------------|
| REF #.....DATE.....AMOUNT | REF #.....DATE.....AMOUNT | REF #.....DATE.....AMOUNT |
| 01/05 582.28              | 01/12 730.00              |                           |

*See check copies attached*

----- CHECKS -----

|                          |                          |                          |
|--------------------------|--------------------------|--------------------------|
| CHECK #..DATE.....AMOUNT | CHECK #..DATE.....AMOUNT | CHECK #..DATE.....AMOUNT |
| 1052 01/05 332.28 ✓      | 1053 01/05 250.00 ✓      | 1054 01/20 290.50 ✓      |

*GAL Travel*

----- OTHER DEBITS -----

|   |       |         |
|---|-------|---------|
| DESCRIPTION   | DATE  | AMOUNT  |
| VZ WIRELESS VE E CHECK 1669995  | 01/05 | 158.01  |
| POS 01/15/12 02:27 3571 FIREHOUSE SUBS FIREHOUSE HAMPTON GA 01/17         |       | 16.87   |
| 101041 <i>lunch - staff/VOI after Superior Court case</i>                 |       |         |
| POS 01/13/12 23:35 3571 FRONTIER AI 422FRONTIER A SAN <i>Travel</i> 01/17 |       | 323.00  |
| ANTONIO TX 580132 <i>GAL Trip to San Antonio (AG)</i>                     |       |         |
| POS 01/20/12 20:05 3571 THE OLIVE GARDOTHE OLIVE MORROW, GA 01/23         |       | 26.15   |
| 140000 <i>lunch mtg / prospective Board member</i>                        |       |         |
| POS 01/26/12 03:37 3571 BIRCH COMM BIRCH COMM 8882750777 GA 01/26         |       | 101.75  |
| 849731 <i>Board Office Phone/Internet Bill</i>                            |       |         |
| POS 01/26/12 09:13 3571 BEST BUY MHT OBEST BUY M MORROW GA 01/26          |       | 119.97  |
| 295100 <i>Buy camera</i>  |       |         |
| POS 01/27/12 21:45 3571 LAST CALL SOUTHLAST CALL ATLANTA GA 01/30         |       | 60.35 ✓ |
| 900013 <i>lunch mtg @ airport prior to departure</i>                      |       |         |

*\*\*\* CONTINUED \*\*\* to San Juan*

**Heritage**  
 BANK  
 P.O. BOX 935 • 101 NORTH MAIN STREET  
 JONESBORO, GEORGIA 30237-0935  
 (770) 478-8881

ACCOUNT: [REDACTED] 1812 PAGE: 1  
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FRIENDS OF CLAYTON COUNTY  
 CASA INC  
 DBA GUARDIAN AD LITEM ACCOUNT  
 121 S MCDONOUGH ST ANNEX 3  
 JONESBORO GA 30236

=====

COMMUNITY CHECKING ACCOUNT [REDACTED] 1812

=====

|                       |          |                         |                         |          |
|-----------------------|----------|-------------------------|-------------------------|----------|
|                       |          |                         | LAST STATEMENT 02/01/12 | 2,981.09 |
| MINIMUM BALANCE       | 2,493.12 | 4 CREDITS               |                         | 1,510.00 |
| AVG AVAILABLE BALANCE | 3,066.94 | 9 DEBITS                |                         | 592.01   |
| AVERAGE BALANCE       | 3,088.37 | THIS STATEMENT 03/07/12 |                         | 3,899.08 |

----- DEPOSITS -----

| REF # | DATE  | AMOUNT | REF # | DATE  | AMOUNT | REF # | DATE | AMOUNT |
|-------|-------|--------|-------|-------|--------|-------|------|--------|
|       | 02/03 | 10.00  |       | 02/29 | 250.00 |       |      |        |
|       | 02/14 | 500.00 |       | 02/29 | 750.00 |       |      |        |

----- CHECKS -----

| CHECK # | DATE  | AMOUNT | CHECK # | DATE | AMOUNT | CHECK # | DATE | AMOUNT |
|---------|-------|--------|---------|------|--------|---------|------|--------|
| 1055    | 02/09 | 126.50 |         |      |        |         |      |        |

----- OTHER DEBITS -----

| DESCRIPTION   | DATE  | AMOUNT |
|---|-------|--------|
| POS 02/04/12 02:00 3571 CASA CASA 404-8742888 GA 263400                 | 02/06 | 30.00  |
| POS 02/04/12 02:00 3571 CASA CASA 404-8742888 GA 263400                 | 02/06 | 30.00  |
| POS 02/04/12 02:00 3571 CASA CASA 404-8742888 GA 263400                 | 02/06 | 30.00  |
| VZ WIRELESS VE E CHECK 2197225  | 02/06 | 260.61 |
| POS 02/10/12 23:33 3571 LA FONDA LATINALA FONDA L ATLANTA GA 158113     | 02/13 | 20.86  |
| POS 02/17/12 08:49 3571 LEE'S GOLDEN BULEE'S GOLD MORROW GA 577471      | 02/17 | 52.43  |
| POS 03/02/12 20:47 3571 ATLANTA BAR ASSATLANTA BA 404-5210781 GA 400007 | 03/05 | 10.00  |
| POS 03/04/12 17:06 3571 FROGS FROGS ATLANTA GA 900019                   | 03/05 | 31.61  |

\* \* \* CONTINUED \* \*

*Rest/ BAR Alcohol only*

**Heritage**  
 B A N K  
 P.O. BOX 935 • 101 NORTH MAIN STREET  
 JONESBORO, GEORGIA 30237-0935  
 (770) 478-8881

ACCOUNT: [REDACTED] 1812 PAGE: 2  
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FRIENDS OF CLAYTON COUNTY  
 CASA INC  
 DBA GUARDIAN AD LITEM ACCOUNT

=====

COMMUNITY CHECKING ACCOUNT [REDACTED] 1812

=====

- - - ITEMIZATION OF OVERDRAFT AND RETURNED ITEM FEES - - -

| *****                       |             |              |   |
|-----------------------------|-------------|--------------|---|
| *                           | TOTAL FOR   | TOTAL        | * |
| *                           | THIS PERIOD | YEAR TO DATE | * |
| -----                       |             |              |   |
| * TOTAL OVERDRAFT FEES:     | \$ .00      | \$ .00       | * |
| -----                       |             |              |   |
| * TOTAL RETURNED ITEM FEES: | \$ .00      | \$ .00       | * |
| *****                       |             |              |   |

----- DAILY BALANCE -----

| DATE..... | BALANCE  | DATE..... | BALANCE  | DATE..... | BALANCE  |
|-----------|----------|-----------|----------|-----------|----------|
| 02/03     | 2,991.09 | 02/13     | 2,493.12 | 02/29     | 3,940.69 |
| 02/06     | 2,640.48 | 02/14     | 2,993.12 | 03/05     | 3,899.08 |
| 02/09     | 2,513.98 | 02/17     | 2,940.69 |           |          |



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 JONESBORO, GEORGIA 30237-0935  
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ACCOUNT:  
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FRIENDS OF CLAYTON COUNTY  
 CASA INC  
 DBA GUARDIAN AD LITEM ACCOUNT  
 121 S MCDONOUGH ST ANNEX 3  
 JONESBORO GA 30236

*FK*

COMMUNITY CHECKING ACCOUNT 1812

|                       |          |                         |          |
|-----------------------|----------|-------------------------|----------|
|                       |          | LAST STATEMENT 03/07/12 | 3,899.08 |
| MINIMUM BALANCE       | 3,723.85 | 2 CREDITS               | 1,000.00 |
| AVG AVAILABLE BALANCE | 4,002.00 | 7 DEBITS                | 839.39   |
| AVERAGE BALANCE       | 4,028.79 | THIS STATEMENT 04/04/12 | 4,059.69 |

|                              |        |                     |        |
|------------------------------|--------|---------------------|--------|
| - - - - - DEPOSITS - - - - - |        |                     |        |
| REF #.....DATE.....          | AMOUNT | REF #.....DATE..... | AMOUNT |
| 03/08                        | 500.00 | 04/04               | 500.00 |

|  |  |       |        |
|--|--|-------|--------|
| - - - - - OTHER DEBITS - - - - -   |  |       |        |
| DESCRIPTION  |  | DATE  | AMOUNT |
| POS 03/12/12 00:32 3571 MARRIOTT 33790 MARRIOTT 3 ATLANTA GA 004048                  |  | 03/12 | 6.70   |
| VZ WIRELESS VE E CHECK 0741831   |  | 03/12 | 263.01 |
| POS 03/13/12 05:03 3571 IKEA ATLANTA IKEA ATLAN ATLANTA GA 805007                    |  | 03/13 | 37.79  |
| POS 03/16/12 15:44 3571 JOES ON JUNIPERJOES ON JU ATLANTA ?<br><i>Restaurant/Bar</i> |  | 03/16 | 60.43  |
| POS 03/28/12 04:48 3571 GOOGLE *SmartphGOOGLE *Sm<br>GOOGLE.COM/CH CA 000199         |  | 03/28 | 1.99   |
| POS 03/28/12 23:43 3571 VERIZON WRLS 06VERIZON WR JONESBORO GA 630107                |  | 03/29 | 305.31 |
| VZ WIRELESS VE E CHECK 6342308   |  | 04/04 | 164.16 |

- - - ITEMIZATION OF OVERDRAFT AND RETURNED ITEM FEES - - -

|                             |  |             |              |
|-----------------------------|--|-------------|--------------|
| *****                       |  |             |              |
| *                           |  | TOTAL FOR   | TOTAL        |
| *                           |  | THIS PERIOD | YEAR TO DATE |
| -----                       |  |             |              |
| * TOTAL OVERDRAFT FEES:     |  | \$ .00      | \$ .00       |
| -----                       |  |             |              |
| * TOTAL RETURNED ITEM FEES: |  | \$ .00      | \$ .00       |
| *****                       |  |             |              |

\* \* \* C O N T I N U E D \* \* \*

CLAYTON\_014019



P.O. BOX 935 • 101 NORTH MAIN STREET  
 JONESBORO, GEORGIA 30237-0935  
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ACCOUNT: ██████████ 1812  
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FRIENDS OF CLAYTON COUNTY  
 CASA INC  
 DBA GUARDIAN AD LITEM ACCOUNT  
 7134 JONESBORO RD  
 MORROW GA 30260

===== COMMUNITY CHECKING ACCOUNT ██████████ 1812 =====

|                       |          |                         |          |
|-----------------------|----------|-------------------------|----------|
| MINIMUM BALANCE       | 3,447.73 | LAST STATEMENT 05/02/12 | 3,978.20 |
| AVG AVAILABLE BALANCE | 3,856.87 | 3 CREDITS               | 1,000.00 |
| AVERAGE BALANCE       | 3,871.15 | 7 DEBITS                | 1,061.87 |
|                       |          | THIS STATEMENT 06/06/12 | 3,916.33 |

| - - - - - DEPOSITS - - - - - |        |                     |        |
|------------------------------|--------|---------------------|--------|
| REF #.....DATE.....          | AMOUNT | REF #.....DATE..... | AMOUNT |
| 05/14                        | 500.00 | 05/15               | 250.00 |
|                              |        | 05/30               | 250.00 |

| - - - - - CHECKS - - - - - |        |                    |        |
|----------------------------|--------|--------------------|--------|
| CHECK #..DATE.....         | AMOUNT | CHECK #..DATE..... | AMOUNT |
| 1056 05/24                 | 144.84 |                    |        |

| - - - - - OTHER DEBITS - - - - -   |  |       |        |
|--|--|-------|--------|
| DESCRIPTION  |  | DATE  | AMOUNT |
| POS 05/03/12 02:07 3571 BY-AIR PACKAGE BY-AIR PAC SAINT SIMONS GA 009881 |  | 05/03 | 24.40  |
| <i>Cops Donation - supplies/reception</i>                                |  |       |        |
| VZ WIRELESS VE E CHECK 7446587   |  | 05/03 | 468.57 |
| POS 05/04/12 02:11 3571 CRABDADDY'S SEACRABDADDY' ST SIMONS GA 700046    |  | 05/04 | 37.50  |
| <i>Cops reception</i>  |  |       |        |
| POS 05/23/12 15:42 3571 CHILI'S GRI4760CHILI'S GR Morrow GA 426460       |  | 05/23 | 50.00  |
| <i>Gift Cards - DFCs Foster Parent Association</i>                       |  |       |        |
| POS 05/25/12 09:27 3571 FLAVORS OF THAI FLAVORS OF JONESBORO GA 286724   |  | 05/25 | 24.35  |
| <i>Volunteer Appreciation</i>  |  |       |        |
| VZ WIRELESS VE E CHECK 5571482   |  | 06/01 | 312.21 |

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ACCOUNT:  
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FRIENDS OF CLAYTON COUNTY  
 CASA INC  
 DBA GUARDIAN AD LITEM ACCOUNT

COMMUNITY CHECKING ACCOUNT 1812

- - - ITEMIZATION OF OVERDRAFT AND RETURNED ITEM FEES - - -

|                             | TOTAL FOR THIS PERIOD | TOTAL YEAR TO DATE |
|-----------------------------|-----------------------|--------------------|
| * TOTAL OVERDRAFT FEES:     | \$ .00                | \$ .00             |
| * TOTAL RETURNED ITEM FEES: | \$ .00                | \$ .00             |

DAILY BALANCE

| DATE  | BALANCE  | DATE  | BALANCE  | DATE  | BALANCE  |
|-------|----------|-------|----------|-------|----------|
| 05/03 | 3,485.23 | 05/15 | 4,197.73 | 05/25 | 3,978.54 |
| 05/04 | 3,447.73 | 05/23 | 4,147.73 | 05/30 | 4,228.54 |
| 05/14 | 3,947.73 | 05/24 | 4,002.89 | 06/01 | 3,916.33 |



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ACCOUNT: ██████████ 1812  
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FRIENDS OF CLAYTON COUNTY  
 CASA INC  
 DBA GUARDIAN AD LITEM ACCOUNT  
 7134 JONESBORO RD  
 MORROW GA 30260

=====

COMMUNITY CHECKING ACCOUNT ██████████ 1812

=====

|                       |          |                         |          |
|-----------------------|----------|-------------------------|----------|
|                       |          | LAST STATEMENT 06/06/12 | 3,916.33 |
| MINIMUM BALANCE       | 3,544.94 | 1 CREDITS               | 250.00   |
| AVG AVAILABLE BALANCE | 3,640.08 | 4 DEBITS                | 371.39   |
| AVERAGE BALANCE       | 3,649.34 | THIS STATEMENT 07/03/12 | 3,794.94 |

- - - - - DEPOSITS - - - - -

|       |       |        |       |      |        |       |      |        |
|-------|-------|--------|-------|------|--------|-------|------|--------|
| REF # | DATE  | AMOUNT | REF # | DATE | AMOUNT | REF # | DATE | AMOUNT |
|       | 07/02 | 250.00 |       |      |        |       |      |        |

- - - - - OTHER DEBITS - - - - -

|   |       |        |
|---|-------|--------|
| DESCRIPTION   | DATE  | AMOUNT |
| POS 06/09/12 08:53 3571 RANCHERO MEX RERANCHERO M JONESBORO GA 207735   | 06/11 | 23.05  |
| <i>Metro CASA Consultant - Lunch mtg</i>                                |       |        |
| POS 06/10/12 16:43 3571 FROGS FROGS ATLANTA GA 900019                   | 06/11 | 238.89 |
| <i>Dyck</i>   |       |        |
| POS 06/12/12 22:23 3571 TOKYO JAPANESE TOKYO JAPA STOCKBRIDGE GA 987113 | 06/13 | 41.18  |
| <i>Debt SPANOR MTG</i>  |       |        |
| POS 06/22/12 15:39 3571 CHILI'S GRI4760CHILI'S GR Morrow GA 426460      | 06/22 | 68.27  |
| <i>CHAMBER OF COMMERCE LUNCH / staff</i>                                |       |        |

- - - ITEMIZATION OF OVERDRAFT AND RETURNED ITEM FEES - - -

|                           |        |        |
|---------------------------|--------|--------|
| *****                     |        |        |
| TOTAL FOR THIS PERIOD     | TOTAL  |        |
| TOTAL OVERDRAFT FEES:     | \$ .00 | \$ .00 |
| TOTAL RETURNED ITEM FEES: | \$ .00 | \$ .00 |
| *****                     |        |        |

- - - - - DAILY BALANCE - - - - -

|       |          |       |          |       |          |
|-------|----------|-------|----------|-------|----------|
| DATE  | BALANCE  | DATE  | BALANCE  | DATE  | BALANCE  |
| 06/11 | 3,654.39 | 06/13 | 3,613.21 | 06/22 | 3,544.94 |

\* \* \* C O N T I N U E D \* \* \*



P.O. BOX 935 • 101 NORTH MAIN STREET  
JONESBORO, GEORGIA 30237-0935  
(770) 478-8881

ACCOUNT: [REDACTED] 1812  
DOCUMENTS: 1

PAGE: 2  
07/03/2012

FRIENDS OF CLAYTON COUNTY  
CASA INC  
DBA GUARDIAN AD LITEM ACCOUNT

=====

COMMUNITY CHECKING ACCOUNT [REDACTED] 1812

=====

| DATE.....BALANCE |          | DAILY BALANCE |  | DATE.....BALANCE |  |
|------------------|----------|---------------|--|------------------|--|
| 07/02            | 3,794.94 |               |  |                  |  |



P.O. BOX 935 101 NORTH MAIN STREET  
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ACCOUNT: [REDACTED] 1812  
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FRIENDS OF CLAYTON COUNTY  
 CASA INC  
 DBA GUARDIAN AD LITEM ACCOUNT  
 7134 JONESBORO RD  
 MORROW GA 30260

COMMUNITY CHECKING ACCOUNT [REDACTED] 1812

|                       |          |                         |          |
|-----------------------|----------|-------------------------|----------|
| MINIMUM BALANCE       | 3,469.42 | LAST STATEMENT 07/03/12 | 3,794.94 |
| AVG AVAILABLE BALANCE | 3,548.38 | 1 CREDITS               | 250.00   |
| AVERAGE BALANCE       | 3,557.01 | 4 DEBITS                | 435.71   |
|                       |          | THIS STATEMENT 08/01/12 | 3,609.23 |

----- DEPOSITS -----  
 REF #.....DATE.....AMOUNT REF #.....DATE.....AMOUNT REF #.....DATE.....AMOUNT  
 07/23 250.00

----- OTHER DEBITS -----

| DESCRIPTION   | DATE  | AMOUNT |
|---|-------|--------|
| VZ WIRELESS VE E CHECK 8329746                                      | 07/05 | 305.98 |
| POS 07/10/12 07:05 3571 ATLANTA BREAD CATLANTA BR MORROW GA 200188  | 07/10 | 19.54  |
| POS 07/27/12 15:23 3571 STAPLES OSTAPLES MORROW GA 105105           | 07/27 | 17.51  |
| POS 07/28/12 02:15 3571 MARLOWS TAVERN MARLOWS TA ATLANTA GA 001637 | 07/30 | 92.68  |

*Handwritten notes: VZ Association, School Supply, Deby Smith, sponsor folders*

--- ITEMIZATION OF OVERDRAFT AND RETURNED ITEM FEES ---

|                             |  |             |  |              |   |
|-----------------------------|--|-------------|--|--------------|---|
| *****                       |  |             |  |              |   |
| *                           |  | TOTAL FOR   |  | TOTAL        | * |
| *                           |  | THIS PERIOD |  | YEAR TO DATE | * |
| -----                       |  |             |  |              |   |
| * TOTAL OVERDRAFT FEES:     |  | \$ .00      |  | \$ .00       | * |
| -----                       |  |             |  |              |   |
| * TOTAL RETURNED ITEM FEES: |  | \$ .00      |  | \$ .00       | * |
| *****                       |  |             |  |              |   |

----- DAILY BALANCE -----

|                  |                  |                  |
|------------------|------------------|------------------|
| DATE.....BALANCE | DATE.....BALANCE | DATE.....BALANCE |
| 07/05 3,488.96   | 07/10 3,469.42   | 07/23 3,719.42   |

\* \* \* CONTINUED \* \* \*

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Equal Housing Lender

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FRIENDS OF CLAYTON COUNTY  
CASA INC  
DBA GUARDIAN AD LITEM ACCOUNT

COMMUNITY CHECKING ACCOUNT 1812

| DAILY BALANCE |          |       |          |      |         |
|---------------|----------|-------|----------|------|---------|
| DATE          | BALANCE  | DATE  | BALANCE  | DATE | BALANCE |
| 07/27         | 3,701.91 | 07/30 | 3,609.23 |      |         |



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ACCOUNT: [REDACTED] 1812  
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 10/03/2012

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FRIENDS OF CLAYTON COUNTY  
 CASA INC  
 DBA GUARDIAN AD LITEM ACCOUNT  
 7134 JONESBORO RD  
 MORROW GA 30260

=====

WE NOW OFFER A VARIETY OF CREDIT CARD OPTIONS. MAKE SURE TO ASK US  
 HOW WE CAN GET YOU APPROVED TODAY. IN ADDITION WHEN YOU APPLY YOU  
 WILL RECEIVE A FREE GIFT. HURRY WHILE SUPPLIES LAST! MEMBER FDIC.

=====

COMMUNITY CHECKING ACCOUNT [REDACTED] 1812

=====

|                       |          |                         |          |
|-----------------------|----------|-------------------------|----------|
|                       |          | LAST STATEMENT 09/05/12 | 3,152.22 |
| MINIMUM BALANCE       | 2,517.21 | 1 CREDITS               | 1,250.00 |
| AVG AVAILABLE BALANCE | 3,519.76 | 10 DEBITS               | 1,208.98 |
| AVERAGE BALANCE       | 3,528.69 | THIS STATEMENT 10/03/12 | 3,193.24 |

----- DEPOSITS -----

|                           |                           |                           |
|---------------------------|---------------------------|---------------------------|
| REF #.....DATE.....AMOUNT | REF #.....DATE.....AMOUNT | REF #.....DATE.....AMOUNT |
| 09/10 1,250.00            |                           |                           |

----- CHECKS -----

|                          |                          |                          |
|--------------------------|--------------------------|--------------------------|
| CHECK #..DATE.....AMOUNT | CHECK #..DATE.....AMOUNT | CHECK #..DATE.....AMOUNT |
| 1057 09/06 289.44        |                          |                          |

----- OTHER DEBITS -----

| DESCRIPTION   | DATE  | AMOUNT |
|---|-------|--------|
| POS 09/07/12 07:53 3571 GINA'S BISTRO &GINA'S BIS JONESBORO GA 100002 | 09/07 | 16.03  |
| <i>Dick Deby PCH mtg</i>  |       |        |
| VZ WIRELESS VE E CHECK 9986401  | 09/07 | 329.54 |
| POS 09/12/12 09:43 3571 ROCKY'S PIZZA ROCKY'S PI JONESBORO GA 200135  | 09/12 | 16.94  |
| <i>Dick Deby PCH mtg/sponsor mtg</i>                                  |       |        |
| POS 09/22/12 19:27 3571 MARSHALLS #0353MARSHALLS BUCKHEAD GA 100209   | 09/24 | 8.63   |
| <i>Gift for Pastor</i>  |       |        |
| POS 09/28/12 18:28 3571 CHILI'S GRI4760CHILI'S GR Morrow GA 426490    | 09/28 | 74.35  |
| <i>VED - Volunteer appreciation</i>                                   |       |        |
| POS 09/28/12 18:28 3571 CHILI'S GRI4760CHILI'S GR Morrow GA 426490    | 09/28 | 100.00 |
| <i>VED - Tip for servers</i>  |       |        |
| POS 09/29/12 08:43 3571 ROCKY'S PIZZA ROCKY'S PI JONESBORO GA 200135  | 10/01 | 9.61   |
| <i>Thank you for Deby set up - lunch</i>                              |       |        |
| POS 09/29/12 08:28 3571 LITTLE CAESARS LITTLE CAE JONESBORO GA 000185 | 10/01 | 62.84  |
| <i>Food/vegs Deby set up</i>  |       |        |

\* \* \* CONTINUED \* \* \*



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ACCOUNT: [REDACTED]  
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FRIENDS OF CLAYTON COUNTY  
 CASA INC  
 DBA GUARDIAN AD LITEM ACCOUNT

COMMUNITY CHECKING ACCOUNT [REDACTED] 1812

OTHER DEBITS

| DESCRIPTION                    | DATE  | AMOUNT |
|--------------------------------|-------|--------|
| VZ WIRELESS VE E CHECK 6446959 | 10/03 | 301.60 |

ITEMIZATION OF OVERDRAFT AND RETURNED ITEM FEES

|                             | TOTAL FOR THIS PERIOD | TOTAL YEAR TO DATE |
|-----------------------------|-----------------------|--------------------|
| * TOTAL OVERDRAFT FEES:     | \$ .00                | \$ .00             |
| * TOTAL RETURNED ITEM FEES: | \$ .00                | \$ .00             |

DAILY BALANCE

| DATE  | BALANCE  | DATE  | BALANCE  | DATE  | BALANCE  |
|-------|----------|-------|----------|-------|----------|
| 09/06 | 2,862.78 | 09/12 | 3,750.27 | 10/01 | 3,494.84 |
| 09/07 | 2,517.21 | 09/24 | 3,741.64 | 10/03 | 3,193.24 |
| 09/10 | 3,767.21 | 09/28 | 3,567.29 |       |          |



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FRIENDS OF CLAYTON COUNTY  
 CASA INC  
 DBA GUARDIAN AD LITEM ACCOUNT  
 7134 JONESBORO RD  
 MORROW GA 30260

=====

BEGINNING IN JANUARY, HERITAGE BANK WILL BEGIN MASKING ALL BUT THE LAST FOUR DIGITS OF YOUR ACCOUNT NUMBER ON STATEMENT AND NOTICE DOCUMENTS. WE ARE DOING THIS IN AN EFFORT TO PROTECT YOUR ACCOUNT INFORMATION. IF YOU HAVE ANY QUESTIONS, YOU CAN CONTACT ONE OF OUR BRANCH LOCATIONS.

=====

COMMUNITY CHECKING ACCOUNT [REDACTED] 1812

|                       |          |                         |          |
|-----------------------|----------|-------------------------|----------|
| MINIMUM BALANCE       | 2,378.53 | LAST STATEMENT 10/03/12 | 3,193.24 |
| AVG AVAILABLE BALANCE | 2,958.73 | CREDITS                 | .00      |
| AVERAGE BALANCE       | 2,958.73 | 9 DEBITS                | 814.71   |
|                       |          | THIS STATEMENT 11/07/12 | 2,378.53 |

----- CHECKS -----

|                          |                          |                          |
|--------------------------|--------------------------|--------------------------|
| CHECK #..DATE.....AMOUNT | CHECK #..DATE.....AMOUNT | CHECK #..DATE.....AMOUNT |
| 1058 10/22 250.00        |                          |                          |

----- OTHER DEBITS -----

| DESCRIPTION  | DATE  | AMOUNT |
|--|-------|--------|
| POS 10/12/12 08:06 3571 RUBY TUESDAY #5 RUBY TUESD HAMPTON GA 000142   | 10/12 | 27.50  |
| <i>START Application lunch/Mtg - C.C.H. man</i>                        |       |        |
| POS 10/20/12 09:55 3571 BUBBLES ATLANTA BUBBLES AT ATLANTA GA 200860   | 10/22 | 25.00  |
| <i>GIFT CARD - METRO SUPER HERO 5K Run Donation</i>                    |       |        |
| POS 10/20/12 08:03 3571 PUBLIX #599 PUBLIX #59 ATLANTA GA 000182       | 10/22 | 62.53  |
| <i>Gift Donations - metro super hero 5k Run</i>                        |       |        |
| POS 10/25/12 09:04 3571 FRONT PAGE NEWS FRONT PAGE ATLANTA GA 206588   | 10/25 | 27.68  |
| <i>Metro CASA Cons-Lit Mtg Lunch Mtg</i>                               |       |        |
| POS 11/02/12 08:02 3571 GINA'S BISTRO & GINA'S BIS JONESBORO GA 100001 | 11/02 | 36.33  |
| <i>AFC Lunch mtg - Christmas Planning</i>                              |       |        |
| POS 11/05/12 05:17 3571 EL TORERO ATLANEL TORERO ATLANTA GA 000192     | 11/05 | 42.05  |
| <i>Metro CASA Application</i>  |       |        |
| VZ WIRELESS VE E CHECK 2887836   | 11/05 | 308.12 |
| POS 11/06/12 16:01 3571 COLONY SQUARE COLONY SQU ATLANTA GA 000484     | 11/06 | 35.50  |
| <i>KINSHIP MTO -</i>   |       |        |

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ACCOUNT: ██████████ 1812  
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FRIENDS OF CLAYTON COUNTY  
 CASA INC  
 DBA GUARDIAN AD LITEM ACCOUNT

=====

COMMUNITY CHECKING ACCOUNT ██████████ 1812

=====

- - - ITEMIZATION OF OVERDRAFT AND RETURNED ITEM FEES - - -

| ***** |                           |             |              |   |
|-------|---------------------------|-------------|--------------|---|
| *     |                           | TOTAL FOR   | TOTAL        | * |
| *     |                           | THIS PERIOD | YEAR TO DATE | * |
| ----- |                           |             |              |   |
| *     | TOTAL OVERDRAFT FEES:     | \$ .00      | \$ .00       | * |
| *     | TOTAL RETURNED ITEM FEES: | \$ .00      | \$ .00       | * |
| ***** |                           |             |              |   |

- - - - - DAILY BALANCE - - - - -

| DATE..... | BALANCE  | DATE..... | BALANCE  | DATE..... | BALANCE  |
|-----------|----------|-----------|----------|-----------|----------|
| 10/12     | 3,165.74 | 10/25     | 2,800.53 | 11/05     | 2,414.03 |
| 10/22     | 2,828.21 | 11/02     | 2,764.20 | 11/06     | 2,378.53 |



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ACCOUNT:  
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FRIENDS OF CLAYTON COUNTY  
 CASA INC  
 DBA GUARDIAN AD LITEM ACCOUNT  
 9163 TARA BLVD  
 JONESBORO GA 30236

=====

BEGINNING IN JANUARY, HERITAGE BANK WILL BEGIN MASKING ALL BUT THE LAST FOUR DIGITS OF YOUR ACCOUNT NUMBER ON STATEMENT AND NOTICE DOCUMENTS. WE ARE DOING THIS IN AN EFFORT TO PROTECT YOUR ACCOUNT INFORMATION. IF YOU HAVE ANY QUESTIONS, YOU CAN CONTACT ONE OF OUR BRANCH LOCATIONS.

=====

COMMUNITY CHECKING ACCOUNT 1812

|                       |          |                         |          |
|-----------------------|----------|-------------------------|----------|
|                       |          | LAST STATEMENT 11/07/12 | 2,378.53 |
| MINIMUM BALANCE       | 2,001.45 | CREDITS                 | .00      |
| AVG AVAILABLE BALANCE | 2,343.91 | 5 DEBITS                | 377.08   |
| AVERAGE BALANCE       | 2,343.91 | THIS STATEMENT 12/05/12 | 2,001.45 |

- - - - - OTHER DEBITS - - - - -

| DESCRIPTION  | DATE  | AMOUNT |
|--|-------|--------|
| POS 11/08/12 09:03 3571 JASON'S DELI # JASON'S DE ATLANTA<br>GA 000004 <i>Metro Collab - Sartre's walk through</i> | 11/08 | 9.70   |
| POS 11/14/12 07:41 3571 CANOE CANOE ATLANTA GA 104015  | 11/14 | 15.72  |
| POS 12/05/12 09:03 3571 GINA'S BISTRO & GINA'S BIS JONESBORO<br>GA 100001 <i>ASC mtg</i>                           | 12/05 | 14.96  |
| POS 12/05/12 18:34 3571 RUBY TUESDAY #5RUBY TUESD HAMPTON<br>GA 100204 <i>Children's Christmas Event - ABC's</i>   | 12/05 | 32.73  |
| VZ WIRELESS VE E CHECK 6615352<br><i>MCA 2012/phone</i>  | 12/05 | 303.97 |

- - - ITEMIZATION OF OVERDRAFT AND RETURNED ITEM FEES - - -

|                             |             |              |   |
|-----------------------------|-------------|--------------|---|
| *****                       |             |              |   |
| *                           | TOTAL FOR   | TOTAL        | * |
| *                           | THIS PERIOD | YEAR TO DATE | * |
| -----                       |             |              |   |
| * TOTAL OVERDRAFT FEES:     | \$ .00      | \$ .00       | * |
| -----                       |             |              |   |
| * TOTAL RETURNED ITEM FEES: | \$ .00      | \$ .00       | * |
| *****                       |             |              |   |

\* \* \* CONTINUED \* \* \*

# Heritage BANK

P.O. BOX 935 • 101 NORTH MAIN STREET  
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ACCOUNT: XXXXXX1812 PAGE: 1  
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*GAL Account*  
*2013: Jan-April*  
*2012: Jan-April, Aug, Dec*  
*missing May, June, July, Sept, Oct*  
*2011: Feb-Dec*  
*missing Jan*

000070

FRIENDS OF CLAYTON COUNTY  
CASA INC  
DBA GUARDIAN AD LITEM ACCOUNT  
9163 TARA BLVD  
JONESBORO GA 30236

=====

HAVE YOU CHECKED OUT OUR COMPETITIVE RATES ON USED AND NEW CAR PURCHASES? WE ARE OFFERING A 4.75 APR UP TO 60 MONTHS. SUBJECT TO CREDIT APPROVAL. CALL US TODAY AT 770-478-8881 TO GET PRE-QUALIFIED. MEMBER FDIC. EQUAL HOUSING LENDER.

=====

COMMUNITY CHECKING ACCOUNT XXXXXX1812

=====

|                       |          |                         |          |
|-----------------------|----------|-------------------------|----------|
|                       |          | LAST STATEMENT 03/06/13 | 2,997.41 |
| MINIMUM BALANCE       | 2,310.06 | CREDITS                 | .00      |
| AVG AVAILABLE BALANCE | 2,675.34 | 11 DEBITS               | 687.35   |
| AVERAGE BALANCE       | 2,675.34 | THIS STATEMENT 04/03/13 | 2,310.06 |

----- CHECKS -----


| CHECK #..DATE.....AMOUNT | CHECK #..DATE.....AMOUNT | CHECK #..DATE.....AMOUNT |
|--------------------------|--------------------------|--------------------------|
| 1062 03/20 82.57         | 1063 03/18 250.00        |                          |

----- OTHER DEBITS -----

| DESCRIPTION  | DATE  | AMOUNT   |
|--|-------|----------|
| POS 03/09/13 03:44 3571 WOOF'S ON PIEDMONT WOOF'S ON P ATLANTA GA 001293 | 03/11 | 45.88 ✓  |
| POS 03/14/13 15:23 3571 PHILIPS-CONCES PHILIPS-CO ATLANTA GA 156251      | 03/14 | 15.00 ✓  |
| POS 03/15/13 23:23 3571 BLAKES ON THE PBLAKES ON ATLANTA GA 158196       | 03/18 | 16.00 ✓  |
| POS 03/15/13 23:23 3571 BLAKES ON THE PBLAKES ON ATLANTA GA 158196       | 03/18 | 23.50 ✓  |
| POS 03/21/13 09:20 3571 MCDONALD'S F162 MCDONALD'S JONESBORO GA 720012   | 03/21 | 23.02 ✓  |
| POS 03/23/13 01:37 3571 COWTIPPERS COWTIPPERS ATLANTA GA 900018          | 03/25 | 42.82 ✓  |
| POS 03/27/13 22:28 3571 TOWER BEER WINETOWER BEER ATLANTA GA 158163      | 03/28 | 31.35 ✓  |
| POS 03/30/13 08:20 3571 WAL-MART #3621 WAL-MART # CHAMBLEE GA 091004     | 04/01 | 26.56    |
| POS 04/01/13 04:00 3571 DOUBLETREE HOTEDOUBLETREE BIRMINGHAM AL 072000   | 04/01 | 130.65 ✓ |

\*\*\* CONTINUED \*\*\*

**EXHIBIT**  
7  
6. Bostock  
10-14-21

Equal Housing Lender 

HERITAGE 24 (404) 897-5447

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ACCOUNT:  
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FRIENDS OF CLAYTON COUNTY  
 CASA INC  
 DBA GUARDIAN AD LITEM ACCOUNT  
 9163 TARA BLVD  
 JONESBORO GA 30236

=====

HAVE YOU MADE YOUR IRA CONTRIBUTIONS THIS YEAR? ASK US ABOUT WAYS  
 TO SAVE AND INVEST. CALL 770-478-8881. MEMBER FDIC

=====

COMMUNITY CHECKING ACCOUNT XXXXXX1812

=====

|                       |          |                         |          |
|-----------------------|----------|-------------------------|----------|
| MINIMUM BALANCE       | 2,517.37 | LAST STATEMENT 02/06/13 | 2,517.37 |
| AVG AVAILABLE BALANCE | 3,073.35 | 3 CREDITS               | 1,250.00 |
| AVERAGE BALANCE       | 3,107.27 | 9 DEBITS                | 769.96   |
|                       |          | THIS STATEMENT 03/06/13 | 2,997.41 |

----- DEPOSITS -----

|       |       |        |       |       |        |       |       |        |
|-------|-------|--------|-------|-------|--------|-------|-------|--------|
| REF # | DATE  | AMOUNT | REF # | DATE  | AMOUNT | REF # | DATE  | AMOUNT |
|       | 02/08 | 250.00 |       | 02/12 | 500.00 |       | 02/25 | 500.00 |

----- CHECKS -----

|         |       |        |         |      |        |         |      |        |
|---------|-------|--------|---------|------|--------|---------|------|--------|
| CHECK # | DATE  | AMOUNT | CHECK # | DATE | AMOUNT | CHECK # | DATE | AMOUNT |
| 1061    | 03/01 | 178.54 |         |      |        |         |      |        |

----- OTHER DEBITS -----

|   |       |        |
|---|-------|--------|
| DESCRIPTION   | DATE  | AMOUNT |
| POS 02/13/13 10:10 3571 JASON'S DELI # JASON'S DE ATLANTA   | 02/13 | 11.42  |
| GA 000164   |       |        |
| POS 02/13/13 10:30 3571 WOOF'S ON PIEDMOWOOF'S ON P ATLANTA | 02/13 | 33.11  |
| GA 105003   |       |        |
| POS 02/14/13 09:29 3571 PUBLIX #545 PUBLIX #54 HAMPTON GA   | 02/14 | 9.31   |
| 000183  |       |        |
| POS 02/14/13 04:29 3571 EL TORERO ATLANEL TORERO ATLANTA GA | 02/14 | 35.52  |
| 000803  |       |        |
| POS 02/15/13 10:43 3571 MCDONALD'S F162MCDONALD'S JONESBORO | 02/15 | 27.71  |
| GA 720012   |       |        |
| POS 02/16/13 08:05 3571 LEE'S GOLDEN BULEE'S GOLD MORROW GA | 02/19 | 117.30 |
| 577833  |       |        |
| POS 02/28/13 15:31 3571 COW TIPPERS COW TIPPER ATLANTA GA   | 02/28 | 59.52  |
| 640591  |       |        |
| ACHIVR VISB BILL PYMNT 1288652                              | 03/04 | 297.53 |

Verizon \* \* \* CONTINUED \* \* \*

# Heritage

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*File*

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FRIENDS OF CLAYTON COUNTY  
 CASA INC  
 DBA GUARDIAN AD LITEM ACCOUNT  
 9163 TARA BLVD  
 JONESBORO GA 30236

=====

MORTGAGE RATES ARE STILL AT ALL TIME LOWS. ARE YOU LOOKING TO REFINANCE OR PURCHASE A NEW HOME? DID YOU KNOW YOU CAN APPLY FOR A MORTGAGE LOAN ONLINE? GO TO WWW.HERITAGEBANK.COM AND CLICK ON MORTGAGES / ACCESS MORTGAGE CENTER. MEMBER FDIC / EQUAL HOUSING LENDER.

=====

COMMUNITY CHECKING ACCOUNT XXXXXX1812

|                       |          |                         |          |
|-----------------------|----------|-------------------------|----------|
|                       |          | LAST STATEMENT 01/02/13 | 1,998.21 |
| MINIMUM BALANCE       | 1,675.48 | 1 CREDITS               | 1,250.00 |
| AVG AVAILABLE BALANCE | 2,610.07 | 5 DEBITS                | 730.84   |
| AVERAGE BALANCE       | 2,638.64 | THIS STATEMENT 02/06/13 | 2,517.37 |

----- DEPOSITS -----

|                           |                           |                           |
|---------------------------|---------------------------|---------------------------|
| REF #.....DATE.....AMOUNT | REF #.....DATE.....AMOUNT | REF #.....DATE.....AMOUNT |
| 01/10 1,250.00            |                           |                           |

----- CHECKS -----

|                          |   |                          |
|--------------------------|---|--------------------------|
| CHECK #..DATE.....AMOUNT | CHECK #..DATE.....AMOUNT                                    | CHECK #..DATE.....AMOUNT |
| 1060 01/31 71.45         | <i>Shelley Johnson Reimbursement - Notary Certification</i> |                          |

----- OTHER DEBITS -----

|   |       |         |
|---|-------|---------|
| DESCRIPTION   | DATE  | AMOUNT  |
| VZ WIRELESS VE E CHECK 2588035  | 01/04 | 301.90  |
| POS 01/09/13 15:39 3571 COW TIPPERS COW TIPPER ATLANTA GA 640091      | 01/09 | 20.83 ✓ |
| <i>GA CASA L+P Donation → gift card</i>                               |       |         |
| POS 01/30/13 09:40 3571 BURGER KING #78BURGER KIN JONESBORO GA 207399 | 01/30 | 41.20   |
| <i>Breakfast - staff mtg</i>  |       |         |
| VZ WIRELESS VE E CHECK 5186911  | 02/04 | 295.46  |

*Verizon - net books/phone*

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ACCOUNT: [REDACTED] 1812  
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FRIENDS OF CLAYTON COUNTY  
 CASA INC  
 DBA GUARDIAN AD LITEM ACCOUNT  
 9163 TARA BLVD  
 JONESBORO GA 30236

=====

TIME IS RUNNING OUT! IF YOU ARE RECEIVING A FEDERAL BENEFIT PAYMENT BY CHECK, YOU NEED TO SWITCH TO AN ELECTRONIC PAYMENT TODAY. YOU CAN VISIT A LOCAL BRANCH REPRESENTATIVE, SWITCH ONLINE AT WWW.GODIRECT.ORG, OR CALL (800)333-1795. PLEASE ACT TODAY. FOR MORE DETAILS, CALL 770-478-8881.

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COMMUNITY CHECKING ACCOUNT [REDACTED] 1812

|                       |          |                         |          |
|-----------------------|----------|-------------------------|----------|
|                       |          | LAST STATEMENT 12/05/12 | 2,001.45 |
| MINIMUM BALANCE       | 1,998.21 | 1 CREDITS               | 500.00   |
| AVG AVAILABLE BALANCE | 2,023.65 | 3 DEBITS                | 503.24   |
| AVERAGE BALANCE       | 2,077.22 | THIS STATEMENT 01/02/13 | 1,998.21 |

----- DEPOSITS -----

|                           |  |                           |
|---------------------------|--|---------------------------|
| REF #.....DATE.....AMOUNT | REF #.....DATE.....AMOUNT  | REF #.....DATE.....AMOUNT |
| 12/07 500.00              | <i>Donation - Should have been deposited in FCCC Acct? for luncheon *see attached*</i> |                           |

----- CHECKS -----

|                          |  |                          |
|--------------------------|--|--------------------------|
| CHECK #..DATE.....AMOUNT | CHECK #..DATE.....AMOUNT                   | CHECK #..DATE.....AMOUNT |
| 1059 12/10 428.41        | <i>GB reimbursed himself for luncheon.</i> |                          |

----- OTHER DEBITS -----

|   |   |        |
|---|---|--------|
| DESCRIPTION   | DATE  | AMOUNT |
| POS 12/15/12 00:08 3571 SKYBOXX RESTAURSKYBOXX RE MORROW GA 12/17 |   | 49.75  |
| 158195  | <i>Staff Appreciation - Fun Drive Party</i> |        |
| POS 12/22/12 11:14 3571 STARBUCKS #0835STARBUCKS Atlanta GA 12/24 |   | 25.08  |
| 000629  | <i>Appreciation Gift - Duane Heathering</i> |        |

\*\*\* CONTINUED \*\*\*

**Heritage**  
 BANK  
 P.O. BOX 935 • 101 NORTH MAIN STREET  
 JONESBORO, GEORGIA 30237-0935  
 (770) 478-8881

ACCOUNT: ██████████ 8563  
 DOCUMENTS: 8

PAGE: 1  
 01/19/2011

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FRIENDS OF CLAYTON COUNTY  
 CASA INC  
 124 NORTH MCDONOUGH ST STE 101  
 JONESBORO GA 30236

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COMMUNITY CHECKING ACCOUNT ██████████ 8563

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|                       |           |                         |           |
|-----------------------|-----------|-------------------------|-----------|
|                       |           | LAST STATEMENT 12/15/10 | 16,651.09 |
| MINIMUM BALANCE       | 16,137.44 | CREDITS                 | .00       |
| AVG AVAILABLE BALANCE | 16,215.49 | 8 DEBITS                | 513.65    |
| AVERAGE BALANCE       | 16,215.49 | THIS STATEMENT 01/19/11 | 16,137.44 |

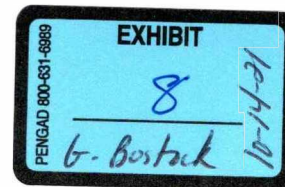
| CHECKS  |       |        |         |       |        |
|---------|-------|--------|---------|-------|--------|
| CHECK # | DATE  | AMOUNT | CHECK # | DATE  | AMOUNT |
| 2595    | 12/20 | 16.00  | 2598    | 12/21 | 12.00  |
| 2596    | 12/20 | 32.00  | 2599    | 12/22 | 66.00  |
| 2597    | 12/20 | 32.00  | 2600*   | 12/20 | 111.00 |
| 2651    | 12/21 | 148.41 |         |       |        |
| 2652    | 12/24 | 96.24  |         |       |        |

(\* ) INDICATES A GAP IN CHECK NUMBER SEQUENCE

- - - ITEMIZATION OF OVERDRAFT AND RETURNED ITEM FEES - - -

|                             |     |     |     |
|-----------------------------|-----|-----|-----|
| *****                       |     |     |     |
| * TOTAL OVERDRAFT FEES:     | .00 | .00 | .00 |
| * TOTAL RETURNED ITEM FEES: | .00 | .00 | .00 |
| *****                       |     |     |     |

| DAILY BALANCE |           |       |           |      |         |
|---------------|-----------|-------|-----------|------|---------|
| DATE          | BALANCE   | DATE  | BALANCE   | DATE | BALANCE |
| 12/20         | 16,460.09 | 12/22 | 16,233.68 |      |         |
| 12/21         | 16,299.68 | 12/24 | 16,137.44 |      |         |





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ACCOUNT:  
 DOCUMENTS:

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PAGE: 1  
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*File*

FRIENDS OF CLAYTON COUNTY  
 CASA INC  
 124 NORTH MCDONOUGH ST STE 101  
 JONESBORO GA 30236

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COMMUNITY CHECKING ACCOUNT 8563

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|                       |           |                         |           |
|-----------------------|-----------|-------------------------|-----------|
| MINIMUM BALANCE       | 17,325.55 | LAST STATEMENT 12/21/11 | 18,115.84 |
| AVG AVAILABLE BALANCE | 17,771.82 | CREDITS                 | .00       |
| AVERAGE BALANCE       | 17,771.82 | 3 DEBITS                | 790.29    |
|                       |           | THIS STATEMENT 01/18/12 | 17,325.55 |

----- CHECKS -----

|                          |                          |                          |
|--------------------------|--------------------------|--------------------------|
| CHECK #..DATE.....AMOUNT | CHECK #..DATE.....AMOUNT | CHECK #..DATE.....AMOUNT |
| 2700 12/23 101.73        |                          |                          |

----- OTHER DEBITS -----

| DESCRIPTION   | DATE | AMOUNT            |
|---|------|-------------------|
| POS 01/08/12 06:21 8120 AIRTRANAIR 332AIRTRANAIR ATLANTA GA 01/09<br>580072 |      | 344.28 <i>N/e</i> |
| POS 01/08/12 06:21 8120 AIRTRANAIR 332AIRTRANAIR ATLANTA GA 01/09<br>580072 |      | 344.28 <i>N/e</i> |

- - - ITEMIZATION OF OVERDRAFT AND RETURNED ITEM FEES - - -

|                             | TOTAL FOR THIS PERIOD | TOTAL YEAR TO DATE | PREVIOUS YEAR TOTAL |
|-----------------------------|-----------------------|--------------------|---------------------|
| * TOTAL OVERDRAFT FEES:     | .00                   | .00                | .00                 |
| * TOTAL RETURNED ITEM FEES: | .00                   | .00                | .00                 |

----- DAILY BALANCE -----

|                  |                  |                  |
|------------------|------------------|------------------|
| DATE.....BALANCE | DATE.....BALANCE | DATE.....BALANCE |
| 12/23 18,014.11  | 01/09 17,325.55  |                  |

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